

Environmental Social Governance Report 2023

Contents

Introduction	3
Message From Our Chairman and CEO	4
About This Report	6
About Citizens Financial Group	6
2023 Highlights	8
Summary of Citizens’ Sustainability Announcement	9
Our Approach	10
Stakeholder Engagement	12
Leading With Robust Corporate Governance	13
Board Governance	14
Shareholder Engagement	15
Executive Compensation	15
Business Conduct and Ethics	16
Enterprise Risk Management	17
Privacy and Personal Information Protection	18
Cybersecurity	19
Fraud Prevention	20
Political Engagement	20
Supply Chain Management	20

Driving Positive Climate Impact	21
Partnering With Our Clients	22
Understanding and Managing Climate-Related Risks	24
Reducing Our Operational Emissions	25
Building the Workforce of the Future	27
Creating an Inclusive Environment	28
Talent Attraction, Development, and Engagement	33
Addressing Community Workforce Needs	37
Fostering Strong Communities	39
Community Development Financing	40
Offering Innovative Products and Better Access to Capital	42
Fair and Responsible Banking	42
Citizens Helping Citizens	43
Appendix	44
GRI Index	45
SASB Index	51
Notes	53

Introduction

At Citizens, our approach to environmental, social and governance topics is an extension of our Credo, which calls for us to perform our best every day so that we can do more for our customers, colleagues, communities, and shareholders. Our commitment to continuous progress is woven into the fabric of our business, supporting our effort to help deliver long-term value for our stakeholders while helping create a thriving, sustainable, and inclusive future for all those we serve.

IN THIS SECTION:

Message From Our Chairman and CEO	4
About This Report	6
About Citizens Financial Group	6
2023 Highlights	8
Summary of Citizens’ Sustainability Announcement	9
Our Approach	10
Stakeholder Engagement	12

Message From Our Chairman and CEO



At Citizens, we are guided by our Credo to perform our best every day to help our customers, colleagues, and communities reach their potential. These values serve as our north star, allowing us to successfully navigate dynamic external environments by putting the best interests of our stakeholders at the forefront. Our environmental, social and governance efforts are an extension of these values, creating opportunity for us to use our reach, innovation, and insights to build a more diverse and sustainable future where all can thrive. This report showcases how we continue to take a pragmatic and thoughtful approach to create lasting change for those we serve and the communities where we live and work.

Leading With Robust Corporate Governance

Core to how we do business is our strong governance framework which enables us to strengthen board and management accountability and create long-term value for shareholders. Strong corporate governance is essential to mitigating risk and ensuring ethical and transparent conduct. It is these guidelines and structures that allow us to deliver on our promise to perform our best.

Driving Positive Climate Impact

We believe banks have the responsibility and opportunity to play a role in helping build a more sustainable future. This past fall, we stepped up with a sustainability announcement that has three major components – a target to finance and facilitate \$50 billion in support of green and social initiatives by 2030, including a \$5 billion green sub-target for initiatives that support a lower-carbon future; an ambition to engage corporate clients in high-emitting sectors on climate-related topics, starting with 100% of our Oil & Gas clients by the end of 2024; and a commitment to achieve carbon neutrality by 2035. These targets reinforce our strategy to drive positive climate

impact by seizing business opportunity, meeting stakeholder expectations, and advancing credible and tangible impact.

As a trusted advisor, we are committed to helping our commercial clients achieve their business objectives and sustainability goals through tailored guidance and resources, innovative green financial solutions, such as our Sustainable Deposits and Carbon Offset Deposit Account products, and insights based on our own experiences and industry expertise. Our client engagement efforts are being well-received and our teams have found opportunities to help our clients drive sustainability progress and strong business results.

Building the Workforce of the Future

The needs of today's economy and workforce are rapidly changing. Within and beyond Citizens, we are committed to developing a diverse and skilled talent base that can help position our company, clients, and communities for future success. Inclusion and belonging are woven into the fabric of our bank. We know diversity of thought and experience makes us stronger and more innovative, and we continue to take measurable steps to create greater representation within our teams, invest in our colleagues' growth and development, and foster a culture that celebrates new and creative ideas.

We also use our reach, innovation, and insights to help ensure our clients and communities have the diverse and skilled talent needed to achieve the best possible tomorrow. As a bank that supports large and small companies across industries and markets, Citizens is well-positioned to address local workforce challenges, serving as a bridge between companies looking to fill critical roles and community organizations that provide upskilling and reskilling programs to students and workers for career advancement.

In 2023, we applied this community-driven approach to convene industry, civic, and community leaders in Rhode Island, New Jersey, Pittsburgh, and New York City to develop strategies on how we can work together to create sustainable solutions that catalyze economic

growth. We also partnered with impactful organizations like Education Design Lab, Pursuit, and the Greater Boston YMCA to provide upskilling and reskilling services that are creating new pathways for diverse and low- and moderate-income community members to enter in-demand, well-paying careers.

Fostering Strong Communities

Vibrant, thriving communities are the cornerstone of our business strategy and success. Across our footprint, we work to strengthen low- and moderate-income communities by expanding economic opportunity and closing the wealth gap. In 2023, we provided \$6 million in closing cost assistance grants and more than 18,000 mortgages totaling \$5.3 billion to boost homeownership in these communities. We made 6,700 loans totaling \$333 million to support small business growth. And we provided \$1.3 billion in total equity and loan commitments to finance the construction or revitalization of more than 5,000 new units of affordable housing.

We take great pride in prioritizing and investing in our sustainability and impact efforts on an enterprise level, and it is our colleagues — and their skills and passions — who bring this work to life. In 2023, our volunteer participation grew by an incredible 33%, with nearly 9,000 colleagues contributing a record 232,000 volunteer hours to support 3,349 community organizations across our footprint.

Looking Ahead

As we progress on our environmental, social, and governance journey, I am confident in our strategy and areas of focus, as well as our ability to identify and execute on new opportunities for our company and stakeholders. Over the past year, we have made meaningful commitments and advancements to do more for those we serve. While our more than 17,500 colleagues and partners continue to make great progress towards fostering a strong and sustainable economy, we know that there is even more we can do.

Thank you for your partnership. Together, we can build a strong, diverse, and sustainable economy for the future.

Kind regards,



Bruce Van Saun
Chairman and Chief Executive Officer
Citizens Financial Group, Inc.

About This Report

This is Citizens’ seventh annual Environmental Social Governance Report, previously known as the Corporate Responsibility Report. Unless stated otherwise, the information and data in this report reflect Citizens’ performance for the period of January 1, 2023, through December 31, 2023. Prior to this report, our most recent Environmental Social Governance Report was published in September 2023.

This report has been prepared with reference to the Global Reporting Initiative (GRI) Standards and the Sustainability Accounting Standards Board (SASB) Commercial Banks sector standard. Content indexes for both standards are provided in the [Appendix](#).

To support the transparency and reliability of our disclosures, we have obtained third-party limited assurance of our Scope 1 and 2 greenhouse gas (GHG) inventory and additional performance measures reported to CDP (formerly the Carbon Disclosure Project). This assurance was provided by [Stantec](#).

Additional information about our company’s Sustainability & Impact strategy and programs, including an archive of past reports and other related disclosures, is available on our [website](#).

About Citizens Financial Group

Citizens Financial Group, Inc. is one of the nation’s oldest and largest financial institutions, with \$222 billion in assets as of December 31, 2023. Headquartered in Providence, Rhode Island, Citizens offers a broad range of retail and commercial banking products and services to individuals, small businesses, middle-market companies, large corporations, and institutions. Citizens helps its customers reach their potential by listening to them and by understanding their needs in order to offer tailored advice, ideas, and solutions.

In Consumer Banking, Citizens provides an integrated experience that includes mobile and online banking, a full-service customer contact center, and the convenience of approximately 3,200 ATMs and more than 1,100 branches in 14 states and the District of Columbia. Consumer Banking products and services include a full range of banking, lending, savings, wealth management, and small business offerings.

In Commercial Banking, Citizens offers a broad complement of financial products and solutions, including lending and leasing, deposit and treasury management services, foreign exchange, and interest rate and commodity risk management solutions, as well as loan syndication, corporate finance, merger and acquisition, and debt and equity capital markets capabilities.

More information is available at [citizensbank.com](#), or visit us on [LinkedIn](#), [Facebook](#), or [X](#).

\$222.0 billion
in Assets

\$177.3 billion
in Deposits

\$146.0 billion
in Loans & Leases

17,570
full-time-equivalent colleagues

Data as of Dec. 31, 2023.

Our Mission, Vision, and Values

Our mission is to help our customers, colleagues, and communities reach their potential. Our vision is to be a top-performing bank distinguished by its customer-centric culture, mindset of continuous improvement, and excellent capabilities.

Our Credo brings to life our internal values. These values drive our actions and help us perform our best every day, delivering more for all stakeholders and serving clients with a broad range of products and services.



Our Credo

We perform our best every day so we can do more for our customers, colleagues, communities, and shareholders.

Our Values

We strive to always:



Exceed Customer
Expectations



Do the Right Thing



Think Long Term



Work Together

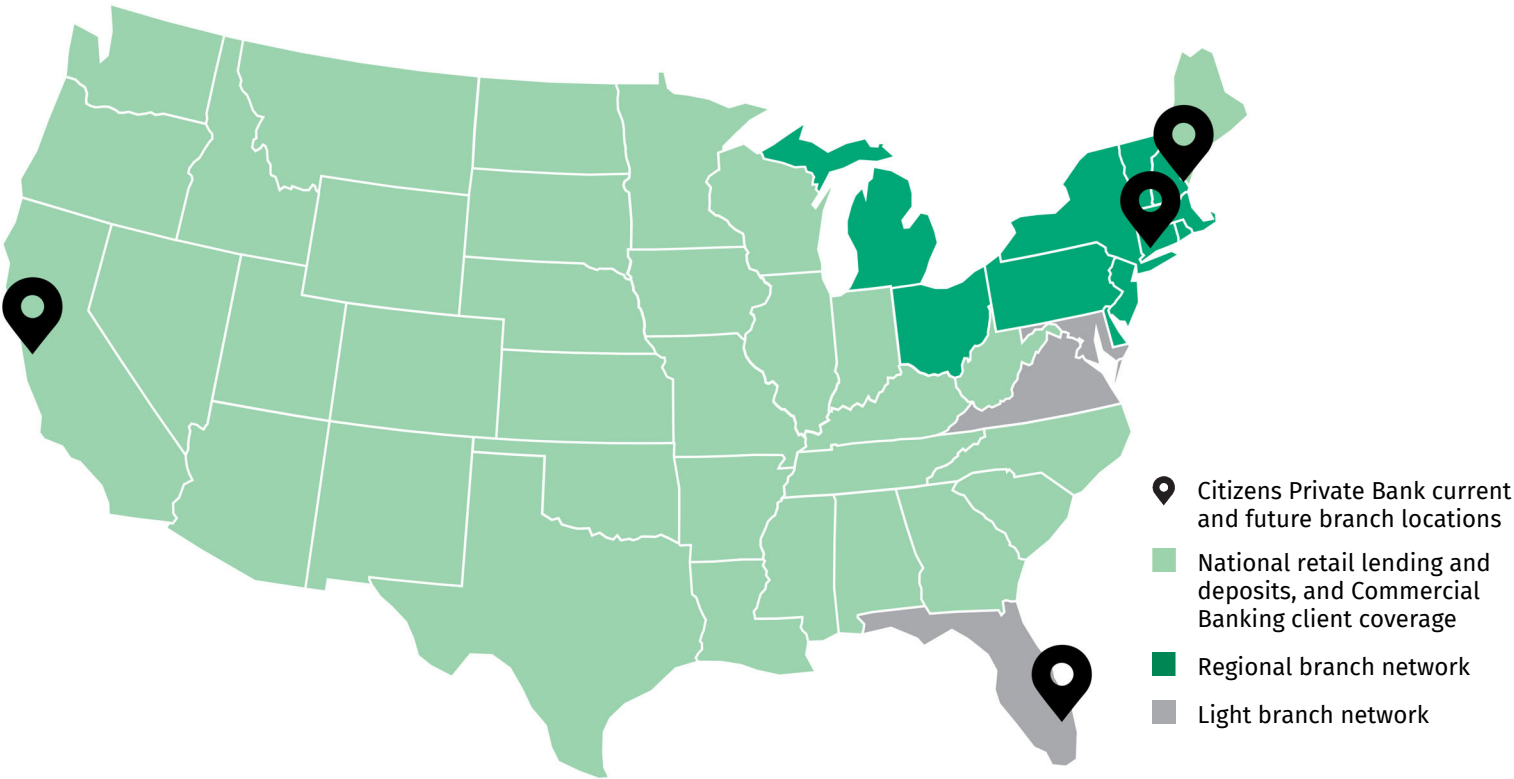
National Reach

Deposits from all
50 states

with Citizens Access®

More than 6 million
retail customers

across all 50 states



2023 Highlights

Leading With Robust Corporate Governance

12 out of 13 directors are considered independent in accordance with NYSE and SEC independence standards.

Lead Independent Director **appointed annually**.

Diverse Board composition with varied experiences and perspectives informs discussion and supports sound decision-making. Our nominated Board is 38% gender diverse and regularly refreshed, with eight new directors appointed in the past five years.

Citizens' Board named **2023 Top Public Company Board of the Year** by the National Association of Corporate Directors New England Chapter.

Driving Positive Climate Impact

Announced a \$50 billion Sustainable Finance Target, including \$5 billion for green initiatives.*

Completed enterprise climate risk assessment and **expanded bottom-up client review** for evaluation of climate-related risks and opportunities.

Began receiving **renewable electricity credits from the Sunflower Wind Project facility** under a virtual power purchase agreement between Citizens and Ørsted.

Aided seven environmental nonprofits through the **Champions for Energy Efficiency & Renewable Energy Award**.

Building the Workforce of the Future

Approximately 3,500 colleagues belonged to at least one business resource group as of December 31, 2023.

Used local relationships to support a variety of workforce development-related organizations and initiatives across our footprint, including contributing to the Andy Warhol Museum in Pittsburgh, the Queens Night Market, and others.

Transitioned to new Organizational Health Survey tool, achieving a participation rate of 87%.

Citizens contributed **more than \$5.5 million to benefit workforce development programs** in 2023.

Fostering Strong Communities

Since 2012, provided **nearly \$8 billion in debt and equity** to support the creation or rehabilitation of nearly 50,000 housing units, impacting an estimated 565,000 individuals.

Since 2021, **provided \$65 million in capital and made \$210,000 in cash grants** to aspiring entrepreneurs from underrepresented communities through our Small Business Opportunity Fund.

Invested approximately \$500 million in Low-Income Housing Tax Credit developments, helping to provide over 3,200 affordable housing units.

Colleagues logged 232,000+ volunteer hours benefiting 3,000+ community organizations, served on 1,000+ community boards or committees, and **contributed more than \$1.1 million through the bank's matching gifts donation program**.

* Citizens' September 2023 sustainability announcement, including the \$50 billion Sustainable Finance Target, is explained on the next page.

Summary of Citizens' Sustainability Announcement

In September 2023, Citizens announced a series of initiatives designed to elevate and enhance our commitment to sustainability and impact. These included a \$50 billion Sustainable Finance Target, a plan to engage corporate clients on the lower-carbon transition, and a goal to achieve operational carbon neutrality by 2035. As part of our commitment to transparency, we will disclose our progress annually.



Supporting Sustainable Solutions

To contribute to a more sustainable future, we have set a \$50 billion Sustainable Finance Target to finance and facilitate green and social activities by 2030. This includes investments in affordable housing, support for small businesses, and the financing of targeted community development projects. It also includes \$5 billion in financing and facilitation for green initiatives such as renewable energy, clean technologies, and green buildings.

[Our Approach to Sustainable Finance](#) outlines our methodology for tracking progress against the target.

