



Stahmann Webster

Brisbane, QLD

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

6 June 2025



TABLE OF CONTENTS

Executive Summary	2
Team Leader Recommendations	1
Audit Staff	1
Audit Scope	1
Introduction	1
Scope and Objective	1
Company Information	1
Audit Plan	2
Multi-Site Requirements	3
Audit Results.....	4
Key Findings	5
Review of Previous Audit Cycle	7
Findings Organised by Performance Measure	8
Conclusion.....	37
Standard User Guidance	37
Specific Focus Areas for Next Audit.....	37

EXECUTIVE SUMMARY

Stahmann Webster
Level 5, The Annex, 12 Creek Street
Brisbane, QLD 4001
07 4699 9400

Certification Date:

June 6, 2025

Recertification Due Date:

May 31, 2026

Certification ID Number:

AVERUM-LHFMS-2025-0033

Stahmann Webster 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 management staff, who utilised central management derived support programs. Business unit and technical managers are well qualified and experienced on sites. They take initiative when needed, and assume responsibility for addressing challenges and emerging issues. The business unit and technical manager's willingness to share information and results from established and trial practices was a greatly appreciated benefit to the audit team. The documentation was illustrative and provided by responsible staff. Interview subjects were transparent and expansive in their responses. All parties have been extremely generous with their time.

TEAM LEADER RECOMMENDATIONS

Audit Dates: 03/04/2025 – 06/06/2025	
Corrective Action Plan(s) Accepted: Yes	Date: 17/06/2025
Follow-Up Visit Needed?: No	Date:
Continue Certification: Yes	Date: 17/06/2025
All NCR Closed: Yes	Date: 17/06/2025

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 Stahmann Webster’s management system of production farmland on direct-operated properties to monitor conformance with Leading Harvest Farmland Management Standard Objectives 1–12, 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 May 2026

Audit Report Distribution: Sustainability Officer, General Manager Science and Sustainability, Project Officer

INTRODUCTION

This report summarises the results of the June 6, 2025 audit conducted on Stahmann Webster (SW) managed walnut 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 SW to perform a surveillance audit of sustainability performance on 0 - 4,000 hectares of managed walnut operations and determine conformance to the principles, objectives, performance measures, and indicators of the Leading Harvest Farmland Management Program 2025 (LH FMP 2025). SW transferred their certification to Averum, and will retain their initial certification expiration date. Information regarding Averum's certification transfer process may be found on our website. LH FMP 2025 objectives 1 through 12 were covered during site visits on properties in New South Wales. 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 FMP 2025.

COMPANY INFORMATION

Stahmann Webster is an independent agricultural investment firm. Farm management staff are responsible for the day-to-day farmland management services for Stahmann Webster's walnut properties. Stahmann Webster opted to certify 100 percent of their walnut properties in 2023, with separate certifications maintained for the different commodity types. SW intends to include multiple crop types in a single Leading Harvest enrolment during recertification in 2026.

During surveillance audits, two walnut properties in New South Wales were selected for site visits in 2025. The audits were conducted with the walnut technical manager overseeing the properties, with input from business unit managers on the properties. Managers overseeing decision making and standard compliance for sample sites were contacted for evidence requests and interviews. The properties in these regions are a representative sample of current practices in place and management decision making.

AUDIT PLAN

An audit plan was developed and is maintained on file by Averum. An online portal was established for Stahmann Webster coordinators to upload evidence and documentation securely for auditor review, and evidence was continuously uploaded throughout the audit. An opening meeting was held on April 3, 2025, preceding site visits. Following the meeting, a preliminary document review of the provided evidence was conducted by Averum. Field sites in New South Wales were examined on April 8, 2025. A closing meeting was held on June 6, 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

April 3, 2025

Attendees

SW:

Sustainability Officer, General Manager Science and Sustainability, People and Culture Manager, Group Finance Manager - Horticulture, Group Head of Finance, Pecan Business Unit Manager, Walnut and Almond Farming Business Manager, Technical Manager, Macadamia Farming Business Manager, Macadamia Farming Business Manager, WHS Compliance and Governance Manager, Project Officer, Research Officer Coordinator, Business Unit Manager Avocados and Mangoes, QA Officer - Fresh, QA Officer Processing Plant

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

June 6, 2025

Attendees

SW:

Sustainability Officer, General Manager Science and Sustainability , Project Officer

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

Stahmann Webster maintains operations on multiple properties in New South Wales. Stahmann Webster qualifies for multi-site sampling since the walnut properties within the management system are centrally controlled and directed by regional management, with regular monitoring activities. The sustainability officer is responsible for developing corrective action plans regarding LH FMP 2025 conformance and report them to Stahmann Webster management. Stahmann Webster'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 logistic feasibility.

AUDIT RESULTS

Overall, Stahmann Webster's walnut 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 auditors. Field visits were performed on two operating sites in New South Wales. Visits were conducted during harvest on the walnut properties, so harvest management was highlighted on site visits. Central management representatives, as well as farm managers, were present and interviewed to illustrate Stahmann Webster'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 on farm managers. Stahmann Webster's Sustainability Officer served as the guide and was available throughout the entire engagement, providing logistical support and honoring evidence requests wherever needed.

Region

New South Wales represents 100% of their enrolled walnut properties.

