

西班牙對外銀行在臺分行內部控制制度聲明書
BBVA Bank, Taipei Branch
Statement of Internal Control

謹代表西班牙對外銀行在臺分行聲明本銀行於 113 年 1 月 1 日至 113 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」、「外國銀行在臺分行適用銀行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，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，定期陳報總行及區域中心。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 Banco Bilbao Vizcaya Argentaria, S.A., Taipei Branch ("the Bank"), we hereby certify that from 1 January 2024 to 31 December 2024, 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, and having internal auditors to undertake audit works and comply with the Article 38 (5) and Article 38-1 of Implementation Rules of Internal Audit and Internal Control System of Financial Holding Companies and Banking Industries, and Self-regulatory Rules on Information Security issued by the Banking Association and with the results reported to the Headquarter and the 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 Information Security 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

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聲明人

Statement by

在臺訴訟及非訴訟代理人：

Representative of litigious and non-litigious matters in Taiwan / Country
Manager

高國洲 James Kao

(簽章)

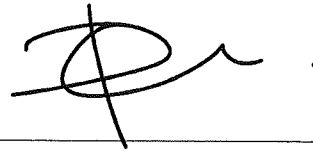


總稽核 / 或負責臺灣區稽核業務之主管：

Auditor in charge of auditing on Taiwan branch

Pedro Alonso Rubio

(簽章)

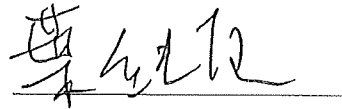


臺灣區資訊安全單位專責主管：

The Chief Officer in charge of Implementation of Information Security in
Taiwan

葉純真 Jennifer Yeh

(簽章)

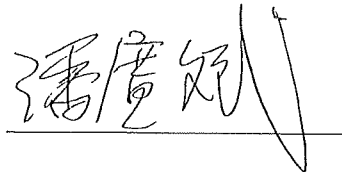


臺灣區遵守法令主管：

Head of Compliance in Taiwan

潘廣斌 David Pan

(簽章)



中 華 民 國 114 年 3 月 26 日

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西班牙對外銀行在臺分行內部控制制度應加強事項及改善計畫

BBVA Bank, Taipei Branch

Enhancement Items and Improvement Plans under the Internal Control System

(基準日：113年12月31日)

(Base Date: 31 December 2024)

應加強事項 Enhancement Items	改善措施 Improvement Plans	預定完成改善時間 Target Date
<p>依總行於民國113年4月出具之「電腦系統資訊安全評估報告」，其整體評估結果除以下須改善外，餘未發現重大異常之情事。</p> <p>Based on BBVA Madrid's "Independent Compliance Assessment on Information Security of Computer Systems" for BBVA Taipei Branch received in February 2024, overall result is "adequate" with some minor improvements noted.</p> <p>1. 總行受台北分行委託處理電腦資訊系統作業服務級別合約中所陳述之系統支援軟體，尚未及時更新以符合實際應用情形。 SLA between Taipei Office and BBVA Madrid which specifies the service levels (availability) of the applications hosted in BBVA Madrid and which provide service to the Taipei office is still waiting to be finalized and signed pending Headquarters review.</p> <p>2. 針對銀行整體網絡運作包含伺服器與互聯網等設備、及其連線至網際網路之檢測，總行發現以下缺失： a) 所有電腦設備應使用 BitLocker 內建作業系統之磁碟加密或 McAfee</p>	<p>1. 總行將進行該合約之更新與覆核作業，俟覆核作業完成，提供予台北分行。 SLA will be reviewed and updated by BBVA Madrid.</p> <p>2. 總行會針對所有缺失進行覆核以確保銀行網絡系統之安全。 All improvements to be reviewed and rectified by BBVA Madrid to make sure they do not</p>	<p>1. 總行已完成該合約之更新與覆核作業。 SLA has been reviewed and updated by BBVA Madrid.</p> <p>2. 總行已覆核完成。 BBVA Madrid has completed the review of all detected vulnerabilities and addressed them</p>

應 加 強 事 項 Enhancement Items	改 善 措 施 Improvement Plans	預 定 完 成 改 善 時 間 Target Date
<p>Drive 防毒軟體加密應用程式保護之。</p> <p>b) 員工應採用高強度密碼。</p> <p>c) 有權存取唯讀網域控制站 (RODC) 之特殊權限管理之帳號不應於其他公共網絡中使用。</p> <p>d) 應審核存放於網路公用資料夾之文件讀/寫權限。</p> <p>e) 當地應避免相同管理員帳號使用於不同系統，且其權限應重新認證。</p> <p>f) 不同管理員之核准權限階層應明確定義之。</p> <p>g) 應重新認證當地管理員之核准權限。</p> <p>The Offensive Security CIB team performed penetration test on the Taipei Office systems and noted some improvements including:</p> <p>a) All computer should be protected with BitLocker or McAfee Drive Encryption.</p> <p>b) Staffs should be made aware of use of strong passwords.</p> <p>c) Privileged accounts with access to any RODC should not be used to access any other computer on the network.</p> <p>d) Publicly available information on network sharefolders should be reviewed to control correct level of read/write permissions.</p> <p>e) Use of replicated local administer accounts on</p>	<p>compromise bank's system security.</p>	<p>accordingly.</p>

應加強事項 Enhancement Items	改善措施 Improvement Plans	預定完成改善時間 Target Date
<p>different systems should be avoided and local administrator access permissions should be recertified.</p> <p>f) Correct definition of permissions should be made at the hierarchical level between different administrator levels.</p> <p>g) Local administrator access permissions should be recertified.</p>		

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