Goal: \$50 billion Sustainable Finance Target that includes \$5 billion in financing and facilitation for green initiatives

i For additional details, including reporting on eligible financing activity in 2023, see [Driving Positive Climate Impact](#) and [Fostering Strong Communities](#).



Helping Clients Transition to a Sustainable Future

As a trusted advisor, Citizens is committed to supporting clients wherever they are on their sustainability journeys. With that in mind, we plan to engage with corporate clients in high-emitting sectors on climate-related topics. To start with, we set a goal to engage with 100% of Oil & Gas clients by the end of 2024.

We are also working to ensure that 100% of our Commercial colleagues are prepared to engage with clients on climate-related topics, which will better enable them to leverage opportunities, meet stakeholder expectations, and manage risk.

Goal: To engage with 100% of Oil & Gas clients by the end of 2024

i For more information, see [Partnering With Our Clients](#).



Minimizing Citizens' Environmental Impact

We have also announced our intention to be carbon neutral in our operations by 2035. We set Scope 1 and 2 emissions targets in 2021 that will be achieved through ongoing energy conservation investments and energy reduction initiatives across the company's footprint.

By 2035, we are targeting to offset remaining Scope 1 and 2 emissions through high-quality offsets and renewable energy credits.

Goal: To be carbon neutral in our operations by 2035

i For more information, see [Reducing Our Operational Emissions](#).

Our Approach

Effective management of environmental, social, and governance topics enables us to better meet the needs of our clients and customers, serving as a lever to drive business growth while helping colleagues and communities thrive.

Our integrated, enterprise-wide Sustainability & Impact strategy helps us unite our values and purpose to build a more diverse and sustainable future for all those we serve. Led by robust corporate governance, this strategy guides the decisions we make. It means serving our customers and clients, engaging shareholders, reducing our environmental impact, and empowering our colleagues and communities to thrive. The four pillars of our strategy outline where we believe we have the greatest opportunity to use our reach, innovation, and insights to create a positive impact for the economy, society, and the environment.

Our Strategy Pillars

Leading With Robust Corporate Governance	Driving Positive Climate Impact
Building the Workforce of the Future	Fostering Strong Communities

Oversight of Environmental, Social, and Governance Matters

Our strategy and activities on environmental, social, and governance matters are overseen and guided by our Board of Directors and executive leadership. The Nominating and Corporate Governance Committee of the Board has primary responsibility for this oversight. Each Board committee also has oversight responsibilities for related matters pertaining to its directive.

- **Nominating and Corporate Governance Committee** — Guides our commitment to ESG matters, including implementation of our ESG governance framework, completion of materiality assessments, and monitoring the evolution of our Sustainability & Impact strategy.
- **Compensation and Human Resources Committee** — Oversees compensation programs and policies, talent management and succession, and inclusion programs. The Compensation and Human Resources Committee also evaluates executive performance and approves executive compensation.
- **Risk Committee** — Oversees risks associated with ESG matters through its oversight of the operation of the company’s Enterprise Risk Management (ERM) Governance Framework, under which all risks are managed, including reputation risk, cybersecurity risk, and impact on risks due to climate change.
- **Audit Committee** — Oversees the internal control environment for material ESG disclosures, and approving their inclusion in relevant external reports. The Audit Committee also oversees the Conduct and Ethics Office, which has responsibility for identification and oversight of risks associated with our culture and conduct.

For additional information, see the Corporate Governance Guidelines and Board committee charters available on the [Corporate Governance](#) page of our website.

At the management level, several key leaders are responsible for embedding our Sustainability & Impact strategy across the organization. The Chief Experience Officer, who reports directly to the CEO and is a member of the Executive Committee, is responsible for overseeing and aligning Sustainability & Impact efforts across functions. The Head of Sustainability is responsible for developing and implementing a strategic approach to the company’s related initiatives, with a focus on climate.

Our management structure also includes the ESG Executive Steering Council. Co-chaired by the Chief Experience Officer and Chief Financial Officer, the Council is responsible for:

- Reviewing and providing strategic guidance on priority and important environmental, social, and governance topics
- Helping integrate efforts across the lines of business
- Monitoring progress, trends, and benchmarking exercises
- Providing a clearinghouse for ESG-related business ideas, strategies, and long-term goals
- Championing the integration of ESG into the business, key initiatives, and long-term planning

We have also established robust oversight and governance of risks and opportunities related to climate change. For more information, see our [2024 Climate Report](#).

Materiality Assessment

Our Sustainability & Impact strategy is focused on the areas that are most critical to our business success and that align with the interests and expectations of our stakeholders. To help set our priorities, we periodically conduct a formal materiality assessment in partnership with an independent firm. Our most recent assessment, completed in 2023, included consultation with internal and external stakeholders and a comprehensive review of relevant research and standards. We prioritized key topics using a “double materiality” lens, looking not just at how environmental, social, and governance issues affect our business, but also how our business could positively or negatively impact the economy, the environment, and people. In evaluating the significance of potential impacts, we considered their likelihood and severity over the short, medium, and long term. The assessment highlighted the topics listed to the right.

Key Topics (alphabetical)

- Community Development and Impact
- Data Privacy and Information Security
- Inclusion
- Energy Transition and Climate Change
- Enterprise Risk Management
- Ethics and Compliance
- Fair and Responsible Banking
- Talent Attraction, Engagement, and Development

Other Important Topics

- Corporate Governance
- Human Rights
- Other Environmental Impacts
- Supply Chain Management

In addition to reconfirming our priorities, the assessment underscored one of the most important drivers of our Sustainability & Impact strategy: the essential role that Citizens plays in supporting economic development and contributing to the financial well-being of our clients, customers, and communities. The process also provided insight into new and emerging issues, such as artificial intelligence, that Citizens will continue to monitor and assess. By continuing to identify and address key challenges and opportunities for our business and stakeholders, we aim to contribute to a strong economy and thriving communities for all.

Stakeholder Engagement

We strive to continuously develop stronger relationships with our stakeholders, including by engaging them in transparent and productive discussions to better understand their questions, priorities, and concerns. This approach provides us with valuable insights that inform our business strategy and objectives, and is a core element of Citizens’ culture as reflected by our Credo. The table summarizes how we engage with our stakeholders throughout the year, including on ESG topics.

Stakeholder	Key Methods of Engagement		Examples of Topics Discussed
Colleagues	<ul style="list-style-type: none">• Annual colleague listening survey• “Let’s Connect” sessions with executives• Town hall meetings with CEO and other executives• Intranet site• Business Resource Groups	<ul style="list-style-type: none">• Colleague volunteerism program and portal, including a matching gifts program• Credo Awards program and Credo Week celebration• Performance Enablement reviews and check-ins	<ul style="list-style-type: none">• Business strategy and performance• Business transformation• Performance and development• Wellness and benefits• Inclusion• Community engagement• Sustainability
Customers	<ul style="list-style-type: none">• Branch interactions and 1:1 banking relationships• Citizens website• Social media channels• Citizens Listens surveys and focus groups• Customer complaint program• Quarterly market outlook report/calls for clients (and advisors)• Annual Voice of the Client survey	<ul style="list-style-type: none">• M&A Outlook survey of CEOs/CFOs and private equity sponsors• Payments pulse survey• Junior Achievement survey• Business Banking Advisory Board• Treasury Solutions Client Advisory Panel• Business Banking Resiliency Report	<ul style="list-style-type: none">• Customer experience• Banking needs• Business lending and advisory services• Financial education• Community events
Community Nonprofit Organizations	<ul style="list-style-type: none">• Citizens’ local market leadership teams• Corporate giving through Citizens, Citizens Charitable Foundation, and Citizens Philanthropic Foundation	<ul style="list-style-type: none">• Citizens colleagues serving on nonprofit boards and committees• Convening community partners and other key stakeholders• Skills-based volunteerism provided to share expertise	<ul style="list-style-type: none">• Community needs and trends• Financial empowerment• Workforce development
Shareholders	<ul style="list-style-type: none">• Annual meeting of shareholders• Shareholder engagement calls and meetings• Investor conferences• Quarterly earnings calls	<ul style="list-style-type: none">• Phone and email inquiries• Proxy statement• Press releases and SEC filings• Annual Review	<ul style="list-style-type: none">• Corporate strategy• Financial performance• Executive compensation• Sustainability• Human capital management• Board composition
Regulators, Policymakers, Legislators	<ul style="list-style-type: none">• Regular supervisory examinations• Regular meetings with management and Chairs of the Audit Committee and Risk Committee• Regular engagement with Regulatory Affairs and Government Affairs teams	<ul style="list-style-type: none">• Trade associations• Required regulatory reporting	<ul style="list-style-type: none">• Capital planning• Liquidity management• Governance• Regulatory compliance• Risk management• Cybersecurity• Workforce development• Safety and soundness

Leading With Robust Corporate Governance

Strong corporate governance is foundational to how we do business. Having a robust corporate governance framework strengthens Board and management accountability and is essential to ensuring we make sound business decisions. Our commitment to strong governance aligns with best practices and creates an ethical culture that promotes the long-term interests of our customers, colleagues, shareholders, communities, and other stakeholders.

IN THIS SECTION:

Board Governance	14	Privacy and Personal Information Protection	18
Shareholder Engagement	15	Cybersecurity	19
Executive Compensation	15	Fraud Prevention	20
Business Conduct and Ethics	16	Political Engagement	20
Enterprise Risk Management	17	Supply Chain Management	20

Board Governance

Citizens’ Board monitors the company’s governance practices to ensure they create an ethical and transparent culture, promote the long-term interests of our stakeholders, and foster confidence in how we manage our business. For more information, see our [2024 Proxy Statement](#), which describes our key governance practices that are collectively designed to promote:

- Board independence and oversight
- Selection of highly qualified and diverse Board candidates
- Alignment of the Board’s skills with the company’s strategy
- Alignment of the Board’s and executive management’s interests with those of our shareholders
- Director development with an ongoing Board education program
- Robust oversight of risk
- Shareholder rights that support our shareholders’ voice

Citizens’ Corporate Governance Guidelines dictate how our Board directs our affairs and establish a common set of expectations as to how the Board, its various committees, and individual directors should perform their functions. These and other key corporate governance documents, including our Bylaws, Certificate of Incorporation, Code of Business Conduct and Ethics, and committee charters, are available in the [Corporate Governance](#) section of our website.

Board Recognition



Citizens’ Board was named 2023 Top Public Company Board of the Year by the National Association of Corporate Directors New England Chapter.

Board Diversity

The Board values diverse perspectives and experiences, which it believes are critical to robust discussion and effective decision-making. When reviewing the composition of our Board and its committees, the Nominating and Corporate Governance Committee considers self-identified diverse characteristics of directors and nominees, in addition to each person’s background, experience, independence, and tenure. Moreover, the Board requests that any firms engaged in the director search process include diverse individuals in their lists of potential candidates.

Between 2019 and our most recent annual meeting held on April 25, 2024, eight new directors have been appointed to the Board, with four of those representing diverse groups. In addition to Board refreshment, the Nominating and Corporate Governance Committee considers the periodic rotation of committee members, ensuring each committee has an appropriate balance of experience and fresh perspectives.

Board Education

Each of our Board members participates in annual training and continuing education programming that covers a broad range of topics to enhance and strengthen the skills, knowledge, and competencies of directors, both individually and collectively. Topics covered during 2023 included cybersecurity, payments, sustainability, innovation, and anti-money laundering.

12 of 13

directors independent

All key Board committees

fully independent*

6.5 years

average tenure

8 new directors

appointed in last 5 years

66 years

average age

54% of directors

represent diverse groups: five women, one person of color, and one veteran

Data as of Apr. 25, 2024.

* Audit, Compensation and Human Resources, Nominating and Corporate Governance, and Risk committees

Shareholder Engagement

Continuous engagement with our shareholders is important to fostering trust, transparency, and alignment of interests. We actively communicate and engage with shareholders through various channels, including quarterly earnings presentations, investor conferences, press releases, SEC filings, shareholder dialogue, our annual review, our proxy statement, and the annual meeting of shareholders.

Our enhanced shareholder rights support our shareholders' voice. These include providing shareholders with proxy access, the right to call a special meeting, the annual election of directors with a majority vote standard in an uncontested election, and a simple majority vote standard to amend our Certificate of Incorporation and Bylaws.

Each year, we proactively engage with our largest shareholders to seek their feedback and input on corporate governance, executive compensation, sustainability, human capital management, and any other topics that are top of mind for them. We share the feedback we receive with our Board and use it to enhance our existing practices. We also hold discussions with shareholders at their request. In 2023, we met with shareholders representing ~30% of our outstanding stock, with discussions focusing on governance, progress on climate actions and reporting, human capital management, executive compensation, and Board composition.

More information on our shareholder outreach program, including details on how our shareholders can contact the Board, can be found in our [2024 Proxy Statement](#).

Executive Compensation

Citizens' executive compensation program is designed to attract, retain, and motivate the company's leaders to deliver long-term business performance in a manner that promotes effective risk management and strong accountability and is aligned with shareholder interests. The program is overseen by the Board's Compensation and Human Resources Committee, which continuously evaluates its design and related disclosure with the support of an independent compensation consultant and with reference to peer and market practices, as well as shareholder feedback.

Executive compensation is composed primarily of base salary and variable compensation, which includes short- and long-term awards. To promote alignment with shareholder interests, our executive pay mix delivers more than 80% of total compensation in at-risk variable compensation. In addition, at least 50% of long-term awards for senior leaders (and nearly two-thirds in the case of the CEO, Chief Financial Officer, and Heads of Consumer and Commercial Banking) are granted in the form of performance-based awards with a three-year performance period.

More information regarding our executive compensation program, including 2023 performance year compensation, the decision-making process, and related governance processes, can be found in our [2024 Proxy Statement](#).

Business Conduct and Ethics

We are committed to conducting our business with honesty and integrity and in full compliance with all applicable laws and regulations. We believe that fostering an ethical culture is essential to delivering the best possible banking experience for our customers, a great workplace for our colleagues, and long-term returns for our shareholders.

Our [Code of Business Conduct and Ethics](#) (the Code) establishes the core standards of ethical conduct for our company and is applicable to all directors, officers, and colleagues. Our Conduct and Ethics Office is overseen by the Audit Committee of the Board and has primary authority and responsibility for implementation, including monitoring the behavior of our colleagues in relation to the Code and other key policy considerations on a company-wide basis.

Topics addressed by the Code include:

- Protection of customer and company assets
- Conflicts of interest
- Outside activities
- Personal conduct
- Equal opportunity
- Anti-money laundering and sanctions compliance
- Compliance with antitrust laws
- Environment, health, and safety
- Integrity of reports, disclosures, and investigations

All Citizens colleagues are required to complete annual training on the Code and to recertify that they have read, understood, and agreed to comply with its principles and provisions. All colleagues also receive mandatory annual training in anti-money laundering, anti-bribery and corruption, privacy, cybersecurity, and fraud prevention, among other topics.

Each business line has implemented processes and controls to facilitate compliance with our Anti-Bribery and Corruption Policy and relevant laws and regulations. This includes performing risk assessments for financial crimes with consideration of the nature of operations, vendor activities, geography, and interaction with customers. The Conduct and Ethics Office assists business lines in complying with the Policy by offering advice and guidance and providing relevant management information and reporting, including trend analysis and escalation of any instances of noncompliance to senior management.

Reporting Ethics Concerns

Colleagues are required to promptly report any known or suspected violations of the Code, laws and regulations, or company policies. Citizens provides several channels for colleagues to report suspected violations, including our Right Call hotline and website, both of which offer an anonymous reporting option.

It is a violation of the Code for any supervisor, manager, or colleague to discourage anyone from filing a report or limiting the avenues in which to file a report. Being directed to violate the Code by a supervisor or manager is not a valid reason or excuse for committing the violation, and colleagues are required to report any such directions if they occur. All reports are kept in confidence to the extent possible. Retaliation against any individual who in good faith reports an issue or concern, or who cooperates with a Citizens-sanctioned investigation, is not tolerated.

