

## EMEA Cash Equities Disclosures

(Updated September 2020)

Citigroup Global Markets Limited (“CGML”) and Citigroup Global Markets Europe AG (“CGME”) (together with their affiliates, “Citi”, the “Firm”, “we” or “us”) are global financial services firms that operate as brokers, dealers and market makers in equities markets. Citi is dedicated to adhering to applicable laws and regulations in our dealings with our clients in those markets. This document is intended to clarify aspects of the trading relationship between Citi and our clients (each, the “Client” or “you”) in equities markets.

CGML and CGME offer execution services in equities securities in Europe, the Middle East and Africa (EMEA), and through its affiliates in North America (NAM), Latin America (LATAM) and Asia-Pacific (APAC).

The information being described relates to CGML and CGME trading equities securities as of June 30, 2019, and is subject to change without notice and prior to the circulation of any update. It is always recommended that you contact your usual Citi sales representative or [eesales@citi.com](mailto:eesales@citi.com) for additional information.

The disclosures set forth in this document apply to the institutional equities business of CGML and CGME, and to their clients that fall within the regulatory definition of “Institution”; these disclosures are not intended for, nor may they be relied upon by, individual retail investors. These disclosures are subject to (and, to the extent of any conflict, shall be governed by): (i) any written agreement with you or other written terms of business or other disclosures (including published policies) we have provided to you; and (ii) any applicable law or regulation (including, but not limited to, any applicable requirements regarding best execution or conflicts of interest). Laws and regulations in various jurisdictions may provide rights or obligations other than those discussed in this document.

You should review this document in connection with other applicable Citi agreements, terms of business and disclosures in order to fully understand your relationship with us in the context of a particular transaction. The Firm may execute an order received from you as principal or agent (executed by Citi on an exchange or otherwise as agent for its Clients), or partly as principal and partly as agent. In the case of transactions executed on an agency basis, the Firm will be acting solely as agent for the purpose of execution and not otherwise as an agent, fiduciary, financial advisor or in any similar capacity on your behalf, and the disclosures set out in this document will also apply to the extent relevant, except for those set out in the section under the heading **“Principal Trading”**.

Any statements we make to a Client in either context should not be construed as recommendations or advice or that Citi has acted as the Client’s advisor. In addition, when we transact with our Clients, we rely upon the apparent authority of the employees, representatives, advisers and agents who communicate with us on their behalf, and we assume no obligation to independently verify that authority.

