

Key Regulatory Obligations		Protocols
<ul style="list-style-type: none"><li>■ The German Banking Act requires all criminal acts to be escalated to the MLRO.</li><li>■ You must follow Germany-specific “Know Your Customer” requirements (“KYC”)</li><li>■ You must follow Anti-Money Laundering Act (or the Geldwäschegesetz or the GwG), applicable European Directives (e.g. 5<sup>th</sup> Money Laundering Directive and 6<sup>th</sup> Money Laundering Directive), GSBE Group-Wide Requirements (under §9 GwG) and Market Abuse Regulations, German Banking Act, amongst others.</li><li>■ Key policies available on GS Docs: <a href="#">Policy on Suspicious Money Laundering</a> <a href="#">Policy on Anti-Money Laundering Policies and Procedures</a>, <a href="#">Policy on Guidelines for Client Identification</a> and <a href="#">Policy Regarding Transparency Register Discrepancies</a></li></ul>		<p>Employees have a legal responsibility to report a concern to the MLRO or the deputy MLRO 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 or terrorist financing in general dealings with the applicant because of the nature of the transactions or settlement pattern of the client or for any other reason.</p> <p>This is regardless of whether the person is a client, prospective client, counterparty or other third party, and whether this knowledge or suspicion arises during the process of verification.</p>
Risks	Consequences	
<p>Failure to follow these protocols poses the following risks:</p> <ul style="list-style-type: none"><li>■ To disciplinary action, possibly including immediate dismissal.</li><li>■ Money Laundering, Terrorism Financing, Bribery and Corruption, Market Abuse, Fraud and Tax offences</li></ul>	<p>The consequences of non-compliance include:</p> <ul style="list-style-type: none"><li>■ Fine between EUR 1 to 5 Million or 10% of the gross income of the entity in the preceding year, whichever is higher. In other cases, a fine up to EUR 100,000 may be imposed.</li><li>■ Regulatory action on personal level against individuals, appointment of monitorships and regulatory intervention in internal governance and operations.</li></ul>	
The Bottom Line		
<p><b>Money laundering, terrorist financing and fraud and any involvement therein is a criminal action. We expect all employees to strictly comply with the applicable regulations and policies.</b></p>		
Contacts		
<p>Report Suspicious Activity or Issues That May Raise Money Laundering Concerns to the <a href="#">Money Laundering Reporting Officer (“MLRO”)</a> Marc Eymelt, MLRO or Laura Griffiths, Deputy MLRO.</p> <p>NOTE: The client must not be informed that we have any suspicion or that the authorities have been informed under any circumstances.</p> <p>An alternative reporting channel is also available if you wish to remain anonymous - 069 7532 1222 (87532 1222)</p>		
Additional Information		
<p><b>The Money Laundering Regulations</b> require the following:</p> <ul style="list-style-type: none"><li>• Ongoing monitoring of the relationship and transactions</li><li>• Reporting suspected money laundering or terrorism financing without delay.</li><li>• Adherence to the record keeping and retention requirements and precautions for the protection of personal data.</li><li>• All GSBE branches must adhere to the GSBE group-wide requirements, and employees are expected to be familiar with the applicable policies for the GSBE branch location.</li><li>• The sanctions may range from punitive fees, temporary ban on operations, judicial supervision to permanent closure and the BaFin publishes orders issued to institutions to improve their AML measures on its <a href="#">website</a></li><li>• Become familiar with any local laws, rules and regulations that may impose specific anti-bribery / anti-corruption legal or compliance requirements for GSBE branches. 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.</li></ul>		