



# **US Agriculture, LLC**

**Carmel, Indiana**

**LEADING HARVEST FARMLAND MANAGEMENT STANDARD  
2020 SUMMARY REPORT: 2025 RECERTIFICATION**

**August 21, 2025**



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**EXECUTIVE SUMMARY**

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US Agriculture (US Ag) has performed well in demonstrating its management system’s conformance to the Leading Harvest Farmland Management Standard (LH FMS). Alignment with key priorities and objectives of Leading Harvest was demonstrated throughout the audit engagement. US Ag management staff and the tenants interviewed embrace opportunities to enhance operating efficiency, reduce potential negative environmental impacts, enhance property value, and support the adoption of appropriate technologies throughout their agricultural communities. US Ag strives to facilitate partnerships and negotiate leases that benefit its stakeholders, its tenants, local communities, and support sustainable management goals. The sites visited by auditors were professionally managed by experienced and qualified tenants with support from management staff. US Ag staff appear to be highly collaborative with their farmland operators, and communicates extensively to pursue and achieve sustainable goals, enhance farmland value, and align with stakeholder expectations.



## EXECUTIVE SUMMARY

(Continued)

## US AGRICULTURE, LLC

LH FMS AUDIT SUMMARY REPORT

### TEAM LEADER RECOMMENDATIONS

**Audit Dates:** July 31, 2025–August 21, 2025

**Corrective Action Plan(s) Accepted:** N/A

**Date:** August 21, 2025

**Follow-Up Visit Needed?** No

**Date:** August 21, 2025

**Proceed to/Continue Certification:** Yes

**Date:** August 21, 2025

**All NCR Closed:** N/A

**Date:** August 21, 2025

### AUDIT STAFF

**Lead Auditor:**

Matt Armstrong

**Audit Team Members:**

Linnea Abel

### AUDIT DETAILS

**Standard(s) Within Scope:**

**Leading Harvest Farmland Management Standard 2020**

Recertification of US Ag's management system conformance with LH FMS Objectives 1–13, Performance Measures, and Indicators.

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

**Number of Certificates:** 1

**Proposed Date for Next Audit Event:** Surveillance audits should be completed prior to August 21, 2026

**Audit Report Distribution:** kyle.maple@us-agriculture.com

## INTRODUCTION

This report summarizes the results of the 2025 audit conducted on US Ag's managed production agriculture properties. Lead Auditor for Averum, Matt Armstrong, conducted the audit. Matt Armstrong has experience with Leading Harvest throughout its development, is an assurance provider for multiple sustainability programs, and has expertise in production agriculture on multiple crop types in the United States. Site visits were conducted by Linnea Abel, Field Auditor. All senior members of the audit team hold training certificates in ISO 17021:2015 (Conformity Assessment), 14001:2015 (Environmental Management Systems), as well as IAF MD-1:2018 (Certification of Multiple Sites). Holly Salisbury independently reviewed the audit process and reports, is a certified public accountant in the state of California and has expertise on multiple crop types in the United States.

## SCOPE AND OBJECTIVE

In 2025, Averum was engaged by US Ag to perform an audit of sustainability performance on 50,000–100,000 acres of managed agricultural operations and determine conformance to the principles, objectives, performance measures, and indicators of the LH FMS 2020. LH FMS objectives 1 through 13 were covered during site visits on properties in the Lake States and Corn Belt regions. There was no substitution or modification of LH FMS performance measures.

The auditors had an opportunity to speak with the Senior Conservation Technician of Walworth County, Brian Smetana. Mr. Smetana was able to share his perspective on the impact of a recently completed improvement project on a site visited during the audit. This information further supplemented the audit and is notated within the "Findings Organized by Performance Measure" section of this audit summary report.

## COMPANY INFORMATION

US Ag is an agricultural investment firm. Farm operating tenants and management contractors are responsible for the day-to-day farmland management services for US Ag's properties. US Ag initially achieved certification for 100% of its agricultural properties in 2022, allowing it to engage in broader sampling and simplifying the process of maintaining its certification in the future.

During the audits, six (6) sites total in the Lake States and Corn Belt regions were visited. US Ag's Director of Asset Management, Managing Director, and four tenant operators were interviewed. Managers overseeing decision-making and standard compliance for sample regions were contacted for evidence requests and interviews. The properties in these regions are a representative sample of current practices in place and management decision-making. The primary agricultural production on the sites is corn, soy, and alfalfa.

**AUDIT PLAN**

An audit plan was developed and is maintained on file by Averum. An online portal was established for US Ag coordinators to upload evidence and documentation securely for auditor review, and evidence was continuously uploaded throughout the audit. An opening meeting was held on July 31, 2025, preceding site visits. Following the meeting, a document review of the provided evidence was conducted by Averum. Field sites in the Lake States and Corn Belt regions were examined on August 6 and August 7, 2025. A closing meeting was held on August 21, 2025.

**Opening Meeting: Conference Call**

July 31, 2025

**Attendees**

US Ag:

Kyle Maple

Audit Team:

Matt Armstrong, Linnea Abel

**Topics**

The following topics were discussed and presented by Lead Auditor, Matt Armstrong, 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

## INTRODUCTION

(Continued)

## US AGRICULTURE, LLC

LH FMS AUDIT SUMMARY REPORT

### Closing Meeting: Conference Call

August 21, 2025

#### Attendees

US Ag:

Kyle Maple

Audit Team:

Matt Armstrong, Linnea Abel

Leading Harvest:

Rebecca Gildiner

#### Topics

The following topics were discussed and presented by Lead Auditor, Matt Armstrong, 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

#### Audit Time

Audit Time (Days)	Activity	Responsible
.5	Opening and closing meetings	Auditor, Lead Auditor
.5	Management interview	Auditor
2	Site visits	Auditor
3	Engagement workpapers	Auditor
1.25	Evidence (document) review	Auditor
.5	Audit summary report review and certification decision	Lead Auditor

**MULTI-SITE REQUIREMENTS**

US Ag maintains operations on multiple properties in multiple regions in North America, including the Lake States and Corn Belt regions. US Ag qualifies for multi-site sampling since the properties within the management system are centrally controlled and directed by regional management, with regular monitoring activities. Regional Managers are responsible for developing corrective action plans regarding LH FMS conformance and reporting them to US Ag management. US Ag'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 requirements are provided in the LH FMS. In accordance with International Accreditation Forum Mandatory Documents (IAF MD-1:2018) methodology, all sites were initially selected at random with consideration of any preliminary examinations and then coordinated to ensure representative coverage of the complexity of the portfolio, variance in property sizes, environmental issues, geographical dispersion, and logistical feasibility.

