

BrokerCheck Report

MERCER ALLIED COMPANY, L.P.

CRD# 37404

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When communicating online or investing with any professional, make sure you know who you're dealing with. [Imposters](#) might link to sites like BrokerCheck from [phishing](#) or similar scam websites, or through [social media](#), trying to steal your personal information or your money.

Please contact FINRA with any concerns.

About BrokerCheck®



BrokerCheck offers information on all current, and many former, registered securities brokers, and all current and former registered securities firms. FINRA strongly encourages investors to use BrokerCheck to check the background of securities brokers and brokerage firms before deciding to conduct, or continue to conduct, business with them.

- **What is included in a BrokerCheck report?**

- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.

- Please note that the information contained in a BrokerCheck report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

- **Where did this information come from?**

- The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:
 - information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
 - information that regulators report regarding disciplinary actions or allegations against firms or brokers.

- **How current is this information?**

- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.

- **What if I want to check the background of an investment adviser firm or investment adviser representative?**

- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at <https://www.adviserinfo.sec.gov>. In the alternative, you may search the IAPD website directly or contact your state securities regulator at <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414>.

- **Are there other resources I can use to check the background of investment professionals?**

- FINRA recommends that you learn as much as possible about an investment professional before deciding to work with them. Your state securities regulator can help you research brokers and investment adviser representatives doing business in your state.

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Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at brokercheck.finra.org



For additional information about the contents of this report, please refer to the User Guidance or www.finra.org/brokercheck. It provides a glossary of terms and a list of frequently asked questions, as well as additional resources. [For more information about FINRA, visit www.finra.org.](http://www.finra.org)



MERCER ALLIED COMPANY, L.P.

CRD# 37404

SEC# 8-47739

Main Office Location

100 COLISEUM DRIVE
COHOES, NY 12047
Regulated by FINRA Woodbridge Office

Mailing Address

100 COLISEUM DRIVE
COHOES, NY 12047

Business Telephone Number

518 886-4000

Report Summary for this Firm

This report summary provides an overview of the brokerage firm. Additional information for this firm can be found in the detailed report.

Firm Profile

This firm is classified as a partnership.

This firm was formed in Delaware on 10/11/1994.

Its fiscal year ends in December.

Firm History

Information relating to the brokerage firm's history such as other business names and successions (e.g., mergers, acquisitions) can be found in the detailed report.

Firm Operations

This firm is registered with:

- the SEC
- 1 Self-Regulatory Organization
- 53 U.S. states and territories

Is this brokerage firm currently suspended with any regulator? **No**

This firm conducts 5 types of businesses.

This firm is affiliated with financial or investment institutions.

This firm has referral or financial arrangements with other brokers or dealers.

Disclosure Events

Brokerage firms are required to disclose certain criminal matters, regulatory actions, civil judicial proceedings and financial matters in which the firm or one of its control affiliates has been involved.

Are there events disclosed about this firm? **No**

The number of disclosures from non-registered control affiliates is 86



Firm Profile

This firm is classified as a partnership.

This firm was formed in Delaware on 10/11/1994.

Its fiscal year ends in December.

Firm Names and Locations

This section provides the brokerage firm's full legal name, "Doing Business As" name, business and mailing addresses, telephone number, and any alternate name by which the firm conducts business and where such name is used.

MERCER ALLIED COMPANY, L.P.

Doing business as MERCER ALLIED COMPANY, L.P.

CRD# 37404

SEC# 8-47739

Main Office Location

100 COLISEUM DRIVE
COHOES, NY 12047

Regulated by FINRA Woodbridge Office

Mailing Address

100 COLISEUM DRIVE
COHOES, NY 12047

Business Telephone Number

518 886-4000



Firm Profile

This section provides information relating to all direct owners and executive officers of the brokerage firm.

Direct Owners and Executive Officers

Legal Name & CRD# (if any): GOLDMAN SACHS WEALTH SERVICES, L.P.

106693

Is this a domestic or foreign entity or an individual? Domestic Entity

Position SOLE LIMITED PARTNER

Position Start Date 10/1994

Percentage of Ownership 75% or more

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): GS AYCO HOLDING LLC

Is this a domestic or foreign entity or an individual? Domestic Entity

Position GENERAL PARTNER

Position Start Date 07/2003

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): HALL, LARIK MARSHALL

2634322

Is this a domestic or foreign entity or an individual? Individual

Position PRESIDENT

Position Start Date 07/2024

Firm Profile



Direct Owners and Executive Officers (continued)

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): KINOWSKI, KYLE T
4277862

Is this a domestic or foreign entity or an individual? Individual

Position VICE PRESIDENT

Position Start Date 06/2024

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): LUKS, SHELLEY M
6004389

Is this a domestic or foreign entity or an individual? Individual

Position VP & CHIEF FINANCIAL OFFICER

Position Start Date 04/2014

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): NASS, JEREMY PAUL

Firm Profile



Direct Owners and Executive Officers (continued)

	4244509
Is this a domestic or foreign entity or an individual?	Individual
Position	VP & CHIEF OPERATIONS OFFICER
Position Start Date	06/2024
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	RYAN, DIANA ELIZABETH 2780148
Is this a domestic or foreign entity or an individual?	Individual
Position	VP & CHIEF COMPLIANCE OFFICER
Position Start Date	06/2024
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	VOLSKY, MELISSA C 4648752
Is this a domestic or foreign entity or an individual?	Individual
Position	VICE PRESIDENT
Position Start Date	07/2024
Percentage of Ownership	Less than 5%

Firm Profile



Direct Owners and Executive Officers (continued)

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No



Firm Profile

This section provides information relating to any indirect owners of the brokerage firm.

Indirect Owners

Legal Name & CRD# (if any):	GS AYCO HOLDING LLC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	SARATOGA SPRINGS LLC
Relationship to Direct Owner	SOLE MEMBER AND MANAGER
Relationship Established	07/2003
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	GS AYCO HOLDING LLC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	GOLDMAN SACHS WEALTH SERVICES, L.P.
Relationship to Direct Owner	LIMITED PARTNER
Relationship Established	07/2003
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	IMD HOLDINGS LLC
Is this a domestic or foreign entity or an individual?	Domestic Entity

Firm Profile



Indirect Owners (continued)

Company through which indirect ownership is established	GS AYCO HOLDING LLC
Relationship to Direct Owner	SOLE MEMBER AND MANAGER
Relationship Established	11/2017
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	THE GOLDMAN SACHS GROUP, INC.
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	IMD HOLDINGS LLC
Relationship to Direct Owner	SOLE MEMBER AND MANAGER
Relationship Established	11/2017
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	Yes

Legal Name & CRD# (if any):	SARATOGA SPRINGS LLC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	GOLDMAN SACHS WEALTH SERVICES, L.P.
Relationship to Direct Owner	GENERAL PARTNER
Relationship Established	07/2003

Firm Profile



Indirect Owners (continued)

Percentage of Ownership	Other General Partners
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Firm History

This section provides information relating to any successions (e.g., mergers, acquisitions) involving the firm.

No information reported.





Firm Operations

Registrations

This section provides information about the regulators (Securities and Exchange Commission (SEC), self-regulatory organizations (SROs), and U.S. states and territories) with which the brokerage firm is currently registered and licensed, the date the license became effective, and certain information about the firm's SEC registration.

This firm is currently registered with the SEC, 1 SRO and 53 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	11/15/1994

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

A broker-dealer and government securities broker or dealer: No

A government securities broker or dealer only: No

This firm has ceased activity as a government securities broker or dealer: No

Self-Regulatory Organization	Status	Date Effective
FINRA	Approved	11/08/1994



Firm Operations

Registrations (continued)

U.S. States & Territories	Status	Date Effective
Alabama	Approved	12/14/1994
Alaska	Approved	11/15/1994
Arizona	Approved	12/23/1994
Arkansas	Approved	02/13/1995
California	Approved	12/09/1994
Colorado	Approved	11/08/1994
Connecticut	Approved	11/22/1994
Delaware	Approved	12/13/1994
District of Columbia	Approved	11/23/1994
Florida	Approved	12/09/1994
Georgia	Approved	11/30/1994
Hawaii	Approved	05/02/1995
Idaho	Approved	11/09/1994
Illinois	Approved	11/10/1994
Indiana	Approved	12/12/1994
Iowa	Approved	11/17/1994
Kansas	Approved	12/22/1994
Kentucky	Approved	12/05/1994
Louisiana	Approved	11/30/1994
Maine	Approved	12/01/1994
Maryland	Approved	11/16/1994
Massachusetts	Approved	12/01/1994
Michigan	Approved	11/30/1994
Minnesota	Approved	12/05/1994
Mississippi	Approved	12/01/1994
Missouri	Approved	12/06/1994
Montana	Approved	11/10/1994
Nebraska	Approved	11/10/1994
Nevada	Approved	12/08/1994
New Hampshire	Approved	12/08/1994
New Jersey	Approved	12/06/1994
New Mexico	Approved	11/22/1994
New York	Approved	11/08/1994

U.S. States & Territories	Status	Date Effective
North Carolina	Approved	12/05/1994
North Dakota	Approved	12/06/1994
Ohio	Approved	12/14/1994
Oklahoma	Approved	11/22/1994
Oregon	Approved	12/08/1994
Pennsylvania	Approved	11/16/1994
Puerto Rico	Approved	06/10/2014
Rhode Island	Approved	12/02/1994
South Carolina	Approved	12/05/1994
South Dakota	Approved	12/06/1994
Tennessee	Approved	12/20/1994
Texas	Approved	12/16/1994
Utah	Approved	11/22/1994
Vermont	Approved	12/07/1994
Virgin Islands	Approved	10/06/2014
Virginia	Approved	11/16/1994
Washington	Approved	12/09/1994
West Virginia	Approved	12/05/1994
Wisconsin	Approved	11/21/1994
Wyoming	Approved	02/03/2003

Firm Operations



Types of Business

This section provides the types of business, including non-securities business, the brokerage firm is engaged in or expects to be engaged in.

This firm currently conducts 5 types of businesses.

Types of Business

Mutual fund underwriter or sponsor
Mutual fund retailer
Broker or dealer selling variable life insurance or annuities
Private placements of securities
Broker or dealer involved in a networking, kiosk or similar arrangment with a: insurance company or agency

Firm Operations



Clearing Arrangements

This firm does not hold or maintain funds or securities or provide clearing services for other broker-dealer(s).

Introducing Arrangements

This firm does refer or introduce customers to other brokers and dealers.

Name:	GOLDMAN SACHS & CO. LLC
CRD #:	361
Business Address:	200 WEST STREET NEW YORK, NY 10282
Effective Date:	03/11/2005
Description:	MERCER ALLIED COMPANY, L.P. HAS ENTERED INTO AN INTERCOMPANY REFERRAL AGREEMENT WITH GOLDMAN, SACHS & CO. FOR BROKERAGE SERVICES AND RELATED INVESTMENTS.

Firm Operations

Industry Arrangements



This firm does have books or records maintained by a third party.

Name:	GOLDMAN SACHS & CO. LLC
CRD #:	361
Business Address:	200 WEST STREET NEW YORK, NY 10282
Effective Date:	08/20/2007
Description:	MERCER ALLIED COMPANY, L.P. RELIES ON GOLDMAN, SACHS & CO., ITS AFFILIATE, FOR ELECTRONIC STORAGE MEDIA.

This firm does not have accounts, funds, or securities maintained by a third party.

This firm does not have customer accounts, funds, or securities maintained by a third party.

Control Persons/Financing

This firm does not have individuals who control its management or policies through agreement.

This firm does not have individuals who wholly or partly finance the firm's business.



Firm Operations

Organization Affiliates

This section provides information on control relationships the firm has with other firms in the securities, investment advisory, or banking business.

This firm is, directly or indirectly:

- in control of
 - controlled by
 - or under common control with
- the following partnerships, corporations, or other organizations engaged in the securities or investment advisory business.

GOLDMAN SACHS ICBC WEALTH MANAGEMENT CO., LTD is under common control with the firm.

Business Address:	6TH FLOOR, ICBC TOWER (SHANGHAI) 16 YINCHENG ROAD, CHINA PILOT FREE TRADE ZONE SHANGHAI, CHINA 200120
Effective Date:	08/01/2022
Foreign Entity:	Yes
Country:	CHINA
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

FOLIO INVESTMENTS, INC. is under common control with the firm.

CRD #:	48015
Business Address:	8180 GREENSBORO DR 8TH FLOOR MCLEAN, VA 22102
Effective Date:	09/18/2020
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

Firm Operations



Organization Affiliates (continued)

GS INVESTMENT STRATEGIES CANADA INC. is under common control with the firm.

Business Address: 925 WEST GEORGIA STREET
SUITE 530
VANCOUVER, CANADA V6C 3LC

Effective Date: 12/12/2019

Foreign Entity: Yes

Country: CANADA

Securities Activities: No

Investment Advisory Activities: Yes

Description: THE ENTITY AND THE FIRM ARE UNDER COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS ASSET MANAGEMENT (HONG KONG) LIMITED is under common control with the firm.

CRD #: 286066

Business Address: CHEUNG KONG CENTER, 68TH FLOOR
2 QUEEN'S ROAD CENTRAL
HONG KONG, PEOPLE'S REPUBLIC OF CHINA

Effective Date: 06/24/2016

Foreign Entity: Yes

Country: HONG KONG

Securities Activities: No

Investment Advisory Activities: Yes

Description: THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS ASSET MANAGEMENT (SINGAPORE) PTE. LTD. is under common control with the firm.

CRD #: 286067

Business Address: 1 RAFFLES LINK
#07-01 SOUTH LOBBY
SINGAPORE, SINGAPORE 039393

Effective Date: 06/02/2015

Firm Operations



Organization Affiliates (continued)

Foreign Entity: Yes

Country: SINGAPORE

Securities Activities: No

Investment Advisory Activities: Yes

Description: THE ENTITY AND FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS MEXICO, CASA DE BOLSA, S.A. DE C.V. is under common control with the firm.

Business Address: PRADO SUR 250 PISO 1
LOMAS DE CHAPULTEPEC
MIGUEL HIDALGO D.F., MEXICO 11000

Effective Date: 02/13/2014

Foreign Entity: Yes

Country: MEXICO

Securities Activities: Yes

Investment Advisory Activities: No

Description: THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

QIAN KUN FUTURES CO., LTD. is under common control with the firm.

Business Address: 1 ZHONG XIN SI ROAD
16TH FLOOR, TOWER ONE, KERRY PLAZA
SHENZHEN, PEOPLE'S REPUBLIC OF CHINA 518048

Effective Date: 11/15/2012

Foreign Entity: Yes

Country: PEOPLE'S REPUBLIC OF CHINA

Securities Activities: Yes

Investment Advisory Activities: No

Description: THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

Firm Operations



Organization Affiliates (continued)

GOLDMAN SACHS INVESTMENTS (MAURITIUS) I LIMITED is under common control with the firm.

Business Address:	CHEUNG KONG CENTER, 68TH FLOOR 2 QUEEN'S ROAD CENTRAL HONG KONG, PEOPLE'S REPUBLIC OF CHINA
Effective Date:	07/07/2011
Foreign Entity:	Yes
Country:	MAURITIUS
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS ASSET MANAGEMENT (INDIA) PRIVATE LIMITED is under common control with the firm.

Business Address:	RATIONAL HOUSE 951-A, APPASAHEB MARATHE MARG, PRABHADEVI MUMBAI, INDIA 400 025
Effective Date:	03/10/2008
Foreign Entity:	Yes
Country:	INDIA
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS DO BRASIL BANCO MULTIPLO S/A is under common control with the firm.

Business Address:	RUO LEOPOLDO COUTO DE MAGALHAES JUNIOR 700 16 ANDAR, ITAIM BIBI SAO PAULO, BRAZIL 04542-000
Effective Date:	03/19/2001
Foreign Entity:	Yes
Country:	BRAZIL

Firm Operations



Organization Affiliates (continued)

Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS FINANCIAL MARKETS PTY LTD is under common control with the firm.

Business Address:	GOVERNOR PHILLIP TOWER 1 FARRER PLACE SYDNEY, AUSTRALIA NSW 2000
Effective Date:	09/30/2010
Foreign Entity:	Yes
Country:	AUSTRALIA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS SAUDI ARABIA is under common control with the firm.

Business Address:	25TH FLOOR, KINGDOM TOWER PO BOX 52969 RIYADH, SAUDI ARABIA 11573
Effective Date:	03/01/2011
Foreign Entity:	Yes
Country:	SAUDI ARABIA
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS ASSET MANAGEMENT CO., LTD. is under common control with the firm.

CRD #:	283221
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Firm Operations



Organization Affiliates (continued)

Business Address: ROPPONGI HILLS MORI TOWER
10-1 ROPPONGI 6-CHOME
MINATO-KU, TOKYO, JAPAN 106-6147

Effective Date: 04/01/2002

Foreign Entity: Yes

Country: JAPAN

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS DO BRASIL CORRETORA DE TITULOS E VALORES MOBILIARIOS S/A is under common control with the firm.

Business Address: RUA LEOPOLDO COUTO DE MAGALHAES JUNIOR 700
16 ANDAR, ITAIM BIBI
SAO PAULO, BRAZIL 04542-000

Effective Date: 09/24/2008

Foreign Entity: Yes

Country: BRAZIL

Securities Activities: Yes

Investment Advisory Activities: No

Description: THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS (INDIA) SECURITIES PRIVATE LIMITED is under common control with the firm.

Business Address: RATIONAL HOUSE
951-A, APPASAHEB MARATHE MARG, PRABHADEVI
MUMBAI, INDIA 400 025

Effective Date: 05/30/2007

Foreign Entity: Yes

Country: INDIA

Securities Activities: Yes

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities:	No
Description:	THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS (CHINA) SECURITIES COMPANY LIMITED is under common control with the firm.

Business Address:	WINLAND INTERNATIONAL CENTER, 18TH FLOOR 7 FINANCE STREET, XICHENG DISTRICT BEIJING, PEOPLE'S REPUBLIC OF CHINA 100033
Effective Date:	03/03/2005
Foreign Entity:	Yes
Country:	PEOPLE'S REPUBLIC OF CHINA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS AUSTRALIA PTY LTD is under common control with the firm.

Business Address:	LEVEL 17 101 COLLINS STREET MELBOURNE, AUSTRALIA VIC 3000
Effective Date:	09/12/2003
Foreign Entity:	Yes
Country:	AUSTRALIA
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS NEW ZEALAND LIMITED is under common control with the firm.

Business Address:	LEVEL 39, VERO CENTRE 48 SHORTLAND STREET AUCKLAND, NEW ZEALAND 1010
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Firm Operations



Organization Affiliates (continued)

Effective Date:	09/12/2003
Foreign Entity:	Yes
Country:	NEW ZEALAND
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS ASSET MANAGEMENT AUSTRALIA PTY LTD is under common control with the firm.

Business Address:	LEVEL 17 101 COLLINS STREET MELBOURNE, AUSTRALIA VIC 3000
Effective Date:	09/12/2003
Foreign Entity:	Yes
Country:	AUSTRALIA
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS & CO. LLC is under common control with the firm.

CRD #:	361
Business Address:	200 WEST STREET NEW YORK, NY 10282
Effective Date:	07/01/2003
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE

Firm Operations



Organization Affiliates (continued)

GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS (ASIA) FINANCE is under common control with the firm.

Business Address: CHEUNG KONG CENTER, 68TH FLOOR
2 QUEEN'S ROAD CENTRAL
HONG KONG, PEOPLE'S REPUBLIC OF CHINA

Effective Date: 07/01/2003

Foreign Entity: Yes

Country: MAURITIUS

Securities Activities: Yes

Investment Advisory Activities: No

Description: THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS FUTURES PTE LTD is under common control with the firm.

Business Address: 1 RAFFLES LINK
#07-01 SOUTH LOBBY
SINGAPORE, SINGAPORE 039393

Effective Date: 07/01/2003

Foreign Entity: Yes

Country: SINGAPORE

Securities Activities: Yes

Investment Advisory Activities: No

Description: THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS BANK AG is under common control with the firm.

Business Address: CLARIDENSTRASSE 25
ZURICH, SWITZERLAND 8002

Effective Date: 07/01/2003

Foreign Entity: Yes

Country: SWITZERLAND

Firm Operations



Organization Affiliates (continued)

Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS (ASIA) SECURITIES LIMITED is under common control with the firm.

Business Address:	CHEUNG KONG CENTER, 68TH FLOOR 2 QUEEN'S ROAD CENTRAL HONG KONG, PEOPLE'S REPUBLIC OF CHINA NA
Effective Date:	07/01/2003
Foreign Entity:	Yes
Country:	HONG KONG
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS FINANCIAL MARKETS, L.P. is under common control with the firm.

CRD #:	47340
Business Address:	200 WEST STREET NEW YORK, NY 10282
Effective Date:	07/01/2003
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS PARIS INC. ET CIE is under common control with the firm.

Business Address:	5 AVENUE KLEBER
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Firm Operations



Organization Affiliates (continued)

PARIS, FRANCE 75116

Effective Date: 07/01/2003

Foreign Entity: Yes

Country: FRANCE

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS JAPAN CO., LTD. is under common control with the firm.

Business Address: ROPPONGI HILLS MORI TOWER
10-1 ROPPONGI 6-CHOME
MINATO-KU, TOKYO, JAPAN 106-6147

Effective Date: 07/01/2003

Foreign Entity: Yes

Country: JAPAN

Securities Activities: Yes

Investment Advisory Activities: No

Description: THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS ASSET MANAGEMENT INTERNATIONAL is under common control with the firm.

CRD #: 107715

Business Address: PLUMTREE COURT
25 SHOE LANE
LONDON, UNITED KINGDOM EC4A 4AU

Effective Date: 07/01/2003

Foreign Entity: Yes

Country: UNITED KINGDOM

Securities Activities: No

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities: Yes

Description: THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS ASSET MANAGEMENT, L.P. is under common control with the firm.

CRD #: 107738

Business Address: 200 WEST STREET
NEW YORK, NY 10282

Effective Date: 07/01/2003

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS BANK EUROPE SE is under common control with the firm.

Business Address: MARIENTURM
TAUNUSANLAGE 9-10
FRANKFURT AM MAIN, GERMANY 60329

Effective Date: 07/01/2003

Foreign Entity: Yes

Country: GERMANY

Securities Activities: Yes

Investment Advisory Activities: No

Description: THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS (SINGAPORE) PTE is under common control with the firm.

Business Address: 1 RAFFLES LINK
#07-01 SOUTH LOBBY
SINGAPORE, SINGAPORE 039393

Firm Operations



Organization Affiliates (continued)

Effective Date: 07/01/2003

Foreign Entity: Yes

Country: SINGAPORE

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS CANADA INC. is under common control with the firm.

Business Address: 77 KING STREET WEST, SUITE 3400
P.O. BOX 38
TORONTO, ONTARIO M5K 1B7

Effective Date: 07/01/2003

Foreign Entity: Yes

Country: TORONTO

Securities Activities: Yes

Investment Advisory Activities: No

Description: THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS (ASIA) L.L.C. is under common control with the firm.

Business Address: CHEUNG KONG CENTER, 68TH FLOOR
2 QUEEN'S ROAD CENTRAL
HONG KONG, PEOPLE'S REPUBLIC OF CHINA

Effective Date: 07/01/2003

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE

Firm Operations



Organization Affiliates (continued)

GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS INTERNATIONAL is under common control with the firm.

Business Address:	PLUMTREE COURT 25 SHOE LANE LONDON, ENGLAND, UNITED KINGDOM EC4A 4AU
Effective Date:	07/01/2003
Foreign Entity:	Yes
Country:	UNITED KINGDOM
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

GOLDMAN SACHS WEALTH SERVICES, L.P. is under common control with the firm.

CRD #:	106693
Business Address:	100 COLISEUM DRIVE COHOES, NY 12047
Effective Date:	12/09/1994
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	THE ENTITY AND THE FIRM ARE UNDER THE COMMON CONTROL OF THE GOLDMAN SACHS GROUP, INC.

This firm is directly or indirectly, controlled by the following:

- bank holding company
- national bank
- state member bank of the Federal Reserve System
- state non-member bank
- savings bank or association
- credit union

Firm Operations



Organization Affiliates (continued)

- or foreign bank

THE GOLDMAN SACHS GROUP, INC. is a Bank Holding Company and controls the firm.

Business Address: 200 WEST STREET
NEW YORK, NY 10282

Effective Date: 09/22/2008

Description: THE FIRM IS A WHOLLY OWNED SUBSIDIARY OF THE GOLDMAN SACHS GROUP, INC.

Disclosure Events for Non-Registered Control Affiliates



All firms registered to sell securities or provide investment advice are required to disclose regulatory actions, criminal or civil judicial proceedings, and certain financial matters in which the firm or one of its control affiliates has been involved. For your convenience, below is a matrix of the number and status of disclosure events involving this brokerage firm or one of its control affiliates. Further information regarding these events can be found in the subsequent pages of this report.

	Pending	Final	On Appeal
Regulatory Event	0	82	0
Criminal	0	4	0



Disclosure Event Details

Regulatory - Final

Disclosure 1 of 82

Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	ON JULY 2, 2025, BLOOMBERG SEF LLC ("BSEF") DETERMINED THAT GOLDMAN SACHS INTERNATIONAL ("GSI") VIOLATED BSEF RULE 516 BY FAILING TO CORRECT AN ERROR TRADE EXECUTED ON THE BSEF PLATFORM IN ACCORDANCE WITH THE REQUIREMENTS UNDER RULE 516. SPECIFICALLY, GSI UTILIZED BSEF TO CORRECT AN ERROR TRADE NOT ORIGINALLY EXECUTED ON BSEF.
Initiated By:	BLOOMBERG SEF LLC
Date Initiated:	07/02/2025
Docket/Case Number:	
Principal Product Type:	Other
Other Product Type(s):	SWAPS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	07/02/2025
Sanctions Ordered:	Monetary/Fine \$2,000.00
Other Sanctions Ordered:	
Sanction Details:	BSEF IMPOSED A FINE OF \$2,000.00, WHICH GSI PAID BY SUBMISSION OF A WIRE ON JULY 21, 2025.
Firm Statement	BSEF IMPOSED A FINE OF \$2,000.00, WHICH GSI PAID BY SUBMISSION OF A WIRE ON JULY 21, 2025.

Disclosure 2 of 82

Reporting Source:	Firm
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Affiliate:	J. ARON AND COMPANY LLC
Current Status:	Final
Allegations:	THE LONDON METAL EXCHANGE ("LME") ISSUED J. ARON AND COMPANY LLC ("JAR") WITH AN AUTOMATIC PENALTY RELATED TO ALLEGED ERRORS IN JAR'S COMMODITY POSITION REPORT ("CPR") SUBMISSIONS TO THE LME DURING FEBRUARY AND MARCH 2025.
Initiated By:	THE LONDON METAL EXCHANGE
Date Initiated:	04/01/2025
Docket/Case Number:	
Principal Product Type:	Futures - Commodity
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	04/01/2025
Sanctions Ordered:	Monetary/Fine \$19,430.05
Other Sanctions Ordered:	
Sanction Details:	UNDER THE LME'S AUTOMATIC PENALTY POLICY, THE FINE WAS SPLIT AS FOLLOWS: 5,000 POUNDS FOR THE FIRST INSTANCE IN FEBRUARY 2025, AND 10,000 POUNDS FOR THE SECOND IN MARCH 2025. ON APRIL 29, 2025, JAR PAID THE TOTAL FINE AMOUNT OF 15,000 POUNDS (EQUIVALENT TO \$19,430.05 USING THE FEDERAL RESERVE'S FOREIGN EXCHANGE RATE AS OF MARCH 31, 2025).
Firm Statement	UNDER THE LME'S AUTOMATIC PENALTY POLICY, THE FINE WAS SPLIT AS FOLLOWS: 5,000 POUNDS FOR THE FIRST INSTANCE IN FEBRUARY 2025, AND 10,000 POUNDS FOR THE SECOND IN MARCH 2025. ON APRIL 29, 2025, JAR PAID THE TOTAL FINE AMOUNT OF 15,000 POUNDS (EQUIVALENT TO \$19,430.05 USING THE FEDERAL RESERVE'S FOREIGN EXCHANGE RATE AS OF MARCH 31, 2025).

Disclosure 3 of 82

Reporting Source: Firm



Affiliate:	GOLDMAN SACHS BANK EUROPE SE
Current Status:	Final
Allegations:	THE FRANKFURT STOCK EXCHANGE (THE "EXCHANGE") ISSUED A FINE AGAINST GOLDMAN SACHS BANK EUROPE ("GSBE") WITH A PENALTY OF 500 EUROS FOR GSBE'S ALLEGED FAILURE TO REGISTER LONG CODES ASSOCIATED WITH SHORT CODES USED IN CERTAIN TRADING REPORTS, AS REQUIRED BY THE EXCHANGE'S RULES. THE PENALTY WAS BASED ON THE EXCHANGE IDENTIFYING 14 INSTANCES OF MISSING LONG CODES IN JANUARY 2024. THE EXCHANGE ALSO ORDERED GSBE TO PAY 1,000 EUROS TO COVER THE EXCHANGE'S COSTS OF THE PROCEEDINGS, BRINGING THE TOTAL PAYMENT TO 1,500 EUROS (APPROXIMATELY \$1,623.38).
Initiated By:	FRANKFURT STOCK EXCHANGE
Date Initiated:	04/01/2025
Docket/Case Number:	HM 23-2024
Principal Product Type:	Other
Other Product Type(s):	STRUCTURED PRODUCTS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	04/01/2025
Sanctions Ordered:	Monetary/Fine \$1,623.38
Other Sanctions Ordered:	
Sanction Details:	THE EXCHANGE ISSUED A FINE OF 500 EUROS AGAINST GSBE FOR ALLEGEDLY FAILING TO PROPERLY REPORT THE LONG CODES ASSOCIATED WITH SHORT CODES USED IN CERTAIN TRADING REPORTS, AS REQUIRED BY THE EXCHANGE'S RULES. THE EXCHANGE ALSO ORDERED GSBE TO PAY 1,000 EUROS TO COVER THE EXCHANGE'S COSTS OF THE PROCEEDINGS, BRINGING THE TOTAL PAYMENT AMOUNT TO 1,500 EUROS (EQUIVALENT TO \$1,623.38 USING THE FEDERAL RESERVE'S FOREIGN EXCHANGE RATE AS OF MARCH 31, 2025). GSBE IS ARRANGING FOR THE PAYMENT.
Firm Statement	THE EXCHANGE ISSUED A FINE OF 500 EUROS AGAINST GSBE FOR ALLEGEDLY FAILING TO PROPERLY REPORT THE LONG CODES ASSOCIATED WITH SHORT CODES USED IN CERTAIN TRADING REPORTS,



AS REQUIRED BY THE EXCHANGE'S RULES. THE EXCHANGE ALSO ORDERED GSBE TO PAY 1,000 EUROS TO COVER THE EXCHANGE'S COSTS OF THE PROCEEDINGS, BRINGING THE TOTAL PAYMENT AMOUNT TO 1,500 EUROS (EQUIVALENT TO \$1,623.38 USING THE FEDERAL RESERVE'S FOREIGN EXCHANGE RATE AS OF MARCH 31, 2025). GSBE IS ARRANGING FOR THE PAYMENT.

Disclosure 4 of 82

Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS BANK EUROPE SE
Current Status:	Final
Allegations:	THE FRANKFURT STOCK EXCHANGE (THE "EXCHANGE") ISSUED A FINE AGAINST GOLDMAN SACHS BANK EUROPE ("GSBE") WITH A PENALTY OF 500 EUROS FOR GSBE'S ALLEGED FAILURE TO REGISTER LONG CODES ASSOCIATED WITH SHORT CODES USED IN CERTAIN TRADING REPORTS, AS REQUIRED BY THE EXCHANGE'S RULES. THE PENALTY WAS BASED ON THE EXCHANGE IDENTIFYING 12 INSTANCES OF MISSING LONG CODES IN DECEMBER 2023. THE EXCHANGE ALSO ORDERED GSBE TO PAY 1,000 EUROS TO COVER THE EXCHANGE'S COSTS OF THE PROCEEDINGS, BRINGING THE TOTAL PAYMENT TO 1,500 EUROS (APPROXIMATELY \$1,623.38).
Initiated By:	FRANKFURT STOCK EXCHANGE
Date Initiated:	04/01/2025
Docket/Case Number:	HM 13-2024
Principal Product Type:	Other
Other Product Type(s):	STRUCTURED PRODUCTS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	04/01/2025
Sanctions Ordered:	Monetary/Fine \$1,623.38
Other Sanctions Ordered:	
Sanction Details:	THE EXCHANGE ISSUED A FINE OF 500 EUROS AGAINST GSBE FOR



ALLEGEDLY FAILING TO PROPERLY REPORT THE LONG CODES ASSOCIATED WITH SHORT CODES USED IN CERTAIN TRADING REPORTS, AS REQUIRED BY THE EXCHANGE'S RULES. THE EXCHANGE ALSO ORDERED GSBE TO PAY 1,000 EUROS TO COVER THE EXCHANGE'S COSTS OF THE PROCEEDINGS, BRINGING THE TOTAL PAYMENT AMOUNT TO 1,500 EUROS (EQUIVALENT TO \$1,623.38 USING THE FEDERAL RESERVE'S FOREIGN EXCHANGE RATE AS OF MARCH 31, 2025). GSBE IS ARRANGING FOR THE PAYMENT.

Firm Statement

THE EXCHANGE ISSUED A FINE OF 500 EUROS AGAINST GSBE FOR ALLEGEDLY FAILING TO PROPERLY REPORT THE LONG CODES ASSOCIATED WITH SHORT CODES USED IN CERTAIN TRADING REPORTS, AS REQUIRED BY THE EXCHANGE'S RULES. THE EXCHANGE ALSO ORDERED GSBE TO PAY 1,000 EUROS TO COVER THE EXCHANGE'S COSTS OF THE PROCEEDINGS, BRINGING THE TOTAL PAYMENT AMOUNT TO 1,500 EUROS (EQUIVALENT TO \$1,623.38 USING THE FEDERAL RESERVE'S FOREIGN EXCHANGE RATE AS OF MARCH 31, 2025). GSBE IS ARRANGING FOR THE PAYMENT.

