Canadian Imperial Bank of Commerce

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Introduction

Canadian Imperial Bank of Commerce ("CIBC" or the "Bank") issued six sustainability debt instruments between October 2020 and January 2024 (collectively the "Sustainability Instruments")[1,2] to finance and refinance projects related to renewable energy and green buildings. In December 2024, CIBC engaged Sustainalytics to review the projects financed with proceeds from the Sustainability Instruments (the "Nominated Expenditures") and provide an assessment as to whether they meet the use of proceeds criteria and reporting commitments established in their respective frameworks (the "Frameworks").[3,4] This is Sustainalytics' fourth annual review of allocation and reporting of the instruments issued under the Frameworks following previous reviews in December 2021, February 2023 and March 2024.[5,6,7]

Evaluation Criteria

Sustainalytics evaluated the Nominated Expenditures and CIBC's reporting based on whether they:

1. Meet the use of proceeds and eligibility criteria defined in their Frameworks; and
2. Reported on at least one key performance indicator (KPI) for each use of proceeds category defined in the Frameworks.

[1] The Sustainability Instruments include: i) 2020 USD Green Bond, issued in October 2020 and raised USD 500 million; ii) ESG Market-Linked GICs, issued from June 2021 to November 2023 and raised CAD 94 million; iii) CAD Structured Notes, issued in December 2022 and raised CAD 2 million; iv) USD Structured Notes, issued in January 2023 and raised USD 4 million; v) 2024 EUR Green Bond, issued in January 2024 and raised EUR 500 million; and vi) Sustainability Deposit Accounts, deposit made from August 2023 to July 2024 with a value of USD 179.77 million.
[2] CIBC has communicated to Sustainalytics that i) the 2020 USD Green Bond issued in October 2020 was based on the 2020 CIBC Green Bond Framework; ii) the ESG Market-Linked GICs, CAD and USD Structured Notes and the 2024 EUR Green Bond issued between June 2021 and January 2024 were based on the 2021 CIBC Sustainability Issuance Framework; and iii) the Sustainability Deposits made between August 2023 and February 2024 were issued under the 2021 CIBC Sustainability Issuance Framework while those issued between March 2024 and July 2024 align with the 2024 CIBC Sustainability Issuance Framework dated March 2024.
[3] The Frameworks include the 2024 CIBC Sustainability Issuance Framework at (https://www.cibc.com/content/dam/cibc-public-assets/about-cibc/investor-relations/pdfs/debt-information/green-bond/cibc-sustainability-issuance-framework-2024-en.pdf?msockid=1b335d734f226aff2d1e48504ed06b78); which is an update of the 2021 CIBC Sustainability Issuance Framework (https://www.cibc.com/content/dam/about_cibc/investor_relations/pdfs/debt_info/cibc-sustainability-issuance-framework-en.pdf); which in turn is an update of the 2020 CIBC Green Bond Framework (https://www.cibc.com/content/dam/about_cibc/investor_relations/pdfs/debt_info/cibc-green-bond-framework-en.pdf). Sustainalytics has provided SPOs for each of the Frameworks.
[4] CIBC has communicated to Sustainalytics that i) the 2020 USD Green Bond issued in October 2020 was based on the 2020 CIBC Green Bond Framework; ii) the ESG Market-Linked GICs, CAD and USD Structured Notes and the 2024 EUR Green Bond issued between June 2021 and January 2024 were based on the 2021 CIBC Sustainability Issuance Framework (the "2021 Framework"); and iii) the Sustainability Deposits made between August 2023 and February 2024 were issued under the 2021 CIBC Sustainability Issuance Framework while those issued between March 2024 and July 2024 align with the 2024 CIBC Sustainability Issuance Framework dated March 2024.
[5] Sustainalytics, "Annual Review, CIBC", (2021), at: https://www.cibc.com/content/dam/about_cibc/investor_relations/pdfs/debt_info/sustainalytics-2021-annual-review-en.pdf
[6] Sustainalytics, "Annual Review, CIBC", (2023), at: https://www.cibc.com/content/dam/cibc-public-assets/about-cibc/investor-relations/pdfs/debt-information/green-bond/sustainalytics-2022-annual-review-en.pdf
[7] Sustainalytics, "Annual Review, CIBC", (2024), at: https://www.cibc.com/content/dam/about_cibc/investor_relations/pdfs/debt_info/sustainalytics-2023-annual-review-en.pdf

Table 1: 2020 CIBC Green Bond Framework - Use of Proceeds Categories, Eligibility Criteria and Associated KPIs

