



# **Manulife Investment Management Agriculture Services (Australia)**

**Brisbane, QLD**

LEADING HARVEST FARMLAND MANAGEMENT PROGRAM  
2025 AUDIT SUMMARY REPORT: SURVEILLANCE II

**23 December 2025**



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## EXECUTIVE SUMMARY

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**Certification Date:**

December 13, 2023

**Recertification Due Date:**

December 13, 2026

**Certification ID Number:**

AVERUM-LHFMS-2023-0013

Manulife Investment Management Agriculture Services (Australia) has performed well in demonstrating its management system's conformance to the Leading Harvest Farmland Management Program. The farm and regional managers operated the farms in a responsible and sustainable manner and were generous with their time.

Manulife has strengthened its risk management procedures through the expansion of its enterprise-wide risk register, the integration of climate, sustainability, social, QA, operational and HR-related risks, and the development of heat-map reporting to support strategic decision-making. Reporting across the business has been enhanced through more consistent use of VelocityEHS, regular monthly and quarterly performance reviews, and improvements to budget, water, and operational reporting.

On-farm management continues to demonstrate good agricultural practice through proactive adoption of improved monitoring systems, increased certification and accreditation uptake, strong implementation of biodiversity and community programs, and steady advancement of sustainability initiatives aligned with Leading Harvest's objectives.

# EXECUTIVE SUMMARY

(Continued)

Manulife

LH FMP 2025 AUDIT SUMMARY REPORT

## TEAM LEADER RECOMMENDATIONS

<b>Audit Dates:</b> 11/11/2025 – 23/12/2025	
<b>Corrective Action Plan(s) Accepted:</b> Yes	<b>Date:</b> 08/12/2025
<b>Follow-Up Visit Needed:</b> No	<b>Date:</b>
<b>Proceed to/Continue Certification:</b> Yes	<b>Date:</b> 23/12/2025
<b>All NCR Closed:</b> Yes	<b>Date:</b> 23/12/2025

## AUDIT STAFF

**Lead Auditor:**  
Matt Armstrong

**Audit Team Members:**  
Jemma Lawrence (Auditor), Sarah Barrett (Independent Reviewer)

## AUDIT SCOPE

**Standard(s) Audited Against:**  
Leading Harvest Farmland Management Program 2025

Surveillance of Manulife Investment Management Agriculture Services (Australia)’s (Manulife) management system of production farmland on direct and lessee-operated properties to monitor conformance with Leading Harvest Farmland Management Standard Objectives 1–13, and Performance Measures, and Indicators therein.

**Accreditations:** Approval by Leading Harvest to provide certification audits

**Number of Certificates:** 1

**Proposed Date for Next Audit Event:** Recertification to be completed in November 2026

**Audit Report Distribution:** Kristy Hart, kristy\_hart@manulife.com

## INTRODUCTION

This report summarises the results of December 23, 2025, audit conducted on Manulife Investment Management Agriculture Services (Australia)'s (Manulife) direct and lessee managed properties. The audit was led by Matt Armstrong, Lead Auditor for Averum. Matt Armstrong has had experience with Leading Harvest throughout its development and is an assurance provider for multiple sustainability programs. Site visits and audit activities were conducted by Jemma Lawrence, Field Auditor. Jemma Lawrence has had experience with Leading Harvest throughout its pilot program in Australia, and has expertise in sustainable production, various agricultural production systems, and many Australian crop types. All senior members of the audit team hold training certificates in ISO 17021:2015 (Conformity Assessment), 14001:2015 (Environmental Management Systems), and/or IAF MD-1:2018 (Certification of Multiple Sites). The audit process and reports were independently reviewed by Sarah Barrett, who has expertise with the Leading Harvest standard and varied agricultural production systems.

## SCOPE AND OBJECTIVE

In 2025, Averum was engaged by Manulife to perform a surveillance audit of sustainability performance on 20,000 - 50,000 hectares of managed operations and determine conformance to the principles, objectives, performance measures, and indicators of the Leading Harvest Australian Farmland Management Program 2025 (LH FMP 2025). LH FMP 2025 objectives 1 through 13 were covered during site visits on properties in Queensland, South Australia, and Tasmania. There was no substitution or modification of LH FMP 2025 performance measures.

Throughout the course of our engagement, it was determined that gathering additional information via meetings or correspondence with government agencies, community groups, affected Indigenous Peoples and conservation organisations was not required. Information provided during the course of our audit was determined to be sufficient to address relevant indicators of the LH FMS.

## COMPANY INFORMATION

Manulife is an independent agricultural investment firm. Manulife's farm management staff and third-party tenant operators are responsible for the day-to-day farmland management services for Manulife's properties. Manulife opted to certify 100 percent of their agricultural properties in 2023, allowing them to engage in broader sampling and simplifying the process of maintaining their certification in the future.

Manulife engaged Averum to provide surveillance audit services on their properties in 2025. For the 2025 surveillance audits three (3) sites in Queensland, South Australia and Tasmania were selected, with three (3) farm managers and two (2) regional managers included. Managers overseeing decision making and standard compliance for sample regions were contacted for evidence requests and interviews. The properties in these regions provide a representative sample of current practices and management decision making. The main crops produced on the sites are almonds, wine grapes, and macadamias. Some parts of the Tasmanian site are still under development from broadacre to wine grapes.

**AUDIT PLAN**

An audit plan was developed and is maintained on file by Averum. An online portal was established for Manulife coordinators to upload evidence and documentation securely for auditor review, and evidence was continuously uploaded throughout the audit. An opening meeting was held on November 11, 2025, preceding site visits. Following the meeting, a preliminary document review of the provided evidence was conducted by Averum. Field sites in Tasmania, South Australia and Queensland were examined on November 13, 21 and December 3, 2025, respectively. A closing meeting was held on December 23, 2025.

Throughout the audit engagement, information and communication technology (ICT) was employed for a variety of tasks. In addition to evidence submission, SharePoint was used to provide feedback on observation and notes, and for multiple levels of audit team reviews and signoffs. Throughout the audit engagement, conference calling technology (including Microsoft Teams, etc.) was leveraged for meeting with clients, conducting management interviews, follow-up interviews, and opening and closing meetings. As Leading Harvest engagements are geographically decentralised, the use of ICT was deemed not only appropriate, but necessary.

**Opening Meeting: Conference Call**

November 11, 2025

**Attendees**

Manulife:

Kristy Hart, Shelley Juner, Steven Scutter, Jessica Lott, Baden Mills, Megan Lobban, Joel Jamieson

Audit Team:

Matt Armstrong, Jemma Lawrence

**Topics**

The following topics were discussed and presented by Auditor Jemma Lawrence during the Opening Meeting:

- Introductions of participants and their roles
- Introduction of audit team
- Status of the previous audits
- Audit plan
- Expectations of program user staff
- Method of reporting

## Closing Meeting: Conference Call

December 23, 2025

### Attendees

Manulife:

Kristy Hart, Andrew Strahley, Megan Lobban

Audit Team:

Matt Armstrong, Jemma Lawrence

### Topics

The following topics were discussed and presented by Auditor Jemma Lawrence during the Closing Meeting:

- Opening remarks
- Statement of confidentiality
- Closing summary
- Presentation of the audit conclusion
- Major Nonconformances
- Minor Nonconformances
- Opportunities for Improvement (OFIs)
- Notable Practices
- Report timing and expectations

## MULTI-SITE REQUIREMENTS

Manulife maintains direct and lessee operations on multiple properties in Queensland, Victoria, New South Wales, Tasmania, and South Australia. Manulife qualifies for multi-site sampling since the properties within the management system are centrally controlled and directed by regional management, with regular monitoring activities. The HSE Risk Manager is responsible for developing corrective action plans regarding LH FMP 2025 conformance and report them to Manulife's management. Manulife's current review and monitoring process is effective and ongoing.

Field visits and observations are conducted based on a sample of regions each year. Sampling methodology is provided in the LH FMP 2025. In accordance with International Accreditation Forum Mandatory Documents (IAF-MD) methodology, all sites were initially selected at random with consideration of any preliminary examinations and then coordinated to ensure representative coverage of the complexity of the portfolio, variance in sizes of properties, environmental issues, geographical dispersion, and logistical feasibility.

**AUDIT RESULTS**

Overall, Manulife's operations conform to the objectives of LH FMP 2025. Interviews and document reviews were performed to determine procedural and documentation conformance to the LH FMP 2025. Documentation of practices was continuously supplied throughout the audit when requested. Documentation from multiple sites was provided to and reviewed by auditors. Field visits were performed on three operating sites in Tasmania, South Australia, and Queensland. Visits were conducted during the growing season on the properties, and while development was underway on areas of the Tasmanian properties. Central management representatives, as well as the regional and farm managers, were present and interviewed to illustrate Manulife's conformance and policy implementation. Central office staff with roles that impact LH FMP 2025 conformance were interviewed to determine awareness of and support for LH FMP 2025 conformance, and to illustrate company practices and procedures not performed by regional and farm managers. Manulife's Health, Safety and Environment (HSE) Risk Manager and HSE Advisor served as the guides and the HSE Risk Manager was available throughout the entire engagement, providing logistical support and honoring evidence requests wherever needed.

