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**Citibank (Hong Kong) Limited**

**Regulatory Disclosures**

**For the Year ended  
December 31, 2024**

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## **Introduction**

### **Purpose and Basis of preparation**

The information contained in this document is for Citibank (Hong Kong) Limited (“the Company”), and is prepared in accordance with the Banking (Disclosure) Rules (“BDR”) and disclosure templates issued by the Hong Kong Monetary Authority (“HKMA”).

These regulatory disclosures are governed by the Company’s disclosure policy, which has been approved by the Board. The disclosure policy sets out the governance, control and assurance requirements for publication of the document.

The information in this document is not audited and does not constitute statutory accounts.

### **The Regulatory Disclosures**

The Company's Regulatory Disclosures at 31 December 2024 comprises information required under the framework of the Basel Committee on Banking Supervision (“BCBS”). The disclosures are made in accordance with the latest BDR issued by the HKMA.

According to the BDR, disclosure of comparative information is not required unless otherwise specified in the standard disclosure templates.

# Template KM1: Key prudential ratios

The following table provides an overview of the key prudential ratios of the Company.

In thousands of Hong Kong dollar		(a)	(b)	(c)	(d)	(e)
		At December 31, 2024	At September 30, 2024	At June 30, 2024	At March 31, 2024	At December 31, 2023
	<b>Regulatory Capital</b>					
1	Common Equity Tier 1 (CET1)	23,396,639	26,902,926	25,902,953	25,201,834	24,638,120
2	Tier 1	23,396,639	26,902,926	25,902,953	25,201,834	24,638,120
3	Total capital	24,200,529	27,711,370	26,706,787	25,999,227	25,449,514
	<b>Risk-Weighted Assets (RWA)</b>					
4	Total RWA	88,524,972	91,382,186	89,783,632	91,068,608	94,738,459
	<b>Capital Adequacy Ratios</b>					
5	CET1 ratio (%)	26.43%	29.44%	28.85%	27.67%	26.01%
6	Tier 1 ratio (%)	26.43%	29.44%	28.85%	27.67%	26.01%
7	Total capital ratio (%)	27.34%	30.32%	29.75%	28.55%	26.86%
	<b>Additional CET1 buffer requirements</b>					
8	Capital conservation buffer requirement (%)	2.500%	2.500%	2.500%	2.500%	2.500%
9	Countercyclical capital buffer requirement (%)	0.502%	0.992%	0.992%	0.988%	0.986%
10	Higher loss absorbency requirements (%) (applicable only to GSIBs or DSIBs)	0.000%	0.000%	0.000%	0.000%	0.000%
11	Total AI specific CET1 buffer requirements (%)	3.002%	3.492%	3.492%	3.488%	3.486%
12	CET1 available after meeting the AI's minimum capital requirements (%)	19.34%	22.32%	21.75%	20.55%	18.86%
	<b>Basel III leverage ratio</b>					
13	Total leverage ratio (LR) exposure measure	330,520,453	339,845,043	336,178,746	335,022,995	334,062,256
14	LR (%)	7.08%	7.92%	7.71%	7.52%	7.38%
	<b>Liquidity Maintenance Ratio (LMR)</b>					
17a	LMR (%)	65.30%	67.69%	68.80%	66.69%	62.79%
	<b>Core Funding Ratio (CFR)</b>					
20a	CFR (%)	181.11%	178.55%	177.43%	170.29%	162.25%

## **Table OVA: Overview of risk management**

Effective risk management is of primary importance to the Company overall operations. Accordingly, the Company's risk management process has been designed to monitor, evaluate and manage the principal risks it assumes in conducting its activities. Specifically, the activities that the Company engages in, and the risks those activities generate, must be consistent with the Company's mission and value proposition, the key principles that guide it, and risk appetite.

Citi's overarching Enterprise Risk Management Framework and Company's Risk Management Framework consist of management of risk by risk category, Risk Culture, Risk Governance Structure (i.e. Board, Executive Management Team and Lines of Defense), Strategic Planning fully integrated with the defined Risk Appetite, Risk Management System i.e. Risk identification through the policies, procedures, and processes which the Company identifies, measures, monitors, controls and reports risks across the firm. Independent Risk Management, in conjunction with other independent control and enterprise support functions, reviews and updates this Enterprise Risk Management Framework at least annually and as needed to address any modifications that may be required because of any material changes to the firm or its operating environment.

Board Risk Management Committee (RMC) of the Company is a standing committee of the Board, which serves to identify, measure, mitigate, and control all Top / Material risks that the Company takes during its business activities. It assists the Board in fulfilling its oversight responsibility and covers the review of risk management strategies, risk appetite, and Risk Management Framework.

The Company utilizes a Risk Taxonomy that supports firm-wide frameworks including the Enterprise Risk Management Framework. The Risk Taxonomy include the following risk categories: Credit risk, Liquidity Risk, Market Risk (Trading / Non-Trading, including interest rate risk), Operational Risk, Compliance risk, Reputation risk and Strategic risk. Additionally, the Company is exposed to risks that may materialize in, or arise from, more than one risk within or across multiple risk categories (e.g., credit risk and operational risk), creating crosscutting risks. Crosscutting risks include conduct risk, country risk and climate-related risk. Additionally, centralized programs may be established to enable an integrated approach for managing individual risks that are linked together by a common set of characteristics / themes, such as risks relating to digital assets, e-trading and operational resilience.

An effective risk management framework requires a strong risk culture composed of shared values and expected behaviors to promote safe and sound risk taking across the firm, in line with the firm's strategy and risk appetite. Citi's firm-wide conduct and culture programs are designed to: (i) set, reinforce and enhance the firm's risk culture; (ii) integrate its values and conduct expectations into the organization; and (iii) provide employees with tools to assist with making prudent and ethical risk decisions and escalate issues appropriately. As part of this risk culture, all employees are accountable for risk management and must identify, escalate, and address risk-taking activities that exceed the Company's risk appetite in a timely manner.

Stress testing is an integral component of how the Company measures risk and supports business-as-usual risk management, as well as capital and liquidity assessment and planning, strategic and operating planning and recovery and resolution planning. Stress tests are forward-looking assessments of the potential impact of various adverse events and circumstances on the Company. The Company's Enterprise Stress Testing Policy establishes the framework for evaluating the impact of the adverse and / or stressful events and circumstances on its operations and financial conditions. Stress testing is performed for individual risk categories, products and portfolios and to evaluate aggregations of risks at an overall Company level.

The Company uses a lines of defense model as a key component of the Enterprise Risk Management Framework to manage its risk. The model comprises units that create and own risks (first line of defense), those that independently oversees risk taking activities and challenges first line in their execution of risk management activities risk (second line of defense) and units that provide independent assurance (third line of defense). Additionally, the firm has units tasked with maintaining a strong control environment (Enterprise Support Functions).

### **First Line of Defense: Front Line Units and Front-Line Unit activities**

The first line of defense ("first line") owns the risks and associated controls inherent in, or arising from, the execution of their business activities and is responsible for identifying, measuring, monitoring, controlling and reporting those risks consistent with Citi's strategy, Mission and Value Proposition, Leadership Principles and risk appetite. The first line is subject to the oversight and challenge by Independent Risk Management (IRM)/ Independent Compliance Risk Management (ICRM).

## **Table OVA: Overview of risk management (continued)**

o In addition, front line units engage in in-unit control and in-unit management activities. These activities benefit the front-line unit through (i) the performance and/or support of the management of risks generated by the unit (i.e., in-unit control); or (ii) the performance of activities that are critical to risk management (e.g., talent, performance management, compensation; program management; governance).

o Front line units are responsible and held accountable for managing the risks associated with their activities within the boundaries set by independent risk management. They are also responsible for designing and implementing effective internal controls and maintaining processes for managing their risk profile, including through risk mitigation, so that it remains consistent with the Company's established risk appetite.

o Front line units may also conduct enterprise support activities which are also subject to the relevant Bank-wide independent risk management oversight processes specific to the risk category that they generate (e.g., operational risk, compliance risk, reputation risk).

Other than the front-line Business units, a number of Corporate Functions, due to their nature of responsibility, are considered as First Line of Defense. These include Chief Operating Office, Enterprise Services and Public Affairs, Finance, Technology and Business Enablement.

### **Second Line of Defense: Independent Risk Management**

The second line of defense ("second line") is independent of the first line. The second line is responsible for overseeing the risk-taking activities of the first line and challenging the first line in their execution of their risk management responsibilities. It is also responsible for independently identifying, measuring, monitoring, controlling and reporting aggregate risks and for setting standards for the management and oversight of risk.

The second line is comprised solely of Independent Risk Management (IRM) and Independent Compliance Risk Management (ICRM) and is led by the Group CRO and Group Chief Compliance Officer respectively.

### **Third Line of Defense: Internal Audit**

Internal audit is independent of front-line units and independent risk / compliance risk management. The role of Internal Audit is to provide independent, objective, reliable, valued and timely assurance to the Board of Directors, and its Audit Committee as relevant, senior management and regulators over the effectiveness of governance, risk management and controls that mitigate current and evolving risks and enhance the control culture.

### **Enterprise Support Functions:**

Human Resources (HR) and Global Legal Affairs (including Legal, Regulatory Strategy & Policy, and Citi Security and Investigative Services) are the Enterprise Support Functions. They engage in activities that support safety and soundness across the Company. While these functions are not considered part of the second line of defense, they provide advisory services and/or design, implement, maintain, and oversee firm-wide programs that support maintaining an effective control environment. As noted above, any front-line unit activities within enterprise support functions remain subject to the relevant Bank-wide independent risk management oversight processes specific to the risk categories for which it is accountable.

## Template OV1: Overview of Risk-Weighted Assets

The following table provides an overview of capital requirements in terms of a detailed breakdowns of RWAs for various risks.

In thousands of Hong Kong dollar		(a)	(b)	(c)
		RWA		Minimum capital requirements
		At December 31, 2024	At September 30, 2024	At December 31, 2024
1	Credit risk for non-securitization exposures	76,625,110	79,817,394	6,130,009
2	Of which STC approach	76,625,110	79,817,394	6,130,009
6	Counterparty default risk and default fund contributions	16,024	12,228	1,282
7	Of which SA-CCR approach	16,024	12,228	1,282
10	CVA risk	15,113	13,338	1,209
16	Securitization exposures in banking book	-	-	-
18	Of which SEC-ERBA (including IAA)	-	-	-
20	Market risk	37,550	72,663	3,004
21	Of which STM approach	37,550	72,663	3,004
24	Operational risk	11,831,175	11,466,563	946,494
27	<b>Total</b>	<b>88,524,972</b>	<b>91,382,186</b>	<b>7,081,998</b>

The Company has adopted the “standardized approach” for the calculation of the risk-weighted assets for credit risk, market risk, and operational risk.

The Company does not have any credit-related derivatives and exposures to CCPs as at December 31, 2024.

### Template LI1: Differences between accounting and regulatory scopes of consolidation and mapping of financial statement categories with regulatory risk categories

The following table shows the differences between the carrying values as reported in the Company's financial statements following the scope of accounting consolidation and the carrying values under the scope of regulatory consolidation, with a breakdown into regulatory risk categories of every item of the assets and liabilities reported in financial statements based on the scope of accounting consolidation.

At 31 December, 2024:

In thousands of Hong Kong dollar	(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 securitization framework	subject to market risk framework	not subject to capital requirements or subject to deduction from capital
<b>Assets</b>							
Cash and balances with banks and other financial institutions	22,055,584	3,434,463	3,434,463	-	-	-	-
Placements with banks and other financial institutions	18,203,031	59,391,994	59,391,994	-	-	-	-
Loans and advances							
Loans and advances to customers	119,422,318	119,983,632	119,983,632	-	-	-	-
Loans and advances to banks	22,559,519	-	-	-	-	-	-
Financial assets measured at fair value through profit or loss	66,319,181	66,237,609	66,237,609	-	-	-	-
Financial assets measured at fair value through other comprehensive income	70,530,284	70,530,284	70,530,284	-	-	-	-
Fixed assets	296,112	89,890	89,890	-	-	-	-
Intangible assets	10,112	10,112	-	-	-	-	10,112
Deferred tax assets	62,923	62,923	-	-	-	-	62,923
Other assets	2,069,600	2,359,220	1,765,143	31,046	-	-	563,031
Impairment allowances	-	(393,462)	(54,851)	-	-	-	(338,611)
<b>Total assets</b>	<b>321,528,664</b>	<b>321,706,665</b>	<b>321,378,164</b>	<b>31,046</b>	<b>-</b>	<b>-</b>	<b>297,455</b>
<b>Liabilities</b>							
Deposits and balances from banks and other financial institutions	39,848,537	39,848,537	-	-	-	-	39,848,537
Deposits from customers	252,723,987	252,901,988	-	-	-	-	252,901,988
Trading financial liabilities	50,627	50,627	-	-	-	-	50,627
Current taxation	199,214	199,214	-	-	-	-	199,214
Other liabilities	4,751,730	4,751,730	-	-	-	-	4,751,730
<b>Total liabilities</b>	<b>297,574,095</b>	<b>297,752,096</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>297,752,096</b>



## Template LI2: Main sources of differences between regulatory exposure amounts and carrying values in financial statements

The following table provides information on the main sources of differences between the carrying values in financial statements and the exposure amounts used for the calculation of regulatory capital in respect of the assets and liabilities based on the scope of regulatory consolidation.

