

CIBC Bank USA

Insured Depository Institution (IDI) Resolution Plan



Public Section
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I. EXECUTIVE SUMMARY

The Federal Deposit Insurance Corporation's (FDIC) resolution planning rule (12 CFR § 360.10 (IDI Rule)) requires the submission of resolution plans by insured depository institutions (IDIs) with \$100 billion or more in total assets and informational filings by covered IDIs (CIDI) with at least \$50 billion but less than \$100 billion in total assets.

This Public Section provides an overview of CIBC Bank USA (the CIDI), an Illinois-chartered, Federal Reserve member bank headquartered in Chicago, Illinois, whose deposits are insured by the FDIC. The CIDI had \$61.5 billion in total assets and \$49.4 billion in deposits as of December 31, 2024. The CIDI is primarily a commercial-focused bank with a limited retail branch network.

The CIDI is a direct, wholly owned bank subsidiary of CIBC Bancorp USA Inc. (Bancorp USA), a Delaware corporation and US financial holding company registered under the Bank Holding Company Act of 1956. Through the CIDI and its other US operating subsidiaries (primarily a limited purpose national trust company, a US registered investment advisor, and a US broker-dealer), Bancorp USA is engaged in commercial banking, personal and digital banking, wealth management, and capital markets businesses. Bancorp USA had \$77.5 billion in total assets as of December 31, 2024.

The CIDI is an indirect, wholly owned subsidiary of Canadian Imperial Bank of Commerce, a bank chartered under the Bank Act (Canada) (which we refer to herein, collectively with its subsidiaries, as CIBC and, individually, as Parent Bank). CIBC is a leading and well-diversified North American financial services organization headquartered in Toronto, Canada, with more than 48,000 employees and operations in Canada, the United States, and other regions globally. CIBC had CAD\$1,042 billion in total assets and CAD\$59 billion in stockholders' equity as of October 31, 2024, the end of its most recent fiscal year. CIBC is a Canadian public company whose securities are listed on the Toronto Stock Exchange and the New York Stock Exchange under the ticker "CM."

CIBC's business operations are carried out through Parent Bank and its subsidiaries, including Bancorp USA, joint ventures, and other affiliates. For management and reporting purposes, CIBC's businesses are organized into the following four strategic business units (SBUs).

- **Canadian Personal and Business Banking** provides personal and business clients across Canada with financial advice, services, and solutions through banking centers, as well as mobile and online channels.
- **Canadian Commercial Banking and Wealth Management** provides banking and wealth management services to middle-market companies, entrepreneurs, high-

net-worth individuals, and families across Canada, as well as asset management services to institutional investors.

- **Capital Markets and Direct Financial Services** provides integrated global markets products and services, investment banking and corporate banking solutions, and research to clients around the world, and leverages CIBC's digital capabilities to provide a cohesive set of direct banking, direct investing, and multicurrency payment solutions for clients.
- **US Commercial and Wealth Management** provides banking and wealth management solutions across the US, focusing on middle-market and mid-corporate companies, entrepreneurs, high-net-worth individuals, and families, as well as operating personal and small business banking services in six US markets.

Substantially all of the CIDI's business operations are managed and reported as part of CIBC's US Commercial and Wealth Management SBU.

Dodd-Frank Act Title I Resolution Plan and Global CIBC Resolution Strategy

As part of its overall resolution planning activities, under Title I, Section 165(d) of the Dodd-Frank Wall Street Reform and Consumer Protection Act (DFA), CIBC, as a foreign banking organization, is required to develop and maintain a strategy for the rapid and orderly resolution of its US operations in the event of CIBC's material financial distress or failure. For purposes of the DFA Title I Resolution Plan requirements, CIBC is a triennial reduced filer and most recently filed its resolution plan for its US operations to the Federal Reserve and FDIC in June 2025.

CIBC's Title I Resolution Plan describes how it would stabilize, or wind down in an orderly manner, under applicable insolvency regimes, CIBC's combined US operations (including the CIDI) in the event it experiences material financial distress. The Title I Resolution Plan demonstrates that CIBC's US operations could be resolved without posing systemic risk to the broader financial system and without any extraordinary government assistance or taxpayer support. As stated in its most recent DFA Title I Resolution Plan, CIBC has a limited footprint in the US banking industry, conducts no critical operations (as defined in the resolution plan regulations), and has no core business lines whose failure, or discontinuance would threaten the financial stability of the US.