**Region**

The properties visited in Tasmania, South Australia and Queensland represent 3% of their enrolled property acreage.

**Crop**

Wine grapes  
Almonds  
Macadamias

**Properties Examined During Engagement**

Three (3) sites visited during the audit

- Ambrosia
- Attis Farms
- Gregory

**Management Population**

- Two (2) regional managers
- Three (3) farm managers

## KEY FINDINGS

FINDINGS IDENTIFIED DURING THE AUDIT	
PREVIOUS NONCONFORMANCE	Zero (0)
MAJOR NONCONFORMANCE	Zero (0)
MINOR NONCONFORMANCE	One (1)
OPPORTUNITIES FOR IMPROVEMENT	One (1)
NOTABLE PRACTICES	Five (5)

### PREVIOUS NONCONFORMANCE

Manulife achieved initial certification to Leading Harvest in December 2023. During initial certification and surveillance audits no minor non-conformances were identified. Opportunities for improvement identified during initial certification and surveillance audits were monitored in subsequent years.

### MAJOR NONCONFORMANCE

**ZERO (0)**

### MINOR NONCONFORMANCE

#### 3.1.1 WATER WITHDRAWAL

A breach of a water licence condition relating to extraction of the licenced water volumes occurred. Non-conformance corrective action plan has been approved by Averum.

### OPPORTUNITIES FOR IMPROVEMENT

#### 11.1.2 STANDARD USER COMPLIANCE PROGRAM

The ongoing response to the water licence breach investigation and improvements to the compliance program to prevent occurrence occurring again will be reviewed in 2026.

## NOTABLE PRACTICES

### 1.2.1 CRITICAL EXTERNAL FACTORS

Manulife's risk management assessment process has been further expanded to include a greater variety of risks. The risk assessments are now used to create heat maps for properties and their relative risks to assist with internal risk management.

### 6.1.2 RESOURCE RECOVERY

Manulife has a recycling program across their portfolio and have completed an extensive resource recovery effort at one of their sites to enable recycling of inherited dripline polypipe which would have otherwise ended up in landfill.

### 7.1.2 SPECIES AT RISK PROTECTION

Biodiversity management plans are in place for all farms and actions are implemented by farm managers.

### 9.2.1 COMMUNITY ENGAGEMENT

Extensive engagement occurs within the local community of each property, and a pay it forward scheme is implemented within the business, allowing employees to contribute to charities of choice. Following the implementation of a new decision-making process for sponsorships, Manulife has awarded the highest percentage of the community contributions budget to date.

### 10.3.1 SUSTAINABILITY POLICY COMMITMENT

Manulife continues to show a commendable commitment to the Leading Harvest program through both their Australian business, attending conferences and events with Leading Harvest to advocate for the standard, and with their portfolio including the first certified management system in Canada and a long-standing certified system in the United States.

# KEY FINDINGS

(Continued)

Manulife

LH FMP 2025 AUDIT SUMMARY REPORT

## REVIEW OF PREVIOUS AUDIT CYCLE

Manulife was initially certified to the Leading Harvest Australia Farmland Management Standard in 2023 with the first-year surveillance audit held in 2024. The surveillance audit in 2024 identified one opportunity for improvement.

## **FINDINGS ORGANISED BY PERFORMANCE MEASURE**

The following are summarised findings organised by LH FMP 2025 performance measure. Specific nonconformances, opportunities for improvement, and notable practices have been described in the “Key Findings” section.

### **Objective 1: Sustainable Agriculture Management**

#### **1.1 SUSTAINABLE AGRICULTURE STEWARDSHIP**

##### **Conformance Evidence**

- Sustainable Ag Stewardship Summary
- MIM Ag Stewardship Principles
- MIM AG Stewardship Policies
- 2025 VIP Scorecard
- Freshcare Certifications
- Hort360 Reef Certification
- Sustainable Wine Certification
- MIM Natural Capital Sustainability Report
- MIM Sustainability Annual Report
- Pages from Corporate HSEQ induction
- Leading harvest Managers training confirmation

##### **Auditor Notes**

- Manulife maintains publicly available policies on their website.
- Manulife’s Environmental Sustainability Policy has been updated to be a global policy from an Australian company level.
- The HR and safety policies remain applicable to Australian operations, due to legislation and regulation differences between geographies.
- Manulife’s Sustainability Report and GHG Verification Reports are publicly available on their website. Manulife’s Natural capital report at the time of the audit was not currently available on their website, however has been provided as evidence and outline the regenerative practices Manulife follow.
- Sustainability initiatives are considered by the board and during the budget process annually. Initiatives are outlined in Manulife's Sustainable Investment Policy.
- The Sustainable Investment Policy includes information on Manulife's approach to sustainable agricultural stewardship and its commitment to managing synergies and trade-offs between economic, social, and environmental dimensions of farmland management.
- Small scale projects are driven from a farm or regional level, while land developments are driven by long-term strategic plans.
- The risk register and farm operating plans are informed by the Operations Manager, Water Manager, Health, Safety, and Environment (HSE) Risk Manager, HR Manager and Region Managers.
- Farm managers are involved in the development of budgets and operating plans.

- Manulife establishes accountability through quarterly and monthly reports.
- The KPI incentive program rewards good performance, high hazard identification, low incidents, water use efficiency and financial performance per plan based on gross margin budgets.
- Manulife are now including more information on changes in climatic aspects, forecasts and bushfire risk for example, in board reports.
- There has been a change to how responsibilities are spread across the vertical management, it is not only the environment managers role, but rather an integration of people from across the business.
- There is a decarbonisation working group to manage the decarbonisation program.
- Trending factors have been identified and how the business aligns against them has been assessed.
- The reporting processes are now more transparent, particularly as the new mandatory reporting requirements will affect Manulife in the coming year or so.
- Sustainable Winegrowing Australia (SWA) and Hort360 Reef certifications have been achieved in Tasmania and Queensland.
- Manulife are involved with the LH and Hort360 (for almonds) metrics programs.
- Land is not converted out of agricultural production area unless it has been identified as having lower production benefit through due diligence. For example, land would provide greater benefit as biodiversity or supporting area or would cause degradation if continued to use it as production area (e.g. sand blow areas).
- Studies are being conducted for the natural capital and carbon potential for land.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						1.1.1
						1.1.2
						1.1.3

## Objective 1: Sustainable Agriculture Management

### 1.2 CRITICAL EXTERNAL FACTORS

#### Conformance Evidence

- Critical external factors summary
- Example safety alert 2025 seasonal fire outlook
- Org chart
- MAS(AU) HSEQ Risk Matrix

#### Auditor Notes

- Risk registers are created and reviewed annually and have been expanded beyond health and safety to include climate, sustainability, social, QA, operational and HR risks following the 2024 risk matrix updates and further enhancements in 2025. Risk registers have been gazetted to be part of the employee incentive program.

- Risk registers are being designed to support the development of heat maps using a traffic-light system for monthly reporting and annual reviews, enabling clear visibility of risk trends for the board (e.g., one farm flagged for increased storm-damage risk).
- The HSE strategy is reviewed annually to identify emerging needs, plan training schedules for the coming year and determine whether training budgets require adjustment.
- Seasonal outlooks, incident programs, emergency management plans and safety alerts are utilised to support proactive risk management.
- In response to predicted dry and hot conditions, measures such as early inspections and increased safety alerts on heat stress and bushfire risks have been implemented.
- Farming practices have been adapted to enhance safety and cleanliness, such as transitioning from spraying to seed treatment.
- The business uses global outlooks to inform reporting that supports farm managers in operational decision-making.
- Farm operating reports, due diligence reports, annual budgets and risk registers collectively contribute to efficient and effective farming operations.
- Farm managers prioritise proactive responses to critical external factors, drawing on a range of internal and external information sources. Industry affiliations are used to gather information and prepare for potential future challenges across the sector.
- The role of the HSEQ Manager has expanded to include responsibilities relating to local community, and stewardship contributions in addition to traditional HSEQ responsibilities.
- Project progress is being trialled in the program management software , VelocityEHS, through the management of change (MoC) process, enabling actions arising from Farm Operating Plans and due diligence to be traceable end-to-end. .

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
					1.2.1	

## **Objective 2: Soil Health and Conservation**

### **2.1 SOIL HEALTH**

#### **Conformance Evidence**

- Soil Health Summary
- MIM Ag Stewardship Soil Productivity Policy
- Regen Ag practices definitions for annual reporting
- Fertiliser Application Record - AgWorld example

#### **Auditor Notes**

- Vines
- The soil types consist of sandy soils, red ferrosols and quartz dermosol, and black cracking clay across the two properties.
- Approximately 200 core tests were completed during the due diligence process, with a further 100 soil pits completed during the vineyard development.
- Lime was applied across the property before ripping, an additional 1 tonne was applied in the rip line when planting along with superphosphate. Composted chicken manure was also applied in the rip lines for the sandy soils.
- Soil testing is completed annually and results are compared between marginal and high producing areas, and to past results.
- The fertiliser program is developed by the regional manager and reviewed by an external agronomist. The program is based on the soil test results and crop requirements for young vines and is created in Excel and updated through AgWorld from there.
- Petiole testing is completed as required through the season.
- Fertiliser applications are recorded through AgWorld, minimal changes are usually required throughout the season, however the timing may be adjusted.
- Soil moisture probes are located across the three different soil types at one of the sites and there are three across the other site. These are used to monitor temperature and leaching from the fertigation applications, to track nitrogen uptake and ensure application is to the root zone.
- The inter-rows of the vineyards is grassed and the prunings in the more established areas of the vineyard has been mulched in the inter-rows.
- Almonds
- The orchard was initially redeveloped in 2019 and the latest block planted a couple of years ago.
- The soils for the almond property are sandy loams and clays predominately. There is some limited rocky areas which have not been developed.
- Core samples were taken from across the blocks that were redeveloped and the soil analysis completed from here.
- Compost, lime and gypsum was added when the blocks were redeveloped.
- The old almond orchards were piled and burned.

