

2026

Leading Harvest Farmland Management Standard

**PGIM REAL ESTATE
2026 SURVEILLANCE II
AUDIT SUMMARY REPORT**

September 9, 2026

PGIM Real Estate
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July 30, 2024
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INTRODUCTION

This Audit Summary Report was developed by Averum, an accredited third-party certification body. Averum was engaged by PGIM in 2026 to conduct a surveillance audit on 100,000 to 250,000 acres of managed production agriculture properties to determine the effectiveness of PGIM's management system. Objectives 1–13 of the Leading Harvest Farmland Management Standard (LH FMS) were included in the scope of this audit.

Executive Summary

PGIM has performed well in demonstrating its management system's conformance to the Leading Harvest Farmland Management Standard. The properties we visited were well managed on their own with professional operators and management, with a variety of support programs from central management at their disposal. Senior management remains involved with on-farm decision making and results measurement on sites. PGIM's management and budgetary review cycle is robust and effective at identifying ongoing and emergent issues that have the potential to impact on-farm operations and results. Documentation was illustrative and provided by responsible staff. Management remained available throughout the assessment for clarifications and further responses. Overall, interview subjects were transparent and expansive in their responses. All parties have been extremely generous with their time.

Specific Focus Areas for Next Audit:

During PGIM's recertification, Averum will focus on PGIM's participation in and support of agricultural research and application of climate-smart agricultural best management practices that minimize greenhouse gas emissions.

AUDIT TEAM RECOMMENDATION

Results of the audit indicate that PGIM Real Estate has a management system that continues to meet the requirements of and is in conformance with the Leading Harvest Farmland Management System (LH FMS). PGIM's enrolled acreage is recommended for continued certification. PGIM's next recertification audit event should take place prior to their current certificate's expiration on July 30, 2027.

Corrective Action Plan(s) Accepted:	Not applicable
Proceed to/Continue Recertification:	Yes
All NCR Closed:	Not applicable



Certification Decision

Program User: PGIM Real Estate

Audit Dates: July 16, 2026–September 9, 2026

Number of Nonconformances Raised (NCRs): Major (0) Minor (0)

Certification Date: July 30, 2024

Status: Continued

Conclusion:

Results of the audit show that PGIM Real Estate has a management system that continues to meet the requirements of the LH FMS and conforms with LH FMS criteria. PGIM's enrolled acreage is recommended for continued certification.

Standard(s) Within Scope of Audit

Leading Harvest Farmland Management Standard 2025 (Objectives 1–13)



Scope of Audit

PGIM's management system that manages 100,000 to 250,000 acres enrolled in Leading Harvest overseen by Senior Asset Managers, Asset Managers, and Farm Management teams.

Accreditations:

Averum has been issued a Certificate of Accreditation by the ANSI National Accreditation Board and is accredited to ISO/IEC 17021-1, Conformity assessment - Requirements for bodies providing audit and certification of management systems, in accordance with the Leading Harvest Farmland Management Program (Leading Harvest 2025) requirements

Certification Number and Expiration:

AVERUM-LHFMS-2026-0053; July 30, 2027

Standard User Guidance–Leading Harvest Logo Usage:

Program users who are in good standing with enrolled acreage in the Leading Harvest Farmland Management Standard for all, or a portion of their operations, may use the Leading Harvest logo. Any express or implied claim that a program user is in conformance with the Leading Harvest Farmland Management Standard must be substantiated by a current, valid certification by a certification body recognized by Leading Harvest.

The Leading Harvest logo cannot be used on product labels. The use of the Averum logo is not allowed without express permission from Averum.

AUDIT PROCESS

Audit Staff

Brianna Griffith and Linnea Abel conducted the audit for Averum. All members of the audit team have experience with the Leading Harvest Farmland Management Standard, are assurance providers for multiple sustainability programs and have expertise in production agriculture on multiple crop types in the Southeast. Brianna Griffith conducted site visits. All senior members of the audit team hold training certificates in ISO 17021 (Conformity Assessment Requirements for bodies providing audit and certification of management systems) and relevant IAF Mandatory Documents, including Certification of Multiple Sites. The audit processes and reports were independently reviewed by Holly Salisbury, who is a certified public accountant in the state of California and has expertise on multiple crop types in the United States.

Company Information

PGIM is an investment management firm with significant operations in production agriculture. Farm operating tenants and management contractors are responsible for the day-to-day farmland management activities for PGIM's properties. PGIM initially achieved certification for 100% of its enrolled agricultural properties in 2021.

Since the last audit took place, no significant events have taken place that would affect PGIM's farmland management system.

AUDIT PLAN

Multi-Site Requirements

Multi-site organizations may be audited on a site-by-site basis (all sites visited each year) or, in some cases, on a sample basis. Multi-site certifications adhere to the requirements of International Accreditation Forum (IAF) Mandatory Document (MD) 1.

Averum conducts sampling in conformance with IAF MD 1 and including qualitative considerations such as the proximity of sites, functional management units, crop types, and previous conformance history.

