

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 113 年 1 月 1 日至 113 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, 2024, 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：

Auditor in charge of auditing on Taipei Branch

Senior 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 114 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: 113 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
屬美國銀行台北分行管理之需加強或改善項目 Identified Improvement Plans owned by BANA Taipei		
無 Nil	無 Nil	無 Nil
屬集團管理執行之需加強或改進項目(此類項目非台北分行主導) Identified global/regional Improvement Plans which are not owned by BANA Taipei		
<p>美銀美林集團正持續進行強化集團防制金融犯罪計劃(Global Financial Crimes Program)，其範圍包含治理與監督、可疑活動監控 (交易監控)、經濟制裁、全球金融犯罪系統和資料、防制金融犯罪調查以及確認客戶身分等措施。</p> <p>此計劃為集團在全球主導推動，並非專屬台北分行所有。然而這些強化改善措施將有助於進一步加強台北分行內部控制環境。</p> <p>Bank of America's Global Financial Crimes Program is undergoing enhancements. Areas of enhancements include governance and oversight, suspicious activity monitoring (transaction monitoring), economic sanctions, global financial crimes systems and data, investigations and customer due diligence. These enhancements are owned and managed globally, and are not specific to Taiwan. These improvements will help strengthen the control environment in Taiwan.</p>		