



CANADIAN IMPERIAL BANK OF COMMERCE

US Resolution Plan

1. Public Section

December 21, 2018

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1. Public Section

INTRODUCTION

Canadian Imperial Bank of Commerce (“CIBC”) has developed a Resolution Plan covering its US operations (the “US Resolution Plan”) as required by the final rule (“Rule 165(d)”) issued by the Board of Governors of the Federal Reserve System (“Federal Reserve”) and the Federal Deposit Insurance Corporation (“FDIC”) pursuant to Section 165(d) of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank Act”). Rule 165(d) specifies that foreign banking organizations such as CIBC must submit a US Resolution Plan by December 31st of each year, beginning no later than December 31, 2013, that describes the strategy for the rapid and orderly resolution (as such term is defined in Rule 165(d)) of CIBC’s US operations in the event of CIBC’s material financial distress (as such term is defined in Rule 165(d)) or failure.

Unless otherwise indicated, information in this Public Summary is provided as at December 31, 2017.

CIBC is a leading Canadian-based financial institution with a market capitalization of \$39 billion and a Tier 1 capital ratio of 12.1%, as of October 31, 2017 (fiscal year-end). CIBC has four Strategic Business Units (SBUs): (1) Canadian Personal and Small Business Banking, which services personal and business clients across Canada; (2) Capital Markets, which services capital market customers globally; (3) Canadian Commercial Banking and Wealth Management, which delivers relationship-oriented commercial and private banking, as well as, wealth management services; and (4) US Commercial Banking and Wealth Management, which delivers commercial and wealth management products and services across the US.

CIBC strives to be a strong, innovative and relationship-oriented bank with sound risk management practices and responsible growth, creating enduring value for our stakeholders.

CIBC’s US activities fall within the US Commercial Banking and Wealth Management and Capital Markets business units and are principally undertaken through seven entities: (i) CIBC Bancorp USA Inc., a US bank holding company; (ii) CIBC Bank USA, an FDIC-insured depository institution; (iii) CIBC Inc., a commercial finance company; (iv) CIBC World Markets Corp., a registered broker-dealer; (v) the New York branch of CIBC (“CIBC NY Branch”); (vi) Atlantic Trust Company, National Association (ATNA), a limited-purpose national trust company; and (vii) AT Investment Advisers, Inc. (ATIA), a registered investment adviser.¹

CIBC’s US Commercial Banking and Wealth Management activities primarily include commercial lending, including commercial real estate, retail and private banking, investment management and administration, trustee services, and wealth strategies.

Globally, CIBC’s Capital Markets strategic business unit provides a wide range of credit, capital

¹ Subsequent to the December 31, 2017 effective date of this US Resolution Plan, Atlantic Trust Company, National Association and AT Investment Advisers, Inc. changed names to CIBC National Trust Company and CIBC Private Wealth Advisers, Inc., respectively.

markets, investment banking, and research products and services to government, institutional, corporate, and retail clients in Canada and in key markets around the world. In the US, CIBC's Capital Markets activities primarily include corporate lending, investment banking, and capital markets sales, dealing, and trading activities.

CIBC is supportive of the regulatory reform efforts implemented since the financial crisis to promote global financial stability and mitigate the systemic risks arising from the failure of any individual large financial institution. CIBC also supports the goal that financial institutions should be able to be resolved without taxpayer or US government support. CIBC has developed, and is committed to maintaining, a robust resolution planning process that is integrated with, and derives from, existing strategic, business, contingency, and recovery planning efforts.

In the unlikely event of material financial distress or failure, CIBC's US Resolution Plan demonstrates how its Material Entities (as such term is defined in Rule 165(d) and as designated below) and Core Business Lines (as such term is defined in Rule 165(d) and designated below) can be resolved in a rapid and orderly way under applicable insolvency regimes, without posing systemic risk to the larger financial system and without the need for any government or taxpayer support. CIBC has a limited footprint in the US and conducts no Critical Operations (as such term is defined in Rule 165(d)) and has no Core Business Lines whose failure or discontinuance would threaten the financial stability of the US.

