

防制洗錢及打擊資恐專區

行政院洗錢防制辦公室為加強向民眾宣導，持續執行全國性防制洗錢宣導工作。本專區資訊包含：

一、十五款電子海報：「因應洗錢防制民眾應配合客戶審查」、「誠實申報免遭海關沒入或受罰」、「洗錢防制專業總動員」、「縱容洗錢會流失比錢更重要的事」、「金流透明犯罪現形」、「洗錢防制黑錢收網」、「支持洗錢防制，多一道守門員，多一層財產保障」、「出境入境，誠實申報」、「防制洗錢，全員到齊」、「防制洗錢，國家向前」、「傻傻當人頭當成冤大頭」、「客戶詳審查金流有保固」、「冒險當車手錢入他人手」、「公司申報新制度」及「頭家快報」宣傳文宣等。

二、九份宣導海報：「洗錢防制為哪樁」、「為何妳的朋友都是檢察官」、「層層把關打破洗錢循環」、「勿落入洗錢幫兇的陷阱」、「謹慎使用支付平台」、「線上博弈儲值代幣小心成為幫兇」、「遊戲點數安全嗎?」、「虛的"更要注意"」、「出入境誠實申報篇」。

三、宣傳短片/宣傳廣播：

1. 金融機構守門員篇 (30 秒)：<https://www.youtube.com/watch?v=QckOg1rIBio>
2. 金融機構守門員篇 (90 秒)：<https://www.youtube.com/watch?v=Yxl-MDjcoSY>
3. 可以幫我洗個東西嗎？
<https://www.youtube.com/watch?v=cCCnzyBVTYw&app=desktop>
4. 洗黑錢篇 (78 秒)：<https://www.youtube.com/watch?v=1B2PaKPgfls>
5. 洗錢防制大使陳美鳳篇 (90 秒)：
<http://www.amlo.moj.gov.tw/lp.asp?CtNode=45715&CtUnit=18536&BaseDSD=7&mp=8004&nowPage=1&pagesize=30>
6. 陳美鳳呼籲勿當人頭篇-廣播 (30 秒)：
<http://www.amlo.moj.gov.tw/ct.asp?xItem=524067&ctNode=45713&mp=8004>
7. 頭家快報篇 (30 秒)：https://www.youtube.com/embed/Q_ntRfmZ68k
8. 王董篇 (30 秒)：<https://www.youtube.com/embed/2RuzlbXkB0M>
9. 企業誠信治理暨反貪腐、反洗錢-短版 (30 秒)：
https://www.youtube.com/watch?v=Tp10_-rDaro
10. 企業誠信治理暨反貪腐、反洗錢-長版 (66 秒)：
<https://www.youtube.com/watch?v=Ec9oblciWi98>

11. 洗錢防制宣導短片--虛擬貨幣實名制#郭焯淳篇
<https://www.youtube.com/watch?v=K-mKmqlYoes>
12. 洗錢防制宣導短片--網路詐騙洗錢防制#羅嘉翎篇
<https://www.youtube.com/watch?v=sLiyoCJ1ui0>
13. 洗錢防制宣導短片--陳淑芳-大眾篇
<https://www.youtube.com/watch?v=AyCoF4p1XEU>
14. 洗錢防制宣導短片--陳淑芳-虛擬貨幣篇
<https://www.youtube.com/watch?v=z77119Q1jeM>
15. 洗錢防制宣導短片--陳淑芳-線上遊戲篇
https://www.youtube.com/watch?v=n_Wv1fIOOLk
16. 洗錢防制宣導短片--柴語錄-簡短版
<https://www.youtube.com/watch?v=Pku4W5wbBq4>
17. 洗錢防制動畫--柴語錄-完整版
<https://www.youtube.com/watch?v=MzEqJrgBqjl>
18. 洗錢防制宣導短片--二手車買賣#小施篇
<https://www.youtube.com/watch?v=gwaN8KTlpLY>
19. 2023 年洗錢防制動畫網路購物詐騙篇 V2. feat.柴語錄
<https://www.youtube.com/watch?v=seFra8lOrXU>
20. 2023 年洗錢防制動畫打工車手篇 V2 feat.柴語錄
https://www.youtube.com/watch?v=wPv_G7Wzpk&t=50s

四、防制洗錢及打擊資恐懶人包

五、1 分鐘看懂洗錢防制新法

六、The Wolfsberg Questionnaire

因應洗錢防制 民眾應配合客戶審查

重要政治性職務人士及其親友，應配合加強客戶審查



行政院洗錢防制辦公室
Anti-Money Laundering Office/Executive Yuan

地址 10048台北市中正區信義路一段3號5樓
傳真 (02) 2322 2680 電話 (02) 2322 2610 網址 www.amlc.moj.gov.tw/



誠實申報 免遭海關沒入或受罰

誠實な申告 侵害または罰から
Honest declaration
From confiscation or punishment



新臺幣逾10萬元
台灣ドル10万円以上
Maximum NT\$100,000.

人民幣逾2萬元
人民幣20,000まで
Limit of RMB\$20,000.

黃金逾2萬美元
黃金總額で米ドル20,000まで
Gold total value not exceeding US\$20,000.

外幣逾等值1萬美元
外貨現金及び有価証券の総額が1万USD相当以上
Amounts exceeding US\$10,000, or the equivalent in other currencies, must be declared to Customs.

有價證券逾等值1萬美元
換算する有価証券の総額が1万米ドルに達する場合、税関審査を受ける必要があります
Negotiable securities with a face value equivalent to US\$10,000 or more must be declared to Customs.

鑽石、寶石或白金逾等值新台幣50萬元
且超越自用目的
金/プラチナ/ダイヤモンド/宝石類は合計50万TWD相当以上の
自身目的を超えたもの
Diamonds, precious stones or platinum equivalent to
NT\$500,000 or more, not for personal use.