Enterprise Risk Management

The responsible and effective management of risk is fundamental to our business and includes our efforts to ensure financial stability, protect stakeholder interests, and promote long-term sustainability. We are dedicated to maintaining a strong, integrated, and proactive approach to the management of the risks we are exposed to in pursuit of our business objectives.

Our Enterprise Risk Management (ERM) Governance Framework includes active oversight by the Board of Directors and its Risk Committee, which advises the Board in relation to current and potential future risk strategies, including determination of risk appetite and tolerance. Risk governance is further supported by our Chief Risk Officer and various management-level risk committees through which senior executives and key stakeholders provide oversight, guidance, and strategic direction in managing risks across the enterprise.

Three Lines of Defense

Our ERM Governance Framework is embedded in our business through a three-lines-of-defense model, which defines responsibilities and accountabilities at all levels of the organization:

- 1

First Line of Defense

The business lines are accountable for identifying, assessing, managing, and controlling risks associated with the products and services they provide, regardless of where the activity is performed.
- 2

Second Line of Defense

Corporate Risk Management, our independent risk management function, is accountable for owning and developing the policies, risk and control frameworks, and tools that the business lines use to manage risk in their businesses. Corporate Risk Management is accountable for overseeing and challenging the business lines on the effective management of all risks.
- 3

Third Line of Defense

Our Internal Audit function provides independent assurance that the ERM Governance Framework is appropriate considering the size, business model, complexity of operations, and risk profile of the organization.

Environmental and Social Risk

Citizens interacts with entities and individuals that operate across a variety of sectors, some of which may be associated with environmental and/or social risk. We conduct our business affairs in accordance with the highest ethical, legal, and regulatory standards and only engage in business relationships with individuals or entities of reliable reputation and sound character. We have integrated the management and oversight of these risks with our strategic planning and risk management processes. This includes the administration of an Environmental, Social, and Ethical (ESE) Risk Screening to all wholesale borrowers to determine if they operate in certain high-risk, non-preferred or prohibited sectors. An ESE Risk Assessment is required for all borrowers that operate in any of these sectors or otherwise raise ESE concerns for any other reason; this includes an ESE Questionnaire to determine if the risk category is normal, sensitive, or high. Any transaction with borrowers that fall under sensitive- or high-risk designations is subject to enhanced due diligence and approval requirements. Our Commercial and Consumer credit policies include risks related to environmental, social, and governance matters (e.g., physical risks associated with climate change), as relevant.

Privacy and Personal Information Protection

Privacy and confidentiality of personal information form the foundation of trust and consumer confidence. Citizens is committed to collecting, using, and sharing personal information responsibly.

Citizens' publicly available Privacy Policy, available on our [Privacy Policies](#) landing page, outlines how we process personal information and choices consumers have to control the use and sharing of such information. Citizens also maintains an internal Privacy Policy and related standards that establish controls around minimizing privacy risk in the processing of personal information.

Our commitment to data privacy is rooted in both strict compliance with federal and state privacy laws and the intention to use personal information in the least intrusive way possible. As a result, we seek to incorporate concepts such as data minimization, purpose limitation, and privacy by design into our tools, technologies, and culture.

Our independent Privacy Office reports to the Chief Privacy Officer and oversees our Privacy Program, including monitoring ongoing risks, implementing appropriate tools and processes, and supervising vendor and third-party adherence to the Privacy Policy and Program. The Privacy Office partners with our Cybersecurity team to ensure that effective controls over personal information are in place. It also works closely with our Legal team to monitor new and emerging privacy laws and implement timely solutions to maintain compliance. In addition to ongoing monitoring, the Privacy Office conducts privacy risk assessments on an annual basis.

Our Internal Audit function also performs annual audits related to the Privacy Program. The Privacy Office presents its Annual Privacy Report to the Board of Directors and escalates risks through executive management and governance committees as necessary. Citizens is also subject to periodic reviews of its Privacy Program by federal regulators.

Both our Privacy Office and our Enterprise Incident Management team have established processes and procedures to identify and respond to suspected or actual data privacy incidents that may compromise the confidentiality, integrity, or availability of personal information. We provide our employees with the ability to report such incidents through our internal systems, and our centralized processes allow escalation to a dedicated incident response team for severity assessment, mitigation, root cause analysis, and corrective action if warranted. Our privacy training module, required of all our employees and contractors, is an important tool to ensure those who have access to our customer and employee personal information understand proper use, disclosure, and protection of that information.

We recognize that emerging technologies such as artificial intelligence — and other new innovative products and services — offer opportunities to better serve our customers, but that they can also raise new privacy and security risks. Citizens is committed to responsibly managing how we use such technologies, including maintaining a multistakeholder approach to identifying emerging risks that may pose privacy harm to our customers.

Cybersecurity

As digital technologies continue to play an increasing role in banking and other sectors, the importance of cybersecurity continues to increase as well. Citizens is committed to maintaining a robust security ecosystem that can effectively safeguard our customers and other stakeholders from the ever-changing landscape of cyberthreats.

Overseen by our Chief Security Officer, the company’s comprehensive cybersecurity program is designed to protect our colleagues, customers, assets, premises, systems, and information against unauthorized access, misuse, alteration, or destruction that could result in harm or inconvenience to our customers, loss, and/or reputational damage for the company. Our program includes our security policies and covers access control, infrastructure security, cybersecurity event and incident management, data protection, third-party-vendor cyberrisk oversight, payment security, and related training and awareness. The cybersecurity program leverages the Enterprise Incident Management team as needed for incident response support.

Our program undergoes regular independent assessments and benchmarking and is subject to oversight and evaluation by federal regulators to ensure compliance and efficacy. This includes routine testing of our defenses against external threat actors. We reference and align with multiple external frameworks and standards, including the U.S. Department of Commerce’s National Institute of Standards and Technology (NIST) Cybersecurity Framework, to ensure that our program is maintained in accordance with regulatory expectations and industry best practices.

Our Corporate Security and Resilience (CS&R) team is responsible for driving continuous improvement of our cybersecurity and business resilience capabilities. This includes putting in place effective controls to safeguard our customers’ information and privacy and continually enhancing our approach as cyberthreats evolve. We work with law enforcement, regulatory agencies, industry experts, and trade organizations to ensure we are prepared for emerging threats, and regularly test our capabilities to detect, respond to, and recover

from security events. We also participate in and support programs within the public and private sectors to enhance cybersecurity preparedness across the business community.

We continue to hire top industry talent and provide our CS&R team with the training and tools needed to build our capabilities. This includes efforts to cultivate future talent through internships and early career development programs.

Citizens colleagues serve as a critical first line of defense against cyberthreats. Every colleague and contractor at Citizens is required to complete an annual training program that includes coverage of cybersecurity, physical security, fraud, anti-money laundering, and customer identification. Additionally, we provide ongoing security training and awareness information to our colleagues, including regular phishing awareness campaigns. This comprehensive training program ensures that each of our colleagues is well informed and equipped to protect customer data and other sensitive information effectively.

We also strive to educate our customers about emerging cybersecurity and fraud issues. We utilize numerous channels including email, branch signage, online banking messages, and social media posts to inform them about how to best protect themselves. In addition, we run online communication campaigns linked to national awareness-raising efforts including Internet Safety Month, Cybersecurity Month, and Identity Theft Awareness Week. In each case, we employ a combination of strategies to engage customers and offer them practical advice and tips on how to avoid online scams, phishing attacks, and more.

In addition to our consumer-focused efforts, we provide timely information on cybersecurity and fraud topics to our commercial clients.

Board Oversight

The full Board and both its Risk and Audit committees have oversight of the management of our cybersecurity risk. The Audit Committee is responsible for overseeing the cybersecurity program under its risk oversight responsibilities as it relates to financial controls. The Risk Committee is responsible for oversight of the management of cybersecurity risk consistent with the ERM Governance Framework.

The Chief Security Officer presents the cybersecurity program to the Risk Committee for annual approval in conjunction with an annual cybersecurity briefing, which provides an overall assessment of the effectiveness of the program and an outlook for the upcoming year.

In addition to this briefing, the Chief Security Officer provides updates on cybersecurity to the Risk Committee at each of its meetings. The Audit Committee and Board also receive regular cybersecurity updates as part of reporting provided by the Technology/Cyber Oversight (TCO) Committee. Chaired by the CEO, the TCO Committee is a management committee that provides executive oversight, guidance, and transparency for key initiatives designed to enhance our technology stability, cyberdefenses, and risk management capabilities. Further, to ensure the Board maintains appropriate knowledge of this work, it receives cybersecurity training on an annual basis, supplemented with additional training as appropriate.

Fraud Prevention

Combating fraud is critical to safeguarding our customers’ financial assets, earning and retaining stakeholder trust, and maintaining the integrity and stability of the financial system.

Citizens works to protect customers from evolving fraud threats across multiple channels, including telephone interactions and online banking. To do so, we employ a multilayered technology approach including authentication, monitoring, and early identification. We strive to balance customer experience and fraud prevention through technologies and processes that reduce friction, such as two-way text messaging and email communications. However, as the industry evolves, so does fraud. We are therefore committed to continuous improvement of our fraud prevention practices to keep our customers protected.

Political Engagement

Citizens engages in advocacy on legislative and regulatory matters that affect our company, our customers, and the communities we serve.

Citizens’ political action committees (PACs) raise funds from colleagues on a voluntary basis. Citizens corporate funds are not used to make contributions to political candidates, political parties, or other political committees, such as “super PACs,” that contribute to or make independent expenditures on behalf of candidates. All PAC expenditures are overseen by senior management and disclosed via regular state and federal filings.

The Board’s Nominating and Corporate Governance Committee receives regular reports on political contributions and other expenditures associated with government advocacy, including lobbying activities and support for trade associations and similar organizations. In 2023, Citizens received a Center for Political Accountability-Zicklin Index score of 82.9 points.

For more information, see our Statement on Advocacy and Political Activities and our most recent Corporate Political Activity Report, available in the [Corporate Governance](#) section of our website.

Supply Chain Management

We recognize the significant influence that suppliers have on the quality of the products and services we provide to our customers, and on our efforts to deliver positive impacts across our value chain.

The supply chain management practice is led by Procurement Services, which works with internal business partners to identify, select, manage, and develop the supply base to meet the current and future vendor needs of the bank. Our objective is to identify responsible suppliers and treat them equitably, utilizing documented criteria that ensure high performance standards and value.

Our suppliers are integral to our mission and we view them and their actions as having an impact on our own reputation. Our [Supplier Code of Conduct](#) establishes a set of guiding principles that govern our relationships with suppliers. We expect suppliers to fully comply with this code, communicate it to their key leaders and employees, and extend its application throughout their supply chains.

Our Third-Party Risk Management program ensures that consistent, risk-based due diligence is completed across our vendor population on an upfront and ongoing basis. The program also provides transparent, enterprise-level visibility into our supply chain through regular reporting to the CRO and the Board Risk Committee.

Our supply chain management practice also includes efforts to promote supplier diversity (see page [32](#)) and reduce supply chain environmental impacts (see page [26](#)).

Driving Positive Climate Impact

The impacts of climate change and the transition to a lower-carbon economy present risks and opportunities for our business and our stakeholders. We believe banks will play a key role in leading the transition. At Citizens, we’re committed to driving positive climate impact by supporting our clients, empowering communities, reducing our operational emissions, and disclosing our progress along the way.

IN THIS SECTION:

Partnering With Our Clients	22
Understanding and Managing Climate-Related Risks	24
Reducing Our Operational Emissions	25

Partnering With Our Clients

To earn the role of trusted advisor to our clients, we strive to deliver clear and objective advice and provide tailored solutions that help them reach their goals. This includes assisting them in navigating the risks and opportunities associated with climate change. By helping them achieve their objectives, we aim to drive positive climate impact while continuing to generate long-term value for our shareholders.

To that end, we are continuing to build capabilities to help our commercial clients manage and benefit from the transition to a lower-carbon economy. Our key areas of focus include supporting clients with transition-related advice and services, advancing product innovation, and financing technologies and companies that are driving the green economy.

Supporting the Transition

Citizens partners with clients to help them achieve their key business objectives. This includes supporting them in navigating climate-related risks and seizing new opportunities to innovate and grow their businesses as the world transitions to a lower-carbon future. To that end, we continue to deepen our expertise and expand our engagement with new and existing clients on climate and transition-related matters — especially with middle-market companies and clients that may have limited internal capacity for this work.

With that in mind, we have announced our ambition to engage corporate clients in high-emitting sectors on climate-related topics, starting with 100% of our Oil & Gas clients by the end of 2024. In 2023, we made progress by engaging with 34% of clients in our Oil & Gas portfolio, and we are on target to engage the rest in 2024. We also continued to engage with numerous clients in other transition-relevant sectors, such as Commercial Real Estate, Transportation and Logistics, and Chemicals. We also deepened engagement through expansion of our ongoing pilot of sector-specific climate risk questionnaires. For more information, see [Client Climate Questionnaire](#) on page 24.

In support of our engagement strategy, we have committed to train all frontline Commercial colleagues on climate-related topics so they are prepared to listen, learn, and share insights with clients. Training content covers the fundamentals of climate, the energy transition, relevant impacts on clients, Citizens’ enterprise-wide Sustainability & Impact strategy, and how we can support clients through our innovative products and capabilities. As of year-end 2023, we trained 61% of frontline Commercial colleagues, which is inclusive of relationship and portfolio managers, and are on track to complete the remainder of our training target in 2024. In addition to targeted frontline colleagues, 45% of Treasury Solutions colleagues have completed training on climate-related topics.

Citizens’ 2030 Sustainable Finance Target

Citizens’ \$50 billion Sustainable Finance Target includes \$5 billion to finance and facilitate green initiatives. Eligible activities include those that support a broad array of environmental benefits, such as helping our customers’ transition to a lower-carbon economy, advancing green technologies, measuring and minimizing climate change risk, and mitigating the impacts of adverse climate events.

In 2023, we completed qualifying green financing transactions totaling more than \$91 million.

Accelerating the Green Economy

In addition to helping clients in existing industries respond to climate change, we are focused on identifying and supporting emerging growth sectors and companies whose products and services will be critical to a sustainable, lower-carbon economy.

To meet the unique needs of the renewable energy industry, Citizens Asset Finance provides equity investments to support a greener and more independent energy future. Since 2015, we have participated in the funding of a number of U.S. renewable energy projects, with total investments valued at approximately \$314 million at the end of 2023. Acknowledging the growth of and need for diverse types of clean energy technology, Citizens invested in its first solar tax equity transaction, which also included battery storage, in 2023.

The transition to a green economy requires a range of technological solutions to support the reduction and offset of carbon emissions, increase efficiency, and enable transparent tracking of data. Software solutions in particular are critical for emissions analytics, energy management and optimization, and offset management and verification. Through mergers and acquisitions and capital markets coverage of this high-growth and critical sector, we are building advisory capabilities focused on software and tech-enabled climate services that are powering an energy transformation, enabling sustainable policies, and improving stakeholder transparency.

Supporting Financing for Emissions-Reducing
Technology Upgrades

Ascend Performance Materials makes specialty materials, including nylon plastics and fibers, that are used in a variety of products from airbags to electronics. The manufacturing process for Ascend’s products requires large quantities of both steam and electricity. To increase reliability and reduce emissions at its Decatur, Alabama plant, the company sought to replace its aging coal-fired steam boilers with natural gas-powered cogeneration facilities. As cogeneration involves the production of steam and electricity in a single plant, this would greatly increase efficiency and reliability, as well as reduce the company’s dependence on grid energy. However, financing the new units presented a major hurdle.

Together, Ascend and Citizens devised a customized financing strategy that provided a construction loan to complete the equipment, followed by a six-year capital lease. As the agent, Citizens assembled a group of six banks to complete the deal, including four that were new lenders to Ascend.

In the years since they were installed, the new cogeneration units have produced benefits that position Ascend for long-term success, including reduced downtime for the plant; annual savings of approximately \$20 million in fuel, waste, and electricity costs; and a 40% reduction in GHG emissions.

