

RESOLVED: Shareholders request the Board of Directors provide a report to shareholders, at reasonable cost and omitting proprietary and confidential information, outlining the effectiveness of Citigroup's policies, practices, and performance indicators in respecting internationally-recognized human rights standards for Indigenous Peoples' rights in its existing and proposed general corporate and project financing.

The UN Declaration on the Rights of Indigenous Peoples and International Labour Organization Convention 169 concerning Indigenous and Tribal Peoples in Independent Countries are internationally-recognized standards for Indigenous Peoples' rights.¹ These rights violations present risks for Citigroup that can adversely affect shareholder value, including reputational damage, project disruptions, and civil and criminal liability.² Citigroup has financed projects and companies that violate Indigenous Peoples' rights, notably as a lead financier of the Dakota Access pipeline.³ Also providing \$5 billion to Enbridge through 2021, enabling the widely opposed Enbridge Line 3 and Line 5 pipeline reroutes.⁴ Citigroup has since financed Enbridge with \$3 billion, including \$1.39 billion in 2023.⁵

Indigenous leaders from the Great Lakes tribes call Enbridge's Line 5 reroute "an act of cultural genocide."⁶ A 2023 ruling found that Line 5 was operating illegally on Bad River Band territory since 2013 and ordered Enbridge to pay over \$5 million and to cease operating Line 5 on the reservation by 2026.⁷ In 2021, Michigan's twelve federally recognized Tribal Nations requested President Biden decommission Line 5,⁸ noting deceptive tactics, poor environmental track record, and risk of "catastrophic damage" to Indigenous Peoples' rights.⁹ Companies like Enbridge, financed by Citigroup, fail to uphold Indigenous Peoples' right to free, prior, and informed consent (FPIC).¹⁰

Citigroup faces ongoing protests for its role as a top financier of oil and gas operations in the Amazon rainforest, which poses a serious threat to Indigenous Peoples.¹¹ Citigroup has financially supported Petroperú, linked to widespread Indigenous opposition and recurring oil spills in the Peruvian Amazon.¹² In October 2024, a Petroperú pipeline spilled 6,000 liters of oil, contaminating water and food for over 10,000 Indigenous Peoples.¹³ Petroperú nears insolvency, posing material risks to investors.¹⁴ Citigroup finances Frontera Energy, which has faced Indigenous protests and blockades, frequently halting operations in Peru and Colombia over oil spills, health hazards, and Indigenous Peoples' rights violations.¹⁵

Citigroup faces reputational risk if its financing undermines its "climate forward" commitments.¹⁶ Citigroup's 2024 Indigenous People's Rights Report¹⁷ was inadequate and lacked impacted stakeholders' perspectives.¹⁸ Citigroup previously adhered to the Equator Principles to manage environmental and social risk, but withdrew in 2024, raising

concerns that it backpedals on climate and stakeholder commitments.¹⁹ Effective policies protecting Indigenous Peoples' rights are critical for managing material risk.

1 <https://www.un.org/development/desa/indigenouspeoples/declaration-on-the-rights-of-indigenous-peoples.html> ;

https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_INSTRUMENT_ID:312314

2 https://www.colorado.edu/program/fpw/sites/default/files/attached-files/social_cost_and_material_loss_0.pdf ; <https://amazonwatch.org/news/2022/0622-the-business-case-for-indigenous-rights>

3 <https://www.business-humanrights.org/en/latest-news/usa-citi-ceo-says-bank-approved-dakota-access-pipeline-loan-without-sufficient-regard-for-indigenous-peoples-concerns/>

4 https://www.ran.org/wp-content/uploads/2020/12/RAN-Briefing_Line3_KXL.pdf

5 <https://fossilfreeciti.org/wp-content/uploads/2024/09/Citi-Funding-Fossil-Fueled-Environmental-Racism-in-the-Gulf-South.pdf>

6 <https://www.theguardian.com/us-news/2021/feb/19/line-3-pipeline-ojibwe-tribal-lands>

7 <https://www.wpr.org/news/federal-court-arguments-bad-river-enbridge-appeal-line-5-shutdown>; <https://www.badriver-nsn.gov/wp-content/uploads/2024/03/Handout-about-Line-5-3-pages.pdf>

8 https://www.baymills.org/_files/ugd/869f65_f8e5288d82084540a9f0e7d5d6c0921f.pdf

9

https://narf.org/nill/documents/20210510BayMills_banish_Enbridge.pdf_ga=2.239143744.2105983367.1624287541-1503385769.1619537483

10 <https://www.colorado.edu/program/fpw/2022/06/13/united-nations-responds-second-time-violations-anishinaabe-rights-signals-priorities> ; <https://narf.org/bay-mills-line5-pipeline/>

11 <https://www.desmog.com/2022/04/26/existential-threat-indigenous-leaders-urge-citigroup-to-stop-backing-amazon-oil/#:~:text=B%20etween%202016%20and%202020%2C%20Citigroup,land%20rights%2C%20the%20report%20found.>

12 <https://amazonwatch.org/news/2024/1016-oil-over-life-the-cost-of-petroperus-environmental-catastrophe-in-the-peruvian-amazon>; <https://amazonwatch.org/assets/files/2022-09-petroperu-risk-assessment.pdf>