



Massachusetts Cannabis Control Commission

Marijuana Cultivator

General Information:

License Number: MC283508
Original Issued Date: 11/20/2021
Issued Date: 10/13/2022
Expiration Date: 11/20/2023

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Jolly Green Inc

Phone Number: 978-502-3740 Email Address: higginsmechanical@comcast.net

Business Address 1: 246 Suffolk Lane

Business Address 2:

Business City: Gardner

Business State: MA

Business Zip Code: 01440

Mailing Address 1: 442 Howard st

Mailing Address 2:

Mailing City: Lunenburg

Mailing State: MA

Mailing Zip Code: 01462

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: Director

Other Role:

First Name: Kyle

Last Name: Higgins

Suffix:

Gender: Male

User Defined Gender:

What is this person's race or ethnicity?: Decline to Answer

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: Kyle

Last Name: Higgins

Suffix:

Types of Capital: Other (Specify)

Other Type of Capital: Funds are my personal savings account at TD Bank and will be loaned to Jolly Green Inc

Total Value of the Capital Provided: \$250000

Percentage of Initial Capital: 100

Capital Attestation: Yes

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 246 Suffolk Lane

Establishment Address 2:

Establishment City: Gardner

Establishment Zip Code: 01440

Approximate square footage of the Establishment: 13500

How many abutters does this property have?: 2

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

Cultivation Tier: Tier 02: 5,001 to 10,000 sq. ft.

Cultivation Environment: Indoor

FEE QUESTIONS

Cultivation Tier: Tier 02: 5,001 to 10,000 sq. ft. Cultivation Environment: Indoor

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	Host community-agreementdocs.pdf	pdf	614a01927cede707aacb14bd	09/21/2021
Community Outreach Meeting Documentation	Host-comm-doc.pdf	pdf	614a025c7736bf07c42f5e71	09/21/2021
Plan to Remain Compliant with Local Zoning	Plan Zoning.pdf	pdf	614a063c10e8450793e1a347	09/21/2021

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	Positive Impact revised 10-4-21.pdf	pdf	615b8e662831f56830cd69ac	10/04/2021

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Other Role:
First Name: Kyle Last Name: Higgins 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	Upload Date
Articles of Organization	JGarticleOfOrgan.pdf	pdf	61096a9feccced39822b8bd6	08/03/2021
Bylaws	Revised bylaw.pdf	pdf	614a11b98b811c07bff6f7ad	09/21/2021
Secretary of Commonwealth - Certificate of Good Standing	UpdatedCertifOfGood SEC state.pdf	pdf	614a12c5c4d84107a3221479	09/21/2021
Department of Revenue - Certificate of Good standing	CertOf GoodTax.pdf	pdf	614a1375fa001407bd31509a	09/21/2021
Department of Revenue - Certificate of Good standing	AllcertificateOfGoodStandfing.pdf	pdf	614a3cfcc12c6607a11af4e0	09/21/2021

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	SecretaryOfStateLetterOfGoodStanding.pdf	pdf	6317758a44fa35000ae36533	09/06/2022
Department of Revenue - Certificate of Good standing	MaTaxLetterOfGoodStanding.pdf	pdf	6317759ad239e20007ea9479	09/06/2022
Department of Unemployment Assistance - Certificate of Good standing	Dept-unemployment-letterOfGoodStanding.pdf	pdf	631775a5d239e20007ea94a8	09/06/2022

Massachusetts Business Identification Number: 001325206

Doing-Business-As Name:

DBA Registration City:**BUSINESS PLAN****Business Plan Documentation:**

Document Category	Document Name	Type	ID	Upload Date
Business Plan	Cultivation Business Plan 4-01-2021.pdf	pdf	61096d3c324d4e3994c3b97b	08/03/2021
Plan for Liability Insurance	JG Insurance Plan.pdf	pdf	61096f55c618dd39aab4f879	08/03/2021
Plan for Liability Insurance	Revised plan to obtain liability insurance.pdf	pdf	614a2bd219da0307d3559e32	09/21/2021
Proposed Timeline	ProposedTimeLine09:07:22.pdf	pdf	631b864c44fa35000ae91d7f	09/09/2022

OPERATING POLICIES AND PROCEDURES**Policies and Procedures Documentation:**

Document Category	Document Name	Type	ID	Upload Date
Prevention of diversion	security_plan_-_Diversion .pdf	pdf	61098d0f85b72937d30126df	08/03/2021
Storage of marijuana	Storage of marijuana.pdf	pdf	61098ebfbde213399f80e185	08/03/2021
Dispensing procedures	Inventory tracking:dispensing.pdf	pdf	6109953a7671e237b2f0295a	08/03/2021
Personnel policies including background checks	staffing_and_training_plan_updated 3-26-19.pdf	pdf	610995e28a09343989a1909f	08/03/2021
Record Keeping procedures	record_keeping_plan_3-23-20.pdf	pdf	61099640b6c7ee37de462571	08/03/2021
Maintaining of financial records	record_keeping_plan_3-23-20.pdf	pdf	6109966167158339c0ec25f4	08/03/2021
Security plan	security_plan_-_Diversion .pdf	pdf	614a2ea0179a26079c9e5e02	09/21/2021
Transportation of marijuana	distribution_transportation_plan_20190211.pdf	pdf	614a2f6d8b811c07bff6f95f	09/21/2021
Quality control and testing	Quality Assurance Plan.pdf	pdf	614a315b7cde707aacb176f	09/21/2021
Inventory procedures	Inventory control plan.pdf	pdf	614a3261f076f507dc7e08cb	09/21/2021
Restricting Access to age 21 and older	Addendum 21 or older.pdf	pdf	614a34777cde707aacb17b0	09/21/2021
Qualifications and training	staffing_and_training_plan_3-23-20.pdf	pdf	614a35a1e4062c07dab7a9d5	09/21/2021
Diversity plan	Diversity Plan revised 9:20:21.pdf	pdf	614a35f97cde707aacb17c5	09/21/2021
Policies and Procedures for cultivating.	cultivation-updated##.pdf	pdf	614a3744ed983707e971d495	09/21/2021
Energy Compliance Plan	Energy Compliance Plan.pdf	pdf	614a3a993e5df507d5e58363	09/21/2021

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 Agree

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification:

COMPLIANCE WITH POSITIVE IMPACT PLAN

Progress or Success Goal 1

Description of Progress or Success:

Goal #1 was to use 50% of the vendor's and subcontractor's from positive impact communities. We have successfully exceeded our goal and will continue to do so.

In addition we are reporting that one of our employees lives in a disproportionate impact community of Fitchburg.

COMPLIANCE WITH DIVERSITY PLAN

Diversity Progress or Success 1

Description of Progress or Success:

Goal #1 was to create jobs within diverse communities. We have been successful in reaching our goals this year and will strive to continue to do so.

Goal #2 was to create equity in our business operations by using outside vendors owned by women, veteran's, people with disabilities and LGBTQ+. We have been successful with goal #2 as well.

HOURS OF OPERATION

Monday From: Open 24 Hours	Monday To: Open 24 Hours
Tuesday From: Open 24 Hours	Tuesday To: Open 24 Hours
Wednesday From: Open 24 Hours	Wednesday To: Open 24 Hours
Thursday From: Open 24 Hours	Thursday To: Open 24 Hours
Friday From: Open 24 Hours	Friday To: Open 24 Hours
Saturday From: Open 24 Hours	Saturday To: Open 24 Hours
Sunday From: Open 24 Hours	Sunday To: Open 24 Hours

Host Community Agreement Certification Form

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

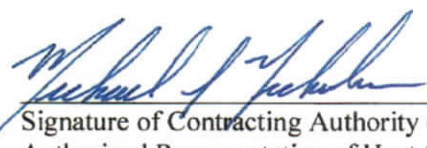
Applicant

I, Kyle Higgins, (insert name) certify as an authorized representative of Jelly Green Inc. (insert name of applicant) that the applicant has executed a host community agreement with City of Gardner (insert name of host community) pursuant to G.L.c. 94G § 3(d) on May 31, 2021 (insert date).


Signature of Authorized Representative of Applicant

Host Community

I, Michael J Nicholson (Mayor), (insert name) certify that I am the contracting authority or have been duly authorized by the contracting authority for City of Gardner (insert name of host community) to certify that the applicant and City of Gardner (insert name of host community) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on May 31, 2021 (insert date).


Signature of Contracting Authority or
Authorized Representative of Host Community

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): 8-19-21
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:

8-04-21

b. Name of publication:

Gardner News

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:

8-6-21

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:

8-3-21

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:

Jolly Green Inc

Name of applicant's authorized representative:

Kyle Higgins

Signature of applicant's authorized representative:





JOLLY GREEN, INC.
HOST COMMUNITY AGREEMENT FOR THE SITING OF A MARIJUANA
ESTABLISHMENT FOR CULTIVATION
IN THE CITY OF GARDNER, MASSACHUSETTS

The Host Community Agreement (the "**Agreement**") is entered into this 31st day of May, 2021 (the "**Effective Date**") by and between the City of Gardner, acting by through its Mayor, with a principal address of 95 Pleasant Street, Gardner, MA 01440 (hereinafter the "**City**") and Jolly Green, Inc. ("the **Company**") a Massachusetts for-profit corporation, with an address of 60 Franklin Street, Winchendon, MA 01475 (City and Company, collectively the "**Parties**").

RECITALS

WHEREAS, Company wishes to locate a cultivation facility ("the **Facility**") for marijuana in the City, at 246 Suffolk Lane in Summit Industrial Park, in accordance with applicable regulations issued by the Commonwealth of Massachusetts Department of Public Health ("**DPH**"), The Cannabis Control Commission ("**CCC**"), or such other state licensing or monitoring authority, as the case may be;

WHEREAS, Company desires to provide community impact fee payments to the City pursuant to M.G.L. c. 94G, § 3(d) and any successor statutes and regulations, in order to address any reasonable costs imposed upon the City by Company's operations in the City.

WHEREAS, the City supports Company's intention to operate a Facility for the cultivation of marijuana at the Facility in the City.

WHEREAS, the Parties intend by the Agreement to satisfy the provisions of M.G.L. c. 94G, § 3(d), as established by the Act, applicable to the operation of a Facility in the City.

Now THEREFORE, in consideration of the provisions of this Agreement, the Company offers and the City accepts this Host Agreement in accordance with M.G.L. c.94G, § 3(d), on the following terms:

AGREEMENT

1. COMMUNITY IMPACT: in order to mitigate the possible financial impact upon the City and use of the city's resources, Pursuant to M.G.L. c.94G, §3(d), the Company agrees to make the payments to the City in the amounts and under the terms provided herein.
2. HOST COMMUNITY PAYMENTS:
Payments. In the event that Company obtains a Final Certificate of Registration, or such other license and/or approval as may be required under applicable state and municipal law (collectively "**State Law**"), for the operation of a Facility from

Massachusetts DPH or the CCC or such other state licensing or monitoring authority, as the case may be (each a "Licensing Authority," collectively the "Licensing Authorities"), and receives all required approvals from the City to operate a Facility, then Company agrees to make the following payments to the City:

- a. The Company shall make quarterly host community payments of **3 percent (3%) of the gross annual revenue received** from the wholesale sales of marijuana and marijuana products, if applicable, (the "Quarterly Payment") for a period of five (5) years. The initial Quarterly Payment shall be due (3) months after the Cultivation Establishment is operational (the "Initial Payment") pro-rated to the quarter ending date, and each subsequent Quarterly Payment shall be due (3) months from the Initial Payment. Company shall have thirty (30) days from the due date to issue payment to the City. For payment purposes a quarter shall end on the last day of March, June, September, and December of each year.
 - b. When the Company makes its payment, it shall accompany such payment with a printout from its seed-to-sale software program documenting the recreational sales and certification from its Chief Operating Officer as to the accuracy and veracity of such sales figures. The Company shall maintain its books, financial records, and other compilations of data pertaining to the sales in accordance with standard accounting practices and any applicable regulations or guidelines of the CCC. The City shall have the right to examine or audit all records associated with such payments.
3. **PAYMENTS:** The Company shall make the Payments to the City as set forth in Section 1 and 2 of this Agreement. The Parties acknowledge that the City has the sole discretion for determining how to spend the Payments.
 4. **TAXES:** At all times during the Term of the Agreement, property, both real and personal, owned or operated by Company shall be treated as taxable, and all applicable real estate and personal property taxes for the property shall be paid either directly by Company or by its landlord, neither Company nor its landlord shall object or otherwise challenge the taxability of such property. Nothing herein shall limit, affect or be affected by the imposition of any tax on the Company pursuant to G.L. c. 64H and 64N nor shall the Payments be reduced by or offset against any taxes paid thereunder or on account of any taxes levied on real or personal property.
 5. **PURPOSE:** The purpose of this Agreement is to assist the City in addressing any potential public health, safety, and other effects or impacts the Facility may have on the City and on municipal programs, services, personnel, and facilities.

6. COMMUNITY SUPPORT AND OTHER OBLIGATIONS:

- a. Annual Charitable Contribution – The Company, in addition to any funds specified herein, shall contribute on an **annual basis** to a public charity or benefit of its choosing, within the City, **Five Thousand Dollars (\$5,000)**. The Company shall annually submit a list of said charitable contributions to the City.
 - b. Local Vendors – to the extent such practice and its implementation are consistent with federal, state, and municipal laws and regulations, Company will make every effort in a legal and non-discriminatory manner to give priority to local businesses and vendors in the provision of goods and services called for in the construction, maintenance and continued operation of the Facility. Company shall use good faith efforts to ensure that at least fifty percent (50%) of the vendors and/or contractors utilized by the Facility will be based in the City.
 - c. Employment/Salaries – except for senior management, and to the extent such practice and its implementation are consistent with federal, state, and municipal laws and regulations, Company shall use good faith efforts to ensure that at least fifty percent (50%) of the employees of the Facility will be City residents.
 - d. Company shall provide the City with annual reports indicating the percentages of vendors and employees in accordance with paragraphs (a) and (b) above.
 - e. The Company shall, at least annually, provide the City with copies of all reports submitted to the Licensing Authority regarding operations at the Facility.
 - f. The Company will work with the City's Health Department to ensure that all Company products are tested to the satisfaction of the City.
 - g. In the event that the Company enters into a Host Community Agreement with another municipality within 30 miles of the City for the siting of a licensed marijuana establishment facility in that municipality, or compensates another municipality in any way for siting a licensed marijuana retail establishment dispensing facility in that municipality, and the amount of compensation to the other municipality exceeds the Company's payments under paragraph 1(a) of this Agreement, the Company and the City shall amend this Agreement to reflect the difference paid to the other municipality described in this paragraph. For example, if the Company enters into an agreement with another municipality in which it pays more than 3% of gross sales revenue, Paragraph 1(a) of this Agreement shall be amended to reflect that the Company shall pay the City the higher percentage of gross sales revenue.
7. RELOCATION: In the case that the Company desires to relocate the Facility within the City it must first obtain any and all State and local approvals of the new location before any relocation.

8. SECURITY: The Company shall coordinate with the Gardner Police Department in the development and implementation of reasonable security measures, under 105 CMR 725.110 and otherwise, including determining the placement of exterior security cameras. The Company shall maintain a cooperative relationship with the Gardner Police Department, including but not limited to, periodic meetings to review operational concerns and communication to Gardner Police Department of any suspicious activities on the site. In addition, Company shall at all times comply with State Law regarding security of the Facility.
9. CONTROLLING ACCESS: A key-and-lock system shall not be the sole means of controlling access to the Facility. The Company agrees to implement a method such as a keypad, electronic access card, or other similar method for controlling access to areas in which marijuana or marijuana products are kept in compliance with 935 CMR 500.110.
10. SUPPORT FOR REGISTRATION:
 - a. The City shall work cooperatively and in good faith with the Company in an effort to support the Company's application for registration of its Facility in the City by the applicable Licensing Authority.
 - b. The City agrees to submit to the applicable Licensing Authority, certification of compliance with applicable local ordinances relating to the Company's application for licensure and/or operation where such compliance has been properly met, but makes no representation or promise that it will act on any other license or permit request including but not limited to Special Permit or other zoning applications submitted by the Company in any particular way other than in accordance with the municipality's governing laws.
11. OUTREACH: The City agrees to work with the Company, if approved, to assist the Company with community support, public outreach and employee outreach programs.
12. EDUCATIONAL PROGRAMS: The Company agrees to work collaboratively with the Municipality and provide staff to participate in a reasonable number of Municipality-sponsored educational programs on public health and drug abuse prevention geared toward public health and public safety personnel.
13. SUCCESSORS/ASSIGNS: This Agreement is binding upon the Parties, and their respective successors, assigns and legal representatives. The City shall not assign or transfer any interest or obligations in this Agreement without the prior written consent of the Company, which shall not be unreasonably delayed, conditioned, or withheld. The

Company shall not assign or transfer any interest or obligation under this Agreement without the prior written consent of the City, which shall not be unreasonably delayed, conditioned, or withheld.

14. RETENTION OF REGULATORY AUTHORITY: By entering into this Agreement, the City does not waive any enforcement rights or regulatory authority it currently holds over any business in the City.
15. SEVERABILITY: If any term or condition of this Agreement or any application thereof shall to any extent be held invalid, illegal or unenforceable by the court of competent jurisdiction, the validity, legality, and enforceability of the remaining terms and conditions of this Agreement shall not be deemed affected thereby unless one or both Parties would be substantially or materially prejudiced.
16. ENTIRE AGREEMENT: This Agreement constitutes the entire integrated agreement between the Parties with respect to the matters described. This Agreement supersedes all prior agreements, negotiations and representations, either written or oral, and it shall not be modified or amended except by written document executed by the Parties hereto.
17. NOTICES: Except as otherwise provided herein, any notices under this Agreement shall be in writing and addressed as Follows:

To City: Michael J. Nicholson
Mayor
Gardner City Hall
95 Pleasant Street
Gardner, MA 0144

To Company: Jolly Green, Inc.
c/o Kyle Higgins
60 Franklin Street
Winchendon, MA 01475

18. TERM AND TERMINATION: This Agreement shall take effect on the day above written, subject to the contingencies noted herein. This agreement shall continue in effect for five (5) years from the date of this Agreement. In the event Company no longer does business in the City or in any way loses or has its license revoked by the State, this Agreement shall become null and void. Company shall not be required to cease operations at the termination of this Agreement.

The Company shall not operate without a current Host Community Agreement with the City in place. The Company shall initiate negotiations no later than sixty (60) days prior to the expiration of the then current Agreement. Any increase in the Community Impact

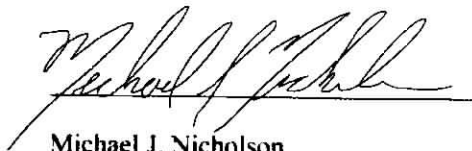
Fee must be reasonably related, and demonstrated by the City, to the costs imposed upon the City by the operation of the Marijuana Establishment.

19. CONFIDENTIALITY: Company may provide to the city, certain financial information, investment materials, product, plans, documents, details of company history, knowhow, trade secrets, and other nonpublic information related to Company, its affiliates and operations. City shall not, at any time during the term of this agreement or at any time thereafter, disclose to any person or entity, any confidential information, except as may be required by court order or law.
20. AMENDMENT: This Agreement may only be amended by written document duly executed by both of the Parties. No modification or waiver of any provision of this Agreement shall be valid unless duly authorized as an amendment hereof and duly executed by the City and the Company.
21. EXPIRATION: This Agreement will automatically expire two years from the Effective Date if the Company has not received final approval from the Licensing Authorities, unless an extension is agreed upon in writing by both parties.

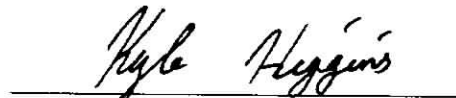
The following signatures indicate that the parties hereby agree to the terms set forth in this Host Community Agreement as per the date set forth on page 1 of this agreement.

City of Gardner

Jolly Green, Inc.manu



Michael J. Nicholson
Mayor



Print name: Kyle Higgins
President

[illegible]

Attachment A
Gardner News

Order Confirmation

<u>Ad Order Number</u> 0000474560	<u>Customer</u> CITY OF GARDNER PLANNING BOARD	<u>Payer Customer</u> CITY OF GARDNER PLANNING	<u>PO Number</u>
<u>Sales Rep.</u> ISC.derek.lindberg	<u>Customer Account</u> 1000010801	<u>Payer Account</u> 1000010801	<u>Ordered By</u> Kyle Higgins
<u>Order Taker</u> ISC.derek.lindberg	<u>Customer Address</u> 115 PLEASANT ST., CITY HALL ANNEX, ROOM 20 GARDNER MA 01440 USA	<u>Payer Address</u> 115 PLEASANT ST., CITY HALL ANNEX, ROOM 20 GARDNER MA 01440 USA	<u>Customer Fax</u>
<u>Order Source</u> E-mail	<u>Customer Phone</u> 978-630-4011	<u>Payer Phone</u> 978-630-4011	<u>Customer Email</u> cfucile@gardner-ma.gov
			<u>Special Pricing</u> None

<u>Tear Sheets</u> 0	<u>Proofs</u> 0	<u>Affidavits</u> 1	<u>Blind Box</u>	<u>Promo Type</u>	<u>Materials</u>
<u>Invoice Text</u>				<u>Ad Order Notes</u>	

<u>Ad Number</u> 0000474560-01	<u>Ad Type</u> 1Legal	<u>Ad Size</u> : 2.0 X 2.5000"	<u>Color</u> <NONE>	<u>Production Method</u> AdBooker	<u>Production Notes</u>	<u>Net Amount</u> \$96.25	<u>Tax Amount</u> \$0.00	<u>Total Amount</u> \$96.25	<u>Payment Method</u>	<u>Payment Amount</u> \$0.00	<u>Amount Due</u> \$96.25
<u>External Ad Number</u>	<u>Ad Attributes</u>	<u>Ad Released</u> No	<u>Pick Up</u> 0000473407								

<u>Product Information</u> <u>Run Schedule Invoice Text</u>	<u>Placement/Classification</u> <u>Sort Text</u>	<u>Run Dates</u>	<u># Inserts</u>	<u>Cost</u>
3GAR::	1Legal Notices - CLS	8/4/2021	1	\$96.25
CITY OF GARDNER LEGAL NOTICE Commur CITYOFGARDNERLEGALNOTICECOMMUNI				

Attachment A
Gardner News

[Back \(/Search.aspx#searchResults\)](#)

Notice Publish Date:

Wednesday, August 04, 2021

Notice Content

CITY OF GARDNER LEGAL NOTICE Community Outreach Meeting Notice is hereby given that a Community Outreach Meeting for a proposed Adult Use Marijuana Cultivation Facility is scheduled for August 19, 2021 at 6:00pm at the Elks Lodge 31 Park St Gardner MA 01440. The proposed Adult Use Marijuana Cultivation Facility is anticipated to be located at 246 Suffolk Lane Gardner MA 01440. (also known on Book 44016 Page 0305) by Jolly Green, Inc. of the same address. Any person wishing to participate or provide comment is strongly encouraged to attend where there will be an opportunity for the public to ask questions. The meeting room is accessible to persons with disabilities. By: Jolly Green Inc Kyle Higgins (978) 297-7065

[Back \(/Search.aspx#searchResults\)](#)

Use of this site is governed by our [Terms of Use \(/Terms-of-Use.aspx\)](#) agreement. If you have any questions please send an email to the administrator (<mailto:publicnotices@njpa.org>).

Select Language

Powered by [Google Translate \(https://translate.google.com\)](https://translate.google.com)

Attachment B

RECEIVED

2021 AUG -6 AM 8:51

CITY CLERK'S OFFICE
GARDNER, MA

CITY OF GARDNER

LEGAL NOTICE

Community Outreach Meeting

Notice is hereby given that a Community Outreach Meeting for a proposed Adult Use Marijuana Cultivation Facility is scheduled for August 19, 2021 at 6:00pm at the Elks Lodge 31 Park St Gardner MA 01440. The proposed Adult Use Marijuana Cultivation Facility is anticipated to be located at 246 Suffolk Lane Gardner MA 01440. (also known on Book 44016 Page 0305) by Jolly Green, Inc. of the same address. Any person wishing to participate or provide comment is strongly encouraged to attend where there will be an opportunity for the public to ask questions. The meeting room is accessible to persons with disabilities.

By: Jolly Green Inc
Kyle Higgins
(978) 297-7065

Publication Date: August 02, 2021
Gardner News

Attachment C

7020 0640 0001 3610 9078

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

Gardner, MA 01440

OFFICIAL USE

Certified Mail Fee	\$3.60	0462 06
Extra Services & Fees (check box, add fee as appropriate)	\$2.85	
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.55	
Total Postage and Fees	\$7.00	

Postmark Here
03 2021
08/03/2021

Sent To
Gardner Redevelopment Authority
115 Pleasant St. Rm 200
Gardner, MA, 01440

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

7020 0640 0001 3610 9061

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

Gardner, MA 01440

OFFICIAL USE

Certified Mail Fee	\$3.60	0462 06
Extra Services & Fees (check box, add fee as appropriate)	\$2.85	
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.55	
Total Postage and Fees	\$7.00	

Postmark Here
03 2021
08/03/2021

Sent To
Advanced Realty LLC c/o Advanced Cable Ties
245 Suffolk Ln
Gardner, MA, 01440

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

A Hochmest
C

CITY OF GARDNER
CERTIFIED ABUTTERS LIST

Parcel ID	Location	Owner	Owner2	Mailing Address	City	State	Zip
37-21-16	245 SUFFOLK LN	ADVANCED REALTY LLC	C/O ADVANCED CABLE TIES	245 SUFFOLK LN	GARDNER	MA	01440
32-2-1	SUFFOLK LN	GARDNER REDEVELOPMENT AUTHORITY		115 PLEASANT ST RM 200	GARDNER	MA	01440
32-7-1	SUFFOLK LN	GARDNER REDEVELOPMENT AUTHORITY		115 PLEASANT ST RM 200	GARDNER	MA	01440
37-21-7	SUFFOLK LN	GARDNER REDEVELOPMENT AUTHORITY		115 PLEASANT ST RM 200	GARDNER	MA	01440
37-22-17	SUFFOLK LN	GARDNER REDEVELOPMENT AUTHORITY		115 PLEASANT ST RM 200	GARDNER	MA	01440

Location: 246 SUFFOLK LN

PID: X32-2-18

Owner: WENDY & KYLE HIGGINS

Type: PLANNING BOARD
GIS Date: 6/30/20
CAMA Date: 5/31/21

This is to certify that at the time of the last assessment for taxation made by the City of Gardner, the above names and address and the parties assessed as adjoining owners to the proposed property.

Assessors Signature



Date:

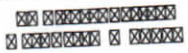
6/23/21



- Subject Property
- 300' Buffer
- Abutters
- Parcels

246 SUFFOLK LANE
X32-2-18

CITY OF GARDNER



Data Sources
City of Gardner GIS,
Office of Geographic and
Environmental Information (MassGIS),
Commonwealth of Massachusetts, EDEA



Plan to Remain Compliant with Local Zoning

Jolly Green Inc. shall be compliant with Massachusetts cannabis state law 935 CMR 500. Jolly Green Inc will also remain compliant City of Gardner adult-use cannabis zoning law 6.12. All marijuana establishments require a special permit issued by the Gardner Planning board. Jolly Green will be required and shall be compliant with the City of Gardner's marijuana special permit. Annually CEO will contact the Gardner Zoning and Planning board to review any changes with local zoning pertaining to 246 Suffolk Lane. By doing so will ensure Jolly Green Inc will remain compliant with local zoning changes and laws.

Host community cost response

To Whom It May Concern:

Jolly Green Inc of 246 Suffolk Lane Gardner MA MC283508 has contacted our host community the City of Gardner to request any or anticipated cost with our operation and or facility. As of 09/06/2022 we have not received a response from our host community.

Thank you

Kyle Higgins

Jolly Green

246 Suffolk Lane

Gardner MA 01440

From: Kyle Higgins jlygrn1@gmail.com
Subject: CCC renewal
Date: September 7, 2022 at 1:15 PM
To: Mayor Mayor@gardner-ma.gov
Cc: higginsmechanical1@gmail.com

KH

Hello,

Our cannabis cultivation license is coming up for renewal in November. Part of the renewal application is that we request any funds the City of Gardner would like reimbursement on pertaining to the operation of our cultivation facility. Please forward a list if one is available.

Kyle Higgins
Jolly Green
246 Suffolk Lane
Gardner MA 01440
jlygrn1@gmail.com

Positive Impact Plan
Jolly Green Inc
60 Franklin St Winchendon MA 01475

About us:

Jolly Green was established in 2018 for the purpose of adult use cannabis cultivation and is located at 60 Franklin St. Winchendon Massachusetts, and applying for a tier one cultivation license. Furthermore, within a two-year time frame we are planning on applying for a tier two license for a 2nd location at 246 Suffolk Lane at Gardner Massachusetts.

Through the legalization of cannabis this has created an opportunity for many small businesses to come into existence. In doing so establishing well-paying jobs within Massachusetts in the cannabis industry. Currently Jolly Green is startup owner operated company and intends on creating jobs and supporting businesses from areas negatively impacted by the legalization of cannabis.

I feel we have a moral and ethical obligation to society. Thus, Jolly Green will promote a positive impact in communities identified as disproportionately impacted by the prohibition of cannabis. This will be done by the following Positive Impact plan that is outlined.

Positive Impact Plan Goals:

- Jolly Green will provide a positive impact on communities identified as disproportionately impacted by the prohibition of cannabis. Jolly Green will increase the number of individuals working in the cannabis industry from identified communities, such as Fitchburg and Worcester Massachusetts. Our plan is to hire 1 # individual per year from the above identified communities.
- Jolly Green will promote a positive impact on communities in its external business operations. By contracting and using vendors located in communities identified as disproportionately impacted areas such as Worcester and Fitchburg Massachusetts.

This will be accomplished by contracting out 50% of our vendors from Fitchburg and Worcester communities.

Programs:

Promoting community positive Impact within Jolly Green internal business operations:

- Jolly Green will provide a positive impact on areas disproportionately impacted by the prohibition of cannabis in its internal business operations. Jolly green will give hiring preference to individuals that fall under the Commissions definition of disproportionately impacted areas. This process will include Jolly Green attending Equal Opportunity Career Fairs to attract potential employees. The career fairs will be marketed directly in communities identified as disproportionately impacted areas such as Worcester and Fitchburg Massachusetts. Jolly Green intends on attending 2 # job fairs per year.

Promoting community positive impact within Jolly Green external business operations:

- Jolly Green will create economic opportunity for diverse individually owned businesses located in communities identified as disproportionately impacted areas. The State Massachusetts offers a program through the Supplier Diversity Office that Jolly Green will use. By utilizing this tool, we will research and establish business relationships. Jolly Green will target businesses owned by diverse individuals located in communities identified as disproportionately impacted areas, such as Fitchburg and Worcester Massachusetts. Jolly Green intends on establishing business relationships with 50% or more vendors from the above listed communities.

Measurements and accountability:

- **Program #1**

Employee community positive impact program, Jolly Green compliance management will review and perform internal audits 4 times a year to ensure progress towards positive impact goals.

Jolly Green will attend career fairs that are marketed directly in communities identified as disproportionately impacted areas such as Worcester and Fitchburg Massachusetts. Jolly Green intends on employing one or more individuals from communities identified as disproportionately impacted over the first year. Jolly Green will count the number of individuals who have been hired annually. This will be done to ensure we meet our goal of hiring 1 # individual from the above listed communities per year.

- **Program #2**

Vendor and contractor positive impact program, Jolly Green compliance management will review and perform an audit one time a year to ensure progress towards vendor and contractor positive impact goals. Jolly Green will use the Massachusetts Supplier Diversity Office program to procure vendors and contracts with diverse business owners located in communities identified as disproportionately impacted. Jolly Green intends on hiring and contracting with 2 # or more vendors utilizing this program over the first year. Jolly Green will count the number vendors who have been hired annually. This will be done to ensure we meet our goal of hiring 50% or more vendors from the above listed communities per year.

Positive Impact Plan timeline to demonstrate progress or success.

Jolly Green acknowledges that the progress or success of our plan will be documented upon renewal (one year from provisional licensure, and each year thereafter).

- Month One: Positive Impact Plan Commences
- Month Three: Promoting community positive Impact within Jolly Green internal business operations commences
- Month Four: Promoting community positive impact within Jolly Green external business operations commences.
- Month Nine: Jolly Green will attend career fairs that are marketed directly in communities identified

- as disproportionately impacted areas such as Worcester and Fitchburg.
- Month Eleven: Jolly Green will use the Massachusetts Supplier Diversity Office program to procure vendors and contracts with diverse business owners located in communities identified as disproportionately impacted
- Month Twelve: Jolly Green compliance management will review and perform an audit. Jolly Green acknowledges that the progress or success of our plan will be documented upon renewal (one year from provisional licensure, and each year thereafter
-

Jolly Green Inc required acknowledgements:

Jolly Green Inc 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; Any actions taken, or programs instituted, by Jolly Green Inc

will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.



The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$250.00

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

Articles of Organization

General Laws, Chapter 156D, Sections 2.01 to 2.09, 2.10 to 2.13, 2.14

Identification Number: 001325206

ARTICLE I

The exact name of the corporation is:

JOLLY GREEN, INC.

ARTICLE II

Unless the articles of organization otherwise provide, all corporations formed pursuant to G.L. C156D have the purpose of engaging in any lawful business. Please specify if you want a more limited purpose:

ARTICLE III

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

Class of Stock	Par Value Per Share Enter 0 if no Par	Total Authorized by Articles of Organization or Amendments		Total Issued and Outstanding Num of Shares
		Num of Shares	Total Par Value	
CWP	\$0.00100	100	\$0.10	100

G.L. C156D eliminates the concept of par value, however a corporation may specify par value in Article III. See G.L. C156D Section 6.21 and the comments thereto.

ARTICLE IV

If more than one class of stock is authorized, state a distinguishing designation for each class. Prior to the issuance of any shares of a class, if shares of another class are outstanding, the Business Entity must provide a description of the preferences, voting powers, qualifications, and special or relative rights or privileges of that class and of each other class of which shares are outstanding and of each series then established within any class.

ARTICLE V

The restrictions, if any, imposed by the Articles of Organization upon the transfer of shares of stock of any class are:

ARTICLE VI

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

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

ARTICLE VII

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

Later Effective Date: Time:

ARTICLE VIII

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

a,b. The street address of the initial registered office of the corporation in the commonwealth and the name of the initial registered agent at the registered office:

Name: KYLE HIGGINS
No. and Street: 279 HOLLY DRIVE
City or Town: WINCHENDON State: MA Zip: 01475 Country: USA

c. The names and street addresses of the individuals who will serve as the initial directors, president, treasurer and secretary of the corporation (an address need not be specified if the business address of the officer or director is the same as the principal office location):

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
PRESIDENT	KYLE HIGGINS	60 FRANKLIN ST. WINCHENDON, MA 01475 USA
TREASURER	KYLE HIGGINS	60 FRANKLIN ST. WINCHENDON, MA 01475 USA
SECRETARY	KYLE HIGGINS	60 FRANKLIN ST. WINCHENDON, MA 01475 USA
DIRECTOR	KYLE HIGGINS	60 FRANKLIN ST. WINCHENDON, MA 01475 USA

d. The fiscal year end (i.e., tax year) of the corporation:
January

e. A brief description of the type of business in which the corporation intends to engage:

AGRICULTURE- FARMING.

f. The street address (post office boxes are not acceptable) of the principal office of the corporation:

No. and Street: 60 FRANKLIN ST.
City or Town: WINCHENDON State: MA Zip: 01475 Country: USA

g. Street address where the records of the corporation required to be kept in the Commonwealth are located (post office boxes are not acceptable):

No. and Street: 60 FRANKLIN ST.

EXHIBIT A
BYLAWS OF
Jolly Green, Inc.

BYLAWS
OF
Jolly Green, Inc.,
a Massachusetts Corporation

ARTICLE I

Section 1.1. Annual Meetings. An annual meeting of the shareholders of Jolly Green, Inc. (the "Corporation") will be held for the election of directors on a date and at a time and place either within or without the commonwealth of Massachusetts fixed by resolution of the Board of Directors and within six months after the end of the fiscal year.