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<b>(1) Principal Trading</b>	<p>When we execute a client order as principal we do so, on an arm's length basis, for our own account. In such capacity, Citi (including its sales and trading personnel) does not act as a broker, agent, fiduciary, advisor or in any similar capacity on behalf of its Client, and Citi does not undertake the duties that an entity acting in that capacity would ordinarily perform.</p> <p>When we are acting in a principal trading capacity, we may look for market opportunities that both satisfy the terms of a Client's order and allow us to make an appropriate return on the transaction with the Client, including while executing other transactions to satisfy our own, competing trading interests and responding to competing orders from other Clients. As such, except to the extent that we have agreed to different terms of execution with a Client, we will exercise our reasonable discretion in entering into a transaction with a Client based upon its order, including with respect to fill quantity, execution time, prioritization and whether to hedge or enter into such transaction electronically, manually, on aggregated basis with other orders or using internal or external sources of liquidity.</p> <p>We make markets in equity securities. We also act as an Authorized Participant in the creation and redemption of exchange-traded products (ETPs). As a market maker, we may have a number of positions and execute against the competing orders of multiple Clients, as well as trading to satisfy our own interests. As a result, we may trade with others prior to or alongside hedging or executing a particular Client's order.</p> <p>Subject to and where allowed by applicable law, we may hedge any transaction. This activity may take into account both the information that you provide when asking us to quote for a transaction and any information held regarding your previous trading activity. Following the receipt of an order or an indication of interest likely to result in a Client transaction, we may, in our reasonable discretion, engage in hedging as we determine appropriate to manage risks that we assume in connection with such transaction or to inform the pricing of such transaction. We also exercise reasonable discretion in deciding how, when and where to hedge, which may take into account both internal and external sources of liquidity. Our hedging, and other market-making activities can affect: market levels; the prices we offer to a Client or at which execution occurs; the availability of liquidity at levels necessary to execute Client orders; the level at which a benchmark or reference market rate is set; and whether prices change in a manner that accelerates, triggers, or delays or prevents the triggering of, stop-loss orders, barriers, knock-outs, knock-ins or similar order conditions. While it is not intended that such hedging activity will cause any material detrimental effect to you, such activity may have an impact upon the prices you obtain when we trade with you or when you trade with other firms. This activity may be entered into at any time after you ask us to provide a quote for a transaction. In conducting our hedging, positioning and other market-making activities, we endeavor to employ means reasonably designed to avoid undue market impact, and in all cases we endeavor to comply with applicable law.</p>
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<b>(1) Principal Trading</b>	<p>In some cases, we do not disclose information regarding such activities to our Clients on an order- or transaction-specific basis, but we require our personnel to be truthful if they agree to provide such information. We also are under no obligation to pass on to a Client profits derived from those activities.</p> <p>When determining prices at which we will trade as principal, we may take into account factors such as: product type; the market in which the transaction would occur; the type of order; the size and direction of the transaction; other pricing information; and internal costs. We may also take into account Client-specific and transaction-specific factors such as: the volume, types, size, frequency or speed of trading the Client executes with Citi and in the market; the potential market impact of the Client's trading activity with Citi and in the market; the Client's credit quality and Citi's credit exposure to the Client; specific terms of the transaction or governing documentation; and the extent and nature of the Client's business relationship(s) with Citi. Local legal or regulatory requirements may also be determinative. Some of these factors might operate to a Client's disadvantage and may delay or prevent the execution against the order or increase the slippage or difference between any specified price trigger for the order and the actual execution price.</p> <p>The relevant impact of each individual factor on the price of a transaction will differ depending upon the specific circumstances of that transaction. As a result, and always subject to applicable legal and regulatory requirements, we may quote different prices to different Clients or at different times for the same or substantially similar type of transaction.</p> <p>We generally do not disclose the amount of revenue we earn or expect to earn from a transaction or the components of our "all-in" price, but we require our personnel to be truthful if they agree to provide such information.</p> <p>Where we provide quotes when acting as principal, we may, subject to applicable law: decide the transaction size or sizes of such quotes; update or withdraw such quotes at any time; execute orders at a better price than set out in such quotes; execute orders at a different price than such quotes in respect of transactions where execution in several securities is part of one transaction or in respect of orders that are subject to conditions other than market price. In addition, where we receive an order of a size bigger than our quotation size, we may decide to execute that part of the order which exceeds our quotation size at the quoted price, or at a different price; where we provide such quotes in different sizes and receive an order between those sizes, we may decide to execute the order at one of the quoted prices, or at a different price. Further, we may limit both the number of transactions that we undertake to enter into with a client pursuant to any quote and the total number of transactions that we undertake to enter into with different clients pursuant to any quote. Lastly, we may make any other modifications to our quotes as we determine in our sole discretion are necessary or desirable.</p>
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<b>(1) Principal Trading</b>	<p>When you enter into Equities transactions with us, it will be on the basis that you have read and understood these terms of business. If you have questions after reading this document, please contact a senior Citi representative. This document is also available at <a href="https://www.citibank.com/icg/global_markets/docs/Terms-of-Business-for-Professional-Clients-and-Eligible-Counterparties.pdf">https://www.citibank.com/icg/global_markets/docs/Terms-of-Business-for-Professional-Clients-and-Eligible-Counterparties.pdf</a> and may be updated from time to time.</p>
<b>(2) IOIs</b>	<p>Communication with Clients about trading axes and client flow is a constant activity in which our Global Sales and Trading team engage. We communicate about such trading activity using a wide variety of medium, including phone, Bloomberg (either via chat or the terminal), Symphony chat, e-mail and, at times, face to face. For the above communication methods (and any other non-FIX, non -systematized, communication means) Citi, consistent with industry practice, does not use AFME qualifiers when communicating IOIs using these means. We do adhere to the AFME Framework and use AFME qualifiers as described below, for all system generated and fix communicated IOIs. That being said, all of our client communications concerning trading axes and client flow follow the common regulatory guidance that our communication is truthful, accurate and not misleading (FINRA 09-28).</p> <p>Citi’s indications of interest (“IOIs”) may be communicated through Citi’s proprietary order management system or a third-party vendor system. These IOIs may be actionable or non-actionable (in whole or part). These IOIs may also be either “natural” or “non-natural”, and may either represent client or house/principal interest. IOIs may be targeted/customized to the recipient or disseminated publicly.</p> <p>In designating IOIs as “natural” or “non-natural”, and “client” or “house”, Citi generally follows the AFME/IA Framework for Indications of Interest (<a href="https://www.afme.eu/globalassets/downloads/divisions/equities/afme-egt-framework-for-indications-of-interest.pdf">https://www.afme.eu/globalassets/downloads/divisions/equities/afme-egt-framework-for-indications-of-interest.pdf</a>). This disclosure clarifies Citi’s use of those IOI designations where the Framework is ambiguous:</p> <ul style="list-style-type: none"><li>• Citi may use either a C:1 – Client Natural (Block) IOI or C:2 – Client Natural (Working) IOI to represent a customer order, whether or not working in the market, so long as the order has been received by Citi. Citi’s IOIs are intended to reflect our existing orders; however, if a situation changes while we have an IOI outstanding, it is possible that any IOI may no longer reflect an existing order at any moment in time.</li><li>• When Citi transmits an H:1 – House Position Unwind IOI, Citi does not intend to immediately replace that position; and when Citi transmits an H:2 – House Position Wanted IOI, Citi is engaging in sourcing liquidity and does not intend to immediately unwind the resulting position. However, under certain circumstances (including, but not limited to, changing market conditions, changes to its risk appetite, post trade bilateral agreement with the client or client mark outs), Citi, may in either case (H:1 or H:2) not fill published size</li></ul>

