Important COVID-19-related changes that extend benefit deadlines and allow for mid-year benefit changes

On May 4, 2020, the U.S. Departments of Labor and the Treasury (the Agencies) issue guidance that temporarily extends the deadlines in place for certain benefit changes and processes associated with election, notification, payment and claims/appeals in connection with the Coronavirus disease of 2019, which was deemed a national emergency on March 1, 2020 (the National Emergency). To protect individuals from losing benefit, the Agencies extended deadlines that might have been missed during the National Emergency. The temporary extension of the deadlines was initially set to expire 60 days after the end of the National Emergency. The Agencies have revised their guidance to provide that your extended deadline will end on the earlier of: (i) one year from your original deadline or (ii) your original time limit after the end of the National Emergency.

Deadline extensions

If you or your dependent(s) are experiencing one of the following situations, the deadlines will be recalculated, as defined above.

Do you need to	Temporary Extensions to Deadlines	Actions Needed
Change your coverage due to a life change? (e.g. loss of health coverage, qualified for Medicaid or Children's Health Insurance Program (CHIP), gained a dependent through marriage, birth or adoption, or other qualified life event).	You have 31 days from the date of your life change to make changes to your coverage. If your 31-day notification period falls within the National Emergency, your extended deadline will be the earlier of one year from your original deadline or 31 days after the National Emergency to make coverage changes. For life changes tied to financial assistance or loss of coverage under the Children's Health Insurance Program (CHIP) or Medicaid, the timing is based on the earlier of one year from your original deadline or a 60-day notification period after the end of the National Emergency.	Visit Your Benefits Resources (YBR) available through My Total Compensation and Benefits at www.totalcomponline.com to complete enrollment. Or, call the Citi Benefits Center via ConnectOne at 1-800-881-3938 for additional help. From the `Benefits' menu, select the appropriate option.
Complete notification for a COBRA ¹ qualifying event? (e.g. divorce or legal separation, change in child dependent eligibility [age limit reached], disability determination or change in disability status, or qualifying for Medicare)	If your 60-day notification deadline falls within the defined National Emergency above, your extended deadline will be the earlier of one year from your original deadline or 60 days after the National Emergency to notify the plan.	Visit Your Benefits Resources (YBR) available through My Total Compensation and Benefits at www.totalcomponline.com to complete enrollment. Or, call the Citi Benefits Center via ConnectOne at 1-800-881-3938 for additional help. From the `Benefits' menu, select the appropriate option.

¹ Consolidated Omnibus Budget Reconciliation Act of 1985

Do you need to	Temporary Extensions to Deadlines	Actions Needed
Enroll in COBRA coverage?	If you become eligible for COBRA, you have a 60-day initial enrollment period. If your 60-day enrollment deadline falls within the defined National Emergency above, your extended deadline will be the earlier of one year from your original deadline or 60 days after the National Emergency) to enroll in COBRA.	Call the Citi Benefits Center via ConnectOne at 1-800-881-3938 for additional help. From the `Benefits' menu, select the appropriate option.
Call to reinstate COBRA coverage?	If you received notification that COBRA coverage has been deactivated for nonpayment because you missed your original premium payment deadline, you may have additional time to make payment for this coverage and reinstate your COBRA coverage retroactively.	If you would like your COBRA coverage reinstated and are within the timeframes mentioned above, contact the Citi Benefits Center via ConnectOne at 1-800-881-3938 for additional help. From the `Benefits' menu, select the appropriate option.
Pay COBRA premiums?	If enrolled in COBRA, you have 60 days to submit payment for your initial bill and 60 days to submit payment for subsequent bills. However, for payment deadlines that fall within the defined National Emergency, you may have up to the earlier of one year from your original deadline or additional 60 days past the end of the National Emergency to submit a payment.	Payments should be sent to: CITI P.O. BOX 1118 CAROL STREAM IL 60132-1118 To sign up for direct debit, access Your Benefits Resources available through My Total Compensation and Benefits at <u>www.totalcomponline.com</u> .
	If the full amount is not submitted by the extended deadline, coverage will end as of the last day for which you have made payment.	Please note: While an extended grace period will be allowed, the amount owed for applicable months of coverage will remain the same. If this full amount is not submitted by the extended deadline, coverage will be terminated retroactively to the last day of the month for which you have made payment. E.g., your COBRA begins on May 1, 2021 and you have until the extended deadline to pay.
		 If you don't make any payments by the extended deadline, your coverage will be terminated retroactive to April 30, 2021. If you pay for May and June only by the extended deadline, your coverage will be terminated retroactive to your latest paid through date, June 30, 2021.

Do you need to	Temporary Extensions to Deadlines	Actions Needed
File a claim or appeal (for any plan or program subject to ERISA ² ; e.g., eligibility claims/appeals for group health plans, disability and other employee welfare plans, and pension benefit plans)	If your deadline to submit a claim/appeal falls within the defined National Emergency, you may have additional time to submit your claim/appeal, as the deadline will be recalculated, to extend through the National Emergency.	Visit Your Benefits Resources (YBR) available through My Total Compensation and Benefits at <u>www.totalcomponline.com</u> for more details. Or, call the Citi Benefits Center via ConnectOne at 1-800-881-3938 for additional help. From the `Benefits' menu, select the appropriate option.

Summary of 2021 COVID Relief Measures Available to Citi Employees

On December 27, 2020, the Consolidated Appropriations Act 2021 was signed into law, providing additional COVID-19 relief measures and extensions for certain spending and reimbursement accounts. The following summary provides an overview of the additional relief available to eligible Citi employees.

