



Citicorp International Limited

Regulatory Disclosures

**For the Year ended
December 31, 2025**

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Introduction

Purpose and Basis of preparation

The information contained in this document is for Citicorp International 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 2025 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 Citicorp International Limited ("the Company").

In thousands of Hong Kong dollar		(a)	(b)	(c)	(d)	(e)
		At December 31, 2025	At September 30, 2025	At June 30, 2025	At March 31, 2025	At December 31, 2024
Regulatory Capital						
1 & 1a	Common Equity Tier 1 (CET1)	1,963,144	2,895,709	2,531,293	2,193,624	1,920,778
2 & 2a	Tier 1	1,963,144	2,895,709	2,531,293	2,193,624	1,920,778
3 & 3a	Total capital	1,963,144	2,895,709	2,531,293	2,193,624	1,920,778
RWA						
4	Total RWA	6,848,852	7,009,167	7,165,667	7,065,713	8,734,318
4a	Total RWA (pre-floor)	6,848,852	7,009,167	7,165,667	7,065,713	
Capital Adequacy Ratios						
5 & 5a	CET1 ratio (%)	28.66%	41.31%	35.33%	31.05%	21.99%
5b	CET1 ratio (%) (pre-floor ratio)	28.66%	41.31%	35.33%	31.05%	
6 & 6a	Tier 1 ratio (%)	28.66%	41.31%	35.33%	31.05%	21.99%
6b	Tier 1 ratio (%) (pre-floor ratio)	28.66%	41.31%	35.33%	31.05%	
7 & 7a	Total capital ratio (%)	28.66%	41.31%	35.33%	31.05%	21.99%
7b	Total capital ratio (%) (pre-floor ratio)	28.66%	41.31%	35.33%	31.05%	
Additional CET1 buffer requirements						
8	Capital conservation buffer requirement (%)	2.500%	2.500%	2.500%	2.500%	2.500%
9	Countercyclical capital buffer requirement (%)	0.504%	0.500%	0.501%	0.500%	0.487%
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 (%)	3.004%	3.000%	3.001%	3.000%	2.987%
12	CET1 available after meeting the AI's minimum capital requirements (%)	20.66%	33.31%	27.33%	23.05%	13.99%
Basel III leverage ratio						
13	Total leverage ratio (LR) exposure measure	4,176,736	3,902,595	3,606,115	2,828,290	3,072,082
13a	LR exposure measure based on mean values of gross assets of SFTs	4,176,736	3,902,595	3,606,115	2,828,290	
14, 14a & 14b	LR (%)	47.00%	74.20%	70.19%	77.56%	62.52%
14c & 14d	LR (%) based on mean values of gross assets of SFTs	47.00%	74.20%	70.19%	77.56%	
Liquidity Maintenance Ratio (LMR)						
17a	LMR (%)	207888.51%	136170.78%	8211.05%	12257.19%	22068.75%

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 Citi's Legal Entity Risk Management Framework, supported by the Company's Addenda outlining the incremental legal entity specificities, 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)

- 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).
- 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.
- 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
		As at December 31, 2025	As at September 30, 2025	As at December 31, 2025
1	Credit risk for non-securitization exposures	542,227	521,929	43,378
2	Of which STC approach	542,227	521,929	43,378
24	Operational risk	6,306,625	6,487,238	504,530
27	Total	6,848,852	7,009,167	547,908

The Company does not have any credit-related derivatives and exposures to CCPs as at reporting date.

The Company has an exception of market risk under section 22(1) of the Banking (Capital) Rules.

Template L11: 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, 2025:

	(a) and (b)	(c)	(d)	(e)	(f)	(g)
	Carrying values as reported in published financial statements and the 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
Assets						
Balances with banks	2,673,143	2,673,423	-	-	-	(280)
Financial assets at fair value through other comprehensive income	1,496,062	1,496,062	-	-	-	-
Plant and equipment	281	281	-	-	-	-
Deferred tax assets	56,487	-	-	-	-	56,487
Other assets	7,251	7,261	-	-	-	(10)
Total assets	4,233,224	4,177,027	-	-	-	56,197
Liabilities						
Deposits and balances from banks	1,400,000	-	-	-	-	1,400,000
Current taxation	57,970	-	-	-	-	57,970
Other liabilities	755,623	-	-	-	-	755,623
Total liabilities	2,213,593	-	-	-	-	2,213,593

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, 2025:

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)	4,177,027	4,177,027	-	-	-
2	- Liabilities carrying value amount under regulatory scope of consolidation (as per template LI1)	-	-	-	-	-
3	Total net amount under regulatory scope of consolidation	4,177,027	4,177,027	-	-	-
4	Off-balance sheet amounts	-	-	-	-	-
5	Exposure amounts considered for regulatory purposes	4,177,027	4,177,027	-	-	-

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).

Differences between the amounts in columns (a) and (b) in template LI1

The Company's carrying values as reported in published financial statements and the carrying values under scope of regulatory consolidation are the same.

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

There is no difference between accounting values and amounts considered for regulatory purposes shown in template LI2.

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.

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, 2025:

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:	-	-	-	-	-	-	-	-
2	<i>Mid-market value</i>	-	-	-	-	-	-	-	-
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	Total adjustments	-	-	-	-	-	-	-	-