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<b>(2) IOIs</b>	<p>or trade out of or replace the traded position acquired in response to these IOIs without giving prior notice to the client. Positions may include cash equities and/or derivatives.</p> <ul style="list-style-type: none"><li>• Citi may use the P:1 – Potential IOI when Citi has a reasonable expectation that it has a client interest. Please note that, consistent with the Framework, at the time of display, P:1 IOIs do not necessarily represent a customer order that Citi has received, and no assurance can be given that the potential interest will result in a trade until Citi has had a conversation with both the buyer and the seller.</li></ul> <p>A client tiering arrangement is used to facilitate dissemination of IOIs.</p> <p>If you have questions regarding our IOI practices, please contact your Citi representative.</p>
<b>(3) Citi Internal Liquidity</b>	<p><u>What are the internal sources of liquidity Citi has access to?</u></p> <p>In our capacity as a Systematic Internaliser, Citi now provides two distinct sources of internal liquidity: (1) CitiMatch (Citi’s Contra Principal Liquidity); and (2) Citi Central Risk Principal Quotes via Liquidity Hub.</p> <p>When trading against these internal sources of liquidity, Citi makes available the relevant associated MIC codes for both venues:</p> <ul style="list-style-type: none"><li>∅ CGMU – CGML MIC code for CitiMatch</li><li>∅ CGMC – CGML MIC code for Liquidity Hub</li><li>• CGEE - CGME MIC Code for Citimatch</li><li>• CGEC - CGME MIC Code for Liquidity Hub</li></ul> <p><b>CitiMatch</b> provides access to Citi’s Contra Principal Liquidity which reflects flow from derivatives hedging (Swap and related trading) and trading activity generated by Citi’s risk desk and executed via Citi algorithms. Citi’s algorithms and SOR logic will drive the way we access liquidity across internal and external venues based of specific routing factors. In our liquidity waterfall, unless clients have opted out of CitiMatch, all client orders will pass through CitiMatch before they reach the SOR. This is performed in accordance with Citi Securities Services Execution Policy (the “Best Execution Policy”).</p>

