

# 美商美國銀行在臺分行內部控制制度聲明書

Bank of America N.A. Taiwan Branch

Statement of Internal Control

謹代表美國銀行在臺分行聲明本銀行於 108 年 1 月 1 日至 108 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（董事會/監察人/總行/區域中心，若兼營證券業務者，應增列：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）。經審慎評估，本年度各單位內部控制及法規遵循制度，除附表所列事項外，均能確實有效執行。

On behalf of Bank of America N.A. Taiwan Branch, we hereby certify that from January 1<sup>st</sup> to December 31<sup>st</sup>, 2019, 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. The Bank has been audited by independent auditors who submit reports to (board of directors / headquarter / regional office). (with respect to a bank which also engages in the securities business, the Bank has conducted evaluation of the effectiveness of the design and implementation of its internal control system in accordance with the criteria described in the “Regulations Governing the Establishment of Internal Control Systems by Service Enterprises in Securities and Futures Markets”, promulgated by the Securities and Futures Bureau, Financial

*Supervisory Commission*). After prudent evaluation, except for the items listed in the attached schedule, the Bank's each department has implemented effective internal control and compliance systems 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：

(簽章)

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

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總稽核／或負責臺灣區稽核業務之主管：

Auditor in charge of auditing on Taiwan Branch  
Audit Manager – Corp Audit Asia Pacific  
Wing Hang Ip

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(簽章)



臺灣區遵守法令主管：

Head of Compliance in Taiwan  
Mike Huang

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(簽章)



中 華 民 國 109 年 3 月 20 日

美商美國銀行在臺分行內部控制制度應加強事項及改善計畫  
(基準日： 108 年 12 月 31 日)

應 加 強 事 項	改 善 措 施	預 定 完 成 改 善 時 間
<p>本分行在防制洗錢及打擊資恐內部控制制度執行情形，有應加強事項，請詳本分行出具之防制洗錢及打擊資恐之內部控制制度聲明書。</p> <p>BANA Taipei has areas of improvement in AML / CFT space, for details please refer to the Statement of Internal Control for AML / CFT.</p>		