



International Farming

Raleigh, North Carolina

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



October 6, 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 6

 Audit Results 6

Key Findings 7

 Review of Previous Audit Cycle 9

Findings Organized by Performance Measure 10

Conclusion 44

 Standard User Guidance 44

 Specific Focus Areas for Next Audit 44

EXECUTIVE SUMMARY

International Farming John Kruse 1318 Dale Street Raleigh, NC 27605 984.260.6216 jkruse@intlfarming.com	Certification Date: October 15, 2024 Recertification Due Date: October 15, 2027 Certification ID Number: AVERUM-LHFMS-2024-0022
-------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------

International Farming (IF) has performed well in demonstrating its management system’s conformance with the Leading Harvest Farmland Management Standard (LH FMS). The property we visited was well managed by professional tenants and is supporting multiple research trials, monitored and overseen by IF. IF demonstrates an organized approach to implementing feedback from previous audit findings and using them to inform and pursue improvement opportunities. IF’s team demonstrates a thorough understanding of relevant issues and goals for the properties as well as its tenants. IF is supportive of a largescale conversion from conventional agriculture to organic farming with appropriate and frequent soil fertility monitoring requirements. Trials selected for farms appear to be intentionally targeted based on relevant areas of concern or opportunity.

EXECUTIVE SUMMARY

(Continued)

International Farming

LH FMS AUDIT SUMMARY REPORT

TEAM LEADER RECOMMENDATIONS

Audit Dates: June 25, 2025–October 6, 2025

Corrective Action Plan(s) Accepted: N/A

Date: October 6, 2025

Follow-Up Visit Needed: No

Date: October 6, 2025

Proceed to/Continue Certification: Yes

Date: October 6, 2025

All NCR Closed: N/A

Date: October 6, 2025

AUDIT STAFF

Lead Auditor:

Linnea Abel

Audit Team Members:

Matt Armstrong (Field Auditor, Audit Team Leader)

AUDIT SCOPE

Standard(s) Within Scope:

Leading Harvest Farmland Management Standard 2020

Surveillance of IF's management system of production farmland on tenant-operated properties to monitor conformance with LH FMS Objectives 1–13, and performance measures and indicators therein.

Accreditations: Approval by Leading Harvest to provide certification audits

Number of Certificates: 1

Proposed Date for Next Audit Event: IF should complete their second surveillance audit prior to October 2026.

Audit Report Distribution: jkruse@intlframing.com

INTRODUCTION

This report summarizes the results of the 2025 surveillance audit conducted on IF's managed production agriculture properties. The audit was conducted by Linnea Abel, Lead Auditor for Averum. Linnea Abel has experience with Leading Harvest, 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 Matt Armstrong, 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). The audit process and reports were independently reviewed by Holly Salisbury, who is a certified public accountant in the state of California and has expertise on multiple crop types in the United States.

SCOPE AND OBJECTIVE

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

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

COMPANY INFORMATION

IF is a privately owned institutional investment manager. Farm operating tenants and management contractors are responsible for the day-to-day farmland management services for IF's properties. IF initially achieved certification for its acreage enrolled in Leading Harvest in 2021.

During the 2025 surveillance audit, one (1) large farm in the Northern Plains region was selected, with two tenants included. 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, edible corn, beans, seed potatoes, organic corn, and organic alfalfa.

AUDIT PLAN

Averum developed an audit plan which is maintained and on file. An online portal was established by IF and coordinators provided access to the portal for auditors to facilitate document review. An opening meeting was held June 25, 2025, preceding site visits. Following the meeting, a document review of the provided evidence was conducted by Averum. Field sites in the Northern Plains were examined on July 16, 2025. A closing meeting was held October 6, 2025.

Opening Meeting: Conference Call

June 25, 2025

Attendees

IF:

John Kruse, Joy Cottongim

Audit Team:

Matt Armstrong, Linnea Abel

Topics

The following topics were discussed and presented by Lead Auditor, Linnea Abel, 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)

International Farming

LH FMS AUDIT SUMMARY REPORT

Closing Meeting: Conference Call

October 6, 2025

Attendees

IF:

John Kruse, Additional Contact

Audit Team:

Matt Armstrong, Linnea Abel

Topics

The following topics were discussed and presented by Lead Auditor, Linnea Abel, 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 (Days)	Activity	Responsible
.5	Opening and closing meetings	Auditor, Lead Auditor
.5	Management interview	Auditor
1	Site visits	Auditor
1	Engagement workpapers	Auditor
1.25	Evidence (document) review	Auditor
1.25	Audit summary report review and certification decision	Auditor, Lead Auditor

MULTI-SITE REQUIREMENTS

IF maintains operations on multiple properties across the United States. IF qualifies for multi-site sampling since the properties within the management system are centrally controlled and directed by regional management, with regular monitoring activities. IF's Agronomy and Sustainability Principal is primarily responsible for developing corrective action plans regarding LH FMS conformance with support from Regional Agronomic Account Managers. IF'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 LH FMS. In accordance with International Accreditation Forum Mandatory Documents (IAF-MD) methodology, all sites were initially selected at random with consideration of any preliminary examinations and then coordinated to ensure representative coverage of the complexity of the portfolio, variance in property sizes, environmental issues, geographical dispersion, and logistical feasibility. In 2025, a single large property with multiple tenants and parcels was selected during sample finalization due to it representing 16% of IF's total enrolled acreage and including the Northern Plains region in IF's ongoing site visits.

AUDIT RESULTS

Overall, IF's agricultural operations conform to the objectives of LH FMS. Interviews and document reviews were performed to determine procedural and documentation conformance to LH FMS. Documentation was provided to demonstrate or support conformance with LH FMS requirements. Field visits were performed on one farm in the Northern Plains. Visits took place during the growing season, so irrigation and soil management were highlighted. Central and regional management representatives and tenants were present and interviewed to demonstrate IF'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. IF's regional managers served as guides, were available throughout the engagement, provided logistical support, and provided responses to evidence requests.

Region

The Northern Plains represents 16% of all acreage.

Crop

Corn, edible corn, beans, seed potatoes, organic corn, and organic alfalfa

Properties Examined During Engagement

Averum selected a single noncontiguous property that comprises a significant portion of IF's Leading Harvest enrollment. This single site represents 100% of its enrolled acreage within the Northern Plains region.

- Great Plains Farm

KEY FINDINGS

FINDINGS IDENTIFIED DURING THE AUDIT	
PREVIOUS NONCONFORMANCE	Zero (0)
MAJOR NONCONFORMANCE	Zero (0)
MINOR NONCONFORMANCE	Zero (0)
OPPORTUNITIES FOR IMPROVEMENT	Two (2)
NOTABLE PRACTICES	Six (6)

PREVIOUS NONCONFORMANCE

Not applicable

MAJOR NONCONFORMANCE

Not applicable

MINOR NONCONFORMANCE

Not applicable

OPPORTUNITIES FOR IMPROVEMENT

3.1.1 AGRICULTURAL WATER WITHDRAWAL

Select parcels visited do not use irrigation systems with telemetry or soil moisture probes. Irrigation scheduling decisions rely heavily on scouting. IF could consider updating irrigation equipment to be compatible with remote sensing technology and support irrigation efficiency. Although research indicates the Ogallala is recharging faster under Nebraska than other areas, increasing irrigation efficiency can reduce groundwater withdrawal from sensitive areas.

