

Renewable Resource Group

Mildura, VIC

LEADING HARVEST FARMLAND MANAGEMENT PROGRAM
2025 AUDIT SUMMARY REPORT: MANTA FARMS 2025 SURVEILLANCE I

15 August 2025



TABLE OF CONTENTS

Executive Summary 1

 Team Leader Recommendations 2

 Audit Staff 2

 Audit Scope 2

Introduction 3

 Scope and Objective 3

 Company Information 3

 Audit Plan 4

 Multi-Site Requirements 5

 Audit Results..... 6

Key Findings 7

 Review of Previous Audit Cycle 9

Findings Organised by Performance Measure 10

Conclusion..... 36

 Standard User Guidance 36

 Specific Focus Areas for Next Audit..... 36

EXECUTIVE SUMMARY

Renewable Resource Group

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Certification Date:

August 14, 2024

Recertification Due Date:

August 14, 2027

Certification ID Number:

Averum-LHFMS-2024-0017

Renewable Resource Group has performed well in demonstrating its management system's continued conformance to the Leading Harvest Farmland Management Program 2025 during this year's surveillance audit. With one property enrolled, it is clear to see the improvement that has occurred within company and property practices since enrollment with the Leading Harvest standard.

The systems in place to manage and provide documentation have been greatly improved and farm staff, including the recently appointed operational manager, were engaged and expansive in their answers during the audit process.

EXECUTIVE SUMMARY

(Continued)

Renewable Resource Group

LH FMP 2025 AUDIT SUMMARY REPORT

TEAM LEADER RECOMMENDATIONS

Audit Dates: 24/06/2025 – 15/08/2025

Corrective Action Plan(s) Accepted: N/A

Date: 15/08/2025

Follow-Up Visit Needed?: N/A

Date: 15/08/2025

Continue Certification: Yes

Date: 15/08/2025

All NCR Closed: N/A

Date: 15/08/2025

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 Renewable Resource Group's management system on their direct-operated property, Manta Farms, 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: Surveillance audit (year 2) to be completed in June 2026

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INTRODUCTION

This report summarises the results of the August 15, 2025 audit conducted on Renewable Resource Group's (RRG) managed Manta Farm property. 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 since 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 RRG to perform a surveillance audit of sustainability performance on 0 - 4,000 hectares of managed operations and determine conformance to the principles, objectives, performance measures, and indicators of the Leading Harvest Australian Farmland Management Program 2025 (LH FMP 2025). LH FMP 2025 objectives 1 through 12 were covered during the site visit to the Manta Farm property in Victoria. There was no substitution or modification of LH FMP 2025 performance measures. Indicator 8.1.2 did not apply to the enrolled acreage.

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

RRG is an agricultural investment firm that operates production farmland properties across Australia and North and South America. They aim to operate in a way that creates returns from sustainable agriculture, water resilience, habitat conservation and renewable agriculture. Manta Farms sits under RRG and is responsible for the day-to-day operations of the property.

RRG contracted with Averum to provide certification audit services for the Manta Farm property in 2024. The property became certified under Leading Harvest at the conclusion of the audit process in 2024.

During surveillance audits in 2025, the Victorian property was visited, with the farm and operational management hosting the auditor and providing guidance on the site. Managers overseeing decision making and standard compliance for sample region were contacted for evidence requests and interviews. The Manta Farm property is a representative sample of current practices in place and management decision making by RRG as it is the only property enrolled under the LH FMP 2025. The primary agricultural production on the site is table grapes.

AUDIT PLAN

An audit plan was developed and is maintained on file by Averum. An online portal was established for RRG coordinators to upload evidence and documentation securely for auditor review, and evidence was continuously uploaded throughout the audit. An opening meeting was held on June 24, 2025, preceding site visits. Following the meeting, a preliminary document review of the provided evidence was conducted by Averum. The field site in Victoria was examined on June 26, 2025. A closing meeting was held on August 15, 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

June 24, 2025

Attendees

RRG:

Jordan Isken, Louie Puleio, Gill Hay

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

August 15, 2025

Attendees

RRG:

Jordan Isken, Louie Puleio, Gill Hay

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

RRG maintains operations on multiple properties across Australia, however there is only one property enrolled under the LH AUS FMP 2025. Regional and farm managers are responsible for developing corrective action plans regarding LH AUS FMS conformance and reporting them to RRG management. RRG'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, the one site was chosen given the enrollment is limited to one site only.