**Sample Sites**

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**Region**

Lake States represents 12% of the acreage.

**Crop**

Corn, alfalfa

**Properties Examined During Engagement**

- Darlington Ridge
- JSP
- Delavan

**Region**

Corn Belt represents 17% of acreage.

**Crop**

Corn, soy

**Properties Examined During Engagement**

- McReynolds
- Beverage
- Stevenson



**AUDIT RESULTS**

Overall, US Ag's agricultural operations conform to the objectives of the LH FMS. Interviews and document reviews were performed to determine procedural and documentation conformance to the LH FMS. Documentation was provided to demonstrate and support conformance with LH FMS requirements. Field visits were performed on six operating sites, with three in the Lake States and three in the Corn Belt. Visits took place before or shortly after the alfalfa had been harvested. Properties growing corn were visited pre-harvest. Soil management, erosion control, and residue reuse were highlighted during site visits. Central and regional management representatives and tenants were present and interviewed to demonstrate US Ag's conformance and policy implementation. Central office staff with roles that impact LH FMS conformance were interviewed to determine awareness of and support for LH FMS conformance, and to illustrate company practices and procedures not performed by farm managers. US Ag's regional managers served as guides, were available throughout the engagement, provided logistic support, and provided responses to evidence requests.

KEY FINDINGS

FINDINGS IDENTIFIED DURING THE AUDIT	
PREVIOUS NONCONFORMANCE	Zero (0) or N/A
MAJOR NONCONFORMANCE	Zero (0) or N/A
MINOR NONCONFORMANCE	Zero (0) or N/A
OPPORTUNITIES FOR IMPROVEMENT	Three (3)
NOTABLE PRACTICES	Nine (9)

PREVIOUS NONCONFORMANCE

Not applicable

MAJOR NONCONFORMANCE

Not applicable

MINOR NONCONFORMANCE

Not applicable

OPPORTUNITIES FOR IMPROVEMENT

7.1.2 AT-RISK SPECIES

Information related to identifying and protecting relevant species such as Special Sites, Species Reports, or Species Identification Cards regarding relevant species should be shared with tenants.

7.3.2 DEFORESTATION

US Ag's commitment to zero deforestation included in its Environmental, Social, and Governance (ESG) Policy Statement could be enhanced to include additional details, such as definitions of relevant natural forest types and appropriate cutoff dates.

Distinctions of natural forest types, locations, and cut-off dates could simplify US Ag's ability to distinguish between allowable tree removal and prohibited activities.

**11.2.2 CONSISTENCY OF INTERNATIONAL LABOR ORGANIZATION (ILO) CONVENTIONS**

Aspects of ILO Conventions that are not address in U.S. Law, such as the elimination of discrimination and providing a safe working environment are addressed in US Ag's support policies.

However, US Ag could consider further aligning policy language with the ILO's 2022 amendments and addressing worker's freedom of association and the effective right to collective bargaining in working drafts of Employee Handbooks or other informative materials.

ILO Declarations could be identified in materials to simplify and clarify auditor reviews.

**NOTABLE PRACTICES****1.1.2 FARMLAND STEWARDSHIP**

US Ag makes farmland management decisions based on long-term economic productivity and increasing resource use efficiency.

Sites visited and throughout US Ag's portfolio have acreage enrolled in appropriate conservation programs, infrastructure improvements, and carefully selected tenants and cropping plans.

US Ag's staff demonstrated collaborative partnerships with tenants, local improvement associations, and other community partners to meet investor demands for long-term sustainable land management.

US Ag's exemplary commitment to communication and collaboration with operating partners, especially tenants, is supported by an effective monitoring program, clearly defined expectations, and attested to by tenants during site visits.

**2.1.2 SOIL HEALTH MONITORING**

The use of high-level grid sampling combined with CeresAI is a unique approach to central management reviews. US Ag is working with service providers to define relevant and applicable data formatting that offers compatibility with existing technologies and reporting technologies. Combined with regular soil testing, US Ag may be able to gain additional insight into the efficacy of farm management practices.

**2.2.2 DEGRADATION OF AGRICULTURAL LANDS**

US Ag participates in Conservation Reserve Program (CRP) programs in multiple regions dedicated to conservation efforts. Improvement projects are adopted with long-term productivity and efficiency in mind, such as the smoothing of swales that require additional passes for tenants and reducing erosion during heavy rainfall events.

**3.1.2 REGIONAL WATER CONSERVATION**

US Ag recently completed a significant improvement project on a sample site. The project included participation from local community partners, nonprofit organizations, neighboring properties, and the local Conservation District.

**3.2.2 WATER QUALITY PROTECTION**

A recently completed improvement project was coordinated by US Ag and involved multiple community partners. One of the main objectives of the improvement project was to reduce phosphorus levels causing excessive algae growth. Correcting for excessive algae may allow Delavan Lake to be removed from the State of Wisconsin's impaired waterways. This project is a collaborative effort to improve watershed health without sacrificing productivity.