10.1.1 EQUAL OPPORTUNITY EMPLOYMENT

IF’s Equal Opportunity Employer (EOE) Policy could be included in its Employee Handbook for improved accessibility.

NOTABLE PRACTICES**2.1.2 SOIL HEALTH MONITORING**

Lease provided for auditor review requires soil fertility testing every two years. The parcels were being converted from conventional to organic production systems. Frequent soil health monitoring can verify the tenability of large-scale organic farming without sacrificing soil health or degrading soil quality and fertility.

Site visited is supporting a trial for EarthOptics, which can further support soil health monitoring during an organic transition.

2.2.2 DEGRADATION OF AGRICULTURAL LAND

Tenants on organic sites apply the Biological Method, a soil management methodology that considers the long-term sustainability and profitability of the biological systems on farms. The Biological Method of farming focuses on building soil organic matter (OM) through a wide variety of strategies.

Soil analysis provided shows several fields have OM levels above 3%, which is in the ideal range of 2%–5% for sugar sand. Auditor noted visible differences in soil quality and plant vigor on site visited in comparison to other sites in the region not using the Biological Method.

5.1.1 ENERGY CONSERVATION

The Great Plains Farm has over 70 wells on the property. All wells have been converted to three-phase electric with variable frequency drives (VFDs). Power is provided by three different energy providers or co-ops. This demonstrates a commitment to conserving energy and can contribute to significant greenhouse gas reductions.

7.1.1 THREATENED AND ENDANGERED SPECIES

IF provided documentation that shows regional agronomic account managers (RAAMs) working directly with the State Game and Parks Commission's Wildlife Division to ensure species lists were current, accurate, and provided meaningful information to support management's ability to identify relevant species who have a potential for occurrence. Actionable management recommendations were included.

7.3.2 DEFORESTATION POLICY

IF's Deforestation Policy includes consideration for circumstances where forest management may be required, including consideration for forest mortality such as wildfires and pest infestations.

The policy includes a full due diligence process, continual improvement processes, and policy approval and review requirements. Clarifications for allowable tree removal increase applicability of the policy within the United States and is appropriate for global investment firms.

KEY FINDINGS

(Continued)

International Farming

LH FMS AUDIT SUMMARY REPORT

10.3.3 EMPLOYEE ROLES AND RESPONSIBILITIES FOR SUSTAINABILITY

IF's management team is comprised of individuals with diverse experience, education, qualifications, and areas of expertise. IF's management understands barriers to sustainable farming practices and can support scientific improvement recommendations and targeted research opportunities for specific farms.

REVIEW OF PREVIOUS AUDIT CYCLE

IF was initially certified in 2021. Potential minor nonconformances were identified during its Stage 1 audit (Readiness Review) that were resolved during its Stage 2 Initial Certification audit. No other nonconformances were identified in its first audit cycle or during its recertification. OFIs have been addressed or resolved.

FINDINGS ORGANIZED BY PERFORMANCE MEASURE

The following are summarized findings organized LH FMS performance measure. Specific nonconformances, OFI, and notable practices have been described in the “Key Findings” section.

Objective 1: Sustainable Agriculture Management

1.1 SUSTAINABLE AGRICULTURE STEWARDSHIP

Conformance Evidence

Sustainability Policy
Stewardship in Action 2024 Report
Lease Language
2025 Top Trials
Yield Records
Rolling Meadows Ranch Water Rights Diligence Memo
Water Stewardship Report

Auditor Notes

- IF maintains a Sustainability Policy that guides ongoing activities related to acquisition, improvement, and farmland and agricultural asset management.
- The Sustainability Policy describes how IF integrates sustainable management practices into its objectives of enhancing long-term investment performance, remaining an attractive investment partner, and enabling IF staff to fulfill their collective responsibilities to their clients, one another, and their stakeholders.
- IF uses due diligence trackers that are tailored to permanent and row crops to support due diligence procedures during acquisition.
- IF’s Stewardship in Action Report contains a written commitment to sustainable agriculture practices and outlines specific goals and actions taken to support agricultural stewardship of farmland.
- IF is a signatory of the United Nations Principles for Responsible Investing (UN PRI) to support sustainable farmland investment.
- Leases provided for auditor review contain Environmental, Social and Governance (ESG) Addendums. The addendum describes Leading Harvest initiatives and provides examples of practices that supports IF’s Responsible Stewardship Promise™, which is to “Leave the land better than we found it” Existing leases were amended to include the ESG Addendum.
- Lease language requires tenants to control soil erosion by using generally accepted soil conservation practices.
- IF develops Water Stewardship Reports to share best practices related to water stewardship. Reports address due diligence, operations, compliance, and on-farm enhancements.
- Conceptual budgets are prepared prior to purchase to support the underwriting process. IF considers the investment return, the economic health of tenants, and long-term productivity when setting budgets on properties

Objective 1: Sustainable Agriculture Management (Continued)
1.1 SUSTAINABLE AGRICULTURE STEWARDSHIP

Auditor Notes

- IF has an internal research program called “Top Trials” to evaluate new practices, products, technology, and varieties that increase yield, decrease resource use, and reduce potential negative impacts associated with agricultural operation. Successful trials are further adopted within IF’s portfolio.
- IF provided their 2025 Top Trials spreadsheet that maps planned activities to support ongoing research across IF’s portfolio.
- IF prepares Investment Committee Reports (ICRs) to communicate investment requests to the Investment Committee. ICRs summarize property characteristics, financial metrics, labor availability, soil scores, crop yields, fixed assets, and more to support long-term profitability and responsible investment.
- IF has several properties under management with conservation easements in place and uses conservation easements to strategically preserve farmland.
- IF utilizes multiple consultants on sites to assess conditions and determine opportunities for improved performance.
- IF adapts due diligence procedures to potential risks and opportunities identified in preliminary assessments. IF’s due diligence standard operating procedures (SOPs) are supported by IF staff with expertise to recognize when further diligence is required.

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

(Continued)

1.2 CRITICAL EXTERNAL FACTORS

Tenant Evaluations

- IF's Top Growers program includes a list of criteria to assist IF in identifying the most desirable tenant growers for IF properties.
- Sustainability issues are woven into the due diligence program to identify potential material issues on properties or in regions. Due diligence SOPs are tailored to row crop and permanent crop acquisitions and are supported by Due Diligence Trackers.
- IF provided a preliminary Agronomic Evaluation for the site visited, which identifies the factors most likely to challenge sustainably farming on the land. Soil quality and associated erosion risks are acknowledged and proposed mitigation efforts are included in the review.
- Farm Journals are prepared by RAAMs and identify areas of concern on each property regarding soil, water, and resource risks.
- RAAMs engage with tenants to measure awareness of critical issues facing properties and the region overall.
- RAAMs maintain Farm Journals to document site visit notes, observations, and follow-up tasks, including required maintenance.
- Capital expenditure (capex) budgets are set every year to maximize property performance while minimizing production risks. Annual fund performance is assessed annually. Tenant evaluations consider capex spending and projected capex.
- Stewardship in Action Reports reflect an institutional understanding of the critical factors that farm operators and tenants face on sites. Conservation concerns, insights, and opportunities are communicated publicly.