AUDIT RESULTS

Overall, Renewable Resource Group's Manta Farm conformed to the objectives of LH FMP 2025. Interviews and document reviews were performed to determine procedural and documentation conformance to the LH FMP 2025. Documented evidence of practices was continuously supplied throughout the audit when requested. The field visit was performed on the one operating site in Victoria. The visit was conducted during the pruning and post-pruning season on the table grape property, so vine management was highlighted on site visits. Central management representatives, as well as farm managers, were present and interviewed to illustrate Renewable Resource Group'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.

Region

Victoria represents 100% of the enrolled table grape property.

Crop

Table grapes

Properties Examined During Engagement

One (1) site visited during the audit

- Manta Farms

Management Population

- One (1) farm manger
- One (1) operational manager

KEY FINDINGS

FINDINGS IDENTIFIED DURING THE AUDIT	
PREVIOUS NONCONFORMANCE	One (1)
MAJOR NONCONFORMANCE	Zero (0)
MINOR NONCONFORMANCE	Zero (0)
OPPORTUNITIES FOR IMPROVEMENT	Two (2)
NOTABLE PRACTICES	Three (3)

PREVIOUS NONCONFORMANCE

Renewable Resource Group achieved initial certification to Leading Harvest in August 2024. During initial certification, one minor non-conformance was found regarding indicator 9.2.1 community engagement, a non-conformance report outlining planned actions was approved by Averum.

MAJOR NONCONFORMANCE

ZERO (0)

MINOR NONCONFORMANCE

ZERO (0)

OPPORTUNITIES FOR IMPROVEMENT

6.1.2 RESOURCE RECOVERY

Recycling has not yet been separated during harvest, it is planned to occur during the next harvest season. Continue to monitor to ensure it is implemented.

11.2.1 WRITTEN COMPLIANCE POLICY

Opportunity for improvement is to extract relevant content from other policies into a single standalone policy.

NOTABLE PRACTICES

1.1.1 FARMLAND STEWARDSHIP COMMITMENT

Renewable Resource Group have a partnership with The Nature Conservancy (TNC) on their Sustainable Water Impact Fund and are committed to operating in a sustainable manner.

5.2.2 AIR-BORNE DUST CONTROL

The farm management staff have expanded the dust control measures on farm to include sprinklers to assist with dust suppression and support the planting of the permanent cover crops.

7.2.1 NATIVE HABITATS AND NATURAL COMMUNITIES

RRG have continued the program of native tree plantings, this time outside of property boundaries (with the relevant approvals). The native plantings have been supported by the installation of irrigation line to support their establishment.

KEY FINDINGS

(Continued)

Renewable Resource Group

LH FMP 2025 AUDIT SUMMARY REPORT

REVIEW OF PREVIOUS AUDIT CYCLE

RRG was initially certified to the Leading Harvest Australia Farmland Management Standard 2023 in 2024. The certification audit in 2024 identified five opportunities for improvement where further information may be required in the future.

In 2025, RRG's surveillance audit was conducted under Leading Harvest's updated standard the Leading Harvest Farmland Management Program 2025.

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 testimonial

LH Aus Farm Visit Report (pilot)

Manta Investment Parameters Follow Up Memo

RRG Responsible Investment Policy

Sustainable Ag Opportunities for Fifth Street

SWIF 2021, 2022 & 2024 Impact Reports

Auditor Notes

- In 2019 RRG became a signatory to the United Nations Principles for Responsible Investment and have partnered with The Nature Conservancy (TNC) on their Sustainable Water Impact Fund (SWIF) which aims to demonstrate sustainable management of water and soil to achieve better outcomes for the people and environment.
- The business’s Responsible Investment Policy addresses the environmental, social and governance aspects.
- TNC Framework agreement outlines the businesses commitment to meet these minimum standards. The conservation outcomes that are the focus of the framework agreement are budgeted on a project-by-project basis. Efficiency of resources is a strong focus in property operations as it not only provides environmental benefits, but also is more cost efficient.
- For new properties there are a set of requirements that have to be met for the NC partnership. On established properties, there is a program for employees to track the progress of the biodiversity projects. RRG are required to report progress against the projects, and if progress is not made in a year, a donation is required to be made to the NC instead.
- Larger scale projects are monitored at a RRG level, with farm employees requested to fill out forms with farm specific information.
- There is not a written policy on farmland conservation, however it is not in the ethos of the business to convert out of production farmland, unless there are marginal areas that could provide greater environmental and biodiversity value if habitat is restored than it does as agricultural production land. This is determined based on soil assessments that are completed during due diligence.
- This property was purchased in a rundown state in late 2020 and significant work has been completed since to improve the agricultural production value of the property.

