Modern Slavery Statement 2025

Citi Australia

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Statement

Purpose of statement

This statement is made by Citibank N.A. (Sydney Branch) ("CBNA Sydney"), Citigroup Pty Limited ("CPL"), Citigroup Global Markets Australia Pty Limited ("CGMA") and Citigroup Global Markets Australia Holdings Pty Limited ("CGMAH"). For the purposes of this statement, the aforementioned entities shall collectively be referred to as "Citi Australia." The Citi Australia entities are wholly-owned subsidiaries of Citigroup Inc ("Citi"). Each of CPL, CGMA and CGMAH own and control subsidiary entities ("relevant subsidiaries"). References in this statement to the modern slavery risks and actions of Citi Australia include the relevant subsidiaries. This statement is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth) ("Act") and covers the financial year from 1 January 2025 to 31 December 2025 ("FY2025"). All figures within this statement are accurate as of 31 December 2025. This statement summarises Citi Australia's current approach to assessing and addressing modern slavery risks that Citi Australia faces across its operations and supply chain, the actions that Citi Australia undertook in FY2025, and those that Citi Australia plan to take in the future to help mitigate against modern slavery risks.

Being part of a global financial institution, Citi Australia recognises it has a responsibility to identify the risks of modern slavery within the organisation and supply chain and to help mitigate modern slavery risks wherever Citi Australia has a reasonable ability to work towards that goal.

About Citi

Mission and Strategy

Citi is a preeminent banking partner for corporate, investor and public sector clients with cross-border needs.

Citi does business in nearly 180 countries and jurisdictions, providing corporations, governments, investors, institutions and individuals with a broad range of financial products and services. Globally, Citi's operating model is focused on five interconnected businesses: services, markets, banking and international and U.S. Personal Banking. Today, Citi Australia delivers an innovative range of global products and services to more than one thousand local corporate, public sector and institutional clients. In Australia, Citi offers services across four interconnected businesses: services, markets, banking and wealth.

For more information about Citi Australia, you can view its website.

Structure

CBNA Sydney is a Foreign Authorised Deposit-Taking Institution regulated by the Australian Prudential Regulation Authority (APRA).

It is also regulated by the Australian Securities & Investments Commission (ASIC) and provides services in Australia through ASIC Class Order [CO 03/1101] which recognises that the entity is equivalently regulated by the Office of the Comptroller of the Currency (OCC) and The Federal Reserve Bank (FRB) in the US.

The other key operating entities in Australia are:

- Citigroup Global Markets Australia Holdings Pty Limited*;
- Citigroup Global Markets Australia Pty Limited*; and
- Citigroup Pty Limited*.

*Note: Citigroup Global Markets Australia Holdings Pty Limited, Citigroup Global Markets Australia Pty Limited & Citigroup Pty Limited are all regulated by ASIC.

The Citi Australia entities' legal and ABN information are as follows:

Reporting entity	ABN
Citibank N.A. (Sydney Branch)	ABN 34 072 814 058
Citigroup Pty Limited	ABN 88 004 325 080
Citigroup Global Markets Australia Pty Limited	ABN 64 003 114 832
Citigroup Global Markets Australia Holdings Pty Limited	ABN 56 081 472 684

Overview of Citi's operations

Citi is a leading global bank, with approximately 200 million customer accounts and does business in nearly 180 countries and jurisdictions. Citi provides corporations, governments and institutions with a broad range of financial products and services. The below outlines Citi Australia's specific operations in 2025.

Markets

The **Markets** business provides underwriting, sale and trading and distribution capabilities to Citi Australia and global clients and has commercial arrangements with brokerage firms which provide Citi Australia customers with access to investment products.

Services

The Treasury and Trade Solutions ("TTS") business provides integrated cash management, working capital and trade finance solutions to multinational corporations, financial institutions and public sector organisations in Australia.

Issuer and Investor Services provide custody, fund administration, transfer agency, data & investment analytics, taxation and regulatory reporting, issue services and middle office services to financial institutions such as fund managers, wealth platforms and asset owners including superannuation funds with the appropriate scale.

Banking and International

The Capital Market and Advisory business provide M&A advice, debt and equity capital markets solutions for corporations, governments and financial institutions.

The Corporate Bank provides clients with access to a full suite of products.

The Commercial Bank is a solutions-led business for the demands of mid-sized and emerging corporates.

