

Verifier Code of Conduct and Contract

Enabling the network of GEO Verifiers to maintain professionalism and apply their knowledge to certification processes at the highest standard

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

The independent accredited verifier network is an international network of sustainability professionals representing a diversity of specializations within the sport of golf. The technical knowledge of the network is relied on to promote verification and advisory services to clubs interested in GEO programmes. GEO has adopted a code of conduct to articulate standards of conduct for candidates seeking to become and remain part of the network. The code should serve as a guide for good practice and its maintenance is integral to the success of the network.

In the event of a violation to this code, network members will be notified through a written warning. In the event of a repeat offence forming a pattern of unacceptable conduct or incompetence, members will face termination from the network. The following code was adopted to establish a fair process for addressing such non-compliances.

1. General Principles

Individuals must promote high standards of ethical conduct including: To advance the honour and integrity of the conformity assessment profession, and in keeping with high standards of ethical conduct, verifiers must:

- Commit to the values and defined core principles: objectivity, professionalism, transparency, value, positivity, relevance, practicality (see Handbook sections 2.1-2.4) and ISEAL's defined principles of Assurance: consistency, rigour, competence, impartiality, transparency, accessibility.
- Act as a trusted member of the network in all relations, including those with GEO, golf facility representatives, and all other individuals and organizations encountered while carrying out the activities of a network member.
- Represent the network as a qualified, competent, knowledgeable professional during all activities.
- Represent the independence of the GEO / verifier relationship; will not imply any direct employment or relationship inconsistent with the defined 3rd party relationship.



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- Be in continuous compliance with all GEO policies¹ (as amended from time to time by GEO and posted on the website, in verifier network communications etc).
- Abide by laws related to the profession and to general public health and safety and carry out their professional work in a competent and objective manner.
- Verifiers must be a legal entity or employed by one - i.e. a legally standing associate, corporation, partnership or individual that has the legal capacity to enter into agreements or contracts and be legally accountable for activities. They shall ensure that they have the correct resources, reserves and any insurance required to maintain their operations on an on-going basis.
- Commit to continuous improvement as a conformity assessment professional.
- Maintain professional and timely communication.
- Ensure that skills, knowledge, and competence are adequate for performance functions and responsibilities defined under the role of network members.
- Maintain a high level of technical knowledge in golf's sustainability themes.
- Strive to increase the competence and reputation of the network; will represent network in a positive manner, a manner that elevates the reputation and perceived standards of the network.
- Ensure no GEO materials or intellectual property rights are misappropriated.
- Ensure any translation of audit reports is undertaken by individuals independent of the golf facility applying for certification. If this is not possible the name of the individual responsible for the translation will be disclosed within the certification / verification material.
- Maintain accurate and up-to-date profile information.
- Respect the beliefs and opinions of other people, recognize social diversity and treat everyone fairly.
- Not disclose information concerning confidential business affairs or proprietary

¹ GEO rules and policies will be amended from time to time. It is the responsibility of individuals to remain knowledgeable of the rules and standards set by GEO.



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information with either GEO, or any other organization, without proper consent from the facility.

- Not outsource to another organisation or individual, parts or all any activity related to certification, verification, reporting and auditing of the audit or certification reporting.

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2. Relations with GEO, Public, and Clients

- Will treat all clients and applicants for certification equally and in a non-discriminatory manner.
- Will not engage with members of the public in a manner that knowingly creates a potential conflict of interest.
- Will not verify any facilities that may involve a potential conflict of interest.
- Will promptly, openly and honestly inform GEO about all circumstances that could potentially influence the impartiality of a verification report as and when they arise; in addition to an evaluation of the relationship and level of impairment, this extends to include circumstances that could be perceived by others to influence judgment.
- Will not accept compensation from more than one party for the same service without the consent of all parties.
- Understand the terms and conditions defining advisory work and verification work (see definitions); will not verify facilities ineligible to verify in accordance with such terms and conditions.
- Will not imply that certification would be simpler, easier, faster, or less expensive if hired for consultancy services.
- Will require facilities to disclose any information regarding current enrolment with other assurance providers, on-going audits, or certification schemes.
- Will provide GEO with accurate and up-to-date information regarding current



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professional status as a member of professional organizations and associations.

- Will remain objective and independent when issuing recommendations (see Handbook).
- Will draft publicly viewable verification reports that include all relevant and pertinent information gathered during verification.
- Will ensure all translations supplied by the golf facility to English are comprehensive and accurate.
- Will take pride in performance of verification reports and draft reports that are: clear and succinct, detailed with specific observations, focused on tangible actions and results, with clearly referenced data; acknowledged limiting factors, and noted future targets.
- Will ensure auditing and verification work is covered by a legally enforceable contract with the golf facility.

Initials

3. Relations with Peers

- Will not coordinate or collude with other members or non-members under the objective of procuring verification contracts; this includes providing a recommendation of a verifier to a facility while performing advisory services; this includes any and all strategies of seeking to receive or deliver peer promotion to attain verification contracts, regardless of peer's affiliation with GEO.
- Will not engage in any activities that attempt to position competency above fellow member; will not interfere with an agreement between a client and another member in attempt to procure a contract.
- Will accept the responsibility of performing peer reviews for fellow members when requested by GEO.



