

美商富國銀行台北分行內部控制制度聲明書

Wells Fargo Bank N.A. Taipei Branch

Statement of Internal Control

謹代表美商富國銀行在臺分行聲明本銀行於111年01月01日至111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」、外國銀行及大陸地區銀行在臺分行適用「金融控股公司及銀行業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，定期陳報董（理）事會/監察人/總行/區域中心，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。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 Wells Fargo Bank N.A. Taipei Branch, we hereby certify that from 1/ January/ 2022 to 31/ December/ 2022 the Bank has duly complied with the “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. The Bank has duly complied with the subparagraph 5, Article 38 and Article 38-1 of above Implementation Rules, and the information security self-disciplinary regulations specified by the Banks Association of the ROC. The Bank has been audited by independent auditors who submit reports to (*board of directors*

/ 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, compliance systems and overall information security implementation 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

聲明人

Statement by

在臺負責人：



(簽章) Signature

Benson Liou,

Responsible Person in Taiwan

臺灣區法令遵循主管：



(簽章) Signature

Vincent Huang,

Head of Compliance in Taiwan

總稽核 / 或負責臺灣區稽核業務之主管：




(簽章) Signature

DENIS ROHAN MENEZES

Auditor in charge of auditing on Taiwan branch(es)

負責臺灣區資訊安全主管：



(簽章) Signature

Josiah Wong,

Chief Officer in charge of information security on Taiwan branch(es)

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 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: 富國銀行台北分行一般性稽核 (Report Rating – Effective, Issued 27/09/2022)					
I. Audit Title: APAC – WFBNA Taipei Branch Audit (Report Rating – Effective, Issued 27/09/2022)					
1. 針對富國銀行在亞太區所使用的 International Business Information System (IBIS) 應用程式的風險控管需要，缺乏迅速有效的回應 (17505498) 1. Lack of a business resiliency response for legacy International Business Information System (IBIS) application in APAC (17505498) (Audit sourced - High)	各部門應記錄審視相關風險的過程，並取得Risk and Control Committee (RCC) 的正式核准。 Document and gain approval of Risk Acceptance by relevant Risk and Control Committee (RCC) (17505500)	31/01/2023	31/01/2023	03/03/2023	應加強事項與改善措施均已落實執行*。 Issue Closed / CA Completed* *稽核部門觀察到，雖然相關部門在使用此陳舊系統時已把應注意風險上呈至適當層級，但並未記錄相關的審視過程及保存正式文檔。亞太管理團隊同意記錄及保存審視過程文檔的重要性，並據此提出改善措施。相關部門應記錄審視相關風險的過程，並取得Risk and Control Committee (RCC)的正式核准。(Risk acceptance record 17820000)。WFBNA臺北分行管理及控制委員會 (MCC) 亦於2022年11月22日的會議上確認對此應加強事項與相關改善措施，均應配合辦理與遵

					<p>循。總行企業及投資銀行 (CIB) 風險與控制委員會 (RCC) 亦於2023年2月2日根據Enterprise Risk Acceptance Policy追認此一IBIS相關的風險控管需求。</p> <p>*This is an Internal Audit raised issue where audit observed that whilst this risk had been appropriately escalated, formal risk acceptance had not taken place. Management agreed that a risk acceptance was appropriate and documented a CA stating that a risk acceptance would be raised (Risk acceptance record 17820000). This was noted in the WFBNA Taipei Branch Management and Control Committee (MCC) Meeting on 22/11/2022 and risk-accepted by the Corporate and Investment Banking (CIB) Risk and Control Committee (RCC) on 02/02/2023 in line with the Enterprise Risk Acceptance Policy.</p>
<p>2. 完整識別並記錄Shared Risk Platform (SHRP) 所羅列且適用於富國銀行亞太區業務的控制程序表列 (9583355)</p> <p>2. Identify and document business-specific controls in Shared Risk Platform (SHRP) for the International Regions (9583355) (Audit reported Business Identified Issue (BII) – High)#</p>	<p>國際控制部門將會針對羅列於SHRP中的監控程序表列做一個全面性的檢視。依此，彙整所有需要更新的監控內容並送交亞太區法規遵循部作記錄更新。(9586518)</p> <p>International Control will complete a comprehensive review of the related controls in SHRP, prepare required updates, and submit to Regional Compliance for</p>	14/04/2023	14/04/2023	26/05/2023	<p>應加強事項與改善指示均依既定進度持續追蹤中</p> <p>Issue Open – On Track / CA Open – On Track</p> <p>#稽核部門在執行此次查核過程中，同時審視了富國銀行全球各業務部門自行上報的風險事件表列，並評估了該事件對臺北分行的影響。雖然各部門的管理階層並未據此表列項目訂定控管程序，稽核部門在評估後並未發現臺北分行在相關業務活動的控制執行上有任何缺失。由於各事業單位的管理階層並未據此表列項目訂定控管程序，因此稽核單位針對該等高風險之表列項目歸納整理出適用於臺北分行業務範圍的控制後，據此對臺北分行執行相關審查與測試。測試結果顯示臺北分行在相關業務活動的控制執行上，並未有任何缺失。</p> <p>#Audit reviewed the outstanding global high rated BII and assessed its impact on the WFBNA Taipei Branch audit. While Management has not defined a Front Line (FL) inventory of</p>