At 31 December, 2024:

In thousands of Hong Kong dollar		(a)	(b)	(c)	(d)	(e)
		Total	Items subject to:			
			credit risk framework	securitization framework	counterparty credit risk framework	market risk framework
1	Asset carrying value amount under scope of regulatory consolidation (as per template LI1)	321,409,210	321,378,164	-	31,046	-
2	- Liabilities carrying value amount under regulatory scope of consolidation (as per template LI1)	-	-	-	-	-
3	Total net amount under regulatory scope of consolidation	321,409,210	321,378,164	-	31,046	-
4	Off-balance sheet amounts	84,699,046	216,159	-	-	-
5	Potential exposures for counterparty credit risk	22,450	-	-	22,450	-
6	Alpha ( $\alpha$ ) used for computing default risk exposure	21,399	-	-	21,399	-
7	Recognized collateral for Credit risk mitigation	(10,846,489)	(10,846,489)	-	-	-
8	Net open position for foreign exchange exposures	37,550	-	-	-	37,550
9	Exposure amounts considered for regulatory purposes	310,860,279	310,747,834	-	74,895	37,550

## **Template LIA: Explanations of differences between accounting and regulatory exposure amounts**

The following provides explanations on the differences observed between accounting carrying values (as defined in template LI1) and amounts considered for regulatory capital purposes (as defined in template LI2).

### **Major differences between the amounts in columns (a) and (b) in template LI1**

i) The carrying values as reported in published financial statements are after Netting adjustment on account of foreign currency margin products.

ii) The carrying values of “Placement with banks and other financial institutions” as reported in published financial statements which have residual contractual maturities within one month are classified as “Cash and balances with banks, central banks and other financial institutions”, while balances with residual contractual maturities greater than one year are classified as “Loans and advances”.

### **The main drivers for the differences between accounting values and amounts considered for regulatory purposes shown in template LI2**

i) Exposure amounts considered for regulatory purposes consist of Off-balance sheet exposures including contingent liabilities and commitments after application of Credit Conversion Factor (“CCF”).

ii) Counterparty credit risk exposures for regulatory purposes consist of both the replacement cost and potential future exposures (“PFE”).

iii) Under the SA-CCR approach, a factor  $\alpha$  of 1.4 is applied to the sum of replacement cost and PFE in arriving at the default risk exposure.

iv) Exposures amount is calculated after deducting credit risk mitigation under standardized approach.

v) For Market risk framework, the exposure amounts considered Net open position for foreign exchange exposures.

### **Valuation of financial instruments**

Fair value estimates are generally subjective in nature, and are made as of a specific point in time based on the characteristics of the financial instruments and relevant market information. Where available, the most suitable measure for fair value is the quoted market price. In the absence of organized secondary markets for most financial instruments, and in particular for loans, deposits and unlisted derivatives, direct market prices are not available. The fair value of such instruments was therefore calculated on the basis of well-established valuation techniques using current market parameters. In particular, the fair value is a theoretical value applicable at a given reporting date, and hence can only be used as an indicator of the value realizable in a future sale.

All valuation models are validated before they are used as a basis for financial reporting, by qualified personnel independent of the area that created the model. These techniques involve uncertainties and are significantly affected by the assumptions used and judgements made regarding risk characteristics of various financial instruments, discount rates, estimates of future cash flows, future expected loss experiences and other factors. Changes in assumptions could significantly affect these estimates and the resulting fair values. Derived fair value estimates cannot necessarily be substantiated by comparison to independent markets and, in many cases, could not be realized in an immediate sale of the instruments.

The following methods and significant assumptions have been applied in determining the fair values of financial instruments presented below:

(i) the fair value of demand deposits and savings accounts with no specific maturity is assumed to be the amount payable on demand at the statement of financial position date;

(ii) the fair value of variable rate financial instruments is assumed to approximate their carrying amounts and, in the case of loans and unquoted debt securities, does not, therefore, reflect changes in their credit quality, as the impact of credit risk is recognized separately by deducting the amount of the impairment allowances from both the carrying amount and fair value;

(iii) the fair value of fixed rate loans and mortgages carried at amortized cost is estimated by comparing market interest rates when the loans were granted with current market rates offered on similar loans; and

(iv) the fair value of forward exchange contracts is estimated by discounting future cash flows. Future cash flows are estimated based on model estimates of the amount it would receive or pay to terminate the contract at the statement of financial position date taking into account current market conditions and the current creditworthiness of the counterparties. The discount rate used is a market rate for a similar instrument at the statement of financial position date. The fair value of an option contract is determined by applying the binomial valuation model. Inputs are based on market related data at the statement of financial position date.

### *Fair value hierarchy*

The level into which a fair value measurement is classified is determined with reference to the observability and significance of the inputs used in the valuation technique as follows:

Level 1 valuations: Fair value measured using only Level 1 inputs i.e. unadjusted quoted prices in active markets for identical assets or liabilities at the measurement date.

Level 2 valuations: Fair value measured using Level 2 inputs i.e. observable inputs which fail to meet Level 1, and not using significant unverified inputs and validated models. Unverified inputs are inputs for which market data are not available.

Level 3 valuations: Fair value measured using significant unverified inputs or invalidated models.

**Table PV1: Prudent valuation adjustments**

The following table provide a detailed breakdown of the constituent elements of valuation adjustment.

At 31 December, 2024:

In thousands of Hong Kong dollar		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
		Equity	Interest rates	FX	Credit	Commodities	Total	Of which: In the trading book	Of which: In the banking book
1	Close-out uncertainty, of which:	-	-	3	-	-	3	-	3
2	<i>Mid-market value</i>	-	-	3	-	-	3	-	3
3	<i>Close-out costs</i>	-	-	-	-	-	-	-	-
4	<i>Concentration</i>	-	-	-	-	-	-	-	-
5	Early termination	-	-	-	-	-	-	-	-
6	Model risk	-	-	-	-	-	-	-	-
7	Operational risks	-	-	-	-	-	-	-	-
8	Investing and funding costs	-	-	-	-	-	-	-	-
9	Unearned credit spreads	-	-	-	-	-	-	-	-
10	Future administrative costs	-	-	-	-	-	-	-	-
11	Other adjustments	-	-	-	-	-	-	-	-
12	<b>Total adjustments</b>	-	-	3	-	-	3	-	3

**Template CC1: Composition of regulatory capital**

		In thousands of Hong Kong dollar	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
	<b>CET1 capital: instruments and reserves</b>		
1	Directly issued qualifying CET1 capital instruments plus any related share premium	7,348,440	(6)
2	Retained earnings	16,650,783	(7)
3	Disclosed reserves	(44,654)	(8)+(9)
4	<i>Directly issued capital subject to phase out from CET1 capital (only applicable to non-joint stock companies)</i>	Not applicable	Not applicable
5	Minority interests arising from CET1 capital instruments issued by consolidated bank subsidiaries and held by third parties (amount allowed in CET1 capital of the consolidation group)	0	
6	<b>CET1 capital before regulatory deductions</b>	23,954,569	
	<b>CET1 capital: regulatory deductions</b>		
7	Valuation adjustments	0	
8	Goodwill (net of associated deferred tax liability)	0	
9	Other intangible assets (net of associated deferred tax liability)	9,543	(2) + (4)
10	Deferred tax assets net of deferred tax liabilities	63,492	(3) - (4)
11	Cash flow hedge reserve	0	
12	Excess of total EL amount over total eligible provisions under the IRB approach	0	
13	Credit-enhancing interest only strip, and any gain on sale and other increase in the CET1 capital arising from securitization transactions	0	
14	Gains and losses due to changes in own credit risk on fair valued liabilities	0	
15	Defined benefit pension fund net assets (net of associated deferred tax liabilities)	9,467	(5)
16	Investments in own CET1 capital instruments (if not already netted off paid-in capital on reported balance sheet)	0	
17	Reciprocal cross-holdings in CET1 capital instruments	0	
18	Insignificant LAC investments in CET1 capital instruments issued by financial sector entities that are outside the scope of regulatory consolidation (amount above 10% threshold)	0	
19	Significant LAC investments in CET1 capital instruments issued by financial sector entities that are outside the scope of regulatory consolidation (amount above 10% threshold)	0	
20	Mortgage servicing rights (net of associated deferred tax liabilities)	Not applicable	Not applicable
21	Deferred tax assets arising from temporary differences (net of associated deferred tax liabilities)	Not applicable	Not applicable
22	Amount exceeding the 15% threshold	Not applicable	Not applicable
23	of which: significant investments in the ordinary share of financial sector entities	Not applicable	Not applicable
24	of which: mortgage servicing rights	Not applicable	Not applicable
25	of which: deferred tax assets arising from temporary differences	Not applicable	Not applicable
26	National specific regulatory adjustments applied to CET1 capital	475,428	
26a	Cumulative fair value gains arising from the revaluation of land and buildings (own-use and investment properties)		
26b	Regulatory reserve for general banking risks	475,428	
26c	Securitization exposures specified in a notice given by the Monetary Authority	0	
26d	Cumulative losses below depreciated cost arising from the institution's holdings of land and buildings	0	
26e	Capital shortfall of regulated non-bank subsidiaries	0	
26f	Capital investment in a connected company which is a commercial entity (amount above 15% of the reporting institution's capital base)	0	
27	Regulatory deductions applied to CET1 capital due to insufficient AT1 capital and Tier 2 capital to cover deductions	0	
28	<b>Total regulatory deductions to CET1 capital</b>	557,930	
29	<b>CET1 capital</b>	23,396,639	
	<b>AT1 capital: instruments</b>		
30	Qualifying AT1 capital instruments plus any related share premium	0	
31	of which: classified as equity under applicable accounting standards	0	
32	of which: classified as liabilities under applicable accounting standards	0	
33	<i>Capital instruments subject to phase out arrangements from AT1 capital</i>	0	
34	AT1 capital instruments issued by consolidated bank subsidiaries and held by third parties (amount allowed in AT1 capital of the consolidation group)	0	
35	<i>of which: AT1 capital instruments issued by subsidiaries subject to phase-out arrangements</i>	0	
36	<b>AT1 capital before regulatory deductions</b>	0	
	<b>AT1 capital: regulatory deductions</b>		
37	Investments in own AT1 capital instruments	0	
38	Reciprocal cross-holdings in AT1 capital instruments	0	
39	Insignificant LAC investments in AT1 capital instruments issued by financial sector entities that are outside the scope of regulatory consolidation (amount above 10% threshold)	0	

Template CC1: Composition of regulatory capital (continued)

		In thousands of Hong Kong dollar	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
40	Significant LAC investments in AT1 capital instruments issued by financial sector entities that are outside the scope of regulatory consolidation	0	
41	National specific regulatory adjustments applied to AT1 capital	0	
42	Regulatory deductions applied to AT1 capital due to insufficient Tier 2 capital to cover deductions	0	
43	<b>Total regulatory deductions to AT1 capital</b>	0	
44	<b>AT1 capital</b>	0	
45	<b>Tier 1 capital (T1 = CET1 + AT1)</b>	23,396,639	
	<b>Tier 2 capital: instruments and provisions</b>		
46	Qualifying Tier 2 capital instruments plus any related share premium	0	
47	<i>Capital instruments subject to phase out arrangements from Tier 2 capital</i>	0	
48	Tier 2 capital instruments issued by consolidated bank subsidiaries and held by third parties (amount allowed in Tier 2 capital of the consolidation group)	0	
49	<i>of which: capital instruments issued by subsidiaries subject to phase-out arrangements</i>	0	
50	Collective impairment allowances and regulatory reserve for general banking risks eligible for inclusion in Tier 2 capital	803,890	Note (i)
51	<b>Tier 2 capital before regulatory deductions</b>	803,890	
	<b>Tier 2 capital: regulatory deductions</b>		
52	Investments in own Tier 2 capital instruments	0	
53	Reciprocal cross-holdings in Tier 2 capital instruments and non-capital LAC liabilities	0	
54	Insignificant LAC investments in Tier 2 capital instruments issued by, and non-capital LAC liabilities of, financial sector entities that are outside the scope of regulatory consolidation (amount above 10% threshold and, where applicable, 5% threshold)	0	
54a	Insignificant LAC investments in non-capital LAC liabilities of financial sector entities that are outside the scope of regulatory consolidation (amount formerly designated for the 5% threshold but no longer meets the conditions)(for institutions defined as "section 2 institution" under §2(1) of Schedule 4F to BCR only)	0	
55	Significant LAC investments in Tier 2 capital instruments issued by financial sector entities that are outside the scope of regulatory consolidation	0	
55a	Significant LAC investments in non-capital LAC liabilities of financial sector entities that are outside the scope of regulatory consolidation (net of eligible short positions)	0	
56	National specific regulatory adjustments applied to Tier 2 capital	0	
56a	Add back of cumulative fair value gains arising from the revaluation of land and buildings (own-use and investment properties) eligible for inclusion in Tier 2 capital	0	
56b	Regulatory deductions applied to Tier 2 capital to cover the required deductions falling within §48(1)(g) of BCR	0	
57	<b>Total regulatory deductions to Tier 2 capital</b>	0	
58	<b>Tier 2 capital (T2)</b>	803,890	
59	<b>Total capital (TC = T1 + T2)</b>	24,200,529	
60	<b>Total risk weighted assets</b>	88,524,972	
	<b>Capital ratios (as a percentage of risk weighted assets)</b>		
61	CET1 capital ratio	26.43%	
62	Tier 1 capital ratio	26.43%	
63	Total capital ratio	27.34%	
64	Institution-specific buffer requirement (capital conservation buffer plus countercyclical capital buffer plus higher loss absorbency requirements)	7.502%	
65	<i>of which: capital conservation buffer requirement</i>	2.500%	
66	<i>of which: bank specific countercyclical buffer requirement</i>	0.502%	
67	<i>of which: higher loss absorbency requirement</i>	0.000%	
68	CET1 (as a percentage of RWA) available after meeting minimum capital requirements	19.34%	
	<b>National minima (if different from Basel 3 minimum)</b>		
69	National CET1 minimum ratio	Not applicable	Not applicable
70	National Tier 1 minimum ratio	Not applicable	Not applicable
71	National Total capital minimum ratio	Not applicable	Not applicable
	<b>Amounts below the thresholds for deduction (before risk weighting)</b>		
72	Insignificant LAC investments in CET1, AT1 and Tier 2 capital instruments issued by, and non-capital LAC liabilities of, financial sector entities that are outside the scope of regulatory consolidation	0	
73	Significant LAC investments in CET1 capital instruments issued by financial sector entities that are outside the scope of regulatory consolidation	0	
74	Mortgage servicing rights (net of related tax liability)	Not applicable	Not applicable
75	Deferred tax assets arising from temporary differences (net of related tax liability)	Not applicable	Not applicable

