

Citi Anti-Bribery & Corruption Disclosure Questionnaire  
(For Non-Employees)

Please respond as fully and accurately as possible to the questions presented below. Any false or incomplete information, misrepresentation, or material omission may affect any offer to be placed on a Citi assignment. The information you provide will be reviewed, maintained, and used within Citi in connection with your pursuit of an assignment with Citi and in accordance with applicable laws. Completion of this questionnaire does not constitute an offer, nor contract of employment with Citi.

Definitions for terminology are included in the Appendix.

1. Do you currently hold, or have you held within the last five years, a position as a Senior Government Official (“SGO”) (e.g., a senior-level person in the government or a senior executive of a government – controlled corporation, institution, or charity)?
- Yes ☐ No ☒

If yes, provide the:

- a. Most recent Job Title: \_\_\_\_\_
- b. Name of the government entity: \_\_\_\_\_
- c. Dates of Service: \_\_\_\_\_ / \_\_\_\_\_  
From (Month / Year) To (Month / Year)
- d. Country/Countries of the government entity: \_\_\_\_\_  
(For public international organizations, please indicate the country in which you are/were employed and that the organization is International)

2. Are you a Referral or Relative of a current Senior Government Official?
- Yes ☐ No ☒

If yes, provide the:

- a. SGO Name: \_\_\_\_\_
- b. Relationship or other connection to the SGO: \_\_\_\_\_
- c. SGO’s most recent job title: \_\_\_\_\_
- d. Name of the government entity of the SGO: \_\_\_\_\_
- e. Dates of the SGO’s service: \_\_\_\_\_ / \_\_\_\_\_  
From (Month / Year) To (Month / Year)

f. Country/Countries of the government entity: \_\_\_\_\_  
(For public international organizations, please indicate the country in which the SGO is employed and that the organization is International)

3. Are you a Referral of a current Senior Commercial Person (“SCP”) (e.g., the Chief Executive Officer, Board of Directors voting member, Chief Financial Officer, Treasurer, investment banker, or an officer managing the investments or transactions for or on behalf of a commercial business organization)?
- Yes ☐ No ☒

If yes, provide the:

- a. SCP Name: \_\_\_\_\_
- b. Relationship or other connection to the SCP: \_\_\_\_\_
- c. SCP’s most recent job title: \_\_\_\_\_
- d. Name of the commercial business organization of the SCP: \_\_\_\_\_
- e. Dates of the SCP’s service: \_\_\_\_\_ / \_\_\_\_\_  
From (Month / Year) To (Month / Year)
- f. Country/Countries of the commercial business organization: \_\_\_\_\_  
(For private international organizations, please indicate the country in which the SCP is employed and that the organization is International):

Name: Ram Kaushal Gurrala

Signature: 

Signed by:

Ram Kaushal Gurrala

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Date: 11/20/2024

## THE CITIGROUP GLOBAL ANTI-BRIBERY & CORRUPTION (AB&C) COMPLIANCE PROGRAM

Citigroup Inc. ("Citi") is committed to conducting business in accordance with the highest ethical standards and in full compliance with all applicable anti-bribery and corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, and the applicable local anti-bribery and corruption laws of the countries in which Citi operates.

One of Citi's core principles is its commitment to responsible finance – conduct that is transparent, prudent, and dependable. Citi's AB&C Program embodies this principle.

Citi has in place written policies, procedures, and internal controls reasonably designed to comply with anti-bribery laws (the "Anti-Bribery & Corruption Compliance Program"). The Anti-Bribery & Corruption Compliance Program includes: oversight and governance; a risk assessment process; communication and training; review and pre-approval processes; due diligence on third party relationships; confidential reporting; financial controls and record-keeping; and independent testing processes.


Bribery and corruption have no place at Citi. Personnel are prohibited from offering, requesting, or accepting bribes and other improper financial advantages:

- Personnel may not provide anything of value to obtain or retain business or any advantage, financial or otherwise. "Anything of value" extends beyond cash to include improper gifts, entertainment, charitable and political contributions, and employment or internships for clients, government officials, or their related persons.
- The prohibition against the provision of anything of value applies not only to government officials and employees or officials of organizations with government ownership or control, but also includes clients, suppliers, and any person with whom Citi does or anticipates doing business. Citi expressly prohibits the provision of facilitation payments.

Citi expects all of its agents and suppliers to act at all times in compliance with applicable anti-bribery and corruption laws and regulations.

Citi reserves the right to immediately terminate any business relationship that violates our high ethical standards and our commitment to responsible finance.

***I have received, read and understand the above Anti-Bribery & Corruption program statement:***

Name:	Ram Kaushal Gurrala
Signature:	<div>Signed by:  F7451D50AC6C48D...</div>
Date:	11/20/2024

## APPENDIX: Definitions

**“Senior Commercial Person” or “SCP”:** is a non-Citi employee of a commercial (i.e., non-governmental) business organization who occupies an influential position within a commercial business organization or makes, or has the ability or authority to make, decisions for or on behalf of a commercial business organization in relation to transactions, assets, funds, and/or direction of a commercial business organization in relation to business with Citi.

For purposes of these Procedures, the following individuals are considered to be SCPs:

- Chief Executive Officer (“CEO”), the deputy of the CEO, or a person with a similar level of management responsibilities and authority, of an organization;
- A voting member of the Board of Directors (whether in an executive or non-executive capacity) of an organization; or
- Chief Financial Officer, Treasurer, investment banker, or an officer managing the investments or transactions for or on behalf of a commercial business organization.

**“Senior Government Official” or “SGO”:** is a Government Official or U.S. Public Official who occupies an influential position within a government entity or makes, or has the ability or authority to make, decisions for or on behalf of a government entity in relation to transactions, assets, funds, and/or direction of a government entity in relation to business with Citi.

This does not include a Government Official or U.S. Public Official in a junior or non-managerial position who does not have influence over any business conducted with Citi. Examples of Government Officials and U.S. Public Officials that generally are not considered SGOs include **non-managerial** police officers, firefighters, correctional officers, postal employees, clerical workers, teachers, librarians, and public transportation employees.

**“Government Official”:** is an elected or appointed official, employee or representative of a non-U.S. government entity (which includes the executive, legislative, administrative, military or judicial branches of a government; a political party; or a government-owned, government-controlled or government-funded corporation, institution or charity) at any level, and may include:

- Government regulators and persons acting in an official capacity on behalf of government regulators;
- Employees of self-regulatory organizations for the financial services industry (even if the self-regulatory organization is not government-sponsored);
- Members of a royal family;
- Officials or public office candidates of any political party;
- Officers, directors or employees of organizations with Government Ownership or Control (as defined below), including:

- Sovereign wealth funds;
- Public pension funds; and
- State owned or controlled organizations, such as hospitals, financial institutions, utility companies and other corporations;
- Officers, directors and employees of educational institutions that are established or operated by a federal, state or local government entity; and
- Officials of public international organizations and persons acting in an official capacity for or on behalf of governments or public international organizations, including, but not limited to:
  - The World Health Organization;
  - United Nations development agencies;
  - International Red Cross;
  - International Monetary Fund; and
  - The World Bank Group.

**“Government Ownership or Control”**: means

- That government ownership equals at least 50% of an entity; or
- Even if government ownership is less than 50%, if the government has actual management and control of an entity, irrespective of the government’s ownership percentage.

**“U.S. Public Official”**: means any person holding either elected or appointed office at the U.S. federal, state, or local level, and his/her staff. This includes officials, directors and employees of regulatory organizations, agencies, authorities, commissions and boards, public employees’ pension funds, and educational institutions that are established or operated by a federal, state, or local Government Entity. In many jurisdictions, the definition includes the official’s or employee’s family.