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

Sustainability Policy

Nutrient Mass Balance 2024–2025

Lease Language

Soil Sample Records

Soil Fertility Reports

Soil Analysis

Great Plains Agronomic Review: Organic and Conventional Inputs

Nutrient Management Plans

2025 Tissue Samples

Auditor Notes

- Soil types found in the region are primarily "sugar sand" soil types. Sugar sand is fine sandy soil prone to degradation from erosion. Soil Analysis provided shows several fields have OM levels above 3%, which is in the ideal range of 2%–5% for sugar sand.
- Service partners provide annual testing for tenants interviewed. Tenants often test more frequently than lease requirements to prepare for crop rotations. Lease provided contains an addendum with soil testing protocols. Soil testing is required every two years at a minimum.
- Site visited is part of a research trial for a biological fertilizer for organic alfalfa.
- Tenants on organic sites implement Biological Farmer methods, leveraging organic materials and regenerative farming practices to increase soil health while rebuilding soil structure and quality. Biological-focused methods heavily promote beneficial soil microorganisms and soil fungi.
- Practices on organic sites include using compost as an amendment, chicken litter, mineral fertilizers, growing alfalfa as a primary crop, and building soil via multiple biological mechanisms.
- Impacts to soil nutrient levels over time and evidence of soil management practices are measured and recorded in annual Nutrient Mass Balance reports.
- Site visited is in a Top Trials program to determine how boron applications may impact yields on organic alfalfa.
- Site visited and tenants interviewed use minimum tillage to reduce soil disturbances. Light tillage is used on organic corn acres to expedite crop residues breaking down. Moderate depth ripping is conducted on areas prone to compaction.
- Soil quality on organic sites shows remarkable improvement since implementation of the Regenerative Method, with improved OM and reduced need for additional nutrient supports. Soil appears visibly differentiated from other soil profiles in the region. Soil testing and nutrient mass balance assessments show impressive improvements since acquisition of the property.
- Tenants interviewed maintain formal soil health plans per parcel. Tenants conduct regular tissue testing on crops throughout the growing season.

Objective 2: Soil Health and Conservation (Continued)

2.1 SOIL HEALTH

Auditor Notes

- Standard soil health monitoring cycles include testing by Certified Crop Advisors (CCAs), planning for planting, planting density, amendment recommendations from qualified consultants, and the measurement of removals at harvest.
- External CCAs provide feedback on population planning on conventional sites. On organic sites, Crop Advisors from Western Sprayer follow the Biological Method and partners with Evea with long term soil health planning.
- Nutrient Management Plans (NMPs) are written and documented by consultants and farm managers. Variations to the NMP are documented. IF provided NMPs from all tenants for review.
- Soil and nutrient management on potato sites with slopes are focused to protect the "middle" elevation, due to the potential for moving irrigation water and applied nutrients. Yield on seed potatoes varies based on elevation, with the "sweet spot" middle grounds providing the most ideal yields.
- Amendments are applied via implements and pivot heads. Variable rate applications are employed on seed potato acres with the intent to regulate different elevations. Strip tillage rigs are used with variable rate applications to mitigate soil disturbance and provide precise amounts of nutrients.
- IF and the site managers rely heavily on data from soil samples, satellite imagery, and tissue samples for soil health monitoring. Diversions from the initial nutrient plans are recorded for inclusion in the following year.
- Residues are heavily utilized in field after harvest on all parcels.
- Strip tillage practices are used to minimize disruption of soil profiles on conventional sites. Tillage is minimized overall on organic sites to avoid disrupting subsurface biological, bacterial, and fungal action modes.

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

Lease Language
Sustainability Policy
Farm Tract Maps
EarthOptics Evaluation
NDVI Analysis: Time Series 2015–2025 Gordon Great Plains Farm
Soil Sample Records
Water Stewardship Reports
Stewardship in Action 2024 Report
Nutrient Management Plans
Crop Budgets

Auditor Notes

- The enhancement and maintenance of soil fertility are core requirements of the tenant's lease.
- Auditor observed hay bales positioned on field perimeters to reduce soil movement. Rye and other covers are planted during field establishment and post-harvest. Rye root structures and diking reduce water erosion on sites. No signs of irregular or undermanaged erosion were observed on sites.
- Good Agricultural Practices (GAP) Audits are conducted for potatoes, including seed potatoes. GAP Audits are required by buyers and supply chain partners.
- IF provided U.S. Department of Agriculture Farm Tract maps that appropriately depict highly erodible land designations. NMPs reflect Natural Resources Conservation Service (NRCS) requirements for acreage enrolled in NRCS.
- IF provided a comparison between 2015 and 2025 using Normalized Difference Vegetation Index (NDVI) imagery for the site visited. NDVI imagery can be an indicator of plant health and vigor.
- Site visited has field corners that are planted to native grasses.
- Tenant interviewed is strategically using alfalfa to support conversion from a conventional to an organic production system. Alfalfa supports nitrogen fixation as a legume, provides continuous groundcover to mitigate erosion, and has a productive life cycle that aligns with organic conversion requirements.
- Site visited uses cover crops including hairy vetch, rye, clover, yellow peas, oats, and wheat to preserve and enhance soil structure.
- IF's Partner in their Ag Services department prepared an evaluation of an EarthOptics trial that took place on the site visited during this audit. EarthOptics offers two particularly promising monitoring modules from IF's perspective, related to biofertility and compaction.
- Conventional tenants interviewed have been farming the land since 2011 with previous owners. IF maintained the farming relationship with these tenants due to management practices aligning with IF's culture.

Objective 2: Soil Health and Conservation (Continued)

2.2 SOIL CONSERVATION

Conformance Evidence

- Tenant interviewed applies the Biological Method of farming, a soil management methodology that considers the long-term sustainability and profitability of the biological systems on farms. The Biological Method focuses on building soil OM through a wide variety of strategies. Auditor noted desirable soil characteristics during site visit.

