

- Never operate Company machinery or vehicles while intoxicated or taking medications that impair your judgment.
- Never tamper with or use equipment in an unauthorized manner.
- Employees may not chew gum or eat candy or food while working in production.
- Employees working in production must wear a hairnet, gloves, proper boots, a clean apron, and any other clothing that the Company deems to be appropriate at all times.

Employees can prevent accidents and contribute to a safe work environment by carefully examining their equipment to see if it in good working order on a routine basis, and report any needed repairs.

### **REPORTING AN INJURY**

Employees are required to report any injury, accident, or safety hazard immediately to the Director of Operations. Minor cuts or abrasions must be treated on the spot. More serious injuries or accidents will be treated accordingly. Serious injuries must be reported on the injury or accident report form available in the main office.

### **FIRST AID**

Only those employees certified to provide first aid may provide first aid.

### **CARE OF EQUIPMENT AND SUPPLIES**

All employees are expected to take care of all equipment (*e.g.*, tools, computers, cell phones, etc.) and supplies provided to them. You are responsible for maintaining any equipment provided to you in proper working condition and for promptly reporting any problems with the equipment to the Director of Operations.

If employees find that equipment is not working properly or in any way appears unsafe, they must notify their supervisor immediately so that repairs or adjustments may be made. Under no circumstances should employees start or operate equipment that they deem unsafe, nor should they adjust or modify the safeguards provided.

Delivery drivers are expected to make a daily visual inspection of the vehicles and to promptly report any damage to the vehicle. The drivers must also maintain the cleanliness of the inside and outside of the vehicle. The drivers must report any accident or incident immediately.

Neglect, theft, and/or destruction of the Company's equipment are grounds for disciplinary action, up to and including termination of employment.

## **SMOKING AT THE WORKPLACE**

The Company's policy is to provide smoke-free environments for our employees, customers and visitors. Smoking of any kind is prohibited inside our buildings. Employees may smoke on scheduled breaks or during meal times, as long as they do so in designated areas. Smoking breaks must be limited to 3 times daily. Employees who take excessive smoke breaks may be required to work longer hours to make up for time lost smoking.

## **VIOLENCE AND WEAPONS**

The Company believes in maintaining a safe and healthy workplace, in part by promoting open, friendly, and supportive working relationships among all employees. Violence or threats of violence have no place in our business. Violence is not an effective solution to any problem. Employees are strictly prohibited from bringing any weapons, including knives, pistols, rifles, stun guns, Mace, etc., to work. Conduct that threatens, intimidates or coerces another employee, a customer or a member of the public at any time, including off-duty periods, will also not be tolerated. Furthermore, if you have a problem that is creating stress or otherwise making you agitated, you are encouraged to discuss it with the Director of Operations or the Office Manager.

You are expected to immediately report to the Director of Operations any violation of this policy. Any employee found threatening another employee (directly or indirectly), fighting, and/or carrying weapons to work will be subject to disciplinary action, up to and including termination of employment.

## **DRUG-FREE WORKPLACE**

The Company does not tolerate the presence of illegal drugs or the illegal use of legal drugs in our workplace. The use, possession, distribution, or sale of controlled substances such as drugs or alcohol, or being under the influence of such controlled substances is strictly prohibited while on the Company's premises or while visiting customers. The use of illegal drugs as well as the illegal use of legal drugs is a threat to everyone because it can cause problems with safety, customer service, productivity, and our ability to survive and prosper as a business. If you need to take a prescription drug that affects your ability to perform your job duties, you are required to discuss possible accommodations with the Director of Operations. Violation of this policy will result in disciplinary action, up to and including termination of employment.

To help ensure a safe and healthful working environment, job applicants and employees may be asked to provide body substance samples (such as urine and/or blood) to determine the illicit or illegal use of drugs and alcohol. Refusal to submit to drug testing may result in disciplinary action, up to and including termination of employment. Questions concerning this policy or its administration should be directed to the Director of Operations. Nothing in this section shall be read to override any protections provided to employees by The Regulation and Taxation of Marijuana Act, as amended by St.

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2017,c.55, An Act To Ensure Safe Access To Marijuana, with which the Company will comply fully and recognize all associated employee rights.

Any employee who is convicted of violating criminal drug statutes must notify the Director of Operations of that conviction within five days of the conviction. Failure to do so may lead to disciplinary action.

**Your receipt of this policy statement and signature on the handbook acknowledgment form signify your agreement to comply with this policy.**

### **RESPONDING TO CUSTOMER INQUIRIES AND PROBLEMS**

At the Company, customer satisfaction is the measure of our success. It is the responsibility of each employee who interacts with customers to respond to customer's inquiries and problems in a professional and courteous manner.

### **APPEARANCE AND DRESS**

In order to maintain a clean and safe working environment, all employees are required to wear appropriate clothing on the job.

Employees should always be neatly groomed and clothes should be clean and in good repair.

Your supervisor or department head is responsible for establishing a reasonable dress code appropriate to the job you perform. If your supervisor feels your personal appearance is inappropriate, you may be asked to leave the workplace until you are properly dressed or groomed. Under such circumstance, you will not be compensated for the time away from work. Consult your supervisor if you have questions as to what constitutes appropriate appearance. Where necessary, reasonable accommodation may be made to a person with a disability.

Without unduly restricting individual tastes, the following personal appearance guidelines should be followed:

- Shoes must provide safe, secure footing, and offer protection against hazards.
- Tank tops, tube or halter tops, may not be worn under any circumstances.
- Hairstyles are expected to be clean and in good taste.
- No facial piercings such as nose rings, eyebrow piercings, lip rings, etc. are allowed.
- No jewelry or nail polish while working in production.

### **CONFLICTS OF INTEREST**

You should avoid external business, financial, or employment interests that conflict with the Company's business interests or with your ability to perform your job

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duties. This applies to your possible relationships with any other employer, customer, or business associate.

This policy establishes only the framework within which the Company wishes the business to operate. The purpose of these guidelines is to provide general direction so that employees can seek further clarification on issues related to the subject of acceptable standards of operation. Contact the Human Resources Department for more information or questions about conflicts of interest.

An actual or potential conflict of interest occurs both when an employee's responsibility of loyalty to the Company is compromised by the employee's outside interests and when an employee's influence over a decision may result in a personal gain for that employee or for a relative, friend, or other person with whom the employee has a personal relationship as a result of the Company's business dealings. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

Transactions with outside firms must be conducted within a framework established and controlled by the executive level of the Company. Business dealings with outside firms should not result in unusual gains for those firms. Unusual gain refers to bribes, product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit either the employer, the employee, or both.

Personal gain may result not only in cases where an employee or relative has a significant ownership in a firm with which the Company does business, but also when an employee or relative receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving the Company.

No "presumption of guilt" is created by the mere existence of a relationship with outside firms. However, if employees have any influence on transactions involving purchases, contracts, or leases, it is imperative that they disclose to an officer of the Company as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.

Violations of this rule may lead to disciplinary action, up to and including termination of employment.

### **CODE OF ETHICAL CONDUCT**

To ensure the successful business operation of the Company, we expect that all of our employees will conduct themselves fairly and ethically. The Company's reputation for integrity and excellence requires that our employees carefully observe the spirit and letter of all applicable laws and regulations and at all times exhibit a scrupulous regard for the highest standards of conduct and personal integrity.



The Company's success is dependent upon its outstanding reputation which we are dedicated to preserving. Employees owe a duty to the Company and its principals to act in a way that will merit the excellent reputation enjoyed by the Company.

The Company will comply with all applicable laws and regulations and expects its directors, officers, and employees to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest or unethical conduct, conflicts of interest, as discussed below are strictly prohibited.

In order to avoid any appearance of a conflict of interest, employees are expected to abide by the following code of ethical conduct. Please consult the Director of Operations if you have any questions.

Employees of the Company should not solicit anything of value from any person or organization who has (or may have) a business relationship with the Company.

Employees of the Company should not accept any item of value from any person or organization in exchange for or in connection with a business transaction between the Company and that other person or organization.

Employees may accept items of incidental value (generally, no more than \$25) from customers, suppliers, or others as long as the gift is not given in response to solicitation on your part and as long as it implies no exchange for business purposes. Items may include gifts, gratuities, food, drink and entertainment.

If you are faced with and are unsure how to handle a situation that you believe has the potential to violate this code of ethical conduct, notify the Director of Operations.

Violations of this code may lead to disciplinary action, up to and including termination of employment.

### **SOLICITATION AND DISTRIBUTION**

For the safety, convenience, and protection of all employees, the Company prohibits solicitation and distribution of non-company materials on Company property at all times.

### **PERSONAL CALLS, VISITS, AND BUSINESS**

The Company expects the full attention of its employees while they are working. Although employees may occasionally have to take care of personal matters during the workday, employees should try to conduct such personal business either before or after their scheduled work shift or during breaks or meal periods. Regardless of when any personal call is made, it should be kept short.

Employees should also limit incoming personal calls, visits, or personal transactions. A pattern of excessive personal phone calls, personal visits, and/or private business dealings during work hours is not acceptable and may lead to disciplinary action.

### **BUSINESS EXPENSES**

Employees may occasionally incur expenses on behalf of the Company. Employees must receive prior written approval from the Director of Operations or the Office Manager. The Company will reimburse employees for typical business expenses, such as mileage (*e.g.*, travel to visit a customer during the workday) and certain job-related supplies or materials. The Company will pay mileage reimbursements at the end of each month, upon receipt of the employee's mileage record. In order to be reimbursed for job-related supplies or materials, you must deliver a receipt for the supplies or materials to the Office Manager within 7 days of the purchase.

### **PERSONAL PROPERTY**

Personal items should not be stored or kept in Company desks, lockers or files. The Company will not be responsible for the loss or theft of personal items at its facilities, and employees should have no expectation that documents, photographs, or other items left on Company property will remain private.

### **INSPECTION OF PERSONAL AND COMPANY PROPERTY**

The Company's employees use the property and equipment the Company owns and provides, and may also use the Company's materials, information, and other supplies. You must remember that property supplied by the Company remains the property of the Company. The Company reserves the right to search any Company property (*e.g.*, cell phones, desks, or other storage areas) at any time. The Company also reserves the right to inspect personal property (*e.g.*, purses and knapsacks) during the workday or as employees leave the office. Refusal to allow inspection may lead to disciplinary action, up to and including termination of employment.

### **SECURITY POLICY**

The Security Policy protects both Protected Health Information as defined in the Health Insurance Portability and Accountability Act ("HIPAA") and Protected Personal Information as defined in the Massachusetts Data Security Law.

#### **A. Protected Health Information**

Protected Health Information means individually identifiable information in any form (written, electronic or oral) held or transmitted by a Covered Entity or one of its Business Associates as these terms are defined under HIPAA. Individually identifiable information is information (including demographic information) created or received by a

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healthcare provider, health plan, employer, or healthcare clearinghouse, and that relates to: (i) the past, present or future physical or mental health or condition of an individual, (ii) the provision of healthcare to an individual, or (iii) the past, present or future payment for healthcare to an individual. Individually identifiable information includes information received from the individual that identifies the individual (or could reasonably be used to identify an individual). Identifiers include, but are not limited to: name, SSN, date of birth, and address. A complete list of the individual identifiers is in the Employer's privacy policies and procedures.

Protected Health Information includes genetic information (*i.e.*, an individual's genetic tests; the genetic tests of any family member (including a fetus or embryo) and the manifestation of a disease or disorder in a family member (*i.e.*, family medical history)). Genetic information includes, with respect to an individual, any request for, or receipt of, genetic services or participation in clinical research which includes genetic services by the individual or a family member (including a fetus or embryo). Genetic information does not include the sex or the age of an individual.

Protected Health Information does not include employment records, or education and certain other records subject to or defined in the Family Educational Rights and Privacy Act. The Family Educational Rights and Privacy Act requires schools that accept federal funds to safeguard education records.

#### B. Protected Personal Information

Protected Personal Information is a Massachusetts resident's first name and last name or first initial and last name in combination with any one or more of the following data elements that relate to such resident:

- i. Social security number,
- ii. Driver's license number or state-issued identification card number, or
- iii. Financial account number, or credit card or debit card number, with or without any required security code, access code, personal identification number or password that would permit access to such individual's financial account (*e.g.*, checking account numbers, savings account numbers, etc.).

Protected Personal Information does not include information that is lawfully obtained from publically available information, or from federal, state or local government records lawfully made available to the general public.

#### *Security Officer*

The Company has named Seth Rutherford as the Security Officer with the overall responsibility for the development, implementation, maintenance and supervision of security policies that conform to HIPAA and the Massachusetts Data Security Law. The Security Officer must ensure the confidentiality, integrity and availability of all electronic

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Protected Health Information and Protected Personal Information that the Company creates, receives, maintains or transmits; protect against any reasonably anticipated threats or hazards to the security or integrity of electronic Protected Health Information and Protected Personal Information; protect against any reasonably anticipated uses or disclosures of electronic Protected Health Information and/or Protected Personal Information that are not permitted or required; ensure compliance with HIPAA and the Massachusetts Data Security Law.

The Security Officer is responsible for ensuring that the Company:

- i. Complies with security rules under HIPAA,
- ii. Complies with Massachusetts Data Security Law,
- iii. Develops and implements security policies and procedures that comply with federal and state law,
- iv. Maintains the confidentiality of Protected Health Information particularly all electronic Protected Health Information (“ePHI”) created or received by the Company from the date such information is created or received until it is destroyed,
- v. Tests security safeguards on a routine basis,
- vi. Reviews the scope of the security measures at least annually, or whenever there is a material change in the Company’s business practices that may implicate the security or integrity of records containing Protected Health Information and Protected Personal Information, and
- vii. Provides the appropriate level of training for all employees, as required.

### *Internal Security*

To combat internal risks to security, confidentiality and/or integrity of any electronic, paper or other records containing Protected Health Information and/or Protected Personal Information, and evaluating and improving, where necessary, the effectiveness of the current safeguards for limiting such risks, the following measures are mandatory and effective immediately.

- i. A copy of this Security Policy must be distributed to all employees, who, upon receipt, must acknowledge in writing that he/she has received a copy.
- ii. Employment contracts and/or confidentiality agreements must contain provisions requiring employees to comply with this Security Policy and to prohibit any nonconforming use of Protected Health Information and/or Protected Personal Information during or after employment; with mandatory disciplinary action to be taken for any violation of this Security Policy. Violations may result in disciplinary action, up to and including termination of employment, assignment, or association with the Company. Such disciplinary action shall take into account the severity of the violation and the number of violations.
- iii. The amount of Protected Health Information and/or Protected Personal Information must be limited to the minimum amount needed for legitimate

business purposes, or to comply with the Company's privacy policies and procedures, and federal and state regulations.

- iv. Access to records containing Protected Health Information and Protected Personal Information must be limited to those persons who need to have access to such information for legitimate business purposes or to comply with the Company's privacy policies and procedures, and federal and state regulations.
- v. Electronic access to user identification after multiple unsuccessful attempts to gain access must be blocked.
- vi. All security measures must be reviewed annually, or whenever there is a material change in the Company's business practices that may reasonably implicate the security or integrity of records containing Protected Health Information or Protected Personal Information. The Security Officer is responsible for this review and any recommendation for improved security arising out of that review.
- vii. Terminated employees must return all records containing Protected Health Information and/or Protected Personal Information, in any form, that may at the time of such termination be in the former employee's possession (including all such information stored on laptops or other portable devices or media, and in files, records, work papers, etc.).
- viii. A terminated employee's physical and electronic access to Protected Health Information and Protected Personal Information must be blocked immediately. Such terminated employee shall be required to surrender all keys, IDs, access cards or badges, business cards, etc., that permit access to the Company's premises or information. Moreover, such terminated employee's remote electronic access, e-mail access, internet access, and passwords must be invalidated. The Security Officer shall maintain a highly secured master list of all lock combinations, passwords and keys.
- ix. Current employees' IDs and passwords must be changed periodically. Passwords must contain at least one alpha character, one numeric character and one symbol.
- x. Access to Protected Health Information and Protected Personal Information shall be restricted to active uses and active user accounts only.
- xi. Employees must immediately report any suspicious or unauthorized use of Protected Health Information or Protected Personal Information to the Security Officer.
- xii. Whenever there is a Security Breach requiring notification in accordance with HIPAA and/or the Massachusetts Data Security Law, there shall be an immediate mandatory post-incident review of events and actions taken, if any, with a view to determining whether any changes in the Company's security practices is required to improve the security of Protected Health Information and Protected Personal Information.
- xiii. Employees may not keep open files containing Protected Health Information and/or Protected Personal Information on their desks when they are not at their desks. Employees may not store Company files on personal computers or keep client files offsite.

- xiv. At the end of each work day, all files and other records containing Protected Health Information and/or Protected Personal Information must be secured in a manner that is consistent with the Company's HIPAA privacy policies and procedures, and federal and state law. For example, materials should not be left in open spaces such as administrative assistants' desks or ledges. Also, employees must log off computers at the end of each working day.
- xv. The Company shall develop rules (bearing in mind its business needs) that ensure that reasonable restrictions upon physical access to records containing Protected Health Information and/or Protected Personal Information are in place, including a written procedure that sets forth the manner in which physical access to such records is restricted; and the Company must store such records and data in locked facilities; secure storage areas or locked containers.
- xvi. Access to electronically stored Protected Health Information and/or Protected Personal Information shall be electronically limited to those employees having a unique log-in ID; and re-log-in shall be required when a computer has been inactive for more than a few minutes.
- xvii. Visitors' access to the Company's offices must be restricted. Visitors may not be allowed to wander freely through the Company's offices. Whenever possible, employees should meet with visitors in a secure confidential space when conversations may involve Protected Health Information or Protected Personal Information. From time to time vendors are allowed free access to the Company's office. Employees should not conduct conversation regarding business matters when such visitors are present unless necessary.
- xviii. Paper or electronic records (including records stored on hard drives or other electronic media) containing Protected Health Information and/or Protected Personal Information shall be disposed of only in a manner that complies with HIPAA and M.G.L.c. 93I (*e.g.*, paper documents should be shredded prior to disposal).
- xix. Paper or electronic records (including records stored on hard drives or other electronic media) containing Protected Health Information and/or Protected Personal Information shall be retained in a manner that complies with business practices, Federal and State laws.
- xx. To ensure system compatibility and the security of electronic information, employees may not install or modify software on any computer provided or owned by the Company unless express prior approval is provided by the Company. This approval must be obtained for each installation or service.
- xxi. To ensure that services provide appropriate security measures and that affected equipment can be safeguarded to avoid the downloading of computer viruses, express prior permission must be obtained from the Company before subscribing to, or using, any program that accesses information from external sources, including the use of any communications software, accessing any bulletin board or online service or use of the Internet.

- xxii. Employees may not use password protection or encryption (coding) software or similar protections on any system or file without express prior approval from the Company. Where permission is provided, the password must be provided to the Security Officer. The use of any type of encryption scheme or password, whether or not authorized, in no manner restricts the Company's rights to monitor use of Company -provided technologies (see Technology Policy).
- xxiii. Where passwords and sign-on codes are in place, users may not share their passwords except to the extent required to comply with this Security Policy. Passwords should be guarded and not written or accessible on or near the equipment. Users who have access to the Company's systems through remote technology should take special precautions to ensure that their equipment is not used in an unauthorized manner or by unauthorized individuals.
- xxiv. Whenever information is provided to anyone outside the Company's location in electronic form, such information must be encrypted and/or password protected.
- xxv. Employees who log into the Company's systems by way of a wireless communication must be securely configured and certified by an IT Specialist. If a user has any questions, he or she should contact IT.

### *External Security*

To combat external risks to security, confidentiality and/or integrity of any electronic paper or other records containing Protected Health Information or Protected Personal Information, and evaluating and improving, where necessary, the effectiveness of the current safeguards for limiting such risks, the following measures are mandatory are effective immediately.

- i. There must be reasonably up-to-date firewall protection and operating system security patches, reasonably designed to maintain the integrity of the personal information, installed on all systems processing protected health information and/or protected personal information.
- ii. There must be reasonably up-to-date versions of system security agent software which must include malware protection and reasonably up-to-date patches and virus definitions, installed on all systems processing protected health information and/or protected personal information.
- iii. To the extent technically feasible, all personal information stored on laptops or other portable devices must be encrypted, as must all records and files transmitted across public networks or wirelessly, to the extent technically feasible. Encryption here means the transformation of data into a form in which meaning cannot be assigned without the use of a confidential process or key, unless further defined by regulation by the U.S. Department of Health and Human Services or the Massachusetts Office of Consumer Affairs and Business Regulation.
- iv. All computer systems must be monitored for unauthorized use of or access to personal information.

- v. There must be secure user authentication protocols in place, including: (a) protocols for control of user IDs and other identifiers; (b) a reasonably secure method of assigning and selecting passwords, or use of unique identifier technologies, such as biometrics or token devices; (c) control of data security passwords to ensure that such passwords are kept in a location.

### *Reporting Security Breaches*

The Company will mitigate any harm caused by unauthorized disclosures of Protected Health Information and Protected Personal Information and will notify affected clients and individuals when security breaches occur.

#### A. Breaches of Protected Health Information

A breach is the unauthorized acquisition, use or disclosure of Unsecured Protected Health Information which compromises the security or privacy of the Protected Health Information. A breach does not occur if an unauthorized individual to whom Protected Health Information is disclosed is not reasonably able to retain such information. There are the following two exceptions to the rule:

- i. The unauthorized acquisition, access or use of Protected Health Information is unintentional and made by an employee or individual acting under the authority of a covered entity or business associate if the acquisition, access or use of Protected Health Information was made in good faith and within the course and scope of employment or other professional arrangement with the covered entity or business associate and the Protected Health Information is not further acquired, accessed, used or disclosed.
- ii. If an inadvertent disclosure of Protected Health Information occurs by an individual who is authorized to access Protected Health Information at a facility operated by the covered entity or business associate to another similarly situated employee at the same facility as long as the Protected Health Information is not further acquired, used or disclosed without authorization.

Unsecured Protected Health Information means Protected Health Information in any form that is not protected through technology or methods specified by the federal government. Unsecured Protected Health Information can be vulnerable to a Security Breach in any of the commonly recognized states:

- i. Data in motion (*i.e.*, data that is moving through a network, including wireless transmission);
- ii. Data at rest (*i.e.*, data that resides in databases, file systems, and other structured storage methods);
- iii. Data in use (*i.e.*, data in the process of being created, retrieved, updated or deleted); or
- iv. Data disposed (*e.g.*, discarded paper records or recycled electronic media).

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If the Company's privacy officer appointed in compliance with HIPAA and/or the Security Officer determine that a breach of Unsecured Protected Health Information has occurred, a written notice must be provided to all affected covered individuals without unreasonable delay and within 60 days of the discovery of the breach. If the Security Breach involves Protected Health Information for 500 or more individuals, the privacy officer and/or Security Officer will also notify the U.S. Department of Health and Human Services and the media.

For additional information regarding breaches of Protected Health Information, please refer the Company's HIPAA privacy policies and procedures.

#### B. Breaches of Protected Personal Information

When an employee of the Company knows or has reason to know (1) of a Security Breach, or (2) that the Protected Personal Information of a Massachusetts resident was acquired or used by an unauthorized person or for an unauthorized purpose, that employee must notify the Security Officer immediately. The Security Officer will notify the Attorney General and the Office of Consumer Affairs and Business Regulation of that breach or unauthorized acquisition or use.

A "Security Breach" is the unauthorized acquisition or unauthorized use of unencrypted data or, encrypted electronic data and the confidential process or key that is capable of compromising the security, confidentiality, or integrity of Protected Personal Information, maintained by the Company that creates a substantial risk of identity theft or fraud against a resident of Massachusetts. A good faith but unauthorized acquisition of personal information by a person or agency, or employee or agent, for the lawful purposes of such person or agency, is not a Security Breach unless the Protected Personal Information is used in an unauthorized manner or subject to further unauthorized disclosure.

"Encrypted" is defined as the transformation of data through the use of a 128-bit or higher algorithmic process into a form in which there is a low probability of assigning meaning without use of a confidential process or key, unless further defined by regulation of the Department of Consumer Affairs and Business Regulation.

#### *Training*

The Security Officer (or his/her designee) will provide training for all employees who use or disclose Protected Health Information and/or Protected Personal Information. Furthermore, the Security Officer (or his/her designee) will provide annual training for all managers, employees, and independent contractors, including temporary and contract employees, who have access to Protected Health Information and/or Protected Personal Information on the elements of this Security Policy with the appropriate level of security training as required. All attendees at such training sessions are required to certify their attendance at the training and their familiarity with the Company's requirements for

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ensuring the protection of Protected Health Information and Protected Personal Information.

### *Responsibility and Disciplinary Actions*

Each eligible employee has a duty to the Company to comply with the terms and conditions of this Security Policy. Any violations of this Security Policy must be reported to the Company or Security Officer.

Violations are subject to disciplinary action, up to and including termination of employment. Disciplinary action will be based on the severity of the violation(s) and the number of violations.

If any employee has a question with regard to this Security Policy, he or she should consult privately and confidentially with the Security Officer.

### **TECHNOLOGY POLICY**

253 Organic, LLC provides certain employees with computer and telephone equipment and a variety of technologies, including the capability to send or receive voice mail and electronic mail (“E-mail”) and access to several online services and other external resources. Unauthorized use of telephone and computer equipment can threaten the ability of these systems to operate properly and potentially subject the user and the Company to certain liabilities.

All messages created, sent or retrieved over the Company’s computer and telephone equipment are the sole property of the Company and not the employees. The Company reserves the right to access, search, inspect, copy, delete and disclose any message, communication or file on any voice mail, e-mail or computer system owned or operated by the Company at any time or for any reason. The Company also reserves the right to access, search, inspect, copy, delete and disclose any file stored in any electronic form or any other medium located on Company property or kept with files or equipment that belong to or are provided by the Company at any time for any reason. The Company may also monitor telephone calls to assure quality. All equipment, software, files, disks, diskettes, communications or messages created, maintained or sent or received on any system or storage device provided by the Company are considered Company property.

Confidential information and trade secrets of the Company are not to be disclosed to any third person in any manner whatsoever, including without limitation, by electronic means, under any circumstances. Further, because cell phones, e-mail and voice mail are not completely secure, the utmost discretion should be used before sending and storing confidential or sensitive information, and, if at all possible, the most secure mode of transmission and storage should be used in accordance with the Company’s Security Policy. If there are questions regarding which mode, of transmission is appropriate, please contact the Security Officer.

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Employees may not use the Company's equipment to send or receive messages in violation of federal or state law, in violation of Company policy (*e.g.*, the Security Policy), in violation of the intellectual or other property right or interest of another or in any inappropriate, discriminatory or unauthorized manner. As an example and not by way of limitation, messages that are profane, vulgar, harassing, defamatory or promote a user's personal beliefs on non-business issues are prohibited. Use of Company -provided resources in violation of this policy will result in disciplinary action, up to and including termination. The Company, in its sole discretion, may advise appropriate law enforcement officials of any suspected violations of law without the prior consent of the sender or receiver of a communication or any other person.

### **CONFIDENTIAL AND PROPRIETARY INFORMATION**

The Company considers its confidential and proprietary information and trade secrets, including the confidential and proprietary information and trade secrets of our customers, to be one of its most valuable assets. As a result, employees must carefully protect and must not disclose to any other party at any time (including after any termination of employment) any confidential and proprietary information and trade secrets belonging to the Company or its customers except to the extent necessary to perform your duties for the Company or its clients or with the prior written consent of the Director of Operations. Such protected information includes, but is not limited to, the following examples:

1. Personal or financial information regarding the principals, officers, directors or managers and their affiliated and/or related entities,
2. Personnel information
3. Any information relating to individuals, businesses or other entities which the Company has established a business or working relationship,
4. Customer or vendor lists and information,
5. Financial information,
6. Business strategies,
7. Marketing strategies,
8. Contemplated or pending projects,
9. Proprietary business processes,
10. Development and acquisition plans,
11. Research and development strategies,
12. Formulas, recipes, and product ingredients, and
13. Any other proprietary information whether communicated orally or in documentary, computerized or other tangible form, concerning the Company's or its clients' operations and business.

The removal of materials, documents, files, records and other property belonging to the Company from the premises is not encouraged. However, if you must do so, please

remember that confidential and proprietary information and trade secrets must be safeguarded at all times. Any electronic files you access remotely must also be safeguarded at all times.

Employees should ensure that any materials containing confidential or proprietary information are filed and/or locked up before leaving their work areas each day. During the workday, employees should not leave any sensitive information lying about or unguarded.

Employees who improperly use or disclose trade secrets, confidential or proprietary business information will be subject to disciplinary action, up to and including termination of employment, even if they do not actually benefit from the disclosed information. Neither these guidelines nor any terms set forth in a nondisclosure agreement shall be limiting to the other. Rather, each shall be construed broadly so as to compliment each other to provide the broadest protection for the Company's activities

All Company property, including any materials containing confidential information, must be surrendered immediately upon notice of termination or demand.

If you have any questions about this policy, consult the Director of Operations.

#### **RULES OF CONDUCT AND PROGRESSIVE DISCIPLINARY PROCEDURE**

There are reasonable rules of conduct which must be followed in any organization to help a group of people work together effectively. The Company expects each employee to present himself or herself in a professional appearance and manner. If an employee is not respectful and considerate of others and does not observe reasonable work rules, disciplinary action will be taken.

Depending on the severity or frequency of the disciplinary problems, a verbal or written reprimand, suspension without pay, disciplinary probation, or discharge may be necessary. It is within the Company's sole discretion to select the appropriate disciplinary action to be taken. Notwithstanding the availability of the various disciplinary options, the Company reserves the right to terminate an individual's employment with the Company at its discretion, with or without notice.

The following is not a complete list of infractions for which an employee may be subject to discipline, but it is an example of those infractions that may result in immediate discipline, up to and including termination of employment, for a single offense:

1. Excessive absenteeism (or absence without notice) or lateness (or lateness without notice).
2. Unsatisfactory performance or conduct.
3. Smoking anywhere on the property.
4. Chewing gum and/or eating in areas of the property where it is prohibited such as on the production floor.

5. Use of cell phones for any purpose while working.
6. Dishonesty, including falsification of timecards and other Company-related documents, or misrepresentation of any fact.
7. Fighting, disorderly conduct, horseplay, or any other behavior which is dangerous or disruptive.
8. Cursing in the workplace.
9. Possession of, consumption of, or being under the influence of alcoholic beverages while on Company or customer premises or on Company business.
10. Illegal manufacture, distribution, dispensation, sale, possession, or use of illegal drugs or unprescribed controlled substances.
11. Reporting for work with illegal drugs or unprescribed controlled substances in your body.
12. Possession of weapons, firearms, ammunition, explosives, or fireworks on Company premises (including parking areas) or customer premises.
13. Failure to promptly report a workplace injury or accident involving any of the Company's employees, visitors, equipment, vehicles, or property.
14. Commission of a crime, or other conduct which may damage the reputation of Company.
15. Use of profane language while on Company business.
16. Stealing, misappropriating, or intentionally damaging property belonging to the Company or its visitors or employees.
17. Unauthorized use of the Company's or its customers' name, funds, equipment, or property, including telephone, mail system or other employer-owned equipment.
18. Insubordination, including failure to comply with any work assignments or instructions given by any Company employee with the authority to do so unless such assignment or instruction violates Company policies or federal or state law.
19. Violation of the Company's Equal Employment Opportunity Policy or its Harassment Policy.
20. Interference with the work performance of other employees.
21. Failure to utilize Company machinery or equipment in accordance with the manufacturer's specifications.
22. Failure to cooperate with an internal investigation, including, but not limited to, investigations of violations of these work rules.
23. Failure to maintain the confidentiality of proprietary information belonging to the Company or its customers.
24. Failure to comply with the Company's personnel policies and rules.
25. Disqualification or expiration of Dispensary Agent Identification Card.

## **RE-EMPLOYMENT**

As a general rule, the Company will not rehire former employees who:

- Were dismissed by the Company;
- Resigned without giving two weeks' notice;

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- Were dismissed for inability to perform job duties;
- Had a poor attendance record; or
- Violated work rules or safety rules.

### **MOONLIGHTING/DAYLIGHTING**

The Company discourages our employees from taking additional outside employment. Employees who wish to take on outside employment must first obtain permission from the Director of Operations. Work requirements for the Company, including overtime, must take precedence over any outside employment.

The Company will not permit any employee to take an outside job with an employer in the same or related business as the Company, or which is in any way a competitor of the Company. Employees are not permitted to work for any customer of the Company outside of the regular working hours.

If the Company permits an employee to take outside employment, the employee must report to the Director of Operations when the outside job has started. If you are unable to work when requested by the Company (including overtime), or unable to maintain a high work performance level at the Company, permission to work at the outside job may be rescinded, or your employment with the Company may be terminated.

Employees are expected to be engaged in services and activities for the Company while at work. You may not engage in outside activities during working hours (*i.e.*, daylighting).

## **BENEFITS**

### **WORKERS' COMPENSATION BENEFITS**

The Company purchases workers' compensation insurance for employees who suffer accidental injuries or occupational diseases arising out of and in the course of employment. Benefit coverage and medical payments will be in accordance with the requirements of the Massachusetts Workers' Compensation law.

In the event of an accident or injury, you must notify the Director of Operations immediately, no matter how minor the incident or accident may appear. Depending on the severity of the injury, the injured employee may be referred to an emergency room or a local clinic.

If you are injured, you must complete the necessary accident/incident reports within 24 hours of the injury. The Company reserves the right to require that you be tested for the presence of drugs or alcohol after any accident.

## **VACATION TIME**

The Company provides its full-time employees with vacation time each year as a way to express our appreciation and a way to renew and refresh our employees. Because our business can experience strict deadlines on projects, the Company reserves the right to grant vacations at times that are most suitable for our business conditions and to limit vacations during our busy times.

Employees are eligible for 5 days (40 hours) of vacation per calendar year.

Employees must use all vacation in the calendar year in which it is granted. It should be scheduled and approved by the Director of Operations at least two weeks in advance. Any unused vacation will be forfeited at the end of each calendar year. The Director of Operations may at her discretion allow employees to carry over unused vacation into a subsequent calendar year.

Upon termination of employment for any reason, employees are paid for any accrued but unused vacation during that calendar year.

Part-time, temporary and seasonal employees are not eligible for vacation.

## **SICK TIME**

Employees who works 80 or more hours for the Company during a calendar year are entitled to paid sick leave for the care and treatment of themselves or a family member. Eligible employees accrue 1 hour of paid sick leave for every 30 hours worked up to a maximum of 40 hours of paid sick leave per calendar year.

An employee may use earned sick time:

- to care for the employee's child, spouse, parent, or parent of a spouse, who suffers from a physical or mental illness, injury, or medical condition that requires home care, professional medical diagnosis or care, or preventative medical care;
- to care for the employee's own physical or mental illness, injury, or medical condition that requires home care, professional medical diagnosis or care, or preventative medical care;
- to attend regular medical appointments for the employee or the employee's child, spouse, parent, or parent of a spouse;
- to address the psychological, physical, or legal effects of domestic violence; and
- to travel to and from an appointment, a pharmacy, or other location related to the purpose for sick leave was taken.

If the need is foreseeable, the employee must provide 7 days advance notice of his/her intention to use sick leave. If the need is not foreseeable, the employee must

notify his/her supervisor as soon as practicable. Calling or texting a co-worker is not appropriate notification.

Employees may roll over up to 40 hours of paid sick leave to the next calendar year. In no event, however, will an employee be able to take more than 40 hours of paid sick leave during a calendar year.

Upon termination of employment for any reason, employees are paid for any accrued but unused vacation during that calendar year.

## **LEAVES OF ABSENCE**

### *Maternity Leave*

The Company complies with the Massachusetts Maternity Leave Act and will grant a female employee who has completed at least ninety (90) consecutive days of full-time employment, a leave of absence for the purpose of giving birth or adopting a child under the age of eighteen (18) (or for adopting a child under the age of twenty-three (23) if the child is mentally or physically disabled) up to a period of eight (8) consecutive weeks. At the end of a maternity leave, the employee will be reinstated to her previous or similar position with the same status, pay, benefit accrual and seniority as of the date of her leave unless business necessity makes this impossible or unreasonable and the leave exceeds eight (8) weeks.

### *Jury Leave*

Employees who are called for jury duty will be granted time off with pay to perform this civic duty. Employees must notify the Director of Operations as soon as they learn they have been summoned as a juror so that work arrangements can be made. In order to be paid for Jury Leave, an employee must provide the Director of Operations with the jury summons and a note from the Clerk of the Court indicating the times the employee was in court for jury duty. The Company will pay employees straight time for their regularly scheduled hours of work, minus the compensation they received from the court for their service as jurors, for up to five days of jury service. An employee who is excused from jury duty prior to the end of a regularly scheduled workday must report for work for the remainder of that day, or otherwise notify the Director of Operations of his or her availability to work.

### *Military Leave*

The Company will grant employees called into military service an unpaid leave of absence and reemployment rights as provided by the laws of the United States.

Employees in the military reserve or National Guard will be granted two-weeks off to fulfill their annual two-week training obligation. Upon submission of military pay



vouchers, employees will be paid the difference between military pay and their regular base pay for such two-week training period.

In addition, new FMLA regulations include two types of military family leave referred to as “qualifying exigency leave” and “military caregiver leave”. Employees should speak with the Director of Operations regarding military leave. Reinstatement following military leave will be in compliance with state and federal law.

### **PARKING**

Parking at the Company in designated areas is available for all employees. Employees should consult their supervisor for the location assigned to them. The Company will not be liable for damage, theft, or other destruction of an employee’s property while utilizing the parking lot.

## **ACKNOWLEDGEMENT OF RECEIPT OF EMPLOYEE HANDBOOK**

I have received the current Company employee handbook and have read and understand the material covered. I have had the opportunity to ask questions about the policies in this handbook, and I understand that any future questions that I may have about the handbook or its contents will be answered by the Director of Operations upon request. I agree to and will comply with the policies, procedures, and other guidelines set forth in the handbook. I understand that the Company reserves the right to change, modify, or abolish any or all of the policies, benefits, rules, and regulations contained or described in the handbook as it deems appropriate at any time, with or without notice. I acknowledge that neither the handbook nor its contents are an express or implied contract regarding my employment.

I further understand that all employees of the Company, regardless of their classification or position, are employed on an at-will basis, and their employment is terminable at the will of the employee or the Company at any time, with or without cause, and with or without notice. I have also been informed and understand that no officer, agent, representative, or employee of the Company has any authority to enter into any agreement with any applicant for employment or employee for an employment arrangement or relationship other than on an at-will basis and nothing contained in the policies, procedures, handbooks, or any other documents of the Company shall in any way create an express or implied contract of employment or an employment relationship other than one on an at-will basis.

This handbook is Company property and must be returned upon termination of employment.

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Signature

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Date

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Employee Name: Printed

Applicant: 253 Organic, LLC  
EIN: 82-4664662

### **Management and Operations – Operating Policies and Procedures**

Enclosed are the following:

- *253 Organic, LLC Management Operations and Policies (“MOP”);*
- *253 Organic, LLC Document Retention Policy (“DRP”); and*
- *253 Organic, LLC Employee Handbook (“Handbook”)*

Together these documents include provisions addressing:

- Security (*see pages 16-20 of MOP*);
- prevention of diversion (*see pages 13-14 and 16-20 of MOP*);
- storage of marijuana (*see pages 8-9, 11, and 17 of MOP*);
- transportation of marijuana, if applicable to license type (*page 20-22 of MOP*);
- inventory procedures (*pages 4-8 of MOP*);
- procedures for quality control and testing of product for potential contaminants (*see page 11 of MOP*);
- personnel policies (*see pages 1-1 of MOP*);
- dispensing procedures (*see pages 4 and 12 of MOP*);
- record-keeping procedures (*see enclosed DRP and page 3-4 of MOP*);
- maintenance of financial records (*see enclosed DRP and page 3-4 of MOP*); and
- diversity plans to promote equity among minorities, women, veterans, people with disabilities and people of all gender identities in the operation of 253 Organic, LLC (*see section titled “Equal Employment Opportunity” on page 4 of Handbook*)

## **253 Organic, LLC Diversity Plan (August 2018)**

This Diversity Plan (“Plan”) by 253 Organic, LLC (“253”) is a supplement to the *253 Organic, LLC Management Operations and Policies* and the *253 Organic, LLC Employee Handbook*, revised August 1, 2018. It is designed to comply with 935 CMR 500.101(e), which requires every applicant to have a diversity plan to promote equity among minorities, women, veterans, people with disabilities, people of all gender identities and sexual orientation; note, however, that 253 desires to go above and beyond what is required by statute to also reach out to immigrants, persons who speak English as a second language, single parents, and caregivers (“Diverse Community”).

As of this writing, 253 estimates that it will have the following hiring needs. These needs may change over time.

- 15-18 employees in its Cultivation Facility
- 8-10 employees in its Retail Facility
- 3-5 employees in its Manufacturing Facility

### **Goals**

In general, the goal of this Plan is to promote diversity at all levels of 253, including in entry level, hiring, promotion, and managerial. As a long-term goal, 253 will be recognized as a leader for providing job opportunities, job growth, training and managerial opportunities to the Diverse Community in a caring, nurturing holistic environment where the employee is valued and his or her insight is sought to improve 253, its product, work environment and community.

As short-term goals:

- By two years from the date that all three of 253’s facilities are open for business, 253’s workforce will be comprised of 30% female and minority employees.
- By five years from the date that all three of 253’s facilities are open for business, 253’s workforce will be comprised of 50% female and minority employees.

\* Note that 253 has already reached out to the El Salvadoran community in Hampshire county.

### **Programs**

In an effort to reach qualified community members for employment opportunities, 253 will conduct the following programs. These programs will be conducted at least twice per year, and certain programs will be conducted quarterly.

1. Conduct career fairs for members of the Diverse Community.
2. Schedule and conduct formal interviews with individuals from the Diverse Community.

3. Offer job skill assessments and provide guidance for interested employees to receive leadership and/or managerial training relevant to leadership positions.
4. Conduct internal training sessions regarding embracing diversity, and promoting an open dialogue regarding inclusion, training events designed to bring awareness about diversity.

### **Measurement and Accountability**

253 will use both qualitative and quantitative measures to track progress and determine whether the above-stated goals are achieved. 253 will track the following year over year:

- Number of people from the Diverse Community attending job fairs held by 253.
- Number of people from the Diverse Community with whom 253 conducted formal interviews.
- Number of employees from the Diverse Community to whom 253 offered job skill assessments and guidance to receive leadership and/or managerial training relevant to positions.
- 253 will perform staff surveys about the implementation of its Programs, analyze results, identify areas for improvement, and take corrective steps.
- Track diversity within 253 through internal demographic data.
- Periodic audits for pay equity.

## **Management and Operations – Personnel Policies**

### For compliance with 935 CMR 500.101(1)(c)(7)\*

\*Unless otherwise indicated, all section references are to the *253 Organic, LLC Management Operations and Policies (August 2018)*

- Security - Section M
- Prevention of Diversion - Sections F, G, K, L, M, and O
- Storage of marijuana – Section G
- Transportation of Marijuana, if applicable to license type – Section N
- Inventory Procedures – Section E
- Procedures for Quality Control and Testing of Product for Potential Contaminants – Section J
- Personnel policies - See *253 Organic, LLC Employee Handbook, revised August 1, 2018*
- Dispensing procedures – Sections F, G, O
- Record-keeping Procedures – Section D and *Document Retention Policy (August 2018)*
- Maintenance of Financial Records – Section D; Exhibit A of *Document Retention Policy (August 2018)*
- Diversity Plan - See *Diversity Plan (August 2018)*

### For compliance with 935 CMR 500.105(1)

\*Unless otherwise indicated, all section references are to the *253 Organic, LLC Management Operations and Policies (August 2018)*

- Security - Section M
- Prevention of Diversion - Sections F, G, K, L, M, and O
- Hours of Operation and After Hours Contact Information – Sections A and I
- Storage of marijuana – Section G
- Strains of Marijuana – Section Q
- Record-keeping Procedures – Section D and *Document Retention Policy (August 2018)*
- Procedures for Quality Control and Testing of Product for Potential Contaminants – Section J
- Staffing Plan and Records - See *253 Organic, LLC Employee Handbook, revised August 1, 2018*
- Emergency Procedures – Sections I, N
- Alcohol, Smoke and Drug-Free Workplace – Page 17 of *253 Organic, LLC Employee Handbook, revised August 1, 2018*
- Confidential Information – Pages 2, 3 and 9 of *Document Retention Policy (August 2018)*
- Immediate Dismissal – Page 33 of *253 Organic, LLC Employee Handbook, revised August 1, 2018*

Applicant: 253 Organic, LLC  
EIN: 82-4664662

For compliance with 935 CMR 500.105(9)

*See Document Retention Policy (August 2018)*

253 ORGANIC, LLC

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EMPLOYEE HANDBOOK

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August 7, 2018

The Wagner Law Group, P.C.  
99 Summer Street, 13<sup>th</sup> Floor  
Boston, MA 02110  
(617) 357-5200  
[www.wagnerlawgroup.com](http://www.wagnerlawgroup.com)



253 ORGANIC, LLC  
EMPLOYEE HANDBOOK

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## **WELCOME TO 253 ORGANIC, LLC**

253 Organic, LLC (the “Company”) is providing this handbook to give you an overview of the Company’s policies, benefits, and rules. This handbook contains important information about the Company and about your employment with the Company. Please understand that this handbook only provides general information about the policies, benefits, and regulations governing the employees of the Company and is not a legal document. It is also not intended to be an express or implied contract. The guidelines presented in this handbook are not intended to replace sound management, judgment, and discretion.

This handbook does not create an employment agreement and employees are regarded as employees-at-will (as described more fully herein).

It is impossible to anticipate every situation that may arise in the workplace or to provide information that answers every possible question. The Company, as a result, may be required to interpret portions of this handbook or deviate from its express provisions. In addition, circumstances will undoubtedly require that policies, practices, and benefits described in this handbook change from time to time. As a result, the Company reserves the right to modify, supplement, rescind, or revise any provision of this handbook from time to time as it deems necessary or appropriate in its sole discretion, with or without notice to you.

All of us must work together to make the Company a viable, healthy, and profitable organization. This is the only way we can provide a satisfactory working environment that promotes genuine concern and respect for others including all employees and our customers. If any statements in this handbook are not clear to you, please contact the Director of Operations.

### **COMPANY PHILOSOPHY**

#### **OPEN-DOOR POLICY**

Open communications and the flow of information are important to the Company. The Company communicates with its employees through notices and meetings. These communications are intended to keep you up-to-date and informed.

In keeping with the Company’s philosophy of open communication, all employees have the right and are encouraged to speak freely with management about their job-related concerns.

We urge you to go directly to management to discuss your job-related ideas, recommendations, concerns and other issues which are important to you. If, after talking

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with management, you feel the need for additional discussion, you are encouraged to speak with the Director of Operations. No retaliation or adverse action may be taken against an employee following this policy in good faith.

The most important relationship you will develop at the Company will be between you and your co-workers. However, should you need support from someone other than a co-worker, management is committed to resolving your individual concerns in a timely and appropriate manner.

### **EQUAL EMPLOYMENT OPPORTUNITY**

It is the Company's policy to provide equal employment opportunity to all employees and applicants for employment and not to discriminate on any basis prohibited by law, including race, color, sex, age, religion, national origin, ethnicity, disability, marital status, veteran status, transgender, sexual orientation, transgender, genetic information or any other basis prohibited by law. It is our intent and desire that equal employment opportunities will be provided in employment, recruitment, selection, compensation, benefits, promotion, demotion, layoff, termination and all other terms and conditions of employment. The Director of Operations and all managerial personnel are committed to this policy and its enforcement.

If you are disabled and need a reasonable accommodation in order to perform the essential functions of your job, you may request an accommodation. The Company will make every effort to provide a reasonable accommodation for your known disability (if you are a qualified individual) so that you can perform the essential functions of your job when you can do so without direct threat to yourself or others.

Employees are directed to bring any violation of this policy to the immediate attention of the Director of Operations. Any employee who violates this policy or knowingly retaliates against an employee reporting or complaining of a violation of this policy shall be subject to immediate disciplinary action, up to and including termination of employment. Complaints brought under this policy will be promptly investigated and handled with due regard for the privacy and respect of all involved.

### **HARASSMENT POLICY**

The Company will not tolerate harassment or intimidation of our employees on any basis prohibited by law, including race, color, sex or sexual orientation, age, ancestry, religion, national origin, ethnicity, handicap, disability, marital status, active military or veteran status, or genetic information. It is the Company's policy that any harassment, including acts creating a hostile work environment or any other discriminatory acts directed against our employees, will result in discipline, up to and including termination of employment. The Company also will not tolerate any such harassment of our employees by our customers, vendors or others whom our employees come into contact within our workplace.

Employees must bring any violation of this policy to the immediate attention of the Director of Operations. The Company will thoroughly investigate all claims of harassment taking into consideration the privacy of the individuals involved. Any employee who knowingly retaliates against an employee who has reported workplace harassment or discrimination shall be subject to immediate disciplinary action, up to and including termination of employment.

## **SEXUAL HARASSMENT POLICY**

### *Introduction*

It is the Company's goal to promote a workplace free of sexual harassment. Sexual harassment of employees occurring in the workplace or in other settings in which employees may find themselves in connection with their employment is unlawful and will not be tolerated by the Company.

Employees are encouraged to bring concerns about sexual harassment to the attention of the Company. Any retaliation against an individual who has complained about sexual harassment or retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is also unlawful and will not be tolerated. To achieve our goal of providing a workplace free from sexual harassment, the conduct that is described in this policy will not be tolerated and we have created a procedure to handle concerns of inappropriate conduct.

Because the Company takes allegations of sexual harassment seriously, we will respond promptly to complaints of sexual harassment and where it is determined that such inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate.

Please note that while this policy sets forth our goals of promoting a workplace that is free of sexual harassment, the policy is not designed or intended to limit our authority to discipline or take remedial action for workplace conduct which we deem unacceptable, regardless of whether that conduct satisfies the definition of sexual harassment.

### *Definition of Sexual Harassment*

"Sexual harassment" means sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature when:

- a. submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly as a term or condition of employment or as a basis for employment decisions; or,

- b. such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual's work performance by creating an intimidating, hostile, humiliating or sexually offensive work environment.

Under these definitions, direct or implied requests by a co-worker for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment constitutes sexual harassment.

The legal definition of sexual harassment is broad and in addition to the above examples, other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a workplace environment that is hostile, offensive, intimidating, or humiliating to male or female workers may also constitute sexual harassment.

While it is not possible to list all those additional circumstances that may constitute sexual harassment, the following are some examples of conduct which if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances including the severity of the conduct and its pervasiveness:

- Unwelcome sexual advances – whether they involve physical touching or not;
- Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life; comment on an individual's body, comment about an individual's sexual activity, deficiencies, or prowess;
- Display of sexually suggestive objects, pictures, screensavers, cartoons, or videos;
- Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments;
- Inquiries into one's sexual experiences;
- Discussion of one's sexual activities;
- Sending sexually oriented or sex-based emails or text messages;
- The use of the computer to disseminate sexually oriented or sex-based communications; and
- Access of sexually explicit internet websites.

All employees should take special note that, as stated above, retaliation against an individual who has complained about sexual harassment, and retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is unlawful and will not be tolerated by this Company.

#### *Complaints of Sexual Harassment*

If any of our employees believes that he or she has been subjected to sexual harassment, the employee has the right to file a complaint with the Director of Operations. This may be done in writing or orally.

If you would like to file a complaint you may do so by contacting Director of Operations at:

253 Millers Falls Road  
Turners Falls, MA 01376  
**Tel.**

These individuals are also available to discuss any concerns you may have and to provide information to you about our policy on sexual harassment and our complaint process.

### *Sexual Harassment Investigation*

We will promptly investigate the allegation in a fair and expeditious manner. Furthermore, we will make every effort to maintain confidentiality under the circumstances. Our investigation will include a private interview with the person filing the complaint and with witnesses. We will also interview the person alleged to have committed sexual harassment. When we have completed our investigation, we will, to the extent appropriate inform the person filing the complaint and the person alleged to have committed the conduct of the results of that investigation.

If it is determined that inappropriate conduct has occurred, we will act promptly to eliminate the offending conduct, and where it is appropriate we will also impose disciplinary action.

### *Disciplinary Action*

If it is determined that inappropriate conduct has been committed by one of our employees, we will take such action as is appropriate under the circumstances. Such action may range from counseling to termination from employment, and may include such other forms of disciplinary action as we deem appropriate under the circumstances.

### *State and Federal Remedies*

In addition to the above, if you believe you have been subjected to sexual harassment or any other form of discrimination, you may file a formal complaint with either or both the federal or applicable state agencies set forth below. Using our complaint process does not prohibit you from filing a complaint with these agencies. Each of the agencies listed below has a short time period for filing a claim with the agency (EEOC - 300 days; MCAD - 300 days;). There may be other time periods for filing claims in court.

1. The U.S. Equal Employment Opportunity Commission ("EEOC")  
1 Congress Street, 10<sup>th</sup> Floor  
Boston, MA 02114  
617-565-3200  
<http://www.eeoc.gov/boston/index.html>

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2. Massachusetts Commission Against Discrimination (“MCAD”)  
One Ashburton Place  
Boston, MA 02108  
617-727-3990  
<http://www.mass.gov/mcad/>

## **WORKING AND COMPENSATION**

### **EMPLOYMENT ON AN AT-WILL BASIS**

All employees of the Company, regardless of their classification or position, are employed on an at-will basis. This means that each employee’s employment can be terminated at the will of the employee or the Company at any time, with or without cause and with or without notice. Any officer, agent, representative, or employee of the Company, except in writing and signed by the Director of Operations, does not have the authority to enter into any agreement with any employee or applicant for employment on other than on an at-will basis. Furthermore, nothing contained in the policies, procedures, handbooks, manuals, job descriptions, applications for employment, or any other document of the Company shall in any way create an express or implied contract of employment or an employment relationship on other than an at-will basis.

### **ATTENDANCE AND REPORTING TO WORK**

Each employee is important to the overall success of our operation. When you are not here, someone else must do your job. Consequently, you are expected to report to work on time at the start of your scheduled shift. Reporting to work on time means that you are ready to start work, not just arriving at work, at your scheduled starting time.

The Company depends on its employees to be at work at the times and locations scheduled. Excessive absenteeism and/or tardiness will lead to disciplinary action, up to and including termination of employment. The determination of excessive absenteeism will be made at the discretion of the Company. Absence from work for three consecutive days without properly notifying the Director of Operations will be considered a voluntary resignation. After two days’ absence, you may be required to provide documentation from your doctor or clinic to support an injury- or illness-related absence, and to ensure that you may safely return to work.

If you expect to be absent from the job for an approved reason (*e.g.*, paid time off or a leave of absence), you should notify the Director of Operations of your upcoming absence as far in advance as possible. If you unexpectedly need to be absent from or late to work, you must notify the Director of Operations at least 30 minutes prior to the start of your scheduled shift/workday that you will be late or absent and provide the reason for that absence or lateness. If the Director of Operations is not available, you should contact the Office Manager or leave a voice message for the Office Manager prior to the start of

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your scheduled shift/workday. Be sure to leave your telephone number so the Office Manager can return your call. Failure to properly contact the Company will result in an unexcused absence for disciplinary purposes. Your attendance record is a part of your overall performance rating. Your attendance may be included during your review and may be considered for other disciplinary action up to and including termination of employment.

Whenever possible, medical and dental appointments should be scheduled around your assigned work hours; otherwise, they may be considered absences without pay. If you are unable to schedule an appointment before or after your regularly scheduled workday, you are required to talk to the Director of Operations to make special arrangements.

Furthermore, if you leave work early or for a period of time during the day, you must notify the Director of Operations when you leave and when you expect to return. For example, you should notify the Director of Operations if you need to leave during your lunch break to run an errand.

### **WORKDAY HOURS AND SCHEDULING**

The regularly scheduled workday is established by the Director of Operations when you are hired. Your schedule is subject to change based on business needs. Whenever possible, the Company will try to give you one week advance notice of a change in your schedule, but based on business needs, the Company may not be able to give advance notice.

In case of unplanned conditions, such as bad weather, that may force a schedule change at the last minute, you should contact the Director of Operations.

The Company generally schedules meal periods and rest periods during the workday. Rest periods are 15-minute paid breaks. For meals, our policy is:

- Meal periods will be no less than a 1/2 hour.
- The meal period is unpaid.
- All employees are required to take a lunch break and no employee is authorized, without prior approval, to perform work during the lunch period.
- The employee must spend the meal period away from his/her work station.
- An employee may spend the meal period at his/her assigned work station only if he/she is working during the meal period and overtime hours have been approved.

### **RECORDING HOURS WORKED**

All employees are required to record their time. The Company will provide you with a time card for reporting your hours. Only you are authorized to record your own time.

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Unless specifically authorized by the Company and only if work must be performed, employees may not start recording time before their regularly scheduled starting time or after their regularly scheduled quitting time.

Any time missed, not to exceed 40 hours, during the week may be made up during the same workweek with the supervisor's approval.

Employees must correctly record their hours for each working day. Completed time cards must be given to the Office Manager no later than 10:00 a.m. every Monday after the end of a pay period. If the last day of the pay period is a holiday, time cards are due on the Tuesday after the end of the pay period. Supervisors are responsible to ensure that the time reported by employees is accurate.

Failure to turn in time cards by the applicable deadline may delay your paycheck.

Falsification of time reporting or actual time worked may result in disciplinary action, up to and including termination of employment.

#### **PAY PERIOD AND PAYDAY**

The Company issues paychecks every Friday. Pay periods start on Monday morning and end on Sunday evening. On the Friday after the last day of each pay period, you will receive a paycheck for all hours worked during that pay period. If you use direct deposit, your pay will generally be available for withdrawal from your bank account on the pay date.

#### **HOLIDAYS**

The Company observes the following holidays:

- New Year's Day
- Memorial Day
- Fourth of July
- Labor Day
- Thanksgiving
- Christmas

Full-time employees will be paid for these holidays as long as they are present for work on the workdays immediately before and after that holiday, or have an acceptable reason for being absent on any such days. If a paid holiday falls within an employee's vacation period, the holiday will not be counted as a vacation day.

Part-time, temporary and seasonal employees are not eligible for holiday pay.

## **EMPLOYMENT CLASSIFICATIONS**

Upon being hired by the Company, all new employees must serve a ninety (90) calendar day introductory period. It is especially important that you make the Office Manager aware of any questions or problems you may encounter during this period. Your performance will be carefully monitored during this period. Satisfactory completion of the introductory period does not entitle you to employment for any specific term.

For the sole purpose of determining the allowance of certain employee benefits, employees are classified as:

1. Regular Full-Time Employees - An employee who is scheduled to work an average of forty (40) hours per week on a regular and continuous basis.
2. Regular Part-Time Employees - An employee who is usually scheduled to work less than an average of forty (40) hours per week on a regular and continuous basis. Regular part-time employees are not eligible for participation in those employee benefits programs made available for regular full-time employees.
3. Temporary or Seasonal Employees - An employee whose services are anticipated to be of limited duration falls into this classification. Temporary and seasonal employees are not eligible for participation in those employee benefits programs made available for regular full-time employees.

For payroll purposes, employees will be classified as one of the following:

1. Exempt Employees - Certain employees such as executive and professional employees are paid on a salary basis for all hours worked each week. These employees are expected to work whatever hours are required to accomplish their duties, even if it exceeds their normal workweek. No overtime premium pay will be paid to exempt employees in most circumstances.
2. Non-Exempt Employees - All employees who are not identified as exempt employees are considered non-exempt employees. Non-exempt employees are eligible for payment of overtime premium pay.

## **OVERTIME**

Occasionally it may be necessary for an hourly employee to work beyond his or her normal workday hours. Overtime pay is paid only when work is scheduled, approved, and made known to the hourly employee in advance by a supervisor. The supervisor must obtain approval from the Director of Operations before requesting an hourly employee to work overtime. Under no circumstances may hourly employees work overtime without such prior approval.

Hourly employees will receive overtime pay at a rate of one-and-one-half times their regular hourly rate for all hours worked in excess of 40 in a workweek. Hours cannot be accrued, banked, or averaged from one week to another. Also, in no case, may hourly employees take compensatory time off in a following week in lieu of overtime pay.

To the extent possible, overtime will be distributed equally among all hourly employees in the same classification and position, provided that the hourly employees concerned are equally capable of performing the available work. Decisions regarding overtime work will be made by the appropriate supervisor.

Supervisors must provide an hourly employee with as much advance notice as possible when overtime is required so that the hourly employee can rearrange his/her schedule to work the requested time. Less than two hours is generally not considered adequate advance notice.

Supervisors may not ask hourly employees to work beyond their regularly scheduled hours or cut their meal period short if overtime has not been authorized by the Director of Operations. Such demands on hourly employees violate the Fair Labor Standards Act.

### **MAINTAINING YOUR PERSONNEL RECORDS**

It is your responsibility to provide current information regarding your address, telephone number, emergency contact information, insurance beneficiaries, change in dependents, marital status, etc. Please notify the Office Manager of any changes in your address, phone number, emergency contact information, marital status, number of dependents, etc. Changes in exemptions for tax purposes will only be made upon the receipt of a completed W-4 form.

### **PERSONNEL FILES**

Your personnel file is the property of the Company, and does not belong to you. However, upon request, you may review your personnel file in the presence of Human Resources provided you give the Company reasonable advance notice. You may also request a copy of any item(s) in your personnel file, and if you disagree with an item in your file, you may respond to that item in writing. A reasonable fee may be charged for copies. You may not remove anything from your personnel file.

### **JOB DESCRIPTIONS**

The Company makes every effort to create and maintain accurate job descriptions for all positions within the organization. Each description includes a job information section, a job summary section (giving a general overview of the job's purpose), an essential duties and responsibilities section, a supervisory responsibilities section, a qualifications section (including education and/or experience, language skills,

mathematical skills, reasoning ability, and any certification required), a physical demands section, and a work environment section.

The Company maintains job descriptions to aid in orienting new employees to their jobs, identifying the requirements of each position, establishing hiring criteria, setting standards for employee performance evaluations, and establishing a basis for making reasonable accommodations for individuals with disabilities.

The Company will prepare job descriptions when new positions are created. Existing job descriptions are also reviewed and revised in order to ensure that they are up to date. Job descriptions may also be rewritten periodically to reflect any changes in the position's duties and responsibilities. All employees will be expected to help ensure that their job descriptions are accurate and current, reflecting the work being done.

Employees should remember that job descriptions do not necessarily cover every task or duty that might be assigned, and that additional responsibilities may be assigned as necessary. Contact the Director of Operations if you have any questions or concerns about your job description.

### **PERFORMANCE EVALUATIONS**

Employees may have their job performance reviewed after the first 90 days of employment and on an annual basis by the Company. The Company may conduct evaluations more frequently as deemed necessary and appropriate by management.

### **TERMINATION OF EMPLOYMENT**

Employees are responsible for all Company property, materials or written information issued to them or in their possession or control. Employees must return all such information immediately upon termination of employment.

### **REFERENCES/EMPLOYMENT VERIFICATION**

Any requests for personnel information or references should be directed to the Office Manager. Unless the Company receives a written request from an employee authorizing the Company to provide a reference, it is the Company's policy to confirm only dates of employment and position held in response to a request for a reference on a present or former Company employee. Exceptions to this policy only may be made by the Director of Operations.

The Company strongly discourages you from providing a "personal reference" on behalf of any employee, former employee or non-Company employee. Personal references may not be written on Company letterhead. Any personal references that you provide must include a statement that you are acting in an individual capacity, and not on behalf of the Company.

## **EMPLOYEE ELIGIBILITY VERIFICATION (I-9)**

All employers are required by the Immigration and Reform Control Act of 1986 to verify that all employees hired after November 1986 are authorized to work in the United States. This means that new employees must present documentation that establishes their United States citizenship, permanent resident status, or work authorization for non-immigrant aliens.

After an offer of employment is made and prior to beginning work, employees must complete an Employee Eligibility Verification, Form I-9, and present appropriate verification documentation. All offers of employment, and continued employment of persons whose employment authorization is of limited duration, are conditioned upon such employee's establishing his/her work authorization.

## **STANDARDS AND EXPECTATIONS FOR THE WORKPLACE**

### **SAFETY**

The Company believes in maintaining safe and healthy working conditions for our employees. However, to achieve our goal of providing a safe workplace, each employee must be safety conscious. We have established the following policies and procedures that allow us to provide safe and healthy working conditions. We expect each employee to follow these policies and procedures, to act safely, and to report unsafe conditions to the Director of Operations in a timely manner.

The Company provides information to employees about workplace safety and health issues through regular internal communication channels such as supervisor-employee meetings, bulletin board postings, memos, or other written communications. The Safety Committee, which is composed of representatives from throughout the organization, has been established to help monitor the Company's safety program and to facilitate effective communication between employees and management about workplace safety and health issues. The Safety Committee has responsibility for implementing, administering, monitoring, and evaluating the safety program. Its success depends on the alertness and personal commitment of all.

Employees and supervisors receive periodic workplace safety training. The training covers potential safety and health hazards and safe work practices and procedures to eliminate or minimize hazards.

Some of the best safety improvement ideas come from employees. Those with ideas, concerns, or suggestions for improved safety in the workplace are encouraged to raise them with their supervisor, or with another supervisor or manager, or bring them to the attention of a member of the labor-management safety committee. Reports and concerns about workplace safety issues may be made anonymously if the employee wishes. All reports can be made without fear of reprisal.

### *Reporting Unsafe Conditions or Practices*

Employees are expected to be on the lookout for unsafe working conditions or practices, regardless of how insignificant the injury may appear. If you observe an unsafe working condition, you should warn others, if possible, and report that unsafe working condition to the Director of Operations immediately. If you have a question regarding the safety of your workplace and practices, ask the Director of Operations for additional information.

If you observe a co-worker using an unsafe practice, you are expected to mention this to the co-worker and to the Director of Operations. Likewise, if a co-worker brings to your attention an unsafe practice you may be using, please thank the co-worker and make any necessary adjustments to what you are doing. Safety at work is a team effort.

The Company will not retaliate against an employee who reports an unsafe working. This is important because one goal of the Company is to provide a safe and appropriate workplace.

### **VISITORS IN THE WORKPLACE**

To provide for the safety and security of employees and the facilities at the Company, only authorized visitors are allowed in the workplace. Restricting unauthorized visitors helps maintain safety standards, protects against theft, ensures security of equipment, protects confidential information, safeguards employee welfare, and avoids potential distractions and disturbances.

Because of safety and security reasons, family and friends of employees are discouraged from visiting. In cases of emergency, employees will be called to meet any visitor outside their work area.

If an unauthorized individual is observed on the Company's premises, employees should immediately notify their supervisor or, if necessary, direct the individual to the office.

### **MAINTAINING A SAFE WORKSITE**

We expect employees to establish and maintain a safe worksite. This includes but is not limited to the following:

- Wear appropriate safety gear at all times.
- Wear appropriate clothing around or operating machinery.
- Handle tools and machinery with care and respect.
- Refrain from using cell phones, MP3 players or other electronic devices while handling Company machinery or vehicles or working in the factory.
- Refrain from horseplay and practical jokes in the workplace.

- Never operate Company machinery or vehicles while intoxicated or taking medications that impair your judgment.
- Never tamper with or use equipment in an unauthorized manner.
- Employees may not chew gum or eat candy or food while working in production.
- Employees working in production must wear a hairnet, gloves, proper boots, a clean apron, and any other clothing that the Company deems to be appropriate at all times.

Employees can prevent accidents and contribute to a safe work environment by carefully examining their equipment to see if it in good working order on a routine basis, and report any needed repairs.

### **REPORTING AN INJURY**

Employees are required to report any injury, accident, or safety hazard immediately to the Director of Operations. Minor cuts or abrasions must be treated on the spot. More serious injuries or accidents will be treated accordingly. Serious injuries must be reported on the injury or accident report form available in the main office.

### **FIRST AID**

Only those employees certified to provide first aid may provide first aid.

### **CARE OF EQUIPMENT AND SUPPLIES**

All employees are expected to take care of all equipment (*e.g.*, tools, computers, cell phones, etc.) and supplies provided to them. You are responsible for maintaining any equipment provided to you in proper working condition and for promptly reporting any problems with the equipment to the Director of Operations.

If employees find that equipment is not working properly or in any way appears unsafe, they must notify their supervisor immediately so that repairs or adjustments may be made. Under no circumstances should employees start or operate equipment that they deem unsafe, nor should they adjust or modify the safeguards provided.

Delivery drivers are expected to make a daily visual inspection of the vehicles and to promptly report any damage to the vehicle. The drivers must also maintain the cleanliness of the inside and outside of the vehicle. The drivers must report any accident or incident immediately.

Neglect, theft, and/or destruction of the Company's equipment are grounds for disciplinary action, up to and including termination of employment.



## **SMOKING AT THE WORKPLACE**

The Company's policy is to provide smoke-free environments for our employees, customers and visitors. Smoking of any kind is prohibited inside our buildings. Employees may smoke on scheduled breaks or during meal times, as long as they do so in designated areas. Smoking breaks must be limited to 3 times daily. Employees who take excessive smoke breaks may be required to work longer hours to make up for time lost smoking.

## **VIOLENCE AND WEAPONS**

The Company believes in maintaining a safe and healthy workplace, in part by promoting open, friendly, and supportive working relationships among all employees. Violence or threats of violence have no place in our business. Violence is not an effective solution to any problem. Employees are strictly prohibited from bringing any weapons, including knives, pistols, rifles, stun guns, Mace, etc., to work. Conduct that threatens, intimidates or coerces another employee, a customer or a member of the public at any time, including off-duty periods, will also not be tolerated. Furthermore, if you have a problem that is creating stress or otherwise making you agitated, you are encouraged to discuss it with the Director of Operations or the Office Manager.

You are expected to immediately report to the Director of Operations any violation of this policy. Any employee found threatening another employee (directly or indirectly), fighting, and/or carrying weapons to work will be subject to disciplinary action, up to and including termination of employment.

## **DRUG-FREE WORKPLACE**

The Company does not tolerate the presence of illegal drugs or the illegal use of legal drugs in our workplace. The use, possession, distribution, or sale of controlled substances such as drugs or alcohol, or being under the influence of such controlled substances is strictly prohibited while on the Company's premises or while visiting customers. The use of illegal drugs as well as the illegal use of legal drugs is a threat to everyone because it can cause problems with safety, customer service, productivity, and our ability to survive and prosper as a business. If you need to take a prescription drug that affects your ability to perform your job duties, you are required to discuss possible accommodations with the Director of Operations. Violation of this policy will result in disciplinary action, up to and including termination of employment.

To help ensure a safe and healthful working environment, job applicants and employees may be asked to provide body substance samples (such as urine and/or blood) to determine the illicit or illegal use of drugs and alcohol. Refusal to submit to drug testing may result in disciplinary action, up to and including termination of employment. Questions concerning this policy or its administration should be directed to the Director of Operations. Nothing in this section shall be read to override any protections provided to employees by The Regulation and Taxation of Marijuana Act, as amended by St.

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2017,c.55, An Act To Ensure Safe Access To Marijuana, with which the Company will comply fully and recognize all associated employee rights.

Any employee who is convicted of violating criminal drug statutes must notify the Director of Operations of that conviction within five days of the conviction. Failure to do so may lead to disciplinary action.

**Your receipt of this policy statement and signature on the handbook acknowledgment form signify your agreement to comply with this policy.**

### **RESPONDING TO CUSTOMER INQUIRIES AND PROBLEMS**

At the Company, customer satisfaction is the measure of our success. It is the responsibility of each employee who interacts with customers to respond to customer's inquiries and problems in a professional and courteous manner.

### **APPEARANCE AND DRESS**

In order to maintain a clean and safe working environment, all employees are required to wear appropriate clothing on the job.

Employees should always be neatly groomed and clothes should be clean and in good repair.

Your supervisor or department head is responsible for establishing a reasonable dress code appropriate to the job you perform. If your supervisor feels your personal appearance is inappropriate, you may be asked to leave the workplace until you are properly dressed or groomed. Under such circumstance, you will not be compensated for the time away from work. Consult your supervisor if you have questions as to what constitutes appropriate appearance. Where necessary, reasonable accommodation may be made to a person with a disability.

Without unduly restricting individual tastes, the following personal appearance guidelines should be followed:

- Shoes must provide safe, secure footing, and offer protection against hazards.
- Tank tops, tube or halter tops, may not be worn under any circumstances.
- Hairstyles are expected to be clean and in good taste.
- No facial piercings such as nose rings, eyebrow piercings, lip rings, etc. are allowed.
- No jewelry or nail polish while working in production.

### **CONFLICTS OF INTEREST**

You should avoid external business, financial, or employment interests that conflict with the Company's business interests or with your ability to perform your job

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duties. This applies to your possible relationships with any other employer, customer, or business associate.

This policy establishes only the framework within which the Company wishes the business to operate. The purpose of these guidelines is to provide general direction so that employees can seek further clarification on issues related to the subject of acceptable standards of operation. Contact the Human Resources Department for more information or questions about conflicts of interest.

An actual or potential conflict of interest occurs both when an employee's responsibility of loyalty to the Company is compromised by the employee's outside interests and when an employee's influence over a decision may result in a personal gain for that employee or for a relative, friend, or other person with whom the employee has a personal relationship as a result of the Company's business dealings. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

Transactions with outside firms must be conducted within a framework established and controlled by the executive level of the Company. Business dealings with outside firms should not result in unusual gains for those firms. Unusual gain refers to bribes, product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit either the employer, the employee, or both.

Personal gain may result not only in cases where an employee or relative has a significant ownership in a firm with which the Company does business, but also when an employee or relative receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving the Company.

No "presumption of guilt" is created by the mere existence of a relationship with outside firms. However, if employees have any influence on transactions involving purchases, contracts, or leases, it is imperative that they disclose to an officer of the Company as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.

Violations of this rule may lead to disciplinary action, up to and including termination of employment.

### **CODE OF ETHICAL CONDUCT**

To ensure the successful business operation of the Company, we expect that all of our employees will conduct themselves fairly and ethically. The Company's reputation for integrity and excellence requires that our employees carefully observe the spirit and letter of all applicable laws and regulations and at all times exhibit a scrupulous regard for the highest standards of conduct and personal integrity.

The Company's success is dependent upon its outstanding reputation which we are dedicated to preserving. Employees owe a duty to the Company and its principals to act in a way that will merit the excellent reputation enjoyed by the Company.

The Company will comply with all applicable laws and regulations and expects its directors, officers, and employees to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest or unethical conduct, conflicts of interest, as discussed below are strictly prohibited.

In order to avoid any appearance of a conflict of interest, employees are expected to abide by the following code of ethical conduct. Please consult the Director of Operations if you have any questions.

Employees of the Company should not solicit anything of value from any person or organization who has (or may have) a business relationship with the Company.

Employees of the Company should not accept any item of value from any person or organization in exchange for or in connection with a business transaction between the Company and that other person or organization.

Employees may accept items of incidental value (generally, no more than \$25) from customers, suppliers, or others as long as the gift is not given in response to solicitation on your part and as long as it implies no exchange for business purposes. Items may include gifts, gratuities, food, drink and entertainment.

If you are faced with and are unsure how to handle a situation that you believe has the potential to violate this code of ethical conduct, notify the Director of Operations.

Violations of this code may lead to disciplinary action, up to and including termination of employment.

### **SOLICITATION AND DISTRIBUTION**

For the safety, convenience, and protection of all employees, the Company prohibits solicitation and distribution of non-company materials on Company property at all times.

### **PERSONAL CALLS, VISITS, AND BUSINESS**

The Company expects the full attention of its employees while they are working. Although employees may occasionally have to take care of personal matters during the workday, employees should try to conduct such personal business either before or after their scheduled work shift or during breaks or meal periods. Regardless of when any personal call is made, it should be kept short.

Employees should also limit incoming personal calls, visits, or personal transactions. A pattern of excessive personal phone calls, personal visits, and/or private business dealings during work hours is not acceptable and may lead to disciplinary action.

### **BUSINESS EXPENSES**

Employees may occasionally incur expenses on behalf of the Company. Employees must receive prior written approval from the Director of Operations or the Office Manager. The Company will reimburse employees for typical business expenses, such as mileage (*e.g.*, travel to visit a customer during the workday) and certain job-related supplies or materials. The Company will pay mileage reimbursements at the end of each month, upon receipt of the employee's mileage record. In order to be reimbursed for job-related supplies or materials, you must deliver a receipt for the supplies or materials to the Office Manager within 7 days of the purchase.

### **PERSONAL PROPERTY**

Personal items should not be stored or kept in Company desks, lockers or files. The Company will not be responsible for the loss or theft of personal items at its facilities, and employees should have no expectation that documents, photographs, or other items left on Company property will remain private.