Disclosure 5 of 82

Reporting Source:	Firm
Affiliate:	THE GOLDMAN SACHS GROUP, INC.
Current Status:	Final
Allegations:	ON SEPTEMBER 25, 2024, THE GOLDMAN SACHS GROUP, INC. ("GS GROUP") ENTERED INTO AN ORDER INSTITUTING CEASE-AND-DESIST PROCEEDINGS WITH THE U.S. SECURITIES AND EXCHANGE COMMISSION ("SEC"), WHICH ALLEGED GS GROUP AND RELEVANT GS GROUP AFFILIATES FAILED TO TIMELY FILE SECTION 16(A) REPORTS WITH RESPECT TO CERTAIN ISSUERS, INCLUDING LATE-REPORTED TRANSACTIONS EXECUTED FROM MARCH 2018 TO NOVEMBER 2021. WITHOUT ADMITTING OR DENYING THE FINDINGS, GS GROUP CONSENTED TO THE ENTRY OF THE SEC'S ORDER TO CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTION 16(A) OF THE SECURITIES EXCHANGE ACT OF 1934 AND RULE 16A-3 AND AGREED TO PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$300,000, WHICH GS GROUP PAID ON OCTOBER 15, 2024.
Initiated By:	U.S. SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	09/25/2024
Docket/Case Number:	FILE NO. 3-22185
Principal Product Type:	Equity Listed (Common & Preferred Stock)

**Other Product Type(s):**

Principal Sanction(s)/Relief Sought: Cease and Desist

Other Sanction(s)/Relief Sought:

Resolution: Order

Resolution Date: 09/25/2024

Sanctions Ordered: Monetary/Fine \$300,000.00
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, GS GROUP CONSENTED TO THE ENTRY OF THE SEC'S ORDER TO CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTION 16(A) OF THE SECURITIES EXCHANGE ACT OF 1934 AND RULE 16A-3 AND AGREED TO PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$300,000, WHICH GS GROUP PAID ON OCTOBER 15, 2024.

Firm Statement WITHOUT ADMITTING OR DENYING THE FINDINGS, GS GROUP CONSENTED TO THE ENTRY OF THE SEC'S ORDER TO CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTION 16(A) OF THE SECURITIES EXCHANGE ACT OF 1934 AND RULE 16A-3 AND AGREED TO PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$300,000, WHICH GS GROUP PAID ON OCTOBER 15, 2024.

Disclosure 6 of 82

Reporting Source: Firm

Affiliate: GOLDMAN SACHS INTERNATIONAL

Current Status: Final

Allegations: ON JUNE 29, 2022, A SUBCOMMITTEE OF THE ICE FUTURES U.S. BUSINESS CONDUCT COMMITTEE ("ICE") ALLEGED THAT GOLDMAN SACHS INTERNATIONAL ("GSI") MAY HAVE VIOLATED EXCHANGE RULES 4.04 AND 4.01(A) BETWEEN MAY 2020 AND JULY 2020 BY ENGAGING IN IMPROPER PRE-HEDGING AND NOT DILIGENTLY SUPERVISING THE ACTIVITIES OF ITS EMPLOYEES WITH REGARD TO ICE'S RULES ON PRE-HEDGING.

Initiated By: ICE FUTURES U.S.

Date Initiated: 06/29/2022

Docket/Case Number: 2020-033



Principal Product Type:	Futures - Financial
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	DISGORGEMENT
Resolution:	Settled
Resolution Date:	07/01/2022
Sanctions Ordered:	Monetary/Fine \$1,444,249.80 Disgorgement/Restitution
Other Sanctions Ordered:	
Sanction Details:	IN ACCORDANCE WITH THE TERMS OF SETTLEMENT, IN WHICH GSI NEITHER ADMITTED NOR DENIED THE ALLEGED RULE VIOLATIONS, GSI AGREED TO PAY A MONETARY PENALTY OF \$125,000 AND DISGORGE \$1,319,249.80 IN ALLEGED PROFITS, WHICH GSI PAID IN FULL ON JULY 1, 2022.
Firm Statement	IN ACCORDANCE WITH THE TERMS OF SETTLEMENT, IN WHICH GSI NEITHER ADMITTED NOR DENIED THE ALLEGED RULE VIOLATIONS, GSI AGREED TO PAY A MONETARY PENALTY OF \$125,000 AND DISGORGE \$1,319,249.80 IN ALLEGED PROFITS, WHICH GSI PAID IN FULL ON JULY 1, 2022.

Disclosure 7 of 82

Reporting Source:	Firm
Affiliate:	J. ARON & COMPANY LLC
Current Status:	Final
Allegations:	ON MAY 17, 2022, A PANEL OF THE COMMODITY EXCHANGE (COMEX) BUSINESS CONDUCT COMMITTEE FOUND THAT, ON SEVERAL OCCASIONS IN MAY 2020 AND JULY 2020, J. ARON & COMPANY LLC ("J. ARON"), PRIOR TO ENGAGING IN ANY PRE-HEDGING ACTIVITY, FAILED TO MAKE CLEAR TO ITS COUNTERPARTY THAT IT WAS TRADING PRINCIPALLY THEREBY VIOLATING COMEX RULE 526.
Initiated By:	CME GROUP INC.
Date Initiated:	05/17/2022
Docket/Case Number:	19-1158-BC



Principal Product Type:	Futures - Commodity
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	DISGORGEMENT
Resolution:	Settled
Resolution Date:	06/02/2022
Sanctions Ordered:	Monetary/Fine \$135,825.00 Disgorgement/Restitution
Other Sanctions Ordered:	
Sanction Details:	PURSUANT TO AN OFFER OF SETTLEMENT, IN WHICH J. ARON NEITHER ADMITTED NOR DENIED THE RULE VIOLATION UPON WHICH THE PENALTY IS BASED, J. ARON AGREED TO PAY A FINE IN THE AMOUNT OF \$125,000 AND TO DISGORGE PROFITS IN THE AMOUNT OF \$10,825. THE FINE WAS PAID IN FULL BY SUBMISSION OF A WIRE ON JUNE 2, 2022.
Firm Statement	PURSUANT TO AN OFFER OF SETTLEMENT, IN WHICH J. ARON NEITHER ADMITTED NOR DENIED THE RULE VIOLATION UPON WHICH THE PENALTY IS BASED, J. ARON AGREED TO PAY A FINE IN THE AMOUNT OF \$125,000 AND TO DISGORGE PROFITS IN THE AMOUNT OF \$10,825. THE FINE WAS PAID IN FULL BY SUBMISSION OF A WIRE ON JUNE 2, 2022.

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Reporting Source:	Firm
Affiliate:	GREENSKY, LLC
Current Status:	Final
Allegations:	ON JULY 12, 2021, THE CONSUMER FINANCIAL PROTECTION BUREAU ("CFPB") ENTERED A CONSENT ORDER AGAINST GREENSKY LLC ("GREENSKY") AFTER DETERMINING GREENSKY VIOLATED SECTIONS 1031(A) AND 1036(A)(1)(B) OF THE CONSUMER FINANCIAL PROTECTION ACT. FROM MARCH 2014 THROUGH JULY 2021, THE CFPB IDENTIFIED MULTIPLE INSTANCES OF GREENSKY ENGAGING IN UNFAIR ACTS AND PRACTICES WITH REGARD TO LOANS TO CONSUMERS WHO DID NOT AUTHORIZE THEM AND BY STRUCTURING ITS LOAN ORIGINATION AND SERVICING ACTIVITIES IN A MANNER THAT ENABLED UNAUTHORIZED LOANS.



Initiated By: CONSUMER FINANCIAL PROTECTION BUREAU

Date Initiated: 07/12/2021

Docket/Case Number: 2021-CFPB-0004

Principal Product Type: Other

Other Product Type(s): LOANS

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought:

Resolution: Order

Resolution Date: 07/12/2021

Sanctions Ordered: Monetary/Fine \$2,500,000.00
Disgorgement/Restitution

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING ANY OF THE FINDINGS OF FACT OR CONCLUSIONS, GREENSKY AGREED TO THE ISSUANCE OF THE CONSENT ORDER WHICH WILL TERMINATE FIVE YEARS AFTER THE EFFECTIVE DATE OF JULY 12, 2021, BARRING ANY FURTHER VIOLATIONS. GREENSKY IS TO PAY REDRESS TO CONSUMERS IDENTIFIED BY THE CONSENT ORDER AS BEING IMPACTED BY THE VIOLATIONS IN A TOTAL AMOUNT TO NOT BE LESS THAN \$750,000 AND TO NOT EXCEED \$3,000,000, AND LOAN CANCELLATIONS IN AN AMOUNT NO MORE THAN \$6,000,000. IN ADDITION, A CIVIL PENALTY OF \$2,500,000 WAS ORDERED TO BE PAID TO THE CFPB. GREENSKY WAS ORDERED TO IMPLEMENT ADDITIONAL COMPLIANCE MEASURES TO PREVENT FURTHER VIOLATIONS INCLUDING THE ESTABLISHMENT OF A COMPLIANCE COMMITTEE TO BE RESPONSIBLE FOR MONITORING AND COORDINATING GREENSKY'S ADHERENCE TO THE PROVISIONS OF THE CONSENT ORDER FOR THE EFFECTIVE TIME PERIOD.

Firm Statement WITHOUT ADMITTING OR DENYING ANY OF THE FINDINGS OF FACT OR CONCLUSIONS, GREENSKY AGREED TO THE ISSUANCE OF THE CONSENT ORDER WHICH WILL TERMINATE FIVE YEARS AFTER THE EFFECTIVE DATE OF JULY 12, 2021, BARRING ANY FURTHER VIOLATIONS. GREENSKY IS TO PAY REDRESS TO CONSUMERS IDENTIFIED BY THE CONSENT ORDER AS BEING IMPACTED BY THE VIOLATIONS IN A TOTAL AMOUNT TO NOT BE LESS THAN \$750,000 AND TO NOT EXCEED \$3,000,000, AND LOAN CANCELLATIONS IN AN AMOUNT NO MORE THAN \$6,000,000. IN ADDITION, A CIVIL PENALTY OF \$2,500,000 WAS ORDERED TO BE PAID TO THE CFPB. GREENSKY WAS ORDERED TO IMPLEMENT ADDITIONAL COMPLIANCE



MEASURES TO PREVENT FURTHER VIOLATIONS INCLUDING THE ESTABLISHMENT OF A COMPLIANCE COMMITTEE TO BE RESPONSIBLE FOR MONITORING AND COORDINATING GREENSKY'S ADHERENCE TO THE PROVISIONS OF THE CONSENT ORDER FOR THE EFFECTIVE TIME PERIOD.

Disclosure 9 of 82

Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INVESTMENTS (MAURITIUS) I LIMITED
Current Status:	Final
Allegations:	GOLDMAN SACHS INVESTMENTS (MAURITIUS) I LIMITED ("GSMI") SUBMITTED A SETTLEMENT PROPOSAL TO THE SECURITIES AND EXCHANGE BOARD OF INDIA ("SEBI") ON JULY 23, 2019 IN ORDER TO RESOLVE ALLEGATIONS OF DISCREPANCIES IN THE MONTHLY REPORTING OF OFFSHORE DERIVATIVE INSTRUMENTS IN DEFAULT OF REGULATION 22 OF THE SEBI REGULATIONS. THE SETTLEMENT ORDER WAS PASSED BY SEBI AND WENT INTO IMMEDIATE EFFECT ON SEPTEMBER 26, 2019.
Initiated By:	SECURITIES AND EXCHANGE BOARD OF INDIA (SEBI)
Date Initiated:	07/19/2019
Docket/Case Number:	SO/EFD-2/SD/305/SEP/2019
Principal Product Type:	Derivative(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	09/26/2019
Sanctions Ordered:	Monetary/Fine \$35,286.74
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING FAULT, GSMI AGREED TO A FINE IN THE AMOUNT OF RUPEES 2,535,000 (APPROXIMATELY USD 35,286.74), WHICH WAS PAID BY SUBMISSION OF A WIRE ON SEPTEMBER 5, 2019. THE SETTLEMENT ORDER WAS PASSED BY SEBI AND WENT INTO IMMEDIATE EFFECT ON SEPTEMBER 26, 2019.
Firm Statement	WITHOUT ADMITTING OR DENYING FAULT, GSMI AGREED TO A FINE IN THE



AMOUNT OF RUPEES 2,535,000 (APPROXIMATELY USD 35,286.74), WHICH WAS PAID BY SUBMISSION OF A WIRE ON SEPTEMBER 5, 2019. THE SETTLEMENT ORDER WAS PASSED BY SEBI AND WENT INTO IMMEDIATE EFFECT ON SEPTEMBER 26, 2019.

Disclosure 10 of 82

Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS (SINGAPORE) PTE.
Current Status:	Final
Allegations:	GOLDMAN SACHS (SINGAPORE) PTE. ("GSSP") SUBMITTED A SETTLEMENT PROPOSAL TO THE SECURITIES AND EXCHANGE BOARD OF INDIA ("SEBI") ON JULY 23, 2019 IN ORDER TO RESOLVE ALLEGATIONS OF DISCREPANCIES IN THE MONTHLY REPORTING OF OFFSHORE DERIVATIVE INSTRUMENTS IN DEFAULT OF REGULATION 22 OF THE SEBI REGULATIONS. THE SETTLEMENT ORDER WAS PASSED BY SEBI AND WENT INTO IMMEDIATE EFFECT ON SEPTEMBER 26, 2019.
Initiated By:	SECURITIES AND EXCHANGE BOARD OF INDIA (SEBI)
Date Initiated:	07/19/2019
Docket/Case Number:	SO/EFD-2/SD/304/SEP/2019
Principal Product Type:	Derivative(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	09/26/2019
Sanctions Ordered:	Monetary/Fine \$35,286.74
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING FAULT, GSSP AGREED TO A FINE IN THE AMOUNT OF RUPEES 2,535,000 (APPROXIMATELY USD 35,286.74), WHICH WAS PAID BY SUBMISSION OF A WIRE ON SEPTEMBER 5, 2019. THE SETTLEMENT ORDER WAS PASSED BY SEBI AND WENT INTO IMMEDIATE EFFECT ON SEPTEMBER 26, 2019.
Firm Statement	WITHOUT ADMITTING OR DENYING FAULT, GSSP AGREED TO A FINE IN THE



AMOUNT OF RUPEES 2,535,000 (APPROXIMATELY USD 35,286.74), WHICH WAS PAID BY SUBMISSION OF A WIRE ON SEPTEMBER 5, 2019. THE SETTLEMENT ORDER WAS PASSED BY SEBI AND WENT INTO IMMEDIATE EFFECT ON SEPTEMBER 26, 2019.

Disclosure 11 of 82

Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS BANK EUROPE SE
Current Status:	Final
Allegations:	THE FEDERAL FINANCIAL SUPERVISORY AUTHORITY OF GERMANY ("BAFIN") CONDUCTED A SPECIAL AUDIT, PURSUANT TO SECTION 51, GELDWÄSCHEGESETZ - MONEY LAUNDERING ACT, AND SUBSEQUENTLY ISSUED AN ORDER AGAINST GOLDMAN SACHS BANK EUROPE SE ("GSBE") ON DECEMBER 18, 2020. THE ORDER REQUIRED REMEDIATION OF ALL DISCREPANCIES IDENTIFIED IN THE SPECIAL AUDIT.
Initiated By:	BAFIN - THE FEDERAL FINANCIAL SUPERVISORY AUTHORITY OF GERMANY
Date Initiated:	12/18/2020
Docket/Case Number:	GW 5-K 5112-100395-2020/0001
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	ORDER
Resolution:	Order
Resolution Date:	05/14/2021
Sanctions Ordered:	Monetary/Fine \$478.09
Other Sanctions Ordered:	
Sanction Details:	ON DECEMBER 18, 2020, BAFIN ORDERED GSBE TO REMEDIATE ALL DISCREPANCIES IDENTIFIED IN THE SPECIAL AUDIT AND TO BEAR THE COSTS OF THE PROCEEDING RESULTING IN AN ADMINISTRATIVE FEE OF EUR 585 (APPROXIMATELY USD 478.09). THE FIRM ADDRESSED ALL REMEDIATIONS REQUIRED IN THE ORDER BY APRIL 28, 2021 AND NOTIFIED BAFIN OF THE STEPS TAKEN DURING THE REMEDIATION PROCESS ON MAY 14, 2021.

**Firm Statement**

ON DECEMBER 18, 2020, BAFIN ORDERED GSBE TO REMEDIATE ALL DISCREPANCIES IDENTIFIED IN THE SPECIAL AUDIT AND TO BEAR THE COSTS OF THE PROCEEDING RESULTING IN AN ADMINISTRATIVE FEE OF EUR 585 (APPROXIMATELY USD 478.09). THE FIRM ADDRESSED ALL REMEDIATIONS REQUIRED IN THE ORDER BY APRIL 28, 2021 AND NOTIFIED BAFIN OF THE STEPS TAKEN DURING THE REMEDIATION PROCESS ON MAY 14, 2021.

Disclosure 12 of 82

Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	ON JUNE 16, 2021, THE SWISS FEDERAL DEPARTMENT OF FINANCE CONCLUDED THEIR ADMINISTRATIVE CRIMINAL INVESTIGATION AND DETERMINED THAT GOLDMAN SACHS INTERNATIONAL ("GSI") VIOLATED THE DISCLOSURE REQUIREMENTS OF ARTICLE 151 AND ARTICLE 134 OF THE FINANCIAL MARKET INFRASTRUCTURES ACT, BY SUBMITTING LATE NOTICES FOR TWELVE TRANSACTIONS EXECUTED DURING AN ONGOING TENDER OFFER OF A SWISS ISSUER.
Initiated By:	SWISS FEDERAL DEPARTMENT OF FINANCE
Date Initiated:	06/16/2021
Docket/Case Number:	442 2-629
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	11/10/2021
Sanctions Ordered:	Monetary/Fine \$3,997.76
Other Sanctions Ordered:	
Sanction Details:	THE SWISS FEDERAL DEPARTMENT OF FINANCE ISSUED A FINE OF CHF 3640 (APPROXIMATELY USD 3997.76) WHICH WAS PAID BY A SUBMISSION OF A WIRE ON NOVEMBER 10, 2021.

**Firm Statement**

THE SWISS FEDERAL DEPARTMENT OF FINANCE ISSUED A FINE OF CHF 3640 (APPROXIMATELY USD 3997.76) WHICH WAS PAID BY A SUBMISSION OF A WIRE ON NOVEMBER 10, 2021.

Disclosure 13 of 82

Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS DO BRASIL BANCO MULTIPLO S.A.
Current Status:	Final
Allegations:	GOLDMAN SACHS DO BRASIL BANCO MULTIPLO S.A. ("GS BRAZIL"), GOLDMAN SACHS INTERNATIONAL ("GSI"), AND DANIEL MOTTA CAMARGO SILVA, A DIRECTOR OF THE TRADING DESK (FICC) OF GS BRAZIL, SUBMITTED A SETTLEMENT PROPOSAL THAT WAS ACCEPTED BY THE COMISSAO DE VALORES MOBILIARIOS ("CVM") BOARD OF COMMISSIONERS. THE SETTLEMENT RESOLVED ALLEGATIONS THAT BETWEEN JANUARY 1, 2018 AND DECEMBER 31, 2019, GSI AND GS BRAZIL CREATED ARTIFICIAL CONDITIONS OF DEMAND, OFFER, OR PRICE BY CROSSING IN THE BRAZILIAN EXCHANGE DI X US DOLLAR SPREAD FUTURES IN VIOLATION OF CVM INSTRUCTION N. 08/79.
Initiated By:	COMISSAO DE VALORES MOBILIARIOS (CVM)
Date Initiated:	06/01/2021
Docket/Case Number:	19957.000791/2020-59
Principal Product Type:	Futures - Financial
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	07/22/2021
Sanctions Ordered:	Monetary/Fine \$1,454,941.55
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, GS BRAZIL, GSI, AND MR. SILVA ENTERED INTO A SETTLEMENT AGREEMENT ON JULY 22, 2021 WITH THE CVM FOR A TOTAL AMOUNT OF BRAZILIAN REAIS 7,480,000 (APPROXIMATELY USD 1,454,941.55), WHICH WAS PAID BY A WIRE



SUBMISSION ON AUGUST 5, 2021.

Firm Statement

WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, GS BRAZIL, GSI, AND MR. SILVA ENTERED INTO A SETTLEMENT AGREEMENT ON JULY 22, 2021 WITH THE CVM FOR A TOTAL AMOUNT OF BRAZILIAN REAIS 7,480,000 (APPROXIMATELY USD 1,454,941.55), WHICH WAS PAID BY A WIRE SUBMISSION ON AUGUST 5, 2021.

Reporting Source:

Firm

Affiliate:

GOLDMAN SACHS INTERNATIONAL

Current Status:

Final

Allegations:

GOLDMAN SACHS DO BRASIL BANCO MULTIPLO S.A. ("GS BRAZIL"), GOLDMAN SACHS INTERNATIONAL ("GSI"), AND DANIEL MOTTA CAMARGO SILVA, A DIRECTOR OF THE TRADING DESK (FICC) OF GS BRAZIL, SUBMITTED A SETTLEMENT PROPOSAL THAT WAS ACCEPTED BY THE COMISSAO DE VALORES MOBILIARIOS ("CVM") BOARD OF COMMISSIONERS. THE SETTLEMENT RESOLVED ALLEGATIONS THAT BETWEEN JANUARY 1, 2018 AND DECEMBER 31, 2019, GSI AND GS BRAZIL CREATED ARTIFICIAL CONDITIONS OF DEMAND, OFFER, OR PRICE BY CROSSING IN THE BRAZILIAN EXCHANGE DI X US DOLLAR SPREAD FUTURES IN VIOLATION OF CVM INSTRUCTION N. 08/79.

Initiated By:

COMISSAO DE VALORES MOBILIARIOS (CVM)

Date Initiated:

06/01/2021

Docket/Case Number:

19957.000791/2020-59

Principal Product Type:

Futures - Financial

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution:

Settled

Resolution Date:

07/22/2021

Sanctions Ordered:

Monetary/Fine \$1,454,941.55

Other Sanctions Ordered:

Sanction Details:

WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, GS BRAZIL, GSI, AND MR. SILVA ENTERED INTO A SETTLEMENT AGREEMENT ON JULY 22,



2021 WITH THE CVM FOR A TOTAL AMOUNT OF BRAZILIAN REAIS 7,480,000 (APPROXIMATELY USD 1,454,941.55), WHICH WAS PAID BY A WIRE SUBMISSION ON AUGUST 5, 2021.

Firm Statement

WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, GS BRAZIL, GSI, AND MR. SILVA ENTERED INTO A SETTLEMENT AGREEMENT ON JULY 22, 2021 WITH THE CVM FOR A TOTAL AMOUNT OF BRAZILIAN REAIS 7,480,000 (APPROXIMATELY USD 1,454,941.55), WHICH WAS PAID BY A WIRE SUBMISSION ON AUGUST 5, 2021.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	EUREX DEUTSCHLAND INITIATED SANCTION PROCEEDINGS AGAINST GOLDMAN SACHS INTERNATIONAL ("GSI") AND A GSI SALES TRADER ON APRIL 20, 2021 IN RELATION TO FOUR REQUESTS FOR CROSS IN THE EUREX PRODUCT ADIDAS DEC23 WITHOUT SUBSEQUENT ENTRY OR A CORRESPONDING TRADE OR ORDER. EUREX DEUTSCHLAND ALLEGES THAT SUBMISSION OF THE CROSS REQUESTS WAS IN VIOLATION OF NUMBER 2.6 OF THE EXCHANGE RULES OF EUREX DEUTSCHLAND.
Initiated By:	EUREX DEUTSCHLAND
Date Initiated:	04/20/2021
Docket/Case Number:	2021/10
Principal Product Type:	Futures - Financial
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	08/18/2021
Sanctions Ordered:	Monetary/Fine \$854.55
Other Sanctions Ordered:	
Sanction Details:	EUREX DEUTSCHLAND INITIATED SANCTION PROCEEDINGS AGAINST GOLDMAN SACHS INTERNATIONAL ("GSI") ON APRIL 20, 2021 AND ISSUED A



SUMMARY FINE OF EURO 1,000 (APPROXIMATELY USD 854.55) TO GSI, WHICH WAS PAID BY SUBMISSION OF A WIRE ON AUGUST 18, 2021.

Firm Statement

EUREX DEUTSCHLAND INITIATED SANCTION PROCEEDINGS AGAINST GOLDMAN SACHS INTERNATIONAL ("GSI") ON APRIL 20, 2021 AND ISSUED A SUMMARY FINE OF EURO 1,000 (APPROXIMATELY USD 854.55) TO GSI, WHICH WAS PAID BY SUBMISSION OF A WIRE ON AUGUST 18, 2021.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	ON APRIL 5, 2021, ICE CLEAR CREDIT LLC ALLEGED THAT DURING MARCH 2021, IN ONE INSTANCE, GOLDMAN SACHS INTERNATIONAL ("GSI") VIOLATED ICE CLEAR CREDIT RULE 404(B), BY FAILING TO SUBMIT EIGHTY-ONE SINGLE NAME PRICES ON A TIMELY BASIS.
Initiated By:	ICE CLEAR CREDIT LLC
Date Initiated:	04/05/2021
Docket/Case Number:	2021-404B-005
Principal Product Type:	Derivative(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	04/05/2021
Sanctions Ordered:	Monetary/Fine \$40,000.00
Other Sanctions Ordered:	
Sanction Details:	ICE CLEAR CREDIT LLC IMPOSED A FINE OF \$40,000, WHICH GSI PAID BY INVOICE IN JUNE 2021.
Firm Statement	ICE CLEAR CREDIT LLC IMPOSED A FINE OF \$40,000, WHICH GSI PAID BY INVOICE IN JUNE 2021.



Disclosure 16 of 82

Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	ON MARCH 18, 2021, THE SWISS FEDERAL DEPARTMENT OF FINANCE DETERMINED THAT GOLDMAN SACHS INTERNATIONAL ("GSI") VIOLATED THE DISCLOSURE REQUIREMENTS OF ARTICLE 151 AND ARTICLE 120 OF THE FINANCIAL MARKET INFRASTRUCTURES ACT, BY NEGLIGENTLY NOT REPORTING THE CONSOLIDATED POSITION FOR GOLDMAN SACHS IN CASTLE PRIVATE EQUITY LTD, A SWISS COMPANY LISTED ON THE SWISS STOCK EXCHANGE, WITHIN THE TIME LIMIT REQUIRED.
Initiated By:	SWISS FEDERAL DEPARTMENT OF FINANCE
Date Initiated:	03/18/2021
Docket/Case Number:	442.2-591
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	05/21/2021
Sanctions Ordered:	Monetary/Fine \$1,735.84
Other Sanctions Ordered:	
Sanction Details:	ON MARCH 18, 2021, THE SWISS FEDERAL DEPARTMENT OF FINANCE IMPOSED A VIOLATION PENALTY OF CHF 1500 (PLUS ADMINISTRATIVE COST OF CHF 60) AGAINST GSI. GSI PAID THE FINE OF CHF 1560 (APPROXIMATELY USD 1735.84) ON MAY 21, 2021 BY SUBMISSION OF A WIRE.
Firm Statement	ON MARCH 18, 2021, THE SWISS FEDERAL DEPARTMENT OF FINANCE IMPOSED A VIOLATION PENALTY OF CHF 1500 (PLUS ADMINISTRATIVE COST OF CHF 60) AGAINST GSI. GSI PAID THE FINE OF CHF 1560 (APPROXIMATELY USD 1735.84) ON MAY 21, 2021 BY SUBMISSION OF A WIRE.



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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	AKK - ÁLLAMADÓSSÁG KEZELO KÖZPONT ZÁRTKÖRÜEN MUKÖDO RÉSZVÉNYTÁRSASÁG ALLEGED THAT DURING THE MONTH OF SEPTEMBER 2020, GOLDMAN SACHS INTERNATIONAL ("GSI") FAILED TO MEET ITS PRIMARY DEALER QUOTING OBLIGATIONS IN ACCORDANCE WITH THE AGENCY CONTRACT BETWEEN GSI AND AKK AND THE RELEVANT MARKET MAKING RULES.
Initiated By:	AKK - ÁLLAMADÓSSÁG KEZELO KÖZPONT ZÁRTKÖRÜEN MUKÖDO RÉSZVÉNYTÁRSASÁG
Date Initiated:	10/09/2020
Docket/Case Number:	
Principal Product Type:	Debt - Government
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	10/27/2020
Sanctions Ordered:	Monetary/Fine \$1,614.50
Other Sanctions Ordered:	
Sanction Details:	AKK - ÁLLAMADÓSSÁG KEZELO KÖZPONT ZÁRTKÖRÜEN MUKÖDO RÉSZVÉNYTÁRSASÁG ALLEGED THAT DURING THE MONTH OF SEPTEMBER 2020, GOLDMAN SACHS INTERNATIONAL ("GSI") FAILED TO MEET ITS PRIMARY DEALER QUOTING OBLIGATIONS IN ACCORDANCE WITH THE AGENCY CONTRACT BETWEEN GSI AND AKK AND THE RELEVANT MARKET MAKING RULES.
Firm Statement	THE AKK IMPOSED A FINE ON GSI IN THE AMOUNT OF HUF 500,000, WHICH WAS PAID BY SUBMISSION OF A WIRE ON OCTOBER 27, 2020.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	AKK - ÁLLAMADÓSSÁG KEZELO KÖZPONT ZÁRTKÖRÜEN MUKÖDO RÉSZVÉNYTÁRSASÁG ALLEGED THAT DURING THE MONTH OF SEPTEMBER 2020, GOLDMAN SACHS INTERNATIONAL ("GSI") FAILED TO MEET ITS PRIMARY DEALER QUOTING OBLIGATIONS IN ACCORDANCE WITH THE AGENCY CONTRACT BETWEEN GSI AND AKK AND THE RELEVANT MARKET MAKING RULES.
Initiated By:	AKK - ÁLLAMADÓSSÁG KEZELO KÖZPONT ZÁRTKÖRÜEN MUKÖDO RÉSZVÉNYTÁRSASÁG
Date Initiated:	10/09/2020
Docket/Case Number:	
Principal Product Type:	Debt - Government
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	10/27/2020
Sanctions Ordered:	Monetary/Fine \$1,614.50
Other Sanctions Ordered:	
Sanction Details:	AKK - ÁLLAMADÓSSÁG KEZELO KÖZPONT ZÁRTKÖRÜEN MUKÖDO RÉSZVÉNYTÁRSASÁG ALLEGED THAT DURING THE MONTH OF SEPTEMBER 2020, GOLDMAN SACHS INTERNATIONAL ("GSI") FAILED TO MEET ITS PRIMARY DEALER QUOTING OBLIGATIONS IN ACCORDANCE WITH THE AGENCY CONTRACT BETWEEN GSI AND AKK AND THE RELEVANT MARKET MAKING RULES.
Firm Statement	THE AKK IMPOSED A FINE ON GSI IN THE AMOUNT OF HUF 500,000, WHICH WAS PAID BY SUBMISSION OF A WIRE ON OCTOBER 27, 2020.

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Reporting Source: Firm



Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	ON NOVEMBER 11, 2020, BLOOMBERG SEF LLC ("BSEF") NOTIFIED GOLDMAN SACHS INTERNATIONAL ("GSI") THAT IT HAD COMPLETED ITS INQUIRY AND CONCLUDED THAT GSI VIOLATED BSEF RULE 531.A(D) BY SUBMITTING BLOCK TRADES TO BSEF MORE THAN 10 MINUTES AFTER THE TIME THE PARTICIPANTS AGREED TO THE TERMS OF THE BLOCK TRADES. AS THIS WAS GSI'S SECOND SUCH VIOLATION WITHIN A 12-MONTH PERIOD, BSEF IMPOSED A FINE OF \$1,250.
Initiated By:	BLOOMBERG SEF LLC
Date Initiated:	11/11/2020
Docket/Case Number:	
Principal Product Type:	Other
Other Product Type(s):	SWAPS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	12/21/2020
Sanctions Ordered:	Monetary/Fine \$1,250.00
Other Sanctions Ordered:	
Sanction Details:	THE FINE IMPOSED BY BSEF WAS IN THE AMOUNT OF \$1,250, WHICH WAS PAID IN FULL BY GSI BY WIRE ON DECEMBER 21, 2020.
Firm Statement	THE FINE IMPOSED BY BSEF WAS IN THE AMOUNT OF \$1,250, WHICH WAS PAID IN FULL BY GSI BY WIRE ON DECEMBER 21, 2020.

Disclosure 20 of 82

Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS (ASIA) L.L.C.
Current Status:	Final
Allegations:	THE HONG KONG SECURITIES AND FUTURES COMMISSION ("HKSF") ISSUED A STATEMENT OF DISCIPLINARY ACTION (THE "SFC STATEMENT")



AGAINST GOLDMAN SACHS (ASIA) L.L.C. ("GS ASIA"), AN INDIRECT WHOLLY OWNED SUBSIDIARY OF THE GOLDMAN SACHS GROUP, INC., ON OCTOBER 22, 2020, RELATING TO GS ASIA'S FAILURE TO PROPERLY EXAMINE AND ADDRESS RED FLAGS IN CONNECTION WITH THE 1MALAYSIA DEVELOPMENT BERHAD ("1MDB") TRANSACTIONS AND TO DILIGENTLY SUPERVISE ITS SENIOR PERSONNEL IN CONNECTION WITH THEIR PARTICIPATION IN THE 1MDB TRANSACTIONS.

Initiated By: HONG KONG SECURITIES AND FUTURES COMMISSION

Date Initiated: 10/22/2020

Docket/Case Number:

Principal Product Type: Debt - Corporate

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution: Order

Resolution Date: 10/22/2020

Sanctions Ordered: Monetary/Fine \$350,000,000.00

Other Sanctions Ordered:

Sanction Details: PURSUANT TO THE SFC STATEMENT, THE HKSFC IMPOSED ON GS ASIA A FINANCIAL PENALTY IN THE AMOUNT OF \$350,000,000.

Firm Statement GS ASIA PAID A FINANCIAL PENALTY IN THE AMOUNT OF \$350,000,000 IN CONNECTION WITH THE SFC STATEMENT.

Disclosure 21 of 82

Reporting Source: Firm

Affiliate: GOLDMAN SACHS (SINGAPORE) PTE

Current Status: Final

Allegations: ON OCTOBER 22, 2020, GOLDMAN SACHS (SINGAPORE) PTE ("GS SINGAPORE") RECEIVED A LETTER OF DIRECTION FROM THE MONETARY AUTHORITY OF SINGAPORE (THE "MAS LETTER"), REQUIRING GS SINGAPORE TO APPOINT AN INDEPENDENT AUDITOR TO REVIEW THE EFFECTIVENESS AND SUSTAINABILITY OF THE REMEDIAL MEASURES



IMPLEMENTED BY GS SINGAPORE FOLLOWING THE MONETARY AUTHORITY OF SINGAPORE'S INSPECTION.

Initiated By: MONETARY AUTHORITY OF SINGAPORE

Date Initiated: 10/22/2020

Docket/Case Number: 6422 5358

Principal Product Type: Debt - Corporate

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: LETTER OF DIRECTION

Resolution: Order

Resolution Date: 10/22/2020

Firm Statement THE MSA LETTER REQUIRES GS SINGAPORE TO APPOINT AN INDEPENDENT AUDITOR TO REVIEW THE EFFECTIVENESS AND SUSTAINABILITY OF THE REMEDIAL MEASURES IMPLEMENTED BY GS SINGAPORE FOLLOWING THE MONETARY AUTHORITY OF SINGAPORE'S INSPECTION.