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

Water Quantity and Quality Investigation
Water Sample Analysis
Water Rights Diligence Memo
Water Use Reports
Total Farm Pivot and Well Data
Pivot and Well Maps
Natural Resources District Rules and Regulations
Water Stewardship Report

Auditor Notes

- Water usage in this region is unrestricted on most parcels visited during the audit. There are six parcels on the site visited with water allotments issued by the irrigation district. Water allotments have provided sufficient water for the site’s needs via careful management and banking additional water for future years.
- Water meters are installed and monitored on all pivots and parcels. Water Use Reports were provided for auditor review, as well as rules and regulations from the relevant irrigation districts that outline reporting requirements.
- On conventional sites, irrigation needs are determined with soil probes at multiple depths, shovel tests, and prior crop timing experience on the farms. Shovel tests and observations are confirmed with soil probe data prior to irrigation activities.
- Select parcels visited do not have telemetry on sites. Irrigation management relies on crop scouts to determine needs for irrigation and inform schedules.
- IF provided a Water Quality and Quantity Investigation that was conducted prior to acquisition of the site visited. Results of the investigation were shared in an ICR for the property. The site is located within the Upper Niobrara White and Middle Niobrara Natural Resources Districts (NRDs). The Mirage Flats Irrigation District, which is housed within the Upper Niobrara White NRD, supplies supplemental water to four of the pivots on five-year allotments.

Objective 3: Water Resources (Continued)

3.1 WATER USE

Auditor Notes

- An external consultant provided an analysis of water availability and quality. The Water Due Diligence Memo was provided for auditor review.
- Tenants report that the Ogallala under this portion of Nebraska is recharging at a comfortable rate and restrictions have not interfered with their operations. The ICR states the water table has been steadily rising in the area based on information provided by the U.S. Geological Service.
- Farms are located near the center of the Ogallala aquifer. Currently there are no abatements or other areas requiring special irrigation management.
- Allotments on regulated pivots do not always supply enough irrigation for an annual crop in a single crop year. Water allotments are issued every five years. Management banks excess water during years with lower irrigation needs to provide for years with higher needs. IF does not anticipate installing new wells on the site visited.
- IF provided a log of Total Farm Pivot and Well Data that includes pivot information, well registration, well depth, and capacity, and more. Some parcels are located on surface water projects through the Mirage Flats Irrigation District.
- Tenants use pivots at variable speeds and flow rates to tailor irrigation depending on crop conditions, slope, and elevation.
- Drop nozzles are used on the pivots to reduce water movement from the target area on the site.

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

(Continued)

3.2 WATER QUALITY

Waypoint Analytical - Irrigation Water

- IF provided NMPs for parcels managed by various tenants of site visited. NMPs support judicious use of fertilizers and crop protectants and can protect water quality.
- CCAs provide product recommendations and plans for applications.
- Sites visited use conservation tillage and cover crops to reduce soil disturbance and stabilize the soil, which can protect water quality.
- Nutrient Mass Balance reports track water quality and impacts of management practices on soil conditions.
- Tenant interviewed conducts weekly stem testing on potatoes and regular tissue testing on corn, beans, and alfalfa to support appropriate fertilizer use.
- Auditor observed broken hay bales on field perimeters to prevent soil erosion and water runoff. Dikes are installed to retain water on sites.
- Wells are tested regularly to determine and protect water quality conditions.
- Rows are planned and laid out perpendicular to slopes to prevent water runoff.
- Pivots and one-way valves are inspected prior to fertigation by GAP Auditors and NRD inspectors to prevent backflow and groundwater contamination.
- IF conducted a Water Quantity and Quality Investigation during due diligence that was provided for auditor review. Water samples were taken from roughly a third of the wells during due diligence.

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

Great Plains Integrated Pest Management: Organic Corn & Alfalfa

Great Plains Integrated Pest Management: Conventional Corn, Potatoes, & Beans

Auditor Notes

- IF tenants maintain NMP and Integrated Pest Management (IPM) plans specific to the properties they manage. IF provided examples of IPM plans that represent how farms would be managed if the tenants were to default on their lease.
- IF does not require IPM plans to be provided to IF for review unless there is a reason for concern, or an indication of mismanagement to protect its proprietary information.
- Tenants interviewed use biological methods of pest control in addition to the examples provided by IF in its IPM plans, such as beneficial insects and cultural methods, including planning crop rotations to reduce potential pest pressures from year to year.
- Tenants interviewed identify aphids and psyllids as primary pests of concern. Psyllids can cause greening, a primary concern on seed potatoes.
- Site visited monitors beneficial species such as lacewings and ladybugs to measure presence and populations.
- Site visited uses traps that are sent to Pest Control Advisors (PCAs). PCAs conduct trap counts and verify species to inform treatment recommendations.
- Parcels that use organic farming methods conduct weekly crop scouting. Scout uses conventional thresholds and discusses options with the tenant.
- Aerial imaging assists in informing field inspections.
- Two disease prevention treatments are applied annually on potatoes and beans. Treatments include broad vector pesticides and fungicides as a preventative treatment due to potential effects further along the supply chain.
- On organic sites, the primary strategy for pest management is to utilize natural predators and plant health itself as a preventative. Pests that are determined to need treatment are treated with Organic Materials Review Institute (OMRI) approved products
- PCAs utilize IPM disciplines and practices. Records of applications are kept for future reference and review.
- Treatments for seed potatoes are prophylactic and intended to provide broad spectrum protection. There is zero tolerance for damaged seed potato crops since they are considered waste.
- Products are applied by staff who maintain Qualified Applicator Licenses (QALs), as required by state law.
- Farm Managers on sites created a filter system to remove and prevent weed seeds from commuting onto fields via surface water.

**FINDINGS ORGANIZED BY
PERFORMANCE MEASURE**

(Continued)

Objective 4: Crop Protection (Continued)

4.1 INTEGRATED PEST MANAGEMENT

Auditor Notes

- Weed control on organic alfalfa and corn is mechanical, using mowing and weeding to physically remove weeds at a frequency and intensity that suppresses weed growth. Observations on site determined that the mechanical controls were effective.
- IPM plans are tailored to align with cropping plans. Conventional sites strive to reduce reliance on chemical and synthetic controls and organic sites aim to build resilience, enhance biodiversity, and effectively manage pest populations with minimal disruption to the agroecosystem.

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

Lease Agreements
Job Descriptions and Bios

Auditor Notes

- Site visited uses multiple modes of crop protectant application. Practices include split applications, variable rate, and broad-spectrum aerial applications. Applications are planned and conducted based on crop types, pest pressures, and economic thresholds.
- Lease agreements require compliance with all legal requirements. Compliance with the Resource Conservation and Recovery Act is specified.
- Staff tasked with product applications maintain QALs, as required by state law. Applicators follow label instructions.
- Tenant using organic production methods verifies products are OMRI approved.
- Tenants do not have any storage of crop protectants on IF property visited.