### **INSPECTION OF PERSONAL AND COMPANY PROPERTY**

The Company's employees use the property and equipment the Company owns and provides, and may also use the Company's materials, information, and other supplies. You must remember that property supplied by the Company remains the property of the Company. The Company reserves the right to search any Company property (*e.g.*, cell phones, desks, or other storage areas) at any time. The Company also reserves the right to inspect personal property (*e.g.*, purses and knapsacks) during the workday or as employees leave the office. Refusal to allow inspection may lead to disciplinary action, up to and including termination of employment.

### **SECURITY POLICY**

The Security Policy protects both Protected Health Information as defined in the Health Insurance Portability and Accountability Act ("HIPAA") and Protected Personal Information as defined in the Massachusetts Data Security Law.

#### **A. Protected Health Information**

Protected Health Information means individually identifiable information in any form (written, electronic or oral) held or transmitted by a Covered Entity or one of its Business Associates as these terms are defined under HIPAA. Individually identifiable information is information (including demographic information) created or received by a

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healthcare provider, health plan, employer, or healthcare clearinghouse, and that relates to: (i) the past, present or future physical or mental health or condition of an individual, (ii) the provision of healthcare to an individual, or (iii) the past, present or future payment for healthcare to an individual. Individually identifiable information includes information received from the individual that identifies the individual (or could reasonably be used to identify an individual). Identifiers include, but are not limited to: name, SSN, date of birth, and address. A complete list of the individual identifiers is in the Employer's privacy policies and procedures.

Protected Health Information includes genetic information (*i.e.*, an individual's genetic tests; the genetic tests of any family member (including a fetus or embryo) and the manifestation of a disease or disorder in a family member (*i.e.*, family medical history)). Genetic information includes, with respect to an individual, any request for, or receipt of, genetic services or participation in clinical research which includes genetic services by the individual or a family member (including a fetus or embryo). Genetic information does not include the sex or the age of an individual.

Protected Health Information does not include employment records, or education and certain other records subject to or defined in the Family Educational Rights and Privacy Act. The Family Educational Rights and Privacy Act requires schools that accept federal funds to safeguard education records.

#### B. Protected Personal Information

Protected Personal Information is a Massachusetts resident's first name and last name or first initial and last name in combination with any one or more of the following data elements that relate to such resident:

- i. Social security number,
- ii. Driver's license number or state-issued identification card number, or
- iii. Financial account number, or credit card or debit card number, with or without any required security code, access code, personal identification number or password that would permit access to such individual's financial account (*e.g.*, checking account numbers, savings account numbers, etc.).

Protected Personal Information does not include information that is lawfully obtained from publically available information, or from federal, state or local government records lawfully made available to the general public.

#### *Security Officer*

The Company has named Seth Rutherford as the Security Officer with the overall responsibility for the development, implementation, maintenance and supervision of security policies that conform to HIPAA and the Massachusetts Data Security Law. The Security Officer must ensure the confidentiality, integrity and availability of all electronic

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Protected Health Information and Protected Personal Information that the Company creates, receives, maintains or transmits; protect against any reasonably anticipated threats or hazards to the security or integrity of electronic Protected Health Information and Protected Personal Information; protect against any reasonably anticipated uses or disclosures of electronic Protected Health Information and/or Protected Personal Information that are not permitted or required; ensure compliance with HIPAA and the Massachusetts Data Security Law.

The Security Officer is responsible for ensuring that the Company:

- i. Complies with security rules under HIPAA,
- ii. Complies with Massachusetts Data Security Law,
- iii. Develops and implements security policies and procedures that comply with federal and state law,
- iv. Maintains the confidentiality of Protected Health Information particularly all electronic Protected Health Information (“ePHI”) created or received by the Company from the date such information is created or received until it is destroyed,
- v. Tests security safeguards on a routine basis,
- vi. Reviews the scope of the security measures at least annually, or whenever there is a material change in the Company’s business practices that may implicate the security or integrity of records containing Protected Health Information and Protected Personal Information, and
- vii. Provides the appropriate level of training for all employees, as required.

### *Internal Security*

To combat internal risks to security, confidentiality and/or integrity of any electronic, paper or other records containing Protected Health Information and/or Protected Personal Information, and evaluating and improving, where necessary, the effectiveness of the current safeguards for limiting such risks, the following measures are mandatory and effective immediately.

- i. A copy of this Security Policy must be distributed to all employees, who, upon receipt, must acknowledge in writing that he/she has received a copy.
- ii. Employment contracts and/or confidentiality agreements must contain provisions requiring employees to comply with this Security Policy and to prohibit any nonconforming use of Protected Health Information and/or Protected Personal Information during or after employment; with mandatory disciplinary action to be taken for any violation of this Security Policy. Violations may result in disciplinary action, up to and including termination of employment, assignment, or association with the Company. Such disciplinary action shall take into account the severity of the violation and the number of violations.
- iii. The amount of Protected Health Information and/or Protected Personal Information must be limited to the minimum amount needed for legitimate

- business purposes, or to comply with the Company's privacy policies and procedures, and federal and state regulations.
- iv. Access to records containing Protected Health Information and Protected Personal Information must be limited to those persons who need to have access to such information for legitimate business purposes or to comply with the Company's privacy policies and procedures, and federal and state regulations.
  - v. Electronic access to user identification after multiple unsuccessful attempts to gain access must be blocked.
  - vi. All security measures must be reviewed annually, or whenever there is a material change in the Company's business practices that may reasonably implicate the security or integrity of records containing Protected Health Information or Protected Personal Information. The Security Officer is responsible for this review and any recommendation for improved security arising out of that review.
  - vii. Terminated employees must return all records containing Protected Health Information and/or Protected Personal Information, in any form, that may at the time of such termination be in the former employee's possession (including all such information stored on laptops or other portable devices or media, and in files, records, work papers, etc.).
  - viii. A terminated employee's physical and electronic access to Protected Health Information and Protected Personal Information must be blocked immediately. Such terminated employee shall be required to surrender all keys, IDs, access cards or badges, business cards, etc., that permit access to the Company's premises or information. Moreover, such terminated employee's remote electronic access, e-mail access, internet access, and passwords must be invalidated. The Security Officer shall maintain a highly secured master list of all lock combinations, passwords and keys.
  - ix. Current employees' IDs and passwords must be changed periodically. Passwords must contain at least one alpha character, one numeric character and one symbol.
  - x. Access to Protected Health Information and Protected Personal Information shall be restricted to active uses and active user accounts only.
  - xi. Employees must immediately report any suspicious or unauthorized use of Protected Health Information or Protected Personal Information to the Security Officer.
  - xii. Whenever there is a Security Breach requiring notification in accordance with HIPAA and/or the Massachusetts Data Security Law, there shall be an immediate mandatory post-incident review of events and actions taken, if any, with a view to determining whether any changes in the Company's security practices is required to improve the security of Protected Health Information and Protected Personal Information.
  - xiii. Employees may not keep open files containing Protected Health Information and/or Protected Personal Information on their desks when they are not at their desks. Employees may not store Company files on personal computers or keep client files offsite.



- xiv. At the end of each work day, all files and other records containing Protected Health Information and/or Protected Personal Information must be secured in a manner that is consistent with the Company's HIPAA privacy policies and procedures, and federal and state law. For example, materials should not be left in open spaces such as administrative assistants' desks or ledges. Also, employees must log off computers at the end of each working day.
- xv. The Company shall develop rules (bearing in mind its business needs) that ensure that reasonable restrictions upon physical access to records containing Protected Health Information and/or Protected Personal Information are in place, including a written procedure that sets forth the manner in which physical access to such records is restricted; and the Company must store such records and data in locked facilities; secure storage areas or locked containers.
- xvi. Access to electronically stored Protected Health Information and/or Protected Personal Information shall be electronically limited to those employees having a unique log-in ID; and re-log-in shall be required when a computer has been inactive for more than a few minutes.
- xvii. Visitors' access to the Company's offices must be restricted. Visitors may not be allowed to wander freely through the Company's offices. Whenever possible, employees should meet with visitors in a secure confidential space when conversations may involve Protected Health Information or Protected Personal Information. From time to time vendors are allowed free access to the Company's office. Employees should not conduct conversation regarding business matters when such visitors are present unless necessary.
- xviii. Paper or electronic records (including records stored on hard drives or other electronic media) containing Protected Health Information and/or Protected Personal Information shall be disposed of only in a manner that complies with HIPAA and M.G.L.c. 93I (*e.g.*, paper documents should be shredded prior to disposal).
- xix. Paper or electronic records (including records stored on hard drives or other electronic media) containing Protected Health Information and/or Protected Personal Information shall be retained in a manner that complies with business practices, Federal and State laws.
- xx. To ensure system compatibility and the security of electronic information, employees may not install or modify software on any computer provided or owned by the Company unless express prior approval is provided by the Company. This approval must be obtained for each installation or service.
- xxi. To ensure that services provide appropriate security measures and that affected equipment can be safeguarded to avoid the downloading of computer viruses, express prior permission must be obtained from the Company before subscribing to, or using, any program that accesses information from external sources, including the use of any communications software, accessing any bulletin board or online service or use of the Internet.

- xxii. Employees may not use password protection or encryption (coding) software or similar protections on any system or file without express prior approval from the Company. Where permission is provided, the password must be provided to the Security Officer. The use of any type of encryption scheme or password, whether or not authorized, in no manner restricts the Company's rights to monitor use of Company -provided technologies (see Technology Policy).
- xxiii. Where passwords and sign-on codes are in place, users may not share their passwords except to the extent required to comply with this Security Policy. Passwords should be guarded and not written or accessible on or near the equipment. Users who have access to the Company's systems through remote technology should take special precautions to ensure that their equipment is not used in an unauthorized manner or by unauthorized individuals.
- xxiv. Whenever information is provided to anyone outside the Company's location in electronic form, such information must be encrypted and/or password protected.
- xxv. Employees who log into the Company's systems by way of a wireless communication must be securely configured and certified by an IT Specialist. If a user has any questions, he or she should contact IT.

### *External Security*

To combat external risks to security, confidentiality and/or integrity of any electronic paper or other records containing Protected Health Information or Protected Personal Information, and evaluating and improving, where necessary, the effectiveness of the current safeguards for limiting such risks, the following measures are mandatory are effective immediately.

- i. There must be reasonably up-to-date firewall protection and operating system security patches, reasonably designed to maintain the integrity of the personal information, installed on all systems processing protected health information and/or protected personal information.
- ii. There must be reasonably up-to-date versions of system security agent software which must include malware protection and reasonably up-to-date patches and virus definitions, installed on all systems processing protected health information and/or protected personal information.
- iii. To the extent technically feasible, all personal information stored on laptops or other portable devices must be encrypted, as must all records and files transmitted across public networks or wirelessly, to the extent technically feasible. Encryption here means the transformation of data into a form in which meaning cannot be assigned without the use of a confidential process or key, unless further defined by regulation by the U.S. Department of Health and Human Services or the Massachusetts Office of Consumer Affairs and Business Regulation.
- iv. All computer systems must be monitored for unauthorized use of or access to personal information.

- v. There must be secure user authentication protocols in place, including: (a) protocols for control of user IDs and other identifiers; (b) a reasonably secure method of assigning and selecting passwords, or use of unique identifier technologies, such as biometrics or token devices; (c) control of data security passwords to ensure that such passwords are kept in a location.

### *Reporting Security Breaches*

The Company will mitigate any harm caused by unauthorized disclosures of Protected Health Information and Protected Personal Information and will notify affected clients and individuals when security breaches occur.

#### A. Breaches of Protected Health Information

A breach is the unauthorized acquisition, use or disclosure of Unsecured Protected Health Information which compromises the security or privacy of the Protected Health Information. A breach does not occur if an unauthorized individual to whom Protected Health Information is disclosed is not reasonably able to retain such information. There are the following two exceptions to the rule:

- i. The unauthorized acquisition, access or use of Protected Health Information is unintentional and made by an employee or individual acting under the authority of a covered entity or business associate if the acquisition, access or use of Protected Health Information was made in good faith and within the course and scope of employment or other professional arrangement with the covered entity or business associate and the Protected Health Information is not further acquired, accessed, used or disclosed.
- ii. If an inadvertent disclosure of Protected Health Information occurs by an individual who is authorized to access Protected Health Information at a facility operated by the covered entity or business associate to another similarly situated employee at the same facility as long as the Protected Health Information is not further acquired, used or disclosed without authorization.

Unsecured Protected Health Information means Protected Health Information in any form that is not protected through technology or methods specified by the federal government. Unsecured Protected Health Information can be vulnerable to a Security Breach in any of the commonly recognized states:

- i. Data in motion (*i.e.*, data that is moving through a network, including wireless transmission);
- ii. Data at rest (*i.e.*, data that resides in databases, file systems, and other structured storage methods);
- iii. Data in use (*i.e.*, data in the process of being created, retrieved, updated or deleted); or
- iv. Data disposed (*e.g.*, discarded paper records or recycled electronic media).

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If the Company's privacy officer appointed in compliance with HIPAA and/or the Security Officer determine that a breach of Unsecured Protected Health Information has occurred, a written notice must be provided to all affected covered individuals without unreasonable delay and within 60 days of the discovery of the breach. If the Security Breach involves Protected Health Information for 500 or more individuals, the privacy officer and/or Security Officer will also notify the U.S. Department of Health and Human Services and the media.

For additional information regarding breaches of Protected Health Information, please refer the Company's HIPAA privacy policies and procedures.

#### B. Breaches of Protected Personal Information

When an employee of the Company knows or has reason to know (1) of a Security Breach, or (2) that the Protected Personal Information of a Massachusetts resident was acquired or used by an unauthorized person or for an unauthorized purpose, that employee must notify the Security Officer immediately. The Security Officer will notify the Attorney General and the Office of Consumer Affairs and Business Regulation of that breach or unauthorized acquisition or use.

A "Security Breach" is the unauthorized acquisition or unauthorized use of unencrypted data or, encrypted electronic data and the confidential process or key that is capable of compromising the security, confidentiality, or integrity of Protected Personal Information, maintained by the Company that creates a substantial risk of identity theft or fraud against a resident of Massachusetts. A good faith but unauthorized acquisition of personal information by a person or agency, or employee or agent, for the lawful purposes of such person or agency, is not a Security Breach unless the Protected Personal Information is used in an unauthorized manner or subject to further unauthorized disclosure.

"Encrypted" is defined as the transformation of data through the use of a 128-bit or higher algorithmic process into a form in which there is a low probability of assigning meaning without use of a confidential process or key, unless further defined by regulation of the Department of Consumer Affairs and Business Regulation.

#### *Training*

The Security Officer (or his/her designee) will provide training for all employees who use or disclose Protected Health Information and/or Protected Personal Information. Furthermore, the Security Officer (or his/her designee) will provide annual training for all managers, employees, and independent contractors, including temporary and contract employees, who have access to Protected Health Information and/or Protected Personal Information on the elements of this Security Policy with the appropriate level of security training as required. All attendees at such training sessions are required to certify their attendance at the training and their familiarity with the Company's requirements for

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ensuring the protection of Protected Health Information and Protected Personal Information.

### *Responsibility and Disciplinary Actions*

Each eligible employee has a duty to the Company to comply with the terms and conditions of this Security Policy. Any violations of this Security Policy must be reported to the Company or Security Officer.

Violations are subject to disciplinary action, up to and including termination of employment. Disciplinary action will be based on the severity of the violation(s) and the number of violations.

If any employee has a question with regard to this Security Policy, he or she should consult privately and confidentially with the Security Officer.

### **TECHNOLOGY POLICY**

253 Organic, LLC provides certain employees with computer and telephone equipment and a variety of technologies, including the capability to send or receive voice mail and electronic mail ("E-mail") and access to several online services and other external resources. Unauthorized use of telephone and computer equipment can threaten the ability of these systems to operate properly and potentially subject the user and the Company to certain liabilities.

All messages created, sent or retrieved over the Company's computer and telephone equipment are the sole property of the Company and not the employees. The Company reserves the right to access, search, inspect, copy, delete and disclose any message, communication or file on any voice mail, e-mail or computer system owned or operated by the Company at any time or for any reason. The Company also reserves the right to access, search, inspect, copy, delete and disclose any file stored in any electronic form or any other medium located on Company property or kept with files or equipment that belong to or are provided by the Company at any time for any reason. The Company may also monitor telephone calls to assure quality. All equipment, software, files, disks, diskettes, communications or messages created, maintained or sent or received on any system or storage device provided by the Company are considered Company property.

Confidential information and trade secrets of the Company are not to be disclosed to any third person in any manner whatsoever, including without limitation, by electronic means, under any circumstances. Further, because cell phones, e-mail and voice mail are not completely secure, the utmost discretion should be used before sending and storing confidential or sensitive information, and, if at all possible, the most secure mode of transmission and storage should be used in accordance with the Company's Security Policy. If there are questions regarding which mode, of transmission is appropriate, please contact the Security Officer.

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Employees may not use the Company's equipment to send or receive messages in violation of federal or state law, in violation of Company policy (*e.g.*, the Security Policy), in violation of the intellectual or other property right or interest of another or in any inappropriate, discriminatory or unauthorized manner. As an example and not by way of limitation, messages that are profane, vulgar, harassing, defamatory or promote a user's personal beliefs on non-business issues are prohibited. Use of Company -provided resources in violation of this policy will result in disciplinary action, up to and including termination. The Company, in its sole discretion, may advise appropriate law enforcement officials of any suspected violations of law without the prior consent of the sender or receiver of a communication or any other person.

### **CONFIDENTIAL AND PROPRIETARY INFORMATION**

The Company considers its confidential and proprietary information and trade secrets, including the confidential and proprietary information and trade secrets of our customers, to be one of its most valuable assets. As a result, employees must carefully protect and must not disclose to any other party at any time (including after any termination of employment) any confidential and proprietary information and trade secrets belonging to the Company or its customers except to the extent necessary to perform your duties for the Company or its clients or with the prior written consent of the Director of Operations. Such protected information includes, but is not limited to, the following examples:

1. Personal or financial information regarding the principals, officers, directors or managers and their affiliated and/or related entities,
2. Personnel information
3. Any information relating to individuals, businesses or other entities which the Company has established a business or working relationship,
4. Customer or vendor lists and information,
5. Financial information,
6. Business strategies,
7. Marketing strategies,
8. Contemplated or pending projects,
9. Proprietary business processes,
10. Development and acquisition plans,
11. Research and development strategies,
12. Formulas, recipes, and product ingredients, and
13. Any other proprietary information whether communicated orally or in documentary, computerized or other tangible form, concerning the Company's or its clients' operations and business.

The removal of materials, documents, files, records and other property belonging to the Company from the premises is not encouraged. However, if you must do so, please

remember that confidential and proprietary information and trade secrets must be safeguarded at all times. Any electronic files you access remotely must also be safeguarded at all times.

Employees should ensure that any materials containing confidential or proprietary information are filed and/or locked up before leaving their work areas each day. During the workday, employees should not leave any sensitive information lying about or unguarded.

Employees who improperly use or disclose trade secrets, confidential or proprietary business information will be subject to disciplinary action, up to and including termination of employment, even if they do not actually benefit from the disclosed information. Neither these guidelines nor any terms set forth in a nondisclosure agreement shall be limiting to the other. Rather, each shall be construed broadly so as to compliment each other to provide the broadest protection for the Company's activities

All Company property, including any materials containing confidential information, must be surrendered immediately upon notice of termination or demand.

If you have any questions about this policy, consult the Director of Operations.

#### **RULES OF CONDUCT AND PROGRESSIVE DISCIPLINARY PROCEDURE**

There are reasonable rules of conduct which must be followed in any organization to help a group of people work together effectively. The Company expects each employee to present himself or herself in a professional appearance and manner. If an employee is not respectful and considerate of others and does not observe reasonable work rules, disciplinary action will be taken.

Depending on the severity or frequency of the disciplinary problems, a verbal or written reprimand, suspension without pay, disciplinary probation, or discharge may be necessary. It is within the Company's sole discretion to select the appropriate disciplinary action to be taken. Notwithstanding the availability of the various disciplinary options, the Company reserves the right to terminate an individual's employment with the Company at its discretion, with or without notice.

The following is not a complete list of infractions for which an employee may be subject to discipline, but it is an example of those infractions that may result in immediate discipline, up to and including termination of employment, for a single offense:

1. Excessive absenteeism (or absence without notice) or lateness (or lateness without notice).
2. Unsatisfactory performance or conduct.
3. Smoking anywhere on the property.
4. Chewing gum and/or eating in areas of the property where it is prohibited such as on the production floor.

5. Use of cell phones for any purpose while working.
6. Dishonesty, including falsification of timecards and other Company-related documents, or misrepresentation of any fact.
7. Fighting, disorderly conduct, horseplay, or any other behavior which is dangerous or disruptive.
8. Cursing in the workplace.
9. Possession of, consumption of, or being under the influence of alcoholic beverages while on Company or customer premises or on Company business.
10. Illegal manufacture, distribution, dispensation, sale, possession, or use of illegal drugs or unprescribed controlled substances.
11. Reporting for work with illegal drugs or unprescribed controlled substances in your body.
12. Possession of weapons, firearms, ammunition, explosives, or fireworks on Company premises (including parking areas) or customer premises.
13. Failure to promptly report a workplace injury or accident involving any of the Company's employees, visitors, equipment, vehicles, or property.
14. Commission of a crime, or other conduct which may damage the reputation of Company.
15. Use of profane language while on Company business.
16. Stealing, misappropriating, or intentionally damaging property belonging to the Company or its visitors or employees.
17. Unauthorized use of the Company's or its customers' name, funds, equipment, or property, including telephone, mail system or other employer-owned equipment.
18. Insubordination, including failure to comply with any work assignments or instructions given by any Company employee with the authority to do so unless such assignment or instruction violates Company policies or federal or state law.
19. Violation of the Company's Equal Employment Opportunity Policy or its Harassment Policy.
20. Interference with the work performance of other employees.
21. Failure to utilize Company machinery or equipment in accordance with the manufacturer's specifications.
22. Failure to cooperate with an internal investigation, including, but not limited to, investigations of violations of these work rules.
23. Failure to maintain the confidentiality of proprietary information belonging to the Company or its customers.
24. Failure to comply with the Company's personnel policies and rules.
25. Disqualification or expiration of Dispensary Agent Identification Card.

The following is not a complete list of infractions that may result in immediate termination of employment, for a single offense:



1. Diversion of marijuana, which shall be reported to law enforcement officials and the Massachusetts Cannabis Control Commission (the “Commission”).
2. Engagement in unsafe practices with regard to Company operations and are reported to the Commission.
3. Conviction, guilty plea, plea of *nolo contendere*, or admission to sufficient facts of felony drug offense involving distribution to a minor in the Commonwealth of Massachusetts, or a like violation of the laws of another state, the United States or a foreign jurisdiction or a military, territorial or Native American tribal authority.

### **RE-EMPLOYMENT**

As a general rule, the Company will not rehire former employees who:

- Were dismissed by the Company;
- Resigned without giving two weeks’ notice;
- Were dismissed for inability to perform job duties;
- Had a poor attendance record; or
- Violated work rules or safety rules.

### **MOONLIGHTING/DAYLIGHTING**

The Company discourages our employees from taking additional outside employment. Employees who wish to take on outside employment must first obtain permission from the Director of Operations. Work requirements for the Company, including overtime, must take precedence over any outside employment.

The Company will not permit any employee to take an outside job with an employer in the same or related business as the Company, or which is in any way a competitor of the Company. Employees are not permitted to work for any customer of the Company outside of the regular working hours.

If the Company permits an employee to take outside employment, the employee must report to the Director of Operations when the outside job has started. If you are unable to work when requested by the Company (including overtime), or unable to maintain a high work performance level at the Company, permission to work at the outside job may be rescinded, or your employment with the Company may be terminated.

Employees are expected to be engaged in services and activities for the Company while at work. You may not engage in outside activities during working hours (*i.e.*, daylighting).

## **BENEFITS**

### **WORKERS' COMPENSATION BENEFITS**

The Company purchases workers' compensation insurance for employees who suffer accidental injuries or occupational diseases arising out of and in the course of employment. Benefit coverage and medical payments will be in accordance with the requirements of the Massachusetts Workers' Compensation law.

In the event of an accident or injury, you must notify the Director of Operations immediately, no matter how minor the incident or accident may appear. Depending on the severity of the injury, the injured employee may be referred to an emergency room or a local clinic.

If you are injured, you must complete the necessary accident/incident reports within 24 hours of the injury. The Company reserves the right to require that you be tested for the presence of drugs or alcohol after any accident.

### **VACATION TIME**

The Company provides its full-time employees with vacation time each year as a way to express our appreciation and a way to renew and refresh our employees. Because our business can experience strict deadlines on projects, the Company reserves the right to grant vacations at times that are most suitable for our business conditions and to limit vacations during our busy times.

Employees are eligible for 5 days (40 hours) of vacation per calendar year.

Employees must use all vacation in the calendar year in which it is granted. It should be scheduled and approved by the Director of Operations at least two weeks in advance. Any unused vacation will be forfeited at the end of each calendar year. The Director of Operations may at her discretion allow employees to carry over unused vacation into a subsequent calendar year.

Upon termination of employment for any reason, employees are paid for any accrued but unused vacation during that calendar year.

Part-time, temporary and seasonal employees are not eligible for vacation.

### **SICK TIME**

Employees who works 80 or more hours for the Company during a calendar year are entitled to paid sick leave for the care and treatment of themselves or a family member. Eligible employees accrue 1 hour of paid sick leave for every 30 hours worked up to a maximum of 40 hours of paid sick leave per calendar year.

An employee may use earned sick time:

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- to care for the employee's child, spouse, parent, or parent of a spouse, who suffers from a physical or mental illness, injury, or medical condition that requires home care, professional medical diagnosis or care, or preventative medical care;
- to care for the employee's own physical or mental illness, injury, or medical condition that requires home care, professional medical diagnosis or care, or preventative medical care;
- to attend regular medical appointments for the employee or the employee's child, spouse, parent, or parent of a spouse;
- to address the psychological, physical, or legal effects of domestic violence; and
- to travel to and from an appointment, a pharmacy, or other location related to the purpose for sick leave was taken.

If the need is foreseeable, the employee must provide 7 days advance notice of his/her intention to use sick leave. If the need is not foreseeable, the employee must notify his/her supervisor as soon as practicable. Calling or texting a co-worker is not appropriate notification.

Employees may roll over up to 40 hours of paid sick leave to the next calendar year. In no event, however, will an employee be able to take more than 40 hours of paid sick leave during a calendar year.

Upon termination of employment for any reason, employees are paid for any accrued but unused vacation during that calendar year.

## **LEAVES OF ABSENCE**

### *Maternity Leave*

The Company complies with the Massachusetts Maternity Leave Act and will grant a female employee who has completed at least ninety (90) consecutive days of full-time employment, a leave of absence for the purpose of giving birth or adopting a child under the age of eighteen (18) (or for adopting a child under the age of twenty-three (23) if the child is mentally or physically disabled) up to a period of eight (8) consecutive weeks. At the end of a maternity leave, the employee will be reinstated to her previous or similar position with the same status, pay, benefit accrual and seniority as of the date of her leave unless business necessity makes this impossible or unreasonable and the leave exceeds eight (8) weeks.

### *Jury Leave*

Employees who are called for jury duty will be granted time off with pay to perform this civic duty. Employees must notify the Director of Operations as soon as they learn they have been summoned as a juror so that work arrangements can be made.

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In order to be paid for Jury Leave, an employee must provide the Director of Operations with the jury summons and a note from the Clerk of the Court indicating the times the employee was in court for jury duty. The Company will pay employees straight time for their regularly scheduled hours of work, minus the compensation they received from the court for their service as jurors, for up to five days of jury service. An employee who is excused from jury duty prior to the end of a regularly scheduled workday must report for work for the remainder of that day, or otherwise notify the Director of Operations of his or her availability to work.

### *Military Leave*

The Company will grant employees called into military service an unpaid leave of absence and reemployment rights as provided by the laws of the United States.

Employees in the military reserve or National Guard will be granted two-weeks off to fulfill their annual two-week training obligation. Upon submission of military pay vouchers, employees will be paid the difference between military pay and their regular base pay for such two-week training period.

In addition, new FMLA regulations include two types of military family leave referred to as “qualifying exigency leave” and “military caregiver leave”. Employees should speak with the Director of Operations regarding military leave. Reinstatement following military leave will be in compliance with state and federal law.

### **PARKING**

Parking at the Company in designated areas is available for all employees. Employees should consult their supervisor for the location assigned to them. The Company will not be liable for damage, theft, or other destruction of an employee’s property while utilizing the parking lot.

## **ACKNOWLEDGEMENT OF RECEIPT OF EMPLOYEE HANDBOOK**

I have received the current Company employee handbook and have read and understand the material covered. I have had the opportunity to ask questions about the policies in this handbook, and I understand that any future questions that I may have about the handbook or its contents will be answered by the Director of Operations upon request. I agree to and will comply with the policies, procedures, and other guidelines set forth in the handbook. I understand that the Company reserves the right to change, modify, or abolish any or all of the policies, benefits, rules, and regulations contained or described in the handbook as it deems appropriate at any time, with or without notice. I acknowledge that neither the handbook nor its contents are an express or implied contract regarding my employment.

I further understand that all employees of the Company, regardless of their classification or position, are employed on an at-will basis, and their employment is terminable at the will of the employee or the Company at any time, with or without cause, and with or without notice. I have also been informed and understand that no officer, agent, representative, or employee of the Company has any authority to enter into any agreement with any applicant for employment or employee for an employment arrangement or relationship other than on an at-will basis and nothing contained in the policies, procedures, handbooks, or any other documents of the Company shall in any way create an express or implied contract of employment or an employment relationship other than one on an at-will basis.

This handbook is Company property and must be returned upon termination of employment.

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Signature

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Date

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Employee Name: Printed

# Document Retention Policy (August 2018)

## PURPOSE

The purpose of the Policy is:

1. To ensure that necessary records and documents of the Dispensary, Cultivation and Kitchen are adequately protected and maintained.
2. To ensure that records that are no longer needed by the Dispensary, Cultivation or Kitchen or are of no value are discarded at the appropriate time.
3. To aid officers, directors, employees, independent contractors, and other service providers of the Dispensary, Cultivation or Kitchen in understanding their obligations in retaining documents.

## ADMINISTRATION

The Director of Operations (the “*Administrator*”) is in charge of the administration of the Policy and the implementation of processes and procedures to ensure that the Document Retention Schedule, attached hereto as Exhibit A, is followed. The Administrator is also authorized, upon consultation with legal counsel and, as appropriate, with the assistance of legal counsel, to: (i) make modifications to the Document Retention Schedule from time to time to ensure that it is in compliance with local, state, and federal laws, and that it includes the appropriate document and record categories’ for the Dispensary; (ii) monitor local, state, and federal laws affecting record retention; (iii) annually review the record retention and disposal program; and (iv) monitor compliance with the Policy. All questions regarding the application of the Policy to any particular document or record shall be directed to the Administrator, who shall have authority to interpret the Policy’s requirements with respect to such document or record.

## APPLICATION

The Policy applies to all physical records and electronic documents, including both original documents and reproductions, which relate to the business, operations, and affairs of the Cultivation and Kitchen. Electronic documents include, but are not limited to, e-mail, internet files, text files, sound and movie files, PDF documents, and all Microsoft Office or other formatted files.

The protection and destruction of documents pertaining to any item in the Cultivation and Kitchen’s collections shall be governed by a Collections Ethics Policy adopted by the Board of Directors.

**DOCUMENT PROTECTION:** Documents will be stored in a protected environment for the time periods set forth on the Document Retention Schedule.

**DOCUMENT DESTRUCTION:** Hardcopies of documents will be destroyed by shredding after they have been retained for the time periods set forth in the Document Retention Schedule. Electronic documents will be destroyed by means proven to destroy the applicable media after they have been retained for the time periods set forth in the Document Retention Schedule.

**EXCEPTION TO DOCUMENT RETENTION SCHEDULE:** In the event of a governmental audit, investigation, or threatened or pending litigation, record disposal shall be suspended upon the direction of the Administrator. In addition, the Administrator should be informed immediately of any threatened or actual legal action as soon as the situation becomes apparent and the Administrator shall thereafter suspend record disposal until the threat of litigation or actual litigation has been finally resolved.

**EXHIBIT A****DOCUMENT RETENTION SCHEDULE**

This Document Retention Schedule is organized as follows:

- I. Corporate Records
- II. Accounting and Financial Records
- III. Correspondence and Internal Memoranda
- IV. Electronic Documents
- V. Legal Files and Papers
- VI. Insurance Records
- VII. Payroll Documents
- VIII. Personnel Records
- IX. Property Records
- X. Tax Records
- XI. Contributions Records
- XII. Operations Records
- XIII. Media/Marketing Materials
- XIV. Miscellaneous**

**CORPORATE RECORDS**

<b>RECORD TYPE</b>	<b>RETENTION PERIOD</b>
Formation/Organizational Documents: 1. Articles of Incorporation 2. Bylaws 3. Minute Book	Permanent
Board and committee meeting audio/visual recordings/ Closing of the company	2 years (as noted above, official minutes of such meetings should be kept permanently)
Board and committee meeting agenda, meeting materials	2 years (provided that anything referenced in such materials but subject to a longer retention time pursuant to this Document Retention Schedule shall be kept for such longer period)
Board Policies (e.g., Conflict of Interest Policy, Whistleblower Policy)	Permanently (current version with revision history)
Annual Corporate Filings/ Confidential Information	Permanent

**ACCOUNTING AND FINANCIAL RECORDS**

<b>RECORD TYPE</b>	<b>RETENTION PERIOD</b>
Accounts Payable (ledgers and schedules)	7 years
Accounts Receivable (ledgers and schedules)	7 years
Chart of Accounts & Confidential Information	Permanent
Petty Cash Receipts/Documents	3 years
Credit Card Receipts	3 years
Annual Audit Reports and Financial Statements	Permanent
Annual Audit Records (including work papers and other documents related to the audit)	7 years after completion of audit
Annual Plans and Budgets	2 years
Employee Expense Reports	7 years
General Ledgers	Permanent
Interim Financial Statements	7 years
Notes Receivable (ledgers and schedules)	7 years
Invoices	3 years
Bank Statements	3 years
Monetary Transactions	3 years
Bank Reconciliations	3 years
Cancelled Checks	3 years, unless important for payments or contracts
Deposit Slips	3 years
Investment Records	7 years after sale of investment
Fiscal Policies and Procedures	Permanent (current version with revision history)



### **CORRESPONDENCE AND INTERNAL MEMORANDA**

*GENERAL RETENTION PRINCIPLE:* Most correspondence and internal memoranda should be retained for the same period as the documents they pertain to or support. For instance, a letter pertaining to a particular contract would be retained as long as the contract (10 years after expiration). It is recommended that records that support a particular project be kept with the project and take on the retention time of that particular project file. Correspondence or memoranda that do not pertain to documents having a prescribed retention period should generally be discarded sooner. Copies of interoffice correspondence and documents where a copy will be in the originating department file should be read and destroyed, unless that information provides reference to or direction to other documents and must be kept for project traceability.

<b>RECORD TYPE</b>	<b>RETENTION PERIOD</b>
Routine correspondence matters: <ol style="list-style-type: none"> <li>1. Routine letters and notes that require no acknowledgment or follow-up, such as notes of appreciation, congratulations, letters of transmittal, and plans for meetings.</li> <li>2. Form letters that require no follow-up.</li> <li>3. Letters of general inquiry and replies that complete a cycle of correspondence.</li> <li>4. Letters or complaints requesting specific action that have no further value after changes are made or action taken (such as name or address change).</li> <li>5. Other letters of inconsequential subject matter or that definitely close correspondence to which no further reference will be necessary.</li> <li>6. Chronological correspondence files.</li> </ol>	2 years
Non-routine correspondence matters, or correspondence regarding matters of significant lasting consequence	Permanent

RECORD TYPE	RETENTION PERIOD
Email Correspondence	3 years, provided that if the correspondence would have been subject to a retention period longer than the 3-year default period if the correspondence had originally been generated in hard copy, then Service Providers must take steps to retain the correspondence in a location outside of the email environment for the same period that would have been applicable if the correspondence had originally been generated in hard copy. [See also <i>"ELECTRONIC DOCUMENTS" below.</i> ]

### ELECTRONIC DOCUMENTS

**GENERAL RETENTION PRINCIPLE:** The Policy applies only to those electronic documents that relate to the business, operations, and affairs of the Dispensary, Cultivation and Kitchen. The Policy does not apply to email correspondence that (1) does not relate to the business, operations, and affairs of the Dispensary, Cultivation or Kitchen, or (2) is an advertisement, targeted mass mailing, or electronic document of a similar character.

All email correspondence relating to the business, operations, and affairs of the Dispensary, Cultivation or Kitchen must be retained in a location outside of the email environment (*i.e.*, printed in hard copy and kept in an appropriate file or copied and/or moved and retained on a form of electronic media external to the email system) in accordance with the requirements of the Policy applicable to the email correspondence if it originally had been generated in hard copy.

RECORD TYPE	RETENTION PERIOD
Email correspondence	3 years, provided that if the correspondence would have been subject to a retention period longer than the 3-year default period if the correspondence had originally been generated in hard copy, then Service Providers must take steps to retain the correspondence in a location outside of the email environment for the same period that would have been applicable if the correspondence had originally been generated in hard copy.
Webpage Files	1 year
Text/Formatted Files ( <i>e.g.</i> Microsoft Word documents, Microsoft Excel documents, etc.)	5 years
Sound and Movie Files ( <i>e.g.</i> MP3s, AVIs, etc.)	Permanent, unless for personal use

RECORD TYPE	RETENTION PERIOD
PowerPoint Presentations	1 year after termination of use, provided that if such presentation would have been subject to a retention period longer than the 1-year default period if the presentation had originally been generated in hard copy ( <i>e.g.</i> , Board meeting materials), then Service Providers must take steps to retain the presentation in a location outside of the email environment for the same period that would have been applicable if the correspondence had originally been generated in hard copy
PDF Documents	6 years, provided that if the PDF would have been subject to a retention period longer than the 6-year default period if the document had originally been generated in hard copy, then Service Providers must take steps to retain the document in a location outside of the email environment for the same period that would have been applicable if the PDF had originally been generated in hard copy.

#### **LEGAL FILES AND PAPERS**

RECORD TYPE	RETENTION PERIOD
Contracts and Related Correspondence	10 years after all obligations end (unless a longer period is specified for a particular type of contract)
Corporate Licenses and Permits	Permanent
Legal Memoranda and Opinions (including all subject matter files)	7 years after close of the matter
Litigation Files	1 year after the expiration of appeals or time for filing appeals
Court Orders	Permanent
Request for Departure from Document Retention Policy	10 years
Warranties	7 years after expiration

#### **INSURANCE RECORDS\***

RECORD TYPE	RETENTION PERIOD
Annual Loss Summaries	10 years
Audits and Adjustments	3 years after final adjustment
Certificates of Insurance Issued to the Dispensary	Permanent
Claims Files (including correspondence, medical records, injury documentation, etc.)	Permanent
Group Insurance Plans – Active Employees	Until plan is amended or terminated
Group Insurance Plans – Retirees	Permanent or until 6 years after the death of the last eligible participant
Inspections	3 years
Insurance Policies (including expired policies) – Property, D&O, Workers’ Compensation, General Liability	Permanent
Journal Entry Support Data	7 years
Loss Runs	10 years
Releases and Settlements	25 years

**PAYROLL DOCUMENTS\***

[See also “TAX RECORDS” below.]

RECORD TYPE	RETENTION PERIOD
Employee Deduction Authorizations	4 years after termination of employment
Payroll Deductions	7 years after termination of employment
W-2 and W-4 Forms	7 years after termination of employment
Garnishments, Assignments, Attachments	7 years after termination of employment
Labor Distribution Cost Records	7 years
Payroll Registers (gross and net)	Permanent
Time Cards/Time Sheets	2 years

RECORD TYPE	RETENTION PERIOD
Unclaimed Wage Records	6 years

**PERSONNEL RECORDS \***

RECORD TYPE	RETENTION PERIOD
Records of Commissions, Bonuses, Incentives, Awards	7 years
EEO-I / EEO-2 Employer Information Reports	2 years after superseded or filing (whichever is longer)
Employee Earnings Records to each employee, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment.	7 years after termination of employment
Employee Handbook	Permanent (1 copy with complete revision history)
Employee Medical Records	6 years after termination of employment
Employee Personnel Records (including attendance records, application forms, job or status change records, performance evaluations, termination papers, withholding information, garnishments, test results, training and qualification records)	6 years after termination of employment
Employment Contracts/Offer Letters	7 years after termination of employment
Employment Records – Correspondence with employment agencies, Advertisements for job openings	3 years from date of hiring decision
Employment Records – All Non-Hired Applicants (including applications and resumes, whether solicited or unsolicited, results	2-4 years (4 years if the file contains any correspondence which might be construed as an offer)
Job Descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions	3 years after superseded
Personnel Count Records	3 years

RECORD TYPE	RETENTION PERIOD
Forms I-9	3 years after hiring or 1 year after termination of employment, whichever is later
Workers' Compensation Documentation	10 years
Notice of completed responsible vendor and 8 hour related duty training	3 years
All background reports	3 years
Record of any disciplinary action taken	3 years
Copy of the application that was submitted to the commission on behalf of any prospective Marijuana Establishment Agent	3 years
Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of the presenters.	3 years
Documentation of verification of references	3 years
All materials submitted to the Commission pursuant to 935 CMR 500.030(B)	7 years
Job descriptions or employment contract that includes duties, authority, responsibility, qualifications, and supervision	3 years

\* *TO THE EXTENT DOCUMENTS IN SECTION VI (INSURANCE RECORDS), SECTION VII (PAYROLL DOCUMENTS), AND SECTION VIII (PERSONNEL RECORDS) RELATE TO EMPLOYEES, RECORDS SHOULD BE KEPT WITH RESPECT TO EACH EMPLOYEE.*

#### **PROPERTY RECORDS**

[See also "TAX RECORDS" below.]

RECORD TYPE	RETENTION PERIOD
Property Deeds, Assessments, Licenses, Rights of Way, Related Correspondence	Permanent

<b>RECORD TYPE</b>	<b>RETENTION PERIOD</b>
Original Purchase/Sale/Lease/Mortgage Agreements	Permanent
Property Insurance Policies	Permanent

### **TAX RECORDS**

*GENERAL RETENTION PRINCIPLE:* the Cultivation and Kitchen must keep books of account or records sufficient to establish its gross income, deductions, credits, or other matters required to be shown on any tax return. These documents and records shall be kept for as long as the contents thereof may become material in the administration of federal, state, and local income, franchise, and property tax laws.

<b>RECORD TYPE</b>	<b>RETENTION PERIOD</b>
Tax-Exemption Documents and All Related Correspondence (including Form 1023 and state applications and IRS and state determinations)	Permanent
Tax or Employer Identification Number	Permanent
IRS Forms 1099	7 years
IRS Rulings	Permanent
Excise Tax Records	7 years
Payroll Tax Records	7 years
Tax Bills, Receipts, Statements	7 years
Tax Returns - Income, Franchise, Property	Permanent
Annual Information Returns – Federal and State	Permanent
IRS or other Government Audit Records	Permanent
Tax Work paper Packages – Originals	7 years
Sales/Use Tax Records	7 years

**CONTRIBUTION RECORDS**

<b>RECORD TYPE</b>	<b>RETENTION PERIOD</b>
Records of Contributions	Permanent
Wills, trusts or other documents evidencing terms of gifts	Permanent

**OPERATIONS<sup>1</sup>**

<b>RECORD TYPE</b>	<b>RETENTION PERIOD</b>
A staffing plan(demonstrating accessible hours and safe cultivation conditions) and staffing records in compliance with 935 CMR 500.105(I)	7 years
Inventory records as required by 935 CMR 500.105 (H)	7 years
Seed-to-sale tracking records for all marijuana and marijuana products as required by 935 CMR 500.105(H)(5)	7 years
Waste disposal records or marijuana and marijuana products as required under 935 500.105(L)	2 years
Records for each vehicle used for transporting marijuana or marijuana products, vehicle registration, inspection and insurance	2 years
Incident reporting records under 935 500.110(H)(I)	The longer of 1 year or the duration of an open investigation

**MEDIA/MARKETING RECORDS**

<b>RECORD TYPE</b>	<b>RETENTION PERIOD</b>
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<b>RECORD TYPE</b>	<b>RETENTION PERIOD</b>
Press Releases	Permanent
Marketing Materials	3 years

**MISCELLANEOUS**

<b>RECORD TYPE</b>	<b>RETENTION PERIOD</b>
Consultant's Reports	2 years
Material of historical value, including pictures and publications	Permanent
State and County Fundraising Registrations (and Renewals, if any)	3 years

### **Table Of Contents;**

- A) Hours of Operation**
- B) Job Descriptions and Employment Contracts**
- C) Terms**
- D) Business Records and Retention**
- E) Inventory Control**
- F) Labeling of Marijuana and Marijuana products**
- G) Packaging and Storage**
- H) Audits**
- I) General**
- J) Cleaning/Sanitation/Quality Control**
- K) Agent Registry Identification Card and Requirements**
- L) Physical Plant and Requirements of Dispensary and Cultivation/MFG Location**
- M) Security**
- N) Transportation**
- O) Additional Retail Procedures**
- P) Additional Product Manufacturing Procedures**
- Q) Additional Information on Cultivation**
- R) Banking/ Cash Procedure**

## **A) Hours of Operation**

*The Cultivation, Product Manufacturing location will be operating between the hours of 7:00 a.m. And 6:00 p.m.*

*The Retail Dispensary location will be operating between the hours of 9:00 a.m. And 8:00 p.m.*

## **B) Job Descriptions and Employment Contracts**

*Attached as Exhibit A are the Job Descriptions of key positions within the Facilities. Each description includes a more detailed description of the Personnel Duties and Responsibilities, Authority, and Qualifications of each position. Those positions include:*

- a. Director of Operations
- b. Cultivation Manager
- c. Dispensary Manager
- d. Kitchen Manager
- e. Extraction Manager
- f. Harvest Quality Control Technician

## **2. Personnel Supervision**

*The Director of Operations (Seth Rutherford) is responsible for all employee supervision at the Company. There will be four intermediary managers. All cultivation employees will report to the Cultivation Manager. All kitchen employees will report to the Kitchen Manager. All extraction employees will report to the Extraction Manager. All Dispensary employees will report to the Dispensary manager.*

## **3. Training & Confidentiality 935 CMR 500.105 (B)**

*The Cultivation, Kitchen, Extraction, Dispensary Managers will conduct in-person and hands-on training for all new employees upon hire and for all current employees no less than annually, within the cultivation building. The Dispensary Manager will conduct in-person and hands-on training for all new employees upon hire and for all current employees no less than annually, within the Dispensary building. Such training will cover no less than 8 hours of instruction and will be documented with sign in and sign out sheets for every employee that indicate the time, date, place and substance of such training. Attached as Exhibit M is a copy of the Employee Training Acknowledgement Form. Training topics conducted by the Manager(s) will include:*

### **3.a. Employee Handbook and Job Descriptions**

## 253 Organic, LLC Management Operations and Policies

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3.b. Employment Laws and Employee Rights

3.c. Cultivation Operations and Administration as detailed in (935 CMR 500.105)

3.d. Kitchen/Extraction Operations and Administration as detailed in (935 CMR 500.105)

3.e. Dispensary Operations and Administration as detailed in (935 CMR 500.105)

### 4. Performance Evaluations

*The Manager(s) will conduct in-person employee performance evaluations for all new employees after 6 months of employment and for all current employees no less than annually, within the cultivation building. Performance evaluations will be recorded on the Employee Performance Evaluation Form attached as Exhibit C.*

### 5. Disciplinary Actions

*The Manager(s) will be responsible for taking disciplinary actions against any employee. The Managers will follow the guidelines of the Progressive Discipline Policy attached as Exhibit D. Disciplinary action will be documented by the Manager(s) according to the requirements of the attached Progressive Discipline Policy and regulations promulgated by the Commission.*

### 6. Employment Contracts

*The Company will not utilize written employment contracts with any of its employees. All of the Companies employees will be employed under verbal at-will contracts, subject to the terms and conditions of the Employee Handbook attached as Exhibit E.*

## C) Terms

1. Marijuana will also be referenced in this document as “cannabis”
2. Cultivation, Kitchen, Extraction will be referenced as “Cultivation” as they are in the same building
3. Employee's with approved Marijuana Establishment Agent Registration Card will be referred to as “agent(s)”

4. 253 Organic, LLC will be referred to as “ Company” and refers to activities of Cultivation, Dispensary, Kitchen and Extraction.

5. Retail Dispensary will be referred to as “ Dispensary”

6. Cultivation, Dispensary, Kitchen and Extraction individually are referred to as a “site(s)”

**D) Business Records and Retention (935 CMR 500.105 (I))**

**1. Records**

*The Companies business records shall be created, stored, maintained and retained by the Dispensary in accordance with all rules and regulations promulgated by the Commission, and applicable City and County Ordinances, as well as any other applicable rules, regulations and laws. The Company will maintain business records according to the requirements of the Document Retention Policy attached as Exhibit F. Maintained business records will include, but not be limited to the following items:*

- a. Corporate Records
- b. Accounting and Financial Records
- c. Correspondence and Internal Memoranda
- d. Electronic Documents
- e. Legal Files and Papers
- f. Insurance Records
- g. Payroll Documents
- h. Personnel Records
- i. Property Records
- j. Tax Records
- k. Media/Marketing Materials
- l. Miscellaneous Records
- m. Confidential Information

**2. Retention**

*The Company will maintain the inventory control documentation and records described above at the dispensary in compliance with the Document Retention Policy attached as Exhibit F for at least five years from the date on the inventory control document, and upon request, provide the required inventory control documentation to the Commission for review in either electronic or print format. The Companies inventory control documentation and*

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*records will include all categories of documents listed in Section II (Accounting and Financial Records) of the Document Retention Policy and will be stored both within the cultivation's electronic servers and the internet-based Flowhub inventory control system.*

*a.a. Method(s)*

*The method of the Companies business record retention will depend on the type of business record to be retained. The Business Record Retention Policy attached at Exhibit F lays out in great detail the method of retention for a given business record.*

*a.b. Time-Frame*

*The time-frame of the business record retention will depend on the type of business record to be retained. The Business Record Retention Policy attached at Exhibit F lays out in great detail the time-frame of retention for a given business record.*

### **E) Inventory Control (935 CMR 500.105 (H)(3)(4))**

*The Company has contracted with and will utilize at all times a comprehensive internet-based cannabis inventory control system known as METRC.*

#### **1. Inventory Control System**

*The Companies inventory control system, known as METRC, is an internet-based comprehensive cannabis inventory and sales tracking system that is guaranteed to comply with all Commission's regulations pertaining to the cultivation, processing, tracking, identification, transfer, transportation and sale of cannabis. The METRC inventory control system is both Cultivation, Infused Products, Dispensary, Extraction focused, allowing for:*

- a. Tracking of every cannabis plant, nutrient, watt, drop and yield within the Dispensary or its cultivation site*
- b. Tracking of every cannabis plant from seed to sale*
- c. Tracking of nutrients, schedules, yields, environmental variables and grow costs*
- d. Capture of historical data and test results*
- e. Provision of batch and plant tracking*
- f. Creation of Commission approved dispatch and trip plans*
- g. Tracking of shake, spillage, evaporation, edibles, concentrates and any theft*
- h. Conduct Monthly and annual inventory audits*

*The Site's will document each day's beginning inventory, acquisitions, harvests, sales, disbursements, disposal of unusable cannabis, and ending inventory by requiring its agents to input all such information into the METRC inventory control system on a daily basis. The Site's agents will also be required to input into the METRC inventory control system, on a daily basis, all information pertaining to:*

- a. Acquiring cannabis from another cultivation facility
- b. Acquiring cannabis from another dispensary or another dispensary's cultivation site
- c. Each batch of cannabis cultivated by the Dispensary's cultivation site
- d. Provision of cannabis to another dispensary
- e. Receiving cannabis infused edible products from another dispensary

## **2. Disposal of Unusable Cannabis (935 CMR 500.105)**

*The Company will establish and implement an inventory control system for the cannabis that documents the disposal of cannabis that is not usable cannabis. The Site's will require the use of the Cannabis Disposal Form attached as Exhibit G to document any such disposal, which will include the description of and reason for the cannabis being disposed of including, if applicable, the number of any failed or unusable plants; the date of disposal; the method of disposal; the name and registry identification number of the site agent responsible for the disposal. The Company will contract with one or more waste removal companies in compliance to (935 CMR 500.105 (L)) to provide the cultivation with an on-site waste refuse container, into which any responsible dispensary agent will deposit any cannabis that is not usable, as well as remove the contents of the on-site waste refuse container on a continuous basis and dispose of it as waste is customarily disposed of by waste removal companies.*

## **3. Designated Agent For Inventory Control**

*The Site(s) Operations Manager(s) will have oversight of, and maintain, their site's cannabis inventory control system.*

## **4. Methods of Acquiring Cannabis**

*The Dispensary will in general acquire cannabis from the Cultivation site, another dispensary or another dispensary's cultivation site. The Dispensary/Cultivation will not acquire cannabis from any other source.*

***Procedure:*** *The Dispensary/Cultivation will follow the methods listed below in the event of any acquisition or provision of cannabis or related products:*

- a. Acquiring cannabis from another dispensary or another dispensary's cultivation site:

After approval by the Dispensary General Manager or Director of Operations, all such acquisitions will take place either within the Dispensary building by physical delivery from a dispensary agent of another dispensary, or outside the Dispensary building (including within the building of another dispensary or another dispensary's cultivation site), if and only if, acquired by one of the Dispensary's dispensary agents and documented by a trip plan as required by the Commission's regulations. The Dispensary's General Manager or the Director of Operations will inspect and approve or reject all deliveries of cannabis into the Dispensary's building, whether from a dispensary agent of another dispensary or from the Dispensary's own dispensary agent bringing such acquisition into the Dispensary's building. The Dispensary will utilize its Flowhub inventory control system to document its acquisition of cannabis from a dispensary agent of another dispensary and will input all required information (see below) regarding such acquisition into the Flowhub system immediately upon receiving any cannabis into the Dispensary building and accepting such acquisition. The required information to be input by a dispensary agent upon any acquisition of cannabis from a dispensary agent of another dispensary will include:

1. A description of the cannabis acquired including the amount, strain, and batch number
2. The name and registry identification number of the dispensary and dispensary agent who provided the cannabis
3. The name and registry identification number of the dispensary agent receiving the cannabis on behalf of the dispensary
4. The date of acquisition.

b. Cannabis cultivated at the Cultivation site:

The Cultivation will utilize its METRC inventory control system to document its cultivation of cannabis at its cultivation site and will input all required information (see below) regarding such cultivation into the METRC system. The required information to be input by an agent pertaining to the cultivation of cannabis within the Cultivation site will include:

1. The batch number
2. Whether the batch originated from cannabis seeds or cuttings
3. The origin and strain of the cannabis seed or cutting planted
4. The number of cannabis seeds or cuttings planted
5. The date the cannabis seeds or cuttings were planted



6. A list of all chemical additives, including nonorganic pesticides, herbicides, and fertilizers used in the cultivation
7. Harvest information including the date of harvest, the final processed usable cannabis yield weight, the name and registry identification number of the dispensary agent responsible for the harvest
8. The disposal of cannabis that is not usable cannabis including the description of and reason for the cannabis being disposed of including, if applicable, the number of any failed or unusable plants; the date of disposal; the method of disposal; the name and registry identification number of the dispensary agent responsible for the disposal

c. Provision of cannabis to another dispensary:

After approval by the Dispensary's General Manager or the Director of Operations, all such provisions will take place either within the Dispensary building by physical retrieval from a dispensary agent of another dispensary, or outside the Dispensary building (including within the building of another dispensary or another dispensary's cultivation site), if and only if, delivered by one of the Dispensary's dispensary agents, physically retrieved by a dispensary agent of another dispensary, and documented by a trip plan as required by the Department's regulations. The Dispensary's General Manager or the Director of Operations will inspect and approve all provision of cannabis to another dispensary. The Dispensary will utilize its Flowhub inventory control system to document its provision of cannabis to a dispensary agent of another dispensary and will input all required information (see below) regarding such provision into the Flowhub system immediately upon releasing any cannabis from the Dispensary building. The required information to be input by a dispensary agent upon any provision of cannabis to a dispensary agent of another dispensary will include:

1. The amount, strain, and batch number of cannabis provided
2. The name and registry identification number of the other dispensary
3. The name and registry identification number of the dispensary agent who received the cannabis on behalf of the other dispensary
4. The date the cannabis was provided
5. The cannabinoid profile of the cannabis within the package, including THC and other cannabinoid levels

d. Receiving cannabis infused edible products from another dispensary:

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After approval by the Dispensary's General Manager or the Director of Operations, all such acquisitions will take place either within the Dispensary building by physical delivery from a dispensary agent of another dispensary, or outside the Dispensary building (including within the building of another dispensary or another dispensary's cultivation site), if and only if, acquired by one of the Dispensary's agents and documented by a trip plan as required by the Commission's regulations. The Dispensary's General Manager or the Director of Operations will inspect and approve or reject all deliveries of cannabis infused edible products into the Dispensary's building, whether from an agent of another dispensary or from the Dispensary's own agent bringing such acquisition into the Dispensary's building. The Dispensary will utilize its Flowhub inventory control system to document its acquisition of cannabis infused edible products from an agent of another dispensary and will input all required information (see below) regarding such acquisition into the Flowhub system immediately upon receiving any cannabis infused edible products into the Dispensary building and accepting such acquisition. The required information to be input by an agent upon any acquisition of cannabis infused edible products from an agent of another dispensary will include:

1. A description of the edible food products received from the dispensary including total weight of each edible food product and estimated amount and batch number of the cannabis infused in each edible product
2. Total estimated amount and batch number of cannabis infused in the edible food products
3. The name and registry identification number of the dispensary and the dispensary employee providing the edible food products to the receiving dispensary and dispensary agent receiving the edible food products on behalf of the receiving dispensary
4. The date the edible food products were provided to the Dispensary

### **F) Labeling of Marijuana and Marijuana Products.**

(a) Labeling of Marijuana Not Sold as a Marijuana Product. Prior to marijuana being sold or transferred we shall ensure the placement of a legible, firmly affixed label on which the wording is no less than 1/16 inch in size on each package of marijuana that it makes available for retail sale, containing at a minimum the following information:

Our name and registration number, together with the our business telephone number, electronic mail address, and website information, if any;

The quantity of usable marijuana contained within the package;

The date that the Marijuana Retailer or Marijuana Cultivator packaged the contents and a statement of which licensee performed the packaging;

A batch number, sequential serial number, and bar code when used, to identify the batch associated with manufacturing and processing;

The full cannabinoid profile of the marijuana contained within the package, including THC and other cannabinoid level;

A statement and a seal certifying that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15;

This statement, including capitalization: “This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN.”;

The following symbol or easily recognizable mark issued that indicates the package contains marijuana

by the Commission product:



The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:



(b) Labeling of Edible Marijuana Infused Products. Prior to edible marijuana products being sold or transferred, we shall place a legible, firmly affixed label on which the wording is no less than  $\frac{1}{16}$  inch in size on each edible marijuana product that it prepares for retail sale or wholesale, containing at a minimum the following information:

1. Our name and registration number, together with our business telephone number, e-mail address, and website information, if any;

The name of the marijuana product;

Refrigeration of the product is required, as applicable;

Net weight or volume in US customary and metric units;

The quantity of usable marijuana contained within the product as measured in ounces;

The type of marijuana used to produce the product, including what, if any, processing technique or solvents were used;

A list of ingredients, including the full cannabinoid profile of the marijuana contained within the Marijuana Product, including the amount of delta-nine-tetrahydrocannabinol (9-THC) and other

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cannabinoids in the package and in each serving of a marijuana product as expressed in absolute terms and as a percentage of volume;

The serving size of the marijuana product in milligrams if the package is a multiple-serving package;

The number of serving sizes within the marijuana product based on the limits provided in 935 CMR 500.150;

The amount, in grams, of sodium, sugar, carbohydrates and total fat per serving;

The date of creation and the recommended “use by” or expiration date which shall not be altered or changed;

A batch number, sequential serial number and bar codes when used, to identify the batch associated with manufacturing and processing;

Directions for use of the marijuana product if relevant;

A statement and a seal that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15;

A warning if nuts or other known allergens are contained in the product;

This statement, including capitalization: “The impairment effects of edible products may be delayed by two hours or more. This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN”;

The following symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana product:



The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:



(c) Labeling of Marijuana Concentrates and Extracts. Prior to marijuana concentrates or extracts being sold or transferred, we shall place a legible,

firmly affixed label on which the wording is no less than 1/16 inch in size on each marijuana concentrate container that it prepares for retail sale or wholesale, containing at a minimum the following information:

The name and registration number of the product manufacturer that produced the marijuana product, together with the product manufacturer's business telephone number, e-mail address, and website information, if any;

The name of the marijuana product;

Product identity including the word "concentrate" or "extract" as applicable;

Net weight of volume expressed in US customary units and metric units;

The type of marijuana used to produce the product, including what, if any, processing technique or solvents were used;

A list of ingredients, including the full *Cannabinoid* profile of the marijuana contained within the Marijuana Product, including the amount of delta-ninetetrahydrocannabinol (9-THC) and other cannabinoids in the package and in each serving of a Marijuana Product as expressed in absolute terms and as a percentage of volume;

A statement of the serving size and number of servings per container or amount suggested for use based on the limits provided in 935 CMR 500.150;

The date of creation and the recommended "use by" or expiration date;

A batch number, sequential serial number, and bar code when used, to identify the batch associated with manufacturing and processing;

Directions for use of the marijuana product if relevant;

A statement and a seal that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15;

A warning if nuts or other known allergens are contained in the product;

This statement, including capitalization: "This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN.";

The following symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana product:



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The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:



(d) Labeling of Marijuana Infused Tinctures and Topicals. Prior to marijuana infused tinctures or topicals being sold or transferred the Marijuana Product Manufacturer shall place a legible, firmly affixed label on which the wording is no less than 1/16 inch in size on each container of marijuana infused tincture or topical that it prepares for retail sale or wholesale, containing at a minimum the following information:

1. Our name and registration number, together with our business telephone number, e-mail address, and website information, if any;

The marijuana product's identity;

The type of marijuana used to produce the product, including what, if any, processing technique or solvents were used;

A list of ingredients, including the full Cannabinoid profile of the marijuana contained within the Marijuana Product, including the amount of delta-ninetetrahydrocannabinol (9-THC) and other cannabinoids in the package and in each serving of a Marijuana Product as expressed in absolute terms and as a percentage of volume;

Net weight or volume as expressed in US customary units or metric units;

The date of product creation;

A batch number, sequential serial number, and bar code when used, to identify the batch associated with manufacturing and processing;

Directions for use of the marijuana product if relevant;

A statement and a seal that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15;

A warning if nuts or other known allergens are contained in the product;

This statement, including capitalization: "This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN.";

The following symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana product:



The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:



(e) In circumstances where the labeling of the marijuana product is unreasonable or impractical, we may include the labeling information on a peel-back label or may place the product in a sealed bag with an insert or additional, easily readable label firmly affixed to that bag.

**G) Packaging/Storage (935CMR 500.105)**

*The Dispensary will package the great majority of its cannabis, and infuse and package all of its edibles, concentrates, at the cultivation site. After the opening of the Companies Cultivation site and on an ongoing basis, a large percentage of the Dispensary's cannabis will be packaged and stored in a safe room at the Companies Cultivation building in compliance to 935 CMR 500.110 (G)(I)(C)). With the exception of bulk packaged cannabis that will be transferred directly from the Companies Cultivation site to another dispensary or another dispensary's cultivation site, all usable cannabis cultivated at the Companies Cultivation site will be packaged and sealed in the exact amounts that it will be sold at the Dispensary's building (grams, fractions of ounces and full ounces). For the percentage of the Dispensary's cannabis that will be packaged at the Dispensary building, all such cannabis will be visually inspected and weighed in bulk by the General Manager to ensure the integrity of the cannabis in terms of strain, content, and amount. Thereafter, such cannabis will be broken down into smaller amounts (grams, fractions of ounces and ounces) and weighed to confirm weight accuracy. The cannabis will then be packaged and sealed into plastic bags of differing sizes that are transparent on one side, using a heat iron or packed into high-quality glass containers with a rubber air-tight seal around the circular opening of such glass containers. The cannabis will then be labeled with the required labeling information (see below). All handling of cannabis throughout the acquisition, inspection, weighing, packaging and labeling process will be done by the Dispensary's agents under strict cleanliness, security and sanitary controls as required by the Commission's regulations (105 CMR 300.000). All labels affixed to the Dispensary's packaged cannabis will be placed either on the outside of the plastic bags or the glass container. The information on all such labels will include:*

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- a. For all cannabis provided by the Dispensary to another Dispensary, the Dispensary will ensure that such cannabis is labeled with:
  1. The Dispensary's registry identification number
  2. The amount, strain, and batch number of marijuana
  3. The date of harvest or sale
  4. A list of all chemical additives, including nonorganic pesticides, herbicides, and fertilizers, used in the cultivation and production of the Cannabis

### Packaging of Marijuana and Marijuana Products.

(a) Tamper or Child-resistant Packaging. We shall ensure that all marijuana products, other than those offered at wholesale by our sites, that are provided for sale to consumers we shall sell in tamper or child-resistant packaging. To be in compliance with 935 CMR 500.105(6), we shall ensure:

1. That to the extent it is not unreasonably impracticable for the specific type of product, marijuana products are packaged in containers that are
  - a. opaque or plain in design;
  - b. resealable for any marijuana product intended for more than a single use or containing multiple servings; and
  - c. certified by a qualified third-party tamper or child-resistant packaging testing firm that the packaging is in compliance with the most recent poison prevention packaging regulations of the US Consumer Product Safety Commission as included

at 16 CFR

1700

2. That where compliance with the requirements of tamper or child-resistant packaging is deemed to be unreasonably impracticable, marijuana products shall be placed in an exit package that is:

- a. capable of being resealed and made tamper or child-resistant resistant again after it has been opened;
- b. includes the following statement, including capitalization, in at least ten-point Times New Roman, Helvetica or Arial font: KEEP OUT OF REACH OF CHILDREN;

and

- c. is certified by a qualified third-party tamper or child-resistant packaging testing firm that the packaging is in compliance with the most recent poison prevention regulations of the US Consumer Product Safety Commission as

packaging

included at 16 CFR 1700.

### (b) Limits on Packaging Design.

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Packaging for marijuana products sold or displayed for consumers, including any label or imprint affixed to any packaging containing marijuana products or any exit packages, shall not be attractive minors.

Packaging is explicitly prohibited from:

- using bright colors, defined as colors that are “neon” in appearance;
- imitating or having a semblance to any existing branded consumer products, including foods and beverages, that do not contain marijuana;
- featuring cartoons;
- featuring a design, brand or name that resembles a non-cannabis consumer product of the type that is typically marketed to minors;
- featuring symbols or celebrities that are commonly used to market products to minors;
- featuring images of minors; or
- featuring words that refer to products that are commonly associated with minors or marketed to minors.

(c) Packaging of Multiple Servings.

1. Packaging for marijuana products sold or displayed for consumers in multiple servings shall include the following statement on the exterior of the package in a printed font that is no smaller than ten-point Times New Roman, Helvetica or Arial, including capitalization: “INCLUDES MULTIPLE SERVINGS.”

2. Packaging for marijuana products in solid form sold or displayed for consumers in multiple servings shall allow a consumer to easily perform the division into single servings.

a. Edible marijuana products in a solid form shall be easily and permanently scored to identify individual servings.

b. Notwithstanding 935 CMR 500.105(6)(c)2.a., where a product is unable, because of its form, to be easily and permanently scored to identify individual servings, the product shall be packaged in a single serving size. The determination of whether a product is able to be easily and permanently scored shall be decided by the Commission consistent with sub-regulatory guidelines established by the Commission and provided to licensees.

3. Packaging for marijuana product beverages shall be packages solely in a single serving size. Multiple serving beverages are strictly prohibited for sale.

(a) Each single serving of an edible marijuana product contained in a multiple-serving package shall be marked, stamped or otherwise imprinted with the symbol issued by the Commission under 935 CMR 500.105(5) that indicates that the single serving is a marijuana product.

(b) Serving size shall be determined by the processor but in no instance shall an individual serving size of any marijuana product contain more than five milligrams of delta-ninetetrahydrocannabinol (9-THC).

### **H) Audits**

*The Site's Director of Operations will have oversight of the Companies inventory control and will conduct and document an audit of the companies inventory that is accounted for according to generally accepted accounting principles at least once every 30 calendar days. The Director of Operations will perform any audit by using reports generated from the Flowhub inventory control system that indicate the companies current inventory and comparing such reports to the individual site's actual physical inventory, which the Director of Operations will tally by physically counting the inventory and manually recording the totals. If a periodic inventory audit identifies a reduction in the amount of cannabis in the cultivation's inventory not due to documented causes, the Director of Operations will determine where the loss occurred and take and document corrective action using the Loss or Theft Report Form attached as Exhibit H. If any reduction in the amount of cannabis in the Site(s) inventory is due to suspected criminal activity by a dispensary agent, the Site(s) will report the dispensary agent to the Commission and to local law enforcement authorities and take and document corrective action using the Loss or Theft Report Form attached as Exhibit H.*

### **I) General**

#### **1. Posting of Required Information**

*The Company will post the following information in a place that can be viewed by the individuals entering any site:*

- a. *The Site's approval to operate;*
- b. *The Site's registration certificate;*
- c. *A list of all Board Members & Executives of 253 Organics and members will be made available upon request by an individual.*
- d. *After hours contact information is the Director, Seth Rutherford 508-367-7679*

#### **2. Renewable Energy**

*All 253 sites will be purchasing renewable energy from the local utility company. We will also be configuring our lighting system to 480V using CMH technology. This reduces the current load by 65% compared to common practices in other Marijuana sites.*

### **3. Emergency Protocol**

*In the event of an emergency all employees are directed to immediately vacate the premise using the designated emergency exits.*

*The Director of Operations shall ensure that all postings are in place at all times during the Cultivation/Retail/Manufacturing operating hours and will conduct annual emergency drills.*

### **4. Policy and procedure Review**

*The Company will review its policies and procedures at least once every 12 months from the issue date of its Site's registration certificate and update as needed. The Company will ensure that all policies and procedures maintained for inspection are the most recent versions with all revisions incorporated therein. The Company will use the Policies and Procedures Review Log attached as Exhibit I, which will be kept in a binder containing all policies and procedures in hard copy, available for inspection in the reception area of the cultivation/dispensary buildings in order to ensure timely review of its policies and procedures.*

## **J) Cleaning /Sanitation / Quality Control**

### **1. Maintenance of Dispensary/Cultivation Building and Equipment**

*The Cultivation/MFG will ensure that any building or equipment used by the Cultivation for the cultivation, harvest, preparation, packaging, storage, infusion, or sale of cannabis is maintained in a clean and sanitary condition. The Site's will maintain and enforce a routine cleaning schedule to ensure that the buildings and all equipment is maintained in a clean and sanitary condition.*

### **2. Quality Control/Protection of Cannabis (935 CMR 500.000)**

*The Cultivation/MFG site will ensure that cannabis in the process of production, preparation, manufacture, packing, storage, sale, distribution, or transportation is protected from flies, dust, dirt, and all other contamination. In addition to the use of sealed containers, the Cultivation will routinely test samples of cannabis in its possession for any contaminants listed above in addition to THC and cannabinoid profiles. In the event any such contaminants are detected, the cannabis will be disposed of in accordance to the policies and procedures herein.*

### **3. Removal of Refuse or Waste ( 500.105 (L))**

*The Company will ensure that refuse or waste products incident to the manufacture, preparation, packing, selling, distributing, or transportation of cannabis are removed from the buildings used at a site at least once every 24 hours or more often as necessary to maintain a clean condition. The Site's will develop and implement a plan for removal of refuse and waste approved by the Commission . The Site's will ensure that various agents will share the responsibility of removing refuse or waste each night before closing, and when necessary. Cannabis remnants or by-products shall be disposed of according to an approved plan and not placed within the facility's exterior refuse container.*

### **4. Cleaning of Equipment**

*The Cultivation will ensure that all trucks, trays, buckets, other receptacles, platforms, racks, tables, shelves, knives, saws, cleavers, other utensils, or the machinery used in moving, handling, cutting, chopping, mixing, canning, packaging, or other processes are cleaned daily. The Cultivation will ensure that various agents will share the responsibility of cleaning equipment each night before closing, and when necessary.*

### **5. Protection of Edibles**

*The cultivation/kitchen will ensure that, if applicable, all edible foods are securely covered. The cultivation/kitchen will ensure that all edibles are properly packaged and kept in a secure manner to prevent airborne or contact contamination. All edible products shall be prepared, handled, and stored in compliance to sanitation requirements in 105 CMR 500.000 and “Good Manufacturing Practices for Food”, and with the requirements for food handlers specified in 105 CMR 300.000*

### **6. Agent Hand Cleansing**

*The Cultivation will ensure that while in the Cultivation site, an agent will clean their hands and exposed portions of their arms in a hand washing sink:*

1. *Before preparing cannabis including working with food, equipment, and utensils;*
2. *During preparation, as often as necessary to remove soil and contamination and to prevent cross-contamination when changing tasks;*
3. *After handling soiled equipment or utensils;*
4. *After touching bare human body parts other than the dispensary employee's clean hands and exposed portions of arms; and*
5. *After using the toilet room.*

## **7. Agent Hygiene**

*The Site's will ensure that while in the site, if working directly with the preparation of cannabis or the infusion of cannabis into non-edible products, an agent employee will:*

1. *Keep fingernails trimmed, filed, and maintained so that the edges and surfaces are cleanable;*
2. *Unless wearing intact gloves in good repair, not have fingernail polish or artificial fingernails on the agent's fingernails; and*
3. *Wear protective apparel such as coats, aprons, gowns, or gloves to prevent contamination.*

## **8. Dispensary Employee Clothing**

*The Cultivation will ensure that while in the Cultivation site, an agent will wear clean clothing appropriate to assigned tasks.*

## **9. Reporting of Adverse Health Conditions**

*The Company will ensure that while in any site, an agent will report to the Director of Operations any health condition experienced by the agent that may adversely affect the safety or quality of any cannabis with which the agent may come into contact. The Company will ensure that all agents receive appropriate training regarding reporting adverse health conditions that the policy regarding reporting is enforced.*

### 10. Determination of Adverse Health Condition

*If the Director of Operations determines that an agent has a health condition that may adversely affect the safety or quality of the cannabis and, the Site(s) will prohibit the agent from direct contact with any cannabis or equipment or materials for processing cannabis until determined that the employee's health condition will not adversely affect the cannabis. The Company will ensure that all agents receive appropriate training regarding reporting adverse health conditions and that the policy regarding reporting is enforced.*

### K) Agent Registry Identification Card and Requirements

#### 1. Possession of Agent Registry Identification Card

*The Company will ensure that each site has the agent's registry identification card in the agent's immediate possession when the agent:*

- 1. Is working at the any site, or*
- 2. Is transporting cannabis for the Dispensary/Cultivation.*

***Procedure:*** *No agent shall enter the Dispensary/Cultivation sites without first showing his/her agent registry identification card to the agent overseeing access and proving that he/she is in actual possession of the registry identification card. The Director of Operations will periodically check with agents within the Dispensary/Cultivation building to verify that agents have their registry identification cards in their immediate possession.*

#### 2. Agent Accompaniment/Diversion

*The Site's will ensure that an agent accompanies any individual other than another company agent associated with the Site's when the individual is present in the enclosed, locked facility where cannabis is cultivated or processed.*

***Procedure:*** *Access to the Companies sites by individuals other than agents shall be supervised by the Director of Operations according to the following:*

- α. The Director of Operations must approve the entrance of any individual other than an authorized company agent into the Cultivation site.*
- β. Upon approval by the Director of Operations, an individual will be required to sign a logbook registering both the time in and the time out of the Cultivation site.*

*χ. The Director of Operations will assign an agent to accompany the individual at all times that the individual is within the site.*

*δ. The Director of Operations will ensure that upon exiting the Cultivation site, an accompanied individual will not have removed any cannabis or related products from the Cultivation site.*

### **3. Agent Registry Identification Card Requirement (500.030)**

*The Company will not allow an individual who does not possess an agent registry identification card issued under the appropriate Site(s) registration certificate to:*

- 1. Serve as a principal officer or board member for the Company;*
- 2. Be employed by the Company*

***Procedure:*** *Prior to opening, the Company will ensure that all above-listed individuals have received an agent registry identification card. Any above-listed individual that does not obtain such a card will not be permitted to: be in the Dispensary building, cultivation site, extraction or kitchen, serve as a principal officer or board member for the Company, or be employed by the Company.*

### **4. Notice of a Site's Agent Termination**

*The Company will provide written notice to the Commission, including the date of the event within ten working days after the date, when a site agent no longer:*

- 1. Serves as a principal officer or board member for the Company;*
- 2. Is employed by the Dispensary, cultivation, extraction or kitchen;*

***Procedure:*** *The Company will maintain an automatic notification system for renewals of registry identification cards and ensure that all renewals are achieved prior to the expiration of any registry identification card for any of the individuals listed above. In the event that a site's agent changes status as described above, the Company will ensure that the Commission is immediately notified and it shall be the responsibility of the Director of Operations to do so.*

## **L) Physical Plant and Requirements of Dispensary and Cultivation/MFG Location**

### **1. 1000 Feet From School ( Note: per federal guidelines)**

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*The Dispensary and its cultivation site are (and will always be) located at least 1000 feet from a private school or a public school that existed before the date the Dispensary or Cultivation submitted its initial dispensary registration certificate application.*

### **2. Parking**

*The Dispensary/Cultivation/Kitchen has onsite parking and parking adjacent to the Dispensary/Cultivation/Kitchen buildings.*

### **3. Facility Amenities**

*The Dispensary and its Cultivation/MFG sites have:*

- 1. At least one toilet room;*
- 2. Each toilet room shall contain:*
  - a. A flushable toilet;*
  - b. Mounted toilet tissue;*
  - c. A sink with running water;*
  - d. Soap contained in a dispenser; and*
  - e. Disposable, single-use paper towels in a mounted dispenser or a mechanical air hand dryer;*
- 3. At least one hand washing sink not located in a toilet room;*
- 4. Designated storage areas for cannabis or materials used in direct contact with cannabis separate from storage areas for toxic or flammable materials; and*
- 5. If preparation or packaging of medical marijuana is done in the building, a designated area for the preparation or packaging that:*
  - a. Includes work space that can be sanitized, and*
  - b. Is only used for the preparation or packaging of cannabis*

### **4. Commercial Weighing Devices**



*For each commercial device used at the Dispensary/Cultivation site, it will:*

- 1. Ensure that the commercial device is licensed and certified.*
- 2. Maintain documentation of the commercial device's license or certification, and*
- 3. Provide a copy of the commercial device's license or certification to the Commission for review upon request.*

## **5. Maintenance of a Single, Secure Entrance**

*The Dispensary and Cultivation sites will have a single secure entrance. Through the use of a single, secure entrance into the site's building, the site's will implement appropriate security measures to deter and prevent the theft of cannabis and unauthorized entrance into areas containing cannabis.*

## **6. Prohibition Against On-Site Consumption**

*The Company will not permit any person to consume cannabis on the property of the Site's. The Company will require that all employees sign a form stating that they understand the relevant policies and procedures and agree to abide by them, including the prohibition of consuming cannabis on the property of any site. The Site's will post signs inside the buildings and enforce the policy.*

## **M) Security (935 CMR 500.110)**

### **1. Limited Access**

*The Company will restrict access to the areas of the Dispensary/Cultivation site that contain cannabis and at the kitchen/extraction site, to authorized individuals only. No persons under the age of 21 are allowed into the body of the Cultivation, Dispensary, Kitchen, Extraction, not including the waiting room.*

***Procedure:*** *Access to Cultivation, Dispensary, MFG other than company agents shall be supervised by the Director of Operations according to the following:*

ε. *The Director of Operations must approve the entrance of any individual other than an authorized agent into any site.*

φ. *Upon approval by the Director of Operations, an individual will be required to sign a logbook registering both the time in and the time out of the site.*

γ. *The Director of Operations will assign an agent to accompany the individual at all times that the individual is within the site.*

η. The Director of Operations will ensure that upon exiting the Cultivation site, an accompanied individual will not have removed any cannabis or related products from the site.

a. Unauthorized Access

*To prevent unauthorized access to cannabis at the Companies buildings, the buildings have security equipment to deter and prevent unauthorized entrance into limited access areas that includes devices or a series of devices to detect unauthorized intrusion, which may include a signal system interconnected with a radio frequency method, such as cellular, private radio signals, or other mechanical or electronic device. In addition, a burglar alarm shall be installed that will activate upon motion via entrance through the doors, glass, rooftop access and cover any shared wall. The alarm shall be monitored by an alarm company.*

b. Identification

*The Company will provide for the accurate and continuous identification of individuals authorized to enter the Site's.*

c. Security Equipment

*The Company has security equipment to deter and prevent unauthorized entrance into limited access areas that includes devices or a series of devices to detect unauthorized intrusion, which may include a signal system interconnected with a radio frequency method, such as cellular, private radio signals, or other mechanical or electronic device. In addition, a burglar alarm shall be installed that will activate upon motion via entrance through the doors, glass, rooftop access and cover any shared wall. The alarm shall be monitored by an alarm company.*

c.i. Intrusion Detection

*The Company will comply with all Commission and City rules and regulations with regard to mandatory security and monitoring devices to prevent and detect unauthorized intrusion into the cultivation/dispensary building. The Company will contract with a security and alarm monitoring company to conduct in-person and remote surveillance of the cultivation/dispensary buildings on a 24/7 basis. In addition, during business hours, the Operations Manager will ensure that all electronically restricted access controlled doors are properly secured and set to alarm as a result of any unauthorized intrusion. During non-business hours, the Director of Operations will ensure that the security system is armed and operational by securing all interior doors, electronically restricted access doors, and the exterior door and setting the security system by way of a confidential access code.*

c.ii.Exterior Lighting

*To prevent unauthorized access to cannabis at any location around or in the buildings, the Company has security equipment to deter and prevent unauthorized entrance into limited access areas that includes exterior lighting to facilitate surveillance.*

***Procedure:*** *At a minimum, the Site's shall maintain lighting to provide a minimum of 2-foot candles of light throughout all parking lots and the exterior entrance of the Dispensary/Cultivation building. The Director of Operations will ensure that all such lights are properly working at all times.*

c.iii.Electronic Monitoring

*The Company will conduct electronic monitoring both in and around its site. The Company will conduct electronic video monitoring of all visitors in the parking lot and in the entry area of the Building site.*

***Procedure:*** *All customers entering the Cultivation shall remove their hats, sunglasses, and other similar objects, which obstruct physical identification. This shall not apply to clothing worn over the face for established religious reasons. At all times during business hours, at least one site agent within the site will be tasked with monitoring the electronic video monitoring systems and responding to any issues of security or safety that may arise. To prevent unauthorized access to cannabis at the site, the site has security equipment to deter and prevent unauthorized entrance into limited access areas that includes electronic video and visual monitoring, including but not limited to:*

1. At least one 19 inch or greater call-up monitor;
2. A video printer capable of immediately producing a clear still photo from any video camera image;
3. Video cameras that: (1) Provide coverage of all entrances to and exits from limited access areas and all entrances to and exits from the building, capable of identifying any activity occurring in or adjacent to the building; and (2) Have a recording resolution of least at 704 x 480 or the equivalent;
4. A video camera in each grow room capable of identifying any activity occurring within the grow room in low light conditions;
5. Storage of video recordings from the video cameras for at least 90 calendar days;
6. A failure notification system that provides an audible and visual notification of any failure in the electronic monitoring system; and

7. Sufficient battery backup for video cameras and recording equipment to support at least five minutes of recording in the event of a power outage.

