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A Message from Victor G. Dodig, President and CEO

At CIBC, we’re dedicated to our clients and focused on our common purpose – to help make your ambition a reality. As one team, 44,000 strong, we are putting our clients at the centre of everything we do. We also have a client-focused culture that is underpinned by our enduring values of trust, teamwork and accountability.

As we build a relationship-oriented bank for a modern world, it’s important that our team feels comfortable speaking up so we do the right things for our clients and each other. That’s why we ask our team to lead with authenticity and courage – to say what they mean, mean what they say, and do what needs to be done, even when it’s difficult.

We all play a role in maintaining the integrity of our bank – a place where everyone has the right to be treated with dignity and respect.

The Code of Conduct (Code) is our playbook, outlining the principles for how we behave as we help our clients achieve their ambitions. It’s important for all of us to be familiar with the Code and to speak up if something does not seem right. You should feel confident that your concerns will be taken seriously, investigated and addressed appropriately.

At our core, we are a genuinely caring bank. I’m proud to lead a team that’s committed to a culture built on our shared purpose and values.

Victor G. Dodig
President and CEO
1. Overview of the Code

1.1 What is the purpose of the Code?
We all play a role in maintaining the integrity of our bank – a place where everyone has the right to be treated with dignity and respect. The Code sets out principles for how we behave as we help our clients achieve their ambition:

- We act with honesty and integrity.
- We ensure a respectful and safe workplace.
- We identify and avoid conflicts.
- We serve our clients and protect our brand, our investors and our environment.
- We safeguard information of our clients and team members and we protect other CIBC assets.
- We cooperate with investigations.

The Code is our playbook and identifies policies to guide our actions - an important element as we transform into a purpose-led organization and build a relationship-oriented bank for a modern world. This means respecting both the letter and the spirit of the Code in everything we do.

1.2 Who has to follow the Code?
The Code applies to every single one of us at CIBC and our wholly-owned subsidiaries. The Code applies to our interactions at work – and outside work – with team members, clients, shareholders, regulators, governments, suppliers, competitors and the wider community.

1.3 What do we expect of our managers?
Managers play an important role by modelling and helping to ensure acceptable standards of behaviour for team members. A manager is often the first point of contact if a team member has a question about the Code. Managers also support and protect from retaliation all team members who, in good faith, report a potential violation of the Code.

1.4 How should we use the Code?
The Code guides us to do the right thing. Each of us has a personal responsibility to follow the Code. We must read and understand the Code and live by its principles. If anything is unclear, we speak with our manager.

At the end of the Code, there are links to key policies, including policies that are specific in the regions where we do business. Our actions and decisions have to be consistent with these policies. We must read the policies listed in section 8 of this Code relevant for our role, area of business and region. If there are any questions about the Code or CIBC policies, we contact our manager, the Code of Conduct, Mailbox or one of the contacts listed at the end of the Code.

The terms “we”, “our”, “us” and “team members” refer collectively to all CIBC employees, contingent workers and CIBC directors, and are intended to indicate that adherence to the Code is both a personal and a shared responsibility of all CIBC employees, contingent workers and CIBC directors.
1.5 How do I speak up?
If something does not seem right, or you want to raise a concern about your role, activities you believe are inconsistent with the Code, or something that might be damaging to CIBC or our stakeholders, you must immediately speak up. There are many ways to speak up.

- Your manager is your first point of contact, who you can speak to about your concern.
- If the concern is about your manager, or you are uncomfortable speaking to your manager, you can speak to your manager’s manager or any contact listed at the end of the Code.
- If you prefer to be anonymous, there is also a dedicated Whistleblower Hotline. Any concern you raise is taken seriously in accordance with our Whistleblower Policy. You do not have to identify yourself. In North America, call 1-888-937-3247. In the United Kingdom, call 0808-234-2961. In other regions, call collect at 770-613-6301. The hotline is available in many languages.

1.6 What if I am concerned about retaliation for speaking up?
There is no retaliation for speaking up. We want to be clear: No one may suspend, discharge, discriminate against, harass, threaten or otherwise retaliate against a team member or other person in any way for:

- reporting in good faith actual or possible misconduct; or
- providing information for, or participating in, an investigation.

If you believe that you are being retaliated against for speaking up, you should contact your manager or the appropriate contact listed at end of the Code.