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- Will carry out requested peer reviews with complete objectivity and will notify GEO if any circumstances would affect objectivity in performing a peer review.
- Will cooperate with peer reviewer in a manner that allows his/her review to complete a thoroughly and timely peer review.
- Will incorporate feedback delivered by GEO via a facility or by a peer reviewer in the interest of advancing performance and commitment to continuous improvement.
- Will seek improvement and immediate adjustment in an instance where non-conformity is recognized during a peer review.

Grounds for Disciplinary Action

GEO may deny, suspend, revoke, or take other action regarding an application or credential if an individual is not in compliance with this code.²

Grounds for disciplinary action include, but are not limited to:

- Breach in Code of Conduct
- An irregular event in connection with GEO application process
- Disclosing, publishing, reproducing, summarizing, paraphrasing, or transmitting any portion of GEO resources and materials in any form or by any means, verbal, written, electronic or mechanical, (without the prior express written permission of GEO)/ without acknowledging GEO as the rights holder of that information
- Plagiarising the work of other network members
- Providing fraudulent or misleading information

² The private life of a verifier cannot be the subject of disciplinary action unless it affects their professional work or affects the reputation of GEO or another verifier. See also section 6 below.



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- Unauthorized possession or misuse of network credentials or other intellectual property
- Associating the network with any other products, or third-party service providers
- Misrepresentation of credential status
- Failure to provide requested information in a timely manner
- Failure to inform GEO of changes, adverse actions or potential conflict of interest
- Impairment of professional performance because of habitual use of alcohol, drugs, or other substance, or any physical or mental condition
- Gross or repeated negligence or malpractice in professional work
- Failure to maintain a current professional credential as required by the jurisdiction in which the individual practices (this may include a licence, certificate, or registration)
- The conviction of, plea of guilty to, or plea of nolo contendere to a crime or offence related to public safety or the building industry
- The conviction of a criminal offence
- Disciplinary action by a licensing board related to an industry
- Failure to maintain continuous compliance with GEO standards, policies, and procedures
- Complaints from golf clubs resulting from performance or behaviour during verification process

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4. Sanctions

GEO may impose one or more of the following sanctions for a violation of this code:

- Denial or suspension of eligibility



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- Denial of credential
- Revocation of credential
- Suspension of credential
- Reprimand
- Other corrective action

In most instances, a warning will be written, documented, and issued. Second offence will result in removal from network and loss of accreditation. GEO reserves the right to bypass the warning step and remove accreditation and status as a member of the network effective immediately if the severity of the action warrants such response. GEO retains the right to communicate such sanctions.

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5. Adverse Actions

An individual must notify GEO of any development bearing on credentialing. Developments that must be reported to GEO include (but are not limited to) arrests, complaints, inquiries, indictments, and charges pending against the individual before a regional or national regulatory agency, professional certification organization, or judicial body directly relating to public health and safety or the profession, or any matter described in Section 2, above. The individual must notify GEO within ninety (90) days after he/she first learns of the development and must provide documentation of the resolution of the matter within ninety (90) days after resolution. Failure to notify will count against you in a disciplinary procedure.

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6. Whistleblowing

Members of the network are obligated to report in accordance with this Whistleblower Policy (a) questionable non-conformances of a fellow member, and (b) violations and suspected violations against the Code of Conduct.



Sustainability in and through golf Reporting Concerns

Persons concerned with possible violation of GEO rules are encouraged to contact GEO. The person should submit a written statement identifying the persons alleged to be involved and the facts concerning the alleged conduct in detail, and the statement should be accompanied by any available documentation. The identification will assist with investigating the complaint as well as keeping the individual who issued the complaint informed. The written statement may be submitted to GEO through the GEO website's contact page or through email sent to info@golfenvironment.org with the subject line 'Complaint'. The statement should also identify others who may have knowledge of the facts and circumstances concerning the alleged conduct. The person making the complaint should identify himself/herself by name, address and telephone number. However, GEO will consider anonymous complaints.

All complaints shall receive GEO's full attention. GEO will investigate each challenge or complaint and acknowledge it in writing to the complaining candidate. All comments will be kept in GEO's records. Anyone reporting a concern must act in good faith. Any reports found to be unsubstantiated and prove to have been made under malicious or reckless intentions, will be viewed as a serious offence and result in termination from the network.

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7. Disciplinary Review Procedures

A. Initial Evaluation.

- i. Upon receipt of a complaint, adverse action notice, or breach of Code of Conduct, or repeated poor performance determined by the GEO Programme Manager confer with the GEO Director of Programme Management.
- ii. If the Director of Program Management (DoPM) and Project Manager (PM) determine that the complaint is frivolous or that the adverse action is not relevant to credentialing, no further action will be taken.



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- iii. If the DoPM and PM determine that the complaint is not frivolous or that the adverse action may be relevant to credentialing, it will be forwarded to the Chief Executive of GEO for investigation.
- iv. Individuals submitting adverse action notices and persons submitting complaints will be notified of the decision of GEO arising from this internal review process.

