



Massachusetts Cannabis Control Commission

Marijuana Cultivator

General Information:

License Number: MC281368
Original Issued Date: 11/13/2020
Issued Date: 11/13/2020
Expiration Date: 11/13/2021

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Evergreen Strategies, LLC.

Phone Number: 617-997-6888 Email Address: anthony@evergreenstrategiesllc.net

Business Address 1: 52 Whispering Way

Business Address 2:

Business City: Stow

Business State: MA

Business Zip Code: 01775

Mailing Address 1: 52 Whispering Way

Mailing Address 2:

Mailing City: Stow

Mailing State: MA

Mailing Zip Code: 01775

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

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

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 100

Percentage Of Control: 100

Role: Executive / Officer

Other Role:

First Name: Anthony

Last Name: Parrinello

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:	Percentage Of Control:	
Role: Executive / Officer	Other Role:	
First Name: Jean	Last Name: Welsh	Suffix:
Gender: Female	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

Close Associates or Member 1

First Name: Catherine	Last Name: Parrinello	Suffix:
Describe the nature of the relationship this person has with the Marijuana Establishment: Catherine Parrinello is the wife of the Company owner Anthony Parrinello.		
Catherine is also the sole capital contributor to the Company's initial capital.		

CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: Catherine	Last Name: Parrinello	Suffix:
Types of Capital: Monetary/Equity	Other Type of Capital:	Total Value of the Capital Provided: \$50000 Percentage of Initial Capital: 100
Capital Attestation: Yes		

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

Business Interest in Other State 1

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner			
Owner First Name:	Owner Last Name: Parrinello	Owner Suffix:	
Anthony			
Entity Legal Name: Temescal Wellness, Inc.		Entity DBA:	
Entity Description: New Hampshire Licensed Therapeutic Cannabis Operator			
Entity Phone:	Entity Email:	Entity Website: www.temescalwellness.com	
603-285-9383	info@temescalwellness.com		
Entity Address 1: 645 Harvey Rd.		Entity Address 2:	
Entity City: Manchester	Entity State: NH	Entity Zip Code: 03103	Entity Country: United States
Entity Mailing Address 1: 645 Harvey Rd.		Entity Mailing Address 2:	
Entity Mailing City:	Entity Mailing State: NH	Entity Mailing Zip Code:	Entity Mailing Country: United States
Manchester		03103	

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Anthony **Last Name:** Parrinello **Suffix:**
Marijuana Establishment Name: Temescal Wellness of Massachusetts, Inc **Business Type:** Marijuana Retailer
Marijuana Establishment City: Worcester, Pittsfield, Framingham and Hudson **Marijuana Establishment State:** MA

Individual 2

First Name: Anthony **Last Name:** Parrinello **Suffix:**
Marijuana Establishment Name: 202 Trading Company, Inc. d/b/a/ Bud Barn **Business Type:** Marijuana Retailer
Marijuana Establishment City: Winchendon **Marijuana Establishment State:** MA

Individual 3

First Name: Anthony **Last Name:** Parrinello **Suffix:**
Marijuana Establishment Name: Evergreen Strategies, LLC. **Business Type:** Other
Marijuana Establishment City: North Adams, Worcester, West Boylston **Marijuana Establishment State:** MA

Individual 4

First Name: Catherine **Last Name:** Parrinello **Suffix:**
Marijuana Establishment Name: Evergreen Strategies, LLC **Business Type:** Other
Marijuana Establishment City: North Adams, Worcester, West Boylston **Marijuana Establishment State:** MA

Individual 5

First Name: Jean **Last Name:** Welsh **Suffix:**
Marijuana Establishment Name: Evergreen Strategies, Inc. **Business Type:** Other
Marijuana Establishment City: North Adams, Worcester, West Boylston **Marijuana Establishment State:** MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 0 Hartwell Street
Establishment Address 2:
Establishment City: West Boylston **Establishment Zip Code:** 01583
Approximate square footage of the Establishment: 20000 **How many abutters does this property have?:** 10
Have all property abutters have been notified of the intent to open a Marijuana Establishment at this address?: Yes
Cultivation Tier: **Cultivation Environment:**

FEE QUESTIONS

Cultivation Tier: Tier 03: 10,001 to 20,000 sq. ft **Cultivation Environment:** Indoor

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	HCA Certification.pdf	pdf	5e9ca88fb7c619391b8bc350	04/19/2020
Community Outreach Meeting Documentation	COM Documentation West Boylston.pdf	pdf	5e9f909f2b97cf38fa378b13	04/21/2020
Plan to Remain Compliant with Local Zoning	WB Plan to Remain Compliant with Zoning_V2.0.pdf	pdf	5eb4b56a0f96d32d2066f286	05/07/2020

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.: \$

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 for Positive Impact Final1.pdf	pdf	5e9caf86172cbc3545978894	04/19/2020

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Executive / Officer Other Role:

First Name: Anthony Last Name: Parrinello Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 2

Role: Other (specify) Other Role: Capital Contributor

First Name: Catherine Last Name: Parrinello Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 3

Role: Employee Other Role:

First Name: jean Last Name: Welsh Suffix:

RMD Association: Not associated with an RMD

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID
Secretary of Commonwealth - Certificate of Good Standing	Evergreen COGS SOS 03162020.pdf	pdf	5e9cb419b7c619391b8b
Bylaws	Operating Agreement.pdf	pdf	5e9cb4479a385038d9d8
Articles of Organization	Cert of Organization.pdf	pdf	5e9cb4992eba6d38ef168
Department of Revenue - Certificate of Good standing	https_mtc.dor.state.ma.us_mtc___Retrieve_0_d-__qbfdXICXLGEbRCHPlq_ZVQ___FILE__=TAPVIEWMAIL&PARAMS__=8667888258256813502.pdf	pdf	5e9cb5655f1da0353e2b5

Department of DUA_Certificate.pdf pdf 5e9cb58d2eba6d38ef168

Revenue -

Certificate of

Good standing

No documents uploaded

Massachusetts Business Identification Number: 001317729

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	Liability Insurance Plan.pdf	pdf	5e9cb5e5f0445c357cb0a15b	04/19/2020
Proposed Timeline	WB Cultivation Proposed Timeline.pdf	pdf	5e9cb81d5f1da0353e2b5ae6	04/19/2020
Business Plan	Evergreen Executive Summary Biz Plan.pdf	pdf	5e9f92139a385038d9d8d8f6	04/21/2020

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Restricting Access to age 21 and older	ES Cultivation_Policy for Limiting Access to Age 21 and Older.pdf	pdf	5e9cd8781cdd2e3910a558d8	04/19/2020
Separating recreational from medical operations, if applicable	WB Policy for Separating Recreational from Medical Operations.pdf	pdf	5e9cd87ab7c619391b8bc386	04/19/2020
Policies and Procedures for cultivating.	Evergreen Cultivation SOP.pdf	pdf	5e9cd87d172cbc35459788b7	04/19/2020
Storage of marijuana	ES Cultivation Storage SOP.pdf	pdf	5e9cd8a5b014bf38e46d0aa0	04/19/2020
Prevention of diversion	ES Cultivation Prevention of Diversion SOP.pdf	pdf	5e9cd8a681ed8a355b8db5ae	04/19/2020
Security plan	ES Cultivation Security Plan.pdf	pdf	5e9cd8a8482e703583b7e1a7	04/19/2020
Quality control and testing	ES Quality Control and Product Testing.pdf	pdf	5e9cd8c681ed8a355b8db5b2	04/19/2020
Inventory procedures	ES Inventory of Marijuana.pdf	pdf	5e9cd8c7554b033566cd36a8	04/19/2020
Transportation of marijuana	ES Transportation of Marijuana SOP.pdf	pdf	5e9cd8cb961ad539052c09fd	04/19/2020
Record Keeping procedures	ES Record Keeping Procedure.pdf	pdf	5e9cd8efb7c619391b8bc38c	04/19/2020
Personnel policies including background checks	ES Personnel Policies_including Background Checks.pdf	pdf	5e9cd8f0172cbc35459788bb	04/19/2020
Dispensing procedures	ES Policy for Dispensing.pdf	pdf	5e9cd8f29a385038d9d8d40d	04/19/2020
Diversity plan	Diversity_Plan_12919.pdf	pdf	5e9cd915b3c49635509ed794	04/19/2020
Maintaining of financial records	ES Maintenance of Financial Records Policy and Procedure.pdf	pdf	5e9cd9162eba6d38ef16807f	04/19/2020
Qualifications and training	ES Qualifications and Training Policy and Procedure.pdf	pdf	5e9cd917b014bf38e46d0aa4	04/19/2020

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

ADDITIONAL INFORMATION NOTIFICATION

Notification:

COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

Monday From: 8:00 AM	Monday To: 8:00 PM
Tuesday From: 8:00 AM	Tuesday To: 8:00 PM
Wednesday From: 8:00 AM	Wednesday To: 8:00 PM
Thursday From: 8:00 AM	Thursday To: 8:00 PM
Friday From: 8:00 AM	Friday To: 8:00 PM
Saturday From: 8:00 AM	Saturday To: 8:00 PM
Sunday From: 8:00 AM	Sunday To: 8:00 PM

Host Community Agreement Certification Form

Instructions

Certification of a host community agreement is a requirement of the application to become a Marijuana Establishment (ME) and Medical Marijuana Treatment Center (MTC). Applicants must complete items 1-3. The contracting authority for the municipality must complete items 4-8. Failure to complete a section will result in the application not being deemed complete. This form should be completed and uploaded into your application. 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(2) and 501.400(2).

Certification

The parties listed below do certify that the applicant and municipality have executed a host community agreement on the specified date below pursuant to G.L. c. 94G § 3(d):

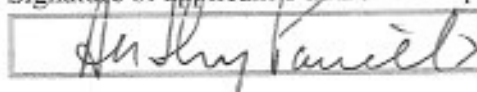
1. Name of applicant:

Evergreen Strategies LLC

2. Name of applicant's authorized representative:

Anthony Parrinello

3. Signature of applicant's authorized representative:



4. Name of municipality:

Town of West Boylston

5. Name of municipality's contracting authority or authorized representative:

Nancy Lucier

6. Signature of municipality's contracting authority or authorized representative:

Kenya Lucia

7. Email address of contracting authority or authorized representative of the municipality (*this email address may be used to send municipal notices pursuant to 935 CMR 500.102(1) and 501.102(1).*):

nlucier@westboyllston-ma.gov

8. Host community agreement execution date:

April 15, 2000



Cannabis
Control
Commission

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Community Outreach Meeting Attestation Form

Instructions

Community Outreach Meeting(s) are a requirement of the application to become a Marijuana Establishment (ME) and Medical Marijuana Treatment Center (MTC). 935 CMR 500.101(1), 500.101(2), 501.101(1), and 501.101(2). The applicant must complete each section of this form and attach all required documents as a single PDF document before uploading it into the application. If your application is for a license that will be located at more than one (1) location, and in different municipalities, applicants must complete two (2) attestation forms – one for each municipality. Failure to complete a section will result in the application not being deemed complete. 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(2) and 501.400(2).

Attestation

I, the below indicated authorized representative of that the applicant, attest that the applicant has complied with the Community Outreach Meeting requirements of 935 CMR 500.101 and/or 935 CMR 501.101 as outlined below:

1. The Community Outreach Meeting was held on the following date(s): 2/25/2020
2. At least one (1) meeting was held within the municipality where the ME is proposed to be located.
3. At least one (1) meeting was held after normal business hours (this requirement can be satisfied along with requirement #2 if the meeting was held within the municipality and after normal business hours).

4. A copy of the community outreach notice containing the time, place, and subject matter of the meeting, including the proposed address of the ME or MTC was published in a newspaper of general circulation in the municipality at least 14 calendar days prior to the meeting. A copy of this publication notice is labeled and attached as "Attachment A."

a. Date of publication:

2/11/20

b. Name of publication:

Worcester
Telegraph & Gazette

Worcester Telegram & Gazette

5. A copy of the community outreach notice containing the time, place, and subject matter of the meeting, including the proposed address of the ME or MTC was filed with clerk of the municipality. A copy of this filed notice is labeled and attached as "Attachment B."

a. Date notice filed:

2/10/20

6. A copy of the community outreach notice containing the time, place, and subject matter of the meeting, including the proposed address of the ME or MTC was mailed at least seven (7) calendar days prior to the community outreach meeting to abutters of the proposed address, and residents within 300 feet of the property line of the applicant's proposed location as they appear on the most recent applicable tax list, notwithstanding that the land of the abutter or resident is located in another municipality. A copy of this mailed notice is labeled and attached as "Attachment C." Please redact the name of any abutter or resident in this notice.

a. Date notice(s) mailed:

2/10/20

7. The applicant presented information at the Community Outreach Meeting, which at a minimum included the following:
- The type(s) of ME or MTC to be located at the proposed address;
 - Information adequate to demonstrate that the location will be maintained securely;
 - Steps to be taken by the ME or MTC to prevent diversion to minors;
 - A plan by the ME or MTC to positively impact the community; and
 - Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.
8. Community members were permitted to ask questions and receive answers from representatives of the ME or MTC.

Name of applicant:

Evergreen Strategies, LLC.

Name of applicant's authorized representative:

Anthony Parrinello

Signature of applicant's authorized representative:

Anthony Parrinello

COMMUNITY OUTREACH MEETING

Community Outreach Meeting Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for February 25th 2020 at 7pm at 42 West Boylston Street West Boylston, MA 01583. The proposed types of marijuana establishment is cultivation, product manufacturing and research is anticipated to be located at map/lot 170/006 Hartwell Street (a.k.a. "the lot across from the American Legion) West Boylston MA 01583. There will be an opportunity for the public to ask questions. This location does NOT include a Retail Dispensary. Evergreen Strategies, LLC February 8th 2020 Evergreen Strategies, LLC February 8th 2020

Appeared in: *Worcester Telegram & Gazette* on Tuesday, 02/11/2020

[Back](#)

Dear Town of West Boylston Municipal Officials-

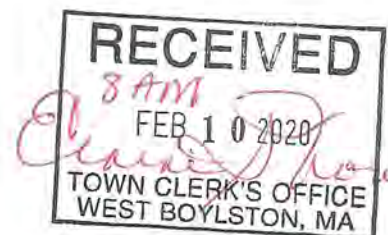
As you likely know the MA Cannabis Control Commission requires applicants to notify the host municipality of a Community Outreach Meeting under 935 CMR 500.000 which establishes the regulatory requirements for adult use marijuana in the Commonwealth. Please find Evergreen's notice below. This will also run the Telegram and Gazette.

Attention Town Clerk- The MA CCC has previously requested of applicants that they submit with their application a "date/time stamped" notice which is posted in town hall. Would you kindly sending me via email, a scanned copy of such "time stamped" notice?

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for February 25th 2020 at 7pm at 42 West Boylston Street West Boylston, MA 01583. The proposed cultivation, product manufacturing and research facility is anticipated to be located at map/lot 170/006 (a.k.a. "the lot across from the American Legion) Hartwell Street West Boylston MA 01583. There will be an opportunity for the public to ask questions. This facility does NOT include a retail dispensary.

Evergreen Strategies, LLC
February 7th, 2020

Anthony Parrinello
Evergreen Strategies
+1.617.997.6888



From: [Anthony Parrinello](#)
To: [Nancy Lucier](#); selectboard@westboylston-ma.gov; townclerk@westboylston-ma.gov; planningboard@westboylston-ma.gov
Subject: Community Outreach Meeting Notice- Evergreen Strategies LLC (action required from Town Clerk)
Date: Friday, February 7, 2020 11:54:57 AM

Dear Town of West Boylston Municipal Officials-

As you likely know the MA Cannabis Control Commission requires applicants to notify the host municipality of a Community Outreach Meeting under 935 CMR 500.000 which establishes the regulatory requirements for adult use marijuana in the Commonwealth. Please find Evergreen's notice below. This will also run the Telegram and Gazette.

Attention Town Clerk- The MA CCC has previously requested of applicants that they submit with their application a "date/time stamped" notice which is posted in town hall. Would you kindly sending me via email, a scanned copy of such "time stamped" notice?

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana

Establishment is scheduled for February 25th 2020 at 7pm at 42 West Boylston Street West Boylston, MA 01583. The proposed cultivation, product manufacturing and research facility is anticipated to be located at map/lot 170/006 (a.k.a. "the lot across from the American Legion) Hartwell Street West Boylston MA 01583. There will be an opportunity for the public to ask questions. This facility does NOT include a retail dispensary.