A. MATERIAL ENTITIES

For the purposes of this US Resolution Plan, CIBC has identified seven Material Entities in the US. Rule 165(d) defines a “Material Entity” as an entity that is significant to the activities of a critical operation or Core Business Line. The Material Entities (“ME” or “MEs”) are:

Legal Entity	Legal Description	Primary Business Activities
CIBC Bancorp USA Inc.	A Delaware corporation and US bank holding company registered under the Bank Holding Company Act of 1956 and regulated by the Federal Reserve Bank of Chicago	A holding company which conducts business exclusively through its subsidiaries
CIBC Bank USA	Formerly The PrivateBank and Trust Company; subsequently rebranded as CIBC Bank USA. An Illinois-chartered, FDIC-insured bank headquartered in Chicago	Commercial banking, private wealth management, and retail and digital banking activities in the US
Atlantic Trust Company, National Association (ATNA)	A limited-purpose national trust company chartered by the Office of the Comptroller of the Currency (OCC), insured by the FDIC, and a member of the Federal Reserve System	Wealth strategies, investment management and administration, asset management services, custodial services, and fiduciary/trustee services
AT Investment Advisers, Inc. (ATIA)	An investment adviser, registered with the US Securities and Exchange Commission (SEC) (includes the former Geneva Advisors)	Investment advisory services
CIBC Inc.	A non-bank commercial finance company organized as a Delaware corporation, headquartered in New York. Licensed as a finance lender by the State of California’s Department of Business Oversight	Primarily Commercial Real Estate, with some legacy Corporate Banking exposure. Provides commercial mortgage financing to mid and large-cap sponsors including private and public real estate companies, investors, developers, and opportunity funds. Additionally, the business contributes fixed rate loans into Collateral Mortgage-Backed Securities pools
CIBC World Markets Corp. (or the broker-dealer)	A broker-dealer, registered with the US SEC and is a Financial Industry Regulatory Authority Inc. (FINRA) member firm. CIBC World Markets Corp. is also an introducing broker regulated by the Commodity Futures Trading Commission (CFTC) and the National Futures Association (NFA)	Primarily Investment Banking as well as Global Markets activities including the sale, dealing and trading of securities, and securities syndication and underwriting
CIBC NY Branch	A branch of CIBC licensed by the Superintendent of the New York State Department of Financial Services (NYDFS) as a non-insured New York branch of a foreign bank	In addition to Treasury funding activities such as wholesale funding issuance and repo, CIBC NY Branch provides Corporate Banking products and services to clients in energy, regulated utilities, project finance and infrastructure, and diversified industries

B. CORE BUSINESS LINES

For the purposes of Rule 165(d), “Core Business Lines” are those business lines of the covered company, including associated operations, services, functions, and support, that in the view of the covered company, upon failure, would result in a material loss of revenue, profit, or franchise value. For purposes of the US Resolution Plan, CIBC assessed its business lines in the US against its US operations as a whole to determine which are core in the US; however, none of the business lines in the US would be considered core to CIBC globally.

Within CIBC’s two strategic business units (“SBUs”) with US operations, CIBC operates four primary business lines, three of which are considered Core Business Lines (“CBLs”) in the US:

SBU	CBL	Secondary Lines of Business or Offerings	Activities
US Commercial Banking and Wealth Management	US Commercial Banking	<ul style="list-style-type: none"> Commercial Real Estate (CRE) National Commercial Banking Illinois Commercial Banking 	CRE consists of the middle market banking business within CIBC Bank USA as well as the institutional Real Estate Finance business conducted through CIBC Inc.
	US Wealth Management	<ul style="list-style-type: none"> Investment Management and Administration Trustee (Fiduciary) Services Wealth Strategies Private Banking Retail and Digital Banking 	Offerings include Retail and Digital Banking, Investment Management and Administration; Trustee (Fiduciary) Services; Wealth Strategies; and Private Banking.
Capital Markets	US Capital Markets	<ul style="list-style-type: none"> Global Markets Investment Banking Corporate Banking 	Global Markets refers to sales and trading (commodity, equity, debt, foreign exchange and rates), structured products, repo, and securities lending operations in the US conducted through CIBC NY Branch and CIBC World Markets Corp. CIBC’s US Investment Banking activities are conducted by CIBC World Markets Corp. Corporate Banking refers to CIBC’s corporate lending activities, conducted primarily through CIBC NY Branch.

Treasury activities and support groups within the US Region comprise a fourth CIBC business line in the US, known as Infrastructure and Other, which is part of the US Commercial Banking and Wealth Management SBU. Infrastructure and Other is not considered core to CIBC’s US operations.

C. SUMMARY FINANCIAL INFORMATION REGARDING ASSETS, LIABILITIES, CAPITAL AND MAJOR FUNDING SOURCES

1. Assets and Liabilities

Exhibit C-1 summarizes the consolidated balance sheet for CIBC in CAD\$.