Use of Proceeds Category	Eligibility Criteria	Key Performance Indicators
Renewable Energy	Development, construction, acquisition, operation, maintenance and distribution of the following renewable energy sources: • Solar • Offshore and onshore wind • Geothermal with direct emissions • Tidal • Small scale (<25 MW) and run-of-river hydroelectric projects, as well as the refurbishment, operation or maintenance of existing hydroelectric facilities Waste biomass that does not deplete existing carbon pools	• CO_2 emissions avoided (tCO_2e) • Total installed capacity (MW)
Green Buildings	Development, construction, acquisition, operation and maintenance of residential or commercial buildings that have: • Received or expect to receive based on design or construction, certification according to third party verified building standards, including Leadership in Energy and Environmental Design (LEED) Gold or Platinum or equivalent levels in other certification programs such as BOMA BEST, BREEAM or ENERGY STAR	• Energy savings (kWh/m^2 of GBA) • $kgCO_2/m^2$ of GBA, with reference to specific certification schemes where relevant • Floor space of green real estate (m^2)

Table 2: 2021 CIBC Sustainability Issuance Framework - Use of Proceeds Categories, Eligibility Criteria and Associated KPIs

Use of Proceeds Category	Eligibility Criteria	Key Performance Indicators
Clean Energy	Development, construction, acquisition, operation, maintenance and distribution of the following renewable energy sources: • Solar • Offshore and onshore wind • Geothermal with direct emissions <100 gCO_2e/kWh • Tidal • Hydrogen generated using renewable energy • Small scale (<25MW) and run-of-river hydroelectric projects, as well as the refurbishment, operation or maintenance of existing hydroelectric facilities • Waste biomass and renewable biofuels whose sources include sustainable agriculture and forestry residues with direct emissions <100gCO_2/kwh	• CO_2 emission avoided (tCO_2e) • Total installed capacity (MW)
Green Buildings	Development, construction, acquisition, operation and maintenance of residential or commercial buildings that meets any of the following: • Received, or expect to receive based on design or construction, certification according to third party verified building standards: • Leadership in Energy and Environmental Design (LEED) Gold or Platinum or equivalent levels in other certification programs such as BOMA BEST (Gold or Platinum), or BREEAM (Excellent or above), ENERGY STAR (85 or above) Passive House Institute - EnerPHit, Toronto Green Standard (v3) Tier 2 or higher, BC Step Code (Step 3 or above) • The development, construction, acquisition, operation and maintenance of industrial buildings that have received or are expected to receive LEED Silver certification will also be confirmed to have been designed to achieve at least a 20% energy efficiency improvement compared to ASHRAE 90.1-2010.	• Energy savings (kWh/m^2 of GBA) • $kgCO_2/m^2$ of GBA, with reference to specific certification schemes where relevant • Floor space of green real estate (m^2)

Table 3: 2024 CIBC Sustainability Issuance Framework - Use of Proceeds Categories, Eligibility Criteria and Associated KPIs

Use of Proceeds Category	Eligibility Criteria	Key Performance Indicators
Clean Energy	Clean energy sources: Solar, offshore and onshore wind, geothermal with direct emissions <100 gCO_2e/kWh on a life cycle basis; tidal. Energy production with feedstock using hydrogen or ammonia generated using clean energy sources, and technologies and infrastructure to support: • Small scale (<25 MW), run-of-river hydroelectric projects, as well as the refurbishment, operation or maintenance of existing hydroelectric facilities. For hydroelectric projects >25 MW, power density or lifecycle emissions thresholds must be met. • Waste biomass and renewable biofuels whose sources include sustainable agriculture (such as RSB and RSPO certification) and forestry (such as Forest Stewardship Council (FSC), the Programme for the Endorsement of Forest Certification (PEFC), and Sustainable Forestry Initiative (SFI)) residues with direct emissions <100 grams of CO_2e/kWh • Nuclear energy and related facilities, services, systems, or equipment, including enrichment and procurement of nuclear fuel and activities related to component replacement or spent fuel management including recycling and storage. Specified transmission infrastructure: Electricity transmission and distribution infrastructure and equipment that complies with at least one of the following criteria: • Over 67% of newly enabled generation capacity below the generation threshold value of 100 grams of CO_2e/kWh, over a rolling-five-year period; or • Enabling the grid to support the integration of renewable or storage technologies that have an emissions threshold below 100 grams of CO_2e/kWh over a rolling five-year period; or • Average system grid emissions factor below the threshold value of 100 grams of CO_2e/kWh, over a rolling five-year period • Investments in research and development that increase the share of low carbon electricity and/or allow the integration of renewable energy to the electricity grid by directly connecting renewable energy, such as connection of renewable energy generation (e.g., microgrids), energy storage systems, and battery systems.	• CO_2 emissions avoided (tCO_2e) • Total installed capacity (MW)
Green Buildings	Residential or commercial buildings or construction projects that meet the following criteria: • Received or expect to receive based on design, construction, operation or maintenance, certifications such as: Leadership in Energy and Environmental Design (LEED) Gold or Platinum; or BOMA BEST (Gold or Platinum); or BREEAM (Excellent or above); or ENERGY STAR (85 or above); or Passive House Institute – EnerPHit; or Toronto Green Standard (v3) Tier 2 or higher; or BC Step Code (Step 3 or above) or National Green Building Standard (Silver or above); or • Achieved, based on third-party assessment, GHG emissions performance in the top 15% of their geographic region (city, province or state, country); or • Achieved, based on third-party assessment, at least 30% over baseline reduction in energy consumption or GHG emissions from retrofits and building envelopes. Data center greenfield and refurbishment projects with a design average annual Power Usage Effectiveness (PUE) at or below 1.50.	• Energy savings (kWh/m^2 of GBA) • $kgCO_2/m^2$ of GBA, with reference to specific certification schemes where relevant • Floor space of green real estate (m^2)

