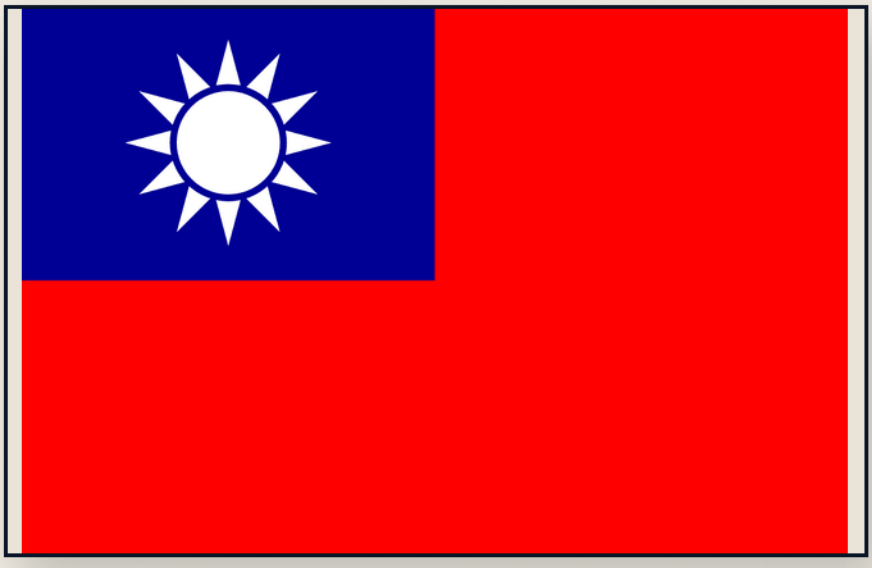
VOVE ID

VOVE COUNTRY CONTROL FILE

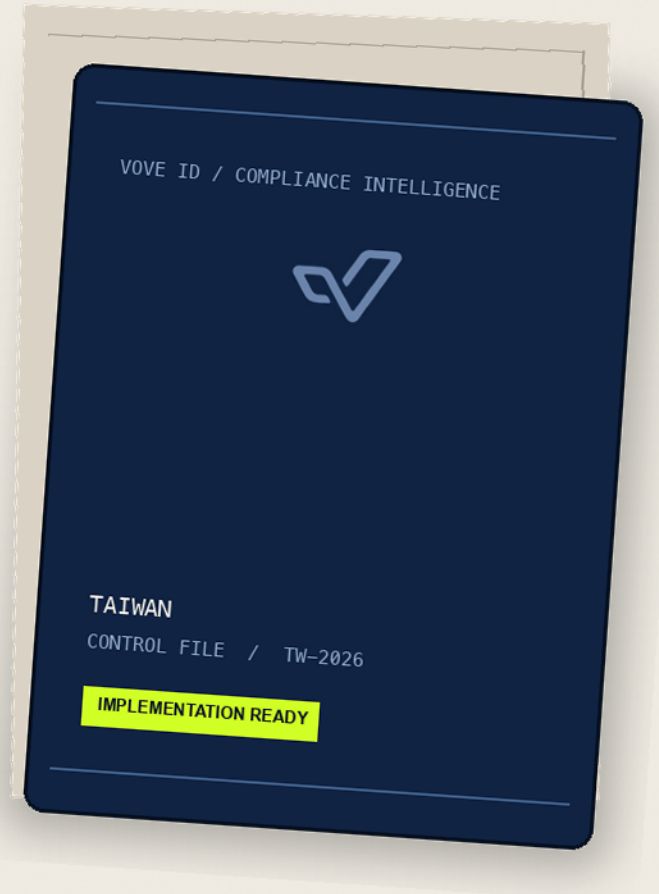
KYC / KYB / AML

2026 EDITION

TAIWAN



TAIWAN / TW



KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE

READ THIS FIRST

Taiwan KYC, KYB & AML Compliance Checklist

Implementation checklist for Taiwan customer due diligence, beneficial ownership, transaction reporting, sanctions, privacy, payments, virtual assets and remote onboarding controls.

Primary AML law	**Money Laundering Control Act**
FIU	**Anti-Money Laundering Division, Investigation Bureau, Ministry of Justice**
Financial-sector STR	**Within 10 business days after discovery; urgent significant cases as soon as possible**
Cash reporting amount	**NT$500,000 or foreign-currency equivalent, subject to prescribed exemptions**
Cross-border wire CDD	**NT$30,000 or foreign-currency equivalent**
AML beneficial owner	**Natural person with more than 25% ownership, then other control, then senior manager fallback**
Records	**At least 5 years; longer where another law requires**
FATF public lists	**Not listed at 19 June 2026**

Scope and legal framework

The Money Laundering Control Act, Counter-Terrorism Financing Act, sector AML/CFT regulations and supervisory rules form the core framework. Obligations vary across financial institutions, virtual asset service providers and designated non-financial businesses and professions.