	input into SHRP (9586518)				controls, Audit identified and tested controls in place to support the activities of the Taipei Branch and no exceptions were noted by Audit. As such, based on the results of Audit's work and as no exceptions were identified, the impact of this issue to this engagement is moderate.
II. 稽核項目: 富國銀行亞太區總部的第三方風險管理 (Third Party Risk Management) 作業稽核 (Report Rating - Weak, Issued 01/11/2022)					
II. Audit Title: APAC Third Party Management (Report Rating - Weak, Issued 01/11/2022)					
1. 缺乏合宜的第三方風險治理架構以確保亞太區第三方風險管理符合相關法規的要求。(17751179) 1. Lack of a third-party risk management framework to comply with APAC regulatory requirements for third-party chain outsourcing (17751179) (Audit sourced - High)	針對由富國銀行內部聯行與第三方建立的作業委託關係，亞太區域總部必須建立一套並且能被執行的綜管程序。(17751492) Develop and implement a regional oversight process for third parties engaged by affiliates (17751492)	15/06/2024	15/06/2023	15/01/2024	應加強事項與改善指示均依既定進度持續追蹤中 Issue Open – On Track / CA Open – On Track
	針對與富國銀行內部聯行有作業委託關係的服務供應商，亞太區域總部將進行一次性的全面審視。(17751493) Complete a retrospective review of existing vendors engaged by affiliates (17751493)	15/06/2024	15/02/2024	15/03/2024	應加強事項與改善指示均依既定進度持續追蹤中 Issue Open – On Track / CA Open – On Track
	即時更新委外作業列表。(17751494)	15/06/2024	15/06/2024	15/11/2024	應加強事項與改善指示均依既定進度持續追蹤中 Issue Open – On Track / CA Open – On Track

Update outsourcing registers (17751494)					
亞太區域總部將按照亞太區域所有與第三方風險管理相關的法規，建立並記錄完整的法規表列。 (17758664) Document APAC outsourcing regulatory requirements (17758664)	15/06/2024	13/01/2023	28/08/2023	應加強事項依既定進度持續追蹤中/改善措施相關的控管機制已經被驗證為有效，惟改善措施的永續性驗證尚在進行中。 Issue Open – On Track / Control Design successfully validated, pending sustainability testing.	
亞太區域總部將把富國銀行總行的Enterprise Third-party Risk Management Policy與亞太區第三方風險管理相關的法規進行差異分析。 (17758665) Complete a gap analysis between the Enterprise Third-party Risk Management Policy and APAC outsourcing regulatory requirements (17758665)	15/06/2024	31/03/2023	31/08/2023	應加強事項與改善措施均依既定進度持續追蹤中 Issue Open – On Track / CA Open – On Track	
針對目前所設立第三方風險管理作業的控制程序，	15/06/2024	14/04/2023	15/05/2023	應加強事項與改善措施均依既定進度持續追蹤中 Issue Open – On Track / CA Open – On Track	

