

# 西班牙對外銀行在臺分行內部控制制度聲明書

## **BBVA Bank, Taipei Branch** **Statement of Internal Control**

謹代表西班牙對外銀行在臺分行聲明本銀行於 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」、「外國銀行在臺分行適用銀行內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內部控制制度）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，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，定期陳報總行及區域中心。經審慎評估，本年度各單位內部控制、法規遵循制度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。

On behalf of Banco Bilbao Vizcaya Argentaria, S.A., Taipei Branch ( "the Bank" ), we hereby certify that from 1 January 2023 to 31 December 2023, the Bank has duly complied with the "Implementation Rules of Internal Audit and Internal Control System of Financial Holding Companies and Banking Industries", and 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, and having internal auditors to undertake audit works and comply with the Article 38 (5) and Article 38-1 of Implementation Rules of Internal Audit and Internal Control System of Financial Holding Companies and Banking Industries, and Self-regulatory Rules on Information Security issued by the Banking Association and with the results reported to the Headquarter and the Regional Office. After prudent evaluation, except for the items listed in the attached schedule, the Bank' s each department has implemented effective internal control, compliance systems, and Information Security during the year to which this statement relates.

謹 致

金融監督管理委員會

The Statement is submitted to the Financial Supervisory Commission

BI190-1

(106 生效版)

聲明人

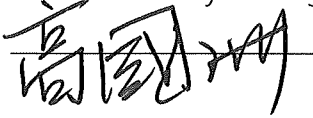
Statement by

在臺訴訟及非訴訟代理人：

Representative of litigious and non-litigious matters in Taiwan / Country Manager

高國洲 James Kao

( 簽章 )



總稽核 / 或負責臺灣區稽核業務之主管:

Auditor in charge of auditing on Taiwan branch

Pedro Alonso Rubio

( 簽章 )

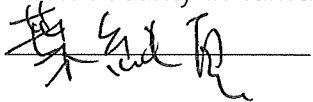


臺灣區資訊安全單位專責主管：

The Chief Officer in charge of Implementation of Information Security in Taiwan

葉純真 Jennifer Yeh

( 簽章 )

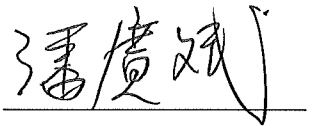


臺灣區遵守法令主管：

Head of Compliance in Taiwan

潘廣斌 David Pan

( 簽章 )



中 華 民 國 113 年 3 月 28 日

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西班牙對外銀行在臺分行內部控制制度應加強事項及改善計畫

**BBVA Bank, Taipei Branch**

**Enhancement Items and Improvement Plans under the Internal Control System**

( 基準日：112 年 12 月 31 日 )

(Base Date: 31 December 2023)

應 加 強 事 項 Enhancement Items	改 善 措 施 Improvement Plans	預定完成改善時間 Target Date
<p>依總行稽核於民國 112 年 2 月出具之「電腦系統資訊安全評估報告」，其整體評估結果除以下三點須改善外，餘未發現重大異常之情事。</p> <p>Based on BBVA Madrid' s "Independent Compliance Assessment on Information Security of Computer Systems" for BBVA Taipei Branch received in February 2023, overall result is "adequate" with 3 minor improvements noted.</p> <p>1. 總行受台北分行委託處理電腦資訊系統作業服務級別合約中所陳述之系統支援軟體，尚未及時更新以符合實際</p>	<p>1. 總行將進行該合約之更新與覆核作業，俟覆核作業完成，提供予台北分行。</p>	<p>1. 總行已完成該合約之更新與覆核作業。</p> <p>SLA has been reviewed and updated.</p>

應 加 強 事 項 Enhancement Items	改 善 措 施 Improvement Plans	預定完成改善時間 Target Date
<p>應用情形。</p> <p>SLA between Taipei Office and BBVA Madrid which specifies the service levels (availability) of the applications hosted in BBVA Madrid and which provide service to the Taipei office is not updated.</p> <p>2. 總行針對銀行整體外部網絡防火牆之作業持續加強中，以確保銀行網絡系統之安全。</p> <p>There is ongoing project to strengthen the security of the external network firewall, and by end of May 2023, all the firewall rules should be reviewed by BBVA Madrid to make sure they do not compromise bank's</p>	<p>SLA will be reviewed and updated by BBVA Madrid.</p> <p>2. 該防火牆所有相關規定預定於民國 112 年 5 月 31 日前經總行覆核完成。</p> <p>By end of May 2023, all the firewall rules should be reviewed by BBVA Madrid to make sure</p>	<p>2. 總行已於民國 112 年 5 月覆核完成。</p> <p>BBVA Madrid has completed the review of all firewall rules and no material issues noted that will compromise banks' system security.</p> <p>3. 本行之資訊部門已於民國 112 年 1 月</p>

應 加 強 事 項 Enhancement Items	改 善 措 施 Improvement Plans	預定完成改善時間 Target Date
<p>system security.</p> <p>3. 台北分行持有共 31 台電腦，計有 16 台電腦使用過時的作業系統，該停止支援安全更新之系統將使組織暴露於資訊安全風險中。</p> <p>16 out of 31 computers listed in Taipei Office have operating systems with obsolete versions that could compromise the security of the organization.</p>	<p>they do not compromise bank's system security.</p> <p>3. 本行之資訊部門應於民國 112 年 1 月完成全面性系統版本升級作業。</p> <p>Taipei IT will upgrade all operating systems to the latest version.</p>	<p>完成升級作業。</p> <p>Taipei IT has remediated this in Jan 2023 where all operating systems have been upgraded to the latest version.</p>

應 加 強 事 項 Enhancement Items	改 善 措 施 Improvement Plans	預定完成改善時間 Target Date