Crop

Walnuts

Properties Examined During Engagement

Two (2) sites visited during the audit

- Avondale Orchard
- Leeton Orchard

Management Population

- One (1) technical manager
- One (1) business unit manager
- Two (2) orchard managers

KEY FINDINGS

FINDINGS IDENTIFIED DURING THE AUDIT	
PREVIOUS NONCONFORMANCE	Zero (0)
MAJOR NONCONFORMANCE	Zero (0)
MINOR NONCONFORMANCE	Two (2)
OPPORTUNITIES FOR IMPROVEMENT	Eight (8)
NOTABLE PRACTICES	Zero (0)

PREVIOUS NONCONFORMANCE

Stahmann Webster achieved initial certification to Leading Harvest in June 2023, under ACO's certification processes. During initial certification and surveillance audits no minor non-conformances were identified. Opportunities for improvement were identified during initial certification and surveillance audits.

MAJOR NONCONFORMANCE

ZERO (0)

MINOR NONCONFORMANCE

7.3.2 DEFORESTATION

No deforestation policy currently exists, though it is noted that a policy previously existed but was never ratified. A new policy is scheduled to be developed within the next twelve months as part of environmental, social and governance (ESG) updates within Stahmann Webster..

9.3.1 LOCAL COMMUNITY AND INDIGENOUS PEOPLES POLICY

Policy requires updating or the development of a new policy to cover community acknowledgment, which will be undertaken as part of the ESG updates.

OPPORTUNITIES FOR IMPROVEMENT

5.3.3 PREPAREDNESS FOR SEVERE CLIMATE AND WEATHER EVENTS

Emergency response/evacuation plans were not available, although they were referenced by staff during discussions.

6.1.2 RESOURCE RECOVERY

Recycling is separated at some sites but not all farms, despite operating in the same region. Potential to investigate opportunities for consistent recycling across properties.

6.1.3 MANAGEMENT OF AGRICULTURAL CHEMICALS AND OTHER MATERIALS

Ensure spill kits are easily identifiable and accessible in the case of accident. On one site, the workshop spill kit was difficult to locate and not signed as a spill kit.

6.2.2 RESOURCE RECOVERY OF AGRICULTURAL SURPLUS AND WASTE

Ensure spill kits are easily identifiable and accessible in the case of accident. On one site, the workshop spill kit was difficult to locate and not signed as a spill kit.

7.1.2 SPECIES AT RISK PROTECTION &

7.2.1 NATIVE HABITATS AND NATURAL COMMUNITIES

Possible species on farm have been identified through desktop assessments, however the opportunity exists to formalise this information into management materials for farm staff. Noting that there is a project underway to further assess biodiversity values on farms and identify opportunities for further habitat development. Actions will be monitored during recertification audits in 2026.

7.2.2 ECOLOGICALLY IMPORTANT SITES

Ecologically important sites on farms have been identified through desktop assessments, however the opportunity exists to formalise this information into management materials for farm staff. Noting that there is a project underway to further assess special values on farms and identify opportunities for further habitat development. Actions will be monitored during recertification audits in 2026..

7.3.3 RESPONSIBLE LAND ACQUISITION

Previous clearing is considered during the due diligence process of property acquisition, however the opportunity exists for this to be further formalised during the development of the deforestation policy.

NOTABLE PRACTICES

ZERO (0)

KEY FINDINGS

(Continued)

Stahmann Webster

LH FMP 2025 AUDIT SUMMARY REPORT

REVIEW OF PREVIOUS AUDIT CYCLE

Stahmann Webster was initially certified to the Leading Harvest Australia Farmland Management Standard 2023 in 2023 by ACO Certification Ltd, with the first-year surveillance audit held in 2024. The surveillance audit in 2024 identified five opportunities for improvement where further information may be required in the future.

In 2025, Stahmann Webster’s surveillance audit was conducted by Averum under Leading Harvest’s updated standard the Leading Harvest Farmland Management Program 2025. Stahmann Webster will retain their initial certification expiration date, with recertification due in 2026.

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

Leading Harvest Australia Farmland Management Standard Reports
Environmental Due Diligence Report

Auditor Notes

- SW have a written sustainability statement created for initial certification stage.
- The goals are depicted in alignment with the United Nations Sustainable Development Goals (UN SDGs).
- Stahmann Webster’s ESG committee will be reviewing and revising policies and subsequently the ESG statement to align with the updated policies.
- The new statement will be developed before the recertification next year.
- The sustainability team meets with business unit managers monthly to discuss opportunities and plans.
- Given challenging recent seasons, implementation of some sustainability projects has been delayed however the business will be moving forward with some of these projects in the coming year.
- The Capital Expenditure (CAPEX) project toolkit is used to assess projects including a project for renewables planned for the Leeton Orchard. A feasibility assessment is currently underway and will be completed by July. This will include full costings and a project plan for the building of a solar grid. The CAPEX project toolkit (discounted cash rate toolkit) will be used to inform the decision-making process for the development.
- SW has drafted a Climate Transition Plan (CTP), which includes their commitment to contribute to the improvement of food systems. SW are working towards formalising targets for the business which will be outlined in the finalised CTP..
- SW does not have a written policy regarding farmland conversion, however it is not a part of the long-term purpose of the business to convert area out of production.
- When new farmland is developed or converted into to a different crop type, the area is assessed for soil quality and development potential, including native vegetation assessments.
- Drainage issues have caused the walnut trees in one area at the Leeton orchard to die, these trees have or will be pulled out and this area used for the solar development or planted back to vegetation and fenced off

