



2026

Leading Harvest Farmland
Management Standard

**MANULIFE INVESTMENT MANAGEMENT,
TIMBERLAND AND AGRICULTURE
2026 RECERTIFICATION
AUDIT SUMMARY REPORT**

June 18, 2026

Manulife Investment Management, Timberland and
Agriculture
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June 18, 2026
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INTRODUCTION

This Audit Summary Report was developed by Averum, an accredited third-party certification body. Averum audited Manulife Investment Management, Timberland and Agriculture's (MIMTA) managed production agriculture properties. Averum was contracted by MIMTA in 2026 to conduct a recertification audit on 50,000-100,000 acres of managed properties to determine the effectiveness of MIMTA's management system. Objectives 1–12 of the Leading Harvest Farmland Management Standard (LH FMS) were included in the scope of this audit. There was no substitution or modification of any indicators.

Executive Summary

Manulife has performed well in demonstrating its management system's conformance to the Leading Harvest Farmland Management Standard. The properties we visited were extremely well managed on their own with professional and engaged management staff, with a variety of support programs from central management at their disposal.

Regional Managers interviewed in this year's audit have regional expertise, take initiative when needed, and assume responsibility to address challenges and emerging issues. Regional Managers and Certification Manager provided supporting evidence well in advance of site visits and demonstrated fluent knowledge of the Leading Harvest standard and its application to the operations they manage. Regional Managers interviewed in both regions demonstrate respect for and prioritize collaboration, education, diligence, and coexistence with natural ecosystems.

MIMTA's Certification Manager has demonstrated continuous commitment to supporting the efficacy and efficiency of organizing, coordinating, and maintaining responsibility for multiple divisions of MIMTA's management system regarding the Leading Harvest audit process, and is largely responsible for the translation of multiple committees, teams, and organizational structures within MIMTA's management system.

Specific Focus Areas for Next Audit:

Climate Risk preparedness will be a key focus area of MIMTA's next (surveillance) audit.

AUDIT TEAM RECOMMENDATION

Results of the audit indicate that Manulife Investment Management, Timberland and Agriculture has a management system that continues to meet the requirements of and is in conformance with the Leading Harvest Farmland Management System (LH FMS). MIMTA's enrolled acreage is recommended for recertification. MIMTA's next surveillance audit event should take place prior to June 2027.

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



Certification Decision

Program User: Manulife Investment Management, Timberland and Agriculture

Audit Dates: April 30, 2026–June 18, 2026

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

Certification Date: June 18, 2026

Status: Granted

Conclusion:

Results of the audit show that Manulife Investment Management, Timberland and Agriculture has a management system that continues to meet the requirements of the LH FMS and conforms with LH FMS criteria. MIMTA's enrolled acreage is recommended for recertification.

Standard(s) Within Scope of Audit

Leading Harvest Farmland Management Standard 2025 (Objectives 1–12)



Scope of Audit

Management system of 50,000 – 100,000 managed acres in the United States enrolled in the Leading Harvest program that are directly operated or managed via contract by MIMTA.

Accreditations:

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

Certification Number and Expiration:

AVERUM-LHFMS-2026-0045; June 22, 2029

Standard User Guidance–Leading Harvest Logo Usage:

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

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

AUDIT PROCESS

Audit Staff

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

Company Information

MIMTA (formerly Hancock Natural Resource Group) is a global asset manager focused on institutional-grade investments in timberland and farmland. MIMTA farm management staff and management contractors are responsible for the day-to-day farmland management activities for MIMTA's directly operated properties. MIMTA initially achieved certification for 100% of its directly operated agricultural properties in the United States in 2020.

Since the last audit took place, there have been no significant events that affect MIMTA's management system. MIMTA continues to trial and implement technologies to improve monitoring capabilities, such as Downforce Technologies and Integrated Biodiversity Assessment Tool.

AUDIT PLAN

Multi-Site Requirements

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

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

MIMTA site visits were conducted on a sample basis. MIMTA's management system provides oversight and is responsible for conformance activities for tenant-operated sites across multiple regions within the United States. MIMTA's Certification Manager is responsible for developing corrective action plans regarding LH FMS conformance and reporting them to MIMTA management. MIMTA's current review and monitoring process is effective and ongoing.



MIMTA 2026 Recertification Audit Plan

Audit Objectives and Criteria

The Objective of this Recertification Audit is to determine the effectiveness of the management system developed by Manulife Investment Management Timberland and Agriculture (MIMTA) and the continuing conformance with the Leading Harvest Farmland Management Standard 2025 Objectives and Performance Measures.

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

Substitution or Modification of Indicators: None

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

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

Scope: Management system of 50,000 – 100,000 managed acres enrolled in the Leading Harvest program that are directly operated or managed via contract by MIMTA.

Functional Units: Management personnel responsible for developing, implementing, and overseeing management practices that support conformance to LH FMS Objectives.

- Holly Evers – Environmental Certification Manager
- Michael Bretl – Regional Manager of Lake States
- Ty Alexander – Area Manager II of Western States

Audit Team

Linnea Abel – Lead Auditor

Brianna Griffith – Lake States Site Auditor

Jill Brodt – Pacific Western Site Auditor

Opening Meeting

April 30, 2026

Audit Team Deadline to Establish Evidence Portal Access for Evidence Requests

N/A; MIMTA to provide auditors with access to Leading Harvest evidence platform.

Management Interview

April 30, 2026 (following Opening Meeting)

**Site Visits**

Lake States – May 21, 2026

- Juneau Mather
- Juneau Yellow River
- Jackson Meadow Valley

California South – June 9, 2026

- Kern Lerdo
- Kern Crider
- Kern Muller

Initial Evidence Request

May 1, 2026

Evidence Submission Deadline

June 12, 2026

Auditor Deadline for Evidence Review

June 16, 2026

Closing Meeting

June 18, 2026

Expected Duration

4 – 6 weeks

6.75 Offsite Audit days

2 Onsite Audit days

Region

MIMTA's Lake States and California (South) regions represent 47% of directly operated acreage in the United States

Crop Types

Cranberries, almonds, pistachios, and citrus (orange, clementine, lemon, tangerine)

KEY FINDINGS

Audit Findings

Previous Nonconformance: Zero (0)

Major Nonconformance: Zero (0)

Minor Nonconformance: Zero (0)

Opportunities for Improvement: One (1)

Notable Practices: Seventeen (17)

Opportunities for Improvement:

1. 4.1.2. – Crop Protection

- Develop and implement a written standard operating procedure (SOP) or checklist for receiving and inspecting new plant material from nurseries to prevent loss from disease and pests in permanent plantings.

Notable Practices:

1. 3.1.2 – Regional Water Conservation

- Staff are proactive regarding Sustainable Groundwater Management Act (SGMA) management and Groundwater Sustainability Agency (GSA) participation. Staff maintain a proprietary calendar to attend GSA meetings and attend frequently. Staff provide operations and stakeholder perspective in participant and advisory capacities.
- Staff dedicated to monitoring California water regulations and supporting reporting requirements have developed a meter monitoring procedure for MIMTA's extensive network of flowmeters on sites. This practice has created the ability to leverage data to determine more precise extraction amounts and support management decisions on farms.