B. Review Panel

- i. The GEO Chief Executive may decide to appoint a review panel comprised of three members, drawn from the GEO Technical Commission, Board and / or current holders of a credential offered by GEO. Panel members will have a clear understanding of GEO rules, policies and procedures, have access to staff, vendors or other participants as needed for supporting documentation. Panel members shall assure fair and thorough disposition of all appeals and must document the process accurately and completely.

* Review panel members may not: (a) review any matter in which his/her impartiality might reasonably be questioned, or (b) review any matter which presents an actual, apparent, or potential conflict of interest. Panel action consensus is defined as the absence of sustained opposition.

- ii. If the Panel determines after its investigation that the facts are inadequate to sustain a finding of a violation of eligibility for network credentials and/or GEO policies and procedures, no further action will be taken. Individuals submitting adverse action notices and persons submitting complaints will be notified of this decision.
- iii. If the Panel finds that good cause exists to question whether a violation of eligibility for network credentials and/or GEO policies and procedures has occurred, the Panel will transmit a statement of the allegations to the individual by certified mail, return receipt requested, setting forth the applicable rule and a statement:
 - a. Facts constituting the alleged violation
 - b. Panel's decision on the matter
 - c. Panel's recommended sanction



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* The decision of the Review Panel is, in all cases, final.

iv. Dismissal from the Network

- a. In the event that after all grievance and disciplinary procedures have been completed, and a verifier is approved for dismissal from the network, GEO will write explaining clearly the reasons why and stating the period of time that must elapse prior to re-application.
- b. The time period will normally be 24 months, but GEO reserve the right to alter this upwards or downwards depending on the nature of the disciplinary action.
- c. There is no Final Appeal process for dismissal from the network.

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8. Definitions

Accessibility: Verifier requests verification costs that are consistent with Verifier Costs Guide and reasonable and affordable for clubs. Verifier ensures cultural sensitivity and comprehensible language can be delivered through verification process.

Advisory: Supporting services provided by members in an advice-giving capacity: Synonyms: Consultation, Supporting.

Audit: Synonym - verification

Clients: Members of the OnCourse® programme seeking verification or supporting services.

Competence: Verifier has technical knowledge of golf industry and sustainability criteria as well as professional knowledge and understanding of verifier best practices.

Conflict of Interest: Any potential instance that influences the impartiality and objectivity of a verifier- perceived or reality. This includes any advisory services provided to the club within previous 3 years.



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Consistency: Same results are achieved by verifier when applied in different contexts. Same general processes are followed taking into consideration variables that slightly modify processes.

Consultation: Supporting services provided by members in an advice-giving capacity. Synonyms: Advisory, Supporting.

Credible: Verification performed by highly skilled and knowledgeable professional that is recognized as an accredited member of the network. Professional delivers verification under the commitment to high moral integrity and adherence to assurance principles.

Educator: One of the 4 defined roles. Non-mandatory role of educating professional organizations and networks about the sustainable golf movement.

Impartiality: Verifier seeks fair and objective assessments, and demonstrates independence from conflicts of interest.

Objectivity: Independent certification decisions based on facts, real and measurable information, not swayed by outside factors.

Organization: GEO Foundation.

Peers: Fellow members of network.

Public: Any individual or body outside GEO, the verifier network, current or potential OnCourse® members.

Promoter: One of the 4 defined roles. Non-mandatory role of promoting the sustainable golf movement to the public.

Recommendation: The resulting decision at the end of the verification process. Synonyms: evaluation, assessment, verification report.

Rigour: Verifier delivers a thorough and accurate investigation seeking knowledge and information. Evaluation criteria is followed closely to achieve comprehensive assessment of facility performance.

Transparency: Verifier displays honesty and openness about potential conflicts of interest that affect work. Verifier delivers verification reports that include all relevant and pertinent knowledge and information discovered during verification.



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Verification: Process of assessing a facility seeking certification delivered by an independent, third-party member of the verifier network. Synonyms: Audit.

9. Appendix I

ISEAL'S Defined Auditor Personal Attributes

- > **Ethical**, i.e. fair, truthful, sincere, honest, and discreet
- > **Open-minded**, i.e. willing to consider alternative ideas or points of view
- > **Diplomatic**, i.e. tactful in dealing with people
- > **Collaborative**, i.e. effectively interacts with others
- > **Observant**, i.e. actively aware of physical surroundings and activities
- > **Perceptive**, i.e. instinctively aware of and able to understand situations
- > **Versatile**, i.e. adjusts readily to different situations
- > **Tenacious**, i.e. persistent and focused on achieving objectives
- > **Decisive**, i.e. reaches timely conclusions based on logical reasoning and analysis
- > **Self-Reliant**, i.e. acts and functions independently
- > **Professional**, i.e. exhibits a courteous, conscientious and generally business-like demeanour in the workplace
- > **Morally courageous**, i.e. willing to act responsibly and ethically even though these actions may not always be popular and may sometimes result in disagreement or confrontation
- > **Organized**, i.e. exhibits effective time management, prioritization, and effectiveness



I agree to abide by the terms and conditions listed in the Code of Conduct.

Signature