FATF context

Chinese Taipei is an Asia/Pacific Group on Money Laundering member and was absent from the FATF increased-monitoring and call-for-action lists dated 19 June 2026. Absence from a FATF public list is not a low-risk classification.

IMPORTANT

General information, not legal advice. Reviewed 5 November 2026. Confirm controlling Chinese texts, commencement status, sector rules, reporting formats, exemptions, sanctions designations, privacy requirements and licensing conditions with the competent authority and qualified Taiwan counsel.

HOW TO USE THIS GUIDE

Turn each requirement into owned evidence

For every row, assign an owner, confirm whether the control applies, link the evidence, record gaps, and set a remediation date. A checked box is not evidence by itself.

01 / SCOPE	02 / DESIGN	03 / EVIDENCE	04 / REVIEW
Confirm institution, supervisor, product, customer and risk scope.	Map each obligation to a policy, system control or human review.	Retain the document, decision, timestamp, owner and rationale.	Test the control and update it when rules or risks change.

Checklist legend

CONTROL tells you what outcome to cover. IMPLEMENTATION ACTION translates that outcome into operational work. EVIDENCE suggests what an auditor or reviewer should be able to inspect. SOURCE points back to the primary rule or regulator guidance.

Minimum review record

Keep a compact decision record for each checklist row so a later reviewer can reconstruct what applied, who decided, and what evidence was inspected.

APPLICABILITY	OWNERSHIP	TRACEABILITY
Applicable, not applicable, or pending legal confirmation, with a short rationale.	Named control owner, reviewer, approval date and next review date.	Evidence link, source version, test result, gap status and remediation ticket.

1. SCOPE, AUTHORITIES, AND LICENSING

Scope, authorities, and licensing

Classify the activity and competent supervisor before launch.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Determine whether the business is a financial institution, VASP, third-party payment provider or DNFBP.	Map each service and Taiwan nexus to the Money Laundering Control Act and the current sector regulation; do not apply financial-institution thresholds to another sector without confirmation.	Perimeter memo, service map and legal-source register.	Money Laundering Control Act, Articles 5-6
Obtain each required registration, licence or approval.	Confirm FSC, Ministry of Digital Affairs, Ministry of Economic Affairs or other competent-authority requirements before operating regulated financial, payment, remittance, virtual-asset or DNFBP services.	Licence matrix, approvals and conditions.	Money Laundering Control Act, Article 6; applicable sector legislation
Use the correct reporting and supervisory authority.	Maintain a dated map of the FSC and sector supervisors, and route statutory reports to the Investigation Bureau in the prescribed format.	Authority map, portal procedure and acknowledgements.	Money Laundering Control Act; sector AML/CFT regulations

2. GOVERNANCE AND RISK ASSESSMENT

Governance and risk assessment

Controls must be risk-based, documented and tested.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain an enterprise ML/TF/PF risk assessment.	Assess customers, geography, products, delivery channels, transactions, technologies and sanctions exposure, using current national and sector risk material.	Methodology, assessment, approval and update log.	Money Laundering Control Act, Article 7; FSC AML Regulations, Article 4
Maintain AML/CFT internal controls and audit.	Assign accountable leadership and compliance personnel, document procedures, train staff and conduct proportionate independent testing.	Governance map, policies, training and audit reports.	Money Laundering Control Act, Article 7
Apply group-wide controls lawfully.	Document overseas implementation, information sharing and conflict-of-law escalation without weakening Taiwan duties or personal-data protections.	Group standard, jurisdiction analysis and escalation log.	FSC AML Regulations, Article 4; Personal Data Protection Act

3. NATURAL-PERSON IDENTIFICATION

Natural-person identification

CDD triggers and methods are sector-specific.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Identify and verify customers before establishing a relationship.	Use reliable, independent documents, data or information; retain the identity evidence or prescribed record.	Identity record, verification result and provenance.	FSC AML Regulations, Article 3
Apply financial-sector occasional-transaction triggers.	For covered financial institutions, perform CDD for cash transactions of NT$500,000 or more, linked transactions meeting that amount, and cross-border wires of NT$30,000 or more; confirm sector-specific variations.	Threshold table, configuration and test cases.	FSC AML Regulations, Articles 2-3
Verify representatives and authority.	Confirm the agency, identify and verify the representative, and retain authority evidence before accepting instructions.	Representative KYC, mandate and validation.	FSC AML Regulations, Article 3(4)(2)
Respond to failed or doubtful CDD.	Do not proceed contrary to the applicable rule; restrict activity, document the reason and consider an STR without tipping off.	Exception record, restriction and STR assessment.	FSC AML Regulations, Article 3(9)-(11)

