Private Bank

Citi Investment Management

Periodic Disclosures – Citi Global Equity ESG Focus Portfolio

SFDR: Template periodic disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

Product name[1]: Citi Global Equity ESG Focus Portfolio or Tailored Discretionary Portfolio utilizing the investment processes from the Citi Global Equity ESG Focus Portfolio.

Legal entity identifier: Citibank Europe plc (Luxembourg Branch) N1FBEDJ5J41VKZLO2475 ("CEP")

Environmental and/or social characteristics

Did this financial product have a sustainable investment objective?

☐ Yes ☒ No

☐ It made **sustainable investments with an environmental objective:** ___%

- ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- ☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ It made **sustainable investments with a social objective:** ___%

☐ **It promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of _____% of sustainable investments

- ☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- ☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- ☐ with a social objective

☒ It promoted E/S characteristics, but **did not make any sustainable investments**

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities.** That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

To what extent were the environmental and/or social characteristics promoted by this financial product met?

In the period running from 1 January 2024 to 31 December 2024 (the "reference period"), the environmental and/or social characteristics promoted by this financial product were met by adhering to an investment process which used a combination of positive screening and exclusion criteria to define an investment universe for the respective portfolio.

Citi Global Equity ESG Focus Portfolio followed the binding elements which determined investment selection based on data sourced from third-party environmental, social and governance ("ESG") data provider, and/or CIM assessment, as set out in the pre-contractual disclosure made for the purposes of Article 8(1) of SFDR, and these binding elements were met as follows:

1. The current index used in connection with this financial product, communicated either in the Investment Management Account Application and Agreement, or through separate notice, which is used to establish a base universe was screened so that only investments which exhibited favourable ESG ratings (as defined below as a sustainability indicator) were included.
2. From this investable universe, companies which are 'non-compliant' with UN Global Compact ("UNGC") Principles or were regarded as UNGC by our third-party ESG data provider and/or CIM assessment were excluded.

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

[1]This periodic report has been prepared at the level of the Citi Global Equity ESG Focus Portfolio strategy (the "Strategy"). If you invest in a Tailored Discretionary Portfolio that incorporates the Strategy or have any other special investment instruction or limitation that is applied to the Strategy within your portfolio, certain information in this disclosure may not wholly reflect your actual holdings in such portfolios. If this applies to you, and you would like to receive a periodic disclosure which is specific to your own portfolio composition, contact your Citi private banker.

3. The investment process excluded companies that had greater than 10% revenue in a company's prior fiscal year from either production or distribution of the following product types as assessed by our third-party ESG data provider and/or CIM assessment:
   A. Alcohol
   B. Adult Entertainment
   C. Gambling
   D. Tobacco (producers)
   E. The following Fossil Fuel Categories:
      i. Thermal Coal Generation
      ii. Shale Gas Production
      iii. Shale Oil Production
      iv. Oil Sands
      v. Arctic Oil and Gas

In certain cases, CIM may complement the third party data provider's ESG assessment with its own. Based on our internal fundamental review we may include positions in the financial products that, based on the third-party data, appear to fail any of the above binding elements, where we believe that the third-party data is insufficient, incomplete or inaccurate, and based on our own fundamental analysis, the company is compliant with the binding elements above. We follow a similar process for issuers that are not covered by the third-party data provider. Similarly, we may exclude positions that appear to meet one or more of the criteria above, but where we disagree with the third-party data based on our own fundamental analysis or other data sources.

How did the sustainability indicators perform?

In the reference period, there were no breaches and/or exceptions identified to any of the sustainability indicators set out below. The exclusion data was updated monthly and the ESG scores were updated annually (in the first quarter of 2024).

- Sustainability indicators embedded in our ESG ratings: The financial product used positive screening so that only the top 50% by sector scoring investments which exhibit favourable ESG ratings as defined by our third-party ESG data provider and/or CIM assessment were included in an investable universe. Scores are evaluated on an annual basis and names that have dropped out of the top 50% because of the individual security market cap size can be held at the portfolio's manager discretion.
- UNGC: The financial product successfully excluded companies from the investable universe using sustainability indicators relating to 'non-compliance' with UNGC Principles or violation of the UNGC.
- Excluded sectors: The financial product successfully excluded companies that had greater than 10% revenue in its prior fiscal year from either production or distribution of the following product types: alcohol, adult entertainment, gambling, tobacco (producers), and fossil fuel (specifically, thermal coal generation, shale gas production, shale oil production, oil sands, and arctic oil and gas).

...and compared to previous periods?

