



EXECUTIVE SUMMARY

1. This report provides a summary of the AML/CFT measures in place in Chinese Taipei as at the end of the on-site visit (16 November 2018). It analyses the level of compliance with the Financial Action Task Force (FATF) 40 Recommendations and the level of effectiveness of Chinese Taipei's AML/CFT system, and provides recommendations on how the system could be strengthened.

本報告對中華臺北在現地評鑑結束前（2018年11月16日）的防制洗錢/打擊資恐措施提出總結。報告分析 FATF 40 項建議的遵循程度和中華臺北 AML / CFT 系統的有效性，並就如何加強該系統提出建議。

Key Findings

重要發現

- 1) Chinese Taipei has pursued wide ranging reforms since early 2017, with very significant progress achieved in a short period of time. This reflects strong political commitment to AML/CFT reform, significant commitment of resources, effective coordination, and efforts to strengthen and deepen the culture and practice of money laundering / terrorist financing (ML/TF) risk management.

自 2017 年初以來，中華臺北一直在進行廣泛的改革措施，並在短時間內取得了非常顯著的進展。這反映出中華臺北對防制洗錢/打擊資恐改革具有強烈的政治承諾，投入大量的資源，並經有效的協調及努力，以加強並深化洗錢 / 資恐風險管理的文化和作為。

- 2) Chinese Taipei has a generally sound understanding of its ML/TF risks which is reflected in its public national risk assessment (NRA) and other assessments. National and agency-level AML/CFT policies and activities seek to address the risks identified in the assessments. Co-ordination and co-operation on AML/CFT issues at both the policy and operational levels has improved significantly since the last evaluation.

中華臺北對其洗錢/資恐風險有著普遍合理的瞭解，這反映在其國家風險評估（NRA）和其他評估中。國家和機關層級的防制洗錢/打擊資恐政策和活動旨在解決已於風險評估中辨識的風險。從最近的評估之後，在防制洗錢/打擊資恐政策和業務層面協調與合作的問題已大幅改善。

- 3) Financial intelligence and related information is used extensively in ML and predicate offence investigations and in tracing criminal proceeds. Law enforcement agencies (LEAs) are well-equipped and experienced in generating and using financial intelligence to follow money trails and uncover complex structures and networks. The Anti-Money Laundering Division of the MJIB (AML) - Chinese Taipei's financial intelligence unit (FIU) - produces good quality intelligence and adds value in financial investigations, particularly those involving international elements.

金融情報和相關資訊廣泛用於洗錢和前置犯罪的調查與犯罪所得追查。執法機關(LEAs)在產生和使用金融情報，以追查金流軌跡並發現複雜的結構和網絡方面，受有專業訓練和豐富經驗。法務部調查局洗錢防制處(AML) - 中華臺北的金融情報中心(FIU) - 提供高質量的情報，並為金融調查提供加值，特別是那些涉及國際因素的金融調查。

- 4) Law enforcement agencies (LEAs), including prosecutors, conduct complex ML investigations actively tracing money trails, lifting the corporate veil, unravelling layers of ownership and pursuing funds sent offshore. Prosecutors drive ML investigations and coordinate authorities according to expertise. The range of ML investigations and prosecutions is generally in line with the risk profile with the exception of relatively low numbers of ML related to drug trafficking and smuggling. However, authorities are not using the ML offence to the extent necessary across a broad range of conduct in the context of Chinese Taipei. The conviction rate for ML is low and the penalties applied have not been dissuasive. Chinese Taipei has used a variety of tools in identifying, tracing and forfeiting criminal assets which operate well in practice. Chinese Taipei is successful in forfeiting a significant value of assets when compared to the size of its economy. Forfeiture appears to be consistent with Chinese Taipei's risk profile.

執法機關，包括檢察官展現調查複雜洗錢案件的能力，包括追蹤金流軌跡，揭開公司面紗，揭開所有權階層和追查流向海外的資金。檢察官根據專業能力主導洗錢案件調查並協調權責機關。除毒品販運和走私有關的洗錢則較少外，洗錢案件調查和起訴範圍通常與風險概況一致，但是權責機關並未在中華臺北範圍內對一連串廣泛的違法行為，施以必要的洗錢罪行。洗錢案件的定罪率很低，而且所採用的懲罰並不具有勸阻性。中華臺北已經適當地使用各種工具來辨識，追查和沒收犯罪資產，實務上也運作良好。中華臺北成功地沒收與其經濟規模相當的重大價值資產，並且沒收情形與中華臺北的風險狀況一致。

- 5) A number of financial investigations of suspected TF cases have been successfully undertaken. They involved intelligence sharing and ultimately uncovered conduct that was unrelated to TF. There have been no TF convictions, which is in keeping with Chinese Taipei's TF risk profile.

中華臺北已成功進行一些涉嫌資恐案件的金融調查。他們參與了情報共享，並最終破獲與資恐無關的行為。目前沒有資恐相關的定罪，這與資恐風險的概況一致。

- 6) Chinese Taipei has strong policy and operational coordination mechanisms to support the implementation of targeted financial sanctions (TFS) to combat terrorism and proliferation of weapons of mass destruction (WMD). Authorities have issued guidance to all sectors and undertaken a great deal of outreach to all financial institutions (FI) and designated non-financial businesses and professions (DNFBP) sectors and have supported all sectors to have access to screening software to support implementation of TFS. FIs, especially banks, demonstrate a good understanding of TFS obligations and the implementation of customer and transaction monitoring to identify possible sanctions matches.

中華臺北擁有強大的政策和業務協調機制，以支持實施目標性金融制裁來打擊恐怖主義和大規模毀滅性武器擴散。權責機關已向所有部門發布指引，並對所有金融和指定之非金融事業及人員(DNFBP)進行了大量宣導活動，並支持所有部門取得名單篩選軟體以支持實施目標性金融制裁。金融機構，特別是銀行，對目標性金融制裁義務，與對可能符合制裁名單者執行客戶審查(CDD)與交易監控措施等表現出很好的瞭解。

- 7) Implementation of TFS for DPRK-related designations has resulted in 81 freezing actions worth over USD 3.96 million. While there are minor shortcomings in the scope of TFS for proliferation financing (PF), the legal framework goes beyond FATF standards by also establishing a PF offence, related suspicious transaction reporting (STR) obligations and a domestic designation system for TFS. Chinese Taipei has designated a local and entities working on his behalf/at his direction linked to PF and subjected them to TFS, resulting in freezing considerable assets. A large number of PF-related STRs have been received and intelligence has been developed to identify possible networks of associates. Authorities have granted access to frozen funds for basic expenses in keeping with the standards.