Wealth provides personalized wealth management solutions to Ultra-High Net Worth Individuals. Wealth products include banking, investment, investment finance, and other financial services.

As at the end of FY 2025, Citi Australia had 816 employees based in Australia. The majority of Citi Australia's employees are recruited directly. In addition, Citi Australia may engage external supplier personnel, including contractors and consultants, on a non-permanent basis ("non-employees") for a variety of different business purposes, including project-based work for a defined period of time, securing specialised or niche skill sets that are not readily available, or obtaining professional services and outsourced services. This consists of personnel in a wide variety of roles which can include IT developers, legal, risk or compliance support resources, auditors, security guards and medical staff. These non-employee resources can be assigned to Citi premises or operate from supplier sites. As at the end of FY 2025, Citi Australia had 153 non-employees primarily engaged in operations support, with some in facilities management and general service providers, working both onsite and offshore in support of the Citi Australia business.

Overview of Citi Australia's supply chain

Citi strives to maintain responsible practices in its supply chain. Suppliers are expected to adhere to all laws applicable to them and comply with Citi's Requirements for Suppliers, which communicate relevant Citi policies and mandates, including supplier policies and practices designed to:

- Prohibit discrimination in the workplace;
- Minimise the risk of forced labour, trafficked labour and child labour occurring in Citi's operations and supply chains;
- Enforce working hours, remuneration and benefits in compliance with all applicable laws.

Citi's Statement of Supplier Principles outlines aspirational guidelines in the areas of ethical business practices, human rights in the workplace, healthy and safe working conditions and environmental sustainability. Suppliers are also asked to provide information which helps Citi understand whether the suppliers are adhering to regulatory requirements related to modern slavery, as well as Citi expectations related to human rights and labour practices. That process enables Citi to assess risk exposure, particularly for suppliers in higher-risk sectors and geographies.

Exposure to modern slavery risks

Risk Assessment

As a financial services organisation employing a highly skilled labour force, Citi Australia considers the risk of causing, contributing or being directly linked to modern slavery within its direct business operations to be low. However, Citi recognises that, through its supply chain, investments and customers, it can be indirectly exposed to risks of modern slavery.

The following pages provide an overview of ways Citi Australia may be exposed to modern slavery its operations, supply chain and financing of client activities, and describes the actions Citi Australia has taken to assess, mitigate and address these risks.

The table below summarises Citi Australia's assessment of risk in its business activities for FY2025.

Citi Australia's assessment of risk across business activities in FY2025.

		Modern Slavery Risk Rating	
Operations	Nature of risk	Inherent Risk	Residual Risk
Engagement of Workers	Cause	Low	Low
Client and Customer Activities	Be directly linked	Medium	Low
Managed/Operated Joint Ventures	Be directly linked	Low	Low
Equity and other investment	Be directly linked	Medium	Low
Charitable Activities	Be directly linked	Low	Low
Supply Chain	Be directly linked	Medium	Low

Engagement of Workers

As of the end of FY2025, Citi Australia had 816 employees based in Australia.

As of the end of FY2025, Citi Australia engaged 153 non-employees, primarily in operations support, with some in facilities management and general service providers, working both on-site and offshore in support of the Citi Australia business.

Risk Assessment and Preventive Actions

Citi Australia's business practices (such as its hiring and employment practices) have the potential to cause modern slavery. This risk however has been assessed as low due to adherence to robust laws and policies and procedures that support the value Citi places on a workforce consisting of the best talent from the broadest pools available and its lack of tolerance for unlawful discrimination across the employment lifecycle. This includes:

Direct employment

The majority of Citi Australia's workforce is directly employed in Australia, which is considered a low-risk geography due to the robust local employment law framework, including the Fair Work Act 2009 (Cth).

Global policies and procedures

Citi Australia adheres to a strong set of global policies and procedures to ensure fair and equitable treatment and remuneration of employees. This includes Citi's Code of Conduct, which is publicly available on our website in 18 languages, under which all members of Citi's workforce are responsible for creating a work environment free from discrimination, harassment and retaliation.

Recruitment processes

Citi Australia's employee screening process includes review of individuals' proof of identity, employment history and right to work in the country where the job is located, among other items.

Before joining, Citi Australia employee candidates are informed as to how they will be compensated for their work, and the specific terms and conditions of employment.

Citi Australia complies with applicable legislation in relation to employees' wages and working conditions.