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

List of Climate Impacts

Redacted ESG Committee Meeting Minutes

CAPEX Toolkit Template

Risk Appetite Statement

Auditor Notes

- SW has a risk management matrix process and drafted climate transition strategy which considers climate risk in more detail.
- A physical climate risk report has been commissioned to outline risks such as flood, fire and storms and their potential impact on the business.
- The SW board considers the risk matrix and uses the risk factors to inform decision making.
- Actions are identified for on farm staff, for example, to assist with increasing water management efficiency, business unit managers were sent to attend courses on drought management and fertigation.
- When labour was particularly hard to find after covid, farm labour crews and recruitment agencies were used to assist in providing and recruiting staff.
- Where labour shortages meant further outsourcing of skilled workers (e.g. mechanics), this is factored into the budget.
- SW provided due diligence reports, water risk assessments, and a list of climate impacts for tree nut properties. Reports identify risks and provided recommended actions and associated costs to support long-term sustainability and profitability.
- SW provided a redacted report from their ESG committee meeting. Topics include several relevant factors, including material priority actions, shareholder ESG recommendations, and policy updates.
- SW provided a template used to evaluate CAPEX proposals. The template is intended to determine the feasibility, objectives, scope, and benefits of a project.
- SW has a Risk Appetite Statement with a Risk Matrix that clarifies how SW determines material risks that require mitigation, proactive management, active management, or no action.

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

Fert budgets
Fertiliser application records
Fertiliser invoices
FY25 Scouting records
Soil and leaf test results 2025 crop
Soil maps
Staff credentials and licences

Auditor Notes

- Soils on the audited walnut farms are predominately clay loams and clay to sandy loams.
- Electromagnetic 38 (EM38) soil mapping and LIDAR surveys were completed in 2019/2020.
- Subsurface drainage was installed based on the findings of the surveys, the wetter areas will be managed with a combination of drainage and irrigation practices.
- Soil testing is usually completed annually each winter.
- This year, some additional strategic surveys have been completed based on the previous EM38 survey, however the farms will still test a couple of sites over winter that are usually done to maintain the continuity of data.
- The strategic sampling will be incorporated into the soil testing schedule going forward, with deep core testing for the full suite of parameters to be tested at some sites each year.
- Applications of soil ameliorates will be based on soil types. Gypsum has been applied, with a blanket application of 2 tonnes/ha applied last year, going forward this will be more targeted.
- Yields vary based on soil type, and hence the fertiliser program is developed in house based on past yields and applications, soil types and yield potential.
- The program is tracked in excel and applications are recorded in farm software system.
- The farm's agronomist will visit the farms to complete inspections and provide inspection reports throughout the season.
- Fertigation is applied once to twice a year, depending on bud/crop stage.
- One of the farms maintains weeds on the headland to protect the soils from erosion, although it is not necessarily easy to maintain on all farms.
- The inter-row weeds and previous cover crops are allowed to grow and spraying is delayed until late spring in preparation for harvest.
- The previous cover crop of clover and rye grass reshoots each year after harvest.

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
Compost application record

Auditor Notes

- On one of the farms, bales are placed on the headlands to slow water down across the property.
- Soil sometimes has be returned to the headlands after major rain events.
- SW attempt to maintain groundcover on all of the headlands, however on some farms this is difficult due to low rainfall and soil type.
- Within the orchard bounds, a channel/spoon drain with rocks has been built to slow water down and direct it through without damage.
- Subsurface drainage has also been installed at the properties with waterlogging issues.
- Gypsum has been applied universally as a base application, with applications to be variable going forward.
- Compost and/or manure are applied each year.
- Soil moisture probes are scattered throughout in the orchard for reading soil moisture levels down to 1m and ensuring irrigation is not leaching past the root zone.
- Two types of probes have been trialed, which measured EC in addition to soil moisture.
- The original soil moisture probes will be kept, as they are primarily used to verify the in field spade soil moisture checks.

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

Irrigation masterclass attendance records

Water licences

Meter readings

Irrigation diaries

Block areas and flow rates

Soil moisture graphs for irrigation

Auditor Notes

- Water is sourced through the Murrumbidgee irrigation scheme (MI), with water ordered at least 24 hours in advance.
- Work with a water broker, with whom business unit managers sit down with twice a season and determine water budgets based on worst case scenarios.
- Budgets are revised throughout the season. Extra water is released back onto the market throughout the season if it is not required on farm.
- Water meter checks are completed once a week and reconciled with the water broker monthly. The business unit managers are responsible for tracking the usage against the allocation.
- Meters are telemetered at the water pickup point for MI, with internal meters within the farm for internal reporting and tracking purposes.
- Water use is tracked daily on each farm and water use is reported back to the board monthly.
- SW's business unit and technical managers are part of the irrigator groups for MI and other organisations.
- Additionally, the technical manager is on the newsletter list and attends workshops with the Irrigation Research Group. Field days cover multiple commodities, the week prior to site visits, the technical manager attended a field day at a pistachio orchard, which is useful for new ideas and practices.
- The Department of Primary Industries also holds courses in the area which managers have attended in the past.
- Soil moisture probes and spade tests are used to monitor soil moisture.
- Water use is tracked against the water budget on an ongoing basis.
- Blocks are recorded separately, as water is differentiated between blocks based on landscape features and soil types.
- Sufficient allocations are held for the whole orchards, with additional water sold during the season if not required.
- The water has a high sediment load, so there are a number of filters prior distribution through the irrigation season. Blockages are cleaned out regularly.
- SW submitted a grant application to a university last year for meters that test the water pressure in the trees. It wasn't successful in this instance, however SW will continue to apply for grant support in the future.

