Citibank N.A, UAE
Annual Pillar III Disclosures

31 December 2021

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1. Introduction to Citibank NA UAE

Citibank NA United Arab Emirates branch operates in the United Arab Emirates ("UAE") through its four branches (2021: four) located in the Emirates of Abu Dhabi, Dubai and Sharjah under a license issued by the Central Bank of UAE ("CBUAE").

The principal activities of the Bank include accepting deposits, granting loans and advances and providing consumer and corporate banking, including treasury activities.

The registered office and the address of the Bank is P.O. Box 749, Dubai, UAE.

The Bank is a branch of Citibank N.A. USA. The ultimate holding company of the Bank is Citigroup Inc.

This disclosure reflects the activities of the Branches in the United Arab Emirates only and exclude all transactions, assets and liabilities of the head office and its other branches elsewhere. Since the capital of the Bank is not publicly traded, no segment analysis has been prepared.

2. Basis of Preparation

The purpose of this public disclosure is to provide detailed information on Citibank NA UAE Branch ("Citi UAE") capital structure, capital adequacy, risk exposure and risk-weighted assets ("RWA"), leverage ratio and liquidity ratios as of 31 December 2021.

The following public disclosure presents the annual Pillar 3 disclosure of Citi UAE which has been prepared in accordance with the Central Bank of UAE Notice No CBUAE/BSD/N/2021/5508 dated 30 November 2021 on "Pillar 3 Templates and Explanatory Notes".

The Pillar 3 Disclosure document has been prepared and presented using local currency – UAE Dirhams (AED'000).

3. Management's Responsibility Statement

Citi UAE management is responsible for the preparation and fair presentation of the annual financial statements of the Branch, comprising the statement of financial position as of 31 December 2021, and disclosure requirements.

The Pillar 3 Disclosure document has been verified internally by senior management in accordance with Citi's policies on financial reporting and disclosures.

4. Overview of Risk Management and RWA

4.1 Template KM1: Key Metrics (Quarterly)

The below key prudential metrics relate to regulatory capital, leverage ratio and liquidity standards related to Citi UAE. Citi UAE capital and leverage position is managed within the risk appetite framework. No transitional arrangement with regards to implementation of IFRS9 for the impact of expected credit loss accounting on regulatory capital have been applied for Q2-2021 until Q4-2021.

Citi UAE is subject to regulatory capital standards issued by Central Bank of UAE. Citi UAE manages its balance sheet proactively, with a particular focus on the efficient management of RWA.

Citi UAE is not highly leveraged, with a leverage ratio of 5.07%, above the minimum leverage ratio requirement of 3%.

		a	b	c	d	e
		T	T-1	T-2	T-3	T-4
	Available capital (amounts)					
1	Common Equity Tier 1 (CET1)	2,347,348	2,367,080	2,391,786	2,430,988	2,501,732
1a	Fully loaded ECL accounting model	2,347,348	2,367,080	2,391,786	2,393,131	2,396,910
2	Tier 1	2,347,348	2,367,080	2,391,786	2,430,988	2,501,732
2a	Fully loaded ECL accounting model Tier 1	2,347,348	2,367,080	2,391,786	2,393,131	2,396,910
3	Total capital	2,530,992	2,545,059	2,547,089	2,584,864	2,660,308
3a	Fully loaded ECL accounting model total capital	2,530,992	2,545,059	2,547,089	2,547,303	2,556,305
	Risk-weighted assets (amounts)					
4	Total risk-weighted assets (RWA)	18,521,550	17,857,560	16,545,121	16,287,764	16,642,042
	Risk-based capital ratios as a percentage of RWA					
5	Common Equity Tier 1 ratio (%)	12.67%	13.26%	14.46%	14.93%	15.03%
5a	Fully loaded ECL accounting model CET1 (%)	12.67%	13.26%	14.46%	14.67%	14.35%
6	Tier 1 ratio (%)	12.67%	13.26%	14.46%	14.93%	15.03%
6a	Fully loaded ECL accounting model Tier 1 ratio (%)	12.67%	13.26%	14.46%	14.67%	14.35%
7	Total capital ratio (%)	13.67%	14.25%	15.39%	15.87%	15.99%
7a	Fully loaded ECL accounting model total capital ratio (%	13.67%	14.25%	15.39%	15.62%	15.30%
	Additional CET1 buffer requirements as a percentage of RWA					
8	Capital conservation buffer requirement (2.5% from 2019) (%)	2.50%	2.50%	2.50%	2.50%	2.50%
9	Countercyclical buffer requirement (%)	0	0	0	0	0
10	Bank D-SIB additional requirements (%)	0	0	0	0	0
11	Total of bank CET1 specific buffer requirements (%) (row 8 + row 9+ row 10)	2.50%	2.50%	2.50%	2.50%	2.50%
12	CET1 available after meeting the bank's minimum capital requirements (%)	3.17%	3.75%	4.89%	5.37%	5.49%
	Leverage Ratio					
13	Total leverage ratio measure	46,316,054	NA	NA	NA	NA
14	Leverage ratio (%) (row 2/row 13)	5.07%	NA	NA	NA	NA
14a	Fully loaded ECL accounting model leverage ratio (%) (row 2A/row 13)	5.07%	NA	NA	NA	NA
14b	Leverage ratio (%) (excluding the impact of any applicable temporary exemption of central bank reserves)	NA	NA	NA	NA	NA
	Liquidity Coverage Ratio					
15	Total HQLA	NA	NA	NA	NA	NA
16	Total net cash outflow	NA	NA	NA	NA	NA
17	LCR ratio (%)	NA	NA	NA	NA	NA
	Net Stable Funding Ratio					
18	Total available stable funding	NA	NA	NA	NA	NA
19	Total required stable funding	NA	NA	NA	NA	NA
20	NSFR ratio (%)	NA	NA	NA	NA	NA
	ELAR					
21	Total HQLA	15,568,936	13,954,945	15,039,406	11,242,611	10,481,352
22	Total liabilities	35,726,690	35,246,109	34,353,529	25,431,537	24,859,904
23	Eligible Liquid Assets Ratio (ELAR) (%)	43.58%	39.59%	43.78%	44.21%	42.16%
	ASRR					
24	Total available stable funding	28,553,590	27,950,903	26,701,132	31,067,265	29,669,140
25	Total Advances	10,680,241	12,190,079	11,257,530	11,479,757	9,516,212
26	Advances to Stable Resources Ratio (%)	37.40%	43.61%	42.16%	36.95%	32.07%

4.2 Template OVA: Bank Risk Management Approach (Annual)

Credit Risk

The mission of Citi UAE is to responsibly provide financial services that enable economic growth and progress as a trusted partner to its clients and to deliver sustainable, growing earnings across all its businesses while protecting capital and liquidity.

Citi UAE has a comprehensive risk governance framework in place to provide oversight of the Branch's monitoring and management of risks, ensuring that the risk profile of Citi UAE is well documented and pro-actively managed at all levels of the organisation so that Citi UAE's financial strength is safeguarded. The framework applies to Citi UAE in its entirety, including all businesses and functions.

Risk governance at Citi UAE is cascaded through risk frameworks and risk policies, which describe how Citi UAE identifies, measure, mitigates, monitors and reports material risk. This ensures transparent lines of responsibility and accountability for the core risk governance processes performed by the Branch.

The risk management framework is based on a 'three lines of defense' governance model, whereby each line has a specific role and defined responsibilities in such a way that the execution of tasks is separated from the control of the same tasks. The three lines of defense also collaborate with each other in structured for and through formalised processes to bring various perspectives together and to lead the Branch toward outcomes that are in clients' and shareholders' interests, create economic value and are systemically responsible.

Each of Citi UAE's businesses (the first line of defense) owns and manages the risks inherent in or arising from the business and is responsible for establishing and operating controls to mitigate key risks, performing manager assessments of the design and effectiveness of internal controls, and promoting a culture of compliance and control.

Citi UAE's independent control functions (the second line of defense), including Independent Risk Management, Independent Compliance Risk Management, Legal, and Human Resources ("HR"), set standards against which business, operations and control functions are required to manage and oversee risks, including compliance with applicable laws, regulatory requirements, and policies and standards of ethical conduct. These functions are involved in identifying, measuring, monitoring, or controlling aggregate risks, and are independent from front line units.

Citi UAE's Internal Audit function (the third line of defense) independently reviews activities of the first two lines of defense, based on a risk-based audit plan and methodology approved by the Audit Committee.

These disclosures provide details of Citi UAE's exposure to risk and describes the methods used by management to manage risk. The most important types of financial risk to which Citi UAE is exposed is credit risk, liquidity risk, market risk and operational risk. Market risk includes currency risk, interest rate risk and equity price risk.

Business model determines and interacts with overall risk profile through the governance forums (CCC, BRCC, ALCO & RMCF), business planning, franchise reviews, cost of credit forecasting and the ICAAP process.

Risk Mangers monitor limits, ratings and classification, exposure through the various risk measurement systems (Citi Risk Credit, Citi Risk & Control) etc.

Market Risk

Risk appetite describes the aggregate level and types of risk that a firm is willing to take to achieve its strategic objectives and business plan. Risk appetite is mechanized through a set of carefully calibrated boundaries and monitored through robust reporting. Treasury Risk covers Market Trading Risk, Liquidity Risk and Interest Rate Risk in the Banking Book (IRRBB) for Citi UAE. From Treasury Risk perspective, Risk Appetite is defined through the use of approved limits against various metrics. Limits are approved by independent Risk and Citi UAE ALCO, and are set in accordance with the Treasury Risk Appetite Framework (RAF). RAF is designed to balance business ownership and accountability for risks with well-defined independent risk management oversight and responsibility. Further, the risk management organization is structured to facilitate the management of risks across three dimensions: businesses, regions, and critical products. In line with the limits set, Treasury then takes selective risks in support of it's Mandates and Strategy.

The overall governance structure and responsbilities, is broken down into the lines of defence:

- First Line of Defense: Includes Front Line Units (such as Treasury) and Front Line Unit activities. They are responsible and held accountable for managing the risks associated with their activities within the boundaries set by independent risk management.
- Second Line of Defense: Includes Independent Risk Management (Treasury Risk Management). They are responsible for overseeing the risk-taking activities of the first line of defense and challenging the first line of defense in their execution of their risk management responsibilities in addition to independently identifying, measuring, monitoring, and controlling aggregate risks. Treasury Risk also has the responsibility of escalating any breaches to senior management in line with Citi's Risk Appetite, Limit, and Threshold Management Procedure.
- Third Line of Defense: Includes Internal Audit. Responsible for independent assurance to the Board on the effectiveness of governance, risk management and internal controls.
- Control and Support Functions: Includes functions that do not meet the definition of front-line unit, independent risk management or internal audit. They are expected to design, implement, and maintain an effective control environment, supportive of safety and soundness. Any front-line unit activities within control and support functions remain subject to challenge by independent risk management.

In the event of a breach of pre-set thresholds/limits or any policy violation, Citi UAE Treasurer must notify the Treasury Risk Manager, Cluster Treasurer, Regional Treasurer, and relevant stakeholders of the breach, its root cause and remediation plan. Treasury Risk then escalates with the senior chain to Regional Treasury Risk Manager, along with all details. It must also be ensured that escalation of the breaches and details is made to local ALCO. ALCO is the key governance forum where all issues relating to Treasury Risk is discussed and escalated to. All Treasury related limits ultimately are approved by ALCO, once Treasury Risk provides approval.

Risk, Comliance and HR polices, esclation procedures as well as policies related to limit breaches and notification criteria (portfolio level, board level etc).

Citi has different systems to monitor Market Trading Risk, Liquidity Risk, and Interest Rate Risk in the Banking Book (IRRBB). Risk Reporting teams ultimately use these systems to generate reports for Treasury and Risk. Reporting for Liquidity and Market Risk is done daily, and IRRBB is monthly. It is ultimately the responsibility of Treasury to ensure the completeness and integrity of risk reports and metrics and effective reporting of the data into the risk aggregation system, in partnership with Risk Reporting teams. Treasury Risk also leverages a global internal platform called 'Citi Risk' to escalate and record any breaches of limits to senior management.

ALCO is the key goverance forum for Treasury and Treasury Risk. ALCO is held on a monthly basis where Treasury presents all key metrics/reports related to Market Trading Risk, Liquidity Risk, and Interest Rate Risk in the Banking Book (IRRBB) as of the particular month end date.

Market Risk report highlights key FX exposures, overall Trading VaR, interest rate risk delta exposure against limits broken down at a currency level. Liquidity Risk report highlights key balance sheet metrics against thresholds (such as deposit to loan ratio, concentration ratios, etc), along with balance sheet stress metrics against triggers and limits. The IRRBB report highlights movement of moving interest rates on the balance sheet and the impact to net interest income and overall equity (against preset triggers).

Citi UAE performs simulated liquidity scenario (long term and short term) stress testing. The scenario includes assumptions about significant changes in key funding parameters. The results of scenario tests are reviewed to ensure that Citi UAE has sufficient liquidity, including in stressed scenarios, across all tenor buckets. This scenario assumes market, credit and economic conditions are moderately to highly stressed with potential further deterioration, and is used to measure a 12-month and 30-day survival horizon.

For Market Trading Risk stress testing, this is performed on a regular basis to estimate the impact of extreme market movements. It is performed on individual positions and trading portfolios, as well as in aggregate inclusive of multiple trading portfolios. Citi's independent market risk management organization, after consultations with the businesses, develops both systemic and specific stress scenarios, reviews the output of periodic stress testing exercises, and uses the information to assess the ongoing appropriateness of exposure levels and limits.

For IRRBB, various Interest Rate stress shocks (e.g. +/-100bp, +/-200bp) are applied on the balance sheet to assess the impact on net interest income (NII) and to measure the impact of interest rate changes vs. the firm's capital (Economic Valuation Sensitivity – EVS). Addition stress testing on IRRBB is also performed using historical and hypothetical scenarios. The results of these stress tests uses is to assess the ongoing appropriateness of exposure levels and to set limits in line with Risk Appetite Framework.

Total and granular DV01 by currency (factor sensitivty) is monitored on a daily basis, and reports are prepared and shared to stakeholders by an independent reporting function. AFS (banking book investment) hedging is done out of a portfolio maintained in Citi London. Capital, along with unpaid profits, are hedged with Citi Treasury Investments desk in London. The total amount hedged is increased/decreased on a monthly basis to ensure the hedge matches the reported outstanding capital plus unpaid profits.

Operational Risk

Citi UAE's goal is to keep operational risk at appropriate levels relative to the characteristics of its businesses, the markets in which it operates, its capital and liquidity, and the competitive, economic and regulatory environment. The entity recognizes that operational risk is inherent in its global business activities and related support processes. To anticipate, mitigate and control operational risk, the entity follows Citi-wide policies, and the institutional framework for assessing, monitoring and communicating operational risks and the overall operating effectiveness of the internal control environment across Citi. Citibank NA UAE also recognizes that operational risk can occur broadly and has impact beyond financial losses. Local Management has implemented a Manager's Control Assessment (MCA) program that relies on key indicators across various operational risk categories and established methodologies and tools to facilitate monitoring where appropriate so that any exceptions and / or negative trends are captured in operational risk management reporting.

Citibank UAE has adopted the 'Three Lines of Defense' Governance Structure for effective management of Operational Risk. The Roles and Responsibilities of the Three Lines of Defense are as follows:

- First Line of Defense: owns the risks inherent in or arising from their business and is responsible for identifying, assessing and controlling those risks so that they are within risk appetite. These units may also conduct control and support activities.
- Second Line of Defense: is defined to include the following organizational units - (i) Independent Compliance Risk Management (ICRM) and (ii) Independent Risk Management. The ICRM organization is designed to oversee and challenge products, functions, jurisdictional activities and legal entities in managing compliance risk, as well as promoting business conduct and activity that is consistent with Citi's Mission and Value Proposition and the Compliance Risk Appetite. The Independent Risk Management organization sets risk and control standards for the first line of defense and actively manages and oversees aggregate credit, market

(price and interest rate), liquidity, strategic, operational, compliance and reputation risks across the firm, including risks that span categories, such as concentration risk.

