



EXCHANGE TRADED FUNDS (“ETF”) DISCLOSURE NOTICE

This notice is provided by Citigroup Global Markets Limited, Citibank, N.A. London branch, or Citibank Europe plc, UK branch each acting through its Markets division and/or Securities Services division (“**Citi**”, “**we**”, “**us**”) to Citi’s clients (“**you**”). This notice sets out certain additional information and terms supplemental to the Citi’s Terms of Business for Professional Clients and Eligible Counterparties, as amended from time to time (the “**Terms of Business**”) where you undertake business with us in relation to exchange traded funds (“**ETFs**”). In the event of inconsistency between the Terms of Business and this notice, the terms of this notice shall prevail.

1. Additional Terms for ETF Trading

In choosing to undertake business with us in relation to ETFs at your own initiative, you represent and warrant to us that:

- a. you have carried out your own independent analysis in relation to the applicable ETFs and the potential outcomes to the extent that you have deemed necessary;
- b. you have had the opportunity to consult with your own legal, regulatory, tax, business, investments, financial, and accounting advisors to the extent that you have deemed necessary or advisable so as to enable you to evaluate the merits and risks of investing in such ETFs;
- c. you have read and understood the relevant fund documentation, including a current copy of the prospectus, the key investor information documents (as applicable) and the most recent annual accounts of the ETF (as the case may be) and have had an opportunity to request such additional information from us or the relevant ETF issuer as you consider necessary or appropriate prior to your decision to enter into or purchase units of ETFs;
- d. you are not a person, corporate or entity whose holding might result in regulatory, pecuniary, legal, taxation or material administrative disadvantage for the ETF or its shareholders;
- e. you shall comply with the terms of the relevant prospectus or similar offering document including, without limitation, any selling restrictions contained therein; and
- f. you shall comply with all laws and regulations and requirements imposed by any competent regulatory body, applicable in the circumstances, whether domestic or foreign, or any agreement entered into with or between any competent regulatory, prosecuting, tax or governmental authority or agency, or central bank, in any jurisdiction in which you undertake any activities in relation to such ETFs.

2. Key Investor Information Document and Prospectus for UCITS ETFs

Pursuant to Directive 2009/65/EC, a key investor information document (“**KIID**”) is required to be made available to investors before they invest in units of ETFs that are undertakings for collective investment in transferable securities (“**UCITS**”). A KIID provides summary information in relation to an ETF to assist investors in understanding the nature and risks of investing in an ETF prior to making an investment decision. Investors should also refer to the applicable prospectus and the annual and half-yearly reports for more detailed information in respect of an ETF.

Where deemed appropriate and on an ongoing basis, prior to making any investment decision you may locate the applicable KIID, prospectus and other fund documentation by visiting the applicable fund manager’s website. For convenience, links to the applicable fund manager’s website can be located through Citi’s special dedicated webpage located here: http://www.citibank.com/icg/global_markets/emea_etf_kiids.jsp (the “**Webpage**”).

The Webpage does not constitute an offer or an offer to the public, an invitation to offer or a recommendation to enter into any transaction, to participate in any trading strategy or to invest in any ETF or any other Financial



Instrument. No representation, warranty or undertaking, express or implied, is thereby given as to the accuracy or completeness of the information contained in the KIIDs, the prospectuses or any other fund documentation by Citi or by any of its officers, directors, employees, agents, contractors or consultants and no liability is accepted by such persons for the accuracy or completeness of any such information.

3. Inducements

In the course of providing services to you, we may pay or receive fees, commissions, rebates or non-monetary benefits from third parties (including any affiliates). In each case, such payments or benefits (i) shall be designed to enhance the quality of the services we provide to you; and (ii) shall not impair compliance with our duty to act honestly, fairly and professionally in accordance with our clients' best interests.