**“Relative”**: means spouses, domestic partners, civil union partners, parents, grandparents, great-grandparents, children, grandchildren, siblings, aunts, uncles, nieces, nephews, cousins, wards, or equivalent relationships, and any person (other than a tenant or domestic help or employee) who shares the person’s household. Relative also includes “in-laws” and “step” in these same relationships.

**“Referral”**: means an individual recommended for employment or Work Experience at Citi.

## SUPPLIER CHECKLIST

### Background Screening Completion Confirmation

Supplier's Authorized Representative certifies that the background screening requirements outlined within the **Citi Requirements for Suppliers**: <https://www.citigroup.com/global/suppliers/policy-and-standards> including any additional local screening requirements, have been completed for the below named resource.

Supplier's Authorized Representative also understands and agrees that adverse background screening results, no matter when discovered during the Citi assignment, will constitute grounds for denial or termination of assignment with Citi. The Supplier has an obligation to immediately inform Citi, and subsequently remove the resource from assignment, when screening results are adverse.

**The Supplier must complete the checklist below in its entirety for the country where the resource will be assigned and provide it before the Citi assignment starts. Forms with missing fields will not be accepted.**

Supplier:	
Full Name of Resource on Citi Assignment:	Ram Kaushal Gurralla
Country of Assignment:	

Background Check	Status	Date Result Received	Evidence
<b>Identity Verification</b>  <i>Supplier to verify the picture on the ID is a recent picture which can certifiably be used to identify the candidate and that the candidate meets the minimum age requirement for employment in the country which they work in. Supplier must also validate that the candidate photo ID matches the resource who has been engaged through the candidate screening process for onboarding at Citi.</i>			
<b>Criminal Background</b>  <i>Citi will fingerprint resources in the USA except for External Service Providers (ESP).</i>  <i>Supplier to provide criminal background evidence for</i> <ul style="list-style-type: none"> <li>resources working in the USA and classified as External Service Provider</li> <li>resources located outside the USA</li> </ul> <i>"NA" to be used only for countries where criminal background checks are not permitted.</i>			
<b>Bankruptcy Check (Hong Kong only)</b>  <i>Status "NA" is for excluded classifications, such as External Service Providers (ESP).</i>			
<b>Credit Check (Hong Kong only)</b>  <i>Status "NA" is for excluded classifications, such as External Service Providers (ESP).</i>			

***Citi requests that all checks be completed prior to start of assignment. In some cases, we understand that employment and education check may take longer. In these cases, Supplier is required to start the check immediately upon Citi assignment acceptance and complete within 90 days of start. If there is a gap, Supplier is required to notify Citi immediately and end resource’s assignment.***

Background Check	Status (Clear/ Not Clear/ Pending/ N/A)	Date Check Started (must be prior to start of assignment)	Attestation
Education Check			
Employment Check			

*Citi reserves the right to check completeness at will.*

**I attest that the evidence provided has been validated, and is complete and accurate, in line with the country of assignment requirements.**

Full Name of Supplier-Authorized Representative:	
Signature of Supplier-Authorized Representative:	
Title of Supplier-Authorized Representative:	
Date (MM/DD/YYYY):	

## Employment of Relatives Disclosure for Non-Employees

Please respond as fully and accurately as possible to the questions presented below. Any false or incomplete information, misrepresentation, or material omission may affect your placement on a Citi assignment. The information you provide will be reviewed, maintained, and used within Citi in connection with your pursuit of an assignment with Citi and in accordance with applicable laws. Completion of this document does not constitute an offer, nor contract of employment with Citi.

**Non-Employee Name:** Ram Kaushal Gurralla

**Supplier Organization:** \_\_\_\_\_

**Country of Assignment:** \_\_\_\_\_

**Date:** 11/20/2024

1. Do you have any relatives (1) or persons in any other Covered Relationships (2) currently working at Citi (3) whether as regular or temporary full- or part-time employees, and including summer and full-time early career program associates/ analysts or other internships (paid or unpaid), or whether as Contingent Workers (non-employees) (4), and/or who are part of Citi's Senior Management or Board of Directors (5)?

(1) Relatives mean spouses, domestic partners, civil union partners, parents, grandparents, great-grandparents, children, grandchildren, great grandchildren, siblings, aunts, great aunts, uncles, great uncles, nieces, great nieces, nephews, great nephews, first cousins, wards or guardians. Relatives also include in-laws and step-relatives in these same relationships.

(2) Covered Relationships mean non-relatives involved in a consensual (romantic or intimate) relationship, who may or may not currently share the person's household.

Note- Roommates/flat mates, tenants, and domestic helpers who share the person's household are not considered Covered Relationships.

(3) Citi means Citigroup Inc., its subsidiaries and affiliates (including but not limited to Citibank and Banamex).

(4) Contingent Workers means agency temporary workers, contractors or consultants.

(5) Senior Management means Citi's Chief Executive Officer (CEO), members of the Executive Management Team (EMT), direct reports to the EMT (excluding Senior Vice Presidents and below) and Section 16 Officers. The Senior Management and Board of Directors lists are available [here](#) and [here](#) (scroll down and click "Section 16 Report").

Yes

☐

No

☒

If yes, provide the:

- Full name of individual(s): \_\_\_\_\_
- Citi GEID of individual(s) (if known): \_\_\_\_\_
- Relationship or other connection to the individual(s): \_\_\_\_\_
- Name of the Citi Manager/Business Contact of the individual: \_\_\_\_\_
- City & Country where individual works at Citi: \_\_\_\_\_



FINRA

## Citi Non-Employee Regulatory Questionnaire Financial Industry Regulatory Authority (FINRA)

*U.S. securities laws and FINRA's rules provide that no FINRA member firm may associate with a person (including persons located outside the U.S.) engaged in its investment banking or securities business that is, or becomes subject to any "statutory disqualification," as such term is defined in Section 3(a)(39) of the Securities Exchange Act of 1934 (the "Exchange Act"). As set forth in Section 3(a)(39) of the Exchange Act, certain criminal, regulatory events and findings or sanctions imposed by financial regulators will subject a person to statutory disqualification. This questionnaire is designed to assist the Firm and its U.S. broker-dealers in fulfilling their regulatory requirements under applicable U.S. securities laws and FINRA rules in identifying and screening its associated persons for statutory disqualifying events.*

### PLEASE READ THESE INSTRUCTIONS CAREFULLY BEFORE COMPLETING THIS QUESTIONNAIRE.

1. Your completion of this questionnaire is required due to your supporting one of more of Citi's U.S. broker-dealers and pursuant to the Securities Exchange Act of 1934 and rules and regulations promulgated thereunder. 15 U.S.C. § 78a et. Seq., and/or as part of the onboarding protocols of Citi.
2. For any matter that requires a "Yes" answer, you may be required to provide further details to a Citi Compliance and/or Legal contact upon inquiry.
3. Answer all questions completely and accurately. If you are unsure about how to answer a particular question, answer "Yes" to the question and then provide further detail to Citi Compliance and/or Legal upon inquiry.
4. All criminal matters must be disclosed, even if there was a pardon, conditional discharge, post-conviction dismissal after successful completion of a sentence or completion of diversion program, the judgment was vacated, or if the record has been expunged, sealed, expunged, vacated or set aside and even if the matter was a youth or juvenile offense.
  - a. **Note that individuals located in the following listed countries DO NOT complete the Criminal Disclosures section:** Australia, Bangladesh, Belgium, Brazil, Finland, Hong Kong, India, Ireland, Israel, Japan, Kazakhstan, The Republic of Korea, Mauritius, Mexico, Philippines, Poland, Qatar, Russian Federation, Singapore, Spain, Sri Lanka, Taiwan, Thailand, and Uruguay.
5. Underlined words in this questionnaire are defined terms. Their meanings are listed in the Appendix. In addition, whenever the questionnaire discusses "courts," presume the term to include U.S., non-U.S., and military courts.
6. If the information you have provided on this questionnaire changes or is no longer accurate, or a matter that would have required disclosure on this questionnaire occurs after you complete it, new information must be promptly submitted to the Citi Non-Employee Staffing Office partner for appropriate escalation and review.
7. Please contact the Citi Non-Employee Staffing Office if you have any questions concerning the questionnaire.