PGIM site visits were conducted on a sample basis. PGIM's management system provides oversight and is responsible for conformance activities of sites in geographic range/description. The Chief Operating Officer and Portfolio Manager are responsible for developing corrective action plans regarding LH FMS conformance and reporting them to PGIM management. PGIM's current review and monitoring process is effective and ongoing.

PGIM 2026 Surveillance II | Audit Plan

Audit Objectives and Criteria

Objective: Conduct a Surveillance Audit to monitor the continuing conformance and effectiveness of the management system established by PGIM Real Estate (PGIM) with the Leading Harvest Farmland Management Standard 2025 Objectives and Performance Measures.

Criteria: Performance measures and indicators contained in the Leading Harvest Standard and the defined processes and documentation of the management system developed by PGIM.

Substitution or Modification of Indicators: N/A

Type and Scope of Audit (Including Organizational and Functional Units or Processes to be Audited)

Type: Surveillance audit in accordance with audit standards established by the International Standards Organization framework on auditing management systems with multiple sites (ISO 17021:1-2015, IAF MD-1).

Scope: PGIM's management system that manages 100,000 to 250,000 acres enrolled in Leading Harvest overseen by Senior Asset Managers, Asset Managers, and Farm Management teams.

Functional Units:

- Chris Jay is PGIM's COO, and Sarah Angus is a Portfolio Manager, who both lead Leading Harvest conformance efforts across the portfolio.
- Macey Graham provides administrative support including fulfilling evidence requests for LH FMS audit activities.
- PGIM's regions are divided into Western, Central, and Eastern regions. Senior Asset Managers and Farm Management teams for the Eastern region were present during site visits and included in audit activities.

Audit Team

Linnea Abel - Lead Auditor

Brianna Griffith - Auditor

Opening Meeting

July 16, 2026

Site Visits

August 11, 2026

Sites Visited/Growers Visited

- Blue Three Pecans
- Webster
- Flint River Orchards
- County Line Orchards

**Closing Meeting**

September 9, 2026

Region

Southeast represents 28% of all acreage.

Crop Types

Pecans

Audit Time

Offsite audit activities: 8 days, Auditor/Lead Auditor

Onsite audit activities: 1 day, Auditor

KEY FINDINGS

Audit Findings

Previous Nonconformance: Zero (0)

Major Nonconformance: Zero (0)

Minor Nonconformance: Zero (0)

Opportunities for Improvement: Zero (0)

Notable Practices: Five (5)

Notable Practices

1. 6.2.1 Food and Agricultural Product Waste: PGIM has on-site managers that have other business ventures that aid in processing and storing pecans. Integrating other steps in the value chain of pecans not only aids in reinforcing relationships with on-site managers but also reduces waste and inefficiency in the value stream.
2. 7.2.3 Cropland for Wildlife Habitat: Auditors identified a notable number of pollinator habitats on sites to maintain wildlife around the farmland.
3. 10.1.2 Respectful Work Environment: Multiple health and wellness programs, including PGIM's BeWell Program, encourage healthier lifestyles, which can improve productivity as well as employee health and morale.
4. 12.1.1 Performance Review: Skip-step meetings support employees by allowing them to further discuss goals and ensure that leaders are effective.
5. 12.2.1 Support for Agricultural Research: PGIM has held an annual agriculture education event for the past 30 years, informing employees and operators on current economic outlooks and other key agricultural factors.

PERFORMANCE MEASURE SUMMARY APPENDIX

1

SUSTAINABLE AGRICULTURE MANAGEMENT

1.1: Sustainable Agricultural Stewardship

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				1.1.1 1.1.2 1.1.3	

PGIM provided their Sustainability Policy, which states their overarching ESG mission as "...doing the right thing for our people, the environment, and our communities."

PGIM's Real Estate Sustainability Policy shares their group philosophy and approach to sustainability is rooted in a materiality assessment they conducted that evaluated sustainability factors that significantly influence their investment and stakeholder decisions. They further communicate their focus on building value by reducing carbon emissions and enhancing resilience.

PGIM prioritizes the acquisition of sites that are established farmland with a strong production history. PGIM may develop new sites for investors with a long-term investment horizon who are willing to wait for crop returns.

PGIM provided its Property Sustainability Due Diligence Assessment, which management uses to evaluate potential properties and document characteristics such as groundwater quality risks and existing on-site solar infrastructure.

PGIM completes soil quality tests and reviews predicted water availability for the next 15 years during the due diligence process.

PGIM provided a copy of their United Nations Principals of Responsible Investment reporting framework, which documents their stewardship approach and supporting policies and procedures.

Conformance Evidence:

Real Estate Sustainability Policy
Policies and Procedures
PRI Reporting Framework
Property Sustainability Due Diligence Assessment



1. SUSTAINABLE AGRICULTURE MANAGEMENT

1.2 Critical External Factors

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				1.2.1	

PGIM's Annual Business Plan shows consideration for relevant external factors, including water availability and usage, and local market conditions.

PGIM uses a risk management service (Munich RE) to identify site-specific risks including heat stress, drought, heavy precipitation, tornado exposure, water stress, and projected climate impacts. PGIM uses this information to understand and adapt to critical external factors that may affect long-term farm profitability and sustainability.