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洗錢 防制

專業總動員

以下職業需負責客戶審查、交易紀錄保存及申報可疑交易的義務。

| | | | |
|------|----------|--------|----|
| 金融機構 | 銀樓業 | 地政士 | 律師 |
| 公證人 | 會計師 | 不動產經紀業 | |
| 記帳士 | 記帳及報稅代理人 | | |



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縱容洗錢 會流失比錢更重要的事

競爭力 自由度 公信力



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金流透明 犯罪現形

黑錢來自毒品，貪污，詐欺，吸金等犯罪所得
全民防制洗錢，國家金流透明，臺灣幸福美好



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Anti-Money Laundering Office, Executive Yuan

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洗錢防制 黑錢收網 勿當犯罪車手



行政院洗錢防制辦公室
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支持洗錢防制

多一道守門員 多一層財產保障



依據洗錢防制法規定，金融機構受理開戶或交易應落實確認客戶身分，是遏止不法金流的第一道防線，民眾的配合可防杜非法洗錢，更可保障自身財產安全。

健全臺灣金融環境 保護你我財產安全



出境入境 誠實申報

Honesty Is The Best Cross-Border Policy



通關攜帶下列物品 應誠實申報

Travelers carrying the following items shall make declaration.

| | |
|--|--|
| 新臺幣現鈔 NTD | 面額超過Over 100,000 |
| 人民幣現鈔 RMB | 面額超過Over 20,000 |
| 外幣現鈔 香港、澳門、台灣之貨幣 Foreign Currency (Hong Kong and Macau) | 總面額或總價值逾 等值10,000美金 Over the equivalent of USD 10,000 |
| 有價證券 Bearer Negotiable Securities | |
| 黃金 Gold | |
| 有被利用進行 洗錢之虞之物品 Items might be used for money laundering | 一定金額以上 Over Certain Threshold |

◆未申報及申報不實會被**沒入**，或處以**罰鍰**。
Failure to declare in full, the undeclared will be
confiscated or fined.

◆**貨物運送、快遞、郵寄**亦同。
Delivery via shipment, express delivery,
or mail, is also required.

洗錢防制 全民一致



防制洗錢 全員到齊



除金融機構外，下列指定之非金融事業或人員，依據洗錢防制新制，負有客戶審查、交易紀錄保存及申報可疑交易義務

(1)銀樓業

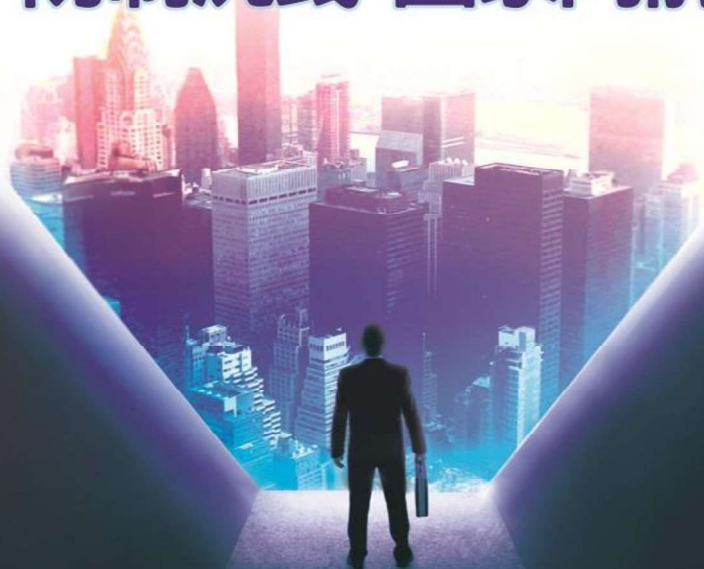
(2)地政士及不動產經紀業從事不動產買賣相關行為

(3)律師、公證人、會計師為客戶準備或從事特定交易時，
例如買賣不動產或管理金錢、證券或其他資產等

擴大防護範圍 健全金流秩序



防制洗錢 國家向前



法 制 監 理 執 法

接軌國際規範 重建金流秩序



姊說....

傻傻當人頭
當成冤大头



安心5撇步

- 1.遺失存摺或提款卡，立馬掛失。
- 2.不因求職而交出帳戶。
- 3.不將個人帳戶借給親友使用。
- 4.不出借個人帳戶、提款卡、密碼給他人。
- 5.不因申辦貸款，任意把帳戶、提款卡、密碼交給陌生人代辦。

洗錢防制大使



洗錢防制大使

洗錢防制

客戶審查詳實 金流安全保固



冒險當車手 錢入他人手

當了車手就有罪 他人賺飽卻脫罪



擔任詐騙集團洗錢車手，
一旦遭緝捕，一罪一罰，
最高可判 **30** 年徒刑。



公司申報新制度 洗錢防制有保障

CTP 公司負責人及主要股東資訊申報平臺
Company Transparency Platform

107年11月1日即可申報!

申報 指南

公司應主動申報之資訊

- ◆ 董事
- ◆ 監察人
- ◆ 經理人
- ◆ 股東(持股或出資額超過10%)

未依規定申報，依法可罰5-50萬元罰鍰



如何做? 請點我



馬上做! 請點我

洗錢防制大使

陳水扁

客服諮詢專線
412-1166

可直接撥打，不須加撥區碼，行動電話請加撥02，
六碼地區請撥41-1166
(服務時間：星期一至星期五8:30-17:30國定假日除外)

報快家頭

LIVE NEWS

BREAKING NEWS

公司法新制度上路，**公司資訊申報平臺**開始申報

首次申報時間：108/11/01~108/01/31

| Category | Percentage |
|----------|------------|
| 10% 股東 | 10% |
| 經理人 | 30% |
| 董事 | 20% |
| 監察 | 10% |
| 股東 | 10% |
| 股東 | 10% |
| 股東 | 10% |

LIVE NEWS

BREAKING NEWS

須至**公司資訊申報平臺**上網申報

董監事、經理人、持股或出資超過10%的股東

<https://ctp.tdcc.com.tw>

洗錢防制為哪樁？

國際上誰在反洗錢？

- ① FATF 國際洗錢組織為洗錢及打擊金融犯罪之主要防線國家組織
- ② AMLAT 亞洲洗錢及打擊金融犯罪組織
- ③ AMLC 亞太洗錢及打擊金融犯罪組織
- ④ APG 亞太防洗錢組織