**Please read the definitions for terminology included in the Appendix.**

FINRA

**For all questions where you have responded “Yes”, please be prepared to provide full details of any action taken against you and disposition of any matter or proceeding upon inquiry from Citi.**

SECTION 1: Regulatory Actions			
#1	Has any domestic or foreign court, any Regulatory Agency ever:		
a	Found you or an entity of which you were a <u>Principal</u> at the time the activities occurred, to have violated or otherwise been involved in a violation of any financial services-related statutes, rules, or regulations or been dishonest, unfair or unethical?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
b	Found you, or an entity of which you were a Principal at the time the activities occurred, to have violated or been involved in a violation of any statute, rule, regulation, or order involving embezzlement, theft, extortion, fraud, fraudulent conversion, misappropriation of funds, securities, or property, forgery, counterfeiting, false pretenses, bribery, gambling, or fraudulent, manipulative, deceptive, dishonest or unfair conduct, or found you to have been unable to comply with any provision of such statute, rule or regulation?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
c	Found you, or an entity of which you were a Principal at the time the activities occurred, to have assisted, aided, abetted, induced, procured, counseled, or commanded <i>another person who violated any financial services-related statutes, rules, or regulations?</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
d	Found you, or an entity of which you were a Principal at the time the activities occurred, to have failed reasonably to supervise another person subject to your supervision and such person was involved in a <i>violation of any financial services-related statutes, rules, or regulations?</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
e	Found you, or an entity of which you were a Principal at the time the activities occurred, to have assisted, aided, abetted, induced, procured, counseled, or commanded another person who was involved in a civil violation involving embezzlement, theft, extortion, fraud, fraudulent conversion, misappropriation of funds, securities, or property, forgery, counterfeiting, false pretenses, bribery, gambling, or fraudulent, manipulative, deceptive, dishonest or unfair conduct?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
f	Found you, or an entity of which you were a Principal at the time the activities occurred, to have failed reasonably to supervise another person subject to your supervision and such person was involved in a civil violation involving embezzlement, theft, extortion, fraud, fraudulent conversion, misappropriation of funds, securities, or property, forgery, counterfeiting, false pretenses, bribery, gambling, or fraudulent, manipulative, deceptive, dishonest or unfair conduct?.	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
g	Found you to have made or caused to be made a false or misleading statement or omission of fact, or been dishonest, unfair or unethical, in connection with any financial services-related activity including, but not limited to, in any (i) application (or any update thereto) for membership or participation in, or to become associated with a financial services-related entity or a Self-Regulatory Organization, or (ii) report required under federal or State securities laws or substantially equivalent foreign laws or the rules of any Self-Regulatory Organization, or (iii) proceeding before the U.S. Securities and Exchange Commission, U.S. Commodity and Futures Trading Commission, any Self-Regulatory Organization, any foreign financial regulatory authority, or any domestic or foreign court, concerning a financial services-related matter?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
h	Found you to be the cause of any disciplinary action, including suspension, expulsion, revocation or an order barring or otherwise restricting or limiting the ability to engage in any financial services-related activities, taken against another person or entity?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

**FINRA**

i	Denied, suspended, revoked, barred or refused you any privileges, memberships, licenses or registrations to engage in financial services-related activity or otherwise prevented you from associating with a financial-services related entity or restricted your financial-related activities?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
j	Denied, suspended, revoked or refused an entity's privileges, memberships, licenses or registrations to engage in financial services-related activity when you were a Principal of the entity, or associated with the entity in any capacity, at the time the activities occurred?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
k	Taken any disciplinary action against an entity of which you were a Principal or with which you were associated at the time, involving denial, suspension, expulsion, or revocation of any privileges, memberships, licenses or registrations?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
l	Permanently or temporarily enjoined you, or an entity of which you were a Principal or with which you were associated at the time, from engaging in financial-services related activities or associating with a financial-services related entity, or from engaging in or continuing any activity where such activity involves embezzlement, theft, extortion, fraud, fraudulent conversion, misappropriation of funds, securities or property, forgery, counterfeiting, false pretenses, bribery, gambling, or racketeering?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
m	Permanently or temporarily enjoined you, or an entity of which you were a Principal, or with which you were associated at the time?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
n	Dismissed, pursuant to a settlement agreement, any financial services-related proceeding, including civil litigation, brought by a Regulatory Agency against you, or an entity of which you were a Principal at the time the activities occurred?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
o	Taken any other disciplinary action against you?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
#2	Have you, or an entity of which you were a Principal at the time the activities occurred, ever been disbarred by any federal agency from contracting with the U.S.?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
#3	Have you ever had your authorization to act as an attorney, accountant or federal contractor revoked or suspended?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
<b>SECTION 2: Pending Investigations or Proceedings by Regulatory Agencies</b>			
#1	Have you been notified in writing that you, or an entity of which you were a Principal at the time the activities occurred, are presently the subject of any investigation by a Regulatory Agency?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
#2	Have you been notified in writing that you, or an entity of which you were a Principal at the time the activities occurred, are presently the subject of any regulatory complaint or proceeding by a Regulatory Agency?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
#3	Are you, or an entity of which you were a Principal at the time the activities occurred, presently the subject of any pending financial services-related investigations or proceedings, including civil litigations that could result in you being enjoined from engaging in any financial services-related or a finding that you were involved in a violation of any financial services-related statute, rule or regulation, or deceptive, dishonest or unfair conduct?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

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	<b>SECTION 3: Bonding and Financial Disclosures</b>		
#1	Has a bonding company ever denied, paid out on, or revoked a bond for you?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
	<b>SECTION 4: Additional Disclosures</b>		
<p><i>For all questions below where you have responded "YES", please be prepared to describe the details of the event, including parties involved, circumstances, case number, allegations/charges, plea, sentencing information and the final disposition to Citi upon inquiry.</i></p> <p><i>It may be necessary for you to produce court documentation that details the allegations; charges; classification of the offense (e.g., felony, misdemeanor); the plea, sentencing and probation information, as applicable; and the final disposition.</i></p>			
#1	Are you personally involved in an issue (such as a party to any action or the subject of pending charges) the resolution of which could result in a "Yes" answer to any of the above questions	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
#2	Have you willfully made any materially false or misleading statement or willfully omitted to state any material fact in any application or report to the <u>Commission</u> , in any proceeding before the <u>Commission</u> or in any registration disqualification proceeding?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
#3	Have you ever had a hearing before the <u>Commission</u> concerning any matter disclosed herein?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
	<b>SECTION 5: Criminal Disclosures</b>		
<p><b>Note that individuals located in the following listed countries <b>DO NOT</b> complete the Criminal Disclosures section:</b></p> <p><b>Are you located in any of the countries listed below?</b>      X <b>Yes</b>      <b>No</b></p> <ul style="list-style-type: none"> <li>Australia, Bangladesh, Belgium, Brazil, Finland, Hong Kong, India, Ireland, Israel, Japan, Kazakhstan, The Republic of Korea, Mauritius, Mexico, Philippines, Poland, Qatar, Russian Federation, Singapore, Spain, Sri Lanka, Taiwan, Thailand, and Uruguay</li> </ul> <p><b>In responding to the questions below, <b>DO NOT</b> include any information on juvenile convictions</b></p>			
#1	Have you personally ever pled guilty, or "no contest" to, or been convicted, or <u>found</u> guilty of any <u>felony</u> ?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