**Template CC1: Composition of regulatory capital (continued)**

		In thousands of Hong Kong dollar	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
<b>Applicable caps on the inclusion of provisions in Tier 2 capital</b>			
76	Provisions eligible for inclusion in Tier 2 in respect of exposures subject to the BSC approach, or the STC approach and SEC-ERBA, SEC-SA and SEC-FBA (prior to application of cap)	0	
77	Cap on inclusion of provisions in Tier 2 under the BSC approach, or the STC approach, and SEC-ERBA, SEC-SA and SEC-FBA	0	
78	Provisions eligible for inclusion in Tier 2 in respect of exposure	0	
79	Cap for inclusion of provisions in Tier 2 under the IRB approach and SEC-IRBA	0	
<b>Capital instruments subject to phase-out arrangements</b>			
80	Current cap on CET1 capital instruments subject to phase-out arrangements	Not applicable	Not applicable
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	Not applicable	Not applicable
82	Current cap on AT1 capital instruments subject to phase-out arrangements	0	
83	Amount excluded from AT1 capital due to cap (excess over cap after redemptions and maturities)	0	
84	Current cap on Tier 2 capital instruments subject to phase-out arrangements	0	
85	Amount excluded from Tier 2 capital due to cap (excess over cap after redemptions and maturities)	0	

**Note (i):**

The amount is the sum of regulatory reserve for general banking risks and collective impairment allowances, limited to 1.25% of risk-weighted assets for credit risks under standardized approach.

Notes to the Template

Row No.	Description	Hong Kong basis	Basel III basis
	<b>Deferred tax assets net of deferred tax liabilities</b>	63,492	63,492
10	<p><b>Explanation</b></p> <p>As set out in paragraphs 69 and 87 of the Basel III text issued by the Basel Committee (December 2010), DTAs that rely on future profitability of the bank to be realized are to be deducted, whereas DTAs which relate to temporary differences may be given limited recognition in CET1 capital (and hence be excluded from deduction from CET1 capital up to the specified threshold). In Hong Kong, an AI is required to deduct all DTAs in full, irrespective of their origin, from CET1 capital. Therefore, the amount to be deducted as reported in row 10 may be greater than that required under Basel III.</p> <p>The amount reported under the column "Basel III basis" in this box represents the amount reported in row 10 (i.e. the amount reported under the "Hong Kong basis") adjusted by reducing the amount of DTAs to be deducted which relate to temporary differences to the extent not in excess of the 10% threshold set for DTAs arising from temporary differences and the aggregate 15% threshold set for MSRs, DTAs arising from temporary differences and significant investments in CET1 capital instruments issued by financial sector entities (excluding those that are loans, facilities and other credit exposures to connected companies) under Basel III.</p>		
<b>Remarks:</b> The amount of the 10% threshold mentioned above is calculated based on the amount of CET1 capital determined in accordance with the deduction methods set out in BCR Schedule 4F. The 15% threshold is referring to paragraph 88 of the Basel III text issued by the Basel Committee (December 2010) and has no effect to the Hong Kong regime.			

Template CC2: Reconciliation of regulatory capital to balance sheet

	Balance sheet as in published financial statements	Under regulatory scope of consolidation	Cross reference to Definition of Capital Components
In thousands of Hong Kong dollar	As at December 31, 2024	As at December 31, 2024	
<b>Assets</b>			
Cash and balances with banks and other financial institutions	22,055,584	3,434,463	
Placements with banks and other financial institutions	18,203,031	59,391,994	
Loans and advances			
- Loans and advances to customers	119,422,318	119,983,632	
- Loans and advances to banks	22,559,519	-	
Financial assets measured at fair value through profit or loss	66,319,181	66,237,609	
Financial assets measured at fair value through other comprehensive income	70,530,284	70,530,284	
Fixed assets	296,112	89,890	
Intangible assets	10,112	10,112	(2)
Deferred tax assets	62,923	62,923	(3)
<i>of which : deferred tax liabilities related to intangibles</i>		(569)	(4)
<i>Other assets</i>	2,069,600	2,359,220	
<i>of which: defined benefit pension fund net assets</i>		9,467	(5)
<i>Less: Impairment allowances</i>		(393,462)	
<i>of which: collective impairment allowances reflected in regulatory capital</i>		(328,462)	(1)
<b>Total Assets</b>	<b>321,528,664</b>	<b>321,706,665</b>	
<b>Liabilities</b>			
Deposits and balances from banks and other financial institutions	39,848,537	39,848,537	
Deposits from customers	252,723,987	252,901,988	
Trading financial liabilities	50,627	50,627	
Current taxation	199,214	199,214	
Other liabilities	4,751,730	4,751,730	
<b>Total Liabilities</b>	<b>297,574,095</b>	<b>297,752,096</b>	
<b>Shareholders' Equity</b>			
Share capital	7,348,440	7,348,440	
<i>of which: paid-in share capital</i>		7,348,440	(6)
Reserves	16,606,129	16,606,129	
<i>of which: retained profits</i>		16,650,783	(7)
<i>Investment revaluation reserve</i>		(35,298)	(8)
<i>capital reserves</i>		(9,356)	(9)
<b>Total Shareholders' Equity</b>	<b>23,954,569</b>	<b>23,954,569</b>	
<b>Total Liabilities and Shareholders' Equity</b>	<b>321,528,664</b>	<b>321,706,665</b>	

Table CCA: Main features of regulatory capital instruments

1	Issuer	Citibank (Hong Kong) Limited	Citibank (Hong Kong) Limited	Citibank (Hong Kong) Limited	Citibank (Hong Kong) Limited	Citibank (Hong Kong) Limited	Citibank (Hong Kong) Limited	Citibank (Hong Kong) Limited
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	NA	NA	NA	NA	NA	NA	NA
3	Governing law(s) of the instrument	Hong Kong	Hong Kong	Hong Kong	Hong Kong	Hong Kong	Hong Kong	Hong Kong
	<i>Regulatory treatment</i>							
4	Transitional Basel III rules <sup>a</sup>	NA	NA	NA	NA	NA	NA	NA
5	Post-transitional Basel III rules <sup>+</sup>	Common Equity Tier 1	Common Equity Tier 1	Common Equity Tier 1	Common Equity Tier 1	Common Equity Tier 1	Common Equity Tier 1	Common Equity Tier 1
6	Eligible at solo <sup>o</sup> /group/group & solo	Solo	Solo	Solo	Solo	Solo	Solo	Solo
7	Instrument type (types to be specified by each jurisdiction)	Ordinary shares	Ordinary shares	Ordinary shares	Ordinary shares	Ordinary shares	Ordinary shares	Ordinary shares
8	Amount recognised in regulatory capital (as of most recent reporting date)	HKD 200 (Class A)	HKD 299,800 (Class A)	HKD 170,800 (Class A)	HKD 29,200 (Class A)	HKD 50,000 (Class A)	HKD 4,450,000 (Class A)	HKD 5,000,000 (Class A)
9	Par value of instrument	NA	NA	NA	NA	NA	NA	NA
10	Accounting classification	Shareholders' equity	Shareholders' equity	Shareholders' equity	Shareholders' equity	Shareholders' equity	Shareholders' equity	Shareholders' equity
11	Original date of issuance	5 July 1965	22 July 1965	11 October 1965	30 December 1965	16 January 1967	7 April 1976	3 February 1983
12	Perpetual or dated	Perpetual	Perpetual	Perpetual	Perpetual	Perpetual	Perpetual	Perpetual
13	Original maturity date	no maturity	no maturity	no maturity	no maturity	no maturity	no maturity	no maturity
14	Issuer call subject to prior supervisory approval	No	No	No	No	No	No	No
15	Optional call date, contingent call dates and redemption amount	NA	NA	NA	NA	NA	NA	NA
16	Subsequent call dates, if applicable	NA	NA	NA	NA	NA	NA	NA
	<i>Coupons / dividends</i>							
17	Fixed or floating dividend/coupon	Floating	Floating	Floating	Floating	Floating	Floating	Floating
18	Coupon rate and any related index	NA	NA	NA	NA	NA	NA	NA
19	Existence of a dividend stopper	No	No	No	No	No	No	No
20	Fully discretionary, partially discretionary or mandatory	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary
21	Existence of step up or other incentive to redeem	No	No	No	No	No	No	No
22	Noncumulative or cumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger (s)	NA	NA	NA	NA	NA	NA	NA
25	If convertible, fully or partially	NA	NA	NA	NA	NA	NA	NA
26	If convertible, conversion rate	NA	NA	NA	NA	NA	NA	NA
27	If convertible, mandatory or optional conversion	NA	NA	NA	NA	NA	NA	NA
28	If convertible, specify instrument type convertible into	NA	NA	NA	NA	NA	NA	NA
29	If convertible, specify issuer of instrument it converts into	NA	NA	NA	NA	NA	NA	NA
30	Write-down feature	No	No	No	No	No	No	No
31	If write-down, write-down trigger(s)	NA	NA	NA	NA	NA	NA	NA
32	If write-down, full or partial	NA	NA	NA	NA	NA	NA	NA
33	If write-down, permanent or temporary	NA	NA	NA	NA	NA	NA	NA
34	If temporary write-down, description of write-up mechanism	NA	NA	NA	NA	NA	NA	NA
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	NA	NA	NA	NA	NA	NA	NA
36	Non-compliant transitioned features	No	No	No	No	No	No	No
37	If yes, specify non-compliant features	NA	NA	NA	NA	NA	NA	NA

**Footnote:**

<sup>a</sup> Regulatory treatment of capital instruments subject to transitional arrangements provided for in Schedule 4H of the Banking (Capital) Rules

<sup>+</sup> Regulatory treatment of capital instruments not subject to transitional arrangements provided for in Schedule 4H of the Banking (Capital) Rules

