



Public Complaints and Appeals Procedure

Ensuring complaints are resolved in a fair and transparent way

Version 4 – January 2020

The Public Complaints and Appeals Procedure document shall be reviewed every 5 years

Official language: English

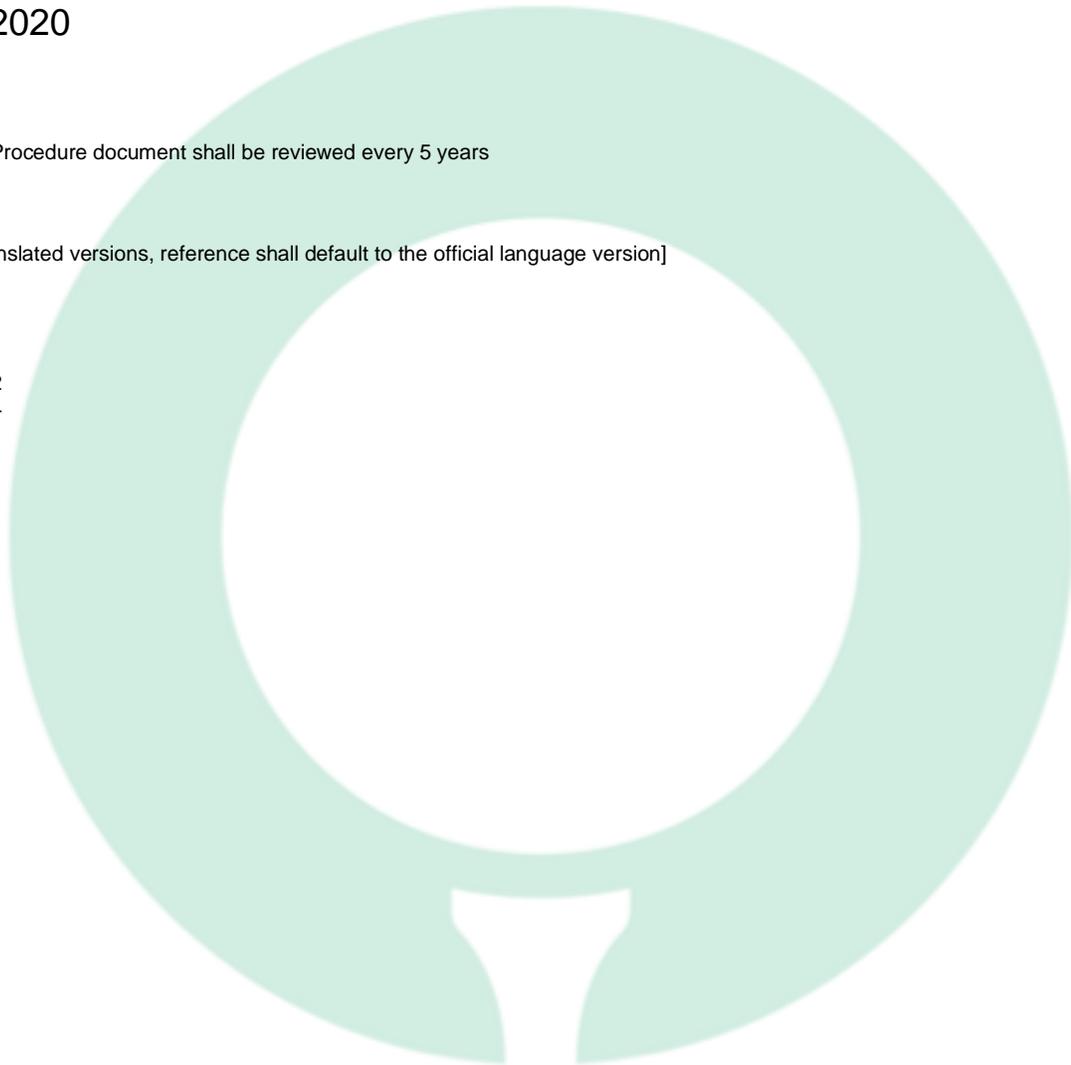
[In case of inconsistency between translated versions, reference shall default to the official language version]

Superseded versions:

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1. Introduction and Scope

GEO Foundation (GEO) is an international not-for-profit, non-government organisation founded for and dedicated entirely to influencing golf's social and environmental performance through a voluntary and stakeholder supported standard and certification programme.