Advancing Product Innovation

Citizens has a strong track record of developing innovative solutions to meet customers’ and communities’ evolving needs. This includes products to help clients put their capital to work in support of the transition to a lower-carbon economy and reduce environmental impacts associated with banking services.

Citizens’ Sustainable Deposits offering enables commercial and public-sector clients to direct their cash reserves in support of companies and projects focused on driving positive environmental and social impacts. The product is governed in accordance with our Sustainable Deposits Product Framework and Sustainable Deposits Eligibility Criteria, which were developed with the support of Morningstar Sustainalytics, a leading independent environmental, social, and governance and corporate governance research, ratings, and analytics firm.

Citizens’ unique [Carbon Offset Deposit Account](#)ⁱ allows clients to use credit earned on their deposit balances to purchase high-quality, third-party-verified carbon offsets that are retired on the client’s behalf and for their exclusive use. This gives corporate clients the opportunity to make a positive environmental impact while they continue to work on their longer-term emissions reduction strategies. Our [Carbon Offset Program Framework](#) establishes minimum requirements for offset quality and is updated annually to align with best practices and emerging standards and ratings in the voluntary carbon market.

We also recognize the opportunity to provide sustainable solutions to customers using our retail banking services. In 2023, Citizens partnered with Mastercard to develop a debit and ATM card made from 90% recycled plastic. Additionally, the card carries the Mastercard sustainable card badge, reflecting its lower life-cycle impact in terms of energy, material consumption, and carbon footprint. We began issuance of the new consumer and business debit and ATM cards in early 2024. Citizens was also the first bank in the U.S. to introduce Mastercard’s Touch Card feature, which increases accessibility for customers with visual impairment. Each card has a differently shaped, tactile notch on its side — rounded for debit and ATM and squared for credit — so customers can easily tell their cards apart by feel.

Providing Sustainable Wealth Management Solutions

In response to growing client interest, we are working to expand our offerings and support of sustainable and impact-based investment solutions. Our strategy emphasizes the utilization of core allocation models for client investment solutions, including exploring model portfolio solutions from leading providers in the sustainable and impact investing space. We also continue to invest in research and training to ensure frontline colleagues are versed in sustainable and impact-focused investment products.

These efforts not only support our clients’ desire to incorporate the environmental and social topics they care about into their investment strategies, but also help increase the flow of capital in support of companies working to enable a more sustainable and inclusive future.

Understanding and Managing Climate-Related Risks

Citizens' business and operations are exposed to risks stemming from climate change. These encompass both physical risks associated with shifting temperatures and extreme weather events and transition risks related to regulatory, market, technological, and other changes that may arise from the shift to a lower-carbon economy.

Coordinated by our Climate Risk Working Group, we continue to advance our organizational capability to identify, measure, monitor, and control climate-related risks, including developing tools and processes to assess how physical and transition risks may impact us or our clients. These efforts not only position us to meet current and emerging regulatory and financial disclosure requirements, but also to advise and support our clients in navigating the lower-carbon transition.

Identifying Climate-Related Enterprise Risks

Climate risk is considered a horizontal risk that impacts the bank through the amplification of traditional risk types, including credit, market, and operational risks, among others. To support a deeper understanding of these relationships and prepare for emerging regulatory expectations, we completed an Enterprise Climate Risk Assessment in 2023. This included assessing the severity of impacts from physical and transition risk on our traditional risks across different time horizons. Given that climate risk manifests as a potential accelerator of traditionally managed risk types, the assessment focused on how climate risk is mitigated through existing risk management processes as well as identifying areas of emergent risk beyond what is already accounted for in existing processes. For details on our findings, see our [2024 Climate Report](#).

Measuring Climate-Related Risks in Our Lending and Investments

One likely impact of climate change is the potential for increased credit risk associated with our lending portfolio. This is primarily due to the possibility of physical climate risk events, such as severe weather, leading to decreased capacity of bank customers to repay debt and/or physical damage to underlying collateral assets. In connection with our requirement to assess risk and manage our company in a safe and sound manner, we are required to understand and address the potential for increased credit risk associated with our lending portfolio. To that end, we are continuing to develop our capabilities to capture client carbon emissions data and assess client exposure to transition and/or physical risk.

Client Climate Questionnaire

In 2022, we developed a client climate questionnaire to help us better assess climate risk exposure at the client level and understand ways we can assist clients with their own climate risk mitigation. The client climate questionnaire helps us to evaluate risks and opportunities associated with a given client's decarbonization journey based on, for example, recent or planned initiatives that will reduce their emissions impact or help them mitigate their own physical risks.

In 2023, our Climate Risk team worked with Commercial Bank and Technology partners to pilot the questionnaire with a select group of portfolio and relationship managers, develop and facilitate relevant training, and integrate the questionnaire into our technology platforms for wider deployment. In 2024, we plan to significantly expand the pilot population to cover additional sectors and to train a wider group of portfolio and relationship managers on employing the questionnaire. We expect this will yield new insights regarding our clients' decarbonization journeys from both a risk and business perspective.

For more details on our client engagement strategy, see page [22](#).

Portfolio Risk Sensitivity Analysis

Another way we identify and evaluate potential exposure to climate-related risks is by monitoring and comparing the sensitivity of client sector portfolios to such risks. This includes leveraging insights from our client climate questionnaire and other in-depth research to inform qualitative assessments of the potential impact of transition and/or physical risk on different sectors. Results of our most recent assessment are summarized in a portfolio risk heat map available in our [2024 Climate Report](#). The outcome of this analysis is useful for informing potential new product solutions as we engage with clients in affected sectors, as well as providing a more granular understanding of how climate risks may impact our business. While evaluating potential climate exposure on an industry basis helps inform our credit and product analysis, we do not make credit decisions on an industry basis alone. Instead, credit decisions are made on the basis of the unique characteristics and financial position of the potential borrower.

Financed Emissions

We attempt to measure our financed emissions to assist us in monitoring our exposure to climate risk and understanding how we can support our clients in navigating the transition to a lower-carbon economy.

For year-end 2023, we completed an initial estimate for our business loan, commercial real estate, residential mortgage, and auto loan portfolios following the Partnership for Carbon Accounting Financials' (PCAF) Global GHG Accounting and Reporting Standard. This included extensive work to establish sources and protocols for addressing data gaps, including utilizing a cascading approach based on multiple data sources to provide baseline emissions estimates for nonreporting companies. In 2024, we are moving to make the estimation process more repeatable and to incorporate the additional data management and control protocols necessary to enable future external reporting.

Reducing Our Operational Emissions

We are committed to doing our part to address the environmental impacts of our physical operations, including reducing our energy use and GHG emissions.

Our operational GHG emissions are driven primarily by energy consumption in our buildings, which are powered by electricity and heated by multiple sources including electricity, natural gas, and heating oil. We also generate emissions through business travel, waste management, employee commuting, and our supply chain, which includes the purchase of goods and services.

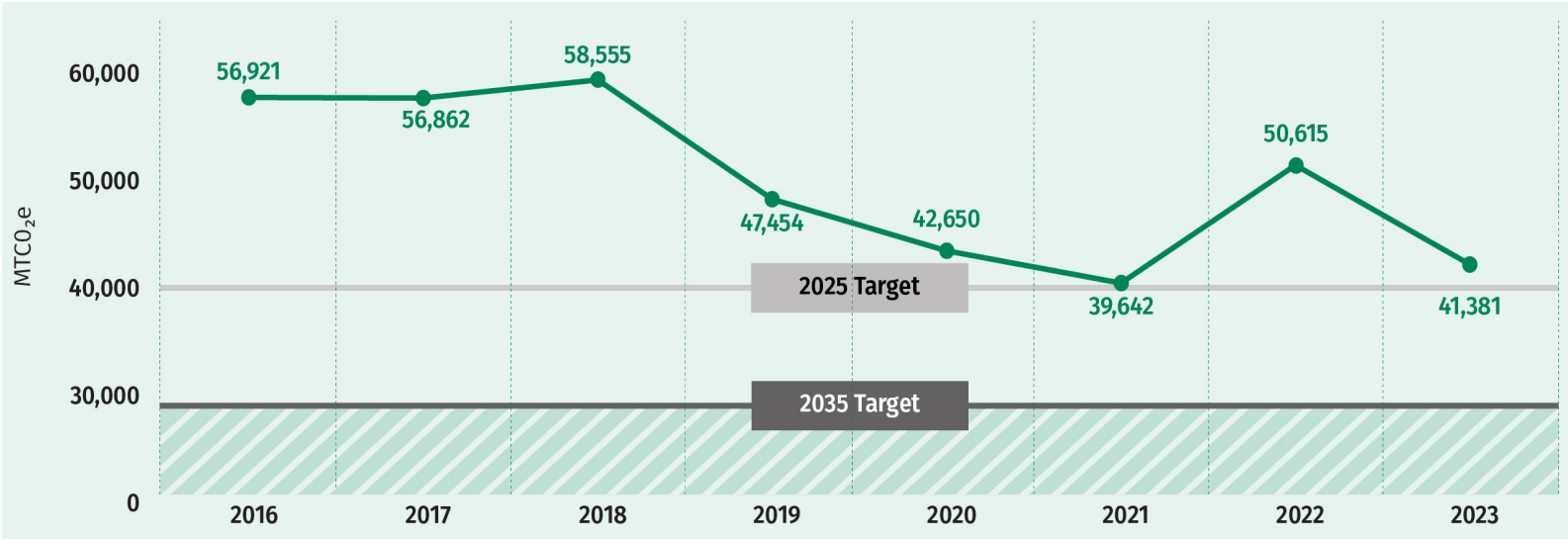
In 2021, we set targets to reduce our Scope 1 and 2 GHG emissions 30% by 2025 and 50% by 2035, compared to a 2016 baseline. These targets align with the goals of the Paris Agreement, including the ambition to limit the average global temperature increase to well below 2°C compared to preindustrial levels.

Citizens’ year-over-year cumulative Scope 1 and 2 emissions decreased by 18% in 2023, driven primarily by lower heating and cooling demands and site closures. Across the New England and Mid-Atlantic regions, we saw the average number of heating degree days and cooling degree days decrease by 10% and 19%, respectively, in comparison to the previous year. Following Citizens’ acquisition of HSBC’s East Coast footprint and Investors Bancorp, Inc. in 2022, our consolidating efforts resulted in a higher-than-average number of site closures in 2023, contributing to significant reductions in energy consumption. Our overall energy consumption decreased by 14% across our footprint.

To ensure consistency and accuracy, our environmental policy requires that we measure and track our performance in accordance with the GHG Protocol, and that our GHG inventory is independently verified. Our most recent CDP response can be viewed on our website and includes a complete summary of our operational emissions, with data segregated by scope and intensity metrics. Additional information is also available in our [2024 Climate Report](#).

GHG Emissions and Climate Targets

Summary of our Scope 1 and 2 GHG emissions performance (MTCO₂e, actual and estimates) and progress toward our stated targets.*



* Scope 2 emissions included in this summary reflect market-based emissions. Citizens’ Scope 1 and 2 emissions targets align with the goals of the Paris Agreement, including the ambition to limit the average global temperature increase to well below 2°C compared to preindustrial levels.

Driving Progress Toward Our Goals

Our strategy for driving progress toward our GHG reduction targets focuses on improving energy efficiency, optimizing our branch footprint, and supporting renewable energy.

Citizens invests annually in energy conservation measures that reduce emissions to achieve our targets, including transitioning to LED lighting; installing building energy management systems; and upgrading heating, ventilation, and air conditioning units.

We continue to optimize the design of our branch network in response to changing customer preferences and the opportunity to increase efficiency. In addition to consolidating select branch locations, we are deploying new designs with reduced square footage and other enhancements, resulting in lower energy use and emissions per branch.

While we aim to continue reducing our energy use and associated emissions, we also recognize the importance of meeting our remaining energy needs sustainably. In September 2022, we entered into a virtual power purchase agreement with Ørsted to support the construction of the Sunflower Wind Farm in Marion County, Kansas, with the intent to match the majority of Citizens’ power consumption across its operational footprint with renewable energy credits (RECs). In September 2023, the project became fully operational, allowing Citizens to begin taking delivery of its share of the associated RECs.

Committing to Carbon Neutrality

In 2023, we built on Citizens’ robust operational sustainability strategy with a commitment to achieve carbon neutrality by 2035. To do so, we will continue ongoing efforts to reduce our direct and indirect GHG emissions and address any remaining emissions through the purchase and retirement of high-quality carbon offsets. In addition, we will continue to support emerging efforts in the voluntary carbon market to increase transparency, better understand project integrity, and ensure that projects have the desired positive impacts they claim. Standards for our own procurement of offsets are outlined in the [Citizens Carbon Offset Program Framework](#).

Engaging Our Supply Chain

Our suppliers play a critical role in helping us execute our mission and we view their impact on the environment as an extension of our own. Our Supplier Code of Conduct outlines guidelines for suppliers, including the management of climate-related matters.

In 2023, we launched a formal supplier engagement program and invited an inaugural cohort of vendors to participate in the program. As of year-end, we exceeded our internal goal of engaging 35% of our vendors by spend for a total of 38%.

Empowering Communities

Citizens’ [Champions in Action](#) program is designed to support nonprofit organizations that address social challenges facing our communities. In 2023, the Champions for Energy Efficiency & Renewable Energy Award recognized several nonprofits for their dedication to building a more sustainable future by improving energy efficiency within their own operations or expanding access to clean or renewable energy services in the communities they serve. Recipients included Sustainable Princeton for its work to implement local solutions to positively impact the surrounding environment, and Clean Energy NH, which is leading New Hampshire’s energy decarbonization efforts.

We also help drive positive climate impact by enabling colleagues to volunteer in support of environmental causes in the communities where they live and work. For example, in 2023, more than 150 Citizens colleagues across eight states took part in Ocean Conservancy’s International Coastal Cleanup® initiative, helping to remove more than 720 pounds of trash before it could reach the water.

Building the Workforce of the Future

Developing the workforce of the future is critical to meet the acceleration of needed skills and capabilities across all generations. To meet this need, Citizens is making meaningful progress while adapting to the ever-changing landscape. We are expanding the pipeline for diverse talent, ensuring opportunities for growth and leadership, building a culture of belonging, and investing in organizations that provide upskilling and reskilling services. Through these efforts, we are making a measurable impact within and beyond Citizens that positions us and the communities we serve for the best possible tomorrow.

IN THIS SECTION:	
Creating an Inclusive Environment	28
Talent Attraction, Development, and Engagement	33
Addressing Community Workforce Needs	37

Creating an Inclusive Environment

Diversifying our teams, investing in our colleagues’ growth and development, and fostering an inclusive culture are at the heart of our Credo and culture. We are taking thoughtful and measurable steps to drive efforts that build a more future-ready, diverse, and inclusive workforce. Our Board’s Compensation and Human Resources Committee directly oversees our strategy and progress.

We are committed to creating an inclusive culture in our workplace and delivering products and services that meet the increasingly diverse needs of our expanding customer base. We also partner with nonprofits, local community leaders, and other external stakeholders to invest in programs that empower and uplift underserved communities. We invest in upskilling and reskilling individuals across our communities so they can be ready for the jobs of today and tomorrow.

In 2023, we continued to focus on embedding inclusion across our talent and business practices to ensure we are expanding the capabilities we offer to our colleagues and our customers. We made measurable progress, but there is also more to be done.

Our Approach	
For Our Colleagues	For Our Customers and Communities
Ensure our colleagues are valued, respected, heard, and feel a strong sense of belonging.	Mitigate bias in our business decisions while promoting fairness.
Embed inclusive capabilities and behaviors throughout our business practices.	Facilitate fair access to capital for small businesses and underserved communities.
Mitigate bias in our hiring and performance review decisions while promoting fairness and inclusion.	Work with community partners to build in-demand skills and capabilities for now and the future.
Increase diverse representation in our workforce , particularly in senior roles.	Support supplier diversity through inclusion of certified diverse businesses in our sourcing process.
Develop a talent pipeline and expand hiring slates representative of all dimensions of diversity.	Expand solutions for diverse market segments.
Build inclusive and highly collaborative teams to drive innovation.	