Exhibit C-1: Consolidated Balance Sheet for CIBC

\$ millions, as at October 31	2017 ⁽¹⁾	2016
Assets		
Cash and deposits with banks	\$ 14,152	\$ 14,165
Securities		
Trading	50,679	49,915
AFS and held-to-maturity (HTM)	42,592	37,253
FVO	148	255
	93,419	87,423
Securities borrowed or purchased under resale agreements	45,418	33,810
Loans and acceptances		
Residential mortgages	207,271	187,298
Personal	40,937	38,041
Credit card	12,378	12,332
Business and government	106,590	83,801
Allowance for credit losses	(1,618)	(1,691)
	365,558	319,781
Derivative instruments	24,342	27,762
Other assets	22,375	18,416
	\$ 565,264	\$ 501,357
Liabilities and equity		
Deposits		
Personal	\$ 159,327	\$ 148,081
Business and government	225,622	190,240
Bank	13,789	17,842
Secured borrowings	40,968	39,484
	439,706	395,647
Obligations related to securities lent or sold short or under repurchase agreements	43,708	24,550
Derivative instruments	23,271	28,807
Acceptances	8,828	12,395
Other liabilities	15,305	12,919
Subordinated indebtedness	3,209	3,366
Equity	31,237	23,673
	\$ 565,264	\$ 501,357

(1) Includes the balances of CIBC Bank USA following the completion of the acquisition on June 23, 2017.

As discussed above, none of the business activities undertaken in the US are considered core to CIBC globally.

2. Capital

CIBC's objective is to employ a strong and efficient capital base. CIBC manages capital in accordance with policies established by its Board of Directors. These policies relate to capital strength, capital mix, dividends, return on capital, and the unconsolidated capital adequacy of regulated entities. Each policy has associated guidelines, and capital is monitored continuously for compliance.

Each year, a capital plan and three-year outlook are established, which encompass all the associated elements of capital: (i) forecasts of sources and uses; (ii) maturities; (iii) redemptions; (iv) new issuance; (v) corporate initiatives; and (vi) business growth. The capital plan is stress-tested in various ways to ensure that it is sufficiently robust under all reasonable scenarios. All of the elements of capital are monitored throughout the year, and the capital plan is adjusted as appropriate.

2.1. Regulatory Capital and Ratios

CIBC's minimum regulatory capital requirements are determined in accordance with guidelines issued by the Office of the Superintendent of Financial Institutions (OSFI) in Canada, which are based on the risk-based capital standards developed by the Basel Committee on Banking Supervision (BCBS).

CIBC and the other domestic systemically important banks (D-SIBs) in Canada are subject to a 1% Common Equity Tier 1 ("CET1") surcharge effective January 1, 2016. This results in all-in minimum targets for CET1, Tier 1 and Total capital ratios of 8.0%, 9.5%, and 11.5%, respectively. CIBC is considered to be a D-SIB in Canada along with the Bank of Montreal, the Bank of Nova Scotia, the National Bank of Canada, the Royal Bank of Canada, and Toronto Dominion.

"All-in" is defined by OSFI as capital calculated to include all of the regulatory adjustments that will be required by 2019, but retaining the phase-out rules for non-qualifying capital instruments. Certain deductions from CET1 capital are phased in at 20% per year from 2014. Amounts not yet deducted from capital under OSFI's transitional rules are risk weighted, creating a difference between risk-weighted assets (RWAs) on a transitional and all-in basis.

Exhibit C-2 presents information in CAD\$ relating to the components of CIBC's regulatory capital, based on Basel III.

Exhibit C-2: CIBC's Regulatory Capital

\$ millions, as at October 31	2017	2016
Common Equity Tier 1 (CET1) capital: instruments and reserves		
Directly issued qualifying common share capital plus related stock surplus	\$ 12,685	\$ 8,096
Retained earnings	16,101	13,584
AOCI (and other reserves)	452	790
Common share capital issued by subsidiaries and held by third parties (amount allowed in group CET1)	109	113
CET1 capital before regulatory adjustments	29,347	22,583
CET1 capital: regulatory adjustments		
Prudential valuation adjustments	62	69
Goodwill (net of related tax liabilities)	5,284	1,461
Other intangibles other than mortgage-servicing rights (net of related tax liabilities)	1,654	1,258
Deferred tax assets excluding those arising from temporary differences (net of related tax liabilities)	18	70
Defined benefit pension fund net assets (net of related tax liabilities)	160	156
Significant investments in the common stock of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions (amount above 10% threshold)	–	–
Other	551	421
Total regulatory adjustments to CET1 capital	7,729	3,435
CET1 capital	21,618	19,148
Additional Tier 1 (AT1) capital: instruments		
Directly issued qualifying AT1 instruments plus related stock surplus ⁽¹⁾	1,797	1,000
Directly issued capital instruments subject to phase out from AT1 ⁽²⁾	1,253	1,504
Additional Tier 1 Instruments issued by subsidiaries and held by third parties (amount allowed in AT1)	14	14
AT1 capital before regulatory adjustments	3,064	2,518
AT1 capital: regulatory adjustments		
Other deductions from Tier 1 capital as determined by OSFI	–	–
Total regulatory adjustments to AT1 capital	–	–
AT1 capital	3,064	2,518
Tier 1 capital (T1 = CET1 + AT1)	24,682	21,666
Tier 2 capital: instruments and provisions		
Directly issued qualifying Tier 2 instruments plus related stock surplus ⁽³⁾	1,961	2,001
Directly issued capital instruments subject to phase out from Tier 2	1,204	1,323
Tier 2 instruments issued by subsidiaries and held by third parties (amount allowed in Tier 2)	19	19
Collective allowances	263	74
Tier 2 capital before regulatory adjustments	3,447	3,417
Total regulatory adjustments to Tier 2 capital	–	–
Tier 2 capital (T2)	3,447	3,417
Total capital (TC = T1 + T2)	\$ 28,129	\$ 25,083
CET1 capital RWA⁽⁴⁾	\$ 203,321	\$ 168,996
Tier 1 capital RWA⁽⁴⁾	203,321	169,322
Total capital RWA⁽⁴⁾	203,321	169,601
Capital ratios		
CET1 ratio	10.6 %	11.3 %
Tier 1 capital ratio	12.1 %	12.8 %
Total capital ratio	13.8 %	14.8 %

