

California's Voluntary Carbon Market Disclosures Business Regulation Act (AB 1305) ("VCMDA")

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AB 1305 44475 Disclosure Requirement

Citizens' Carbon Offset Deposit Account allows our commercial clients to incorporate their sustainability goals into their banking strategies. With credit earned on deposit balances quality carbon offsets are purchased and retired on the client's behalf. The VCMDA disclosures for the 2025 project portfolio can be found below. Project information was obtained from the project registry and third-party verification documents.

Project #1	Heartland Methane Abatement and Land Restoration - Packard & Kottke Ranch Project	VCMDA Section
Registry	American Carbon Registry (ACR)	
Registry ID	ACR890	
Vintage	2023	
Registry Project URL	https://acr2.apx.com/mymodule/reg/prjView.asp?id1=890	
Project Data URL	https://acr2.apx.com/mymodule/reg/TabDocuments.asp?r=111&ad=Prpt&act=update&type=PRO&aProj=pub&tablename=doc&id1=890	(c)
Protocol	ACR - Methodology for the Quantification, Monitoring, Reporting and Verification of Greenhouse Gas Emissions Reductions and Removals from the Plugging of Orphaned Oil And Gas Wells in the US and Canada Version 1.0 (May 2023)	(a1)
Location	Washington County, OK, USA	(a2)
Project Start/End	6/6/2023 - 6/5/2043	(a3) (a4)
Project Issuance	2023 Vintage: 80,782 mT issued	(a5) (a10)
Project Type	Avoidance - Industrial Process Emissions	(a6)
Other Standards Met	unknown	(a7)
Durability	Permanent, emissions sequestered	(a8)
Third Party Verifier	GHD Services Inc (GHD)	(a9)
Accountability Measures	ACR protocol, transparent public registry, third-party verification, additionality testing	(b)

Project #2	IESI-Trinity Timber Ridge Landfill Carbon Project	VCMDA Section
Registry	Climate Action Reserve (CAR)	
Registry ID	CAR838	
Vintage	2023	
Registry Project URL	https://thereserve2.apx.com/mymodule/reg/prjView.asp?id1=838	
Project Data URL	https://thereserve2.apx.com/mymodule/reg/TabDocuments.asp?r=111&ad=Prpt&act=update&type=PRO&aProj=pub&tablename=doc&id1=838	(c)
Protocol	Climate Action Reserve (CAR) Landfill Project Protocol v6.0 (June 2022)	(a1)
Location	Timber Ridge Landfill, Richwoods, MO USA	(a2)
Project Start/End	3/1/2011 - 2/28/31	(a3) (a4)
Project Issuance	2023 Vintage 3/1/23 - 12/31/23: 63,922 mT issued	(a5) (a10)
Project Type	Landfill Gas Capture/Combustion - avoided emissions	(a6)
Other Standards Met	Core Carbon Principle labelled credits	(a7)
Durability	Permanent, emissions destructured	(a8)
Third Party Verifier	First Environment - Reporting Period 3/1/23 - 2/29/24	(a9)
Accountability Measures	Avoided emissions have already occurred and cannot be reversed, CAR protocol, transparent public registry, third-party verification, additionality testing, annual verification of credits	(b)

Project #3	Advanced Refrigeration - ARS2021004	VCMDA Section
Registry	American Carbon Registry (ACR)	
Registry ID	ACR904	
Vintage	2021	
Registry Project URL	https://acr2.apx.com/mymodule/reg/prjView.asp?id1=904	
Project Data URL	https://acr2.apx.com/mymodule/reg/TabDocuments.asp?r=111&ad=Prpt&act=update&type=PRO&aP roj=pub&tablename=doc&id1=904	(c)
Protocol	ACR - Methodology for the Quantification, Monitoring, Reporting and Verification of Greenhouse Gas Emissions Reductions and Removals from Advanced Refrigeration Systems 2.1 (August 2021); ACR Standard 8.0 (July 2023)	(a1)
Location	multiple US locations (AL, FL, GA, SC, TN)	(a2)
Project Start/End	5/5/2021 - 5/4/2031	(a3) (a4)
Project Issuance	2021 Vintage: 164,129 mT issued	(a5) (a10)
Project Type	Avoidance - Industrial Process Emissions	(a6)
Other Standards Met	unknown	(a7)
Durability	Permanent, emissions avoided	(a8)
Third Party Verifier	First Environment	(a9)
Accountability Measures	ACR protocol, transparent public registry, third-party verification, additionality testing	(b)