Additionally, CIBC's global resolution exit approach employs a Single Point of Entry (SPOE) resolution strategy. Under the SPOE resolution strategy, if CIBC were to be resolved on a global basis, CIBC would be recapitalized through the implementation of bail-in mechanisms, which would recapitalize and otherwise keep CIBC's material legal entities, including the CIDI, open and operational outside their own bankruptcy or resolution proceedings until the CIDI can be successfully divested.

However, pursuant to the IDI Rule, the CIDI is required to provide information relevant to the unlikely event that CIBC would be unwilling or unable to recapitalize its material legal entities, including the CIDI, and otherwise keep them out of their own resolution proceedings. Accordingly, this 2025 IDI Resolution Informational Filing (IDI Plan) contains information relevant to the CIDI's resolution that will support the development of strategic options for its resolution by the FDIC.

Background on the CIDI's Organizational History and Structure

Prior to 2017, the CIDI was known as The PrivateBank and Trust Company, a wholly owned subsidiary of PrivateBancorp, Inc., a publicly traded, single bank holding company headquartered in Chicago, Illinois. CIBC completed its acquisition of PrivateBancorp, Inc. in June 2017 through the merger of PrivateBancorp, Inc. with and into Bancorp USA and subsequently changed the institution's name to CIBC Bank USA. This transaction is referred to as the "CIBC Acquisition." As a result of the CIBC Acquisition, the CIDI became an indirect, wholly owned subsidiary of CIBC and joined the CIBC organization. Since the completion of the CIBC Acquisition, there has been substantial work undertaken to integrate the CIDI into the broader CIBC organization in areas including, but not limited to, branding and marketing, human resources and benefit plans, risk management, core technology systems, corporate real estate, and global policies and procedures. Therefore, there are certain critical services provided by Parent Bank or other CIBC affiliates upon which the CIDI relies to conduct its businesses and manage core operations.

The critical operating and transactional platforms of the CIDI are largely independent, as many of the pre-CIBC Acquisition operating models, transactional systems, and management information systems continue to be used by the CIDI. A majority of US-based personnel, including substantially all client-facing employees in the core business lines of the CIDI, as well as infrastructure group employees (e.g., risk management, finance, technology & operations, legal, etc.) that provide meaningful support services to the CIDI (among other US legal entities), are directly employed by the CIDI.

This limited interconnectivity with the broader CIBC organization in certain key areas would make the separation of the CIDI from Parent Bank in the event of resolution less complex than may be the case for other IDIs that rely more extensively on intercompany services and/or intercompany funding from its parent company, including those that are foreign based.

II. IDENTIFICATION OF MATERIAL ENTITIES

The CIDI provides relationship-oriented commercial, personal, and digital banking to meet the needs of middle-market and mid-corporate companies, entrepreneurs, high-net-worth individuals, and families in the markets it serves in the US. As a commercial-focused bank, the CIDI has a limited retail branch network, which is located primarily in the Chicago metropolitan area, with additional branches in the St. Louis, Missouri; Milwaukee, Wisconsin; and Detroit, Michigan metropolitan areas; as well as in San Francisco, California; and Palm Beach, Florida. The CIDI also has non-branch commercial banking offices located in major commercial centers in the US.

The CIDI does not have any material operating subsidiaries. Its only subsidiaries serve as special purpose asset holding entities established for legal, tax, or other such purposes. None of these subsidiaries constitute a “regulated subsidiary” as defined in the IDI Rule. Additionally, the CIDI does not have any foreign branches.

The IDI Rule defines a material entity as “[a] company, a domestic branch, or a foreign branch as defined in 12 U.S.C. 1813(o), that is significant to the activities of a critical service or core business line and includes all IDIs that are subsidiaries or affiliates of the CIDI”. The following entities are designated as material entities for purposes of the IDI Plan.