The categories of sustainability indicators were amended as follows:

- The use of Citi Investment Management (CIM) fundamental assessment was added to the categories of sustainability indicators. This allows the inclusion of investments in the Portfolio that adequately manage ESG risks, as defined in the Sustainability Indicators above, either as measured by third-party data provider's ratings, and/or as determined by CIM assessment. CIM may exclude investments from the Portfolio, where CIM disagrees with third-data data based on CIM assessment.

The exclusion criteria applicable to companies having greater than 10% revenue in a company's prior fiscal year from either production or distribution of the following product types have been amended as follows:

- Companies with a direct or indirect association with manufacturing or distributing Civilian Firearms have been removed from the exclusions associated to weapons.

Tobacco retailers are removed from the exclusions.

Arctic Oil and Gas are added to the exclusions under Fossil Fuel Categories.

In the previous reference period (from 1 January 2023 to 31 December 2023), there were no breaches and/or exceptions identified to any of the sustainability indicators set out.

What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?

N/A — the financial product did not make any sustainable investments.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?

N/A – the financial product did not make any sustainable investments.

How were the indicators for adverse impacts on sustainability factors taken into account?

N/A – the financial product did not make any sustainable investments.

Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

N/A – the financial product did not make any sustainable investments.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

How did this financial product consider principal adverse impacts on sustainability factors?

This financial product considered the following principal adverse impacts ("PAIs"):

PAI 4: Exposure to companies active in the fossil fuel sector: The financial product considered this PAI through the application of exclusion criteria that map across to this PAI (partly). By excluding companies with more than 10% revenue from activities in certain fossil fuel sectors (as described in the items above), CEP mitigated the overall impact of this PAI.

PAI 10: Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises: The financial product considered this PAI through the application of exclusion criteria that map across to this PAI (wholly). By excluding companies flagged as 'non-compliant' with UNGC Principles or are regarded as UNGC Violators, CEP mitigated the overall impact of this PAI.

PAI 14: Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons): The financial product considered this PAI through the application of exclusion criteria that map across to this PAI (wholly). By excluding companies with a direct or indirect association with manufacturing or distributing Controversial Weapons, CEP mitigated the overall impact of this PAI.

What were the top investments of this financial product?

The list includes the investments constituting **the greatest proportion of investments** of the financial product during the reference period which is: 1 January 2024 to 31 December 2024

Citi Global Equity ESG Focus Portfolio

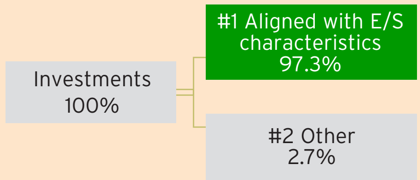
Largest Investments		Sector	Country	% Assets
NVDA	NVIDIA CORP	Information Technology Sector	United States	6.0%
AAPL	APPLE INC	Information Technology Sector	United States	5.7%
GOOGL	ALPHABET INC	Communication Services Sector	United States	5.3%
MSFT	MICROSOFT CORP	Information Technology Sector	United States	5.0%
UNH	UNITEDHEALTH GROUP INC	Health care Sector	United States	2.3%
CYBR	CYBERARK SOFTWARE LTD	Information Technology Sector	United States	2.2%
SGO	CIE DE ST-GOBAIN	Industrials Sector	France	2.2%
DTE	DEUTSCHE TELEKOM	Communication Services Sector	Germany	2.1%
CLH	CLEAN HARBORS INC	Industrials Sector	United States	2.0%
6758	SONY GROUP CORPORA	Consumer Discretionary Sector	Japan	1.9%
CS	AXA SA	Financials Sector	France	1.9%
DBSDF	DBS GROUP HLDGS	Financials Sector	Singapore	1.7%
PANW	PALO ALTO NETWORKS INC	Information Technology Sector	United States	1.7%
AH	KON AHOLD DELHAIZE	Consumer Staples Sector	Netherlands	1.7%
SU	SCHNEIDER ELECTRIC	Industrials Sector	France	1.7%

Asset allocation describes the share of investments in specific assets.

What was the proportion of sustainability-related investments?

- ***What was the asset allocation?***

The financial product invested 97.3% in investments aligned with the environmental or social characteristics described above. The financial product also invested 2.7% in investments that do not have environmental or social characteristics, held for the purposes of efficient portfolio management.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

- ***In which economic sectors were the investments made?***

Citi Global Equity ESG Focus Portfolio: Communication Services (8.6%), Consumer Discretionary (10.0%), Consumer Staples (4.5%), Energy (2.4%), Financials (12.7%), Health Care (12.1%), Industrials (10.8%), Information Technology (28.4%), Materials (3.4%), Real Estate (1.4%), Utilities (3.0%)

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?

