

**SPECIMEN · ACADEMIC PROJECT · NOT A VALID LICENCE OR PERMIT**

Responsible Gold Supply Chain Policy

Relevant authority: **AfriShield Gold Ltd board (hypothetical)**

Legal basis: OECD Due Diligence Guidance for Responsible Supply Chains of Minerals

Policy owner	Compliance Officer
Reference	SPEC-AFG-POL-0006
Review cycle	Annual, or after any red-flag event

1. Commitment

We will not tolerate, profit from, contribute to or facilitate serious human-rights abuses, direct or indirect support to non-state armed groups or public or private security forces acting illegally, bribery, fraudulent misrepresentation of origin, or money laundering.

2. Management systems

A named compliance officer, a KYC procedure for every counterparty, and chain-of-custody records kept for at least five years.

3. Risk assessment

Every source is mapped and checked for red flags: conflict-affected location, unlicensed sellers, unexplained volumes or cash-only terms.

4. Risk mitigation

Red-flag lots are suspended until resolved; supplier relationships are ended where risks cannot be mitigated.

5. Audit and reporting

Independent third-party audit of our due diligence and an annual public report on our supply chain.

Issued for: classroom demonstration of the documents a legitimate gold trader would hold. No crest, seal or signature of any authority is reproduced.