# FINDINGS ORGANISED BY PERFORMANCE MEASURE

(Continued)

- There is an annual soil testing program. Test occurs at the same locations each year for the full suite of parameters.
- An external agronomist is involved in developing the nutrient management programs between Excel, AgWorld and independent agronomist reports.
- Fertiliser is applied via fertigation and foliar sprays, with applications recorded in AgWorld. Any in season changes are primarily due to seasonal conditions or crop stage.
- The soil moisture probes are used to track the fertigation application zone.
- Deep soil testing is not completed at this point as no leaching has been observed through the soil moisture probes.
- Prunings are mulched in the inter-rows.
- The farm manager is looking to maintain more weed cover in the inter-rows outside of harvest to minimise wind erosion.
- Macadamias
- The macadamia farm soils consist of grey sandy loams with some localised sections with clay.
- The trees across the majority of blocks are between 5 and 7 years old.
- Soil assessments, including electromagnetic (EM38) surveys, were completed during due diligence and further testing was completed during development works. Testing for the remaining block to be developed will include root zone testing.
- The annual soil monitoring program, completed by a local agronomist, is based off of the same blocks that were previously tested.
- The program is developed in AgWorld, including any revisions throughout the season if required, and applications are recorded against the budgeted program.
- There are 6 soil moisture probes across the existing 210ha productive area, with a further 9 planned for the 204ha new development. Each year the number of probes and their positioning is reassessed.
- A dendrometer installed on farm to inform plant growth, diameter and water status.
- The agronomist completes monthly visits and provides a report on nutrition as well as pest management, irrigation, etc.
- The sprinkler system is designed to deliver fertigation, though monthly applications.
- The farm team will be introducing more granular fertiliser applications as it gives more flexibility for labour, fertiliser prices and to improve tree health management ease.
- Application depth is monitored through the soil moisture probes.
- Prunings are mulched into the inter-rows and inter-rows are grassed.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						2.1.1
						2.1.2
						2.1.3
						2.1.4

**Objective 2: Soil Health and Conservation**  
**2.2 SOIL CONSERVATION**

**Conformance Evidence**

- Soil Conservation Summary
- MIM Ag Stewardship Soil Productivity Policy
- Regen Ag practices definitions for annual reporting

**Auditor Notes**

- Vines
- The EM38 surveys did not identify any significant soil management issues.
- Waterlogging has been mitigated through open surface drainage at one of the sites and sub-surface drainage at the other site.
- Runoff is captured into dams on the farms.
- The annual soil monitoring program will identify if any issues are emerging and trends will be monitored once sufficient data has been collected.
- Almonds
- There is a small area of drainage installed for waterlogging, but it is an isolated issue at that location on the property.
- The minor salinity issues identified during due diligence have been addressed through adjustments to the irrigation system design and more precise irrigation scheduling to reduce the associated risks
- Macadamias
- Profiling is completed to move organic matter from the inter-rows to the mounds.
- Drainage upgrades have been installed across the blocks which is directed either back on farm, or into vegetation for filtering. It will be an issue that will require management into the future.
- The farm team is looking to expand the root zone of the trees by moving from drip to sprinkler irrigation. This will assist with nutrient uptake and increase storm resilience.
- There were EM38 surveys completed at due diligence.
- The soil testing program will ensure no long term issues emerge. No trends have been identified to date.
- The application of compost will be considered in the future.
- During development contractors are used, who are currently completing land preparation works on the remaining block for development. They will be ripping, marking out blocks and mounding in preparation for planting. Gypsum and compost will be applied during this stage.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						2.2.1
						2.2.2

## **Objective 3: Water Resources**

### **3.1 WATER USE**

#### **Conformance Evidence**

- Water Use Summary
- MIM Ag Stewardship - Water Use & Quality Policy
- HSEQSTD-0.16 Water Management
- E4 Water Management Program 17.01.2025
- E4 Water Source Record
- ABF Pipers Irrigation Report Season 24-25
- Water Source Record - Macadamia - GRY-2025
- GRY - Water Usage Records
- CCS Hort360 Reef Certification
- Aus water month end Nov 24 Attis
- ABF Water register Oct-25
- ATF Water register Oct25
- GRY Water register Jul-25
- ABF Moisture probe

#### **Auditor Notes**

- Monthly meter reads are uploaded to VelocityEHS by the farm or irrigation managers.
- The water manager holds monthly meetings with the farm teams and water usage is tracked against the relevant licences.
- Every quarter there are more extensive reports completed outlining water use in more detail.
- Irrigation applications are recorded in the MAIT system and from there the fertigation applications are transferred to AgWorld.
- Soil moisture probes are in place across the property.
- The farm teams are responsible for reporting irrigation leaks as they are observed.
- Vines
- The water sourced for the vineyards are through department surface water allocations and a groundwater bore. The regional manager is coordinating additional allocations from the North Esk Irrigation Scheme
- Water takes are required to be recorded, however they are not required to be reported to the department outside of water audits, which have been completed in the past.
- The groundwater bore has a maximum flow rate of 0.5ML/day but there is no maximum licenced flow rate.
- The construction of the dams and groundwater bore at one of the sites has been in line with approvals and the department has been on site to inspect.
- The regional manager has had discussions with Tasmanian Irrigation around engagement and the development of new irrigation schemes.

# FINDINGS ORGANISED BY PERFORMANCE MEASURE

(Continued)

- There are soil moisture probes in place to monitor irrigation applications and the irrigation system has been designed and installed with water efficiency measures built in.
- Irrigation is all via drip irrigation. Satamap Vegetative Index (SVI) (an improved version of normalised difference vegetation index (NDVI)) imaging from AgWorld is used to identify irrigation system leaks.
- Almonds
- Irrigation water is sourced from the Murray River. It is pumped directly from the river, there are no storages on farm. Water takes are metered at the boost sites, which are pictured and reported back to the water manager monthly.
- The farms holds enough water licences to meet all tree requirements
- The Almond Board of Australia run field days promoting the efficient use of water on farm.
- SVI imaging, Ceres Imaging, and Wildeye irrigation programs are used to inform irrigation practices and water efficiency.
- The irrigation system is being upgraded on an ongoing basis as it is an aging system. The current dripline will be replaced with new dripline.
- Macadamias
- Irrigation water allocations are via a SunWater irrigation scheme and is metered at the farm entry point.
- The irrigation program is developed by the local agronomist and is based on the crop stage, weather forecasts and similar.
- The farm staff monitor the weather conditions and PhyTech soil moisture probes before scheduling the irrigation applications. Irrigation applications are focused in the afternoon and overnight to minimise evaporation.
- The irrigation system is controlled from the office and/or the farm pump stations depending on signal availability.
- SunWater ran a day locally on the changes to groundwater bore regulation in the region. Manulife’s Water Manager sends through relevant field days or activities which the farm team can attend.
- Additionally, the team works around SunWater requirements. For example, scheme shutdowns such as one scheduled for weed control.
- The irrigation system has been upgraded from drip irrigation to sprinkler irrigation as the drip irrigation system cannot supply sufficient water to maintain tree health and production.
- SVI is used to identify tree stress and irrigation leaks, however Ceres Imaging will be used to provide more up to date imaging for proactive management.
- Other
- A farm has exceeded it’s water allocation volume on a water licence. This was due to water tracking occurring on a whole farm basis rather than specific to the individual extraction point. FolMeasures have been implemented to prevent this from happening again.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
			3.1.1			3.1.2 3.1.3

## **Objective 3: Water Resources**

### **3.2 WATER QUALITY**

#### **Conformance Evidence**

- Water quality summary
- MIM Ag Stewardship Riparian Policy
- ABF Water analysis
- ATF - Water source record
- ATF water test invoice
- ATF - water test results
- GRY - water testing records
- CCS Hort360 Reef Certification

#### **Auditor Notes**

- Spraying is all completed internally by ChemCert accredited personnel or trained personnel overseen by ChemCert accredited personnel.
- Soft chemicals are used to support beneficials and beneficial numbers are observed during pest scouting.
- Soil moisture probes are used to monitor irrigation and fertigation movement in the profile.
- The spray applications are based on the program developed by the agronomists and farm teams.
- Vines
- The regional manager has been working with Wine Tasmania to coordinate a targeted ChemCert training course regionally for viticulture.
- Pheromone tags might be introduced, especially for the blocks that back onto the bush.
- The vines are set back from the native bushland areas.
- There is a weather station on one of the properties to inform spraying activities, a local weather station is used on the other site.
- Almonds
- Operators have to be aware of drift from neighbouring properties. Additional windbreaks will be planted to assist in separating the drift from the almond orchards.
- There is a lagoon adjacent to the property boundary which is partially fenced off due to the presence of a cultural site. It is buffered from the production area and the farm team minimise spray drift through monitoring weather conditions and following appropriate spraying practices. The probes monitor leaching.
- Macadamias
- The property has achieved Hort360 accreditation, which assessed the farm through site visits to assist growers to address agricultural runoff from farmland entering the Great Barrier Reef.
- Weather stations are located on two of the blocks which are used to inform spraying practices on all of the blocks. Wind speed, direction and the Delta T are considered when spraying.

