



Disclosure template for main features of regulatory capital instruments			
Common Shares			
1	Issuer	Canadian Imperial Bank of Commerce	CIBC FirstCaribbean International Bank
2	Unique identifier (eg CUSIP, ISIN, or Bloomberg identifier for private placement)	136069101	BBP4161W1093
3	Governing law(s) of the instrument	Federal laws of Canada	Laws of Barbados
4	Regulatory treatment		
4	Transitional Basel III rules	Common Equity Tier 1	Common Equity Tier 1
5	Post-transitional Basel III rules	Common Equity Tier 1	Common Equity Tier 1
6	Eligible at solo/group/group&solo	Solo and Group	Solo and Group
7	Instrument type (types to be specified by jurisdiction)	Common shares	Common shares
8	Amount recognised in regulatory capital (Currency ¹ in millions, as of most recent reporting date)	13,158	147
9	Par value of instrument	n/a	n/a
10	Accounting classification	Shareholders' equity	Non-controlling interest in consolidated subsidiary ²
11	Original date of issuance	Various	Various
12	Perpetual or dated	Perpetual	Perpetual
13	Original maturity date	no maturity	no maturity
14	Issuer call subject to prior supervisory approval	No	No
15	Optional call date, contingent call dates and redemption amount	n/a	n/a
16	Subsequent call dates, if applicable	n/a	n/a
17	Coupons/dividends		
17	Fixed or floating dividend/coupon	Floating	Floating
18	Coupon rate and any related index	Discretionary; declared as a dollar amount per share	Discretionary; declared as a dollar amount per share
19	Existence of a dividend stopper	No	No
20	Fully discretionary, partially discretionary or mandatory	Fully discretionary	Fully discretionary
21	Existence of a step up or other incentive to redeem	No	No
22	Noncumulative or cumulative	Non-cumulative	Non-cumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger (s)	n/a	n/a
25	If convertible, fully or partially	n/a	n/a
26	If convertible, conversion rate	n/a	n/a
27	If convertible, mandatory or optional conversion	n/a	n/a
28	If convertible, specify instrument type convertible into	n/a	n/a
29	If convertible, specify issuer of instrument it converts into	n/a	n/a
30	Write-down feature	No	No
31	If write-down, write-down trigger (s)	n/a	n/a
32	If write-down, full or partial	n/a	n/a
33	If write-down, permanent or temporary	n/a	n/a
34	If temporary write-down, description of write-down mechanism	n/a	n/a

¹ All amounts in CAD unless otherwise indicated.

² 8.33% of the common shares held by third parties.