A similar process is applied for non-employees, where the supplier, as the employer, is contractually obliged to screen personnel assigned to Citi Australia. Monitoring processes are in place to ensure suppliers meet their contractual obligations.

Employees are encouraged to provide feedback and suggestions for improvement through various channels, including Citi's global annual anonymous employee engagement survey, known as Voice of the Employee.

Clients and Customers' Activities

Risk Assessment and Preventive Actions

Effectively evaluating human rights risks relating to our clients, counterparties and the projects Citi finances is challenging. Citi continues to work diligently to meet this challenge and respect the human rights of the individuals and communities impacted by the clients and projects which are financed. The AML program, [including Citi's Know Your Customer ("KYC") protocols] and Citi's Environmental and Social Risk Management Policy ("ESRM"), are some of the key processes that help to mitigate the risk of modern slavery arising from these activities and the risk of inappropriate use of our services and products by Citi's clients.

Anti-Money Laundering (AML) client due diligence ("CDD")

The Australian Anti-Money Laundering and Counter-Terrorism Financing Act 2006 ("AML/ CTF Act") requires financial institutions to conduct client due diligence at the beginning of a commercial relationship, during the process of on-boarding a new client, and then periodically thereafter while a relationship remains in place, especially when material change events occur. CDD is performed on all customers in accordance with Citi's global AML Policy with enhanced CDD performed on customers who present a high money laundering risk.

Transaction monitoring

Citi Australia has a regulatory obligation to submit a Suspicious Matter Report ("SMR") if we suspect that a person or transaction is linked to a crime as defined in the AML/CTF Act. Upon detection of activity suggestive of potential human trafficking, Citi's AML intelligence units will submit a SMR to the regulator Australian Transaction Reports and Analysis Centre ("AUSTRAC") in accordance with SMR reporting obligations. The investigative unit will also undertake additional post-investigation actions, including recommending exit of client accounts to the business.

Project Finance

Citi's ESRM Policy prohibits Citi from directly financing projects or activities involving forced labour and harmful or exploitative forms of child labour. The ESRM Policy applies throughout the firm to (i) transactions above certain financial thresholds for the financial product type in question where there is an identified use of proceeds directed to a specific physical asset or project; (ii) client relationships covered by sector standards; (iii) client relationships flagged for elevated environmental, social or reputational risks for various reasons, including the ESRM Areas of High Caution.

The ESRM Policy's Areas of High Caution describe risk factors in client activities that can lead to elevated human rights risks that require enhanced due diligence at a client relationship level. Additionally, transactions supporting a project in countries or regions with a history of known human rights abuses relevant to the sector and/or weak enforcement of labour laws, particularly those requiring large migrant labour workforces, would result in ESRM enhanced due diligence on labour rights relevant to the specific project. Such project-related financing includes ESRM review of labour risk management practices such as ethical recruitment practices, prohibitions of identify document retention practices, adequate worker accommodations and appropriate worker grievance mechanisms. These plans, policies and practices are assessed against international labour standards for project-related transactions.

Managed/Operated Joint Ventures

Risk Assessment and Preventive Actions

The risk that Citi has the potential to be directly linked to modern slavery through partnerships, joint ventures and commercial relationships has been assessed as being low. This is due to the type of workers and nature of services being provided to Citi Australia and the strong risk controls frameworks and processes in place that mitigate these risks.

The nature of the services being provided to Citi Australia by TTS vendors and brokerage firms include payments platform and related technologies, transactional investment and/or financial services. These services are predominantly rendered by a highly skilled workforce, located in jurisdictions with strong worker protections with lower modern slavery risk levels. Similarly, the Markets business has commercial arrangements with brokerage firms to provide Citi Australia customers with access to investment products.

Onboarding process

Vendors and brokerage firms are screened pursuant to global client on-boarding protocols to mitigate risks. This screening includes an anti-bribery and corruption questionnaire, an anti-money laundering and sanctions screening, negative news checks, and annual broker reviews.

Global policies and standards

Any commercial arrangement with a vendor who interacts directly with customers on behalf of Citi Australia is covered by global policies and standards, including the New Products or Services, Complex Transactions, and Business Line Review Policy and the global Standard on New Products, Services and Lines of Business (New Activity Policy and Procedure), which provide the standards and approval framework for new products, services, capabilities and business operating models.