- (1) Comprises non-cumulative Class A Preferred Shares Series 39, 41, 43 and 45 which are treated as non-viability contingent capital (NVCC) in accordance with OSFI's capital adequacy guidelines.
- (2) Comprises CIBC Tier 1 Notes - Series A and Series B due June 30, 2108 (together, the Tier 1 Notes).
- (3) Comprises Debentures due on October 28, 2024 and January 26, 2026 which are treated as NVCC in accordance with OSFI's capital adequacy guidelines.
- (4) All-in RWAs as at October 31, 2017 include a capital floor adjustment.

3. Funding sources

CIBC funds primarily through Canadian retail operations and US wealth management relationships, which provide stable and diversified funding channels. CIBC also maintains a strong wholesale funding base with funding centers in Toronto (CIBC), New York (CIBC NY Branch), London (CIBC, London Branch), Hong Kong (CIBC Hong Kong Branch), Singapore (CIBC Singapore Branch) and through broker-dealer operations in the same regions. CIBC utilizes asset securitization markets in Canada and the US to provide additional funding sources.

The Treasurer is responsible for overall liquidity risk management and funding execution. This includes term debt issuance and asset securitization (including covered bonds).

Governance and oversight of liquidity and funding activities takes place through CIBC's Asset and Liability Committee. Consistent with CIBC's liquidity risk mitigation strategies, CIBC continues to source term funding in the wholesale markets from a variety of clients and geographic locations, borrowing across a range of maturities, using a mix of funding instruments.

Strategies for managing liquidity risk include maintaining diversified sources of wholesale term funding, asset securitization initiatives, and maintenance of segregated pools of high quality liquid assets that can be sold or pledged as security to provide a ready source of liquidity. Collectively, these strategies result in lower dependency on short-term wholesale funding.

D. DESCRIPTION OF DERIVATIVE AND HEDGING ACTIVITIES

1. Derivatives Activities

CIBC uses derivative instruments for both asset/liability management (“ALM”) and trading purposes. The derivatives used for ALM purposes allow CIBC to manage financial risks, such as movements in interest and foreign exchange rates. Derivative trading activities are primarily driven by client trading activities and hedging activities in the interest rate, foreign exchange, debt, equity, and commodity markets.

The majority of CIBC’s derivative contracts are over-the-counter (“OTC”) transactions that are privately negotiated between CIBC and the counterparty to the contract. Some of the OTC transactions are novated to central clearing houses. CIBC also engages in derivatives trading in exchange-traded contracts transacted through organized and regulated exchanges which consist primarily of options and futures.

The principal derivatives used by CIBC in both OTC and exchange traded markets are as follows:

- Interest rate derivatives including forward rate agreements, interest rate swaps, interest rate options, and interest rate futures;
- Foreign exchange derivatives including foreign exchange forwards, foreign exchange futures, foreign exchange swaps, and cross-currency interest rate swaps;
- Exchange rate related contracts, including forward foreign exchange contracts, currency swaps, and options;
- Credit derivatives, principally credit default swaps and certain total return swaps, used by CIBC as part of its trading activity and to manage its own exposure to credit risk. CIBC also uses credit default swaps to securitize, in combination with external funding;
- Equity derivatives including equity swaps, equity options, and equity index futures; and
- Commodity forwards, futures, and options, such as precious metal and energy-related products.

