

# **GO-FUND'S ANTI-MONEY-LAUNDERING POLICY**

Version 1-2-0

Taking into account obligations imposed by Directive 2015/849 of THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 May 2015 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, amending Regulation (EU) No 648/2012 of the European Parliament and of the Council, and repealing Directive 2005/60/EC of the European Parliament and of the Council and Commission Directive 2006/70/EC as amended by Directive 2018/843 of the EUROPEAN PARLIAMENT AND OF THE COUNCIL of 30 May 2018 amending Directive (EU) 2015/849 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, and amending Directives 2009/138/EC and 2013/36/EU (hereinafter the "Directive"), GO-FUND Management and Financing Ltd sets forth the Anti-Money-Laundering Policy (hereinafter AML Policy) as follows:

GO-FUND Management and Financing Ltd (hereinafter "GO-FUND") hereby acknowledges the significance of prevention of the money laundering, terrorist financing and is willing to make its best efforts to prevent itself, including GO-FUND's customers and employees, from assisting money laundering, terrorist financing or other similar illegal activities.

The GO-FUND's management will make its best efforts actively search for any suspicious activity and will report it to the responsible authorities. It is the policy of the GO-FUND to prohibit and actively prevent money laundering, terrorist financing or other similar illegal activities. GO-FUND shall take all reasonable steps to prevent persons who are believed to be conducting such activities from using the GO-FUND Website ([www.go-fund-ico.com](http://www.go-fund-ico.com)) or the GFC cryptocurrency that is to be sold in predefined quantities in the form of Coin (later referred to as "Coin" or "GFC Coin") or any other service provided by GO-FUND to conduct or assist such activity.

This AML Policy will be reviewed and updated periodically as necessary to keep up with changes in applicable laws and new risks.

## 1. DEFINITIONS

### **Money laundering shall be understood:**

- a) as the conversion or transfer of property, knowing that such property is derived from criminal activity or from an act of participation in such activity, for the purpose of concealing or disguising the illicit origin of the property or of assisting any person who is involved in the commission of such an activity to evade the legal consequences of that person's action;
- b) the concealment or disguise of the true nature, source, location, disposition, movement, rights with respect to, or ownership of, property, knowing that such property is derived from criminal activity or from an act of participation in such an activity;
- c) the acquisition, possession or use of property, knowing, at the time of receipt, that such property was derived from criminal activity or from an act of participation in such an activity;
- d) Participation in, association to commit, attempts to commit and aiding, abetting, facilitating and counseling the commission of any of the actions referred to in points (a), (b) and (c).

Money laundering shall be regarded as such even where the activities which generated the property to be laundered were carried out in the territory of another European Union member state or in that of a third country.

**Terrorist financing** means the provision or collection of funds, by any means, directly or indirectly, with the intention that they be used or in the knowledge that they are to be used, in full or in part, in order to carry out any of the terrorist offences understood as for example: attacks upon a person's life which may cause death; attacks upon the physical integrity of a person; kidnapping or hostage taking, causing extensive destruction to a government or public facility, a transport system, an infrastructure facility, including an information system, a fixed platform



located on the continental shelf, a public place or private property likely to endanger human life or result in major economic loss, seizure of aircraft, ships or other means of public or goods transport, manufacture, possession, acquisition, transport, supply or use of explosives or weapons, including chemical, biological, radiological or nuclear weapons, as well as research into, and development of, chemical, biological, radiological or nuclear weapons, release of dangerous substances, or causing fires, floods or explosions, the effect of which is to endanger human life, interfering with or disrupting the supply of water, power or any other fundamental natural resource, the effect of which is to endanger human life, illegal system interference and threatening to commit any of the aforementioned acts with the aim of seriously intimidating a population, unduly compelling a Government or international organization to perform or abstain from performing any act, seriously destabilizing or destroying the fundamental political, constitutional, economic or social structures of a country or an international organization.

## **2. RISK ASSESSMENT**

The development and implementation of an effective AML Policy must be based on a risk assessment. For this reason, GO-FUND shall be required to conduct a risk assessment by identifying and documenting the risks inherent to its business organization, products, Coins, the customers to whom the products and services are offered, transactions performed by these customers, the geographic locations of the GO-FUND operations and all the other relevant risk factors, in accordance with a standard risk assessment methodology. The aim shall be to determine the risk profile of – including but not limited to – group of customers, country of residence of customers, type of transactions.

Particular attention is to be given to all activities of purchasers or users from high risks profile groups. All the purchasers and users deemed to belong to the high risk profile group might be required to provide additional documents to prove their identity, credibility and trustworthiness.

GO-Fund's money laundering risk assessments shall be updated on a regular basis as necessary.