Evergreen Strategies, LLC
February 7th, 2020

--

Anthony Parrinello
Evergreen Strategies
+1.617.997.6888

Attachment C

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for February 25th 2020 at 7pm at 42 West Boylston Street West Boylston, MA 01583. The proposed cultivation, product manufacturing and research facility is anticipated to be located at map/lot 170/006 (a.k.a. "the lot across from the American Legion) Hartwell Street West Boylston MA 01583. There will be an opportunity for the public to ask questions. This facility does NOT include a retail dispensary.

Evergreen Strategies, LLC
February 10th, 2020



300 foot Abutters List Report

West Boylston, MA
February 10, 2020

Attachment C

Subject Property:

Parcel Number: 170/006/000
CAMA Number: 170/006/000/000
Property Address: HARTWELL STREET

Mailing Address: JH ENERGY USA LLC
1285 BARING BLVD
SPARKS, NV 89434

Abutters:

Parcel Number: 152/061/000
CAMA Number: 152/061/000/000
Property Address: TEMPLE STREET

Mailing Address:

Parcel Number: 169/025/000
CAMA Number: 169/025/000/000
Property Address: HARTWELL STREET

Mailing Address:

Parcel Number: 169/026/000
CAMA Number: 169/026/000/000
Property Address: 160 HARTWELL STREET

Mailing Address:

Parcel Number: 169/026/001
CAMA Number: 169/026/001/000
Property Address: HARTWELL STREET

Mailing Address:

Parcel Number: 169/026/002
CAMA Number: 169/026/002/000
Property Address: SHREWSBURY STREET

Mailing Address:

Parcel Number: 170/001/000
CAMA Number: 170/001/000/000
Property Address: 159 HARTWELL STREET

Mailing Address:

Parcel Number: 170/002/000
CAMA Number: 170/002/000/000
Property Address: 211 HARTWELL STREET

Mailing Address:

Parcel Number: 170/004/000
CAMA Number: 170/004/000/000
Property Address: HARTWELL STREET REAR

Mailing Address:

Parcel Number: 170/005/000
CAMA Number: 170/005/000/000
Property Address: HARTWELL STREET

Mailing Address:

Parcel Number: 170/007/000
CAMA Number: 170/007/000/000
Property Address: HARTWELL STREET

Mailing Address:



www.cai-tech.com

Data shown on this report is provided for planning and informational purposes only. The municipality and CAI Technologies are not responsible for any use for other purposes or misuse or misrepresentation of this report.

2/10/2020

Page 1 of 1

Abutters List Report - West Boylston, MA

MDL

Attachment C

3 months, not 22/14

Booth MS 22114

Buller's, Nov 21 PL 2

West Bay/5 km, area 01583

Shawbury. no 21545

Shane NV ~~89434~~
89434

West Bayshore, road 01583

West Bay/Star, Ab 01583

Evergreen Strategies Plan to Remain Compliant with Local Zoning

The purpose of this plan is to outline how Evergreen Strategies will remain in compliance with local codes, ordinances, and bylaws for the physical address of our Retail Marijuana Establishment at 0 Hartwell Street in West Boylston which shall include, but not be limited to, the identification of any local licensing requirements for the adult use of marijuana

Background

The Town of West Boylston enacted a Zoning Bylaw that established zoning restrictions for Adult-Marijuana Establishments.

Per Section 3.13 of the Zoning Bylaw eligible zones for adult use Cultivation and Product Manufacturing Marijuana Establishments may be allowed by Special Permit issued by the Planning Board in the following locations Zoning Districts: Business (B), Industrial (I), and Commercial/Limited Industrial (CLI). Additionally, Marijuana Establishments may not be located within 500 feet of a pre-existing public or private school providing education in kindergarten or any of grades 1 through 12; licensed day-care center; Family Day Care Home, place of worship; library; park; or playground establishment.

Our location at 0 Hartwell Street is located in the Industrial (I) District and is compliant with all required setbacks. Evergreen Strategies has an executed Host Community Agreement with the Town.

There are no local licensing requirements for Marijuana Establishments.

Once issued, the Special Permit shall lapse at the end of one (1) year from the date of issuance, not including such time required to pursue or await the determination of an appeal, referred to in G.L.c.40A, § 9, from grant thereof, if a substantial use thereof has not commenced, except for good cause or, in the case of permit for construction, if construction has not begun by such date except for good cause

Evergreen Strategies, Inc. has reviewed this by-law in its entirety and has developed plans and strategies on compliance with all of the requirements and special permit conditions.

Ongoing Compliance

Evergreen Strategies is committed to remaining in compliance with all with local codes, ordinances, and bylaws. Our CEO and Compliance Officer will make periodic assessments of our operation for compliance with all applicable local, state and federal laws and regulations, including zoning and special permit compliance.

We will apply for our Special Permit in June of 2020 and hope to receive the Special Permit in July or August. We fully expect to begin construction by October of 2020 and will not need to renew our Special Permit.

We will remain in contact with municipal officials including the Town Manager, Selectboard, Planning Board and other applicable officials to ensure that there is an open line of communication. We will remain up to date with all zoning Bylaws and requirements to ensure that Evergreen Strategies, Inc. remains in compliance.

EVERGREEN STRATEGIES, LLC

PLAN FOR POSITIVELY IMPACTING AREAS OF DISPROPORTIONATE IMPACT

Evergreen Strategies is privileged to help individuals from “Areas of Disproportionate Impact” experience a positive impact from the operation of our Retail Marijuana Establishments. Worcester and North Adams are two of 29 communities designated as “areas of disproportionate impact” meaning these municipalities have been disproportionately affected by cannabis prohibition and enforcement. Our plan with the accompanying goals, programs and measurements is specifically designed to provide opportunities for residents in North Adams and those designated areas of the City of Worcester.

Evergreen Strategies acknowledges and is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment and that any actions taken, or programs instituted, will not violate the Commission’s regulations with respect to limitations on ownership or control or other applicable state laws.

The organizations named in our Community Service Partner Program have been contacted and are willing to accept the donations that we intend to provide. (See supporting documentation included with this communication)

1. PROGRAM POPULATIONS

The programs in this plan will be aimed to positively impact the following populations:

- A. Past or present residents of “areas of disproportionate impact,” which have been defined by the Commission, specifically the City of North Adams and those areas of the City of Worcester identified as areas of disproportionate impact.
 - B. Commission-designated Economic Empowerment Priority applicants;
 - C. Commission-designated Social Equity Program participants;
 - D. Massachusetts residents who have past drug convictions; and
 - E. Massachusetts residents with parents or spouses who have drug convictions.
-

2. GOALS FOR POSITIVE IMPACT

- A. Create jobs for North Adams and Worcester residents living in an area of disproportionate impact with a compensation structure, employee benefit package and growth opportunities that provide a living wage and encourage consumer spending. Our goal is to have 60% of our workforce meet the criteria outlined in the above listed Program Population.
 - B. Partner with an established not-for-profit community organization that provides direct social services to populations in North Adams or Worcester. Our goal is to provide a minimum donation of \$12,000 and 100 hours of service annually
 - C. Offer free mentoring and cannabis business advisory services to at least one Commission Designated Economic Empowerment Priority applicant.
-

3. PROGRAMS

EMPLOYMENT PROGRAM

Expanding opportunities for gainful employment is a key driver in helping communities disproportionately affected by cannabis prohibition. Quality jobs that pay above minimum wage and offer benefits assist individuals and families in breaking cycles of poverty and incarceration. The

company's dispensary plans to positively impact employment opportunities in areas of disproportionate impact in North Adams and Worcester with the following programs:

- A. Recruitment and hiring will offer preference to individuals who meet the criteria outlined in the Program Populations listed above.
- B. Postings will be listed with the MassHire Berkshire Career Center and the Worcester Workforce Central Career Center along with advertisements in the Berkshire Eagle and the Worcester Telegram. These postings will outline our preference to hiring individuals who meet our Program Population. These posting will include a statement encouraging individuals with nonviolent drug convictions or whose parents or spouses have nonviolent drug convictions to apply.
- C. Our website will list all open positions and outline our preference to hiring individuals who meet our Program Population.
- D. Retail Sales Associate wages at the establishment will range from \$15-\$20 per hour which is substantially higher than the current average retail wage of \$12.44 per hour statewide. (Indeed.com August 2018 report from 2088 retail employees in MA).
- E. Employees working at least 30 hours per week or 130 hours per month are eligible to participate in an employer-sponsored health plan. Similarly, paid vacation and sick benefits are available to 30+ hour employees.

All elements of this program will be implemented in their entirety 60 days prior to our planned opening date.

COMMUNITY SERVICE PARTNER PROGRAM

Evergreen Strategies has chosen the South Worcester Neighborhood Improvement Corp. (SWNIC) <http://www.swnic.net/> as our community service partner. SWNIC is a 501(c)(3) charity that serves areas of disproportionate areas, specifically census tracts 731002, 731203, 731204, 731300, 732400, 732700 and 733000 in the City of Worcester. SWNIC is located in census tract 733000. SWNIC services include facilitating access to housing, employment opportunities, health services, education and other social services to the residents of South Worcester.

- A. Evergreen Strategies will make a minimum \$12,000 donation annually to the above-named organization.
 - i. The first donation will occur once we have received provisional licensure form the Commission.
- B. Each 30+ hour employee with 3+ months company tenure will receive 10 hours of paid volunteerism to these organizations. We expect to deliver at least 100 paid volunteer hours to the agency each year.
 - i. The donation of volunteer hours will begin no later than 90 days after we have commenced operations.
- C. Support for SWNIC's food pantry will be encouraged through ongoing staff participation and an annual food drive.
 - i. Our first food drive will be done prior to December 20th of 2019 (if operational) but no later than 45 days after becoming operational.

ECONOMIC EMPOWERMENT MENTORING PROGRAM

Evergreen Strategies will mentor and consult, for no charge, a Commission Designated Economic Empowerment Priority applicant. Being an experienced marijuana operator in the regulated cannabis industry, Evergreen has the ability to use this experience to further their goals of applying for and receiving a License to operate a Marijuana Establishment from the Commission. The services that

we will provide include application services, business plan development, host community engagement, security plan and policy and procedure development as well as general industry advise and consulting. We will provide at least 100 hours annually to this mentoring program.

- A. Evergreen implemented this program in early 2018 and chose KG Collective, LLC as the recipient of our mentoring and consulting services. We have been working with the KG Collective since 2018 and will continue to assist and mentor the KG Collective in securing their first Retail Marijuana Establishment License. To date, Evergreen has provided over 60 hours of mentoring and consulting to the KG Collective in areas of regulatory compliance, site selection, application preparation, business plan development and security planning. We will provide at least 100 additional hours over the next 6 months.
-

4. MEASUREMENTS

Annually, 60 days prior to our License renewal, Evergreen Strategies will conduct a comprehensive written evaluation of the programs outlined above. The purpose of the evaluation will be to measure the goals that are outlined in this Plan. This written evaluation will be available to the Commission for review during the License renewal process.

EMPLOYMENT PROGRAM MEASUREMENTS

Each adult use marijuana dispensary is expected to employ 15 to 20 individuals when fully operational. Program evaluation metrics from the company's talent management database will be evaluated quarterly with the following metrics reported to management:

- A. Number and types of jobs created in the adult-use cannabis industry in geographic areas of disproportionate impact;
- B. The number and percentage of employees that come from disproportionate impacted areas;
- C. The number and percentage of employees that have prior drug convictions or whose parents or spouses have prior drug convictions; and
- D. The number and percentage of applicants who meet the Program Populations, and if not hired, a detailed explanation why they were not hired.

COMMUNITY SERVICE PARTNER MEASUREMENTS

- A. Financial records will demonstrate a minimum \$12,000 donation to our Community Service Partner annually.
- B. Personnel & payroll records will indicate minimum of 100 paid volunteer hours by Evergreen staff.
- C. Documentation of participation in a minimum of one food drive for our Community Service Partner.

ECONOMIC EMPOWERMENT MENTORING PROGRAM MEASUREMENTS

- A. The types of services provided to the KG Collective;
- B. The number of hours spent by the Evergreen Strategies team in providing these services;
- C. The status and progress of the KG Collective with their host community and Commission application; and
- D. Other milestones that have been achieved by KG Collective.

South Worcester Neighborhood Improvement Corporation

47 Camp Street-Worcester, MA 01603 508-757-8344

City Manager Edward Augustus, Jr.

Office of the City Manager

455 Main Street

Worcester, MA 01608

Dear Mr. City Manager,

On August 14, 2018, SWNIC hosted a community meeting featuring the intentions of Evergreen Strategies to open a retail marijuana facility in Worcester on Route 20 near Sunderland Road. The hearing was attended by residents and elected officials, George Russell and Kate Toomey.

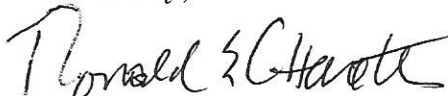
During the hearing, Anthony Parrinello, president of Evergreen, told the group that he plans on a portion of the profits from the sales, will be donated to SWNIC.

The funds will be used to help support our summer youth program, the after school program at Autumn Woods and our South Worcester Sports programs.

The SWNIC Board of Directors has voted to accept this donation and support the application of Evergreen Strategies. Their business model, as explained to us, makes good sense. The board also felt that the financial benefit to the City was impactful.

If there are any questions, please feel free to contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ronald E. Charette". The signature is fluid and cursive, with the first name "Ronald" being more prominent.

Ronald E. Charette

Executive Director

The KG Collective, LLC

1536 Tremont St

Boston, MA 02120

July 1, 2019

Anthony,

The KG Collective, LLC. (EEA201959) is happy and willing to accept Evergreen Strategies no cost mentoring and advising services as part of your Positive Impact Plan, Economic Empowerment Program. We look forward to continuing working with you as both of our Companies move forward through the Cannabis Control Commission's licensing process and becoming operational.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Pires", with a long horizontal flourish extending to the right.

Michael Pires



William Francis Galvin
Secretary of the
Commonwealth

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

March 16, 2020

TO WHOM IT MAY CONCERN:

I hereby certify that a certificate of organization of a Limited Liability Company was filed in this office by

EVERGREEN STRATEGIES LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **March 15, 2018.**

I further certify that said Limited Liability Company has filed all annual reports due and paid all fees with respect to such reports; that said Limited Liability Company has not filed a certificate of cancellation; that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156C, § 70 for said Limited Liability Company's dissolution; and that said Limited Liability Company is in good standing with this office.

I also certify that the names of all managers listed in the most recent filing are:
ANTHONY LAWRENCE PARRINELLO

I further certify, the names of all persons authorized to execute documents filed with this office and listed in the most recent filing are: **ANTHONY LAWRENCE PARRINELLO**

The names of all persons authorized to act with respect to real property listed in the most recent filing are: **ANTHONY LAWRENCE PARRINELLO**

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



**LIMITED LIABILITY COMPANY OPERATING AGREEMENT
OF
Evergreen Strategies**

This Single-member LLC Operating Agreement represents Evergreen Strategies that was formed in the State of Massachusetts on March 15th 2018, hereinafter known as the "Company".

Anthony Parrinello of 52 Whispering Way, Stow, Massachusetts, 01775 is recognized as the sole member of the Company (the "Member(s)").

NOW, THEREFORE, for good and valuable consideration the receipt and sufficiency of which is hereby acknowledged, it is agreed as follows:

1. Name and Principal Place of Business

The name of the Company is Evergreen Strategies with a principal place of business at 52 Whispering Way, Stow, Massachusetts, 01775. The mailing address shall be the same address as the principal office location.

2. Registered Agent

The name of the Registered Agent is Anthony Parrinello with a registered office located at 52 Whispering Way, Stow, Massachusetts, 01775 for the service of process as of March 15th 2018. This may change at any time by the Company filing an amendment with the Secretary of State, or respective office, in the State of Massachusetts.

3. Formation

The Company was formed on March 15th 2018, when the Member(s) filed the Articles of Organization with the office of the Secretary of State pursuant to the statutes governing limited liability companies in the State of Massachusetts (the "Statutes").

4. Purpose

The purpose of the Company is to engage in and conduct any and all lawful businesses, activities or functions, and to carry on any other lawful activities in connection with or incidental to the foregoing, as the Member(s) in their discretion shall determine.

5. Term

The term of the Company shall be perpetual, commencing on the filing of the Articles of Organization of the Company, and continuing until terminated under the provisions set forth herein.