中華臺北實施與制裁北韓有關的目標性金融制裁，共有 81 次資產凍結行動，總價值超過 396 萬美元。雖然在武擴相關目標性金融制裁方面，出現了範疇上的缺失，中華臺北的法律框架已超越 FATF 標準，包括成立武擴罪、相關可疑交易申報(STR)報告義務、國內指定制裁體系及目標性金融制裁。中華臺北已經指定了一名與武擴相關的當地人士和代表及依其指示的實體，並對其實施目標性金融制裁並凍結大量資產。本案接獲大量與資助武擴相關的可疑交易申報，並藉此發展相關情資以辨識可能的親信網絡。權責機關並已根據標準給予當事人取得凍結資產以獲得基本生活費用。

- 8) Technical compliance elements for preventive measures are generally comprehensive. There has been a shift towards a risk-based approach in the banking sector since 2013, but this approach is newer in many other sectors. Sectoral supervisors have undertaken very significant amounts of awareness raising on AML/CFT obligations and ML/TF risks. Tailored guidance has been issued for each sector.

有關預防性措施的技術遵循條件大致完整建立。自 2013 年以來，銀行業已轉型運用以風險為本之方法，但這在許多其他部門則較新。各部門監理人員針對防制洗錢/打擊資恐義務和洗錢/資恐風險實施大量活動以提升其意識。各別部門並已發布相關指引。



9) Chinese Taipei has a generally robust system of AML/CFT supervision for FIs. AML/CFT supervision of DNFBP sectors has only recently commenced. The sanctions imposed on banks, securities and insurance for AML/CFT breaches are relatively low and may not be wholly effective or proportionate. More broadly than the level of fines, overall the effects of supervisory actions have significantly influenced compliance in a positive way through remedial measures, enforcement actions and reputation damage.

中華臺北在金融部門擁有普遍強大的防制洗錢/打擊資恐監理體系。DNFBP 部門最近才開始實施防制洗錢/打擊資恐監理活動。針對銀行，證券和保險業違反防制洗錢/打擊資恐措施的制裁相對較低，可能並非完全有效或符合比例。然而，比單純罰款影響更廣泛的是，補救性措施的整體效果、強制行動和聲譽損害能以正面的方式顯著影響各部門的法規遵循程度。

10) Authorities have a mixed understanding of the risks associated with legal persons and legal arrangements. Authorities rely on CDD conducted by FIs and DNFBPs to obtain up to date beneficial ownership information of legal persons and arrangements. LEAs and the AMLD demonstrated examples of using CDD information and investigative strategies to obtain information on the beneficial ownership and control of legal persons. The scope and quality of the information held on the company registry has greatly improved in the period prior to this assessment. There are a number of controls on legal persons to mitigate their risk of misuse related to nominee shares and nominee directors. Despite the large numbers of civil trusts formed in Chinese Taipei, there are few measures to support the transparency of trusts and capturing information on settlors or trustees.

權責機關對與法人和法律協議相關的風險有著不同的理解。藉由金融機構和 DNFBPs 進行的客戶審查，使權責機關獲得法人和法律協議的最新實質受益權資訊。執法機關和洗錢防制處展現使用客戶審查資訊和調查策略獲取有關法人實質受益權和控制權資訊的範例。最近公司登記處所掌握資訊的範圍和品質在評鑑之前有了很大改善。中華臺北有對法人實施一些控制措施，以減輕濫用代名股份和代名董事的風險。儘管在中華臺北成立大量的民事信託，但很少有措施支持信託的透明度並獲取有關信託人或受託人的資訊。

11) Chinese Taipei provides good quality constructive assistance for international cooperation requests related to ML and asset restraint and forfeiture.

中華臺北為有關洗錢、資產限制和沒收的國際合作請求，提供優質的建設性援助。

Risks and General Situation

風險與一般情況

2. Chinese Taipei has a well-developed financial sector and stable economy which makes it an attractive venue for both domestic and foreign proceeds of crime to be laundered. The banking sector, including the well-developed sector of offshore banking units (OBU), presents the greatest risks and there are particular risks from informal remittance. Banks dominate the financial sector, handle a high volume of transactions, and are well interconnected with the international financial system.

Chinese Taipei is subject to an array of predicate offences which generate significant proceeds. These offences to a large degree stem from organised crime, including drug trafficking, fraud and smuggling. Other predicate offences of note include corruption and bribery, and specific types of fraud including tax and securities-related crimes. Typical ML methods include the use of wire transfers to dummy accounts (including OBU accounts), cash couriers, underground remittance, foreign third parties, shell and front companies to conceal beneficial ownership and the purchase and sale of real estate. The high use of cash and the relatively large informal economy significantly increases the risk that illicit proceeds may be channelled into the formal economy.

中華臺北擁有發達的金融部門和穩定的經濟體系，使其對國內外洗錢犯罪具有吸引力。銀行業包括發達的離岸銀行業務部門風險最大，非正式匯款管道亦存在特定風險。銀行主導金融業，處理大量交易，並與國際金融體系緊密相連。中華臺北受到一系列產生鉅額所得的前置犯罪的影響。這些罪行在很大程度上源於有組織犯罪，包括販毒，詐欺和走私。其他前置犯罪包括貪污和賄賂，以及特定類型的詐欺，包括稅務和證券相關的犯罪。典型的洗錢方法包括使用電匯匯款至人頭賬戶（包括 OBU 賬戶），現金運送，地下匯款，外國第三方，空殼和前台公司隱瞞實質受益權（BO），購買和出售不動產等。大量使用現金和相對較大的非正式經濟，大大增加了非法所得可能重新流入正規經濟的風險。

3. There is no specific intelligence suggesting that Chinese Taipei is a likely target of terrorism, or evidence of foreign terrorist actors with connection to Chinese Taipei. The threat of financing domestic terrorism is low. Externally, there have not been any suspected cases of funds of designated persons or entities, or funds associated with terrorism cases entering or being sourced from the jurisdiction. Chinese Taipei has some links between certain segments of the community and regions affected by terrorism, which slightly increases the threat of TF, albeit within a low level.

沒有具體的情報顯示中華臺北可能成為恐怖主義的目標，或證明有與中華臺北聯繫的外國恐怖分子。為國內恐怖主義提供資金的威脅很低。就對外而言，沒有任何涉嫌與指定制裁人員或實體的資金，或與恐怖主義案件有關的資金，進入中華臺北或從中華臺北取得。中華臺北社會中的部分群體和受恐怖主義影響的地區之間存在某種聯繫，這略微增加了資恐的威脅，儘管仍處於較低的水準。

Overall Level of Effectiveness and Technical Compliance

整體效能及技術遵循程度

4. Chinese Taipei has established a legal and institutional framework that is particularly strong in relation to technical compliance. Minor shortcomings include the scope of property subject to TFS for terrorism and WMD proliferation and some technical elements of the TF offence.