Disclosure template for main features of regulatory capital instruments						
Class A Preferred Shares - Series 39, 41, 43, 45 and 47 (NVCC)						
1	Issuer	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce
2	Class A Preferred Shares	Series 39	Series 41	Series 43	Series 45	Series 47
3	Unique identifier (eg CUSIP, ISIN, or Bloomberg identifier for private placement)	136069440	136069424	136069390	136070208	136070877
4	Governing law(s) of the instrument	Federal laws of Canada	Federal laws of Canada	Federal laws of Canada	Federal laws of Canada	Federal laws of Canada
Regulatory treatment						
5	Transitional Basel III rules	Additional Tier 1	Additional Tier 1	Additional Tier 1	Additional Tier 1	Additional Tier 1
6	Post-transitional Basel III rules	Additional Tier 1	Additional Tier 1	Additional Tier 1	Additional Tier 1	Additional Tier 1
7	Eligible at solo/group/group&solo	Solo and Group	Solo and Group	Solo and Group	Solo and Group	Solo and Group
8	Instrument type (types to be specified by jurisdiction)	Preferred shares	Preferred shares	Preferred shares	Preferred shares	Preferred shares
9	Amount recognised in regulatory capital (Currency ¹ in millions, as of most recent reporting date)	400	300	300	798	450
10	Par value of instrument	25	25	25	25	25
11	Accounting classification	Shareholders' equity	Shareholders' equity	Shareholders' equity	Shareholders' equity	Shareholders' equity
12	Original date of issuance	June 11, 2014	December 16, 2014	March 11, 2015	June 2, 2017	January 18, 2018
13	Perpetual or dated	Perpetual	Perpetual	Perpetual	Perpetual	Perpetual
14	Original maturity date	no maturity	no maturity	no maturity	no maturity	no maturity
15	Issuer call subject to prior supervisory approval	Yes	Yes	Yes	Yes	Yes
16	Optional call date, contingent call dates and redemption amount	Redeemable at par July 31, 2019.	Redeemable at par January 31, 2020.	Redeemable at par July 31, 2020.	Redeemable at par July 31, 2022.	Redeemable at par January 31, 2023.
17	Subsequent call dates, if applicable	July 31, 2024 and on July 31st every 5 years thereafter.	January 31st every 5 years thereafter.	July 31, 2025 and on July 31st every 5 years thereafter.	July 31, 2027 and on July 31st every 5 years thereafter.	January 31st every 5 years thereafter.
Coupons/dividends						
18	Fixed or floating dividend/coupon	Fixed	Fixed	Fixed	Fixed	Fixed
19	Coupon rate and any related index	3.90%	3.75%	3.60%	4.40%	4.50%
20	Existence of a dividend stopper	Yes	Yes	Yes	Yes	Yes
21	Fully discretionary, partially discretionary or mandatory	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary
22	Existence of a step up or other incentive to redeem	No	No	No	No	No
23	Noncumulative or cumulative	Non-cumulative	Non-cumulative	Non-cumulative	Non-cumulative	Non-cumulative
24	Convertible or non-convertible	Convertible	Convertible	Convertible	Convertible	Convertible
25	If convertible, conversion trigger (s)	Convertible: 1. when a "Trigger Event" as defined by OSFI occurs; or 2. at Holder's option on July 31, 2019 and on July 31st every 5 years thereafter	Convertible: 1. when a "Trigger Event" as defined by OSFI occurs; or 2. at Holder's option on January 31, 2020 and on January 31st every 5 years thereafter	Convertible: 1. when a "Trigger Event" as defined by OSFI occurs; or 2. at Holder's option on July 31, 2020 and on July 31st every 5 years thereafter	Convertible: 1. when a "Trigger Event" as defined by OSFI occurs; or 2. at Holder's option on July 31, 2022 and on July 31st every 5 years thereafter	Convertible: 1. when a "Trigger Event" as defined by OSFI occurs; or 2. at Holder's option on January 31, 2023 and on January 31st every 5 years thereafter