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

Chemical training certificates
Scouting records
Farm software platform application records

Auditor Notes

- Scouting is completed internally and SW’s technical manager provides recommendations for control.
- Third-party pest scouting consultants are engaged to come out and provide overview reports on occasion.
- Soil moisture probes are installed up to a depth of 1m to monitor water movement down the profile.
- Spraying is completed internally by employees with chemical training certificates, except for aerial spraying, which is completed annually to assist with nut opening. Neighbours are notified when aerial spraying is to be completed, although there are no houses or other sensitive receptors (i.e. waterways or vegetation) in close proximity.
- Fertiliser applications are generally via fertigation and soil moisture probes are installed to monitor water movement through the profile.
- Regular soil testing is completed down to 30cm and down to 60cm at some sites.
- Tissue testing is completed twice a year with January testing particularly important, prior to harvesting.
- The fertiliser program is amended based on the tissue testing results.
- Water quality testing occurs at two of the farms.
- The main channel for the Murrumbidgee Irrigation Scheme is approximately 100-150m from the production area. Aerial spraying is only completed when the wind is blowing the other direction, with spraying conditions informed by on farm weather stations.

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

Staff chem certificates

Work, Health Safety Management (WHSM) policies

Farm software platform chemical application records

Fungicide program 24-25

Auditor Notes

- Pest scouting is predominately completed internally, with third-party consultants engaged on an ad hoc basis.
- Traps are used for monitoring throughout the orchard.
- Normalized Difference Vegetation Index (NDVI) is used as a tool for monitoring tree health.
- Scouting records are tracked in Excel, although looking to transition this to the farm software system.
- The Integrated Pest Management (IPM) program is made up of multiple forms of control. The program is factored into the budgeting process but is not formalised past this point.
- Beneficials have been introduced at the orchards, and are monitored during pest scouting.
- Mites were found at one orchard, but since the introduction of beneficials to target the mites, no further damage has been observed.
- Further beneficials have also been introduced to target certain pests with three applications each season. They are introduced via drone, however monitoring is difficult so yellow cards will be placed around the orchard for further monitoring.
- The walnut technical manager is considering the use of automated traps, which have a camera on top and measures moths daily and enables the managers to direct staff to look at the areas of the orchard with more activity and enable spray applications to be targeted in line with egg hatchings and other factors.
- Other forms of control are used where required, and based off the specific orchard area and pest.
- Spraying is only completed for specific blocks when certain pests reach the necessary threshold for spraying.
- When it is required, soft chemicals are used.
- Spraying of the inter-rows is only completed if there is a high weed load, otherwise it is left to die off naturally, as the harvesters can deal with some debris.
- Chemical applications are recorded in farm software system.
- Non-productive grassed areas are slashed when required, and around where some native plantings have been completed. Drip tube has been installed around the trees while they establish.
- Biosecurity signage is located at the entrance to each farm, and there are washdown bays on each farm. Machinery is inspected when it comes on farm, managers are looking to improve records of washdowns and inspections.

FINDINGS ORGANISED BY
PERFORMANCE MEASURE

(Continued)

- Consultants are required to come clean, or it is preferred that they use farm vehicles.
- The biosecurity program is to be formalised across the business, for the different commodity types.
- There are bait stations located at the infrastructure points on farm.

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

Objective 4: Crop Protection

4.2 CROP PROTECTANT MANAGEMENT

Conformance Evidence

Spray diary

Screenshot of Safety Data Sheets (SDSs) from Work, Health and Safety system

SOP Airblaster

Auditor Notes

- Spraying is predominately completed internally, aside for aerial spraying.
- Employees all hold chemical training certificates.
- There are Standard Operating Procedures (SOPs) for chemical handling, mixing and applying (machine specific) that all employees must read and be signed off on.
- Weather stations are located on farms to inform irrigation activities and spraying is recorded on the spray logs and farm software system. The input data management system management program is beginning to be implemented across the farms.
- The chemical mixing point is at the main shed, with safety showers and spill kits located close by.
- The chemical storage on farms are all signed and have the appropriate safety requirements.
- Empty chemical containers are taken to DrumMuster and Intermediate Bulk Containers (IBCs) are returned to suppliers.

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

Electricity invoices
Climate Transition Plan (DRAFT)

Auditor Notes

- SW track electricity and diesel usage. There are fobs on vehicle and machinery keys to access the diesel and log it against each machine. Irrigation, machinery and offices are logged separately.
- Some resource usage is tracked by the finance team, while the sustainability team monitors it for greenhouse gas (GHG) assessments.
- Providing feedback to farm staff forms part of the drafted climate transition plan, which will include mechanisms to improve efficiency. The drafted climate transition plan will require updating to incorporate newly acquired farms.
- GPSs are installed in the on-farm machinery to monitor efficiency through vehicle movements.
- There is an in-house mechanic for machine service and maintenance.
- Variable Speed Drives (VSD's) are in the majority of pumps on the farms, the others have soft start.
- The GHG assessments are indicating that 40-50% of the business emissions come from electricity. For this reason, solar is being investigated as an option to reduce electricity requirements.
- On the farm with the processing facility, feasibility assessments are underway for the installation of solar, as it is one of the sites that uses the most electricity.

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

Dust suppression invoice
FY2023 GHG Inventory Scope 1 and 2

Auditor Notes

- There is GPS technology is in all of the machinery.
- Traffic management plans are not currently in place for the walnut orchards.
- There are SOPs that new employees must be signed off on prior to independent use.
- Water trucks are used during harvest and high traffic times to suppress dust.