<sup>o</sup> Include solo-consolidated



Table CCA: Main features of regulatory capital instruments

1	Issuer	Citibank (Hong Kong) Limited	Citibank (Hong Kong) Limited	Citibank (Hong Kong) Limited	Citibank (Hong Kong) Limited	Citibank (Hong Kong) Limited	Citibank (Hong Kong) Limited
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	NA	NA	NA	NA	NA	NA
3	Governing law(s) of the instrument	Hong Kong	Hong Kong	Hong Kong	Hong Kong	Hong Kong	Hong Kong
	<i>Regulatory treatment</i>						
4	Transitional Basel III rules <sup>z</sup>	NA	NA	NA	NA	NA	NA
5	Post-transitional Basel III rules <sup>z</sup>	Common Equity Tier 1	Common Equity Tier 1	Common Equity Tier 1	Common Equity Tier 1	Common Equity Tier 1	Common Equity Tier 1
6	Eligible at solo <sup>y</sup> /group/group & solo	Solo	Solo	Solo	Solo	Solo	Solo
7	Instrument type (types to be specified by each jurisdiction)	Ordinary shares	Ordinary shares	Ordinary shares	Ordinary shares	Ordinary shares	Ordinary shares
8	Amount recognised in regulatory capital (as of most recent reporting date)	HKD 585,000,000 (Class A)	HKD 78,000,000 (Class B)	HKD 2,722,440,000 (Class A)	HKD 78,000,000 (Class A)	HKD 3,787,983,000 (Class A)	HKD 87,017,000 (Class B)
9	Par value of instrument	NA	NA	NA	NA	NA	NA
10	Accounting classification	Shareholders' equity	Shareholders' equity	Shareholders' equity	Shareholders' equity	Shareholders' equity	Shareholders' equity
11	Original date of issuance	21 May 2004	1 July 2004	13 June 2005	1 July 2005	15 December 2009	15 December 2009
12	Perpetual or dated	Perpetual	Perpetual	Perpetual	Perpetual	Perpetual	Perpetual
13	Original maturity date	no maturity	no maturity	no maturity	no maturity	no maturity	no maturity
14	Issuer call subject to prior supervisory approval	No	No	No	No	No	No
15	Optional call date, contingent call dates and redemption amount	NA	NA	NA	NA	NA	NA
16	Subsequent call dates, if applicable	NA	NA	NA	NA	NA	NA
	<i>Coupons / dividends</i>						
17	Fixed or floating dividend/coupon	Floating	Floating	Floating	Floating	Floating	Floating
18	Coupon rate and any related index	NA	NA	NA	NA	NA	NA
19	Existence of a dividend stopper	No	No	No	No	No	No
20	Fully discretionary, partially discretionary or mandatory	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary
21	Existence of step up or other incentive to redeem	No	No	No	No	No	No
22	Noncumulative or cumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger (s)	NA	NA	NA	NA	NA	NA
25	If convertible, fully or partially	NA	NA	NA	NA	NA	NA
26	If convertible, conversion rate	NA	NA	NA	NA	NA	NA
27	If convertible, mandatory or optional conversion	NA	NA	NA	NA	NA	NA
28	If convertible, specify instrument type convertible into	NA	NA	NA	NA	NA	NA
29	If convertible, specify issuer of instrument it converts into	NA	NA	NA	NA	NA	NA
30	Write-down feature	No	No	No	No	No	No
31	If write-down, write-down trigger(s)	NA	NA	NA	NA	NA	NA
32	If write-down, full or partial	NA	NA	NA	NA	NA	NA
33	If write-down, permanent or temporary	NA	NA	NA	NA	NA	NA
34	If temporary write-down, description of write-up mechanism	NA	NA	NA	NA	NA	NA
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	NA	NA	NA	NA	NA	NA
36	Non-compliant transitioned features	No	No	No	No	No	No
37	If yes, specify non-compliant features	NA	NA	NA	NA	NA	NA

**Footnote:**

<sup>z</sup> Regulatory treatment of capital instruments subject to transitional arrangements provided for in Schedule 4H of the Banking (Capital) Rules

<sup>y</sup> Regulatory treatment of capital instruments not subject to transitional arrangements provided for in Schedule 4H of the Banking (Capital) Rules

<sup>\*</sup> Include solo-consolidated

### Template CCyB1: Geographical distribution of credit exposures used in countercyclical capital buffer (“CCyB”)

The following table provides an overview of the geographical distribution of private sector credit exposures relevant for the calculation of the Company’s CCyB ratio at December 31, 2024.

		(a)	(c)	(d)	(e)
	Geographical breakdown by Jurisdiction (J)	Applicable JCCyB ratio in effect (%)	RWA used in computation of CCyB ratio (in thousands of Hong Kong dollar)	AI-specific CCyB ratio (%)	CCyB amount
1	Hong Kong SAR	0.500%	48,917,445		
2	Australia	1.000%	16,279		
3	France	1.000%	439		
4	Germany	0.750%	2,112		
5	Ireland	1.500%	234,190		
6	Luxembourg	0.500%	303,859		
7	Netherlands	2.000%	1,796		
8	South Korea	1.000%	210		
9	Sweden	2.000%	4		
10	United Kingdom	2.000%	27,932		
11	Cyprus	1.000%	7		
12	Denmark	2.500%	110		
13	Hungary	0.500%	39		
14	Sum		49,504,422		
15	Total		49,884,689	0.502%	444,362

# **Template LR1: Summary comparison of accounting assets against leverage ratio (“LR”) exposure measure**

The following table reconciles the total assets in the published financial statements of the Company to the LR exposure measure.

		(a)
	<b>Item</b>	<b>Value under LR framework (in thousands of Hong Kong dollar)</b>
1	Total consolidated assets as per published financial statements	321,528,664
2	Adjustment for investments in banking, financial, insurance or commercial entities that are consolidated for accounting purposes but outside the scope of regulatory consolidation	-
2a	Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference	-
3	Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting standard but excluded from the LR exposure measure	-
3a	Adjustments for eligible cash pooling transactions	-
4	Adjustments for derivative contracts	91,338
5	Adjustment for SFTs (i.e. repos and similar secured lending)	700,338
6	Adjustment for off-balance sheet (“OBS”) items (i.e. conversion to credit equivalent amounts of OBS exposures)	8,611,088
6a	Adjustments for prudent valuation adjustments and specific and collective provisions that are allowed to be excluded from exposure measure	(393,462)
7	Other adjustments	(17,513)
8	<b>Leverage ratio exposure measure</b>	<b>330,520,453</b>

## Template LR2: Leverage ratio (“LR”)

The following table provides a detailed breakdown of the components of the Company's LR denominator.

		(a)	(b)
		In thousands of Hong Kong dollar	
		At December 31, 2024	At September 30, 2024
<b>On-balance sheet exposures</b>			
1	On-balance sheet exposures (excluding those arising from derivative contracts and SFTs, but including collateral)	322,069,081	331,565,553
2	Less: Asset amounts deducted in determining Tier 1 capital	(557,930)	(534,774)
3	<b>Total on-balance sheet exposures (excluding derivative contracts and SFTs)</b>	<b>321,511,151</b>	<b>331,030,779</b>
<b>Exposures arising from derivative contracts</b>			
4	Replacement cost associated with all derivative contracts (where applicable net of eligible cash variation margin and/or with bilateral netting)	43,464	16,902
5	Add-on amounts for PFE associated with all derivative contracts	47,874	63,806
6	Gross-up for collateral provided in respect of derivative contracts where deducted from the balance sheet assets pursuant to the applicable accounting framework	-	-
7	Less: Deductions of receivables assets for cash variation margin provided under derivative contracts	-	-
8	Less: Exempted CCP leg of client-cleared trade exposures	-	-
9	Adjusted effective notional amount of written credit-related derivative contracts	-	-
10	Less: Adjusted effective notional offsets and add-on deductions for written credit-related derivative contracts	-	-
11	<b>Total exposures arising from derivative contracts</b>	<b>91,338</b>	<b>80,708</b>
<b>Exposures arising from SFTs</b>			
12	Gross SFT assets (with no recognition of netting), after adjusting for sale accounting transactions	700,000	500,000
13	Less: Netted amounts of cash payables and cash receivables of gross SFT assets	-	-
14	CCR exposure for SFT assets	338	249
15	Agent transaction exposures	-	-
16	<b>Total exposures arising from SFTs</b>	<b>700,338</b>	<b>500,249</b>
<b>Other off-balance sheet exposures</b>			
17	Off-balance sheet exposure at gross notional amount	84,699,046	85,312,880
18	Less: Adjustments for conversion to credit equivalent amounts	(76,087,958)	(76,686,915)
19	<b>Off-balance sheet items</b>	<b>8,611,088</b>	<b>8,625,965</b>
<b>Capital and total exposures</b>			
20	Tier 1 capital	23,396,639	26,902,926
20a	Total exposures before adjustments for specific and collective provisions	330,913,915	340,237,701
20b	Adjustments for specific and collective provisions	(393,462)	(392,658)
21	Total exposures after adjustments for specific and collective provisions	330,520,453	339,845,043
<b>Leverage ratio</b>			
22	<b>Leverage ratio</b>	<b>7.08%</b>	<b>7.92%</b>

## Table LIQA: Liquidity risk management

The Company's liquidity risk management process is integrated into the overall Citi liquidity and funding process and liquidity monitoring framework of the Group. Liquidity is managed at the Citi-level, the Citibank, N.A.-level, the Country level and the level of Material Legal Entity ("MLE").

Citigroup policy requires all MLE (which is the level at which the Company is operating at) to maintain a strong liquidity position and ensure sufficient cash flows to meet all financial commitment and to capitalize on opportunities for business expansion. This includes the Company's ability to meet deposit withdrawals either on demand or at contractual maturity, to repay borrowings as they mature, to comply with the statutory liquidity ratio, and make new loans and investments as opportunities arise. The Company maintains a pool of customer deposits, which made up of current and savings accounts and time deposits. The customer deposits are widely diversified by type and maturity and represent a stable source of funding.

### *Policies and Procedures*

The Company is managed as part of the Hong Kong Country ALCO. The ALCO Charter includes the monitoring and control of liquidity and funding. ALCO monitors trends in balance sheet and ensures that any concerns that might impact the stability of the customer deposits are addressed effectively.

It is the responsibility of the Company's management to ensure compliance with local regulatory requirements and limits set by ALCO. The Company's liquidity resources are managed by the treasurer. Liquidity is managed on a daily basis by treasury function. The Board is ultimately responsible for overseeing liquidity risk that the Company is able to take and ensure that there is a robust liquidity management process in place.

The Company's liquidity risk management framework requires limits or triggers to be set for prudent liquidity management, the major applicable liquidity metrics include:

- Net intragroup balance
- Liquidity ratios
- Deposit to loan ratio
- Daily Term Liquidity Stress Trest ("TLST")
- Monthly Local TLST
- Resolution Liquidity Adequacy and Positioning ("RLAP")

All limits and internal triggers are reviewed at least annually as part of Horizontal Liquidity Review Process and more frequently if required, to ensure that they are remain relevant to current market conditions and business strategy. These limits and triggers are reviewed and approved by ALCO on a regular basis. Any limit excess will be escalated under a delegated authority structure and reviewed by ALCO and the Board. The Company also prepares a Funding and Liquidity Plan (FLP), which contains the forecasted Balance Sheet and forecasted internal liquidity metrics (TLST and RLAP) for the year ahead which are evaluated against respective limits and internal triggers. Additionally, a Contingency Funding and Liquidity Plan ("CFP") playbook is in place for Hong Kong, on a total country basis, which lays out the trigger points and actions in the event of liquidity crisis to ensure that there is an effective response by senior management in case of such an event.

The Company's securities holdings are mainly in government securities that can be liquidated, repurchased or used as collateral in the event of liquidity stress.

### *Stress Test*

Citi uses multiple measures in monitoring its liquidity, including those described below. In addition, there continues to be numerous regulatory developments relating to future liquidity standards and requirements applicable to financial institutions such as Citi, including certain measures discussed below.

Stress testing and scenario analyzes are intended to quantify the potential impact of a liquidity event on the balance sheet (including on and off balance sheet), contingent funding obligations and other liquidity exposures, and to identify viable funding alternatives that can be utilized. These scenarios include assumptions about significant changes in key funding sources, market triggers (such as credit ratings), potential uses of funding and political and economic conditions in certain countries. These conditions include standard and stress market conditions as well as firm-specific events.

A wide range of liquidity events are considered to ascertain potential mismatches between liquidity sources and uses over a variety of time horizons by tenor buckets. Liquidity limits are set accordingly. To monitor the liquidity of the Bank, those stress tests and potential mismatches may be calculated with varying frequencies, with several important tests performed daily. All assumptions used in the stress scenarios must be reviewed under the process of "Horizontal Liquidity Review Process".

TLST - "Term Liquidity Stress Test" is the Company's primary long-term internal stress metric. The TLST scenario assumes a market and idiosyncratic backdrop against which the Company can measure its stressed liquidity needs. The scenario describes stress conditions across 365 days including the Company's customer/counterparty behaviour, its ability to access funding markets as well as any mitigating actions management can take to protect franchise. TLST is used to measure a 12-month survival, i.e. the Company must maintain sufficient liquidity to meet all maturing obligations within 12 months under the TLST stress scenario. TLST is prepared and monitored daily for all currencies including HKD, CNY and G10 currencies.

Local TLST - "Institution Specific and Local Market Scenario" represents a significant local market disruption such as a collapse of a major local bank, or an abrupt change in the regulatory or political environment, which will affect the liquidity available to that market. It requires a self-sufficiency period over a 12-month period and it is performed on a monthly basis.

Resolution Liquidity Adequacy and Positioning ("RLAP") is a short term internal stress metric used to measure the short-term (30 days) survival horizon under a Severe Market Disruption stress scenario. It is designed to ensure there are sufficient liquidity resources to withstand outflows associated with Resolution scenario with a 30-day survival period under a severely stress market condition. Assumptions are internally developed and referenced to US LCR and the RLAP is produced and monitored on a daily basis.

## Table LIQA: Liquidity risk management (Continued)

### Encumbered and unencumbered assets

An asset is defined as encumbered, from a liquidity perspective, if it has been pledged as collateral against an existing liability, and as a result is no longer available to the bank to secure funding, satisfy collateral needs or be sold to reduce the funding requirement. An asset is therefore categorized as unencumbered if it has not been pledged against an existing liability. As of December 31, 2024, High Quality Liquid Asset (HQLA) held by the bank is mostly unencumbered assets, except a small portion of Hong Kong exchange fund bills which are set aside for intraday liquidity needs.