PGIM's Asset Management team holds monthly operation calls to review each property. Each property will communicate how things are going, the external factors that are affecting them, potential insurance claims, and their budget. The PGIM accounting team will join calls when budgets may need adjustments.

Conformance Evidence:

2026 Annual Business Plan
Munich RE Asset Risk Reports
Monthly Operations Call Tracking Log

SOIL HEALTH AND CONSERVATION

2.1: Soil Health

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				2.1.1 2.1.2 2.1.3 2.1.4	

PGIM provided stakeholders letters to confirm the pecan sites' management staff were implementing and monitoring best management practices (BMPs) published by the University of Georgia (UGA) for pecan production.

Annual nutrient and fertility management programs on orchards are implemented using BMPs, agreement requirements, and agronomic data.

PGIM Farm Managers and on-site managers confirmed that soil and tissue tests are completed annually. PGIM on-site managers adjust application rates based on findings.

PGIM farm management agreements require Farm Managers to submit soil and tissue analysis reports to PGIM management within 30 days of receipt.

One operator interviewed has a full-time agronomist as an employee that oversees nutrient management and monitors irrigation.

PGIM sites maintain budget worksheets that track past and anticipated costs related to maintaining soil health. PGIM also tracks cover crop costs in the budget worksheets.

PGIM conducts soil analysis during due diligence to determine soil type and soil quality. PGIM provided soil maps for select sites visited. Farm management is responsible for ongoing soil health monitoring.

Sites visited incorporate chicken litter as well as chipper residue to maintain soil health.

PGIM provided a list of its agricultural properties, including baseline Environmental, Social, and Governance (ESG) practices, as well as additional practices under consideration or currently being implemented.



For the sites visited, practices include no-till, cover cropping, natural plant cover maintenance, reintegration of organic matter, biological soil inputs, and utilization of calcium-based fertilizers.

Conformance Evidence:

Soil maps
Soil and Tissue Samples
PGIM UGA Recommended Pecan Production Practices letter
Farm Management Agreements
Budget worksheets
Property Sustainability Due Diligence Assessment

2. SOIL HEALTH AND CONSERVATION

2.2: Soil Conservation

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				2.2.1 2.2.2	

PGIM tracks soil amendments in budget worksheets.

Sites visited have utilized United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Soil Surveys Maps to map the soils on the sites. Surveys contain information on the soil conditions, erosion potential, drainage, wetland indicators, and agricultural suitability for the surveyed areas.

Sites visited have USDA certification confirming the tenant is aware of and subject to Highly Erodible Land (HEL) and Wetland Conservation requirements. PGIM's Farm Managers inform the on-site managers where to avoid certain practices based on the requirements.

PGIM provided an invoice for lime applications that is used to amend soil pH.

Conformance Evidence:

Budget worksheets
Soil maps
USDA Highly Erodible Land Conservation designation
USDA Highly Erodible Land Conservation and Wetland Conservation Certification
Lime invoice

WATER RESOURCES

3.1: Water Use

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				3.1.1 3.1.2 3.1.3	

Georgia's Environmental Protection Division's (EPD) Agricultural Water Withdrawal Permit authorizes groundwater withdrawals for irrigation and requires compliance with state water-use regulations.

Auditor viewed flow meters on wells that measure water usage and confirmed with farm management that the data is reported back to the water district for record keeping.

PGIM on-site managers use irrigation maps to lay out the tree varieties and see the production levels of the trees. The water amounts are adjusted based on the amount of sun and age of the trees in each zone.

PGIM conducts water testing on wells to evaluate water quality and suitability for agricultural use during due diligence.

One site visited identified a concern during due diligence related to well water. However, it was determined that the water remained suitable for agricultural use. As a result of the finding, the well water is tested at least once every two years.

One site visited uses tensiometers to measure how much water is in the soil and adjust the water schedule, accordingly.

PGIM's Farm Managers send daily weather reports to on-site managers, enabling them to remain informed about recent and forecasted weather conditions and adjust watering and spraying activities accordingly.

Sites visited take advantage of the UGA Pecan Management Calendar, which provides irrigation schedule guidance, crop water demand estimates, and recommendations for drip and sprinkler irrigation management.

PGIM provided their U.S. Agriculture Fund Limited Partnership (LP) Property List, confirming they will use micro-jet irrigation and track water usage.

One on-site manager interviewed communicated irrigation is sometimes limited to June through September, during the growing season and when water demand is highest.

One orchard visited uses sprinklers to irrigate as they require less run time and allow irrigation to be delayed until later in the growing season.



One on-site manager mows drainage ditches next to the orchard, although it is the county's responsibility, to aid in improving the water movement and reduce flooding.

Conformance Evidence:

Environmental Protection Division Agricultural Water Withdrawal Permit
Flow meters
Irrigation layout map
Property Sustainability Due Diligence Assessment
UGA Pecan Management Calendar
U.S. Agriculture Fund LP Property List



3. WATER RESOURCES

3.2: Water Quality

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				3.2.1 3.2.2	

The sites visited test irrigation water to understand water quality and make adjustments. If testing identifies a need for treatment, PGIM will work with on-site farmers to install UV light systems.