APG 亞太防洗錢組織
APG 係由亞太地區之 15 個國家及地區之金融監管機構所組成，旨在打擊洗錢、資助恐怖主義及金融犯罪，並促進金融體系之穩定與健全。

為什麼台灣要參與反洗錢？

台灣的國際貿易地位崇高，
實需在國際間與主要經濟圈密切連結。

106年台灣貿易依存度超過100%，
產業結構以製造業為主，對貿易有非常高的需求。

台灣很早就有洗錢防制的觀念

- 1980年第一輪防制計畫，
評比為：相當完善的防制與立法。
- 1996年第二輪防制計畫，
評比為：法制缺欠，執法不足。
金融機構防制措施未落實，連續資金管制不佳，金融專業人員專業程度有限，台灣被列入一般避稅名單。
- 1999年導入國際防制名單。
- 106年通過洗錢防制法，
107年通過受眾2級防制評鑑。

大家還陣來！全民總動員

政府部門：金融機構、司法、非金融機構、金融市場、統一不可、公務。

金融機構：銀行、保險、證券、信託、期貨、基金、其他金融機構。

非金融機構：不動產經紀、律師、會計師、其他專業服務。

金融市場：股票、債券、期貨、基金、其他金融市場。

統一不可：統一不可。

公務：公務。

金流透明 世界好評+

財政部 國際內政司
行政院洗錢防制辦公室
AOL: Water Laundering Office/AMLAT

洗錢損國家經濟、防制保全民利益
支持洗錢防制、守護你我家園

勿落入洗錢幫兇的陷阱!

洗錢是什麼?

以非法手段（例如毒品、人口買賣...等）所獲得的金錢、財物、利益，需要透過合法金融作業轉化為乾淨、不被追蹤的錢，歹徒才敢拿來使用。

洗錢防制123

- 1 不輕易給陌生人個資
- 2 不輕易給他人自己的帳戶
- 3 不做打工車手，幫忙領錢



謹慎使用支付平台 杜絕洗錢不濫用



第三方支付工具有匿名性、快速性、金流追蹤之困難性及非面對面交易等特性，應小心使用，杜絕洗錢。



線上博弈儲值代幣 小心成為幫兇

犯罪集團可透過博弈網站，將不法所得與網站代幣合流，以製造追查斷點，玩家恐淪為洗錢幫兇。



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廣告

遊戲點數 「安全嗎？」



防制洗錢 Online
來路不明點數不要買

宣傳大使
陳淑芳

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廣告

虛的，
更要注意！

小心被騙！！

防制洗錢
虛擬資產要管理

宣導大使
陳淑芳

行政院洗錢防制辦公室
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出入境申報誠實 不會沒入或受罰

正しく申告し、没収と処罰を避けましょう。出入国に際し、以下を所持する場合は申告が必要です。
Honest declaration From confiscation or punishment



新臺幣限額10萬元
台灣ドルが10万台湾ドルを超える場合
New Taiwan Dollar > NTD100,000.



外幣逾1萬美元
1万米ドル相当を超える外貨
Foreign Currencies > USD10,000.



人民幣限額2萬元
2万円を超える人民元
Renminbi > CNY20,000.



有價證券面值逾1萬美元
1万米ドル相当を超える有價証券
Negotiable Securities > USD10,000.



黃金逾2萬美元
2万米ドル相当を超える金塊
Gold > USD20,000.



**鑽石、寶石或白金逾新臺幣50萬元
且超越自用目的**
50万台湾ドル相当を超える自己使用目的
以外のダイヤモンド、宝石、プラチナ
Diamonds, Gems and/or Platinum:
Over NTD500,000 and not for personal use.