Fostering a Culture of Inclusion and Belonging in Our Workplace

Our approach to inclusion is grounded in understanding the needs and goals of our colleagues while providing education, resources, and tools to increase our organizational effectiveness. We regularly survey our workforce on a wide range of topics and use the results to refine our focus, address any gaps, and strengthen efforts to improve our organizational effectiveness and the colleague experience. Education and training also play a critical role in building a culture of belonging. Additionally, our growing number of business resource groups (BRGs) contribute to Citizens’ inclusive environment by bringing together colleagues with similar interests or other areas of commonality and engaging those communities to help strengthen our culture, fuel innovation across our business, and address critical needs in our communities. These groups provide networking opportunities, build awareness, fuel innovation, and foster a sense of belonging.

Surveying Our Colleagues

As part of our ongoing efforts to develop a high-performing workforce and make Citizens a great place to work and build a career, we transitioned to a new colleague listening platform in 2023 enabling multiple touchpoints to acquire feedback on colleague sentiment in an ongoing and iterative way throughout the year. This platform includes an Organizational Health Survey that serves as a leading indicator of organizational effectiveness and workplace culture. Overall inclusion results were among the most favorable surveyed at 78%, which exceeded global averages across every ethnic group. However, we did identify opportunities to ensure that all colleagues are experiencing the culture in similarly positive ways.

Building Inclusive Skills and Capabilities

Citizens’ leaders are the catalysts for achieving the culture we want to foster. Our dedication to learning and development has continued with tailored inclusive training and development resources for all our colleagues. In 2023, more than 3,456 colleagues completed our required Ignite Inclusion course, which focuses on valuing uniqueness, building belonging, and making fair decisions. More than 20,000 colleagues have taken this course since its launch in 2021.

Our approach to building diverse, trusting, and psychologically safe teams is further strengthened through our Inclusive Hiring and Inclusive Performance Reviews training. The former focuses on mitigating bias in the talent selection process, while the latter mitigates bias through coaching and performance discussions held throughout the year.

Business Resource Groups

Our BRGs provide members with a sense of belonging, professional growth, and access to senior leaders, as well as opportunities to make a difference in their communities. These company-sponsored, colleague-led groups serve as diverse sounding boards for company strategies, policies, and initiatives to ensure that we make decisions through a lens of inclusion and cultural sensitivity. They help inform our innovation pipeline and business growth agenda by sharing insights on workforce expectations, product development, multicultural marketing, customer service, and more. They also enhance our ability to recruit, retain, engage, and develop diverse talent.

Each BRG is sponsored by a member of our Executive Committee and chaired by a senior leader. In 2023, BRGs hosted listening sessions, organized volunteer opportunities with mission-aligned nonprofits, and welcomed internal and external thought leaders for inspirational conversations on timely topics. Additionally, BRG leadership teams participate in roundtable discussions with our CEO where they relay ideas from members, discuss business opportunities, and explore other topics impacting our colleagues, customers, and communities.

With the launch of Caring for Citizens in 2023, we now have seven BRGs advancing this important work (see the complete list at right). A community for parents and caregivers, Caring for Citizens supports and embraces families to strengthen the quality of our Citizens experience across colleagues and communities. This BRG attracted more than 600 members by the end of 2023.

More than 3,500 colleagues were members of at least one BRG at year-end, representing an increase of approximately 10% over 2022. Each of our BRGs identifies priority initiatives. For example, our Citizens Veterans BRG identified an opportunity to engage colleagues as mentors with American Corporate Partners, an organization that matches mentors with veterans and/or their partners to help as they transition from active service to civilian workplaces. The bank’s foundations granted \$100,000 to support the mentorship program.



Citizens Awake — Disability awareness



Caring for Citizens — Working parents and caregivers



Citizens Elev8 — Helping our colleagues and communities reach their potential



Citizens Pride — LGBTQ+ inclusion



Prism — Inclusive of cultures, heritage, and racial groups



Citizens Veterans — Supporting veterans, those who are serving, and their families



Citizens WIN — Women’s Impact Network

Increasing Diverse Representation in Our Workforce

Across virtually every category, we made incremental representation progress in 2023. We continued to deliver on our commitment to further diversify our workforce, with more than 48% of our new hires representing people of color, improving 9.5% since 2019. This partly reflects strong diversity in hiring, with 2,500 hires who are women and/or people of color.

We also continued efforts to expand the diversity of our recruiting pipeline and support innovative hiring programs. Among them, our Autism at Work program provides employment opportunities for those who are neurodivergent.

We have continued to make strategic investments to attract, hire, and retain highly talented employees from diverse groups. As part of these efforts, Citizens has forged partnerships with a variety of organizations. In 2023, our partners included:

- Anita B/Grace Hopper Celebration, the world’s largest gathering of women and nonbinary technologists, featuring a multiday career fair, keynote speakers, sessions, and networking.
- Association of Latino Professionals for America, the longest standing Latino organization in the country, with 100,000 members and 45 professional chapters.
- Certified Financial Planner Diversity Board Summit, a diversity-centric event to facilitate discussions on initiatives for a more diverse, inclusive, and equitable financial planning profession.
- Massachusetts General Hospital Aspire program, which helps individuals on the autism spectrum develop positive self-awareness, stress management, and social competency skills.
- National Black MBA Association, the largest network of Black professionals, with 41 local chapters and more than 20,000 members.
- Out in Finance, an organization that unites individuals across the financial services industry to drive LGBTQ+ inclusion and equality.

- Service Academy Career Conference, the only job fair exclusively for service academy alumni.
- Work Without Limits, a network devoted to increasing the employment of people with disabilities.

Strengthening Our Diverse Talent Pipelines

Year Up is a nonprofit committed to closing the opportunity divide for young adults — many of whom are Black, Hispanic/Latino, or Indigenous — by providing them with skills, experiences, and support to help them achieve their higher education and career goals. Our 18-year partnership exemplifies our efforts to develop a diverse talent pipeline. We welcome Year Up participants with the intent of providing them with training and hands-on work experience over the course of a six-month program, preparing them for future employment, including at Citizens.

Since the inception of our partnership in 2005, we have hosted more than 370 Year Up participants, including 61 in 2023. From the 2023 cohort, we hired 24 graduates into open roles in retail banking, commercial operations, and other departments.

Among our other workforce development initiatives, BankForward engages low- and moderate-income communities, especially communities of color, in a partnership to increase diversity and opportunities in the financial services sector. In doing so, it empowers individuals who may have felt that a career in banking was out of reach.

We were also recognized for our diversity efforts by several leading organizations. (See the list at right to learn more about our external recognition.)

External Recognition

[Bloomberg Gender-Equality Index \(GEI\)](#)

For the second consecutive year, Citizens was named to the Bloomberg GEI, which tracks the performance of public companies committed to disclosing their efforts to support gender equality through policy development, representation, and transparency.

[Fair360 Top Regional Company](#)

Citizens was ranked 11th on Fair360’s (formerly DiversityInc) 2023 list of top regional companies for our inclusion efforts.

[Best Places to Work for Disability Inclusion](#)

Citizens earned a 90% score on the 2023 Disability Equality Index®, making us a “Best Place to Work” for the third consecutive year.

[National Organization on Disability \(NOD\) Leading Disability Employer Seal](#)

Citizens was among 64 companies in 2023 awarded the NOD seal, which is presented to top performing companies that complete the NOD Disability Employment Tracker™.

[Human Rights Campaign Foundation’s Corporate Equality Index \(CEI\)](#)

Citizens received a top score of 100 on the 2023-2024 CEI.

[Certified Age-Friendly Employer \(CAFÉ\)](#)

Citizens received CAFÉ recognition from the Age-Friendly Institute in 2023 for outstanding achievement in the creation of an age-friendly workplace.

[Military Friendly® Employer](#)

Citizens was named a Military Friendly Employer for 2024 in recognition of our support for veterans and military families.

The tables on this page reflect our colleague demographics as of year-end 2023, including an overall breakdown by gender, race and ethnicity, and job function (in line with our EEO-1 reporting), and total colleagues and new hires by gender, region, and age group. We remain committed to continuing our progress on diverse representation.

2023 Workforce Diversity

Data is reported in accordance with the categories required in our annual EEO-1 report. Our full 2023 EEO-1 report is available on our [website](#).

EEO Job Group	Male	Female	White	Black/African American	Hispanic/Latino	Asian	American Indian/ Alaska Native	Native Hawaiian/ Other Pacific Islander	Two or More Races
Executive-/Senior-Level Managers	68.0%	32.0%	88.7%	1.0%	4.1%	5.2%	0.0%	0.0%	1.0%
First-/Mid-Level Managers	55.3%	44.7%	75.9%	6.8%	5.7%	10.2%	0.1%	0.0%	1.4%
Professionals	54.7%	45.3%	69.5%	5.8%	6.5%	16.0%	0.2%	0.2%	1.9%
All Other*	33.1%	66.9%	60.3%	14.5%	13.9%	7.9%	0.2%	0.1%	2.9%
Total Workforce	43.8%	56.2%	66.3%	10.5%	10.1%	10.5%	0.2%	0.1%	2.3%

* “All Other” is a combination of the following EEO-1 job categories: sales workers, administrative support workers, craft workers, and service workers.

Data as of Dec. 31, 2023.

2023 Colleague and Hiring Data

Total Colleagues		
Total Number of Colleagues		17,684
Full-time		17,186
Part-time		498
% Female	Full-time	56%
	Part-time	77%
% Male	Full-time	44%
	Part-time	23%
% Undisclosed	Full-time	0.01%
	Part-time	-

Colleagues by Region	
New England	8,034
Mid-Atlantic	4,834
Midwest	1,608
Other	3,208
Colleagues by Generation	
Silent Generation: 1935-1945	14
Baby Boomers: 1946-1964	2,511
Generation X: 1965-1980	6,420
Millennials: 1981-1996	6,915
Generation Z: 1997-present	1,824

New Hires by Gender	
Female	1,728
Male	1,741
Undisclosed	-
New Hires by Region	
New England	1,300
Mid-Atlantic	1,005
Midwest	295
Other	869

New Hires by Generation	
Silent Generation: 1935-1945	3
Baby Boomers: 1946-1964	193
Generation X: 1965-1980	755
Millennials: 1981-1996	1,611
Generation Z: 1997-present	907

Data as of Dec. 31, 2023.

Pay Equity

Our commitment to pay equity is an important aspect of building an inclusive culture where our colleagues feel heard, valued, and respected. Managers are provided with tools and resources to make appropriate compensation decisions. In addition, manager-submitted rating and compensation recommendations are reviewed to ensure that they are fair and equitable.

For the past several years, we have engaged an independent third-party firm to conduct an annual pay equity analysis. This review covers all of our operations and colleagues and considers factors that appropriately explain differences in pay, such as performance and experience, in analyzing base salary, cash bonuses, and equity awards for colleagues serving in similar roles. Pay adjustments are made if job-related factors do not explain a disparity.

Women are paid 99% of what men are paid in similar roles, and racially diverse colleagues are paid 100% of what white colleagues are paid in similar roles. Although these are strong results, we understand that the opportunity gap for women and people of color continues to exist. We remain committed to the programs we have in place to help facilitate, among other things, increasing the representation of women and people of color in senior and leadership roles over time.

Supporting Diverse Supplier Growth

We remain committed to ensuring that certified diverse businesses can compete for opportunities across the Citizens value chain. In 2023, we built on our long-standing efforts to engage diverse suppliers by providing additional opportunities for underrepresented populations. We also exceeded our \$200 million goal for spend with diverse suppliers and established new relationships with more than 30 of them. For 2024, we are continuing our commitment to \$200 million in diverse spend, with the addition of 15 new diverse vendors.

Our [Supplier Code of Conduct](#) articulates our expectations for suppliers to integrate strong diverse and inclusive policies and practices into their businesses to create an inclusive workplace. This includes maintaining talent recruitment and development programs and cultivating relationships with diverse third-party vendors. Our vendors are an essential part of our vision for a supply chain that is diverse, inclusive, reflective of the markets we serve, and accessible and efficient for all suppliers with whom we work.

Talent Attraction, Development, and Engagement

Attracting, developing, and retaining high-performing colleagues from a diverse set of backgrounds determines our success as a company. Our culture is one where colleagues feel appreciated for their contributions and can thrive personally and professionally. We continually look for opportunities to evolve and strengthen our culture.

We are also continuing to digitize and transform our ways of working to meet evolving customer needs, while enabling our colleagues to build the skills and capabilities they need to grow and advance in their careers. This includes supporting each colleague's unique personal and professional journey with best-in-class tools, resources, and benefits.

Talent Attraction

Recruiting talented professionals in fluctuating labor and economic markets, coupled with high candidate expectations and our entrance into new geographic areas, has required Citizens to adapt our talent acquisition strategies.

Candidates expect to move through the recruiting cycle quickly and be treated with respect. Our Candidate Promise is a pledge to show all candidates that we appreciate their interest in a career with us — regardless of whether they are hired — by giving them a personalized experience and communicating with them every step of the way. To improve the candidate experience and bring quality talent into the company more quickly, we implemented a new applicant tracking system and used automated scheduling tools to allow candidates and hiring managers to choose their interview day and time. We recognize that candidates don't apply for new roles within the 8 a.m.–5 p.m. workday. Our award-winning AI-powered chatbot is available 24/7/365 to answer questions about our benefits, culture, and more.

We champion the growth and empowerment of colleagues from all backgrounds, abilities, and life experiences. We want to build a workforce that better represents our communities and customers. To do so, we prioritize ongoing education for talent acquisition colleagues that focuses on driving inclusivity in recruiting.

We aim to have 50% of candidates interviewed be women, people of color, or a combination of both. In 2023, we achieved a diverse candidate interview slate more than 72% of the time, up from 69% in 2022. Through partnerships with a variety of organizations, we have also focused on recruiting from the LGBTQ+ community and bringing greater neurodiversity into the workforce.

Beyond our focus on recruiting externally, Citizens has more than 17,500 talented individuals with a wide array of skills and experiences. We believe it's our responsibility to help colleagues realize a fulfilling career. We offer programs, upskilling and networking opportunities, and advice that enable colleagues to build the careers they want. In 2023, nearly 30% of all open positions were filled by existing colleagues.

Performance Enablement

Our Performance Enablement framework is critical to driving beneficial organizational outcomes by helping our colleagues perform at their best while supporting learning and growth opportunities. Citizens achieves this through promoting and enabling continuous feedback and coaching, with an emphasis on meaningful conversations. As part of the framework, colleagues establish performance and development goals and review progress with their managers during midyear check-ins as well as year-end performance reviews. Outside of those touchpoints, we encourage and support ongoing "check-in" conversations regarding colleagues' goals and growth.

Growth and Career Development

Citizens is preparing our colleagues for the future by supporting growth and development and empowering them to navigate and drive their own career journeys. We are committed to a culture of continuous learning and an environment where colleagues build the skills necessary to excel in their current and future roles. Growth and development opportunities are key to driving retention in today's competitive talent landscape.

We continue to expand development programs and learning experiences that support colleagues and build skills for the future through resources such as the Citizens Learning Hub. In 2023, more than 81% of colleagues used the Citizens Learning Hub for professional skills training and completed over 452,000 hours of learning and development (inclusive of professional skills and compliance training). In addition, more than 5,100 colleagues attended our Citizens Academies which offers learning experiences to build critical skills that better equip colleagues to succeed. Each academy has learning experiences that provide pathways for growth and recognition. In 2023, approximately 30% of open job requisitions were filled by colleagues, demonstrating how our development programs and learning experiences are preparing colleagues for success.