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

Renewable Energy Report: Great Plains Farm
Core Fund Renewable Energy Update
Investment Committee Report

Auditor Notes

- IF provided a Renewable Energy Report for Great Plains Farm. Key Findings of the report identify renewable energy potential and restraints, such as the property spanning three different electrical cooperatives. The report demonstrates appropriate consideration is given to the feasibility of renewable energy production on sites.
- IF prepares assessments for potential renewable generation on sites, including solar, wind, and helium production. Recommendations include required next steps and regulatory conditions that may impact renewable opportunities.
- Tenant equipment is modern and current, with Tier 4 engines, diesel exhaust fluid (DEF), global positioning system (GPS) enabled autosteer technology, and regen cycles. Efficient technologies reduce fuel consumption and emissions.
- Operators reduce fuel consumption by reducing idle times between tasks.
- Passes are reduced where possible, using programmed GPS routes and autosteer to save fuel, time, and wear and tear on equipment.
- Moisture monitors assist with reducing unnecessary irrigation events or driving to a location.
- Weed control on organic sites is extremely reliant on real time kinematic GPS and autosteer technology to physically remove weeds within one centimeter of desired plants without damaging crops.
- All wells have been converted from diesel to three phase electric power with VFDs. The site visited has a significant number of wells across all parcels and are located within three energy cooperatives.
- Some solar panels are present on sensor batteries.
- There is no renewable power generation on the sites in the current sample selections. ICR provided for the property identifies production agriculture as the highest and best use.
- IF's Core Fund maintains its engagements multiple renewable energy and carbon offset initiatives, including various multi-phase project development agreements and the evaluation of on-farm solar net energy metering.

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
Stewardship in Action 2024 Report

Auditor Notes

- IF’s Stewardship in Action Report includes emissions inventories by crop and by property. Changes in emissions between 2023 and 2024 are identified with farm-level context.
- Tenant equipment is modern and current, with Tier 4 engines, DEF, GPS/autosteer and regen cycles. Updated equipment often has higher fuel efficiency.
- Operators avoid idle time between tasks to reduce fuel consumption and reduce passes where possible, using programmed GPS routes and autosteer.
- Tenant interviewed uses moisture monitors to reduce unnecessary irrigation events or driving to pivots.
- Site practices minimum tillage. Reducing tillage saves fuel and minimizes soil disturbance, which releases carbon.
- Tenant interviewed uses its equipment dealer to provide maintenance and support optimum efficiency.
- Water trucks are used on roads during dry times to improve visibility and reduce airborne dust.

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

(Continued)

5.3 CLIMATE-SMART AGRICULTURE

Auditor Notes

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

(Continued)

6.1 MANAGEMENT OF WASTE AND OTHER MATERIALS

Great Plains Integrated Pest Management: Conventional Corn, Potatoes, and Beans

- No universal, hazardous, or solid wastes are stored on sites. IF leases forbid tenants from committing any form of waste on or to the property and require environmental compliance. Tenants may not generate, treat, store, dispose, or discharge any hazardous waste as defined in the Resource Conservation and Recovery Act.
- ESG Lease Addendums inform tenants that IF may request waste management plans at will. Leases prohibit inappropriate storage and disposal of hazardous and universal waste.
- All sites visited were clear of waste or unused products. Flat pivot tires are sequestered until they are sent for recycling or reuse.
- Tenants recycle chemical jugs and totes for reuse or returning them to the dealer. Jugs are triplerinsed and slashed prior to recycling. Chemicals are stored at tenant headquarters and shops, not on IF properties.

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

(Continued)

6.2 FOOD AND AGRICULTURAL WASTE RESOURCE RECOVERY

Great Plains Assets 2025
Nutrient Mass Balance 2024–2025
Lease Language
Insurance Records
Grain Bin and Structure List

Auditor Notes

- IF provided 2023 and 2024 yield records for the farm. Some crop loss due to weather events (hail) and weed pressures were noted. Leases contain insurance requirements, and copies of insurance policies were provided for auditor review.
- Cold storage is required for seed potatoes. Potatoes that do not meet quality requirements are used in cattle feed. Temperature controls and remote sensors on cold storage sites reduce waste by monitoring humidity, CO2, temperature, etc.
- Corn is stored in grain bins with dryers and sold as needed. Organic corn is stored in bins with clean out procedures for organic products. Organic alfalfa is baled for storage.
- Beans are shipped directly to elevators. Beans are stored in bins with ladders to prevent splitting and damage to harvested crops.
- IF provided a list of structures, including grain bins and available storage for the property. Multiple bins are available for grain producers.
- Tenants reuse residues from prior crops by leaving them in fields and discing them into soil profiles.
- Tenant using organic production methods uses compost, chicken litter, and dried manure extensively to provide nutrition on organic sites. Compost and manure usage provides improvements to soil structure and has contributed to the soil regeneration on organic sites.
- Impacts from resource reuse practices are measured and reported in Nutrient Mass Balance records.
- Improved soil structures promote bacterial and fungal performance as well as improved water infiltration. Organic matter from compost remains on site longer than applied fertilizer.
- Tillage is minimized or eliminated on site, depending on days. Residue is left on sites for future OM sources and soil structuring.

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

Sustainability Policy
Eco-Summary Assessments
Eco-Summary Farm Review
Endangered and Threatened Species Maps
Stewardship in Action 2024 Report
Preliminary Agronomic Evaluation
Farm Surveys - Sheridan, Dawes, and Cherry Counties
Eco-Cultural Assessment
Due Diligence Trackers
Parcel Maps

Auditor Notes

- IF's Sustainability Policy states the protection of ecosystem biodiversity is a key sustainability focus area.
- IF provided Eco-Summary Assessments that identify the potential presence of any threatened, endangered, at-risk, and rare species on or near properties. IF maintains maps of potentially relevant species of fish, insects, mammals, and plants.
- IF provided an email exchange between the state Game and Parks Commission and an IF RAAM. The Assistant Wildlife Division Administrator reviewed and updated the species lists used by IF during due diligence. The administrator provided reviews and added additional relevant species and context to the list to support due diligence and farmland management practices.
- Tenants on sites are made aware of potential special status species with occurrences in the area of the farms.
- Based on the assessment data from U.S. Fish and Wildlife Service (USFWS), there are no critical areas adjacent to or in the vicinity of the sites visited.
- IF identified four relevant species of concern that may exist in the area of the farm visited: Northern Long-eared Bat, Swift Fox, Northern Redbelly Dace, and Finescale Dace. Further assessments by conservation researchers assessed that the likelihood of threatened and endangered species frequenting the areas of the sample properties is small.
- IF uses due diligence checklists to review environmental aspects of property acquisition. Eco-Summary Assessments support environmental research. Environmental areas of due diligence trackers could be expanded to reflect ecological due diligence, including relevant species identification.
- Due diligence providers coordinate with various environmental and conservation resources, including the State Departments of Fish and Wildlife, USFWS, and the National Wetlands Inventory that may alert IF to the presence of special status species.

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

(Continued)

7.2 WILDLIFE HABITAT CONSERVATION

Farm Surveys

- Water and wetland assessments determined that the waterways in the vicinity of the Great Plains Farm could be classified as Waters of the United States (WOTUS) and would fall under Clean Waters Act (CWA) protections. IF conservatively considers waterways on and near sites WOTUS and maintains water quality protection.
- No other Native Habitats or Natural Communities were identified on the sites.
- IF uses Farm Tract Maps that delineate cropland, Conservation Reserve Program cropland, and other identifiers such as wetland determinations. No ecologically important sites were identified on the sites.
- Corners are left fallow for native grasses and are used by wildlife and pollinators.
- Tenant interviewed has developed a Biodiversity Enhancement Plan with assistance from a third party.
- Third-party assessments for IF determined that the Great Plains Farm presented opportunities for the Agricultural Conservation Easement Program (ACEP). IF has not yet engaged with the ACEP due to the development and subdivision of the farm required to engage with the program.