**FINRA**

#2	<p>Have you personally ever pled guilty, or been convicted, or found guilty of any <u>misdemeanor</u> in any court which:</p> <ul style="list-style-type: none"> <li>i. Arises out of conduct related to acting as a futures commission merchant, introducing broker, floor broker, floor trader, commodity trading advisor, commodity pool operator, associated person of any <u>Commission</u> registrant, securities broker, securities dealer, municipal securities broker, municipal securities dealer, transfer agent, clearing agency, securities information processor, investment adviser, investment company or an affiliated person or employee of any of the foregoing;</li> <li>ii. Involves embezzlement, theft, extortion, fraud, fraudulent conversion, forgery, counterfeiting, false pretenses, bribery, gambling, misappropriation of funds, securities or property; or</li> <li>iii. Involves a violation pertaining to: <ul style="list-style-type: none"> <li>▪ A willful failure to file an income tax return, supply information, or pay a tax;</li> <li>▪ Making a fraudulent statement or failing to make a statement to employees;</li> <li>▪ Making a fraudulent withholding exemption certificate or failing to supply information;</li> <li>▪ Filing a fraudulent income tax return, statement or other document; or</li> </ul> </li> <li>iv. Involves a violation pertaining to: <ul style="list-style-type: none"> <li>▪ Concealment of assets; false oaths and claims; bribery;</li> <li>▪ Frauds and swindles;</li> <li>▪ Fictitious names or addresses;</li> <li>▪ Fraud by wire, radio, or television;</li> <li>▪ Counterfeiting and forgery;</li> <li>▪ Fraud and false statements;</li> <li>▪ Racketeering;</li> <li>▪ Racketeer-influenced and corrupt organizations; OR</li> </ul> </li> <li>v. Involves any transaction in or advice concerning swaps, futures, options, leverage transactions or securities.</li> </ul>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
#3	<p>Have you personally been <u>found</u> in a proceeding brought by the <u>Commission</u>, <b>any court</b>, any Federal or State agency <b>or other governmental body</b> (or by settlement, consent decree or other agreement to which one of the foregoing is a party) to have:</p> <ul style="list-style-type: none"> <li>▪ Violated any investment-related statute; or</li> <li>▪ Violated any statute or any rule, regulation or order thereunder which involves embezzlement, theft, extortion, fraud, fraudulent conversion, misappropriation of funds, securities or property, forgery, counterfeiting, false pretenses, bribery, or gambling; or</li> <li>▪ Willfully assisted, aided, abetted, counseled, commanded, induced, or procured a violation (as described in the preceding two bullet points) by another person?</li> </ul>	Yes <input type="checkbox"/>	No <input type="checkbox"/>

FINRA

SECTION 6: Provision of General Information & Employment History (10 years)

Citi is subject to industry regulations that require the firm to maintain certain records regarding personnel (including non-employees), such as other names the individual may use (or used in the past) and 10 years of employment history.

(I) GENERAL INFORMATION:

First Name:

Ram Kaushal

Last Name

Gurrala

Additional Names(s) Associated  
With or Used/Aliases:

Full Current Address:

Modern View Apartment Flat S-F, Chinnapanahalli, Bangalore, 560037

Initial  
RKG

(II) EMPLOYMENT HISTORY:

Please provide all periods of employment, including military service for the last 10 years. Start with your previous position prior to Citi assignment. Please account for the past 10 years (with the exception of periods less than three months), even if not “employment”. For example, include “Student”, “Homemaker”, “Unemployed” or appropriate explanation, where applicable.

Refer to Appendix II to complete the 10 year job history if it cannot be documented fully in the sections below.

Number	Name of Company	Dates of Employment		Position Role	Full or Part Time
		From (MO/YR)	To (MO/YR)		
#1	Ernst & Young LLP	Month: September Year: 2024	Month: November Year: 2024	Consultant	Full Time
#2	MuSigma Business Solutions	Month: July Year: 2021	Month: August Year: 2024	Trainee Decision Scientist	Full Time
#3	Student	Month: June Year: 2017	Month: June Year: 2021	B-Tech	Full Time
#4	Student	Month: May Year: 2015	Month: May Year: 2017	Intermediate	Full Time
#5	Student	Month: April Year: 2014	Month: April Year: 2015	Matriculation	Full Time

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#6		Month: Year:	Month: Year:		
#7		Month: Year:	Month: Year:		
#8		Month: Year:	Month: Year:		
#9		Month: Year:	Month: Year:		
#10		Month: Year:	Month: Year:		
#11		Month: Year:	Month: Year:		
#12		Month: Year:	Month: Year:		
#13		Month: Year:	Month: Year:		
#14		Month: Year:	Month: Year:		
#15		Month: Year:	Month: Year:		
#16		Month: Year:	Month: Year:		
#17		Month: Year:	Month: Year:		
#18		Month: Year:	Month: Year:		
#19		Month: Year:	Month: Year:		
#20		Month: Year:	Month: Year:		
#21		Month: Year:	Month: Year:		
#22		Month: Year:	Month: Year:		

I confirm I have provided the full 10 year work history with all gaps greater than 3 months accounted for.

☒

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RKG

As per Citi Requirements for Supplier, Supplier Representative has initiated employment history check and compared the resource's resume to the FINRA employment history and is attesting to accuracy and completeness of the FINRA form. FINRA employment history must account for 10-years work history and no gap greater than 3 months.

☐

Yes

No

FINRA

BY COMPLETING AND SIGNING THIS FORM, YOU CERTIFY THAT YOUR ANSWERS ARE TRUE, COMPLETE AND ACCURATE, AND THAT YOUR ANSWERS AND STATEMENTS ARE NOT MISLEADING IN ANY MATERIAL RESPECT. YOU ALSO AGREE TO NOTIFY CITI PROMPTLY OF ANY CHANGES.

Signature:

Signed by:

Ram Kaushal Gurrata

F7451D50AC6C48D...

Supplier Organization:

Date (MM/DD/YY):

11/20/2024



FINRA

## APPENDIX I: Definition of Terms

**ADJUDICATION:** in a criminal case, a determination by the court that the defendant is guilty or not guilty.

**CHARGE:** A formal complaint, information, indictment or equivalent instrument containing an accusation of crime.

**COMMISSION:** The U.S. Commodity Futures Trading Commission.

**ENTITY:** Any person (e.g., a corporation, partnership, limited liability company, trust, etc.) other than an individual.

**FELONY:** Any crime classified as a felony and for states and countries that do not differentiate between a felony and misdemeanor, an offense that could result in imprisonment for any period of more than one year. The term also includes a general Courts-Martial.

**FOUND:** means a determination that a conduct or rule violation has occurred. The term includes adverse final actions, including but not limited to, orders, acceptance waiver and consents, consent decrees, consent orders, stipulations, settlements in which the findings are neither admitted nor denied, judgements, permanent or temporary enjoinders, injunctions, and cease and desist orders.

**FINANCIAL SERVICES RELATED:** is defined as pertaining to securities, commodities, futures, swaps, security-based swaps, banking, insurance, consumer lending, or any other business or instrument subject to regulation under a financial services-related statute, rule or regulation (as defined below).