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

Spill response procedure
LH training slides
Refreshment training attendance
Freshcare training attendance 2024
Semios spray forecast
Semios traps
Soil moisture probe graph
Climate transition plan (DRAFT)

Auditor Notes

- GHG assessments have been completed since 2019, following guidance provided in the GHG protocol. SW used to work with a GHG assessment company to assess the carbon sinks, but it was not able to capture all of the data from a corporate level, so they are considering other methods and programs.
- SW has a drafted a Climate Transition Plan (CTP), which includes their commitment to contribute to the improvement of food systems. SW are working towards formalising targets for the business which will be outlined in the finalised CTP.
- Low emission fertilisers have been considered by the business, but they are not yet fully developed and there are other issues raised by them at this stage. The low emission technology also cannot yet be captured in GHG assessments.

FINDINGS ORGANISED BY
PERFORMANCE MEASURE

(Continued)

- Instead, SW are looking to apply biochar in addition to the current manure and compost program to reduce emissions and increase soil carbon. It is currently accessed through SW’s biochar facility from the pecan processing at Toowoomba. It is not currently utilised on walnut properties. SW are looking to construct a biochar facility at the walnut processing plant to reuse resources here.
- As part of the ongoing investigations into the use of biochar, SW are looking to engage with a PhD student to review the properties of biochar applications, for example, mixing ratios with compost and other ameliorates.
- Heat capture from the biochar facility is being considered for utilisation as an energy source.
- A relatively large area of the orchard flooded in 2022/23, which killed some trees and requires them to be removed.
- SW have engaged a soil scientist to determine the best use for this area going forward. This may include, the installation of drainage and redevelopment to orchard, utilisation of area for solar installation and/or biodiversity projects.
- Cost insurance was not held and is not held for the orchard as it is cost prohibitive.
- Instead, drainage upgrades are planned to lower the risk of water sitting on the property after flood events, as this is what has caused the most damage previously. Soil pits will be provided to inspect soil profiles and see where the pan is located to inform whether surface drainage is sufficient or whether subsurface drainage will be required.
- Emergency management plans were not available.
- The muster points are in the yard.
- Frost can be a risk to the walnut orchards and there were frost events over the last season, however it is not yet justifiable to install frost fans as this is the first year of frost in over 5 years.

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

Objective 6: Waste and Material Management
6.1 MANAGEMENT OF WASTE AND OTHER MATERIALS

Conformance Evidence
Freshcare Waste Management Program
SOP examples
Waste management invoices
DrumMuster invoices

- Auditor Notes**
- General waste stored in skips and collected from farms.
 - Waste is not separated at one of the sites, however it is completed at some sites. For example, cardboard recycling is not universally implemented across farms.
 - Batteries are recycled through local recycling programs.
 - Intermediate Bulk Containers (IBCs) are returned to suppliers for reuse.
 - Waste chemicals taken to ChemClear, and empty chemical containers are taken to DrumMuster.
 - Waste oil is stored in an IBC until the waste collection company comes to collect it.

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

Objective 6: Waste and Material Management
6.2 FOOD AND AGRICULTURAL WASTE RESOURCE RECOVERY

Conformance Evidence
Compost test results
Spray rig calibration records

- Auditor Notes**
- During harvesting, nuts that are too small are left in-situ, and if there is a high volume of leftover nut in the orchard due to pest damage or other issues, the inter-rows may be mulched .
 - Operators regularly check how many nuts are being left behind from harvesters, settings are adjusted if needed.
 - At the Leeton property, walnuts are processed directly after harvesting, while at the other orchards, the walnuts are stored in shipping containers prior to delivery to the processing facility.
 - Dusking primarily occurs prior to delivery to the processing facility, husks are composted with cow manure and spread back on farm.
 - Composting does not require an EPA permit as it is below the reporting thresholds.

**FINDINGS ORGANISED BY
PERFORMANCE MEASURE**

(Continued)

- Shells are currently composted or spread back into the orchard. A biochar facility is being built in conjunction with the processing facility this year to allow for the shells to be processed on site.
- Wastewater from the processing facility is currently irrigated onto a pastured area near the facility.

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

Objective 7: Conservation of Biodiversity

7.1 SPECIES PROTECTION

Conformance Evidence

Nature accounting program - fauna and vegetation (email)
Stahmann Webster maps (email)

Auditor Notes

- Desktop biodiversity assessments have been completed for the properties.
- This information is not currently incorporated into training materials for staff.
- SW are currently engaging with a natural resource management organisation to undertake some further assessments, and utilise their Woodland bird assessment method, although it is yet to receive final approval.
- SW have also started discussions with a company to complete remote sensing biodiversity assessments to verify previous assessments.
- The nature accounting program assessments will be prioritised, and after the baseline assessments will be completed annually.
- Based on the nature accounting program assessments, actions will be identified to improve the score over time.

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

Bio assessments
Training records
Nature accounting program – fauna and vegetation
Stahmann Webster maps

Auditor Notes

- There is some existing remnant vegetation on farms.
- Some further native plantings have been completed, with bee friendly plantings in mind.
- The main canal for the MIS runs near the perimeter of one of the properties.
- Further nature assessments will primarily include bird assessments, as other wildlife is limited on these properties.
- Training sessions will be expanded to include further biodiversity aspects once this information is known.
- Beneficial insects are supported and introduced on farms.

**FINDINGS ORGANISED BY
PERFORMANCE MEASURE**

(Continued)

- Slashing of non-productive areas is delayed allowing for it to support flowers and hence provide habitat for beneficials.