*The Director of Operations will be responsible for ensuring that all electronic video and visual monitoring security equipment is properly functioning at all times.*

c.iv.Panic Buttons

*The Company will install and maintain working panic buttons in the interior of the Cultivation/Dispensary sites. All agents at the site will have access to and be made aware of the location of multiple panic buttons throughout the sites.*

***Procedure:*** *All Company employees will be trained on the specific location of panic buttons and the specific circumstances under which panic buttons should be used, including disorderly conduct, criminal invasion, and other security emergencies. The Director of Operations will ensure that all interior panic buttons are properly functioning at all times.*

d. Loitering

*The Company will provide for the accurate and continuous identification of individuals authorized to enter any site.*

***Procedure:*** *The Dispensary/Cultivation site's will periodically monitor the public areas around the building site to ensure no loitering is taking place and escort individuals away from the public areas around the buildings in the event that any loitering occurs.*

### **N) Transportation**

#### Transportation Between Marijuana Establishments.

(a) General Requirements.

253 shall, as an element of its license, be licensed to transport its marijuana products to other licensed establishments, except as otherwise provided herein.

Marijuana products will only be transported between licensed Marijuana Establishments by registered marijuana establishment agents.

The originating and receiving licensed Marijuana Establishments shall ensure that all transported marijuana products are linked to the seed-to-sale tracking program. For the purposes of tracking, seeds and clones will be properly tracked and labeled in a form and manner determined by the Commission.

Any marijuana product that is undeliverable or is refused by the destination Marijuana Establishment shall be transported back to the originating establishment.

All vehicles transporting marijuana products shall be staffed with a minimum of two marijuana establishment agents. At least one agent shall remain with the vehicle at all times that the vehicle contains marijuana or marijuana products.

Prior to leaving a Marijuana Establishment for the purpose of transporting marijuana products, the originating Marijuana Establishment must weigh, inventory, and account for, on video, all marijuana products to be transported.

Within eight hours after arrival at the destination Marijuana Establishment, the destination establishment must re-weigh, re-inventory, and account for, on video, all marijuana products transported.

When videotaping the weighing, inventorying, and accounting of marijuana products before transportation or after receipt, the video will show each product being weighed, the weight, and the manifest.

Marijuana products will be packaged in sealed, labeled, and tamper or child-resistant packaging prior to and during transportation.

In the case of an emergency stop during the transportation of marijuana products, a log will be maintained describing the reason for the stop, the duration, the location, and any activities of personnel exiting the vehicle.

We shall ensure that all transportation times and routes are randomized.

When transporting marijuana products we shall ensure that all transport routes remain within the Commonwealth.

All vehicles and transportation equipment used in the transportation of cannabis products or edibles requiring temperature control for safety must be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the cannabis products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c).

(b) Reporting Requirements.

Marijuana establishment agents must document and report any unusual discrepancy in weight or inventory to the Commission and law enforcement authorities not more than 24 hours of the discovery of such a discrepancy.

Marijuana establishment agents shall report to the Commission and law enforcement authorities any vehicle accidents, diversions, losses, or other reportable incidents that occur during transport, not more than 24 hours of such accidents, diversions, losses, or other reportable incidents.

(c) Vehicles.

1. Our vehicle used for transporting marijuana products will be:

- a. owned or leased by the 253 Organics;
- b. properly registered, inspected, and insured in the Commonwealth (documentation of such status shall be maintained as records of 253 Organics, and shall be made available to the Commission upon request);
- c. equipped with an alarm system approved by the Commission; and

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- d. equipped with functioning heating and air conditioning systems appropriate for maintaining correct temperatures for storage of marijuana products.

Marijuana products will not be visible from outside the vehicle.

Any vehicle used to transport marijuana products shall not bear any markings indicating that the vehicle is being used to transport marijuana products, and any such vehicle shall not indicate our name.

When transporting marijuana products, no other products may be transported or stored in the same vehicle.

No firearms may be located within the vehicle or on a 253 agent.

### (d) Storage Requirements.

Marijuana products will be transported in a secure, locked storage compartment that is a part of the vehicle transporting the marijuana products.

The storage compartment will be sufficiently secure that it cannot be easily removed.

If we are transporting marijuana products for more than one Marijuana Establishment at a time, the marijuana products for each Marijuana Establishment shall be kept in a separate locked storage compartment during transportation and separate manifests shall be maintained for each Marijuana Establishment.

If we are transporting marijuana products to multiple other establishments, it may seek the Commission's permission to adopt reasonable alternative safeguards.

### (e) Communications.

1. Any of our vehicles used to transport marijuana products shall contain a global positioning system (GPS) monitoring device that is:

- a. not a mobile device that is easily removable;
- b. attached to the vehicle at all times that the vehicle contains marijuana products;
- c. monitored by the Marijuana Establishment or Marijuana Transporter during transport of marijuana products; and
- d. inspected by the Commission prior to initial transportation of marijuana products, and after any alteration to the locked storage compartment.

2. Each 253 agent transporting marijuana products shall have access to a secure form of communication with personnel at the originating location at all times that the vehicle contains marijuana and marijuana products.

3. Secure types of communication include, but are not limited to:

- a. two-way digital or analog radio (UHF or VHF);
- b. cellular phone; or
- c. satellite phone.

4. When choosing a type of secure communications, the following shall be taken into consideration:
  - a. cellular signal coverage;
  - b. transportation area;
  - c. base capabilities;
  - d. antenna coverage; and
  - e. frequency of transportation.
5. Prior to, and immediately after leaving the originating location, the marijuana establishment agents shall use the secure form of communication to contact the originating location to test communications and GPS operability.
6. If communications or the GPS system fail while on route, our agents transporting marijuana products must return to the originating location until the communication system or GPS system is operational.
7. Our agents transporting marijuana products shall contact the originating location when stopping at and leaving any scheduled location, and regularly throughout the trip, at least every 30 minutes.
8. The originating location must have a marijuana establishment agent assigned to monitoring the GPS unit and secure form of communication, who must log all official communications with marijuana establishment agents transporting marijuana products.

(f) Manifests.

A manifest shall be filled out in triplicate generated from METRC, with the original manifest remaining with the originating Marijuana Establishment, a second copy provide to the destination Marijuana Establishment upon arrival, and a copy to be kept with the licensed marijuana establishment agent during transportation and returned to the Marijuana Establishment or Marijuana Transporter upon completion of the transportation.

Prior to transport, the manifest shall be securely transmitted to the destination Marijuana Establishment by facsimile or email.

Upon arrival at the destination Marijuana Establishment, a marijuana establishment agent at the destination Marijuana Establishment shall compare the manifest produced by the agents who transported the marijuana products to the copy transmitted by facsimile or email. This manifest must, at a minimum, include;

- a. the originating Marijuana Establishment name, address, and registration number;
- b. the names and registration numbers of the agents who transported the marijuana products;
- c. the name and registration number of the marijuana establishment agent who prepared the manifest;
- d. the destination Marijuana Establishment name, address, and registration number;
- e. a description of the marijuana products being transported, including the weight and form or type of product;
- f. the mileage of the transporting vehicle at departure from originating Marijuana Establishment and mileage upon arrival at destination Marijuana Establishment, as well as mileage upon return to originating Marijuana Establishment;

## 253 Organic, LLC Management Operations and Policies

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- g. the date and time of departure from originating Marijuana Establishment and arrival at destination Marijuana Establishment for each transportation;
- i. a signature line for the marijuana establishment agent who receives the marijuana products;
- j. the weight and inventory before departure and upon receipt;
- k. the date and time that the transported products were re-weighed and re-inventoried;
- l. the name of the marijuana establishment agent at the destination Marijuana Establishment who re-weighed and re-inventoried products; and
- m. the vehicle make, model, and license plate number.

The manifest shall be maintained within the vehicle during the entire transportation process, until the delivery is completed.

We shall retain all transportation manifests for no less than one year and make them available to the Commission upon request.

(g) Requirements for Agents.

Our agent shall carry his or her registration card at all times when transporting marijuana products, and shall produce his or her registration card to the Commission or law enforcement officials upon request.

(h) Access to the Commission, Emergency Responders and Law Enforcement.

The following individuals shall have access to our Licensed facilities:

Representatives of the Commission in the course of responsibilities authorized by St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000; Representatives of other state agencies of the Commonwealth; and Emergency responders in the course of responding to an emergency.

(i) Trip Plans

*The Cultivation/MFG sites will ensure that company employees will be the only individuals permitted to transport cannabis, cannabis plants, between the Dispensary and the Dispensary's Cultivation site or another dispensary. In all such instances, the Cultivation will complete a trip plan, compliant with the requirements below.*

1. Contents

*If the cultivation and/or mfg transports cannabis, cannabis plants, as shown above, before transportation, the responsible agent will complete a trip plan that includes:*

- a. The name of the agents (two required) in charge of transporting the *cannabis*;
- b. The date and start time of the trip;



- c. A description of the *cannabis*, *cannabis* plants being transported; and
- d. The anticipated route of transportation
- e. Manifest created from METRC

***Procedure:*** The cultivation and/or kitchen/extraction will utilize the Trip Plan Form attached as Exhibit J that requests and requires entry of the data listed above. The Director of Operations designated dispensary agent will prepare a Trip Plan Form including each of the data items listed above. The Director of Operations or designated agent will retain one copy for filing with the cultivation and provide the second copy to the agent transporting any products.

## 2. Agent Responsibilities

*In addition to the responsibilities of an agent regarding the completion of the Trip Plan Form, the responsible agent will also enter the end time of the trip and any changes to the trip plan and provide a final copy of the trip plan to the Dispensary. The Dispensary will retain the final copy of the trip plan in electronic form at the Dispensary building. Any agent transporting cannabis will follow the procedures set forth below.*

***Procedure:*** The cultivation and/or kitchen will retain the electronic copy of the trip plan filed prior to transportation at the Cultivation building. During transportation, the agent will in addition:

- a. Carry a copy of the trip plan on the agent's person for the duration of the trip;
- b. Use a vehicle without any cannabis identification;
- c. Ensure that the dispensary agent has a means of communication with the Dispensary; and
- d. Ensure that the *cannabis*, *cannabis* plants, are not visible.
- e. Ensure that all traffic laws are followed.
- f. Ensure compliance with all other items on the Dispensaries internal transport checklist.
- g. Manifest created from METRC

### 3. Record Retention

*The Dispensary/Cultivation sites will maintain all trip plans described above at the Dispensary/Cultivation sites in compliance with the Document Retention Policy attached as Exhibit F for at least five years from the date of the filing of the trip plan and, upon request, provide a copy of any trip plans to the Department for review. The Dispensary/Cultivation sites will maintain all trip plans in electronic form at the Dispensary building. The Director of Operations will be responsible for ensuring that trip plans are accounted for and accurate. The trip plans will be stored within the companies electronic servers.*

### **O) Additional Retail Procedures;**

#### *(1) On-premises Verification of Identification for Adult Use Only Locations.*

Upon entry into the premises of a Marijuana Retailer by an individual, a marijuana establishment agent shall immediately inspect the individual's proof of identification and determine the individual's age. An individual shall not be admitted to the premises unless the retailer has verified that the individual is 21 years of age or older by an individual's proof of identification.

#### On-premises Verification of Identification.

Upon entry into our Retail location by an individual, a marijuana our agent shall immediately inspect the individual's proof of identification and determine that the individual is 21 years of age or older. If the individual is younger than 21 years old but 18 years of age or older, he or she shall not be admitted.

Limitation on Sales. In accordance with M.G.L. c. 94G, § 7, we will not sell more than one ounce of marijuana or five grams of marijuana concentrate to a consumer per transaction.

#### Unauthorized Sales and Right to Refuse Sales.

We shall refuse to sell marijuana to any consumer who is unable to produce valid proof of identification.

We may refuse to sell marijuana products to a consumer if, in the opinion of our agent based on the information available to the agent at that time, the consumer or the public would be placed at risk.

We shall not sell to an individual more than one ounce of marijuana or five grams of marijuana concentrate per transaction.

We will not marijuana products containing nicotine.

We will not sell marijuana products containing alcohol, if sales of such alcohol would require licensure pursuant to M.G.L. c. 138.

Recording Sales.

We shall only utilize a point-of-sale (POS) system approved by the Commission, in consultation with the DOR. **We plan to use the Flowhub POS system which is compatible with the METRC inventory system for daily uploads of inventory and sales.**

We will utilize a sales recording module approved by the DOR.

We will not be utilizing software or other methods to manipulate or alter sales data.

We shall conduct a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. We shall maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If we determine that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data:

- we shall immediately disclose the information to the Commission;

- we shall cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and

- take such other action directed by the Commission to comply with 935 CMR 500.105.

We shall comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding record keeping requirements. Reference our record retention policy

We shall adopt separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales.

Consumer Education;

We shall make available educational materials about marijuana products to consumers. We will have an adequate supply of current educational material available for distribution. Educational materials will be available in commonly spoken languages designated by the Commission, which will include, but not be limited to appropriate materials for the visually- and hearing-impaired. Such materials will be made available for inspection by the Commission upon request.

The educational material must include at least the following:

- A warning that marijuana has not been analyzed or approved by the FDA, that there is limited information on side effects, that there may be health risks associated with using marijuana, and that it should be kept away from children;

- A warning that when under the influence of marijuana, driving is prohibited by M.G.L. c. 90, § 24, and machinery should not be operated;

- Information to assist in the selection of marijuana, describing the potential differing effects of various strains of marijuana, as well as various forms and routes of administration;

- Materials offered to consumers to enable them to track the strains used and their associated effects;

## 253 Organic, LLC Management Operations and Policies

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Information describing proper dosage and titration for different routes of administration. Emphasis shall be on using the smallest amount possible to achieve the desired effect. The impact of potency must also be explained;

A discussion of tolerance, dependence, and withdrawal;

Facts regarding substance abuse signs and symptoms, as well as referral information for substance abuse treatment programs;

A statement that consumers may not sell marijuana to any other individual;

Information regarding penalties for possession or distribution of marijuana in violation

(j) Any other information required by the Commission.

### **P) Additional Product Manufacturing Procedure;**

Our Product Manufacturing site will satisfy minimum energy efficiency and equipment standards established by the Commission and meet all applicable environmental laws, regulations, permits and other applicable approvals, including those related to water quality and solid waste disposal, and to use additional best management practices as determined by the Commission in consultation with the working group established under St. 2017, c. 55, § 78(b) to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts. If minimum standards or best management practices are not established by the time of an application for initial licensure, We shall satisfy such standards or best management practices as a condition of license renewal, in addition to any the terms and conditions of any environmental permit regulating the licensed activity.

The extraction process is a closed loop CO2 system which is a non flammable process. This system has been approved in multiple states.

### **Q) Additional Information on Cultivation;**

253 Organics plans to cultivate the following genetics to be sold as flower, concentrates and edibles. Cookies and Cream, Purple Chem , Chem D, Kryptonite, Citradelic sunset, Kristna Kush, Hercules, Banana Pie, Green crack, Zweet Insanity. A combination of Hybrids, Sativa, Indica and CBD genetics. The plants will be grown in a coco medium using dry salts for nutrients under 630W ceramic metal halide bulbs. We will grow “mothers” and take clones from those mothers to propagate the grow cycle.

### **R) Banking/Cash**

253 Organics will use an approved licensed security company to transport cash from our location to our bank two times a week. All cash from daily sales will be audited against our POS/METRC systems daily and stored in the companies on site safe.



253 ORGANIC, LLC

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EMPLOYEE HANDBOOK

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June 1, 2019

The Wagner Law Group, P.C.  
99 Summer Street, 13<sup>th</sup> Floor  
Boston, MA 02110  
(617) 357-5200  
[www.wagnerlawgroup.com](http://www.wagnerlawgroup.com)

253 ORGANIC, LLC  
EMPLOYEE HANDBOOK

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## **WELCOME TO 253 ORGANIC, LLC**

253 Organic, LLC (the “Company”) is providing this handbook to give you an overview of the Company’s policies, benefits, and rules. This handbook contains important information about the Company and about your employment with the Company. Please understand that this handbook only provides general information about the policies, benefits, and regulations governing the employees of the Company and is not a legal document. It is also not intended to be an express or implied contract. The guidelines presented in this handbook are not intended to replace sound management, judgment, and discretion.

This handbook does not create an employment agreement and employees are regarded as employees-at-will (as described more fully herein).

It is impossible to anticipate every situation that may arise in the workplace or to provide information that answers every possible question. The Company, as a result, may be required to interpret portions of this handbook or deviate from its express provisions. In addition, circumstances will undoubtedly require that policies, practices, and benefits described in this handbook change from time to time. As a result, the Company reserves the right to modify, supplement, rescind, or revise any provision of this handbook from time to time as it deems necessary or appropriate in its sole discretion, with or without notice to you.

All of us must work together to make the Company a viable, healthy, and profitable organization. This is the only way we can provide a satisfactory working environment that promotes genuine concern and respect for others including all employees and our customers. If any statements in this handbook are not clear to you, please contact the Director of Operations.

### **COMPANY PHILOSOPHY**

#### **OPEN-DOOR POLICY**

Open communications and the flow of information are important to the Company. The Company communicates with its employees through notices and meetings. These communications are intended to keep you up-to-date and informed.

In keeping with the Company’s philosophy of open communication, all employees have the right and are encouraged to speak freely with management about their job-related concerns.

We urge you to go directly to management to discuss your job-related ideas, recommendations, concerns and other issues which are important to you. If, after talking

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with management, you feel the need for additional discussion, you are encouraged to speak with the Director of Operations. No retaliation or adverse action may be taken against an employee following this policy in good faith.

The most important relationship you will develop at the Company will be between you and your co-workers. However, should you need support from someone other than a co-worker, management is committed to resolving your individual concerns in a timely and appropriate manner.

### **EQUAL EMPLOYMENT OPPORTUNITY**

It is the Company's policy to provide equal employment opportunity to all employees and applicants for employment and not to discriminate on any basis prohibited by law, including race, color, gender, age, religion, national origin, ethnicity, disability, marital status, veteran status, transgender, sexual orientation, genetic information or any other basis prohibited by law. It is our intent and desire that equal employment opportunities will be provided in employment, recruitment, selection, compensation, benefits, promotion, demotion, layoff, termination and all other terms and conditions of employment. The Director of Operations and all managerial personnel are committed to this policy and its enforcement.

If you are disabled and need a reasonable accommodation in order to perform the essential functions of your job, you may request an accommodation. The Company will make every effort to provide a reasonable accommodation for your known disability (if you are a qualified individual) so that you can perform the essential functions of your job when you can do so without direct threat to yourself or others.

Employees are directed to bring any violation of this policy to the immediate attention of the Director of Operations. Any employee who violates this policy or knowingly retaliates against an employee reporting or complaining of a violation of this policy shall be subject to immediate disciplinary action, up to and including termination of employment. Complaints brought under this policy will be promptly investigated and handled with due regard for the privacy and respect of all involved.

### **HARASSMENT POLICY**

The Company will not tolerate harassment or intimidation of our employees on any basis prohibited by law, including race, color, gender or sexual orientation, age, ancestry, religion, national origin, ethnicity, handicap, disability, marital status, active military or veteran status, or genetic information. It is the Company's policy that any harassment, including acts creating a hostile work environment or any other discriminatory acts directed against our employees, will result in discipline, up to and including termination of employment. The Company also will not tolerate any such harassment of our employees by our customers, vendors or others whom our employees come into contact within our workplace.

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Employees must bring any violation of this policy to the immediate attention of the Director of Operations. The Company will thoroughly investigate all claims of harassment taking into consideration the privacy of the individuals involved. Any employee who knowingly retaliates against an employee who has reported workplace harassment or discrimination shall be subject to immediate disciplinary action, up to and including termination of employment.

## **SEXUAL HARASSMENT POLICY**

### *Introduction*

It is the Company's goal to promote a workplace free of sexual harassment. Sexual harassment of employees occurring in the workplace or in other settings in which employees may find themselves in connection with their employment is unlawful and will not be tolerated by the Company.

Employees are encouraged to bring concerns about sexual harassment to the attention of the Company. Any retaliation against an individual who has complained about sexual harassment or retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is also unlawful and will not be tolerated. To achieve our goal of providing a workplace free from sexual harassment, the conduct that is described in this policy will not be tolerated and we have created a procedure to handle concerns of inappropriate conduct.

Because the Company takes allegations of sexual harassment seriously, we will respond promptly to complaints of sexual harassment and where it is determined that such inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate.

Please note that while this policy sets forth our goals of promoting a workplace that is free of sexual harassment, the policy is not designed or intended to limit our authority to discipline or take remedial action for workplace conduct which we deem unacceptable, regardless of whether that conduct satisfies the definition of sexual harassment.

### *Definition of Sexual Harassment*

"Sexual harassment" means sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature when:

- i. Submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly as a term or condition of employment or as a basis for employment decisions; or,

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- ii. Such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual's work performance by creating an intimidating, hostile, humiliating or sexually offensive work environment.

Under these definitions, direct or implied requests by a co-worker for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment constitutes sexual harassment.

The legal definition of sexual harassment is broad and in addition to the above examples, other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a workplace environment that is hostile, offensive, intimidating, or humiliating to male or female workers may also constitute sexual harassment.

While it is not possible to list all those additional circumstances that may constitute sexual harassment, the following are some examples of conduct which if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances including the severity of the conduct and its pervasiveness:

- i. Unwelcome sexual advances – whether they involve physical touching or not;
- ii. Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life; comment on an individual's body, comment about an individual's sexual activity, deficiencies, or prowess;
- iii. Display of sexually suggestive objects, pictures, screensavers, cartoons, or videos;
- iv. Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments;
- v. Inquiries into one's sexual experiences;
- vi. Discussion of one's sexual activities;
- vii. Sending sexually oriented or sex-based emails or text messages;
- viii. The use of the computer to disseminate sexually oriented or sex-based communications; and
- ix. Access of sexually explicit internet websites.

All employees should take special note that, as stated above, retaliation against an individual who has complained about sexual harassment, and retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is unlawful and will not be tolerated by this Company.

### *Complaints of Sexual Harassment*

If any of our employees believes that he or she has been subjected to sexual harassment, the employee has the right to file a complaint with the Director of Operations. This may be done in writing or orally.

If you would like to file a complaint you may do so by contacting either of the following individuals:

John Snyder  
Director of Operations  
253 Millers Falls Road  
Turners Falls, MA 01376  
Tel.

Bambi Rawlings-Chamberlin  
Human Resources Manager  
253 Millers Falls Road  
Turners Falls, MA 01376  
Tel.

They are also available to discuss any concerns you may have and to provide information to you about our policy on sexual harassment and our complaint process.

### *Sexual Harassment Investigation*

We will promptly investigate the allegation in a fair and expeditious manner. Furthermore, we will make every effort to maintain confidentiality under the circumstances. Our investigation will include a private interview with the person filing the complaint and with witnesses. We will also interview the person alleged to have committed sexual harassment. When we have completed our investigation, we will, to the extent appropriate inform the person filing the complaint and the person alleged to have committed the conduct of the results of that investigation.

If it is determined that inappropriate conduct has occurred, we will act promptly to eliminate the offending conduct, and where it is appropriate we will also impose disciplinary action.

### *Disciplinary Action*

If it is determined that inappropriate conduct has been committed by one of our employees, we will take such action as is appropriate under the circumstances. Such action may range from counseling to termination from employment, and may include such other forms of disciplinary action as we deem appropriate under the circumstances.

### *State and Federal Remedies*

In addition to the above, if you believe you have been subjected to sexual harassment or any other form of discrimination, you may file a formal complaint with either or both the federal or applicable state agencies set forth below. Using our {99913/A0320671.2}

complaint process does not prohibit you from filing a complaint with these agencies. Each of the agencies listed below has a short time period for filing a claim with the agency (EEOC - 300 days; MCAD - 300 days;). There may be other time periods for filing claims in court.

- i. The U.S. Equal Employment Opportunity Commission (“EEOC”)  
1 Congress Street, 10<sup>th</sup> Floor  
Boston, MA 02114  
617-565-3200  
<http://www.eeoc.gov/boston/index.html>
- ii. Massachusetts Commission Against Discrimination (“MCAD”)  
One Ashburton Place  
Boston, MA 02108  
617-727-3990  
<http://www.mass.gov/mcad/>

## **WORKING AND COMPENSATION**

### **EMPLOYMENT ON AN AT-WILL BASIS**

All employees of the Company, regardless of their classification or position, are employed on an at-will basis. This means that each employee’s employment can be terminated at the will of the employee or the Company at any time, with or without cause and with or without notice. Any officer, agent, representative, or employee of the Company, except in writing and signed by the Director of Operations, does not have the authority to enter into any agreement with any employee or applicant for employment on other than on an at-will basis. Furthermore, nothing contained in the policies, procedures, handbooks, manuals, job descriptions, applications for employment, or any other document of the Company shall in any way create an express or implied contract of employment or an employment relationship on other than an at-will basis.

### **ATTENDANCE AND REPORTING TO WORK**

Each employee is important to the overall success of our operation. When you are not here, someone else must do your job. Consequently, you are expected to report to work on time at the start of your scheduled shift. Reporting to work on time means that you are ready to start work, not just arriving at work, at your scheduled starting time.

The Company depends on its employees to be at work at the times and locations scheduled. Excessive absenteeism and/or tardiness will lead to disciplinary action, up to and including termination of employment. The determination of excessive absenteeism will be made at the discretion of the Company. Absence from work for three consecutive days without properly notifying your Direct Supervisor will be considered a voluntary

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resignation. After two days' absence, you may be required to provide documentation from your doctor or clinic to support an injury- or illness-related absence, and to ensure that you may safely return to work.

If you expect to be absent from the job for an approved reason (*e.g.*, paid time off or a leave of absence), you should notify your Direct Supervisor of your upcoming absence as far in advance as possible. If you unexpectedly need to be absent from or late to work, you must notify your Direct Supervisor at least 30 minutes prior to the start of your scheduled shift/workday that you will be late or absent and provide the reason for that absence or lateness. If your Direct Supervisor is not available, you should contact the Human Resources Manager or leave a voice message for your Direct Supervisor prior to the start of your scheduled shift/workday. Be sure to leave your telephone number so your Direct Supervisor can return your call. Failure to properly contact the Company will result in an unexcused absence for disciplinary purposes. Your attendance record is a part of your overall performance rating. Your attendance may be included during your review and may be considered for other disciplinary action up to and including termination of employment.

Whenever possible, medical and dental appointments should be scheduled around your assigned work hours; otherwise, they may be considered absences without pay. If you are unable to schedule an appointment before or after your regularly scheduled workday, you are required to talk to your Direct Supervisor to make special arrangements.

Furthermore, if you leave work early or for a period of time during the day, you must notify your Direct Supervisor when you leave and when you expect to return. For example, you should notify your Direct Supervisor if you need to leave during your lunch break to run an errand.

### **WORKDAY HOURS AND SCHEDULING**

The regularly scheduled workday is established by the Director of Operations when you are hired. Your schedule is subject to change based on business needs. Whenever possible, the Company will try to give you one week advance notice of a change in your schedule, but based on business needs, the Company may not be able to give advance notice.

In case of unplanned conditions, such as bad weather, that may force a schedule change at the last minute, you should contact the Director of Operations.

The Company generally schedules meal periods and rest periods during the workday. Rest periods are 15-minute paid breaks. For meals, our policy is:

- i. Meal periods will be no less than a 1/2 hour.
- ii. The meal period is unpaid.

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- iii. All employees are required to take a lunch break and no employee is authorized, without prior approval, to perform work during the lunch period.
- iv. The employee must spend the meal period away from his/her work station.
- v. An employee may spend the meal period at his/her assigned work station only if he/she is working during the meal period and overtime hours have been approved.

### **RECORDING HOURS WORKED**

All employees are required to record their time. The Company will provide you with a time card for reporting your hours. Only you are authorized to record your own time.

Unless specifically authorized by the Company and only if work must be performed, employees may not start recording time before their regularly scheduled starting time or after their regularly scheduled quitting time.

Any time missed, not to exceed 40 hours, during the week may be made up during the same workweek with the supervisor's approval.

Employees must correctly record their hours for each working day. Completed time cards must be given to the Human Resources Manager no later than 10:00 a.m. every Monday after the end of a pay period. If the last day of the pay period is a holiday, time cards are due on the Tuesday after the end of the pay period. Supervisors are responsible to ensure that the time reported by employees is accurate.

Failure to turn in time cards by the applicable deadline may delay your paycheck.

Falsification of time reporting or actual time worked may result in disciplinary action, up to and including termination of employment.

### **PAY PERIOD AND PAYDAY**

The Company issues paychecks every other Friday. Pay periods start on Monday morning and end two weeks later on Sunday evening. On the Friday after the last day of each pay period, you will receive a paycheck for all hours worked during that pay period. If you use direct deposit, your pay will generally be available for withdrawal from your bank account on the pay date.

### **HOLIDAYS**

The Company observes the following holidays:

- i. New Year's Day

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- ii. Memorial Day
- iii. Fourth of July
- iv. Labor Day
- v. Thanksgiving
- vi. Christmas

Full-time employees, including those in their 90-day probationary period, will be paid for these holidays as long as they are present for work on the workdays immediately before and after that holiday, or have an acceptable reason for being absent on any such days. If a paid holiday falls within an employee's vacation period, the holiday will not be counted as a vacation day.

Part-time, temporary and seasonal employees are not eligible for holiday pay.

### **EMPLOYMENT CLASSIFICATIONS**

Upon being hired by the Company, all new employees must serve a ninety (90) calendar day introductory period. It is especially important that you make the Human Resources Manager aware of any questions or problems you may encounter during this period. Your performance will be carefully monitored during this period. Satisfactory completion of the introductory period does not entitle you to employment for any specific term.

For the sole purpose of determining the allowance of certain employee benefits, employees are classified as:

- i. Regular Full-Time Employees - An employee who is scheduled to work an average of forty (40) hours per week on a regular and continuous basis.
- ii. Regular Part-Time Employees - An employee who is usually scheduled to work less than an average of forty (40) hours per week on a regular and continuous basis. Regular part-time employees are not eligible for participation in those employee benefits programs made available for regular full-time employees.
- iii. Temporary or Seasonal Employees - An employee whose services are anticipated to be of limited duration falls into this classification. Temporary and seasonal employees are not eligible for participation in those employee benefits programs made available for regular full-time employees.

For payroll purposes, employees will be classified as one of the following:

- i. Exempt Employees - Certain employees such as executive and professional employees are paid on a salary basis for all hours worked each week. These employees are expected to work whatever hours are required to accomplish their duties, even if it exceeds their normal

workweek. No overtime premium pay will be paid to exempt employees in most circumstances.

- ii. Non-Exempt Employees - All employees who are not identified as exempt employees are considered non-exempt employees. Non-exempt employees are eligible for payment of overtime premium pay.

## **OVERTIME**

Occasionally it may be necessary for an hourly employee to work beyond his or her normal workday hours. Overtime pay is paid only when work is scheduled, approved, and made known to the hourly employee in advance by a supervisor. The supervisor must obtain approval from the Director of Operations before requesting an hourly employee to work overtime. Under no circumstances may hourly employees work overtime without such prior approval.

Hourly employees will receive overtime pay at a rate of one-and-one-half times their regular hourly rate for all hours worked in excess of 40 in a workweek. Hours cannot be accrued, banked, or averaged from one week to another. Also, in no case, may hourly employees take compensatory time off in a following week in lieu of overtime pay.

To the extent possible, overtime will be distributed equally among all hourly employees in the same classification and position, provided that the hourly employees concerned are equally capable of performing the available work. Decisions regarding overtime work will be made by the appropriate supervisor.

Supervisors must provide an hourly employee with as much advance notice as possible when overtime is required so that the hourly employee can rearrange his/her schedule to work the requested time. Less than two hours is generally not considered adequate advance notice.

If overtime has not been authorized by the Director of Operations, supervisors may not ask hourly employees to work beyond their regularly scheduled hours or cut their meal period short. Demands on hourly employees to work when overtime has not been authorized violates the Fair Labor Standards Act.

## **MAINTAINING YOUR PERSONNEL RECORDS**

It is your responsibility to provide current information regarding your address, telephone number, emergency contact information, insurance beneficiaries, change in dependents, marital status, etc. Please notify the Human Resources Manager of any changes in your address, phone number, emergency contact information, marital status, number of dependents, etc. Changes in exemptions for tax purposes will only be made upon the receipt of a completed W-4 form.

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## **PERSONNEL FILES**

Your personnel file is the property of the Company, and does not belong to you. However, upon request, you may review your personnel file in the presence of Human Resources provided you give the Company reasonable advance notice. You may also request a copy of any item(s) in your personnel file, and if you disagree with an item in your file, you may respond to that item in writing. A reasonable fee may be charged for copies. You may not remove anything from your personnel file.

## **JOB DESCRIPTIONS**

The Company makes every effort to create and maintain accurate job descriptions for all positions within the organization. Each description includes a job information section, a job summary section (giving a general overview of the job's purpose), an essential duties and responsibilities section, a supervisory responsibilities section, a qualifications section (including education and/or experience, language skills, mathematical skills, reasoning ability, and any certification required), a physical demands section, and a work environment section.

The Company maintains job descriptions to aid in orienting new employees to their jobs, identifying the requirements of each position, establishing hiring criteria, setting standards for employee performance evaluations, and establishing a basis for making reasonable accommodations for individuals with disabilities.

The Company will prepare job descriptions when new positions are created. Existing job descriptions are also reviewed and revised in order to ensure that they are up to date. Job descriptions may also be rewritten periodically to reflect any changes in the position's duties and responsibilities. All employees will be expected to help ensure that their job descriptions are accurate and current, reflecting the work being done.

Employees should remember that job descriptions do not necessarily cover every task or duty that might be assigned, and that additional responsibilities may be assigned as necessary. Contact the Director of Operations if you have any questions or concerns about your job description.

## **PERFORMANCE EVALUATIONS**

Employees may have their job performance reviewed after the first 90 days of employment and on an annual basis by the Company. The Company may conduct evaluations more frequently as deemed necessary and appropriate by management.

## **TERMINATION OF EMPLOYMENT**

Employees are responsible for all Company property, materials or written information issued to them or in their possession or control. Employees must return all such information immediately upon termination of employment.

## **REFERENCES/EMPLOYMENT VERIFICATION**

Any requests for personnel information or references should be directed to the Human Resources Manager. Unless the Company receives a written request from an employee authorizing the Company to provide a reference, it is the Company's policy to confirm only dates of employment and position held in response to a request for a reference on a present or former Company employee. Exceptions to this policy only may be made by the Director of Operations.

The Company strongly discourages you from providing a "personal reference" on behalf of any employee, former employee or non-Company employee. Personal references may not be written on Company letterhead. Any personal references that you provide must include a statement that you are acting in an individual capacity, and not on behalf of the Company.

## **EMPLOYEE ELIGIBILITY VERIFICATION (I-9)**

All employers are required by the Immigration and Reform Control Act of 1986 to verify that all employees hired after November 1986 are authorized to work in the United States. This means that new employees must present documentation that establishes their United States citizenship, permanent resident status, or work authorization for non-immigrant aliens.

After an offer of employment is made and prior to beginning work, employees must complete an Employee Eligibility Verification, Form I-9, and present appropriate verification documentation. All offers of employment, and continued employment of persons whose employment authorization is of limited duration, are conditioned upon such employee's establishing his/her work authorization.

## **REGISTERED AGENT IDENTIFICATION CARD**

An application for a registered agent identification card will be filed with the Commonwealth for each candidate offered a position of employment with the Company. The application will, as required, provide the following information:

- i. Candidate's full name, address, date of birth;
- ii. All aliases used previously or currently including maiden names;
- iii. A copy of the candidate's driver's license or other government-issued ID;

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- iv. Attestation that the individual will not engage in the diversion of marijuana products;
- v. Written acknowledgement by the candidate of any limitations on his/her authorization to cultivate, harvest, prepare, package, possess, transport and dispense marijuana in the Commonwealth;
- vi. Background information including the following:
  - a. Description and dates of any criminal action that occurred in any jurisdiction which resulted in a conviction, guilty plea, plea of nolo contendere, or admission of sufficient facts;
  - b. Description and dates of any civil or administrative action that occurred in any jurisdiction relating to any professional, occupational or fraudulent practices;
  - c. Description and dates of any past or pending action on a license that occurred or is occurring in any jurisdiction; and
  - d. Description and dates of any past or pending disciplinary action or unresolved complaint that occurred or is occurring in any jurisdiction.

#### **CRIMINAL OFFENDER RECORD INFORMATION (CORI) REPORT**

The Company is required to obtain a Criminal Offender Record Information (“CORI”) report for each employee within 30 days prior to the submission of his/her application for a registered agent identification card.

This information will be used to fill out the background check information for criminal actions for each application for a registered agent identification card.

CORI reports will be stored securely and kept confidential. They will, however, be subject to review by the Commission investigators on request.

CORI reports are only valid for one year from the date they are generated. New CORI reports must be obtained, for all employees prior to the one-year anniversary of the last report that was generated.

#### **BACKGROUND CHECKS**

In order to obtain a required registered agent identification card, the Company will conduct background checks on all candidates offered positions of employment. The Company may also conduct a background check on any current employee if the Company has cause to believe that a background check is warranted.

Background checks will be conducted in compliance with federal and state law by a reputable third party consumer reporting agency. Information obtained through a background check will be kept separate from the employee’s regular personnel file and will be maintained in strict confidence.

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The background check generally will include a review of information from an individual's previous employer(s), educational institutions, law enforcement agencies at the federal, state and county levels; and in some cases credit reporting agencies. Background checks may include but are not limited to the following:

- i. Review of criminal records,
- ii. Verification of social security number,
- iii. Verification of educational records,
- iv. Verification of employment records, and
- v. Sexual offender registry search.

For new hires, background checks ordinarily will be processed at the time a conditional offer of employment is made.

In each case in which a background check will be performed, the individual will be asked to complete and sign a release authorizing the third-party vendor to conduct the background check. If the individual fails to sign the release, any offer for employment will be rescinded, and any current employment with the Company may be terminated.

Background check reports will be obtained and reviewed by Human Resources, who may review the information with the appropriate member of senior staff, the Company's legal counsel, or others with a need to know.

If an individual is denied employment due, wholly or in part, to information obtained in a background check, he/she will be so informed in advance of any adverse action. In addition, where required by law and to the extent applicable, the individual will be given (a) a copy of the relevant background check report, (b) a summary of the individual's legal rights concerning the background check report, and (c) the name, address and phone number of the third-party vendor if the individual has questions about the results of the report or wants to dispute the accuracy of the report. It is important to note, however, that the vendor does not make employment decisions and will be unable to provide any individual with specific reasons as to why the adverse action was taken.

## **STANDARDS AND EXPECTATIONS FOR THE WORKPLACE**

### **SAFETY**

The Company believes in maintaining safe and healthy working conditions for our employees. However, to achieve our goal of providing a safe workplace, each employee must be safety conscious. We have established the following policies and procedures that allow us to provide safe and healthy working conditions. We expect each employee to follow these policies and procedures, to act safely, and to report unsafe conditions to the Director of Operations in a timely manner.

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The Company provides information to employees about workplace safety and health issues through regular internal communication channels such as supervisor-employee meetings, bulletin board postings, memos, or other written communications. The Safety Committee, which is composed of representatives from throughout the organization, has been established to help monitor the Company's safety program and to facilitate effective communication between employees and management about workplace safety and health issues. The Safety Committee has responsibility for implementing, administering, monitoring, and evaluating the safety program. Its success depends on the alertness and personal commitment of all.

Employees and supervisors receive periodic workplace safety training. The training covers potential safety and health hazards and safe work practices and procedures to eliminate or minimize hazards.

Some of the best safety improvement ideas come from employees. Those with ideas, concerns, or suggestions for improved safety in the workplace are encouraged to raise them with their supervisor, or with another supervisor or manager, or bring them to the attention of a member of the labor-management safety committee. Reports and concerns about workplace safety issues may be made anonymously if the employee wishes. All reports can be made without fear of reprisal.

#### *Reporting Unsafe Conditions or Practices*

Employees are expected to be on the lookout for unsafe working conditions or practices, regardless of how insignificant the injury may appear. If you observe an unsafe working condition, you should warn others, if possible, and report that unsafe working condition to the Director of Operations immediately. If you have a question regarding the safety of your workplace and practices, ask the Director of Operations for additional information.

If you observe a co-worker using an unsafe practice, you are expected to mention this to the co-worker and to the Director of Operations. Likewise, if a co-worker brings to your attention an unsafe practice you may be using, please thank the co-worker and make any necessary adjustments to what you are doing. Safety at work is a team effort.

The Company will not retaliate against an employee who reports an unsafe working condition. This is important because one goal of the Company is to provide a safe and appropriate workplace.

#### **VISITORS IN THE WORKPLACE**

To provide for the safety and security of employees and the facilities at the Company, only authorized visitors are allowed in the workplace. Restricting unauthorized visitors helps maintain safety standards, protects against theft, ensures security of

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equipment, protects confidential information, safeguards employee welfare, and avoids potential distractions and disturbances.

Because of safety and security reasons, family and friends of employees are discouraged from visiting. In cases of emergency, employees will be called to meet any visitor outside their work area.

If an unauthorized individual is observed on the Company's premises, employees should immediately notify their supervisor or, if necessary, direct the individual to the office.

### **MAINTAINING A SAFE WORKSITE**

We expect employees to establish and maintain a safe worksite. This includes but is not limited to the following:

- i. Wear appropriate safety gear at all times.
- ii. Wear appropriate clothing around or while operating machinery.
- iii. Handle tools and machinery with care and respect.
- iv. Refrain from using cell phones, MP3 players or other electronic devices while handling Company machinery or vehicles or working in the factory.
- v. Refrain from horseplay and practical jokes in the workplace.
- vi. Never operate Company machinery or vehicles while intoxicated or taking medications that impair your judgment.
- vii. Never tamper with or use equipment in an unauthorized manner.
- viii. Employees may not chew gum or eat candy or food while working in production.
- ix. Employees working in production must wear a hairnet, gloves, proper boots, a clean apron, and any other clothing that the Company deems to be appropriate at all times.

Employees can prevent accidents and contribute to a safe work environment by carefully examining their equipment to see if it is in good working order on a routine basis, and report any needed repairs.

### **REPORTING AN INJURY**

Employees are required to report any injury, accident, or safety hazard immediately to the Director of Operations. Minor cuts or abrasions must be treated on the spot. More serious injuries or accidents will be treated accordingly. Serious injuries must be reported on the injury or accident report form available in the main office.

### **FIRST AID**

Only those employees certified to provide first aid may provide first aid.

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## **CARE OF EQUIPMENT AND SUPPLIES**

All employees are expected to take care of all equipment (*e.g.*, tools, computers, cell phones, etc.) and supplies provided to them. You are responsible for maintaining any equipment provided to you in proper working condition and for promptly reporting any problems with the equipment to the Director of Operations.

If employees find that equipment is not working properly or in any way appears unsafe, they must notify their supervisor immediately so that repairs or adjustments may be made. Under no circumstances should employees start or operate equipment that they deem unsafe, nor should they adjust or modify the safeguards provided.

Delivery drivers are expected to make a daily visual inspection of the vehicles and to promptly report any damage to the vehicle. The drivers must also maintain the cleanliness of the inside and outside of the vehicle. The drivers must report any accident or incident immediately.

Neglect, theft, and/or destruction of the Company's equipment are grounds for disciplinary action, up to and including termination of employment.

## **SMOKING AT THE WORKPLACE**

The Company's policy is to provide smoke-free environments for our employees, customers and visitors. Smoking of any kind is prohibited inside our buildings. Employees may smoke on scheduled breaks or during meal times, as long as they do so in designated areas. Smoking breaks must be limited to 3 times daily. Employees who take excessive smoke breaks may be required to work longer hours to make up for time lost smoking.

## **VIOLENCE AND WEAPONS**

The Company believes in maintaining a safe and healthy workplace, in part by promoting open, friendly, and supportive working relationships among all employees. Violence or threats of violence have no place in our business. Violence is not an effective solution to any problem. Employees are strictly prohibited from bringing any weapons, including knives, pistols, rifles, stun guns, Mace, etc., to work. Conduct that threatens, intimidates or coerces another employee, a customer or a member of the public at any time, including off-duty periods, will also not be tolerated. Furthermore, if you have a problem that is creating stress or otherwise making you agitated, you are encouraged to discuss it with the Director of Operations or the Human Resources Manager.

You are expected to immediately report to the Director of Operations any violation of this policy. Any employee found threatening another employee (directly or

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indirectly), fighting, and/or carrying weapons to work will be subject to disciplinary action, up to and including termination of employment.

### **DRUG-FREE WORKPLACE**

The Company does not tolerate the presence of illegal drugs or the illegal use of legal drugs in our workplace. The use, possession, distribution, or sale of controlled substances such as drugs or alcohol, or being under the influence of such controlled substances is strictly prohibited while on the Company's premises or while visiting customers. The use of illegal drugs as well as the illegal use of legal drugs is a threat to everyone because it can cause problems with safety, customer service, productivity, and our ability to survive and prosper as a business. If you need to take a prescription drug that affects your ability to perform your job duties, you are required to discuss possible accommodations with the Director of Operations. Violation of this policy will result in disciplinary action, up to and including termination of employment.

To help ensure a safe and healthful working environment, job applicants and employees may be asked to provide body substance samples (such as urine and/or blood) to determine the illicit or illegal use of drugs and alcohol. Refusal to submit to drug testing may result in disciplinary action, up to and including termination of employment. Questions concerning this policy or its administration should be directed to the Director of Operations. Nothing in this section shall be read to override any protections provided to employees by The Regulation and Taxation of Marijuana Act, as amended by St. 2017,c.55, An Act To Ensure Safe Access To Marijuana, with which the Company will comply fully and recognize all associated employee rights.

Any employee who is convicted of violating criminal drug statutes must notify the Director of Operations of that conviction within five days of the conviction. Failure to do so may lead to disciplinary action.

**Your receipt of this policy statement and signature on the handbook acknowledgment form signify your agreement to comply with this policy.**

### **RESPONDING TO CUSTOMER INQUIRIES AND PROBLEMS**

At the Company, customer satisfaction is the measure of our success. It is the responsibility of each employee who interacts with customers to respond to customer's inquiries and problems in a professional and courteous manner.

### **APPEARANCE AND DRESS**

In order to maintain a clean and safe working environment, all employees are required to wear appropriate clothing on the job.

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Employees should always be neatly groomed and clothes should be clean and in good repair.

Your supervisor or department head is responsible for establishing a reasonable dress code appropriate to the job you perform. If your supervisor feels your personal appearance is inappropriate, you may be asked to leave the workplace until you are properly dressed or groomed. Under such circumstance, you will not be compensated for the time away from work. Consult your supervisor if you have questions as to what constitutes appropriate appearance. Where necessary, reasonable accommodation may be made to a person with a disability.

Without unduly restricting individual tastes, the following personal appearance guidelines should be followed:

- i. Shoes must provide safe, secure footing, and offer protection against hazards.
- ii. Tank tops, tube or halter tops, may not be worn under any circumstances.
- iii. Hairstyles are expected to be clean and in good taste.
- iv. No facial piercings such as nose rings, eyebrow piercings, lip rings, etc. are allowed.
- v. No jewelry or nail polish while working in production.

### **CONFLICTS OF INTEREST**

You should avoid external business, financial, or employment interests that conflict with the Company's business interests or with your ability to perform your job duties. This applies to your possible relationships with any other employer, customer, or business associate.

This policy establishes only the framework within which the Company wishes the business to operate. The purpose of these guidelines is to provide general direction so that employees can seek further clarification on issues related to the subject of acceptable standards of operation. Contact the Human Resources Department for more information or questions about conflicts of interest.

An actual or potential conflict of interest occurs both when an employee's responsibility of loyalty to the Company is compromised by the employee's outside interests and when an employee's influence over a decision may result in a personal gain for that employee or for a relative, friend, or other person with whom the employee has a personal relationship as a result of the Company's business dealings. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

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Transactions with outside firms must be conducted within a framework established and controlled by the executive level of the Company. Business dealings with outside firms should not result in unusual gains for those firms. Unusual gain refers to bribes, product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit either the employer, the employee, or both.

Personal gain may result not only in cases where an employee or relative has a significant ownership in a firm with which the Company does business, but also when an employee or relative receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving the Company.

No “presumption of guilt” is created by the mere existence of a relationship with outside firms. However, if employees have any influence on transactions involving purchases, contracts, or leases, it is imperative that they disclose to an officer of the Company as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.

Violations of this rule may lead to disciplinary action, up to and including termination of employment.

### **CODE OF ETHICAL CONDUCT**

To ensure the successful business operation of the Company, we expect that all of our employees will conduct themselves fairly and ethically. The Company’s reputation for integrity and excellence requires that our employees carefully observe the spirit and letter of all applicable laws and regulations and at all times exhibit a scrupulous regard for the highest standards of conduct and personal integrity.

The Company’s success is dependent upon its outstanding reputation which we are dedicated to preserving. Employees owe a duty to the Company and its principals to act in a way that will merit the excellent reputation enjoyed by the Company.

The Company will comply with all applicable laws and regulations and expects its directors, officers, and employees to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest or unethical conduct, conflicts of interest, as discussed below are strictly prohibited.

In order to avoid any appearance of a conflict of interest, employees are expected to abide by the following code of ethical conduct. Please consult the Director of Operations if you have any questions.

Employees of the Company should not solicit anything of value from any person or organization who has (or may have) a business relationship with the Company.

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Employees of the Company should not accept any item of value from any person or organization in exchange for or in connection with a business transaction between the Company and that other person or organization.

Employees may accept items of incidental value (generally, no more than \$25) from customers, suppliers, or others as long as the gift is not given in response to solicitation on your part and as long as it implies no exchange for business purposes. Items may include gifts, gratuities, food, drink and entertainment.

If you are faced with and are unsure how to handle a situation that you believe has the potential to violate this code of ethical conduct, notify the Director of Operations.

Violations of this code may lead to disciplinary action, up to and including termination of employment.

### **SOLICITATION AND DISTRIBUTION**

For the safety, convenience, and protection of all employees, the Company prohibits solicitation and distribution of non-company materials on Company property at all times.

### **PERSONAL CALLS, VISITS, AND BUSINESS**

The Company expects the full attention of its employees while they are working. Although employees may occasionally have to take care of personal matters during the workday, employees should try to conduct such personal business either before or after their scheduled work shift or during breaks or meal periods. Regardless of when any personal call is made, it should be kept short.

Employees should also limit incoming personal calls, visits, or personal transactions. A pattern of excessive personal phone calls, personal visits, and/or private business dealings during work hours is not acceptable and may lead to disciplinary action.

### **BUSINESS EXPENSES**

Employees may occasionally incur expenses on behalf of the Company. Employees must receive prior written approval from the Director of Operations or the Human Resources Manager. The Company will reimburse employees for typical business expenses, such as mileage (*e.g.*, travel to visit a customer during the workday) and certain job-related supplies or materials. The Company will pay mileage reimbursements at the end of each month, upon receipt of the employee's mileage record. In order to be reimbursed for job-related supplies or materials, you must deliver a receipt for the supplies or materials to the Human Resources Manager within 7 days of the purchase.

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## **PERSONAL PROPERTY**

Personal items should not be stored or kept in Company desks, lockers or files. The Company will not be responsible for the loss or theft of personal items at its facilities, and employees should have no expectation that documents, photographs, or other items left on Company property will remain private.

## **INSPECTION OF PERSONAL AND COMPANY PROPERTY**

The Company's employees use the property and equipment the Company owns and provides, and may also use the Company's materials, information, and other supplies. You must remember that property supplied by the Company remains the property of the Company. The Company reserves the right to search any Company property (*e.g.*, cell phones, desks, or other storage areas) at any time. The Company also reserves the right to inspect personal property (*e.g.*, purses and knapsacks) during the workday or as employees leave the office. Refusal to allow inspection may lead to disciplinary action, up to and including termination of employment.

## **SECURITY POLICY**

The Security Policy protects Protected Personal Information as defined in the Massachusetts Data Security Law. Protected Personal Information is an individual's first name and last name or first initial and last name in combination with any one or more of the following data elements that relate to such individual:

- i. Social security number,
- ii. Driver's license number or state-issued identification card number, or
- iii. Financial account number, or credit card or debit card number, with or without any required security code, access code, personal identification number or password that would permit access to such individual's financial account (*e.g.*, checking account numbers, savings account numbers, etc.).

Protected Personal Information does not include information that is lawfully obtained from publically available information, or from federal, state or local government records lawfully made available to the general public.

### *Security Officer*

The Company has named Seth Rutherford as the Security Officer with the overall responsibility for the development, implementation, maintenance and supervision of security policies that conform to the Massachusetts Data Security Law. The Security Officer must ensure the confidentiality, integrity and availability of all electronic Protected Personal Information that the Company creates, receives, maintains or

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transmits; protect against any reasonably anticipated threats or hazards to the security or integrity of electronic Protected Personal Information; protect against any reasonably anticipated uses or disclosures of electronic Protected Personal Information that are not permitted or required; ensure compliance with the Massachusetts Data Security Law.

The Security Officer is responsible for ensuring that the Company:

- i. Complies with Massachusetts Data Security Law,
- ii. Develops and implements security policies and procedures that comply with federal and state law,
- iii. Maintains the confidentiality of Protected Personal Information created or received by the Company from the date such information is created or received until it is destroyed,
- iv. Tests security safeguards on a routine basis,
- v. Reviews the scope of the security measures at least annually, or whenever there is a material change in the Company's business practices that may implicate the security or integrity of records containing Protected Personal Information, and
- vi. Provides the appropriate level of training for all employees, as required.

#### *Internal Security*

To combat internal risks to security, confidentiality and/or integrity of any electronic, paper or other records containing Protected Personal Information, and evaluating and improving, where necessary, the effectiveness of the current safeguards for limiting such risks, the following measures are mandatory and effective immediately.

- i. A copy of this Security Policy must be distributed to all employees, who, upon receipt, must acknowledge in writing that he/she has received a copy.
- ii. Employment contracts and/or confidentiality agreements must contain provisions requiring employees to comply with this Security Policy and to prohibit any nonconforming use of Protected Personal Information during or after employment; with mandatory disciplinary action to be taken for any violation of this Security Policy. Violations may result in disciplinary action, up to and including termination of employment, assignment, or association with the Company. Such disciplinary action shall take into account the severity of the violation and the number of violations.
- iii. The amount of Protected Personal Information must be limited to the minimum amount needed for legitimate business purposes, or to comply with the Company's privacy policies and procedures, and federal and state regulations.
- iv. Access to records containing Protected Personal Information must be limited to those persons who need to have access to such information for

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legitimate business purposes or to comply with the Company's privacy policies and procedures, and federal and state regulations.

- v. Electronic access to user identification after multiple unsuccessful attempts to gain access must be blocked.
- vi. All security measures must be reviewed annually, or whenever there is a material change in the Company's business practices that may reasonably implicate the security or integrity of records containing Protected Personal Information. The Security Officer is responsible for this review and any recommendation for improved security arising out of that review.
- vii. Terminated employees must return all records containing Protected Personal Information, in any form, that may at the time of such termination be in the former employee's possession (including all such information stored on laptops or other portable devices or media, and in files, records, work papers, etc.).
- viii. A terminated employee's physical and electronic access to Protected Personal Information must be blocked immediately. Such terminated employee shall be required to surrender all keys, IDs, access cards or badges, business cards, etc., that permit access to the Company's premises or information. Moreover, such terminated employee's remote electronic access, e-mail access, internet access, and passwords must be invalidated. The Security Officer shall maintain a highly secured master list of all lock combinations, passwords and keys.
- ix. Current employees' IDs and passwords must be changed periodically. Passwords must contain at least one alpha character, one numeric character and one symbol.
- x. Access to Protected Personal Information shall be restricted to active uses and active user accounts only.
- xi. Employees must immediately report any suspicious or unauthorized use of Protected Personal Information to the Security Officer.
- xii. Whenever there is a Security Breach requiring notification in accordance with the Massachusetts Data Security Law, there shall be an immediate mandatory post-incident review of events and actions taken, if any, with a view to determining whether any changes in the Company's security practices is required to improve the security of Protected Personal Information.
- xiii. Employees may not keep open files containing Protected Personal Information on their desks when they are not at their desks. Employees may not store Company files on personal computers or keep client files offsite.
- xiv. At the end of each work day, all files and other records containing Protected Personal Information must be secured in a manner that is consistent with the Company's privacy policies and procedures, and federal and state law. For example, materials should not be left in open spaces such as administrative assistants' desks. Also, employees must log off computers at the end of each working day.

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- xv. The Company shall develop rules (bearing in mind its business needs) that ensure that reasonable restrictions upon physical access to records containing Protected Personal Information are in place, including a written procedure that sets forth the manner in which physical access to such records is restricted; and the Company must store such records and data in locked facilities; secure storage areas or locked containers.
- xvi. Access to electronically stored Protected Personal Information shall be electronically limited to those employees having a unique log-in ID; and re-log-in shall be required when a computer has been inactive for more than a few minutes.
- xvii. Visitors' access to the Company's offices must be restricted. Visitors may not be allowed to wander freely through the Company's offices. Whenever possible, employees should meet with visitors in a secure confidential space when conversations may involve Protected Personal Information. From time to time vendors are allowed free access to the Company's office. Employees should not conduct conversation regarding business matters when such visitors are present unless necessary.
- xviii. Paper or electronic records (including records stored on hard drives or other electronic media) containing Protected Personal Information shall be disposed of only in a manner that complies with M.G.L.c. 93I (*e.g.*, paper documents should be shredded prior to disposal).
- xix. Paper or electronic records (including records stored on hard drives or other electronic media) containing and/or Protected Personal Information shall be retained in a manner that complies with business practices, Federal and State laws.
- xx. To ensure system compatibility and the security of electronic information, employees may not install or modify software on any computer provided or owned by the Company unless express prior approval is provided by the Company. This approval must be obtained for each installation or service.
- xxi. To ensure that services provide appropriate security measures and that affected equipment can be safeguarded to avoid the downloading of computer viruses, express prior permission must be obtained from the Company before subscribing to, or using, any program that accesses information from external sources, including the use of any communications software, accessing any bulletin board or online service or use of the Internet.
- xxii. Employees may not use password protection or encryption (coding) software or similar protections on any system or file without express prior approval from the Company. Where permission is provided, the password must be provided to the Security Officer. The use of any type of encryption scheme or password, whether or not authorized, in no manner restricts the Company's rights to monitor use of Company -provided technologies (see Technology Policy).
- xxiii. Where passwords and sign-on codes are in place, users may not share their passwords except to the extent required to comply with this Security

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Policy. Passwords should be guarded and not written or accessible on or near the equipment. Users who have access to the Company's systems through remote technology should take special precautions to ensure that their equipment is not used in an unauthorized manner or by unauthorized individuals.

- xxiv. Whenever information is provided to anyone outside the Company's location in electronic form, such information must be encrypted and/or password protected.
- xxv. Employees who log into the Company's systems by way of a wireless communication must be securely configured and certified by an IT Specialist. If a user has any questions, he or she should contact IT.

### *External Security*

To combat external risks to security, confidentiality and/or integrity of any electronic paper or other records containing Protected Personal Information, and evaluating and improving, where necessary, the effectiveness of the current safeguards for limiting such risks, the following measures are mandatory and are effective immediately.

- i. There must be reasonably up-to-date firewall protection and operating system security patches, reasonably designed to maintain the integrity of the personal information, installed on all systems processing Protected Personal Information.
- ii. There must be reasonably up-to-date versions of system security agent software which must include malware protection and reasonably up-to-date patches and virus definitions, installed on all systems processing Protected Personal Information.
- iii. To the extent technically feasible, all personal information stored on laptops or other portable devices must be encrypted, as must all records and files transmitted across public networks or wirelessly, to the extent technically feasible. Encryption here means the transformation of data into a form in which meaning cannot be assigned without the use of a confidential process or key, unless further defined by regulation by the Massachusetts Office of Consumer Affairs and Business Regulation.
- iv. All computer systems must be monitored for unauthorized use of or access to personal information.
- v. There must be secure user authentication protocols in place, including: (a) protocols for control of user IDs and other identifiers; (b) a reasonably secure method of assigning and selecting passwords, or use of unique identifier technologies, such as biometrics or token devices; (c) control of data security passwords to ensure that such passwords are kept in a secure location.

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### *Reporting Security Breaches*

The Company will mitigate any harm caused by unauthorized disclosures of Protected Personal Information and will notify affected clients and individuals when security breaches occur.

When an employee of the Company knows or has reason to know (1) of a Security Breach, or (2) that the Protected Personal Information was acquired or used by an unauthorized person or for an unauthorized purpose, that employee must notify the Security Officer immediately. The Security Officer will notify the Attorney General and the Office of Consumer Affairs and Business Regulation of that breach or unauthorized acquisition or use.

A “Security Breach” is the unauthorized acquisition or unauthorized use of unencrypted data or, encrypted electronic data and the confidential process or key that is capable of compromising the security, confidentiality, or integrity of Protected Personal Information, maintained by the Company that creates a substantial risk of identity theft or fraud against an individual. A good faith but unauthorized acquisition of personal information by a person or agency, or employee or agent, for the lawful purposes of such person or agency, is not a Security Breach unless the Protected Personal Information is used in an unauthorized manner or subject to further unauthorized disclosure.

“Encrypted” is defined as the transformation of data through the use of a 128-bit or higher algorithmic process into a form in which there is a low probability of assigning meaning without use of a confidential process or key, unless further defined by regulation of the Department of Consumer Affairs and Business Regulation.

### *Training*

The Security Officer (or his/her designee) will provide training for all employees who use or disclose Protected Personal Information. Furthermore, the Security Officer (or his/her designee) will provide annual training for all managers, employees, and independent contractors, including temporary and contract employees, who have access to Protected Personal Information on the elements of this Security Policy with the appropriate level of security training as required. All attendees at such training sessions are required to certify their attendance at the training and their familiarity with the Company’s requirements for ensuring the protection of Protected Personal Information.

### *Responsibility and Disciplinary Actions*

Each eligible employee has a duty to the Company to comply with the terms and conditions of this Security Policy. Any violations of this Security Policy must be reported to the Company or Security Officer.

Violations are subject to disciplinary action, up to and including termination of  
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employment. Disciplinary action will be based on the severity of the violation(s) and the number of violations.

If any employee has a question with regard to this Security Policy, he or she should consult privately and confidentially with the Security Officer.

### **TECHNOLOGY POLICY**

253 Organic, LLC provides certain employees with computer and telephone equipment and a variety of technologies, including the capability to send or receive voice mail and electronic mail (“E-mail”) and access to several online services and other external resources. Unauthorized use of telephone and computer equipment can threaten the ability of these systems to operate properly and potentially subject the user and the Company to certain liabilities.

All messages created, sent or retrieved over the Company’s computer and telephone equipment are the sole property of the Company and not the employees. The Company reserves the right to access, search, inspect, copy, delete and disclose any message, communication or file on any voice mail, e-mail or computer system owned or operated by the Company at any time or for any reason. The Company also reserves the right to access, search, inspect, copy, delete and disclose any file stored in any electronic form or any other medium located on Company property or kept with files or equipment that belong to or are provided by the Company at any time for any reason. The Company may also monitor telephone calls to assure quality. All equipment, software, files, disks, diskettes, communications or messages created, maintained or sent or received on any system or storage device provided by the Company are considered Company property.

Confidential information and trade secrets of the Company are not to be disclosed to any third person in any manner whatsoever, including without limitation, by electronic means, under any circumstances. Further, because cell phones, e-mail and voice mail are not completely secure, the utmost discretion should be used before sending and storing confidential or sensitive information, and, if at all possible, the most secure mode of transmission and storage should be used in accordance with the Company’s Security Policy. If there are questions regarding which mode, of transmission is appropriate, please contact the Security Officer.

Employees may not use the Company’s equipment to send or receive messages in violation of federal or state law, in violation of Company policy (*e.g.*, the Security Policy), in violation of the intellectual or other property right or interest of another or in any inappropriate, discriminatory or unauthorized manner. As an example and not by way of limitation, messages that are profane, vulgar, harassing, defamatory or promote a user’s personal beliefs on non-business issues are prohibited. Use of Company -provided resources in violation of this policy will result in disciplinary action, up to and including termination. The Company, in its sole discretion, may advise appropriate law enforcement officials of any suspected violations of law without the prior consent of the

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sender or receiver of a communication or any other person.

### **CONFIDENTIAL AND PROPRIETARY INFORMATION**

The Company considers its confidential and proprietary information and trade secrets, including the confidential and proprietary information and trade secrets of our customers, to be one of its most valuable assets. As a result, employees must carefully protect and must not disclose to any other party at any time (including after any termination of employment) any confidential and proprietary information and trade secrets belonging to the Company or its customers except to the extent necessary to perform your duties for the Company or its clients or with the prior written consent of the Director of Operations. Such protected information includes, but is not limited to, the following examples:

- i. Personal or financial information regarding the principals, officers, directors or managers and their affiliated and/or related entities,
- ii. Personnel information
- iii. Any information relating to individuals, businesses or other entities which the Company has established a business or working relationship,
- iv. Customer or vendor lists and information,
- v. Financial information,
- vi. Business strategies,
- vii. Marketing strategies,
- viii. Contemplated or pending projects,
- ix. Proprietary business processes,
- x. Development and acquisition plans,
- xi. Research and development strategies,
- xii. Formulas, recipes, and product ingredients, and
- xiii. Any other proprietary information whether communicated orally or in documentary, computerized or other tangible form, concerning the Company's or its clients' operations and business.

The removal of materials, documents, files, records and other property belonging to the Company from the premises is not encouraged. However, if you must do so, please remember that confidential and proprietary information and trade secrets must be safeguarded at all times. Any electronic files you access remotely must also be safeguarded at all times.

Employees should ensure that any materials containing confidential or proprietary information are filed and/or locked up before leaving their work areas each day. During the workday, employees should not leave any sensitive information lying about or unguarded.

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Employees who improperly use or disclose trade secrets, confidential or proprietary business information will be subject to disciplinary action, up to and including termination of employment, even if they do not actually benefit from the disclosed information. Neither these guidelines nor any terms set forth in a nondisclosure agreement shall be limiting to the other. Rather, each shall be construed broadly so as to compliment each other to provide the broadest protection for the Company's activities.

All Company property, including any materials containing confidential information, must be surrendered immediately upon notice of termination or demand.

If you have any questions about this policy, consult the Director of Operations.

### **RULES OF CONDUCT AND PROGRESSIVE DISCIPLINARY PROCEDURE**

There are reasonable rules of conduct which must be followed in any organization to help a group of people work together effectively. The Company expects each employee to present himself or herself in a professional appearance and manner. If an employee is not respectful and considerate of others and does not observe reasonable work rules, disciplinary action will be taken.

Depending on the severity or frequency of the disciplinary problems, a verbal or written reprimand, suspension without pay, disciplinary probation, or discharge may be necessary. It is within the Company's sole discretion to select the appropriate disciplinary action to be taken. Notwithstanding the availability of the various disciplinary options, the Company reserves the right to terminate an individual's employment with the Company at its discretion, with or without notice.

The following is not a complete list of infractions for which an employee may be subject to discipline, but it is an example of those infractions that may result in immediate discipline, up to and including termination of employment, for a single offense:

- i. Excessive absenteeism (or absence without notice) or lateness (or lateness without notice).
- ii. Unsatisfactory performance or conduct.
- iii. Smoking anywhere on the property.
- iv. Chewing gum and/or eating in areas of the property where it is prohibited such as on the production floor.
- v. Use of cell phones for any purpose while working.
- vi. Dishonesty, including falsification of timecards and other Company-related documents, or misrepresentation of any fact.
- vii. Fighting, disorderly conduct, horseplay, or any other behavior which is dangerous or disruptive.
- viii. Cursing in the workplace.

- ix. Possession of, consumption of, or being under the influence of alcoholic beverages while on Company or customer premises or on Company business.
- x. Illegal manufacture, distribution, dispensation, sale, possession, or use of illegal drugs or unprescribed controlled substances.
- xi. Reporting for work with illegal drugs or unprescribed controlled substances in your body.
- xii. Possession of weapons, firearms, ammunition, explosives, or fireworks on Company premises (including parking areas) or customer premises.
- xiii. Failure to promptly report a workplace injury or accident involving any of the Company's employees, visitors, equipment, vehicles, or property.
- xiv. Commission of a crime, or other conduct which may damage the reputation of Company.
- xv. Use of profane language while on Company business.
- xvi. Stealing, misappropriating, or intentionally damaging property belonging to the Company or its visitors or employees.
- xvii. Unauthorized use of the Company's or its customers' name, funds, equipment, or property, including telephone, mail system or other employer-owned equipment.
- xviii. Insubordination, including failure to comply with any work assignments or instructions given by any Company employee with the authority to do so unless such assignment or instruction violates Company policies or federal or state law.
- xix. Violation of the Company's Equal Employment Opportunity Policy or its Harassment Policy.
- xx. Interference with the work performance of other employees.
- xxi. Failure to utilize Company machinery or equipment in accordance with the manufacturer's specifications.
- xxii. Failure to cooperate with an internal investigation, including, but not limited to, investigations of violations of these work rules.
- xxiii. Failure to maintain the confidentiality of proprietary information belonging to the Company or its customers.
- xxiv. Failure to comply with the Company's personnel policies and rules.
- xxv. Disqualification or expiration of Registered Agent Identification Card.

## **RE-EMPLOYMENT**

As a general rule, the Company will not rehire former employees who:

- i. Were dismissed by the Company;
- ii. Resigned without giving two weeks' notice;
- iii. Were dismissed for inability to perform job duties;
- iv. Had a poor attendance record; or
- v. Violated work rules or safety rules.

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## **MOONLIGHTING/DAYLIGHTING**

The Company discourages our employees from taking additional outside employment. Employees who wish to take on outside employment must first obtain permission from the Director of Operations. Work requirements for the Company, including overtime, must take precedence over any outside employment.

