

C. COMMUNITY REINVESTMENT GOALS

Financial institution's annual Community Reinvestment Goals should include information on the number of small business loans, home mortgages, home improvement loans, and community development investments to be made within low and moderate-income neighborhoods within the City of Philadelphia.

1. Provide an overview of the financial institution's annual Community Reinvestment Goals.

Citi does not operate retail branches or deposit-taking ATMs in the City of Philadelphia and therefore does not have a CRA obligation. Citi's most recent Overall CRA Rating is "Outstanding".

2. Provide the number of small business loans, home mortgages, home improvement loans, and community development investments to be made within low and moderate-income neighborhoods within the City of Philadelphia.

| Type | 2022 Goals | 2022 Results | 2023 Goals |
|---|------------|--------------|------------|
| Small Business Loans** | N/A | N/A | N/A |
| Home Mortgages | N/A | 17 | N/A |
| Home Improvement Loans | N/A | 0 | N/A |
| Community Development Loans and Investments | N/A | 0 | N/A |

***Data is not publicly available*

If applicable, explain why previous year results did not meet the stated goal.

Citi currently has no goals set for the City of Philadelphia, since it no longer has a retail branch presence or deposit-taking ATMs.

3. Provide the actual number and dollar amounts of small business loans, home mortgages, home improvement loans, community development investments, consumer loans, and other commercial loans made in neighborhoods within the City of Philadelphia.

Calendar Year 2022

Number of Loans by Income

| Type | Low | Moderate | Middle | Upper | Total |
|--------------------------|-----|----------|--------|-------|-------|
| Residential Mortgage | 4 | 13 | 17 | 80 | 114 |
| Home Improvement | 0 | 0 | 0 | 0 | 0 |
| Small Business Loans* | N/A | N/A | N/A | N/A | N/A |
| Community Development | 0 | 0 | 0 | 0 | 0 |
| Consumer Loans** | N/A | N/A | N/A | N/A | N/A |
| Other Commercial Loans** | N/A | N/A | N/A | N/A | N/A |

| Type | Low | Moderate | Middle | Upper | Total |
|---|-----|----------|--------|-------|-------|
| Total | 4 | 13 | 17 | 80 | 114 |
| How many business loans were originated?* | N/A | N/A | N/A | N/A | N/A |

**Data is not publicly available.

Value of Loans (\$) by Income

| Type | Low | Moderate | Middle | Upper | Total |
|---|-----------|-------------|-------------|--------------|--------------|
| Residential Mortgage | \$605,095 | \$2,865,983 | \$5,489,646 | \$60,611,826 | \$69,572,247 |
| Home Improvement | 0 | 0 | 0 | 0 | 0 |
| Small Business Loans* | N/A | N/A | N/A | N/A | N/A |
| Community Development | 0 | 0 | 0 | 0 | 0 |
| Consumer Loans** | N/A | N/A | N/A | N/A | N/A |
| Other Commercial Loans** | N/A | N/A | N/A | N/A | N/A |
| Total | \$605,095 | \$2,865,983 | \$5,489,646 | \$60,611,826 | \$69,572,247 |
| % of Consumer Loans made through Credit Cards | N/A | N/A | N/A | N/A | N/A |

**Data is not publicly available.

4. Provide information on other types of community development investments made in neighborhoods within the City of Philadelphia (for example: Grants, Education, Public or related Commercial Development).

Citi Foundation provided \$40,000 in grant funds to benefit communities in Philadelphia in 2022. This is comprised of The Cities for Financial Empowerment Fund's Summer Jobs Connect Initiative, which connects youth to economic opportunities, and the REDF Employment Social Enterprise Core Program, that supports the growth of Employment Social Enterprises (ESEs).

5. Briefly describe any lending outreach programs geared toward minorities, low-income persons, immigrants, or women. This description should include the targeted community, the type of product (i.e. commercial, home lending, unsecured consumer) and any program outcomes.

Affordable homeownership within minority communities is a key objective under the Firm's commitment to Action for Racial Equity. Under the Equal Credit Opportunity Act (ECOA) and Regulation B, a special purpose credit program (SPCP) was created to support the ability of borrowers in majority diverse census tracts.