Any other proper business may be transacted at the annual meeting, except as limited by any notice or other requirements under the Massachusetts Business Corporation Act.

Section 1.2. Special Meetings. Special meetings of the shareholders may be called at any time by the holders of shares entitled to cast not less than 10% of the votes at the meeting, such meeting to be held on a date and at a time and place either within or without the Commonwealth of Massachusetts as may be stated in the notice of the meeting.

Section 1.3. Notice of Meetings. Whenever shareholders are required or permitted to take any action at a meeting a written notice of the meeting must be given not less than ten (10) nor more than sixty (60) days before the date of the meeting to each shareholder entitled to vote thereat, except that meetings to increase the number of shares or corporate indebtedness each require at least 60 days' notice.

Notice of a shareholders' meeting or any report must be given either personally or by first-class mail or other means of written communication, addressed to the shareholder at the address of such shareholder appearing on the books of the Corporation or given by the shareholder to the Corporation for the purpose of notice. The notice shall be deemed to have been given at the time when delivered personally or deposited in the mail or sent by other means of written communication.

Section 1.4. Adjournments. When a shareholders' meeting is adjourned to another time or place, except as otherwise provided in this Section, notice need not be given of any such adjourned meeting if the date, time and place thereof are announced at the meeting at which the adjournment is taken. At the adjourned meeting the Corporation may transact any business which might have been transacted at the original meeting. If the adjournment is for more than 45 days or if after the adjournment a new record date is fixed for the adjourned meeting, a notice of the adjourned meeting shall be given to each shareholder of record entitled to vote at the meeting.

Section 1.5. Validating Meeting of Shareholders; Waiver of Notice. The transactions of any meeting of shareholders, however called and noticed, and wherever held, are as valid as though had at a meeting duly held after regular call and notice, if a quorum is present either in person or by proxy, and if, either before or after the meeting, each of the persons entitled to vote, not present in person or by proxy, signs a written waiver of notice or a consent to the holding of the meeting or an approval of the minutes thereof. All such waivers, consents and approvals shall be filed with the corporate records or made a part of the minutes of the meeting. Attendance of a person at a meeting shall constitute a waiver of notice of and presence at such meeting, except when the person objects, at the beginning of the meeting, to the transaction of any business because the meeting is not lawfully called or convened and except that attendance at a meeting is not a waiver of any right to object to the consideration of matters required by law to be included in the notice but not so included, if such objection is expressly made at the meeting. Neither the business to be transacted at nor the purpose of any regular or special meeting of shareholders need be specified in any written waiver of notice, consent to the holding of the meeting or approval of the minutes thereof, except as required by the Massachusetts Business Corporation Act.

Section 1.6. Quorum. A majority of the shares entitled to vote, represented in person or by proxy, shall constitute a quorum at a meeting of the shareholders.

The shareholders present at a duly called or held meeting at which a quorum is present may continue to transact business until adjournment notwithstanding the withdrawal of enough shareholders to leave less than a quorum, if any action taken (other than adjournment) is approved by at least a majority of the shares required to constitute a quorum. In the absence of a quorum, any meeting of shareholders may be adjourned from time to time by the vote of a majority of the shares represented either in person or by proxy, but no other business may be transacted, except as provided in this Section.

Section 1.7. Organization. Meetings of shareholders shall be presided over by the Chairman of the Board of Directors, if any, or in the absence of the Chairman of the Board of Directors by the Vice Chairman of the Board of Directors, if any, or in the absence of the Vice Chairman of the Board of Directors by the President, or in the absence of the foregoing persons by a chairman designated by the Board of Directors, or in the absence of such designation by a chairman chosen at the meeting. The Secretary, or in the absence of the Secretary, an Assistant Secretary, shall act as secretary of the meeting, or in their absence the chairman of the meeting may appoint any person to act as secretary of the meeting.

Section 1.8. Voting. Unless otherwise provided in the Articles of Organization, each outstanding share, regardless of class, shall be entitled to one vote on each matter submitted to a vote of shareholders.

Any holder of shares entitled to vote on any matter may vote part of the shares in favor of the proposal and refrain from voting the remaining shares or vote them against the proposal, other than elections to office, but, if the shareholder fails to specify the number of shares such shareholder is voting affirmatively, it will be conclusively presumed that the shareholder's approving vote is with respect to all shares such shareholder is entitled to vote.

Directors shall be elected by a plurality of the votes of the shares present in person or represented by proxy at the meeting and entitled to vote on the election of directors.

In all other matters, unless otherwise provided by Massachusetts law or by the Articles of Organization or these bylaws, the affirmative vote of the holders of a majority of the shares entitled to vote on the subject matter at a meeting in which a quorum is present shall be the act of the shareholders. Where a separate vote by class or classes is required, the affirmative vote of the holders of a majority of the shares of such class or classes at a meeting in which a quorum is present shall be the act of such class or classes, except as otherwise provided by the state of Massachusetts law or by the Articles of Organization or these bylaws.

Section 1.9. Shareholder's Proxies. At all meetings of shareholders, a shareholder may vote by proxy executed in writing by the shareholder or by his or her duly authorized attorney-in-fact.

Such proxy shall be filed with the Secretary of the Corporation before or at the time of the meeting. No proxy shall be valid after the expiration of 11 months from the date thereof unless otherwise provided in the proxy. Every proxy continues in full force and effect until revoked by the person executing it prior to the vote pursuant thereto, except as otherwise provided in this Section. Such revocation may be effected by a writing delivered to the Corporation stating that the proxy is revoked or by a subsequent proxy executed by the person executing the prior proxy and presented to the meeting, or as to any meeting by attendance at such meeting and voting in person by the person executing the proxy.

Section 1.10. Inspectors. In advance of any meeting of shareholders the Board of Directors may appoint inspectors of election to act at the meeting and any adjournment thereof.

Section 1.11. Fixing Date for Determination of Shareholders of Record. In order that the Corporation may determine the shareholders entitled to notice of any meeting or to vote or to express consent to corporate action in writing without a meeting or entitled to receive payment of any dividend or other distribution or allotment of any rights or entitled to exercise any rights in respect of any other lawful action, the Board of Directors may fix, in advance, a record date, which shall not be more than 60 nor less than ten days prior to the date of such meeting nor more than 60 days prior to any other action.

If no record date is fixed:

- a) the record date for determining shareholders entitled to notice of or to vote at a meeting of shareholders shall be at the close of business on the business day next preceding the day on which notice is given or, if notice is waived, at the close of business on the business day next preceding the day on which the meeting is held;
- b) the record date for determining shareholders entitled to give consent to corporate action in writing without a meeting, when no prior action by the Board of Directors has been taken, shall be the day on which the first written consent is given; and
- c) the record date for determining shareholders for any other purpose shall be at the close of business on the day on which the Board of Directors adopts the resolution relating thereto or the 60th day prior to the date of such other action, whichever is later. When a determination of shareholders entitled to vote at any meeting of shareholders has been made as provided in this Section, such determination shall apply to any adjournment thereof.

Section 1.12. Consent of Shareholders in Lieu of Meeting. Except as otherwise provided in the Articles of Organization or under the Massachusetts Business Corporation Act, any action that may be taken at any annual or special meeting of the shareholders may be taken without a meeting and without prior notice, if a consent in writing, setting forth the action so taken, shall be signed by the holders of all outstanding shares.

ARTICLE II

Board of Directors

Section 2.1. Powers; Number; Qualifications. The business and affairs of the Corporation shall be managed by, and all corporate powers shall be exercised by or under, the direction of the Board of Directors, except as otherwise provided in these bylaws or Articles of Organization.

The number of directors comprising the initial Board of Directors shall be set forth in the Articles of Incorporation. The Board of Directors may be enlarged by the shareholders at any meeting or by vote of a majority of the directors then in office, provided that, the number of directors shall not be less than three whenever the Corporation has three or more shareholders, and shall not be less than two whenever the Corporation has two shareholders.

Section 2.2. Election; Term of Office; Resignation; Vacancies. At each annual meeting of shareholders, directors shall be elected to hold office until the next annual meeting. Each director, including a director elected to fill a vacancy, shall hold office until the expiration of the term for which elected and until a successor has been elected and qualified. Any director may resign effective upon giving written notice to the Chairman of the Board of Directors, the Secretary of the Board of Directors, or the Board of Directors of the Corporation, unless the notice specifies a later time for the effectiveness of such resignation. If the resignation is effective at a future time, a successor may be elected to take office when the resignation becomes effective.

Subject to the provisions of the Massachusetts Business Corporation Act, any director may be removed with or without cause at any time by the shareholders of the Corporation at a special meeting called for such purpose. In addition, any director may be removed for cause by action of the Board of Directors.

Unless otherwise provided in the Articles of Organization or these bylaws and except for a vacancy caused by the removal of a director, vacancies on the Board of Directors may be filled by appointment by the Board of Directors. The shareholders may elect a director at any time to fill a vacancy not filled by the Board of Directors.

Section 2.3. Regular Meetings. Regular meetings of the Board of Directors may be held without notice at such places within or without the commonwealth of Massachusetts and at such times as the Board of Directors may from time to time determine.

Section 2.4. Special Meetings; Notice of Meetings; Waiver of Notice. Special meetings of the Board of Directors may be held at any time or place within or without the commonwealth of Massachusetts whenever called by the Chairman of the Board of Directors, by the Vice Chairman of the Board of Directors, if any, or by any two directors. Subject to any greater notice requirements set forth in the Massachusetts Business Corporation Act, special meetings shall be held on five days' notice by mail or 48 hours' notice delivered personally or by telephone, telegraph or any other means of communication authorized by the Massachusetts Business Corporation Act. Notice delivered personally or by telephone may be transmitted to a person at the director's office who can reasonably be expected to deliver such notice promptly to the director.

Notice of a meeting need not be given to any director who signs a waiver of notice or a consent to holding the meeting or an approval of the minutes thereof, whether before or after the meeting, or who attends the meeting without protesting, prior thereto or at its commencement, the lack of notice to such director. All such waivers, consents and approvals shall be filed with the corporate records or made a part of the minutes of the meeting. A notice, or waiver of notice, need not specify the purpose of any regular or special meeting of the Board of Directors.

Section 2.5. Participation in Meetings by Conference Telephone Permitted. Members of the Board of Directors, or any committee designated by the Board of Directors, may participate in a meeting of the Board or of such committee, as the case may be, through the use of conference telephone or similar communications equipment permitted by the Massachusetts Business Corporation Act, so long as all members participating in such meeting can hear one another, and participation in a meeting pursuant to this Section shall constitute presence in person at such meeting.

Section 2.6. Quorum; Adjournment; Vote Required for Action. At all meetings of the Board of Directors a majority of the authorized number of directors shall constitute a quorum for the transaction of business. Subject to the provisions of the Massachusetts Business Corporation Act, every act or decision done or made by a majority of the directors present at a meeting at which a quorum is present shall be the act of the Board unless the Articles of Organization or these bylaws shall require a vote of a greater number.

A majority of the directors present, whether or not a quorum is present, may adjourn any meeting to another time and place. If the meeting is adjourned for more than 24 hours, notice of any adjournment to another time or place shall be given prior to the time of the adjourned meeting to the directors who were not present at the time of the adjournment.

Section 2.7. Organization. Meetings of the Board of Directors shall be presided over by the Chairman of the Board of Directors, or in the absence of the Chairman of the Board by the Vice Chairman of the Board of Directors, if any, or in their absence by a chairman chosen at the meeting. The Secretary, or in the absence of the Secretary, an Assistant Secretary, will act as secretary of the meeting, but in the absence of the Secretary and any Assistant Secretary the chairman of the meeting may appoint any person to act as secretary of the meeting.

Section 2.8. Action by Directors Without a Meeting. Any action required or permitted to be taken by the Board of Directors, or any committee thereof, may be taken without a meeting if all members of the Board or of such committee, as the case may be, shall individually or collectively consent in writing to such action. Such written consent or consents shall be filed with the minutes of the proceedings of the Board of Directors. Such action by written consent shall have the same force and effect as a unanimous vote of such directors.

Section 2.9. Compensation of Directors. The Board of Directors shall have the authority to fix the compensation of directors for services in any capacity.

ARTICLE III

Executive and Other Committees

Section 3.1. Executive and Other Committees of Directors. The Board of Directors, by resolution adopted by a majority of the authorized number of directors, may designate an executive committee and other committees, each consisting of two or more directors, to serve at the pleasure of the Board of Directors, and each of which, to the extent provided in the resolution but subject to the Massachusetts Business Corporation Act, will have all the authority of the Board.

The Board of Directors may designate one or more directors as alternate members of any such committee, who may replace any absent member or members at any meeting of such committee.

Unless the Board of Directors otherwise provides, each committee designated by the Board may adopt, amend and repeal rules for the conduct of its business. In the absence of a provision by the Board of Directors or a provision in the rules of such committee to the contrary, each committee shall conduct its business in the same manner as the Board of Directors conducts its business pursuant to Article II of these bylaws.

ARTICLE IV

Officers

Section 4.1. Officers; Election. As soon as practicable after the annual meeting of shareholders each year, the Board of Directors shall appoint a President, a Treasurer and a Secretary. The Board may also elect one or more Vice Presidents, one or more Assistant Secretaries, and such other officers as the Board may deem desirable or appropriate and may give any of them such further designations or alternate titles as it considers desirable. Any number of offices may be held by the same person.

Section 4.2. Term of Office; Resignation; Removal; Vacancies. Except as otherwise provided in the resolution of the Board of Directors electing any officer, each officer will hold office until his or her successor is elected and qualified or until his or her earlier resignation or removal. Any officer may resign at any time upon written notice to the Board or to the Chairman of the Board or the Secretary of the Corporation. Such resignation will take effect when the notice is delivered, unless the notice specifies a later time, and unless otherwise specified therein no acceptance of such resignation will be necessary to make it effective. The Board may remove any officer with or without cause at any time. Any such removal will be without prejudice to the contractual rights of such officer, if any, with the Corporation, but the election of an officer will not of itself create contractual rights. Any vacancy occurring in any office of the Corporation by death, resignation, removal or otherwise may be filled for the unexpired portion of the term by the Board at any regular or special meeting.

Section 4.3. Powers and Duties. The officers of the Corporation will have such powers and duties in the management of the Corporation as are stated in these bylaws or in a resolution of the Board of Directors that is not inconsistent with these bylaws and, to the extent not so stated, as generally pertain to their respective offices, subject to the control of the Board of Directors. The Secretary will have the duty to record the proceedings of the meetings of the shareholders, the Board of Directors and any committees in a book to be kept for that purpose.

Section 4.4. Salaries. The salaries, compensation and other benefits, if any, of the officers will be fixed from time to time by the Board of Directors, and no officer will be prevented from receiving such salary by reason of the fact that he or she is also a Director of the Corporation.

ARTICLE V

Forms of Certificates; Loss and Transfer of Shares

Section 5.1. Forms of Certificates. Every holder of shares in the Corporation is entitled to have a certificate signed in the name of the Corporation by (1) the President, any Vice President, Chairman of the Board or Vice Chairman, and by (2) the Chief Financial Officer, Treasurer, Assistant Treasurer, or Secretary of the Corporation, certifying the number of shares and the class or series of shares owned by such shareholder. If such certificate is manually signed by at least one officer or manually countersigned by a transfer agent or by a registrar, then any other signature on the certificate may be a facsimile signature. In case any officer, transfer agent or registrar who has signed or whose facsimile signature has been placed upon a certificate shall have ceased to be such officer, transfer agent or registrar before such certificate is issued, it may be issued by the Corporation with the same effect as if such person were such officer, transfer agent or registrar at the date of issue.

Section 5.2. Lost, Stolen or Destroyed Share Certificates; Issuance of New Certificates. The Corporation may issue a new share certificate or a new certificate for any other security in the place of any certificate theretofore issued by it, alleged to have been lost, stolen or destroyed, and the Corporation may require the owner of the lost, stolen or destroyed certificate, or such owner's legal representative, to give the Corporation a bond sufficient to indemnify it against any claim that may be made against it (including any expense or liability) on account of the alleged loss, theft or destruction of any such certificate or the issuance of such new certificate.

ARTICLE VI

Records and Reports

Section 6.1. Shareholder Records. The Corporation shall keep at its principal executive office or at the office of its transfer agent or registrar a record of the names and addresses of all shareholders and the number and class of shares held by each shareholder.

Section 6.2. Corporate Documents and Bylaws. The Corporation shall keep at its principal executive office the original or a copy of the Articles of Organization and bylaws as amended which shall be open to inspection by the shareholders at all reasonable times during office hours. The Corporation shall, upon the written request of any shareholder, furnish to that shareholder a copy of the Articles of Organization or bylaws as amended to date.

Section 6.3. Minutes and Accounting Records. The minutes of proceedings of the shareholders, the Board of Directors, and committees of the Board, and the accounting books and records will be kept at the principal executive office of the Corporation, or at such other place or places as designated by the Board of Directors. The minutes will be kept in written form, and the accounting books and records will be kept either in written form or in a form capable of being converted into written form.

Section 6.4. Inspection by Directors. Subject to applicable Massachusetts law, every director shall have the right at any reasonable time to inspect all books, records, and documents of every kind and the physical properties of the Corporation and each of its subsidiary corporations for purposes relating to his or her status as director. This inspection by a director may be made in person or by an agent or attorney and the right of inspection includes the right to copy and make extracts of documents.

Section 6.5. Annual Report to Shareholders. Subject to the Massachusetts Business Corporation Act, for as long as the Corporation has fewer than the number of shareholders specified in the applicable statute, if any, any requirement of an annual report to shareholders is expressly waived. However, nothing in this provision shall be interpreted as prohibiting the Board of Directors from issuing annual or other periodic reports to the shareholders, as the Board considers appropriate.

At the annual meeting of shareholders, or the meeting held in lieu thereof, the Corporation shall lay before the shareholders a financial statement consisting of:

- a) A balance sheet containing a summary of the assets, liabilities, stated capital, if any, and surplus (showing separately any capital surplus arising from unrealized appreciation of assets, other capital surplus, and earned surplus) of the Corporation as of the end of the Corporation's most recent fiscal year, except that, if consolidated financial statements are laid before the shareholders, the consolidated balance sheet shall show separately or disclose by a note the amount of the consolidated surplus that does not constitute earned surplus of the Corporation or any of its subsidiaries and that is not classified as stated capital or capital surplus on the consolidated balance sheet; and
- b) A statement of profit and loss and surplus, including a summary of profits, dividends or distributions paid, and other changes in the surplus accounts of the Corporation for the period commencing with the date marking the end of the period for which the last preceding statement of profit and loss required under this Section was made and ending with the date of said balance sheet, or in the case of the first statement of profit and loss, from the incorporation of the Corporation to the date of said balance sheet.

Section 6.6. Financial Statements. The Corporation shall keep a copy of each annual financial statement, quarterly or other periodic income statement, and accompanying balance sheets prepared by the Corporation on file in the Corporation's principal office for 3 years. These documents shall be exhibited at all reasonable times, or copies provided, to any shareholder on demand.

Section 6.7. Form of Records. Any records maintained by the Corporation in the regular course of its business, with the exception of minutes of the proceedings of the shareholders, and of the Board of Directors and its committees, but including the Corporation's stock ledger and books of account, may be kept on, or be in the form of magnetic tape, photographs, microphotographs or any other information storage device, provided that the records so kept can be converted into clearly legible form within a reasonable time. The Corporation shall so convert any records so kept upon the request of any person entitled to inspect the same.

ARTICLE VII

Miscellaneous

Section 7.1. Principal Executive or Business Offices. The Board of Directors shall fix the location of the principal executive office of the Corporation at any place either within or without the commonwealth of Massachusetts.

Section 7.2. Fiscal Year. The fiscal year of the Corporation must be determined by the Board of Directors.

Section 7.3. Seal. The Corporation may have a corporate seal which shall have the name of the Corporation inscribed thereon and shall be in such form as may be approved from time to time by the Board of Directors. The corporate seal may be used by causing it or a facsimile thereof to be impressed or affixed or in any other manner reproduced.

Section 7.4. Indemnification. The Corporation shall have the power to indemnify, to the maximum extent and in the manner permitted by the Massachusetts Business Corporation Act, each of its directors, officers, employees and agents against expenses, judgments, fines, settlements, and other amounts actually and reasonably incurred in connection with any proceeding arising by reason of the fact that such person is or was an agent of the Corporation.

Section 7.5. Contracts. The Board of Directors may authorize any officer or officers, agent or agents, to enter into any contract or execute and deliver any instrument in the name of and on behalf of the Corporation, and such authority may be general or confined to specific instances.

Section 7.6. Dividends. The Board of Directors may from time to time declare, and the Corporation may pay dividends on its outstanding shares in the manner and upon the terms and conditions provided by Massachusetts law and its Articles of Organization.

Section 7.7. Amendment of Bylaws. To the extent permitted by law, these bylaws may be amended or repealed, and new bylaws adopted, by the Board of Directors. The shareholders entitled to vote, however, retain the right to adopt additional bylaws and may amend or repeal any bylaw whether or not adopted by them.

Unless otherwise stated in the Articles of Organization, these bylaws may be amended or repealed, and new bylaws adopted, only by action of the shareholders.

[Remainder Intentionally Left Blank.]

CERTIFICATE OF SECRETARY OF

Jolly Green, Inc.

The undersigned, Kyle Higgins, as Secretary of Jolly Green, Inc., a Massachusetts corporation (the "Corporation"), hereby certifies the attached document is a true and complete copy of the bylaws of the Corporation and that such bylaws were duly adopted by the Board of Directors of the Corporation on the date set forth below.

IN WITNESS WHEREOF, the undersigned has executed this certificate as of
9-13, 2021.



Kyle Higgins
Secretary

EXHIBIT B
FORM OF SHARE CERTIFICATE



William Francis Galvin
Secretary of the
Commonwealth

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

Date: September 13, 2021

To Whom It May Concern :

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

JOLLY GREEN, INC.

is a domestic corporation organized on **April 30, 2018** , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



In testimony of which,
I have hereunto affixed the
Great Seal of the Commonwealth
on the date first above written.

William Francis Galvin

Secretary of the Commonwealth

Certificate Number: 21090256710

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

Processed by: bod



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

mass.gov/dor

Letter ID: L1985881280
Notice Date: September 14, 2021
Case ID: 0-001-279-939



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



JOLLY GREEN INC
25 NEW ATHOL RD BLDG 1
ORANGE MA 01364-9602

Why did I receive this notice?

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

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

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

What if I have questions?

If you have questions, call us at (617) 887-6400 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 9:00 a.m. to 4:00 p.m..

Visit us online!

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

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

Edward W. Coyle, Jr., Chief
Collections Bureau



THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF LABOR AND WORKFORCE DEVELOPMENT
DEPARTMENT OF UNEMPLOYMENT ASSISTANCE

Charles D. Baker
GOVERNOR

Karyn E. Polito
LT. GOVERNOR



369902168

Rosalin Acosta
SECRETARY

Richard A. Jeffers
DIRECTOR

Jolly Green Inc
60 FRANKLIN ST
WINCHENDON, MA 01475-1252

EAN: 22184803
September 14, 2021

Certificate Id:51400

The Department of Unemployment Assistance certifies that as of 9/14/2021 ,Jolly Green Inc is current in all its obligations relating to contributions, payments in lieu of contributions, and the employer medical assistance contribution established in G.L.c.149,§189.

This certificate expires in 30 days from the date of issuance.

Richard A. Jeffers, Director

Department of Unemployment Assistance



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

mass.gov/dor

Letter ID: L1985881280
Notice Date: September 14, 2021
Case ID: 0-001-279-939



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25 NEW ATHOL RD BLDG 1
ORANGE MA 01364-9602

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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



William Francis Galvin
Secretary of the
Commonwealth

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

Date: September 13, 2021

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

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In testimony of which,
I have hereunto affixed the
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William Francis Galvin

Secretary of the Commonwealth

Certificate Number: 21090256710

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

Processed by: bod

CONFIDENTIAL

Jolly Green Inc.

EIN ID number 82-5286266

Cannabis cultivation license MC281283

Cultivation Business Plan

Prepared May 2018

Contact Information

Kyle Higgins

Principle

higginsmechanical@comcast.net

978-502-3740

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1.1 COMPANY PURPOSE

Jolly Green is a new company in the Massachusetts recreational marijuana industry dedicated to cultivating cannabis. JG will work hard to become a leading producer in the cannabis industry.

JG's goal is to provide high-quality cannabis to all licensed marijuana establishments and processing facilities in Worcester and the surrounding areas.

1.2 COMPANY ORGANIZATION

JG is a corporation formed in 2018 by Kyle Higgins.

Services

JG will cultivate high-quality cannabis and cannabis plants. The company will distribute cannabis through wholesale transactions to qualified marijuana retail stores and other licensed facilities. We are a company whose ethos is creating high quality and safe cannabis. All of the marijuana products we distribute must first pass internal inspections and state-required inspections by licensed marijuana testing facilities before being provided to our end users.

1.3 THE MARKET

Recent research indicates that the cannabis industry has been growing steadily and rapidly since the passage of laws allowing the distribution of marijuana. According to Oakland-based marijuana angel investment network The ArcView Group (*Executive Summary, 4th Edition*),

national legal sales for 2015 grew to \$5.7 billion from \$4.6 billion in 2014, fueled by explosive growth in adult use market sales, which grew from \$373.8 million in 2014 to \$1.2 billion by the end of 2015, an increase of 232%.

Demand is expected to remain strong in 2016 with legal markets projected to grow to \$7.4 billion, a 29% increase over 2015. By 2020, legal market sales will grow to \$20.6 billion, with adult use sales comprising nearly two-thirds of the total market.

Twenty-eight states already permit medical cannabis use, and eight states and the District of Columbia allow full adult use. With nearly a dozen states debating changes to their cannabis laws in the coming

year, 2016 is the tipping point in which a majority of U.S. states transition from cannabis prohibition to some form of regulated legal markets.

According to the recent study made by ArcView, the legalization and regulation of adult use in Colorado and Washington have been a success. Many of the negative outcomes threatened by prohibitionists have not borne out. Crime is down, falling prices have made the legal market increasingly competitive against the black market, regulatory compliance is high as business dare not risk losing their valuable licenses, and product quality and diversity has increased. The success of these markets has provided the first clear evidence that legalization is a viable alternative to prohibition.

A recent report from the Department of Revenue in Colorado had shattering sales records this year, maintaining a wide margin over monthly sales in 2015. According to an update from Arcview, the state is on track to break \$1billion in sales in 2016 with total legal sales projected to break \$2 billion by 2020.

Washington is projected to have the second largest adult use market in the US. It is forecasted to grow from \$1.1 billion in 2016 to \$2 billion by 2020. With a 37% cannabis retail sales tax, the state's growth represents a significant revenue opportunity for the state.

According to a preliminary estimate by the Alaska Department of Revenue, the state stands to make between \$5.1 million and \$19.2 million in tax revenue from commercial marijuana this year.

California's medical sales already account for a large chunk of the total industry; as it legalizes recreational marijuana last November, as many expect, that alone could lead to a huge boom in industry sales.

In November 2016, voters legalized adult use of marijuana in Massachusetts, according to ArcView, the recreational cannabis market would top \$300 million in 2018, likely to be the first full year the business would be legal. Revenues would then nearly triple to more than \$900 million in 2020, which combined with the expected continued growth of medical marijuana sales would put the state's total marijuana market at \$1.17 billion.

It's clear by reviewing the revenue and market value figures that marijuana industry is poised for continued growth. The changing legal environment combined with changing public attitudes are all factors contributing to a perfect storm to cultivate industry growth.

With these figures and projections, it is easy to understand why observers are confident that legalizing, regulating, and taxing marijuana will generate plenty of revenue while creating jobs and better prioritizing law enforcement resources. As more state regulations continue to mature and evolve toward full legalization and acceptance of cannabis as a product with commercial value, demand is expected to increase in all segments of the industry. Production and distribution are positioned for exponential growth as new technologies and methods evolve and become more efficient and new, innovative product categories are born from these advancements.

1.4 THE OPPORTUNITY

The opportunities for businesses and investors are accelerating as marijuana legislation progresses across the nation. Business practices amongst the various different industries affected by new marijuana legislation are quickly professionalizing, adapting to new state regulations, and employing increasingly sophisticated business models to increase scales and access new markets. Marijuana is proving to be the next great American industry.

In Massachusetts, potential business owners will be able to establish retail stores, cultivation centers, processing and testing facilities. Those in the agricultural sector can expand into cultivating marijuana for retail stores and other marijuana businesses. Those in the chemical and biological sciences sector, have the opportunity to become laboratory-testing facilities for marijuana-processors and producers that want their products to be lab-tested. Food professionals and other marijuana-infused goods producers are able to create a variety of products for retail stores. Through the creation and success of all these new types of business, states and municipalities are able to tap a fresh, new source of tax revenue.

With the approval of the use of recreational marijuana of adults in Massachusetts, we can expect a more robust and stable regulatory landscape that will provide ample opportunities for cutting edge and proprietary retailers like Jolly Green.

From one perspective, one may think these recent developments in Massachusetts may make that market less competitive and less attractive from an opportunity standpoint. We believe these developments indicate that the Massachusetts market is a more attractive opportunity for those seeking to enter the state's recreational marijuana industry. Massachusetts has significant barriers to entry because of its licensing standards and process and, therefore, only those who have the profile and resources to satisfy those licensing standards have an opportunity to enter the Massachusetts market.

1.5 FINANCIAL SUMMARY

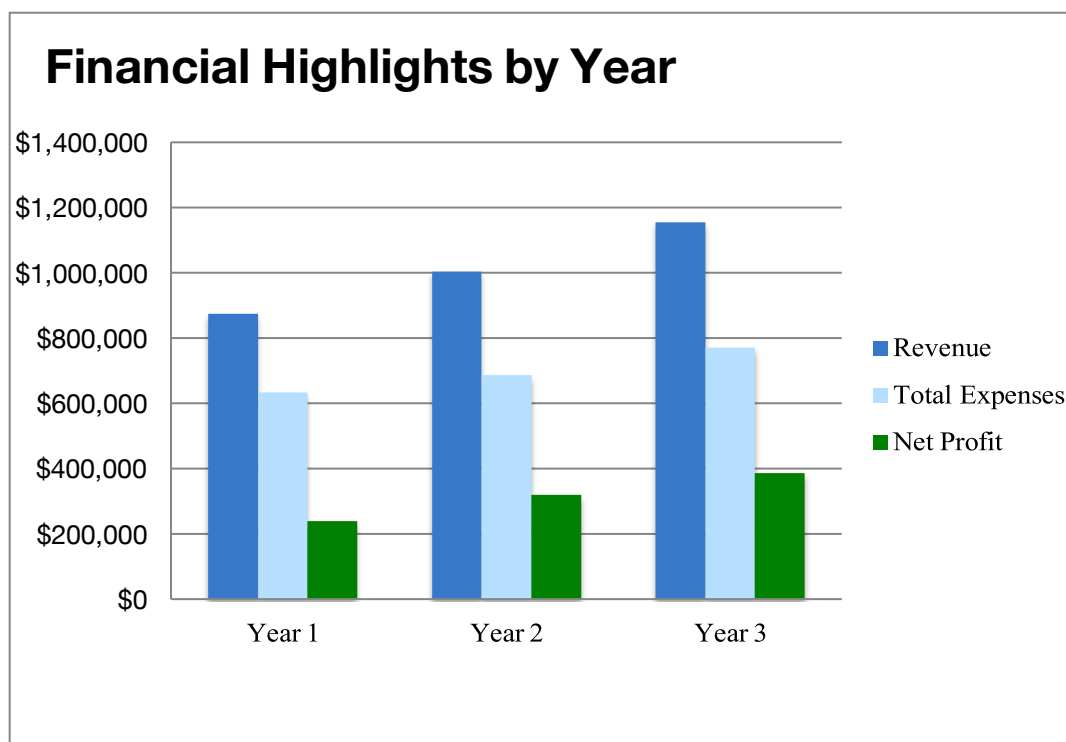
Jolly Green will fund its startup costs largely through a loan from Higgins Mechanical INC and personal savings.

Sales are expected to start conservatively the first few months and increase steadily through the third and fourth quarters of the first year of operations.

We plan to retain cash generated from operations and utilize it to cover cash required for operations and to fund future expansion opportunities as they arise.

Our strategy also includes a persistent search identifying operational inefficiencies and adjusting. Therefore, we anticipate that following our first year of operations, that JG will be able to reduce operating expenses as a result of operational experience, and industry knowledge.

1.5.1 Financial Highlights by Fiscal Year



Objectives

1. Net annual income to support full-time staff and expenses.
2. Monthly sales increasing steadily throughout FY.
3. Become profitable by the end of the first year of operations. See attached financials.

1.6 KEYS TO SUCCESS

JG believes in the following keys to success:

1. Focusing on cultivating high quality grade cannabis.
2. Maintaining exemplary cultivation standards and becoming a leading supplier of cannabis.
3. Working in conjunction with the local community to foster good will and understanding the effects of marijuana.
4. Building business relationships to foster and grow business-to-business sales by meeting with retailers, processors, laboratory and marijuana industry professionals on a regular basis.

Company Overview

Jolly Green is a new cannabis cultivation facility that will cultivate and distribute high-quality cannabis to other retail marijuana establishments and licensed facilities.

We believe in going above and beyond to cultivate the highest quality cannabis strains. Our staff will be experts on various strains, from seed to harvest, the effects of various strains, the cultivation methods

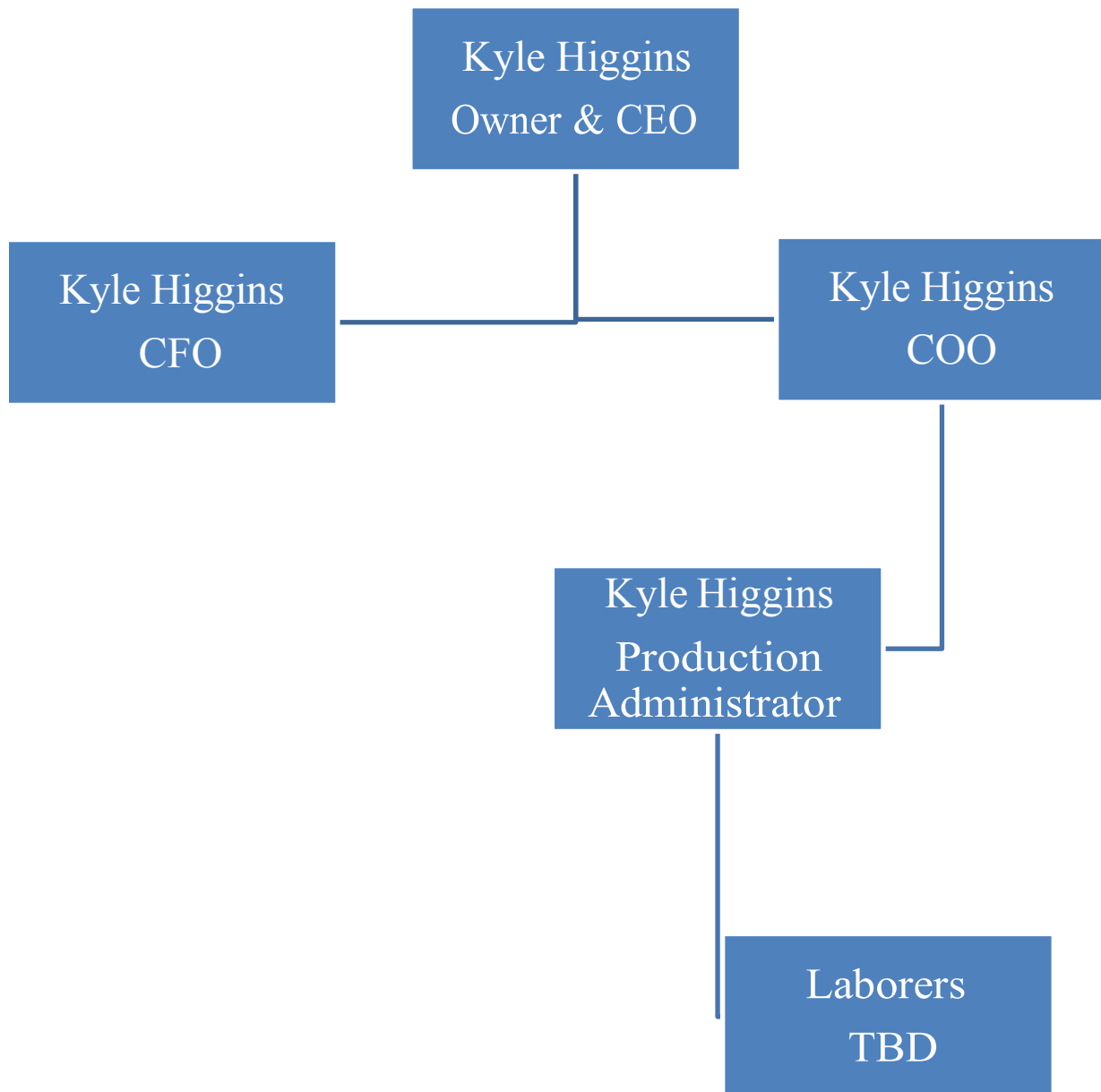
and processes we use to cultivate our cannabis. We will be knowledgeable, friendly resources to owners and agents of retail marijuana stores and processing facilities. Jolly Green is dedicated to raising the standard in product quality and leading by example in creating a higher code of ethics for businesses in the industry to follow.