宣導大使
陳淑芳



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洗錢防制
看守你我荷包

洗錢的定義

洗錢就是「清洗黑錢」，簡單說，是將不法犯罪所得，以各種方式合法化。



什麼是AML

Anti-Money Laundering 洗錢防制

要事前的預防洗錢，也要事後的追查洗錢，採取任何必要的措施和手段，全面防制洗錢犯罪。



擴大洗錢態樣 放寬犯罪門檻

除詐欺、販毒外

逃稅也正式納入洗錢的前置犯罪，
符合國際規範

以詐術或不正當方法逃漏稅捐，
依稅捐稽徵法規定移送外，
並依洗錢防制法追訴洗錢罪



逃稅的常見手段

營業稅漏開發票、跳開發票、虛報進項，取得虛設行號發表。

所得稅短報收入、浮報成本、虛報薪資、虛列費用、虛報扶養親屬。

遺產稅短、漏報或虛列債務。

印花稅未貼、少貼、撕下重貼印花稅票或貼用偽造的印花稅票。



逃稅不等於節稅

逃稅是犯罪行為，但是，如果只是因為疏忽而短繳稅捐，只需儘快主動申報、補繳稅額和利息，就不構成逃稅。

節稅，則是以法律賦予人民善用減輕稅捐的規定，來減輕納稅負擔，這是法律允許的行為，當然也不算是犯罪。



若為了逃稅 而進行上述行為，將觸犯《稅捐稽徵法》，並為洗錢的前置犯罪行為，會被移送司法單位偵辦。



逃稅的法律責任

民衆如果刻意逃稅，將觸犯稅捐稽徵法，屬刑事責任，可處5年以下有期徒刑、拘役或科或併科新台幣6萬元以下罰金。

教唆或幫助他人逃稅，則可能處3年以下有期徒刑、拘役、或科新台幣6萬元以下罰金。



總結

不管是逃稅，或是洗錢，都是犯罪行為

民衆切勿違背相關規定，以身試法



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1分鐘 看懂洗錢防制新法



行政院洗錢防制辦公室

*Anti-Money Laundering Office,
Executive Yuan*



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修正背景

國際接軌

近年因國際洗錢與資恐事件頻傳，我國自2007年以來洗錢防制法落後國際標準甚遠，且2018年將進行第三輪評鑑



國內司法實務

面臨防制洗錢不彰問題，如人頭型犯罪型態、人肉運鈔、吸金案件、跨境電信詐欺案層出，反映執法機關及邊境查緝困難



斷金流，遏止犯罪發生、追及犯罪利得
106年6月28日全新洗錢防制法上路

洗錢防制新法修正重點



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洗錢防制新法---日常生活實用篇



行政院洗錢防制辦公室

*Anti-Money Laundering Office,
Executive Yuan*



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洗錢防制作不好 經濟體制怎會好

吸引犯罪分子，諸如詐欺、毒品、吸金、走私等犯罪活動活絡，將影響百姓安居樂業生活及產業發展！

犯罪洗錢天堂



資金匯兌受阻

其他國家金融機構將提高審查與臺灣有關之投資、匯兌等金融活動門檻，進而嚴重影響臺灣工商活動的效率及一般民眾之跨境匯款！！

犯罪分子以合法掩飾非法，創造不法利得之犯罪黑洞，造成合法產業蕭條之惡性循環！！！！

合法產業潰堤

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全民落實反洗錢 國際評鑑齊向前

為何要有國際評鑑？

1.我國為亞太防制洗錢組織(Asia Pacific Group on Anti-Money Laundering, 簡稱APG) 會員

-國際洗錢防制評鑑係透過其區域組織以會員間相互評鑑的方式進行，我國為該組織會員，應參與亞太區之反洗錢相互評鑑。

2.需接受防制洗錢及打擊資恐評鑑

-評鑑未通過→追蹤→加強追蹤→制裁

3.評鑑係為健全我國金融體制接軌國際經濟，列入制裁名單將影響臺灣經濟地位

-如果我國被列入制裁名單，所有民生物資將因制裁行動而增加無謂的成本，如銀行將提高客戶及資金審查門檻，影響你我的生活品質。



加強審查PEP 政府清廉民安心

■PEP (Politically Exposed Person) 為擔任重要政治職務人士

報紙常在講洗錢要查的密友或小三是什麼

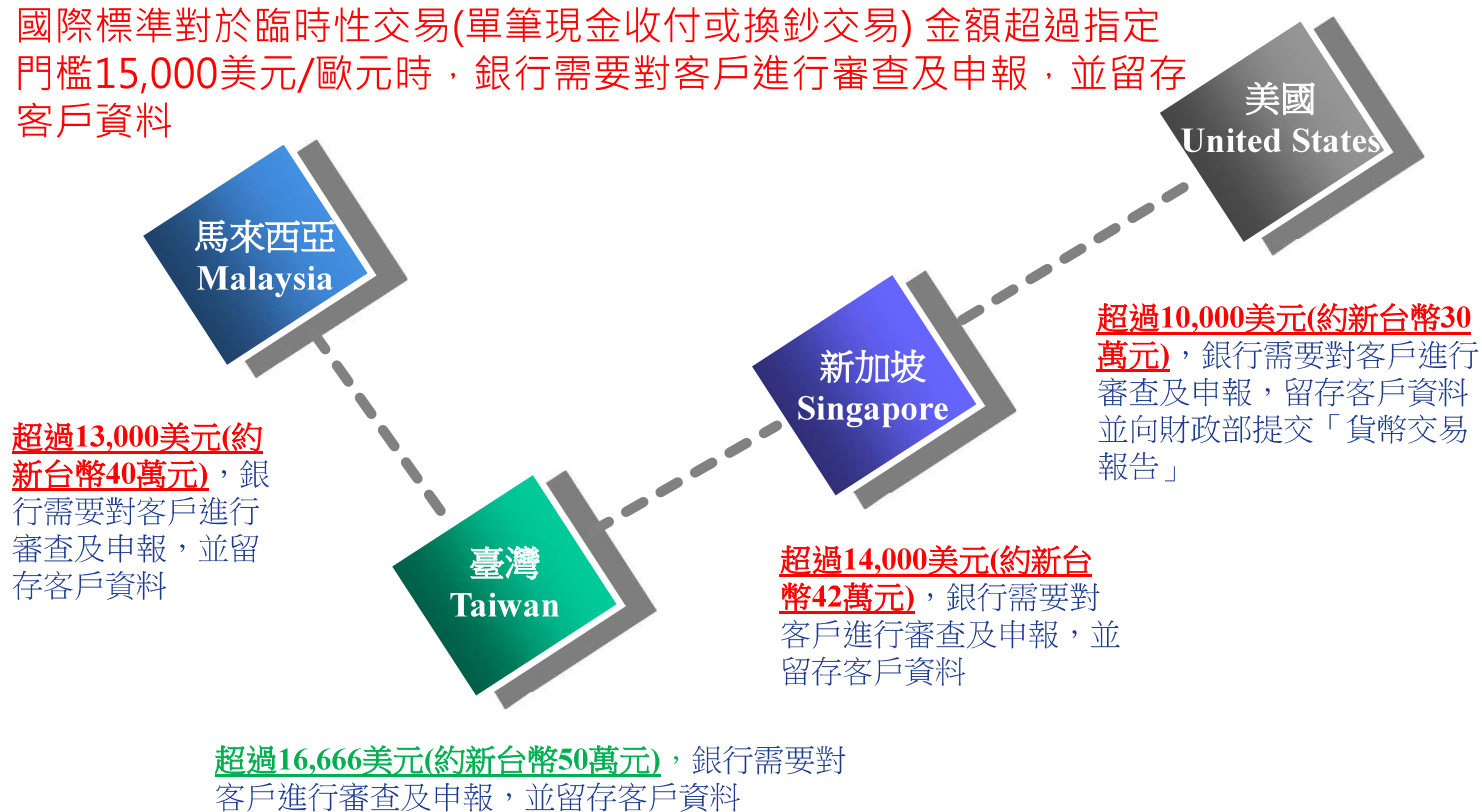


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資金留軌跡 犯罪都絕跡

銀行存提款或換鈔超過50萬要審查及申報，是國際慣例!!

國際標準對於臨時性交易(單筆現金收付或換鈔交易) 金額超過指定門檻15,000美元/歐元時，銀行需要對客戶進行審查及申報，並留存客戶資料



交易申報透明化 國家財富不外流

金融業及非金融事業從業人員=洗錢防制全員到齊

金融業



■ 銀樓業



■ 律師、公證人、會計師



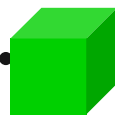
非金融事業
從業人員

為客戶準備或進行

- 買賣不動產
- 管理金錢
- 證券或其他資產等相關交易

■ 地政士

■ 不動產經紀業



■ 律師、會計師



為客戶準備或進行

- 擔任法人名義代表人等相關交易

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現金珠寶帶出國 申報清楚才安全

出國或回國時，到底可以帶多少現金？
通關時要申報的物品如下：

新臺幣現鈔
逾10萬元

逾新台幣10萬元

人民幣現鈔
逾2萬元

逾人民幣2萬元

-外幣、香港或澳門發行之貨幣現鈔

-有價證券(包括無記名之旅行支票、其他支票、本票、匯票或得由持有人在本地或外國行使權利之其他有價證券)