Equity & Other Investments

Risk Assessment and Preventive Actions

The risk of modern slavery occurring within Citi Australia's investment entities has been assessed as low.

As of 31 December 2025, Citi Australia only has one equity investment in the payment sector which is considered to have a low risk of modern slavery, and maintains the below global policies and standards to mitigate this risk.

Citi Australia has strict global policies and standards to establish whether each investment entity has appropriate policies and processes in place to mitigate modern slavery risks. Citi Australia's equity stake in investments is typically well below ownership or control of the entities.

Global policies and standards

- Citi Equity Investment Policy and Citi New Activity Policy

  These policies apply to all proprietary equity and equity-like or other investments and require approval by the sponsoring business and all relevant control functions including regional and/or global New Activity Committee and/or equivalent committee. These approvals are subject to AML, due diligence and other thorough assessments of risk. Where necessary, additional control functions such as the Environmental and Social Risk Management ("ESRM") or the Sustainability & ESG team are brought into the approval process to consider and assess the risks of modern slavery.

- The ESRM Policy

  The ESRM Policy applies to equity investments of USD 5 million or more and expressly prohibits financing of production or activities involving modern slavery, human trafficking or forced labour.

Charitable Activities

Risk Assessment and Preventive Actions

The risk of modern slavery occurring within Citi Australia's charitable activities is low. Non-profit, charitable organisations receiving a Citi funded charitable contribution or event payment are onboarded through a global, standardised process governed by the Third-Party Management Policy. This process includes anti-bribery & corruption due diligence, sanctions screenings, reputation checks, and conflict of interest verifications.

Additionally, during the onboarding process and on an ongoing basis as part of Citi's Ongoing Supplier Monitoring Program, these organisations are asked to attest that they 1) have appropriate policies and procedures in place that comply with national or local labour laws, including prohibitions against forced labour, and 2) make efforts to contract only with vendors that are similarly compliant.

Organisations receiving grants from the Citi Foundation, a U.S.-based private foundation and separate legal entity, are subject to the same onboarding process noted above.

Supply Chain

Due Diligence

Citi aims to have a positive impact on people, the environment and the economy through our supply chain decisions. Citi seeks to work with suppliers that share values, and set high standards for performance, measurement and responsible business practices. To reduce modern slavery risk in its supply chain, Citi Australia monitors its active suppliers through its global third-party management process which includes the following:

Citi Requirements for Suppliers

The Citi Requirements for Suppliers policy prohibits specific practices that are indicators of forced labour or human trafficking and require all suppliers to:

- Adhere to all applicable laws and conduct their operations in accordance with the Citi Requirements for Suppliers.
- Have policies and procedures designed to ensure compliance with all of their key obligations, including but not limited to appropriate non-discrimination and non-retaliation policies.
- Make reasonable efforts to monitor and ensure their supply chain is compliant with Citi's requirements
- Affirm that they have received and read the Citi Requirements for Suppliers upon on-boarding to Citi Australia.

Corporate Responsibility Questionnaire ("CRQ")

This questionnaire helps the procurement team determine how potential and current suppliers manage social issues, including human rights issues. The CRQ has been enhanced and expands on previous questions in the areas of modern slavery.

Based on a supplier's risk profile, the CRQ triggers specific follow-up questions relating to potential practices indicative of modern slavery practices. They relate to prohibiting the withholding of worker identity documents, prohibiting the use of labour brokers who do not meet the Citi Requirements for Suppliers and/or who charge recruitment fees to workers, requiring the provision of detailed contracts in a language understood by the worker, and allowing workers terminate their employment upon reasonable notice.

Citi's Resource Management Organisation staff are assigned modern slavery training.

2025 Risk Assessment

During FY2025, Citi Australia conducted a re-assessment of its supply chain, and the outcome did not change from the overall supply chain risk profile or ratings since the last assessment. Based on Citi Australia's risk matrix which was developed based on the UN Guiding Principles and Global Slavery Index and continues to be updated over time, the assessment identified a breakdown of **Citi Australia's external suppliers** across the following sectors (high-medium-low):

- **High Risk:** suppliers in electronics (electronics includes laptops, computers and mobile phones); information technology; call centre operations
- **Medium Risk:** suppliers in business operations and services; information services, information technology, network and communications services; non-employee insurance and HR services; office equipment and supplies; professional services; real estate; travel services
- **Low Risk:** suppliers in business operations & services; employee benefits; information services; network and communications services; professional services; insurance and HR Services.