312,600+

hours of professional skills training completed

+

139,800+

hours of compliance training completed

= 452,500+

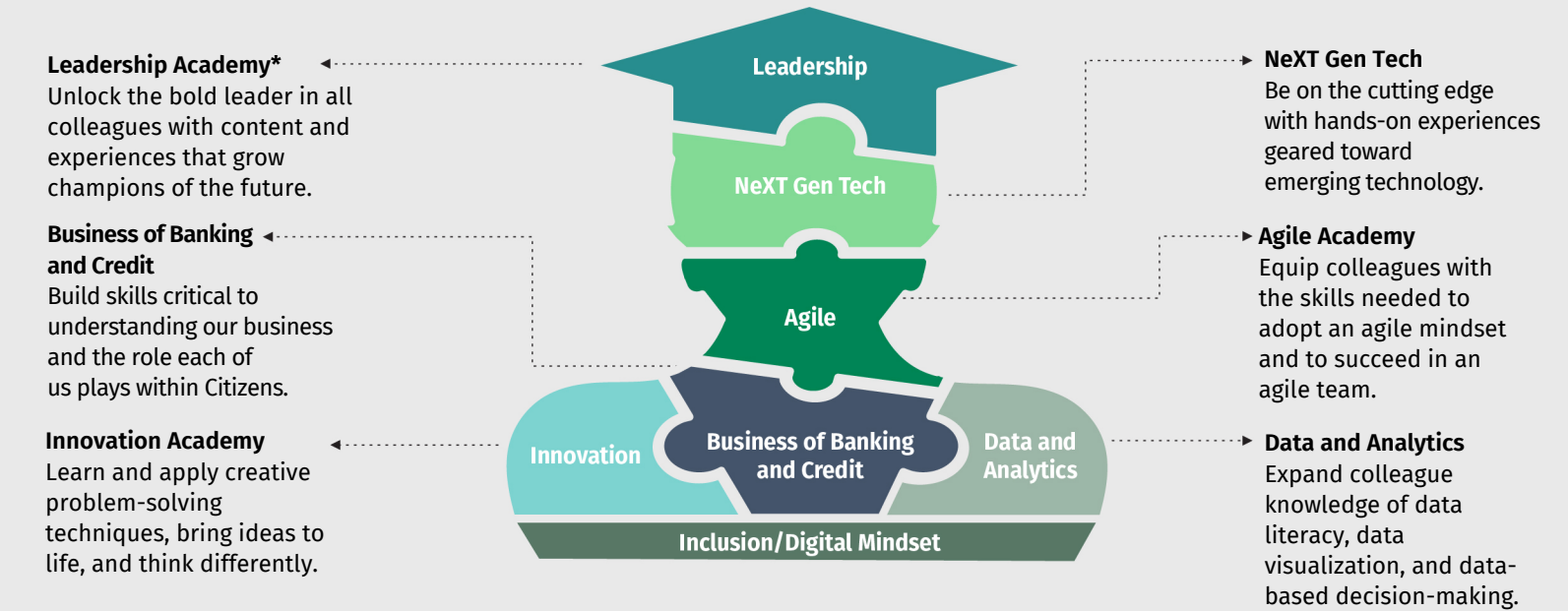
hours of learning and development completed

1,300+

colleagues completed leadership and management training

Citizens Academies accelerate the upskilling of all colleagues in capabilities that are in demand and will propel our performance and growth.

OUR SIX CITIZENS ACADEMIES



* Includes Inclusion Leadership courses prior to 2024.

Colleague Engagement

Getting insight into our colleagues’ perceptions of Citizens is vital to our ongoing efforts to develop a high-performing workforce and make Citizens a great place to work and build a career. The new OHS listening platform includes a colleague survey tool aimed at providing valuable insights as we continue to evolve our strategy and culture.

Like our previous platform, it focuses on our progress in areas such as leadership, innovation, development, motivation, and commitment — as well as other aspects we feel are key to our organizational effectiveness and colleague satisfaction.

Let’s Connect

We use a variety of platforms and forums to facilitate open and direct communication with colleagues, including “Let’s Connect LIVE” streaming sessions hosted by our CEO and members of our Executive Committee. They reach an average of 2,300 colleagues per session. Colleagues are able to hear from leaders and ask questions on wide-ranging topics. For example, we discuss innovative solutions to complex business topics, ways in which Citizens invests in our workforce, how we deliver for our customers, and our progress in executing our strategy.

In 2023, we also hosted 199 smaller group and one-on-one sessions connecting senior leaders with over 3,200 colleagues.

Colleague Volunteerism

Our colleagues are central to — and take great pride in — our philanthropic efforts. This starts with our senior leaders, who serve as hands-on champions of our volunteer efforts by actively engaging with community activities and programs. Colleagues served on over 1,000 community boards and/or committees in 2023, lending their expertise to organizations that provide vital services across our footprint. In total, more than 8,800 colleagues logged over 232,000 volunteer hours during the past year, a 33% increase compared with 2022.

In 2023, colleagues logged over 61,000 skills-based volunteer hours which includes nonprofit board and committee service along with targeted volunteer efforts where colleagues use their skills and experience to benefit an organization. This past year, Citizens hosted three skills-based volunteer days of service which brought together 217 colleagues to work with 18 nonprofits.

Through our payroll giving campaign, colleagues pledged over \$412,000 to nonprofits. Additionally, the Citizens Charitable Foundation amplified our colleagues’ personal donations with more than \$1.1 million in matching gifts.

Recognizing Our Colleagues

Citizens embraces a culture of recognition where colleagues are valued and rewarded for their contributions and achievements. Through our multifaceted Credo Awards program, colleagues can provide real-time recognition for living our values and driving innovation, as well as celebrating career milestones, special moments in their lives, and participation in community events. In 2023, more than 92% of colleagues received over 170,000 Credo Awards.

In 2023, we recognized 332 colleagues as Credo Champions at our annual Credo Champion event. These individuals demonstrate an exceptional commitment to our customers, colleagues, communities, and shareholders. Business-line leaders review top Credo Awards recipients and nominations submitted by colleagues to select Credo Champions.

We also celebrate colleagues who embody the Citizens spirit of volunteerism and innovation. The Chairman’s Community Awards honor 10 colleagues for their leadership in serving others and inspiring colleagues to give back, while the Chairman’s Innovation Awards recognize 10–12 colleagues who demonstrate novel approaches to solving customer and colleague problems or who otherwise exhibit innovative behaviors and mindsets in their work.

Innovation at Citizens

Innovation is in our DNA, and we constantly challenge colleagues to find new ways to do more for our customers. More than 1,200 colleagues participate in our Innovation Forum, where they advance new ideas to drive our success and better serve our customers. These colleagues engage regularly, either during the Forum’s monthly meeting and/or via our internal collaboration sites, to discuss bankwide initiatives, new product developments, and broader implications of innovation in the financial services industry, including those related to environmental, social, and governance topics.

The Innovation Academy is a collection of courses, industry resources, and forums to help colleagues develop critical skills to experiment and translate ideas into valuable solutions for our customers.

Keeping Our Colleagues Healthy

Citizens is committed to supporting our colleagues’ unique journeys and investing in benefits, resources, and programs to enable their well-being across all dimensions of their lives. Supporting “whole-person well-being” means encouraging colleagues to infuse healthy habits into the way they live and work, helping them thrive. Our benefits programs are designed to support colleagues’ physical, mental, and financial well-being, with programs that offer access to services such as telehealth, digital physical therapy, retirement readiness modeling, and more. In 2023, we granted colleagues a wellness day — an additional paid time off day to focus on their personal wellness — and increased our paid bereavement leave from five to 15 days for immediate family members to grieve and fulfill family obligations. We also added to our collection of 24/7 digital resources with sleep, anxiety, and chronic pain management programs and enriched our fertility benefits, ensuring they are inclusive for families of all types.

Through our annual Step Up to Make a Difference program, colleagues are encouraged to come together in teams to get active for a good cause. This year, during the three-week campaign in October, more than 3,600 colleagues donated their time and effort to take 625 million steps. As part of the campaign, the Citizens Charitable Foundation contributed \$140,000 to nine nonprofit organizations.

Addressing Community Workforce Needs

As a super-regional bank, Citizens is uniquely positioned to help ensure our clients and communities have the diverse and skilled talent needed to achieve the best possible tomorrow. We strive to use our reach, innovation, and insights to build impactful partnerships that drive lasting change on a local level. By supporting community organizations providing upskilling and reskilling services, we are creating new pathways for diverse and low- and moderate-income communities to enter in-demand, well-paying careers.

Regional Workforce Events

In building and developing the workforce of the future, Citizens takes a community-driven approach. Since 2021, Chairman and CEO Bruce Van Saun and Citizens' market leaders have regularly hosted workforce roundtable discussions in markets across our footprint to better understand local workforce challenges and discuss viable solutions. In 2023, Van Saun hosted discussions with industry, civic, and community leaders in Rhode Island, New Jersey, Pittsburgh, and New York City. Participants addressed issues such as challenges pertaining to an aging workforce and systemic barriers for diverse candidates and together developed strategies and ideas on how to work together to drive change.

Through these events, we strive to serve as a bridge between local companies looking to fill critical roles and education and community organizations that provide upskilling and reskilling programs to students and workers looking to advance their careers. The insights gained during these events help inform our funding decisions to ensure that we are supporting community-driven and informed programs that are positioning our communities for long-term success.

Partnering With Nonprofits and Other Community Organizations

We know that partnerships are essential to addressing complex workforce challenges. Citizens is committed to listening to the needs of our communities and helping close the skills gap by creating innovative and impactful partnerships with nonprofits that prepare people for the workforce of tomorrow.

In 2023, we continued to expand investment in Citizens Community College Accelerator through our work with Education Design Lab (see box on the next page). Additionally, we used our industry insights and local relationships to support a variety of local organizations and initiatives across our footprint.

- In Pittsburgh, our \$350,000 contribution to [The Andy Warhol Museum](#) in part supported careers in the arts by funding 28 fellowships to support the museum's digital content and production.
- In New York City, Citizens and its Philanthropic Foundation provided \$300,000 in funding to the [Queens Night Market](#) to underwrite the cost of vendor fees, so local entrepreneurs can test new ideas and grow their businesses with low overhead costs. As part of our involvement, Citizens also invited vendors to participate in business seminars through [NYC Small Business Services](#) in Queens and Brooklyn.
- Also in New York City, we provided a \$100,000 Citizens Philanthropic Foundation grant to [Pursuit](#), a New York-based nonprofit whose long-term intensive program trains adults with the most need and potential to get their first tech jobs, advance their careers, and become part of that industry's next generation of leaders.
- In Rhode Island, Citizens announced a \$600,000 commitment to support much-needed technical skills training and career counseling across the state, including support for training programs through the [YMCA of Pawtucket](#), [Davies Career and Technical High School](#), [Genesis Center Culinary Hub of Providence](#), [Rhode Island Hospital](#), [Crossroads Rhode Island](#), and [BankForward](#).
- In New Jersey, we announced a \$700,000 commitment to support workforce initiatives, including [Oasis](#)' new Career Counseling program for low-income minority women and [LISC Greater Newark](#).
- In Massachusetts, we provided more than \$1 million in funding to support workforce initiatives, including a \$85,000 contribution to help launch the YMCA of Greater Boston's innovative Early Childhood Apprenticeship Program that is helping create new pathways for prospective early childhood educators to receive paid on-the-job training.
- Citizens and its Philanthropic Foundation also invested \$135,000 across multiple markets in programs offered by [Per Scholas](#), which provides technology skills training to individuals often excluded from such careers.

Local nonprofits play a critical role in addressing community needs. Since 2002, the Citizens [Champions in Action](#) program has given more than \$10 million in unrestricted funds to celebrate and support over 370 local nonprofits with annual budgets of less than \$5 million that are driving meaningful change. Each champion received \$35,000 in funding, plus promotional and volunteer support from Citizens colleagues. In 2023, this flagship program recognized six nonprofits focused on providing youth summer workforce programming. For example, [Riverzedge Arts](#) uses innovative applied and work-based learning strategies to teach art, design, and critical thinking to the youth of northern Rhode Island. We also supported six nonprofits working to promote environmental sustainability in their communities. In total, these 12 organizations received \$420,000 to advance their missions and deliver a lasting impact.

Building New Career Pathways With Education Design Lab and Citizens’ Community College Accelerator

Since 2021, Citizens has partnered with Education Design Lab (EDL) to accelerate workforce development innovation through our Citizens Community College Accelerator.

Designed to address the growing skills gap, our innovative partnership brings EDL’s Community College Growth Engine to communities and demonstrates the important role community colleges can play in building a diverse and inclusive workforce in local communities. Through this public-private partnership between community colleges and local employers, EDL cocreates “micropathways” that provide training aligned to regional labor market demand. For adult learners, underserved populations, first-generation students, and returning veterans, micropathways enable students to pursue role-specific trainings that lead directly to living-wage jobs. They can also stack to a degree.

To date, Citizens has invested more than \$1 million to expand the partnership to eight community colleges in Boston, Rhode Island, Philadelphia, New York City, and Pittsburgh.

Fostering Strong Communities

Supporting healthy, thriving communities is the cornerstone of our Credo and a key driver of our success. Across the Citizens footprint, we endeavor to strengthen communities by expanding economic opportunity and closing the wealth gap. We fund social equity partnerships and programs working with small businesses in underrepresented communities, boost homeownership, expand affordable housing, and develop innovative products and services that benefit traditionally underserved populations.

IN THIS SECTION:

Community Development Financing	40
Offering Innovative Products and Better Access to Capital	42
Fair and Responsible Banking	42
Citizens Helping Citizens	43

Community Development Financing

Citizens is committed to being a leader in community development. We accomplish this, in part, by delivering innovative products and services that support and stabilize neighborhoods, including the creation and preservation of affordable housing. In addition, Citizens provides financial education and engages business-line partners to support the financial needs of minority and underserved communities.

Funding Community Revitalization and Affordable Housing

Access to affordable housing is critical to the long-term financial security of families. Citizens is committed to helping build the housing supply in the communities we serve by providing both debt and equity to support the development and preservation of affordable housing. Since 2013 we have provided nearly \$8 billion in debt and equity to support the creation or rehabilitation of nearly 50,000 housing units, impacting approximately 565,000 individuals.

In 2023, we invested approximately \$500 million in Low-Income Housing Tax Credit developments and other community development projects, helping to provide over 3,200 affordable housing units in our communities. Below are just a few of the projects in which we participated:

- Citizens provided more than \$23 million in financing to enable the substantial renovation of 144 units of affordable housing in Philadelphia.

- In Brooklyn, New York, we provided more than \$36 million in financing for the renovation of 55 units of affordable housing.
- We provided more than \$67 million in financing for the renovation of 222 units of affordable housing in Medford, Massachusetts.

Citizens also offers a product for nonprofits engaged in the preservation of multifamily affordable housing stock by providing financing for up to 95% of the purchase price toward the acquisition of existing stabilized multifamily developments. This helps nonprofits in highly competitive real estate markets compete with market-rate developers to acquire existing developments and preserve affordable housing opportunities.

Additionally, we continued to deliver on our commitment to provide \$300 million in premium-priced investments in affordable housing projects in majority-minority census tracts by the end of 2025. The incremental capital created by the premium we pay helps address the digital divide by providing facilities and services — at no cost to residents — including technology centers with computer workstations, internet connectivity, tutoring services, and professional job training/coaching. Through year-end 2023, we provided approximately \$170 million in funding for Housing Tax Credit developments.