Nothing in the Code, any CIBC policies, or any agreement we enter into with CIBC, prevents us from engaging in activities permitted by whistleblower legislation.

Our Whistleblower Policy provides more information about how we support team members who might have a concern about retaliation for raising an issue.

1.7 What happens if I don’t follow the Code?
There are consequences if you don’t follow the principles and spirit of the Code and CIBC policies. Employees could face disciplinary action, up to and including termination of employment for cause, without notice or pay in lieu of notice. An employee’s performance assessment and compensation may also be impacted. Contingent workers could face termination of their assignment.

For any of us, failure to follow the Code and CIBC policies might also lead to civil, criminal or regulatory action against us or CIBC.

1.8 How does CIBC make sure the Code is effective?
We take different steps to ensure the Code is effective. There is a training program on the Code and every year all team members must attest that they have read, understood and will always follow the Code.

As part of the ongoing monitoring and reporting process, we record and report to CIBC’s Board of Directors on breaches of the Code so that we can improve our Code, our policies and how we make decisions.

Team members who are seeking a waiver of a provision in the Code due to exceptional circumstances should speak to their manager, and then contact the Code of Conduct, Mailbox for advice. A waiver of the Code is rarely approved.

Legal requirements provide that CIBC’s Board of Directors must approve waivers for Board members and certain executive officers, and publicly disclose any waivers.
2. We act with honesty and integrity

Honesty and integrity are at the heart of what we do and how we do it. This is how we earn the trust of our team members, our clients, our shareholders and our communities. We respect the spirit of the Code even when the Code does not specifically address a particular situation we are facing.

When we act with honesty and integrity, we show these behaviours:

2.1 We comply with the law and CIBC policies

CIBC is a global bank subject to laws and regulations where we do business. We must be familiar and comply with the law and CIBC policies. Team members who are licensed by a regulatory or professional body must follow their licensing or registration requirements. We recognize that any breach of the law or CIBC policies can have serious consequences for CIBC and each of us.

We know and respect our clients. When we act with integrity, transparency and respect in dealing with our clients, we:

• are diligent in knowing our clients’ financial situation (including their financial needs, investment objectives, risk tolerance, goals and aspirations);
• recommend products and services that are appropriate to our clients’ financial situation;
• communicate with our clients in a timely manner with clear language that is not misleading;
• obtain clear consent from our clients to purchase products or services;
• provide clients with complete information they need to make the financial decisions that are right for them; and
• take ownership by providing a fair, speedy and transparent resolution whenever issues arise.

We demonstrate personal integrity. We immediately tell our manager when we are charged with a criminal offence even if we are not guilty of the offence and we keep our manager informed of proceedings about the offence.

Managers are responsible for contacting Corporate Security about the charge and the outcome at the CorpSecurity, Mailbox (or in the US region, US Corporate Security).

2.2 We prevent corruption, bribery, fraud and other financial crime

We protect CIBC and our clients from financial crimes. This means we do not participate in any way in bribery, fraud, kiting, kick-backs, theft, payoffs, forgery, tax evasion, misselling or other corrupt business practices. For example, we do not issue cheques or other forms of payment where there are insufficient funds (e.g., kiting) and we never forge a client’s signature. We do not accept or offer bribes or payoffs and do not engage in other corrupt business practices. We immediately report any concerns about these types of suspicious behaviours (including by team members, suppliers, clients, government representatives or others).

We also help protect CIBC and its clients from being associated with money laundering, terrorist financing, or from transacting with countries, entities or individuals subject to sanctions requirements.
How can we help prevent financial crime?

- We do not help clients alter, remove or mask information to avoid legal requirements, or to perpetrate fraud.
- We report unusual transactions to the Enterprise Anti-Money Laundering group based on what we know about our clients and normal banking activity.
- We speak up when we think CIBC is being used for criminal activity by contacting the Enterprise Anti-Money Laundering group.
- We cooperate with investigations by CIBC.

2.3 We act within our scope of authority

We act within the scope of our employment and assigned duties. We are responsible for understanding our authorities, limits on those authorities and how we use them. We only provide advice to our clients that we are authorised to provide in the course of our work. This means:

- we do not give clients financial, trust, legal, tax, investment or other advice where CIBC has not authorized us;
- we do not act outside the authority permitted by our role or our professional qualifications, licence or our regulatory registration; and
- we do not process a transaction for a client or enter into an agreement for CIBC without proper authorization and documentation.