PGIM provided their U.S. Agriculture Fund LP Property List, confirming they use no-till practices.

On-site managers interviewed and their team will scout fields and adjust spraying based on weekly scout reports.

One on-site manager interviewed uses a third-party scouting service on a weekly basis. The service uses machinery to access the trees and document observed pests. The scouting reports are then used to inform spray schedules for the following week.

The auditor viewed some waterways present at the sites visited. One site visited hired a third-party to remove trash and or debris and grade the water way. PGIM provided wetland maps for select properties visited.

Sites visited demonstrate conformance with the Georgia Water Stewardship Act by maintaining permitted agricultural water withdrawals and routinely monitor groundwater use with flow meters.

Conformance Evidence:

Irrigation Water Analysis
Water Quality Report
U.S. Agriculture Fund LP Property List
Scouting Reports
Waterway Invoice
Wetland maps

CROP PROTECTION

4.1: Integrated Pest Management

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				4.1.1 4.1.2 4.1.3	

Select on-site farm management crews perform scouting to monitor pests. One farm visited uses a third-party to scout.

PGIM provided a Farm Management Agreement that documents on-site managers' agreement to comply with regulations, use approved products only, and maintain pesticide application records.

Sites visited use the UGA Pecan Management Calendar, which outlines seasonal pest scouting, monitoring, and treatment thresholds for insects, mites, and diseases common to Georgia pecan production.

PGIM provided a management attestation letter confirming that the sites visited implement UGA'S recommended pecan production practices, including integrated pest and disease management, monitoring, and treatment programs for regionally significant pests and diseases.

Sites visited experience pecan scab disease, especially on older trees. The sites visited only plant varieties that are more resistant to the disease as a mitigation practice.

Sites visited use the UGA's 2026 Commercial Pecan Spray Guide that lists pests and diseases, and the associated recommendations related to chemicals, quantities, and spray time.

One on-site manager applies a non-lethal wildlife repellent around orchards to keep wild hogs away.

Sites visited experience some crop loss from squirrels, crows, and raccoons. On-site managers tolerate them since the crop loss is minor.

Conformance Evidence:

Scouting Reports
Farm Management Agreement
UGA Pecan Management Calendar
PGIM management letter
UGA 2026 Commercial Pecan Spray Guide



4. CROP PROTECTION

4.2: Crop Protectant Management

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				4.2.1	

PGIM's Farm Management Agreement requires all pesticide, herbicide, and fertilizer use to comply with regulatory requirements and manufacturer instructions. Farm Managers must maintain pesticide use records and properly store, handle, and dispose of agricultural chemicals.

PGIM provided herbicide records that confirm chemicals are tracked and documented.

One on-site manager interviewed applies chemicals himself. PGIM provided proof of his Pesticide Applicator License (PAL).

Conformance Evidence:

Farm Management Agreement
Herbicide Records
Pesticide Applicator License

ENERGY USE, AIR QUALITY, AND CLIMATE CHANGE

5.1: Agricultural Energy Use and Conservation

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				5.1.1 5.1.2	

On-site managers interviewed maintain maintenance schedules on equipment.

One on-site manager interviewed numbers farm equipment to keep track of maintenance.

PGIM requires reports of well pump efficiency tests and water quality reports within 30 days of receipt, as per the Farm Management Agreement.

PGIM's accounting team will assess renewable energy propositions by looking at the value per acre and whether the sites are producing high yields.

Conformance Evidence:

Farm Management Agreement

5. ENERGY USE, AIR QUALITY, AND CLIMATE CHANGE

5.2: Air Quality

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				5.2.1 5.2.2	

Sites visited follow regulations for spraying and obtain wood burning permits, to comply with burning requirements.

On-site managers interviewed oversee the maintenance of equipment and use both internal mechanics and third-party vendors for maintenance and repairs.

PGIM does not own any of the farming equipment used on the sites.

Operators at sites visited use enclosed tractor cabs that help reduce operator exposure to airborne dust, when present, during field operations. Sites visited typically do not experience issues with dust.

Conformance Evidence:

Management Interviews

5. ENERGY USE, AIR QUALITY, AND CLIMATE CHANGE

5.3 Climate Smart Agriculture

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				5.3.1 5.3.2 5.3.3	

PGIM has committed to achieving net-zero operational carbon emissions by 2050 and implements greenhouse gas reduction initiatives.

On-site managers interviewed maintain maintenance schedules on equipment. Managers will use both internal mechanics and third-party vendors for maintenance and repairs.

PGIM maintains multi-peril crop insurance coverage. Insurance is active for farms that produce a minimum of 600 pounds per acre.

PGIM provided site-specific Munich RE Risk Reports that communicate exposure to acute and chronic climate risks, such as drought stress, water scarcity, and flooding. The risk reports also assess exposure based on projected future climate scenarios.

PGIM's leadership and Farm Managers may use the information provided in the risk reports to understand potential operational impacts and support preparedness planning.

PGIM's Farm Managers send daily weather reports to on-site managers, enabling them to remain informed about recent and forecasted weather conditions and adjust watering and spraying activities accordingly.