2. 3.2.2 – Water Quality Protection

- MIMTA has conducted water sampling analyses at Wisconsin sites for the past thirteen years. Its inlet and outlet sampling strategy, combined with this long-term data set, supports nutrient management decisions and improves understanding of the relationship between the watershed and regional cranberry production.

3. 4.1.3. – Pest Control Practices

- Farm management mitigated damage to dripline caused by hares and coyotes entering orchards and chewing on irrigation lines by providing multiple watering access points for vertebrates and installing a small fenceline. The project was implemented with the support of researchers and deemed an effective practice to control the issue while coexisting with natural communities.

4. 5.1.1 – Energy Conservation

- MIMTA conducted a peak hour cost analysis. Farm management uses the data to run pumps during non-peak hours and selects irrigation pumps that have been identified with higher efficiency. More efficient pumps are preferred to less efficient pumps to conserve energy.

5. 5.2.1 – Air Emissions

- One California almond site (not visited in 2026) began using sprinklers directed toward roadways, in lieu of diesel-powered watering trucks, to mitigate airborne dust. The solar-powered irrigation system can be activated when adjacent blocks are being irrigated, reducing fuel use, labor costs, and associated emissions.

6. 5.3.1 – Greenhouse Gas Emissions

- DownForce technologies is used to monitor Soil Organic Carbon levels at some sites. Baseline data has been gathered and is used to validate the work of the operations teams to improve the SOC levels.

7. 5.3.3 – Preparedness for Severe Climate and Weather Events

- In 2025, supplemental pollen was introduced to one ranch after it was determined that male pistachio trees were not producing sufficient pollen to meet the needs of female trees. Pollen was applied to female trees using a blower to improve pollination.

8. 7.1.1 – Species at Risk

- MIMTA continues best practices regarding the awareness of Species at Risk. Regional Managers visited keep species identification cards posted in shops and trucks to support continued awareness of Threatened, Endangered, and protected species.
- MIMTA also invests in a paid subscription to NatureServe which allows staff to use the data to overlay on internal GIS mapping.

9. 7.1.2 – Species at Risk Protection

- Lake States farm management participated in a project to build an osprey nest (ospreys are protected in Wisconsin) to deter nesting on power poles, which can catch fire.

10. 7.2.1 – Native Habitats and Natural Communities

- Further respect for natural ecosystems and coexistence with wildlife demonstrated in the Lake States through the development of a total of three acres of food plots for wild turkey and white-tailed deer and the development and maintenance of pollinator plots throughout the managed Lake States properties.
- Lake States Managers also supported the Wisconsin Department of Natural Resources (DNR) in mitigating the spread of an avian flu epidemic in 2025, by identifying and burying 75 sandhill cranes that succumbed to the illness. These efforts were documented in MIMTA's Significant Stewardship Projects slide deck.

11. 9.2.1 – Community Engagement

- MIMTA Managers prioritize community assistance projects using Manulife equipment, time, and are encouraged to do so through volunteer programs. Projects range in scale and scope of impact, which result in “small” projects that can have a big impact on individual neighbors in rural communities, such as assistance with tree removals and garbage removal from roadsides and neighboring properties.

12. 9.4.1 – Public Health and Safety

- MIMTA Kern County managers maintain a good relationship with their PG&E account rep. Management requested an on-farm safety demonstration that was provided to Farm Managers, irrigators and farm labor contractor (FLC) workers. The bilingual training included powerline safety and what to do in the event of fire or down power lines.

13. 10.1.2 – Respectful Work Environment

- MIMTA's Employee Resources Groups support venues to express and encourage workplace individuality and discuss challenges, tips, and relevant benefits while respecting differences in demographics.

14. 10.2.1 – Personnel and Contract Worker Training

- Farm management interviewed demonstrate perpetual commitments to safety and safety procedures on sites visited. Lake States sites observe an “Annual Safety Picnic” to celebrate employee safety programs in place year-round and include staff family and friends. MIMTA provided an extensive Tailgate Library with safety topics and materials provided in English and Spanish.

15. 10.3.2 – Employee Roles and Responsibilities for Sustainability

- Management staff interviewed support and participated in the Wisconsin Cranberry Leadership Development Program, hosted by the Wisconsin State Cranberry Growers Association. The program has five sessions designed to develop self-reflection, communication, and leadership skills relevant to the cranberry industry and applicable personally and professionally.

16. 12.1.1 – Performance Review

- Regional Manager interviewed encourages employees to develop stewardship and sustainability goals within their annual goals, always keeping it at the top of their mind and a part of their culture.

17. 12.1.3 – Agricultural Innovation

- MIMTA management's active role in the Wisconsin State Cranberry Growers Association (WSCGA) benefits bog management in the industry and on MIMTA properties by being involved in the community and remaining informed (and developing) best management practices. Pacific West sites further demonstrate willingness to partner with research extension to implement projects.
- MIMTA continues to invest in tools and technologies to better understand the multidimensional risks and opportunities of real asset management, such as DownForce and IBAT.

Review of the Previous Audit Cycle:

During the previous audit cycle, no nonconformances were identified. MIMTA's management system reflects the integration of Leading Harvest Objectives and Principles into its governing policies. MIMTA has multiple teams, committees, and specialists who directly and indirectly support LH FMS conformance. Regional Managers interact frequently with tenants and document property inspections.

PERFORMANCE MEASURE SUMMARY APPENDIX

1

SUSTAINABLE AGRICULTURE MANAGEMENT

1.1: Sustainable Agricultural Stewardship

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

MIMTA's stewardship principles outline their mission to continuously improve, adapt and integrate management practices in a way that embraces farmland stewardship values, delivering optimal long-term returns to clients while supporting communities and the environment.

Managers interviewed demonstrate stewardship principles through community engagement, and awareness and protection of bordering ecosystems.

MIMTA's stewardship principles emphasize the importance of prime farmland preservation for food security and reflect a commitment to working with stakeholders to support and protect agricultural land. MIMTA does not convert prime farmland to non-agricultural use.

Long-term conservation such as groundwater recharge or renewable energy generation areas are reserved for nonprime farmland only.

MIMTA's Sustainable and Responsible Investing (SRI) Toolkit classifies and organizes sustainability topics at each property in the portfolio. The Toolkits are used to explore sustainability themes during due diligence and weigh risks and opportunities. Themes are classified under climate, nature, and people.

MIMTA maintains a log of regenerative agriculture practices implemented across its portfolio. The inventory is updated annually by the Environmental Certification Manager, with support and input from Regional Managers. The inventory logs regenerative practices used on sites across MIMTA's United States portfolio.

MIMTA's "Agricultural Stewardship Commitment" outlines the organizational structure, principles, and policies that inform and guide MIMTA's investment management strategy.

Conformance Evidence:

Agriculture Stewardship Principles
SRI Toolkit
Regenerative Agriculture Inventory
Agricultural Stewardship Commitment



1. SUSTAINABLE AGRICULTURE MANAGEMENT

1.2 Critical External Factors

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

Critical External Factor forms are used by management to document and reflect on issues in an organized and sustainability-focused manner. Region and Area Farm Managers complete forms and submit them to MIMTA's Certification Manager for quality reviews and centralization.

Managers meet regularly to review Regenerative Agriculture Practices and maintain an inventory of practices implemented across each site.