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

Manta Farms monthly reports

Auditor Notes

- Crop suitability models are completed at due diligence, using climate scenario datasets, to confirm if crops are suitable for the temperature scenario predictions. Additionally, water availability modelling is completed to ensure the right mix of water rights that would be required to sustain the planned crop are available.
- The business is looking at diversifying the vine types to ensure all the vines are not fruiting at one time and therefore minimising the risk of losing entire harvests.
- During the budgeting process, comparison pricing is reviewed, and fertiliser costs and rates are based on the vine growth stage.
- A property risk assessment is completed based on soil, water and heavy metal testing each year.
- Monthly reports are collated during operations and learnings are taken from these. There is one block on the farm which is not thriving due to soil types so this will be pulled out and replaced with a more suitable variety.

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

Manta Farms agronomist reports

Soil test results 2023, 2024 and 2025

Foliar fertiliser records

Ground fertiliser records

Soil comparison 2024 vs 2025

Manta Farms monthly reports

Dripline Fertiliser Application Record 2025

Vineyard Improvement Log

Auditor Notes

- Cover cropping in interrows has been upgraded to permanent species with a mix of pasture and pulse seeds.
- Sprinklers have been installed under vines to help maintain the cover crop.
- Wire weed grows in some of the interrows across the orchard in spring, but this will be controlled now that a permanent cover crop is in place.
- Soil testing was last completed in May this year, four areas with the worst salinity results from last year was retested. The results came back higher than last year. Along with other mitigation strategies such as permanent pasture establishment and drainage, sprinklers were utilised to try and flush the salts down the profile.
- Gypsum was also applied across the property, however due to the very low rainfall year, no impact has yet been seen. Therefore, flushing of the profile will be the predominant management method for now and sodium based fertilisers are avoided.
- Follow up soil testing was completed after the profiles were flushed twice, the results of which are yet to come back from testing.
- The farm management team have put together a plan for managing problem issues over next twelve months on a block by block basis. Soil management actions included in the log, included the introduction of permanent cover crops, which has now been implemented.
- Organic matter on the farm is higher than average for the Sunraysia region of Victoria.
- Tissue testing has been conducted in the past, it will probably be completed twice a season once they are harvesting larger amounts.
- The farm team are also now working with four different agronomists (internal and external) who are providing recommendations for fertiliser applications and vine health management.
- Baseline fertiliser program is developed for the budgeting process and revised throughout the season depending on weather conditions. Over the last season, less fertiliser was applied due to the dry conditions. Instead, irrigation applications were higher.
- FarmingOne is currently being used to track applications, but currently transitioning to the LiveFarmer program. Paper records are being used in the interim.

**FINDINGS ORGANISED BY
PERFORMANCE MEASURE**

(Continued)

- The external agronomists visit once a month during growing season, and every two months for the rest of the year. The field representative for fertiliser and chemical supply is also a qualified agronomist and is on farm every couple of days.
- First prune was done this year, mulched back into interrows. Grapes leftover from harvest were taken off, put into interrows and mulched in.

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

Manta Investment Parameters Follow Up Memo

Vineyard Improvement Log

Risk assessment form - erosion control

Auditor Notes

- There are no issues with erosion as the permanent cover crops have now been planted and sprinklers have been installed to maintain them over summer.
- Salinity and pH are the underlying issues across the property. Gypsum has been applied, but due to the dry conditions it has not had the required impact.
- Flushing of the soil profile is now being completed to push salts out of the root zone.
- The drainage upgrades have improved the water flow on farm. No water sits on farm anymore, although this year has been particularly dry. Liquid gypsum has been applied to improve water infiltration, organic matter and assist with the permanent cover crop establishment.

