



Massachusetts Cannabis Control Commission

Marijuana Product Manufacturer

General Information:

License Number: MP282234
Original Issued Date: 05/19/2023
Issued Date: 05/19/2023
Expiration Date: 05/19/2024

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Jolly Green INC

Phone Number: 978-410-7736 Email Address: jlygrn1@gmail.com

Business Address 1: 246 Suffolk Lane Business Address 2:

Business City: Gardner Business State: MA Business Zip Code: 01440

Mailing Address 1: 246 Suffolk Lane Mailing Address 2:

Mailing City: Gardner Mailing State: MA Mailing Zip Code: 01440

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

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

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 100 Percentage Of Control: 100

Role: Executive / Officer Other Role:

First Name: 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: Mix

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

Close Associates or Member 1

First Name: Kyle

Last Name: Higgins

Suffix:

Describe the nature of the relationship this person has with the Marijuana Establishment: I own Jolly Green Inc and are the primary manager.

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Kyle

Last Name: Higgins

Suffix:

Marijuana Establishment Name: Jolly Green Inc

Business Type: Marijuana Cultivator

Marijuana Establishment City: Gardner

Marijuana Establishment State: MA

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: 13000

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

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan to Remain Compliant with Local Zoning	Plan to remain compliant in the City of Gardner.pdf	pdf	632caa6576c66600080c3348	09/22/2022
Certification of Host Community Agreement	HCA-signed.pdf	pdf	639b4ca852253500084978d8	12/15/2022
Certification of Host Community Agreement	GardnerHostCummmunityAgreement.pdf	pdf	639b4f6752253500084982ed	12/15/2022
Community Outreach Meeting Documentation	Attestation Form 2:9:23.pdf	pdf	63e51be4a8e27500071f7d11	02/09/2023

Total amount of financial benefits accruing to the municipality as a result of the host community agreement. If the total amount is

zero, please enter zero and provide documentation explaining this number.: \$

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	RevisedPositive Impact2:10:23.pdf	pdf	63e63fc6a8e2750007209c49	02/10/2023

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Executive / Officer

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
Bylaws	Bylaws Jolly Green.pdf	pdf	632cb8572bb69400084fa9cf	09/22/2022
Articles of Organization	Bylaws Jolly Green.pdf	pdf	632cb8652bb69400084fa9e9	09/22/2022
Secretary of Commonwealth - Certificate of Good Standing	SECSTATENOV.pdf	pdf	63b2f250a0fd020008ed6f16	01/02/2023
Department of Revenue - Certificate of Good standing	MASTAXNOV.pdf	pdf	63b2f25f5225350008592783	01/02/2023
Department of Unemployment Assistance - Certificate of Good standing	DeptUNNOV.pdf	pdf	63b2f26e5225350008592797	01/02/2023

No documents uploaded

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	BusinessPlanrevised2022.pdf	pdf	632cba7e2bb69400084faf37	09/22/2022
Plan for Liability Insurance	PlanToObtainLiabilityInsurance.pdf	pdf	632cbcab2bb69400084fb725	09/22/2022
Proposed Timeline	JG Manufacturing proposed timeline.pdf	pdf	63dab351a8e275000717155a	02/01/2023