1.7 COMPANY HISTORY

JG was founded in 2018 as Jolly Green by Kyle Higgins. The company was founded to serve the immediate and future needs of other resale marijuana establishments in Worcester Massachusetts. JG's founders bring their own unique experiences, education and dedication to combine small business hospitality with big business efficiency and professionalism to create a company that serves many needs and purposes.

We founded and modeled our company on the desire to help customer access safe, consistent and high-quality cannabis.

1.8 ORGANIZATIONAL CHART



1.9 MANAGEMENT TEAM

Our management team and founders bring together a unique and diverse background of education, experience and expertise.

Kyle Higgins Chief Executive Officer

Kyle has over 20 years' experience working as President & CEO of Higgins Mechanical, Inc. In his position, he did everything from staff development to fundraising. He was responsible for revenue from \$3 million to \$4 million. He has contributed to community development in many ways.

Kyle Higgins Chief of Operations & Production

Jolly Green

Kyle is an advocate of taxing and regulating the use and sale of marijuana and was one of the main financial backers of the recent, partially successful, campaign to legalize the use of marijuana in the United States.

Kyle Higgins Operations & Production Administrator

Kyle has been in charge of the day-to-day operations of Higgins mechanical for the past 18 years, including marketing, new employee development, accounting/ bookkeeping, overseeing payroll, Human Resources as well as handling all city, state, and county licensing issues.

1.10 STAFFING PLAN

We recognize that human resources are an extremely important asset. Hence, we will screen new applicants very carefully including in-person interviews, detailed nationwide and statewide criminal history screenings and reference checks. We will review each employee's performance regularly, and when possible, promote from within. Our salaries and benefit packages will be competitive with those offered by similar firms operating in our area.

With the steady and continued decline in available jobs due to outsourcing and automation, our plan is to not only supply local citizens with positions, but enable them to have successful, fulfilling and long-lasting careers while showing the community that we can take their sons and daughters and mold them into career professionals in the expanding recreational marijuana industry.

Using the founders' extensive knowledge and history of working with educational and professional organizations, the company will provide a rich environment of education that will not only benefit the employees, but also our customers and the local community as we learn and develop the future together.

1.11 LOCATIONS AND FACILITIES

1.11.1

PROPOSED ADDRESS

JG will be located at 60 Franklin St Winchendon Ma 01475 and a future location at 246 Suffolk Lane Gardner MA 01440.

Both facilities are owned by Kyle & Wendy Higgins of Lunenburg MA

Kyle & Wendy Higgins have granted Jolly Green Inc permission to operate a cultivation facility at the proposed address above.

Square Footage

60 Franklin St Winchendon MA is approximately 3000 square feet; an adequate size for a tier 1 cultivation facility. The second location of 246 Suffolk Lane Gardner MA is 13,000 square feet an adequate size for a tier 2 cultivation facility.

Facilities

The operation will utilize:

- Locked, secure, enclosed growing areas.
- Irrigation, fertilization, temperature control and water treatment devices.
- Distinct areas for the curing, packaging, storage, and disposal of cannabis.
- Business administration offices.

Alarm & Security System

Simply Safe will implement an alarm and security system that is fully compliant with state laws and regulations. We are planning to have a safe, secure venue with the following measures:

- All external doors and gates will be secured by commercial locks rated to ANSI grade 1 or similar standards.
- Will have a secure area to store all usable marijuana, harvested plants, and finished products when the business is not operating. All entries will be secured with a steel door in a steel frame or the equivalent and will use commercial locks.
- An alarm system programmed to activate upon unauthorized breach of any door, window, or other point of entry;
- Security cameras and monitors with off-site backups;
- Video surveillance cameras.

We will continuously monitor state, city and county regulations to ensure we remain compliant with all security and alarm requirements.

Proposed Hours of Operation

JG will be operational according to the following proposed hours of operation:

- Monday: 24 hours
- Tuesday: 24 hours
- Wednesday: 24 hours
- Thursday: 24 hours
- Friday: 24 hours
- Saturday: 24 hours
- Sunday: 24 hours

Products and Services

1.12 SERVICES

Jolly Green is a new company that believes combining small family business hospitality with big business efficiency that allows JW to provide a variety of cannabis strains to licensed marijuana facilities and retail stores in a clean, safe and welcoming environment.

We offer the following services:

1. Cultivation of cannabis in a clean, safe, and compliant environment.
2. Distribution of cannabis to retail marijuana establishments and licensed facilities.
3. Ensuring all cannabis that will be distributed meets regulatory requirements and has passed any and all required laboratory testing.
4. Education of qualified marijuana establishments and processing facilities owners and agents to help them better understand the various strains and their effects.
5. Serve as an informational resource about cannabis cultivation, agriculture and horticulture.
6. Be an informational portal about the marijuana industry to customers and the community.

1.13 PRODUCTS

JG will cultivate and provide a range of cannabis strains. The decision to cultivate cannabis instead of enter the other segments of the industry was made for two reasons. First, we have an abundance of cultivation, agriculture, and horticulture amongst our staff and founders, so this is an inherent advantage we currently possess. Second, the market for raw and processed marijuana will never go away, ensuring excellent

growth and constant demand for cannabis in all forms for decades to come as new products are created based on raw cannabis.

JG will offer varieties of the following excellent strains:

1.13.1 CANNABIS INDICA

Indica dominant strains are higher in Cannabidiol (CBD). Indica originally come from the countries of the world like Afghanistan, Morocco, and Tibet. The buds will be thick and dense, with flavors and aromas ranging from pungent skunk to sweet and fruity. Indica strains relax muscle and work as general analgesics, also helping with sleep.

1.13.2 CANNABIS SATIVA

Sativa dominant strains are higher in the THC cannabinoid. They originally come from Colombia, Mexico, Thailand and Southeast Asia. Flavors range from earthy to sweet and fruity. Sativa strains produce more of a euphoric high, lifting the consumer's mood and therapeutically relieving stress.

1.13.3 INDICA - SATIVA HYBRIDS

Hybrids will vary in their composition of THC, CBD and other cannabinoids, and are often referred to based upon the dominant cannabinoid ratio inherited from their lineage; indica, mostly indica, indica/sativa, mostly sativa, or pure sativa. The resulting hybrid strains will grow, mature and smoke in relationship to the Indica-sativa percentages they end up containing.

Current Products

JG will cultivate and distribute high quality cannabis to retail marijuana establishments and processing facilities.

Future Products

JG will listen to owners and agents of marijuana retail stores and processing facilities to understand what other needs are not being met. Those needs could include an expansion of different types of cannabis cultivation. All future products must and will adhere to state as well as city and county laws and regulations.

1.14 SOURCING AND FULFILLMENT

Acquisition

JG will acquire all seeds, seedlings, clones, or mature plants in accordance with the state laws and regulations.

Dispensing

We will distribute to licensed marijuana facilities and retail stores per the legal limits as described in state laws and regulations. Sales will be tracked via our robust, industry-leading, seed-to-sale inventory management and tracking system.

Oversight

An Inventory Control System will document all cannabis, cannabis seeds, seedlings, clones or mature plants received, distributed and sold, destroyed or in-process with independent testing laboratories. The amount, type, date and batch number will be documented in accordance with the state laws and regulations. As we store and distribute cannabis, each move in the supply chain will be detailed and documented in the Inventory Control System. Access to this system will be limited to authorized agents and department/government officials.

1.15 COMPETITORS

1.16 TECHNOLOGY

The agricultural team will implement current, state-of-the-art agricultural techniques for cultivating and harvesting cannabis.

Programmable Logic control systems will be used to automate the farming process.

The management team will maintain Windows and Mac capabilities including:

1. Complete email facilities on the Internet for working with customers directly through email and website delivery of information.
2. Complete desktop publishing facilities for delivery of reports, announcements, news, and information.
3. A robust point-of-sales system to process payments.

4. Inventory control is with METRC system which will be in compliance with the requirements described in state laws and regulations.

Inventory Control System

JG will implement an inventory control system with METRC to track all cannabis through its entire grow cycle and through all chains of custody. The inventory control system will also track the following:

- Each day's beginning inventory;
- Acquisitions, sales, disbursements, and disposable/disposed unusable marijuana throughout the day;
- Each day's ending inventory.

2 MARKET ANALYSIS

2.1 CURRENT MARKET ANALYSIS

There are currently no operating retail marijuana stores in Massachusetts. The number of marijuana establishments that will be licensed will depend on the state regulations and legislations.

Massachusetts is a densely populated New England state and also a popular tourist destination. Those two factors mean that the potential for the recreational marijuana market to explode is favorable. Although, the market is expected to start off slow since it is something entirely new, but once the market is in full swing, expect the retail stores to be busy with customers - and profits.

The market value of Massachusetts marijuana industry is based on the preliminary estimates made by Arcview. According to them, Massachusetts could become home to a \$1.1 billion cannabis industry by 2020.

Market Segmentation

The marijuana market in Massachusetts is comprised of the following types of establishments:

- Retail Marijuana Stores
- Marijuana Cultivation Facilities
- Marijuana Product Manufacturing Facilities
- Marijuana Testing Facilities
- Independent accessory shops
- Other interested parties

Current Market Analysis

Currently, 28 states and the District of Columbia have some form of marijuana legalization according to ProCon.org.

ArcView recently reported the national projection for legal cannabis sales is \$7.4 billion in 2016 and projected to rise to an estimated \$20.6 billion by 2020 (compound annual growth rate of 29%)

Market Size: Various Model Comparisons

Tobacco and alcohol annually generate over \$17 billion in federal tax revenue. States tax tobacco and alcohol and benefit as well. Given the current economic environment and the deficits states are facing, it is understandable why legalization is a topic of discussion. Assuming comparable taxes to tobacco of 40-50% (excise and sales tax), a \$40 billion marijuana market would yield \$16-20 billion in taxes.

According to Evaluate Pharma, the pharmaceutical industry is set to grow at 6.3% per year reaching \$1.12 trillion by 2022. The 10 largest drugs companies control over one-third of this market, five are based in the United States and five in Europe. The North American market (USA & Canada) remained the world's largest market with a 48.7% share, well ahead of Europe and Japan. Companies currently spend one-third of all sales revenue on marketing their products - roughly twice what they spend on research and development. As legalization becomes a more prominent issue lawmakers are faced with, it is clear that even if the marijuana market captures a fraction of the pharmaceutical industry market share, this would mean millions or even billions of tax dollars.

Threats and Risks

The business faces the normal risks faced by any business, the uncertainty inherent in a new business, the risks that will be common to the firms in this industry are strict regulations, most notably the City, County and States bylaws, of particular concern is the United States Government to close, fine and or cease the firms in the industry. JG will mitigate current and future regulatory risk by retaining legal counsel to

ensure the regulatory landscape is navigated meticulously and by seeking out municipalities that have historically been and will likely remain favorable for businesses like JG.

Because we are launching a new type of service, there are no guarantees of the size of the market. We believe however that, as shown in our customer needs section of this plan that there is significant demand to make this product viable. We have done significant research that confirms our belief that our offering will succeed in the marketplace.

2.2 INDUSTRY FORECAST

The state of the legal marijuana industry is continuously and rapidly changing and in the United States the legal marijuana industry is expected to grow 29% over the next year. More than ever before, it's clear that cannabis is quickly and undoubtedly becoming the next great American industry.

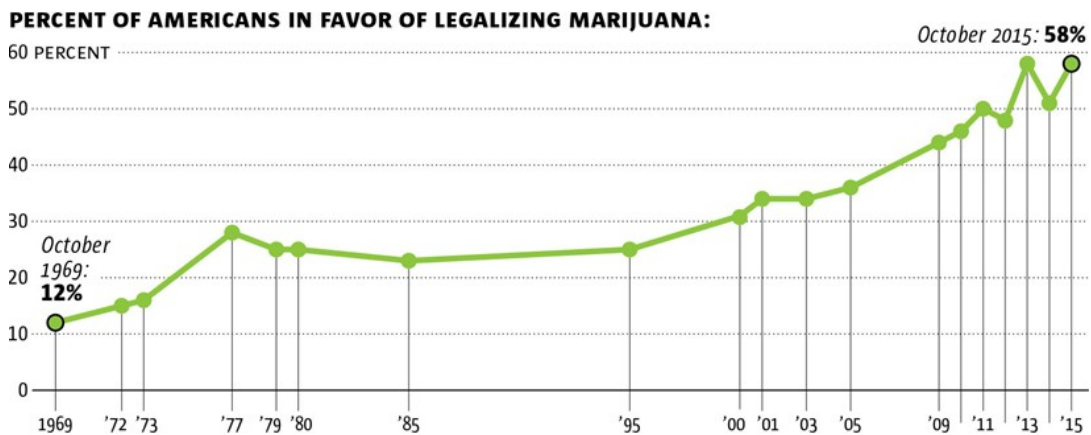
Pro Con recently reported that 28 states and the District of Columbia have legalized marijuana to some extent. The U.S. legal market value has now been projected to reach \$7.4 billion for 2016. The four-year national market potential is projected to increase by less than 300% to \$20.6 billion by 2020. (*ArcView, 4th Edition*)

The graph below depicts U.S. marijuana sales from 2015 to 2020. The data is based on the recent analyses performed by ArcView Market Research.

All of the various data and market studies available, predict significant growth and gains in the marijuana industry across the country. Current businesses are reaching profitability and many are continuing to expand. Some of the companies founded today will be among the biggest players in 2017 and beyond.

The state of the marijuana landscape is currently in flux with many states passing decriminalization laws or voting to enact marijuana laws. It is undeniable that current state policies are softening towards the recreational use of marijuana. Currently, the use of both recreational and medicinal marijuana has been entirely legalized in eight states and District of Columbia that pave the way for marijuana production, use, sale, and taxation.

America's attitude toward the decriminalization or legalization of marijuana has changed. According to Gallup, 58% now support marijuana legalization up from 36% in 2005. With each passing year, Americans are becoming more and more amenable to the reformation of public policy that would allow marijuana to be cultivated, used, sold and taxed for medical and/or recreational purposes. The recent poll below depicts the changing attitude.



Source: Gallup

The obvious public support for the reformation or creation of marijuana laws combined with state policymaker's understanding of the potential of tax revenue will continue to shape the landscape of the industry in America. As different states implement policies, it's less about whether states will legalize marijuana usage for adults but more about *when* they will legalize its usage.

Pricing

According to Arc view, so far for 2016, the nationwide average price of a pound of wholesale cannabis has fluctuated between \$1,664 to \$2,096, regardless of cultivation method used. Indoor wholesale prices have experienced a lesser degree of fluctuation with a 23% difference between low and high average prices, compared to outdoor and greenhouse wholesale prices which have each experienced 45% price differences between low and high averages. This difference between indoor and outdoor/greenhouse wholesale prices is due in most part to the limited number of outdoor harvests per year and the timing with which these cannabis crops may be harvested.

It is worth noting that indoor, greenhouse and outdoor prices all fell to their lowest levels of the year in July 2016, raising the specter that the downward pressure on prices may continue as the early fall harvest reaches the market.



Average Wholesale Price per Pound by Production Method

Market	Low Price/Lb.	Low Date	High Price/Lb.	High Date
U.S. Overall	\$1,664	July 29	\$2,096	May 27
Outdoor	\$1,233	July 29	\$1,798	May 27
Greenhouse	\$1,425	July 15	\$2,069	June 22
Indoor	\$1,955	July 22	\$2,408	Jan 22

Source: Arc view

In order to combat this price fluctuation, outdoor and greenhouse cultivators are reportedly staggering when they release crop harvests into the market throughout the year. This helps mitigate the effects of oversupply during and shortly after fall harvests, and helps cultivators take advantage of higher prices due to market undersupply during the summer.

In the long run, however, falling prices may eventually give outdoor and greenhouse cultivators a competitive cost advantage over indoor producers as they do not incur the significantly higher overhead costs associated with indoor cultivation, including from higher energy use.

Strategy and Implementation

2.3 MARKETING PLAN

2.3.1 OVERVIEW

Our marketing strategy is a simple one: we will leverage our competitive edge in order to gain significant market share. Our competitive edge is our ability to consistently cultivate high-quality cannabis with consistent levels of Cannabidiol (CBD) and Tetrahydrocannabinol (THC) percentages as well as a high ratio of overall healthy plants.

Positioning

The marketing strategy will have the objective of raising awareness and visibility by delivering consistent, high-quality cannabis.

2.3.2 PRICING

The marijuana industry, like many other agricultural industries, is based on the commodity pricing that is dictated by the economic forces of supply and demand.

Since this industry is constantly changing and marijuana is an agricultural crop, making it somewhat of a commodity, the price may fluctuate depending on different locations and markets.

There are pricing indices dedicated to gathering pricing data across different locations and markets and tracking price changes over time. The US Price Index, Kind Index, MIDS Index and Schwag Index are informal indices that rely both on published marijuana prices as well as prices submitted by end users.

According to Hightimes, below are the current indices prices per ounce:

CURRENT US PRICE INDEX: \$321

CURRENT KIND INDEX (\$350+ PER OZ): \$377

CURRENT MIDS INDEX (\$150-\$349 PER OZ): \$278

CURRENT SCHWAG INDEX (\$1-\$149 PER OZ): \$116

Below are the past month indices prices per ounce:

CURRENT US PRICE INDEX: \$330

CURRENT KIND INDEX (\$350+ PER OZ): \$374

CURRENT MIDS INDEX (\$150-\$349 PER OZ): \$281

CURRENT SCHWAG INDEX (\$1-\$149 PER OZ): \$96

Below are the year-to-date indices prices per ounce:

CURRENT US PRICE INDEX: \$312

CURRENT KIND INDEX (\$350+ PER OZ): \$373

CURRENT MIDS INDEX (\$150-\$349 PER OZ): \$269

CURRENT SCHWAG INDEX (\$1-\$149 PER OZ): \$111

In order to stay competitive, Jolly Green will price our products according to variables such as the current market prices reflected in the indices and the surrounding Massachusetts market. We will continuously strive to work with producers and processors who deliver high-quality product with efficiency and economies of scale.

2.3.3 PROMOTION

We will not advertise this business outside the guidelines established by city, county and state regulations.

Since our target market will include retail stores and other licensed marijuana facilities, our marketing focus will be on building business relationships to foster and grow business-to-business sales. We will do this by visiting the various establishments and meeting those in charge of acquisitions. We will have a simple and effective website for our prospective customers to visit and learn about our company, our cultivation methods and our products. We believe an online presence is crucial in the current marketplace.

To measure the effectiveness of our marketing efforts, our management team will draft production and sales goals, which we will review on a quarterly basis.

2.4 MILESTONES

Important milestones for achieving our goals this year:

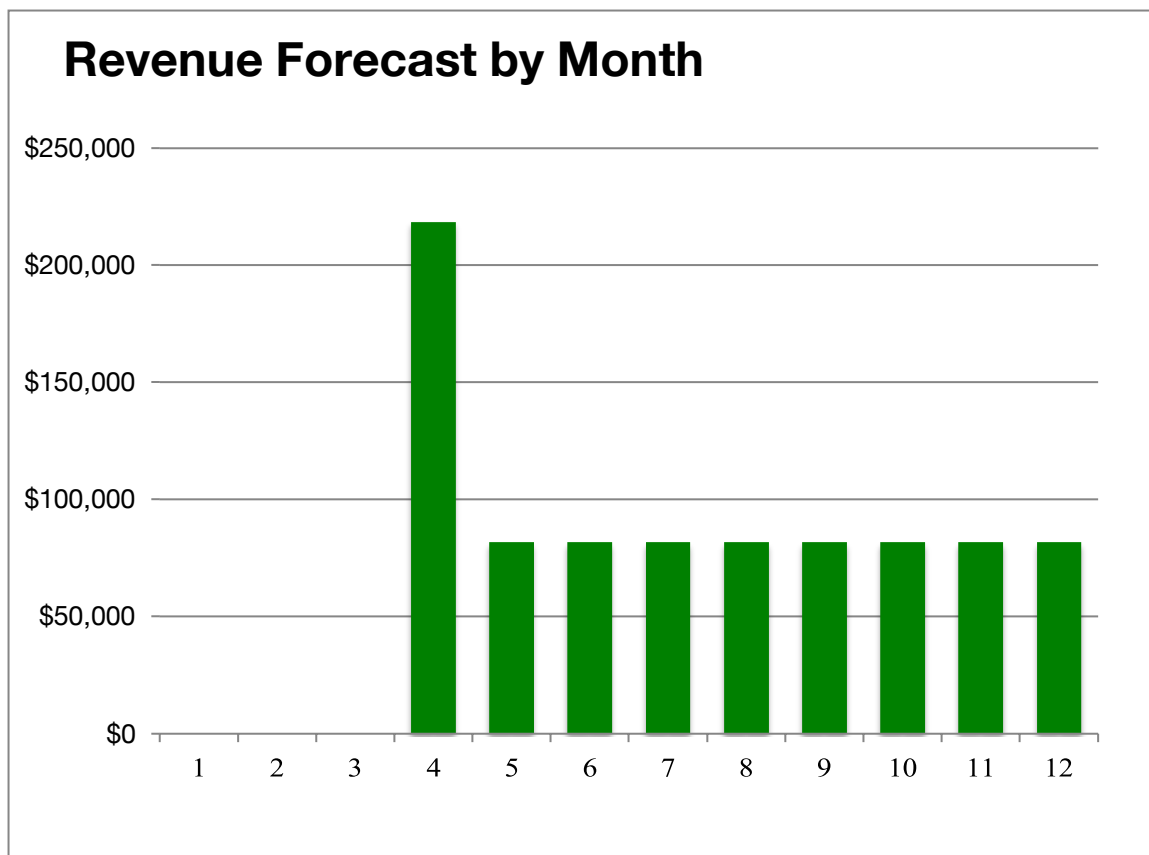
Completing Business Plan	March
Submit Business Plan, Associated Docs & Application	May
Securing a location	October
Facilities build out	December
Hire staff	March
Begin staff training	May
Complete staff training	July
Opening for business	September

3 FINANCIAL PLAN

3.1 REVENUE FORECAST

	Year 1	Year 2	Year 3
Total Revenue	\$873,632	\$1,004,677	\$1,155,378
Total Direct Cost	\$59,911	\$68,898	\$79,232
Gross Margin	\$813,721	\$935,779	\$1,076,146
Gross Margin %	93%	93%	93%

3.1.1 REVENUE FORECAST BY MONTH



3.2 PERSONNEL PLAN

3.2.1 PERSONNEL TABLE

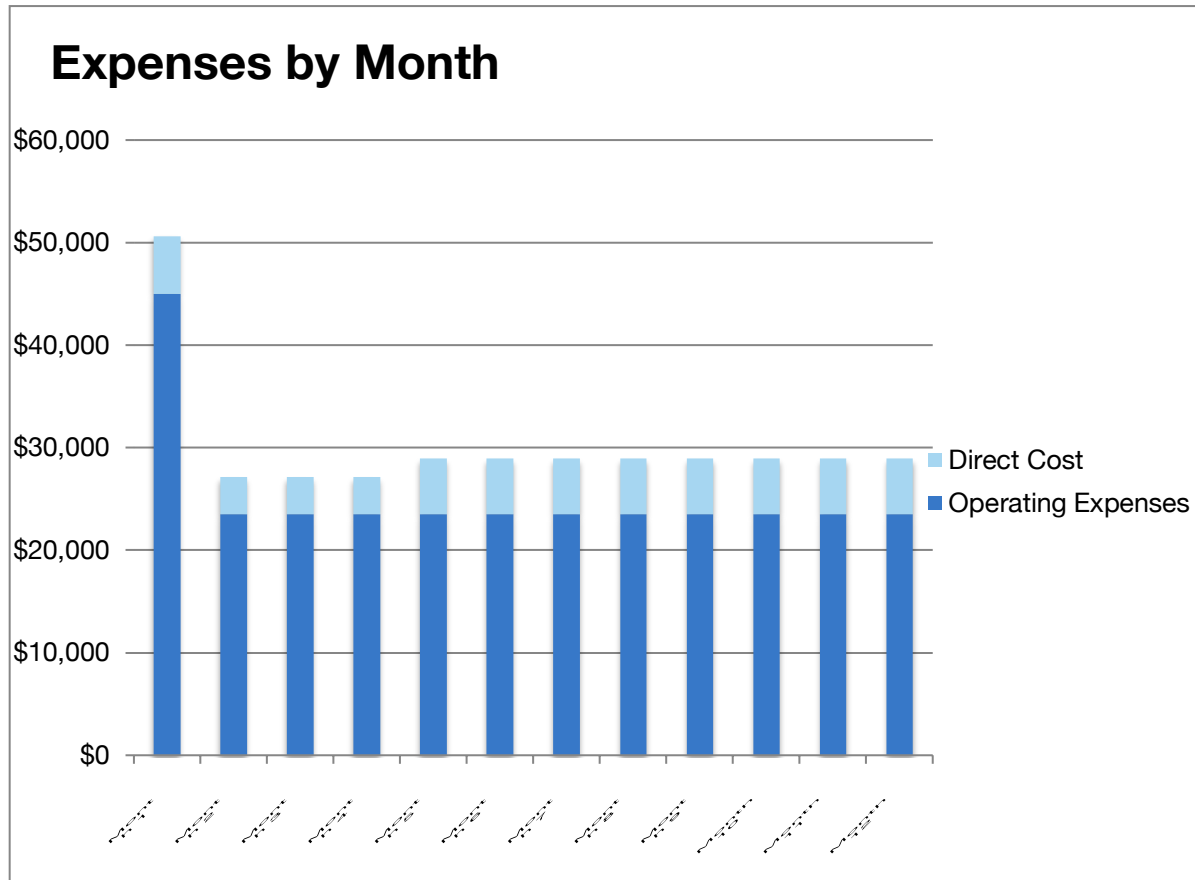
Personnel	Year 1	Year 2	Year 3
Operations & Production Administrator	\$70,000	\$72,100	\$74,263
Laborers	\$84,480	\$87,014	\$89,625
Total	\$154,480	\$159,114	\$163,888

3.3 BUDGET

3.3.1 BUDGET TABLE

	Year 1	Year 2	Year 3
Operating Expenses			
Salary	\$154,480	\$159,114	\$159,114
Employee Related Expenses	\$46,444	\$53,296	\$61,290
Marketing & Promotions	\$7,000	\$6,900	\$7,935
Rent	\$0	\$0	\$0
Office Supplies	\$1,000	\$690	\$794
Commercial Insurance	\$9,600	\$11,040	\$12,696
Maintenance & Repairs	\$3,000	\$3,450	\$3,968
Alarm & Security Monitoring System	\$52,000	\$48,300	\$55,545
Maintenance - Cleaning	\$1,200	\$1,380	\$1,587
Inventory Control Systems & Other Software Services	\$11,800	\$12,420	\$14,283
Phone & Internet	\$2,900	\$2,760	\$3,174
Professional Services (Accountant, Attorney, Consultant, etc.)	\$16,000	\$6,900	\$7,935
Annual Licensing & Dues	\$20,000	\$21,000	\$22,050
Other Expenses	\$2,000	\$0	\$0
Total	\$327,424	\$327,250	\$350,370

3.3.2 EXPENSES BY MONTH



4 FINANCIAL STATEMENTS

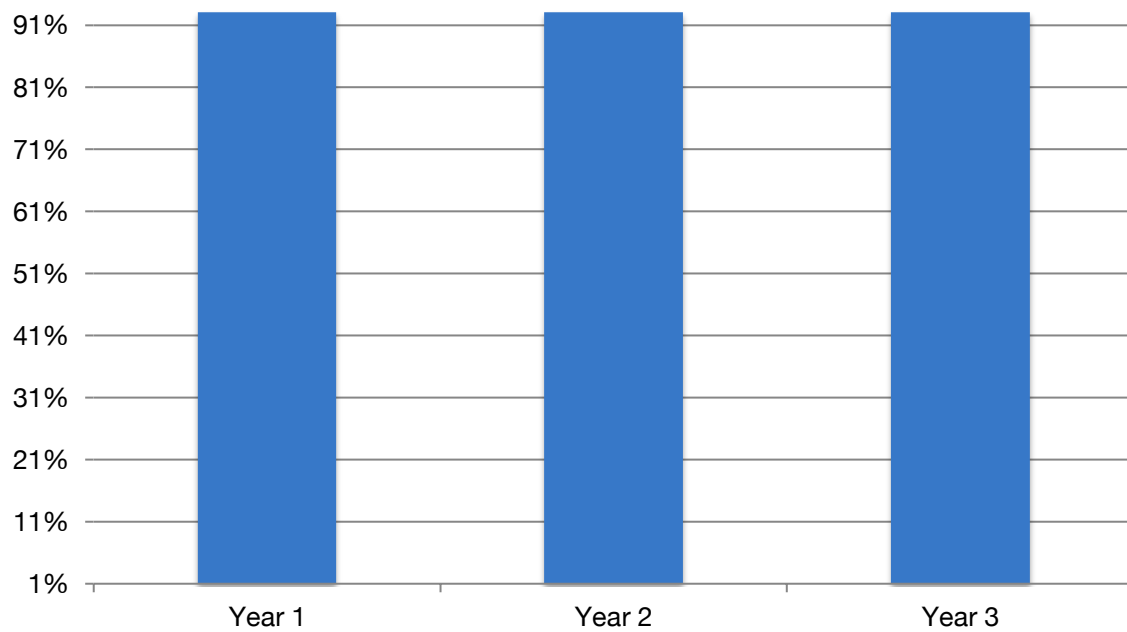
4.1 PROFIT AND LOSS STATEMENT

	Year 1	Year 2	Year 3
Revenue	\$873,632	\$1,004,677	\$1,155,378
Direct Cost	\$59,911	\$68,898	\$79,232
Gross Margin	\$813,721	\$935,779	\$1,076,146
Gross Margin %	93%	93%	93%
Operating Expenses			
Salary	\$154,480	\$159,114	\$159,114
Employee Related Expenses	\$46,444	\$53,296	\$61,290
Marketing & Promotions	\$7,000	\$6,900	\$7,935
Rent	\$0	\$0	\$0
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Alarm & Security Monitoring System	\$52,000	\$48,300	\$55,545
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Inventory Control Systems & Other Software Services	\$11,800	\$12,420	\$14,283
Phone & Internet	\$2,900	\$2,760	\$3,174
Professional Services (Accountant, Attorney, Consultant, etc.)	\$16,000	\$6,900	\$7,935

Annual Licensing & Dues	\$20,000	\$21,000	\$22,050
Other Expenses	\$2,000	\$0	\$0
Total Operating Expenses	\$327,424	\$327,250	\$350,370
Operating Income	\$486,297	\$608,529	\$725,776
Interest Incurred	\$6,190	\$4,933	\$3,618
Depreciation and Amortization	\$19,008	\$19,008	\$19,008
Income Taxes	\$210,407	\$252,488	\$302,986
Total Expenses	\$622,940	\$672,577	\$755,215
Net Profit	\$250,692	\$332,100	\$400,164
Net Profit / Sales	29%	33%	35%

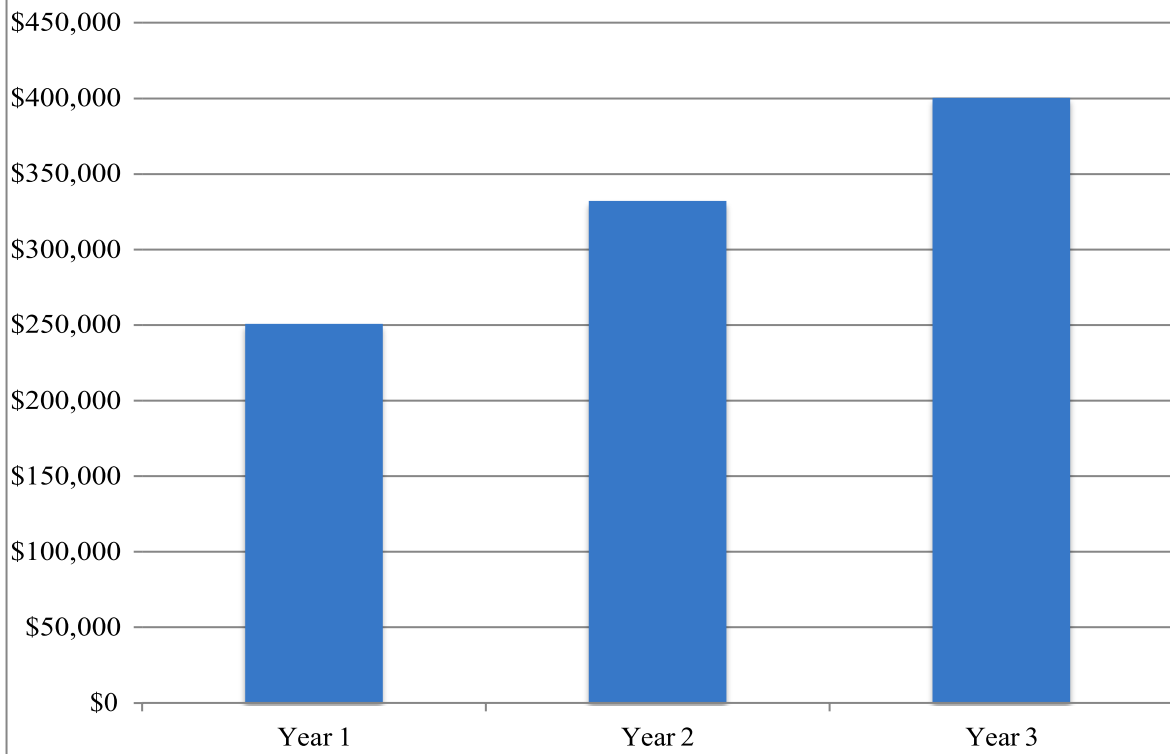
4.1.1 GROSS MARGIN BY YEAR

Gross Margin by Year



4.1.2 NET PROFIT (OR LOSS) BY YEAR

Net Profit (Loss) by Year



4.2 BALANCE SHEET

As of Period's End	Starting Balances	Year 1	Year 2	Year 3
Cash	\$32,250	\$227,977	\$544,614	\$923,457
Accounts Receivable	\$0	\$0	\$0	\$0
Inventory	\$0	\$59,911	\$71,893	\$86,272
Total Current Assets	\$32,250	\$287,888	\$616,507	\$1,009,728
Long-Term Assets	\$222,750	\$222,750	\$222,750	\$222,750
Accumulated Depreciation	\$0	\$19,008	\$38,017	\$57,025
Total Long-Term Assets	\$222,750	\$203,742	\$184,733	\$165,725
Total Assets	\$255,000	\$491,630	\$801,241	\$1,175,453
Accounts Payable	\$0	\$0	\$0	\$0
Sales Taxes Payable	\$0	\$87,363	\$96,100	\$105,709
Short-Term Debt	\$0	\$0	\$0	\$0
Total Current Liabilities	\$0	\$87,363	\$96,100	\$105,709
Long-Term Debt	\$150,000	\$122,633	\$94,008	\$64,069
Total Liabilities	\$150,000	\$209,996	\$190,108	\$169,778
Paid-In Capital	\$200,000	\$200,000	\$200,000	\$250,000
Retained Earnings	-\$95,000	\$81,634	\$411,133	\$755,675
Total Owner's Equity	\$105,000	\$281,634	\$611,133	\$1,005,675
Total Liabilities & Equity	\$255,000	\$491,630	\$801,241	\$1,175,453

4.3 CASH FLOW STATEMENT

	Year 1	Year 2	Year 3
Cash Flow from Operations			
Net Profit	\$250,692	\$332,100	\$400,164
Depreciation and Amortization	\$19,008	\$19,008	\$19,008
Change in Accounts Receivable	\$0	\$0	\$0
Change in Inventory	-\$59,911	-\$14,583	-\$20,000
Change in Accounts Payable	\$0	\$0	\$0
Change in Sales Taxes Payable	\$0	\$0	\$0
Net Cash Flow from Operations	\$233,325	\$336,525	\$399,172
Cash Flow from Investing & Financing			
Assets Purchased or Sold	\$0	\$0	\$0
Investments Received	\$0	\$0	\$0
Change in Short-Term Debt	\$87,363	\$8,736	\$9,610
Change in Long-Term Debt	-\$124,961	-\$28,625	-\$29,940
Net Cash Flow from Investing & Financing	-\$37,597	-\$19,888	-\$20,330
Cash at Beginning of Period	\$32,250	\$227,977	\$544,614
Net Change in Cash	\$195,727	\$316,637	\$378,842
Cash at End of Period	\$227,977	\$544,614	\$923,457

Jolly Green Inc
MC281283
60 Franklin St
Winchendon MA 01475

Plan for obtaining liability Insurance

Jolly Green Inc is currently holding a Marijuana Cultivator license MC281283 and is operational. Our current insurance plan would cover us at the extended location. Our insurance company is Hudson Insurance and the liability policy is HBD 100378372.