中華臺北建立了一個在技術遵循方面特別強大的法律和制度框架。需要改善的領域包括對恐怖主義和大規模毀滅性武器擴散進行目標性金融制裁的財產範圍，以及資恐犯罪的一些技術性要素。

5. Chinese Taipei has implemented an AML/CFT system that shows a number of areas of effectiveness. Particularly good results are being achieved in the areas of understanding the ML/TF risks and pursuing domestic cooperation and coordination to address risks; the development and use of financial intelligence and related financial investigation for predicate offences and the restraint and confiscation of proceeds and instruments of crime; the implementation of TFS related to terrorism and protecting the non-profit sector from terrorist abuse; and co-operating internationally to support AML/CFT. Major improvements are needed to strengthen supervision and implementation of preventive measures and to prevent the misuse of legal persons and arrangements.

中華臺北實施的防制洗錢/打擊資恐體系，在若干領域均顯示為有效。其中下列領域取得特別好的成果，包括瞭解洗錢/資恐風險和展開國內合作及協調以應對風險；針對前置犯罪發展和使用金融情報並進行金融調查，以及限制和沒收犯罪所得和犯罪工具；實施與恐怖主義有關的目標性金融制裁，

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保護非營利組織免於遭受恐怖分子濫用；並在國際上展開合作以支持防制洗錢/打擊資恐。主要待改進部分包括強化監理及預防性措施的執行，以及避免法人和法律協議被濫用。

6. In the initial part of the 10 years since Chinese Taipei's last mutual evaluation little progress was made with AML/CFT reforms. However, since early 2017 very significant changes to policy and resource allocation have occurred which have supported comprehensive AML/CFT reforms and large scale implementation of the legal and institutional framework and the scope of implementation.

中華臺北自前一輪相互評鑑以來的最初 10 年期間，防制洗錢/打擊資恐的改革進展甚微。然而，自 2017 年初以來，政策和資源分配發生非常重大的變化，這些變化支持全面的防制洗錢/打擊資恐改革，以及大規模實施法律和制度框架與執行範圍。

Assessment of Risks, coordination and policy setting (Chapter 2 - IO.1; R.1, R.2, R.33)

風險評估、協調與制定政策（第 2 章-直接成果 1; R.1, R.2, R.33）

7. Chinese Taipei demonstrated a generally sound understanding of ML/TF risks. This is reflected in the NRA process, which included a very wide range of government and private sector stakeholders and resulted in a public document, a slightly more comprehensive document for participating stakeholders and a great deal of associated outreach and awareness raising work on the findings of risk. Sectoral risk assessments and FIU strategic intelligence products have added to a shared understanding of risk. Overall AML/CFT policies and activities largely seek to address the risks identified in the NRA and other assessments.

中華臺北對洗錢 / 資恐風險的理解基本合理。這反映在國家風險評估（NRA）過程中，包括政府和私部門利益相關者的廣泛參與，並對大眾提供了一份文件，並為參與的利益相關者提供了較為全面的文件，以及針對風險的發現結果提供大量相關宣導和提高認知的工作。部門風險評估和金融情報中心的策略性情報增加了對風險的共同理解。防制洗錢/打擊資恐的總體政策和活動主要是為了解決 NRA 和其他評估中發現的風險。

8. National co-ordination and co-operation on AML/CFT issues at the policy and operational levels has improved significantly since the last evaluation. This is particularly evident in relation to policy level co-ordination among LEAs, however there are opportunities for deeper cooperation at operational levels.

自上次評估以來，國家在防制洗錢/打擊資恐的政策和業務協調與合作已有了顯著改善。在執法機關（LEAs）之間的政策層面協調方面尤其明顯，但在業務層面則有更深入合作的機會。

Financial Intelligence, Money Laundering & Confiscation (Chapter 3 - IOs 6-8; R.3, R.4, R.29-32)

金融情報、洗錢與沒收（第三章-直接成果 6-8; R.3, R.4, R.29-32）

Use of financial intelligence to investigate ML, TF, predicate offence and to trace assets (Immediate Outcome 6)

使用金融情報調查洗錢、資恐及前置犯罪，並追查犯罪所得（直接成果 6）

9. The competent authorities, in particular LEAs, investigating prosecutors and the tax authorities regularly develop and use a broad range of financial intelligence and other relevant information to investigate predicate offences, ML and possible TF and to trace criminal proceeds.

LEAs (especially the MOJ Investigation Bureau (MJIB)) and investigating prosecutors have very well-developed capabilities to utilise FIU-disseminated intelligence in financial investigations.

權責機關（特別是執法機關、檢察官和稅務機關），能定期發展並利用廣泛的金融情報和其他相關資訊調查前置犯罪、洗錢案件及疑似的資恐案件，並能追蹤犯罪所得。執法機關當中（尤其是法務部調查局）和檢察官都具有非常好的能力，能在金融調查中善用金融情報中心發送的金融情報。

10. Chinese Taipei's FIU is the AMLD, which is located within the MJIB. The FIU has a well-developed analytical capability and has excellent IT resources and skilled staff. AMLD produces good quality financial intelligence. AMLD suffers, to an extent, from a lack of human resources as it also has a significant role in relation to outreach, risk assessment work, TFS support and international cooperation.

中華臺北的金融情報中心是法務部調查局洗錢防制處。金融情報中心擁有完善的分析能力、良好的資訊科技資源和優秀熟練的人員。法務部調查局洗錢防制處提供品質好的金融情報。但在一定程度上洗錢防制處仍受限於人力資源不足的影響，因為他們在對外宣導、風險評估工作、支援目標性金融制裁和國際合作等方面都扮演重要的角色。

11. While the full range of FIs and DNFBPs are required to report STRs, there was an underreporting of STRs by higher risk sectors until recent reforms and enhanced risk-based outreach to all sectors.

雖然所有金融機構和指定的非金融事業及人員（DNFBPs）均需通報可疑交易報告，但直到最近的法規變化和強化對所有部門進行以風險為本的宣導前，高風險產業的可疑交易報告申報仍不足。

Investigating, prosecuting and sanctioning ML (Immediate Outcome 7)

調查、起訴與制裁洗錢犯罪（直接成果7）

12. Chinese Taipei had not prioritised the pursuit of ML cases until 2017, at which time amendments were made to the MLCA which improved the ML offence. LEAs have very well-developed financial investigation and prosecution capacity; however the nature of the ML offence and a lack of policy priority prior to 2017 have meant that ML was pursued to a lesser extent. Results of ML prosecutions show low conviction rates and very low sentences applied. The level of prosecutions and convictions of ML has not been in keeping with its threats, risk profile and AML/CFT policies.