**5.3.2 CLIMATE CHANGE ADAPTATION AND RESILIENCE**

US Ag and their tenants have demonstrated their ability to support proactive Climate Change Adaptation and Resilience on select properties in response to client requests. Case Studies on the Delevan property show an impressive ability to adapt tenant and lease requirements, on farm practices, conservation efforts, and climate change resilience when stakeholder priorities are aligned.

US Ag's oversight is based on frequent monitoring and communication with farm operators, and encourages tenant agency, participation in trials, ongoing education, and decision making with appropriate support.

**9.2.1 COMMUNITY ENGAGEMENT**

US Ag demonstrates positive and effective working relationships with tenants, neighbors, conservation districts, and nonprofits. Collaborations have resulted in a significant improvement project that is being used as a case study example for the National Association of Conservation Districts.

**10.5.1 FARM LABOR MONITORING PROGRAM**

Management Agreements include Farm Labor Contractors (FLC) checklists to support internal audits of FLC activities. Expectations in management agreements clearly delineate responsibility for ensuring worker treatment and compliance.

**12.2.1 SUPPORT FOR AGRICULTURAL RESEARCH**

A training event was held on the Delavan property for the National Association of Conservation Districts.

The improvement project was recommended for THE PROJECT of the year recognition and is an example of how effective projects can be with participation from landowners and land managers.

## KEY FINDINGS

*(Continued)*

## US AGRICULTURE, LLC

LH FMS AUDIT SUMMARY REPORT

### REVIEW OF PREVIOUS AUDIT CYCLE

US Ag initially achieved Certification to the LH FMS in 2022. During its first audit cycle, no nonconformances were identified. OFIs were addressed during subsequent audits. Throughout the various regions visited during the first audit cycle and this recertification audit, US Ag implements regionally appropriate and impactful improvement projects to maintain and enhance operational efficiency and mitigate potentially negative environmental impacts.



## FINDINGS ORGANIZED BY PERFORMANCE MEASURE

The following are summarized findings organized by LH FMS 2020 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

ESG Policy Statement and Company Commitment  
Sustainability Report  
Management Interview  
Sustainability Report  
Delavan Farm Case Study  
Tenant Questionnaires  
CRP Worksheets  
CRP Contracts

##### Auditor Notes

- US Ag maintains an ESG Policy Statement and Company Commitment. Sustainability priorities are outlined that align with responsible corporate behavior and focus on reducing negative impacts while increasing efficiency.
- US Ag's core belief in farmland investing and farmland management is to establish long-term relationships with tenants.
- Site visited had a major restoration project completed in November 2024. The restoration project included the development of a wetland at the inlet of an inland lake, with historic excess of phosphorous loading attributed to agricultural runoff. Multiple community partners and conservation agencies were involved. US Ag acquired the farm knowing there were significant opportunities for long-term productivity and profitability improvements harmonized with conservation that would benefit the community.
- US Ag intentionally finds tenants who will be making long-term decisions for the farm. Lease negotiations are tailored to meet investor needs and conservation goals without impeding the agency of tenants to make operational decisions.
- US Ag supports communication within their network, and consider itself a conduit for information. Since US Ag interacts with various farming systems with different crops, they try to share that information with all of its tenants and provide introductions within its network.
- US Ag's Regional Directors and Director of Asset Management coordinate calls between growers when they are able to leverage one another's experience regarding implementing a new practice, such as cover crops. Tenant interviewed during this year's site visit has been experimenting with cover crops. This year he was disappointed with the cover crop mix (oats and radishes) selected, and US Ag's Director of Asset Management made an introduction to another tenant who has been trialing cover crops for fifteen years, and shared success with rye cover crops.
- US Ag believes sharing information with tenants allows them to make more efficient decisions.

**Objective 1: Sustainable Agriculture Management (Continued)**

**1.1 SUSTAINABLE AGRICULTURE STEWARDSHIP**

**Auditor Notes**

- US Ag provided multiple CRP worksheets for farmland within this year's site visit sample and in regions not visited. Conservation practices include filter strips. Worksheets identify the type of cropland, associated practice, current use, and more.

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

**Objective 1: Sustainable Agriculture Management**

**1.2 CRITICAL EXTERNAL FACTORS**

**Conformance Evidence**

Draft Newsletter  
Critical External Factors Discussion

**Auditor Notes**

- US Ag monitors critical external factors and shares analyses in newsletters. US Ag provided a draft newsletter that addressed recent and relevant external factors.
- US Ag has implemented a question regarding external pressures into their general Farm Questionnaire, which they have been conducting for roughly four years.
- US Ag's Asset Management Team holds an annual critical external factor meeting to discuss factors. Meeting outcomes can affect appetites for acquisitions. Minutes were provided documenting relevant critical external factors, such as labor constraints.

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**

Nutrient Management Plans

Regenified Certificate

Lease

Haney Test

Soil Tests

CeresAI Images

Site Visit Photos

#### **Auditor Notes**

- Sites visited in the Corn Belt and Lake States regions have varying topography and are prone to erosion in some areas. Tenants interviewed have adopted minimum tillage and use no tillage as often as possible.
- Tenants use high-speed discs to chop up corn residue and expedite the breakdown of organic matter.
- Sites visited use hog and cattle manure from dairies to reduce the amount of synthetic fertilizer used. Fertilizers are applied with nitrogen stabilizers to reduce nitrogen volatilization.
- Tenants apply soil amendments such as lime to ensure appropriate soil conditions for optimum plant health.
- Leases require tenants to follow regional best management practices.
- US Ag is conducting soil sampling integrating CeresAI on ten acre grids to support high-level monitoring of soil organic matter, fertility, and soil conditions such as pH. All row crops within US Ag's portfolio were sampled this spring. CeresAI uses normalized difference vegetation index technology and supports the quantification of biomass.
- US Ag is working with their soil testing partners to obtain the data in a format that can be scaled across their portfolio.
- Tenants regularly conduct soil tests based on soil zones or grids.
- Tenant interviewed conducted a Haney test to support Regenified certification, and will test again every four years. Haney tests provide additional information compared to more common types of soil tests, including soil microbial activity.
- Tenants interviewed maintain written Nutrient Management Programs (NMPs). Programs include information for each field, historic nutrient applications, and yield records.
- Leases require tenant to provide records of crop yields, application records, and any soil or water samples conducted to the lessor annually.

