

# 香港上海滙豐銀行在臺分行 內部控制制度聲明書

The Hongkong and Shanghai Banking Corporation Limited, Taipei Branch  
Statement of Internal Control

謹代表香港上海滙豐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金融控股公司及銀行業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，定期陳報稽核委員會/區域總部，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。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 The Hongkong and Shanghai Banking Corporation Limited, Taipei Branch, we hereby certify that from January 01, 2023 to December 31, 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, implementing risk management procedures. The Bank has duly complied with the subparagraph 1, Article 38 and Article 38-1 of above Implementation Rules, and the information security self-disciplinary regulations specified by the Banks Association of the ROC.

The Bank has been audited by independent auditors who submit reports to Audit Committee 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 overall information security implementation 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

聲明人

Statement by

在臺訴訟及非訴訟代理人：

蔣書城 Miles

(Signature)



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

蔣書城 Miles Chiang

總稽核：

羅潔儀

(Signature)

Head of Global Internal Audit, Asia Pacific

羅潔儀 Astor Law

臺灣區法令遵循主管：

蔡慧瑜

(Signature)

Head of Compliance in Taiwan

蔡慧瑜 Susie Tsai

臺灣區資訊安全主管：

陳麗如 Sharon

(Signature)

Officer in Charge of Information Security in Taiwan

陳麗如 Sharon Chen

中 華 民 國 113 年 3 月 18 日

March 18, 2024

香港上海滙豐銀行在臺分行  
內部控制制度應加強事項及改善計畫

The Hongkong and Shanghai Banking Corporation Limited, Taipei Branch

The Enhancement of Internal Controls & Remediation Plan

(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 Remediation Plan	預 定 完 成 改 善 時 間 Planned Completion Date
無 Nil	無 Nil	無 Nil

**香港上海滙豐銀行在臺分行  
防制洗錢及打擊資恐內部控制制度聲明書**

The Hongkong and Shanghai Banking Corporation Limited, Taipei Branch  
Statement on Internal Control for AML/CFT

謹代表香港上海滙豐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，定期陳報稽核委員會/區域總部。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 The Hongkong and Shanghai Banking Corporation Limited, Taipei Branch, we hereby undertake that from January 01, 2023 to December 31, 2023, the Bank has duly complied with relevant regulations governing anti-money laundering and countering the financing of terrorism in establishing an internal control system, implementing risk management, designating an independent and objective internal audit function to conduct audit, and submitting the audit report periodically to Audit Committee and the Regional Office. Following prudent evaluation, it is found that except for items listed in the attached "Enhancement Items and Improvement Plan for AML/CFT Internal Control System", each department of the Bank has effectively implemented internal controls for anti-money laundering and countering the financing of terrorism during the year.

此 致

金融監督管理委員會

The Statement is submitted to the Financial Supervisory Commission

聲明人

Statement by

在臺訴訟及非訴訟代理人：蔣書城 miles (Signature)

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

蔣書城 Miles Chiang

總稽核：羅潔儀 (Signature)

Head of Global Internal Audit, Asia Pacific

羅潔儀 Astor Law

防制洗錢及打擊資恐專責主管：蔡慧瑜 (Signature)

Financial Crime Compliance Officer

蔡慧瑜 Susie Tsai

中 華 民 國 113 年 3 月 18 日

March 18, 2024

# 香港上海滙豐銀行在臺分行

## 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 Hongkong and Shanghai Banking Corporation Limited, Taipei Branch  
Enhancement Items and Improvement Plan for AML/CFT 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 Remediation Plan	預 定 完 成 改 善 時 間 Planned Completion Date
無 Nil	無 Nil	無 Nil