中華臺北過去並未將追查洗錢犯罪列為優先考量，直到 2017 年洗錢防制法完成修法情況才有所改變。執法機關具有非常完善的金融調查和起訴能力，但是洗錢犯罪的本質及 2017 年以前政策上未將調查洗錢做為優先考量，意味著洗錢犯罪的追查程度較低。洗錢起訴的結果並不有效，定罪率低，刑期亦非常低。洗錢犯罪的起訴和定罪水準未能與其威脅程度、風險概況及防制洗錢 / 打擊資恐政策保持一致。

Restraining and confiscating proceeds and instruments of crime (Immediate Outcome 8)

限制並沒收犯罪所得及工具（直接成果8）

13. Chinese Taipei pursues confiscation as a policy objective and competent authorities have confiscated approximately USD 457 million since 2014 using the Criminal Code and the Criminal Procedure Code (CPC) and had restrained approximately USD 191 million at the time of the onsite visit. Tax authorities have recovered considerable funds using their powers. Chinese Taipei has demonstrated its ability to recover assets across a range of crime areas in keeping with the risk profile. LEAs, including prosecutors, have well-developed asset tracing capacity and routinely pursue financial investigations to identify assets for the purpose of recovery.

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中華臺北將沒收作為政策目標。權責機關利用刑法和刑事訴訟法，自 2014 年以來至現地評鑑之前已沒收大約 4.57 億美元，並限制大約 1.91 億美元。稅務機關利用其職權收回了大量資金。中華臺北已證明其能夠在一系列犯罪追回資產，並與風險概況相符。執法機關，包括檢察官，具有良好的資產追查能力，並且固定進行金融調查以識別資產並予以追回。

14. Cash is seized at the border and the authorities have, to a certain extent, proactively targeted high-risk ports of entry. However, forfeiture applied in relation to breaches of the cross border declaration system is not applied proportionately in all cases. Overall, the extent of targeting threats posed by cash couriers has not been in keeping with the risk profile.

現金在邊境被扣押，且權責機關在一定程度上會主動鎖定高風險入境口岸。但是，在違反跨境申報制度方面的沒收並非在所有情況下都按比例原則適用。總體而言，鎖定現金攜帶者所構成威脅的行動並未與風險狀況保持一致。

Terrorist Financing and Financing Proliferation (Chapter 4 - IOs 9-11; R.5-8)

資恐及資助武擴 (第 4 章-直接成果 9-11; R.5-8)

Investigating, prosecuting and sanctioning terrorist financing (Immediate Outcome 9)

調查、起訴及制裁資恐犯罪 (直接成果 9)

15. TF risks are low overall, but despite this, TF investigations are given a high priority. LEAs, prosecutors, the FIU and security intelligence authorities have well-developed investigation capacity, and standard operating procedures to respond to possible cases of terrorism or TF.

儘管整體而言資恐風險低，資恐案件的調查仍被列為高度優先。執法機關、檢察官、金融情報中心和情報機關亦具備良好的調查能力，並有完善的標準作業程序，以因應可能的恐怖主義或資恐案件。

16. There have been a number of cases where authorities have proactively and systematically investigated TF alongside possible terrorism cases and, in two other incidents, investigated possible TF cases. In all of these cases, the conduct identified did not relate to terrorism or TF, but the investigations demonstrated the TF investigation capacity and the ability to thoroughly investigate in a coordinated joint agency context. The conduct of financial investigations is in keeping with Chinese Taipei's threats, risk profile and AML/CFT policies.

在一些案例中顯示，權責機關對於資恐案件及伴隨的疑似恐怖主義案件能主動且系統性地發動調查，並曾在另外兩起案例中調查過疑似的資恐案件。雖然所有這些案件，最後經調查確認與恐怖主義或資恐無關，但顯示中華臺北權責機關具有資恐調查能力，以及跨機關聯合協調調查的能力，其金融調查作為與中華臺北的威脅、風險概況和防制洗錢 / 打擊資恐政策相符。

Preventing terrorists from raising, moving and using funds (Immediate Outcome 10)

防止恐怖份子籌募、移轉及使用資金(直接成果 10)

17. In keeping with its profile, Chinese Taipei has not made any domestic designations pursuant to UNSCR 1373 or made a request or given effect to other countries' requests to take freezing action as appropriate. Chinese Taipei implements TFS without delay, communicating new UN listings to covered entities within one business day of UN listings. MJIB, Financial Supervisory Commission (FSC) and other authorities have undertaken a great deal of outreach and communication on TFS

obligations and provided guidance. Implementation is supported by subsidising FI/DNFBP access to sanctions screening software to small enterprises to comprehensively screen for sanctioned persons and entities. Supervision of TFS implementation (offsite and onsite) has occurred across many sectors. While understanding of TFS is best developed amongst banks and bigger FIs, implementation is occurring amongst smaller entities.

與中華臺北情況一致，目前並沒有根據聯合國安理會第 1373 號決議進行任何國內指定，或者對其他國家要求採取適當的凍結行動的請求予以實施。中華臺北毫不遲延地實施目標性金融制裁（TFS），關於聯合國新的公告名單，中華臺北可在一個工作日內向有關的申報機構公告。法務部調查局，金融監督管理委員會（FSC）和其他主管機關已就目標性金融制裁義務進行了大量的宣導及提供指引。透過補助 FI / DNFBP 小型企業進入制裁名單檢核的資料庫，可支持相關機構實施名單檢核。許多部門都有實施目標性金融制裁並進行監理行動（場外和現地）。雖然銀行和大型金融機構之間對於目標性金融制裁的理解最好，但規模較小的機構也已實施目標性金融制裁。

18. Chinese Taipei has a good understanding of the TF risks associated with NPOs and applies a risk-based approach to mitigating those risks. There have been a number of recent improvements to the legal framework to promote transparency and a significant allocation of resources to support outreach to NPOs. Over the last two years charities regulators, AMLD and other LEAs have engaged regularly with the NPO sectors on CFT issues and have conducted extensive outreach and issued useful guidance. A graded range of risk mitigation obligations, guidance and supervision has been applied taking into account the relative risks of particular sub-sectors and the features and activities of individual NPOs. The charities regulators are able to support LEAs to investigate NPOs suspected of being abused by terrorist financiers.

中華臺北對與非營利組織相關的資恐風險有很好的理解，並採用以風險為本的方法來降低這些風險。近來法律制度已進行了一些改善以促進非營利組織透明度，並分配大量資源以支持對非營利組織的宣導。在過去兩年中，慈善機構監管機關、調查局洗錢防制處和其他執法機關有定期與非營利組織部門就打擊資恐的問題進行互動，並實施了大量的宣導與發布有用的指引文件。考慮到特定類別非營利組織的相對風險以及各個非營利組織的特色和活動，已實施一系列風險抵減、指導和監督。慈善機構監管機關也有協助執法機關調查涉嫌被資恐濫用的非營利組織。

19. Chinese Taipei also has a sound confiscation regime through which it can apply criminal and measures to deprive terrorists of their assets. Overall, Chinese Taipei's measures are generally consistent with its overall risk profile.