Exhibit II.1.: Material Entities of the CIDI

Material Entity	Rationale
CIBC Parent Bank	Provides meaningful operational support to the CIDI (e.g., houses key employees, is a licensor of key systems and applications, provides important affiliate services via service level agreements, holds contracts with key PCS providers)
CIBC Bank USA	Is highly interconnected with a core business line
CIBC National Trust Company (CNTC)	Is both a CIDI affiliate and an FDIC-insured depository institution

III. DESCRIPTION OF CORE BUSINESS LINES

Under the IDI Rule, core business lines are defined as “those business lines of the CIDI, including associated operations, services, functions and support that, in the view of the CIDI, upon failure would result in a material loss of revenue, profit or franchise value.” The following core business lines have been identified for purposes of the IDI Plan: (1) Commercial Banking (inclusive of Commercial Real Estate); and (2) Private, Personal, and Digital Banking (PP&DB), a component within the US Wealth Management business.

Commercial Banking

Commercial Banking operates primarily through the CIDI and, to a significantly lesser extent, its direct, wholly owned subsidiary CIBC Equipment Finance USA LLC (for equipment leasing transactions). This core business line offers loan and credit-related, deposit and treasury management products and services to middle-market and mid-corporate commercial clients in various industry segments, including Specialized Industries, Asset-Based Lending, Middle Market Banking, Structured Finance and Financial Institutions, Business Banking, Regional Commercial Banking, Mid-Corporate Banking, and Commercial Real Estate.

Private, Personal and Digital Banking (PP&DB)

PP&DB within the US Wealth Management business operates exclusively through the CIDI. PP&DB offers loan and credit-related and deposit products and services to high-net-worth individuals and families who are Private Wealth Management clients, as well as to retail clients through CIBC Bank USA's branch network and digital channels.

The strategic importance of these two core business lines is underscored by their material contribution to the CIDI's financial health. Moreover, Commercial Banking and PP&DB (along with the investment securities held by the CIDI) comprise a substantial majority of the CIDI's total assets, total loans, total deposits, and total liabilities.

IV. SUMMARY FINANCIAL INFORMATION

Exhibits IV.1 and IV.2 below provide summary financial information for CIBC.

Exhibit IV.1: Consolidated Balance Sheet for CIBC

Millions of Canadian dollars, as at October 31	2024	2023 ⁽¹⁾
ASSETS		
Cash and non-interest-bearing deposits with banks	\$ 8,565	\$ 20,816
Interest-bearing deposits with banks	39,499	34,902
Securities (Note 4)	254,345	211,348
Cash collateral on securities borrowed	17,028	14,651
Securities purchased under resale agreements	83,721	80,184
Loans (Note 5)		
Residential mortgages	280,672	274,244
Personal	46,681	45,587
Credit card	20,551	18,538
Business and government	214,299	194,870
Allowance for credit losses	(3,917)	(3,902)
	558,286	529,337
Other		
Derivative instruments (Note 12)	36,435	33,243
Customers' liability under acceptances	6	10,816
Property and equipment (Note 7)	3,359	3,251
Goodwill (Note 8)	5,443	5,425
Software and other intangible assets (Note 8)	2,830	2,742
Investments in equity-accounted associates and joint ventures (Note 24)	785	669
Deferred tax assets (Note 18)	821	647
Other assets (Note 9)	30,862	27,659
	80,541	84,452
	\$ 1,041,985	\$ 975,690
LIABILITIES AND EQUITY		
Deposits (Note 10)		
Personal	\$ 252,894	\$ 239,035
Business and government	435,499	412,561
Bank	20,009	22,296
Secured borrowings	56,455	49,484
	764,857	723,376
Obligations related to securities sold short	21,642	18,666
Cash collateral on securities lent	7,997	8,081
Obligations related to securities sold under repurchase agreements	110,153	87,118
Other		
Derivative instruments (Note 12)	40,654	41,290
Acceptances	6	10,820
Deferred tax liabilities (Note 18)	49	40
Other liabilities (Note 11)	30,155	26,653
	70,864	78,803
Subordinated indebtedness (Note 14)	7,465	6,483
Equity		
Preferred shares and other equity instruments (Note 15)	4,946	4,925
Common shares (Note 15)	17,011	16,082
Contributed surplus	159	109
Retained earnings	33,471	30,352
Accumulated other comprehensive income (AOCI)	3,148	1,463
Total shareholders' equity	58,735	52,931
Non-controlling interests	272	232
Total equity	59,007	53,163
	\$ 1,041,985	\$ 975,690

(1) Certain comparative amounts have been restated to reflect the adoption of IFRS 17 "Insurance Contracts" (IFRS 17) in the first quarter of 2024. See Note 1 to the consolidated financial statements for additional details.