The Company will not permit any employee to take an outside job with an employer in the same or related business as the Company, or which is in any way a competitor of the Company. Employees are not permitted to work for any customer of the Company outside of the regular working hours.

If the Company permits an employee to take outside employment, the employee must report to the Director of Operations when the outside job has started. If you are unable to work when requested by the Company (including overtime), or unable to maintain a high work performance level at the Company, permission to work at the outside job may be rescinded, or your employment with the Company may be terminated.

Employees are expected to be engaged in services and activities for the Company while at work. You may not engage in outside activities during working hours (*i.e.*, daylighting).

## **BENEFITS**

### **WORKERS' COMPENSATION BENEFITS**

The Company purchases workers' compensation insurance for employees who suffer accidental injuries or occupational diseases arising out of and in the course of employment. Benefit coverage and medical payments will be in accordance with the requirements of the Massachusetts Workers' Compensation law.

In the event of an accident or injury, you must notify the Director of Operations immediately, no matter how minor the incident or accident may appear. Depending on the severity of the injury, the injured employee may be referred to an emergency room or a local clinic.

If you are injured, you must complete the necessary accident/incident reports within 24 hours of the injury. The Company reserves the right to require that you be tested for the presence of drugs or alcohol after any accident.

### **VACATION TIME**

The Company provides its full-time employees with vacation time each year as a way to express our appreciation and a way to renew and refresh our employees. Because {99913/A0320671.2}



our business can experience strict deadlines on projects, the Company reserves the right to grant vacations at times that are most suitable for our business conditions and to limit vacations during our busy times.

To qualify for vacation, a full time employee must complete 90 days of continuous employment.

If you are a full-time employee hired:	You may use up to:
Prior to the current calendar year	40 hours of vacation between January 1 and December 31.
Between January 1 and June 30 of the current calendar year	40 hours of paid vacation between your date of hire and December 31.
Between July 1 and September 30 of the current calendar year	20 hours of vacation between your date of hire and December 31.
Between October 1 and December of the current calendar year	0 hours of vacation between your date of hire and December 31.

Employees must use all vacation in the calendar year in which it is granted. It should be scheduled and approved by the Human Resources Manager at least two weeks in advance. Any unused vacation will be forfeited at the end of each calendar year. The Human Resources Manager may at his/her discretion allow employees to carry over unused vacation into a subsequent calendar year.

Upon termination of employment for any reason, employees are paid for any accrued but unused vacation during that calendar year.

Part-time, temporary and seasonal employees are not eligible for vacation.

### **SICK TIME**

Employees who work 80 or more hours for the Company during a calendar year are entitled to paid sick leave for the care and treatment of themselves or a family member. Eligible employees accrue 1 hour of paid sick leave for every 30 hours worked up to a maximum of 40 hours of paid sick leave per calendar year.

An employee may use earned sick time:

- i. To care for the employee's child, spouse, parent, or parent of a spouse, who suffers from a physical or mental illness, injury, or medical condition

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- that requires home care, professional medical diagnosis or care, or preventative medical care;
- ii. To care for the employee's own physical or mental illness, injury, or medical condition that requires home care, professional medical diagnosis or care, or preventative medical care;
- iii. To attend regular medical appointments for the employee or the employee's child, spouse, parent, or parent of a spouse;
- iv. To address the psychological, physical, or legal effects of domestic violence; and
- v. To travel to and from an appointment, a pharmacy, or other location related to the purpose for sick leave was taken.

If the need is foreseeable, the employee must provide 7 days advance notice of his/her intention to use sick leave. If the need is not foreseeable, the employee must notify his/her supervisor as soon as practicable. Calling or texting a co-worker is not appropriate notification.

Employees may roll over up to 40 hours of paid sick leave to the next calendar year. In no event, however, will an employee be able to take more than 40 hours of paid sick leave during a calendar year.

Upon termination of employment for any reason, employees are not paid for any accrued but unused sick leave during that calendar year.

## **LEAVES OF ABSENCE**

### *Parental Leave*

Parents, who have completed at least ninety (90) consecutive days of full-time employment with the Company, may take an unpaid leave of absence for the purpose of giving birth or adopting a child under the age of eighteen (18) (or for adopting a child under the age of twenty-three (23) if the child is mentally or physically disabled) up to a period of eight (8) consecutive weeks. Employees must provide at least two weeks notice of the anticipated date of departure and the employee's intention to return. If the need is not foreseeable, the employee must provide notice as soon as practicable if the reason for the delay is beyond the employee's control.

At the end of the bonding leave, the employee will be reinstated to his/her previous or similar position with the same status, pay, benefit accrual and seniority as of the date of his/her leave unless business necessity makes this impossible or unreasonable and the leave exceeds eight (8) weeks.

### *Jury Leave*

Employees who are called for jury duty will be granted time off with pay to perform this civic duty. Employees must notify the Director of Operations as soon as they learn they have been summoned as a juror so that work arrangements can be made. In order to be paid for Jury Leave, an employee must provide the Director of Operations with the jury summons and a note from the Clerk of the Court indicating the times the employee was in court for jury duty. The Company will pay employees straight time for their regularly scheduled hours of work, minus the compensation they received from the court for their service as jurors, for up to five days of jury service. An employee who is excused from jury duty prior to the end of a regularly scheduled workday must report for work for the remainder of that day, or otherwise notify the Director of Operations of his or her availability to work.

### *Military Leave*

The Company will grant employees called into military service an unpaid leave of absence and reemployment rights as provided by the laws of the United States.

Employees in the military reserve or National Guard will be granted two-weeks off to fulfill their annual two-week training obligation. Upon submission of military pay vouchers, employees will be paid the difference between military pay and their regular base pay for such two-week training period.

In addition, new FMLA regulations include two types of military family leave referred to as “qualifying exigency leave” and “military caregiver leave”. Employees should speak with the Director of Operations regarding military leave. Reinstatement following military leave will be in compliance with state and federal law.

### *Voting Leave*

Generally, employees should vote before or after regularly scheduled work hours. However, employees may request unpaid leave, if needed, to vote during the first two hours after the polls open.

### **PARKING**

Parking at the Company in designated areas is available for all employees. Employees should consult their supervisor for the location assigned to them. The Company will not be liable for damage, theft, or other destruction of an employee’s property while utilizing the parking lot.

## **ACKNOWLEDGEMENT OF RECEIPT OF EMPLOYEE HANDBOOK**

I have received the current employee handbook maintained by 253 Organic, LLC (the “Company”) and have read and understand the material covered. I have had the opportunity to ask questions about the policies in this handbook, and I understand that any future questions that I may have about the handbook or its contents will be answered by the Human Resources Manager upon request. I agree to and will comply with the policies, procedures, and other guidelines set forth in the handbook. I understand that the Company reserves the right to change, modify, or abolish any or all of the policies, benefits, rules, and regulations contained or described in the handbook as it deems appropriate at any time, with or without notice. I acknowledge that neither the handbook nor its contents are an express or implied contract regarding my employment.

I further understand that all employees of the Company, regardless of their classification or position, are employed on an at-will basis, and their employment is terminable at the will of the employee or the Company at any time, with or without cause, and with or without notice. I have also been informed and understand that no officer, agent, representative, or employee of the Company has any authority to enter into any agreement with any applicant for employment or employee for an employment arrangement or relationship other than on an at-will basis and nothing contained in the policies, procedures, handbooks, or any other documents of the Company shall in any way create an express or implied contract of employment or an employment relationship other than one on an at-will basis.

This handbook is Company property and must be returned upon termination of employment.

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Signature

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Date

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Employee Name: Printed

## **253 Organic, LLC Diversity Plan (January 2019)**

This Diversity Plan (“Plan”) by 253 Organic, LLC (“253”) is a supplement to the *253 Organic, LLC Management Operations and Policies* and the *253 Organic, LLC Employee Handbook, revised August 1, 2018*. It is designed to comply with 935 CMR 500.101(e), which requires every applicant to have a diversity plan to promote equity among minorities, women, veterans, people with disabilities, people of all gender identities and sexual orientation; note, however, that 253 desires to go above and beyond what is required by statute to also reach out to immigrants, persons who speak English as a second language, single parents, and caregivers (“Diverse Community”).

As of this writing, 253 estimates that it will have the following hiring needs. These needs may change over time.

- 15-18 employees in its Cultivation Facility
- 8-10 employees in its Retail Facility
- 3-5 employees in its Manufacturing Facility

### **Goals**

In general, the goal of this Plan is to promote diversity at all levels of 253, including in entry level, hiring, promotion, and managerial. As a long-term goal, 253 will be recognized as a leader for providing job opportunities, job growth, training and managerial opportunities to the Diverse Community in a caring, nurturing holistic environment where the employee is valued and his or her insight is sought to improve 253, its product, work environment and community.

#### Short-term goal:

- By three years from the date that all three of 253’s facilities are open for business, 253’s workforce will be comprised of 50% female and minority employees.

\* Note that 253 has already reached out to the El Salvadoran community in Hampshire county.

### **Programs**

In an effort to reach qualified community members for employment opportunities, 253 will conduct the following programs. These programs will be conducted at least twice per year, and certain programs will be conducted quarterly.

1. Conduct career fairs for members of the Diverse Community.
2. Schedule and conduct formal interviews with individuals from the Diverse Community.
3. Offer job skill assessments and provide guidance for interested employees to receive leadership and/or managerial training relevant to leadership positions.

4. Conduct internal training sessions regarding embracing diversity, and promoting an open dialogue regarding inclusion, training events designed to bring awareness about diversity.

### **Measurement and Accountability**

253 will use both qualitative and quantitative measures to track progress and determine whether the above-stated goals are achieved. 253 will track the following year over year:

- Number of people from the Diverse Community attending job fairs held by 253.
- Number of people from the Diverse Community with whom 253 conducted formal interviews.
- Number of employees from the Diverse Community to whom 253 offered job skill assessments and guidance to receive leadership and/or managerial training relevant to positions.
- 253 will perform staff surveys about the implementation of its Programs, analyze results, identify areas for improvement, and take corrective steps.
- Track diversity within 253 through internal demographic data.
- Periodic audits for pay equity.

### **Table Of Contents;**

- A) Hours of Operation**
- B) Job Descriptions and Employment Contracts**
- C) Terms**
- D) Business Records and Retention**
- E) Inventory Control**
- F) Labeling of Marijuana and Marijuana products**
- G) Packaging and Storage**
- H) Audits**
- I) General**
- J) Cleaning/Sanitation/Quality Control**
- K) Agent Registry Identification Card and Requirements**
- L) Physical Plant and Requirements of Dispensary and Cultivation/MFG Location**
- M) Security**
- N) Transportation**
- O) Additional Retail Procedures**
- P) Additional Product Manufacturing Procedures**
- Q) Additional Information on Cultivation**
- R) Banking/ Cash Procedure**

## **A) Hours of Operation**

*The Cultivation, Product Manufacturing location will be operating between the hours of 7:00 a.m. And 6:00 p.m.*

*The Retail Dispensary location will be operating between the hours of 9:00 a.m. to 8:00 p.m. Monday thru Saturday. 11:00 a.m. to 4 p.m. Sunday.*

## **B) Job Descriptions and Employment Contracts**

*Attached as Exhibit A are the Job Descriptions of key positions within the Facilities. Each description includes a more detailed description of the Personnel Duties and Responsibilities, Authority, and Qualifications of each position. Those positions include:*

- a. Director of Operations
- b. Director of Sales
- c. Cultivation Manager
- d. Dispensary Manager
- e. Kitchen Manager
- f. Extraction Manager
- g. Inventory/ Quality Control Supervisor

## **2. Personnel Supervision**

*The CEO is responsible for all employee supervision at the Company. There will be three intermediary managers who report to the Director of Operations. All cultivation employees will report to the Cultivation Manager. All kitchen employees will report to the Kitchen Manager. All extraction employees will report to the Extraction Manager. All Dispensary employees will report to the Dispensary Manager who in turn reports to the Director of Sales.*

## **3. Training & Confidentiality 935 CMR 500.105 (B)**

*The Cultivation, Kitchen, Extraction, Dispensary Managers will conduct in-person and hands-on training for all new employees upon hire and for all current employees no less than annually, within the cultivation building. The Dispensary Manager will conduct in-person and hands-on training for all new employees upon hire and for all current employees no less than annually, within the Dispensary building. Such training will cover no less than 8 hours of instruction and will be documented with sign in and sign out sheets for every employee that indicate the time, date, place and substance of such training. Attached as Exhibit M is a copy of the Employee Training Acknowledgement Form. Training topics conducted by the Manager(s) will include:*

### **3.a.Employee Handbook and Job Descriptions**



## 253 Organic, LLC Management Operations and Policies

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3.b. Employment Laws and Employee Rights

3.c. Cultivation Operations and Administration as detailed in (935 CMR 500.105)

3.d. Kitchen/Extraction Operations and Administration as detailed in (935 CMR 500.105)

3.e. Dispensary Operations and Administration as detailed in (935 CMR 500.105)

3.f. Responsible Vendor Training (935 CMR 500.105 (2) (b))

### 4. Performance Evaluations

*The Manager(s) will conduct in-person employee performance evaluations for all new employees after 6 months of employment and for all current employees no less than annually, within the cultivation building. Performance evaluations will be recorded on the Employee Performance Evaluation Form attached as Exhibit C.*

### 5. Disciplinary Actions

*The Manager(s) will be responsible for taking disciplinary actions against any employee. The Managers will follow the guidelines of the Progressive Discipline Policy attached as Exhibit D. Disciplinary action will be documented by the Manager(s) according to the requirements of the attached Progressive Discipline Policy and regulations promulgated by the Commission.*

### 6. Employment Contracts

*The Company will not utilize written employment contracts with any of its employees. All of the Companies employees will be employed under verbal at-will contracts, subject to the terms and conditions of the Employee Handbook attached as Exhibit E.*

## C) Terms

1. Marijuana will also be referenced in this document as “cannabis”
2. Cultivation, Kitchen, Extraction will be referenced as “Cultivation” as they are in the same building
3. Employee's with approved Marijuana Establishment Agent Registration Card will be referred to as “agent(s)”
4. 253 Organic, LLC will be referred to as “Company” and refers to activities of Cultivation, Dispensary, Kitchen and Extraction.

5. Retail Dispensary will be referred to as “ Dispensary”

6. Cultivation, Dispensary, Kitchen and Extraction individually are referred to as a “site(s)”

**D) Business Records and Retention (935 CMR 500.105 (I))**

**1. Records**

*The Companies business records shall be created, stored, maintained and retained by the Dispensary in accordance with all rules and regulations promulgated by the Commission, and applicable City and County Ordinances, as well as any other applicable rules, regulations and laws. The Company will maintain business records according to the requirements of the Document Retention Policy attached as Exhibit F. Maintained business records will include, but not be limited to the following items:*

- a. Corporate Records
- b. Accounting and Financial Records
- c. Correspondence and Internal Memoranda
- d. Electronic Documents
- e. Legal Files and Papers
- f. Insurance Records
- g. Payroll Documents
- h. Personnel Records
- i. Property Records
- j. Tax Records
- k. Media/Marketing Materials
- l. Miscellaneous Records

**2. Retention**

*The Company will maintain the inventory control documentation and records described above at the dispensary in compliance with the Document Retention Policy attached as Exhibit F for at least five years from the date on the inventory control document, and upon request, provide the required inventory control documentation to the Commission for review in either electronic or print format. The Companies inventory control documentation and records will include all categories of documents listed in Section II (Accounting and Financial Records) of the Document Retention Policy and will be stored both within the cultivation's electronic servers and the internet-based METRC inventory control system.*

*a.a. Method(s)*

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*The method of the Companies business record retention will depend on the type of business record to be retained. The Business Record Retention Policy attached at Exhibit F lays out in great detail the method of retention for a given business record.*

### b. Time-Frame

*The time-frame of the business record retention will depend on the type of business record to be retained. The Business Record Retention Policy attached at Exhibit F lays out in great detail the time-frame of retention for a given business record.*

## **E) Inventory Control (935 CMR 500.105 (H)(3)(4))**

*The Company has contracted with and will utilize at all times a comprehensive internet-based cannabis inventory control system known as METRC.*

### **1. Inventory Control System**

*The Companies inventory control system, known as METRC, is an internet-based comprehensive cannabis inventory and sales tracking system that is guaranteed to comply with all Commission's regulations pertaining to the cultivation, processing, tracking, identification, transfer, transportation and sale of cannabis. The METRC inventory control system is both Cultivation, Infused Products, Dispensary, Extraction focused, allowing for:*

- a. Tracking of every cannabis plant, nutrient, watt, drop and yield within the Dispensary or its cultivation site
- b. Tracking of every cannabis plant from seed to sale
- c. Tracking of nutrients, schedules, yields, environmental variables and grow costs
- d. Capture of historical data and test results
- e. Provision of batch and plant tracking
- f. Creation of Commission approved dispatch and trip plans
- g. Tracking of shake, spillage, evaporation, edibles, concentrates and any theft
- h. Conduct Monthly and annual inventory audits

*The Site's will document each day's beginning inventory, acquisitions, harvests, sales, disbursements, disposal of unusable cannabis, and ending inventory by requiring its agents to input all such information into the METRC inventory control system on a daily basis. The Site's agents will also be required to input into the METRC inventory control system, on a daily basis, all information pertaining to:*

- a. Acquiring cannabis from another cultivation facility
- b. Acquiring cannabis from another dispensary or another dispensary's cultivation site

- c. Each batch of cannabis cultivated by the Dispensary's cultivation site
- d. Provision of cannabis to another dispensary
- e. Receiving cannabis infused edible products from another dispensary

## **2. Disposal of Unusable Cannabis (935 CMR 500.105)**

*The Company will establish and implement an inventory control system for the cannabis that documents the disposal of cannabis that is not usable cannabis. The Site's will require the use of the Cannabis Disposal Form attached as Exhibit G to document any such disposal, which will include the description of and reason for the cannabis being disposed of including, if applicable, the number of any failed or unusable plants; the date of disposal; the method of disposal; the name and registry identification number of the site agent responsible for the disposal. The Company will contract with one or more waste removal companies in compliance to (935 CMR 500.105 (L)) to provide the cultivation with an on-site waste refuse container, into which any responsible dispensary agent will deposit any cannabis that is not usable, as well as remove the contents of the on-site waste refuse container on a continuous basis and dispose of it as waste is customarily disposed of by waste removal companies.*

## **3. Designated Agent For Inventory Control**

*The Site(s) Manager(s) will have oversight of, and maintain, their site's cannabis inventory control system.*

## **4. Methods of Acquiring Cannabis**

*The Dispensary will in general acquire cannabis from the Cultivation site, another dispensary or another dispensary's cultivation site. The Dispensary/Cultivation will not acquire cannabis from any other source.*

***Procedure:*** *The Dispensary/Cultivation will follow the methods listed below in the event of any acquisition or provision of cannabis or related products:*

- a. Acquiring cannabis from another dispensary or another dispensary's cultivation site:

After approval by the Dispensary Manager or Director of Sales, all such acquisitions will take place either within the Dispensary building by physical delivery from a dispensary agent of another dispensary, or outside the Dispensary building (including within the building of another dispensary or another dispensary's cultivation site), if and only if, acquired by one of the Dispensary's dispensary agents and documented by a trip plan as required by the Commission's regulations. The Dispensary's Manager or the Director of Sales will inspect and approve or reject all deliveries of cannabis into the Dispensary's building, whether from a dispensary agent of another dispensary or from the Dispensary's own dispensary agent bringing such acquisition into the Dispensary's building. The Dispensary will utilize its METRC inventory control

system to document its acquisition of cannabis from a dispensary agent of another dispensary and will input all required information (see below) regarding such acquisition into the METRC system immediately upon receiving any cannabis into the Dispensary building and accepting such acquisition. The required information to be input by a dispensary agent upon any acquisition of cannabis from a dispensary agent of another dispensary will include:

1. A description of the cannabis acquired including the amount, strain, and batch number
2. The name and registry identification number of the dispensary and dispensary agent who provided the cannabis
3. The name and registry identification number of the dispensary agent receiving the cannabis on behalf of the dispensary
4. The date of acquisition.

b. Cannabis cultivated at the Cultivation site:

The Cultivation will utilize its METRC inventory control system to document its cultivation of cannabis at its cultivation site and will input all required information (see below) regarding such cultivation into the METRC system. The required information to be input by an agent pertaining to the cultivation of cannabis within the Cultivation site will include:

1. The batch number
2. Whether the batch originated from cannabis seeds or cuttings
3. The origin and strain of the cannabis seed or cutting planted
4. The number of cannabis seeds or cuttings planted
5. The date the cannabis seeds or cuttings were planted
6. A list of all chemical additives, including nonorganic pesticides, herbicides, and fertilizers used in the cultivation
7. Harvest information including the date of harvest, the final processed usable cannabis yield weight, the name and registry identification number of the dispensary agent responsible for the harvest
8. The disposal of cannabis that is not usable cannabis including the description of and reason for the cannabis being disposed of including, if applicable, the number of any failed or unusable plants; the date of disposal; the method of disposal; the name and registry identification number of the dispensary agent responsible for the disposal

c. Provision of cannabis to another dispensary:

After approval by the Dispensary's Manager or the Director of Sales, all such provisions will take place either within the Dispensary building by physical retrieval from a dispensary agent of another dispensary, or outside the Dispensary building (including within the building of another dispensary or another dispensary's cultivation site), if and only if, delivered by one of the Dispensary's dispensary agents, physically retrieved by a dispensary agent of another dispensary, and documented by a trip plan as required by the Department's regulations. The Dispensary's Manager or the Director of Sales will inspect and approve all provision of cannabis to another dispensary. The Dispensary will utilize its METRC inventory control system to document its provision of cannabis to a dispensary agent of another dispensary and will input all required information (see below) regarding such provision into the METRC system immediately upon releasing any cannabis from the Dispensary building. The required information to be input by a dispensary agent upon any provision of cannabis to a dispensary agent of another dispensary will include:

1. The amount, strain, and batch number of cannabis provided
2. The name and registry identification number of the other dispensary
3. The name and registry identification number of the dispensary agent who received the cannabis on behalf of the other dispensary
4. The date the cannabis was provided
5. The cannabinoid profile of the cannabis within the package, including THC and other cannabinoid levels

d. Receiving cannabis infused edible products from another dispensary:

After approval by the Dispensary's Manager or the Director of Sales, all such acquisitions will take place either within the Dispensary building by physical delivery from a dispensary agent of another dispensary, or outside the Dispensary building (including within the building of another dispensary or another dispensary's cultivation site), if and only if, acquired by one of the Dispensary's agents and documented by a trip plan as required by the Commission's regulations. The Dispensary's Manager or the Director of Sales will inspect and approve or reject all deliveries of cannabis infused edible products into the Dispensary's building, whether from an agent of another dispensary or from the Dispensary's own agent bringing such acquisition into the Dispensary's building. The Dispensary will utilize its METRC inventory control system to document its acquisition of cannabis infused edible products from an agent of another dispensary and will input all required information (see below) regarding such acquisition into the METRC system immediately upon receiving any cannabis infused edible products into the Dispensary building and accepting such acquisition. The required information to be input by an agent upon any

acquisition of cannabis infused edible products from an agent of another dispensary will include:

1. A description of the edible food products received from the dispensary including total weight of each edible food product and estimated amount and batch number of the cannabis infused in each edible product
2. Total estimated amount and batch number of cannabis infused in the edible food products
3. The name and registry identification number of the dispensary and the dispensary employee providing the edible food products to the receiving dispensary and dispensary agent receiving the edible food products on behalf of the receiving dispensary
4. The date the edible food products were provided to the Dispensary

### **F) Labeling of Marijuana and Marijuana Products.**

(a) Labeling of Marijuana Not Sold as a Marijuana Product. Prior to marijuana being sold or transferred we shall ensure the placement of a legible, firmly affixed label on which the wording is no less than 1/16 inch in size on each package of marijuana that it makes available for retail sale, containing at a minimum the following information:

Our name and registration number, together with the our business telephone number, electronic mail address, and website information, if any;

The quantity of usable marijuana contained within the package;

The date that the Marijuana Retailer or Marijuana Cultivator packaged the contents and a statement of which licensee performed the packaging;

A batch number, sequential serial number, and bar code when used, to identify the batch associated with manufacturing and processing;

The full cannabinoid profile of the marijuana contained within the package, including THC and other cannabinoid level;

A statement and a seal certifying that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15;

This statement, including capitalization: “This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN.”;

The following symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana product:



The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:



(b) Labeling of Edible Marijuana Infused Products. Prior to edible marijuana products being sold or transferred, we shall place a legible, firmly affixed label on which the wording is no less than  $\frac{1}{16}$  inch in size on each edible marijuana product that it prepares for retail sale or wholesale, containing at a minimum the following information:

1. Our name and registration number, together with our business telephone number, e-mail address, and website information, if any;

The name of the marijuana product;

Refrigeration of the product is required, as applicable;

Net weight or volume in US customary and metric units;

The quantity of usable marijuana contained within the product as measured in ounces;

The type of marijuana used to produce the product, including what, if any, processing technique or solvents were used;

A list of ingredients, including the full cannabinoid profile of the marijuana contained within the Marijuana Product, including the amount of delta-nine-tetrahydrocannabinol (9-THC) and other cannabinoids in the package and in each serving of a marijuana product as expressed in absolute terms and as a percentage of volume;

The serving size of the marijuana product in milligrams if the package is a multiple-serving package;

The number of serving sizes within the marijuana product based on the limits provided in 935 CMR 500.150;

The amount, in grams, of sodium, sugar, carbohydrates and total fat per serving;

The date of creation and the recommended “use by” or expiration date which shall not be altered or changed;

A batch number, sequential serial number and bar codes when used, to identify the batch associated with manufacturing and processing;

Directions for use of the marijuana product if relevant;

A statement and a seal that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15;

A warning if nuts or other known allergens are contained in the product;

This statement, including capitalization: “The impairment effects of edible products may be delayed by two hours or more. This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN”;

The following symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana product:





The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:



(c) Labeling of Marijuana Concentrates and Extracts. Prior to marijuana concentrates or extracts being sold or transferred, we shall place a legible,

firmly affixed label on which the wording is no less than 1/16 inch in size on each marijuana concentrate container that it prepares for retail sale or wholesale, containing at a minimum the following information:

The name and registration number of the product manufacturer that produced the marijuana product, together with the product manufacturer's business telephone number, e-mail address, and website information, if any;

The name of the marijuana product;

Product identity including the word "concentrate" or "extract" as applicable;

Net weight of volume expressed in US customary units and metric units;

The type of marijuana used to produce the product, including what, if any, processing technique or solvents were used;

A list of ingredients, including the full *Cannabinoid* profile of the marijuana contained within the Marijuana Product, including the amount of delta-ninetetrahydrocannabinol (9-THC) and other cannabinoids in the package and in each serving of a Marijuana Product as expressed in absolute terms and as a percentage of volume;

A statement of the serving size and number of servings per container or amount suggested for use based on the limits provided in 935 CMR 500.150;

The date of creation and the recommended "use by" or expiration date;

A batch number, sequential serial number, and bar code when used, to identify the batch associated with manufacturing and processing;

Directions for use of the marijuana product if relevant;

A statement and a seal that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15;

A warning if nuts or other known allergens are contained in the product;

This statement, including capitalization: “This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN.”;

The following symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana product:



The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:



(d) Labeling of Marijuana Infused Tinctures and Topicals. Prior to marijuana infused tinctures or topicals being sold or transferred the Marijuana Product Manufacturer shall place a legible, firmly affixed label on which the wording is no less than 1/16 inch in size on each container of marijuana infused tincture or topical that it prepares for retail sale or wholesale, containing at a minimum the following information:

1. Our name and registration number, together with our business telephone number, e-mail address, and website information, if any;

The marijuana product's identity;

The type of marijuana used to produce the product, including what, if any, processing technique or solvents were used;

A list of ingredients, including the full Cannabinoid profile of the marijuana contained within the Marijuana Product, including the amount of delta-ninetetrahydrocannabinol (9-THC) and other cannabinoids in the package and in each serving of a Marijuana Product as expressed in absolute terms and as a percentage of volume;

Net weight or volume as expressed in US customary units or metric units;

The date of product creation;

A batch number, sequential serial number, and bar code when used, to identify the batch associated with manufacturing and processing;

Directions for use of the marijuana product if relevant;

A statement and a seal that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15;

A warning if nuts or other known allergens are contained in the product;

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This statement, including capitalization: “This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN.”;

The following symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana product:



The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:



(e) In circumstances where the labeling of the marijuana product is unreasonable or impractical, we may include the labeling information on a peel-back label or may place the product in a sealed bag with an insert or additional, easily readable label firmly affixed to that bag.

### **G) Packaging/Storage (935CMR 500.105)**

*The Dispensary will package the great majority of its cannabis, and infuse and package all of its edibles, concentrates, at the cultivation site. After the opening of the Companies Cultivation site and on an ongoing basis, a large percentage of the Dispensary's cannabis will be packaged and stored in a safe room at the Companies Cultivation building in compliance to 935 CMR 500.110 (G)(I)(C)). With the exception of bulk packaged cannabis that will be transferred directly from the Companies Cultivation site to another dispensary or another dispensary's cultivation site, all usable cannabis cultivated at the Companies Cultivation site will be packaged and sealed in the exact amounts that it will be sold at the Dispensary's building (grams, fractions of ounces and full ounces). For the percentage of the Dispensary's cannabis that will be packaged at the Dispensary building, all such cannabis will be visually inspected and weighed in bulk by the General Manager to ensure the integrity of the cannabis in terms of strain, content, and amount. Thereafter, such cannabis will be broken down into smaller amounts (grams, fractions of ounces and ounces) and weighed to confirm weight accuracy. The cannabis will then be packaged and sealed into plastic bags of differing sizes that are transparent on one side, using a heat iron or packed into high-quality glass containers with a rubber air-tight seal around the circular opening of such glass containers. The cannabis will then be labeled with the required*

*labeling information (see below). All handling of cannabis throughout the acquisition, inspection, weighing, packaging and labeling process will be done by the Dispensary's agents under strict cleanliness, security and sanitary controls as required by the Commission's regulations (105 CMR 300.000). All labels affixed to the Dispensary's packaged cannabis will be placed either on the outside of the plastic bags or the glass container. The information on all such labels will include:*

- a. For all cannabis provided by the Dispensary to another Dispensary, the Dispensary will ensure that such cannabis is labeled with:
  1. The Dispensary's registry identification number
  2. The amount, strain, and batch number of marijuana
  3. The date of harvest or sale
  4. A list of all chemical additives, including nonorganic pesticides, herbicides, and fertilizers, used in the cultivation and production of the Cannabis

#### Packaging of Marijuana and Marijuana Products.

(a) Tamper or Child-resistant Packaging. We shall ensure that all marijuana products, other than those offered at wholesale by our sites, that are provided for sale to consumers we shall sell in tamper or child-resistant packaging. To be in compliance with 935 CMR 500.105(6), we shall ensure:

1. That to the extent it is not unreasonably impracticable for the specific type of product, marijuana products are packaged in containers that are
  - a. opaque or plain in design;
  - b. resealable for any marijuana product intended for more than a single use or containing multiple servings; and
  - c. certified by a qualified third-party tamper or child-resistant packaging testing firm that the packaging is in compliance with the most recent poison prevention packaging regulations of the US Consumer Product Safety Commission as included at 16 CFR 1700
2. That where compliance with the requirements of tamper or child-resistant packaging is deemed to be unreasonably impracticable, marijuana products shall be placed in an exit package that is:
  - a. capable of being resealed and made tamper or child-resistant resistant again after it has been opened;
  - b. includes the following statement, including capitalization, in at least ten-point Times New Roman, Helvetica or Arial font: KEEP OUT OF REACH OF CHILDREN; and
  - c. is certified by a qualified third-party tamper or child-resistant packaging testing firm that the packaging is in compliance with the most recent poison prevention packaging regulations of the US Consumer Product Safety Commission as included at 16 CFR 1700.

### (b) Limits on Packaging Design.

Packaging for marijuana products sold or displayed for consumers, including any label or imprint affixed to any packaging containing marijuana products or any exit packages, shall not be attractive minors.

Packaging is explicitly prohibited from:

- using bright colors, defined as colors that are “neon” in appearance;
- imitating or having a semblance to any existing branded consumer products, including foods and beverages, that do not contain marijuana;
- featuring cartoons;
- featuring a design, brand or name that resembles a non-cannabis consumer product of the type that is typically marketed to minors;
- featuring symbols or celebrities that are commonly used to market products to minors;
- featuring images of minors; or
- featuring words that refer to products that are commonly associated with minors or marketed to minors.

### (c) Packaging of Multiple Servings.

1. Packaging for marijuana products sold or displayed for consumers in multiple servings shall include the following statement on the exterior of the package in a printed font that is no smaller than ten-point Times New Roman, Helvetica or Arial, including capitalization: “INCLUDES MULTIPLE SERVINGS.”
2. Packaging for marijuana products in solid form sold or displayed for consumers in multiple servings shall allow a consumer to easily perform the division into single servings.
  - a. Edible marijuana products in a solid form shall be easily and permanently scored to identify individual servings.
  - b. Notwithstanding 935 CMR 500.105(6)(c)2.a., where a product is unable, because of its form, to be easily and permanently scored to identify individual servings, the product shall be packaged in a single serving size. The determination of whether a product is able to be easily and permanently scored shall be decided by the Commission consistent with sub-regulatory guidelines established by the Commission and provided to licensees.
3. Packaging for marijuana product beverages shall be packages solely in a single serving size. Multiple serving beverages are strictly prohibited for sale.
  - (a) Each single serving of an edible marijuana product contained in a multiple-serving package shall be marked, stamped or otherwise imprinted with the symbol issued by the Commission under 935 CMR 500.105(5) that indicates that the single serving is a marijuana product.
  - (b) Serving size shall be determined by the processor but in no instance shall an individual serving size of any marijuana product contain more than five milligrams of delta-ninetetrahydrocannabinol (9-THC).

## **H) Audits**

*The Site's Director of Operations will have oversight of the Companies inventory control and will conduct and document an audit of the companies inventory that is accounted for according to generally accepted accounting principles at least once every 30 calendar days. The Director of Operations will perform any audit by using reports generated from the METRC inventory control system that indicate the companies current inventory and comparing such reports to the individual site's actual physical inventory, which the Director of Operations will tally by physically counting the inventory and manually recording the totals. If a periodic inventory audit identifies a reduction in the amount of cannabis in the cultivation's inventory not due to documented causes, the Director of Operations will determine where the loss occurred and take and document corrective action using the Loss or Theft Report Form attached as Exhibit H. If any reduction in the amount of cannabis in the Site(s) inventory is due to suspected criminal activity by a dispensary agent, the Site(s) will report the dispensary agent to the Commission and to local law enforcement authorities and take and document corrective action using the Loss or Theft Report Form attached as Exhibit H.*

## **I) General**

### **1. Posting of Required Information**

*The Company will post the following information in a place that can be viewed by the individuals entering any site:*

- a. The Site's approval to operate;*
- b. The Site's registration certificate;*
- c. A list of all Board Members & Executives of 253 Organics and members will be made available upon request by an individual.*

### **2. Renewable Energy**

*All 253 sites will be purchasing renewable energy from the local utility company. We will also be configuring our lighting system to 480V using CMH technology. This reduces the current load by 65% compared to common practices in other Marijuana sites.*

### **3. Emergency Protocol**

*In the event of an emergency all employees are directed to immediately vacate the premise using the designated emergency exits.*

*The Director of Operations shall ensure that all postings are in place at all times during the Cultivation/Retail/Manufacturing operating hours and will conduct annual emergency drills.*

### 4. Policy and procedure Review

*The Company will review its policies and procedures at least once every 12 months from the issue date of its Site's registration certificate and update as needed. The Company will ensure that all policies and procedures maintained for inspection are the most recent versions with all revisions incorporated therein. The Company will use the Policies and Procedures Review Log attached as Exhibit I, which will be kept in a binder containing all policies and procedures in hard copy, available for inspection in the reception area of the cultivation/dispensary buildings in order to ensure timely review of its policies and procedures.*

### J) Cleaning /Sanitation / Quality Control

#### 1. Maintenance of Dispensary/Cultivation Building and Equipment

*The Cultivation/MFG will ensure that any building or equipment used by the Cultivation for the cultivation, harvest, preparation, packaging, storage, infusion, or sale of cannabis is maintained in a clean and sanitary condition. The Site's will maintain and enforce a routine cleaning schedule to ensure that the buildings and all equipment is maintained in a clean and sanitary condition.*

#### 2. Quality Control/Protection of Cannabis (935 CMR 500.000)

*The Cultivation/MFG site will ensure that cannabis in the process of production, preparation, manufacture, packing, storage, sale, distribution, or transportation is protected from flies, dust, dirt, and all other contamination. In addition to the use of sealed containers, the Cultivation will routinely test samples of cannabis in its possession for any contaminants listed above in addition to THC and cannabinoid profiles. In the event any such contaminants are detected, the cannabis will be disposed of in accordance to the policies and procedures herein.*

#### 3. Removal of Refuse or Waste ( 500.105 (L))

*The Company will ensure that refuse or waste products incident to the manufacture, preparation, packing, selling, distributing, or transportation of cannabis are removed from the buildings used at a site at least once every 24 hours or more often as necessary to maintain a clean condition. The Site's will develop and implement a plan for removal of refuse and waste approved by the Commission . The Site's will ensure that various agents will share the responsibility of removing refuse or waste each night before closing,*

*and when necessary. Cannabis remnants or by-products shall be disposed of according to an approved plan and not placed within the facility's exterior refuse container.*

#### **4. Cleaning of Equipment**

*The Cultivation will ensure that all trucks, trays, buckets, other receptacles, platforms, racks, tables, shelves, knives, saws, cleavers, other utensils, or the machinery used in moving, handling, cutting, chopping, mixing, canning, packaging, or other processes are cleaned daily. The Cultivation will ensure that various agents will share the responsibility of cleaning equipment each night before closing, and when necessary.*

#### **5. Protection of Edibles**

*The cultivation/kitchen will ensure that, if applicable, all edible foods are securely covered. The cultivation/kitchen will ensure that all edibles are properly packaged and kept in a secure manner to prevent airborne or contact contamination. All edible products shall be prepared, handled, and stored in compliance to sanitation requirements in 105 CMR 500.000 and "Good Manufacturing Practices for Food", and with the requirements for food handlers specified in 105 CMR 300.000*

#### **6. Agent Hand Cleansing**

*The Cultivation will ensure that while in the Cultivation site, an agent will clean their hands and exposed portions of their arms in a hand washing sink:*

- 1. Before preparing cannabis including working with food, equipment, and utensils;*
- 2. During preparation, as often as necessary to remove soil and contamination and to prevent cross-contamination when changing tasks;*
- 3. After handling soiled equipment or utensils;*
- 4. After touching bare human body parts other than the dispensary employee's clean hands and exposed portions of arms; and*
- 5. After using the toilet room.*

#### **7. Agent Hygiene**



*The Site's will ensure that while in the site, if working directly with the preparation of cannabis or the infusion of cannabis into non-edible products, an agent employee will:*

- 1. Keep fingernails trimmed, filed, and maintained so that the edges and surfaces are cleanable;*
- 2. Unless wearing intact gloves in good repair; not have fingernail polish or artificial fingernails on the agent's fingernails; and*
- 3. Wear protective apparel such as coats, aprons, gowns, or gloves to prevent contamination.*

### **8. Dispensary Employee Clothing**

*The Cultivation will ensure that while in the Cultivation site, an agent will wear clean clothing appropriate to assigned tasks.*

### **9. Reporting of Adverse Health Conditions**

*The Company will ensure that while in any site, an agent will report to the Director of Operations any health condition experienced by the agent that may adversely affect the safety or quality of any cannabis with which the agent may come into contact. The Company will ensure that all agents receive appropriate training regarding reporting adverse health conditions that the policy regarding reporting is enforced.*

### **10. Determination of Adverse Health Condition**

*If the Director of Operations determines that an agent has a health condition that may adversely affect the safety or quality of the cannabis and, the Site(s) will prohibit the agent from direct contact with any cannabis or equipment or materials for processing cannabis until determined that the employee's health condition will not adversely affect the cannabis. The Company will ensure that all agents receive appropriate training regarding reporting adverse health conditions and that the policy regarding reporting is enforced.*

### **K) Agent Registry Identification Card and Requirements**

#### **1. Possession of Agent Registry Identification Card**

*The Company will ensure that each site has the agent's registry identification card in the agent's immediate possession when the agent:*

- 1. Is working at the any site, or*
- 2. Is transporting cannabis for the Dispensary/Cultivation.*

***Procedure:*** *No agent shall enter the Dispensary/Cultivation sites without first showing his/her agent registry identification card to the agent overseeing access and proving that he/she is in actual possession of the registry identification card. The Director of Operations will periodically check with agents within the Dispensary/Cultivation building to verify that agents have their registry identification cards in their immediate possession.*

## **2. Agent Accompaniment/Diversion**

*The Site's will ensure that an agent accompanies any individual other than another company agent associated with the Site's when the individual is present in the enclosed, locked facility where cannabis is cultivated or processed.*

***Procedure:*** *Access to the Companies sites by individuals other than agents shall be supervised by the Director of Operations according to the following:*

- a. The Director of Operations must approve the entrance of any individual other than an authorized company agent into the Cultivation site.*
- b. Upon approval by the Director of Operations, an individual will be required to sign a logbook registering both the time in and the time out of the Cultivation site.*
- c. The Director of Operations will assign an agent to accompany the individual at all times that the individual is within the site.*
- d. The Director of Operations will ensure that upon exiting the Cultivation site, an accompanied individual will not have removed any cannabis or related products from the Cultivation site.*

## **3. Agent Registry Identification Card Requirement (500.030)**

*The Company will not allow an individual who does not possess an agent registry identification card issued under the appropriate Site(s) registration certificate to:*

- 1. Serve as a principal officer or board member for the Company;*
- 2. Be employed by the Company*

***Procedure:*** *Prior to opening, the Company will ensure that all above-listed individuals have received an agent registry identification card. Any above-listed individual that does not obtain such a card will not be permitted to: be in the Dispensary building, cultivation*

## 253 Organic, LLC Management Operations and Policies

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*site, extraction or kitchen, serve as a principal officer or board member for the Company, or be employed by the Company.*

#### 4. Notice of a Site's Agent Termination

*The Company will provide written notice to the Commission, including the date of the event within ten working days after the date, when a site agent no longer:*

- 1. Serves as a principal officer or board member for the Company;*
- 2. Is employed by the Dispensary, cultivation, extraction or kitchen;*

***Procedure:*** *The Company will maintain an automatic notification system for renewals of registry identification cards and ensure that all renewals are achieved prior to the expiration of any registry identification card for any of the individuals listed above. In the event that a site's agent changes status as described above, the Company will ensure that the Commission is immediately notified and it shall be the responsibility of the Director of Operations to do so.*

### L) Physical Plant and Requirements of Dispensary and Cultivation/MFG Location

#### 1. 1000 Feet From School ( Note: per federal guidelines)

*The Dispensary and its cultivation site are (and will always be) located at least 1000 feet from a private school or a public school that existed before the date the Dispensary or Cultivation submitted its initial dispensary registration certificate application.*

#### 2. Parking

*The Dispensary/Cultivation/Kitchen has onsite parking and parking adjacent to the Dispensary/Cultivation/Kitchen buildings.*

#### 3. Facility Amenities

*The Dispensary and its Cultivation/MFG sites have:*

- 1. At least one toilet room;*
- 2. Each toilet room shall contain:*
  - a. A flushable toilet;*

- b. Mounted toilet tissue;*
- c. A sink with running water;*
- d. Soap contained in a dispenser; and*
- e. Disposable, single-use paper towels in a mounted dispenser or a mechanical air hand dryer;*

*3. At least one hand washing sink not located in a toilet room;*

*4. Designated storage areas for cannabis or materials used in direct contact with cannabis separate from storage areas for toxic or flammable materials; and*

*5. If preparation or packaging of medical marijuana is done in the building, a designated area for the preparation or packaging that:*

- a. Includes work space that can be sanitized, and*
- b. Is only used for the preparation or packaging of cannabis*

#### **4. Commercial Weighing Devices**

*For each commercial device used at the Dispensary/Cultivation site, it will:*

- 1. Ensure that the commercial device is licensed and certified.*
- 2. Maintain documentation of the commercial device's license or certification, and*
- 3. Provide a copy of the commercial device's license or certification to the Commission for review upon request.*

#### **5. Maintenance of a Single, Secure Entrance**

*The Dispensary and Cultivation sites will have a single secure entrance. Through the use of a single, secure entrance into the site's building, the site's will implement appropriate security measures to deter and prevent the theft of cannabis and unauthorized entrance into areas containing cannabis.*

#### **6. Prohibition Against On-Site Consumption**

*The Company will not permit any person to consume cannabis on the property of the Site's. The Company will require that all employees sign a form stating that they understand the relevant policies and procedures and agree to abide by them, including the prohibition of consuming cannabis on the property of any site. The Site's will post signs inside the buildings and enforce the policy.*

## 253 Organic, LLC Management Operations and Policies

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### M) Security (935 CMR 500.110)

#### 1. Limited Access

*The Company will restrict access to the areas of the Dispensary/Cultivation site that contain cannabis and at the kitchen/extraction site, to authorized individuals only. No persons under the age of 21 are allowed into the body of the Cultivation, Dispensary, Kitchen, Extraction, not including the waiting room.*

**Procedure:** Access to Cultivation, Dispensary, MFG other than company agents shall be supervised by the Director of Operations/ Dispensary Manager to the following:

- e. The Director of Operations/Dispensary Manager must approve the entrance of any individual other than an authorized agent into any site.
- f. Upon approval by the Director of Operations/Dispensary Manager an individual will be required to sign a logbook registering both the time in and the time out of the site.
- g. The Director of Operations/Dispensary Manager will assign an agent to accompany the individual at all times that the individual is within the site.
- h. The Director of Operations/Dispensary Manager will ensure that upon exiting any site, an accompanied individual will not have removed any cannabis or related products from the site.

#### a. Unauthorized Access

*To prevent unauthorized access to cannabis at the Companies buildings, the buildings have security equipment to deter and prevent unauthorized entrance into limited access areas that includes devices or a series of devices to detect unauthorized intrusion, which may include a signal system interconnected with a radio frequency method, such as cellular, private radio signals, or other mechanical or electronic device. In addition, a burglar alarm shall be installed that will activate upon motion via entrance through the doors, glass, rooftop access and cover any shared wall. The alarm shall be monitored by an alarm company.*

#### b. Identification

*The Company will provide for the accurate and continuous identification of individuals authorized to enter the Site's.*

#### c. Security Equipment

*The Company has security equipment to deter and prevent unauthorized entrance into limited access areas that includes devices or a series of devices to detect unauthorized intrusion, which may include a signal system interconnected with a radio frequency method, such as cellular, private radio signals, or other mechanical or electronic device. In addition, a burglar alarm shall be installed that will activate upon motion via entrance through the doors, glass, rooftop*

*access and cover any shared wall. The alarm shall be monitored by an alarm company.*

*c.i.Intrusion Detection*

*The Company will comply with all Commission and City rules and regulations with regard to mandatory security and monitoring devices to prevent and detect unauthorized intrusion into the cultivation/dispensary building. The Company will contract with a security and alarm monitoring company to conduct in-person and remote surveillance of the cultivation/dispensary buildings on a 24/7 basis. In addition, during business hours, the Operations Manager will ensure that all electronically restricted access controlled doors are properly secured and set to alarm as a result of any unauthorized intrusion. During non-business hours, the Director of Operations will ensure that the security system is armed and operational by securing all interior doors, electronically restricted access doors, and the exterior door and setting the security system by way of a confidential access code.*

*c.ii.Exterior Lighting*

*To prevent unauthorized access to cannabis at any location around or in the buildings, the Company has security equipment to deter and prevent unauthorized entrance into limited access areas that includes exterior lighting to facilitate surveillance.*

***Procedure:*** *At a minimum, the Site's shall maintain lighting to provide a minimum of 2-foot candles of light throughout all parking lots and the exterior entrance of the Dispensary/Cultivation building. The Director of Operations will ensure that all such lights are properly working at all times.*

*c.iii.Electronic Monitoring*

*The Company will conduct electronic monitoring both in and around its site. The Company will conduct electronic video monitoring of all visitors in the parking lot and in the entry area of the Building site.*

***Procedure:*** *All customers entering the Cultivation shall remove their hats, sunglasses, and other similar objects, which obstruct physical identification. This shall not apply to clothing worn over the face for established religious reasons. At all times during business hours, our contracted security company will be tasked with monitoring the electronic video monitoring systems and responding to any issues of security or safety that may arise. To prevent unauthorized access to cannabis at the site, the site has security equipment to deter and prevent unauthorized entrance into limited access areas that includes electronic video and visual monitoring, including but not limited to:*

1. At least one 19 inch or greater call-up monitor;

2. A video printer capable of immediately producing a clear still photo from any video camera image;
3. Video cameras that: (1) Provide coverage of all entrances to and exits from limited access areas and all entrances to and exits from the building, capable of identifying any activity occurring in or adjacent to the building; and (2) Have a recording resolution of least at 704 x 480 or the equivalent;
4. A video camera in each grow room capable of identifying any activity occurring within the grow room in low light conditions;
5. Storage of video recordings from the video cameras for at least 90 calendar days;
6. A failure notification system that provides an audible and visual notification of any failure in the electronic monitoring system; and
7. Sufficient battery backup for video cameras and recording equipment to support at least five minutes of recording in the event of a power outage.

*The Director of Operations will be responsible for ensuring that all electronic video and visual monitoring security equipment is properly functioning at all times.*

### c.iv.Panic Buttons

*The Company will install and maintain working panic buttons in the interior of the Cultivation/Dispensary sites. All agents at the site will have access to and be made aware of the location of multiple panic buttons throughout the sites.*

***Procedure:*** *All Company employees will be trained on the specific location of panic buttons and the specific circumstances under which panic buttons should be used, including disorderly conduct, criminal invasion, and other security emergencies. The Director of Operations will ensure that all interior panic buttons are properly functioning at all times.*

### d. Loitering

*The Company will provide for the accurate and continuous identification of individuals authorized to enter any site.*

***Procedure:*** *The Dispensary/Cultivation site's will periodically monitor the public areas around the building site to ensure no loitering is taking place and escort individuals away from the public areas around the buildings in the event that any loitering occurs.*

## **N) Transportation**

### Transportation Between Marijuana Establishments.

(a) General Requirements.

253 shall, as an element of its license, be licensed to transport its marijuana products to other licensed establishments, except as otherwise provided herein.

Marijuana products will only be transported between licensed Marijuana Establishments by registered marijuana establishment agents.

The originating and receiving licensed Marijuana Establishments shall ensure that all transported marijuana products are linked to the seed-to-sale tracking program. For the purposes of tracking, seeds and clones will be properly tracked and labeled in a form and manner determined by the Commission.

Any marijuana product that is undeliverable or is refused by the destination Marijuana Establishment shall be transported back to the originating establishment.

All vehicles transporting marijuana products shall be staffed with a minimum of two marijuana establishment agents. At least one agent shall remain with the vehicle at all times that the vehicle contains marijuana or marijuana products.

Prior to leaving a Marijuana Establishment for the purpose of transporting marijuana products, the originating Marijuana Establishment must weigh, inventory, and account for, on video, all marijuana products to be transported.

Within eight hours after arrival at the destination Marijuana Establishment, the destination establishment must re-weigh, re-inventory, and account for, on video, all marijuana products transported.

When videotaping the weighing, inventorying, and accounting of marijuana products before transportation or after receipt, the video will show each product being weighed, the weight, and the manifest.

Marijuana products will be packaged in sealed, labeled, and tamper or child-resistant packaging prior to and during transportation.

In the case of an emergency stop during the transportation of marijuana products, a log will be maintained describing the reason for the stop, the duration, the location, and any activities of personnel exiting the vehicle.

We shall ensure that all transportation times and routes are randomized.

When transporting marijuana products we shall ensure that all transport routes remain within the Commonwealth.

All vehicles and transportation equipment used in the transportation of cannabis products or edibles requiring temperature control for safety must be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the cannabis products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c).

(b) Reporting Requirements.

Marijuana establishment agents must document and report any unusual discrepancy in weight or inventory to the Commission and law enforcement authorities not more than 24 hours of the discovery of such a discrepancy.

Marijuana establishment agents shall report to the Commission and law enforcement authorities any vehicle accidents, diversions, losses, or other reportable incidents that occur during transport, not more than 24 hours of such accidents, diversions, losses, or other reportable incidents.



## 253 Organic, LLC Management Operations and Policies

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### (c) Vehicles.

1. Our vehicle used for transporting marijuana products will be:
  - a. owned or leased by the 253 Organics;
  - b. properly registered, inspected, and insured in the Commonwealth (documentation of such status shall be maintained as records of 253 Organics, and shall be made available to the Commission upon request);
  - c. equipped with an alarm system approved by the Commission; and
  - d. equipped with functioning heating and air conditioning systems appropriate for maintaining correct temperatures for storage of marijuana products.

Marijuana products will not be visible from outside the vehicle.

Any vehicle used to transport marijuana products shall not bear any markings indicating that the vehicle is being used to transport marijuana products, and any such vehicle shall not indicate our name.

When transporting marijuana products, no other products may be transported or stored in the same vehicle.

No firearms may be located within the vehicle or on a 253 agent.

### (d) Storage Requirements.

Marijuana products will be transported in a secure, locked storage compartment that is a part of the vehicle transporting the marijuana products.

The storage compartment will be sufficiently secure that it cannot be easily removed.

If we are transporting marijuana products for more than one Marijuana Establishment at a time, the marijuana products for each Marijuana Establishment shall be kept in a separate locked storage compartment during transportation and separate manifests shall be maintained for each Marijuana Establishment.

If we are transporting marijuana products to multiple other establishments, it may seek the Commission's permission to adopt reasonable alternative safeguards.

### (e) Communications.

1. Any of our vehicles used to transport marijuana products shall contain a global positioning system (GPS) monitoring device that is:

- a. not a mobile device that is easily removable;
- b. attached to the vehicle at all times that the vehicle contains marijuana products;
- c. monitored by the Marijuana Establishment or Marijuana Transporter during transport of marijuana products; and
- d. inspected by the Commission prior to initial transportation of marijuana products, and after any alteration to the locked storage compartment.

2. Each 253 agent transporting marijuana products shall have access to a secure form of communication with personnel at the originating location at all times that the vehicle contains marijuana and marijuana products.

3. Secure types of communication include, but are not limited to:

- a. two-way digital or analog radio (UHF or VHF);
  - b. cellular phone; or
  - c. satellite phone.
4. When choosing a type of secure communications, the following shall be taken into consideration:
- a. cellular signal coverage;
  - b. transportation area;
  - c. base capabilities;
  - d. antenna coverage; and
  - e. frequency of transportation.
5. Prior to, and immediately after leaving the originating location, the marijuana establishment agents shall use the secure form of communication to contact the originating location to test communications and GPS operability.
6. If communications or the GPS system fail while on route, our agents transporting marijuana products must return to the originating location until the communication system or GPS system is operational.
7. Our agents transporting marijuana products shall contact the originating location when stopping at and leaving any scheduled location, and regularly throughout the trip, at least every 30 minutes.
8. The originating location must have a marijuana establishment agent assigned to monitoring the GPS unit and secure form of communication, who must log all official communications with marijuana establishment agents transporting marijuana products.

(f) Manifests.

A manifest shall be filled out in triplicate generated from METRC, with the original manifest remaining with the originating Marijuana Establishment, a second copy provide to the destination Marijuana Establishment upon arrival, and a copy to be kept with the licensed marijuana establishment agent during transportation and returned to the Marijuana Establishment or Marijuana Transporter upon completion of the transportation.

Prior to transport, the manifest shall be securely transmitted to the destination Marijuana Establishment by facsimile or email.

Upon arrival at the destination Marijuana Establishment, a marijuana establishment agent at the destination Marijuana Establishment shall compare the manifest produced by the agents who transported the marijuana products to the copy transmitted by facsimile or email. This manifest must, at a minimum, include;

- a. the originating Marijuana Establishment name, address, and registration number;
- b. the names and registration numbers of the agents who transported the marijuana products;
- c. the name and registration number of the marijuana establishment agent who prepared the manifest;
- d. the destination Marijuana Establishment name, address, and registration number;
- e. a description of the marijuana products being transported, including the weight and form or type of product;

## 253 Organic, LLC Management Operations and Policies

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- f. the mileage of the transporting vehicle at departure from originating Marijuana Establishment and mileage upon arrival at destination Marijuana Establishment, as well as mileage upon return to originating Marijuana Establishment;
- g. the date and time of departure from originating Marijuana Establishment and arrival at destination Marijuana Establishment for each transportation;
- i. a signature line for the marijuana establishment agent who receives the marijuana products;
- j. the weight and inventory before departure and upon receipt;
- k. the date and time that the transported products were re-weighed and re-inventoried;
- l. the name of the marijuana establishment agent at the destination Marijuana Establishment who re-weighed and re-inventoried products; and
- m. the vehicle make, model, and license plate number.

The manifest shall be maintained within the vehicle during the entire transportation process, until the delivery is completed.

We shall retain all transportation manifests for no less than one year and make them available to the Commission upon request.

(g) Requirements for Agents.

Our agent shall carry his or her registration card at all times when transporting marijuana products, and shall produce his or her registration card to the Commission or law enforcement officials upon request.

(h) Access to the Commission, Emergency Responders and Law Enforcement.

The following individuals shall have access to our Licensed facilities:

Representatives of the Commission in the course of responsibilities authorized by St. 2016, c.

334, as amended by St. 2017, c. 55 or 935 CMR 500.000; Representatives of other state agencies of the Commonwealth; and Emergency responders in the course of responding to an emergency.

(i) Trip Plans

*The Cultivation/MFG sites will ensure that company employees will be the only individuals permitted to transport cannabis, cannabis plants, between the Dispensary and the Dispensary's Cultivation site or another dispensary. In all such instances, the Cultivation will complete a trip plan, compliant with the requirements below.*

1. Contents

*If the cultivation and/or mfg transports cannabis, cannabis plants, as shown above, before transportation, the responsible agent will complete a trip plan that includes:*

- a. The name of the agents (two required) in charge of transporting the *cannabis*;
- b. The date and start time of the trip;
- c. A description of the *cannabis*, *cannabis* plants being transported; and

- d. The anticipated route of transportation
- e. Manifest created from METRC

***Procedure:*** The cultivation and/or kitchen/extraction will utilize the Trip Plan Form attached as Exhibit J that requests and requires entry of the data listed above. The Director of Operations designated dispensary agent will prepare a Trip Plan Form including each of the data items listed above. The Director of Operations or designated agent will retain one copy for filing with the cultivation and provide the second copy to the agent transporting any products.

## 2. Agent Responsibilities

*In addition to the responsibilities of an agent regarding the completion of the Trip Plan Form, the responsible agent will also enter the end time of the trip and any changes to the trip plan and provide a final copy of the trip plan to the Dispensary. The Dispensary will retain the final copy of the trip plan in electronic form at the Dispensary building. Any agent transporting cannabis will follow the procedures set forth below.*

***Procedure:*** The cultivation and/or kitchen will retain the electronic copy of the trip plan filed prior to transportation at the Cultivation building. During transportation, the agent will in addition:

- a. Carry a copy of the trip plan on the agent's person for the duration of the trip;
- b. Use a vehicle without any cannabis identification;
- c. Ensure that the dispensary agent has a means of communication with the Dispensary; and
- d. Ensure that the cannabis, cannabis plants, are not visible.
- e. Ensure that all traffic laws are followed.
- f. Ensure compliance with all other items on the Dispensaries internal transport checklist.
- g. Manifest created from METRC

## 3. Record Retention

*The Dispensary/Cultivation sites will maintain all trip plans described above at the Dispensary/Cultivation sites in compliance with the Document Retention Policy attached as Exhibit F for at least five years from the date of the filing of the trip plan and, upon request, provide a copy of any trip plans to the Department for review. The Dispensary/Cultivation sites will maintain all trip plans in electronic form at the Dispensary building. The Director of Operations will be responsible for ensuring that trip plans are accounted for and accurate. The trip plans will be stored within the companies electronic servers.*

### ***O) Additional Retail Procedures;***

#### ***(1) On-premises Verification of Identification for Adult Use Only Locations.***

Upon entry into the premises of a Marijuana Retailer by an individual, a marijuana establishment agent shall immediately inspect the individual's proof of identification and determine the individual's age. An individual shall not be admitted to the premises unless the retailer has verified that the individual is 21 years of age or older by an individual's proof of identification.

#### On-premises Verification of Identification.

Upon entry into our Retail location by an individual, a marijuana agent shall immediately inspect the individual's proof of identification and determine that the individual is 21 years of age or older. If the individual is younger than 21 years old but 18 years of age or older, he or she shall not be admitted.

Limitation on Sales. In accordance with M.G.L. c. 94G, § 7, we will not sell more than one ounce of marijuana or five grams of marijuana concentrate to a consumer per transaction.

#### Unauthorized Sales and Right to Refuse Sales.

We shall refuse to sell marijuana to any consumer who is unable to produce valid proof of identification.

We may refuse to sell marijuana products to a consumer if, in the opinion of our agent based on the information available to the agent at that time, the consumer or the public would be placed at risk.

We shall not sell to an individual more than one ounce of marijuana or five grams of marijuana concentrate per transaction.

We will not marijuana products containing nicotine.

We will not sell marijuana products containing alcohol, if sales of such alcohol would require licensure pursuant to M.G.L. c. 138.

#### Recording Sales.

We shall only utilize a point-of-sale (POS) system approved by the Commission, in consultation with the DOR. **We plan to use the BioTrack POS system which is**

**compatible with the METRC inventory system for daily uploads of inventory and sales.**

We will utilize a sales recording module approved by the DOR.

We will not be utilizing software or other methods to manipulate or alter sales data.

We shall conduct a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. We shall maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If we determine that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data:

we shall immediately disclose the information to the Commission;

we shall cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and

take such other action directed by the Commission to comply with 935 CMR 500.105.

We shall comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding record keeping requirements. Reference our record retention policy

We shall adopt separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales.

Consumer Education;

We shall make available educational materials about marijuana products to consumers. We will have an adequate supply of current educational material available for distribution. Educational materials will be available in commonly spoken languages designated by the Commission, which will include, but not be limited to appropriate materials for the visually- and hearing-impaired. Such materials will be made available for inspection by the Commission upon request.

The educational material must include at least the following:

A warning that marijuana has not been analyzed or approved by the FDA, that there is limited information on side effects, that there may be health risks associated with using marijuana, and that it should be kept away from children;

A warning that when under the influence of marijuana, driving is prohibited by M.G.L. c. 90, § 24, and machinery should not be operated;

Information to assist in the selection of marijuana, describing the potential differing effects of various strains of marijuana, as well as various forms and routes of administration;

Materials offered to consumers to enable them to track the strains used and their associated effects;

Information describing proper dosage and titration for different routes of administration. Emphasis shall be on using the smallest amount possible to achieve the desired effect. The impact of potency must also be explained;

A discussion of tolerance, dependence, and withdrawal;

Facts regarding substance abuse signs and symptoms, as well as referral information for substance abuse treatment programs;

A statement that consumers may not sell marijuana to any other individual;

Information regarding penalties for possession or distribution of marijuana in violation

(j) Any other information required by the Commission.

### **P) Additional Product Manufacturing Procedure;**

Our Product Manufacturing site will satisfy minimum energy efficiency and equipment standards established by the Commission and meet all applicable environmental laws, regulations, permits and other applicable approvals, including those related to water quality and solid waste disposal, and to use additional best management practices as determined by the Commission in consultation with the working group established under St. 2017, c. 55, § 78(b) to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts. If minimum standards or best management practices are not established by the time of an application for initial licensure, We shall satisfy such standards or best management practices as a condition of license renewal, in addition to any the terms and conditions of any environmental permit regulating the licensed activity.

The extraction process is a closed loop CO2 system which is a non flammable process. This system has been approved in multiple states.

### **Q) Additional Information on Cultivation;**

253 Organics plans to cultivate the following genetics to be sold as flower, concentrates and edibles. Cookies and Cream, Purple Chem , Chem D, Kryptonite, Citradelic sunset, Kristna Kush, Hercules, Banana Pie, Green crack, Zweet Insanity. A combination of Hybrids, Sativa, Indica and CBD genetics. The plants will be grown in a coco medium using dry salts for nutrients under 630W ceramic metal halide bulbs. We will grow “mothers” and take clones from those mothers to propagate the grow cycle.

### **R) Banking/Cash**

253 Organics will use an approved licensed security company to transport cash from our location to our bank two times a week. All cash from daily sales will be audited against our POS/METRC systems daily and stored in the companies on site safe.

Applicant: 253 Organic, LLC  
EIN: 82-4664662

## **Management and Operations – Detailed Summary of Operating Policies and Procedures for Cultivation**

Unless otherwise indicated, all section references are to the *253 Organic, LLC Management Operations and Policies (v. R3s)*

- Security - Section M
- Prevention of Diversion - Sections F, G, K, L, M, and O
- Storage of Marijuana – Section G
- Transportation of Marijuana, if applicable to license type – Section N
- Inventory Procedures – Section E
- Procedures for Quality Control and Testing of Product for Potential Contaminants – Section J
- Personnel Policies - See *253 Organic, LLC Employee Handbook, revised June 1, 2019*
- Dispensing procedures – Sections F, G, O
- Record-keeping Procedures – Section D and *Document Retention Policy (August 2018)*
- Maintenance of Financial Records – Section D; Exhibit A of *Document Retention Policy (August 2018)*
- Diversity Plan - See *Diversity Plan – Final 1-25-19*



## **Management and Operations – Personnel Policies**

### For compliance with 935 CMR 500.101(1)(c)(7)\*

\*Unless otherwise indicated, all section references are to the *253 Organic, LLC Management Operations and Policies (v. R3s)*

- Security - Section M
- Prevention of Diversion - Sections F, G, K, L, M, and O
- Storage of marijuana – Section G
- Transportation of Marijuana, if applicable to license type – Section N
- Inventory Procedures – Section E
- Procedures for Quality Control and Testing of Product for Potential Contaminants – Section J
- Personnel policies - See *253 Organic, LLC Employee Handbook, revised June 1, 2019*
- Dispensing procedures – Sections F, G, O
- Record-keeping Procedures – Section D and *Document Retention Policy (August 2018)*
- Maintenance of Financial Records – Section D; Exhibit A of *Document Retention Policy (August 2018)*
- Diversity Plan - See *Diversity Plan – final 1-25-19*

### For compliance with 935 CMR 500.105(1)

\*Unless otherwise indicated, all section references are to the *253 Organic, LLC Management Operations and Policies (August 2018)*

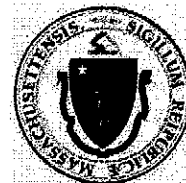
- Security - Section M
- Prevention of Diversion - Sections F, G, K, L, M, and O
- Hours of Operation and After Hours Contact Information – Sections A and I
- Storage of marijuana – Section G
- Strains of Marijuana – Section Q
- Record-keeping Procedures – Section D and *Document Retention Policy (August 2018)*
- Procedures for Quality Control and Testing of Product for Potential Contaminants – Section J
- Staffing Plan and Records - See *253 Organic, LLC Employee Handbook, revised June 1, 2019*
- Emergency Procedures – Sections I, N
- Alcohol, Smoke and Drug-Free Workplace – See *253 Organic, LLC Employee Handbook, revised June 1, 2019*
- Confidential Information – Pages 2, 3 and 9 of *Document Retention Policy (August 2018)*
- Immediate Dismissal – See *253 Organic, LLC Employee Handbook, revised June 1, 2019*

### For compliance with 935 CMR 500.105(9)

See *Document Retention Policy (August 2018)*



THE COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF PUBLIC SAFETY AND SECURITY  
Department of Criminal Justice Information Services 200  
Arlington Street, Suite 2200, Chelsea, MA 02150  
TEL: 617-660-4640 | TTY: 617-660-4606 | FAX: 617-660-5973  
MASS.GOV/CJIS



**This form is not to be faxed. Please return form to organization.**

**Criminal Offender Record Information (CORI)  
Acknowledgement Form**

To be used by organizations using consumer reporting agencies to conduct CORI checks for employment, volunteer, subcontractor, licensing, and housing purposes.

253 Organic, LLC

is registered under the

(Organization)

provisions of M.G.L. c.6, § 172 to receive CORI for the purpose of screening current and otherwise qualified prospective employees, subcontractors, volunteers, license applicants, current licensees, and applicants for the rental or lease of housing.

253 Organic, LLC

has authorized

(Organization)

Creative Services, Inc.

to submit CORI checks

(Consumer Reporting Agency)

to the Massachusetts Department of Criminal Justice Information Services (DCJIS) on its behalf.

As a prospective or current employee, subcontractor, volunteer, license applicant, current licensee, or applicant for the rental or lease of housing, I understand that a CORI check will be submitted for my personal information to the DCJIS. I hereby acknowledge and provide permission to Creative Services, Inc.

(Consumer Reporting Agency)

to submit a CORI check for my information to the DCJIS. This authorization is valid for one year from the date of my signature. I may withdraw this authorization at any time by providing

253 Organic, LLC

(Organization)

with written notice of my intent to withdraw consent to a CORI check. I also understand that this form is a CORI acknowledgement form and I am entitled to additional consumer reporting disclosure forms under the Fair Credit Reporting Act. If I have not received those disclosures, I should contact

253 Organic, LLC

(Organization)

to request this information.

FOR EMPLOYMENT, VOLUNTEER, AND LICENSING PURPOSES ONLY:

I also understand that the

Creative Services, Inc.

, on behalf of

(Consumer Reporting Agency)

253 Organic, LLC

may conduct

(Organization)

subsequent CORI checks within one year of the date this Form was signed by me.

By signing below, I provide my consent to a CORI check and affirm that the information provided on Page 2 of this Acknowledgement Form is true and accurate.

\_\_\_\_\_  
Signature of CORI Subject

\_\_\_\_\_  
Date



**THE COMMONWEALTH OF MASSACHUSETTS**  
**EXECUTIVE OFFICE OF PUBLIC SAFETY AND SECURITY**  
**Department of Criminal Justice Information Services**  
200 Arlington Street, Suite 2200, Chelsea, MA 02150  
TEL: 617-880-4640 | TTY: 617-880-4606 | FAX: 617-880-5973  
MASS.GOV/CJIS



**SUBJECT INFORMATION**

Please complete this section using the information of the person whose CORI you are requesting.  
The fields marked with an asterisk (\*) are required fields.

\* First Name: \_\_\_\_\_ Middle Initial: \_\_\_\_\_  
\* Last Name: \_\_\_\_\_ Suffix (Jr., Sr., etc.): \_\_\_\_\_  
Former Last Name 1: \_\_\_\_\_  
Former Last Name 2: \_\_\_\_\_  
Former Last Name 3: \_\_\_\_\_  
Former Last Name 4: \_\_\_\_\_  
\* Date of Birth (MM/DD/YYYY): \_\_\_\_\_ Place of Birth: \_\_\_\_\_  
\* Last SIX digits of Social Security Number: \_\_\_\_\_ ☐ No Social Security Number  
Sex: \_\_\_\_\_ Height: \_\_\_\_\_ ft. \_\_\_\_\_ in. Eye Color: \_\_\_\_\_ Race: \_\_\_\_\_  
Driver's License or ID Number: \_\_\_\_\_ State of Issue: \_\_\_\_\_  
Father's Full Name: \_\_\_\_\_  
Mother's Full Name: \_\_\_\_\_

**Current Address**

\* Street Address: \_\_\_\_\_  
Apt. # or Suite: \_\_\_\_\_ \*City: \_\_\_\_\_ \*State: \_\_\_\_\_ \*Zip: \_\_\_\_\_

**SUBJECT VERIFICATION**

The above information was verified by reviewing the following form(s) of government-issued identification:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Verified by:

\_\_\_\_\_  
*Print Name of Verifying Employee*

\_\_\_\_\_  
*Signature of Verifying Employee*

\_\_\_\_\_  
*Date*

☐ EMPLOYER: Check the box if the annual salary of the position for which this subject is being screened is \$75,000.00 or more.  
IMPORTANT NOTE: If unchecked, salary is under \$75,000.00.

DISCLOSURE REGARDING BACKGROUND INVESTIGATION

\_\_\_\_\_ ("the Company") may obtain information about you from a consumer reporting agency for employment and/or licensure purposes. Thus, you may be the subject of a "consumer report," which may include information about your character, general reputation, personal characteristics, and/or mode of living. These reports may contain information regarding your credit history, criminal history, social security verification, motor vehicle records ("driving records"), verification of your education or employment history, or other background checks.

You have the right, upon written request made within a reasonable time, to request whether a consumer report has been run about you and to request a copy of your report. These searches will be conducted by Creative Services, Inc., 64 Pratt Street, Mansfield, MA 02048, (800) 536-0093 / (508) 339-5451, <http://www.creativeservices.com/resource-center/privacy-policy>.

Applicant (print name): \_\_\_\_\_

Applicant (signature): \_\_\_\_\_ Date: \_\_\_\_\_

**[End of Document]**  
**p. 1 of 1**

## **DISCLOSURE REGARDING "INVESTIGATIVE CONSUMER REPORT"**

### **BACKGROUND INVESTIGATION**

\_\_\_\_\_ (the "Company"), to which you have applied for employment and/or licensure, may request an investigative consumer report about you from a third party consumer reporting agency, in connection with your employment, application for employment (including independent contractor or volunteer assignments, as applicable), or licensure. An "investigative consumer report" is a background report that includes information from personal interviews (except in California, where that term includes background reports with or without information obtained from personal interviews). The most common form of an investigative consumer report in connection with your employment and/or licensure is a reference check through personal interviews with sources such as your former employers and associates, and other information sources. The investigative consumer report may contain information concerning your character, general reputation, personal characteristics or mode of living. You may request more information about the nature and scope of an investigative consumer report, if any, by contacting the Company.

You have the right, upon written request made within a reasonable time, to request (1) whether an investigative consumer report has been obtained about you, (2) disclosure of the nature and scope of any investigative consumer report and (3) a copy of your report. These reports will be conducted by Creative Services, Inc., 64 Pratt Street, Mansfield, MA 02048, (800) 536-0093 / (508) 339-5451, <http://www.creativeservices.com/resource-center/privacy-policy>.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**[End of Document]**  
**p. 1 of 1**

## Acknowledgement & Authorization for Background Investigation

I hereby authorize the obtaining of "consumer reports" and "investigative consumer reports" by \_\_\_\_\_ ("Company") at any point after receipt of this authorization and, if hired and/or licensed, throughout my employment and/or licensure with the Cannabis Control Commission, if applicable. Therefore, I hereby authorize courts, probation departments, selective service boards, employers, educational institutions, banks, credit bureaus, financial and other institutions, law enforcement and local, state (including the Minnesota Bureau of Criminal Apprehension), and federal government agencies, both foreign and domestic, to furnish any and all background information (including, but not limited to, driving and/or motor vehicle records) requested by Creative Services, Inc., 64 Pratt Street, Mansfield, MA 02048-1927, (800) 536-0093. I agree that a copy be released to the Cannabis Control Commission as required by law. I agree that a photocopy of this authorization shall be accepted with the same authority as the original. CSI's Privacy Policy can be found at <http://www.creativeservices.com/resource-center/privacy-policy> or obtained by request to the above address.

**California, Minnesota and Oklahoma applicants or employees only:** Please check this box if you would like a free copy of the consumer report if one is prepared on you? ☐

Applicant (print name): \_\_\_\_\_

Applicant (signature): \_\_\_\_\_ Date: \_\_\_\_\_

If currently employed, may we contact your current employer?

☐ YES ☐ NO ☐ N/A

(Last Name)

(First Name)

(Middle Name)

(Other Names) List all other NAMES (including maiden or married names) utilized during the previous 7 years and/or used when obtaining any degrees or certifications.

Current Address:

City & State:

Zip Code:

Social Security Number:\*

Date of Birth: \*  
MM/DD/YYYY

Driver's License Number:\*

State of Issue:

Cell Phone: ( ) -

Home Phone: : ( ) -

Email address:

Please list all addresses where you have resided for the past seven years:

(#/Street)

(City)

(State)

(Zip Code)

(#/Street)

(City)

(State)

(Zip Code)

(#/Street)

(City)

(State)

(Zip Code)

(#/Street)

(City)

(State)

(Zip Code)

Signature:

Date:

\* Social security numbers, dates of birth, and drivers' license numbers are requested to ensure accurate retrieval of records. They will not be considered by the employer in making employment decisions. This form will be filed separately from your employment application.

