

ACAMS® 鱼台灣金融研测院

第十一届台灣 《加強防制洗錢 / 打擊金融犯罪實用工具和技巧》 地區會議

Sharing Best Practices: How Securities Companies, Insurance Companies and Banks can Share Best Practices on AML/CTF

最佳實務共享: 證券保險業與銀行業針對防制洗錢/ 打擊資助恐怖活動分享最佳實務

16 Jan 2020

Moderator主持人:

Joyce Hsu, CAMS-FCI, AML Director – North Asia, **ACAMS** 公認反洗錢節協會 北亞區反洗錢合規策略總監 許朧方 (CAMS-FCI)

Speakers講者:

CHENG Chiao Ching, CAMS, Senior Vice President/Chief Compliance Officer, Fubon Securities Co., Ltd

富邦綜合證券股份有限公司 法遵暨法務部副總經理 鄭樵卿 (CAMS) CHIN Pei-Hua, CAMS, V.P. & Deputy Division Chief, First Commercial Bank 第一商業銀行法遵處洗錢防制部副處長 金佩華 (CAMS) Joseph Kao, Chief Compliance Officer, Shin Kong Life Insurance Co., Ltd.

新光人壽保險股份有限公司 法遵長 高全國

2

Agenda

 Defining institutional risk appetite and tolerance to build awareness by frontline staff

定義機構風險胃納與承受能力,以利一線員工建立適當認知

- Conducting risk-based assessment and training to improve the AML culture of compliance in areas such as CIP, KYC/CDD, and product lines 執行風險評估與培訓,在客戶身分識別、了解您的客戶/客戶盡職調查與產品等方面,強化防制洗錢的法規遵循文化
- Auditing AML controls and producing governance metrics to improve efficiency and effectiveness

查核防制洗錢控管程序並建立治理指標,以提升效益

第十一届台灣《加強防制洗錢/打擊金融犯罪實用工具和技巧》地區會議



2

請問各位在您所屬的機構裡高風險客戶約佔所有客戶的比率 是多少呢?

What is the ratio of your high-risk customers to all customers?

- a) 小於或等於千分之一 Less than or equal to one thousandth
- b) 大於千分之一到千分之三 Greater than one-thousandth to threethousandth
- c) 大於千分之三到千分之10 Greater than three thousandths to ten thousandths
- d) 大於千分之10到千分之50 Greater than ten thousandths to fifty thousandths
- e) 大於千分之50 Greater than fifty thousandths
- f) 不清楚 Don't know

第十一届台灣《加強防制洗錢/打擊金融犯罪實用工具和技巧》地區會議

Question 2

請問貴公司是否有設立AML/CTF風險胃納及容忍度? Does your company have AML / CTF risk appetite and tolerance?

- a) 有 Yes
- b) 沒有No
- c) 不清楚 Don't know

(承上)如果有, 貴公司現在是採量化或是質化來表現風險胃納, 或是二者並存?

If so, does your company now quantify or qualitatively represent risk appetite, or coexist?

- a) 量化表現 Quantitative figures
- b) 質化表現 Qualitative performance
- c) 二者並存Both of them
- d) 二者皆無None of them
- e) 不清楚 Not sure

第十一届台灣《加強防制洗錢/打擊金融犯罪實用工具和技巧》地區會議

Question 4

貴公司目前在洗防及打擊資恐上的訓練安排是否能滿足您工作上的需求?

Does your company's current training arrangements in defense and anti-terrorism meet your job needs?

請以1-10分評估滿足的程度。(1:完全不適用…10:完全能提供我工作上 所需要的)

關於STR,通報之後大家有關心他的後續嗎? Are you concerned about STR follow-ups after reporting?

- a) 有 Yes
- b) 沒有No
- c) 不一定 Depends

第十一届台灣《加強防制洗錢/打擊金融犯罪實用工具和技巧》地區會議

Question 6

STR的成功率大概是多少呢? What is the success rate?

- a) 1-5%
- b) 6-10%
- c) 11-15%
- d) 16% 以上/ or above

e) 不清楚,因為沒有統計

Not Sure, no Stats

f) 不清楚, 因為不負責申報

Not Sure, not my responsibility

10

你認為STR通報後持續通報超過一年,是否應由法規明定金融機構可以終止往來?

STR has been amended from a year ago. Should the regulations stipulate that financial institutions can terminate transactions?

- a) 應該 Should
- b) 不應該 Should not

第十一届台灣《加強防制洗錢/打擊金融犯罪實用工具和技巧》地區會議

Question 8

您認為稽核是否真能做好完整性及有效性的評估? Do you think the audit can really assess the completeness and effectiveness?

- a) 能 Yes
- b) 不能No
- c) 部份能 Partly

12

您認為貴公司法遵對RBA的了解程度?

How much do you think your company's compliance department understands RBA?

- a) 100%
- b) 75%以上/ or above
- c) 50%-75%
- d) 50%以下/ or below

第十一届台灣《加強防制洗錢/打擊金融犯罪實用工具和技巧》地區會議

Question 10

您認為查核單位對RBA的了解程度? How much do you think the audit department understand RBA?

- a) 100%
- b) 75%以上/ or above
- c) 50%-75%
- d) 50%以下/ or below

14

Thank you!

Questions?