

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公司於 109 年 1 月 1 日至 109 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, 2020, the bank has duly complied with the relevant regulations for anti-money laundering and combating the financing of terrorism when establishing its internal control system, implementing risk management, and designating an independent and objective audit department to conduct audits, and regularly report to headquarter and regional office. After prudent evaluations, except for the items listed in the schedule of “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 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)

臺灣區稽核業務主管：

Auditor in charge of auditing on Taipei Branch

Audit Manager – Corporate Audit Asia Pacific

Yik Hang Siu



(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 110 年 3 月 18 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: 109 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(GBAM)有應持續加強事項，如強化確認客戶身份作業流程及控管持續審查作業時程。前述缺失性質係為全球性或區域性，主要由集團權責單位自行辨識並皆已訂定改善計劃。</p> <p>此外，另一區域性缺失亦影響本行，係銀行核心系統中之非拉丁字元交易資料未傳輸到防制金融犯罪交易監控系統，此將可能影響本行辨識疑似可疑交易。</p> <p>Bank of America's Global Banking and Markets (GBAM) requires improvement in Customer Due Diligence (CDD) implementation due to the outstanding CDD theme in quality and timeliness of CDD refresh. These issues are global / regional in nature, and remediation actions for them are driven by relevant management outside of BANA Taipei. Majority of these are self-identified by management.</p> <p>Additionally, there is a regional concern which impacts BANA Taipei. Specifically, non-Latin transactional data that flows through the core banking system are not ingested by Global Financial Crimes' (GFC) transaction monitoring tool, due to the latter not being configured to ingest such data. This may impact the Bank's ability to identify potentially suspicious activity.</p>	<p>前揭缺失之性質係為全球性或區域性，且皆已由集團權責單位訂定改善計劃，本行無應改善措施。</p> <p>These issues are global / regional in nature, and remediation actions for them are driven by relevant management outside of BANA Taipei, with no specific action steps owned by BANA Taipei.</p>	<p>預計於 111 年 3 月底前完成。此後，集團稽核單位會為改善措施之落實進行驗證。</p> <p>Issues are on track for remediation by March 2022. Corporate Audit will perform substantive validation of the issue remediation thereafter.</p>