



## **Anti-money Laundering, Counter-terrorist Financing § Eligibility Policy**

### **Introduction**

GoMeat Services Ltd., with UIC 206518336, having its seat and management address at Sofia, post code 1124, Bulgaria, Sredets District, 9 Viktor Hugo Str., hereinafter referred as GoMeat, is not among the obliged entities which, according to the applicable European and in particular the Bulgarian legislation, should apply the measures for prevention of the use of the financial system for the purposes of money laundering and terrorist financing regarding its clients.

Notwithstanding the above mentioned, for the purposes of the legitimate interests pursued by GoMeat to prevent its activity to be involved in any kind of illegal activity including but not limited to money laundering and terrorist financing as well as the public interests for prevention of abuses, GoMeat will implement effective Anti-money Laundering /AML/ and Counter-terrorist Financing /CFT/ internal procedures and mechanisms.

One of the international standards for preventing illegal activity is customer due diligence /CDD/. According to the CDD, GoMeat establishes its own verification procedures within the standards of AML and KYC frameworks.

### **1. Identification**

GoMeat's identity verification procedure requires the User to provide GoMeat with national ID/ international passport or driving license, whose validity has not expired.

GoMeat has the right to collect and store User's identification information for the AML/KYC Policy purposes.

In order to identify the User, the following data will be collected:

- the full name /first and last names/ of the User;
- the date and place of birth;
- an official personal identification number or other unique element for establishing the identity, contained in an official identity document, the term of validity of which has not expired and on which there is a photo of the client;
- any citizenship that the person possesses;
- country of permanent residence and address (mailbox number is not sufficient);
- current address (mailbox number is not sufficient).

In connection with the above identification, GoMeat will collect copy of the presented identity document (ID card/ passport/ driving license).

User's identification information will be processed strictly and in accordance with GoMeat's Privacy Policy and applicable regulations.

### **2.High risk third countries**

GoMeat accepts that certain third countries have been identified by the European Commission as having strategic weaknesses in AML measures and legislation and these third countries have been



listed in Commission Delegated Regulation (EU) 2020/855<sup>1</sup> and / or Commission Delegated Regulation (EU) 2016/1675<sup>2</sup>.

In this regard GoMeat has the right not to establish business relationship with Users, who are residents or citizens of Afghanistan, The Bahamas, Barbados, Botswana, Cambodia, Ghana, Iraq, Jamaica, Mauritius, Mongolia, Myanmar/Burma, Nicaragua, Panama, Syria, Trinidad and Tobago, Uganda, Vanuatu, Yemen, Zimbabwe, Democratic People's Republic of Korea (DPRK), and Iran, or any other high-risk third countries which have provided a written high-level political commitment to address the identified deficiencies and have developed an action plan with FATF or has the right to apply certain measures of enhanced due diligence regarding to these kind of Users.

### **3. Eligibility**

GoMeat will deny services to the Users, who are residents or citizens of other third countries such as United States of America, China, Canada, and South Korea due to the threat of imposing regulatory or other sanctions to GoMeat.

### **4. Politically exposed person /PEPs/ and affiliates**

GoMeat accepts that there is an increased risk of entering into business relations with individual who is or has been entrusted with a prominent public function /PEPs/, family members of PEPs and also individuals who are closely connected to PEPs, either socially or professionally /close associates/.

In this regard GoMeat will require from the Users to declare if they are or have been PEPs or family members of PEP or close associate of PEP. GoMeat can deny services to PEPs and affiliates.

### **5. Identity verification**

GoMeat may take steps to confirm the authenticity of documents and information provided by the Users. All legal methods for double-checking identification information can be used and GoMeat reserves the right to investigate certain Users who have been determined to be risky or suspicious. GoMeat may require additional information from suspicious or risky Users, including documents regarding the origin of their funds.

GoMeat reserves the right to verify User's identity in an on-going basis, especially when their identification information has been changed or their activity seemed to be suspicious (unusual for the particular User). In addition, GoMeat reserves the right to request up-to-date documents from the Users, even though they have passed identity verification in the past.

### **6. CFT verification**

GoMeat will not provide services to Users who have been identified by the competent authorities as having access to terrorism or its financing or who have been subject to sanctions for terrorism or terrorist financing. Therefore, GoMeat will check the Users in lists of European and global counter-terrorism organizations.

### **7. Origin of funds**

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<sup>1</sup> Commission Delegated Regulation (EU) 2020/855 of 7 May 2020 amending Delegated Regulation (EU) 2016/1675 supplementing Directive (EU) 2015/849 of the European Parliament and of the Council

<sup>2</sup> Delegated Regulation (EU) 2016/1675 supplementing Directive (EU) 2015/849 of the European Parliament and of the Council



GoMeat will provide services only to Users who can prove that their origin of funds is from a legal source. In this regard, Users will be required to declare the origin of funds used in the business relationships.

This Policy was last updated on 10<sup>th</sup> June, 2021. We may change its contents by updating this page to reflect changes in applicable legislation or GoMeat KYC practices.