All sites are managed according to site-specific conditions, with weather and water identified as the primary operational risks. Regional Managers complete Critical External Factor forms every two years, evaluating economic, environmental, social, and other relevant influences, including weather-related risks such as frost protection.

MIMTA provided slide decks that outline the general crop life cycle and activities, as well as an analysis of Strengths, Weaknesses, Opportunities, and Threats (SWOT) to MIMTA's cranberry operations in Wisconsin.

Conformance Evidence:

Critical External Factor forms
Regenerative Agriculture Inventory
SWOT Analysis
Cran 101 presentation

SOIL HEALTH AND CONSERVATION

2.1: Soil Health

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

MIMTA maintains a Soil Productivity Policy applicable to all direct-operated properties. The policy requires efficient use of nutrient inputs and soil monitoring.

Lake States Regional Manager meets the Department of Agriculture, Trade, and Consumer Protection (DATCP) requirements regarding Nutrient Management Plan (NMP) development by maintaining certified crop advisor (CCA) certification and is qualified to sign off on NMPs.

Lake States NMPs are developed to maintain appropriate nutrient levels and avoid overapplication and protecting waterways from nutrient runoff. Phosphorous and potassium needs are minimal. NMP narratives and records were provided for review for Lake States.

Western sites visited provided fertility records, including recommendations provided by a third-party vendor.

MIMTA reviewed a Nutrient Management Checklist with site auditor, which contains a 5-year management summary, including yields and compares NRCS recommendations. Lake States track nutrient data using the CranTrak digital platform. Sanding records were provided. Sanding stimulates plant growth and suppresses disease.

MIMTA follows the 4R's; Right Source, Right Rate, Right Timing, and Right Placement when managing its nutrients. The 4Rs framework is the foundation of the Natural Resource Conservation Service's (NRCS's) Nutrient Management Practice Standard.

Soil samples in lake states are taken in the spring, and tissue tests are taken in the fall, management will adjust their water use and practices based on a combination of these results.

Lake States managers observed cranberry overgrowth, which led the bog managers to reduce total nitrogen applications and conduct applications during targeted times. Granular nitrogen is preferred (24-0-0) to alleviate expense budget pressures. They have been able to reduce the fertilizer budget by 30 - 40% over the last three years.

Soil samples in lake states are taken in the spring and tissue tests are taken in the fall, management will adjust their water use and practices based on a combination of these results.



California sites visited are no-till operations. Resident vegetation is left in between rows to promote soil health and water infiltration. Cover crop is typically seeded during orchard development.

Conformance Evidence:

Soil Productivity Policy

CCA search

Fertility Plans

Fertilizer Recommendations

Soil tests

Tissue tests

Sanding records

Nutrient Management Checklist

2. SOIL HEALTH AND CONSERVATION

2.2: Soil Conservation

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

Sites visited have limited potential for wind erosion. MIMTA's Lake State sites implement several practices to prevent soil erosion related to water mismanagement. Ditches are routinely cleaned using excavators, and ditch slinging is performed to line ditches with materials that reduce erosion.

MIMTA's Soil Productivity Policy requires managers to monitor and strive to prevent soil degradation through soil conservation practices. Practices shall meet or exceed all applicable laws and regulations related to soil management.

Lake States Managers maintain vegetation on dikes and ditch slopes at a moderate height to minimize wash-in or wash-out. Managers interviewed supported a project to improve floodplains and mitigate erosion potential using grant funds. Land conservation and erosion control procedures are documented within the Biodiversity Plan provided for auditor review.

Soil compaction and erosion are not significant issues at the California sites visited.

Conformance Evidence:

Soil Productivity Policy
Biodiversity Plan
Quarterly inspections

WATER RESOURCES

3.1: Water Use

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

MIMTA's Water Use and Quality Management Policy requires managers to meet or exceed all relevant groundwater and surface water regulations, have appropriate processes and procedures to monitor water usage, and monitor groundwater levels where relevant.

Manulife has water specialists with dedicated staff to monitor water usage and conservation. Different staff members are dedicated to monitoring water across portfolios, and California specifically. The Groundwater Sustainability team focused on California advises on water issues and identifies water recharge opportunities.

Lake State sites use surface water to irrigate cranberry bogs. Sites visited remove water from reservoirs using pumps and drain water into those reservoirs as well.

Pacific Western sites only apply irrigation water to meet the needs of the trees. Weather data, evapotranspiration (ET) data from nearby California Irrigation Management Information System (CIMIS) stations, and soil moisture measurements (taken by probe 2 times per week) inform irrigation decisions.

Pacific Western sites use input from third-party agronomists to inform irrigation decisions including timing and amounts. Water usage varies year to year. As trees mature they require more water, and citrus generally uses less water than pistachios and almonds.

Pacific Western site visited uses surface water for irrigation and participates in a groundwater recharge project in collaboration with the Irrigation District. Two recharge ponds are available at another site visited to replenish the regional aquifer. Farm Managers anticipate that water usage will be reduced due to applied soil amendments.

Lake State sites use CranTrak, a digital platform designed for cranberry farm tracking and recordkeeping. Water usage is recorded in CranTrak. Records are easily shared and accessible. Water flow maps on cranberry farms are updated and used to assess where water will enter bogs, how it will flow, and exit in the most effective way.

Manulife staff are proactive regarding SGMA management and GSA participation. Staff maintain a proprietary calendar to attend GSA meetings and attend frequently. Manulife staff provide operations and stakeholder perspective in participant and advisory capacities.



Staff dedicated to monitoring California water regulations and supporting reporting requirements have developed a meter monitoring procedure for MIMTA's extensive network of flowmeters on sites. This practice has created the ability to leverage data to determine more precise extraction amounts and support management decisions on farms.

Conformance Evidence:

Water Use and Quality Management Policy
Water Usage reports
Nutrient Management Plan Narrative
Water Flow Maps



3. WATER RESOURCES

3.2: Water Quality

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

Western sites visited have water with higher salinity. In areas where deep wells contain saline water, groundwater is blended with district water to minimize salt concentrations. Water runoff is minimal due to soil characteristics. Soil has good permeability and high infiltration.

Lake state sites visited are adjacent to water reservoirs used for water recovery and irrigation. When the reservoirs become too full, they will inform neighboring cranberry farms they are going to open the dams to avoid flooding. Neighbors are able to use this water for irrigation.

MIMTA has conducted water sampling analyses at Wisconsin sites for the past thirteen years. Its inlet and outlet sampling strategy, combined with this long-term data set, supports nutrient management decisions and improves understanding of the relationship between the watershed and regional cranberry production.

Conformance Evidence:

Water Use and Quality Management Policy
Water Sample Data

CROP PROTECTION

4.1: Integrated Pest Management

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

MIMTA's Agricultural Chemical Use Policy states that integrated pest management (IPM) shall be the basis for all decisions involving the use of agricultural pesticides. MIMTA maintains an IPM Procedure, applicable to all directly operated properties to guide IPM decisions.

Lake States sites use materials with softer chemistries to protect bees, which are essential to cranberry pollination and production. California sites visited conduct applications at night during pollination to protect bees.