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Security plan	security_plan_-_Diversion .pdf	pdf	632cc2022bb69400084fd7c5	09/22/2022
Storage of marijuana	distribution_transportation updated 3-26.pdf	pdf	632cc33376c66600080c8ef7	09/22/2022
Transportation of marijuana	distribution_transportation updated 3-26.pdf	pdf	632cc34476c66600080c8f56	09/22/2022
Diversity plan	DiversitySuffolkRevised9-14-22.pdf	pdf	632cc3ba76c66600080c915c	09/22/2022
Security plan	security_plan_-_Diversion .pdf	pdf	639a34dd522535000848ae23	12/14/2022
Prevention of diversion	security_plan_-_Diversion .pdf	pdf	639a34f2a0fd020008dd061a	12/14/2022
Record Keeping procedures	record_keeping_plan_maintenance procedures.pdf	pdf	639a3525522535000848aec6	12/14/2022
Maintaining of financial records	record_keeping_plan_maintenance procedures.pdf	pdf	639a3545522535000848aeec	12/14/2022
Personnel policies including background checks	staffing_and_training_plan_3-23-20.pdf	pdf	639a3a81a0fd020008dd0ca9	12/14/2022
Qualifications and training	staffing_and_training_plan_updated 3-26-19.pdf	pdf	639a3aaa522535000848b366	12/14/2022
Quality control and testing	quality_assurance_plan_3:23:20.pdf	pdf	639a3ad4522535000848b37e	12/14/2022
Sample of unique identifying marks used for branding	#2Hisierra - Jolly Green Half - D - SUP-W - 171760 v3 copy.pdf	pdf	639a3b41a0fd020008dd0d89	12/14/2022
Safety Plan for Manufacturing	health safety Man plan.pdf	pdf	63b30b50a0fd020008ed92b0	01/02/2023
Plan to Obtain Marijuana	Plan to obtain cannabis.pdf	pdf	63b3166da0fd020008ed9b0a	01/02/2023
Dispensing procedures	Extraction plan.pdf	pdf	63b3174d52253500085958f0	01/02/2023
Qualifications and training	Extraction plan.pdf	pdf	63b3196d5225350008595c5b	01/02/2023
Inventory procedures	Inventory control plan02:01:23.pdf	pdf	63dabfcda8e27500071729f5	02/01/2023
Restricting Access to age 21 and older	Security-plan-21 or older 02:01:23.pdf	pdf	63dad601a6f09f00086785f2	02/01/2023
Types of products Manufactured.	manufacturing plan products#1.pdf	pdf	63daefeda8e27500071760e1	02/01/2023
Method used to produce products	manufacturing production methods#.pdf	pdf	63daf809a8e275000717680d	02/01/2023
Energy Compliance Plan	Energy compliance PlanProductMan.pdf	pdf	63e649bc35eb06000886dbf3	02/10/2023

ATTESTATIONS

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

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

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

Notification:

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification:

COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

PRODUCT MANUFACTURER SPECIFIC REQUIREMENTS

No records found

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

Plan to remain compliant in the City of Gardner

Jolly Green Inc of 246 Suffolk Lane Gardner MA 01440 MC283508 plans to remain compliant. With all local health, building and special permits. The following plan addresses these areas.

1. Special permit City of Gardner. This plan includes site plan approval.
2. Building permit
3. Health department and local licensing approvals.

Special permit:

On June 14, 2022 Jolly Green Inc was issued a special permit from the City of Gardner MA to cultivate cannabis at 246 Suffolk Lane. Upon a 30-day grace period the special permit was recorded with the Worcester county of deeds.

Building permit:

On July 15, 2022 the Gardner building department issued a building permit for the upfit of 246 Suffolk Lane to be converted into a cannabis cultivation facility.

Health department and local licensing approvals.

At this point Jolly Green has obtained local licensing approvals. In regard to the health department approvals we will be scheduling a meeting with the health department to review any concerns or request after the cannabis cultivation buildout is complete. We are anticipating a projected date of 12/20/2022.

On 12/28/2022 the plan to remain compliant with the City of Gardner's, special permit and local licensing/permits will be reviewed for updates and completion dates. Any changes will be made at this time.



Host Community Agreement Certification Form

Instructions

Certification of a host community agreement is a requirement of the application to become a Marijuana Establishment (ME) and Medical Marijuana Treatment Center (MTC). Applicants must complete items 1-3. The contracting authority for the municipality must complete items 4-8. Failure to complete a section will result in the application not being deemed complete. This form should be completed and uploaded into your application. Please note that submission of information that is "misleading, incorrect, false, or fraudulent" is grounds for denial of an application for a license pursuant to 935 CMR 500.400(2) and 501.400(2).

Certification

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

1. Name of applicant:

Tolly Green Inc

2. Name of applicant's authorized representative:

Kyle Higgins

3. Signature of applicant's authorized representative:

Kyle Higgins

4. Name of municipality:

City of Gardner

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

Michael Nicholson



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



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

tbeauregard@gardner-ma.gov

8. Host community agreement execution date:

10/14/22

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

The Host Community Agreement (the “Agreement”) is entered into this 14th day of October, 2022 (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 manufacturing 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 manufacturing 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 Manufacturing 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 – This obligation is addressed in the Company's Cultivation Host Community Agreement.
 - 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 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.

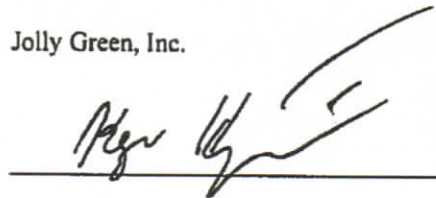
The following signatures indicate that the parties hereby agree to the terms set forth in this Host Community Agreement as per the date set forth on page 1 of this agreement.

City of Gardner



Michael J. Nicholson
Mayor

Jolly Green, Inc.