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<b>(3) Citi Internal Liquidity</b>	<p><b>Liquidity Hub (LH)</b> is an internal source of Citi principal liquidity, available as a Systematic Internaliser for Electronic Execution (EE) orders. Please refer to Citi’s Central Risk Disclosure for further details.</p> <p><u>What other sources of principal liquidity and workflows are classified as SI activity?</u></p> <p>Citi also offers other sources of principal liquidity and workflows which are classified within its SI activity. This encompasses execution via Actionable Indication of Interest (AIOI) via our Total Touch platform and manual interactions via the high touch desks. These various sources of liquidity are not formally categorised and no specific MIC code will be attached to the corresponding execution.</p>
<b>(4) Central Risk</b>	<p>Citi’s Central Risk Desk (“Central Risk” or “CR”) uses an automated trading platform that manages a portfolio of principal positions of Citi’s Equities Division. CR’s task is to optimize Citi’s risk portfolio utilizing a variety of hedging products and engaging in securities trades with customers and the markets. CR provides the following details to clients who may be interested in executing with CR under our Direct Client Access program (“DCA”) or via Liquidity Hub (“LH”). Orders filled by CR will be denoted as principal capacity executions on trade confirmations. Please feel free to contact your Citi representative if you have questions we have not addressed below.</p> <p>Citi offers three distinct interactions with its principal liquidity in CR. Clients may opt in or out of each type of interaction with CR. Note that the availability of each individual interaction may vary based on region and market, so please contact your Citi coverage for more detail.</p> <ul style="list-style-type: none"><li>• <u>Anonymous Smart Order Router (“SOR”) Child Level Interaction with CR</u> – per our execution venue analysis practices, LH will only see order flow in accordance with our policies and procedures relating to routing and execution of customer orders (“Citi’s Order Execution Policies”). No client identification or parent order information will be available to LH or CR.</li><li>• <u>Parent Algo Order Interaction with CR</u> – client identification and parent order information are passed to LH. CR will receive explicit execution details, including quantity, price and client identification.</li><li>• <u>Directly to CR via DCA</u> – client identification and parent order information are passed to CR, along with execution details such as quantity and price.</li></ul>