Thank you
Kyle Higgins



PO Box 650 • Barre, VT 05641
800-548-4301 • Fax 800-347-4935
Visit us at www.neee.com

Insurance Binder

Policy Number: HBD 10037837 2

New England Excess Exchange **Hudson Excess Insurance Company A XV**

Effective Date: 02/22/2021
Expiration Date: 02/22/2022
Named Insured: Jolly Green, Inc.
D/B/A:
Business Description: Indoor Growing Facilities
Named Insured Mailing Address 442 Howard Street, Lunenburg, MA, 01462

Location Address:
1. 60 Franklin Street, Winchendon, MA, 01475

BINDER SUMMARY

Minimum Earned Premium	25.00 %
General Liability Total Premium	\$ 1,000
Total Premium	\$ 1,000
Other Charges	
Surplus Lines Tax	\$ 40.00
Service Fee	Fully Earned \$ 85.00
Total:	\$ 1,125.00

Additional Information Needed for Policy Issuance:

- Mortgageholder and address, if applicable.
- Additional Insured names and addresses, if applicable.
- The TRIA Policyholder Disclosure form (HUD-IL 1001 09 12) must be signed and dated prior to binding.

ADDITIONAL NOTES:

-

General Liability**Policy Form: Occurrence Form**

Limits of Liability	Amount
Per Occurrence:	\$ 1,000,000
General Aggregate:	\$ 2,000,000
Products / Completed Ops. Aggregate:	\$ Excluded
Personal / Advertising Injury:	\$ 1,000,000
Damage to Premises Rented:	\$ 100,000
Medical Payments (any one person):	\$ 5,000
Deductible (Per Occurrence):	\$

Location # 1	60 Franklin Street, Winchendon, MA, 01475			
Classification Description	Marijuana Indoor Growing Facilities			
Class Code	73333			
	Exposure	Basis	Rate	Premium (\$)
Premises/Operations	2,500	Area	75.9000	1,000
				<small>Minimum Premium</small>
Products / Completed Operations	0	Area		Excluded

Additional Coverages**GL Total: \$ 1,000.00**

COMMON POLICY FORMS:**Form**

[IL 00 17 11 98](#)
[HUD-IL 1000 09 12](#)
[HUD-IL 1100 09 12](#)
[IL P 001 01 04](#)
[HUD-IL 1002 09 12](#)
[HUD-IL 1004 01 20](#)
[IL 00 21 09 08](#)
[HUD-IL 2001 09 12](#)

Title

Common Policy Conditions
Common Policy Declarations
Schedule of Forms and Endorsements
U.S. Treasury Departments (OFAC) Advisory Notice
Privacy Notice
Important Notice
Nuclear Energy Liability Exclusion Endorsement
Minimum Policy Premium

GENERAL LIABILITY POLICY FORMS:**Form**

[HUD-GL 1000 09 12](#)
[CG 00 01 12 07](#)
[CG 00 62 12 02](#)
[CG 21 47 12 07](#)
[HUD-GL 3001 09 17](#)
[HUD-GL 3002 09 12](#)
[CG 21 75 01 15](#)
[HUD-GL 2016 07 18](#)
[CG 21 04 11 85](#)
[CG 21 07 05 14](#)
[CG 21 36 03 05](#)
[CG 21 44 07 98](#)
[CG 21 49 09 99](#)
[CG 22 64 07 98](#)
[HUD-GL 3005 11 15](#)
[HUD-GL 3006 01 14](#)
[HUD-GL 3007 09 12](#)
[HUD-GL 3008 03 19](#)
[HUD-GL 3009 09 12](#)
[HUD-GL 3022 09 12](#)
[HUD-GL 3035 10 18](#)
[HUD-GL 3036 10 18](#)
[HUD-GL 3037 08 15](#)
[HUD-GL 3038 08 15](#)
[HUD-GL 3039 10 18](#)

[HUD-GL 3040 10 18](#)
[HUD-GL 3041 08 15](#)
[HUD-GL 3046 08 15](#)
[HUD-GL 3047 11 15](#)
[HUD-GL 3058 07 19](#)
[HUD-GL 3059 10 19](#)
[HUD-GL 3066 06 20](#)

Title

General Liability Declarations
Commercial General Liability Coverage Form
War Liability Exclusion
Employment-Related Practices Exclusion
Exclusion - Punitive Damages
Exclusion - Lead, Asbestos and Silica
Exclusion Of Terrorism
Definition -Bodily Injury
Exclusion - Products-Completed Operations Hazard
Exclusion - Personal Information and Data-Related Liability
Exclusion - New Entities
Limitation Of Coverage To Designated Premises Or Project
Total Pollution Exclusion Endorsement
Pesticide Or Herbicide Applicator Coverage
Exclusion - Animals
Exclusion - Assault & Battery
Exclusion - Communicable Disease
Exclusion - Firearms And Weapons
Exclusion - Physical Abuse Or Sexual Abuse
Classification Limitation
Exclusion - Professional Services (Medical Marijuana)
Exclusions Related to Marijuana
Exclusion - Copyright Infringement
Exclusion - Criminal Activities
Additional Conditions - Compliance with Applicable Law (Marijuana)
Exclusion - Delivery or Transportation
Exclusion - Security Guards
Exclusion - Tribal Enterprises
Exclusion - Pure Economic Loss
Exclusion - Total Aircraft, Auto or Watercraft
Exclusion - Electronic Cigarette And Vape Pens
Fungi Virus or Bacteria Exclusion

STATE SPECIFIC POLICY FORMS:**Form**

[HUD-Excess-1000-MA 10 19](#)
[SS - MA 07 12](#)

Title

Policy Jacket
Service of Suit - Massachusetts



William Francis Galvin
Secretary of the
Commonwealth

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

Date: January 22, 2021

To Whom It May Concern :

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

JOLLY GREEN, INC.

is a domestic corporation organized on **April 30, 2018** , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



In testimony of which,

I have hereunto affixed the

Great Seal of the Commonwealth

on the date first above written.

William Francis Galvin

Secretary of the Commonwealth

Certificate Number: 21010903790

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

Processed by: mas



MC281283 03/12/2021
License Number Expiration Date

Pursuant to its authority and power to license Marijuana Establishments granted to it under Chapter 94G of the Massachusetts General Laws,

The Cannabis Control Commission hereby grants a final Marijuana Establishment license to:

Jolly Green Inc

Marijuana Establishment permitted to operate at the following address

60 Franklin St
Winchendon, MA 01475

Marijuana Establishment licensed to perform the following operations:

Marijuana Cultivator



Steven J. Hoffman | Chairman


Kay Doyle | Commissioner


Britte McBride | Commissioner


Jennifer Flanagan | Commissioner


Shaleen Title | Commissioner


Shawn Collins | Executive Director

The Marijuana Establishment is subject to M.G.L. 94G, Commission regulations, Commission decisions, and all other legal requirements must remain fully compliant with said requirements and legal authorities until such time that it is approved by the Commission to cease operations.

Plan to Obtain Liability Insurance

1. Jolly Green shall obtain a general liability and product liability insurance coverage of no less than \$1 million per occurrence and \$2 million aggregate annually. The deductible for each policy can be no higher than \$5,000 per occurrence as per 935 CMR 500.101(1) and 935 CMR 500.105(10).
2. Jolly Green currently has general and product liability coverage for its 60 Franklin St Winchendon location and license. The current coverage is \$1 million per occurrence and \$2 million aggregate annually. With a deductible no higher than \$5,000. We have spoken with Hub international who is our insurance broker and confirmed that the additional location can be added to our current policy for the Suffolk Lane location. The new location would require an insurance inspection and there would be an additional cost for the coverage as well.
3. Jolly Green would conduct an annual insurance audit with the existing carrier. This includes an onsite facility inspection. All coverage would be within the limits of 935 CMR 500.101(1) and 935 CMR 500.105(10).



JOLLGRE-01

MPROULX

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

9/17/2021

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER HUB International New England 90 Parker St Gardner, MA 01440	CONTACT NAME:	
	PHONE (A/C, No, Ext): (800) 243-8134 FAX (A/C, No): (978) 630-5390	
INSURED Jolly Green Inc 60 Franklin Street Winchendon, MA 01475	E-MAIL ADDRESS:	
	INSURER(S) AFFORDING COVERAGE	NAIC #
	INSURER A: Hudson Specialty Insurance Company	37079
	INSURER B:	
	INSURER C:	
	INSURER D:	
	INSURER E:	
	INSURER F:	

COVERAGES

CERTIFICATE NUMBER:

REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WYD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input checked="" type="checkbox"/> CLAIMS-MADE <input type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: <input type="checkbox"/> POLICY <input type="checkbox"/> PROJECT <input type="checkbox"/> LOC OTHER:			HBD 10037837	2/22/2021	2/22/2022	EACH OCCURRENCE \$ 1,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 100,000 MED EXP (Any one person) \$ 5,000 PERSONAL & ADV INJURY \$ 1,000,000 GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - COMP/OP AGG \$
	AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO OWNED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS ONLY <input type="checkbox"/> NON-OWNED AUTOS ONLY						COMBINED SINGLE LIMIT (Ea accident) \$ BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$
	UMBRELLA LIAB <input type="checkbox"/> OCCUR EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE DED <input type="checkbox"/> RETENTION \$						EACH OCCURRENCE \$ AGGREGATE \$
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) <input type="checkbox"/> Y/N If yes, describe under DESCRIPTION OF OPERATIONS below		N/A				PER STATUTE <input type="checkbox"/> OTH-ER <input type="checkbox"/> E.L. EACH ACCIDENT \$ E.L. DISEASE - EA EMPLOYEE \$ E.L. DISEASE - POLICY LIMIT \$

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

CERTIFICATE HOLDER

Cannibas Control Commission

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

General Liability

Policy Form: Occurrence Form

Limits of Liability

	Amount
Per Occurrence:	\$ 1,000,000
General Aggregate:	\$ 2,000,000
Products / Completed Ops. Aggregate:	\$ Excluded
Personal / Advertising Injury:	\$ 1,000,000
Damage to Premises Rented:	\$ 100,000
Medical Payments (any one person):	\$ 5,000
Deductible (Per Occurrence):	\$

Location # 1

60 Franklin Street, Winchendon, MA, 01475

Classification Description

Marijuana Indoor Growing Facilities

Class Code

73333

	Exposure	Basis	Rate	Premium (\$)
Premises/Operations	2,500	Area	75.9000	1,000
				<small>Minimum Premium</small>
Products / Completed Operations	0	Area		Excluded

Additional Coverages

GL Total: \$ 1,000.00



PO Box 650 • Barre, VT 05641
800-548-4301 • Fax 800-347-4935
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Insurance Binder

Policy Number: HBD 10037837 2

New England Excess Exchange **Hudson Excess Insurance Company A XV**

Effective Date: 02/22/2021
Expiration Date: 02/22/2022
Named Insured: Jolly Green, Inc.
D/B/A:
Business Description: Indoor Growing Facilities
Named Insured Mailing Address 442 Howard Street, Lunenburg, MA, 01462

Location Address:
1. 60 Franklin Street, Winchendon, MA, 01475

BINDER SUMMARY

Minimum Earned Premium	25.00 %
General Liability Total Premium	\$ 1,000
Total Premium	\$ 1,000
Other Charges	
Surplus Lines Tax	\$ 40.00
Service Fee	\$ 85.00
Fully Earned	
Total:	\$ 1,125.00

Additional Information Needed for Policy Issuance:

- Mortgageholder and address, if applicable.
- Additional Insured names and addresses, if applicable.
- The TRIA Policyholder Disclosure form (HUD-IL 1001 09 12) must be signed and dated prior to binding.

ADDITIONAL NOTES:

-

Staffing and Training Plan



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Introduction

The information in this plan is designed to provide guidance for managers and supervisors related to the responsibilities of staffing and hiring. This plan is designed to support the development of human capital and staff capabilities in order to maximize the efficiency and effectiveness of the organization. It will be reviewed and updated six months after the company starts operations and annually thereafter to adapt to changes in the needs of the company or trends in the industry.

is committed to following all local, state and federal laws related to labor and employment. Jolly Green Inc will adhere to requirements as described by:

- The Wage and Hour Division of the U.S. Department of Labor
- The MA. State labor regulator of labor.

Jolly Green Inc 's employment practices are based on job qualifications, performance, and conduct without regard to race, color, religion, national origin, age, sex, marital status, height, weight, disability, genetic information, or any other legally protected status.

The Jolly Green Inc provides reasonable accommodation to qualified individuals with disabilities in accordance with the law. Any employee with a need for accommodation due to a disability will be encouraged to notify his/her supervisor as soon as possible.

It is in our best interest to hire individuals according to planned needs. The staffing portion of this plan is designed to estimate the positions that will be necessary to efficiently manage the business and specify the job descriptions and expected qualifications for each.

General Staffing Policies

Jolly Green Inc will use best practices to staff positions and retain employees. The following policies will be carried out to ensure efficient operations:

- Include managers in the hiring process for positions they will be responsible for supervising.

- Ensure that an adequate number of employees are hired and scheduled for each shift to reduce stress caused by continuous overwork.
- When appropriate, employees will be cross trained such that they may provide assistance to another department that temporarily becomes busier than normal.
- Ensure that backup support is available through a system of on-call or part-time workers in case scheduled staff cannot come in for a shift.
- Managers will maintain a combined record of additional educational qualifications and skills that employees have such that new opportunities may be filled from within the company when possible.
- Utilize a Hiring Tracker (Appendix A) to manage the status of hiring employees.
- Utilize a variety of recruiting resources, including online career websites, recruiting agencies, job fairs, placement departments at training agencies, etc.
- Utilize an Intake Checklist (Appendix B) to ensure all documentation is properly collected and activities associated with hiring an employee are completed.
- Provide an environment in which employees feel respected and appreciated for quality work.
- An Employee Handbook will be provided to all staff as part of the training process specifying expected behaviors, company policies, and a disciplinary procedure.
- Managers will be trained in best hiring practices, effective training techniques, and appropriate evaluation methods, which are further detailed in sections below.
- Staffing plan records: Jolly Green Inc shall maintain a staffing plan and staffing records in compliance with 935 CMR 500.105(9).
- Jolly Green Inc is an alcohol, smoke, and drug-free workplace.
- Jolly Green Inc will provide a plan describing how confidential information will be kept and maintained.
- Jolly Green Inc has 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.

Staffing Requirements

The following table specifies the essential staffing positions that need to be filled and anticipated associated costs related to their functions.

Primary Employee	Man-hours/Week	Function	Relative Importance of Function	Estimated Cost/Mo.*	Notes
Chief Executive Officer	N/A	Overall Business Management	Critical		
Chief Compliance Officer	40	Compliance with Regulations and Procedures	Critical		
Chief Financial Officer	40	Finances and Accounting	Support		
Security Manager	40	Security Management	Critical		
Computing Security Officer	20	Computer Security	Support		
Inventory Control Manager	40	Inventory Control Management	Critical		
Facilities Manager	40	Facility Management	Critical		
Facilities Asst Manager/Staff	40	Facility Management Support	Support		
Quality Assurance Officer	40	Quality Assurance	Support		

Record Keeping Manager	40	Record Keeping	Support		
Security Staff	196 (2 during all business hours)	Security Operations	Critical		
Inventory Control Staff	40	Inventory Control Operations	Critical		
Sales Manager	40	Sales	Critical		
Facilities Staff	40	Facility Operations	Support		
Cultivation/ Mfg. Manager	40	Cultivation/ Mfg. Operations	Critical		
Cultivation/ Mfg. Staff	168	Cultivation/ Mfg. Support	Critical		

*Estimated Cost refers to monthly salary/benefits, payroll taxes and other insurances.

Organizational Chart

Board of Directors

Chief Executive Officer

Chief Compliance Officer

Inventory Control Manager

Inventory Control Staff

Computing Security Manager

Security Manager

Security Staff

Record Keeping Manager

Quality Assurance Officer

Quality Assurance Staff

Facilities Manager
 Facilities/Janitorial Staff
Chief Financial Officer
 Sales Manager
 Sales Staff
Director of Production Cultivation
 Cultivation/Manufacturing Manager
 Cultivation/Manufacturing Staff
 IPM/Pest Control Manager
 Propagation Manager
 Trimming/Processing Manager
 Processing Staff

Organizational Chart



Job Descriptions

Chief Executive Officer

The Chief Executive Officer (CEO) is the primary representative of the company to regulators, law enforcement, and the public and provides direction and leadership in the company's mission, vision, values, and strategy. The CEO implements and manages the strategic services, goals and objectives of the organization. It is also an important role of the CEO to set an example of professionalism and respect for others in all areas of operations.

Responsibilities include, but are not limited to:

- Operate the organization according to direction provided by the Board of Directors.
- Facilitate an open communication system to support operations and administration of the Board by advising and informing its members.
- Report progress and statistical performance measures to the Board on a quarterly basis.
- Oversee all operations and business activities to ensure they produce the desired results based on goals and timelines.
- Hire qualified personnel for Executive Staff positions.
- Build and maintain a positive working relationship with Executive Staff and be open to suggestions for improvements from employees.
- Enforce adherence to legal guidelines and standard operating procedures to maintain the company's legal status and business ethics.
- Implement the Business Plan and make suggestions for its improvement.
- Set goals for performance and growth.
- Review financial and other reports to track business performance and devise methods for improvements.
- Build relations with key partners and stakeholders and act as a point of contact for investors.
- Foster a spirit of cooperation, respect and professionalism among employees and other executives.
- Analyze problematic situations and occurrences and provide solutions to ensure company success and growth.
- Maintain a deep knowledge of the cannabis markets and industry
- Stay up to date on management-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations,

participating in conferences, and/or other means of networking with and learning from other management experts.

Requirements:

- BA in business required
- 2 years of experience working in the pharmaceutical or cannabis field desired
- In-depth knowledge of corporate governance and general management best practices
- Ability to demonstrate an understanding of business functions, including finances, HR, sales, and marketing
- Strategic planning and business development experience
- Excellent communication skills
- Ability to pass a background check

Chief Compliance Officer

The Chief Compliance Officer (CCO) reports to the CEO and is responsible for implementing the Security Plan, the Inventory Control Plan, and the Record Keeping Plan by managing designees who will be responsible for a subset of tasks.

Responsibilities include, but are not limited to:

- Manage security compliance according to state guidelines and the Security Plan.
- Have a sufficient understanding of computing security to the extent that he or she is able to select a qualified individual or contractor to implement the computing security component of the Security Plan.
- Manage a budget covering compliance-related resources.
- Work with local and state government agencies on environmental issues and specific licensing requirements.
- Serve as the company's secondary expert (after the Inventory Control Manager) in the use of the Inventory Control System and ensure compliance with all related regulations.
- Monitor and interpret the regularly changing rules of state cannabis commerce and communicate with staff accordingly.
- Define the structure of a record management system, including a document retrieval system, in compliance with the Record Keeping Plan.
- Oversee the training compliance system for all employees.
- Work closely with the Quality Assurance Officer to monitor and improve the implementation of standard operating procedures.

- Oversee the maintenance of records such that requests for information from regulating authorities or law enforcement will be met by required deadlines.
- Foster a spirit of cooperation, respect and professionalism among employees and other executives.
- Stay up to date on compliance-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other compliance experts.

Requirements:

- Ability to demonstrate an extensive knowledge of state and local cannabis compliance laws
- Proficiency or willingness to rapidly undertake extensive training in the use of the state's selected inventory tracking system
- 3 years of experience in management or HR in a related industry
- Familiarity with team building and training employees on compliance issue
- Motivated self-starter and proficient at multi-tasking
- Aptitude in solving problems independently
- Strong verbal and written communications
- Sound decision-making ability
- Ability to pass a background check

Inventory Control Manager

Under the direction of the CCO, the Inventory Control Manager (ICM) will be responsible for carrying out tasks specified in the Inventory Control Plan. In consultation with the CCO and the QAO, the ICM will recommend changes and amendments to the Inventory Control Plan on an annual basis.

Responsibilities include, but are not limited to:

- Serve as the company expert on the state-required inventory control system (ICS) and be aware of updates and compliance requirements related to the system
- Act as the point of contact with the system vendor
- Train and manage at least one other employee to have a sufficient knowledge in the use of the ICS to carry out upper level functions in the absence of the ICM and the CCO
- Train incoming employees on the use of the ICS based on the requirements of his or her position

- Foster a spirit of cooperation, respect and professionalism among employees and other managers
- Maintain ICS training records and all other documentation and logs per regulations and procedures
- Keep related equipment in good working condition and secured when not in use
- Develop a method to collect inventory information in the event of loss of access to the electronic inventory system
- Carry out inventory verifications and report discrepancies
- Resolve system notifications within a specified time period
- Run reports from the ICS as requested

Requirements:

- 2-3 years of experience in a management position in a related industry
- 2 years of experience working with a computer-based inventory system
- Experience in the cannabis industry preferred
- Willingness to quickly learn regulations related to inventory control and participate in extensive training to develop an expertise in the ICS
- Ability to pass a background check

Record Keeping Manager

The Record Keeping Manager (RKM) reports to the CCO and is responsible for complying with record-related regulations and implementing tasks in the Record Keeping Plan. Records are maintained to provide operational information to company managers, advisors, and owners for decision-making purposes, and to provide information in case of insurance, criminal, or regulating authority investigations.

Responsibilities include, but are not limited to:

- Manage records within a digital, indexed record management software such that materials may be quickly retrieved in the event of a request from regulators or law enforcement officials
- Work with the CCO to improve indexing or tagging categories to apply to each document
- Scan paper records into the record management system on a daily or weekly basis
- Delete or discard digital and paper records according to the company's record retention policy

- Work with the Computing Security Manager to ensure records are stored securely, backed up, and easily accessible

Requirements:

- Must be at least 21 years of age
- Must have at least 2-3 years of administrative or record keeping experience, preferably in a legal, tax or other highly regulated industry
- Experienced in using standard computer programs and able to learn new softwares within a relatively brief time period
- Willing to rapidly become familiar with regulations and record keeping standards
- Able to pass a background check

Security Manager

Under the direction of the CCO, the Security Manager (SM) is responsible for carrying out the bulk of the responsibilities identified in the Security Plan and managing Security Officers.

Responsibilities include, but are not limited to:

- Implement and enforce safety regulations and policies.
- Ensure the protection of people, property, and assets.
- Reduce risks, respond to incidents, and limit liability in all areas of financial, physical, and personal risk.
- Act as liaison to the local Police Department (PD).
- Schedule all security services and officers.
- Manage a budget covering security resources and employees.
- Ensure all security equipment and systems are operated and maintained according to manuals, standard security practices, and the Security Plan.
- Administer the access control program, including the enrollment of personnel in the company's access control system.
- Compile reports as required by the CCO.
- Utilize all security systems to discover security breaches and identify compliance issues.
- Train personnel according to established procedures and conduct regular security meetings to discuss problems and future plans.
- Ensure the maintenance of training records and security logs.
- Manage all visitor access to the facility.
- Act as liaison to all departments on security measures, procedures, and needs.

- If the company also carries out transportation responsibilities Coordinate the security of transportation activities, including the planning of delivery routes to ensure the safety and security of the delivered goods and employees.
- Conduct security evaluations to ensure constant improvement and compliance.
- Ensure the reporting and documentation of all incidents and provide initial information for investigations to the CCO.
- Ensure that all records are forwarded properly according to the Record Keeping Plan.
- Foster a spirit of cooperation, respect and professionalism among employees and other managers.
- Stay up to date on security-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other security experts.

Requirements:

- 5-10 Years Security Management Experience
- Minimum of HS Diploma or equivalent, college degree preferred
- Board certified in security management by ASIS International as a CPP highly preferred
- Must be willing and able to work a flexible schedule based on the demands of the business
- Aptitude for solving problems independently
- Strong verbal and written communications
- Sound decision-making ability
- Ability to pass a background check

Security Staff, Unarmed

Security Staff report to the Security Manager and assist in maintaining the safety and security of the staff, products, and the facility.

Responsibilities include, but are not limited to:

- Conduct periodic inspection of premises to protect against fire, theft, vandalism, and illegal activity.
- Maintain required records and logs.
- Prevent access to any unauthorized persons within the registered premises
- Assist any staff with security access issues.
- Monitor any suspicious behavior by guests, visitors, or personnel.

- Ensure compliance with state and local regulations and company procedures.
- Prepare reports as requested by the Security Manager.

Requirements:

- At least 21 years of age
- A current security guard license or the ability to receive a license, including a background check
- Prior security, law enforcement or military experience preferred

Computing Security Manager

Under the direction of the CCO, the Computing Security Manager (CSM) will manage the security related to data and technology and will be responsible for ensuring compliance with the Computing Security portion of the Security Plan.

Responsibilities include, but are not limited to:

- Interpret and establish security technologies and create an information security framework and architecture that protects sensitive data from threats.
- Monitor computing operations and infrastructure by reviewing alerts and logs on a daily basis.
- Ensure that security tools and technology are maintained and updated.
- Ensure that security vendors are appropriately vetted, meet contractual agreements and comply with regulations and policies.
- Identify patterns in which employees are failing to comply with procedures and recommend additional training or procedure updates to the CCO.
- Foster a spirit of cooperation, respect and professionalism among employees and other managers.
- Manage a budget related to computing resources.
- Evaluate new technologies and make recommendations for their use to the CCO based on industry standards and company needs.
- Audit internal security systems and policies frequently to identify areas needing improvement.
- Develop and maintain a detailed security incident response program.
- Regularly report to the CCO on the status of computing security.
- Stay up to date on computing security-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations,

participating in conferences, and/or other means of networking with and learning from other cybersecurity experts.

Requirements:

- 6-10 years of Computing Security Management experience or a bachelor's degree in computer science, programming or a similar field from an accredited institution and 4 or more years of experience
- Ability to demonstrate an expertise and knowledge of databases, networks, hardware, firewalls and encryption
- Aptitude in solving problems independently
- Strong verbal and written communications
- Sound decision-making ability
- Ability to pass a background check

Quality Assurance Officer

The Quality Assurance Officer (QAO) reports to the CEO and will be involved in decision making related to changes to policies and processes. Guided by the Quality Assurance Plan, he or she will facilitate improvements to plans, products, and systems within the company in response to employee, customer, and regulating authority feedback.

Responsibilities include, but are not limited to:

- Work closely with the Chief Compliance Officer and other managers to monitor and improve Standard Operating Procedures.
- In departments that utilize mechanical equipment, work with managers and employees to develop step-by-step procedures and maintenance logs for the use, sanitation and inspection of each item.
- Assist managers with employee training by preparing instructional materials, hands-on exercises and evaluation tools.
- Complement training conducted by other managers by providing in-person training on issues related directly to quality control.
- Foster a spirit of cooperation, respect and professionalism among employees and other executives.
- Monitor the introduction of new systems, equipment, and products, such that potential quality issues may be identified prior to the implementation of new processes.
- Maintain an awareness of regulations related to SOPs and product quality control.

- Maintain an updated source for all current policy and procedure documents in both paper and digital format and ensure easy access to employees at all levels.
- Work with department managers to conduct job risk analyses and make training and procedure recommendations based on the results.
- Perform a periodic analysis of reports and production data to identify problematic patterns and recommend updates or changes to policies and procedures.
- Assist with regulatory inspections.
- Implement procedures related to adverse events and recalls according to the Quality Assurance Plan.
- Stay up to date on quality-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other quality assurance experts.

Requirements:

- 3 - 5 years of experience in Quality Assurance in a related field or a Bachelor's degree in Quality Assurance from an accredited institution and 1 - 2 years of experience
- Experience in employee training
- Aptitude in solving problems independently
- Strong verbal and written communications
- Ability to think critically and logically in applying systems and processes to meeting company goals
- Ability to pass a background check

Facilities Manager

The Facilities Manager (FM) reports to the CEO and is responsible for building maintenance, environmental controls, operations and safety, janitorial services, sanitation, storage and maintenance of chemicals, and non-cannabis/marijuana waste management.

Responsibilities include, but are not limited to:

- Maintain lighting, HVAC and mechanical systems in excellent working condition.
- Coordinate with the Security Manager to maintain the function and safety of the facility's hardware and infrastructure.
- Manage a budget associated with facilities functions.
- Hire, manage and train facilities staff.

- Create and implement task-specific SOPs and carry out job risk analyses with the assistance of the Quality Assurance Officer.
- Be aware of federal, state and local regulations related to cannabis/marijuana business premises requirements.
- Be familiar with local building code and permit regulations.
- Develop a maintenance and inspection schedule for all building and infrastructure systems.
- Conduct or oversee the routine maintenance and inspection of environmental and other major systems critical to the operation of the organization.
- Develop and maintain logs and checklists to simplify maintenance and inspection activities.
- Schedule and facilitate required inspections by outside organizations.
- Determine which types of work can be handled by company personnel and under what circumstances an outside contractor must be called in.
- Serve as the lead responder to critical equipment malfunctions, including the maintenance of a list of critical equipment and phone numbers to call in case of breakdowns.
- Maintain an on-site inventory of selected equipment parts to facilitate rapid repairs in the event of a malfunction.
- Work with the Security Manager to support the maintenance of security systems.
- Manage chemicals, non-cannabis/marijuana waste and other refuse.
- Train facilities employees in the proper procedures for handling and disposing of chemicals, including the [Globally Harmonized System](#) of Classification and Labeling of Chemicals (GHS) and the use of Safety Data Sheets (SDSs).
- Keep records of training for each training module related to chemicals and non-cannabis waste management for every facilities employee, including the date training occurred, type of training, the signature of the employee upon completion of training, the signature of an authorized person who can verify completion of training, and the date retraining is due
- Forward all records and logs to the Record Keeping Manager
- Become familiar with all company Standard Operating Procedures to identify areas in which the Facilities Department may support other business activities.

Requirements:

- At least 5-10 years of building/facilities management experience, including repairs to mechanical and structural components
- Experience with electrical, HVAC, lighting, plumbing, ventilation and other infrastructure component installation and adjustments
- Experience working with outside vendors and contractors

- Excellent organizational, planning and problem-solving/troubleshooting skills
- Must be able to work independently with limited supervision

Chief Financial Officer

The Chief Financial Officer (CFO) will be responsible for finances and accounting, as well as overseeing activities carried out by the Sales Manager.

Responsibilities include, but are not limited to:

- Perform the day-to-day, monthly and year-end operations of the Accounting/ Finance Department.
- Assist the CEO on all strategic and tactical matters as they relate to budget management, cost–benefit analysis, forecasting needs and the securing of new funding.
- Manage the sales operation of the company through the supervision of a Sales Manager.
- Foster a spirit of cooperation, respect and professionalism among employees and other executives.
- Create financial reports such as P&L, Balance Sheet, Cash Flow and budget performance.
- Present and interpret financial data for the Executive Staff and the Board of Directors.
- Ensure compliance with applicable standards, rules, regulations, and systems of internal control.
- Perform the processing and recording of accounts payable transactions.
- Ensure that all invoices and staff reimbursements are paid accurately and in accordance with standard practices.
- Manage the processing of cash receipts, recording of revenue and receivable.
- Ensure that revenues and receivables are correct and maintained.
- Prepare and record taxes for the company (Sales, Payroll, Local) and work with the CPA on Corporate taxes.
- Perform the processing of functional and benefits expense allocations, monthly accruals, amortization of prepaid expenses, fixed assets depreciation and recording of adjusting and reclassification journal entries, if necessary.
- Perform general accounts analysis and reconciliations, including bank statements, fixed assets, employer's benefit costs, accruals and prepaid expenses
- In cooperation with the CCO and the ICM, ensure that the Point-of-Sale System is fully integrated into the Inventory Control System and be responsible for its accuracy and maintenance.

- Stay up to date on finance-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other finance/accounting experts.

Requirements:

- At least 5 years of experience in accounting for a similar business size and a Bachelor's Degree in Business or Accounting, CPA preferred
- If less than 3 years of experience in sales, willingness to attend training related to managing sales personnel
- Expert knowledge in Quick Books
- Strong organizational skills and ability to prioritize workload in order to meet tight deadlines in a fast-paced and dynamic work environment
- Excellent communication skills, written and verbal, with the ability to clearly communicate issues to all levels of management
- Excellent analytical and problem-solving skills
- Proficient in Microsoft Office (Word, PowerPoint, Excel)
- Highly detail oriented and proficient in record keeping
- Team player and able to collaborate with others in the organization
- Ability to pass a background check

Sales Manager

The Sales Manager reports to the CFO and will serve as the lead in developing sales and marketing strategies that will result in success in a highly competitive industry. A candidate having existing contacts with established businesses will be given preference.

Responsibilities include, but are not limited to:

- Work with the executive team to develop a sales/marketing strategy and identify potential customers.
- Maintain vendor and client databases and relationships.
- Attend and exhibit at trade shows.
- Develop new business relationships in line with the company's strategy.
- Gather related sales data, conduct analyses, and refine the strategy as needed.
- Have a detailed understanding of inventory and prices.
- Guide the marketing strategy based on vendor and consumer feedback.

Requirements

- At least 21 years of age
- A minimum of 3 to 5 years of sales experience in a related industry, previous experience in the cannabis/marijuana industry preferred
- Strong background in developing business relationships
- Articulate, with effective verbal and written communication skills
- Proficiency with sales management and presentation tools
- Ability to pass a background check

Director of Production

The Director of Production reports to the CEO and is responsible for the overall management of cultivation and manufacturing activities.