Kyle Higgins
President

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): 12-07-2022
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: 11-04-2022
- b. Name of publication: Gardner Newspaper

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: 11-01-2022

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: 11-3-22

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:



Attachment E 4

LOCALiQ NEW ENGLAND

PO Box 631210 Cincinnati, OH 45263-1210

PROOF OF PUBLICATION

Kyle Higgins
Kyle Higgins
246 Suffolk LN
Gardner MA 01440-1760

STATE OF MASSACHUSETTS, COUNTY OF WORCESTER

The Gardner News, a newspaper distributed in the county of Worcester, published in the City of Gardner, County of Worcester, State of Massachusetts printed and published and personal knowledge of the facts herein state and that the notice hereto annexed was Published in said newspapers in the issues dated on:

11/04/2022

and that the fees charged are legal.
Sworn to and subscribed before on 11/04/2022

Legal Clerk

Notary, State of WI, County of Brown

My commission expires

Publication Cost: \$76.27
Order No: 7982996
Customer No: 883556
PO #:

of Copies:
1

THIS IS NOT AN INVOICE!

Please do not use this form for payment remittance.

CITY OF GARDNER LEGAL NOTICE Community Outreach Meeting

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana product manufacturing is scheduled for December 7, 2022 at 5:00 pm at 246 Suffolk Lane Gardner MA 01440. The proposed Marijuana product manufacturing 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) 410-7736

NICOLE JACOBS
Notary Public
State of Wisconsin

Ethiopia, Tigray agree to end fighting

Millions have been displaced by conflict

Mogamstel Magome and Cara Anne
ASSOCIATED PRESS

PRETORIA, South Africa — Ethiopia's warring sides agreed Wednesday to a permanent cessation of hostilities in a 2-year conflict whose victims could be counted in the hundreds of thousands, but enormous challenges lie ahead, including getting all parties to lay down arms or withdraw.

African Union envoy Olusegun Obasanjo, in the first briefing on the peace talks in South Africa, said Ethiopia's government and Tigray authorities agreed on "orderly, smooth and coordinated disarmament." Other key points included restoration of services to the long cut-off Tigray region and "unhindered access to humanitarian supplies."

The war in Africa's second-most populous country, which marks two years on Friday, has seen almost 10 million people displaced, with millions of people displaced.

The level of destruction is immense," the lead negotiator for Ethiopia's government, Bedwan Hussein, said. Lead Tigray negotiator Getachew Reda expressed a similar sentiment and noted that "painful concessions" had been made. Exhausted Ethiopians then watched them shake hands.

The full text of the agreement, including details on the disarmament and reintegration of Tigray forces, was not immediately available. "The devil will be in the implementation," said former Kenyan President Uhuru Kenyatta, who helped facilitate the talks.

Major questions remain. Eritrea, which has fought alongside neighboring Ethiopia, was notably not part of the peace talks. It's not immediately clear to



African Union envoy Olusegun Obasanjo, center rear, said Ethiopia's government and Tigray authorities agreed on "orderly, smooth and coordinated disarmament." THE GARDNER NEWS

what extent its deeply repressive government, which has long considered Tigray authorities a threat, will respect the agreement. Eritrea's information minister didn't reply to questions.

Eritrean forces have been blamed for some of the conflict's worst abuses, including gang rapes, and witnesses have described killings and looting by Eritrean forces even during the peace talks. On Wednesday, a humanitarian source said several women in the town of Adwa reported being raped by Eritrean soldiers, and some were badly wounded. The source, like many on the situation inside Tigray, spoke on condition of anonymity for fear of retaliation.

Forces from Ethiopia's neighboring

Amhara region also have been fighting Tigray rebels, but Amhara representatives are not part of the peace talks. "Amharas cannot be expected to abide by any outcome of a negotiations process from which they think they are excluded," said Tewodros Erfe chairman of the Amhara Association of America.

Another critical question is how soon aid can return to Tigray, whose communications and transport links have been largely severed since the conflict began. Doctors have described running out of basic medicines like vaccines, insulin and therapeutic food while people die of easily preventable diseases and starvation. United Nations human rights investigators have said the Ethiopian gov-

ernment was using "starvation of civilians" as a weapon of war.

"We're back to 19th century surgery," a surgeon at the region's flagship hospital, Fasilika Amdelessie, told health experts at an online event Wednesday. "It's like an open-air prison."

A humanitarian source said their organization could resume operations almost immediately if unfettered aid access to Tigray is granted. "It entirely depends on what the government agrees to... if they genuinely give us access, we can start moving very quickly, in hours, not weeks," said the source, who spoke on condition of anonymity because they were not authorized to speak publicly.

