

**美商美國銀行在臺分行**  
**防制洗錢及打擊資恐內部控制制度聲明書**  
**Bank of America N.A. Taiwan Branch**  
**Statement of Internal Control for AML/ CFT**

謹代表美國銀行在臺分行聲明本銀行於 2018 年 1 月 1 日至 2018 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，定期陳報董(理)事會/監察人/總行/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. Taiwan Branch, we hereby certify that from January 1<sup>st</sup> to December 31<sup>st</sup>, 2018, 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 the board of directors/ the supervisor/audit committee/board of supervisors/ headquarter/ 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

在臺訴訟及非訴訟代理人：

 (簽章)

Representative of litigious and non-litigious matters in Taiwan / Country Manager

Wayne Liaw

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總稽核／或負責臺灣區稽核業務之主管：

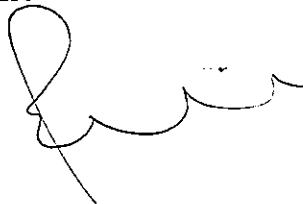
(簽章)

Auditor in charge of auditing on Taiwan Branch

Audit Manager – Corp Audit Asia Pacific

Wing Hang Ip

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防制洗錢及打擊資恐專責主管：

(簽章)

Dedicated Manager of AML/ CFT

Eric Kuo

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中 華 民 國 108 年 3 月 28 日

## 美商美國銀行在臺分行

### 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: 2018 年 12 月 31 日)

應加強事項 For Improvement	改善措施 Measures	預定完成改善時間 Estimated Time of Completion
<p>本行為確保業務及其他作業單位落實防制金融犯罪之風險控管，鼓勵各單位透過自行查核與持續性測試，主動發現潛在風險並提出改善措施。於前揭自行審核中所辨識出需改善之計畫，現皆屬全球性或區域性，係歸因於各單位於執行防制金融犯罪計畫（如：客戶身分確認、名稱及姓名檢核）程序之不一致。</p> <p>The Bank, as part of its effort to ensure that Front Line Units and Control Functions manages its Financial Crimes Risks are encouraged to proactively self-identifying issues and potential control enhancements through their quality reviews and ongoing testing. The existing areas that require enhancement are global and regional in nature, and are attributed to the inconsistent implementation of the Financial Crimes Program including Customer Due Diligence (CDD) and economic sanctions at the Enterprise level.</p> <p>防制金融犯罪作業改善計畫需要提升內部控管流程以符合美國銀行之企業標準，而美國銀行之企業標準相較於法令規定採取更嚴格要求。前述大多數自行查核改善計畫業已完成，惟仍有部分依計畫時程改善中，預計於2019年12月完成。</p> <p>The majority of these areas required enhancement relate to updating internal processes to comply with Enterprise Standards which are often more stringent than Taiwan regulations for Financial Crimes Compliance. Majority of these self-identified issues have since been remediated by</p>	<p>自行查核改善計畫皆屬全球性或區域性，無本行專有之改善措施。</p> <p>No specific action steps owned by BANA Taipei as these issues are global or regional in nature.</p>	<p>自行查核改善計畫將於2019年12月13日完成。</p> <p>The resolution date is set as December 13, 2019.</p>

management, while others are on track for remediation by year-end 2019.

內部稽核正進行美國銀行台北分行之防制金融犯罪專案稽核(Project 19AU28596)，亦會包含評估上開全球性或區域性自行查核改善計畫對於本行的實質性影響。

Corporate Audit is currently performing an audit of Global Financial Crimes related processes for BANA Taipei (Project 19AU28596) which will also include an assessment of applicability of these global and regional issues to BANA Taipei.