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<b>(4) Central Risk</b>	<p>LH is an internal source of Citi principal liquidity (available as a Systematic Internaliser in Europe) for Electronic Execution (“EE”) orders and high-touch orders submitted to EE by Citi Equities trading personnel. When LH interacts with liquidity, it does so with an information barrier in place that protects client confidential information from passing outside EE, except where the client has opted-in for parent order visibility (second bullet above). LH analyzes the firm’s central risk management desk’s portfolio and, alongside this and other factors, determines its risk appetite. This appetite is made available to Citi’s algorithms. The SOR routes orders in accordance with our execution venue analysis practices and LH will see order flow if it is competitive and in accordance with Citi’s Order Execution Policies.</p> <p>After being onboarded to DCA, a client may access DCA by sending immediate-or-cancel (“IOC”) orders directly to CR, explicitly designating CR as the order routing destination. At the order entry stage, the presence of the client’s order and the identity of the client are not known to CR trading personnel. If CR executes a client directed order, CR trading personnel will then become aware of the client’s identity. The CR trading personnel will not be informed of any specific order details from attempts a client may have made to trade a security directed to CR that did not result in an execution on trade date.</p> <p>Citi trading personnel will analyze the historical trades CR effects via DCA and LH. This information will be used to configure the CR system to optimize the client’s experience.</p> <p>Markets Quantitative Analytics (“MQA”) analysts support the Citi Global Equities business in general and have access to principal and client orders and execution information across the Equities Division. In the context of the CR business, these analysts may be requested to analyze orders that failed to execute in their attempt to determine the reason that LH declined the trade, in order to increase the interaction rate for DCA by providing aggregated results from such analyses to the CR business.</p> <p>See “<b>Quantitative Analysts</b>”, “<b>Data Management</b>”, “<b>Confidentiality / Privacy</b>” and “<b>Conflicts of Interest</b>” sections for additional information.</p>
<b>(5) Citi External Liquidity</b>	<p><u>What are the external sources of liquidity you connect to?</u></p> <p>Citi sources liquidity across EMEA regulated markets (Primary Exchanges &amp; Multilateral Trading Facilities - MTFs) and Systematic Internalisers. Please see <a href="#">Appendix B</a> for a list of those venues currently available via our cash equities electronic execution platform in EMEA. We access liquidity across displayed and non-displayed venues to ensure we source as much as liquidity as possible to optimize client execution. We also leverage from periodic auctions and conditional / Large In Scale venues as they offer meaningful liquidity.</p>

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<b>(5) Citi External Liquidity</b>	<p><u>Can clients opt out of any external venues (incl. non-displayed liquidity sources and SIs)?</u> Yes, clients have the ability to opt out of any external venues if they wish to do so. If not specified otherwise, routing will be implemented at Citi's discretion across the standard venues we currently access, see below.</p> <p><u>How does Citi interact with external venues?</u> The type of liquidity sources an order will access is determined by the underlying trading strategies selected by our clients (DMA or Algorithms) and their specific configurations and/or instructions. The interaction with displayed venues is done through Citi's Smart Order Routing (SOR) which will route orders to the most appropriate venues of execution based on Citi's Best Execution Policy and any client customisation. Our SOR has access to lit books in primary and MTF venues as well as periodic auction books and Systematic Internalisers.</p> <p>The order routing logic to source additional non-displayed liquidity is managed within our algorithmic engine CitiSmart. Routing to non-displayed venues will aim to capture opportunistic liquidity to enhance overall execution and minimise trading footprint. We will source liquidity in MTF non-displayed books, conditional / LIS venues as well as periodic auctions.</p> <p><u>How does Citi address Min fills size with external venues?</u> Orders will be subject to Minimum Execution Size (MES) parameters to further protect client flow. Citi gives clients the ability to customize this specific parameter to optimize their overall execution. The MES can be specified as notional amount, multiple of average trade size, or multiple lot. The set-up is configurable by venue and by client.</p> <p><u>Does Citi aggregate orders to fulfil minimum quantity?</u> No, Citi does not aggregate separate client orders to fulfil minimum fill requirements. Citi may, however, access venues that aggregate orders to fulfil Minimum Execution Size. Clients can choose to opt-out from executing on those venues that aggregate orders; however, it is not possible for clients to opt-out of the aggregation functionality applied by the relevant venues where this behavior is mandated by the venue.</p> <p><u>How does Citi monitor external venue reversion?</u> We monitor venue reversion over multiple time horizons including short term (milliseconds), medium term (minutes) and for SIs we also look at long term durations (multi day mark-out). We also monitor hit and fill rates across venues as well as quote and fill sizes. Regarding SIs, we score and rank them according to our SI methodology framework taking into account short-term reversion, liquidity and</p>
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<b>(5) Citi External Liquidity</b>	<p>toxicity. Details on framework are available upon request.</p> <p>Data and ranking on external venues is reviewed monthly by our liquidity governance committee chaired by Execution advisory and Head of Electronic Execution.</p> <p><u>What information barriers does Citi have with external SIs?</u></p> <p>When interacting with external SIs, Citi does so with an information barrier in place that protects confidential information. Trading is done anonymously within Citi's electronic execution set up and client identifying details are not included in order details sent to external SIs.</p>
<b>(6) Order Handling / Routing</b>	<p><u>What is the main objective when handling or routing a client's Order?</u></p> <p>Citi's main objective in handling and routing Client orders is to obtain the best execution outcome for a Client, taking into account price, costs, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of an order. In order to ensure quality execution, Citi Electronic Execution will leverage access to multiple internal and external sources of liquidity from primary exchanges, MTFs to Systematic Internalisers across both displayed and non-displayed books. Routing will be done across all Citi's default venues unless otherwise specified by clients. Please see Appendix B to view CGML/CGME's EMEA Electronic Execution External Liquidity Venues.</p> <p><u>Citi's Smart Order Router</u></p> <p>Citi uses a proprietary Smart Order Router that has been developed in-house by Citi for internal and client originated trade execution.</p> <p><u>How does Citi's SOR work?</u></p> <p>Citi's algorithms and SOR logic will drive the way we access liquidity across internal and external venues based of specific routing factors. In our liquidity waterfall, unless clients have opted out of CitiMatch, all client orders will pass through CitiMatch before they reach the SOR. This is performed in accordance with the Best Execution Policy.</p> <p>Please refer to Citi's Markets and Banking Execution Policy: <a href="https://www.citibank.com/icg/global_markets/docs/Citi-Markets-and-Banking-Execution-Policy.pdf">https://www.citibank.com/icg/global_markets/docs/Citi-Markets-and-Banking-Execution-Policy.pdf</a></p> <p><u>How does Citi interact with Displayed Liquidity?</u></p> <p><u>Liquidity Taking</u></p>

