

## 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

1. **Legal and Trading Name:** FirstCaribbean International Bank Limited
2. **Date Established:** October 11, 2002
3. **Street Address:** Warrens, St. Michael, Barbados
4. **Website Address:** [www.cibfcib.com](http://www.cibfcib.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:**

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

- i. **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
- ii. **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
- iv. **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



E. Transaction Monitoring	YES	NO
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"/>
F. AML/ATF Training		
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"/>    <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/>    <input type="checkbox"/> <input type="checkbox"/> <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 Compliance Officer (CCO) is Candice Huggins: email – [Candice.Huggins@cibcfcb.com](mailto:Candice.Huggins@cibcfcb.com)

The Chief Anti-Money Laundering Officer (CAMLO) is Annetta Francis: email – [Annetta.Francis@cibcfcb.com](mailto:Annetta.Francis@cibcfcb.com)

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