Template CCI: 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
CET1 capital: instruments and reserves			
1	Directly issued qualifying CET1 capital instruments plus any related share premium	187,556	(2)
2	Retained earnings	1,900,362	(3)
3	Disclosed reserves	(68,287)	(4) + (5)
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)	-	
6	CET1 capital before regulatory deductions	2,019,631	
CET1 capital: regulatory deductions			
7	Valuation adjustments	-	
8	Goodwill (net of associated deferred tax liability)	-	
9	Other intangible assets (net of associated deferred tax liability)	-	
10	Deferred tax assets (net of associated deferred tax liabilities)	56,487	(1)
11	Cash flow hedge reserve	-	
12	Excess of total EL amount over total eligible provisions under the IRB approach	-	
13	Credit-enhancing interest only strip, and any gain on sale and other increase in the CET1 capital arising from securitization transactions	-	
14	Gains and losses due to changes in own credit risk on fair valued liabilities	-	
15	Defined benefit pension fund net assets (net of associated deferred tax liabilities)	-	
16	Investments in own CET1 capital instruments (if not already netted off paid-in capital on reported balance sheet)	-	
17	Reciprocal cross-holdings in CET1 capital instruments	-	
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)	-	
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)	-	
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	-	
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	-	
26c	Securitization exposures specified in a notice given by the Monetary Authority	-	
26d	Cumulative losses below depreciated cost arising from the institution's holdings of land and buildings	-	
26e	Capital shortfall of regulated non-bank subsidiaries	-	
26f	Capital investment in a connected company which is a commercial entity (amount above 15% of the reporting institution's capital base)	-	
27	Regulatory deductions applied to CET1 capital due to insufficient AT1 capital and Tier 2 capital to cover deductions	-	
28	Total regulatory deductions to CET1 capital	56,487	
29	CET1 capital	1,963,144	
AT1 capital: instruments			
30	Qualifying AT1 capital instruments plus any related share premium	-	
31	of which: classified as equity under applicable accounting standards	-	
32	of which: classified as liabilities under applicable accounting standards	-	
34	AT1 capital instruments issued by consolidated bank subsidiaries and held by third parties (amount allowed in AT1 capital of the consolidation group)	-	
36	AT1 capital before regulatory deductions	-	
AT1 capital: regulatory deductions			
37	Investments in own AT1 capital instruments	-	
38	Reciprocal cross-holdings in AT1 capital instruments	-	
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)	-	

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	-	
41	National specific regulatory adjustments applied to AT1 capital	-	
42	Regulatory deductions applied to AT1 capital due to insufficient Tier 2 capital to cover deductions	-	
43	Total regulatory deductions to AT1 capital	-	
44	AT1 capital	-	
45	Tier 1 capital (T1 = CET1 + AT1)	1,963,144	
	Tier 2 capital: instruments and provisions		
46	Qualifying Tier 2 capital instruments plus any related share premium	-	
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)	-	
50	Collective impairment allowances and regulatory reserve for general banking risks eligible for inclusion in Tier 2 capital	-	
51	Tier 2 capital before regulatory deductions	-	
	Tier 2 capital: regulatory deductions		
52	Investments in own Tier 2 capital instruments	-	
53	Reciprocal cross-holdings in Tier 2 capital instruments and non-capital LAC liabilities	-	
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)	-	
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)	-	
55	Significant LAC investments in Tier 2 capital instruments issued by financial sector entities that are outside the scope of regulatory consolidation	-	
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)	-	
56	National specific regulatory adjustments applied to Tier 2 capital	-	
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	-	
56b	Regulatory deductions applied to Tier 2 capital to cover the required deductions falling within BCR §48(1)(g)	-	
57	Total regulatory deductions to Tier 2 capital	-	
58	Tier 2 capital (T2)	-	
59	Total regulatory capital (TC = T1 + T2)	1,963,144	
60	Total risk weighted assets	6,848,852	
	Capital ratios (as a percentage of risk weighted assets)		
61	CET1 capital ratio	28.66%	
62	Tier 1 capital ratio	28.66%	
63	Total capital ratio	28.66%	
64	Institution-specific buffer requirement (capital conservation buffer plus countercyclical capital buffer plus higher loss absorbency requirements)	3.004%	
65	<i>of which: capital conservation buffer requirement</i>	2.500%	
66	<i>of which: bank specific countercyclical buffer requirement</i>	0.504%	
67	<i>of which: higher loss absorbency requirement</i>	0.000%	
68	CET1 (as a percentage of RWA) available after meeting minimum capital requirements	20.66%	
	National minima (if different from Basel 3 minimum)		
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
	Amounts below the thresholds for deduction (before risk weighting)		
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	-	
73	Significant LAC investments in CET1 capital instruments issued by financial sector entities that are outside the scope of regulatory consolidation	-	
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
Applicable caps on the inclusion of provisions in Tier 2 capital			
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)	-	
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	-	
78	Provisions eligible for inclusion in Tier 2 in respect of exposure	-	
79	Cap for inclusion of provisions in Tier 2 under the IRB approach and SEC-IRBA	-	

Note (j):

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
	Deferred tax assets net of deferred tax liabilities	56,487	56,487
10	<p>Explanation</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>		
<p>Remarks:</p> <p>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.</p>			

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, 2025	As at December 31, 2025	
Assets			
Balances with banks	2,673,143	2,673,143	
Financial assets at fair value through other comprehensive income	1,496,062	1,496,062	
Plant and equipment	281	281	
Deferred tax assets	56,487	56,487	(1)
Other assets	7,251	7,251	
Total Assets	4,233,224	4,233,224	
Liabilities			
Deposits and balances from banks	1,400,000	1,400,000	
Current taxation	57,970	57,970	
Other liabilities	755,623	755,623	
Total liabilities	2,213,593	2,213,593	
Shareholders' Equity			
Share capital	187,556	187,556	(2)
Reserves	1,832,075	1,832,075	
<i>of which: retained profits</i>		1,900,362	(3)
<i>capital reserves</i>		(68,919)	(4)
<i>Investment revaluation reserve</i>		632	(5)
Total shareholders' equity	2,019,631	2,019,631	
Total liabilities and shareholders' equity	4,233,224	4,233,224	

