

**THE SHANGHAI COMMERCIAL & SAVINGS BANK, LTD.**

**TAIPEI, TAIWAN**

**R.O.C.**

**KNOW YOUR CUSTOMER / ANTI-MONEY LAUNDERING &  
COUNTERING THE FINANCING OF TERRORISM**

**QUESTIONNAIRE**

**PART I**

<b>Section I – General Administrative Information</b>	
Legal Name of Institution	<b>THE SHANGHAI COMMERCIAL &amp; SAVINGS BANK, LTD.</b>
Legal Form	<b>Commercial Bank/Private Company</b>
SWIFT BIC	<b>SCSBTWP</b>
Principal Place of Business (Address)	<b>3F to 12F, No. 149, Sec. 2, Minsheng E. Rd., Zhongshan Dist., Taipei City 104, Taiwan, R.O.C.</b>
Official Web-site	<b><a href="http://www.scsb.com.tw">http://www.scsb.com.tw</a></b>
Registered at / Banking License issuing authority / Date and number	<b>Registered in Taiwan Banking License issued by Banking Bureau, Financial Supervisory Commission, R.O.C. Date: 2019.11.19 Number: 108053</b>
Does your Institution maintain a physical presence <sup>1</sup> in the licensing country? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
Is your institution an agency, branch or subsidiary of a bank with a physical presence? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
If yes, please answer the following questions : <ul style="list-style-type: none"><li>· Name of affiliate / parent company:</li><li>· Is affiliate / parent company publicly traded? YES <input type="checkbox"/> NO <input type="checkbox"/></li><li>If yes, list exchanges and symbols:</li><li>· Indicate affiliation: agency <input type="checkbox"/> branch <input type="checkbox"/> subsidiary <input type="checkbox"/></li><li>· Licensing country of affiliate:</li></ul>	

Is your institution a publicly traded entity <sup>2</sup> ?      YES <input checked="" type="checkbox"/> NO	
<b>SCSB is a listed company in Taiwan Stock Exchange Corporation with symbol 5876.</b>	
Officer Responsible for Account / Relationship : Ivy Lee	Secondary Contact : Yen-Ling Tu
Telephone No. : +886-2-25817111 ext 5233	Telephone No. : +886-2-25817111 ext 2311
E-mail Address : ivy@scsb.com.tw	E-mail Address : tracytu@scsb.com.tw
Has your financial institution appointed a senior officer responsible for its Anti-Money Laundering (AML) and Counter-Terrorist Financing (CFT) program?	Yes <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Name of the beneficial owners of your financial institution who own, control or have the voting right of 25 pct or more of any class of voting shares or other voting interest, and top 10 largest shareholders?	We do not have the beneficial owners who own, control or have the voting right of 25 pct or more of any class of voting shares or other voting interest. The top 10 largest shareholders as of 2020/04/21 are as follows:

Name	Shares	Percentage
TASSBURY INVESTMENTS CO. S.A.	211,373,625	4.72%
BRIGHT HONEST INVESTMENT LIMITED	172,834,744	3.86%
TILSBURY INVESTMENTS INC.	159,868,341	3.57%
LOGAN INVESTMENTS ENTERPRISES LTD.	126,208,739	2.82%
SHEEN PERFECT ENTERPRISES LIMITED	120,606,961	2.69%
MAGNETIC HOLDINGS LIMITED	120,001,486	2.68%
VANGUARD TOTAL INTERNATIONAL STOCK INDEX FUND, A SERIES OF VANGUARD STAR FUNDS	59,763,560	1.33%
HON DA INVESTMENT CO., LTD.	52,378,149	1.17%
VANGUARD EMERGING MARKETS STOCK INDEX FUND, A SERIES OF VANGUARD INTERNATIONAL EQUITY INDEX FUNDS	47,227,350	1.05%
NORGES BANK	37,621,000	0.84%

<sup>1</sup> Physical presence means your institution maintains a physical place of business, other than an electronic address, in a country where it is authorized to conduct banking activities, at which it employs at least one employee on a full-time basis and maintains records of its banking activities, and is subject to supervision by the regulators of the country authorizing the institution's license.

<sup>2</sup> If your institution is an agency, branch or subsidiary of a publicly traded entity that is listed on one of the exchanges listed in Appendix B, the answer to the question should be "Yes".