6. Member(s) Capital Contributions

The Member(s) shall be making a Capital Contribution described as: \$150,000.00 start up capital

7. Distributions.

The Member may make such capital contributions (each a "Capital Contribution") in such amounts and at such times as the Member shall determine. The Member shall not be obligated to make any

Capital Contributions. The Member may take distributions of the capital from time to time in accordance with the limitations imposed by the Statutes.

A "Capital Account" for the Member's shall be maintained by the Company. The Member's Capital Account shall reflect the Member's capital contributions and increases for any net income or gain of the Company. The Member's Capital Account shall also reflect decreases for distributions made to the Member and the Member's share of any losses and deductions of the Company.

8. Books, Records and Tax Returns

The Company shall maintain complete and accurate books and records of the Company's business and affairs as required by the Statutes and such books and records shall be kept at the Company's Registered Office and shall in all respects be independent of the books, records and transactions of the Member.

The Company's fiscal year shall be the calendar year with an ending month of December.

The Member intends that the Company, as a single member LLC, shall be taxed as a S-Corporation in accordance with the provisions of the Internal Revenue Code.

9. Bank Accounts

All funds of the Company shall be deposited in the Company's name in a bank account or accounts as chosen by the Member(s). Withdrawals from any bank accounts shall be made only in the regular course of business of the Company and shall be made upon such signature or signatures as the Member(s) from time to time may designate.

10. Management of the Company

The business and affairs of the Company shall be conducted and managed by a manager in accordance with this Agreement and the laws of the State of Massachusetts.

Anthony Parrinello, as sole member of the Company, has sole authority and power to act for or on behalf of the Company, to do any act that would be binding on the Company, or incur any expenditures on behalf of the Company. The Member shall not be liable for the debts, obligations or liabilities of the Company, including under a judgment, decree or order of a court. The Company is organized as a "member-managed" limited liability company. The Member is designated as the initial managing member.

11. Ownership of Company Property

The Company's assets shall be deemed owned by the Company as an entity, and the Member shall have no ownership interest in such assets or any portion thereof. Title to any or all such Company assets may be held in the name of the Company, one or more nominees or in "street name", as the Member may determine.

Except as limited by the Statutes, the Member may engage in other business ventures of any nature, including, without limitation by specification, the ownership of another business similar to that operated by the Company. The Company shall not have any right or interest in any such independent ventures or to the income and profits derived therefrom.

12. Dissolution and Liquidation

The Company shall dissolve and its affairs shall be wound up on the first to occur of (i) At a time, or upon the occurrence of an event specified in the Articles of Organization or this Agreement. (ii) The determination by the Member that the Company shall be dissolved.

Upon the death of the Member, the Company shall be dissolved. By separate written documentation, the Member shall designate and appoint the individual who will wind down the Company's business and transfer or distribute the Member's Interests and Capital Account as designated by the Member or as may otherwise be required by law.

Upon the disability of a Member, the Member may continue to act as Manager hereunder or appoint a person to so serve until the Member's Interests and Capital Account of the Member have been transferred or distributed.

13. Indemnification

The Member (including, for purposes of this Section, any estate, heir, personal representative, receiver, trustee, successor, assignee and/or transferee of the Member) shall not be liable, responsible or accountable, in damages or otherwise, to the Company or any other person for: (i) any act performed, or the omission to perform any act, within the scope of the power and authority conferred on the Member by this agreement and/or by the Statutes except by reason of acts or omissions found by a court of competent jurisdiction upon entry of a final judgment rendered and un-appealable or not timely appealed ("Judicially Determined") to constitute fraud, gross negligence, recklessness or intentional misconduct; (ii) the termination of the Company and this Agreement pursuant to the terms hereof; (iii) the performance by the Member of, or the omission by the Member to perform, any act which the Member reasonably believed to be consistent with the advice of attorneys, accountants or other professional advisers to the Company with respect to matters relating to the Company, including actions or omissions determined to constitute violations of law but which were not undertaken in bad faith; or (iv) the conduct of any person selected or engaged by the Member.

The Company, its receivers, trustees, successors, assignees and/or transferees shall indemnify, defend and hold the Member harmless from and against any and all liabilities, damages, losses, costs and expenses of any nature whatsoever, known or unknown, liquidated or unliquidated, that are incurred by the Member (including amounts paid in satisfaction of judgments, in settlement of any action, suit, demand, investigation, claim or proceeding ("Claim"), as fines or penalties) and from and against all legal or other such costs as well as the expenses of investigating or defending against any Claim or threatened or anticipated Claim arising out of, connected with or relating to this Agreement, the Company or its business affairs in any way; provided, that the conduct of the Member which gave rise to the action against the Member is indemnifiable under the standards set forth herein.

Upon application, the Member shall be entitled to receive advances to cover the costs of defending or settling any Claim or any threatened or anticipated Claim against the Member that may be subject to indemnification hereunder upon receipt by the Company of any undertaking by or on behalf of the Member to repay such advances to the Company, without interest, if the Member is Judicially Determined not to be entitled to indemnification as set forth herein.

All rights of the Member to indemnification under this Agreement shall (i) be cumulative of, and in addition to, any right to which the Member may be entitled to by contract or as a matter of law or equity, and (ii) survive the dissolution, liquidation or termination of the Company as well as the death, removal, incompetency or insolvency of the Member.

The termination of any Claim or threatened Claim against the Member by judgment, order, settlement or upon a plea of *nolo contendere* or its equivalent shall not, of itself, cause the Member not to be entitled to indemnification as provided herein unless and until Judicially Determined to not be so entitled.

14. Miscellaneous

This Agreement and the rights and liabilities of the parties hereunder shall be governed by and determined in accordance with the laws of the State of Massachusetts. If any provision of this Agreement shall be invalid or unenforceable, such invalidity or unenforceability shall not affect the other provisions of this Agreement, which shall remain in full force and effect.

The captions in this Agreement are for convenience only and are not to be considered in construing this Agreement. All pronouns shall be deemed to be the masculine, feminine, neuter, singular or plural as the identity of the person or persons may require. References to a person or persons shall include partnerships, corporations, limited liability companies, unincorporated associations, trusts, estates and other types of entities.

This Agreement, and any amendments hereto may be executed in counterparts all of which taken together shall constitute one agreement.

This Agreement sets forth the entire agreement of the parties hereto with respect to the subject matter hereof. It is the intention of the Member(s) that this Agreement shall be the sole agreement of the parties, and, except to the extent a provision of this Agreement provides for the incorporation of federal income tax rules or is expressly prohibited or ineffective under the Statutes, this Agreement shall govern even when inconsistent with, or different from, the provisions of any applicable law or rule. To the extent any provision of this Agreement is prohibited or otherwise ineffective under the Statutes, such provision shall be considered to be ineffective to the smallest degree possible in order to make this Agreement effective under the Statutes.

Subject to the limitations on transferability set forth above, this Agreement shall be binding upon and inure to the benefit of the parties hereto and to their respective heirs, executors, administrators, successors and assigns.

No provision of this Agreement is intended to be for the benefit of or enforceable by any third party.

IN WITNESS WHEREOF, the Member(s) have executed this Agreement on March 15th 2018.

The Member(s) of Evergreen Strategies



Anthony Parrinello



The Commonwealth of Massachusetts William Francis Galvin

Minimum Fee: \$500.00

Secretary of the Commonwealth, Corporations Division
One Ashburton Place, 17th floor
Boston, MA 02108-1512
Telephone: (617) 727-9640

[Special Filing Instructions](#)

Certificate of Organization

(General Laws, Chapter)

Identification Number: 0013177291. The exact name of the limited liability company is: EVERGREEN STRATEGIES LLC

2a. Location of its principal office:

No. and Street: 52 WHISPERING WAYCity or Town: STOW State: MA Zip: 01775 Country: USA

2b. Street address of the office in the Commonwealth at which the records will be maintained:

No. and Street: 52 WHISPERINGCity or Town: STOW State: MA Zip: 01775 Country: USA

3. The general character of business, and if the limited liability company is organized to render professional service, the service to be rendered:

THE GENERAL CHARACTER OF THE BUSINESS OF THE LLC IS TO PROVIDE CONSULTING SERVICES AND ENGAGE IN ANY OTHER BUSINESS WHICH A LLC MAY BE AUTHORIZED TO ENGAGE UNDER THE MASSACHUSETTS LIMITED LIABILITY ACT.

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:

Name: ANTHONY PARRINELLONo. and Street: 52 WHISPERING WAYCity or Town: STOW State: MA Zip: 01775 Country: USA

I, ANTHONY PARRINELLO resident agent of the above limited liability company, consent to my appointment as the resident agent of the above limited liability company pursuant to G. L. Chapter 156C Section 12.

6. The name and business address of each manager, if any:

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
MANAGER	ANTHONY LAWRENCE PARRINELLO	52 WHISPERING WAY STOW, MA 01775 USA

7. The name and business address of the person(s) in addition to the manager(s), authorized to execute documents to be filed with the Corporations Division, and at least one person shall be named if there are no managers.

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code

SOC SIGNATORY

ANTHONY LAWRENCE PARRINELLO

52 WHISPERING WAY
STOW, MA 01775 USA

8. The name and business address of the person(s) authorized to execute, acknowledge, deliver and record any recordable instrument purporting to affect an interest in real property:

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
REAL PROPERTY	ANTHONY LAWRENCE PARRINELLO	52 WHISPERING WAY STOW, MA 01775 USA

9. Additional matters:

SIGNED UNDER THE PENALTIES OF PERJURY, this 15 Day of March, 2018,
ANTHONY PARRINELLO

(The certificate must be signed by the person forming the LLC.)

THE COMMONWEALTH OF MASSACHUSETTS

I hereby certify that, upon examination of this document, duly submitted to me, it appears that the provisions of the General Laws relative to corporations have been complied with, and I hereby approve said articles; and the filing fee having been paid, said articles are deemed to have been filed with me on:

March 15, 2018 09:01 PM

A handwritten signature in black ink, reading "William Francis Galvin". The signature is written in a cursive, flowing style with a large initial 'W' and 'G'.

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth



Commonwealth of Massachusetts
Department of Revenue
Geoffrey E. Snyder, Commissioner

mass.gov/dor

Letter ID: L1875995712
Notice Date: April 8, 2020
Case ID: 0-000-704-760



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



EVERGREEN STRATEGIES LLC
52 WHISPERING WAY
STOW MA 01775-4502

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, EVERGREEN STRATEGIES LLC 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) 887-6400 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

LIMITED LIABILITY CORPORATION
CERTIFICATE

April 10, 2020

The undersigned certifies that Evergreen Strategies, LLC. ("Company") is a Massachusetts Limited Liability Corporation, and further certifies the following:

1. The Company has not, and is not yet, producing goods, delivering services, and/or otherwise operating, pending approval of its licensing request to the CCC.
2. The Company has not hired, and is not yet hiring, any employees.
3. Anthony Parrinello owns one hundred percent (100%) of the interest of the Company.
4. Anthony Parrinello is, and since the date of organization of the Company has been, the only Member of the Company.
5. The Company has not engaged in any active business operations, pending approval of the Company's license request from the CCC.
6. The Company has not paid any person(s) as employees for services.
7. Anthony Parrinello is not and has never been an employee of the Company.
8. As the Company has no employees, it has not registered with the Department of Unemployment Assistance (the "Department").
9. The Company shall register with the Department prior to, and upon hiring and employing, any employees of the Company.

WITNESS the signature of the undersigned as of the date first set forth above. A facsimile, portable document form (PDF) and/or otherwise electronic signature to this Certificate will be given the same force and effect as an original.

Evergreen Strategies, LLC.

By: Anthony Parrinello
Evergreen Strategies, LLC., by its Owner,
Anthony Parrinello

Evergreen Strategies Plan for Obtaining Liability Insurance

Purpose

The purpose of this plan is to outline how Evergreen Strategies will obtain and maintain the required General Liability and Product Liability insurance coverage as required pursuant to 935 CMR 500.105(10), or otherwise comply with this requirement.

Research

Evergreen Strategies has an existing business relationship with an insurance broker (currently operating in the legal marijuana industry) that offers General and Product Liability Insurance coverage in the amounts required in 935 CMR 500.105(10).

Plan

1. Once Evergreen Strategies receives its Provisional Marijuana Establishment License we will engage with our insurance broker. The Evergreen Strategies executive management team has extensive experience in sourcing insurance for state regulated marijuana businesses in the past.
 - a. Evergreen Strategies will obtain and maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually.
 - b. The deductible for each policy will be no higher than \$5,000 per occurrence.
2. In the event that Evergreen Strategies cannot obtain the required insurance coverage, Evergreen Strategies will place a minimum of \$250,000 in an escrow account. These funds will be used solely for the coverage of liabilities.
 - a. Evergreen Strategies will replenish this account within ten business days of any expenditure.
3. Evergreen Strategies will maintain reports documenting compliance with 935 CMR 500.105(10) in a manner and form determined by the Commission and make these reports available to the Commission up request.

Executive Summary

Evergreen Strategies LLC is engaged in the business of cultivating high grade cannabis, manufacturing products derived from cannabis cultivation, and distributing such products to adult use consumers in regulated market of Massachusetts. Evergreen exists to provide high-quality and consistent cannabis-based products to consumers. Evergreen's business focuses on regulatory compliance while working to develop condition-specific strains of cannabis and non-invasive delivery methods (alternatives to smoke inhalation) to provide controlled-dosage medicinal cannabis relief to qualified patients and consumers in legalized cannabis markets. The Company will operate three adult-use dispensaries and a cultivation and product manufacturing facility in Massachusetts. The Company's objective is to capitalize on the opportunities presented as a result of the changing regulatory environment governing the cannabis industry in the United States. Evergreen Strategies is a Massachusetts LLC

Operations

Evergreen will operate three adult-use dispensaries in Worcester, Belchertown and North Adams Massachusetts. Its cultivation and product manufacturing facility will be located in West Boylston MA.

Management Team

Evergreen's management team is comprised of individuals with extensive experience operating in the Massachusetts' regulated market with specific expertise in management, compliance, operations, cultivation, Consumer Packaged Goods marketing and corporate training and development.

Financial Plan

Evergreen's projections are in line with published CCC retail sales data for years 1-2 and include substantive pricing degradation in years 3-5 to reflect anticipated substantial growth in capacity and product supply. Evergreen's pricing algorithms are based on existing market data, consumer behaviors and data from other more developed regulated cannabis markets.

Sales and Marketing Plans

Evergreen is focused on the continuous development of products and experiences that advance the science of cannabis. Evergreen believes that the product development is geared towards the wellness market. All marketing programs will comply with local and state regulations and rules.

Evergreen Strategies Restricting Access to Age 21 and Older Policy and Procedure Summary

Evergreen Strategies, LLC. operations will be compliant with all regulations outlined in 935 CMR 500.000 et. seq. (“the Regulations”) and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission (“CNB”) or any other regulatory agency.

The purpose of this policy is to outline the responsibilities of the Company, the Company’s management team and Agents to ensure specific, methodical, and consistent compliance of the Regulations and to ensure that access to our facility is restricted to only persons who are 21 years of age or older.

Evergreen Strategies management team is responsible for ensuring that all persons who enter the facility or are otherwise associated with the operations of the facility are over the age of 21.

Definitions

Law Enforcement Authorities means local law enforcement unless otherwise indicated.

Marijuana Establishment Agent means a board member, director, employee, executive, manager, or volunteer of a Marijuana Establishment, who is **21 years of age or older**. Employee includes a consultant or contractor who provides on-site services to a Marijuana Establishment related to the cultivation, harvesting, preparation, packaging, storage, testing, or dispensing of marijuana.

Visitor means an individual, other than a Marijuana Establishment Agent authorized by the Marijuana Establishment, on the premises of an establishment for a purpose related to its operations and consistent with the objectives of St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000, provided, however, that **no such individual shall be younger than 21 years old**.

Access to the Facility

The Evergreen Strategies facility allows only the following individuals access to our facility. For the purposes of this Policy the term “facility” also refers to any vehicle owned, leased, rented or otherwise used by Evergreen Strategies, LLC. for the transportation of Marijuana:

1. Evergreen Strategies Agents (including board members, directors, employees, executives, managers, or volunteers) must have a valid Agent Registration Card issued by the Commission and all of Evergreen Strategies Agents will be verified to be 21 years of age or older prior to being issued a Marijuana Establishment Agent card.
2. All Evergreen Strategies visitors (including outside vendors and contractors) prior to being allowed access to the facility or any Limited Access Area must produce a Government issued Identification Card to a member of the management team and have their age verified to be 21 years of age or older. If there is any question as to the visitors age, or if the visitor cannot produce a Government Issued Identification Card, they will not be granted access. After the age of the

visitor has been verified, they will be given a Visitor Identification Badge. Visitors will always be escorted by a marijuana establishment agent authorized to enter the limited access area. Visitors will be logged in and out of the facility and must return the Visitor Identification Badge upon exiting the facility. The visitor log will always be available for inspection by the Commission.