Table CCA: Main features of the Capital Instruments Issued

1	Issuer	Citicorp International Limited	Citicorp International Limited	Citicorp International Limited
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	NA	NA	NA
3	Governing law(s) of the instrument	Hong Kong	Hong Kong	Hong Kong
	<i>Regulatory treatment</i>			
4	Transitional Basel III rules [#]	NA	NA	NA
5	Post-transitional Basel III rules [*]	Common Equity Tier 1	Common Equity Tier 1	Common Equity Tier 1
6	Eligible at solo ⁹ /group/group & solo	Solo	Solo	Solo
7	Instrument type (types to be specified by each jurisdiction)	Ordinary shares	Ordinary shares	Ordinary shares
8	Amount recognised in regulatory capital (Currency in million, as of most recent reporting date)	HKD 2	HKD 998	HKD 187,555,200
9	Par value of instrument	NA	NA	NA
10	Accounting classification	Shareholders' equity	Shareholders' equity	Shareholders' equity
11	Original date of issuance	26 October 1970	31 October 1970	28 May 2007
12	Perpetual or dated	Perpetual	Perpetual	Perpetual
13	Original maturity date	no maturity	no maturity	no maturity
14	Issuer call subject to prior supervisory approval	No	No	No
15	Optional call date, contingent call dates and redemption amount	NA	NA	NA
16	Subsequent call dates, if applicable	NA	NA	NA
	<i>Coupons / dividends</i>			
17	Fixed or floating dividend/coupon	Floating	Floating	Floating
18	Coupon rate and any related index	NA	NA	NA
19	Existence of a dividend stopper	No	No	No
20	Fully discretionary, partially discretionary or mandatory	Fully discretionary	Fully discretionary	Fully discretionary
21	Existence of step up or other incentive to redeem	No	No	No
22	Noncumulative or cumulative	Noncumulative	Noncumulative	Noncumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger (s)	NA	NA	NA
25	If convertible, fully or partially	NA	NA	NA
26	If convertible, conversion rate	NA	NA	NA
27	If convertible, mandatory or optional conversion	NA	NA	NA
28	If convertible, specify instrument type convertible into	NA	NA	NA
29	If convertible, specify issuer of instrument it converts into	NA	NA	NA
30	Write-down feature	No	No	No
31	If write-down, write-down trigger(s)	NA	NA	NA
32	If write-down, full or partial	NA	NA	NA
33	If write-down, permanent or temporary	NA	NA	NA
34	If temporary write-down, description of write-up mechanism	NA	NA	NA
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	NA	NA	NA
36	Non-compliant transitioned features	No	No	No
37	If yes, specify non-compliant features	NA	NA	NA

Footnote:

[#] Regulatory treatment of capital instruments subject to transitional arrangements provided for in Schedule 4H of the Banking (Capital) Rules

^{*} Regulatory treatment of capital instruments not subject to transitional arrangements provided for in Schedule 4H of the Banking (Capital) Rules

⁹ 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, 2025.

		(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%	7,542		
5	Sum		7,542		
6	Total		7,542	0.504%	34,518

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)
	Item	Value under the LR framework (in thousands of Hong Kong dollar)
1	Total consolidated assets as per published financial statements	4,233,224
2	Adjustment for investments in banking, financial, insurance or commercial entities that are consolidated for accounting purposes but outside the scope of regulatory consolidation	-
3	Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference	-
4	Adjustments for temporary exemption of central bank reserves	Not applicable
5	Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting standard but excluded from the LR exposure measure	-
6	Adjustments for regular-way purchases and sales of financial assets subject to trade date accounting	-
7	Adjustments for eligible cash pooling transactions	-
8	Adjustments for derivative contracts	-
9	Adjustment for SFTs (i.e. repos and similar secured lending)	-
10	Adjustment for off-balance sheet (“OBS”) items (i.e. conversion to credit equivalent amounts of OBS exposures)	-
11	Adjustment for prudent valuation adjustments and specific and collective provisions that are allowed to be excluded from exposure measure	290
12	Other adjustments	(56,778)
13	Leverage ratio exposure measure	4,176,736

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, 2025	At September 30, 2025
On-balance sheet exposures			
1	On-balance sheet exposures (excluding derivative contracts and SFTs, but including related on-balance sheet collateral)	4,233,513	3,943,576
2	Gross-up for derivative contracts collateral provided where deducted from balance sheet assets pursuant to the applicable accounting standard	-	-
3	Less: Deductions of receivables assets for cash variation margin provided under derivative contracts	-	-
4	Less: Adjustment for securities received under SFTs that are recognised as an asset	-	-
5	Less: Specific and collective provisions associated with on-balance sheet exposures that are deducted from Tier 1 capital	290	(157)
6	Less: Asset amounts deducted in determining Tier 1 capital	(56,487)	(40,824)
7	Total on-balance sheet exposures (excluding derivative contracts and SFTs) (sum of rows 1 to 6)	4,177,316	3,902,595
Exposures arising from derivative contracts			
8	Replacement cost associated with all derivative contracts (where applicable net of eligible cash variation margin and/or with bilateral netting)	-	-
9	Add-on amounts for PFE associated with all derivative contracts	-	-
10	Less: Exempted CCP leg of client-cleared trade exposures	-	-
11	Adjusted effective notional amount of written credit-related derivative contracts	-	-
12	Less: Permitted reductions in effective notional amount and permitted deductions from add-on amounts for PFE of written credit-related derivative contracts	-	-
13	Total exposures arising from derivative contracts (sum of rows 8 to 12)	-	-
Exposures arising from SFTs			
14	Gross amount of SFT assets (with no recognition of netting), after adjusting for sale accounting transactions	-	-
15	Less: Netted amounts of cash payables and cash receivables of gross SFT assets	-	-
16	CCR exposure for SFT assets	-	-
17	Agent transaction exposures	-	-
18	Total exposures arising from SFTs (sum of rows 14 to 17)	-	-
Other off-balance sheet exposures			
19	Off-balance sheet exposure at gross notional amount	-	-
20	Less: Adjustments for conversion to credit equivalent amounts	-	-
21	Less: Specific and collective provisions associated with off-balance sheet exposures that are deducted from Tier 1 capital	-	-
22	Off-balance sheet items (sum of rows 19 to 21)	-	-
Capital and total exposures			
23	Tier 1 capital	1,963,144	2,895,709
24	Total exposures (sum of rows 7, 13, 18 and 22)	4,177,316	3,902,595
Leverage ratio			
25 & 25a	Leverage ratio	47.00%	74.20%
26	Minimum leverage ratio requirement	3%	3%
27	Applicable leverage buffers	Not applicable	Not applicable
Disclosure of mean values			
28	Mean value of gross assets of SFTs, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	-	-
29	Quarter-end value of gross amount of SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	-	-
30 & 30a	Total exposures based on mean values from row 28 of gross assets of SFTs (after adjustment for sale accounting transactions and netted amounts of associated cash payables and cash receivables)	4,177,316	3,902,595
31 & 31a	Leverage ratio based on mean values from row 28 of gross assets of SFTs (after adjustment for sale accounting transactions and netted amounts of associated cash payables and cash receivables)	47.00%	74.20%

Table LIQA: Liquidity risk management

The purpose of liquidity management is to ensure sufficient cash flows to meet all financial commitments 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 to make new loans and investments as opportunities arise.