**FINDINGS ORGANISED BY  
PERFORMANCE MEASURE**

*(Continued)*

- Water quality testing is completed as part of the quality assurance (QA) process.
- The riparian zones around Lake Gregory is buffered from the farm and the revegetation area identified on one of the blocks will also be buffered.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						3.2.1
						3.2.2

## **Objective 4: Crop Protection**

### **4.1 INTEGRATED PEST MANAGEMENT**

#### **Conformance Evidence**

- Integrated Pest Management (IPM) summary
- MIM Ag Stewardship Agricultural Chemical Use Policy
- MAS(AU) HSEQ-POL-005.3 Food Safety Quality Policy
- HSEQSTD-004 Hazardous Substances Ag Chemical Use
- ABF IPM Plan
- ATF IPM Plan
- GRY IPM Plan
- Pest and disease identification photos - wine grapes
- Bait station record
- GRY trap or baits invoice and schedule
- Product management QA procedure
- Nut investigation records
- Nut moisture records
- spray calibration records

#### **Auditor Notes**

- Pest scouting and beneficial monitoring is completed internally and externally. Farms are generally visited every two weeks.
- The properties operate under established Integrated Pest Management (IPM) programs.
- A spray program is developed before the season begins.
- The program is adjusted in season as necessary based on emerging issues and seasonal conditions.
- Pest control decisions are based on defined thresholds for each pest type. Soft chemicals are used where possible to minimise impact on beneficial species.
- Vines
- As the vineyard expands, a part-time staff member will likely be hired to handle scouting and control. Training will be provided to farm staff on the pests and diseases they need to monitor.
- No additional control measures are required beyond spraying.
- Almonds
- Pest and beneficial species are recorded during each monitoring round.
- Spray thresholds are followed for all pests except aphids, where control is presence/absence and targeted sprays are applied. Oil applications are used as the preferred control method to miticides, specific miticides are used once thresholds are reached and beneficials are not present in sufficient numbers required to prevent damage.
- Mowing is delayed in spring to support beneficial insect populations.
- Rats, mice and foxes are controlled using baiting programs.

(Continued)

- | RESULT | NONCONFORMANCE |       |       | OFI | NOTABLE PRACTICES | IN CONFORMANCE |  |  |       |
|--------|----------------|-------|-------|-----|-------------------|----------------|--|--|-------|
|        | PREVIOUS       | MAJOR | MINOR |     |                   |                |  |  |       |
|        |                |       |       |     |                   |                |  |  | 4.1.1 |
|        |                |       |       |     |                   |                |  |  | 4.1.2 |
|        |                |       |       |     | 4.1.3             |                |  |  |       |

## 4.2 CROP PROTECTANT MANAGEMENT

- Crop Protectant Management Summary
- MIM Ag Stewardship - Agricultural Chemical Use Policy
- Food Safety Quality Policy
- HSEQSTD-004 Hazardous Substances Ag Chemical Use
- AgWorld Spray Records
- Grapelink spray records
- Chemical training work instructions
- ChemCert certificate records
- HSEQFOR-008 Hazardous substance risk assessment glyphosate 450 herbicide
- Chemical spill emergency response flow chart
- HSEQFOR-018 Notification of spraying
- HSREG-002 Manifest

(Continued)

- Spraying is completed by ChemCert accredited employees.
- Chemical storage facilities are located on-farm and managed appropriately, which is verified by the annual safety audits. All Safety Data Sheets (SDSs) are stored digitally within AgWorld.
- Conditions are monitored prior to spraying and records are maintained through AgWorld.
- Vines
- Both properties are accredited under FreshCare and hold SWA accreditation.
- Almonds
- The farm operates two dedicated chemical storage facilities.
- Peroxide lock-ups are located adjacent to the pump stations.
- A hard-copy SDS folder is maintained in each chemical shed. A separate hanging folder is used to store SDSs for fertilisers.
- Chemical applications are recorded and managed through AgWorld.
- Macadamias
- The property has achieved Hort360 and FreshCare accreditations which assess input and chemical management practices.
- Buffer zones are maintained, with operations managed to minimise impacts on neighbouring properties.
- There are two chemical storages across the blocks. Chemicals from the other blocks are returned to the main storages. Each pump station can also be securely locked to temporarily store chemicals for other blocks when required.
- A new chemical storage compound is planned for the new block under development.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						4.2.1

## **Objective 5: Energy Use, Air Quality, and Climate Change**

### **5.1 AGRICULTURAL ENERGY USE AND CONSERVATION**

#### **Conformance Evidence**

- Agricultural Energy Use and Conservation Summary
- MIM Stewardship Energy Efficiency, Air Quality and Climate Change Policy
- MIM Agriculture SRI toolkit\_project
- 2024 Agricultural Operations Data

#### **Auditor Notes**

- Energy and diesel usage is monitored at the head-office level. This information is then collated and submitted into global reports.
- A global environmental working group has been established to standardise data recording and reporting.
- Fuel usage is tracked through SmartFill, with allocations recorded against individual staff and job codes. Dedicated fobs may be used for specific activities such as fungicide applications or harvest contractors.
- The collected data supports budgeting, operational reporting, and assessments of tractor and generator fuel efficiency.
- The farms have started using the machine service management AgWorld add on system, BOLT, for tracking maintenance and machinery aspects.
- A renewables register is in development to support broader sustainability reporting.
- The business is exploring standalone renewable energy systems, with Manulife having completed a site survey and results expected before the end of the year.
- Vines
- The electricity and fuel usage data is fed into the SWA reporting.
- Pumps are fitted with variable speed drives (VSDs) to improve energy efficiency.
- New infrastructure has been designed and installed with integrated energy-efficient features.
- Fendt tractors record their own operational data, including fuel performance. These tractors were purchased for their higher energy efficiency due to the three-cylinder engines, which was confirmed after commissioning through tracking of data.
- Solar is installed on one of the irrigation bores.
- Almonds
- Solar infrastructure is installed on the river-side pumps.
- An external mechanic services all machinery based on operating hours, with harvest equipment maintained annually.
- Macadamias
- Energy efficiency was a key consideration in recent purchasing decisions.
- Solar with battery support is in place on one of the blocks.

**FINDINGS ORGANISED BY  
PERFORMANCE MEASURE**

(Continued)

- The pump stations are on mains power as the load is too high for solar to support at this stage, however solar will be added to the new block for all power consumption.
- An area identified in the EM38 surveys as poorly draining has a solar pump in place.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						5.1.1 5.1.2

**Objective 5: Energy Use, Air Quality, and Climate Change**

**5.2 AIR QUALITY**

**Conformance Evidence**

- Air Quality summary
- MIM Stewardship Energy Efficiency, Air Quality and Climate Change Policy

**Auditor Notes**

- All staff must be signed off on machinery operation before they can operate independently.
- Standard operating procedures (SOPs) are in place, and all staff are fully trained in their application.
- Employees are instructed to operate all machinery efficiently to minimise unnecessary fuel use.
- Machinery servicing will be tracked through the BOLT system, which will integrate with SHED and AgWorld. Pre-start checks will be recorded in the BOLT system.
- Manual machinery information will be stored in BOLT, enabling informed decisions when selecting equipment based on key performance factors.
- The BOLT system will support the identification of the most efficient machinery for each task which can inform purchasing decisions.
- Vines
  - Fendt tractors are configured to run at the minimum required engine revolutions to optimise efficiency.
  - Dust generation is not an issue at this site.
- Almonds
  - VSD's are installed in the pumps to improve energy efficiency.
  - Programmable Logic Controllers (PLCs) are used in the pump systems to optimise performance.
  - Chemical applications are combined using transfer technology to reduce the number of passes required in the orchard.
  - Machinery is currently being upgraded, and all equipment is regularly serviced in the interim.
  - Dust is not a significant issue and traffic management plans direct vehicles to exit and return via separate routes, particularly during harvest. No more than two harvesting machines are operated at any one time.
- Macadamias
  - External mechanics are engaged to complete all machinery servicing.