Exhibit IV.2: CIBC's Regulatory Capital

\$ millions, as at October 31	2024	2023
Common Equity Tier 1 (CET1) capital: instruments and reserves		
Directly issued qualifying common share capital plus related stock surplus	\$ 17,170	\$ 16,191
Retained earnings	33,471	30,402
AOCI (and other reserves)	3,148	1,463
Common share capital issued by subsidiaries and held by third parties (amount allowed in group CET1)	119	102
CET1 capital before regulatory adjustments	53,908	48,158
CET1 capital: regulatory adjustments		
Prudential valuation adjustments	4	5
Goodwill (net of related tax liabilities)	5,360	5,344
Other intangibles other than mortgage-servicing rights (net of related tax liabilities)	2,456	2,384
Deferred tax assets excluding those arising from temporary differences (net of related tax liabilities)	15	9
Defined benefit pension fund net assets (net of related tax liabilities)	1,045	793
Other	512	(704)
Total regulatory adjustments to CET1 capital	9,392	7,831
CET1 capital	44,516	40,327
Additional Tier 1 (AT1) capital: instruments		
Directly issued qualifying AT1 instruments plus related stock surplus ⁽¹⁾	4,946	4,925
AT1 instruments issued by subsidiaries and held by third parties (amount allowed in AT1)	19	18
AT1 capital	4,965	4,943
Tier 1 capital (T1 = CET1 + AT1)	49,481	45,270
Tier 2 capital: instruments and provisions		
Directly issued qualifying Tier 2 instruments plus related stock surplus ⁽²⁾	6,920	5,888
Tier 2 instruments issued by subsidiaries and held by third parties (amount allowed in Tier 2)	17	23
General allowances	391	938
Tier 2 capital (T2)	7,328	6,849
Total capital (TC = T1 + T2)	\$ 56,809	\$ 52,119
RWA consisting of:		
Credit risk	\$ 274,503	\$ 274,714
Market risk	12,188	8,004
Operational risk	46,811	43,402
Total RWA	\$ 333,502	\$ 326,120
Capital ratios		
CET1 ratio	13.3 %	12.4 %
Tier 1 capital ratio	14.8 %	13.9 %
Total capital ratio	17.0 %	16.0 %
Leverage ratios		
Leverage ratio exposure	\$ 1,155,432	\$ 1,079,103
Leverage ratio	4.3 %	4.2 %
TLAC ratio and TLAC leverage ratio		
TLAC available	\$ 101,062	\$ 100,176
TLAC ratio	30.3 %	30.7 %
TLAC leverage ratio	8.7 %	9.3 %

(1) Comprised of non-viability contingent capital (NVCC) preferred shares and Limited Recourse Capital Notes (LRCNs).

Funding Sources

The CIDI is funded mainly with client deposits and equity capital from Parent Bank and Bancorp USA through retained earnings and does not rely significantly on other short- or long-term wholesale funding sources. A significant majority of the CIDI's total liabilities are comprised of deposits.

As a commercial-focused bank with a limited traditional branch network, the CIDI does not have a significant amount of retail deposits, but it has substantial amounts of commercial operating deposits, which function as a stable source of liquidity, as they are generated from clients that maintain operating treasury management services with the CIDI.

Other key sources or types of deposits for the CIDI include the following:

- **Interest-bearing money market accounts** – Client balances, predominantly from commercial clients, in excess of operating needs, are regularly held in these accounts at negotiated rates of interest.

- ***Omnibus deposit accounts*** – Omnibus accounts are deposit accounts where a custodian holds funds on behalf of multiple individuals or entities. FDIC insurance may “pass through” to the individual or entity beneficiaries, provided certain requirements are met and subject to overall insured deposit limits and rules.
- ***Sweep deposit accounts*** – The CIDI participates in sweep deposit programs with third-party broker-dealers and a bank sweep deposit program with its asset management affiliate, CIBC National Trust Company.
- ***Traditional time deposits*** – Certificates of Deposit (CD) with a specific term and a fixed interest rate, consisting of both brokered and non-brokered client accounts.
- ***Savings and CDs through our CIBC Agility Digital Banking platform*** – CIBC Bank USA offers high-interest savings accounts and CDs exclusively through its digital banking platform called “CIBC Agility.”

