

美商富國銀行台北分行防制洗錢及打擊資恐內部控制制度聲明書

Wells Fargo Bank N.A. Taipei Branch

Statement on Internal AML/CFT Control

謹代表美商富國銀行台北分行聲明本分行於 111 年 1 月 1 日至 111 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，定期陳報董（理）事會及監察人/審計委員會/監事（會）。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 Wells Fargo Bank N. A. Taipei Branch, we hereby undertake that from 1/ January/ 2022 to 31/ December/ 2022 Taipei Branch 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 unit to conduct audit, and submitting the audit report periodically to the Company's Board of Directors and Supervisors/Audit Committee/Board of Supervisors. 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 unit of the Company 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

Undersigned:

在臺訴訟及非訴訟代理人：  ( 簽章 ) (Signature)

Benson Liou

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

總稽核 / 或負責臺灣區稽核業務之主管：  ( 簽章 )

(Signature)

Denis Menezes

Auditor in charge of auditing on Taiwan branch(es)

防制洗錢及打擊資恐專責主管：  ( 簽章 )

(Signature)

Vincent Huang

Chief AML/CFT Compliance Officer:

中 華 民 國 1 1 1 年 3 月 24 日

Date: 24 MARCH 2023

美商富國銀行台北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

Wells Fargo Bank N.A., Taipei Branch

Enhancement Items & Corrective Action for AML/CFT Internal Control System

( 基準日 : 111 年 12 月 31 日 )

(Closing Date: Dec 31, 2022)

@:此文件所列之應加強事項與相關改善措施均由富國銀行全球或亞太區域總部負責執行與落實；而所列之事項與措施將直接影響富國銀行台北分行。

@: Findings and CAs for these issues are owned by global Wells Fargo or Regional APAC Management and directly impact WFBNA Taipei Branch.

應加強事項 Issue Title@	改善措施 Corrective Action (CA) Title@	應加強事項完成 時限 Issue Due Date DD/MM/YYYY	改善措施完成 期限 CA Due Date DD/MM/YYYY	改善措施永續性自行檢 視時限 CA Sustainability End Date DD/MM/YYYY	應加強事項/改善措施執行情形 Issue / CA Status
I. 稽核項目: 俄國相關制裁管理作業稽核 (Report Rating – Needs Improvement, Issued 16/12/2022)					
I. Audit Title: Russian Sanctions Targeted Audit (Report Rating – Needs Improvement, Issued 16/12/2022)					
1. 針對 Executive Order (EO) 13662 名單在 Global Sanctions Management Operations System (GSMOS)執行關鍵字掃描(Keyword Suppress)時，系統運作結果無法確實符合應有的作業需要。(17691285) 1. Executive Order (EO) 13662 Keyword Suppress Global Sanctions Management Operations System (GSMOS) functionality does not function as expected (17691285) (Audit sourced - High)*	執行 Executive Order 13662 名單的關鍵字掃描 (Keyword Suppress)系統運作不符合應有的作業需要。 Executive Order 13662 Keyword Suppress sanction screening functionality does not function as expected (17691623)	15/11/2022	15/11/2022	30/12/2022	應加強事項與改善措施均已執行，有待稽核部門進一步檢驗 Issue Pending Validation / CA Pending Validation  *稽核部門檢視後確認由於台北分行沒有俄國或白俄羅斯的客戶，因此不會有因此應加強事項而產生遺漏制裁名單的情況發生。 *Audit verified that there were no missed sanctions hit as a result of this issue as there are no Taipei customers based in Russia or Belarus.