California sites make pest management decisions guided by pest control advisor (PCA) recommendations. PCAs scout frequently during the growing season. Spray applications are used when thresholds are met or preventively.

California sites address common pests including thrips, navel orange worms (NOWs), Asian citrus psyllids, and mites. Minimizing airborne dust, using sticky traps, and orchard sanitation including mummy shakes are performed to control common pests.

When sprays need to be conducted, managers interviewed review BeeWhere information. BeeWhere is a program used by farmers, beekeepers, and applicators that maps bee populations and allows users to communicate spray schedules and support protection of bee populations.

Lake States applications are conducted by licensed and trained staff. Sanding suppresses pest population. Invasive shrubs called "leatherleaf" are treated early in the spring to avoid disruption during the growing season. They will use water as another way to keep out pests by filling and draining the bogs.

Farm management mitigated damage to dripline caused by hares and coyotes entering orchards and chewing on irrigation lines by providing multiple watering access points for vertebrates and installing a small fenceline. The project was implemented with the support of researchers and deemed an effective practice to control the issue while coexisting with natural communities.

MIMTA maintains product usage reports. Reports contain the chemicals/product used, when they were applied, rates, amounts, and the applicant. MIMTA provided copies of product/pesticide use reports (PURs) and application records.

California Managers visit tree nurseries to inspect for disease and pest presence. MIMTA could develop and implement a written standard operating procedure (SOP) or checklist for receiving and inspecting new plant material from nurseries to prevent loss from disease and pests in permanent plantings.



California sites visited have large non-crop trees with owl boxes. Owls control squirrel populations. Boxes are placed and cleaned by a third-party vendor.

Conformance Evidence:

Private Applicator Certifications
Agricultural Chemical Use Policy
IPM Scouting forms
Quarterly inspections
PURs
IPM Procedure
Usage reports



4. CROP PROTECTION

4.2: Crop Protectant Management

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

MIMTA has quarterly inspections on all directly operated properties, ensuring farms are properly maintained and considered safe and in good condition.

MIMTA Lake States employees interviewed conduct applications themselves and are certified to do so. Licenses that require continuing education were provided for auditor review. Chemical jugs are triple rinsed in designated areas in the shop. Jugs are recycled by a vendor.

California sites use Farm Labor Contractor (FLC) crew members to conduct all spray applications. Area Managers hold Applicator licenses and review training for FLC members. Spray applications are only made during ideal conditions to prevent spray drift.

MIMTA provided Pre-Harvest Inspection reports that document inspection activities. Inspections are conducted to support food safety and product quality.

MIMTA provided copies of Pesticide Safety Inspections conducted in the Lake States sites. Independent crop consultants provide IPM reports weekly during growing season.

Conformance Evidence:

Agricultural Chemical Use Policy
Applicator licenses
Quarterly Inspections
Pre-Harvest Inspections
Pesticide Safety Inspections
IPM scouting forms/reports
IPM services invoice

ENERGY USE, AIR QUALITY, AND CLIMATE CHANGE

5.1: Agricultural Energy Use and Conservation

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

MIMTA's Energy Efficiency, Air Quality, and Climate Change Policy requires tenants and Farm Managers to consider air quality and energy efficiency when making property management decisions. Operations will support Manulife's greater decarbonization goals where relevant.

Lake States visited train employees to maintain equipment. Mechanics that specialize in certain areas are hired for jobs as needed.

Sites visited have shops with LED lighting. Most machinery operates on Tier 4 engines. Power usage and rate schedules are reviewed annually.

MIMTA conducted a peak hour cost analysis. Farm management uses the data to run pumps during non-peak hours and uses irrigation pumps that have been identified with higher efficiency. More efficient pumps are preferred to less efficient pumps to conserve energy.

Field Operations support staff conduct rate analyses, and are working to identify the costs associated with certain types of equipment usage. Annual reviews are conducted by support staff with all Managers to review power usage and rates schedules.

Sites visited use pumps with variable frequency drives (VFDs) to increase efficiency. Pump efficiency tests are conducted annually.

MIMTA maintains a Leading Harvest Renewable Energy tracker with renewable energy projects occurring at the time and the status of them. MIMTA establishes renewable energy projects where it is feasible within the region and with property-specific considerations. Prime farmland is not considered for renewable energy project development.

Conformance Evidence:

Energy Efficiency, Air Quality, and Climate Change Policy
Maintenance logs for equipment on property
Leading Harvest Renewable Energy tracker

5. ENERGY USE, AIR QUALITY, AND CLIMATE CHANGE

5.2: Air Quality

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

MIMTA's Energy Efficiency, Air Quality and Climate Change Policy requires practices that support energy use efficiency, alternative energy utilization, and minimization of atmospheric emissions will be used when practical and/or economically practicable.

Sites visited support energy reduction through regionally appropriate BMP usage. Lake States sites (cranberry bogs) use a sprayer boom with a wide span to facilitate sprays in one or two passes as opposed to several, which reduces fuel consumption and mitigates soil compaction.

Lake States sites are supporting MIMTA's decarbonization efforts with irrigation automation. Emails regarding "Emissions Reduction in Wisconsin" demonstrating collaboration between the Lake States' Regional Manager and the Decarbonizing Agriculture Working Group (DAWG) were provided for auditor review.

A California almond site (not visited in 2026) replaced diesel-powered watering trucks for dust suppression with a sprinkler system directed toward roadways. The system operates on solar energy and can be activated when adjacent blocks are being irrigated, reducing fuel use, labor costs, and associated emissions. Additional sites are being evaluated for installation due to the positive return on investment from reduced truck operation and fuel consumption.

MIMTA's ArcGIS retains farm data, including some data related to energy usage and efficiency. ArcGIS is a comprehensive geospatial and Geographic Information System (GIS) platform. The system interfaces with MIMTA's Farmland web app and other applications developed to support various MIMTA teams.

MIMTA provided meeting agendas for their DAWG and provided attendance records for meetings held in April 2025 and July 2025. The DAWG reviewed emissions sources in agriculture, reviewed emissions by crop type, and shared relevant greenhouse gas accounting information.

Decarbonization goals have included electricity use, fuel use, fuel types used on farms, rice production (methane), fertilizer usage, and types of irrigation.

California sites visited use custom harvest contractors who travel directly to the blocks they will harvest. Pre-harvest training emphasizes reduced driving speeds to minimize dust generation, and contractors are selected based on their adherence to these practices. Airborne dust is not a concern on Lake States sites visited.

California sites use contracted labor to perform regular equipment maintenance and maintain equipment inventories. Equipment inventory is tracked through a barcode-based asset management system maintained by Accounting.



The operation has invested in equipment to improve efficiency, including AeroFan and ExactApply sprayers. GPS tracking (Field-In) is used to monitor equipment usage and field operations. Select Western sites have trialed renewable diesel fuel for farm equipment.

Conformance Evidence:

Energy Efficiency, Air Quality, and Climate Change Policy

DAWG meeting agendas

Decarbonization project documents

Stewardship Policy

Emissions Reduction in Wisconsin

5. ENERGY USE, AIR QUALITY, AND CLIMATE CHANGE

5.3 Climate Smart Agriculture

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

Regional Managers and Farm Managers support Manulife's Resource Support Team by providing data used to quantify and meet decarbonization goals to develop GHG inventories. Lake States installed auto starts on irrigation equipment which led to significant GHG reductions.