\$1.3 billion

in total equity and loan commitments provided to community-development-qualified initiatives

5,000+ units

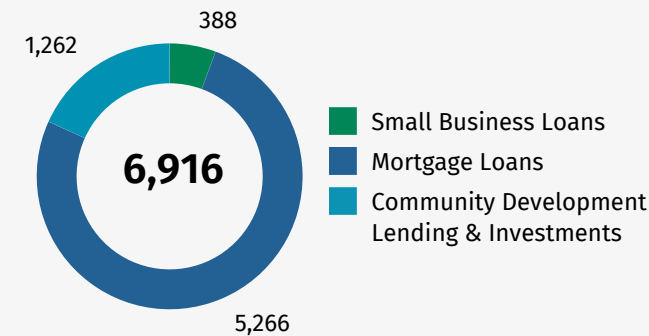
of affordable housing provided

Financing to Support Social Activities

The ambitious Sustainable Finance Target we announced in 2023 will finance and facilitate \$50 billion to drive credible and tangible impact by 2030. This includes initiatives that support the well-being of society by advancing economic inclusion, increasing access to basic infrastructure and essential services, boosting employment generation, and providing affordable housing.

In 2023, we financed and facilitated a total of \$6.9 billion in support of qualifying social initiatives, including \$388 million in small business loans, almost \$5.3 billion in mortgage loans for underserved communities and affordable housing, and nearly \$1.3 billion in community development lending and investments.

(\$ in millions)



Boosting Homeownership

H homeownership is a primary goal for many individuals and families and a vital ingredient for community wealth building. We work closely with customers to understand their needs and help them determine if homeownership is right for them. We support their decision-making process with clear terms, sound advice, and, where appropriate, mortgage products tailored to meet the needs of first-time homebuyers and low- and moderate-income (LMI) families.

We are committed to boosting homeownership and affordable housing options for underserved communities, including LMI or minority borrowers, or those in LMI or majority-minority census tracts. In 2023, we provided more than 18,000 home mortgage loans totaling \$5.3 billion for such borrowers.

Destination Home Mortgage™, our flagship affordable housing loan program, provides first-time homeowners the opportunity to receive lower rates and flexible underwriting requirements.ⁱⁱ In 2023, we originated a record-high of \$129 million in loans under this program. Customers in the LMI category and those purchasing a home in an LMI neighborhood can qualify for the program, which allows a lower down payment without mortgage insurance.

The program can be combined with approved community seconds, which enable borrowers to leverage grants from the community, nonprofits, and employers as a source of funding for closing costs and down payment assistance. We also help address a key element of the homebuying affordability gap by providing closing cost assistance grants to eligible LMI homebuyers or customers purchasing homes in LMI census tracts. We provided nearly \$6 million in closing cost assistance grants in 2023.

Supporting Small Businesses in Underrepresented Communities

Small businesses in underrepresented communities are the lifeblood of our communities, providing valuable goods and services and creating local jobs. They also play a critical role in creating sustainable economic pathways to close the wealth gap. At Citizens, we help valued customers manage and grow their businesses through a portfolio of tools, resources, products, and advice tailored to their unique needs.

In 2023, we provided more than 6,700 loans totaling \$388 million to businesses with sales less than or equal to \$1 million, or located in LMI or majority-minority census tracts. We also continue to invest in small business capability building through training programs, lunch-and-learn sessions, and other resources to help entrepreneurs run and grow their businesses.

Through our Small Business Community Champion Awards program, launched in 2018, Citizens has awarded financial prizes to woman-owned, minority-owned, or other qualified businesses across our branch footprint. This funding recognizes the positive impact these passionate owner/operators are making in their communities, while also seeding their future growth and success. In 2023, we awarded \$10,000 each to 30 qualified businesses selected from almost 9,000 applications.

Economic Opportunity Fund for Underbanked Businesses

The Citizens Economic Opportunity Fund (EOF) provides critical capital to underbanked businesses through partnerships with community development financial institutions (CDFIs) and small business loan funds. In 2023, we invested \$12 million to support them. Since its launch in 2020, our EOF has contributed \$65 million to 23 CDFIs and other financial intermediaries.

In addition to financing, the EOF provides operating funds for entrepreneurial training programs in which we pair Citizens Business Banking Relationship Managers with small businesses to provide them with training and support. After the training, participants compete in a business-pitch-style competition to display their newly learned knowledge. We have contributed \$700,000 in awards to this competition since 2020.

Through the EOF we have funded the entrepreneurial training program of the [ProsperUs Detroit](#) CDFI for the past three years. ProsperUs works to advance economic equity in under-resourced communities by supporting entrepreneurs with opportunities and capital needed to build businesses, generational wealth, and vibrant neighborhoods. Its entrepreneurship training program includes 12 interactive group training sessions along with 10 one-on-one coaching sessions per participant. Among other 2023 recipients, our EOF helped fund the [She Means Business](#) training program by PathStone Corporation in Rochester, New York. This virtual, seven-week intensive program is designed to take women entrepreneurs through the steps and processes needed to succeed.

Offering Innovative Products and Better Access to Capital

Citizens strives to provide all customers with an exceptional banking experience that exceeds their expectations. We offer several products and features designed to increase accessibility and transparency while continuing to drive customer satisfaction. [Citizens Peace of Mind®](#) helps customers avoid unexpected fees by monitoring and alerting them when they overdraft.ⁱⁱⁱ Overdraft fees are automatically reversed if customers transfer funds to bring their account to a positive balance before the close of business the following day.^{iv} [Citizens EverValue Checking™](#) is an overdraft-free checking account designed to increase banking access for underbanked and underserved communities. It has been certified by the Cities for Financial Empowerment Fund as meeting the [Bank On](#) National Account Standards. [Citizens GoalBuilder®](#) Home Equity Line of Credit offers expanded borrowing options for LMI homeowners, supporting our commitment to boost homeownership in underserved communities.ⁱⁱ

Fair and Responsible Banking

Our commitment to fair and responsible banking practices is fully integrated into our product governance process. Our Office of Fair and Responsible Banking, which is part of our Compliance Department, is charged with ensuring our products are fair and inclusive; are communicated accurately, clearly, and comprehensively in all Citizens materials; and are implemented equitably.

Strong governance routines are embedded in our product development and marketing processes to drive clarity and inclusivity. Our Board’s Risk Committee oversees policies governing our commitment to fair and responsible lending, as well as our compliance with Unfair, Deceptive, or Abusive Acts or Practices (UDAAP) requirements. UDAAP can cause significant financial injury to consumers, erode consumer confidence, and undermine the financial marketplace. Under the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act), it is unlawful for any provider of consumer financial products or services or a service provider to engage in any unfair, deceptive, or abusive act or practice.

Representatives from both our Compliance and our Community Development teams engage in our cross-functional product development process. Additionally, all new products or services — or changes to existing products or services — undergo a formal risk assessment to ensure compliance with fair banking requirements (and other areas). Risk governance and management forums provide additional oversight of new products or significant updates.

Citizens’ commitment to fairness and responsibility extends to how we service our accounts. Our Compliance team is actively involved in designing our customer service processes to ensure we deliver a fair and equitable experience to our customer, every time. All colleagues that interact with customers, or perform functions affecting them, complete annual UDAAP standards training. In addition, under the fair and responsible banking program, the bank offers annual role-based training in the areas of fair and responsible lending and compliance with the Home Mortgage Disclosure Act.

Responding to Customer Complaints

We actively listen to our customers and value all feedback — including complaints. Every comment, question, and interaction provides an opportunity to improve our products, processes, and services. Customers can reach us through a variety of channels, including interactions with Citizens colleagues, social media, our branch network, and Call Center. A dedicated team reporting to the Office of the Customer handles complaints and our company’s centralized feedback management process. These customer service advocates guide the process to resolution, serving as a consistent point of contact for customers. We also use data from internal and external sources to track, evaluate, and enhance the customer experience.

Citizens Helping Citizens

Citizens Helping Citizens, our holistic platform for giving back to local communities, encompasses our philanthropic giving and volunteer outreach. We dedicate time, resources, and talent to foster the well-being of our neighbors and neighborhoods with a focus on financial empowerment and workforce development. Through financial investments and colleague engagement, we aim to advance social equity, close opportunity gaps, and revitalize local communities. Helping people realize their potential in this way creates new growth opportunities for Citizens as well.

\$20+ million

provided in 2023 to support community programs through Citizens, Citizens Charitable Foundation, and Citizens Philanthropic Foundation

232,000+

in-person and virtual volunteer hours logged in 2023

8,800+

colleagues volunteered in 2023, a 33% year-over-year increase

3,340+

organizations supported

Delivering Financial Empowerment Programs

We help our communities by supporting programs that give people the confidence and tools they need to budget, save, invest, be financially healthy, and inspire them to pursue their goals. Through our colleague volunteerism, partnerships, and programmatic support, we provide our neighbors with the resources and tools they need to make informed financial decisions.

In 2023, we provided approximately \$2.3 million to financial empowerment programs that helped individuals, families, and small businesses build financial acumen. Our Citizens Helping Citizens Manage Money program focuses on helping people become financially knowledgeable and develop healthy money management habits.

We also continued our partnership with [Junior Achievement USA \(JA\)](#), a national organization dedicated to preparing young people for economic success. We helped provide financial education to approximately 5,400 students across 23 LMI communities. Colleague volunteers brought JA programs to life, hosting financial education and empowerment workshops, providing income tax assistance, and mentoring individuals to help them develop financial confidence.

Among our 2023 activities, we held a JA in a Day event in June in collaboration with our Elev8 business resource group at Rhode Island’s Segue Institute for Learning. JA in a Day exposes students of all ages to lessons in financial empowerment, and 34 colleagues volunteered throughout the day. For our JA work, Citizens was presented with a Bronze President’s Volunteer Service Award for the 2022–2023 school year. This presidential recognition program was created by the President’s Council on Service and Civic Participation for individuals and organizations that contribute a significant amount of time to volunteer service.

VITA Volunteerism Across Our Markets

Citizens colleagues volunteered at IRS [Volunteer Income Tax Assistance \(VITA\)](#) sites in 2023, serving as intake specialists, translators, and, in some cases, tax preparers. For LMI individuals, persons with disabilities, senior citizens, and taxpayers with limited English skills, the VITA program has long provided free basic tax return preparation. In 2023, local governments and nonprofit partners staffed approximately 3,200 VITA sites in all 50 states and the District of Columbia, and they helped generate \$1.8 billion in federal tax refunds on returns for the 2022 tax year.

In New Hampshire, for example, Citizens volunteers gave their time to the VITA initiative led by [Granite United Way](#). This organization helped more than 2,700 taxpayers file their federal tax returns and claim about \$2.9 million in refunds. Granite United Way also helped filers save an estimated \$809,000 compared to the cost of going to a commercial tax preparer.

Helping Make New Workforce Opportunities a Reality

Citizens has devoted significant resources to nonprofits that help create workforce opportunities for individuals from LMI neighborhoods. These organizations provide valuable upskilling and reskilling services that establish new pathways to in-demand, well-paying careers. Our commitment is broad-ranging and includes partnerships with national organizations such as [Year Up](#), [Education Design Lab](#), and [Per Scholas](#). Across our footprint, we also support the workforce initiatives of dozens of other organizations, such as [The Andy Warhol Museum](#), [Pursuit](#), [Oasis](#), [LISC Greater Newark](#), [YMCA of Pawtucket](#), and [Rhode Island Hospital Foundation](#). Read more on pages 36–37.

Appendix

GRI Index

GRI is an international organization that provides a framework for sustainability reporting. Citizens has reported the information cited in this GRI content index for the period January 1, 2023, to December 31, 2023, with reference to the GRI Standards. Some additional disclosures not related to material GRI topics have been included in this index, in cases where we have reported information in line with other relevant GRI standards. For additional financial performance disclosures, please refer to the company’s quarterly and annual reports and quarterly earnings materials, available on our [Investor Relations](#) website.

Standard/Disclosure	Link or Response
GRI 2: General Disclosures 2021	
2-1 Organizational details	About Citizens Financial Group , p. 6 Citizens website: Our Company
2-2 Entities included in the organization’s sustainability reporting	Unless otherwise specified, Citizens’ sustainability reporting includes all entities included in its consolidated financial statements. For more information, see our 2023 Form 10-K , p. 6.
2-3 Reporting period, frequency and contact point	About This Report , p. 6
2-4 Restatements of information	None
2-5 External assurance	About This Report , p. 6
2-6 Activities, value chain, and other business relationships	About Citizens Financial Group , p. 6 2023 Form 10-K , pp. 6-7 Citizens website: Our Business
2-7 Employees	About Citizens Financial Group , p. 6 2023 Colleague and Hiring Data , p. 31
2-8 Workers who are not employees	Not applicable — Citizens does not rely on a significant number of contractors or other workers who are not employees.
2-9 Governance structure and composition	Board Governance , p. 14 Oversight of Environmental, Social, and Governance Matters , p. 10 2024 Proxy Statement , pp. 11-13, 16-24, 29-32 Citizens website: Corporate Governance
2-10 Nomination and selection of the highest governance body	Board Governance , p. 14 2024 Proxy Statement , pp. 25-28
2-11 Chair of the highest governance body	Board Governance , p. 14 2024 Proxy Statement , p. 30
2-12 Role of the highest governance body in overseeing the management of impacts	Oversight of Environmental, Social, and Governance Matters , p. 10 2024 Proxy Statement , p. 36 2023 CDP Response , pp. 2-3
2-13 Delegation of responsibility for managing impacts	Oversight of Environmental, Social, and Governance Matters , p. 10 2024 Proxy Statement , p. 36 2023 CDP Response , pp. 2-3

Standard/Disclosure	Link or Response
2-14 Role of the highest governance body in sustainability reporting	The Nominating and Corporate Governance Committee and the Audit Committee of the Board review and approve Citizens’ annual Environmental Social Governance Report and Climate Report prior to publication.
2-15 Conflicts of interest	Board Governance , p. 14 2024 Proxy Statement , pp. 24, 26, 29, 37-38 Corporate Governance Guidelines , p. 6
2-16 Communication of critical concerns	Oversight of Environmental, Social, and Governance Matters , p. 10 Cybersecurity , p. 19 2024 Proxy Statement , pp. 33-38 Information unavailable (partial) — Citizens does not currently disclose details on the number and nature of critical concerns communicated to the Board.
2-17 Collective knowledge of the highest governance body	Oversight of Environmental, Social, and Governance Matters , p. 10 2024 Proxy Statement , p. 41 2023 CDP Response , p. 3 Corporate Governance Guidelines , p. 7
2-18 Evaluation of the performance of the highest governance body	2024 Proxy Statement , p. 42 Corporate Governance Guidelines , p. 2
2-19 Remuneration policies	Executive Compensation , p. 15 2024 Proxy Statement , pp. 14-15, 43-44, 55-63
2-20 Process to determine remuneration	Executive Compensation , p. 15 2024 Proxy Statement , pp. 56-63
2-21 Annual total compensation ratio	2024 Proxy Statement , p. 86-87
2-22 Statement on sustainable development strategy	Message From Our Chairman and CEO , p. 4
2-23 Policy commitments	Corporate Governance Guidelines Code of Business Conduct and Ethics Supplier Code of Conduct Third Party Resource Code of Conduct and Ethics Citizens also maintains numerous internal policies related to responsible business conduct, including but not limited to human resource policies, legal and compliance policies, and privacy and security policies.
2-24 Embedding policy commitments	Board Governance , p. 14 Business Conduct and Ethics , p. 16 Supply Chain Management , p. 20
2-25 Processes to remediate negative impacts	We are strongly committed to conducting our business affairs with honesty and integrity and in full compliance with all applicable laws, rules, and regulations. As part of this commitment, we cooperate fully with efforts to investigate and remediate any relevant issues identified via applicable grievance mechanisms, including courts, consumer protection agencies, and regulatory oversight bodies.