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

(Continued)

7.3 AVOIDED CONVERSION

- 2025 Deforestation Policy
- Eco-Cultural Assessment
- Due Diligence Trackers
- Parcel Maps
- Sustainability Policy
- Stewardship in Action 2024 Report
- Leading Harvest 2025 Progress Update
- Preliminary Agronomic Evaluation
- Farm Surveys

Auditor Notes

- IF's Deforestation Policy has been completed and updated as of 2025. The policy includes regions of application, natural forest types, and cut-off dates.
- IF's Deforestation Policy includes extenuating circumstances where forest management may be required, a full due diligence process, continual improvement processes, and policy approval and review requirements.
- Site visited has been long-term farmland. Pivots have been established long-term, with some approaching 30 years old. Corners of irrigated pivots are left native for wildlife and pollinator usage.
- IF is committed to avoid the purchase of any properties that have not been prior classified as production farmland or have natural forests present.
- IF cartographers digitize aerial photos and overlay with Farm Service Agency maps to confirm which tracts of land are production farmland.
- Due Diligence Checklists are used to confirm title work and identification of properties. Farm surveys and summaries were presented for auditor review.
- A commitment to biodiversity and limiting negative impacts on the natural resources of a property is included in IF's stewardship policies and reporting.
- Pre-acquisition Environmental Assessments confirm that the property has not been converted from natural forest post-deforestation cut-off date(s). Internal research and reviews included senior leadership.
- Land Use documentation and history is verified prior to purchase to further ensure that land was not converted from natural forest post-deforestation cut-off date(s).
- Periodic remote sensing and satellite imaging analyses contribute to ongoing land use monitoring to detect any signs of land clearing or deforestation activities.

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

Objective 7: Conservation of Biodiversity
7.4 CROP DIVERSITY

Conformance Evidence

Annual Crop Budgets
Hyder Valley Fiber Statement for Leading Harvest Audit - June 2025
FSA-156EZ

Auditor Notes

- Abbreviated Farm Records (FSA-156EZs) document crop types and planted acres.
- Rotations on conventional sites are typically corn, corn, potato, beans; rotations support following crops with residual nutrition. Beans provide approximately 30 pounds of nitrogen for the following crop. Conventional sites are incorporating rye cover crops.
- Organic sites rotate alfalfa and corn, with occasional alternate crops and a diverse cover crop mix. As a legume, alfalfa affixes nitrogen on sites and provides a cover crop-like benefit to soil structures with its deep root systems.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						7.4.1

Objective 8: Protection of Special Sites
8.1 SITE PROTECTION

Conformance Evidence

Due Diligence Trackers
Phase I Environmental Site Assessment
Parcel Maps
Great Plains - Grain Bin and Structure List
Eco-Cultural Assessment
Farm Service Agency Records and Maps
Encroachment License Agreement

Auditor Notes

- IF documents due diligence procedures in its Due Diligence Trackers. Trackers include research including surveys, mapping, assessments, and compilation of property records that would support identification of special sites.
- Phase I and II Environmental Site Assessments (ESAs) are included in Due Diligence Trackers. Phase I ESA was provided for auditor review. Historic land use research is reflected in the ESA.
- Ecocultural Sensitivity and WOTUS reviews are included in Eco-Summary assessments.
- IF conducted water and wetland assessments and determined that the waterways in the vicinity of the Great Plains Farm could be classified WOTUS and would be subject to CWA protections. IF conservatively considers waterways on and near WOTUS sites and maintains water quality protection as described in Objective 3.
- IF provided an Eco-Cultural Assessment for the farm visited that referenced the National Register of Historic Places to identify sites of cultural or historic significance and requested an Archaeological Records Search from the state of Nebraska.
- Rolling Meadows Ranch (the prior operating name for Great Plains Farm) maintained an Encroachment License Agreement with the Nebraska Game and Parks Commission (NGPC) to permit Rolling Meadows to operate within the original railroad right-of-way and areas identified in the Trails Act of 1983. The agreement maintains that the NGPC may reopen the trail and require the removal of buildings and infrastructure.

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

FINDINGS ORGANIZED BY PERFORMANCE MEASURE

(Continued)

International Farming

LH FMS AUDIT SUMMARY REPORT

Objective 9: Local Communities

9.1 ECONOMIC WELL-BEING

Conformance Evidence

Property Tax Documentation

Auditor Notes

- IF provided tax documentation including withholding information, tax assessments, and historic property taxes.
- Tenants source products and supplies from local suppliers. Implements are purchased exclusively from local dealers.
- Tenants interviewed employ full-time employees from local communities.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						9.1.1

Objective 9: Local Communities

9.2 COMMUNITY RELATIONS

Conformance Evidence

Stewardship in Action Report

Community Engagement- (Tenant)

Auditor Notes

- Staff at conventional tenants engage with the local community as coaches, local emergency medical technicians and firefighters, local 4-H partnerships, sponsors of baseball and football teams, Future Farmers of America involvement, hosting interns, meetings with corporate customers, Women in Ag, and other groups.
- Labor management staff have hosted webinars for national H2A committees.
- Staff at organic tenants provide 4-H donations, rodeo sponsorships, fire department donations, library donations. Attempts have been made to present at local universities. The current tenant has partnered with other universities on carbon research and other projects.
- IF conducts a community partnerships assessment to research philanthropic donations and other ways to partner with agriculture organizations that support local communities.
- IF management engages with multiple water conservation districts in the regions of the core fund properties.
- IF's Stewardship Reports outline several community alliances. Ally organizations focus on food security, accessibility to healthy foods, waste reduction, agricultural apprenticeship for military veterans, Indigenous environmentalism, and more. In North Carolina, where IF is headquartered, IF supports and sponsors local pay-what-you-can cafes, the American Red Cross, and Bee Downtown.

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

- Sustainability Policy
- Stewardship in Action Report
- Eco-Cultural Assessment
- Phase I Environmental Site Assessment
- Due Diligence Trackers
- ALTA Loan Policy of Title Insurance (Sch BI and BII)
- Fleet Vehicles
- On-Site Signage

Auditor Notes

- IF’s Sustainability Policy contains a commitment to support the economic resilience of local communities and recognize distinct legal rights and cultural interests of Indigenous Peoples. IF considers potential impacts its activities may have on these and other stakeholders.
- IF provided an Eco-Cultural Assessment conducted during due diligence.
- FSA records support due diligence processes, which include title research, surveys, and reviewing delineation maps.
- Contact information is available online. Property information is available via public records.
- The Pine Ridge Reservation (Lakota: Wazi Ahán̄haŋ Oyán̄ke) is located nearby in the region of Rushville. Tenants have partnered with organizations that employ Indigenous Peoples with the stated goal of improving worker livelihood and increasing job opportunities for the local Indigenous Population.
- Tenants have presences on social media, and their long tenure on the properties allows community members to identify tenants.
- Fleet vehicles have company identification on them. Calls and messages go to the office, and requests or concerns are tasked to appropriate personnel.
- Fields have farm signs identifying management on each parcel. Organic tenants maintain an office and storefront in downtown Rushville.