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

Manta Water Meter Readings

Water use licence

Manta Farms monthly reports

Irrigation report

Auditor Notes

- Water allocations are from the Lower Murray Water (LMW).
- A MAIT Industries branded irrigation system is now used on farm which is linked to the new weather station installed on farm.
- A full time water manager has been employed and he will be keeping excel spreadsheets separately as well as using the MAIT tracking capabilities.
- Water takes are telemetered on the gate into property and internally meter reads are completed regularly as takes are reported internally and tracked against the allocation over the season. Water usage reports can also be provided by LMW.
- The farm monthly reports which are provided to the board, outline the expected water use (budget) and record actual against budgeted.
- Water budgets are completed prior to irrigation seasons by using historical data (expected ML/ha per block) for varieties, crop stage, temperatures, climate, etc. These numbers are determined in conjunction with the farm and regional managers. A percentage of the annual expected water use is determined for each month, based on expected weather (e.g. rainfall, temperature).
- Water usage is reviewed monthly, or even fortnightly later in the season.
- Applications all recorded in an Excel spreadsheet.
- Additional applications will occur over winter this year to build the canopy going into next season.
- Under vine compost was applied the season before last, and applications will likely be repeated in the next year or two.
- Cover crops help build the organic matter and therefore water holding capacity of the soil and prunings will be mulched once pruning occurs.
- The water use is increasing over the years as the vines mature. Additional water can be purchased as necessary.
- Soil moisture probes have recently been installed (MAIT), with eight placed around farm in different soil types and varieties. The probes read humidity, ground temperature and soil moisture.
- The probes are linked to the irrigation system and they can be set up to turn the irrigation on automatically based on a soil moisture trigger, but further ground truthing and calibrations will be completed before the farm team consider using this capability.
- The weather station information is now linked to the MAIT system to feed into the irrigation scheduling programme.

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

ChemCert certificates
E. Coli water test results
SOP Mixing Chemicals
Spray records 2024

Auditor Notes

- Spraying is all completed internally by ChemCert accredited employees based on the agronomist recommendations.
- The farm manager holds toolbox talks or will speak to the lead contractors and define no go zones.
- Weather conditions including humidity and wind, spray rates and other spray application information is all recorded on spray logs. The new weather stations are used to inform the spraying practices on farm.
- Fertiliser applications is largely via fertigation and all applications are now based on soil tests and agronomist recommendations.
- Irrigation is via drip irrigation on farm and soil moisture probes monitor water movement through the profile.
- There are no natural riparian zones on or within proximity to the property. Water resources include the LMW channel and irrigation dam on the farm.
- The dam has been HDPE lined, which has significantly improved management capabilities and the dam can be emptied before being refilled if required.
- Sub-surface drainage is directed to drainage pits on farm, which can be directed to the evaporation storage, a large shallow storage for evaporating excess drainage water.

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

Manta Farm Fertility Report
Pest Control records
2024-2025 Spray Diary with ingredients
Vineyard Inspections records 2025
FSQ DOC 10 IPM PROGRAM

Auditor Notes

- An external pest scouter completes the farm pest and disease inspections. The pest scouter comes every fortnight and provides reports on pest and beneficial numbers, and recommendations for control. The farm manager then coordinates with the fertiliser and spray representative to select a product for control. The pest scouter monitors success of the control method at the next visit.
- Spray products and timing is selected to support and avoid impact on beneficial insects on farm. Particularly, given the high number of lady bugs on farm. Spray applications are only completed based on pest and disease thresholds.
- A slasher is used on farm for weed control and the cover crops are slashed periodically, however control is avoided until spring when preparation for spraying and harvest begins. The slasher will also be utilised instead of spray for weed control on the mounds as the vine age and make it more practical.
- Reflective ribbon has been installed through the vines in areas where the birds have the most impact.
- The farm manager is investigating options for ferrets or alternative control for rabbit control.
- A baiting program is in place for around the infrastructure points as per Freshcare requirements. Bait stations are updated monthly during harvest and every 3 months outside of harvest periods. Records are maintained in a folder in the office.
- All contractors and staff are required to be inducted to site, and visitors must sign in upon arrival. Biosecurity is covered in the online induction, and contractors are expected to arrive on site with clean machinery. Agronomists use the on farm machinery to get around the farm.
- The farm manager is looking to landscape the area near the washdown bay to include reed beds for washdown water treatment. A project timeline is expected to be determined by the end of the year.

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

ChemCert certificates
DrumMuster receipt 2025
ACUP certificates
2024-2025 Spray Diary with ingredients
ChemClear reference 2025
SOP Mixing Chemicals

Auditor Notes

- All spraying is completed internally by ChemCert accredited employees in line with recommendations from the agronomists.
- Weather stations are now on farm to inform spraying applications. Paper spray log records are maintained as the transition to the new electronic system proceeds.
- Chemicals are stored in a chemical storage shed on farm.
- Chemicals for the season are purchased on an as-needed basis, to avoid bulk storage unless specific products are in limited supply.
- Safety data sheets (SDSs) are available on AgWorld and spill kits are located at the storage.
- A stocktake is conducted every quarter on the chemical shed storage. If chemical is out of date it is registered for ChemClear, who complete periodic pickups in the region.
- Intermediate Bulk Containers (IBCs) are returned to the supplier and small drums are taken to DrumMuster.