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### (6) Order Handling / Routing

If the order is marketable, the SOR will take liquidity from the lit order book including internal and external Systematic Internalisers using IOC orders. We look to capture the best price and quote available while minimising the number of fills. Child orders to multiple venues are routed simultaneously however where there is a significant relative difference in latency, order routing is staggered such that they arrive at the respective venues at around the same time.

#### Liquidity Adding

If an order is not marketable the SOR will place the order in the lit book at one or more venues. Our SOR aims to obtain an optimal order placement strategy while maximizing the probability of execution and reducing execution cost. We typically look at various parameters such as queue depth, trade size and frequency, historical market share and order cancellation rates. The placement strategy is revisited in real time as volume goes through the market.

#### How does Citi interact with non-displayed liquidity?

The order routing logic to source additional non-displayed liquidity is built into our algorithmic offering and helps us minimise execution footprint. When posting, allocation to non-displayed venues is derived from the underlying algorithms used by our clients and parameters associated with the selected strategies. The opportunistic non-displayed liquidity overlay tends typically to be a function of the “I Would If I Could” parameter selected by clients.

The allocation to non-displayed liquidity destinations will be driven by client preference and orders will be allocated across a set of optimal venues to maximise likelihood of execution (subject to prevailing market liquidity). We aim to maximise execution quality while sourcing additional liquidity.

We will also route orders to conditional venues if the size of the parent orders meets trading thresholds. This allows Citi to access significant liquidity for our clients while minimising market impact.

When executing orders in non-displayed liquidity destinations, we are able to adjust our allocation to such destinations based on liquidity shift. We typically look at fill rates across venues to redirect some of our order flow to venues where we see increased liquidity.