# FINDINGS ORGANISED BY PERFORMANCE MEASURE

(Continued)

- VSD's are installed in the pumps to improve operational efficiency.
- LED lighting is used throughout all infrastructure.
- Dust is not an issue due to effective groundcover.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						5.2.1
						5.2.2

## Objective 5: Energy Use, Air Quality, and Climate Change

### 5.3 CLIMATE-SMART AGRICULTURE

#### Conformance Evidence

- Climate Smart Agriculture summary
- MIM Stewardship Energy Efficiency, Air Quality and Climate Change Policy
- MIM Agriculture SRI toolkit\_project
- MFS(AU) Safety Alert #24 bushfire preparation

#### Auditor Notes

- Regenerative agriculture practices are reported back to the US.
- A decarbonisation project is currently underway. A carbon-baselining project is underway. Fertiliser use and machinery operation data are incorporated into greenhouse gas assessments.
- The business is also participating in the LH metrics project with LH.
- Climate assessment tools are used to determine long term property viability for the relevant crops.
- Emergency evacuation plans are in place for all farms. The fire-fighting plan is reviewed annually.
- Vines
- Irrigation scheme water is being secured to supplement the existing river supply.
- Groundwater levels are monitored by the regional manager during pumping activities, who has not observed levels declining. Groundwater is pumped into an on-farm dam for storage.
- Planting decisions were based on market demand, winery requirements, soil characteristics, and climate suitability.
- Climate-futures data from the Department of Natural Resources and Environment Tasmania and Wine Tasmania was used to assess long-term vine viability during due diligence.
- The sites are not subject to flooding risk.
- Almonds
- Multiple emission sources, including tractors and other standalone projects, are evaluated for GHG emissions and possible emission reductions and findings will be implemented on farm.
- Efficient machinery use is a key strategy for reducing emissions, such as delaying slashing and combining chemical application passes.

# FINDINGS ORGANISED BY PERFORMANCE MEASURE

(Continued)

- Fertiliser use and related inputs are also fed back into assessment processes.
- Increasing weather variability, including drier conditions, is being closely monitored. Wind is the most significant climatic impact on operations. Irrigation timing and spray activities are carefully managed in response to conditions. Spraying is avoided during windy periods and maintaining the inter-row weeds helps reduce the effects of wind on the orchard.
- Macadamias
- Sprinkler irrigation has been adopted to support wider tree root zones and is expected to enhance storm resilience, as existing trees are currently top-heavy.
- Soil profiling is being undertaken to increase organic matter on mounds and enhance drainage. Drainage upgrades are being implemented across multiple blocks to address waterlogging. Drainage improvements and laser levelling are major priorities for the new block to support storm management. Drainage will be directed into silt traps before dispersal.
- The farm layout has been adapted to accommodate more autonomous vehicles, including wider headlands and smoother drains. The nursery stock previously planted was not ideally configured, but improvements are expected with newer trees.
- Four new varieties have recently been released, and one will be planted at the new block under development.
- Sunscreen will be applied to young nursery trees to protect them during establishment.
- Crop insurance is not considered viable for this operation.
- These sites are not considered high-risk locations based on the climate assessments.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						5.3.1
						5.3.2
						5.3.3

## Objective 6: Waste and Material Management

### 6.1 MANAGEMENT OF WASTE AND OTHER MATERIALS

#### Conformance Evidence

- Management of waste summary
- MIM Ag Stewardship - Hazardous Materials and Waste Management Policy
- MAS(AU)HSEQ-STD-009.2 Waste Management
- HSEQSTD-014 Asbestos Management
- HSEQSTD-004 Hazardous Substances Ag Chemical Use
- Cleanaway invoice
- DrumMuster receipts
- Waste Management invoices and agreements
- Waste service agreements
- Waste oil recycling invoice

# FINDINGS ORGANISED BY PERFORMANCE MEASURE

(Continued)

- DrumMuster storage area photos
- Recycling area photos

## Auditor Notes

- Manulife have completed an extensive resource recovery effort at one of their sites to enable recycling of inherited dripline polypipe which would have otherwise ended up in landfill
- Waste collection services are used for general waste.
- Scrap metal is separated and recycled.
- Chemical drums are stockpiled and taken to DrumMuster, larger drums are returned to the suppliers.
- Batteries are stockpiled before recycling.
- Vines
- Fertiliser is delivered in liquid form via tankers, reducing waste.
- Almonds
- There is an area on farm where recycling is segregated and stockpiled until it is recycled.
- Non-recyclable items are washed and reused on farm where possible.
- Macadamias
- Recycling is not currently done on site, however the farm team are investigating options.
- As the irrigation system is transitioned to a sprinkler system, the drip line will be recycled through Netafim.
- The farm team are investigating BagMuster collection in the region to manage the granular fertiliser bag waste, as it currently is directed to landfill.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
					6.1.2	6.1.1 6.1.3

## Objective 6: Waste and Material Management

### 6.2 FOOD AND AGRICULTURAL WASTE RESOURCE RECOVERY

#### Conformance Evidence

- Food & Ag waste summary
- FreshCare certs
- Food Safety Quality Policy
- Training Session summaries

#### Auditor Notes

- Vines
- Harvesting has only commenced on the property in the past few years.

# FINDINGS ORGANISED BY PERFORMANCE MEASURE

(Continued)

- All harvested grapes are transported off the property as it is harvested.
- Any remaining fruit is cleaned up by birds and any grapes which are pruned off are placed into the inter-rows.
- The regional manager oversees harvest operations to ensure no fruit is left on the vines.
- Pruning material is incorporated into the inter-rows.
- Almonds
- Stick waste was previously burnt, but the farm team is investigating mulching it in future or spreading it in unused areas.
- Almonds are stored on-farm for several months before processing. Stored product is monitored for pests and diseases. No waste is generated from stockpile areas, as the processor accepts all the material.
- Harvester performance is monitored throughout the orchard during the harvest period. As the farm does not have it's own mulcher, any remaining material is currently dragged out and burnt, although the farm intends to transition away from this practice.
- Macadamias
- There is currently minimal organic waste generated on the farm.
- A processing and dehusking facility is planned for one of the blocks. Macadamias from all of Manulife's farms in the region will utilise the facility.
- Waste volumes may increase once the processing plant and dehusking facility becomes operational. To manage this, on-farm composting options are being investigated for the husks.
- Nuts from harvest are not stored on the farm.
- Prunings are incorporated into the inter-rows.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						6.2.1
						6.2.2

# FINDINGS ORGANISED BY PERFORMANCE MEASURE

(Continued)

## Objective 7: Conservation of Biodiversity

### 7.1 SPECIES PROTECTION

#### Conformance Evidence

- Species protection summary
- MIM Ag Stewardship - Biodiversity Policy
- MIM Ag Stewardship - Riparian Site Management Policy
- Biodiversity Plans
- Threatened Species Posters
- Training Session Summary Biodiversity
- Involving growers in revegetation technical document
- *Releaf* winter 2023 article about trees for life and parrots Renmark
- Regent Parrot technical report summary

#### Auditor Notes

- Threatened species assessments were completed during due diligence and are incorporated into staff inductions. Annual toolbox sessions address biodiversity considerations.
- Vines
  - There were no specific biodiversity actions identified as required for the vineyards. Quoll habitats near the farms are avoided.
  - Traffic management plans are in place and outline speed limits, with a maximum of 40 km/hr on internal roads, to minimise any incidents between vehicles and wildlife.
- Almonds
  - Environmental assessments identified the presence of regent parrots and several other bird species.
  - Large numbers of birds congregate in the neighbouring lagoon area which serves as a swan breeding ground.
  - Shooting activities are carefully managed to avoid sensitive areas. As the property lies within a flight path, shooting is avoided when flocks are moving through.
  - Requirements are included in staff inductions.
  - Traffic management plans specify maximum speed limits for both harvest and non-harvest periods.
- Macadamias
  - The biodiversity assessments completed did not identify any species on farm, but there are some known to occur regionally, including threatened flora in the vegetation on the neighbouring block.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
					7.1.2	7.1.1

## **Objective 7: Conservation of Biodiversity**

### **7.2 WILDLIFE HABITAT CONSERVATION**

#### **Conformance Evidence**

- Wildlife Habitat Conservation Summary
- MIM Ag Stewardship Biodiversity Policy
- MIM Ag Stewardship Riparian Site Management Policy
- Biodiversity Plans
- Training Session Summary Biodiversity
- Involving growers in revegetation technical document
- *Releaf* Winter 2023 article about trees for life and parrots Renmark
- Regent Parrot technical report summary

#### **Auditor Notes**

- Remnant vegetation, offset areas and revegetation zones are identified and managed across the farms.
- Biodiversity offset plans guide the management of designated offset areas.
- Google Earth links are available and can now be provided to farms for reference. These resources currently apply only to farms that have undergone LH site audits. Some sites are required to maintain a specified plant-stand density. Compliance with these requirements is checked as part of routine inspections.
- Vines
- One area of vegetation on the property is formally protected.
- Staff avoid entering this protected zone, as the area is very wet and sensitive.
- Swampy sections near the river are also avoided to prevent disturbance.
- There are no ecologically significant sites located within the farmed areas.
- Existing bushland areas will be retained.
- Windbreaks and native plantings will be established along drainage lines.
- Almonds
- Two designated vegetation areas are present on the property. These areas are left undisturbed, with the exception of box-thorn control, which is carried out by digging plants out.
- There are some lagoons in the region which are listed, but they are not in proximity to the farm.
- Mowing is delayed in spring to support beneficial species.
- Macadamias
- A reef-related environmental project is underway on the farm.
- A revegetation area is scheduled for establishment late next year. All macadamia trees previously on the site have been cut and chipped. Herbicide applications for the planting area will be recorded in AgWorld.
- A local nursery has been engaged to supply local native species.