Issuer's Responsibility

CIBC is responsible for providing accurate information and documentation relating to the details of the projects, including descriptions, amounts allocated and impact.

Independence and Quality Control

Sustainalytics, a leading provider of ESG research and ratings, conducted the verification of the use of proceeds from CIBC's Sustainability Instruments. The work undertaken as part of this engagement included collection of documentation from CIBC and review of said documentation to assess conformance with the Frameworks.

Sustainalytics relied on the information and the facts presented by CIBC. Sustainalytics is not responsible nor shall it be held liable for any inaccuracies in the opinions, findings or conclusions herein due to incorrect or incomplete data provided by CIBC.

Sustainalytics made all efforts to ensure the highest quality and rigor during its assessment process and enlisted its Sustainability Bonds Review Committee to provide oversight of the review.

Conclusion

Based on the limited assurance procedures conducted,[8] nothing has come to Sustainalytics' attention that causes us to believe that, in all material respects, the Nominated Expenditures do not conform with the use of proceeds criteria and reporting commitments in the Frameworks. CIBC has disclosed to Sustainalytics that the proceeds from the Sustainability Instruments were fully allocated as of July 2024.

Detailed Findings

Table 4: Detailed Findings

Framework Requirements	Procedure Performed	Factual Findings	Error or Exceptions Identified
Use of Proceeds Criteria	Verification of projects to determine alignment with the use of proceeds criteria outlined in the Frameworks.	The Nominated Expenditures comply with the use of proceeds criteria.	None
Reporting Criteria	Verification of projects or assets to determine if impact was reported in line with the KPIs outlined in the Frameworks.	CIBC reported on at least one KPI per use of proceeds category.	None

[8] Sustainalytics' limited assurance process includes reviewing documentation relating to details of projects, as provided by the issuing entity, which is responsible for providing accurate information. These may include descriptions of projects, estimated and realized costs, and reported impact. Sustainalytics has not conducted on-site visits to projects.

Appendices

Appendix 1: Allocation and Reported Impact from 2020 USD Green Bond

Table 5: Allocation of proceeds from the 2020 USD Green Bond

Use of Proceeds Category	Industry	Project Code Name	Region	Amount Allocated (USD million)
Renewable Energy	Infra-Wind	RE 1	Canada	25.30
		RE 3	Europe	194.44
		RE 4	Europe	24.38
		RE 6	US	23.62
	Infra- Solar	RE 2	Canada	28.43
		RE 5	US	27.29
		RE 7	US	18.08
		RE 9	US	10.38
Green Buildings	Green Buildings	GB 1	Canada	148.08
Total Allocated Amount				**500.00**
Total Unallocated Amount				**0.00**
Net Proceeds Raised				**500.00**

Table 6: Reported Impact from Renewable Energy Projects funded with the 2020 USD Green Bond

Industry	Project Code Name	Impact KPIs			
		Number of underlying projects	Total installed capacity (MW)	Renewable energy generated (MWh)	Annual emissions avoided (tCO_2e)
Infra-Wind	RE 1	2	54	177,317	2,838
	RE 3	3	180	900,000	160,789
	RE 4	1	25	71,980	23,681
	RE 6	4	91	313,943	143,158
Infra-Solar	RE 2	4	10	15,475	503
	RE 5	1	66	133,816	61,020
	RE 7	2	33	64,118	35,586
	RE 9	1	17	42,976	11,818