2.4 We act responsibly in managing insider information and our personal trading in securities

If we have insider information, we never trade in shares or other securities of CIBC or other public companies, nor do we talk to others about that company. We know these actions are illegal.

We comply with internal information barriers established to control insider information. We never disclose insider information, except as required in the normal course of business or in the performance of our assignment and always as set out in CIBC policies. We also follow CIBC policies that may apply to us for personal trading, including pre-clearing trades in securities and trading in CIBC shares.

What is “insider information”?

Insider information means material non-public information about a public company (including CIBC) that, if disclosed, would likely affect the market price of the company’s securities or that a reasonable investor would likely consider important in making an investment decision to buy, hold or sell securities.
2.5 We compete fairly
We deal fairly, honestly and legally with our competitors. This means we do not communicate, acquire or use trade secrets or proprietary information of others unless we have the right to do so. Laws prevent CIBC from participating in activities that lessen competition. This means:

- we do not conspire with competitors to fix the terms of a transaction, product or service to be offered to clients, suppliers and distributors, or by others;
- we do not agree with competitors to avoid competing for clients in particular product categories or geographic markets; and
- we do not get involved in transactions with clients that require clients to:
  - bring additional business to CIBC;
  - purchase additional products from CIBC; or
  - agree not to purchase a competitor’s products.

These laws are complex so if any of us have concerns about proposed dealings with competitors or clients, we will discuss them with the Legal Department (or in the US region, with US Compliance).

2.6 We respect intellectual property
Intellectual property is a special type of property, which we may create while working for CIBC. For example, our logos and slogans – even our websites, written publications, trade secrets and business processes – are intellectual property that belong to CIBC, even when we leave. CIBC intellectual property is protected by trademark, copyright and patent laws and cannot be used by others without our approval.

Other companies also protect their intellectual property and enforce their intellectual property rights. Before we copy, distribute or use intellectual property that belongs to someone else, we should ensure that we have the owner’s approval. For example, we should be aware that publications in any form of media, images, photographs, broadcasts, recordings, online materials and software are often protected by copyright law. Company brand names, logos, slogans, designs, scents, colour, sounds, taste, holograms and moving images may be protected by trademark law. We consult the Legal Department before using intellectual property, especially if we are not certain that it belongs to CIBC.
3. We ensure a respectful and safe workplace

At CIBC, we know that diverse teams working in an inclusive environment are more innovative, make better decisions, reduce risk and deliver a superior experience for our clients. All team members have a role to play in helping us to achieve CIBC’s inclusion and diversity goals and creating an accessible workplace where everyone feels that they belong. This is important to our clients and our shareholders, and it’s also a part of our regulatory responsibilities. We must treat team members, clients, visitors, suppliers and the public respectfully.

When we treat others with respect and maintain a safe workplace, we show these behaviours:

3.1 We prohibit discrimination and harassment
We have the right to work in an environment that is free of discrimination and harassment. Discrimination and harassment of any sort is prohibited and will not be tolerated. We are familiar with and follow CIBC policies about respect in the workplace, anti-discrimination and anti-harassment.

3.2 We have a safe and secure workplace
We have the right to work in an environment that is safe and free from violence or threats of violence. We know that violence of any sort is prohibited and will not be tolerated. We promote a healthy and safe working environment and report any health and safety concerns as soon as possible. We are familiar with and follow CIBC policies on the prohibition of violence, and health and safety in the workplace.

CIBC is also committed to ensuring that slavery and human trafficking are not used in CIBC businesses or supply chains. We follow CIBC policies on dealing with suppliers and report any concerns.

3.3 We follow restrictions on alcohol and drugs
We behave in a way that takes into account our impact on team members, clients, and the broader community. When we are representing CIBC at our premises and outside of the office:

- we do not use recreational cannabis;
- we do not possess illegal drugs;
- we do not become impaired by alcohol or drugs (however, drugs prescribed by a licensed health care provider and taken as directed are permitted provided we are able to safely do our work); and
- we do not serve alcohol at a CIBC event unless approved by an executive.

