

# Due diligence policy

How ASMRAF proposes to identify risks, assess evidence and make independent 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. Purpose and scope

This proposed policy applies to ASMRAF staff, assessors and verification decision-makers, and sets expectations for participating mines and providers. It supports responsible mineral sourcing; it does not replace government licences, the buyer's own checks or legal duties. Registration, MUCC codes and ASMRAF verification are free to miners. Corporate, industry and individual memberships are ASMRAF's only funding sources.

## 2. The verification file

Create one controlled file per mine, linked to its MUCC code. Identify the applicant, their authority to represent the mine, the mine's location and lawful operating rights. Record sources, dates, reviewer and limitations. Confirm permissions for the specific activities and minerals, rather than treating any permit as permission for every activity. A provisional code records registration only.

## 3. Risk assessment

Use a documented risk assessment covering serious human-rights abuses, child and forced labour, armed-group involvement, abusive security practices, bribery, false origin claims, money laundering, taxes and royalties. Also assess safety, environmental harm and community concerns. Compare official records, interviews, site observations and lot evidence. An assay identifies material characteristics; it does not by itself prove lawful origin or ownership.

## 4. Decisions and corrective action

Record each finding, severity, evidence and proposed action. Credible serious-abuse or armed-group risks require escalation and suspension of verification or associated sourcing recommendations while assessed; an ordinary improvement plan is not a reason to overlook them. For remediable gaps, agree a named action owner, deadline and evidence for closure. Do not close a finding because a document was uploaded. Record the independent review and reasons for every outcome.

## 5. Independence and continuing checks

Only expressly authorised ASMRAF personnel may change verification status. Anyone with a financial or personal interest must disclose it and step out. MinePay is a technology provider and has no verification vote. Reassess after material changes, serious incidents or credible complaints. When status changes, record whom to notify, what they need to know, delivery and follow-up; do not disclose confidential allegations unnecessarily.

## 6. Accountability

The proposed approach follows the OECD sequence of management systems, risk assessment, response, independent audit and reporting. Appoint qualified reviewers and an independent auditor before describing those arrangements as operational. Publish proportionate summaries without personal identities or precise mine locations. Keep a decision log, corrective-action register and complaints route; review this policy annually and after a serious incident.

### Before adoption

Appoint the verification lead and decision body, approve country-specific checks, commission independent audit arrangements and adopt the records schedule.

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

## References

[OECD minerals due diligence guidance](#)

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