When problems arise, these complaints procedures ensure they are resolved in a fair, transparent way. Any public complaint made against GEO's certification criteria; processes, procedures, certification awards or any other work conducted by GEO shall be managed following the process detailed in 1 below. Any complaint or appeal by a golf facility concerning their award or note of certification shall follow the "2. Golf Club Certifications Decisions Complaints and Appeals" procedures outlined on page 4 below. Communication between the complainant and GEO is primarily in English through email, however, alternative methods of communication may be used as and when deemed appropriate by GEO and to ensure this process is accessible to all stakeholders.

All complaints are recorded in a central complaints log (see Appendix 2) that is maintained by the GEO staff. Information about the complaint filed and how it was resolved is recorded and maintained in the complaints log. This log may be viewed upon request and confidentiality will be maintained in that the name of the complainant will not be shared with any party outside of GEO.

2. Public Complaints Process

Complaint submitted to GEO through contact details above or on GEO's website (<https://sustainable.golf/contact>). The complaint should contain basic information about the person submitting the complaint, details about the complaint, evidence to support the complaint, and expected outcomes.

- a) GEO will assess the complaint and determine the appropriate member of staff that will be able to resolve the complaint and is not in any way connected to the complaint.

If any stakeholder (other than the golf club itself) makes a complaint directly related to a certification decision, GEO shall pass the complaint to be managed by GEO CERTIFICATION LTD. ("GEO Cert. Ltd"), which will consult with the golf facility and auditor (also known as verifier for the purposes of this document) in question, to obtain full supplementary information concerning the complaint.

The assigned staff member will review the complaint and conduct any fact finding that may be required to determine the accuracy of the complaint against information held and maintained by GEO.

The assigned staff member will contact the complainant in writing with the results of their fact finding and provide information on the next steps that will be taken by GEO to address the complaint or to provide

clarification if there is a misunderstanding in the processes or operation of GEO that resulted in the complaint being filed.

If this does not result in an outcome that is satisfactory to the complainant within 30 days from the time the complaint was submitted, the complainant may ask for the issue to be referred to the GEO Board for a resolution.

If the complaint is substantive, i.e. concerns a specific GEO standard or criteria, the complaint will be referred to GEO's Advisory Council, which in turn can consult with a relevant Expert Group (i.e. the Regional Working Group, or the New Developments Working Group). As per ISEAL alliance's Standard Setting Code, substantive complaints relate to the content of the standard and are dealt with through the standard development and revision process. The Advisory Council will decide if the complaint is substantial enough to trigger an emergency standard setting public consultation, or the complaint will be recorded for the next planned standard setting, or simply further guidance for application of GEO's standard is required.

Procedural complaints relate to the way in which the standard was developed. These can include complaints about the process for deciding on the content of the standards, but not about the content of the standard itself. GEO's Board will oversee an investigation, with further advice sought from the Advisory Council and other stakeholders if required (e.g. ISEAL).

If the public complaint refers to a specific certification decision and no resolution is found through GEO's internal investigation above, the complainant reserves the right to request that a peer-review of the certification decision is undertaken.

The GEO Cert. Ltd Board will refer to the Advisory Council to appoint a verifier (independent verifier/auditor from the GEO network), who has no connection with the golf facility or the original independent auditor (verifier) and has relevant local technical knowledge to investigate and audit the documentation submitted by the golf course for certification. The peer review audit shall be conducted within 3 months, and a final recommendation shall be submitted to the Advisory Council.

The Advisory Council shall in turn submit their final recommendation to uphold the complaint or not, based on this peer review report, the original reports and documentation, and any other interviews and investigation they deem necessary, which shall be submitted to the GEO Cert. Ltd Board for final approval.

