

台北富邦商業銀行股份有限公司內部控制制度聲明書

- 一、謹代表台北富邦商業銀行股份有限公司聲明本公司於 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內部控制及稽核制度實施辦法」，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，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。
- 二、兼營證券業務部分：
本公司已確實依據「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。
- 三、兼營保險代理人業務部分：
本公司已確實依據「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」規定之內部控制制度有效之判斷項目，判斷內部控制制度之設計與執行是否有效。
- 四、經審慎評估，本年度各單位內部控制、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。
- 五、本聲明書將成為本公司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或保險法等相關規定之法律責任。
- 六、本聲明書業經本公司中華民國 112 年 3 月 13 日董事會通過，併此聲明。

謹 致

金融監督管理委員會

聲明人

董事長：

(簽章)

總經理：

(簽章)

總稽核：

(簽章)

總機構法令遵循主管：

(簽章)

資訊安全長：

(簽章)

中 華 民 國 112 年 3 月 13 日

台北富邦商業銀行股份有限公司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
<p>一、土城分行個金客戶經理與客戶有異常資金往來，查證作業有欠周延。</p> <p>以上遭金管會核處應予糾正</p>	<p>1. 已優化「關聯戶」報表檢核。</p> <p>2. 已加強行員法遵訓練，並定期發送行員禁止事項通知，加強客戶之教育宣導。</p>	<p>已完成改善。</p>
<p>二、辦理保險代理人業務：</p> <p>(一)招攬投資型保險商品，提供之商品不符客戶風險屬性，經保險公司照會後，始重新瞭解客戶之風險屬性並變更客戶風險屬性及其投資標的，惟未附佐證資料並說明合理性。</p> <p>以上遭金管會核處新臺幣 60 萬元整</p>	<p>1. 已強化系統投保之自動檢核。</p> <p>2. 非系統投保者，因客戶風險屬性變更照會案件，需檢附佐證資料並經簽署人確認合理性。</p>	<p>已完成改善。</p>
<p>(二)客戶投保日前三個月內有向本行辦理貸款，惟業務員招攬報告書未確實勾選揭露，或未瞭解保費資金來源。</p> <p>以上遭金管會核處新臺幣 60 萬元整</p>	<p>1. 已強化投保前系統檢核行內貸款記錄與業務員報告書勾選結果之一致性。</p> <p>2. 已加強教育訓練及落實覆核。</p>	<p>已完成改善。</p>
<p>(三)</p> <p>1. 保險費資金來源檢核未涵括新契約投保當日辦理舊保單解約者，或電訪內容未依商品特性明確告知最大可能損失金額。</p> <p>2. 客戶說明會簡報內容欠妥適。</p> <p>3. 保戶申請投資型保單，復解約舊保單，未充分告知新保單投資標的屬舊保單可連結之投資標的。</p> <p>4. 保險公司照會案件管理機制由分行管理及追蹤，未有效防範業務員不當招攬。</p>	<p>1. 已增加系統送件比對及解約資訊建檔，強化檢核時效；電訪內容已明確告知最大可能損失金額。</p> <p>2. 已強化簡報製作管理規範，應以衡平及顯著方式揭露風險。</p> <p>3. 已增列「保單權益變更確認書」應注意事項加強提醒；定期比對新舊保單投資標的可連結者，須再次照會確認。</p> <p>4. 照會案件已由總行追蹤分行處理情形，並產製月報陳送業務督導主管。</p>	<p>已完成改善。</p>



應 加 強 事 項	改 善 措 施	預 定 完 成 改 善 時 間
以上遭金管會核處新臺幣 120 萬元、予以糾正，及於文到一個月內改善照會案件控管機制。		
三、網路/行動銀行資料庫發生存取資料速度緩慢事件	1. 已完成驅動程式軟體更新。 2. 已修訂「光纖儲存設備異地同步操作程序」、「資料庫事件處理程序」，強化應變措施及提升金融服務韌性。	已完成改善。
<p>【子公司_富邦華一銀行】</p> <p>四、天津監管局對天津分行現場檢查發現授信業務貸款用途不合規，未單獨針對借款人進行盡職調查。</p> <p>以上遭天津監管局裁罰人民幣 20 萬元。</p>	1. 已全數收回貸款。 2. 已加強宣導及教育訓練，嗣後落實貸前盡職調查。	已完成改善。



Taipei Fubon Commercial Bank Co., Ltd.

Internal Control System Statement

1. On behalf of Taipei Fubon Commercial Bank Co., Ltd., we hereby declare that the Company has indeed complied with the "Implementation Rules of Internal Audit and Internal Control System of Financial Holding Companies and Banking Industries" from January 1, 2022 to December 31, 2022, and established internal control system, implemented risk management, and conducted inspections by an independent audit department to report to the Board of Directors and Audit Committee regularly. The Company complies with the provisions of Article 38(5) and Article 38-1 of the aforementioned Regulations and the self-disciplinary guidelines on information security established by the Bankers Association.
2. Concurrent securities business:
The Company has judged whether the design and implementation of the internal control system is effective in accordance with the judgment items of the effectiveness of the internal control system stipulated in the "Regulations Governing the Establishment of Internal Control Systems by Service Enterprises in Securities and Futures Markets".
3. Concurrent insurance agent business:
The Company has judged whether the design and implementation of the internal control system is effective in accordance with the judgment items of the effectiveness of the internal control system stipulated in the "Regulations Governing the Implementation of Internal Control and Audit System and Business Solicitation System of Insurance Agent Companies and Insurance Broker Companies".
4. After careful evaluation, the internal controls, compliance with laws and regulations, and the overall implementation of information security of each unit during this year, except for the matters listed in the attached table, were effectively implemented.
5. This statement will become the main content of the Company's annual report and prospectus, and will be made public. If any of the aforementioned disclosed content is false, concealed, etc., the Company will be subjected to legal liability under Article 20, Article 32, Article 171 and Article 174 of the relevant provisions of the Securities and Exchange Act or the Insurance Act.
6. This statement was approved by the Company's Board of Directors on March 13, 2023 and the Company hereby declares.

