



Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR281344
Original Issued Date: 09/24/2018
Issued Date: 09/10/2020
Expiration Date: 09/24/2021

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Alternative Therapies Group, Inc.

Phone Number: 617-359-4554 Email Address: Dan@ATGMA.org

Business Address 1: 107 Elm Street

Business Address 2:

Business City: Salisbury

Business State: MA

Business Zip Code: 01952

Mailing Address 1: 24R Pleasant St, Unit 2

Mailing Address 2:

Mailing City: Newburyport

Mailing State: MA

Mailing Zip Code: 01950

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: yes

Priority Applicant Type: RMD Priority

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number: RPA201825

RMD INFORMATION

Name of RMD: Alternative Therapies Group, Inc.

Department of Public Health RMD Registration Number: 001

Operational and Registration Status: Obtained Final Certificate of Registration and is open for business in Massachusetts

To your knowledge, is the existing RMD certificate of registration in good standing?: yes

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 50

Percentage Of Control: 50

Role: Executive / Officer

Other Role:

First Name: Christopher

Last Name: Edwards

Suffix:

Gender: Male

User Defined Gender:

What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 50

Percentage Of Control:

50

Role: Executive / Officer

Other Role:

First Name: Julio

Last Name: Fuentes

Suffix:

Gender: Male

User Defined Gender:

What is this person's race or ethnicity?: Hispanic, Latino, or Spanish (Mexican or Mexican American, Puerto Rican, Cuban, Salvadoran, Dominican, Colombian)

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 3

Percentage Of Ownership:

Percentage Of Control:

Role: Executive / Officer

Other Role:

First Name: George

Last Name: Christy

Suffix:

Gender: Male

User Defined Gender:

What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 4

Percentage Of Ownership:

Percentage Of Control:

Role: Executive / Officer

Other Role:

First Name: Derek

Last Name: Brock

Suffix:

Gender: Male

User Defined Gender:

What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 5

Percentage Of Ownership:

Percentage Of Control:

Role: Executive / Officer

Other Role: President

First Name: Daniel

Last Name: Talbot

Suffix:

Gender: Male

User Defined Gender:

What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 107 Elm St

Establishment Address 2:

Establishment City: Salisbury

Establishment Zip Code: 01952

Approximate square footage of the establishment: 4971

How many abutters does this property have?: 15

Have all property abutters been notified of the intent to open a Marijuana Establishment at this address?: Yes

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan to Remain Compliant with Local Zoning	Plan to Remain Compliant with Local Zoning - Salisbury.pdf	pdf	5b5916f1fbbc11284d02e89f	07/25/2018
Community Outreach Meeting Documentation	Attachment-A.pdf	pdf	5b591718f002a22861568c4c	07/25/2018
Community Outreach Meeting Documentation	Attachment-B1.pdf	pdf	5b59171c12ba8f281ff52343	07/25/2018
Community Outreach Meeting Documentation	Attachment-B2.pdf	pdf	5b5917251ccce4282510a2b5	07/25/2018
Community Outreach Meeting Documentation	Attachment-C.pdf	pdf	5b5917298a93fd282f3e347e	07/25/2018
Community Outreach Meeting Documentation	Community-Outreach-Meeting-Attestation-Form.pdf	pdf	5b59172eaf8f7f28392e8681	07/25/2018
Certification of Host Community Agreement	Host-Community-Agreement-Certification-Form-signed.pdf	pdf	5b7348f003a477392d0a28c7	08/14/2018

Total amount of financial benefits accruing to the municipality as a result of the host community agreement. If the total amount is zero, please enter zero and provide documentation explaining this number.: \$409816.31

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Plan to positively impact the community.pdf	pdf	5ae37fb31a56be7ea2dd0c47	04/27/2018
Plan for Positive Impact	Plan to positively impact the community - updated.pdf	pdf	5b88005caa953e3937b5a728	08/30/2018

ADDITIONAL INFORMATION NOTIFICATION

Notification: I understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role:

Other Role:

First Name: Christopher Last Name: Edwards Suffix:

RMD Association: RMD Owner

Background Question: no

Individual Background Information 2

Role: Other Role:

First Name: Julio Last Name: Fuentes Suffix:

RMD Association: RMD Owner

Background Question: no

Individual Background Information 3

Role: Other Role:

First Name: George Last Name: Christy Suffix:

RMD Association: RMD Manager

Background Question: no

Individual Background Information 4

Role: Other Role:

First Name: Derek Last Name: Brock Suffix:

RMD Association: RMD Manager

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	Articles of Organization.pdf	pdf	5ae382d6660eb50d8b6ff368	04/27/2018
Bylaws	Bylaws - Alternative Therapies Group, Inc.pdf	pdf	5ae382e74e185c0d9f42ad96	04/27/2018
Department of Revenue - Certificate of Good standing	DOR-Certificate-of-Good-Standing.pdf	pdf	5ae3830347ddff7eac662af1	04/27/2018
Secretary of Commonwealth - Certificate of Good Standing	18050090210.pdf	pdf	5afc98db11a2fe04237f736a	05/16/2018
Articles of Organization	ATG - Articles of Entity Conversion - CERTIFIED-1.pdf	pdf	5afc98dc4acea511a8369348	05/16/2018

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Department of Unemployment Assistance - Certificate of Good standing	ATG MA Dept of Unemployment Assistance Certificate of Compliance 7-13-20.pdf	pdf	5f0ce33a8767bb7013caf5f7	07/13/2020
Department of Revenue - Certificate of Good standing	MDOR Certificate of Good Standing 7-13-20.pdf	pdf	5f10adef1f0df7704a5df6f5	07/16/2020
Secretary of Commonwealth -	Secretary of State Cert of Good Standing	pdf	5f120f8862a1117473fb6f4d	07/17/2020

Massachusetts Business Identification Number: 001324751

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	Business PlanF.pdf	pdf	5f1f5b029a9ccf70437a7650	07/27/2020

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Diversity plan	Diversity Plan-updated.pdf	pdf	5b59188ef002a22861568c56	07/25/2018
Maintaining of financial records	Policy & Procedures MAINTAINING FINANCIAL RECORDS 7-22-20.pdf	pdf	5f189a5ac124977059ce75bd	07/22/2020
Security plan	Policy & Procedures SECURITY PLAN - HOURS OPERATION - AFTER HOURS CONTACTS 7-22-20.pdf	pdf	5f189a681f0df7704a5e0932	07/22/2020
Personnel policies including background checks	Policy & Procedures PERSONNEL POLICY EMPLOYEE MANUAL V 7.1.pdf	pdf	5f18a08d4601b5701e614fda	07/22/2020
Personnel policies including background checks	Policy & Procedures PERSONNEL POLICY INCLUDING BACKGROUND CHECKS 7-20-20.pdf	pdf	5f18a09acb97e3700c5351d8	07/22/2020
Plan for obtaining marijuana or marijuana products	Policy & Procedures PLAN FOR OBTAINING MARIJUANA OR MARIJUANA PRODUCTS 7-20-20F.pdf	pdf	5f1f5b415272ec7447e7b4db	07/27/2020
Separating recreational from medical operations, if applicable	Policy & Procedures SEPARATING RECREATIONAL FROM MEDICAL OPERATIONS 7-20-20F.pdf	pdf	5f1f5b4f8767bb7013cb1f29	07/27/2020
Restricting Access to age 21 and older	Policy & Procedures RESTRICTING ACCESS TO 21 OR OLDER 7-20-20F.pdf	pdf	5f1f5b709a9ccf70437a7654	07/27/2020
Security plan	Policy & Procedures SECURITY PLAN 072020F.pdf	pdf	5f1f5b7e54fcae70383aa313	07/27/2020
Storage of marijuana	Policy & Procedures STORAGE OF MARIJUANA 7-23-20F.pdf	pdf	5f1f5b991c4abd74527f5132	07/27/2020
Transportation of marijuana	Policy & Procedures TRANSPORTATION OF MARIJUANA 7-2020F.pdf	pdf	5f1f5ba69adff6745ddd6729	07/27/2020
Inventory procedures	Policy & Procedures INVENTORY PROCEDURES 7-2020.pdf	pdf	5f1f5bbe44827474644ead6b	07/27/2020
Quality control and testing	Policy & Procedures QUALITY CONTROL & TESTING 7-24-2020F.pdf	pdf	5f1f5be573630b702d45e100	07/27/2020
Qualifications and training	Policy & Procedures QUALIFICATIONS &	pdf	5f1f5bf14601b5701e615bab	07/27/2020

	TRAINING 7-20-20F.pdf			
Dispensing procedures	Policy & Procedures DISPENSING PROCEDURES 7-20-20F.pdf	pdf	5f1f5bfd9a9ccf70437a7659	07/27/2020
Record Keeping procedures	Policy & Procedures RECORD KEEPING PROCEDURES 7-22-20F.pdf	pdf	5f1f5c281c4abd74527f5136	07/27/2020
Prevention of diversion	Policy & Procedures PREVENTION OF DIVERSION 7-22-2020F.pdf	pdf	5f1f5c359adff6745ddd672d	07/27/2020

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

Adequate Patient Supply Documentation:

Document Category	Document Name	Type	ID	Upload Date
	MJ Retailer Specific Requirements- ADEQUATE PATIENT SUPPLY.pdf	pdf	5f1f5d1a9adff6745ddd6731	07/27/2020

Reasonable Substitutions of Marijuana Types and Strains Documentation:

Document Category	Document Name	Type	ID	Upload Date
	Reasonable Substitutions of Marijuana Types and Strains DocumentationF.pdf	pdf	5f207f54fcae70383aa5b9	07/28/2020
	ATG strain guide draft FINALF.pdf	pdf	5f207fd61f0df7704a5e1836	07/28/2020
	Inventory Coverage 2020-07-28T1533F.pdf	pdf	5f207fdac97e3700c5360a8	07/28/2020
	Reorder Report BrandVendor Toggle 2020-07-28T1522F.pdf	pdf	5f207fde5272ec7447e7b748	07/28/2020

ATTESTATIONS

I certify that no additional entities or individuals meeting the requirement set forth in 935 CMR 500.101(1)(b)(1) or 935 CMR 500.101(2)(c)(1) have been omitted by the applicant from any marijuana establishment application(s) for licensure submitted to the Cannabis Control Commission.: I Agree

I understand that the regulations stated above require an applicant for licensure to list all executives, managers, persons or entities having direct or indirect authority over the management, policies, security operations or cultivation operations of the Marijuana Establishment; close associates and members of the applicant, if any; and a list of all persons or entities contributing 10% or more of the initial capital to operate the Marijuana Establishment including capital that is in the form of land or buildings.: I Agree

I certify that any entities who are required to be listed by the regulations above do not include any omitted individuals, who by themselves, would be required to be listed individually in any marijuana establishment application(s) for licensure submitted to the Cannabis Control Commission.: I Agree

Notification: I Understand

I certify that any changes in ownership or control, location, or name will be made pursuant to a separate process, as required under 935 CMR 500.104(1), and none of those changes have occurred in this application.: I Agree

I certify that to the best knowledge of any of the individuals listed within this application, there are no background events that have arisen since the issuance of the establishment's final license that would raise suitability issues in accordance with 935 CMR 500.801.: I Agree

I certify that all information contained within this renewal application is complete and true.: I Agree

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

COMPLIANCE WITH POSITIVE IMPACT PLAN
Progress or Success Goal 1

Description of Progress or Success: Plan to positively impact the community: Update
Alternative Therapies Group, Inc.
License: MR281344

Goal: To reduce barriers to entry in the commercial adult-use cannabis industry.

Measurement and Accountability: ATG established a goal for at least 5% of our staff to be comprised of individuals from disproportionately impacted communities. The criteria we used for this measurement include past or present residents of disproportionately impacted communities, individuals with past marijuana convictions, or individuals with a parent or spouse with a past marijuana conviction.

Workforce Analysis-update

15% of ATG's employee total staff (202 employees) from last license renewal (from June 2019-July 2019), meet at least one of these criteria. Currently, 100%, (2 of 2) of ATG's General Managers are from areas of disproportionate impacted areas. Out of 119 new hires since June 2019, 15% were individuals who meet these criteria. ATG met and exceeded overall goal of 5%.

Supporting Documentation: Notarized attestation from ATG Management.

Goal: Provide skills assessment and job opportunities for qualified individuals from disproportionately impacted communities. Conduct and/or participate in career fairs in disproportionately impacted communities at least twice per year. The communities targeted by ATG are Haverhill and Lynn, which are the nearest disproportionately impacted communities defined by the CNB.

Success Update: ATG continued with its commitment to host job fairs in disproportionately impacted communities in Lynn and Haverhill this past year. Targeted recruiting efforts in those focused areas, led to successful job fair turn outs and positive hiring outcomes.

Hiring Managers followed anti-discriminatory hiring guidelines and upheld consistent selection standards, as enforced by the Equal Opportunity Employment Commission. Hiring managers followed a consistent evaluation process, that looked at transferable job skills and qualifications; to help break hiring barriers in the cannabis industry.

•15% of all new ATG employees (June 2019-July 2020) are from areas of disproportionately impacted areas. ATG exceeded hiring goal of 5% from disproportionate impacted areas.

•All hired individuals will receive extensive training, to support career development within the cannabis industry.

•Hiring Managers will continue to be trained on best hiring practices including the importance of following anti-discriminatory employment laws and guidelines. Hiring Managers also will participate in ATG's Diversity training, that incorporates the positive impact of a diverse workforce.

•ATG will continue its commitment to aim recruitment efforts in disproportionately impacted areas and continue to host job fairs within these communities.

Supporting documentation: ATG's Diversity Training, which incorporates anti-discriminatory hiring practices.

Supporting documentation: Diversity in the Workplace Training-Skills Path

Goal: Providing on-the-job training and opportunities for advancement to qualified employees from disproportionately impacted communities. The criteria we used for this measurement includes past or present residents of areas disproportionately impacted, individuals with past drug convictions, and/or individuals with a parent or spouse with a past drug conviction.

Program Success or Measurement:

•Measurement Goal: ATG exceeded its goal of at least 25% of staff from disproportionately impacted communities qualifying for advancement opportunities within the organization.

•Success Update: 38% of ATG's staff from disproportionate areas, since last license renewal, received promotions.

Supporting Documentation: Notarized attestation from ATG Management.

ATG's Diversity Training-Includes anti-discriminatory hiring practices.

Diversity in the Workplace-Skillpath

Positive Impact Attestation

COMPLIANCE WITH DIVERSITY PLAN

Diversity Progress or Success 1

Description of Progress or Success: Application Renewal Progress Report

Alternative Therapies Group, Inc.

License: MR281344

ATG has a diverse workforce which includes veterans, women in leadership roles, individuals with disabilities and employees who identify as LGBTQ. Compensation is equitable throughout the company adhering to the Massachusetts Equal Pay Act (MEPA), and the Equal Pay Act of 1963 guidelines. Compensation is regularly reviewed by ATG's Chief Financial Officer, ensuring equal pay for all employees and that equal pay guidelines are met.

The purpose of ATG's diversity plan is to promote and support a work environment which values and affirms equal opportunity, diversity and inclusion in accordance with ATG principles of equity, fairness and social justice. Since our previous license renewal, we have implemented additional strategies that aim to bring us closer to this goal. Below we provide an overview of our strategic plan for diversity in the workforce, as well as specific metrics that highlight our progress and success.

The commission has identified minorities, women, veterans, people with disabilities and people of all gender identities and sexual orientations as the specific demographics a diversity program should include. The statistics provided for the purpose of this progress report have been gathered through voluntary EEO reporting disclosures. Employees are asked to (optionally) self-identify to these demographics when initially hired. Due to the Covid-19 pandemic, EEO-1 reporting has been postponed until March 2021 by the Equal Employment Opportunity Commission (EEOC). At that time ATG will submit workforce demographics for federal reporting requirements.

Diversity Progress Report:

Since last renewal, ATG's Human Resources Manager has continued focus and commitment to increase and maintain a diversified workforce. The HR Manager understands the importance of a diverse workforce and has created and implemented Diversity Training for all of ATG's employees. The training includes encouraging inclusiveness, overcoming inclusion barriers and preventing adverse impact. To support our women leaders, ATG sponsored and encouraged our women management team to attend a Women in Leadership conference on November 14th, 2019, in Portsmouth, NH. Additionally, ATG's leadership team also participated in a Diversity in the Workplace webinar, to further educate our leaders on inclusion and a diverse workforce. These trainings are strategies ATG took to help promote a positive impact to our employees along with increasing a diversified workplace.

ATG's HR Manager has been trained in Diversity and holds a certification in HR management. Course requirements and trainings that include:

- Legal Context of Human Resources.-Includes anti-discrimination laws & unlawful behaviors
- Staffing and Recruiting.-Includes preventing discrimination in the hiring process
- Workplace diversity.-Includes special measures to embrace women and underrepresented groups in the workplace

Feedback loop & open-door policy: ATG has continued its process to receive confidential feedback from staff and the management team. This

includes periodic check-ins, exit interviews and a weekly meeting with managers meet and can discuss any pertinent issues and work on resolution. We have continued our open-door policy for all of our staff. Employees are free to meet and communicate any concerns with HR without any fear of reprisal. Employees are educated during new hire orientation of ATG's anti-retaliation policy.

Employee Handbook: The ATG employee handbook includes a zero-tolerance policy with regard to discrimination in the workplace.

Review of existing policies and practices: ATG conducts periodic reviews of existing policies and practices to ensure we are compliant with laws and best practices related to equity and diversity.

We adhere to the following discrimination laws:

- American w/ Disabilities Act-ADA
- The Equal Pay Act of 1963/ MA Equal Pay Act 2018
- FMLA
- Fairness to Pregnant Workers Act
- Civil Rights Act of 1991
- Title VII of Civil Rights Act-discrimination in the workplace
- Age Discrimination in Employment Act 1967(ADEA)

Non-discriminatory interview practices: We conducted several informal and formal training sessions with our management team on non-discriminatory practices, including ADA guidelines with regard to recruiting and interviewing prospective employees. This non-discriminatory training is also provided for the management of existing employees as well. Employees follow a consistent evaluation process, in which the selection criteria focus on job-related qualifications, experience and the ability to perform essential job duties with or without reasonable accommodations.

Measurement and Accountability: While there is always room to improve, ATG is proud of our progress to date. Below are some key metrics we are consistently working to improve:

Increasing the number of individuals falling into the above-listed demographics working in the establishment:

Minorities:

- 47% increase of minority employees since last license renewal.
- 33% increase of minority new hires since last license renewal.

Women:

- 147% increase of women employees since last license renewal.
- 45% increase of women new hires since last license renewal.

Veterans:

- 38% increase of veteran new hires since last license renewal.

Disabilities:

- 33% increase of employees with disabilities new hires since last license renewal.

LGBTQ:

- 15% of ATG's overall workforce, chose to self-identify as a part of the LGBTQ community.

Providing opportunities for advancement & increasing the number of individuals falling into the above-listed demographics in management and executive positions:

- 50% increase in minority promotions since last license renewal.
- 119% increase in women promotions since last license renewal.
- A minority woman was promoted to Director of Retail Operations, since last license renewal.
- A veteran was hired as Director of Operations, since last renewal.
- One employee that is a Social Equity Applicant, since last renewal.

Supporting Documentation: Certificate of completion-Women in Leadership Conference, EEO Self-identification form

HOURS OF OPERATION

Monday From: 9:00 AM	Monday To: 7:00 PM
Tuesday From: 9:00 AM	Tuesday To: 7:00 PM
Wednesday From: 9:00 AM	Wednesday To: 7:00 PM
Thursday From: 9:00 AM	Thursday To: 7:00 PM
Friday From: 9:00 AM	Friday To: 7:00 PM
Saturday From: 9:00 AM	Saturday To: 7:00 PM
Sunday From: 9:00 AM	Sunday To: 7:00 PM

Plan to Remain Compliant with Local Zoning

Each time ATG has approached a potential host community about the possibility of siting a marijuana-related facility, we have made an effort to meet with as many members of the administration as possible, especially the Mayor/Town Manager, Council/Selectmen, Planning, and Police Department. In each case, the Planning Department and other officials have determined that our proposed location complies with local zoning and building codes. Before any construction begins, we will engage a code review expert to ensure that our proposed plans are compliant before applying for a building permit. We maintain close relationships with all relevant stakeholders throughout the siting or modification of a facility. ATG will continue to ensure compliance through monitoring of changes to local codes and zoning ordinances, as well as ongoing collaboration with elected officials and inspectors.

The Town of Salisbury's adult use marijuana zoning ordinance requires a special permit, issued by the Planning Board. ATG has applied for that special permit, and is scheduled to appear before the Salisbury Planning Board August 22. With receipt of that permit, all local licensing requirements will have been satisfied.

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Sunday paper.....5pm Friday

weeklies:

Carriage Towne News: 12pm Friday
Andover Townsman, Derry News &
Haverhill Gazette: 5pm Tuesday

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ATTACHMENT A

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2 YR/old with Trach
22 YR/old with GT
Malden: 17 YR/old with Trach/Vent
Methuen: 17 YR/old with Trach/Vent
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Contact Family Lives at 508-475-0493

IMMEDIATE OPENING!

IF YOU ARE LOOKING FOR A POSITION AS A CARE GIVER PLEASE CHECK OUT THE **ADULT CARE** SECTION IN THE BUSINESS AND SERVICE DIRECTORY PEOPLE LOOKING FOR PCAS, HEALTH AIDES, CNAS HAVE ADS RUNNING AND COULD USE YOUR HELP

First Run

PROFESSIONAL ELDER CARE SERVICE PROVIDER

2 POSITIONS AVAILABLE:
1 - Part-time/20 hours per week
1 - Full time - 37.5 hours per week

Position includes assessing the needs of the elders in an independent living community on the North Shore, and to work with them to establish linkages to needed supportive services to maintain resident's independent living status.

Care professional maintains regular contact with residents, monitoring the delivery of supportive services desired or required by the residents. Works with residents and housing management staff to develop, support, and implement activities, functions and/or programs that promote a positive social climate.

Please send a cover letter and resume to:
susanjmacneil@yahoo.com EOE

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↑ ↑ ↑ ↑ ↑ ↑

John's Oil

Home heating oil. Dyed Red Off Road Diesel available. Fuel Assistance Welcome
www.johnsoil.com
978-777-4205

FURNITURE

ABSOLUTE BARGAIN !!!! NEW IN PLASTIC BEAUTIFUL QUEEN PILLOW TOP MATTRESS PAID \$750. SELL \$199. CASH ONLY!
Can deliver, 603-275-4194

HOUSEHOLD GOODS

DISHWASHER portable heavy duty holds lots of dishes and pans A1 Condition Paid \$800 + asking \$400. New 2 patio folding chairs padded leather seats & back \$15 each \$20 for both. Call 978-834-5298/978-792-0670

INDUSTRIAL/MACHINERY

FLOOR MODELS: DELTA 12" vertical disk sander, 1/2 hp. \$225B0. ROCKWELL Radial arm saw 10" auto brake \$225B0.
CALL 617-791-0615 Plaistow, NH

MISC ITEMS WANTED

STAIRLIFTS WANTED
TO BUY, in good condition.
Call Richard 603-236-1227

WANTED: Baseball card collections. All sports, all years. Call (978) 857-3005

MISC MERCHANDISE

CANNON AE1 CAMERA with lenses. Excellent condition. Takes beautiful pictures. Make me an offer. Call 978-984-7143, Andover.