- Third Line of Defense: The role of Internal Audit is to provide independent and timely assurance to the Citigroup and CBNA Boards, the Audit Committees of the Boards, senior management and regulators regarding the effectiveness of governance, risk management and controls that mitigate current and evolving risks and enhance the control culture within Citi.

The respective businesses / functions are responsible for monitoring the metrics against the set thresholds on Quarterly basis and submit the results to the Country Coordinating Committee (CCC) and Business Risk and Controls Committee (BRCC).

If any of the metrics breach the established thresholds the root cause analysis and corresponding corrective action plans are also be brought to the attention of the CCC and BRCC.

The following are tools/ techniques for Operational Risk Identification and Assessment in Citibank NA UAE.

- Internal Operational Risk Loss Data
- Managers Control Assessment (MCA)
- Product and System Change Assessment

Gathering of Internal Loss Data

All Internal Operational Risk Events ("Event") are required to be reported into Citi Operational Risk LCS (Loss Capture System) designed to capture and store information related to internal operational risk events.

Manager's Control Assessment (MCA)

The Manager's Control Assessment (MCA) is a comprehensive self-assessment program, methodology and tool to support managers in mitigating their risks through consistent:

- Risk and control identification
- Risk and control assessment and monitoring
- Residual risk management

MCA allow management to enable risk and control identification, assessment & monitoring and residual risk management for all Governance, Risk & Compliance (GRC) Risks. MCA is focused on the most significant risks and key controls, i.e., the controls that mitigate those significant risks. MCA provides Citi's Management and Independent Risk and Control Functions a holistic view of Residual Risk and insight into trends & drivers for their Business or function.

Product and System Change Assessment

Citibank UAE follows the New Products or Services, Complex Transactions, and Business Line Review Policy (NPAC).

The objective of the NPAC Policy is to ensure that new products or services and complex transactions manufactured or provided by Citi (or by third parties for distribution to Citi clients), and new business lines or expansions of existing business undergo a transparent, consistent, rigorous, documented, and auditable review and approval process for the identification and evaluation of significant risks to Citi and its clients

Citibank UAE also follows the ORM New Product Approval Procedures which establish common protocols and procedures for interaction by Operational Risk Management with each of the New Product Approval Committees. These Procedures include ORM roles and responsibilities.

The Business Risk and Control Committee (BRCC) for Citibank UAE provides governance and oversight for compliance and operational risks. The mandate of the UAE BRCC is to govern and oversee that all compliance and operational risks material to its scope and mandate are adequately identified, monitored, reported, managed, and escalated, and appropriate action is taken in line with the firm-wide strategic objectives, risk appetite thresholds, and regulatory expectation, while promoting the culture of risk awareness and high standards of culture and conduct. Citibank UAE BRCC receives risk & control updates from business, O&T and support functions. UAE BRCC has a reporting line to the Emerging Markets (EM) BRCC. and is also subject to EMEA regional oversight from the EMEA Governance Committee, the EMEA Operational Risk Forum, and Regional Heads of Business Sectors and Functions.

The Operational Risk Stress Loss Model has been reviewed by Citi's Model Risk Management team and is specifically validated for use in UAE. Operational Risk Management review the material operational risks facing the business as well as the full database of operational risk losses sustained by the entity. A quantitative tool, developed by the global Operational Risk Analytics team for use in ICAAPs, was used in providing estimates of potential stress losses in relation to Operational Risk.

This tool relies on loss data reported into Loss Capture System, uses separate frequency and severity components and is run a sufficient number of iterations to provide loss estimates across a range of probabilities, in this case 1-in-50, 1-in-25, 1-in-10 and compares this output to a variety of benchmarks (e.g. Worst 3 year period / Worst 3 year period excluding Largest event / Largest event / Average loss per 3 year period / Most recent loss 3 year period / Worst 3 year period) for consideration. The model output is distributed 40% of the loss falls in year 1, and 30% in each of years 2 & 3. The rationale for a 40%-30%-30% distribution is based on historical loss data which highlights an improving trend for following quarters / year whenever the bank had experienced a severe loss event. Also, following any severe loss event, preventative measures are put in place and lessons learned are implemented by management to prevent a reoccurrence.

Citibank UAE has adopted group issued Operational Risk Management (ORM Policy) which is designed to maintain a sound and well-controlled operational environment. Policy that codifies the principles, the minimum requirements, and prescriptions of the "how-to" for operational risk management that Businesses and Functions must comply with. The ORM Policy consists of Standards and Central Procedures, following the construct prescribed by the Citi Policy Governance Policy. ORM Unit through credible challenge works with the businesses and other control functions to develop & maintain a strong operational risk management culture and framework and engages with the businesses to ensure effective implementation of the ORM framework by focusing on:

- Identification, analysis, and assessment of operational risks,
- Effective challenge of key control issues and operational risks and
- Anticipation and mitigation of operational risk events.

To anticipate, mitigate and control operational risk; Citibank UAE has adopted the Governance, Risk and Compliance (GRC) & comprehensive self-assessment program, methodology and tools - "Manager's Control Assessment" which support managers in mitigating their GRC risks through consistent (i) risk and control identification; (ii) risk and control assessment and monitoring; (iii) residual risk management.

Operational Risk is managed through local and regional in-business risk and compliance & control resources supported by a centralized team of Operational Risk specialists. Localized governance is achieved through Citibank N.A. UAE, Business Risk and Controls Committee ("BRCC") subject also to EMEA regional oversight from the EMEA Risk Committee, EMEA Operational Risk Forum, and Regional Heads of Business Sectors and Functions.

UAE Business Risk and Controls Committee ("BRCC")

The Business Risk and Controls Committee (BRCC) is a key risk and control committee, and it plays an essential governance role in identifying, measuring, monitoring, reporting and managing of Governance Risk & Compliance (GRC) risks. The BRCC brings together the three lines of defense with a common goal: ensuring that a strong risk and control framework and a culture of risk awareness are maintained across the franchise.

The EMEA Regional BRCC

The committee receives and reviews a quarterly risk report that includes a report on EMEA Operational Risk and provides MCA results, key operational risk exposures and internal and external loss experiences.

The EMEA Operational Risk Forum

The Committee is the regional forum for the exchange of information and views on all operational risk matters and the raising of operational risk issues of a more strategic nature. The Committee covers all business activities of Citi within the region and all such activities undertaken on legal vehicles resident within the region. The Committee provides a catalyst for the consistent implementation of an operational risk framework within the region and across all Citi legal vehicles operating within the region, country or legal vehicle. The membership of the Committee consists of Operational Risk representatives from each of the Regional Business Sectors and Functions.

Independent assessment and evaluation of the Sectors' and Functions' compliance with Operational Risk policy, including assessing the adequacy and effectiveness of the risk management and control processes is provided by Internal Audit. In addition, the Internal Audit reports the results of its assessments to the appropriate levels of in country and regional senior management.

4.3 Template OV1: Overview of RWA (Quarterly)

		a	b	c
		RWA		Minimum capital requirements
		T	T-1	T
1	Credit risk (excluding counterparty credit risk)	13,213,376	14,238,340	-
2	Of which: standardised approach (SA)	13,213,376	14,238,340	-
3	[redacted]			
4				
5				
6	Counterparty credit risk (CCR)	1,478,150	0	-
7	Of which: standardised approach for counterparty credit risk	1,478,150	0	-
8	[redacted]			
9				
10				
11				
12	Equity investments in funds - look-through approach	0	0	0
13	Equity investments in funds - mandate-based approach	0	0	0
14	Equity investments in funds - fall-back approach	0	0	0
15	Settlement risk	0	0	0
16	Securitisation exposures in the banking book	0	0	0
17	[redacted]			
18	Of which: securitisation external ratings-based approach (SEC-ERBA)	0	0	0
19	Of which: securitisation standardised approach (SEC-SA)	0	0	0
20	Market risk	351,755	140,952	36,934
21	Of which: standardised approach (SA)	351,755	140,952	36,934
22	[redacted]			
23	Operational risk	3,478,268.31	3,478,268.31	365,218.17
24	[redacted]			
25				
26	**Total (1+6+10+11+12+13+14+15+16+20+23)**	**18,521,550**	**17,857,560**	**402,152**

5. Linkages Between Financial Statements and Regulatory Exposures

5.1 Template LI1: Differences between accounting and regulatory scopes of consolidation and mapping of financial statement categories with regulatory risk categories (Annual)

	a	b	c	d	e	f	g
	Carrying values as reported in published financial statements	Carrying values under scope of regulatory consolidation	Carrying values of items:				
			Subject to credit risk framework	Subject to counterparty credit risk framework	Subject to the securitisation framework	Subject to market risk framework	Not subject to capital requirements or subject to deduction from capital
Assets							
CASH & BALANCES WITH CENTRAL BANK	12,420,508	12,420,508	12,420,508	-	-	-	-
DUE FROM HEAD OFFICE /OWN BRANCHES/ BANKING SUBS. (GROSS)	619,223	619,223	619,223	-	-	-	-
BALANCES DUE FROM OTHER BANKS (GROSS)	3,101,192	3,101,192	3,101,192	-	-	-	-
INVESTMENTS AND FINANCIAL ASSETS	12,451,457	12,451,457	12,451,457	-	-	6,752,436	-
LOANS & ADVANCES (GROSS)	8,279,954	8,279,954	8,279,954	-	-	-	-
NET FIXED ASSETS	125,138	125,138	125,138	-	-	-	-
OTHER ASSETS	705,457	705,457	705,457	-	-	-	-
CUSTOMER ACCEPTANCES	402,295	402,295	402,295	-	-	-	-
POSITIVE FAIR VALUE OF DERIVATIVES	75,920	75,920	75,920	-	-	-	-
Total Assets	38,181,144	38,181,144	38,181,144	-	-	6,752,436	-
Liabilities							
DUE TO BANKS	188,014	188,014	-	-	-	-	-
CUSTOMER DEPOSITS	30,148,380	30,148,380	-	-	-	-	-
DUE TO HEAD OFFICE AND BRANCHES ABROAD	3,466,233	3,466,233	-	-	-	-	-
PROVISIONS & INTEREST IN SUSPENSE*	-	-	-	-	-	-	-
OTHER LIABILITIES	1,047,716	1,047,716	-	-	-	-	-
CUSTOMER ACCEPTANCES	402,295	402,295	-	-	-	-	-
NEGATIVE FAIR VALUE OF DERIVATIVES	220,933	220,933	-	-	-	-	-
Total Liabilities	35,473,571	35,473,571	-	-	-	-	-
Equity							
ALLOCATED CAPITAL	135,901	135,901	-	-	-	-	-
LEGAL RESERVE	67,951	67,951	-	-	-	-	-
FAIR VALUE RESERVE	(36,744)	(36,744)	-	-	-	-	-
OTHER RESERVES	(6,179)	(6,179)	-	-	-	-	-
RETAINED EARNINGS	2,546,644	2,546,644	-	-	-	-	-
Total shareholders' equity	2,707,573	2,707,573	-	-	-	-	-

5.2 Template LI2: Main sources of differences between regulatory exposure amounts and carrying values in financial statements (Annual)

		a	b	c	d	e
			Items subject to:			
		Total	Credit risk framework	Securitisation framework	Counterparty credit risk framework	Market risk framework
1	**Asset carrying value amount under scope of regulatory consolidation (as per template LI1)**	38,181,144	38,181,144	-	-	6,752,436
5	*Differences in valuations and other*	118,397	118,397	-	-	-
7	*Differences due to consideration of provisions*	592,858	592,858	-	-	-
9	**Exposure amounts considered for regulatory purposes**	38,655,605	38,655,605	-	-	6,752,436

5.3 Template LIA: Explanations of differences between accounting and regulatory exposure amounts (Annual)

This section is not applicable for CBNA UAE since the Bank is not preparing consolidated financial statement, therefore no difference identified.

6. Prudential Valuation Adjustments

6.1 Template PV1: Prudent valuation adjustments (Annual)

Citi UAE assessed and determined that PVA is not applicable due to the instruments traded and the global pricing models used for the vanilla products traded as of 31 December 2021.

Citi UAE does not hold model/valuation reserve for the global valuation models used for pricing the derivatives. Citi UAE trades vanilla foreign exchange and interest instruments and there is no reduced liquidity uncertainty for these instruments or complex products traded where valuation adjustments would be deemed necessary.

PVA's are only applied to Citi entities that are under the European Banking Authority (EBA) based on the specific EBA PVA Regulatory Standards.

7. Composition of Capital

Citi UAE capital management framework is designed to ensure that adequate capital consistent with its risk profile, management targets and all applicable regulatory standards and guidelines are maintained. There were no significant changes to Citi UAE regulatory capital over the reporting period.

The following tables present the semi-annual components of Citi UAE composition of regulatory capital and reconciliation of regulatory capital to balance sheet as of 31 December 2021.

7.1Template CC1: Composition of regulatory capital (Semi-annual)

		a	b
		Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
	Common Equity Tier 1 capital: instruments and reserves		
1	Directly issued qualifying common share (and equivalent for non-joint stock companies) capital plus related stock surplus	135,901	Same as (h) from CC2 template
2	Retained earnings	2,185,994	
3	Accumulated other comprehensive income (and other reserves)	25,453	
4	*Directly issued capital subject to phase-out from CET1 (only applicable to non-joint stock companies)*	NA	
5	Common share capital issued by third parties (amount allowed in group CET1)	NA	
6	**Common Equity Tier 1 capital before regulatory deductions**	**2,347,348**	
	Common Equity Tier 1 capital regulatory adjustments		
7	Prudent valuation adjustments	0	
8	Goodwill (net of related tax liability)	0	CC2 (a) minus (d)
9	Other intangibles including mortgage servicing rights (net of related tax liability)	0	CC2 (b) minus (e)
10	Deferred tax assets that rely on future profitability, excluding those arising from temporary differences (net of related tax liability)	0	
11	Cash flow hedge reserve	0	
12	Securitisation gain on sale	0	
13	Gains and losses due to changes in own credit risk on fair valued liabilities	0	
14	Defined benefit pension fund net assets	0	
15	sheet)	0	
16	Reciprocal cross-holdings in CET1, AT1, Tier 2	0	
17	Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation, where the bank does not own more than 10% of the issued share capital (amount above 10% threshold)	0	
18	Significant investments in the common stock of banking, financial and insurance entities that are outside the scope of regulatory consolidation (amount above 10% threshold)	0	
19	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability)	0	
20	Amount exceeding 15% threshold	0	
21	Of which: significant investments in the common stock of financials	0	
22	Of which: deferred tax assets arising from temporary differences	0	
23	CBUAE specific regulatory adjustments	0	
24	**Total regulatory adjustments to Common Equity Tier 1**	0	
25	**Common Equity Tier 1 capital (CET1)**	**2,347,348**	
	Additional Tier 1 capital: instruments		
26	Directly issued qualifying Additional Tier 1 instruments plus related stock surplus	0	CC2 (i)
27	OF which: classified as equity under applicable accounting standards	0	
28	Of which: classified as liabilities under applicable accounting standards	0	
29	*Directly issued capital instruments subject to phase-out from additional Tier 1*	0	
30	Additional Tier 1 instruments (and CET1 instruments not included in row 5) issued by subsidiaries and held by third parties (amount allowed in AT1)	0	
31	*Of which: instruments issued by subsidiaries subject to phase-out*	0	
32	Additional Tier 1 capital before regulatory adjustments	0	
	Additional Tier 1 capital: regulatory adjustments		
33	Investments in own additional Tier 1 instruments	0	
34	Investments in capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation	0	
35	Significant investments in the common stock of banking, financial and insurance entities that are outside the scope of regulatory consolidation	0	
36	CBUAE specific regulatory adjustments	0	
37	Total regulatory adjustments to additional Tier 1 capital	0	
38	**Additional Tier 1 capital (AT1)**	**0**	
39	**Tier 1 capital (T1= CET1 + AT1)**	**2,347,348**	
	Tier 2 capital: instruments and provisions		
40	Directly issued qualifying Tier 2 instruments plus related stock surplus		
41	*Directly issued capital instruments subject to phase-out from Tier 2*		
42	Tier 2 instruments (and CET1 and AT1 instruments not included in rows 5 or 30) issued by subsidiaries and held by third parties (amount allowed in group Tier 2)		
43	*Of which: instruments issued by subsidiaries subject to phase-out*		
44	Provisions	183,644	
45	**Tier 2 capital before regulatory adjustments**	**183,644**	
	Tier 2 capital: regulatory adjustments		
46	Investments in own Tier 2 instruments	0	
47	Investments in capital, financial and insurance entities that are outside the scope of regulatory consolidation, where the bank does not own more than 10% of the issued common share capital of the entity (amount above 10% threshold)	0	
48	Significant investments in the capital, financial and insurance entities that are outside the scope of regulatory consolidation (net of eligible short positions)	0	
49	CBUAE specific regulatory adjustments	0	
50	**Total regulatory adjustments to Tier 2 capital**	**0**	
51	**Tier 2 capital (T2)**	**183,644**	
52	**Total regulatory capital (TC = T1 + T2)**	**2,530,992**	
53	**Total risk-weighted assets**	**18,521,550**	
	Capital ratios and buffers		
54	**Common Equity Tier 1 (as a percentage of risk-weighted assets)**	**12.67%**	
55	**Tier 1 (as a percentage of risk-weighted assets)**	**12.67%**	
56	**Total capital (as a percentage of risk-weighted assets)**	**13.67%**	
57	**Institution specific buffer requirement (capital conservation buffer plus countercyclical buffer requirements plus higher loss absorbency requirement, expressed as a percentage of risk-weighted assets)**	**2.50%**	
58	**Of which: capital conservation buffer requirement**	**2.50%**	
59	**Of which: bank-specific countercyclical buffer requirement**	**0.00%**	
60	**Of which: higher loss absorbency requirement (e.g. DSIB)**	**0.00%**	
61	**Common Equity Tier 1 (as a percentage of risk-weighted assets) available after meeting the bank's minimum capital requirement.**	**3.17%**	
	The CBUAE Minimum Capital Requirement		
62	Common Equity Tier 1 minimum ratio	**7.00%**	
63	Tier 1 minimum ratio	**8.50%**	
64	Total capital minimum ratio	**10.50%**	
	Amounts below the thresholds for deduction (before risk weighting)		
[redacted]			
66	Significant investments in common stock of financial entities	0	
[redacted]			
68	Deferred tax assets arising from temporary differences (net of related tax liability)	196,782	
	Applicable caps on the inclusion of provisions in Tier 2		
69	Provisions eligible for inclusion in Tier 2 in respect of exposures subject to standardised approach (prior to application of cap)	183,644	
70	Cap on inclusion of provisions in Tier 2 under standardised approach		
[redacted]			
	Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2018 and 1 Jan 2022)		
73	*Current cap on CET1 instruments subject to phase-out arrangements*	NA	
74	*Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)*	NA	
75	*Current cap on AT1 instruments subject to phase-out arrangements*	NA	
76	*Amount excluded from AT1 due to cap (excess after redemptions and maturities)*	NA	
77	*Current cap on T2 instruments subject to phase-out arrangements*	NA	
78	*Amount excluded from T2 due to cap (excess after redemptions and maturities)*	NA	