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

Management interview

Auditor Notes

- The walnut farms have historically been farmland, and no clearing has been undertaken on the property to enable development to horticulture.
- Stahmann Webster plan to expand the Corporate Social Responsibility (CSR) policy or create a general overarching ESG policy to include SW's deforestation policy. An avoided conversion policy is not currently enacted for this reason. Once the policies are updated the content will be communicated to all staff.
- SW avoid acquiring properties that are recent conversions, instead investing in properties where they have previously been agricultural land (e.g. cotton or sugar cane) and this is converted to horticulture.
- There was one area found in a due diligence assessment on one of the farms visited during audits, that was found to have been cleared previously but was regenerating. The area has been fenced off, weed control was undertaken and quality on site has improved.

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

Objective 7: Conservation of Biodiversity

7.4 CROP DIVERSITY

Conformance Evidence

Management interview

Auditor Notes

- Nine varieties of walnuts are grown for nut production on the farms visited during the audits, in addition to pollinator species which are grown to support pollination on farm.
- Cover crops are allowed to regrow over winter, to provide habitat for other pollinators.
- The business unit managers, allow for the non-productive areas to grow and provide habitat, with slashing avoided or delayed depending on the season.

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

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

Due diligence maps

Auditor Notes

- Farms were assessed using publicly available information to meet LH requirements at the beginning of the certification process.
- No sites of cultural significance were found on any of the properties during the assessments.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						8.1.1 8.1.2 (N/A)

Objective 9: Local Communities

9.1 ECONOMIC WELL-BEING

Conformance Evidence

Management review

Auditor Notes

- Payments are centralised at the head office for all the properties.
- Management accountants oversee compliance-based payments, for example, water or rates.
- Resources and service providers are sourced locally. SW try to spread purchases between multiple service and product providers in the community., For example, multiple chemical and fertiliser supply companies are utilised in the local community.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						9.1.1

Objective 9: Local Communities

9.2 COMMUNITY RELATIONS

Conformance Evidence

Sponsorship Invoices

Auditor Notes

- A donations and sponsorship register spreadsheet is maintained and payments are recorded in SW financial system.
- Some groups request sponsorship from SW and while there is not a policy outlining a process for assessing sponsorship opportunities, the business focuses on groups where SW employees are involved, and organisations/sporting groups that are in the towns local to the farms.
- SW also donate to national foundations, the Country Fire Service (CFS), and organisations to support indigenous school children.
- SW support a couple of PhD programs internally and looks to support scholarships for a couple of external PhD through universities with relevant specialties.
- The process for providing sponsorships will be updated this year, with the communications officer previously responsible for the sponsorship process, and this will be moving to the ESG team.
- Organisations supported in proximity to the walnut farms include CanAssist, Griffith Festival, tennis club, Leeton Golf Club and Leetong Basketball Association.

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

Due diligence maps
Sustainability Reports

Auditor Notes

- There is no existing policy, however the need for one will be reviewed in the ESG policy updates in the next twelve months.
- The existing Social Compliance Policy does include reference to First Nations peoples, and their rights.
- The policy or lack thereof has previously been an area which has been identified as requiring further work to meet the requirements of the indicator, and has previously been marked as an OFI.
- The due diligence process identifies any potential sites or land rights of cultural significance.
- There is native vegetation in proximity to one of the properties that has the potential for cultural significance, however this is outside of farm boundaries.
- Farm staff are highly involved with the local communities, including local schools, hosting field days and school field trips.
- Contact information for staff is available on SW’s website and on signage at the orchard front gates.

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

Employee qualifications
Chemical training accreditations
Work, Health Safety Management (WHSM) Chemical register
WHSM Safety Data Sheet (SDS) register
WHSM Storage compatibility
Safety management system hazard report
Safety management system learning management
Safety management system new incident report
SOP examples
Contractor risk assessment
Neighbour communications

Auditor Notes

- A general safety induction and training update must be completed annually by all employees.
- There are SOPs for all new machinery pieces and new employees must be signed off on all of these by the farm manager before they can operate them independently.
- Health, Safety, and Environment (HSE) representatives are on all sites.
- If there is not an existing SOP for an activity, a risk assessment is completed for the item to capture the risks and mitigate.
- The Safety Management System logs all training requirements and will automatically issue reminders when action or updates are required.
- SW have an online system for capturing and managing risk and incidents. I, if an incident occurs a high level or detailed Incident Cause Analysis Method (iCAM) is completed depending on severity of the incident.
- Weekly toolboxes are held for on- farm staff, where incident outcomes are communicated if relevant.
- More important information is communicated through incident alerts or email.
- The safety committee meets once a month, and is responsible for presenting findings, hazards, and learnings to teams.
- All those completing spraying are appropriately trained and chemical training certified.
- There are weather stations on arms, which inform whether spraying can be completed under the current conditions.
- Farm managers inform neighbours when spraying or completing other activities that will impact them (e.g. noise, dust). Neighbours are notified via a group Whatsapp for close neighbours or letter drops for more extended neighbours if required.