CRAFTSMAN 8" Circular Bench Saw with table \$95 best offer Electric Sanders & Toro blow vac. Call (978) 686-4883

Drill press floor model FLEETWOOD 1725 RPMS heavy duty 5 speed with table \$225 bo. 2-Arbor presses 30" H, all steel 1@ \$125 & 1 @ \$150 or B0 617-791-0615 Plaistow, NH

HAND TOOLS WANTED
Stanley planes-chisels-axes-calipers-clamps hammers, anvils, etc-useful tools, All Trades. Collections, estate lots. 1-888-405-2007 LVM

LAWN MOWER: CubCadet 20" cut, self propelled, mulching \$195. * Weed eater 20" cut push, \$95 Both are gas, like new condition and serviced Call (508) 451-0515

POWER WHEELCHAIR C500 Permobil powered wheelchair. Great cond. Many different features like sit to stand and various speeds and other features.\$1,100 (978) 857-1057

SAMSUNG WASHER/DRYER STACK Samsung Washer/Dryer Combo, Heavy Duty, Like New. 28w x 36h. \$800 Call: 610-955-9088

TOSHIBA COLOR TV 27 INCH 70. FRIGIDARE AIR-CONDITIONER sleeve unit, 10,000 BTUs \$350. CALL 978-778-0713

WARNING

If you get an email or cashiers check for more than the asking price for your pet, vehicle or merchandise asking you to refund the difference it is likely a scam. Seller Beware!

MISC MERCHANDISE

LAWN MOWER MTD 22" 3.75HP, starts on 1st pull.\$55. * Toro leaf blower/vac with attachments \$35. Call (603) 894-1435

PETS & FREE PETS

★★★★★★★★★★★★

AMERICAN BULLY Pocket American Bully Puppies for sale. ABKC registered. 2 males and 2 females left. 978-771-7085 for pics and info

ATTENTION! ATTENTION!

Beware of anyone replying to your ad offering to send you a check for shipping and you sending them back the difference.
Also beware when responding to classified ads that ask you to send shipping cost.
Possible scam!

CORGI puppies; AKC Registered, Health Certificates. Parents on premise, Great family companions, very entertaining. Ready 6/29 and 9/11/2018. \$1000 Call (603) 446-4310

FRENCHTON PUPPIES - READY NOW!
2 females, 1 male
wormed, 1st shots, health certificate. \$900. Call Bonnie, in NH, (802) 489-0416

GERMAN SHEPHERD PUPS Quality Large boned, family raised, very friendly, shots, vet checked. \$800 & up. Call 603-435-9344

First Run

ICCF REGISTERED ITALIAN MASTIFF PUPPIES 4 Beautiful females available. Family protection, show quality out of champion lines! Must see you will not be disappointed. \$2,000 call (978) 943-9833? Facebook- Milton Colon

LABRADOR RETRIEVER PUPS AKC chocolate & black lab pups for sale. Big, beautiful, blocky pups. Raised in home with family. Mom and Dad on premises. First shots, wormed and full health guarantee. \$900. Ready July 13th. No Breeders please. Call Donna or Randy at 207-998-1132, Maine

WARNING

If you get an email or cashiers check for more than the asking price for your pet, vehicle or merchandise asking you to refund the difference it is likely a scam. Seller Beware!

PUBLIC NOTICES

Take notice, they could affect you!

PUBLIC NOTICES

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for July 25, 2018 at 6:00pm at 107 Elm St, Salisbury, MA 01952. The proposed adult-use retail facility is anticipated to be located at 107 Elm Street, Salisbury, MA 01952. There will be an opportunity for the public to ask questions. NT – 7/17/18

TOWN OF SALISBURY NOTICE OF HEARING

Case No. 18-18
The Salisbury Board of Appeals will hold a public hearing on **Tuesday, July 24, 2018 beginning at 7:00 PM** at the Salisbury Town Hall, 5 Beach Rd., Salisbury, MA, to act on a Petition for Relief – Special Permit with respect to the Salisbury Zoning Bylaw, Section 300-9 and M.G.L. Ch. 40A.

At 92 Main Street (Map 12, Lot 46), applicant EDM Construction is seeking a Petition for Relief-Special Permit under Section 300-9 of the Salisbury Zoning Bylaws, regarding a change to "Use Regulations" under Salisbury Zoning Bylaw Section 300-9.

Susan Pawlisheck
Chairman

NT - 7/10, 7/17/18

MERRIMAC CONSERVATION COMMISSION

In accordance with Massachusetts General Laws, Chapter 131 Section 40, the Wetlands Protection Act, notice is hereby given that the Merrimac Conservation Commission will hold a public hearing on **Tuesday, July 24, 2018, 7:30pm**, at the Merrimac Public Library. Said hearing is relative to a Notice of Intent filed by **John Theriault** to construct a garage and associated work. The work will be done at 1 Alnette Rd. within the buffer zone of Lake Attitash.

Jay B. Smith
Conservation Agent
Merrimac, Mass.

NT - 7/17/18

TOWN OF NEWBURY PLANNING BOARD PUBLIC HEARING NOTICE

Residents of the Town of Newbury and other interested persons please note that on **Wednesday, August 1, 2018, at 7:45 p.m.**, the Newbury Planning Board will hold a public hearing in the second floor **Hearing Room at the Newbury Municipal Offices, 12 Kent Way, Byfield, MA 01922** to consider the application of Jennifer Ford, Seacoast Canine, for approval of a **Special Permit** to operate a dog daycare, including dog training and dog play space, at 35 Downfall Road, Byfield, MA, Assessors Map R41, Lot 60, in the Residential-Agricultural District. Copies of the Application are on file with the Town Clerk and the Planning Office, 12 Kent Way, Suite 101, Byfield, MA, and are available for review during regular working hours. For more information contact the Planning Office at 978-465-0862, ext. 312. All persons interested in or wishing to be heard on the proposed Special Permit application should appear at the time and place designated above.

John Weis, Chair
Newbury Planning Board
NT - 7/17, 7/24/18

PETS & FREE PETS

GORGEOUS PARTI-YORKIE PUPS Family raised, well socialized. 1st shots / dewormed. North Shore area. Ready June 23rd. Deposit \$250 to hold. (781) 691-1193

ICCF REG. CANE CORSO PUPPIES 5 Beautiful females available. Family protection, show quality out of champion lines! Must see you will not be disappointed. \$2,000 call (978) 943-9833 Facebook- Milton Colon they will not last.

MALSHI Beautiful male and female Malshi (Shih Tzu and Maltese mix). Healthy, well socialized, home raised with other pets and children. Loving and friendly nature. \$500-\$650. Sharon 978-335-1823 call or text or email: sharonscuties@gmail.com

Mini-Goldendoodle, Havanoo, Bichpoo, Morkie Cavalier-cockapoos, Wheatens, Goldendoodle Golden, Shorkies etc. \$995 + 603-942-9970

Non-Pure Breed Birman Kitten Wanted

Prefer a male kitten that is 8 weeks old or slightly older. Call Ed 603-642-4690

Non-Pure Breed Kitten Wanted

Prefer a male kitten that is: A) 8 weeks old or slightly older; B) colourpointed nose; C) semi-longhaired coat (i.e., Birman, Balinese (Javanese), Ragdoll. Do not desire a kitten that has A) short nose; B) no tail; C) coat that is all black. Call Ed 603-642-4690

RAG DOLL KITTENS - TICA Registered. Ready NOW. \$795. Call (978) 655-1941

SHIH TZU female puppy born 2/12/18. White with brown patches. House trained. Up to date with shots. Very good dog. Name Daisy. \$1200. Call (603) 432-6720 leave message

WARNING

If you get an email or cashiers check for more than the asking price for your pet, vehicle or merchandise asking you to refund the difference it is likely a scam. Seller Beware!

PUBLIC NOTICES

Janet McSweeney LICSW announces the closure of office in Amesbury.
mcsweeneyjanetm@gmail.com, P.O. BOX 251 GLOUCESTER MA 01931
NT - 7/13, 7/17, 7/19/2018

PUBLIC HEARING NOTICE SALISBURY PLANNING BOARD

Pursuant to General Laws Chapter 40A and §300-35 of the Town of Salisbury Zoning Bylaws, the Salisbury Planning Board will hold a Public Hearing at the Salisbury Town Hall, 5 Beach Road, Salisbury on **Wednesday, July 25, 2018 at 7:10 PM** on the following:

A special permit filing by Arakelian Family, LLC, for property located on 195 & 201 Elm Street Salisbury, MA. Request seeks a determination on whether the use of self-storage facilities is similar in character to permitted uses in the Office Park (C-3) District.

Copies of the plans are available to be viewed at the Salisbury Planning Department, Salisbury Town Hall, 5 Beach Road, Salisbury, MA during the regular business hours of the Salisbury Town Hall.

Any person interested or wishing to be heard on the proposed project should appear at the time and place designated.

Respectfully,
Trudi Holder, Chair
Salisbury Planning Board
NT – 7/10, 7/17/18

TOWN OF NEWBURY PLANNING BOARD PUBLIC HEARING NOTICE

Residents of the Town of Newbury and other interested persons please note that on **Wednesday, August 1, 2018, at 7:15 p.m.** in the **Second Floor Hearing Room at the Newbury Municipal Offices, 12 Kent Way, Byfield, MA 01922**, the Newbury Planning Board will hold a **public hearing** to consider a **Site Plan Review Application for Olga Way Drainage Improvements and Gravel Staging and Access Area**; Applicant: Town of Newbury, Town Administrator. The Town requests approval of a proposed plan to re-construct a portion of Olga Way and install a sand swale within the Olga Way Right-of-Way and to construct a gravel staging and access area within an existing area of gravel and fill. Work is to be performed on **Olga Way and four Town-owned parcels at 27 10th Street, 20 6th Street, 9 McLeod Avenue, and 12 Olga Way, Assessors Map U02, Parcels 139, 142, 143, and 171**, as shown on the drawings entitled "Municipal Drainage & Staging & Access Area Design, Map U-02, Parcels 139, 142, 143 & 171, Olga Way, Newbury MA. 01951, Essex County," Sheets 1 through 7 of 7, dated July 20, 2017, revised October 4, 2017, and June 18, 2018, and described in supporting documents, prepared by Arc Surveying and Engineering Associates, Inc. The Application is on file for review during regular business hours with the Town Clerk and in the Planning Office, 12 Kent Way, Byfield, MA. For more information contact the Planning Office at 978-465-0862, ext. 312. All persons interested or wishing to be heard relative to the proposed project should appear at the time and place designated above.

John Weis, Chair
Newbury Planning Board
NT - 7/17, 7/24/18

PETS & FREE PETS

TOTO - AKC WHEATEN CAIRN TERRIERS - 2 males. First shots. Wormed. Health certificate. Call 603-918-1098 or 603-474-2317

SEASONAL ITEMS

Heat Wave is Coming!!

2 - Frigidaire 10,000 BTU Air Conditioners
1 yrs. Old used 3 times
\$250 each or best offer
CALL (978) 374-5916

SPORTING GOODS

OLD TOWN PENOBSCOT 17 CANOE Royale hull (blue), 1100lb capacity, 2 wood + 2 aluminum paddles - very good condition - \$600 - Call 978-494-2635

Transportation

ANTIQUE/CLASSICS

JAGUAR CONVERTIBLE 1989 XJS ESTATE SALE
Approx 75,000 miles, need minor work. Shown by appointment only. Asking \$9500. Call (978) 869-9943

SUNBEAM, Alpine 1966. 2.8 V6 Chevy 4 Spd. Auto New Top Hard Top great summer car Needs paint Registered and Inspected. Call for more details. Asking \$11,000.00. 978-778-8379

1979 Antique Chevy Nova

South origin 2 door ac, 91k, corvette wheels, new parts, good running cond, registered & inspected. For info call 978-465-3913 \$3995 taking offers, will talk

AUTOS

ACURA, TSX 2005, 128K miles. California car, one owner, all factory service and receipts. Needs nothing and very clean. Light blue. 2 sets summer and winter tires & floor mats. Must see and drive to believe. Feels like a new car. \$6900 508-560-8481 ask for Billy

AUDI A5 2012 AUD 2 door convertible clean carfax, well maintained! Like new! Premium Plus Edition, loaded with 8 speed automatic, leather, all power, premium sound and more. This black beauty is ready to enjoy \$16,900. CALL TODAY at 978-462-3088

BMW, 535xi 2008. 120,090 miles. Exterior Color: Space Gray Interior color: Cream Beige Transmission: 6 speed Automatic Engine: 3.0L I6 DOHC 24V TURBO All-wheel drive, 17-inch alloy wheels, Xenon headlights, Headlight washers, Navigation, Dual-zone climate control, Panoramic moonroof, Heated sport leather seats, Power adjustable steering column, Power tailgate, Auto-dimming mirrors.. \$7495.00. Call 978 852-1424

First Run

BMW 650i 2008 2 door convertible 4.8i automatic transmission, leather interior, all power including seats, ice cold AC, navigation, premium sound and much more. Priced at only \$18900. Call today 978-462-3088 or text us anytime at 978-992-2313

FULLY LOADED

BUICK LACROSSE 2013

Leather package. Fully loaded. Bluetooth backup camera, heated seat, navigational system, etc. Color black. ONLY 40,000 miles. \$12,900. Call 978-239-7026

PUBLIC NOTICES

MORTGAGEE'S NOTICE OF SALE OF REAL ESTATE

By virtue and in execution of the Power of Sale contained in a certain Mortgage given by Erik C. Nock and Alyssa M. Nock to Washington Mutual Bank, FA, a federal association, dated July 21, 2005 and recorded with the Essex County (Southern District) Registry of Deeds at Book 24598, Page 329 as affected by a Loan Modification recorded on October 13, 2011 in Said Registry of Deeds at Book 30734, Page 516 as affected by a Loan Modification recorded on May 8, 2012 in Said Registry of Deeds at Book 31326, Page 137, subsequently assigned to JPMorgan Chase Bank, National Association by The Federal Deposit Insurance Corporation, a Corporation organized and existing under an act of congress (FDIC), and acting in its receivership capacity as receiver of Washington Mutual Bank F/K/A Washington Mutual Bank, FA by assignment recorded in said Essex County (Southern District) Registry of Deeds at Book 33916, Page 310, subsequently assigned to Wells Fargo Bank, N.A. as trustee for Freddie Mac Securities REMIC Trust, Series 2005-S001 by JPMorgan Chase Bank, National Association by assignment recorded in said Essex County (Southern District) Registry of Deeds at Book 33916, Page 311 for breach of the conditions of said Mortgage and for the purpose of foreclosing same will be sold at Public Auction at 3:00 PM on August 7, 2018 at 43 Mudnock Road, Salisbury, MA, all and singular the premises described in said Mortgage, to wit:

The land with the buildings thereon, located on Mudnock Road in Salisbury, Essex County, Massachusetts shown as Lot 2 on a plan of land entitled "Plan of Land in Salisbury, Massachusetts, Owners Walter T. & Eleanor B. Morse," dated July 12, 1977 and recorded in Essex South District Registry of Deeds in Plan Book 144, Plan 57.

The premises are to be sold subject to and with the benefit of all easements, restrictions, encroachments, building and zoning laws, liens, unpaid taxes, tax titles, water bills, municipal liens and assessments, rights of tenants and parties in possession, and attorney's fees and costs.

TERMS OF SALE:

A deposit of FIVE THOUSAND DOLLARS AND 00 CENTS (\$5,000.00) in the form of a certified check, bank treasurer's check or money order will be required to be delivered at or before the time the bid is offered. The successful bidder will be required to execute a Foreclosure Sale Agreement immediately after the close of the bidding. The balance of the purchase price shall be paid within thirty (30) days from the sale date in the form of a certified check, bank treasurer's check or other check satisfactory to Mortgagee's attorney. The Mortgagee reserves the right to bid at the sale, to reject any and all bids, to continue the sale and to amend the terms of the sale by written or oral announcement made before or during the foreclosure sale. If the sale is set aside for any reason, the Purchaser at the sale shall be entitled only to a return of the deposit paid. The purchaser shall have no further recourse against the Mortgagor, the Mortgagee or the Mortgagee's attorney. The description of the premises contained in said mortgage shall control in the event of an error in this publication. **TIME WILL BE OF THE ESSENCE.**

Other terms, if any, to be announced at the sale.

Wells Fargo Bank, N.A. as trustee for Freddie Mac Securities REMIC Trust, Series 2005-S001
Present Holder of said Mortgage,
By Its Attorneys,
ORLANDS PC
PO Box 540540
Waltham, MA 02454
Phone: (781) 790-7800
17-008786

NT – 7/17, 7/24, 7/31/18

PUBLIC NOTICES ARE IMPORTANT

Public notices allow citizens to monitor their government and make sure that it is working in their best interest.

Your newspaper offers an independent and archived record of public notices, and fosters a more trusting relationship between government and its citizens.



July 13, 2018

Lisa Pearson – Planning Director
Town of Salisbury
5 Beach Road
Salisbury, MA 01952

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for July 25, 2018 at 6:00pm at 107 Elm St, Salisbury, MA 01952. The proposed adult-use retail facility is anticipated to be located at 107 Elm Street, Salisbury, MA 01952. There will be an opportunity for the public to ask questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Edwards", written in a cursive style.

Christopher Edwards
Chief Executive Officer



July 13, 2018

Melinda Morrison – Town Clerk
Town of Salisbury
5 Beach Road
Salisbury, MA 01952

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for July 25, 2018 at 6:00pm at 107 Elm St, Salisbury, MA 01952. The proposed adult-use retail facility is anticipated to be located at 107 Elm Street, Salisbury, MA 01952. There will be an opportunity for the public to ask questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chris Edwards', is written over a faint, light-colored circular watermark or seal.

Christopher Edwards
Chief Executive Officer



July 13, 2018

[REDACTED]
[REDACTED]

Salisbury, MA 01952

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for July 25, 2018 at 6:00pm at 107 Elm St, Salisbury, MA 01952. The proposed adult-use retail facility is anticipated to be located at 107 Elm Street, Salisbury, MA 01952. There will be an opportunity for the public to ask questions.

Sincerely,



Christopher Edwards
Chief Executive Officer

Community Outreach Meeting Attestation Form

The applicant must complete each section of this form and initial each page before uploading it to the application. Failure to complete a section will result in the application being deemed incomplete. Instructions to the applicant appear in italics. Please note that submission of information that is “misleading, incorrect, false, or fraudulent” is grounds for denial of an application for a license pursuant to 935 CMR 500.400(1).

I, Christopher Edwards, (*insert name*) attest as an authorized representative of Alternative Therapies Group, Inc. (*insert name of applicant*) that the applicant has complied with the requirements of 935 CMR 500 and the guidance for licensed applicants on community outreach, as detailed below.

1. The Community Outreach Meeting was held on July 25, 2018 (*insert date*).
2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on July 17, 2018 (*insert date*), which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A (*please clearly label the newspaper notice in the upper right hand corner as Attachment A and upload it as part of this document*).
3. A copy of the meeting notice was also filed on July 13, 2018 (*insert date*) with the city or town clerk, the planning board, the contracting authority for the municipality, and local licensing authority for the adult use of marijuana, if applicable. A copy of the municipal notice is attached as Attachment B (*please clearly label the municipal notice in the upper right-hand corner as Attachment B and upload it as part of this document*).
4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on July 13, 2018 (*insert date*), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (*please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee*).

5. Information was presented at the community outreach meeting including:
 - a. The type(s) of Marijuana Establishment to be located at the proposed address;
 - b. Information adequate to demonstrate that the location will be maintained securely;
 - c. Steps to be taken by the Marijuana Establishment to prevent diversion to minors;
 - d. A plan by the Marijuana Establishment to positively impact the community; and
 - e. Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.
6. Community members were permitted to ask questions and receive answers from representatives of the Marijuana Establishment.

Host Community Agreement Certification Form

The applicant and contracting authority for the host community must complete each section of this form before uploading it to the application. Failure to complete a section will result in the application being deemed incomplete. Instructions to the applicant and/or municipality appear in italics. Please note that submission of information that is “misleading, incorrect, false, or fraudulent” is grounds for denial of an application for a license pursuant to 935 CMR 500.400(1).

Applicant

I, Christopher Edwards, (*insert name*) certify as an authorized representative of Alternative Therapies Group, Inc. (*insert name of applicant*) that the applicant has executed a host community agreement with Salisbury, MA (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on 08/13/2018 (*insert date*).



Signature of Authorized Representative of Applicant

Host Community

I, Neil Harrington, (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for Salisbury, MA (*insert name of host community*) to certify that the applicant and Salisbury, MA (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on 08/13/2018 (*insert date*).



Signature of Contracting Authority or
Authorized Representative of Host Community

Plan to positively impact the community

ATG's plan to positively impact its host communities includes:

- We currently employ approximately 45 individuals between our Amesbury cultivation and product manufacturing facility and our Salem dispensary facility combined. We expect to add 30-35 more professional jobs over the next 6 months.
- ATG is occupying facilities that were previously vacant, and available on the rental market for long periods of time. Our presence has increased the tax base in both communities.
- ATG's presence has improved the security profile for both neighborhoods in which it operates. This has been accomplished through security systems as well as awareness and procedures.
- ATG is providing a safe, regulated option for consumers of marijuana products. Every product that we sell is tested by a third party lab for potency as well as contaminants. The test results are available to be verified by the consumers.
- ATG has entered into Host Community Agreements with each host community. We have agreed to offer the highest financial impact fee allowed by statute. We have also agreed to select staff and vendors from the local community whenever possible.
- ATG will be collecting and paying taxes per state law, a portion of which will flow directly back to each host community.
- ATG has made substantial charitable donations to more than a dozen local non-profit organizations.
- Lastly, ATG regularly conducts food drives to benefit local food pantries.

ATG's plan to positively impact areas of disproportionate impact:

- We plan to conduct career fairs in Haverhill and Lynn, which are the nearest communities defined by the CNB as disproportionately impacted. At these events, our staff will meet with prospective applicants, answer questions about open positions, and schedule formal interviews with qualified candidates for positions with the company.
- We also plan to offer job skills assessments and guidance for interested parties to receive training relevant to open positions with the company.