**Objective 2: Soil Health and Conservation (Continued)**

**2.1 SOIL HEALTH**

**Auditor Notes**

- Crop residues are left on the soil. Cover crops are used prior to planting alfalfa, which is a four year crop. Living roots remain in the soil through the duration of alfalfa's four year productive life cycle. Alfalfa has also been shown to provide nitrogen fixation benefits, further reducing the need for additional fertilizer.

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

**Objective 2: Soil Health and Conservation**

**2.2 SOIL CONSERVATION**

**Conformance Evidence**

CRP Contracts  
CRP worksheets  
Tile Maps

**Auditor Notes**

- Deep rip tillage intermittently on areas prone to compaction. Tenants reduce tillage using no-till when they are able to and minimum till to chop residues and address areas with compaction.
- Restoration projects are present on sites. Grass waterways and prairie strips on sites visited and throughout US Ag's portfolio are conducted in partnership with the CRP.
- Tenants interviewed consider changes in topography while choosing which tillage practices to use. Areas with greater topography and rolling hills are not tilled to avoid soil disturbance that contributes to erosion.
- Leases provided for auditor review include an exhibit (Exhibit C) that represents the minimum acceptable stewardship standards to be adopted on the leased premises. Practices include cover cropping, crop rotation, and make commercially reasonable efforts to reduce frequency and intensity of tillage practices.
- Tenant interviewed achieved Regenified certification on site visited, requiring Regenerative Ag practices to be in place on site. All acres are planted with cover crops after harvest.
- Sites visited in the Lake States are leased to tenants who operate dairies as well. Tenants apply dairy manure to reduce synthetic nutrient applications and maintain manure management plans.
- Site visited had two grass waterways that were not operating efficiently. US Ag and tenant worked to restore the waterways and connect them to facilitate water runoff and reduce sediment runoff. The tenant performs necessary maintenance per the CRP contract, including reseeding the waterways with native grasses.

**FINDINGS ORGANIZED BY  
PERFORMANCE MEASURE**

(Continued)

**US AGRICULTURE, LLC**

LH FMS AUDIT SUMMARY REPORT

**Objective 2: Soil Health and Conservation (Continued)**

**2.2 SOIL CONSERVATION**

**Auditor Notes**

- US Ag provided tile maps related to a recent restoration project that incorporated new drainage tile to maximize farming efficiency and productivity while reducing sediment and nutrient runoff.

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

**Objective 3: Water Resources**

**3.1 WATER USE**

**Conformance Evidence**

Site Maps  
Sustainability Report  
Delavan Lake Improvement Association Plans  
Lease  
Delavan Case Study  
Tile Maps  
Lease

**Auditor Notes**

- Sites visited are non-irrigated and do not contribute to groundwater withdrawal.
- US Ag collaborates with multiple agencies and stakeholders to implement water conservation projects where appropriate.
- Site visited recently completed a major restoration project. The project was coordinated by US Ag's Director of Asset Management and included multiple community partners.
- US Ag provided full tile maps related to the Delavan restoration project. Tile maps and planning were adjusted during the project to accommodate additional capacity to support neighboring properties. Neighbors shared costs to offset the additional capacity where ten inch tile was needed to facilitate drainage.
- US Ag's Sustainability Report outlines a project completed in another region intended to increase water supply and reduce the potential for groundwater withdrawal. A groundwater recharge basin was constructed on a tree nut farm. US Ag supports water conservation projects and practices in regions throughout their portfolio. Tailwater recovery systems are used in the Delta.
- Leases require tenants to service and maintain irrigation equipment, which can maintain water usage efficiency.
- Leases require irrigation records to be provided annually.

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



Objective 3: Water Resources  
3.2 WATER QUALITY

Conformance Evidence  
Due Diligence Checklist  
Lease  
Delavan Case Study

- Auditor Notes
- US Ag includes water quality considerations during acquisition on irrigated farms. The due diligence checklist includes research into water quality.
  - Site visited in the Lake States is adjacent to Delavan Lake, which has elevated phosphorous levels. US Ag worked with Walworth County officials to establish a baseline nutrient measurements of runoff from the farms.
  - The Delavan improvement project is intended to reduce phosphorous loading by 40% of 2017-2021 levels, as determined by the United States Geological Survey (USGS). Baseline testing took place before project development began and resumed in 2025.
  - Leases require tenants to cultivate properties in a manner that will conserve the leases premises and keep ditches, drains, and watercourses in good order.
  - Tenant Questionnaires, completed by tenants, document water quality protection practices in place on farms. Tenants visited maintain buffers between riparian areas during operations.

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

## FINDINGS ORGANIZED BY PERFORMANCE MEASURE

(Continued)

## US AGRICULTURE, LLC

LH FMS AUDIT SUMMARY REPORT

### Objective 4: Crop Protection

#### 4.1 INTEGRATED PEST MANAGEMENT

##### Conformance Evidence

Scouting Reports

Application Records

##### Auditor Notes

- Sites visited are scouted by tenants, third-party agronomists, and Certified Crop Advisors (CCAs).
- CCAs and independent agronomists provide scouting reports to tenants. Reports include recommendations for treatment to avoid excessive crop loss and economic injury.
- Tenants maintain application records of spray activities.
- Tenants have longstanding relationships with trusted advisors and use economic thresholds, sweep counts, and weather information to determine when treatment is necessary.