3. Evergreen Strategies will ensure that access to the Marijuana Establishment or Marijuana Establishment transportation vehicle will consist of the following:
 - a. Agents of the Commission;
 - b. Commission Delegees;
 - c. State and Local Law enforcement Authorities acting within their lawful jurisdictions;
 - d. Police and Fire departments, and emergency medical services acting in the course of their official capacity.

These individuals described above will be granted immediate access to the facility.

Policy for Separating Recreational from Medical Operations

Application # MCN281368

Not Applicable

Evergreen Strategies is not a Medical Marijuana Treatment Center

Evergreen Strategies Quality Control and Testing SOP

Evergreen Strategies is committed to being compliant with all regulations outlined in 935 CMR 500.000 et. seq. (“the Regulations”) and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission (“CNB”) or any other regulatory agency. This policy has been created to provide clear and concise instructions for all our employees to maintain Quality Control and Testing procedures that are in compliance with the Regulations.

Definitions

Cultivation Batch means a collection of cannabis or marijuana plants from the same seed or plant stock that are cultivated and harvested together, and receive an identical propagation and cultivation treatment including, but not limited to: growing media, ambient conditions, watering and light regimes and agricultural or hydroponic inputs. Clones that come from the same plant are one batch. The marijuana licensee shall assign and record a unique, sequential alphanumeric identifier to each cultivation batch for the purposes of production tracking, product labeling and product recalls.

Independent Testing Laboratory means a laboratory that is licensed by the Commission and is:

- (a) Accredited to the International Organization for Standardization 17025 (ISO/IEC 17025: 2017) by a third-party accrediting body that is a signatory to the International Laboratory Accreditation Accrediting Cooperation mutual recognition arrangement or that is otherwise approved by the Commission;
- (b) Independent financially from any Medical Marijuana Treatment Center (RMD), Marijuana Establishment or licensee for which it conducts a test; and
- (c) Qualified to test cannabis or marijuana in compliance with 935 CMR 500.160 and M.G.L. c. 94C, § 34.

Marijuana means all parts of any plant of the genus Cannabis, not excepted in (a) through (c) and whether growing or not; the seeds thereof; and resin extracted from any part of the plant; clones of the plant; and every compound, manufacture, salt, derivative, mixture or preparation of the plant, its seeds or resin including tetrahydrocannabinol as defined in M.G.L. c. 94G, § 1; provided that cannabis shall not include:

- (a) the mature stalks of the plant, fiber produced from the stalks, oil, or cake made from the seeds of the plant, any other compound, manufacture, salt, derivative, mixture or preparation of the mature stalks, fiber, oil, or cake made from the seeds of the plant or the sterilized seed of the plant that is incapable of germination;
- (b) hemp; or

(c) the weight of any other ingredient combined with cannabis or marijuana to prepare topical or oral administrations, food, drink or other products.

Marijuana Products means cannabis or marijuana and its products unless otherwise indicated. These include products have been manufactured and contain cannabis or marijuana or an extract from cannabis or marijuana, including concentrated forms of marijuana and products composed of marijuana and other ingredients that are intended for use or consumption, including edible products, beverages, topical products, ointments, oils and tinctures.

Process or Processing means to harvest, dry, cure, trim and separate parts of the cannabis or marijuana plant by manual or mechanical means, except it shall not include manufacture as defined in 935 CMR 500.002.

Production Batch means a batch of finished plant material, cannabis resin, cannabis concentrate or marijuana-infused product made at the same time, using the same methods, equipment and ingredients. The licensee shall assign and record a unique, sequential alphanumeric identifier to each production batch for the purposes of production tracking, product labeling and product recalls. All production batches shall be traceable to one or more cannabis or marijuana cultivation batches.

Evergreen Strategies is committed to cultivating healthy, high quality, and disease-free marijuana. Contaminants such as mold, fungus, bacterial diseases, rot, pests, pesticides not in compliance with 500.120(5) for use on marijuana and mildew are the biggest threat to a marijuana cultivation facility and its products. Evergreen Strategies is committed to utilizing Best Management Practices (“BMP”) for the prevention and treatment of possible contaminants using the safest and least invasive means.

Evergreen Strategies will also implement an industry standard Integrated Pest Management (“IPM”) program focusing on preventing pest problems. Preventing pest problems in our cultivation facility will entail minimizing pest access to the facility and the food and shelter available to it. Consequently, IPM relies heavily on the cooperation and participation of all employees. Also, quality control and the testing of marijuana products are essential for the operation of Evergreen Strategies’ cultivation facility. Evergreen Strategies will utilize best industry practices when it comes to quality control and product testing.

Quality Control will be maintained through the strict adherence to Good Manufacturing Practices and compliance with 935 CMR 500.000 et. seq, 105 CMR 590.000: *Minimum Sanitation Standards for Food Establishments*, the sanitation requirement in 105 CMR 500.000: *Good Manufacturing Practices for Food*, and with the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine*.

All products that Evergreen Strategies will sell or transfer to other Marijuana Establishment will be tested in accordance with the regulations and this policy. Evergreen Strategies will not sell or otherwise market marijuana for adult use that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. Any testing results indicating noncompliance with M.G.L. c.132B and the regulations at 333 CMR 2.00 through 333 CMR 14.00 will be immediately reported to the Commission, who may refer any such result to the Massachusetts Department of Agricultural Resources.

Energy and Efficiency

Evergreen Strategies will satisfy minimum energy efficiency and equipment standards established by the Commission and meet all applicable environmental laws, regulations, permits and other applicable

approvals, including those related to water quality and solid and hazardous waste management, prior to obtaining a final license under 935 CMR 500.103(2). Evergreen Strategies will adopt and use additional best management practices as determined by the Commission, in consultation with the working group established under section 78(b) of St. 2017, c. 55, to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts, and shall provide energy and water usage reporting to the Commission in a form determined by the Commission. These energy efficiency and equipment standards include:

1. The building envelope for our facility will meet minimum Massachusetts Building Code requirements and all Massachusetts amendments (780 CMR: *State Building Code*), International Energy Conservation Code (IECC) Section C.402 or The American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) Chapters 5.4 and 5.5 as applied or incorporated by reference in 780 CMR: *State Building Code*, except that facilities using existing buildings may demonstrate compliance by showing that the envelope insulation complies with code minimum standards for Type Factory Industrial F-1, as further defined in guidelines issued by the Commission.
2. The Lighting Power Densities (LPD) for our cultivation space will not exceed an average of 36 watts per gross square foot of active and growing space canopy, unless otherwise determined in guidelines issued by the Commission.
3. Our Heating Ventilation and Air Condition (HVAC) and dehumidification systems will meet Massachusetts Building Code requirements and all Massachusetts amendments (780 CMR: *State Building Code*), IECC Section C.403 or ASHRAE Chapter 6 as applied or incorporated by reference in (780 CMR: *State Building Code*).
 - a. Evergreen Strategies will provide documentation required under 935 CMR 500.120(11)(b), that includes a certification from a Massachusetts Licensed Mechanical Engineer that the HVAC and dehumidification systems meet Massachusetts building code as specified in this 935 CMR 500.120(11)(c) and that such systems have been evaluated and sized for the anticipated loads of the facility.
4. We will establish documented safety protocols to protect workers and consumers (e.g., eye protection near operating grow light).
5. Evergreen Strategies understands and acknowledges that the Commission may further define these standards, or create reasonable exemptions or modifications, through guidelines issued in consultation with the energy and environmental standards working group established under St. 2017, c. 55, § 78(b), including but not limited to provisions for greenhouses and agricultural buildings.

Best Management Practices for Pest Management

1. Our facility is designed and maintained to prevent introduction and spread of pests.
 - a. Evergreen Strategies uses enclosed cultivation and processing operations which are equipped with adequate ventilation, drainage, lighting and temperature controls to maintain optimal conditions for good plant growth while discouraging pests and plant disease.

- b. The Evergreen Strategies, Cultivation and Processing Facility and operations are designed to permit isolation and sanitation processes necessary to restrict introduction, establishment and spread of pests and plant diseases and permit their management while promoting good plant health and worker safety.
 - c. Post-harvest handling facilities are designed and operated to prevent contamination of product by mold, bacteria, viruses, chemicals or other contaminants.
 - d. Our facility provides adequate hand-washing facilities for workers.
- 2. Sanitation protocols to prevent the spread of pests within the facility by workers.
 - a. Evergreen Strategies has developed site-specific pest-preventive protocols for each section of every facility.
 - b. We place emphasis on starting with pest-free plant material.
 - c. We do not allow smoking in the facility.
 - d. We ensure all workers utilize appropriate sanitation protocols.
 - e. We ensure all workers receive adequate training.
- 3. Evergreen Strategies provides optimal growing conditions to promote healthy plant growth, encourage natural enemies and minimize pest-conducive conditions.
 - a. The Evergreen Strategies facility's ventilation, lighting and heating systems allow us to control and optimize humidity, temperatures and patterns of air movement to support plant growth and natural enemies while discouraging establishment, growth and spread of pests.
 - b. Our cultivation team will provide proper plant nutrition and pH to support optimal plant growth while discouraging pests.
 - c. We will maintain optimal moisture level in growing medium.
 - d. We will provide optimal plant spacing to prevent pest movement among plants and to allow adequate air circulation.
 - e. We will keep facilities free of weeds, plant debris, pest harborage, mold, mildew and algae.
- 4. Our cultivation team has developed effective procedures to regularly and systematically monitor for pests.
 - a. We have site-specific pest monitoring protocols for each room in the facility.
 - b. We will train all employees in all pest prevention, detection, identification, monitoring and record-keeping protocols.
 - c. Identify unknown insect and disease problems.
- 5. We have developed and will utilize an integrated pest management plan that includes least-risk protocols for preventing and managing common pests.

- a. Evergreen Strategies utilizes site-specific comprehensive integrated pest management protocols for each room of each facility.
6. Evergreen Strategies will keep thorough cultivation, pest monitoring and pest management records including:
 - a. Detailed records of all pest monitoring and scouting activities. At a minimum record date, numbers of each pest per unit of measure observed, numbers of beneficial organisms observed, amount of pest-caused damage observed, monitoring methods used, and specific locations of pest activity observed.
 - b. Detailed records of all non-pesticide actions taken to prevent or treat the crop for disease, insect, mite or other pest issues including but not limited to detailed records on any use of beneficial organisms.
 - c. Detailed records of all other substances applied to the plants, to the growing media or to the space or surfaces of the facility.
 - d. Detailed records of all fertilizers and soil amendments used in cultivation.
 - e. Information about water sources and equipment used in irrigation systems, as well as records of all tests performed to monitor water supplies used in irrigation and any records that establish conformity to any applicable water-use regulations.
 - f. Cultivation operations will maintain the following records
 - i. Nutrients used during cultivation;
 - ii. Detailed records of all other substances applied to the plant(s) surface or used as a fumigant in the cultivation area;

Detailed records of any other substances used during cultivation that may result in a residue on cannabis.

Quality Control – Sanitation Standard Operating Procedure (SOP)

Facility

Evergreen Strategies facility (“the facility”) will be designed and constructed with safe food handling and sanitation in mind. All equipment in the facility will comply with the design and construction standards of appropriate nationally recognized standards and/or code requirements and bear the certification mark of an ANSI accredited organization (e.g. NSF, UL, ETL).

1. All product contact surfaces will be smooth, durable and easily cleanable. The walls, ceiling and floors of all cultivation, processing and storage areas will be constructed of materials that are smooth, durable and can be adequately kept clean and in good repair. There must be coving at base junctures that is compatible with both wall and floor coverings. The coving should provide at least 1/4-inch radius and 4" in height.
2. The facility will provide sufficient space for the placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations and the production of safe marijuana products.

3. Floor drains and floors are effectively sloped and designed prevent pooling water. Drains have proper grating to prevent blockage and stopping of drains.
4. Overhead fixtures, ducts and pipes are designed as to prevent drips or condensate from potential contamination of marijuana products or marijuana products-packaging materials. Piping and conduit is at least 25 mm (2.5 cm) from the walls and ceilings.
5. Aisles or working spaces are provided between equipment and walls and are adequately unobstructed and of adequate width to permit employees to perform their duties and to protect against contaminating infused or marijuana products or infused or marijuana products- contact surfaces with clothing or personal contact.
6. Lighting and light fittings will be shatter-proof or safety-type light bulbs, fixtures, or other glass is used where lighting is suspended over cultivation, processing or storage areas or otherwise protect against marijuana product contamination in case of glass breakage. Suspended lighting is constructed from non- corrodible and cleanable assemblies. Adequate lighting will be installed in hand-washing areas, dressing and locker rooms, and toilet rooms and in all areas where infused or marijuana products are examined, processed, or stored and where equipment or utensils are cleaned. All light bulbs used in the production, processing and storage areas are shatterproof and/or protected with plastic covers. Evergreen Strategies will ensure adequate safety lighting in all production, processing and storage areas, as well as areas where equipment or utensils are cleaned.
7. Buildings, fixtures, and other physical facilities will be constructed in such a manner that allow them to be maintained in a sanitary condition.
8. Adequate ventilation or control equipment will be installed to minimize odors and vapors (including steam and noxious fumes) in areas where they may contaminate marijuana products. Fans and other air-blowing equipment shall be operated in a manner that minimizes the potential for contaminating infused or marijuana products, infused or marijuana products-packaging materials, and infused or marijuana products-contact surfaces.
9. Handwashing facilities will be adequate and convenient and shall be furnished with running water at a suitable temperature. Handwashing will be located in all production and processing areas and where good sanitary practices require employees to wash and sanitize their hands. Evergreen Strategies will provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices.
10. The facility water supply comes from the Town of West Boylston municipal water supply and is sufficient for necessary operations. The facilities plumbing will be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the facility. Plumbing shall properly convey sewage and liquid disposable waste from the facility. There will be no cross-connections between the potable and wastewater lines. The facility will provide its employees with adequate, readily accessible toilet facilities that will be maintained in a sanitary condition and in good repair.
11. All storage areas will be constructed in a manner that will protect its contents against physical, chemical, and microbial contamination as well as against deterioration of marijuana products or their containers.

Contamination Control

1. All entrance and exit doors to the facility will be self-closing and rodent proof. Air curtains will prevent insects and microbial contaminants from entering the building when doors are in use. Insect screening, HEPA, and carbon filters will prevent pest and microbial contaminants from entering through vents and exhaust from the outside. Foot baths and sticky mats are strategically placed thru out the facility to collect pest and contaminants from foot ware.
2. Employee and visitor gowning will be required. Employees are required to change out of their street clothes and footwear into uniforms and footwear dedicated to the facility. Visitors are required to secure personal belongings and done jump suits and disposable boot covers.
3. Training: All employees will be trained on pest prevention, pest management, pest detection, and pest treatments.
4. Traps for monitoring: Small sticky traps for monitoring of flying or airborne pest shall be posted, mapped and levels of any pest monitored/documented.
5. Handling and storage of marijuana product or marijuana plant waste: All marijuana plant waste will be placed in the "Marijuana Waste" container located in each cultivation and processing area. This container must be impervious and covered at all times. At the end of every day, the "Marijuana Waste" container must be emptied, and the contents transferred to the Marijuana Waste Room. All plant waste will be stored in the waste room in sealed containers until disposal.
6. All non-marijuana waste will be placed into the appropriate impervious covered waste receptacles; Recyclable, Organic and Solid Waste. At the end of every day these containers will be emptied, and the contents removed from the building and placed in the appropriate containers to await pickup.
7. All toxic materials including cleaning compounds, pesticides, sanitizers, etc. will be stored in an area away from production, processing and storage areas.

Sanitation

All marijuana products will be prepared, handled, and stored in compliance with;

- The sanitation requirements in 105 CMR 500.000: *Good Manufacturing Practices for Food*;
 - The sanitation requirements in 105 CMR 590.000: *Minimum Sanitation Standards for Food Establishments*; and
 - The requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*
1. Storage- Separate storage rooms will be utilized for finished marijuana products.
 2. Hand Washing- The facility will have a separate handwashing sink; hand drying device, or disposable towels; supply of hand cleaning agent; and waste receptacle for each processing, production, utensil washing area, and toilet room.
 - a. Sinks used for product preparation or for washing equipment or utensils shall not be used for handwashing.