The conflict began in November 2020, less than a year after Ethiopian Prime Minister Abiy Ahmed was awarded the Nobel Peace Prize for making peace with Eritrea, which borders the Tigray region. Abiy's government has since declared the Tigray authorities, who ruled Ethiopia for nearly three decades before Abiy took office, a terrorist organization.

The brutal fighting, which also spilled into the neighboring Amhara and Afar regions as Tigray forces tried to press toward the capital, was renewed in August in Tigray after months of lull that allowed thousands of trucks of aid into the region. According to minutes of a Tigray Emergency Coordination Center meeting on Oct. 22, seen by the AP, health workers reported 331 civilians killed by drone strikes and airstrikes, and 265 injured, between Sept. 27 and Oct. 10 alone.

In a speech Wednesday before the peace talks' announcement, Ethiopia's prime minister said that "we need to indicate the victory we got on the battlefield in peace efforts, too. We are finalizing the war in northern Ethiopia with a victory... we will now bring peace and development."

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Attachment B

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CITY OF GARDNER

CITY OF GARDNER

LEGAL NOTICE

Community Outreach Meeting

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana product manufacturing is scheduled for December 7, 2022 at 5:00 pm at 246 Suffolk Lane Gardner MA 01440. The proposed Marijuana product manufacturing 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) 410-7736

Publication Date: October 27, 2022
Gardner News

Attachment C

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

~~XXXXXXXXXX LLC~~
~~46000000000000000000~~
245 Suffolk Lane
Gardner, MA, 01440



9590 9402 7780 2152 2961 08

2. Article Number (Transfer from service label)

7022 1670 0000 8928 8666

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☒ Agent
X  ☐ Addressee

B. Received by (Printed Name)
Kevin

C. Date of Delivery
1-3-22

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- | | |
|--|---|
| <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express® |
| <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail™ |
| <input type="checkbox"/> Certified Mail® | <input type="checkbox"/> Registered Mail Restricted Delivery |
| <input type="checkbox"/> Certified Mail Restricted Delivery | <input checked="" type="checkbox"/> Signature Confirmation™ |
| <input type="checkbox"/> Collect on Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | |
| <input type="checkbox"/> All Restricted Delivery | |

Domestic Return Receipt

Attachment C

CITY OF GARDNER
CERTIFIED ABUTTERS LIST

Parcel ID	Location	Owner	Owner 2	Mailing Address	City	State	Zip
X32-21-16	246 SUFFOLK LN	GARDNER		246 SUFFOLK LN	GARDNER	MA	01440
X32-2-1	SUFFOLK LN	GARDNER		115 PLEASANT ST RM 200	GARDNER	MA	01440
X32-7-1	SUFFOLK LN	GARDNER		115 PLEASANT ST RM 200	GARDNER	MA	01440
X32-21-7	SUFFOLK LN	GARDNER		115 PLEASANT ST RM 200	GARDNER	MA	01440
X32-22-17	SUFFOLK LN	GARDNER		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 *Colin Bennett*
Date: 6/23/21

Attachment C

Abutter List

All abutters where notified by mail on
11/01/2022

1. ~~Gardner Redevelopment Authority~~ 115 Pleasant st Gardner MA
2. ~~Advanced Realty LLC~~ 245 Suffolk Lane Gardner MA

Positive Impact Plan
Jolly Green Inc
246 Suffolk Lane Gardner MA 01440

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, has obtained 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 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 Fitchburg Massachusetts.

This will be accomplished by contracting out 50% of our vendors from Fitchburg 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 Fitchburg Massachusetts. Jolly Green intends on attending 1 # job fair 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 of 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 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 2 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 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 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.

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 _____, 20__.

Kyle Higgins
Secretary

EXHIBIT B
FORM OF SHARE CERTIFICATE

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 _____, 20__.

Kyle Higgins
Secretary

EXHIBIT B
FORM OF SHARE CERTIFICATE



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

William Francis Galvin
Secretary of the
Commonwealth

Date: November 30, 2022

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.

A handwritten signature in blue ink, reading "William Francis Galvin".

Secretary of the Commonwealth

Certificate Number: 22110645510

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

Processed by: ili



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

mass.gov/dor

Letter ID: L0832482336
Notice Date: November 30, 2022
Case ID: 0-001-777-095



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



JOLLY GREEN INC
60 FRANKLIN ST
WINCHENDON MA 01475-1252

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

CONFIDENTIAL

Jolly Green Inc.