Appendix 2: Allocation and Reported Impact from the CAD Structured Notes

Table 7: Allocation of proceeds from the ESG Market-Linked GICs (CAD), CAD Structured Notes and USD Structured Notes[9]

Use of Proceeds Category	Industry	Project Code Name	Region	Amount Allocated (CAD million)
Renewable Energy	Infra- Wind	RE 10	Canada	66.46
		RE 11	Canada	12.72
Green Buildings	Green Buildings	GB 1	Canada	22.23
Total Allocated Amount				**101.41**
Total Unallocated Amount				**0.00**
Net Proceeds Raised				**101.41**

Table 8: Reported Impact from Renewable Energy Projects funded with the CAD Structured Notes

Industry	Project Code Name	Impact KPIs			
		Number of underlying projects	Total installed capacity (MW)	Renewable energy generated (MWh)	Annual emissions avoided (tCO_2e)
Infra- Wind	RE 10	4	96	257,149	334
	RE 11	12	10	28,133	914

Table 9: Reported Impact from Green Buildings Projects funded with the 2020 USD Green Bond and CAD Structured Notes[10]

Project Code Name	Impact KPIs						
	Gross Building Area (GBA)	Energy Performance (kWh/m^2 of GBA)	Annual Emissions Reduced ($kg/CO_2/m^2$ of GBA)	Water Efficiency (m^3 of water/m^2 of GBA)	Annual Water Savings	Annual Waste Diverted	Certifications
GB1	176,000	115.98 (-40%)	13.35 (-14%)	0.45	25%	27%	- LEED Platinum Core & Shell - SmartScore Platinum - WELL H&S Rating

[9] The USD Structured Note issuances of USD 4 million are valued at CAD 5.6 million by CIBC.
[10] CIBC has confirmed that the proceeds from the 2020 USD Green Bond and the CAD Structured Notes were used to finance the same project therefore, it is not possible for CIBC to separate the impact of the green building project.

Appendix 3: Allocation and Reported Impact from the 2024 EUR Green Bond

Table 10: Allocation of proceeds from the 2024 EUR Green Bond

Use of Proceeds Category	Industry	Project Code Name	Region	Amount Allocated (EUR million)
Renewable Energy	Wind	RE 12	Canada	27.42
		RE 13	Canada	58.67
		RE 14	Europe	237.57
		RE 15	Europe	71.79
		RE 17	US	44.93
	Solar	RE 18	US	44.38
		RE 21	US	15.24
Total Allocated Amount				**500.00**
Total Unallocated Amount				**0.00**
Total Proceeds Raised				**500.00**

Table 11: Reported Impact from Renewable Energy Projects funded with the 2024 EUR Green Bond

Industry	Project Code Name	Impact KPIs			
		Number of underlying projects	Total installed capacity (MW)	Renewable energy generated (MWh)	Annual emissions avoided (tCO_2e)
Infra-Wind	RE 12	1	13	29,851	970
	RE 13	1	37	113,483	3,687
	RE 14	49	201	474,300	98,215
	RE 15	145	218	478,842	75,369
	RE 17	67	184	439,858	839,500
Infra- Solar	RE 18	1	40	100,543	27,649
	RE 21	3	49	127,855	35,160

Appendix 4: Allocation and Reported Impact from the Sustainability Deposit Accounts

Table 12: Allocation of proceeds from the Sustainability Deposit Accounts

Use of Proceeds Category	Industry	Project Code Name	Region	Amount Allocated (USD million)
Renewable Energy	Infra- Solar	RE 19	US	29.36
		RE 20	US	44.63
	Infra- Solar & Wind	RE 23	Canada	49.71
	Infra- Wind	RE 24	Europe	5.84
	Infra- Solar	RE 22	Canada	50.23
Total Allocated Amount				**179.77**
Total Unallocated Amount				**0.00**
Total Proceeds Raised				**179.77**

Table 13: Reported Impact from Renewable Energy Projects funded with the Sustainability Deposit Accounts

Industry	Project Code Name	Impact KPIs			
		Number of underlying projects	Total installed capacity (MW)	Renewable energy generated (MWh)	Annual emissions avoided (tCO_2e)
Infra- Solar	RE 19	1	43	125,217	28,299
	RE 20	1	42	96,120	21,723
Infra-Solar & Wind	RE 23	6	16	37,077	1,205
Infra- Wind	RE 24	4	85	215,299	1,722
Infra- Solar	RE 22	1	93	208,714	105,261

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