Liquidity is managed on a daily basis by the Treasury Teams under the direction of the Hong Kong Asset and Liability Committee ("ALCO") and in accordance with the Quarterly Liquidity Review Process (Horizontal Review), which is jointly reviewed and approved by Finance Chief Risk Officer and ALCO. The Treasury Teams are responsible for ensuring that the Company has adequate liquidity for all operations, and monitoring local and international markets for the adequacy of funding and liquidity.

The Company manages liquidity risk by holding sufficient liquid assets (e.g. cash and short term funds and securities) of appropriate quality to ensure that short term funding requirements are covered within prudent limits.

Analysis of assets and liabilities by remaining maturity

The following maturity profile is based on the remaining period at the balance sheet date to the contractual maturity date.

2025	Total	Repayable on demand	1 month or less	Over 1 month to 3 months		Undated or overdue
				Over 3 months to 1 year	Over 1 year to 3 years	
Assets						
Balance with banks	2,673,143	2,673,143	-	-	-	-
Financial assets at fair value through other comprehensive income	1,496,062	-	299,788	1,196,274	-	-
Plant and equipment	281	-	-	-	-	281
Deferred tax assets	56,487	-	-	-	-	56,487
Other assets	7,251	-	-	-	-	7,251
	<u>4,233,224</u>	<u>2,673,143</u>	<u>299,788</u>	<u>1,196,274</u>	<u>-</u>	<u>64,019</u>
Liabilities						
Deposits and balances from banks	1,400,000	-	1,400,000	-	-	-
Defined benefit liabilities	9,173	-	-	-	-	9,173
Current taxation	57,970	-	57,970	-	-	-
Other liabilities	746,450	-	-	-	-	746,450
	<u>2,213,593</u>	<u>-</u>	<u>1,457,970</u>	<u>-</u>	<u>-</u>	<u>755,623</u>
Net asset gap	<u>2,019,631</u>	<u>2,673,143</u>	<u>(1,158,182)</u>	<u>1,196,274</u>	<u>-</u>	<u>(691,604)</u>

Table CRA: General information about credit risk

Credit risk is the loss resulting from customer or counterparty default and arises on credit exposure in all forms, including settlement risk.

The Company's activities are predominantly with group entities or with institutions with strong credit standing. As such, management does not consider the credit risk for the Company's activities to be significant.

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, 2025.

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 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	-	-	-	-	-	-	-	
2	Debt securities	-	1,496,062	-	-	-	-	1,496,062	
3	Off-balance sheet exposures	-	-	-	-	-	-	-	
4	Total	-	1,496,062	-	-	-	-	1,496,062	

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, 2025 and June 30, 2025 respectively.

In thousands of Hong Kong dollar		(a)
		Amount
1	Defaulted loans and debt securities at end of the previous reporting period	-
2	Loans and debt securities that have defaulted since the last reporting period	-
3	Returned to non-defaulted status	-
4	Amounts written off	-
5	Other changes	-
6	Defaulted loans and debt securities at end of the current reporting period	-

As at reporting date, the Company has no outstanding reportable item in this template.

Table CRB: Additional disclosure related to credit quality of exposures

Credit losses and impairment of assets

The Company recognises loss allowances for Expected Credit Loss (“ECL”) on financial assets measured at amortised cost and FVOCI and 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. 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.

Measurement of ECLs

ECLs are a probability-weighted estimate of credit losses. They are measured as follows:

- financial assets that are not credit-impaired at the reporting date: as the present value of all cash shortfalls (i.e. the difference between the cash flows due to the entity in accordance with the contract and the cash flows that the Company expects to receive); and
- financial assets that are credit-impaired at the reporting date: as the difference between the gross carrying amount and the present value of estimated future cash flows.

Credit-impaired financial assets

At each reporting date, the Company assesses whether financial assets carried at amortised cost and FVOCI are credit-impaired. A financial asset is ‘credit-impaired’ when one or more events that have a detrimental impact on the estimated future cash flows of the financial asset have occurred.

Evidence that a financial asset is credit-impaired includes the following observable data:

- significant financial difficulty of the borrower or issuer,
- a breach of contract such as a default or being more than 90 days past due; or
- it is becoming probable that the borrower will enter bankruptcy or other financial reorganisation

Write-off

The gross carrying amount of a financial asset is written off when the Company has no reasonable expectations of recovering a financial asset in its entirety or a portion thereof.

As at reporting date, the Company has no impaired, past due or restructured exposures.

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.

Given the business activities of the Company, there is no collateral received or managed in its normal operation.

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, 2025.

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	-	-	-	-	-
2	Debt securities	1,496,062	-	-	-	-
3	Total	1,496,062	-	-	-	-
4	Of which defaulted	-	-	-	-	-

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 STC approach as at December 31, 2025.

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	1,496,060	-	1,496,060	-	-	0%
2	PSE exposures	-	-	-	-	-	0%
2a	Of which: domestic PSEs	-	-	-	-	-	0%
2b	Of which: foreign PSEs	-	-	-	-	-	0%
3	Multilateral development bank exposures	-	-	-	-	-	0%
4	Bank exposures	2,673,423	-	2,673,423	-	534,685	20%
5	Securities firm exposures	-	-	-	-	-	0%
6	Corporate exposures	-	-	-	-	-	0%
7	CIS exposures	-	-	-	-	-	0%
8	Cash items	-	-	-	-	-	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	-	-	-	-	-	0%
11	Residential mortgage loans	-	-	-	-	-	0%
12	Other exposures which are not past due exposures	7,542	-	7,542	-	7,542	100%
13	Past due exposures	-	-	-	-	-	0%
14	Significant exposures to commercial entities	-	-	-	-	-	0%
15	Total	4,177,025	-	4,177,025	-	542,227	13%

Template CR5: Credit risk exposures by exposure 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, 2025.