中華臺北有一個完善的沒收制度，透過該制度，可以運用刑事處罰和措施剝奪恐怖分子的資產。總體而言，中華臺北的措施大致上與其整體風險狀況一致。

Preventing persons or entities involved in the proliferation of WMD from moving and using funds (Immediate Outcome 11)

防止參與大規模毀滅性武器擴散之個人或實體轉移及使用資金(直接成果 11)

20. Countering WMD proliferation financing is a strategic priority for Chinese Taipei and it has implemented domestic measures to meet and go beyond the FATF standards, including identifying and designating domestic persons and entities that may be linked to sanctions evasion and implementing TFS against them without delay. TFS designations are effective without delay in Chinese Taipei, entering into force within 24 hours of a designation by the UN. They are communicated on the same day to FI/DNFBP and other stakeholders. Chinese Taipei's use of its domestic designation mechanism to designate certain entities owned or controlled by the principal designee has partly contributed to overcoming the technical compliance gap in the scope of coverage of freezing obligations. Freezing actions have occurred in Chinese Taipei within 6 hours of new UN designations being made pursuant to UNSCR 1718.

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打擊資助大規模毀滅性武器擴散為中華臺北策略的優先事項，在其國內之實施情形已達到並超越 FATF 標準，包括辨識和指定可能與規避制裁有關的國內人員和實體，並毫不遲延對其實施目標性金融制裁。目標性金融制裁指定在中華臺北已毫不遲延地生效，在聯合國指定後 24 小時內即於國內生效。同時在同一天會與金融機構/DNFBP 和其他相關機構進行溝通。中華臺北利用其國內指定機制指定由主要被指定人所擁有或控制的某些實體，可部分有助於克服凍結義務覆蓋範圍內的技術遵循落差。中華臺北根據聯合國安理會第 1718 號決議發布新指定的 6 小時內，即已進行凍結行動。

21. Chinese Taipei has well-developed mechanisms for addressing PF in a co-ordinated fashion at policy and operational levels. MJIB, FSC and other authorities have undertaken a great deal of outreach and communication on TFS obligations and provided guidance. As with IO10, by making comprehensive sanctions screening software (TDCC) available to FIs/DNFBPs at subsidised rates, both large and small FI/DNFBPs have the necessary tools and have been shown to actively screen for possible matches with UN sanctioned persons and entities. Supervision (offsite and onsite) has occurred across FI sectors on TFS implementation (Iran and DPRK sanctions). Regulators' outreach—combined with very active publicity of PF-related TFS—has supported improved understanding by FI/DNFBPs of their obligations. The understanding of obligations appears to be well-developed amongst banks and bigger FIs, and reasonably developed amongst smaller FIs and DNFBPs.

中華臺北在政策和執行層面建立了完善的協調打擊資助武擴的機制。調查局、金管會和其他權責機關就目標性金融制裁義務進行了大量的宣導、溝通並提供指引。與直接成果 10 一樣，提供 FI / DNFBP 關於制裁名單檢核的資料庫 (TDCC)，大型和小型金融機構 / DNFBPs 都有現成的資料庫可以使用，並且已被證明可以主動進行檢核聯合國制裁人員和實體的名單。已對金融機構實施目標性金融制裁措施 (伊朗和北韓制裁) 進行監理 (場外和現地)。監理機關的宣導 - 加上非常積極的宣導與資助武擴相關的目標性金融制裁 - 有助金融機構/DNFBPs 了解其義務。銀行和大型金融機構對其義務的瞭解完善，另較小規模的金融機構和 DNFBPs 對於目標性金融制裁義務的瞭解也有合理發展。

22. Chinese Taipei demonstrated 81 PF-related freezing actions with the equivalent of over USD 3.96 million frozen. These frozen assets are associated with two designated persons and six designated entities. Chinese Taipei has implemented publicly-known procedures for providing access to funds for basic expenses.

中華臺北已經採取了 81 次與資助武擴相關的凍結行動，並凍結相當於 396 萬美元的金額。這些凍結的資產與 2 個指定人員和 6 個指定實體有關。中華臺北並已實施公開程序，允許使用部分資金作為基本開支。

AML/CFT Preventive Measures (Chapter 5 - IO4; R.9-23)

防制洗錢/打擊資恐防制措施(第 5 章 - 直接成果 4; R.9-23)

23. Chinese Taipei has a large financial sector and moderately-sized DNFBP sectors. The level and types of ML/TF risks affecting individual FIs and DNFBPs vary, as do the ML/TF risks facing particular sectors. All of the entities performing activities covered by the FATF Standards (except casinos, which are illegal in the jurisdiction) are required to apply a range of risk-based AML/CFT preventive measures, which are generally consistent across all sectors.

中華臺北擁有龐大的金融業和中等規模的 DNFBP 產業。影響個別金融機構和 DNFBPs 的洗錢 / 資恐風險的等級和類型各不相同，特定部門面臨的洗錢 / 資恐風險也各不相同。(除了賭場在司法管轄區內是非法的外)，所有執行 FATF 標準所涵蓋活動的實體都必須採用一系列以風險為本的防制洗錢/打擊資恐防制措施，這些措施在所有產業部門基本上是一致的。

24. AML/CFT compliance is not consistent across different categories of FI. While the numbers and quality of STRs has recently improved, there are concerns about the low level of STR reporting in many sectors, including some identified as being at high-risk, and challenges with the quality of STRs being filed. The banking sector plays a predominant role in the Chinese Taipei financial system, including nearly all of the formal remittance. Overall, the understanding of ML/TF risks and obligations and implementation of AML/CFT measures appears most developed among the banks which demonstrated awareness of their AML/CFT risks in line with many aspects of the NRA. Other large FIs (insurance providers, investment firms and wealth managers) display a reasonable understanding of risks and AML/CFT compliance requirements in their sectors; however, both banks and NBFIs, particularly smaller firms, have a mixed understanding of risk. The understanding of ML/TF risk is much less developed among DNFBPs as the requirement for these entities to undertake a written risk assessment is very recent. A number of obligations on DNFBPs are very new or recently improved.

在不同類別的金融機構中，防制洗錢 / 打擊資恐遵循情形並不一致。儘管可疑交易報告的數量和質量最近有所改善，但仍擔憂許多部門的可疑交易報告水準較低，包括一些被確定為高風險的部門，以及提交可疑交易報告品質的挑戰。銀行業在中華臺北金融體系中佔主導地位，包括幾乎所有的正式匯款。總體而言，對洗錢 / 資恐風險和義務的理解以及防制洗錢 / 打擊資恐措施的實施似乎在銀行中發展最好，銀行所展現對防制洗錢 / 打擊資恐風險的認識與 NRA 許多方面吻合。其他大型金融機構（保險公司、投資公司和財富管理機構）對其所在行業的風險和防制洗錢 / 打擊資恐法遵要求有合理的理解；然而，銀行和非銀行金融機構，特別是規模較小的公司，對風險的理解比較混雜。由於 DNFBPs 是近期才要求進行書面風險評估，因此 DNFBPs 對洗錢 / 資恐風險的理解相對發展較少。對 DNFBPs 的一些義務規範是非常新的或是最近才改善的。

25. Implementation of AML/CFT measures is reasonable across FIs and has recently been enhanced amongst most DNFBPs. Over the last 1-2 years authorities and sectoral association have greatly increased their support to FI and DNFBP sectors to promote implementation, which has seen improvements in the application of many preventive measures. Since early 2018 when the NRA was issued and regulations were updated, implementation has increasingly been risk-based across a wider range of FIs and DNFBP sectors.