2. Hedging Activities

Derivatives are used by CIBC to hedge risk and are not used for speculation. CIBC acts as the counterparty in all cases, and no client-facing derivatives positions are booked in the US with the exception of certain foreign exchange and interest rate derivatives booked in CIBC Bank USA. Derivatives positions booked in CIBC Bank USA are matched to offsetting positions to avoid carrying market risk.

All derivative instruments are recognized initially, and are measured subsequently, at fair value and are reported as assets where they have a positive fair value and as liabilities where

they have a negative fair value, in both cases as derivative instruments. The accounting for derivatives used for ALM purposes varies according to the nature of the instrument hedged and the type of hedge transactions.

E. MEMBERSHIPS IN MATERIAL PAYMENT, CLEARING, AND SETTLEMENT SYSTEMS

As an essential part of doing business, CIBC and the MEs participate in payment, clearing and settlement systems to conduct financial transactions in a global economy. CIBC reviewed the payment, clearing, and settlement systems used by the MEs to determine the material systems to be considered for resolution planning purposes. These are identified at Exhibit E-1 below.

Exhibit E-1: Payment, Clearing, and Settlement Systems

System Type	System Name	Member(s)	MEs	CBLs
Payment	Fedwire	CIBC Inc., CIBC World Markets Corp, CIBC NY Branch	All	All
	SWIFT	CIBC Inc., CIBC World Markets Corp, CIBC NY Branch	All	All
Clearing and Settlement	Depository Trust Clearing Corporation (DTCC)	CIBC World Markets Corp	CIBC World Markets Corp, CIBC NY Branch	US Capital Markets
	Euroclear	CIBC World Markets Corp	CIBC World Markets Corp	US Capital Markets
	Fixed Income Clearing Corporation (FICC)	CIBC World Markets Corp	CIBC World Markets Corp	US Capital Markets
	London Clearing House (LCH) Clearnet	CIBC NY Branch	CIBC NY Branch	US Capital Markets
	National Automated Clearing House Association	CIBC Bank USA	CIBC Bank USA	All
	National Securities Clearing Corporation	CIBC World Markets Corp	CIBC World Markets Corp	US Capital Markets
	FED Securities	CIBC World Markets Corp CIBC NY Branch	CIBC World Markets Corp, CIBC NY Branch	US Capital Markets
	Options Clearing Corporation	CIBC World Markets Corp	CIBC World Markets Corp	US Capital Markets

F. FOREIGN OPERATIONS

CIBC is a leading Canadian-based global financial institution. Through our four strategic business units — Canadian Personal and Small Business Banking, Canadian Commercial Banking and Wealth Management, US Commercial Banking and Wealth Management, and Capital Markets — CIBC provides a full range of financial products and services to 11 million individual, small business, commercial, corporate and institutional clients in Canada, the US and around the world.

CIBC's business unit operations are carried out through CIBC, chartered under the Bank Act (Canada), and its legal entities comprised of wholly-owned subsidiaries, controlled subsidiaries, joint-venture companies, and affiliates.

- Canadian Personal and Small Business Banking provides personal and small business clients across Canada with financial advice, products and services through a team of advisors in our banking centers, as well as through our direct, mobile and remote channels.
- Canadian Commercial Banking and Wealth Management provides high-touch, relationship-oriented commercial and private banking, as well as wealth management services to meet the needs of middle-market companies, entrepreneurs, high-net-worth individuals and families, along with institutional clients across Canada.
- US Commercial Banking and Wealth Management provides high-touch, relationship-oriented commercial, personal and small business banking, as well as wealth management services to meet the needs of middle-market companies, executives, entrepreneurs, high-net-worth individuals and families in the markets we serve in the US.
- Capital Markets provides integrated global markets products and services, investment banking advisory and execution, corporate banking and top-ranked research to corporate, government and institutional clients around the world.

CIBC has more than 44,000 employees dedicated to helping clients achieve what matters to them, delivering consistent and sustainable performance for its shareholders and giving back to its communities.

CIBC is a Canadian public company with securities listed on the Toronto Stock Exchange and the New York Stock Exchange. CIBC has in place a system of corporate governance practices that meets or exceeds all applicable regulatory requirements.

For further information on CIBC's global operations, please refer to CIBC's Annual Report.

G. MATERIAL SUPERVISORY AUTHORITIES

CIBC is subject to a significant body of laws and regulations that are a condition for authorization to conduct its banking and financial services business in each jurisdiction where it conducts operations. These requirements are largely prescribed on a jurisdictional basis by the applicable government, central bank, regulatory authorities, or other applicable bodies.

CIBC is regulated by OFSI. In light of its US operations, CIBC is treated as a financial holding company in the US. Accordingly, US operations fall within the broad prudential authority vested in the Federal Reserve, and its US activities are subject to the restrictions in the Bank Holding Company Act of 1956.

