

# 美商美國銀行台北分行内部控制制度聲明書

Bank of America, N.A., Taipei Branch

Statement of Internal Control

謹代表美國銀行台北分行聲明本公司於 111 年 1 月 1 日至 111 年 12 月 31 日確實遵循「金融控股公司及銀行業内部控制及稽核制度實施辦法」、「外國銀行在臺分行適用金融控股公司及銀行業内部控制及稽核制度實施辦法」說明對照表、暨金融監督管理委員會備查之風險導向稽核及内部控制制度，建立内部控制制度，實施風險管理，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，並確實遵循前開辦法第三十八條第五款及第三十八條之一規定，與同業公會所定資訊安全自律規範；兼營證券業務部分，確實依據「證券暨期貨市場各服務事業建立内部控制制度處理準則」規定之内部控制制度有效性之判斷項目，判斷内部控制制度之設計及執行是否有效。經審慎評估，本年度各單位内部控制、法規遵循情形及資訊安全整體執行情形，除附表所列事項外，均能確實有效執行。

本聲明書將成為本公司對外公開之主要內容。上述公開之內容如有虛偽、隱匿等不法情事，將涉及證券交易法第二十條、第三十二條、第一百七十一條及第一百七十四條等之法律責任。

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 “Implementation Rules of Internal Audit and Internal Control System of Financial Holding Companies and Banking Industries” (“Regulations”), the Comparison Table of “Implementation Rules of Internal Audit and Internal Control System of Financial Holding Companies and Banking Industries for Foreign Bank Branches”, and the risk-based approach approved by the Financial Supervisory Commission in establishing the internal control system and implementing risk management procedures. The Bank has been audited by independent auditors who submit reports to headquarter and regional office. The Bank has duly complied with Article 38, Item 5 and Article 38-1 of the above Regulations as well as information security self-disciplinary rules issued by the industry association. With respect to the Bank’s securities business, the Bank has conducted evaluation of the effectiveness of the design and implementation of its internal control system in accordance with the criteria described in the

“Regulations Governing the Establishment of Internal Control Systems by Service Enterprises in Securities and Futures Markets”, promulgated by the Securities and Futures Bureau, Financial Supervisory Commission. After prudent evaluations, except for the items listed in the attached schedule, the internal control and compliance systems and the overall implementation of information security of each department have been effectively implemented during the year to which this statement relates.

This Statement shall become a major part of the public disclosure of required information. Any false representation or concealment in this Statement shall be subjected to legal consequences as stipulated in Articles 20, 32, 171 and 174 of the Securities and Exchange Act.

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

Senior Audit Manager – Corporate Audit Asia Pacific

Yik Hang Siu

\_\_\_\_\_



(簽章)

法令遵循主管:

Head of Compliance in Taiwan

Mike Huang



---

(簽章)

資安專責單位主管:

Head of Global Information Security in Taiwan

Ben Teo



---

(簽章)

中 華 民 國 112 年 3 月 16 日

美商美國銀行台北分行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  
 (基準日： 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>本分行在防制洗錢及打擊資恐內部控制制度執行情形，有應加強事項，請詳本分行出具之防制洗錢及打擊資恐內部控制制度聲明書。</p> <p>The Branch has areas of improvements in AML/CFT space, for details please refer to the Statement of Internal Control for AML/CFT.</p>	<p>請詳參本分行出具之防制洗錢及打擊資恐內部控制制度聲明書。</p> <p>Please refer to the Statement of Internal Control for AML/CFT for details.</p>	<p>請詳參本分行出具之防制洗錢及打擊資恐內部控制制度聲明書。</p> <p>Please refer to the Statement of Internal Control for AML/CFT for details.</p>