各金融機構有合理實施防制洗錢 / 打擊資恐措施，最近在大多數的 DNFBPs 也有所加強。在過去的 1-2 年裡，主管機關和各產業公(協)會大大增加了對金融機構和 DNFBP 的支持，以促進改善許多防制措施的應用。自 2018 年初頒布 NRA 並更新法規以來，金融機構和 DNFBP 產業實施越來越多以風險為本的防制措施。

AML/CFT fit and proper controls and AML/CFT supervision (Chapter 6 - IO3; R.26-28, R. 34-35)

防制洗錢/打擊資恐適格性控制及防制洗錢/打擊資恐監理(第 6 章 - 直接成果 3; R.26-28, R. 34-35)

26. All of the relevant FI and DNFBP sectors covered under the FATF Standards are supervised for AML/CFT compliance. Casinos are illegal and trust and company service providers are not present in the jurisdiction as a separate sector. Generally, there are systems in place for background checks and on fitness and propriety of persons owning or controlling regulated entities, however there are weaknesses across the board with checking for associations with criminals.

所有在 FATF 標準下的金融機構和 DNFBP 產業均已受到防制洗錢 / 打擊資恐的監理，賭場是非法的，而信託及公司服務提供者在司法管轄區內並非為一單獨部門。一般來說，已有系統可以進行背景調查，並檢查擁有或控制受監理實體的人員之適格性，然而各部門對罪犯關係人的檢查存在弱點。

27. FSC has a reasonable understanding of ML/TF risks, which is in line with the NRA. Their sectoral risk understanding is reasonable, but there are some challenges with their ability to develop

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an updated picture of sectoral risks and firm-specific risk level reflecting a need for a wider range of inputs from LEAs and the FIU.

金管會對 ML/TF 風險有合理的理解，並與 NRA 結果一致。他們對產業風險的理解是合理的，但是他們對更新產業部門的風險圖像以及特定公司的風險程度存在一些挑戰，這反映出需要執法機關和金融情報中心提供更廣泛的投入。

28. The frequency scope and intensity of FSC's offsite and onsite supervision is increasingly based on the identified risks. Greater inputs from LEAs and the FIU are needed to guide risk-based supervisory choices, particularly in relation to higher risk scenarios. Other supervisors are still developing their supervisory capacity.

金管會場外和現地檢查的頻率範圍和強度越來越多地基於已識別的風險。特別是在高風險情境方面，需要執法機關和金融情報中心提供更多的投入來引導以風險為本的監理選擇。其他監理機關仍在發展其監理能力。

29. The quality of FSC's supervision appears to be relatively high. FSC has experienced supervisors who demonstrated good AML/CFT skills. The sanctions imposed on banks, securities, and insurance for AML/CFT breaches are relatively low and may not be wholly effective or proportionate. More broadly than the level of fines, the overall effects of remedial measures, enforcement actions and reputation damage appear to be significantly influencing compliance in a positive way.

金管會的監理品質相對較高。金管會具有良好的防制洗錢 / 打擊資恐技能和經驗豐富的監理人員。針對防制洗錢/打擊資恐違規行為的銀行、證券和保險的制裁相對較低，可能並非完全有效或相稱。補救措施、強制行動和聲譽損害的整體效果，顯示比罰款程度影響更廣泛，並能以積極的方式顯著影響法令遵循程度。

30. Chinese Taipei authorities have undertaken a very large number of programs to promote a clear understanding of ML/TF risks and AML/CFT obligations in the recent years. This has included close cooperation between supervisors, sectoral associations, the FIU and LEAs.

近年來，中華臺北權責機關開展了大量計畫以促進對 ML / TF 風險和防制洗錢 / 打擊資恐義務的清晰理解。這包括監理機關，公會，金融情報中心和執法機關之間的密切合作。

Transparency of Legal Persons and Arrangements (Chapter 7 - IO5; R. 24-25)

法人及法律協議透明度(第 7 章- 直接成果 5; R.24-25)

31. A number of reforms to the company law were taken in 2018 to improve governance and transparency of legal ownership and control and governance of legal persons and to improve mechanisms to assist competent authorities to lift the corporate veil. Chinese Taipei acknowledges risks posed by corporate structures and, to a lesser extent, trusts and is taking some steps to mitigate these risks. Details of nominee directors and shareholders are publicly available on the registry. Bearer share warrants have been abolished since mid-2018, and some of the risks from bearer shares have been mitigated. There are limited transparency obligations on private express trusts, and competent authorities do not display a good understanding of risks they may pose and measures to identify and apply transparency controls of such legal arrangements.

中華臺北在 2018 年對公司法進行了一系列改革，改善法人所有權和控制權的治理和透明度，並改進相關機制以協助主管機關揭開公司面紗。中華臺北承認公司結構所帶來的風險，並在較小程度上承認信託風險，並正在採取一些措施來減輕這些風險。代名人董事和股東的詳細資訊在登記處是公開的。自 2018 年中起，無記名股票被廢除，無記名股票的部分風險得到減輕。對於民事信託透明度的規範有限，主管機關並未充分了解其可能帶來的風險以及確定對此類法律協議透明度的控制措施。

32. Chinese Taipei has recently improved the regulatory framework for all FIs and DNFBPs to obtain and maintain beneficial ownership, but there is still some way to go before all reporting entities are complying with these requirements. The context of Chinese Taipei sees relatively little professional intermediation in the establishment or continuing operation of legal persons, so FIs/DNFBPs may not consistently hold up to date and accurate information on beneficial ownership. LEAs can access any available beneficial ownership information collected by FIs and DNFBP through CDD in a timely fashion.

中華臺北最近改善了對於所有金融機構和 DNFBPs 的監理框架，以取得並持有實質受益權，但在所有申報機關都遵守這些要求之前還有一段路要走。中華臺北的概況是較少有專業中介機構在提供法人設立以及維持公司營運之服務，因此金融機構/DNFBPs 可能無法持續的掌握有關實質受益權之最新和正確資訊。執法機關可以及時向金融機構和 DNFBP 取得透過客戶盡職調查得到的實質受益權資訊。

33. Authorities demonstrated regular use of a combination of investigative techniques, basic information and CDD data obtained from FI/DNFBPs to identify beneficial ownership and control of corporate structures. This has included international cooperation in sharing such information.