## Appendix B – FCRA Summary of Rights

*Para informacion en espanol, visite [www.consumerfinance.gov/learnmore](http://www.consumerfinance.gov/learnmore) o escribe a la Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.*

### A Summary of Your Rights Under the Fair Credit Reporting Act

The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Here is a summary of your major rights under the FCRA. **For more information, including information about additional rights, go to [www.consumerfinance.gov/learnmore](http://www.consumerfinance.gov/learnmore) or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.**

- **You must be told if information in your file has been used against you.** Anyone who uses a credit report or another type of consumer report to deny your application for credit, insurance, or employment – or to take another adverse action against you – must tell you, and must give you the name, address, and phone number of the agency that provided the information.
- **You have the right to know what is in your file.** You may request and obtain all the information about you in the files of a consumer reporting agency (your “file disclosure”). You will be required to provide proper identification, which may include your Social Security number. In many cases, the disclosure will be free. You are entitled to a free file disclosure if:
  - a person has taken adverse action against you because of information in your credit report;
  - you are the victim of identity theft and place a fraud alert in your file;
  - your file contains inaccurate information as a result of fraud;
  - you are on public assistance;
  - you are unemployed but expect to apply for employment within 60 days.

In addition, all consumers are entitled to one free disclosure every 12 months upon request from each nationwide credit bureau and from nationwide specialty consumer reporting agencies. See [www.consumerfinance.gov/learnmore](http://www.consumerfinance.gov/learnmore) for additional information.

- **You have the right to ask for a credit score.** Credit scores are numerical summaries of your credit-worthiness based on information from credit bureaus. You may request a credit score from consumer reporting agencies that create scores or distribute scores used in residential real property loans, but you will have to pay for it. In some mortgage transactions, you will receive credit score information for free from the mortgage lender.
- **You have the right to dispute incomplete or inaccurate information.** If you identify information in your file that is incomplete or inaccurate, and report it to the consumer reporting agency, the agency must investigate unless your dispute is frivolous. See [www.consumerfinance.gov/learnmore](http://www.consumerfinance.gov/learnmore) for an explanation of dispute procedures.
- **Consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information.** Inaccurate, incomplete or unverifiable information must be removed or corrected, usually within 30 days. However, a consumer reporting agency may continue to report information it has verified as accurate.



- **Consumer reporting agencies may not report outdated negative information.** In most cases, a consumer reporting agency may not report negative information that is more than seven years old, or bankruptcies that are more than 10 years old.
- **Access to your file is limited.** A consumer reporting agency may provide information about you only to people with a valid need – usually to consider an application with a creditor, insurer, employer, landlord, or other business. The FCRA specifies those with a valid need for access.
- **You must give your consent for reports to be provided to employers.** A consumer reporting agency may not give out information about you to your employer, or a potential employer, without your written consent given to the employer. Written consent generally is not required in the trucking industry. For more information, go to [www.consumerfinance.gov/learnmore](http://www.consumerfinance.gov/learnmore).
- **You may limit “prescreened” offers of credit and insurance you get based on information in your credit report.** Unsolicited “prescreened” offers for credit and insurance must include a toll-free phone number you can call if you choose to remove your name and address from the lists these offers are based on. You may opt-out with the nationwide credit bureaus at 1-888-567-8688.
- **You may seek damages from violators.** If a consumer reporting agency, or, in some cases, a user of consumer reports or a furnisher of information to a consumer reporting agency violates the FCRA, you may be able to sue in state or federal court.
- **Identity theft victims and active duty military personnel have additional rights.** For more information, visit [www.consumerfinance.gov/learnmore](http://www.consumerfinance.gov/learnmore).

**States may enforce the FCRA, and many states have their own consumer reporting laws. In some cases, you may have more rights under state law. For more information, contact your state or local consumer protection agency or your state Attorney General. For information about your federal rights, contact:**

TYPE OF BUSINESS:	CONTACT:
<p>1.a. Banks, savings associations, and credit unions with total assets of over \$10 billion and their affiliates.</p> <p>b. Such affiliates that are not banks, savings associations, or credit unions also should list, in addition to the CFPB:</p>	<p>a. Consumer Financial Protection Bureau 1700 G Street NW Washington, DC 20552</p> <p>b. Federal Trade Commission: Consumer Response Center – FCRA Washington, DC 20580 (877) 382-4357</p>
<p>2. To the extent not included in item 1 above:</p> <p>a. National banks, federal savings associations, and federal branches and federal agencies of foreign banks</p>	<p>a. Office of the Comptroller of the Currency Customer Assistance Group 1301 McKinney Street, Suite 3450 Houston, TX 77010-9050</p>

<p>b. State member banks, branches and agencies of foreign banks (other than federal branches, federal agencies, and Insured State Branches of Foreign Banks), commercial lending companies owned or controlled by foreign banks, and organizations operating under section 25 or 25A of the Federal Reserve Act</p> <p>c. Nonmember Insured Banks, Insured State Branches of Foreign Banks, and insured state savings associations</p> <p>d. Federal Credit Unions</p>	<p>b. Federal Reserve Consumer Help Center P.O. Box 1200 Minneapolis, MN 55480</p> <p>c. FDIC Consumer Response Center 1100 Walnut Street, Box #11 Kansas City, MO 64106</p> <p>d. National Credit Union Administration Office of Consumer Protection (OCP) Division of Consumer Compliance and Outreach (DCCO) 1775 Duke Street Alexandria, VA 22314</p>
3. Air carriers	<p>Asst. General Counsel for Aviation Enforcement &amp; Proceedings Aviation Consumer Protection Division Department of Transportation 1200 New Jersey Avenue, S.E. Washington, DC 20590</p>
4. Creditors Subject to the Surface Transportation Board	<p>Office of Proceedings, Surface Transportation Board Department of Transportation 395 E Street, S.W. Washington, DC 20423</p>
5. Creditors Subject to Packers and Stockyards Act	<p>Nearest Packers and Stockyards Administration area supervisor</p>
6. Small Business Investment Companies	<p>Associate Deputy Administrator for Capital Access United States Small Business Administration 409 Third Street, SW, 8<sup>th</sup> Floor Washington, DC 20416</p>
7. Brokers and Dealers	<p>Securities and Exchange Commission 100 F Street, N.E. Washington, DC 20549</p>
8. Federal Land Banks, Federal Land Bank Associations, Federal Intermediate Credit Banks, and Production Credit Associations	<p>Farm Credit Administration 1501 Farm Credit Drive McLean, VA 22102-5090</p>
9. Retailers, Finance Companies, and All Other Creditors Not Listed Above	<p>FTC Regional Office for region in which the creditor operates or Federal Trade Commission: Consumer Response Center – FCRA Washington, DC 20580 (877) 382-4357</p>

## STATE NOTICES

**NEW YORK Applicants or employees only:** You have the right to inspect and receive a copy of any investigative consumer report requested by the **Company** by contacting Creative Services, Inc. at Creative Services, Inc. 64 Pratt Street, Mansfield MA 02048, Phone: 508-339-5451.

**NEW YORK Applicants or employees:** You acknowledge receipt of Article 23-A of the New York Correction Law.

**WASHINGTON Applicants or employees:** You have the right to request from Creative Services, Inc. a written summary of your rights and remedies under the Washington Fair Credit Reporting Act. For your convenience, you may also find a copy here.

**NEW JERSEY Applicants or employees:** You have the right to request from Creative Services, Inc. a written summary of your rights and remedies under the New Jersey Fair Credit Reporting Act. For your convenience, you may also find a copy here.


**CALIFORNIA Applicants or employees:** You acknowledge receipt of the NOTICE REGARDING BACKGROUND INVESTIGATION PURSUANT TO CALIFORNIA LAW. Under California law you are entitled to visually inspect all files maintained about you by an investigative consumer reporting agency, ("ICRA"), such as Creative Services, Inc., upon request. Please read the attached document for more information about your rights.

**CALIFORNIA Applicants or employees:** You acknowledge receipt of the NOTICE REGARDING BACKGROUND INVESTIGATION and USE OF CREDIT INFORMATION PURSUANT TO CALIFORNIA LAW

**OREGON Applicants or employees:** Information describing your rights under federal and Oregon law regarding consumer identity theft protection, the storage and disposal of your credit information, and remedies available should you suspect or find that the Company has not maintained secured records is available to you upon request.

**MASSACHUSETTS Consumers:** You have the right to receive a copy of your investigative consumer report requested by the Company, upon its completion, by contacting Creative Services, Inc. at Creative Services, Inc. 64 Pratt Street, Mansfield MA 02048, Phone: 508-339-5451.

**VERMONT Applicants or employees:** 9 V.S.A. §§ 2480e and 2480g requires a clear and adequate written disclosure of the circumstances under which a credit report or credit reports may be obtained and the purposes for which the credit report or credit reports may be obtained. You also acknowledge receipt of the Vermont Fair Credit Report Act Notice.

	Facility:	253 Organic LLC
	Prepared By:	Hannah Ward, Compliance Manager
	Issue Date:	7.31.20
	Version:	2.0 Draft/Notes

### 253 Organic, LLC Diversity Plan 2.0 (August 2020)

This Diversity Plan (“Plan”) by 253 Organic, LLC (“253”) is a supplement to the 253 Organic, LLC Management Operations and Policies and the 253 Organic, LLC Employee Handbook, revised August 1, 2020. It is designed to comply with 935 CMR 500.101(e), which requires every applicant to have a diversity plan to promote equity among minorities, women, veterans, people with disabilities, people of all gender identities and sexual orientation; note, however, that 253 desires to go above and beyond what is required by statute to also reach out to immigrants, persons who speak English as a second language, single parents, and caregivers (“Diverse Community”).

When we began, 253 estimated that we would have the following hiring needs.

- 15-18 employees in its Cultivation Facility
- 8-10 employees in its Retail Facility
- 3-5 employees in its Manufacturing Facility

### Goals

In general, the goal of this plan is to promote diversity at all levels of 253, including in entry level, hiring, promotion, and managerial. As a long-term goal, 253 will be recognized as a leader for providing job opportunities, job growth, training and managerial opportunities to the Diverse Community in a caring, nurturing holistic environment where the employee is valued and his or her insight is sought to improve 253, its product, work environment and community. Change has been our only constant these last 9 months of Retail, 8 months of Cultivation and Manufacturing, and 2 months of Wholesale between the Vape Ban and shutdown for COVID 19.. This updated diversity plan is meant to provide an adaptable, actionable framework to implement these goals for 2020 and into the future.

As short-term goals:

- By three years from the date that all three of 253’s facilities are open for business, 253’s workforce will comprised of 50% female and minority employees.

\*Note that 253 has already reached out to the El Salvadorian community in Hampshire County, as of the writing of this - 3 individuals are employed at 253 from this community. Four additional employees were

interviewed, hired, and badged then chose to work elsewhere.

## **Programs**

In an effort to reach qualified community members for employment opportunities, 253 will conduct the following programs.

1. Conduct career fairs for members of the Diverse Community.
2. Schedule and conduct formal interviews with individuals from the Diverse Community.

In an effort to learn about our diverse employees, find out what resources they need, retain them within the company, as well as lay the groundwork for sustained support, 253 will implement the following programs. These programs will be conducted at least twice per year, and certain programs will be conducted quarterly.

1. Offer job skill assessments and provide guidance for interested employees to receive leadership and/or managerial training relevant to leadership positions.
2. Conduct internal training sessions regarding embracing diversity, and promoting an open dialogue regarding inclusion, training events designed to bring awareness about diversity.

## **Measurement and Accountability**

253 will use both qualitative and quantitative measures to track progress and determine whether the above-stated goals are achieved.

- Number of people from the Diverse Community attending job fairs held by 253.
- Number of people from the Diverse Community with whom 253 conducted formal interviews.
- Number of employees from the Diverse Community to whom 253 offered job skill assessments and guidance to receive leadership and/or managerial training relevant to positions.
- 253 will perform staff surveys about the implementation of its Programs, analyze results, identify areas for improvement, and take corrective steps. *Coming August / September 2020 based on employee surveys*
- Track diversity within 253 through internal demographic data. *Currently tracked through basic voluntary surveys at hiring. This survey will be expanded in Fall 2020/Early 2021.*
- Periodic audits for pay equity. *To be Implemented in late 2020/ early 2021*

In the coming year we will be identifying qualitative and quantitative measures not previously listed based on the employee surveys we are developing currently.

## **Efforts, Progress and Success of Diversity Plan**

Efforts

We held 2 Career Fairs last year. 5/4/19 in Greenfield at Hawks & Reed and 7/20/19 VFW in Amherst. More were planned in 2020, but were not executed because of COVID-19. As they were our initial job fairs, demographic data was not collected. Cumulatively 217 applications were collected in total.

We had 75 Interviews last year. With the first round of hiring, 59% of employees hired were a direct result of the job fairs. 67% of those hires were not white male. 54% of those hires were Female and 21% were Non-Caucasian

12 of 51 employees who were non-male, non-white (24%) have been promoted or voluntarily changed departments and received a pay increase based on performance. As much as possible, we are training and promoting in an effort to keep employees. Instead of lay-offs, when we resumed business after the state of emergency due to the COVID-19 Pandemic; Cultivation, Production, and Retail employees were moved around within Licenses to ensure 100% continued employment.

As of the date of writing of this update, Our Compliance Manager and Head of Human Resources have taken MA State Approved Diversity Awareness Training and are working to develop Diversity Awareness Training and Education programs for our management team and all employees. As we have only been operating actively since last fall, and were delayed by COVID19, some of our training programs have not had a chance to engage as quickly we had hoped. We are in the process of creating employee surveys to learn what specifically our employees needs are.

In an effort to make accessibility a priority, our focus has been to transfer all of our training information and standard operating procedures to a platform that supports virtually any language, to make the information accessible to everyone as we have several employees for whom English is a second language. We are working to make copies of all relevant documents available in Spanish in addition to English, to support our Employees whose primary language is Spanish.

One of our goals is to ensure everyone has access to the tools they need to advance if they wish to do so. Identifying these tools is an ongoing process. This will be done in the coming months through voluntary surveys, as well as company wide projects and volunteer opportunities as come into focus. We are working closely with local leaders to identify those specific opportunities as we have only just entered Phase III of the reopening Massachusetts at the writing of this plan.

#### Progress

<u>Total Jobs</u> (As of this writing of the plan) 22 employees in its Cultivation Facility 16 employees in its Retail Facility 3 employees in its Manufacturing Facility	<u>Our Company's Current Demographic Breakdown:</u> (Based on Voluntary Survey after hiring) Based on questions asked on CCC Agent
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51 Total Employees including Administrative and Management Positions	Registration Application 62% Non-White Male 53 % Female 23 % Hired from job fairs 19 % non-caucasian
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## Success

During our first year being open for business, we have surpassed our hiring goals in regards to the total number of jobs created. With that said, when positions become available, 253 Organic is committed to promoting first within the company with an emphasis on members of the Diverse Community.

We have met our 3-year plan in our first year of being open for business in regards to target percentages of employees who are members of the Diverse Community. However, this does not mean our job is done. We plan to expand on our employee survey and use that information to learn about 253's Diverse Employees and what tools they need to be successful and advance so that we can create a sustainable framework to retain and attract a diverse employee population.

Employee 1	Male	Female	Caucasian	Non-Caucasian	Town of Residence		Job Fair
CEO / Owner	x		x		Hadley, MA	Seth	
CEO / Owner	x		x		Northampton, MA	Chris	
Owner		x	x		Belmont, MA	Marcia	
Owner	x		x		Belmont, MA	Alan	
CFO		x	x		Hadley, MA	Bambi	
COO	x		x		Sunderland, MA	John	
Manager		x	x		Sunderland, MA	Danie	
Manager		x	x		Amherst, MA	Ariel	
Manager	x		x		Northampton, MA	Zakk	
Manager	x		x		Easthampton, MA	Steve	
Manager		x		x	Greenfield, MA	Jourdan	
Manager		x	x		Amherst, MA	Brianyn	G
Manager	x			x	Shelburne, MA	Johnny	
Manager		x	x		Northampton, MA	Hannah	
50% Female		14% Non Caucasian					
RETAIL							
Asst Mgr Retail	x		x		Hadley, MA	Chase	A
Asst Mgr Retail	x			x	Shutesbury, MA	Yusef	
Asst Mgr Retail		x	x		Bernardston, MA	Ananda	
Budtender		x		x	Montague, MA	Kaineeca	G
Budtender	x		x		Northfield, MA	Lucas	G
Budtender		x	x		Northfield, MA	Michelle	G
Budtender		x	x		Montague, MA	Farrah	G
Budtender		x	x		Montague, MA	Casey	A
Budtender		x	x		Montague, MA	Heather	G
Budtender		x	x		Greenfield, MA	Laura	
Budtender		x	x		Northfield, MA	Samantha	
Budtender		x	x		Montague, MA	Deb	
Budtender	x		x		Orange, MA	Tom	
Budtender	x			x	Orange, MA	Kevin	
Budtender	x		x		Amherst, MA	Nick	
Cultivation Lead	x		x		Hadley, MA	Chris	
Cultivator		x	x		Montague, MA	Katie	A
Cultivator	x			x	Chicopee, MA	Oscar	
Cultivator	x			x	Amherst, MA	Serafin	
Cultivator	x		x		Easthampton, MA	Brian	
Trim Lead		x	x		Northampton, MA	Ashley	
Trimmer	x		x		Gardner, MA	Jeremy	G
Trimmer	x		x		Marlbrough, NH	Jimmy	
Trimmer		x		x	Amherst, MA	Carmela	
Trimmer		x	x		Montague, MA	Brianna	
Trimmer	x		x		Northampton, MA	Eric	
Trimmer	x			x	Belchertown, MA	Franklin	
Asst Mgr Packaging	x		x		Conway, MA	Jason	G
Packaging Lead	x		x		Ashfield, MA	Jon	
Packaging		x	x		Northampton, MA	Jen	
Packaging		x	x		Montague, MA	Elizabeth	
Packaging		x	x		Montague, MA	Crystal	
Packaging		x	x		West Hatfield, MA	Rebecca	
Packaging		x	x		Athol, MA	Rachel	G



Kitchen	x	x	Wendell, MA	Kelly	
Lab	x	x	Florence, MA	Tyler	
Maintenance	x	x	Montague, MA	Mark	G
Janitorial	x	x	Heath, MA	Jacob	
Admin	x	x	Florence, MA	Linda	G

64% not white male	51% Femaile	18% Non-Caucasian	Orange towns directly adjacent to Amherst, Holyoke Springfield, or Greenfield
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	Applicants	Greenfield Residents	Amherst Residents
Amherst Job Fair	28	2	5
Greenfield Job Fair	171	35	7
On Line Submissions	17	5	0
Indeed Submissions			



## Personal Protective Equipment (PPE): Employee Training Certification

Person Performing Training Session (name/title):

John Snyder, Dir. of Operations

Date: 03/03/2020

Employee Full Name:

Kelly Erin Surprenant

Employee Signature:

Kelly Surprenant

Items Covered During Training:

- ☒ When PPE is necessary
- ☒ What PPE is necessary
- ☒ How to properly put on, take off, adjust, and wear PPE
- ☒ Limitations and useful life of the PPE
- ☒ Proper care, maintenance, replacement, and disposal of PPE

Trainer Signature:

John Snyder





## Hazard Communication Plan: Employee Training Certification

Person Performing Training Session (name/title):

John Snyder, Dir. of Operations

Date: 03/03/2020

Employee Full Name:

Kelly Erin Surprenant

Employee Signature:

Kelly Surprenant

Items Covered During Training:

- ☒ An overview of the requirements in OSHA's Hazard Communication Standard.
- ☒ Hazardous chemicals present in their workplace.
- ☒ Any operations in their work area where hazardous chemicals are used.
- ☒ The location of the written hazard communication plan and where it may be reviewed.
- ☒ How to understand and use the information on labels and in Safety Data Sheets.
- ☒ Physical and health hazards of the chemicals in their work areas.
- ☒ Methods used to detect the presence or release of hazardous chemicals in the work area.
- ☒ Steps we have taken to prevent or reduce exposure to these chemicals.
- ☒ How employees can protect themselves from exposure to these hazardous chemicals through the use of engineering controls/work practices and personal protective equipment.
- ☒ An explanation of any special labeling present in the workplace.
  - What are pictograms?
  - What are the signal words?
  - What are the hazard statements?
  - What are the precautionary statements?
- ☒ Emergency procedures to follow if an employee is exposed to these chemicals.

Trainer Signature:

John Snyder





## Fire Protection Plan: Employee Training Certification

Person Performing Training Session (name/title):

John Snyder, Dir. of Operations

Date: 03/03/2020

Employee Full Name:

Kelly Erin Surprenant

Employee Signature:

Kelly Surprenant

Items Covered During Training:

☒ **Fire Prevention Plan**

☒ **What to do if employee discovers a fire**

- How to Raise the Alarm
- How to Recognize Fire Exits
- Evacuation Routes
- Assisting Persons with Disabilities
- Measures to contain fire (closing doors, etc.)
- Immediate Evacuation
- Assembly Areas
- Return to Building After "All Clear" Signal

☒ **Fire Drills**

Trainer Signature:

[Signature]





## Emergency Action Plan: Employee Training Certification

Person Performing Training Session (name/title):

John Snyder, Dir. of Operations

Date: 03/03/2020

Employee Full Name:

Kelly Erin Suprenant

Employee Signature:

Kelly Snyder

Items Covered During Training:

- ☒ Possible Incidents Requiring Evacuation
- ☒ Assembly Areas
- ☒ Ensuring a safe and orderly evacuation

Trainer Signature:

[Signature]



## Food Employee Reporting Agreement

### Preventing Transmission of Diseases through Food by Infected Food Employees

The purpose of this agreement is to ensure that Food Employees and Conditional Employees notify the Person in Charge when they experience any of the conditions listed so that the Person in charge can take appropriate steps to preclude the transmission of foodborne illness.

#### I AGREE TO REPORT TO THE PERSON IN CHARGE:

##### A. SYMPTOMS OF:

diarrhea, vomiting, jaundice, sore throat with fever, and lesions containing pus on the hand, wrist, or an exposed body part (such as boils and infected wounds, however small.)

##### B. MEDICAL DIAGNOSIS OF BEING ILL WITH:

norovirus, shiga toxin-producing *E. coli*, *S. typhi* (typhoid fever), *Shigella* spp., non-typhoidal *Salmonella*, and Hepatitis A, as well as other diseases that may be transmitted through food per 105 CMR 300.000. Contact the Food Protection Program at 617-983-6712 or The Epidemiology Program at 617-983-6800 for additional information.

##### C. PAST MEDICAL DIAGNOSIS OF DISEASES LISTED ABOVE:

Have you ever been diagnosed as being ill with one of the diseases listed above? \_\_\_\_\_  
If you have, what was the date of the diagnosis? \_\_\_\_\_

##### D. HIGH-RISK CONDITIONS:

- Exposure to or suspicion of causing any confirmed outbreak of the diseases listed under Part B above.
- A household member has been diagnosed with diseases listed in Part B above.
- A household member attending or working in a setting experiencing a confirmed outbreak of one of the diseases listed in part B above.

I have read (or had explained to me) and understand the requirements concerning my responsibilities under 105 CMR 590/2013 Food Code and this agreement to comply with the reporting requirements specified above involving symptoms, diagnoses, and high-risk conditions specified. I also understand that should I experience one of the above symptoms or high-risk conditions, or should I be diagnosed with one of the above illnesses, I may be asked to change my job or to stop working altogether until such symptoms or illnesses have resolved.

I understand that failure to comply with the terms of this agreement could lead to action by the food establishment or the food regulatory authority that may jeopardize my employment and may involve legal action against me.

Food Employee or Conditional Food Employee Name (Please Print) Kelly Erin Surprenant  
Signature of Above-named Individual [Signature] Date 3/4/20  
Signature of Permit Holder or Representative [Signature] Date 3/4/20

This is a model form created by MA Department of Public Health which is offered as a tool for industry to use to aid in compliance with 105 CMR 590.002(E) and the Federal Food Code 2-201.11. The use of this form is voluntary and is not required by state regulation. Revised: October, 2018





## Personal Protective Equipment (PPE): Employee Training Certification

Person Performing Training Session (name/title):

John Snyder, Dir. of Operations

Date: 03/03/2020

Employee Full Name:

CHRISTOPHER GALLANT

Employee Signature:

[Handwritten Signature]

Items Covered During Training:

- ☒ When PPE is necessary
- ☒ What PPE is necessary
- ☒ How to properly put on, take off, adjust, and wear PPE
- ☒ Limitations and useful life of the PPE
- ☒ Proper care, maintenance, replacement, and disposal of PPE

Trainer Signature:

[Handwritten Signature]





## Hazard Communication Plan: Employee Training Certification

Person Performing Training Session (name/title):

John Snyder, Dir. of Operations

Date: 03/03/2020

Employee Full Name:

CHRISTOPHER GREEN

Employee Signature:

A blue ink signature of Christopher Green, consisting of a large 'C' and 'G' followed by the name 'CHRISTOPHER GREEN' in a stylized script.

Items Covered During Training:

- ☒ An overview of the requirements in OSHA's Hazard Communication Standard.
- ☒ Hazardous chemicals present in their workplace.
- ☒ Any operations in their work area where hazardous chemicals are used.
- ☒ The location of the written hazard communication plan and where it may be reviewed.
- ☒ How to understand and use the information on labels and in Safety Data Sheets.
- ☒ Physical and health hazards of the chemicals in their work areas.
- ☒ Methods used to detect the presence or release of hazardous chemicals in the work area.
- ☒ Steps we have taken to prevent or reduce exposure to these chemicals.
- ☒ How employees can protect themselves from exposure to these hazardous chemicals through the use of engineering controls/work practices and personal protective equipment.
- ☒ An explanation of any special labeling present in the workplace.
  - ☒ What are pictograms?
  - ☒ What are the signal words?
  - ☒ What are the hazard statements?
  - ☒ What are the precautionary statements?
- ☐ Emergency procedures to follow if an employee is exposed to these chemicals.

Trainer Signature:

A black ink signature of John Snyder, featuring a large 'J' and 'S' followed by the name 'JOHN SNYDER' in a stylized script.





## Fire Protection Plan: Employee Training Certification

Person Performing Training Session (name/title):

John Snyder, Dir. of Operations

Date: 03/03/2020

Employee Full Name:

CHRISTOPHER GRIFFIN

Employee Signature:

[Handwritten Signature]

Items Covered During Training:

☒ **Fire Prevention Plan**

**What to do if employee discovers a fire**

- How to Raise the Alarm
- How to Recognize Fire Exits
- Evacuation Routes
- Assisting Persons with Disabilities
- Measures to contain fire (closing doors, etc.)
- Immediate Evacuation
- Assembly Areas
- Return to Building After "All Clear" Signal

☒ **Fire Drills**

Trainer Signature:

[Handwritten Signature]





## Emergency Action Plan: Employee Training Certification

Person Performing Training Session (name/title):

John Snyder, Dir. of Operations

Date: 03/03/2020

Employee Full Name:

CHRISTOPHER GALT

Employee Signature:

[Signature]

Items Covered During Training:

☐ Possible Incidents Requiring Evacuation

☐ Assembly Areas

☐ Ensuring a safe and orderly evacuation

Trainer Signature:

[Signature]



## Food Employee Reporting Agreement

### Preventing Transmission of Diseases through Food by Infected Food Employees

The purpose of this agreement is to ensure that Food Employees and Conditional Employees notify the Person in Charge when they experience any of the conditions listed so that the Person in charge can take appropriate steps to preclude the transmission of foodborne illness.

#### I AGREE TO REPORT TO THE PERSON IN CHARGE:

##### A. SYMPTOMS OF:

diarrhea, vomiting, jaundice, sore throat with fever, and lesions containing pus on the hand, wrist, or an exposed body part (such as boils and infected wounds, however small.)

##### B. MEDICAL DIAGNOSIS OF BEING ILL WITH:

norovirus, shiga toxin-producing *E. coli*, *S. typhi* (typhoid fever), *Shigella* spp., non-typhoidal *Salmonella*, and Hepatitis A, as well as other diseases that may be transmitted through food per 105 CMR 300.000. Contact the Food Protection Program at 617-983-6712 or The Epidemiology Program at 617-983-6800 for additional information.

##### C. PAST MEDICAL DIAGNOSIS OF DISEASES LISTED ABOVE:

Have you ever been diagnosed as being ill with one of the diseases listed above? \_\_\_\_\_  
If you have, what was the date of the diagnosis? \_\_\_\_\_

##### D. HIGH-RISK CONDITIONS:

- Exposure to or suspicion of causing any confirmed outbreak of the diseases listed under Part B above.
- A household member has been diagnosed with diseases listed in Part B above.
- A household member attending or working in a setting experiencing a confirmed outbreak of one of the diseases listed in part B above.

I have read (or had explained to me) and understand the requirements concerning my responsibilities under 105 CMR 590/2013 Food Code and this agreement to comply with the reporting requirements specified above involving symptoms, diagnoses, and high-risk conditions specified. I also understand that should I experience one of the above symptoms or high-risk conditions, or should I be diagnosed with one of the above illnesses, I may be asked to change my job or to stop working altogether until such symptoms or illnesses have resolved.

I understand that failure to comply with the terms of this agreement could lead to action by the food establishment or the food regulatory authority that may jeopardize my employment and may involve legal action against me.

Food Employee or Conditional Food Employee Name (Please Print) CHRISTOPHER GARCIA

Signature of Above-named Individual [Signature] Date 3/4/20

Signature of Permit Holder or Representative [Signature] Date 3/4/20

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# ServSafe® CERTIFICATION

## CHRISTOPHER GALLANT

for successfully completing the standards set forth for the ServSafe® Food Protection Manager Certification Examination, which is accredited by the American National Standards Institute (ANSI)—Conference for Food Protection (CFP).

18298348

CERTIFICATE NUMBER

8/31/2019

DATE OF EXAMINATION

Local laws apply. Check with your local regulatory agency for recertification requirements.

10710

EXAM FORM NUMBER

8/31/2024

DATE OF EXPIRATION



*Sherman Brown*  
Sherman Brown  
Executive Vice President, National Restaurant Association Solutions







## Personal Protective Equipment (PPE): Employee Training Certification

Person Performing Training Session (name/title):

John Snyder, Dir. of Operations

Date: 03/03/2020

Employee Full Name:

John Henderson

Employee Signature:

[Signature]

Items Covered During Training:

- ☒ When PPE is necessary
- ☒ What PPE is necessary
- ☒ How to properly put on, take off, adjust, and wear PPE
- ☒ Limitations and useful life of the PPE
- ☒ Proper care, maintenance, replacement, and disposal of PPE

Trainer Signature:

[Signature]





## Hazard Communication Plan: Employee Training Certification

Person Performing Training Session (name/title):

John Snyder, Dir. of Operations

Date: 03/03/2020

Employee Full Name:

John Henderson

Employee Signature:

[Signature]

Items Covered During Training:

- ☒ An overview of the requirements in OSHA's Hazard Communication Standard.
- ☒ Hazardous chemicals present in their workplace.
- ☒ Any operations in their work area where hazardous chemicals are used.
- ☒ The location of the written hazard communication plan and where it may be reviewed.
- ☒ How to understand and use the information on labels and in Safety Data Sheets.
- ☒ Physical and health hazards of the chemicals in their work areas.
- ☒ Methods used to detect the presence or release of hazardous chemicals in the work area.
- ☒ Steps we have taken to prevent or reduce exposure to these chemicals.
- ☒ How employees can protect themselves from exposure to these hazardous chemicals through the use of engineering controls/work practices and personal protective equipment.
- ☒ An explanation of any special labeling present in the workplace.
  - What are pictograms?
  - What are the signal words?
  - What are the hazard statements?
  - ☒ What are the precautionary statements?
- ☒ Emergency procedures to follow if an employee is exposed to these chemicals.

Trainer Signature:

[Signature]





## Fire Protection Plan: Employee Training Certification

Person Performing Training Session (name/title):

John Snyder, Dir. of Operations

Date: 03/03/2020

Employee Full Name:

John Henderson

Employee Signature:

[Signature]

Items Covered During Training:

✓

### Fire Prevention Plan

✓

#### What to do if employee discovers a fire

- How to Raise the Alarm
- How to Recognize Fire Exits
- Evacuation Routes
- Assisting Persons with Disabilities
- Measures to contain fire (closing doors, etc.)
- Immediate Evacuation
- Assembly Areas
- Return to Building After "All Clear" Signal

✓

### Fire Drills

Trainer Signature:

[Signature]





## Emergency Action Plan: Employee Training Certification

Person Performing Training Session (name/title):

John Snyder, Dir. of Operations

Date: 03/03/2020

Employee Full Name:

John Henderson

Employee Signature:

[Handwritten Signature]

Items Covered During Training:

- ☒ Possible Incidents Requiring Evacuation
- ☒ Assembly Areas
- ☒ Ensuring a safe and orderly evacuation

Trainer Signature:

[Handwritten Signature]



## Food Employee Reporting Agreement

### Preventing Transmission of Diseases through Food by Infected Food Employees

The purpose of this agreement is to ensure that Food Employees and Conditional Employees notify the Person in Charge when they experience any of the conditions listed so that the Person in charge can take appropriate steps to preclude the transmission of foodborne illness.

#### I AGREE TO REPORT TO THE PERSON IN CHARGE:

##### A. SYMPTOMS OF:

diarrhea, vomiting, jaundice, sore throat with fever, and lesions containing pus on the hand, wrist, or an exposed body part (such as boils and infected wounds, however small.)

##### B. MEDICAL DIAGNOSIS OF BEING ILL WITH:

norovirus, shiga toxin-producing *E. coli*, *S. typhi* (typhoid fever), *Shigella* spp., non-typhoidal *Salmonella*, and Hepatitis A, as well as other diseases that may be transmitted through food per 105 CMR 300.000. Contact the Food Protection Program at 617-983-6712 or The Epidemiology Program at 617-983-6800 for additional information.

##### C. PAST MEDICAL DIAGNOSIS OF DISEASES LISTED ABOVE:

Have you ever been diagnosed as being ill with one of the diseases listed above? \_\_\_\_\_

If you have, what was the date of the diagnosis? \_\_\_\_\_

##### D. HIGH-RISK CONDITIONS:

- Exposure to or suspicion of causing any confirmed outbreak of the diseases listed under Part B above.
- A household member has been diagnosed with diseases listed in Part B above.
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I have read (or had explained to me) and understand the requirements concerning my responsibilities under 105 CMR 590/2013 Food Code and this agreement to comply with the reporting requirements specified above involving symptoms, diagnoses, and high-risk conditions specified. I also understand that should I experience one of the above symptoms or high-risk conditions, or should I be diagnosed with one of the above illnesses, I may be asked to change my job or to stop working altogether until such symptoms or illnesses have resolved.

I understand that failure to comply with the terms of this agreement could lead to action by the food establishment or the food regulatory authority that may jeopardize my employment and may involve legal action against me.

Food Employee or Conditional Food Employee Name (Please Print) John Henderson

Signature of Above-named Individual [Signature] Date 3/4/20

Signature of Permit Holder or Representative [Signature] Date 3/4/20

This is a model form created by MA Department of Public Health which is offered as a tool for industry to use to aid in compliance with 105 CMR 590.002(E) and the Federal Food Code 2-201.11. The use of this form is voluntary and is not required by state regulation. Revised: October, 2018





## Personal Protective Equipment (PPE): Employee Training Certification

Person Performing Training Session (name/title):

John Snyder, Dir. of Operations

Date: 03/03/2020

Employee Full Name:

Danielle Rouse

Employee Signature:

Danielle Rouse

Items Covered During Training:

- ☒ When PPE is necessary
- ☒ What PPE is necessary
- ☒ How to properly put on, take off, adjust, and wear PPE
- ☒ Limitations and useful life of the PPE
- ☒ Proper care, maintenance, replacement, and disposal of PPE

Trainer Signature:

John Snyder





## Hazard Communication Plan: Employee Training Certification

Person Performing Training Session (name/title):

John Snyder, Dir. of Operations

Date: 03/03/2020

Employee Full Name:

Danielle Rouse

Employee Signature:

A handwritten signature in blue ink, appearing to read 'Danielle Rouse', written over a horizontal line.

Items Covered During Training:

- ☒ An overview of the requirements in OSHA's Hazard Communication Standard.
- ☒ Hazardous chemicals present in their workplace.
- ☒ Any operations in their work area where hazardous chemicals are used.
- ☒ The location of the written hazard communication plan and where it may be reviewed.
- ☒ How to understand and use the information on labels and in Safety Data Sheets.
- ☒ Physical and health hazards of the chemicals in their work areas.
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- ☒ How employees can protect themselves from exposure to these hazardous chemicals through the use of engineering controls/work practices and personal protective equipment.
- ☒ An explanation of any special labeling present in the workplace.
  - What are pictograms?
  - What are the signal words?
  - What are the hazard statements?
  - What are the precautionary statements?
- ☒ Emergency procedures to follow if an employee is exposed to these chemicals.

Trainer Signature:

A handwritten signature in black ink, appearing to read 'John Snyder', written over a horizontal line.





## Fire Protection Plan: Employee Training Certification

Person Performing Training Session (name/title):

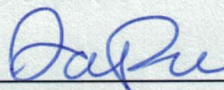
John Snyder, Dir. of Operations

Date: 03/03/2020

Employee Full Name:

Danielle Rouse

Employee Signature:



Items Covered During Training:



### **Fire Prevention Plan**



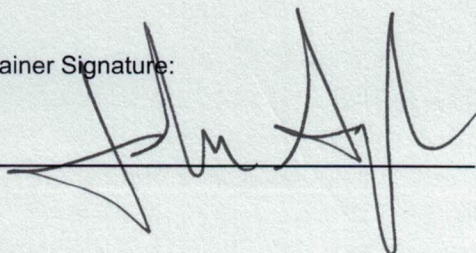
### **What to do if employee discovers a fire**

- How to Raise the Alarm
- How to Recognize Fire Exits
- Evacuation Routes
- Assisting Persons with Disabilities
- Measures to contain fire (closing doors, etc.)
- Immediate Evacuation
- Assembly Areas
- Return to Building After "All Clear" Signal



### **Fire Drills**

Trainer Signature:







## Emergency Action Plan: Employee Training Certification

Person Performing Training Session (name/title):

John Snyder, Dir. of Operations

Date: 03/03/2020

Employee Full Name:

Danielle Prouse

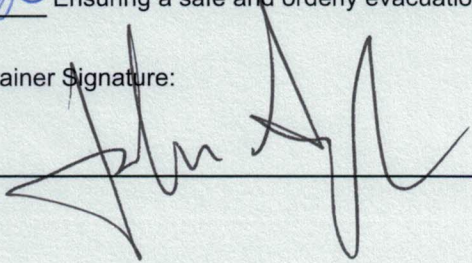
Employee Signature:



Items Covered During Training:

- ☒ Possible Incidents Requiring Evacuation
- ☒ Assembly Areas
- ☒ Ensuring a safe and orderly evacuation

Trainer Signature:





## Food Employee Reporting Agreement

### Preventing Transmission of Diseases through Food by Infected Food Employees

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##### C. PAST MEDICAL DIAGNOSIS OF DISEASES LISTED ABOVE:

Have you ever been diagnosed as being ill with one of the diseases listed above? \_\_\_\_\_  
If you have, what was the date of the diagnosis? \_\_\_\_\_

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- Exposure to or suspicion of causing any confirmed outbreak of the diseases listed under Part B above.
- A household member has been diagnosed with diseases listed in Part B above.
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I understand that failure to comply with the terms of this agreement could lead to action by the food establishment or the food regulatory authority that may jeopardize my employment and may involve legal action against me.

Food Employee or Conditional Food Employee Name (Please Print) Danielle Rouse

Signature of Above-named Individual  Date 3/4/20

Signature of Permit Holder or Representative  Date 3/4/20

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**ServSafe**  
National Restaurant Association

# ServSafe® CERTIFICATION

## DANIELLE ROUSE

for successfully completing the standards set forth for the ServSafe® Food Protection Manager Certification Examination, which is accredited by the American National Standards Institute (ANSI)—Conference for Food Protection (CFP).

18298349

CERTIFICATE NUMBER

8/31/2019

DATE OF EXAMINATION

Local laws apply. Check with your local regulatory agency for recertification requirements.

10710

EXAM FORM NUMBER

8/31/2024

DATE OF EXPIRATION



*Sherman Brown*  
Sherman Brown  
Executive Vice President, National Restaurant Association Solutions





# CERTIFICATE OF ALLERGEN AWARENESS TRAINING

Name of Recipient: DANIELLE ROUSE

Certificate Number: 4080629

Date of Completion: 9/20/2019

Date of Expiration: 9/20/2024



Issued By:

*The above-named person is hereby issued this certificate  
for completing an allergen awareness training program  
recognized by the Massachusetts Department of Public Health  
in accordance with 105 CMR 590.009(G)(3)(a).*

*This certificate will be valid for five (5) years from date of completion.*



Massachusetts Restaurant Association  
333 Turnpike Road, Suite 102  
Southborough, MA 01772  
508-303-9905  
[www.marcarestaurantassoc.org](http://www.marcarestaurantassoc.org)







# ServSafe® CERTIFICATION

## KELLY LAUGHTON

for successfully completing the standards set forth for the ServSafe® Food Protection Manager Certification Examination, which is accredited by the American National Standards Institute (ANSI)—Conference for Food Protection (CFP).

18298347

CERTIFICATE NUMBER

8/31/2019

DATE OF EXAMINATION  
Local laws apply. Check with your local regulatory agency for recertification requirements.

10710

EXAM FORM NUMBER

8/31/2024

DATE OF EXPIRATION



#0655

*Sherman Brown*  
Sherman Brown  
Executive Vice President, National Restaurant Association Solutions





# ServSafe<sup>®</sup> CERTIFICATION

## JOHN SNYDER

for successfully completing the standards set forth for the ServSafe<sup>®</sup> Food Protection Manager Certification Examination, which is accredited by the American National Standards Institute (ANSI)—Conference for Food Protection (CFP).

18298350

CERTIFICATE NUMBER

8/31/2019

DATE OF EXAMINATION

Local laws apply. Check with your local regulatory agency for recertification requirements.

10710

EXAM FORM NUMBER

8/31/2024

DATE OF EXPIRATION



Sherman Brown  
Executive Vice President, National Restaurant Association Solutions

A handwritten signature in black ink, appearing to read 'Sherman Brown', written over a horizontal line.





# CERTIFICATE OF ALLERGEN AWARENESS TRAINING

Name of Recipient: JOHN SNYDER

Certificate Number: 4079040

Date of Completion: 9/19/2019

Date of Expiration: 9/19/2024



Issued By:

*The above-named person is hereby issued this certificate  
for completing an allergen awareness training program  
recognized by the Massachusetts Department of Public Health  
in accordance with 105 CMR 590.009(G)(3)(a).*

*This certificate will be valid for five (5) years from date of completion.*



Massachusetts Restaurant Association  
333 Turnpike Road, Suite 102  
Southborough, MA 01772  
508-303-9905  
[www.massrestaurantassoc.org](http://www.massrestaurantassoc.org)



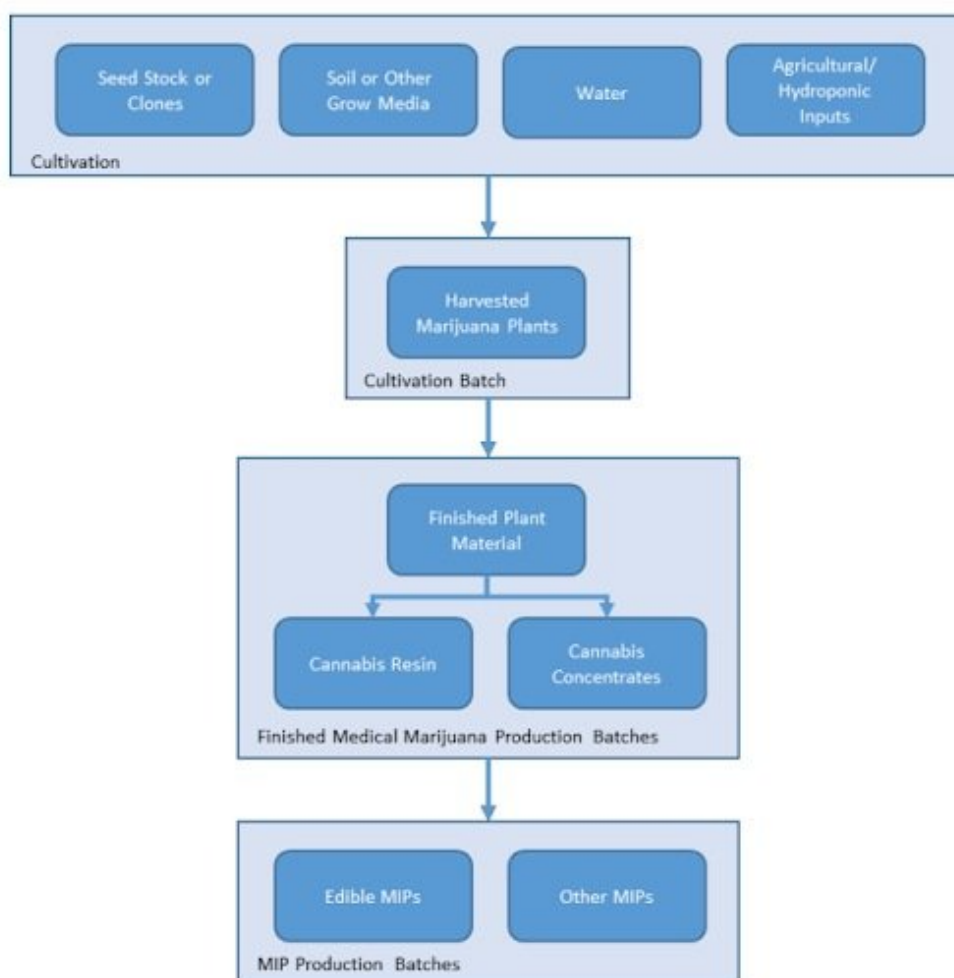




# Product Testing & QC - Cultivation and Manufacturing

Before product can be transferred and/or sold, it must be tested for contaminants. SOP & Training

Written By: Hannah Ward



## INTRODUCTION

## RESPONSIBLE EMPLOYEES

COO

Compliance Manager

Lab Manager

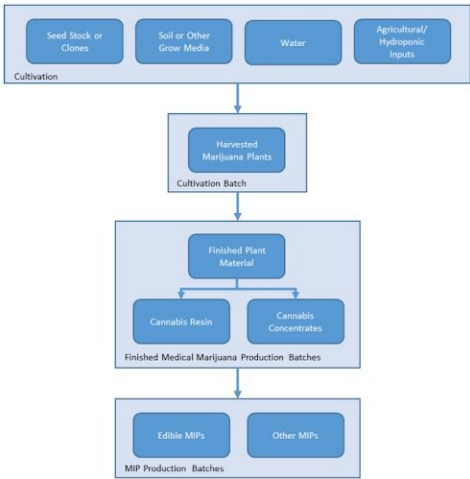
Production Manager

---

### **TOOLS:**

- Sample collection plan for each product type (1)
- Online Test Sample Form (1)
- Disposable gloves (1)
- Disposable tools: spatula, tweezers (1)
- Stainless steel bowl and implement to homogenize the product (e.g., by stirring, chopping, or grinding) (1)
- Clean, decontaminated surface for sample processing (1)
- Sterile bags/container (1)
- Bag labels and pen with permanent ink; (1)
- Supplies to thoroughly clean, decontaminated and dry sampling equipment between samples (1)
- A cooler with ice (or refrigeration) to keep samples cool until refrigeration or shipment to the laboratory (1)

— Product Sampling Requirements



Homogeneity	Mass of Production Batch (kg)	Minimum Number of Samples/subsamples	Collection Method
Production batch can be homogenized or assumed to be well mixed or homogenous	Any production batch mass	1 sample	Mix product  Withdraw amount sufficient for evaluation Submit to laboratory for analysis
Production batch cannot be homogenized or is of unknown homogeneity	≤1	3 subsamples	Mix product to degree possible Withdraw subsamples from different areas (such as lower, middle, and upper portions of container) Composite subsamples, if possible, to amount sufficient for evaluation Submit to laboratory for analysis
	1-5	5 subsamples	
	≥5	10 subsamples	

- Sample analysis will include:
  - Cannabinoid Profile (must include Delta9-THC, THCa, CBD, CBDa)
  - Metals
  - Pesticide Residues and Plant Growth Regulators
  - Microbiological Contaminants and Mycotoxins
  - For concentrates only: Residual Solvent (Propane, Butant, EToH)
  - VEA - Vitamin E Test for Vape Products only
- CCC's Testing workflow, as well as a chart of the required amount of samples. is pictured to the left



## — Product Problems

- Product problems should be reported to the CCC when there is a concern about the quality, authenticity, performance, or safety of any finished medical marijuana or MIPs. Problems with product quality may occur during manufacturing, shipping, or storage. These may include:
  - suspect counterfeit product;
  - product contamination;
  - defective components;
  - poor packaging or product mix-up;
  - questionable stability; and
  - labeling concerns


## — Finished Plant Material or Friable MIPs

- Sampling shall be performed such that the dried and trimmed inflorescences, or buds, of the marijuana plant that are collected are representative in maturity and composition of the entire production batch of finished plant material.
- The sampling timeframe for marijuana buds shall be after the completion of the finishing (i.e., drying and trimming) of the plant material production batch.
- USP guidance for sampling articles of botanical origin (USP Chapter <561>) recommends that, for items with component parts larger than 1 cm in any dimension, samples should be withdrawn by hand, then combined and mixed prior to analysis.
- ISO 1839-1980 also states that if the primary samples consist of loose material, they should be combined to constitute the bulk sample for evaluation.
- Quartering is a method to promote the representativeness of a homogenized medical marijuana sample.
- Quartering involves heaping the adequately mixed and homogenized ground product into a square shape, dividing the heap into four equal quarters, and selecting samples from two of the opposite quarters, which are mixed and sampled (Sexton and Ziskind, 2013; USP Chapter <561>; WHO, 2007).
- The remaining quarters may then be combined and mixed, then used for microbiological and contaminant testing (Sexton and Ziskind, 2013; USP Chapter <561>; WHO, 2007). The quartering process may be repeated until the required quantity is obtained, and the remaining material may be returned to the batch if possible (USP Chapter <561>; WHO, 2007).

## — Duplicate Samples

- Duplicate samples shall be collected to provide verification of sampling and laboratory procedures.
- Specifically, a duplicate should be collected for 5 percent (1 per 20) of the samples collected for each medical marijuana product type. Duplicate samples shall not be identified to the laboratory (this is considered blind quality control). Duplicate samples are used to evaluate any variance in the sampling and analysis procedures.
- To ensure authenticity, it should be noted that QC samples should be taken on the same day, be derived from the same batch and documented on the test results tracking sheet. QC samples should be a duplicate of the same plant material as much as possible when quartering.

### — Sampling Continued



**Test Sample Collection Form - Cultivation**

Prior to Sample Collection, via assembly all equipment and information needed before beginning sampling. Items to assemble before sampling include the following:

- Disposable gloves
- Disposable food-grade & tweezers
- Stainless steel bowl and implement to homogenize the product (e.g., by stirring, chopping, or grinding)
- Clean, decontaminated surface for sample processing
- Sterile bags
- Bag labels and pen with permanent ink
- Supplies to thoroughly clean, decontaminate and dry sampling equipment between samples and
- Cooler with ice (or refrigeration) to keep samples cool until refrigeration or shipment to the laboratory.

Label on final sample shall include:

- Batch & Sample IDs
- Date & Time of Collection
- Sample Personnel

Sampler 1

First Name:  Last Name:

Sampler 2

First Name:  Last Name:

Testing Lab \*

Collection Date & Start Time

Jun 2 10:20 2020 PM

Product Type

Net Weight of Sample

Product Description

Batch ID

Sample ID

Number of Subsamples Taken

Gross Weight of Sample

Accurate Representation Procedure

☐ Shovel  
☐ Mix  
☐ Other:

Duplicate Sample?

☒ No  
☐ Yes

Associated METRC Package Number

Solvents Used

☐ CO2  
☐ Butane  
☐ Propane  
☐ KSH  
For CO2, indicate purity.

- Sample collection personnel should create a new entry for each sampling event in a sample collection logbook or prepare sample collection forms for documentation of sample collection.
- Sample collection documentation should identify the sample collection date & start time, participating personnel, a general description of the product type & batch number sampled, a description of the sampling procedures used, & a record of batches that would potentially be impacted should analysis results indicate unacceptable contamination levels

- Sample collection personnel shall identify or determine the cultivation batch number, production batch, and number of samples to be collected based on the guidance provided in Section 5, as well as further guidance obtained in consultation with the laboratory.
- The number of samples taken from each cultivation and/or production batch must be recorded in the sample collection logbook or forms. Record the sample cultivation and production batch identifiers (ID) for each sample.
- The batch IDs will be included on sample labels. In addition to the batch ID, create a unique sample ID for each sample. Sample identifiers should be unique for a given sample event. Record the batch and sample IDs in the sample collection logbook.
- Any tools that contact the samples should be made of stainless steel or other inert material to avoid potential contamination of the sample. Appropriate sample containers should be made of suitable materials.

## — Labeling Samples

- Preparing sample labels and affixing them to sample containers immediately before sampling is recommended. Information to include on the label includes at a minimum the batch and sample IDs and date/time of collection and by whom.
- Additional information that must be recorded in documentation, if not on the label, includes sample collector's name, product type, collection method, and other details about the product, such as MIP type or production method.

## — Sample Collection

- Wear disposable gloves to mitigate potential for contamination of samples.
- Ensure that the sampling area is clean and decontaminated and lay out any tools and equipment needed.
- Collect the sample using an appropriate tool. Do not touch the sample with your hands or allow the sample to touch anything that might cause cross contamination.
- If necessary, place the sample in the stainless steel bowl or on a decontaminated cutting surface for homogenizing the sample using either the sample collection tool or separate clean, decontaminated implement.
- Record the time each sample was collected and record any difficulties, inconsistencies with the sampling plan, or other remarks (e.g., environmental conditions) that might be relevant to data analysis or quality assurance.
- To avoid cross contamination of samples, any tools or equipment that comes in contact with the finished plant material or other marijuana products should be cleaned before collecting the next sample.
- All samples should be placed in clean, airtight sample containers that are large enough to hold the prescribed sample quantity with minimal headspace. Sample containers must be firmly closed and appropriately labeled.
- To preserve the chemical and biological composition of the samples, they should be refrigerated or maintained on ice until shipped to the analytical laboratory. Chain-of-custody paperwork should be completed immediately prior to shipment to the analytical laboratory.

## — Sampling Continued 2

- Marijuana products and MIPs, especially solids or semi-solids such as finished plant material, may be heterogeneous with respect to distribution of cannabinoids or contaminants. To obtain a representative sample, liquid products should be thoroughly stirred or mixed before sampling. Solid and semi-solid products must be ground and thoroughly mixed.
- Another method to promote the representativeness of a ground marijuana product is quartering. Quartering involves heaping the ground product, dividing the heap into four equal quarters, and selecting samples from two of the quarters, which are combined and mixed (Sexton and Ziskind, 2013).
- The remaining quarters may then be combined and mixed, then used for microbiological and contaminant testing (Sexton and Ziskind, 2013).

## — Additional Notes

- All testing records are to be maintained in the cultivation office & Manufacturing Office for no less than one year.
- Seeds and clones do not need to be tested prior to sale.
- All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services shall comply with 935 CMR 500.105(13).
- No marijuana product shall be sold or otherwise marketed for adult use that has not first been tested.
- Currently, the two testing labs 253 Farmacy sends samples to are:
  - MCR Labs - 85 Speen St, Framingham, MA 01701 (508) 872-6666 <https://mcrlabs.com/>
  - CDX Analytics - 39 Norman St, Salem, MA 01970 (978) 619-2244 <https://cdxanalytics.com/>



## — MCR Labs Requirements

[illegible]

MCR TESTING CODES FOR REFERENCE									
CH= Cannabinoid Profile	F= Flower	A= Ambient, Dark	CN	MB	MY	HM	PS	VC	VEA
MB= Microbiological	MP	B= Refrigerated, Dark Full Flower (8)	1	1	1	1	1		
MY= Mycotoxins	C= Concentrate	C= Frozen, Dark Full MMP (0)	1	1	1				
HM= Heavy Metals	E= Extract	Full Concentrate (1)	1	1	1	1		1	
PS= Pesticide Screen	O= Other	Vape Product (2)	1	1	1	1		1	1
VC= Volatile Organic Compounds		Full Extract(3)	1	1	1	1			
TP= Terpene Profile									
VEA= Vitamin E Acetate Test									

- MCR Labs has a specific manifest in Excel format that is to be completed and emailed ahead of sample pick up.
- MCR Labs - 85 Speen St, Framingham, MA 01701 (508) 872-6666 <https://mcrlabs.com/>
  - Pick-Ups are Fridays, time & details are confirmed in advance via text.
- ALL SAMPLES MUST BE COMPLETED BY THURSDAY AT THE END OF BUSINESS OR THEY GO THE FOLLOWING WEEK

## — CDX Analytics Requirements

**CDX Analytics**  
39 Norman St, Salem, MA 01970  
(978) 619-2244  
<https://cdxanalytics.com/>

**Manifest Information**

Manifest Number	Date
Time	Location
Contact	

**Instructions:**

1. Fill in "Product Name" in previous field of the top of the first page.
2. Complete the rest of the form.
3. Separate the list of information for each sample from the rest.
4. "Sample ID" should be unique for each sample.
5. Provide a general name for each sample and complete the rest of the information on the table below.
6. "Sample Date" should be the date of collection for each sample.
7. "Sample Time" should be the time of collection for each sample.
8. "Sample Location" should be the location of collection for each sample.
9. "Sample Status" should be the status of the sample (e.g., "In Progress", "Completed", "Failed").
10. "Sample Notes" should be used for any additional information.
11. "Sample Results" should be used for the results of the analysis.

Sample ID	Sample Name	Sample Type	Sample Source	Sample Date	Sample Time	Sample Location	Sample Status	Sample Notes	Sample Results
-----------	-------------	-------------	---------------	-------------	-------------	-----------------	---------------	--------------	----------------

- All samples must be listed on their manifest provided in excel format
- Manifest must be emailed in advance of pick up
- CDX Analytics - 39 Norman St, Salem, MA 01970 (978) 619-2244  
<https://cdxanalytics.com/>
- Pickups are Thursdays, confirmed in advance via text.



**ALL SAMPLES MUST BE COMPLETED BY WEDNESDAY AT THE END OF BUSINESS OR THEY GO THE FOLLOWING WEEK**

## — Notes on RE-TESTing

- Make sure the method of remediation is recorded in METRC before a re-test sample is taken & submitted
- A package can fail 1 time. It should be sent to an alternate lab if possible. If it fails 2x, the product can be destroyed or must be turned into a different product i.e. wax or shatter can be winterized and distilled into THC Distillate.
- For example if it is first sent to MCR & fails, remediate & send to CDX for the item it failed. Most likely this will be VC (Volatile compounds).

## — Quality Control

- All flower & products are inspected visually to ensure it is free from debris and mold in addition to state mandated testing.



# Fire Protection Plan - Fire Hazards

This guide is to educate all employees on potential fire hazards in the work place.

Written By: Hannah Ward



## **INTRODUCTION**

The purpose of this policy is to outline the fire prevention plan in accordance with Occupational Safety and Health Administration (OSHA) regulations [29 CFR 1910.38(b)].

## **RESPONSIBLE EMPLOYEES**

Director of Operations

Compliance Manager - Updates as needed & Training

Department Managers - Enforcement & Training

All Employees - Understand all information contained in this plan

## **STATEMENT**

It is the policy of 253 Organic to notify all employees of the elements of the fire prevention plan and to expect employees to read and understand the information presented in this plan.

## — Lighting

- **Ballast Failure** - On occasion, the ballast of a light fixture will fail. In most cases, lights will begin to flicker as either the ballast or the tube begin to fail. However, in a few instances the ballast will simply go out, releasing smoke, oil or a burning odor. Turn off the light switch and notify the Director of Operations.
- ⚠ Do not stand under the ballast assembly or attempt to inspect it. If smoke persists, call the Fire Department at 911.
- **Bulb Failure** - Bulbs in the grow lights may fail and/or be defective. Sometimes, a defect can lead to a bulb exploding. To reduce the probability of bulb failure, they should be replaced in accordance with the manufacturers statement on bulb life.

## — Chemicals

- **Chemical Solutions and Transfers of Solids** – Unlabeled chemicals may pose a risk of fire, explosion, corrosiveness and/or toxicity to those exposed to the unknown chemical.
- Chemical solutions or transfers of solids made from the original container must be labeled with the full chemical name, name of the person making the solution or transfer, date, and all appropriate hazard warnings.

## — Electrical Appliances

- All electrical appliances used in the building should be UL approved and used only for their intended purpose.

## — Equipment Inspection

- Equipment should be visually inspected prior to use. Check to make sure that safety guards are in place where needed, wiring is in good condition, belts are tight, etc



## — Extension Cords and Outlets

- Use of extension cords and outlets in a wet environment may lead to electrocution or fire. Use GFCI protected outlets.
  - Keep electrical connections where it is unlikely they will get wet. Use extension cords only on a temporary basis, no longer than 90 days. Otherwise use a power surge protector for longer needs. Check integrity of cords regularly.
-



# Procedures for Hazardous Materials

Fire Protection Plan - Hazardous Materials

Written By: Hannah Ward



## INTRODUCTION

The purpose of this policy is to outline the fire prevention plan in regards to specific procedures for hazardous materials in accordance with Occupational Safety and Health Administration (OSHA) regulations [29 CFR 1910.38(b)].

## STATEMENT

It is the policy of 253 Organic to notify all employees of the elements of the fire prevention plan, communicate procedures for Hazardous Materials and to expect employees to read and understand the information presented in this plan.

## RESPONSIBLE EMPLOYEES

Director of Operations

Compliance Manager - Updates as needed & Training

Department Managers - Enforcement

All Employees - Understand all information contained in this plan

## — Know Your Chemicals!



- Read the labels and refer to MSDSs (Material Safety Data Sheet) to identify properties and hazards of chemical products and materials.
- Make sure all containers are properly labeled and that the material is contained in an appropriate container. Don't use any material not contained or labeled properly. Report any damaged containers or illegible labels to your supervisor right away.
- Store all materials properly, separate incompatibles, and store in ventilated, dry, cool areas.

## — Flammable Storage



- The following minimum restrictions apply in all areas of the facility as part of 253 Organic LLC's compliance with state fire regulations. Flammable chemicals are not to be stored in non-spark proof refrigerators.
- Up to 10 gallons of flammable chemicals may be kept in containers of one gallon or less.
- Up to 25 gallons may be kept in an area if the quantity in excess of the aforementioned 10 gallons is stored in two-gallon safety cans.
- Quantities in excess of 25 gallons but less than 60 gallons must be stored in the protection of approved flammable storage cabinets.
- Amounts in excess of 60 gallons per area must be stored in an approved chemical storage room.

## — Potential Ignition Sources and Control



- Natural gas and propane lines are present inside of the building and are a potential source of ignition.
- Additionally, the Lab (Production/Manufacturing) uses cylinders of gas (propane, butane, etc.) for extracting.
- If gas is smelled, there is a leak in the building and every employee must be evacuated.

 Dial 911.

- Cooking appliances shall be periodically inspected and maintained in proper working condition.



## — Fire Protection Equipment



- **Fire Alarms** - Buildings contain the proper fire detection and alarm systems, as per State Fire Protection Codes.
- **Chemical Suppression System** - The kitchen contains a chemical fire suppression system.
- **Fire Extinguishers** - Building contain fire extinguishers as required by the regulations.
- **Fire Doors and Barriers** - Building is equipped with the required fire doors and barriers. The automatic type will be kept in proper working order. Fire doors should never be propped or wedged open.
- **Emergency doors** - These doors shall be properly marked, and always kept clear of obstructions
- **Sprinklers** - Building is equipped with a sprinkler system
- **Maintenance of Fire Protection Equipment** - As indicated, properly certified outside contractors periodically inspect the building's fire protection systems to insure functionality.






## — Control of Accumulations of Flammable and Combustible Waste



Certain types of substances can ignite at relatively low temperatures or pose a risk of catastrophic explosion if ignited. Such substances obviously require special care and handling.

- Class A Combustibles
- Class B Combustibles

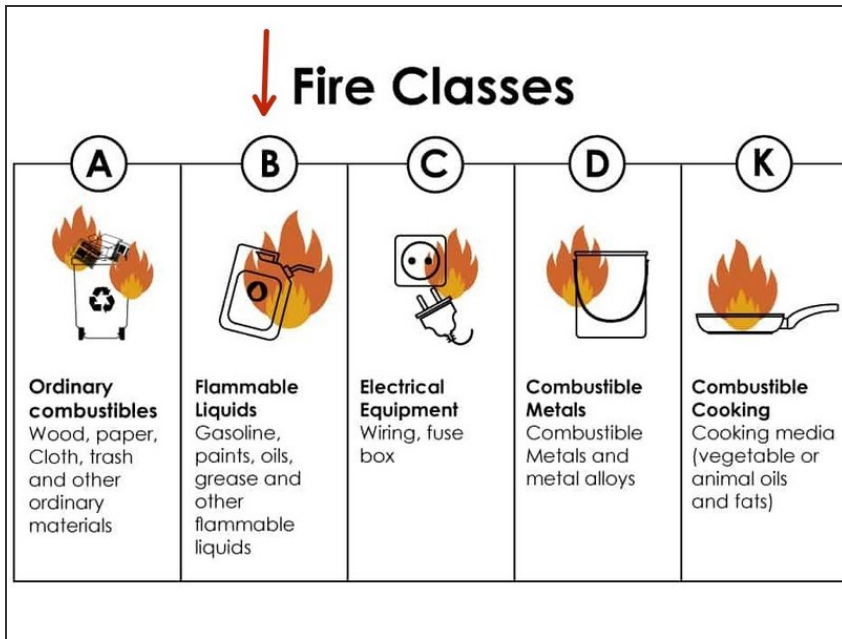
## — Class A Combustibles (Class A Fires)

Fire Classes				
A	B	C	D	K
				
<b>Ordinary combustibles</b> Wood, paper, Cloth, trash and other ordinary materials	<b>Flammable Liquids</b> Gasoline, paints, oils, grease and other flammable liquids	<b>Electrical Equipment</b> Wiring, fuse box	<b>Combustible Metals</b> Combustible Metals and metal alloys	<b>Combustible Cooking</b> Cooking media (vegetable or animal oils and fats)

★ These include common combustible materials (wood, paper, cloth, rubber, and plastics) that can act as fuel and are found in areas such as offices. To handle Class A combustibles safely:

- Dispose of waste daily.
  - Keep trash in metal-lined receptacles with tight-fitting covers (metal wastebaskets that are emptied every day do not need to be covered).
  - Keep work areas clean and free of fuel paths that could allow a fire to spread.
  - Keep combustibles away from accidental ignition sources, such as hot plates, soldering irons, or other heat- or spark-producing devices.
  - Store paper stock in metal cabinets.
  - Store rags in metal bins with self-closing lids.
- ⚠ Do not order excessive amounts of combustibles. Make frequent inspections to anticipate fires before they start.

## — Class B Combustibles (Class B Fires)



★ These include flammable and combustible liquids (oils, greases, tars, oil-based paints, and lacquers), flammable gases, and flammable aerosols. To handle Class B combustibles safely:

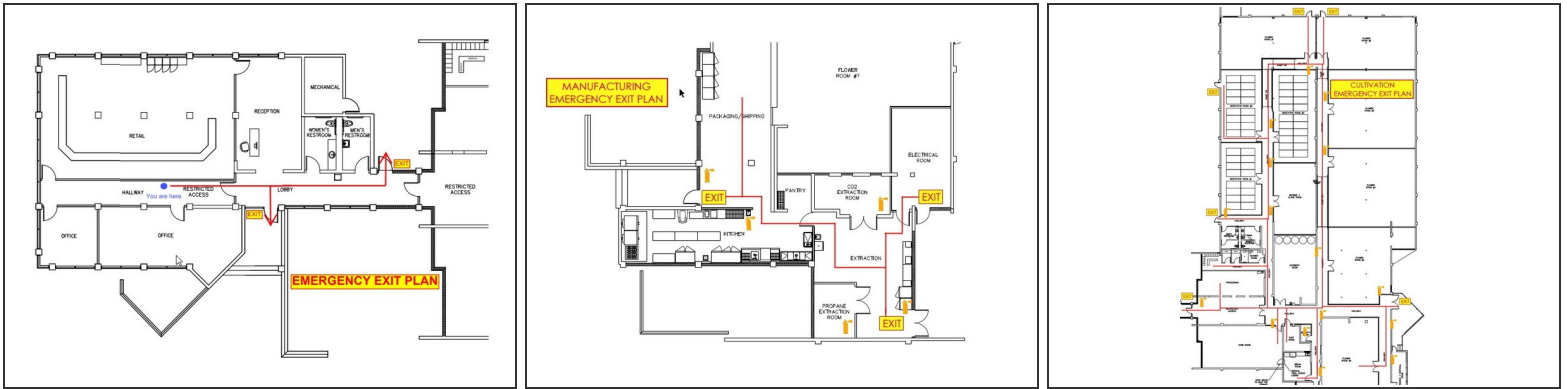
- Use only approved pumps, taking suction from the top, to dispense liquids from tanks, drums, barrels, or similar containers (or use approved self-closing valves or faucets).
- Do not dispense flammable liquids into containers unless the nozzle and container are electrically interconnected by contact or by a bonding wire. Either the tank or container must be grounded.
- Store, handle, and use Class B combustibles only in approved locations where vapors are prevented from reaching ignition sources such as heating or electric equipment, open flames, or mechanical or electric sparks.
- Dispose of oily rags, towels etc. promptly and properly. Do not use, handle, or store Class B combustibles near exits, stairs, or any other areas normally used as exits.

- Do not weld, cut, grind, or use unsafe electrical appliances or equipment near Class B combustibles. Do not generate heat, allow an open flame, or smoke near Class B combustibles.
- Know the location of and how to use the nearest portable fire extinguisher rated for Class B fire. Water should not be used to extinguish Class B fires caused by flammable liquids.
- Water can cause the burning liquid to spread, making the fire worse. To extinguish a fire caused by flammable liquids, exclude the air around the burning liquid using a fire extinguisher.

### — Regular Maintenance on Heat Producing Equipment


- HVAC system will have professional maintenance performed at least once a year to ensure proper functionality.
- Any hot plates or other producing devices will be inspected regularly for proper functionality.

## — Fire Evacuation Map



- 3 maps - Cultivation, Manufacturing & Retail
- Each map shows the emergency exits as well as the location of each fire extinguisher
- Printed maps are also posted around the facility, in each department.

## — Fire safety training

 **All Employees** will be trained in fire safety

- **Fire Prevention Plan**- where is it and what does it say.
  - What to do if employee discovers a fire
    - How to raise the alarm
    - How to recognize fire exits, Assembly areas, Return to building after the "all-clear" signal
    - Evacuation routes & Immediate evacuation
    - Assisting persons with disabilities, Measures to contain fire (e.g., closing office doors, windows, etc. in immediate vicinity)
- **Fire Drills**- Director of Operations is responsible to ensure that the required number of Fire Drills (2) per year are conducted and records of same are kept.



The Director of Operations shall review this Fire Prevention Plan at least annually for necessary changes.

Employees will be trained in the above procedures upon hiring as well as periodically.



# Personal Protective Equipment

Written By: Hannah Ward



## INTRODUCTION

To assess the need for Personal Protective Equipment (PPE), a survey of the workplace must be completed. The purpose of the survey is to identify activities, tasks, or equipment that create hazards that can be minimized by the use of appropriate PPE. Results of this assessment can be found in the attached PDF document.

## RESPONSIBLE EMPLOYEES

COO

Compliance Manager

All Employees

## — PPE DETERMINATION



- Each of the basic hazards shall be reviewed and a determination made as to the type, level of risk, and seriousness of potential injury.
- Consideration shall be given to the possibility of exposure to several hazards at once.
- The general procedure for determining appropriate protective equipment is to:
  - 1. Evaluate the level of risk and seriousness of potential injury.
  - 2. Identify the type of protective equipment that is available, and what protection it provides.
  - 3. Compare the capabilities of various types of PPE to the hazards employees are exposed too.
  - 4. Select the PPE that provides a level of protection greater than the minimum required to protect employees from the hazards.
  - 5. Select PPE that will fit each employee properly and provides protection from the hazard.

## — EMPLOYEE TRAINING



- After proper PPE for each task or area has been selected, train each employee in its proper use. At a minimum, each employee using PPE must know:
  - 1. When PPE is necessary
  - 2. What PPE is necessary and which PPE has been selected for each process the employee operates
  - 3. How to properly put on, take off, adjust and wear PPE
  - 4. The limitations of the PPE
  - 5. How to determine if PPE is no longer effective or is damaged
  - 6. How to get replacement PPE
  - 7. How to properly care for, maintain, store, and dispose of PPE

## — Employee Training Continued

- You can learn this information from the manufacturer's instructions, Internet sites (such as the manufacturer, distributor or related associations), safety associations, books and videos. After employees have been trained, periodic assessment of the hazard assessment should be conducted to ensure that the PPE and training is adequate.

---

## — Retraining of employees is required whenever

- 1. Changes in the workplace render the previous training obsolete.
  - 2. Changes in the type of PPE render previous training obsolete.
  - 3. Observed inadequacies in an employees' knowledge or use of assigned PPE that indicates an employee has not retained the necessary understanding or skill.
  - Dir. Of Operations must verify that each employee who is required to use PPE has received and understood the required training.
-





# Workplace Hazards & Warnings

Written By: Hannah Ward



## INTRODUCTION

The **Compliance Manager** is responsible to ensure that employees receive Workplace Hazards & Warnings training. After attending the training, employees will sign a form verifying that they understand the above topics and how the topics are related to our hazard communication plan.

Prior to introducing a new chemical hazard into any department , each employee in that department will be given information and training as outlined above for the new chemical hazard.

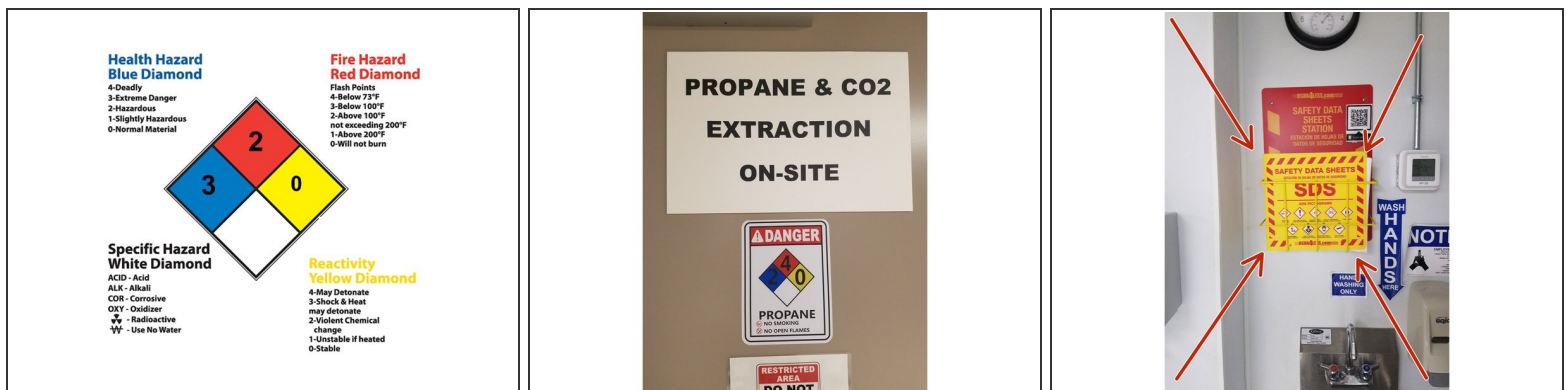
## — Training Employees about Chemical Hazards

Before they start their jobs or are exposed to new hazardous chemicals, employees must attend a hazard communication training that covers the following topics:

- An overview of the requirements in OSHA's Hazard Communication Standard.
- Hazardous chemicals present in their workplace.
- Any operations in their work area where hazardous chemicals are used.
- The location of the written hazard communication plan and where it may be reviewed.
- How to understand and use the information on labels and in Safety Data Sheets.
- Physical and health hazards of the chemicals in their work areas.
- Methods used to detect the presence or release of hazardous chemicals in the work area.
- Steps we have taken to prevent or reduce exposure to these chemicals.
- How employees can protect themselves from exposure to these hazardous chemicals through the use of engineering controls/work practices and personal protective equipment.
- An explanation of any special labeling present in the workplace.
  1. What are pictograms?
  2. What are the signal words?
  3. What are the hazard statements?
  4. What are the precautionary statements?
- Emergency procedures to follow if an employee is exposed to these chemicals.

- Prior to introducing a new chemical hazard into any department, each employee in that department will be given information and training as outlined above for the new chemical hazard.