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

Anti-Discrimination and EEO Policy

Leave Policy

Parental Leave Policy

Recruitment Policy

Corporate Social Responsibility and Compliance Policy

Permanent Recruitment and Onboarding Procedure

Casual Recruitment and Onboarding Procedure

Code of Conduct

Workplace Bullying and Harassment Policy

Whistleblower Policy

Uniform and Presentation Policy

Media Policy

Auditor Notes

- SW maintains an Anti-Discrimination and Equal Employment Opportunity (EEO) Policy. The Policy considers complaint handling procedures and refers complainants to the Grievance and Investigation Policy.
- As part of the EEO policy, staff have access to interview guides and rating systems to support the recruitment process and for senior or management positions, there are multiple rounds of interviews.
- SW has a Leave Policy that provides annual, personal/carer's, compassionate, community service, long service and domestic violence leave. The Policy is applicable to full-time, part-time, and casual employees. SW also has a Parental Leave Policy.
- SW's Recruitment Policy requires all practices, processes, and decisions regarding recruitment are free from discrimination.
- SW's Corporate Social Responsibility and Compliance Policy includes worker health and safety provisions and states their intention to promote diversity and treat all persons equitably. Equity considerations include consideration regarding pay.
- SW maintains several policies that could support a safe, equitable, and professional work environment. SW's Code of Conduct requires all employees to comply with all laws, policies, procedures, rules, regulations, and contracts. The Code is designed to create a safe and comfortable workplace for the team.
- SW's Workplace Bullying and Harassment Policy covers all employees, contractors, and workplace participants in all functions and places that are work-related, including work functions such as Christmas parties. Bullying and Harassment Complaint Procedures are included in the policy.
- SW's Whistleblower Policy provides protection to whistleblowers, who may make reports anonymously.

**FINDINGS ORGANISED BY
PERFORMANCE MEASURE**

(Continued)

- SW has a Uniform and Presentation Policy which helps to contribute to a safe and professional work environment. The Policy supplies appropriate company uniforms to some staff based on their role, including hi-vis jackets, fire-retardant clothing, business shirts/polos, and more. Safety footwear is replaced on a regular wear-and-tear basis at management's discretion.
- SW's Media Policy clarifies expectations regarding posting on social media and interacting with any media outlets to support SW's reputation.
- SW runs a leadership course internally for executives and applicable team members.
- There is a staff training budget and each manager has a delegation of authority for training spending. During the budgetary planning process, managers meet with their teams to determine what training is required (e.g. chemical training certification), or professional development is wanted (e.g. conferences).
- There is an annual induction and policy review process in which all employees must review SW policies and procedures and sign off on their understanding.
- Copies of policies are stored on the SW intranet and on the staff management application. The policies are displayed in multiple languages.

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

SW Position Description Draft

Auditor Notes

- SW runs a leadership course internally for executives and applicable team members.
- There is a staff training budget and each manager has a delegation of authority for training spending. During the budgetary planning process, managers meet with their teams to determine what training is required (e.g. chemical training certification), or professional development is wanted (e.g. conferences).
- There is an annual induction and policy review process in which all employees must review SW policies and procedures and sign off on their understanding.
- Toolboxes are run at least quarterly, on a farm-by-farm basis.
- Toolbox documents and attendance lists are uploaded to SW's intranet and archived regularly.
- SW provided a draft templated position description for SW positions. The description includes requirements for safety, and adherence to company policies and procedures. The draft includes adherence to SW's "ESG and sustainability commitments by complying with all standards and sustainable business practices relevant to your role".

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

FreshCare and LH training records
LH training slides ALM
Freshcare and Leading Harvest Training records
Training slides

Auditor Notes

- SW has a sustainability policy that outlines their commitment to operating sustainability. It does not specifically refer to LH because it is designed to cover multiple standards that SW are accredited under.
- The Science and Sustainability unit is responsible for communicating the requirements of LH to staff and ensuring that the requirements are met.
- The business unit managers are involved in communicating requirements to on-farm staff.
- The finance team provide input for the GHG assessments using information that is routinely collected.
- Staff are highly qualified to support orchard management decisions that support LH objectives.
- The Science and Sustainability team have rolled out annual sustainability training that covers both LH and Freshcare requirements.
- The training includes why record keeping on farm is important.
- The training has been rolled out as farms have been selected for auditing, with the last of the properties to have training sessions in the next couple of months.
- SW provided training records and slides used to educate personnel about Leading Harvest Objectives and applicable BMPs.

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

Gratitude Day flyer
SW Pantry Poster
BE YOUR BEST Programme description
Study Assistance award letter

**FINDINGS ORGANISED BY
PERFORMANCE MEASURE**

(Continued)

Auditor Notes

- SW's HR department and on farm/business unit managers review wages to ensure they meet at least award rates, and are comparable to market rates.
- Annual reviews of all salaries are completed and a CPI increase is implemented after the annual reviews.
- SW has programs available to employees to contribute to a positive working environment. Programs include ""Gratitude Day""; which is available to permanent staff after six months of service. The program allows employees an additional day of leave to use however they choose. SW also has an employee pantry with snacks and meals available to employees for free.
- SW has a "BE YOUR BEST" Programme available to staff and their family members, where SW will consider discretionary funding or sponsorship for sporting or cultural pursuits.
- SW provided a redacted Study Assistance award letter, which was provided to a staff member. The award requires proof of successful completion of units from the staff member's university toward a degree and identifies additional financial contributions beyond their wages and paid study leave.

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

Management interview

Auditor Notes

- Farm labour crews are used every year.
- In the past, there was an agreement in place that outlined the Farm Labour Crew Contractor requirement to ensure they meet legal requirements.
- There is now a standard agreement that contractors are required to agree to that has been developed to meet all regulation requirements.
- SW then, within six weeks, complete an audit, in which they review a sample of records and match these to internal records and complete visa checks. The audits are completed every six months thereon.