Responsibilities include, but are not limited to:

- Manage the budgets, overall supply chains, and operations of the cultivation and manufacturing activities.
- Implement the Cultivation and Manufacturing Plans, primarily through the hiring and supervision of the Cultivation and Manufacturing Managers.
- Ensure product safety and work with other department heads to comply with regulations and required security, inventory control, and other procedures.
- Prepare reports on production, expenses, product quality, safety, etc.
- Analyze report results and prepare recommendations for improvements.
- Present data to the other Executive Staff and to the Board of Directors as requested
- Maintain inventory levels to ensure timely delivery of products to customers.
- Research new technologies that may improve efficiency, safety, and productivity and make recommendations to Executive Staff.
- Regularly meet with Managers and the Quality Assurance Officer to discuss potential new technological ideas, improve procedures and ensure compliance with regulations.
- Foster a spirit of cooperation, respect and professionalism among employees and other executives.
- Stay up to date on cultivation/manufacturing-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related

organizations, participating in conferences, and/or other means of networking with and learning from other experts.

Requirements

- A minimum of 3-5 years of experience in cultivation or manufacturing management and leadership experience, including agricultural, pharmaceutical, or herbal medicine industries; Bachelor's degree in a manufacturing or agricultural production field preferred
- A basic understanding of the processes involved in both cultivation and manufacturing; knowledge of the cannabis/marijuana industry preferred
- Strategic planning and business development experience
- Ability to resolve problems with and between employees in a respectful and fair manner, based on sound human resources principles
- Ability to demonstrate experience in improving production and efficiency
- Excellent communication skills, written and verbal, with the ability to clearly communicate issues to all levels of management
- Ability to quickly become familiar with all regulations and Standard Operating Procedures and monitor regulatory updates

Cultivation Manager/IPM Manager

The Cultivation Manager reports to the Director of Production and manages a team of cultivation staff members in the production of high-quality cannabis/marijuana plants and plant materials.

Responsibilities include, but are not limited to:

- Manage a team that handles all aspects of daily cultivation activities in a large-scale indoor grow facility.
- Outline specific roles and responsibilities for plant technicians and work with management to build a team.
- Create and implement task-specific SOPs and carry out job risk analyses with the assistance of the Quality Assurance Officer.
- Provide weekly updates to the Director of Production to consistently re-address grow tactics.
- Maintain indoor plant growing protocols, develop and test nutrient regimens, and strive to improve planting techniques and yields.

- Execute the pest management program including elimination of all types of mold, powdery mildew, spider mites, root aphids, fungus gnats, etc.
- Work with the Inventory Control Manager to perform all cultivation tracking with the inventory control system in compliance with rules and regulations.
- Manage plant scheduling to accurately project all growing requirements on a daily, weekly, and monthly basis to maximize high-quality yield.
- Schedule, manage and oversee cloning processes, achieving a minimum 90% success rate.
- Manage the maintenance of irrigation, climate control systems, cleaning, sanitation, hazard action plans and alert management if there are issues.
- Train employees in task-related processes and health and safety issues.
- Foster a spirit of cooperation, respect and professionalism among employees and other managers.
- Ensure that logs and other records are forwarded to the Record Keeping Manager.
- Work closely with the Quality Assurance Officer to monitor and improve the implementation of standard operating procedures.
- Maintain records such that requests for information from regulating authorities or law enforcement can be met by required deadlines.

Requirements:

- Completion of a course in Plant Pathology from an accredited institution with the equivalent of a B or better as a final grade
- A minimum of 3-5 years of experience managing a marijuana cultivation facility
- Experience developing task-specific procedures and training employees
- Mastery of all grow mediums and irrigation methods
- Experienced in cloning, transplanting, defoliation, super cropping, topping, flushing, pest management, harvesting, drying, trimming, waste disposal and inventory management
- Knowledge of large-scale commercial plant growing including crop rotation management, nutrient requirements, mediums, light requirements, and environmental controls
- Knowledge of plant diseases, pests, and nutrient deficiencies and toxicity
- Advanced knowledge of the cannabis plant and genetics
- Knowledge of industry best-practices and current on new techniques with respect to the nutrient needs of individual strains and high yield recipes
- Strong attention to detail, ability to communicate clearly
- Ability to pass a background check

Training Policies

The Executive Staff are responsible for ensuring that all training required by procedures and regulations is provided at no cost to the employee. Per 935 CMR 500.105(2) and 935 CMR 500.101(1)(C)(8)

The Quality Assurance Manager will also evaluate and identify areas where specified training is lacking, create or advise on providing the new training as needed, and assist in modifying procedures to thereafter require the new training.

The Chief Compliance Officer will designate an employee to keep track of training completion and the frequency of repeated training, as well as manage a reminder system to keep employees informed of due dates of future training.

All employees will have records of training held on site in the administrative offices and archived in the document retrieval system.

The Training Matrix in Appendix C provides a list of training topics and the related operating plan that may be consulted for further details.

Manager Training

Jolly Green Inc will provide the training to managers in the areas of hiring, training, and performing evaluations. Managers are encouraged to suggest additional training topics as needs arise.

Best Practices in Hiring

In order to ensure a hiring strategy that is consistent, in compliance with legal requirements, and that attracts and keeps high quality employees, managers will be trained in the following:

- The importance of evaluating internal and external business trends to estimate the number and types of employees needed. Internal factors include changes in work shifts, workforce demographics, and downsizing. External factors include a merger or acquisition, changes in legislation, etc.

- How to write and update job descriptions, including required qualifications, particularly noting whether the position requires skills that have already been learned or if on-the-job training is appropriate. Preparation should include asking the following the questions:
 - (a) what skills, knowledge, and abilities are required for the job;
 - (b) what are some of the characteristics of the people who succeed or fail in the job;
 - (c) what qualifications are needed for the job; and
 - (d) how does the job relate to others.
- To avoid illegal screening of applicants with disabilities, list job duties describing only what the necessary tasks are, rather than how the tasks are normally performed.
- The need to develop an interview guideline to ensure a similar process is used during all interviews for the same position. The guideline should include standardized questions given in a specific order, a relatively controlled length of time for the interview, and a standardized evaluation form to be filled out by the interviewer.
- Take into account that people may feel anxiety during a formal interview, which may misrepresent their true potential.
- Clearly communicate to potential employees the salary, work schedule, and potential future opportunities within the company to reduce misunderstandings after hiring.
- Ask appropriate questions during the interview process to match a potential employee's likes and dislikes with a position that fits their personal preferences.
- Limitations on what an interviewer may ask related to age, disabilities, etc., to be in compliance with regulations.
- If any pre-employment testing is utilized, only testing instruments may be used that are clear and understandable, have been demonstrated as valid for the skills being assessed, and are appropriate for the target population.
- References must be checked and adequately documented.
- All documentation is forwarded to the Record Keeping Manager.

Effective Training Techniques

- Provide adequate training to employees prior to their first day of work.
- Utilize a variety of instruction methods, such as writing on a board, digital presentations, viewing videos, storytelling, etc.
- Involve students interactively through the use of quizzes, small group activities, case studies, Q&A sessions, question cards, role playing, physical demonstrations, identifying problems in a scene, etc.
- Where appropriate, hands on training is preferred to other methods.
- Upon hiring new employees after the business has started operations, match experienced personnel with beginners to provide support when questions or emergencies arise.
- Each in-person training session must have a sign-in sheet that is used to document the employee's fulfillment of a training requirement. The sheet should include the name of the training module, the date training occurred, the signature of the employee upon completion of training, the signature of an authorized person who can verify completion of training, and the date retraining is due. The completed sheet is forwarded to the Chief Compliance Officer (CO) and the Record Keeping Manager.

Evaluating Employees

- Carry out regular evaluations to provide positive feedback to workers and identify areas where more training or effort on the part of the employee may be needed.
- Design the evaluation such that an employee feels more confident about doing his/her work after the meeting.
- Avoid stereotyping an employee by gender, culture, disability, etc., which can lead to a misinterpretation of an employee's responses or behavior during an evaluation.

- In addition to annual performance reviews, managers may wish to carry out more frequent “check-ins” to learn about employee concerns and suggest small modifications to processes.
- Prior to an evaluation:
 - Select a private location for the evaluation that will reduce potential interruptions.
 - Schedule an appointment with the employee, giving him/her enough time to prepare. Provide the employee with his/her job description and have the employee prepare a short self-evaluation. The employee may already be aware of shortcomings in his or her work that need to be addressed.
 - Review the employee’s file, including results of prior reviews.
 - Review any datasets that provide information on the employee’s work effort, such as sales results or productivity indicators.
 - Compile any information that has been learned from communication with supervisors or coworkers that may need to be addressed during the meeting.
 - Identify accomplishments for which the employee deserves positive recognition.
 - Prepare a list of questions to ask to help identify areas that may need improvement and to gauge the employee’s job satisfaction.
 - If an employee’s performance needs to improve, decide ahead of time if it will be a verbal or written warning. Verbal warnings should be documented in the employee’s file. If a written warning is appropriate, prepare a detailed list of expectations based on policies and procedures that will need to be met. This may be presented as a Notice of Needed Improvements (Appendix D).
- If an employee makes any negative comments or becomes emotional, view it as an opportunity to learn about a concern. Do not be critical of an employee’s emotions. The conversation should be refocused on facts rather than assumptions or feelings. The evaluator should work with the employee to identify a solution to the problem, if not during the meeting, then as soon as possible thereafter.
- Do not insult an employee. Concerns about his or her work must be presented honestly, and simply described as the need to meet specific expectations.
- Explain to the employee what the impacts are of his/her inappropriate behavior.
- Employees should be given an opportunity to improve performance before written disciplinary documentation is placed in his/her file. Find out if repeated tardiness, extensive periods of time on the phone, or other behaviors are due to difficulties that could be helped with counseling or other assistance.

- Prior to implementing a disciplinary procedure, the manager should verify the facts regarding the misconduct and confirm the company's policy on the issue.
- If the employee has been provided with a list of needed improvements, both the manager and the employee should sign and date it. A copy should be given to the employee and the original placed in the employee's file. The manager should follow up with the employee and give positive feedback if appropriate or review the disciplinary procedure and next steps that will occur.
- The Disciplinary Policy in the Employee Handbook should be written with a clear understanding of the rights of the employee, which can vary by state, and may also be subject to terms of a Labor Agreement.
- Managers are responsible for consistently following the policy and all legal requirements.
- During a meeting that involves a disciplinary action, the employee should always be given an opportunity to give his/her point of view. Give the employee up to a week to write a response. The response should be maintained as part of the employee's record. The employee may request that a manager from a different department review the evaluation documentation and response.
- Reassignment or suspensions may be appropriate in the case of behavioral issues or severe conflict in which the employee has to be removed from a situation immediately, but termination isn't called for. Reassignment refers to retraining (rehabilitative). Suspension means some condition must be met before the suspension is over or the employee is terminated (punitive).
- Decisions to suspend or terminate an employee must be reviewed and approved by a member of the executive staff, or by the Board of Directors if the employee is on the executive staff.

Appendix A: Hiring Tracker

Funded: Money has been allotted to cover salary, benefits, equipment needs, etc.

Hire Goal: Number of people needed to fill positions.

Hiring Budget: Amount allocated for time commitments, job website fees, recruiting agency fees, job fair fees, etc.

Status: Job Description Complete; Position Posted; Interviewing; Intake Process in Progress; Completed.

Assigned To: Person responsible for ensuring process is completed.

Position	Funded (Y/N)	Hire Goal	Hiring Budget	Status	Assigned To	Comments
Chief Executive Officer		1	\$			
Chief Compliance Officer		1	\$			
Security Manager		1	\$			
Security Staff		5	\$			
Computing Security Manager		1 (part-time)	\$			
Inventory Control Manager		1	\$			
Inventory Control Staff		2	\$			
Record Keeping Manager		1	\$			
Chief Financial Officer		1	\$			
Sales Manager		1	\$			

Facilities Manager		1	\$			
Facilities Staff		2	\$			
Quality Assurance Officer		1	\$			
Quality Assurance Staff		1	\$			
Director of Production		1	\$			
			\$			
			\$			
			\$			
			\$			
Totals			\$			

Appendix B: Employee Intake Form Checklist

Employee Name: _____

Position: _____ Position Code: _____

Hire Date: _____

[Add or delete documents from the table according to the needs of your business and state and local regulations.]

Document	Original in File	Dept. to Receive Copy	Date Copy Sent	Person Responsible	Date Forwarded to Record Keeper
Job Description					
Resume					
Employment Application					
Authorization to Conduct Checks					
Background Check					
Reference Check Documentation					
Offer Letter					
Insurance Acceptance Form		Insurance Co.			
Computing Security					

Agreement*					
W-4		IRS			
Direct Deposit Form		Bank			
Personal Data Form					
Form I-9		IRS			
State Income Tax Form		State Income Tax Dept.			
Key/Key Card User Agreement*					
Driving Agreement (Drivers Only)					

*Available in the Security Plan

Appendix C: Training Matrix

Referenced Operating Plan (Column 3) C = Cultivation Plan D = Dispensary/Retail E = Employee Handbook H = Health & Safety Plan I = Inventory Control Plan O = Odor Control Plan Q = Quality Assurance Plan R = Record Keeping Plan S = Security Plan ST = Staffing & Training W = Waste Management Plan OT = Other	Key to Employee Types (Columns 4-11) 1 All Employees 2 Managers 3 Security Personnel 4 Cultivation Employees 5 Manufacturing Employees 6 Packaging and Labeling Employees 7 Transportation Employees 8 Dispensary/Retail Employees
--	--

Training Topic	Brief Description	Plan	1	2	3	4	5	6	7	8
Effective Training Techniques	Instruction methods, student interaction, documentation and record keeping	ST		X						
Best Practices in Hiring	Writing job descriptions, preparing for an interview, regulations guiding interview questions	ST		X						
Evaluating Employees	Fair evaluations, preparing for a meeting, dealing with unsatisfactory performance	ST		X						
Reg-Federal Regulations	Information from the Wage and Hour Division of the U.S. Department of Labor; OSHA workplace injury documentation	OT	X							
Reg-State Regulations	[Add link to State Regulations]	OT	X							
Reg-Local Regulations	[Add link to Local Regulations]	OT	X							
Reg-Environmental Regulations	[Add link to Environmental Regulations]	OT	X							
Sensitive Records	Definition, storage requirements, access, computing security, retention policy	R, S	X							
Employee Orientation	Policies, pay, benefits, evaluations, suspension, disciplinary procedures	E	X							
Emergency Preparation	Good housekeeping, prevention, engineering controls, finding emergency numbers, practice and drills	S	X							
CPR/1st Aid (Encouraged for all)	Recognizing and responding to a variety of medical situations, when to call for help	S		X	X					
Emer-Armed Robbery	Appropriate response, silent alarm, noticing details, notifying management, contacting law enforcement	S	X							
Emer-Burglary	Avoiding affected areas, notifying management, contacting law enforcement	S	X							
Emer-Other Security Breaches	Types, risks, response procedures, notifying management, contacting emergency responders	S	X							
Emer-Medical Emergencies	Notifying person on staff with CPR/1st Aid training, notifying management, contacting emergency responders	S	X							
Emer-Fire Emergencies	Evacuation procedure, fire extinguishers, notifying management, contacting emergency responders	S	X							
Emer-Evacuation Procedure	Panic alarm, routes of egress, closing doors, safely maintaining secured areas,	S	X							

Safety Data Sheets (SDSs)	Globally Harmonized System, purpose, sections, hazard pictograms, hazard communication	H, C	X								
Container Labeling	SDSs, requirements, symbols, signal words, hazard statements	H	X								
Personal Protective Equipment (PPE)	Purpose, proper use, maintaining supplies, SDS information	H	X								
Chemical Spill Response	Incidental vs. non-incidentals spills, PPE, clean up supplies, identifying potential risk to the environment	S or H	X								
Respiratory Protection	Proper equipment and use, respiratory risks, SDSs	H				X	X				
Protecting the Environment by Monitoring Water	Regulations, testing procedures, logs and record keeping, modifying pH	W				X	X				
Ladder Safety	Types of ladders, safe use, 3 points of contact	H	X								
Heat Stress	Risks, identifying symptoms, response procedure	H				X	X				
Poison Control	Sources of poisons, response procedure, posting of Poison Center phone #	H	X								
Safe Lifting	Body positioning, when to ask for help or use equipment, PPE	H	X								
Lockout System	Taking equipment out of service, responsibilities, lockout removal procedure	H									
Fire Extinguisher Use (Encouraged for all)	Locations, PASS, safety precautions	S		X	X						
Electrical Safety (as needed)	Risks, precautionary measures, PPE, advanced equipment lockout	H									
Basic Safety Rules	Housekeeping, obeying signs, training, following procedures, etc.	H	X								
Sanitation	Frequency, process, PPE	H	X								
Logs and Record Keeping	Purpose, types, document retrieval system, retention	R	X								
Equipment	Proper use, maintenance, inspections, repairs, lockout, contamination issues, logs	C, M, P				X	X	X			
Driving Safety (+ All Company Drivers)	Awareness, space between vehicles, driving in heavy traffic and inclement weather, what to do when an accident occurs	T								X	
Product Testing		Q				X	X				

Testing Sample Preparation	Purpose, selecting samples, record keeping	Q				X	X				
Bloodborne Pathogens	Response procedure, Hepatitis B	H	X								
Storage Requirements (temp, humidity, etc.)	Environmental conditions of finished flower and associated products and materials	C		X		X	X	X	X	X	
Processing	Processing stages, environmental conditions	C				X					
Methods of Cultivation	Plant stages, seeds vs. cloning, lighting requirements	C				X					
Plant Inspection	Daily checklist, logging plant and environmental conditions, pest management	C, Q				X					
Tracking Lots and Plants	Managing seed and cutting lots, applying UIDs, cross referencing to cultivation records	C				X					
Media	Media types and watering methods	C				X					
Cultivation Equipment	Types and purpose	C				X					
Fertilizers	Procedure for administering nutrients	C				X					
Seed Propagation		C				X					
Clone Propagation	Required attire, tool preparation, procedure, monitoring	C				X					
Vegetative Growth and Flowering	Definitions, light requirements, length	C				X					
Harvesting	Process description, cautions	C				X					
Job-specific Risks and Emergencies	Specific types of accidents that may occur, use of job risk analysis, managing changes in workflow or processes, updating procedures	M	X								
Good Manufacturing Practices	Risk analysis and management, quality assurance, safety, existing guidelines	M					X	X			
Working with Solvents	SDSs, potential health hazards, evaluating exposure, engineering controls, PPE, containers and labeling, reuse	M					X				
Extraction Methods	Types of extracts, chemistry, working with heating elements, working with batches, inventory control, scales and other equipment, workflow, safety, sanitation, storage	M					X				

Mixing	Working with batches, inventory control, ingredients, scales and mixing equipment, safety, sanitation, storage	M					X			
Infusion Methods	Working with heating elements, working with batches, inventory control, ingredients, scales and infusion equipment, safety, sanitation, storage	M					X			
In-process Sampling and Controls	Selecting a sample, preparing a sample, homogenization, workflow, inventory control, procedures for failed samples, record keeping	M					X			
Food/Ingredient Safety and Storage	Perishables, variations in shelf life, effects of heat, light, and oxygen	M					X	X		
Reuse of Materials	Working with batches, inventory control	M					X			
Equipment Inspection	Risks of working with equipment, maintenance procedures, maintenance and repair logs, sanitation, record keeping	CMP				X	X	X		
Contamination Control	Routes of contamination, sanitation, PPE and other engineering controls,	CMPD				X	X	X		X
Expirations/Time Limits	Effects of heat, light, and oxygen, determining expiration dates, managing expired products, inventory control	Q		X		X	X	X		X
Batch Management	Understanding batches, when/if batches can be mixed, inventory control issues, logs and record keeping	I				X	X			
UID Issuance and Control	Procuring and secure storage of UID tags	I		X		X	X	X		
Label Design	Avoiding appealing to children, label requirements, proofing	P						X		
Packaging and Labeling Procedures	Ensuring accurate and complete label information in accordance with state law	Q						X		
Quality Control	Responsibilities, sampling and testing, adverse events and recalls, changes to procedures	Q	X							
Interacting with Regulators		S		X	X					
Interacting with Law Enforcement		S		X	X					
Point of Sale System	Software, security, integration into inventory control system, scales	D								X
Returns, Complaints, Adverse Events, and Recalls	Who to notify, response procedures, logs and record keeping	Q		X						X
Sales Techniques	Interacting with and educating customers	D								X

Managing Patient Data (if applicable)	Patient privacy, HIPAA regulations, record storage, retention, limiting access	D								X
Waste Management	Regulations, collection and storage, inventory control, disposal	W	X							
Product Side Effects/Consumer Safety	Intoxicating effects, risks, laws	D								X
Product Dosage, Strengths, and Metabolism	Differences in product types, CBD vs. THC	D or M								X
Drug Interactions	Contraindications, health conditions not compatible with cannabinoid use	D								X
Methods of Ingestion	Types of products, pros and cons	D								X
Strain Characteristics and Effects		C								X
Recognizing Acute Intoxication	Signs of distress, refusing to sell to a customer, when to notify a manager	D								X
Results of Studies in Cannabis Use	Periodic updates based on literature reviews	D								X
Paraphernalia Use	Proper use of equipment, maintenance, pros and cons	D								X
Reducing Impacts on the Community		H	X							
Legal Possession Quantities and Associated Laws		D								X
Accessing Procedures	Where to find most recent versions of procedures	Q	X							
Ensuring Integrity of Shipments	Inventory control, environmental controls, sealing cases and containers	T							X	
Shipment Manifests	Requirements, responsibilities, producing a manifest, confirming manifest accuracy	T							X	
Transportation Route Selection	Route considerations, safety, traffic, obeying laws, procedure for deviating from planned route	T							X	
Transportation Procedures	Staffing requirements, responsibilities, vehicle requirements, security, delivery at customer facility, reporting problems	T							X	
Cleaning and Maintaining Display Areas		D								X
Management of Accidentally Opened Product Packaging		W				X	X	X	X	X
Packaging of Sold Products		D								X
Preventing Access to Children		D						X		X

Odor Control	Definitions, mitigation, procedures, physical measures and equipment, system maintenance	O					X	X				
Workplace Violence Policy	Expectations, reporting new or potential incidents, disciplinary action	S	X									

Appendix D: Notice of Needed Improvements

Employee Information

Name: _____

Date: _____

Employee ID: _____

Position: _____

Manager: _____

Warning Status

____ First Warning

____ Second Warning

____ Final Warning

Area of Needed Improvement

____ Lateness/Leaving Early

____ Low Productivity

____ Skipped Shift

____ Procedure Violation

____ Inappropriate Behavior

____ Other: _____

Description of Issue, including date and time of a specific incident if applicable:

Needed Improvements:

Acknowledgements

By signing this form, I verify that I understand of the types of improvements needed as specified above. I also understand that making these improvements is necessary to avoid possible disciplinary action. If I do not agree with the information documented in this form, I may write a reply and have it placed in my file attached to this form and have the information reviewed by a second evaluator.

Employee Signature: _____ Date: _____

Evaluator Signature: _____ Date: _____

Witness if employee does not sign: _____ Date: _____

Appendix E: Personal Vehicle Driving Agreement

Employees may be requested to operate their owned, leased, or rented vehicle to conduct Jolly Green Inc business.

Jolly Green Inc does not assume any liability for bodily injuries or property damage the vehicle owner, driver, or passengers may become personally obligated to pay arising out of such operation. When operating your personal vehicle on behalf of [Company], the following policies must be followed:

- The driver must be determined to meet all Jolly Green Inc driver qualification standards described in this agreement before being permitted to operate a personal vehicle on Jolly Green Inc business. Failure to continue to meet these qualification standards will result in revocation of the Employee's driving responsibilities.
- The vehicle being operated must have a valid registration, and proof of registration must be kept in the vehicle. Employee drivers must possess a current and valid driver's license on their person at all times while operating the vehicle.
- Automobile insurance meeting the legal minimum requirements of the vehicle's state of registry must be maintained on the vehicle being used, and a valid insurance identification card must be kept in the vehicle. Proof of such insurance must be provided to Jolly Green Inc when the driver is initially added to Jolly Green Inc's driver list and whenever requested thereafter.

- Jolly Green Inc does not specify and assumes no responsibility for any other coverage Employees carry on the vehicles used, but encourages those operating vehicles on behalf of Jolly Green Inc on a regular basis to maintain limits of at least \$100,000 each person/\$200,000 each occurrence for bodily injury and \$100,000 property damage, or a combined single liability (CSL) limit of \$300,000, plus uninsured motorist (UM) and underinsured motorist (UIM) coverage.
- Vehicles should be maintained so as to permit reliable and safe operation. The vehicle owner/driver is responsible for all maintenance and associated costs.
- Seatbelts and other required safety restraints must be used at all times.
- All traffic laws must be obeyed. Jolly Green Inc is not responsible for and will not reimburse Employees for any moving or non-moving violations received as a result of operating a vehicle on behalf of the organization.
- Vehicles may not be operated while the driver is under the influence of alcohol or any other controlled substance, including any prescription or over-the-counter medications that may affect driving ability.

Reporting Requirements

In order to ensure that drivers maintain compliance with the company driver qualification standard, drivers are required to report all moving violations and at-fault accidents, or drivers' license status changes (suspension, revocation, new license, etc.) to a supervisor within 72 hours of conviction, determination, or status change effective date.

Accidents Involving Use of Personal Vehicles

If you are involved in an accident in your personal or rented vehicle while traveling on business, a claim should be filed with your personal automobile insurance company, as that policy will provide primary coverage. However, the accident should still be reported to your supervisor.

Violations of Policy

Failure to comply with any of these policies may result in suspension of driving responsibilities on behalf of Jolly Green Inc.

I have reviewed and received a copy of this Jolly Green Inc Vehicle and Driving Agreement. I agree to abide by all policies and procedures to ensure safety of myself and the general public, when driving to conduct business on behalf of Jolly Green Inc.

(Print your first and last name)

Signature

Date

Record Keeping Plan



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Introduction

This Record Keeping Plan describes the policies, procedures, controls, and other measures that will be implemented to ensure a paper and electronic records are properly managed to comply with local and state requirements.

Company records will also be maintained to provide operational information to company managers, advisors, and owners for decision-making purposes, and to provide information in case of insurance, criminal, or regulating authority investigations.

A primary goal is to maintain information that will meet not only regulatory requirements, but also be transparent and admissible in court. State and local laws supersede any item in the Plan that does not meet regulatory requirements.

Within this plan [cannabis/marijuana] is often referred to as “the product.” Where an “employee” is referred to in this plan, it also includes other individuals involved with Jolly Green Inc, including owners, officers, agents, and others representing the company.

Sensitive records include, but are not limited to, personal identity information, protected health information, credit card data, financial records, intellectual property, password records, information related to a criminal investigation, material covered by any non-disclosure agreements, information identified by regulating authorities as restricted, security and operating records for which the availability would make the company vulnerable to criminal activity, and other information for which the degree of adverse effect that may result from unauthorized access or disclosure is high.

Several record keeping policies overlap with other procedures. Some items are repeated in both the Record Keeping Plan and the other plans, and in other cases, this plan refers to the other documents.

General Record Keeping Policies

Regulatory Compliance

All records associated with business conducted by Jolly Green Inc will be made available to local and state regulatory authorities upon request or on a regular basis as specified by regulations. Records will be stored in a manner that will make them easily accessible in order to comply with immediate requests for information by local and state authorities.

Records specified for retention under state regulations will be retained for seven years. Records not covered by regulatory standards will be retained for no less than three years.

Should Jolly Green Inc cease operations, the owners/board members will come to an agreement with local and state regulating authorities for the retention of and accessibility to required records for a specified period of time.

Anyone who knowingly alters, destroys, mutilates, conceals, covers up, falsifies, or makes a false entry in any electronic or paper record will face immediate termination and potential criminal prosecution.

Any employee who becomes aware of another's intent or action related to knowingly altering company records must report the information to a security officer or a senior manager.

Record keeping procedures 935 CRM 500

- Maintenance of waste disposal records. When marijuana products or waste is disposed or handled, Jolly Green Inc will create and maintain a written or electronic record of the date, the type and quantity disposed or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two Marijuana Establishment Agents present during the disposal or other handling, with their signatures. Marijuana Establishments shall keep these records for at least three years. This period shall automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.
- Record keeping – Jolly Green Inc will keep records make them available to the Commission, upon request. The records of a Marijuana Establishment shall be maintained in accordance with generally accepted accounting principles. Written records

that are required and are subject to inspection include, but are not necessarily limited to, all records required in any section of 935 CMR 500

- Jolly Green Inc will maintain a copy of our written operating procedures. It will contain a set of detailed written operating procedures as required by 935 CMR 500.105(1)
- Jolly Green Inc will maintain written Seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105 (9) C
- Jolly Green Inc will maintain the following written personnel records:

Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions. A personnel record for each marijuana establishment agent. Jolly Green Inc will maintain records 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. Jolly Green will maintain records of employee responsibilities, qualifications, and supervision.
 2. 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
 3. 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.
- documentation of periodic performance evaluations; a record of any disciplinary action taken.

Business record requirements: Jolly Green Inc will maintain the following records.

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

Waste disposal records:

Jolly Green Inc will maintain written waste disposal records per 935 CMR 500 (9) (F).

Paper and Electronic Records

Jolly Green Inc will use a record management software to scan and index/tag paper files and store electronic files to ensure rapid and accurate access to records.

Paper records will be scanned into electronic format for backup purposes on a periodic basis, no less than once per month. Once the electronic version of the paper record has been backed up, the paper version may be shredded (if sensitive) or discarded.

Paper records to be maintained for longer than one month will be filed within two months according to a system designated by the officer responsible for records management, in cabinets or boxes that are clearly labeled, and in a secured location.

Electronic records scheduled for destruction will be managed according to Guidelines for Media Sanitation, NIST Special Publication 800-88, Revision 1.

Electronic file organization will follow recommendations from the National Institute of Standards and Technology.

A records backup and archiving policy will be developed by senior managers using tools for the management of electronic records recommended by the National Archives.

Sensitive business files will be maintained in a separately secured server location from files used on a daily basis by regular employees. Employees will only have access to records needed to carry out their responsibilities.

Backup copies of sensitive archived material will be encrypted or password protected and stored in a secured cloud environment, or, if on removable media, off-site in a vault or safe where it is easy to access and easily reproducible.

All archived records to be kept for more than seven years will be converted into a format that is standardized such that changes in software and technology will not prevent access to the records.

The integrity and authenticity of stored data will be maintained to the level that they could be accepted as evidence in a court of law. Jolly Green Inc will develop a protocol for conducting business on paper in the event of an outage of any electronic system, including the transference of the paper data to the electronic system once the problem is corrected. All employees will be trained on the procedures.

Privacy

A minimum amount of information will be collected during financial transactions with customers to reduce the likelihood that personal information can be stolen.

Only personal information on employees that is required by law will be collected and stored. Employee records, particularly those related to work authorization, potential disciplinary investigations, or background checks will be kept confidential and stored in a secure location.

Any medical information collected on employees or customers will be stored separately and under an extra level of security. These records will be kept in accordance with the Americans with Disabilities Act (ADA), the Genetic Information Nondiscrimination Act (GINA), and/or the Health Insurance Portability and Accountability Act (HIPAA), as applicable.

Employee Involvement

Staff will be asked to review record keeping procedures related to their specific tasks at least once per year and give recommendations for improvements.

Roles and Responsibilities

Chief Compliance Officer

1. The Chief Compliance Officer (CCO) will be responsible for ensuring that this Record Keeping Plan is properly implemented, including dissemination of this plan and the training of employees as to its application. The CCO may designate a Record Keeping Manager to implement certain tasks outlined in this Plan.
2. The CCO will define the structure of a record management system, including a document retrieval system, and maintain training for him/herself and others in the various components of the system.

3. The CCO will develop/maintain an indexing/tagging system which can be utilized to efficiently categorize and retrieve needed data from the document retrieval system.
4. An instruction manual will be written by the CCO describing how to retrieve records from the system. Senior managers will be trained in pulling data from the document retrieval system to ensure that records and datasets can be retrieved immediately upon request from regulating authorities or law enforcement.
5. The CCO is responsible for ensuring the upload of or otherwise providing data from the inventory control or track-and-trace system to the regulating authority in the manner and on the schedule specified by regulations.
6. The CCO will regularly report to the Chief Executive Officer on the status and efficacy of the Record Keeping Plan. The CCO will review the Plan annually and recommend changes or amendments to the Chief Executive Officer to improve procedures or processes.
7. The CCO shall stay up to date on records-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other record keeping experts.

The CCO will coordinate with the officers and managers listed below to ensure that records collected across all departments will be processed according to the Plan.

- Chief Financial Officer
- Security Manager
- Quality Assurance Officer
- Inventory Control Manager
- Computing Security Manager
- Cultivation Manager
- Transportation Manager
- Manufacturing Manager
- Processing Manager

Record Keeping Manager

1. Receiving and organizing documents from all departments
2. Indexing documents in the document retrieval system
3. Recommend changes to the CCO related to the indexing/tagging system

Record Types

Business Records

- Deeds, titles, rental agreements, property records
- Most recent versions of operating plans
- Tax records required by federal, state, and local authorities, including records of late payment penalties and unpaid tax obligations
- Insurance documents
- Permits and licenses
- All correspondence with regulatory authorities
- Up-to-date local and state regulations related to the cannabis license, waste management, environmental compliance, hazardous materials, etc.
- Business documents filed with the Secretary of State
- Business property inventories and related records
- Employee forms, including IRS forms, background check results, documentation of proof of authorization to work, reference verifications, evaluations, and records of investigations and disciplinary actions. Each employee's personal information will only be collected as required by law to reduce potential incidents of identity theft
- OSHA requirements and documentation related to workplace injury, OSHA Form 300, or Form 301 if injuries have occurred
- Property diagrams
- Collective or Cooperative Membership Agreement (if applicable)
- Records relating to physical modification of or upgrades to the premises
- Manufacturer's records related to any generators to be used on the premises and permits or other compliance documentation from air quality regulators
- Labor agreement.
- Staffing plans, organizational charts, and job descriptions.

- Accounting records including, but not limited to, bank statements; monthly, quarterly and annual financial reports; ledgers and journals; vouchers; and all supporting documentation.
- Complete sales receipts/invoices containing all data required by regulating authorities.
- Purchasing receipts/invoices.
- Utility records, including documentation from electrical utility indicating greenhouse gas emission intensity per kilowatt hour (if available).
- Payroll records.
- Records of stipends, bonuses, and non-monetary compensation to individuals or companies, including benefits. The records will include an estimated dollar value for non-monetary compensation.
- Records documenting community involvement.
- Updated emergency contact lists.
- Training records, including type of training offered, date taken, and names of trained employees.
- Meeting minutes and memos.

Security Records

- Training records, including type of training offered, date taken, and names of trained employees.
- Police reports resulting from any crime-related event on the property.
- Contracts with outside security providers.
- Security equipment manuals and maintenance and inspection logs.
- Surveillance video: See the Security Plan for details.
- Completed closing procedure checklists.
- Updated lists of employee access levels.
- Security access logs (See Security Plan, Appendix A).
- Signed Key/Key Card User Agreements (See Security Plan, Appendix B).
- Weekly electronic records showing the date, time, and name of personnel accessing secured areas.
- Completed exiting employee checklists.
- Completed visitor logs (See Security Plan, Appendix C).
- Product delivery logs maintained by security personnel (See Security Plan, Appendix D).
- Records of non-conformance to procedures and reason for variance or steps taken to correct problem.
- Incident reports related to emergencies, chemical spills, accidents, external threats, workplace violence, harassment and other unexpected events.

Inventory Control Records

- All information created within the inventory control/track-and-trace system selected by the regulating authority.
- All UIDs assigned to products in inventory and all unassigned UIDs. UIDs associated with product that has been retired from the track-and-trace system will be retained for six (6) months after the date the tags are retired.
- All attributes associated with each product UID, including name, type, batch, strain, weight/count, source (if transferred in from another licensee), and transaction dates and times. Additional details required by the regulating authority will also be collected and maintained.
- Updated lists of employees with access to the inventory system.
- Training records, including type of training offered, date taken, and names of trained employees.
- Logs of errors found within the inventory system and notes on steps taken to correct errors.
- All inventory results, including the date, time, and names, signatures, and titles of inventory takers.
- Records regarding missing inventory and documentation of follow-up actions.
- Records of inventory discrepancies reported to law enforcement and/or regulating authorities.
- Documentation regarding notifications from the inventory system that cannot be resolved within the specified timeframe.