Plan to positively impact the community

ATG's plan to positively impact its host communities includes:

- We currently employ approximately 45 individuals between our Amesbury cultivation and product manufacturing facility and our Salem dispensary facility combined. We expect to add 30-35 more professional jobs over the next 6 months.
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- ATG is providing a safe, regulated option for consumers of marijuana products. Every product that we sell is tested by a third party lab for potency as well as contaminants. The test results are available to be verified by the consumers.
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- ATG will be collecting and paying taxes per state law, a portion of which will flow directly back to each host community.
- ATG has made substantial charitable donations to more than a dozen local non-profit organizations.
- Lastly, ATG regularly conducts food drives to benefit local food pantries.

ATG's plan to positively impact areas of disproportionate impact:

1. Goals:
 - a. Reducing barriers to entry in the commercial adult-use cannabis industry
 - b. Conducting and/or participating in career fairs in disproportionately impacted communities at least twice per year
 - c. Providing skills assessment and job opportunities for qualified individuals from disproportionately impacted communities
 - d. Providing on-the-job training for qualified individuals from disproportionately impacted communities
 - e. Providing opportunities for advancement to qualified employees from disproportionately impacted communities
2. Programs:
 - a. We plan to conduct career fairs in Haverhill and Lynn, which are the nearest communities defined by the CNB as disproportionately impacted. At these events, our staff will meet with prospective applicants, answer questions about open positions, and schedule formal interviews with qualified candidates for positions with the company.
 - b. We also plan to offer job skills assessments and guidance for interested parties to receive training relevant to open positions with the company.
3. Measurement and Accountability:
 - a. We expect that at least 5% of our staff will be comprised of individuals from disproportionately impacted communities and people of color
 - b. We expect that at least 25% of our staff from disproportionately impacted communities and people of color will qualify for advancement opportunities within the organization

Examiner

Name
Approved

The Commonwealth of Massachusetts

William Francis Galvin
Secretary of the Commonwealth
One Ashburton Place, Boston, Massachusetts 02108-1512

ARTICLES OF ORGANIZATION (General Laws, Chapter 180)

ARTICLE I

The exact name of the corporation is:

ALTERNATIVE THERAPIES GROUP, INC.

ARTICLE II

The purpose of the corporation is to engage in the following activities:

(A) TO PROVIDE AN ARRAY OF HIGH QUALITY AND SAFE HOLISTIC MEDICINE OPTIONS TO THE PUBLIC; AND

(B) ALL SUCH OTHER PURPOSES AS ARE PERMISSIBLE FOR A CORPORATION FORMED UNDER CHAPTER 180 OF THE MASSACHUSETTS GENERAL LAWS.

THE CORPORATION IS ORGANIZED EXCLUSIVELY FOR SCIENTIFIC AND EDUCATIONAL PURPOSES WITHIN THE MEANING OF SECTION 501 (C) (3) OF THE INTERNAL REVENUE CODE, AS AMENDED.

C ☐

P ☐

M ☐

R.A. ☐

P.C.

Note: If the space provided under any article or item on this form is insufficient, additions shall be set forth on one side only of separate 8 1/2 x 11 sheets of paper with a left margin of at least 1 inch. Additions to more than one article may be made on a single sheet so long as each article requiring each addition is clearly indicated.

ARTICLE III

A corporation may have one or more classes of members. If it does, the designation of such classes, the manner of election or appointments, the duration of membership and the qualification and rights, including voting rights, of the members of each class, may be set forth in the by-laws of the corporation or may be set forth below:

NOT APPLICABLE.

ARTICLE IV

****Other lawful provisions, if any, for the conduct and regulation of the business and affairs of the corporation, for its voluntary dissolution, or for limiting, defining, or regulating the powers of the corporation, or of its directors or members, or of any class of members, are as follows:**

SEE ATTACHMENT SHEET

ARTICLE V

The by-laws of the corporation have been duly adopted and the initial directors, president, treasurer and clerk or other presiding, financial or recording officers, whose names are set out on the following page, have been duly elected.

****If there are no provisions, state "None".**

Note: The preceding four (4) articles are considered to be permanent and may only be changed by filing appropriate Articles of Amendment.

ATTACHMENT SHEET
TO ARTICLES OF ORGANIZATION (ARTICLE IV)
ALTERNATIVE THERAPIES GROUP, INC.

(a) No officer or Director shall be personally liable to the Corporation for monetary damages for any breach of fiduciary duty as an officer or Director notwithstanding any provision of law imposing such liability, except (to the extent provided by applicable law) for liability (i) for breach of the officer's or Director's duty of loyalty to the Corporation, (ii) for acts or omissions not in good faith or which involve intentional misconduct or a knowing violation of law or (iii) for any transaction from which the officer or Director derived an improper personal benefit.

(b) The Corporation shall make no contribution for other than religious, charitable, scientific, literary or educational purposes.

(c) The Corporation may be a partner to the maximum extent permitted by law in any enterprise which it would have power to conduct by itself.

(d) The Directors may make, amend or repeal the By-Laws in whole or in part.

(e) The Corporation may solicit and receive contributions from any and all sources and may receive and hold, in trust or otherwise, funds received by gift or bequest.

(f) The Corporation may make contracts of guarantee and suretyship, whether or not in furtherance of its purposes; provided, however, that (a) such contracts are necessary or convenient to the conduct, promotion or attainment of the business of a corporation all of the outstanding stock of which is owned, directly or indirectly by the Corporation; and (b) the Board of Directors of the Corporation has determined that such contracts are necessary or convenient to the conduct, promotion or attainment of the business of the Corporation.

(g) No part of the net earnings or the assets of the Corporation shall inure to the benefit of any officer or Director of the Corporation or any private individual, except that the Corporation may pay reasonable compensation for services rendered and make payments and distributions in furtherance of its exempt purposes.

(h) No substantial part of the activities of the Corporation shall be the carrying on of propaganda, or otherwise attempting to influence legislation, except to the extent permitted by Section 501(h) of the Internal Revenue Code, and the Corporation shall not participate in or intervene in (including the publishing or distribution of statements) any political campaign on behalf of (or in opposition to) any candidate for public office. Notwithstanding any other provisions of these Articles of Organization, the Corporation shall not carry on any other activities not permitted to be carried on (a) by a corporation exempt from federal income tax under Section 501(c)(3) of the Internal Revenue Code, or (b) by a corporation, contributions to which are deductible under Section 170(c)(2) of the Internal Revenue Code.

(i) In the event of the dissolution of the Corporation, the Board of Directors, after paying or making provision for the payment of all liabilities of the Corporation, shall distribute, in any

proportion considered prudent, all the assets of the Corporation to such organization or organizations organized and operated exclusively for charitable, educational or scientific purposes and at the time qualifying as an exempt organization or organizations under Section 501(c)(3) of the Internal Revenue Code, as the Board of Directors shall determine. Any such assets not so disposed of shall be disposed of by a court of competent jurisdiction of the county in which the principal office of the Corporation is then located, exclusively for such purposes or to such organization or organizations, as said court shall determine, which are organized and operated exclusively for such purposes.

(j) The Corporation must act, or refrain from acting, in any manner as is specified in Chapter 68A of the Massachusetts General Laws.

(k) The Directors shall have the power to fix their compensation from time to time. No contract or transaction between the Corporation and one or more of its Directors or officers, or between the Corporation and any other corporation, partnership, association, or other organization in which one or more of its Directors or officers are directors or officers, or have a financial or other interest, shall be void or voidable solely for this reason, or solely because the Director or officer is present at or participates in the meeting of the Board of Directors or committee thereof which authorizes the contract or transaction, or solely because his or their votes are counted for such purpose, nor shall any Director or officer be under any liability to the Corporation on account of any such contract or transaction if:

(1) the material facts as to his relationship or interest and as to the contract or transaction are disclosed or are known to the Board of Directors or the committee, and the Board or committee authorized the contract or transaction by the affirmative votes of a majority of the disinterested Directors, even though the disinterested Directors be less than a quorum; or

(2) the contract or transaction is fair as to the Corporation as of the time it is authorized, approved or ratified, by the Board of Directors, or a committee thereof.

Common or interested directors may be counted in determining the presence of a quorum at a meeting of the Board of Directors or of a committee which authorizes the contract or transaction.

(l) The Corporation shall, to the extent legally permissible, indemnify any person serving or who has served as a Director or officer of the Corporation, or at its request as a Director or officer of any organization, or at its request in any capacity with respect to any employee benefit plan, and may indemnify an employee or other agent who has so served, against all liabilities and expenses, including amounts paid in satisfaction of judgments, in compromise or as fines and penalties, and counsel fees, reasonably incurred by him in connection with the defense or disposition of any action, suit or other proceeding, whether civil or criminal, in which he may be involved or with which he may be threatened, while in office or thereafter, by reason of his being or having been such a Director or officer (or in any capacity with respect to any employee benefit plan), except with respect to any matter as to which he shall have been adjudicated in any proceeding not to have acted in good faith in the reasonable belief that his action was in the best interests of the Corporation (or, to the extent that such matter relates to service with respect to an employee benefit plan), in the best interest of the participants or beneficiaries of such employee benefit plan;

provided, however, that as to any matter disposed of by a compromise payment by such person, pursuant to a consent decree or otherwise, no indemnification either for said payment or for any other expenses shall be provided unless such compromise and indemnification therefor shall be approved:

(i) by a majority vote of a quorum consisting of disinterested Directors;

(ii) if such a quorum cannot be obtained, then by a majority vote of a committee of the Board of Directors consisting of all the disinterested Directors;

(iii) if there are not two or more disinterested Directors in office, then by a majority of the Directors then in office, provided they have obtained a written finding by special independent legal counsel appointed by a majority of the Directors to the effect that, based upon a reasonable investigation of the relevant facts as described in such opinion, the person to be indemnified appears to have acted in good faith in the reasonable belief that his action was in the best interests of the Corporation (or, to the extent that such matter relates to service with respect to an employee benefit plan, in the best interests of the participants or beneficiaries of such employee benefit plan); or

(iv) by a court of competent jurisdiction.

If authorized in the manner specified above for compromise payments, expenses including counsel fees, reasonably incurred by any such person in connection with the defense or disposition of any such action, suit or other proceeding may be paid from time to time by the Corporation in advance of the final disposition thereof upon receipt of (a) an affidavit of such individual of his good faith belief that he has met the standard of conduct necessary for indemnification under this Article, and (b) an undertaking by such individual to repay the amounts so paid to the Corporation if it is ultimately determined that indemnification for such expenses is not authorized by law or under this Article, which undertaking may be accepted without reference to the financial ability of such person to make repayment.

The right of indemnification hereby provided shall not be exclusive of or affect any other rights to which any such indemnified person may be entitled. Nothing contained herein shall affect any rights to indemnification to which corporate personnel other than the persons designated in this Article may be entitled by contract, by vote of the Board of Directors, or otherwise under law.

As used herein the terms "person," "Director," "officer," employee, " and "agent" include their respective heirs, executors and administrators, and an "interested" Director or officer is one against whom in such capacity the proceedings in question or other proceedings on the same or similar grounds is then pending.

If any term or provision hereof, or the application thereof to any person or circumstances, shall to any extent be held invalid or unenforceable, the remainder hereof, or the application of such term or provision to persons or circumstances other than those as to which it is held invalid or unenforceable, shall not be affected thereby, and each term and provision hereof shall be held valid and be enforced to the fullest extent permitted by law.

(m) All references herein to (i) the Internal Revenue Code shall be deemed to refer to the Internal Revenue Code of 1986, as now in force or hereafter amended, (ii) any chapter of the Massachusetts General Laws shall be deemed to refer to said chapter as now in force or hereafter amended, and (iii) particular sections of the Internal Revenue Code or Massachusetts General Laws shall be deemed to refer to similar or successor provisions hereafter adopted.

ARTICLE VI

The effective date of organization of the corporation shall be the date approved and filed by the Secretary of the Commonwealth. If a *later* effective date is desired, specify such date which shall not be more than *thirty days* after the date of filing.

ARTICLE VII

The information contained in Article VII is not a permanent part of the Articles of Organization.

a. The street address (post office boxes are not acceptable) of the principal office of the corporation *in Massachusetts* is:

44 MERRIMAC STREET, NEWBURYPORT, MA 01950

b. The name, residential address and post office address of each director and officer of the corporation is as follows:

	NAME	RESIDENTIAL ADDRESS	POST OFFICE ADDRESS
President:	CHRISTOPHER EDWARDS	44 MERRIMAC STREET	NEWBURYPORT, MA 01950
Treasurer:	CHRISTOPHER EDWARDS	44 MERRIMAC STREET	NEWBURYPORT, MA 01950
Clerk:	CHRISTOPHER EDWARDS	44 MERRIMAC STREET	NEWBURYPORT, MA 01950
Directors:	CHRISTOPHER EDWARDS	44 MERRIMAC STREET	NEWBURYPORT, MA 01950
(or officers			
having the	TERESA PASTORE	28 KENT STREET	NEWBURYPORT, MA 01950
powers of			
directors)	KEVIN LOMBARDI	6 MARTINACK AVENUE	PEABODY, MA 01960

c. The fiscal year of the corporation shall end on the last day of the month of: DECEMBER

d. The name and business address of the resident agent, if any, of the corporation is:

NONE.

I/We, the below signed incorporator(s), do hereby certify under the pains and penalties of perjury that I/we have not been convicted of any crimes relating to alcohol or gaming within the past ten years. I/We do hereby further certify that to the best of my/our knowledge the above-named officers have not been similarly convicted. If so convicted, explain.

IN WITNESS WHEREOF AND UNDER THE PAINS AND PENALTIES OF PERJURY, I/we, whose signature(s) appear below as incorporator(s) and whose name(s) and business or residential address(es) *are clearly typed or printed* beneath each signature, do hereby associate with the intention of forming this corporation under the provisions of General Laws, Chapter 180 and do hereby sign these Articles of Organization as incorporator(s) this _____ day of _____ OCTOBER _____, 20 12 _____,

CHRISTOPHER EDWARDS

Note: If an existing corporation is acting as incorporator, type in the exact name of the corporation, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said corporation and the title he/she holds or other authority by which such action is taken.

THE COMMONWEALTH OF MASSACHUSETTS

ARTICLES OF ORGANIZATION

(General Laws, Chapter 180)

I hereby certify that, upon examination of these Articles of Organization, duly submitted to me, it appears that the provisions of the General Laws relative to the organization of corporations have been complied with, and I hereby approve said articles; and the filing fee in the amount of \$ _____ having been paid, said articles are deemed to have been filed with me this _____ day of _____ 20 ____.

Effective date: _____

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

TO BE FILLED IN BY CORPORATION

Contact information:

WILLIAM O'FLAHERTY

102E STATE STREET

NEWBURYPORT, MA 01950

Telephone: 978-462-4416

Email: bill@oflahertylaw.com

A copy this filing will be available on-line at www.state.ma.us/sec/cor once the document is filed.

AMENDED AND RESTATED BYLAWS
of
ALTERNATIVE THERAPIES GROUP, INC.
a Massachusetts corporation

ARTICLE I

NAME, PURPOSES, LOCATION, CORPORATE SEAL, AND FISCAL YEAR

1.1 Name and Purposes. The name and purposes of the corporation shall be as set forth in the Articles of Organization. In compliance with 105 CMR 725.100(A)(i), the corporation shall at all times operate on a non-profit basis for the benefit of registered qualifying patients, and shall ensure that the revenue of the corporation is used solely in furtherance of its nonprofit purpose.

1.2 Location. The principal office of the corporation in the Commonwealth of Massachusetts shall initially be located at the place set forth in the Articles of Organization of the corporation. The Directors may change the location of the principal office in the Commonwealth of Massachusetts effective upon filing a certificate or annual report with the Secretary of the Commonwealth.

1.3 Corporate Seal. The Directors may adopt and alter the seal of the corporation. The seal of the corporation, if any, shall, subject to alteration by the Directors, bear its name, the word "Massachusetts" and the year of its incorporation.

1.4 Fiscal Year. The fiscal year of the corporation shall, unless otherwise decided by the Directors, end on December 31 in each year.

ARTICLE II

MEMBERS

2.1 Election and Qualification. Membership of the corporation shall be determined as follows.

(a) Members. The initial members shall be Christopher Edwards and Julio Fuentes. Thereafter, members shall be elected by the unanimous vote of the members of the corporation at a meeting of such members.

(b) Intentionally omitted.

2.2 Tenure. Each member shall hold office indefinitely until such member dies, ceases to exist, resigns, is removed, or becomes disqualified.

2.3 Powers and Rights. Members shall have the right to elect Directors as provided in these Bylaws and such other powers and rights as are vested in them by law, the Articles of Organization, or these Bylaws. Members shall also have such other powers and rights as the Directors may designate.

2.4 Removal. A member may be removed with or without cause by an unanimous vote of the members then in office. A member may be removed for cause only after reasonable notice and opportunity to be heard.

2.5 Resignation. A member may resign by delivering his, her or its written resignation to the president, treasurer, or clerk of the corporation, to a meeting of the members or Directors, or to the corporation at its principal office. Such resignation shall be effective upon receipt (unless specified to be effective at some other time), and acceptance thereof shall not be necessary to make it effective unless it so states.

2.6 Vacancies. Any vacancy in the membership may be filled by the members in accordance with Section 2.1. Except as otherwise provided by law, the Articles of Organization, or these Bylaws, the members shall have and may exercise all their powers notwithstanding the existence of one or more vacancies in their number.

2.7 Annual Meetings. The date, place and time of the annual meeting of the members shall be fixed by the Directors. Each annual meeting shall be held for the purpose of electing Directors and for such other purposes as may properly be brought before the meeting under law, the Articles of Organization, or these Bylaws.

If an annual meeting is not held as herein provided, a special meeting of the members may be held in place thereof with the same force and effect as the annual meeting, and in such case all references in these Bylaws to the annual meeting of the members, except in this Section 2.7, shall be deemed to refer to such special meeting.

If, after having been designated by the Directors and after notice thereof shall have been given to the members, the time, date, or place of any meeting for the election of Directors shall be changed, written notice of the change shall, in the manner provided in Section 2.10, be given to each member entitled to vote at the meeting.

2.8 Regular Meetings. Regular meetings of the members may be held at such places within the United States and at such times as the members may determine.

2.9 Special Meetings. Special meetings of the members may be held at any time and at any place within the United States. Special meetings of the members

may be called by the president or by the Directors. Except as otherwise provided by law, upon written application of one of the two members, special meetings shall be called by the clerk, or, in the case of the death, absence, incapacity, or refusal of the clerk, by any other officer. The members requesting the special meeting, and the notice of such special meeting, shall each specify the purpose thereof.

2.10 Notice of Meetings. Except as otherwise provided by law, a written notice of every meeting of members, stating the place, date, and hour thereof, shall be given by the clerk, by an assistant clerk, or by the person calling the meeting, at least seven (7) days before the meeting to each member, who by law, by the Articles of Organization, or by these Bylaws, is entitled to such notice, by telephone, telecopy or electronic mail or other equivalent electronic media, or by leaving such notice with such member or at such member's residence or last known usual place of business, or by mailing it postage prepaid and addressed to such member at such member's last known address as it appears upon the records of the corporation. Any notice given hereunder shall state the place, date, and hour of the meeting, but need not specify the purposes of the meeting except that if an amendment to the corporation's Articles of Organization or these Bylaws shall be a purpose of the meeting, or if the meeting is the first annual meeting next following the making, amending or repealing by the Board of Directors of any Bylaw, the same shall be so stated in the notice. Except as provided by law, no notice need be given to any member if a written waiver of notice, executed before or after the meeting by the member or his, her, or its attorney thereunto duly authorized, is filed with the records of the meeting. No notice of any adjourned meeting shall be required if (a) the time and place thereof are announced at the meeting at which the adjournment is taken, (b) the adjournment is for less than thirty (30) days, and (c) no new record date is fixed for the adjourned meeting.

2.11 Quorum. Except as otherwise provided by law, by the Articles of Organization, or by these Bylaws, at any meeting of the members, all of the members then in office (whether present in person or duly represented) shall constitute a quorum. A quorum shall not be required to adjourn any meeting to such date or dates not more than thirty (30) days after the first session of the meeting, and at any adjourned meeting any business may be transacted which might have been transacted at the meeting as originally called, provided a quorum shall be in attendance at such adjourned meeting.

2.12 Action by Vote. Each member shall have one (1) vote. When a quorum is present at any meeting, an unanimous vote of the members present in person or duly represented shall decide any question, including election to any office, unless otherwise provided by law, the Articles of Organization, or these Bylaws. No ballot shall be required for such election or other matter unless requested by a member present or duly represented at the meeting and entitled to vote with respect to such election or matter.

2.13 Action Without Meeting. Any action required or permitted to be taken at any meeting of the members may be taken without a meeting if all members entitled to vote on the matter consent to the action in writing and the written consents are filed with the records of the meetings of the members. Such consents shall be treated for all purposes as a vote at a meeting.

2.14 Proxies. Members may vote either in person or by written proxy dated not more than six (6) months before the meeting named therein, which proxies, before being voted, shall be filed with the clerk or other person responsible for recording the proceedings of the meeting. Unless otherwise specifically limited by their terms, such proxies shall entitle the holder thereof to vote at any adjournment of the meeting but the proxy shall terminate after the final adjournment of such meeting. A proxy purporting to have been executed by or on behalf of a member shall be deemed valid unless challenged at or prior to its exercise and the burden of providing any alleged invalidity shall rest with the person challenging the proxy.

2.15 Compensation. Unless otherwise provided by law, the Articles of Organization, or these Bylaws, members shall be entitled to receive for their services, such reasonable amounts, if any, as the Directors may determine, which may include expenses of attendance at meetings. Members shall not be precluded from serving the corporation in any other capacity and receiving reasonable compensation for any such services.

2.16 Record Date. For the purposes provided by law, the Directors may fix in advance a record date for determining the members of the corporation, which record date, unless a shorter period is provided in the Articles of Organization, shall be not more than sixty (60) days prior to the event for which such determination is to be made. If such a record date is fixed by the Directors, only members of record on such record date shall have the right (except as otherwise provided in Article II, Section 2.10 of these Bylaws) to notice of and to vote at (if and to the extent they have the right to vote) the meeting (and any adjournment thereof) or the right to consent or dissent to any action, for which purpose such record date was fixed.

If no record date is fixed by the Directors, the record date for determining members having the right to notice of, or to vote at, a meeting of members shall be at the close of business on the day preceding the day on which notice is given. The record date for determining members for any other purpose shall be at the close of business on the day on which the Board of Directors acts with respect thereto.

2.17 Powers of Incorporators. Prior to the election of members of the corporation, the incorporators may exercise all rights of members and take any action required or permitted by law, the Articles of Organization, or these Bylaws to be taken by members.

ARTICLE III

HONORARY POSITIONS

Intentionally omitted.

