

## Regulator

The Office of the Comptroller of the Currency (OCC) is the primary regulator of Citi's business lines that principally operate through Citibank, N.A. or its subsidiaries. Citibank, N.A. is subject to periodic examinations and reviews by the OCC with the schedule of such exams and reviews decided by the OCC. The OCC regulates, supervises and examines national banks, including non-U.S. branches of Citibank, N.A.

- Citibank, N.A. is examined on an announced or unannounced basis by the National Bank Examiners of
  the OCC. Their examination includes a review of procedures and controls to ascertain compliance with
  the applicable regulations governing the processing of securities transactions and the safekeeping of
  clients' securities.
- Citibank, N.A. is regulated by the Federal Reserve Board and is covered by the statutes and regulations
  applicable to banks under the Federal Deposit Insurance Act. Citibank, N.A.'s deposits are subject to
  regulation and examination by the Federal Deposit Insurance Corporation, a U.S. government agency.
- Service centers may also be subject to local laws and regulations in the countries where the services are being performed.

## Global and Local Anti-Money Laundering (AML) Policies

AML standards are applied as per global standard and also as per procedures established locally. Citi is subject to regulation under U.S. federal and state laws, as well as applicable laws in the other jurisdictions in which it does business.

Citi has established and continues to maintain a Global AML Policy designed to, at a minimum, verify that Citi and all of its businesses are in compliance with all applicable laws, rules, and regulations related to AML and anti-terrorist financing initiatives.

## Compliance with Sanctions Lists

Citi, and each of its businesses, have undertaken due diligence to know its customers. There is no reason to believe that any of Citi's customers are prohibited shell banks, an individual or entity, that is named on a list issued by the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC), or an individual or entity that resides, is organized or chartered, or has a place of business, in a county or territory subject to OFAC's various sanctions/embargo programs (except for customers with whom OFAC has expressly provided authority for transactions by means of regulations, rulings, instructions, licenses or otherwise), or named on any available government lists of known or suspected terrorists or terrorist organizations issued by the government of the jurisdiction in which a Citigroup business conducts business, as applicable."