# FINDINGS ORGANISED BY PERFORMANCE MEASURE

(Continued)

- Fire breaks are maintained, and slashing is undertaken as required, weed control has not been necessary in most areas. Weed control will be carried out within the revegetation zones.
- The area was previously cleared by a former owner, Manulife intends to restore it, as the remaining vegetation is marginal.
- Lake Gregory serves as the town’s drinking-water storage and is not considered environmentally significant.
- Slashing is conducted away from bee activity and spraying does not occur while bees are present on farm.
- Inter-rows are maintained as grassed areas.
- Fire breaks are maintained on property boundaries.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						7.2.1
						7.2.2
						7.2.3

## Objective 7: Conservation of Biodiversity

### 7.3 AVOIDED CONVERSION

#### Conformance Evidence

- Avoided Conservation Summary
- MIMTA Deforestation Policy
- Biodiversity Plans

#### Auditor Notes

- Manulife’s deforestation policy is still current.
- During due diligence assessments, imagery is reviewed to determine if clearing has previously occurred.
- Vines
- There was no area converted from native vegetation during the development of the vineyard.
- There were a a limited number of paddock trees removed from the dam site, however these did not meet the definition of deforestation and were removed in line with legislative requirements.
- Almonds
- No clearing occurred during the redevelopment.
- Macadamias
- No area has been converted from native vegetation.
- There was a small area of native vegetation identified as being cleared by the previous owner which the farm team are revegetating.
- There has been a small area of native vegetation on one block which has been inspected for environmental values. It is unlikely to be cleared given Manulife’s deforestation policy.

## FINDINGS ORGANISED BY PERFORMANCE MEASURE

(Continued)

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						7.3.1
						7.3.2
						7.3.3

## Objective 7: Conservation of Biodiversity

### 7.4 CROP DIVERSITY

#### Conformance Evidence

- Crop Diversity Summary
- MIM Ag Stewardship Agricultural Biotechnology Policy
- Biodiversity Plans

#### Auditor Notes

- Vines
- There are three varieties of vines planted across the properties.
- The inter-rows are grassed predominantly with ryegrass and cocksfoot.
- Almonds
- There are five varieties planted across the property which have been selected for market suitability.
- Pollination practices are managed with consideration for bee health. Varroa mite is not present, and the use of a single beekeeper supports isolation. Windbreaks are being established to reduce exposure.
- Macadamias
- There are nine varieties of macadamias planted across the farm blocks.
- The inter-rows and non-production areas are grassed.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						7.4.1

**Objective 8: Protection of Special Sites**

**8.1 SITE PROTECTION**

**Conformance Evidence**

- Special Site Management Summary
- MIM Ag Stewardship Social Responsibility Policy
- Cultural Heritage Plans
- Training Session Summary Cultural Heritage
- Recognising Heritage Items or Sites
- CCS History - ex resident site visit 2025

**Auditor Notes**

- The due diligence process identifies cultural heritage sites through on-ground surveys and register searches. Any sites located are detailed in cultural heritage plans for each property. Findings are communicated through toolboxes on farm, if no sites are found, training includes what to do if a suspected site or artefact is found.
- Separate assessment and Dial Before You Dig are completed if any new developments are to occur on farm which identifies any listed sites on registers.
- Cultural heritage plans are collated for each farm where sites of significance are found which outline locations, significance and management actions.
- Management usually entails not disturbing sites, although weed control or maintenance may be done to protect sites. For example, clearing a fallen tree, or removing a weed growing within the site.
- The Google Earth link that is provided in the cultural heritage management plans, now includes a photo to assist employees with identification at sites.
- Staff are trained on the identification and management of cultural sites and information is also posted in break rooms.
- Vines
- There are no cultural heritage sites located at the vineyard.
- Almonds
- There are a number of sites on the property, which were all listed when the property was purchased.
- No new sites were found during redevelopment.
- All sites are marked, weed control will be completed if they are likely to disturb the sites, otherwise sites are avoided by employees.
- Macadamias
- There are no sites identified on the macadamia blocks, the development area was previously sugar cane.
- Staff are trained on procedures for sites of possible cultural significance.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						8.1.1
						8.1.2

**Objective 9: Local Communities**

**9.1 ECONOMIC WELL-BEING**

**Conformance Evidence**

- Economic well-being summary
- Approved local vendor listings
- Extract from Vendor Induction Pack - Code of Conduct

**Auditor Notes**

- The support roles such as HR, HSE, water and legal teams play a significant role in meeting business requirements.
- Business policies and procedures are in place to ensure all payments are made as required.
- The responsibility of making all payments lies with the finance/admin teams.
- Due to the nature of the business, there are numerous policies around money laundering, fraud and related topics that all employees must read and understand.
- Approved vendor lists for the farms are maintained to ensure contractors have all the appropriate insurances.
- Contractors that are used on an ongoing basis are integrated into VelocityEHS to enable training requirements and insurances to be tracked more closely. It is still the responsibility of the contractor to ensure that all staff have the required training. Contractor management is to be reviewed at the next strategy review meeting.
- New data management procedures will be implemented in the next twelve months.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						9.1.1

**Objective 9: Local Communities**

**9.2 COMMUNITY RELATIONS**

**Conformance Evidence**

- Community Relations Summary
- MIM Ag Stewardship Social Responsibility Policy
- Local Communities Policy
- Phone lists - neighbour contacts
- CCS history - ex-resident site visit 2025
- Stewardship contributions register - executed donations

**Auditor Notes**

- Manulife endeavour to source goods and services locally to each farm where it is possible.
- Manulife have a number of partnerships and organisations that they contribute to at a global level.

# FINDINGS ORGANISED BY PERFORMANCE MEASURE

(Continued)

- The local engagement in Australia has been formalised through the Good Neighbour & Stewardship Company Standard which combines the previous two policies, Good Neighbour and Stewardship Commitment. The new standard outlines Manulife’s commitment to contribute to three key pillars, environmental conservation and enhancement (40%), agriculture education and workforce development (40%) and community goodwill (20%).
- Manulife have allocated 82% of the budget in this year to date, the highest allocation to date.
- Manulife has developed a ‘Pay It Forward’ scheme where employees are provided with an additional day of volunteer leave to volunteer with an organisation of their choice. Vouchers are also distributed to all employees once a year to pass on to someone or something that would benefit from it.
- Manulife’s Pay It Forward scheme has been further developed to include online donations to a number of charities.
- The volunteer day is still in place, Manulife head office suggests local opportunities to each farm, however it is ultimately up to each farm to decide on their initiative and timeframe to support.
- Manulife have increased the internal communication around the good news stories within the business using SharePoint.
- Vines
- The farm team has installed a hydrant for the local fire service to provide access to the groundwater bore and donated fencing tools for a local high school to support their agriculture program.
- Financial donations have been made to the local Landcare to support the willow removal program.
- Stock from neighbouring properties are agisted on the properties to maintain non-production areas and assist neighbours.
- Almonds
- The farm has made donations to the local community hall for upgrades, financial support to enable surveys of the threatened regent parrot, supported the local high school with the installation of recirculation tanks for their hydroponic system.
- The farm team will arrange visits for school children during harvest.
- There is a small area of land the farm is not using as production area, which the farm manager would like to convert to regent parrot habitat as it falls under the flight path is currently dryland non-production area.
- Macadamias
- The farm is engaged with the reef Guardian Schools program, have provided support to the Bundaberg Jobs Commitment Initiative and the Mayors Christmas appeal.
- The reef Guardian Schools program is designed to take children out to the reef and teach them how to care for it.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
					9.2.1	

**Objective 9: Local Communities**  
9.3 Rights of Local Communities and Indigenous Peoples

**Conformance Evidence**

- Local Communities & Indigenous Summary
- MIM Ag Stewardship Social Responsibility Policy
- Phone lists - neighbour contacts

**Auditor Notes**

- There is a social responsibility policy in place at a global level.
- Stewardship contributions policy has been accepted and approved by the board. Manulife are working to execute it, administratively, it is harder contributing to lots of smaller businesses but they are working towards 100% by the end of the year.
- Due to a new managing director coming on board, there were some minor updates to the Good Neighbour Policy. The Good neighbour policy details the farm manager's decision-making tree, and is recorded in the document management system (VelocityEHS).
- Standards have been combined over the last twelve months to align with LH and make them easier to digest.
- The HSE department is looking to move back towards the Keep it Super Simple principle, with one pagers for work orders, particularly in regards to safety aspects and how they are communicated. It has been trialed at one property before being rolled out across more properties.
- Any existing land rights are identified in the due diligence process.
- Site signage on farm references the central office number and the contacts are passed on to farm manager as required. The site signage also includes induction and safety requirements for the sites.
- Complaints are logged through the VelocityEHS and the complaint response procedure requires a response to be made in writing.
- Elevated straight to the managing director if a public complaint is logged through VelocityEHS.
- Stewardship program has increased collaboration with local community and neighbours.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						9.3.1
						9.3.2
						9.3.3