Where Citi pays or receives any fee, commission, rebate or non-monetary benefit, we will disclose the existence, nature and amount of the payment of non-monetary benefit, or where the amount cannot be ascertained, the method for calculating that amount to you in accordance with our regulatory obligations [here](#).

For further information relating to Inducements (including the provision or receipt of any minor non-monetary benefits that may be classified as acceptable), please refer to the Citi's "Inducements" disclosure document which can be located [here](#).

4. Conflicts of Interest

Citi seeks to ensure it is able to appropriately and effectively identify and manage potential conflicts. It may manage potential conflicts through avoidance, establishing information barriers or acting with an appropriate level of independence and/or by providing appropriate disclosure of the conflict to affected clients.

During the normal course of business, Citi may (i) be appointed by an applicable fund management company (or such other third party acting for and on behalf of an ETF) to (a) serve as an authorised participant with the objective of subscribing directly for and redeeming shares with an ETF (on the primary market) on a cash or in-kind basis; and (b) enter into, promote, offer or sell the ETFs with clients (on the secondary market); and (ii) enter into, promote, offer or sell any underlying assets or contracts (whether or not structured), which may be linked either directly or indirectly to the ETF ("**constituents**"). Citi may at any time (1) have long or short principal positions or actively trade (whether or not through making markets to its clients) positions in or relating to the ETF or any constituent; (2) invest in or engage in transactions with or on behalf of other persons relating to the ETF and/or any constituent; (3) undertake hedging transactions (for the purposes of any constituent or contract) which may adversely affect the level, price or rate or other factor underlying the ETF and/or any constituent; (4) have an investment banking or commercial relationship with the ETF or any of its appointed agents, of any constituent and have access to information from ETF issuers or other issuers of securities or other constituents (or any of their appointed agents); or (5) publish research in respect of any ETF or constituent.

Such activity may or may not affect the performance of the ETF, but potential investors and counterparties should be aware that a conflict of interest may arise when a person acts in more than one capacity, and such conflict of interest may affect (whether in a positive manner or a negative manner) the performance of the ETF. Furthermore, Citi may receive remuneration from a fund management company (or such other third party acting for and on behalf of an ETF). See section 2 above for further information.

For further information relating to potential conflicts of interest, please refer to Citi's "Description of Citi Conflicts of Interest Policy" which can be located [here](#).



5. Risks

In choosing to transact with us, we shall assume that you understand both the risks associated with the ETFs and the market factors, which may cause the ETFs to underperform (compared to other investments or strategies) or which may result in losses for you.

For further information relating to risks relating to a particular investment, please refer to the relevant prospectus for further information. We would also refer to a general description of the nature and risks associated with ETFs, which may be located [here](#).



© 2021 Citigroup Global Markets Limited. All rights reserved. Citi and the Citi and Arc Design are trademarks and service marks of Citigroup or its affiliates and are used and registered throughout the world. Citigroup Global Markets Limited is authorised in the United Kingdom by the Prudential Regulation Authority and regulated in the United Kingdom by the Financial Conduct Authority and the Prudential Regulation Authority.

This notice is subject to amendment from time to time. This notice does not constitute, nor is it intended to constitute, an offer of any share in any ETF in any jurisdiction. Nothing in this notice constitutes legal, financial or investment advice. For the avoidance of doubt, neither Citi nor any of its affiliates or suppliers, or their directors, officers, employees, representatives, delegates or agents accepts any duty of care or responsibility to the recipient or any other party into whose hands this notice may come.

This notice is Citi's proprietary material and its contents may not be reproduced, redistributed, stored in a retrieval system, or passed on, directly or indirectly, to any other person or published, or transmitted by any other form or means whether electronic, mechanical, photocopying, recording or otherwise in whole or in part, without the prior written consent of Citi.

This notice is not intended for distribution to or use by any person in a jurisdiction where such distribution is prohibited by applicable law or regulation. This notice (and any non-contractual obligations arising from it) shall be governed by and construed in accordance with English law.