26	If convertible, fully or partially	1. Always converts fully on a conversion under a "Trigger Event"; 2. may convert fully or partially	1. Always converts fully on a conversion under a "Trigger Event"; 2. may convert fully or partially	1. Always converts fully on a conversion under a "Trigger Event"; 2. may convert fully or partially	1. Always converts fully on a conversion under a "Trigger Event"; 2. may convert fully or partially	1. Always converts fully on a conversion under a "Trigger Event"; 2. may convert fully or partially
27	If convertible, conversion rate	1. For a conversion under a "Trigger Event" - formula driven; refer to prospectus supplement 2. Otherwise converts on a one-to-one basis.	1. For a conversion under a "Trigger Event" - formula driven; refer to prospectus supplement 2. Otherwise converts on a one-to-one basis.	1. For a conversion under a "Trigger Event" - formula driven; refer to prospectus supplement 2. Otherwise converts on a one-to-one basis.	1. For a conversion under a "Trigger Event" - formula driven; refer to prospectus supplement 2. Otherwise converts on a one-to-one basis.	1. For a conversion under a "Trigger Event" - formula driven; refer to prospectus supplement 2. Otherwise converts on a one-to-one basis.
28	If convertible, mandatory or optional conversion	1. Mandatory if a "Trigger Event" conversion 2. Optional	1. Mandatory if a "Trigger Event" conversion 2. Optional	1. Mandatory if a "Trigger Event" conversion 2. Optional	1. Mandatory if a "Trigger Event" conversion 2. Optional	1. Mandatory if a "Trigger Event" conversion 2. Optional
29	If convertible, specify instrument type convertible into	1. For conversion under a "Trigger Event" - converts to Common Equity Tier 1 2. Converts to Additional Tier 1	1. For conversion under a "Trigger Event" - converts to Common Equity Tier 1 2. Converts to Additional Tier 1	1. For conversion under a "Trigger Event" - converts to Common Equity Tier 1 2. Converts to Additional Tier 1	1. For conversion under a "Trigger Event" - converts to Common Equity Tier 1 2. Converts to Additional Tier 1	1. For conversion under a "Trigger Event" - converts to Common Equity Tier 1 2. Converts to Additional Tier 1
30	If convertible, specify issuer of instrument it converts into	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce
31	Write-down feature	No	No	No	No	No
32	If write-down, write-down trigger (s)	n/a	n/a	n/a	n/a	n/a
33	If write-down, full or partial	n/a	n/a	n/a	n/a	n/a
34	If write-down, permanent or temporary	n/a	n/a	n/a	n/a	n/a
35	If temporary write-down, description of write-down mechanism	n/a	n/a	n/a	n/a	n/a
36	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Tier 1 Notes	Tier 1 Notes	Tier 1 Notes	Tier 1 Notes	Tier 1 Notes
37	Non-compliant transitioned features	No	No	No	No	No
38	If yes, specify non-compliant features	n/a	n/a	n/a	n/a	n/a