## **Objective 9: Local Communities**

### **9.4 PUBLIC HEALTH**

#### **Conformance Evidence**

- Public health summary
- MIM Ag Stewardship Social Responsibility Policy
- Local Communities Policy
- Permit to burn
- Safety alert - permit to burn
- Notification of poison baiting
- Notification of controlled burn
- Notification of firearm scare gun use
- Notification of spraying
- Phone lists - neighbour contacts

#### **Auditor Notes**

- Farm signage has a central office number on it so there can be central department for contacts.
- Biosecurity signage on farm.
- Good neighbour policy outlines minimum communications and notification procedures with neighbours.
- All those coming on site must complete an induction, and an online induction is now available for farm specific inductions which outlines farm specific information, including farm entry points, office locations and the like.
- On-farm information board and pre-starts cover what is happening on farm that day.
- A library of online modules have been put together on different topics to provide content for the farm managers to deliver.
- Farm managers are able to choose from the library of topics based on what relevant on-farm activities should be covered. This has been developed over the last twelve months.
- Reviews of document management have been completed as medical records are now required to be kept on file, with NSW legislation requiring hearing tests for farm employees.
- A safety alert was sent out to farm staff to advise them of the change.
- Hearing tests are required within three months of commencing work in a noisy environment and every two years thereafter.
- Noise monitoring was completed on farm, which was additional to legislative requirements, and has lead to changes on farm including tractor door seals being updated.
- The changes have been incorporated into the fitness for work standard and risk registers, which are captured through the Management of Change (MoC) program.
- Incident reporting for snakes and other hazards are listed on the VelocityEHS system.

# FINDINGS ORGANISED BY PERFORMANCE MEASURE

(Continued)

- Manulife have been focusing on refining the current system rather than implementing new systems in the last twelve months.
- There have been updates to the timeframe and responsibilities matrixes and incorporation of global reporting for incidents of a certain level.
- AgWorld holds the recommendations, label and SDSs. From here SDSs are printed out and given to sprayers (if contractors), spray contractors will also do a toolbox at kick off and do a toolbox every morning before starting, this covers where they can and can't go amongst other things. System in equipment records, weather, GPS records etc. with weather stations located on farm.
- An Incentive program relates to hazard ID and having more hazards identified rather than incidents. Annual reviews of hazards and incidents is completed and informs HSE strategy. For example, high kangaroo numbers on roads can be managed through culling.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						9.4.1

## **Objective 10: Personnel and Farm Labor**

### **10.1 SAFE AND RESPECTFUL WORKING ENVIRONMENT**

#### **Conformance Evidence**

- Safe and Respectful Summary
- Human Resources Policy
- Safe Work Environment Policy
- Health Well-Being Policy
- Fitness for Work Policy
- Sexual Harassment Policy
- Discrimination Harassment and Workplace Violence Policy
- HSEQ Management
- Psychosocial Hazards Workplace Harassment Policy
- Incident levels and notifications
- Incident and Emergency
- Health and FFW
- Cardinal Safety Rules
- Emergency, Fire & Isolation Plans
- Mental Health First Aid

#### **Auditor Notes**

- Labour shortages can be difficult to manage in some regional areas and all prospective applicants are given a fair opportunity to present their suitability.
- At a global level, there is a DEI (Diversity, Equality, Inclusion) plan that looks at the business strategy to attract trained and experienced people.
- A policy is in draft form to sponsor employees for work visas where they will provide benefit to the business.
- A Sustainable Investment Policy is in place aiming for 40% female executives by a set date. Outcomes are outlined in the sustainable investing policy.
- A cross section of people across the business are involved in the interview and hiring process. Farm managers and regional managers handle hiring for casual roles. For permanent roles, hiring involves farm managers, regional managers and a representative from the head office (often the Managing Director).
- The HSE (Health, Safety, and Environment) manager and coordinator ensure training/HR aspects are completed. Farm managers inform training requirements depending on the role. This may evolve depending on practical skills.
- Farm administrators assist with updating people records. An induction checklist is used to cover necessary topics.
- Professional development is determined based on an employees position and their operational requirements.

# FINDINGS ORGANISED BY PERFORMANCE MEASURE

(Continued)

- Manulife are increasing the magnitude of training provided to supervisor level employees to lift the level of understanding and provide long term pipeline opportunities into farm and regional manager positions through their new future leaders program. Training may include further technical training and mentoring from senior leadership on hiring, job ads and the like.
- A percentage of the personnel salary usually goes towards professional development. The percentage is determined based on the position within the company.
- A tuition assistance program is also in place in addition to the professional development program. Opportunities are identified twice yearly and on an ad hoc basis as they come up.
- Manulife have updated the metrics for reporting on safety aspects as the incentive program previously used lost time injuries (LTI) and refocusing on more proactive safety metrics.
- The Code of Conduct must be read and understood by all employees and renewed each year.
- Equal opportunity policies are in place and discrimination and inclusion training is now required. All employees must comply with the discrimination and harassment policies.
- The safety system is a crucial part of building a respectful and safe working environment.
- Higher level employees have undertaken psycho-social personability testing to improve teamwork and leadership skills.
- Cardinal rules (local) are outlined on signage at farm offices, and all employees are expected to comply with them.
- Investigation timelines for incidents to get it to review stage have been added to incentive program as incidents were being left open.
- Manulife held a two-day strategy session for all farm managerial staff and relevant support and head office staff. An external facilitator was brought in. Some topics covered included people leadership and HSEQ strategy.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						10.1.1 10.1.2

## Objective 10: Personnel and Farm Labor

### 10.2 OCCUPATIONAL TRAINING

#### Conformance Evidence

- Occupational training summary
- HSEQ Management
- Cardinal Safety Rules
- Example training records
- VelocityEHS User Request
- Future Leaders Program

# FINDINGS ORGANISED BY PERFORMANCE MEASURE

(Continued)

## Auditor Notes

- Training requirements are available on VelocityEHS and are emailed to employees and managers for trainings that are required within 60 days.
- Notifications for training requirements pop up when logging on to VelocityEHS.
- Sustainability and safety trainings are covered in inductions and toolboxes, as well as in separate training sessions.
- Manulife have provided mandatory training for farm and regional managers on managing onboarding and prestarts for contracts.
- There are now more regular reviews of contractor insurances through VelocityEHS, through an insurance register. Smaller vendor insurances are managed through the finance team.
- Manulife are holding strategy sessions for the business on farm.
- Training matrixes have been updated at the supervisor and manager level to include psychosocial and similar risks.
- Supervisor level training has been increased across the business, where previously higher training was more focused on farm and regional managers.
- Training is tracked through VelocityEHS.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						10.2.1

## Objective 10: Personnel and Farm Labor

### 10.3 SUPPORTING CAPACITY FOR SUSTAINABILITY

#### Conformance Evidence

- Supporting capacity summary
- MIM Natural Capital Sustainability Report
- MIM Ag Stewardship Principles
- LH training managers and supervisors
- Leading Harvest training sessions
- Pages from Corporate HSEQ induction
- PD Regional Manager - QLD (Mar 2025)

#### Auditor Notes

- The Sustainability Policy references LH on a global level and further commitments and references to LH is outlined in the publicly released reports. In addition to their US certifications, Manulife are now certified in Canda and there are meetings held across the countries to share the findings.
- Leaders within Manulife undergo training on LH when they start.
- This training is included in position descriptions (PD's) for farm managers, ensuring they operate in a sustainable way.

# FINDINGS ORGANISED BY PERFORMANCE MEASURE

(Continued)

- Manulife have added requirements for the staff to complete monthly to quarterly inspections and submission of evidence quarterly on an ongoing basis to ensure evidence requirements of LH can easily be met
- The induction covers the business and therefore the employees commitment to sustainability.
- LH training, biodiversity and sustainability training are covered in training modules and/or toolboxes for staff.
- The HR Manager is encouraging more people to nominate for conference attendance.
- Manulife representatives have attended events to support LH and advocate for the standard at industry events.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
					10.3.1	10.3.2 10.3.3

## Objective 10: Personnel and Farm Labor

### 10.4 COMPENSATION

#### Conformance Evidence

- Compensation summary
- Casual employment information state
- Eligibility and Right to Work in Australia
- Fair Work Information Statement
- Horticulture Interpretation Sheet
- Fair Rate Audit - ATF

#### Auditor Notes

- Employee rates are based off industry awards and consider the experience and qualifications of staff.
- The HR department considers market contractor rates to ensure paying contractors appropriately.
- The HR system, Employment Hero, includes triggers for tracking employment measures.
- Direct hires are listed on Employment Hero, who have access to an app that clocks hours.
- Farm managers and admins coordinate time sheets for each farm, which are sent through to head office fortnightly for payroll processing.
- To assist farm managers with understanding legislative requirements, award interpretation sheets have been rolled out to the farms.
- Assessments on the cost of living for local areas and market competitive wages have been completed to assist with hiring and particularly, retaining, staff.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						10.4.1