## Section II – Scope of Business Activities

Please list the principal countries in which your institution maintains branches, agencies and subsidiaries. Additionally, please indicate the type of operation and the number of offices or locations. (Please attach additional pages if necessary.)

Country	Type (Branch, Agency, Subsidiary, etc.)	Number
Taiwan	Branch	72
Hong Kong	Branch	1
Vietnam	Branch	1
Singapore	Branch	1
Thailand	Representative Office	1
Indonesia	Representative Office	1
Cambodia	Representative Office	1
Cambodia	Subsidiary/Subsidiary's Branches	1/149
Hong Kong	Subsidiary/Subsidiary's Branches	1/44

Please list the principal areas of business in which your institution participates in terms of contribution to revenue.

Principal areas of business activity (Commercial, Personal, Corporate, Wholesale, Insurance, etc.)	Approximate percent of revenue
Corporate	55.89%
Personal	16.27%
Wealth Management	10.41%
Other	17.43%

## Section III– Ownership and Management Information (Only for use when the subject institution is not a publicly traded entity on one of the stock exchanges listed in Appendix B)

If your institution is not a publicly traded entity on one of the stock exchanges listed in Appendix B, please list the names of the owners of your institution and their ownership interest. (For purposes of this questionnaire, an “owner” is any person or juridical entity that, directly or indirectly, owns, controls or has voting power of twenty percent (20%) or more of any class of securities of your institution.)

Name of Institution	Ownership Interest (%)	Nature of Ownership (Direct/Indirect)
Nil		

If any of the foregoing owners is a juridical entity, please list the names of the shareholders of the legal entity, and their ownership interest in the legal entity<sup>3</sup>. (Please attach additional sheets if necessary).

Name of Entity	Shareholders	Ownership Interest (%)	Nature of Ownership (Direct/Indirect)
Nil			

- 3 If the second tier shareholders are also juridical entities, the third tier shareholder's names, ownership interests, and nature of ownership shall also be listed. This exercise should continue through the required number of iterations until the true beneficial owners are identified. Note: If any legal entity is publicly held, please indicate only that it is publicly held and the exchange on which shares are traded.

Please list the names of the principal officers and directors of your bank, their respective positions, nationality/registered domicile. (Please attach additional sheets if necessary).

<b>Name</b>	<b>Position</b>	<b>Nationality/ Registered Domicile</b>
<b>Hung-Ching Yung</b>	<b>Chairman</b>	<b>Taiwan, R.O.C.</b>
<b>Stephen Ching-Yen Lee</b>	<b>Vice Chairman</b>	<b>Singapore</b>
<b>Yih-Pin Chen</b>	<b>Managing Director</b>	<b>Taiwan, R.O.C.</b>
<b>Yung-San Lee</b>	<b>Independent Managing Director</b>	<b>Taiwan, R.O.C.</b>
<b>Miles King-Hu Hsieh</b>	<b>Independent Director</b>	<b>Taiwan, R.O.C.</b>
<b>Mu-Tsai Chen</b>	<b>Independent Director</b>	<b>Taiwan, R.O.C.</b>
<b>Lincoln Chu-Kuen Yung</b>	<b>Director</b>	<b>Taiwan, R.O.C.</b>
<b>Kar-Wah Cheng</b>	<b>Director</b>	<b>Taiwan, R.O.C.</b>
<b>John Con-Sing Yung (The Representative of Magnetic Holdings Ltd.)</b>	<b>Director</b>	<b>Hong Kong</b>
<b>George Chao-Chi Gu</b>	<b>Director</b>	<b>Taiwan, R.O.C.</b>
<b>Yi-Jen Chiou</b>	<b>Director</b>	<b>Taiwan, R.O.C.</b>
<b>Shan-Chung Chen</b>	<b>Director &amp; President</b>	<b>Taiwan, R.O.C.</b>

#### **Section IV– FATCA and Compliance Information**

##### **FATCA Information**

**1. GIIN No.: J6NT1S.00000.LE.158**

**2. FATCA Status: Reporting Model 2 FFI**

**3. Contact Person: Juyu Tsai**

( Telephone No.: +886-2-25817111 ext 5102 )

( Email Address: [juyu@scsb.com.tw](mailto:juyu@scsb.com.tw) )

