## 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110年1月1日至110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 2021 to 31 December 2021, the Bank has duly complied "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

#### 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

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

#### 臺灣區遵守法令主管:

Head of Compliance in Taiwan

潘廣斌 David Pan

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BI190-2

(106 生效版)

# 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:110年12月31日)

(Base Date: 31 December 2021)			
應加強事項	改善措施	預定完成改善時間	
Enhancement Items	Improvement Plans	Target Date	
1. 申報本會單一申報窗口,有未適時更新	1. 改善計畫及執行情形:	1. 本分行已於 110	
相關資訊者,如:分行申報「BI110 在	改善單位:行政部門	年 11 月 23 日完成	
台業務概述表」所報專撥在臺境內營運	本行呈報之報表均為最新資	改善。	
所用資金新台幣 1,153 百萬元,經查乃	料,並經主管確認無誤後,始得		
為108年1月28日之舊資料(上次更新	呈報,後續資料繳交仍將確保資		
日期為 109. 5. 14),惟本會銀行局已於	料之正確性。		
109.11.19 同意該行增加在臺營運所用	本次所查 BI110 表資料未更新		
資金為新台幣 1,827 百萬元,核有欠妥。	部份,已於110年7月5日完成		
	更新,後續於每年2月底前完成		
	更新呈報。		
Taipei Administration Department has not	Taipei Administration has	Improvement plan	
updated relevant information regarding the	completed to update the	was completed on	
working capital in the FEB website in a	information in the FSC's	November 23, 2021	
timely manner and FEB suggested Taipei	website and will process		
Administration needs to strengthen to ensure	annual update/review of the		
the correctness of the information submitted	information before the end of		
to the competent authority.	February each year.		
2. 本分行在防制洗錢及打擊資恐內部控制	2.請詳參本分行出具之防制	つまぜぬも八た山	
制度執行情形,有應加強事項,請詳本	洗錢及打擊資恐內部控制制	2.請詳參本分行出	
分行出具之防制洗錢及打擊資恐內部控	度聲明書。	具之防制洗錢及打	
制制度聲明書。	及年奶音。	擊資恐內部控制制	
		度聲明書。	
Taipei branch has areas of improvement in	Please refer to the Statement of	Please refer to the	
the Statement of AML&CFT Control.	AML&CFT Control for	Statement of	
	details.	AML&CFT	
		Control for details.	
		- 5. Wor for dotting.	

### 應加強事項 Enhancement Items

3. 辦理交易室門禁臨時進出之管理,進出卡有 未設定進出時間之情事,如:卡號: 14(代 號: BBVA1) 109年1月份及2月份均有多 次刷進出交易室之紀錄,經查係資訊人員以 員工卡設定可臨時進出交易室,雖有填列門 禁卡申請單,惟未設定進出日之可進出時 間,致交易室人員下班時該員亦有進出之權 限,不利交易室門禁之控管。

Taipei Administration handles the management of the temporary entry and exit card of the dealing room, and the entry and exit card has not set the time for the entry and exit. Taipei Administration and Operations needs to review the suitability of the access card settings for those (i.e. IT personnel) who apply for temporary access to the dealing room to facilitate the access control of the dealing room.

- 4. 辦理電腦系統資訊安全評估有下列事項 欠妥:
- (1). 有未依規定建構評估計畫、辦理法定 評估作業及出具評估報告,如:該分行資 訊安全作業主要由總行辦理,惟迄檢查結

### 改善措施 Improvement Plans

- 改善計畫及執行情形:
  改善單位:行政部門
  本行交易室門禁臨時進出管理
  如后:
- (1). 僅限本行授權之員工始得 進出交易室。
- (2). 非交易室人員,進出交易室 均須按鈴後,並由專人開門與完 成登記後,始得進入。

Taipei Administration has completed to setup the application procedures and management of temporary access card of the Taipei dealing room.

4. 改善計畫及執行情形: 改善單位:營運作業部

本行改善計畫:

(1). 總行在 105 年 3 月已依 「金融機構辦理電腦系統資

### 預定完成改善時間 Target Date

3. 本分行已於 110 年 10 月 13 日完成 改善。

Improvement plan was completed on October 13, 2021

4. 本行營運作業部 預計 111 年第 1 季 前完成電腦系統資 訊安全評估計畫及 報告並於同年 4 月

### 應加強事項 Enhancement Items

東日(110.5.24),尚未就分行所涉電腦系統,依「金融機構辦理電腦系統資訊安全 評估辦法」建構評估計畫、辦理法定資 作業及出具評估報告,不利瞭解各項資 循「金融機構辦理電腦系統資訊安全 循「金融機構辦理電腦系統資訊等5條 辦法」第3條建構評估報告之規定 項目、第8條出具評估報告之規定。 (2).108年1至12月及109年6月作業部 門辦理法令遵循自行評估作業,有未就「金融機構辦理電腦系統資訊安全評估辦法」 融機構辦理電腦系統資訊安全評估辦法」 之執行情形辦理評估,致本次檢查發現尚 未依前揭規定辦理,作業核欠妥適。

The following items are improper in handling information security of computer system:

- (1). Taipei operations did not setup an evaluation plan, handle evaluation tasks and issue evaluation reports of information security of computer system.
- (2). When Taipei operations conduct the self-assessment, operations did not conduct the evaluation of the implementation of the information security of computer system. Taipei operations need to enhance the implementation of the self-assessment on information security of computer system.

### 改善措施 Improvement Plans

訊安全評估辦法」規定建構評估計畫、辦理法定評估作業及出具評估報告。評估作業項目包含:

- (一)資訊架構檢視
- (二)網路活動檢視
- (三)網路設備、伺服器及端 末設備等設備檢測
- (四)網路設備及伺服器等設 備且連線
- (五)安全設定檢視
- (六) 合規檢視

行評估作業。

(七)社交工程演練 本行電腦系統資訊安全評估 由符合資訊安全相關資格之 評估後均無缺失項目。 總行預計於111年第1季前依 「金融機構辦理電腦系統員 110評年度評估報告。 (2),本行會於第一項之評估 報告收到後納入111年度 運作業部門辦理法令遵循自

(1). BBVA HO had processed the evaluation and audit of Taipei branch's information security of computer systems in March 2016 and the evaluation report provided by BBVA HO mentioned Taipei branch's information security of computer systems met the Taiwan relevant requirements of information security and there were no missing items. BBVA HO will issue the 2021 evaluation report of information security of

## 預定完成改善時間 Target Date

30 日前完成法令 遵循自行評估作 業。

Taipei operations will provide the evaluation plan and report of information security of computer system before the 1<sup>st</sup> Quarter of 2022 and complete self-assessment on information security of computer system before April 30, 2022.

應加強事項	改善措施	預定完成改善時間
Enhancement Items	Improvement Plans	Target Date
	computer system before the	
	first quarter of 2022 in	
	accordance with the Taiwan	
	relevant requirements.	
	(2). After receiving the 2021	
	evaluation report from BBVA	
	HO, Taipei operations will	
	include the above evaluation	
	report of information security	
	of computer system in the	
	self-assessment.	