## — Identifying Hazardous Chemicals




- A Hazard Diamond can be found on the door to all areas that contain hazardous materials.
- A folder located in the nutrient room and outside the LAB/Kitchen area has a physical binder of printed Safety Data Sheets (SDSs) it is also located digitally [here](#) on google drive that identifies all hazardous chemicals with a potential for employee exposure at this workplace.
- Detailed information about the physical, health, and other hazards of each chemical is included in a Safety Data Sheet (SDS); the product identifier for each chemical on the list matches and can be easily cross-referenced with the product identifier on its label and on its Safety Data Sheet.

## — Keeping Safety Data Sheets

<div><div><div><div>SECTION 1: Chemical Product and Company Identification</div><div><div>Manufacturer: Cumberland Swan</div><div>Date: March 2000</div></div><div><div>One Swan Drive</div><div>Smyrna, TN 37167</div></div></div><div><div>Product: Isopropyl Alcohol (IPA)</div><div>50%, 70%, 91% and 99% IPA</div></div><div><div>Telephone: (615) 459-8900</div><div>24hr Emergency: (615) 459-8900 ext. 5270</div></div></div><div><div>SECTION 2: Composition/Information on Ingredients</div><div><div>Name: Isopropanol, IPA, 2-Propanol, Dimethyl Carbinol</div><div>CAS#: 67-63-0</div></div></div><div><div>SECTION 3: Hazards Identification</div><div><div>Colorless, volatile liquid with the odor of rubbing alcohol. Isopropyl Alcohol is a dangerous fire risk. Prolonged exposure to elevated concentrations of vapors may result in irritation of the eyes, nose, and throat and central nervous system (CNS) depression. Prolonged dermal exposure can result in dry, cracking skin.</div><div><div>Potential Routes of Exposure:</div><div>Ingestion, inhalation, dermal contact, eye contact</div></div><div><div>Target Organs:</div><div>Eyes, skin, respiratory system</div></div><div><div>Symptoms of Overexposure:</div><div><div>Inhalation:</div><div>Mild irritation of eyes, nose and throat.</div></div><div><div>Dermal Contact:</div><div>Dry, cracking skin</div></div><div><div>Acute Effects:</div><div>Irritation of skin and/or upper respiratory tract as noted above. Acute CNS depression may be manifested as dizziness, headache, dizziness and/or nausea.</div></div><div><div>Chronic Effects:</div><div>Chronic exposure can result in skin irritation and contact dermatitis. Pre-existing disorders of the skin, eyes, and respiratory tract may be exacerbated by exposure to isopropyl alcohol.</div></div></div></div><div><div>SECTION 3: Hazards Identification</div><div><div>Colorless, volatile liquid with the odor of rubbing alcohol. Isopropyl Alcohol is a dangerous fire risk. Prolonged exposure to elevated concentrations of vapors may result in irritation of the eyes, nose, and throat and central nervous system (CNS) depression. 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Pre-existing disorders of the skin, eyes, and respiratory tract may be exacerbated by exposure to isopropyl alcohol.</div></div></div><div><div>HMIS: H=1, F=3, R=0 See Section 8 for PPE information</div></div><div><div>SECTION 4: First Aid Measures</div><div><div>Eye:</div><div>Flush eyes with copious amount of water for at least 15 minutes</div></div><div><div>Skin:</div><div>Flush with water. If irritation persists, seek medical attention.</div></div><div><div>Ingestion:</div><div>Do not induce vomiting if victim is unconscious or drowsy. Seek medical attention or contact the poison control center.</div></div><div><div>Inhalation:</div><div>Remove victim to fresh air and provided oxygen if breathing is difficult. Seek Medical attention if breathing continues to be difficult.</div></div></div><div><div>Isopropyl Alcohol MSDS</div><div>Page 1 of 3</div></div><div><div>SECTION 5: Fire Fighting Measures</div><div><div>Extinguishing Media:</div><div>Use water fog, alcohol foam, dry chemical or CO2.</div></div><div><div>Unusual Fire or Explosion Hazards:</div><div>Containers exposed to intense heat from fires should be cooled with large amounts of water to prevent buildup of internal pressure due to vapor generation which could result in container rupture.</div></div><div><div>Recommendations:</div><div>Clear area of unprotected personnel. Wear complete turnout gear. Cool containers exposed to fire with water.</div></div></div><div><div>SECTION 6: Accidental Release Measures</div><div><div>Large Spills:</div><div>Eliminate all ignition sources. Equipment must be grounded to prevent sparking. Evacuate the area of unprotected personnel. Contain source of spill. Dike or otherwise confine spilled product. Uncontrolled releases to air, land, or water may be reportable to the National Response Center (1-800-424-8802).</div></div><div><div>Small Spills:</div><div>Take up with absorbent material and place in non-leaking container; seal tightly. Dispose of absorbent (see section 13)</div></div></div><div><div>SECTION 7: Handling and Storage</div><div><div>Storage Requirements:</div><div>Store in tightly closed containers in a cool, dry area away from heat and other possible ignition sources.</div></div><div><div>Handling precautions:</div><div>Use non-sparking tools to open containers. Maintain appropriate class of fire extinguishers nearby in case of fire.</div></div></div><div><div>SECTION 8: Exposure Controls / Personal Protection</div><div><div>OSHA PEL=400ppm</div><div>OSHA STEL=500ppm IDLH=12,000ppm</div><div><div>Recommended Engineering Controls:</div><div>Use explosion-proof ventilation equipment as necessary to maintain airborne concentrations below the PEL. Ground all containers to prevent static sparks during fluid transfers.</div></div><div><div>Recommended Admin Controls:</div><div>Train employees on the hazards of Isopropyl Alcohol</div></div><div><div>PPE:</div><div>Goggles, gloves, NIOSH approved respiratory protection required when</div></div></div></div></div><div data-bbox="69 674 1583 1423" data-label="List-Group"><ul style="list-style-type: none"><li>● The manufacturer or importer of a chemical is required by OSHA to develop a Safety Data Sheet (SDS) that contains specific, detailed information about the chemical's hazard using a specified format. The distributor or supplier of the chemical is required to provide this SDS to the purchaser.</li><li>● SDS's are readily available to all employees during their work shifts. Employees can review SDS for all hazardous chemicals used at this workplace. To access, scan the QR code posted below the SDS signs in the cultivation to access the digital folder containing files for all the SDS sheets for chemicals used in the cultivation.</li><li>● SDS's are readily available to all employees during their work shifts. Employees can review SDS for all hazardous chemicals used at this workplace. To access, scan the QR code posted below the SDS signs in the cultivation to access the digital folder containing files for all the SDS sheets for chemicals used in the cultivation. Also Located <a href="#">here</a></li><li>● As you can see in the example of Isopropyl Alcohol, each section breaks down important information you may need when handling the hazardous material using <b>signal words</b> to tell us the degree of danger and <b>hazard statements</b> to describe the nature of the hazard.</li></ul></div><div data-bbox="35 1982 795 2013" data-label="Page-Footer"><p>This document was generated on 2020-07-30 11:41:01 AM (MST).</p></div><div data-bbox="35 2034 1588 2064" data-label="Page-Footer"><div>© 2020</div><div>Page 4 of 6</div></div></div></div></div>
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## — Hazardous Material Labeling

### Ethanol



**DANGER**

Highly flammable liquid and vapor. Causes serious eye irritation. May cause drowsiness or dizziness.



**PREVENTION**

Keep away from heat, sparks, and open flames. — No smoking. Keep container tightly closed.










Avoid breathing vapors. Use only outdoors or in a well-ventilated area. Wear eye protection.

**RESPONSE**

**If inhaled:** Remove person to fresh air and keep comfortable for breathing. Call a doctor if you feel unwell.

**If in eyes:** Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists: Get medical attention.

**In case of fire:** Use water spray, alcohol-resistant foam, dry chemical or carbon dioxide for extinction.

Health Hazard	Flame	Exclamation Mark
 <ul style="list-style-type: none"> <li>• Carcinogen</li> <li>• Mutagenicity</li> <li>• Reproductive Toxicity</li> <li>• Respiratory Sensitizer</li> <li>• Target Organ Toxicity</li> <li>• Aspiration Toxicity</li> </ul>	 <ul style="list-style-type: none"> <li>• Flammables</li> <li>• Pyrophorics</li> <li>• Self-Heating</li> <li>• Emits Flammable Gas</li> <li>• Self-Reactives</li> <li>• Organic Peroxides</li> </ul>	 <ul style="list-style-type: none"> <li>• Irritant (skin and eye)</li> <li>• Skin Sensitizer</li> <li>• Acute Toxicity (harmful)</li> <li>• Narcotic Effects</li> <li>• Respiratory Tract Irritant</li> <li>• Hazardous to Ozone Layer</li> </ul>
Gas Cylinder	Corrosion	Exploding Bomb
 <ul style="list-style-type: none"> <li>• Gases Under Pressure</li> </ul>	 <ul style="list-style-type: none"> <li>• Skin Corrosion/Burns</li> <li>• Eye Damage</li> <li>• Corrosive to Metals</li> </ul>	 <ul style="list-style-type: none"> <li>• Explosives</li> <li>• Self-Reactives</li> <li>• Organic Peroxides</li> </ul>
Flame Over Circle	Environment	Skull and Crossbones
 <ul style="list-style-type: none"> <li>• Oxidizers</li> </ul>	 <ul style="list-style-type: none"> <li>• Aquatic Toxicity</li> </ul>	

- Hazardous Material will be labeled with signal words & hazard statements as you can see on the example label pictured for Ethanol.
- There are only two words used as **signal words**, “Danger” and “Warning.” Within a specific hazard class, “Danger” is used for the more severe hazards and “Warning” is used for the less severe hazards. There will only be one signal word on the label no matter how many hazards a chemical may have.
- A **hazard statement** is a phrase that describes the nature of the hazard in the substance or mixture. ... Examples of hazard statements include: Causes serious eye damage. Toxic if swallowed. Toxic to the aquatic life with long lasting effects
- Examples of the symbols used can be found on the pictured chart.

## — Informing contractors and other employers about our hazardous chemicals

- If employees of other employer(s) may be exposed to hazardous chemicals at our workplace (for example, employees of a construction contractor working on-site) It is the responsibility of the Director of Operations to provide contractors and their employees with the following information:
  - The identity of the chemicals, how to review our Safety Data Sheets, and an explanation of the container labeling system.
  - Safe work practices to prevent exposure.
- The Director of Operations will also obtain a Safety Data Sheet for any hazardous chemical a contractor brings into the workplace

This written hazard communication plan is available at the following location for review by all employees:

***Operations Office, 10 Industrial Blvd, Turners Falls, MA 01376***





# Chemical Spills

The following are general guidelines to be followed for a chemical spill.

Written By: Hannah Ward



## **INTRODUCTION**

In the event of a chemical spill, the individual(s) who caused the spill is responsible for prompt and proper clean-up. It is also their responsibility to have spill control and personal protective equipment appropriate for the chemicals being handled readily available.

## **RESPONSIBLE EMPLOYEES**

All Employees

## — Conduct the following for chemical spills in the building



- **Prevent the spread of dusts and vapors.** If the substance is volatile or can produce airborne dusts, close the room door and increase ventilation (through fume hoods, exhaust, etc.) to prevent the spread of dusts and vapors to other areas.
- **Control the spread of the liquid.** Contain the spill. Make a dike around the outside edges of the spill. Use absorbent materials such as vermiculite, cat litter, or spill pillows.
- **Absorb the liquid.** Add absorbents to the spill, working from the spill's outer edges toward the center.
- **Collect and contain the cleanup residues.** The absorbent should be scooped, swept, or otherwise placed into a plastic bucket or other container. For dry powders or liquids absorbed to dryness, double bag the residue using plastic bags.
- Additional packaging may be required before the wastes can be transported from the facility. For spills of powders or solid materials, we may need to add a dust suppressant. Be sure to place descriptive labels on each container.

- **Dispose of the wastes.** Keep cleanup materials separate from normal trash. Contact the Director of Operations for guidance in packaging and labeling cleanup residues. Promptly place cleanup wastes in an appropriate hazardous waste receptacle.
- **Decontaminate the area and affected equipment.** Ventilating the spill area may be necessary. For most spills, conventional cleaning products, applied with a mop or sponge, will provide adequate decontamination.

## — FOR HAZARDOUS SPILLS



- **Flammable Liquids** Remove all potential sources of ignition. Vapors are what actually burn, and they tend to accumulate near the ground.
  - Flammable liquids are best removed through the use of spill pillows or pads. Because flammable liquids will probably be incinerated, avoid using inert absorbents such as cat litter. All used absorbent materials should be placed in heavy-duty poly bags, which are then sealed, labeled, and properly dispose .
- ⚠ Before resuming work, make sure the spill area has been adequately ventilated to remove flammable vapors.

- **Volatile Toxic Compounds** Use appropriate absorbent material to control the extent of the spill. Spill pillows or similar absorbent material usually work best because they do not have the dust associated with cat litter, vermiculite, or corn cobs. Place all used absorbent materials in heavy-duty poly bags.
- Seal the bags, label them, and properly dispose. Again, make sure the spill area has been adequately ventilated before resuming work.
- **Direct Contact Hazards** Carefully select suitable personal protective equipment. Make sure all skin surfaces are covered and that the gloves you use protect against the hazards posed by the spilled chemical.
- ☐ Often it is a good idea to wear two sets of gloves: one as the primary barrier, the second as a thin inner liner in the event the primary barrier fails. When the cleanup is completed, be sure to wash hands and other potentially affected skin surfaces.



# Other Hazards & Their Reductions

Hazard Communication Plan

Written By: Hannah Ward





## — Broken Glass

- Broken glass may result in minor to serious lacerations.
- Wear close toed-shoes in the greenhouse/head house. Report broken panes of glass to the greenhouse manager.
- Do not use bare hands to clean up broken glass.

## — Chemical Handling

- Safe handling and usage of chemicals should be conducted in such a manner as to reduce, as completely as possible, the risk of personal exposure to the substances. Persons working with chemicals must be informed about the hazards of working with hazardous chemicals.
- Training should cover techniques of chemical usage, individual chemical hazards, procedures to protect safety and health, and personal protective equipment. In no case may personnel exposure exceed the permissible exposure levels (PEL), the threshold limit values (TLV) or other recognized health standards.
- The Material Safety Data Sheet should be read before using any new chemicals.

## — Chemical Waste Disposal

- Improperly disposed of hazardous materials can adversely affect people and the environment when put into laboratory drains, storm drains and the landfill.

## — Hand and General Power Tools

- Improper use of hand and power tools can cause bodily injuries. Employees using hand or power tools should wear the appropriate personal safety equipment and know how to use the tool correctly.

## — Irrigation, Automatic Installation

- Use of glues, solvents and various tools may cause eye damage and skin irritation.
- Fumes may be toxic and tools may cause cuts and abrasions.
- Use glues and solvents in well-ventilated area. Operate tools with care.
- Wear eye protection and chemical resistant gloves where recommended.

## — Ladders and Step Stools

- Accidents can easily happen by using ladders and step stools improperly for climbing.
- Be aware of correct placement and strength of stool or ladder before climbing.
- Never stand on the top rung/step of a ladder.
- Do not use metal ladders around electric lines.

## — Lifting

- Back injuries typically occur from utilizing improper lifting techniques or lifting items which are too heavy.
- Lifting should be done from a squat position, utilizing strength in the legs.
- Do not bend at the back when lifting.
- When rising up, keep the load close to your body to maximize weight transfer to your legs.
- Use a dolly if possible and/or request assistance if needed.

## — Lock Out/Tag Out



- Malfunctioning equipment/equipment failures or unsafe conditions are in themselves hazardous to those in the area around them.
- Employees finding equipment problems or unsafe conditions should report these to the Director of Operations.
- Managers are responsible for lock out/tag out of their specific equipment.
- Areas and equipment belonging to the department, shared facilities or the building itself, will be posted with an appropriate warning not to enter area or the use of equipment until the problem is resolved by the Director of Operations.

## — Pruning Plants and Budding

- Using clippers, loppers, razor blades, scalpel blades and saws may result in minor or serious lacerations, as well as repetitive motion injury.
- Keep the cutting surface away from all body parts. Avoid cutting towards yourself.

## — Refrigerators

- Lab-safe or explosion-proof refrigerators must be used for flammable chemicals.
- When searching for an item in a refrigerator used for chemical storage, be careful not to inhale vapors that may have built up in the cabinet.
- Refrigerators should be cleaned on a regular schedule, and old chemicals should be properly discarded.

 Food must NEVER be stored in any refrigerator used to store chemicals.

## — Rolling Benches

- Bars under rolling grow benches may pose a smashing or cutting hazard to fingers and hands.
- When rolling tables, ensure that fingers and hands are not under the table.

## — Sharps

- Razor blades, needles, syringes, glass pipettes, and other sharp material must be placed in a specially designed rigid container and not in the trash containers used in the grow.

## — Spills

- Spills of water and non hazardous materials should be cleaned up immediately to prevent slips and falls.
- All areas with hazardous chemicals should have a general spill absorbent on hand.

## — Watering Plants

- Garden hoses, watering wands or loose gravel may lead to slipping, falling or back strain.
  - Keep floors clean and free of excess water and gravel.
  - Pull hose without twisting spine.
  - Where possible coil hoses or push them out of the walk ways to avoid tripping hazard.
  - Excess water on floors can lead to a build up of green algae.
-



Cultivation, Lab & Kitchen

## Certification of Personal Protective Equipment (PPE) Hazard Assessment

Job Task or Process	Estimated Time	Hazard Source	Nature of the Hazard	Body Part at Risk	PPE Selected	Optional or Required
Nutrient Tank Mixing	2 X Week	Chemical Concentrate	Chemical Contact	Eyes and Face	Face Shield	Req
				Body and Legs	PVC Apron	Req
				Feet	PVC Boots	Req
				Hands/Arms	PVC Gauntlet	Req
		Dry Chemicals	Ambient Dust	Respiratory	N95 Respirator	Req
Sweeping	1 X Day	Broom	Ambient Dust	Respiratory	N95 Respirator	Opt
Cleaning Bathroom	1 X Day	Chemical	Caustic Burns	Eyes	Safety Goggles	Req
				Hands	Nitrile Gloves	Req
Cleaning Tools	1 X Day	Solvent:Alcohol	Chemical Absorption	Hands	Nitrile Gloves	Req
Grow Room Work	Multiple Times Daily	Low Hanging Equipment	Overhead Obstruction	Head	EN812 Bump Cap	Opt
		Grow Lights	Light Radiation	Eyes	Light Glasses	Req
Using Power Tools	Occasional	Various Tools	Flying Particulates	Eyes	Safety Glasses	Req
Grinding Plant Waste	1 X Day	Plant Material	Flying Particulates	Eyes	Safety Glasses	Req
			Scratches/Cuts	Hands	Work Gloves	Req
			Ambient Dust	Respiratory	N95 Respirator	Req
General Cleaning	Multiple Times Daily	Cleaning Solutions	Chemical Contact	Hands	Nitrile Gloves	Req
				Eyes	Safety Glasses	Opt
				Respiratory	If mold present, 1/2 face respirator with P100 HEPA filter	Req
Remove/Replace Light Bulbs	As needed	Glass bulb	Potential for Broken Glass	Eyes	Safety Glasses	Req
				Hands	Work Gloves, if broken glass present	Req
Shovel Snow	As needed	Snow/Ice	Slippery Surface	Feet/Body	Slip Resistant Work Shoes/Covers	Req
Spread Ice Melt	As Needed	Snow/Ice	Slippery Surface	Feet/Body	Slip Resistant Work Shoes/Covers	Req
Dump General Waste	1 X Day	Unknown Objects	Object Contact	Hands	Work Gloves	Req
Foliar Spraying	1 X Weekly	Airborne Chemical Mist	Chemical Contact	Hands	Nitrile Gloves	Req
				Eyes	Safety Goggles	Req
				Respiratory	N95 Respirator	Req
Fogging	1 X Month	Airborne Chemical Mist	Chemical Contact	Hands	Nitrile Gloves	Req
				Eyes	Safety Goggles	Req
				Respiratory	N95 Respirator	Req



Work with small volumes (<100 ml) of flammable solvent or material	Occasional	Flammable Solvent	Chemical Contact	Hands Eyes Body	Nitrile Gloves Safety Goggles Lab coat/Scrubs	Req Opt Opt
Work with small volumes (>100 ml) of flammable solvent or material	Occasional	Flammable Solvent	Chemical Contact	Eyes Hands Body Face	Safety Goggles Nitrile Gloves Lab coat/Scrubs Face Shield	Req Req Req Opt
Work with an apparatus with contents under pressure of vacuum	1 X Weekly	Pressurized Apparatus	Physical Injury	Eyes Hands Body Face	Safety Goggles Nitrile Gloves Lab coat/Scrubs Face Shield	Req Req Req Opt
Work with high temperature equipment or objects	Occasional	Hot plates/material	Burns/Fire	Eyes Hands Body Face -	Safety Goggles Nitrile Gloves Lab coat/Scrubs Face Shield *no synthetic clothing*	Req Req Req Opt Req
Minor spill cleanup (cleaned with standard spill kit)	As Needed	Wet Chemicals	Chemical Contact	Eyes Hands Body Face	Safety Goggles Nitrile Gloves Lab coat/Scrubs Face Shield	Req Req Req Opt
Major spill cleanup (too large for spill kit)	As Needed	Wet Chemicals	Chemical Contact	1. If possible, stop or contain the release 2. Evacuate and secure area 3. Assist injured or contaminated persons 4. Call 911 for assistance 5. Call Dir. of Operations		
Wash Glassware	As Needed	Glass	Lacerations/Chemical Splash	Eyes Hands Body Face	Safety Goggles Nitrile Gloves Lab coat/Scrubs Face Shield	Req Req Req Opt
Working with CO2 Extraction Machine	1 x Weekly	Compressor	Loud Noise	Ears	Earplugs or earmuffs	Req

Note: When materials have a potential for becoming airborne, handle under the fume hood.

## **Job Description**

**Job Title:** Chief Operating Officer  
**Salary:**  
**Location:** Corporate Offices of 253, LLC  
**Report to:** CEO

### **About 253 Organic, LLC**

This is an upscale exclusive professional environment with friendly, self-motivated staff. Our main goals are focused on customers and a positive contribution in the community, providing safe access and top-quality cannabis to customers.

### **253 Organic, LLC Mission**

*Our mission is to participate in the creation of healthier lives within the community. To provide services in a fiscally responsible manner which contribute to the physical, psychological, social and spiritual well-being of the customers and community which it serves.*

**NOTE:** All staff members of 253 Organic, LLC, regardless of the level of their responsibilities, are expected to model the mission stated above, provide exceptional customer service, and contribute to the knowledge sharing process.

**Job Summary:** Under the direction of and in conjunction with CEO's, the Chief Operating Officer (COO) position plans, directs and coordinates the operations of the cultivation facility, kitchen and extraction. Some of the responsibilities are formulating policies, managing daily operational activities, and planning use of materials and human resources towards maximum productivity.

### **Responsibilities, under the direction of CEO's:**

- ★ Liaise with superior to make decisions for operational activities and set strategic goals
- ★ Plan and monitor the day-to-day running of business to ensure smooth progress
- ★ Supervise staff from different departments and provide constructive feedback
- ★ Regularly evaluate the efficiency of business procedures according to organizational objectives and apply improvements
- ★ Manage procurement processes and coordinate material and resources allocation
- ★ Oversee customer support processes and organize them to enhance customer satisfaction
- ★ Review financial information and adjust operational budgets to promote profitability
- ★ Revise and/or formulate policies and promote their implementation
- ★ Manage relationship/agreements with external vendors/partners
- ★ Evaluate overall performance by gathering, analyzing and interpreting data and metrics
- ★ Ensure that the company runs with legality and conformity to established regulations

### **Team Development/Leadership:**

1. Promote a culture of high performance and continuous improvement that values learning and a commitment to quality.
2. Ensure staff members receive timely and appropriate training and development.

3. Establish and monitor staff performance and development goals, assign accountabilities, set objectives, establish priorities, conduct annual performance appraisals, and recommend salary adjustments.
4. Mentor and develop staff using a supportive and collaborative approach: assign accountabilities; set objectives; establish priorities; and monitor and evaluate results.

**Operations, under the direction of CEO's:**

1. Upgrade and implement an appropriate system of policies, internal controls, accounting standards, and procedures.
2. Plan, coordinate, and execute the annual budget process.
3. Identify, recommend, and implement changes to improve productivity and reduce cost and scrap, monitor scrap and rework data. Direct the establishment, implementation and maintenance of production standards.
4. Direct and coordinate various programs essential to manufacturing procedures (e.g., training, safety, housekeeping, cost reduction, worker involvement, security, etc.).
5. Initiate and coordinate major projects, (e.g., plant layout changes, installation of capital equipment, major repairs, etc.).
6. Work effectively and relate well with others. Exhibit a professional manner in dealing with others, working to maintain constructive working relationships.
7. Keep current on information and technology affecting functional areas to increase innovation and ensure compliance.
8. Perform miscellaneous duties and projects as assigned and required.
9. Work with the extraction team to assure quality standards are met and production levels are fulfilled.
10. Maintain the testing protocol standards on all products to assure quality consistency with MJ product lines.
11. Work with the kitchen, cultivation, and extraction managers to assure quality standards and production quotas are being met. Make recommendations to the CEO as needed.

**Desired Qualifications:**

1. Business degree recommended
2. Minimum 5 years' experience in a senior management role.
3. Proven track record of success facilitating progressive organizational change and development within a growing organization.
4. Excellent judgement and creative problem-solving skills including negotiation and conflict resolution skills.
5. Strong mentoring, coaching experience to a team with diverse levels of expertise.
6. Entrepreneurial team player with multi-tasking skills.
7. Superior management skills: ability to influence and engage direct and indirect reports and peers.
8. Self-reliant, good problem solver, and results oriented.
9. Energetic, flexible, collaborative, and proactive; a team leader who can positively and productively impact both strategic and tactical finance and administration initiatives.
10. Exceptional written, oral, interpersonal, and presentation skills and the ability to effectively interface with senior management, 253's CEO, and staff.
11. Ability to operate as an effective tactical and strategic thinker.

**Additional Duties:**

This job description in no way states or implies that these are the only duties to be performed. You will be expected to follow any other job-related instructions and to perform other job-related duties as requested by your supervisor.

Employment is at-will and terminable by employer or employee at any time, with or without cause, and with or without prior notice. Nothing in this job description shall be read or deemed to create a contract between employer and employee. This job description is for informational purposes only and can be modified by the employer at any time, with or without prior notice.

## **Job Description**

**Job Title:** Accounting and Human Resources Manager / CFO

**Salary:**

**Location:** 253 Millers Falls Road

**Report To:** Seth Rutherford, Christopher Gallant

**About 253 Organic:** This is a professional environment with a friendly, self-motivated staff. Our primary goals focus on customers and a positive contribution in the community by providing safe access to top quality cannabis.

Note: All employees of 253 Organic, regardless of the level of their responsibilities, are expected to model the mission stated above, provide exceptional customer service, and contribute to the knowledge sharing process.

**Job Summary:** The Manager of Accounting and Human Resources / CFO is responsible for monitoring the fiscal health of the company and reporting back to the CEO's, and members. Despite the title, this position does not hold any independent authority or control over the operations of 253 Organic. Although this person acts in an advisory capacity to the CEO's in terms of gathering and relaying information, this position does not hold influence over management, operations, or finances of 253 Organic.

This person is responsible for the accounting staff that does day to day Quickbooks entries, as well as inventory management and purchasing of supplies. This person is also responsible for HR staff that onboards all new employees and tracks benefits and anniversaries. This person maintains the confidential records of our employees. This person is also responsible for appropriate Document Retention procedures pertaining to financial and employee records. This person is also responsible for assisting with all licensing procedures.

### **Job Description:**

- ✚ Maintenance of financial records, including working closely with CPA firm to maximize outcomes pertaining to 280E
- ✚ Reporting as requested from CEO's and members
- ✚ In conjunction with compliance officer, maintain SOP's and Job Descriptions pertaining to Financial, Employee, and Inventory activities
- ✚ Bi-Weekly payroll
- ✚ Supervise the entry of all QuickBooks data for operations, including daily sales, deposits, invoices, debit card charges, and internal transfers of product and supplies between licenses.
- ✚ Supervise the reconciliation of bank accounts and monitor balances. Make transfers as necessary to cover expenditures
- ✚ Pay bills weekly with reporting to CEO's and members
- ✚ Supervise onboarding of all new employees including CORI, Agent Cards with CCC, NHR with MA, METRC with appropriate permissions. Enter all employee info into DataPay
- ✚ Maintain Massachusetts State Notary Public and notarize all documents as requested
- ✚ Supervise cash counting, bank deposits, coordination of courier transports, making change orders, and reporting to the bank
- ✚ Research and stay up to date on guidance changes by State of MA, Cannabis Control Commission, METRC, Labor Boards
- ✚ Interface with Accountants, Auditors, and Legal Counsel as necessary under the guidance of CEO's.
- ✚ Protect the Asset – All aspects of this position stem from the objective of protecting two primary company assets, cash and employees.

### **Requirements:**

- ✚ Ethics beyond reproach
- ✚ Must be 21 or over
- ✚ Preference to have Bachelor degree in Accounting or Business Administration, or equivalent work experience
- ✚ Proficiency in QuickBooks
- ✚ Outstanding work ethic and communication skills, positive and cheerful attitude
- ✚ Must be reliable, honest, responsible, and willing to do whatever is necessary to keep the company operating at a very high level

- ✚ Strong attention for detail
- ✚ Experience in cash handling
- ✚ Knowledge and understanding of Marijuana, Massachusetts Marijuana laws, and federal 280E Tax laws
- ✚ All employees must undergo a multi-state, multi-dimensional background check. (*Note that any applicant with a felony or drug-related diversion offense is not eligible to become a Registered Agent*)
- ✚ All employees must be a Registered Agent with the Commonwealth of Massachusetts Cannabis Control Commission.





# Energy Use

Written By: Hannah Ward

## **INTRODUCTION MANAGEMENT SOP RESPONSIBLE EMPLOYEES**

All Employees

## — Energy Use Reduction

- LED light fixtures are installed throughout the grow, which typically produce more lumens per watt than fluorescent light fixtures.
- Natural lighting via skylights illuminates the trim room.
- All rooms in the facility have spray insulation- not just the outside walls. This greatly reduces our HVAC energy use (both electrical and gas).

## — Renewable Energy

- We have opted not to install on-site renewable energy systems on the premises. Initial and ongoing maintenance costs were deemed too high, though may be something we pursue in the future. Solar may be an option, though wind is an impossibility as we neighbor an airport.
- In lieu of not installing on-site renewable energy, we are purchasing wind power via Constellation Energy Resources

## — Strategies to reduce electric demand

- We try to purchase Energy Star rated electronic devices for use in the cultivation.

## — Engagement with energy efficiency programs

- MassSave will be our main resource to find new appliances, equipment, electronics, lighting and for our recycling needs.



# ETS

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THIS CERTIFICATE IS AWARDED TO THE FOLLOWING EXTRACTION EQUIPMENT TECHNICIAN,

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MEP-HCU/C

### BASIC SAFETY OPERATION & MAINTENANCE

## MEPRO

MODULAR EXTRACTION PLATFORM

THIS CERTIFICATE SATISFIES MINIMUM REQUIREMENTS FOR

COLORADO STATE MEDICAL & RECREATIONAL INFUSED

PRODUCT MANUFACTURING IN 'UNCLASSIFIED

HAZARDOUS LOCATIONS' USING THE ETS

CERTIFIED EXTRACTION SYSTEM.

MEPHCUC-BAOP

TRAINING COURSE ID #

**01/22/2020**

DATE OF TRAINING



*Noah Guillory*

INSTRUCTOR SIGNATURE

ETS08NG

INSTRUCTOR ID #

CERTIFICATE # **573**

THIS CERTIFICATE EXPIRES 2 YEARS FROM THE ISSUE DATE.  
RENEWAL CERTIFICATION REQUIRES COMPLETION OF  
ADDITIONAL TRAINING COURSES & QUIZES.



# ETS

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## JOURDAN ORTEGA

TO RECOGNIZE SUCCESSFUL COMPLETION OF THE FOLLOWING TRAINING COURSE:

### MEP-HCU/C

### BASIC SAFETY OPERATION & MAINTENANCE

MEPHCUC-BAOP

TRAINING COURSE ID #

**01/22/2020**

DATE OF TRAINING



## THE MePRO

MODULAR EXTRACTION PLATFORM

THIS CERTIFICATE SATISFIES MINIMUM REQUIREMENTS FOR COLORADO STATE MEDICAL & RECREATIONAL INFUSED

PRODUCT MANUFACTURING IN 'UNCLASSIFIED

HAZARDOUS LOCATIONS' USING THE ETS

CERTIFIED EXTRACTION SYSTEM.

THIS CERTIFICATE EXPIRES 2 YEARS FROM THE ISSUE DATE.  
RENEWAL CERTIFICATION REQUIRES COMPLETION OF  
ADDITIONAL TRAINING COURSES & QUIZES.

*Noah Guillory*

INSTRUCTOR SIGNATURE

ETS08NG

INSTRUCTOR ID #

CERTIFICATE # **572**



# ETS

EXTRACTIONTEK SOLUTIONS<sup>®</sup>

THIS CERTIFICATE IS AWARDED TO THE FOLLOWING EXTRACTION EQUIPMENT TECHNICIAN,

CHRISTOPHER GALLANT

TO RECOGNIZE SUCCESSFUL COMPLETION OF THE FOLLOWING TRAINING COURSE:

MEP-HCU/C

BASIC SAFETY OPERATION & MAINTENANCE

MEPHCUC-BAOP

TRAINING COURSE ID #

**01/22/2020**

DATE OF TRAINING



**THE MePOT**

MODULAR EXTRACTION PLATFORM

THIS CERTIFICATE SATISFIES MINIMUM REQUIREMENTS FOR  
COLORADO STATE MEDICAL & RECREATIONAL INFUSED

PRODUCT MANUFACTURING IN 'UNCLASSIFIED  
HAZARDOUS LOCATIONS' USING THE ETS

CERTIFIED EXTRACTION SYSTEM.

THIS CERTIFICATE EXPIRES 2 YEARS FROM THE ISSUE DATE.  
RENEWAL CERTIFICATION REQUIRES COMPLETION OF  
ADDITIONAL TRAINING COURSES & QUIZES.

*Noah Guillory*

INSTRUCTOR SIGNATURE

ETS08NG

INSTRUCTOR ID #

CERTIFICATE # **571**



# ETS

EXTRACTIONTEK SOLUTIONS!

THIS CERTIFICATE IS AWARDED TO THE FOLLOWING EXTRACTION EQUIPMENT TECHNICIAN,

## JOHN HENDERSON

TO RECOGNIZE SUCCESSFUL COMPLETION OF THE FOLLOWING TRAINING COURSE:

### MEP-HCU/C

## BASIC SAFETY OPERATION & MAINTENANCE

MEPHCUC-BAOP

TRAINING COURSE ID #

**01/22/2020**

DATE OF TRAINING



## THE MePRO

MODULAR EXTRACTION PLATFORM

THIS CERTIFICATE SATISFIES MINIMUM REQUIREMENTS FOR  
COLORADO STATE MEDICAL & RECREATIONAL INFUSED

PRODUCT MANUFACTURING IN 'UNCLASSIFIED

HAZARDOUS LOCATIONS' USING THE ETS

CERTIFIED EXTRACTION SYSTEM.

THIS CERTIFICATE EXPIRES 2 YEARS FROM THE ISSUE DATE.  
RENEWAL CERTIFICATION REQUIRES COMPLETION OF  
ADDITIONAL TRAINING COURSES & QUIZES.

*Noah Guillory*

INSTRUCTOR SIGNATURE

ETS08NG

INSTRUCTOR ID #

CERTIFICATE # **574**



253 ORGANIC, LLC

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EMPLOYEE HANDBOOK

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Updated August 4, 2020

253 ORGANIC, LLC  
EMPLOYEE HANDBOOK

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## **WELCOME TO 253 ORGANIC, LLC**

253 Organic, LLC (the “Company”) is providing this handbook to give you an overview of the Company’s policies, benefits, and rules. This handbook contains important information about the Company and about your employment with the Company. Please understand that this handbook only provides general information about the policies, benefits, and regulations governing the employees of the Company and is not a legal document. It is also not intended to be an express or implied contract. The guidelines presented in this handbook are not intended to replace sound management, judgment, and discretion.

This handbook does not create an employment agreement and employees are regarded as employees-at-will (as described more fully herein).

It is impossible to anticipate every situation that may arise in the workplace or to provide information that answers every possible question. The Company, as a result, may be required to interpret portions of this handbook or deviate from its express provisions. In addition, circumstances will undoubtedly require that policies, practices, and benefits described in this handbook change from time to time. As a result, the Company reserves the right to modify, supplement, rescind, or revise any provision of this handbook from time to time as it deems necessary or appropriate in its sole discretion, with or without notice to you.

All of us must work together to make the Company a viable, healthy, and profitable organization. This is the only way we can provide a satisfactory working environment that promotes genuine concern and respect for others including all employees and our customers. If any statements in this handbook are not clear to you, please contact HR.

## **COMPANY PHILOSOPHY**

### **OPEN-DOOR POLICY**

Open communications and the flow of information are important to the Company. The Company communicates with its employees through notices and meetings. These communications are intended to keep you up-to-date and informed.

In keeping with the Company’s philosophy of open communication, all employees have the right and are encouraged to speak freely with management about their job-related concerns.

We urge you to go directly to management to discuss your job-related ideas, recommendations, concerns and other issues which are important to you. If, after talking

with management, you feel the need for additional discussion, you are encouraged to speak with the COO or HR. No retaliation or adverse action may be taken against an employee following this policy in good faith.

The most important relationship you will develop at the Company will be between you and your co-workers. However, should you need support from someone other than a co-worker, management is committed to resolving your individual concerns in a timely and appropriate manner.

### **EQUAL EMPLOYMENT OPPORTUNITY**

It is the Company's policy to provide equal employment opportunity to all employees and applicants for employment and not to discriminate on any basis prohibited by law, including race, color, gender, age, religion, national origin, ethnicity, disability, marital status, veteran status, transgender, sexual orientation, genetic information or any other basis prohibited by law. It is our intent and desire that equal employment opportunities will be provided in employment, recruitment, selection, compensation, benefits, promotion, demotion, layoff, termination and all other terms and conditions of employment. The COO and all managerial personnel are committed to this policy and its enforcement.

If you are disabled and need a reasonable accommodation in order to perform the essential functions of your job, you may request an accommodation. The Company will make every effort to provide a reasonable accommodation for your known disability (if you are a qualified individual) so that you can perform the essential functions of your job when you can do so without direct threat to yourself or others.

Employees are directed to bring any violation of this policy to the immediate attention of HR or the COO. Any employee who violates this policy or knowingly retaliates against an employee reporting or complaining of a violation of this policy shall be subject to immediate disciplinary action, up to and including termination of employment. Complaints brought under this policy will be promptly investigated and handled with due regard for the privacy and respect of all involved.

### **HARASSMENT POLICY**

The Company will not tolerate harassment or intimidation of our employees on any basis prohibited by law, including race, color, gender or sexual orientation, age, ancestry, religion, national origin, ethnicity, handicap, disability, marital status, active military or veteran status, or genetic information. It is the Company's policy that any harassment, including acts creating a hostile work environment or any other discriminatory acts directed against our employees, will result in discipline, up to and including termination of employment. The Company also will not tolerate any such harassment of our employees by our customers, vendors or others whom our employees come into contact within our workplace.

Employees must bring any violation of this policy to the immediate attention of any of the 253 Officers (CEO, CFO, COO). The Company will thoroughly investigate all claims of harassment taking into consideration the privacy of the individuals involved. Any employee who knowingly retaliates against an employee who has reported workplace harassment or discrimination shall be subject to immediate disciplinary action, up to and including termination of employment.

## **SEXUAL HARASSMENT POLICY**

### *Introduction*

It is the Company's goal to promote a workplace free of sexual harassment. Sexual harassment of employees occurring in the workplace or in other settings in which employees may find themselves in connection with their employment is unlawful and will not be tolerated by the Company.

Employees are encouraged to bring concerns about sexual harassment to the attention of the Company. Any retaliation against an individual who has complained about sexual harassment or retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is also unlawful and will not be tolerated. To achieve our goal of providing a workplace free from sexual harassment, the conduct that is described in this policy will not be tolerated and we have created a procedure to handle concerns of inappropriate conduct.

Because the Company takes allegations of sexual harassment seriously, we will respond promptly to complaints of sexual harassment and where it is determined that such inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate.

Please note that while this policy sets forth our goals of promoting a workplace that is free of sexual harassment, the policy is not designed or intended to limit our authority to discipline or take remedial action for workplace conduct which we deem unacceptable, regardless of whether that conduct satisfies the definition of sexual harassment.

### *Definition of Sexual Harassment*

"Sexual harassment" means sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature when:

- i. Submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly as a term or condition of employment or as a basis for employment decisions; or,
- ii. Such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual's work performance by



creating an intimidating, hostile, humiliating or sexually offensive work environment.

Under these definitions, direct or implied requests by a co-worker for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment constitutes sexual harassment.

The legal definition of sexual harassment is broad and in addition to the above examples, other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a workplace environment that is hostile, offensive, intimidating, or humiliating to male or female workers may also constitute sexual harassment.

While it is not possible to list all those additional circumstances that may constitute sexual harassment, the following are some examples of conduct which if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances including the severity of the conduct and its pervasiveness:

- i. Unwelcome sexual advances – whether they involve physical touching or not;
- ii. Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life; comment on an individual's body, comment about an individual's sexual activity, deficiencies, or prowess;
- iii. Display of sexually suggestive objects, pictures, screensavers, cartoons, or videos;
- iv. Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments;
- v. Inquiries into one's sexual experiences;
- vi. Discussion of one's sexual activities;
- vii. Sending sexually oriented or sex-based emails or text messages;
- viii. The use of the computer to disseminate sexually oriented or sex-based communications; and
- ix. Access of sexually explicit internet websites.

All employees should take special note that, as stated above, retaliation against an individual who has complained about sexual harassment, and retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is unlawful and will not be tolerated by this Company.

#### *Complaints of Sexual Harassment*

If any of our employees believes that he or she has been subjected to sexual harassment, the employee has the right to file a complaint with HR. This may be done in writing or orally.

If you would like to file a complaint you may do so by contacting either of the following individuals:

John Snyder  
COO  
253 Millers Falls Road  
Turners Falls, MA 01376  
Tel. 716-796-4679

Bambi Rawlings-Chamberlin  
Human Resources Manager  
253 Millers Falls Road  
Turners Falls, MA 01376  
Tel. 413-863-5704

They are also available to discuss any concerns you may have and to provide information to you about our policy on sexual harassment and our complaint process.

### *Sexual Harassment Investigation*

We will promptly investigate the allegation in a fair and expeditious manner. Furthermore, we will make every effort to maintain confidentiality under the circumstances. Our investigation will include a private interview with the person filing the complaint and with witnesses. We will also interview the person alleged to have committed sexual harassment. When we have completed our investigation, we will, to the extent appropriate inform the person filing the complaint and the person alleged to have committed the conduct of the results of that investigation.

If it is determined that inappropriate conduct has occurred, we will act promptly to eliminate the offending conduct, and where it is appropriate, we will also impose disciplinary action.

### *Disciplinary Action*

If it is determined that inappropriate conduct has been committed by one of our employees, we will take such action as is appropriate under the circumstances. Such action may range from counseling to termination from employment, and may include such other forms of disciplinary action as we deem appropriate under the circumstances.

### *State and Federal Remedies*

In addition to the above, if you believe you have been subjected to sexual harassment or any other form of discrimination, you may file a formal complaint with either or both the federal or applicable state agencies set forth below. Using our complaint process does not prohibit you from filing a complaint with these agencies. Each of the agencies listed below has a short time period for filing a claim with the agency (EEOC - 300 days; MCAD - 300 days;). There may be other time periods for filing claims in court.

- i. The U.S. Equal Employment Opportunity Commission (“EEOC”)  
1 Congress Street, 10<sup>th</sup> Floor

Boston, MA 02114  
617-565-3200  
<http://www.eeoc.gov/boston/index.html>

- ii. Massachusetts Commission Against Discrimination (“MCAD”)  
One Ashburton Place  
Boston, MA 02108  
617-727-3990  
<http://www.mass.gov/mcad/>

## **WORKING AND COMPENSATION**

### **EMPLOYMENT ON AN AT-WILL BASIS**

All employees of the Company, regardless of their classification or position, are employed on an at-will basis. This means that each employee’s employment can be terminated at the will of the employee or the Company at any time, with or without cause and with or without notice. Any officer, agent, representative, or employee of the Company, except in writing and signed by the COO, does not have the authority to enter into any agreement with any employee or applicant for employment on other than on an at-will basis. Furthermore, nothing contained in the policies, procedures, handbooks, manuals, job descriptions, applications for employment, or any other document of the Company shall in any way create an express or implied contract of employment or an employment relationship on other than an at-will basis.

### **ATTENDANCE AND REPORTING TO WORK**

Each employee is important to the overall success of our operation. When you are not here, someone else must do your job. Consequently, you are expected to report to work on time at the start of your scheduled shift. Reporting to work on time means that you are ready to start work, not just arriving at work, at your scheduled starting time.

The Company depends on its employees to be at work at the times and locations scheduled. Excessive absenteeism and/or tardiness will lead to disciplinary action, up to and including termination of employment. The determination of excessive absenteeism will be made at the discretion of the Company. Absence from work for three consecutive days without properly notifying your Direct Supervisor will be considered a voluntary resignation. After two days’ absence, you may be required to provide documentation from your doctor or clinic to support an injury- or illness-related absence, and to ensure that you may safely return to work.

If you expect to be absent from the job for an approved reason (*e.g.*, paid time off or a leave of absence), you should notify your Direct Supervisor of your upcoming absence as far in advance as possible. If you unexpectedly need to be absent from or late to work, you must notify your Direct Supervisor at least 30 minutes prior to the start of

your scheduled shift/workday that you will be late or absent and provide the reason for that absence or lateness. If your Direct Supervisor is not available, you should contact the Human Resources Manager or leave a voice message for your Direct Supervisor prior to the start of your scheduled shift/workday. Be sure to leave your telephone number so your Direct Supervisor can return your call. Failure to properly contact the Company will result in an unexcused absence for disciplinary purposes. Your attendance record is a part of your overall performance rating. Your attendance may be included during your review and may be considered for other disciplinary action up to and including termination of employment.

Whenever possible, medical and dental appointments should be scheduled around your assigned work hours; otherwise, they may be considered absences without pay. If you are unable to schedule an appointment before or after your regularly scheduled workday, you are required to talk to your Direct Supervisor to make special arrangements.

Furthermore, if you leave work early or for a period of time during the day, you must notify your Direct Supervisor when you leave and when you expect to return. For example, you should notify your Direct Supervisor if you need to leave during your lunch break to run an errand.

### **WORKDAY HOURS AND SCHEDULING**

The regularly scheduled workday is established by the employee's Manager when you are hired. Your schedule is subject to change based on business needs. Whenever possible, the Company will try to give you one week advance notice of a change in your schedule, but based on business needs, the Company may not be able to give advance notice.

In case of unplanned conditions, such as bad weather, that may force a schedule change at the last minute, you should contact your Manager.

The Company generally schedules meal periods and rest periods during the workday. Rest periods are 15-minute paid breaks. For meals, our policy is:

- i. Meal periods will be no less than a 1/2 hour.
- ii. The meal period is unpaid.
- iii. All employees are required to take a lunch break and no employee is authorized, without prior approval, to perform work during the lunch period.
- iv. The employee must spend the meal period away from his/her work station.
- v. An employee may spend the meal period at his/her assigned work station only if he/she is working during the meal period and overtime hours have been approved.

## **RECORDING HOURS WORKED**

All employees are required to record their time. The Company will provide you with a time card for reporting your hours. Only you are authorized to record your own time.

Unless specifically authorized by the Company and only if work must be performed, employees may not start recording time before their regularly scheduled starting time or after their regularly scheduled quitting time.

Any time missed, not to exceed 40 hours, during the week may be made up during the same workweek with the supervisor's approval.

Employees must correctly record their hours for each working day. Completed time cards must be given to the Human Resources Manager no later than 10:00 a.m. every Monday after the end of a pay period. If the last day of the pay period is a holiday, time cards are due on the Tuesday after the end of the pay period. Supervisors are responsible to ensure that the time reported by employees is accurate.

Failure to turn in time cards by the applicable deadline may delay your paycheck.

Falsification of time reporting or actual time worked may result in disciplinary action, up to and including termination of employment.

## **PAY PERIOD AND PAYDAY**

The Company issues paychecks every other Friday. Pay periods start on Monday morning and end two weeks later on Sunday evening. On the Friday after the last day of each pay period, you will receive a paycheck for all hours worked during that pay period. If you use direct deposit, your pay will generally be available for withdrawal from your bank account on the pay date.

## **HOLIDAYS**

The Company observes the following holidays:

- i. New Year's Day
- ii. Thanksgiving
- iii. Christmas

Full-time employees, including those in their 90-day probationary period, will be paid for these holidays as long as they are present for work on the workdays immediately before and after that holiday, or have an acceptable reason for being absent on any such days. If a paid holiday falls within an employee's vacation period, the holiday will not be counted as a vacation day.

Part-time, temporary and seasonal employees are not eligible for holiday pay.

The Company will be open the following holidays:

- i. Labor Day
- ii. Memorial Day
- iii. Independence Day
- iv. Columbus Day after 1:00 pm
- v. Veterans Day after 1:00 pm

Hourly employees in all departments will be paid a premium rate of 1.5 x their hourly rate when working these days.

### **EMPLOYMENT CLASSIFICATIONS**

Upon being hired by the Company, all new employees must serve a ninety (90) calendar day introductory period. It is especially important that you make the Human Resources Manager aware of any questions or problems you may encounter during this period. Your performance will be carefully monitored during this period. Satisfactory completion of the introductory period does not entitle you to employment for any specific term.

For the sole purpose of determining the allowance of certain employee benefits, employees are classified as:

- i. Regular Full-Time Employees - An employee who is scheduled to work an average of forty (40) hours per week on a regular and continuous basis.
- ii. Regular Part-Time Employees - An employee who is usually scheduled to work less than an average of forty (40) hours per week on a regular and continuous basis. Regular part-time employees are not eligible for participation in those employee benefits programs made available for regular full-time employees.
- iii. Temporary or Seasonal Employees - An employee whose services are anticipated to be of limited duration falls into this classification. Temporary and seasonal employees are not eligible for participation in those employee benefits programs made available for regular full-time employees.

For payroll purposes, employees will be classified as one of the following:

- i. Exempt Employees - Certain employees such as executive and professional employees are paid on a salary basis for all hours worked each week. These employees are expected to work whatever hours are required to accomplish their duties, even if it exceeds their normal workweek. No overtime premium pay will be paid to exempt employees in most circumstances.



- ii. Non-Exempt Employees - All employees who are not identified as exempt employees are considered non-exempt employees. Non-exempt employees are eligible for payment of overtime premium pay.

### **OVERTIME**

Occasionally it may be necessary for an hourly employee to work beyond his or her normal workday hours. Overtime pay is paid only when work is scheduled, approved, and made known to the hourly employee in advance by a supervisor. The supervisor must obtain approval from the COO before requesting an hourly employee to work overtime. Under no circumstances may hourly employees work overtime without such prior approval.

Hourly employees will receive overtime pay at a rate of one-and-one-half times their regular hourly rate for all hours worked in excess of 40 in a workweek. Hours cannot be accrued, banked, or averaged from one week to another. Also, in no case, may hourly employees take compensatory time off in a following week in lieu of overtime pay.

To the extent possible, overtime will be distributed equally among all hourly employees in the same classification and position, provided that the hourly employees concerned are equally capable of performing the available work. Decisions regarding overtime work will be made by the appropriate supervisor.

Supervisors must provide an hourly employee with as much advance notice as possible when overtime is required so that the hourly employee can rearrange his/her schedule to work the requested time. Less than two hours is generally not considered adequate advance notice.

If overtime has not been authorized by the COO, supervisors may not ask hourly employees to work beyond their regularly scheduled hours or cut their meal period short. Demands on hourly employees to work when overtime has not been authorized violates the Fair Labor Standards Act.

### **MAINTAINING YOUR PERSONNEL RECORDS**

It is your responsibility to provide current information regarding your address, telephone number, emergency contact information, insurance beneficiaries, change in dependents, marital status, etc. Please notify the Human Resources Manager of any changes in your address, phone number, emergency contact information, marital status, number of dependents, etc. Changes in exemptions for tax purposes will only be made upon the receipt of a completed W-4 form.

## **PERSONNEL FILES**

Your personnel file is the property of the Company, and does not belong to you. However, upon request, you may review your personnel file in the presence of Human Resources provided you give the Company reasonable advance notice. You may also request a copy of any item(s) in your personnel file, and if you disagree with an item in your file, you may respond to that item in writing. A reasonable fee may be charged for copies. You may not remove anything from your personnel file.

## **JOB DESCRIPTIONS**

The Company makes every effort to create and maintain accurate job descriptions for all positions within the organization. Each description includes a job information section, a job summary section (giving a general overview of the job's purpose), an essential duties and responsibilities section, a supervisory responsibilities section, a qualifications section (including education and/or experience, language skills, mathematical skills, reasoning ability, and any certification required), a physical demands section, and a work environment section.

The Company maintains job descriptions to aid in orienting new employees to their jobs, identifying the requirements of each position, establishing hiring criteria, setting standards for employee performance evaluations, and establishing a basis for making reasonable accommodations for individuals with disabilities.

The Company will prepare job descriptions when new positions are created. Existing job descriptions are also reviewed and revised in order to ensure that they are up to date. Job descriptions may also be rewritten periodically to reflect any changes in the position's duties and responsibilities. All employees will be expected to help ensure that their job descriptions are accurate and current, reflecting the work being done.

Employees should remember that job descriptions do not necessarily cover every task or duty that might be assigned, and that additional responsibilities may be assigned as necessary. Contact the COO or HR if you have any questions or concerns about your job description.

## **PERFORMANCE EVALUATIONS**

Employees may have their job performance reviewed after the first 90 days of employment and on an annual basis by the Company. The Company may conduct evaluations more frequently as deemed necessary and appropriate by management.

## **TERMINATION OF EMPLOYMENT**

Employees are responsible for all Company property, materials or written information issued to them or in their possession or control. Employees must return all such information immediately upon termination of employment.

## **REFERENCES/EMPLOYMENT VERIFICATION**

Any requests for personnel information or references should be directed to the Human Resources Manager. Unless the Company receives a written request from an employee authorizing the Company to provide a reference, it is the Company's policy to confirm only dates of employment and position held in response to a request for a reference on a present or former Company employee. Exceptions to this policy only may be made by the COO.

The Company strongly discourages you from providing a "personal reference" on behalf of any employee, former employee or non-Company employee. Personal references may not be written on Company letterhead. Any personal references that you provide must include a statement that you are acting in an individual capacity, and not on behalf of the Company.

## **EMPLOYEE ELIGIBILITY VERIFICATION (I-9)**

All employers are required by the Immigration and Reform Control Act of 1986 to verify that all employees hired after November 1986 are authorized to work in the United States. This means that new employees must present documentation that establishes their United States citizenship, permanent resident status, or work authorization for non-immigrant aliens.

After an offer of employment is made and prior to beginning work, employees must complete an Employee Eligibility Verification, Form I-9, and present appropriate verification documentation. All offers of employment, and continued employment of persons whose employment authorization is of limited duration, are conditioned upon such employee's establishing his/her work authorization.

## **REGISTERED AGENT IDENTIFICATION CARD**

An application for a registered agent identification card will be filed with the Commonwealth for each candidate offered a position of employment with the Company. The application will, as required, provide the following information:

- i. Candidate's full name, address, date of birth;
- ii. All aliases used previously or currently including maiden names;
- iii. A copy of the candidate's driver's license or other government-issued ID;
- iv. Attestation that the individual will not engage in the diversion of marijuana products;
- v. Written acknowledgement by the candidate of any limitations on his/her authorization to cultivate, harvest, prepare, package, possess, transport and dispense marijuana in the Commonwealth;
- vi. Background information including the following:

- a. Description and dates of any criminal action that occurred in any jurisdiction which resulted in a conviction, guilty plea, plea of nolo contendere, or admission of sufficient facts;
- b. Description and dates of any civil or administrative action that occurred in any jurisdiction relating to any professional, occupational or fraudulent practices;
- c. Description and dates of any past or pending action on a license that occurred or is occurring in any jurisdiction; and
- d. Description and dates of any past or pending disciplinary action or unresolved complaint that occurred or is occurring in any jurisdiction.

### **CRIMINAL OFFENDER RECORD INFORMATION (CORI) REPORT**

The Company is required to obtain a Criminal Offender Record Information (“CORI”) report for each employee within 30 days prior to the submission of his/her application for a registered agent identification card.

This information will be used to fill out the background check information for criminal actions for each application for a registered agent identification card.

CORI reports will be stored securely and kept confidential. They will, however, be subject to review by the Commission investigators on request.

CORI reports are only valid for one year from the date they are generated. New CORI reports must be obtained, for all employees prior to the one-year anniversary of the last report that was generated.

### **BACKGROUND CHECKS**

In order to obtain a required registered agent identification card, the Company will conduct background checks on all candidates offered positions of employment. The Company may also conduct a background check on any current employee if the Company has cause to believe that a background check is warranted.

Background checks will be conducted in compliance with federal and state law by a reputable third party consumer reporting agency. Information obtained through a background check will be kept separate from the employee’s regular personnel file and will be maintained in strict confidence.

The background check generally will include a review of information from an individual’s previous employer(s), educational institutions, law enforcement agencies at the federal, state and county levels; and in some cases credit reporting agencies. Background checks may include but are not limited to the following:

- i. Review of criminal records,
- ii. Verification of social security number,

- iii. Verification of educational records,
- iv. Verification of employment records, and
- v. Sexual offender registry search.

For new hires, background checks ordinarily will be processed at the time a conditional offer of employment is made.

In each case in which a background check will be performed, the individual will be asked to complete and sign a release authorizing the third-party vendor to conduct the background check. If the individual fails to sign the release, any offer for employment will be rescinded, and any current employment with the Company may be terminated.

Background check reports will be obtained and reviewed by Human Resources, who may review the information with the appropriate member of senior staff, the Company's legal counsel, or others with a need to know.

If an individual is denied employment due, wholly or in part, to information obtained in a background check, he/she will be so informed in advance of any adverse action. In addition, where required by law and to the extent applicable, the individual will be given (a) a copy of the relevant background check report, (b) a summary of the individual's legal rights concerning the background check report, and (c) the name, address and phone number of the third-party vendor if the individual has questions about the results of the report or wants to dispute the accuracy of the report. It is important to note, however, that the vendor does not make employment decisions and will be unable to provide any individual with specific reasons as to why the adverse action was taken.

## **STANDARDS AND EXPECTATIONS FOR THE WORKPLACE**

### **SAFETY**

The Company believes in maintaining safe and healthy working conditions for our employees. However, to achieve our goal of providing a safe workplace, each employee must be safety conscious. We have established the following policies and procedures that allow us to provide safe and healthy working conditions. We expect each employee to follow these policies and procedures, to act safely, and to report unsafe conditions to the COO in a timely manner.

The Company provides information to employees about workplace safety and health issues through regular internal communication channels such as supervisor-employee meetings, bulletin board postings, memos, or other written communications. The Safety Committee, which is composed of representatives from throughout the organization, has been established to help monitor the Company's safety program and to facilitate effective communication between employees and management about workplace safety and health issues. The Safety Committee has responsibility for implementing, administering, monitoring, and evaluating the safety program. Its success depends on the

alertness and personal commitment of all.

Employees and supervisors receive periodic workplace safety training. The training covers potential safety and health hazards and safe work practices and procedures to eliminate or minimize hazards.

Some of the best safety improvement ideas come from employees. Those with ideas, concerns, or suggestions for improved safety in the workplace are encouraged to raise them with their supervisor, or with another supervisor or manager, or bring them to the attention of a member of the labor-management safety committee. Reports and concerns about workplace safety issues may be made anonymously if the employee wishes. All reports can be made without fear of reprisal.

#### *Reporting Unsafe Conditions or Practices*

Employees are expected to be on the lookout for unsafe working conditions or practices, regardless of how insignificant the injury may appear. If you observe an unsafe working condition, you should warn others, if possible, and report that unsafe working condition to the COO immediately. If you have a question regarding the safety of your workplace and practices, ask the COO for additional information.

If you observe a co-worker using an unsafe practice, you are expected to mention this to the co-worker and to the COO. Likewise, if a co-worker brings to your attention an unsafe practice you may be using, please thank the co-worker and make any necessary adjustments to what you are doing. Safety at work is a team effort.

The Company will not retaliate against an employee who reports an unsafe working condition. This is important because one goal of the Company is to provide a safe and appropriate workplace.

#### **VISITORS IN THE WORKPLACE**

To provide for the safety and security of employees and the facilities at the Company, only authorized visitors are allowed in the workplace. Restricting unauthorized visitors helps maintain safety standards, protects against theft, ensures security of equipment, protects confidential information, safeguards employee welfare, and avoids potential distractions and disturbances.

Because of safety and security reasons, family and friends of employees are discouraged from visiting. In cases of emergency, employees will be called to meet any visitor outside their work area.

If an unauthorized individual is observed on the Company's premises, employees should immediately notify their supervisor or, if necessary, direct the individual to the office.



## **MAINTAINING A SAFE WORKSITE**

We expect employees to establish and maintain a safe worksite. This includes but is not limited to the following:

- i. Wear appropriate safety gear at all times.
- ii. Wear appropriate clothing around or while operating machinery.
- iii. Handle tools and machinery with care and respect.
- iv. Refrain from using cell phones, MP3 players or other electronic devices while handling Company machinery or vehicles or working in the factory.
- v. Refrain from horseplay and practical jokes in the workplace.
- vi. Never operate Company machinery or vehicles while intoxicated or taking medications that impair your judgment.
- vii. Never tamper with or use equipment in an unauthorized manner.
- viii. Employees may not chew gum or eat candy or food while working in production.
- ix. Employees working in production must wear a hairnet, gloves, proper boots, a clean apron, and any other clothing that the Company deems to be appropriate at all times.

Employees can prevent accidents and contribute to a safe work environment by carefully examining their equipment to see if it is in good working order on a routine basis, and report any needed repairs.

## **REPORTING AN INJURY**

Employees are required to report any injury, accident, or safety hazard immediately to the COO. Minor cuts or abrasions must be treated on the spot. More serious injuries or accidents will be treated accordingly. Serious injuries must be reported on the injury or accident report form available in the main office. A digital accident report is available online on the company forms site at [253organicforms.com](http://253organicforms.com) pw: 253

## **FIRST AID**

Only those employees certified to provide first aid may provide first aid.

## **CARE OF EQUIPMENT AND SUPPLIES**

All employees are expected to take care of all equipment (*e.g.*, tools, computers, cell phones, etc.) and supplies provided to them. You are responsible for maintaining any equipment provided to you in proper working condition and for promptly reporting any problems with the equipment to the COO.

If employees find that equipment is not working properly or in any way appears unsafe, they must notify their supervisor immediately so that repairs or adjustments may

be made. Under no circumstances should employees start or operate equipment that they deem unsafe, nor should they adjust or modify the safeguards provided.

Delivery drivers are expected to make a daily visual inspection of the vehicles and to promptly report any damage to the vehicle. The drivers must also maintain the cleanliness of the inside and outside of the vehicle. The drivers must report any accident or incident immediately.

Neglect, theft, and/or destruction of the Company's equipment are grounds for disciplinary action, up to and including termination of employment.

### **SMOKING AT THE WORKPLACE**

The Company's policy is to provide smoke-free environments for our employees, customers and visitors. Smoking of any kind is prohibited inside our buildings. Employees may smoke on scheduled breaks or during meal times, as long as they do so in designated areas. Smoking breaks must be limited to 3 times daily. Employees who take excessive smoke breaks may be required to work longer hours to make up for time lost smoking.

### **VIOLENCE AND WEAPONS**

The Company believes in maintaining a safe and healthy workplace, in part by promoting open, friendly, and supportive working relationships among all employees. Violence or threats of violence have no place in our business. Violence is not an effective solution to any problem. Employees are strictly prohibited from bringing any weapons, including knives, pistols, rifles, stun guns, Mace, etc., to work. Conduct that threatens, intimidates or coerces another employee, a customer or a member of the public at any time, including off-duty periods, will also not be tolerated. Furthermore, if you have a problem that is creating stress or otherwise making you agitated, you are encouraged to discuss it with the COO or the Human Resources Manager.

You are expected to immediately report to the COO any violation of this policy. Any employee found threatening another employee (directly or indirectly), fighting, and/or carrying weapons to work will be subject to disciplinary action, up to and including termination of employment.

### **DRUG-FREE WORKPLACE**

The Company does not tolerate the presence of illegal drugs or the illegal use of legal drugs in our workplace. The use, possession, distribution, or sale of controlled substances such as drugs or alcohol, or being under the influence of such controlled substances is strictly prohibited while on the Company's premises or while visiting customers. The use of illegal drugs as well as the illegal use of legal drugs is a threat to everyone because it can cause problems with safety, customer service, productivity, and our ability to survive and prosper as a business. If you need to take a prescription drug

that affects your ability to perform your job duties, you are required to discuss possible accommodations with the COO. Violation of this policy will result in disciplinary action, up to and including termination of employment.

To help ensure a safe and healthful working environment, job applicants and employees may be asked to provide body substance samples (such as urine and/or blood) to determine the illicit or illegal use of drugs and alcohol. Refusal to submit to drug testing may result in disciplinary action, up to and including termination of employment. Questions concerning this policy or its administration should be directed to the COO. Nothing in this section shall be read to override any protections provided to employees by The Regulation and Taxation of Marijuana Act, as amended by St. 2017,c.55, An Act To Ensure Safe Access To Marijuana, with which the Company will comply fully and recognize all associated employee rights.

Any employee who is convicted of violating criminal drug statutes must notify the COO or HR of that conviction within five days of the conviction. Failure to do so may lead to disciplinary action.

**Your receipt of this policy statement and signature on the handbook acknowledgment form signify your agreement to comply with this policy.**

#### **RESPONDING TO CUSTOMER INQUIRIES AND PROBLEMS**

At the Company, customer satisfaction is the measure of our success. It is the responsibility of each employee who interacts with customers to respond to customer's inquiries and problems in a professional and courteous manner.

#### **APPEARANCE AND DRESS**

In order to maintain a clean and safe working environment, all employees are required to wear appropriate clothing on the job.

Employees should always be neatly groomed and clothes should be clean and in good repair.

Your supervisor or department head is responsible for establishing a reasonable dress code appropriate to the job you perform. If your supervisor feels your personal appearance is inappropriate, you may be asked to leave the workplace until you are properly dressed or groomed. Under such circumstance, you will not be compensated for the time away from work. Consult your supervisor if you have questions as to what constitutes appropriate appearance. Where necessary, reasonable accommodation may be made to a person with a disability.

Without unduly restricting individual tastes, the following personal appearance guidelines should be followed:

- i. Shoes must provide safe, secure footing, and offer protection against hazards.
- ii. Tank tops, tube or halter tops, may not be worn under any circumstances.
- iii. Hairstyles are expected to be clean and in good taste.
- iv. No facial piercings such as nose rings, eyebrow piercings, lip rings, etc. are allowed.
- v. No jewelry or nail polish while working in production.

### **CONFLICTS OF INTEREST**

You should avoid external business, financial, or employment interests that conflict with the Company's business interests or with your ability to perform your job duties. This applies to your possible relationships with any other employer, customer, or business associate.

This policy establishes only the framework within which the Company wishes the business to operate. The purpose of these guidelines is to provide general direction so that employees can seek further clarification on issues related to the subject of acceptable standards of operation. Contact the Human Resources Department for more information or questions about conflicts of interest.

An actual or potential conflict of interest occurs both when an employee's responsibility of loyalty to the Company is compromised by the employee's outside interests and when an employee's influence over a decision may result in a personal gain for that employee or for a relative, friend, or other person with whom the employee has a personal relationship as a result of the Company's business dealings. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

Transactions with outside firms must be conducted within a framework established and controlled by the executive level of the Company. Business dealings with outside firms should not result in unusual gains for those firms. Unusual gain refers to bribes, product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit either the employer, the employee, or both.

Personal gain may result not only in cases where an employee or relative has a significant ownership in a firm with which the Company does business, but also when an employee or relative receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving the Company.

No "presumption of guilt" is created by the mere existence of a relationship with outside firms. However, if employees have any influence on transactions involving purchases, contracts, or leases, it is imperative that they disclose to an officer of the Company as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.

Violations of this rule may lead to disciplinary action, up to and including termination of employment.

### **CODE OF ETHICAL CONDUCT**

To ensure the successful business operation of the Company, we expect that all of our employees will conduct themselves fairly and ethically. The Company's reputation for integrity and excellence requires that our employees carefully observe the spirit and letter of all applicable laws and regulations and at all times exhibit a scrupulous regard for the highest standards of conduct and personal integrity.

The Company's success is dependent upon its outstanding reputation which we are dedicated to preserving. Employees owe a duty to the Company and its principals to act in a way that will merit the excellent reputation enjoyed by the Company.

The Company will comply with all applicable laws and regulations and expects its directors, officers, and employees to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest or unethical conduct, conflicts of interest, as discussed below are strictly prohibited.

In order to avoid any appearance of a conflict of interest, employees are expected to abide by the following code of ethical conduct. Please consult the COO if you have any questions.

Employees of the Company should not solicit anything of value from any person or organization who has (or may have) a business relationship with the Company.

Employees of the Company should not accept any item of value from any person or organization in exchange for or in connection with a business transaction between the Company and that other person or organization.

Employees may accept items of incidental value (generally, no more than \$25) from customers, suppliers, or others as long as the gift is not given in response to solicitation on your part and as long as it implies no exchange for business purposes. Items may include gifts, gratuities, food, drink and entertainment.

If you are faced with and are unsure how to handle a situation that you believe has the potential to violate this code of ethical conduct, notify the COO.

Violations of this code may lead to disciplinary action, up to and including termination of employment.

## **SOLICITATION AND DISTRIBUTION**

For the safety, convenience, and protection of all employees, the Company prohibits solicitation and distribution of non-company materials on Company property at all times.

## **PERSONAL CALLS, VISITS, AND BUSINESS**

The Company expects the full attention of its employees while they are working. Although employees may occasionally have to take care of personal matters during the workday, employees should try to conduct such personal business either before or after their scheduled work shift or during breaks or meal periods. Regardless of when any personal call is made, it should be kept short.

Employees should also limit incoming personal calls, visits, or personal transactions. A pattern of excessive personal phone calls, personal visits, and/or private business dealings during work hours is not acceptable and may lead to disciplinary action.

## **BUSINESS EXPENSES**

Employees may occasionally incur expenses on behalf of the Company. Employees must receive prior written approval from the COO or the Human Resources Manager. The Company will reimburse employees for typical business expenses, such as mileage (*e.g.*, travel to visit a customer during the workday) and certain job-related supplies or materials. The Company will pay mileage reimbursements at the end of each month, upon receipt of the employee's mileage record. In order to be reimbursed for job-related supplies or materials, you must deliver a receipt for the supplies or materials to the Human Resources Manager within 7 days of the purchase.

## **PERSONAL PROPERTY**

Personal items should not be stored or kept in Company desks, lockers or files. The Company will not be responsible for the loss or theft of personal items at its facilities, and employees should have no expectation that documents, photographs, or other items left on Company property will remain private.

## **INSPECTION OF PERSONAL AND COMPANY PROPERTY**

The Company's employees use the property and equipment the Company owns and provides, and may also use the Company's materials, information, and other supplies. You must remember that property supplied by the Company remains the property of the Company. The Company reserves the right to search any Company property (*e.g.*, cell phones, desks, or other storage areas) at any time. The Company also reserves the right to inspect personal property (*e.g.*, purses and knapsacks) during the workday or as



employees leave the office. Refusal to allow inspection may lead to disciplinary action, up to and including termination of employment.

## **SECURITY POLICY**

The Security Policy protects Protected Personal Information as defined in the Massachusetts Data Security Law. Protected Personal Information is an individual's first name and last name or first initial and last name in combination with any one or more of the following data elements that relate to such individual:

- i. Social security number,
- ii. Driver's license number or state-issued identification card number, or
- iii. Financial account number, or credit card or debit card number, with or without any required security code, access code, personal identification number or password that would permit access to such individual's financial account (*e.g.*, checking account numbers, savings account numbers, etc.).

Protected Personal Information does not include information that is lawfully obtained from publically available information, or from federal, state or local government records lawfully made available to the general public.

### *Security Officer*

The Company has named Seth Rutherford as the Security Officer with the overall responsibility for the development, implementation, maintenance and supervision of security policies that conform to the Massachusetts Data Security Law. The Security Officer must ensure the confidentiality, integrity and availability of all electronic Protected Personal Information that the Company creates, receives, maintains or transmits; protect against any reasonably anticipated threats or hazards to the security or integrity of electronic Protected Personal Information; protect against any reasonably anticipated uses or disclosures of electronic Protected Personal Information that are not permitted or required; ensure compliance with the Massachusetts Data Security Law.

The Security Officer is responsible for ensuring that the Company:

- i. Complies with Massachusetts Data Security Law,
- ii. Develops and implements security policies and procedures that comply with federal and state law,
- iii. Maintains the confidentiality of Protected Personal Information created or received by the Company from the date such information is created or received until it is destroyed,
- iv. Tests security safeguards on a routine basis,
- v. Reviews the scope of the security measures at least annually, or whenever there is a material change in the Company's business practices that may

- implicate the security or integrity of records containing Protected Personal Information, and
- vi. Provides the appropriate level of training for all employees, as required.

### *Internal Security*

To combat internal risks to security, confidentiality and/or integrity of any electronic, paper or other records containing Protected Personal Information, and evaluating and improving, where necessary, the effectiveness of the current safeguards for limiting such risks, the following measures are mandatory and effective immediately.

- i. A copy of this Security Policy must be distributed to all employees, who, upon receipt, must acknowledge in writing that he/she has received a copy.
- ii. Employment contracts and/or confidentiality agreements must contain provisions requiring employees to comply with this Security Policy and to prohibit any nonconforming use of Protected Personal Information during or after employment; with mandatory disciplinary action to be taken for any violation of this Security Policy. Violations may result in disciplinary action, up to and including termination of employment, assignment, or association with the Company. Such disciplinary action shall take into account the severity of the violation and the number of violations.
- iii. The amount of Protected Personal Information must be limited to the minimum amount needed for legitimate business purposes, or to comply with the Company's privacy policies and procedures, and federal and state regulations.
- iv. Access to records containing Protected Personal Information must be limited to those persons who need to have access to such information for legitimate business purposes or to comply with the Company's privacy policies and procedures, and federal and state regulations.
- v. Electronic access to user identification after multiple unsuccessful attempts to gain access must be blocked.
- vi. All security measures must be reviewed annually, or whenever there is a material change in the Company's business practices that may reasonably implicate the security or integrity of records containing Protected Personal Information. The Security Officer is responsible for this review and any recommendation for improved security arising out of that review.
- vii. Terminated employees must return all records containing Protected Personal Information, in any form, that may at the time of such termination be in the former employee's possession (including all such information stored on laptops or other portable devices or media, and in files, records, work papers, etc.).
- viii. A terminated employee's physical and electronic access to Protected Personal Information must be blocked immediately. Such terminated employee shall be required to surrender all keys, IDs, access cards or badges, business cards, etc., that permit access to the Company's premises

or information. Moreover, such terminated employee's remote electronic access, e-mail access, internet access, and passwords must be invalidated. The Security Officer shall maintain a highly secured master list of all lock combinations, passwords and keys.

- ix. Current employees' IDs and passwords must be changed periodically. Passwords must contain at least one alpha character, one numeric character and one symbol.
- x. Access to Protected Personal Information shall be restricted to active uses and active user accounts only.
- xi. Employees must immediately report any suspicious or unauthorized use of Protected Personal Information to the Security Officer.
- xii. Whenever there is a Security Breach requiring notification in accordance with the Massachusetts Data Security Law, there shall be an immediate mandatory post-incident review of events and actions taken, if any, with a view to determining whether any changes in the Company's security practices is required to improve the security of Protected Personal Information.
- xiii. Employees may not keep open files containing Protected Personal Information on their desks when they are not at their desks. Employees may not store Company files on personal computers or keep client files offsite.
- xiv. At the end of each work day, all files and other records containing Protected Personal Information must be secured in a manner that is consistent with the Company's privacy policies and procedures, and federal and state law. For example, materials should not be left in open spaces such as administrative assistants' desks. Also, employees must log off computers at the end of each working day.
- xv. The Company shall develop rules (bearing in mind its business needs) that ensure that reasonable restrictions upon physical access to records containing Protected Personal Information are in place, including a written procedure that sets forth the manner in which physical access to such records is restricted; and the Company must store such records and data in locked facilities; secure storage areas or locked containers.
- xvi. Access to electronically stored Protected Personal Information shall be electronically limited to those employees having a unique log-in ID; and re-log-in shall be required when a computer has been inactive for more than a few minutes.
- xvii. Visitors' access to the Company's offices must be restricted. Visitors may not be allowed to wander freely through the Company's offices. Whenever possible, employees should meet with visitors in a secure confidential space when conversations may involve Protected Personal Information. From time to time vendors are allowed free access to the Company's office. Employees should not conduct conversation regarding business matters when such visitors are present unless necessary.
- xviii. Paper or electronic records (including records stored on hard drives or other electronic media) containing Protected Personal Information shall be

disposed of only in a manner that complies with M.G.L.c. 93I (e.g., paper documents should be shredded prior to disposal).