**FINANCIAL SERVICES-RELATED STATUTE, RULE OR REGULATION:** is defined as any law or regulation pertaining to financial services related activities and includes, without limitation, the Commodity Exchange Act [7 U.S.C. § 1 et seq.], the Securities Act of 1933 [15 U.S.C. § 77a et seq.], the Securities Exchange Act of 1934 [15 U.S.C. § 78a et seq.], the Public Utility Holding Company Act of 1935 [15 U.S.C. § 79 et seq.], the Trust Indenture Act of 1939 [15 U.S.C. § 77aaa et seq.], the Investment Advisers Act of 1940 [15 U.S.C. § 80b-1 et seq.], the Investment Company Act of 1940 [15 U.S.C. § 80a-1 et seq.], the Securities Investors Protection Act of 1970 [15 U.S.C. § 78aaa et seq.], the Foreign Corrupt Practices Act of 1977, chapter 96 of Title 18 of the United States Code, or any similar statute of a State (as defined below) or foreign jurisdiction, or any rule, regulation, or order under any such statutes, the rules of the Municipal Securities Rulemaking Board, or any rule or regulation of any Self-Regulatory Organization (as defined below).

**INVESTIGATIONS:** include any financial services related investigation by any "Regulatory Agency" (as defined below).

**PRINCIPAL** means an individual:

1. Who is sole proprietor, a manager, officer, general partner or a person in charge of a business unit, division; or function of a corporation, limited liability company or limited liability partnership; or
2. An individual who directly or indirectly, through agreement, holding companies, nominees, trusts or otherwise is the owner of or controls by voting 10% or more of the outstanding shares of any class of an entity's equity securities, other than non-voting securities.

**PROCEEDING:** includes a formal administrative or civil action initiated by a "Regulatory Agency" (as defined below).

**REGULATORY AGENCY:** includes any federal or State (as defined below) agency, foreign financial regulatory authority or Self-Regulatory Organization (as defined below) that administers or enforces financial services-related statutes, rules or regulations (as defined above) including but not limited to, the U.S. Securities and Exchange Commission, U.S. Commodity and Futures Trading Commission, U.S. Comptroller of the Currency, U.S. Board of Governors of the Federal Reserve System, U.S. Federal Deposit Insurance Corporation, U.S. Office of Thrift Supervision, National Credit Union Administration, any State (as defined below) securities commission (or any agency or office performing like functions), any State (as defined below) authority that supervises or examines banks, savings associations, or credit unions, any State (as defined below) insurance commission (or agency or office performing like functions), or any Self-Regulatory Organizations (as defined below).

## FINRA

**SELF-REGULATORY ORGANIZATION:** includes, but not limited to, any national securities or commodities exchange, any national securities association (e.g., FINRA), any registered futures association (e.g. National Futures Association), any registered futures contract market, any registered clearing agency, or any foreign or international securities exchange or futures association.

**STATE:** means a state, District of Columbia, the Commonwealth of Puerto Rico, the U.S. Virgin Islands or any subdivision or regulatory body thereof.

## INVESTMENT-RELATED STATUTES:

1. The CEA (regulating the trading of, advice as to, and funds that invest in, commodity futures, options and swaps in the U.S.);
2. The Securities Act of 1933 (regulating the disclosure of information as to companies and securities in connection with a public sale of such securities in the U.S.);
3. The Securities Exchange Act of 1934 (regulating financial market intermediaries (brokers, dealers, exchanges) and various disclosure and governance requirements by corporations that are listed on a U.S. exchange, or broadly held by U.S. investors);
4. The Public Utility Holding Company Act (regulating the ownership and control of electric and natural gas utility companies in the U.S.);
5. The Trust Indenture Act of 1939 (regulating the content of trust indentures governing debt securities that are offered for public sale in the United States);
6. The Investment Advisers Act of 1940 (regulating the activities of persons and firms that provide professional advice as to trading in, or the value of, securities investments in the U.S.);
7. The Investment Company Act of 1940 (regulating the activities of companies, including mutual funds, that primarily engage in investing and trading in securities in the U.S.);
8. The Securities Investor Protection Act of 1970 (regulating the liquidation of insolvent securities broker-dealers);
9. The Foreign Corrupt Practices Act of 1977 (regulating the bribery of foreign officials and related accounting and recordkeeping practices in the U.S.);
10. Chapter 96 of Title 18 of the United States Code (relating to racketeer influenced and corrupt organizations);
11. Any similar statute or law of a State or of a foreign jurisdiction;
12. Any rule, regulation or order under any such statutes or laws; and
13. The rules of the Municipal Securities Rulemaking Board (e.g., investor protection rules securities firms and banks must follow when advising investors and engaging in municipal securities transactions).

**MISDEMEANOR:** Any crime classified as a misdemeanor and for states and countries that do not differentiate between a felony and misdemeanor, an offense that could result in imprisonment for any period of at least six days but not more than one year. By way of example, an offense for which the maximum period of imprisonment is 60 days would be considered a misdemeanor. The term also includes a special court martial.

**NFA:** The National Futures Association.

**PERSON:** An individual, association, partnership, corporation, limited liability company, limited liability partnership, trust, or other form of business organization.

**SELF-REGULATORY ORGANIZATION (SRO):** A private, non-governmental organization authorized to set and enforce standards of permissible conduct for an industry. NFA, FINRA (formerly known as NASD) and the securities and futures exchanges in the U.S. are examples of domestic SROs.

## U.S. PERSON:

- i. Any natural person who is a resident of the United States;
- ii. A corporation, partnership, limited liability company, business or other trust, association, joint-stock company, fund or any form of enterprise similar to any of the foregoing, in each case that is either
  - a. Organized or incorporated under the laws of a state or other jurisdiction in the United States, or
  - b. Effective as of April 1, 2013, any entity having its principal place of business in the United States. Funds and other collective investment vehicles are excluded from this clause (B) of the U.S. person definition.
- iii. A pension plan for the employees, officers or principals of a legal entity described in (ii) above, unless the pension plan is primarily for foreign employees of such entity;

**FINRA**

- iv. An estate of a decedent who was a resident of the United States at the time of death, or a trust governed by the laws of a state or other jurisdiction in the United States if a court within the United States is able to exercise primary supervision over the administration of the trust; or
- v. An individual account or joint account (discretionary or not) where the beneficial owner (or one of the beneficial owners in the case of a joint account) is a person described in (i) through (iv) above.

Note: This definition is based on the **Commission's** Final Exemptive Order and the definition of "U.S. Person" may be amended when the **Commission** issues its Final Cross-Border Guidance.

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APPENDIX II:  
Additional Job History

Please utilize the fields below to provide additional job history if needed:

Number	Name of Company	Dates of Employment		Position Role	Full or Part Time
		From (MO/YR)	To (MO/YR)		
#23		Month: Year:	Month: Year:		
#24		Month: Year:	Month: Year:		
#25		Month: Year:	Month: Year:		
#26		Month: Year:	Month: Year:		
#27		Month: Year:	Month: Year:		
#28		Month: Year:	Month: Year:		
#29		Month: Year:	Month: Year:		
#30		Month: Year:	Month: Year:		
#31		Month: Year:	Month: Year:		
#32		Month: Year:	Month: Year:		
#33		Month: Year:	Month: Year:		
#34		Month: Year:	Month: Year:		
#35		Month: Year:	Month: Year:		



## NOTICE TO NON-EMPLOYEE OF CITI POLICIES

***Supplier Representatives are responsible for the provision of this information to each personnel assigned to provide services for, or on behalf of Citi.***

You are employee of, or an independent contractor providing services subcontracted to you by \_\_\_\_\_ (“Supplier”), which is providing Services to Citigroup Inc. or one of its affiliates or subsidiaries (“Citi”) pursuant to a Work Order (or Statement of Work) executed between Supplier and Citi, entered into under the Master Services Agreement, effective as of [ ], executed between [ ], for and on behalf of its function-specific subsidiaries, and Citi, as amended on various dates (the Work Order together with the Master Services Agreement, the “Agreement”). All capitalized terms used but not defined herein shall have the meaning ascribed to them in the Agreement.