Details of the supervisory authorities for CIBC and its MEs are included at Exhibit G.1 below:

Exhibit G.1: Primary Regulators by Entity

Entity	Primary Regulatory Authority
CIBC	Office of the Superintendent of Financial Institutions
	Canada Deposit Insurance Corporation
CIBC Bancorp USA Inc.	Federal Reserve Bank of Chicago
CIBC Bank USA	Federal Deposit Insurance Corporation
Atlantic Trust Company, National Association	Office of the Comptroller of the Currency
	Federal Deposit Insurance Corporation
AT Investment Advisers, Inc.	Securities & Exchange Commission
CIBC Inc.	State of California's Department of Business Oversight
	Financial Industry Regulatory Authority Inc.
	Securities & Exchange Commission
CIBC World Markets Corp	National Futures Association
	Commodity Futures Trading Commission
CIBC NY Branch	New York State Department of Financial Services

H. PRINCIPAL OFFICERS

The tables below provide a list of principal officers and directors for CIBC and the principal officers for MEs as at December 31, 2017.

CIBC Board of Directors

Name	Position
Brent S. Belzberg	Non-Executive Director
Nanci Caldwell	Non-Executive Director
Michelle Collins	Non-Executive Director
Patrick Daniel	Non-Executive Director
Luc Desjardins	Non-Executive Director
Victor Dodig	President and Chief Executive Officer, CIBC
Linda Hasenfratz	Non-Executive Director
Kevin Kelly	Non-Executive Director
Christine Larsen	Non-Executive Director
Nicholas Le Pan	Non-Executive Director
Hon. John Manley	Non-Executive Director and Chair
Jane Peverett	Non-Executive Director
Katharine Stevenson	Non-Executive Director
Martine Turcotte	Non-Executive Director
Ronald Tysoe	Non-Executive Director
Barry Zubrow	Non-Executive Director

CIBC Executive Team

Name	Position
Victor Dodig	President and Chief Executive Officer, CIBC
Michael Capatides	Senior Executive Vice-President, Chief Administrative Officer and General Counsel
Harry Culham	Senior Executive Vice-President and Group Head, Capital Markets
Laura Dottori-Attanasio	Senior Executive Vice-President and Chief Risk Officer
Kevin Glass	Senior Executive Vice-President and Chief Financial Officer
Jon Hountalas	Senior Executive Vice-President and Group Head, Commercial Banking and Wealth Management, Canada
Deepak Khandelwal	Senior Executive Vice-President and Group Head, Client Connectivity and Innovation
Christina Kramer	Senior Executive Vice-President and Group Head, Personal and Small Business Banking, Canada
Kevin Patterson	Senior Executive Vice-President and Group Head, Technology and Operations
Larry Richman	Senior Executive Vice-President and Group Head, US Region; President and CEO, CIBC Bank USA
Sandy Sharman	Senior Executive Vice-President and Chief Human Resources and Communications Officer

CIBC Bancorp USA Inc. Officers

Officers	Position
Larry Richman	President & Chief Executive Officer
Brant Ahrens	Head of Retail & Digital Banking
Shawn Beber	Head of US Capital Markets
Karen Case	Head of US Commercial Real Estate
Jennifer Evans	General Counsel & Corporate Secretary, US Region
Bruce Hague	Head of National Commercial Banking & Regional Markets
Kevin Killips	Chief Financial Officer, US Region
Bruce Lubin	Head of Illinois Commercial & Specialty Banking
Jack Markwalter	Head of US Wealth Management
Kevin Van Solkema	Chief Risk Officer, US Region
Vicki Znavor	Chief Human Resources Officer
Robert Frentzel	Head of Specialized Industries
John Heiberger	Head of US Real Estate Finance
Julie O'Connor	Head of US Regulatory Affairs & Assistant Corporate Secretary
Jeff Steele	Head of Healthcare & Suburban Banking
Scott Wilson	Head of US Integration & Chief Operating Officer of US Wealth Management

CIBC Bank USA Officers

Officers	Position
Larry Richman	President and Chief Executive Officer
Kevin Killips	Executive Managing Director, Chief Financial Officer
Karen Case	Executive Managing Director, President of Commercial Real Estate
Bruce Hague	Executive Managing Director, President of National Commercial Banking and Regional Markets
Bruce Lubin	Executive Managing Director, President of Illinois Commercial Banking
Brant Ahrens	Executive Managing Director, President of Retail and Digital Banking
Jennifer Evans	Executive Managing Director, Chief Legal Officer and Corporate Secretary
Kevin Van Solkema	Executive Managing Director, Chief Risk Officer
Vicki Znavor	Executive Managing Director, Chief Human Resources Officer
John Markwalter	Executive Managing Director and Head of US Wealth Management
Paul Carey	Managing Director, Controller and Cashier
Robert Frentzel	Managing Director, President of Specialized Industries
John Heiberger	Managing Director, Head of US Real Estate Finance
Jeff Steele	Managing Director, President of Healthcare and Suburban Banking
Julie O'Connor	Managing Director, General Counsel & Head of US Regulatory Affairs
Scott Wilson	Managing Director, Chief Operating Officer of US Wealth Management

