

## 安泰商業銀行內部控制制度聲明書

謹代表安泰商業銀行聲明本銀行於 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內部控制及稽核制度實施辦法」及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，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，定期陳報董事會及審計委員會。

兼營證券業務部分，並依據「證券暨期貨市場各服務事業建立內部控制制度處理準則」規定之內部控制制度有效性之判斷項目，判斷內部控制制度之設計及執行是否有效。

兼營保險經紀人業務部分，並依據「保險代理人公司保險經紀人公司內部控制稽核制度及招攬處理制度實施辦法」之規定判斷本銀行內部控制制度之設計及執行是否有效。

本銀行採用至少包括(一)控制環境、(二)風險評估、(三)控制作業、(四)資訊與溝通、(五)監督作業之內部控制制度判斷項目，檢查內部控制制度之設計及執行之有效性。基於前述各項檢查結果，認為上開期間之內部控制制度(包括知悉營運之健全性、報導之可靠性、相關法令規章之遵循及資訊安全整體執行情形)之設計及執行，除附表所列事項外，均能確實有效執行。

本聲明書業經本銀行中華民國 112 年 3 月 9 日董事會通過，並將成為本銀行年報及公開說明書之主要內容，並對外公開。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相關規定之法律責任。

謹 致

金融監督管理委員會

聲明人

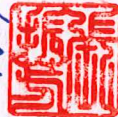
董事長：

總經理：

總稽核：

總機構法令遵循主管：

資訊安全長：



中 華 民 國 1 1 2 年 3 月 9 日

# 111 年度內部控制制度應加強事項及改善計畫

(基準日：111 年 12 月 31 日)

應加強事項	改善措施	預定完成改善時間
一、辦理保險經紀人業務，對於高齡者購買投資型保單，其辦理投資標的轉換，應研議及強化投資標的轉換妥適性之檢核機制。	<ol style="list-style-type: none"> <li>1. 對投資標的轉換之客戶電訪率由 2%調整為全面性 100%電訪，以逐案確認客戶為自主性轉換，並已充分瞭解轉換費用及相關風險。</li> <li>2. 對高齡客戶案件加強關懷提問，以確認客戶瞭解投資標的轉換對其之潛在影響及各種不利因素。</li> <li>3. 每月將轉換案件統計及分析資料提供各層級管理人員，憑以加強管理。</li> </ol>	已改善。
二、與 OBU 非自然人客戶建立業務關係時，即時風險評估與 AML 系統客戶風險評估之方式有不一致之情形。	已修正 OBU 非自然人客戶即時風險評估之判斷方式，使與 AML 系統客戶風險評估方式一致。	已改善。





## EnTie Commercial Bank Statement of Internal Control System

On behalf of EnTie Commercial Bank, we declare that, during the period from January 1 to December 31, 2022, the Bank fully abided by the Implementation Rules of Internal Audit and Internal Control System for Financial Holding Companies and Banking Industries and the provisions of Paragraph 5, Article 38 and Article 38-1, and self-regulatory rules for information security stipulated by the trade association, and established a system of internal controls, implemented risk management, and designated a fully independent audit department to conduct audits and report the results to the Bank's Board of Directors and Audit Committee on a regular basis.

For the securities business in which the Bank concurrently engages in, the assessment items stipulated in the Regulations Governing the Establishment of Internal Control Systems by Service Enterprises in Securities and Futures Markets were used to determine the effectiveness of the design and implementation of the Bank's system of internal controls.

For the insurance broker business in which the Bank concurrently engages, the Bank determines the effectiveness of its internal control system design and implementation in accordance with the Regulations Governing the Implementation of Internal Control and Audit System and Business Solicitation System of Insurance Agent Companies and Insurance Broker Companies.

The Bank evaluated the effectiveness of its internal control system design and implementation based on five measurement items, namely: (1) control environment, (2) risk assessment, (3) control activities, (4) information and communication, and (5) monitoring operation. Based on the results of the above-mentioned evaluation, it is considered that the design and implementation of the internal control system (including the soundness of the operation, the reliability of reporting, the compliance with relevant laws and regulations and the overall information Implementation security) during the said period, except for items listed in the Attachment, was effectively implemented.

This statement, approved by the Board on March 9, 2023, will become primary contents included in the annual report and prospectus of the Bank and will be publicly announced. If any fraudulent information, concealment or unlawful practices are discovered in the contents of the aforementioned information, the Bank shall be held liable under Articles 20, 32, 171 and 174 of the Securities and Exchange Act.

The above Statement is hereby duly submitted to the Financial Supervisory Commission for recordation.

Issued by

Chairman:

President:

Chief Auditor:

Head Office Chief Compliance Officer:

Chief Information Security Officer:

Date: March 9, 2023

## EnTie Commercial Bank

### Improvements Needed to Be Made and Improvement Plan for Internal Control System

(Base date: December 31, 2022)

Improvements needed to be made	Improvement measures	Estimated completion time
1. The Bank is considered needing to improve the mechanism for examining the appropriateness of switching investment targets by elderly applicants with investment-type insurance policies.	(1) The sampling percentage of investment targets switching cases for costumer phone interviews has been raised from 2% to 100% to confirm that customers had not been coerced and has fully knowledge of the details, fees, and relevant risks. (2) With respect to elderly customers applying for switching investment targets, more questions are now asked to make sure that the customers understand the potential impacts and various unfavorable factors. (3) The investment target switches are counted and analyzed each month, and provided to the managerial personnel at all levels regularly so as to strengthen business and operations management.	Completed.
2. Inconsistencies are discovered between real-time risk assessment and customers risk assessment on AML system while establishing business relationship with an OBU non-natural person customer.	The real-time risk assessment methods of OBU non-natural person customer are adjusted to fit the methods of AML system.	Completed.

