

## Key Regulatory Obligations

As someone in the Czech Republic office, you should know that:

- EU Anti-Money Laundering Directives (AMLD), Czech AML Act and AML regulations apply to the branch.
- Goldman Sachs (GS) employees have a legal obligation to report suspicious activity to the Money Laundering Reporting Officer (MLRO) (or in their absence, other members of Financial Crime Compliance (FCC)) as soon as possible if that employee knows or suspects, or has reasonable grounds for knowing or suspecting, that a person is engaged in money laundering, terrorist financing or proliferation financing.
- For any new and existing business relationship, GSAM B.V. entities must adhere to the firm's "Know Your Customer" and "Enhanced Due Diligence" requirements ("KYC", "EDD")
- GS employees must immediately report any knowledge or suspicion of tax evasion and the facilitation of tax evasion to their supervisor, their local compliance officer, the appropriate MLRO, and/or FCC.

## Protocols

Here are the protocols that must be followed:

- [Framework for GSAM B.V. Czech Republic Branch](#) which provides key regulatory guidelines in light of local law, regulations, regulatory guidance and market practice.
- [Firmwide policy on anti-facilitation of tax evasion](#) which codifies the firm's commitment to comply with all applicable laws and regulations designed to prevent the facilitation of tax evasion

## Risks

Failure to follow these protocols poses the following risks:

- Individual can be held personally liable if an infringement was made intentionally or through gross negligence
- Failing to report suspicious activity could also lead to a client bringing a civil claim against the Firm
- Reputational risks of being associated with tax evasion and other financial crime offences

## Consequences

The consequences of non-compliance include:

- Penalties for non-compliance reach extreme levels, with penalties of up to CZK 130,000,000 or 10% of the net annual turnover being the upper limit for the most serious offenses and up to 15 years
- The corporate offence carries substantial monetary fines, asset seizure, business restrictions, license revocation and, in severe circumstances, dissolution.

## The Bottom Line

**Report Suspicious Activity or Issues That May Raise Money Laundering Concerns to Your Compliance Officer or to FCC**

## Contacts

For any questions or concerns for GSAM B.V. Czech please reach out to the [Money Laundering Reporting Officer \("MLRO"\)](#), Xenia Chen, or [gs-fcc-gsamby](#)

## Additional Information

- The Regulations also require adherence to the record keeping and retention requirements with precautions for the protection of personal data. GSAM B.V. and all branches must adhere to the GSAM B.V. group-wide requirements respectively and employees are expected to be familiar with the applicable policies.
- Become familiar with any local laws, rules and regulations that may impose specific anti-bribery / anti-corruption legal or compliance requirements in Czech Republic. Please notify the Anti-Bribery Group of any new or changed requirements, which may require the Anti-Bribery Group to assess whether the firm's existing controls are sufficient to ensure compliance with such requirements.