主管機關證實定期使用調查技術及透過金融機構/DNFBPs 所取得之基本資訊和客戶盡職調查資料，以辨識出實質受益權和公司結構控制權。這包括分享此類資訊的國際合作。

International Cooperation (Chapter 8 - IO2; R. 36-40)

國際合作(第 8 章 - 直接成果 2; R.36-40)

34. In general, Chinese Taipei provides good quality, constructive and timely assistance for international cooperation requests related to ML, predicates and asset restraint and forfeiture. The assistance provided and sought by Chinese Taipei has included formal mutual legal assistance (MLA) as well as sharing financial intelligence, supervisory information, exchanges between LEAs and other forms of international cooperation. Chinese Taipei has made three outgoing extradition requests. Repatriation and deportation of wanted individuals has been achieved between Chinese Taipei and China under the Cross-Strait Joint-Fight against Crime and Mutual Legal Assistance Agreement (2009).

一般而言，中華臺北為有關洗錢、前置犯罪、資產限制和沒收的國際合作請求提供優質、建設性和及時的協助。中華臺北提供和尋求的援助包括正式的司法互助，分享金融情報、監理資訊、執法機關間的訊息交換和其他形式的國際合作。中華臺北已經提出三次引渡請求。根據兩岸共同打擊犯罪和司法互助協議（2009 年），中華臺北與中國大陸之間的通緝犯已被遣返和驅逐出境。

35. The efforts of LEAs in actively seeking international cooperation has resulted in perpetrators being prosecuted and convicted, along with criminal asset seizure outside of Chinese Taipei. Chinese Taipei seeks assistance in an appropriate and timely manner to pursue domestic predicates, however, it has not demonstrated sufficient proactive pursuit of international assistance on ML violations.

EXECUTIVE SUMMARY



執法機關積極尋求國際合作的努力使犯罪者在中華臺北以外的地方被起訴和定罪，以及扣押資產。中華臺北以適當和及時的方式尋求援助以追查國內前置犯罪，但是它未能針對洗錢行為積極尋求國際援助。

36. Chinese Taipei routinely uses other forms of international cooperation in a proper and timely manner and works hard to overcome the long-standing challenges it faces to ensure productive international cooperation. Chinese Taipei maintains a global network of LEA, MJIB and Customs representatives overseas who coordinate international cooperation on behalf of Chinese Taipei and have been able to assist and obtain assistance from foreign counterparts in a dynamic manner. Chinese Taipei shares basic and, as it can be identified, beneficial ownership information.

中華臺北例行、適當而及時地運用其他形式的國際合作，並努力克服長期面臨的挑戰，以確保國際合作的卓越成效。中華臺北在海外擁有由執法機關、調查局和海關代表組成的全球網絡，他們代表中華臺北協調國際合作，並能夠以機動的方式幫助和獲得外國對應單位的幫助。中華臺北共享基本的及（如可以識別的）實質受益權資訊。

Priority Actions

優先行動

37. The prioritised actions that Chinese Taipei should take include:

中華臺北應採取的優先行動包括：

a) Amend the CTF Act to address TC gaps in relation to TFS and the minor gaps in relation to TF.

修訂“資恐防制法”，以解決在目標性金融制裁的技術遵循落差，與資恐方面的較輕微落差。

b) Increase the human resources available to the AMLD to ensure that financial intelligence is fully exploited and that it is able to continue to service the demands it faces in relation to outreach, information sharing, risk assessments, TFS coordination, etc.

增加調查局洗錢防制處的人力，以確保充分利用金融情報，並能夠繼續滿足其在宣導、資訊分享、風險評估、協調目標性金融制裁等方面所面臨的需求。

c) Institutionalise the strong coordination structure that was put in place ahead of the ME (the AMLO) to support ongoing priority actions to mitigate ML/TF/PF risk.

在相互評鑑之前所建立強而有力的協調架構(行政院洗錢防制辦公室)應予制度化，以支持正在進行的優先行動，減輕洗錢/資恐/武擴風險。

d) Prioritise further comprehensive assessments of risk including: cash economy issues (including scope of the cash economy; cross-border movement of cash); ML risks with underground banking; foreign legal persons and arrangements in Chinese Taipei's offshore sector; organised crime involvement in third-party ML; emerging TF issues (including global trends on terrorism and TF). Pursue international cooperation to obtain inputs on such assessments.

優先進一步全面評估的風險包括：現金經濟的議題(包括現金經濟的範圍及跨境現金移動); 地下通匯的洗錢風險; 在中華臺北離岸部門的外國法人和法律協議的風險; 涉及第三方洗錢的組織犯罪; 新興資恐議題(包括恐怖主義及資恐的全球趨勢)。應透過國際合作以取得相關資源投入評估工作。

- e) Further integrate interaction between AMLD analysts and MJIB and police at the stage of targeting high risk crime types, e.g. drug trafficking, smuggling and third-party ML networks.

在鎖定高風險犯罪類型（例如販毒，走私和第三方洗錢網絡）目標的階段，進一步整合洗錢防制處分析人員、法務部調查局和警方之間的交流互動。

- f) LEAs should increase the use of the ML offence including through enhancement of the quality of briefs of evidence, consideration of ML at an early stage of predicate investigations, and prioritisation of third party ML across a wider range of offences.

執法機關應增加運用洗錢犯罪，包括通過提高證據摘要的品質，在前置犯罪調查的早期階段即將洗錢納入考慮，以及在更廣泛的犯罪行為中優先考慮第三方洗錢。

- g) Consider introducing AEA into asset management at the asset seizure stage or earlier, thereby relieving prosecutor's workload and effectively using AEA's expertise to manage proceeds of crime assets to preserve their value for forfeiture.

考慮在資產扣押階段或更早即將行政執行署引入資產管理，從而減輕檢察官的工作量，並有效利用行政執行署的專業知識來管理資產以保存其沒收的價值。

- h) Prioritise deeper implementation of ML risk management, in particular CDD, over higher risk sub-sectors among banks. Enhance liaison and engagement between supervisors and LEAs with the private sector, including industry associations and other sectoral groups. In particular, improved and more frequent inputs from LEAs on ML/TF/PF risks posed to FIs and DNFBPs subject to higher threats and vulnerabilities. Provide further risk-based guidance on beneficial ownership, taking into consideration Chinese Taipei's FI and DNFBP sectoral vulnerabilities.

優先考慮在銀行間具有更高風險的子部門中，實施更深入的洗錢風險管理，特別是客戶盡職調查措施。加強監理機關和執法機構與私部門間，包括各產業公(協)會和其他部門團體之間的聯絡和接觸。特別是對於 ML / TF / PF 風險，將來自執法機關所提供更佳及更頻繁資訊，轉知面臨更高威脅和弱點的 FI 及 DNFBP。並在考量中華臺北金融機構和 DNFBP 產業弱點的前提下，進一步提供有關實質受益權以風險為本的指引。

- i) Supervisors (especially for DNFBPs) should increase capacity with regards to the number of specialist AML supervisory staff, supervisory tools, and training for risk-based supervision.

