



Financial Institution Name:

Chang Hwa Commercial Bank, Ltd









Location (Country) :

No.57, Sec. 2, Zhong Shan North Road, Taipei City, Taiwan (R.O.C.)

No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal name	Chang Hwa Commercial Bank, Ltd
2	Append a list of foreign branches which are covered by this questionnaire (if applicable)	Domestic 185 branches (https://www.bankchb.com/frontend/branch.jsp), 10BU, 1 subsidiary, 7 overseas branches and 1 representative office (https://www.bankchb.com/frontend/overview.jsp) including N.Y., L.A., London, Tokyo, H.K., Singapore, Manila branches and CHB Subsidiary in China).
3	Full Legal (Registered) Address	No.38, Sec. 2, Ziyou Rd., Central Dist., Taichung City , Taiwan (R.O.C.)
4	Full Primary Business Address (if different from above)	No.57, Sec. 2, Zhongshan N. Rd., Zhongshan Dist., Taipei City, Taiwan (R.O.C.)
5	Date of Entity incorporation / establishment	1950, May
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes <input type="button" value="v"/>
6 a1	If Y, indicate the exchange traded on and ticker symbol	Taiwan Stock Exchange Corp., 2801
6 b	Member Owned / Mutual	No <input type="button" value="v"/>
6 c	Government or State Owned by 25% or more	No <input type="button" value="v"/>
6 d	Privately Owned	No <input type="button" value="v"/>
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	N.A.
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	Yes <input type="button" value="v"/>
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	Offshore Banking Branch, Chang Hwa Commercial Bank, Ltd.

2. AML, CTF & SANCTIONS PROGRAMME		
9	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
9 a	Appointed Officer with sufficient experience / expertise	Yes
9 b	Cash Reporting	Yes
9 c	CDD	Yes
9 d	EDD	Yes
9 e	Beneficial Ownership	Yes
9 f	Independent Testing	Yes
9 g	Periodic Review	Yes
9 h	Policies and Procedures	Yes
9 i	Risk Assessment	Yes
9 j	Sanctions	Yes
9 k	PEP Screening	Yes
9 l	Adverse Information Screening	Yes
9 m	Suspicious Activity Reporting	Yes
9 n	Training and Education	Yes
9 o	Transaction Monitoring	Yes
10	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes
11	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
11a	If Y, provide further details	

3. ANTI BRIBERY & CORRUPTION

12	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	Yes	
13	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes	
14	Does the Entity provide mandatory ABC training to:		
14 a	Board and Senior Committee Management	Yes	
14 b	1st Line of Defence	Yes	
14 c	2nd Line of Defence	Yes	
14 d	3rd Line of Defence	Yes	
14 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable	
14 f	Non-employed workers as appropriate (contractors / consultants)	Not Applicable	

4. AML, CTF & SANCTIONS POLICIES & PROCEDURES			
15	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:		
15 a	Money laundering	Yes	<input type="button" value="v"/>
15 b	Terrorist financing	Yes	<input type="button" value="v"/>
15 c	Sanctions violations	Yes	<input type="button" value="v"/>
16	Does the Entity have policies and procedures that:		
16 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes	<input type="button" value="v"/>
16 b	Prohibit the opening and keeping of accounts for unlicensed banks and / or NBFIs	Yes	<input type="button" value="v"/>
16 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes	<input type="button" value="v"/>
16 d	Prohibit accounts / relationships with shell banks	Yes	<input type="button" value="v"/>
16 e	Prohibit dealing with another Entity that provides services to shell banks	Yes	<input type="button" value="v"/>
16 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes	<input type="button" value="v"/>
16 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	<input type="button" value="v"/>
16 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes	<input type="button" value="v"/>
16 i	Define escalation processes for financial crime risk issues	Yes	<input type="button" value="v"/>
16 j	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes	<input type="button" value="v"/>
16 k	Outline the processes regarding screening for sanctions, PEPs and negative media	Yes	<input type="button" value="v"/>
17	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes	<input type="button" value="v"/>
18	Does the Entity have a record retention procedures that comply with applicable laws?	Yes	<input type="button" value="v"/>
18 a	If Y, what is the retention period?	5 years or more	<input type="button" value="v"/>

