

Conflicts of interest policy

How interests are declared, reviewed and kept out of verification decisions.

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. What counts as a conflict

This proposed policy covers actual, potential and reasonably perceived conflicts. Examples include ownership, employment, fees, debts, family or close personal relationships, gifts and competing advisory roles involving a mine, buyer, provider or applicant. A person may have a conflict without acting dishonestly; the duty is to disclose and manage it.

2. Declare before acting

Each staff member, assessor and decision-maker must declare relevant interests on appointment, annually, before every affected case and whenever circumstances change. Record the organisation or relationship, its nature, affected work and date. Do not publish private financial or family details unnecessarily. Maintain a controlled register and a proportionate public summary after approval.

3. Independent assessment

An unconflicted person decides whether reassignment, recusal or another control is required. The person declaring the interest does not approve their own management plan. Where independence cannot be protected, do not proceed with the assignment. Record the decision, reviewer and reasons.

4. Recusal in practice

A recused person must not review the evidence, influence colleagues, vote, approve status changes or receive confidential case material beyond what is necessary. Identify a replacement with suitable competence and record the remaining decision authority. If the committee cannot make a valid decision without the conflicted members, escalate or defer the case rather than manufacture approval.

5. MinePay and funding separation

MinePay is a technology provider and takes no part in ASMRAF verification decisions. Corporate, industry and individual memberships are ASMRAF's only funding sources. Membership, commercial fees and referral opportunities must not determine a mine's verification outcome. Founding-member recognition does not automatically grant assessment or governance authority.

6. Reporting and review

A person can question independence without retaliation. Request a confidential reporting route through info@asmraf.org; an unconflicted governing-body member must handle allegations involving the normal reviewer. Record the concern and action, restrict unnecessary access and review affected decisions if a conflict was undisclosed. Review this policy annually and following significant governance changes.

Before adoption

Confirm the governing body, decision authority, quorum and alternate reviewers; collect declarations and establish the interests register.

Proposed accountable role: ASMRAF governing body. 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.