New John Deere equipment is equipped with John Deere Operations Center (JD Ops).

Ranch Managers monitor pass efficiency of equipment drivers using the app and make improvements or adjustments as needed to ensure efficient passes are being made.

MIMTA uses Munich Re's Location Risk Intelligence Platform to gain a detailed understanding of potential climate risks facing each property, using it as screening and due diligence and when thinking about working in new geographies.

Lake states will adjust how much sand they use during the winter to aid with when the ice layer begins to melt, enhancing the soil drainage as well.

Frost sprinklers are used on almond and cranberry sites to protect against weather considerations. Cranberry farms will have sprinklers on timers so water and fuel is saved. The sprinklers system can be ran through the farmers phones, allowing them to easily turn them on if the temperatures get too low.

In the last winter, the Lake States had record snowfall. To adapt, MIMTA had dropped the water down more to ensure that there would not be flooding.

To prepare for potential droughts, MIMTA had made a 38 acre reservoir about 15 years ago at one Lake State Site, lining it with plastic to avoid erosion. They have not had to use it in those years but it has also become a habitat for wildlife.

Pistachio production was significantly impacted by extreme heat in 2025, which affected flowering and reduced pollination potential. Management noted that there are limited mitigation options once heat events occur. Supplemental pollen was introduced to one ranch after it was determined that male pistachio trees were not producing sufficient pollen to meet the needs of female trees. Young male trees are known to have lower pollen production. Pollen was applied to female trees using a blower to improve pollination.

Conformance Evidence:

Energy Efficiency, Air Quality, and Climate Change Policy
Climate Smart Fact Sheet
Regenerative Agriculture Inventory
Munich Re's Location Risk Intelligence Platform
Climate commitment overview
Munich Re's Location Risk
Intelligence Platform

WASTE AND MATERIAL MANAGEMENT

6.1: Management of Waste and Other Materials

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

The written Waste Management procedure requires DO properties to prioritize purchasing materials in bulk and in recyclable containers, properly manage equipment and materials, dispose of waste in compliance with applicable regulations, and repurpose crop residues when feasible.

Farmland Environmental Site Assessments confirmed compliance and identified no environmental issues.

MIMTA promotes reuse and recycling across operations to reduce waste and support environmental stewardship.

Lake State sites prioritize purchasing used or repurposed materials, such as oil filters and antifreeze, and coordinate internally to reuse tools across properties before ordering new items.

Equipment is often salvaged for reusable parts, with scrap metal recycled where possible. Some office recycling programs are in place, and materials such as used oil, oil filters, tires, and old irrigation lines are collected and transported to licensed recycling or disposal facilities through scheduled pickup services.

Farm Managers conduct quarterly inspections using detailed checklists and photo documentation to ensure compliance with regulatory requirements. In addition, DO sites utilize Farmland Environmental Site Assessments to confirm ongoing compliance and verify that no environmental issues have been identified.

Chemical and fuel storage practices follow consistent safety standards across regions. Lake State sites store chemicals in ventilated outdoor containers with clear labeling and segregation of dry and liquid materials. California sites use secured storage containers with proper labeling and separation by use. Fuel storage areas are equipped with secondary containment and spill kits to support spill prevention and response.

Conformance Evidence:

Hazardous Materials and Waste Management Policy
Waste Management Procedure
Farmland Environmental Site Assessment

6. WASTE AND MATERIAL MANAGEMENT

6.2: Food and Agricultural Surplus and Waste Resource Recovery

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

MIMTA maintains a Waste Management Procedure that requires sites to observe the waste hierarchy (reuse, repurpose, recycle, dispose) whenever possible. Procedures provide other guidelines such as ordering materials in bulk versus a greater quantity of smaller containers.

Pre-harvest checklists are used to ensure site readiness and prevent excessive crop loss by identifying and correcting issues prior to harvest. Checks include visual inspection of equipment for leaks, verification of PPE availability, and confirmation of required FLC documentation to prevent delays once harvest begins.

Ranch Managers complete the pre-harvest checklists and the Compliance team reviews submissions, flags missing items, and assigns corrective actions to ensure issues are resolved in advance. Area managers may also assign corrective actions directly to crews as needed.

Managers conduct site visit inspections to ensure sites are sanitary, orderly, and free of waste or trash.

At Lake State sites, some employees live on-site at no cost, allowing for rapid response to changing conditions such as weather events. This enables quick adjustments to water levels to help prevent crop loss. In cases where cranberries are deemed unmarketable, they are repurposed as compost.

California sites manage crop residue by grinding material and leaving in field as mulch to support soil health and build soil organic matter.

Conformance Evidence:

**Waste Management Procedure
Inspection Reports**

CONSERVATION OF BIODIVERSITY

7.1: Species Protection

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

MIMTA's At-Risk Species Management Policy mandates biological studies during the due diligence phase. MIMTA has an Environmental Services (ES) team that includes two wildlife biologists. Biologists provide tailored training for each site every other year.

Sites visited in both regions keep Threatened and Endangered Species identification cards posted in shops and in farm vehicles. Identification cards have colorized photos and descriptions to aid in the identification of relevant species with potential to occur on sites.

The Lake State sites work with Ducks Unlimited and the Natural Resources Conservation Service (NRCS) to support wetland habitat for waterfowl and conservation areas. They also have dedicated food plots for white-tailed deer and wild turkey. Managers interviewed will call the state's Department of Natural Resources when they have encountered injured or sick wildlife animals on farms.

MIMTA's corporate team began using the Integrated Biodiversity Assessment Tool (IBAT) which is a modeling software based off of the International Union for the Conservation of Nature (IUCN) Red List of Threatened Species, the World Database on Protected Areas, and World Database of key Biodiversity Areas in 2025. IBAT can be used as a screening tool for acquisition due diligence to inform MIMTA's understanding of biodiversity risks and opportunities associated with properties early in the acquisition process.

MIMTA uses IBAT's reports to deliver valuable site-specific information, such as Species Threat Abatement and Restoration (STAR) scores.

MIMTA invests in a paid subscription to NatureServe which allows staff to use the data to overlay on internal GIS mapping. Results are added to Biodiversity Reports, which provide property-level insight into the potential for relevant species to occur.

MIMTA helped replace a structure for an osprey nest, to ensure they have a habitat and deter nesting on other power poles which run the risk of catching on fire.

MIMTA's staff wildlife biologists conduct annual wildlife trainings to review threatened and endangered species in the area. The presentations include pictures, maps, diseases that may affect the wildlife, share wildlife management practices, and contacts for further questions.



MIMTA provided Biological Resources and Wetlands Assessments that document the nature, history, and settings of sites, including wildlife species observed during site visits.

Conformance Evidence:

At-Risk Species Policy
Biodiversity training attendance records
Species Identification cards
Osprey nest photos
Biological Resources and Wetland Assessment

7. CONSERVATION OF BIODIVERSITY

7.2: Wildlife Habitat Conservation

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

MIMTA has three staff wildlife biologists, one is primarily in the east, two in the West. Biologists supported the project implemented on Western site visited related to pest management. The initial design for the project involved burying buckets, but the design was updated out of fear that wildlife would fall into buckets and drown. The final design used barrels to provide water away from production and irrigation dripline.

