



388 Greenwich St.
New York, NY 10013

March 12, 2022

Ella Skybenko
Ashley Nancy Reynolds
Business & Human Rights Resource Centre
2-8 Scrutton St, 2nd Floor
London EC2A 4RT

Sent by email to: skybenko@business-humanrights.org and reynolds@business-humanrights.org

Dear Ms. Skybenko and Ms. Reynolds,

Thank you for your inquiry regarding the findings of your “Digging in the Shadows” report and the human rights policies and performance of extractives companies in Eastern Europe and Central Asia.

As you noted, Citi has had a stated commitment to respect human rights across our value chain since we first published our [Statement on Human Rights](#) in 2007. Human rights risks including labor concerns and community impacts are also addressed in our Environmental and Social Risk Management (ESRM) Policy. Within the scope of our ESRM Policy, we evaluate environmental and social risks associated with Citi financed client projects and activities against a common set of market standards grounded in international best practice, including human rights norms and the International Finance Corporation’s Performance Standards.

However, our ability to conduct due diligence and use our leverage with clients is closely related to the type of financing provided - with project finance and other project-related lending providing the ability for closer due diligence and more leverage, general corporate lending or bonds providing less opportunity, and activities such as cash management or holding shares in a company on behalf of an investor client providing the least.

We have looked into the concerns that you raised. While we have a policy of not commenting on specific companies, to the extent the companies referenced are clients, we will consider whether additional client engagement is appropriate.

We appreciate your raising these concerns for our awareness.

Sincerely,

A handwritten signature in black ink that reads "Val C Smith". The signature is written in a cursive, flowing style.

Val Smith
Chief Sustainability Officer
Citi