EIN ID number 82-5286266

Cannabis cultivation license MC281283 & MC281283

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

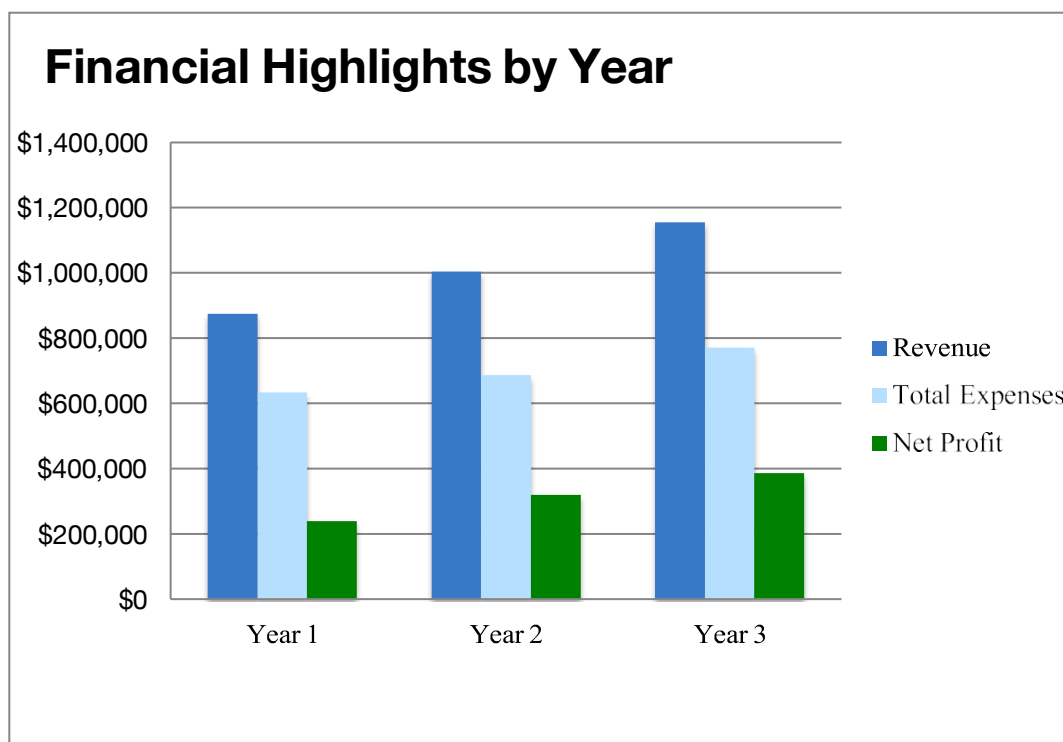
Jolly Green will fund its startup costs largely through a loan from Higgins Mechanical INC and personal savings.