In thousands of Hong Kong dollar

		0%	20%	50%	100%	150%	Other	Total credit exposure amount (post-CCF and post-CRM)
1	Sovereign exposures	1,496,060	-	-	-	-	-	1,496,060
2	Public sector entity exposures	-	-	-	-	-	-	-
3	Multilateral development bank exposures	-	-	-	-	-	-	-
3a	Unspecified multilateral body exposures	-	-	-	-	-	-	-
4	Bank exposures	2,673,423	-	-	-	-	-	2,673,423
4a	Qualifying non-bank financial institution exposures	-	-	-	-	-	-	-

Template CRS: Credit risk exposures by exposure classes and by risk weights – for STC approach (continued)

5	Eligible covered bond exposures	10%	15%	20%	25%	35%	50%	100%	Other	Total credit exposure amount (post-CCF and post-CRM)	
		-	-	-	-	-	-	-	-	-	
6	General corporate exposures	20%	30%	50%	65%	75%	85%	100%	150%	Other	Total credit exposure amount (post-CCF and post-CRM)
6a	Of which: non-bank financial institution exposures excluding those reported under row 4a	-	-	-	-	-	-	-	-	-	-
6b	Specialized lending	20%	50%	75%	80%	100%	130%	150%	Other	Total credit exposure amount (post-CCF and post-CRM)	
		-	-	-	-	-	-	-	-	-	
7	Equity exposures	100%	250%	400%	Other	Total credit exposure amount (post-CCF and post-CRM)					
		-	-	-	-	-				-	
7a	Significant capital investments in commercial entities	250%	400%	1250%	Other	Total credit exposure amount (post-CCF and post-CRM)					
		-	-	-	-	-				-	
7b	Holdings of capital instruments issued by, and non-capital LAC liabilities of, financial sector entities	150%	250%	400%	Other	Total credit exposure amount (post-CCF and post-CRM)					
		-	-	-	-	-				-	
7c	Subordinated debts issued by banks, qualifying non-bank financial institutions and corporates	150%	Other	Total credit exposure amount (post-CCF and post-CRM)							
		-	-	-						-	
8	Retail exposures	45%	75%	100%	Other	Total credit exposure amount (post-CCF and post-CRM)					
		-	-	-	-	-				-	
8a	Exposures arising from IPO financing	0%	Other	Total credit exposure amount (post-CCF and post-CRM)							
		-	-	-						-	

Template CR5: Credit risk exposures by exposure classes and by risk weights – for STC approach (continued)

		0%	20%	25%	30%	35%	40%	45%	50%	60%	65%	70%	75%	85%	90%	100%	105%	110%	150%	Other	Total credit exposure amount (post-CCF and post-CRM)	
9	Real estate exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9a	Of which: regulatory residential real estate exposures (not materially dependent on cash flows generated by mortgaged properties)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9b	Of which: no loan splitting applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9c	Of which: loan splitting applied (secured)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9d	Of which: loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9e	Of which: regulatory residential real estate exposures (materially dependent on cash flows generated by mortgaged properties)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9f	Of which: regulatory commercial real estate exposures (not materially dependent on cash flows generated by mortgaged properties)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9g	Of which: no loan splitting applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9h	Of which: loan splitting applied (secured)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9i	Of which: loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9j	Of which: regulatory commercial real estate exposures (materially dependent on cash flows generated by mortgaged properties)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9k	Of which: other real estate exposures (not materially dependent on cash flows generated by mortgaged properties)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9l	Of which: no loan splitting applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9m	Of which: loan splitting applied (secured)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9n	Of which: loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9o	Of which: other real estate exposures (materially dependent on cash flows generated by mortgaged properties)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9p	Of which: land acquisition, development and construction exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Template CR5: Credit risk exposures by exposure classes and by risk weights – for STC approach (continued)

		50%	100%	150%	Other	Total credit exposure amount (post-CCF and post-CRM)
10	Defaulted exposures		-	-	-	-

		100%	1250%	Other	Total credit exposure amount (post-CCF and post-CRM)
11	Other exposures	7,542	-	-	7,542

		0%	100%	Other	Total credit exposure amount (post-CCF and post-CRM)
11a	Cash and gold	-	-	-	-

		0%	20%	Other	Total credit exposure amount (post-CCF and post-CRM)
11b	Items in the process of clearing or settlement	-	-	-	-

Exposure amounts and CCFs applied to off-balance sheet exposures, categorised based on risk bucket of converted exposures (STC version)

	Risk Weight	(a)	(b)	(c)	(d)
		On-balance sheet exposure	Off-balance sheet exposure (pre-CCF)	Weighted average CCF	Exposure (post-CCF and post-CRM)
1	Less than 40%	4,169,483	-	-	4,169,483
2	40-70%	-	-	-	-
3	75%	-	-	-	-
4	85%	-	-	-	-
5	90- 100%	7,542	-	-	7,542
6	105-130%	-	-	-	-
7	131-149%	-	-	-	-
8	150%	-	-	-	-
9	250%	-	-	-	-
10	400%	-	-	-	-
11	1250%	-	-	-	-
12	Total exposures	4,177,025	-	-	4,177,025

Table MRA: Qualitative disclosures related to market risk

Citicorp International Limited (CIL) is primarily an employment entity, which does not have a trading portfolio and has an exemption from HKMA to allocate market risk capital. Trading market risk appetite will be re-assessed if there is any change in business strategy that gives rise to trading exposures or regulator seizes to provide exemption.

CIL's market risk management framework is overseen by the Board of Directors and Senior Management, ensuring robust governance and alignment with the Legal Entity Risk Appetite Framework. Market risk exposure is monitored on a daily basis with appropriate limits and triggers established to control risk within defined parameters. The Risk Management function is responsible for reviewing and setting comprehensive limits packages and permitted product lists, thereby ensuring adherence to risk management objectives. These policies and processes are governed by Citi's global Mark-to-Market Policy and are subject to regular review and approval by senior management. Independent risk control units operate separately from business lines to provide objective oversight and challenge.

The Market Risk Reporting Unit is responsible for preparing detailed risk reports that monitor exposure usage against approved limits. These reports are disseminated to relevant business units and market risk management for continuous limit monitoring. In the event of a limit excess, a formal communication protocol is initiated between the business unit and Market Risk Management to define a clear resolution plan, timeline, and trace of resolution. The models and parameters utilized within the risk management systems are regularly updated, assessed, and independently validated as defined in Citi's global policies, ensuring their accuracy and appropriateness.