7.2 Template CC2: Reconciliation of regulatory capital to balance sheet (Semi-annual)

	a	b	c
	Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference
	As at period-end	As at period-end	
Assets			
CASH & BALANCES WITH CENTRAL BANK	12,420,508	12,420,508	
DUE FROM HEAD OFFICE /OWN BRANCHES/ BANKING SUBS. (GROSS)	619,223	619,223	
BALANCES DUE FROM OTHER BANKS (GROSS)	3,101,192	3,101,810	
INVESTMENTS AND FINANCIAL ASSETS	12,451,457	12,451,457	
LOANS & ADVANCES (GROSS)	8,279,954	8,872,196	
NET FIXED ASSETS	125,138	125,138	
OTHER ASSETS	705,457	1,391,650	
CUSTOMER ACCEPTANCES	402,295		
POSITIVE FAIR VALUE OF DERIVATIVES	75,920	75,918	
TOTAL ASSETS	38,181,144	39,057,900	
Liabilities			
DUE TO BANKS	188,014	188,014	
CUSTOMER DEPOSITS	30,148,380	30,148,382	
DUE TO HEAD OFFICE AND BRANCHES ABROAD	3,466,233	3,466,233	
PROVISIONS & INTEREST IN SUSPENSE*	-	592,858	
OTHER LIABILITIES	1,047,716	1,300,833	
CUSTOMER ACCEPTANCES	402,295	402,295	
NEGATIVE FAIR VALUE OF DERIVATIVES	220,933	220,933	
TOTAL LIABILITIES	35,473,571	36,319,548	
Shareholders' equity			
ALLOCATED CAPITAL	135,901	135,901	
LEGAL RESERVE	67,951	67,951	
FAIR VALUE RESERVE	(36,744)	(36,744)	
OTHER RESERVES	(6,179)	(5,754)	
RETAINED EARNINGS	2,546,644	2,576,998	
Total shareholders' equity	2,707,573	2,738,352	

7.3 Template CCA: Main features of regulatory capital instruments (Semi-annual)

Not applicable for CBNA UAE, since the bank does not have any instruments in scope.

8. Macroprudential Supervisory Measures

8.1 Template CCyB1: Geographical distribution of credit exposures used in the countercyclical buffer (Semi-annual)

Not applicable for CBNA UAE, since the bank does not have anything in scope.

9. Leverage Ratio

The Basel III leverage ratio is a non-risk sensitive ratio used to restrict the build-up of leverage in the banking sector to avoid destabilizing deleveraging processes that can damage the broader financial system and the economy. It compares the Tier 1 capital to the total exposure (including off balance sheet items) on a non-risk weighted basis.

Citi UAE Basel III leverage ratio calculated in accordance with the Central Bank of UAE regulations, was 5.07% on 31 December 2021, above the regulatory minimum requirement of 3%.

Citi UAE leverage position is managed within the Citigroup Global Risk Appetite framework. The leverage ratio is also calculated and presented to the ALCO every month.

The following tables present Citi UAE summary comparison of accounting assets versus leverage ratio exposure amount and leverate ratio common disclosure as of quarter ended 31 December 2021.

9.1 Template LR1: Summary comparison of accounting assets vs leverage ratio exposure measure (January 2014 standard) (Quarterly)

		a
1	Total consolidated assets as per published financial statements	38,181,144
2	Adjustments for investments in banking, financial, insurance or commercial entities that are consolidated for accounting purposes but outside the scope of regulatory consolidation	
3	Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference	
4	Adjustments for temporary exemption of central bank reserves (if applicable)	
5	Adjustment for fiduciary assets recognised on the balance sheet pursuant to the operative accounting framework but excluded from the leverage ratio exposure measure	
6	Adjustments for regular-way purchases and sales of financial assets subject to trade date accounting	
7	Adjustments for eligible cash pooling transactions	
8	Adjustments for derivative financial instruments	3,109,126
9	Adjustment for securities financing transactions (ie repos and similar secured lending)	
10	Adjustments for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	4,551,323
11	Adjustments for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital	592,858
12	Other adjustments	(118,397)
13	**Leverage ratio exposure measure**	46,316,054

9.2 Leverage ratio common disclosure template (January 2014 standard) (Quarterly)

		a	b
		T	T-1
On-balance sheet exposures			
1	On-balance sheet exposures (excluding derivatives and securities financing transactions (SFTs), but including collateral)	38,655,605	
2	Gross-up for derivatives collateral provided where deducted from balance sheet assets pursuant to the operative accounting framework	-	
3	(Deductions of receivable assets for cash variation margin provided in derivatives transactions)	-	
4	(Adjustment for securities received under securities financing transactions that are recognised as an asset)	-	
5	(Specific and general provisions associated with on-balance sheet exposures that are deducted from Tier 1 capital)	-	
6	(Asset amounts deducted in determining Tier 1 capital)	-	
7	**Total on-balance sheet exposures (excluding derivatives and SFTs) (sum of rows 1 to 6)**	38,655,605	
Derivative exposures			
8	Replacement cost associated with *all* derivatives transactions (where applicable net of eligible cash variation margin and/or with bilateral netting)	1,681,396	
9	Add-on amounts for PFE associated with *all* derivatives transactions	539,408	
10	(Exempted CCP leg of client-cleared trade exposures)	0	
11	Adjusted effective notional amount of written credit derivatives	0	
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	0	
13	**Total derivative exposures (sum of rows 8 to 12)**	3,109,126	
Securities financing transactions			
14	Gross SFT *assets* (with no recognition of netting), after adjusting for sale accounting transactions	0	
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	0	
16	CCR exposure for SFT assets	0	
17	Agent transaction exposures	0	
18	**Total securities financing transaction exposures (sum of rows 14 to 17)**	0	
Other off-balance sheet exposures			
19	Off-balance sheet exposure at gross notional amount	13,625,168	
20	(Adjustments for conversion to credit equivalent amounts)	(9,073,845)	
21	(Specific and general provisions associated with off-balance sheet exposures deducted in determining Tier 1 capital)		
22	**Off-balance sheet items (sum of rows 19 to 21)**	4,551,323	
Capital and total exposures			
23	**Tier 1 capital**	2,347,348	
24	**Total exposures (sum of rows 7, 13, 18 and 22)**	46,316,054	
Leverage ratio			
25	**Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves)**	5.07%	
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves)	NA	
26	CBUAE minimum leverage ratio requirement	3.00%	
27	**Applicable leverage buffers**		

10. Liquidity

10.1 Template LIQA: Liquidity risk management (Annual)

Liquidity is the ability of an institution to fund increases in assets and meet obligations as they fall due at a reasonable cost. Liquidity risk is the risk that the institution will not be able to efficiently meet both expected and unexpected current and future cash flow and collateral needs without adversely affecting either daily operations or the financial condition of Citi UAE.

The liquidity position of Citi UAE is managed as a part of the Liquidity Risk Management Policy ("LRM Policy"). The LRM Policy establishes the framework for defining, measuring, limiting and reporting liquidity risk to ensure the transparency and comparability of liquidity risk-taking activities. It also provides for the establishment of an appropriate risk appetite and liquidity risk management strategies. The bank's liquidity position is closely monitored by senior management through daily reporting of key liquidity metrics and more formally through the monthly Asset Liability Committee ("ALCO") which is responsible for endorsing the entity's annual funding and liquidity plans (FLP) and associated liquidity limits and ratios.

The following are part of the LRM Policy:

- Liquidity Risk Management Framework
- Liquidity Monitoring and Escalation
- Liquidity Stress Continuum
- Annual Balance Sheet Funding and Liquidity Plan (FLP) which addresses strategic liquidity issues and establish the parameters for identifying, measuring, monitoring and limiting liquidity risk
- Contingency Funding Plan detailing the "playbook" for addressing liquidity and funding challenges and solutions in crisis situation
- Intraday Liquidity Management Plan
- Cash Flow Projections
- Funding & Liquidity Assessment of New Products
- Internal Metrics and Stress Test Assumption Changes
- Cash flow forecast back-testing
- HQLA monetisation plan
- Intraday Monitoring, management & Reserving Procedures

To measure Liquidity Risk, Citi UAE performs simulated liquidity scenario (long term and short term) stress testing. The scenario includes assumptions about significant changes in key funding parameters. The results of scenario tests are reviewed to ensure that Citi UAE has sufficient liquidity, including in stressed scenarios. This scenario assumes market, credit and economic conditions are moderately to highly stressed with potential further deterioration, and is used to measure a 12-month and 30-day survival horizon. From a Liquidity Risk mitigation perspective, assets and liabilities are managed to ensure that there is adequate liquidity to independently meet all obligations as and when they fall due and to remain self-funding even in stress scenarios across all maturity buckets. The results of these stress tests are monitored daily against pre-set and approved limits and triggers. Furthermore, liquidty is also monitored against balance sheet metrics and its respective triggers. This includes ratios such as Deposit to Loan and Concentration on third party deposits.

As a regulated entity the bank's liquidity is also managed against the Central Bank of UAE's regulatory requirements for the management of liquidity risk and associated monitoring ratios such as Advances to stable resources ratio ("ASRR") and Eligible Liquid Assets Ratio("ELAR"). Results of these are under the quantitative section.

From a liquidity risk mitigation perspective, assets and liabilities are managed to ensure that there is adequate liquidity to meet all obligations as and when they fall due and to remain self-funding even in stress scenarios. In addition, Citi UAE branch ensures a well-diversified and stable funding base, across geographies, which benefits from Citi's global franchise. Citi UAE branch has significant access to funding at parent level. A further risk mitigant is that stable funding and deposits bases in both local currency and foreign currency with surplus cash invested in liquid assets.

Citi UAE's funding and liquidity framework ensures that the tenor of funding sources is of sufficient term in relation to the tenor of its asset base. The goal of Citi UAE's asset/liability management is to ensure that there is excess liquidity and tenor in the liability structure relative to the liquidity profile of the assets. This reduces the risk that liabilities will become due before assets mature or are monetized.

Roles & Responsibilities:

It is the responsibility of the Independent Treasury Risk Manager and, where applicable the ALCO, to ensure that all Risk-Taking Units are identified and adhere to the Policy. Oversight for managing Liquidity Risk is the responsibility of the Independent Treasury Risk Manager, with ALCO as the primary governance committee for the balance sheet.

Treasury – First Line of Defence responsibilities summary:

- Own the authority and responsibility for managing liquidity risk and the balance sheet and prepare the annual forecasted balance sheet (FLP) in accordance with the liquidity forecasting process, including forecasts of liquidity metrics
- Prepare the Contingency Funding Plan (CFP) and responsible for declaring local contingency, invoking the CFP, and executing the plan
- Monitor liquidity risk stress test metrics, liquidity ratios, concentration metrics, Liquidity Market Triggers (LMTs), short-term cash-flow projections and intraday liquidity positions against established limits, triggers, and thresholds
- Notify all the relevant stakeholders in the event of Limit, Trigger, or threshold breaches, including an explanation of the root cause and remediation plan

Treasury Risk Management (TRM) – Second Line of Defence responsibilities summary:

- Provide second line of defense oversight of liquidity risk management processes performed through monitoring and escalation of liquidity risks and liquidity risk management practices

- Review and challenge the forecasted balance sheet. Approve the forecasts of liquidity metrics to ensure risks associated with planned funding or other treasury actions are identified and Limits/Triggers are set at an appropriate level;
- Document and notify the Regional Treasury Risk Manager and other relevant stakeholders of any limit and trigger approvals and changes. Escalate limit and trigger breaches and confirm accuracy of the breaches and their remediation plan with Treasury
- Monitor and thoroughly review the calculation of liquidity risk stress test metrics, liquidity ratios, concentration metrics, Liquidity Market Triggers (LMTs), short-term cash-flow projections, and intraday liquidity positions and against the established thresholds.

10.2 Template LIQ1: Liquidity Coverage Ratio (Quarterly)

Not applicable for CBNA UAE as per CBUAE guidance this is applicable to specific banks.

10.3 Template LIQ2: Net Stable Funding Ratio (Semi-annual)

Not applicable for CBNA UAE as per CBUAE guidance this is applicable to specific banks.