ARTICLE IV

BOARD OF DIRECTORS

4.1 Powers. The affairs of the corporation shall be managed by the Board of Directors which shall have and may exercise all the powers of the corporation, except those powers reserved to the members by law, the Articles of Organization, or these Bylaws. The Board of Directors shall have all powers, rights, and obligations conferred by law upon a Board of Directors of a corporation organized under Massachusetts General Laws, Chapter 180. Unless otherwise provided, references in these Bylaws to authority or powers of Directors shall be construed to mean authority or powers of the Board of Directors and meetings of Directors shall be construed to mean meetings of the Board of Directors.

4.2 Number and Election. The Board of Directors shall consist of such number as shall be fixed by the Board of Directors from time to time, except that such number may be otherwise fixed by the members of the corporation at any annual, regular, or special meeting, but shall not in any event be less than three (3) Directors. Except as otherwise provided by law, by the Articles of Organization, or by these Bylaws, the Board of Directors shall be elected at the annual meeting of the members in the manner prescribed by law, by the Articles of Organization, and by these Bylaws. A Director may, but need not, be an officer or member.

4.3 Tenure. Except as otherwise provided by law, by the Articles of Organization, or by these Bylaws, and subject to a Director's earlier death, resignation, removal, or disqualification, a Director shall hold office until the next annual meeting of members and until a successor is elected and qualified.

4.4 Removal. Except as otherwise provided by law, by the Articles of Organization, or these Bylaws, a Director may be removed (i) with or without cause by an unanimous vote of the members then in office or (ii) with cause by vote of a majority of the Directors then in office. A Director may be removed with cause only after reasonable notice and opportunity to be heard.

4.5 Resignation. A Director may resign by delivering his or her written resignation to the president, treasurer, or clerk of the corporation, to a meeting of the members or Directors, or to the corporation at its principal office. Such resignation shall be effective upon receipt (unless specified to be effective at some other time) and acceptance thereof shall not be necessary to make it effective unless it so states.

4.6 Vacancies. Any vacancy in the Board of Directors may be filled by the members or, in the absence of member action, by a majority of the Directors then in office, although less than a quorum, or by a sole, remaining Director; except that vacancies resulting from enlargement of the Board of Directors may be filled only by the members and not by the Directors. Each successor shall hold office for the unexpired term or until such successor sooner dies, resigns, is removed, or becomes disqualified. Except as otherwise provided by law, by the Articles of Organization, or by these Bylaws, the Directors shall have and may exercise all their powers notwithstanding the existence of one or more vacancies in their number.

4.7 Regular Meetings. Regular meetings of the Board of Directors may be held at such places and at such times as the Directors may determine.

4.8 Special Meetings. Special meetings of the Board of Directors may be held at any time and at any place when called by the president or by three (3) or more Directors.

4.9 Notice of Meetings. Except as hereinabove provided, notice of all meetings of the Directors shall be given to each Director by the clerk or an assistant clerk or, in the case of the death, absence, incapacity, or refusal of such person(s), by the officer or one of the Directors calling the meeting. Notice shall be given to each Director in person or by telephone, telecopy or electronic mail or other equivalent electronic media, sent to such Director's last known business, home or electronic mail address, as appearing in the corporation's records, at least twenty-four (24) hours in advance of the meeting, or by written notice mailed to such Director's last known business or home address, as appearing in the corporation's records, at least forty-eight (48) hours in advance of the meeting. Notice of a meeting need not be given to any Director if a written waiver of notice executed by the Director before or after the meeting is filed with the records of the meeting, or to any Director who attends the meeting without protesting prior thereto or at its commencement the lack of notice to said Director. Any notice given hereunder shall state the place, date, and hour of the meeting, but need not specify the purposes of the meeting except that if an amendment to these Bylaws shall be a purpose of the meeting, the same shall be so stated in the notice.

4.10 Quorum. Except as otherwise required by law, by the Articles of Organization, or by these Bylaws, at any meeting of the Directors, a majority of the Directors then in office shall constitute a quorum. Any meeting may be adjourned by a majority of the votes cast upon the question, whether or not a quorum is present, and the meeting may be held as adjourned without further notice.

4.11 Action by Vote. Except as otherwise required by law, by the Articles of Organization, or by these Bylaws, when a quorum is present at any meeting, a majority of the Directors present and voting shall decide any question, including election of officers. Directors on the Board of Directors of the corporation or any

committee designated thereby may participate in a meeting of such Board or committee by means of a conference telephone or similar communications equipment by means of which all persons participating in the meeting can hear each other at the same time and participation by such means shall constitute presence in person at a meeting. Voting by proxy shall not be permitted at a meeting of the Board of Directors.

4.12 Action Without Meeting. Any action required or permitted to be taken at any meeting of the Directors may be taken without a meeting if all the Directors consent to the action in writing and the written consents are filed with the records of the meetings of Directors. Such consents shall be treated for all purposes as a vote at a meeting.

4.13 Committees. The Board of Directors in its discretion, by resolution passed by a majority of Directors then in office, may designate an executive and other committees, each committee to consist of one (1) or more Directors and which committee(s) shall have and may exercise such powers, to the extent permitted by law, the Articles of Organization, and these Bylaws, and to the extent possessed by the Board of Directors itself, as shall be conferred or authorized by the resolution(s) designating such committee. The Board of Directors shall have the power at any time to discharge, change the membership or authority of, or fill vacancies in, any such committee. Written minutes of all proceedings of any such committee shall be kept and made available upon request to each Director.

Except if and to the extent the Board of Directors may otherwise from time to time provide, a majority of the Directors then constituting the membership of any such committee shall constitute a quorum, except that when a committee shall have only one (1) Director, then one (1) Director shall constitute a quorum. When a quorum is present at any meeting of any such committee, a majority of those Directors present and voting shall be requisite and sufficient to effect any action or to decide any question or measure presented to the committee, unless a larger vote shall be required by law, by the Articles of Organization, by these Bylaws, or by resolution of the Board of Directors.

Notice of committee meetings shall be provided to each committee member in accordance with Section 4.9 of this Article, as if such committee meeting were a meeting of the Board of Directors.

Any action which could be taken at any meeting of a committee of the Board of Directors may be taken without such a meeting, if a written consent thereto is signed by all Directors then appointed to such committee, and such written consent is filed with the records of the meetings of such committee. Such consent shall be treated as a vote at a meeting of such committee for all purposes.

4.14 Adjournments. Any meeting of Directors may be adjourned to any other time and place as a majority of those Directors present at such meeting and voting shall determine. No notice of any adjourned meeting shall be required if (a) the time and place thereof are announced at the meeting at which the adjournment is taken, and (b) the adjournment is for fewer than thirty (30) days.

4.15 Compensation. Unless otherwise provided by law, the Articles of Organization, or these Bylaws, a Director shall be entitled to receive for such Director's services such reasonable amounts, if any, as the Board of Directors may determine, which may include expenses of attendance at meetings. A Director shall not be precluded from serving the corporation in any other capacity and receiving reasonable compensation for any such services.

ARTICLE V

OFFICERS AND AGENTS

5.1 Number and Qualification. The officers of the corporation shall be a president, treasurer, clerk, and such other officers, if any, as the Directors may determine, who shall have such duties, powers, and functions as hereinafter provided or as the Directors shall determine. An officer may but need not be a Director or member. The clerk shall be a resident of Massachusetts unless the corporation has a resident agent duly appointed for the purpose of service of process. A person may hold more than one office at the same time. If required by the Directors, any officer shall give the corporation a bond for the faithful performance of his or her duties in such amount and with such surety or sureties as shall be satisfactory to the Directors.

5.2 Election. Except as provided in Section 5.12 of this Article, the president, all vice presidents, the treasurer, and the clerk shall be elected annually by the Directors at their first meeting following the annual meeting of the members. Other officers, if any, may be elected by the Directors at any time.

5.3 Tenure. Except as otherwise provided by law, by the Articles of Organization, or by these Bylaws, the president, all vice presidents, the treasurer, the clerk, and each other officer of the corporation shall each hold office until the first meeting of the Directors following the next annual meeting of the members and until such officer's successor is chosen and qualified, unless a shorter period shall have been specified by the terms of such officer's election or appointment, or in each case until such officer sooner dies, resigns, is removed, or becomes disqualified.

5.4 Chairperson of the Board of Directors. If a chairperson of the Board of Directors is elected by the Board of Directors, such chairperson shall preside at all meetings of the Directors, except as the Directors shall otherwise determine, and shall have such other powers and duties as may be determined by the Directors.

5.5 President and Vice Presidents. The president shall be the chief executive officer of the corporation and, subject to the direction of the Directors, shall have general charge and supervision of the affairs of the corporation, shall see that orders and resolutions of the Directors are carried into effect, and shall make all decisions and perform all acts necessary to the conduct of the corporation between meetings of the Directors. The president shall preside at all meetings of the members and, if no chairperson of the Board of Directors is present, at all meetings of the Directors, except as the members or Directors otherwise determine.

The vice president or vice presidents, if any, shall have such duties and powers as the Directors shall determine. The vice president, or first vice president if there are more than one, shall have and may exercise all the powers and duties of the president during the absence of the president or in the event of the president's inability to act.

5.6 Treasurer. The treasurer shall be the chief financial officer and the chief accounting officer of the corporation. The treasurer, subject to the direction of the Directors, shall be in charge of general financial affairs, funds, securities, and valuable papers of the corporation and shall keep full and accurate records thereof, shall be in charge of the corporation's books of account and accounting records, and of the corporation's accounting procedures. The treasurer shall also have such other duties and powers as designated by the Directors or the president.

5.7 Clerk. The clerk shall record and maintain records of all proceedings of the members and Directors in a book or series of books kept for that purpose, which book or books shall be available at all reasonable times to the inspection of any member or Director for any proper purposes, but not to secure a list of members or other information for the purpose of selling lists or informational copies thereof or of using the same for a purpose other than in the interest of the applicant, as a member or Director, relative to the affairs of the corporation. Said books need not be kept in the same office. Such book or books shall also contain

- (i) records of all meetings of the incorporators,
- (ii) copies of the Articles of Organization and Bylaws, and
- (iii) the names and addresses of all members and Directors.

If the clerk is absent from any meeting of members or Directors, a temporary clerk chosen at the meeting shall exercise the duties of the clerk at the meeting.

5.8 Other Officers. The Board of Directors may elect other officers, in addition to those named hereinabove, including, without limitation, one or more assistant vice presidents, assistant treasurers, or assistant clerks. Such officers shall have such duties and powers as shall be designated from time to time by the Board

of Directors or the president and they shall be responsible to and shall report to the president or to such other officer as the president or the Board of Directors shall designate. In addition, unless otherwise determined by the Board of Directors or the president, all assistant vice presidents, assistant treasurers, and assistant clerks shall have the duties and powers hereinabove set forth and granted to the vice president, treasurer, and clerk, respectively.

5.9 Additional Powers and Duties. Each officer shall, subject to these Bylaws and to any applicable provisions of law and the Articles of Organization, have, in addition to the duties specifically set forth in these Bylaws, such duties and powers as are customarily incident to such officer's office and such additional duties and powers as the Directors may from time to time designate.

5.10 Removal. An officer may be removed with or without cause by vote of a majority of Directors then in office at any special meeting called for such purpose or at any regular meeting. An officer may be removed with cause only after reasonable notice and opportunity to be heard.

5.11 Resignation. An officer may resign by delivering such officer's written resignation to the president, treasurer, or clerk of the corporation, to a meeting of the members or Directors, or to the corporation at its principal office. Such resignation shall be effective upon receipt (unless specified to be effective at some other time), and acceptance thereof shall not be necessary to make it effective unless it so states.

5.12 Vacancies. Notwithstanding the provisions of Section 5.2 of this Article, if the office of any officer becomes vacant, the Directors may elect a successor at any meeting of the Directors. Each such successor shall hold office for the unexpired term, and, in the case of the president, treasurer, and clerk, until such officer's successor is elected and qualified, or in each case until such officer sooner dies, resigns, is removed, or becomes disqualified.

5.13 Compensation. An officer shall be entitled to receive reasonable compensation for services if so determined by the Board of Directors and in such amounts as the Board of Directors may from time to time determine. Officers shall not be precluded from serving the corporation in any other capacity and receiving reasonable compensation for any such services in such amounts as the Board of Directors may from time to time determine.

ARTICLE VI

EXECUTION OF PAPERS

Except as provided by law or in the Articles of Organization or as the Directors may generally or in particular cases authorize the execution thereof in some other

manner, all deeds, leases, transfers, contracts, bonds, notes, releases, checks, drafts, and other documents or instruments to be executed on behalf of the corporation may be signed by the president, by any vice president, or by the treasurer.

Any recordable instrument purporting to affect an interest in real estate, executed in the name of the corporation by two of its officers, of whom one is the president or a vice president and the other of whom is the treasurer or an assistant treasurer, shall be binding on the corporation in favor of a purchaser or other person relying in good faith on such instrument notwithstanding any inconsistent provisions of the Articles of Organization, these Bylaws, or resolutions or votes of the corporation.

ARTICLE VII

PERSONAL LIABILITY

It is intended that the incorporators, members, Directors, and officers of the corporation shall not be personally liable for any debt, liability, or obligation of the corporation and that all persons, corporations, or other entities extending credit to, contracting with, or having any claim against, the corporation, may look only to the funds and property of the corporation for the payment of any such contract or claim, or for the payment of any debt, damages, judgment, or decree, or of any money that may otherwise become due or payable to them from the corporation. Nothing contained in these Bylaws shall amend, alter, or impair any provision contained in the Articles of Organization relating to limitations of liability of Directors or officers of the corporation to the corporation or to its members.

ARTICLE VIII

INDEMNIFICATION AND INSURANCE

To the extent legally permissible, any person or class of persons (and such person's or class of persons' heirs and legal representatives) (i) who shall be, or shall at any time have been, a Director, trustee or officer of the corporation or (ii) who the Directors by their vote shall designate (A) who shall be, or who shall at any time have been, any other officer, employee or agent of the corporation, (B) who, at the request of the corporation, shall serve, or who shall at any time have served, as an incorporator, Director, trustee, officer, employee, agent or member of any other corporation, trust, association, firm or other organization, or (C) who shall serve, or who shall at any time have served, at the corporation's request in any capacity with respect to any employee benefit Plan (a "Plan Official"), (all of the persons described in this clause (ii) being referred to individually and without distinction as a "Designated Person"), shall be indemnified by the corporation against all liabilities, costs, and expenses reasonably incurred by, or imposed upon, him or her in

connection with, arising out of, or as a result of any claim, action, suit, or other proceeding (whether brought by or in the right of the corporation or such other corporation, trust, association, firm, plan, or otherwise), civil or criminal, or in connection with an appeal relating thereto, in which he or she may be or become involved or with which he or she may be threatened, as a party, witness, or otherwise, by reason of his or her being or having been such a Director, trustee, officer, or Designated Person, or by reason of any alleged action taken or omission made by him or her in any such capacity, whether or not he or she shall be such Director, trustee, officer, or Designated Person at the time any such liability, cost, or expense is incurred by, or imposed upon, him or her, provided such person shall not be entitled to indemnification to the extent prohibited by applicable law in effect from time to time, or to the extent, in any criminal action or proceeding, he or she shall have been determined to have had no reasonable cause to believe that his or her conduct was lawful.

The extent of the rights of indemnification, as hereinabove set forth, shall include, without limitation, all liabilities, costs, and expenses of defending, compromising, or settling any such claim, action, suit, or other proceeding, and the satisfaction of any judgment or decree entered or rendered therein, including the payment of fines or penalties imposed in criminal actions or proceedings.

Except as hereinabove provided, any such Director, trustee, officer, or Designated Person referred to herein who has been wholly successful, on the merits or otherwise, with respect to any claim, suit, or proceeding of the character described herein shall be entitled to such indemnification as is hereinabove provided as of right.

In the event that any such claim, action, suit, or other proceeding shall be compromised or settled, by consent decree or otherwise, such Director, president, treasurer, clerk, assistant clerk, or Designated Person shall also be entitled to such indemnification as of right, provided, however, that such compromise or settlement shall first have been approved by a vote of (a) the Board of Directors, acting by a quorum consisting of Directors who are not parties to (or who have been wholly successful with respect to) such claim, action, suit, or other proceeding or (b) the members of the Corporation entitled to vote.

Each person who shall at any time serve as such Director, president, treasurer, clerk, assistant clerk, or Designated Person shall be deemed so to serve in reliance upon the provisions hereinabove set forth, which provisions shall be in addition to any other rights of indemnification to which such person may be entitled pursuant to contract or to valid and applicable law, shall be separable and enforced to the extent permitted by valid and applicable law, and shall inure to the benefit of the legal representatives of such person.

In all other instances, such indemnification by the corporation shall be made solely at the discretion of the corporation, but only if (1) the Board of Directors, acting by a quorum consisting of Directors who are not parties to (or who have been wholly successful with respect to) such claim, action, suit, or other proceeding, shall find that such Director, president, treasurer, clerk, assistant clerk, or Designated Person has met the standards of conduct required by law or otherwise set forth in this Article VIII, (2) independent legal counsel shall deliver to the corporation their written advice that, in their opinion, such Director, president, treasurer, clerk, assistant clerk, or Designated Person has met such standards or (3) the members of the corporation entitled to vote shall vote that such Director, president, treasurer, clerk, assistant clerk or Designated Person has met such standards.

The termination of any claim, action, suit, or proceeding, civil or criminal, by judgment, settlement (whether with or without court approval) or conviction or upon a plea of guilty or of nolo contendere, or its equivalent, shall not create a presumption that such Director, president, treasurer, clerk, assistant clerk, or Designated Person did not meet the standards of conduct hereinabove set forth as entitling him or her to indemnification.

Expenses incurred with respect to any such claim, action, suit, or other proceeding shall be advanced by the corporation prior to the final disposition thereof upon receipt of an undertaking by or on behalf of the recipient to repay such amount if it shall ultimately be adjudicated that he or she is not entitled to indemnification hereunder, which undertaking shall be accepted without reference to the financial ability of such person to make repayment.

In respect of any period during which the corporation is a wholly-owned subsidiary of a corporation, the articles of organization or Bylaws of which, as amended, makes provision for the indemnification of a Director, president, treasurer, clerk, assistant clerk, or Designated Person of this corporation, indemnification shall be made to the fullest extent, in the manner and on the terms provided for, and available to each Director, president, treasurer, clerk, assistant clerk, or Designated Person of this corporation to whom such provision applies, in lieu of the foregoing provisions of this Article VIII.

The corporation shall have power to purchase and maintain insurance on behalf of any person who shall be, or who shall at any time have been, a Director, officer, employee, or other agent of the corporation, or who, at the request of the Corporation shall serve, or who shall at any time have served, as an incorporator, Director, trustee, officer, employee, agent, or member of another corporation, trust, association, firm or other organization, or as a Plan Official, against any liability incurred by him or her in any such capacity, or arising out of his or her status as such, whether or not the corporation would have the power to indemnify him or her against such liability.

ARTICLE IX

AMENDMENTS

These Bylaws may be amended or repealed upon the affirmative unanimous vote of the members of this corporation, provided that the substance of any such amendment is stated in the notice of the meeting of members. If expressly authorized by the Articles of Organization, then, subject to law, these Bylaws, and the Articles of Organization, these Bylaws may also be made, amended, or repealed, in whole or in part, by the Board of Directors, except with respect to any provision thereof which by law, the Articles of Organization, or these Bylaws requires action by the members.

The substance of any change to the Bylaws to be made by the Board of Directors shall be stated in the notice of the meeting of Directors at which the same is to be considered. Not later than the time of giving notice of the meeting of members next following the making, amending, or repealing by the Directors of any Bylaws, notice thereof stating the substance of such change shall be given to all members entitled to vote on amending the Bylaws. Any Bylaw adopted by the Directors may be amended or repealed by the members.

ARTICLE X

PROVISIONS OF LAW

These Bylaws shall be subject to such provisions of the statutory and common law of the Commonwealth of Massachusetts as may be applicable to corporations organized under Chapter 180 of the General Laws of the Commonwealth of Massachusetts. References herein to provisions of law shall be deemed to be references to the aforesaid provisions of law. All references in these Bylaws to such provisions of law shall be construed to refer to such provisions as from time to time amended.

ARTICLE XI

ARTICLES OF ORGANIZATION

These Bylaws shall be subject to the Articles of Organization of the corporation. All references in these Bylaws to the Articles of Organization shall be construed to mean the Articles of Organization of the corporation as from time to time amended or restated.

ARTICLE XII

MISCELLANEOUS

12.1 Transaction with Corporation. No contract or transaction between the corporation and one or more of its Directors, officers, or members, or between the corporation and any other corporation, partnership, association, trust, or other organization in which one or more of its Directors, officers, or members are Directors, officers, stockholders, trustees, or members, or have a financial interest, shall be void or voidable solely for this reason, or solely because the Director, officer, or member is present at or participates in the meeting of the Board of Directors or committee thereof which authorizes the contract or transaction, or solely because his or her votes are counted for such purposes, if:

- a. The material facts as to his or her relationship or interest and as to the contract or transaction are disclosed or are known to the Board of Directors or the committee, and the Board of Directors or committee in good faith authorizes the contract or transaction by the affirmative vote of a majority of a disinterested Directors, even though the disinterested Directors be less than a quorum; or
- b. The material facts as to his or her relationship or interest and as to the contract or transaction are disclosed or are known to the members entitled to vote thereon or the contract or transaction is specifically approved in good faith by the unanimous vote of the members; or
- c. The contract or transaction is fair as to the corporation as of the time it is authorized, approved or ratified by the Board of Directors, or a committee thereof or the members.

12.2 Ratification. Any transaction questioned on the ground of lack of authority, defective or irregular execution, adverse interest of a Director, officer, or member, non-disclosure, mis-computation, or the application of improper principles or practices of accounting, or on any other grounds, may be ratified before or after judgment by the Board of Directors or by the members entitled to vote; and, if so ratified, shall have the same force and effect as if the questioned transaction had been originally duly authorized, and such ratification shall be binding upon the corporation and shall constitute a bar to any claim or execution of any judgment in respect of such questioned transaction.

12.3 Reliance on Records. In performing his or her duties, a Director, officer, or incorporator of the corporation shall be entitled to rely on information, opinions, reports, or records, including financial statements, books of account, and other financial records, in each case presented by or prepared by or under the supervision of (1) one or more officers or employees of the corporation whom the Director, officer or incorporator reasonably believes to be reliable and competent in the matters presented, (2) counsel, public accountants, or other persons as to matters which the Director, officer, or incorporator reasonably believes to be within such

person's professional or expert competence, or (3) in the case of a Director, a duly constituted committee of the Board of Directors upon which he or she has not served, as to matters within its delegated authority, which committee the Director reasonably believes to merit confidence, but he or she shall not be considered to be acting in good faith if he or she has knowledge concerning the matter in question that would cause such reliance to be unwarranted. The fact that a Director, officer, or incorporator so performed his or her duties shall be a complete defense to any claim asserted against him or her under any provision of law or otherwise, except as expressly provided by statute, by reason of his or her being or having been a Director, officer, or incorporator of the corporation.

