



CODE OF ETHICS FOR FINANCIAL PROFESSIONALS

OWNER:
Citi CFO

CONTACT(S):
CITI FINANCE

ISSUE DATE:
DECEMBER 24, 2004

REVISED DATE:
OCTOBER 2, 2018

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1 OVERVIEW

1.1 OBJECTIVE, SCOPE AND TARGET AUDIENCE

The Citi Code of Ethics for Financial Professionals applies to Citi's Chief Executive Officer (Principal Executive Officer), Chief Financial Officer (Principal Financial Officer) and Controller (Principal Accounting Officer) and all Finance Professionals and Administrative Staff in a finance role, including but not limited to Controllers, Finance & Risk Shared Services (FRSS), Finance & Risk Infrastructure (FRI), Financial Planning & Analysis and Strategy, Treasury, Tax, M&A, Investor Relations and the Regional/Business teams.

Citi expects all of its employees to act in accordance with the highest standards of personal and professional integrity in all aspects of their activities, to comply with all applicable laws, rules and regulations, to deter wrongdoing and abide by the Citi Code of Conduct and other policies and procedures adopted by Citi that govern the conduct of its employees. This Code of Ethics for Financial Professionals is intended to supplement the [Citi Code of Conduct](#).

1.2 OWNER

This Code is owned by the Citi CFO. This Code, and any changes to this Code, must be approved by the Citi CFO.

1.3 EFFECTIVE DATE / TRANSITION PERIOD

This Code is effective October 2, 2018.

1.4 RETIRED POLICIES / RELATED POLICIES

This Code was reformatted to Citi's Standards in March 2006 and last amended in December 2016.



2 CODE STATEMENT

Citi Code of Ethics for Financial Professionals

You agree to:

- a) Engage in and promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- b) Avoid conflicts of interest and to disclose to the Chief Compliance Officer any material transaction or relationship that reasonably could be expected to give rise to such a conflict;
- c) Take all reasonable measures to protect the confidentiality of non-public information about Citi or its subsidiaries and their customers obtained or created in connection with your activities and to prevent the unauthorized disclosure of such information unless required by applicable law or regulation or legal or regulatory purposes;
- d) Produce full, fair, accurate, timely and understandable disclosure in reports and documents that Citi or its subsidiaries files with, or submits to, the Securities and Exchange Commission and other regulators and in other public communications made by Citigroup or its subsidiaries;
- e) Comply with applicable governmental laws, rules and regulations, as well as the rules and regulations of self-regulatory organizations of which Citi or its subsidiaries is a member;
- f) Read, understand and comply with all applicable Citi Finance policies, standards, procedures, programs and guidelines located on the Citi Policy Directory at <https://policydirectory.citi.net/cpd/pages/default.aspx>; and
- g) Promptly report any possible violation of the Code of Ethics for Financial Professionals to the Chief Compliance Officer or any of the parties or channels listed in the Citi Code of Conduct.

You are prohibited from directly or indirectly taking any action to fraudulently influence, coerce, manipulate or mislead Citi or its subsidiaries' independent public auditors for the purposes of rendering the financial statements of Citi or its subsidiaries misleading.

You understand that you are responsible for ensuring a strong control environment, including the adequacy of design of control and ongoing monitoring of operational effectiveness of key controls, especially those that relate to the accuracy and completeness over the financial processes of Citi. Accordingly, you are responsible for conducting the appropriate due diligence (both as a maker and/or checker where applicable) prior to approving/authorizing any process that is assigned to you to ensure compliance with Citi policies, standards, procedures, programs, and guidelines.

You understand that you will be held accountable for your adherence to this Code of Ethics for Financial Professionals. Your failure to observe the terms of this Code of



Ethics for Financial Professionals may result in disciplinary action, up to and including termination of employment. Violations of this Code of Ethics for Financial Professionals may also constitute violations of law and may result in civil and criminal penalties for you, your supervisors and/or Citi.

If you should have any questions regarding the best course of action in a particular situation, you should promptly contact the Chief Compliance Officer or the Citi Ethics Hotline. You may choose to remain anonymous in reporting any possible violation of this Code of Ethics for Financial Professionals.



3 CODE ATTESTATION

Your Personal Commitment to the Citi Code of Ethics for Financial Professionals

I attest that I have received and read the Citi Code of Ethics for Financial Professionals, dated October 2, 2018, and understand my obligations as an employee to comply with the Code of Ethics for Financial Professionals as well as all applicable Citi-wide and Citi Finance policies, standards, procedures, programs and guidelines.

I understand my compliance role, responsibilities and accountability with respect to the financial processes both directly assigned to me and overall for Citi's benefit.

I understand that my agreement to comply with the Code of Ethics for Financial Professionals does not constitute a contract of employment.