If we serve alcohol at a CIBC event, we follow these steps:

- Obtain approval from an executive (or in the US region, a US leadership team member). This approval can be one-time or ongoing.
- The manager responsible for the CIBC event must be in attendance if alcohol is served and must ensure that reasonable procedures and safeguards are in place, so that serving or consuming alcohol is done safely and responsibly and that any required licenses are obtained.
- If we consume alcohol at a CIBC event, we will do so responsibly. We use transportation that ensures we remain safe and secure.
3.4 We do not carry on political activities or religious advocacy at work

CIBC respects our right to individual political beliefs and religious practices. However, we express these beliefs or practices as individuals and not as a representative of CIBC.

We will not carry on political activities or engage in religious advocacy at work or while representing CIBC. This includes seeking contributions, campaigning, and promoting political or religious causes, beliefs or practices. This in no way limits our right to observe our individual political or religious beliefs and practices at work in a private manner. We must follow regional policies and obtain approval from our regional Government Relations contact for any requests for political contributions from CIBC.
4. We identify and avoid conflicts

A conflict of interest and even the perception of a conflict of interest, can damage CIBC’s reputation. We know that acting honestly and with integrity means we avoid any situation where our personal interest may conflict, or be perceived as a conflict with the interests of CIBC, team members, our clients, or suppliers.

What is a “close personal relationship” that can cause a conflict of interest?

A close personal relationship involves a personal connection which may be the result of an emotional bond or financial interaction. Common examples include family members, romantic partners or others with whom we have a financial relationship.

To avoid conflicts:

- We will not be in a reporting relationship or work with someone with whom we share a close personal relationship where we have, or may be perceived to have the ability to impact their compensation, work conditions, or promotion prospects.
- We will not use information we possess as a result of our CIBC role to further the interests of someone with whom we have a close personal relationship.
- We will not refer other team members or clients to a business that is owned or operated by ourselves or someone with whom we have a close personal relationship, unless permitted by CIBC policies or procedures.

4.1 We are careful about gifts, entertainment or other benefits that we offer or accept

Giving or accepting a gift, entertainment or other benefit to or from a client, supplier, prospective client, or public official might create an actual, potential or perceived conflict of interest, especially where the value is more than nominal.

Even where a conflict does not exist, the gift, entertainment, or other benefit could be viewed as an attempt to influence a business decision. We are familiar with the restrictions in CIBC policies on giving or accepting gifts, entertainment, or other benefits. We adhere to annual maximum gift limits and other requirements in CIBC policies when we give or accept gifts, entertainment, or other benefits, and entertain clients or others. We do not give or accept a gift, entertainment or other benefit if it could create an actual, potential or perceived obligation (or expectation) that could conflict with our work at CIBC. We never try to influence the outcome of an official decision by offering or receiving a gift, entertainment or other benefit.

Here are some examples of gifts, entertainment or other benefits:

- products or services with more than a nominal value
- discounted products
- free travel or accommodation
- event tickets
4.2 We do not borrow or lend personal funds

We do not borrow or lend personal funds or other personal property (directly or indirectly) to a client or supplier who has an ongoing or prospective business relationship with us. This restriction does not apply to:

- transactions with family members; or
- transactions with clients who are financial intermediaries (such as department stores or other financial institutions) if the transaction is conducted on market terms and conditions.

We avoid borrowing, lending or pooling personal funds with another team member.

4.3 We respect our suppliers

We make every effort to select and deal with suppliers that have high standards of conduct that align with our principles in CIBC policies on supplier conduct. We are careful to avoid a conflict of interest in selecting a supplier. For example, we do not choose a supplier on the basis of a close personal relationship.

4.4 We are cautious about being a beneficiary, executor, power of attorney, guardian or other personal representative

A conflict might arise where we accept signing authority or a power of attorney from our client for that client’s account. We might also discover that a client has made us a beneficiary, executor or other personal representative (e.g., guardian, committee, or curator). CIBC discourages team members from accepting these designations but if we discover that the designation has been made, we inform our manager. Depending on the circumstances, we might have to ask our client to revoke the designation. If we want to act as a personal representative or signing authority or remain as a beneficiary, we must obtain prior approval from our manager and the regional Compliance Department. In most situations, this does not prevent us from being a beneficiary, or serving as executor, power of attorney, guardian or other personal representative of a family member.