In addition to sector assessment, in FY2025 all new suppliers onboarded by Citi Australia were assessed for modern slavery country risk using data drawn from the Global Slavery Index. This assessment uses a combination of prevalence rating, government response rating and vulnerability rating to determine country risk. The country risk and sector risks are combined to form the overall supplier modern slavery risk rating.

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Taking action

2019	2020	2021	2022	2023	2025
Established Citi Australia modern slavery working group	Developed a standard modern slavery clause to be included in any prospective sponsorship contracts	Commenced participation in Australia Banking Association (ABA) modern slavery and Human rights working group	Developed modern slavery questionnaire and risk assessment for its investments	Further enhancements to the CRQ process	Further CRQ enhancements - 19 specific Modern Slavery related key words into its media screening processes
Delivered modern slavery training to procurement and vendor management teams	Updated Citi's Statement of Supplier Principles to ensure that it clearly expressed to our suppliers our expectations that they work towards identifying, preventing and mitigating the risks of all forms of modern slavery in their own operations and supply chains	Embedded modern slavery risk assessment into Outsourcing approval process	Further expanded and enhance the CRQ		Gap Analysis commenced on AML/ CTF Reform. Opportunities identified in relation to risk assessment, due diligence, and monitoring frameworks will be implemented in 2026-2027

2019	2020	2021	2022	2023	2025
Risk Assessment of our entire supply chain	Developed modern slavery clause for inclusion in vendor contracts	The Business Risk and Controls Committee (BRCC) approved the inclusion of Modern Slavery risk into escalation criteria	Enhanced an existing comprehensive modern slavery awareness training		Further updates to Citi Australia's risk matrix and conducting re-assessment of supply chain
Citi Australia updated its standard contractual terms for new suppliers for goods and services	Citi revised its Corporate Sustainability Assessment		Inclusion of Modern slavery risks considerations within Citi Australia's risk and compliance governance committees		
	Updated Citi's Standards for Suppliers to ensure that it sets out the standards that our suppliers are expected to comply with in relation to modern slavery		The Operational Risk Management Council charter was updated to reference Modern Slavery issues as an example of reputational risk items that needs to be tabled to the council		

Note: Following a global restructuring exercise in April 2024, a number of governance committees including the BRCC have been merged into the Country Coordinating Committee, however the modern slavery agenda remains a standing item for the existing governance committee.

Key actions taken in FY 2025

- Continuous enhancement is being made to the CRQ process to ensure a consistent approach is taken to assess whether its suppliers meet Citi's wide range of human rights and sustainability standards, where appropriate. The CRQ has been strengthened by integrating 19 specific Modern Slavery related key words into its media screening processes.
- Citi Australia has a robust Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) program and framework. The program commenced enhancements in line with the AML reforms which will be implemented throughout 2026 and 2027. These enhancements will strengthen customer due diligence and enhanced ongoing monitoring, which will assist in the identification and management of modern slavery risks.

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Assessing effectiveness of modern slavery risk management

Key Monitoring Metrics for FY2025

Suppliers	**100% of suppliers** on-boarded in FY2025 have accepted the Citi Standards for Suppliers and Modern Slavery provisions.
Investments	Modern slavery due diligence was conducted for the investments that Citi Australia held in FY2025, **with no modern slavery risk noted.**
Employees	Citi Australia employees **periodically complete mandatory training** on multiple topics including Citi's Code of Conduct, and various risk and control related topics.
Customers	**100% of new clients** onboarded are subject to AML name screening for negative news and Sanctions screening. The onboarded and existing clients are subject to Citi's AML Transaction Monitoring program, where applicable and ongoing name and Sanctions screening is undertaken. These processes prevent the on-boarding and ongoing relationship of a client potentially associated with modern slavery concerns or potential connections to modern slavery upon further investigation.

Enhancing effectiveness in future reporting periods

Citi Australia remains committed to sharing our progress and learnings to improve on the effectiveness of Modern Slavery risk management activities from previous years. In future reporting periods, we intend to review the below processes:

- **Risk Identification:** Continue to strengthen modern slavery risk detection and risk assessment processes. As global frameworks and processes are developed and enhanced, Citi Australia is well positioned to leverage these improvements to uplift its approach to identifying and managing modern slavery risks. This is demonstrated by enhancements made in CRQ as discussed in the 'Taking Action' section above.
- **Risk Escalation and Monitoring:** Continue to embed modern slavery risk management within existing governance structures, including the provision of bi-annual updates from management to the Country Governance Committees and relevant Boards. The importance of modern slavery is expected to increase, with additional jurisdictions—such as New Zealand—proposing legislative reforms to introduce obligations relating to modern slavery reporting and statements. Strengthening oversight and monitoring will ensure the organisation remains well positioned to meet evolving regulatory and stakeholder expectations.