- b. Each handwashing sink will be provided with hot and cold water tempered by means of a mixing valve or a combination faucet to provide water at a temperature of at least 110 degrees Fahrenheit.
 - c. Handwashing sinks will be of sufficient number and conveniently located for use by all employees in the production, processing and utensil washing areas. Handwashing sinks will be easily accessible and may not be used for purposes other than handwashing.
- 3. Toilet Room- A toilet room shall be available for use by all workers. Ventilation will be provided by mechanical means. A soap dispenser and disposable towels shall be provided for hand washing in toilet rooms.
- 4. Manual Cleaning and Sanitizing- For manual cleaning and sanitizing of equipment and utensils, a stainless steel three-compartment sink will be used.
 - a. The sink compartments shall be large enough to hold the largest pot, pan or piece of equipment.
 - b. Each compartment will be supplied with adequate hot and cold potable running water.
 - c. Integral drainboards of adequate size shall be provided on both sides of the sink for cleaned and soiled utensils.
 - d. A floor drain will be located in the immediate vicinity of the sink in areas where wet pots, utensils and equipment are air-drying.
 - e. Stainless Steel racks, shelves or dish tables are to be provided adjacent to the warewash sink.
 - f. An approved chemical test kit for determining sanitizer strength will be available and used.
 - g. Manual Warewashing Procedure
 - i. Rinse, scrape, or soak all items before washing.
 - ii. Record the date, sanitizer water temperature or test strip results, and initial record on Manual Warewashing Monitoring Form.
 - iii. Wash items in the first sink in a detergent solution. Water temperature should be at least 110°F. Use a brush, cloth, or scrubber to loosen remaining soil. Replace detergent solution when suds are gone or water is dirty.
 - iv. Immerse or spray-rinse items in second sink. Water temperature should be at least 110°F. Remove all traces of food and detergent. If using immersion method, replace water when it becomes cloudy, dirty, or sudsy.
 - v. Immerse items in third sink filled with hot water or a chemical-sanitizing solution.
 - 1. If hot water immersion is used, the water temperature must be at least 180°F. Items must be immersed for 30 seconds. Proper personal protective equipment should be worn.

2. If chemical sanitizing is used, the sanitizer must be mixed at the proper concentration. (Check at regular intervals with a test kit.) Water must be correct temperature for the sanitizer used.
 - a. The strength of the sanitizer must be measured in accordance with manufacturer's instructions.
- vi. To avoid recontamination of clean and sanitary items:
 1. Air dry all items on a drainboard.
 2. Wash hands prior to returning to storage.

Warewashing Sink Setup

WASH	RINSE	SANITIZE
110°F	110°F	180°F or
Soapy Water	Clear Water	Chemical Sanitizer

Chemical Solution	Concentration Level	Minimum Temperature	Minimum Immersion Time
Chlorine Solution	25mg/l minimum	120°F	10 seconds
	50mg/l minimum	100°F	10 seconds
	100mg/l minimum	55°F	10 seconds
Iodine Solution	12.5-25.0mg/l	75°F	30 seconds
Quaternary Ammonium Solution	200 ppm maximum	75°F	30 seconds

- h. Equipment Cleaning and Sanitizing Procedure
 - i. Disassemble removable parts from equipment.
 - ii. Use the three-sink method to wash, rinse, and sanitize all parts. Verify sanitizer concentration for each meal period and as necessary per policy.
 1. Quaternary ammonia –200 ppm and immerse for 30 seconds
 2. Iodine –12.5-25.0 ppm and immerse for 30 seconds
 3. Chlorine –50-99ppm and immerse for 7 seconds
 - iii. Wash, rinse, and sanitize all food contact surfaces of the equipment that are stationary.
 - iv. Allow all parts of the equipment to air dry.

- v. After being rinsed and sanitized, equipment and utensils should not be rinsed before air-drying, unless the rinse is applied directly from a ware washing Machine or the sanitizing solution calls for rinsing off the sanitizer after it has been applied in a commercial ware washing Machine.
- vi. Re-assemble the equipment.
- i. Product Preparation Surfaces- These surfaces will be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions.
 - i. Prescrape surface to remove gross soils.
 - ii. Wash surface with recommended strength solution of pot & pan detergent.
 - iii. Rinse with water and wipe dry.
 - iv. Using trigger sprayer bottle and a different wiping cloth, apply sanitizing solution of sanitizer.
 - 1. Per label directions, use appropriate test papers to determine correct concentration of the sanitizer solution. Surfaces must remain wet for 60 seconds and allow to air dry.

Personnel

1. Any employee or contractor who, by medical examination or supervisory observation, is shown to have, or appears to have, any disease transmissible through food, an illness, open lesion, including boils, sores, or infected wounds, or any other abnormal source of microbial contamination by which there is a reasonable possibility of marijuana products, production or processing surfaces, or packaging materials becoming contaminated, shall be excluded from any operations which may be expected to result in such contamination until the condition is corrected. Personnel shall be instructed to report such health conditions to their supervisors.
 - a. Any manager, when he or she knows or has reason to believe that an employee has contracted any disease transmissible through food or has become a carrier of such disease, or any disease listed in 105 CMR 300.200(A) will report the same immediately by email to the Board of Health.
 - b. Evergreen Strategies will voluntarily comply with any and all isolation and/or quarantine orders issued by the Board of Health or the Department of Public Health.
 - c. Evergreen Strategies Agents must report any flu-like symptoms, diarrhea, and/or vomiting to their supervisor. Employees with these symptoms will be sent home with the exception of symptoms from a noninfectious condition.
 - i. Agents may be re-assigned to activities so that there is no risk of transmitting a disease through food/product.
2. Evergreen Strategies Agents shall conform to sanitary practices while on duty, including
 - a. Maintain adequate personal cleanliness:

Grooming:

- i. Arrive at work clean – clean hair, teeth brushed, bathed and used deodorant daily.
- ii. Maintain short, clean, and polish-free fingernails. No artificial nails are permitted in the food/product production or processing area.
 - a. Fingernails should be trimmed, filed, and maintained so edges and surfaces are cleanable and not rough.
- iii. Wash hands (including under fingernails) and up to forearms vigorously and thoroughly with soap and warm water for a period of 20 seconds:
 - When entering the facility before work begins.
 - Immediately before preparing or processing products or handling equipment.
 - As often as necessary during cultivation or product preparation when contamination occurs.
 - In the restroom after toilet use and when you return to your work station.
 - When switching between working areas.
 - After touching face, nose, hair, or any other body part, and after sneezing or coughing.
 - After cleaning duties.
 - Between each task performed and before wearing disposable gloves.
 - After eating or drinking.
 - Any other time an unsanitary task has been performed – i.e. taking out garbage, handling cleaning chemicals, picking up a dropped item, etc.
 - a. Wash hands only in hand sinks designated for that purpose.
 - b. Dry hands with single use towels. Turn off faucets using a paper towel, in order to prevent recontamination of clean hands.

Proper Attire:

- i. Wear appropriate clothing – clean uniform with sWest Boylstonves and clean non-skid close-toed work shoes (or leather tennis shoes) that are comfortable for standing and working on floors that can be slippery.
- ii. Wear apron or lab coat on site, as appropriate.
 - Do not wear apron or lab coat to and from work.
 - Take off apron or lab coat before using the restroom.
 - Remove apron or lab coat when leaving the production or processing area.

- Change apron or lab coat if it becomes soiled or stained.
- iii. Wear disposable gloves with any cuts, sores, rashes, or lesions.
- iv. Wear gloves when handling products or product ingredients that will not be heated-treated.
- v. Wear gloves when packaging products.
- vi. Change disposable gloves as often as handwashing is required. Wash hands before donning and after discarding gloves.

Hair Restraints and Jewelry:

- i. Wear a hair net or bonnet in any food/product production or processing area so that all hair is completely covered.
- ii. Keep beards and mustaches neat and trimmed. Beard restraints are required in any food/product production or processing area.
- iii. Refrain from wearing jewelry in the food/product production and processing area.
 - Only a plain wedding band.
 - No necklaces, bracelets, or dangling jewelry are permitted.
 - No earrings or piercings that can be removed are permitted.

Cuts, Abrasions, and Burns:

- i. Bandage any cut, abrasion, or burn that has broken the skin.
- ii. Cover bandages on hands with gloves and finger cots and change as appropriate.
- iii. Inform supervisor of all wounds.

Smoking, eating, and gum chewing:

- i. Evergreen Strategies facility is a smoke free facility. No smoking or chewing tobacco shall occur on the premises.
- ii. Eat and drink in designated areas only. A closed beverage container may be used in the production area if the container is handled to prevent contamination of 1) the employee's hands, 2) the container, and 3) exposed product, clean equipment and utensils.
- iii. Refrain from chewing gum or eating candy during work in a food/product production or processing area.

HACCP- Hazard Analysis and Critical Control Point

Evergreen Strategies will implement a HACCP plan in accordance with *the HACCP Principles & Application Guidelines* issued by the FDA. This HACCP plan will address the processing, production and packaging of all marijuana products that Evergreen Strategies will manufacture. Once operational Evergreen Strategies will:

1. Assemble the HACCP team.
2. Describe the product and its distribution.
3. Describe the intended use and consumers of the product.
4. Develop a flow diagram which describes each process.
5. Verify the flow diagram.
6. Conduct a hazard analysis for each product (Principle 1).
7. Determine critical control points (CCPs) for each product (Principle 2).
8. Establish critical limits (Principle 3).
9. Establish monitoring procedures (Principle 4).
10. Establish corrective actions (Principle 5).
11. Establish verification procedures (Principle 6).
12. Establish record-keeping and documentation procedures (Principle 7).

Training

Evergreen Strategies will provide training and training opportunities to all of its employees. In addition to required training, Evergreen Strategies will encourage advanced training to all employees in the areas of Plant Safety, Safe Cultivation Processes, Good Manufacturing Practices and HACCP.

1. All employees will be trained on basic plant safety prior to or during the first day of employment.
 - a. Include basic product safety training as part of new employee orientation.
 - b. The sanitation requirements in 105 CMR 500.000: Good Manufacturing Practices for Food;
 - c. The sanitation requirements in 105 CMR 590.000: Minimum Sanitation Standards for Food Establishments; and
 - d. The requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements.
2. All employees engaging in the trimming or packaging will be trained and certified in;
 - a. A nationally accredited Food Handler Program (i.e. ServSafe)
3. Provide staff with at least bi-annual training on plant safety, Good Manufacturing Practices and HACCP.
4. Monthly in-service training.
5. Require all managers to be Certified Food Protection Managers (CFPM) by completing a SERVSAFE or similar nationally accredited food safety certification course.
6. Use outside resources, such as Extension specialists, vendors, health department inspectors, or qualified trainers to provide plant safety and HACCP training.

7. Observe staff to ensure they demonstrate plant safety knowledge each day in the workplace.
8. Document the content of all training sessions and attendance.
9. File documentation in HACCP records.

Testing of Marijuana and Marijuana Products

No marijuana product, including marijuana, may be sold or otherwise marketed for adult use that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. Testing of marijuana products shall be performed by an Independent Testing Laboratory in compliance with the protocol(s) established in accordance with M.G.L. c. 94G, § 15 and in a form and manner determined by the Commission, including but not limited to, the *Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products*. Testing of environmental media (e.g., soils, solid growing media, and water) shall be performed in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries* published by the Commission.

Testing of environmental media (e.g., soils, solid growing media, and water) shall be performed in compliance with the “*Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries*” published by the Commission.

Evergreen Strategies will contract with a Licensed Independent Testing Laboratory to test all marijuana batches prior to packaging to ensure contaminant-free purity and correct dosage and potency. We have begun discussions with several Marijuana Testing laboratories which are Accredited to International Organization for Standardization (ISO) 17025 by a third-party accrediting body that is a signatory to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement. Any Laboratory that Evergreen Strategies contracts with will be Licensed by the Commission prior to Evergreen Strategies contracting them for testing services.

1. This testing lab will pick up and transport our testing samples to and from their lab. This transportation will comply with Evergreen Strategies policies and procedures and 935 CMR 500.105(13) if applicable.
2. Evergreen Strategies will ensure that the storage of all marijuana products at the laboratory complies with 935 CMR 500.105(11).
3. Any and all excess Evergreen Strategies marijuana product samples used in testing will be disposed of in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to Evergreen Strategies facility for disposal or by the Independent Testing Laboratory disposing of it directly.

Evergreen Strategies will not sell or otherwise market for adult use any Marijuana Product that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. The product must be deemed to comply with the standards required under 935 CMR 500.160.

Pursuant to 935 CMR 500.130(4) Evergreen Strategies will provide documentation of our compliance, or lack thereof, with the testing requirements of 935 CMR 500.160, and standards established by the Commission for the conditions, including time and temperature controls, necessary to protect Marijuana Products against physical, chemical, and microbial contamination as well as against deterioration of

finished products during storage and transportation to all marijuana establishments that we sell or otherwise transfer marijuana to.

Required testing includes:

1. Cannabinoid Profile
2. Contaminants as specified by the Department including, but not limited to:
 - a. Mold
 - b. Mildew
 - c. Heavy metals
 - d. Plant-Growth Regulators and
 - e. Pesticides

Evergreen Strategies will maintain the results of all testing for no less than one year. All testing results shall be valid for one year.

All testing will be conducted in accordance with the frequency required by the Commission.

Policy for Responding to Laboratory Results that Indicate Contaminant Levels are Above Acceptable Limits

If a laboratory test result indicates that a Evergreen Strategies marijuana product sample has contaminant levels above the acceptable limits established in the DPH protocols identified in 935 CMR 500.160(1) – Evergreen Strategies will:

1. Immediately segregate the cultivation or production batch and evaluate next steps.
 - a. Using the flow chart below (*Actions in Response to Laboratory Analytical Results*), the Cultivation Manager and CEO will determine whether to:
 - i. Retest the Cultivation/Production Batch
 - ii. Remediate the Cultivation/Production Batch
 - iii. Dispose of Cultivation/Production Batch
2. If the test result indicates has a contaminant level for Pesticides that is above the acceptable limits the Production Batch will be immediately disposed of.
3. If it is determined that the Production Batch cannot be remediated, it will be disposed of.
 - a. Our Cultivation Manager or CEO will:
 - i. Notify the Commission within 72 hours of the laboratory testing results indicating that the contamination cannot be remediated and is being disposed of;
 - ii. Notify the Commission of any information regarding contamination as specified by the Commission or immediately upon request by the Commission
 - iii. This notification to the Commission will describe the proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

4. In the case of any test result that indicates that a Evergreen Strategies marijuana product sample has contaminant levels above the acceptable limits, the Cultivation Manager and CEO will conduct an assessment of the source of the contamination.
 - a. This extensive assessment will include investigating all possible sources of contamination including water, media, nutrients, environmental conditions and employee factors.
 - b. The assessment should include a corrective action plan and be shared as a training tool with all Evergreen Strategies Agents.
5. Marijuana and Marijuana Products submitted for retesting prior to remediation will be submitted to an Independent Testing Laboratory other than the laboratory which provided the initial failed result. Marijuana submitted for retesting after documented remediation may be submitted to the same Independent Testing Laboratory that produced the initial failed testing result prior to remediation.

Miscellaneous Marijuana Testing Requirements

1. Clones are subject to these testing provisions but are exempt from testing for metals.
2. All transportation of Marijuana to and from Independent Testing Laboratories providing Marijuana testing services will comply with 935 CMR 500.105(13).
3. All storage of Marijuana at a laboratory providing Marijuana testing services shall comply with 935 CMR 500.105(11).
4. All excess Marijuana must be disposed of in compliance with 935 CMR 500.105(12) by the Independent Testing Laboratory disposing of it directly.
5. Evergreen Strategies will not sell or otherwise market Marijuana or Marijuana Products for adult use that have not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160.
6. Single-servings of Marijuana Products tested for potency in accordance with 935 CMR 500.150(4)(a) are subject to a potency variance of no greater than plus/minus ten percent (+/- 10%).

Environmental Media Testing

1. All source soils and solids shall be sampled and analyzed prior to use in cultivation.
2. All source soils and solids shall be sampled and analyzed whenever a new source material is utilized (e.g., different source soil location or different source solid manufacturer).
3. All source soils and solids for initial use must be sampled at the rate of one (1) sample per cubic yard of solid environmental media/soil.
4. Source soils and solids passing initial testing requirements may be stockpiled for later use without requiring re-analysis unless;
 - a. The stockpile has been contaminated or altered while stored.
5. Situations for re-analysis may include but are not limited to soils that have been;
 - a. Amended;

- b. Mixed with other source soils/solids;
- c. Subject to pesticide application;
- d. Used for other purposes; or
- e. Inundated by flood waters.

