

Key Regulatory Obligations

- 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, GS UK entities must adhere to the firm's "Know Your Customer" requirements ("KYC"), as prescribed within the GS [UK AML Manual](#)
- GS employees must immediately report any knowledge or suspicion of tax evasion or fraud and the facilitation of tax evasion or fraud to their supervisor, their local compliance officer, their MLRO, and/or FCC
- The key UK regulation applicable are The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) 2017 and the Proceeds of Crime Act 2002

Protocols

Here are the protocols that must be followed:

- [Policy on Escalation](#) which was introduced for individuals based in the UK in accordance with new FCA rules on whistleblowing
- [UK AML Manual for KYC/ EDD requirements](#)
- [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:

- Failure to report such suspicions of money laundering is punishable by up to 5 years imprisonment and/or an unlimited fine or dismissal from the firm
- Penalty of up to 14 years imprisonment for assisting a money launderer
- The corporate offence carries an unlimited fine, if the firm is found to have failed to prevent the facilitation of tax evasion, it risks facing a substantial financial penalty

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 please reach out to the [Money Laundering Reporting Officer \("MLRO"\)](#), Julian Broxup, or the EMEA Escalations Team: [gs-aml-ldn-escalations](#)

Additional Information

- The Regulations also require adherence to the record keeping and retention requirements with precautions for the protection of personal data. All GSBE, GS Bank USA, London Branch, GSIB and GSI branches must adhere to the GSBE, GS Bank USA, London Branch, GSIB and GSI 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 UK. 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.