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

Manta Farms solar PV assessment

Auditor Notes

- Management have reviewed the costs of power and changed the provider to lower costs.
- There are plans to look at more energy efficiency initiatives in the future, however the dam and drainage upgrades have been the priorities in the last year.
- An assessment has been undertaken into the feasibility of a solar installation on the packing shed roof. This will be further considered in the coming year.

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

Safe Operating Procedures (SOPs) efficient machinery use (SOP per machine/job)

Auditor Notes

- Purchasing decisions are made taking into account the fuel efficiency of machinery, and the last tractor purchased was due to this.
- HSI Donesafe safety management system is used to track machinery services, which are completed by a third-party contract mechanic.
- All staff are trained on the Safe Operating Procedures (SOPs) for each machine before they operate them independently, which covers efficient machinery use.
- A single row machine is used over a three rower on the side of the hill where a three rower would be ineffective.
- Traffic management plans are in place during harvest periods for safety and efficiency purposes.
- Toilets are provided around the vineyard blocks to minimise traffic movements during harvest.
- To manage dust and support the cover crop, dust suppression sprinklers were installed and further sprinklers will be installed on the headland. Once the headland sprinklers are installed, it is likely that a cover crop may be planted there. Previously overhead sprinklers were used, but they have been lowered to be more effective in managing dust, providing cooling and supporting cover crop growth.

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

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

5.3 CLIMATE-SMART AGRICULTURE

Conformance Evidence

Emissions data collection sheet
Carbon results guide
Drainage design plans
Manta 2023 Emissions Results and Discussion

Auditor Notes

- Greenhouse gas (GHG) emission assessments have been completed using information direct from the farms.
- Based on these assessments, the farms are encouraged to source materials and other resources which are low emission.
- The emissions results and discussion provided for Manta Farms from 2023 outlines the current emission profile, expected growth with farm development and strategies for reducing emissions, including highlighting solar as a strong option for electricity mitigation.
- Drainage upgrades have been finished to move water off the production areas. The drainage system is then directed to an evaporation pond. Although they have been effective since installation, it is noted that it has been a very low rainfall year.
- The improved drainage system is expected to be able to mitigate flash flooding outcomes, to move the water off the production areas in a timely manner. Last time the property flooded, water sat on farm for two weeks.
- To support soil moisture retention and build organic matter in the soils, prunings will be mulched in and permanent cover crops have been planted and the sprinklers moved lower to support their growth.
- There are emergency response and evacuation plans for personnel on farm, including maps in all rooms of evacuation points and assembly areas.
- Emergency reponse procedures are included in induction processes. Inductions have now been improved to include video content as well.

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

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

Conformance Evidence

DrumMuster receipt 2025
Waste invoices
ChemClear reference 2025

Auditor Notes

- Skip bins for solid waste are collected on an as needs basis.
- Small chemical drums are taken to DrumMuster and Intermediate Bulk Containers (IBCs) are returned to suppliers.
- Historical waste from the previous owner has now been removed. Most of it had to go to general waste due to contamination from soil and non-recyclable material.
- Old posts were donated to the school for a new fence.
- The farm manager orders in bulk where possible to reduce packaging. This will likely increase as the vineyard matures and usage increases.
- Recycling is not yet separated, however there was significant cardboard use during harvest, so it will be separated in the coming year.
- Oil from services is taken away by the service mechanic.
- Some old chemical has been registered to be removed by ChemClear.

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

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

Conformance Evidence

Safe Operating Procedures
Grapes - Packed Product Inspection Jan-Feb 2025
Adora bunch bags

Auditor Notes

- The farm management team focus on growing practices to reduce any waste grapes from the harvest period.
- Harvest casuals are trained on correct picking procedures and checks are completed as pickers move through the rows to ensure grapes are not missed.
- The harvested grapes in crates are checked at the door as they arrive at the packing shed and inspections are logged in the QA system. Inspections will be transitioned to LiveFarmer once it has been rolled out.

FINDINGS ORGANISED BY
PERFORMANCE MEASURE

(Continued)

- Any grapes remaining in the vineyard are knocked to the ground and mulched in.
- Once pruning is required, prunings will also be mulched in to the inter-rows.

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

Objective 7: Conservation of Biodiversity

7.1 SPECIES PROTECTION

Conformance Evidence

Native Veg Assessment Fifth Street

Auditor Notes

- As part of the farm's partnership with TNC, they completed a survey of all species present, potential impact of the planned operations and opportunities for replanting/improving existing habitat.
- Impact on vegetation and therefore species was expected to be completely mitigated with the inclusion of a buffer in one location.