As a part of the Firm's commitment to Action for Racial Equity, Citi expanded the eligibility of our existing HomeRun & Lender Paid Assistance programs to into minority communities that are outside of the current CRA-specified criteria. This includes borrowers within a majority African American or majority Hispanic census tract in the Philadelphia MSA. The borrower income must be less than 120% of the area median family income

- HomeRun: HomeRun is Citi's portfolio mortgage program designed to meet the needs of the low-to-moderate income borrower and diverse communities. This program provides greater flexibility by offering lower down payment options, flexible underwriting, non-traditional credit, and no mortgage insurance requirement.

- Lender Paid Assistance (LPA): LPA is a non-repayable lender credit up to a maximum of \$7,500 that may be applied toward eligible closing costs including points to buy down the rate. It is available for primary residence purchase to borrowers meeting eligibility requirements around property address and income.

In addition, Citi participates in the following programs

- HomeReady: Citi participates in Fannie Mae's HomeReady community lending program through our Retail channels. Available for both for purchase and rate/term refinances, the program provides 97% maximum loan to value (LTV) financing to low- to moderate-income borrowers on 1-unit properties, including condominiums, cooperatives and PUDs, and up to 85% LTV maximum financing on 2-unit properties, 75% financing on 3-4 unit properties. Borrowers' income cannot exceed 80% of AMI.
- HomePossible: Citi participates in Freddie Mac's HomePossible community lending program through our Correspondent channel. Available for both for purchase and rate/term refinances, the program provides 97% maximum loan to value (LTV) financing to low- to moderate-income borrowers on 1-unit properties, including condominiums, cooperatives and PUDs, and up to 95% LTV maximum financing on 2-4 unit properties. Borrowers' income cannot exceed 80% of AMI.
- FHA and VA Mortgages: Citi has participated in these nationwide programs to address the need for flexible underwriting criteria and offer low down payment options. For VA loans, eligible veterans may qualify with 0% down payment.

6. Disparities in Lending: Attach a long-term strategic plan to address disparities in the Bank's or Financial Institution's lending and investment activities that may be indicated in the City's 2022 annual lending study.

All depositories are required to respond per Chapter 19-200 as referenced:

"Each depository shall also provide the City with a long term strategic plan to address disparities in its lending and investment activities. The strategic plan shall address how the depository will match or exceed peer lending performance in targeting capital access and credit needs disclosed in disparity studies commissioned by the City."

Review the specific findings pertaining to your bank in Technical Appendix K of the 2017 annual study beginning on page 197 and include an appropriate response in your annual long term strategic plan. Comment on all of the items in all tables in Technical Appendix K of the study and the subsequent narrative where your company performed lower than either "All Depositories" or "All Lenders" or both.

Label this document "Appendix II – Long Term Strategic Plan"

If disparities are not indicated in the study, then a strategic plan on programs, lending, and branching patterns should be submitted. Label this document "Appendix II – Long-Term Strategic Plan".

Please refer to **Appendix II** for Long Term Strategic Plan.



APPENDIX II

Long Term Strategic Plan

Fair lending is deeply rooted in Citi's core principle of responsible finance and its Code of Conduct. This means that Citi:

- Complies with the letter and the spirit of the US fair lending laws that prohibit discrimination in all credit and housing related activities;
- Treats applicants and customers equally and does not differentiate on any prohibited basis;
- Provides equal access and opportunity for credit for applicants regardless of race, color, religion, national origin, age, sex, sexual orientation, gender identity, gender expression, disability, marital status, familial status, receipt of public assistance, exercise of rights under the Consumer Credit Protection Act, and other factors unrelated to credit worthiness; and
- Works to maintain Citi's reputation for fairness.

To reinforce Citi's commitment to fair lending, Citi maintains a Compliance Risk Management Framework designed to prevent, detect, and correct failures in the execution of a lending program that could lead to potentially discriminatory or otherwise unfair outcomes for its customers. Citi's lending practices are subject to ongoing regulatory oversight by the Bank's primary regulator, the Office of the Comptroller of the Currency ("OCC") as well as the Consumer Financial Protection Bureau.

Citi dedicates considerable financial and human resources to meeting the homeownership needs of low- and moderate-income (LMI) people and communities, as well as communities of color. We have a dedicated Strategic Markets department to lead strategic initiatives and coordinate business units across the company to increase affordable and sustainable homeownership across all retail and third-party distribution channels.