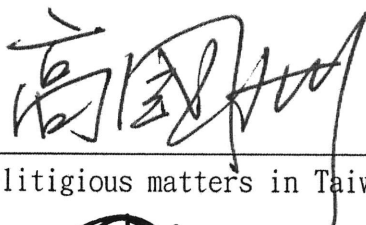



西班牙對外銀行臺北分行
防制洗錢及打擊資恐內部控制制度聲明書
BBVA Bank, Taipei Branch
Statement of AML/CFT Control

謹代表西班牙對外銀行臺北分行聲明本行於110年1月1日至110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，定期陳報總行及區域中心。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，除附表所列事項外，均能確實有效執行。

On behalf of BBVA Bank, Taipei Branch ("the Bank"), we hereby undertake that from January 1st to December 31st, 2021, the Bank has duly complied with the relevant regulations governing Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT) in establishing an internal control system, implementing risk management, designating an independent and objective internal audit unit to conduct audit, and submitting the audit report periodically to the Headquarter/Regional Office. 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.

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：高國洲  (簽章)
Representative of litigious and non-litigious matters in Taiwan/Country
Manager: James Kao

負責臺灣區稽核業務主管：  (簽章)
Regional Audit Head in charge of auditing on Taipei Branch:
Pedro Alonso Rubio

防制洗錢及打擊資恐專責主管：潘廣斌  (簽章)
Head of AML/CFT Officer in Taipei Branch: David Pan

中 華 民 國 1 1 1 年 3 月 31 日

西班牙對外銀行臺北分行
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
BBVA Bank, Taipei Branch
Enhancement Items and Improvement Plans for AML/CFT
Internal Control System
(基準日：110 年 12 月 31 日)
(Base Date: 31 December 2021)

應加強事項 Enhancement Items	改善措施 Improvement Plans	預定完成改善時間 Target Date
<p>分行對疑似洗錢或資恐交易態樣，有下列事項欠妥：</p> <p>1. 分行所訂疑似洗錢或資恐交易態樣，對交易監控政策及程序，有未將監控型態之參數設定予以書面化，如：分行辦理帳戶或交易之持續監控作業，訂有「態樣一（七）存款帳戶密集存入多筆款項達特定金額以上或筆數達一定數量以上，且又迅速移轉者。」，及「態樣一（十）客戶每筆存、提金額相當且相距時間不久，並達特定金額以上者。」，雖已明訂「特定金額」為新台幣 50 萬元(含等值外幣)，實務作業於逐筆存、匯款交易註明交易性質，惟尚未分別就態樣一(七)之「筆數達一定數量」，及態樣一（十）「相距時間」予以明確定義，不利落實遵循「金融機構防制洗錢辦法」第 9 條第 4 款之規定。</p> <p>2. 分行對疑似洗錢或資恐交易態樣之監控，逕增列「稅務洗錢類-申請開立法人帳戶，而無實質商業營運之公司，均予以特別審核，加強控管」之態樣，惟未納入所訂「疑似洗錢或資恐交易態樣」管理，核與「金融機構防制洗錢辦法」第 9 條第 5 款「應依其業務性質，…增列相關之監控態樣」規定不符。</p> <p>1. When Taipei Operations conducts the daily check of red flags re unusual activities and/or</p>	<p>改善計畫及執行情形： 改善單位：營運作業部</p> <p>1. 本行已於 110 年 8 月修訂「西班牙對外銀行台北分行對疑似洗錢或資恐交易態樣監控之作業程序」，在疑似洗錢或資恐交易態樣監控日報表及月報表之內容已明確定義態樣一(七)之「筆數達一定數量」，即「14 個營業日內達 10 筆以上且非因與本行交易往來相關」及態樣一（十）「相距時間」，即「三個營業日內」，以上定義乃遵循「金融機構防制洗錢辦法」第 9 條第 4 款對交易監控型態之參數設定予以書面化之規定。</p> <p>2. 本行修訂之「西班牙對外銀行台北分行對疑似洗錢或資恐交易態樣監控之作業程序」已將「稅務洗錢類」納入「疑似洗錢或資恐交易態樣」管理，亦即對於完成開戶達一年以上且未承作任何交易之客戶，若往後該客戶與本行進行交易，本行將辨識該客戶是否有稅務洗錢之交易態樣（如：不尋常之金流等），並予以強化控管。</p> <p>綜上所述，本行於 110 年 9 月 1 日依前述修定之作業程序辦理疑似洗錢或資恐交易態樣監控作業。</p> <p>1. Taipei Operations has completed to amend the Operational procedures for monitoring of re unusual</p>	<p>已於 110 年 11 月 23 日完成改善。</p> <p>Improvement plan was completed on November 23, 2021.</p>

<p>應加強事項 Enhancement Items</p>	<p>改善措施 Improvement Plans</p>	<p>預定完成改善時間 Target Date</p>
<p>suspicious transactions and issues the monthly report based on the transactions monitoring, Taipei operations did not clearly defined the number and duration of transactions in the operational procedures.</p> <p>2. In addition, the operational procedures do not include the management of "tax money laundering". Taipei operations need to include aforementioned observations in the Taipei operational procedures.</p>	<p>activities and/or suspicious transactions (red flags report) which included the definition of the number and duration of transactions and description of tax money laundering in the aforementioned operational procedures.</p> <p>2. Based on the above, Taipei Operations starts to apply the amended Operations procedures for daily check of red flags re unusual activities and/or suspicious transactions on September 1st, 2021.</p>	