Health Care Spending Account (HCSA)/ Limited Purposed Spending Account (LPSA) and Dependent Day Care Spending Account (DCSA) Carryover2020 carryover to 2021: Services must be incurred between 1/1/2021 to 12/31/2021; these claims must be submitted by June 30, 2022.For the following example, let's assume:If you were actively employed and benefits-eligible as of 12/31/2020, you'll be allowed to carryover all unused contributions from your 2020 plan year (up to the 2020 maximum election amount) into 2021 to use for eligible 2021 expenses. You'll also be able to carryover all unused contributions from your 2021 spending account (up to the 2021 maximum election amount) to use for eligible 2022 expenses.2020 carryover to 2021: Services must be incurred between 1/1/2022 to 12/31/2022; these claims must be submitted by June 30, 2023. Follow your existing process to submit claims.For the following example, let's assume:No action is needed. Any unused money from the 2020 plan year will be available for 2021 expenses as of April 1, 2021.2020 carryover to 2021: Services must be incurred between 1/1/2022 to 12/31/2022; these claims must be submitted by June 30, 2023. Follow your existing process to submit claims.For the following example, let's assume:No action is needed. Any unused money from the 2020 plan year will be available for 2021 expenses as of April 1, 2021.2020 carryover to 2021; Services must be incurred between 1/1/2022 to 12/31/2022; these claims must be submitted by June 30, 2023. Follow your existing process to submit claims.For the following example, let's assume: For the 2021 plan year, you uelected to contribute \$5,000 to your DCSA will be rolled over into the 2021 plan year DCS	Update	Claim Deadlines	Example
	(HCSA)/ Limited Purposed Spending Account (LPSA) and Dependent Day Care Spending Account (DCSA) Carryover If you were actively employed and benefits-eligible as of 12/31/2020, you'll be allowed to carryover all unused contributions from your 2020 plan year (up to the 2020 maximum election amount) into 2021 to use for eligible 2021 expenses. You'll also be able to carryover all unused contributions from your 2021 spending account (up to the 2021 maximum election amount) to use for eligible 2022 expenses. No action is needed. Any unused money from the 2020 plan year will be available for 2021 expenses as	must be incurred between 1/1/2021 to 12/31/2021; these claims must be submitted by June 30, 2022. 2021 carryover to 2022 : Services must be incurred between 1/1/2022 to 12/31/2022; these claims must be submitted by June 30, 2023. Follow your existing process to	 assume: For the 2020 plan year, you have an unused balance of \$1,000 in your DCSA on 12/31/2020. For the 2021 plan year, you elected to contribute \$5,000 to your DCSA. The unused balance of \$1,000 from your 2020 plan year DCSA will be rolled over into the 2021 plan year DCSA, resulting in a total benefit amount of \$6,000 in your DCSA for 2021.That balance as well as any DCSA contributions for the 2022 plan year can be used to reimburse

² Employee Retirement Income Security Act of 1974

Example

Dependent Day Care Spending Account (DCSA) Dependent Age Increase

Employees may now incur and submit DCSA expenses for reimbursement for a child up to his or her 14th birthday during the 2020 or 2021 plan year. This change only applies if you enrolled in DCSA coverage for the 2020 plan year during annual enrollment.

No action is needed for this provision to apply.

Allowable mid-year changes

In addition to extending deadlines, the Internal Revenue Service (IRS) has also published guidance for employers to allow plan participants to make mid-year election changes for 2021 health and dental coverage, as well as health care and dependent care flexible spending accounts.

Do you need to	Allowable Changes	Actions Needed
medical, dental, and/or vision coverage?coverageAdd spouse and/or any eligible dependent to your medical coverage	 Add spouse and/or any 	Visit Your Benefits Resources (YBR) available through My Total Compensation and Benefits at <u>www.totalcomponline.com</u> to complete enrollment. Or, call the Citi Benefits Center via ConnectOne
	Note: You are not permitted to cancel your medical, dental, or vision coverage.	at 1-800-881-3938 for additional help. From the 'Benefits' menu, select the appropriate option.
Make Changes to your Spending Account Elections?	 Increase/Start spending account contributions until October 31, 2021 	Visit Your Benefits Resources (YBR) available through My Total Compensation and Benefits at <u>www.totalcomponline.com</u> to complete enrollment. Or, call the Citi Benefits Center via ConnectOne at 1-800-881-3938 for additional help. From the `Benefits' menu, select the appropriate option.
(Health Care Spending Account (HCSA), Limited Purpose Health Care Spending Account (LPSA), or Dependent Day Care Spending Account (DCSA)).	• Decrease/drop spending account contributions until October 31, 2021	

At Citi, this means you have a mid-year opportunity to adjust your current 2021 benefits coverage prospectively under the plans above without needing to experience a qualifying change in status.

Citi will offer an opportunity for you to enroll or make changes to your 2021 coverage (limited to plans above) up until December 31, 2021 for any medical, dental, and vision changes. The deadline for any changes to spending account enrollment for 2021 is October 31, 2021.

Need help?

For more information about deadline extensions or allowable mid-year changes, contact the Citi Benefits Center via ConnectOne at 1-800-881-3938 for additional help. From the 'Benefits' menu, select the appropriate option.

For a representative, call from 8 a.m. to 8 p.m. Eastern time on weekdays, excluding holidays.

For expatriate staff employees and from outside the United States, Puerto Rico, and Canada, call 1-469-220-9600 to reach ConnectOne.

For text telephone services, call Telecommunications Relay Services at 711 (employees located in Puerto Rico should call 1-866-280-2050), then call 1-800-881-3938 and follow the instructions to enter ConnectOne above.