#### How does Citi manage Sweeping Behavior?

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<b>(6) Order Handling / Routing</b>	<p>When the algorithm decides to cross the spread to get executed, Citi will look to source liquidity in CitiMatch before routing to the market to source additional liquidity and minimise execution footprint. We will then route any residual orders to the market. Citi will use the dark lit sweep order type in venues supporting such functionality to source additional dark liquidity looking to improve on far touch execution when possible.</p> <p><u>How does Citi's SOR interact with SIs quotes?</u> All quotes, including SIs', are published to Citi's algorithms and Smart Order Router (SOR). The SOR routes orders in accordance with the algorithm's Smart Venue Management logic and any SI will get order flow if it is competitive and in accordance with our order execution policy.</p> <p><u>Is Parent order information passed to venues?</u> No parent order information is passed through to venues. Client identifying information details are not included in order details sent to external venues.</p> <p><u>What Market Data Feeds does Citi use?</u> Citi uses direct Market Data feeds from major EMEA Market Venues to monitor and respond to market movements. For other Market Venues Citi may use third party services where their effectiveness can be proven. The monitoring of Market Venue feeds includes changes in order book depth which affects client execution potential. Citi uses monitoring tools to ensure that any potential latency of market data does not cause issues with trade activity.</p> <p><u>What anti-gaming logic does Citi employ?</u> Citi's market interaction is directed towards minimizing the impact of Citi's trading activity within the market. Citi's algorithms employ anti-gaming logic including but not limited to the use of minimum fill quantities, dynamic fair value calculation, order randomisation techniques and venue tiering. In terms of latency, we use latency measurements to calibrate order routing from the SOR. The latency is measured as the time it takes for Citi to send an IOC order to the venue and receive an acknowledgement back. Where child orders are being sent to multiple venues, orders are routed simultaneously. However where there is a significant relative difference in latency, order routing is staggered so that they</p>
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<b>(6) Order Handling / Routing</b>	<p>arrive at the respective venues at around the same time. This allows us to better protect client flow and minimise adverse selection. Where it is relevant, our trading strategies will also use our Fair-Value Protection logic to safeguard client flow against price spikes. The Fair-Value Protection calculation is based on a trailing VWAP which takes into account all Lit trades but excludes Citi’s trades to obtain a true view of market levels. The look-back period for trailing VWAP is stock specific and takes into account liquidity characteristics of the stocks traded. Orders will also be subject to Minimum Execution Size (MES) parameters to further protect client flow when executing in non-displayed venues and conditional / LIS venues. We give clients the ability to customise this specific parameter to optimise their overall order execution. We also monitor venue toxicity across lit, non-displayed and SI venues. We monitor toxicity over multiple time horizons including short term (milliseconds), medium term (minutes) and long term durations (multi day mark-out). We score and rank SI venues according to our toxicity methodology framework to ensure we route orders to the most appropriate SI venues and have the right level of protection for client flow.</p> <p><u>Does Citi pass back MIC Codes?</u></p> <p>Citi provides SI specific MIC codes in Tag 30 of the message passed back to client. Clients will have full transparency of where their orders have been executed.</p> <p><u>Does Citi pass back Liquidity tags?</u></p> <p>Citi configures, on a client basis, the tags 29, 30 and 851 for each child order executed and provides this to the client for liquidity management.</p>
<b>(7) Best Execution</b>	<p>Please refer to Citi’s Markets and Banking Execution policy located here: <a href="https://www.citibank.com/icg/global_markets/docs/Citi-Markets-and-Banking-Execution-Policy.pdf">https://www.citibank.com/icg/global_markets/docs/Citi-Markets-and-Banking-Execution-Policy.pdf</a></p> <p>We have the following committees in place as part of the governance framework:</p> <ul style="list-style-type: none"> <li>• Best Execution Committee</li> <li>• Low Touch cash governance meeting</li> <li>• System &amp; Algorithm Controls Committee</li> </ul>
<b>(8) Market Commentary</b>	<p>When we provide research, bespoke data, or market commentary, we are not acting as your adviser and we do so with the expectation that you are a sophisticated investor capable of making your own investment decisions without reliance on suggestions or information we may provide.</p>