Remember, CIBC has the right to require us to renounce any bequest or appointment or to remove ourselves from dealing with a client’s estate where there is an actual, potential or perceived conflict of interest.
4.5 We obtain appropriate approval(s) before engaging in outside activities and investments

CIBC supports our participation in our communities through taking roles in community organizations, clubs and associations. However, we avoid positions, associations, investments or other outside activities that may interfere with, or be perceived to interfere with our work at CIBC and our judgment about doing the right thing for our clients and with our team members. Team members are expected to devote their working hours to their CIBC work. CIBC policies require team members to obtain prior approval from their manager and/or the regional Compliance Department to participate in an outside activity so that any potential conflicts of interest can be avoided.

Outside activities include:

- additional position or employment outside CIBC;
- carrying on business activities outside CIBC;
- investment in a business other than a public company;
- acting as a party to an estate or tax planning arrangement (other than a family member’s arrangement), for example, acting as settlor, donor or subscriber of shares;
- controlling interest in a public or private business;
- owning a rental property that is not your principal residence (but if the rental property is your principal residence, no approval is required);
- acting as a personal representative for a client (other than a family member); or
- campaigning/holding a public office.

If we are interested in taking a position as a director of a company, organization or association (including not-for-profit organizations or associations), or as a member of a board advisory committee, we must obtain prior approval from our manager and the regional Compliance Department. Generally, it is not acceptable to act as an officer or director of a client’s business. In addition, we realize that acting as a director of a public company also requires CEO approval because of the time commitment required to serve on public company boards and the potential conflict of interest that could arise if the company is or becomes our client. These requests are rarely allowed.

CIBC Board members follow board policies to obtain approval for outside activities.

4.6 We follow restrictions on processing personal transactions

Processing transactions for ourselves or for those close to us can create a conflict of interest. We follow restrictions in CIBC policies on processing personal transactions. We do not process, or ask another team member who reports to us directly or indirectly to process, a transaction for us, a member of our immediate family or anyone with whom we share a close personal relationship, a financial interest or for whom we are a personal representative (e.g., trustee, executor, guardian, committee, curator, or a power of attorney).

What do we mean by “immediate family”? 

In our Code, when we say “immediate family”, we mean your spouse or common law partner, parents, sisters/brothers, children, parents-in-law, sisters/brothers-in-law, step-children, grandparents, step-sisters/brothers, grandchildren, legal dependents, legal guardian, and any corporation or other legal entity that is controlled by you and/or members of your immediate family.
5. We serve our clients and protect our brand, our investors and our environment

We are proud of our bank - who we are, the role we play in our clients’ lives and the impact we have on our communities.

When we serve our clients and protect our brand, investors and the environment, we show these behaviours:

5.1 We represent CIBC

CIBC respects our right to publicly express our personal views. We do not participate in activities that may compromise CIBC’s image or reputation, whether during or outside work hours. We do not disparage, defame, embarrass or harass team members, clients, visitors, suppliers or competitors.

We use social media appropriately. We must all understand what is expected of us when using social media to ensure that we protect our brand, reputation, client information, and other CIBC information and that we maintain standards of professionalism, honesty, and integrity. To understand if we’re using social media appropriately, we must ask ourselves if others might be offended by our posts or those we share or like.

We use CIBC’s brand name and trademarks with permission. We may only use CIBC’s brand name and trademarks outside of CIBC as part of our regular job duties or at an external function where CIBC’s participation has been previously approved.

We are careful when communicating with government agencies, regulators or officials. When we communicate with a government agency, regulator or official, we avoid any suggestion that we are communicating on CIBC’s behalf unless we have the authority to do so. In certain situations, team members who communicate with government officials on behalf of CIBC must comply with lobbying activity pre-approval, registration and reporting requirements in CIBC policies.

We obtain approval(s) before public speaking, speaking with media or writing engagements. If we plan to speak or write in a public forum as a representative or may be perceived as a representative of CIBC (e.g., speaking to the media, presenting a lecture or publishing an article, submitting a white paper or external report for an industry conference), or are contacted by a reporter, we obtain prior approval in advance from our manager and CIBC Communications and Public Affairs (or in the US region, from US Marketing & Communications).

5.2 We participate in community activities responsibly

CIBC supports our involvement in community activities. We know that by participating in those activities, we are, or may be perceived to be, representatives of CIBC.

When soliciting charitable donations or fundraising, whether on behalf of CIBC or another organization, we emphasize the voluntary nature of the donation. We are careful not to put team members (particularly those who report to us, directly or indirectly), clients or suppliers in a position where they may feel obligated to contribute - or fear being treated unfairly if they do not make a donation.
5.3 We provide full and fair disclosure
All of our communications, whether internal or external must be truthful, accurate and complete, and must not mislead others. We consult with our manager if we are unsure about the accuracy or completeness of information we receive.