A written final response by GEO Cert Ltd Board to the complainant shall include:

- Findings from the investigation or peer review
- Next steps in resolution: e.g.
 - Change in Golf Facility's Certification status: removal of Certification, change to "certification pending" or complaint not upheld and the golf facility continues to be OnCourse certified.

- Start consultation process for revision of standard criteria and/or guidance.
- Start consultation on revision of GEO's process or procedures.
- Disciplinary action against the the verifier (as per the Verifier Code of Conduct and Contract).

In response to the above the golf facility may request to start level 1 proceedings outlined below in the Golf Club Certification Decisions- Complaints and Appeals Procedure.

3. Golf Club Certification Decisions - Complaints and Appeals Procedure

Object and Purpose

The purpose of the GEO Complaints and Appeals Procedure is to provide an orderly, structured, transparent and impartial process by which objections by golf facilities to their verification recommendations and subsequent certification decisions, can be resolved.

The purpose of this Golf Club Certification Decisions - Complaints and Appeals Procedure is to determine whether GEO Cert Ltd or the Verifier made an error in judgment, evaluation or recommendation that materially affected the outcome of a GEO certification determination.

This procedure is open to golf clubs formally enrolled in the GEO OnCourse® programme and applying for the GEO Certified ecolabel for golf club and course management.

Members of the GEO accredited verifier Network have recourse as described in the verifier Code of Conduct and Contract document, which handles grievances, disciplinary action, and sanctions to members of the verifier Network.

Complaints relating to golf club certification determinations by the public or other stakeholders shall follow the Public Complaints Procedure above.

Process Overview

The Procedure comprises three main stages:

1. Collaborative Resolution;
2. Level One Appeal;
3. Final Appeal.

The process is designed to give GEO and programme participants a fair, impartial and inclusive opportunity to resolve disagreement and dispute amicably and professionally.

Stage One – Collaborative Resolution

All complaints or concerns are invited, in the first instance to be submitted to GEO Cert Ltd Customer and Partner Relations staff.

Complaints will be discussed openly and directly with the complainant, with a view to early stage positive and amicable agreement.

If this is not possible, complaints will be referred to the GEO Cert's Senior Management team for further consideration and opportunity for resolution, and an initial GEO position on the matter outlining the suggested steps to resolution, shall be sent to the complainant.

If this continues not to satisfy the complainant, the complainant may submit a Notice of Complaint to GEO Cert Ltd detailing in full, clearly and specifically the nature of their complaint, concern, disagreement or dispute.

GEO Cert Ltd will respond acknowledging receipt of Notice of Complaint within 5 working days.

Within 10 working days of receipt of the Notice of Complaint, GEO Cert Ltd will initiate direct written communication with the complainant to seek an immediate resolution, based on a compromise that meets the needs of both parties and remains within the principles, ethos, and expectations of the programme – as set out in and inferred by GEO's programme content, guidance and evaluation criteria.

The complainant will be afforded the opportunity to provide further written explanation of specific grievances, supported by additional reports, photographs, testimonials and other contextual and specific supporting information that they would wish GEO Cert Ltd to take account of.

When a verifier is involved in the complaint, GEO Cert Ltd will also liaise directly and take opinion from the verifier Verifier that provided the original verification, evaluation and recommendation. GEO Cert Ltd will establish facts and opinion that have led to the existing recommendation from the Verifier.

GEO Cert Ltd will produce, and present to the objector, a summary written response (Complaint Position Statement) within 20 working days of receipt of the initial Notice of Complaint. The GEO Position Statement will seek to present a workable way forward in as many cases as possible, but ultimately will have to uphold the principles, ethos, expectations, and criteria for sustainable golf facility management and development.

If the complainant is satisfied with the outcome of the GEO Position Statement, a written response from the complainant will ensure the content of the Position Statement will act as the agreed basis for moving forward. After this point, the Position Statement will not be open to further deliberation or negotiation. The complainant may wish to suggest amendments to the Position Statement, which will be openly and fairly considered by the GEO Executive Director. No more than one iteration of the Position Statement is permitted.