Citi's Governance, Policies and Procedures

Governance

Respecting human rights is a shared responsibility across the firm. Citi Australia's business implements and utilises policies and governance structures established by its global parent, Citi. The firm's global approach to identifying, assessing, and managing human rights and related risks is approved by senior management and reviewed by the Nomination, Governance, and Public Affairs Committee ("NGPAC"). The NGPAC oversees Citi's governance, as well as key sustainability and human rights policies and programs, and monitors management's engagement with investors and external stakeholders.

Operationally, Citi's Chief Sustainability Officer ("CSO") leads the Sustainability and Environmental Social Governance ("ESG") team and develops Citi's sustainability strategy, including Citi's approach to human rights in close partnership with Citi's businesses and functions, including Risk Management and Operations. The CSO provides updates to the NGPAC on key issues, trends and results.

Modern slavery risks related to Citi's clients are primarily addressed by three functions: Citi's global Environmental and Social Risk Management ("ESRM"), Anti-Money Laundering ("AML") and TPM:

- The ESRM team within the Sustainability and ESG Team governs the implementation of Citi's ESRM Policy for client transactions with potential environmental and social risks;
- Citi's global AML function within Independent Compliance Risk Management has responsibility throughout the firm for the client and transactional due diligence policy on AML risk, including those related to modern slavery. The business use the AML frameworks and policies and associated controls to help manage modern slavery risks; and,
- Modern slavery risks related to Citi's supply chain are managed by Procurement and TPM teams who are responsible for supplier contracting and purchasing, and TPM provides the associated risk governance structure.

These functions work collaboratively with other enterprise functions at Citi to ensure our policies and procedures meet the legal requirements of jurisdictions in which we do business while respecting internationally recognised human rights and associated standards.

To learn more about Citi Australia's values, governance structure and policies on human rights and other social and environmental issues, please visit the Environmental and Social Information section of our global Corporate Governance page.

Raising Concerns

- There are multiple channels available to Citi Australia's workforce, and any third party, to raise concerns relating to modern slavery, including Citi's global Ethics Hotline. Concerns may be reported anonymously to the extent permitted by applicable laws and regulations. When concerns are raised with respect to potential misconduct, Citi seeks to conduct investigations thoroughly, fairly, with discretion and in a timely manner. Violations of Citi's Code of Conduct, laws, rules, regulations, or Citi policies, standards or procedures may result in disciplinary action up to and including termination of employment.
- Citi prohibits any form of retaliatory action against anyone who raises concerns or questions in good faith regarding ethics, discrimination, or harassment matters or reports suspected violations of other applicable laws, regulations, or policies; or those who participate in a subsequent investigation of such concerns, or concerns raised under the Citi Australia Whistleblower Policy. Retaliation is a serious issue and includes any adverse action taken because an individual has raised a concern or question, reported a violation, or been involved in an investigation. As part of any investigation, Citi respects the rights of all parties under applicable laws and regulations. Employees who engage in retaliation against a colleague are subject to disciplinary action, up to and including termination of employment.
- During the FY2025 period, there were no matters raised through any of the abovementioned channels in relation to modern slavery.

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Citi's Governance, Policies and Procedures

Policies and Procedures

Citi Australia's global parent company, Citi has issued statements and created global policies in relation to human rights and labour issues that encompass our commitment to contributing to the work of identifying and addressing modern slavery risks, including the following, which are periodically updated:

- Citi's Statement on Human Rights, which expresses our support for the protection and promotion of human rights, including those in the United Nations Universal Declaration of Human Rights and the International Labour Organisation's Core Conventions, which encompass forced labour and child labour;
- Citi's Code of Conduct, which sets forth our values and standards, including those regarding the treatment of our employees, clients, business colleagues and communities, emphasises an environment of mutual respect, and prohibits discrimination and harassment in any form. The Code of Conduct provides mechanisms, such as our global Ethics Hotline, for addressing concerns from members of our workforce, supply chain participants, or the public;
- Citi's Environmental and Social Policy Framework, which encapsulates our approach and the standards we apply to environmental and social risks in the financing of our clients' activities;
- Citi's Statement of Supplier Principles, which communicates our expectations on human rights and labour issues to our suppliers;
- Citi's Requirements for Suppliers, which facilitate compliance by suppliers with Citi policies and expectations in the course of providing services to Citi and contain specific prohibitions against the key elements of modern slavery; and
- Citi's Global AML policies and KYC protocols, which screen for a variety of financial crimes and designate human trafficking as among the most severe types of financial crimes that may cause extreme money laundering risks.

These policies and principles are applied across Citi's global operations, including all entities covered by this statement. Citi is also a signatory to the United Nations Global Compact, whose Ten Principles include the elimination of all forms of forced and compulsory labour and the effective abolition of child labour. In addition, Citi supports the UN Guiding Principles and works to implement the corporate responsibility to respect human rights. Refer to Citi Statement on Human Rights and our Global FY2024 Sustainability Report.

Sustainability Resources | Citi

Consultation and Approval

As part of the process to complete this FY2025 Statement, Citi Australia's management remain responsible for the coordination of the flow of information and feedback between the Boards and the relevant Citi Australia reporting entities. In FY2025 there were no items relating to modern slavery that were required to be presented to the Country Coordinating Committee ("CCC"), the CBNA Sydney Branch Senior Officer outside Australia (SOoA) or respective Boards, other than the annual update and approval of the Modern Slavery Statement.

During the reporting period, if there was any such reportable information, the respective CCC, SOoA and Boards would be engaged and provided with updates on the progress of actions (if any) undertaken by Citi Australia's management on modern slavery.

As outlined earlier, each of CPL, CGMA and CGMAH own and control subsidiary entities ("relevant subsidiaries"). There were no items relating to modern slavery that were reported to the Boards of these relevant subsidiaries or escalated to the Citi Australia reporting entities during the relevant reporting period. To the extent that a modern slavery issue arose, the Citi Australia reporting entities would consult with the relevant subsidiaries on the appropriate actions to take.

In accordance with section 14(2)(d)(iii) of the Act, this Statement has been approved by the principal governing bodies of each of Citigroup Global Markets Australia Pty Limited, Citigroup Global Markets Australia Holdings Pty Limited and Citigroup Pty Limited (i.e., more than one reporting entity covered by the Statement).

The Statement has also been approved by the Citibank N.A. Senior Officer outside Australia **("SOoA")**, on behalf of Citibank N.A, who, pursuant to the requirements under APRA Prudential Standard CPS 510 Governance, is the nominated senior officer outside Australia with delegated authority from the Citibank N.A. Board of Directors and has responsibility for overseeing CBNA Sydney's operations. The SOoA position is akin to a quasi-Board and the SOoA is a designated "accountable person" under the Financial Accountability Regime ("FAR") in their oversight role.

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This Statement was approved by the Citigroup Pty Limited Board, the principal governing body for the reporting entity on 26 June 2026.

Mark Woodruff
Chief Executive Officer and Director

This Statement was approved by the Citigroup Global Markets Australia Pty Ltd Board, the principal governing body for the reporting entity on 26 June 2026.

Mark Woodruff
Director

This Statement was approved by the Citigroup Global Markets Australia Holdings Pty Ltd Board, the principal governing body for the reporting entity on 26 June 2026.

Mark Woodruff
Director

This Statement was approved by the Senior Officer outside Australia, on behalf of Citibank N.A on 26 June 2026.

Marc Luet
Senior Officer outside Australia

Appendix

	Mandatory Reporting Criteria	Citi's Approach/Location in Modern Slavery Statement
1.	Identify the reporting entity	Citi's structure, Organization and Business Construct
2.	Describe the reporting entity's structure, operations and supply chains	Citi's structure, Business Operations and Supply Chain
3.	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Risk assessment, Due Diligence and Preventive Action
4.	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Risk assessment, due diligence and preventive action processes Citi's governance, policies and procedures related to modern slavery risks
5.	Describe how the reporting entity assesses the effectiveness of these actions	Monitoring Effectiveness
6.	Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement), and	Citi's structure, Business Operations and Supply Chain Consultation between reporting entities
7.	Provide any other relevant information	Raising concerns

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