In connection with your services to Citi, either Citi or its designated agent has provided you with copies of the following materials in connection with your review of, and agreement to, this Notice to Non-Employee of Citi Policies (this “Notice”):

- The Citi Code of Conduct
  - [https://www.citigroup.com/citi/investor/corporate\\_governance.html#code-of-conduct](https://www.citigroup.com/citi/investor/corporate_governance.html#code-of-conduct)
- The Supplier Representative Export Compliance Attestation
- Privacy Statement
  - <https://www.citigroup.com/global/suppliers/policy-and-standards> (collectively, the “Related Materials”).

Citi is a highly regulated company with business lines that operate within the banking and securities industries. Certain laws and regulations may prohibit individuals who have or are currently engaged in certain types of behavior from performing services for or on behalf of companies in the banking and securities industries, such as Citi.

As a condition of your being permitted to perform any services for, or on behalf of Citi, you must comply with all such corporate policies and procedures, whether they are implemented throughout Citi or are specific to the Citi facility or business unit where the services are performed, and as they may be changed from time to time by Citi, as well as with the laws and regulations of all countries in which Citi conducts operations (“applicable laws”).

### ACCORDINGLY, YOU ARE HEREBY PUT ON NOTICE OF CITI’S POLICIES AS FOLLOWS:

- 1. Non-Employee Status.** You are not an employee of any Citi entity and your performance of services for, or on behalf of, Citi, and/or your compliance Citi policies do not constitute employment or any promise of employment with Citi.
- 2. Code of Conduct.** In performing services for Citi, you must comply with the Code of Conduct that is provided in the Related Materials and otherwise act in accordance with the highest standards of personal and professional integrity in all aspects of your activities, including (without limitation) those specifically set forth in Citi’s Code of Conduct that is provided in the Related Materials. You also must comply with all applicable laws, rules, regulations and Citi policies.
- 3. Confidential Information.** At all times while performing services for, or on behalf of Citi and thereafter, you will keep confidential and will not without advance written approval use, reproduce, remove or transmit, or otherwise disclose, either directly or indirectly, to any unauthorized individuals, including (without limitation), any Citi employee, non-employee worker or other third party, any personal, proprietary, confidential and/or secret information of Citi, including (without limitation) information about Citi or its business, products and services, methods, systems, and business plans, and information (including personal information) about any of its current, former or prospective



employees, non-employee workers, clients, vendors and business partners (individually and collectively, "Confidential Information").

Confidential Information as used herein includes (without limitation) pricing information, trading strategies, trade secrets, customer information, analytic models, banking transactions, account activity, new products in development, internal reports, any proprietary or licensed software, and "internal non-public information" under the federal securities laws of the United States, and other applicable laws.

You have an obligation to comply with Citi's Information Security Standards and to safeguard Confidential Information, regardless of its form, including to protect it from misuse by third parties; not to disclose it to any unauthorized person; not to use it or permit it to be used for any unauthorized purpose; to collect, use, access, maintain, transport, transmit, and disclose it only for the performance of your assigned job duties in connection with your performing services for, or on behalf of, Citi; and to appropriately dispose of it in accordance with Citi policy. You acknowledge that in the course of performing Services to Citi you may come across Confidential Information that is subject to domestic and foreign applicable laws. You have the obligation to comply with, and not cause Citi or the Supplier to violate, applicable laws on bank secrecy, confidentiality, and data privacy, applicable to Supplier in the performance of the Services.

Upon the termination of your performing services for, or on behalf of, Citi for any reason, you will not disclose, use, retain or take with you any Confidential Information and will return immediately to Citi all Confidential Information and other Citi property and will not keep copies or duplicates (in any medium) of any of those items. You will return all means of access to Confidential Information as well as return all Citi property, including but not limited to all ID cards, keys, telephone cards, credit cards, laptops, One Time Password (OTP) tokens (e.g., SafeWord cards), cellular phones, PDAs, blackberries, fax machines, and any other means of accessing such information. Further, you may not and will not forward such information to your home computer, your personal email address, or to any third party service provider or server or other non-Citi website, or engage in any other unauthorized use, misappropriation, or disclosure of such information.

Without limiting the generality of the foregoing, you are advised that, under federal securities laws of the United States, and other applicable laws, Citi policies and procedures prohibit any person or entity from (i) trading any securities (including stocks, bonds, options or any other securities) when such person or entity has material non-public information about such securities or (ii) disclosing such information to any other person or entity; and, further, that if you violate such laws you may be subject to criminal prosecution, civil suits, imprisonment and/or significant fines.

Nothing contained in this Notice is intended to prohibit or restrict you or Citi from providing evidence or other information to any government, regulatory, or self-regulatory agency such as (without limitation) the Securities and Exchange Commission ("SEC"), the Commodity Futures Trading Commission ("CFTC"), The Department of Justice ("DOJ"), and the Financial Industry Regulatory Authority, Inc. ("FINRA"), or from responding to any court order or subpoena, or from participating in any reward program offered by any government, regulatory, or self-regulatory agency. You may also disclose confidential information, including trade secrets, to (a) any government, regulatory, or self-regulatory agency, including under Section 21F of the Securities and Exchange Act of 1934 and Section 23 of the Commodity Exchange Act of 1934 and the rules thereunder, or under Section 7 of the Defend Trade Secrets Act of 2016 ("Defend Trade Secrets Act") or (b) an attorney in connection with the reporting or investigation of a suspected violation of law or to an attorney or in a court filing under seal in connection with a retaliation or other lawsuit or proceeding, as permitted under the Defend Trade Secrets Act. You do not need the prior authorization of Citi to make these disclosures or provide evidence or other information to any government, regulatory, or self-regulatory agency, and you are not required to notify Citi that you have done so

**4. Electronic Communications Equipment and Services.** To the extent you are provided access to any Citi electronic communications equipment, services, or facilities (including, without limitation, any technology, telephones, facsimile services, voice mail, computers, laptops, pagers, PDAs or Blackberries, email, intranet, Internet access, text and instant messaging and, other electronic communications tools, devices, data links and data services for on-site, mobile or remote use) (individually and collectively, "Electronic Communications Equipment and Services") in order to perform services for Citi, Citi will have the right to monitor, record, limit, review, modify or terminate such access for any reason permitted by applicable law. Except as may be prohibited by applicable law, all communications, information, data, files, or click stream data that you create, send, receive, download, store, transmit, delete, or use while using Electronic Communications Equipment and Services are the property of Citi and may be used by Citi for any purpose. This includes any personal communications you send or receive through Electronic Communications Equipment and Services.



Citi may, in its discretion and consistent with applicable law, intercept, monitor, record, inspect, copy, access, or disclose (collectively, "monitor") any or all of your activities and/or communications while using Electronic Communications Equipment and Services, whether on or off site (including remote work). This includes deleted e-mails and e-mails or other information stored on a computer hard drive. Monitoring may be periodic, random, or continuous.