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Reporting Source: Firm

Affiliate: GOLDMAN SACHS (SINGAPORE) PTE

Current Status: Final

Allegations: ON OCTOBER 22, 2020, GOLDMAN SACHS (SINGAPORE) PTE ("GS SINGAPORE") RECEIVED A NOTICE OF CONDITIONAL WARNING FROM THE SINGAPORE COMMERCIAL AFFAIRS DEPARTMENT ("SCAD"), AT THE DIRECTION OF THE SINGAPORE ATTORNEY GENERAL'S CHAMBERS (THE "SINGAPORE NOTICE"), WHICH ALLEGED GS SINGAPORE CORRUPTLY GAVE GRATIFICATION AS A REWARD IN RELATION TO EACH OF THE 1MALAYSIA DEVELOPMENT BERHAD BOND TRANSACTIONS.

Initiated By: SINGAPORE COMMERCIAL AFFAIRS DEPARTMENT

Date Initiated: 10/22/2020

Docket/Case Number: HHQ/DOW/TCK/308392/7

Principal Product Type: Debt - Corporate



Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	DISGORGEMENT
Resolution:	Order
Resolution Date:	10/22/2020
Sanctions Ordered:	Monetary/Fine \$122,000,000.00 Disgorgement/Restitution
Other Sanctions Ordered:	
Sanction Details:	PURSUANT TO THE SINGAPORE NOTICE, THE SCAD, AT THE DIRECTION OF THE SINGAPORE ATTORNEY GENERAL'S CHAMBERS, ORDERED GS SINGAPORE TO PAY A FINANCIAL PENALTY IN THE AMOUNT OF \$122,000,000.
Firm Statement	GS SINGAPORE PAID A FINANCIAL PENALTY IN THE AMOUNT OF \$122,000,000 IN CONNECTION WITH THE SINGAPORE NOTICE.

Disclosure 23 of 82

Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	GOLDMAN SACHS INTERNATIONAL ("GSI"), AN INDIRECT WHOLLY OWNED SUBSIDIARY OF THE GOLDMAN SACHS GROUP, INC., RECEIVED ON OCTOBER 22, 2020 A WARNING NOTICE FROM THE UK FINANCIAL CONDUCT AUTHORITY (THE "FCA" AND THE NOTICE, THE "FCA NOTICE"), WHICH CITES GSI'S FAILURE TO (I) ASSESS AND MANAGE THE RISKS ASSOCIATED WITH THE 1MALAYSIA DEVELOPMENT BERHAD TRANSACTIONS; (II) PROPERLY RECORD HOW GSI COMMITTEES ASSESSED AND MANAGED THOSE RISKS AND; (III) RESPOND APPROPRIATELY TO ALLEGATIONS OF BRIBERY AND MISCONDUCT.
Initiated By:	FINANCIAL CONDUCT AUTHORITY
Date Initiated:	10/22/2020
Docket/Case Number:	142888
Principal Product Type:	Debt - Corporate



Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	10/22/2020
Sanctions Ordered:	Monetary/Fine \$63,000,000.00
Other Sanctions Ordered:	
Sanction Details:	PURSUANT TO THE FCA NOTICE, THE FCA IMPOSED ON GSI A FINANCIAL PENALTY IN THE AMOUNT OF \$63,000,000.
Firm Statement	GSI PAID A FINANCIAL PENALTY IN THE AMOUNT OF \$63,000,000 IN CONNECTION WITH THE FCA NOTICE.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	GOLDMAN SACHS INTERNATIONAL ("GSI"), AN INDIRECT WHOLLY OWNED SUBSIDIARY OF THE GOLDMAN SACHS GROUP, INC., RECEIVED ON OCTOBER 22, 2020 A WARNING NOTICE FROM THE BANK OF ENGLAND PRUDENTIAL REGULATION AUTHORITY (THE "PRA" AND THE WARNING NOTICE, THE "PRA NOTICE"), WHICH CITES GSI'S FAILURE TO (I) ASSESS AND MANAGE THE RISKS ASSOCIATED WITH THE 1MALAYSIA DEVELOPMENT BERHAD TRANSACTIONS; (II) PROPERLY RECORD HOW GSI COMMITTEES ASSESSED AND MANAGED THOSE RISKS; AND (III) RESPOND APPROPRIATELY TO ALLEGATIONS OF BRIBERY AND MISCONDUCT.
Initiated By:	BANK OF ENGLAND PRUDENTIAL REGULATION AUTHORITY
Date Initiated:	10/22/2020
Docket/Case Number:	142888
Principal Product Type:	Debt - Corporate
Other Product Type(s):	



Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	10/22/2020
Sanctions Ordered:	Monetary/Fine \$63,000,000.00
Other Sanctions Ordered:	
Sanction Details:	PURSUANT TO THE PRA NOTICE, THE PRA IMPOSED ON GSI A FINANCIAL PENALTY IN THE AMOUNT OF \$63,000,000.
Firm Statement	GSI PAID A FINANCIAL PENALTY IN THE AMOUNT OF \$63,000,000 IN CONNECTION WITH THE PRA NOTICE.

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Reporting Source:	Firm
Affiliate:	THE GOLDMAN SACHS GROUP, INC.
Current Status:	Final
Allegations:	ON OCTOBER 22, 2020, THE GOLDMAN SACHS GROUP, INC. ("GS GROUP") ENTERED INTO AN ORDER INSTITUTING CEASE AND DESIST PROCEEDINGS WITH THE SECURITIES AND EXCHANGE COMMISSION (THE "SEC" AND THE ORDER, THE "SEC ORDER"), WHICH ALLEGED GS GROUP FAILED TO REASONABLY MAINTAIN A SUFFICIENT SYSTEM OF INTERNAL ACCOUNTING CONTROLS BETWEEN 2012 AND 2015 WITH RESPECT TO THE PROCESS BY WHICH IT REVIEWED AND APPROVED THE COMMITMENT OF FIRM CAPITAL IN LARGE, SIGNIFICANT AND COMPLEX TRANSITIONS, SUCH AS THE 1MALAYSIA DEVELOPMENT BERHAD ("1MDB") OFFERINGS, AND THAT DOCUMENTATION PREPARED IN CONNECTION WITH THE 1MDB TRANSACTIONS DID NOT ACCURATELY REFLECT CERTAIN ASPECTS OF THE BOND OFFERINGS, INCLUDING THE INVOLVEMENT OF A THIRD PARTY INTERMEDIARY IN THE OFFERINGS.
Initiated By:	THE SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	10/22/2020
Docket/Case Number:	3-20132
Principal Product Type:	Debt - Corporate
Other Product Type(s):	



Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	CIVIL AND ADMINISTRATIVE PENALTY(IES)/FINE(S) DISGORGEMENT
Resolution:	Order
Resolution Date:	10/22/2020
Sanctions Ordered:	Monetary/Fine \$400,000,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	PURSUANT TO THE SEC ORDER, THE SEC REQUIRED GS GROUP (I) TO PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$400,000,000 AND (II) TO PAY DISGORGEMENT OF \$606,300,000, WITH DOLLAR-FOR-DOLLAR DISGORGEMENT CREDIT O THAT AMOUNT BASED ON THE U.S. DOLLAR VALUE OF SIMILAR PAYMENTS MADE TO THE GOVERNMENT OF MALAYSIA AND 1MDB PURSUANT TO THE PARALLEL SETTLEMENT AGREEMENT ENTERED INTO BY GS GROUP ON AUGUST 18, 2020 (THE "SETTLEMENT AGREEMENT").
Firm Statement	GS GROUP PAID A CIVIL MONEY PENALTY IN THE AMOUNT OF \$400,000,000 TO THE SEC AND DISGORGEMENT OF \$606,300,000, WITH DOLLAR-FOR-DOLLAR DISGORGEMENT CREDIT UP TO THAT AMOUNT BASED ON THE U.S. DOLLAR VALUE OF SIMILAR PAYMENTS MADE PURSUANT TO THE SETTLEMENT AGREEMENT.

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Reporting Source:	Firm
Affiliate:	THE GOLDMAN SACHS GROUP, INC.
Current Status:	Final
Allegations:	ON OCTOBER 22, 2020, THE GOLDMAN SACHS GROUP, INC. ("GS GROUP") ENTERED INTO AN ORDER TO CEASE AND DESIST AND ORDER OF ASSESSMENT OF A CIVIL MONEY PENALTY WITH THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM (THE "FEDERAL RESERVE", AND THE ORDER, THE "FEDERAL RESERVE ORDER"), WHICH ALLEGED GS GROUP ENGAGED IN UNSAFE AND UNSOUND BANKING PRACTICES RELATING TO THE 1MALAYSIA DEVELOPMENT BERHAD ("1MDB") BOND TRANSACTIONS THAT RESULTED FROM DEFICIENT POLICIES, PROCEDURES AND CONTROLS. SUCH DEFICIENCIES INCLUDED (I) THE LACK OF, OR FAILURE TO IMPLEMENT, ADEQUATE COMPLIANCE



POLICIES AND PROCEDURES TO ENSURE THE 1MDB OFFERINGS COMPLIED WITH SAFE AND SOUND PRACTICES; (II) THE FAILURE OF THE REVIEW AND APPROVAL PROCESS TO APPRECIATE THE SIGNIFICANT RISKS ASSOCIATED WITH THE 1MDB OFFERINGS; (III) THE FAILURE OF GS GROUP CONTROL FUNCTIONS AND SENIOR PERSONNEL TO ADDRESS RED FLAGS, INSIST ON ADEQUATE INFORMATION AND DOCUMENTATION REGARDING KEY ASPECTS OF THE OFFERINGS PRIOR TO EXECUTION, AND EFFECTIVELY SUPERVISE A SENIOR BUSINESS EMPLOYEE ABOUT WHOM CERTAIN GS GROUP PERSONNEL HAD EXPRESSED INTEGRITY CONCERNS IN THE PAST; AND (IV) THE FAILURE TO ESCALATE OR ADDRESS ALLEGATIONS OF BRIBERY COMMUNICATED TO CERTAIN SENIOR BUSINESS PERSONNEL.

Initiated By: BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM

Date Initiated: 10/22/2020

Docket/Case Number: 20-018-B-HC; 20-018-CMP-HC

Principal Product Type: Debt - Corporate

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Cease and Desist

Other Sanction(s)/Relief Sought: CIVIL AND ADMINISTRATIVE PENALTY(IES)/FINE(S)

Resolution: Order

Resolution Date: 10/22/2020

Sanctions Ordered: Monetary/Fine \$154,000,000.00
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: PURSUANT TO THE FEDERAL RESERVE ORDER, THE FEDERAL RESERVE ORDERED GS GROUP TO PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$154,000,000.

Firm Statement IN ADDITION TO PAYMENT OF THE CIVIL MONEY PENALTY, THE FEDERAL RESERVE ORDER REQUIRES THAT GS GROUP TAKE CERTAIN AFFIRMATIVE ACTIONS, INCLUDING SUBMITTING TO THE FEDERAL RESERVE (I) A WRITTEN PLAN TO ENHANCE, AND MAINTAIN IMPROVEMENTS TO, OVERSIGHT OF THE REVIEW AND APPROVAL OF CERTAIN SIGNIFICANT AND COMPLEX TRANSACTIONS; (II) A WRITTEN PLAN TO ENHANCE ITS EXISTING ANTI-BRIBERY COMPLIANCE PROGRAM FOR SUCH TRANSACTIONS; AND (III) A WRITTEN ENHANCED DUE DILIGENCE PROGRAM FOR SUCH TRANSACTIONS, IN EACH CASE EACH



ACCEPTABLE TO THE FEDERAL RESERVE.

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Reporting Source:	Firm
Affiliate:	THE GOLDMAN SACHS GROUP, INC.
Current Status:	Final
Allegations:	<p>ON OCTOBER 22, 2020, THE GOLDMAN SACHS GROUP, INC. ("GS GROUP") ENTERED INTO A CONSENT ORDER FOR A CIVIL MONEY PENALTY WITH THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES (THE "DFS", AND THE CONSENT ORDER, THE "DFS ORDER"), WHICH ALLEGED VIOLATIONS OF THE NEW YORK BANKING LAW ("BANKING LAW") ARISING OUT OF INVESTMENTS BY A GS GROUP WHOLLY-OWNED SUBSIDIARY, GOLDMAN SACHS BANK USA ("GS BANK"), IN INSTRUMENTS RELATED TO 1MALAYSIA DEVELOPMENT BERHAD ("1MDB"). THE CONDUCT DESCRIBED IN THE DFS ORDER INCLUDES (I) THE FAILURE OF GS GROUP TO ADEQUATELY DETECT OR ADDRESS CERTAIN RED FLAGS IN CONNECTION WITH THE 1MDB BOND TRANSACTIONS; (II) GS GROUP'S FAILURE TO ESCALATE OR ADDRESS ALLEGATIONS OF BRIBERY COMMUNICATED TO CERTAIN SENIOR BUSINESS PERSONNEL FOLLOWING THE COMPLETION OF THE 1MDB OFFERINGS; (III) GS GROUP'S FAILURE TO ADDRESS ALLEGATIONS OF ITS EMPLOYEES SUSPECTED INVOLVEMENT IN THE 1MDB MISCONDUCT; AND (IV) GS GROUP'S FAILURE TO CONVEY TO GS BANK RED FLAGS OR INFORMATION KNOWN ABOUT THE 1MDB OFFERINGS OR THE MISCONDUCT OF ITS EMPLOYEES SO THAT GS BANK COULD AFFIRMATIVELY REPORT THE INCIDENT TO THE DFS. THE DFS ORDER ALSO FINDS THAT GS GROUP VIOLATED SECTION 44 OF THE BANKING LAW BY CONDUCTING BUSINESS IN AN UNSAFE AND UNSOUND MANNER AND 3 N.Y.C.R.R. SECTION 300.4 BY FAILING TO SUBMIT A REPORT TO THE SUPERINTENDENT OF THE DFS OF ONE OR MORE INCIDENTS THAT APPEAR TO RELATE TO A PLAN OR SCHEME THAT WOULD BE OF INTEREST TO SIMILAR ORGANIZATIONS LOCATED IN THE SAME AREA OR THROUGH THE STATE.</p>
Initiated By:	NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES
Date Initiated:	10/22/2020
Docket/Case Number:	
Principal Product Type:	Debt - Corporate
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)


Other Sanction(s)/Relief Sought:

Resolution:	Order
Resolution Date:	10/22/2020
Sanctions Ordered:	Monetary/Fine \$150,000,000.00
Other Sanctions Ordered:	
Sanction Details:	PURSUANT TO THE DFS ORDER, THE DFS REQUIRED GS GROUP TO PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$150,000,000.
Firm Statement	GS GROUP PAID A CIVIL MONEY PENALTY IN THE AMOUNT OF \$150,000,000 TO THE DFS.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS MEXICO, CASA DE BOLSA, S.A. DE C.V.
Current Status:	Final
Allegations:	ON AUGUST 19, 2020, GOLDMAN SACHS MEXICO, S.A. DE C.V. CASA DE BOLSA ("MCBO") RECEIVED A FINE IMPOSED BY THE NATIONAL BANKING AND SECURITIES COMMISSION (COMISION NACIONAL BANCARIA Y DE VALORES - "CNBV") OF 403,000 PESOS (APPROXIMATELY 18,500 USD), FOR AN ALLEGED VIOLATION OF ARTICLE 212, PARAGRAPH ONE, SUB-SECTION I, OF THE LMV. CNBV ALLEGED MCBO FAILED TO MAINTAIN AN APPROPRIATE FINANCIAL CRIMES RISK ASSESSMENT POLICY. MCBO PAID THE FINE OF 403,000 PESOS ON SEPTEMBER 29, 2020. AN ADMINISTRATIVE AND A JUDICIAL APPEAL WERE FILED, LEADING ULTIMATELY ON MARCH 2022 TO A RESOLVE OF THIS MATTER IN FAVOR OF MCBO. THE PENALTY IMPOSED BY THE CNBV WAS ANNULLED, AND MCBO OBTAINED A REFUND IN THE UPDATED AMOUNT (BASED ON INFLATION INDEX) OF 440,842 PESOS (APPROXIMATELY 20,700 USD).
Initiated By:	NATIONAL BANKING AND SECURITIES COMMISSION (COMISION NACIONAL BANCARIA Y DE VALORES -"CNBV")
Date Initiated:	08/19/2020
Docket/Case Number:	211-2/81637-RDGH/2020
Principal Product Type:	No Product
Other Product Type(s):	



Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Other

Resolution Date: 03/04/2022

Sanctions Ordered:

Other Sanctions Ordered:

Sanction Details: MCBO PAID THE FINE OF 403,000 PESOS (APPROXIMATELY 18,500 USD) ON SEPTEMBER 29, 2020. AN ADMINISTRATIVE AND A JUDICIAL APPEAL WERE FILED, LEADING ULTIMATELY ON MARCH 2022 TO A RESOLVE OF THIS MATTER IN FAVOR OF MCBO. THE PENALTY IMPOSED BY THE CNBV WAS ANNULLED, AND MCBO OBTAINED A REFUND IN THE UPDATED AMOUNT (BASED ON INFLATION INDEX) OF 440,842 PESOS (APPROXIMATELY 20,700 USD).

Firm Statement MCBO PAID THE FINE OF 403,000 PESOS (APPROXIMATELY 18,500 USD) ON SEPTEMBER 29, 2020. AN ADMINISTRATIVE AND A JUDICIAL APPEAL WERE FILED, LEADING ULTIMATELY ON MARCH 2022 TO A RESOLVE OF THIS MATTER IN FAVOR OF MCBO. THE PENALTY IMPOSED BY THE CNBV WAS ANNULLED, AND MCBO OBTAINED A REFUND IN THE UPDATED AMOUNT (BASED ON INFLATION INDEX) OF 440,842 PESOS (APPROXIMATELY 20,700 USD).

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Reporting Source: Firm

Affiliate: GOLDMAN SACHS AUSTRALIA PTY LTD

Current Status: Final

Allegations: ON NOVEMBER 13, 2019, THE AUSTRALIA SECURITIES EXCHANGE ("ASX") IMPOSED A FINE ON GOLDMAN SACHS AUSTRALIA PTY LTD ("GSA") IN THE AMOUNT OF 50,000 AUSTRALIAN DOLLARS (AUD). ASX CITED VIOLATIONS OF ASX CLEAR (FUTURES) OPERATING RULE 46.1 AND RULE 46.5 IN RELATION TO FUTURES CLEARING AND THE DAILY CLOSE OUT OF BACK-TO-BACK FUTURES POSITIONS, IN PARTICULAR FOR PHYSICALLY SETTLED BANK BILLS FUTURES CONTRACTS.

Initiated By: AUSTRALIA SECURITIES EXCHANGE (ASX)

Date Initiated: 11/13/2019



Docket/Case Number:	2019001
Principal Product Type:	Futures - Financial
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	12/10/2019
Sanctions Ordered:	Monetary/Fine \$34,189.00
Other Sanctions Ordered:	
Sanction Details:	ACKNOWLEDGING THAT, AMONG OTHER MATTERS, THE FIRM HAS UNDERTAKEN MEANINGFUL REMEDIATION AND AN EARLY DECISION BY THE FIRM NOT TO CONTEST THE MATTER, THE FIRM PAID A PENALTY OF 50,000 AUD (PLUS GOODS AND SERVICES TAX) ON DECEMBER 10, 2019 TO THE ASX FOR THE CONTRAVENTION. WHILE THE ACTUAL PAYMENT OF THE FINE WAS MADE IN AUD, BASED ON THE FOREIGN EXCHANGE RATE OF 1 USD: 1.4625 AUD AS OF DECEMBER 9, 2019, THE EQUIVALENT U.S. DOLLAR VALUE WAS APPROXIMATELY 34,189 USD, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE. ASX INTENDS TO PUBLISH A PUBLIC NOTICE ON 16 DECEMBER, 2019 CONCERNING THE CONTRAVENTION.
Firm Statement	THE FINE IMPOSED BY ASX WAS IN THE AMOUNT OF 50,000 AUD, WHICH WAS PAID BY GSA BY WIRE ON DECEMBER 10, 2019. ASX INTENDS TO PUBLISH A PUBLIC NOTICE ON 16 DECEMBER, 2019 CONCERNING THE CONTRAVENTION.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	EUREX DEUTSCHLAND INITIATED A SANCTION PROCEEDING AGAINST GOLDMAN SACHS INTERNATIONAL ("GSI") AND A GSI SALES TRADER ON 7 NOVEMBER 2019 IN RELATION TO A CROSS TRADE IN THE EUREX PRODUCT EURO BUND FUTURE. EUREX DEUTSCHLAND ALLEGES THE CROSS TRADE WAS IN VIOLATION OF PARAGRAPH 2.6 OF THE



CONDITIONS FOR TRADING AT EUREX DEUTSCHLAND.

Initiated By:	EUREX DEUTSCHLAND
Date Initiated:	11/07/2019
Docket/Case Number:	A 2019/31
Principal Product Type:	Futures - Financial
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Reprimand
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	04/23/2020
Sanctions Ordered:	Monetary/Fine \$1,683.50
Other Sanctions Ordered:	EUREX DEUTSCHLAND ISSUED A REPRIMAND AGAINST GSI AND REQUIRED GSI TO BEAR THE COST OF THE REGULATORY PROCEEDING FOR THE AMOUNT OF EUR 2,000.
Sanction Details:	ON APRIL 23, 2020, EUREX DEUTSCHLAND ISSUED A REPRIMAND AGAINST GSI AND REQUIRED GSI TO BEAR THE COST OF THE REGULATORY PROCEEDING FOR THE AMOUNT OF EUR 2,000. GSI PAID THE EUR 2,000 ON SEPTEMBER 10, 2020.
Firm Statement	GSI RESPONDED TO EUREX DEUTSCHLAND ON 2 DECEMBER 2019 SETTING OUT THE FIRM'S POSITION THAT (A) THE TRADE IN QUESTION, WHICH HAD A LEGITIMATE ECONOMIC RATIONALE, WAS INTENDED TO HAPPEN OFF-EXCHANGE USING INTERNAL FLATTENING CONTROLS BUT INSTEAD WAS INADVERTENTLY ROUTED ONTO THE EXCHANGE, (B) THE NAMED SALES TRADER HAD NO INVOLVEMENT IN THE DECISION TO FLATTEN THE TWO POSITIONS INTERNALLY THAT RESULTED IN THE ON-EXCHANGE TRADE AND SO SHOULD BE REMOVED FROM THE SCOPE OF THE PROCEEDINGS, AND (C) THE TRADE DID NOT HAVE ANY MATERIAL IMPACT ON THE MARKET GIVEN THAT THE PRICE OF THE PRODUCT IN QUESTION MOVED BY ONLY EUR 0.01 IN THE MINUTE WHEN THE TRANSACTION TOOK PLACE (A MOVE OF JUST 0.00558%). ON APRIL 23, 2020, EUREX DEUTSCHLAND ISSUED A REPRIMAND AGAINST GSI AND REQUIRED GSI TO BEAR THE COST OF THE REGULATORY PROCEEDING FOR THE AMOUNT OF EUR 2,000 (APPROXIMATELY USD 1683.50). GSI PAID THE EUR 2,000 ON SEPTEMBER 10, 2020.



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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS GROUP, INC.
Current Status:	Final
Allegations:	ON SEPTEMBER 20, 2019 THE SWEDISH FINANCIAL SUPERVISORY AUTHORITY (FINANSINSPEKTIONEN - "SFSA") IMPOSED AN ADMINISTRATIVE FINE ON GOLDMAN SACHS GROUP, INC. ("GS GROUP") IN THE AMOUNT OF 70,000 SWEDISH KRONA (SEK) (APPROXIMATELY USD 7,200). SFSA ALLEGES A VIOLATION BY GS GROUP OF CHAPTER 6, SECTION 3 A, SUBSECTION 1 OF THE FINANCIAL INSTRUMENTS TRADING ACT DUE TO A DELAY IN NOTIFYING A RELEVANT CHANGE IN GS GROUP'S HOLDING OF SHARES AND OTHER FINANCIAL INSTRUMENTS IN FINGERPRINT CARDS AB.
Initiated By:	SWEDISH FINANCIAL SUPERVISORY AUTHORITY (FINANSINSPEKTIONEN - SFSA)
Date Initiated:	09/20/2019
Docket/Case Number:	
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	12/19/2019
Sanctions Ordered:	Monetary/Fine \$7,430.13
Other Sanctions Ordered:	
Sanction Details:	GS GROUP PAID THE FINE OF 70,000 SEK ON DECEMBER 19, 2019 TO THE SFSA BY WIRE. WHILE THE ACTUAL PAYMENT OF THE FINE WAS MADE IN SEK, BASED ON THE FOREIGN EXCHANGE RATE OF 1 USD: 9.4211 SEK AS OF DECEMBER 19, 2019, THE EQUIVALENT U.S. DOLLAR VALUE WAS APPROXIMATELY 7,430.13 USD, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.
Firm Statement	GS GROUP PAID THE FINE OF 70,000 SEK ON DECEMBER 19, 2019 TO THE SFSA BY WIRE. WHILE THE ACTUAL PAYMENT OF THE FINE WAS MADE IN



SEK, BASED ON THE FOREIGN EXCHANGE RATE OF 1 USD: 9.4211 SEK AS OF DECEMBER 19, 2019, THE EQUIVALENT U.S. DOLLAR VALUE WAS APPROXIMATELY 7,430.13 USD, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	AKK - ÁLLAMADÓSSÁG KEZELO KÖZPONT ZÁRTKÖRÜEN MUKÖDO RÉSZVÉNYTÁRSASÁG ALLEGED THAT DURING THE FIRST HALF OF THE CALENDAR YEAR 2019, GOLDMAN SACHS INTERNATIONAL ("GSI") FAILED TO MEET ITS PRIMARY DEALER QUOTING OBLIGATIONS IN ACCORDANCE WITH THE AGENCY CONTRACT BETWEEN GSI AND AKK AND THE RELEVANT MARKET MAKING RULES.
Initiated By:	AKK - ÁLLAMADÓSSÁG KEZELO KÖZPONT ZÁRTKÖRÜEN MUKÖDO RÉSZVÉNYTÁRSASÁG
Date Initiated:	07/02/2019
Docket/Case Number:	
Principal Product Type:	Debt - Government
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	08/01/2019
Sanctions Ordered:	Monetary/Fine \$1,710.50
Other Sanctions Ordered:	
Sanction Details:	AKK - ÁLLAMADÓSSÁG KEZELO KÖZPONT ZÁRTKÖRÜEN MUKÖDO RÉSZVÉNYTÁRSASÁG ALLEGED THAT DURING THE FIRST HALF OF THE CALENDAR YEAR 2019, GOLDMAN SACHS INTERNATIONAL ("GSI") FAILED TO MEET ITS PRIMARY DEALER QUOTING OBLIGATIONS IN ACCORDANCE WITH THE AGENCY CONTRACT BETWEEN GSI AND AKK AND THE RELEVANT MARKET MAKING RULES.

**Firm Statement**

THE AKK IMPOSED A FINE ON GSI IN THE AMOUNT OF HUF 500,000, WHICH WAS PAID BY SUBMISSION OF A WIRE ON AUGUST 1, 2019.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	A BREACH OF ORGANIZATIONAL DUTIES BY FORWARDING UNFLAGGED ORDERS TRANSMITTED BY ONE OF OUR CUSTOMERS VIA DIRECT ELECTRONIC ACCESS TO THE XETRA TRADING PLATFORM OF THE FRANKFURT STOCK EXCHANGE. THIS IS SPECIFICALLY IN REFERENCE TO SECTION 3 (1) OF THE CONDITIONS FOR BUSINESS TRANSACTIONS. A FURTHER BREACH OF THE ORGANIZATIONAL DUTIES OF THE PARTY AS THE INDIRECT TRADING PARTICIPANT WERE NOT AWARE OF THE FWB'S CROSS-TRADE RULES SHOWS THAT THE PARTY DID NOT INFORM OR ONLY INADEQUATELY INFORMED ITS CUSTOMER OF THE FWB'S STOCK EXCHANGE RULES. THIS IS SPECIFICALLY IN REFERENCE TO SECTION 37 (3) OF THE EXCHANGE RULES FOR THE FRANKFURTER WERTPAPIERBORSE.
Initiated By:	FRANKFURTER WERTPAPIERBORSE (FWB)
Date Initiated:	03/14/2019
Docket/Case Number:	H 9-2018
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	05/31/2019
Sanctions Ordered:	Monetary/Fine \$3,344.70
Other Sanctions Ordered:	
Sanction Details:	THE FINE IMPOSED BY FWB WAS IN THE AMOUNT OF 3,000 EUROS (EUR), WHICH WAS PAID BY GSI BY WIRE ON MAY 31, 2019. WHILE THE ACTUAL PAYMENT OF THE FINE WAS MADE IN EUROS, USING THE FEDERAL



RESERVE'S FOREIGN EXCHANGE RATE OF 1 EUR: 1.1149 USD AS OF MAY 31, 2019, THE EQUIVALENT U.S. DOLLAR VALUE WAS APPROXIMATELY 3,344.70 USD, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.

Firm Statement

THE FINE IMPOSED BY FWB WAS IN THE AMOUNT OF 3,000 EUR, WHICH WAS PAID BY GSI BY WIRE ON MAY 31, 2019.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	THE FCA HAS IMPOSED A FINANCIAL PENALTY OF £34,344,700 ON GOLDMAN SACHS INTERNATIONAL ("GSI") FOR FAILURE TO PROVIDE ACCURATE AND TIMELY INFORMATION IN RELATION TO CERTAIN REPORTABLE TRANSACTIONS TO THE FINANCIAL CONDUCT AUTHORITY ("FCA") IN ALLEGED VIOLATION OF SUP 17.4.1EU, SUP 17.1.4R AND SUP 15.6.1R. GSI ALSO FAILED TO TAKE REASONABLE CARE TO ORGANISE AND CONTROL ITS AFFAIRS RESPONSIBLY AND EFFECTIVELY IN RESPECT OF ITS TRANSACTION REPORTING IN ALLEGED VIOLATION OF PRINCIPLE 3 OF THE FCA'S PRINCIPLES FOR BUSINESSES. THE FINE WAS IMPOSED PURSUANT TO SECTION 206 OF THE FINANCIAL SERVICES AND MARKETS ACT 2000.
Initiated By:	FINANCIAL CONTROL AUTHORITY (FCA)
Date Initiated:	03/28/2019
Docket/Case Number:	142888
Principal Product Type:	Derivative(s)
Other Product Type(s):	EQUITY, FIXED INCOME
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	03/28/2019
Sanctions Ordered:	Monetary/Fine \$44,768,316.40
Other Sanctions Ordered:	
Sanction Details:	THE FINE IMPOSED BY THE FINANCIAL CONDUCT AUTHORITY WAS IN THE



AMOUNT OF £49,063,900. HOWEVER, GOLDMAN SACHS INTERNATIONAL AGREED TO RESOLVE THE CASE AND THEREFORE QUALIFIED FOR A 30% DISCOUNT IN THE OVERALL PENALTY REDUCING THE FINE TO £34,344,700. THE FINE WAS PAID BY WIRE ON APRIL 2, 2019. WHILE THE ACTUAL PAYMENT OF THE FINE WAS MADE IN POUND STERLING, THE EQUIVALENT U.S. DOLLAR VALUE ON THE DATE OF THE WIRE WAS \$44,768,316.40, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.

Firm Statement

THE FINE IMPOSED BY THE FINANCIAL CONDUCT AUTHORITY WAS IN THE AMOUNT OF £49,063,900. HOWEVER, GOLDMAN SACHS INTERNATIONAL AGREED TO RESOLVE THE CASE AND THEREFORE QUALIFIED FOR A 30% DISCOUNT IN THE OVERALL PENALTY REDUCING THE FINE TO £34,344,700. THE FINE WAS PAID BY WIRE ON APRIL 2, 2019. WHILE THE ACTUAL PAYMENT OF THE FINE WAS MADE IN POUND STERLING, THE EQUIVALENT U.S. DOLLAR VALUE ON THE DATE OF THE WIRE WAS \$44,768,316.40, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INDIA INVESTMENTS (SINGAPORE) PTE.LTD.
Current Status:	Final
Allegations:	THE FINANCIAL SERVICES COMMISSION OF THE REPUBLIC OF KOREA ("FSC") HAS IMPOSED AN ADMINISTRATIVE FINE ON GOLDMAN SACHS INDIA INVESTMENTS (SINGAPORE) PTE. LTD. ("KRPL") FOR VIOLATION OF CERTAIN SHORT SALE RESTRICTIONS AS SET OUT IN ARTICLE 180(1) OF THE FINANCIAL INVESTMENT SERVICES AND CAPITAL MARKETS ACT (THE "ACT") WITH RESPECT TO CERTAIN OF KRPL'S SHORT SALE ORDERS ON OCTOBER 31, 2017 AND JANUARY 9, 2018. THE FINE WAS IMPOSED PURSUANT TO ARTICLE 449 OF THE ACT, ARTICLE 390 OF THE ENFORCEMENT DECREE OF THE ACT, AND ARTICLES 26 AND 48 OF THE REGULATION ON SANCTIONS AGAINST FINANCIAL INSTITUTIONS.
Initiated By:	FINANCIAL SERVICES COMMISSION OF THE REPUBLIC OF KOREA
Date Initiated:	03/07/2019
Docket/Case Number:	
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)


Other Sanction(s)/Relief Sought:

Resolution: Decision

Resolution Date: 04/02/2019

Sanctions Ordered: Monetary/Fine \$63,615.48

Other Sanctions Ordered:

Sanction Details: THE FINE IMPOSED BY THE FSC WAS IN THE AMOUNT OF 72,000,000 SOUTH KOREAN WON ("KRW"), WHICH WAS PAID BY WIRE ON APRIL 2, 2019. WHILE THE ACTUAL PAYMENT OF THE FINE WAS MADE IN SOUTH KOREAN WON, THE EQUIVALENT U.S. DOLLAR VALUE ON THE DATE OF THE WIRE WAS \$63,615.48, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.

Firm Statement THE FINE IMPOSED BY THE FSC WAS IN THE AMOUNT OF 72,000,000 SOUTH KOREAN WON ("KRW"), WHICH WAS PAID BY KRPL BY WIRE ON APRIL 2, 2019.