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

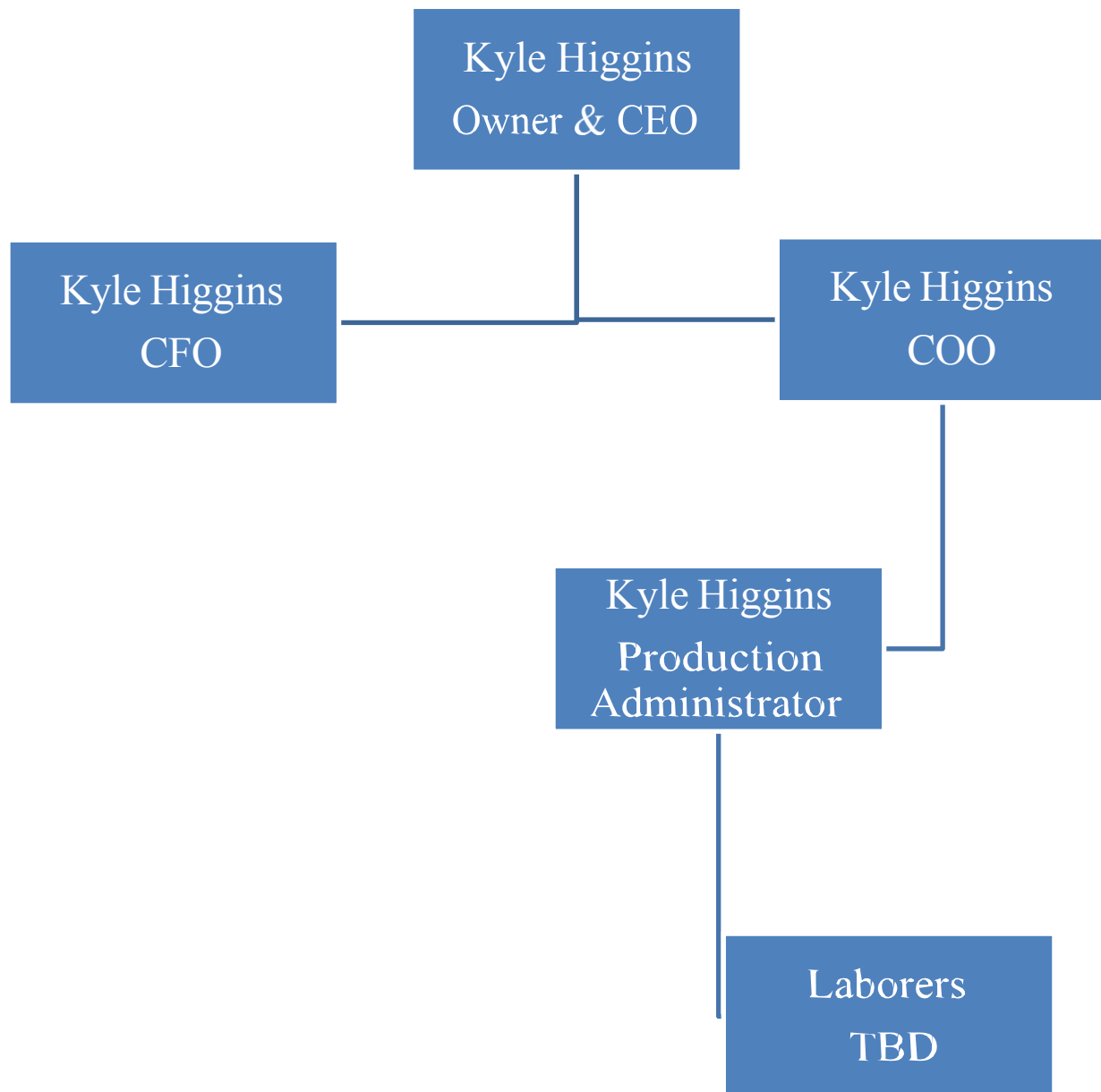
and processes we use to cultivate our cannabis. We will be knowledgeable, friendly resources to owners and agents of retail marijuana stores and processing facilities. Jolly Green is dedicated to raising the standard in product quality and leading by example in creating a higher code of ethics for businesses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

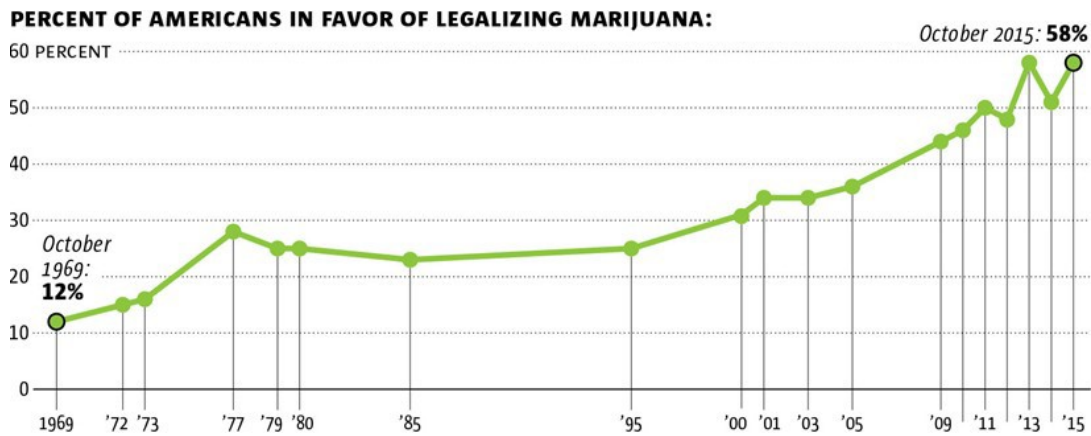
Pro Con recently reported that 28 states and the District of Columbia have legalized marijuana to some extent. The U.S. legal market value has now been projected to reach \$7.4 billion for 2016. The four-year national market potential is projected to increase by less than 300% to \$20.6 billion by 2020.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

