

Key Regulatory Obligations	Protocols
<p>As someone in the GSI QFC Branch office, you should know that:</p> <ul style="list-style-type: none">■ You are subject to Qatar Federal AML Laws in addition to the QFCRA AML Rulebook.■ You must escalate any AML related issues of concern to the MLRO.	<p>Here are the protocols that must be followed:</p> <ul style="list-style-type: none">■ CDD – Please refer to the Goldman Sachs International, QFC Branch Anti-Money Laundering Policy■ If you have suspicions, please escalate to the MLRO■ DO NOT tip off the client■ Record retention requirement of 10 years
Risks	Consequences
<p>Failure to follow these protocols poses the following risks:</p> <ul style="list-style-type: none">■ Regulatory Scrutiny■ Reputational Risk■ Fines and other penalties	<p>The consequences of non-compliance include:</p> <ul style="list-style-type: none">■ Penalties for tipping off can range from up to three years imprisonment and/or a fine of up to QAR 500,000. Same penalties apply for not escalating suspicious transactions.
The Bottom Line	
<p>You are the first line of defense...if you see something or have any concerns, escalate.</p>	
Contacts	
<p>For any questions, please reach out to Money Laundering Regional Officer (MLRO) Herlina Susilo, Basima Motiwala, or Eka Pipiya</p>	
Additional Information	
<ul style="list-style-type: none">■ Please note that you are subject to “Relevant Regulations” listed above and the firm’s policies and procedures which include the Goldman Sachs International, QFC Branch Anti-Money Laundering Policy■ Embargo against Qatar no longer applies: No explicit prohibition against conducting business with Qatar but any significant Qatari business or touchpoints will go through an enhanced vetting process (which will include further scrutiny from AML Compliance, BIG, Legal, relevant committees (i.e. Suitability Committee etc). Please escalate any new Qatari business, touchpoints, etc. at the earliest possible stage to ensure all relevant teams are made aware of deal/transaction so relevant checks can be completed asap.	