The Company maintains a sufficient cushion of HQLA which can be sold or used as collateral to provide liquidity under stress period. The compositions of the HQLA are mainly in government securities together with a small portion of high investment grade credit securities. The size of the liquidity cushion was approximately HK\$136 billion as of December 31, 2024.

Citibank, N.A.'s credit ratings as at the end of December 31, 2024 were A+(S&P) and Aa3 (Moody's). Given that Citibank other entities are our only counterparties for these derivative transactions and cash positions are held or posted as collateral according to the mark to market of the contracts. Citibank's credit ratings downgrade has minimal impact on Bank's derivative collateral requirement.

### Analysis of assets and liabilities by remaining maturity

The following maturity profile is based on the remaining period at the statement of financial position date to the contractual maturity date.

2024	Total	Repayable on demand	1 month or less	Over 1 month to 3 months	Over 3 months to 1 year	Over 1 year to 5 years	Over 5 years	Undated or overdue
<b>Assets</b>								
Cash and balances with banks, central banks and other financial institutions	22,055,584	3,434,463	18,621,121	-	-	-	-	-
Placements with banks and other financial institutions	18,203,031	-	-	5,707,892	12,495,139	-	-	-
Loans and advances	141,981,837	7,954,866	443,827	2,695,107	14,812,498	44,741,719	71,183,056	150,764
Financial assets measured at fair value through profit or loss	66,319,181	-	41,804,627	24,366,339	52,988	-	-	95,227
Financial assets measured at fair value through other comprehensive income	70,530,284	-	16,307,781	42,106,080	8,835,632	3,280,791	-	-
Non-interest bearing assets	2,438,747	-	-	-	-	-	-	2,438,747
	<b>321,528,664</b>	<b>11,389,329</b>	<b>77,177,356</b>	<b>74,875,418</b>	<b>36,196,257</b>	<b>48,022,510</b>	<b>71,183,056</b>	<b>2,684,738</b>
<b>Liabilities</b>								
Deposits and balances from banks and other financial institutions	39,848,537	384,873	17,227,477	950,007	7,966,761	13,319,419	-	-
Deposits from customers	252,723,987	105,619,492	106,237,202	34,366,648	6,500,645	-	-	-
Trading financial liabilities	50,627	-	-	-	-	-	-	50,627
Lease liabilities	302,418	-	13,046	26,165	86,176	160,701	16,330	-
Non-interest bearing liabilities	4,648,526	-	-	-	-	-	-	4,648,526
	<b>297,574,095</b>	<b>106,004,365</b>	<b>123,477,725</b>	<b>35,342,820</b>	<b>14,553,582</b>	<b>13,480,120</b>	<b>16,330</b>	<b>4,699,153</b>
<b>Commitments</b>								
Other commitments	84,699,046	84,175,512	290,424	233,110	-	-	-	-
Forward forward deposits placed	-	-	-	-	-	-	-	-
	<b>84,699,046</b>	<b>84,175,512</b>	<b>290,424</b>	<b>233,110</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Of which:</b>								
Debt securities								
- included in financial assets measured at fair value through profit or loss	66,223,954	-	41,804,627	24,366,339	52,988	-	-	-
- included in financial assets measured at fair value through other comprehensive income	70,530,284	-	16,307,781	42,106,080	8,835,632	3,280,791	-	-
	<b>136,754,238</b>	<b>-</b>	<b>58,112,408</b>	<b>66,472,419</b>	<b>8,888,620</b>	<b>3,280,791</b>	<b>-</b>	<b>-</b>

## Table CRA: General information about credit risk

Credit risk is the risk of loss resulting from the decline in credit quality (or downgrade risk) or failure of a borrower, counterparty, third party or issuer to honor its financial or contractual obligations.

This category includes credit and counterparty risks from loans and advances and counterparty risks from trading and investing activities and also third parties to either hold, collect or settle the funds on behalf of the Company. The Company identifies and manages this risk through its (a) target market definitions, (b) credit approval process, (c) post-disbursement monitoring and (d) remedial management procedures.

Credit Risk Management is responsible for the quality and performance of credit portfolios of the Company, through which it can pursue a long-term sustainable and profitable growth. It manages, monitors and controls all credit risks within the Company through:

- formulating credit policies on new acquisition, portfolio management, collection and recovery for credit portfolios;
- developing risk acceptance criteria for portfolios towards segments, sectors, industries, usages and collateral;
- undertaking an independent review and objective assessment of credit risks;
- controlling exposures to portfolios, industries, counterparties and countries etc by setting limits;
- monitoring the performance of credit portfolios, including collateral positions, and developing effective remedial strategies;
- evaluating potentially adverse scenario that may impact the quality and performance of credit portfolios;
- establishing key risk indicators that assess the market situation on on-going basis; and
- providing advice and guidance to business units on various credit-related issues.

The Company's credit risk arises mainly from its consumer and treasury operations.

### *Consumer credit risk*

The Retail Credit Risk Policy (RCRP), along with the firm-wide Risk Rating Policy, is the foundation of Global Consumer Risk Management. The RCRP provide the rules by which credit and fraud risks are managed and authorities, exceptions and limits are defined. The ability for Independent Risk Management to successfully manage risk is complemented by a robust control framework, which includes: ongoing business monitoring; risk-based independent verification; detective mechanisms including frequent portfolio and business reviews; and a robust Risk Appetite Framework.

Active monitoring of conformance with established risk limits and tolerances occurs through a variety of Key Risk Indicators (KRIs), benchmarks, and financial measures. These include a risk tolerance limit, which requires every portfolio to obtain initial approval and annual re-approval of risk tolerances. In addition, origination benchmarks are an essential control mechanism to ensure the Company's originations are performing on a consistent basis within the risk appetite of any individual business. There are numerous monitoring systems and triggering mechanisms in place to determine if additional scrutiny or action is needed. Risk tolerance limits and the Risk Appetite Ratio are critical Key Risk Indicators which call for additional scrutiny by senior management and specific action when triggers are breached.

The Company's consumer credit policy, approval process and credit delegation authority are designed for the fact that there are high volumes of relatively homogeneous, small value transactions in each consumer loan category. Because of the nature of consumer banking, the credit policies are based primarily on statistical analyses of risks with respect to different products and types of customers. The Company has established methodologies on risk assessment for new product launch as well as periodic review of the terms of existing products, so as to achieve the desired customer profiles.

### *Credit risk for treasury transactions*

The Company's treasury activities are predominantly with group entities or with institutions and governments with strong credit standing. As such, credit risk for the Company's treasury activities is not significant.

### *Credit-related commitments*

The risks involved in credit-related commitments and contingencies are essentially the same as the credit risk involved in extending loan facilities to customers. These transactions, are therefore, subject to the same credit application, portfolio maintenance and collateral requirements as for customers applying for loans.

### *Master netting arrangements*

The Company enters into master netting arrangements with counterparties whenever possible. Netting agreements provide that, in an event of default occurs, all outstanding transactions with the counterparty will be terminated and all amounts outstanding will be settled on a net basis.

### *Concentration of credit risk*

The Company pursues a strategy of mitigating any concentration in credit risk by diversifying the asset portfolio. The total asset portfolio consists of a balanced mix of collateralized products (mortgages and margin finance), as well as credit cards and unsecured credit facilities but is concentrated in Hong Kong.

**Template CR1: Credit quality of exposures**

The following table provides an overview of credit quality of on- and off-balance exposures as at December 31, 2024.

In thousands of Hong Kong dollar		(a)	(b)	(c)	(d)	(e)	(f)	(g)
		Gross carrying amounts of		Allowances / impairments	Of which ECL accounting provisions for credit losses on exposures calculated under the STC approach exposures		Of which ECL accounting provisions for credit losses on IRB approach exposures	Net values (a+b-c)
		Defaulted exposures	Non-defaulted exposures		Allocated in regulatory category of specific provisions	Allocated in regulatory category of collective provisions		
1	Loans	93,276	142,768,918	386,302	54,851	331,451	-	142,475,892
2	Debt securities	-	136,809,008	-	-	-	-	136,809,008
3	Off-balance sheet exposures	-	749,759	-	-	-	-	749,759
4	<b>Total</b>	<b>93,276</b>	<b>280,327,685</b>	<b>386,302</b>	<b>54,851</b>	<b>331,451</b>	<b>-</b>	<b>280,034,659</b>

Loans includes Trade Bills, Placement with banks and other financial institutions with residual maturities greater than one year and Loans and advances to customers, along with the related accrued interest receivables.

Commitment includes Trade-related contingencies, Forward forward deposits placed, and Other commitments with an original maturity of not more than one year and with an original maturity of more than one year.



**Template CR2: Changes in defaulted loans and debt securities**

The following table provides information on the changes in defaulted loans and debt securities, including any changes in the amount of defaulted exposures, movements between non-defaulted and defaulted exposures, and reductions in the defaulted exposures due to write-offs as at December 31, 2024 and June 30, 2024 respectively.

In thousands of Hong Kong dollar		(a)
		Amount
1	Defaulted loans and debt securities at end of the previous reporting period	81,722
2	Loans and debt securities that have defaulted since the last reporting period	196,139
3	Returned to non-defaulted status	(5,153)
4	Amounts written off	(172,415)
5	Other changes	(7,017)
6	Defaulted loans and debt securities at end of the current reporting period	93,276

**Table CRB: Additional disclosure related to credit quality of exposures**

The following provide additional qualitative and quantitative information on the credit quality of exposures to supplement the quantitative information provided under templates CR1 and CR2 as at December 31, 2024.

**(i) Credit quality of Loans and advances to customers**

The Company classifies the loans and advances in accordance with the loan classification system required to be adopted for reporting to the HKMA.

The ageing analysis of loans and advances to customers that are past due but not impaired as follows:

	<b>As at December 31, 2024</b>
<b>In thousands of Hong Kong dollar</b>	
Gross loans and advances to customers that are past due but not impaired	
- Overdue 3 months or less	<u><u>2,027,839</u></u>

**(ii) Credit losses and impairment of assets**

The Company recognises loss allowances for expected credit loss (“ECL”) on financial assets measured at amortised cost and fair value through other comprehensive income.

The Company measures loss allowances at an amount equal to lifetime ECLs, except for the following, which are measured at 12-month ECLs:

- financial assets that are determined to have low credit risk at the reporting date; and
- other financial assets for which credit risk (i.e. the risk of default occurring over the expected life of the asset) has not increased significantly since initial recognition

The Company assumes that the credit risk on a financial asset has increased significantly if it is more than 30 days past due or material deterioration of other risk factors.

12-month ECLs are the portion of ECLs that result from default events that are possible within the 12 months after the reporting date (or a shorter period if the expected life of the instrument is less than 12 months).

Lifetime ECLs are the ECLs that result from all possible default events over the expected life of a financial instrument.

The maximum period considered when estimating ECLs is the maximum contractual period over which the Company is exposed to credit risk.

## Table CRB: Additional disclosure related to credit quality of exposures (Continued)

### (iii) Credit risk exposure by geographical areas, industry and residual maturity

<b>Geographical area</b> <b>In thousands of Hong Kong dollar</b>	<b>As at December 31, 2024</b>
Hong Kong	179,931,984
United States	81,004,825
Other	19,484,152
<b>Total</b>	<b>280,420,961</b>
<b>Industry</b> <b>In thousands of Hong Kong dollar</b>	<b>As at December 31, 2024</b>
Banks	22,630,218
Official sector	136,809,008
Non-bank private sector	
- Individual	119,079,548
- Other	1,902,187
<b>Total</b>	<b>280,420,961</b>
<b>Residual maturity</b> <b>In thousands of Hong Kong dollar</b>	<b>As at December 31, 2024</b>
Repayable on demand and Up to 1 year	160,338,025
Over 1 year to 5 years	48,417,746
Over 5 years	71,513,942
Undated or overdue	151,248
<b>Total</b>	<b>280,420,961</b>

### (iv) Overdue loans and advances to customers

<b>In thousands of Hong Kong dollar</b>	<b>As at December 31, 2024</b>
Loans and advances to customers which have been overdue for periods of:	
- 6 months or less but over 3 months	55,689
- 1 year or less but over 6 months	-
- over 1 year	-
	<b>55,689</b>
Current market value of collateral held against the covered portion of overdue loans and advances to customers	-
Covered portion of overdue loans and advances to customers	-
Uncovered portion of overdue loans and advances to customers	55,689
	<b>55,689</b>
Specific impairment	48,042

## Table CRB: Additional disclosure related to credit quality of exposures (Continued)

### (iv) *Overdue loans and advances to customers (Continued)*

The covered portion of overdue loans and advances to customers represents the amount of collateral held against outstanding balances. Where collateral values are greater than gross loans and advances, only the amount of collateral up to the gross loans and advance was included.

The collateral held in respect of the overdue loans and advances mainly consists of properties.