10.4 Template ELAR: Eligible Liquid Assets Ratio (Quarterly)

1	High Quality Liquid Assets	Nominal amount	Eligible Liquid Asset
1.1	Physical cash in hand at the bank + balances with the CBUAE	12,420,508	
1.2	UAE Federal Government Bonds and Sukuks	0	
	Sub Total (1.1 to 1.2)	12,420,508	12,420,508
1.3	UAE local governments publicly traded debt securities	282,157	
1.4	UAE Public sector publicly traded debt securities	0	
	Sub total (1.3 to 1.4)	282,157	282,157
1.5	Foreign Sovereign debt instruments or instruments issued by their respective central banks	12,169,300	2,866,271
1.6	**Total**	**24,871,965**	**15,568,936**
2	Total liabilities		35,726,690
3	**Eligible Liquid Assets Ratio (ELAR)**		**0.44**

10.5 Template ASRR: Advances to Stable Resources Ratio (Quarterly)

		Items	Amount
1		**Computation of Advances**	
	1.1	Net Lending (gross loans - specific and collective provisions + interest in suspense)	8,576,251
	1.2	Lending to non-banking financial institutions	-
	1.3	Net Financial Guarantees & Stand-by LC (issued - received)	962,856
	1.4	Interbank Placements	1,141,134
	1.5	**Total Advances**	10,680,241
2		**Calculation of Net Stable Ressources**	
	2.1	Total capital + general provisions	3,035,265
		Deduct:	
	2.1.1	Goodwill and other intangible assets	-
	2.1.2	Fixed Assets	125,138
	2.1.3	Funds allocated to branches abroad	-
	2.1.5	Unquoted Investments	-
	2.1.6	Investment in subsidiaries, associates and affiliates	-
	2.1.7	**Total deduction**	125,138
	2.2	**Net Free Capital Funds**	2,910,127
	2.3	**Other stable resources:**	
	2.3.1	Funds from the head office	-
	2.3.2	Interbank deposits with remaining life of more than 6 months	2
	2.3.3	Refinancing of Housing Loans	-
	2.3.4	Borrowing from non-Banking Financial Institutions	-
	2.3.5	Customer Deposits	25,643,461
	2.3.6	Capital market funding/ term borrowings maturing after 6 months from reporting date	-
	2.3.7	**Total other stable resources**	25,643,463
	2.4	**Total Stable Resources (2.2+2.3.7)**	28,553,590
3		**Advances TO STABLE RESOURCES RATIO (1.6/ 2.4*100)**	37.40

11. Credit Risk

11.1 Template CRA: General qualitative information about credit risk (Annual)

The bank's business is segregated into different business models (Consumer, Commercial, Corporates/Bank and Markets) and each business has their own risk management team that covers those business models. The business teams sit in the first line of defence, the second linee of defence includes risk managment, compliance and legal while the third line is only audit.

Citi maintains product-level risk strategies which clearly articulate and identify the key risks that arise from business strategy and activities, discuss boundaries around all key risks, including behaviour expectations for qualitative risks, and metrics, limits or thresholds for monitoring and managing quantitative risks, and ensuring the right policies, governance and control processes, and risk limits are in place, and operate effectively, to manage those risks. Business defines the credit risk appetite statement to articulate the space in which we want to acquire accounts or additional exposure supported by guardrails, triggers and Key Performance Indicators defining the targeted portfolio risk and returns.

Citi's approach for defining credit policies and setting limits is centralized. Whole sale businesses follow wholesale policies, consumer businesses follow consumer policies etc.. Based on Citi ICG policy of extension of Credit (depending on Rating, Classification, Risk appetite, sector/industry etc..). Similar for CCB, based on Commercial extension of Credit policy. All policies are reviewed against local regulations to ensure the bank is operating within regulaotry guidelines and expectations.

Credit risk management policy and credit risk limits are established to optimize profitability within the firm’s risk appetite. Guardrails, triggers and limits are established in line with the profitability benchmarks for material segment in credit cycle - returns, delinquency and loss expectations that link to a desired economic performance, and monitored through dashboard/ KPIs and discussed in the review forums for decision making if change is required. The benchmarks, guardrails, triggers and limits are reviewed on a regular basis.

The credit risk function reports into the CRO. Credit Risk is divided into 3 divisions namely, Institutional, Commercial and Consumer. Eachdivision has its own teams.

Consumer credit risk management is structured to cover full credit cycle based on a strong analytical framework and advance risk infrastructure supported by local and global system solutions. Multi-layered control frameworks are in place in credit risk management including management control assessment and quality assurance framework through a continued focus on leveraging/ digital monitoring to ensure compliance to global and local regulations. Periodic governance forums and protocols that facilitate managing the key risks and escalation of issues to ensure strong risk controls and cultures across business functions which are closely integrated in business strategy decisions. Quality assurance framework provides a common, dynamic end-to-end risk control framework, which validates that high risk elements across each phase of the credit cycle are executed in a consistent and timely manner, and ensuring a proactive, continuous monitoring process is in place for self-identification of issues, leading to faster resolution.

As per Citi policy and procedure, Citi bank teams are segragated between 3 lines of defence (1st, 2nd and 3rd) accordingly the roles and responsiblities and interaction are well structured between credit risk, controls and compliance. Internal audit is our 3rd line of defense which is a strong control process we have. From a relationship stand point, we have regular interactions amongst teams via country commitees and forum or audit reviews or any deal discussions as required.

Citi uses a lines of defence model to manage its overall risk including consumer credit risk. The model brings together risk taking, risk oversight and risk assurance, and is comprised of units that create risk in the first line of defence (Business Leadership and Business Risk Management functions), those that independently assess risk as the second line of defence Independent Risk Management and Global Risk Review functions and those that provide independent assurance as the third line of defence, that is Internal Audit and fundamental credit review (FCR). In-business credit risk management as a first line of defense, is responsible for the credit risk of respective portfolios and must assure its proper approval and execution in compliance with the established local and global policies and procedures. Independent risk oversights business credit risk management, and Internal Audit responsibilities are carried out independently under the oversight of the Audit Committees. Additionally, the firm has Enterprise Support units tasked with maintaining a strong support environment across all Lines of Defence.

Reporting is done through the governance forums to executive management. The scope and content of this reporting is to highlight the key parameters of our portfolio/rating/classification mix any impaired assets/tenor.

Ongoing monitoring and regular (monthly/ quarterly) review of product/ segment level key performance indicators with Business leaderships and Independent Risk through multiple forums including Risk committees and portfolio quality reviews. Any breaches in guardrails or triggers are escalated to relevant forums for formal review and decision making for actions required.

11.2 Template CR1: Credit quality of assets (Semi-annual)

		a	b	c	d	e	f
		Gross carrying values of		Allowances/Impairments	Of which ECL accounting provisions for credit losses		Net values (a+b-c)
		Defaulted exposures	Non-defaulted exposures		Allocated in regulatory category of Specific	Allocated in regulatory category of General	
1	Loans	298,841	8,329,901	573,750	276,836	296,914	8,054,992
2	Debt securities	-	5,699,021	-	-	-	5,699,021
3	Off-balance sheet exposures	235	13,625,168	7,878	2,094	5,784	13,617,525
4	**Total**	**299,076**	**27,654,090**	**581,628**	**278,930**	**302,698**	**27,371,538**

11.3 Template CR2: Changes in the stock of defaulted loans and debt securities (Semi-annual)

		a	Bank's comment
1	**Defaulted loans and debt securities at the end of the previous reporting period**	68,194,201	Balance of defaulted accounts as of June2021
2	Loans and debt securities that have defaulted since the last reporting period	49,534,706	Balance of defaulted accounts as of Dec2021, exclusion-(Accts which was default in June2021)
3	Returned to non-default status	4,750,777	Balance of defaulted accounts as of June2021, which became non-defaulted as of Dec2021
4	Amounts written off	62,118,801	Balance of defaulted accounts as of June2021 which got wrtten off during the period from Jul2021 till Dec2021
5	Other changes	223,759	Reduction in balance of Accounts still under default status in June2021 and Dec2021.
6	**Defaulted loans and debt securities at the end of the reporting period (1+2-3-4±5)**	50,635,569	Dec21 defaults (item 6) is significantly lower than 2Q'21 defaults (item 1) by 26% due to improved delinquent inventories for cards and loans post COVID impact clean-up.
			* Defaulted accounts are accounts in 90+ days past due excluding writeoff

11.4 Template CRB: Additional disclosure related to credit quality of assets (Annual)

The definition of past due exposure is a facility where the customer has not paid according to his agreed terms by the payment due date. This means, if a customer has a payment due date as of the first day of a month and fails to make a payment, then the exposure is considered as past due. The impaired exposures are any exposure where the customer is past due by 90 days or more.

All exposures which are >90 days are considered as credit impaired.

Citibank follows IFRS9 compliant approach for ECL reserve requirement. Stagewise balances is considered using the Staging rules and cool off period in line with CB UAE guidelines. For General provisions (Stage 1 and 2), PD is calculated as forward looking 12 months ECL for stage 1, while for stage Stage2 Citi is considering 100% balances less 12 month forward looking recoveries. For specific Provisions (stage 3), ECL is considered as 100% of balances less 12 month forward looking recoveries.

For consumer portfolios, restructuring is anything where there is a change in the original terms and conditions of the contract, like payment term, tenor or restructuring the entire due after forgiving full or part of the interest due of the customer into Equated Monthly Instalments. This is not applicable as consumer portfolio for UAE is to individual borrowers and not having any specific affinity to any industry.

All restructured exposures are considered impaired. As of 31-Dec-21, Citibank has AED 55.639MM worth of exposures in Consumer book (Cards and Loans) which are restructured.

The impaired assets as of 31-Dec-2021 is AED 237.15MM, with total provisions of AED 232.81MM. There were no write-offs during the year of 2021. All impaired assets are primarily within the Wholesale Trade industry in the UAE.

Ageing analysis of accounting past-due exposures:

DPD	Number of Accounts	Outstanding (AED)
0	178,381	5,156,051,614
1-29	1,864	46,569,222
30-59	1,320	27,755,707
60-89	980	22,285,295
90-119	757	19,631,715
120-149	475	15,876,291
150-179	389	15,127,564
Total	184,166	5,303,297,408

Breakdown of exposures by geographical areas, industry and residual maturity for individuals:

Geo & Sector (all individuals) & maturity				
Country	0 to 3 months	6 to 12 months	over 1 year	Total
Austria			3,044,727.27	3,044,727.27
Bahrain			3,425,486.45	3,425,486.45
Canada			6,066,998.37	6,066,998.37
Egypt			769,873.92	769,873.92
France			927,939.62	927,939.62
India			2,466,955.11	2,466,955.11
Japan	503,324,866.58			503,324,866.58
Kazakhstan			7,109,029.04	7,109,029.04
Lebanon			275,492.49	275,492.49
Qatar			13,552,612.47	13,552,612.47
Russian Federation			1,362,581.08	1,362,581.08
Singapore			2,500,134.92	2,500,134.92
Spain			2,318,822.62	2,318,822.62
Sweden			1,670,716.60	1,670,716.60
Thailand			12,578,708.62	12,578,708.62
Turkey			8,065,947.92	8,065,947.92
United Arab Emirates	25,392,548,053.11	1,770,663.24	2,739,798,870.10	28,134,117,586.45
United Kingdom	25.24		3,758,282.80	3,758,308.04
United States of America	14,740,622.79		1,217,224.25	15,957,847.04
Venezuela			552,451.66	552,451.66
Other			1,455,566.24	1,455,566.24
Total	25,910,613,567.72	1,770,663.24	2,812,918,421.55	28,725,302,652.51

Breakdown of exposures by geographical areas, industry and residual maturity for ICG:

Sector	0 to 3 months	3 to 6 months	6 to 12 months	over 1 year	Total
Central bank	7,122,065,251.83				7,122,065,251.83
Governments	12,442,586,073.42				12,442,586,073.42
GREs (Govt ownership more than 50%) (BRF 52-C)	13,178,453.18			300,158,799.56	313,337,252.74
Head Office	357,661,228.66				357,661,228.66
NBFI	(723,245.88)	4,885,162.95	76,790,591.84		80,952,508.91
Non-commercial entities (Emirates Govt)				134,432,220.00	134,432,220.00
Other banks	294,430,777.18	747,803,120.94	1,549,284,218.46	508,105,250.02	3,099,623,366.60
Other corporates	966,799,589.52	639,606,020.70	235,859,852.50	645,731,271.53	2,487,996,734.26
Private sector	123,115,372.20	120,339,100.59			243,454,472.79
Small & Medium Enterprises (SMEs)	172,367,583.01	18,208,397.91		114,748,995.08	305,324,976.00
Others	(2,080,450,358.07)	124,913,812.11	249,619,297.75	3,255,550.49	(1,702,661,697.72)
Total	19,411,030,725.07	1,655,755,615.20	2,111,553,960.55	1,706,432,086.68	24,884,772,387.50

	Sector											
Country	Central bank	Governments	GREs (Govt ownership more than 50%) (BRF 52-C)	Head Office	NBFI	Non-commercial entities (Emirates Govt)	Other banks	Other corporates	Private sector	Small & Medium Enterprises (SMEs)	Others	Total
Australia											1,489.79	1,489.79
Austria								37,748,109.16	2,056,226.39		113,994.22	39,918,329.77
Bahamas											2,580.40	2,580.40
Bahrain				56,082,985.46			606,576.46	660,026.63			2,168,818.15	59,518,406.70
Barbados											3,332.42	3,332.42
Belgium											299,871.20	299,871.20
Bermuda											3,549.34	3,549.34
Canada											7,111.31	7,111.31
Cayman Islands								164,063,475.55			329,856.29	164,393,331.84
China				8,500,833.91			90,489,403.72				15,558,120.56	114,548,358.18
Cyprus								13.44			30,260.90	30,274.34
Czech Republic											2,119.53	2,119.53
Denmark							9,800,558.96	155.95			3,805.26	9,804,520.17
Egypt				530,951.53			565,168.97	9,172.65			86,212.15	1,191,505.29
Finland											4,944.30	4,944.30
France				68,854.46			1,313,476.13				955,080.50	2,337,411.09
Germany											7,366.13	7,366.13
Guernsey								26,400,993.49	13,143,628.99		1,131,353.34	40,675,975.82
Hungary											591.80	591.80
India							12,639,105.21				14,043,686.31	26,682,791.52
Indonesia				133,380.98							8,876.94	142,257.92
Iraq								3,193,739.02			218,340.21	3,412,079.23
Ireland											30,833.37	30,833.37
Italy				35,647.61							9,057.79	44,705.40
Japan								3,075.00			2,944.21	6,019.21
Jordan				2,670,719.35			17,655,617.79	6,253,237.97			26,055,403.66	52,634,978.77
Kuwait				10,191,785.88			109,647,145.13	124,113.57			16,400,160.70	136,363,205.29
Lebanon								3,181.24			2,819,507.77	2,822,689.01
Liberia											42,864.74	42,864.74
Luxembourg											106,783.56	106,783.56
Malaysia				217,271.51							1,366.83	218,638.34
Marshall Islands											1,457.95	1,457.95
Netherlands								54,516.98			142,967.55	197,484.53
New Zealand				15,553.79				26,959.72			2,170.74	44,684.25
Nigeria				106,438.45							178,932.89	285,371.34
Norway							1,856,946.70				1,800.46	1,858,747.16
Oman							39,129,722.67	22,876,330.26			3,226,238.37	65,232,291.30
Panama								8,907,840.80			24,064.04	8,931,904.84
Philippines											62,841.67	62,841.67
Qatar				150,608.12			27,912,644.84	7,954,828.19			11,744,526.45	47,762,607.60
Saudi Arabia		51,608.70					62,213,719.00	143,878,589.78	1,235,074.94		151,752,484.00	359,131,476.42
Singapore								2,483.58			49,000.72	51,484.30
Spain							121,103.87	365.87			2,655.37	124,125.11
Switzerland								17,419,165.52			80,329,362.37	97,748,527.89
Taiwan, Province of China							8,319,001.45				1,526.33	8,320,527.78
Thailand				736,066.40				18,706.29			31,304.78	786,077.47
Turkey				33,856.52			13,230,583.10				125,459.58	13,389,899.20
United Arab Emirates	7,122,065,251.83	283,862,212.35	313,337,252.74		80,952,508.91	134,432,220.00	2,656,580,871.88	1,891,858,533.29	227,019,542.47	305,324,976.00	(2,218,772,610.27)	10,796,660,759.22
United Kingdom		(12,654,163.40)		242,685,413.63				84,790.39			61,644,665.05	291,760,705.67
Virgin Islands, British								15,872.20			50,516.48	66,388.68
United States of America		12,171,326,415.76		6,547,080.47			827,659.74	2,154,787.87			90,183,393.90	12,271,039,337.74
China (Hong Kong)				22,410,746.76			2,749,998.64	3,512.72			25,664.46	25,189,922.58
Libyan Arab Jamahiriya											340.89	340.89
Jersey								149,183.05			4,365.48	153,548.53
Republic of Korea											128,377.71	128,377.71
Argentina											0.18	0.18
Afghanistan								1,004.78			1,026.38	2,031.16
Morocco				5,383,370.83			1,499,080.05				17,059,942.72	23,942,393.61
Niger								(31,247.98)			71.33	(31,176.65)
Pakistan				13,611.91			17,441,745.05				1,738,642.13	19,193,999.09
Peru								151,224,717.28			294,484.58	151,519,201.86
Kazakhstan				3,109.33				2,936,500.00			1,423,575.04	4,363,184.37
Tunisia				170,997.18			843,552.51				139,969.08	1,154,518.77
Malta											(0.05)	(0.05)
Kenya				842,091.89			17,491,950.88				1,653,142.49	19,987,185.26
Sri Lanka											6,285,282.99	6,285,282.99
Uganda							437,908.51				1,563,440.47	2,001,348.97
Bangladesh							1,209,771.23				168,053.99	1,377,825.22
Ghana											1,761,938.20	1,761,938.20
Rwanda							1,111,475.32				94,069.11	1,205,544.43
Colombia											132,706.61	132,706.61
Ethiopia											658,272.17	658,272.17
Togo											15,785.62	15,785.62
Trinidad and Tobago											4,840.98	4,840.98
Tanzania, United Republic of				1,880.67							2,524,103.01	2,525,983.68
South Africa											681.30	681.30
Algeria							3,928,578.79				397,396.37	4,325,975.16
Palestine, State of											19,127.55	19,127.55
Mauritius											8,887.82	8,887.82
Venezuela											708.29	708.29
Cameroon				51,060.16								51,060.16
Ukraine				0.20								0.20
Greece				76,911.66								76,911.66
Russian Federation											210.00	210.00
Honduras											153.28	153.28
Total	7,122,065,251.83	12,442,586,073.42	313,337,252.74	357,661,228.66	80,952,508.91	134,432,220.00	3,099,623,366.60	2,487,996,734.26	243,454,472.79	305,324,976.00	(1,702,661,697.72)	24,884,772,387.50

11.5 Template CRC: Qualitative information on the mitigation of credit risk (Annual)

Country Risk team doesn't do any use of netting between on and off balance sheet exposures.