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 Δ 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.

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 2025 are HKD and USD. IRR Economic Value Sensitivities do not include any netting across currencies. All favorable exposures (gains) are excluded and adverse exposures (losses) are reported.

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 2025 and comparative figures versus prior year are as follows:

In million of Hong Kong dollar		ΔEVE		ΔNII	
		31 st December 2025	31st December 2024	31 st December 2025	31st December 2024
1	Parallel up	3	3	-50	-49
2	Parallel down	0	1	51	49
3	Steeper	0	1		
4	Flattener	3	3		
5	Short rate up	4	3		
6	Short rate down	0	1		
7	Maximum	4	3	51	49
	Period	31st December 2025		31st December 2024	
8	Tier 1 capital	1,963		1,921	

Table REMA: Remuneration policy

Information provided herein is 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

Citicorp International Limited (CIL), a subsidiary of the U.S.-incorporated Citigroup Inc., maintains a compensation framework and practices that are predominantly aligned with Citi's global framework. 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 Committee) is a duly constituted committee of the Board of Directors of Citigroup Inc. which oversees Citi's global remuneration policies and practices.

The CPC Committee members are all Independent Non-Executive Directors of Citi who are selected and appointed based on their background in business generally, and in remuneration, corporate governance and/or regulatory matters specifically. They are also chosen for their capability to fulfil their responsibilities as CPC Committee members. The CPC Committee includes cross-membership with the Citi Board of Directors' Risk Management Committee, the Audit Committee, the Executive Committee, the Technology Committee as well as the Nomination, Governance & Public Affairs Committee. The CPC Committee draws on the considerable experience of the Non-Executive Directors of the Board of Citi and is empowered to draw upon internal and external expertise and advice as it determines appropriate. The CPC Committee also seeks advice from an independent compensation consultant who is currently FW Cook for executive compensation aspects.

The CPC Committee annually reviews the compensation structures for senior executives of Citi and a number of highly compensated and/or regulated individuals, in accordance with guidelines established by the CPC Committee and provides oversight of the design and structure of incentive programs globally in the context of risk management.

The CPC Committee's terms of reference are documented in the CPC Committee Charter, which establishes the scope and mandate of the CPC Committee's responsibilities and the general principles governing Citi remuneration policy globally. The latest Charter is available online at: <https://www.citigroup.com/rcs/citigpa/storage/public/compensation-performance-management-and-culture-committee-charter.pdf>.

Locally, the Board of CIL is responsible for overseeing senior management's implementation of the remuneration framework applying to CIL to ensure compliance with the applicable regulatory requirements and assessing whether the CIL'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) are based on Citi's Compensation Philosophy and have 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 CIL firm-wide strategy or activities, or who oversee a major material business line. The Chief Executive (CE), Alternate Chief Executive, Executive Directors and Heads of Control Function (Finance, Independent Compliance Risk Management, Internal Audit and Risk Management), will be classified as Senior Management.

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 CIL that could materially impact on CIL capital sufficiency level.

The current version of the Principles was last updated in July 2025 and was duly approved by the Hong Kong Citi Country Officer (CCO) and Banking Head, and the Board of CIL. The next annual review has been scheduled for Q2/Q3 2026.

Table REMA: Remuneration policy (Continued)

Citi's Compensation Philosophy

The Citi Compensation Philosophy was developed and approved by the CPC, in consultation with management, independent consultants and Citi's senior risk officers, HR and the relevant functions. It sets out Citi's commitment to properly balance risk-taking and risk-mitigating incentives, and the oversight from the CPC Committee on the design and operation of Citi's compensation programs. The Compensation Philosophy describes Citi's approach to balancing six primary objectives, as outlined below, that Citi's compensation programs are designed to achieve:

- Incentivize conduct that aligns with shareholder and other stakeholder interest
- Reinforce a business culture based on accountability, achieving excellence and maintaining the highest ethical and control standards through Citi's Leadership Principles
- Encourage prudent individual and group decision-making in regard to risk consistent with applicable regulatory guidance and Citi's Mission and Value Proposition Statement
- Function as a tool to attract and retain the best talent and to reward talent for engaging in appropriate behaviors that support Citi's corporate goals
- Encourage behaviours that are in the best interest of our customers, shareholders and the goals of the organization
- Align pay with achievement of important risk and control, regulatory, strategic and financial-based objectives

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. Fixed remuneration is set appropriately to attract, retain and motivate employees in line with market practices. Fixed remuneration primarily reflects an employee's professional experience and organisational responsibilities as set out in the employee's job description and terms of employment.

Citi operates a flexible remuneration policy, in which variable remuneration is discretionary, subject to individual, business and firm performance, and can be reduced to zero, where permitted by law.

Citi's Discretionary Incentive and Retention Award Plan (DIRAP) is the scheme under which employees globally are awarded annual bonuses. It is designed to incentivize, reward and retain employees based on their performance and contribution

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.

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

Remuneration is determined by a combination of factors which include firm, business and individual performance / contribution. Individual performance ratings reflect both 'What' outcomes have been achieved and 'How' they were achieved. Performance ratings then guide bonus decision-making.

Bank & Business Line Performance

Citigroup employs a comprehensive set of performance metrics to evaluate its bank-wide performance and that of its various business lines. Financial measures include but are not limited to Return on Tangible Common Equity (RoTCE), Tangible Book Value per Share, Net Income and earnings per share. Other measures include but are not limited to operating efficiency ratios, expense ratios, liquidity ratios, regulatory and strategic goals achievements.

Determination of Bonus Pools

Bonus pools are determined at a global level. The process for determining incentive compensation pools includes the consideration of risk-balanced performance metrics, thereby limiting incentives for employees to take imprudent risks.

Citi's incentive compensation program is a discretionary program. The level of any bonus pool is based on various quantitative and qualitative factors and discretionary considerations, including performance against key risks (including conduct risk, operational risk, etc.) and control objectives.

Table REMA: Remuneration policy (Continued)

Individual Performance Link to Remuneration

Citi's various performance and accountability processes align Citi's remuneration practices with overall strategy, objectives, values and long-term interests. They reinforce achievement of goals and expected behaviour to ensure appropriate accountability, performance and compensation outcomes.