Since you use of Electronic Communications Equipment and Services is always subject to monitoring as permitted by applicable law, you should have, to the extent allowed by such applicable law, no expectation of personal privacy when you use Electronic Communications Equipment and Services for any reason, including for personal use. To the contrary, you are on notice that, as allowed by applicable law, your use of Electronic Communications Equipment and Services will likely be monitored in the normal course of business. Any improper or unauthorized use, removal, or theft of Electronic Communications Equipment and Services may result in the immediate termination of your services to, or on behalf of, Citi and/or criminal prosecution.

Further, you are hereby advised:

- (a) You may and will use Electronic Communications Equipment and Services to perform services for Citi and not for any purpose other than the legitimate business purposes of Citi, and you understand that personal use of Electronic Communications Equipment and Services, if any, must be very limited and must otherwise comply with the standards set forth in this Compliance Agreement. You specifically understand and agree that you may not use Electronic Communications Equipment and Services for any improper use, including (without limitation) (i) the downloading, transmission, storage or communication of content consisting of threats to safety of persons or property, unauthorized use or misuse of Confidential Information or ethnic slurs, racial epithets, hate speech, sexually explicit material, obscenities or anything else that may be construed as inappropriate, harassing or offensive to others based on an individual's race, color, national origin, nationality, citizenship, creed, religion, gender, gender identity or expression, sexual orientation, marital status (including domestic partnership and civil unions as defined and recognized by applicable law), veteran status, age, disability, culture, ancestry, socioeconomic status or any other characteristic or status protected by law or Citi policy; or (ii) accessing any website, "chat room" or the like that includes any of the foregoing content, including (without limitation) pornography, off-color jokes, or hate speech.
- (b) You may not and will not transfer any access rights entrusted to you to any other individual.
- (c) You may not and will not attempt to obstruct, hamper, or obtain access to any Citi system, program or data other than for a legitimate purpose related to your performing services for, or on behalf of, Citi and only through the access granted to you by Citi in writing.

**5. Background Check.** In connection with your performing services for, or on behalf of Citi, Citi may, as permitted by applicable law, require that you satisfactorily pass a criminal background check as a condition to performing such services. If you refuse to cooperate in such background check or do not pass it satisfactorily, you will not be permitted to perform any services for, or on behalf of, Citi in any capacity. Without limitation to the foregoing, you will specifically disclose to Citi in writing:

- (a) Any instance in which you were expelled, barred, enjoined, or prohibited from participating in the securities industry;
- (b) Any instance in which you were convicted of, pled guilty or nolo contendere (no contest) to, or participated in any pre-trial diversion for, any felony or misdemeanor involving any crime of dishonesty, breach of trust or money laundering, including (without limitation) any of the following:
 

• The purchase or sale of a security	• Burglary
• Theft	• Perjury
• Possession or use of stolen property, including stolen credit cards	• Making a false statement to a Government official, law enforcement officer, or while under oath
• Forgery or Counterfeiting	• Robbery
• Bribery	• Extortion
• Embezzlement	• Conspiracy
• Illegal manufacture, sale, distribution of, or trafficking in, a controlled substance	• Fraud



Supplier's Authorized Representative is expected to and will notify your Citi-designated business contact if, during the time period that you are performing services for, or on behalf of, Citi, you are arrested for, or charged with, any crime of dishonesty, including those listed above.

**6. Fraud.** Citi has a zero-tolerance policy towards fraud, the misappropriation of assets, service or benefits, the misrepresentation of financial condition, or any other dishonest or unlawful act. Each non-employee must take all required and reasonable measures to prevent, detect, notify and escalate possible fraudulent activity. In addition, all non-employees are expected to conduct Citi business and operations in accordance with the highest standards of ethical conduct as described in the Citi Code of Conduct.

**7. Personal Accounts.** In performing services for Citi, you may have access to certain Citi accounts, but you are not permitted to access your account(s), or the account(s) that you know or believe to belong to any member of your family or of any co-workers, nor if access is provided, to make any changes whatsoever to any such accounts, including, without limitation, changes to name, address, credit limit, status code changes or notes. Any activity that may create a perceived conflict of interest is prohibited. The following rules (as they may be updated or amended by Citi at any time with written notice to Supplier) shall apply to your account access, and your violation of these rules may lead to the immediate termination from your performing services for, or on behalf of, Citi. Accordingly, you are advised that you must:

- (a) Advise your Citi-designated business contact if you find your account or an account that you know or believe to belong to any family member in your queue, so as to have the account moved appropriately;
- (b) Contact Customer Service in any instance where you might need or want to change the name and address or the telephone number on your account or an account that you know or believe to belong to a family member or co-worker.
- (c) Report to your Citi-designated business contact immediately if you come across an account that you know or believe to belong to a Citi employee or any co-worker in the course of your work.

**8. Brokerage Accounts for Designated Non-Employees.** To the extent allowed by applicable law, Citi requires the disclosure and review of activity within a "Covered Account" of all Designated Non-Employees ("DNE"). A DNE is defined in Citi's Personal Trading and Investment Policy (PTIP) and can include, but is not limited to, contractors, consultants and secondees designated as Citi Access Persons and/or working for areas considered Private-side business functions that create, receive, have knowledge of, or obtain access to, non-public information. The PTIP defines a "Covered Account" as one in which a DNE and/or his/her "Related Persons" has the power to effect or the ability to influence trading or investment decisions (i.e. brokerage accounts), either directly or indirectly. In the event that you are classified as a DNE in your position at Citi, and an active waiver has not been granted to your employer, by Compliance, to the extent set forth in the Agreement, you will be expected to sign into the Compliance For You (CoFY) system and complete the Onboarding process by disclosing all covered accounts and you are also required to comply with all other policies requirements that apply to you (e.g., submission of the Annual Certification). Many PTIP requirements are time sensitive, you are required to complete all requirements within the defined timeframe.

**9. Personal Data.** You are advised that Citi may be provided certain information by you, or by your assigning employer, that could be used (either directly or indirectly) to identify you, including (without limitation) your name, national identification number, and certain contact information such as your office address, e-mail address, phone/cell numbers, etc. (individually and collectively, "Personal Data") as stated on the [Privacy Statement](#). In addition, you are advised that Citi maintains computer systems in data centers and at other locations in various countries throughout the world, and that Citi and its affiliated companies may collect, store, process, disseminate or use your Personal Data in a manner that causes it to be transferred or accessed from computer systems owned or operated by, or on behalf of Citi or its affiliated companies throughout its global computer network. By agreeing to provide services to Citi you consent to, subject to applicable law, Citi's collection, storage, processing, dissemination or use, and destruction of your Personal Data for all legitimate business purposes, including (without limitation) those relating to your performing services for or on behalf of Citi or its administration of applicable policies or its vendor management program.





**10. Export (with Specific Obligations for Foreign Nationals).** You have been provided with, and are expected to read and complete, the Supplier Representative Export Compliance Attestation. You will comply with all laws and regulations of all countries that regulate the importation or exportation of goods and technologies and, in particular, to comply with the Export Administration Regulations of the United States as they pertain to any technical data, computer software, or any product (or any part thereof), process, or service that is the direct product of any such technical data or computer software (collectively and individually, “Export Controlled Products”) to which you have access while engaged by Citi.

**11. Equitable Relief.** Without limitation to any of the foregoing, you are advised that any breach or threatened breach of the policies set forth in this Notice will subject Citi to immediate and irreparable harm, and, in addition to any other remedies, Citi shall be entitled to obtain equitable relief in the form of a temporary restraining order, temporary or permanent injunction, or any such other equitable remedy which may then be available. In addition to any other remedies in law or equity Citi may have, in the event that you breach any of the terms set forth herein, your performance of services for or on behalf of Citi may be terminated immediately.