Conformance Evidence:

PGIM Net Zero Carbon Commitment
Munich RE Asset Risk Reports
Schedule of Insurance for the 2026 Crop Year

WASTE AND MATERIAL MANAGEMENT

6.1: Management of Waste and Other Materials

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				6.1.1 6.1.2 6.1.3	

Sites visited produce minimal waste. PGIM provided waste invoices with waste amounts for auditor's review.

On-site managers interviewed manage tree residues by either leaving them on site or putting them through chippers, which are then spread on sites.

On-site managers interviewed continuously reuse the cardboard wrap that is wrapped to the bottom of the trees for the first 2-3 years.

One site visited used upcycled concrete to aid erosion control in a creek on the farm. The concrete was provided by the country and came from a surrounding construction project.

Sites visited refill empty chemical totes for future use.

The auditor observed chemical storage areas at the sites with appropriate signage identifying regulated chemicals and associated hazards.

The auditor observed two gas tanks at a site visited. The tanks were located away from the shop building and water sources, as well as clearly labeled with its contents and hazard warnings, in accordance with applicable Georgia and federal storage tank regulations.

Conformance Evidence:

Waste invoices
Chipping services invoice
Pictures of concrete for erosion control
UGA Handling of Used Agricultural Chemical Containers
Regulations for On-Farm Storage Tanks in Georgia

6. WASTE AND MATERIAL MANAGEMENT

6.2: Food and Agricultural Surplus and Waste Resource Recovery

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				6.2.2	6.2.1

One on-site manager oversees both pecan farming and shell processing. The manager notes the shelling facility maintains required food safety certifications. The processing facility produces food-grade oil that is collected and reused for well maintenance.

PGIM will also use an on-site manager's cold storage facility for storing harvested pecans, as needed. This not only aids in reinforcing relationships with on-site managers but also reduces waste and inefficiency in the value stream.

Sites visited utilize chipping services to process debris. On-site crews reincorporate residues produced from the chipping services into the soil.

Sites visited apply chicken litter to soil as an amendment.

One site visited processes pecan tree residues and redistributes them back onto the fields.

Conformance Evidence:

On-site manager bios
Chicken litter and spreading invoice
Chipping services invoice

CONSERVATION OF BIODIVERSITY

7.1: Species Protection

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				7.1.1 7.1.2	

PGIM maintains property-specific documentation for endangered and threatened species, which identifies at-risk wildlife and plant species found on or near each property.

Red-cockaded woodpeckers are considered a threatened species. If they are observed, the government will mark the trees where they were found and avoid them.

Conformance Evidence:

Endangered and Threatened Species Overview

7. CONSERVATION OF BIODIVERSITY

7.2: Wildlife Habitat Conservation

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				7.2.1 7.2.2	7.2.3

One site visited has a USDA certification that indicates if they produce agricultural commodities on highly erodible land, they must obtain an NRCS-approved conservation plan. Compliance with the program also requires the operator's commitment to not convert wetlands for agricultural production.

Site maps provided indicate presence of creeks, canals, and reservoirs.

PGIM conducts Phase I Environmental Assessments (EAs) during due diligence that document physiological features of sites. Phase II EAs were used to determine potential petroleum material impacts to on-site soils.

PGIM's due diligence process identifies the presence of ecologically important sites, of which a few have been identified.

One site visited has a wetland area that is left undisturbed and kept as a pollinator and wildlife habitat.

On-site managers interviewed report that wildlife including squirrels and raccoons are commonly present on the properties and consume a minor portion of the pecan crop. Management tolerates this level of wildlife activity and recognizes these species as part of the local ecosystem.

Conformance Evidence:

USDA Highly Erodible Land Conservation and Wetland Conservation Certification
Site maps
Phase I and II Environmental Site Assessments
Wetlands maps
Property Sustainability Due Diligence Assessment

7. CONSERVATION OF BIODIVERSITY

7.3: Avoided Conversion

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				7.3.1 7.3.2 7.3.3	

Sites visited are long-standing farmland sites and are reviewed during the due diligence process. PGIM's acquisition team will commonly acquire sites that are existing farmland.

PGIM's acquisition team will complete a Property Sustainability Due Diligence Assessment. The team first completes a preliminary investment review and then a formal acquisition package including due diligence.

PGIM's Sustainable Agriculture Policies and Procedures contains a commitment to zero deforestation and defines allowable tree removals and relevant forest types.

Conformance Evidence:

Property Sustainability Due Diligence Assessment
Sustainable Agriculture Policies and Procedures

7. CONSERVATION OF BIODIVERSITY

7.4: Crop Diversity

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				7.4.1	

PGIM management maintains it takes 5 to 8 years for pecan trees to produce and recently only plant trees varieties that have a reduced susceptibility to disease and are high producing.

The visited sites' older trees that are more susceptible to disease require more water and pesticides to maintain. Site management will remove older trees if they are diseased or require disproportionate effort to remain productive.

Conformance Evidence:

Management Interview

PROTECTION OF SPECIAL SITES

8.1: Special Site Management

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				8.1.1 8.1.2	

PGIM conducts American Land Title Association surveys, Phase I & II EAs, Biological Wetland Assessments, Soil & Water Assessments, and other regionally specific assessments during the due diligence phase for new properties to identify special sites.