##### **Compliance Officer Information**

**1. Name: Fang-Hui Hsieh**

**2. Title: Executive Vice President**

**3. Telephone No.: +886-2-25817111 ext 1081**

**4. Email Address: [fanghui@scsb.com.tw](mailto:fanghui@scsb.com.tw)**

## **PART II**

<b>KNOW YOUR CUSTOMER / ANTI-MONEY LAUNDERING &amp; COUNTERING THE FINANCING OF TERRORISM CONTROLS</b>		
1. Does the AML CFT, and KYC compliance program require approval of your institution's Board or a senior committee thereof?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
2. Does your Institution have a legal and regulatory compliance program that includes a designated Compliance officer that is responsible for coordinating and overseeing the AML program on a day-to-day basis, which has been approved by senior management of the FI?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
3. Has your Institution developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions that has been approved by senior management?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
4. In addition to inspections by the government supervisors / regulators, does your institution have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
5. Does your Institution have a policy prohibiting accounts/relationships with shell banks (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
6. Does your Institution have policies covering relationships with politically exposed persons consistent with industry best practices?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
7. Does your Institution have appropriate record retention procedures pursuant to applicable law?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
8. Does your Institution require that its AML policies and practices be applied to all branches and subsidiaries of the FI both in the home country and in locations outside of the home country? Our Group-Level AML CFT Policy covering all branches and subsidiaries, and if there is any regulatory requirement in the overseas jurisdictions differ from those in Taiwan (R.O.C), the stricter standard shall prevail.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
9. Does your Institution have a risk focused assessment of its customer base and transactions of its customers?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
10. Does your Institution determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that your Institution has reason to believe pose a heightened risk of illicit activities at or through the FI?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
11. Has your Institution implemented systems for the identification of its customers, including customer information in the case of recorded transactions, account opening, etc. (for example; name, nationality, street address, telephone number, occupation, age/ date of birth, number and type of valid official identification, as well as the name of the country / state that issued it)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
12. Does your Institution have a requirement to collect information regarding its customers' business activities?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
13. Does your Institution have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information collected at account opening?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

14. Does your Institution take steps to understand the normal and expected transactions of its customers based on its risk assessment of its customers?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
15. Does your Institution have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
16. Does your Institution have procedures to identify transactions structured to avoid large cash reporting requirements?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
17. Does your Institution screen transactions for customers or transactions the FI deems to be of significantly high risk (which may include persons, entities or countries that are contained on lists issued by government/international bodies) that special attention to such customers or transactions is necessary prior to completing any such transactions?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
18. Does your Institution have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products? (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
19. Does your Institution have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
20. Does your Institution have a monitoring program for suspicious or unusual activity that covers funds transfers and monetary instruments (such as travelers checks, money orders, etc.)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
21. Does your Institution provide AML training to relevant employees that include identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving the FI's products and services and internal policies to prevent money laundering?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
22. Does your Institution retain records of its training sessions including attendance records and relevant training materials used?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
23. Does your Institution have policies to communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
25. Does your Institution employ agents to carry out some of the functions of the FI? 25.1. If Yes, does the FI provide AML training to relevant agents that include identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving the FI's products and services and internal policies to prevent money laundering?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
26. Does your Institution provide payable through accounts ? ( if Yes, please comment)	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
27. Has your institution had any regulatory or criminal enforcement actions resulting from violations of AML laws or regulations in the last five years ? ( if Yes, please comment) Besides the following, there is no action taken against us by the regulatory supervisory authority in the last three years.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

