



## AML ATF Questionnaire 2024

The contents noted herein pertain to the CIBC Caribbean Bank Limited Group of Companies, Subsidiaries and Branches.

### SECTION 1 – GENERAL ADMINISTRATIVE INFORMATION

1. **Legal and Trading Name:** CIBC Caribbean Bank Limited
2. **Date Established:** October 11, 2002
3. **Street Address:** Warrens, St. Michael, Barbados
4. **Website Address:** [www.cibcfib.com](http://www.cibcfib.com)
5. **Name of Parent Company:** Canadian Imperial Bank of Commerce (CIBC)
6. **Address of Parent Company:** Commerce Court, Toronto, Ontario, M5L 1A2 Canada
7. **Name of Parent Company Stock Exchange and Symbol:** Toronto Stock Exchange (TSE) – Symbol CM
8. **Operating Companies:**

CIBC Caribbean Bank Limited operates eight (8) wholly or majority owned entities as follows:

- i. **CIBC Caribbean Bank (Barbados) Limited (Wholly owned)**  
Address: Michael Mansoor Building, Warrens, St. Michael, Barbados  
Locations: Antigua and Barbuda; Barbados; St. Kitts and Nevis; St. Lucia  
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- ii. **CIBC Caribbean Bank (Bahamas) Limited (95.21% shareholding)**  
Address: Shirley Street, Nassau, The Bahamas  
Locations: The Bahamas; Turks and Caicos Islands
- iii. **CIBC Caribbean Bank (Cayman) Limited (Wholly owned)**  
Address: 25 Main St., George Town, Grand Cayman, Cayman Islands  
Locations: British Virgin Islands, Cayman Islands, St. Maarten
- iv. **CIBC Caribbean Bank (Jamaica) Limited (Wholly owned)**  
Address: 23-27 Knutsford Boulevard, Kingston, Jamaica  
Location: Jamaica
- v. **CIBC Caribbean Wealth Management Bank (Barbados) Limited (Wholly owned)**  
Address: Michael Mansoor Building, Warrens, St. Michael, Barbados  
Location: Barbados
- vi. **CIBC Caribbean Bank (Trinidad and Tobago) Limited (Wholly owned)**  
Address: 74 Long Circular Road, Maraval, Port of Spain, Trinidad and Tobago  
Location: Trinidad and Tobago
- vii. **CIBC Caribbean Trust Company (Bahamas) Limited (Wholly owned)**  
Address: Goodman's Bay Corporate Centre, West Bay Street, Nassau, The Bahamas  
Location: The Bahamas
- viii. **CIBC Caribbean Bank and Trust Company (Cayman) Limited (Wholly owned)**  
Address: 25 Main Street, George Town, Grand Cayman, Cayman Islands  
Location: Cayman Islands



9. **Type of Business and Activity:** Financial Services including but not limited to: Retail, Corporate Banking, Capital Markets and Wealth Management

10. **Is the Financial Institution Publicly Traded? YES** (If Yes, please state name of exchange and symbol)

CIBC Caribbean Bank Limited is itself publicly traded as well as one (1) of its operating companies, as follows:

- CIBC Caribbean Bank Limited – Symbol **FCI**
  - i. Barbados Stock Exchange
  - ii. Trinidad and Tobago Stock Exchange
- CIBC Caribbean Bank (Bahamas) Limited – Symbol **CIB**
  - i. Bahamas International Securities Exchange

11. **Regulatory Authority Information:**

The CIBC Caribbean Bank Limited Group of Companies is licensed and supervised by the following Regulatory Authorities:

- CIBC Caribbean Bank (Barbados) Limited regulatory authorities are:
  - i. Central Bank of Barbados
  - ii. Financial Services Commission (Barbados)
  - iii. Eastern Caribbean Central Bank
- CIBC Caribbean Bank (Bahamas) Limited regulatory authorities are:
  - i. Central Bank of The Bahamas
  - ii. The Securities Commission of The Bahamas
  - iii. Turks and Caicos Islands Financial Services Commission
- CIBC Caribbean Bank (Cayman) Limited regulatory authorities are:
  - i. Cayman Islands Monetary Authority
  - ii. Central Bank of Curacao and St. Maarten
  - iii. British Virgin Islands Financial Services Commission
- CIBC Caribbean Bank (Jamaica) Limited regulatory authorities are:
  - i. Bank of Jamaica
  - ii. Financial Services Commission of Jamaica
- CIBC Caribbean Wealth Management Bank (Barbados) Limited regulatory authority is:
  - i. Central Bank of Barbados
  - ii. Financial Services Commission (Barbados)



- CIBC Caribbean Bank (Trinidad and Tobago) Limited regulatory authorities are:
  - i. Central Bank of Trinidad and Tobago
  - ii. Trinidad and Tobago Securities and Exchange Commission
  
- CIBC Caribbean Trust Company (Bahamas) Limited regulatory authorities are:
  - i. Central Bank of The Bahamas
  - ii. The Securities Commission of The Bahamas
  
- CIBC Caribbean Bank and Trust Company (Cayman) Limited regulatory authority is:
  - i. Cayman Islands Monetary Authority

## SECTION 2 – ANTI-MONEY LAUNDERING/ANTI-TERRORIST FINANCING PROGRAM

| A. General AML/ATF Policies, Practices and Procedures   | YES              | NO   |
|---|------------------|--|
| 1. Does the Financial Institution's AML/ATF program require approval of the Board of Directors?   | ☒                | <input type="checkbox"/>   |
| 2. Does the Financial Institution's approved AML/ATF program include a designated Compliance Officer with oversight responsibility for coordinating the AML/ATF program on a daily basis?   | ☒                | <input type="checkbox"/>   |
| 3. Does the Financial Institution's approved AML/ATF program include written policies, documenting the processes to be followed in preventing, detecting and reporting suspicious activity?   | ☒                | <input type="checkbox"/>   |
| 4. Does the Financial Institution's approved AML/ATF program include an independent internal audit function that periodically tests the AML/ATF practices and policies on a regular basis?  | ☒                | <input type="checkbox"/>   |
| 5. Does the Financial Institution have a policy prohibiting accounts/relationships with shell banks? (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence, and which is unaffiliated with a regulated financial group)  | ☒                | <input type="checkbox"/>   |
| 6. Does the Financial Institution's approved AML/ATF program include policies covering relationships with politically exposed persons consistent with industry best practice?   | ☒                | <input type="checkbox"/>   |
| 7. Does the Financial Institution require that its AML/ATF policies be applied to all branches and subsidiaries of the Financial Institution both in the home country and in locations outside of the home country?   | ☒                | <input type="checkbox"/>   |
| 8. Does the Financial Institution have appropriate record retention procedures pursuant to applicable laws?   | ☒                | <input type="checkbox"/>   |
| <b>B. Risk Assessment</b>   |                  |  |
| 1. Does the Financial Institution determine the appropriate level of due diligence necessary for those categories of customers and transactions that the Financial Institution has reason to believe pose a heightened risk of illicit activities at or through the Financial Institution?  | ☒                | <input type="checkbox"/>   |
| <b>C. Know Your Customer Procedures</b>   |                  |  |
| i. Has the Financial Institution implemented systems for the identification of its customers using independent verifiable sources including: <ul style="list-style-type: none"> <li>a. Identification of beneficial ownership (including ownership and control structure where applicable)?</li> <li>b. Information regarding the purposes and nature of business relationship?</li> <li>c. On-going due diligence of the business relationship and scrutiny of transactions undertaken to ensure consistency with client profile?</li> <li>d. Procedures that establish a record for each customer noting their respective identification documents at account opening?</li> </ul> | ☒<br>☒<br>☒<br>☒ | <input type="checkbox"/><br><input type="checkbox"/><br><input type="checkbox"/><br><input type="checkbox"/> |
| ii. Does the Financial Institution have a policy that prohibits customers from maintaining anonymous accounts (i.e. numbered accounts for which the Financial Institution does not know the owner)?   | ☒                | <input type="checkbox"/>   |
| iii. Does the Financial Institution have a policy that specifies how transactions involving occasional customers should be handled?   | ☒                | <input type="checkbox"/>   |
| 4. Does the Financial Institution's Know Your Customer Policy include enhanced due diligence procedures for <ul style="list-style-type: none"> <li>a. Politically exposed persons?</li> <li>b. The handling of non-face-to-face business relationships?</li> <li>c. The use of intermediaries and other third-party sources of business?</li> </ul>   | ☒<br>☒<br>☒      | <input type="checkbox"/><br><input type="checkbox"/><br><input type="checkbox"/>                             |
| <b>D. Reportable Transactions</b>   |                  |  |
| 1. Does the Financial Institution have policies or practices for the identification and reporting of unusual/suspicious transactions?   | ☒                | <input type="checkbox"/>   |