總價值逾等值美金1萬元

黃金及有被利用進行洗錢之虞之物品(例如珠寶等)達一定金額以上

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行政院洗錢防制辦公室 關心您



行政院洗錢防制辦公室

*Anti-Money Laundering Office,
Executive Yuan*



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Financial Institution Name:
Location (Country) :

First Life Insurance Co., Ltd.
13F, No.456, Sec. 4, Xin Yi Road, Xin Yi District, Taipei City 11052, Taiwan

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

| No # | Question | Answer |
|----------------------------------|--|--|
| 1. ENTITY & OWNERSHIP | | |
| 1 | Full Legal Name | First Life Insurance Co., Ltd. |
| 2 | Append a list of foreign branches which are covered by this questionnaire | Not applicable |
| 3 | Full Legal (Registered) Address | 13F, No.456, Sec. 4, Xin Yi Road, Xin Yi District, Taipei City 11052, Taiwan |
| 4 | Full Primary Business Address (if different from above) | Same as above |
| 5 | Date of Entity incorporation/establishment | 2007/12/11 |
| 6 | Select type of ownership and append an ownership chart if available | |
| 6 a | Publicly Traded (25% of shares publicly traded) | No |
| 6 a1 | If Y, indicate the exchange traded on and ticker symbol | |
| 6 b | Member Owned/Mutual | No |
| 6 c | Government or State Owned by 25% or more | No |
| 6 d | Privately Owned | Yes |
| 6 d1 | If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more | First Financial Holding Co., Ltd. owns 100% shares. |
| 7 | % of the Entity's total shares composed of bearer shares | 0% |
| 8 | Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)? | No |
| 8 a | If Y, provide the name of the relevant branch/es which operate under an OBL | |
| 9 | Does the Bank have a Virtual Bank License or provide services only through online channels? | No |
| 10 | Name of primary financial regulator/supervisory authority | Financial Supervisory Commission, R.O.C. (Taiwan) |
| 11 | Provide Legal Entity Identifier (LEI) if available | 營業登記金台保換字第1133022號 |
| 12 | Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ) | First Financial Holding Co., Ltd. |

| | | |
|-----------------------------------|---|---|
| 13 | Jurisdiction of licensing authority and regulator of ultimate parent | Financial Supervisory Commission, R.O.C. (Taiwan) |
| 14 | Select the business areas applicable to the Entity | |
| 14 a | Retail Banking | No |
| 14 b | Private Banking | No |
| 14 c | Commercial Banking | No |
| 14 d | Transactional Banking | No |
| 14 e | Investment Banking | No |
| 14 f | Financial Markets Trading | No |
| 14 g | Securities Services/Custody | No |
| 14 h | Broker/Dealer | No |
| 14 i | Multilateral Development Bank | No |
| 14 j | Wealth Management | No |
| 14 k | Other (please explain) | Life insurance company |
| 15 | Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided) | No |
| 15 a | If Y, provide the top five countries where the non-resident customers are located. | |
| 16 | Select the closest value: | |
| 16 a | Number of employees | 201-500 |
| 16 b | Total Assets | Greater than \$500 million |
| 17 | Confirm that all responses provided in the above Section are representative of all the LE's branches. | Yes |
| 17 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 18 | If appropriate, provide any additional information/context to the answers in this section. | |
| 2. PRODUCTS & SERVICES | | |
| 19 | Does the Entity offer the following products and services: | |
| 19 a | Correspondent Banking | No |
| 19 a1 | If Y | |
| 19 a1a | Does the Entity offer Correspondent Banking services to domestic banks? | Please select |
| 19 a1b | Does the Entity allow domestic bank clients to provide downstream relationships? | Please select |
| 19 a1c | Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? | Please select |
| 19 a1d | Does the Entity offer Correspondent Banking services to foreign banks? | Please select |
| 19 a1e | Does the Entity allow downstream relationships with foreign banks? | Please select |
| 19 a1f | Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? | Please select |
| 19 a1g | Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTs)? | Please select |
| 19 a1h | Does the Entity allow downstream relationships with MSBs, MVTs, or Payment Service Provider (PSPs)? | |
| 19 a1h1 | MSBs | Please select |
| 19 a1h2 | MVTs | Please select |
| 19 a1h3 | PSPs | Please select |

| | | |
|--|---|--|
| 19 a11 | Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/PSPs? | Please select |
| 19 b | Cross-Border Bulk Cash Delivery | No |
| 19 c | Cross-Border Remittances | No |
| 19 d | Domestic Bulk Cash Delivery | No |
| 19 e | Hold Mail | No |
| 19 f | International Cash Letter | No |
| 19 g | Low Price Securities | No |
| 19 h | Payable Through Accounts | No |
| 19 i | Payment services to non-bank entities who may then offer third party payment services to their customers? | No |
| 19 i1 | If Y , please select all that apply below? | |
| 19 i2 | Third Party Payment Service Providers | Please select |
| 19 i3 | Virtual Asset Service Providers (VASPs) | Please select |
| 19 i4 | eCommerce Platforms | Please select |
| 19 i5 | Other - Please explain | |
| 19 j | Private Banking | No |
| 19 k | Remote Deposit Capture (RDC) | No |
| 19 l | Sponsoring Private ATMs | No |
| 19 m | Stored Value Instruments | No |
| 19 n | Trade Finance | No |
| 19 o | Virtual Assets | No |
| 19 p | For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence: | |
| 19 p1 | Check cashing service | No |
| 19 p1a | If yes, state the applicable level of due diligence | Please select |
| 19 p2 | Wire transfers | No |
| 19 p2a | If yes, state the applicable level of due diligence | Please select |
| 19 p3 | Foreign currency conversion | No |
| 19 p3a | If yes, state the applicable level of due diligence | Please select |
| 19 p4 | Sale of Monetary Instruments | No |
| 19 p4a | If yes, state the applicable level of due diligence | Please select |
| 19 p5 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. | |
| 19 q | Other high-risk products and services identified by the Entity (please specify) | Investment-linked insurance products / annuities /single premium or short term payment interest-sensitive insurance products |
| 20 | Confirm that all responses provided in the above Section are representative of all the LE's branches. | No branches |
| 20 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 21 | If appropriate, provide any additional information/context to the answers in this section. | |
| 3. AML, CTF & SANCTIONS PROGRAMME | | |
| 22 | Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: | |
| 22 a | Appointed Officer with sufficient experience/expertise | Yes |
| 22 b | Adverse Information Screening | Yes |
| 22 c | Beneficial Ownership | Yes |
| 22 d | Cash Reporting | Yes |
| 22 e | CDD | Yes |
| 22 f | EDD | Yes |
| 22 g | Independent Testing | Yes |
| 22 h | Periodic Review | Yes |
| 22 i | Policies and Procedures | Yes |
| 22 j | PEP Screening | Yes |
| 22 k | Risk Assessment | Yes |
| 22 l | Sanctions | Yes |