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<b>(9) Trading Limits</b>	<p>To the extent we communicate or otherwise impose notional or share limits, any such limits are for the benefit of Citi and have the goal of fulfilling Citi's regulatory obligations and credit requirements.</p> <p>You may not rely on any such limits for your risk management purposes.</p>
<b>(10) Confidentiality / Privacy</b>	<p>We are bound by contractual and regulatory obligations relating to confidential information and have adopted policies and procedures to assist us in meeting these obligations:</p> <p>We may make use of information provided to us as principal in order to effectuate and risk manage transactions, as well as for other risk management purposes. Specifically, unless otherwise agreed, we may use the economic terms of a transaction in order to evaluate and/or source liquidity and/or execute risk-mitigating transactions or determine what prices we quote to third parties. Such use could adversely affect the Client who provided the information to us. In addition, as part of our obligations as a regulated entity, we share Client and transaction information as required by our global regulators.</p> <p>We analyze information regarding executed transactions on an individual and aggregate basis for a variety of purposes, including credit and market risk management, sales coverage, and Client relationship management. We may analyze, comment on, and disclose anonymized and/or aggregated information regarding executed transactions, together with other relevant market information, internally and to third parties, as market color. We may also use such anonymized and/or aggregated information in products, services or data that we offer as part of our business.</p> <p>Also see Citi's global Privacy Notice here: <a href="https://www.citigroup.com/citi/privacy.html">https://www.citigroup.com/citi/privacy.html</a></p>
<b>(11) Conflicts of Interest</b>	<p>Please refer to Citi's Conflicts of Interest Policy located here: <a href="https://www.citibank.com/icg/global_markets/docs/Description-of-Conflicts-of-Interest-Policy-UK-EEA.pdf">https://www.citibank.com/icg/global_markets/docs/Description-of-Conflicts-of-Interest-Policy-UK-EEA.pdf</a></p>

## EMEA Cash Equities Disclosures

(Updated September 2020)

<b>(12) Data Management</b>	<p>Citi analyzes public trading-related data and Citi-owned order data to improve its trading decisions (e.g., by understanding of market dynamics, to determine its trading strategy or to evaluate its capital commitment trades). Individual customer orders entered into Citi high-touch execution channels, and into Central Risk, are included in such analyses on a post-trade basis. Individual customer orders entered into low-touch execution channels are not included in such analyses without the express permission of the client, but may be analyzed by Citi personnel who support the low-touch execution channel in order to optimize the low-touch offering. Customer orders may be included in aggregate analyses of data (e.g., at the level of sector, product type or client type).</p> <p>We may also use such anonymized and/or aggregated information in products, services or data that we offer as part of our business. For more information, please contact your Citi representative.</p>
<b>(13) Quantitative Analysts</b>	<p>As per MiFID guidelines, Citi maintains a record of all Equities orders received, and executed. These records are generally available to Technology, Compliance and control function personnel in order to surveil trading and monitor operational status. Additionally, certain front-office personnel employ quantitative techniques to analyze these records for various business purposes (e.g., to manage credit and market risk, to enable client relationship management, to improve trading decisions, to improve both CR and EE offerings, to produce market commentary, etc.). These personnel may be organized into teams that have reporting structures separate from the Equities Division (e.g., Markets Quantitative Analytics or “MQA”) and whose supervision and compensation are directed independently from the Equities Division, or they may be embedded within a particular business within the Equities Division (e.g., Execution Advisory Services or “EAS” within the EE business) and have their supervision.</p>
<b>(14) Payment for Order Flow</b>	<p>Citi does not route to counterparties or trading venues that pay us in any form, in return for order flow. Execution is done in accordance with Citi’s Markets and Banking Execution policy:</p> <p><a href="https://www.citibank.com/icg/global_markets/docs/Citi-Markets-and-Banking-Execution-Policy.pdf">https://www.citibank.com/icg/global_markets/docs/Citi-Markets-and-Banking-Execution-Policy.pdf</a></p> <p>Select venues provide rebates on order executions that occur as a result of liquidity provision. We do route orders to some venues that offer rebates for passive liquidity.</p>