¹ All amounts in CAD unless otherwise indicated.

Disclosure template for main features of regulatory capital instruments			
Tier 1 Notes			
1	Issuer	CIBC Capital Trust	CIBC Capital Trust
	Tier 1 Note	Series A	Series B
2	Unique identifier (eg CUSIP, ISIN, or Bloomberg identifier for private placement)	12544UAA9	12544UAB7
3	Governing law(s) of the instrument	Federal laws of Canada	Federal laws of Canada
Regulatory treatment			
4	Transitional Basel III rules	Additional Tier 1	Additional Tier 1
5	Post-transitional Basel III rules	Ineligible	Ineligible
6	Eligible at solo/group/group&solo	Group	Group
7	Instrument type (types to be specified by jurisdiction)	Innovative Tier 1	Innovative Tier 1
8	Amount recognised in regulatory capital (Currency ¹ in millions, as of most recent reporting date)	815	188
9	Par value of instrument	1,000	1,000
10	Accounting classification	Liability - amortised cost	Liability - amortised cost
11	Original date of issuance	March 13, 2009	March 13, 2009
12	Perpetual or dated	Dated	Dated
13	Original maturity date	June 30, 2108	June 30, 2108
14	Issuer call subject to prior supervisory approval	Yes	Yes
15	Optional call date, contingent call dates and redemption amount	June 30, 2014 at greater of Canada Yield Price and par	June 30, 2014 at greater of Canada Yield Price and par
16	Subsequent call dates, if applicable	Occurrence of Regulatory or Tax event, at par	Occurrence of Regulatory or Tax event, at par
Coupons/dividends			
17	Fixed or floating dividend/coupon	Fixed	Fixed
		9.976% until June 30, 2019. Thereafter resets every 5 years to five-year Government of Canada bond yield plus 10.425%	10.25% until June 30, 2019. Thereafter resets every 5 years to five-year Government of Canada bond yield plus 9.878%
18	Coupon rate and any related index	10.425%	9.878%
19	Existence of a dividend stopper	Yes	Yes
20	Fully discretionary, partially discretionary or mandatory	Fully discretionary	Fully discretionary
21	Existence of a step up or other incentive to redeem	Yes	Yes
22	Noncumulative or cumulative	Cumulative	Cumulative
23	Convertible or non-convertible	Convertible	Convertible
24	If convertible, conversion trigger (s)	Loss Absorption Event; see prospectus summary	Loss Absorption Event; see prospectus summary
25	If convertible, fully or partially	Fully	Fully
26	If convertible, conversion rate	Formula driven; refer to prospectus document	Formula driven; refer to prospectus document
27	If convertible, mandatory or optional conversion	Mandatory	Mandatory
28	If convertible, specify instrument type convertible into	Other	Other
29	If convertible, specify issuer of instrument it converts into	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce
30	Write-down feature	No	No
31	If write-down, write-down trigger (s)	n/a	n/a
32	If write-down, full or partial	n/a	n/a
33	If write-down, permanent or temporary	N/A	N/A
34	If temporary write-down, description of write-down mechanism	n/a	n/a
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Rank below deposit liabilities and other debt, including subordinated debt, but it is expected that Tier 1 Notes would be exchanged for newly issued CIBC Class A preferred shares prior to liquidation of CIBC	Rank below deposit liabilities and other debt, including subordinated debt, but it is expected that Tier 1 Notes would be exchanged for newly issued CIBC Class A preferred shares prior to liquidation of CIBC
36	Non-compliant transitioned features	Yes	Yes
37	If yes, specify non-compliant features	Not NVCC compliant	Not NVCC compliant