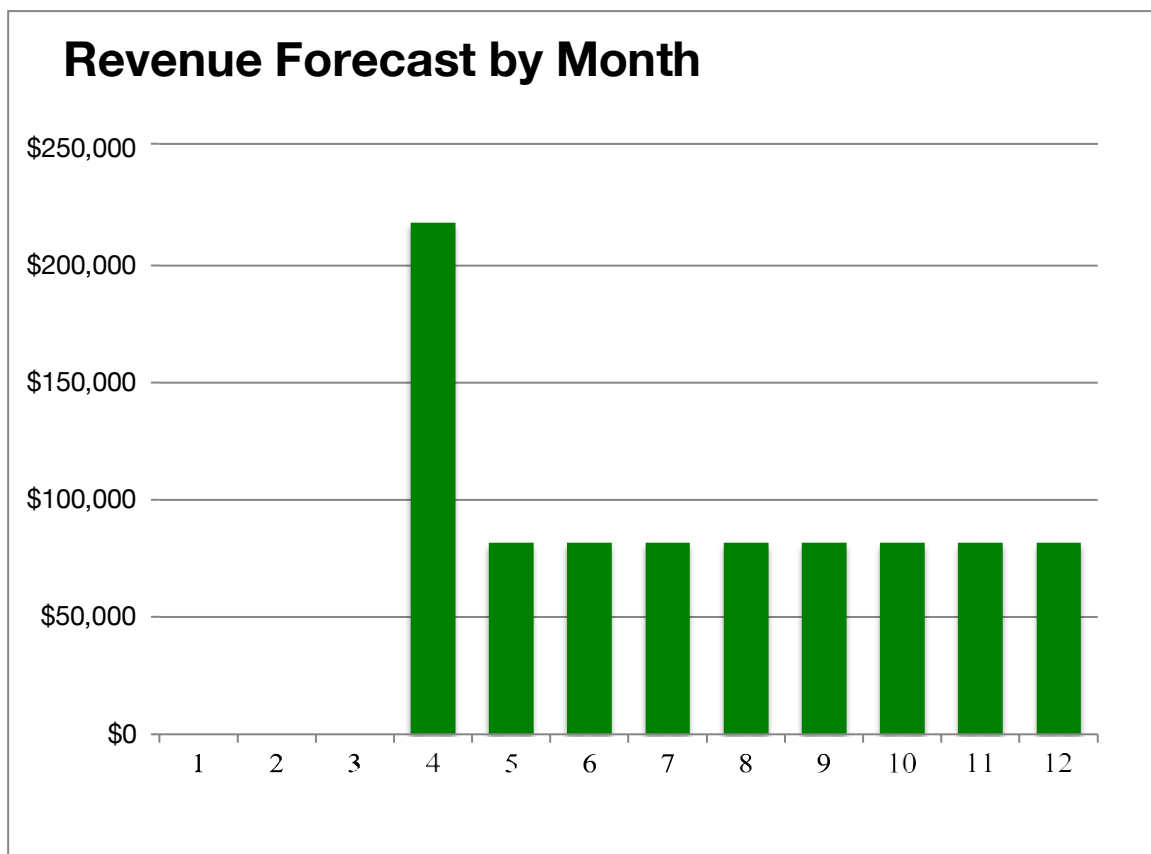
Completing Business Plan	March
Submit Business Plan, Associated Docs & Application	May
Securing a location	October
Facilities build out	December
Hire staff	March
Begin staff training	May
Complete staff training	July
Opening for business	September