PGIM uses third party assessments to identify and map any special sites within the farm sites. Site maps also include location of any rivers or reservoirs. Site maps are used to understand where water sources are located and available for use, and delineations between available farmland and natural tree lines.

Conformance Evidence:

Property Sustainability Due Diligence Assessment
Phase I and II Environmental Site Assessments
Site maps

LOCAL COMMUNITIES

9.1: Economic Well-Being

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				9.1.1	

PGIM provided tax records for auditor review.

PGIM's quarterly meetings are held with the accounting team and Farm Managers and review net income, budget adjustments, and status updates with how assets are doing. PGIM provided copies of their Net Operating Income (NOI) summaries as evidence.

One site visited employs local workers as well as seasonal H2A employees.

PGIM funds a portion of the bulk chemicals that the on-site managers purchase.

Conformance Evidence:

Tax invoices
NOI review process email



9. LOCAL COMMUNITIES

9.2: Community Relations

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				9.2.1	

PGIM's Capital Agricultural Property Services participated as a sponsor in the Salute to Ag program, which supported organizations like the FFA and Boy Scouts and helps fund local scholarships.

PGIM sends a Leading Harvest Internal Member Engagement Survey to employees to track employee's engagement in their local communities and sustainable agriculture awareness.

PGIM management is actively engaged in the agricultural industry, serving on numerous boards, committees, and advisory groups, including the National Council of Real Estate Investment Fiduciaries (NCREIF) Farmland Committee, Indian River County Farm Bureau, Georgia Pecan Growers Association, Farmland Capital Alliance, and the Georgia Fruit and Vegetable Growers Association.

One on-site manager interviewed serves on the National Pecan Federation, which actively advocates for the pecan industry and supports disaster assistance, funding, and farm bill provisions to enhance pecan production.

Conformance Evidence:

Salute To Ag email
Leading Harvest Internal Member Engagement Survey

9. LOCAL COMMUNITIES

9.3: Local Communities and Indigenous Peoples

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				9.3.1 9.3.2 9.3.3	

PGIM's Sustainable Agriculture Policies and Procedures states their commitment to respect the treaty rights of Indigenous Peoples and the rights of local communities.

PGIM's Due Diligence Assessment assesses proximity of Indigenous Peoples lands. If there is are nearby areas, the process further assesses whether changes would be needed to operate the property.

PGIM employees have participated in community engagement and educational outreach activities, including Lake County Resource Conservation District field day events that involved Indigenous communities.

Conformance Evidence:

Sustainable Agriculture Policies and Procedures
Property Sustainability Due Diligence Assessment
Leading Harvest Internal Member Engagement Survey

9. LOCAL COMMUNITIES

9.4: Public Health

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				9.4.1	

On-site managers interviewed maintain that safety trainings are conducted with employees. Supplemental safety videos are also given, including demonstrations of how to properly use equipment and conduct farming activities.

One on-site manager requires all new employees to complete at least one full day of training.

Conformance Evidence:

Management Interview

PERSONNEL AND FARM LABOUR

10.1: Safe and Respectful Working Environment

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				10.1.1	10.1.2

PGIM's Equal Employment Opportunity policy commits to basing employment decisions on job-related qualifications and merit, prohibiting discrimination, harassment, and retaliation against protected groups, and outlines the responsibilities of employees, managers, and the People Team for reporting and addressing concerns.

PGIM provides Psychological Safety Guidance that encourages employees to reduce social friction, seek clarification, create space for diverse perspectives, and foster a professional and respectful work environment.

PGIM provides employees with access to mental health and wellness resources.

PGIM offers a BeWell reimbursement program, providing an annual wellness-related expense reimbursement of \$1,000 to employees. This program is designed to support activities that improve physical, mental, and emotional well-being.

PGIM utilizes multiple leadership and communication frameworks to support employee development, collaboration, and effective workplace interactions.

Conformance Evidence:

Equal Employment Opportunity Policy Psychological Safety Guidance BeWell Reimbursement Program email SCARF Model Job Aid SEEDS Model Job Aid

10. PERSONNEL AND FARM LABOUR

10.2: Occupational Training

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				10.2.1	

PGIM farm management employees are considered full-time employees.

PGIM provided an organization chart that maps and identifies individuals responsible for supporting agriculture investments and farm management.

PGIM requires employees to complete an annual Internal Compliance Training.

PGIM has a leadership training program to support employees for future leadership roles and to develop leadership skills.

Conformance Evidence:

Agricultural Equity Org Chart
Internal Compliance Training

10. PERSONNEL AND FARM LABOUR

10.3: Supporting Capacity for Sustainability

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				10.3.1 10.3.2 10.3.3	

PGIM has a formal sustainability commitment to achieve net-zero operational carbon emissions across its managed portfolio by 2050. The organization integrates ESG considerations into investment and asset management processes and maintains a multi-year strategy that includes energy efficiency improvements, renewable energy initiatives, and climate risk assessments.

