

## Key Regulatory Obligations

As someone in the Ireland office, you should know that:

- Goldman Sachs employee who knows or suspects, or has reasonable grounds for suspecting, that any person (whether or not this is a client, prospective client, counterparty or other third party) is engaged in money laundering or terrorist financing - has a legal responsibility to report the concern to the MLRO or, in their absence, other members of Financial Crime Compliance as soon as possible.
- To avoid committing the 'tipping-off' offence, employees must not disclose any information, which is likely to prejudice an investigation into money laundering and/or terrorist financing. This includes the fact that a suspicion has been raised and reported.

## Protocols

The key legislation which deals with AML / CTF in Ireland is the Criminal Justice Acts ("CJA"). Here are the related internal protocols that must be followed:

- [GSBE Ireland AML Manual](#)
- [Firmwide Policy on Escalation](#)
- [Policy of Suspicious of Money Laundering](#)
- [Goldman Sachs Irish Funds Anti-Money Laundering Manual Policy](#)

Anyone in doubt over the application of these procedures must liaise with the MLRO or other members of the Financial Crime Compliance Group ("FCC").

## Risks

Failure to follow these protocols poses the following risks:

- Money Laundering, Terrorist Financing, Bribery and Corruption, Fraud and Market Abuse offences.

## Consequences

The consequences of non-compliance include:

- Failure to do so at the first available opportunity could result in a prison sentence of up to five years, an unlimited fine and/or dismissal

## The Bottom Line

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

## Contacts

For any questions or concerns please reach out to the [Money Laundering Reporting Officer \("MLRO"\)](#) Laura Griffiths, Edward McMahon, Julian Broxup or the EMEA Escalations Team: [gs-aml-ldn-escalations](mailto:gs-aml-ldn-escalations)

## Additional Information

- All GSBE, GSI and GSAMFSL offices must adhere to the GSBE, GSI and GSAMFSL group-wide requirements, and employees are expected to be familiar with the applicable policies.
- Adherence to the record keeping and retention requirements and precautions for the protection of personal data.
- Become familiar with any local laws, rules and regulations that may impose specific anti-bribery / anti-corruption legal or compliance requirements for Ireland. 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.