Citi UAE follows internal policy on collateral management for ICG and CCB has a local collateral management procedures in place.

Credit worthiness assessment of the borrower starts with clients relationship with the bank considering adequacy of supporting cash, savings, time deposit and eligible securities for Margin Lending. For margin lending, collateral is systematically Marked to market daily and monitored. Loanable Values for the collateralized securities are assigned based on volatility, liqudity and credit quality assessment. Margin lending facilities are monitored for concentration and systematic haircuts are applied for concentrated holdings.

Mortgage collateral values are assessed annually based on overall property price changes in publicly available quarterly property market report.

CCB UAE has portfolio level monitoring of unsecured exposures under the following categories:

- Unsecured exposures to Emerging Corporates (defined as companies with annual sales up to $50MM) based on ORR groups
- Unsecured exposure to traders and distributors of goods

Unsecured is defined as exposures not covered by approved collateral structures based on applicable approved advanced rates (per CCB UAE Collateral Scorecard under Citi Collateral Management policy). These are reported to regional and global office on quarterly basis.

Additionally, we do monitor the level collateral values of approved collateral structures (cash, real estate properties, account receivables) and financial SBLCs issued by another Citi entity or another acceptable bank. This is reported to regional office on quarterly basis.

In Margin Lending Strength of credit, loss mitigation and ability to pay is determined by the quality of pledged collateral (concentration, liquidity and volatility). Approx 99% of the current portfolio is categorized as A1 Diversified and Liquid with $99MM of surplus. The primary driver of this due highly diversified composition which is 94 % in Mutual Funds and 4 % in Cash out of $1.17 billion of collateral. Margin Lending book utlization rate is over 99% with average portfolio LTV of 57%

Mortgage portfolio maintains stable LTV trends with 73% of the total ENR sustaining less than 70% current LTV.

11.6 Template CR3: Credit risk mitigation techniques - overview (Semi-annual)

		a	b	c	d	e	f	g
		Exposures unsecured: carrying amount	**Exposures secured by collateral**	**Exposures secured by collateral of which: secured amount**	**Exposures secured by financial guarantees**	**Exposures secured by financial guarantees, of which: secured amount**	**Exposures secured by credit derivatives**	**Exposures secured by credit derivatives, of which: secured amount**
1	Loans	5,386,408,104	266,210	181,189	627,055	638,965	-	-
2	Debt securities	12,442,238	-	-	-	-	-	-
3	**Total**	5,398,850,342	266,210	181,189	627,055	638,965	-	-
4	Of which defaulted	50,423,466	212,104	-	-	-	-	-

11.7 Template CRD: Qualitative disclosures on banks' use of external credit ratings under the standardised approach for credit risk (Annual)

28 ECA out of which EXIM BANK, MIGA, K-SURE, KEXIM, HERMES, UKEF and BPIAE are the most used. ECA cover is mainly used for loans and advances.

ECA covered loans and advances are rated based on the benefit of higher ratings of the ECA guarantor. Accordingly, the asset that benefits from such ECA cover is rated and classified. The process that is used here is essentially map our internal ratings of ECA guarantor with that of the local asset. This process is followed via our detailed transactions and ratings approval policy.

ORR	1-year Probability of Default Range (%)	Average Probability of Default (%)	FRR	Loss Norm Range (bp)	Average Loss Norm (bp)	S&P *	Moody's*
1	0.00 - 0.01	0.00	1	0.0 - 0.3	0.0	AAA	Aaa
2+	>0.01 - 0.02	0.02	2+	>0.3 - 0.7	0.7	AA+	Aa1
2	>0.02 - 0.03	0.03	2	>0.7 - 1.0	1.0	AA	Aa2
2 -	>0.03 - 0.04	0.04	2-	>1.0 - 1.4	1.4	AA-	Aa3
3+	>0.04 - 0.05	0.05	3+	>1.4 - 1.7	1.7	A+	A1
3	>0.05 - 0.06	0.06	3	>1.7 - 2.1	2.1	A	A2
3 -	>0.06 - 0.09	0.07	3 -	>2.1 - 3.1	2.4	A -	A3
4+	>0.09 - 0.14	0.11	4+	>3.1 - 5.0	4	BBB+	Baa1
4	>0.14 - 0.26	0.17	4	>5 - 9	6	BBB	Baa2
4 -	>0.26 - 0.63	0.34	4 -	>9- 22	12	BBB-	Baa3
5+	>0.63 - 1.38	0.89	5+	>22- 48	31	BB+	Ba1
5	>1.38 - 2.64	1.87	5	>48 - 92	65	BB	Ba2
5 -	>2.64 - 4.48	3.39	5 -	>92 - 156	118	BB-	Ba3
6+	>4.48 - 7.04	5.57	6+	>156 - 245	194	B+	B1
6	>7.04 - 10.32	8.51	6	>245 - 359	296	B	B2
6 -	>10.32 - 14.40	12.16	6 -	>359 - 501	423	B -	B3
7+	>14.40 - 19.37	16.64	7+	>501 - 674	579	CCC+	Caa1
7	>19.37	22.13	7	>674	770	CCC	Caa2
7 -	>19.37	22.13	7 -	>674	770	CCC-	Caa3
8	n.a.		8	**	**		
9+	Default		9+	***	N/A		
9	Default		9	***	***		
10	Default		10	***	***	SD/D	

11.8 Template CR4: Standardised approach – credit risk exposure and CRM (Semi-annual)

		a	b	c	d	e	f
		Exposures before CCF and CRM		Exposures post-CCF and CRM		RWA and RWA density	
	Asset classes	On-balance sheet amount	Off-balance sheet amount	On-balance sheet amount	Off-balance sheet amount	RWA	RWA density
1	Sovereigns and their central banks	24,802,880	652	24,802,880	-	-	0%
2	Public Sector Entities	447,769	782,549	447,769	448,571	486,198	54%
3	Multilateral development banks	211	5,299	211	2,649	572	20%
4	Banks	3,701,529	4,017,814	3,701,529	3,838,188	3,503,558	46%
5	Securities firms	-	-	-	-	-	0%
6	Corporates	2,835,694	4,441,333	2,835,694	2,536,919	4,783,885	89%
7	Regulatory retail portfolios	5,237,962	7,484,472	5,237,962	29,301	4,400,609	84%
8	Secured by residential property	32,261	-	32,261	-	11,291	35%
9	Secured by commercial real estate	-	-	-	-	-	0%
10	Equity Investment in Funds (EIF)	-	-	-	-	-	0%
11	Past-due loans	317,950	2,175	22,005	2,175	19,829	82%
12	Higher-risk categories	-	-	-	-	-	0%
13	Other assets	1,279,349	-	1,279,349	-	1,485,584	116%
14	**Total**	**38,655,605**	**16,734,294**	**38,359,660**	**6,857,805**	**14,691,527**	**5.26**

11.9 Template CR5: Standardised approach – exposures by asset classes and risk weights (Semi-annual)

		a	b	c	d	e	f	g	h	i
	Risk weight / Asset classes	0%	20%	35%	50%	75%	100%	150%	Others	Total credit exposures amount (post CCF and post-CRM)
1	Sovereigns and their central banks	24,802,880	-	-	-	-	-	-	-	24,802,880
2	Public Sector Entities	-	262,361	-	400,509	-	233,471	-	-	896,341
3	Multilateral development banks	-	2,860	-	-	-	-	-	-	2,860
4	Banks	-	830,134	-	6,275,208	-	139,759	-	294,617	7,539,718
5	Securities firms	-	-	-	-	-	-	-	-	-
6	Corporates	274,748	303,869	-	71,649	-	4,488,608	-	233,739	5,372,614
7	Regulatory retail portfolios	71,691	1,086	-	-	3,176,378	2,018,109	-	-	5,267,263
8	Secured by residential property	-	-	32,261	-	-	-	-	-	32,261
9	Secured by commercial real estate	-	-	-	-	-	-	-	-	-
10	Equity Investment in Funds (EIF)	-	-	-	-	-	-	-	-	-
11	Past-due loans	4,351	-	-	-	-	19,829	-	-	24,180
12	Higher-risk categories	-	-	-	-	-	-	-	-	-
13	Other assets	88,938	-	-	-	-	993,629	-	196,782	1,279,349
14	**Total**	25,242,607	1,400,310	32,261	6,747,366	3,176,378	7,893,406	-	725,138	45,217,465

12. Counterparty Credit Risk (CCR)

12.1 Template CCRA: Qualitative disclosure related to CCR (Annual)

All counterparty limits are set in line with Citi's credit policies. Exposure is reviewed and measured against regulatory capital levels.

Credit mitgation is reviewed in line with Risk and Compliance policies. Credit mitigation can be done at both counterparty and portfolio levels at Citi. And is a factor of risk appetite.

Citi UAE abides by policy on Wrong-Way Risk Exposures

Any amount of collateral required would be subject to the relevant credit and collateral agreement negotiated between the bank and the counter party.

12.2 Template CCR1: Analysis of CCR by approach (Semi-annual)

		a	b	c	d	e	f
		Replacement cost	Potential future exposure	EEPE	Alpha used for computing regulatory EAD	EAD post-CRM	RWA
1	SA-CCR (for derivatives)	1,681,396	539,408		1.4	3,109,126	1,478,150
2	[redacted]						
3	Simple Approach for credit risk mitigation (for SFTs)						
4	Comprehensive Approach for credit risk mitigation (for SFTs)						
5	[redacted]						
6	**Total**						**1,478,150**

12.3 Template CCR3: Standardised approach – CCR exposures by regulatory portfolio and risk weights (Semi-annual)

	a	b	c	d	e	f	g	h
Risk weight / **Regulatory portfolio**	**0%**	**20%**	**50%**	**75%**	**100%**	**150%**	**Others**	**Total credit exposure**
Sovereigns	-	-	-	-	-	-	-	-
Public Sector Entities (PSEs)	-	-	-	-	-	-	-	-
Multilateral development banks (MDBs)	-	-	-	-	-	-	-	-
Banks	-	261,141	2,843,881	-	-	-	-	3,105,021
Securities firms	-	-	-	-	-	-	-	-
Corporates	-	-	-	-	3,282	-	823	4,105
Regulatory retail portfolios	-	-	-	-	-	-	-	-
Secured by residential property	-	-	-	-	-	-	-	-
Secured by commercial real estate	-	-	-	-	-	-	-	-
Equity Investment in Funds (EIF)	-	-	-	-	-	-	-	-
Past-due loans	-	-	-	-	-	-	-	-
Higher-risk categories	-	-	-	-	-	-	-	-
Other assets	-	-	-	-	-	-	-	-
Total	**-**	**261,141**	**2,843,881**	**-**	**3,282**	**-**	**823**	**3,109,126**

12.4 Template CCR5: Composition of collateral for CCR expoosure (Semi-annual)

Not applicable for CBNA UAE, since the bank does not have any instruments in scope.

12.5 Template CCR6: Credit derivatives exposures (Semi-annual)

	a	b
	Protection bought	Protection sold
Notionals		
Single-name credit default swaps		
Index credit default swaps		
Total return swaps	556,522	556,466
Credit options	5,003	5,286
FX forwards	37,518,884	37,518,884
Other credit derivatives		
Total notionals		
Fair values		
Positive fair value (asset)		
Negative fair value (liability)		

12.6 Template CCR8: Exposures to central counterparties (Semi-annual)

Not applicable for CBNA UAE, since the bank has no central counterparties.

13. Securitisation

Securitisation section is not applicable for CBNA UAE, since the bank does not have any instruments in scope of securitisation.

14. Market Risk

14.1 Template MRA: General qualitative disclosure requirements related to market risk (Annual)

Market risk is the risk to earnings or capital from adverse changes in Market factors such as interest rates, foreign exchange rates, equity and commodity prices, as well as their implied volatilities and other higher order factors. Market risk is measured through a complementary set of tools, including factor sensitivities, VaR, and stress testing and monitored daily in risk reports that compare exposures in FX and DV01 per currency and VaR against approved limits. Citi UAE does not transact in Equities and Commodities.

Market Risk Management adheres to Mark-to-Market Risk Policy, and the objectives are:

- Articulate standards for defining, measuring, monitoring and risk managing
- Mark-to-Market (“MTM”) risk,
- and develop a common language for discussing MTM risks.

- Promote the transparency and comparability of market risk-taking activities.
- Provide a consistent framework to measure market risk exposures in order to facilitate business performance analysis
- Identifying the key roles and responsibilities of Independent Market Risk and Front Office Trading team

Each business is required to establish, with approval from Citi UAE's Market Risk Management, a market risk limit framework for identified risk factors that clearly defines approved risk profiles and is within the parameters of the overall risk appetite. These limits are monitored by Independent Market Risk, Citi's country and ALCO. In all cases, the businesses are ultimately responsible for the market risks taken, for remaining within their defined limits, and notifying the relevant Independent Market Risk Manager of any shifts in business that require a change to the limit structure.

The Trading Market Risk of Citi UAE's trading portfolios is monitored using a combination of quantitative and qualitative measures, including, but not limited to:

- Factor sensitivity
- Value at risk (VAR)
- Stress testing

Each trading portfolio across Citi UAE's business segments has its own market risk limit framework encompassing these measures and other controls, including trading mandates, new product approval, permitted product lists and pre-trade approval for larger, more complex and less liquid transactions. All trading positions are marked to market, with the results reflected in earnings. Currently Citi UAE's trading book activity is undertaken in specific risk-taking units, which each have independent market risk limits. These limits are produced in conjunction with the business management based upon the strategies it wishes to run and the products and tenors permitted and approved by Independent Market Risk Management along with the ALCO. The overall aim of Market Risk is to continue to adhere to Citi's single set of standards for the measurement of market risk in order to ensure consistency across businesses, stability in methodologies, and transparency of market risk-taking activities.

Factor sensitivities are expressed as the change in the value of a position for a defined change in a market risk factor, such as a change in the value of a Treasury bill for a one-basis-point change in interest rates. Citi's independent market risk management ensures that factor sensitivities are calculated, monitored, and in most cases, limited, for all material risks taken in a trading portfolio.

Citi UAE performs stress testing on a regular basis to estimate the impact of extreme market movements. It is performed on individual positions and trading portfolios, as well as in aggregate inclusive of multiple trading portfolios. Citi's independent market risk management organization, after consultations with the businesses, develops both systemic and specific stress scenarios, reviews the output of periodic stress testing exercises, and uses the information to assess the ongoing appropriateness of exposure levels and limits.