| <b>E. Transaction Monitoring</b>   | <b>YES</b>   | <b>NO</b>  |
|--|--|--|
| 1. Does the Financial Institution have procedures to identify transactions that are structured to avoid large cash reporting requirements?   | <input checked="" type="checkbox"/>  | <input type="checkbox"/>   |
| 2. Does the Financial Institution monitor transactions against official lists of suspect terrorists and/or terrorist organizations and are confirmed matches reported to competent authorities?  | <input checked="" type="checkbox"/>  | <input type="checkbox"/>   |
| 3. Does the Financial Institution have a monitoring program for suspicious or unusual activity that covers funds transfers and monetary instruments (e.g. traveler's cheques, money orders, etc.)?   | <input checked="" type="checkbox"/>  | <input type="checkbox"/>   |
| 4. Does the Financial Institution require complete information for outgoing wire transfer instructions, including sender and beneficiary names, addresses, account numbers and purpose?  | <input checked="" type="checkbox"/>  | <input type="checkbox"/>   |
| <b>F. AML/ATF Training</b>   |  |  |
| 1. Does the Financial Institution provide AML/ATF training to staff on a regular basis that includes: <ul style="list-style-type: none"> <li>a. Know Your Customer Procedures?</li> <li>b. The means of identifying unusual/suspicious activity and internal procedures to report same?</li> <li>c. Examples of money laundering and terrorist financing?</li> <li>d. Internal procedures to detect and prevent money laundering and terrorist financing?</li> </ul> | <input checked="" type="checkbox"/><br><br><br><br><input checked="" type="checkbox"/><br><input checked="" type="checkbox"/><br><input checked="" type="checkbox"/> | <input type="checkbox"/><br><br><br><br><input type="checkbox"/><br><input type="checkbox"/><br><input type="checkbox"/> |
| 2. Does the Financial Institution maintain records of executed training including attendance records and training materials used?  | <input checked="" type="checkbox"/>  | <input type="checkbox"/>   |
| 3. Does the Financial Institution communicate new AML/ATF laws or regulations or changes to existing laws or regulations to relevant employees?  | <input checked="" type="checkbox"/>  | <input type="checkbox"/>   |

### SECTION 3 – COMPLIANCE CONTACT INFORMATION

The Chief AML & Compliance Officer (CCO) is Candice Huggins: email – [Candice.Huggins@cibcfib.com](mailto:Candice.Huggins@cibcfib.com)

The Director, AML & Sanctions Compliance is Annetta Francis: email – [Annetta.Francis@cibcfib.com](mailto:Annetta.Francis@cibcfib.com)

For further information regarding the contents of this AML/AFT questionnaire please contact our Compliance Helpdesk: email – [ComplianceHelpdesk@cibcfib.com](mailto:ComplianceHelpdesk@cibcfib.com)