



台灣樂天信用卡(股)公司
防制洗錢及打擊資恐內部控制制度聲明書

TRC AML_CFT Internal Control Statement

謹代表台灣樂天信用卡股份有限公司聲明本公司於113年1月1日至113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，定期陳報董事會及監察人。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，除附表所列事項外，均能確實有效執行。

On behalf of Taiwan Rakuten Credit Card Co., Ltd., it is stated that the company has strictly adhered the Anti-Money Laundering and Counter Terrorism Financing (AML_CFT) Laws & Regulations from January 1, 2024 to December 31, 2024 to establish an internal control mechanism to ensure risk is managed and independently conduct audits and periodical report to BOD and the Supervisor. After prudent evaluation, the internal control of AML_CFT of each unit in this year can be effectively and effectively executed except for the items listed in the attached table.

謹致 To FSC

金融監督管理委員會

聲明人

董事長：前川龍 (簽章)

總經理： (簽章)

稽核主管： (簽章)

防制洗錢及打擊資恐專責主管： (簽章)

中華民國 114 年 3 月 21 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：113 年 12 月 31 日)

應 加 強 事 項 Need Improvement (Improvement action to address the issue raised by 2024 FSC Financial Inspection and Internal Audit review)	改 善 措 施 Corrective action plan	預 定 完 成 改 善 時 間 Target Completion Date of Corrective Action Plan
<p>壹、主管機關專案檢查【113L019】所提列之缺失並經內部稽核查核驗證仍有需加強改善之事項：</p> <p>一、檢查意見三(二)</p> <p>辦理客戶定期審查作業，經查有下列事項欠妥：</p> <p>1. 有未對高風險客戶業務關係中交易過程進行審視，以確保交易與客戶風險相符者。</p> <p>For high risk customer shall be subjected to enhanced Customer Due Diligence (EDD), in terms of the enhance DD shall have the checking of the customer's source of fund and understanding the customer behaviors in customer on-boarding and periodic review phases.</p>	<p>1. AML 專責部門已依本項查核意見，修訂內部 AML 規章就高風險客戶採加強客戶審查(EDD)之措施，並已依修正後規定，於辦理 2024 年高風險客戶定期審查時，就當年度交易狀況一併審視在案。</p> <p>AML dept. has revised AML policy and completed the regular review of high-risk customers in 2024, including the review of transaction status on Feb 27, 2025.</p>	<p>1. 已於 2025 年 2 月 27 日完成</p>
<p>2. 符合一定條件之低風險客戶，有未於事件觸發發生時立即啟動定期審查及風險評估更新作業評估資料更新作業。」規定不符。</p> <p>Lack of control over Trigger review CDD, when a "triggering event" occurs, the CDD review and risk assessment of the customer should be initiated to facilitate the update of customer information.</p>	<p>2. AML 專責部門已依本項查核意見，就目前觸發條件狀況，調整內部規定、修改觸發條件。目前 MIS 部門已依修正後規定，每日協助產製監控報表，當有定期審查經簡化之低風險客戶發生觸發條件時，即應補做定期審查；惟另有低風險客戶觸發 CDD 執行未落實，缺乏適當執行，預計於 2025 年 6 月底前完成。</p> <p>AML dept. has revised triggering event of AML policy, and started to trigger review based on MIS daily</p>	<p>2. 預計於 2025 年 6 月底前完成。</p>

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	report. But the current process for triggering CDD reviews for low-risk customers lacks proper execution, resulting in inadequate reviews. Will completed before end of June, 2025	
<p>二、辦理客戶風險等級評估作業，有下列事項欠妥者，</p> <p>Handling Customer Due Diligence process of customer risk rating assessment operations</p> <p>1. 高風險洗錢行業之客戶或客戶涉及高風險行業，有未依所訂「風險評分表」評估風險等級者</p> <p>Customers associated with high-risk industries or high-risk occupations</p>	<p>1. AML 專責部門已修正內部規定，依金檢查核意見針對既有客戶進行清查，就所述涉及高風險行業之客戶，重新校正其風險分數及風險等級，惟尚有未能清楚辨識之若干客戶仍在進行確認中，預計於 2025 年 3 月 31 日前完成。</p> <p>後續如有客戶更改其職業類別涉及高風險洗錢行業者，將採即時調整其風險分數及風險等級。</p> <p>AML dept. has completed inventory of existing customers, to recalibrate their risk scores and risk levels for those working in high-risk industries. There are several customers who cannot be easily identified, are still under clarification.</p>	<p>1. 預計於 2025 年 3 月 31 日完成。</p>
<p>2. 客戶年收入或信用額度身分背景資訊有重大變化時，未重新評估其風險評分及調整客戶 AML 風險等級</p> <p>Customers Credit Line /Income were increased but its AML score and customer risk rating were still unchanged</p>	<p>2. AML 專責部門依金檢查核意見，針對既有客戶進行清查，就所述年收入或信用額度身分背景資訊曾有重大變化之客戶，重新校正其風險分數及風險等級，惟尚有因資</p>	<p>2. 預計於 2025 年 3 月 31 日完成。</p>

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	料庫因素致有若干客戶尚待確認， 預計於 2025 年 3 月 31 日前完成。 AML dept. has completed inventory of existing customers, when there are major changes in a customer's annual income or credit limit, to renew their risk scores and risk levels. Due to database issue, there are several customers to be clarified.	