12.4 Corporate Records. The original or attested copies of the Articles of Organization, these Bylaws and records of all meetings maintained by the Clerk of the Corporation, shall be kept in Massachusetts at the principal office of the corporation or at the office of the Clerk or the resident agent of the corporation. Such copies and records need not all be kept in the same office.

* * *



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



ALTERNATIVE THERAPIES GROUP INC
24R PLEASANT ST UNIT 2
NEWBURYPORT MA 01950-2610

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, ALTERNATIVE THERAPIES GROUP INC is in compliance with its tax obligations under Chapter 62C of the Massachusetts General Laws.

This certificate doesn't certify that the taxpayer is compliant in taxes such as unemployment insurance administered by agencies other than the Department of Revenue, or taxes under any other provisions of law.

This is not a waiver of lien issued under Chapter 62C, section 52 of the Massachusetts General Laws.

What if I have questions?

If you have questions, call us at (617) 887-6367 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 8:30 a.m. to 4:30 p.m..

Visit us online!

Visit mass.gov/dor to learn more about Massachusetts tax laws and DOR policies and procedures, including your Taxpayer Bill of Rights, and MassTaxConnect for easy access to your account:

- Review or update your account
- Contact us using e-message
- Sign up for e-billing to save paper
- Make payments or set up autopay

Edward W. Coyle, Jr., Chief
Collections Bureau



The Commonwealth of Massachusetts
Secretary of the Commonwealth
State House, Boston, Massachusetts 02133

William Francis Galvin
Secretary of the
Commonwealth

Date: May 03, 2018

To Whom It May Concern :

I hereby certify that according to the records of this office,

ALTERNATIVE THERAPIES GROUP, INC.

is a domestic corporation organized on **April 26, 2018** , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



In testimony of which,

I have hereunto affixed the

Great Seal of the Commonwealth

on the date first above written.

William Francis Galvin

Secretary of the Commonwealth

Certificate Number: 18050090210

Verify this Certificate at: <http://corp.sec.state.ma.us/CorpWeb/Certificates/Verify.aspx>

Processed by:

The Commonwealth of Massachusetts

William Francis Galvin

Secretary of the Commonwealth

One Ashburton Place, Boston, Massachusetts 02108-1512

FORM 1001-01/2018

Articles of Entity Conversion of a Domestic Non-Profit with a Pending Provisional or Final Certification to Dispense Medical Use Marijuana to a Domestic Business Corporation (General Laws Chapter 156D, Section 9.53; 950 CMR 113.30)

FORM 1001-01/2018

Alternative Therapies Group, Inc. is a Medical
Marijuana Treatment Center with the
Department of Public Health in accordance
with 105 CMR 725.004 as of April 19, 2018.

Bryan Harter

Director

Medical Use of Marijuana Program
Bureau of Healthcare Safety and Quality
Massachusetts Department of Public Health

- (1) Exact name of the non-profit: Alternative Therapies Group, Inc.
- (2) A corporate name that satisfies the requirements of G.L. Chapter 156D, Section 4.01:
Alternative Therapies Group, Inc.
- (3) The plan of entity conversion was duly approved in accordance with the law.
- (4) The following information is required to be included in the articles of organization pursuant to G.L. Chapter 156D, Section 2.02(a) or permitted to be included in the articles pursuant to G.L. Chapter 156D, Section 2.02(b):

ARTICLE I

The exact name of the corporation upon conversion is:

Alternative Therapies Group, Inc.

ARTICLE II

Unless the articles of organization otherwise provide, all corporations formed pursuant to G.L. Chapter 156D having the purpose of engaging in any lawful business. Please specify if you want a more limited purpose.

The purpose of the corporation is to (1) engage in the retail, wholesale and distribution of products including products that contain cannabis and other related products but only in accordance with the laws of the Commonwealth of Massachusetts; (2) grow, cultivate, and manufacture cannabis products; and (3) conduct any other related or unrelated, lawful activity under Massachusetts law.

WITHOUT PAR VALUE		WITH PAR VALUE		
TYPE	NUMBER OF SHARES	TYPE	NUMBER OF SHARES	PAR VALUE
		Common	250,000	\$0.01

ARTICLE III

State the total number of shares and par value, * if any, of each class of stock that the corporation is authorized to issue. All corporations must authorize stock. If only one class or series is authorized, it is not necessary to specify any particular designation.

ARTICLE IV

Prior to the issuance of shares of any class or series, the articles of organization must set forth the preferences, limitations and relative rights of that class or series. The articles may also limit the type or specify the minimum amount of consideration for which shares of any class or series may be issued. Please set forth the preferences, limitations and relative rights of each class or series and, if desired, the required type and minimum amount of consideration to be received.

The number of authorized shares of any class or series, the distinguishing designation thereof and the preference, limitations and relative rights applicable thereto may be set forth in any amendment to these articles of organization approved by the board of directors of the corporation.

At any time, after the initial issuance of shares of any class or series, the board of directors of the corporation may reclassify any unissued shares of any class or series into one or more existing or new classes or series.

ARTICLE V

The restrictions, if any, imposed by the articles or organization upon the transfer of shares of any class or series of stock are:

None

ARTICLE VI

Other lawful provisions, and if there are no such provisions, this article may be left blank.

- i. No director shall be personally liable to the corporation for monetary damages for breach of fiduciary duty as a director notwithstanding any provision of law imposing such liability; provided, however, that this provision shall not eliminate the liability of a director, to the extent that such liability is imposed by applicable law, (i) for any breach of such director's duty of loyalty to the corporation or its shareholders, (ii) for acts or omissions not in good faith or which involve intentional misconduct or a knowing violation of law, except for intentional misconduct or knowing violations of federal laws that (a) are related to the cultivation or sale of marijuana and (b) conflict with Massachusetts laws (iii) for improper distributions under Section 6.40 or successor provisions of the Massachusetts Business Corporation Act, or (iv) for any transaction from which such director derived an improper personal benefit. No amendment to or repeal of this provision shall apply to or have any effect on the liability or alleged liability of any director for or with respect to any acts or omissions of such director occurring prior to such amendment or repeal.

- ii. The purposes for which an annual meeting of shareholders is to be held need not be stated in any notice of such meeting and, accordingly, the purposes of such meeting shall be unlimited, unless and to the extent otherwise provided in such notice.
- iii. The board of directors of the corporation shall have the power to amend the bylaws of the corporation in the manner provided in such bylaws.
- iv. Any action required or permitted to be taken at a shareholders meeting may be taken without a meeting if the action is taken by shareholders having not fewer than the minimum number of votes necessary to take the action at a meeting at which all shareholders entitled to vote on the action are present and voting. Such action shall be evidenced by one or more written consents that describe the action taken, are signed by shareholders having the requisite votes, bear the date of the signatures of such shareholders and are delivered to the corporation for inclusion with the records of meetings within 60 days of the earliest dated consent delivered to the corporation.
- v. The board of directors of the corporation may consist of only one or two members even though the corporation has more than one shareholder.

Note: The preceding six (6) articles are considered to be permanent and may be changed only by filing appropriate articles of amendment.

ARTICLE VII

The effective date of organization of the corporation is the date and time the articles were received for filing if the articles are not rejected within the time prescribed by law. If a later effective date is desired, specify such date, which may not be later than the 90th day after the articles are received for filing:

None.

ARTICLE VIII

The information contained in this article is not a permanent part of the articles of organization.

- a. The street address of the initial registered office of the corporation in the commonwealth: 24R Pleasant St, Unit 2, Newburyport, MA 01950
- b. The name of its initial registered agent at its registered office: Christopher Edwards
- c. The names and addresses of the individuals who will serve as the initial directors, president, treasurer, CEO and secretary of the corporation (an address need not be specified if the business address of the officer or director is the same as the principal office location):

President: Scott Reed - 64 Jasper St, Scarborough, ME 04074

Treasurer: Kevin Lombardi - 6 Martinack Avenue, Peabody, MA 01960

Secretary: Sherie Kennedy - 17 Town Hall Rd, Newton, NH 03858

Vice President: Sherie Kennedy – 17 Town Hall Rd, Newton, NH 03858

CEO: Christopher Edwards - 24R Pleasant St, Unit 2, Newburyport, MA 01950

Director(s):

1. Edward Jenkins – 17 Peaslee Crossing Road, Newton, NH 03858
2. Tracy Lessor PHD – 63 W68th St., Apt. 4A New York, NY 10023
3. Scott Reed – 64 Jasper St, Scarborough, ME 04074
4. Kevin Lomardi – 6 Martinack Avenue, Peabody, MA 01960
5. Sherie Kennedy – 17 Town Hall Rd, Newton, NH 03858

- d. The fiscal year end of the corporation: December
- e. A brief description of the type of business in which the corporation intends to engage:
Manufacture, cultivate, promote, market, sell and distribute cannabis and related products
- f. The street address of the principal office of the corporation: 24R Pleasant St, Unit 2,
Newburyport, MA 01950
- g. The street address where the records of the corporation required to be kept in the
commonwealth are located is: 24R Pleasant St, Unit 2, Newburyport, MA 01950, which
is

- ☒ its principal office;
☐ an office of its transfer agent;
☐ an office of its secretary/assistant secretary;
☐ its registered office.

[Signature to follow]

Signed By: _____


Scott Reed

- ☐ Chairman of the Board of Directors
- ☒ President
- ☐ Other Officer
- ☐ Court Appointed fiduciary

on this 14th day of March, 2018

Business Plan

Executive Summary

Alternative Therapies Group, Inc. (ATG) is a vertically-integrated, state-regulated medical marijuana company established in Massachusetts in 2012. ATG adheres to comprehensive cultivation and MIPs production practices to provide high quality, dose-consistent, contaminant-free marijuana and marijuana products, and dispenses these products in secure, professionally operated retail stores.

Products and Services

ATG cultivates approximately 30 strains of marijuana, and produces approximately 30 SKUs of MIPs and concentrates at this time. Our current product line-up includes dried flower, pre-rolls, tinctures, capsules, salves, chocolates, gummies and mints.

Strategy and Implementation

ATG currently cultivates, manufactures and dispenses marijuana products to adults 21 and over, in addition to our current medical-only operations. Adult-use sales have commenced at all three locations pursuant to all necessary state and local approvals, including special permits, and adult-use retail licenses (issued by the Massachusetts Cannabis Control Commission). ATG has leveraged its existing cultivation and product manufacturing facilities, equipment, intellectual property, plant genetics, well-trained staff and other assets to make a seamless transition from medical to adult-use.

Organization & Management Team

CEO: Christopher Edwards

President: Daniel Talbot

Director of Retail Operations: Yajaira Fuentes

Director of Cultivation: Mike Young

Controller: Colleen Hayden

HR Director: Beth Humphries

Financial Plan and Projections

ATG has managed to achieve a position of financial stability since it began dispensing products to registered patients in June 2015. There is currently no outstanding debt on its balance sheet, and it has

built sufficient cash reserves to fund all pending capital expenditures related to its expansion into the adult-use market through reinvestment. ATG plans to continue to fund expansion efforts without accepting any outside capital at this time.

Diversity Plan

Introduction

ATG is an equal opportunity employer. With regard to hiring and staffing, our goal is simply to attract and retain the best individuals that we can regardless of ethnicity, gender, veteran status, disability, religion, or sexual orientation. This is evidenced by the fact that ATG already has a diverse work force, including a minority owner (Julio Fuentes), multiple veterans, multiple women in leadership roles, and at least one person who is permanently disabled. Compensation is equitable throughout the company, and is commensurate with experience, job responsibilities, and market conditions. We hire based on ability to perform job duties, proven track record, applicable qualifications, professional references, clean background, and our best judgement as to trustworthiness.

Purpose

To promote and support an environment which values and affirms equal opportunity, diversity and inclusivity in accordance with ATG principles of equity, fairness and social justice, while ensuring that ATG complies with its legal responsibilities in accordance with relevant legislation.

Scope

This policy applies to all employees.

Policy Statement

ATG is actively committed to promoting the principles of equal opportunity and strives to support Employees to achieve their full potential in an environment which is fair, inclusive, diverse and supports the health and wellbeing of its employees.

ATG will strive to enhance the workforce representation of under-represented diversity groups through supportive strategies and programs which recognize the needs of these individuals and provide proactive responses to enable employees to integrate their personal responsibilities with the demands of the workplace.

ATG is actively committed to the prevention of discrimination, bullying, harassment, victimization and vilification in the workplace, and will take all reasonable steps and actions to ensure that employees are treated fairly and with dignity and respect while working for the company.

Principles

ATG is committed to the promotion of equity and recognition of diversity in employment. It aims to provide a work environment that fosters fairness, equity, and respect for social and cultural diversity, and that is free from unlawful discrimination, bullying, harassment, vilification and victimization.

In support of this commitment, ATG endeavors to:

- Foster a culture which values and responds to the rich diversity of its community
- Provide an inclusive and flexible environment for employees by identifying and removing any remaining systemic barriers to equitable access, participation and progression in employment so that all employees have the opportunity to fully contribute to life at the company
- Ensure that employees are aware of their rights and their responsibilities
- Use non-discriminatory, inclusive language and practices
- Develop proactive plans and programs to increase access and promote success in employment for designated under-represented groups in order to overcome disadvantage
- Ensure that all employees have fair access to benefits and services in an equitable manner, including assistance to reasonably accommodate a person's disability
- Educate the staff about the goals and philosophy of equal opportunity, equity and social justice
- Develop and promote processes that support the systematic implementation, monitoring, reporting and management of equal opportunity and eliminate unlawful direct and indirect discrimination and harassment, and workplace bullying
- Provide effective mechanisms to resolve complaints of unlawful discrimination, bullying, harassment, vilification and victimization
- Create a culture of support for employees affected by domestic and family violence

All employees are responsible for understanding and applying the principles of equal opportunity, equity and social justice. Managers are particularly responsible for taking reasonably practicable steps to ensure that the work environment is safe, inclusive and free from discrimination, bullying and harassment.

ATG will ensure that employees are trained in equal opportunity, equity, diversity and social justice matters and that targeted training is available to employees with management and supervisory responsibilities.

Equity and diversity groups

Diversity involves recognizing the value of individual differences in the workplace. Diversity in this context for the company includes age, cultural background, disability, ethnicity, family responsibilities, gender, language, religious belief and sexual orientation. Diversity also refers to the other ways in which people are different, such as educational level, life experience, work experience, socio-economic background, personality and marital status.

Equity relates to fair treatment. The company's equity objective is to ensure that people from all groups in society have the opportunity to participate in employment with the company. Target groups include but are not limited to people with disabilities, women in areas where they are currently under-represented, people of diverse sexual orientation, sex or gender identity (e.g. LGBTI), and people from culturally and linguistically diverse backgrounds.

Equal opportunity, Harassment and Discrimination

Equal opportunity is about ensuring that everyone has equal access to, and opportunity to take part in, areas of public life such as education, employment, accommodation and access to goods and services.

To support this goal, ATG will develop and implement programs and initiatives which aim to support equality in all areas of employment, including but not limited to:

- Recruitment
- Retention
- Resignation and turnover
- Performance management
- Promotion and career progression
- Talent identification and management
- Succession planning
- Training and development

Equal opportunity, anti-discrimination and human rights laws set the standard for the way individuals treat each other in these areas, and provides remedies for people who have been treated unfairly.

The company is committed to taking all reasonable steps to prevent and eradicate unlawful discrimination, bullying and harassment against individuals in the work environment.

To fulfil this commitment, the company will implement a range of proactive and preventative strategies and programs, including provision of training and professional development opportunities for employees to raise awareness of equal opportunity, discrimination, bullying and harassment, and provide strategies to prevent this from occurring in the workplace.

Health and wellbeing

ATG aims to create a workplace culture and environment that values, supports and promotes programs and strategies that improve the physical and mental health and wellbeing of employees.

The company aspires to create a safe, healthy and resilient work environment through activities underpinned by the guiding principles that health and wellbeing initiatives should:

- Be informed by the World Health Organization definition of a Healthy Workplace and health and wellbeing as a state of complete physical, mental and social wellbeing - and not merely the absence of disease or infirmity
- Promote positive health and wellbeing for all employees
- Equip, facilitate and support employees to improve and maintain their health and wellbeing through components which aim to:
 - Increase the health knowledge and skills of employees
 - Promote and facilitate active participation by employees in health promoting initiatives, and
 - Create health promoting environments

Domestic and Family Violence

ATG aims to create a working environment that allows employees to safely seek support to address issues arising from domestic and family violence.

The company recognizes that employees may face situations of domestic and family violence that may have an impact on their attendance and productivity at work. The company is committed to providing support to employees who are affected by domestic and family violence.

ATG Code of Ethics

1. Employees shall, in performing his or her duties:
2. Exercise reasonable care and skills;
3. Act impartially;
4. Act with probity;
5. Treat members of the public and other employees with courtesy and sensitivity to their rights, duties and aspirations;
6. Not harass a member of the public or another employee, whether sexually or otherwise;
7. Not unlawfully coerce a member of the public or another employee;
8. Comply with any lawful and reasonable direction given by a person having authority to give direction;
9. If the employee has an interest, pecuniary or otherwise, that could conflict, or appear to conflict, with the proper performance of his or her duties - disclose the interest to his or her manager; and
 - a. take reasonable action to avoid the conflict;
 - b. as soon as possible after the relevant facts come to the employee's notice;
10. Not take, or seek to take, improper advantage of his or her position in order to obtain a benefit for the employee or any other person;
11. Not take, or seek to take improper advantage, for the benefit of the employee or any other person, of any information acquired, or any document to which the employee has access, as a consequence of his or her employment;
12. Not disclose, without lawful authority –
 - a. any information acquired by him or her as a consequence of his or her employment; or
 - b. any information acquired by him or her from any document to which he or she has access as a consequence of his or her employment;
13. Not make a comment that he or she is not authorized to make where the comment may be expected to be taken to be an official comment;
14. Not make improper use of the property of the company;
15. Avoid waste and extravagance in the use of the property of the company;
16. Report to an appropriate authority – Any inappropriate conduct that comes to his or her attention;

Resolving Workplace Issues:

- Make sure communication within the team is open, clear and friendly;
- Implement an 'Open Door' protocol;
- Monitor potential bullying, harassment or low morale;
- Provide constructive performance guidance, including positive feedback.

Strategies to promote respect and courtesy

- Develop a set of agreed team behaviors that embed company values and code of conduct;
- Incorporate ATG values into performance planning and feedback cycles for all staff;
- Agree on a process for team members to provide feedback;
- Include a team building session at planning days or team meetings;
- Ensure support for a culturally inclusive workplace;
- Verify that all staff have read, understood and apply the company's policy on harassment and bullying;
- Discuss staff survey results with teams and identify any areas for improvement.



Maintaining of financial records

ATG maintains its financial records within QuickBooks, including all retail and wholesale revenue, all expenses, wages, capital expenditures, liabilities, and all other items that would appear on ATG's profit and loss or balance sheet. These records cover:

1. Assets and liabilities;
2. Monetary transactions;
3. Books of accounts, including journals, ledgers, and supporting documents,
4. Sales records including the cost of marijuana products; and
5. Salary and wages paid to each employee, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment.

Alternative Therapies Group

Alternative Therapies Group, Inc.
Employee Manual Version 7.1

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Alternative Therapies Group, Inc. Employee Manual

Section 1: Introduction

This Manual is designed to acquaint you with Alternative Therapies Group, Inc. ("ATG" or "the Company") and provide you with information about working conditions, benefits, and policies affecting your employment. The information contained in this Manual applies to all employees of ATG. Following the policies described in this Manual is considered a condition of continued employment. However, nothing in this Manual alters an employee's status as an at-will employee. The contents of this Manual shall not constitute nor be construed as a promise of employment or as a contract between the Company and any of its employees. The Manual is a summary of our policies, which are presented here only as a matter of information. You are responsible for reading, understanding, and complying with the provisions of this Manual. Our objective is to provide you with a work environment that is conducive to both personal and professional growth.

This Employee Handbook shall remain available for inspection by the Massachusetts Department of Health and any other authorized government agency upon request.

1.1 Changes in Policy

This Manual supersedes all previous employee manuals and memos that may have been issued from time to time on subjects covered in this Manual. However, since our business and our organization are subject to change, we reserve the right to interpret, change, suspend, cancel, or dispute with or without notice all or any part of our policies, procedures, and benefits at any time. We will notify all employees of these changes. Changes will be effective on the dates determined by the Company, and after those dates, all superseded policies will be null. No individual supervisor or manager has the authority to change policies at any time. If you are uncertain about any policy or procedure, speak with your direct supervisor.

1.2 Employment Applications

We rely upon the accuracy of information contained in the employment application and the accuracy of other data presented throughout the hiring process and employment. Any misrepresentations, falsifications, or material omissions in any of this information or data may result in exclusion of the individual from further consideration for employment or, if the person has been hired, termination of employment.

Each applicant must submit 3 professional references, and they must be verified, before an offer of employment may be extended. Additionally, all applicants must submit to a background check consistent with MA state law and regulations. This background check will include a CORI check and mandatory fingerprinting at a minimum, and may include several additional checks based on current state requirements. Please note that all employees are required to complete a background check at least once annually in order to maintain eligibility to work for the company.

1.3 Employment Relationship

You enter into employment voluntarily, and you are free to resign at any time for any reason or no reason. Similarly, ATG is free to conclude its relationship with any employee at any time for any reason or no reason. ATG requests that employees follow the termination policy set forth in Section 3.13.

Section 2: Definitions of Employee Status

“Employees” Defined

An “employee” of ATG is a person who regularly works for ATG on an hourly wage or salary basis. “Employees” may include exempt, non-exempt, regular full-time, regular part-time, voluntary and temporary persons, and others employed with the Company who are subject to the control and direction of ATG in the performance of their duties.

Exempt

Employees whose positions meet specific criteria established by the Fair Labor Standards Act (FLSA) and corresponding state law requirements and who are exempt from overtime pay requirements.

Non-Exempt

Employees whose positions do not meet FLSA and applicable state law criteria and who are paid one and one-half their regular rate of pay for hours worked in excess of 40 hours per week.

Regular Full-Time

Employees who are regularly scheduled to work 40 hours per week. Generally, they are eligible for the Company’s benefit package, subject to the terms, conditions, and limitations of each benefit program.

Regular Part-Time

Employees who are regularly scheduled to work less than 40 hours per week. Regular part-time employees may be eligible for some benefits sponsored by the Company, subject to the terms, conditions, and limitations of each benefit program.

Temporary (Full-Time or Part-Time)

Those whose performance is being evaluated to determine whether further employment in a specific position or with the Company is appropriate, or individuals who are hired as interim replacements to assist in the completion of a specific project or for vacation relief. Employment beyond any initially stated period does not in any way imply a change in employment status. Temporary employees retain that status until they are notified of a change. Temporary employees only are entitled to statutory benefits.