Project #4	Advanced Refrigeration - ARS2020001	VCMDA Section
Registry	American Carbon Registry (ACR)	
Registry ID	ACR747	
Vintage	2020	
Registry Project URL	https://acr2.apx.com/mymodule/reg/prjView.asp?id1=747	
Project Data URL	https://acr2.apx.com/mymodule/reg/TabDocuments.asp?r=111&ad=Prpt&act=update&type=PRO&aP roj=pub&tablename=doc&id1=747	(c)
Protocol	ACR - Methodology for the Quantification, Monitoring, Reporting and Verification of Greenhouse Gas Emissions Reductions and Removals from Advanced Refrigeration Systems 2.1 (August 2021); ACR Standard 7.0 (Dec 2020)	(a1)
Location	multiple US locations (NY)	(a2)
Project Start/End	10/4/2020 - 10/3/2030	(a3) (a4)
Project Issuance	2020 Vintage: 32,742 issued	(a5) (a10)
Project Type	Avoidance - Industrial Process Emissions	(a6)
Other Standards Met	unknown	(a7)
Durability	Permanent, emissions avoided	(a8)
Third Party Verifier	First Environment	(a9)
Accountability Measures	ACR protocol, transparent public registry, third-party verification, additionality testing	(b)

AB 1305 44475.1 Disclosure Requirement

Citizens currently does not purchase or use voluntary carbon offsets when making claims regarding carbon neutrality.

AB 1305 44475.2(a) Disclosure Requirement

Citizens retained Stantec Consulting Ltd. (“Stantec”), an independent third-party international professional services company, to perform limited verification on its emissions data. Stantec is a top-tier global design firm that offers engineering, architecture, energy, water, and project management services for various sectors and projects. Stantec verified that Citizens emissions reporting complies with *ISO 14064-3: 2019 Greenhouse Gases - Part 3* standards. Stantec also verified that Citizens’ emissions reporting complies with the *GHG Protocol Scope 2 Guidance, 2015*.

Stantec verified the following information regarding carbon emissions on which Citizens makes a reduction claim:

- Energy use information for all fuel sources that comprise the Scope 1 and Scope 2 emission categories. Scope 1 direct emissions include: stationary fuel combustion of fuel oil, natural gas, propane, and diesel; mobile fuel combustion of diesel, gasoline, and jet fuel; and fugitive refrigerant emissions. Scope 2 emissions include

indirect emissions associated with the purchase of electric power, market and location based.

Verified energy use information comes directly from Citizens facilities, owned fleet vehicles, and the owned corporate jet. For facility energy use, Citizens relies on actual utility bills that are gathered by a third-party vendor that assists with the activity data management, quality assurance and control, and the completion of the GHG and energy calculations. Stantec is responsible for planning and executing the verification to deliver a limited level of assurance opinion as to whether the GHG and Energy Use Assertions were presented fairly and in accordance with the verification criteria. Fuel data from Citizens owned fleet vehicles and owned corporate jet is provided by the associated vendors to Stantec. Citizens publishes market and location-based emissions calculations, and Stantec verifies both approaches. Citizens can then measure year-over-year reductions in Scope 1 and Scope 2 emissions, which form the basis of its public performance goals. Citizens publishes actual emissions in metric tons of carbon dioxide equivalent (commonly expressed as MT CO₂e).

Performance goals are calculated directly from Stantec-verified emissions data. As a result, Citizens calculates its Scope 1 and Scope 2 performance goals, usually expressed as a percentage increase or decrease in emissions from the prior year, without reliance on Stantec. Citizens may publish ‘actual’ and ‘legacy-only’ emissions data to account for significant events, such as a merger or acquisition.

Citizens continues to make progress on its sustainability efforts. As part of a 2023 Sustainability Announcement, Citizens committed to achieving operational carbon neutrality for Scope 1 and 2 emissions by 2035. To meet that goal, the bank will continue ongoing efforts to reduce direct and indirect GHG emissions and address any remaining emissions through the purchase and retirement of high-quality carbon offsets. In 2024, Citizens matched 100% of the bank’s electricity consumption using RECs generated through a VPPA, supporting construction of the Sunflower Wind Farm in Marion County, Kansas.

Citizens’ approach to climate reporting, like its strategy, is focused on the areas that are most critical to business success and that align with the interests and expectations of stakeholders. Citizens’ most recent Sustainability & Impact and Climate Reports can be found on the company’s website: [CRA Public File, Reports & Disclosures](#).

AB 1305 44475.2(b) Disclosure Requirement

Citizens retained Stantec Consulting Ltd. (“Stantec”), an independent third-party international professional services company, to perform limited verification on its emissions data.

Citizens Scope 1 and Scope 2 emissions are not validated as being “science-based” by a third party.