| | | |
|---|---|--|
| 22 m | Suspicious Activity Reporting | Yes |
| 22 n | Training and Education | Yes |
| 22 o | Transaction Monitoring | Yes |
| 23 | How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? | 1-10 |
| 24 | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29. | Yes |
| 25 | Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? | Yes |
| 26 | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? | No |
| 26 a | If Y, provide further details | |
| 27 | Does the entity have a whistleblower policy? | Yes |
| 28 | Confirm that all responses provided in the above Section are representative of all the LE's branches | No branches |
| 28 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 29 | If appropriate, provide any additional information/context to the answers in this section. | |
| 4. ANTI BRIBERY & CORRUPTION | | |
| 30 | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? | Yes |
| 31 | Does the Entity have an enterprise wide programme that sets minimum ABC standards? | Yes |
| 32 | Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? | Yes |
| 33 | Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? | Yes |
| 34 | Is the Entity's ABC programme applicable to: | Both joint ventures and third parties acting on behalf of the Entity |
| 35 | Does the Entity have a global ABC policy that: | |
| 35 a | Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage. | Yes |
| 35 b | Includes enhanced requirements regarding interaction with public officials? | Yes |
| 35 c | Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? | Yes |
| 36 | Does the Entity have controls in place to monitor the effectiveness of their ABC programme? | Yes |
| 37 | Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? | Yes |
| 38 | Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? | Yes |
| 38 a | If N, provide the date when the last ABC EWRA was completed. | |
| 39 | Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? | Yes |
| 40 | Does the Entity's ABC EWRA cover the inherent risk components detailed below: | Yes |
| 40 a | Potential liability created by intermediaries and other third-party providers as appropriate | Yes |

| | | |
|--|--|---------------|
| 40 b | Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries | Yes |
| 40 c | Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials | Yes |
| 40 d | Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions | Yes |
| 40 e | Changes in business activities that may materially increase the Entity's corruption risk | Yes |
| 41 | Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures? | Yes |
| 42 | Does the Entity provide mandatory ABC training to: | |
| 42 a | Board and senior Committee Management | Yes |
| 42 b | 1st Line of Defence | Yes |
| 42 c | 2nd Line of Defence | Yes |
| 42 d | 3rd Line of Defence | Yes |
| 42 e | Third parties to which specific compliance activities subject to ABC risk have been outsourced | Yes |
| 42 f | Non-employed workers as appropriate (contractors/consultants) | Yes |
| 43 | Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? | Yes |
| 44 | Confirm that all responses provided in the above Section are representative of all the LE's branches | No branches |
| 44 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 45 | If appropriate, provide any additional information/context to the answers in this section. | |
| 5. AML, CTF & SANCTIONS POLICIES & PROCEDURES | | |
| 46 | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: | |
| 46 a | Money laundering | Yes |
| 46 b | Terrorist financing | Yes |
| 46 c | Sanctions violations | Yes |
| 47 | Are the Entity's policies and procedures updated at least annually? | Yes |
| 48 | Has the Entity chosen to compare its policies and procedures against: | |
| 48 a | U.S. Standards | No |
| 48 a1 | If Y, does the Entity retain a record of the results? | Please select |
| 48 b | EU Standards | No |
| 48 b1 | If Y, does the Entity retain a record of the results? | Please select |
| 49 | Does the Entity have policies and procedures that: | |
| 49 a | Prohibit the opening and keeping of anonymous and fictitious named accounts | Yes |
| 49 b | Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs | Yes |
| 49 c | Prohibit dealing with other entities that provide banking services to unlicensed banks | Yes |
| 49 d | Prohibit accounts/relationships with shell banks | Yes |
| 49 e | Prohibit dealing with another entity that provides services to shell banks | Yes |
| 49 f | Prohibit opening and keeping of accounts for Section 311 designated entities | Yes |
| 49 g | Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents | Yes |
| 49 h | Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates | Yes |

| | | |
|--|--|-----------------|
| 49 i | Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees | Yes |
| 49 j | Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk | Yes |
| 49 k | Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates | Yes |
| 49 l | Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship | Yes |
| 49 m | Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News | Yes |
| 49 n | Outline the processes for the maintenance of internal "watchlists" | Yes |
| 50 | Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business? | Yes |
| 51 | Does the Entity have record retention procedures that comply with applicable laws? | Yes |
| 51 a | If Y, what is the retention period? | 5 years or more |
| 52 | Confirm that all responses provided in the above Section are representative of all the LE's branches | No branches |
| 52 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 53 | If appropriate, provide any additional information/context to the answers in this section. | |
| 6. AML, CTF & SANCTIONS RISK ASSESSMENT | | |
| 54 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: | |
| 54 a | Client | Yes |
| 54 b | Product | Yes |
| 54 c | Channel | Yes |
| 54 d | Geography | Yes |
| 55 | Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: | |
| 55 a | Transaction Monitoring | Yes |
| 55 b | Customer Due Diligence | Yes |
| 55 c | PEP Identification | Yes |
| 55 d | Transaction Screening | Yes |
| 55 e | Name Screening against Adverse Media/Negative News | Yes |
| 55 f | Training and Education | Yes |
| 55 g | Governance | Yes |
| 55 h | Management Information | Yes |
| 56 | Has the Entity's AML & CTF EWRA been completed in the last 12 months? | Yes |
| 56 a | If N, provide the date when the last AML & CTF EWRA was completed. | |
| 57 | Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: | |
| 57 a | Client | Yes |
| 57 b | Product | Yes |
| 57 c | Channel | Yes |
| 57 d | Geography | Yes |
| 58 | Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |
| 58 a | Customer Due Diligence | Yes |
| 58 b | Governance | Yes |
| 58 c | List Management | Yes |
| 58 d | Management Information | Yes |

