

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114年1月1日至114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 2025 to 31 December 2025, 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

聲明人

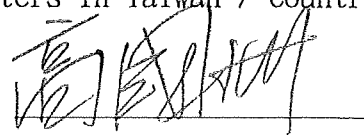
Statement by

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)

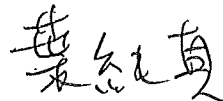


臺灣區資訊安全單位專責主管：

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

葉純真 Jennifer Yeh

(簽章)

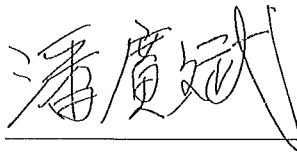


臺灣區遵守法令主管：

Head of Compliance in Taiwan

潘廣斌 David Pan

(簽章)



中 華 民 國 115 年 3 月 25 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：114 年 12 月 31 日)

(Base Date: 31 December 2025)

應 加 強 事 項 Enhancement Items	改 善 措 施 Improvement Plans	預定完成改善時間 Target Date
<p>辦理個人資料盤點，文件保管作業，有下列事項欠妥：</p> <p>1. 所蒐集員工之個人機敏資料有未納入盤點範圍，應依規加強個資盤點及文件保管機制。</p> <p>The following aspects of the handling of personal data inventory and document storage are inadequate:</p> <p>1. Taipei HR did not include Police Criminal Record Certificates/Certificate of no- criminal conviction of employees in the Personal Data Inventory document. Please strengthen the mechanism for personal data inventory and document safekeeping</p>	<p>1. 人事部門已對於員工進行「員工背景調查報告，其中包括但不限於「台灣刑事犯罪紀錄調查，故無需重複將員工之刑事犯罪紀錄證明納入盤點範圍。</p> <p>另，本行已於內部管理會議中決議自即日起不再將員工之個人機敏資料納入個人資料盤點範圍。</p> <p>Taipei HR has already conducted "Employment Screening Report" for all employees, including but not limited to "Taiwan Criminal Checks". Therefore, it is unnecessary to repeatedly include employees' criminal record certificates in the inventory.</p> <p>Additionally, Taipei Management meeting has ceased employees' sensitive personal information (i.e. certificates of good conduct) in the personal data inventory.</p>	<p>本行已於 2025 年 12 月 30 日前完成改善</p> <p>BBVA Taipei Branch has completed the improvement before 30 December 2025.</p>
<p>2. 對已離職員工之人事資料，尚未建立保存年限及刪除機制，應請依規加強個資盤點及文件保管機制。</p> <p>2. Taipei HR did not establish retention period and deletion mechanism for personnel data of former employees. Please strengthen the mechanism for personal data inventory and document safekeeping.</p>	<p>2. 本行已於內部管理會議中通過有關本行對於已離職員工之人事資料保存期限為至少保存 6 年，並由人事暨行政資源部門於每年年底時確認上述資料之保存期限。前述員工資料保存期限已詳載於員工手冊。本行人事部門亦對已離職員工之人事資料於保存期限屆滿後，</p>	

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<p>對核非專業機構投資人之衍生性金融商品避險額度作業，未洽客戶提供與其他金融機構承作情形供參，應加強辦理衍生性金融商品額度核給作業。</p> <p>Taipei Global Markets Sales extends or renews credit to customers other than professional institutional investors for financial derivatives transactions which did not ask the customer to provide information on the credit limits extended to the customer by other financial institutions for financial derivatives transactions. Please strengthen the operation process of approving for extending credit limit to customers for financial derivatives transactions.</p>	<p>將統一造冊並刪除已離職員工之人事資料。</p> <p>Taipei Management meeting has decided to retain the personnel data of former employees for at least six years. The retention period of employee data has documented in the Taipei Employee Handbook. Taipei HR will also delete the personnel data of former employees upon the expiration of the retention period.</p> <p>本行全球資本市場之業務人員應向企業法人客戶詢問並請該客戶提供與其他金融機構承作衍生性金融商品之額度予本行。另，前述業務人員在取得客戶之回覆後，應透過公開資訊觀測站來查詢該客戶最新衍生性商品交易資訊，以該資訊佐證客戶確實與其他金融機構有衍生性金融商品交易往來。</p> <p>Taipei Global Markets Sales shall request corporate customers to provide credit lines for derivative products with other financial institutions. Additionally, when Global Markets Sales shall use the public information platform (MOPS) to check the customer's latest information regarding derivatives transactions when receiving response from customers. The above is to confirm that customer has engaged in derivatives transactions with other financial institutions.</p>	<p>本行已於 2025 年 12 月 30 日前完成改善</p> <p>BBVA Taipei Branch has completed the improvement before 30 December 2025.</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>依總行於民國 114 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 2025, overall result is “Adequate” with some deficiencies identified.</p> <p>針對銀行整體網絡運作包含伺服器與互聯網等設備、及其連線至網際網路之檢測，總行發現以下缺失：</p> <p>a) 在基礎設施和網路層面識別出一些會影響企業及投資銀行客戶服務的單點故障，其中包括一些支援台北分行關鍵業務的單點故障</p> <p>b) 資料防洩漏 (DLP)異常行為，本應被阻止的資料未能被阻止。</p> <p>c) 擁有存取任何唯讀網域控制站 (RODC) 權限的特權帳戶不應存取網路上的任何其他電腦。</p> <p>d) 關鍵應用程式必須實施雙重認證 (2FA) 保護機制，防止僅透過使用者憑證存取這些應用程式</p> <p>e) 應確保服務帳號密碼不會以明文形式快取在伺服器網路裝置上。</p> <p>f) 應該在本機管理員、辦公室管理員、唯讀網域控制站管理員和網域管理員之間，以層級正確定義權限。</p> <p>The Offensive Security CIB team performed penetration test on the Taipei Office systems and noted some deficiencies including:</p> <p>a) SPoFs (Single Point of Failure), some have been identified at the infrastructure and networking level affecting CIB' s CFS (Client Facing Service), including some</p>	<p>總行會針對所有缺失進行覆核以確保銀行網絡系統之安全。</p> <p>All improvements to be reviewed and rectified by BBVA Madrid to make sure they do not compromise bank' s system security.</p>	<p>預定完成改善時間</p> <p>Expected remediation completion date</p> <p>a) 2026 Q2</p> <p>b) 2026 DLP replacment</p> <p>c) 2026 Q4</p> <p>d) 2026 Q1</p> <p>e) 總行已覆核完成</p> <p>f) 2026 Q1</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>that support the critical activities of the Taipei Branch.</p> <p>b) Anomalous behaviour was detected in the DLP , allowing cases of data not being blocked, when it should be blocked.</p> <p>c) Privileged accounts with access to any RODC (Read-Only Domain Controller) should not be used to access any other computer on the network.</p> <p>d) 2FA protection mechanisms must be implemented for critical applications, preventing access to them solely through user credentials.</p> <p>e) Ensure that service account passwords are not cached in clear text on servers network devices.</p> <p>f) A correct definition of permissions should be made at the hierarchical level between Local Administrators, Office Administrators, RODC Administrators and Domain Administrators.</p>		

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