After taking into account the transfer of risk, there were no exposures to a single country outside Hong Kong exceeding 10% of the aggregate overdue loans and advances to customers as at the above respective reporting dates.

### (v) *Rescheduled loans and advances to customers*

In thousands of Hong Kong dollar	As at December 31, 2024
Rescheduled loans and advances to customers	21,868

Rescheduled loans and advances are those loans and advances which have been restructured or renegotiated because of a deterioration in the financial position of the borrower, or because of the inability of the borrower to meet the original repayment schedule. Rescheduled loans and advances to customers are stated net of any loans and advances which have subsequently become overdue for over three months and which are included in overdue loans and advances to customers in (iv) above.

### (vi) *Impaired loans and advances to customers*

In thousands of Hong Kong dollar	As at December 31, 2024
Overdue loans and advances to customers	55,689
Rescheduled loans and advances to customers	21,868
Impaired loans and advances to customers	77,557

After taking into account the transfer of risk, there were no exposures to a single country outside Hong Kong exceeding 10% of the aggregate impaired loans and advances to customers as at the above respective reporting dates. There were also no exposures to a non-individual exceeding 10% of the aggregate impaired loans and advances to customers as at the above respective reporting dates.

## **Table CRC: Qualitative disclosures related to credit risk mitigation**

Under the Banking (Capital) Rules, recognized netting is defined as any netting done pursuant to a valid bilateral netting arrangement. Consistent with the Banking (Capital) Rules, the Company only includes valid bilateral netting arrangements in the calculation of credit risk mitigation for capital adequacy purpose.

For all facilities except instalment mortgages, non-revolving loan supported by recognized guarantee and margin finance not hitting the required conditions, it is the Company's policy that they should be reviewed at least on an annual basis, with the collateral (if any) being revalued during the review. Where facilities have been overdue and are tangibly secured, the collateral must be revalued at a minimum of once every month.

For mortgages, valuation on the mortgaged property must be updated at a minimum of once every year through the consistent use of real estate price indices. When the market is subject to significant changes in conditions, valuation should be updated more frequently. For accounts past due over 120 days, an updated valuation through a panel surveyor on the mortgaged property is required. An updated valuation must be obtained on an annual basis or earlier if there is a reason to believe that the value of the mortgaged property has declined.

For Global Margin Lending, all collateral are subject to daily mark-to-market revaluation (excluding Saturday, Sunday and other Hong Kong Public holidays); and margin calls must be initiated if the equity position has deteriorated to the margin trigger level. The frequency of revaluation may be intensified under the volatile market scenario.

The main types of recognized collateral taken by the Company includes cash on deposit, real estate properties, Equity shares, units or shares in collective investment schemes, Exchange traded funds, Life Insurance Policies and various recognized debt securities.

The credit and market risks concentrations within the recognized collateral and guarantees used by the Company are considered to be immaterial.

### Template CR3: Overview of recognized credit risk mitigation

The following table presents the extent of credit risk exposures covered by different types of recognized CRM as at December 31, 2024.

In thousands of Hong Kong dollar		(a)	(b1)	(b)	(d)	(f)
		Exposures unsecured: carrying amount	Exposures to be secured	Exposures secured by recognized collateral	Exposures secured by recognized guarantees	Exposures secured by recognized credit derivative contracts
1	Loans	122,843,418	19,632,474	10,839,870	8,792,604	-
2	Debt securities	136,809,008	-	-	-	-
3	<b>Total</b>	<b>259,652,426</b>	<b>19,632,474</b>	<b>10,839,870</b>	<b>8,792,604</b>	<b>-</b>
4	Of which defaulted	65,396	-	-	-	-

**Table CRD: Qualitative disclosures on use of ECAI ratings under STC approach**

Credit ratings from Moody's Investors Service and Standard & Poor's Ratings Services are used for the exposures of Sovereign, Public sector entity ("PSE"), Multilateral development bank, Bank, Securities firm, Corporate and Collective investment scheme ("CIS"). The Company follows the process prescribed in Part 4 of the Banking (Capital) Rules to map the ratings to the exposures booked in the Company's banking book.

**Template CR4: Credit risk exposures and effects of recognized credit risk mitigation – for STC approach**

The following table illustrates the effect of any recognized CRM (including recognized collateral under both comprehensive and simple approaches) on the calculation of capital requirements under the STC approach as at December 31, 2024.

In thousands of Hong Kong dollar		(a)	(b)	(c)	(d)	(e)	(f)
		Exposures pre-CCF and pre-CRM		Exposures post-CCF and post-CRM		RWA and RWA density	
	Exposure classes	On-balance sheet amount	Off-balance sheet amount	On-balance sheet amount	Off-balance sheet amount	RWA	RWA density
1	Sovereign exposures	137,931,246	-	137,931,246	-	-	0%
2	PSE exposures	-	-	8,792,604	-	1,758,521	20%
2a	Of which: domestic PSEs	-	-	8,792,604	-	1,758,521	20%
2b	Of which: foreign PSEs	-	-	-	-	-	0%
3	Multilateral development bank exposures	-	-	-	-	-	0%
4	Bank exposures	61,440,539	-	61,440,539	-	24,979,206	41%
5	Securities firm exposures	-	-	-	-	-	0%
6	Corporate exposures	-	-	-	-	-	0%
7	CIS exposures	-	-	-	-	-	0%
8	Cash items	581,276	-	581,276	-	2,694	0%
9	Exposures in respect of failed delivery on transactions entered into on a basis other than a delivery-versus-payment basis	-	-	-	-	-	0%
10	Regulatory retail exposures	25,535,173	82,954,114	19,121,968	-	14,341,476	75%
11	Residential mortgage loans	88,423,340	749,758	79,630,735	216,159	32,487,629	41%
12	Other exposures which are not past due exposures	7,422,037	995,174	2,988,754	-	2,988,754	100%
13	Past due exposures	44,553	-	44,553	-	66,830	150%
14	Significant exposures to commercial entities	-	-	-	-	-	0%
15	<b>Total</b>	<b>321,378,164</b>	<b>84,699,046</b>	<b>310,531,675</b>	<b>216,159</b>	<b>76,625,110</b>	<b>25%</b>

**Template CR5: Credit risk exposures by asset classes and by risk weights – for STC approach**

The following table presents a breakdown of credit risk exposures under the STC approach by asset classes and by risk weights as at December 31, 2024.

In thousands of Hong Kong dollar		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(ha)	(i)	(j)
Exposure Class	Risk Weight	0%	10%	20%	35%	50%	75%	100%	150%	250%	Others	Total credit risk exposures amount (post CCF and post CRM)
1	Sovereign exposures	137,931,246	-	-	-	-	-	-	-	-	-	137,931,246
2	PSE exposures	-	-	8,792,604	-	-	-	-	-	-	-	8,792,604
2a	Of which: domestic PSEs	-	-	8,792,604	-	-	-	-	-	-	-	8,792,604
2b	Of which: foreign PSEs	-	-	-	-	-	-	-	-	-	-	-
3	Multilateral development bank exposures	-	-	-	-	-	-	-	-	-	-	-
4	Bank exposures	-	-	19,136,879	-	42,303,660	-	-	-	-	-	61,440,539
5	Securities firm exposures	-	-	-	-	-	-	-	-	-	-	-
6	Corporate exposures	-	-	-	-	-	-	-	-	-	-	-
7	CIS exposures	-	-	-	-	-	-	-	-	-	-	-
8	Cash items	571,255	-	9,159	-	-	-	862	-	-	-	581,276
9	Exposures in respect of failed delivery on transactions entered into on a basis other than a delivery-versus-payment basis	-	-	-	-	-	-	-	-	-	-	-
10	Regulatory retail exposures	-	-	-	-	-	19,121,968	-	-	-	-	19,121,968
11	Residential mortgage loans	-	-	-	72,573,331	-	746,402	6,527,161	-	-	-	79,846,894
12	Other exposures which are not past due exposures	-	-	-	-	-	-	2,988,754	-	-	-	2,988,754
13	Past due exposures	-	-	-	-	-	-	-	44,553	-	-	44,553
14	Significant exposures to commercial entities	-	-	-	-	-	-	-	-	-	-	-
15	<b>Total</b>	<b>138,502,501</b>	<b>-</b>	<b>27,938,642</b>	<b>72,573,331</b>	<b>42,303,660</b>	<b>19,868,370</b>	<b>9,516,777</b>	<b>44,553</b>	<b>-</b>	<b>-</b>	<b>310,747,834</b>



**Table CCRA: Qualitative disclosures related to counterparty credit risk  
(including those arising from clearing through CCPs)**

The Company engages in over-the-counter (OTC) derivative transactions that may result in counterparty credit risk. The OTC derivative transactions include (1) embedded derivatives of hybrid (combined) deposits to customers and (2) stand-alone derivatives.

*Embedded derivatives of hybrid (combined) deposits*

Positioned as a single product, a hybrid (combined) deposit to customers generally consists of two components: an embedded derivative and a host cash deposit. The host cash deposit serves as a collateral over the terms of the transaction that fully mitigates the counterparty credit risks associated with the embedded derivative.

*Stand-alone derivatives transactions*

The Company participates in stand-alone derivative transactions predominately for managing its own exposures as part of its asset and liability management process. The derivative activities of this type are with group entities.

No internal capital for counterparty are considered necessary for the fully mitigated transactions and transactions with group entities.

Citibank, N.A.'s credit ratings as at the end of December 31, 2024 were A+(S&P) and Aa3(Moody's). Given that Citibank other entities are our only counterparties for these derivative transactions and cash positions are held or posted as collateral according to the mark to market of the contracts. Citibank's credit ratings downgrade has minimal impact on Bank's derivative collateral requirement.

### Template CCR1: Analysis of counterparty default risk exposures (other than those to CCPs) by approaches

The following table presents a comprehensive breakdown of default risk exposures (other than those to CCPs), RWAs, and, where applicable, main parameters under the approaches used to calculate default risk exposures in respect of derivative contracts and SFTs as at December 31, 2024.

In thousands of Hong Kong dollar		(a)	(b)	(c)	(d)	(e)	(f)
		Replacement cost (RC)	PFE	Effective EPE	Alpha ( $\alpha$ ) used for computing default risk exposure	Default risk exposure after CRM	RWA
1	SA-CCR (for derivative contracts)	31,046	22,450		1.4	74,895	16,024
1a	CEM	-	-		1.4	-	-
2	IMM (CCR) approach			-	-	-	-
3	Simple Approach (for SFTs)					-	-
4	Comprehensive Approach (for SFTs)					338	-
5	VaR (for SFTs)					-	-
6	<b>Total</b>						<b>16,024</b>

## Template CCR2: CVA capital charge

The following table provide information on portfolio subject to the CVA capital charge and the CVA calculations based on standardized CVA method and advanced CVA method as at December 31, 2024.

In thousands of Hong Kong dollar		(a)	(b)
		EAD post CRM	RWA
	Netting sets for which CVA capital charge is calculated by the advanced CVA method	-	-
1	(i) VaR (after application of multiplication factor if applicable)		-
2	(ii) Stressed VaR (after application of multiplication factor if applicable)		-
3	Netting sets for which CVA capital charge is calculated by the standardized CVA method	74,894	15,113
4	<b>Total</b>	<b>74,894</b>	<b>15,113</b>

**Template CCR3: Counterparty default risk exposures (other than those to CCPs) by asset classes and by risk weights – for STC approach**

The following table presents a breakdown of default risk exposures, other than those to CCPs, in respect of derivative contracts and SFTs that are subject to the STC approach, by asset classes and risk-weights (the latter representing the riskiness attributed to the exposure according to the respective approaches), irrespective of the approach used to determine the amount of default risk exposures as at December 31, 2024.

In thousands of Hong Kong dollar		(a)	(b)	(c)	(ca)	(d)	(e)	(f)	(g)	(ga)	(h)	(i)
Exposure Class	Risk Weight	0%	10%	20%	35%	50%	75%	100%	150%	250%	Others	Total default risk exposure after CRM
1	Sovereign exposures	338	-	-	-	-	-	-	-	-	-	338
2	PSE exposures	-	-	-	-	-	-	-	-	-	-	-
2a	Of which: domestic PSEs	-	-	-	-	-	-	-	-	-	-	-
2b	Of which: foreign PSEs	-	-	-	-	-	-	-	-	-	-	-
3	Multilateral development bank exposures	-	-	-	-	-	-	-	-	-	-	-
4	Bank exposures	-	-	71,411	-	3,484	-	-	-	-	-	74,895
5	Securities firm exposures	-	-	-	-	-	-	-	-	-	-	-
6	Corporate exposures	-	-	-	-	-	-	-	-	-	-	-
7	CIS exposures	-	-	-	-	-	-	-	-	-	-	-
8	Regulatory retail exposures	-	-	-	-	-	-	-	-	-	-	-
9	Residential mortgage loans	-	-	-	-	-	-	-	-	-	-	-
10	Other exposures which are not past due exposures	-	-	-	-	-	-	-	-	-	-	-
11	Significant exposures to commercial entities	-	-	-	-	-	-	-	-	-	-	-
12	<b>Total</b>	<b>338</b>	<b>-</b>	<b>71,411</b>	<b>-</b>	<b>3,484</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>75,233</b>

**Template CCR5: Composition of collateral for counterparty default risk exposures  
(including those for contracts or transactions cleared through CCPs)**

The following table presents a breakdown of all types of collateral posted or recognized collateral received to support or reduce the exposures to counterparty default risk exposures as at December 31, 2024 in respect of derivative contracts or SFTs entered into, including contracts or transactions cleared through a CCP:

	(a)	(b)	(c)	(d)	(e)	(f)
	Derivative contracts				SFTs	
	Fair value of recognized collateral received		Fair value of posted collateral		Fair value of recognized collateral received	Fair value of posted collateral
	Segregated	Unsegregated	Segregated	Unsegregated		
<b>In thousands of Hong Kong dollar</b>						
Cash - domestic currency	-	374,563	-	-	700,000	-
Cash - other currencies	-	3,866,696	-	-	-	-
Debt securities	-	-	-	-	-	700,338
Equity securities	-	-	-	-	-	-
Other collateral	-	-	-	-	-	-
<b>Total</b>	-	<b>4,241,259</b>	-	-	<b>700,000</b>	<b>700,338</b>

**Table SECA: Qualitative disclosures related to securitization exposures**

Aa at December 31, 2024, there were no securitization exposures as an investor in and re-securitization exposures in both banking book and trading book.