Section 3: Employment Policies

3.1 Non-Discrimination

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at ATG are based on merit, qualifications, and abilities. ATG does not discriminate in employment opportunities or practices because of race, color, religion, sex, national origin, age, disability, sexual orientation, military or veteran status, genetics, gender identity or expression or any other characteristic protected by federal, state or local law. ATG will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship. This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training. Employees with questions or concerns about discrimination in the workplace are encouraged to bring these issues to the attention of their supervisor. Employees may raise concerns and make reports without fear of reprisal. Anyone found to be engaging in unlawful discrimination would be subject to disciplinary action, up to and including termination of employment.

3.2 Non-Disclosure/Confidentiality

The protection of confidential business information and trade secrets is vital to the interests and success of ATG. Such confidential information includes, but is not limited to, the following examples: patient information, operational procedures, financial information, marketing strategies, pending projects and proposals, proprietary growing and production processes and other employees' personnel/payroll records. All employees are required to sign a non-disclosure agreement as a condition of employment. Employees who improperly use or disclose trade secrets or confidential business information will be subject to disciplinary action, including termination of employment and legal action, even if they do not directly benefit from the disclosed information.

3.3 New Employee Orientation

Orientation is a formal welcoming process that is designed to make the new employee feel comfortable, informed about the company, and prepared for their position. New employee orientation is conducted by the Human Resources Manager, or another qualified company representative, and includes an overview of the company history, an explanation of the company core values, vision, and mission; and company goals and objectives. In addition, the new employee will be given an overview of benefits, tax, and legal issues, and complete any necessary paperwork. Employees are presented with all personal key codes, keys, biometrics setup and procedures needed to navigate within the workplace. The new employee's supervisor then introduces the new hire to staff throughout the company, reviews their job description and scope of position, explains the company's evaluation procedures, and helps the new employee get started on specific functions.

3.4 Facility Hours

ATG's dispensary is open for employee access from 8:00am to 6:00pm., Monday through Saturday, except for Holidays (see Section 6.6, Holidays). The cultivation facility is open for employee access from 8:00am to 6:00pm, seven days per week. The standard workweek is 40 hours (see Section 5.3, Overtime). In the computation of various employee benefits, the employee workweek is considered to begin on Sunday (starting at 12:00am) through Saturday (ending at 11:59 pm), unless a supervisor makes other arrangements with the employee.

3.5 Lunch Periods

Employees are allowed a one-hour lunch break. The break is unpaid for non-exempt employees. Lunch breaks generally are taken between the hours of 11:00am and 2:00pm on a staggered schedule, in order to maintain proper coverage in ATG facilities.

3.6 Break Periods

ATG does not provide for employees to divert from work responsibilities except for the above outlined lunch period. If employees have unexpected personal business to take care of, they must notify their direct supervisor to discuss time away from work and make arrangements as necessary. Unless otherwise provided herein, personal business should be conducted on the employee's own time. Employees who do not adhere to the break policy will be subject to disciplinary action, including the possibility of termination.

3.7 Personnel Files

Employee personnel files may include the following: job application, job description, résumé, records of participation in training events, salary history, records of disciplinary action and documents related to employee performance reviews, coaching, and mentoring. Personnel files are the property of ATG, and access to the information is restricted. Management personnel of ATG who have a legitimate reason to review the file are allowed to do so. Employees who wish to review their own file should contact their supervisor or the Human Resources Manager. With reasonable advance notice, the employee may review his/her personnel file in Company's office and in the presence of their supervisor or Human Resources Manager in accordance with applicable law.

3.8 Personnel Data Changes

It is the responsibility of each employee to promptly notify their supervisor or ATG Human Resources Department of any changes in personnel data such as mailing address, telephone numbers, name and number of dependents, and Individuals to be contacted in the event of an emergency. An employee's personnel data should be accurate and current at all times.

3.9 Inclement Weather/Emergency Closings

At times, emergencies such as severe weather, fires, or power failures can disrupt company operations. The decision to close the office will be made by the Executive Management Team. When the decision is made to close for business, employees will receive official notification from their supervisors. Time off from scheduled work due to emergency closings will be unpaid for all non-exempt employees. However, if employees would like to be paid, they are permitted to use

vacation time if it is available to them. If a non-exempt employee is called into work and then released due to inclement weather, ATG will pay the employee for a minimum of three working hours.

3.10 Employee Performance Review and Planning Sessions

Supervisors will conduct performance reviews and planning sessions with all regular full-time and regular part-time employees beginning after 12 months of service. Supervisors may conduct informal performance reviews and planning sessions more often if they choose. Performance reviews and planning sessions are designed for the supervisor and the employee to discuss his/her current job tasks, encourage and recognize attributes, and discuss positive, purposeful approaches for meeting work-related goals. Together, the employee and supervisor discuss ways in which the employee can accomplish goals or learn new skills. The planning sessions are designed for the employee and his/her supervisor to make and agree on new goals, skills, and areas for improvement.

ATG directly links wage and salary increases with both individual and company performance. Your performance review and planning sessions will have a direct effect on any changes to your compensation. For this reason, along with others, it is important to prepare for these reviews carefully, and participate in them fully. A positive performance evaluation does not, however, guarantee a salary increase. Employees will be reviewed according to the regular annual schedule.

3.11 Outside Employment

Employees may hold outside jobs in non-related businesses or professions as long as the employee meets the performance standards of their job description with ATG. Unless an alternative work schedule has been approved by ATG, employees will be subject to the company's scheduling demands, regardless of any existing outside work assignments. ATG intellectual property, facilities, equipment, and materials are not to be used for outside employment.

3.12 Corrective Action

ATG holds each of its employees to certain work rules and standards of conduct (see Section 4). When an employee deviates from these rules and standards, ATG expects the employee's supervisor to take corrective action as is appropriate under the circumstances. ATG considers certain rule infractions and violations of standards as grounds for immediate termination of employment. These include but are not limited to: theft or diversion of medicine in any form, insubordinate behavior, engaging in un-safe practices with regard to operation of the Marijuana Establishment, being convicted or entering a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, 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, vandalism or destruction of company property, being on company property during non-business hours, the use of company equipment and/or company vehicles without prior authorization by the Executive Management Team, untruthfulness about personal work history, skills, or training, divulging confidential and

proprietary Company business practices, and misrepresentations of ATG to a client, a prospective client, a vendor, the general public, or an employee.

3.13 Employment Termination

Termination of employment is an inevitable part of personnel activity within any organization, and many of the reasons for termination are routine. Below are a few examples of some of the most common circumstances under which employment is terminated:

Resignation – voluntary employment termination initiated by an employee.

Termination – involuntary employment termination initiated by ATG.

Layoff – involuntary employment termination initiated by ATG for non-disciplinary reasons.

Both the employee and ATG have the right to terminate employment at will, with or without cause. Any employee who terminates employment with ATG shall return all files, records, keys, and any other materials that are property of ATG. Furthermore, any outstanding financial obligations owed by the employee to ATG will also be deducted from the employee's final check in accordance with applicable law.

Employee benefits will be affected by employment termination in the following manner: all accrued vested benefits that are due and payable at termination will be paid. Some benefits may be continued at the employee's expense (see Section 6, Benefits) if the employee elects to do so. The employee will be notified of the benefits that may be continued and of the terms, conditions, and limitations.

All departing employees are required to complete an exit interview prior to departure.

3.14 Safety

ATG provides information to employees about workplace safety and health issues through regular internal communication such as:

- Training sessions
- Team meetings
- Bulletin board postings
- Memorandums
- Other written communications

Each employee is expected to obey safety rules and exercise caution and common sense in all work activities. Employees must immediately report any unsafe conditions to their supervisor. Employees who violate safety standards, cause hazardous or dangerous situations, or fail to report, or where appropriate, remedy such situations, may be subject to disciplinary action including termination of employment. In the case of an accident that results in injury, regardless

of how insignificant the injury may appear, employees should notify their supervisor (see Section 3.15, Employee Requiring Medical Attention).

3.15 Employee Requiring Medical Attention

ATG provides a Workers' Compensation Insurance program for employees who are injured in the course and scope of employment. This program covers any injury or illness sustained in the course of employment that requires medical, surgical, or hospital treatment. Accordingly, employees must report all work-related injuries and incidents, no matter how small, within 24 hours to their supervisor or other specified person.

A physician's "return to work" notice may be required.

3.16 Building Security

All employees who are issued keys or RFID cards to ATG facilities are responsible for their safekeeping. All employees will abide by the ATG Operations Manual.

3.17 Insurance on Personal Effects

All employees should be sure that their own personal insurance policies cover the loss of anything occasionally left at the office. ATG assumes no risk for any loss or damage to personal property.

3.18 Supplies; Expenditures; Obligating the Company

Only authorized persons may purchase supplies or services on behalf of ATG. No employee whose regular duties do not include purchasing shall incur any expense on behalf of ATG or bind ATG by any promise or representation without written approval.

3.19 Expense Reimbursement

Expenses incurred by an employee must have prior approval by a supervisor. Reimbursements under \$25.00 will be included in the employee's next regular paycheck. An example of such an expense would include mileage. If the amount is more than \$25.00, the reimbursement request will be processed like an invoice. All completed reimbursement request forms should be provided to the Chief Financial Officer.

3.20 Parking

Employees must park their cars in areas designated by the Company.

3.21 Visitors in The Workplace

To provide for the safety and security of employees, visitors, and ATG property, only authorized visitors are allowed into the workplace. Restricting unauthorized visitors helps ensure security, decreases insurance liability, protects confidential information, safeguards employee welfare, and avoids potential distractions and disturbances.

All visitors must enter through the main entrance, sign-in, and sign-out at the main entrance, and receive a 'Visitor' badge to wear while on premises. Authorized visitors will be escorted to their destination and must be accompanied by an employee at all times. Requirements specific to DPH's Medical Use of Marijuana Regulations will govern all visitor access policies.

3.22 Immigration Law Compliance

ATG employs only individuals who are authorized to work in the United States in compliance with the Immigration Reform and Control Act of 1986. Each new employee, as a condition of employment, must complete the Employment Eligibility Verification Form I-9 and present documentation establishing identity and employment eligibility. The Company may require employees to recertify in accordance with existing law. Former employees who are rehired must also complete the form if they have not completed an I-9 with ATG within the past three years or if their previous I-9 is no longer retained or valid.

Section 4: Standards of Conduct

The work rules and standards of conduct for ATG are important, and the Company takes them seriously. All employees are urged to become familiar with these rules and standards. In addition, employees are expected to follow the rules and standards faithfully in performance of their own jobs and while conducting the Company's business. Please note that any employee who deviates from these rules and standards will be subject to corrective action, up to and including termination of employment (see Section 3.12, Corrective Action). While not intended to list all the forms of behavior that are considered unacceptable in the workplace, the following are examples of rule infractions or misconduct that may result in disciplinary action, including termination of employment:

Theft or inappropriate removal or possession of property; Falsification of timekeeping records (see Section 5.2, Timekeeping); Working under the influence of alcohol or illegal drugs (see Section 4.6, Substance Abuse); Possession, distribution, sale, transfer, or use of alcohol or illegal drugs in the workplace (see Section 4.6, Substance Abuse); Fighting or threatening violence in the workplace; Boisterous or disruptive activity in the workplace; Negligence or improper conduct leading to damage of company-owned or patient-owned property; Insubordination or other disrespectful conduct; Violation of safety or health rules; Smoking in the workplace; Sexual or other unlawful or unwelcome harassment (see Section 4.3, Harassment, Including Sexual Harassment); Excessive absenteeism or any absence without notice (see Section 4.1 Attendance/Punctuality and 4.2, Absence without Notice); Unauthorized use of telephones, or other company-owned equipment (see Section 4.4, Telephone Use); Using company equipment for purposes other than business (i.e. playing games on computers or personal Internet usage); Unauthorized disclosure of business "secrets" or confidential information; Violation of personnel policies; and Unsatisfactory performance or conduct.

4.1 Attendance/Punctuality

The Company expects that every employee will be regular and punctual in attendance. This means being on-site, ready to work, at the established starting time each day. Absenteeism and

tardiness places a burden on other employees and on the Company. If you are unable to report for work for any reason, please notify your supervisor at least 1 hour prior to the regular starting time. You are responsible for speaking directly (no texting) with your supervisor about your absence. It is also your responsibility to find coverage for that shift when possible. It is not acceptable to leave a message on a supervisor's voice mail, except in extreme emergencies. In the case of leaving a voice-mail message, a follow-up call must be made later that day. If you do not report for work and the Company is not notified of your status, it will be assumed after two consecutive days of absence that you have resigned, and you will be removed from the payroll. If you become ill while at work or must leave the office for some other reason before the end of the workday, be sure to inform your supervisor of the situation and check out with the manager.

Should undue tardiness or excessive absenteeism become apparent, disciplinary action may be required. If you need a temporary change to your normal work schedule, notify your supervisor at least seven working days in advance. Each request for special work hours will be considered separately, in light of the employee's needs and the needs of the Company. Such requests may or may not be granted.

4.2 Sick Leave

ATG affords employees paid sick leave in accordance with the Massachusetts Sick Leave law. All employees earn paid sick leave at a rate of one hour of paid leave for every 30 hours worked, up to a maximum of 40 hours per calendar year. Sick time is given immediately, but can only be taken after the employee has been employed for at least 90 calendar days.

Employees will be allowed to carry over up to 40 hours of unused sick time to the next calendar year, but may not use more than 40 hours in a calendar year.

Sick time may be used by employees when they are ill, injured or need to tend to a medical condition, to attend routine medical appointments or to address the effects of domestic violence. Employees also may take leave when they need to care for or attend the routine medical appointments of a spouse, child, parent or parent of a spouse or to address the effects of domestic violence on the employee's child.

In qualifying circumstances, paid sick leave will run concurrent with any time off available under other statutory leave entitlements. Paid sick leave may not be used to extend other available time off. However, sick leave payments will be reduced by the amount of payments received from other sources relating to the illness or accident, i.e., worker's compensation and/or weekly insurance payments.

As set forth above, employees must contact their supervisor on every day they cannot report to work prior to the start of their regular work day. If leave is foreseeable (i.e., in the event of a scheduled doctor's appointment), employees must provide 7-days advance notice of their intended leave, or as much notice as is reasonably practicable under the circumstances. For absences (i) in excess of three consecutive scheduled work days, (ii) within two weeks prior to an

employee's final scheduled day of work before termination of employment, or (iii) after four unforeseeable and undocumented absences within a three-month period, ATG reserves the right to request a written certification indicating that the use of earned sick time was for an authorized purpose. If the employee fails to comply without reasonable justification with ATG's request for documentation, ATG further reserves the right to recoup the sum(s) paid for earned sick time from future pay and also to deny the future use of an equivalent number of hours of accrued sick time until documentation is provided.

Employees will not be paid for unused sick time at calendar year end, or upon termination.

ATG's policy with respect to attendance and absenteeism applies. In addition, violations of this policy may result in discipline, up to and including termination.

4.3 Harassment, Including Sexual Harassment

The Company is an Equal Opportunity Employer. It is the Company's policy to select the best candidate for each position to be filled without regard to race, color, religion, national origin, sex, sexual orientation, age, pregnancy, physical or mental disability, military or veteran status, genetic information, gender identity or expression or any other basis protected by law.

ANTI-HARASSMENT POLICY

Introduction

It is the goal of the Company to promote a workplace that is free of harassment. 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 this organization. Further, any retaliation against an individual who has complained about harassment or retaliation against individuals for cooperating with an investigation of a harassment complaint is similarly unlawful and will not be tolerated. To achieve our goal of providing a workplace free from harassment, the conduct that is described in this policy will not be tolerated and we have provided a procedure by which inappropriate conduct will be dealt with, if encountered by employees.

The Company will not tolerate any instances of unlawful harassment, including sexual harassment, by an employee, manager, or other person with whom an employee comes in contact with because of his/her job.

Because the Company takes allegations of harassment seriously, we will respond promptly to complaints of 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 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 harassment.

Definitions

Sexual Harassment

Sexual harassment is defined as sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature when:

- submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or as a basis for employment decisions; or,
- 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 supervisor 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 work place 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;
- Displaying sexually suggestive objects, pictures, cartoons;
- Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments;
- Inquiries into one's sexual experiences; and,
- Discussion of one's sexual activities.

Discriminatory Harassment

Harassment on the basis of any other protected characteristic is also strictly prohibited. Under this policy, harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race, color, religion, national origin, ancestry, sex, age, pregnancy, physical or mental disability, military or veteran status, sexual orientation, genetic information, gender identity or expression any other basis protected by law and that:

- Has the purpose or effect of creating an intimidating, hostile or offensive work environment;
- Has the purpose or effect of unreasonably interfering with an individual's work performance; or
- Otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes, but is not limited to: epithets, slurs or negative stereotyping, threatening, intimidating or hostile acts, denigrating jokes and display or circulation in the workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group (including through email).

Retaliation

All employees should take special note that retaliation against an individual who has made a good faith complaint about harassment, and retaliation against individuals for cooperating with an investigation of a harassment complaint, is unlawful and will not be tolerated by this organization.

Complaints of Harassment

If you believe that you have been subject to harassment by a co-worker, supervisor, client or vendor or by anyone else during the course of our employment, please report your concerns immediately to your supervisor or Director of Security. [Is this title still accurate? Can we identify someone more specifically? Share any contact information?] This may be done in writing or orally.

Investigation

When we receive the complaint, we will promptly investigate the allegation in a fair and expeditious manner. The investigation will be conducted in such a way as to maintain confidentiality to the extent practicable 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 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 of 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, you can obtain additional information about your rights under the laws prohibiting workplace harassment from the following government agencies:

Equal Employment Opportunity Commission, Area Office
John F. Kennedy Federal Building,
475 Government Center
Boston, MA 02203
800-669-4000

Massachusetts Commission Against Discrimination (MCAD)
Boston Office:
One Ashburton Place, 6th Floor
Boston, MA 02108
617-994-6000

4.4 Telephone Use

ATG telephones are intended for the use of serving our patients in the course of conducting the Company's business. Personal usage during business hours is not allowed except for emergencies. If an employee is found to be deviating from this policy, he/she will be subject to disciplinary action (see Section 3.12, Corrective Action).

4.5 Public Image

A professional appearance is important anytime that you come in contact with patients or potential patients. Employees should be well groomed and dressed appropriately for our business and for their position in particular.

4.6 Substance Abuse

The Company is committed to providing a safe and productive workplace for its employees. In keeping with this commitment, the following rules regarding alcohol and drugs of abuse have been established for all staff members, regardless of rank or position, including both regular and temporary employees. The rules apply during working hours to all employees of the Company while they are on Company premises or elsewhere on Company business.

So that there is no question about what these rules signify, please note the following definitions:

Company property: All Company owned or leased property used by employees.

Controlled substance of abuse: Any substance listed in Schedules I-V of Section 202 of the Controlled Substance Act, as amended.

Drug: Any chemical substance that produces physical, mental, emotional, or behavioral change in the user.

Drug paraphernalia: Equipment, a product, or material that is used or intended for use in concealing an illegal drug, or otherwise introducing into the human body an illegal drug or controlled substance. Illegal drug:

- a. Any drug or derivative thereof whose use, possession, sale, transfer, attempted sale or transfer, manufacture, or storage is illegal or regulated under any federal, state, or local law or regulation.
- b. Any drug, including – but not limited to – a prescription drug, used for any reason other than that prescribed by a physician.
- c. Inhalants used illegally.

Under the influence: A state of not having the normal use of mental or physical faculties resulting from the voluntary introduction into the body of an alcoholic beverage, drug, or substance of abuse.

Employee Alcohol and Drug Policy: The foundation of our business practices is the establishment of a "zero tolerance policy" with regard to alcohol and drug use in the work place. Any employee found to have violated this policy, will be immediately terminated.

Being under the influence of illegal drugs, alcohol, or any controlled substances on Company property is prohibited. Working while under the influence of prescription drugs that impair performance is prohibited.

The causes for termination shall include but not be limited to the following activities:

- The use, possession, solicitation or sale of narcotics, other illegal drugs or prescription medication without an authorized prescription on Cultivation or Dispensary premises or while performing job duties.
- Conviction of a crime directly related to the possession, sale or distribution of narcotics, other illegal drugs or unauthorized prescription drugs.
- The presence of any detectable amount of prohibited substances in the employee's system while at work, while on the premises of the Company, or representing the Company in any business-related capacity. "Prohibited substances" include illegal drugs, alcohol, or prescription drugs not taken in accordance with an authorized medical prescription given to the employee.

The Company may conduct drug and/or alcohol tests in accordance with any or all of the following procedures at the discretion of the Executive Management Team and in accordance with applicable law:

- **RANDOM TESTING:** Employees may be selected for drug and/or alcohol testing at any time during their employment with ATG.
- **REASONABLE SUSPICION/FOR-CAUSE TESTING:** ATG may ask an employee to submit to a drug and/or alcohol test at any time it reasonably suspects that the employee may be under the influence of drugs or alcohol, including, but not limited to, the following circumstances: evidence of drugs or alcohol on or about the employee's person or in the employee's vicinity, unusual conduct on the employee's part that suggests impairment or influence of drugs or alcohol, negative performance patterns, or excessive and unexplained absenteeism or tardiness.
- **POST-ACCIDENT TESTING:** Any employee involved in an on-the-job accident or injury under circumstances that suggest possible use or influence of drugs or alcohol in the accident or injury event may be asked to submit to a drug and/or alcohol test. "Involved in an on-the- job accident or injury" means not only the one who was or could have been injured, but also any employee who potentially contributed to the accident or injury event in any way.
- If an employee is tested for drugs or alcohol outside of the employment context and the results indicate a violation of this policy, or if an employee refuses a request to submit to testing under this policy, the employee may be subject to appropriate disciplinary action, up to and including discharge from employment. In such a case, the employee will be given an opportunity to explain the circumstances prior to any final employment action becoming effective.

Consistent with the rules listed above, any of the following actions constitutes a violation of the Company's policy on drugs and may subject an employee to disciplinary action, up to and including immediate termination. Using, selling, purchasing, transferring, manufacturing, or storing an illegal drug or drug paraphernalia, or attempting to or assisting another to do so, while in the course of employment. Working or reporting to work, conducting Company business or being on Company property while under the influence of an illegal drug or alcohol, or in an impaired condition.

4.7 Tobacco Products

The use of tobacco products is not permitted anywhere on the Company's premises.

4.8 Internet Use

ATG employees are allowed use of the Internet and e-mail when necessary to serve our clients and conduct the Company's business. Employees may use the Internet when appropriate to access information needed to conduct business of the Company. Employees may use e-mail when appropriate for Company business correspondence. Use of the Internet must not disrupt operation of the company computer network. Use of the Internet must not interfere with an

employee's productivity. Employees are responsible for using the Internet in a manner that is ethical and lawful. Internet messages are public and not private. ATG reserves the right to access and monitor all files and messages on its systems.

