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Dear Mr. Bloomer and Ms. McMullen,

Thank you for the email dated December 9, 2014. Citi is a long-standing leader on human rights issues in the banking industry, and respect for human rights is critical to our vision of enabling our customers, clients and global communities to make progress. Citi's leadership has been acknowledged by external stakeholders; for example, in the recent BankTrack "Banking with Principles" report, Citi received the highest score of any U.S.-based bank, and the Human Rights Campaign has awarded Citi a perfect score of "100" in its annual Corporate Equality Index. We are proud of Citi's record, and I am happy to provide you with more information on our human rights related policies and approach.

*Policy Commitment*

Citi published its first Statement on Human Rights in 2007, and we released an updated Statement in 2014 ([http://www.citigroup.com/citi/citizen/data/citi\\_statement\\_on\\_human\\_rights.pdf](http://www.citigroup.com/citi/citizen/data/citi_statement_on_human_rights.pdf)). In the Statement, Citi publicly states its support for the key international human rights instruments, including the Universal Declaration on Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights. Citi's Statement provides a summary of our policies and practices that help us fulfill our corporate responsibility to respect human rights. These policies and practices apply to Citi's activities across the value chain, to our employees, suppliers, clients and communities, and countries where we do business. Prior to publishing the updated Statement in 2014, we engaged with several external human rights experts on the update and incorporated much of the feedback they provided.

*Due Diligence Commitment*

An important element of our implementation of the UN Guiding Principles is our due diligence, particularly as it relates to client transactions covered by Citi's Environmental and Social Risk Management (ESRM) Policy (<http://www.citigroup.com/citi/environment/policies.htm>). A core component of our ESRM Policy is to ensure compliance with the Equator Principles (EPs). In 2013, the EPs were updated to include more robust and specific human rights standards. Citi was the Chair of the Equator Principles from 2010-2012 and led development of the EP III updating process during our term. Using our influence and leadership in this role, we worked to focus greater attention on a variety of



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social issues, including Free, Prior and Informed Consent (FPIC) for projects adversely impacting indigenous peoples in emerging markets.

Specific social issues that may arise during our ESRM due diligence for client transactions include the protection of community health, safety and security; the protection of cultural property and heritage; land acquisition and involuntary resettlement; and FPIC as described above. Citi also looks at the potential for project-related conflict risk. In addition to certain safeguards related to the above issues, Citi's ESRM Policy has a specific prohibition on harmful or exploitative forms of forced labor and child labor.

#### *Reporting*

In its Global Citizenship Report ([http://citizenship.citigroup.com/citi/about/global\\_citizenship.html](http://citizenship.citigroup.com/citi/about/global_citizenship.html)), Citi reports annually on its human rights performance as well as on ethics and anti-bribery and corruption, which can be associated with human rights abuses. Our annual Citizenship reporting includes quantitative reporting on ESRM-covered transactions where we conducted due diligence on specific human rights risks.

#### *Access to Remedy*

Citi maintains multiple channels through which employees and others may raise concerns, questions and grievances, including a global Ethics Hotline ([http://www.citibank.com/citi/investor/ethics\\_hotline.html](http://www.citibank.com/citi/investor/ethics_hotline.html)). In relevant ESRM-covered transactions, we also work with clients through our due diligence processes to ensure that access to grievance mechanisms and a process for seeking effective remedy are available.

The private sector has always played an important role in developing solutions to global challenges, and we are actively partnering with our clients to help address human rights related risks and promote economic development around the world. In all of these efforts, we are guided by a commitment to responsible finance, stakeholder engagement, transparency and reporting.

Please let me know if you have further questions.

Sincerely,

Valerie C. Smith  
Director, Corporate Sustainability