	<p>亞太區域總部將把目前所設立第三方風險管理作業的監控程序與亞太區域第三方風險管理相關的法規進行差異分析(17758666)</p> <p>Complete a gap analysis between existing controls and APAC outsourcing regulatory requirements (17758666)</p>				
<p>2. 在全球尚未設立如何執行第三方作業風險控管的跨國協同機制。</p> <p>2. Global engagement models have not been defined to support the execution of certain Operational Risk Programs (1174037) (Audit reported BII – High)^</p>	<p>在美國本土之外需要建立一套能完整辨識相關作業風險的平台，以確保能確實執行永續的作業風險管理活動。(1174079)</p> <p>Conduct end-to-end verification activities to demonstrate sustainable performance of the Operation Risk platform for non-U.S. regions (1174079)</p>	29/04/2022	29/04/2022	31/10/2022	<p>應加強事項與改善措施均已落實執行</p> <p>Issue Closed / CA Completed</p> <p>^此一在富國銀行全球事業單位所自行回報的風險事件表列中，風險評等被列為高的項目，在如何記錄角色和權責以管理重大作業風險（包括第三方風險）方面，綜管亞太區和綜管全球的團隊，有不一樣的作業程序。稽核認為，這一全球性問題對亞太地區第三方風險管理的影響不大，因為它更廣泛地適用於作業風險管理框架，TPM是其中的一小部分。</p> <p>^The high rated BII relates to gaps in documenting roles and responsibilities for regional and global teams managing key operational risks including third-party risk. Audit assessed this global issue as moderate impact for APAC Third Party Management (TPM) due to its broader applicability to the operational risk management framework, of which TPM is a small component.</p>
<p>3. 缺乏能確實管理及保存第三方作業清冊的監控程序。</p>	<p>建立因第三方作業而衍生的顯著風險之治理控管機</p>	23/09/2023	31/01/2022	30/04/2022	<p>應加強事項依既定進度持續追蹤中/改善措施已落實執行。</p> <p>Issue Open – On Track / CA Completed</p>

3. Lack of controls to manage and maintain a complete Third Party inventory (13407201) (Audit reported BII – Moderate)	制。(13789551) Create governance controls to monitor changes in the risk materiality of third party engagements (13789551)				
	強化因第三方作業而衍生的顯著風險之報告控管機制。(13789555) Enhance reporting controls to identify changes in the risk materiality of third party engagements (13789555)	23/09/2023	30/09/2021	31/12/2021	應加強事項依既定進度持續追蹤中/改善措施已落實執行。 Issue Open – On Track / CA Completed
	在符合相關第三方作業法規的基礎上，設立第三方作業相關的委外作業清單。 Develop a strategic enterprise third party inventory (outsourcing register) which meets minimum regulatory requirements (13789558)	23/09/2023	23/09/2023	30/11/2023	應加強事項與改善措施均依既定進度持續追蹤中 Issue Open – On Track / CA Open – On Track
4. 關於在與富國銀行內部聯行有複委外作業安排時的應加強事項	數據模型將用作辨識從數據來源系統的數據流以追	27/10/2023	31/01/2022	21/02/2022	應加強事項依既定進度持續追蹤中/改善已落實執行。 Issue Open – On Track / CA Completed

(14866836) 4. Chain Outsourcing within Affiliate Arrangements (14866836) (Audit reported BII – Moderate)	縱系統數據的質量 (15166905) Data model/flow that will identify data movement from source system to Service Catalog for traceability of data quality issues (15166905)				
	清楚定義複委外時所須遵 循的要求(15167006) Define requirements for chain outsourcing (15167006)	27/10/2023	11/01/2022	25/01/2022	應加強事項依既定進度持續追蹤中/改善措施及其永續性驗證 已經完成。 Issue Open – On Track / CA Completed
	與富國銀行聯行建立的複 委外作業必須含括在 Global Delivery Activity (GDA) 的流程中 (18274029) Affiliate Chain Outsourcing within the Global Delivery Activity (GDA) Process (18274029)	27/10/2023	27/10/2023	28/10/2024	應加強事項與改善措施均依既定進度持續追蹤中 Issue Open – On Track / CA Open – On Track
	與富國銀行聯行建立的複 委外作業必須含括在Third Party Program 的流程中 (18274084)	27/10/2023	27/10/2023	28/10/2024	應加強事項與改善措施均依既定進度持續追蹤中 Issue Open – On Track / CA Open – On Track

Affiliate Chain Outsourcing within the Third Party Program Process (18274084)				
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