- xix. Paper or electronic records (including records stored on hard drives or other electronic media) containing and/or Protected Personal Information shall be retained in a manner that complies with business practices, Federal and State laws.
- xx. To ensure system compatibility and the security of electronic information, employees may not install or modify software on any computer provided or owned by the Company unless express prior approval is provided by the Company. This approval must be obtained for each installation or service.
- xxi. To ensure that services provide appropriate security measures and that affected equipment can be safeguarded to avoid the downloading of computer viruses, express prior permission must be obtained from the Company before subscribing to, or using, any program that accesses information from external sources, including the use of any communications software, accessing any bulletin board or online service or use of the Internet.
- xxii. Employees may not use password protection or encryption (coding) software or similar protections on any system or file without express prior approval from the Company. Where permission is provided, the password must be provided to the Security Officer. The use of any type of encryption scheme or password, whether or not authorized, in no manner restricts the Company's rights to monitor use of Company -provided technologies (see Technology Policy).
- xxiii. Where passwords and sign-on codes are in place, users may not share their passwords except to the extent required to comply with this Security Policy. Passwords should be guarded and not written or accessible on or near the equipment. Users who have access to the Company's systems through remote technology should take special precautions to ensure that their equipment is not used in an unauthorized manner or by unauthorized individuals.
- xxiv. Whenever information is provided to anyone outside the Company's location in electronic form, such information must be encrypted and/or password protected.
- xxv. Employees who log into the Company's systems by way of a wireless communication must be securely configured and certified by an IT Specialist. If a user has any questions, he or she should contact IT.

### *External Security*

To combat external risks to security, confidentiality and/or integrity of any electronic paper or other records containing Protected Personal Information, and evaluating and improving, where necessary, the effectiveness of the current safeguards for limiting such risks, the following measures are mandatory and are effective immediately.

- i. There must be reasonably up-to-date firewall protection and operating system security patches, reasonably designed to maintain the integrity of the personal information, installed on all systems processing Protected Personal Information.
- ii. There must be reasonably up-to-date versions of system security agent software which must include malware protection and reasonably up-to-date patches and virus definitions, installed on all systems processing Protected Personal Information.
- iii. To the extent technically feasible, all personal information stored on laptops or other portable devices must be encrypted, as must all records and files transmitted across public networks or wirelessly, to the extent technically feasible. Encryption here means the transformation of data into a form in which meaning cannot be assigned without the use of a confidential process or key, unless further defined by regulation by the Massachusetts Office of Consumer Affairs and Business Regulation.
- iv. All computer systems must be monitored for unauthorized use of or access to personal information.
- v. There must be secure user authentication protocols in place, including: (a) protocols for control of user IDs and other identifiers; (b) a reasonably secure method of assigning and selecting passwords, or use of unique identifier technologies, such as biometrics or token devices; (c) control of data security passwords to ensure that such passwords are kept in a secure location.

### *Reporting Security Breaches*

The Company will mitigate any harm caused by unauthorized disclosures of Protected Personal Information and will notify affected clients and individuals when security breaches occur.

When an employee of the Company knows or has reason to know (1) of a Security Breach, or (2) that the Protected Personal Information was acquired or used by an unauthorized person or for an unauthorized purpose, that employee must notify the Security Officer immediately. The Security Officer will notify the Attorney General and the Office of Consumer Affairs and Business Regulation of that breach or unauthorized acquisition or use.

A “Security Breach” is the unauthorized acquisition or unauthorized use of unencrypted data or, encrypted electronic data and the confidential process or key that is capable of compromising the security, confidentiality, or integrity of Protected Personal Information, maintained by the Company that creates a substantial risk of identity theft or fraud against an individual. A good faith but unauthorized acquisition of personal information by a person or agency, or employee or agent, for the lawful purposes of such person or agency, is not a Security Breach unless the Protected Personal Information is used in an unauthorized manner or subject to further unauthorized disclosure.

“Encrypted” is defined as the transformation of data through the use of a 128-bit or higher algorithmic process into a form in which there is a low probability of assigning meaning without use of a confidential process or key, unless further defined by regulation of the Department of Consumer Affairs and Business Regulation.

### *Training*

The Security Officer (or his/her designee) will provide training for all employees who use or disclose Protected Personal Information. Furthermore, the Security Officer (or his/her designee) will provide annual training for all managers, employees, and independent contractors, including temporary and contract employees, who have access to Protected Personal Information on the elements of this Security Policy with the appropriate level of security training as required. All attendees at such training sessions are required to certify their attendance at the training and their familiarity with the Company’s requirements for ensuring the protection of Protected Personal Information.

### *Responsibility and Disciplinary Actions*

Each eligible employee has a duty to the Company to comply with the terms and conditions of this Security Policy. Any violations of this Security Policy must be reported to the Company or Security Officer.

Violations are subject to disciplinary action, up to and including termination of employment. Disciplinary action will be based on the severity of the violation(s) and the number of violations.

If any employee has a question with regard to this Security Policy, he or she should consult privately and confidentially with the Security Officer.

## **TECHNOLOGY POLICY**

253 Organic, LLC provides certain employees with computer and telephone equipment and a variety of technologies, including the capability to send or receive voice mail and electronic mail (“E-mail”) and access to several online services and other external resources. Unauthorized use of telephone and computer equipment can threaten the ability of these systems to operate properly and potentially subject the user and the Company to certain liabilities.

All messages created, sent or retrieved over the Company’s computer and telephone equipment are the sole property of the Company and not the employees. The Company reserves the right to access, search, inspect, copy, delete and disclose any message, communication or file on any voice mail, e-mail or computer system owned or operated by the Company at any time or for any reason. The Company also reserves the right to access, search, inspect, copy, delete and disclose any file stored in any electronic form or any other medium located on Company property or kept with files or equipment that belong to or are provided by the Company at any time for any reason. The Company



may also monitor telephone calls to assure quality. All equipment, software, files, disks, diskettes, communications or messages created, maintained or sent or received on any system or storage device provided by the Company are considered Company property.

Confidential information and trade secrets of the Company are not to be disclosed to any third person in any manner whatsoever, including without limitation, by electronic means, under any circumstances. Further, because cell phones, e-mail and voice mail are not completely secure, the utmost discretion should be used before sending and storing confidential or sensitive information, and, if at all possible, the most secure mode of transmission and storage should be used in accordance with the Company's Security Policy. If there are questions regarding which mode, of transmission is appropriate, please contact the Security Officer.

Employees may not use the Company's equipment to send or receive messages in violation of federal or state law, in violation of Company policy (*e.g.*, the Security Policy), in violation of the intellectual or other property right or interest of another or in any inappropriate, discriminatory or unauthorized manner. As an example and not by way of limitation, messages that are profane, vulgar, harassing, defamatory or promote a user's personal beliefs on non-business issues are prohibited. Use of Company -provided resources in violation of this policy will result in disciplinary action, up to and including termination. The Company, in its sole discretion, may advise appropriate law enforcement officials of any suspected violations of law without the prior consent of the sender or receiver of a communication or any other person.

### **CONFIDENTIAL AND PROPRIETARY INFORMATION**

The Company considers its confidential and proprietary information and trade secrets, including the confidential and proprietary information and trade secrets of our customers, to be one of its most valuable assets. As a result, employees must carefully protect and must not disclose to any other party at any time (including after any termination of employment) any confidential and proprietary information and trade secrets belonging to the Company or its customers except to the extent necessary to perform your duties for the Company or its clients or with the prior written consent of the COO. Such protected information includes, but is not limited to, the following examples:

- i. Personal or financial information regarding the principals, officers, directors or managers and their affiliated and/or related entities,
- ii. Personnel information
- iii. Any information relating to individuals, businesses or other entities which the Company has established a business or working relationship,
- iv. Customer or vendor lists and information,
- v. Financial information,
- vi. Business strategies,
- vii. Marketing strategies,
- viii. Contemplated or pending projects,
- ix. Proprietary business processes,

- x. Development and acquisition plans,
- xi. Research and development strategies,
- xii. Formulas, recipes, and product ingredients, and
- xiii. Any other proprietary information whether communicated orally or in documentary, computerized or other tangible form, concerning the Company's or its clients' operations and business.

The removal of materials, documents, files, records and other property belonging to the Company from the premises is not encouraged. However, if you must do so, please remember that confidential and proprietary information and trade secrets must be safeguarded at all times. Any electronic files you access remotely must also be safeguarded at all times.

Employees should ensure that any materials containing confidential or proprietary information are filed and/or locked up before leaving their work areas each day. During the workday, employees should not leave any sensitive information lying about or unguarded.

Employees who improperly use or disclose trade secrets, confidential or proprietary business information will be subject to disciplinary action, up to and including termination of employment, even if they do not actually benefit from the disclosed information. Neither these guidelines nor any terms set forth in a nondisclosure agreement shall be limiting to the other. Rather, each shall be construed broadly so as to compliment each other to provide the broadest protection for the Company's activities.

All Company property, including any materials containing confidential information, must be surrendered immediately upon notice of termination or demand.

If you have any questions about this policy, consult the COO.

#### **RULES OF CONDUCT AND PROGRESSIVE DISCIPLINARY PROCEDURE**

There are reasonable rules of conduct which must be followed in any organization to help a group of people work together effectively. The Company expects each employee to present himself or herself in a professional appearance and manner. If an employee is not respectful and considerate of others and does not observe reasonable work rules, disciplinary action will be taken.

Depending on the severity or frequency of the disciplinary problems, a verbal or written reprimand, suspension without pay, disciplinary probation, or discharge may be necessary. It is within the Company's sole discretion to select the appropriate disciplinary action to be taken. Notwithstanding the availability of the various disciplinary options, the Company reserves the right to terminate an individual's employment with the Company at its discretion, with or without notice.

The following is not a complete list of infractions for which an employee may be subject to discipline, but it is an example of those infractions that may result in immediate discipline, up to and including termination of employment, for a single offense:

- i. Excessive absenteeism (or absence without notice) or lateness (or lateness without notice).
- ii. Unsatisfactory performance or conduct.
- iii. Smoking anywhere on the property.
- iv. Chewing gum and/or eating in areas of the property where it is prohibited such as on the production floor.
- v. Use of cell phones for any purpose while working.
- vi. Dishonesty, including falsification of timecards and other Company-related documents, or misrepresentation of any fact.
- vii. Fighting, disorderly conduct, horseplay, or any other behavior which is dangerous or disruptive.
- viii. Cursing in the workplace.
- ix. Possession of, consumption of, or being under the influence of alcoholic beverages while on Company or customer premises or on Company business.
- x. Illegal manufacture, distribution, dispensation, sale, possession, or use of illegal drugs or unprescribed controlled substances.
- xi. Reporting for work with illegal drugs or unprescribed controlled substances in your body.
- xii. Possession of weapons, firearms, ammunition, explosives, or fireworks on Company premises (including parking areas) or customer premises.
- xiii. Failure to promptly report a workplace injury or accident involving any of the Company's employees, visitors, equipment, vehicles, or property.
- xiv. Commission of a crime, or other conduct which may damage the reputation of Company.
- xv. Use of profane language while on Company business.
- xvi. Stealing, misappropriating, or intentionally damaging property belonging to the Company or its visitors or employees.
- xvii. Unauthorized use of the Company's or its customers' name, funds, equipment, or property, including telephone, mail system or other employer-owned equipment.
- xviii. Insubordination, including failure to comply with any work assignments or instructions given by any Company employee with the authority to do so unless such assignment or instruction violates Company policies or federal or state law.
- xix. Violation of the Company's Equal Employment Opportunity Policy or its Harassment Policy.
- xx. Interference with the work performance of other employees.
- xxi. Failure to utilize Company machinery or equipment in accordance with the manufacturer's specifications.
- xxii. Failure to cooperate with an internal investigation, including, but not limited to, investigations of violations of these work rules.

- xxiii. Failure to maintain the confidentiality of proprietary information belonging to the Company or its customers.
- xxiv. Failure to comply with the Company's personnel policies and rules.
- xxv. Disqualification or expiration of Registered Agent Identification Card.

### **RE-EMPLOYMENT**

As a general rule, the Company will not rehire former employees who:

- i. Were dismissed by the Company;
- ii. Resigned without giving two weeks' notice;
- iii. Were dismissed for inability to perform job duties;
- iv. Had a poor attendance record; or
- v. Violated work rules or safety rules.

### **MOONLIGHTING/DAYLIGHTING**

The Company discourages our employees from taking additional outside employment. Employees who wish to take on outside employment must first obtain permission from the COO. Work requirements for the Company, including overtime, must take precedence over any outside employment.

The Company will not permit any employee to take an outside job with an employer in the same or related business as the Company, or which is in any way a competitor of the Company. Employees are not permitted to work for any customer of the Company outside of the regular working hours.

If the Company permits an employee to take outside employment, the employee must report to the COO when the outside job has started. If you are unable to work when requested by the Company (including overtime), or unable to maintain a high work performance level at the Company, permission to work at the outside job may be rescinded, or your employment with the Company may be terminated.

Employees are expected to be engaged in services and activities for the Company while at work. You may not engage in outside activities during working hours (*i.e.*, daylighting).

## **BENEFITS**

### **WORKERS' COMPENSATION BENEFITS**

The Company purchases workers' compensation insurance for employees who suffer accidental injuries or occupational diseases arising out of and in the course of employment. Benefit coverage and medical payments will be in accordance with the requirements of the Massachusetts Workers' Compensation law.

In the event of an accident or injury, you must notify the COO immediately, no matter how minor the incident or accident may appear. Depending on the severity of the injury, the injured employee may be referred to an emergency room or a local clinic.

If you are injured, you must complete the necessary accident/incident reports within 24 hours of the injury. The Company reserves the right to require that you be tested for the presence of drugs or alcohol after any accident.

### **VACATION TIME**

The Company provides its full-time employees with vacation time each year as a way to express our appreciation and a way to renew and refresh our employees. Because our business can experience strict deadlines on projects, the Company reserves the right to grant vacations at times that are most suitable for our business conditions and to limit vacations during our busy times.

To qualify for vacation, a full time employee must complete 90 days of continuous employment.

If you are a full-time employee hired:	You may use up to:
Prior to the current calendar year	40 hours of vacation between January 1 and December 31.
Between January 1 and June 30 of the current calendar year	40 hours of paid vacation between your date of hire and December 31.
Between July 1 and September 30 of the current calendar year	20 hours of vacation between your date of hire and December 31.
Between October 1 and December of the current calendar year	0 hours of vacation between your date of hire and December 31.

Employees must use all vacation in the calendar year in which it is granted. It should be scheduled and approved by the Human Resources Manager at least two weeks in advance. Any unused vacation will be forfeited at the end of each calendar year. The

Human Resources Manager may at his/her discretion allow employees to carry over unused vacation into a subsequent calendar year.

Upon termination of employment for any reason, employees are paid for any accrued but unused vacation during that calendar year.

Part-time, temporary and seasonal employees are not eligible for vacation.

### **SICK TIME**

After a period of employment of 90 days of continuous employment, employees are entitled to 40 hours of paid Sick / Personal Leave for the care and treatment of themselves or a family member.

The state authorized use of sick time is as follows:

- To care for the employee's child, spouse, parent, or parent of a spouse, who suffers from a physical or mental illness, injury, or medical condition that requires home care, professional medical diagnosis or care, or preventative medical care;
- To care for the employee's own physical or mental illness, injury, or medical condition that requires home care, professional medical diagnosis or care, or preventative medical care;
- To attend regular medical appointments for the employee or the employee's child, spouse, parent, or parent of a spouse;
- To address the psychological, physical, or legal effects of domestic violence; and
- To travel to and from an appointment, a pharmacy, or other location related to the purpose for sick leave was taken.

253 Organic, LLC would like to allow flexibility for our employees to use this time for unforeseen circumstances other than illness. We understand that there are sometimes non-medical family emergencies, and non-medical appointments that need to be addressed. Employees must understand, however, that if they use this time for non-medical occurrences, they are taking the chance of exhausting their sick time for the future.

The flexibility in this policy is not intended to be used as an extension of the vacation policy. People using their vacation time will not be granted preplanned use of Sick/Personal Leave immediately before or after a scheduled vacation.

If the need is foreseeable, the employee should provide 7 days advance notice of their intention to use Sick / Personal Leave. If the need is not foreseeable, the employee must notify his/her supervisor as soon as practicable. Calling or texting a co-worker is not appropriate notification.

Any unused Sick / Personal Leave will be paid out to employees on December 31<sup>st</sup> of each year and a fresh benefit of 40 hours will be applied to payroll accruals on January 1<sup>st</sup>.



Upon termination of employment for any reason, employees are not paid for any accrued but unused sick leave.

## **LEAVES OF ABSENCE**

### *Parental Leave*

Parents, who have completed at least ninety (90) consecutive days of full-time employment with the Company, may take an unpaid leave of absence for the purpose of giving birth or adopting a child under the age of eighteen (18) (or for adopting a child under the age of twenty-three (23) if the child is mentally or physically disabled) up to a period of eight (8) consecutive weeks. Employees must provide at least two weeks notice of the anticipated date of departure and the employee's intention to return. If the need is not foreseeable, the employee must provide notice as soon as practicable if the reason for the delay is beyond the employee's control.

At the end of the bonding leave, the employee will be reinstated to his/her previous or similar position with the same status, pay, benefit accrual and seniority as of the date of his/her leave unless business necessity makes this impossible or unreasonable and the leave exceeds eight (8) weeks.

### *Jury Leave*

Employees who are called for jury duty will be granted time off with pay to perform this civic duty. Employees must notify HR as soon as they learn they have been summoned as a juror so that work arrangements can be made. In order to be paid for Jury Leave, an employee must provide the HR with the jury summons and a note from the Clerk of the Court indicating the times the employee was in court for jury duty. The Company will pay employees straight time for their regularly scheduled hours of work, minus the compensation they received from the court for their service as jurors, for up to five days of jury service. An employee who is excused from jury duty prior to the end of a regularly scheduled workday must report for work for the remainder of that day, or otherwise notify HR of his or her availability to work.

### *Military Leave*

The Company will grant employees called into military service an unpaid leave of absence and reemployment rights as provided by the laws of the United States.

Employees in the military reserve or National Guard will be granted two-weeks off to fulfill their annual two-week training obligation. Upon submission of military pay vouchers, employees will be paid the difference between military pay and their regular base pay for such two-week training period.

In addition, new FMLA regulations include two types of military family leave referred to as "qualifying exigency leave" and "military caregiver leave". Employees

should speak with the HR regarding military leave. Reinstatement following military leave will be in compliance with state and federal law.

#### *Voting Leave*

Generally, employees should vote before or after regularly scheduled work hours. However, employees may request unpaid leave, if needed, to vote during the first two hours after the polls open.

#### **PARKING**

Parking at the Company in designated areas is available for all employees. Employees should consult their supervisor for the location assigned to them. The Company will not be liable for damage, theft, or other destruction of an employee's property while utilizing the parking lot.

## **ACKNOWLEDGEMENT OF RECEIPT OF EMPLOYEE HANDBOOK**

I have received the current employee handbook maintained by 253 Organic, LLC (the “Company”) and have read and understand the material covered. I have had the opportunity to ask questions about the policies in this handbook, and I understand that any future questions that I may have about the handbook or its contents will be answered by the Human Resources Manager upon request. I agree to and will comply with the policies, procedures, and other guidelines set forth in the handbook. I understand that the Company reserves the right to change, modify, or abolish any or all of the policies, benefits, rules, and regulations contained or described in the handbook as it deems appropriate at any time, with or without notice. I acknowledge that neither the handbook nor its contents are an express or implied contract regarding my employment.

I further understand that all employees of the Company, regardless of their classification or position, are employed on an at-will basis, and their employment is terminable at the will of the employee or the Company at any time, with or without cause, and with or without notice. I have also been informed and understand that no officer, agent, representative, or employee of the Company has any authority to enter into any agreement with any applicant for employment or employee for an employment arrangement or relationship other than on an at-will basis and nothing contained in the policies, procedures, handbooks, or any other documents of the Company shall in any way create an express or implied contract of employment or an employment relationship other than one on an at-will basis.

This handbook is Company property and must be returned upon termination of employment.

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Signature

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Date

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Employee Name: Printed

253 ORGANIC, LLC

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MANUAL DEL EMPLEADO

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Actualizado el 4 de agosto de 2020

# 253 ORGANIC, LLC

## MANUA EMPLEADO

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## **BIENVENIDOS A 253 ORGÁNICA, LLC**

253 Orgánica, LLC (la ‘Compañía’) proporciona este manual para darle una visión general de las políticas, beneficios y reglas de la Compañía. Este manual contiene información importante sobre la Compañía y sobre su empleo con la Compañía. Por favor, comprenda que este manual solo proporciona información general sobre las políticas, beneficios y regulaciones que rigen a los empleados de la Compañía y no es un documento legal. Tampoco pretende ser un contrato expreso o implícito. Las pautas presentadas en este manual no pretenden reemplazar la buena gestión, juicio y discreción.

Este manual no crea un acuerdo de empleo y los empleados se consideran empleados a voluntad (como se describe más detalladamente en este documento).

Es imposible anticipar cada situación que pueda surgir en el lugar de trabajo o proporcionar información que responda a todas las preguntas posibles. Como resultado, es posible que la Compañía deba interpretar partes de este manual o desviarse de sus disposiciones expresas. Además, las circunstancias indudablemente requerirán que las políticas, prácticas y beneficios descritos en este manual cambien de vez en cuando. Como resultado, la Compañía se reserva el derecho de modificar, complementar, rescindir o revisar cualquier disposición de este manual de vez en cuando, según lo considere necesario o apropiado a su exclusivo criterio, con o sin previo aviso.

Todos debemos trabajar juntos para hacer de la Compañía una organización viable, saludable y rentable. Esta es la única forma en que podemos proporcionar un ambiente de trabajo satisfactorio que promueva una preocupación genuina y respeto por los demás, incluidos todos los empleados y nuestros clientes. Si alguna de las declaraciones de este manual no le resulta clara, comuníquese con Recursos Humanos.

## **FILOSOFÍA DE LA COMPAÑÍA**

### **POLÍTICA DE PUERTAS ABIERTAS**

Las comunicaciones abiertas y el flujo de información son importantes para la Compañía. La Compañía se comunica con sus empleados a través de avisos y reuniones. Estas comunicaciones están destinadas a mantenerlo actualizado e informado.

De acuerdo con la filosofía de comunicación abierta de la Compañía, todos los empleados tienen el derecho y se los alienta a hablar libremente con la gerencia sobre sus inquietudes relacionadas con el trabajo.

Le instamos a que vaya directamente a la gerencia para discutir sus ideas, recomendaciones, inquietudes y otros asuntos relacionados con el trabajo que son importantes para usted. Si, después de hablar con la gerencia, siente la necesidad de una discusión adicional,

se lo alienta a hablar con el Director de Operaciones o Recursos Humanos. No se pueden tomar represalias o acciones adversas contra un empleado que cumpla con esta política de buena fe.

La relación más importante que desarrollará en la Compañía será entre usted y sus compañeros de trabajo. Sin embargo, si necesita el apoyo de alguien que no sea un compañero de trabajo, la gerencia se compromete a resolver sus inquietudes individuales de manera oportuna y adecuada.

### **IGUALDAD DE OPORTUNIDADES DE EMPLEO**

Es la política de la Compañía proporcionar igualdad de oportunidades de empleo a todos los empleados y solicitantes de empleo y no discriminar por cualquier motivo prohibido por la ley, incluyendo raza, color, género, edad, religión, origen nacional, origen étnico, discapacidad, matrimonio, estado, estado de veterano, transgénero, orientación sexual, información genética o cualquier otra base prohibida por la ley. Es nuestra intención y deseo que se brinden igualdad de oportunidades de empleo en el empleo, reclutamiento, selección, compensación, beneficios, promoción, degradación, despido, terminación y todos los demás términos y condiciones de empleo. El director de operaciones y todo el personal administrativo están comprometidos con esta política y su cumplimiento.

Si está discapacitado y necesita una adaptación razonable para realizar las funciones esenciales de su trabajo, puede solicitar una adaptación. La Compañía hará todo lo posible para proporcionar una adaptación razonable para su discapacidad conocida (si es una persona calificada) para que pueda realizar las funciones esenciales de su trabajo cuando pueda hacerlo sin amenaza directa para usted u otros.

Se ordena a los empleados que denuncien cualquier violación de esta política a la atención inmediata de Recursos Humanos o el Director de Operaciones. Cualquier empleado que viole esta política o tome represalias a sabiendas contra un empleado que informe o se queje de una violación de esta política estará sujeto a medidas disciplinarias inmediatas, que pueden incluir el despido. Las quejas presentadas en virtud de esta política serán investigadas y tratadas con la debida consideración de la privacidad y el respeto de todos los involucrados.

### **POLÍTICA DE ACOSO**

La Compañía no tolerará el acoso o la intimidación de nuestros empleados sobre cualquier base prohibida por la ley, incluyendo raza, color, género u orientación sexual, edad, ascendencia, religión, origen nacional, origen étnico, discapacidad, discapacidad, estado civil, militar activo o estado de veterano, o información genética. Es política de la Compañía que cualquier acoso, incluidos los actos que crean un ambiente de trabajo hostil o cualquier otro acto discriminatorio dirigido contra nuestros empleados, dará lugar a medidas disciplinarias, que pueden incluir el despido. La Compañía tampoco tolerará el acoso de nuestros empleados por parte de nuestros clientes, proveedores u otras personas con quienes nuestros empleados entren en contacto en nuestro lugar de trabajo.

Los empleados deben informar cualquier violación de esta política a la atención inmediata de cualquiera de los 253 funcionarios (CEO, CFO, COO). La Compañía investigará a fondo todos los reclamos de acoso teniendo en cuenta la privacidad de las personas involucradas. Cualquier empleado que a sabiendas tome represalias contra un empleado que haya denunciado acoso o discriminación en el lugar de trabajo estará sujeto a medidas disciplinarias inmediatas, que pueden incluir el despido.

## **POLÍTICA DE ACOSO SEXUAL**

### *Introducción a la*

La meta de la Compañía es promover un lugar de trabajo libre de acoso sexual. El acoso sexual de los empleados que se produce en el lugar de trabajo o en otros entornos en los que los empleados pueden encontrarse en relación con su empleo es ilegal y la Compañía no lo tolerará.

Se alienta a los empleados a informar a la empresa sobre el acoso sexual. Cualquier represalia contra una persona que se ha quejado de acoso sexual o represalia contra personas por cooperar con una investigación de una queja de acoso sexual también es ilegal y no será tolerada. Para lograr nuestro objetivo de proporcionar un lugar de trabajo libre de acoso sexual, la conducta que se describe en esta política no será tolerada y hemos creado un procedimiento para manejar las preocupaciones de conducta inapropiada.

Debido a que la Compañía toma en serio las denuncias de acoso sexual, responderemos con prontitud a las quejas de acoso sexual y, cuando se determine que se ha producido una conducta inapropiada, actuaremos con prontitud para eliminar la conducta e imponer las medidas correctivas que sean necesarias, incluidas medidas disciplinarias. acción donde sea apropiado.

Tenga en cuenta que si bien esta política establece nuestros objetivos de promover un lugar de trabajo que esté libre de acoso sexual, la política no está diseñada ni destinada a limitar nuestra autoridad para disciplinar o tomar medidas correctivas para la conducta en el lugar de trabajo que consideramos inaceptable, independientemente de si esa conducta satisface la definición de acoso sexual.

### *Definición de acoso sexual*

“sexual” significa avances sexuales, solicitudes de favores sexuales y conducta verbal o física de naturaleza sexual cuando: La

- i. presentación o el rechazo de dichos avances, solicitudes o conducta se hace explícita o implícitamente como un término o condición de empleo o como base para decisiones de empleo; o,
- ii. dichos avances, solicitudes o conducta tienen el propósito o efecto de interferir injustificadamente con el desempeño laboral de un individuo creando un ambiente de trabajo intimidante, hostil, humillante u sexualmente ofensivo.

Según estas definiciones, las solicitudes directas o implícitas de un compañero de trabajo de favores sexuales a cambio de beneficios laborales reales o prometidos, como revisiones favorables, aumentos salariales, promociones, mayores beneficios o empleo continuo, constituyen acoso sexual.

La definición legal de acoso sexual es amplia y, además de los ejemplos anteriores, otras conductas de orientación sexual, ya sea intencional o no, no son bienvenidas y tienen el efecto de crear un ambiente laboral hostil, ofensivo, intimidante o humillante. para trabajadores masculinos o femeninos también puede constituir acoso sexual.

Si bien no es posible enumerar todas esas circunstancias adicionales que pueden constituir acoso sexual, los siguientes son algunos ejemplos de conducta que, si no deseada, puede constituir acoso sexual en función de la totalidad de las circunstancias, incluyendo la gravedad de la conducta y su omnipresencia:

- i. Unwelcome avances sexuales, ya sea que impliquen contacto físico o no;
- ii. Epítetos sexuales, chistes, referencias escritas u orales a la conducta sexual, chismes sobre la vida sexual de uno; comentar sobre el cuerpo de un individuo, comentar sobre la actividad sexual, deficiencias o destrezas de un individuo;
- iii. Exhibición de objetos sexualmente sugerentes, imágenes, salvapantallas, dibujos animados o videos;
- iv. Liderazgo, silbidos, roces inoportunos contra el cuerpo, gestos sexuales, comentarios sugestivos o insultantes;
- v. Investigaciones sobre las experiencias sexuales de uno;
- vi. Discusión de las actividades sexuales de uno;
- vii. Enviar correos electrónicos o mensajes de texto con orientación sexual o basados en el sexo;
- viii. El uso de la computadora para diseminar comunicaciones de orientación sexual o basadas en el sexo; y
- ix. Acceso a sitios web de Internet sexualmente explícitos.

Todos los empleados deben tomar nota especial de que, como se indicó anteriormente, las represalias contra una persona que se ha quejado de acoso sexual y las represalias contra personas por cooperar con una investigación de una queja de acoso sexual son ilegales y no serán toleradas por esta Compañía.

### *Quejas de acoso sexual*

Si alguno de nuestros empleados cree que él o ella ha sido objeto de acoso sexual, el empleado tiene derecho a presentar una queja ante RRHH. Esto puede hacerse por escrito u oralmente.

Si desea presentar una queja, puede hacerlo comunicándose con cualquiera de las siguientes personas:

John Snyder

Bambi Rawlings-Chamberlin

Director de Operaciones  
253 Millers Falls Road  
Turners Falls, MA 01376  
Tel. 716-796-4679

Gerente de Recursos Humanos  
253 Millers Falls Road  
Turners Falls, MA 01376  
Tel. 413-863-5704

También están disponibles para discutir cualquier inquietud que pueda tener y para proporcionarle información sobre nuestra política sobre acoso sexual y nuestro proceso de quejas.

#### *Investigación de acoso sexual Investigaremos de*

inmediato la acusación de manera justa y expedita. Además, haremos todo lo posible para mantener la confidencialidad bajo las circunstancias. Nuestra investigación incluirá una entrevista privada con la persona que presenta la queja y con testigos. También entrevistaremos a la persona que supuestamente cometió acoso sexual. Cuando hayamos completado nuestra investigación, informaremos, en la medida apropiada, a la persona que presenta la queja y a la persona que supuestamente ha cometido la conducta de los resultados de esa investigación.

Si se determina que ha ocurrido una conducta inapropiada, actuaremos con prontitud para eliminar la conducta ofensiva, y donde sea apropiado, también impondremos medidas disciplinarias.

#### *Acción disciplinaria*

Si se determina que uno de nuestros empleados ha cometido una conducta inapropiada, tomaremos las medidas que sean apropiadas según las circunstancias. Dicha acción puede variar desde asesoramiento hasta la terminación del empleo, y puede incluir otras formas de acción disciplinaria que consideremos apropiadas según las circunstancias.

#### *Remedios estatales y federales*

Además de lo anterior, si cree que ha sido objeto de acoso sexual o cualquier otra forma de discriminación, puede presentar una queja formal ante una o ambas agencias federales o estatales que se detallan a continuación. El uso de nuestro proceso de quejas no le prohíbe presentar una queja ante estas agencias. Cada una de las agencias enumeradas a continuación tiene un corto período de tiempo para presentar una reclamación ante la agencia (EEOC - 300 días; MCAD - 300 días;). Puede haber otros períodos de tiempo para presentar reclamos en la corte.

- i. La Comisión de Igualdad de Oportunidades en el Empleo ( "EEOC")  
1 Congress Street, 10<sup>th</sup> Floor  
Boston, MA 02114  
617-565-3200  
<http://www.eeoc.gov/boston/index.html>

- ii. Comisión de Massachusetts Contra la Discriminación ( “MCAD” )  
One Ashburton Place  
Boston, MA  
02108 617-727-3990  
<http://www.mass.gov/mcad/>

## **TRABAJO Y COMPENSACIÓN**

### **EMPLEO A VOLUNTAD**

Todos los empleados de la empresa, independientemente de su clasificación o puesto, están empleados a voluntad. Esto significa que el empleo de cada empleado puede rescindirse a voluntad del empleado o de la Compañía en cualquier momento, con o sin causa y con o sin previo aviso. Cualquier funcionario, agente, representante o empleado de la Compañía, excepto por escrito y firmado por el Director de Operaciones, no tiene la autoridad para celebrar ningún acuerdo con ningún empleado o solicitante de empleo que no sea a voluntad. Además, nada contenido en las políticas, procedimientos, manuales, manuales, descripciones de trabajo, solicitudes de empleo o cualquier otro documento de la Compañía creará de ninguna manera un contrato de empleo explícito o implícito o una relación laboral que no sea basará.

### **ASISTENCIA E INFORMES AL TRABAJO**

Cada empleado es importante para el éxito general de nuestra operación. Cuando no estás aquí, alguien más debe hacer tu trabajo. En consecuencia, se espera que se presente al trabajo a tiempo al comienzo de su turno programado. Informar al trabajo a tiempo significa que está listo para comenzar a trabajar, no solo llegando al trabajo, a la hora de inicio programada.

La Compañía depende de que sus empleados estén en el trabajo en los horarios y lugares programados. El ausentismo excesivo y / o la tardanza conducirán a medidas disciplinarias, que pueden incluir el despido. La determinación del absentismo excesivo se realizará a discreción de la Compañía. La ausencia del trabajo durante tres días consecutivos sin notificar adecuadamente a su Supervisor Directo se considerará una renuncia voluntaria. Después de dos días de ausencia, es posible que se le solicite que proporcione documentación de su médico o clínica para respaldar una ausencia relacionada con una lesión o enfermedad, y para asegurarse de que pueda regresar al trabajo de manera segura.

Si espera estar ausente del trabajo por una razón aprobada (*porejemplo*, tiempo libre remunerado o un permiso de ausencia), debe notificar a su Supervisor Directo de su próxima ausencia con la mayor anticipación posible. Si inesperadamente necesita ausentarse o llegar tarde al trabajo, debe notificar a su Supervisor directo al menos 30 minutos antes del comienzo de su turno / día laboral programado que llegará tarde o ausente y proporcionará el motivo de esa ausencia o retraso. Si su Supervisor Directo no está disponible, debe comunicarse con el Gerente de Recursos Humanos o dejar un mensaje de voz para su Supervisor Directo antes del comienzo de su turno / día laboral programado. Asegúrese de dejar su número de teléfono para que su supervisor directo pueda devolverle la llamada. Si no se contacta adecuadamente con la



Compañía, se producirá una ausencia injustificada con fines disciplinarios. Su registro de asistencia es parte de su calificación general de desempeño. Su asistencia puede incluirse durante su revisión y puede considerarse para otras medidas disciplinarias que pueden incluir el despido.

Siempre que sea posible, las citas médicas y dentales deben programarse alrededor de las horas de trabajo asignadas; de lo contrario, pueden considerarse ausencias sin pago. Si no puede programar una cita antes o después de su día de trabajo programado regularmente, debe hablar con su Supervisor directo para hacer arreglos especiales.

Además, si abandona el trabajo temprano o por un período de tiempo durante el día, debe notificar a su Supervisor Directo cuando salga y cuándo espera regresar. Por ejemplo, debe notificar a su Supervisor Directo si necesita irse durante el almuerzo para hacer un recado.

### **HORARIO DE TRABAJO Y PROGRAMACIÓN**

El día de trabajo programado regularmente lo establece el gerente del empleado cuando lo contratan. Su horario está sujeto a cambios según las necesidades comerciales. Siempre que sea posible, la Compañía intentará avisarle con una semana de anticipación de un cambio en su horario, pero según las necesidades comerciales, es posible que la Compañía no pueda avisarle con anticipación.

En caso de condiciones no planificadas, como mal tiempo, que pueden forzar un cambio de horario en el último minuto, debe comunicarse con su gerente.

La Compañía generalmente programa períodos de comida y descanso durante la jornada laboral. Los períodos de descanso son descansos pagados de 15 minutos. Para las comidas, nuestra política es: Los

- i. períodos de comida no serán menos de 1/2 hora.
- ii. El período de comida no está pagado.
- iii. Se requiere que todos los empleados tomen un descanso para almorzar y ningún empleado está autorizado, sin aprobación previa, para realizar el trabajo durante el período del almuerzo.
- iv. El empleado debe pasar el período de comida lejos de su estación de trabajo.
- v. Un empleado puede pasar el período de comida en su estación de trabajo asignada solo si él / ella está trabajando durante el período de comida y las horas extras han sido aprobadas.

### **REGISTRO DE HORAS**

trabajadas Se requiere que todos los empleados registren su tiempo. La Compañía le proporcionará una tarjeta de tiempo para informar sus horas. Solo usted está autorizado a registrar su propio tiempo.

A menos que la Compañía lo autorice específicamente y solo si se debe realizar el trabajo, los empleados no pueden comenzar a registrar el tiempo antes de la hora de inicio programada regularmente o después de la hora de salida programada regularmente.

Cualquier tiempo perdido, que no exceda las 40 horas, durante la semana se puede recuperar durante la misma semana laboral con la aprobación del supervisor.

Los empleados deben correctamente registrarse sus horas para cada día hábil. Las tarjetas de tiempo completadas deben entregarse al Gerente de Recursos Humanos a más tardar a las 10:00 a.m. todos los lunes después del final de un período de pago. Si el último día del período de pago es feriado, las tarjetas de tiempo vencen el martes posterior al final del período de pago. Los supervisores son responsables de garantizar que el tiempo informado por los empleados sea exacto.

Si no entrega las tarjetas de tiempo antes de la fecha límite aplicable, puede retrasar su cheque de pago.

La falsificación de informes de tiempo o tiempo real trabajado puede resultar en una acción disciplinaria, que puede incluir el despido.

#### **PERÍODO DE PAGO Y DÍA DE PAGO**

La Compañía emite cheques cada dos viernes. Los períodos de pago comienzan el lunes por la mañana y terminan dos semanas después el domingo por la noche. El viernes después del último día de cada período de pago, recibirá un cheque de pago por todas las horas trabajadas durante ese período de pago. Si utiliza el depósito directo, su pago generalmente estará disponible para el retiro de su cuenta bancaria en la fecha de pago.

#### **DÍAS FESTIVOS**

La Compañía observa los siguientes días festivos:

- i. Día de Año Nuevo
- ii. Día de Acción de Gracias
- iii. Navidad

Los empleados de tiempo completo, incluidos aquellos en su período de prueba de 90 días, recibirán un pago por estos días festivos siempre que estén presentes para trabajar los días hábiles inmediatamente antes y después de eso. vacaciones, o tener una razón aceptable para estar ausente en esos días. Si un feriado pagado cae dentro del período de vacaciones de un empleado, el feriado no se contará como un día de vacaciones.

Los empleados a tiempo parcial, temporales y de temporada no son elegibles para el pago de vacaciones.

La Compañía estará abierta los siguientes días festivos:

- i. Día del Trabajo Día de los
- ii. Caídos Día de la
- iii. Independencia Día de
- iv. Colón después de la 1:00 pm
- v. Día de los Veteranos después de la 1:00 pm

Los empleados por hora en todos los departamentos recibirán una tarifa premium de 1.5 x su tarifa por hora cuando trabajen estos días. .

### **CLASIFICACIONES DE EMPLEO**

Al ser contratados por la Compañía, todos los empleados nuevos deben cumplir un período introductorio de noventa (90) días calendario. Es especialmente importante que informe al Gerente de Recursos Humanos de cualquier pregunta o problema que pueda encontrar durante este período. Su desempeño será monitoreado cuidadosamente durante este período. La finalización satisfactoria del período introductorio no le da derecho a un empleo por ningún período específico.

Con el único propósito de determinar la asignación de ciertos beneficios a los empleados, los empleados se clasifican en:

- i. Empleados regulares a tiempo completo : un empleado que tiene un horario promedio de cuarenta (40) horas por semana de forma regular y continua.
- ii. Empleados regulares a tiempo parcial : un empleado que generalmente está programado para trabajar menos de un promedio de cuarenta (40) horas por semana de manera regular y continua. Los empleados regulares a tiempo parcial no son elegibles para participar en los programas de beneficios para empleados disponibles para empleados regulares a tiempo completo.
- iii. Empleados temporales o estacionales : un empleado cuyos servicios se espera que tengan una duración limitada entra en esta clasificación. Los empleados temporales y estacionales no son elegibles para participar en los programas de beneficios para empleados disponibles para empleados regulares de tiempo completo.

Para fines de nómina, los empleados se clasificarán como uno de los siguientes:

- i. Empleados exentos : ciertos empleados, como los ejecutivos y los profesionales, reciben un salario por todas las horas trabajadas cada semana. Se espera que estos empleados trabajen las horas que sean necesarias para cumplir con sus obligaciones, incluso si exceden su semana laboral normal. No se pagarán primas por horas extras a los empleados exentos en la mayoría de las circunstancias.
- ii. Empleados no exentos : todos los empleados que no están identificados como empleados exentos se consideran empleados no exentos. Los empleados no exentos son elegibles para el pago de la prima de horas extras.

## **HORAS EXTRAS**

Ocasionalmente, puede ser necesario que un empleado por hora trabaje más allá de sus horas normales de trabajo. El pago de horas extras se paga solo cuando el trabajo es programado, aprobado y dado a conocer por adelantado al empleado por hora por un supervisor. El supervisor debe obtener la aprobación del director de operaciones antes de solicitar a un empleado por hora que trabaje horas extras. Bajo ninguna circunstancia los empleados por hora pueden trabajar horas extras sin dicha aprobación previa.

Los empleados por hora recibirán pago de horas extras a una tasa de una vez y media su tarifa regular por hora por todas las horas trabajadas que excedan de 40 en una semana laboral. Las horas no se pueden acumular, acumular ni promediar de una semana a otra. Además, en ningún caso, los empleados por hora pueden tomar tiempo libre compensatorio en la semana siguiente en lugar del pago de horas extras.

En la medida de lo posible, las horas extraordinarias se distribuirán por igual entre todos los empleados por hora en la misma clasificación y puesto, siempre que los empleados por hora en cuestión sean igualmente capaces de realizar el trabajo disponible. Las decisiones sobre el trabajo de horas extras serán tomadas por el supervisor apropiado.

Los supervisores deben proporcionar a un empleado por hora con la mayor antelación posible cuando se requieran horas extras para que el empleado por hora pueda reorganizar su horario para trabajar a la hora solicitada. Por lo general, menos de dos horas no se considera aviso previo adecuado.

Si el director de operaciones no ha autorizado las horas extraordinarias, los supervisores no pueden solicitar a los empleados por hora que trabajen más allá de sus horas programadas regularmente o que acorten su período de comida. Las demandas de los empleados por hora para trabajar cuando las horas extras no han sido autorizadas violan la Ley de Normas Laborales Justas.

## **MANTENIMIENTO DE SUS REGISTROS DE PERSONAL**

Es su responsabilidad proporcionar información actualizada sobre su dirección, número de teléfono, información de contacto de emergencia, beneficiarios del seguro, cambio de dependientes, estado civil, etc. Notifique al Gerente de Recursos Humanos sobre cualquier cambio en su dirección, número de teléfono, información de contacto de emergencia, estado civil, número de dependientes, etc. Los cambios en las exenciones a efectos fiscales solo se realizarán al recibir un formulario W-4 completo.

## **ARCHIVOS DE**

personal Su archivo de personal es propiedad de la Compañía y no le pertenece. Sin embargo, si lo solicita, puede revisar su archivo personal en presencia de Recursos Humanos, siempre que notifique a la Compañía con anticipación razonable. También puede solicitar una copia de cualquier artículo en su archivo personal, y si no está de acuerdo con un artículo en su

archivo, puede responder a ese artículo por escrito. Se puede cobrar una tarifa razonable por las copias. No puede eliminar nada de su archivo personal.

### **DESCRIPCIONES DE TRABAJO**

La Compañía hace todo lo posible para crear y mantener descripciones de trabajo precisas para todos los puestos dentro de la organización. Cada descripción incluye una sección de información del trabajo, una sección de resumen del trabajo (que ofrece una visión general del propósito del trabajo), una sección de deberes y responsabilidades esenciales, una sección de responsabilidades de supervisión, una sección de calificaciones (que incluye educación y / o experiencia, habilidades lingüísticas, matemáticas habilidades, capacidad de razonamiento y cualquier certificación requerida), una sección de demandas físicas y una sección de ambiente de trabajo.

La Compañía mantiene descripciones de trabajo para ayudar a orientar a los nuevos empleados a sus trabajos, identificar los requisitos de cada puesto, establecer criterios de contratación, establecer estándares para las evaluaciones de desempeño de los empleados y establecer una base para hacer adaptaciones razonables para las personas con discapacidades.

La Compañía preparará descripciones de trabajo cuando se creen nuevos puestos. Las descripciones de trabajo existentes también se revisan y revisan para garantizar que estén actualizadas. Las descripciones de trabajo también pueden reescribirse periódicamente para reflejar cualquier cambio en los deberes y responsabilidades del puesto. Se espera que todos los empleados ayuden a garantizar que las descripciones de sus trabajos sean precisas y actuales, reflejando el trabajo que se realiza.

Los empleados deben recordar que las descripciones de trabajo no cubren necesariamente todas las tareas o deberes que se les puedan asignar, y que se pueden asignar responsabilidades adicionales según sea necesario. Póngase en contacto con el Director de Operaciones o Recursos Humanos si tiene alguna pregunta o inquietud sobre la descripción de su trabajo.

### **EVALUACIONES DE DESEMPEÑO**

Los empleados pueden revisar su desempeño laboral después de los primeros 90 días de empleo y anualmente por la Compañía. La Compañía puede realizar evaluaciones con mayor frecuencia según lo considere necesario y apropiado por parte de la administración.

### **TERMINACIÓN DEL EMPLEO**

Los empleados son responsables de todos los bienes, materiales o información escrita de la Compañía que se les haya emitido o que posean o controlen. Los empleados deben devolver toda esa información inmediatamente después de la terminación del empleo.

## **REFERENCIAS / VERIFICACIÓN DE EMPLEO**

Cualquier solicitud de información o referencias del personal debe dirigirse al Gerente de Recursos Humanos. A menos que la Compañía reciba una solicitud por escrito de un empleado que autorice a la Compañía a proporcionar una referencia, es política de la Compañía confirmar solo las fechas de empleo y el puesto que ocupa en respuesta a una solicitud de referencia sobre un empleado actual o anterior de la Compañía. El COO solo puede hacer excepciones a esta política.

La Compañía lo desalienta fuertemente de proporcionar una "referencia personal" en nombre de cualquier empleado, ex empleado o empleado que no sea de la Compañía. Las referencias personales no pueden escribirse en papel con membrete de la Compañía. Cualquier referencia personal que proporcione debe incluir una declaración de que está actuando a título individual y no en nombre de la Compañía.

## **VERIFICACIÓN DE ELEGIBILIDAD DEL EMPLEADO (I-9) LA**

Ley de Control de Inmigración y Reforma de 1986 exige a todos los empleadores que verifiquen que todos los empleados contratados después de noviembre de 1986 están autorizados a trabajar en los Estados Unidos. Esto significa que los nuevos empleados deben presentar documentación que establezca su ciudadanía de los Estados Unidos, su estatus de residente permanente o autorización de trabajo para extranjeros no inmigrantes.

Después de hacer una oferta de empleo y antes de comenzar a trabajar, los empleados deben completar una Verificación de elegibilidad del empleado, el Formulario I-9, y presentar la documentación de verificación apropiada. Todas las ofertas de empleo, y el empleo continuo de personas cuya autorización de empleo es de duración limitada, están condicionadas a que dicho empleado establezca su autorización de trabajo.

## **TARJETA DE IDENTIFICACIÓN DE AGENTE REGISTRADO**

Se archivará una solicitud de una tarjeta de identificación de agente registrada ante la Commonwealth para cada candidato que ofrezca un puesto de trabajo en la Compañía. La solicitud proporcionará, según sea necesario, la siguiente información:

- i. nombre completo, dirección, fecha de nacimiento del candidato;
- ii. Todos los alias utilizados anteriormente o actualmente, incluidos los nombres de soltera;
- iii. Una copia de la licencia de conducir del candidato u otra identificación emitida por el gobierno;
- iv. Certificación de que el individuo no participará en el desvío de productos de marihuana;
- v. Reconocimiento por escrito por el candidato de cualquier limitación en su autorización para cultivar, cosechar, preparar, empaquetar, poseer, transportar y dispensar marihuana en el Estado Libre Asociado;
- vi. Información de antecedentes que incluye lo siguiente:



- a. Descripción y fechas de cualquier acción criminal que ocurrió en cualquier jurisdicción que resultó en una condena, declaración de culpabilidad, declaración de nolo contendere o admisión de hechos suficientes;
- b. Description and dates of any civil or administrative action that occurred in any jurisdiction relating to any professional, occupational or fraudulent practices;
- c. Description and dates of any past or pending action on a license that occurred or is occurring in any jurisdiction; and
- d. Description and dates of any past or pending disciplinary action or unresolved complaint that occurred or is occurring in any jurisdiction.

### **CRIMINAL OFFENDER RECORD INFORMATION (CORI) REPORT**

The Company is required to obtain a Criminal Offender Record Information (“CORI”) report for each employee within 30 days prior to the submission of his/her application for a registered agent identification card.

This information will be used to fill out the background check information for criminal actions for each application for a registered agent identification card.

CORI reports will be stored securely and kept confidential. They will, however, be subject to review by the Commission investigators on request.

CORI reports are only valid for one year from the date they are generated. New CORI reports must be obtained, for all employees prior to the one-year anniversary of the last report that was generated.

### **BACKGROUND CHECKS**

In order to obtain a required registered agent identification card, the Company will conduct background checks on all candidates offered positions of employment. The Company may also conduct a background check on any current employee if the Company has cause to believe that a background check is warranted.

Background checks will be conducted in compliance with federal and state law by a reputable third party consumer reporting agency. Information obtained through a background check will be kept separate from the employee's regular personnel file and will be maintained in strict confidence.

The background check generally will include a review of information from an individual's previous employer(s), educational institutions, law enforcement agencies at the federal, state and county levels; and in some cases credit reporting agencies. Background checks may include but are not limited to the following:

- i. Review of criminal records,
- ii. Verification of social security number,
- iii. Verification of educational records,

- iv. Verification of employment records, and
- v. Sexual offender registry search.

For new hires, background checks ordinarily will be processed at the time a conditional offer of employment is made.

In each case in which a background check will be performed, the individual will be asked to complete and sign a release authorizing the third-party vendor to conduct the background check. If the individual fails to sign the release, any offer for employment will be rescinded, and any current employment with the Company may be terminated.

Background check reports will be obtained and reviewed by Human Resources, who may review the information with the appropriate member of senior staff, the Company's legal counsel, or others with a need to know.

If an individual is denied employment due, wholly or in part, to information obtained in a background check, he/she will be so informed in advance of any adverse action. In addition, where required by law and to the extent applicable, the individual will be given (a) a copy of the relevant background check report, (b) a summary of the individual's legal rights concerning the background check report, and (c) the name, address and phone number of the third-party vendor if the individual has questions about the results of the report or wants to dispute the accuracy of the report. It is important to note, however, that the vendor does not make employment decisions and will be unable to provide any individual with specific reasons as to why the adverse action was taken.

## **STANDARDS AND EXPECTATIONS FOR THE WORKPLACE**

### **SAFETY**

The Company believes in maintaining safe and healthy working conditions for our employees. However, to achieve our goal of providing a safe workplace, each employee must be safety conscious. We have established the following policies and procedures that allow us to provide safe and healthy working conditions. We expect each employee to follow these policies and procedures, to act safely, and to report unsafe conditions to the COO in a timely manner.

The Company provides information to employees about workplace safety and health issues through regular internal communication channels such as supervisor-employee meetings, bulletin board postings, memos, or other written communications. The Safety Committee, which is composed of representatives from throughout the organization, has been established to help monitor the Company's safety program and to facilitate effective communication between employees and management about workplace safety and health issues. The Safety Committee has responsibility for implementing, administering, monitoring, and evaluating the safety program. Its success depends on the alertness and personal commitment of all.

Employees and supervisors receive periodic workplace safety training. The training

covers potential safety and health hazards and safe work practices and procedures to eliminate or minimize hazards.

Some of the best safety improvement ideas come from employees. Those with ideas, concerns, or suggestions for improved safety in the workplace are encouraged to raise them with their supervisor, or with another supervisor or manager, or bring them to the attention of a member of the labor-management safety committee. Reports and concerns about workplace safety issues may be made anonymously if the employee wishes. All reports can be made without fear of reprisal.

### *Reporting Unsafe Conditions or Practices*

Employees are expected to be on the lookout for unsafe working conditions or practices, regardless of how insignificant the injury may appear. If you observe an unsafe working condition, you should warn others, if possible, and report that unsafe working condition to the COO immediately. If you have a question regarding the safety of your workplace and practices, ask the COO for additional information.

If you observe a co-worker using an unsafe practice, you are expected to mention this to the co-worker and to the COO. Likewise, if a co-worker brings to your attention an unsafe practice you may be using, please thank the co-worker and make any necessary adjustments to what you are doing. Safety at work is a team effort.

The Company will not retaliate against an employee who reports an unsafe working condition. This is important because one goal of the Company is to provide a safe and appropriate workplace.

### **VISITORS IN THE WORKPLACE**

To provide for the safety and security of employees and the facilities at the Company, only authorized visitors are allowed in the workplace. Restricting unauthorized visitors helps maintain safety standards, protects against theft, ensures security of equipment, protects confidential information, safeguards employee welfare, and avoids potential distractions and disturbances.

Because of safety and security reasons, family and friends of employees are discouraged from visiting. In cases of emergency, employees will be called to meet any visitor outside their work area.

If an unauthorized individual is observed on the Company's premises, employees should immediately notify their supervisor or, if necessary, direct the individual to the office.

### **MAINTAINING A SAFE WORKSITE**

We expect employees to establish and maintain a safe worksite. This includes but is not limited to the following:

- i. Wear appropriate safety gear at all times.
- ii. Wear appropriate clothing around or while operating machinery.
- iii. Handle tools and machinery with care and respect.
- iv. Refrain from using cell phones, MP3 players or other electronic devices while handling Company machinery or vehicles or working in the factory.
- v. Refrain from horseplay and practical jokes in the workplace.
- vi. Never operate Company machinery or vehicles while intoxicated or taking medications that impair your judgment.
- vii. Never tamper with or use equipment in an unauthorized manner.
- viii. Employees may not chew gum or eat candy or food while working in production.
- ix. Employees working in production must wear a hairnet, gloves, proper boots, a clean apron, and any other clothing that the Company deems to be appropriate at all times.

Employees can prevent accidents and contribute to a safe work environment by carefully examining their equipment to see if it is in good working order on a routine basis, and report any needed repairs.

#### **REPORTING AN INJURY**

Employees are required to report any injury, accident, or safety hazard immediately to the COO. Minor cuts or abrasions must be treated on the spot. More serious injuries or accidents will be treated accordingly. Serious injuries must be reported on the injury or accident report form available in the main office. A digital accident report is available online on the company forms site at [253organicforms.com](http://253organicforms.com) pw: 253

#### **FIRST AID**

Only those employees certified to provide first aid may provide first aid.

#### **CARE OF EQUIPMENT AND SUPPLIES**

All employees are expected to take care of all equipment (*eg.*, tools, computers, cell phones, etc.) and supplies provided to them. You are responsible for maintaining any equipment provided to you in proper working condition and for promptly reporting any problems with the equipment to the COO.

If employees find that equipment is not working properly or in any way appears unsafe, they must notify their supervisor immediately so that repairs or adjustments may be made. Under no circumstances should employees start or operate equipment that they deem unsafe, nor should they adjust or modify the safeguards provided.

Delivery drivers are expected to make a daily visual inspection of the vehicles and to promptly report any damage to the vehicle. The drivers must also maintain the cleanliness of the inside and outside of the vehicle. The drivers must report any accident or incident immediately.

Neglect, theft, and/or destruction of the Company's equipment are grounds for disciplinary action, up to and including termination of employment.

### **SMOKING AT THE WORKPLACE**

The Company's policy is to provide smoke-free environments for our employees, customers and visitors. Smoking of any kind is prohibited inside our buildings. Employees may smoke on scheduled breaks or during meal times, as long as they do so in designated areas. Smoking breaks must be limited to 3 times daily. Employees who take excessive smoke breaks may be required to work longer hours to make up for time lost smoking.

### **VIOLENCE AND WEAPONS**

The Company believes in maintaining a safe and healthy workplace, in part by promoting open, friendly, and supportive working relationships among all employees. Violence or threats of violence have no place in our business. Violence is not an effective solution to any problem. Employees are strictly prohibited from bringing any weapons, including knives, pistols, rifles, stun guns, Mace, etc., to work. Conduct that threatens, intimidates or coerces another employee, a customer or a member of the public at any time, including off-duty periods, will also not be tolerated. Furthermore, if you have a problem that is creating stress or otherwise making you agitated, you are encouraged to discuss it with the COO or the Human Resources Manager.

You are expected to immediately report to the COO any violation of this policy. Any employee found threatening another employee (directly or indirectly), fighting, and/or carrying weapons to work will be subject to disciplinary action, up to and including termination of employment.

### **DRUG-FREE WORKPLACE**

The Company does not tolerate the presence of illegal drugs or the illegal use of legal drugs in our workplace. The use, possession, distribution, or sale of controlled substances such as drugs or alcohol, or being under the influence of such controlled substances is strictly prohibited while on the Company's premises or while visiting customers. The use of illegal drugs as well as the illegal use of legal drugs is a threat to everyone because it can cause problems with safety, customer service, productivity, and our ability to survive and prosper as a business. If you need to take a prescription drug that affects your ability to perform your job duties, you are required to discuss possible accommodations with the COO. Violation of this policy will result in disciplinary action, up to and including termination of employment.

To help ensure a safe and healthful working environment, job applicants and employees may be asked to provide body substance samples (such as urine and/or blood) to determine the illicit or illegal use of drugs and alcohol. Refusal to submit to drug testing may result in disciplinary action, up to and including termination of employment. Questions concerning this policy or its administration should be directed to the COO. Nothing in this section shall be read to override any protections provided to employees by The Regulation and Taxation of Marijuana

Act, as amended by St. 2017,c.55, An Act To Ensure Safe Access To Marijuana, with which the Company will comply fully and recognize all associated employee rights.

Any employee who is convicted of violating criminal drug statutes must notify the COO or HR of that conviction within five days of the conviction. Failure to do so may lead to disciplinary action.

**Your receipt of this policy statement and signature on the handbook acknowledgment form signify your agreement to comply with this policy.**

### **RESPONDING TO CUSTOMER INQUIRIES AND PROBLEMS**

At the Company, customer satisfaction is the measure of our success. It is the responsibility of each employee who interacts with customers to respond to customer's inquiries and problems in a professional and courteous manner.

### **APPEARANCE AND DRESS**

In order to maintain a clean and safe working environment, all employees are required to wear appropriate clothing on the job.

Employees should always be neatly groomed and clothes should be clean and in good repair.

Your supervisor or department head is responsible for establishing a reasonable dress code appropriate to the job you perform. If your supervisor feels your personal appearance is inappropriate, you may be asked to leave the workplace until you are properly dressed or groomed. Under such circumstance, you will not be compensated for the time away from work. Consult your supervisor if you have questions as to what constitutes appropriate appearance. Where necessary, reasonable accommodation may be made to a person with a disability.

Without unduly restricting individual tastes, the following personal appearance guidelines should be followed:

- i. Shoes must provide safe, secure footing, and offer protection against hazards.
- ii. Tank tops, tube or halter tops, may not be worn under any circumstances.
- iii. Hairstyles are expected to be clean and in good taste.
- iv. No facial piercings such as nose rings, eyebrow piercings, lip rings, etc. are allowed.
- v. No jewelry or nail polish while working in production.

### **CONFLICTS OF INTEREST**

You should avoid external business, financial, or employment interests that conflict with the Company's business interests or with your ability to perform your job duties. This applies to your possible relationships with any other employer, customer, or business associate.



This policy establishes only the framework within which the Company wishes the business to operate. The purpose of these guidelines is to provide general direction so that employees can seek further clarification on issues related to the subject of acceptable standards of operation. Contact the Human Resources Department for more information or questions about conflicts of interest.

An actual or potential conflict of interest occurs both when an employee's responsibility of loyalty to the Company is compromised by the employee's outside interests and when an employee's influence over a decision may result in a personal gain for that employee or for a relative, friend, or other person with whom the employee has a personal relationship as a result of the Company's business dealings. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

Transactions with outside firms must be conducted within a framework established and controlled by the executive level of the Company. Business dealings with outside firms should not result in unusual gains for those firms. Unusual gain refers to bribes, product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit either the employer, the employee, or both.

Personal gain may result not only in cases where an employee or relative has a significant ownership in a firm with which the Company does business, but also when an employee or relative receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving the Company.

No "presumption of guilt" is created by the mere existence of a relationship with outside firms. However, if employees have any influence on transactions involving purchases, contracts, or leases, it is imperative that they disclose to an officer of the Company as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.

Violations of this rule may lead to disciplinary action, up to and including termination of employment.

### **CODE OF ETHICAL CONDUCT**

To ensure the successful business operation of the Company, we expect that all of our employees will conduct themselves fairly and ethically. The Company's reputation for integrity and excellence requires that our employees carefully observe the spirit and letter of all applicable laws and regulations and at all times exhibit a scrupulous regard for the highest standards of conduct and personal integrity.

The Company's success is dependent upon its outstanding reputation which we are dedicated to preserving. Employees owe a duty to the Company and its principals to act in a way that will merit the excellent reputation enjoyed by the Company.

The Company will comply with all applicable laws and regulations and expects its directors, officers, and employees to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest or unethical conduct, conflicts of interest, as discussed below are strictly prohibited.

In order to avoid any appearance of a conflict of interest, employees are expected to abide by the following code of ethical conduct. Please consult the COO if you have any questions.

Employees of the Company should not solicit anything of value from any person or organization who has (or may have) a business relationship with the Company.

Employees of the Company should not accept any item of value from any person or organization in exchange for or in connection with a business transaction between the Company and that other person or organization.

Employees may accept items of incidental value (generally, no more than \$25) from customers, suppliers, or others as long as the gift is not given in response to solicitation on your part and as long as it implies no exchange for business purposes. Items may include gifts, gratuities, food, drink and entertainment.

If you are faced with and are unsure how to handle a situation that you believe has the potential to violate this code of ethical conduct, notify the COO.

Violations of this code may lead to disciplinary action, up to and including termination of employment.

#### **SOLICITATION AND DISTRIBUTION**

For the safety, convenience, and protection of all employees, the Company prohibits solicitation and distribution of non-company materials on Company property at all times.

#### **PERSONAL CALLS, VISITS, AND BUSINESS**

The Company expects the full attention of its employees while they are working. Although employees may occasionally have to take care of personal matters during the workday, employees should try to conduct such personal business either before or after their scheduled work shift or during breaks or meal periods. Regardless of when any personal call is made, it should be kept short.

Employees should also limit incoming personal calls, visits, or personal transactions. A pattern of excessive personal phone calls, personal visits, and/or private business dealings during work hours is not acceptable and may lead to disciplinary action.

## **BUSINESS EXPENSES**

Employees may occasionally incur expenses on behalf of the Company. Employees must receive prior written approval from the COO or the Human Resources Manager. The Company will reimburse employees for typical business expenses, such as mileage (*eg*, travel to visit a customer during the workday) and certain job-related supplies or materials. The Company will pay mileage reimbursements at the end of each month, upon receipt of the employee's mileage record. In order to be reimbursed for job-related supplies or materials, you must deliver a receipt for the supplies or materials to the Human Resources Manager within 7 days of the purchase.

## **PERSONAL PROPERTY**

Personal items should not be stored or kept in Company desks, lockers or files. The Company will not be responsible for the loss or theft of personal items at its facilities, and employees should have no expectation that documents, photographs, or other items left on Company property will remain private.

## **INSPECTION OF PERSONAL AND COMPANY PROPERTY**

The Company's employees use the property and equipment the Company owns and provides, and may also use the Company's materials, information, and other supplies. You must remember that property supplied by the Company remains the property of the Company. The Company reserves the right to search any Company property (*eg*, cell phones, desks, or other storage areas) at any time. The Company also reserves the right to inspect personal property (*eg*, purses and knapsacks) during the workday or as employees leave the office. Refusal to allow inspection may lead to disciplinary action, up to and including termination of employment.

## **SECURITY POLICY**

The Security Policy protects Protected Personal Information as defined in the Massachusetts Data Security Law. Protected Personal Information is an individual's first name and last name or first initial and last name in combination with any one or more of the following data elements that relate to such individual:

- i. Social security number,
- ii. Driver's license number or state-issued identification card number, or
- iii. Financial account number, or credit card or debit card number, with or without any required security code, access code, personal identification number or password that would permit access to such individual's financial account (*eg.*, checking account numbers, savings account numbers, etc.).

Protected Personal Information does not include information that is lawfully obtained from publically available information, or from federal, state or local government records lawfully made available to the general public.

*Security Officer*

The Company has named Seth Rutherford as the Security Officer with the overall responsibility for the development, implementation, maintenance and supervision of security policies that conform to the Massachusetts Data Security Law. The Security Officer must ensure the confidentiality, integrity and availability of all electronic Protected Personal Information that the Company creates, receives, maintains or transmits; protect against any reasonably anticipated threats or hazards to the security or integrity of electronic Protected Personal Information; protect against any reasonably anticipated uses or disclosures of electronic Protected Personal Information that are not permitted or required; ensure compliance with the Massachusetts Data Security Law.

The Security Officer is responsible for ensuring that the Company:

- i. Complies with Massachusetts Data Security Law,
- ii. Develops and implements security policies and procedures that comply with federal and state law,
- iii. Maintains the confidentiality of Protected Personal Information created or received by the Company from the date such information is created or received until it is destroyed,
- iv. Tests security safeguards on a routine basis,
- v. Reviews the scope of the security measures at least annually, or whenever there is a material change in the Company's business practices that may implicate the security or integrity of records containing Protected Personal Information, and
- vi. Provides the appropriate level of training for all employees, as required.

#### *Internal Security*

To combat internal risks to security, confidentiality and/or integrity of any electronic, paper or other records containing Protected Personal Information, and evaluating and improving, where necessary, the effectiveness of the current safeguards for limiting such risks, the following measures are mandatory and effective immediately.

- i. A copy of this Security Policy must be distributed to all employees, who, upon receipt, must acknowledge in writing that he/she has received a copy.
- ii. Employment contracts and/or confidentiality agreements must contain provisions requiring employees to comply with this Security Policy and to prohibit any nonconforming use of Protected Personal Information during or after employment; with mandatory disciplinary action to be taken for any violation of this Security Policy. Violations may result in disciplinary action, up to and including termination of employment, assignment, or association with the Company. Such disciplinary action shall take into account the severity of the violation and the number of violations.
- iii. The amount of Protected Personal Information must be limited to the minimum amount needed for legitimate business purposes, or to comply with the Company's privacy policies and procedures, and federal and state regulations.

- iv. Access to records containing Protected Personal Information must be limited to those persons who need to have access to such information for legitimate business purposes or to comply with the Company's privacy policies and procedures, and federal and state regulations.
- v. Electronic access to user identification after multiple unsuccessful attempts to gain access must be blocked.
- vi. All security measures must be reviewed annually, or whenever there is a material change in the Company's business practices that may reasonably implicate the security or integrity of records containing Protected Personal Information. The Security Officer is responsible for this review and any recommendation for improved security arising out of that review.
- vii. Terminated employees must return all records containing Protected Personal Information, in any form, that may at the time of such termination be in the former employee's possession (including all such information stored on laptops or other portable devices or media, and in files, records, work papers, etc.).
- viii. A terminated employee's physical and electronic access to Protected Personal Information must be blocked immediately. Such terminated employee shall be required to surrender all keys, IDs, access cards or badges, business cards, etc., that permit access to the Company's premises or information. Moreover, such terminated employee's remote electronic access, e-mail access, internet access, and passwords must be invalidated. The Security Officer shall maintain a highly secured master list of all lock combinations, passwords and keys.
- ix. Current employees' IDs and passwords must be changed periodically. Passwords must contain at least one alpha character, one numeric character and one symbol.
- x. Access to Protected Personal Information shall be restricted to active uses and active user accounts only.
- xi. Employees must immediately report any suspicious or unauthorized use of Protected Personal Information to the Security Officer.
- xii. Whenever there is a Security Breach requiring notification in accordance with the Massachusetts Data Security Law, there shall be an immediate mandatory post-incident review of events and actions taken, if any, with a view to determining whether any changes in the Company's security practices is required to improve the security of Protected Personal Information.
- xiii. Employees may not keep open files containing Protected Personal Information on their desks when they are not at their desks. Employees may not store Company files on personal computers or keep client files offsite.
- xiv. At the end of each work day, all files and other records containing Protected Personal Information must be secured in a manner that is consistent with the Company's privacy policies and procedures, and federal and state law. For example, materials should not be left in open spaces such as administrative assistants' desks. Also, employees must log off computers at the end of each working day.
- xv. The Company shall develop rules (bearing in mind its business needs) that ensure that reasonable restrictions upon physical access to records containing Protected Personal Information are in place, including a written procedure that sets forth the manner in which physical access to such records is restricted; and the Company

- must store such records and data in locked facilities; secure storage areas or locked containers.
- xvi. Access to electronically stored Protected Personal Information shall be electronically limited to those employees having a unique log-in ID; and re-log-in shall be required when a computer has been inactive for more than a few minutes.
  - xvii. Visitors' access to the Company's offices must be restricted. Visitors may not be allowed to wander freely through the Company's offices. Whenever possible, employees should meet with visitors in a secure confidential space when conversations may involve Protected Personal Information. From time to time vendors are allowed free access to the Company's office. Employees should not conduct conversation regarding business matters when such visitors are present unless necessary.
  - xviii. Paper or electronic records (including records stored on hard drives or other electronic media) containing Protected Personal Information shall be disposed of only in a manner that complies with MGLc 93I (*eg.*, paper documents should be shredded prior to disposal).
  - xix. Paper or electronic records (including records stored on hard drives or other electronic media) containing and/or Protected Personal Information shall be retained in a manner that complies with business practices, Federal and State laws.
  - xx. To ensure system compatibility and the security of electronic information, employees may not install or modify software on any computer provided or owned by the Company unless express prior approval is provided by the Company. This approval must be obtained for each installation or service.
  - xxi. To ensure that services provide appropriate security measures and that affected equipment can be safeguarded to avoid the downloading of computer viruses, express prior permission must be obtained from the Company before subscribing to, or using, any program that accesses information from external sources, including the use of any communications software, accessing any bulletin board or online service or use of the Internet.
  - xxii. Employees may not use password protection or encryption (coding) software or similar protections on any system or file without express prior approval from the Company. Where permission is provided, the password must be provided to the Security Officer. The use of any type of encryption scheme or password, whether or not authorized, in no manner restricts the Company's rights to monitor use of Company -provided technologies (see Technology Policy).
  - xxiii. Where passwords and sign-on codes are in place, users may not share their passwords except to the extent required to comply with this Security Policy. Passwords should be guarded and not written or accessible on or near the equipment. Users who have access to the Company's systems through remote technology should take special precautions to ensure that their equipment is not used in an unauthorized manner or by unauthorized individuals.
  - xxiv. Whenever information is provided to anyone outside the Company's location in electronic form, such information must be encrypted and/or password protected.



- xxv. Employees who log into the Company's systems by way of a wireless communication must be securely configured and certified by an IT Specialist. If a user has any questions, he or she should contact IT.

### *External Security*

To combat external risks to security, confidentiality and/or integrity of any electronic paper or other records containing Protected Personal Information, and evaluating and improving, where necessary, the effectiveness of the current safeguards for limiting such risks, the following measures are mandatory and are effective immediately.

- i. There must be reasonably up-to-date firewall protection and operating system security patches, reasonably designed to maintain the integrity of the personal information, installed on all systems processing Protected Personal Information.
- ii. There must be reasonably up-to-date versions of system security agent software which must include malware protection and reasonably up-to-date patches and virus definitions, installed on all systems processing Protected Personal Information.
- iii. To the extent technically feasible, all personal information stored on laptops or other portable devices must be encrypted, as must all records and files transmitted across public networks or wirelessly, to the extent technically feasible. Encryption here means the transformation of data into a form in which meaning cannot be assigned without the use of a confidential process or key, unless further defined by regulation by the Massachusetts Office of Consumer Affairs and Business Regulation.
- iv. All computer systems must be monitored for unauthorized use of or access to personal information.
- v. There must be secure user authentication protocols in place, including: (a) protocols for control of user IDs and other identifiers; (b) a reasonably secure method of assigning and selecting passwords, or use of unique identifier technologies, such as biometrics or token devices; (c) control of data security passwords to ensure that such passwords are kept in a secure location.

### *Reporting Security Breaches*

The Company will mitigate any harm caused by unauthorized disclosures of Protected Personal Information and will notify affected clients and individuals when security breaches occur.

When an employee of the Company knows or has reason to know (1) of a Security Breach, or (2) that the Protected Personal Information was acquired or used by an unauthorized person or for an unauthorized purpose, that employee must notify the Security Officer immediately. The Security Officer will notify the Attorney General and the Office of Consumer Affairs and Business Regulation of that breach or unauthorized acquisition or use.

A "Security Breach" is the unauthorized acquisition or unauthorized use of unencrypted

data or, encrypted electronic data and the confidential process or key that is capable of compromising the security, confidentiality, or integrity of Protected Personal Information, maintained by the Company that creates a substantial risk of identity theft or fraud against an individual. A good faith but unauthorized acquisition of personal information by a person or agency, or employee or agent, for the lawful purposes of such person or agency, is not a Security Breach unless the Protected Personal Information is used in an unauthorized manner or subject to further unauthorized disclosure.

“Encrypted” is defined as the transformation of data through the use of a 128-bit or higher algorithmic process into a form in which there is a low probability of assigning meaning without use of a confidential process or key, unless further defined by regulation of the Department of Consumer Affairs and Business Regulation.

### *Training*

The Security Officer (or his/her designee) will provide training for all employees who use or disclose Protected Personal Information. Furthermore, the Security Officer (or his/her designee) will provide annual training for all managers, employees, and independent contractors, including temporary and contract employees, who have access to Protected Personal Information on the elements of this Security Policy with the appropriate level of security training as required. All attendees at such training sessions are required to certify their attendance at the training and their familiarity with the Company's requirements for ensuring the protection of Protected Personal Information.

### *Responsibility and Disciplinary Actions*

Each eligible employee has a duty to the Company to comply with the terms and conditions of this Security Policy. Any violations of this Security Policy must be reported to the Company or Security Officer.

Violations are subject to disciplinary action, up to and including termination of employment. Disciplinary action will be based on the severity of the violation(s) and the number of violations.

If any employee has a question with regard to this Security Policy, he or she should consult privately and confidentially with the Security Officer.

## **TECHNOLOGY POLICY**

253 Organic, LLC provides certain employees with computer and telephone equipment and a variety of technologies, including the capability to send or receive voice mail and electronic mail (“E-mail”) and access to several online services and other external resources. Unauthorized use of telephone and computer equipment can threaten the ability of these systems to operate properly and potentially subject the user and the Company to certain liabilities.