**Objective 10: Personnel and Farm Labor**

**10.5 FARM LABOR**

**Conformance Evidence**

- Farm Labour Summary
- Fair Rate Audit - ATF
- Authority to Commence Work
- On-Farm Accommodation Standard

**Auditor Notes**

- Audit farm labour hire crews (pay slips and visas) and provide feedback for improvements.
- Internally, Manulife have minimum standards for farm labour crew organisations. They must be transparent and trustworthy contractors who complete their own auditing, are prompt with admin, pay appropriate rates on time and that training requirements of hires are met.
- Requirements placed on contractors are generally based on the length of contracts. For example, training requirements.
- Fair Work audits are completed quarterly pending the length of the contract.
- Visas are checked prior to mobilisation and quarterly after that, in addition to spot checks completed monthly.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						10.5.1

**Objective 11: Legal and Regulatory Compliance**

**11.1 LEGAL COMPLIANCE**

**Conformance Evidence**

- Legal Compliance Summary

**Auditor Notes**

- Health, safety and environment, government authority, local compliance reports and annual offset reports are mostly stored on VelocityEHS.
- Some higher-level documentation is 'private' and is only available to management or supervisors.
- Relevant information from these documents is disseminated into posters for display in farm offices.
- Management has implemented the Management of Change (MoC) module in VelocityEHS to track changes to policy.
- VelocityEHS system is now being used for announcements more than a paper system, which can be utilised by farm managers for toolboxes as well.
- VelocityEHS is able to provide reminders for actions required to meet compliance obligations. For example, the annual compliance report for offset management plan.
- The program and policies were reviewed again in 2025 due a new managing director starting with Manulife.
- Other areas of the business are now investigating options for using VelocityEHS to track more activities.
- All permits, approvals and licences are stored in VelocityEHS.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
				11.1.2		11.1.1 11.1.3

**Objective 11: Legal and Regulatory Compliance**

**11.2 LEGAL COMPLIANCE POLICIES**

**Conformance Evidence**

- Legal Compliance Policies Summary
- Compliance Policy
- Human Resources Policy
- Safety Policy
- Health Well-being Policy
- Fitness for Work Policy
- Sexual Harassment Policy
- Food Safety Quality Policy
- MIM Ag Stewardship Social Responsibility Policy
- Discrimination Harassment and Workplace Violence Policy

**FINDINGS ORGANISED BY  
PERFORMANCE MEASURE**

*(Continued)*

**Auditor Notes**

- A comprehensive compliance policy has been developed, signed and approved and now incorporates LH requirements.
- The legal team works across HSE matters and risk registers to guide actions, seeking external legal advice when required.
- Induction processes and internal systems are covered within the compliance policy.
- Training materials also reflect the requirements outlined in the compliance policy.
- Farm-specific information and compliance documents are being consolidated into the VelocityEHS system rather than being stored on individual laptops.
- The compliance framework is also referenced within the newly created HR policy to streamline governance.
- In the US, Manulife has introduced a lease addendum to address LH program requirements. This addendum is now being included in all lease renewals.
- The lessee commenced after the LH addendum was introduced, meaning compliance has been in place from the outset.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						11.2.1
						11.2.2
						11.2.3

## **Objective 12: Management Review and Continual Improvement**

### **12.1 FARM REVIEW AND CONTINUAL IMPROVEMENT**

#### **Conformance Evidence**

- Farm Review and Continual Improvement summary
- Workday reminder
- Pages form PMA - template

#### **Auditor Notes**

- Workday supports continuous staff development, with goals embedded in mid- and end-year reviews, positive feedback from employees, and rewards or support provided based on goal achievement.
- Employee recognition is delivered through the Podium program and a twice-yearly “Employee of the Quarter” award.
- Annual global engagement surveys inform regional socio-engagement trends, while IR compliance is maintained through quarterly work-rights checks and an annual payroll review.
- Early, proactive conversations and head-office support help maintain stable on-farm workforce relations.
- Monthly, quarterly and annual reporting, alongside the risk register, underpins business performance monitoring and accountability to clients and the board.
- Board meetings begin with a safety focus, supported by regular meeting circuits and monthly reviews of the VelocityEHS action list.
- Strategic decisions, including acquisitions, are informed by the long-term plan, farm operating plans and risk register.
- The 2025 performance cycle introduces scorecard changes, with the expanded risk register a key influence.
- The risk register now aligns with nearly all LH requirements and is used with budget and reporting cycles to manage business risk.
- Compliance is monitored through quarterly LH inspections, monthly–quarterly on-farm assessments and potential expansion of the LH metrics module.
- Audit schedules are approved annually, with results tracked through corrective actions and monthly board reports.
- Accreditation linked audits (e.g., HACCP–Freshcare, myBMP), annual safety audits and internal inspections form the core compliance framework, supplemented by HR Fair Pay audits and new certifications such as SWA and Hort360 (Reef certification).
- Manulife aims to integrate water management technologies into a single oversight dashboard.
- Strong engagement with industry bodies (e.g., Almond Board, Cotton RDC and local groups) ensures alignment with industry trends.
- Vines
- The tractors are set up with GPS which is a new technology for the vineyards.

- | RESULT | NONCONFORMANCE |       |       | OFI | NOTABLE PRACTICES | IN CONFORMANCE |  |  |        |
|--------|----------------|-------|-------|-----|-------------------|----------------|--|--|--------|
|        | PREVIOUS       | MAJOR | MINOR |     |                   |                |  |  |        |
|        |                |       |       |     |                   |                |  |  | 12.1.1 |
|        |                |       |       |     |                   |                |  |  | 12.1.2 |
|        |                |       |       |     |                   |                |  |  | 12.1.3 |
|        |                |       |       |     | 12.1.4            |                |  |  |        |

## 12.2 SUPPORT FOR SUSTAINABLE AGRICULTURE

- Support sustainable ag summary

- Manulife maintain strong relationships with industry groups, volunteering to host field days to support the industry and gain insight into emerging issues and technologies.
- Manulife were part of the Agriculture Victoria, Almond Board, trial for carpophilus beetle, which is to look into traps for the carpophilus beetle in particular, instead of trapping multiple beetle species unnecessarily. The data from the trap activity will be provided to Agriculture Victoria. Early signs are positive that the traps can be successful.

# FINDINGS ORGANISED BY PERFORMANCE MEASURE

(Continued)

- BeeHero has been trialled on a number of farms to inform nut drop activity in addition to bee movement information.
- Vines
- The farm is working with Nutrien to trial new chemicals and fertilisers.
- The farm will increase the number of trials in the future once the vines are properly established.
- Almonds
- There are limited trials on the farm due to the limited size of the property. Trials filter through from the other farms.
- Macadamias
- The farm works closely with the Australian Macadamia Society, however there are not dedicated trials at this stage.
- The macadamia development program will allow for the farm manager to visit other farms in the region.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						12.2.1

**Objective 13: Tenant-Operated Operations**

**13.1 LEASED-LAND MANAGEMENT**

**Conformance Evidence**

- Leased-Land Management Summary
- Lease Addendum (Sustainability)
- Property Inspection Form - Lease - Driscoll's

**Auditor Notes**

- The lease for the lessee has had a sustainability addendum included in the latest review, which references LH requirements. This has now been rolled over the US lease programs as well.
- The meetings, inductions and inspections will remain consistent with previous processes, however the inspections will now align more closely with the specific conditions of each lease.
- The template for inspections has been reviewed to make sure they are more aligned with Leading Harvest and the least atreements.
- The lessees have a written sustainability policy outlining their commitment to operate sustainability. It is available on the lessee's website.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						13.1.1

**Objective 13: Tenant-Operated Operations**

**13.2 LEASED-LAND MONITORING**

**Conformance Evidence**

- Leased-Land Monitoring Summary
- Lease Addendum (Sustainability)
- Property Inspection Form - Lease - Driscoll's

**Auditor Notes**

- The lessee at one of the sites sends their water requirements to the Manulife farm and irrigation managers who oversees the delivery of their water.
- Quarterly inspections are completed on site for environmental and sustainability monitoring purposes, where the regional manager meets with the site manager for the lease.
- There are annual inspections for the remaining lease conditions in line with the lease agreement.
- Feedback can be provided during monthly meetings with Manulife.
- VelocityEHS can be used to action items, including outcomes from the safety audits and lease agreements. The safety audits for lease agreements primarily relate to the safety of infrastructure.
- The sustainability addendum has now been finalised and is scheduled for inclusion at the review point for each lease farm.

**FINDINGS ORGANISED BY  
PERFORMANCE MEASURE**  
*(Continued)*

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						13.2.1

## CONCLUSION

Results of the audit show that Manulife has a management system that meets the requirements of and is in conformance with the Leading Harvest Farmland Management Program 2025. Manulife's enrolled acreage is recommended for continued certification after the provision, approval, and acceptance of corrective actions related to minor nonconformances.

## STANDARD USER GUIDANCE

### Leading Harvest Logo Usage

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## SPECIFIC FOCUS AREAS FOR NEXT AUDIT

Water management and compliance program updates will be considered key focus areas during Manulife's Recertification audit in 2026.