14.2 Template MR1: Market risk under the standardised approach (Semi-annual)

		a
		RWA
1	General Interest rate risk (General and Specific)	5,136,312
2	Equity risk (General and Specific)	
3	Foreign exchange risk	148,139
4	Commodity risk	
	Options	
5	Simplified approach	
6	Delta-plus method	
7	[redacted]	
8	Securitisation	
9	**Total**	**5,284,451**

15. Interest Rate Risk in the Banking Book (IRRBB)

15.1 Template IRRBBA: IRRBB risk management objectives and policies (Annual)

The Non-Trading Market Risk Policy establishes the standards for defining, measuring, limiting and reporting Interest Rate Risk in the Banking Book (IRRBB) to ensure transparency, consistency and comparability of risk-taking activities at Citi UAE. IRRBB refers to the current or prospective risk to the bank's capital and earnings arising from adverse movements in interest rates that affect Citi UAE's banking book positions (all assets and liabilities on the balance sheet and any off-balance sheet items that generate net interest income).

<u>Roles & Responsibilities:</u>

It is the responsibility of the Independent Treasury Risk Manager and, where applicable the ALCO, to ensure that all Risk-Taking Units are identified and adhere to the Policy. Oversight for managing IRRBB is the responsibility of the Independent Treasury Risk Manager, with ALCO as the primary governance committee for the balance sheet.

Treasury – First Line of Defence responsibilities summary:

- Manage overall IRRBB for Citi UAE and ensure that the calculation methodology and assumptions applied are appropriate.
- Define strategy for IRRBB management and present monthly IRR metrics and variances to relevant ALCOs and committees
- Manage the IRRBB transferred from the businesses as well as risk created from its own positions
- Formulate and propose Limit/Trigger requests for IRRBB metrics within the Treasury Risk Appetite Framework. Ensure utilisation of all metrics is within the limits set.

Treasury Risk Management (TRM) – Second Line of Defence responsibilities summary:

- Provide independent oversight for IRR at all levels of the organization and establish the IRRBB Risk Appetite Framework
- Review and challenge proposals to establish or change Limits/Triggers
- Document and notify key stakeholders and ALCO of any Limit/Trigger approvals/changes (permanent or temporary exceptions) or in the event of any breach
- Review and challenge metrics results and variance analysis performed by Treasury and Risk Reporting

<u>Metric and Monitoring:</u>

Interest Rate Exposure (IRE) measures the potential pre-tax impact on net interest income (NII) for Banking Book positions, due to defined shifts in interest rates over a specified reporting period. NII is the difference between the accrued interest income earned on assets and the interest expense paid on the liabilities. NII is affected by factors such as changes in the level of interest rates, volumes, and customer rates. Interest rate levels could change due to a parallel or non-parallel move in the Yield Curve, and it could happen either instantaneously as of a given date, or gradually over time. IRE is measured against limits using the un-discounted impact of accounting earnings through NII from various Interest Rate shocks comprising of both parallel (e.g. +/-100bp, +/-200bp) and non-parallel stress scenarios over a 12 and 24 month horizon. The interest rate shocks are applied on a static balance sheet throughout the forecasted period. The balance sheet remains constant in terms of size and product mix regardless of the interest rate scenario, with maturing instruments being replaced/repriced with ones of the same original tenor. Re-pricing risks are modelled differently between contractual products and non-contractual products. Contractual items re-price at the earlier of re-pricing date or at maturity and non-contractual items re-price according to modelled volume and modelled rate forecasts. Non-interesting bearing deposits do not have any implications on net interest income calculations.

To measure the impact of interest rate changes on the economic value of equity (EVE) during the life time of the balance sheet, Economic Valuation Sensitivity (EVS) is used to measure the impact of interest rate changes vs. the firm's capital. This impact can be measured using Stress Test and risk sensitivities which are intended to capture the impact of Interest Rate changes on the economic value of Assets and Liabilities. Runoff models are applied to the Balance Sheet to derive the lifetime balances of the assets and liabilities with the assumption of no new/additional business. Cash flows are calculated off these lifetime runoff balances by applying respective rates and fees. The asset and liability cash flows are then discounted using benchmark rates with adjusted credit spreads, resulting in the Economic Value of Equity (EVE) base case valuation metric. To estimate changes in the economic value and in earnings, Interest Rate shocks of +/-100bps, and +/-200bps are applied over the full life cycle of every transaction. Stress tests are also performed using historical and hypothetical scenarios. Furthermore, on a quarterly basis, key stakeholders (Treasury, Treasury Risk, Finance, and the reporting team) gather for a formal attestation meeting where all model assumptions and data inputs are reviewed for accuracy.

IRE and EVS metrics are measured against limit levels, and are monitored on a monthly basis independently and by ALCO. Limits are set in accordance with the risk appetite framework. For instance, IRE limits are set by comparing two methods and choosing the lower of the two: 1) dividing the surplus earnings before tax (EBT) by the internal 1-in-10 year severe interest rate shock move or 2) five times the minimum historic exposure/utilisation over the last 12 months. EVS limits are set by dividing 15% of capital by the internal 1-in-10 year severe interest rate shock move, and then adding the value of offshore hedges of third party foreign currency deposits.

15.2 Template IRRBB1: Quantitative information on IRRBB (Annual)

In reporting currency (AED)	ΔEVE		ΔNII	
Period	**T**	**T-1**	**T**	**T-1**
Parallel up	498	1,198	181	260
Parallel down	-564	-424	-76	-21
Steepener	162	306		
Flattener	-58	-16		
Short rate up	159	476		
Short rate down	-196	-526		
Maximum	-564	-526		
Period	**T**		**T-1**	
Tier 1 capital	2,347		2,514	

Average repricing maturity assigned to NMDs: 1.87 years
Longest repricing maturity assigned to NMDs: 3.51 years

As per above results, Citi UAE's balance sheet is particularly sensitive to falling rates. From net interest income (NII) perspective, assets (such as Government Securities, Loan, and third party placements) are generally short term in nature. As a result, in a rising interest rate scenario (such as parallel up) there is a positive impact to interest income and in a falling interest rate scenario (such as parallel down) there is an adverse impact to interest income. Comparing impact to NII results between T (2021 end) and T-1 (2020 end), parallel up scenario for instance, NII has decreased by AED 79 Million to AED 181 million. The primary reason for this decrease, is due to an internal shift and increase in client deposits from non-interest bearing (NIB) to demand deposit line. For NII calculation, non-interest bearing deposits are not included in interest rate related shocks. Demand deposits on the other handed are included, and in a rising rate scenario (such as parallel up) the interest expense rises for such deposit categories compared to NIBs.

From EVE perspective, high utilisation is primarily driven due to non-interest-bearing deposits and demand deposits (with no defined maturity), having a long term treatment (>2 years) for EVE calculation. Long term treatment of current/savings deposits is driven by offshore hedging of third party foreign currency deposits. On behalf of Citi UAE, head office hedges/purchases long dated Government Securities with the aim of centralizing interest rate risk management. Comparing EVE results between T (2021 end) and T-1 (2020 end), parallel up scenario for instance, EVE has decreased by AED 700 Million to AED 498 million. The primary reason for this decrease, is due to an internal shift of client deposits from non-interest bearing to demand deposit line. Non-interest bearing deposits have an internal assumption of >3.5 years and demand deposits have assumption of 1.7 years.

16. Operational Risk

16.1 Template OR1: Qualitative disclosures on operational risk (Annual)

1. Operational Risk management (ORM) Policies, Frameworks, and Guidelines

1.1 Introduction to Operational Risk

Operational risk is the risk of loss resulting from inadequate or failed internal processes, people and systems, or from external events. It includes legal risk, which is the risk of loss (including litigation costs, settlements, and regulatory fines) resulting from the failure of the firm to comply with laws, regulations, prudent ethical standards, and contractual obligations in any aspect of the firm's business but excludes strategic and reputation risks. Citi also recognizes the impact of operational risk on the reputation risk associated with Citi's business activities. Operational Risk Management proactively assists the businesses, Operations, Technology, and other independent control groups in enhancing the effectiveness of controls and managing operational risks across products, business lines and regions.

Furthermore, operational risks are considered as new products and business activities are developed and processes are designed, modified, or sourced through alternative means. The objective is to keep operational risk at appropriate levels relative to the characteristics of Citi's businesses, the markets in which it operates, its capital and liquidity, and the competitive, economic, and regulatory environment.

1.2 Operational Risk Policy & Framework

To anticipate, mitigate and control operational risk, Citi maintains a system of policies and standards and has established a consistent framework for monitoring, assessing, and communicating operational risks and the overall effectiveness of the internal control environment across Citi. Citibank NA UAE (CBNA UAE) follows Citi's Global Framework and has defined its operational risk appetite and established a manager's control assessment ('MCA') process, through which CBNA UAE identifies, monitors, measures, reports on and manages risks and the related controls. CBNA UAE assesses its risks according to Citi's risk taxonomy, covering:

#	Operational Risk Taxonomy	#	Operational Risk Taxonomy
1	Bribery Risk	11	Money Laundering Risk
2	Customer/Client Protection	12	Physical Damage Risk
3	Cyber Risk (incl. information security)	13	Processing Risk
4	Data Risk	14	Prudential & Regulatory Risk
5	Financial Statement Reporting Risk	15	Regulatory and Management Reporting Risk
6	Fraud & Theft (excl Tech)	16	Risk Framework Design/Execution
7	Human Capital Risk	17	Sanctions Risk
8	Market Practices Risk	18	Technology Risk
9	Market Practices Risk	19	Third Party Risk

The process established by the ORM Framework is expected to lead to effective anticipation and mitigation of operational risk and improved operational risk loss experience and includes the following steps:

- Identify and assess the risks it undertakes
- Design controls to mitigate identified risks
- Establish Key Risk Indicators ('KRIs')
- Implement a process for early problem recognition and timely escalation
- Produce comprehensive operational risk reporting; and
- Ensure that sufficient resources are available to actively improve the operational risk environment and mitigate emerging risks

As new products and business activities are developed, processes are designed, modified, or sourced through alternative means and operational risks are considered.

2. The structure and organisation of their operational risk management and control function

2.1 Governance Structure:

Citi's "International Franchise Management" (IFM) classifies Presence Countries (Presence Countries are those countries in which Citi has staff locally) into three classifications – Diversified, Intermediate and Core - based on the size, complexity, and risk profile of the franchise. The Citi Country Officer (CCO)'s role, committee structure and staff structure are required to be aligned with the type of country that the CCO manages.

- Diversified: Diversified countries are Citi's largest franchises that generally have nearly all of Citi's businesses, many legal entities and often a significant presence in the local marketplace.
- Intermediate Countries: Generally mid-size franchises with increased complexity of governance compared to Core countries.
- Core: Core countries generally have only an institutional business presence and are characterized by lower level of regulatory complexity. The number of staff is smaller and the legal entity structure simpler.

IFM has classified UAE as a Diversified country and all legal vehicles operating in the U.A.E., including the CBNA UAE, are governed by the IFM mandated Corporate Governance Structure for a Diversified Country. At a minimum, Diversified Countries are required to have a "Country Coordinating Committee" (CCC), "Business Risk and Controls Committee" (BRCC), and "Asset and Liability Committee" (ALCO) Governance Committees. CBNA UAE conducts the management committees at franchise level covering all businesses operating within the U.A.E.'s geography.

2.2 Three Lines of Defense

While the management of risk is the collective responsibility of all employees, Citi assigns accountabilities into three lines of defense:

- **First Line of Defense:** owns the risks inherent in or arising from their business and is responsible for identifying, assessing and controlling those risks so that they are within risk appetite. These units may also conduct control and support activities.

- **Second Line of Defense:** Independent Risk Management: Independent risk management units are independent of a front-line unit. They are responsible for overseeing the risk-taking activities of the first line of defense and challenging the first line of defense in their execution of their risk management responsibilities. They are also responsible for independently identifying, measuring, monitoring, controlling and reporting aggregate risks and for setting standards for the management and oversight of risk. Independent risk management units also engage in in-unit control and in-unit management activities. Independent Risk Management comprises of Risk Management & Independent Compliance Risk Management (ICRM).

- **Third Line of Defense:** The role of Internal Audit is to provide independent and timely assurance to the Citigroup and CBNA Boards, the Audit Committees of the Boards, senior management and regulators regarding the effectiveness of governance, risk management and controls that mitigate current and evolving risks and enhance the control culture within Citi.

3. Measurement of Operational Risk

3.1 Internal Capital Adequacy Assessment Process ("ICAAP")

Citibank UAE on an annual basis perform Internal Capital Adequacy Assessment Process ("ICAAP") for determining appropriate minimum levels of capital to support the risk it carries. This is achieved though comprehensive review of its risk management and capital adequacy based on forecasts of both businesses as usual and stressed conditions over a three-year planning horizon. The conclusion of this review help Bank to have appropriate risk management and governance at a legal entity level and that the bank has sufficient capital, both currently and throughout the forecast period, under both base case and plausible stressed conditions. Operational Risk Pillar 1 capital is calculated using Standardised Approach.

3.2 Operational Risk Appetite Framework

The bank's objective is to ensure that risks taken are identified, understood, quantified (where possible), mitigated (where appropriate), communicated, appropriately captured in the bank's risk/reward assessment processes, and consistent with the principles of Responsible Finance. To achieve this, the bank establishes and enforces its expectations for risk-taking activities, including boundaries expressed through a holistic Risk Appetite Framework.

CBNA UAE Operational Risk Appetite approach incorporates quantitative and qualitative components to monitor operational risk within acceptable levels. Citi's goal is to keep operational risk at appropriate levels relative to the characteristics of all the businesses, the markets in which it operates, its capital and liquidity, and the competitive, economic, and regulatory environment.

3.2.1 Quantitative Boundaries / Limits

The quantitative boundaries are expressed by numerical 'tolerances' to monitor Operational Risk Appetite.

3.2.2 Qualitative Boundaries / Limits

The qualitative components describe how the Business assesses, measures, and manages its qualitative operational risks (including those risks that are difficult to quantify) and thus support a safe and sound risk culture that focuses on customers, creating economic value, and the integrity of the global financial system.

These qualitative components are captured in the group level Qualitative Risk Appetite Principles, specifically:

- The activities that Citi engages in must be consistent with our Mission and Value Proposition and key principles including our underlying commitment to the principle of Responsible Finance; and
- The foundation of Citi's Risk Culture is taking Intelligent Risk with Shared Responsibility, without forsaking Individual Accountability.

3.2.3 Monitoring and Reporting

The respective businesses / functions would be responsible for monitoring the metrics against the set thresholds on Quarterly basis (at a minimum) and submit the results to the CCC and BRCC.

3.2.4 Qualitative Boundaries / Limits

If any of the metrics breach the established thresholds mentioned in the Appendices, the root cause analysis and corresponding corrective action plans (as applicable) will also be brought to the attention of the CCC and BRCC.

3.3 Manager Control Assessment (MCA)

Citi Managers Control Assessment (MCA) is a comprehensive self-assessment program methodology and tools to allow management to enable risk and control identification, assessment & monitoring and residual risk management for all GRC Risks. MCA is focused on the most significant risks and key controls, i.e., the controls that mitigate those significant risks. MCA provides Citi's Management and Independent Risk and Control Functions a holistic view of Residual Risk Rating and insight into trends & drivers for their Business or function.

MCA uses the following tools for risk and control identification, assessment, monitoring and for residual risk management of all GRC Risks: (i) Enterprise MCA Profiles (EMPs) & Standard MCA Profiles (SMPs) (ii) Annual Risk Assessment (ARA) (iii) Continuous Risk Management & Monitoring (CRM); (iv) Quarterly Risk Assessment (QRA).