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

Private Applicator License

##### Auditor Notes

- Sprays are conducted by appropriately licensed and trained individuals. Continuing education on proper use and storage of chemicals is required to maintain appropriate licensure. Private Applicator License (PAL) was verified using the state of Wisconsin's Department of Agriculture, Trade, and Consumer Protection database.
- Sites visited do not have chemical storage onsite.
- Tenant staff are trained in hazardous material handling. Training is provided prior to planting, harvest, and spray activities regarding appropriate chemical handling, storage, and the use of personal protective equipment (PPE).

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

Solar Lease  
Memorandum of Option and Easements

Auditor Notes

- Tenants interviewed use appropriate technology to conserve energy and fuel consumption.
- Tractors used by tenants have real time kinematic, GPS (global positioning system), and autosteer to support tenants’ ability to make efficient passes and reduce turns. More efficient passes and equipment features such as diesel exhaust fluid and regen cycles assist in reducing emissions.
- US Ag has made infrastructure improvements to sites visited, including the removal of fence rows that created a significant increase in the distances driven and smoothing a swale to reduce the number of turns and create more efficient passes for tractors and equipment.
- Sites visited have executed leases for renewable energy, including wind turbines and solar projects. US Ag provided copies of a solar lease and Memorandums of Options and Easements for wind projects for auditor review.

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

Lease

Auditor Notes

- Tenant interviewed uses farm equipment with timers that enable automatic shutoffs and reduce idling.
- Tenants service machinery and maintain equipment inventories. Service is conducted by in-house staff or by dealerships to ensure equipment is running efficiently.
- US Ag's lease includes expectations for tenants to manage properties efficiently, using modern methods of farming that are generally accepted in the area. Methods in use by tenants include the use of modern equipment with automation capabilities that conserve fuel consumption.
- Tenants use nitrogen stabilizers during application, which can reduce volatilization.
- Tenants use cover crops, which sequester carbon and may reduce the need for synthetic fertilizers. Tenants interviewed maintain cover as often as possible.
- Tenants interviewed have incorporated alfalfa into crop rotations, which provides continuous cover and reduces the potential for airborne dust and wind erosion.

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

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

**5.3 CLIMATE-SMART AGRICULTURE**

**Conformance Evidence**

Sustainability Report  
Delavan Case Study  
Regenified Certificate  
CRP Contracts  
CRP Worksheets  
Tenant Questionnaires  
Lease  
Lease Exhibit

**Auditor Notes**

- One of US Ag's clients, who owns Delavan and Stevens, requires that they report emissions on chemical and fertilizer use as well as fuel using their own data aggregation.
- Tenants interviewed use various practices that support farmland resiliency. Practices include the use of cover crops, minimum till and no-till, and the maintenance and improvement of grass waterways.
- Sites visited have CRP dedicated to providing habitat and filter strips for waterways and ditches.
- Standard lease language includes an expectation for tenants to use regional best management practices and operate efficiently.
- Sample lease provided includes an additional exhibit that formalizes the adoption of specific best management practices, including the use of cover crops, a minimum of a 3 crop rotation, commercially reasonable efforts to reduce overall frequency and intensity of tillage, and crop residue reuse. This is a unique addition to US Ag's leasing practices due to an investor request.
- Tenant Questionnaires collect feedback from tenants regarding practices in use and ask for feedback regarding any issues US Ag should be aware of. These questionnaires often result in capital expenditure requests related to waterway improvements and site maintenance that supports efficiency and productivity.
- Tenant Questionnaires were adapted this year to collect feedback regarding relevant areas of concern to tenants. Climate change was reflected as a relevant topic.

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



**FINDINGS ORGANIZED BY  
PERFORMANCE MEASURE**

(Continued)

**Objective 6: Waste and Material Management**

**6.1 MANAGEMENT OF WASTE AND OTHER MATERIALS**

**Conformance Evidence**

NMP

Lease

**Auditor Notes**

- Tenants who use manure on farms meet agricultural performance standards established by the state's Department of Natural Resources and maintain appropriate, written NMPs.
- US Ag sold a dairy farmer tenant 12 acres, at their request, so they could construct a manure storage facility. Increased manure storage allows the tenant to ship manure during the off-season.
- Staff is appropriately trained on the appropriate handling and storage of waste and hazardous materials.
- Leases require appropriate handling, storage, and disposal of waste, including manure management.
- Hog and cattle manure is reused after appropriate storage and management as nonsynthetic fertilizer and to build soil organic matter.
- Tenant interviewed recycles plastic sheeting for silage through a program established by the University of Wisconsin.
- Used oil is reused or given to neighboring farmers to heat shops. Used oil filters are recycled.

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

**Objective 6: Waste and Material Management**

**6.2 FOOD AND AGRICULTURAL WASTE RESOURCE RECOVERY**

**Conformance Evidence**

NMP

Sustainability Report

**Auditor Notes**

- Tenants interviewed market crops locally or reuse to feed livestock.
- US Ag worked with tenants, who are also dairy farmers, to acquire properties and develop intentional cropping plans that meet conservation and tenant goals. Tenants are able to produce high-quality feed for livestock. Dairy barns are close to or adjacent to fields, reducing shipping costs and subsequent emissions of both feed and manure.
- Monitors on harvest equipment monitor harvest efficiency and yield in real time.

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**

Phase I Environmental Site Assessments  
Special Sites and Species Report

**Auditor Notes**

- Phase I Environmental Site Assessments (ESAs) and research regarding threatened and endangered species are conducted during due diligence.
- US Ag uses information from the Fish and Wildlife Services Endangered Species and the USGS Protected Areas Database of the United States (PAD US) to compile Special Sites and Species Reports. Reports include ESA Listing Status of potential relevant species and group, such as insects, mammals, flowering plants, and more.
- Special Sites and Species Reports are not always shared with tenants.