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

FINDINGS ORGANIZED BY PERFORMANCE MEASURE

(Continued)

International Farming

LH FMS AUDIT SUMMARY REPORT

Objective 9: Local Communities

9.4 PUBLIC HEALTH

Conformance Evidence

On-Site Signage

Auditor Notes

- Weather and wind are taken into consideration during planning, with spray planning software (Driftwatch) used by tenants and spray crews.
- Label directions on products are strictly followed.
- Staff are trained on safe operations, with refresher sessions prior to application activities.
- On organic sites, signage is posted to prevent entry to sites and spraying at farm entrances. Signage on fence posts at entry points to organic sites label the field as organic. Conventional tenants are developing informational signage for spray events.
- Tenants require drug testing for all employees and have a zero-tolerance policy for driving under the influence (DUI) incidents.
- Third-party sprayers are appropriately licensed and trained in proper product usage.

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

Leading Harvest Progress

Equal Employment Opportunity and Diversity Policy

Respectful Workplace Training

Employee Handbook

Auditor Notes

- IF is an Equal Opportunity Employer and has an Equal Employment Opportunity and Diversity Policy. The Policy could be included in IF's Employee Handbook to remain accessible.
- Tenants interviewed include EOE statements with posted job opportunities.
- Employment agreements require employees to support and maintain a safe, gender equitable, and professional work environment.
- IF requires annual mandatory anti-harassment, respectful workplace, and security training.

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

(Continued)

10.2 OCCUPATIONAL TRAINING

Employee Handbook

- IF's Sustainability Policy emphasizes the development and retention of skilled individuals and the importance of continual learning and improvement.
- ESG Lease Addendums have a written statement of expectation that tenants maintain records addressing occupational health and safety.
- The Leading Harvest Progress Update states that tenants have written records of personnel and contract worker training, including posted signage related to pesticide handling.
- IF's Employee Handbook has an appendix that describes its commitment to ongoing education and training.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						10.2.1

(Continued)

10.3 SUPPORTING CAPACITY FOR SUSTAINABILITY

Sustainability Policy
Job Descriptions and Bios
Employee Handbook
Lease Language

Auditor Notes

- Leading Harvest commitments are included in IF leases and IF's Stewardship Report. The Stewardship Report, and included commitments, have been distributed throughout the organization and made public where appropriate.
- IF has designated individuals to support Leading Harvest conformance. IF's Principal of Agronomy and Sustainability has defined responsibilities to support LH FMS objectives.
- IF has an Agronomy Department that focuses on soil fertility solutions and innovation. Staff are highly qualified to use data to support decisions that may help IF balance economic productivity with soil conservation.
- Resources and staffing decisions have been made at IF to assign individuals and groups to specified and explicitly stated aspects of LH FMS.
- Descriptions of roles and people assigned to tasks have been given to responsible parties. Extensive institutional knowledge is present on IF teams and in leadership. Staff from IF's Ag Services and Agronomy teams hold advanced degrees and multiple certifications that support their ability to guide farmland management decisions sustainably.
- IF's Sustainability Policy outlines its intent to employ professionals with specific sustainability expertise.
- IF requires annual training, including ongoing legal compliance, sustainability, and conservation topics.
- IF holds Quarterly Nexus Meetings to update multiple teams across the company.
- ESG briefs and letters reporting IF's progress and findings in the field have been published and shared publicly. Responsible Stewardship Reports are shared within the company for sharing news and emergent topics.
- The consideration of sustainability issues is addressed in responses to potential investor requests for proposals including questions regarding sustainability.
- IF's management team is comprised of individuals with diverse experience, education, qualifications, and areas of expertise. Combined, IF's management understands barriers to sustainable farming practices and have the ability to support scientific improvement recommendations and targeted research opportunities for specific farms.

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

Objective 10: Personnel and Farm Labor

10.4 COMPENSATION

Conformance Evidence

Management Interview

Auditor Notes

- IF conducted a compensation assessment with a third party to support the development and implementation of a comprehensive compensation structure.
- Compensation has been adjusted in the past where warranted to achieve alignment within and across varying levels of responsibilities.

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

Insurance Policies and Certificates

American Land Title Association Loan Policy of Title Insurance (Sch BI and BII)

Auditor Notes

- No farm labor contractors are utilized on the Great Plains Farm sites or by tenants.
- H2A labor is used during harvest and shipping of seed potatoes. Dedicated staff are tasked with overseeing the administration of the program. Management staff report challenges with securing returning trained labor, but no issues maintaining compliance with applicable labor laws or regulations.

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

2025 - Quarterly Network Security and Phishing Training
International Farming 2024 Securities and Exchange Commission Marketing Training
Employee Handbook
Insurance Policies and Certificates
Investment Committee Report
Real Estate Investment Trust Records
Due Diligence Trackers

Auditor Notes

- IF has legal counsel on staff and an in-house compliance officer who serves as the Chief Commercial Officer (CCO).
- IF requires appropriate insurance to be maintained by tenants. Records were provided for auditor review.
- IF uses internal communications to remain up to date on time-sensitive regulatory updates.
- IF is a UN PRI signatory. UN PRI aligns with core International Labour Organization conventions.
- IF is compliant with Security and Exchange Commission (SEC) compliance requirements and conducts annual compliance training.
- Third parties are utilized for legal reviews on contracting and lease agreements as needed.
- Occupational Safety and Health Administration (OSHA) and labor rights posters are posted in common areas and shops on sites visited.
- Due diligence procedures indicate IF conducts thorough research to understand property characteristics and comply with regulatory requirements, including water rights. Investment recommendations are supported by ICRs and Real Estate Investment Trust.
- Safety Data Sheet binders are available at tenant storage sites.
- IF maintains a compliance culture, with its CCO also acting as an internal compliance officer.

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

Employee Handbook
Sustainability Policy
Respectful Workplace Training
Lease Agreements
Insurance Policies and Certificates
Stewardship in Action

Auditor Notes

- IF’s Employee Handbook includes compliance expectations for social laws. IF conducts training to support a respectful workplace. Training covers anti-discrimination, bullying, and anti-harassment.
- IF’s Sustainability Policy mentions fair, respectful, and inclusive labor practices, and considers them a key focus area of its sustainability strategy.
- IF’s Sustainability Policy contains a commitment to support the economic resilience of local communities and recognize distinct legal rights and cultural interests of Indigenous Peoples.
- OSHA and Workers Rights informational posters are posted in common areas in offices and on farm properties.
- IF’s Employee Handbook states, "we all have the responsibility to maintain a safe and efficient working environment," and outlines the company’s commitment to following guidelines related to maintaining a legally compliant workplace.
- Legal compliance for workforce regulations and SEC compliance covers International Labor Organization (ILO) principles to the extent of U.S. law.
- IF is a signatory of the UN PRI. The UN PRI references and aligns with core ILO conventions. UN PRI recognition is included in its Stewardship Report.
- Lease language clarifies tenant rights and landlord rights. Tenants are at liberty to operate farm properties as they see fit within the requirements of their lease agreement with IF. IF’s right of entry in lease language is reasonable.

