

## 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112年1月1日至112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113年3月8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：

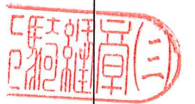
資訊安全長：



中 華 民 國 1 1 3 年 3 月 8 日

**112 年度內部控制制度應加強事項及改善計畫**  
(基準日：112 年 12 月 31 日)

應加強事項	改善措施	預定完成改善時間
一、本行新臺幣活期性存款計息程式未檢核「付息日」與「利率調整生效日」恰為同一日之情境，致溢付部分客戶存款利息。	1. 存款付息程式已完成修正，追蹤後續計息已正常無誤。 2. 溢付利息已持續收回。	已改善完成。
二、審核一定金額以上之授信案件，應有獨立董事參與討論。	修正本行授信作業相關規範，單一授信案件金額達一定門檻以上應有獨立董事參與討論後，再依本行授信授權規定辦理。	預計於 113 年 6 月底前完成改善。
三、本行作業委外範圍應增加不動產擔保鑑價項目。	修正本行作業委外相關規範，與受託鑑價機構簽訂委外契約後，向主管機關申報。	預計於 113 年 6 月底前完成改善。
四、辦理非自然人客戶開戶作業，有未落實以下作業之情形： (一)於主機系統鍵入錯誤之無記名股票發行資訊。 (二)於即時客戶風險評估作業誤填免辨識實質受益人，且於主機系統漏未鍵入實質受益人之姓名。	1. 已於主機系統補正客戶資訊。 2. 已加強教育訓練，宣導注意作業表單填寫及系統資料鍵機之正確性。 3. 於主機系統增加非自然人客戶之實質受益人資料檢核機制。	1. 已改善完成。 2. 已改善完成。 3. 系統檢核機制預計於 113 年 9 月底前完成建置。



## 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, 2023, 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.

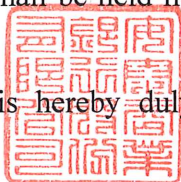
For the securities business in which the Bank concurrently engages in, the assessment items stipulated in the Regulations Governing the Establishment of Internal Control Systems by Service Enterprises in Securities and Futures Markets were used to determine the effectiveness of the design and implementation 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 8, 2024, will become primary contents included in the annual report and prospectus of the Bank and to 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:

*Wendell*  
*Jeff Chang*  
*Rogee*

*Morris Chang*

*Bo Chen*



Date: March 8, 2024

## EnTie Commercial Bank

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

(Base date: December 31, 2023)

Improvements needed to be made	Improvement measures	Estimated completion time
1. The interest calculation program for demand deposits of the Bank is considered not reviewed the situation that "Interest Payment Date" and the "Interest Rate Adjustment Effective Date" fall on the same date, which caused the overpayment of interest on part of deposit customers.	(1) Corrections to the deposit interest payment program have been completed and the subsequent interest accruals has been checked normalized. (2) The overpaid interests have been consistently recovering.	Completed.
2. Independent directors should be involved in the discussion of credit cases above a certain amount.	The Bank's credit regulations have been amended that require independent directors should be involved in the discussion of a single credit case that is above a certain amount, and then conducted with the Bank's credit authorization requirements.	Expected to be completed by the end of June, 2024.
3. The scope of the Bank's outsourcing should be expanded to include collateralized real estate appraisal.	The Bank will amend the outsourcing regulations, sign the outsourcing contract with the external appraisal agency and report to the competent authorities.	Expected to be completed by the end of June, 2024.
4. In the case of opening an account for a non-natural person customer, the following procedures have not been implemented: (1) Incorrect entry of bearer shares issuance information in the system. (2) Incorrect exempt to identify the beneficial owner in real-time customer risk assessment operation, and the beneficial owner's name was not keyed into the system.	1. Customer information has been corrected in the system. 2. Training conducted on the correctness of form filling and system data keying. 3. The Bank will have an additional mechanism to check the beneficial owner information of non-natural person customers in the system.	1. Completed. 2. Completed. 3. Expected to be completed by the end of September, 2024.