¹ All amounts in CAD unless otherwise indicated.

		Disclosure template for main features of regulatory capital instruments					
		Subordinated indebtedness					
		Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce
1	Issuer	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce
2	Unique identifier (eg CUSIP, ISIN, or Bloomberg identifier for private placement)	136069CV1	136069BJ9	136069AT8	136069AU5	136069BK6	136069BL4
3	Governing law(s) of the instrument	Federal laws of Canada	Federal laws of Canada	Federal laws of Canada	Federal laws of Canada	Federal laws of Canada	Federal laws of Canada
Regulatory treatment							
4	Transitional Basel III rules	Tier 2	Tier 2	Tier 2	Tier 2	Tier 2	Tier 2
5	Post-transitional Basel III rules	Ineligible	Ineligible	Ineligible	Ineligible	Ineligible	Ineligible
6	Eligible at solo/group/group&solo	Solo and Group	Solo and Group	Solo and Group	Solo and Group	Solo and Group	Solo and Group
7	Instrument type (types to be specified by jurisdiction)	Tier 2 Subordinated debt	Tier 2 Subordinated debt	Tier 2 Subordinated debt	Tier 2 Subordinated debt	Tier 2 Subordinated debt	Tier 2 Subordinated debt
8	Amount recognised in regulatory capital (Currency ¹ in millions, as of most recent reporting date)	599	39	182	135	41	42
9	Par value of instrument	1,000	1,000	1,000	100	1,000	1,000
10	Accounting classification	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost
11	Original date of issuance	June 6, 2008	May 29, 1996	January 7, 1991	May 15, 1991	May 29, 1996	May 29, 1996
12	Perpetual or dated	Dated	Dated	Dated	Dated	Dated	Dated
13	Original maturity date	June 6, 2023	May 25, 2029	January 7, 2031	May 15, 2031	May 25, 2032	May 25, 2033
14	Issuer call subject to prior supervisory approval	Yes	No	Yes	Yes	No	No
15	Optional call date, contingent call dates and redemption amount	Commencing June 6, 2008 at greater of Canada Yield Price and par	Not redeemable	Redeemable after January 7, 1996 at the higher of the Canada Yield Price and par	Redeemable on or after May 15, 2021 at the higher of the Canada Yield Price and par	Not redeemable	Not redeemable
16	Subsequent call dates, if applicable	From June 6, 2018 redeemable at par	n/a	n/a	n/a	n/a	n/a
Coupons/dividends							
17	Fixed or floating dividend/coupon	Fixed to floating	Fixed	Fixed	Fixed	Fixed	Fixed
18	Coupon rate and any related index	6.00%	8.70%	11.60%	10.80%	8.70%	8.70%
19	Existence of a dividend stopper	No	No	No	No	No	No
20	Fully discretionary, partially discretionary or mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
21	Existence of a step up or other incentive to redeem	Yes	Yes	Yes	Yes	Yes	Yes
22	Noncumulative or cumulative	Cumulative	Cumulative	Cumulative	Cumulative	Cumulative	Cumulative
23	Convertible or non-convertible	Non-convertible	Convertible	Non-convertible	Convertible	Convertible	Convertible
24	If convertible, conversion trigger (s)	n/a	On May 29, 2001 or any interest payment date thereafter upon notice from CIBC	n/a	On or after May 15, 1996 upon notice from CIBC	On May 29, 2001 or any interest payment date thereafter upon notice from CIBC	On May 29, 2001 or any interest payment date thereafter upon notice from CIBC
25	If convertible, fully or partially	n/a	Fully	n/a	Fully	Fully	Fully
26	If convertible, conversion rate	n/a	For an equal aggregate principal amount	n/a	For an equal aggregate principal amount	For an equal aggregate principal amount	For an equal aggregate principal amount
27	If convertible, mandatory or optional conversion	NA	Optional	NA	Optional	Optional	Optional
28	If convertible, specify instrument type convertible into	n/a	Other	n/a	Other	Other	Other
29	If convertible, specify issuer of instrument it converts into	n/a	CIBC	n/a	CIBC	CIBC	CIBC
30	Write-down feature	No	No	No	No	No	No
31	If write-down, write-down trigger (s)	n/a	n/a	n/a	n/a	n/a	n/a
32	If write-down, full or partial	n/a	n/a	n/a	n/a	n/a	n/a
33	If write-down, permanent or temporary	NA	NA	NA	NA	NA	NA
34	If temporary write-down, description of write-down mechanism	n/a	n/a	n/a	n/a	n/a	n/a
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Deposits	Deposits	Deposits	Deposits	Deposits	Deposits
36	Non-compliant transitioned features	Yes	Yes	Yes	Yes	Yes	Yes
37	If yes, specify non-compliant features	Not NVCC compliant	Not NVCC compliant	Not NVCC compliant	Not NVCC compliant	Not NVCC compliant	Not NVCC compliant