ATNA Officers

Officers	Position
John Markwalter, Jr.	Chairman and Chief Executive Officer
Dan Brown	Chief Financial Officer
Kenneth Kozanda	Chief Administrative Officer
Dave Donabedian	Chief Investment Officer
Gabrielle Bailey	Chief Fiduciary Officer
David Bruyea	Information Security Officer
Wayne DeWitt, Jr.	Secretary and General Counsel
Clint Ward	Chief Compliance Officer
Tharani Noorddin	BSA / AML Officer
Gregory Campbell	Assistant Secretary
Maria Torres	Assistant Secretary

ATIA Officers

Officers	Position
John Markwalter, Jr.	Chairman and Chief Executive Officer
Eric Propper	President
Robert McNeill	Executive Vice President
Marc Keller	Executive Vice President
Dan Brown	Chief Financial Officer, Treasurer
Dave Donabedian	Chief Investment Officer
Lisa Garcia	Chief Risk Officer
Clint Ward	Chief Compliance Officer/AML Officer
Kenneth Kozanda	Chief Administrative Officer
Gregory Campbell	Secretary and General Counsel
Gabrielle Bailey	Chief Fiduciary Officer
Wayne DeWitt, Jr.	Assistant Secretary
Maria Torres	Assistant Secretary

CIBC Inc. Officers

Officers	Position
Paul Carey	President
Daniel Brown	Managing Director and Chief Financial Officer
Stephen Wade	Managing Director and Deputy Chief Risk Officer
Achilles Perry	Managing Director
Sal Vicarisi	Managing Director
John Lindenthal	Managing Director
Keith Oglesbee	Managing Director
Barry Schumacher	Managing Director
Todd Roth	Managing Director
Dominic Sorresso	Managing Director
Mimi Cheng	Managing Director
Joseph Cervelli	Executive Director
Lawrence Kelty	Executive Director
Robert Casey	Executive Director
Michael Gewirtz	Executive Director
Maria Torres	Secretary

CIBC World Markets Corp. Officers

Officers	Position
Shawn Beber	President and Chief Executive Officer
Jeffrey Thibeault	Managing Director and Chief Compliance Officer
Dan Brown	Managing Director and Chief Financial Officer
Stephen Wade	Managing Director and Deputy Chief Risk Officer
Peter Maiorano	Treasurer
Michael Zellermyer	Chief Operations Officer and Executive Director
Achilles Perry	Managing Director and General Counsel
Maria Torres	Secretary

CIBC NY Branch Officers

Officers	Position
Michael Capatides	Senior Executive Vice President
Achilles Perry	Vice President and Branch Manager
Dan Brown	Vice President
Dan Feldman	Vice President
Jeffrey Thibeault	Vice President
Salvatore Vicarisi Sr.	Vice President

I. RESOLUTION PLANNING CORPORATE GOVERNANCE STRUCTURE AND PROCESSES

CIBC's US Resolution Plan has been developed in conjunction with senior management, various internal governance committees, and subject matter experts across CIBC. Governing and oversight bodies consist of the following groups and individuals:

- US Resolution Planning Executive Steering Committee ("ESC"): CIBC's Board of Directors has delegated the authority to approve the US Resolution Plan and any subsequent updates to the ESC, which is chaired by the US Chief Risk Officer ("US CRO") and comprises US Region senior management: the Chief Financial Officer, and General Counsel and Corporate Secretary, as well as CIBC's global SVP, Head of Enterprise Risk & Reporting. The ESC reviewed and approved this US Resolution Plan (and will do the same for subsequent updates).
- Senior Management Officials: The US CRO has overall responsibility for overseeing the development, maintenance, implementation, and filing of CIBC's US Resolution Plan. The US CRO is responsible for presenting the US Resolution Plan to the ESC for its review and approval. Additionally, a summary of the US Resolution Plan was reviewed by CIBC's global Recovery and Resolution Governance Committee (RRGC, see below) and the US Region Management Risk Committee, which is the senior-most risk oversight management committee in the US.
- Recovery and Resolution Governance Committee ("RRGC"): The RRGC is a sub-committee of the Global Risk Committee, responsible for the CIBC-wide oversight of the Recovery and Resolution Plans and supporting processes and practices at the group and regional levels. It is the primary point of senior management discussion for recovery and resolution activities.