Personnel	
Names of Supplier Personnel:	ID of Personnel (last 4 digits only):
Ram Kaushal Gurrala	6852

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REG

You, the undersigned Supplier Authorized Representative have provided each Personnel with a copy of this Notice and the Related Materials. Supplier hereby certifies that each Personnel shall comply with the principles and policies outlined in this Notice and the Related Materials, where applicable, including any amendments made by Citi and agreed to by Supplier, and other Citi policies and procedures which may be provided by Citi in writing, in each case, subject to the terms of the Agreement.

Signature of Supplier-Authorized Representative:

Name/Title of Supplier-Authorized Representative:

Date:



Supplier Representative Export Compliance Attestation

As a condition for your personnel being engaged on assignment by Citigroup, Inc. or one of its subsidiaries (collectively “Citi”), all staff working within the U.S. and outside the U.S. are required to comply with the requirements of U.S. and non-U.S. export control laws, particularly the U.S. Export Administration Regulations (EAR).

The EAR prohibits the disclosure, exportation, re-exportation, or transfer of any Export Controlled Products: (i) to any country, or to any citizens or residents of any country, that is included within Country Group E (Cuba, Iran, North Korea, and Syria) on Supplement No. 1 to 15 CFR Part 740 (“Supplement 1”), or (ii) to the Crimea, Donetsk People’s Republic (DNR), or Luhansk People’s Republic (LNR) regions of Ukraine or to any residents of the Crimea, DNR, or LNR regions of Ukraine.

Your personnel shall not disclose, export, re-export or otherwise transfer any Export Controlled Products without having first verified that Citi has U.S. export control authorization.

You attest to advise your personnel, that their failure to comply with the prohibitions and limitations of the EAR will expose them and Citi to civil and criminal penalties, including monetary fines, imprisonment, and other penalties. You understand that the personal information requested below is being collected only to assist Citi in complying with U.S. export control laws. Depending on the information provided, there may be further steps that Citi will take to ensure compliance with such laws.

You confirm that your personnel consent to the disclosure of the information provided below by Citi to U.S. government officials for the purposes of complying with U.S. export control laws.

Is your personnel a citizen or a resident of Cuba, Iran, North Korea, Syria or the Crimea, Donetsk People’s Republic (DNR), Luhansk People’s Republic (LNR) regions of the Ukraine:                    Yes ☐ No ☐

If you selected yes above, the following fields must be filled out:

Nationality and/or Residency Status:

a)

Countr(ies) of Citizenship:

Date (MM/DD/YY):

Date (MM/DD/YY):

b)

Permanent Resident of:

Date (MM/DD/YY):

**Supplier certifies that their personnel has been advised of the Export Compliance information above, and the citizenship disclosure provided above is accurate.**

Supplier Organization:	
Name of Supplier HR Representative who validated citizenships:	
Name of Supplier’s Personnel:	Ram Kaushal Gurrala
Citi GEID (if available):	No

Signature of Supplier-Authorized Representative

Name/Title of Supplier-Authorized Representative

Date (MM/DD/YYYY)



## Work-Authorization and Employer Attestation

Supplier:	
Name of Supplier's resource:	Ram Kaushal Gurralla
Citi GEID (if available):	No
Country of work location:	
Is the resource a citizen of the country of work location?	
If No, Is the resource's work location at a Citi office?	
If yes, Supplier certifies it has completed the requirements for the resource to work at the Citi site location as a foreign national.	
Supplier certifies, represents, and warrants that the identity of the above-named resource has been validated and have verified that the resource is authorized to work in the country where they are assigned, and that Supplier has complied with all applicable laws and regulations to verify employment eligibility. Supplier has ensured that the resource is otherwise in compliance with all applicable immigration laws and regulations and that the resource holds the appropriate classification of visa for the assignments and activities in which they are engaged.	
Address of Citi office or Supplier location where the resource provides Services:  <b>Note: Supplier locations must be authorized supplier locations in CASP+ (Citi Approved Supplier Program). If the resource is a Telecommuter, please enter "Telecommuter".</b>	
Is the resource directly employed by Supplier?	
If No, please list the name of the supplier who employs the resource.  Supplier certifies this is the only supplier as part of this relationship.	

Initial  
RKG

If the resource is employed by a subcontracting firm / 4<sup>th</sup> party, the following is needed:

- The SOW must state this subcontractor is permitted.
- Supplier representative is responsible for identifying the resource as a sub-contractor in Fieldglass when creating the Work Order. If the Staffing Office is creating the work order, the supplier representative must identify the resource as a sub-contractor on the onboarding template.
- Supplier is responsible for making sure that the subcontracting supplier has completed all requirements to confirm this resource is able to work in the country.

Suppliers authorized representative certifies that he/she understands that subcontracting is not permitted unless the above conditions have been met.


For more detail on Citi's policies outlined for suppliers, please refer to the Citi Requirements for Suppliers found using this link <https://www.citigroup.com/global/suppliers/policy-and-standards>

Supplier further certifies that the information provided above is accurate.

\_\_\_\_\_  
Signature of Supplier-Authorized Representative

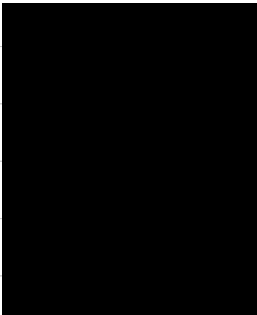
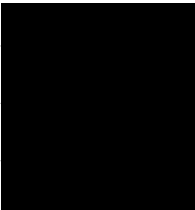
\_\_\_\_\_  
Name/Title of Supplier-Authorized Representative

\_\_\_\_\_  
Date








भारत गणराज्य / REPUBLIC OF INDIA			
टाईप / Type	कोड / Code	राष्ट्रियता / Nationality	पासपोर्ट न. / Passport No.
P	IND	भारतीय / INDIAN	[REDACTED] 1017
	उपनाम / Surname		
	GURRALA		
	दिया गया नाम / Given Name(s)		
	RAMKAUSHAL		
	[REDACTED]		
	जारी करने का स्थान / Place of Issue		
	VIJAYAWADA		
	जारी करने की तिथि / Date of Issue	समाप्ति की तिथि / Date of Expiry	
	02/08/2021	01/08/2031	

# I. Personal Details

The following information was obtained from the details provided by the candidate under candidate information form:

Particulars	
Name of the candidate	Ram Kaushal Gurrala
EY reference number	
Client name	
Client reference number	
Package Name	
Date of birth	
Date of case initiation	
Date of report	Oct 11, 2024
Recruiter Name	
SPOC Name	
Report type	
Final color code	

Color code index

Colour Code	Title
	Discrepant
	Possible Discrepant
	Unable to Check
	Clear
	Insufficient
	Stop
	Blue



B. Civil & Criminal Record Check

B.1 Permanent Address

[Go to Summary Page](#)

Particulars	Information Provided	Search Results
Address Line 1	<div></div>	<div></div>
Address Line 2		
City		
State		
Country		
Pincode		
Start Date		
End Date		Oct 08, 2024
Jurisdiction		All India Courts
Supreme Court Records		No Record Found
High Court Records		No Record Found
District Court Records		No Record Found
Civil Court Records		No Record Found
Magistrate Court Records		No Record Found
Sessions Court Records		No Record Found
Mode of Closure		Digital
Date of Closure		Oct 08, 2024
Findings	No records were identified for candidate name, father name and address (to the extent available in public records) on the e-court record searches as per the agreed search criterion.	
Annexures	<a href="#">B.1 Permanent Address</a>	
Severity	Clear	