N/A – the financial product did not make any sustainable investments.

- **Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy[2]?**

☐ Yes

☐ In fossil gas ☐ In nuclear energy

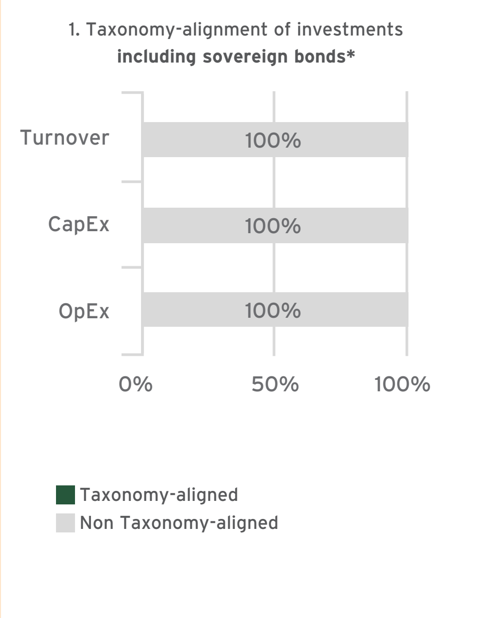
☒ No

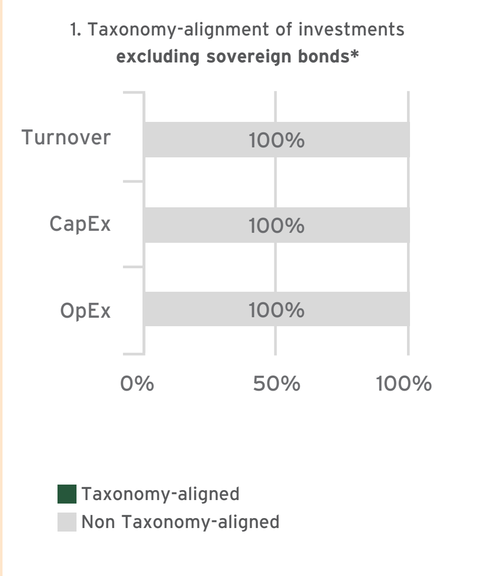
[2]Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies

The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*





This graph represents 100% of the total investments.

*For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

- ***What was the share of investments made in transitional and enabling activities?***

  N/A – the financial product did not invest in transitional and enabling activities.

- ***How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?***

  N/A – the financial product did not make any investments aligned with the EU Taxonomy.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the Regulation (EU) 2020/852.

What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?

N/A – the financial product did not make any sustainable investments.

What was the share of socially sustainable investments?

N/A – the financial product did not make any sustainable investments.

What investments were included under "other", what was their purpose and were there any minimum environmental or social safeguards?

Cash or cash equivalents, including securities issued by money market mutual funds, held for the purposes of efficient portfolio management. No minimum environmental or social safeguards were applied to such investments.

What actions have been taken to meet the environmental and/or social characteristics during the reference period?

During the reference period, financial product has ensured all the binding elements related to the environmental and/or social characteristics were met by adhering to the investment process, as described above.

Through its exclusion criteria, the financial product considered the following PAIs by removing entirely from the investable universe, and/or limiting the exposure to, companies that did not meet the financial product's requirements:

- PAI 4: Exposure to companies active in the fossil fuel sector.
- PAI 10: Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.
- PAI 14: Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons).

Finally, the financial product aimed to sustain an allocation of at least 80% in investments aligned with the environmental or social characteristics set out in the pre-contractual disclosure. The actual allocation is reported under *"What was the asset allocation?" above*).

Engagement is not directly part of the environmental or social investment strategy promoted by the financial products. The financial product does not have any procedures applicable to sustainability-related controversies in investee companies. However, we engage with investee companies through our proxy voting preferences, which may direct votes to issues aligned to some sustainability matters.

How did this financial product perform compared to the reference benchmark?

N/A. No specific index has been designated as a reference benchmark to meet the sustainable investment objective.

How does the reference benchmark differ from a broad market index?

N/A. No specific index has been designated as a reference benchmark to meet the sustainable investment objective.

How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?

N/A. No specific index has been designated as a reference benchmark to meet the sustainable investment objective.

How did this financial product perform compared with the reference benchmark?

N/A. No specific index has been designated as a reference benchmark to meet the sustainable investment objective.

How did this financial product perform compared with the broad market index?

N/A. No specific index has been designated as a reference benchmark to meet the sustainable investment objective.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.