In addition to records required by regulations, electronic sortable reports related to the following will be producible for management purposes.

Location of all products on the premises by room/cabinet/storage location, including UID, description, date and time transferred to location, weight or count, name or ID of employee. Reports of products removed from a storage location, including date and time, UID, description, name or ID of employee, weight or count, and destination.

Reports of transferred products by UID that can be compared electronically pre and post-transfer to identify discrepancies in inventory, and reports of the resulting comparisons. Reports showing trends in sales patterns, demographics, product quality, or other attributes. Additional reports requested by senior managers or regulating authorities.

Computing Security Records

- Signed Network and Computing Resources User Agreements (See Security Plan, Appendix E).
- Software contracts/licensing documentation.
- Electronic record retention policies.
- Documentation of unauthorized attempts to access the computer network.
- Records of device, software, operating systems, and network security updates.
- Results of security audits.
- Certifications of electronic records destruction or disposal.
- Other records selected by the Computing Security Manager for backup to the records management system.

Cultivation Records

In addition to the records specified in the Business, Security, Inventory Control, and Computing Security Records sections above, [Company] will retain the following records related specifically to cultivation activities:

- Training records, including type of training offered, date taken, and names of trained employees.
- Scale calibration logs.
- Chemical Safety Data Sheets.
- Records relating to the disposal of product waste, including product UID, description, date of disposal, weight or count of product, reason for disposal, and method of disposal.
- Records relating to the disposal of hazardous waste.
- Environmental compliance documentation.
- Documentation of the previous use of land (if applicable).
- Water supply records.
- Records relating to weighing devices.
- Equipment manuals and maintenance and inspection logs, including chemicals used for cleaning.
- Record of internally-identified biological, chemical, physical or other contamination hazards and steps taken to resolve issues.

- Sampling and testing specifications and results and other quality assurance documentation.
- Janitorial logs relating to sanitation of facilities.
- Maintenance logs, including inspection and repair, relating to lighting, irrigation and ventilation systems, pest control systems, water and effluent discharge systems, etc.
- Record of product complaints and steps taken to resolve issues.
- Adverse event records (related to a negative effect of a product on a user).
- Records relating to product rejections or recalls, including a recall plan.
- Records of non-conformance to procedures and reason for variance or steps taken to correct problem.
- Documentation of data utilized for setting prices and rationale for the selected price.
- See the Cultivation and Chemical Safety Plans for additional record types related to planting, pruning, propagation, harvesting, and fertilizer and pesticide use.

Transportation Records

- In addition to the records specified in the Business, Security, Inventory Control, and Computing Security Records sections above, Jolly Green Inc will retain the following records related specifically to transportation activities:
- Transportation manifests showing all information required by regulating authorities.
- Records showing trip plans and the start and end times of each trip.
- Documentation of approved changes to trip plans.
- Transportation Event Logs of variances between expected and actual trip activities.
- Records of vehicle accidents.
- Records and police reports related to product losses occurring during transportation activities.

Manufacturing Records

In addition to the records specified in the Business, Security, Inventory Control, and Computing Security Records sections above, [Company] will retain the following records related specifically to manufacturing activities:

- Training records, including type of training offered, date taken, and names of trained employees.
- Chemical Safety Data Sheets.
- Records relating to the disposal of product waste, including product UID, description, date of disposal, weight or count of product, reason for disposal, and method of disposal.
- Records relating to the disposal of hazardous waste.
- Environmental compliance documentation.
- Records relating to weighing devices.
- Equipment manuals and maintenance and inspection logs, including chemicals used for cleaning.
- Product specifications.
- Sampling and testing specifications and results and other quality assurance documentation.
- Record of identified biological, chemical, physical or other contamination hazards and steps taken to resolve issues.
- Record of product complaints and steps taken to resolve issues.
- Adverse event records (related to a negative effect of a product on a user).
- Records relating to product rejections or recalls, including a recall plan.
- Records of non-conformance to procedures and reason for variance or steps taken to correct problem.
- Janitorial logs relating to sanitation of facilities.
- Documentation of data utilized for setting prices and rationale for the selected price.

Packaging and Labeling Records

In addition to the records specified in the Business, Security, Inventory Control, and Computing Security Records sections above, [Company] will retain the following records related specifically to packaging and labeling activities: Training records, including type of training offered, date taken, and names of trained employees.

Dispensary Records

In addition to the records specified in the Business, Security, Inventory Control, and Computing Security Records sections above, [Company] will retain the following records related specifically to dispensary activities:

- Training records, including type of training offered, date taken, and names of trained employees.
- Records required relating to the sale of products to medical patients (if applicable).
- Documentation of data utilized for setting prices and rationale for the selected price.
- Records of non-conformance to procedures and reason for variance or steps taken to correct problem.

Other Records

- Records relating to the disposal of product waste, including product UID, description, date of disposal, weight or count of product, reason for disposal, and method of disposal.
- Records relating to weighing devices.
- Equipment manuals and maintenance and inspection logs, including chemicals used for cleaning.
- Record of identified biological, chemical, physical or other contamination hazards and steps taken to resolve issues.
- Records of non-conformance to procedures and reason for variance or steps taken to correct problem.
- Janitorial logs relating to sanitation of facilities.

Record Keeping Plan



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Introduction

This Record Keeping Plan describes the policies, procedures, controls, and other measures that will be implemented to ensure a paper and electronic records are properly managed to comply with local and state requirements.

Company records will also be maintained to provide operational information to company managers, advisors, and owners for decision-making purposes, and to provide information in case of insurance, criminal, or regulating authority investigations.

A primary goal is to maintain information that will meet not only regulatory requirements, but also be transparent and admissible in court. State and local laws supersede any item in the Plan that does not meet regulatory requirements.

Within this plan [cannabis/marijuana] is often referred to as “the product.” Where an “employee” is referred to in this plan, it also includes other individuals involved with Jolly Green Inc, including owners, officers, agents, and others representing the company.

Sensitive records include, but are not limited to, personal identity information, protected health information, credit card data, financial records, intellectual property, password records, information related to a criminal investigation, material covered by any non-disclosure agreements, information identified by regulating authorities as restricted, security and operating records for which the availability would make the company vulnerable to criminal activity, and other information for which the degree of adverse effect that may result from unauthorized access or disclosure is high.

Several record keeping policies overlap with other procedures. Some items are repeated in both the Record Keeping Plan and the other plans, and in other cases, this plan refers to the other documents.

General Record Keeping Policies

Regulatory Compliance

All records associated with business conducted by Jolly Green Inc will be made available to local and state regulatory authorities upon request or on a regular basis as specified by regulations. Records will be stored in a manner that will make them easily accessible in order to comply with immediate requests for information by local and state authorities.

Records specified for retention under state regulations will be retained for seven years. Records not covered by regulatory standards will be retained for no less than three years.

Should Jolly Green Inc cease operations, the owners/board members will come to an agreement with local and state regulating authorities for the retention of and accessibility to required records for a specified period of time.

Anyone who knowingly alters, destroys, mutilates, conceals, covers up, falsifies, or makes a false entry in any electronic or paper record will face immediate termination and potential criminal prosecution.

Any employee who becomes aware of another's intent or action related to knowingly altering company records must report the information to a security officer or a senior manager.

Record keeping procedures 935 CRM 500

- Maintenance of waste disposal records. When marijuana products or waste is disposed or handled, Jolly Green Inc will create and maintain a written or electronic record of the date, the type and quantity disposed or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two Marijuana Establishment Agents present during the disposal or other handling, with their signatures. Marijuana Establishments shall keep these records for at least three years. This period shall automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.
- Record keeping – Jolly Green Inc will keep records make them available to the Commission, upon request. The records of a Marijuana Establishment shall be maintained in accordance with generally accepted accounting principles. Written records

that are required and are subject to inspection include, but are not necessarily limited to, all records required in any section of 935 CMR 500

- Jolly Green Inc will maintain a copy of our written operating procedures. It will contain a set of detailed written operating procedures as required by 935 CMR 500.105(1)
- Jolly Green Inc will maintain written Seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105 (9) C
- Jolly Green Inc will maintain the following written personnel records:

Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions. A personnel record for each marijuana establishment agent. Jolly Green Inc will maintain records 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. Jolly Green will maintain records of employee responsibilities, qualifications, and supervision.
 2. 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
 3. 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.
- documentation of periodic performance evaluations; a record of any disciplinary action taken.

Business record requirements: Jolly Green Inc will maintain the following records.

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

Waste disposal records:

Jolly Green Inc will maintain written waste disposal records per 935 CMR 500 (9) (F).

Paper and Electronic Records

Jolly Green Inc will use a record management software to scan and index/tag paper files and store electronic files to ensure rapid and accurate access to records.

Paper records will be scanned into electronic format for backup purposes on a periodic basis, no less than once per month. Once the electronic version of the paper record has been backed up, the paper version may be shredded (if sensitive) or discarded.

Paper records to be maintained for longer than one month will be filed within two months according to a system designated by the officer responsible for records management, in cabinets or boxes that are clearly labeled, and in a secured location.

Electronic records scheduled for destruction will be managed according to Guidelines for Media Sanitation, NIST Special Publication 800-88, Revision 1.

Electronic file organization will follow recommendations from the National Institute of Standards and Technology.

A records backup and archiving policy will be developed by senior managers using tools for the management of electronic records recommended by the National Archives.

Sensitive business files will be maintained in a separately secured server location from files used on a daily basis by regular employees. Employees will only have access to records needed to carry out their responsibilities.

Backup copies of sensitive archived material will be encrypted or password protected and stored in a secured cloud environment, or, if on removable media, off-site in a vault or safe where it is easy to access and easily reproducible.

All archived records to be kept for more than seven years will be converted into a format that is standardized such that changes in software and technology will not prevent access to the records.

The integrity and authenticity of stored data will be maintained to the level that they could be accepted as evidence in a court of law. Jolly Green Inc will develop a protocol for conducting business on paper in the event of an outage of any electronic system, including the transference of the paper data to the electronic system once the problem is corrected. All employees will be trained on the procedures.

Privacy

A minimum amount of information will be collected during financial transactions with customers to reduce the likelihood that personal information can be stolen.

Only personal information on employees that is required by law will be collected and stored. Employee records, particularly those related to work authorization, potential disciplinary investigations, or background checks will be kept confidential and stored in a secure location.

Any medical information collected on employees or customers will be stored separately and under an extra level of security. These records will be kept in accordance with the Americans with Disabilities Act (ADA), the Genetic Information Nondiscrimination Act (GINA), and/or the Health Insurance Portability and Accountability Act (HIPAA), as applicable.

Employee Involvement

Staff will be asked to review record keeping procedures related to their specific tasks at least once per year and give recommendations for improvements.

Roles and Responsibilities

Chief Compliance Officer

1. The Chief Compliance Officer (CCO) will be responsible for ensuring that this Record Keeping Plan is properly implemented, including dissemination of this plan and the training of employees as to its application. The CCO may designate a Record Keeping Manager to implement certain tasks outlined in this Plan.
2. The CCO will define the structure of a record management system, including a document retrieval system, and maintain training for him/herself and others in the various components of the system.

3. The CCO will develop/maintain an indexing/tagging system which can be utilized to efficiently categorize and retrieve needed data from the document retrieval system.
4. An instruction manual will be written by the CCO describing how to retrieve records from the system. Senior managers will be trained in pulling data from the document retrieval system to ensure that records and datasets can be retrieved immediately upon request from regulating authorities or law enforcement.
5. The CCO is responsible for ensuring the upload of or otherwise providing data from the inventory control or track-and-trace system to the regulating authority in the manner and on the schedule specified by regulations.
6. The CCO will regularly report to the Chief Executive Officer on the status and efficacy of the Record Keeping Plan. The CCO will review the Plan annually and recommend changes or amendments to the Chief Executive Officer to improve procedures or processes.
7. The CCO shall stay up to date on records-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other record keeping experts.

The CCO will coordinate with the officers and managers listed below to ensure that records collected across all departments will be processed according to the Plan.

- Chief Financial Officer
- Security Manager
- Quality Assurance Officer
- Inventory Control Manager
- Computing Security Manager
- Cultivation Manager
- Transportation Manager
- Manufacturing Manager
- Processing Manager

Record Keeping Manager

1. Receiving and organizing documents from all departments
2. Indexing documents in the document retrieval system
3. Recommend changes to the CCO related to the indexing/tagging system

Record Types

Business Records

- Deeds, titles, rental agreements, property records
- Most recent versions of operating plans
- Tax records required by federal, state, and local authorities, including records of late payment penalties and unpaid tax obligations
- Insurance documents
- Permits and licenses
- All correspondence with regulatory authorities
- Up-to-date local and state regulations related to the cannabis license, waste management, environmental compliance, hazardous materials, etc.
- Business documents filed with the Secretary of State
- Business property inventories and related records
- Employee forms, including IRS forms, background check results, documentation of proof of authorization to work, reference verifications, evaluations, and records of investigations and disciplinary actions. Each employee's personal information will only be collected as required by law to reduce potential incidents of identity theft
- OSHA requirements and documentation related to workplace injury, OSHA Form 300, or Form 301 if injuries have occurred
- Property diagrams
- Collective or Cooperative Membership Agreement (if applicable)
- Records relating to physical modification of or upgrades to the premises
- Manufacturer's records related to any generators to be used on the premises and permits or other compliance documentation from air quality regulators
- Labor agreement.
- Staffing plans, organizational charts, and job descriptions.

- Accounting records including, but not limited to, bank statements; monthly, quarterly and annual financial reports; ledgers and journals; vouchers; and all supporting documentation.
- Complete sales receipts/invoices containing all data required by regulating authorities.
- Purchasing receipts/invoices.
- Utility records, including documentation from electrical utility indicating greenhouse gas emission intensity per kilowatt hour (if available).
- Payroll records.
- Records of stipends, bonuses, and non-monetary compensation to individuals or companies, including benefits. The records will include an estimated dollar value for non-monetary compensation.
- Records documenting community involvement.
- Updated emergency contact lists.
- Training records, including type of training offered, date taken, and names of trained employees.
- Meeting minutes and memos.

Security Records

- Training records, including type of training offered, date taken, and names of trained employees.
- Police reports resulting from any crime-related event on the property.
- Contracts with outside security providers.
- Security equipment manuals and maintenance and inspection logs.
- Surveillance video: See the Security Plan for details.
- Completed closing procedure checklists.
- Updated lists of employee access levels.
- Security access logs (See Security Plan, Appendix A).
- Signed Key/Key Card User Agreements (See Security Plan, Appendix B).
- Weekly electronic records showing the date, time, and name of personnel accessing secured areas.
- Completed exiting employee checklists.
- Completed visitor logs (See Security Plan, Appendix C).
- Product delivery logs maintained by security personnel (See Security Plan, Appendix D).
- Records of non-conformance to procedures and reason for variance or steps taken to correct problem.
- Incident reports related to emergencies, chemical spills, accidents, external threats, workplace violence, harassment and other unexpected events.

Inventory Control Records

- All information created within the inventory control/track-and-trace system selected by the regulating authority.
- All UIDs assigned to products in inventory and all unassigned UIDs. UIDs associated with product that has been retired from the track-and-trace system will be retained for six (6) months after the date the tags are retired.
- All attributes associated with each product UID, including name, type, batch, strain, weight/count, source (if transferred in from another licensee), and transaction dates and times. Additional details required by the regulating authority will also be collected and maintained.
- Updated lists of employees with access to the inventory system.
- Training records, including type of training offered, date taken, and names of trained employees.
- Logs of errors found within the inventory system and notes on steps taken to correct errors.
- All inventory results, including the date, time, and names, signatures, and titles of inventory takers.
- Records regarding missing inventory and documentation of follow-up actions.
- Records of inventory discrepancies reported to law enforcement and/or regulating authorities.
- Documentation regarding notifications from the inventory system that cannot be resolved within the specified timeframe.

In addition to records required by regulations, electronic sortable reports related to the following will be producible for management purposes.

Location of all products on the premises by room/cabinet/storage location, including UID, description, date and time transferred to location, weight or count, name or ID of employee. Reports of products removed from a storage location, including date and time, UID, description, name or ID of employee, weight or count, and destination.

Reports of transferred products by UID that can be compared electronically pre and post-transfer to identify discrepancies in inventory, and reports of the resulting comparisons. Reports showing trends in sales patterns, demographics, product quality, or other attributes. Additional reports requested by senior managers or regulating authorities.

Computing Security Records

- Signed Network and Computing Resources User Agreements (See Security Plan, Appendix E).
- Software contracts/licensing documentation.
- Electronic record retention policies.
- Documentation of unauthorized attempts to access the computer network.
- Records of device, software, operating systems, and network security updates.
- Results of security audits.
- Certifications of electronic records destruction or disposal.
- Other records selected by the Computing Security Manager for backup to the records management system.

Cultivation Records

In addition to the records specified in the Business, Security, Inventory Control, and Computing Security Records sections above, [Company] will retain the following records related specifically to cultivation activities:

- Training records, including type of training offered, date taken, and names of trained employees.
- Scale calibration logs.
- Chemical Safety Data Sheets.
- Records relating to the disposal of product waste, including product UID, description, date of disposal, weight or count of product, reason for disposal, and method of disposal.
- Records relating to the disposal of hazardous waste.
- Environmental compliance documentation.
- Documentation of the previous use of land (if applicable).
- Water supply records.
- Records relating to weighing devices.
- Equipment manuals and maintenance and inspection logs, including chemicals used for cleaning.
- Record of internally-identified biological, chemical, physical or other contamination hazards and steps taken to resolve issues.

- Sampling and testing specifications and results and other quality assurance documentation.
- Janitorial logs relating to sanitation of facilities.
- Maintenance logs, including inspection and repair, relating to lighting, irrigation and ventilation systems, pest control systems, water and effluent discharge systems, etc.
- Record of product complaints and steps taken to resolve issues.
- Adverse event records (related to a negative effect of a product on a user).
- Records relating to product rejections or recalls, including a recall plan.
- Records of non-conformance to procedures and reason for variance or steps taken to correct problem.
- Documentation of data utilized for setting prices and rationale for the selected price.
- See the Cultivation and Chemical Safety Plans for additional record types related to planting, pruning, propagation, harvesting, and fertilizer and pesticide use.

Transportation Records

- In addition to the records specified in the Business, Security, Inventory Control, and Computing Security Records sections above, Jolly Green Inc will retain the following records related specifically to transportation activities:
- Transportation manifests showing all information required by regulating authorities.
- Records showing trip plans and the start and end times of each trip.
- Documentation of approved changes to trip plans.
- Transportation Event Logs of variances between expected and actual trip activities.
- Records of vehicle accidents.
- Records and police reports related to product losses occurring during transportation activities.

Manufacturing Records

In addition to the records specified in the Business, Security, Inventory Control, and Computing Security Records sections above, [Company] will retain the following records related specifically to manufacturing activities:

- Training records, including type of training offered, date taken, and names of trained employees.
- Chemical Safety Data Sheets.
- Records relating to the disposal of product waste, including product UID, description, date of disposal, weight or count of product, reason for disposal, and method of disposal.
- Records relating to the disposal of hazardous waste.
- Environmental compliance documentation.
- Records relating to weighing devices.
- Equipment manuals and maintenance and inspection logs, including chemicals used for cleaning.
- Product specifications.
- Sampling and testing specifications and results and other quality assurance documentation.
- Record of identified biological, chemical, physical or other contamination hazards and steps taken to resolve issues.
- Record of product complaints and steps taken to resolve issues.
- Adverse event records (related to a negative effect of a product on a user).
- Records relating to product rejections or recalls, including a recall plan.
- Records of non-conformance to procedures and reason for variance or steps taken to correct problem.
- Janitorial logs relating to sanitation of facilities.
- Documentation of data utilized for setting prices and rationale for the selected price.

Packaging and Labeling Records

In addition to the records specified in the Business, Security, Inventory Control, and Computing Security Records sections above, [Company] will retain the following records related specifically to packaging and labeling activities: Training records, including type of training offered, date taken, and names of trained employees.

Dispensary Records

In addition to the records specified in the Business, Security, Inventory Control, and Computing Security Records sections above, [Company] will retain the following records related specifically to dispensary activities:

- Training records, including type of training offered, date taken, and names of trained employees.
- Records required relating to the sale of products to medical patients (if applicable).
- Documentation of data utilized for setting prices and rationale for the selected price.
- Records of non-conformance to procedures and reason for variance or steps taken to correct problem.

Other Records

- Records relating to the disposal of product waste, including product UID, description, date of disposal, weight or count of product, reason for disposal, and method of disposal.
- Records relating to weighing devices.
- Equipment manuals and maintenance and inspection logs, including chemicals used for cleaning.
- Record of identified biological, chemical, physical or other contamination hazards and steps taken to resolve issues.
- Records of non-conformance to procedures and reason for variance or steps taken to correct problem.
- Janitorial logs relating to sanitation of facilities.

Quality Assurance Plan



Addendum - Operating Policies and Procedures Plan (Quality Control and Testing Procedures) related to the CCC regulations.

Jolly Green shall ensure that only the leaves and flowers of the female marijuana plant are processed accordingly in a safe and sanitary manner as prescribed below in accordance with 935 500.105(3).

1. Well cured and generally free from seeds and stems.
2. Free from dirt, and sand, debris, and other foreign matter.
3. Free of contamination by mold, rot, other fungus, and bacterial diseases.
4. Prepared and handled on food-grade stainless steel tables.
5. Packaged in a secure area in accordance with 935 CMR 500.105(3).

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Introduction

Jolly Green Inc is committed to applying a quality management system to all activities carried out in the course of business. The system is designed to ensure that all products sold are in compliance with regulations, are safe for consumption and free of any undesirable components, and provide a beneficial experience for product users.

The quality management system is also designated to evaluate and improve company processes associated with other business activities, including, but not limited to security, recordkeeping, waste management, inventory control, as well as any operations related to production or transportation of the product.

For the purposes of this plan, quality assurance is defined as processes designed to ensure that quality products and services are provided. The Quality Assurance Plan is the primary component of Jolly Green Inc's quality management system, including evaluations of the processes described in this and other operating plans.

Quality control is defined as tasks implemented to ensure the quality of each product and service before it reaches the customer and reporting issues to quality assurance staff such that processes can be improved. Inspections and testing of products and equipment, and specific task procedures to perform these make up the bulk of quality control activities.

Within this plan cannabis/marijuana is referred to as "the product."

Where an "employee" is referred to in this plan, it also includes other individuals involved with Jolly Green Inc, including owners, officers, agents, and others representing the company.

Roles and Responsibilities

Quality Assurance Officer

In order to be effective, Quality Assurance Officer (QAO) will be a member of the senior staff, and be involved in the highest level of decision making related to changes to policies and processes, as well as the introduction of new systems, equipment, and products, such that potential quality issues may be identified prior to the implementation of the activity.

1. The QAO will have at a prior experience in quality assurance in a related industry with at least two of those years including supervisory responsibilities.
2. The QAO will be involved in the vetting and selection of new vendors which will be supplying equipment or other materials that will come into contact with the product, including the product itself, [Add to or delete from the following list to match the activities of your company] packaging, chemicals, scales, agricultural supplies, manufacturing equipment, etc.
3. The QAO will be involved in implementing improvements to plans, products, and systems within the company in response to employee, customer, and regulating authority feedback.
4. The QAO will regularly meet with each person responsible for implementing an operating plan and review each item for potential improvement ideas.
5. The QAO will be on the distribution list to receive correspondence and notices from the regulating agencies related to changes in procedures or regulations.
6. When procedures are updated either due to regulation changes or improvements to systems, the QAO will coordinate with managers to update training for employees.
7. The QAO will be responsible for implementing the Recall Plan.
8. The QAO shall stay up to date on quality-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other quality assurance experts.
9. The QAO will maintain updated procedures [describe location here]. Employees will be notified when a new updated procedure is made available.

The QAO will be forwarded all records related to the following:

1. OSHA-reportable incidents
2. Emergencies
3. Chemical spills
4. Accidents
5. Non-conformance to procedures by any staff member
6. Inspection or maintenance logs produced outside the purview of the QA team in which problems, repairs, or other issues are documented
7. Product rejections or recalls
8. Product complaints from customers or adverse events and steps taken to resolve issues
9. Internally-identified biological, chemical, physical or other contamination hazards and steps taken to resolve issues
10. Vehicle accidents
11. Product loss, theft, or diversion
12. Changes to procedures

Quality Control & 935 CRM 500 sanitary requirements

Quality Control is a task-driven activity carried out by Managers and Supervisors who are involved in the growth, harvesting, testing, production, and packaging of the product according to written procedures. Various systems, including the inventory control system, checklists, logs, chain of custody forms, and other instruments will be used as engineering controls to prompt employees to adequately monitor the product and the associated environments.

- Jolly Green Inc will insure all marijuana products, will comply with the following sanitary requirements:
- 1. Any employee whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements;
- 2. Any employee or agent working in direct contact with preparation of marijuana or nonedible marijuana products shall conform to sanitary practices while on duty

including: Maintaining adequate personal cleanliness; and washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.

- Jolly Green Inc will supply employees with hand-washing facilities that are adequate and convenient. That include running water at a suitable temperature. Hand-washing facilities shall be located in the production areas. Jolly Green Inc will train employees in good sanitary practices. Jolly Green Inc will require employees to wash and sanitize their hands and provide sanitary towel service or suitable drying devices.
- Jolly Green Inc will provide sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations.
- Jolly Green Inc will require litter and waste to be properly removed, disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests.
- Jolly Green Inc will construct floors, walls, and ceilings in such a manner that they may be adequately kept clean and in good repair.
- Jolly Green Inc will insure all contact surfaces, including utensils and equipment, shall be maintained in a clean and sanitary condition. Such surfaces shall 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. Equipment and utensils shall be so designed and of such material and workmanship as to be adequately cleanable.
- Jolly Green Inc will insure all toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products.

- Jolly Green Inc will provide a water supply shall be sufficient for necessary operations. The water supply shall be capable of providing a safe, potable, and adequate supply of water to meet the Marijuana Establishment's needs.
- Jolly Green Inc will provide plumbing of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the Marijuana Establishment. Plumbing shall properly convey sewage and liquid disposable waste from the Marijuana Establishment. There shall be no cross-connections between the potable and waste water lines.
- Jolly Green Inc will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair.
- Jolly Green Inc will provide the storage and transportation of finished products in conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers.
- Jolly Green Inc shall comply with sanitary requirements. All edible products shall be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: Minimum Sanitation Standards for Food Establishments.
- Jolly Green Inc will insure that no marijuana will be sold for adult use 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.

Jolly Green Inc has developed an Adverse Event and Recall plan on found on page 8 of this hand book. The plan responds to laboratory results that indicate contaminate levels above the acceptable limited established DPH protocols 935 CMR 500.160.2

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Plant Inspection

Employees will inspect the growing plants on a daily and ongoing basis for any signs of nutrient deficiency, pest infestation or damage indicating any sub-optimal conditions. Any problematic symptoms will be reported to the Manager or Supervisor on duty immediately. Problematic symptoms include, at the minimum:

1. Leaves, stems or roots with unusual appearance
2. Stunted growth or discoloration of the plant
3. Unusual resin production quantities
4. Unusual odors
5. Any visible mold, mildew, fungus or other contaminant
6. Insect damage on leaves and stems
7. Visible insects, larvae or eggs on plants
8. Any other visible evidence of deficiency, disease or pests

The Manager is responsible for determining what corrective action, if any, is necessary to correct deficiencies, treat disease or mitigate pests. All treatments will be in accordance with local and state laws and include substances known to be harmless to consumers. The Manager is responsible for determining under what circumstances growing plants should be removed from the cultivation area due to deficiencies, disease, pests or any other factor.

Equipment Inspection

The Facilities Manager will work with the QAO to conduct regular testing of all cultivation, manufacturing, packaging, and environmental equipment to ensure proper cleanliness and sanitation levels are being maintained and that no known contaminants are present.

Equipment used for cultivation and manufacturing must be in working order and properly used according to the manufacturer's directions.

Personnel will immediately report any damaged, malfunctioning or inoperable equipment to the Manager or Supervisor.

Sampling and Testing

Representative samples of all materials will be tested for cannabinoid profile and contaminants. The per-batch procedure is as follows:

1. During cultivation: A standard sample size of five (5) grams of plant material is taken from the top, middle and bottom of one plant in each section of the canopy at harvest.
2. During manufacturing: Follow the guidelines provided by the testing laboratory in the selection and preparation of samples.
3. These samples are submitted to identify any unwanted residues and to assure that Cannabinoid and Terpene results are representative of the entire batch. These samples are also utilized for Pesticide and Mold/Microbiological screening to assure that our products meet the highest standards; to be free of pesticide residue, and mold/microbiological counts below thresholds set by the Manager, the American Herbal Pharmacopoeia, and state regulations when applicable.
4. The Manager will determine whether additional testing is necessary.
5. All test results should be recorded in the inventory control system.
6. All paper documents related to testing should be forwarded to the QAO and preserved for future reference, recall, etc., in accordance with the Document Retention and Destruction procedure.
7. Procedures for testing plants and harvested material should conform to the Testing procedure developed by Napro Research for the project.

Packaging and Labeling

Products that are made available to consumers will be contained in packaging that bears labels containing the following information, in addition to any other information that may be required by law:

1. The name and contact information of the cultivation licensee, manufacturing licensee, and all agents who have handled the product in the chain of custody
2. The weight
3. The quantity of THC, CBD, and any other relevant compounds

4. The date of manufacture or production
5. The expiration date, if applicable
6. A complete list of ingredients if the product contains anything other than natural plant materials.
7. A unique identifier that allows ease of traceability, from seed to sale, in the event of a product recall.

Packaging managers and the QAO will develop engineering controls to ensure that packaging and labeling systems are checked prior to each printing to ensure compliance.

Adverse Event and Recall Plan

Jolly Green Inc has established a written SOP to receive, evaluate, store and respond to all complaints regarding the product and adverse events. Should Jolly Green Inc receive a complaint, senior managers will promptly evaluate the report to determine if the event constitutes a substantive or serious adverse event (SAE), due to contamination, expiration, or other circumstances that render the product unsafe or unfit for consumption, and make an appropriate response, up to and including recall of the batch.

Jolly Green Inc policy includes notifying the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch. The notification must be from both the Marijuana Establishment and the Independent Testing Laboratory, separately and directly. The notification from the Marijuana Establishment must describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination. Jolly Green Inc will maintain the results of all testing for no less than one year. Jolly Green Inc clones are subject to these testing provisions, but are exempt from testing for metals. Jolly green Inc will insure all transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services shall comply with 935 CMR 500.105(13). Jolly Green Inc will insure all storage of marijuana at a laboratory providing marijuana testing services shall comply with 935 CMR 500.105(11).

The U.S. Food and Drug Administration as any adverse drug experience occurring at any dose that results in any of the following outcomes:

1. Life-threatening
2. Death
3. Hospitalization - initial or prolonged
4. Congenital anomaly/birth defect
5. Disability or permanent damage
6. Required intervention to prevent permanent impairment/damage
7. Other serious events.

Adverse Event Planning

The QAO will carry out the following activities prior to the distribution products.

1. Maintain records of training for managers and other designated personnel, who will serve as an Adverse Event Team and be responsible for recording and investigating adverse events.
2. Regular employees will be trained to ask a user with a complaint if they wish to report an adverse event, and, if so, immediately bring in a team member to handle adverse event reporting.
3. Develop forms or other documentation controls to be provided to the team to ensure the appropriate information is collected, including an event-specific Adverse Event Log that documents all activities carried out by the Team through the entire process.
4. Ensure that any personal or medical information associated with an individual reporting an adverse event will be protected as sensitive information, stored in a secured location, and disposed of according to the Recordkeeping Plan.
5. Based on guidance provided by the regulating authority, develop a process to determine under what circumstances a reported adverse event will be considered a substantive event or SAE, which will trigger a report to regulating authorities, an investigation, and a possible recall of the product batch.

Adverse Event Recording & Investigation

Once a user indicates an interest in reporting an adverse event, the Adverse Event Team will immediately begin following the procedure below.

Information gathering:

1. The contact information for the person who experienced the symptoms
2. The contact information for the person reporting the event, if different than the user

3. The contact information for the doctor or medical facility who treated the user after symptoms appeared
4. Product labeling details
5. Method of administration to user
6. Dose ingested
7. Resulting symptoms
8. Method of storing product after purchase
9. Unusual odors or appearance

Distribute gathered information to the QAO and other members of senior management.

Within 18 hours, senior managers will apply the process to determine if the reported event is substantive or qualifies as an SAE. If so, the Adverse Event Team will continue with the Adverse Event Recording and Investigation procedure below.

Notify others as soon as possible. Note all contacts in the Adverse Event Log. If the contact occurs by phone, the person notified, their contact information, and the date and time of the call will be recorded.

1. Notify the regulating authority of an adverse event by email or telephone immediately, and by written statement within twenty-four hours.
2. Using information from the label, the Senior Cultivation/Production Manager and the Inventory Control Manager will assist the Adverse Event Team in identifying the location of other products from the same batch.
3. If the product was distributed by Jolly Green Inc to other entities, all purchasers that received products from the same batch will be notified by telephone immediately and provided with batch details.
4. If the product was purchased from a vendor, the vendor will be contacted immediately and provided with details from the adverse event report.

Secure unsold items from the specified batch(es).

The Team will pull unsold items and store them in a secured location during the investigation.

Investigate

1. Review any log or record that may indicate there was a deviation from the SOP in the production of the product.

2. If any deviation or omission of procedure appears to have occurred, the Team will initiate prompt personnel interviews to determine the cause of the deviation.
3. If available, submit two samples from the batch to an independent testing laboratory approved by the department to perform required testing. Jolly Green Inc will request that the testing laboratory perform a comprehensive array of tests to determine if specifications were met including the testing of pesticides, cannabinoid profile, and any other tests that may aid the investigation.
4. Compare against similar complaints, if any, to determine if there is a pattern that may lead to the discovery of a problem that can be corrected.

Develop a response and notify others.

1. If the product meets specifications and there is no contamination, a report will be produced by the Team including a description of the investigation and results.
2. The report will be sent to all parties involved in the adverse event process.
3. If the investigation finds that the batch or lot fails to meet specifications, Jolly Green Inc will order a prompt recall, following the plan below.

Recall Plan

In the event that a product is found to be contaminated, all products derived from or included in the batch will be recalled to minimize risk of further adverse effects.

1. Jolly Green Inc will assemble a list of any batch that could be contaminated.
2. Using the inventory control system, Jolly Green Inc will compile records of all purchasers of the contaminated batch(es).
3. The Adverse Event Team will contact all purchasers and inform them of the serious adverse event, resulting investigation, and provide instructions for returning any unused portion of the recalled product.
4. [Company] will have a list of all purchasers that will be used to authenticate returns or claims for reimbursement, which will be updated upon each reimbursement to ensure there are no duplicate claims.
5. Purchasers of a recalled products will receive store credit or monetary reimbursement, not to exceed the original value of the purchase.
6. Jolly Green Inc will make any information available that may aid other permitted businesses in notifying other relevant entities.
7. Recalled material in the facilities' existing inventory will immediately be placed into a sealed container labeled with "RECALLED MATERIAL". Any returned products will also be placed in the segregated container. These items will be stored in a secured location until disposal.
8. The Inventory Control Manager will update the inventory control system noting the recalled status of each item.
9. Once disposal has been approved, Jolly Green Inc will dispose of recalled products within 24 hours in accordance with the waste disposal SOP and all applicable state and local regulations.
10. The Adverse Event Log will be updated with details of the product disposal.

Adverse Event Documentation

The Recordkeeping Manager will record, file, and store for five years, or for time period specified by state regulations, all of the following information about all complaints:

1. Forms documenting the original Adverse Event Report.
2. Any records showing non-compliance with procedures.
3. Records recording the results of interviews with employees.
4. Pre and post-event test results on the product batch.
5. Copies of letters or logs showing contact with other companies, customers, and the regulating authority.
6. The final report of conclusions after completion of the investigation.
7. Documentation of the disposal of the contaminated products.
8. The final copy of the Adverse Event Log.

