

AML ATF Questionnaire 2019

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

SECTION 1 – GENERAL ADMINISTRATIVE INFORMATION

- Legal and Trading Name:
 FirstCaribbean International Bank Limited

 Date Established:
 October 11, 2002

 Street Address:
 Warrens, St. Michael, Barbados
- 4. Website Address: <u>www.cibcfcib.com</u>
- 5. Name of Parent Company: Canadian Imperial Bank of Commerce (CIBC)
- 6. Address of Parent Company: <u>Commerce Court, Toronto, Ontario, M5L 1A2 Canada</u>
- 7. Name of Parent Company Stock Exchange and Symbol: Toronto Stock Exchange (TSE) Symbol CM

8. Operating Companies:

FirstCaribbean International Bank Limited operates eight (8) wholly or majority owned entities as follows:

- FirstCaribbean International Bank (Barbados) Limited (Wholly owned) Address: Michael Mansoor Building, Warrens, St. Michael, Barbados Locations: Antigua and Barbuda; Barbados; Dominica; Grenada; St. Kitts and Nevis; St. Lucia; St. Vincent and the Grenadines
- FirstCaribbean International Bank (Bahamas) Limited (95.21% shareholding)
 Address: Shirley Street, Nassau, The Bahamas
 Locations: The Bahamas and Turks and Caicos Islands
- iii. FirstCaribbean International Bank (Cayman) Limited (Wholly owned) Address: FirstCaribbean House, 25 Main St., George Town, Grand Cayman, Cayman Islands Locations: Aruba, British Virgin Islands, Cayman Islands, Curacao and St. Maarten
- FirstCaribbean International Bank (Jamaica) Limited (Wholly owned) Address: 23-27 Knutsford Boulevard, Kingston, Jamaica Location: Jamaica
- v. FirstCaribbean International Wealth Management Bank (Barbados) Limited (Wholly owned) Address: Michael Mansoor Building, Warrens, St. Michael, Barbados Location: Barbados
- vi. **FirstCaribbean International 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 Trust Company (Bahamas) Limited (Wholly owned)
 Address: West Bay Street, Goodmans Bay Corporate Centre, Nassau, The Bahamas
 Location: The Bahamas
- viii. CIBC Bank and Trust Company (Cayman) Limited (Wholly owned)
 Address: FirstCaribbean House, 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)

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

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

11. Regulatory Authority Information:

The FirstCaribbean Group of Companies is licensed and supervised by the following Regulatory Authorities:

- FirstCaribbean International Bank (Barbados) Limited regulatory authorities are:
 - i. Central Bank of Barbados
 - ii. Eastern Caribbean Central Bank
- FirstCaribbean International Bank (Bahamas) Limited regulatory authorities are:
 - i. Central Bank of The Bahamas
 - ii. Turks and Caicos Islands Financial Services Commission
- FirstCaribbean International 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
 - iv. Central Bank of Aruba
- FirstCaribbean International Bank (Curacao) N.V. regulatory authority is:
 - i. Central Bank of Curacao and St. Maarten
- FirstCaribbean International Bank (Jamaica) Limited regulatory authorities are:
 - i. Bank of Jamaica
 - ii. Financial Services Commission
- FirstCaribbean International Wealth Management Bank (Barbados) Limited regulatory authority is:
 - i. Central Bank of Barbados



- FirstCaribbean International Bank (Trinidad and Tobago) Limited regulatory authorities are:
 - i. Central Bank of Trinidad and Tobago
 - ii. Trinidad and Tobago Securities and Exchange Commission
- CIBC Trust Company (Bahamas) Limited regulatory authorities are:
 - i. Central Bank of The Bahamas
 - ii. Securities Commission of The Bahamas
- CIBC 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?	\boxtimes	
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?	\boxtimes	
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?	\boxtimes	
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?	\boxtimes	
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)	\boxtimes	
6.	Does the Financial Institution's approved AML/ATF program include policies covering relationships with politically exposed persons consistent with industry best practice?	\boxtimes	
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?	\boxtimes	
8.	Does the Financial Institution have appropriate record retention procedures pursuant to applicable laws?	\boxtimes	
B. Risk	Assessment		
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?	\boxtimes	
C. Knov	w Your Customer Procedures		
i.	Has the Financial Institution implemented systems for the identification of its customers using independent verifiable sources including:		
	a. Identification of beneficial ownership (including ownership and control structure where applicable)?	\boxtimes	
	 b. Information regarding the purposes and nature of business relationship? c. On-going due diligence of the business relationship and scrutiny of transactions undertaken to ensure consistency with client profile? 	\boxtimes	
	d. Procedures that establish a record for each customer noting their respective identification documents at account opening?	\boxtimes	
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?	\boxtimes	
iii.	Does the Financial Institution have a policy that specifies how transactions involving occasional customers should be handled?	\boxtimes	
4.	Does the Financial Institution's Know Your Customer Policy include enhanced due diligence procedures for a. Politically exposed persons?		
	b. The handling of non-face-to-face business relationships?c. The use of intermediaries and other third party sources of business?	\boxtimes	
D. Reportable Transactions			
1.	Does the Financial Institution have policies or practices for the identification and reporting of unusual/suspicious transactions?	\boxtimes	



E. Transaction Monitoring		YES	NO
1.	Does the Financial Institution have procedures to identify transactions that are structured to avoid large cash reporting requirements?		
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?	\boxtimes	
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.)?		
4.	Does the Financial Institution require complete information for outgoing wire transfer instructions, including sender and beneficiary names, addresses, account numbers and purpose?		
F. AML/ATF Training			
1.	 Does the Financial Institution provide AML/ATF training to staff on a regular basis that includes: a. Know Your Customer Procedures? b. The means of identifying unusual/suspicious activity and internal procedures to report same? c. Examples of money laundering and terrorist financing? d. Internal procedures to detect and prevent money laundering and terrorist financing? 		
2.	Does the Financial Institution maintain records of executed training including attendance records and training materials used?		
3.	Does the Financial Institution communicate new AML/ATF laws or regulations or changes to existing laws or regulations to relevant employees?		

SECTION 3 – COMPLIANCE CONTACT INFORMATION

The Chief Compliance Officer (CCO) is Candice Huggins: email – <u>Candice.Huggins@cibcfcib.com</u>

The Chief Anti-Money Laundering Officer (CAMLO) is Annetta Francis: email - Annetta.Francis@cibcfcib.com

For further information regarding the contents of this AML/AFT questionnaire please contact our Compliance Helpdesk: email – <u>ComplianceHelpdesk@cibcfcib.com</u>