KYB, company information, and beneficial ownership

Verify existence, authority, ownership and ultimate control.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Verify the legal person or arrangement.	Obtain name, legal form, existence, governing documents, registered office, principal place of business and senior management information from reliable sources.	Company extract, constitutional documents and validation log.	FSC AML Regulations, Article 3(5)
Identify and verify beneficial owners.	Identify natural persons owning directly or indirectly more than 25%; if none or doubtful, identify control by other means; if none, identify the senior managing official.	Ownership chart, control rationale and verified identities.	FSC AML Regulations, Article 3(7)
Apply trust and similar-arrangement tests.	Identify the settlor, trustee, trust supervisor, beneficiaries and any other natural person exercising ultimate effective control, or equivalent roles.	Trust deed, role map and verified identities.	FSC AML Regulations, Article 3(7)(2)
Reconcile CDD with company reporting information.	Use the official company-information sources and investigate inconsistencies; do not treat registry information as a substitute for risk-based verification.	Registry extract, comparison and discrepancy resolution.	Company Act; Regulations Governing Company Registration

5. PEPS, EDD, AND REMOTE ONBOARDING

PEPs, EDD, and remote onboarding

Higher-risk relationships require enhanced controls.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Identify foreign, domestic and international-organisation PEP exposure.	Screen customers and beneficial owners and apply the current risk classification, senior approval, source-of-wealth, source-of-funds and monitoring requirements.	Screening, classification, approval and corroboration.	FSC AML Regulations, Articles 6 and 10
Apply EDD to higher-risk relationships.	Obtain additional identity, purpose, ownership, wealth and funds evidence; increase approval and monitoring in proportion to risk.	EDD checklist, evidence and approval.	FSC AML Regulations, Article 6
Control non-face-to-face onboarding.	Use a method permitted by the relevant supervisor, test impersonation and fraud controls, and retain authentication and exception evidence.	Method assessment, session evidence and test results.	Applicable FSC and sector remote-onboarding rules

Monitoring and suspicious reporting

Monitoring must support timely reporting to the Investigation Bureau.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Monitor accounts and transactions on a risk basis.	Use documented scenarios, parameters, alert review and periodic tuning informed by the business risk assessment and published typologies.	Scenario inventory, alerts, tuning and governance.	FSC AML Regulations, Article 9
Report suspicious ML/TF activity regardless of amount or completion.	For covered financial institutions, file the prescribed STR with the Investigation Bureau within 10 business days after discovery and report obviously significant urgent cases as soon as possible through the permitted urgent route.	Trigger analysis, discovery time, approval, filing and acknowledgement.	FSC AML Regulations, Article 15
Prevent tipping off and protect report information.	Restrict access and communications and disclose only when legally permitted.	Access log, communication controls and training.	Money Laundering Control Act and applicable reporting rules
Document non-filing decisions.	Preserve facts, analysis, reviewer and decision time for alerts closed without an STR.	Closed-alert rationale and quality review.	FSC AML Regulations, Articles 9 and 15

7. CASH REPORTS, WIRES, PAYMENTS, AND VIRTUAL ASSETS

Cash reports, wires, payments, and virtual assets

Separate CDD triggers, cash reporting and licensing duties.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
File covered cash transaction reports.	For covered financial institutions, report cash transactions of NT$500,000 or more to the Investigation Bureau electronically within five business days, unless a prescribed exemption applies; still identify the customer and retain records where required.	Threshold result, exemption rationale, report and receipt.	FSC AML Regulations, Articles 2 and 13-14
Carry and screen required wire-transfer information.	Apply the current originator, beneficiary, missing-data, sanctions and intermediary controls for domestic and cross-border transfers.	Field matrix, samples, screening and repair queue.	FSC AML Regulations, Article 7
Classify payment and remittance models before launch.	Map wallets, stored value, acquiring, transfer, remittance and third-party payment functions to current registration and AML requirements.	Product memo, registration and control tests.	Money Laundering Control Act, Article 6; applicable payment laws
Register and control covered virtual-asset services.	Determine whether exchange, transfer, custody, wallet or related activity is a covered VASP function and complete the current AML registration before operating.	Classification, registration and AML programme.	Money Laundering Control Act, Article 6; VASP AML/CFT Regulations

8. TARGETED FINANCIAL SANCTIONS

Targeted financial sanctions

Implement current Taiwan designations and prohibitions.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Screen designated sanctioned persons and entities.	Screen customers, beneficial owners, representatives and transactions at onboarding, periodically and on list updates against the competent authority's current list.	List version, screening logs and match decisions.	Counter-Terrorism Financing Act, Articles 4-5
Freeze and report property without unauthorized dealing.	Apply the statutory restriction immediately to a confirmed designation and report property, interests and location through the prescribed route.	Designation, restriction timestamp and report receipt.	Counter-Terrorism Financing Act, Articles 6-7
Use permits and releases only under written authority.	Document the legal basis, competent-authority approval and every condition before permitting access or releasing restrictions.	Permission, conditions and release record.	Counter-Terrorism Financing Act