V. DESCRIPTION OF DERIVATIVE AND HEDGING ACTIVITIES

The CIDI engages in various derivative instruments to both hedge balance sheet risks and to facilitate client transactions. The majority of the CIDI's derivatives' notional balances are interest rate swaps to hedge the CIDI's structural interest rate risk by reducing variability in the forecasted interest cash flows attributable to changes in the contractually specified interest rates.

Additionally, the CIDI's Commercial Banking business provides clients with interest rate risk management solutions to protect against rate volatility, as well as foreign exchange and commodity derivative solutions. The CIDI's PP&DB business also provides clients with interest rate derivatives to manage rate exposure in their investment portfolios.

Derivative transactions involving the CIDI's clients generally are transacted through and booked at other entities within the CIBC organization, such as Parent Bank and CIBC's US broker-dealer. Some clients transact directly with the CIDI when executing an interest-rate derivative; in such cases, however, the CIDI engages in back-to-back transactions with off-setting hedges booked either with Parent Bank (or other CIBC affiliates) or external counterparties.

The majority of the CIDI's derivatives portfolio is comprised of standard interest rate swaps, with the remainder comprised of limited amount of credit derivatives, foreign exchange derivatives, and equity derivatives.

The CIDI uses a comprehensive risk management framework to monitor and manage interest rate exposure continuously. The CIDI engages in back-to-back transactions with off-setting hedges booked either with external counterparties or desks within parent company affiliates to neutralize the risk associated with the original derivatives transactions entered into with clients. CIBC Bank USA leverages dynamic hedging techniques to manage its interest rate position risk by adjusting hedges in response to changing market conditions. This ensures that risk is effectively managed.

VI. MATERIAL PAYMENT, CLEARING AND SETTLEMENT SYSTEMS

The CIDI participates with the following providers of payment, clearing, and settlement services and agent banks to facilitate the clearing and settlement of client cash, securities, and derivative transactions.

Exhibit VI.1: Payment, Clearing, and Settlement Providers

PCS Provider	Provider Name	Description
Payments	FedACH Services	FedACH Services is one of two automated clearing house operators for US ACH payments that route and settle ACH transactions between financial institutions and is owned by the Federal Reserve.
Payments	Fedwire Funds Service	The Fedwire Funds Service, operated by the Federal Reserve, is a real-time, gross settlement system that processes electronic funds transfers, including the settlement of cross-border USD commercial transactions, the purchase and sale of federal funds, and the financing of securities transactions.
Payments	The Society for Worldwide Interbank Financial Telecommunication (SWIFT)	SWIFT provides a global messaging network enabling the ability to communicate both US and cross-border payment instructions and provides additional messaging interfaces for queries to facilitate payment infrastructures.
Settlement	Fedwire Securities Service	Fedwire Securities Service is a national securities book entry system owned and operated by the Federal Reserve Banks which conducts real-time transfers of securities and related funds, on a gross basis.
Agent Bank	US Bank	The CIDI currently engages US Bank for securities settlements as a primary custodian.

VII. DESCRIPTION OF FOREIGN OPERATIONS

Though CIBC Bank USA is part of a large, foreign banking organization, the CIDI itself does not have any foreign branches. The CIDI does rely on intercompany services provided by foreign affiliates, primarily Parent Bank, and a limited number of key personnel for the CIDI are located in Canada.

VIII. MATERIAL SUPERVISORY AUTHORITIES

The CIDI is supervised and regulated by the Federal Reserve, the Illinois Department of Financial and Professional Regulation, and, with respect to certain matters, by the FDIC. The principal regulators of Parent Bank are the Office of the Superintendent of Financial Institutions (Canada), the Canada Deposit Insurance Corporation, and the Federal Reserve.

The principal regulator of CNTC, the other identified material entity for purposes of the IDI Rule, is the Office of the Comptroller of the Currency and, with respect to certain matters, the FDIC.