**Template SEC1: Securitization exposures in banking book**

The following table presents a breakdown of securitization exposures in the banking book (regardless of whether the exposures arising from securitization transactions satisfy all the requirements under Schedule 9 or 10 of the BCR) as at December 31, 2024.

		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
		Acting as originator (excluding sponsor)			Acting as sponsor			Acting as investor		
In thousands of Hong Kong dollar		Traditional	Synthetic	Sub-total	Traditional	Synthetic	Sub-total	Traditional	Synthetic	Sub-total
1	<b>Retail (total) – of which:</b>	-	-	-	-	-	-	-	-	-
2	residential mortgage	-	-	-	-	-	-	-	-	-
3	credit card	-	-	-	-	-	-	-	-	-
4	other retail exposures	-	-	-	-	-	-	-	-	-
5	re-securitization exposures	-	-	-	-	-	-	-	-	-
6	<b>Wholesale (total) – of which:</b>	-	-	-	-	-	-	-	-	-
7	loans to corporates	-	-	-	-	-	-	-	-	-
8	commercial mortgage	-	-	-	-	-	-	-	-	-
9	lease and receivables	-	-	-	-	-	-	-	-	-
10	other wholesale	-	-	-	-	-	-	-	-	-
11	re-securitization exposures	-	-	-	-	-	-	-	-	-

**Template SEC4: Securitization exposures in banking book and associated capital requirements – where AI acts as investor**

The following table presents securitization exposures in the banking book where an AI acts as an investing institution of securitization transactions and the associated capital requirements as at December 31, 2024.

		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	(p)	(q)
		Exposure values (by RW bands)					Exposure values (by regulatory approach)				RWAs (by regulatory approach)				Capital charges after cap			
		≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW	SEC-SA	SEC-IRBA	SEC-ERBA (incl IAA)	SEC-FBA	SEC-SA	SEC-IRBA	SEC-ERBA (incl IAA)	SEC-FBA	SEC-SA	SEC-IRBA	SEC-ERBA (incl IAA)	SEC-FBA
In thousands of Hong Kong dollar																		
1	Total exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2	Traditional securitization	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Of which securitization	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Of which retail	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Of which wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Of which re-securitization	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Of which senior	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Of which non-senior	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Synthetic securitization	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Of which securitization	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Of which retail	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Of which wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Of which re-securitization	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Of which senior	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Of which non-senior	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-



## **Table MRA: Qualitative disclosures related to market risk**

Market risk arises on all market risk sensitive financial instruments, including securities, foreign exchange contracts, etc. The objective of market risk management is to avoid excessive exposure of earnings and equity to loss and to manage the Company's exposure to the price volatility inherent in financial instruments.

The Treasury Department manages interest rate risks within the limits approved by the Market Risk Management and/or Asset and Liability Management Committee (ALCO), and these risks are monitored and reported by an independent Reporting unit. It also reviews and sets limits package as well as permitted product list, ensuring adherence to risk management objectives. These are governed by Citi Mark to Market Policy and Non-Trading Market Risk Management Policy.

Derivative instruments are used to manage the Company's own exposures to market risk as part of its asset and liability management process. The principal derivative instruments used by the Company are foreign exchange rate related contracts, which are primarily over-the-counter derivatives.

Derivative instruments shall be reflected in the trading systems which feed to Risk system. Market Risk Reporting Unit prepares risk reports for exposure usage monitoring against the approved limits. Reporting Unit sends the report to the business, market risk management for limit monitoring purpose. Once there are limit excesses, it will be communicated between business and Market Risk Management on the resolution plan and timeline and trace of resolution. The models and parameters in the systems are regularly updated and assessed as defined in the Citi policies.

The Company sets various positions and sensitivity limit structures. Additionally, the Company applies quantitative techniques and simulation models to identify and assess the potential net interest income and market value effects of these interest rate positions in different interest rate scenarios. The primary objective of such interest rate risk management is to limit the potential adverse effect of interest rate movements on net interest income. The Market Risk Manager monitors interest rate risks against set limits on a daily basis. All exceptions are reviewed and approved by the appropriate level of Market Risk Management.

### Template MR1: Market risk under Standardized (market risk) approach (STM approach)

The following table provide components of market risk capital requirement calculated using Standardized (market risk) approach (STM approach) as at December 31, 2024.

		(a)
In thousands of Hong Kong dollar		RWA
	Outright product exposures	
1	Interest rate exposures (general and specific risk)	-
2	Equity exposures (general and specific risk)	-
3	Foreign exchange (including gold) exposures	37,550
4	Commodity exposures	-
	Option exposures	
5	Simplified approach	-
6	Delta-plus approach	-
7	Other approach	-
8	Securitization exposures	-
9	<b>Total</b>	<b>37,550</b>

**Table IRRBBA: Interest rate risk in banking book – risk management objectives and policies**

Interest Rate Risk in the Banking Book (“IRRBB”) pertains to the risk to the Company's financial condition resulting from adverse movements in interest rates that affect the Company's capital and earnings. The Company’s principal measures of risk to economic value of equity (“EVE”) and net interest income (“NII”) are defined based on the standardized framework described in the Supervisory Policy Manual module IR-1 “Interest Rate Risk in the Banking Book” and in accordance with the method used in the Return on Interest Rate Risk in the Banking Book (MA(BS)12A).

IRRBB is managed by Treasury within the limits that are set and monitored by the Company’s independent risk management team, Asset and Liability Committee (ALCO) and the Board. The Company has an established IRRBB limit framework for identified risk factors that clearly defines approved risk profiles and aligns with the Company's risk appetite. In order to manage IRRBB effectively, the Company may take hedging actions or restructure existing positions to reduce IRRBB. The Company regularly assesses viability of these actions and other strategies, including further strengthening its capital position, and implement such strategies when deemed prudent, ensuring the Company operates well within established limits.

IRRBB regulatory reporting and monitoring is done on a quarterly basis. IRRBB measures from this return, including any hedging strategies or actions to reduce IRRBB, are presented to the ALCO and the Board. In addition to and in accordance with global firm-specific standards, IRRBB based on internal methodologies and assumptions is monitored on a monthly basis. While the Company uses internally defined standard interest rate shocks and scenario assumptions for internal risk reports, rate models and other assumptions that relate to interest rate risk sensitivity are consistent between internal monitoring and regulatory reporting. These models and assumptions are reviewed and validated on an annual basis, at the minimum, and where applicable, are governed by an established Model Risk Management Policy.

The Company employs additional measurements of vulnerability to loss, including stress testing based on the six standardized interest rate shocks defined by the HKMA and internally selected scenarios that reflect plausible balance sheet and risk changes as observed in the past as well as based on hypothetical or forward-looking assumptions. Potential impact from these changes is considered when reviewing policy, setting limits as well as assessing capital adequacy.

In calculating change in NII, the Company assumes that businesses and/or the Treasury make no additional changes in balances or positioning in response to the unanticipated rate changes. A static balance sheet is maintained throughout the 12 month forecast horizon, remaining constant in terms of size and product mix regardless of the interest rate scenario with maturing instruments being replaced with ones of the same original tenor and repricing terms. No prepayment and early redemption assumptions are considered for loans and time deposits as risk from these options have been assessed as immaterial and impact is curbed by the penalty fee structure in place. Optionality risks in existing as well as new products are assessed and reviewed on a regular basis, and when it is believed to be material, are incorporated into the IRRBB measurements.

Other key assumptions incorporated by the Company with respect to the HKMA reporting requirements are as follows:

For cash flow profiling, the Company adopts a methodology of including commercial margins and other spread components; and

Major currency positions reported are determined based on the criteria defined by HKMA. Currencies identified as significant for the current annual reporting date at 31st December 2024 are HKD, USD and AUD. IRR Economic Value Sensitivities do not include any netting across currencies. All favorable exposures (gains) are excluded and adverse exposures (losses) are reported.

**Quantitative Disclosure**

Non-maturity deposits ("NMD") repricing risk is modeled according to modeled rate and balance forecasts that incorporate assumptions on customer behavior and the impact of pricing decisions. Both the rate and balance models, reviewed on an annual basis, at the minimum, are determined using historical data spanning different rate cycles. Other factors that may present uncertainty in runoff rates and future deposits balances are also considered.

Given multi rate sensitivity assumptions applied in the six interest rate shock scenarios, the average repricing maturity assigned to NMDs will be different. Below table provides the average (notional-weighted maturity) and the longest repricing maturity in parallel up interest rate shock scenario.

(in years)	Repricing maturity assigned to NMDs
Average (notional-weighted maturity)	0.2
Longest	0.4

## Template IRRBB1: Quantitative information on interest rate risk in banking book

This table provides information on the change in economic value of equity (“EVE”) and change in net interest income (“NII”) over next 12 months under each of the prescribed interest rate shock scenario in respect of the Company’s interest rate exposures arising from banking book positions. The Company’s variations in earnings based on the standardized framework described in the Supervisory Policy Manual module IR-1 “Interest Rate Risk in the Banking Book” and the Return on Interest Rate Risk in the Banking Book (MA(BS)12A) for the current annual reporting date at 31st December 2024, and comparative figures versus prior year are as follows:

In million of Hong Kong dollar		change in EVE		Change in NII	
	Period	31 <sup>st</sup> December 2024	31st December 2023	31st December 2024	31st December 2023
1	Parallel up	1,851	591	-559	-356
2	Parallel down	252	1,385	410	283
3	Steepener	327	0		
4	Flattener	1,531	447		
5	Short rate up	2,032	317		
6	Short rate down	293	283		
7	Maximum	2,032	1,385	410	283
	Period	31 <sup>st</sup> December 2024		31 <sup>st</sup> December 2023	
8	Tier 1 capital	23,397		24,638	

Based on the above reported figures, the maximum EVE decline will occur in short rate up interest rate shock scenario, which would lead to a 8.68% Maximum EVE vs Tier 1 Capital ratio in 2024, a 3.06% increase from 5.62% reported in 2023.

In million of Hong Kong dollar		Maximum EVE		
	Period	31 <sup>st</sup> December 2024	31 <sup>st</sup> December 2023	YoY Change
1	Maximum	2,032	1,385	
2	Tier 1 capital	23,397	24,638	
3	Maximum EVE vs Tier 1 Capital	8.68%	5.62%	3.06%

## **Table REMA: Remuneration policy**

Information hereby provided are in accordance with the Section 3 of the Guideline on Sound Remuneration System (CG-5), under the Supervisory Policy Manual (SPM) issued by the Hong Kong Monetary Authority (HKMA).

### *Governance Structure of the Remuneration System*

Citibank (Hong Kong) Limited (CHKL) is part of the Citigroup incorporated in the United States. The majority of its compensation framework and practices is driven by the global policy originated from the New York corporate office. As part of a global organization, Citi Hong Kong follows the global policies, programs, directions and guidelines where it is applicable to the local context. In formulating the Hong Kong Remuneration Principles, references are made from the respective global policies, standards and procedures with local regulatory governance / practices considered.

The Compensation, Performance Management and Culture Committee (CPC) has been delegated Board authority to oversee compensation matters for Citi and its subsidiaries and affiliates. The CPC is responsible for determining the compensation of the CEO and approving the compensation of other executive officers and members of Citi's Operating Committee. The CPC is also responsible for approving the incentive compensation structure for members of senior management and certain highly compensated employees.

The CPC annually reviews and discusses the compensation commentary and analysis required in the Citi's Proxy Statement with management, and if appropriate, recommends to the Board. Additionally, the CPC reviews and approves the overall goals of Citi's material incentive compensation programs, including the Citi's Compensation Philosophy. The CPC also provides oversight for Citi's incentive compensation programs so that they both (i) appropriately balance risk and financial results in a manner that does not encourage employees to expose Citi to imprudent risks, and (ii) are consistent with the bank's safety and soundness.