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Reporting Source: Firm

Affiliate: GOLDMAN SACHS INTERNATIONAL

Current Status: Final

Allegations: THE FINANCIAL SERVICES COMMISSION OF THE REPUBLIC OF KOREA ("FSC") HAS IMPOSED AN ADMINISTRATIVE FINE ON GOLDMAN SACHS INTERNATIONAL ("GSI") FOR VIOLATION OF CERTAIN SHORT SALE RESTRICTIONS AS SET OUT IN ARTICLES 180(1) AND 180-2(1) OF THE FINANCIAL INVESTMENT SERVICES AND CAPITAL MARKETS ACT (THE "ACT") WITH RESPECT TO CERTAIN OF GSI'S SHORT SALE ORDERS AND SHORT POSITION REPORTS. THE FINE WAS IMPOSED PURSUANT TO ARTICLE 449 OF THE ACT, ARTICLE 390 OF THE ENFORCEMENT DECREE OF THE ACT, ARTICLES 26 AND 48 OF THE REGULATION ON INVESTIGATION OF CAPITAL MARKETS, AND ARTICLE 20 OF THE REGULATION ON EXAMINATION AND SANCTIONS AGAINST FINANCIAL INSTITUTIONS.

Initiated By: FINANCIAL SERVICES COMMISSION OF THE REPUBLIC OF KOREA

Date Initiated: 12/10/2018

Docket/Case Number:

Principal Product Type: Equity Listed (Common & Preferred Stock)

**Other Product Type(s):****Principal Sanction(s)/Relief Sought:**

Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:**Resolution:**

Decision

Resolution Date:

12/10/2018

Sanctions Ordered:

Monetary/Fine \$6,654,607.36

Other Sanctions Ordered:**Sanction Details:**

THE FINE IMPOSED BY THE FSC WAS IN THE AMOUNT OF 7,504,800,000 SOUTH KOREAN WON (KRW), WHICH WAS PAID BY GSI BY WIRE ON DECEMBER 18, 2018. WHILE THE ACTUAL PAYMENT OF THE FINE WAS MADE IN SOUTH KOREAN WON, USING THE FEDERAL RESERVE'S FOREIGN EXCHANGE RATE OF KRW1127.81:USD1 AS OF DECEMBER 18, 2018, THE EQUIVALENT U.S. DOLLAR VALUE ON DECEMBER 18, 2018 WAS APPROXIMATELY \$6,654,607.36, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.

Firm Statement

THE FINE IMPOSED BY THE FSC WAS IN THE AMOUNT OF 7,504,800,000 S OUTH KOREAN WON (KRW), WHICH WAS PAID BY GSI BY WIRE ON DECEMBER 18, 2018.

Disclosure 37 of 82**Reporting Source:**

Firm

Affiliate:

GOLDMAN SACHS INTERNATIONAL

Current Status:

Final

Allegations:

A BREACH OF ORGANIZATIONAL DUTIES BY FORWARDING UNFLAGGED ORDERS TRANSMITTED BY ONE OF OUR CUSTOMERS VIA DIRECT ELECTRONIC ACCESS TO THE XETRA TRADING PLATFORM OF THE FRANKFURT STOCK EXCHANGE. THIS IS SPECIFICALLY IN REFERENCE TO SECTION 3 (1) OF THE CONDITIONS FOR BUSINESS TRANSACTIONS. A FURTHER BREACH OF THE ORGANIZATIONAL DUTIES OF THE PARTY AS THE INDIRECT TRADING PARTICIPANT WERE NOT AWARE OF THE FWB'S CROSS-TRADE RULES SHOWS THAT THE PARTY DID NOT INFORM OR ONLY INADEQUATELY INFORMED ITS CUSTOMER OF THE FWB'S STOCK EXCHANGE RULES. THIS IS SPECIFICALLY IN REFERENCE TO SECTION 37 (3) OF THE EXCHANGE RULES FOR THE FRANKFURTER WERTPAPIERBÖRSE.



Initiated By:	FRANKFURT STOCK EXCHANGE
Date Initiated:	11/05/2018
Docket/Case Number:	H 9-2018
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	05/31/2019
Sanctions Ordered:	Monetary/Fine \$3,344.70
Other Sanctions Ordered:	
Sanction Details:	THE FINE IMPOSED BY FWB WAS IN THE AMOUNT OF 3,000 EUROS (EUR), WHICH WAS PAID BY GSI BY WIRE ON MAY 31, 2019. WHILE THE ACTUAL PAYMENT OF THE FINE WAS MADE IN EUROS, USING THE FEDERAL RESERVE'S FOREIGN EXCHANGE RATE OF 1 EUR: 1.1149 USD AS OF MAY 31, 2019, THE EQUIVALENT U.S. DOLLAR VALUE WAS APPROXIMATELY 3,344.70 USD, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.
Firm Statement	THE FINE MPOSED BY FWB WAS IN THE AMOUNT OF 3,000 EUR, WHICH WAS PAID BY GSI BY WIRE ON MAY 31, 2019.

Disclosure 38 of 82

Reporting Source:	Firm
Affiliate:	THE GOLDMAN SACHS GROUP, INC.
Current Status:	Final
Allegations:	THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES (THE "DFS") HAS ALLEGED THAT: (A) CERTAIN FOREIGN EXCHANGE ("FX") TRADERS AT CERTAIN AFFILIATES OF THE GOLDMAN SACHS GROUP, INC. AND GOLDMAN SACHS BANK USA (TOGETHER, "GOLDMAN SACHS") ENGAGED IN IMPROPER CONDUCT OVER THE PERIOD 2008 THROUGH EARLY 2013; (B) ESCALATION OF CERTAIN COMPLIANCE CONCERNS DID NOT ALWAYS OCCUR AS REQUIRED, ALLOWING POTENTIALLY IMPROPER ACTIVITY TO CONTINUE UNNECESSARILY; AND (C) GOLDMAN SACHS CONDUCTED BANKING BUSINESS IN AN UNSAFE AND UNSOUND MANNER, IN VIOLATION



OF NEW YORK BANKING LAW § 44.

Initiated By: NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES

Date Initiated: 05/01/2018

Docket/Case Number:

Principal Product Type: Other

Other Product Type(s): FOREIGN EXCHANGE

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought: UNDERTAKING

Resolution: Consent

Resolution Date: 05/01/2018

Sanctions Ordered: Monetary/Fine \$54,750,000.00

Other Sanctions Ordered: UNDERTAKING TO SUBMIT, AS APPLICABLE, CERTAIN COMPLIANCE-RELATED PLANS, PROGRAMS AND REPORTS ACCEPTABLE TO THE DFS WITHIN THE APPLICABLE TIME PERIODS SET FORTH IN THE CONSENT ORDER.

Sanction Details: ON MAY 1, 2018, GOLDMAN SACHS AND THE DFS ENTERED INTO A CONSENT ORDER UNDER NEW YORK STATE BANKING LAW §§ 39 AND 44, WHICH ASSESSES GOLDMAN SACHS A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$54,750,000, WHICH GOLDMAN SACHS PAID TO THE DFS ON MAY 8, 2018.

Firm Statement ON MAY 1, 2018, GOLDMAN SACHS AND THE DFS ENTERED INTO A CONSENT ORDER UNDER NEW YORK STATE BANKING LAW §§ 39 AND 44 (THE "CONSENT ORDER"), PURSUANT TO WHICH GOLDMAN SACHS: (A) SHALL NOT IN THE FUTURE REHIRE OR RETAIN A CERTAIN TRADER AS EITHER AN OFFICER, EMPLOYEE, AGENT, CONSULTANT, OR CONTRACTOR OF GOLDMAN SACHS OR ANY AFFILIATE OF GOLDMAN SACHS, OR IN ANY OTHER CAPACITY; (B) SHALL SUBMIT TO THE DFS WITHIN THE APPLICABLE TIME PERIODS SET FORTH IN THE CONSENT ORDER, AN ENHANCED WRITTEN INTERNAL CONTROLS AND COMPLIANCE PROGRAM, COMPLIANCE RISK MANAGEMENT PROGRAM, AND INTERNAL AUDIT PROGRAM, EACH ACCEPTABLE TO THE DFS, ADOPT AND IMPLEMENT THOSE PROGRAMS, AND PROVIDE WRITTEN PROGRESS REPORTS CONCERNING: (I) COMPLIANCE WITH APPLICABLE NEW YORK STATE AND FEDERAL LAWS AND REGULATIONS AS REGARDS ITS FX BUSINESS, AND RECOGNIZED FX INDUSTRY BEST PRACTICES, AS AFFECT OR PERTAIN TO GOLDMAN SACHS OR NEW YORK CUSTOMERS; (II) CREATION OF



ENHANCED POLICIES AND PROCEDURES GOVERNING THE FX BUSINESS, AND GOLDMAN SACHS' COMPLIANCE WITH THOSE POLICIES AND PROCEDURES, AS AFFECT OR PERTAIN TO GOLDMAN SACHS OR NEW YORK CUSTOMERS, AND (III) GOLDMAN SACHS' MAINTENANCE OF AN HONEST, ETHICAL AND FAIR FX BUSINESS AS IT AFFECTS OR PERTAINS TO THE NEW YORK BRANCH OR NEW YORK CUSTOMERS; AND (C) PAID A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$54,750,000 ON MAY 8, 2018.

Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS BANK USA
Current Status:	Final
Allegations:	THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES (THE "DFS") HAS ALLEGED THAT: (A) CERTAIN FOREIGN EXCHANGE ("FX") TRADERS AT CERTAIN AFFILIATES OF THE GOLDMAN SACHS GROUP, INC. AND GOLDMAN SACHS BANK USA (TOGETHER, "GOLDMAN SACHS") ENGAGED IN IMPROPER CONDUCT OVER THE PERIOD 2008 THROUGH EARLY 2013; (B) ESCALATION OF CERTAIN COMPLIANCE CONCERNS DID NOT ALWAYS OCCUR AS REQUIRED, ALLOWING POTENTIALLY IMPROPER ACTIVITY TO CONTINUE UNNECESSARILY; AND (C) GOLDMAN SACHS CONDUCTED BANKING BUSINESS IN AN UNSAFE AND UNSOUND MANNER, IN VIOLATION OF NEW YORK BANKING LAW § 44.
Initiated By:	NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES
Date Initiated:	05/01/2018
Docket/Case Number:	
Principal Product Type:	Other
Other Product Type(s):	FOREIGN EXCHANGE
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	UNDERTAKING
Resolution:	Consent
Resolution Date:	05/01/2018
Sanctions Ordered:	Monetary/Fine \$54,750,000.00
Other Sanctions Ordered:	UNDERTAKING TO SUBMIT, AS APPLICABLE, CERTAIN COMPLIANCE-RELATED PLANS, PROGRAMS AND REPORTS ACCEPTABLE TO THE DFS WITHIN THE APPLICABLE TIME PERIODS SET FORTH IN THE CONSENT



ORDER.

Sanction Details:

ON MAY 1, 2018, GOLDMAN SACHS AND THE DFS ENTERED INTO A CONSENT ORDER UNDER NEW YORK STATE BANKING LAW §§ 39 AND 44, WHICH ASSESSES GOLDMAN SACHS A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$54,750,000, WHICH GOLDMAN SACHS PAID TO THE DFS ON MAY 8, 2018.

Firm Statement

ON MAY 1, 2018, GOLDMAN SACHS AND THE DFS ENTERED INTO A CONSENT ORDER UNDER NEW YORK STATE BANKING LAW §§ 39 AND 44 (THE "CONSENT ORDER"), PURSUANT TO WHICH GOLDMAN SACHS: (A) SHALL NOT IN THE FUTURE REHIRE OR RETAIN A CERTAIN TRADER AS EITHER AN OFFICER, EMPLOYEE, AGENT, CONSULTANT, OR CONTRACTOR OF GOLDMAN SACHS OR ANY AFFILIATE OF GOLDMAN SACHS, OR IN ANY OTHER CAPACITY; (B) SHALL SUBMIT TO THE DFS WITHIN THE APPLICABLE TIME PERIODS SET FORTH IN THE CONSENT ORDER, AN ENHANCED WRITTEN INTERNAL CONTROLS AND COMPLIANCE PROGRAM, COMPLIANCE RISK MANAGEMENT PROGRAM, AND INTERNAL AUDIT PROGRAM, EACH ACCEPTABLE TO THE DFS, ADOPT AND IMPLEMENT THOSE PROGRAMS, AND PROVIDE WRITTEN PROGRESS REPORTS CONCERNING: (I) COMPLIANCE WITH APPLICABLE NEW YORK STATE AND FEDERAL LAWS AND REGULATIONS AS REGARDS ITS FX BUSINESS, AND RECOGNIZED FX INDUSTRY BEST PRACTICES, AS AFFECT OR PERTAIN TO GOLDMAN SACHS OR NEW YORK CUSTOMERS; (II) CREATION OF ENHANCED POLICIES AND PROCEDURES GOVERNING THE FX BUSINESS, AND GOLDMAN SACHS' COMPLIANCE WITH THOSE POLICIES AND PROCEDURES, AS AFFECT OR PERTAIN TO GOLDMAN SACHS OR NEW YORK CUSTOMERS, AND (III) GOLDMAN SACHS' MAINTENANCE OF AN HONEST, ETHICAL AND FAIR FX BUSINESS AS IT AFFECTS OR PERTAINS TO THE NEW YORK BRANCH OR NEW YORK CUSTOMERS; AND (C) PAID A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$54,750,000 ON MAY 8, 2018.

Disclosure 39 of 82

Reporting Source:

Firm

Affiliate:

THE GOLDMAN SACHS GROUP, INC.

Current Status:

Final

Allegations:

THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM (THE "FEDERAL RESERVE") HAS ALLEGED THAT: WHEREAS THE GOLDMAN SACHS GROUP, INC. ("GS GROUP") SERVES AS A FOREIGN EXCHANGE ("FX") DEALER THROUGH CERTAIN OF ITS INDIRECT SUBSIDIARIES ("FX SUBSIDIARIES"), BY BUYING AND SELLING U.S. DOLLARS AND FOREIGN CURRENCY FOR THEIR OWN ACCOUNT AND BY SOLICITING AND RECEIVING ORDERS THROUGH COMMUNICATIONS BETWEEN



CUSTOMERS AND SALES PERSONNEL THAT ARE EXECUTED ON THE SPOT MARKET ("COVERED FX ACTIVITIES"), FROM OCTOBER 2008 THROUGH OCTOBER 2012, GS GROUP AND CERTAIN SUBSIDIARIES (TOGETHER, THE "FIRM"): (A) LACKED ADEQUATE GOVERNANCE, COMPLIANCE RISK MANAGEMENT, COMPLIANCE AND/OR AUDIT POLICIES TO ENSURE THAT THE FX SUBSIDIARIES' COVERED FX ACTIVITIES COMPLIED WITH SAFE AND SOUND BANKING PRACTICES AND APPLICABLE INTERNAL POLICIES; AND (B) HAD DEFICIENT POLICIES AND PROCEDURES THAT PREVENTED IT FROM DETECTING AND ADDRESSING POTENTIALLY UNSOUND CONDUCT BY CERTAIN OF THE FX SUBSIDIARIES' FX TRADERS, AND AS A RESULT OF THE DEFICIENT POLICIES AND PROCEDURES, ENGAGED IN UNSAFE AND UNSOUND BANKING PRACTICES.

Initiated By:	BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM
Date Initiated:	05/01/2018
Docket/Case Number:	18-015-B-HC; 18-015-CMP-HC
Principal Product Type:	Other
Other Product Type(s):	FOREIGN EXCHANGE
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST; UNDERTAKING
Resolution:	Consent
Resolution Date:	05/01/2018
Sanctions Ordered:	Monetary/Fine \$54,750,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	UNDERTAKING TO SUBMIT, AS APPLICABLE, CERTAIN COMPLIANCE-RELATED PLANS, PROGRAMS AND REPORTS ACCEPTABLE TO THE FEDERAL RESERVE WITHIN THE APPLICABLE TIME PERIODS SET FORTH IN THE CONSENT ORDER.
Sanction Details:	ON MAY 1, 2018, GS GROUP AND THE FEDERAL RESERVE ENTERED INTO AN ORDER TO CEASE AND DESIST AND ORDER OF ASSESSMENT OF A CIVIL MONEY PENALTY ISSUED UPON CONSENT PURSUANT TO THE FEDERAL DEPOSIT INSURANCE ACT, AS AMENDED, WHICH ASSESSES THE FIRM A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$54,750,000, WHICH THE FIRM PAID TO THE FEDERAL RESERVE ON MAY 2, 2018.
Firm Statement	ON MAY 1, 2018, PRIOR TO THE FILING OF ANY NOTICES OF CHARGES, OR TAKING OF ANY TESTIMONY, OR ADJUDICATION OF OR FINDING ON ANY ISSUES OF FACT OR LAW HEREIN, AND SOLELY FOR THE PURPOSE OF



SETTLEMENT OF THIS MATTER WITHOUT A FORMAL PROCEEDING BEING FILED AND WITHOUT THE NECESSITY FOR PROTRACTED OR EXTENDED HEARINGS OR TESTIMONY, GS GROUP AND THE FEDERAL RESERVE ENTERED INTO AN ORDER TO CEASE AND DESIST AND ORDER OF ASSESSMENT OF A CIVIL MONEY PENALTY ISSUED UPON CONSENT PURSUANT TO THE FEDERAL DEPOSIT INSURANCE ACT, AS AMENDED (THE "CONSENT ORDER"), PURSUANT TO WHICH: (A) GS GROUP, AS APPLICABLE, SHALL SUBMIT TO THE FEDERAL RESERVE WITHIN THE APPLICABLE TIME PERIODS SET FORTH IN THE CONSENT ORDER, AN ENHANCED WRITTEN INTERNAL CONTROLS AND COMPLIANCE PROGRAM, COMPLIANCE RISK MANAGEMENT PROGRAM, CONTROLS REVIEW, AND INTERNAL AUDIT PROGRAM, EACH AS ACCEPTABLE TO THE FEDERAL RESERVE; (B) THE FIRM SHALL ADOPT AND IMPLEMENT THESE PROGRAMS AND SUBMIT PROGRESS REPORTS TO THE FEDERAL RESERVE; (C) THE FIRM SHALL NOT IN THE FUTURE DIRECTLY OR INDIRECTLY RETAIN ANY INDIVIDUAL AS AN OFFICER, EMPLOYEE, AGENT, CONSULTANT, OR CONTRACTOR OF THE FIRM OR ANY SUBSIDIARY OR ANY AFFILIATE THEREOF WHO HAS PARTICIPATED IN THE CONDUCT UNDERLYING THE CONSENT ORDER, BEEN SUBJECT TO A FORMAL DISCIPLINARY ACTION AS A RESULT OF THE FIRM'S INTERNAL DISCIPLINARY REVIEW OR PERFORMANCE REVIEW IN CONNECTION WITH THE CONDUCT DESCRIBED IN THE CONSENT ORDER AND SEPARATED FROM THE FIRM OR ANY SUBSIDIARY THEREOF OR HAD HIS OR HER EMPLOYMENT TERMINATED IN CONNECTION WITH THE CONDUCT DESCRIBED IN THE CONSENT ORDER; AND (D) THE FIRM PAID A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$54,750,000 ON MAY 2, 2018.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS BANK USA
Current Status:	Final
Allegations:	THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM (THE "FEDERAL RESERVE") ALLEGED THAT GOLDMAN SACHS BANK USA ("GS BANK"), ENGAGED IN A PATTERN OR PRACTICE OF VIOLATIONS UNDER SECTION 102(F)(2) OF THE NATIONAL FLOOD INSURANCE ACT, 42 U.S.C. 4012A(F).
Initiated By:	BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM
Date Initiated:	01/12/2018
Docket/Case Number:	17-045-CMP-SM



Principal Product Type:	Insurance
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	01/12/2018
Sanctions Ordered:	Monetary/Fine \$90,000.00
Other Sanctions Ordered:	
Sanction Details:	ON JANUARY 12, 2018, GS BANK AND THE FEDERAL RESERVE ENTERED INTO AN ORDER OF ASSESSMENT OF A CIVIL MONEY PENALTY PURSUANT TO THE NATIONAL FLOOD INSURANCE ACT, AS AMENDED, WHICH ASSESSES GS BANK A CIVIL MONEY PENALTY IN THE AMOUNT OF \$90,000, WHICH WAS PAID TO THE FEDERAL RESERVE BY SUBMISSION OF A CHECK ON JANUARY 12, 2018.
Firm Statement	ON JANUARY 12, 2018, PRIOR TO THE TAKING OF ANY TESTIMONY OR ADJUDICATION OF OR FINDING ON ANY ISSUE OF FACT OR LAW, AND SOLELY FOR THE PURPOSE OF SETTLEMENT OF THE MATTER WITHOUT A FORMAL PROCEEDING BEING FILED AND WITHOUT THE NECESSITY FOR PROTRACTED OR EXTENDED HEARINGS OR TESTIMONY, GS BANK AND THE FEDERAL RESERVE ENTERED INTO AN ORDER OF ASSESSMENT OF A CIVIL MONEY PENALTY PURSUANT TO THE NATIONAL FLOOD INSURANCE ACT, AS AMENDED, WHICH ASSESSES GS BANK A CIVIL MONEY PENALTY IN THE AMOUNT OF \$90,000, WHICH WAS PAID TO THE FEDERAL RESERVE BY SUBMISSION OF A CHECK ON JANUARY 12, 2018.

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Reporting Source:	Firm
Affiliate:	THE GOLDMAN SACHS GROUP, INC.
Current Status:	Final
Allegations:	THE GOLDMAN SACHS GROUP, INC. ("GS GROUP") AND GOLDMAN SACHS BANK USA ("GS BANK") ENTERED INTO AN ORDER OF ASSESSMENT OF A CIVIL MONEY PENALTY ISSUED UPON CONSENT PURSUANT TO THE FEDERAL DEPOSIT INSURANCE ACT, AS AMENDED, WITH THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM (THE "FEDERAL RESERVE") ON JANUARY 12, 2018 (THE "CONSENT ASSESSMENT"). THE



CONSENT ASSESSMENT RELATED TO ALLEGATIONS BY THE FEDERAL RESERVE THAT, PRIOR TO SEPTEMBER 1, 2011, GS GROUP AND GS BANK HAD ENGAGED IN DEFICIENT PRACTICES IN RESIDENTIAL MORTGAGE LOAN SERVICING AND FORECLOSURE PROCESSING INVOLVING LITTON LOAN SERVICING LP ("LITTON"), A FORMER SUBSIDIARY. WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, GS GROUP AND GS BANK HAD PREVIOUSLY ENTERED INTO A CONSENT ORDER WITH THE FEDERAL RESERVE RELATING TO THE SAME ALLEGED CONDUCT ON SEPTEMBER 1, 2011, AS AMENDED ON FEBRUARY 28, 2013 (THE "AMENDED CONSENT", WHICH IS REPORTED ON A SEPARATE DRP).

Initiated By: BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM

Date Initiated: 01/12/2018

Docket/Case Number: 17-047-CMP-HC; 17-0 47-CMP-SM

Principal Product Type: Other

Other Product Type(s): RESIDENTIAL MORTGAGE LOANS

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 01/12/2018

Sanctions Ordered: Monetary/Fine \$14,000,000.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS IN THE AMENDED CONSENT, GS GROUP, GS BANK AND THE FEDERAL RESERVE ENTERED INTO THE CONSENT ASSESSMENT, WHICH RELEASES AND DISCHARGES GS GROUP, GS BANK, AND THEIR AFFILIATES, SUCCESSORS, AND ASSIGNS FROM ALL POTENTIAL LIABILITY THAT HAS BEEN OR MIGHT HAVE BEEN ASSERTED BY THE FEDERAL RESERVE BASED ON THE CONDUCT THAT IS THE SUBJECT OF CONSENT ASSESSMENT OR THE AMENDED CONSENT, AND ASSESSES GS GROUP AND GS BANK A CIVIL MONEY PENALTY IN THE AMOUNT OF \$14,000,000, WHICH WAS PAID BY SUBMISSION OF A WIRE ON JANUARY 12, 2018.

Firm Statement WITHOUT ADMITTING OR DENYING THE ALLEGATIONS IN THE AMENDED CONSENT, GS GROUP, GS BANK AND THE FEDERAL RESERVE ENTERED INTO THE CONSENT ASSESSMENT, WHICH RELEASES AND DISCHARGES GS GROUP, GS BANK, AND THEIR AFFILIATES, SUCCESSORS, AND ASSIGNS FROM ALL POTENTIAL LIABILITY THAT HAS BEEN OR MIGHT



HAVE BEEN ASSERTED BY THE FEDERAL RESERVE BASED ON THE CONDUCT THAT IS THE SUBJECT OF CONSENT ASSESSMENT OR THE AMENDED CONSENT, AND ASSESSES GS GROUP AND GS BANK A CIVIL MONEY PENALTY IN THE AMOUNT OF \$14,000,000, WHICH WAS PAID BY SUBMISSION OF A WIRE ON JANUARY 12, 2018.

Reporting Source: Firm

Affiliate: GOLDMAN SACHS BANK USA

Current Status: Final

Allegations: THE GOLDMAN SACHS GROUP, INC. ("GS GROUP") AND GOLDMAN SACHS BANK USA ("GS BANK") ENTERED INTO AN ORDER OF ASSESSMENT OF A CIVIL MONEY PENALTY ISSUED UPON CONSENT PURSUANT TO THE FEDERAL DEPOSIT INSURANCE ACT, AS AMENDED, WITH THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM (THE "FEDERAL RESERVE") ON JANUARY 12, 2018 (THE "CONSENT ASSESSMENT"). THE CONSENT ASSESSMENT RELATED TO ALLEGATIONS BY THE FEDERAL RESERVE THAT, PRIOR TO SEPTEMBER 1, 2011, GS GROUP AND GS BANK HAD ENGAGED IN DEFICIENT PRACTICES IN RESIDENTIAL MORTGAGE LOAN SERVICING AND FORECLOSURE PROCESSING INVOLVING LITTON LOAN SERVICING LP ("LITTON"), A FORMER SUBSIDIARY. WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, GS GROUP AND GS BANK HAD PREVIOUSLY ENTERED INTO A CONSENT ORDER WITH THE FEDERAL RESERVE RELATING TO THE SAME ALLEGED CONDUCT ON SEPTEMBER 1, 2011, AS AMENDED ON FEBRUARY 28, 2013 (THE "AMENDED CONSENT", WHICH IS REPORTED ON A SEPARATE DRP).

Initiated By: BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM

Date Initiated: 01/12/2018

Docket/Case Number: 17-047-CMP-HC; 17-0 47-CMP-SM

Principal Product Type: Other

Other Product Type(s): RESIDENTIAL MORTGAGE LOANS

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 01/12/2018



Sanctions Ordered: Monetary/Fine \$14,000,000.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS IN THE AMENDED CONSENT, GS GROUP, GS BANK AND THE FEDERAL RESERVE ENTERED INTO THE CONSENT ASSESSMENT, WHICH RELEASES AND DISCHARGES GS GROUP, GS BANK, AND THEIR AFFILIATES, SUCCESSORS, AND ASSIGNS FROM ALL POTENTIAL LIABILITY THAT HAS BEEN OR MIGHT HAVE BEEN ASSERTED BY THE FEDERAL RESERVE BASED ON THE CONDUCT THAT IS THE SUBJECT OF CONSENT ASSESSMENT OR THE AMENDED CONSENT, AND ASSESSES GS GROUP AND GS BANK A CIVIL MONEY PENALTY IN THE AMOUNT OF \$14,000,000, WHICH WAS PAID BY SUBMISSION OF A WIRE ON JANUARY 12, 2018.

Firm Statement WITHOUT ADMITTING OR DENYING THE ALLEGATIONS IN THE AMENDED CONSENT, GS GROUP, GS BANK AND THE FEDERAL RESERVE ENTERED INTO THE CONSENT ASSESSMENT, WHICH RELEASES AND DISCHARGES GS GROUP, GS BANK, AND THEIR AFFILIATES, SUCCESSORS, AND ASSIGNS FROM ALL POTENTIAL LIABILITY THAT HAS BEEN OR MIGHT HAVE BEEN ASSERTED BY THE FEDERAL RESERVE BASED ON THE CONDUCT THAT IS THE SUBJECT OF CONSENT ASSESSMENT OR THE AMENDED CONSENT, AND ASSESSES GS GROUP AND GS BANK A CIVIL MONEY PENALTY IN THE AMOUNT OF \$14,000,000, WHICH WAS PAID BY SUBMISSION OF A WIRE ON JANUARY 12, 2018.

Disclosure 42 of 82

Reporting Source: Firm

Affiliate: THE GOLDMAN SACHS GROUP, INC.

Current Status: Final

Allegations: THE CZECH NATIONAL BANK ("CNB") ISSUED AN ORDER ALLEGING THAT THE GOLDMAN SACHS GROUP, INC. (THE "FIRM") FAILED TO NOTIFY THE CNB WITHIN THE STATUTORY TIME LIMIT THAT ITS SHARES IN THE VOTING RIGHTS OF A CERTAIN ISSUER COMPANY HAD EXCEEDED 1%, IN DEEMED VIOLATION OF ARTICLE 122(1), AND IN CONJUNCTION WITH ARTICLE 122(2), OF THE CAPITAL MARKET UNDERTAKINGS ACT.

Initiated By: THE CZECH NATIONAL BANK

Date Initiated: 01/04/2018

Docket/Case Number: 2017 / 158544 / 570 ; 2018 / 095899 / CNB / 110

Principal Product Type: No Product

**Other Product Type(s):****Principal Sanction(s)/Relief Sought:**

Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:**Resolution:**

Decision

Resolution Date:

08/13/2018

Sanctions Ordered:

Monetary/Fine \$33,945.00

Other Sanctions Ordered:**Sanction Details:**

THE CNB IMPOSED A FINE ON THE FIRM IN THE AMOUNT OF 750,000 CZECH KORUNA (CZK), TOGETHER WITH COSTS OF 1,000 CZK, WHICH WAS PAID BY WIRE ON SEPTEMBER 7, 2018. WHILE THE ACTUAL PAYMENT OF THE FINE AND COSTS WAS MADE IN CZECH KORUNA, USING THE CNB FOREIGN EXCHANGE RATE OF CZK22.124:USD1 AS OF SEPTEMBER 7, 2018, THE EQUIVALENT U.S. DOLLAR VALUE ON SEPTEMBER 7, 2018 WAS APPROXIMATELY \$33,945.00, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.

Firm Statement

THE CNB IMPOSED A FINE ON THE FIRM IN THE AMOUNT OF 750,000 CZECH KORUNA (CZK), TOGETHER WITH COSTS OF 1,000 CZK, WHICH WAS PAID BY WIRE ON SEPTEMBER 7, 2018.

Disclosure 43 of 82**Reporting Source:**

Firm

Affiliate:

GOLDMAN SACHS INTERNATIONAL

Current Status:

Final

Allegations:

ON SEPTEMBER 19, 2017 FEDERAL FINANCIAL SUPERVISORY AUTHORITY OF GERMANY (BUNDESANSTALT FÜR FINANZDIENSTLEISTUNGS AUFSICHT - "BAFIN") HAS ALLEGED CERTAIN BREACHES BY GOLDMAN SACHS INTERNATIONAL ("GSI") IN MARCH 2017 OF SECTIONS 21(1) AND 25(1) OF THE GERMAN SECURITIES TRADING ACT (WERTPAPIERHANDELSGESETZ - "WPHG") AS A RESULT OF GSI'S LATE SUBMISSION OF A SHAREHOLDER VOTING RIGHTS NOTIFICATION. ON AUGUST 12, 2019 BAFIN IMPOSED AN ADMINISTRATIVE FINE ON GSI IN THE AMOUNT OF 800,000 EUROS FOR A BREACH OF SECTION 130(1) OF THE GERMAN ACT OF BREACHES OF ADMINISTRATIVE REGULATIONS IN CONJUNCTION WITH SECTION 25(1) OF THE GERMAN SECURITIES TRADING ACT. THIS FINE CONCLUDED CASES WA 17-WP 3121-2017/0003 AND WA 17-WP 3120-2016/0060.



Initiated By:	BAFIN - THE FEDERAL FINANCIAL SUPERVISORY AUTHORITY OF GERMANY
Date Initiated:	09/19/2017
Docket/Case Number:	GZ: WA 17-WP 3121-2017/0003
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	09/04/2019
Sanctions Ordered:	Monetary/Fine \$882,000.00
Other Sanctions Ordered:	
Sanction Details:	THE FINE IMPOSED BY BAFIN WAS IN THE AMOUNT OF 800,000 EUROS (EUR), WHICH WAS PAID BY GSI BY WIRE ON SEPTEMBER 4, 2019. WHILE THE ACTUAL PAYMENT OF THE FINE WAS MADE IN EUROS, USING THE FEDERAL RESERVE'S FOREIGN EXCHANGE RATE OF EUR 1: USD 1.1025 AS OF SEPTEMBER 4, 2019, THE EQUIVALENT U.S. DOLLAR VALUE ON SEPTEMBER 4, 2019 WAS APPROXIMATELY \$882,000, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.
Firm Statement	THE FINE IMPOSED BY BAFIN WAS IN THE AMOUNT OF 800,000 EUR, WHICH WAS PAID BY GSI BY WIRE ON SEPTEMBER 4, 2019.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS (INDIA) SECURITIES PRIVATE LIMITED
Current Status:	Final
Allegations:	IN A NOTICE TO GOLDMAN SACHS (INDIA) SECURITIES PRIVATE LIMITED ("GIPL"), THE SECURITIES AND EXCHANGE BOARD OF INDIA ("SEBI") ALLEGED THAT GIPL MADE CERTAIN MISLEADING STATEMENTS TO SEBI FOLLOWING THE DEFERRAL OF A QUALIFIED INSTITUTIONAL PLACEMENT OF SECURITIES IN INDIA, IN ALLEGED VIOLATION OF PARAGRAPH 20 OF THE CODE OF CONDUCT FOR MERCHANT BANKERS UNDER THE SEBI (MERCHANT BANKERS) REGULATIONS, 1992.