MIMTA maintains Riparian Site Management and Biodiversity Policies that enhance riparian site protection and encourage the restoration and enhancement of natural ecosystems and wildlife habitats. Sites visited demonstrate research conducted during due diligence and ongoing awareness of relevant wildlife and care for surrounding ecosystems during management.

Lake States sites visited delayed mowing grass surrounding the cranberry bogs until goslings fledged to avoid disrupting their nests. Sites have established and maintain a variety of pollinator gardens, bat houses, and duck houses. Each property has an area dedicated to natural wildlife habitat. Lake States Managers also supported the Wisconsin DNR in mitigating the spread of an avian flu epidemic in 2025, by identifying and burying 75 sandhill cranes that succumbed to the illness. These efforts were documented in MIMTA's Significant Stewardship Projects slide deck.

MIMTA identifies potential ecologically important sites during due diligence. Biological Resources and Wetlands Assessments, Biodiversity Reports, and Biological Reviews for the sites visited were provided for auditor review.

Conformance Evidence:

Riparian Site Management Policy
Biodiversity Policy
Biodiversity reports
Biological Review
Site maps
Significant Stewardship Projects

7. CONSERVATION OF BIODIVERSITY

7.3: Avoided Conversion

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

MIMTA provided a copy of their Due Diligence Procedure, which includes a Phase I Environmental Site Assessment (ESA), Biological Review, American Land Title Association (ALTA) Survey, title report, SRI Toolkit, and inspections of buildings and infrastructure. Results of the due diligence summaries are reviewed by leadership. Sites with special features, such as wetlands, riparian areas, at-risk species, tribal lands, or other culturally or geologically significant features will result in specified management plans for those properties.

All sites in this year's sample are long term farmland and have not been converted from other uses or expanded from the time MIMTA took over management of the site. MIMTA is committed to avoiding the removal of primary forest or acquiring land that was deforested after 2003 in the United States. Definitions are borrowed from the Food and Agricultural Organization's 2015 Forest Resources Assessment. The policy explicitly states that MIMTA will not engage in deforestation, either directly or indirectly.

Reports conducted during due diligence for the sites visited were provided. Records include Biological Resources and Wetland Assessments, Biodiversity Reports, and site maps.

MIMTA provided a Sustainable and Responsible Investing (SRI) Toolkit to demonstrate active management of economic, social, and environmental factors. MIMTA's SRI Toolkit provides extensive information for each property, with topics mapped to the relevant area of sustainability and provide clarity regarding potential impacts.

Acquisitions Teams perform due diligence procedures, which include Phase I ecological and biological studies. MIMTA Vice President will review the summaries and participate in calls with findings, creating a plan on how to best manage the properties and maintain documents.

Conformance Evidence:

Due Diligence Procedure
Biological Resources and Wetlands Assessments
Biological Reviews
Site maps
Zero-Deforestation Policy
SRI Toolkit

7. CONSERVATION OF BIODIVERSITY

7.4: Crop Diversity

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

MIMTA maintains a Biodiversity Policy, which express MIMTA's commitment to maintain or enhance agrobiodiversity and biodiversity of agricultural landscapes through genetic and crop diversity, and the introduction, maintenance, or restoration of natural ecosystems as part of the broader agricultural landscape.

MIMTA provided bog maps with multiple varieties listed for sites visited.

Western sites visited have multiple varieties of permanent crops planted. Managers interviewed have observed varietal differences in pollen production. Future orchard developments would likely favor varieties that produce higher levels of pollen, or grafting those buds onto existing trees.

MIMTA's Redevelopment Process shows consideration for environmental factors, market trends, and lifecycles of current crops to support highest and best use of production farmland.

Conformance Evidence:

Biodiversity Policy
Agricultural Biotechnology Policy
Regenerative Agriculture Inventory
Re-development Process

PROTECTION OF SPECIAL SITES

8.1: Special Site Management

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

MIMTA personnel, including wildlife biologists, Area Managers, and the Certification Manager, have access to GIS mapping layers that identify special sites, riparian areas, and other sensitive locations on or near farm properties.

MIMTA's Due Diligence Procedure involves research that includes natural heritage data. The SRI Toolkits further evaluate sensitive lands, protected areas, and associated risks and opportunities.

The Audit Team met with MIMTA ArcGIS specialist, who demonstrated layers applied during due diligence procedures and property management. Layers can be modified to include cultural resources that support the identification of special sites. There are no special sites on the selected properties visited during this year's audit.

Conformance Evidence:

GIS Mapping tool
SRI toolkit
Due Diligence Procedure
Site maps

LOCAL COMMUNITIES

9.1: Economic Well-Being

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

MIMTA Managers interviewed source their supplies and on-farm needs through local vendors as much as possible. Sites employ full-time and seasonal labor from local communities. Although no formal internship program is in place, MIMTA has hired interns in the past, including local high school students in the maintenance department.

MIMTA's Board of Directors and Executive Leadership oversee the tax strategy. Formal committees have been established to review and approve significant transactions.

MIMTA's compliance team monitors contractors and audits payroll and licensing. Open jobs are posted via LinkedIn, Indeed, AgCareers, and the MIMTA website.

Conformance Evidence:

Management interview



9. LOCAL COMMUNITIES

9.2: Community Relations

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

MIMTA's Community Engagement Procedure contains MIMTA's commitment to engage with the community and foster positive relationships.

Managers interviewed participate in community events and make charitable contributions throughout the year. Sites visited have donated 470 pounds of food to a local food pantry, and coordinate with the state's DNR to maintain public campgrounds, pick up trash, mow, and repair roads.

Lake States Managers interviewed assisted with a neighboring bog's harvest, when a neighbor passed away unexpectedly. MIMTA staffed supported with management activities while the neighboring farm was looking for an operator.

MIMTA made a \$3,000 donation to the Hannah Center, which is a center dedicated to helping victims of domestic violence.

MIMTA hosts harvest parties, barbeques on the ranch, and provides gifts for employees to show appreciation throughout the year.

Conformance Evidence:

Charitable Contributions
Management interview
Community Engagement Procedure

9. LOCAL COMMUNITIES

9.3: Local Communities and Indigenous Peoples

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

MIMTA has a statement highlighting their respect for the rights of indigenous people and how they aim to engage with the community on impacts associated with farmland management and investments.

MIMTA maintains a Social Responsibility Policy that affirms its commitment to treating Indigenous Peoples fairly and in alignment with relevant laws, applicable treaties, and international conventions.

Due Diligence Procedures require management plans to consider culturally sensitive and tribal land management when applicable.

MIMTA's Neighbor Communication Process outlines how interested parties may contact the Regional Manager.

MIMTA has begun keeping a register of tribal lands within 10 miles of managed properties. Farm Managers interviewed demonstrate awareness of tribal communities near the properties visited.

Lake States Bog Managers are involved in local communities. Four Bog Managers are currently serving in local government positions.

Lake States staff support community maintenance efforts, including mowing public trails, removing fallen trees on neighboring properties, and keeping town parks clean, mowed, and free of waste. Managers support flood mitigation on public lands near the bogs during and after heavy rainfall events.

