



Notice of change to the CIBC Mutual Funds Account Agreement and Disclosures Booklet

Canadian securities regulators have recently amended our regulatory obligations, including those relating to conflicts of interest, so we are updating and expanding our relationship disclosure information to you. Effective June 30th, 2021 the following disclosures will be added to the *CIBC Mutual Fund Account Agreements and Disclosures Booklet*.

Conflicts of Interest

We take steps to identify material conflicts of interest that we reasonably expect to arise between you and CIBC Securities Inc. or between you and each individual acting on our behalf. We will respond to each such conflict of interest by avoiding, controlling, or disclosing it to you.

The *CIBC Code of Conduct* applies to all employees, contingent workers and directors of Canadian Imperial Bank of Commerce and its wholly-owned subsidiaries, and it sets out how we identify and avoid conflicts of interest.

We want to make sure that you are informed about potential material conflicts, the potential impact to you and how we have addressed them in your best interests.

Conflicts of Interest

We exclusively recommend or purchase on your behalf mutual funds and investment products offered by our parent company CIBC or its affiliates, including the CIBC Mutual Funds and Family of Portfolios, the Renaissance Investments Family of Funds, the Axiom Portfolios and other mutual funds (the Funds) from time to time. Therefore, the suitability determination we conduct for you will not consider the larger market of non-proprietary products or whether those non-proprietary products would be better, worse, or equal in meeting your investment needs and objectives.

We address this inherent material conflict by:

- regularly comparing our proprietary products to alternatives available in the market,
- making a full suite of investment options available, with competitive rates and investment performance,
- leveraging affiliates' advice and services to reduce client costs, and
- having a straightforward selection of available products for CIBC advisors to assess, understand and monitor.

Advisor Compensation

Our mutual fund representatives do not receive selling commissions in connection with the sale of the funds, but are compensated in the form of salary and bonus payment based on a balanced scorecard across various categories including client satisfaction, client retention, net sales and revenue. For the sales and revenue component, products are grouped into categories so there is no incentive to sell one equivalent product over another within each category classification, so that representatives' interests are aligned with yours when recommending one of the many available Funds.

We may refer you to another member of the CIBC Group of Companies. While CIBC Securities Inc. does not pay or receive any referral payments, mutual fund representatives' annual compensation will take into account referrals among the CIBC Group of Companies. Our compensation plan is structured so that the financial benefit received by a mutual fund representative for referrals is effectively the same as for sales, so that any referral recommendations to you will always be in your best interests.