

Key Regulatory Obligations	Protocols/ Reporting
<p>As someone in the Spain office, you should know that:</p> <ul style="list-style-type: none"> ■ Law 10/2010 and Royal Decree 304/2014 are the applicable local regulation on the prevention of money laundering and terrorist financing ■ The firm policy adheres to the Law and Royal Decree which are applicable to Madrid Branches of GSI, GSBE and GSAM B.V. as well as to any activity conducted between the Spanish branches and/or with other GS entities, and external entities ■ Article 31 bis of the Spanish Criminal Code stipulates that an effectively implemented compliance programme could serve as means of corporate defence from certain crimes committed by its directors or employees on its behalf ■ New SoW guidance as per Article 10 of Law 10/2010 and Article 19 of RD 304/2014, GS Spain Entities must in any cases adopt adequate measures to determine the origin of the wealth and funds and apply Enhanced Due Diligence for PWM clients ■ Mandatory AML Annual External Audits of GS Spain Entities & PWM Annual Training 	<p>Here are the protocols that must be followed:</p> <ul style="list-style-type: none"> ■ Implement adequate policies and procedures on customer due diligence: appoint a director or senior manager to act as a representative to the SEPBLAC (AML Authority); adopt an appropriate manual for the prevention of money laundering and terrorist financing; and establish internal control measures ■ Policy for Anti-Money Laundering for All Goldman Sachs – Spain: English and Spanish versions ■ Catálogo de Operaciones de Riesgo de Blanqueo de Capitales (ML Risk transactions catalogue) ■ Corporate Defence Crime Risk Prevention Manuals for GSBE and GSI ■ Mandatory Reports to SEPBLAC of suspicious transactions and activities (SARs), high risk jurisdictions wire transfers and annual AML Questionnaire
Risks	Consequences
<p>Failure to follow these protocols poses the following risks:</p> <ul style="list-style-type: none"> ■ Main related offences under the Spanish Criminal Code: <ul style="list-style-type: none"> ➢ Money Laundering, Terrorism Financing, Bribery, Market Abuse, Accounting Fraud, Fraud, Corruption, and Tax offences 	<p>The consequences of non-compliance include:</p> <ul style="list-style-type: none"> ■ Criminal penalties (Spanish Criminal Code) that may vary depending on the gravity of the infraction ■ Administrative sanctions (Law 10/2010) that may vary depending on the gravity of the infraction
The Bottom Line	
Report Suspicious Activity or Issues That May Raise Money Laundering Concerns to Your Compliance Officer or to FCC	
Contacts	
<p>Reach out to your respective Money Laundering Reporting Officer (MLRO) Spain Compliance: Pilar Aranguren / Carla Caceres / Gonzalo Aviles or gs-compliance-spain</p> <p>Additional FCC contacts: EMEA Escalations - gs-aml-ldn-escalations Suspicious Activity Reporting Hotline (Global): +1 (917) 343-3691 AML/KYC (gs-fcc-kyc-strategy) Gov't Sanctions (gs-fcc-sanctionsgroup) Anti-Bribery Team(gs-antibribery-group) Conduct & Integrity (gs-conductandintegrity)</p>	
Additional Information	
<ul style="list-style-type: none"> ■ Be familiar with the GS Business Integrity Program through which you can report any integrity concerns that might raise a legal, compliance, ethical, accounting, internal accounting control, auditing, personnel, health, safety, environmental, discrimination or other firm policy issue. ■ Become familiar with any local laws, rules and regulations that may impose specific anti-bribery / anti-corruption legal or compliance requirements in Spain. Please notify the Anti-Bribery Team of any new or changed requirements, which may require the Anti-Bribery Team to assess whether the firm's existing controls are sufficient to ensure compliance with such requirements. 	