5. KYC, CDD and EDD			
19	Does the Entity verify the identity of the customer?	Yes	<input type="button" value="v"/>
20	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	<input type="button" value="v"/>
21	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
21 a	Ownership structure	Yes	<input type="button" value="v"/>
21 b	Customer identification	Yes	<input type="button" value="v"/>
21 c	Expected activity	Yes	<input type="button" value="v"/>
21 d	Nature of business / employment	Yes	<input type="button" value="v"/>
21 e	Product usage	Yes	<input type="button" value="v"/>
21 f	Purpose and nature of relationship	Yes	<input type="button" value="v"/>
21 g	Source of funds	Yes	<input type="button" value="v"/>
21 h	Source of wealth	Yes	<input type="button" value="v"/>
22	Are each of the following identified:		
22 a	Ultimate beneficial ownership	Yes	<input type="button" value="v"/>
22 a1	Are ultimate beneficial owners verified?	Yes	<input type="button" value="v"/>
22 b	Authorised signatories (where applicable)	Yes	<input type="button" value="v"/>
22 c	Key controllers	Yes	<input type="button" value="v"/>
22 d	Other relevant parties	Yes, such as legal representative, legal guardian and proxy.	
23	Does the due diligence process result in customers receiving a risk classification?	Yes	<input type="button" value="v"/>
24	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	<input type="button" value="v"/>
25	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	<input type="button" value="v"/>
26	Does the Entity have a process to review and update customer information based on:		
26 a	KYC renewal	Yes	<input type="button" value="v"/>
26 b	Trigger event	Yes	<input type="button" value="v"/>

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27	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?	
27 a	Non-account customers	EDD on a risk based approach 
27 b	Non-resident customers	EDD on a risk based approach 
27 c	Shell banks	Prohibited 
27 d	MVTS/ MSB customers	Prohibited 
27 e	PEPs	EDD on a risk based approach 
27 f	PEP Related	EDD on a risk based approach 
27 g	PEP Close Associate	EDD on a risk based approach 
27 h	Correspondent Banks	EDD on a risk based approach 
27 h1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes 
27 i	Arms, defense, military	EDD on a risk based approach 
27 j	Atomic power	EDD on a risk based approach 
27 k	Extractive industries	EDD on a risk based approach 
27 l	Precious metals and stones	EDD on a risk based approach 
27 m	Unregulated charities	Prohibited 
27 n	Regulated charities	EDD on a risk based approach 
27 o	Red light business / Adult entertainment	Prohibited 
27 p	Non-Government Organisations	EDD on a risk based approach 
27 q	Virtual currencies	Prohibited 
27 r	Marijuana	Prohibited 
27 s	Embassies / Consulates	EDD on a risk based approach 
27 t	Gambling	EDD on a risk based approach 
27 u	Payment Service Provider	EDD on a risk based approach 
27 v	Other (specify)	
28	If restricted, provide details of the restriction	

6. MONITORING & REPORTING		
29	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
30	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
31	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
31 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes
32	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes

7. PAYMENT TRANSPARENCY		
33	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes <input type="button" value="v"/>
34	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
34 a	FATF Recommendation 16	Yes <input type="button" value="v"/>
34 b	Local Regulations	Yes <input type="button" value="v"/>
34 b1	Specify the regulation	the Money Laundering Control Act and Counter-Terrorism Financing Act
34 c	If N, explain	

8. SANCTIONS

35	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	
36	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes	
37	Select the Sanctions Lists used by the Entity in its sanctions screening processes:		
37 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data	
37 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	
37 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data	
37 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data	
37 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data	
37 f	Other (specify)	HKMA, MAS, and CHB internal list, etc...	
38	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries / regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No. However, CHB has set up a representative office in Myanmar for the purpose of marketing research which does not conduct any banking activities.	

9. TRAINING & EDUCATION		
39	Does the Entity provide mandatory training, which includes :	
39 a	Identification and reporting of transactions to government authorities	Yes
39 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
39 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
39 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
40	Is the above mandatory training provided to :	
40 a	Board and Senior Committee Management	Yes
40 b	1st Line of Defence	Yes
40 c	2nd Line of Defence	Yes
40 d	3rd Line of Defence	Yes
40 e	3rd parties to which specific FCC activities have been outsourced	Not Applicable
40 f	Non-employed workers (contractors / consultants)	Not Applicable

10. AUDIT		
41	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 and Sanctions policies and practices on a regular basis?	<div>Yes</div> <div></div>

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Chang Hwa Commercial Bank

(Financial Institution name)

Hsiang-Chun, Wu

I, (Senior Compliance Manager- Second Line representative), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.

Hsiang-Chun, Wu 2022/6/16

(Signature & Date)