| | | |
|----------------------------|---|-------------|
| 58 e | Name Screening | Yes |
| 58 f | Transaction Screening | Yes |
| 58 g | Training and Education | Yes |
| 59 | Has the Entity's Sanctions EWRA been completed in the last 12 months? | Yes |
| 59 a | If N, provide the date when the last Sanctions EWRA was completed. | |
| 60 | Confirm that all responses provided in the above Section are representative of all the LE's branches | No branches |
| 60 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 61 | If appropriate, provide any additional information/context to the answers in this section. | |
| 7. KYC, CDD and EDD | | |
| 62 | Does the Entity verify the identity of the customer? | Yes |
| 63 | Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days? | Yes |
| 64 | Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: | |
| 64 a | Customer identification | Yes |
| 64 b | Expected activity | Yes |
| 64 c | Nature of business/employment | Yes |
| 64 d | Ownership structure | Yes |
| 64 e | Product usage | Yes |
| 64 f | Purpose and nature of relationship | Yes |
| 64 g | Source of funds | Yes |
| 64 h | Source of wealth | Yes |
| 65 | Are each of the following identified: | |
| 65 a | Ultimate beneficial ownership | Yes |
| 65 a1 | Are ultimate beneficial owners verified? | Yes |
| 65 b | Authorised signatories (where applicable) | Yes |
| 65 c | Key controllers | Yes |
| 65 d | Other relevant parties | No |
| 66 | What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? | 25% |
| 67 | Does the due diligence process result in customers receiving a risk classification? | Yes |
| 67 a | If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: | |
| 67 a1 | Product Usage | Yes |
| 67 a2 | Geography | Yes |
| 67 a3 | Business Type/Industry | Yes |
| 67 a4 | Legal Entity type | Yes |
| 67 a5 | Adverse Information | Yes |
| 67 a6 | Other (specify) | |
| 68 | For high risk non-individual customers, is a site visit a part of your KYC process? | Yes |
| 68 a | If Y, is this at: | |
| 68 a1 | Onboarding | Yes |
| 68 a2 | KYC renewal | Yes |
| 68 a3 | Trigger event | Yes |
| 68 a4 | Other | No |
| 68 a4a | If yes, please specify "Other" | |
| 69 | Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? | Yes |
| 69 a | If Y, is this at: | |
| 69 a1 | Onboarding | Yes |
| 69 a2 | KYC renewal | Yes |

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) V1.4

| | | |
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| 69 a3 | Trigger event | Yes |
| 70 | What is the method used by the Entity to screen for Adverse Media/Negative News? | Combination of automated and manual |
| 71 | Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? | Yes |
| 71 a | If Y, is this at: | |
| 71 a1 | Onboarding | Yes |
| 71 a2 | KYC renewal | Yes |
| 71 a3 | Trigger event | Yes |
| 72 | What is the method used by the Entity to screen PEPs? | Combination of automated and manual |
| 73 | Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? | Yes |
| 74 | Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? | Yes |
| 74 a | If yes, select all that apply: | |
| 74 a1 | Less than one year | No |
| 74 a2 | 1 – 2 years | No |
| 74 a3 | 3 – 4 years | No |
| 74 a4 | 5 years or more | No |
| 74 a5 | Trigger-based or perpetual monitoring reviews | Yes |
| 74 a6 | Other (Please specify) | High risk-1 year Medium risk-3 year Low risk-5 year |
| 75 | Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews? | Yes |
| 76 | From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme? | |
| 76 a | Arms, defence, military | EDD on risk-based approach |
| 76 b | Respondent Banks | EDD on risk-based approach |
| 76 b1 | If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? | Yes |
| 76 c | Embassies/Consulates | EDD on risk-based approach |
| 76 d | Extractive industries | EDD on risk-based approach |
| 76 e | Gambling customers | EDD on risk-based approach |
| 76 f | General Trading Companies | EDD on risk-based approach |
| 76 g | Marijuana-related Entities | Prohibited |
| 76 h | MSB/MVTS customers | EDD on risk-based approach |
| 76 i | Non-account customers | Prohibited |
| 76 j | Non-Government Organisations | EDD on risk-based approach |
| 76 k | Non-resident customers | EDD on risk-based approach |
| 76 l | Nuclear power | Do not have this category of customer or industry |
| 76 m | Payment Service Providers | EDD on risk-based approach |
| 76 n | PEPs | EDD on risk-based approach |
| 76 o | PEP Close Associates | EDD on risk-based approach |
| 76 p | PEP Related | EDD on risk-based approach |
| 76 q | Precious metals and stones | EDD on risk-based approach |
| 76 r | Red light businesses/Adult entertainment | EDD on risk-based approach |
| 76 s | Regulated charities | EDD on risk-based approach |
| 76 t | Shell banks | Prohibited |
| 76 u | Travel and Tour Companies | EDD on risk-based approach |
| 76 v | Unregulated charities | EDD on risk-based approach |
| 76 w | Used Car Dealers | EDD on risk-based approach |
| 76 x | Virtual Asset Service Providers | EDD on risk-based approach |
| 76 y | Other (specify) | |
| 77 | If restricted, provide details of the restriction | We do not adopt EDD restricted methodologies |
| 78 | Does EDD require senior business management and/or compliance approval? | Yes |

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| 78 a | If Y indicate who provides the approval: | Senior business management |
| 79 | Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents? | Yes |
| 80 | Does the Entity perform an additional control or quality review on clients subject to EDD? | Yes |
| 81 | Confirm that all responses provided in the above Section are representative of all the LE's branches | No branches |
| 81 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to | |
| 82 | If appropriate, provide any additional information/context to the answers in this section. | |
| 8. MONITORING & REPORTING | | |
| 83 | Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity? | Yes |
| 84 | What is the method used by the Entity to monitor transactions for suspicious activities? | Combination of automated and manual |
| 84 a | If manual or combination selected, specify what type of transactions are monitored manually | Unusual customer behaviors |
| 84 b | If automated or combination selected, are internal system or vendor-sourced tools used? | Both |
| 84 b1 | If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool? | Lyodssoft |
| 84 b2 | When was the tool last updated? | < 1 year |
| 84 b3 | When was the automated Transaction Monitoring application last calibrated? | < 1 year |
| 85 | Does the Entity have regulatory requirements to report suspicious transactions? | Yes |
| 85 a | If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? | Yes |
| 86 | Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? | Yes |
| 87 | Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? | Yes |
| 88 | Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? | Yes |
| 89 | Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? | Yes |
| 90 | Confirm that all responses provided in the above Section are representative of all the LE's branches | No branches |
| 90 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to | |
| 91 | If appropriate, provide any additional information/context to the answers in this section. | |
| 9. PAYMENT TRANSPARENCY | | |
| 92 | Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? | Yes |