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

**Objective 7: Conservation of Biodiversity**

**7.2 WILDLIFE HABITAT CONSERVATION**

**Conformance Evidence**

Delavan Case Study  
Due Diligence Checklist  
Special Species and Sites Reports  
CRP Contracts  
CRP Worksheets

**Auditor Notes**

- Sites visited have acreage enrolled in the USDA's CRP. Projects include native prairie strips that provide pollinator and wildlife habitat, and native grasses and forbes, grass waterways improvements, and buffer zones to stabilize soil in areas prone to erosion.
- Site visited recently had a major improvement project completed. The project was designed with input from multiple community partners and Ducks Unlimited, a nonprofit organization dedicated to wetland and grassland conservation.
- Tenants interviewed observe wildlife on sites, including rabbits, pheasants, and quail.

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

**FINDINGS ORGANIZED BY  
PERFORMANCE MEASURE**

(Continued)

**US AGRICULTURE, LLC**

LH FMS AUDIT SUMMARY REPORT

**Objective 7: Conservation of Biodiversity**

**7.3 AVOIDED CONVERSION**

**Conformance Evidence**

Site Maps  
Special Sites and Species Reports  
ESG Policy Statement and Company Commitment

**Auditor Notes**

- US Ag provided Farm Service Agency (FSA) aerial maps and records that outline farm boundaries, field identification numbers, and features.
- Special Sites and Species Reports conducted during due diligence use GIS layers to identify protected areas.
- US Ag's ESG Policy Statement and Company Commitment includes a commitment to zero deforestation in relevant natural forests or other publicly identified forest habitats. The zero deforestation commitment does not define natural forest types or cutoff dates.
- Due diligence checklists include the collection of applicable FSA records and surveys to support US Ag's understanding of a site's historical use and productivity.

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

**Objective 7: Conservation of Biodiversity**

**7.4 CROP DIVERSITY**

**Conformance Evidence**

Site Visit  
Tenant Questionnaires

**Auditor Notes**

- Tenants interviewed rotate crops and implement cover crops. Sites visited grow commodity crops: corn, soybean, and alfalfa.
- Tenants interviewed are trialing multiple types of cover crops, and include oats, peas, and rye.
- US Ag Managers collect information from tenants using Tenant Questionnaires and FSA records to understand crop plans and productivity. Questionnaires collect information on soil management. Questionnaires include checkboxes and an option for tenants to select diverse row crop rotations.

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

- Phase I ESA
- Due Diligence Checklist
- Special Sites and Species Reports
- Site Maps
- Tenant Questionnaires

Auditor Notes

- Due diligence procedures are included in the asset management procedure.
- US Ag conducts appraisals, American Land and Title Association (ALTA) surveys, and Phase I ESAs on all properties. Internal assessments special sites and species and tenant financial analysis is conducted.
- US Ag has one property in their portfolio with a special site. The special site is a singular tombstone, which is avoided.
- Due diligence checklists include Phase I ESAs for all acquisitions.
- Special Sites and Species Reports are compiled by US Ag staff using USGS PADUS data. If these reports identify special sites, further research is conducted.
- Sites visited do not have cultural or historically significant sites.

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

Objective 9: Local Communities  
9.1 ECONOMIC WELL-BEING

Conformance Evidence  
Lease  
Management Agreement

Auditor Notes

- US Ag tenants work with local suppliers and market grain locally.
- US Ag negotiated mutually beneficial lease agreements with tenants who maintain livestock operations. Tenants are able to grow animal fodder in close proximity to their operations, and US Ag is able to meet investor expectations regarding specific management practices.
- US Ag negotiated lease terms with a tenant who is also a tile contractor. Agreements were mutually beneficial to the tenant, US Ag, neighboring properties, and the surrounding community. Involved parties participated in cost sharing to maximize the positive outcomes to interested parties.
- Lease language outlines lessor obligations, including the payment of all property taxes and assessments for the leased premises.
- Management Agreement outlines expectations for all taxes or similar obligations.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						9.1.1



**Objective 9: Local Communities**  
**9.2 COMMUNITY RELATIONS**

**Conformance Evidence**  
Delavan Case Study  
Sustainability Report

**Auditor Notes**

- Community partners involved in the Delavan improvement project include the Land Use and Resource Management Department Walworth County, the Walworth County Natural Resources Conservation Service (NRCS), the Delavan lake Improvement Association, the Board of Directors and Town Chair of the town of Delavan, the USGS, the Delavan Lake Sanitary District, and neighboring farm property owners and tenants.
- Local publications recognized US Ag as a program participant in the Delavan Improvement project. US Ag was asked by Delavan Lake Improvement Association to have their logo placed on a wetland improvement project to recognize their support and partnership.
- Mr. Maple participated in an AgriNews public speaking engagement about farmland investment, related to wetland development.
- US Ag has been maintaining a blog to share sustainable farming activities.
- Darlington Ridge has a dairy day, where kids come out to the dairy. US Ag made a monetary donation to support the dairy day in 2024. Tenant interviewed hosts an annual Field Day for local fourth graders on their dairy.
- Extended US Ag team volunteered at a food bank.
- Site visit included a property that was recently split to sell 12 acres to the farm tenant, who owns a dairy. The additional 12 acres allowed the tenant to improve manure management system, including the construction of an anaerobic digester. Digesters can significantly reduce greenhouse gas emissions. Although the digester was not constructed on US Ag's property, the partnership and willingness to discuss best case scenarios for the tenant allows US Ag to make decisions that support their investors and farming partners alike.
- Tenant interviewed is a part of the Lafayette Agriculture Stewardship Alliance, which meets monthly to support protection and improvement of water quality and the environment.