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

Objective 7: Conservation of Biodiversity

7.2 WILDLIFE HABITAT CONSERVATION

Conformance Evidence

Revegetation Plan Manta Farm

Auditor Notes

- Surveying as part of the partnership with TNC also included native vegetation, habitat and ecological sites present, potential impact of the planned operations and opportunities for replanting/improving existing habitat.
- The biodiversity habitat improvement areas have had issues with pest incursion. Rabbits have eaten some of the planted trees (and some vines have been affected). Some trees have been replanted to replace those that were eaten. Tree guards have been put around them and some older plantings as well.
- The farm manager has spoken with the Department of Primary Industries (DPI) and a pest control company about control. The DPI couldn't do anything, as it was not affecting enough landholders.
- Cover crops are maintained in the inter-rows, with sprinklers now installed to maintain the inter-rows year round, which provides habitat for insects and forage habitat for birds.
- The farm management team has continued the program of native tree plantings, this time in the road reserve outside of the property (with relevant permissions) to improve habitat. Irrigation line has been installed to sustain the trees while they are young.

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

RRG Deforestation and Land Use Policy
Risk assessment - native vegetation
Deforestation policy updates (email)

Auditor Notes

- No clearing has been completed on farm by RRG’s management team.
- Manta's deforestation policy outlines it's commitment to avoid conversion of high value and ecologically important communities and sites.
- Manta have a 'no clearing' policy in addition to RRG's deforestation policy. The TNC framework agreement also covers the conservation value and carbon stock value of the property. RRG's deforestation policy has used the cut-off date of 2014, as this is identified in other certifications that require zero deforestation (in industries such as cacao and coffee). The zero-deforestation policy relates to primary forest or natural ecosystems of high conservation value and in areas of high carbon stock. It does not completely ban deforestation of other forest types under the relevant legal approvals.
- The due diligence process assesses previous land use and looks at aerial imagery and other tools from 2014 to present day to assess land use change. Secondary regrowth, particularly in areas where there is high regeneration, is a primary concern as well, and is carefully assessed during this review. Mallee would not necessarily be assessed under the deforestation policy as it would not be classed as forest, but it would be captured under the TNC framework agreement which captures sites of high conservation value and ensures there is not significant negative impact. While there haven't been any cases where native grasslands have been a primary concern, these would also be assessed as having high conservation value.
- The policy is unlikely to change to a zero deforestation policy, as RRG believes the due diligence process appropriately protects habitat.
- There is an accountability framework and use the global forest watch, through consultation with high conservation value areas and high traffic areas. Deforestation is often limited to isolated patches of minor habitat value areas within a highly developed area, rather than clearing areas of higher habitat value.
- RRG are undertaking an investment parameter review with TNC.

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

Objective 7: Conservation of Biodiversity
7.4 CROP DIVERSITY

Conformance Evidence
Manta Map of Varieties

Auditor Notes

- There are eight different varieties of grapes on the farm, and two different root stocks, which have been selected based on their suitability to the area and to meet market demand.
- The root stock is selected for vigour and tolerance to different soil types.
- Cover crops are maintained in inter-rows, with low sprinklers installed this year to sustain them year round. The permanent cover crop is a mix of rye grass and fescue.
- There have been native plantings in the shelterbelt alongside the property to support native wildlife and pollinators.

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

Cultural heritage study

Auditor Notes

- Assessed during due diligence.
- No sites are located on the property.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						8.1.1

Objective 9: Local Communities

9.1 ECONOMIC WELL-BEING

Conformance Evidence

Invoices for goods and services

Auditor Notes

- The Manta Farms accounts team are responsible for payments to vendors.
- Services and materials are generally found locally, although some are sourced from overseas where required.
- The farm employs local personnel for permanent positions, with labour shortages no longer a problem.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						9.1.1

Objective 9: Local Communities

9.2 COMMUNITY RELATIONS

Conformance Evidence

RRG handbook - matching gifts policy

Manta Farms - donation policy

Auditor Notes

- The farm management team would like to donate employee time to assist council and community organisations do rubbish pickups etc. but this is not yet under a policy or process in the business.
- The farm hosted a Biggest Morning Tea to raise money for the Breast Cancer foundation recently.
- Manta Farms has a donation policy in place, which outlines the structure which prohibits monetary donations by Manta Farms. Due to RRG's management of Manta Farms as part of the RRG Sustainable Water Impact Fund, monetary donations made from any fund assets is strictly prohibited by the U.S. Securities and Investment Commission.
- Employees are instead encouraged to contribute to the community in other ways.