### **3. CUSTOMERS' DUE DILIGENCE**

The person who registers in the Website and/or purchase Coins shall be later referred to as "Customer". Therefore, according to the applicable laws and regulation, GO-Fund shall:

- a) identify the Customer and verify the Customer's identity on the basis of documents, data or information obtained from a reliable and independent source;
- b) identify the beneficial owner ("beneficial owner" means any natural person(s) who ultimately owns or controls the Customer and/or the natural person(s) on whose behalf a transaction or activity is being conducted and/or any natural person(s) who exercise or have the right to exercise significant influence or control over a company/trust/firm);
- c) assess and, as appropriate, obtain information on the purpose and intended nature of the business relationship;
- d) conduct ongoing monitoring of the business relationship including scrutiny of transactions undertaken throughout the course of that relationship to ensure that the transactions being conducted are consistent with the GO-FUND's knowledge of the Customer, the business and risk profile, including where necessary the source of funds and ensure that the documents, data or information held are kept up-to-date.

#### **4. REQUIRED CUSTOMER INFORMATION**

GO-FUND will collect all the relevant data of the Customer in order to identify him/her and to prevent him/her from conducting or assisting money laundering, terrorist financing or other similar illegal activities

The Customers shall also fill the “Know Your Client” questionnaire (hereinafter “KYC”) with accurate and complete information. GO-FUND shall obtain all necessary information in order to be able to assume that true identity of the customers is known. This might require – under particular circumstances – providing necessary documents or “face-to-face” contact with the Customer. A person is not to be accepted as Customer, if the identification process is incomplete or if there is a reasonable doubt that the information, documents or other materials which were provided are false, inaccurate or incomplete.

Enhanced verification and monitoring procedure might also be applied to persons carrying out transactions of significant value as established in the European Union Directive 2015/849 as amended by the Directive 2018/843 or in any other applicable laws.

#### **5. RECORDKEEPING**

GO-FUND will document the verification, including all identifying information, provided by a Customer, as well as used methods of collecting data and its evaluation. GO-FUND will maintain records confidentially containing the description of any document that was relied upon on to verify a customer's identity, noting the specific information of the document. GO-FUND shall also maintain a record of transactions conducted with the Customers, as well as – as far as possible and practicable – record of transactions using Coins.

Records of data obtained for the purposes of the Customer's identification must be kept for at least five years after the business relationship has ended. Records





of all transaction data must be kept for at least 5 (five) years following the carrying out of the transactions or the end of the business relationship.

## **6. MONITORING FOR SUSPICIOUS ACTIVITY**

GO-FUND will monitor a sufficient amount of activity to permit identification of suspicious activity. GO-FUND ensures that the transaction monitoring is conducted to detect unusual or suspicious activities.

Determination of an activity being unusual or suspicious shall be a subjective assessment based on information provided for identifying the Customer, financial behavior of the Customer, as well as – if applicable – financial behavior of the transaction counterparty of the Customer. All activities that are (after initial assessment) difficult to fully assess and properly categorize, shall be rapidly considered unusual and therefore potentially dangerous.

## **7. INTERNAL CONTROL**

GO-FUND shall also monitor and control Company's employees, staff members, freelance workers and other affiliated persons in order to discover and report activities believed to be involved in money laundering, terrorist financing or other similar illegal activities. Whenever there is an internal suspicion of such activity, the suspected person (or group of people) shall provide a sufficient explanation. Until suspected person (or group of people) proves – beyond reasonable doubt – that he/she/they were not involved in such activities, he/she/they shall not be allowed to further carry on with their duties conducted for the GO-FUND.

## **8. REPORTING THE SUSPICIOUS ACTIVITY**

If a person is believed to be conducting or assisting money laundering, terrorist financing or other similar, illegal activities by the use of the GO-FUND Website, Coins or any other service provided by the GO-FUND, such activity shall be immediately reported to the responsible authorities. All reasonable steps are to be undertaken in order to block or suspend abovementioned activity (or activities) and to mitigate its detrimental effects.

## **9. TRAINING**

GO-FUND shall take reasonable steps to ensure that appropriate training is provided to new and existing employees, staff members, freelance workers and other affiliated persons. Training shall raise awareness of the problem of money laundering, terrorist financing and other similar illegal activities, awareness of its consequences and measures to be taken to properly detect, report and block such activities, as well as mitigate effect of such activities. Alternative methods of training such as e-learning training might also be used.

The AML Policy shall be available to all employees, staff members, freelance workers and other affiliated persons. Each staff member must understand it and become familiar with its contents. Updates to the AML policy shall be uploaded to GO-FUND's Website and shall be communicated as soon as they become available.