The Performance Management Framework (PM Framework) is applicable to all Citi employees globally and the structure leverages four overarching pillars (Leadership, Risk & Control, Financial Performance, and Client & Franchise Outcomes) against which all employees set their performance goals for the performance year.

To ensure Goal setting is consistent and goals are properly aligned to the strategy of the organisation, Citi operates a top-down goal setting approach. First the organisational strategic goals are set, followed by the objective of each business, followed by individual teams and finally rolling down to the Individual employee.

Employee performance is evaluated on a four-point scale at year end by a manager assessment. Pillar ratings are converted to two performance ratings: a "How" rating (composed solely by the Leadership performance pillar evaluation) and a "What" rating (auto-calculated based on the combined ratings of the applicable sub-pillars). The two performance ratings ("How", "What") carry equal weight, however there is no overall combined rating. Certain employees are also subject to a range of enhanced performance assessment and accountability processes.

Evaluation ratings generated through this PM Framework will be used for employee compensation determinations. Allocations of pools among individual employees also take into account risk, based on performance ratings in the Risk and Control Pillar of our PM Framework. The Risk & Control Pillar measures employees on a 4-point scale for performance against their Risk & Control goals. When making a compensation decision, managers are expected to account for risk and control performance and incentivizing good behaviours and are provided guidance to this effect.

Remuneration of Control Function employees

Citi maintains the independence of the compensation process for key Functions (e.g. ICRM and Risk Management) to minimise any scope for potential conflicts of interest.

Whilst remuneration levels are influenced by Citi's overall performance, individual compensation for employees in Functions is determined by reference to performance against objectives relevant to their function and assessed within their respective Functions.

Functions are allocated a bonus pool separate from the revenue generating businesses, and decisions about allocations of those pools are made within the Functions themselves. Employees engaged in Functions have direct reporting lines into the Function managers that are separate from the business. The Function managers are responsible for the reward of those employees both in terms of year-end compensation, salary increases and promotion.

The Financial Performance Pillar is not applicable for employees in Risk Management, Internal Audit and ICRM.

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

At Citi, variable remuneration is typically awarded in cash and Citi shares (Citi equity) and is subject to mandatory deferral periods where the individual's total annual variable compensation exceeds globally set thresholds. Citi operates a standard deferral policy period that is pro-rated over four years, which it considers proportionate to the risks. Citi believes that awarding equity and deferred awards is an effective means of aligning employee interests with those of shareholders and other stakeholders.

Deferred awards have ex-post adjustment mechanisms that may result in the cancellation of all or part of unpaid amounts. These conditions ensure an appropriate balance for risk and aligns the actual pay-out to employees with business performance.

For Covered Employees, the full deferral will be cancelled if it is determined that the participant has had significant responsibility for a Material Adverse Outcome (MAO) or Violation of any Material Risk Limits (MVRL). A MAO means any Incident that results in Material Harm to Citi. A MVRL means that the participant materially violated any material risk limits established or revised by senior management and/or risk management. Significant responsibility means that the participant engaged in conduct, or was responsible for conduct, which resulted in an Incident which was determined to be a MAO or is accountable for the event under the Global Disciplinary Review Policy. A portion of the deferred equity award will be cancelled if it is determined that the participant has had a significant responsibility for a significant loss to Citi.

Generally, any unvested deferred variable remuneration is subject to clawback or 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.

If Citigroup determines within three years that a condition for an award settlement was not met, the bank can clawback the distributed shares or their greater fair market value, along with any cash payments, before any tax or other deductions.

Template REM1: Remuneration awarded during financial year

Remuneration amount and quantitative information ^{(i) (ii) (iii)}		a & b	
		Senior management	
1	Fixed remuneration	Number of beneficiaries	6
2		Total fixed remuneration	4.3
3		Of which: cash-based ^(iv)	4
4		Of which: deferred	-
5		Of which: shares or other share-linked instruments	-
6		Of which: deferred	-
7		Of which: other forms ^(v)	0.3
8		Of which: deferred	-
9	Variable remuneration	Number of beneficiaries	5
10		Total variable remuneration^(vi)	5.9
11		Of which: cash-based	3.6
12		Of which: deferred	-
13		Of which: shares or other share-linked instruments ^(vii)	2.4
14		Of which: deferred	2.4
15		Of which: other forms	-
16		Of which: deferred	-
17	Total remuneration	10.2	

Additional Notes:

- i. Reporting is provided in HKD millions. All non-HKD amounts are converted using FX rate for December 2025. Numbers presented in tables may not precisely sum to their respective totals due to rounding conventions.
- ii. 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. 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.
- iii. 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.
- iv. Fixed remuneration in cash includes salary.
- v. Fixed remuneration in other forms includes the value of any pension and benefits.
- vi. Variable remuneration awarded in respect of 2025 performance year.
- vii. Share-based awards are made in Citi shares and represent value at grant.

Template REM2: Special payments

	a	b	c	d	e	f
Special payments ^{(i) (ii)}	Guaranteed bonuses		Sign-on awards		Severance payments	
	Number of beneficiaries	Total amount	Number of beneficiaries	Total amount	Number of beneficiaries	Total amount
Senior Management and Key Personnel ⁽ⁱⁱⁱ⁾	-	-	-	-	-	-

Additional Notes

i. Nil to report for this period

Template REM3: Deferred remuneration

	a	b	c	d	e
Deferred and retained remuneration in millions ^{(i) (ii)}	Total amount of outstanding deferred remuneration ⁽ⁱⁱⁱ⁾	Of which: total amount of outstanding deferred and retained remuneration exposed to ex post explicit and/or implicit adjustment	Total amount of amendment during the year due to ex post explicit adjustments	Total amount of amendment during the year due to ex post implicit adjustments	Total amount of deferred remuneration paid out in the financial year ^(iv)
Cash	-	-	-	-	0.2
Shares	9.6	9.6	-	3.8	2.3
Cash-linked instruments	-	-	0.8	-	0.9
Other	-	-	-	-	-
Total	9.6	9.6	0.8	3.8	3.5

Additional Notes:

- i. Value of all non-HKD cash, share awards and share-linked instruments are converted using the FX rate for December 2025. Numbers presented in tables may not precisely sum to their respective totals due to rounding conventions.
- ii. 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. The 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.
- iii. 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.
- iv. Value of outstanding share awards and share-linked instruments is calculated using Citi closing share price as at December 31, 2025.
- v. Shares and share-linked instruments are considered paid when vested. The Fair Market Value (FMV) at vest is determined by the closing New York Stock Exchange stock price for Citigroup common stock the trading day immediately prior to the award's vest date.

