



**CIBC's
Anti-Money Laundering and Anti-Terrorist Financing
Questionnaire**

Anti-Money Laundering and Anti-Terrorist Financing Questionnaire

Financial Institution Name:	Canadian Imperial Bank of Commerce ("CIBC")	
Address of Principal Location:	Commerce Court, 199 Bay Street Toronto, Ontario, Canada M5L 1A2	
Has your institution appointed a senior officer responsible for its Anti-Money Laundering and Anti-Terrorist Financing program?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
If you responded "yes" to the preceding question, please provide the person's name, position title, mailing address, telephone number and e-mail address:		
Stephen Harvey, Chief AML Officer CIBC, 199 Bay St., 10 th floor, Toronto, ON M5L 1A2 Telephone: 416-980-7261 / Fax: 416-980-7648 / e-mail: Stephen.Harvey@cibc.com		
Name and Title of Individual Completing this Questionnaire:	Stephen Harvey Chief AML Officer	
Date:	November 1 st 2007	
Name of Principal Regulator:	Office of the Superintendent of Financial Institutions ("OSFI")	
Do the responses provided below apply to:	Yes	No
• Your institution's domestic banking subsidiaries and branches in the country of head office jurisdiction? and/or	<input checked="" type="checkbox"/>	<input type="checkbox"/>
• Your institution's foreign banking subsidiaries and branches?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

I. General AML Policies, Practices and Procedures:	Yes	No
1. Does the AML compliance program require approval of the financial institution's board or a senior committee thereof?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Does the financial institution have a legal and regulatory compliance program that includes a designated Compliance Officer that is responsible for coordinating and overseeing the AML program on a day-to-day basis, which has been approved by senior management of the financial institution?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Has the financial institution developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions that have been approved by senior management?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. In addition to inspections by the government supervisors/regulators, does the financial institution client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	<input checked="" type="checkbox"/>	<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 checked="" type="checkbox"/>	<input type="checkbox"/>
6. Does the financial institution have policies covering relationships with politically exposed persons consistent with industry best practices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Does the financial institution have appropriate record retention procedures pursuant to applicable law?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. Does the financial institution require that its AML policies and practices 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 checked="" type="checkbox"/>	<input type="checkbox"/>
II. Risk Assessment	Yes	No
9. Does the financial institution have a risk focused assessment of its customer base and transactions of its customers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10. Does the financial institution determine the appropriate level of enhanced 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 checked="" type="checkbox"/>	<input type="checkbox"/>
III. Know Your Customer, Due Diligence and Enhanced Due Diligence	Yes	No
11. Has the financial institution implemented systems for the identification of its customers, including customer information in the case of recorded transactions, account opening, etc. (for example; name, nationality, street address, telephone	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<i>number, occupation, age/ date of birth, number and type of valid official identification, as well as the name of the country/state that issued it)?</i>		
12. 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)?	X	
13. Does the financial institution have a requirement to collect information regarding its customers' business activities?	X	
14. Does the financial institution collect information and assess its financial institution customers' AML policies or practices?	X	
15. Does the financial institution have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information collected at account opening?	X	
16. Does the financial institution take steps to understand the normal and expected transactions of its customers based on its risk assessment of its customers?	X	
IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds	Yes	No
17. Does the financial institution have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	X	
18. Does the financial institution have procedures to identify transactions structured to avoid large cash reporting requirements?	X	
19. Does the financial institution screen transactions for customers or transactions the financial institution deems to be of significantly high risk (which may include persons, entities or countries that are contained on lists issued by government/international bodies) that special attention to such customers or transactions is necessary prior to completing any such transactions?	X	
20. Does the financial institution have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products? (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.)	X	
21. Does the financial institution have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	X	
V. Transaction Monitoring	Yes	No
22. Does the financial institution have a monitoring program for suspicious or unusual activity that covers funds transfers and monetary instruments (such as travellers cheques, money orders, etc.)?	X	
VI. AML Training	Yes	No
23. Does the financial institution provide AML training to relevant employees that includes identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving the financial institution's products and services and internal policies to prevent money laundering?	X	
24. Does the financial institution retain records of its training sessions including attendance records and relevant training materials used?	X	
25. Does the financial institution have policies to communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	X	
26. Does the financial institution employ agents to carry out some of the functions of the financial institution and if so does the financial institution provide AML training to relevant agents that includes identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving the financial institution's products and services and internal policies to prevent money laundering?	X	
Please provide comments on any of the above responses:		