

Anti-bribery policy

Keeping registration, verification and membership free from improper influence.

Draft for ASMRAF review - Version 0.2 - 14 October 2026

Prepared for the South African launch. These are proposed rules, not confirmation that legal arrangements, staff or services are in place.

1. Core rule

Under this proposed policy, no person acting for ASMRAF may offer, request, promise or accept an improper benefit to influence a decision. This includes money, gifts, travel, employment, discounts, donations or favours, directly or through someone else. It applies to staff, assessors, committee members, contractors and agents.

2. Free registration and independent decisions

Miners pay nothing to register, receive a MUCC code or undergo ASMRAF verification. Nobody may charge to accelerate, activate or upgrade a code. Membership funding is separate from verification. A membership purchase, sponsorship claim, founding-member relationship or commercial introduction gives no preferential assessment or decision-making right.

3. Gifts and hospitality

Do not accept cash or cash equivalents. Decline benefits from an applicant or interested party while their decision is pending. Other gifts or hospitality need prior written approval by a person without a conflict, with purpose, value, parties and decision logged. In the absence of an approved limit, decline rather than assume permission. Do not split expenses or use personal accounts to evade controls.

4. Third parties and payment requests

Check the identity, authority and role of agents and suppliers, and document their work and payment terms. Reject unexplained commissions, false invoices and requests to redirect payments without independent verification. Do not make facilitation payments. If a demand is accompanied by an immediate threat to safety, prioritise safety, preserve a factual record and report it promptly; never conceal it as an ordinary expense.

5. Reporting and response

Report concerns to the integrity lead through a secure route; info@asmraf.org can be used to request that route. If the concern involves the lead, an unconflicted governing-body member must handle it. Preserve evidence, limit access and protect good-faith reporters from retaliation. Investigations must be fair and separate from those implicated. Make external reports when legally required.

6. Controls and accountability

Keep gifts, expenses, conflicts and incident registers. Use named authority and a second check for sensitive approvals. Apply proportionate consequences under lawful employment and contractual procedures. Train personnel before they work with applicants and review risks, incidents and the policy at least annually. Publish factual outcomes only when safe and lawful.

Before adoption

Appoint the integrity lead and alternate escalation contact, approve gifts/expenses rules and secure reporting channels, and adopt training and investigation procedures.

Proposed accountable role: ASMRAF integrity lead. Record named appointments and an adoption date before operation.

References

[UNODC Business Integrity Portal](#)

References inform this draft; they do not imply endorsement or certification of ASMRAF.