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

- ESG Policy Statement and Company Commitment
- Due Diligence Checklist
- Management Interview
- Delavan Case Study
- Tile Maps
- Delavan Lake Improvement Association Plans

Auditor Notes

- US Ag's ESG Policy Statement and Company Commitment includes a commitment to recognize and protect human rights of local communities, the rights of Indigenous Peoples, and respect community's right to know.
- Due diligence checklists include the collection of applicable FSA records and an ALTA survey. ALTA has a Native American Lands Work Group dedicated to monitoring legislation, case law, and ongoing litigation to support the development of official positions regarding Native American Lands.
- Special Sites and Species Reports using USGS PADUS data may support US Ag's ability to identify relevant communities during acquisition.
- Throughout the duration of the improvement project that took place on site visited, US Ag demonstrated continued awareness and flexibility in project scope and planning to meet as many community needs as possible without sacrificing economic profitability. A farmer, who farms a neighboring property, communicated that their drainage tile did not have sufficient capacity in some areas of their farm, which led to sediment runoff and flooding that covered local roadways during heavy rainfall events. US Ag and their tenant and tile contractor worked with the neighbor to tie in their drainage tile and make adjustments to support the increased capacity to improve drainage and reduce erosion. The neighbor offset the cost of the additional improvements and the efficacy of the overall project was improved.
- Tenant interviewed stated their relationship and lease structure with US Ag allows them opportunities and the agency to innovate.

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**

Operating Policies and Procedures

**Auditor Notes**

- US Ag's Farm Management Policies and Procedures confirms management's responsibility to regularly monitor and educate operating partners on LH FMS objectives, and includes operational safety considerations.

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**

Employee Handbook

**Auditor Notes**

- US Ag's Employee Handbook contains an Equal Employment Opportunity statement.
- US Ag's Employee Handbook includes reasonable safety standard operating procedures and outlines reporting expectations regarding any unsafe condition or injury.
- The Employee Handbook includes policies to protect workplace environment. Prohibited forms of harassment are defined and include gender-based or sexual harassment. Employee conduct prohibits other activities that can threaten the workplace environment, including violence and theft.

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

American Society of Farm Managers and Rural Appraisers Accreditation  
Performance Review Template  
Operating Policies and Procedures

Auditor Notes

- US Ag hired a Chief Operating Officer in November, who oversees farm management, acquisitions, and accounting teams.
- US Ag has a Director of Asset Management, who manages properties and leads the Asset Management Department. Anything from a leasing standpoint rolls up to the Director and or Legal to ensure leasing arrangements are acceptable to all parties.
- Farm Managers and Regional Directors support property management. Farm Managers and Regional Directors are internal employees. Third-party Site Managers oversee permanent, direct operated crops and report back to local managers and or the Director to discuss farm conditions and any deviations from projects.
- US Ag staff members maintain American Society of Farm Managers and Rural Appraisers (ASFMRA) credentials.
- Tenant interviewed provides safety training regarding equipment handling and safety and tank compliance for all relevant staff, including those who support planting and harvest. Roadway safety is addressed for those who support trucking operations.

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**  
ESG Policy Statement and Company Commitment  
Management Agreement  
Operating Policies and Procedures  
Employee Handbook  
ASFMRA Accreditation

- Auditor Notes**
- US Ag maintains an ESG Policy Statement and Commitment Statement. The Policy Statement includes a commitment to LH FMS.
  - LH FMS objectives are contained within tenant leases.
  - ESG and LH FMS commitments are contained within Management Agreements used for third-party farm management.
  - US Ag Farm Management's Policies and Procedures document outlines responsibility for Farm Managers and Regional Directors. Responsibilities include educating and monitoring company operating partners regarding LH FMS objectives.
  - This year's site visit sample did not include any properties that were managed by a third-party. However, a sample management contract was provided upon auditor request. The contract states the owner's commitment to environmental sustainability, social responsibility, and effective corporate governance (ESG) and secures the acknowledgement and agreement from the third-party manager to use its best efforts to integrate and implement LH ESG objectives, included in the document.
  - US Ag maintains an Operating Policies and Procedures manual that outlines Farm Manager and Regional Director responsibilities, which include education and monitoring regarding LH FMS objectives for operating partners.
  - US Ag's Operating Policies and Procedures clearly delineates specific responsibilities for Farm Managers and Regional Directors. Site visit standard operating procedures and clearly defined expectations support training and ongoing efficacy.

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

## FINDINGS ORGANIZED BY PERFORMANCE MEASURE

(Continued)

## US AGRICULTURE, LLC

LH FMS AUDIT SUMMARY REPORT

### Objective 10: Personnel and Farm Labor

#### 10.4 COMPENSATION

##### Conformance Evidence

Management Agreement

Compensation and Benchmark Plan Review

##### Auditor Notes

- Management Agreements require the Contract Manager to obtain a copy of the lowest hourly W-2 for living wage compliance review.
- US Ag conducted a compensation review via a third party to review competitiveness of wages in 2022.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						10.4.1

### Objective 10: Personnel and Farm Labor

#### 10.5 FARM LABOR

##### Conformance Evidence

Management Agreement

FLC Checklist

##### Auditor Notes

- US Ag leverages licensed FLCs to source labor. US Ag's Managing Director states that reviews are conducted on FLCs to determine whether appropriate worker safety programs are in place.
- Management Agreements include FLC checklists to support audits of FLC activities. Checklists include living wage reviews, license provisions for pesticide applications, paid sick leave policies, provision of transportation, and more.

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

Performance Review Template

Lease

ESG Policy Statement and Company Commitment

Employee Handbook

Auditor Notes

- Registered investment advisors require Securites and Exchange Commission (SEC) compliance training. Managers participate in monthly SEC focused training exercises.
- Farm Management Policy and Procedure Manual is reviewed with the team at least annually.
- Farm visits are conducted on sites regularly throughout the growing season.
- Recently updated employee handbooks were provided for auditor review, including guidance on legal compliance and prohibited activities.
- Asset Management Team prescribes to an EOS (Entrepreneur Operating System) weekly meeting structure. Managers have the ability to bring up any issues or to-do items to ensure compliance obligations are being met. Participation is a documented expectation on US Ag's Management Review Form.
- US Ag's Employee Handbook contains compliance expectations relevant to regions and expectations regarding business ethics and conduct.
- Leases require legal compliance with all applicable federal, state, and local laws and regulations. Leases expand upon environmental regulations and pertinent agricultural considerations, including hazardous materials.
- US Ag's ESG Policy Statement and Company Commitment includes a commitment to operate in compliance with environmental regulations.