Supplies Needed: Sample Form, Chain of Custody, Pen, Marker and Sample Container (provided by CDX Labs)

Sampling of Environmental Media for Testing

This procedure applies to all environmental media that is required to be tested in accordance with the Regulations.

Water will be sampled and analyzed prior to use for cultivation of marijuana and quarterly thereafter.

Quality assurance is responsible for all product sampling to meet the compliance criteria. Evergreen Strategies has contracted with NE Labs for the purposes of testing all of our environmental media and water. Follow the process outlined in the *"Sampling Instructions for Massachusetts DPH Medical Marijuana Program"* form below from NET Labs.

Supplies Needed: Sample Form, Chain of Custody, Pen, Marker, Ziploc bag

1. Label
 - a. Label each Ziploc bag with the sample ID, date and time of sampling, and sampler's initials.
2. Fill out the Chain of Custody
 - a. List the same info on the chain of custody
 - b. One sample ID goes on one line
 - c. Check the appropriate boxes
 - d. Make sure date and time stamp are filled in
3. Sampling
 - a. Fill the Ziploc sample bag with 8 oz. of soil/media
 - b. Tightly seal the sample bag
4. Storing Sample
 - a. Store samples in a cool, dry location until samples are picked up by a NET Lab courier.
5. Quality Assurance will perform routine audits and analysis of report from the testing lab.

VII. Sampling of Water for Testing

This procedure applies to all water that is required to be tested in accordance with the Regulations.

The Quality Assurance Manager is responsible for all water sampling to meet the compliance criteria. Evergreen Strategies has contracted with NE Labs for the purposes of testing all of our water. In compliance with the Regulations and the *“Protocol for sampling and analysis of environmental media for Massachusetts Registered Medical Marijuana Dispensaries”* Evergreen Strategies will sample and test its water supply prior to use for cultivation of marijuana and quarterly thereafter. Following the process outlined in the “Sampling Instructions for Marijuana Testing” form below from NE Labs.

Samples will be taken at the location closest to cultivation area prior to any water treatment and immediately following any treatment systems.

We will test our water for the following contaminants;

1. Metals;
2. Pesticides; and
3. Bacteriological

Collecting Water Samples

1. Samples should not be collected during any periods of unusual activity such as draining of water lines, immediately after changing treatment cartridges or replenishing of hydroponic nutrient solutions.
2. Prior to Sample Collection. The QA Manager or designee will assemble all equipment and information needed before beginning.
 - a. Items to assemble before sampling include, but are not limited to, the following:
 - i. Sample collection plan or diagram of locations to ensure representative sample collection
 - ii. Logbook or sample collection forms
 - iii. Chain-of-custody forms (COCs) (See below)
 - iv. Disposable gloves
 - v. Clean, decontaminated plastic sheeting or other clean, non-porous surface for sample processing;
 - vi. Sample containers appropriate for the analyses required;
 1. These will be supplied by the lab.
 - vii. Container labels and pen with indelible ink; and
 - viii. Supplies to thoroughly clean, decontaminate and dry sampling equipment between samples;
 - b. Sample collection personnel will create a new entry for each sampling event in the sample collection logbook.

- c. Sample collection documentation should identify the sample collection date and start time, participating personnel and locations sampled, relevant environmental conditions, a description of the sampling procedures and equipment decontamination/cleaning used.
 - d. Sample collection personnel shall identify or determine the number and location of water samples to be collected
 - i. Sample locations must be recorded in the sample collection logbook. Record the sample location identifier (location ID) for each sample so that it can be utilized to identify the physical location of the sample location within the facility.
 - ii. Location identifiers should be consistent across sampling events to allow tracking of repeated sample locations. The location IDs will be included on sample labels (unless the grab samples are used in a composite sample).
 - iii. In addition to the location ID, create a unique sample ID for each sample. Sample identifiers should be unique for a given sample event. Record the location and sample IDs in the sample collection logbook or forms as well as the volume of the sample, preservation, and associated sample containers.
 - e. Any tools that contact the samples should be made of stainless steel or other inert material to avoid potential contamination of the sample. In addition, all tools that come in contact with the sample media should be rinsed with deionized water between samples to reduce potential cross contamination.
 - f. Preparing sample labels and affixing them to sample containers immediately before sampling.
 - i. Information to include on the label includes at a minimum the location and sample ID and date/time of collection. Additional information that must be recorded in documentation if not on the label includes sample collector's name, environmental media type, collection method, whether the sample is a grab or composite sample, and preservation (if applicable).
3. Sample Collection. Collect the planned samples from each sample location one at a time:
- a. Don gloves to mitigate potential for contamination of samples.
 - b. Spread clean, decontaminated plastic sheeting or other nonporous surface near the sample location and lay out any tools and equipment needed.
 - c. Prepare the sample location by removing faucet aerators if connected. Note the location of any water treatment systems and remove if required to represent pre-treatment location.
 - d. For sample collection of water lines, purge the lines of standing water and note purge time in sample collection documentation. Generally, for frequently used water 15 minutes run time is considered sufficient but actual time for purge depends on pipe volume and frequency of use.

- e. Open the pre-labeled sample containers appropriate for the analyses taking care to not allow errant drips or splashes off other surfaces to enter the caps or containers.
- f. Samples for all analyses may be collected directly into sample containers or into a larger, inert vessel then poured into containers. During sample collection, make sure that the tap or spigot does not contact the sample container.
- g. 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.
- h. Samples should be refrigerated or maintained on ice until shipped to the analytical laboratory.
- i. Chain-of-custody paperwork should be completed immediately prior to shipment.

4. Sample Handling

- a. After samples are properly collected and labeled, they should be delivered for analysis as soon as possible. This section describes how to handle, securely store, package, and ship the samples to the laboratory.
- b. Sample containers both empty and once containing samples shall be stored in a contaminant-free environment to the degree possible. Sample containers should not be stored for more than one (1) year.
- c. All samples should be collected and stored in containers of the appropriate materials based on the analysis method being performed.
- d. Until the samples are analyzed, they should be preserved to minimize chemical or physical changes according to the analytical method references.

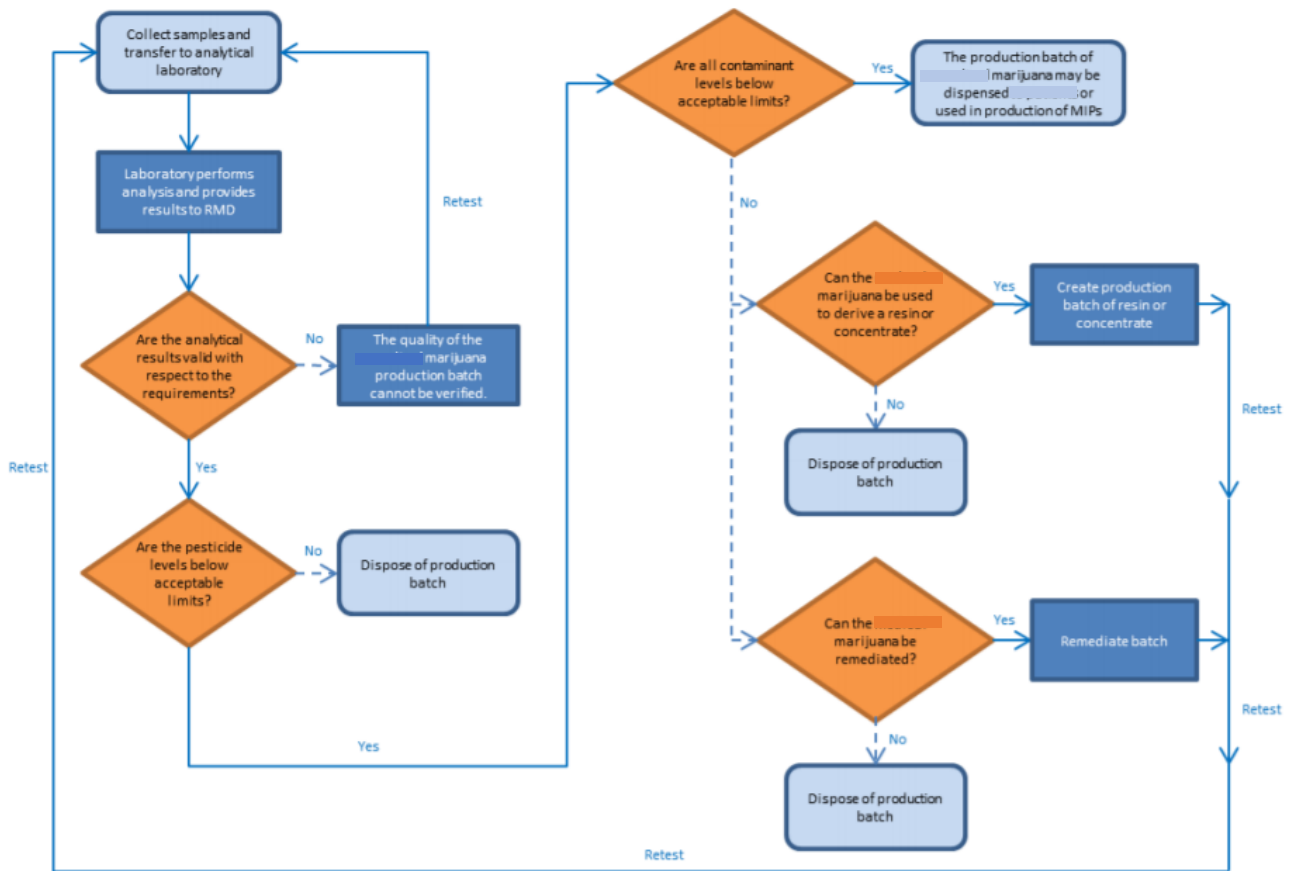
5. Sample Storage

- a. Samples should be refrigerated or maintained on ice ($4^{\circ}\text{C} \pm 2^{\circ}\text{C}$) until they are shipped to the analytical laboratory.
- b. Placing the samples in airtight containers with minimal headspace preserves samples by minimizing moisture loss and chemical exchange between the sample medium and air.
- c. In addition, protect the samples from excessive light exposure to minimize photochemical degradation. Samples can be protected from light by using an amber sample container, storing the samples in a closed box or other amber container, or in a dark storage location.
- d. To be considered valid, all samples must be analyzed prior to expiration of the technical holding time as defined in each analytical method. Note that the holding time for some biological components is very short; 24 to 48 hours from the time of collection.

Quality Control (QC)

1. Field duplicate samples shall be collected at least annually and one (1) for every twenty (20) field samples of the solid samples collected.
2. Field duplicate samples shall be collected and analyzed for each analytical method performed on the samples.
3. Field duplicate samples will not be identified to the laboratory (blind QC).

Actions in Response to Laboratory Analytical Results



Evergreen Strategies Record Keeping Procedure

Summary

Intent

To provide clear and concise instructions for Evergreen Strategies employees regarding record keeping that are compliant with the regulations.

Evergreen Strategies is committed to being compliant with all regulations outlined in 935 CMR 500.000 et. seq. ("the Regulations") and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission ("CNB" or "the Commission") or any other regulatory agency.

Purpose

The purpose of this policy is to outline the responsibilities of the Company, the Company's management team and agents to ensure specific, methodical, and consistent compliance of the regulations and to ensure that our record keeping procedures are compliant with all regulations and laws.

Access to the Commission

Evergreen Strategies electronic and hard copy (written) records will be available to the Commission upon request pursuant to 935 CMR 500.105(9). The records will be maintained in accordance with generally accepted accounting principles. All written records required in any section of 935 CMR 500.000 are subject to inspection.

Access to the Massachusetts Department of Revenue ("DOR")

Evergreen Strategies' books, records, papers and other data will be made available upon request by the DOR Accounting records and information in electronic format will be provided in a searchable electronic format if requested by the Commission of the DOR. Any additional reports and schedules relating to the preparation of tax returns will be maintained and made available upon request. Inventory system data as well as any additional purchase reports, schedules or documentation that reconcile to other books and records, such as purchase journals or a general ledger, will also be maintained and made available upon request.

These records will be kept so long as their contents are material in the administration of Massachusetts tax laws. At a minimum, unless the DOR Commissioner consents in writing to an earlier destruction, the records will be preserved until the statute of limitations for making additional assessments for the period for which the return was due has expired. The DOR may require a longer retention period, such as when the records are the subject of an audit, court case, or other proceeding.

Additionally, Evergreen Strategies will comply with all records retention requirements outlined in the DOR Regulations including but limited to 830 CMR 62C.25.1: Record Retention.

1. Point of Sale (POS) Systems (Retail Only)

Evergreen Strategies will utilize a POS system that complies with the requirements in G.L. c. 62C, § 25; 830 CMR 62C.25.1 (the Records Retention Regulation); and the Massachusetts Department of Revenue ("DOR") Directive 16-1 *"Recordkeeping Requirements for Sales and Use Tax Vendors Utilizing Point of Sale (POS) Systems"*

- a. Our POS system will record all transactions in a manner that will allow the DOR to verify what items were sold and confirm if the appropriate amount of tax was collected. In addition to the data in the POS system, Evergreen Strategies will maintain the following records:
 - i. A journal or its equivalent, which records daily all non-cash transactions affecting accounts payable;
 - ii. A cash journal or its equivalent, which records daily all cash receipts and cash disbursements, including any check transactions;
 - iii. A sales slip, invoice, cash register tape, or other document evidencing the original transaction, which substantiates each entry in the journal or cash journal;
 - iv. Memorandum accounts, records or lists concerning inventories, fixed assets or prepaid items, except in cases where the accounting system clearly records such information; and
 - v. A ledger to which totals from the journal, cash journal and other records have been periodically posted. The ledger must clearly classify the individual accounts receivable and payable and the capital account.
- b. Each POS transaction record will provide enough detail to independently determine the taxability of each sale and the amount of tax due and collected. Information on each sales transaction will include, but is not limited to the:
 - i. individual item(s) sold,
 - ii. selling price,
 - iii. tax due,
 - iv. invoice number,
 - v. date of sale,
 - vi. method of payment, and
 - vii. POS terminal number and POS transaction number.
- c. Evergreen Strategies will maintain auditable internal controls to ensure the accuracy and completeness of the transactions recorded in the POS system. The audit trail details include, but are not limited to:
 - i. Internal sequential transaction numbers;
 - ii. Records of all POS terminal activity; and
 - iii. Procedures to account for voids, cancellations, or other discrepancies in sequential numbering.
 - iv. The POS audit trail or logging functionality must be activated and operational at all times, and it must record:
 - v. Any and all activity related to other operating modes available in the system, such as a training mode; and
 - vi. Any and all changes in the setup of the system.

2. Types of Records

The following records will be maintained and stored by Evergreen Strategies and available to the Commission upon request:

- a. Operating procedures as required by 935 CMR 500.105(1)
 - i. Security measures in compliance with 935 CMR 500.110;
 - ii. Employee security policies, including personal safety and crime prevention techniques;
 - iii. A description of the Marijuana Establishment's hours of operation and after-hours contact information, which shall be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
 - iv. Storage of marijuana in compliance with 935 CMR 500.105(11);
 - v. Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold;
 - vi. Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);
 - vii. Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
 - viii. A staffing plan and staffing records in compliance with 935 CMR 500.105(9);
 - ix. Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
 - x. Alcohol, smoke, and drug-free workplace policies;
 - xi. A plan describing how confidential information will be maintained;
 - xii. A policy for the immediate dismissal of any marijuana establishment agent who has:
 - 1) Diverted marijuana, which shall be reported to law enforcement officials and to the Commission;
 - 2) Engaged in unsafe practices with regard to operation of the Marijuana Establishment, which shall be reported to the Commission; or
 - 3) Been convicted or entered 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.
 - xiii. A list of all board members and executives of a Marijuana Establishment, and members, if any, of the licensee must be made available upon request by any individual. 935 CMR This requirement may be fulfilled by placing this information on the Marijuana Establishment's website.
 - xiv. Policies and procedures for the handling of cash on Marijuana Establishment premises including but not limited to storage, collection frequency, and transport to financial institution(s).