<p>2017,October</p> <p>We were fined NTD 1 Million dollars( almost USD 34 thousand dollars) in 2017, please see the following detail:</p> <p>For an AML compliance audit from our FSC (The Financial Supervisory Commission of R.O.C) on Mar. 2016, it was found that our branch's staffs did not completely describe their full investigation toward the alerted cases of customer's transactions due to carelessness. However, our policies and procedures for the compliance of AML/CFT regulation are always adequate and satisfied with the regulations of the relevant authorities of our country (including the FSC). Furthermore, we have continuously enhanced to train all of our staffs about the AML/CFT regulatory requirements after such event.</p> <p>The following FSC website relating this case is for your reference:</p> <p><a href="https://www.fsc.gov.tw/ch/home.jsp?id=131&amp;parentpath=0,2&amp;mcustomize=multimessages_view.jsp&amp;dataserno=201710250004&amp;aplistdn=ou=data,ou=penalty,ou=multisite,ou=chinese,ou=ap_root,o=fsc,c=tw&amp;dtable=Penalty">https://www.fsc.gov.tw/ch/home.jsp?id=131&amp;parentpath=0,2&amp;mcustomize=multimessages_view.jsp&amp;dataserno=201710250004&amp;aplistdn=ou=data,ou=penalty,ou=multisite,ou=chinese,ou=ap_root,o=fsc,c=tw&amp;dtable=Penalty</a></p> <p>2019, April</p> <p>After our regulatory authority FSC (The Financial Supervisory Commission of R.O.C) regular review, there were 2 findings raised and required to be corrected in April 2019. Please be noted that our positive improvement was recognized by the FSC, so there were no fines against us, and these findings are categorized as "Non-major Enforcement Actions" by FSC :</p> <ol style="list-style-type: none"> <li>1. There is a case that our staff did not get enough information from the client with a complicated shareholder structure, therefore, the Beneficiary Owner was not fully identified.</li> <li>2. Our branch's staffs did not completely describe and record their full investigation toward only few cases of alerted suspicious transactions.</li> </ol> <p>We have already corrected the above issues and these corrections were recognized by the FSC.</p> <p>We also continuously enhanced to train all of our staffs about the AML/CFT regulatory requirements after such event.</p> <p>The following FSC website relating this case is for your reference:</p> <p><a href="https://www.banking.gov.tw/ch/home.jsp?id=550&amp;parentpath=0,524,547&amp;mcustomize=multimessages_view.jsp&amp;dataserno=201904170001&amp;aplistdn=ou=data,ou=penalty,ou=multisite,ou=chinese,ou=ap_root,o=fsc,c=tw&amp;dtable=Penalty">https://www.banking.gov.tw/ch/home.jsp?id=550&amp;parentpath=0,524,547&amp;mcustomize=multimessages_view.jsp&amp;dataserno=201904170001&amp;aplistdn=ou=data,ou=penalty,ou=multisite,ou=chinese,ou=ap_root,o=fsc,c=tw&amp;dtable=Penalty</a></p>		
<p>28. Does your institution have offshore-clients? (Yes/No)</p> <p>28.1. If yes, do you have an enhanced due diligence for offshore-clients in place? (Yes/No)</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	
<p>29. Does your institution have walk-in clients? (Yes/No)</p> <p>29.1. If yes, please explain in detail your identification and verification process regarding your walk-in clients.</p> <p>(1)Identify and verify client' s identity using reliable, independent source documents, data or information. In addition, copies of the client' s identity documents or records of the relevant information shall be retained or recorded.</p> <p>(2)Verify that any person purporting to act on behalf of the client to carry on any transaction is so authorized. Check and verify their identity in accordance with method mentioned in the Preceding Item.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	

(3)Take reasonable measures to identify and verify the identity of the actual beneficiary of a client. (4)Enquire information on the purpose and intended nature of the business relationship when checking and verifying the client' s identity.		
30. Does your institution offer anonymous accounts to your customer?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
31. Has your country established laws designed to prevent money laundering and terrorist financing, and is your bank subject to such laws? (Yes/No)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
32. Please provide the name of the reporting agency or regulatory body for reporting suspicious transactions of your bank in your country. MJIB ( Ministry of Justice Investigation Bureau )		
33. Is there AML/CFT legislation enacted in the place of domicile of your institution? (Yes/No) 33.1. If Yes, please provide relevant information (e.g. website) Money Laundering Control Act (2018.11.07 modified) <a href="https://law.moj.gov.tw/LawClass/LawAll.aspx?pcode=G0380131">https://law.moj.gov.tw/LawClass/LawAll.aspx?pcode=G0380131</a> Terrorism Financing Prevention Act (2018.11.07 modified) <a href="https://law.moj.gov.tw/LawClass/LawAll.aspx?pcode=I0030047">https://law.moj.gov.tw/LawClass/LawAll.aspx?pcode=I0030047</a>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

**The undersigned, based on his/her best knowledge and belief, certifies that the aforementioned questions were answered considering the existing internal controls of the subject financial institution, and further present an accurate representation of the existing state of the institution's AML, CFT, and KYC internal controls and financial service activities.**

Signature :	
Position :	Chief Compliance Officer
Date :	2020.8.6
Name of Institution :	The Shanghai Commercial & Savings Bank, Ltd.
Address of Institution :	3F to 12F, No. 149, Sec. 2, Minsheng E. Rd., Zhongshan Dist., Taipei City 104, Taiwan, R.O.C.



