



2017 CIBC UK Tax Risk Management Strategy

CIBC's UK tax risk management strategy has four elements:

1. UK group approach to risk management and governance arrangements

CIBC will ensure the relevant UK entities, CIBC London Branch and CIBC World Markets Plc comply with their UK tax obligations and pay taxes legally due.

CIBC's UK taxation department will safeguard CIBC's reputation through pro-active identification, measurement and management of potential UK tax risk. Risk is defined as the combination of the probability of an event and its consequences. Potential events have consequences that constitute opportunities for benefit (upside) or threats to success (downside). CIBC's strategy considers risk from both perspectives and so covers both positive and negative aspects of tax risk.

Due attention will be given to the impact of tax risk on the relationship with Her Majesty's Revenue and Customs (HMRC). Any material UK tax risks identified by CIBC's UK taxation department will be reported to CIBC's Global Head of Taxation, and managed through collaborative engagement with the relevant stakeholders, including consulting advisors to obtain objective opinions as necessary.

2. Attitude of the UK group towards tax planning

Per CIBC group policy, any tax planning affecting a UK tax obligation should be effective if contested. Opinions sought from internal or external advisors could be used to establish that this criterion has been met, before such planning receives further consideration through the internal risk appraisal process, as necessary.

3. UK tax risk tolerance

- Avoiding tax risk: CIBC will avoid taking UK tax risk, by not participating in transactions on own account or structuring transactions for clients, where the transaction is seen as contrary to the intentions of UK Parliament (as understood by CIBC).
- CIBC may plan its tax affairs to take advantage of available reliefs or well established and accepted structures or arrangements whose result may be to lower tax charges. As a commercial organisation, CIBC is entitled to organise its affairs so as to manage its tax liabilities consistent with tax legislation and practice.
- CIBC does not provide tax advice to clients in respect of UK taxes, and will take no responsibility for the tax affairs of its clients. In entering into arrangements, CIBC shall normally be entitled to take the opinions or representations of its clients, and of their advisors, on their face without formal enquiry.
- CIBC does not intend to support clients who wish to undertake arrangements whose primary motive appears obviously to be the avoidance of taxes without apparent commercial rationale.
- CIBC will support clients wishing to enter into arrangements of true commercial substance which may also benefit their tax position, provided they are taking advantage of available reliefs, or well established and accepted structures and arrangements.



4. Dealing with HMRC

CIBC's UK taxation department will "maintain an open, professional and transparent relationship" with HMRC, as envisaged by the UK Code of Practice on Taxation for Banks, and as consistent with its primary tax risk management mandate.



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Publication Deadline: The strategy for the financial year to 31 October 17, will be published before the end of that year. Subsequent strategies must be published within 15 months of date of the previous strategy.

Compliance statement: For the avoidance of doubt, CIBC London Branch and CIBC World Markets Plc regard this publication as complying with the duty per Finance Act 2016, Schedule 19 to publish such a strategy in the current financial year.