4.9 Social Media

Because of the sensitive nature of our work, ATG employees, unless hired to do so, are prohibited from referring to, mentioning, and/or discussing ATG's business operations on any form of social media. However, this restriction is not intended to prevent employees from engaging in collective activity in connection with their working conditions.

4.10 Dress Code Policy: Business Casual

ATG expects employees to dress appropriately in Business Casual attire. Because our work environment serves customers, business casual attire is essential.

Examples of Business Casual Attire:

- Polo or golf shirts, Oxford shirts, sweaters, knit tops, short-sleeved blouses or shirts, turtlenecks, company logo wear
- Khaki, corduroy, twill pants, capri pants
- Jeans (must be clean and free of rips, tears and fraying; may not be excessively tight or revealing)

All clothes must project professionalism. Clothes that are too revealing or inappropriate are not allowed.

Restrictions: Open toe footwear such as sandals and flip flops. No sweatpants, yoga pants, spandex and shorts. Revealing clothing such as short shirts, strapless attire, spaghetti straps, and midriff shirts are prohibited.

Employees are expected to demonstrate good judgement and professional taste. Any staff member who does not meet the attire or grooming standards will be subject to corrective action and may be asked to leave the premises to change clothing by his/her supervisor or by the Human Resources Manager.

Reasonable accommodation of religious beliefs

ATG recognizes the importance of individually held religious beliefs to persons within its workforce. ATG will reasonably accommodate a staff member's religious beliefs in terms of workplace attire unless the accommodation creates an undue hardship. Those requesting a workplace attire accommodation based on religious beliefs should be referred to the Human Resources Manager.

Section 5: Wage and Salary Policies

5.1 Wage or Salary Increases

Each employee's hourly wage or annual salary will be reviewed at least once each year. The employee's review date will usually be conducted on or about the anniversary date of employment or the date of the previous compensation review. Such reviews may be conducted more frequently for a newly created position, or based on a recent promotion. Increases will be determined on the basis of individual and company performance, adherence to company policies and procedures, and ability to meet or exceed duties per job description and achieve performance goals (see Section 3.10, Performance Review/Planning Sessions). Although the Company's salary ranges and hourly wage schedules will be adjusted on an ongoing basis, ATG does not grant "cost of living" increases. Individual and company performance is the key to wage increases in the Company.

5.2 Timekeeping

Accurately recording time worked is the responsibility of every non-exempt employee. As such, non-exempt employees are required to submit complete and accurate time sheets on a weekly basis. Time worked is the time actually spent on a job(s) performing assigned duties. ATG does not pay for lunch or other extended breaks or time spent on personal matters. Altering, falsifying, tampering with time records, or recording time on another team member's time record will result in disciplinary action, up to and including termination of employment. Authorized personnel will review time records each week. Any changes to an employee's time record must be approved by his/her supervisor. Questions regarding the timekeeping system or time cards should be directed to the manager.

5.3 Overtime

Overtime compensation is paid to non-exempt employees in accordance with federal and state wage and hour laws. Overtime is payable for all hours worked over 40 per week at a rate of one and one-half times the non-exempt employee's regular hourly rate. Time off taken for sick leave or vacation, holidays or any leave of absence will not be considered hours worked when calculating overtime. All overtime work performed by a non-exempt employee must receive the supervisor's prior authorization. Overtime worked without prior authorization from the supervisor may result in disciplinary action. The supervisor's signature on a timesheet authorizes pay for overtime hours worked.

5.4 Paydays

All employees are paid bi-weekly. Paychecks will be deposited directly into an employee's bank account or physically mailed to the employee's home address. In the event that a regularly scheduled payday falls on a weekend or holiday, employees will receive pay on the day prior. Paychecks will not, under any circumstances, be drafted or deposited to any person other than the employee.

5.5 Bereavement

All employees are eligible for three bereavement days. However, the deceased must be an immediate family member. Only employees with full-time status are eligible for paid bereavement leave. Part-time employees may take unpaid bereavement leave.

Section 6: Benefits and Services

ATG offers a benefits program for its regular full-time and regular part-time employees. However, the existence of these programs does not signify that an employee will necessarily be employed for the required time necessary to qualify for the benefits included in and administered through these programs.

6.1 Group Insurance

ATG currently offers the following health and life insurance programs for all regular employees who work at least 30-hours per week (as determined by the carrier of the policies):

Health and Dental Insurance

- Eligibility for coverage begins 90 days after regular employment commences.
- The company pays 70% of the monthly premium.
- The employee pays the 30% remainder of the premium.
- The employee premium is paid through payroll deduction.
- Active health/dental benefits cease as of last day of employment

6.2 COBRA Benefits

The Federal Consolidated Budget Reconciliation Act (COBRA) gives employees and their qualified beneficiaries the opportunity to continue health insurance coverage under the ATG health plan when a “qualifying event” would normally result in the loss of eligibility. Some common qualifying events are resignation, termination of employment, or death of an employee; a reduction in an employee’s hours or leave of absence, divorce or legal separation and a dependent child no longer meeting eligibility requirements. Please let Human Resources know if you have a qualifying event that results in a loss of eligibility so that you or a qualified beneficiary may continue your health care coverage.

Under COBRA, the employee or beneficiary pays the full cost of coverage at ATG group rates plus an administration fee. ATG provides each eligible employee with a written notice describing rights granted under COBRA when the employee becomes eligible for coverage under ATG’s health insurance plan. The notice contains important information about the employee’s rights and obligations.

6.3 Social Security/Medicare

ATG withholds income tax from all employees' earnings and participates in FICA (Social Security) and Medicare withholding and matching programs as required by law.

6.4 Vacation

Paid vacation is available to regular full-time employees only. Paid vacation time accrues monthly, in arrears, in equal installments using the formula outlined in each employee's offer letter. Earned vacation leave cannot be taken before it is accrued and approved. Vacation may be taken in half-day increments of time. Upon termination, unused earned vacation will be paid in a lump sum in the employee's final paycheck. One week paid vacation may be carried over from one calendar year to the next. Any additional vacation remaining at calendar year end will be lost. The maximum amount of allowable carried over vacation time at any point in time is one week. ATG does not buy back unused vacation time. No more than one week of vacation may be taken at one time, except under extraordinary circumstances. Requests for more than one week of vacation should be in writing at least ninety days prior to the beginning of the requested vacation period. Vacation time for regular full-time employees varies based on experience level, original starting point, time with the company, etc. The table below outlines vacation eligibility levels per calendar year:

Employment Status:	Regular Part-time Level 1	Regular Full-time Level 2	Regular Full-time Level 3	Regular Full-time Level 4	Regular Full-time Level 5
Who is Eligible?	Part-time employees	Full time employees	Full time employees	Full time employees	Full time employees
Annual vacation time:	No Vacation	1 Week	2 Weeks	3 Weeks	6 Weeks
Annual vacation time after 5 years in this level:	No Vacation	2 Weeks	3 Weeks	4 Weeks	7 Weeks

6.5 Record Keeping

The Human Resources Manager maintains a record of vacation days accrued and used. Each employee is responsible for verifying his/her pay stub to make sure the correct amount of hours appear.

6.6 Holidays

ATG observes the following holidays per year for all employees: New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day. Full-time employees will receive their regular pay for a holiday, while part-time employees will not receive holiday pay. Non-exempt, hourly employees will receive premium pay for working Columbus Day and Veteran's Day, if they volunteer to do so.

6.7 Jury Witness Duty

All employees will be excused from work for the days on which they serve jury duty. All employees will be paid regular wages, less any amount received for jury duty, for the first three days of jury duty. Thereafter, all exempt employees will be paid their usual salary, less any amount received for jury duty, for any week during which they perform work for the Company whilst simultaneously serving on a jury. Employees must provide immediate notice to their supervisor upon receipt of the jury duty summons or subpoena and must provide their supervisor a copy of the summons or subpoena. Jury duty pay for non-exempt employees will be calculated on the employee's base rate times the number of hours the employee would otherwise have worked on the day of absence.

Employees also will be excused from work if they are subpoenaed to testify. Unless a non-exempt employee elects to use vacation, the time will be without pay. Exempt employees will be paid in accordance with wage and hour laws.

Employees are expected to report to work whenever the jury or testimony schedules permit.

6.8 Military Leave

ATG will provide a leave of absence for military commitments as required by federal and state law. Military leave includes active duty and active or inactive duty training, including annual reserve training duty and National Guard training. Please notify ATG of the need for military leave as soon as you are made aware of it. A copy of the military service orders is requested. You must also notify ATG of a return-to-work date as soon as you receive such notification from your military unit.

6.9 Parental Leave

A parental leave of absence up to a maximum of eight (8) weeks will be granted to full-time male and female employees who wish to return to ATG after the employee gives birth (or his or her spouse gives birth) or for the placement, or adoption with the employee adopting, or intending to adopt, a child under the age of 18, or under the age of 23 if the child is mentally or physically disabled, if the employee complies with the following conditions:

- The employee has completed three (3) consecutive months of employment.
- The employee has given two (2) weeks' notice of the employee's expected departure date and notice that the employee intends to return to work. This notice should be in writing and submitted to the employee's supervisor or Director of Operations who in turn will submit this document to be included in the employee's permanent file.
- Any two (2) employees shall only be entitled to eight (8) weeks of parental leave in the aggregate for the birth or adoption of the same child.

The employee is entitled to return to the same or similar full-time position at the same rate of pay the employee received prior to the parental leave without loss of benefits for which the employee was eligible on the date the employee's leave commenced if the employee terminates parental leave within eight weeks and if other employees of equal length of service credit and

status in the same or similar position have not been laid off due to economic conditions or other changes in operating conditions affecting employment during the period of such maternity leave. Employees may use sick and vacation leave concurrently with this leave. Parental Leave also will run concurrent with any available Family and Medical Leave Act leave.

Parental leave shall not affect the employee's right to receive vacation time, sick leave, bonuses, advancement, seniority, length of service credit, benefits, plans or programs for which the employee was eligible at the date of the leave, and any other advantages or rights of employment incidental to the employment position; provided, however, that the parental leave shall not be included, when applicable, in the computation of the benefits, rights and advantages. ATG will continue to pay its portion of the employee's health insurance premiums during such a leave.

6.10 Domestic Violence Leave –

Employees may take up to 15 days of unpaid leave in any 12-month period if the employee or a family member is a victim of abusive behavior and the leave is used to:

- seek or obtain counseling, victim services, medical attention, or legal assistance;
- secure housing;
- obtain a protective order from a court;
- appear before a grand jury or in court;
- meet with a district attorney or other law enforcement official;
- attend child custody proceedings; or
- address other issues directly related to the abusive behavior against the employee or a family member.

Any employee requesting leave under this Policy shall first exhaust all vacation leave, personal leave and sick leave available prior to requesting or taking domestic violence leave. Where leave is foreseeable (for example, a scheduled court date), the employee must provide at least 30 days advance notice prior to the anticipated leave date, or as much notice as it practicable under the circumstances. If there is a threat of imminent danger to the health or safety of an employee or the employee's family member, the employee shall not be required to provide advanced notice of leave: provided, however, that the employee shall notify ATG within 3 workdays that leave was taken or is being taken under this policy.

ATG may require an employee to provide documentation evidencing that the employee or family member has been a victim of abusive behavior and that the leave taken is consistent with this Policy. All information related to an employee's leave under this policy shall be kept confidential and shall not be disclosed except to the extent such disclosure is permitted by applicable law.

ATG will not retaliate or in any other manner discriminate against an employee for exercising his or her rights to take leave under this policy.

6.11 Small Necessities Leave

Employees employed for at least one year who have worked at least 1,250 hours in the 12 months immediately before the start of leave are eligible for up to 24 hours of unpaid leave during any 12-month period to:

- Participate in school activities directly related to the educational advancement of his child, including parent-teacher conferences or interviewing for a new school.
- Accompany his child to routine medical or dental appointments, including check-ups or vaccinations.
- Accompany an elderly relative to routine medical, dental, or other appointments related to the relative's care, including interviewing at nursing or group homes.

The time off will run concurrent with available leave and benefits policies to the extent permitted by applicable law.

6.12 Family Medical Leave Act

Employees employed for at least one year who have worked at least 1,250 hours in the 12 months immediately before the start of leave, and who work at a worksite where there are at least 50 employees in a 75-mile radius, are eligible for:

- Twelve workweeks of unpaid leave in a 12-month period for:
 - the birth of a child and to care for the newborn child within one year of birth;
 - the placement with the employee of a child for adoption or foster care and to care for the newly placed child within one year of placement;
 - to care for the employee's spouse, child, or parent who has a serious health condition;
 - a serious health condition that makes the employee unable to perform the essential functions of his or her job;
 - any qualifying exigency arising out of the fact that the employee's spouse, son, daughter, or parent is a covered military member on "covered active duty;" **or**
- Twenty-six workweeks of leave during a single 12-month period to care for a covered servicemember with a serious injury or illness if the eligible employee is the servicemember's spouse, son, daughter, parent, or next of kin (military caregiver leave).

If you and your spouse both work for ATG, the two of you will be entitled to a combined total of 12 weeks of leave to care for a newborn, newly adopted child, or recently placed foster child, and to care for a parent with a serious health condition. If you both qualify for the 26-week leave permitted to care for a covered service member, you will be entitled to a combined total of 26 weeks of leave for this purpose.

Employees must request a planned family and medical leave at least 30 days before the leave begins. If the need for the leave is not foreseeable, employees must request the leave as soon as he or she becomes aware of the need for leave. Failure to comply with this requirement may result in a delay of the start of the leave.

When leave is requested for medical reasons, the employee must submit a medical certification from the health care provider that establishes the employee is eligible for family and medical leave. The certification must be provided as soon as is reasonably practical, and not later than the date leave begins or within 15 days of ATG's request, whichever is later. When the leave is requested because of the employee's own serious health condition, the certification must include: (1) the date the serious health condition commenced, (2) the probable duration of the serious health condition, and (3) a statement that, because of the serious health condition, the employee is unable to work or needs medical treatment.

When leave is requested to care for a family member who is ill or injured, the certification must contain: (1) verification the family member has a serious health condition or serious injury or illness, as defined above, and the date such condition began, (2) the probable duration of the condition, (3) an estimate of the amount of time the health care provider believes the employee will be needed to care for the family member or covered service member, and (4) a statement that the condition warrants the participation of the employee to provide care. ATG reserves the right to contact the health care provider to seek clarification of information in the certification, as needed, and may require recertification, as appropriate.

Before returning to work at the conclusion of a leave due to the employee's own serious health condition, the employee is required to provide a certification from his or her health care provider regarding the employee's fitness for duty. The employee must provide the required medical certification to ATG in a timely manner to avoid a delay or denial of leave.

The designated 12-month period during which leave may be taken will be calculated based on a rolling 12-month period, measured backward from the date of any FMLA leave is taken. All time off that qualifies as family and medical leave will be counted against the employees federal and, if applicable, state family and medical leave entitlement to the fullest extent permitted by law. Accrued sick and vacation time must be used concurrent with FMLA leave.

During a family and medical leave, group benefits will be maintained for up to 12 workweeks (or up to 26 weeks when leave is for the purpose of caring for a covered service member), as if the employee was continuously employed.

If the employee does not return to work on the first workday following the expiration of an approved family and medical leave, the employee will be deemed to have resigned from his or her employment. Upon returning from such a leave the employee will normally be reinstated to his or her original or an equivalent position and will receive pay and benefits equivalent to those the employee received prior to the leave, as required by law. In certain circumstances, "key" employees may not be eligible for reinstatement following a family and medical leave. ATG will provide written notice to any "key" employee who is not eligible for reinstatement.

6.13 Employee Discount

ATG employees who also happen to be duly registered and certified Medical Use of Marijuana patients in Massachusetts are entitled to a 40% discount off of full price medicine. The employee

discount applies to purchases of dried flower, edibles, topicals, and concentrates. The discount does not apply to non-medicine (i.e., Paraphernalia, batteries, etc.).

6.14 Fairness to Pregnant Workers

Under the Massachusetts Pregnant Workers Fairness Act, employees have the right to be free from discrimination in relation to pregnancy or a condition related to the employee's pregnancy including, but not limited to, lactation or the need to express breast milk for a nursing child. The right to be free from such discrimination includes the right to reasonable accommodations for conditions related to pregnancy.

ATG shall provide a reasonable accommodation for an employee's pregnancy or any condition related to the employee's pregnancy (which includes, but is not limited to, lactation or the need to express breast milk for a nursing child) to enable the employee to perform the essential functions of the employee's job, unless the requested accommodation would impose an undue hardship to ATG. A reasonable accommodation may include, among other things: (1) more frequent or longer paid or unpaid breaks; (2) time off to attend to a pregnancy complication or recover from childbirth with or without pay; (3) acquisition or modification of equipment or seating; (4) temporary transfer to a less strenuous or hazardous position; (5) job restructuring; (6) light duty; (7) private non-bathroom space for expressing breast milk; (8) assistance with manual labor; or (9) a modified work schedule.

Employees seeking pregnancy-related accommodations should make a request to Human Resources. After the employee has requested an accommodation, ATG and the employee will engage in an interactive process to determine the feasibility of a requested accommodation. During the interactive process, the Company may require documentation about the need for a reasonable accommodation from an appropriate health care or rehabilitation professional unless the employee has requested more frequent restroom, food or water breaks, seating, limits on lifting over twenty (20) pounds, or a private non-bathroom space for expressing breast milk. ATG may also require documentation when an employee seeks an extension of the accommodation beyond the originally extended accommodation.

In determining whether an accommodation constitutes an undue hardship, ATG will consider the nature and cost of the needed accommodation, the overall financial resources of ATG, the overall size of the business of ATG with respect to the number of employees and the number, type and location of its facilities, and the effect on expenses and resources or any other impact of the accommodation on ATG's business.

ATG will not:

- take an adverse action against an employee that requests or uses a reasonable accommodation;
- deny an employment opportunity to an employee because of the Company's need to provide the employee a reasonable accommodation based on a known condition related to the employee's pregnancy;

- require an employee to accept an accommodation the employee chooses not to accept where the accommodation is not necessary to enable the employee to perform the essential functions of the job;
- demand that an employee take a leave of absence if another reasonable accommodation would suffice and would not pose an undue hardship to ATG; or
- refuse to hire a person who is pregnant because of the person's pregnancy or condition related to pregnancy where the person can perform the essential functions of the position with a reasonable accommodation that would not impose an undue hardship to ATG.

Section 7: Employee Communications

7.1 Staff Meetings

Quarterly staff meetings will be held on the first Monday of each quarter. These informative meetings allow employees to be informed on recent company activities, changes in the workplace and employee recognition. All staff are expected to attend such meetings unless specifically excused from doing so.

7.2 Bulletin Boards

Bulletin boards placed in designated areas provide employees access to important posted information and announcements. The employee is responsible for reading necessary information posted on the bulletin boards.

Section 8: Employee Sign-off

Please sign below evidencing that you have received, read, and fully understand ATG's Employee Manual.

Employee Name (Print)

Date

Employee Signature

Personnel

Dispensary Agent Training

At Hiring:

- New dispensary agents must complete an initial training regimen prior to performing actual job functions.
- Training will entail shadowing a dispensary agent in a similar role with similar responsibilities as the new dispensary agent
- Training must also include training on confidentiality (patient and employee), as well as in-depth review of the Medical Use of Marijuana and Adult-Use program regulations.
- Incident de-escalation techniques and emergency procedures.
- Documentation of all required training, including training regarding privacy and confidentiality requirements, and a signed statement of the individual hired indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters. This must be included in employee's personnel file.

On-going:

- At a minimum, staff shall receive a minimum of 8 hours on-going, relevant training and/or supplemental education annually
- The Director of Operations and the Human Resource Manager will determine the annual training agendas for both dispensary and cultivation staff.

Personnel Records

Records must be available for inspection by the DPH/CNB, upon request. Personnel records must include:

1. Job descriptions for each employee and volunteer position
2. Organizational charts consistent with the job descriptions;
3. All materials submitted to the Department/Commission pursuant to 105 CMR 725.030(B);
 - a. The full name, date of birth, and address of the individual;
 - b. Written acknowledgement by the individual of the limitations on his or her authorization to cultivate, harvest, prepare, package, possess, transport, and dispense marijuana for medical purposes in the Commonwealth;
 - c. A copy of the dispensary agent's driver's license, government-issued identification card, or other verifiable identity document acceptable to the Department/Commission;
 - d. An attestation that the individual will not engage in the diversion of marijuana;
 - e. Any other information required by the Department/Commission.
4. Documentation of verification of references;
5. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
6. 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 presenters;

7. A copy of the application that the RMD submitted to the Department/Commission on behalf of any prospective dispensary agent;
8. A copy of the background check report commissioned by ATG prior to hire;
9. Documentation of periodic performance evaluations;
10. A record of any disciplinary action taken

Personnel records contain PII and other confidential information. Therefore, these records shall be pass-protected as appropriate and stored in ATG's electronic file share system with access permissions restricted to the Executive Management Team only. Personnel records for each dispensary agent must be maintained for at least 12 months after termination of the individual's affiliation with ATG

Staffing plan and records in compliance with 105 CMR 725.105(A)(8) and 725.105(I)(4)(c).

ATG recruits new employees through:

- Traditional job opportunity websites including Indeed.com
- Job Fairs hosted in disproportionate impacted areas.
- Word-of-mouth advertising.
- Posting on our website (www.atgma.org)
- Review of unsolicited job applications received prior to posting the opportunity
- Additional channels TBD, if volume and quality of response requires it

Policy, as required under 105 CMR 725.105(A)(15), for the immediate dismissal of any dispensary agent who has:

- a. Diverted marijuana, which shall be reported to law enforcement officials and to the Department; or
- b. Engaged in unsafe practices with regard to operation of the RMD, which shall be reported to the Department.

Any dispensary agent found to have diverted marijuana or engaged in unsafe practices with regard to the operations of ATG will be subject to immediate dismissal per his or her employment contract and State regulations.

A member of ATG's Executive Management Team will report any and all instances of diversion to law enforcement officials and to the DPH/CNB.

Any instance of an ATG employee engaging in unsafe practices with regard to the operations of ATG will also be reported to the DPH/CNB by a member of the Executive Management Team.

Alternative Therapies Group, Inc. has adopted a zero-tolerance policy toward individuals who knowingly violate the law, state marijuana regulations, or ATG company policy.

Separating recreational from medical operations

Description of proposed operations

At the Point-of-Sale, we do propose to commence dispensing of marijuana products to adults 21 and over, in addition to our current medical-only dispensary operations. The addition of adult-use marijuana dispensing will not commence without receipt of all necessary state and local approvals, including a special permit, and an adult-use retail license (issued by the Massachusetts Cannabis Control Commission).