Standard/Disclosure	Link or Response
2-26 Mechanisms for seeking advice and raising concerns	Reporting Ethics Concerns , p. 16 Code of Business Conduct and Ethics , p. 6
2-27 Compliance with laws and regulations	Instances of non-compliance with laws and regulations would be disclosed in the 2022 Form 10-K if they met the SEC’s threshold for inclusion in financial filings. There were no instances of non-compliance with laws and regulations that required disclosure during the reporting period. For more information, see our 2022 Form 10-K , pp. 134-135.
2-28 Membership associations	Citizens is a member of a number of trade associations at both the national and regional levels. Our national memberships include the American Bankers Association, Bank Policy Institute, and Consumer Bankers Association, among others.
2-29 Approach to stakeholder engagement	Shareholder Engagement , p. 15 Stakeholder Engagement , p. 12 2024 Proxy Statement , pp. 39-41
2-30 Collective bargaining agreements	0% of Citizens colleagues are covered by collective bargaining agreements.
GRI 3: Material Topics 2021	
3-1 Process to determine material topics	Materiality Assessment , p. 11
3-2 List of material topics	Materiality Assessment , p. 11
3-3 Management of material topics	See material topic disclosures below.
GRI 201: Economic Performance 2016	
3-3 Management of material topics	2023 Form 10-K , pp. 6-9
201-1 Direct economic value generated and distributed	About Citizens Financial Group , p. 6 Fostering Strong Communities , p. 39 2023 Form 10-K , pp. 39-44
201-2 Financial implications and other risks and opportunities due to climate change	Understanding and Managing Climate-Related Risks , p. 24 2024 Climate Report , pp. 7-13 2023 CDP Response , pp. 4-11 Information unavailable (partial) — Citizens does not currently have adequate methods for calculating the potential financial implications of climate change. We will continue in our efforts to identify and implement such methods in the future, in line with evolving industry practices, and to expand our disclosures as appropriate.
201-3 Defined benefit plan obligations and other retirement plans	2023 Form 10-K , pp. 129-131
GRI 203: Indirect Economic Impacts 2016	
3-3 Management of material topics	Fostering Strong Communities , p. 39
203-1 Infrastructure investments and services supported	Community Development Financing , p. 40
203-2 Significant indirect economic impacts	Fostering Strong Communities , p. 39

Standard/Disclosure	Link or Response
GRI 205: Anti-Corruption 2016	
3-3 Management of material topics	Business Conduct and Ethics , p. 16 Enterprise Risk Management , p. 17 2023 Form 10-K , p. 19 Code of Business Conduct and Ethics , pp. 13-16, 19 Supplier Code of Conduct
205-1 Operations assessed for risks related to corruption	Not applicable — Citizens assesses risks related to corruption on a companywide basis, rather than for specific operational locations.
205-2 Communication and training about anti-corruption policies and procedures	Business Conduct and Ethics , p. 16 2023 Form 10-K , p. 19 All Citizens colleagues are required to complete annual training on the Code of Business Conduct and Ethics, which includes content on anti-corruption.
205-3 Confirmed incidents of corruption and actions taken	Confirmed incidents of corruption would be disclosed in the 2023 Form 10-K if they met the SEC’s threshold for inclusion in financial filings. Citizens experienced no confirmed incidents of corruption during the reporting period.
GRI 206: Anti-Competitive Behavior 2016	
3-3 Management of material topics	Business Conduct and Ethics , p. 16 Code of Business Conduct and Ethics , p. 19
206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Legal actions for anti-competitive behavior, anti-trust, or monopoly practices would be disclosed in the 2023 Form 10-K if they met the SEC’s threshold for inclusion in financial filings. There were no such legal actions that required disclosure during the reporting period. For more information, see our 2023 Form 10-K , p. 135.
GRI 305: Emissions 2016	
3-3 Management of material topics	Reducing Our Operational Emissions , p. 25 2024 Climate Report , p. 13 2023 CDP Response , pp. 4-14
305-1 Direct (Scope 1) GHG emissions	Reducing Our Operational Emissions , p. 25 2024 Climate Report , p. 16 2023 CDP Response , pp. 21-22
305-2 Energy indirect (Scope 2) GHG emissions	Reducing Our Operational Emissions , p. 25 2024 Climate Report , p. 16 2023 CDP Response , pp. 21-22
305-3 Other indirect (Scope 3) GHG emissions	2024 Climate Report , p. 16 2023 CDP Response , pp. 22-25
305-4 GHG emissions intensity	2023 CDP Response , p. 25
305-5 Reduction of GHG emissions	2023 CDP Response , pp. 16, 18, 21-23
305-6 Emissions of ozone-depleting substances (ODS)	Information unavailable — Citizens does not currently disclose non-GHG emissions.
305-7 Nitrogen oxides (NO _x), sulfur oxides (SO _x), and other significant air emissions	Information unavailable — Citizens does not currently disclose non-GHG emissions.

Standard/Disclosure	Link or Response
GRI 401: Employment 2016	
3-3 Management of material topics	Talent Attraction, Development, and Engagement , p. 33
401-1 New employee hires and employee turnover	Talent Attraction, Development, and Engagement , p. 33 Information unavailable (partial) — Citizens does not currently disclose the total number and rate of employee turnover.
401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Keeping Our Colleagues Healthy , p. 36 Citizens Careers: Benefits
401-3 Parental leave	Keeping Our Colleagues Healthy , p. 36 Information unavailable (partial) — Citizens does not currently disclose information on the number of employees using our Parental Leave Policy.
GRI 404: Training and Education 2016	
3-3 Management of material topics	Talent Attraction, Development, and Engagement , p. 33
404-1 Average hours of training per year per employee	Growth and Career Development , p. 34 Information unavailable (partial) — Citizens does not currently disclose the average hours of training per year per employee by gender and employee category.
404-2 Programs for upgrading employee skills and transition assistance programs	Growth and Career Development , p. 34 Information unavailable (partial) — Citizens does not currently provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment.
404-3 Percentage of employees receiving regular performance and career development reviews	Growth and Career Development , p. 34 95% of colleagues receive annual performance reviews via our Performance Enablement (PE) framework.
GRI 405: Diversity and Equal Opportunity 2016	
3-3 Management of material topics	Creating an Inclusive Environment , p. 28
405-1 Diversity of governance bodies and employees	Creating an Inclusive Environment , p. 28 2024 Proxy Statement , p. 12 2023 Form 10-K , pp. 9-10
405-2 Ratio of basic salary and remuneration of women to men	Pay Equity , p. 32
GRI 413: Local Communities 2016	
3-3 Management of material topics	Fostering Strong Communities , p. 39
413-1 Operations with local community engagement, impact assessments, and development programs	Information unavailable (partial) — Citizens does not currently track the percentage of operations with local engagement, impact assessments, and/or development programs.
413-2 Operations with significant actual and potential negative impacts on local communities	Information unavailable (partial) — Citizens does not currently assess the significant actual and potential negative impacts of our operations on local communities.

Standard/Disclosure	Link or Response
GRI 417: Marketing and Labeling 2016	
3-3 Management of material topics	Fair and Responsible Banking , p. 42
417-1 Requirements for product and service information and labeling	Fair and Responsible Banking , p. 42
417-2 Incidents of non-compliance concerning product and service information and labeling	Incidents of non-compliance concerning product and service information and labeling would be disclosed in the 2023 Form 10-K if they met the SEC’s threshold for inclusion in financial filings. There were no instances of non-compliance concerning product and service information and labeling that required disclosure during the reporting period. For more information, see our 2023 Form 10-K , p. 135.
417-3 Incidents of non-compliance concerning marketing communications	Incidents of non-compliance concerning marketing communications would be disclosed in the 2023 Form 10-K if they met the SEC’s threshold for inclusion in financial filings. There were no instances of non-compliance concerning marketing communications that required disclosure during the reporting period. For more information, see our 2023 Form 10-K , p. 135.
GRI 418: Customer Privacy 2016	
3-3 Management of material topics	Privacy and Personal Information Protection , p. 18 Cybersecurity , p. 19 2023 Form 10-K , pp. 17-18 Citizens: Privacy Policy
418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	2023 Form 10-K , pp. 27 There were no substantiated complaints received during the reporting period.

SASB Index

The Sustainability Accounting Standards Board (SASB) Standards identify the disclosure topics and metrics that are most likely to be useful to investors based on a company’s sector. This report has been prepared in alignment with the SASB Commercial Banks sector standard.

For several SASB metrics, information is not disclosed because that information is considered confidential or material, or we do not track information in a manner that corresponds to the SASB metric. Unless otherwise specified, all disclosed information applies to the entire company for the fiscal year ended December 31, 2023.

Please refer to the company’s quarterly and annual reports and quarterly earnings materials for additional financial performance disclosures.


SASB Commercial Banks Standard, Version 2023-12

SASB Code	Accounting or Activity Metric	Link or Response
Data Security		
FN-CB-230a.1	(1) Number of data breaches, (2) percentage that are personal data breaches, (3) number of account holders affected	Data breaches would be disclosed in the 2022 Form 10-K if they met the SEC’s threshold for inclusion in financial filings. There were no data breaches that required disclosure during the reporting period.
FN-CB-230a.2	Description of approach to identifying and addressing data security risks	Cybersecurity , p. 19 2023 Form 10-K , pp. 17-18 2024 Proxy Statement , p. 35
Financial Inclusion & Capacity Building		
FN-CB-240a.1	(1) Number and (2) amount of loans outstanding qualified to programs designed to promote small business and community development	Community Development Financing , p. 40
FN-CB-240a.2	(1) Number and (2) amount of past due and nonaccrual loans or loans subject to forbearance that qualify for programs designed to promote small business and community development	Citizens does not track this in a way that is fully correlative with this disclosure metric. We report related information under Community Development Financing , p. 40.
FN-CB-240a.3	Number of no-cost retail checking accounts provided to previously unbanked or underbanked customers	Citizens does not track this in a way that is fully correlative with this disclosure metric. We report related information under Community Development Financing , p. 40.
FN-CB-240a.4	Number of participants in financial literacy initiatives for unbanked, underbanked, or underserved customers	Citizens does not track this in a way that is fully correlative with this disclosure metric. We report related information under Delivering Financial Empowerment Programs , p. 43.
Incorporation of Environmental, Social, and Governance Factors in Credit Analysis		
FN-CB-410a.2	Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis	Our Commercial Credit Policy includes compliance with environmental laws and regulations as a factor in evaluating the creditworthiness of a client.

SASB Code	Accounting or Activity Metric	Link or Response
Financed Emissions		
FN-CB-410b.1	Absolute gross financed emissions, disaggregated by (1) Scope 1, (2) Scope 2 and (3) Scope 3	We have not yet finalized our methodology for estimating financed emissions but are continuing to take steps to do so with the intention of reporting this information in the future. For more information, see Financed Emissions , p. 24.
FN-CB-410b.2	Gross exposure for each industry by asset class	Information not reported. See above.
FN-CB-410b.3	Percentage of gross exposure included in the financed emissions calculation	Information not reported. See above.
FN-CB-410b.4	Description of the methodology used to calculate financed emissions	Information not reported. See above.
Business Ethics		
FN-CB-510a.1	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, antitrust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations	Losses as a result of legal proceedings associated with any of these topics would be disclosed in the 2022 Form 10-K if they met the SEC’s threshold for inclusion in financial filings. There were no such losses that required disclosure during the reporting period. For more information, see our 2022 Form 10-K , p. 135.
FN-CB-510a.2	Description of whistleblower policies and procedures	Reporting Ethics Concerns , p. 16 Code of Business Conduct and Ethics , p. 6
Systemic Risk Management		
FN-CB-550a.1	Global Systemically Important Bank (G-SIB) score, by category	According to the Basel Committee on Banking Supervision's assessment methodology, Citizens is not considered to be a G-SIB and therefore does not have a G-SIB score.
FN-CB-550a.2	Description of approach to incorporation of results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy, and other business activities	2023 Form 10-K , pp. 11-14
Activity Metrics		
FN-CB-000.A	(1) Number and (2) value of checking and savings accounts by segment: (a) personal and (b) small business	(a) Personal (1) Approximately 6 million checking, savings, money market, and CD accounts (2) Approximately \$116 billion total value of accounts (b) Small business Not disclosed
FN-CB-000.B	(1) Number and (2) value of loans by segment: (a) personal, (b) small business, and (c) corporate	Citizens does not publicly disclose total numbers of loans by segment. In addition, our reportable segments do not align directly with those specified by SASB. However, relevant values may be found at the references below. (a) Personal 2023 Form 10-K , p. 46 (b) Small business Supporting Small Business and Diverse Supplier Growth , p. 41 (c) Corporate 2023 Form 10-K , p. 46

Notes

ⁱ Banking products and services are offered by Citizens Bank, N.A. For Deposit products, Member FDIC.

ⁱⁱ Mortgages and Home Equity Line of Credit are offered and originated by Citizens Bank, N.A. All loans subject to approval. NMLS ID# 433960.  Equal Housing Lender.

ⁱⁱⁱ Citizens Peace of Mind® provides additional time to bring your account to a positive available balance and reverse overdraft fees. If your account is overdrawn, you have up until 10:00 PM ET the following business day (e.g., if your account is overdrawn at the end of the day Monday, you have until 10:00 PM ET Tuesday) to deposit enough funds to cover all of the overdraft items (minus the fees) and any additional transactions that post to the account that day. If the available balance, excluding the overdraft fees, is positive (greater than or equal to \$0) at the end of the following business day, any overdraft fees will be reversed. When determining the amount you need to deposit to take advantage of Citizens Peace of Mind, you can check your balance in the Citizens mobile app or Online Banking and then consider transactions that may post to your account that day — such as checks or other debits. As we do not see these transactions until they are presented for payments, only you know what transactions may post to your account and how much you need to deposit. A deposit that only partially covers transactions or overdraft items will not result in a fee reversal. All deposits are subject to our Funds Availability schedule. This schedule helps you determine when a deposit you make will increase your available balance. For example, some deposit types, such as checks drawn on a bank other than Citizens, even if made by 10:00 PM ET the next business day, are not available to cover transactions that day. But a deposit of cash, a Citizens check, or an electronic funds transfer will generally be available to cover the transactions. For information on our Funds Availability Policy, please visit citizensbank.com/overdraft or see your Personal Deposit Account Agreement.

Citizens Peace of Mind is available on personal checking accounts and does not apply to Overdraft Line of Credit Transfer Fees.

^{iv} IMPORTANT DETAILS ON OVERDRAFT COVERAGE: When we pay a transaction that overdraws your account, we will charge you an overdraft fee of \$35 per item paid. When we return a check or ACH transaction unpaid because your account had insufficient funds, we will not charge you a fee. We will limit to five the number of overdraft fees charged on any one business day, up to a total of \$175. Once you have overdrawn your account, you must bring it to a positive balance as soon as possible. Whether your overdrafts will be paid is discretionary and we reserve the right not to pay. For example, we typically do not pay overdrafts if your account is not in good standing or if the overdraft amount is excessive.



About Citizens Financial Group

Citizens Financial Group, Inc. is one of the nation's oldest and largest financial institutions, with \$222 billion in assets as of December 31, 2023. Headquartered in Providence, Rhode Island, Citizens offers a broad range of retail and commercial banking products and services to individuals, small businesses, middle-market companies, large corporations, and institutions. Citizens helps its customers reach their potential by listening to them and by understanding their needs in order to offer tailored advice, ideas, and solutions.

In Consumer Banking, Citizens provides an integrated experience that includes mobile and online banking, a full-service customer contact center, and the convenience of approximately 3,200 ATMs and more than 1,100 branches in 14 states and the District of Columbia. Consumer Banking products and services include a full range of banking, lending, savings, wealth management, and small business offerings.

In Commercial Banking, Citizens offers a broad complement of financial products and solutions, including lending and leasing, deposit and treasury management services, foreign exchange, and interest rate and commodity risk management solutions, as well as loan syndication, corporate finance, merger and acquisition, and debt and equity capital markets capabilities.

More information is available at citizensbank.com, or visit us on [LinkedIn](#), [Facebook](#), or [X](#).

Cautionary Statement About Forward-Looking Statements

This document contains forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995. Any statement that does not describe historical or current facts is a forward-looking statement. These statements often include the words "believes," "expects," "anticipates," "estimates," "intends," "plans," "goals," "targets," "initiatives," "potentially," "probably," "projects," "outlook," "hopeful," "guidance" or similar expressions or future conditional verbs such as "may," "will," "should," "would," and "could."