No community complaints or concerns have been received by sites visited. Sites have MIMTA signage posted, especially in highly trafficked areas so the public would have appropriate contact information.

Conformance Evidence:

Social Responsibility Policy
Due Diligence Procedure
Community Communication Process
Neighbor Communication Process
Indigenous Neighbors mapping



9. LOCAL COMMUNITIES

9.4: Public Health

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

MIMTA is committed to create a safe work environment through ongoing education, evaluation, and preventative planning. MIMTA's Safe Work Environment Policy states property managers and any subcontracted operators are responsible for the proper and ongoing education, evaluation, and preventative planning as well as equipment, oversight, and documentation of employees with regard to safety procedures.

MIMTA Kern County managers maintain a good relationship with the energy provider's account representative. Management requested an on-farm safety demonstration that was provided to Farm Managers, irrigators and FLC workers. The bilingual training included powerline safety and what to do in the event of fire or down power lines.

Managers interviewed conduct specialized safety trainings to facilitate special projects that require the use of large or unfamiliar machinery. MIMTA team members meets with the custom harvester ahead of harvest to review drop locations and key areas of use.

MIMTA has a safety compliance officer and safety programs that ensure Occupational Safety and Health Administration (OSHA) standards are followed. Sites visited conduct regular safety meetings. A copy of Safety Principles was provided for the audit team. Safety is a core value, and the principle states that no business objective will take priority over Health and Safety.

Sites visited paint trees near electricity poles to increase visibility and signal to drivers that the poles are present to avoid accidents.

Storage facilities are posted with no entry signs and kept locked. Safety Data Sheets (SDS) binders are maintained by Area Managers.

Pacific Western sites visited began using a safer alternative product to sulfuric acid to treat irrigation water and keep irrigation lines clean.

Conformance Evidence:

Safe Work Environment Policy
Safety Principles
Global Health and Safety
Weekly safety meeting slides

PERSONNEL AND FARM LABOUR

10.1: Safe and Respectful Working Environment

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

MIMTA's policies prohibit workplace discrimination, harassment, violence, and any form of retaliation for good-faith reports. The Code of Business Conduct and Ethics reinforces its commitment to equal opportunity, and the company's public materials reflect a broader commitment to diversity, equity, and inclusion (DEI). MIMTA is an equal opportunity employer.

In support of its DEI efforts, MIMTA offers employee resource groups that are open to all staff and provide a forum to discuss workplace challenges and share information about company benefits and experiences. An example is the Women's Quarterly Lunch, which provides space to discuss workplace challenges and benefits in a collaborative setting.

MIMTA's Employee Resources Groups support venues to express and encourage workplace individuality and discuss challenges, tips, and relevant benefits while respecting differences in demographics.

Training records for weekly safety meetings were provided for auditor review.

Employees are required to complete documented training, including sexual harassment prevention and unconscious bias, with additional annual training focused on discrimination, gender equity, and maintaining a respectful workplace. MIMTA hosts periodic trainings featuring guest speakers who are subject-matter experts. A meeting invite for the annual training was provided for auditor review.

MIMTA provides resources to staff to support their ability to identify unconscious biases, and provides tips to manage those biases. Resources are referred to as the "Unconscious Bias Toolkit".

Conformance Evidence:

2025 Sexual Harassment Prevention Training invitation
Training records
Toolkit for Managing Unconscious Bias
DEI Strategy
Unconscious Bias Toolkit
Discrimination Harassment and Workplace Violence Policy
Equal Opportunity Policy



10. PERSONNEL AND FARM LABOUR

10.2: Occupational Training

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

A strong safety culture is demonstrated across sites through extensive safety signage in shops and on farms, as well as regular inspections and structured communication. Shops and buildings are inspected monthly, and farm sites are inspected at least quarterly, with findings documented in the Velocity system. The system flags deficiencies and enables the assignment of corrective actions to responsible personnel.

Safety oversight includes weekly safety calls led by safety supervisors and biweekly meetings between Area Managers, FLC supervisors, and FLC safety representatives to review operations and address incidents with field teams. Safety training is provided in both English and Spanish, with attendance recorded, and FLC also trains new drivers on MIMTA equipment.

Farm management interviewed demonstrate perpetual commitments to safety and safety procedures on sites visited. Lake States sites observe an “Annual Safety Picnic” to celebrate employee safety programs in place year-round and include staff family and friends. MIMTA provided an extensive Tailgate Library with safety topics and materials provided in English and Spanish.

Conformance Evidence:

MFS Safety Principles
Training records
Monthly Facility Inspection Reports
Quarterly Marsh Inspection Reports
Tailgate Library

10. PERSONNEL AND FARM LABOUR

10.3: Supporting Capacity for Sustainability

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

MIMTA maintains a Roles and Responsibilities document to identify individuals accountable for specific LHFMS indicators. Personnel interviewed demonstrated a clear understanding of their responsibilities in maintaining LHFMS compliance, with a strong emphasis on continuous improvement in sustainable practices.

Regional Managers express a strong sense of ownership in achieving conformance and advancing sustainability efforts. In response to labor shortages in the Lake States region, the Regional Manager also developed a training program aimed at attracting talent, improving employee engagement, and expanding skill sets among existing staff. The training program includes modules dedicated to nutrient management, and has also contributed to more targeted fertilizer applications as well as improved employee retention.

A key component of the program is an annual Lake States employee meeting that reviews nutrient management practices and includes participation from external vendors, such as chemical manufacturers, to share updates on new products, regulatory changes, and yield-enhancing practices.

MIMTA provided a copy of their Environment and Policy Support Team's (EPST's) 2025 Annual Report. The report documents how the EPST team engages with regulators at local, state and national levels. Descriptions of support provided by Manulife's Environmental Services Team are included. The Environmental Services team engages and provides consultation to ag properties.

Employees are also encouraged to participate in the Wisconsin Cranberry Leadership Development Program, hosted by the Wisconsin State Cranberry Growers Association. This five-session program focuses on leadership, communication, and self-reflection, while also providing exposure to the cranberry industry, state government, and ongoing research supporting sustainable cranberry production.

MIMTA teams regularly collaborate across functions and engage with specialized groups such as biological resources, water resources, and GIS to support integrated management and compliance efforts.

MIMTA provided a recap of significant stewardship projects. Several of these projects were focused on community care and engagement, including the provision of cleanup for a nursing home after trees were knocked over by a storm.

Conformance Evidence:

Roles and Responsibilities - Leading Harvest, Org Charts
Roles and Responsibilities for Leading Harvest – Direct Operations
Stewardship Training records
Weekly safety trainings
2025 EPST Annual Report
Significant Stewardship Projects

10. PERSONNEL AND FARM LABOUR

10.4: Compensation

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

MIMTA relies on the internal Global Compensation Policy to provide employees with a clear outline of how compensation is decided using principles that align compensation with the MIMTA business strategy.

MIMTA participates in annual salary surveys to provide competitive compensation for the industry. MIMTA has two compensation review cycle windows each year, where promotions, salary increases, and bonuses are determined.

MIMTA uses a "Pay for Performance" compensation philosophy that awards employees when the company meets or exceeds performance metrics. Performance metrics are designed to align pay with results and ensure a balanced structure taking into account short, medium and long term goals and performance.