¹ All amounts in CAD unless otherwise indicated.

		Disclosure template for main features of regulatory capital instruments					
		Subordinated indebtedness					
		Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce
1	Issuer	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce
2	Unique identifier (eg CUSIP, ISIN, or Bloomberg identifier for private placement)	136069BM2	XS00105557121	GB0001703890	136069JJ1	136069LY5	136069YW5
3	Governing law(s) of the instrument	Federal laws of Canada	Federal laws of Canada	Federal laws of Canada	Federal laws of Canada	Federal laws of Canada	Federal laws of Canada
4	Regulatory treatment						
5	Transitional Basel III rules	Tier 2	Tier 2	Tier 2	Tier 2	Tier 2	Tier 2
6	Post-transitional Basel III rules	Ineligible	Ineligible	Ineligible	Tier 2	Tier 2	Tier 2
7	Eligible at solo/group/group&solo	Solo and Group	Solo and Group	Solo and Group	Solo and Group	Solo and Group	Solo and Group
8	Instrument type (types to be specified by jurisdiction)	Tier 2 Subordinated debt	Tier 2 Subordinated debt	Tier 2 Subordinated debt	Tier 2 Subordinated debt	Tier 2 Subordinated debt	Tier 2 Subordinated debt
8	Amount recognised in regulatory capital (Currency ¹ in millions, as of most recent reporting date)	43	85	22	983	957	1,467
9	Par value of instrument	1,000	US\$10,000, US\$250,000	US\$10,000, US\$100,000	1,000	1,000	1,000
10	Accounting classification	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost
11	Original date of issuance	May 29, 1996	July 24, 1985	August 15, 1986	October 28, 2014	January 26, 2016	April 4, 2018
12	Perpetual or dated	Dated	Dated	Dated	Dated	Dated	Dated
13	Original maturity date	May 25, 2035	July 31, 2084	August 31, 2085	October 28, 2024	January 26, 2026	April 4, 2028
14	Issuer call subject to prior supervisory approval	No	Yes	Yes	Yes	Yes	Yes
15	Optional call date, contingent call dates and redemption amount	Not redeemable	Redeemable at par July 27, 1990	Redeemable at par August 20, 1991	Redeemable from October 28, 2019 at par	Redeemable from January 26, 2021 at par	Redeemable from April 4, 2023 at par
16	Subsequent call dates, if applicable	n/a	Any interest payment date after July 27, 1990.	Any interest payment date after August 20, 1991.	n/a	n/a	n/a
17	Coupons/dividends						
18	Fixed or floating dividend/coupon	Fixed	Floating	Floating	Fixed/ Floating	Fixed/ Floating	Fixed/ Floating
19	Coupon rate and any related index	8.70%	Rate based on 6-month US\$LIBOR plus 0.25%, interest rate could be adjusted if the bank's dividend is less than \$0.52, and the difference paid in shares	Rate based on 6-month US\$LIBOR plus 0.125%, interest rate could be adjusted if the bank's dividend is less than \$0.27	3% per annum to October 28, 2019 & Three-month Banker's Acceptance Rate plus 1.19% thereafter until maturity	3.42% per annum to January 26, 2021 & Three-month Banker's Acceptance Rate plus 2.57% thereafter until maturity	3.45% per annum to April 4, 2023 & Three-month Banker's Acceptance Rate plus 1.00% thereafter until maturity
20	Existence of a dividend stopper	No	No	No	No	No	No
21	Fully discretionary, partially discretionary or mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
22	Existence of a step up or other incentive to redeem	Yes	No	No	No	No	No
23	Noncumulative or cumulative	Cumulative	Cumulative	Cumulative	Cumulative	Cumulative	Cumulative
24	Convertible or non-convertible	Convertible	Non-convertible	Non-convertible	Convertible	Convertible	Convertible
25	If convertible, conversion trigger (s)	On May 29, 2001 or any interest payment date thereafter upon notice from CIBC	n/a	n/a	Convertible: When a "Trigger Event" as defined by OSFI occurs	Convertible: When a "Trigger Event" as defined by OSFI occurs	Convertible: When a "Trigger Event" as defined by OSFI occurs
26	If convertible, fully or partially	Fully	n/a	n/a	Always converts fully on a conversion under a "Trigger Event"	Always converts fully on a conversion under a "Trigger Event"	Always converts fully on a conversion under a "Trigger Event"
27	If convertible, conversion rate	For an equal aggregate principal amount	n/a	n/a	Formula driven; refer to prospectus supplement	Formula driven; refer to prospectus supplement	Formula driven; refer to prospectus supplement
28	If convertible, mandatory or optional conversion	Optional	NA	NA	Mandatory	Mandatory	Mandatory
29	If convertible, specify instrument type convertible into	Other	n/a	n/a	Converts to Common Equity Tier 1	Converts to Common Equity Tier 1	Converts to Common Equity Tier 1
30	If convertible, specify issuer of instrument it converts into	CIBC	n/a	n/a	CIBC	CIBC	CIBC
31	Write-down feature	No	No	No	No	No	No
32	If write-down, write-down trigger (s)	n/a	n/a	n/a	n/a	n/a	n/a
33	If write-down, full or partial	n/a	n/a	n/a	n/a	n/a	n/a
34	If write-down, permanent or temporary	NA	NA	NA	n/a	n/a	n/a
35	If temporary write-down, description of write-down mechanism	n/a	n/a	n/a	n/a	n/a	n/a
36	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Deposits	Deposits	Deposits	Deposits	Deposits	Deposits
37	Non-compliant transitioned features	Yes	Yes	Yes	No	No	No
38	If yes, specify non-compliant features	Not NVCC compliant	Not NVCC compliant	Not NVCC compliant	n/a	n/a	n/a

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