PGIM leadership staff interviewed demonstrated a clear understanding of their responsibilities under the LH FMS and conveyed their ability to delegate tasks effectively to maintain program conformance.

PGIM provides annual sustainability and Leading Harvest trainings and educational programs designed to support employees' understanding of sustainability objectives and responsibilities.

PGIM's Sustainable Agriculture Policies and Procedures require in-house sustainability education training as well as external professional development opportunities, particularly for Asset Management and Farm Management personnel.

Conformance Evidence:

PGIM Net Zero Carbon Commitment
Sustainable Agriculture Policies and Procedures

10. PERSONNEL AND FARM LABOUR

10.4: Compensation

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				10.4.1	

PGIM has a formal hiring process, involving their HR team.

PGIM's employee compensation ranges, and is based on the job level and location, staying competitive with the market.

PGIM provided a Compensation Structure document, stating that compensation is based on a combination of base salary, annual performance-based bonuses, and long-term incentive awards tied primarily to investment performance. Compensation also includes comprehensive benefits, retirement and stock purchase programs, and professional development opportunities.

Conformance Evidence:

Compensation Structure

10. PERSONNEL AND FARM LABOUR

10.5 Farm Labour

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				10.5.1	

Farm Management Agreements require legal compliance with applicable laws.

One on-site manager interviewed provides the option of housing for employees as a part of their compensation.

Conformance Evidence:

Management Agreements

On-site manager compensation and housing listing

LEGAL AND REGULATORY COMPLIANCE

11.1: Legal Compliance

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				11.1.1 11.1.2 11.1.3	

One site visited has federal and Georgia labor law posters visibly displayed, providing employees with access to information regarding workplace rights, labor regulations, and compliance requirements.

Site visited also had postings of labor law and workplace compliance information in shops.

Many PGIM management employees, including on-site managers, participate in organizations that share information on applicable laws and regulations and participate in bills that would affect them.

PGIM’s Farm Managers will inform on-site farm managers about any applicable laws and regulations that may affect the farms.

Portfolio Manager and the Head of Farm Management will inform Farm Managers of federal regulations that may affect farms.

On-site managers follow UGA Pecan Extension guidance and updated resources and research that is done for pecan growers in Georgia.

PGIM maintains an Org Chart to demonstrate organizational structure to support legal compliance.

Conformance Evidence:

Federal and Georgia Labor Law posters

11. LEGAL AND REGULATORY COMPLIANCE

11.2: Legal Compliance Policies

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				11.2.1 11.2.2 11.2.3	

One site visited has federal and Georgia labor law posters visibly displayed, providing employees with access to information regarding workplace rights, labor regulations, and compliance requirements.

PGIM's new employees complete anti-harassment trainings.

PGIM also provides inclusivity trainings and psychological safety trainings.

PGIM's Code of Conduct is titled "Making the Right Choices" and contains a commitment to the International Labor Organization's (ILO's) core conventions, in which all employees are expected to adhere to.

Conformance Evidence:

Federal and Georgia Labor Law posters
Psychological Safety Guidance
Code of Conduct - Making the Right Choices

MANAGEMENT REVIEW AND CONTINUAL IMPROVEMENT

12.1: Farm Review and Continual Improvement

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				12.1.2 12.1.3 12.1.4	12.1.1

PGIM's employees set annual formal performance goals at the beginning of each year. At the end of the year employees will complete a self-review, and managers and senior managers review employees' progress as well. PGIM's leadership takes goal progress into consideration when assessing pay increases.

PGIM's Asset Management team holds monthly operations calls with each property, discussing site conditions, external factors affecting them, current yields and prices, and upcoming events.

PGIM maintains a culture of continuous feedback. The organization encourages skip-level meetings between employees and their manager's manager, providing employees with an opportunity to share work-related insights directly and discuss how they are being supported by their direct manager.

PGIM Asset Management team, the accounting team, and on-site managers update and complete budget worksheets including budget-to-actuals, CapEx requests, and operational performance.

PGIM sent the Leading Harvest Internal Member Engagement Survey to employees in the Ag Business team, recording LH community-based metrics.

PGIM's Farm Manager visits sites at least once every two weeks, checking farm progress, discussing pest pressures and potential projects. If there is a project that is considered CapEx, the Portfolio Manager will become involved.

PGIM evaluates and pilots innovative sustainability technologies and methodologies, including carbon measurement initiatives and the MyLand microalgae soil injection system, as reviewed in the 2026 Sustainability Objectives and Prior Accomplishments document provided.

PGIM's quarterly budget calls discuss potential improvement projects. PGIM's accounting team discusses net income profitability during Operational Calls as well as quarterly budget update calls. PGIM provided copies of their Net Operating Income (NOI) summaries as evidence.

Sites visited are planning more high-density pecans as they are showing higher yields and make better use of available land.

PGIM's Head of Asset and Farm Management will visit sites once every two years, at a minimum.



On-site managers interviewed expressed working with PGIM provides opportunities to evaluate and implement new management practices and technologies. PGIM has also funded partial bulk chemical purchases, saving costs significantly.