MIMTA's Incentive Plan Memo documents how stewardship activities are weighted and contribute to employee compensation.

Conformance Evidence:

Global Compensation Policy
MIMTA Compensation Central on company site
Incentive Plan Memo

10. PERSONNEL AND FARM LABOUR

10.5 Farm Labour

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

MIMTA uses FLC workers to support maintenance and operational tasks including pruning and harvest. FLC providers are managed through annual contracts that define services, terms, and required employee training, including safety requirements.

MIMTA shared documentation that demonstrates the distribution of their Vendor Code of Conduct (VCOC). The memo highlights updates to the VCOC, including updated expectations regarding grievance mechanisms and increased focus on human rights expectations. MIMTA also provided a description of their grievance mechanisms. Manulife's hotline is to be used to report any issues, and may be used by third parties.

FLC license status is reviewed annually prior to renewal, and related records are maintained. Area Managers work closely with FLC leadership and crews during key operational periods and maintain documentation of safety training attendance.

Lake States sites source contract labor through Badger State Staffing to support harvest activities. Some have transitioned into full-time roles. All contract workers receive safety and task-specific training on their first day.

Conformance Evidence:

MIMTA Vendor Code of Conduct
FLC license verification
Grievance hotline description

LEGAL AND REGULATORY COMPLIANCE

11.1: Legal Compliance

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

MIMTA maintains a Code of Business Conduct and Ethics. The document addresses performance and conduct expectations, conflicts of interest, human rights, human trafficking and slavery, and how it applies to staff and business relationships.

MIMTA provided an organization chart that presents their Risk and Compliance Team. This team is responsible for providing oversight and guidance for compliance aspects of farm management, along with the EPST. Safety consultants are hired to inform MIMTA of necessary requirements based on new regulations.

Sites visited had legal compliance requirements, such as OSHA posters and SDS posted in common areas.

Lake State sites management attend the Wisconsin State Cranberry Growers Association (WSCGA) Trade Show, informing them on new products, new regulations, and making connections with other cranberry growers.

MIMTA’s EPST Overview describes how the EPST supports compliance. EPST focus areas include environmental, foreign investment, infrastructure, labor, taxes, and water management.

Conformance Evidence:

Code of Business Conduct and Ethics Safety and Compliance Team Org Chart SRI toolkits w/ Risk and Opportunity Assessments Training attendance records EPST Overview
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11. LEGAL AND REGULATORY COMPLIANCE

11.2: Legal Compliance Policies

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				11.2.1 11.2.2 11.2.3 (N/A)	

MIMTA's Global Human Rights Statement describes their commitment to the principles established under the International Bill of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the United Nations Global Compact, and the International Labour Organization's (ILO's) core conventions.

MIMTA's Social Responsibility Policy outlines its commitment to supporting health and safety, fair treatment, non-discrimination, engagement with local communities, and Indigenous Peoples' rights. MIMTA's Social Responsibility Policy states that the company shall strive to operate in a manner consistent with relevant United Nations (UN) conventions that have been ratified by the countries in which it operates.

MIMTA's Discrimination, Harassment, and Workplace Violence Policy clarifies that discrimination, harassment, or violence will not be tolerated.

Stewardship Principles emphasize the importance of maintaining and enhancing the well-being of communities, respecting Indigenous groups, and supporting local economies.

Conformance Evidence:

Global Human Rights Statement
 Social Responsibility Policy
 Discrimination, Harassment, and Workplace Violence Policy
 Social Responsibility Policy
 Stewardship Principles

MANAGEMENT REVIEW AND CONTINUAL IMPROVEMENT

12.1: Farm Review and Continual Improvement

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

MIMTA provided copies of regular inspection reports for sites visited during this year's audit. Inspections of facilities and farms are conducted, documented, and reports are accessible to relevant management staff within MIMTA's ArcGIS database.

MIMTA has a Continual Improvement Process that describes how performance reviews, performance monitoring, and coordination between the EPST and Certification teams support conformance activities and continual improvement. Internal Audits for schemes relevant to management divisions are conducted and reviewed with staff.

Slide decks used to support the Continual Improvement Process were provided to demonstrate coordination of stewardship and certification efforts.

MIMTA employees participate in biannual reviews, where goals are established and reviewed with their supervisors. Documented reviews support the employee promotion process and compensation, including bonus consideration. The Incentive Plan Memo describes how stewardship activities contribute to compensation decisions.

MIMTA develops Flash Reports that document recent activities, market trends, and ongoing management efforts for MIMTA's managed properties. Flash Reports are distributed to relevant Area and Property Managers.

Monthly Management reports are completed by farm managers. The reports review farming activities each month at each site. Area managers meet bi-monthly discussing current events, employee issues, and share ideas.

Participation in conferences, webinars, and continuing education is encouraged, with MIMTA funding training opportunities and tracking annual training hours through systems such as Compass, Workday, and LinkedIn Learning.

MIMTA management's active role in the Wisconsin State Cranberry Growers Association (WSCGA) benefits bog management in the industry and on MIMTA properties by being involved in the community and remaining informed (and developing) best management practices. Pacific West sites further demonstrate willingness to partner with research extension to implement projects.

MIMTA continues to invest in tools and technologies to better understand the multidimensional risks and opportunities of real asset management, such as DownForce and IBAT.



ArcGIS serves as MIMTA's central platform for managing and sharing operational information, including infrastructure assets (e.g., wells, pumps, pivots, irrigation lines, and engines), property information, and inspection data. The system utilizes customizable dashboards tailored to different business units and operational regions, allowing information to flow between field operations and centralized databases.

MIMTA provides training to increase ArcGIS adoption and continues to expand system capabilities, including asset age tracking to support capital planning and budgeting. While operational data are shared with Downforce Technologies, Downforce-generated data have not yet been integrated back into the ArcGIS platform.

Conformance Evidence:

Continual Improvement Process
ArcGIS demonstration
Inspection Reports
Stewardship projects
Monthly Management Reports
Internal Readiness Review Reports
Flash Reports

12. MANAGEMENT REVIEW AND CONTINUAL IMPROVEMENT

12.2: Support for Sustainable Agriculture

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

Lake States sites have supported research conducted by the University of Wisconsin regarding carbon sequestration for several years. States have also worked with local universities and the Pollinator Partnership with their pollinator projects.

With employees on the town board, they have been able to work closely with local wildlife refuges and the state Department of Natural Resources (DNR).

MIMTA promotes employee development through initiatives such as monthly "Fuel Up Fridays," leadership programs, and community engagement activities, including Ag Day events and FFA fundraisers.

MIMTA personnel actively engage with industry groups, research organizations, and professional development opportunities to support continuous improvement and knowledge sharing. Staff regularly consult with local experts, including UC Advisors, to address production challenges, such as low pollen production in pistachios, and adjust management practices accordingly.

Employees participate in industry organizations and leadership programs, including Almond Board, American Pistachio, and ASFMRA programs, which provide training in leadership, budgeting, farm planning, and regulatory issues. Contributions to agricultural organizations are documented within MIMTA's Charitable Contributions log, shared for auditor review.

Conformance Evidence:

Support for Sustainable Agriculture
Charitable Contributions
Significant Stewardship Projects