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| 93 | Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: | |
| 93 a | FATF Recommendation 16 | Yes |
| 93 b | Local Regulations | Yes |
| 93 b1 | If Y, specify the regulation | Money Laundering Control Act Regulations Governing Anti-Money Laundering of Financial Institutions |
| 93 c | If N, explain | |
| 94 | Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages? | Yes |
| 95 | Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages? | Yes |
| 95 a | If Y, does the Entity have procedures to include beneficiary address including country in cross border payments? | Yes |
| 96 | Confirm that all responses provided in the above Section are representative of all the LE's branches | No branches |
| 96 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 97 | If appropriate, provide any additional information/context to the answers in this section. | |
| 10. SANCTIONS | | |
| 98 | Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? | Yes |
| 99 | Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)? | Yes |
| 100 | Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? | Yes |
| 101 | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? | Yes |
| 102 | What is the method used by the Entity for sanctions screening? | Automated |
| 102 a | If 'automated' or 'both automated and manual' selected: | |
| 102 a1 | Are internal system of vendor-sourced tools used? | Both |
| 102 a1a | If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? | Lyodsssoft and Refinitiv(World-check) |
| 102 a2 | When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110) | < 1 year |
| 103 | Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? | Yes |
| 104 | What is the method used by the Entity? | Automated |

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| 105 | Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening? | Yes |
| 106 | Select the Sanctions Lists used by the Entity in its sanctions screening processes: | |
| 106 a | Consolidated United Nations Security Council Sanctions List (UN) | Used for screening customers and beneficial owners and for filtering transactional data |
| 106 b | United States Department of the Treasury's Office of Foreign Assets Control (OFAC) | Used for screening customers and beneficial owners and for filtering transactional data |
| 106 c | Office of Financial Sanctions Implementation HMT (OFSI) | Used for screening customers and beneficial owners and for filtering transactional data |
| 106 d | European Union Consolidated List (EU) | Used for screening customers and beneficial owners and for filtering transactional data |
| 106 e | Lists maintained by other G7 member countries | Used for screening customers and beneficial owners and for filtering transactional data |
| 106 f | Other (specify) | The local Regulator's sanction list. |
| 107 | When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against: | |
| 107 a | Customer Data | Within 3 to 5 business days |
| 107 b | Transactions | Within 3 to 5 business days |
| 108 | Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions? | No |
| 109 | Confirm that all responses provided in the above Section are representative of all the LE's branches | No branches |
| 109 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 110 | If appropriate, provide any additional information/context to the answers in this section. | |
| 11. TRAINING & EDUCATION | | |
| 111 | Does the Entity provide mandatory training, which includes: | |
| 111 a | Identification and reporting of transactions to government authorities | Yes |
| 111 b | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered | Yes |
| 111 c | Internal policies for controlling money laundering, terrorist financing and sanctions violations | Yes |
| 111 d | New issues that occur in the market, e.g. significant regulatory actions or new regulations | Yes |
| 111 e | Conduct and Culture | Yes |
| 111 f | Fraud | Yes |
| 112 | Is the above mandatory training provided to: | |
| 112 a | Board and Senior Committee Management | Yes |
| 112 b | 1st Line of Defence | Yes |
| 112 c | 2nd Line of Defence | Yes |
| 112 d | 3rd Line of Defence | Yes |
| 112 e | Third parties to which specific FCC activities have been outsourced | Not Applicable |
| 112 f | Non-employed workers (contractors/consultants) | No |
| 113 | Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities? | Yes |
| 114 | Does the Entity provide customised training for AML, CTF and Sanctions staff? | Yes |
| 114 a | If Y, how frequently is training delivered? | Annually |
| 115 | Confirm that all responses provided in the above Section are representative of all the LE's branches | No branches |

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| 115 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 116 | If appropriate, provide any additional information/context to the answers in this section. | |
| 12. QUALITY ASSURANCE /COMPLIANCE TESTING | | |
| 117 | Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)? | Yes |
| 118 | Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)? | Yes |
| 119 | Confirm that all responses provided in the above Section are representative of all the LE's branches | No branches |
| 119 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 120 | If appropriate, provide any additional information/context to the answers in this section. | |
| 13. AUDIT | | |
| 121 | In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? | Yes |
| 122 | How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: | |
| 122 a | Internal Audit Department | Yearly |
| 122 b | External Third Party | Yearly |
| 123 | Does the internal audit function or other independent third party cover the following areas: | |
| 123 a | AML, CTF, ABC, Fraud and Sanctions policy and procedures | Yes |
| 123 b | Enterprise Wide Risk Assessment | Yes |
| 123 c | Governance | Yes |
| 123 d | KYC/CDD/EDD and underlying methodologies | Yes |
| 123 e | Name Screening & List Management | Yes |
| 123 f | Reporting/Metrics & Management Information | Yes |
| 123 g | Suspicious Activity Filing | Yes |
| 123 h | Technology | Yes |
| 123 i | Transaction Monitoring | Yes |
| 123 j | Transaction Screening including for sanctions | Yes |
| 123 k | Training & Education | Yes |
| 123 l | Other (specify) | |
| 124 | Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? | Yes |
| 125 | Confirm that all responses provided in the above section are representative of all the LE's branches | No branches |
| 125 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 126 | If appropriate, provide any additional information/context to the answers in this section. | |
| 14. FRAUD | | |
| 127 | Does the Entity have policies in place addressing fraud risk? | Yes |
| 128 | Does the Entity have a dedicated team responsible for preventing & detecting fraud? | Yes |

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| 129 | Does the Entity have real time monitoring to detect fraud? | Yes |
| 130 | Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID? | Yes |
| 131 | Confirm that all responses provided in the above section are representative of all the LE's branches | No branches |
| 131 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 132 | If appropriate, provide any additional information/context to the answers in this section. | |

Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)

Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)

First Life Insurance Co.,Ltd. (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

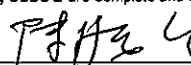
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

I, _____ (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

I, Jenny Chen (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

 (Signature & Date)

10/14/2024 (Signature & Date)