[In the event that a Notice of Complaint is filed, no formal certificate or logo licensing agreements may be issued or entered into relating to any place or product until the complaints procedure has run its course in accordance with the procedures set out in below].

Collaborative Resolution Costs: A fixed and non-negotiable fee of €TBC – Eur or £TBC can be imposed by GEO Cert Ltd to cover administrative time in processing the written Notice of Complaint. This covers the costs of corresponding directly with the complainant and Verifier, and for the production of an official Position Statement on the certification decision.

Stage Two – Level One Appeal

If the GEO Position Statement fails to meet with the agreement and satisfaction of the objector, a further two stages in the appeals process provides the opportunity for further evaluation, review and determination of the verification recommendation and GEO Cert Ltd decision.

A Level One Appeal is triggered on receipt of an official Notice of Level One Appeal from the complainant. To initiate this process, the complainant must submit a written Notice of Level One Appeal to GEO Cert Ltd within ten (10) working days of the receipt of the GEO Position Statement.

Within 15 working days of the receipt of Notice of Level One Appeal from the complainant, GEO Cert Ltd will notify the complainant that the Level One Appeal Process has commenced.

This correspondence will inform the complainant that a Peer-reviewer (verifier), drawn from the verifier Network, and completely unattached to the golf facility, will be appointed to review the case. (In the case of instigation of a Level One Appeal by a golf facility following the public complaints procedure above, a verifier different from the original peer-review will be appointed). The appointment is made by the Chair of the GEO Cert Ltd Board of Directors, in consultation with the GEO 's Executive Director.

The decision of the Board in appointing the adjudicator shall be final.

The adjudicator shall perform all the functions allocated to him or her in accordance with direct guidance from the GEO Executive Director and the procedures and methodology set out in the verifier overview document and within GEO's impartiality statement. The Adjudicator will examine the claims made by the complainant, will review all documentation and statements, and will make a written finding as to whether GEO made an error that materially affected the outcome of its original Position Statement.

If any such error is identified, and if there is adjudged to be a real possibility that GEO may have come to a different conclusion, the Independent Adjudicator will remand the Position Statement back to GEO for reconsideration, with clearly defined reasons. Alternatively, the Independent Adjudicator may uphold the content of the GEO Position Statement and original decision.

In the event that the Adjudicator requests further clarification from the complainant, the Adjudicator shall notify the complainant in writing of the clarification sought and the time limit for responding (which, in the absence of special circumstances to justify a longer time, should normally be not more than five days). If the complainant fails to respond within the time specified, it shall be assumed that the complainant does not wish to proceed further and the Independent Adjudicator shall thereupon issue a notice to GEO of the situation, and GEO will be entitled to issue a notice in writing dismissing the complaint.

The Adjudication review will take place within one month from the date that the complainant has been

notified that the Level One Appeals process has commenced.

The Adjudicator's review will culminate in a written Level One Appeal Adjudication Report that is submitted to GEO for consideration by the Executive Director, and Chairs of the GEO Advisory Council and the GEO Board of Directors.

GEO will submit an official Level One Appeal Determination, based on the findings and recommendations of the Adjudication Report, to the complainant within three calendar months from the commencement of the appeals process.

The complainant will have four weeks from receipt of the GEO Level One Appeal Determination to declare their satisfaction or otherwise. If the objector is satisfied with the GEO Level One Appeal Determination, which should be made absolutely clear in the complainant's return correspondence, the Determination will provide an agreed roadmap to progress and an official agreed final position on the matter.

Level One Appeal Costs

The Level One Appeal Costs comprise both administration and Adjudication fees. Both must be remitted to GEO (by credit card, cheque or bank transfer) at the time an appeal is requested. GEO shall not initiate the Level One Appeal Process until payment has been received in full. If payment is not received within thirty (30) days after the submission of Notice of Level One Appeal, such appeal and all subsequent appeal rights shall be canceled.