Distribution practices

Under the medical program, marijuana may only be dispensed to qualifying patients with a valid CCC patient registration and doctor certification, and only when the patient has not already reached their 60-day purchase limit. Each patient is required to present their CCC patient registration card and official MA identification card for a cursory review by a security guard before being allowed to enter the facility. The patient registration is then verified in the CCC patient registration database. Provided that the patient is current and has not exceeded their limit, they can pass through our security screening area and to make a purchase. First time patients will be provided with educational material which contains an acknowledgement of state law, regulations, and our facility rules. The provided material will also contain an attestation that they are not allowed to divert medicine to anyone, and if found in violation could face the possibility of up to 5 years in prison

Patient purchase limits are enforced by our Point-of-Sale system, which prevents our staff from dispensing an amount which would put the patient over their 60-day limit, based on their purchase history over the preceding 60 days.

Under the adult-use marijuana regulations, any adult 21 and over will be allowed into the facility. The procedures for entry will include the same cursory ID review by a security guard before allowing a customer into the facility. Once inside, ID scanning technology will then be used to verify that each state-issued ID card is legitimate before the customer is allowed to proceed to the security screening area. A purchase limit will be enforced based on statutory possession limits and state regulations, which currently sets the limit at 1 ounce or 5 grams of concentrate or MIPs (Marijuana Infused Products). Adult-use customers will be limited to purchasing up to these statutory limits each day.

ATG has a comprehensive plan to enable the sale of both medical and adult-use marijuana at their Salem, MA dispensary location. This plan includes both physical and virtual separation.

Physical Separation at the Dispensary:

- Physical separation at the dispensary begins when an individual enters the building.

- If the individual is visiting the dispensary for medical, they will go through the current MTC process as required by state regulations
- If the individual is visiting the dispensary for adult-use, they will go through the process to verify that they are 21 years old or older using one of the required forms of identification. These include:
 - Liquor purchase identification card
 - Motor vehicle license
 - Identification card
 - Valid passport issued by the United States government
 - Valid United States issued military identification card
- Inside the dispensary, there will be a separate sales counters for medical and adult-use customers
- A semi-private room will be available for patient/customer consultations
- Higher dosage medical products will be locked up separately from adult-use products.

Virtual Separation at the Dispensary:

- Our Point-of-Sale software provides functionality that enables virtual separation of medical and adult-use Marijuana products
- The software will be setup as two separate and distinct “Modules” which will allow for clear distinction between adult-use and medical transactions. When a staff member begins a transaction, they will select the appropriate module to begin the process. Products designated as medical-only will not be available in the adult-use module, and vice versa.

Restricting Access to age 21 and older

ATG proposes to continue cultivation and product manufacturing in its existing facility in Amesbury. Per statute and state regulations, all employees must be 21 years of age or older. Age of each prospective employee is verified using one of the state-approved forms of identification. Access to this facility is limited to staff and approved visitors whose age is verified by an authorized staff member upon entry to the facility.

According to MA adult-use marijuana regulations, any adult 21 and over may be allowed into a dispensary facility. ATG has a comprehensive plan to *plan to ensure that access to the adult-use operation is restricted to those individuals 21 years of age or older.*

- A cursory review of every customer's government-issued identification card is conducted by a security guard outside the facility entrance.
- If the individual is visiting the dispensary for adult-use, their age and authenticity of the ID card will then be verified through use of ID scanning technology. Acceptable forms of identification include the following:
 - Liquor purchase identification card
 - Motor vehicle license
 - Identification card
 - Valid passport issued by the United States government
 - Valid United States issued military identification card

Quality control and testing

ATG's existing procedures for ensuring high-quality, dose-consistent, contaminant-free medical marijuana products are built upon cultivation and MIPs production practices which expressly prohibit the use of plant-growth regulators, non-organic pesticides and heavy-metal additives, while also demanding high standards of sanitization and third-party laboratory testing.

These procedures begin with strict sanitary protocols and personal hygiene requirements for all cultivation and manufacturing staff. These include, but are not limited to: depositing of non-essential personal belongings in sequestered locker rooms upon first entering the facility; sanitary uniforms for all employees/authorized visitors; and, before entering any cultivation or production area, mandated use of secondary locker/changing rooms and further changing into fresh clothing, a face mask, and a hair-net.

Marijuana products are regularly tested at an ISO certified state-compliant lab. Testing is conducted under Good Laboratory Practices (GLP) guidelines and ISO 17025 certification, consistent with 935 CMR 501.052. Our third-party lab vendors are registered as dispensary agents with the Department of Public Health. Our lab vendors are responsible for transportation of samples to be tested. All excess Marijuana and Marijuana Products must be disposed of in compliance with 935 CMR 501.105(12), by the Independent Testing Laboratory directly.

Product testing objectives include both qualifying and quantifying the potential medicinal benefits. This includes evaluating cannabinoid and terpene profiles, both of which have been anecdotally reported to have patient treatment outcome value. Cannabinoid profiles include identification and quantification of the predominant compounds present in a sample, and may include THC, CBD, CBN, CBG, CBC, and the acid forms of each of these (THCA, CBDA, CBNA, CBGA, and CBCA). Terpenoid profiles include the most abundant terpenes present and may include myrcene, limonene, linalool, alpha-pinene and trans-caryophyllene in addition to others.

In addition, all cannabis products are tested for the presence of pesticides and micro-organisms, including bacteria and mold, which may present a health risk to patients, many of which may be immune compromised with increased sensitivity to these toxic components. Molds such as *Aspergillus*, *Penicillium* and *Cladosporium* can be found in almost all marijuana plant material, but testing ensures that levels of mold and mycotoxins are below acceptable limits as determined by state regulations. Real time PCR (qPCR) is generally used by our lab vendors to identify and quantify any micro-organisms present in a sample, while additional chromatographic techniques, in combination with monoclonal antibody-based ImmunoAffinity assays, are used to detect the presence and levels of mycotoxins in a sample. Similar chromatographic methodologies are used for the identification of plant growth regulators in our products.

Samples are tested for the presence of heavy metals using ICP-MS. For samples of flower, residual moisture content is measured; for cannabis extracts, residual solvents are measured. The only solvent currently used by ATG is ethanol.

Any marijuana plant material or finished product, along with its associated batch in which contaminants are found to be present, shall be disposed of in a compliant manner.

We intend to strictly adhere to all testing protocols as determined by the Cannabis Control Commission.

Testing results are currently retained for no less than 1 year.

Quality Control (QC) Samples

Duplicate samples are routinely collected to provide verification of both sampling and laboratory procedures and consistency. Specifically, a duplicate is collected for 5 percent (1 per 20) of the samples collected for each marijuana product type. Duplicate samples are not identified to the receiving laboratory (this is considered blind quality control). Duplicate samples are used to evaluate any variance in the sampling and analysis procedures.

“Duplicate Samples” means two samples taken from, and representative of, the same material that are carried through all steps of the sampling and analytical procedures in an identical manner. Duplicate samples may be used to evaluate variance in the evaluation method, including sampling and analysis.

Procedures for sampling of finished product:

This section describes sample collection procedures that are generally applicable to any medical marijuana product that ATG may dispense, including, but not limited to, finished plant material; liquid concentrates or MIPs; resins, waxes, creams, or other semi-solid products; or solid concentrates or MIPs. Because of the wide range of medical marijuana products that ATG may offer, particularly MIPs, these sample collection procedures may require adaptation in some cases. In all cases, sample collection must be conducted in a manner that provides analytically sound and representative samples so that all medical marijuana products dispensed are safe, effective, and accurately labeled. The RMD must document every sampling event and provide this documentation to the Commission upon request.

Prior to Sample Collection. The ATG dispensary agents conducting the sampling should assemble all equipment and information needed before beginning. Items to assemble before sampling include, but are not limited to, the following:

- Sample collection plan for each product type;
- Logbook or sample collection forms;
- Chain-of-custody forms (COCs);
- Disposable gloves;
- Decontaminated tool(s), such as a spatula, knife, sampling spear, or pipette;
- Stainless steel bowl and implement to homogenize the product (e.g., by stirring, chopping, or grinding);
- Clean, decontaminated surface for sample processing;
- Sample containers appropriate for the analyses required;
- Container labels and pen with indelible ink;
- Supplies to thoroughly clean, decontaminate and dry sampling equipment between samples; and
- A cooler with ice to keep samples cool until refrigeration or shipment to the laboratory (applies to perishable products only).

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 and start time, participating personnel, a general description of the product type and batch number sampled, a description of the sampling procedures used, and 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 of the testing protocols document, 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.

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. Collect the planned samples from each cultivation or production batch one at a time. Follow these basic steps for each sample:

1. Wear disposable gloves, hair net and face mask to mitigate potential for contamination of samples.
2. Ensure that the sampling area is clean and decontaminated, and lay out any tools and equipment needed.
3. 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.
4. 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.
5. 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.
6. 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 with isopropyl alcohol before collecting the next sample.
7. 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.

8. To preserve the chemical and biological composition of the samples, they should be refrigerated or maintained on ice until shipped to the analytical laboratory.
9. Chain-of-custody paperwork should be completed immediately prior to shipment to the analytical laboratory.

Medical 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. A grinding device that minimizes loss (e.g., leaching of resins) should be used, and the grinding device should be cleaned thoroughly after each use.

Another method to promote the representativeness of a ground medical 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).

Resin and other solids should not be melted as a means of homogenization. Heating the product may alter the cannabinoid profile or contamination levels (WHO, 2005) thereby rendering the sample unrepresentative of the source product.

Edible products tend to be relatively homogeneous (Sexton and Ziskind, 2013), so a selection of packaged or ready-to-dispense MIPs may be provided to the analytical laboratory to represent a given production batch (Sexton and Ziskind, 2013). MIPs may be either liquid or solid, and the solid MIPs may be of varying density (e.g., baked goods, candies, etc.). Laboratory samples of MIPs shall be homogenized prior to testing such that the sample is representative of the whole product. Homogenized samples should be mixed and quartered similar to the procedure described above. If production batches of individually packaged MIPs are sampled, multiple packaged products should be sampled such that they are representative of the production batch size.

Qualifications and training

Qualifications for employment at ATG vary with the position. Here is a list of minimum qualifications as shown on our current job descriptions:

1. *CEO* - The CEO will be thoroughly committed to ATG's corporate mission. All candidates should have proven leadership, coaching, and relationship management experience. Concrete demonstrable experience and other qualifications include:
 - Unwavering commitment to quality control and data-driven operational evaluation
 - Excellence in organizational management with the ability to coach staff, manage, and develop high-performance teams, set and achieve strategic objectives, and manage a budget
 - Strong marketing, public relations, and fundraising experience with the ability to engage a wide range of stakeholders and cultures
 - Strong written and verbal communication skills; a persuasive and passionate communicator with excellent interpersonal and multidisciplinary project skills
 - Action-oriented, entrepreneurial, adaptable, and innovative approach to business planning
 - Ability to work effectively in collaboration with diverse groups of people
 - Passion, idealism, integrity, positive attitude, mission-driven, and self-directed
2. *Controller* - The Controller will have at least five to eight years of professional experience in financial services/accounting. S/he will have experience creating and driving the analytic framework for planning and managing organizational change in a highly entrepreneurial organization. The Controller will have the following experience and attributes:
 - Bachelor's degree (MA/MBA preferred) in Business, Management, or Finance.
 - Excellent people skills, with experience collaborating in a multi-disciplinary, diverse, and dynamic team.
 - Demonstrated experience in financial management and accounting, ideally in the nonprofit sector.
 - Experience should include legal, audit, compliance, budget, and resource development.
 - Demonstrated resourcefulness in setting priorities, proposing new ways of creating efficiencies, and guiding investment in people and systems.
 - Proven effectiveness leading professionals in finance and accounting.
 - Flexible and a self-starter; able to multi-task while also being highly detail-oriented.
 - Personal qualities of integrity, credibility, and a commitment to ATG's nonprofit's mission.
3. *Director of Cultivation*
 - Valid driver's license, proof of insurance, and reliable transportation
 - Must be 21 years of age
 - Extensive knowledge of horticulture and botany.
 - BS or AS in Horticulture/Floriculture/Biology or related field preferred
 - Strong interpersonal skills/team player.
 - Ability to manage time and effectively prioritize.
 - Meticulous attention to detail.
 - Must be professional and customer service oriented.

- Flexibility and ability to adapt quickly to business needs.
- Must be comfortable with a high level of responsibility.
- Must submit to a full background check.
- Have extensive horticulture and botany knowledge, as well as previous management experience.
- Excellent communication skills
- Be flexible and willing to pitch-in wherever needed
- Must be professional and customer service oriented when dealing with patients/vendors/ and staff members.

4. Director of Retail Operations

- Results-proven track record of exceeding goals and delivering desired results
- Evidence of the ability to consistently make good decisions through a combination of analysis, wisdom, experience, and judgment
- High level of business acumen including successful P&L management
- Ability to balance the delivery of programs against the realities of a budget
- Problem solving, project management, and creative resourcefulness
- Energetic, flexible, collaborative, and proactive
- A team leader who can positively and productively impact both strategic and tactical operational initiatives.
- Proven track record of success facilitating progressive organizational change and development within a growing organization
- 5+ years of relevant retail and/or operations management experience preferred
- MBA or equivalent professional experience
- MUST have a valid MA Driver's license and proof of insured reliable transportation
- Must be 21 years of age
- Punctual, meticulous, reliable

- Courteous manner with patients and staff
- Knowledge of strains and cannabis products preferred

5. *Director of Security*

- Minimum five (5) years of management experience.
- Minimum twelve (2) years of compliance-related experience.
- Bachelor's or clinical degree, OR four (4) years of experience in a directly related field.
- High School Diploma or General Education Development (GED) required.
- Knowledge of security compliance requirements and technologies.
- Expert knowledge of compliance policies, practices and systems.
- Develops advanced compliance principles, theories, and concepts.
- Knowledge of compliance-related practices and standards.
- Project management skills.

6. *Kitchen Manager*

- Must have a culinary degree or equivalent experience
- Must have a valid MA Driver's license and proof of insured reliable transportation
- Must be 21 years of age
- Punctual, meticulous, reliable
- Have knowledge of strains, genetics, edibles and growing
- Submit to a full background check
- Strong communication skills
- High level of responsibility
- Compassion for patients

7. *Production Manager*

- Must have a valid MA Driver's license and proof of insured reliable transportation
- Must be 21 years of age
- Punctual, meticulous, reliable
- Have or be willing to acquire knowledge of cannabis products and processing techniques
- Submit to a full background check
- Strong communication skills
- High level of responsibility
- Compassion for patients

8. *Dispensary Manager*

- MUST have a VALID MA Driver's license and proof of insured reliable transportation
- Must be 21 years of age
- Punctual, meticulous, reliable
- Courteous manners with patients
- Have knowledge of strains, genetics, edibles and growing.

- Good communication skills
- Responsible
- Be flexible and willing to pitch-in wherever needed
- Must be confident and customer service oriented when dealing with patients/customers on the phone and in person as well compassion for whomever we serve

9. *Assistant Manager (Retail)*

- Must have a valid MA Driver's license and proof of insured reliable transportation
- Must be 21 years of age
- Punctual, meticulous, reliable
- Courteous manners with patients
- Have knowledge of strains, genetics, edibles and growing
- Submit to a full background check
- Meticulous attention to detail
- Excellent communication skills
- High level of responsibility
- Flexibility and willingness to pitch-in wherever needed
- Must be confident and customer service oriented when dealing with patients/customers on the phone and in person as well
- Compassion for patients
- Applicable experience as a retail manager or assistant manager

10. *Team Lead (Retail)*

- Valid driver's license, proof of insurance, and reliable transportation
- Must be 21 years of age
- Courteous manner with patients and fellow staff members.
- Strong interpersonal skills/team player.
- Ability to manage time and effectively prioritize.
- Meticulous attention to detail.
- Must be professional and customer service oriented.
- Flexibility and ability to adapt quickly to business needs.
- Must be comfortable with a high level of responsibility.
- Must submit to a full background check.
- Ideally has knowledge of strains, genetics, edibles, and methods of ingestion.

11. *Cultivation Specialist*

- Valid driver's license, proof of insurance, and reliable transportation
- Must be 21 years of age
- Extensive knowledge of horticulture and botany.
- BS or AS in Horticulture/Floriculture/Biology or related field preferred

- Strong interpersonal skills/team player.
- Ability to manage time and effectively prioritize.
- Meticulous attention to detail.
- Must be professional and customer service oriented.
- Flexibility and ability to adapt quickly to business needs.
- Must be comfortable with a high level of responsibility.
- Must submit to a full background check.

12. Patient Provisioning Specialist/Budtender (Retail)

- Valid driver's license, proof of insurance, and reliable transportation
- Must be 21 years of age
- Courteous manner with patients and fellow staff members.
- Strong interpersonal skills/team player.
- Ability to manage time and effectively prioritize.
- Meticulous attention to detail.
- Must be professional and customer service oriented.
- Flexibility and ability to adapt quickly to business needs.
- Must be comfortable with a high level of responsibility.
- Must submit to a full background check.
- Ideally has knowledge of strains, genetics, edibles, and methods of ingestion.

13. Production Specialist

- Valid driver's license, proof of insurance, and reliable transportation
- Must be 21 years of age
- Courteous manner with fellow staff members.
- Team player and strong work ethic.
- Ability to manage time and effectively prioritize.
- Meticulous attention to detail.
- Flexibility and ability to adapt quickly to business needs.
- Must be comfortable with a high level of responsibility.
- Must submit to a full background check.

14. Director of Operations – Manufacturing and Production

- **Personnel Management:** Manages the efforts of direct reporting, as well as matrix reporting, positions. Responsible for selecting, developing, and deploying personnel in the most effective manner to meet objectives. Responsible for performance management, and providing on-going, regular developmental feedback. Influences performance management, compensation decisions, and ongoing feedback for individual contributors reporting to direct report managers, possibly through more than one layer of subordinate management.
- **Communications, Stakeholder Management, and Negotiation of Agreement:** Facilitates communications, manages relationships with stakeholders, and garners support and agreement

from involved parties for security-related compliance initiatives and programs for functional areas across the enterprise.

- Issue Management, Response, and Mitigation: Responsible for issue management, response, and mitigation for functional areas across the enterprise. Proactively identifies risks and issues related to projects and production operations. Anticipates and addresses issues through regular communication with reporting positions and other internal and external parties at all levels, mitigating risk or, in the most severe cases, escalating issues for resolution by more senior levels as necessary.
- Change Management: Responsible for leading change management efforts for functional areas across the enterprise. Identifies and acts upon opportunities to leverage direct reporting team in change management activities; ensures direct reporting team is engaged in change management as appropriate.
- Project Management: Responsible for management of project plans for objectives or projects for functional areas across the enterprise as well as ensuring project timelines and objectives are met for projects managed by reporting positions.
- Provides operational guidance in analyzing and appraising the effectiveness of organizational operations.
- Responsible for overseeing all state program rules and company policy and procedures.
- Represent the company objectives and point of view of the organization to agencies, organizations, and the general public.
- Track and report any required and necessary key performance indicators providing pertinent recommendations and guidance.
- Promote a culture of high performance and continuous improvement that values learning and a commitment to quality.
- Responsible that an effective management team, with appropriate provision for succession, is in place.

15. President

- Provide inspired leadership company wide.
- Make high-level decisions about policy and strategy with strong input from stakeholders
- Maintain strong relationships with local municipalities.
- Develop and implement operational policies and a strategic plan.
- Act as the primary spokesperson for the company.
- Support the company's culture and overall company vision.
- Create an environment that promotes excellent performance and positive morale.
- Oversee the company's fiscal activity, including budgeting, reporting, and auditing.
- Assure all legal and regulatory documents are filed and monitor compliance with laws and regulations.
- Identify and address problems and opportunities for the company.
- Build alliances and partnerships with other organizations.
- Oversee day-to-day operations of the company.
- Work closely with the human resource director to ensure great hiring.

Dispensary agent training

The transition to adult-use will include a comprehensive training for current and new agents. This training will include any new or updated policies or procedures that are relevant for the agent being trained. A detailed training plan will be established, and each agent will be required to undergo training prior to the dispensary transitioning to Adult Use.

At Hiring:

New dispensary agents must complete an initial training regimen prior to performing actual job functions.

- Training includes shadowing a dispensary agent in a similar role with similar job responsibilities
- Training must also include training on confidentiality (patient and employee), as well as in-depth review of the Medical Use of Marijuana and adult-use regulations.
- Incident de-escalation techniques and emergency policies.
- Documentation of all required training, including training regarding privacy and confidentiality requirements, and a signed statement of the individual hired indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters. This must be included in employee's personnel file.
- Responsible Vendor Training
 1. Within 90 days of hiring all employees that are involved in the handling and sale of marijuana for adult-use will attend and successfully complete a responsible vendor program to be designated a "responsible vendor."
 2. Administrative employees who do not handle or sell marijuana may take the "responsible vendor" program on a voluntary basis

On-going:

- At a minimum, staff shall receive a minimum of 8 hours on-going, relevant training and/or supplemental education annually
- The Director of Security will determine the annual training agendas for both dispensary and cultivation staff
- All employees that are involved in the handling and sale of marijuana for adult-use will successfully complete the program once every year thereafter to maintain designation as a "responsible vendor."

Record Keeping Procedures

ATG's records are available for inspection by the CCC upon request. ATG's internal records are maintained in accordance with Generally Accepted Accounting Principles. Written records that are maintained and available for inspection by the Commission include, but are not necessarily limited to, all records required in any section of 935 CMR 500.000 & 935.501.000, in addition to the following:

1. Written operating procedures as required by 935 CMR 500.105(1);
 2. Inventory records as required by 935 CMR 500.105(8);
 3. Seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105(8)(e);
 4. The following personnel records:
 - a. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
 - b. A personnel record for each marijuana establishment agent. ATG records will be maintained for at least 12 months after termination of the individual's affiliation with ATG and will include, at a minimum, the following:
 - i. all materials submitted to the Commission pursuant to 935 CMR 500.030(2);
 - ii. documentation of verification of references;
 - iii. the job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision
 - iv. 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 presenters;
 - v. documentation of periodic performance evaluations;
 - vi. a record of any disciplinary action taken; and
 - vii. notice of completed responsible vendor and eight-hour related duty training.
 - c. A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
 - d. Personnel policies and procedures; and
 - e. All background check reports obtained in accordance with 935 CMR 500.030.
 5. Business records: ATG maintains its financial records within QuickBooks, including all retail and wholesale revenue, all expenses, wages, capital expenditures, liabilities, and all other items that would appear on ATG's profit and loss or balance sheet. These records cover:
 - a. Assets and liabilities;
 - b. Monetary transactions;
 - c. Books of accounts, including journals, ledgers, and supporting documents,
 - d. Sales records including the cost of marijuana products; and
 - e. Salary and wages paid to each employee, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment.
 6. Waste disposal records as required under 935 CMR 500.105(12); and
- In the event of closure, ATG will maintain all records for at least two years in a form and location acceptable to the Commission.**