All messages created, sent or retrieved over the Company's computer and telephone

equipment are the sole property of the Company and not the employees. The Company reserves the right to access, search, inspect, copy, delete and disclose any message, communication or file on any voice mail, e-mail or computer system owned or operated by the Company at any time or for any reason. The Company also reserves the right to access, search, inspect, copy, delete and disclose any file stored in any electronic form or any other medium located on Company property or kept with files or equipment that belong to or are provided by the Company at any time for any reason. The Company may also monitor telephone calls to assure quality. All equipment, software, files, disks, diskettes, communications or messages created, maintained or sent or received on any system or storage device provided by the Company are considered Company property.

Confidential information and trade secrets of the Company are not to be disclosed to any third person in any manner whatsoever, including without limitation, by electronic means, under any circumstances. Further, because cell phones, e-mail and voice mail are not completely secure, the utmost discretion should be used before sending and storing confidential or sensitive information, and, if at all possible, the most secure mode of transmission and storage should be used in accordance with the Company's Security Policy. If there are questions regarding which mode, of transmission is appropriate, please contact the Security Officer.

Employees may not use the Company's equipment to send or receive messages in violation of federal or state law, in violation of Company policy (*eg.*, the Security Policy), in violation of the intellectual or other property right or interest of another or in any inappropriate, discriminatory or unauthorized manner. As an example and not by way of limitation, messages that are profane, vulgar, harassing, defamatory or promote a user's personal beliefs on non-business issues are prohibited. Use of Company -provided resources in violation of this policy will result in disciplinary action, up to and including termination. The Company, in its sole discretion, may advise appropriate law enforcement officials of any suspected violations of law without the prior consent of the sender or receiver of a communication or any other person.

### **CONFIDENTIAL AND PROPRIETARY INFORMATION**

The Company considers its confidential and proprietary information and trade secrets, including the confidential and proprietary information and trade secrets of our customers, to be one of its most valuable assets. As a result, employees must carefully protect and must not disclose to any other party at any time (including after any termination of employment) any confidential and proprietary information and trade secrets belonging to the Company or its customers except to the extent necessary to perform your duties for the Company or its clients or with the prior written consent of the COO. Such protected information includes, but is not limited to, the following examples:

- i. Personal or financial information regarding the principals, officers, directors or managers and their affiliated and/or related entities,
- ii. Personnel information
- iii. Any information relating to individuals, businesses or other entities which the Company has established a business or working relationship,
- iv. Customer or vendor lists and information,

- v. Financial information,
- vi. Business strategies,
- vii. Marketing strategies,
- viii. Contemplated or pending projects,
- ix. Proprietary business processes,
- x. Development and acquisition plans,
- xi. Research and development strategies,
- xii. Formulas, recipes, and product ingredients, and
- xiii. Any other proprietary information whether communicated orally or in documentary, computerized or other tangible form, concerning the Company's or its clients' operations and business.

The removal of materials, documents, files, records and other property belonging to the Company from the premises is not encouraged. However, if you must do so, please remember that confidential and proprietary information and trade secrets must be safeguarded at all times. Any electronic files you access remotely must also be safeguarded at all times.

Employees should ensure that any materials containing confidential or proprietary information are filed and/or locked up before leaving their work areas each day. During the workday, employees should not leave any sensitive information lying about or unguarded.

Employees who improperly use or disclose trade secrets, confidential or proprietary business information will be subject to disciplinary action, up to and including termination of employment, even if they do not actually benefit from the disclosed information. Neither these guidelines nor any terms set forth in a nondisclosure agreement shall be limiting to the other. Rather, each shall be construed broadly so as to compliment each other to provide the broadest protection for the Company's activities.

All Company property, including any materials containing confidential information, must be surrendered immediately upon notice of termination or demand.

If you have any questions about this policy, consult the COO.

#### **RULES OF CONDUCT AND PROGRESSIVE DISCIPLINARY PROCEDURE**

There are reasonable rules of conduct which must be followed in any organization to help a group of people work together effectively. The Company expects each employee to present himself or herself in a professional appearance and manner. If an employee is not respectful and considerate of others and does not observe reasonable work rules, disciplinary action will be taken.

Depending on the severity or frequency of the disciplinary problems, a verbal or written reprimand, suspension without pay, disciplinary probation, or discharge may be necessary. It is within the Company's sole discretion to select the appropriate disciplinary action to be taken. Notwithstanding the availability of the various disciplinary options, the Company reserves the

right to terminate an individual's employment with the Company at its discretion, with or without notice.

The following is not a complete list of infractions for which an employee may be subject to discipline, but it is an example of those infractions that may result in immediate discipline, up to and including termination of employment, for a single offense:

- i. Excessive absenteeism (or absence without notice) or lateness (or lateness without notice).
- ii. Unsatisfactory performance or conduct.
- iii. Smoking anywhere on the property.
- iv. Chewing gum and/or eating in areas of the property where it is prohibited such as on the production floor.
- v. Use of cell phones for any purpose while working.
- vi. Dishonesty, including falsification of timecards and other Company-related documents, or misrepresentation of any fact.
- vii. Fighting, disorderly conduct, horseplay, or any other behavior which is dangerous or disruptive.
- viii. Cursing in the workplace.
- ix. Possession of, consumption of, or being under the influence of alcoholic beverages while on Company or customer premises or on Company business.
- x. Illegal manufacture, distribution, dispensation, sale, possession, or use of illegal drugs or unprescribed controlled substances.
- xi. Reporting for work with illegal drugs or unprescribed controlled substances in your body.
- xii. Possession of weapons, firearms, ammunition, explosives, or fireworks on Company premises (including parking areas) or customer premises.
- xiii. Failure to promptly report a workplace injury or accident involving any of the Company's employees, visitors, equipment, vehicles, or property.
- xiv. Commission of a crime, or other conduct which may damage the reputation of Company.
- xv. Use of profane language while on Company business.
- xvi. Stealing, misappropriating, or intentionally damaging property belonging to the Company or its visitors or employees.
- xvii. Unauthorized use of the Company's or its customers' name, funds, equipment, or property, including telephone, mail system or other employer-owned equipment.
- xviii. Insubordination, including failure to comply with any work assignments or instructions given by any Company employee with the authority to do so unless such assignment or instruction violates Company policies or federal or state law.
- xix. Violation of the Company's Equal Employment Opportunity Policy or its Harassment Policy.
- xx. Interference with the work performance of other employees.
- xxi. Failure to utilize Company machinery or equipment in accordance with the manufacturer's specifications.
- xxii. Failure to cooperate with an internal investigation, including, but not limited to, investigations of violations of these work rules.

- xxiii. Failure to maintain the confidentiality of proprietary information belonging to the Company or its customers.
- xxiv. Failure to comply with the Company's personnel policies and rules.
- xxv. Disqualification or expiration of Registered Agent Identification Card.

### **RE-EMPLOYMENT**

As a general rule, the Company will not rehire former employees who:

- i. Were dismissed by the Company;
- ii. Resigned without giving two weeks' notice;
- iii. Were dismissed for inability to perform job duties;
- iv. Had a poor attendance record; or
- v. Violated work rules or safety rules.

### **MOONLIGHTING/DAYLIGHTING**

The Company discourages our employees from taking additional outside employment. Employees who wish to take on outside employment must first obtain permission from the COO. Work requirements for the Company, including overtime, must take precedence over any outside employment.

The Company will not permit any employee to take an outside job with an employer in the same or related business as the Company, or which is in any way a competitor of the Company. Employees are not permitted to work for any customer of the Company outside of the regular working hours.

If the Company permits an employee to take outside employment, the employee must report to the COO when the outside job has started. If you are unable to work when requested by the Company (including overtime), or unable to maintain a high work performance level at the Company, permission to work at the outside job may be rescinded, or your employment with the Company may be terminated.

Employees are expected to be engaged in services and activities for the Company while at work. You may not engage in outside activities during working hours (*ie*, daylighting).

## **BENEFITS**

### **WORKERS' COMPENSATION BENEFITS**

The Company purchases workers' compensation insurance for employees who suffer accidental injuries or occupational diseases arising out of and in the course of employment. Benefit coverage and medical payments will be in accordance with the requirements of the Massachusetts Workers' Compensation law.



In the event of an accident or injury, you must notify the COO immediately, no matter how minor the incident or accident may appear. Depending on the severity of the injury, the injured employee may be referred to an emergency room or a local clinic.

If you are injured, you must complete the necessary accident/incident reports within 24 hours of the injury. The Company reserves the right to require that you be tested for the presence of drugs or alcohol after any accident.

### **VACATION TIME**

The Company provides its full-time employees with vacation time each year as a way to express our appreciation and a way to renew and refresh our employees. Because our business can experience strict deadlines on projects, the Company reserves the right to grant vacations at times that are most suitable for our business conditions and to limit vacations during our busy times.

To qualify for vacation, a full time employee must complete 90 days of continuous employment.

If you are a full-time employee hired:	You may use up to:
Prior to the current calendar year	40 hours of vacation between January 1 and December 31.
Between January 1 and June 30 of the current calendar year	40 hours of paid vacation between your date of hire and December 31.
Between July 1 and September 30 of the current calendar year	20 hours of vacation between your date of hire and December 31.
Between October 1 and December of the current calendar year	0 hours of vacation between your date of hire and December 31.

Employees must use all vacation in the calendar year in which it is granted. It should be scheduled and approved by the Human Resources Manager at least two weeks in advance. Any unused vacation will be forfeited at the end of each calendar year. The Human Resources Manager may at his/her discretion allow employees to carry over unused vacation into a subsequent calendar year.

Upon termination of employment for any reason, employees are paid for any accrued but unused vacation during that calendar year.

Part-time, temporary and seasonal employees are not eligible for vacation.

### **SICK TIME**

After a period of employment of 90 days of continuous employment, employees are entitled to 40 hours of paid Sick / Personal Leave for the care and treatment of themselves or a family member.

The state authorized use of sick time is as follows:

- To care for the employee's child, spouse, parent, or parent of a spouse, who suffers from a physical or mental illness, injury, or medical condition that requires home care, professional medical diagnosis or care, or preventative medical care;
- To care for the employee's own physical or mental illness, injury, or medical condition that requires home care, professional medical diagnosis or care, or preventative medical care;
- To attend regular medical appointments for the employee or the employee's child, spouse, parent, or parent of a spouse;
- To address the psychological, physical, or legal effects of domestic violence; and
- To travel to and from an appointment, a pharmacy, or other location related to the purpose for sick leave was taken.

253 Organic, LLC would like to allow flexibility for our employees to use this time for unforeseen circumstances other than illness. We understand that there are sometimes non-medical family emergencies, and non-medical appointments that need to be addressed. Employees must understand, however, that if they use this time for non-medical occurrences, they are taking the chance of exhausting their sick time for the future.

The flexibility in this policy is not intended to be used as an extension of the vacation policy. People using their vacation time will not be granted preplanned use of Sick/Personal Leave immediately before or after a scheduled vacation.

If the need is foreseeable, the employee should provide 7 days advance notice of their intention to use Sick / Personal Leave. If the need is not foreseeable, the employee must notify his/her supervisor as soon as practicable. Calling or texting a co-worker is not appropriate notification.

Any unused Sick / Personal Leave will be paid out to employees on December 31<sup>st</sup> of each year and a fresh benefit of 40 hours will be applied to payroll accruals on January 1<sup>st</sup>.

Upon termination of employment for any reason, employees are not paid for any accrued but unused sick leave.

### **LEAVES OF ABSENCE**

#### *Parental Leave*

Parents, who have completed at least ninety (90) consecutive days of full-time employment with the Company, may take an unpaid leave of absence for the purpose of giving birth or adopting a child under the age of eighteen (18) (or for adopting a child under the age of twenty-three (23) if the child is mentally or physically disabled) up to a period of eight (8) consecutive weeks. Employees must provide at least two weeks notice of the anticipated date of departure and the employee's intention to return. If the need is not foreseeable, the employee

must provide notice as soon as practicable if the reason for the delay is beyond the employee's control.

At the end of the bonding leave, the employee will be reinstated to his/her previous or similar position with the same status, pay, benefit accrual and seniority as of the date of his/her leave unless business necessity makes this impossible or unreasonable and the leave exceeds eight (8) weeks.

#### *Jury Leave*

Employees who are called for jury duty will be granted time off with pay to perform this civic duty. Employees must notify HR as soon as they learn they have been summoned as a juror so that work arrangements can be made. In order to be paid for Jury Leave, an employee must provide the HR with the jury summons and a note from the Clerk of the Court indicating the times the employee was in court for jury duty. The Company will pay employees straight time for their regularly scheduled hours of work, minus the compensation they received from the court for their service as jurors, for up to five days of jury service. An employee who is excused from jury duty prior to the end of a regularly scheduled workday must report for work for the remainder of that day, or otherwise notify HR of his or her availability to work.

#### *Military Leave*

The Company will grant employees called into military service an unpaid leave of absence and reemployment rights as provided by the laws of the United States.

Employees in the military reserve or National Guard will be granted two-weeks off to fulfill their annual two-week training obligation. Upon submission of military pay vouchers, employees will be paid the difference between military pay and their regular base pay for such two-week training period.

In addition, new FMLA regulations include two types of military family leave referred to as “qualifying exigency leave” and “military caregiver leave”. Employees should speak with the HR regarding military leave. Reinstatement following military leave will be in compliance with state and federal law.

#### *Voting Leave*

Generally, employees should vote before or after regularly scheduled work hours. However, employees may request unpaid leave, if needed, to vote during the first two hours after the polls open.

#### **PARKING**

Parking at the Company in designated areas is available for all employees. Employees should consult their supervisor for the location assigned to them. The Company will not be liable for damage, theft, or other destruction of an employee's property while utilizing the parking lot.



## **ACKNOWLEDGEMENT OF RECEIPT OF EMPLOYEE HANDBOOK**

I have received the current employee handbook maintained by 253 Organic, LLC (the “Company”) and have read and understand the material covered. I have had the opportunity to ask questions about the policies in this handbook, and I understand that any future questions that I may have about the handbook or its contents will be answered by the Human Resources Manager upon request. I agree to and will comply with the policies, procedures, and other guidelines set forth in the handbook. I understand that the Company reserves the right to change, modify, or abolish any or all of the policies, benefits, rules, and regulations contained or described in the handbook as it deems appropriate at any time, with or without notice. I acknowledge that neither the handbook nor its contents are an express or implied contract regarding my employment.

I further understand that all employees of the Company, regardless of their classification or position, are employed on an at-will basis, and their employment is terminable at the will of the employee or the Company at any time, with or without cause, and with or without notice. I have also been informed and understand that no officer, agent, representative, or employee of the Company has any authority to enter into any agreement with any applicant for employment or employee for an employment arrangement or relationship other than on an at-will basis and nothing contained in the policies, procedures, handbooks, or any other documents of the Company shall in any way create an express or implied contract of employment or an employment relationship other than one on an at-will basis.

This handbook is Company property and must be returned upon termination of employment.

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Firma

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Fecha

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Employee Name: Printed



# Janitorial - Vomit and Diarrhea Clean Up Procedure

Written By: Hannah Ward

## INTRODUCTION

**WHY DO WE HAVE THIS PROCEDURE?** Vomiting and diarrhea can be symptoms of several very contagious diseases and it is the responsibility of food service management to protect both employees and customers from transmission of these diseases. The most important ways of accomplishing this task are:

1) ensure that employees understand the importance of frequent handwashing and that they know where and how to wash their hands; 2) ensure that employees understand their responsibility to report all disease symptoms, such as vomiting, diarrhea, jaundice, fever and sore throat; diagnosis of diseases; and exposure to others who are sick to the Person in Charge; 3) ensure that employees are trained and do not handle food that is ready to eat with their bare hands; 4) ensure that employees understand the importance of following all regular cleaning and sanitizing procedures on a daily basis and special cleaning and sanitizing procedures such as this one.

New employees will be trained in all of the above-mentioned procedures within the first week of hiring. Reminder trainings will be done for all food service staff on an **ANNUAL** basis.

## RESPONSIBLE EMPLOYEES

Managers

Maintenance

All Employees



## TOOLS:

- [Nitrile Gloves](#) (1)
- [Paper Towels](#) (1)
- [Baking Soda](#) (1)
- [Scoop or scraper](#) (1)
- [caution tape for closing off areas](#) (1)
- [trash bags](#) (1)
- [sanitizer](#) (1)
- [bucket](#) (1)
- [wiping cloth](#) (1)
- [detergent](#) (1)




## — WHEN A VOMITING OR DIARRHEA INCIDENT OCCURS

- Remove the following from the area if no contact with vomit or diarrhea:
  - employees and/or customers
  - packaged food or food in closed containers
  - portable equipment, linens and open single-use and single-service articles
- For diarrhea, the immediate area that is visibly soiled should be the area of clean-up concentration. For vomiting, since particles can be in the air, an area of 25 feet in all directions should be considered the clean-up area.
- In the air, an area of 25 feet in all directions should be considered the clean-up area.
- This is very important when considering which employees or customers need to be removed; the food; and open single-use and single-service articles that need to be discarded; the linens that will need to be washed; and the equipment that will need to be cleaned and sanitized.

- If vomiting occurred, completely close off area around the spill for 25 feet in all directions. Use caution tape from the Clean-up Kit.
- Some small food service establishments will have to close during the clean-up of a vomiting incident either by an employee or a customer. In the case of closure, the Regulatory Authority should be called immediately to report the incident.
- A sign can be put at the entrance stating that the food service establishment will be closed until a time judged to be sufficient to accomplish the required clean-up.
- A trained employee should put on Personal Protective Equipment, gloves last.
  - All employees are trained in this clean-up procedure. If staffing allows, cooks should not be the first choice for carrying out the clean-up.
- Sprinkle on vomit/fecal matter to soak up liquid.
- (Kind of absorbent material) Using the scraper or scoop from the Clean-up Kit, and paper towels, carefully wipe up vomit/fecal matter and discard in a plastic trash bag. Then remove and discard gloves.
- If staffing allows, a separate employee, wearing gloves and a mask, can hold the trash bag open by folding the top back over their hands so that the top of the bag is not contaminated in the process of discarding the paper towels, gloves, etc.

- Wash hands and put on new disposable gloves and wash the area involved with detergent and warm water.
- All surfaces within the incident area, plus all doorknobs, railings, wall corners or other places that you know are frequently touched should then be washed with soap and water.
- All restrooms should be cleaned also, even if they were not known to be affected by the incident. They are often used by employees and customers when they are not feeling well and the infectious germs will be there even if they cannot be seen.
- All areas washed as described above will then be sanitized.
- Sanitize hard or porous surfaces with chlorine bleach solution allowing the area to remain wet for no less than 5 minutes; follow policy directions for other surfaces or when using other sanitizers.

## — Bleach Concentrations

- 5.25% Sodium Hypochlorite 1 2/3 cup bleach per gallon of water 5000 PPM or 6% dish machine sanitizer (1 part bleach to 10 parts water)
  - 8.25% concentrated Sodium 1 cup bleach per gallon of water 5000 PPM Hypochlorite (1 part bleach to 16 parts water)
  - Sanitizer to be used in this establishment will be and will be left wet on hard surfaces for minutes before drying with papers towels.
-  Ammonium chloride sanitizers are ineffective against Norovirus so if those are the standard sanitizers used in a food service establishment, then chlorine bleach (or some other commercial product approved by the EPA to kill Norovirus) must be kept on hand for use during a vomit/diarrhea incident.
- Bleach is available in several different concentrations so food service establishments need to be aware of the concentration they have available. Once opened, a bottle of bleach maintains its strength for 30 days so **PUT THE DATE ON THE BOTTLE WHEN YOU OPEN IT**. Discard it after 30 days.
  - Remember that bleach will discolor many items such as carpets, flooring, etc. Test a small area if there is any reason to believe that there will be a problem. Steam cleaning of carpets and upholstery is recommended once the vomit/diarrhea has been removed. Linens should be washed in hot water and dried in a hot dryer.
  - Open windows or increase ventilation as much as possible during the clean-up.
  - Make sure that all high-touch areas and restrooms are sanitized before areas are re- opened.

## — Finishing Up

- When totally finished cleaning up, dispose of all paper towels and PPE in the plastic bag. Tie the bag closed and double bag it before putting it in your regular trash.
- Rinse food contact surfaces with clean water to remove chlorine residue left on the surface because you used 5000 PPM to kill the infectious agents and re-sanitize with your usual 100 ppm sanitizer.
- **RE-OPENING ESTABLISHMENT OR CLEANED AREAS**
  - When the above-described clean-up procedure has been completed, the areas may be re-opened. Establishments that closed for clean-up should call the Regulatory Authority and report that they are ready to re-open. The Regulatory Authority may, or may not, want to actually visit the establishment prior to re-opening.
  - Establishments should anticipate that some customers may request some kind of compensation. Management should discuss that with employees as part of the training on this procedure. The decision concerning compensation is entirely up to the establishment management.
- **MONITORING EMPLOYEES FOR ILLNESS** After incidents involving diarrhea, and particularly vomiting, all employees, but particularly those involved in the clean-up, will be monitored for signs of illness for several days. The Person-in-Charge will remind employees to report symptoms of any illness.
- **INCIDENT REPORT** It is advisable for the Person-in-Charge to complete an incident report describing the date and time of the incident; which employees were in charge of the clean-up; an overall description of the area of the incident; how it was cleaned and sanitized; and the other areas of the establishment cleaned and sanitized.
  - It should also state what food was discarded. This report should be kept in the establishment files in case there are any future questions about the incident.



# LAB - DIGITAL ULTRASONIC CLEANER

Written By: Hannah Ward

## INTRODUCTION

This is used for cleaning tools in the lab.

## RESPONSIBLE EMPLOYEES

Lab Manager

Lab Assistant

## — Procedure

- TURN ON CLEANER WITH THE SMALL RED SWITCH IN THE BACK
- TURN ON HEATER <SET AT 60 >
- WAIT FOR WATER TO WARMUP TO SET TEMPERATURE
- PLACE ITEMS TO BE CLEANED IN BASKET OF THE CLEANER **CLEANING SOLUTION** 2 1/2 TBSP ALCONOX / 1 GALLON OF WATER
- PUT LID BACK ON AND TURN ON ULTRASONIC VIBRATOR DO NOT PUT HAND IN WATER WHILE VIBRATING
- ALLOW ITEMS TO CLEAN ANYWHERE FROM 5 SECONDS TO 5+ MINUTES DEPENDING ON HOW DIRTY ITEMS ARE
- TURN OFF ULTRASONIC VIBRATOR
- RINSE ITEM WITH FRESH WATER AND ALLOW TO DRY



# LAB - Plant Material Prep

Written By: Hannah Ward

## INTRODUCTION

Protocol for preparing plant matter for extraction by hydrocarbon or CO<sub>2</sub>.

## RESPONSIBLE EMPLOYEES

Lab Manager

Lab Assistant



## — Packing the Sock

- Higher quality flower yields higher quality concentrates, but they can be made from trim as well.
- Plant material should be ground but not too fine, as that causes it to pack in too tight.
- Ground flower is added to a nylon sleeve or "sock" that will go inside the machine.
- Tare weights are taken of the sock before flower is added. Only same strains are grouped together for now.
- Keep track of all metric tags for plant material.
- Biomass does not need to be tested before it is transferred or extracted as it is tested in its final form.
- This takes 2 people with the help of a metal funnel. A ring stand and clamp also serves well to hold the sock open. Workspace should be cleaned and sanitized before and after this process. Be advised, a large amount of keif may be released during this process, take care to wear proper PPE.
- In general this should be done away from sensitive lab equipment. Do not let the sock material touch the floor. If necessary, cut a piece of plastic to put down to protect the sock.

## — Quarantine Protocol for Remediated Flower

- Occasionally flower that is still "good" will fail for mold as we are dealing with plants. This material can still be extracted as the mold spores do not get picked up by the hydrocarbon.
- This material should be kept separate from everything as much as possible as it is contaminated with spores.
- It is stored in plastic bins, sealed in plastic bags in the walk in freezer.
- When being handled, appropriate air flow should be observed & cleanliness procedures should be followed. PPE should be worn - gloves, masks, etc.
- If possible a new gas collection tank will be used to keep all things separate to be safe.
- Remediated product can only be combined with other remediated products due to how Metric is built.

## — Clean your socks!

- Used socks can be put into the machine and cleaned during "dry runs". They can be reused several times.
-



# LAB - Refining Cleaning EToH

Written By: Hannah Ward

## INTRODUCTION

### RESPONSIBLE EMPLOYEES

Lab Manager

Lab Assistant

## — Setup and Starting

- Purpose is to recapture and separate the ethanol from the cannabis extracts
- Place the used cleaning oil in the cryogenic freezer
- Set up buchner funnel and pump and run frozen cleaning ethanol thru
- Take the used cleaning ethanol and pour into round bowling flask of the roto vape. ONLY FILL HALF WAY. DO NOT OVER FILL
- Use a small amount of KRYTOX performance lubricants about a pea size. Place your finger and lubricant on the middle of the shaft connection and rotate.
- connect the flask to rotovape by tightening the black base
- turn on the chiller, rotovape, and pump (GREEN switch's)
- Chiller temp is preset

## — Running

- press temperature button then press on ( wait for temperature to rise)
- Lower rotovape to 5.5
- press the rotate arrow
- press start on the display of the pump
- check red knobs to make sure they are tight
- use the dial on the pump to regulate the drips on the condoner coil. NEVER ALLOW LIQUID TO RUN TO THRE TOP OF COIL
- ambient pressure is 1008
- target vacuum is between 91-180 (strain amount dependent )

## — Ending the Run

- use knob to activate or deactivate pump pressure
  - Once the collection vessel is almost full
  - STOP ROTATION
  - Raise roto vane with arrows
  - STOP PUMP
  - Use red knobs to release vacuum to normal pressure
  - undo screw and take off clamp
-



# Manufacturing - Cleaning & Disinfecting

Written By: Hannah Ward



## INTRODUCTION

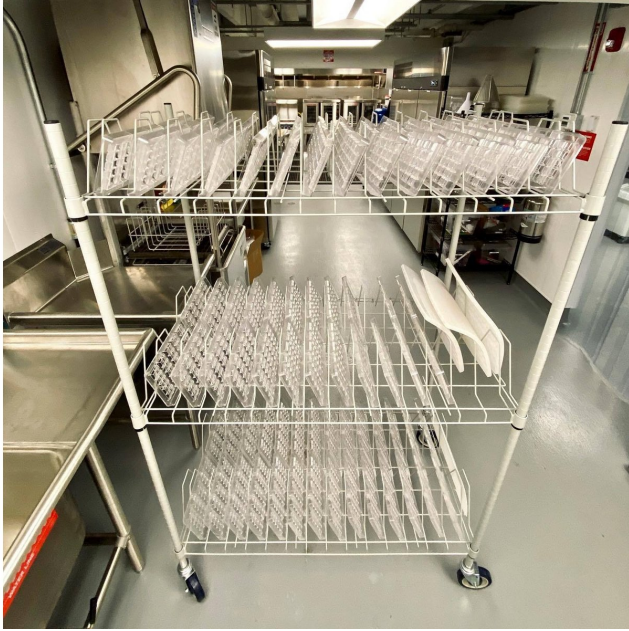
Before the end of the shift, after work on product has been completed, all surfaces and tools must be cleaned and disinfected.

## RESPONSIBLE EMPLOYEES

- Lab Manager
- Kitchen Manager
- Packaging Supervisor



## — KITCHEN PROCEDURE



- All product should be moved to an appropriate location in order to eliminate contamination.
- Scrub all work surfaces, floors and tools with a scotch pad to remove debris from surfaces. Any other stubborn materials, use Simple Green Crystal Cleaner & Degreaser. Wipe surfaces dry with paper towels.
- After material has been removed from surfaces and surfaces are dry, they are to be disinfected. Thoroughly wet the pre-cleaned surfaces with Sporicidin Disinfectant Solution and allow to remain wet for 10 minutes at room temperature.
- Clean surfaces again using Simple Green Crystal Cleaner & Degreaser, then rinse/wipe surfaces with water. Wipe dry.

## — LAB PROCEDURE



- Ethanol is used to clean tools and equipment in lab. Isopropyl alcohol used to clean surfaces.
- Ultrasonic cleaner also used to clean tools and equipment. See page "Ultrasonic Cleaner" under section "Processing" for more details.



# Manufacturing - Packaging

Products are packaged prior to labeling and transfer.

Written By: Hannah Ward



## INTRODUCTION

Products are packaged prior to labeling and transfer. Cultivation, Manufacturing and Retail each have slightly different packaging requirements based on what item is being packaged, what the intended use is, and who is going to be purchasing the product.

## RESPONSIBLE EMPLOYEES

- Marketing Manager
- Compliance Manager
- Packaging Supervisor - Manufacturing
- Packaging Supervisor - Production
- Packagers

## OVERVIEW OF REGULATIONS

### Tamper or Child-Resistant Packaging

We shall ensure that all marijuana products that are provided for sale to consumers by a us shall be sold in tamper or child-resistant packaging.

To be in compliance with 935 CMR 500.105(6), we shall ensure:

1. That to the extent it is not unreasonably impracticable for the specific type of product, marijuana products:
2. a. are packaged in containers that are opaque or plain in design;
3. b. resealable for any marijuana product intended for more than a single use or containing multiple servings;
4. c. and certified by a qualified third-party tamper or child-resistant packaging testing firm that the packaging is in compliance with the most recent poison prevention packaging regulations of the US Consumer Product Safety Commission as included at 16 CFR 1700; or
5. That where compliance with the requirements of tamper or child-resistant packaging is deemed to be unreasonably impracticable, marijuana products shall be placed in an exit package that is
6. a. capable of being resealed and made tamper or child-resistant resistant again after it has been opened;
7. b. includes the following statement, including capitalization, in at least ten-point Times New Roman, Helvetica or Arial font: KEEP OUT OF REACH OF CHILDREN; and
8. c. is certified by a qualified third-party tamper or child-resistant packaging testing firm that the packaging is in compliance with the most recent poison prevention packaging regulations of the US Consumer Product Safety Commission as included at 16 CFR 1700.

## Limits on Packaging Design

Packaging for marijuana products sold or displayed for consumers, including any label or imprint affixed to any packaging containing marijuana products or any exit packages, shall not be attractive minors. Packaging is explicitly prohibited from:

1. using bright colors, defined as colors that are “neon” in appearance;
2. imitating or having a semblance to any existing branded consumer products, including foods and beverages, that do not contain marijuana;
3. featuring cartoons;
4. featuring a design, brand or name that resembles a non-cannabis consumer product of the type that is typically marketed to minors;
5. featuring symbols or celebrities that are commonly used to market products to minors;
6. featuring images of minors; or
7. featuring words that refer to products that are commonly associated with minors or marketed to minors.

## Packaging of Multiple Servings

1. Packaging for marijuana products sold or displayed for consumers in multiple servings shall include the following statement on the exterior of the package in a printed font that is no smaller than ten-point Times New Roman, Helvetica or Arial, including capitalization: “INCLUDES MULTIPLE SERVINGS.”
2. Packaging for marijuana products in solid form sold or displayed for consumers in multiple servings shall allow a consumer to easily perform the division into single servings.
  - a. Edible marijuana products in a solid form shall be easily and permanently scored to identify individual servings.

b. Notwithstanding 935 CMR 500.105(6)(c)(2)(a), where a product is unable, because of its form, to be easily and permanently scored to identify individual servings, the product shall be packaged in a single serving size. The determination of whether a product is able to be easily and permanently

scored shall be decided by the Commission consistent with sub-regulatory guidelines established by the Commission and provided to licensees.

3. Packaging for marijuana product beverages shall be packages solely in a single serving size. Multiple serving beverages are strictly prohibited for sale.

Each single serving of an edible marijuana product contained in a multiple-serving package shall be marked, stamped or otherwise imprinted with the symbol issued by the Commission under 935 CMR 500.105(5) that indicates that the single serving is a marijuana product.

Serving size shall be determined by the processor but in no instance shall an individual serving size of any marijuana product contain more than five milligrams of delta-nine-tetrahydrocannabinol ( $\Delta$ 9-THC).

### **Packaging and Labeling Pre-Approval**

Prior to a marijuana product being sold at a Marijuana Establishment, we shall submit an application, in a form and manner determined by the Commission, for packaging and label approval to the Commission. The Commission may charge a fee for packaging and labeling pre-approval. The packaging and labeling pre-approval process shall in no way substitute for compliance with the regulations set forth in 935 CMR 500.105(4) through (6)

### **Dosing Limitations**

A Marijuana Product Manufacturer may not prepare, and a Marijuana Retailer may not deliver, sell or otherwise transfer an edible marijuana product with potency levels exceeding the following, as tested by an independent marijuana testing facility licensed in accordance with M.G.L. c. 94G, § 15:

(a) for a single serving of an edible marijuana product, five milligrams of active tetrahydrocannabinol (THC); and

(b) in a single package of multiple edible marijuana product to be eaten, swallowed, or otherwise ingested, not more than 20 servings or 100 milligrams of active THC.

(c) The THC content must be homogenous, or evenly distributed throughout the edible marijuana product.



**Additional**

All cannabis product to be packaged will be visually inspected by the Quality Control Supervisor to ensure the integrity of the cannabis in terms of strain, content, and amounts.

Product is only to be weighed for packaging using a legal for trade, certified scale in the packaging room.

The cannabis products must be labeled with the required labeling information (see "Labels").

All handling of cannabis or cannabis products throughout the acquisition, inspection, weighing, packaging and labeling process will be done by our agents under strict cleanliness, security and sanitary controls as required by the Commission's regulations (105 CMR 300.000).

## — Packaging - Vape Cart



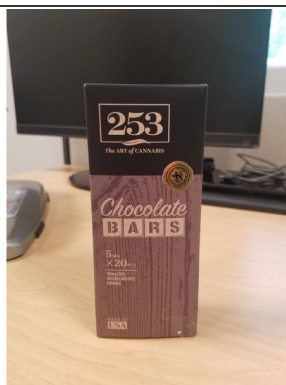
- Breakdown of what the Vape Cartridge Label & packaging looks like

## — Packaging - Concentrate



- See Label Guide for specifics on labelling.
- Child proof jar is placed inside the box with a tamper seal affixed on box.
- This is used for Batter, Wax, Crumble, and Sugar Concentrates

## — Packaging - Chocolate



Nutrition Facts	
20 servings per container	
Serving size (1 piece)	
<b>Calories per serving</b> 15	
*The % Daily Value (DV) tells you how much a nutrient in a serving of food contributes to a diet of 2,000 calories.	
Not a significant source of Cholesterol, Vitamin D, Potassium and Protein.	
The ingredients: Cannabis Extract and Milk Chocolate (sugar, powdered whole milk, cocoa butter, cocoa mass, soy lecithin, vanilla).	
Amount/serving	% Daily Value*
<b>Total Fat</b> 1.5g	2%
— Saturated Fat 0.88g	4%
— Trans Fat 0g	
<b>Sodium</b> 0mg	0%
<b>Total Carbohydrate</b>	1%
— Dietary Fiber 0g	0%
<b>Total Sugars</b> 2g	
— Includes 1g Added Sugars	0%
<b>Sugar Alcohol</b> 0g	
<b>Protein</b> 0g	0%

- White Label TBD as this product has not been made for retail sale yet, and is still in R&D phase

## — Packaging - Tincture



- Product Still in R&D phase, none have been manufactured for sale in retail as of the writing of this guide.
- Photos show what packaging is going to be used.
- White Label will specific info will be placed on back of packaging.



# Manufacturing - Overview of Products & Personnel

Written By: Hannah Ward

Wax

Dough

Bubble Hash

Shatter

Sauce

Dry Sift Kief

Crumble

Rosin

Batter



## INTRODUCTION

The creation of this standard operating procedure document is motivated by the desire and need to inform and guide the new or existing employees about the rules, features, and guidelines for the successful conduct of cultivation and production in the facility. This is an organic document. As the facility grows and matures, the contents of this document will change with it.

## Hours of Operation 8:00am-4:30pm, Mon-Fri After Hours Contact Information

### John Snyder, COO

716-796-4679

jsnyder@253organic.com

### Chris Gallant, CEO

774-236-9389

cgallant@253organic.com

### Danielle Rouse, Kitchen Manager

413-336-0444

drouse@253organic.com

## Address

253 Organic LLC, 253 Millers Falls Rd, Turners Falls, MA 01376

## Details - Personnel

Manufacturing is made up of our Extraction Lab and our MIP Kitchen.

## Manufacturing - Kitchen

**Job Title:** The Kitchen Manager

**Reports to:** COO

**Job Description:** The Kitchen Manager is responsible for overseeing every aspect of the Kitchen. The Kitchen Manager must be extremely organized and able to prioritize, delegate and implement tasks and policies for the kitchen staff. In addition, the Kitchen Manager is responsible for the management of all kitchen equipment maintenance and replacement. He/she will be responsible for training new and existing employees on all aspects of the kitchen. The Kitchen Manager will also be involved in inventory management, ordering supplies, as well as other administrative duties as required. The Kitchen Manager must have an intense interest in cannabis with a willingness and drive to understand all aspects of producing edible marijuana products. The Kitchen Manager is expected to stay current and knowledgeable about the MJ offered by 253 Organic and other products in the industry. They must also be knowledgeable about Massachusetts state and local laws pertaining to marijuana (MJ). We are looking for people to grow with us and to be a part of our strong team environment.

**Specific Responsibilities:**

- Oversee all operations of the Kitchen Facility.
- Inventory and Supply Chain Management.
- Train all employees on correct cooking techniques.
- Ensure kitchen facility meets all compliance requirements put in place by the CCC, and Massachusetts MJ state law Organize and track all kitchen inventory
- Implement and Maintain Daily Logs
- Enforce all PPE and cleanliness policies
- Coordinate with the Director of Operations and to manage and complete any and all tasks necessary for the continued operation of the kitchen at a very high level.
- Lead by example to instill the Company's culture and values with all team members.

**Job Title:** Kitchen Assistant

**Report to:** Kitchen Manager

**Job Description:** Kitchen staff are responsible for navigating day to day Kitchen operations producing products infused with Cannabis Oils and Isolates. This position will work closely with the Kitchen Manager to ensure workflow meets the necessary specifications in accordance with company standard operating procedures. Kitchen equipment is cleaned and maintained daily by both the Kitchen Manager and the Kitchen Assistant. The goal is to optimize kitchen and cooking procedures to successfully create consistent, safe, delicious, quality MJ Infused Edibles. Communication skills, organization, attention to safety, detail and time management are critical to the success of our Kitchen and to the success of 253 Organic.

**Specific Responsibilities:**

- Assist in the creation and production of large batches of Edibles.
- Prepare and clean work spaces, equipment and materials daily.
- Prepare samples to be sent to lab for testing
- ServSafe Certified.

## **Manufacturing - Lab**

**Job Title:** Lab Manager

**Reports to:** COO

**Job Description:** The Lab Manager is responsible for overseeing every aspect of the lab. The Lab Manager must be extremely organized and able to prioritize, delegate and implement tasks and policies for the Lab staff. The Lab Manager will be responsible for managing all of the Lab staff. In addition, the Lab Manager is responsible for the management of all lab equipment maintenance and replacement. He/she will be responsible for training new and existing employees on all aspects of the Lab. The Lab manager will also be involved in inventory management, ordering supplies, as well as other administrative duties as required. The Lab Manager must have an intense interest in cannabis with a willingness and drive to understand all aspects of producing lab created marijuana products. The Lab Manager is expected to stay current and knowledgeable about the MJ offered by 253 Organic and other products in the industry. They must also be knowledgeable about Massachusetts state and local laws pertaining to marijuana (MJ). We are looking for people to grow with us and to be a part of our strong team environment.

### **Specific Responsibilities:**

- Oversee all operations of the Lab Facility
- Inventory and Supply Chain Management.
- Train all employees on correct laboratory techniques.
- Ensure Lab facility meets all compliance requirements put in place by the CCC, and Massachusetts MJ state law.
- Organize and track all Lab inventory
- Implement and Maintain Daily Logs
- Enforce all PPE and cleanliness policies
- Coordinate with the Director of Operations and to manage and complete any and all tasks necessary for the continued operation of the Lab at a very high level.
- Lead by example to instill the Company's culture and values with all team members.

**Job Title:** Lab Assistant

**Report to:** Lab Manager



**Job Description:**

The Lab Assistant is responsible for completing day to day operations. They will learn all processes from beginning to end. This will include a number of tasks but not limited to preparing cannabis for extraction, operating extraction machinery, detailed weighing of products, preparing samples for testing and packaging of products. The Extraction Lab will maintain the highest level of cleanliness and will be sanitized on a daily basis. She/he will be required to perform light to moderate lifting of items. Tracking of all products will need to be done through our computer system, which will also include inventory control. They must be knowledgeable about the Massachusetts state and local laws pertaining to Manufacturing compliance laws. We are looking for people to grow with us and to be part of a strong team environment.

**Specific Responsibilities:**

- Preparing cannabis for extraction
- Testing of in-progress and completed batches, making sure all products are of the highest quality and meet state regulations
- Maintaining detailed records
- Sanitizing all tools and equipment on a daily basis
- Accurately labeling of products in-process and finished products
- Following all safety regulations while working in a laboratory
- Packaging Concentrates for sale as instructed in conjunction with the Manufacturing Packaging Staff when needed

**Manufacturing - Packaging**

**Job Title:** Manufacturing Packaging Supervisor

**Report to:** Lab & Kitchen Managers

**Job Description:**

The Manufacturing Packaging Supervisor is responsible for coordinating and overseeing post-production labeling and packaging of all manufactured cannabis products produced in our Manufacturing Lab & Kitchen. This includes but is not limited to: concentrates, tinctures & edibles. The Manufacturing Packaging Supervisor will coordinate with the Lab and Kitchen managers to facilitate supply chain management & ordering as needed to meet packaging and order deadlines for both adult use sales in our onsite Retail Store as well as Wholesale Orders. Duties performed include verifying all state mandated compliance information, updating the company's internal database when directed, printing and applying product labels as needed, as well as physically packaging products as indicated by company operating procedures when necessary. Familiarity with cannabis products & regulations is extremely helpful but not required. This position reports to the Kitchen & Lab Managers.

**Specific Responsibilities:**

- Create all compliance labels using label printer software
- Pack, label, and organize finished goods into containers, correctly following the organization's standard operating procedure (SOP)
- Verify product labeling compliance in accordance with product information, testing results, and other required information
- Maintain forms and database to track relevant information as instructed
- Assist when applicable with assembly, labeling, and prepping wholesale cannabis for shipping of finished cannabis products
- Maintain packaging label templates/checklists for all products.
- Assist the Inventory department with consumable tracking for packaging components for all manufactured products
- Maintain Inventory & Conduct Inventory Audits as needed
- Coordinate with Administration & Managers to order supplies & packaging as needed

**Job Title:** Manufacturing Packager

**Report to:** Packaging Supervisor

**Job Description:**

The Manufacturing Packager is responsible for the post-production labeling and packaging of all manufactured cannabis products produced in our Manufacturing Lab & Kitchen. This includes but is not limited to: concentrates, tinctures & edibles. Duties performed include verifying all state mandated compliance information, updating the company's internal database when directed, printing and applying product labels as needed, as well as physically packaging products as indicated by company operating procedures. Familiarity with cannabis products & regulations is extremely helpful but not required. This position reports to the Manufacturing Packaging Supervisor.

---

**Specific Responsibilities:**

- Pack, label, and organize finished goods into containers, correctly following the organization's standard operating procedure (SOP)
- Verify product labeling compliance in accordance with product information, testing results, and other required information
- Maintain forms and database to track relevant information as instructed
- Assist when applicable with assembly, labeling, and prepping wholesale cannabis for shipping of finished cannabis products
- Maintain packaging label templates/checklists for all products.
- Assist the Inventory department with consumable tracking for packaging components for all manufactured products
- Assist with Metrc manifest creation and data entry when requested/applicable

**Details - Products**

We manufacture the following products in our Extraction Lab and MIP Kitchen:

## — Concentrates - Solventless

- Kief
- Rosin
- CO2 Terp Sauce
- CO2 Vape Cartridge

## — Concentrates - Solvent

- Wax
- Shatter
- Sugar
- Crumble
- Batter

## — Tinctures

- MCT Oil based Tincture made with CO2 Oil (Coming Soon)

## — Edibles - MIPs

- Jellies
- Chews
- Chocolate Bars
- Hard Candies (Coming Soon)



# Product Labels - Checklist - Concentrates

Written By: Hannah Ward



## INTRODUCTION

Any changes to Label Format or Included fields must be approved by Compliance or COO before change is finalized.

## — Product Packaging Check List



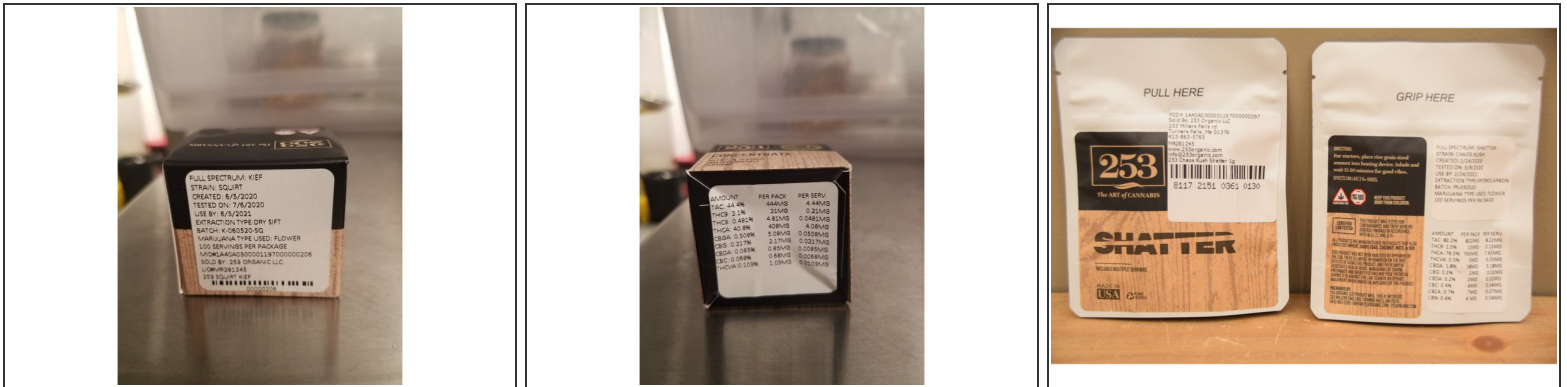
Interior Packaging - Top



- 253 Organic LLC, MP281302
- 253 Phone Number
- 253 Email
- 253 Website
- Concentrate or Extract
- testing for contaminants statement, FDA Statement & 2 Red warning symbols
- allergens statement
- Directions for use - on interior of package top.

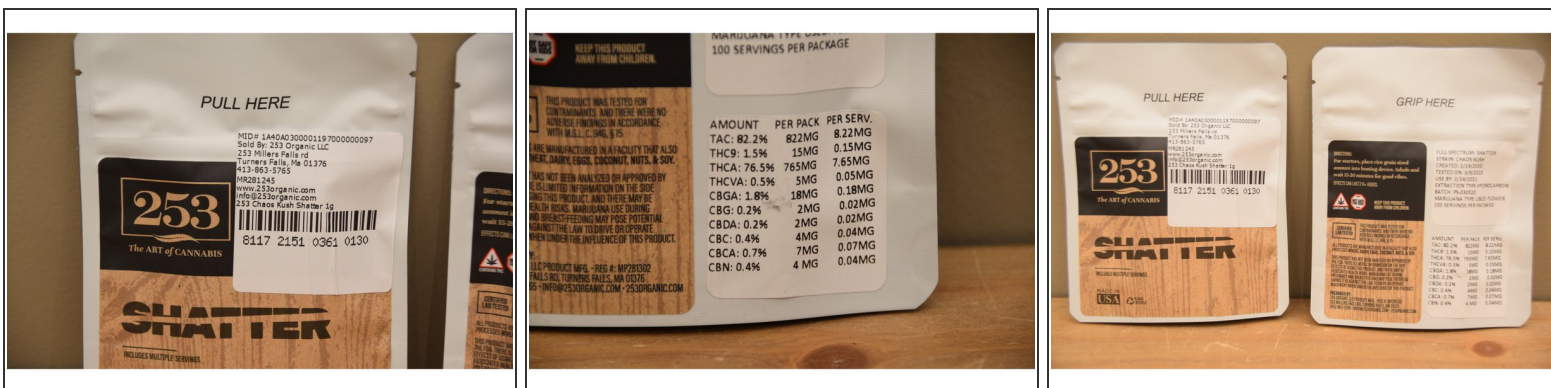


## — White Label Check List



- Date of Testing - Date of COA Report, if there are multiple reports , use the date of the most complete report unless there was a fail - in this case use the date of the newest report with a pass. If there are multiple COAs and space to list multiple dates, do so but it is not required.
- Net Weight of Volume expressed in US Customary Units (oz.) & Metric Units (g)
- Type of MJ used to produce the product, Processing Technique & solvents used
- List of Ingredients & additives
- Full cannabananoid profile, expressed in absolute terms and a % of volume, terpenes expressed in absolute terms & & of volume
- Serving size & number of servings per pkg
- Date of Creation, expiration date
- Batch #, Bar code

## — Shatter Exit Packaging & Labels



- Most concentrates go in jars & boxes, Shatter is packaged in parchment & secure slide boxes that is placed in pictured child proof bags



# Power Outage Action Plan - Manufacturing

Written By: Hannah Ward

## INTRODUCTION

### RESPONSIBLE EMPLOYEES

Lab Manager

Lab Assistant

---

## — If the facility loses power

- Emergency lights are on the backup generator, they will come on.
  - If power does not come right back on, safely locate a flashlight and pay attention to any instructions or emergency situations.
  - If equipment is running in the lab, the most important machines to check first are:
    - C02 - Apex
    - Compressor for MEP pump
    - Ovens/Pumps
-



# Manufacturing - Overview of Products & Personnel

Written By: Hannah Ward

Wax

Dough

Bubble Hash

Shatter

Sauce

Dry Sift Kief

Crumble

Rosin

Batter



## INTRODUCTION

The creation of this standard operating procedure document is motivated by the desire and need to inform and guide the new or existing employees about the rules, features, and guidelines for the successful conduct of cultivation and production in the facility. This is an organic document. As the facility grows and matures, the contents of this document will change with it.

## Hours of Operation 8:00am-4:30pm, Mon-Fri After Hours Contact Information

### John Snyder, COO

716-796-4679

jsnyder@253organic.com

### Chris Gallant, CEO

774-236-9389

cgallant@253organic.com

### Danielle Rouse, Kitchen Manager

413-336-0444

drouse@253organic.com

## Address

253 Organic LLC, 253 Millers Falls Rd, Turners Falls, MA 01376

## Details - Personnel

Manufacturing is made up of our Extraction Lab and our MIP Kitchen.

## Manufacturing - Kitchen

**Job Title:** The Kitchen Manager

**Reports to:** COO

**Job Description:** The Kitchen Manager is responsible for overseeing every aspect of the Kitchen. The Kitchen Manager must be extremely organized and able to prioritize, delegate and implement tasks and policies for the kitchen staff. In addition, the Kitchen Manager is responsible for the management of all kitchen equipment maintenance and replacement. He/she will be responsible for training new and existing employees on all aspects of the kitchen. The Kitchen Manager will also be involved in inventory management, ordering supplies, as well as other administrative duties as required. The Kitchen Manager must have an intense interest in cannabis with a willingness and drive to understand all aspects of producing edible marijuana products. The Kitchen Manager is expected to stay current and knowledgeable about the MJ offered by 253 Organic and other products in the industry. They must also be knowledgeable about Massachusetts state and local laws pertaining to marijuana (MJ). We are looking for people to grow with us and to be a part of our strong team environment.

**Specific Responsibilities:**

- Oversee all operations of the Kitchen Facility.
- Inventory and Supply Chain Management.
- Train all employees on correct cooking techniques.
- Ensure kitchen facility meets all compliance requirements put in place by the CCC, and Massachusetts MJ state law Organize and track all kitchen inventory
- Implement and Maintain Daily Logs
- Enforce all PPE and cleanliness policies
- Coordinate with the Director of Operations and to manage and complete any and all tasks necessary for the continued operation of the kitchen at a very high level.
- Lead by example to instill the Company's culture and values with all team members.

**Job Title:** Kitchen Assistant

**Report to:** Kitchen Manager

**Job Description:** Kitchen staff are responsible for navigating day to day Kitchen operations producing products infused with Cannabis Oils and Isolates. This position will work closely with the Kitchen Manager to ensure workflow meets the necessary specifications in accordance with company standard operating procedures. Kitchen equipment is cleaned and maintained daily by both the Kitchen Manager and the Kitchen Assistant. The goal is to optimize kitchen and cooking procedures to successfully create consistent, safe, delicious, quality MJ Infused Edibles. Communication skills, organization, attention to safety, detail and time management are critical to the success of our Kitchen and to the success of 253 Organic.

**Specific Responsibilities:**



- Assist in the creation and production of large batches of Edibles.
- Prepare and clean work spaces, equipment and materials daily.
- Prepare samples to be sent to lab for testing
- ServSafe Certified.

## **Manufacturing - Lab**

**Job Title:** Lab Manager

**Reports to:** COO

**Job Description:** The Lab Manager is responsible for overseeing every aspect of the lab. The Lab Manager must be extremely organized and able to prioritize, delegate and implement tasks and policies for the Lab staff. The Lab Manager will be responsible for managing all of the Lab staff. In addition, the Lab Manager is responsible for the management of all lab equipment maintenance and replacement. He/she will be responsible for training new and existing employees on all aspects of the Lab. The Lab manager will also be involved in inventory management, ordering supplies, as well as other administrative duties as required. The Lab Manager must have an intense interest in cannabis with a willingness and drive to understand all aspects of producing lab created marijuana products. The Lab Manager is expected to stay current and knowledgeable about the MJ offered by 253 Organic and other products in the industry. They must also be knowledgeable about Massachusetts state and local laws pertaining to marijuana (MJ). We are looking for people to grow with us and to be a part of our strong team environment.

### **Specific Responsibilities:**

- Oversee all operations of the Lab Facility
- Inventory and Supply Chain Management.
- Train all employees on correct laboratory techniques.
- Ensure Lab facility meets all compliance requirements put in place by the CCC, and Massachusetts MJ state law.
- Organize and track all Lab inventory
- Implement and Maintain Daily Logs
- Enforce all PPE and cleanliness policies
- Coordinate with the Director of Operations and to manage and complete any and all tasks necessary for the continued operation of the Lab at a very high level.
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## — Edibles - MIPs

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- Chews
- Chocolate Bars
- Hard Candies (Coming Soon)



# Kitchen - Product Recall Outline

Written By: Hannah Ward

## INTRODUCTION

Every Food Distributor and Food Manufacturer must track the products they manufacture and distribute.

What is a Food Recall?

Food producers use many controls to ensure the safety of their products. Despite their best efforts, however, sometimes unsafe food products, or those that do not meet legislative requirements, make their way into the marketplace. When an unsafe or violative food product has left the control of the manufacturer/distributor, it must be removed from the market. This process of removing the product is called a recall.

Any food recall has the following aims:

- Stopping the delivery and sale of the product in question;
- Informing the appropriate regulatory agencies; and
- Proper and timely removal from the marketplace of the product in question.

## — Recall Team

- Recall Team consists of people responsible for the following items:
  - Decision Making
  - Quality Assurance/Technical Advisory
  - Media Communication
  - Complaint Investigation
  - Contacting Customers
  - Contacting your regulatory body (FDA, FSIS or CFIA)
  - Legal Counsel

## — Complaint File

- When a complaint is received, it is important to record the details and start an investigation immediately. Early action on your part may enable you to identify potentially unsafe products and correct problems or enable you to stop selling/distributing the product until it is determined that it is safe.
- Consumer Complaint Form
- Complaint Investigation Form

## — Recall Contact List

- Must include List of Customers, Suppliers & Regulatory Agencies



## — Traceability

- The more specific our records are, the more targeted we can be with safety recall. A traceability system is vital to this.
- When products are ordered & received from a supplier, fill out "**Product Receipt Record Log**"
- When Raw Materials are ordered, received & used in a finished product, all of the important tracking information should be recorded in the '**Raw Material Input Log**'
- The '**Production Numbers Record**' log is for inputting lot numbers of finished goods. This allows us to track each product and the raw material goods which went into each lot number.

## — Production Amounts

- Production Reconciliation Template provides us with the ability to reconcile the quantity of product that was produced with the amount that was shipped & in our stockpiles.

## — Shipping and Sales Records

- **Product Distribution Record** this log can be filled in with general information as we have it. Depending on if products were sold wholesale or transferred to Retail for customer sale , the followup will be slightly different.

## — Recalled Product Records

- When and if a product is ever recalled, we need to keep detailed records about the product & the corrective action steps taken.

## — Recall Procedure

- Identify the Concern
- Assemble the recall team
- Notify your applicable regulatory agencies
- Assemble the recall team
- Segregate (put on hold) affected products that are in your control
- Prepare a distribution list
- Prepare a press release (if necessary)
- Notify customers/distributors (informing them what to do with the recall products)

## — Procedure Continued

- Control recalled products and decide what to do with them
- Dispose of recalled products
- Fix the cause of the recall
- Use the “Manufacturer Recall Procedure” to use when a recall occurs. The checks within the document will ensure that no steps during a recall have been overlooked.

## — Communications Log

- This document shall be used during a recall to document every call that is made to every effected Customer and Regulatory Agency.
- The **Notice of Recall Document & Press Release Documents** can be used if it is necessary depending on the scope of distribution of the product. This will be determined on a case by case basis.

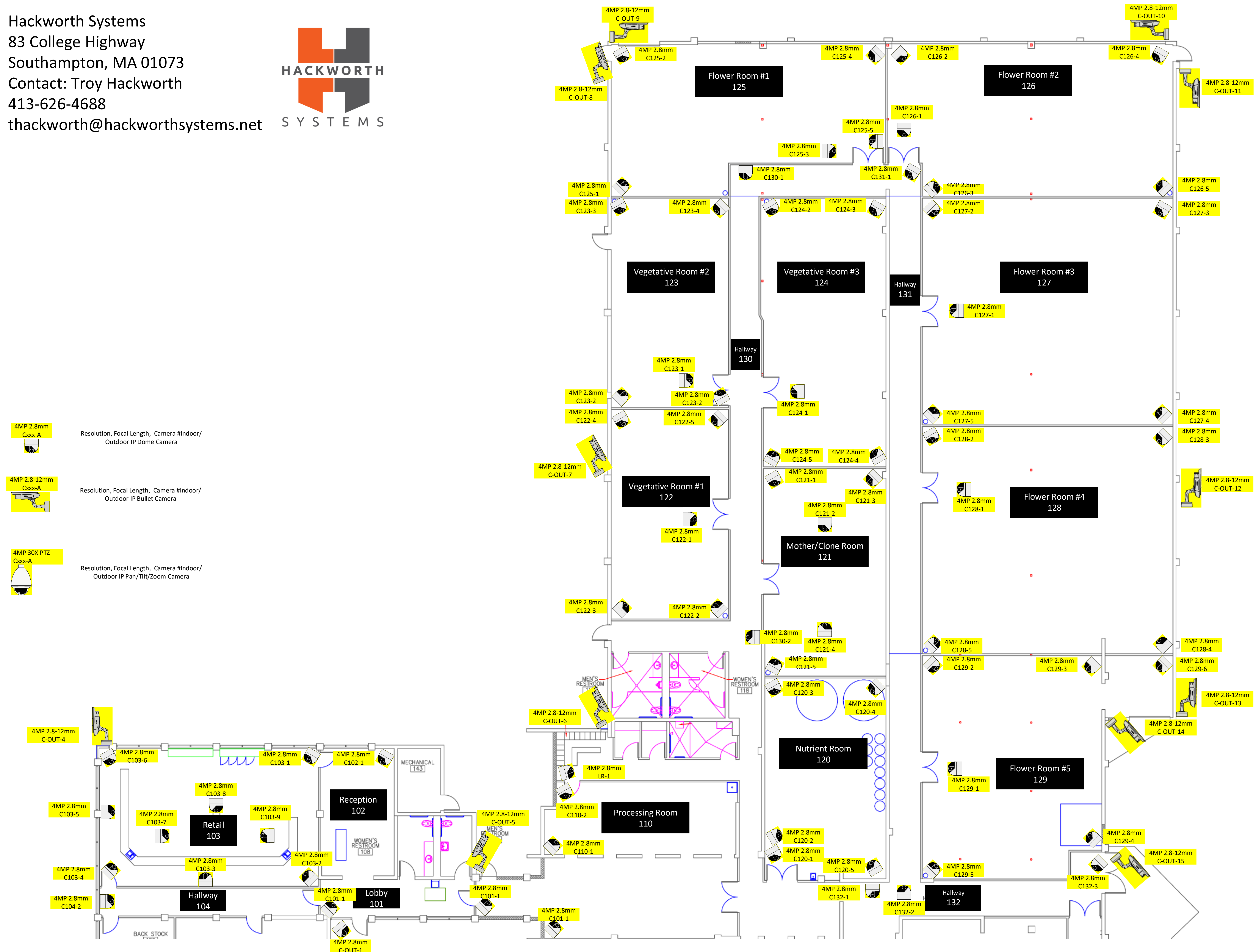
## — Recall Effectiveness

- A company recalling a product is responsible for notifying all customers who bought the affected products.
- They should also verify that all customers have stopped the distribution of the affected products, and that all recalled products have been returned to the Manufacturers' control or other designated area as instructed in the recall notification.
- In order to ensure all effected Customers know of the recall, an "Effectiveness Check" questionnaire can be downloaded and used. This document is used to contact each Customer to ensure they have received notice and are aware of the recall.

## — Testing the Recall Program

- Mock recalls test a company's ability to recall products without actually recalling them. Mock recalls are strongly suggested and should be tested on a regular basis. The goal is to be able to identify every affected lot, know exactly where it is and know who to contact to bring it back.
- A mock recall can be an eye-opener: some Manufacturers discover that they are not as prepared as they thought.
- Download the "Mock Recall Record" and use it during every Mock Recall. They say "Practice makes Perfect". You want to be ready in the event that your company does have to perform a recall.

thackworth@hackworthsystems.net   S Y S T E M S



FLOOR PLAN A

### A1.1





- C

Keypad
- C

Door Contact
- C

Motion Detector
- C

Glassbreak Detector
- C

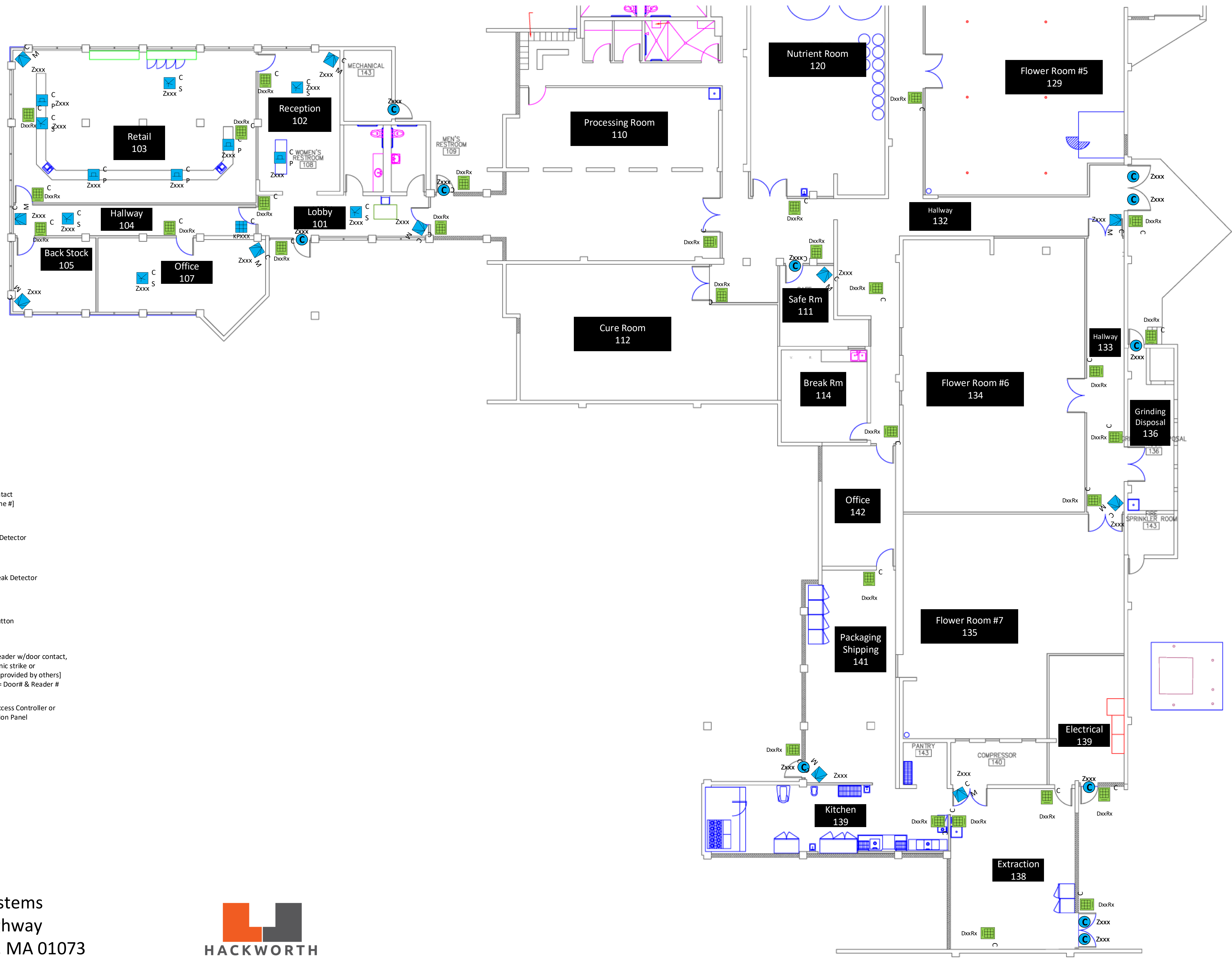
Panic Button
- C



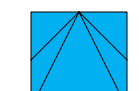

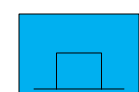



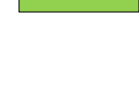
Card Reader w/electronic strike or similar[provided by others]
- C

Card Access Controller or Expansion Panel
- B







-  C Keypad
-  Zxxx Door Contact [Zxxx=Zone #]
-  C Motion Detector
-  Zxxx M Glassbreak Detector
-  C S Panic Button
-  Zxxx P
-  C Card Reader w/door contact, electronic strike or similar[provided by others] DxxRx = Door# & Reader #
-  C Card Access Controller or Expansion Panel
-  B

Hackworth Systems  
 83 College Highway  
 Southampton, MA 01073  
 Contact: Troy Hackworth  
 413-626-4688  
 thackworth@hackworthsystems.net



AJS  
 AJS

FLOOR PLAN B

A1.2





- FACP

Fire Alarm Control Panel
- FAAP

Fire Alarm Annunciator Panel
- FAC

Fire Alarm Communicator
- NAC

xx

Notification Circuit Power Booster, extender panel #
- F

xxx

Manual Pull Station w/Point ID
- S

xxx

Smoke Detector w/Point ID
- CO

CO Detector
- CO

xxx

Combo Smoke/CO Detector w/Point ID & Sounder Base
- xxx

Heat Detector w/Point ID
- S

xxx

Duct Smoke Detector w/Point ID
- AIM F

xxx

Monitor Module for Sprinkler Waterflow Switch w/Point ID
- AIM A

xxx

Monitor Module for Ansul System w/Point ID
- AIM T

xxx

Monitor Module for Sprinkler Tamper Switch w/Point ID
- RM A

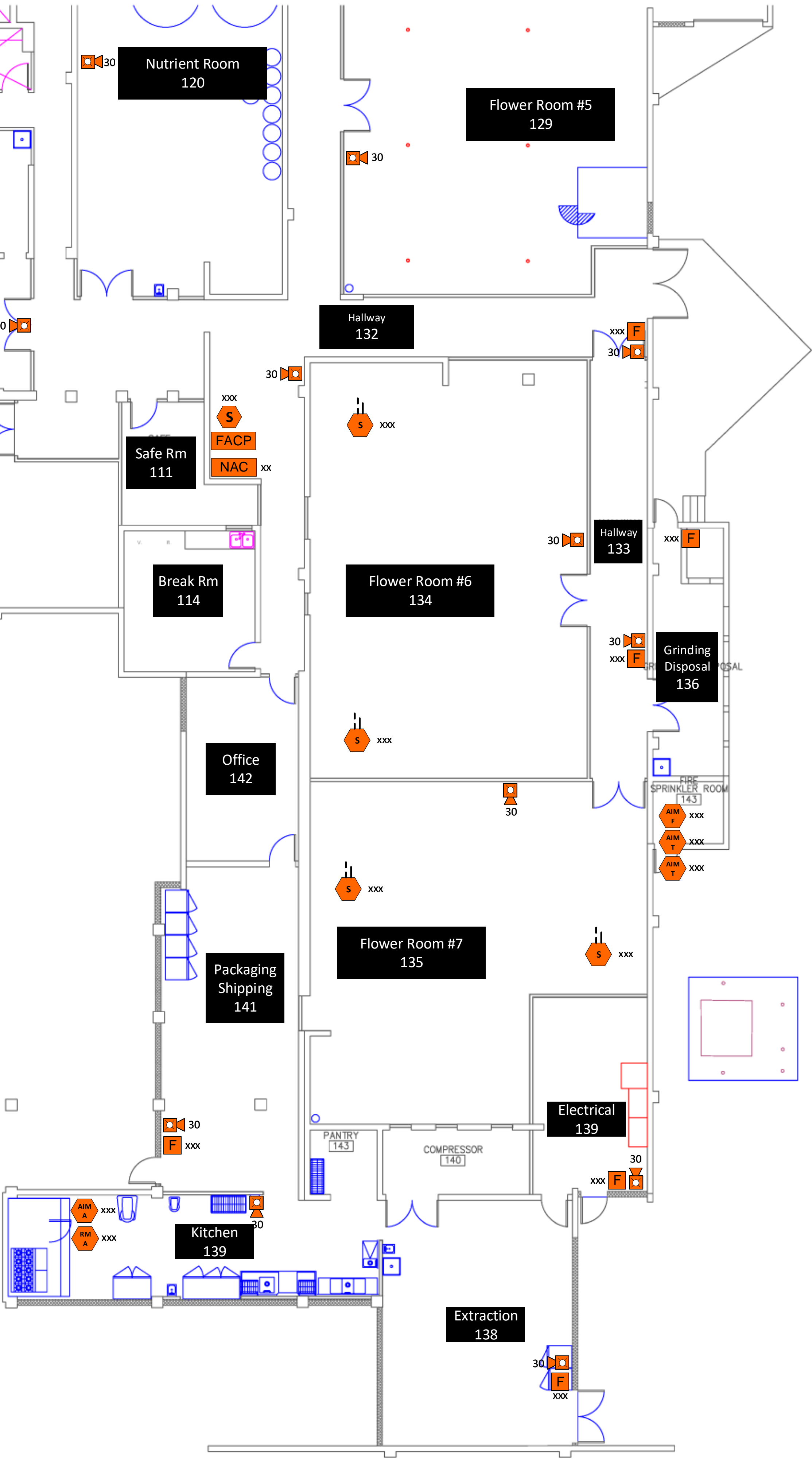
xxx

Relay Module for Ansul System w/Point ID
- xxx

Sounder/Strobe w/Candela Setting
- xxx

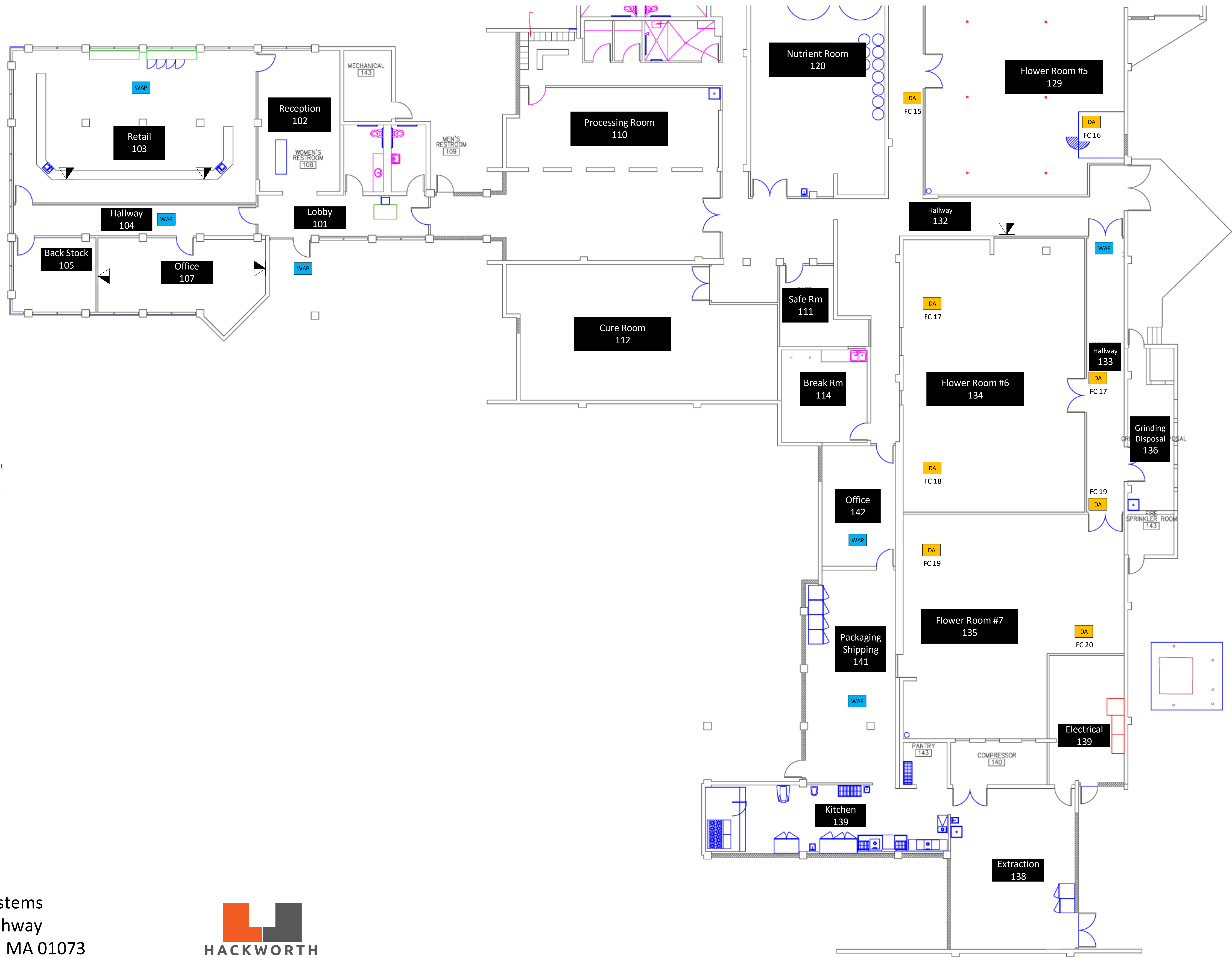
Strobe w/Candela setting

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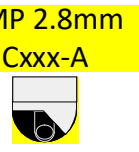


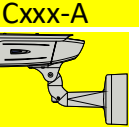
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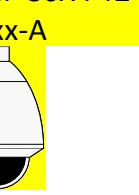


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Southampton, MA 01073  
Contact: Troy Hackworth  
413-626-4688  
thackworth@hackworthsystems.net



- 

4MP 2.8mm  
Cxxx-A
- Resolution 4MP, Focal Length 2.8mm, Camera  
#Indoor/Outdoor IP Dome Camera
- 

4MP 2.8-12mm  
Cxxx-A
- Resolution 4MP, Focal Length 2.8-12mm,  
Camera #Indoor/Outdoor IP Bullet Camera
- 

4MP 30X PTZ  
Cxxx-A
- Resolution 4MP, Focal Length, Camera  
#Indoor/Outdoor IP Pan/Tilt/Zoom Camera

**HUNTLEY**  
HUNTLEY ASSOCIATES, P.C.  
LAND SURVEYORS, CIVIL/SITE/STRUCTURAL ENGINEERS  
30 INDUSTRIAL DRIVE EAST  
NORTHAMPTON, MASSACHUSETTS 01060



**MONTAGUE GROW**  
253 MILLERS FALLS ROAD,  
MONTAGUE, MA 01376



**CHRISTIAN C. CAREY**  
ARCHITECT, P.C.  
Architecture • Historic Preservation  
93 Sykes Park Road, Ste. 200, Westfield, MA 01092  
94 North Elm Street, Westfield, Massachusetts 01085  
413-562-0466

DESIGN: MJS/CCC  
COMPS: N/A  
DRAFTING: MJS/DL  
CHECKED: MJS/CCC

**FLOOR PLAN**

PROJECT NO:  
DRAWING NO:  
DATE: REVISED 5-29-19  
SHEET NO.  
**A1.2**