The MCA facilitates in ongoing control monitoring and the quarterly assessments would assist to identify new breaches, gaps, vulnerabilities and other risk and control issues not previously known by managers. Managers will assess issue materiality to differentiate and communicate the potential impact of control issues. Issues identified are captured & progress of the corrective action plans are monitored via the Integrated Corrective Action Plan System (iCAPS). Significant control issues, emerging risks and MCA results are consolidated and aggregated for review by the Business Risk and Controls Committees (BRCC) and similar control forum. The MCA also supports the management of GRC Risks and is a key component of the Business Environment and Internal Control Factors (BEICFs) required under the Basel Capital Standard. This Central Procedure is consistent with the requirements of the COSO 2013 Internal Control – Integrated Framework and complements Sarbanes-Oxley (SOX) Sections 302 and 404, to support overall Internal Control over Financial Reporting (ICFR).

During the quarterly MCA assessments, business managers assess the overall effectiveness of internal controls that mitigate their significant inherent operational risks (SIORS) and identify emerging risks to business activities and residual risks within an MCA Assessment Unit.

Inherent risks are assessed using two independent criteria: (i) Anticipated frequency of an Operational Risk Event, within a year, regardless of the amount; and (ii) Significance of impact of one severe, realistic risk event within a year.

Citi uses a Tier 1 to 5 scale, where Tier 1 is the highest risk and Tier 5 is the lowest risk.

Residual Risks are automatically derived as per a matrix defined in the GRC & MCA Procedures and Standards. Where the residual risk, at the Risk Category Level 1 in the GRC Taxonomy, is rated Tier 1, 2 or 3, appropriate actions are taken by the business managers to reduce the residual risk, which include: (i) Confirm that existing issues mapped to the relevant Risk Category are sufficient to mitigate the residual risk once the corrective action plans are completed; (ii) Raise additional issues in iCAPS to Enhance Key Controls or Reduce Inherent Risk; or follow the Risk Escalation Process.

3.4 Issue Management

Issues and Corrective Action Plans (CAPs) must be documented in Issue & CAP Management System (iCAPS) to assist businesses and functions in providing transparency on trends, managing risk, and strengthening control environment. Guidance is provided via the Assessment, Issue and Corrective Action Plan Policy. Issues reported are rated using a 1 – 5 severity scale, with Level 1 indicating “most severe” and Level 5 indicating “least severe”. Individual issues are assessed using Probability and Significance of Impact criteria, each of which is assessed independently of one another:

- Probability - based on the anticipated frequency of the Issue occurrence / materialization, within a year, regardless of the significance of impact.
- Significance of Impact of one severe, realistic Issue occurring / materializing within a year.

Additionally, as part of the GRC & MCA Central Procedures, high severity issues (Level 1 to 3) are required to be mapped to appropriate Activity, Risk and Control within the Units MCA as this impacts the overall Residual Risk Rating.

3.5 Internal Operational Risk Loss Data

The Bank has a clear process for identifying, accounting, and reporting events related to operational risk. Each loss (or gain) posted on the books of the Bank, is recorded in a global database (called CitiRisk: Op Risk Loss Capture system) in line with the thresholds as defined by Citi's Operational Risk Management Internal Loss Capture Reporting Central Procedures. An analysis of the significant losses reported are done to take the necessary corrective actions & implement mitigating controls.

1. Scope and main context of their reporting framework on operational risk to executive management and to the board of directors.

3.6 Governance of Operational Risk

Under the Citi Risk Governance Framework, BRCC covers Compliance Risk and Operational Risk. The BRCC provides a business / function forum across the three Line of defense for escalation and reporting of material Operational, Reputational, Legal, Compliance and Conduct Risk and control issues that could have a significant impact on Citi's strategic objectives, client's best interests or markets in which Citi operates.

3.7 Mandate of BRCC

The mandate of the BRCC is to govern and oversee that all compliance and operational risks material to its scope and mandate are adequately identified, monitored, reported, managed, and escalated, and appropriate action is taken in line with the firm-wide strategic objectives, risk appetite thresholds, and regulatory expectation, while promoting the culture of risk awareness and high standards of culture and conduct.

3.8 Key Responsibilities and Authority of BRCC

The UAE BRCC, within their delegated scope and mandate and without limitation, shall perform the following functions and can carry out additional actions as may be appropriate in light of changing business, legislative, or regulatory conditions.

Responsibilities of the BRCC include:

- Review Operational and Compliance Risk aspects that include Manager's Control Assessment (MCA), Compliance Risk Assessment, and Internal Audit reports.
- Review significant deficiencies or material weaknesses in the design or operation of Citigroup's internal control over financial reporting, and any fraud involving management or other employees who have a significant role in Citigroup's internal control over financial reporting.
- Review significant regulatory and control remediation including significant long dated Issues (e.g., level 1 and 2) from all sources (e.g., External/Regulatory, Internal Audit, 2nd line and business self-identified), and including major change management projects.
- Review significant operational risk events (e.g., actual losses and near misses) including the root causes and actions to prevent re-occurrence (e.g., Lessons Learned).
- Institute a consistent three lines of defense dialogue and understanding of material compliance and operational risks and related control issues, affecting Citigroup and Citibank, NA and the other legal vehicles through which Citi operates.

- Oversee accountability and ownership of material risks and issues (i.e., accountable owners are identified and held to account, issues and actions are recorded and tracked, monitored and distributed, and adequate action is taken when repeat issues are identified).
- Review and monitor new and emerging material compliance and operational risks from an inherent and residual perspective including any material changes in operational risk profiles and direct initiatives when appropriate to mitigate them.
- Drive timely escalation and reporting of material risks and issues from business and regional BRCCs and, where applicable, to external third parties (e.g., regulatory agencies). Such escalation will be clearly documented in the meeting minutes. The Governance Committee will routinely follow up on the status of action items with respect to escalated issues.
- Challenge BRCC members and presenters to promote the oversight role of the BRCC and thereby promote risk management in keeping with Citi's Risk Governance Framework and Appetite.

The Committee also serves as the escalation channel on any matters arising from key governance committees within the business. Accordingly, the BRCC forum shall facilitate the development of a clear understanding of the practices, governance and risks applicable to the franchise and how those risks may affect the franchise.

The CCO or designee serves as the Committee chair (the "Chair") & the committee is composed of a cross-section of senior management and key functional leaders supporting the businesses including Compliance, Operational Risk Management (ORM), Finance, Human Resources (HR), Legal, Operations & Technology (O&T), Risk, Internal Audit (IA) & Business Heads. Furthermore, the Committee may invite any person from the Business for advice and support. The BRCC meet as frequently as it deems necessary but not less than quarterly.

3.9 BRCC Agenda

Below are recommended Agenda Items for the committee meeting:

Internal Audit	**Operational Risk Management (ORM)**
▪ Composite view on Control Issues and Environment ▪ Update on existing and forthcoming IA reviews	▪ Issues Management Summary ▪ ORM thematic review results, themes and trends observed ▪ Operational Risk events (Actual, Near Miss, Boundary), Back testing results ▪ External Events
Escalation	**Update from Other Committees / working groups**
▪ Matters for reporting to other Committees, Boards and Risk and Control Forums	▪ Local Regulatory Reporting Update ▪ Third Party Management (TPM) Updates ▪ Regional Account Review Forum
Spotlight / Other Significant Items	**Independent Compliance Risk Management (ICRM), Anti Money Laundering (AML) & Legal Update**
▪ Business Model, Strategic or Organizational changes affecting or requiring changes to the governance, risk	▪ Compliance breaches, Compliance Risk Assessments, Regulatory Exams (including any material enquiries /

and control environment, including any planned and ongoing change management projects and initiatives that impacts the country ▪ Review of applicable MCA ratings / results / control weaknesses, risk themes, CAPs, residual and emerging risk and control issues ▪ Issues and CAP Management, including updates on near-due items ▪ Significant updates from Operations & Technology (O&T), including IS / Cyber Risk, High Severity Tech Issues ▪ Update on key projects / initiatives (existing and forthcoming) ▪ New Products Update, i.e. NPAC, MPAC, COMPAC, and DPAC / Review of material changes to Product Programs ▪ Overview of any Lessons Learned reports ▪ Non-Compliance with regulatory requirements including potential or actual breaches and "at risk" implementations of new or updated regulatory requirements (including regulatory reporting) ▪ Any other significant item, that needs BRCC attention	criticism or feedback received during the reporting period), Changes to internal policies and procedures, Forthcoming regulations, Applicable industry wide fines and regulatory reprimands / actions, Emerging Risks, Compliance trainings update ▪ Highlights from ICRM reviews, including any recommendations ▪ AML Updates; Update on KYC & Sanctions, Anti-Bribery & Corruption (AB&C) ▪ Legal Update e.g., Litigation & Law update, Legislative Changes

2. Risk mitigation and risk transfer used in the management of operational risk.

Citi's Financial Institution Blanket Bond Corporate Protection program provides coverage for all of Citi's majority owned subsidiaries worldwide. The program applies to losses arising from acts of burglary, robbery, theft, employee dishonesty, forgery, counterfeiting, and similar offenses occurring on premises or in transit to financial property owned or in the subsidiary's legal care, custody, or control. There is more than $100,000,000/- in additional coverage more than $50,000,000/- each and every loss.

Annexure – I Operational Risk Taxonomy

Operational Risk Level 1	Operational Risk Level 1 Definition	Operational Risk Level 2
Bribery Risk	Bribery is the offering, promising, giving, or agreeing to give, and the accepting, requesting, and agreeing to accept, of Anything of Value directly or indirectly to or from a government official, or any other person, to influence an improper action or inaction, secure an improper advantage, or induce the improper performance of a responsibility by the recipient. Authorizing such activity is also considered Bribery, as is providing payment to a third party while, knowing, or having reason to know that some or all of it will be passed along to secure an improper advantage, or to cause the recipient to perform his or her duties improperly. Bribery Risk is a category of Compliance Risk that covers the risk arising from violations of, or non-conformance with, applicable anti-bribery laws and regulations, pay to play laws, the Citi Anti-Bribery Policy, and related policies, standards, and procedures. Bribery Risk includes breakdowns of key anti-bribery processes to prevent, detect, and take appropriate actions in connection with business activities that pose increased Bribery Risk: receipt of anything of value, provision of value to government official, and provision of value to commercial person.	Provision to Commercial Person Risk
		Provision to Government Officials Risk
		Receipt of Anything of Value Risk
Customer/Client Protection	The risk of adverse consequences arising from violations of, or non-conformance with, applicable customer and client protection laws, rules, regulations, policies, standards and procedures, as well as the risk of Citi employees or agents intentionally or through negligence - harming customers or institutional clients through inappropriate and/or inadequate product or service design, or failure to exercise reasonable care while executing a properly designed process.	Client Data Confidentiality & Privacy Risk
		Customer Treatment Risk
		Disclosure and Misrepresentation Risk
		Fiduciary Risk
		Pricing & Fee Assessment Risk
		Product & Service Design Risk
		Protected Customer / Discrimination Risk
		Safeguarding Assets
		Suitability Risk
		Unauthorized Customer or Client Activity Risk
Cyber Risk (incl. information security)	Risk to Citi's organizational operations (including mission, functions, image, reputation), organizational assets, individuals, other organizations, and the Nation due to the potential for unauthorized access, use, disclosure, disruption, modification, or destruction of information and/or information systems.	System and information protection risk
Data Management Risk	Risk of inadequate data management and governance practices that hinder data quality, management decision making, and internal and external reporting, which could result in one or more of the following adverse outcomes: (i) reputational impact (ii) financial losses and/or (iii) regulatory fines.	Data Architecture Risk
		Data Quality Risk
Financial Statement Reporting Risk	Risk arising from failed mandatory financial reporting obligations under generally accepted accounting practices.	Financial Statement Reporting Risk
		External Fraud Risk

Operational Risk Level 1	Operational Risk Level 1 Definition	Operational Risk Level 2
Fraud & Theft (excl Tech)	Risk due to dishonest use or appropriation of assets, resources, services or benefits.	External Theft Risk
		Internal Fraud & Theft Risk
Human Capital Risk	Risk arising from acts inconsistent with employment, health or safety laws or agreements, from payment of personal injury claims, or from diversity / discrimination events.	Employee Relations Risk
		Remuneration & Rewards Risk
		Talent Acquisition Risk
		Talent Management Risk
		Workforce Protection Risk
		Workforce Relations Risk
Market Practices Risk	The risk of adverse consequences to the integrity of the markets arising from: (i) violations of, or non-conformance with, applicable market integrity protection laws, rules, regulations, policies, standards and procedures, or (ii) errors made by an employee or agent of Citi by failing to exercise reasonable care while executing a properly designed process, or (iii) a Citi employee or agent executing a poorly or improperly designed process.	Anti-Competitive Risk
		Automated Trading / System Runaway
		Insider Trading Risk
		Market Manipulation Risk
Model Risk	Risk of potential adverse consequences from decisions based on incorrect or misused model outputs and reports. This includes where a Model does not meet conceptual soundness criteria, has model limitations, unexpected performance deterioration or has fundamental errors.	Model Design and Implementation Risk
		Model Use Risk
Money Laundering Risk	Risk arising from the failure to comply with AML laws, regulations, rules, related self-regulatory organization standards and firm policies. Money Laundering risk includes the risk that the firm's processes and controls are insufficient to prevent and/or detect money laundering, terrorist financing, evasion of tax liabilities or other criminal activities, as well as the risk that regulatory or financial reporting is incomplete or untimely.	AML Detection Risk
		AML Governance & Enterprise-Wide Controls Risk
		AML Prevention Risk
		AML Reporting Risk
Physical Damage Risk	Risk arising from loss or damage to physical assets from natural disaster or other events.	Natural Disasters Risk
		Physical Accident Risk
		Physical Infrastructure Unavailability Risk
		Wilful Damage Risk
Prudential & Regulatory Risk	The risk arising from ineffective regulatory relationships, and inadequate change management of prudential regulations, practices that jeopardize the safety and soundness of legal entities through which Citi conducts business and establish licenses and registrations. This category also includes the risk arising from a failure by boards, board committees, and senior executive management governance committees to oversee risk governance structure; as well as the risk arising from conflicts of interest. This excludes risks relating to transaction level governance and oversight activities, and to laws, rules, regulations and policies and procedures covered under the other compliance or operational risk categories	Compliance Risk Framework Design and Execution Risk
		Conflict of Interest Risk
		Corporate Governance Risk
		Prudential Standards Risk
		Compliance Risk Framework Design and Execution Risk
Processing Risk	Processing risk is defined as the risk of untimely, inaccurate or incomplete processes caused by unintentional human error carried out to set up, execute and settle a transaction. Processing Risk applies across Citi's core activities including safeguarding assets, lending, payments and accessing the capital markets, as well as internal activities	Account Set up & Reference Data Risk
		Collateral & Margin Management Risk
		Initial Transaction Capture & Execution Risk

Operational Risk Level 1	Operational Risk Level 1 Definition	Operational Risk Level 2
	performed to support the Citi franchise. This includes errors in account set up and reference data, initial transaction capture, transaction maintenance, payments and settlements, physical asset handling and collateral/margin management. It excludes pre and post transaction processing activities such as Know Your Customer (KYC), financial/client/regulatory reporting, risk and P/L production and fraud determination. Processing Risk also excludes risk driven by IT failures which is covered under Technology Risk.	Physical Asset Handling Risk Settlement & Payments Risk Transaction Maintenance Risk
Reporting Risk	Risk from failed mandatory reporting obligation and inaccurate reports.	Financial Reporting Risk Internal Management Reporting Risk Legal Entity Reporting Risk Liquidity Reporting Risk Regulatory Reporting Risk
Risk Framework Design/Execution	Risk arising from gaps within or failed adherence to Citi's Risk Frameworks, its design, related regulations, systems, policies or procedures.	Operational Risk Framework Design and Execution Risk Risk Framework Design/Execution Operational Risk Framework Design and Execution Risk
Sanctions Risk	Sanctions Risk is a category of Compliance Risk that covers the risk arising from breaches, violations of, or non-conformance with, applicable sanctions laws and regulations, and Citi's Global Sanctions Policy and related sanctions standards and procedures. Sanctions Risk includes circumvention and violation of applicable sanctions, as well as breakdowns of key sanctions control processes to detect, investigate, escalate, take appropriate actions (e.g., block, reject), and report business activities (i.e., accounts, relationships, securities holdings, and transactions) that relate to a target of applicable sanctions.	Blocks or Freezes Risk Processing of prohibited transactions Risk of provision of prohibited account/financial services Sanctions-Related Regulatory Reporting Risk
Technology Risk	Risk arising from disruption of business or system failures	IT Benefit / Value Enablement Risk IT Operations and Service Delivery Risk IT Program / Project Delivery Risk
Third Party Risk	Risk arising from an individual or entity that has entered, or may enter, into a business arrangement, by contract or otherwise, to provide products or services to a Citi entity or otherwise has an ongoing business relationship (other than a customer/consumer or employee relationship) with Citi. Includes internal and external third parties.	Third Party Authorization Risk Third Party Corporate Performance Risk Third Party Oversight Risk Third Party Service Delivery Risk

Annexure – II Risk Appetite Statements

Risk Appetite Statement summary by Risk Category adopted at a group level are as follows & the same are also applicable to Citibank NA, UAE:

Risk Type	Appetite Statement Summary
Bribery Risk	Citi has Low Bribery Risk appetite.