Addendum - Operating Policies and Procedures Plan (Restricting access to Individuals 21 or older) related to the CCC regulations.

1. Jolly Green shall apply for registration for all its employees, Owners, Executives and volunteers who are associated with that Marijuana Establishment. The Commission shall issue an Agent Registration Card to each individual determined to be suitable for registration. All such individuals shall be 21 years of age or older in accordance with 935 CMR 500.030.

2. Jolly Green shall verify all visitors are 21 years of age or older in accordance with 935 CMR 500.002.

Staffing and Training Plan



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Addendum – Operating Policies and Procedures (Detailed Description of Qualifications & Intended Training for Agents) related to the CCC regulations.

1. Jolly Green shall ensure that employees receive a minimum of eight hours of ongoing training annually in accordance with 935 CMR 500.105(2).
2. All current owners, managers, and employees shall complete the Responsible Vendor Program after July 1, 2019 or when available in accordance with 935 CMR 500.105(2).
3. All new employees shall complete the Responsible Vendor Program within 90 days of being hired in accordance with 935 CMR 500.105(2).
4. Responsible Vendor Program documentation will be retained for four years in accordance with 935 CMR 500.105(2)

Introduction

The information in this plan is designed to provide guidance for managers and supervisors related to the responsibilities of staffing and hiring. This plan is designed to support the development of human capital and staff capabilities in order to maximize the efficiency and effectiveness of the organization. It will be reviewed and updated six months after the company starts operations and annually thereafter to adapt to changes in the needs of the company or trends in the industry.

is committed to following all local, state and federal laws related to labor and employment. Jolly Green Inc will adhere to requirements as described by:

- The Wage and Hour Division of the U.S. Department of Labor
- The MA. State labor regulator of labor.

Jolly Green Inc 's employment practices are based on job qualifications, performance, and conduct without regard to race, color, religion, national origin, age, sex, marital status, height, weight, disability, genetic information, or any other legally protected status.

The Jolly Green Inc provides reasonable accommodation to qualified individuals with disabilities

in accordance with the law. Any employee with a need for accommodation due to a disability will be encouraged to notify his/her supervisor as soon as possible.

It is in our best interest to hire individuals according to planned needs. The staffing portion of this plan is designed to estimate the positions that will be necessary to efficiently manage the business and specify the job descriptions and expected qualifications for each.

General Staffing Policies

Jolly Green Inc will use best practices to staff positions and retain employees. The following policies will be carried out to ensure efficient operations:

- Include managers in the hiring process for positions they will be responsible for supervising.

- Ensure that an adequate number of employees are hired and scheduled for each shift to reduce stress caused by continuous overwork.
- When appropriate, employees will be cross trained such that they may provide assistance to another department that temporarily becomes busier than normal.
- Ensure that backup support is available through a system of on-call or part-time workers in case scheduled staff cannot come in for a shift.
- Managers will maintain a combined record of additional educational qualifications and skills that employees have such that new opportunities may be filled from within the company when possible.
- Utilize a Hiring Tracker (Appendix A) to manage the status of hiring employees.
- Utilize a variety of recruiting resources, including online career websites, recruiting agencies, job fairs, placement departments at training agencies, etc.
- Utilize an Intake Checklist (Appendix B) to ensure all documentation is properly collected and activities associated with hiring an employee are completed.
- Provide an environment in which employees feel respected and appreciated for quality work.
- An Employee Handbook will be provided to all staff as part of the training process specifying expected behaviors, company policies, and a disciplinary procedure.
- Managers will be trained in best hiring practices, effective training techniques, and appropriate evaluation methods, which are further detailed in sections below.
- Staffing plan records: Jolly Green Inc shall maintain a staffing plan and staffing records in compliance with 935 CMR 500.105(9).
- Jolly Green Inc is an alcohol, smoke, and drug-free workplace.
- Jolly Green Inc will provide a plan describing how confidential information will be kept and maintained.
- Jolly Green Inc has 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.

Staffing Requirements

The following table specifies the essential staffing positions that need to be filled and anticipated associated costs related to their functions.

Primary Employee	Man-hours/Week	Function	Relative Importance of Function	Estimated Cost/Mo.*	Notes
Chief Executive Officer	N/A	Overall Business Management	Critical		
Chief Compliance Officer	40	Compliance with Regulations and Procedures	Critical		
Chief Financial Officer	40	Finances and Accounting	Support		
Security Manager	40	Security Management	Critical		
Computing Security Officer	20	Computer Security	Support		
Inventory Control Manager	40	Inventory Control Management	Critical		
Facilities Manager	40	Facility Management	Critical		
Facilities Asst Manager/Staff	40	Facility Management Support	Support		
Quality Assurance Officer	40	Quality Assurance	Support		

Record Keeping Manager	40	Record Keeping	Support		
Security Staff	196 (2 during all business hours)	Security Operations	Critical		
Inventory Control Staff	40	Inventory Control Operations	Critical		
Sales Manager	40	Sales	Critical		
Facilities Staff	40	Facility Operations	Support		
Cultivation/ Mfg. Manager	40	Cultivation/ Mfg. Operations	Critical		
Cultivation/ Mfg. Staff	168	Cultivation/ Mfg. Support	Critical		

*Estimated Cost refers to monthly salary/benefits, payroll taxes and other insurances.

Organizational Chart

Board of Directors

Chief Executive Officer

Chief Compliance Officer

Inventory Control Manager

Inventory Control Staff

Computing Security Manager

Security Manager

Security Staff

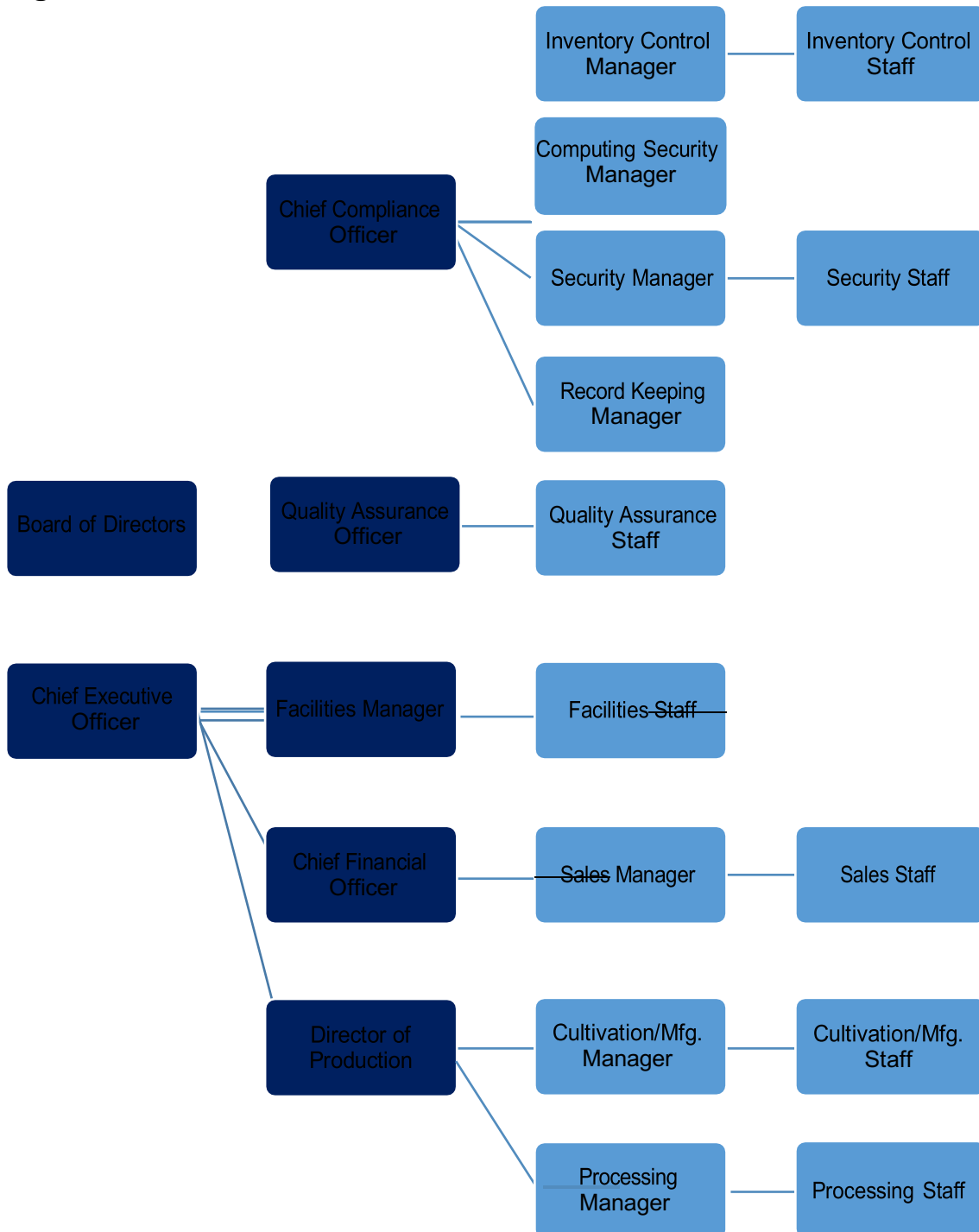
Record Keeping Manager

Quality Assurance Officer

Quality Assurance Staff

Facilities Manager
 Facilities/Janitorial Staff
Chief Financial Officer
 Sales Manager
 Sales Staff
Director of Production Cultivation
 Cultivation/Manufacturing Manager
 Cultivation/Manufacturing Staff
 IPM/Pest Control Manager
 Propagation Manager
 Trimming/Processing Manager
 Processing Staff

Organizational Chart



Job Descriptions

Chief Executive Officer

The Chief Executive Officer (CEO) is the primary representative of the company to regulators, law enforcement, and the public and provides direction and leadership in the company's mission, vision, values, and strategy. The CEO implements and manages the strategic services, goals and objectives of the organization. It is also an important role of the CEO to set an example of professionalism and respect for others in all areas of operations.

Responsibilities include, but are not limited to:

- Operate the organization according to direction provided by the Board of Directors.
- Facilitate an open communication system to support operations and administration of the Board by advising and informing its members.
- Report progress and statistical performance measures to the Board on a quarterly basis.
- Oversee all operations and business activities to ensure they produce the desired results based on goals and timelines.
- Hire qualified personnel for Executive Staff positions.
- Build and maintain a positive working relationship with Executive Staff and be open to suggestions for improvements from employees.
- Enforce adherence to legal guidelines and standard operating procedures to maintain the company's legal status and business ethics.
- Implement the Business Plan and make suggestions for its improvement.
- Set goals for performance and growth.
- Review financial and other reports to track business performance and devise methods for improvements.
- Build relations with key partners and stakeholders and act as a point of contact for investors.
- Foster a spirit of cooperation, respect and professionalism among employees and other executives.
- Analyze problematic situations and occurrences and provide solutions to ensure company success and growth.
- Maintain a deep knowledge of the cannabis markets and industry
- Stay up to date on management-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations,

participating in conferences, and/or other means of networking with and learning from other management experts.

Requirements:

- BA in business required
- 2 years of experience working in the pharmaceutical or cannabis field desired
- In-depth knowledge of corporate governance and general management best practices
- Ability to demonstrate an understanding of business functions, including finances, HR, sales, and marketing
- Strategic planning and business development experience
- Excellent communication skills
- Ability to pass a background check

Chief Compliance Officer

The Chief Compliance Officer (CCO) reports to the CEO and is responsible for implementing the Security Plan, the Inventory Control Plan, and the Record Keeping Plan by managing designees who will be responsible for a subset of tasks.

Responsibilities include, but are not limited to:

- Manage security compliance according to state guidelines and the Security Plan.
- Have a sufficient understanding of computing security to the extent that he or she is able to select a qualified individual or contractor to implement the computing security component of the Security Plan.
- Manage a budget covering compliance-related resources.
- Work with local and state government agencies on environmental issues and specific licensing requirements.
- Serve as the company's secondary expert (after the Inventory Control Manager) in the use of the Inventory Control System and ensure compliance with all related regulations.
- Monitor and interpret the regularly changing rules of state cannabis commerce and communicate with staff accordingly.
- Define the structure of a record management system, including a document retrieval system, in compliance with the Record Keeping Plan.
- Oversee the training compliance system for all employees.
- Work closely with the Quality Assurance Officer to monitor and improve the implementation of standard operating procedures.

- Oversee the maintenance of records such that requests for information from regulating authorities or law enforcement will be met by required deadlines.
- Foster a spirit of cooperation, respect and professionalism among employees and other executives.
- Stay up to date on compliance-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other compliance experts.

Requirements:

- Ability to demonstrate an extensive knowledge of state and local cannabis compliance laws
- Proficiency or willingness to rapidly undertake extensive training in the use of the state's selected inventory tracking system
- 3 years of experience in management or HR in a related industry
- Familiarity with team building and training employees on compliance issue
- Motivated self-starter and proficient at multi-tasking
- Aptitude in solving problems independently
- Strong verbal and written communications
- Sound decision-making ability
- Ability to pass a background check

Inventory Control Manager

Under the direction of the CCO, the Inventory Control Manager (ICM) will be responsible for carrying out tasks specified in the Inventory Control Plan. In consultation with the CCO and the QAO, the ICM will recommend changes and amendments to the Inventory Control Plan on an annual basis.

Responsibilities include, but are not limited to:

- Serve as the company expert on the state-required inventory control system (ICS) and be aware of updates and compliance requirements related to the system
- Act as the point of contact with the system vendor
- Train and manage at least one other employee to have a sufficient knowledge in the use of the ICS to carry out upper level functions in the absence of the ICM and the CCO
- Train incoming employees on the use of the ICS based on the requirements of his or her position

- Foster a spirit of cooperation, respect and professionalism among employees and other managers
- Maintain ICS training records and all other documentation and logs per regulations and procedures
- Keep related equipment in good working condition and secured when not in use
- Develop a method to collect inventory information in the event of loss of access to the electronic inventory system
- Carry out inventory verifications and report discrepancies
- Resolve system notifications within a specified time period
- Run reports from the ICS as requested

Requirements:

- 2-3 years of experience in a management position in a related industry
- 2 years of experience working with a computer-based inventory system
- Experience in the cannabis industry preferred
- Willingness to quickly learn regulations related to inventory control and participate in extensive training to develop an expertise in the ICS
- Ability to pass a background check

Record Keeping Manager

The Record Keeping Manager (RKM) reports to the CCO and is responsible for complying with record-related regulations and implementing tasks in the Record Keeping Plan. Records are maintained to provide operational information to company managers, advisors, and owners for decision-making purposes, and to provide information in case of insurance, criminal, or regulating authority investigations.

Responsibilities include, but are not limited to:

- Manage records within a digital, indexed record management software such that materials may be quickly retrieved in the event of a request from regulators or law enforcement officials
- Work with the CCO to improve indexing or tagging categories to apply to each document
- Scan paper records into the record management system on a daily or weekly basis
- Delete or discard digital and paper records according to the company's record retention policy

- Work with the Computing Security Manager to ensure records are stored securely, backed up, and easily accessible

Requirements:

- Must be at least 21 years of age
- Must have at least 2-3 years of administrative or record keeping experience, preferably in a legal, tax or other highly regulated industry
- Experienced in using standard computer programs and able to learn new softwares within a relatively brief time period
- Willing to rapidly become familiar with regulations and record keeping standards
- Able to pass a background check

Security Manager

Under the direction of the CCO, the Security Manager (SM) is responsible for carrying out the bulk of the responsibilities identified in the Security Plan and managing Security Officers.

Responsibilities include, but are not limited to:

- Implement and enforce safety regulations and policies.
- Ensure the protection of people, property, and assets.
- Reduce risks, respond to incidents, and limit liability in all areas of financial, physical, and personal risk.
- Act as liaison to the local Police Department (PD).
- Schedule all security services and officers.
- Manage a budget covering security resources and employees.
- Ensure all security equipment and systems are operated and maintained according to manuals, standard security practices, and the Security Plan.
- Administer the access control program, including the enrollment of personnel in the company's access control system.
- Compile reports as required by the CCO.
- Utilize all security systems to discover security breaches and identify compliance issues.
- Train personnel according to established procedures and conduct regular security meetings to discuss problems and future plans.
- Ensure the maintenance of training records and security logs.
- Manage all visitor access to the facility.
- Act as liaison to all departments on security measures, procedures, and needs.

- If the company also carries out transportation responsibilities Coordinate the security of transportation activities, including the planning of delivery routes to ensure the safety and security of the delivered goods and employees.
- Conduct security evaluations to ensure constant improvement and compliance.
- Ensure the reporting and documentation of all incidents and provide initial information for investigations to the CCO.
- Ensure that all records are forwarded properly according to the Record Keeping Plan.
- Foster a spirit of cooperation, respect and professionalism among employees and other managers.
- Stay up to date on security-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other security experts.

Requirements:

- 5-10 Years Security Management Experience
- Minimum of HS Diploma or equivalent, college degree preferred
- Board certified in security management by ASIS International as a CPP highly preferred
- Must be willing and able to work a flexible schedule based on the demands of the business
- Aptitude for solving problems independently
- Strong verbal and written communications
- Sound decision-making ability
- Ability to pass a background check

Security Staff, Unarmed

Security Staff report to the Security Manager and assist in maintaining the safety and security of the staff, products, and the facility.

Responsibilities include, but are not limited to:

- Conduct periodic inspection of premises to protect against fire, theft, vandalism, and illegal activity.
- Maintain required records and logs.
- Prevent access to any unauthorized persons within the registered premises
- Assist any staff with security access issues.
- Monitor any suspicious behavior by guests, visitors, or personnel.

- Ensure compliance with state and local regulations and company procedures.
- Prepare reports as requested by the Security Manager.

Requirements:

- At least 21 years of age
- A current security guard license or the ability to receive a license, including a background check
- Prior security, law enforcement or military experience preferred

Computing Security Manager

Under the direction of the CCO, the Computing Security Manager (CSM) will manage the security related to data and technology and will be responsible for ensuring compliance with the Computing Security portion of the Security Plan.

Responsibilities include, but are not limited to:

- Interpret and establish security technologies and create an information security framework and architecture that protects sensitive data from threats.
- Monitor computing operations and infrastructure by reviewing alerts and logs on a daily basis.
- Ensure that security tools and technology are maintained and updated.
- Ensure that security vendors are appropriately vetted, meet contractual agreements and comply with regulations and policies.
- Identify patterns in which employees are failing to comply with procedures and recommend additional training or procedure updates to the CCO.
- Foster a spirit of cooperation, respect and professionalism among employees and other managers.
- Manage a budget related to computing resources.
- Evaluate new technologies and make recommendations for their use to the CCO based on industry standards and company needs.
- Audit internal security systems and policies frequently to identify areas needing improvement.
- Develop and maintain a detailed security incident response program.
- Regularly report to the CCO on the status of computing security.
- Stay up to date on computing security-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations,

participating in conferences, and/or other means of networking with and learning from other cybersecurity experts.

Requirements:

- 6-10 years of Computing Security Management experience or a bachelor's degree in computer science, programming or a similar field from an accredited institution and 4 or more years of experience
- Ability to demonstrate an expertise and knowledge of databases, networks, hardware, firewalls and encryption
- Aptitude in solving problems independently
- Strong verbal and written communications
- Sound decision-making ability
- Ability to pass a background check

Quality Assurance Officer

The Quality Assurance Officer (QAO) reports to the CEO and will be involved in decision making related to changes to policies and processes. Guided by the Quality Assurance Plan, he or she will facilitate improvements to plans, products, and systems within the company in response to employee, customer, and regulating authority feedback.

Responsibilities include, but are not limited to:

- Work closely with the Chief Compliance Officer and other managers to monitor and improve Standard Operating Procedures.
- In departments that utilize mechanical equipment, work with managers and employees to develop step-by-step procedures and maintenance logs for the use, sanitation and inspection of each item.
- Assist managers with employee training by preparing instructional materials, hands-on exercises and evaluation tools.
- Complement training conducted by other managers by providing in-person training on issues related directly to quality control.
- Foster a spirit of cooperation, respect and professionalism among employees and other executives.
- Monitor the introduction of new systems, equipment, and products, such that potential quality issues may be identified prior to the implementation of new processes.
- Maintain an awareness of regulations related to SOPs and product quality control.

- Maintain an updated source for all current policy and procedure documents in both paper and digital format and ensure easy access to employees at all levels.
- Work with department managers to conduct job risk analyses and make training and procedure recommendations based on the results.
- Perform a periodic analysis of reports and production data to identify problematic patterns and recommend updates or changes to policies and procedures.
- Assist with regulatory inspections.
- Implement procedures related to adverse events and recalls according to the Quality Assurance Plan.
- Stay up to date on quality-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other quality assurance experts.

Requirements:

- 3 - 5 years of experience in Quality Assurance in a related field or a Bachelor's degree in Quality Assurance from an accredited institution and 1 - 2 years of experience
- Experience in employee training
- Aptitude in solving problems independently
- Strong verbal and written communications
- Ability to think critically and logically in applying systems and processes to meeting company goals
- Ability to pass a background check

Facilities Manager

The Facilities Manager (FM) reports to the CEO and is responsible for building maintenance, environmental controls, operations and safety, janitorial services, sanitation, storage and maintenance of chemicals, and non-cannabis/marijuana waste management.

Responsibilities include, but are not limited to:

- Maintain lighting, HVAC and mechanical systems in excellent working condition.
- Coordinate with the Security Manager to maintain the function and safety of the facility's hardware and infrastructure.
- Manage a budget associated with facilities functions.
- Hire, manage and train facilities staff.

- Create and implement task-specific SOPs and carry out job risk analyses with the assistance of the Quality Assurance Officer.
- Be aware of federal, state and local regulations related to cannabis/marijuana business premises requirements.
- Be familiar with local building code and permit regulations.
- Develop a maintenance and inspection schedule for all building and infrastructure systems.
- Conduct or oversee the routine maintenance and inspection of environmental and other major systems critical to the operation of the organization.
- Develop and maintain logs and checklists to simplify maintenance and inspection activities.
- Schedule and facilitate required inspections by outside organizations.
- Determine which types of work can be handled by company personnel and under what circumstances an outside contractor must be called in.
- Serve as the lead responder to critical equipment malfunctions, including the maintenance of a list of critical equipment and phone numbers to call in case of breakdowns.
- Maintain an on-site inventory of selected equipment parts to facilitate rapid repairs in the event of a malfunction.
- Work with the Security Manager to support the maintenance of security systems.
- Manage chemicals, non-cannabis/marijuana waste and other refuse.
- Train facilities employees in the proper procedures for handling and disposing of chemicals, including the [Globally Harmonized System](#) of Classification and Labeling of Chemicals (GHS) and the use of Safety Data Sheets (SDSs).
- Keep records of training for each training module related to chemicals and non-cannabis waste management for every facilities employee, including the date training occurred, type of training, the signature of the employee upon completion of training, the signature of an authorized person who can verify completion of training, and the date retraining is due
- Forward all records and logs to the Record Keeping Manager
- Become familiar with all company Standard Operating Procedures to identify areas in which the Facilities Department may support other business activities.

Requirements:

- At least 5-10 years of building/facilities management experience, including repairs to mechanical and structural components
- Experience with electrical, HVAC, lighting, plumbing, ventilation and other infrastructure component installation and adjustments
- Experience working with outside vendors and contractors

- Excellent organizational, planning and problem-solving/troubleshooting skills
- Must be able to work independently with limited supervision

Chief Financial Officer

The Chief Financial Officer (CFO) will be responsible for finances and accounting, as well as overseeing activities carried out by the Sales Manager.

Responsibilities include, but are not limited to:

- Perform the day-to-day, monthly and year-end operations of the Accounting/ Finance Department.
- Assist the CEO on all strategic and tactical matters as they relate to budget management, cost-benefit analysis, forecasting needs and the securing of new funding.
- Manage the sales operation of the company through the supervision of a Sales Manager.
- Foster a spirit of cooperation, respect and professionalism among employees and other executives.
- Create financial reports such as P&L, Balance Sheet, Cash Flow and budget performance.
- Present and interpret financial data for the Executive Staff and the Board of Directors.
- Ensure compliance with applicable standards, rules, regulations, and systems of internal control.
- Perform the processing and recording of accounts payable transactions.
- Ensure that all invoices and staff reimbursements are paid accurately and in accordance with standard practices.
- Manage the processing of cash receipts, recording of revenue and receivable.
- Ensure that revenues and receivables are correct and maintained.
- Prepare and record taxes for the company (Sales, Payroll, Local) and work with the CPA on Corporate taxes.
- Perform the processing of functional and benefits expense allocations, monthly accruals, amortization of prepaid expenses, fixed assets depreciation and recording of adjusting and reclassification journal entries, if necessary.
- Perform general accounts analysis and reconciliations, including bank statements, fixed assets, employer's benefit costs, accruals and prepaid expenses
- In cooperation with the CCO and the ICM, ensure that the Point-of-Sale System is fully integrated into the Inventory Control System and be responsible for its accuracy and maintenance.

- Stay up to date on finance-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other finance/accounting experts.

Requirements:

- At least 5 years of experience in accounting for a similar business size and a Bachelor's Degree in Business or Accounting, CPA preferred
- If less than 3 years of experience in sales, willingness to attend training related to managing sales personnel
- Expert knowledge in Quick Books
- Strong organizational skills and ability to prioritize workload in order to meet tight deadlines in a fast-paced and dynamic work environment
- Excellent communication skills, written and verbal, with the ability to clearly communicate issues to all levels of management
- Excellent analytical and problem-solving skills
- Proficient in Microsoft Office (Word, PowerPoint, Excel)
- Highly detail oriented and proficient in record keeping
- Team player and able to collaborate with others in the organization
- Ability to pass a background check

Sales Manager

The Sales Manager reports to the CFO and will serve as the lead in developing sales and marketing strategies that will result in success in a highly competitive industry. A candidate having existing contacts with established businesses will be given preference.

Responsibilities include, but are not limited to:

- Work with the executive team to develop a sales/marketing strategy and identify potential customers.
- Maintain vendor and client databases and relationships.
- Attend and exhibit at trade shows.
- Develop new business relationships in line with the company's strategy.
- Gather related sales data, conduct analyses, and refine the strategy as needed.
- Have a detailed understanding of inventory and prices.
- Guide the marketing strategy based on vendor and consumer feedback.

Requirements

- At least 21 years of age
- A minimum of 3 to 5 years of sales experience in a related industry, previous experience in the cannabis/marijuana industry preferred
- Strong background in developing business relationships
- Articulate, with effective verbal and written communication skills
- Proficiency with sales management and presentation tools
- Ability to pass a background check

Director of Production

The Director of Production reports to the CEO and is responsible for the overall management of cultivation and manufacturing activities.

Responsibilities include, but are not limited to:

- Manage the budgets, overall supply chains, and operations of the cultivation and manufacturing activities.
- Implement the Cultivation and Manufacturing Plans, primarily through the hiring and supervision of the Cultivation and Manufacturing Managers.
- Ensure product safety and work with other department heads to comply with regulations and required security, inventory control, and other procedures.
- Prepare reports on production, expenses, product quality, safety, etc.
- Analyze report results and prepare recommendations for improvements.
- Present data to the other Executive Staff and to the Board of Directors as requested
- Maintain inventory levels to ensure timely delivery of products to customers.
- Research new technologies that may improve efficiency, safety, and productivity and make recommendations to Executive Staff.
- Regularly meet with Managers and the Quality Assurance Officer to discuss potential new technological ideas, improve procedures and ensure compliance with regulations.
- Foster a spirit of cooperation, respect and professionalism among employees and other executives.
- Stay up to date on cultivation/manufacturing-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related

organizations, participating in conferences, and/or other means of networking with and learning from other experts.

Requirements

- A minimum of 3-5 years of experience in cultivation or manufacturing management and leadership experience, including agricultural, pharmaceutical, or herbal medicine industries; Bachelor's degree in a manufacturing or agricultural production field preferred
- A basic understanding of the processes involved in both cultivation and manufacturing; knowledge of the cannabis/marijuana industry preferred
- Strategic planning and business development experience
- Ability to resolve problems with and between employees in a respectful and fair manner, based on sound human resources principles
- Ability to demonstrate experience in improving production and efficiency
- Excellent communication skills, written and verbal, with the ability to clearly communicate issues to all levels of management
- Ability to quickly become familiar with all regulations and Standard Operating Procedures and monitor regulatory updates

Cultivation Manager/IPM Manager

The Cultivation Manager reports to the Director of Production and manages a team of cultivation staff members in the production of high-quality cannabis/marijuana plants and plant materials.

Responsibilities include, but are not limited to:

- Manage a team that handles all aspects of daily cultivation activities in a large-scale indoor grow facility.
- Outline specific roles and responsibilities for plant technicians and work with management to build a team.
- Create and implement task-specific SOPs and carry out job risk analyses with the assistance of the Quality Assurance Officer.
- Provide weekly updates to the Director of Production to consistently re-address grow tactics.
- Maintain indoor plant growing protocols, develop and test nutrient regimens, and strive to improve planting techniques and yields.

- Execute the pest management program including elimination of all types of mold, powdery mildew, spider mites, root aphids, fungus gnats, etc.
- Work with the Inventory Control Manager to perform all cultivation tracking with the inventory control system in compliance with rules and regulations.
- Manage plant scheduling to accurately project all growing requirements on a daily, weekly, and monthly basis to maximize high-quality yield.
- Schedule, manage and oversee cloning processes, achieving a minimum 90% success rate.
- Manage the maintenance of irrigation, climate control systems, cleaning, sanitation, hazard action plans and alert management if there are issues.
- Train employees in task-related processes and health and safety issues.
- Foster a spirit of cooperation, respect and professionalism among employees and other managers.
- Ensure that logs and other records are forwarded to the Record Keeping Manager.
- Work closely with the Quality Assurance Officer to monitor and improve the implementation of standard operating procedures.
- Maintain records such that requests for information from regulating authorities or law enforcement can be met by required deadlines.

Requirements:

- Completion of a course in Plant Pathology from an accredited institution with the equivalent of a B or better as a final grade
- A minimum of 3-5 years of experience managing a marijuana cultivation facility
- Experience developing task-specific procedures and training employees
- Mastery of all grow mediums and irrigation methods
- Experienced in cloning, transplanting, defoliation, super cropping, topping, flushing, pest management, harvesting, drying, trimming, waste disposal and inventory management
- Knowledge of large-scale commercial plant growing including crop rotation management, nutrient requirements, mediums, light requirements, and environmental controls
- Knowledge of plant diseases, pests, and nutrient deficiencies and toxicity
- Advanced knowledge of the cannabis plant and genetics
- Knowledge of industry best-practices and current on new techniques with respect to the nutrient needs of individual strains and high yield recipes
- Strong attention to detail, ability to communicate clearly
- Ability to pass a background check

Training Policies

The Executive Staff are responsible for ensuring that all training required by procedures and regulations is provided at no cost to the employee. Per 935 CMR 500.105(2) and 935 CMR 500.101(1)(C)(8)

The Quality Assurance Manager will also evaluate and identify areas where specified training is lacking, create or advise on providing the new training as needed, and assist in modifying procedures to thereafter require the new training.

The Chief Compliance Officer will designate an employee to keep track of training completion and the frequency of repeated training, as well as manage a reminder system to keep employees informed of due dates of future training.

All employees will have records of training held on site in the administrative offices and archived in the document retrieval system.

The Training Matrix in Appendix C provides a list of training topics and the related operating plan that may be consulted for further details.

Manager Training

Jolly Green Inc will provide the training to managers in the areas of hiring, training, and performing evaluations. Managers are encouraged to suggest additional training topics as needs arise.

Best Practices in Hiring

In order to ensure a hiring strategy that is consistent, in compliance with legal requirements, and that attracts and keeps high quality employees, managers will be trained in the following:

- The importance of evaluating internal and external business trends to estimate the number and types of employees needed. Internal factors include changes in work shifts, workforce demographics, and downsizing. External factors include a merger or acquisition, changes in legislation, etc.

- How to write and update job descriptions, including required qualifications, particularly noting whether the position requires skills that have already been learned or if on-the-job training is appropriate. Preparation should include asking the following the questions:
 - (a) what skills, knowledge, and abilities are required for the job;
 - (b) what are some of the characteristics of the people who succeed or fail in the job;
 - (c) what qualifications are needed for the job; and
 - (d) how does the job relate to others.
- To avoid illegal screening of applicants with disabilities, list job duties describing only what the necessary tasks are, rather than how the tasks are normally performed.
- The need to develop an interview guideline to ensure a similar process is used during all interviews for the same position. The guideline should include standardized questions given in a specific order, a relatively controlled length of time for the interview, and a standardized evaluation form to be filled out by the interviewer.
- Take into account that people may feel anxiety during a formal interview, which may misrepresent their true potential.
- Clearly communicate to potential employees the salary, work schedule, and potential future opportunities within the company to reduce misunderstandings after hiring.
- Ask appropriate questions during the interview process to match a potential employee's likes and dislikes with a position that fits their personal preferences.
- Limitations on what an interviewer may ask related to age, disabilities, etc., to be in compliance with regulations.
- If any pre-employment testing is utilized, only testing instruments may be used that are clear and understandable, have been demonstrated as valid for the skills being assessed, and are appropriate for the target population.
- References must be checked and adequately documented.
- All documentation is forwarded to the Record Keeping Manager.

Effective Training Techniques

- Provide adequate training to employees prior to their first day of work.
- Utilize a variety of instruction methods, such as writing on a board, digital presentations, viewing videos, storytelling, etc.
- Involve students interactively through the use of quizzes, small group activities, case studies, Q&A sessions, question cards, role playing, physical demonstrations, identifying problems in a scene, etc.
- Where appropriate, hands on training is preferred to other methods.
- Upon hiring new employees after the business has started operations, match experienced personnel with beginners to provide support when questions or emergencies arise.
- Each in-person training session must have a sign-in sheet that is used to document the employee's fulfillment of a training requirement. The sheet should include the name of the training module, the date training occurred, the signature of the employee upon completion of training, the signature of an authorized person who can verify completion of training, and the date retraining is due. The completed sheet is forwarded to the Chief Compliance Officer (CO) and the Record Keeping Manager.

Evaluating Employees

- Carry out regular evaluations to provide positive feedback to workers and identify areas where more training or effort on the part of the employee may be needed.
- Design the evaluation such that an employee feels more confident about doing his/her work after the meeting.
- Avoid stereotyping an employee by gender, culture, disability, etc., which can lead to a misinterpretation of an employee's responses or behavior during an evaluation.

- In addition to annual performance reviews, managers may wish to carry out more frequent “check-ins” to learn about employee concerns and suggest small modifications to processes.
- Prior to an evaluation:
 - Select a private location for the evaluation that will reduce potential interruptions.
 - Schedule an appointment with the employee, giving him/her enough time to prepare. Provide the employee with his/her job description and have the employee prepare a short self-evaluation. The employee may already be aware of shortcomings in his or her work that need to be addressed.
 - Review the employee’s file, including results of prior reviews.
 - Review any datasets that provide information on the employee’s work effort, such as sales results or productivity indicators.
 - Compile any information that has been learned from communication with supervisors or coworkers that may need to be addressed during the meeting.
 - Identify accomplishments for which the employee deserves positive recognition.
 - Prepare a list of questions to ask to help identify areas that may need improvement and to gauge the employee’s job satisfaction.
 - If an employee’s performance needs to improve, decide ahead of time if it will be a verbal or written warning. Verbal warnings should be documented in the employee’s file. If a written warning is appropriate, prepare a detailed list of expectations based on policies and procedures that will need to be met. This may be presented as a Notice of Needed Improvements (Appendix D).
- If an employee makes any negative comments or becomes emotional, view it as an opportunity to learn about a concern. Do not be critical of an employee’s emotions. The conversation should be refocused on facts rather than assumptions or feelings. The evaluator should work with the employee to identify a solution to the problem, if not during the meeting, then as soon as possible thereafter.
- Do not insult an employee. Concerns about his or her work must be presented honestly, and simply described as the need to meet specific expectations.
- Explain to the employee what the impacts are of his/her inappropriate behavior.
- Employees should be given an opportunity to improve performance before written disciplinary documentation is placed in his/her file. Find out if repeated tardiness, extensive periods of time on the phone, or other behaviors are due to difficulties that could be helped with counseling or other assistance.

