



## **Political Contributions and Lobbying Statement**

Citigroup's Board of Directors has adopted these basic guidelines relating to Citigroup Political Action Committee (PAC), corporate political contributions, and lobbying activities.

### **Political Contributions**

Contributions are made in accordance with these guidelines as permitted under federal, state and local laws to help elect candidates whose views and positions are favorable to Citigroup, our industry, and ultimately the free-market economy. These contributions come from the voluntary, employee funded Citigroup PAC or, when permitted, from corporate funds, and are made to candidates who demonstrate integrity and character, support a strong private sector and show a free enterprise philosophy. Citigroup does not use corporate funds for independent expenditures.

### **Lobbying**

Citigroup Global Government Affairs (GGA) staff actively lobby on issues that impact the company and our ability to do business. Citigroup has built a world-class Global Government Affairs team of seasoned professionals to represent the interests of all Citigroup businesses in the public policy arena. Members of the team come from diverse political, geographic and socio-economic backgrounds and work together to create value for Citigroup businesses through legislative lobbying and serving as the "faces" of Citigroup with international, federal, state and local elected officials. As outlined in the [Citi Code of Conduct](#), only the GGA team and the Municipal Securities Division (because of MSRB Rules) are authorized to lobby or retain lobbyists on behalf of Citigroup. GGA professionals are required to attend training on applicable laws and internal compliance policies, and are expected to demonstrate the highest standards of professional integrity.

A key reason for consolidating the government relations function for all Citigroup businesses within the GGA team was to ensure that at all times, our political outreach is focused on the holistic, long-term interests of Citigroup clients, shareholders and employees, rather than the short-term interests of a specific business line. It is the role of the GGA team to not only respond to legislative agendas, but to proactively promote the interests of Citigroup businesses and forecast political and legislative trends that can impact Citigroup businesses in the long-term.

Citi has made a commitment not to use funds received under the Troubled Assets Relief Program ("TARP") for lobbying or government relations activities.

### **Compliance and Oversight**

To ensure compliance with applicable laws and public disclosure obligations all political contributions are reviewed and approved by Citigroup's GGA and General Counsel offices.

### **Annual Report to Shareholders**

Citi makes available to its shareholders and stakeholders a list of all corporate political contributions and contributions made by Citigroup's PAC. This [list](#) is updated and posted on our website annually in March.

If you have any questions regarding these guidelines or Citigroup's political activities, please contact the office of Global Government Affairs.

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