

CTBC Global Anti-Money Laundering/Countering the Financing of Terrorism Policy Statement

中國信託商業銀行全球防制洗錢/打擊資助恐怖主義政策聲明

CTBC Bank Co., Ltd. (“CTBC” or “the Bank” are used interchangeably) is committed to assisting in the fighting against money laundering (“ML”), including the combating of terrorist financing (“TF”), by operating an effective risk based ML/TF prevention and detection framework.

中國信託商業銀行(以下稱「中信銀」或「本行」)一直以來致力於防制洗錢及打擊資助恐怖主義，運用以風險導向為本的洗錢/資助恐怖主義活動之防制與偵測架構，以落實防制洗錢及打擊資助恐怖主義。

This AML/CFT global policy (“Global Policy”) sets out the minimum standards for all business units in Head Office, local and overseas branches and subsidiary banks (“the Bank Group”) to comply with domestic and international practices and regulations when dealing with money laundering and terrorism funding activities.

為遵循本地法規與國際慣例，本防制洗錢與打擊資助恐怖主義全球政策(以下稱「本政策」)為總行、國內分行、海外分行及子行(以下稱「中信銀集團」)所有業務單位，設立防制洗錢與打擊資助恐怖主義(以下稱「AML/CFT」)活動的最低標準。

The Global Policy includes :

本政策包含：

- The Board of Directors and the Senior Management of the Bank Group are ultimately responsible and accountable for ensuring the Bank Group’s compliance with the laws, regulation and guidelines for the prevention of money laundering and financing of terrorism, and where necessary, take remedial action when breaches occur. The Board of Directors and the Senior Management of the Bank Group should endorse and support the Global Policy. They should provide overall strategic direction for the AML/CFT program to be managed in accordance with their respective terms of reference;
中信銀集團的董事會與高階管理層，對確保集團在遵循法律、規範及準則以防制洗錢及打擊資助恐怖份子，負有最終責任，並應於違法行為發生時依據必要性採取補救措施。董事會及高階管理層應認可且支持本政策，並依各自之管理權責對 AML/CFT 相關計畫提供整體性之策略方針;
- To ensure and boost the BOD and the Senior Management’s governance of the Bank’s AML/CFT mechanism, the AML Oversight Committee (“AMLOC”) should

be established. The AMLOC shall assist the Board of Directors and the Senior Management in fulfilling its oversight responsibility over the Bank's compliance management aimed at ensuring that the Bank maintains an effective AML/CFT control structure;

為達董事會高階管理層對銀行防制洗錢及打擊資助恐怖份子相關計畫有效廣泛的監督，銀行成立總機構防制洗錢委員會。該委員會目的為協助董事會和高級管理人員在履行其對銀行的法遵管理監督責任，以確保銀行維持有效的 AML/CFT 的管控機制;

➤ **The prohibition of the following products, services and customer types:**

受禁止的產品、服務及客戶類型：

- **A shell bank or financial institution**
空殼銀行或金融機構
- **Are involved in criminal or terrorist activities, or support criminal or terrorist organisations;**
涉及犯罪、恐怖活動，或支持犯罪或恐怖組織
- **Are prohibited according to prevailing law or as a result of applicable sanctions and embargoes both locally and internationally**
因國內外法律或制裁、禁運規定而被禁止者
- **anonymous accounts or accounts in fictitious names**
任何匿名或偽名之帳戶
- **Payable-through accounts ("PTA")**
過渡帳戶

➤ **Advocate the risk-based approach to carry out the Customer Due Diligence ("CDD"). The program, which incorporates Customer Identification and Verification, differing levels of due diligence (CDD processes) and measures (prevention & mitigation) are to be observed depending on the particular risk category of the business relationships assessed by a series of risk ranking criteria;**

以風險為基礎的方法從事客戶盡職調查（“CDD”）程序，該程序結合了客戶識別和驗證，視業務關係，風險類別決定不同程度的審查程序(客戶審查程序)及管理措施(防制/減低風險)，該風險類別係經由一系列的風險評等標準加以評估;

➤ **Conduct enhanced due diligence ("EDD") on customers assessed as higher risk, such as Politically Exposed Persons ("PEPs"), includes the immediate family members and close associates of such a person, as well as corporations,**

businesses or other entities formed by or for the benefit of such a person;
客戶被評定為高風險者須進行加強盡職調查，例如擔任重要政治職務之人士，範圍涵蓋近親家庭成員、重要關聯人以及以該等人之利益或為該等人之利益所設立的公司或企業；

- **Based on the risk-based approach to perform the periodically review to ensure CDD information is up-to date;**
依據客戶風險等級定期檢視帳戶資訊，以確保客戶資訊符合現況；
- **Monitor customer accounts and look out for unusual or suspicious activities, and promptly raise and report suspicion to local financial intelligence unit (“FIU”);**
監控客戶帳戶有無任何不尋常或可疑之交易活動，並依法即時地向所在地金融調查單位提出可疑交易申報；
- **Maintain and retain documentation on all its business relations and transactions with its customers. The retaining period and storage form must comply with local requirements;**
保存與客戶間所有業務關係和交易之紀錄，且應保存相關文件正本。該紀錄保存需符合當地金融監理規定及主管機關規範；
- **Structured AML/CFT training is compulsory for ALL staff comprising both generic and customized training modules.**
所有行員均應參與 AML/CFT 相關教育訓練課程，包含一般性課程與視需求而量身訂做之規劃課程。