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
RRG Responsible Investment Policy

Auditor Notes

- Renewable Resources Group’s Responsible Investment Policy and its donations policy refers to the relationship between the business and these local communities, and in the case of the Responsible Investment Policy, the local indigenous communities.
- No engagement is currently undertaken with the local indigenous community and there are no plans at this stage to engage unless enquiries or concerns are raised.
- The due diligence of sites identifies any sites or land rights that cover the property enrolled but no further work has been completed.
- The contact numbers are available on the front gate. No complaints or concerns have been received from local communities.

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

ChemCert certificates
Employee Induction Booklet
Labour Hire Induction Booklet
Contractor Induction Booklet
Labor Code of Conduct
Training and Induction Procedure_Safety Framework
SOP Mixing Chemicals
FSQ DOC 11 tool box register

Auditor Notes

- The spraying is all completed internally by ChemCert accredited employees. A new weather station and rain gauge is now on farm to ensure conditions are appropriate prior to spraying.
- Records are largely paper based while the transition to LiveFarmer, an online farm management and quality assurance program, occurs.
- All contractors and employees must be inducted on to farm.

**FINDINGS ORGANISED BY
PERFORMANCE MEASURE**

(Continued)

- Safety systems are run through Donesafe.
- Hazards and other safety topics are covered in toolboxes.
- Visitors and contractors are required to sign in and follow farm safety protocols.
- Neighbours are notified of works that may impact them, and consideration is given to neighbours and wind speed when spraying.

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 Policy
Equal Opportunity Policy
Probation Policy
Policy and Procedure Acknowledgement
RRG Diversity and Inclusion Policy 2020
FSQ DOC 11 tool box register
Insurance certificate of currency

Auditor Notes

- RRG and Manta Farms have policies on equal opportunity and anti-discrimination. Jobs are advertised through seek or agencies with no restrictions on who can apply. Assess applicants based on skill set. Manta's HR officer oversees process.
- Toolbox talks are now held weekly due to the increase in the number of permanent staff on farm.
- Records are maintained of toolbox topics and attendance. Topics covered include hot weather, installation of safety measures on infrastructure, farm hazards, tractor operation, safe chemical use and incident outcomes and reminders.
- Employees are all required to read and understand SOPs and be signed off on operation prior to operating machinery independently.
- Toolbox records, SOPs, training registers and incident reporting are all maintained in Donesafe.

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

Employee Induction Booklet
Labour Hire Induction Booklet
Contractor Induction Booklet
Training and Induction Procedure - Safety Framework

Auditor Notes

- Trainings on SOPs are covered during onboarding for new employees and reminders are delivered through toolboxes.
- Employees are trained on new machinery after it arrives, and training records lodged in Donesafe with all employee signatures. The farm manager is responsible for checking this information.

**FINDINGS ORGANISED BY
PERFORMANCE MEASURE**

(Continued)

- Inductions are completed with all contractors, all contractor employees have to sign in at office and be inducted before commencing work.
- Employee training such as ChemCert accreditations are logged in Donesafe and notification of when they are due for renewal is automatically generated.

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

Australia Testimonials — Leading Harvest

RRG Responsible Investment Policy

Training and Induction Procedure_Safety Framework

Auditor Notes

- RRG’s Responsible Investment Policy covers their sustainability commitment, as does the partnership with TNC. Sustainability commitments do not currently refer to Leading Harvest. Leading Harvest is referenced in RRG’s SWIF Impact Report 2024.
- The business’s engagement with LH has across several years and staff are very familiar at a corporate level. RRG have provided a testimonial to LH to the merits of LH.
- When Manta Farms was enrolled under LH, there were discussions with the farm and regional managers. The management team are very familiar with audit process as they have been through other certifications.
- The farm and regional managers were walked through the standard and meetings have been held post readiness review to review findings and actions.
- The farm management team are now very familiar with the standard and ensure LH requirements are met on the on farm level.
- LH requirements are communicated to farm staff by the farm management staff on an as needs basis (i.e. day-to-day tasks).
- Training is available on as needs basis, reference to sustainability, TNC partnership, and requirements are in onboarding packages. Toolbox session topics include; soil health, native vegetation planting care and maintenance, environmental responsibility.