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

(Continued)

12.1 FARM REVIEW AND CONTINUAL IMPROVEMENT

Employee Handbook
Stewardship in Action 2024 Report
Ag Services Report
International Farming Leading Harvest 2025 Progress Update
Yield Records

- IF conducts annual reviews and prepares reports for each property, with current results compared against stated goals for the property. The performance review process is outlined in the Employee Handbook.
- Monthly budget tracking and capital expenditure meetings are conducted to address emerging issues and opportunities.
- IF's Asset Management Committee makes final decisions regarding capital expenditure on sites. Documentation and reporting regarding potential submittals are extensively reviewed in committees that span all divisions of executive leadership.
- Leading Harvest Progress Trackers are prepared to track activities, results, or adjustments made in relation to previously identified opportunities for improvement.
- IF management uses data from monitoring systems to inform and educate growers during regular meetings, capital expenditure conversations, and for Top Trials Program implementation. RAAMs assist with the Top Trials Program coordination and implementation.
- Results from top trials and research are written up in reports and published for both internal and external communications.
- IF has a Research and Development Committee that vets new projects and opportunities to ensure projects are valuable.
- RAAMs interact with growers at least monthly, especially during harvest season. Formal reviews are conducted at least annually to review leases, capital expenditures, and business plans with growers.
- IF's Stewardship Report includes descriptions of projects that evaluate conservation and practice improvement opportunities.
- IF considers agricultural innovation a strategic initiative and supports several research projects with the potential to increase environmental stewardship across multiple crop types.
- IF leadership attends Leading Harvest summits and IF's President presented the keynote speech at the most recent Leading Harvest summit. IF participates in research white papers in partnership with Leading Harvest staff.

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

(Continued)

12.2 SUPPORT FOR SUSTAINABLE AGRICULTURE

2025 Field Trials Detailed Summary

- IF's Ag Services team tracks progress on activities throughout the year. Tasks focus on asset financial performance, identifying positive return on investment potential for Top Trials program, regenerative agriculture opportunities, Leading Harvest activities, and more. Top Trials is IF's internal research program.
- The IF Agronomy Department manages Top Trials Program with the aim of solving a specific issue or introducing a new technology.
- The Stewardship in Action Report shares information on IF's Top Trials Program with external stakeholders.
- The site visited during this year's surveillance audit is supporting multiple Top Trials. Trials include biological product usage and sensor-based irrigation.
- IF sites have dedicated hundreds of acres to support agricultural research. Four current trials are taking place on the site visited during surveillance. The trials focus on increasing yields and nutrient use efficiency. Trials include:
 - Highly water-soluble boron: Micronutrient response
 - EarthOptics: Soil mapping
 - Sarga Seaweed Extract: Increasing yield without additional fertilizer application
 - Utrisha: Increasing yield without additional fertilizer application
- IF sites across its enrollment are supporting research plots or trials for new technology.

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

Lease Language
Environmental, Social, and Governance Addendums
Responsible Stewardship Addendum
Farm Journals
Tenant Credit Reviews
Schedule of Loans
AgCountry Letter of Good Standing
International Farming Sustainability Policy
Responsible Stewardship Lease Amendments and Addendums

Auditor Notes

- ESG lease Addendums share information regarding LH FMS and regional best management practices (BMPs). The Addendum states IF’s intent to engage with tenants who implement practices that conform with the requirements of LH FMS. ESG addendum has recently been revised to be the Responsible Stewardship Addendum.
- Responsible Stewardship Addendums are issued to tenants in addition to standard operating leases. Written agreements with farmland tenants committing to regional BMPs and sustainable agriculture goals are reflected in lease addendums.
- Leases state tenant requirements for insurance coverage, including workers’ compensation and compliance with all applicable laws and regulations, including safety requirements.
- Farming practices by tenants are included in reviews by Tenant Managers. Feedback and guidance from IF management is provided while avoiding instructing tenants how to operate on sites and conflicting with tenants’ quiet enjoyment of the property.
- IF provided documentation that illustrates rigorous tenant reviews prior to lease execution. Financial reviews support IF’s ability to allow tenants the freedom to explore new farming methods while mitigating risk exposure.

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

Ag Services Report

Great Plains Agronomic Review: Organic and Conventional Inputs

Crop Budgets

Yield Records

Farm Journals

Auditor Notes

- Tenants are selectively chosen for professionalism and innovative behaviors. IF's Compliance Committee reviews insurance, financial statements, and farm data, including soil tests, crop performance, and water quality tests.
- IF management monitors agricultural practices through annual reviews and regular visits and calls with tenants. RAAMs meet with tenants at minimum once per quarter and usually twice per quarter for the Great Plains Farm.
- RAAMs discuss current events and needs, capital expenditure requests, and site improvements during farm visits. Tenant management meets with the tenants multiple times a year and visits farms when they are in the area.
- RAAMs are familiar with the in-field production practices and conservation practices used by tenants to ensure they are aligned with regional BMPs. Water allocations and usage are provided to tenant management for review.
- Property visit notes within Farm Journals provided indicate visits have a structured process for monitoring agricultural practices, compliance, and necessary site maintenance, and are intended to address potential issues. Farm Journals are prepared by RAAMs to document site visits.
- IF reviews current and historic performance of all aspects of land management during the annual tenant review process. Financial and ground operations are included in annual reviews.
- Farm management practices are coordinated with tenants from the beginning of the season. Capex needs are captured early in the growing cycle so IF management can support tenants.
- IF's Asset Management Committee oversees tenant requests, provides analysis on an asset's contribution to overall sustainability goals, and provides approval to appropriate tenant requests for capex.
- Reviews are conducted via phone calls and visits and reinforced with annual NRD documentation.
- Farm reports are "live documents" and are considered an ongoing assessment. Reports are constantly reviewed and revised throughout the year.
- Farm reports have been made more specific over time, and more questions and documentation have been added.
- Reporting and notes from farm visits are recorded in Farm Advisor software in addition to visual information provided by satellites and drones and conservation opportunities.

Objective 13: Tenant-Operated Operations (Continued)

13.2 LEASED-LAND MONITORING

Auditor Notes

- IF managers react in a timely manner to changing situations and assist tenants with locating consultants and experts to address farm needs when necessary.
- IF’s Asset Management Committee includes representatives from farm management, agronomy, investor relations, including sustainability leadership, and finance to review the leasing procedure and content. The committee meets monthly and as needed.

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 IF has a management system that continues to meet the requirements of, and is in conformance with, LH FMS 2020. IF's enrolled acreage is recommended for continued certification.

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 its 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

Water use efficiency and improvement of the verifiable monitoring system will be key focus areas for IF's second surveillance audit of this audit cycle.