Initiated By:	SECURITIES AND EXCHANGE BOARD OF INDIA
Date Initiated:	06/16/2017
Docket/Case Number:	EAD-2/DSR/RG/14036/2017-PM/RR/02/2018-19
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	06/29/2018
Sanctions Ordered:	Monetary/Fine \$30,457.42
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS OF FACT AND CONCLUSIONS OF LAW, GIPL AGREED TO MAKE A MONETARY PAYMENT TO SEBI IN THE AMOUNT OF 20,80,242 INDIAN RUPEES (INR), WHICH WAS PAID BY SUBMISSION OF A BANK DEMAND DRAFT ON JUNE 19, 2018. WHILE THE ACTUAL PAYMENT WAS MADE IN INDIAN RUPEES, USING THE FEDERAL RESERVE FOREIGN EXCHANGE RATE OF INR68.30:USD1 AS OF JUNE 19, 2018, THE EQUIVALENT U.S. DOLLAR VALUE ON JUNE 19, 2018 WAS \$30,457.42, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS OF FACT AND CONCLUSIONS OF LAW, GIPL SUBMITTED A SETTLEMENT APPLICATION TO SEBI WHICH WAS ACCEPTED BY SEBI ON JUNE 29, 2018, IN WHICH GIPL AGREED TO MAKE A MONETARY PAYMENT TO SEBI IN THE AMOUNT OF 20,80,242 INDIAN RUPEES (INR), WHICH WAS PAID BY SUBMISSION OF A BANK DEMAND DRAFT ON JUNE 19, 2018.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	ON MAY 2, 2017 FEDERAL FINANCIAL SUPERVISORY AUTHORITY OF GERMANY (BUNDESANSTALT FÜR FINANZDIENSTLEISTUNGSAUFSICHT - "BAFIN") HAS ALLEGED CERTAIN



BREACHES BY GOLDMAN SACHS INTERNATIONAL ("GSI") IN MAY 2016 OF SECTIONS 21(1) AND 25(1) OF THE GERMAN SECURITIES TRADING ACT (WERTPAPIERHANDELSGESETZ - "WPHG") AS A RESULT OF GSI'S LATE SUBMISSION OF A SHAREHOLDER VOTING RIGHTS NOTIFICATION. ON AUGUST 12, 2019 BAFIN IMPOSED AN ADMINISTRATIVE FINE ON GSI IN THE AMOUNT OF 800,000 EUROS FOR A BREACH OF SECTION 130(1) OF THE GERMAN ACT OF BREACHES OF ADMINISTRATIVE REGULATIONS IN CONJUNCTION WITH SECTION 25(1) OF THE GERMAN SECURITIES TRADING ACT. THIS FINE CONCLUDED CASES WA 17-WP 3121-2017/0003 AND WA 17-WP 3120-2016/0060.

Initiated By:	FEDERAL FINANCIAL SUPERVISORY AUTHORITY OF GERMANY (BUNDESANSTALT FÜR FINANZDIENSTLEISTUNGSAUFSICHT - "BAFIN")
Date Initiated:	05/02/2017
Docket/Case Number:	GZ: WA 17-WP 3120-2016/0060
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	09/04/2019
Sanctions Ordered:	Monetary/Fine \$882,000.00
Other Sanctions Ordered:	
Sanction Details:	THE FINE IMPOSED BY BAFIN WAS IN THE AMOUNT OF 800,000 EUROS (EUR), WHICH WAS PAID BY GSI BY WIRE ON SEPTEMBER 4, 2019. WHILE THE ACTUAL PAYMENT OF THE FINE WAS MADE IN EUROS, USING THE FEDERAL RESERVE'S FOREIGN EXCHANGE RATE OF EUR 1: USD 1.1025 AS OF SEPTEMBER 4, 2019, THE EQUIVALENT U.S. DOLLAR VALUE ON SEPTEMBER 4, 2019 WAS APPROXIMATELY \$882,000, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.
Firm Statement	THE FINE IMPOSED BY BAFIN WAS IN THE AMOUNT OF 800,000 EUR, WHICH WAS PAID BY GSI BY WIRE ON SEPTEMBER 4, 2019.

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Reporting Source: Firm



Affiliate:	GOLDMAN SACHS SAUDI ARABIA
Current Status:	Final
Allegations:	IN A LETTER TO GOLDMAN SACHS SAUDI ARABIA ("GSSA") DATED FEBRUARY 16, 2017, THAT WAS RECEIVED BY HAND DELIVERY ON FEBRUARY 22, 2017, FROM THE KINGDOM OF SAUDI ARABIA CAPITAL MARKET AUTHORITY (THE "CMA"), THE CMA INFORMED GSSA OF A CMA DECISION ALLEGING A DELAY OF MORE THAN THREE DAYS IN PROVIDING THE CMA WITH THE CERTAIN ACCOUNT INFORMATION REQUIRED BY VIRTUE OF CMA CIRCULAR NO. S/6/6/9214/16, DATED DECEMBER 6, 2016, IN ALLEGED VIOLATION OF SECTION (A) OF ARTICLE 3 OF THE AUTHORIZED PERSONS REGULATIONS.
Initiated By:	CAPITAL MARKET AUTHORITY OF THE KINGDOM OF SAUDI ARABIA
Date Initiated:	02/22/2017
Docket/Case Number:	S/3/7/876/17
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	02/22/2017
Sanctions Ordered:	Monetary/Fine \$2,666.67
Other Sanctions Ordered:	
Sanction Details:	GSSA AGREED TO THE PAYMENT OF A FINANCIAL PENALTY TO THE CMA IN THE AMOUNT OF 10,000 SAUDI ARABIAN RIYALS (SAR), WHICH WAS PAID BY SUBMISSION OF A WIRE ON MARCH 1, 2017. WHILE THE ACTUAL PAYMENT WAS MADE IN SAUDI ARABIAN RIYALS, USING THE FOREIGN EXCHANGE SPOT RATE OF SAR1:USD0.266666 AS OF MARCH 1, 2017, THE EQUIVALENT U.S. DOLLAR VALUE ON MARCH 1, 2017 WAS US\$2,666.67, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.
Firm Statement	GSSA AGREED TO THE PAYMENT OF A FINANCIAL PENALTY TO THE CMA IN THE AMOUNT OF 10,000 SAUDI ARABIAN RIYALS (SAR), WHICH WAS PAID BY SUBMISSION OF A WIRE ON MARCH 1, 2017.



Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	THE FRANKFURT STOCK EXCHANGE ("FSE") SANCTIONS COMMITTEE (THE "SANCTIONS COMMITTEE") ALLEGED THAT GOLDMAN SACHS INTERNATIONAL ("GSI") VIOLATED SEC. 72A OF THE EXCHANGE RULES OF THE FSE BY CONVEYING CERTAIN UNLABELED ORDERS GENERATED BY ALGORITHMIC TRADING TO THE XETRA TRADING PLATFORM OF THE FSE IN THE PERIOD FROM MARCH 29, 2016 TO SEPTEMBER 20, 2016.
Initiated By:	FRANKFURT STOCK EXCHANGE
Date Initiated:	12/07/2016
Docket/Case Number:	H 15-2016
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Reprimand
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	02/21/2017
Sanctions Ordered:	
Other Sanctions Ordered:	THE FSE ISSUED A REPRIMAND TO GSI, AND REQUIRED GSI TO PAY A 500 EURO FEE FOR THE PROCEEDINGS.
Sanction Details:	THE FSE ISSUED A REPRIMAND TO GSI, AND REQUIRED GSI TO PAY A 500 EURO FEE FOR THE PROCEEDINGS.
Firm Statement	THE FSE ISSUED A REPRIMAND TO GSI, AND REQUIRED GSI TO PAY A 500 EURO FEE FOR THE PROCEEDINGS. IN ITS DECISION, THE FSE NOTED THAT GSI DISCOVERED THE ERROR ITSELF AND THEN IMMEDIATELY DISCLOSED AND REMEDIED IT.

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Reporting Source:	Firm
Affiliate:	THE GOLDMAN SACHS GROUP, INC.



Current Status:	Final
Allegations:	<p>ON DECEMBER 21, 2016, THE COMMODITY FUTURES TRADING COMMISSION ("CFTC") ENTERED AN ORDER INSTITUTING PROCEEDINGS PURSUANT TO SECTIONS 6(C) AND 6(D) OF THE COMMODITY EXCHANGE ACT, MAKING FINDINGS AND IMPOSING REMEDIAL SANCTIONS (THE "ORDER") AGAINST THE GOLDMAN SACHS GROUP, INC. ("GS GROUP") AND GOLDMAN, SACHS & CO. (THE "FIRM", AND TOGETHER WITH GS GROUP, "GOLDMAN") RELATING TO ATTEMPTED MANIPULATION OF THE U.S. DOLLAR INTERNATIONAL SWAPS AND DERIVATIVES ASSOCIATION FIX ("USD ISDAFIX"), AN INTEREST RATE BENCHMARK. SPECIFICALLY, THE CFTC FOUND THAT, FROM JANUARY 2007 THROUGH MARCH 2012, CERTAIN TRADERS ON THE FIRM'S INTEREST RATE PRODUCTS TRADING DESKS SUBMITTED BIDS AND OFFERS, AND EXECUTED TRADES, THAT WERE DESIGNED TO ATTEMPT TO MANIPULATE THE USD ISDAFIX. IN ADDITION, THE CFTC FOUND THAT THESE TRADERS ATTEMPTED TO AFFECT THE RATE AT WHICH USD ISDAFIX WAS SET BY MAKING FALSE, MISLEADING, OR KNOWINGLY INACCURATE SUBMISSIONS TO CERTAIN SWAPS BROKERS FOR INCLUSION IN THE CALCULATION OF THE DAILY RATES. THE ORDER ALSO STATES THAT THE TRADERS SUBMITTED ORAL AND WRITTEN REQUESTS FOR CERTAIN RATES TO BE SUBMITTED, WHICH WOULD BENEFIT THE FIRM'S TRADING POSITIONS. THE CFTC FOUND THAT GOLDMAN VIOLATED COMMODITY EXCHANGE ACT SECTIONS 6(C), 6(D), AND 9(A)(2), 7 U.S.C. §§ 9, 13B, 13(A)(2) (2006), AND FOR CONDUCT OCCURRING ON OR AFTER AUGUST 15, 2011, SECTIONS 6(C)(1), 6(C)(1)(A), 6(C)(3), 6(D), AND 9(A)(2), 7 U.S.C. §§ 9(1), 9(1)(A), 9(3), 13B, 13(A)(2) (2012), AND CFTC REGULATIONS 180.1(A) AND 180.2, 17 C.F.R. §§ 180.1(A), 180.2 (2015).</p>
Initiated By:	COMMODITY FUTURES TRADING COMMISSION
Date Initiated:	12/21/2016
Docket/Case Number:	17-03
Principal Product Type:	Other
Other Product Type(s):	U.S. DOLLAR INTERNATIONAL SWAPS AND DERIVATIVES ASSOCIATION FIX
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST / UNDERTAKING
Resolution:	Order
Resolution Date:	12/21/2016
Sanctions Ordered:	Monetary/Fine \$120,000,000.00



Cease and Desist/Injunction

Other Sanctions Ordered:

THE ORDER REQUIRED GOLDMAN TO COMPLY WITH THE CERTAIN UNDERTAKINGS, INCLUDING PROVIDING A REPORT TO THE CFTC WITHIN 120 DAYS OF THE ORDER, ADDRESSING REMEDIATION EFFORTS BOTH PRIOR TO AND SINCE THE ENTRY OF THE ORDER, AND PROVIDING AN ADDITIONAL REPORT TO THE CFTC, NO LATER THAN 365 DAYS OF THE ENTRY OF THE ORDER, EXPLAINING HOW IT HAS COMPLIED WITH THE UNDERTAKINGS SET FORTH IN THE ORDER.

Sanction Details:

THE ORDER REQUIRED GOLDMAN TO PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$120 MILLION, WHICH THE FIRM PAID ON DECEMBER 28, 2016.

Firm Statement

WITHOUT ADMITTING OR DENYING THE VIOLATIONS, GOLDMAN CONSENTED TO THE ENTRY OF THE ORDER ON DECEMBER 21, 2016 BY THE CFTC, PURSUANT TO WHICH GOLDMAN: (A) SHALL CEASE AND DESIST FROM VIOLATING COMMODITY EXCHANGE ACT SECTIONS 6(C)(1), 6(C)(1)(A), 6(C)(3), 6(D), AND 9(A)(2), 7 U.S.C. §§ 9(1), 9(1)(A), 9(3), 13B, 13(A)(2) (2012), AND CFTC REGULATIONS 180.1(A) AND 180.2, 17 C.F.R. §§ 180.1(A), 180.2 (2015); (B) PAY A CIVIL MONETARY PENALTY OF \$120 MILLION, WHICH THE FIRM PAID ON DECEMBER 28, 2016; AND (C) COMPLY WITH THE UNDERTAKINGS SET FORTH IN THE ORDER, INCLUDING PROVIDING A REPORT TO THE CFTC WITHIN 120 DAYS OF THE ORDER, ADDRESSING REMEDIATION EFFORTS BOTH PRIOR TO AND SINCE THE ENTRY OF THE ORDER, AND PROVIDING AN ADDITIONAL REPORT TO THE CFTC, NO LATER THAN 365 DAYS OF THE ENTRY OF THE ORDER, EXPLAINING HOW IT HAS COMPLIED WITH THE UNDERTAKINGS SET FORTH IN THE ORDER.

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Reporting Source:

Firm

Affiliate:

GOLDMAN SACHS SAUDI ARABIA

Current Status:

Final

Allegations:

IN A LETTER DATED MAY 12, 2016 TO GOLDMAN SACHS SAUDI ARABIA ("GSSA") FROM THE KINGDOM OF SAUDI ARABIA CAPITAL MARKET AUTHORITY (THE "CMA"), THE CMA INFORMED GSSA OF A CMA DECISION ALLEGING THAT THERE WAS ONLY ONE INDIVIDUAL ASSOCIATED WITH GSSA REGISTERED WITH THE CMA UNDER INVESTMENT FUND MANAGEMENT AND CLIENT PORTFOLIO MANAGEMENT ACTIVITIES, IN ALLEGED VIOLATION OF CMA CIRCULAR NO. T/1/6/9/15, DATED JUNE 17, 2015.

Initiated By:

CAPITAL MARKET AUTHORITY OF THE KINGDOM OF SAUDI ARABIA



Date Initiated:	05/12/2016
Docket/Case Number:	375/10/2015
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	05/12/2016
Sanctions Ordered:	Monetary/Fine \$2,665.32
Other Sanctions Ordered:	THE CMA'S DECISION STIPULATED THE NEED FOR GSSA TO DISCUSS THE MATTER OF THE VIOLATION AT THE NEXT MEETING OF THE BOARD OF DIRECTORS OF GSSA.
Sanction Details:	GSSA AGREED TO THE PAYMENT OF A FINANCIAL PENALTY TO THE CMA IN THE AMOUNT OF 10,000 SAUDI ARABIAN RIYALS (SAR), WHICH WAS PAID BY SUBMISSION OF A WIRE ON MAY 23, 2016. WHILE THE ACTUAL PAYMENT WAS MADE IN SAUDI ARABIAN RIYALS, USING THE FOREIGN EXCHANGE SPOT RATE OF SAR1:USD0.2665316 AS OF MAY 23, 2016, THE EQUIVALENT U.S. DOLLAR VALUE ON MAY 23, 2016 WAS US\$2,665.32, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.
Firm Statement	GSSA AGREED TO THE PAYMENT OF A FINANCIAL PENALTY TO THE CMA IN THE AMOUNT OF 10,000 SAUDI ARABIAN RIYALS (SAR), WHICH WAS PAID BY SUBMISSION OF A WIRE ON MAY 23, 2016. THE CMA'S DECISION STIPULATED THE NEED FOR GSSA TO DISCUSS THE MATTER OF THE VIOLATION AT THE NEXT MEETING OF THE BOARD OF DIRECTORS OF GSSA.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS (ASIA) L.L.C.
Current Status:	Final
Allegations:	THE SECURITIES AND FUTURES COMMISSION OF HONG KONG ("SFC") CENSURED GOLDMAN SACHS (ASIA) L.L.C. ("GS ASIA") IN RESPECT TO GS ASIA'S FAILURE, WHILE ACTING AS A FINANCIAL ADVISOR IN RELATION TO A VOLUNTARY GENERAL SECURITIES OFFERING ON AN ISSUER, TO (I)



DISCLOSE ITS DEALINGS IN THE RELEVANT SECURITIES BETWEEN NOVEMBER 8, 2013 AND JANUARY 6, 2014, (II) SEEK, DURING THE OFFER PERIOD, THE SFC'S CONSENT PRIOR TO DEALING IN PRINCIPAL TRADES IN THE RELEVANT SECURITIES OF THE ISSUER WHICH FELL OUTSIDE THE SCOPE OF DEALINGS COVERED BY THE EXEMPT PRINCIPAL TRADING AND EXEMPT FUND MANAGER STATUS GRANTED TO CERTAIN GOLDMAN SACHS ENTITIES AND, (III) COMPLY WITH CERTAIN REQUIREMENTS IN RELATION TO RESEARCH REPORTS ON THE ISSUER, IN BREACH OF RULES 22, 21.5, NOTE 4 TO RULE 8.1 AND 10 OF THE CODE OF TAKEOVERS AND MERGERS.

Initiated By:	THE SECURITIES AND FUTURES COMMISSION OF HONG KONG
Date Initiated:	02/02/2016
Docket/Case Number:	6209/2014
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	02/02/2016
Sanctions Ordered:	Censure
Other Sanctions Ordered:	
Sanction Details:	THE SFC ISSUED A PUBLIC CENSURE OF GS ASIA DATED FEBRUARY 2, 2016.
Firm Statement	THE SFC ISSUED A PUBLIC CENSURE OF GS ASIA DATED FEBRUARY 2, 2106 (THE "CENSURE"). IN DECIDING THE CENSURE, THE SFC TOOK INTO ACCOUNT GOLDMAN SACHS' COOPERATION AND SELF-REPORTING OF THE BREACHES.

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Reporting Source:	Firm
Affiliate:	THE GOLDMAN SACHS GROUP, INC.
Current Status:	Final
Allegations:	THE FEDERAL DEPARTMENT OF FINANCE ("FDF") OF THE SWISS



CONFEDERATION ALLEGED THAT THE GOLDMAN SACHS GROUP, INC. ("GS GROUP") PUBLISHED TWICE AN INCOMPLETE NOTIFICATION REGARDING THE FIRM'S HOLDINGS IN CERTAIN SECURITIES IN THE PERIOD BETWEEN DECEMBER 12, 2013 AND FEBRUARY 12, 2014, AND PUBLISHED DELAYED NOTIFICATION OF THE FIRM'S QUALIFIED SHAREHOLDING IN CERTAIN SECURITIES EXCEEDING THE NOTIFICATION THRESHOLD IN THE PERIOD BETWEEN AUGUST 19, 2014 AND AUGUST 8, 2015, EACH IN ALLEGED INFRINGEMENT OF ARTICLE 41 OF THE SWISS FEDERAL ACT ON STOCK EXCHANGES AND SECURITIES TRADING ("SESTA").

Initiated By: SWISS FEDERAL DEPARTMENT OF FINANCE

Date Initiated: 12/08/2015

Docket/Case Number: 442.2-164/194

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: REPARATION PAYMENT

Resolution: Consent

Resolution Date: 12/08/2015

Sanctions Ordered: Monetary/Fine \$20,350.02

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING ANY INTENTIONAL INFRINGEMENT OF SESTA ARTICLES OR WRONGDOING, GS GROUP CONSENTED TO A PAYMENT TO THE SWISS CONFEDERATION IN THE AMOUNT OF CHF20,000, WHICH AMOUNT WAS PAID ON DECEMBER 18, 2015. WHILE THE ACTUAL PAYMENT WAS MADE IN SWISS FRANCS, USING THE MOST RECENTLY PUBLISHED FEDERAL RESERVE FOREIGN EXCHANGE RATE OF CHF0.9828:USD1 AS OF DECEMBER 11, 2015, THE EQUIVALENT U.S. DOLLAR VALUE ON DECEMBER 11, 2015 WAS \$20,350.02, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.

Firm Statement WITHOUT ADMITTING ANY INTENTIONAL INFRINGEMENT OF SESTA ARTICLES OR WRONGDOING, GS GROUP ENTERED INTO A SETTLEMENT AGREEMENT WITH FDF ON DECEMBER 8, 2015, AND CONSENTED TO A PAYMENT TO THE SWISS CONFEDERATION IN THE AMOUNT OF CHF20,000, WHICH AMOUNT WAS PAID ON DECEMBER 18, 2015.



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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	ICE CLEAR CREDIT, LLC ("ICC") ALLEGED THAT DURING THE MONTH OF SEPTEMBER 2015, GOLDMAN SACHS INTERNATIONAL ("GSI") FAILED TO SUBMIT SEVEN (7) INDEX END OF DAY PRICES IN ACCORDANCE WITH ICC RULES AND PROCEDURES, IN ALLEGED VIOLATION OF ICC RULE 404(B).
Initiated By:	ICE CLEAR CREDIT LLC
Date Initiated:	10/06/2015
Docket/Case Number:	2015-404B-038
Principal Product Type:	Derivative(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	10/19/2015
Sanctions Ordered:	Monetary/Fine \$7,000.00
Other Sanctions Ordered:	
Sanction Details:	ICC MADE A SUMMARY ASSESSMENT AGAINST GSI IN THE AMOUNT OF \$7,000, WHICH AMOUNT IS DIRECT DEBITED IN THE NEXT ICC MONTHLY CLEARING FEE INVOICE.
Firm Statement	ICC MADE A SUMMARY ASSESSMENT AGAINST GSI IN THE AMOUNT OF \$7,000, WHICH AMOUNT IS DIRECT DEBITED IN THE NEXT ICC MONTHLY CLEARING FEE INVOICE.

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Reporting Source:	Firm
Affiliate:	J. ARON & COMPANY
Current Status:	Final



Allegations:	AN ICE FUTURES U.S., INC. ("IFUS") SUBCOMMITTEE OF THE BUSINESS CONDUCT COMMITTEE (THE "BCC SUBCOMMITTEE") DETERMINED THAT J. ARON & COMPANY ("J. ARON") MAY HAVE VIOLATED IFUS RULE 6.20(B) IN ONE (1) INSTANCE BY CARRYING A POSITION IN EXCESS OF APPLICABLE SPOT MONTH POSITION LIMITS.
Initiated By:	ICE FUTURES U.S., INC.
Date Initiated:	08/11/2015
Docket/Case Number:	2014-111
Principal Product Type:	Derivative(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Consent
Resolution Date:	08/11/2015
Sanctions Ordered:	Monetary/Fine \$35,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING ANY VIOLATION OF IFUS RULES, J. ARON CONSENTED TO A FINE IN THE AMOUNT OF \$35,000, WHICH WAS PAID BY SUBMISSION OF A WIRE ON SEPTEMBER 2, 2015.
Firm Statement	WITHOUT ADMITTING OR DENYING ANY VIOLATION OF IFUS RULES, J. ARON ENTERED INTO A SETTLEMENT AGREEMENT, WHICH WAS APPROVED BY THE BCC SUBCOMMITTEE, IN WHICH J. ARON: (I) AGREED TO CEASE AND DESIST FROM FUTURE VIOLATIONS OF IFUS RULE 6.20(B); AND (II) CONSENTED TO A FINE IN THE AMOUNT OF \$35,000, WHICH WAS PAID BY SUBMISSION OF A WIRE ON SEPTEMBER 2, 2015.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	THE FEDERAL FINANCIAL SUPERVISORY AUTHORITY OF GERMANY (BUNDESANSTALT FÜR FINANZDIENSTLEISTUNGSAUFSICHT - "BAFIN")



ALLEGED CERTAIN BREACHES BY GOLDMAN SACHS INTERNATIONAL ("GSI") OF THE OWNERSHIP THRESHOLD NOTIFICATION REQUIREMENTS OF SECTIONS 21, 25 AND 25A OF THE GERMAN SECURITIES TRADING ACT (WERTPAPIERHANDELSGESETZ - "WPHG").

Initiated By:	FEDERAL FINANCIAL SUPERVISORY AUTHORITY OF GERMANY
Date Initiated:	08/12/2015
Docket/Case Number:	WA 17-WP 3120-2012/0035 - 3121-2014/0027
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	11/23/2015
Sanctions Ordered:	Monetary/Fine \$1,218,475.35
Other Sanctions Ordered:	
Sanction Details:	BAFIN IMPOSED A MONETARY PENALTY ON GSI OF 1,107,503.50 EUROS IN THE AGGREGATE, REPRESENTING AN ADMINISTRATIVE FINE OF 1,100,000 EUROS AND PROCEDURAL EXPENSES OF 7,503.50 EUROS, WHICH AMOUNT WAS PAID ON DECEMBER 18, 2015. WHILE THE ACTUAL PAYMENT WAS MADE IN EUROS, USING THE MOST RECENTLY PUBLISHED FEDERAL RESERVE FOREIGN EXCHANGE RATE OF EUR1:USD1.1002 AS OF DECEMBER 11, 2015, THE EQUIVALENT US DOLLAR VALUE ON DECEMBER 11, 2015 WAS \$1,218,475.35, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.
Firm Statement	BAFIN IMPOSED A MONETARY PENALTY ON GSI OF 1,107,503.50 EUROS IN THE AGGREGATE, REPRESENTING AN ADMINISTRATIVE FINE OF 1,100,000 EUROS AND PROCEDURAL EXPENSES OF 7,503.50 EUROS, WHICH AMOUNT WAS PAID ON DECEMBER 18, 2015.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS DO BRASIL BANCO MÚLTIPLO S.A.
Current Status:	Final



Allegations:	ANBIMA - ASSOCIAÇÃO BRASILEIRA DAS ENTIDADES DOS MERCADOS FINANCEIRO E DE CAPITAIS ("ANBIMA") FILED A PROCEEDING FOR INVESTIGATION OF IRREGULARITIES ("PAI") TO INVESTIGATE WHETHER GOLDMAN SACHS DO BRASIL BANCO MÚLTIPLO S.A. ("GSBR") MAY HAVE VIOLATED ARTICLE 27, PARAGRAPH 3, V OF THE ANBIMA CODE OF REGULATION AND BEST PRACTICES TO INVESTMENT FUNDS (CÓDIGO ANBIMA DE REGULAÇÃO E MELHORES PRÁTICAS PARA FUNDOS DE INVESTIMENTO, "ANBIMA'S CODE OF FUNDS") IN CONNECTION WITH GSBR'S TAX TREATMENT OF PAYMENTS OF INTEREST ON CAPITAL IN CONNECTION WITH STOCK LENDING TRADES INVOLVING A BRAZILIAN INVESTMENT FUND MANAGED BY GSBR (THE "FUND").
Initiated By:	ANBIMA - ASSOCIAÇÃO BRASILEIRA DAS ENTIDADES DOS MERCADOS FINANCEIRO E DE CAPITAIS
Date Initiated:	07/22/2015
Docket/Case Number:	005/2015
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	UNDERTAKING
Resolution:	Settled
Resolution Date:	07/22/2015
Sanctions Ordered:	Monetary/Fine \$144,982.17
Other Sanctions Ordered:	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION, ANBIMA AND GSBR ENTERED INTO A SETTLEMENT AGREEMENT ON JULY 22, 2015, IN WHICH GSBR AGREED TO: (I) ENSURE FULL COMPLIANCE WITH ALL PROVISIONS OF THE ANBIMA'S CODE OF FUNDS, SPECIFICALLY WITH RESPECT TO MATTERS RELATING TO THE PAI; (II) ADOPT ADDITIONAL INTERNAL CONTROLS RELATING TO GOVERNANCE AND MANAGEMENT OF THE FUND AND CONDUCT RELATED TRAINING WITH SUBMISSION TO ANBIMA OF A LIST OF ATTENDEES OF THE TRAINING ONCE COMPLETED; (III) REFRAIN FROM PREPARATION OF ANY MATERIAL FOR DISTRIBUTION, SOLICITATION, ADVERTISEMENT OR ANY OTHER MATERIAL INTENDED TO SOLICIT NEW SHAREHOLDERS FOR THE FUND; AND (IV) REFRAIN FROM USING THE FUND'S PERFORMANCE TRACK RECORD IN THE MARKETING MATERIAL OF ANY OTHER FUND MANAGED BY GSBR FOR A PERIOD OF TWELVE (12) MONTHS.

**Sanction Details:**

GSBR AGREED TO MAKE A FINANCIAL PAYMENT TO ANBIMA IN THE AMOUNT OF FIVE HUNDRED THOUSAND REAIS (BRL\$500,000.00), WHICH AMOUNT WAS PAID BY GSBR ON AUGUST 3, 2015. WHILE THE ACTUAL PAYMENT WAS MADE IN BRAZILIAN REAIS, USING THE MOST RECENTLY PUBLISHED FEDERAL RESERVE FOREIGN EXCHANGE RATE OF BRL\$3.4487:USD\$1 AS OF AUGUST 3, 2015, THE EQUIVALENT U.S. DOLLAR VALUE ON AUGUST 3, 2015 WAS USD\$144,982.17, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.

Firm Statement

WITHOUT ADMITTING OR DENYING THE RULE VIOLATION, ANBIMA AND GSBR ENTERED INTO A SETTLEMENT AGREEMENT ON JULY 22, 2015, IN WHICH GSBR AGREED TO: (I) ENSURE FULL COMPLIANCE WITH ALL PROVISIONS OF THE ANBIMA'S CODE OF FUNDS, SPECIFICALLY WITH RESPECT TO MATTERS RELATING TO THE PAI; (II) ADOPT ADDITIONAL INTERNAL CONTROLS RELATING TO GOVERNANCE AND MANAGEMENT OF THE FUND AND CONDUCT RELATED TRAINING WITH SUBMISSION TO ANBIMA OF A LIST OF ATTENDEES OF THE TRAINING ONCE COMPLETED; (III) REFRAIN FROM PREPARATION OF ANY MATERIAL FOR DISTRIBUTION, SOLICITATION, ADVERTISEMENT OR ANY OTHER MATERIAL INTENDED TO SOLICIT NEW SHAREHOLDERS FOR THE FUND; AND (IV) REFRAIN FROM USING THE FUND'S PERFORMANCE TRACK RECORD IN THE MARKETING MATERIAL OF ANY OTHER FUND MANAGED BY GSBR FOR A PERIOD OF TWELVE (12) MONTHS. IN ADDITION, GSBR AGREED TO MAKE A FINANCIAL PAYMENT TO ANBIMA IN THE AMOUNT OF FIVE HUNDRED THOUSAND REAIS (BRL\$500,000.00), WHICH AMOUNT WAS PAID BY GSBR ON AUGUST 3, 2015.

Disclosure 56 of 82**Reporting Source:**

Firm

Affiliate:

GOLDMAN SACHS INTERNATIONAL

Current Status:

Final

Allegations:

AKK - ÁLLAMADÓSSÁG KEZELO KÖZPONT ZÁRTKÖRÜEN MUKÖDO RÉSZVÉNYTÁRSASÁG ALLEGED THAT DURING THE MONTH OF JUNE 2015, GOLDMAN SACHS INTERNATIONAL ("GSI") FAILED TO MEET PRIMARY DEALER QUOTING OBLIGATIONS IN ACCORDANCE WITH THE AGENCY CONTRACT BETWEEN GSI AND AKK AND THE RELEVANT MARKET MAKING RULES.

Initiated By:

AKK - ÁLLAMADÓSSÁG KEZELO KÖZPONT ZÁRTKÖRÜEN MUKÖDO RÉSZVÉNYTÁRSASÁG

Date Initiated:

07/20/2015

Docket/Case Number:



Principal Product Type:	Debt - Government
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	07/20/2015
Sanctions Ordered:	Monetary/Fine \$1,794.90
Other Sanctions Ordered:	
Sanction Details:	THE AKK IMPOSED A FINE ON GSI IN THE AMOUNT OF HUF\$500,000, WHICH WAS PAID BY SUBMISSION OF A WIRE ON AUGUST 13, 2015. WHILE THE ACTUAL PAYMENT WAS MADE IN HUNGARIAN FORINTS, USING THE FOREIGN EXCHANGE SPOT RATE OF HUF\$0.0035898:USD\$1 AS OF AUGUST 13, 2015, THE EQUIVALENT U.S. DOLLAR VALUE ON AUGUST 13, 2015 WAS USD\$1794.90, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.
Firm Statement	THE AKK IMPOSED A FINE ON GSI IN THE AMOUNT OF HUF\$500,000, WHICH WAS PAID BY SUBMISSION OF A WIRE ON AUGUST 13, 2015.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	ICE CLEAR CREDIT LLC ("ICC") ALLEGED THAT DURING THE MONTH OF JUNE 2015, GOLDMAN SACHS INTERNATIONAL ("GSI") FAILED TO SUBMIT CERTAIN SINGLE NAME END OF DAY PRICES AND CERTAIN INDEX PRICES IN ACCORDANCE WITH ICC RULES AND PROCEDURES, IN ALLEGED VIOLATION OF ICC RULE 404(B).
Initiated By:	ICE CLEAR CREDIT LLC
Date Initiated:	07/08/2015
Docket/Case Number:	2015-404B-021
Principal Product Type:	Derivative(s)
Other Product Type(s):	



Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	07/14/2015
Sanctions Ordered:	Monetary/Fine \$127,000.00
Other Sanctions Ordered:	
Sanction Details:	ICC MADE A SUMMARY ASSESSMENT AGAINST GSI IN THE AMOUNT OF \$127,000, WHICH AMOUNT WAS DIRECT DEBITED IN AN ICC MONTHLY CLEARING FEE INVOICE.
Firm Statement	ICC MADE A SUMMARY ASSESSMENT AGAINST GSI IN THE AMOUNT OF \$127,000, WHICH AMOUNT WAS DIRECT DEBITED IN AN ICC MONTHLY CLEARING FEE INVOICE.