	Citi has No tolerance for violations or non-conformance with applicable anti-bribery laws and regulations or breaches of the Citi Anti-Bribery Policy. Citi has low tolerance for: • Controlled Bribery Risks introduced by inadvertent and isolated anti-bribery control process breakdowns. First Line (i.e., business management) and Global Functions acting as First Line (e.g., Human Resources) behaviors that negatively affect: the implementation regulatory changes, the allocation of resources to in-business anti-bribery control processes, or the timely, comprehensive, and sustainable resolution of bribery-related issues.
Customer or Client Protection Risk	Citi has a Low Customer or Client Protection Risk Appetite. Citi has no tolerance for: • Employees or agents whose intentional actions result in harm to customer or clients. • Violations of, or non-conformance with, local, national, or cross-border laws, rules, and regulations. • Breaches of internal policies. Citi has a low tolerance for employees or agents' actions resulting in harm to customers or clients through negligence due to inappropriate and / or inadequate product or service design or a failure to exercise reasonable care while executing a properly designed process.
Data Management Risk	Citi has a low-risk appetite for data management risk.
Fraud Risk (excl. Technology)	Citi does not tolerate: • Fraud committed by its staff and non-compliance with regulations. • Untimely or incomplete escalation of fraud events to Senior Management. Citi has medium appetite for residual external fraud risk reflecting those losses do occur and businesses are required to make conscious trade-offs between competing factors.
Governance & Prudential Risk	Citi has a Low Governance and Prudential Risk Appetite. Citi has No tolerance for: • Violations of, or non-conformance with, governance and prudential related local, national, or cross-border laws, rules and regulations. • Breaches of governance and prudential-related internal Policies. • RegulatoryEnforcementActionsandequivalentthatarerelatedtogovernanceandprudentialrisk. Citi has a Low tolerance for late implementation of governance and prudential-related laws, rules and regulations that are effective 30 days or more after publication. In such cases, Citi will implement regulatory change in a timely manner.
Human Capital Risk	Citi's overall Human Capital Risk appetite is low, but Citi has zero tolerance for: • Employing people that present risk to the firm, discriminatory and retaliatory employment practices • Discriminatory and/or retaliatory employment practices. • Violations of applicable employment, immigration, pension, benefits and social laws, as well as health and safety regulations • Rewarding or failing to create accountability for unapproved risk taking • Failing to create accountability for employee misconduct that bears material impact to the firm • Failing to escalate, investigate and review issues that may be material to the firm. Citi recognizes mistakes or exceptions may occur but has a low risk tolerance for: • Inappropriate terms and conditions of employment • Ineffective performance management • Poor workplace sentiment • Untimely processing of employee terminations • Non-competitive selection process Inability to attract and retain talent
Market Practices Risk	Citi has a low-risk appetite for Market Practices Risk. Citi has No tolerance for:

	• Employees or agents whose intentional actions interfere with the free and fair operation of the markets • Violations of, or non-conformance with, local, national, or cross-border laws, rules, and regulations. • Breaches of internal policies Citi has a low tolerance for employees or agents' actions resulting in harm to customers or clients through negligence due to inappropriate and / or inadequate product or service design or a failure to exercise reasonable care while executing a properly designed process.
Model Risk	Citi has low tolerance for model risk based on the businesses and functions using models.
Money Laundering Risk	Citi has a low ML Compliance Risk Appetite. Citi has No tolerance for: • Violations or non-conformance of local, national, or cross-border AML laws, rules and regulations. • Breaches of Citi's AML internal policies. • Citi's Products and Services being intentionally misused for the purposes of money laundering, terrorist financing, evading taxes or other illegal activities. • Employees or Third-Party Supplier that knowingly facilitate money laundering, terrorist financing, tax evasion or any other financial crimes. Citi has a low AML risk tolerance for: • Issues in operational activities and control processes. Interpretation of and response to regulatory developments that results in a non-compliant status for a temporary period. Citi will exercise responsible discretion, where policy allows and where legally permissible, to comply with changing laws and regulations on a timely basis.
Physical Damage Risk	Citi has a low tolerance for: • Risks arising from damage to physical assets due to external factors. Physical damage to Citi assets resulting in financial impact or business disruptions.
Processing Risk	Citi has a low overall risk appetite for processing risk caused by unintentional human error. Citi's most critical asset is that of its employees and accepts that a certain level of risk related to human intervention may occur during normal business activities.
Reporting Risk	Citi has zero tolerance for reporting errors in relation to BCBS regulatory / management reports and a low tolerance for all other material regulatory / management reports as systems and legal entities are rationalized.
Sanctions Risk	Citi has a low Sanctions Risk Appetite. Citi has no tolerance for violations or non-conformance with applicable sanctions laws and regulations or breaches of the Sanctions Policy. Also, Citi has low tolerance for: • Controlled Sanctions Risks introduced by inadvertent and isolated sanctions control process breakdowns First Line (i.e. business management) behaviors that negatively affect the implementation of sanctions regulatory changes, the allocation of resources to in-business sanctions control processes, or the timely, comprehensive, and sustainable resolution of sanctions-related issues.
Technology Risk (incl. Cyber)	Loss of System Availability • Citi seeks to minimize loss of system availability that degrades performance of Citi's network and applications, for example, as a result of cyber-attacks. • When technology outages occur, recovery of service is expected to take place within the timeframes defined by a business's recovery time objectives. Insufficient Data Security • Citi seeks to minimize the intentional exposure of data, compromise of data integrity and loss of data availability as a result of unauthorized systems access, whether caused by internal or external parties. • Citi recognizes that unintentional or negligent, non-malicious activities may result in unauthorized exposure of data, compromise of data integrity and loss of data availability and seeks to minimize these risks by implementing business and security controls and conducting workforce training. • Citi may accept an elevated level of risk related to data security when progressing selected innovative products and capabilities, but Citi expects that compensating

	controls for these innovative products and capabilities be introduced within a reasonable timeframe to responsibly manage the risk. Insufficient Data Quality • Citi seeks to minimize inadequate data quality that impacts the accuracy or timeliness of regulatory and financial reporting, customer-facing services, key management reports, and the surveillance of transaction activity. • Citi may accept an elevated level of risk related to data quality where limitations in technology relate only to routine, non-risk and non-regulatory-related reporting, & are supported by appropriate compensating controls to process data until such time that they can be integrated into Citi's information architecture. Fraudulent Activity • Citi recognizes that it is not possible to eliminate the risk of financial loss due to fraud but seeks to minimize weaknesses in technology or technology management processes that enable or exacerbate losses related to fraudulent activity or for lapses in employee conduct, oversight processes and internal controls intended to safeguard against fraudulent activity. Transaction Processing Errors • Citi seeks to minimize financial losses caused by defects, design flaws, or misconfiguration where technology does not meet specified business requirements, or technology solutions or changes that are not implemented in accordance with Citi's technology standards and procedures. Legal / Regulatory Non-Compliance Citi prioritizes technology delivery and operations to support and remain compliant with legal and regulatory requirements.
Third Party Risk	Citi does not tolerate: • Violations of applicable laws or regulations by third parties • Fraud committed by a directly contracted third party (or their employees or agents) against Citi or a Citi Client. Additionally, Citi has a low appetite for: • Behaviors or misrepresentations by third parties that may harm, injure, or adversely impact Citi's brand, assets, or clients • Failure of third parties to protect Citi's informational and physical assets • Threats to Citi or client assets arising from external malicious attacks through third parties Financial risks created by third parties when managing Citi or client assets
Risk Oversight Errors	Citi's appetite for risk oversight errors risk is as follows: • Low tolerance for risk oversight errors risks, and each of its individual elements, including credit / market / liquidity and operational risks. No tolerance for violations of laws and regulations, and Citi risk policies.

17. Remuneration Policy

17.1 Template REMA: Remuneration policy (Annual)

Compensation Philosophy

Employee compensation is a critical tool for Citi to attract and retain top talent and successfully execute our corporate goals. Effective compensation programs appropriately balance the incentives offered to employees who take risks to achieve financial and competitive performance objectives and the need to prudently manage those risks along with other imperatives. The Personnel and Compensation Committee of Citi's Board of Directors (the "Committee") oversees the design and operation of Citi's compensation programs. The link to the Committee charter can be found under this link: https://www.citigroup.com/citi/investor/data/percompcharter.pdf

To assist with this objective, the Committee is advised by its independent consultants and delegates certain tasks to Citi management as appropriate. Citi routinely reviews and revises our compensation programs to reflect changing circumstances. We use such programs as tools to help Citi properly balance risk-taking and risk-mitigating incentives. The membership of the Committee can be found under this link:

https://www.citigroup.com/citi/investor/data/bddircom.pdf

CITI's Principle Compensation Objectives

The principal objectives of our compensation program are listed below:

- Incentivize conduct that aligns with shareholder and other stakeholder interests
- Reinforce a business culture based on accountability, achieving excellence and maintaining the highest ethical and control standards through Citi's Leadership Principles
- Encourage prudent individual and group decision-making in regards to risk consistent with applicable regulatory guidance and Citi's Mission and Value Proposition Statement
- Function as a tool to attract and retain the best talent and to reward talent for engaging in appropriate behaviors that support Citi's corporate goals
- Encourage behaviors that are in the best interests of our customers, shareholders and the goals of the organization, including environmental and social principles
- Align realized pay with achievement of important risk and control, regulatory, strategic and financial-based objectives

Shareholder and Other Stakeholder Alignment

Use a scorecard approach with financial metrics and nonfinancial objectives, including a focus on environmental, social and corporate governance, to link pay to performance to compensate executives and other senior managers. Provide meaningful portions of incentive compensation for executives and other senior managers in the form of equity to help to build a culture of ownership and to align employee interests with those of shareholders. Defer the delivery of significant portions of equity-based incentive compensation for executives and other senior managers over a number of years to tie compensation earned to the returns of long-term shareholders. Require that executive officers hold a substantial amount of Citi stock for at least one year after the end of their service as executive officers.

Ethics, Culture and Leadership Principles

Develop a culture that supports accountability and an environment that discourages unethical conduct, through appropriate and consistent compensation and employment decisions. Embody Citi's Leadership Principles that represent the qualities, behaviors and expectations we all must exhibit to deliver on our mission of enabling growth and economic progress by:

- We Take Ownership - challenging one another to a higher standard in everything we do
- We Deliver with Pride - striving for client excellence, controls excellence and operational excellence
- We Succeed Together - valuing and learning from different perspectives to surpass stakeholder expectations
- Ensure that compensation decisions across our workforce are equitable.

- Communicate throughout the organization that acting with integrity at all times is the foundation of our business and ensure that senior leadership's tone reflects Citi's ethical standards and culture.
- Promote culture and conduct through performance assessments, incentive compensation programs and, where appropriate, disciplinary actions

Risk Management and Regulatory Guidance

Design incentives that reward a thoughtful balance of risk and return and penalize undue risk-taking. Exercise discretion concerning risk-related compensation outcomes in a disciplined, proportionate and consistent manner.

Encourage prudent risk-taking by all employees who manage or influence material risks through a combination of design features, including:

a) rigorous performance
b) discretionary compensation funding and individual bonus determination processes that reflect risk-adjusted performance, and
c) deferrals that keep a meaningful portion of incentives at risk for future performance and control outcomes.

Retrospectively and periodically evaluate incentive compensation program results, recognizing that validation and monitoring may reveal inconsistent application of standards or the inappropriate exercise of discretion, and then make adjustments to in-process and future compensation decisions when necessary.

Communicate clearly to all employees that poor risk and control management practices and imprudent risk-taking activity will lead to an adverse impact on incentive compensation, including the loss of incentive compensation and the reduction or elimination of previously awarded incentive compensation.

Reinforce consistent shared accountability through the organization. Involve Citi's Independent Risk, Independent Compliance Risk Management and Internal Audit functions in compensation governance and oversight.

Design incentive compensation programs with the recognition that global regulation of bank incentive compensation is continuously evolving and that Citi's programs must be responsive to these regulations, emerging trends and best practices. Where appropriate, develop innovative and industry-leading approaches that reflect regulatory considerations in compensation structures and designs.

Attract, Retain and Reward Talent

Provide compensation programs that are competitive within global financial services to attract the best talent to successfully execute the company's strategy. Differentiate individual compensation to reflect employees' current or prospective contributions, based on both financial and non-financial performance, such as risk and control behaviors, and to reward those employees who demonstrate ingenuity and leadership.

Clearly and consistently communicate Citi's approach to compensation throughout the year, cascading such communications broadly to employees through key value statements such as

Citi's Code of Conduct, Leadership Principles and the statements and actions of senior management and managers generally.

Encourage the Best Behaviors

Provide for adjustment, cancellation and clawback of incentive compensation in cases of improper risk-taking, misconduct, and material adverse outcomes Compensate employees based on the achievement of goals, embodiment of Citi's Leadership Principles, and risk-adjusted performance demonstrated over time, balanced with appropriate recognition for short-term results and contributions. Exercise discretion in disciplined and predictable ways to enhance the incentive for, and perceived value of, good performance and the certainty of equitable and proportionate consequences of inappropriate conduct.

Align Pay with Performance

Adjust compensation from year-to-year and over extended periods to reflect market rates as well as overall Citi and individual executive performance, with goals tied to key areas of accountability and factors that each executive influences including:

- Risk and Controls performance
- Financial performance
- Client / Franchise performance
- Leadership performance

17.2 Template REM1: Remuneration awarded during the financial year (Annual)

			a	b
	Remuneration Amount		**Senior Management**	**Other Material Risk-takers**
1	Fixed Remuneration	Number of employees	**3**	
2		Total fixed remuneration (3 + 5 + 7)	**4,659,697**	
3		Of which: cash-based	4,300,384	
4		Of which: deferred	-	
5		Of which: shares or other share-linked instruments	-	
6		Of which: deferred	-	
7		Of which: other forms	359,313	
8		Of which: deferred	-	
9	Variable Remuneration	Number of employees	**3**	
10		Total variable remuneration (11 + 13 + 15)	**4,688,994**	
11		Of which: cash-based	2,981,260	
12		Of which: deferred	-	
13		Of which: shares or other share-linked instruments	1,707,734	
14		Of which: deferred	1,707,734	
15		Of which: other forms	-	
16		Of which: deferred	-	
17	**Total Remuneration (2+10)**		**9,348,691**	

17.3 Template REM2: Special payments (Annual)

Special Payments	**Guaranteed Bonuses**		**Sign on Awards**		**Severence Payments**	
	Number of employees	**Total amount**	**Number of employees**	**Total amount**	**Number of employees**	**Total amount**
Senior Management	0	0	0	0	0	0
Other material risk-takers	0	0	0	0	0	0

17.4 Template REM3: Deferred remuneration (Annual)

	a	b	c	d	e
Deferred and retained remuneration	**Total amount of outstanding deferred remuneration**	**Of which: Total amount of outstanding deferred and retained remuneration exposed to ex post explicit and/or implicit adjustment**	**Total amount of amendment during the year due to ex post explicit adjustments**	**Total amount of amendment during the year due to ex post implicit adjustments**	**Total amount of deferred remuneration paid out in the financial year**
Senior management					
Cash	1,829,647	1,829,647			713,760
Shares	1,639,970	1,639,970			689,303
Cash-linked instruments					
Other					
Other material risk-takers					
Cash					
Shares					
Cash-linked instruments					
Other					
Total					