監理機關（尤其是 DNFBPs）應針對以風險為本的監理，增加專業防制洗錢監理人員、監理工具和培訓。

- j) FSC and LEAs should implement further measures to support information exchange on risk. The obligations on market entry fit and proper should be expanded and further implemented. This should include enhanced information sharing between agencies, including continuing international cooperation between supervisors.

金管會和執法機關應實施進一步措施，以支持風險資訊的交換。擴大並進一步實施市場准入之適格性義務。這應包括加強各機關之間的資訊共享，包括持續監理機構間的國際合作。

EXECUTIVE SUMMARY



Effectiveness & Technical Compliance Ratings

效能及技術遵循評等

Effectiveness Ratings

效能評等

IO.1 - Risk, policy and coordination IO.1 - 風險、政策與協調	IO.2 - International cooperation IO.2 - 國際合作	IO.3 - Supervision IO.3 - 監理	IO.4 - Preventive measures IO.4 - 防制措施	IO.5 - Legal persons and arrangements IO.5 - 法人及法律協議	IO.6 - Financial intelligence IO.6 - 金融情報
Substantial 相當有效	Substantial 相當有效	Moderate 中度有效	Moderate 中度有效	Moderate 中度有效	Substantial 相當有效
IO.7 - ML investigation & prosecution IO.7 - 洗錢犯罪調查與起訴	IO.8 - Confiscation IO.8 - 沒收	IO.9 - TF investigation & prosecution IO.9 - 資恐犯罪調查與起訴	IO.10 - TF preventive measures & financial sanctions IO.10 - 資恐防制措施與金融制裁	IO.11 - PF financial sanctions IO.11 - 武擴金融制裁	
Moderate 中度有效	Substantial 相當有效	Substantial 相當有效	Substantial 相當有效	Substantial 相當有效	

Technical Compliance Ratings (C – compliant, LC – largely compliant, PC – partially compliant, NC – non compliant)

技術遵循評等 (C – 遵循，LC – 大部分遵循，PC – 部分遵循，NC – 未遵循)

EXECUTIVE SUMMARY

<p>R.1 - Assessing risk & applying risk-based approach 評估風險與應用以風險為本之方法</p>	<p>R.2 - National cooperation and coordination 全國性合作及協調機制</p>	<p>R.3 - Money laundering offence 洗錢犯罪</p>	<p>R.4 - Confiscation & provisional measures 沒收及暫時性措施</p>	<p>R.5 - Terrorist financing offence 資助恐怖分子犯罪</p>	<p>R.6 - Targeted financial sanctions – terrorism & terrorist financing 資助恐怖分子及恐怖主義之目標性金融制裁</p>
<p>LC 大部分遵循</p>	<p>LC 大部分遵循</p>	<p>LC 大部分遵循</p>	<p>LC 大部分遵循</p>	<p>LC 大部分遵循</p>	<p>LC 大部分遵循</p>
<p>R.7 - Targeted financial sanctions – proliferation 武器擴散之目標性金融制裁</p>	<p>R.8 - Non-profit organisations 非營利組織</p>	<p>R.9 - Financial institution secrecy laws 金融機構保密法律</p>	<p>R.10 - Customer due diligence 客戶審查</p>	<p>R.11 - Record keeping 紀錄保存</p>	<p>R.12 - Politically exposed persons 擔任重要政治職務人士</p>
<p>LC 大部分遵循</p>	<p>LC 大部分遵循</p>	<p>C 遵循</p>	<p>LC 大部分遵循</p>	<p>LC 大部分遵循</p>	<p>C 遵循</p>
<p>R.13 - Correspondent banking 通匯銀行業務</p>	<p>R.14 - Money or value transfer services 金錢或價值移轉服務</p>	<p>R.15 - New technologies 新科技運用</p>	<p>R.16 - Wire transfers 電匯</p>	<p>R.17 - Reliance on third parties 依賴第三方之防制措施</p>	<p>R.18 - Internal controls and foreign branches and subsidiaries 內控及國外分支機構和子公司</p>
<p>C 遵循</p>	<p>C 遵循</p>	<p>C 遵循</p>	<p>C 遵循</p>	<p>C 遵循</p>	<p>LC 大部分遵循</p>
<p>R.19 - Higher-risk countries 高風險國家</p>	<p>R.20 - Reporting of suspicious transactions 申報可疑交易</p>	<p>R.21 - Tipping-off and confidentiality 揭露與保密</p>	<p>R.22 - DNFBPs: Customer due diligence 特定非金融專業人員：客戶審查</p>	<p>R.23 - DNFBPs: Other measures 特定非金融專業人員：其他措施</p>	<p>R.24 - Transparency & BO of legal persons 法人之透明度及實質受益權</p>
<p>C 遵循</p>	<p>LC 大部分遵循</p>	<p>LC 大部分遵循</p>	<p>PC 部分遵循</p>	<p>LC 大部分遵循</p>	<p>LC 大部分遵循</p>
<p>R.25 - Transparency & BO of legal arrangements 法律協議之透明度及實質受益權</p>	<p>R.26 - Regulation and supervision of financial institutions 金融機構之規範與監理</p>	<p>R.27 - Powers of supervision 監理機關之權力</p>	<p>R.28 - Regulation and supervision of DNFBPs 特定非金融專業人員之規範與監理</p>	<p>R.29 - Financial intelligence units 金融情報中心</p>	<p>R.30 - Responsibilities of law enforcement and investigative authorities 執法和調查機關之責任</p>
<p>PC 部分遵循</p>	<p>LC 大部分遵循</p>	<p>LC 大部分遵循</p>	<p>PC 部分遵循</p>	<p>LC 大部分遵循</p>	<p>C 遵循</p>
<p>R.31 - Powers of law enforcement and investigative authorities 執法和調查機關之權力</p>	<p>R.32 - Cash couriers 攜帶現金</p>	<p>R.33 - Statistics 統計數據</p>	<p>R.34 - Guidance and feedback 指引與回饋</p>	<p>R.35 - Sanctions 處罰</p>	<p>R.36 - International instruments 國際相關公約與規範</p>

EXECUTIVE SUMMARY



LC 大部分遵循	LC 大部分遵循	LC 大部分遵循	C 遵循	PC 部分遵循	LC 大部分遵循
R.37 - Mutual legal assistance 司法互助	R.38 - Mutual legal assistance: freezing and confiscation 司法互助-凍結和沒收	R.39 - Extradition 引渡	R.40 - Other forms of international cooperation 其他形式合作		
LC 大部分遵循	LC 大部分遵循	LC 大部分遵循	LC 大部分遵循		