Disclosure 58 of 82

Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS SAUDI ARABIA
Current Status:	Final
Allegations:	IN A LETTER DATED JUNE 17, 2015 TO GOLDMAN SACHS SAUDI ARABIA ("GSSA") FROM THE KINGDOM OF SAUDI ARABIA CAPITAL MARKET AUTHORITY (THE "CMA"), THE CMA INFORMED GSSA OF A CMA DECISION ALLEGING THAT GSSA WAS LATE IN NOTIFYING THE CMA OF THE RESIGNATION OF GSSA'S CHIEF EXECUTIVE OFFICER, IN ALLEGED VIOLATION OF ARTICLE 15 PARAGRAPH A OF THE CMA LICENSEES REGULATIONS.
Initiated By:	CAPITAL MARKET AUTHORITY OF THE KINGDOM OF SAUDI ARABIA
Date Initiated:	06/17/2015
Docket/Case Number:	161/4/2015
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)



Other Sanction(s)/Relief Sought:

Resolution:	Decision
Resolution Date:	06/17/2015
Sanctions Ordered:	Monetary/Fine \$2,666.35
Other Sanctions Ordered:	THE CMA'S DECISION STIPULATED THE NEED FOR GSSA TO DISCUSS THE MATTER OF THE VIOLATION AT THE NEXT MEETING OF THE BOARD OF DIRECTORS OF GSSA AND TO NOTIFY THE CMA OF THE BOARD'S RESPONSE IN THIS REGARD.
Sanction Details:	GSSA AGREED TO THE PAYMENT OF A FINANCIAL PENALTY TO THE CMA IN THE AMOUNT OF 10,000 SAUDI ARABIAN RIYALS (SAR), WHICH WAS PAID BY SUBMISSION OF A WIRE ON JULY 5, 2015. WHILE THE ACTUAL PAYMENT WAS MADE IN SAUDI ARABIAN RIYALS, USING THE FOREIGN EXCHANGE SPOT RATE OF SAR1:USD0.2666347 AS OF JULY 6, 2015, THE EQUIVALENT U.S. DOLLAR VALUE ON JULY 5, 2015 WAS US\$2,666.35, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.
Firm Statement	GSSA AGREED TO THE PAYMENT OF A FINANCIAL PENALTY TO THE CMA IN THE AMOUNT OF 10,000 SAUDI ARABIAN RIYALS (SAR), WHICH WAS PAID BY SUBMISSION OF A WIRE ON JULY 5, 2015. THE CMA'S DECISION STIPULATED THE NEED FOR GSSA TO DISCUSS THE MATTER OF THE VIOLATION AT THE NEXT MEETING OF THE BOARD OF DIRECTORS OF GSSA AND TO NOTIFY THE CMA OF THE BOARD'S RESPONSE IN THIS REGARD.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS DO BRASIL BANCO MULTIPLO S.A.
Current Status:	Final
Allegations:	ANBIMA - ASSOCIAÇÃO BRASILEIRA DAS ENTIDADES DOS MERCADOS FINANCEIRO E DE CAPITAIS ("ANBIMA") ALLEGED THAT, CERTAIN BRAZILIAN FINANCIAL INSTITUTIONS, INCLUDING GOLDMAN SACHS DO BRASIL BANCO MÚLTIPLO S.A. ("OFFERING COORDINATORS") ACTING IN A PUBLIC OFFERING (THE "OFFERING") OF EQUITY SECURITIES OF THE BRAZILIAN ISSUER OI S.A. (THE "ISSUER"), FAILED TO APPROPRIATELY DISCLOSE CERTAIN RELATIONSHIPS IN THE OFFERING MATERIALS ASSOCIATED WITH CERTAIN OFFERING COORDINATORS BEING CREDITORS AND SECURITY HOLDERS



OF THE ISSUER WHO USED PART OF THE PROCEEDS FROM THE OFFERING TO AMORTIZE SUCH LOANS (PARTIALLY OR TOTALLY), IN ALLEGED CONTRAVENTION OF ARTICLE 10 OF THE ANBIMA CODE OF REGULATION AND BEST PRACTICES TO PUBLIC OFFERINGS (CÓDIGO ANBIMA DE REGULAÇÃO E MELHORES PRÁTICAS PARA OFERTAS PÚBLICAS DE DISTRIBUIÇÃO E AQUISIÇÃO DE VALORES MOBILIÁRIOS, "ANBIMA'S CODE").

Initiated By: ANBIMA - ASSOCIAÇÃO BRASILEIRA DAS ENTIDADES DOS MERCADOS FINANCEIRO E DE CAPITAIS

Date Initiated: 03/18/2015

Docket/Case Number:

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 03/18/2015

Sanctions Ordered: Monetary/Fine \$6,137.87

Other Sanctions Ordered:

Sanction Details: ANBIMA AND THE OFFERING COORDINATORS ENTERED INTO A SETTLEMENT AGREEMENT ON MARCH 18, 2015, IN WHICH THE OFFERING COORDINATORS AGREED TO PREPARE EDUCATIONAL MATERIAL AND SCHEDULE INTERNAL WORKSHOPS TO BE PRESENTED BY REPRESENTATIVES FROM ANBIMA TO THE INVESTMENT BANKING TEAM OF EACH OFFERING COORDINATOR ON THE RULES OF ANBIMA'S CODE. IN ADDITION, THE OFFERING COORDINATORS AGREED TO A FINANCIAL PAYMENT TO ANBIMA, GOLDMAN SACHS DO BRASIL BANCO MÚLTIPLO S.A.'S PORTION OF WHICH WAS BRL\$18,894.83, WHICH AMOUNT WILL BE PAID BY GOLDMAN SACHS DO BRASIL BANCO MÚLTIPLO S.A. UPON RECEIPT OF AN INVOICE. WHILE THE ACTUAL PAYMENT WILL BE MADE IN BRAZILIAN REAIS, USING THE MOST RECENTLY PUBLISHED FEDERAL RESERVE FOREIGN EXCHANGE RATE OF BRL\$3.0784:USD\$1 AS OF APRIL 10, 2015, THE EQUIVALENT U.S. DOLLAR VALUE ON APRIL 10, 2015 WAS USD\$6,137.87,



WHICH AMOUNT IS REFLECTED IN ITEM 12.A.
ABOVE.

Firm Statement

ANBIMA AND THE OFFERING COORDINATORS ENTERED INTO A SETTLEMENT AGREEMENT ON MARCH 18, 2015, IN WHICH THE OFFERING COORDINATORS AGREED TO PREPARE AN EDUCATIONAL MATERIAL AND SCHEDULE INTERNAL WORKSHOPS TO BE PRESENTED BY REPRESENTATIVES FROM ANBIMA TO THE INVESTMENT BANKING TEAM OF EACH OFFERING COORDINATOR ON THE RULES OF ANBIMA'S CODE. IN ADDITION, THE OFFERING COORDINATORS AGREED TO A FINANCIAL PAYMENT TO ANBIMA, GOLDMAN SACHS DO BRASIL BANCO MÚLTIPLO S.A.'S PORTION OF WHICH WAS BRL\$18,894.83, WHICH AMOUNT WILL BE PAID BY GOLDMAN SACHS DO BRASIL BANCO MÚLTIPLO S.A. UPON RECEIPT OF AN INVOICE.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS MÉXICO, CASA DE BOLSA, S.A. DE C.V.
Current Status:	Final
Allegations:	ON FEBRUARY 17, 2015, THE MEXICAN NATIONAL BANKING AND SECURITIES COMMISSION NOTIFIED GOLDMAN SACHS MÉXICO, CASA DE BOLSA, S.A. DE C.V. ("GS MEXICO") OF ITS DECISION TO IMPOSE AN ADMINISTRATIVE PENALTY FOR THE FAILURE BY GS MEXICO TO TIMELY FILE A QUARTERLY REPORT OF U.S. DOLLAR CASH TRANSACTIONS EFFECTED DURING THE FIRST QUARTER OF 2014 IN ACCORDANCE WITH SECTION 35 OF THE NEW GENERAL GUIDELINES TO ARTICLE 212 OF THE MEXICAN SECURITIES MARKET LAW (NUEVAS DISPOSICIONES DE CARÁCTER GENERAL A QUE SE REFIERE EL ARTÍCULO 212 DE LA LEY DEL MERCADO DE VALORES).
Initiated By:	COMISIÓN NACIONAL BANCARIA Y DE VALORES OF THE UNITED MEXICAN STATES (MEXICAN NATIONAL BANKING AND SECURITIES COMMISSION)
Date Initiated:	02/17/2015
Docket/Case Number:	211/21378/2015
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)


Other Sanction(s)/Relief Sought:

Resolution: Decision

Resolution Date: 02/17/2015

Sanctions Ordered: Monetary/Fine \$17,274.33

Other Sanctions Ordered:

Sanction Details: THE MEXICAN NATIONAL BANKING AND SECURITIES COMMISSION IMPOSED AN ADMINISTRATIVE FINANCIAL PENALTY ON GS MEXICO IN THE AMOUNT OF MXN\$269,160 IN THE AGGREGATE, WHICH AMOUNT WAS PAID BY SUBMISSION OF A WIRE ON MARCH 10, 2015. WHILE THE ACTUAL PAYMENT WAS MADE IN MEXICAN PESOS, USING THE FEDERAL RESERVE FOREIGN EXCHANGE RATE OF MXN\$15.5815:USD\$1 AS OF MARCH 10, 2015, THE EQUIVALENT U.S. DOLLAR VALUE ON MARCH 10, 2015 WAS USD\$17,274.33, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.

Firm Statement THE MEXICAN NATIONAL BANKING AND SECURITIES COMMISSION IMPOSED AN ADMINISTRATIVE FINANCIAL PENALTY ON GS MEXICO IN THE AMOUNT OF MXN\$269,160, WHICH AMOUNT WAS PAID BY SUBMISSION OF A WIRE ON MARCH 10, 2015.

Disclosure 61 of 82

Reporting Source: Firm

Affiliate: J. ARON & COMPANY

Current Status: Final

Allegations: ICE FUTURES U.S., INC. ("IFUS") BUSINESS CONDUCT COMMITTEE ("BCC") DETERMINED THAT J. ARON & COMPANY ("J. ARON") MAY HAVE, IN ONE (1) INSTANCE, EXCEEDED THE SPOT MONTH SPECULATIVE POSITION LIMIT ESTABLISHED BY IFUS IN AN ENERGY FUTURES CONTRACT DURING CONTRACT EXPIRATION, IN ALLEGED VIOLATION OF IFUS RULE 6.20(B).

Initiated By: ICE FUTURES U.S., INC.

Date Initiated: 11/24/2014

Docket/Case Number: 2013-155

Principal Product Type: Derivative(s)

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)



Other Sanction(s)/Relief Sought:	CEASE AND DESIST; DISGORGEMENT
Resolution:	Consent
Resolution Date:	11/24/2014
Sanctions Ordered:	Monetary/Fine \$20,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING ANY VIOLATION OF IFUS RULES, J. ARON CONSENTED TO A MONETARY PAYMENT OF \$82,064 IN THE AGGREGATE, CONSISTING OF A FINE IN THE AMOUNT OF \$20,000, AND DISGORGEMENT OF PROFITS IN THE AMOUNT OF \$62,064, BOTH OF WHICH WERE PAID BY SUBMISSION OF A WIRE ON NOVEMBER 26, 2014.
Firm Statement	WITHOUT ADMITTING OR DENYING ANY VIOLATION OF IFUS RULES, J. ARON ENTERED INTO A SETTLEMENT AGREEMENT, WHICH WAS APPROVED BY THE BCC, IN WHICH J. ARON: (I) AGREED TO CEASE AND DESIST FROM FUTURE VIOLATIONS OF IFUS RULE 6.20(B); AND (II) CONSENTED TO A MONETARY PAYMENT OF \$82,064 IN THE AGGREGATE, CONSISTING OF A FINE IN THE AMOUNT OF \$20,000, AND DISGORGEMENT OF PROFITS IN THE AMOUNT OF \$62,064, BOTH OF WHICH WERE PAID BY SUBMISSION OF A WIRE ON NOVEMBER 26, 2014.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	THE FEDERAL DEPARTMENT OF FINANCE ("FDF") OF THE SWISS CONFEDERATION ALLEGED THAT GOLDMAN SACHS INTERNATIONAL ("GSI") WAS LATE IN PUBLISHING A DROP BELOW A NOTIFIABLE THRESHOLD IN THE FIRM'S HOLDINGS IN A QUALIFIED INTEREST IN CERTAIN SECURITIES IN THE PERIOD BETWEEN SEPTEMBER 25, 2012, AND DECEMBER 20, 2012, IN ALLEGED INFRINGEMENT OF ARTICLE 41 OF THE SWISS FEDERAL ACT ON STOCK EXCHANGES AND SECURITIES TRADING (SESTA).
Initiated By:	SWISS FEDERAL DEPARTMENT OF FINANCE
Date Initiated:	10/27/2014



Docket/Case Number:	442.2-126
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	REPARATION PAYMENT
Resolution:	Consent
Resolution Date:	10/27/2014
Sanctions Ordered:	Monetary/Fine \$20,842.02
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING ANY INTENTIONAL INFRINGEMENT OF SESTA ARTICLES OR WRONGDOING, GSI CONSENTED TO A PAYMENT TO THE SWISS CONFEDERATION IN THE AMOUNT OF CHF20,000, WHICH AMOUNT WAS PAID ON NOVEMBER 4, 2014. WHILE THE ACTUAL PAYMENT WAS MADE IN SWISS FRANCS, USING THE FEDERAL RESERVE FOREIGN EXCHANGE RATE OF CHF1:USD0.9596 AS OF NOVEMBER 4, 2014, THE EQUIVALENT U.S. DOLLAR VALUE ON NOVEMBER 4, 2014 WAS \$20,842.02, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.
Firm Statement	WITHOUT ADMITTING ANY INTENTIONAL INFRINGEMENT OF SESTA ARTICLES OR WRONGDOING, GSI ENTERED INTO A SETTLEMENT AGREEMENT WITH FDF ON OCTOBER 27, 2014, AND CONSENTED TO A PAYMENT TO THE SWISS CONFEDERATION IN THE AMOUNT OF CHF20,000, WHICH AMOUNT WAS PAID ON NOVEMBER 4, 2014.

Disclosure 63 of 82

Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	ICE CLEAR CREDIT, LLC ("ICE") ALLEGED THAT DURING THE MONTH OF SEPTEMBER, 2014, GOLDMAN SACHS INTERNATIONAL ("GSI") FAILED TO SUBMIT FIFTY-FOUR (54) SINGLE NAME END OF DAY PRICES IN ACCORDANCE WITH ICE RULES AND PROCEDURES, IN ALLEGED VIOLATION OF ICE RULE 404(B).
Initiated By:	ICE CLEAR CREDIT LLC



Date Initiated: 11/12/2014

Docket/Case Number: 2014-404B-025

Principal Product Type: Derivative(s)

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution: Decision

Resolution Date: 11/12/2014

Sanctions Ordered: Monetary/Fine \$20,000.00

Other Sanctions Ordered:

Sanction Details: ICE MADE A SUMMARY ASSESSMENT AGAINST GSI IN THE AMOUNT OF \$20,000, WHICH WAS FINALIZED BY NOTICE DATED NOVEMBER 12, 2014. THE ASSESSMENT AMOUNT IS EXPECTED TO BE BILLED IN AN ICE MONTHLY CLEARING FEE INVOICE, AND WILL BE PAID UPON RECEIPT.

Firm Statement ICE MADE A SUMMARY ASSESSMENT AGAINST GSI IN THE AMOUNT OF \$20,000, WHICH WAS FINALIZED BY NOTICE DATED NOVEMBER 12, 2014. THE ASSESSMENT AMOUNT IS EXPECTED TO BE BILLED IN AN ICE MONTHLY CLEARING FEE INVOICE, AND WILL BE PAID UPON RECEIPT.

Disclosure 64 of 82

Reporting Source: Firm

Affiliate: GOLDMAN SACHS INTERNATIONAL

Current Status: Final

Allegations: ICE CLEAR CREDIT, LLC ("ICE") ALLEGED THAT DURING THE MONTH OF MAY, 2014, GOLDMAN SACHS INTERNATIONAL ("GSI") FAILED TO SUBMIT SEVENTY-TWO (72) SINGLE NAME AND EIGHT (8) INDEX END OF DAY PRICES IN ACCORDANCE WITH ICE RULES AND PROCEDURES, IN ALLEGED VIOLATION OF ICE RULE 404(B).

Initiated By: ICE CLEAR CREDIT LLC

Date Initiated: 06/09/2014



Docket/Case Number: 2014-404B-007

Principal Product Type: Derivative(s)

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 06/24/2014

Sanctions Ordered: Monetary/Fine \$18,000.00

Other Sanctions Ordered:

Sanction Details: ICE MADE A SUMMARY ASSESSMENT AGAINST GSI IN THE AMOUNT OF \$18,000. THE ASSESSMENT AMOUNT WAS BILLED IN AN ICE MONTHLY CLEARING FEE INVOICE, AND WAS PAID ON JULY 17, 2014.

Firm Statement ICE MADE A SUMMARY ASSESSMENT AGAINST GSI IN THE AMOUNT OF \$18,000. THE ASSESSMENT AMOUNT WAS BILLED IN AN ICE MONTHLY CLEARING FEE INVOICE, AND WAS PAID ON JULY 17, 2014.

Disclosure 65 of 82

Reporting Source: Firm

Affiliate: GOLDMAN SACHS INTERNATIONAL

Current Status: Final

Allegations: ICE CLEAR CREDIT, LLC ("ICE") ALLEGED THAT DURING THE MONTH OF DECEMBER, 2013, GOLDMAN SACHS INTERNATIONAL ("GSI") FAILED TO SUBMIT SEVENTY-TWO (72) SINGLE NAME END OF DAY PRICES IN ACCORDANCE WITH ICE RULES AND PROCEDURES, IN ALLEGED VIOLATION OF ICE RULE 404(B).

Initiated By: ICE CLEAR CREDIT LLC

Date Initiated: 01/03/2014

Docket/Case Number: 2013-404B-57

Principal Product Type: Derivative(s)

Other Product Type(s):



Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	01/31/2014
Sanctions Ordered:	Monetary/Fine \$10,000.00
Other Sanctions Ordered:	
Sanction Details:	ICE MADE A SUMMARY ASSESSMENT AGAINST GSI IN THE AMOUNT OF \$10,000, WHICH WAS BILLED IN AN ICE MONTHLY CLEARING FEE INVOICE DATED JANUARY 31, 2014, AND PAID ON FEBRUARY 20, 2014.
Firm Statement	ICE MADE A SUMMARY ASSESSMENT AGAINST GSI IN THE AMOUNT OF \$10,000, WHICH WAS BILLED IN AN ICE MONTHLY CLEARING FEE INVOICE DATED JANUARY 31, 2014, AND PAID ON FEBRUARY 20, 2014.

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Reporting Source:	Firm
Affiliate:	J. ARON & COMPANY
Current Status:	Final
Allegations:	CME GROUP, INC. ("CME") MARKET REGULATION FOUND REPORTING INFRACTIONS WITH RESPECT TO J. ARON & COMPANY'S (THE "COMPANY") REPORTING OF CERTAIN BLOCK TRADES, INCLUDING: (I) LATE REPORTING OF CERTAIN BLOCK TRADES TO THE CHICAGO MERCANTILE EXCHANGE DURING MARCH AND APRIL, 2013; (II) ENTERING TRADES INTO THE CME CLEARPORT PLATFORM ON ONE DATE AS OUTRIGHT TRANSACTIONS WHERE IT APPEARED FROM AUDIT TRAIL DOCUMENTS THEY WERE SPREAD TRANSACTIONS AND WITH EXECUTION TIMES NOT SUPPORTED BY SUCH SUPPORTING DOCUMENTS; AND (III) REPORTING A BLOCK TRANSACTION TO THE NEW YORK MERCANTILE EXCHANGE (NYMEX) FACILITATION DESK, WHILE AUDIT TRAIL DOCUMENTS SUGGESTED THAT THE ORDER WAS EXECUTED IN INCREMENTS, EACH IN ALLEGED VIOLATION OF CME RULE 526.F.
Initiated By:	CME GROUP, INC
Date Initiated:	11/11/2013
Docket/Case Number:	RSRH-13-1419-1480-1481



Principal Product Type:	Futures - Commodity
Other Product Type(s):	FUTURES - FINANCIAL / OPTIONS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	11/11/2013
Sanctions Ordered:	Monetary/Fine \$2,500.00
Other Sanctions Ordered:	
Sanction Details:	THE CME IMPOSED A FINE IN THE AMOUNT OF \$2,500, WHICH WAS PAID BY SUBMISSION OF A WIRE ON NOVEMBER 19, 2013.
Firm Statement	THE CME IMPOSED A FINE IN THE AMOUNT OF \$2,500, WHICH WAS PAID BY SUBMISSION OF A WIRE ON NOVEMBER 19, 2013.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	ICE CLEAR CREDIT, LLC ("ICE") ALLEGED THAT DURING THE MONTH OF SEPTEMBER, 2013, GOLDMAN SACHS INTERNATIONAL ("GSI") FAILED TO SUBMIT EIGHTEEN (18) SINGLE NAME END OF DAY PRICES IN ACCORDANCE WITH ICE RULES AND PROCEDURES, IN ALLEGED VIOLATION OF ICE RULE 404(B).
Initiated By:	ICE CLEAR CREDIT LLC
Date Initiated:	10/03/2013
Docket/Case Number:	2013-404B-020
Principal Product Type:	Derivative(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	



Resolution:	Consent
Resolution Date:	11/04/2013
Sanctions Ordered:	Monetary/Fine \$10,000.00
Other Sanctions Ordered:	
Sanction Details:	ICE MADE A SUMMARY ASSESSMENT AGAINST GSI OF \$10,000, WHICH WAS MADE FINAL ON NOVEMBER 4, 2013. THE ASSESSMENT AMOUNT WAS BILLED IN AN ICE MONTHLY CLEARING FEE INVOICE, AND WAS PAID ON NOVEMBER 20, 2013.
Firm Statement	ICE MADE A SUMMARY ASSESSMENT AGAINST GSI OF \$10,000, WHICH WAS MADE FINAL ON NOVEMBER 4, 2013. THE ASSESSMENT AMOUNT WAS BILLED IN AN ICE MONTHLY CLEARING FEE INVOICE, AND WAS PAID ON NOVEMBER 20, 2013.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	ICE CLEAR CREDIT, LLC ("ICE") ALLEGED THAT DURING THE MONTH OF MAY, 2013, GOLDMAN SACHS INTERNATIONAL ("GSI") FAILED TO SUBMIT NINE (9) SINGLE NAME END OF DAY PRICES IN ACCORDANCE WITH ICE RULES AND PROCEDURES, IN ALLEGED VIOLATION OF ICE RULE 404(B).
Initiated By:	ICE CLEAR CREDIT LLC
Date Initiated:	06/06/2013
Docket/Case Number:	2013-404B-008
Principal Product Type:	Derivative(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	07/03/2013
Sanctions Ordered:	Monetary/Fine \$10,000.00

**Other Sanctions Ordered:****Sanction Details:**

ICE MADE A SUMMARY ASSESSMENT AGAINST GSI OF \$10,000, WHICH WAS MADE FINAL ON JULY 3, 2013. THE ASSESSMENT AMOUNT WAS BILLED IN AN ICE MONTHLY CLEARING FEE INVOICE, AND WAS PAID ON JULY 17, 2013.

Firm Statement

ICE MADE A SUMMARY ASSESSMENT AGAINST GSI OF \$10,000, WHICH WAS MADE FINAL ON JULY 3, 2013. THE ASSESSMENT AMOUNT WAS BILLED IN AN ICE MONTHLY CLEARING FEE INVOICE, AND WAS PAID ON JULY 17, 2013.

Disclosure 69 of 82**Reporting Source:**

Firm

Affiliate:

MTGLQ INVESTORS, L.P.

Current Status:

Final

Allegations:

THE STATE OF ILLINOIS DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION, DIVISION OF BANKING (THE "DEPARTMENT"), ALLEGED THAT: (I) IN ITS APPLICATION TO RENEW ITS RESIDENTIAL MORTGAGE LICENSE FOR 2011 AND 2012, MTGLQ INVESTORS, L.P. ("MTGLQ") SUBMITTED DEFICIENT FINANCIAL STATEMENTS, AND (II) MTGLQ DID NOT RESPOND TO NOTICES FROM THE DEPARTMENT NOTIFYING MTGLQ OF THESE DEFICIENCIES AND CERTAIN ADDITIONAL DEFICIENCIES, NOR DID IT OTHERWISE REMEDY THE NOTED DEFICIENCIES. AS A RESULT THE DEPARTMENT ALLEGED THAT MTGLQ VIOLATED SECTIONS 2-2, 2-4(D) & (T), 2-6, 3-2, 3-5, AND 4-5(I)(11) & (17) OF THE ILLINOIS RESIDENTIAL MORTGAGE LICENSE ACT OF 1987 (THE "ACT") AND SECTIONS 1050.320 AND 1050.430 OF THE RULES PROMULGATED UNDER THE ACT.

Initiated By:

ILLINOIS DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION, DIVISION OF BANKING

Date Initiated:

05/23/2012

Docket/Case Number:

2012-MBR-11

Principal Product Type:

No Product

Other Product Type(s):**Principal Sanction(s)/Relief Sought:**

Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

DENIAL; REFUSAL TO RENEW LICENSE



Resolution:	Order
Resolution Date:	05/23/2012
Sanctions Ordered:	Monetary/Fine \$4,500.00 Revocation/Expulsion/Denial
Other Sanctions Ordered:	REFUSAL TO RENEW LICENSE
Sanction Details:	ON MAY 23, 2012, THE DEPARTMENT ENTERED AN ORDER REFUSING TO RENEW LICENSE AND ASSESSING FINE (THE "ORDER"). THE DEPARTMENT REFUSED TO RENEW AND DENIED MTGLQ'S RESIDENTIAL MORTGAGE LICENSE RENEWAL FOR 2012, AND ASSESSED A \$4,500 FINE AGAINST MTGLQ, WHICH WAS PAID BY SUBMISSION OF A CHECK ON OCTOBER 30, 2012. BY ORDER DATED OCTOBER 26, 2012, THE DEPARTMENT RESCINDED THE PRIOR ORDER, AND ACKNOWLEDGED THAT MTGLQ HAS COMPLETED ITS RESIDENTIAL MORTGAGE LICENSE RENEWAL APPLICATION FOR CALENDAR YEAR 2012 AND IS IN COMPLIANCE WITH THE ACT.
Firm Statement	MTGLQ HAS NOT CONDUCTED ANY ACTIVITY REQUIRING THE ILLINOIS LICENSE SINCE MAY 23, 2012 AND REQUESTED THAT THE DEPARTMENT RESCIND THE ORDER AND RENEW ITS LICENSE. BY ORDER DATED OCTOBER 26, 2012, THE DEPARTMENT RESCINDED THE PRIOR ORDER, AND ACKNOWLEDGED THAT MTGLQ HAS COMPLETED ITS RESIDENTIAL MORTGAGE LICENSE RENEWAL APPLICATION FOR CALENDAR YEAR 2012 AND IS IN COMPLIANCE WITH THE ACT.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS SAUDI ARABIA
Current Status:	Final
Allegations:	IN A LETTER DATED AUGUST 7, 2012 TO GOLDMAN SACHS SAUDI ARABIA ("GSSA") FROM THE KINGDOM OF SAUDI ARABIA CAPITAL MARKET AUTHORITY (THE "CMA"), WITH REFERENCE TO THE PERIODIC INSPECTION VISIT PAID TO GSSA BY CMA BETWEEN JANUARY 7, 2012 TO JANUARY 25, 2012, CMA INFORMED GSSA OF A BOARD OF CMA RESOLUTION (THE "RESOLUTION"), ALLEGING: (A) A LACK OF A COMPLIANCE OFFICER AT GSSA FROM AUGUST 14, 2010 TO FEBRUARY 13, 2011; (B) THE LACK OF A BANK ACCOUNT WITH A LOCAL BANK FOR THE PURPOSE OF KEEPING THE FUNDS OF CMA CLIENTS; (C) NON-DISCLOSURE TO A CMA CLIENT OF CERTAIN FEES AND COMMISSIONS CHARGED BEFORE PROVIDING CERTAIN SECURITIES SERVICES TO THE CLIENT; (D) NOT INCLUDING IN THE CUSTODIAN'S AGREEMENT SIGNED



WITH CERTAIN BRANCHES OF GSSA CERTAIN CONDITIONS STATED IN THE PARAGRAPH REFERRED TO; AND (E) NOT SETTING APPROPRIATE MEASURES TO MAINTAIN A CLEAR AND APPROPRIATE DIVISION OF RESPONSIBILITIES AMONG THE MEMBERS OF THE BOARD OF DIRECTORS, PARTNERS OR SENIOR MANAGEMENT OF CMA, IN ALLEGED VIOLATION OF ARTICLES 20(B)(3), 10(C), 46, 89(A) AND 53(A), RESPECTIVELY, OF THE CMA AUTHORIZED PERSONS REGULATIONS.

Initiated By: CAPITAL MARKET AUTHORITY OF SAUDI ARABIA

Date Initiated: 08/07/2012

Docket/Case Number: 7/4498

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 08/07/2012

Sanctions Ordered: Monetary/Fine \$23,999.04

Other Sanctions Ordered: THE RESOLUTION STIPULATED IT IS NECESSARY TO DISCUSS THE MATTER OF VIOLATIONS AT THE NEXT MEETING OF THE BOARD OF DIRECTORS OF GSSA TO SET THE MEASURES AND MECHANISMS REQUIRED TO PREVENT REOCCURRENCE IN THE FUTURE.

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, GSSA AGREED TO THE PAYMENT OF A FINANCIAL PENALTY TO THE CMA IN THE AMOUNT OF 90,000 SAUDI RIYALS (SR), WHICH WAS PAID BY SUBMISSION OF A WIRE ON AUGUST 29, 2012. WHILE THE ACTUAL PAYMENT WAS MADE IN SAUDI RIYALS, USING THE FOREIGN EXCHANGE SPOT RATE OF SR1:US\$0.266656 AS OF AUGUST 29, 2012, THE EQUIVALENT US DOLLAR VALUE ON AUGUST 29, 2012 WAS US\$23,999.04, WHICH IS THE AMOUNT REFLECTED IN ITEM 12.A. ABOVE.

Firm Statement WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, GSSA AGREED TO THE PAYMENT OF A FINANCIAL PENALTY TO THE CMA IN THE AMOUNT OF 90,000 SAUDI RIYALS (SR), WHICH WAS PAID BY SUBMISSION OF A WIRE ON AUGUST 29, 2012. THE RESOLUTION STIPULATED IT IS NECESSARY TO DISCUSS THE MATTER OF VIOLATIONS AT THE NEXT MEETING OF THE BOARD OF DIRECTORS OF GSSA TO SET THE MEASURES AND MECHANISMS REQUIRED TO PREVENT REOCCURRENCE IN THE FUTURE.



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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	ICE CLEAR CREDIT, LLC ("ICE") ALLEGED THAT DURING THE MONTH OF MARCH, 2012, GOLDMAN SACHS INTERNATIONAL ("GSI") FAILED TO SUBMIT SEVENTY-TWO SINGLE NAME END OF DAY PRICES IN ACCORDANCE WITH ICE RULES AND PROCEDURES, IN ALLEGED VIOLATION OF ICE RULE 404(B).
Initiated By:	ICE CLEAR CREDIT LLC
Date Initiated:	04/13/2012
Docket/Case Number:	2012-404B-017
Principal Product Type:	Derivative(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	05/21/2012
Sanctions Ordered:	Monetary/Fine \$40,000.00
Other Sanctions Ordered:	
Sanction Details:	ICE MADE A SUMMARY ASSESSMENT AGAINST GSI OF \$40,000, WHICH WAS MADE FINAL ON MAY 21, 2012. THE ASSESSMENT AMOUNT WAS BILLED IN AN ICE MONTHLY CLEARING FEE INVOICE, AND WAS PAID BY SUBMISSION OF A WIRE ON JUNE 7, 2012.
Firm Statement	ICE MADE A SUMMARY ASSESSMENT AGAINST GSI OF \$40,000, WHICH WAS MADE FINAL ON MAY 21, 2012. THE ASSESSMENT AMOUNT WAS BILLED IN AN ICE MONTHLY CLEARING FEE INVOICE, AND WAS PAID BY SUBMISSION OF A WIRE ON JUNE 7, 2012.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS STRUCTURED PRODUCTS (ASIA) LIMITED
Current Status:	Final
Allegations:	IN A LETTER TO GOLDMAN SACHS STRUCTURED PRODUCTS (ASIA) LIMITED ("GSSPA") DATED FEBRUARY 8, 2012, THE STOCK EXCHANGE OF HONG KONG LIMITED ("HKEX") LISTING DIVISION (THE "DIVISION") INFORMED GSSPA THAT, HAVING REVIEWED CERTAIN FACTS AND CIRCUMSTANCES REGARDING FOUR NIKKEI LINKED WARRANTS ISSUED BY GSSPA ON FEBRUARY 17, 2011 (THE "WARRANTS"), THE DIVISION WAS OF THE VIEW THAT GSSPA HAD BREACHED CERTAIN PROVISIONS IN THE LISTING AGREEMENT BETWEEN GSSPA AND HKEX (THE "LISTING AGREEMENT") AND THE HKEX LISTING RULES DUE TO ERRORS IN THE LISTING DOCUMENTATION AND FOR NOT REQUESTING A TRADE SUSPENSION OF THE WARRANTS AS SOON AS REASONABLY PRACTICABLE ON MARCH 31, 2011.
Initiated By:	HONG KONG STOCK EXCHANGE
Date Initiated:	02/08/2012
Docket/Case Number:	
Principal Product Type:	Other
Other Product Type(s):	WARRANTS
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	04/24/2012
Sanctions Ordered:	Censure
Other Sanctions Ordered:	
Sanction Details:	THE DIVISION'S ASSERTIONS WERE REFERRED TO THE HKEX LISTING (DISCIPLINARY) COMMITTEE (THE "COMMITTEE"). WITHOUT ADMITTING OR CONTESTING THE DIVISION'S ASSERTIONS, GSSPA ENTERED INTO A SETTLEMENT AGREEMENT WITH HKEX, WHICH WAS ENDORSED BY THE COMMITTEE ON APRIL 24, 2012, IN WHICH HKEX CENSURED GSSPA FOR HAVING BREACHED CERTAIN PROVISIONS IN THE LISTING AGREEMENT.
Firm Statement	THE DIVISION'S ASSERTIONS WERE REFERRED TO THE COMMITTEE. WITHOUT ADMITTING OR CONTESTING THE DIVISION'S ASSERTIONS,



GSSPA ENTERED INTO A SETTLEMENT AGREEMENT WITH HKEX, WHICH WAS ENDORSED BY THE COMMITTEE ON APRIL 24, 2012, IN WHICH HKEX CENSURED GSSPA FOR HAVING BREACHED CERTAIN PROVISIONS IN THE LISTING AGREEMENT. IN CONSIDERING THE OVERALL SANCTION TO BE IMPOSED ON GSSPA, THE COMMITTEE TOOK INTO ACCOUNT THAT: (I) THIS WAS AN ISOLATED INCIDENT, THERE BEING NO RECORD OF AN EARLIER FAILURE OF THIS NATURE BY GSSPA; (II) THE ERRORS APPEARED TO RESULT FROM HUMAN ERROR RATHER THAN A SYSTEMIC FAILURE; (III) THE WARRANTS HAD, DESPITE CERTAIN ERRORS, TRADED IN ACCORDANCE WITH THEIR INTENDED ECONOMICS FOR A PERIOD OF APPROXIMATELY SIX WEEKS FROM THEIR ISSUANCE PRIOR TO MARCH 31, 2011 WITH NO UNUSUAL PRICE MOVEMENTS; (IV) GSSPA NOTIFIED HKEX OF THE ERRORS PROMPTLY AND PRIOR TO THE OPENING OF THE MARKET ON MARCH 31, 2011, AND THEREAFTER MAINTAINED A FREQUENT AND CANDID DIALOGUE WITH HKEX; (V) GSSPA COOPERATED WITH HKEX, INCLUDING AGREEING TO A TRADING SUSPENSION WHEN THE SUGGESTION WAS MADE BY HKEX ON MARCH 31, 2011; (VI) THERE WAS NO PRECEDENT FOR REQUESTING A SUSPENSION FROM TRADING OF HONG KONG LISTED WARRANTS IN THESE CIRCUMSTANCES; (VII) THE TRADING ACTIVITY THAT RESULTED IN UNUSUAL PRICE MOVEMENT ON MARCH 31, 2011 DID NOT INVOLVE GSSPA AS LIQUIDITY PROVIDER OR IN ANY OTHER CAPACITY; (VIII) GSSPA OFFERED COMPENSATION TO ALL AFFECTED INVESTORS THROUGH A BUYBACK PROGRAM; (IX) GSSPA HAD CERTAIN INTERNAL CONTROLS IN PLACE FOR DOCUMENT REVIEW AT THE RELEVANT TIME AND HAS SINCE IMPLEMENTED REMEDIAL MEASURES ADDRESSING HKEX'S REGULATORY CONCERNS; (X) GSSPA HAS BEEN A VERY ACTIVE PARTICIPANT IN THE WARRANTS INDUSTRY WORKING GROUP FORMED TO CONSIDER ISSUES, INCLUDING THE STANDARDIZATION OF DOCUMENTATION, SO AS TO ENSURE THE CONTINUING SUCCESS AND HIGH STANDARDS OF THE HONG KONG WARRANTS MARKET; (XI) GSSPA VOLUNTARILY WITHDREW FROM ISSUING NEW WARRANTS FROM APRIL TO NOVEMBER 2011 AND FOCUSED ON RESOLVING THIS INCIDENT; AND (XII) GSSPA FULLY COOPERATED WITH THE DIVISION THROUGHOUT ITS INVESTIGATION AND HAS A CLEAN DISCIPLINARY RECORD.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	PURSUANT TO SETTLEMENT PROCEEDINGS, NYSE EURONEXT LIFFE ("LIFFE") MARKET SERVICES, LONDON ("MSL") ALLEGED THAT ON



FEBRUARY 19, 2008, GOLDMAN SACHS INTERNATIONAL ("GSI"), THROUGH THE AGENCY OF AN UNREGISTERED INDIVIDUAL, PROCURED MATCHING BUSINESS FOR TWO CLIENT ORDERS WHICH, IN EACH CASE, WERE AT A PRICE INSIDE THE MINIMUM PRICE MOVEMENT OF THE STERLING FUTURES CONTRACT, AND WHICH NECESSITATED THE EXECUTION OF TWO TRADES IN THE SAME STRATEGY AT DIFFERENT PRICE LEVELS TO ACHIEVE THE AVERAGE PRICE, IN ALLEGED VIOLATION OF LIFFE RULE 2.2.3.