- xv. Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.
- xvi. Policies and procedures for energy efficiency and conservation that shall include:
 - 1) Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;
 - 2) Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on the site, and an explanation of why the identified opportunities were not pursued, if applicable;
 - 3) Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
 - 4) Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants.
- b. Operating procedures as required by 935 CMR 500.12012)
 - i. Methods for identifying, recording, and reporting diversion, theft, or loss, and for correcting all errors and inaccuracies in inventories. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(8);
 - ii. Policies and procedures for handling voluntary and mandatory recalls of marijuana products. Such procedures shall be adequate to deal with recalls due to any action initiated at the request or order of the Commission, and any voluntary action by a Marijuana Establishment to remove defective or potentially defective marijuana products from the market, as well as any action undertaken to promote public health and safety;
 - iii. Policies and procedures for ensuring that any outdated, damaged, deteriorated, mislabeled, or contaminated marijuana products is segregated from other product and destroyed. Such procedures shall provide for written documentation of the disposition of the marijuana products. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(12);
 - iv. Policies and procedures for transportation. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(13);
 - v. Policies and procedures to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(15); and
 - vi. Policies and procedures for the transfer, acquisition, or sale of marijuana products between Marijuana Establishments.
- c. Inventory records as required by 935 CMR 500.105(8);
- d. Seed-to-sale tracking records for all marijuana products are required by 935 CMR 500.105(8)(e).
- e. Personnel records required by 935 CMR 500.105(9)(d), including but not limited to;
 - i. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;

- ii. A personnel record for each marijuana establishment agent. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and shall include, at a minimum, the following:
 - 1) All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
 - 2) Documentation of verification of references;
 - 3) The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision
 - 4) 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;
 - 5) Documentation of periodic performance evaluations;
 - 6) A record of any disciplinary action taken; and
 - 7) Notice of completed responsible vendor and eight-hour related duty training.
 - iii. A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
 - iv. Personnel policies and procedures; and
 - v. All background check reports obtained in accordance with 935 CMR 500.030
- f. Business records, which shall include manual or computerized records of:
 - i. Assets and liabilities;
 - ii. Monetary transactions;
 - iii. Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
 - iv. Sales records including the quantity, form, and cost of marijuana products; and
 - v. Salary and wages paid to each employee, stipend paid to each board member, and an executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the nonprofit corporation, if any.
- g. Waste disposal records as required under 935 CMR 500.105(12); and
- h. Following closure of a Marijuana Establishment, all records must be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission.
- i. Responsible vendor training program compliance records.
- j. Vehicle registration, inspection and insurance records. (If Applicable)

All records kept and maintained by Evergreen Strategies will be securely stored. Access to these records will only be granted to those Evergreen Strategies Agents who require access as a part of their job duties.

Evergreen Strategies Personnel and Background Check Policy Summary

Intent

To provide clear and concise instructions for Evergreen Strategies employees regarding Personnel Policies that are compliant with the regulations.

Evergreen Strategies is committed to being compliant with all regulations outlined in 935 CMR 500.000 et. seq. ("the Regulations") and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission ("CNB" or "the Commission") or any other regulatory agency.

Purpose

The purpose of this policy is to outline the responsibilities of the company, the company's management team and agents to ensure specific, methodical, and consistent compliance of the regulations and to ensure that our personnel policies are compliant with all relevant regulations and laws.

Personnel Records

Evergreen Strategies will maintain the following information in personnel records:

1. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
2. A personnel record for each Evergreen Strategies agent. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with Evergreen Strategies and shall include, at a minimum, the following:
 - a. All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
 - b. Documentation of verification of references;
 - c. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
 - d. 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;
 - e. Documentation of periodic performance evaluations;
 - f. A record of any disciplinary action/performance issues; and
 - g. Notice of completed responsible vendor and eight-hour related duty training.
3. A staffing plan that will demonstrate accessible business hours
4. Personnel policies and procedures; and
5. All background check reports obtained in accordance with 935 CMR 500.030.

These personnel records will be held electronically and in hard copy. The electronic records will be stored in a secure server with encryption software that protects against unauthorized access to the files. Access to the electronic records will only be allowed to Evergreen Strategies management agents who require access as part of their job duties. Hard Copy (written records) will be stored in a secure, locked cabinet in a locked room accessible to only Evergreen Strategies Management agents who require access. These records will be made available for inspection by the Commission upon request.

Evergreen Strategies Agents

All Evergreen Strategies board members, directors, employees, executives, managers and volunteers will register with the Commission as an Evergreen Strategies Marijuana Establishment Agent ("Evergreen Strategies Agent"). For clarity an employee means, any consultant or contractor who provides on-site services to a Marijuana Retail Establishment related to the packaging, storage, testing, or dispensing of marijuana.

All Evergreen Strategies Agents shall:

1. Be 21 years of age or older;
2. Not been convicted of an offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority; and
3. Be determined suitable for registration consistent with the provisions of 935 CMR 500.800 and 500.802.

Evergreen Strategies will submit to the Commission an application for every Evergreen Strategies Agent, this application will include;

1. The full name, date of birth, and address of the individual;
2. All aliases used previously or currently in use by the individual, including maiden name, if any;
3. A copy of the applicant's driver's license, government-issued identification card, liquor purchase identification card issued pursuant to M.G.L. c. 138, § 34B, or other verifiable identity document acceptable to the Commission;
4. An attestation that the individual will not engage in the diversion of marijuana products;
5. Written acknowledgment by the applicant of any limitations on his or her authorization to cultivate, harvest, prepare, package, possess, transport, and dispense marijuana in the Commonwealth;
6. Background information, including, as applicable:
 - a. a description and the relevant dates of any criminal action under the laws of the Commonwealth, or an Other Jurisdiction, whether for a felony or misdemeanor and which resulted in conviction, or guilty plea, or plea of nolo contendere, or admission of sufficient facts;
 - b. a description and the relevant dates of any civil or administrative action under the laws of the Commonwealth or an Other Jurisdiction, relating to any professional or occupational or fraudulent practices;
 - c. A description and relevant dates of any past or pending denial, suspension, or revocation of a license or registration, or the denial of a renewal of a license or registration, for any

type of business or profession, by any federal, state, or local government, or any foreign jurisdiction;

- d. a description and relevant dates of any past discipline by, or a pending disciplinary action or unresolved complaint by, the Commonwealth, or a like action or complaint by an Other Jurisdiction, with regard to any professional license or registration held by the applicant; and
7. A nonrefundable application fee paid by the Marijuana Establishment with which the marijuana establishment agent will be associated; and
8. Any other information required by the Commission.

Evergreen Strategies' agents will register with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: iCORI Registration and will submit to the Commission a Criminal Offender Record Information (CORI) report and any other background check information required by the Commission for each individual for whom Evergreen Strategies seeks a marijuana establishment agent registration which was obtained within 30 days prior to submission.

Evergreen Strategies will notify the Commission no more than one business day after an Evergreen Strategies agent ceases to be associated with the establishment. The registration shall be immediately void when the agent is no longer associated with the establishment.

The Agent registration card is valid for one year from the date of issue, Evergreen Strategies will renew each Evergreen Strategies Agent Registration Card on an annual basis upon a determination by the Commission that the applicant for renewal continues to be suitable for registration.

After obtaining a registration card for an Evergreen Strategies Agent registration card, Evergreen Strategies will notify the Commission, in a form and manner determined by the Commission, as soon as possible, but in any event, within five business days of any changes to the information that the establishment was previously required to submit to the Commission or after discovery that a registration card has been lost or stolen.

All agents will carry the registration card at all times while in possession of marijuana products, including at all times while at the establishment or while transporting marijuana products.

Background Checks

Evergreen Strategies will comply with all Background Check requirements in the regulations and any other sub-regulatory guidance issued by the Commission.

1. **Application Process-** During the application process Evergreen Strategies will complete the Background Check Packet as outlined in 935 CMR 500.101(1)(b) which includes;
 - a. The list of individuals and entities in 935 CMR 500.101(1)(a)1. (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);
 - b. Information for each individual identified in 935 CMR 500.101(1)(a)1., which shall include:
 - i. The individual's full legal name and any aliases;
 - ii. The individual's address;

- iii. The individual's date of birth;
 - iv. A photocopy of the individual's driver's license or other government-issued identification card;
 - v. A CORI Acknowledgment Form, pursuant to 803 CMR 2.09: Requirements for Requestors to Request CORI, provided by the Commission, signed by the individual and notarized;
 - vi. Authorization to obtain a full set of fingerprints, in accordance with M.G.L. c. 94G, § 21, submitted in a form and manner as determined by the Commission;
- c. Relevant Background Check Information. Applicants for licensure will also be required to provide information detailing involvement in any criminal or civil or administrative matters:
- i. A description and the relevant dates of any criminal action under the laws of the Commonwealth, or another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority, whether for a felony or misdemeanor including, but not limited to, action against any health care facility or facility for providing marijuana for medical or recreational purposes, in which those individuals either owned shares of stock or served as board member, executive, officer, director or member, and which resulted in conviction, or guilty plea, or plea of nolo contendere, or admission of sufficient facts;
 - ii. A description and the relevant dates of any civil action under the laws of the Commonwealth, another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority, including, but not limited to a complaint relating to any professional or occupational or fraudulent practices;
 - iii. A description and relevant dates of any past or pending legal or enforcement actions in any other state against any board member, executive, officer, director or member, or against any entity owned or controlled in whole or in part by them, related to the cultivation, processing, distribution, or sale of marijuana for medical or recreational purposes;
 - iv. A description and the relevant dates of any administrative action, including any complaint, order or disciplinary action, by the Commonwealth, or like action by another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority, including, but not limited to any complaint or issuance of an order relating to the denial, suspension, or revocation of a license, registration, or certification;
 - v. A description and relevant dates of any administrative action, including any complaint, order or disciplinary action, by the Commonwealth, or a like action by another state, the United States or foreign jurisdiction, or a military, territorial, Native American tribal authority or foreign jurisdiction, with regard to any professional license, registration, or certification, held by any board member, executive, officer, director, or member that is part of the applicant's application, if any;

- vi. A description and relevant dates of actions against a license to prescribe or distribute controlled substances or legend drugs held by any board member, executive, officer, director or member that is part of the applicant's application, if any; and
- vii. Any other information required by the Commission.

Evergreen Strategies will not present any individual in our application whose background check will result in a Mandatory Disqualification or Presumptive Negative Suitability Determination as outlined in Table A of 935 CMR 500.801.

2. **Background Checks not included in the Application Process-** For all Marijuana Establishment Agent Registrations not included in the application process Evergreen Strategies will submit Marijuana Establishment Agent applications for all required individuals. Evergreen Strategies will perform its own due diligence and perform background checks, including a CORI report, in the hiring of employees and contractors and will not knowingly submit an employee or contractors' application if the background check would result in a Mandatory Disqualification or Presumptive Negative Suitability Determination as outlined in Table B: Retail and Transporter Marijuana Establishment Agents, under 935 CMR 500.802.

Equal Opportunity Employment Policy

It is the policy of Evergreen Strategies to provide equal employment opportunities to all employees and employment applicants without regard to unlawful considerations of race, religion, creed, color, national origin, sex, pregnancy, sexual orientation, gender identity, age, ancestry, physical or mental disability, genetic information, marital status or any other classification protected by applicable local, state or federal laws. This policy prohibits unlawful discrimination based on the perception that anyone has any of those characteristics or is associated with a person who has or is perceived as having any of those characteristics. This policy applies to all aspects of employment, including, but not limited to, hiring, job assignment, working conditions, compensation, promotion, benefits, scheduling, training, discipline and termination.

Evergreen Strategies expects all employees to support our equal employment opportunity policy, and to take all steps necessary to maintain a workplace free from unlawful discrimination and harassment and to accommodate others in line with this policy to the fullest extent required by law. For example, Evergreen Strategies will make reasonable accommodations for employees' observance of religious holidays and practices unless the accommodation would cause an undue hardship on Evergreen Strategies operations. If an employee desires a religious accommodation, they are required to make the request in writing to their manager as far in advance as possible. Employees requesting accommodations are expected to attempt to find co-workers who can assist in the accommodation (e.g. trade shifts) and cooperate with Evergreen Strategies in seeking and evaluating alternatives.

Moreover, in compliance with the Americans with Disabilities Act (ADA), Evergreen Strategies provides reasonable accommodations to qualified individuals with disabilities to the fullest extent required by law. Evergreen Strategies may require medical certification of both the disability and the need for accommodation. Keep in mind that Evergreen Strategies can only seek to accommodate the known physical or mental limitations of an otherwise qualified individual. Therefore, it is the employees' responsibility to come forward if they are in need of an accommodation. Evergreen Strategies will engage in an interactive process with the employee to identify possible accommodations, if any will help the applicant or employee perform the job.

Anti-Harassment and Sexual Harassment Policy

Evergreen Strategies will promote a workplace that is free from discrimination and harassment, whether based on race, color, gender, age, religion, creed, national origin, ancestry, sexual orientation, marital status or disability. Inappropriate interference with the ability of Evergreen Strategies employees to perform their expected job duties will not be tolerated.

It is illegal and against Evergreen Strategies policy for any employee, male or female, to harass another employee. Examples of such harassment include making sexual advances or favors or other verbal or physical conduct of a sexual nature a condition of any employee's employment; using an employee's submission to or rejection of such conduct as the basis for, or as a factor in, any employment decision affecting the individual; or otherwise creating an intimidating, hostile, or offensive working environment by such conduct.

The creation of an intimidating, hostile, or offensive working environment may include but is not limited to such actions as persistent comments on an employee's sexual preferences, the display of obscene or sexually oriented photographs or drawings, or the telling of sexual jokes. Conduct or actions that arise out of a personal or social relationship and that are not intended to have a discriminatory employment effect may not be viewed as harassment. Evergreen Strategies will determine whether such conduct constitutes sexual harassment, based on a review of the facts and circumstances of each situation.

Evergreen Strategies will not condone any sexual harassment of its employees. All employees, including supervisors and managers, will be subject to severe discipline, up to and including discharge, for any act of sexual harassment they commit.

Evergreen Strategies will not condone sexual harassment of its employees by non-employees, and instances of such harassment should be reported as indicated below for harassment by employees.

If you feel victimized by sexual harassment you should report the harassment to your manager immediately. If your immediate manager is the source of the alleged harassment, you should report the problem to the Human Resources Department.

Managers who receive a sexual harassment complaint should carefully investigate the matter, questioning all employees who may have knowledge of either the incident in question or similar problems. The complaint, the investigative steps and findings, and disciplinary actions (if any) should be documented as thoroughly as possible.

Any employee who makes a complaint, or who cooperates in any way in the investigation of same, will not be subjected to any retaliation or discipline of any kind.

In addition to the above, if you believe you have been subjected to sexual harassment, you may file a formal complaint with either or both of the government agencies set forth below. Using our complaint process does not prohibit you from filing a complaint with these agencies. Each of the agencies has a short time period for filing a claim (EEOC - 300 days; MCAD - 300 days).

The United States Equal Employment Opportunity Commission ("EEOC") One Congress Street, 10th Floor Boston, MA 02114, (617) 565-3200.

The Massachusetts Commission Against Discrimination ("MCAD") One Ashburton Place, Rm. 601, Boston, MA 02108, (617) 994-6000.

Americans with Disability Act

Evergreen Strategies strongly supports the policies of the Americans with Disabilities Act and is completely committed to treating all applicants and employees with disabilities in accordance with the requirements of that act. Evergreen Strategies judge's individuals by their abilities, not their disabilities, and seeks to give full and equal employment opportunities to all persons capable of performing successfully in the company's positions. Evergreen Strategies will provide reasonable accommodations to any persons with disabilities who require them, who advise Evergreen Strategies of their particular needs. Information concerning individuals' disabilities and their need for accommodation will of course be handled with the utmost discretion.

Drug/Alcohol Free Workplace

Evergreen Strategies is committed to providing its employees with a safe and productive work environment. In keeping with this commitment, it maintains a strict policy against the use of alcohol and the unlawful use of drugs in the workplace. Consequently, no employee may consume or possess alcohol, or use, possess, sell, purchase or transfer illegal drugs at any time while on Evergreen Strategies premises or while using Evergreen Strategies vehicles or equipment, or at any location during work time.

No employee may report to work with illegal drugs (or their metabolites) or alcohol in his or her bodily system. The only exception to this rule is that employees may engage in moderate consumption of alcohol that may be served and/or consumed as part of an authorized Company social or business event. "Illegal drug" means any drug that is not legally obtainable or that is legally obtainable but has not been legally obtained. It includes prescription drugs not being used for prescribed purposes or by the person to whom it is prescribed or in prescribed amounts. It also includes any substance a person holds out to another as an illegal drug.

Any violation of this policy will result in disciplinary action, up to and including termination.

