Preamble & Scope

This Protocol establishes a common set of rules and documents for the lawful extraction, movement, storage, sale, and export of gold originating in African producer states.

It is intended to support:
- Government adoption (as a regulation, ministerial directive, or annex to mining law)
- Field implementation by miners, aggregators, exporters, refiners, vaults, transporters, and customs officers
- Third-party audits by accredited verifiers, buyers, or donor programs
- Low-tech or digital recordkeeping (paper, Excel, secure database, etc.)

This version is published in plain-text, operational language for use by legal teams, compliance officers, customs agents, and field implementers.

Definitions

Participant: Any person or entity handling gold under this Protocol.
KYC Record: The verified identity profile of a Participant.
Gold Lot: A uniquely identified quantity of gold (ore, doré, bars, grains) that moves as a single documented unit.
Certificate of Origin (COO): An official document issued at the point of first tagging.
Transfer Record: A signed document capturing a change in custody.
Export Certificate (EC): A government-endorsed document authorizing a Gold Lot for export.
High-Risk Supply: Gold from conflict areas, illegal trade zones, or labor violations.
Assay Report: Verifies weight and purity before export.
Vault Custody Receipt: Confirms secure storage of a Gold Lot.
Tag ID: A serialized identifier used for traceability.

Participant Registration & KYC / AML

Who Must Register:
- Artisanal and small-scale miners
- Aggregators, traders, refiners, vaults, exporters
- Financial institutions funding gold trades

Minimum KYC Data includes:
- Legal name, ID, beneficial owners, address, license number

Verification:
- Check against ID registries, sanctions lists, adverse media

Thresholds:
- Cash transactions greater than or equal to $10,000 must be documented
- Enhanced Due Diligence for PEPs, high-risk zones, or large transactions

Chain-of-Custody (CoC) Requirements

Tagging:
- Each Gold Lot receives a Tag ID and Certificate of Origin
- Sealed or stamped at source

Transfer:
- Each change in custody recorded on TR-01 with signatures/thumbprints

Aggregation:
- Only allowed at licensed refineries; original tags referenced

Tamper Checks:
- QR/tag scanned and verified at checkpoints

ESG & Risk Screening

Minimum Standards:
- No mercury pouring
- No child labor
- No mining in protected areas
- No support to armed groups

High-Risk Lots:
- Quarantined and investigated
- Requires clearance by an authority

Assay Verification & Vault Custody

Assay:
- Done at accredited labs
- Assay Report (AR-01) confirms weight and purity

Vault Custody:
- Vault issues Custody Receipt (CR-01)
- Dual control, insurance, CCTV required

Monthly logs sent to regulators

Export Certification & Customs Clearance

Documents Required:
- Exporter KYC, COO, all TR forms, Assay, Vault receipt, tax proof

Customs:
- Verifies documents, seals the lot, logs Export Certificate (EC-01)

Copies go to:
- Exporter, Customs, Central Bank, AGX Registry

Audit & Reporting

Internal:
- Quarterly self-audit with Compliance Attestation (CA-Q)

External:
- Annual third-party audits of 10% of files

Authorities:
- Must be able to inspect documents within 48 hours

AGX:
- Publishes annual stats (non-personal data)

Sanctions & Penalties

Violations include:
- Missing KYC
- Broken custody
- Mercury use or child labor
- Smuggling

Penalties:
- Lot seizure, fines, suspension or blacklisting
- Appeals reviewed within 30 days

Annex A – Standard Forms

KYC-01: Participant Registration
COO-01: Certificate of Origin
TR-01: Transfer Record
REF-01: Refinery Merge Sheet
AR-01: Assay Report
CR-01: Vault Receipt
EC-01: Export Certificate
CA-Q: Compliance Attestation

Annex B – Minimum Data Schema

```
{
"tagId": "TAG-20250503-00123",
"lotId": "LOT-GH-20250503-0001",
"origin": {"mineId": "ASM-GH-045", "gps": "6.852,-1.292", "date": "2025-05-03"},
"weightGrams": 1024.5,
"purityKarat": 22.5,
"assayRef": "AR-000345",
"vaultReceipt": "CR-007892",
"custodyTrail": [
{"from": "ASM-GH-045", "to": "TRADER-001", "date": "2025-05-04", "trRef": "TR-0456"}
],
"documents": ["COO-0123", "TR-0456", "AR-000345", "CR-007892", "EC-000321"]
}
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