Initiated By:	NYSE EURONEXT LIFFE ADMINISTRATION AND MANAGEMENT
Date Initiated:	11/13/2008
Docket/Case Number:	20080219GSF
Principal Product Type:	Futures - Financial
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	03/20/2009
Sanctions Ordered:	Monetary/Fine \$17,059.19
Other Sanctions Ordered:	
Sanction Details:	GSI AGREED TO THE PAYMENT OF A MONETARY PENALTY TO LIFFE OF £11,666 IN THE AGGREGATE, REPRESENTING A FINE OF £5,666, AND A CONTRIBUTION OF £6,000 TOWARDS THE COSTS INCURRED AS A RESULT OF THE DISCIPLINARY PROCEEDING, WHICH AMOUNT WAS PAID BY SUBMISSION OF A WIRE ON APRIL 9, 2009. WHILE THE ACTUAL PAYMENT WAS MADE IN BRITISH POUNDS, USING THE FEDERAL RESERVE FOREIGN EXCHANGE RATE OF £1:US\$1.4623 AS OF APRIL 9, 2009, THE EQUIVALENT US DOLLAR VALUE ON APRIL 9, 2009 WAS US\$17,059.19, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.
Firm Statement	FURTHER TO THE SETTLEMENT PROCEEDINGS, AND FOLLOWING THE REDUCTION OF THE FINE BY ONE THIRD, IT WAS AGREED THAT GSI BE FINED £5,666, AND MAKE A CONTRIBUTION OF £6,000 TOWARDS THE COSTS INCURRED AS A RESULT OF THE DISCIPLINARY PROCEEDING, IN RELATION TO CONTRAVENTION OF GENERAL NOTICE NO. 2515, IN RESPECT OF FACILITATING CONTINGENT ORDERS WHICH HAD THE EFFECT OF ACHIEVING A TRANSACTION AT AN AVERAGE PRICE INSIDE THE MINIMUM PRICE MOVEMENT OF THE CONTRACT CONCERNED. MSL (I)



ACKNOWLEDGED THAT GSI HAD APOLOGIZED FOR THE INCIDENT AND HAD CO-OPERATED FULLY WITH MSL DURING THE COURSE OF ITS PRELIMINARY INVESTIGATION, (II) ACCEPTED THAT NEITHER THE SALES PERSON NOR THE RESPONSIBLE PERSON INVOLVED HAD BENEFITTED FROM THE EXECUTION OF THE BLOCK TRADES, AND THAT (III) GSI HAD TAKEN STEPS, SINCE THE INCIDENTS, TO ENSURE THAT ALL RELEVANT STAFF WERE FULLY AWARE OF THE PROVISIONS OF GENERAL NOTICE 2515.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS BANK USA
Current Status:	Final
Allegations:	THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM (THE "FEDERAL RESERVE") ALLEGED THAT, PRIOR TO SEPTEMBER 1, 2011, THE GOLDMAN SACHS GROUP, INC. ("GS GROUP") AND GOLDMAN SACHS BANK USA ("GS BANK") ENGAGED IN A PATTERN OF MISCONDUCT AND NEGLIGENCE RELATING TO DEFICIENT PRACTICES IN RESIDENTIAL MORTGAGE LOAN SERVICING AND FORECLOSURE PROCESSING INVOLVING LITTON LOAN SERVICING LP ("LITTON"), A FORMER SUBSIDIARY.
Initiated By:	BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM
Date Initiated:	09/01/2011
Docket/Case Number:	11-112-B-HC/SM
Principal Product Type:	Other
Other Product Type(s):	RESIDENTIAL MORTGAGE LOANS
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	DISGORGEMENT; RESTITUTION
Resolution:	Consent
Resolution Date:	02/28/2013
Sanctions Ordered:	Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	AS APPLICABLE, SUBMIT POLICIES AND PROCEDURES ACCEPTABLE TO THE FEDERAL RESERVE AND SUBMIT CERTAIN REPORTS TO THE FEDERAL



RESERVE WITHIN THE APPLICABLE TIME PERIODS SET FORTH IN THE AMENDED CONSENT.

Sanction Details:

WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, GS GROUP, GS BANK AND THE FEDERAL RESERVE ENTERED INTO THE AMENDED CONSENT, WHICH PROVIDES FOR GS GROUP AND GS BANK TO: (I) MAKE A CASH PAYMENT THAT COLLECTIVELY TOTALS \$135 MILLION INTO A QUALIFIED SETTLEMENT FUND (THE "FUND") FROM WHICH PAYMENTS WILL BE MADE PURSUANT TO A DISTRIBUTION PLAN DEVELOPED BY THE FEDERAL RESERVE AND THE OFFICE OF THE COMPTROLLER OF THE CURRENCY (COLLECTIVELY, THE "REGULATORS") FOR DISTRIBUTION BY THE REGULATORS IN THEIR DISCRETION TO CERTAIN ELIGIBLE BORROWERS WHOSE RESIDENTIAL MORTGAGE LOAN ON THEIR PRIMARY RESIDENCE WAS SERVICED BY GS BANK, THROUGH LITTON, AND WHO WERE SUBJECT TO A FORECLOSURE ACTION OR PROCEEDING THAT WAS PENDING OR COMPLETED ANY TIME FROM JANUARY 1, 2009 TO DECEMBER 31, 2010; AND (II) COLLECTIVELY PROVIDE CERTAIN LOSS MITIGATION OR OTHER FORECLOSURE PREVENTION THAT COLLECTIVELY TOTALS \$195 MILLION, WITH PREFERENCE GIVEN TO ACTIVITIES DESIGNED TO KEEP BORROWERS IN THEIR HOMES THROUGH AFFORDABLE, SUSTAINABLE AND MEANINGFUL HOME PRESERVATION ACTIONS. ON MARCH 11, 2013, GS GROUP AND GS BANK MADE A CASH PAYMENT INTO THE FUND, AS PROVIDED IN THE AMENDED CONSENT, BY SUBMISSION OF A WIRE IN THE AMOUNT OF \$135 MILLION.

Firm Statement

WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, GS GROUP, GS BANK AND THE FEDERAL RESERVE ENTERED INTO THE AMENDED CONSENT, WHICH PROVIDES FOR THE TERMINATION OF THE INDEPENDENT FORECLOSURE REVIEW UNDER THE CONSENT AND CALLS FOR GS GROUP AND GS BANK, IN COORDINATION WITH THE 12 OTHER FINANCIAL INSTITUTIONS WITH MORTGAGE LOAN SERVICING OPERATIONS THAT HAVE ALSO AGREED TO AMEND THEIR RESPECTIVE ORDERS, TO ENSURE THAT THE FUND IS ESTABLISHED, FROM WHICH PAYMENTS WILL BE MADE PURSUANT TO A DISTRIBUTION PLAN DEVELOPED BY THE REGULATORS. THE AMENDED CONSENT PROVIDES FOR GS GROUP AND GS BANK TO: (I) MAKE A CASH PAYMENT THAT COLLECTIVELY TOTALS \$135 MILLION INTO THE FUND FOR DISTRIBUTION BY THE REGULATORS IN THEIR DISCRETION TO CERTAIN ELIGIBLE BORROWERS WHOSE RESIDENTIAL MORTGAGE LOAN ON THEIR PRIMARY RESIDENCE WAS SERVICED BY GS BANK, THROUGH LITTON, AND WHO WERE SUBJECT TO A FORECLOSURE ACTION OR PROCEEDING THAT WAS PENDING OR COMPLETED ANY TIME FROM JANUARY 1, 2009 TO DECEMBER 31, 2010; (II) COLLECTIVELY PROVIDE CERTAIN LOSS MITIGATION OR OTHER FORECLOSURE PREVENTION THAT COLLECTIVELY TOTALS \$195 MILLION, WITH PREFERENCE GIVEN TO ACTIVITIES DESIGNED TO KEEP BORROWERS IN THEIR HOMES THROUGH



AFFORDABLE, SUSTAINABLE AND MEANINGFUL HOME PRESERVATION ACTIONS; AND (III) AS APPLICABLE, SUBMIT POLICIES AND PROCEDURES ACCEPTABLE TO THE FEDERAL RESERVE AND SUBMIT CERTAIN REPORTS TO THE FEDERAL RESERVE WITHIN THE APPLICABLE TIME PERIODS SET FORTH IN THE AMENDED CONSENT. ON MARCH 11, 2013, GS GROUP AND GS BANK MADE A CASH PAYMENT INTO THE FUND, AS PROVIDED IN THE AMENDED CONSENT, BY SUBMISSION OF A WIRE IN THE AMOUNT OF \$135 MILLION.

Reporting Source:	Firm
Affiliate:	THE GOLDMAN SACHS GROUP, INC.
Current Status:	Final
Allegations:	THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM (THE "FEDERAL RESERVE") ALLEGED THAT, PRIOR TO SEPTEMBER 1, 2011, THE GOLDMAN SACHS GROUP, INC. ("GS GROUP") AND GOLDMAN SACHS BANK USA ("GS BANK") ENGAGED IN A PATTERN OF MISCONDUCT AND NEGLIGENCE RELATING TO DEFICIENT PRACTICES IN RESIDENTIAL MORTGAGE LOAN SERVICING AND FORECLOSURE PROCESSING INVOLVING LITTON LOAN SERVICING LP ("LITTON"), A FORMER SUBSIDIARY.
Initiated By:	BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM
Date Initiated:	09/01/2011
Docket/Case Number:	11-112-B-HC/SM
Principal Product Type:	Other
Other Product Type(s):	RESIDENTIAL MORTGAGE LOANS
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	DISGORGEMENT; RESTITUTION
Resolution:	Consent
Resolution Date:	02/28/2013
Sanctions Ordered:	Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	AS APPLICABLE, SUBMIT POLICIES AND PROCEDURES ACCEPTABLE TO THE FEDERAL RESERVE AND SUBMIT CERTAIN REPORTS TO THE FEDERAL RESERVE WITHIN THE APPLICABLE TIME PERIODS SET FORTH IN THE

**AMENDED CONSENT.****Sanction Details:**

WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, GS GROUP, GS BANK AND THE FEDERAL RESERVE ENTERED INTO THE AMENDED CONSENT, WHICH PROVIDES FOR GS GROUP AND GS BANK TO: (I) MAKE A CASH PAYMENT THAT COLLECTIVELY TOTALS \$135 MILLION INTO A QUALIFIED SETTLEMENT FUND (THE "FUND") FROM WHICH PAYMENTS WILL BE MADE PURSUANT TO A DISTRIBUTION PLAN DEVELOPED BY THE FEDERAL RESERVE AND THE OFFICE OF THE COMPTROLLER OF THE CURRENCY (COLLECTIVELY, THE "REGULATORS") FOR DISTRIBUTION BY THE REGULATORS IN THEIR DISCRETION TO CERTAIN ELIGIBLE BORROWERS WHOSE RESIDENTIAL MORTGAGE LOAN ON THEIR PRIMARY RESIDENCE WAS SERVICED BY GS BANK, THROUGH LITTON, AND WHO WERE SUBJECT TO A FORECLOSURE ACTION OR PROCEEDING THAT WAS PENDING OR COMPLETED ANY TIME FROM JANUARY 1, 2009 TO DECEMBER 31, 2010; AND (II) COLLECTIVELY PROVIDE CERTAIN LOSS MITIGATION OR OTHER FORECLOSURE PREVENTION THAT COLLECTIVELY TOTALS \$195 MILLION, WITH PREFERENCE GIVEN TO ACTIVITIES DESIGNED TO KEEP BORROWERS IN THEIR HOMES THROUGH AFFORDABLE, SUSTAINABLE AND MEANINGFUL HOME PRESERVATION ACTIONS. ON MARCH 11, 2013, GS GROUP AND GS BANK MADE A CASH PAYMENT INTO THE FUND, AS PROVIDED IN THE AMENDED CONSENT, BY SUBMISSION OF A WIRE IN THE AMOUNT OF \$135 MILLION.

Firm Statement

WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, GS GROUP, GS BANK AND THE FEDERAL RESERVE ENTERED INTO THE AMENDED CONSENT, WHICH PROVIDES FOR THE TERMINATION OF THE INDEPENDENT FORECLOSURE REVIEW UNDER THE CONSENT AND CALLS FOR GS GROUP AND GS BANK, IN COORDINATION WITH THE 12 OTHER FINANCIAL INSTITUTIONS WITH MORTGAGE LOAN SERVICING OPERATIONS THAT HAVE ALSO AGREED TO AMEND THEIR RESPECTIVE ORDERS, TO ENSURE THAT THE FUND IS ESTABLISHED, FROM WHICH PAYMENTS WILL BE MADE PURSUANT TO A DISTRIBUTION PLAN DEVELOPED BY THE REGULATORS. THE AMENDED CONSENT PROVIDES FOR GS GROUP AND GS BANK TO: (I) MAKE A CASH PAYMENT THAT COLLECTIVELY TOTALS \$135 MILLION INTO THE FUND FOR DISTRIBUTION BY THE REGULATORS IN THEIR DISCRETION TO CERTAIN ELIGIBLE BORROWERS WHOSE RESIDENTIAL MORTGAGE LOAN ON THEIR PRIMARY RESIDENCE WAS SERVICED BY GS BANK, THROUGH LITTON, AND WHO WERE SUBJECT TO A FORECLOSURE ACTION OR PROCEEDING THAT WAS PENDING OR COMPLETED ANY TIME FROM JANUARY 1, 2009 TO DECEMBER 31, 2010; (II) COLLECTIVELY PROVIDE CERTAIN LOSS MITIGATION OR OTHER FORECLOSURE PREVENTION THAT COLLECTIVELY TOTALS \$195 MILLION, WITH PREFERENCE GIVEN TO ACTIVITIES DESIGNED TO KEEP BORROWERS IN THEIR HOMES THROUGH AFFORDABLE, SUSTAINABLE AND MEANINGFUL HOME PRESERVATION



ACTIONS; AND (III) AS APPLICABLE, SUBMIT POLICIES AND PROCEDURES ACCEPTABLE TO THE FEDERAL RESERVE AND SUBMIT CERTAIN REPORTS TO THE FEDERAL RESERVE WITHIN THE APPLICABLE TIME PERIODS SET FORTH IN THE AMENDED CONSENT. ON MARCH 11, 2013, GS GROUP AND GS BANK MADE A CASH PAYMENT INTO THE FUND, AS PROVIDED IN THE AMENDED CONSENT, BY SUBMISSION OF A WIRE IN THE AMOUNT OF \$135 MILLION.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS AUSTRALIA PTY LTD (F/K/A GOLDMAN SACHS & PARTNERS AUSTRALIA PTY LTD)
Current Status:	Final
Allegations:	IN A CONTRAVENTION NOTICE DATED AUGUST 12, 2011 (THE "NOTICE"), THE AUSTRALIAN SECURITIES EXCHANGE ("ASX") ALLEGED THAT, DURING THE PERIOD FROM NOVEMBER 4, 2009 TO AUGUST 6, 2010 (THE "RELEVANT CONTRAVENTION PERIOD"), (I) GOLDMAN SACHS AUSTRALIA PTY LTD ("GS AUSTRALIA", FORMERLY KNOWN AS GOLDMAN SACHS & PARTNERS AUSTRALIA PTY LTD) CONTRAVENED ASX MARKET RULE 7.11.1 BY FAILING TO COMPLY WITH THE RELEVANT PROVISIONS OF THE AUSTRALIAN CORPORATIONS ACT (AND ITS ACCOMPANYING REGULATIONS) GOVERNING THE KEEPING AND TREATMENT OF MONEY PAID, OR PROPERTY GIVEN, TO GS AUSTRALIA IN CONNECTION WITH SERVICES PROVIDED TO, OR PRODUCTS HELD BY, CLIENTS OF GS AUSTRALIA, AND (II) GS AUSTRALIA CONTRAVENED ASX MARKET RULE 7.11.10 BY FAILING TO PERFORM A RECONCILIATION IN RELATION TO THE RELEVANT TRUST ACCOUNT IN THE TIME, FORM AND MANNER REQUIRED BY THE ASX.
Initiated By:	AUSTRALIAN SECURITIES EXCHANGE
Date Initiated:	08/12/2011
Docket/Case Number:	E2010029
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	UNSPECIFIED



Resolution:	Decision
Resolution Date:	12/14/2011
Sanctions Ordered:	Monetary/Fine \$49,520.00
Other Sanctions Ordered:	
Sanction Details:	<p>ON DECEMBER 14, 2011, THE ASX DISCIPLINARY TRIBUNAL (THE "TRIBUNAL") IMPOSED OF A FINE OF AU\$50,000, PLUS TAX, WHICH AMOUNT WILL BE PAID UPON RECEIPT OF AN INVOICE FROM ASX. WHILE THE ACTUAL PAYMENT WILL BE MADE IN AUSTRALIAN DOLLARS, USING THE FEDERAL RESERVE FOREIGN EXCHANGE RATE OF AU\$1:US\$0.9904 AS OF DECEMBER 14, 2011, THE EQUIVALENT US DOLLAR VALUE ON DECEMBER 14, 2011 WAS US\$49,520.00, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.</p>
Firm Statement	<p>THE ALLEGED CONTRAVENTIONS WERE REFERRED TO THE TRIBUNAL FOR DETERMINATION. ON DECEMBER 14, 2011, THE TRIBUNAL DETERMINED THAT GS AUSTRALIA CONTRAVENED ASX MARKET RULES 7.11.1 AND 7.11.10 DURING THE RELEVANT CONTRAVENTION PERIOD IN THE MANNER ALLEGED IN THE NOTICE, AND IMPOSED OF A FINE OF AU\$50,000, PLUS TAX. IN DETERMINING THE PENALTY, THE TRIBUNAL TOOK INTO ACCOUNT THAT: (I) GS AUSTRALIA HAS PREVIOUS DISCIPLINARY HISTORY, NOT WITHSTANDING THAT GS AUSTRALIA HAS NO DISCIPLINARY HISTORY REGARDING THE MATTERS RELEVANT TO THE MISCONDUCT; (II) THE RELEVANT CONDUCT HAD THE POTENTIAL TO DAMAGE THE REPUTATION AND INTEGRITY OF THE ASX AND THE MARKET AND FACILITIES IT OPERATES; (III) THE MISCONDUCT WAS SELF-REPORTED IN A TIMELY AND COMPREHENSIVE MANNER; (IV) GS AUSTRALIA FULLY CO-OPERATED WITH ASX IN RELATION TO THE CONDUCT OF ITS INVESTIGATION INTO THE CONTRAVENTIONS; (V) GS AUSTRALIA AGREED AT THE EARLIEST OPPORTUNITY NOT TO CONTEST THE CONTRAVENTIONS; (VI) THE MISCONDUCT WAS UNINTENTIONAL AND IN A NUMBER OF CASES THE CONDUCT WAS THE RESPONSIBILITY OF AN UNRELATED THIRD PARTY; (VII) AT NO STAGE WAS ANY MARKET TRANSACTION NOT ENABLED BECAUSE OF THE MISCONDUCT; (VIII) THERE WAS NO COMMERCIAL ADVANTAGE OR FINANCIAL BENEFIT OBTAINED BECAUSE OF THE MISCONDUCT; (IX) THERE WERE NO LOSSES SUFFERED BY CLIENTS, OR COMPENSATION CLAIMS OR COMPLAINTS MADE BY CLIENTS IN RELATION TO THE CONTRAVENTIONS AND (X) GS AUSTRALIA PROMPTLY IMPLEMENTED REMEDIAL MEASURES TO SEEK TO PREVENT ANY RECURRENCE OF THE CONTRAVENING CONDUCT.</p>

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Reporting Source: Firm



Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	IN AN ORIGINATING NOTICE TO GOLDMAN SACHS INTERNATIONAL ("GSI") DATED JUNE 28, 2011, AND RECEIVED BY GSI ON JULY 1, 2011, THE BOURSE DE MONTRÉAL INC. (THE "BOURSE") ALLEGED THAT, DURING THE PERIOD FROM MAY 27, 2008 TO NOVEMBER 2, 2010, GSI PROVIDED CERTAIN PERSONNEL ACCESS TO THE ELECTRONIC TRADING SYSTEM OF THE BOURSE WITHOUT HAVING OBTAINED THE PRIOR APPROVAL OF THE BOURSE, IN ALLEGED CONTRAVENTION OF SECTION A) OF ARTICLE 6366 OF THE RULES OF THE BOURSE.
Initiated By:	BOURSE DE MONTRÉAL INC.
Date Initiated:	06/28/2011
Docket/Case Number:	
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	08/30/2011
Sanctions Ordered:	Monetary/Fine \$50,837.61
Other Sanctions Ordered:	
Sanction Details:	GSI AGREED TO PAY A FINE IN THE AMOUNT OF CAD\$50,000, AS WELL AS AN ADDITIONAL AMOUNT OF CAD\$2,500 FOR COSTS, WHICH AMOUNT WAS PAID BY SUBMISSION OF A WIRE ON SEPTEMBER 22, 2011. WHILE THE ACTUAL PAYMENT WAS MADE IN CANADIAN DOLLARS, USING THE FEDERAL RESERVE FOREIGN EXCHANGE RATE OF CAD\$1.0327:USD\$1 AS OF SEPTEMBER 22, 2011, THE EQUIVALENT US DOLLAR VALUE ON SEPTEMBER 22, 2011 WAS USD\$50,837.61, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.
Firm Statement	BY WAY OF AN OFFER OF SETTLEMENT APPROVED ON AUGUST 30, 2011 BY THE SPECIAL COMMITTEE - REGULATORY DIVISION OF THE BOURSE, GSI AGREED TO PAY A FINE IN THE AMOUNT OF CAD\$50,000, AS WELL AS AN ADDITIONAL AMOUNT OF CAD\$2,500 FOR COSTS, WHICH AMOUNT WAS PAID BY SUBMISSION OF A WIRE ON SEPTEMBER 22, 2011. AS INDICATED IN A CIRCULAR PUBLISHED BY THE BOURSE ON SEPTEMBER 7, 2011: (I)



GSI DID NOT HAVE ANY PRIOR DISCIPLINARY RECORD WITH THE BOURSE, AND PROVIDED THE BOURSE WITH FULL COOPERATION THROUGHOUT ITS INQUIRIES AND (II) GSI'S ACTIONS DID NOT RESULT IN ANY HARM OR FINANCIAL LOSS TO CUSTOMERS OR TO OTHER APPROVED PARTICIPANTS, NOR DID IT GIVE RISE TO A FINANCIAL GAIN TO GSI OR ITS EMPLOYEES.

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Reporting Source:	Firm
Affiliate:	GS EQUITY MARKETS, L.P.
Current Status:	Final
Allegations:	THE FEDERAL FINANCIAL SUPERVISORY AUTHORITY OF GERMANY (BUNDESANSTALT FÜR FINANZDIENSTLEISTUNGSAUFSICHT - "BAFIN") ALLEGED A NEGLIGENT BREACH OF SUPERVISORY DUTIES IN CONTRAVENTION OF CERTAIN SHAREHOLDER DISCLOSURE REQUIREMENTS OF SECTION 21 (1) OF THE SECURITIES TRADING ACT (WERTPAPIERHANDELSGESETZES - WPHG) AGAINST GS EQUITY MARKETS, L.P. ("GSEM").
Initiated By:	FEDERAL FINANCIAL SUPERVISORY AUTHORITY OF GERMANY
Date Initiated:	06/29/2011
Docket/Case Number:	GZ: WA 17-WP 3120-2009/0236 2011/0363267
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	07/18/2011
Sanctions Ordered:	Monetary/Fine \$13,274.60
Other Sanctions Ordered:	
Sanction Details:	BAFIN IMPOSED A MONETARY PENALTY ON GSEM OF 9,453.50 EUROS IN THE AGGREGATE, REPRESENTING AN ADMINISTRATIVE FINE OF 9,000 EUROS AND PROCEDURAL EXPENSES OF 453.50 EUROS, WHICH AMOUNT WAS PAID ON JULY 18, 2011. WHILE THE ACTUAL PAYMENT WAS MADE IN



EUROS, USING THE FEDERAL RESERVE FOREIGN EXCHANGE RATE OF 1EURO:US\$1.4042 AS OF JULY 18, 2011, THE EQUIVALENT US DOLLAR VALUE ON JULY 18, 2011 WAS US\$13,274.60, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.

Firm Statement

BAFIN IMPOSED A MONETARY PENALTY ON GSEM OF 9,453.50 EUROS IN THE AGGREGATE, REPRESENTING AN ADMINISTRATIVE FINE OF 9,000 EUROS AND PROCEDURAL EXPENSES OF 453.50 EUROS, WHICH AMOUNT WAS PAID ON JULY 18, 2011.

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Reporting Source: Firm

Affiliate: GOLDMAN SACHS INTERNATIONAL

Current Status: Final

Allegations: ON JANUARY 28, 2011, MONITORING BY ICE FUTURES EUROPE (THE "EXCHANGE") DETECTED SIX NOTABLE "PRICE SPIKES" IN THE APRIL11 BRENT/WTI SPREAD THAT WERE INVESTIGATED BY THE EXCHANGE AND FOUND TO BE THE RESULT OF A LIMIT ORDER AND SEVERAL LARGE MARKET ORDERS PLACED IN QUICK SUCCESSION BY A GOLDMAN SACHS TRADER AT THE REQUEST OF HIS CLIENT, IN ALLEGED BREACH OF EXCHANGE RULE G.20.

Initiated By: ICE FUTURES EUROPE

Date Initiated: 06/02/2011

Docket/Case Number: 011191

Principal Product Type: Futures - Commodity

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 06/09/2011

Sanctions Ordered: Monetary/Fine \$40,465.00

Other Sanctions Ordered:

Sanction Details: GOLDMAN SACHS INTERNATIONAL ("GSI") AGREED TO THE IMPOSITION OF A FINE BY THE EXCHANGE OF GB£25,000, WHICH AMOUNT WAS PAID ON



JUNE 17, 2011. WHILE THE ACTUAL PAYMENT WAS MADE IN GB POUNDS, USING THE FEDERAL RESERVE FOREIGN EXCHANGE RATE OF GB£1:US\$1.6186 AS OF JUNE 17, 2011, THE EQUIVALENT US DOLLAR VALUE ON JUNE 17, 2011 WAS US\$40,465, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.

Firm Statement

AS INDICATED IN A CIRCULAR PUBLISHED BY THE EXCHANGE ON JUNE 17, 2011 (THE "CIRCULAR"), ON JUNE 2, 2011 THE EXCHANGE'S AUTHORISATION, RULES AND CONDUCT COMMITTEE (THE "COMMITTEE") SUMMARILY CONCLUDED: (I) THE BEHAVIOR OF GSI AND ITS CLIENT TO BE A CLEAR CASE OF DISORDERLY TRADING, IN THAT THE DISTORTING PRICE IMPACT OF THE PLACEMENT OF SUCH LARGE ORDERS IN CLOSE PROXIMITY WAS NOT CONSIDERED, AND (II) BOTH GSI AND ITS CLIENT TO BE AT FAULT IN THE MATTER, EMPHASIZING THAT ALL EXCHANGE MEMBERS HAVE A RESPONSIBILITY TO TRADE IN AN ORDERLY FASHION AT ALL TIMES, WHETHER ON THEIR OWN BEHALF OR ON BEHALF OF A CLIENT. GSI DID NOT SEEK TO APPEAL THE COMMITTEE'S FINDINGS AND PAID THE FINE ON JUNE 17, 2011. THE CIRCULAR ALSO SPECIFICALLY STATES THAT WHILE THE COMMITTEE CONSIDERED THE BREACH TO BE OF A SERIOUS NATURE, THE COMMITTEE FOUND NO EVIDENCE OF INTENTIONAL MANIPULATION OF THE MARKET. GSI PROVIDED THE EXCHANGE WITH FULL COOPERATION THROUGHOUT ITS INQUIRIES.

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Reporting Source:

Firm

Affiliate:

GOLDMAN SACHS BANK (EUROPE) P.L.C.

Current Status:

Final

Allegations:

ON APRIL 11, 2011, THE CENTRAL BANK OF IRELAND (THE "CENTRAL BANK") PROVIDED GOLDMAN SACHS BANK (EUROPE) P.L.C. ("GSBE") A NOTICE OF COMMENCEMENT OF EXAMINATION (THE "NOTICE"), PURSUANT TO PART IIIC OF THE IRISH CENTRAL BANK ACT OF 1942 (THE "ACT"), IN CONNECTION WITH CENTRAL BANK CONCERNS THAT GSBE MAY HAVE COMMITTED CERTAIN PRESCRIBED CONTRAVENTIONS FOR THE PURPOSE OF SECTION 33AO(1) OF THE ACT. THE PRESCRIBED CONTRAVENTIONS CITED BY THE CENTRAL BANK ARE THAT FROM IN OR AROUND DECEMBER 2008 TO OCTOBER 2010, GSBE FAILED: (I) TO HAVE OR TO IMPLEMENT, ANY, OR ANY EFFECTIVE, PROCESSES TO IDENTIFY, MANAGE, MONITOR OR REPORT THE COUNTERPARTY RISKS IT WAS OR MIGHT HAVE BEEN EXPOSED TO, IN ALLEGED CONTRAVENTION OF REGULATION 16(3)(B) OF THE EUROPEAN COMMUNITIES (LICENSING AND SUPERVISION OF CREDIT INSTITUTIONS) REGULATIONS 1992 (THE "REGULATIONS"), AND (II) TO HAVE OR MAINTAIN ANY OR ADEQUATE INTERNAL CONTROL MECHANISM TO IDENTIFY THAT THE CAPITAL



ADEQUACY TRACKING SYSTEM-COUNTERPARTY RISK REQUIREMENT APPLICATION WAS INCORRECTLY CALCULATING THE REGULATORY CAPITAL REQUIREMENTS, IN ALLEGED CONTRAVENTION OF REGULATION 16(3)(C) OF THE REGULATIONS.

Initiated By: CENTRAL BANK OF IRELAND

Date Initiated: 04/11/2011

Docket/Case Number: ASP/GSBE/BSO

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Reprimand

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 09/08/2011

Sanctions Ordered: Monetary/Fine \$219,360.00

Other Sanctions Ordered:

Sanction Details: GSBE AGREED TO THE PAYMENT OF A MONETARY PENALTY TO THE CENTRAL BANK IN THE AMOUNT OF 160,000.00 EUROS, WHICH AMOUNT WAS PAID BY SUBMISSION OF A WIRE ON SEPTEMBER 14, 2011. WHILE THE ACTUAL PAYMENT WAS MADE IN EUROS, USING THE FEDERAL RESERVE FOREIGN EXCHANGE RATE OF 1EURO:US\$1.3710 AS OF SEPTEMBER 14, 2011, THE EQUIVALENT US DOLLAR VALUE ON SEPTEMBER 14, 2011 WAS US\$219,360.00, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.

Firm Statement ON SEPTEMBER 8, 2011, GSBE ENTERED INTO A SETTLEMENT AGREEMENT (THE "SETTLEMENT AGREEMENT") WITH THE CENTRAL BANK IN RELATION TO BREACHES OF THE REGULATIONS, RELATING TO GSBE'S FAILURE, DURING THE PERIOD FROM JULY 16, 2008 TO DECEMBER 17, 2010, TO COMPLY WITH: (I) REGULATION 16(3)(B) OF THE REGULATIONS, IN THAT GSBE'S PROCESSES FAILED TO MANAGE, MONITOR AND REPORT ACCURATELY ITS REGULATORY COUNTERPARTY RISK CAPITAL REQUIREMENT, AND (II) REGULATION 16(3)(C) OF THE REGULATIONS, IN THAT GSBE'S INTERNAL CONTROL MECHANISM FAILED TO IDENTIFY THAT ITS REGULATORY COUNTERPARTY RISK CAPITAL REQUIREMENT WAS INCORRECTLY CALCULATED. GSBE AGREED TO A REPRIMAND AND TO THE PAYMENT OF A MONETARY PENALTY TO THE CENTRAL BANK IN THE AMOUNT OF 160,000.00 EUROS, WHICH AMOUNT WAS PAID BY SUBMISSION OF A WIRE ON SEPTEMBER 14, 2011. THE SETTLEMENT



AGREEMENT SPECIFICALLY STATES THAT THE ERROR AT ISSUE DID NOT RESULT IN ANY BREACH OF THE CAPITAL ADEQUACY RATIOS AND NO COUNTERPARTIES WERE IMPACTED AND THAT, IN DECIDING THE APPROPRIATE PENALTY TO IMPOSE, THE CENTRAL BANK TOOK INTO ACCOUNT: (I) THE REGULATORY CAPITAL MAINTAINED BY GSBE BETWEEN JULY 16, 2008 TO DECEMBER 17, 2010 WAS AT ALL TIMES IN EXCESS OF ITS CAPITAL REQUIREMENTS, (II) GSBE SELF REPORTED THE ISSUE TO THE CENTRAL BANK AND HAS TAKEN APPROPRIATE REMEDIAL STEPS TO RECTIFY THE BREACHES AND (III) THE COOPERATION OF GSBE DURING THE INVESTIGATION AND IN SETTLING AT AN EARLY STAGE IN THE ADMINISTRATIVE SANCTIONS PROCEDURE. THE CENTRAL BANK CONFIRMS THAT THE MATTER IS CLOSED.