Administration (in all cases) - €TBC Adjudication (in all cases) - €TBC

No Adjudicator may (a) review any matter in which his or her impartiality might reasonably be questioned or (b) review any matter, which presents an actual or apparent conflict of interest relating to the project.

If the complainant remains unsatisfied with the outcome of the Level One Appeal Determination, the complainant will have recourse to initiate a Final Appeal by submitting a written Notice of Final Appeal to GEO.

[In the event that a Notice of Level One Appeal is filed, no formal certificate or logo licensing agreements may be issued or entered into relating to any place or product until the complaints procedure has run its course in accordance with the procedures set out in below].

Stage Three – Final Appeal

A complainant may initiate a Final Appeal in order to challenge a Level One Appeal Determination. Final Appeals are restricted to complainants who disagree with the Level One Appeal Determination, and who wish to argue the validity of the ruling without exploring alternative compliance paths. Final Appeals can

only commence once the Level One Appeal process has been exhausted.

Final Appeals only commence on receipt of a Notice of Final Appeal from the objector. The complainant must submit a written Notice of Final Appeal to GEO within twenty (20) working days after receiving the Level One Appeal Determination.

GEO will acknowledge receipt of the request for a Final Appeal within 5 working days of receipt of the Notice.

The GEO Cert Ltd Board of Directors, in consultation with the GEO Executive Director and Chairs of the GEO Advisory Council (and any other relevant Expert Group chair if necessary – see Appendix 1 Governance Structure), shall appoint three persons to serve on the Final Appeal Panel, each of whom shall be qualified by virtue of training and experience to have the appropriate technical knowledge in the relevant GEO programme.

The Final Appeal Panel shall make a final and binding determination on all determinations pertaining to the performance of the complainant in relation to the principles, ethos, expectations and criteria for sustainable golf facility management.

No member of the Final Appeal Panel may (a) review any matter in which his or her impartiality might reasonably be questioned or (b) review any matter, which presents an actual or apparent conflict of interest relating to the venue in question.

GEO shall notify the complainant of the names of those persons serving on the Final Appeal Panel, and the complainant shall notify GEO within ten (10) working days of receipt of such names whether the complainant questions the impartiality of any member of the Final Appeal Panel. The Chair of GEO's Board of Directors shall determine whether to disqualify any member from serving on the Final Appeal Panel.

In the event of disqualification, the Chair of the GEO Board of Directors will designate another individual to serve on the Final Appeal Panel. The Chair of the GEO Board of Directors, in consultation with the GEO Executive Director and Chair of the Advisory Council shall designate the Chair of the Final Appeal Panel.

All Final Appeals must be submitted in writing and sent to GEO by traceable email, mail or delivery service. The appeal must specify a valid basis for the appeal, but may not offer documentation other than that previously proffered to GEO.

The Final Appeal Panel will endeavor to meet within sixty (60) calendar days of the Notice of Final Appeal being submitted to GEO.

It shall render a decision, including a brief description of its reasons, based on the record of all previous resolution efforts - without an oral hearing.

GEO will endeavor to (but does not guarantee) deliver the decision on the Final Appeal within ten (10) working days of the meeting of the Final Appeal Panel. Decisions of the Final Appeal Panel shall be by consensus (defined as the absence of sustained opposition amongst Panel members).

