

**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 111 年 1 月 1 日至 111 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 1<sup>st</sup> to December 31<sup>st</sup>, 2022, 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

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(簽章)

總稽核:

Auditor in charge of auditing on Taipei Branch

Senior Audit Manager – Corporate Audit Asia Pacific

Yik Hang Siu

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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

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(簽章)

中 華 民 國 112 年 3 月 16 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: 111 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>於辦理防制洗錢及打擊資恐作業，針對高風險客戶之定期審查作業，有延遲情形而未能於法規訂定之期限內完成審查。</p> <p><b>Periodic Refresh</b> Delays were noted in the periodic review (Refresh) of high risk customers in accordance with local regulatory requirements.</p>	<p>集團權責單位已採取改善措施，確保高風險客戶之定期審查作業，依法規訂定之期限內完成審查。</p> <p>Steps have been taken to improve the process to ensure refresh of High-Risk clients are conducted in accordance with the regulations.</p>	<p>112 年第二季</p> <p>Q2 2023</p>