9. RECORDS AND AUTHORITY ACCESS

Records and authority access

Records must reconstruct the customer and transaction lifecycle.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Retain transaction records for at least five years.	Preserve domestic and international transaction records for five years or longer where another law requires.	Retention schedule, trigger and retrieval test.	FSC AML Regulations, Article 12(1)
Retain CDD and relationship records for at least five years.	Run the period from relationship end or occasional-transaction date and retain identity, account, contract, correspondence and analysis records.	Schedule, source records and deletion controls.	FSC AML Regulations, Article 12(2)
Make records swiftly available to competent authorities.	Maintain controlled, auditable retrieval and production procedures.	Access matrix, production log and integrity checks.	FSC AML Regulations, Article 12(4)

10. PRIVACY, BIOMETRICS, BREACHES, AND TRANSFERS

Privacy, biometrics, breaches, and transfers

Apply the operative Personal Data Protection Act text and sector rules.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Use a lawful, necessary and proportionate basis for personal data.	Map collection, processing, use, notices, rights, retention and processors to the operative statutory provisions and specified purpose.	Data map, notices, legal-basis register and rights log.	Personal Data Protection Act, Articles 5, 8-9 and 19-20
Protect identity and biometric data.	Minimise collection, apply security proportionate to sensitivity and document necessity, accuracy, access, liveness and deletion controls.	Assessment, security design, test results and approvals.	Personal Data Protection Act, Articles 2, 5 and 27; operative sector rules
Apply the operative breach-notification rule.	Confirm whether the 2025 amendments and sector rules are in force on the incident date; notify affected persons and authorities within the applicable scope and timing rather than assuming an uncommenced provision applies.	Commencement check, incident chronology, risk assessment and notices.	Personal Data Protection Act, Article 12 and commencement notes
Control international transfers.	Check competent-authority restrictions, purpose compatibility, contracts and security before transferring personal data abroad.	Transfer map, restriction check, safeguards and notices.	Personal Data Protection Act, Article 21

11. PRACTICAL EVIDENCE PACKS

Practical evidence packs

Evidence must reconstruct decisions end to end.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain an onboarding pack.	Bundle identity, authority, KYB, beneficial ownership, PEP, sanctions, purpose, risk, privacy and approvals.	Complete sample and retrieval result.	Operational control supporting FSC AML Regulations, Articles 3-10
Maintain STR, cash-report and sanctions case packs.	Link trigger, analysis, decision time, approval, filing, receipt, confidentiality and restrictions.	Case pack, timeline and access record.	FSC AML Regulations, Articles 13-15; Counter-Terrorism Financing Act
Maintain a launch and legal-change pack.	Record perimeter, licences, thresholds, reporting, sanctions, privacy, vendors, source versions and tests.	Signed pack, source register and approvals.	Official sources listed below

SOURCES AND FURTHER READING

Verify against current official material

Primary law and regulator guidance control. Contextual VOVE ID reading is included to help teams operationalize the requirements and is not legal authority.

Money Laundering Control Act
Financial Supervisory Commission laws system · Primary legislation - official text
Open official source

Regulations Governing Anti-Money Laundering of Financial Institutions
Financial Supervisory Commission · Official sector regulation
Open official source

FSC laws and regulations retrieving system
Financial Supervisory Commission · Official regulatory repository
Open official source

Counter-Terrorism Financing Act
Financial Supervisory Commission · Primary legislation - official English text
Open official source

VASP AML/CFT Regulations
Financial Supervisory Commission · Official sector regulation
Open official source

Anti-Money Laundering Office
Executive Yuan · Official AML policy and risk portal
Open official source

2024 National ML/TF/PF Risk Assessment - English
Executive Yuan Anti-Money Laundering Office · Official national risk assessment
Open official source

Company Act
Laws and Regulations Database of the Republic of China · Primary legislation - official consolidated text
Open official source

Regulations Governing Company Registration
Ministry of Economic Affairs · Official registry regulation
Open official source

Company responsible person and major shareholder reporting platform guidance
Ministry of Economic Affairs · Official registry guidance
Open official source

Personal Data Protection Act
Laws and Regulations Database of the Republic of China · Primary legislation - official consolidated text and commencement notes
Open official source

National flag specifications and official artwork
Ministry of the Interior · Official flag guidance
Open official source

APG mutual evaluation of Chinese Taipei
Asia/Pacific Group on Money Laundering · Authoritative mutual evaluation
Open official source

FATF increased monitoring - 19 June 2026
FATF · Authoritative current public-list status
Open official source

FATF call for action - 19 June 2026
FATF · Authoritative current public-list status
Open official source

Document control

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