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

Corrective Action Plan EcoVadis
Toolbox training slide deck
Code of Conduct
Redacted ESG Committee Meeting Report
Induction Paperwork
Toolbox Talk Records

Auditor Notes

- Compliance obligations are delegated to the different departments.
- Compliance registers exist for reporting compliance information to the board, and each department is responsible for providing this report for board reports.
- The Environmental, Health & Safety (EHS) committee and ESG subcommittee meet quarterly to review compliance information.
- New information including relevant legislation updates are communicated to staff via toolboxes, emails, posters and signage.
- The HR department and managers are signed up to notifications from SafeWork Australia, FairWork etc.
- There is local support for staff and the ESG subcommittee and a Natural Resources company that sits between Stahmann Webster and the investors.
- SW provided a slide deck related to Toolbox training. The training provides instructions to staff where to find the Code of Conduct, core principles, and bullying and harassment policies and procedures.
- Induction paperwork provided demonstrates relevant policies including Anti-Discrimination and Equal Employment Opportunity, Bullying and Harassment, Whistleblower Policy, Code of Conduct, and more are shared with new employees during their onboarding.
- The safety system is used to store training information.
- Farm teams are responsible for managing the compliance documents that relate to the farm (i.e. water licences).

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

Objective 11: Legal and Regulatory Compliance
11.2 LEGAL COMPLIANCE POLICIES

Conformance Evidence

Corporate Social Responsibility and Compliance Policy

Auditor Notes

- SW's Corporate Social Responsibility and Compliance Policy outlines principles to support SW's ability to conduct business in compliance with applicable laws and regulations. The Policy shares SW's commitment to provide equitable wages, ensure freedom of association, not employ minors below any applicable minimum age of employment, prohibit discrimination, maintain required workers' compensation insurance, and addresses modern slavery.
- Employment contracts are designed to meet International Labour Organisation requirements (ILO), based on Australian employment law being designed around these conventions.
- Employees must read and sign off on company policies upon employment and annually from then on.
- Employee and employer obligations are outlined in the position descriptions.
- No leases were included in the certification.

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

CAPEX Toolkit Template

Farm Management Tool Template

Freshcare Audit Reports 2024

EcoVadis Score

EcoVadis survey results

From the Ground Up, edition 13

Auditor Notes

- SW complete performance reviews on an ongoing basis rather than completing annual reviews.
- Managers are expected to meet regularly with employees and requirements are outlined in internal Leadership Training which SW managers are provided with.
- New employees are required to have three and six-month reviews during their probation period.
- Performance issues are managed on a case-by-case basis in conjunction with HR and in line with a performance improvement plan.
- Business objectives are set from an executive level and are reviewed annually.
- The business performance review is largely financial, assessing performance to budget.
- A risk and opportunity matrix has been developed for the business.
- Business sub-committees are required to set goals and report on their progress back to the executive team.
- Profit and loss across the business is calculated as crops are produced and harvest.
- Strategic planning sessions are held to plan and identify opportunities for improvement in the future.
- New machinery or innovation submissions are outlined in business case and/or CAPEX proposals which are nominated at a farm level, with internal support from the technical team to flesh out the ideas and put the proposals together.
- Those in head office then review the proposals and progress the successful proposals.
- Ideas for new innovations are usually developed by being involved with industry bodies, attending field days and usually all the farm managers get together annually to discuss opportunities and new ideas. This was paused this year due to a particularly bad season.
- SW submitted a grant application to a university last year for meters that test the water pressure in the trees. It wasn't successful in this instance but they may reapply this year.
- A new variety has been planted in some areas of the orchard, which will produce its first harvest this year.
- Overall, PSP Investments, the financial backers of Stahmann Webster, prioritise investment in technologies that are well researched and trialled, over completely new technologies, to ensure value from investment.

FINDINGS ORGANISED BY PERFORMANCE MEASURE

(Continued)

- The input data management system for recording spray applications is now used on farms, which records all the spray recommendations and applications.
- The farms have run trials on input chemistry and are looking at ways to replace Dormex in the orchards. There is a substitute identified that looks like it will work.
- SW provided a Farm Management Tool template, based on a Monitoring, Evaluation, Reporting, and Improvement (MERI) Framework. The tool asks for consideration in farm management planning to be given to corporate goals, industry alignment, and specific activities on farm that can support goals and improvement.
- Freshcare environmental is used to ensure that the business meets certification document requirements.
- Additionally, the Science and Sustainability team hold regular meetings with Finance and business unit managers, to review processes and possible improvements against the LH standard and Freshcare standard.
- SW provided an edition of their “From the Ground Up” publication that provides an overview of various crop types and current events related to crop production and staff compliance, including training reminders with QR codes.

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

Objective 12: Management Review and Continual Improvement

12.2 SUPPORT FOR SUSTAINABLE AGRICULTURE

Conformance Evidence

Redacted ESG Committee Meeting Minutes

Auditor Notes

- Projects are put forwards by the on-farm teams, which go through the Science and Sustainability team and depending on the budget, the project will be approved or be pushed to the next year.
- In the walnuts, the team has been working on a blight trial with a PhD student from a university.
- SW are working with a local university and the company that produces Biochar machines on a biochar trial at the walnut processing plant.
- Farm teams often work with chemical or other service companies to trial new products, new beneficials and the like.
- SW provided a redacted ESG Committee Meeting Report, which indicates SW sites are collaborating with universities to identify BMPs.

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

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						12.2.1

CONCLUSION

Results of the audit show that Stahmann Webster has a management system that meets the requirements of and is in conformance with the Leading Harvest Farmland Management Program 2025. SW'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

Program users in good standing who are enrolled in the Leading Harvest Farmland Management Program 2025 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 Program 2025 must be substantiated by a current, valid certification by a certification body recognised 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.

SPECIFIC FOCUS AREAS FOR NEXT AUDIT

Policy updates, biodiversity aspects, air emission reductions, and business LH processes will be considered key focus areas during SW's Recertification audit in 2026. In 2026, certification and audit efficiencies be improved by combining SW's existing four certifications into one LH enrollment, as the overarching management system is consistent across the four commodities.