Table ORA: General information on operational risk framework

Operational Risk is the risk of loss resulting from inadequate or failed internal processes, people and systems, or from external events. This definition of operational risk includes legal risk – which is the risk of loss (including litigation costs, settlements and regulatory fines) resulting from the failure of Citi to comply with laws, regulations, prudent ethical standards and contractual obligations in any aspect of Citi’s business – but excludes strategic and reputation risks.

Operational risk is inherent to Citi’s global business processes and related activities, products, and services. Citi’s objective is to keep or reduce residual operational risk to within acceptable levels, which is formalized in the operational risk appetite. This is managed through an overall framework with checks and balances that include recognized ownership of the risk by the businesses, with independent risk management oversight. Citi mitigates its operational risk by setting up its key controls and assessments according to Citigroup’s and the Regulators’ standards. They are also evaluated, monitored, and managed by its sound governance structure. The Operational Risk Management (ORM) team establishes and oversees the Operational Risk Policy, an integral part of the Enterprise Risk Management Framework. There are standards in place for consistent risk identification, measurement, monitoring and reporting supported by a robust governance structure comprising of the three lines of defence (i.e. Business, Independent Risk, Independent Compliance and Internal Audit further augmented by enterprise control and support functions, i.e. HR and Legal).

Principles of Good Operational Risk Management:

Strong Ownership and Oversight

- Businesses and Functions self-identify issues before Regulators and Internal Audit
- Issues are remediated on time and not reopened
- Significant events are escalated timely and consistently evaluated for lessons learned
- Governance Committees actively oversee risk identification and control remediation
- Management implements effective controls to mitigate significant risks
- Products and services are delivered as intended
- Credible second-line operational risk managers

Dynamic Framework and Tools

- Risk Appetite is clearly articulated and monitored with key indicators □
- Taxonomies and scoring methodologies are intuitive and used consistently
- Managers Control Assessment (MCA) provides a dynamic residual risk picture and tool for proactive prioritization
- End-to-end processes are assessed by management
- Material risks are identified and aligned with capital / stress projections
- Reporting is timely and clearly articulates the operational risk profile
- Technology platform that integrates all framework elements

Template ORI: Historical losses

The following table shows that aggregate operational risk losses incurred over the past ten consecutive financial years as at 31 December 2025, based on the accounting date of the incurred losses.

		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
		T	T-1	T-2	T-3	T-4	T-5	T-6	T-7	T-8	T-9	Average
In thousands of Hong Kong dollar												
Using HKD200,000 threshold												
1	Total amount of operational losses net of recoveries (no exclusions)	-	-	-	-	-	-	-	-	-	-	-
2	Total number of operational risk losses	-	-	-	-	-	-	-	-	-	-	-
3	Total amount of excluded operational risk losses	-	-	-	-	-	-	-	-	-	-	-
4	Total number of exclusions	-	-	-	-	-	-	-	-	-	-	-
5	Total amount of operational losses net of recoveries and net of excluded losses	-	-	-	-	-	-	-	-	-	-	-
Using HKD1 million threshold												
6	Total amount of operational losses net of recoveries (no exclusions)	-	-	-	-	-	-	-	-	-	-	-
7	Total number of operational risk losses	-	-	-	-	-	-	-	-	-	-	-
8	Total amount of excluded operational risk losses	-	-	-	-	-	-	-	-	-	-	-
9	Total number of exclusions	-	-	-	-	-	-	-	-	-	-	-
10	Total amount of operational losses net of recoveries and net of excluded losses	-	-	-	-	-	-	-	-	-	-	-
Details of operational risk capital charge calculation												
11	Are losses used to calculate the ILM (yes/no)?	No										
12	If “no” in row 11, is the exclusion of internal loss data due to non-compliance with the minimum loss data standards (yes/no)?	No										
13	Loss event threshold: HKD200,000 or HKD 1 million for the operational risk capital charge calculation if applicable	HKD200,000										

Template OR2: Business indicator and business indicator components breakdown

The following table shows the BI and its components which are used in the calculation of the operational risk capital requirement over the past 3 consecutive financial years as at 31 December 2025.

In thousands of Hong Kong dollar		(a)	(b)	(c)
	BI and its subcomponents	T	T-1	T-2
1	Interest, leases and dividend component	51,619		
1a	Interest and leases income	53,056	109,714	95,096
1b	Interest and leases expenses	30,362	37,966	34,681
1c	Interest earning assets	2,479,858	1,982,584	2,516,833
1d	Dividend income	-	-	-
2	Services component	4,149,170		
2a	Fee and commission income	3,988,205	4,060,261	4,171,643
2b	Fee and commission expenses	18,753	14,196	13,783
2c	Other operating income	-	-	-
2d	Other operating expenses	71,190	72,803	83,406
3	Financial component	3,629		
3a	Net P&L on trading book	-	-	-
3b	Net P&L on banking book	5,776	4,165	(946)
4	BI	4,204,418		
5	Business indicator component (BIC)	504,530		

Template OR3: Minimum operational risk capital requirement

The following table shows operational risk capital requirement as at 31 December 2025.

In thousands of Hong Kong dollar		(a)
1	Business indicator component (BIC)	504,530
2	Internal loss multiplier (ILM)	1
3	Minimum operational risk capital requirement	504,530
4	Total RWA for operational risk	6,306,625

Template ENC: Asset encumbrance

The following table provides the amount of encumbered and unencumbered assets on the balance sheet under regulatory scope of consolidation as at December 31, 2025.

In thousands of Hong Kong dollar	(a)	(c)	(d)
	Encumbered assets	Unencumbered assets	Total
Balances with banks	-	2,673,143	2,673,143
Financial investments measured at fair value through other comprehensive income	-	1,496,062	1,496,062
Property, plant and equipment	-	281	281
Deferred tax assets	-	56,487	56,487
Other assets	-	7,251	7,251
Total Assets	-	4,233,224	4,233,224