

ARGYLE STEWARDSHIP REPORT

Responsible Investment in Australian Water Entitlements

About Argyle and our Stewardship Philosophy

Argyle invests in Australian water entitlements (water rights) with a long-term, stewardship-led approach.

We recognise that water is a finite, shared, and highly regulated resource that underpins environmental health, regional communities, and food and fibre production.

Our stewardship approach is grounded in the belief that well-governed, transparent 'cap and trade' water markets and limits to consumptive water use support long-term sustainability of river systems, their natural environments, high value food and fibre production and strong regional economies.

Argyle is not presently engaged in investments or operations of irrigation farms. Argyle does not directly extract or use water in its own right. Our influence is exercised through how we acquire, hold, lease and sell water allocations derived from our water entitlement portfolios each year.

Argyle engages constructively with regulators, market participants, and communities consistent with the objectives of Australia's National Water Initiative (2004) and its pending successor, the National Water Agreement (NWA), such that scarce consumptive water is able to be transacted to its highest and best use.

Scope of this Stewardship Report

This report describes Argyle's stewardship activities relating to:

- Water entitlement holdings within the Murray–Darling Basin; and
- Engagement with regulators, market operators, and industry stakeholders.

Unless otherwise stated, this report covers activities during the most recent calendar year and reflects Argyle's current stewardship practices.

Argyle focuses on:

- **Compliance**
Ensuring all water holdings, allocations, carryover and trades comply with state and Commonwealth rules.
- **Market integrity**
Participating in water markets in a transparent and orderly manner, using a full range of market mechanisms including by offering through authorised exchanges and water brokers.
- **Responsible market participation**
Allocating water sales to productive and compliant water users, and taking into consideration the uncertainty of future seasonal conditions and possible downstream impacts of trade volumes.

Argyle does not engage in purchasing water allocations for the purposes of speculative financial gains. Argyle's water entitlement portfolios are allocated water progressively each year. Argyle confines its activities to selling down its water allocation position throughout each year with the aim of optimising sales revenues. It does not engage in buying water allocations with the objective to profiteer from seasonal water scarcity.

Argyle will purchase water allocations from time to time but only when there is an abundance of supply (and prices are cheap) for the purpose of carrying that water over to a future Water Year when it may not be as abundant.

- **Monitoring policy developments**
Actively monitoring Basin Plan implementation, water recovery programs, and rule changes that may affect market stability or environmental outcomes.

Engagement with Industry and Regulators

During the reporting period, Argyle engaged with various industry groups and regulatory bodies, including:

- National Irrigators' Council;
- Australian Water Brokers Association;
- Murray Darling Basin Authority directly, and consultation forums;
- Department of Climate Change, Energy, Environment and Water; and
- Commonwealth Environmental Water Holder.

These engagements focused on improving market clarity, operational efficiency, and long-term confidence in water markets.

Environmental Stewardship

Argyle supports the objectives of the Murray–Darling Basin Plan, including restoring river health while supporting sustainable economic activity.

Our environmental approach includes:

- Investing only within Sustainable Diversion Limit (SDL) frameworks;
- Not seeking to undermine environmental water recovery targets; and
- Supporting data-driven and science-based water policy.

Argyle does not engage in speculative behaviour intended to exacerbate scarcity or disrupt environmental outcomes.

Transparency and Reporting

Argyle is committed to transparency appropriate to its role and stakeholder expectations.

This includes:

- Public disclosure of our stewardship approach;
- Ongoing review of reporting practices; and
- Willingness to engage with stakeholders and regulators on stewardship matters.

This Stewardship Report will be reviewed annually and updated as Argyle's portfolio and activities evolve.

Stewardship Activities undertaken during the year ended 31 December 2025

Date	Activity	General Topic
25-Mar-25	DCCEEW Water Market Intermediaries Code	Intermediaries Code
26-Mar-25	Australian Water Brokers Association Meeting	General Meeting
30-Mar-25	National Irrigators Council General Meeting	General Meeting
16-Jul-25	Murray Darling Basin Authority Agribusiness Leaders meeting	Basin Plan
17-Jul-25	National Irrigators Council General Meeting	General Meeting
29-Jul-25	Murray Darling Basin Authority River Reflections conference	Basin Plan
18-Sep-25	ACCC Water Market Intermediaries Code	Intermediaries Code
01-Oct-25	Murray Darling Association Conference	General Meeting
02-Oct-25	National Irrigators Council General Meeting	General Meeting
30-Oct-25	Presentation on water markets information – Department of Climate Change, Energy, the Environment and Water	Water markets
11-Nov-25	Murray Darling Basin Authority Leaders Forum	Basin Plan
12-Nov-25	Murray Darling Basin Authority Leaders Forum: led discussion on water market solutions to env. water needs	Basin Plan
30-Nov-25	Meetings and paper re: Water market solutions to environmental water needs	Basin Plan
09-Dec-25	Basin Plan Implementation Webinar	Basin Plan