Conformance Evidence:

Monthly Operations Call Tracking Log
Budget worksheets
Capital Expenditure Recommendations
Leading Harvest Internal Member Engagement Survey
2026 Sustainability Objectives and Prior Accomplishments
NOI review process email

12. MANAGEMENT REVIEW AND CONTINUAL IMPROVEMENT

12.2: Support for Sustainable Agriculture

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
					12.2.1

PGIM's Leading Harvest Internal Member Engagement Survey tracks employees' participation in industry groups, commodity organizations, research committees, and agricultural education programs.

One on-site manager interviewed serves on advisory committees and industry boards, including the UGA Horticulture Department advisory committee.

One on-site manager interviewed has a close relationship with a UGA Professor and Pecan Extension Specialist, who does extensive research on pecans, and will inform the manager of potential disease and or pest risks in regions nearby.

One Farm Manager interviewed listens to podcasts and looks to research provided by local universities on farming practices in the area.

PGIM has begun a pilot project using Downforce Technologies that uses satellite imagery to measure soil carbon and biomass.

PGIM holds an annual agriculture education event, the Annual Agricultural Symposium, which has a 30-year history. The event holds sessions that include an economic outlook, farm bill updates, and other key agricultural factors, as well as opportunities to network for regional farmland growers, owners, and operators.

Conformance Evidence:

Leading Harvest Internal Member Engagement Survey
On-site manager bios
Downforce Technologies - GHG Accounts
Downforce Technologies - Order Forms
Annual Agricultural Symposium

TENANT/LEASED OPERATIONS

13.1: Leased-Land Management

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				13.1.1 13.1.2 13.1.3 13.1.4	

PGIM hosts an annual symposium with tenants to support collaboration and education on BMPs that support LH FMS objectives.

PGIM Farm Managers engage weekly with tenants and visit farms 4 – 6 times per year, as documented in the Tenant Engagement Overview provided. Farm Managers discuss crop mixes, planting plans, improvement projects, harvests, and lease negotiations.

PGIM's Asset Managers meet with tenants 2 – 4 times per year and discuss crop status, weather, input decisions, market conditions, and capital projects.

PGIM provided a Tenant Practices Summary as evidence of a workshop conducted in 2023 to address Objective 13 of the LH FMS and summarize tenant practices. The workshop focused on lease negotiation and execution, site visits, farm tenant and Asset Manager communication, data collection, and capital improvement oversight.

PGIM updated their lease language in 2024 to support LH FMS and provide a commitment to applying agricultural practices consistent with regional agricultural best management practices. PGIM's updated agricultural lease language clarifies PGIM's use of LH FMS as a framework to support sustainable agriculture investments.

PGIM's leases require tenants to apply good farming and sound business practices regarding property management. Capital Agricultural Property leases specify that tenants must follow recognized BMPs relevant to their locale and comply with all applicable laws, rules, regulations, statutes, guidelines, and directives. Leases include multiple requirements to operate safely and in accordance with legal requirements.

PGIM has clearly defined ESG goals that are monitored for completion. The 13 Objectives of the LH FMS are identified in leases as a portion of PGIM's sustainable agriculture goals.

Conformance Evidence:

2026 Agricultural Symposium Agenda and Thank You email
 Tenant Engagement Overview
 Tenant Practices Summary
 Agricultural Lease Form

13. TENANT/LEASED OPERATIONS

13.2: Leased-Land Monitoring

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				13.2.1 13.2.1a 13.2.1b 13.2.2	

PGIM Farm Managers regularly visit both new and established properties to review operating practices, as documented in the Tenant Engagement Overview provided.

PGIM's leadership, including Portfolio Management, Senior Executives, and Regional Managers engage with tenants. There is a concerted effort by leadership to visit sites multiple times a year, particularly during harvest season, to ensure quality control of harvested crops.

Site visits are documented in reports for select client investors. PGIM provides updates on relevant factors and communicates with tenants at least monthly.

PGIM conducts qualitative reviews of tenant performance during lease renewals or budget reviews. Tenant operations are continuously tracked, with market dynamics like crop prices impacting tenant payments being discussed with investment management.

PGIM's management meetings address concerns from tenants and review business effectiveness.

PGIM ensures efficient use of properties and BMPs, collaborating with tenants and client investors to provide concessions such as deferred payments when needed.

PGIM issues strategic plans for sites that include long-term strategies, performance to date, current outlooks, opportunities and challenges, and necessary decisions to be made.

Farm and Regional Managers take photos and complete site evaluations for portfolio managers to reference. The site evaluations include site conditions, relevant market conditions and potential impacts, areas of concern or opportunity, and recommended follow ups.

The portfolio team shares site evaluation forms with portfolio managers for assessment. The management team addresses CapEx decisions and on-site management issues like disease or pest pressures.

PGIM's tenant selections are impacted by whether tenants employ advanced and progressive practices, as determined in tenant reviews and site inspections. PGIM provided the Tenant Practices Summary as evidence of this.



PGIM has maintained the same site visit frequency for several years, supported by monthly operation calls, quarterly budgeting calls, and issue-based management reviews.

Conformance Evidence:

Agricultural Lease Form
Tenant Engagement Overview
Tenant Practices Summary
Site Inspections
Property strategic plans