



GAP Connections Certification Program Appeals Committee and Process

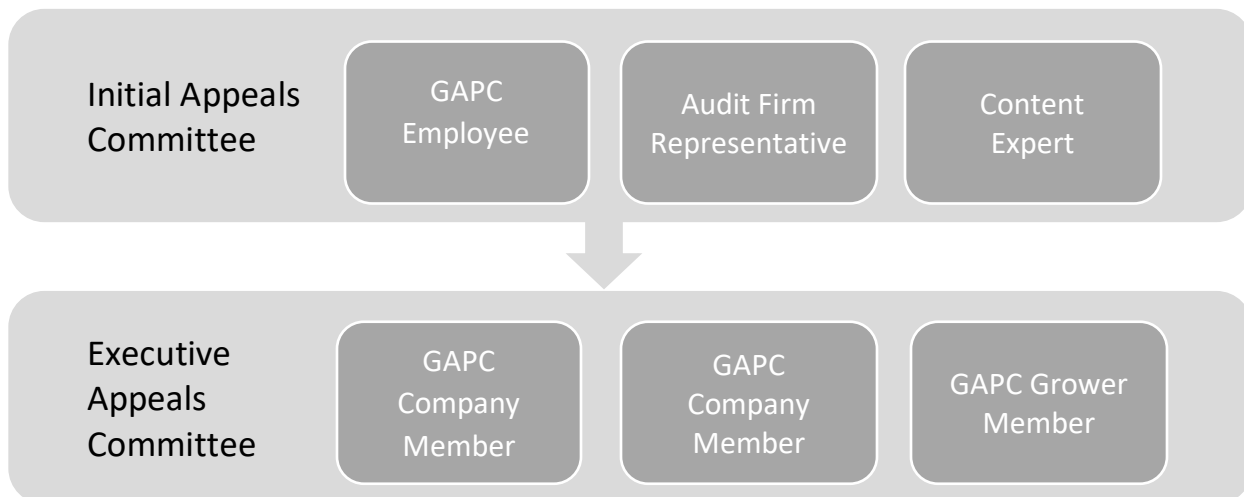
Introduction

GAP Connections (GAPC) grower members who participate in the GAP Connections voluntary certification program will undergo a third-party assessment of their tobacco production practices. In the event a GAPC grower member needs to remediate an issue that arises during an assessment such as missing documentation, GAP Connections offers a remediation process. However, there may be situations in which GAPC grower members do not agree with the certification assessment findings. Thus, GAP Connections offers an appeals process for these growers. The appeals policy requires GAPC grower members to write a formal letter to GAP Connections identifying their complaint/appeal within 30 days of an assessment. The following document outlines the appeals committee and the appeals process following the submission of the letter.

Committee Structure:

The appeals committee is comprised of two mutually exclusive sub committees. The first is the “Initial Appeals Committee” which is comprised of individuals who are not members of the GAP Connections Board. The Initial Appeals Committee consists of three members: (1) an employee of GAP Connections; (2) an employee or contractor of an approved auditing firm (other than the auditor who conducted the assessment); and (3) a content expert depending on the nature of the appeal (i.e expert in tobacco production, labor, etc.,).

The second sub-committee is referred to as the “Executive Appeals Committee”. The Executive Appeals Committee will have final say on any appeal. This Executive Appeals Committee will be an ad hoc committee of the GAP Connections Board of Directors. For any appeal, only three members of the board will serve on the Executive Appeals Committee and will be chosen based on specific tobacco type issues that may arise (i.e. flue-cured or air cured). Two members of the committee will be Regular Company Members and one will be a GAPC Grower Member.





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Appeals Process

The appeals process begins when the grower member submits an appeal with respect to his/hers certification findings. The GAPC grower member must submit a formal written appeal, any supporting documentation, and an initial appeal fee of \$200¹ to GAP Connections within 45 days of audit date. The party responsible for the remaining costs of the appeal will be dependent upon the outcome of the appeal. The GAPC grower member will pay for any additional costs if the appeal is denied (i.e. legal, investigation/review of documentation, etc.). If the appeal is approved GAP Connections will refund the initial appeal fee and GAP Connections will be responsible for any remaining costs associated with the appeals process.

Upon receiving the formal written appeal, GAP Connections will inform the Initial Appeals Committee of the appeal and call for a meeting. Throughout the appeals process, all GAPC grower member information will be removed from any documentation that goes before the committee to keep the process anonymous unless the GAPC grower member chooses to disclose his/her identity and present his/her case to the Initial Appeals Committee.

The Initial Appeals Committee will review the appeal/complaint and any supporting documentation provided by the GAPC grower member. When necessary the initial appeal committee may consult with an attorney. The responsibility of the Initial Appeals Committee will be to recommend a course of action based on the information provided by the GAPC grower member. The Initial Appeals Committee will attempt to produce a recommendation to the Executive Appeals Committee within 30 days of receiving the appeal.

Once the Initial Appeals Committee arrives at a recommendation, the Executive Appeals Committee will be notified. The Executive Appeals Committee will be provided the GAPC grower member's written appeal and supporting documents as well as the Initial Appeals Committee recommendation. Grower information will be removed so the grower in question remains anonymous. The Executive Appeals Committee will strive to render a final verdict on the appeal within 30 days of receiving the Initial Appeals Committee recommendation. GAP Connections will facilitate the meetings of the appeals committee, and will provide the verdict to the GAPC grower member. Once the verdict has been rendered the remainder of the appeals cost will be paid based on the outcome.

¹ The appeals fee will be a fixed fee paid by the grower to cover the costs of content experts and the auditor who are involved in the Initial Appeals Committee.



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