

AML and Sanctions Risk Appetite Statement
兆豐國際商業銀行防制洗錢及制裁風險胃納聲明

Purpose 目的

Mega International Commercial Bank Co., Ltd. (“Mega”) AML and Sanctions Risk Appetite Statement provides the framework through which Mega describes the level and types of AML and Sanctions risk that the organization is willing to incur in executing its broader business strategy. This framework contemplates the global reach of our business lines and recognizes the many laws, regulations and regulatory expectations in the jurisdictions we serve.

兆豐國際商業銀行股份有限公司（以下簡稱「兆豐」）藉由本防制洗錢及制裁風險胃納聲明書，對其在執行更廣泛的業務策略所願意承擔之防制洗錢及制裁之風險程度和類型，提供相關的架構與說明，此架構亦考量兆豐業務的全球觸角，以及服務提供地所受之諸多法律、法規和監管預期。

This AML and Sanctions Risk Appetite Statement and the quantitative indicators and qualitative goals included represent a step in an evolving process.

本防制洗錢及制裁風險胃納聲明及其所包含之量化指標和質化目標，代表兆豐持續進化程序中的一個步驟。

To support the Risk Appetite, Mega develops the quantitative indicators and qualitative goals of acceptable risk. These limits will be monitored and reported on, and any breaches of these limits will be escalated to the Head Office Compliance Committee and the Board of Directors.

為實行此風險胃納，兆豐已制定可接受風險之量化指標和質化目標，並予以監控和陳報。任何違反風險胃納聲明與風險限額的情形將會呈報到總行的法令遵循委員會和董事會。

Risk Profile 風險面向

As a major global financial institution, Mega faces a wide range of risks from entities and/or individuals that may be associated with illicit activity, including financial crime and money laundering, terrorist financing, proliferation financing, and sanctions. Mega will not knowingly conduct business with any individual or entity who has wittingly or unwittingly engaged in such activities.

身為一主要的全球金融機構，兆豐面臨各種可能與非法活動有關的企業和/或個人的廣泛風險，包括金融犯罪和洗錢、資助恐怖主義、資助武器擴散與制裁等。兆豐不會故意與任何有意或無意地參與此類活動的企業和/或個人進行業務往來。

Mega understands and acknowledges the inherent risk of its global operations being used as a conduit for financial crime and money laundering, terrorist financing, proliferation financing, and sanctions and related activities. We recognize that entities and/or individuals may attempt to utilize Mega’s products and services for illicit purposes; as a result, Mega has established the Head Office Anti-Money Laundering and Financial Crime Compliance Department (“HO AML and FCC Department”). The HO AML and FCC Department is dedicated to the planning and effective implementation of Mega’s AML and Sanctions compliance functions with the goal of ensuring that Mega meets the expectations and requirements of all laws and regulations in various jurisdictions.

兆豐了解並認知其全球營運有面臨被利用作為金融犯罪和洗錢、資助恐怖主義、資助武器擴散與制裁等相關活動管道之固有風險，企業和/或個人可能會試圖利用兆豐的產品與服務於非法目的，因此，兆豐成立了反洗錢暨金融犯罪防制處（以下簡稱「洗防處」）。洗防處致力於規劃和有效落實兆豐防制洗錢及制裁之法遵職能，以確保兆豐符合各個司法管轄區所有法律和法規的期望和要求。

Risk Assessments 風險評估

Mega conduct annual money laundering, terrorist financing, proliferation financing, and sanctions Risk Assessments on an enterprise-wide, and entity level. The fundamental purpose of such risk assessments is to identify Mega's Money Laundering and Sanctions risk profile and drive improvements in Mega's risk mitigation strategies, determining how these risks are mitigated by AML and Sanctions controls, and establishing the residual risk that remains. At most, the acceptable residual Mega AML and Sanctions Risk Appetite is "medium risk".

兆豐執行全行及個別層級的年度洗錢、資助恐怖主義、資助武器擴散與制裁風險評估。該風險評估執行的基本目的在於辨識兆豐的洗錢與制裁風險面向，並據以提出風險抵減策略，以決定該些被辨識的風險是如何透過防制洗錢及制裁相關控制措施予以抵減，從而確認仍存在的剩餘風險。本行至多可接受之剩餘風險胃納為「中風險」。

The Business Units, HO AML and FCC Department, and other relevant stakeholders shall conduct AML and Sanctions-focused assessments of customers, products, delivery channels, services and geographies to determine whether AML and Sanctions risks and implemented mitigating strategies align with Mega's Risk Appetite.

業務部門、洗防處、及其它相關的部門與單位需對其客戶、產品與服務、通路及地域等進行洗錢及制裁相關的評估，以決定相關的風險與所採取的風險抵減策略是否符合兆豐之風險胃納。

Unacceptable Risk Levels 無法接受之風險程度

Mega has no tolerance for breaches of laws, rules, Sanctions, and regulations. We are committed to complying with the spirit and intent of all applicable laws, regulations, and standards of good market practice in every jurisdiction in which we operate. Mega will not operate without establishing the appropriate systems of controls to prevent, detect, and deter illicit activity. Mega shall not enter into a relationship or otherwise knowingly conduct business with prohibited customer types, as designated by the Global AML and Sanctions Program.¹

兆豐不容許任何違反法律、規章、制裁及法規之事項。對於每一個兆豐營運據點，我們承諾將遵循其當地適用之所有法律、法規及業界優良實務標準之內容及其精神。在未對非法活動建立適當防範、偵測及遏止之適當控制制度前，兆豐將不會從事相關的營運活動。對於在全球防制洗錢及打擊資恐規章中所規範的禁止往來之客戶類型，兆豐亦不會建立業務關係。

Risk Limits 風險限額

¹ Please refer to Global AML and Sanctions Program for Prohibited Relationships.

禁止建立往來關係之客戶類型請參照全球防制洗錢及打擊資恐規章。

Mega will monitor the risk limits on a periodic basis. Once the quantitative metrics breached its designated target value or early warning value, Mega will develop a corrective action plan covering measures such as restricting business activities and/or strengthening mitigating controls.

兆豐將定期監控風險限額。當量化指標違反所設定之目標值或預警值時，兆豐將擬定改善計畫，相關措施包含限制業務活動，及/或強化風險抵減之控制程序等。

The BoD will annually review and approve Mega's AML and Sanctions risk limits.

防制洗錢及制裁風險限額應每年經董事會審視並為核准。

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