The CPC meets periodically with Citi's senior risk officers to discuss the risk attributes of Citi's incentive compensation programs. The CPC has the power to hire and fire independent compensation consultants, legal counsel, financial or other advisors as it may deem necessary to assist it in the performance of its duties and responsibilities.

Locally, the Nomination and Remuneration Committee (NRC) of CHKL, reporting to the Board of CHKL, is responsible for overseeing senior management's implementation of the remuneration system applying to CHKL to ensure compliance with the applicable regulatory requirements and assessing whether the CHKL's overall remuneration principles are in line with its risk appetite, risk culture and long-term interests.

### *Hong Kong Remuneration Principles*

The Hong Kong Remuneration Principles (Principles) is based on Citi's compensation philosophy and has been established as the general guiding principles on remuneration, including the identification of the specific categories of employees and their definitions. The Principles also cover specific restrictions and limitations on the use of different compensation tools and sets out the regular monitoring approaches to ensure full compliance to the Principles, including an annual self-assessment performed by KPMG, an external independent party, a semi-annual internal monitoring process, and Citi's internal audit review which is scheduled from time to time.

The definitions for the following categories of employees which are in accordance with the Guideline on a Sound Remuneration System (CG-5) issued by the HKMA are set out in the Principles:

#### *Senior Management*

Individual employees who are responsible for oversight of CHKL firm-wide strategy or activities, or who oversee a major material business line in CHKL. The Chief Executive (CE), Alternate Chief Executives, Executive Directors and members of the Management Committee reporting directly to the CE and Heads of Control Function (Finance, Independent Compliance Risk Management, Internal Audit and Risk Management), will be classified as Senior Management.

## **Table REMA: Remuneration policy (Continued)**

### *Key Personnel*

Individual employees whose duties or activities in the course of their employment involve the assumption of material risk or the taking of material exposures on behalf of CHKL that could materially impact on CHKL capital sufficiency level. Under the current legal entity as regulated by the HKMA, the members of Management Committee who is not identified as Senior Management as mentioned above, Treasury and Operational Risk Heads, will be classified as Key Personnel.

The Principles were reviewed and approved by the CEO and Banking Head of Hong Kong and Macau, and the Board and/or NRC of CHKL on its remuneration matters, which consists of all Independent Non-Executive Directors. The current version of the Principles was last updated in July 2024 and was duly approved by the above parties. The next annual review has been scheduled for Q2 2025.

### *Compensation Objectives and Philosophy*

Our compensation objectives, as outlined below, have been developed and approved by the CPC, in consultation with management, the CPC's independent consultants and Citi's senior risk officers. They have been specifically created to encourage prudent risk-taking and management of controls while attracting the world-class talent necessary to our success. Our Compensation Philosophy is summarized in the following five objectives:

- Reinforce a business culture based on the highest ethical standards
- Manage our risks by encouraging prudent decision-making
- Reflect regulatory guidance in compensation programs
- Attract and retain the best talent to lead us to success
- Align compensation programs, structures, and decisions with stockholder and other stakeholder interests

Our full Compensation Philosophy statement is available on our public website.

### *Key Design Characteristics of the Remuneration System*

Citi's compensation structure consists of a fixed remuneration component and a variable remuneration component. The fixed remuneration refers to the individual annual salary, and any other cash allowances where applicable. They are determined at a level that is necessary to allow Citi to compete for talent from the market and to retain them. The variable remuneration refers to the year-end discretionary incentive bonus and any variable incentive compensation plan awards. The variable remuneration is structured to encourage behaviors that support Citi's long-term objectives and business strategies. It is designed in a way not to encourage excessive risk-taking that would jeopardize Citi's risk tolerance and long-term financial soundness, while balancing the needs to attract and retain talent with the relevant skills, knowledge and expertise to discharge their specific functions. The mix between fixed and variable remuneration depends on the importance of the employee's role within the organization. In general, highly compensated employees will receive a greater percentage of their total annual compensation as variable remuneration. When implementing remuneration programs, Citi considers the risks associated with such programs, which in general would be the risk of encouraging excessive risk-taking behavior that would ultimately impact on Citi's performance and reputation.

## Table REMA: Remuneration policy (Continued)

### *Performance Measurement, Risk Adjustment, and the Linkage between Pay and Performance*

When measuring the company performance, apart from general financial goals, costs and capitals, Citi also puts emphasis on client, culture, risk and control and compliance. Control measurements include internal audit assessment, public ratings obtained, including the CAMEL rating and the HKMA supervisory rating. Compliance measurements include the assessment on the implementation of compliance related policies in ensuring the business or function are capable to identify, assess, monitor, control and report the related compliance issue. It also includes the assessment on the success of setting an appropriate culture of compliance via the communication of the importance of all compliance related controls throughout the organization.

In evaluating an individual performance, both financial and non-financial factors are considered as part of the performance assessment process. The award of variable remuneration will depend on the fulfillment of their individual performance goals as agreed with their next level management, both financial and non-financial. Overall performance of an individual is assessed as an integral part of their performance measurement and will be appropriately reflected in the variable remuneration awarded to them.

The Leadership Principles represent the qualities, behaviors and expectations we all must exhibit to deliver on our mission of enabling economic growth and progress and to create a culture that drives client excellence, controls excellence and operational excellence. The Leadership Principles are comprised of three core principles and 12 behavioral statements. The core principles are as follows:

- We Take Ownership. We challenge one another to a higher standard in everything we do.
  - o Greets change with optimism, curiosity and resilience.
  - o Speaks up with candor and welcomes challenge from others.
  - o Learns from experiences, adapts and improves.
  - o Prioritizes the greater good when contributing to and honoring group decisions.
- We Deliver with Pride. We strive for client excellence, controls excellence and operational excellence.
  - o Simplifies, standardizes and clarifies work.
  - o Holds self and others accountable for managing risk with appropriate controls.
  - o Creates long-term value by fixing root causes.
  - o Takes pride in always doing the right thing.
- We Succeed Together. We value and learn from different perspectives to surpass stakeholder expectations.
  - o Breaks down barriers to deliver the best of Citi.
  - o Measures performance through the lens of our stakeholders.
  - o Invests in colleagues from all backgrounds.
  - o Shows empathy for colleagues, clients and communities.

## **Table REMA: Remuneration policy (Continued)**

These principles have been designed to be accessible to all colleagues by using human and tangible language. They have been simplified in line with the vision for the firm and are readily actionable.

For employees working within Control Function roles, variable remuneration is not directly linked to the financial performance of Citi's businesses and is entirely based on the employee's pre-defined performance goals. The amount of variable remuneration awarded to any control function employee is in line with the employee's role in his or her control function and his or her satisfaction of pre-defined performance goals. Moreover, the variable remuneration pool allocations are directly allocated from Citi's corporate Control Function group without any influence by the local management. The remuneration decisions on individual Control Function employees are also conducted directly within the Control Function group chain of command without any influence by the local business management.

In the scenario when the company performance is weak, the variable remuneration pool as allocated from Citi's corporate office will be reduced in line with the weak performance. Individual's variable remuneration would have to be reviewed and decided within this reduced pool. In that event employees with higher performance rating may be receiving a less reduced variable remuneration whereas employees with lower performance rating may receive a larger reduction in their variable remuneration. For employees who are classified as covered employees according to the criteria as set out by Citi's corporate office, may have the vesting of deferred variable remuneration reduced according to a pre-defined vesting condition that takes into consideration Citi's overall performance.

### *Deferral policy and vesting criteria, and the parameters used for allocating cash versus other forms of remuneration*

The variable remuneration awarded to highly compensated employees will be deferred under the Citi Discretionary Incentive and Retention Award Plan (DIRA). Generally, deferred variable remuneration awarded under the DIRA is granted in the form of an equity award that vests in four equal annual installments. The payment or distribution of deferred variable remuneration requires that the employees satisfy pre-defined vesting conditions. The pre-defined vesting conditions generally require that an employee remains actively employed by Citi over the vesting period applicable to the award. In addition, if deferred variable remuneration is awarded in the form of equity, the amount realized will depend upon the per-share price of Citi's common stock over an applicable vesting period, thereby linking the Citi's overall performance as reflected in its share price.

In some cases where an individual is identified as a covered employee, the deferral will be subject to a Material Adverse Outcomes (MAO) Settlement Condition which could result in a reduction of the deferred variable remuneration.

Generally, any unvested deferred variable remuneration is subject to clawback / forfeiture in the case of an employee's voluntary resignation; or upon involuntary termination on account of gross misconduct; or if it is found that the award is based on materially inaccurate publicly reported financial statements; or employees knowingly engaged in providing materially inaccurate information relating to publicly reported financial statements; or employees materially violated any risk limits established or revised by senior management and/or risk management.



**Template REM1: Remuneration awarded during financial year/ Template REM2: Special payments/Template REM3: Deferred remuneration**

**Aggregated Quantitative Information on Remuneration for the Senior Management and Key Personnel** <sup>(note 1)</sup>

Amount in thousands of Hong Kong dollar

a) Amounts of remuneration awarded for the financial year, split into fixed and variable remuneration (further split into cash & shares), and number of beneficiaries:

Citibank (Hong Kong) Limited <sup>(note 2)</sup>	Total Fixed Remuneration including benefit cost <sup>(note 3)</sup>	Variable Remuneration (awarded as immediate cash)	Deferred Variable Remuneration (awarded in the form of shares to be vested in next 4 years)	Deferred Variable Remuneration (awarded in the form of deferred cash to be vested in next 4 years subject to financial performance of the designated reference business)	Number of Beneficiaries <sup>(note 4)</sup>  (number of person)
2023	41,010	26,436	11,060	NIL	21
2024	41,656	22,507	9,686	NIL	23

b) Special payments (Guaranteed bonus, Sign-on awards and Severance payments) awarded/made in the financial year <sup>(note 2)</sup>.

Citibank (Hong Kong) Limited	Guaranteed bonus	Number of Beneficiaries <sup>(note 4)</sup> (number of person)	Sign-on awards	Number of Beneficiaries <sup>(note 4)</sup> (number of person)	Severance payments	Number of Beneficiaries <sup>(note 4)</sup> (number of person)
2023	NIL	NIL	NIL	NIL	1,032	1
2024	NIL	NIL	NIL	NIL	NIL	NIL

c) Unvested deferred remuneration as at end of 31 December of the respective year <sup>(note 2)</sup>:

	Unvested Equity - Value as of 31 December	Unvested Defer Cash - Value as of 31 December
2023	18,021	3,791
2024	31,819	645

d) Deferred remuneration vested and payout during the respective year <sup>(note 2)</sup>:

	Vested Equity - Value as of the Vesting Dates	Vested Defer Cash - Value as of the Vesting Dates
2023	2,603	3,630
2024	4,677	2,815

e) Total amount of unvested deferred remuneration subject to ex post explicit and / or implicit adjustments:

All unvested deferred remuneration as reported in item (c) above are all subject to ex post explicit and / or implicit adjustments. Deferred remuneration granted in form of Equity is subject to ex post implicit adjustment due to the fluctuation of the Citi stock as traded in the NYSE. For covered employees, the number of stock units is also exposed to a pre-defined vesting condition that could result in a reduction. For all employees, any gross misconduct will also lead to a forfeiture of the unvested deferred remuneration.

f) Deferred variable remuneration reduced due to ex post explicit adjustment:

2023: Nil

2024: Nil

g) Deferred variable remuneration reduced due to ex post implicit adjustment <sup>(note 5)</sup>:

Citibank (Hong Kong) Limited	ex post implicit adjustment
2023	2,182
2024	8,401

h) Number of meetings held by the CPC in New York <sup>(note 6)</sup>:

2023: 19 times

2024: 22 times

Note:

1. Data of Executive Directors, Non-Executive Directors, Senior Management and Key Personnel are reported in aggregate to preserve confidentiality of individual compensation information due to the small number of individuals identified as Key Personnel.

2. The above classifications are based on the AIs that run the business of which the Executive Directors, Non-Executive Directors, Senior Management and Key Personnel are responsible.

3. The above disclosure included benefits cost or valuation of the cost, if applicable, that the company paid, including but not limited to the medical and life insurance benefits, retirement benefits, mortgage subsidies, housing assistance and long service award if any.

4. Number of Beneficiaries represents individuals who received remuneration during their employment assignment in a capacity of Executive Director, Non-Executive Director, Senior Management or Key Personnel, and the period could be a full year or a partial year due to people movement and turnover. For example, if an individual worked the first half year and then replaced by another individual who worked in the same capacity for the remaining half year, the number of beneficiaries will be counted as two while the remuneration disclosed will be the sum of each for their respective period.

5. Deferred variable remuneration reduced during the year due to ex post implicit adjustment was calculated as: total units of unvested equity reported X (equity price at end of the year – equity price at end of previous year). A negative value will be reported as the amount of reduction due to ex post implicit adjustments during the year, whereas a positive value reflects an increase in value during the year.

6. Number of meetings held by the Compensation, Performance Management and Culture Committee in New York included some conducted in the format of conference calls and email approvals.