Following the development and preparation of the 2018 US Resolution Plan, it was reviewed and approved by the ESC on December 18, 2018, prior to submission to FDIC and the Federal Reserve (collectively, the "Agencies").

In addition, US Legal continues to review any significant changes to CIBC's operations that could be expected to materially affect a resolution plan and, following approval from the ESC, would submit a notice of such development to the Agencies within 45 days of such change in circumstance. Such change in circumstance would be addressed in a subsequent resolution plan, when applicable, unless otherwise directed by the Agencies. A resolution plan would also be updated with any feedback obtained following submission.

J. MATERIAL MANAGEMENT INFORMATION SYSTEMS

CIBC has developed robust operational and management information systems to monitor the financial health and risk, and support the operations, of its global operations. Management information systems generally take the form of platform technologies and user interfaces that enable business users to perform analytics and extract data to generate standard and ad hoc reporting.

All key systems and applications, including systems and applications for finance, risk management, capital markets trading, operations, and human resources reporting, whether supported internally and/or outsourced to a third-party, operate to established business requirements for functionality, capacity, and availability. "Recovery Time Objectives" for service continuity are established and defined. These components, along with established incident, problem and change management controls, ensure that disruptions are minimized and impacts can be dealt with in a timely manner.

The management information systems are used extensively on a daily to monthly basis to provide senior management and the regulators with risk management, liquidity, accounting, operations, and financial reports detailing a broad range of information necessary to maintain the financial health and operations of CIBC's US businesses, including the MEs and Core Business Lines.

The management information systems and reports used by management to conduct business as usual operations, in addition to certain bespoke management information, have been used to support the development of the Resolution Plan.

CIBC maintains a number of policies governing the information technology control environment. The provision and management of information technology for operations outside of CIBC Bank USA is centralized in CIBC within the Technology and Operations business unit, and CIBC Bank USA maintains its own Services unit to manage any information technology infrastructure not yet integrated with CIBC. These units are responsible for technology solution development, implementation and maintenance of business applications and providing stable and reliable delivery of computer operations and networks that CIBC uses to run its businesses.

K. DESCRIPTION OF RESOLUTION STRATEGY

As described above, CIBC conducts no Critical Operations in the United States and has no Core Business Lines whose failure or discontinuance would pose a threat to the financial stability of the US.

If CIBC were resolved on a worldwide basis, we expect CIBC at the group level would be resolved pursuant to a single point of entry resolution strategy (Group Resolution Strategy). Under the Group Resolution Strategy, CIBC would be recapitalized through the implementation of the bail-in mechanism as described in the CIBC Global Resolution Plan, which would recapitalize and otherwise keep CIBC's subsidiaries and branches, including the MEs, open and operating outside their own bankruptcy or resolution proceedings. CIBC believes that the Group Resolution Strategy would be the most effective way to resolve all of CIBC, including the MEs.

Unlike the Group Resolution Strategy, and consistent with regulatory expectations for US resolution planning, the US Resolution Plan provides for the rapid and orderly resolution of the MEs separate from the rest of CIBC under the assumption that CIBC would be unwilling or unable to recapitalize the MEs and otherwise keep them out of their own resolution proceedings.

A hypothetical idiosyncratic scenario was developed upon which to base the US resolution strategy where CIBC's US operations experience a material financial distress event that leads to severe financial stress to all MEs and ultimately requires MEs to be resolved through their respective bankruptcy or receivership regimes as follows:

Material Entity	Resolution Strategy
CIBC Bancorp USA Inc.	Reorganization under Chapter 11 of the US Bankruptcy Code
CIBC Inc.	Reorganization under Chapter 11 of the US Bankruptcy Code
CIBC World Markets Corp	Resolution under the provisions of Securities Investor Protection Act of 1970
AT Investment Advisers, Inc.	Reorganization under Chapter 11 of the US Bankruptcy Code
CIBC Bank USA	FDIC Receivership under the Federal Deposit Insurance Act (FDIA)
Atlantic Trust Company, National Association	FDIC Receivership under the FDIA
CIBC NY Branch	Receivership by the Superintendent of the NYDFS, pursuant to the New York Banking Law (NYBL)

As required by Rule 165(d), CIBC took into account both the prescribed key impediments to a rapid and orderly liquidation and that such material financial distress or failure might occur under the baseline, adverse and severely adverse economic conditions provided by the Federal Reserve pursuant to Rule 165(d). Because of the limited operations of CIBC in the US and the

existence of the resolution regimes for its MEs, it is expected that—in all three sets of economic conditions provided by the Federal Reserve—the discontinuation of these MEs would proceed in an orderly fashion and would not have an adverse effect on the financial stability of the US.