Citi's ICRM Anti-Bribery & Corruption Program

Gifts & Entertainment, Employment, Deals, New Activities, Third Parties, Charitable Contributions, Lobbying, Political Contributions

Inputs

Identify
Due Diligence / Pre-Approval

Measure & Monitor
Monitoring / Controls Oversight

Report
Bribery Risk

Feeback Loop

Governance & Organization; Compliance Risk, Ethics and Conduct Risk; Processes & Activities; Resources & Capabilities

Policy

- AB&C Policy
- Standards and Procedures
- Training and Awareness

Processes

- Governance and Oversight
- Risk Assessment
- Regulatory Change
- Third Party Rish Assessment
- Gifts & Entertainment
- Hiring Practices
- New Activity Reviews
- Issue Management
- Reporting

Personnel

- Three Lines of Defense
- Roles & Responsibilities
- Subject Matter Expertise
- ICRM AB&C
- AB&C Legal
- AB&C Technology

Controls

- Manager's Control Assessment
- Monitoring and Independent Assurance
- Internal Audit

Program Objectives

- Maintain a framework that provides reasonable assurance and facilitates enterprise wide compliance with applicable U.S. a.nd Non U.S. AB&C legal and regulatory requirements in alignment with the Compliance Risk Management Framework.
- Monitor and foster awareness of AB&C laws and regulations, assess the related bribery risk exposure, oversee the quality of AB&C control processes, and set global policies, standards and processes to identify, measure, monitor, and manage bribery risk.

Bribery Risk Taxonomy

- Level 0 - Compliance Risk
- Level 1 - Bribery Risk
- Level 2
  - Receipt of Anything of Value Risk
  - Provision to Government OfficiaJs Risk
  - Provision to Commercial Persons Risk

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