

**美商美國銀行台北分行
防制洗錢及打擊資恐內部控制制度聲明書**

**Bank of America, N.A., Taipei Branch
Statement of Internal Control for AML/ CFT**

謹代表美國銀行台北分行聲明本銀行於 112 年 1 月 1 日至 112 年 12 月 31 日確實遵循防制洗錢及打擊資恐相關法令，建立內部控制制度，實施風險管理，並由超然獨立之稽核部門執行查核，定期陳報總行與區域中心。經審慎評估，本年度各單位防制洗錢及打擊資恐內部控制及法規遵循情形，除後附「防制洗錢及打擊資恐內部控制制度應加強事項及改善計畫」所列事項外，均能確實有效執行。

On behalf of Bank of America, N.A., Taipei Branch, we hereby certify that from January 1st to December 31st, 2023, the bank has duly complied with the relevant regulations For Anti-Money Laundering And Combating The Financing Of Terrorism By Banking Enterprises when establishing its internal control system, implementing risk management, designating an independent and objective audit department to conduct audits, and regularly reporting to headquarter and regional office. After prudent evaluation, except for the items listed in the schedule [the improvement plan and matters for improvement of internal control system for anti-money laundering and combating the financing of terrorism], the internal control and legal compliance systems of each department have been effectively implemented during the year.

謹 致

金融監督管理委員會

The Statement is submitted to the Financial Supervisory Commission

聲明人

Statement by

總經理:

Country Manager

Wayne Liaw



(簽章)

總稽核:

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(簽章)

防制洗錢及打擊資恐專責主管:

Dedicated Manager of AML/ CFT

Eric Kuo



(簽章)

中 華 民 國 113 年 3 月 19 日

美商美國銀行台北分行

防制洗錢及打擊資恐內部控制制度應加強事項及改善計畫

THE IMPROVEMENT PLAN AND MATTERS FOR IMPROVEMENT OF
INTERNAL CONTROL SYSTEM FOR ANTI-MONEY LAUNDERING AND
COMBATING THE FINANCING OF TERRORISM

(基準日 Date: 112 年 12 月 31 日)

應加強事項 Items Needs Improvement	改善措施 Mitigating Measures	預定完成改善時間 Estimated Completion Date
<p>全球銀行與金融市場防制洗錢及打擊資恐作業單位(GBAMAML), 未能持續地及時完成客戶身份持續審查作業。對於台北分行之影響, 則是2022年高風險客戶身份持續審查作業, 未能及時地完成。</p> <p>附註: 此缺失性質係屬區域性。</p> <p>附註: 集團其他屬於全球性或區域性之缺失, 其改善措施均為全球一致推動, 且責任非歸屬於台北分行。目前已知對台北分行均無影響。</p> <p>Delays in CDD refresh completion</p> <p>GB & GM AML team has not been consistently completing CDD refresh on time. More specifically, in BANA Taipei, CDD refresh for 2022 was not completed timely for high-risk customers.</p> <p>Note: This issue is regional in nature.</p> <p>Note: There are other global / regional issues where the remediation is driven globally, and these are not owned by BANA Taipei. There is no known impact to BANA Taipei at this time.</p>	<p>2022年台灣高風險客戶群體之持續審查作業, 已於2023年6月完成。</p> <p>2022 refresh population for Taiwan high-risk clients was completed in June 2023.</p>	<p>屬台灣特定之改善措施, 已於2023年6月完成並由稽核驗證。</p> <p>整體之缺失改善措施, 預計將於2024年3月29日前完成。</p> <p>Taiwan specific actions were completed in June 2023 and validated by Audit.</p> <p>Remediation of the overall issue is planned for completion by March 29, 2024.</p>