Inappropriate disclosure includes:
• misrepresenting a client’s financial position;
• modifying or fabricating client documents even if the client consents;
• changing dates on previously signed forms;
• forging, altering or misusing anyone’s identity, signature or initials;
• recording or knowingly approving a false, misleading or deceptive transaction; or
• bypassing procedures that ensure the integrity of CIBC’s records and disclosures.

5.4 We protect our environment
CIBC believes that environmental responsibilities and business objectives are connected, as a healthy and sustainable environment fosters sustainable economic growth. We are responsible for taking reasonable care to ensure that CIBC’s business activities are conducted in an environmentally prudent manner that contributes over the long term to CIBC’s shareholder value.
6. We safeguard information of our clients and team members and we protect other CIBC assets

6.1 We protect confidentiality and privacy

We take all reasonable steps to preserve the confidentiality and privacy of CIBC information. This includes accessing and using CIBC information only for the purposes intended, as directed by our manager or business procedures, and disclosing that information only to those who have a specific and authorized business need to know.

We will collect, use, share or view clients’ or team members’ information only when we have a reasonable business purpose for doing so and in compliance with applicable laws and our access authority.

How do we protect confidentiality and privacy?

- We do not access files, profiles, systems, account or other information of clients, team members, family members or ourselves if we do not have a valid business reason for doing so.
- We avoid discussing or otherwise disclosing confidential information in public places.
- We do not send or forward information that is classified as Internal or higher to or from our non-CIBC personal email address directly or indirectly. We minimize the use of printed copies of CIBC information for work.
- If we have concerns about the protection of CIBC information, or we become aware of a breach of confidentiality or privacy, we immediately communicate those concerns to the privacy contact in our region or line of business.
6.2 We maintain CIBC’s information security

CIBC’s information is one of our most important assets and we safeguard CIBC’s technology systems, resources, software, applications or facilities when we follow CIBC policies that govern their use. CIBC may record and monitor our activity on its technology systems, resources and facilities for the purpose of detecting unauthorized use, sharing or access.

When sending communications through CIBC’s networks, we must always maintain a professional tone and comply with the Code and CIBC’s policies for our behaviour. We follow these requirements whether we are using CIBC’s equipment or our own.

Our personal use of CIBC systems must be reasonable, and must not interfere with our job responsibilities and work-related needs. We must not use these systems to view or communicate inappropriate material. These systems also must not be used to do work on behalf of another business or organization.

How do we protect CIBC information?

- We never use personal email accounts for CIBC information. For guidance on the appropriate use of email, refer to applicable information security policies.
- We only install authorized CIBC software on devices when using them for work. We ensure we follow approved processes for doing so (e.g., use ServiceNow and approved apps from a corporate store).
- We do not share our passwords for CIBC systems and we protect our devices from unauthorized access.
- When we conduct work for CIBC on any device or network, we must only use electronic messaging channels approved and provided by CIBC.

6.3 We safeguard CIBC’s property

We have controls in place to protect CIBC property. These controls include use of safes, vaults and other security equipment; physical or logical access control; and other security-related processes. CIBC may require us to return or destroy CIBC property at any time.

6.4 We follow business expense policies

When we incur expenses or approve expenses on behalf of CIBC, we follow CIBC policies to ensure the expenses are reasonable, for a valid business purpose and supported by receipts.

6.5 We maintain complete and accurate records

If CIBC’s records are incomplete or inaccurate, the trust of our stakeholders and the integrity of our reputation may be compromised. We ensure that records of team members, clients, suppliers or others adhere to CIBC’s policies.
7. We cooperate with investigations

We may be asked to participate in an internal or external investigation, inquiry, or review of concerns or possible misconduct. We have a duty to cooperate and provide honest, accurate, complete and timely information. When requests are made by an external party, there are steps we must take before responding. We will notify our manager and contact the appropriate CIBC department listed in section 8 of this Code.

If we are disclosing information to a regulator or enforcement agency under whistleblower legislation, we do not have to contact any CIBC department to do so.
8. **Speak up and get advice**

Omitted.

**Appendix 1: Seeking additional guidance (Global)**

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