- Prior to implementing a disciplinary procedure, the manager should verify the facts regarding the misconduct and confirm the company's policy on the issue.
- If the employee has been provided with a list of needed improvements, both the manager and the employee should sign and date it. A copy should be given to the employee and the original placed in the employee's file. The manager should follow up with the employee and give positive feedback if appropriate or review the disciplinary procedure and next steps that will occur.
- The Disciplinary Policy in the Employee Handbook should be written with a clear understanding of the rights of the employee, which can vary by state, and may also be subject to terms of a Labor Agreement.
- Managers are responsible for consistently following the policy and all legal requirements.
- During a meeting that involves a disciplinary action, the employee should always be given an opportunity to give his/her point of view. Give the employee up to a week to write a response. The response should be maintained as part of the employee's record. The employee may request that a manager from a different department review the evaluation documentation and response.
- Reassignment or suspensions may be appropriate in the case of behavioral issues or severe conflict in which the employee has to be removed from a situation immediately, but termination isn't called for. Reassignment refers to retraining (rehabilitative). Suspension means some condition must be met before the suspension is over or the employee is terminated (punitive).
- Decisions to suspend or terminate an employee must be reviewed and approved by a member of the executive staff, or by the Board of Directors if the employee is on the executive staff.

Appendix A: Hiring Tracker

Funded: Money has been allotted to cover salary, benefits, equipment needs, etc.

Hire Goal: Number of people needed to fill positions.

Hiring Budget: Amount allocated for time commitments, job website fees, recruiting agency fees, job fair fees, etc.

Status: Job Description Complete; Position Posted; Interviewing; Intake Process in Progress; Completed.

Assigned To: Person responsible for ensuring process is completed.

Position	Funded (Y/N)	Hire Goal	Hiring Budget	Status	Assigned To	Comments
Chief Executive Officer		1	\$			
Chief Compliance Officer		1	\$			
Security Manager		1	\$			
Security Staff		5	\$			
Computing Security Manager		1 (part-time)	\$			
Inventory Control Manager		1	\$			
Inventory Control Staff		2	\$			
Record Keeping Manager		1	\$			
Chief Financial Officer		1	\$			
Sales Manager		1	\$			

Facilities Manager		1	\$			
Facilities Staff		2	\$			
Quality Assurance Officer		1	\$			
Quality Assurance Staff		1	\$			
Director of Production		1	\$			
			\$			
			\$			
			\$			
			\$			
Totals			\$			

Appendix B: Employee Intake Form Checklist

Employee Name: _____

Position: _____ Position Code: _____

Hire Date: _____

[Add or delete documents from the table according to the needs of your business and state and local regulations.]

Document	Original in File	Dept. to Receive Copy	Date Copy Sent	Person Responsible	Date Forwarded to Record Keeper
Job Description					
Resume					
Employment Application					
Authorization to Conduct Checks					
Background Check					
Reference Check Documentation					
Offer Letter					
Insurance Acceptance Form		Insurance Co.			
Computing Security					

Agreement*					
W-4		IRS			
Direct Deposit Form		Bank			
Personal Data Form					
Form I-9		IRS			
State Income Tax Form		State Income Tax Dept.			
Key/Key Card User Agreement*					
Driving Agreement (Drivers Only)					

*Available in the Security Plan

Appendix C: Training Matrix

Referenced Operating Plan (Column 3) C = Cultivation Plan D = Dispensary/Retail E = Employee Handbook H = Health & Safety Plan I = Inventory Control Plan O = Odor Control Plan Q = Quality Assurance Plan R = Record Keeping Plan S = Security Plan ST = Staffing & Training W = Waste Management Plan OT = Other	Key to Employee Types (Columns 4-11) 1 All Employees 2 Managers 3 Security Personnel 4 Cultivation Employees 5 Manufacturing Employees 6 Packaging and Labeling Employees 7 Transportation Employees 8 Dispensary/Retail Employees
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Training Topic	Brief Description	Plan	1	2	3	4	5	6	7	8
Effective Training Techniques	Instruction methods, student interaction, documentation and record keeping	ST		X						
Best Practices in Hiring	Writing job descriptions, preparing for an interview, regulations guiding interview questions	ST		X						
Evaluating Employees	Fair evaluations, preparing for a meeting, dealing with unsatisfactory performance	ST		X						
Reg-Federal Regulations	Information from the Wage and Hour Division of the U.S. Department of Labor; OSHA workplace injury documentation	OT	X							
Reg-State Regulations	[Add link to State Regulations]	OT	X							
Reg-Local Regulations	[Add link to Local Regulations]	OT	X							
Reg-Environmental Regulations	[Add link to Environmental Regulations]	OT	X							
Sensitive Records	Definition, storage requirements, access, computing security, retention policy	R, S	X							
Employee Orientation	Policies, pay, benefits, evaluations, suspension, disciplinary procedures	E	X							
Emergency Preparation	Good housekeeping, prevention, engineering controls, finding emergency numbers, practice and drills	S	X							
CPR/1st Aid (Encouraged for all)	Recognizing and responding to a variety of medical situations, when to call for help	S		X	X					
Emer-Armed Robbery	Appropriate response, silent alarm, noticing details, notifying management, contacting law enforcement	S	X							
Emer-Burglary	Avoiding affected areas, notifying management, contacting law enforcement	S	X							
Emer-Other Security Breaches	Types, risks, response procedures, notifying management, contacting emergency responders	S	X							
Emer-Medical Emergencies	Notifying person on staff with CPR/1st Aid training, notifying management, contacting emergency responders	S	X							
Emer-Fire Emergencies	Evacuation procedure, fire extinguishers, notifying management, contacting emergency responders	S	X							
Emer-Evacuation Procedure	Panic alarm, routes of egress, closing doors, safely maintaining secured areas,	S	X							

Safety Data Sheets (SDSs)	Globally Harmonized System, purpose, sections, hazard pictograms, hazard communication	H, C	X								
Container Labeling	SDSs, requirements, symbols, signal words, hazard statements	H	X								
Personal Protective Equipment (PPE)	Purpose, proper use, maintaining supplies, SDS information	H	X								
Chemical Spill Response	Incidental vs. non-incidental spills, PPE, clean up supplies, identifying potential risk to the environment	S or H	X								
Respiratory Protection	Proper equipment and use, respiratory risks, SDSs	H				X	X				
Protecting the Environment by Monitoring Water	Regulations, testing procedures, logs and record keeping, modifying pH	W				X	X				
Ladder Safety	Types of ladders, safe use, 3 points of contact	H	X								
Heat Stress	Risks, identifying symptoms, response procedure	H				X	X				
Poison Control	Sources of poisons, response procedure, posting of Poison Center phone #	H	X								
Safe Lifting	Body positioning, when to ask for help or use equipment, PPE	H	X								
Lockout System	Taking equipment out of service, responsibilities, lockout removal procedure	H									
Fire Extinguisher Use (Encouraged for all)	Locations, PASS, safety precautions	S		X	X						
Electrical Safety (as needed)	Risks, precautionary measures, PPE, advanced equipment lockout	H									
Basic Safety Rules	Housekeeping, obeying signs, training, following procedures, etc.	H	X								
Sanitation	Frequency, process, PPE	H	X								
Logs and Record Keeping	Purpose, types, document retrieval system, retention	R	X								
Equipment	Proper use, maintenance, inspections, repairs, lockout, contamination issues, logs	C, M, P				X	X	X			
Driving Safety (+ All Company Drivers)	Awareness, space between vehicles, driving in heavy traffic and inclement weather, what to do when an accident occurs	T								X	
Product Testing		Q				X	X				

Testing Sample Preparation	Purpose, selecting samples, record keeping	Q				X	X				
Bloodborne Pathogens	Response procedure, Hepatitis B	H	X								
Storage Requirements (temp, humidity, etc.)	Environmental conditions of finished flower and associated products and materials	C		X		X	X	X	X	X	
Processing	Processing stages, environmental conditions	C				X					
Methods of Cultivation	Plant stages, seeds vs. cloning, lighting requirements	C				X					
Plant Inspection	Daily checklist, logging plant and environmental conditions, pest management	C, Q				X					
Tracking Lots and Plants	Managing seed and cutting lots, applying UIDs, cross referencing to cultivation records	C				X					
Media	Media types and watering methods	C				X					
Cultivation Equipment	Types and purpose	C				X					
Fertilizers	Procedure for administering nutrients	C				X					
Seed Propagation		C				X					
Clone Propagation	Required attire, tool preparation, procedure, monitoring	C				X					
Vegetative Growth and Flowering	Definitions, light requirements, length	C				X					
Harvesting	Process description, cautions	C				X					
Job-specific Risks and Emergencies	Specific types of accidents that may occur, use of job risk analysis, managing changes in workflow or processes, updating procedures	M	X								
Good Manufacturing Practices	Risk analysis and management, quality assurance, safety, existing guidelines	M					X	X			
Working with Solvents	SDSs, potential health hazards, evaluating exposure, engineering controls, PPE, containers and labeling, reuse	M					X				
Extraction Methods	Types of extracts, chemistry, working with heating elements, working with batches, inventory control, scales and other equipment, workflow, safety, sanitation, storage	M					X				

Mixing	Working with batches, inventory control, ingredients, scales and mixing equipment, safety, sanitation, storage	M					X			
Infusion Methods	Working with heating elements, working with batches, inventory control, ingredients, scales and infusion equipment, safety, sanitation, storage	M					X			
In-process Sampling and Controls	Selecting a sample, preparing a sample, homogenization, workflow, inventory control, procedures for failed samples, record keeping	M					X			
Food/Ingredient Safety and Storage	Perishables, variations in shelf life, effects of heat, light, and oxygen	M					X	X		
Reuse of Materials	Working with batches, inventory control	M					X			
Equipment Inspection	Risks of working with equipment, maintenance procedures, maintenance and repair logs, sanitation, record keeping	CMP				X	X	X		
Contamination Control	Routes of contamination, sanitation, PPE and other engineering controls,	CMPD				X	X	X		X
Expirations/Time Limits	Effects of heat, light, and oxygen, determining expiration dates, managing expired products, inventory control	Q		X		X	X	X		X
Batch Management	Understanding batches, when/if batches can be mixed, inventory control issues, logs and record keeping	I				X	X			
UID Issuance and Control	Procuring and secure storage of UID tags	I		X		X	X	X		
Label Design	Avoiding appealing to children, label requirements, proofing	P						X		
Packaging and Labeling Procedures	Ensuring accurate and complete label information in accordance with state law	Q						X		
Quality Control	Responsibilities, sampling and testing, adverse events and recalls, changes to procedures	Q	X							
Interacting with Regulators		S		X	X					
Interacting with Law Enforcement		S		X	X					
Point of Sale System	Software, security, integration into inventory control system, scales	D								X
Returns, Complaints, Adverse Events, and Recalls	Who to notify, response procedures, logs and record keeping	Q		X						X
Sales Techniques	Interacting with and educating customers	D								X

Managing Patient Data (if applicable)	Patient privacy, HIPAA regulations, record storage, retention, limiting access	D										X
Waste Management	Regulations, collection and storage, inventory control, disposal	W	X									
Product Side Effects/Consumer Safety	Intoxicating effects, risks, laws	D										X
Product Dosage, Strengths, and Metabolism	Differences in product types, CBD vs. THC	D or M										X
Drug Interactions	Contraindications, health conditions not compatible with cannabinoid use	D										X
Methods of Ingestion	Types of products, pros and cons	D										X
Strain Characteristics and Effects		C										X
Recognizing Acute Intoxication	Signs of distress, refusing to sell to a customer, when to notify a manager	D										X
Results of Studies in Cannabis Use	Periodic updates based on literature reviews	D										X
Paraphernalia Use	Proper use of equipment, maintenance, pros and cons	D										X
Reducing Impacts on the Community		H	X									
Legal Possession Quantities and Associated Laws		D										X
Accessing Procedures	Where to find most recent versions of procedures	Q	X									
Ensuring Integrity of Shipments	Inventory control, environmental controls, sealing cases and containers	T									X	
Shipment Manifests	Requirements, responsibilities, producing a manifest, confirming manifest accuracy	T									X	
Transportation Route Selection	Route considerations, safety, traffic, obeying laws, procedure for deviating from planned route	T									X	
Transportation Procedures	Staffing requirements, responsibilities, vehicle requirements, security, delivery at customer facility, reporting problems	T									X	
Cleaning and Maintaining Display Areas		D										X
Management of Accidentally Opened Product Packaging		W					X	X	X	X	X	X
Packaging of Sold Products		D										X
Preventing Access to Children		D								X		X

Odor Control	Definitions, mitigation, procedures, physical measures and equipment, system maintenance	O					X	X			
Workplace Violence Policy	Expectations, reporting new or potential incidents, disciplinary action	S	X								

Appendix D: Notice of Needed Improvements

Employee Information

Name: _____

Date: _____

Employee ID: _____

Position: _____

Manager: _____

Warning Status

____ First Warning

____ Second Warning

____ Final Warning

Area of Needed Improvement

____ Lateness/Leaving Early

____ Low Productivity

____ Skipped Shift

____ Procedure Violation

____ Inappropriate Behavior

____ Other: _____

Description of Issue, including date and time of a specific incident if applicable:

Needed Improvements:

Acknowledgements

By signing this form, I verify that I understand of the types of improvements needed as specified above. I also understand that making these improvements is necessary to avoid possible disciplinary action. If I do not agree with the information documented in this form, I may write a reply and have it placed in my file attached to this form and have the information reviewed by a second evaluator.

Employee Signature: _____ Date: _____

Evaluator Signature: _____ Date: _____

Witness if employee does not sign: _____ Date: _____

Appendix E: Personal Vehicle Driving Agreement

Employees may be requested to operate their owned, leased, or rented vehicle to conduct Jolly Green Inc business.

Jolly Green Inc does not assume any liability for bodily injuries or property damage the vehicle owner, driver, or passengers may become personally obligated to pay arising out of such operation. When operating your personal vehicle on behalf of [Company], the following policies must be followed:

- The driver must be determined to meet all Jolly Green Inc driver qualification standards described in this agreement before being permitted to operate a personal vehicle on Jolly Green Inc business. Failure to continue to meet these qualification standards will result in revocation of the Employee's driving responsibilities.
- The vehicle being operated must have a valid registration, and proof of registration must be kept in the vehicle. Employee drivers must possess a current and valid driver's license on their person at all times while operating the vehicle.
- Automobile insurance meeting the legal minimum requirements of the vehicle's state of registry must be maintained on the vehicle being used, and a valid insurance identification card must be kept in the vehicle. Proof of such insurance must be provided to Jolly Green Inc when the driver is initially added to Jolly Green Inc's driver list and whenever requested thereafter.

- Jolly Green Inc does not specify and assumes no responsibility for any other coverage Employees carry on the vehicles used, but encourages those operating vehicles on behalf of Jolly Green Inc on a regular basis to maintain limits of at least \$100,000 each person/\$200,000 each occurrence for bodily injury and \$100,000 property damage, or a combined single liability (CSL) limit of \$300,000, plus uninsured motorist (UM) and underinsured motorist (UIM) coverage.
- Vehicles should be maintained so as to permit reliable and safe operation. The vehicle owner/driver is responsible for all maintenance and associated costs.
- Seatbelts and other required safety restraints must be used at all times.
- All traffic laws must be obeyed. Jolly Green Inc is not responsible for and will not reimburse Employees for any moving or non-moving violations received as a result of operating a vehicle on behalf of the organization.
- Vehicles may not be operated while the driver is under the influence of alcohol or any other controlled substance, including any prescription or over-the-counter medications that may affect driving ability.

Reporting Requirements

In order to ensure that drivers maintain compliance with the company driver qualification standard, drivers are required to report all moving violations and at-fault accidents, or drivers' license status changes (suspension, revocation, new license, etc.) to a supervisor within 72 hours of conviction, determination, or status change effective date.

Accidents Involving Use of Personal Vehicles

If you are involved in an accident in your personal or rented vehicle while traveling on business, a claim should be filed with your personal automobile insurance company, as that policy will provide primary coverage. However, the accident should still be reported to your supervisor.

Violations of Policy

Failure to comply with any of these policies may result in suspension of driving responsibilities on behalf of Jolly Green Inc.

I have reviewed and received a copy of this Jolly Green Inc Vehicle and Driving Agreement. I agree to abide by all policies and procedures to ensure safety of myself and the general public, when driving to conduct business on behalf of Jolly Green Inc.

(Print your first and last name)

Signature

Date

Diversity Plan
Jolly Green Inc
60 Franklin St Winchendon MA 01475

About us:

Jolly Green was established in 2018 for the purpose of adult use cannabis cultivation and is located at 60 Franklin St. Winchendon Massachusetts, and applying for a tier one cultivation license. Furthermore, within a two-year time frame we are planning on applying for a tier two license for a 2nd location at 246 Suffolk Lane at Gardner Massachusetts.

Through the legalization of cannabis this has created an opportunity for many small businesses to come into existence. In doing so establishing well-paying jobs within Massachusetts in the cannabis industry. Currently Jolly Green is startup owner operated company and intends on creating jobs and supporting businesses from areas negatively impacted by the legalization of cannabis.

I feel we have a moral and ethical obligation to society. Thus, Jolly Green will promote equity among the following demographics, minorities, women, veterans, people with disabilities and LGBTQ+. This will be done by the following Diversity plan that is outlined.

Diversity Plan Goals:

Jolly Green will Promote equity in its internal business operations. By increasing the number of individuals falling into the above-listed demographics working in our establishment and providing tools to ensure their success. Our plan is to hire 4 individuals per year from the above listed demographics.

- Goal Example, Jolly Green shall hire the following:
 1. 30% veterans
 2. 30% women
 3. 20% minorities

4. 10% persons with disabilities
5. 10% LGBTQ+

Jolly Green will promote equity in its external business operations. By using 6 or more vendors owned by individuals falling into the listed demographics. Women, veterans, people with disabilities and LGBTQ+.

- Goal Example, Jolly Green shall hire the following:
 1. 30% veterans
 2. 30% women
 3. 20% minorities
 4. 10% persons with disabilities
 5. 10% LGBTQ+

Programs:

Promoting equity within Jolly Green internal business operations:

- Jolly green will promote equity among employees by creating an equity hiring process. This process will include Jolly Green posting quarterly advertisements in the local newspaper, **The Gardner News**, stating that Jolly Green is specifically looking for women, minorities, or persons with disabilities, LGBTQ+ to work for the establishment.

Promoting equity within Jolly Green external business operations:

- Jolly Green will create economic opportunity for diverse individuals. The State Massachusetts offers a program through the Supplier Diversity Office that Jolly Green will use. By utilizing this tool, we will research and establish business relationships with diverse businesses owners in Massachusetts. Jolly Green intends on hiring 6 or more of its vendors from the following listed demographics. Women, veterans, people with disabilities and LGBTQ+.

Measurements and accountability:

- **Program #1.**

Employee equity program, Jolly Green compliance management will review and perform annual audit to ensure progress towards diversity goals. Jolly Green will post quarterly advertisements in the local newspaper, **The Gardner News**, stating that Jolly Green is specifically looking for women, minorities, or persons with disabilities, LGBTQ+ to work for the establishment. Jolly Green intends on employing 4# or more diverse individuals over the first year. Jolly Green will count the number of individuals hired to ensure that 4# individuals hired fall within this goal. Jolly Green will audit and document the progress or success of the program upon renewal of the license (one year from provisional, and each year thereafter).

- **Program #2**

Vendor and contractor equity program, Jolly Green compliance management will review and perform audit one time a year to ensure progress towards vendor and contractor diversity goals. Jolly Green will use the Massachusetts Supplier Diversity Office program to procure vendors and contracts with diverse business owners. Jolly Green intends on hiring and contracting with 6 or more companies utilizing this program. Jolly Green will count the number of vendors hired to ensure that 6# hired fall within this goal. Jolly Green will audit and document the progress or success of the program upon renewal of the license (one year from provisional, and each year thereafter).

Jolly Green Inc required acknowledgements:

Jolly Green Inc 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;

Any actions taken, or programs instituted, by Jolly Green Inc will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

Energy Compliance Plan

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Addendum

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Introduction

The purpose of this Environmental Plan is to ensure that Jolly Green Inc operates in a manner that minimally impacts the environment. Indoor cannabis production is known to be energy intensive, but several design, equipment and process choices can be made to strike the best balance between the company's economic success and the social and environmental well being of workers, neighbors, consumers and natural resources.

This plan describes standards and steps that will be taken by Jolly Green Inc minimize carbon footprint and environmental impact while also maximizing energy efficiency, mitigating odors, conserving water, and ensuring high quality, high yielding cannabis production.

It is the responsibility of the Kyle Higgins to ensure that environmental and sustainability procedures are followed by all personnel. It is the responsibility of the Compliance Officer to monitor implementation of this procedure, report necessary corrections and identify options for using renewable energy.

The provisions of this procedure in accordance with the requirements of local, state and federal law and regulations. The Kyle Higgins will update this Plan, as needed, to comply with evolving laws and regulations.

Minimizing Carbon Footprint

Growing cannabis, particularly in colder climates, can lead to high levels of greenhouse gas emissions mainly because of the high electrical usage, which is supplied by utilities burning fossil fuels to supply the energy. To minimize the amount of carbon compounds that cannabis production and the operation of a business in general could produce, Jolly Green Inc will:

- Use LED lighting for all stages of plant growth

**Addendum — Operating Policies and Procedures (Cultivation Plan)
related to the CCC regulations**

1. Jolly Green soil shall meet the federal standards identified by the Commission in accordance with 935 CMR 500.120.
2. Jolly Green selling or otherwise transferring marijuana to another establishment shall provide documentation of its compliance with the testing requirements in accord with 935 CMR 500.160.
3. Jolly Green shall 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 final license in accord with 935 CMR 500.103(2).
4. Jolly Green shall adopt and use additional best management practices as determined by the Commission 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.
5. Jolly Green shall upon license renewal include a report of the energy and water usage over the last 12-month period preceding the date of the application in accord with 935 500.120.
6. Jolly Green prior to the final license, shall demonstrate compliance with 935 CMR 500.120(11), by submitting an energy compliance letter prepared by MA. Licensed professional engineer or a MA. licensed registered architect with supporting documentation, together with submission of building plans in accord with 935 500.103.
7. Jolly Green horticulture lighting power density shall not exceed 36 watts per square foot, except for a Tier 1 and Tier 2 which must not exceed 50 watts per square foot in accord with 935 CMR 500.120(11).
8. Jolly Green facility horticultural being used shall be listed on the current design lights consortium solid-state horticultural lighting products list (OR) or similar list approved by the

commission as of the date of the license application and lighting photosynthetic photon efficacy

(PPE) is at least 15% above the minimum QPL threshold rounded up to the nearest .1 umolil as

per 935 CMR 500.120(11).

9. If Jolly Green seeks to use horticultural lighting not included on the QPL or similar list approved by the Commission. Jolly Green shall seek a waiver per 935 CMR 500.850 and will provide documentation of a third-party certification of the energy efficiency features of the proposed lighting. Regardless of compliance path Jolly Green shall provide third party safety certification by an OSHA NRTL or SCC recognized body, which shall certify that the products

meet a set of safety requirements and standards deemed applicable to horticultural lighting products by that safety organization in accord with 935 CMR 500.120(11)

- Purchase electric vehicles for company use when practical to do so.
- Incentivize employees to commute to work via public transit, bike or carpool
- Provide a secured bike storage location on the premises
- Have a company bike for employees to use to run errands or during breaks
- Use teleconferencing in place of travel for meetings when possible
- Educated staff through online and in-person courses to minimize energy usage
- Install energy-efficient air conditioning systems (see below for more detail)

Minimizing Environmental Impact

Jolly Green Inc plans to reduce our environmental impact by starting at the very beginning - building design. We will coordinate during facility planning with National Grid to ensure sustainable energy use and energy conservation.

Building Design

Green Materials

The first stage of environmental responsibility comes with the design of the building. Green materials will be used whenever feasible, such as bamboo or lumber from fast-growing, renewable tree types. Walls and floors will be coated with low-VOC environmentally friendly paints and coatings. A general contractor with experience in Green Building Standards will be hired to advise on additional environmentally responsible construction materials and methods.

High Insulation Value

Building walls will have R-17 or better insulation values so that air conditioning will stay contained in the rooms where it's needed and outside temperature conditions will not significantly impact indoor climate conditions. Windows in administrative areas will be double-paned insulated windows.

Minimal Air Exchanges

The building will be tightly designed to allow no leaks, either for cool air to escape, or for pests and mold spores to enter. Due to the use of supplemental Co2 in plant rooms, air exchanges with outdoor air are not necessary, but during the winter months, filtered outdoor air intake can serve as a low-cost environmentally friendly source of cooling. The climate control system for the plant production rooms will be designed to switch from electric air conditioning to filtered cold-air intake between the months of November and March. Warm air from plant rooms can be exhausted into hallways and administrative areas to heat those areas in lieu of electric heating during the winter. All circulating air in the facility will be filtered and supplemented as needed to make it suitable for humans and plants.

Odor Control

Although cannabis odor from living and harvested plants is not considered unhealthy to breathe, it is often considered an environmental nuisance by neighbors, and thus will be controlled in

order to minimize community and environmental impact. Air exhausted out of the facility will be treated with carbon filtration and ozone to ensure all odors are neutralized. Further, the outer corridor of the facility will be designed with negative air pressure. This means that opening doors or windows will not emit odors to the outdoors because the outside air will be *pulled* into any openings in the building by high-power ceiling mounted outtake fans around the inner perimeter of the building. These fans are fitted with cannabis-specific carbon filters, so once the air moves into the facility, whatever odors it picks up will be neutralized as it is being exhausted. This is a standard practice in the cannabis industry in the US.

UVC and HEPA filtration for Admin and LAA functions

Inside the Limited Access Areas, air is heavily circulated through a central air treatment system that dries the air, injects Co₂, cools the air to a predetermined set point and kills any microbial spores using high-exposure UVC lighting. Plants absorb the Co₂ as part of their growth process, meaning there's no net negative carbon impact from using Co₂ in a plant production facility.

Energy-Efficient Fixtures

The building will be outfitted in the latest energy-saving fixtures, including self-closing weather-stripped doors, motion sensing lights in hallways, offices, bathrooms and common areas, motion sensing toilets and sinks, Energy Star appliances and forced-air hand dryers in bathrooms. Energy-efficient LED lights will be used for all lit signs, office and security lighting.

Wiring and Voltage

During the build-out process, when electrical infrastructure is being installed, 277v wiring will be used to power the plant light subpanels. This is the most energy efficient voltage and wiring choice and works with all LED horticultural fixtures. Higher voltage equipment will be used whenever safely possible to save energy and improve efficiency.

Electrical Time of Use

A Time of Use (TOU) meter will be ordered from the utility company, which offers lower costs per kWh between the hours of 11 pm and 4pm. During this time span of lower electrical costs, all reasonable plant production and extraction processes will be heavily used so as to minimize the total amount of daily electrical costs to the company. All items left on and plugged in will operate through digital timers if there are predictable periods during each 24-hour cycle when they need not be using power.

Office/Facility Policies

A segment of monthly personnel meetings will be dedicated to eco-friendly ideas and suggestions for energy-efficient improvement. All personnel will be trained on and encouraged to enact all of the following energy-saving policies:

- Double-sided printing
- Paper and cardboard recycling

- Food waste composting
- Minimizing paper processes in favor of backed up electronic document systems.
- Reusing washable cups, plates and utensils
- Using the provided filtered drinking water system (no bottled water)
- Use of eco-friendly supplies and packaging in all supply orders
- Using sleep mode properly on computers instead of screensavers
- Turning off all unnecessary equipment when not in use
- Using mobile devices or projectors to distribute materials during meetings
- Purchase a multifunction printer rather than separate machines
- Use the ink-saving mode on printers

The executive staff will also:

- Screen suppliers for positive social and environmental impacts (certifications such as B Corp, Green Business, or Fair Trade)
- Ask the Facilities Manager to check all plugged-in equipment to determine if it is still needed for daily operations and unplug/remove any equipment that is not currently in use for both administrative and production areas of the facility

Waste Minimization

Part of environmental responsibility is waste minimization. Jolly Green Inc will train all employees in waste minimization techniques, which will include at a minimum:

- Composting of food, cardboard and cannabis materials (described in detail in Exhibit A)
- Recycling of all possible items (described in detail in Exhibit A)
- Using rechargeable batteries when possible and retesting batteries assumed to be dead before discarding
- Reuse of containers, media, packaging and equipment parts where possible
- Purchasing of supplies with minimal or recyclable packaging
- Donate used items instead of throwing them away
- Reuse packing materials or donate them to a neighboring business who can use them

Minimizing Resource Needs for the Production of Cannabis High Performance Cultivation Techniques

A significant but often overlooked component of energy efficiency in cannabis cultivation facilities is yield enhancement. If a facility is on the low end of industry-standard yields, such as 1lb per light, per harvest of dried cannabis, they are effectively using twice as much energy per unit of output as a facility yielding 2 lbs per light. For this reason, Jolly Green Inc is focusing just as much attention on the factors involved with achieving large yields than on the energy usage of the facility's basic infrastructure and equipment.

We know from our cannabis cultivation advisors that maintaining the ideal environmental needs of the plants is critical to achieving maximum yields from plants. Plants must be kept in ideal conditions at all times throughout their growth process in order to unfold into full-sized flowers over the course of their roughly 14-week life from clone to harvest.

These critical plant factors are temperature, humidity, vapor pressure deficit management, fresh/clean air circulation, carbon dioxide, a balanced mineral regimen, oxygen to the roots, proper pruning and attenuation of lighting. Industry-standard yields are —1.25lbs per light per harvest, but yields can be double that under ideal conditions and treatment. Our experts have consistently been able to yield 1.75-2.2 lbs. per light per harvest in other facilities, which on its own increases our total facility energy efficiency, over other average cultivators, by 40-75%. This is taking into account that our cultivar choices are also made partly on the basis of genetic yield potential and overall vigor.

Conversely, strict biosecurity protocols must be maintained in order for optimal plant production conditions not to be compromised. When, for example, a pest or mold outbreak is allowed to happen, quality and yield will go down while labor and pesticide input will go up, clearly having a significant negative effect on operational efficiency and product quality and value, which leads to excess energy usage per unit of output. Jolly Green Inc has as one of its highest priorities the prevention of pest and mold problems through good building design and cultural practices.

Data Logging for Optimizing Usage

Data collection, logging and analysis is an integral part of optimizing energy and resource use at a cannabis production facility. This means using sensors and meters to track environmental conditions and plant inputs on a minute-to-minute basis on a central computer system. The Kyle Higgins will analyze this data each week to find times of the day, for example, where electrical equipment might be running more intensively or for a longer period than necessary in order to meet optimum plant cultivation requirements. Adjustments aiming towards minimizing energy usage will regularly be made, based on this gathered information.

The Kyle Higgins will collect, archive and analyze monthly utility bills to identify further areas of potential energy and resource savings.

Alternative Energy Plans Renewable Energy

While Jolly Green Inc will rely primarily on electrical service from the local utility company to power its equipment and facility, a plan is in place to add solar panels over time to offset the burning of fossil fuels for plant cultivation. By year 5, we expect to cover 25% of our total electrical usage with renewable energy.

The company will also make all reasonable efforts to identify and utilize options for purchasing renewable energy certificates or other carbon off-set options for routine operations. The Kyle Higgins will report to the executive team regarding options for renewable energy and progress on utilization of renewable energy on a twice-yearly basis.

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Water Reclamation/Filtration

Jolly Green Inc will measure runoff from watering events and report this volume in our water usage plan. On average, watering events will have no more than 20% of runoff of water.

Drain pipes from air conditioners and dehumidifiers will be cleaned every 3 months to ensure that reclaimed condensate water is sufficiently clean for reuse. All of the condensate recovery drain pipes will merge into a central reclamation tank for daily plant watering needs. Excess runoff and other wastewater will also be captured. If necessary, this water will be carbon filtered and/or sterilized before being reapplied to plants. Using this water for plant irrigation represents a 90+% savings in total water usage for the cultivation sections of the facility. Tap water will only be needed for plants on days when extra flushing or media drenching is necessary to apply pest prevention substances or cleanse the media of excess mineral content.

Drip Irrigation System

An automated drip irrigation will be used to minimize water waste. This is a method by which the water from the main central irrigation tank is served in small metered doses to individual plants several times per day. This method solves the problem of large amounts of runoff that could be considered environmentally hazardous if it were discharged either into the ground or in high concentrations to the wastewater treatment facility.

Water Usage Assurances

- Water Fixtures - All plumbing and irrigation fixtures will be maintained in good working order and promptly replaced or repaired, as needed. Fixtures are in need of replacement or repair if they drip or leak when turned off.
- No water hose, faucet or spigot shall be allowed to flow freely when not in use. All personnel will ensure that fixtures are closed or off when not in use.
- Spill and Waste Mitigation —All personnel will exercise due diligence in preventing accidental spills, discharges or waste of water.
- Waste water and nutrient water discharge will all be disposed of in accordance with local, state and federal law.
- Pursuant to MA. Plumbing Code, there will be no cross connections between the potable and wastewater lines.

Equipment and Water Efficiency HVAC/Environmental Controls

LED lighting uses 35-40% less energy than it's HPS (high pressure sodium) legacy equivalent. Lower wattage equates directly to lower heat production, meaning that the air conditioning requirement for each grow room is also 35-40% lower than it would be using other lighting types. This represents a significant savings in electrical usage for the entire facility.

In choosing specific brands and technologies of equipment for climate control in cannabis production, several different critical factors must come into play. The equipment must first and foremost ensure the maintenance of ideal set points for temperature and humidity. Second, the equipment must not, by virtue of its mechanical design, risk the health of the plants through the spreading of mold or mildew through the facility. Mini-split air conditioning units, for example, are known to be energy efficient, but they are virtually impossible to clean, have a high failure rate, and do not maintain tight temperature and humidity set points. Thus, the energy savings they offer is not worth all of the other costs.

More modern technologies such as the Thermal Zone integrated DX system, designed specifically for indoor cannabis rooms, operate as efficiently as ductless split systems, but do not present any of the risks associated with ductless split systems. The up-front cost is notably higher with an integrated specialty design, but the energy efficiency and reliability are also considerably above that provided by ductless split systems.

Lighting

Jolly Green Inc has chosen SpecGrade LED Famurs and Kingled for the vegetative and flowering cultivation. In order to save more energy, thereby reducing carbon footprint, a graduated system of increasing plant lighting intensity by 100 micromoles/joule/week will be implemented, such that the full amount of light needed for vegetative plants will graduate up one level for each of 3 weeks, and similarly, the full light for flowering will not be reached until week 5 of 9 total flowering weeks. Given that lower light levels translate to lower air conditioning use (because of less heat production), this graduated system of lighting increases represents an energy savings in the plant cultivation rooms of an estimated 25-30% in comparison to average cannabis cultivation facilities that go to full light intensity as quickly as possible.

Regular Servicing and Sanitation

All climate control and lighting equipment will be tested, serviced and cleaned on a monthly basis, including filter changes. Dirty, unserviced equipment uses more energy and risks ideal set points going out of range. No cleaning chemicals will be sprayed into air handling equipment since condensate water is being reclaimed for plant use. At the time of servicing, the condition of the equipment will be assessed to ensure that everything is operating at maximum efficiency and that nothing is leaking or appears to be at risk.

Research and Process Reviews

The Kyle Higgins will be responsible for conducting periodic research into improved technologies that could optimize any aspect of operations. Processes will also be regularly reviewed to optimize the amount of human energy that goes into producing ready-for-sale cannabis products. The Kyle Higgins will also:

- Set goals and regularly report to all staff and customers on progress

- Designate a waste reduction and recycling coordinator who will regularly report on progress
- Encourage employees to regularly make suggestions or forward articles they have read about making businesses more green