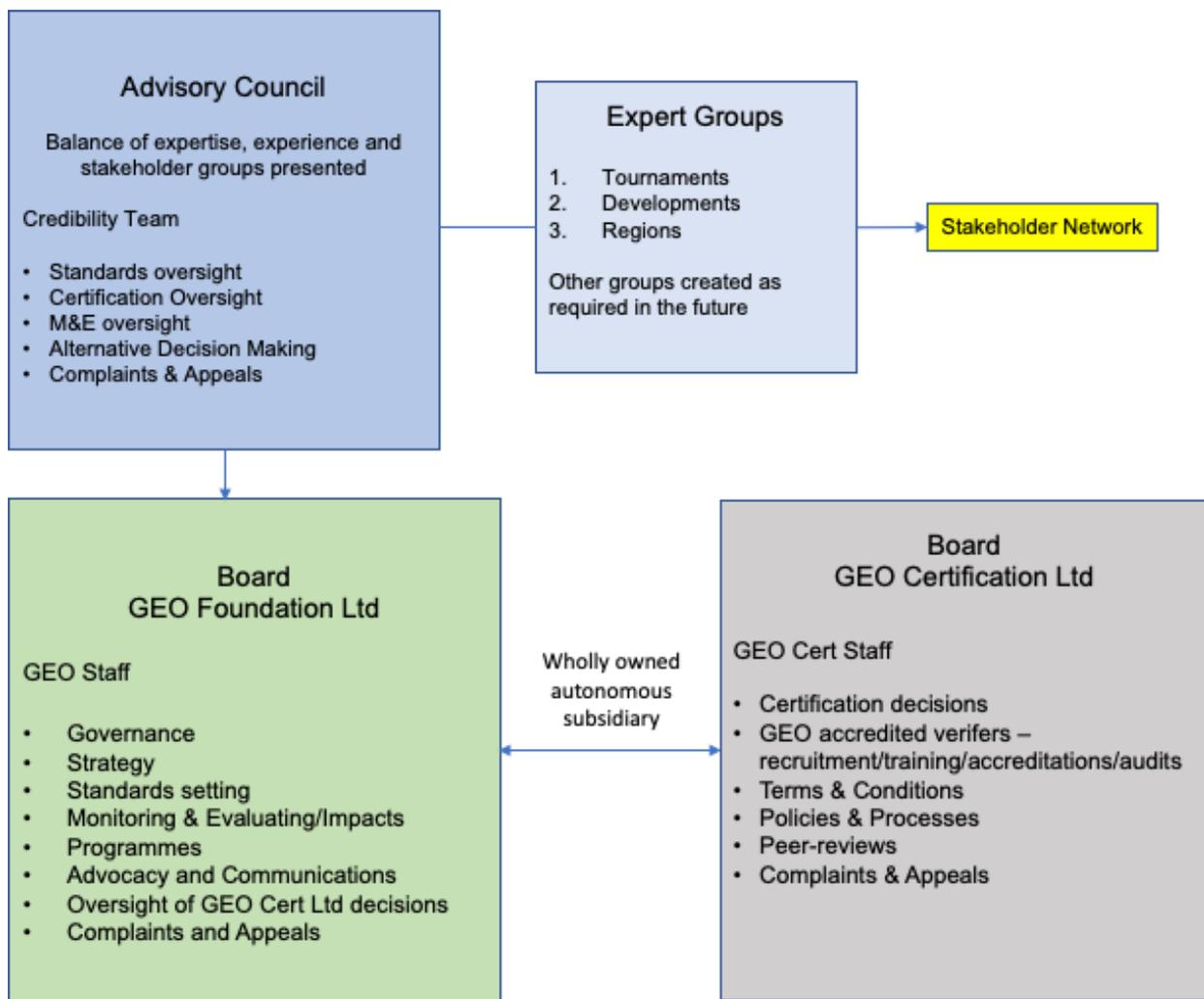
The official, written Determination of the Final Appeal Panel will be released to the complainant and shall be final in all cases.

Final Appeal Fees

The Final Appeal Fee is a fixed flat fee. Fees must be remitted to GEO by credit card, cheque or bank transfer at the time an appeal is requested. GEO shall not initiate the Final Appeal Process until payment has been received in full. If payment is not received within thirty (30) days after the submission of Notice of Final Appeal, such appeal shall be canceled and no further appeal considered. The cost for Final Appeals is €3,000 in all cases.

[In the event that a Notice of Final Appeal is filed, no formal certificate or logo licensing agreements may be issued or entered into relating to any place or product until the complaint procedure has run its course in accordance with the procedures set out above].

Appendix 1: GEO Governance Structure



[End of Document]