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

Hort award fairwork
HR summary doc

Auditor Notes

- The HR officer is responsible for managing wages and ensuring that salaries are appropriate. Contractor wages are monitored in the sign in program, matching attendance on farm to invoices that are sent through for payment.
- The contracts of contractors / farm labour crews must be signed off to ensure they are paid appropriately.

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

RRG Labor Code of Conduct

Auditor Notes

- Records of payments and farm labour crew (FLC) policies regarding appropriate working conditions are maintained.
- The HR officer ensures contracts include appropriate working and living conditions. Visa and payslip checks are completed periodically.

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

Water use licence
Manta Farms compliance review report

Auditor Notes

- Manta Farms have hired a compliance officer who is responsible for keeping track of compliance obligations.
- The farm manager undertakes farm compliance responsibilities (meter readings etc).
- Documents are stored in the head office, and an operations folder that includes all of the information and files for Manta Farm are available on the farm.
- The Manta Farms Chief Financial Officer (CFO) is ultimately responsible for maintaining the compliance program.
- Information or updates that affect farm staff is emailed to the farm manager and is then communicated to the staff via toolboxes and followed up with signage.

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

Equal Opportunity Policy
Probation Policy
Policy and Procedure Acknowledgement
RRG Deforestation and Land Use Policy
RRG Diversity and Inclusion Policy 2020
RRG handbook_Matching Gifts Policy
RRG Labor Code of Conduct
RRG Responsible Investment Policy

Auditor Notes

- There is not a specific written compliance statement, however, compliance aspects are written into other policies.
- An Opportunity for Improvement exists to extract relevant information from existing distinct policies and developing a specific written compliance statement that conforms to the requirements of Performance Measure 11.2.

**FINDINGS ORGANISED BY
PERFORMANCE MEASURE**

(Continued)

- Compliance with Australian labour laws is ensured by processes and checked regularly by HR officer. Compliance with Australian labour laws translates to compliance with ILO laws as Australia is a founding member.

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

Manta Readiness review follow up table
Sustainable Ag Opportunities for Fifth Street
Vineyard improvement log

Auditor Notes

- Employees undergo 3, 6 and 12 month reviews depending on their position. Six month probation is included in most employees contracts. The annual review is conducted with the farm managers and any emerging issues are raised with employees on an ongoing basis or in toolboxes if applicable.
- Business review process now includes monthly reports to the Manta CEO who passes them on to RRG, as well as monthly budget actual vs projected reviews.
- A vineyard improvement log was provided outlining the continuous improvement records for all blocks in the vineyard. It is designed to document all observations, corrective actions, outcomes and planned follow-up based on the post-harvest review each year.
- Some issues identified include sunburn or weather damage, and the relevant mitigation actions to be taken before the 2026 season. Another issue identified includes over fertile vines producing too many grapes, which will be managed by following a revised pruning method for 2026 to concentrate the crop into one period.
- Information is collated on day to day basis for on farm records such as application records. Monthly operational reports are developed to inform board meetings.
- For new technology and innovation opportunities, the farm management staff utilise word of mouth from other Manta farms, and the global footprint of RRG allows for cross pollination. Cross pollination occurs between team members through business meetings, and travel opportunities for farm staff to visit other sites.
- As part of this, the farm and regional managers are going to visit farms in California shortly, and the Australian Manta CFO has recently returned from south America.
- The new weather station on farm has a rain gauge and wind monitors. It is linked to the irrigation system and it can be set up to automatically turn off the irrigation system if a threshold of rain was received.
- New soil moisture probes monitor soil temperature and moisture.
- A new variety has been chosen to replace one block which didn't suit the climate of the farm. The new variety has been chosen to fill a market gap, and to be suitable for the area.
- The annual LH audit is used as a benchmark for the business to monitor progress.

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

Management interviews

Auditor Notes

- There is no direct involvement by the on farm management team with universities or industry research organisations.
- The business is a member of the Australian Table Grape Association (ATGA), and new information is received through the association.
- A Manta Farm farm manager in SA is a representative for the ATGA in SA, which allows for efficient information spreading.
- Bloom Fresh are a newer table grape breeding company. Bloom Fresh holds half of the stock required by Manta for the vines on farm, and another company is used to keep the other half to spread risk and therefore minimise risk to the business if some of the stock is affected by disease or other possible issues.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						12.2.1

CONCLUSION

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

STANDARD USER GUIDANCE

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SPECIFIC FOCUS AREAS FOR NEXT AUDIT

Soil management, energy efficiency, greenhouse gas emissions and climate adaptation will be considered key focus areas during RRG's surveillance audit in 2026.