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Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Allegations:	THE FINANCIAL SERVICES AUTHORITY IN THE UK ("FSA") INVESTIGATED GOLDMAN SACHS INTERNATIONAL ("GSI") IN RELATION TO (I) THE MARKETING OF THE SYNTHETIC COLLATERALIZED DEBT OBLIGATION TRANSACTION NAMED ABACUS 2007-AC1 ("ABACUS") BY GSI, (II) THE FAILURE BY GSI TO NOTIFY THE FSA OF THE SECURITIES AND EXCHANGE COMMISSION'S ("SEC") INVESTIGATION INTO ABACUS AND (III) GSI'S SYSTEMS AND CONTROLS WITH RESPECT TO THE INTERNAL REPORTING AND ESCALATION OF REGULATORY MATTERS.
Initiated By:	FINANCIAL SERVICES AUTHORITY
Date Initiated:	09/03/2010
Docket/Case Number:	
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	09/03/2010



Sanctions Ordered: Monetary/Fine \$27,371,750.00

Other Sanctions Ordered:

Sanction Details: GSI AGREED TO THE IMPOSITION OF A FINE BY THE FSA OF GB£17.5 MILLION, WHICH AMOUNT WAS PAID ON SEPTEMBER 15, 2010, WHILE THE ACTUAL PAYMENT WAS MADE IN GB POUNDS, USING THE FEDERAL RESERVE FOREIGN EXCHANGE RATE OF GB£1:US\$1.5641 AS OF SEPTEMBER 15, 2010. THE EQUIVALENT US DOLLAR VALUE ON SEPTEMBER 15, 2010 WAS US\$27,371,750, WHICH AMOUNT IS REFLECTED IN ITEM 12.A. ABOVE.

Firm Statement GSI AGREED TO THE IMPOSITION OF A FINE OF GB£17.5 MILLION, WHICH AMOUNT WAS PAID ON SEPTEMBER 15, 2010. AS INDICATED IN A NOTICE PUBLISHED BY THE FSA ON SEPTEMBER 9, 2010 (THE "NOTICE"), IN RESPECT OF BREACHES OF FSA PRINCIPLES 2, 3, AND 11, THE FSA INCLUDED IN ITS "REASONS FOR ACTION" THAT, DURING THE RELEVANT PERIOD, WHICH OCCURRED BETWEEN JULY 2009 AT THE LATEST AND APRIL 16, 2010: (I) IN BREACH OF FSA PRINCIPLE 2, GSI FAILED TO CONDUCT ITS BUSINESS WITH DUE SKILL, CARE AND DILIGENCE IN RELATION TO ITS REGULATORY OBLIGATIONS, SPECIFICALLY, GSI FAILED TO CONSIDER THE REGULATORY REPORTING OBLIGATIONS FOR GSI OF THE SEC INVESTIGATION, INCLUDING THE GOLDMAN, SACHS & CO. WELLS NOTICES AND THE MR. FABRICE TOURRE WELLS NOTICE, (II) IN BREACH OF FSA PRINCIPLE 3, GSI FAILED TO TAKE REASONABLE CARE TO ORGANIZE AND CONTROL ITS AFFAIRS RESPONSIBLY AND EFFECTIVELY WITH ADEQUATE POLICIES, PROCEDURES, SYSTEMS AND CONTROLS IN RELATION TO INTERNAL COMMUNICATIONS WITHIN THE GS GROUP AND GSI TO ENABLE GSI TO FULFILL ITS EXTERNAL REGULATORY REPORTING OBLIGATIONS, AND (III) IN BREACH OF FSA PRINCIPLE 11, GSI FAILED TO DISCLOSE THE MR. TOURRE WELLS NOTICE TO THE FSA, WHICH WAS INFORMATION OF WHICH THE FSA WOULD REASONABLY EXPECT NOTICE AND WHICH WAS REASONABLY MATERIAL TO THE ASSESSMENT OF MR. TOURRE'S FITNESS AND PROPRIETY TO HOLD A CONTROLLED FUNCTION. THE FSA ACCEPTED THAT THIS FAILURE WAS NOT AS A RESULT OF GSI DELIBERATELY WITHHOLDING INFORMATION. NO FINDING WAS MADE WITH RESPECT TO THE MARKETING OF ABACUS BY GSI. AS ACKNOWLEDGED IN THE NOTICE, A PROGRAM OF ENHANCEMENTS TO GSI'S SYSTEMS IS UNDERWAY TO ENSURE THAT ALL RELEVANT ISSUES ARE REPORTED TO THE FSA, A NUMBER OF IMPROVEMENTS HAVE ALREADY BEEN MADE. THE NOTICE ALSO SPECIFICALLY STATES THAT THE BREACHES IT IDENTIFIED WERE NOT DELIBERATE, BUT INADVERTENT AND THAT THEY DO NOT REFLECT ADVERSELY ON THE INTEGRITY OF GSI OR THE INDIVIDUALS CONCERNED.



Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS JB WERE (NZ) LIMITED
Current Status:	Final
Allegations:	NZX LIMITED ("NZX")ALLEGED THAT GOLDMAN SACHS JBWERE (NZ) LIMITED ("JBWERE (NZ)") BREACHED NZX PARTICIPANT RULES 11.3.1 AND 8.1.1(C) BY FAILING TO BRING A CLIENT'S ORDER TO MARKET AND BY INACCURATELY ADVISING THE SAME CLIENT THAT ITS ORDER HAD BEEN PLACED.
Initiated By:	NZX LIMITED
Date Initiated:	03/25/2010
Docket/Case Number:	NZMDT 001/10
Principal Product Type:	Debt - Corporate
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	COSTS; AGREEMENT TO REVIEW RELATED CUSTOMER COMPLAINT
Resolution:	Settled
Resolution Date:	05/25/2010
Sanctions Ordered:	Monetary/Fine \$30,000.00
Other Sanctions Ordered:	COSTS; AGREEMENT TO REVIEW RELATED CUSTOMER COMPLAINT
Sanction Details:	JBWERE (NZ) PAID A MONETARY PENALTY IN THE AMOUNT OF NZ\$30,000 TO THE NZX ON JUNE 22, 2010.
Firm Statement	THE NZX AND JBWERE (NZ) AGREED TO SETTLEMENT TERMS THAT WERE APPROVED BY THE NZ MARKETS DISCIPLINARY TRIBUNAL ON MAY 25, 2010, AND ON JUNE 22, 2010, JBWERE (NZ) PAID A MONETARY PENALTY IN THE AMOUNT OF NZ\$30,000 TO THE NZX.

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Reporting Source:	Firm
Affiliate:	SLK HULL DERIVATIVES LLC (HISTORICAL CRD NUMBER 46735 - AN AFFILIATE OF THE APPLICANT THAT FILED FORM BDW ON MARCH 30, 2007
Current Status:	Final



Allegations:	NASDAQ OMX PHLX, INC. (THE "EXCHANGE") ALLEGED THAT DURING JANUARY 1, 2003 THROUGH AUGUST 3, 2004, AND DURING NOVEMBER 1, 2005 THROUGH MARCH 26, 2007, SLK-HULL DERIVATIVES LLC ("SHD") FAILED TO EXECUTE CERTAIN INCOMING ORDERS FOR VARIOUS OPTION SERIES AT THE DISSEMINATED PRICE IN AN AMOUNT UP TO THE DISSEMINATED SIZE, IN ALLEGED VIOLATION OF EXCHANGE RULE 1082.
Initiated By:	NASDAQ OMX PHLX, INC.
Date Initiated:	02/16/2010
Docket/Case Number:	ENFORCEMENT NO. 2009-29
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Stipulation and Consent
Resolution Date:	02/16/2010
Sanctions Ordered:	Censure Monetary/Fine \$40,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, SHD CONSENTED TO A FINE IN THE AMOUNT OF \$40,000. SHD WILL SUBMIT A CHECK OR WIRE IN PAYMENT OF THE FINE AMOUNT UPON RECEIPT OF THE INVOICE FROM THE EXCHANGE.
Firm Statement	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, SHD SUBMITTED AN OFFER OF SETTLEMENT, STIPULATION OF FACTS AND CONSENT TO SANCTIONS WHICH WAS ACCEPTED BY A DECISION OF THE BUSINESS CONDUCT COMMITTEE OF THE EXCHANGE ON FEBRUARY 16, 2010.



Criminal - Final Disposition

Disclosure 1 of 4

Reporting Source:	Firm
Affiliate:	THE GOLDMAN SACHS GROUP, INC.
Current Status:	Final
Status Date:	5/6/2024
Charge Details:	A CRIMINAL INFORMATION WAS FILED ON OCTOBER 22, 2020, IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK CHARGING THE GOLDMAN SACHS GROUP, INC. ("GS GROUP") WITH (1) ONE FELONY COUNT OF CONSPIRACY TO VIOLATE THE FOREIGN CORRUPT PRACTICES ACT OF 1977 (THE "FCPA"), TITLE 18, UNITED STATES CODE, SECTION 371 (THE "INFORMATION"), RELATED TO CORPORATE DEBT TRANSACTIONS. GS GROUP WAIVED INDICTMENT AND ANY OBJECTION TO VENUE, AND ACCEPTED AND ACKNOWLEDGED RESPONSIBILITY FOR THE ACTS OF ITS OFFICERS AND EMPLOYEES AS SET FORTH IN THE ACCOMPANYING STATEMENT OF FACTS. A PLEA WAS NOT ENTERED IN RESPECT OF ANY OF THE CHARGES. THE CRIMINAL INFORMATION WAS DISMISSED WITH PREJUDICE ON MAY 6, 2024.
Felony:	Yes
Court Details:	UNITED STATES DISTRICT COURT - EASTERN DISTRICT OF NEW YORK - CR. NO. 20-437 (MKB)
Charge Date:	10/22/2020
Disposition Details:	ON OCTOBER 22, 2020, GS GROUP ENTERED INTO A DEFERRED PROSECUTION AGREEMENT ("DPA") WITH THE DEPARTMENT OF JUSTICE AND THE UNITED STATES ATTORNEY'S OFFICE FOR THE EASTERN DISTRICT OF NEW YORK (COLLECTIVELY, THE "OFFICES"). PROSECUTION WAS DEFERRED FOR THREE YEARS FROM THE DATE OF THE DPA. THE CRIMINAL INFORMATION WAS DISMISSED WITH PREJUDICE ON MAY 6, 2024. AS PART OF THE DPA, GS GROUP AGREED TO PAY THE OFFICES A CRIMINAL MONETARY PENALTY OF \$1,263,088,000, OF WHICH \$500,000 WOULD BE PAID AS A CRIMINAL FINE BY GOLDMAN SACHS (MALAYSIA) SDN. BHD. ("GS MALAYSIA"), FOR TOTAL MONETARY PENALTIES OF \$2,315,088,000, WHICH INCLUDED PAYMENTS TO FOREIGN AND OTHER DOMESTIC REGULATORS. ALL PENALTIES OWED WERE PAID BY JUNE 21, 2021.
Firm Statement	AS DESCRIBED IN THE INFORMATION, FROM 2009 TO 2014, GS GROUP AND ITS AFFILIATES, THROUGH CERTAIN OF ITS EMPLOYEES AND AGENTS, KNOWINGLY AND WILLFULLY CONSPIRED AND AGREED WITH OTHERS TO CORRUPTLY PROVIDE PAYMENTS AND THINGS OF VALUE IN EXCHANGE



FOR OBTAINING AND RETAINING BUSINESS. PURSUANT TO THE DPA, GS GROUP HAS AGREED TO, AMONG OTHER THINGS (I) COOPERATE FULLY WITH THE OFFICES AND OTHER DOMESTIC OR FOREIGN LAW ENFORCEMENT AND REGULATORY AUTHORITIES AND AGENCIES, AS WELL AS THE MULTILATERAL DEVELOPMENT BANKS; (II) CONTINUE TO IMPLEMENT A COMPLIANCE AND ETHICS PROGRAM DESIGNED TO PREVENT AND DETECT VIOLATIONS OF THE FCPA AND OTHER APPLICABLE ANTI-CORRUPTION LAWS; (III) REVIEW AND, WHERE NECESSARY AND APPROPRIATE, MODIFY OR MAINTAIN ITS EXISTING INTERNAL ACCOUNTING CONTROLS, POLICIES, AND PROCEDURES REGARDING COMPLIANCE WITH THE FCPA AND OTHER APPLICABLE ANTI-CORRUPTION LAWS; (IV) REPORT ANNUALLY TO THE OFFICES DURING THE TERM OF THE DPA REGARDING REMEDIATION AND IMPLEMENTATION OF THE COMPLIANCE MEASURES DESCRIBED IN THE DPA; AND (V) PAY THE OFFICES A CRIMINAL MONETARY PENALTY OF \$1,263,088,000, OF WHICH \$500,000 WOULD BE PAID AS A CRIMINAL FINE BY GS MALAYSIA (IN ADDITION TO THE AMOUNTS PAID TO OTHER DOMESTIC AND FOREIGN REGULATORS FOR A TOTAL OF \$2,315,088,000). ON MAY 6, 2024, THE COURT GRANTED THE UNITED STATES' MOTION TO DISMISS THE CRIMINAL INFORMATION, WITH PREJUDICE.

Disclosure 2 of 4	
Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS (MALAYSIA) SDN. BHD.
Current Status:	Final
Status Date:	10/22/2020
Charge Details:	ON OCTOBER 22, 2020, GOLDMAN SACHS (MALAYSIA) SDN. BHD. ("GS MALAYSIA") PLED GUILTY TO ONE FELONY COUNT OF CONSPIRACY TO VIOLATE THE FOREIGN CORRUPT PRACTICES ACT OF 1977 (THE "FCPA"), TITLE 18, UNITED STATES CODE, SECTION 371, RELATED TO CORPORATE DEBT TRANSACTIONS.
Felony:	Yes
Court Details:	UNITED STATES DISTRICT COURT - EASTERN DISTRICT OF NEW YORK - CR. NO. 20-438 (MKB)
Charge Date:	10/22/2020
Disposition Details:	ON OCTOBER 22, 2020, GS MALAYSIA PLED GUILTY TO ONE COUNT OF CONSPIRACY TO COMMIT OFFENSES AGAINST THE UNITED STATES, IN VIOLATION OF THE FCPA, TITLE 18, UNITED STATES CODE, SECTION 371. PURSUANT TO THE PLEA AGREEMENT PRESENTED TO THE EASTERN



DISTRICT OF NEW YORK ON OCTOBER 22, 2020 (THE "PLEA AGREEMENT"), GS MALAYSIA HAS AGREED TO (I) COOPERATE FULLY WITH THE DEPARTMENT OF JUSTICE AND THE UNITED STATES ATTORNEY'S OFFICE FOR THE EASTERN DISTRICT OF NEW YORK (COLLECTIVELY, THE "OFFICES"), OTHER DOMESTIC OR FOREIGN LAW ENFORCEMENT AND REGULATORY AUTHORITIES AND AGENCIES; (II) PROMPTLY REPORT ANY NEWLY LEARNED EVIDENCE OR ALLEGATIONS OF CONDUCT THAT MIGHT CONSTITUTE A VIOLATION OF THE MONEY LAUNDERING LAWS THAT INVOLVE ITS EMPLOYEES OR AGENTS; (III) PAY A \$500,000 CRIMINAL FINE AS PART OF THE TOTAL CRIMINAL MONETARY PENALTY REQUIRED BY THE DEFERRED PROSECUTION AGREEMENT THE GOLDMAN SACHS GROUP, INC. ("GS GROUP") ENTERED INTO WITH THE OFFICES ON OCTOBER 22, 2020 ("DPA"); (IV) COMMIT NO FURTHER CRIMES; AND (V) TO WORK WITH GS GROUP IN FULFILLING ITS OBLIGATIONS UNDER THE DPA.

Firm Statement

AS DESCRIBED IN THE INFORMATION, FROM 2009 TO 2014, GS GROUP AND ITS AFFILIATES, THROUGH CERTAIN OF ITS EMPLOYEES AND AGENTS, INCLUDING GS MALAYSIA, KNOWINGLY AND WILLFULLY CONSPIRED AND AGREED WITH OTHERS TO CORRUPTLY PROVIDE PAYMENTS AND THINGS OF VALUE IN EXCHANGE FOR OBTAINING AND RETAINING BUSINESS. PURSUANT TO THE PLEA AGREEMENT, GS MALAYSIA HAS AGREED TO (I) COOPERATE FULLY WITH THE OFFICES, OTHER DOMESTIC OR FOREIGN LAW ENFORCEMENT AND REGULATORY AUTHORITIES AND AGENCIES; (II) PROMPTLY REPORT ANY NEWLY LEARNED EVIDENCE OR ALLEGATIONS OF CONDUCT THAT MIGHT CONSTITUTE A VIOLATION OF THE MONEY LAUNDERING LAWS THAT INVOLVE ITS EMPLOYEES OR AGENTS; (III) PAY A \$500,000 CRIMINAL FINE AS PART OF THE TOTAL CRIMINAL MONETARY PENALTY REQUIRED BY THE DPA; (IV) COMMIT NO FURTHER CRIMES; AND (V) TO WORK WITH GS GROUP IN FULFILLING ITS OBLIGATIONS UNDER THE DPA.

Disclosure 3 of 4

Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS INTERNATIONAL
Current Status:	Final
Status Date:	9/4/2020
Charge Details:	THE MALAYSIAN ATTORNEY GENERAL ("ATTORNEY GENERAL") HAS CHARGED GOLDMAN SACHS INTERNATIONAL ("GSI"), AS BOOKRUNNER AND ARRANGER OF THREE OFFERINGS OF DEBT SECURITIES OF 1MALAYSIA DEVELOPMENT BERHAD, CONDUCTED IN 2012 AND 2013, FOR ALLEGED DISCLOSURE DEFICIENCIES IN THE OFFERING DOCUMENTS, A FELONY. THE ATTORNEY GENERAL HAS CHARGED GOLDMAN SACHS



(ASIA) L.L.C. AND GOLDMAN SACHS (SINGAPORE) PTE. FOR HAVING ABETTED GSI IN ITS ALLEGED ACTIVITIES. THE ATTORNEY GENERAL HAS STATED THAT IT WILL SEEK CRIMINAL FINES IN EXCESS OF \$2.7 BILLION AND THE \$600 MILLION IN FEES GSI RECEIVED IN THE DEBT OFFERINGS. THE CRIMINAL OFFENSES ARE THE EQUIVALENT OF FELONY CHARGES.

Felony:	Yes
Court Details:	KUALA LUMPUR MAGISTRATES COURT
Charge Date:	12/17/2018
Disposition Details:	ON SEPTEMBER 4, 2020, GOLDMAN SACHS INTERNATIONAL, GOLDMAN SACHS (ASIA) LLP, AND GOLDMAN SACHS (SINGAPORE) PTE. WERE ACQUITTED AND THE CHARGES AGAINST THEM WERE DISCHARGED, AND THE PROCEEDINGS AGAINST THE CURRENT AND FORMER DIRECTORS WERE DISCONTINUED.
Firm Statement	ON DECEMBER 17, 2018, THE MALAYSIAN ATTORNEY GENERAL ("ATTORNEY GENERAL") CHARGED GOLDMAN SACHS INTERNATIONAL, AS THE BOOKRUNNER AND ARRANGER OF THREE OFFERINGS OF DEBT SECURITIES OF 1MALAYSIA DEVELOPMENT BERHAD, AGGREGATING APPROXIMATELY \$6.5 BILLION IN PRINCIPAL AMOUNT, FOR ALLEGED DISCLOSURE DEFICIENCIES IN THE OFFERING DOCUMENTS RELATING TO, AMONG OTHER THINGS, THE USE OF PROCEEDS FOR THE DEBT SECURITIES. GOLDMAN SACHS (ASIA) L.L.C., GOLDMAN SACHS (SINGAPORE) PTE., TIM LEISSNER, A FORMER PARTICIPATING MANAGING DIRECTOR OF GOLDMAN SACHS (ASIA) L.L.C. AND GOLDMAN SACHS (SINGAPORE) PTE., LOW TAEK JHO AND LOO AI SWAN WERE ALSO CHARGED, AND ON DECEMBER 19, 2018, ROGER NG CHONG HWA, A FORMER MANAGING DIRECTOR OF GOLDMAN SACHS (SINGAPORE) PTE., ALSO WAS ARRESTED AND CHARGED. ON JULY 24, 2020, THE GOLDMAN SACHS GROUP, INC. (TOGETHER WITH ITS CONSOLIDATED SUBSIDIARIES, THE "FIRM") REACHED AN AGREEMENT IN PRINCIPLE WITH THE GOVERNMENT OF MALAYSIA TO RESOLVE ALL CRIMINAL AND REGULATORY PROCEEDINGS IN MALAYSIA INVOLVING THE FIRM, INCLUDING PENDING CRIMINAL PROCEEDINGS AGAINST GOLDMAN SACHS SUBSIDIARIES AND CERTAIN CURRENT AND FORMER DIRECTORS, RELATING TO THIS MATTER. IN PRINCIPLE, THE AGREEMENT INVOLVED A SETTLEMENT PAYMENT TO THE GOVERNMENT OF MALAYSIA, AND A PORTION OF THE PROCEEDS FROM ASSETS SEIZED IN RELATION TO THIS MATTER. A SETTLEMENT AGREEMENT WAS ENTERED ON AUGUST 18, 2020, IMPLEMENTING THE PRIOR AGREEMENT IN PRINCIPLE. ON SEPTEMBER 4, 2020, GOLDMAN SACHS INTERNATIONAL, GOLDMAN SACHS (ASIA) LLP, AND GOLDMAN SACHS (SINGAPORE) PTE. WERE ACQUITTED AND THE CHARGES AGAINST THEM WERE DISCHARGED, AND THE PROCEEDINGS AGAINST THE CURRENT AND FORMER DIRECTORS WERE DISCONTINUED.



Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS (ASIA) L.L.C.
Current Status:	Final
Status Date:	9/4/2020
Charge Details:	THE MALAYSIAN ATTORNEY GENERAL ("ATTORNEY GENERAL") HAS CHARGED GOLDMAN SACHS INTERNATIONAL ("GSI"), AS BOOKRUNNER AND ARRANGER OF THREE OFFERINGS OF DEBT SECURITIES OF 1MALAYSIA DEVELOPMENT BERHAD, CONDUCTED IN 2012 AND 2013, FOR ALLEGED DISCLOSURE DEFICIENCIES IN THE OFFERING DOCUMENTS, A FELONY. THE ATTORNEY GENERAL HAS CHARGED GOLDMAN SACHS (ASIA) L.L.C. AND GOLDMAN SACHS (SINGAPORE) PTE. FOR HAVING ABETTED GSI IN ITS ALLEGED ACTIVITIES. THE ATTORNEY GENERAL HAS STATED THAT IT WILL SEEK CRIMINAL FINES IN EXCESS OF \$2.7 BILLION AND THE \$600 MILLION IN FEES GSI RECEIVED IN THE DEBT OFFERINGS. THE CRIMINAL OFFENSES ARE THE EQUIVALENT OF FELONY CHARGES.
Felony:	Yes
Court Details:	KUALA LUMPUR MAGISTRATES COURT
Charge Date:	12/17/2018
Disposition Details:	ON SEPTEMBER 4, 2020, GOLDMAN SACHS INTERNATIONAL, GOLDMAN SACHS (ASIA) LLP, AND GOLDMAN SACHS (SINGAPORE) PTE. WERE ACQUITTED AND THE CHARGES AGAINST THEM WERE DISCHARGED, AND THE PROCEEDINGS AGAINST THE CURRENT AND FORMER DIRECTORS WERE DISCONTINUED.
Firm Statement	ON DECEMBER 17, 2018, THE MALAYSIAN ATTORNEY GENERAL ("ATTORNEY GENERAL") CHARGED GOLDMAN SACHS INTERNATIONAL, AS THE BOOKRUNNER AND ARRANGER OF THREE OFFERINGS OF DEBT SECURITIES OF 1MALAYSIA DEVELOPMENT BERHAD, AGGREGATING APPROXIMATELY \$6.5 BILLION IN PRINCIPAL AMOUNT, FOR ALLEGED DISCLOSURE DEFICIENCIES IN THE OFFERING DOCUMENTS RELATING TO, AMONG OTHER THINGS, THE USE OF PROCEEDS FOR THE DEBT SECURITIES. GOLDMAN SACHS (ASIA) L.L.C., GOLDMAN SACHS (SINGAPORE) PTE., TIM LEISSNER, A FORMER PARTICIPATING MANAGING DIRECTOR OF GOLDMAN SACHS (ASIA) L.L.C. AND GOLDMAN SACHS (SINGAPORE) PTE., LOW TAEK JHO AND LOO AI SWAN WERE ALSO CHARGED, AND ON DECEMBER 19, 2018, ROGER NG CHONG HWA, A FORMER MANAGING DIRECTOR OF GOLDMAN SACHS (SINGAPORE) PTE., ALSO WAS ARRESTED AND CHARGED. ON JULY 24, 2020, THE GOLDMAN SACHS GROUP, INC. (TOGETHER WITH ITS CONSOLIDATED SUBSIDIARIES,



THE "FIRM") REACHED AN AGREEMENT IN PRINCIPLE WITH THE GOVERNMENT OF MALAYSIA TO RESOLVE ALL CRIMINAL AND REGULATORY PROCEEDINGS IN MALAYSIA INVOLVING THE FIRM, INCLUDING PENDING CRIMINAL PROCEEDINGS AGAINST GOLDMAN SACHS SUBSIDIARIES AND CERTAIN CURRENT AND FORMER DIRECTORS, RELATING TO THIS MATTER. IN PRINCIPLE, THE AGREEMENT INVOLVED A SETTLEMENT PAYMENT TO THE GOVERNMENT OF MALAYSIA, AND A PORTION OF THE PROCEEDS FROM ASSETS SEIZED IN RELATION TO THIS MATTER. A SETTLEMENT AGREEMENT WAS ENTERED ON AUGUST 18, 2020, IMPLEMENTING THE PRIOR AGREEMENT IN PRINCIPLE. ON SEPTEMBER 4, 2020, GOLDMAN SACHS INTERNATIONAL, GOLDMAN SACHS (ASIA) LLP, AND GOLDMAN SACHS (SINGAPORE) PTE. WERE ACQUITTED AND THE CHARGES AGAINST THEM WERE DISCHARGED, AND THE PROCEEDINGS AGAINST THE CURRENT AND FORMER DIRECTORS WERE DISCONTINUED.

Reporting Source:	Firm
Affiliate:	GOLDMAN SACHS (SINGAPORE) PTE.
Current Status:	Final
Status Date:	9/4/2020
Charge Details:	THE MALAYSIAN ATTORNEY GENERAL ("ATTORNEY GENERAL") HAS CHARGED GOLDMAN SACHS INTERNATIONAL ("GSI"), AS BOOKRUNNER AND ARRANGER OF THREE OFFERINGS OF DEBT SECURITIES OF 1MALAYSIA DEVELOPMENT BERHAD, CONDUCTED IN 2012 AND 2013, FOR ALLEGED DISCLOSURE DEFICIENCIES IN THE OFFERING DOCUMENTS, A FELONY. THE ATTORNEY GENERAL HAS CHARGED GOLDMAN SACHS (ASIA) L.L.C. AND GOLDMAN SACHS (SINGAPORE) PTE. FOR HAVING ABETTED GSI IN ITS ALLEGED ACTIVITIES. THE ATTORNEY GENERAL HAS STATED THAT IT WILL SEEK CRIMINAL FINES IN EXCESS OF \$2.7 BILLION AND THE \$600 MILLION IN FEES GSI RECEIVED IN THE DEBT OFFERINGS. THE CRIMINAL OFFENSES ARE THE EQUIVALENT OF FELONY CHARGES.
Felony:	Yes
Court Details:	KUALA LUMPUR MAGISTRATES COURT
Charge Date:	12/17/2018
Disposition Details:	ON SEPTEMBER 4, 2020, GOLDMAN SACHS INTERNATIONAL, GOLDMAN SACHS (ASIA) LLP, AND GOLDMAN SACHS (SINGAPORE) PTE. WERE ACQUITTED AND THE CHARGES AGAINST THEM WERE DISCHARGED, AND THE PROCEEDINGS AGAINST THE CURRENT AND FORMER DIRECTORS WERE DISCONTINUED.



Firm Statement

ON DECEMBER 17, 2018, THE MALAYSIAN ATTORNEY GENERAL ("ATTORNEY GENERAL") CHARGED GOLDMAN SACHS INTERNATIONAL, AS THE BOOKRUNNER AND ARRANGER OF THREE OFFERINGS OF DEBT SECURITIES OF 1MALAYSIA DEVELOPMENT BERHAD, AGGREGATING APPROXIMATELY \$6.5 BILLION IN PRINCIPAL AMOUNT, FOR ALLEGED DISCLOSURE DEFICIENCIES IN THE OFFERING DOCUMENTS RELATING TO, AMONG OTHER THINGS, THE USE OF PROCEEDS FOR THE DEBT SECURITIES. GOLDMAN SACHS (ASIA) L.L.C., GOLDMAN SACHS (SINGAPORE) PTE., TIM LEISSNER, A FORMER PARTICIPATING MANAGING DIRECTOR OF GOLDMAN SACHS (ASIA) L.L.C. AND GOLDMAN SACHS (SINGAPORE) PTE., LOW TAEK JHO AND LOO AI SWAN WERE ALSO CHARGED, AND ON DECEMBER 19, 2018, ROGER NG CHONG HWA, A FORMER MANAGING DIRECTOR OF GOLDMAN SACHS (SINGAPORE) PTE., ALSO WAS ARRESTED AND CHARGED. ON JULY 24, 2020, THE GOLDMAN SACHS GROUP, INC. (TOGETHER WITH ITS CONSOLIDATED SUBSIDIARIES, THE "FIRM") REACHED AN AGREEMENT IN PRINCIPLE WITH THE GOVERNMENT OF MALAYSIA TO RESOLVE ALL CRIMINAL AND REGULATORY PROCEEDINGS IN MALAYSIA INVOLVING THE FIRM, INCLUDING PENDING CRIMINAL PROCEEDINGS AGAINST GOLDMAN SACHS SUBSIDIARIES AND CERTAIN CURRENT AND FORMER DIRECTORS, RELATING TO THIS MATTER. IN PRINCIPLE, THE AGREEMENT INVOLVED A SETTLEMENT PAYMENT TO THE GOVERNMENT OF MALAYSIA, AND A PORTION OF THE PROCEEDS FROM ASSETS SEIZED IN RELATION TO THIS MATTER. A SETTLEMENT AGREEMENT WAS ENTERED ON AUGUST 18, 2020, IMPLEMENTING THE PRIOR AGREEMENT IN PRINCIPLE. ON SEPTEMBER 4, 2020, GOLDMAN SACHS INTERNATIONAL, GOLDMAN SACHS (ASIA) LLP, AND GOLDMAN SACHS (SINGAPORE) PTE. WERE ACQUITTED AND THE CHARGES AGAINST THEM WERE DISCHARGED, AND THE PROCEEDINGS AGAINST THE CURRENT AND FORMER DIRECTORS WERE DISCONTINUED.

Disclosure 4 of 4

Reporting Source:	Firm
Affiliate:	MTGLQ INVESTORS, L.P.
Current Status:	Final
Status Date:	8/26/2010
Charge Details:	ON AUGUST 6, 2010, MTGLQ ENTERED A PLEA OF "NO CONTEST" TO A MISDEMEANOR VIOLATION OF SECTION 367.12(C) OF THE CITY OF CLEVELAND, OHIO CODIFIED ORDINANCES IN FOUR CASES FILED IN CLEVELAND MUNICIPAL COURT. THE CLEVELAND ORDINANCE REQUIRES A SELLER OF REAL PROPERTY TO FURNISH TO THE PURCHASER A



CERTIFICATE OF DISCLOSURE ADDRESSING THE CONDITION OF THE PROPERTY BEFORE ENTERING INTO A CONTRACT FOR SALE; EACH VIOLATION OF THE ORDINANCE CARRIES A MAXIMUM FINE OF \$5,000. RATHER THAN IMPOSE THE MAXIMUM FINE, THE CLEVELAND MUNICIPAL COURT REDUCED THE TOTAL FINE TO A SUM OF \$2,500 PER VIOLATION, OR \$10,000 IN TOTAL.

Felony:

No

Court Details:

CLEVELAND MUNICIPAL COURT, CITY OF CLEVELAND, OHIO, SECTION 367.12(C) OF THE CITY OF CLEVELAND, OHIO CODIFIED ORDINANCES.

Charge Date:

01/06/2010

Disposition Details:

ON AUGUST 26, 2010, MTGLQ ENTERED A PLEA OF "NO CONTEST" TO A MISDEMEANOR VIOLATION OF SECTION 367.12(C) OF THE CITY OF CLEVELAND, OHIO CODIFIED ORDINANCES IN FOUR CASES FILED IN CLEVELAND MUNICIPAL COURT. RATHER THAN IMPOSE THE MAXIMUM FINE, THE CLEVELAND MUNICIPAL COURT REDUCED THE TOTAL FINE TO A SUM OF \$2,500 PER VIOLATION, OR \$10,000 TOTAL, TO BE PAID BY OCTOBER 1, 2010

Firm Statement

ON AUGUST 26, 2010, MTGLQ ENTERED A PLEA OF "NO CONTEST" TO A MISDEMEANOR VIOLATION OF SECTION 367.12(C) OF THE CITY OF CLEVELAND, OHIO CODIFIED ORDINANCES IN FOUR CASES FILED IN CLEVELAND MUNICIPAL COURT. THE CLEVELAND ORDINANCE REQUIRES A SELLER OF REAL PROPERTY TO FURNISH TO THE PURCHASER A CERTIFICATE OF DISCLOSURE ADDRESSING THE CONDITION OF THE PROPERTY BEFORE ENTERING INTO A CONTRACT FOR SALE; EACH VIOLATION OF THE ORDINANCE CARRIES A MAXIMUM FINE OF \$5,000. RATHER THAN IMPOSE THE MAXIMUM FINE, THE CLEVELAND MUNICIPAL COURT REDUCED THE TOTAL FINE TO A SUM OF \$2,500 PER VIOLATION, OR \$10,000 TOTAL. NOTE: FAILURE TO PROVIDE THE CERTIFICATE OF DISCLOSURE REQUIRED BY THE CLEVELAND ORDINANCE WAS DUE TO A MISUNDERSTANDING OF THE REQUIREMENT AS APPLIED TO PARTICULAR TRANSACTIONS.

End of Report



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