

## **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": {"minId": "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"]
}
```