IX. CIBC BANK USA PRINCIPAL OFFICERS

The executive officers of the CIDI are as follows:

Exhibit IX.1: Principal Officers of CIBC Bank USA

Name	Position
Shawn Beber	Chief Executive Officer & President
C. Brant Ahrens	Executive Managing Director and Chief Administrative Officer
Jacqueline Barlow	Executive Managing Director and President, Commercial Real Estate
Paul E. Carey	Executive Managing Director and Chief Financial Officer
Richard Dalton	Executive Managing Director and Chief Risk Officer
Brad Fedosoff	Executive Managing Director and Head of Technology, Infrastructure & Innovation
Yvonne Dimitroff	Executive Managing Director and Chief Human Resources Officer
Robert Frentzel	Executive Managing Director and Head of Commercial Banking
Jack Markwalter, Jr.	Executive Managing Director and Head of Wealth Management
Lana McKenna	Executive Managing Director and Chief Credit Officer
Julie O'Connor	Executive Managing Director, General Counsel, Corporate Secretary and Head of Regulatory Affairs
Eric Price	Executive Managing Director and Head of Capital Markets
Jeff Steele	Executive Managing Director and President – Specialized Industries
Hammad Pirzada	Vice-President and Treasurer, US Region

X. OVERVIEW OF RESOLUTION PLANNING CORPORATE GOVERNANCE

CIBC Bank USA's IDI Resolution plan has been developed in conjunction with senior management, various internal governance committees, and subject matter experts across CIBC. The Chief Financial Officer, US Region (US CFO) is the senior management official of the CIDI primarily responsible for overseeing the development, maintenance, and filing of CIBC's US Resolution Plans. The US CFO is responsible for presenting the IDI Resolution Plan for board review and approval. CIBC's Board of Directors has delegated the ultimate approval and oversight authority of US resolution plans to the CIDI's Board of Directors (US Board or Board).

Governing and oversight bodies consist of the following groups and individuals.

- ***US Resolution Plan Executive Review Council (US ERC)***: The US ERC was established to provide oversight and direction on the development of US resolution planning capabilities and related strategies. The US ERC is comprised of the senior executives across the US Region that oversee the primary functional groups that contribute to the design and implementation of US resolution planning. The US ERC is chaired by the US CFO.
- ***US Resolution Plan Working Group (US Working Group)***: The US Working Group was formed following the establishment of the US ERC. The US Working Group meets to develop the resolution plan and associated capabilities. The US Working Group is currently comprised of US representatives from (i) Treasury, (ii) Finance, (iii) Technology Infrastructure & Innovation, (iv) Legal, (v) Communications, (vi) Corporate Development, (vii) Risk Management, (viii) Human Resources, and (ix) Parent Bank's Financial Crisis Management Group.
- Additionally, the US Asset Liability Committee, US Executive Committee, and Parent Bank Recovery and Resolution Committee are informed on the US resolution planning process, strategy, and key assumptions for this resolution plan.

XI. DESCRIPTION OF MATERIAL MANAGEMENT INFORMATION SYSTEMS

The CIDI's operations depend critically on a robust framework of management information systems and reporting mechanisms to monitor and ensure the financial health, risk management, and seamless operations of its IDI material entities and core business lines. Accurate, integrity-driven, and timely key technology applications are indispensable for weathering operational disruptions and form the backbone of the firm's operational resilience and resolution planning processes.

A key application includes systems and applications essential for supporting core business lines in a resolution scenario. This includes but is not limited to the following.

- Applications identified by the Operational Resilience program that are required to deliver any Critical Business Services or Critical Shared Services integral to maintaining continuous operations, a subset of the overall list of applications used by CIBC Bank USA.
- Tier 1 and Tier 1 Critical applications, not already identified via the above criteria, are designated by management or the relevant business unit as essential and are required to be operational within twenty-four hours of any business disruption affecting CIBC Bank USA, CIBC National Trust Company, or Parent Bank.
- Risk, compliance, and regulatory reporting applications, not already identified via the above criteria, that are leveraged to fulfill risk management, compliance obligations, or regulatory reporting requirements, ensuring the firm can meet all necessary statutory mandates.
- Client-facing applications, not already identified via the above criteria, including systems and applications directly interfacing with clients, facilitating transactions, service delivery, and customer interactions, which are crucial for maintaining customer trust and ensuring the seamless operation of banking services.
- Book of record and transaction processing systems, not already identified via the above criteria, that maintain essential book of record information or handle critical transaction processing, both financial and non-financial. These applications ensure all transactional data integrity and availability for audit, compliance, and operational needs.
- Resolution information and data production applications, not already identified via the above criteria, are pivotal for generating critical resolution information or data required for strategic planning and execution of resolution processes.