Any employee who feels he or she has developed an addiction to, dependence upon, or problem with alcohol or drugs, legal or illegal, is strongly encouraged to seek assistance before a violation of this policy occurs. Any employee who requests time off to participate in a rehabilitation program will be reasonably accommodated. However, employees may not avoid disciplinary action, up to and including termination, by entering a rehabilitation program after a violation of this policy is suspected or discovered.

Smoke Free Workplace

Smoking is prohibited throughout the workplace. This policy applies equally to all employees, clients, partners, and visitors.

Employee Assistance Policy

To help employees in circumstances where counseling services would be helpful, Evergreen Strategies will make an Employee Assistance Program (EAP) counseling service available to employees, when needed, at no personal cost.

Employee Diversion of Marijuana

If an Evergreen Strategies Agent is found to have diverted marijuana, that agent will immediately be dismissed and have their Marijuana Establishment Registration Card confiscated. The Director of HR will immediately be notified. The Director of HR will make a detailed report of the event and report it to local law enforcement and the Commission within 24 hours.

Employee Handbook

Evergreen Strategies will provide a comprehensive employee handbook to all employees that will outline all the information pertinent to their employment with Evergreen Strategies. These subjects will include, but not be limited to;

1. Evergreen Strategies Mission and Vision
2. Organizational Structure
3. General Employment Policies
4. Employee Categories
5. Conflicts of Interest
6. Access to Personnel Files
7. Performance Evaluations
8. Hours of Work
9. Compensation
10. Benefits
11. Code of Conduct
12. Discipline
13. Training

EVERGREEN STRATEGIES, LLC.

DIVERSITY AND INCLUSION PLAN

Evergreen Strategies is committed to a culture where all people are represented, respected and appreciated. Diversity is a core value of the company because it broadens our skill base and helps us become more competitive and innovative. Moreover, Evergreen recognizes our responsibility to promote a society where underrepresented groups get their fair share of opportunities.

At Evergreen Strategies, we are committed to providing equitable employment opportunity to all applicants and employees without regard to race, gender, national origin, age, sexual orientation, marital status, pregnancy, disability, genetic information, religion or any other non-merit factor.

Evergreen Strategies acknowledges and is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment and that any actions taken, or programs instituted, will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

1. PROGRAM POPULATIONS

The Program in this plan will be tailored to the following populations:

- A. Minorities;
 - B. Women;
 - C. Veterans;
 - D. People with disabilities; and
 - E. People who are LBGTQ+.
-

2. DIVERSITY GOALS

The company plans to hire and retain a diverse workforce that promotes and celebrates people of all types including minorities, women, veterans, people with disabilities and people who are LBGTQ+. Recognizing the modest size of a dispensary staff (15-20), we expect to achieve the following diversity employment targets.

- A. For all of our Retail Establishment our goal is that 55% of our employees will be female.

- B. For our Worcester Retail Establishment, 60% of our employees will fall into Sections A, C, D and E of the Program Populations outlined in Section 1. (~45% of the Worcester Population is a minority.)
 - C. For our North Adams Retail Establishment 40% of our employees will fall into Sections A, C, D and E of the Program Populations outlined in Section 1. (~10% of the North Adams Population is a minority.)
-

3. HIRING PROGRAM

Evergreen Strategies will give preference in the hiring of employees to those who meet the criteria outlined in Section 1. In an effort to source employees who meet the Program Populations, Evergreen Strategies will:

- A. Develop recruitment materials that emphasize our commitment to hiring a diverse workforce and use images that reflect people of different ethnicities and backgrounds.
- B. Job postings will be written in gender neutral language and explicitly state the company's hiring preference and display a meaningful inclusivity statement.
- C. Postings will be listed with the MassHire Berkshire Career Center and the Worcester Workforce Central Career Center and the company will participate in job fairs associated with each local Career Center.
 - i. Job fairs will be held approximately 60 days prior to our expected opening date for each of our retail establishments.
 - ii. Second and subsequent job fairs will be held as employment needs necessitate.
- D. We will actively support industry trade groups that promote diversity and inclusion. We will participate in hiring and recruitment initiatives that these groups sponsor. These groups include:
 - i. The Massachusetts Cannabis Business Association (Mass CBA)
 - ii. Massachusetts Recreational Consumer Council (MRCC)
 - iii. Elevate Northeast
- E. All managers will participate in annual training to uncover and help mitigate unconscious bias. Interview teams will reflect diversity among our employees whenever possible.
 - i. All managers will receive training in diversity hiring practices prior to the hiring of employees. This training will be done through Diversity Resources <https://www.diversityresources.com/>

- F. Our hiring processes will minimize bias by allowing hiring managers to focus only on factors that have a direct impact on performance. These processes include:
- i. Advanced training to our Hiring Managers and Human Resources teams;
 - i. This training will be done through Diversity Resources <https://www.diversityresources.com/> annually.
 - ii. Using gender neutral language in all posting and recruitment materials;
 - iii. Blind resumes and applications. Prior to the hiring team evaluating resumes or application materials, the names, ethnicities, addresses and other personal information that could lead to unconscious bias will be removed.
 - iv. Standardized interviews and scoring.
-

4. MEASUREMENTS

Annually, 60 days prior to our License renewal, Evergreen Strategies will conduct a comprehensive written evaluation of the program outlined above. The purpose of the evaluation will be to measure the goals that are outlined in this Plan. This written evaluation will be available to the Commission for review during the License renewal process.

Each adult use marijuana dispensary is expected to employ 15 to 20 individuals when fully operational. Program evaluation metrics from the company's talent management database will be evaluated quarterly with the following metrics reported to management:

- A. Number and types of hires for each retail establishment;
- B. The number and percentage of hires that meet the Program Populations outlined in Section 1;
- C. The number and percentage of employees that come from disproportionate impacted areas;
- D. The number and percentage of applicants who meet the Program Populations, and if not hired, a detailed explanation why they were not hired; and
- E. Training records for all Diversity training completed by Evergreen Strategies employees.

Evergreen Strategies. Maintenance of Financial Records Policy and Procedure Summary

Intent

To provide clear and concise instructions for Evergreen Strategies employees regarding the Maintenance of Financial Records that are compliant with the regulations.

Evergreen Strategies is committed to being compliant with all regulations outlined in 935 CMR 500.000 et. seq. ("the Regulations") and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission ("CNB" or "the Commission") or any other regulatory agency.

Purpose

The purpose of this policy is to outline the responsibilities of the Company, the Company's management team and agents to ensure specific, methodical, and consistent compliance of the regulations and to ensure that our financial records are maintained in a compliant manner with all regulations and laws.

Policy

Evergreen Strategies financial records will be kept and maintained according to generally accepted accounting principles. The Finance Director is responsible for all accounting responsibilities and will engage the services of external professional accounting firm to ensure proper financial compliance.

All Evergreen Strategies financial/business records will be available for inspection to the Cannabis Control Commission upon request.

Evergreen Strategies will maintain all business records in Manual and electronic form. These records include, but are not limited to;

1. Assets and liabilities;
2. Banking transactions;
3. Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
4. Sales records including the quantity, form, and cost of marijuana products; and
5. Salary and wages paid to each employee, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the nonprofit corporation, if any.

In relation to the maintenance of financial records Evergreen Strategies will incorporate the following into our business operations;

1. Evergreen Strategies will engage the services of a professional payroll and human resources company to assist in human resources management and payroll services for our employees
2. Evergreen Strategies will engage, to the extent possible, a banking relationship in Massachusetts to provide banking services for our company.

3. Evergreen Strategies will utilize financial/accounting software programs and an e-bill payment provider for all financial record keeping.
4. All inter-LME transactions will be done through traditional banking transactions including checks, wire transfers or credit cards.
5. On an annual basis an independent certified public accountant who is experienced in the legal marijuana industry, will conduct a financial audit.
6. Evergreen Strategies will engage the services of an industry experienced tax professional for the filing of all required state and federal tax documents.
7. At the end of each business day a reconciliation audit will be done on each POS station by the Retail Manager or designee.
8. A comprehensive financial audit will be done at the end of every month by the Finance Director and report their findings to the CEO and outside accounting firm.

Access to the Commission

Evergreen Strategies electronic and hard copy (written) records will be available to the Commission upon request pursuant to 935 CMR 500.105(9). The records will be maintained in accordance with generally accepted accounting principles. All written records required in any section of 935 CMR 500.000 are subject to inspection.

Access to the Massachusetts Department of Revenue ("DOR")

Evergreen Strategies books, records, papers and other data will be made available upon request by the DOR. Accounting records and information in electronic format will be provided in a searchable electronic format if requested by the Commission or the DOR. Any additional reports and schedules relating to the preparation of tax returns will be maintained and made available upon request. Inventory system data as well as any additional purchase reports, schedules or documentation that reconcile to other books and records, such as purchase journals or a general ledger, will also be maintained and made available upon request.

These records will be kept so long as their contents are material in the administration of Massachusetts and IRS tax laws. At a minimum, unless the DOR Commissioner consents in writing to an earlier destruction, the records will be preserved until the statute of limitations for making additional assessments for the period for which the return was due has expired. The DOR may require a longer retention period, such as when the records are the subject of an audit, court case, or other proceeding.

Additionally, Evergreen Strategies will comply with all records retention requirements outlined in the DOR Regulations including but limited to 830 CMR 62C.25.1: Record Retention.

Point of Sale (POS) Systems

Evergreen Strategies will utilize a POS system that complies with the requirements in G.L. c. 62C, § 25; 830 CMR 62C.25.1 (the Records Retention Regulation); and the Massachusetts Department of Revenue ("DOR") Directive 16-1 *"Recordkeeping Requirements for Sales and Use Tax Vendors Utilizing Point of Sale (POS) Systems"*

1. Our POS system will record all transactions in a manner that will allow the DOR to verify what was sold and whether the appropriate amount of tax was collected. Along with the data in the POS system, Evergreen Strategies will maintain the following records:

- a. A journal or its equivalent, which records daily all non-cash transactions affecting accounts payable;
 - b. A cash journal or its equivalent, which records daily all cash receipts and cash disbursements, including any check transactions;
 - c. A sales slip, invoice, cash register tape, or other document evidencing the original transaction, which substantiates each entry in the journal or cash journal;
 - d. Memorandum accounts, records or lists concerning inventories, fixed assets or prepaid items, except in cases where the accounting system clearly records such information; and
 - e. A ledger to which totals from the journal, cash journal and other records have been posted. The ledger must clearly classify the individual accounts receivable and payable and the capital account.
2. Each POS transaction record will provide enough detail to independently determine the taxability of each sale and the amount of tax due and collected. Information on each sales transaction will include, but is not limited to the:
 - a. individual item(s) sold,
 - b. selling price,
 - c. tax due,
 - d. invoice number,
 - e. date of sale,
 - f. method of payment, and
 - g. POS terminal number and POS transaction number.
3. Evergreen Strategies will maintain auditable internal controls to ensure the accuracy and completeness of the transactions recorded in the POS system. The audit trail details include, but are not limited to:
 - a. Internal sequential transaction numbers;
 - b. Records of all POS terminal activity; and
 - c. Procedures to account for voids, cancellations, or other discrepancies in sequential numbering.
 - d. The POS audit trail or logging functionality must be activated and operational at all times, and it must record:
 - e. Any and all activity related to other operating modes available in the system, such as a training mode; and
 - f. Any and all changes in the setup of the system.
4. Evergreen Strategies will comply with the provisions of 935 CMR 500.140(6): Recording Sales.
 - a. Evergreen Strategies will only utilize a point-of-sale (POS) system approved by the Commission, in consultation with the DOR.
 - b. Evergreen Strategies may utilize a sales recording module approved by the DOR.

- c. Evergreen Strategies will not utilize software or other methods to manipulate or alter sales data.
- d. Evergreen Strategies will conduct a monthly analysis of our equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. Evergreen Strategies will maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If Evergreen Strategies determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data:
 - i. We will immediately disclose the information to the Commission;
 - ii. We will cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and
 - iii. We will take such other action directed by the Commission to comply with 935 CMR 500.105.
- e. Evergreen Strategies will comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements.
- f. Evergreen Strategies will adopt separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales.
- g. Evergreen Strategies will allow the Commission and the DOR may audit and examine our point-of-sale system in order to ensure compliance with Massachusetts tax laws and 935

Evergreen Strategies Qualifications and Training Policy and Procedure Summary

Intent

To provide clear and concise instructions for Evergreen Strategies employees regarding the qualifications for employment and agent training that are compliant with the regulations.

Evergreen Strategies is committed to being compliant with all regulations outlined in 935 CMR 500.000 et. seq. ("the Regulations") and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission ("CNB" or "the Commission") or any other regulatory

Purpose

The purpose of this policy is to outline the responsibilities of the Company, the Company's management team and Agents to ensure specific, methodical, and consistent compliance of the Regulations and to ensure that we only hire qualified Marijuana Establishment Agents and that our training process and curriculum are in compliance with all regulations and laws.

Qualifications for an Evergreen Strategies Marijuana Establishment Agent

The minimum requirements to become an Evergreen Strategies' Marijuana Establishment Agent ("Agent") are outlined below. All Evergreen Strategies board members, directors, employees, executives, managers or volunteers will register with the Commission as an Agent. For clarity an employee means, any consultant or contractor who provides on-site services to a Marijuana Establishment related to the cultivation, harvesting, preparation, packaging, storage, testing, or dispensing of marijuana.

All Evergreen Strategies Agents must;

1. Be 21 years of age or older;
2. Not been convicted of an offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority; and
3. Be determined suitable for registration consistent with the provisions of 935 CMR 500.800 and 500.802.

Evergreen Strategies will develop a job description for all positions with the company. While all Agents must meet the qualifications listed above, several of our positions will require additional qualifications based on the specific duties of the position.

Required Training for Evergreen Strategies Agents

Pursuant to 935 CMR 500.105(2)(a) Evergreen Strategies will ensure all Evergreen Strategies Agents complete training prior to performing job functions. Training will be tailored to the role and responsibilities of the job function.

1. Evergreen Strategies will train all marijuana establishment agents in compliance with 935 CMR 500.105(2)(a) and (b). Agents responsible for tracking and entering product into the Seed-to-sale SOR (Metrc) must receive training in a form and manner determined by the Commission.

2. Our initial training begins during employee orientation where all new employees will be issued their employee handbook. Classroom or online training on this day will include, but not be limited to;
 - a. Code of Conduct;
 - b. Verifying Identifications;
 - c. Marijuana Regulations;
 - d. Security and Safety;
 - e. Emergency Procedures/Disaster Plan;
 - f. Diversion of Marijuana;
 - g. Terminatable Offences;
 - h. Confidential Information;
 - i. Employee Policies (all employee policies from the handbook will be covered) including but not limited to;
 - i. Alcohol, smoke and drug-free workplace;
 - ii. Equal Employment Policy;
 - iii. Anti-Harassment and Sexual Harassment Policy;
 - iv. Americans with Disability Act;
 - v. Employee Assistance Policy; and
 - vi. Diversity Plan
3. After the initial training is complete agents will be trained on job specific areas depending on their duties. This training can be done in a classroom setting, online or computerized, on the job training ("OJT") or through external training platforms.
4. All Evergreen Strategies Agents will receive a minimum of 16 hours of training annually.
5. Evergreen Strategies will record, maintain and store 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. These records will be stored in the Agents Personnel File. Training records will be retained by Evergreen Strategies for at least one year after agents' termination.
6. Within 90 days of hire, Evergreen Strategies will require all of its Agents to attend and complete a Responsible Vendor Training Program to become designated as a "responsible vendor"
 - a. After the responsible vendor designation is applied each Evergreen Strategies owner, manager, and employee 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."
 - b. Evergreen Strategies will maintain records of responsible vendor training program compliance for four years and make them available to inspection by the Commission and any other applicable licensing authority upon request during normal business hours.

7. All retail employees will be trained on:
- a. Safety and Security;
 - b. Disaster plan;
 - c. Privacy ;
 - d. Cash handling;
 - e. Diversion prevention and prevention of sales to minors, including best practices;
 - f. Compliance with all tracking requirements;
 - g. Acceptable forms of identification. Training shall include:
 - h. How to check identification;
 - i. Spotting false identification; and
 - j. Common mistakes made in verification

Additional Training

Evergreen Strategies will provide training and training opportunities to its employees. In addition to required training, Evergreen Strategies will encourage advanced training to our employees in the areas of Safety and Security, Marijuana Science or other areas then enhance the Company's, our Agents and our customers safety and shopping experience.