# **KNOW YOUR CUSTOMER / ANTI-MONEY LAUNDERING & COUNTERING THE FINANCING OF TERRORISM — APPENDIX A**

**This is the list of the institution's agencies, branches, and subsidiaries to which the certification of adherence in the representation letter applies :**

**Please refer to our website: [www.scsb.com.tw](http://www.scsb.com.tw)**

<p>中國信託商業銀行 中國信託銀行有限公司 中國信託銀行（香港）有限公司 中國信託銀行（上海）有限公司 中國信託銀行（新加坡）有限公司 中國信託銀行（台北）有限公司 中國信託銀行（北京）有限公司 中國信託銀行（廣州）有限公司 中國信託銀行（深圳）有限公司 中國信託銀行（香港）有限公司 中國信託銀行（上海）有限公司 中國信託銀行（新加坡）有限公司 中國信託銀行（台北）有限公司 中國信託銀行（北京）有限公司 中國信託銀行（廣州）有限公司 中國信託銀行（深圳）有限公司</p>	<p>中國信託商業銀行 中國信託銀行有限公司 中國信託銀行（香港）有限公司 中國信託銀行（上海）有限公司 中國信託銀行（新加坡）有限公司 中國信託銀行（台北）有限公司 中國信託銀行（北京）有限公司 中國信託銀行（廣州）有限公司 中國信託銀行（深圳）有限公司 中國信託銀行（香港）有限公司 中國信託銀行（上海）有限公司 中國信託銀行（新加坡）有限公司 中國信託銀行（台北）有限公司 中國信託銀行（北京）有限公司 中國信託銀行（廣州）有限公司 中國信託銀行（深圳）有限公司</p>
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**KNOW YOUR CUSTOMER / ANTI-MONEY LAUNDERING &  
COUNTERING THE FINANCING OF TERRORISM — APPENDIX B**

**Stock Exchanges**

- Alberta Stock Exchange
- American Stock Exchange
- Athens Stock Exchange
- Australian Stock Exchange
- Bermuda Stock Exchange
- Bolsa de Comercio de Buenos Aires
- Bolsa de Comercio de Santiago
- Bolsa de Valores de Caracas
- Bolsa de Valores de Lima
- Bolsa de Valores de Rio de Janeiro
- Bolsa de Valores de São Paulo
- Bolsa Mexicana de Valores
- Bolsas y Mercados Españoles
- Boston Stock Exchange
- Bourse de Luxembourg
- Bourse de Montreal
- BSE The Stock Exchange, Mumbai
- Bucharest Stock Exchange
- Budapest Stock Exchange Ltd.
- Chicago Board Options Exchange
- Chicago Stock Exchange
- Colombo Stock Exchange
- Copenhagen Stock Exchange
- Cyprus Stock Exchange
- Deutsche Börse Ag
- Euronext Amsterdam
- Euronext Belgium
- Euronext Brussels
- Euronext Lisbon
- Euronext Paris
- HEX Plc
- Hongkong Exchanges and Clearing
- Irish Stock Exchange
- Istanbul Stock Exchange
- Italian Exchange
- Jakarta Stock Exchange
- Jamaica Stock Exchange
- JSE Securities Exchange, South Africa
- Korea Stock Exchange
- Kuala Lumpur Stock Exchange
- Ljubljana Stock Exchange
- London Stock Exchange
- Malta Stock Exchange
- NASD
- National Stock Exchange of India, Ltd.
- National Stock Exchange of Lithuania
- New York Stock Exchange
- New Zealand Stock Exchange
- Osaka Securities Exchange
- Oslo Bors
- Philippine Stock Exchange
- Prague Stock Exchange
- Shanghai Stock Exchange
- Shenzhen Stock Exchange
- Singapore Exchange
- Stock Exchange of Hongkong
- Stock Exchange of Tehran
- Stock Exchange of Thailand
- Stockholmsbörsen
- SWX Swiss Exchange
- Taiwan Stock Exchange Corp.
- Tel Aviv Stock Exchange
- Tokyo Stock Exchange
- TSX Toronto Stock Exchange
- Vancouver Stock Exchange
- Warsaw Stock Exchange
- Weiner Börse Ag
- Winnipeg Stock Exchange