



缅甸尚未饱和的金融市场 对外国银行的吸引力

## The Attractiveness of Myanmar's Unsaturated Financial Markets to Foreign Banks

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鉴于台湾政府推动新南向政策及对于亚太地区的经贸布局，再加上新冠肺炎疫情引发许多企业转移供应链或其投资至东南亚国家，面对东盟及南亚国家在经济成长下产生消费力十足的新兴中产阶级所形成的庞大内需市场商机，有愈来愈多台商及各国企业跃跃欲试，推升企业进驻当地对于金融及银行服务之需求。东盟国家当中的缅甸，无疑是具有吸引力的国家之一。

In view of the Taiwan government's promotion of a new southbound policy and the economic and trade arrangements for the Asia-Pacific region, coupled with the coronavirus pandemic, many companies have relocated their supply chains or invested in Southeast Asian countries. In the face of growing domestic market opportunities created by an emerging consumer-oriented middle class with increased buying power in ASEAN countries, more and more Taiwanese and international companies are eager to invest, boosting the local demand for financial and banking services. Myanmar among ASEAN countries is undoubtedly one of the attractive countries.

## 缅甸金融市场尚未饱和

### Myanmar's Unsaturated Financial Market

缅甸的经济成长在过去三年每年超过6.5%，尽管今年受疫情影响，根据亚洲开发银行4月提出的经济预测，缅甸今年的GDP成长仍可达4.2%，是少数经济维持成长的国家之一。缅甸仍是一个新兴、亟待开拓的市场，其拥有约5,400万的人口，尚有一半以上的人口未能普遍得到适当的银行服务，而过去几年缅甸境内并购活动稳步增长，在当地注册成立公司的规模与范围亦趋扩大，并转而寻求具有丰富经验且专业的外国银行协助其筹资，突显出当地对于金融服务之需求大于供给的状况。

Myanmar's economic growth has exceeded 6.5% annually in the past three years. Although affected by the coronavirus pandemic this year, the Asian Development Bank predicted in April a growth of 4.2% in Myanmar's GDP, making it one of the few countries where the economy has maintained growth. Myanmar remains an emerging market that urgently needs to be developed. With a population of about 54 million, more than half has not been properly provided with appropriate banking services. In the past few years, M&A activities in Myanmar have grown steadily, and the country has seen an increased number of new companies being incorporated. The scale and scope of the banking sector have also expanded, turning to experienced foreign banks for their expertise in fund raising, highlighting the local demand for financial services being greater than the supply.

缅甸政府对于开放银行业已积极加以推动，缅甸央行于2019年1月开放允许外国银行可持有本地银行不超过35%的股权，2020年1月更宣布外国银行得以个案申请获准持股本地银行超过35%的门坎。此外，针对外国银行的审核发照，2014、2016年已完成了第一、二阶段，发出分行及子行执照给多家外国银行，要求外国银行持有分行执照者，其实收资本额须达7,500万美元，仅能从事企金业务，不得从事消金业务；若是子行，则实收资本额须达1亿美元，除企金业务外，开放自2021年1月1日起可从事消金业务。于2019年11月7日缅甸央行更宣布开启三阶段，台湾有四家银行申请，由国泰世华及兆丰银行成功取得分行执照。

The Myanmar government has actively promoted the development of the banking industry. The Central Bank of Myanmar opened in January 2019 to allow foreign banks to hold equity interest in local banks. In January 2020, it was announced that foreign banks were able to apply for approval to hold shares in local banks, capped at 35%. Additionally, first and second stages of foreign bank licenses application review

have been completed in 2014 and 2016 respectively, which resulted in a number of foreign banks receiving branch and sub-branch licenses in Myanmar. The main requirements for foreign banks to obtain branch and sub-branch licenses are to have a minimum capital of 75 million US dollars, only engage in corporate finance business, not to engage in consumer finance business. For a sub-branch, the paid-in capital must be at least 100 million US dollars, and in addition to corporate finance business, sub-branch will be authorised to engage in consumer finance business from January 1, 2021. On November 7, 2019, the Central Bank of Myanmar announced the opening of three phases. Four Taiwanese banks have applied, and Cathay United Bank and Mega Bank successfully obtained branch licenses.

## 取得当地银行执照后的筹备工作

### Preparatory Work After Obtaining Local Banking License

依据缅甸央行的规定，取得分行执照后须于九个月内完成筹备工作，建议从下列事项着手：

According to the regulations of the Central Bank of Myanmar, after obtaining the branch license, some preparatory work must be completed within nine months. It is recommended to start with the following:

- 将银行的表格文件在地化，以符合当地法令；  
Localize the bank's forms and documents to comply with local laws and regulations;
- 建立内部法遵规范，其范围除包括缅甸金融监管机关发布银行相关法令及外国法律，例如《反海外贪腐法》、《英国反贿赂法》，亦须涵盖遵循道德规范、反洗钱、反贿赂贪腐、馈赠及娱乐、隐私与保密、税务及公司法上的一般要求；  
Establish internal compliance regulations, which includes, in addition to the issuance of banking regulations issued by the financial regulatory authorities of Myanmar and foreign laws such as the FCPA, the UK Bribery Act, ethical compliance, anti-money laundering, anti-bribery, corruption, gifts and entertainment, privacy and confidentiality, taxation and company law;
- 与缅甸员工签署劳动合同；  
Enter into employment contracts with Myanmar employees;
- 培训员工，内容应着重在反洗钱、风险评估、了解您的客户（KYC）、可疑活动之监控与报告、以及纪录保存等；  
Provide training to employees on anti-money laundering, risk assessment, understanding your customers (KYC), monitoring and reporting of suspicious activities, record keeping, etc.;
- 承租营业场所并签署租约；  
Enter into a lease agreement for the place of business;
- 向税务机关办理注册，并于开始营业30日前完成商业税(commercial tax)的首次登记，于每会计年度结束30日前办理续签；  
Register with the tax authorities, complete the first registration of commercial tax 30 days before the start of business, and apply for renewal 30 days before the end of each fiscal year;
- 开始营业后30日内向主管机关办理员工登记，并依法为社会安全基金进行每月提拨（雇主提拨3%，员工自提2%）；

Apply to the competent authority for employee registration within 30 days after commencement of business, and make monthly payment for social security fund as stated in Myanmar labour law (3% for employer, 2% for employee);

- 协助外国员工取得商务签证（效期为70日），对于长期留在缅甸工作者，则须申请较长居留期限和多次入境的签证，如居住与工作期间连续天数超过90日，尚应取得外国人注册证；  
Assist foreign employees to obtain business visas (valid for 70 days). If employment exceeds 70 days, employees should apply for a resident permit and a multiple entry visa. If the foreign employee exceeds 90 consecutive days of residence and employment in Myanmar, application to obtain foreign registration certificate should be made;
- 依法提交公司秘书文件。  
Submit company secretary documents according to law.

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