To the Financial Supervisory Commission

Declarant

Chairperson :



(Signature and seal)

President :



(Signature and seal)

Chief Auditor :



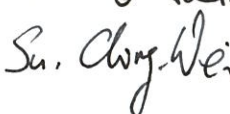
(Signature and seal)

Chief Compliance Officer for the Head Office :



(Signature and seal)

Chief Information Security Officer:



(Signature and seal)

March 13, 2023

Taipei Fubon Commercial Bank Co., Ltd.
Internal Control System Enhancements and Improvement Plans
(Reference date : December 31, 2022)

Matters that should be enhanced	Improvement measures	Estimated time for completion of improvements
<p>I. The relationship manager of Tucheng Branch had abnormal fund transactions with customers, and the verification operation was not conducted in a thorough manner.</p> <p>The Financial Supervisory Commission (FSC) issued an order of rectification.</p>	<p>1. We have improved the verification of "Affiliated Account Activities" report.</p> <p>2. We have enhanced compliance training for bank employees, and regularly issued notices of prohibited behaviors for the attention of bank employees. We also continuously strengthen customer education and promotion.</p>	Improvements were completed.
<p>II. Insurance agent business:</p> <p>(I) The investment-linked insurance products offered do not match the know-your-customer (KYC) risk level of the customers, which after the insurance company's notice, the customer's KYC was re-evaluated to match the risk level of the investment-linked products. However no supporting document/information is attached to justify the change.</p> <p>FSC imposed a fine of NT\$ 0.6 million.</p>	<p>1. We have strengthened the automatic verification feature through the system.</p> <p>2. For applications not delivered through system, any change to the customer's KYC after notification from the insurance company must be accompanied by supporting document/information, which is to be confirmed and signed by the Insurance Product Dept. of Head Office.</p>	Improvements were completed.
<p>(II) The customer had applied for a loan from the Bank within three months prior to the purchase of insurance, but the salesperson did not disclose it in the sales solicitation report, or did not properly identify the source of premium funds.</p> <p>FSC imposed a fine of NT\$ 0.6 million.</p>	<p>1. We have strengthened the system to check the consistency of the loan records in the Bank and the disclosures in the salesperson's report before acceptance of the insurance application.</p> <p>2. Further education and training were conducted.</p>	Improvements were completed.
<p>(III)</p> <p>1. The verification of source of insurance premium funds does not include the termination of existing policy on the date of the purchase of new insurance contract, or no disclosure of the maximum possible loss when conducting telephone confirmation.</p> <p>2. The content in the customer presentation is inappropriate.</p> <p>3. When customers applied for a new investment-linked product with proceeds from the termination of an existing policy, they were not adequately informed that the existing</p>	<p>1. We have added system application comparison and policy termination information to enhance the efficiency of verification; telephone confirmation is clearly disclosed with the maximum possible loss amount.</p> <p>2. We have strengthened the management procedure for the preparation of presentation to customers with balance disclosure of the risks in a fair and clear manner.</p> <p>3. We have added important matters to the "Confirmation of Change of Policy Benefits" to remind customers; we periodically compare the underlying investments that can be linked to the existing and new policies, and will reconfirm with customers.</p> <p>4. Head office will track the progress of branch's</p>	Improvements were completed.



<p>policy can also be linked to the underlying investment of the new policy.</p> <p>4. The insurance company's confirmation notice was managed and tracked by the branch, which did not effectively prevent improper solicitation of salespersons.</p> <p>FSC imposed a fine of NT\$ 1.2 million and issued an order of rectification. At the same time, the confirmation notice control mechanism was to be improved within one month after the receipt of the FSC letter.</p>	<p>handling of the insurance company's confirmation notice. And a monthly report will be sent to a higher management who supervise branch businesses .</p>	
<p>III. Slow data retrieval process from Internet/mobile banking database.</p>	<p>1. Driver software update was completed. The "Optical Storage Device Offsite Synchronization Operation Procedures" and "Database Incident Handling Procedures" were revised to strengthen our contingency measures and to enhance the resilience for providing our financial services.</p>	<p>Improvements were completed.</p>
<p>Subsidiary - Fubon Bank (China) Co.,Ltd</p> <p>IV. The on-site inspection of Tianjin Branch by the Tianjin Regulatory Bureau found that the use of loan proceeds was not in compliance with the regulations, and no due diligence was conducted on the borrowers separately.</p> <p>The Tianjin Regulatory Bureau imposed a fine of RMB 0.2 million.</p>	<p>1. Full recovery of loans was made. 2. We have reinforced the awareness and education training, and subsequently further enhanced pre-lending due diligence.</p>	<p>Improvements were completed.</p>

