

日商瑞穗銀行在臺分行

防制洗錢及打擊資恐內部控制制度聲明書

Mizuho Bank, Ltd. Taiwan Branch(es)

Statement on Internal AML/CFT Control

謹代表日商瑞穗銀行在臺分行聲明本公司於民國109年1月1日至109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，定期陳報總公司授權人員。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 Mizuho Bank, Ltd. Taiwan Branch(es), we hereby undertake that from January 1<sup>st</sup>, 2020 to December 31<sup>st</sup>, 2020, our company 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 authorized person of the headquarter. 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 department of the Bank 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

To: Financial Supervisory Commission

聲明人

Undersigned

總經理：木原武志

木原武志 (簽章)

General Manager

總稽核/稽核主管：手島猛

手島猛 (簽章)

Auditor in charge of auditing in Taiwan

防制洗錢及打擊資恐專責主管：孫以凡

孫以凡 (簽章)

Chief AML/CFT compliance officer in Taiwan

中 華 民 國 110 年 4 月 9 日

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

(基準日：民國109年12月31日)

應加強事項	改善措施	預定完成改善時間
<p>經外部稽核查核發現以下事項待改善：</p> <p>1.開戶、貿易融資、應收帳款承購業務以及定審作業之姓名檢索，發現有姓名檢核 hit 中資料庫名單後，經辦對於以現存選項無法明確說明判斷原因者，未將判斷原因詳細繕打說明。</p> <p>It is observed by external audit that the deposal reasons of the name hits were not sufficiently recorded when conducting name screening of customer onboarding, trade finance, factoring and periodic review since the operators only fill in the false hit reasons by the limited choices in the drop-down menu.</p>	<p>本行區域總部於民國109年12月進行 AML monitoring 時，已將此情形列為建議改善事項。本行已採取改善措施，於今年3月的洗錢防制研修中，對全行進行教育訓練，宣導同仁若判斷原因以現存選項無法明確說明，應使用自行繕打的方式，將判斷原因詳細記載。</p> <p>Same issue was observed by our regional office during the AML monitoring in Dec 2020. Counter measures were taken in annual mandatory training and were delivered to all staffs in Mar 2021. It is required to manually input the details of judgement if the existing choices in the drop-down menu cannot clearly state the deposal reasons of the name hits.</p>	<p>已於民國110年3月底完成改善。</p> <p>Remediation was completed by end of Mar 2021.</p>
<p>2.貿易金融業務使用之「貿易金融 AML/CFT 態樣檢核表」，對疑似洗錢或資恐交易態樣，依風險基礎方法設立偵測門檻而有未留存評估記錄以及在表單設計與實際執行上有不一致而易產生誤解之情形。</p> <p>It is observed that the bank failed to keep the assessment record regarding the threshold settings of the trade finance AML/CFT checklist. There is also an inconsistency between the statement of checklist and the actual practice.</p>	<p>針對前述態樣，本行將依風險基礎法重新檢視偵測門檻並留存相關評估紀錄。針對檢核表設計與實際執行上不一致的地方，本行亦將修改「貿易金融疑似洗錢或資恐態樣檢核表」表格，以維持設計與執行有效且一致。</p> <p>We will reassess the settings of the threshold and keep the relevant record. For the inconsistency between the design of checklist and the practice, we will also revise the checklist to ensure the effectiveness.</p>	<p>預計於民國110年9月底完成改善。</p> <p>Issue is on track for remediation by end of Sep 2021.</p>