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

ESG Policy Statement and Company Commitment  
Employee Handbook  
Lease

Auditor Notes

- US Ag's ESG Policy Statement and Company Commitment includes adherence to labor and immigration laws, including prevailing wage and right to organize.
- US Ag maintains general counsel to support compliance applicable social laws and regulations.
- Leases include securing an agreement from tenants to align with LH FMS principles. Obligations are included in the lease.
- Specific ILO conventions that are not fully addressed by U.S. laws are not specifically identified in policies or handbooks, namely the freedom of association and the right to collective bargaining.
- Lease language includes a statement regarding tenants' right to quiet enjoyment of the leased premises.

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



Objective 12: Management Review and Continual Improvement

12.1 FARM REVIEW AND CONTINUAL IMPROVEMENT

Conformance Evidence

Performance Review Template  
ASFMRA Accreditation  
Regenified Certificate  
Farm Visit Records  
Sustainability Report  
Tenant Questionnaires  
Management Agreement  
Operational Policies and Procedures

Auditor Notes

- US Ag’s Asset Management Team operates under an entrepreneurial system, called L10 Meetings, which includes a quarterly feedback loop where the Managing Director provides feedback to managers, and they share feedback with him.
- The Director of Asset Management’s Performance Review Form was provided for auditor review.
- Performance Reviews are conducted for US Ag’s management staff.
- Performance Review template includes LH FMS objective understanding and improvement in sustainability.
- Tenants interviewed participate in individual trials and trials with the University of Wisconsin to support sustainable agricultural practices.
- Tenant interviewed is trialing biological menticide using treated seeds.
- US Ag management compiles information from Tenant Questionnaires and shares via US Ag’s Sustainability Reports.
- US Ag staff participate in performance reviews. Expectations regarding site visit frequency are outlined in Operational Policies and Procedures and Management Agreements.
- Farm Managers and Regional Directors maintain Farm Visit records.

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  
Regenified Certificate

Auditor Notes

- US Ag allows tenants to participate in agricultural research projects. Trials include experimentation with wholeganix (a biostimulant), seaweed products, starter fertilizers, and more.
- Tenant interviewed is trialing multiple types of biostimulants and cover crop varieties.
- Property visited has achieved Tier 2 Regenified Certification. The Tenant sells their grain to an elevator that sells Regenified certified grains. US Ag is supportive of certification efforts to determine if additional value can be realized for implementing regenerative practices.
- Tenant interviewed participates in a project annually with the University of Wisconsin, and donates a three–four acre plot to support research regarding manure management and integration of manure with crops.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
					12.2.1	

Objective 13: Tenant-Operated Operations

13.1 LEASED-LAND MANAGEMENT

Conformance Evidence

Operating Policies and Procedures

Lease

Auditor Notes

- Any leases that have been renewed since Leading Harvest enrollment have included reference points within an exhibit and acknowledgement. Darlington Ridge is a 10-year lease, which predated their enrollment.
- The tenant of the Delavan property is also the tile contractor hired to support site improvements. US Ag management and the tenant spoke nearly daily throughout the project. The tenant has been operating the property for two years.
- Regional Directors and Farm Managers usually speak with tenants monthly unless there are active projects on farms. Managers visit farms at least twice annually.
- US Ag uses CeresAI to identify potential issues on farms, such as ragweed.
- Leases include expectations for tenants to apply regional best management practices and use modern farming technology to support operational efficiency.
- Lease negotiations with tenants appear to be mutually beneficial, and have allowed tenants to secure animal fodder as well as improve manure and nutrient management programs while reducing shipping costs and subsequent emissions. Acquisition and lease negotiations resulted in multiple benefits to tenants without sacrificing productivity. Negotiations provided the capital necessary to make significant improvements to manure management programs, including construction of a biodigester and additional manure lagoons.
- US Ag management holds annual tenant meetings.
- Leases require Leading Harvest objectives, and specify expectations to provide a safe and healthy working environment, fair compensation and training for personnel, contract management company employees, and labor sourced using FLCs.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						13.1.1
						13.1.2
						13.1.3
						13.1.4

Objective 13: Tenant-Operated Operations

13.2 LEASED-LAND MONITORING

Conformance Evidence

Lease  
Farm Visit Records  
Tenant Questionnaires  
Sustainability Report  
Operating Policies and Procedures

Auditor Notes

- US Ag leases include best management practice expectations for tenants, including the provision of yield maps, crop rotations, repair and maintenance, capital expenditure, applications, irrigation, and any soil and water samples collected.
- Farm Visit records are maintained and completed after site visits or general updates to establish records of communication.
- US Ag’s Operating Policies and Procedures Manual includes expectations regarding farm visit frequency and reviews.
- US Ag creates annual Sustainability Reports that provide updates collected and compiled from Tenant Questionnaires.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						13.2.1a 13.2.1b 13.2.2

## CONCLUSION

**Results of the audit show that US Ag has a management system that continues to meet the requirements of, and is in conformance with, the LH FMS 2020. US Ag's enrolled acreage is recommended for recertification.**

## STANDARD USER GUIDANCE

### Leading Harvest Logo Usage

Program users in good standing who are enrolled in the Leading Harvest Farmland Management Program 2020 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 LH FMS 2020 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.

## SPECIFIC FOCUS AREAS FOR NEXT AUDIT

Conservation of Biodiversity will be a focus area for US Ag's first surveillance audit of their second audit cycle. This surveillance audit should be completed prior to August 21, 2026.