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

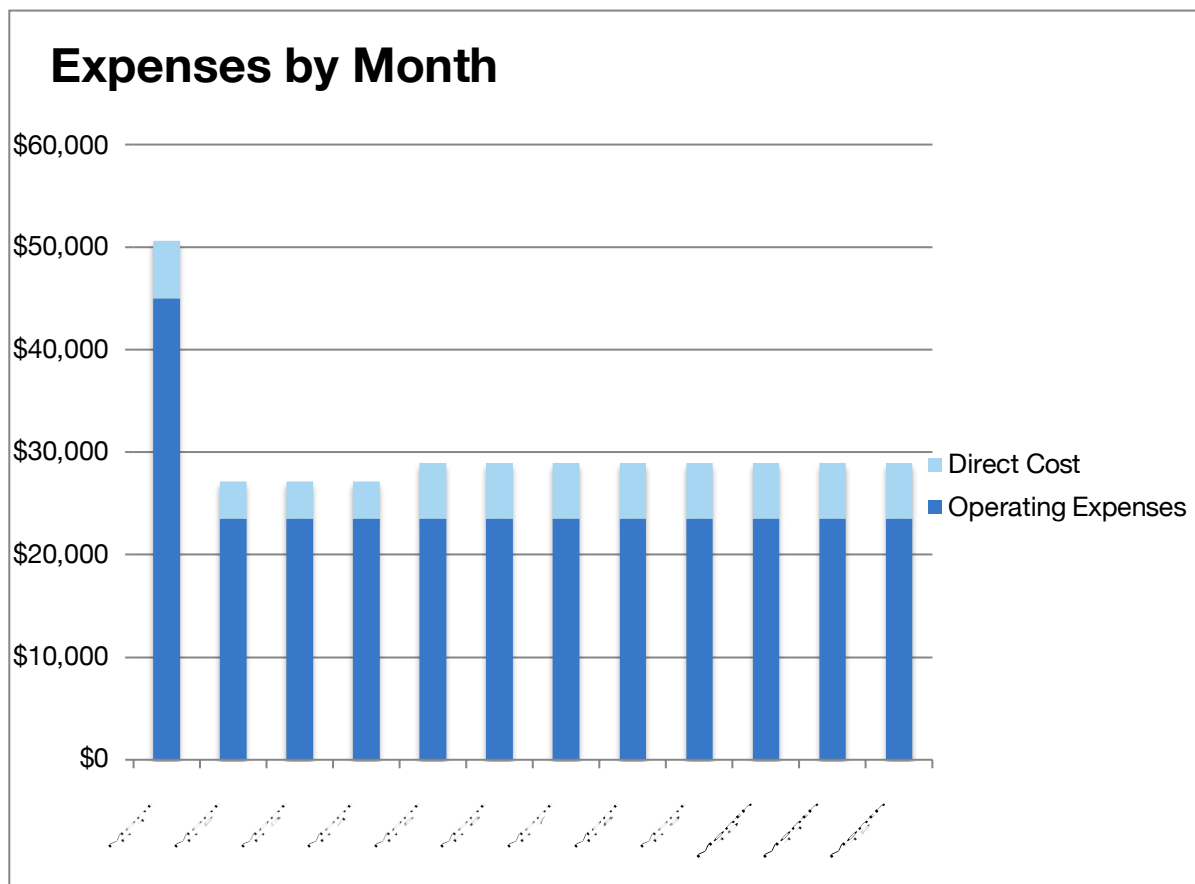
Personnel	Year 1	Year 2	Year 3
Operations & Production Administrator	\$70,000	\$72,100	\$74,263
Laborers	\$84,480	\$87,014	\$89,625
Total	\$154,480	\$159,114	\$163,888

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

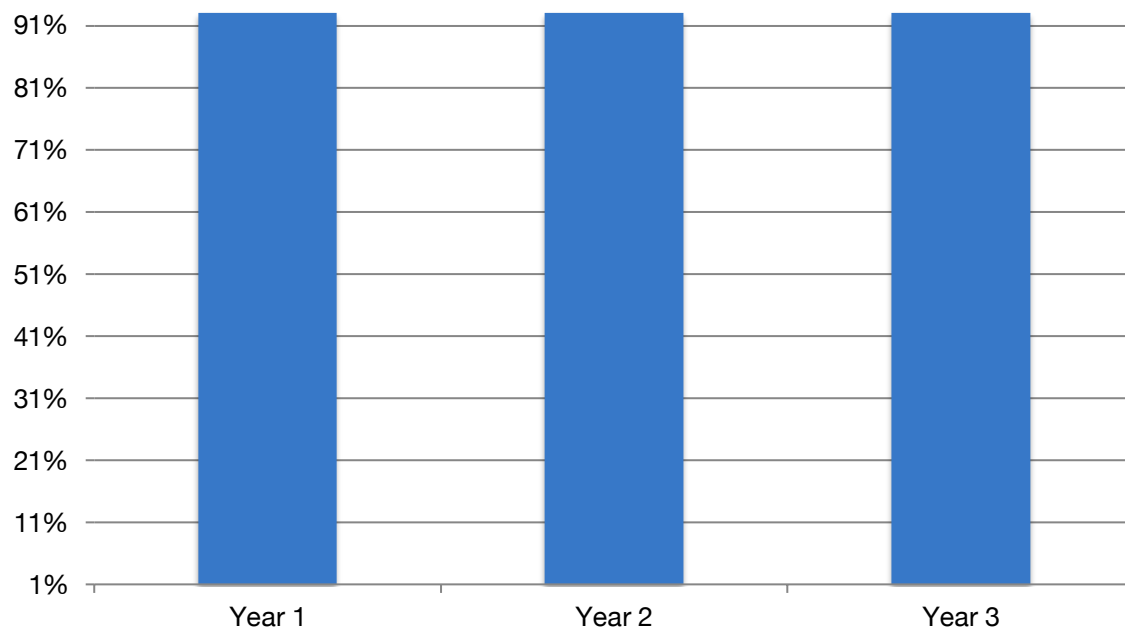
4.1 PROFIT AND LOSS STATEMENT

	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
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Professional Services (Accountant, Attorney, Consultant, etc.)	\$16,000	\$6,900	\$7,935

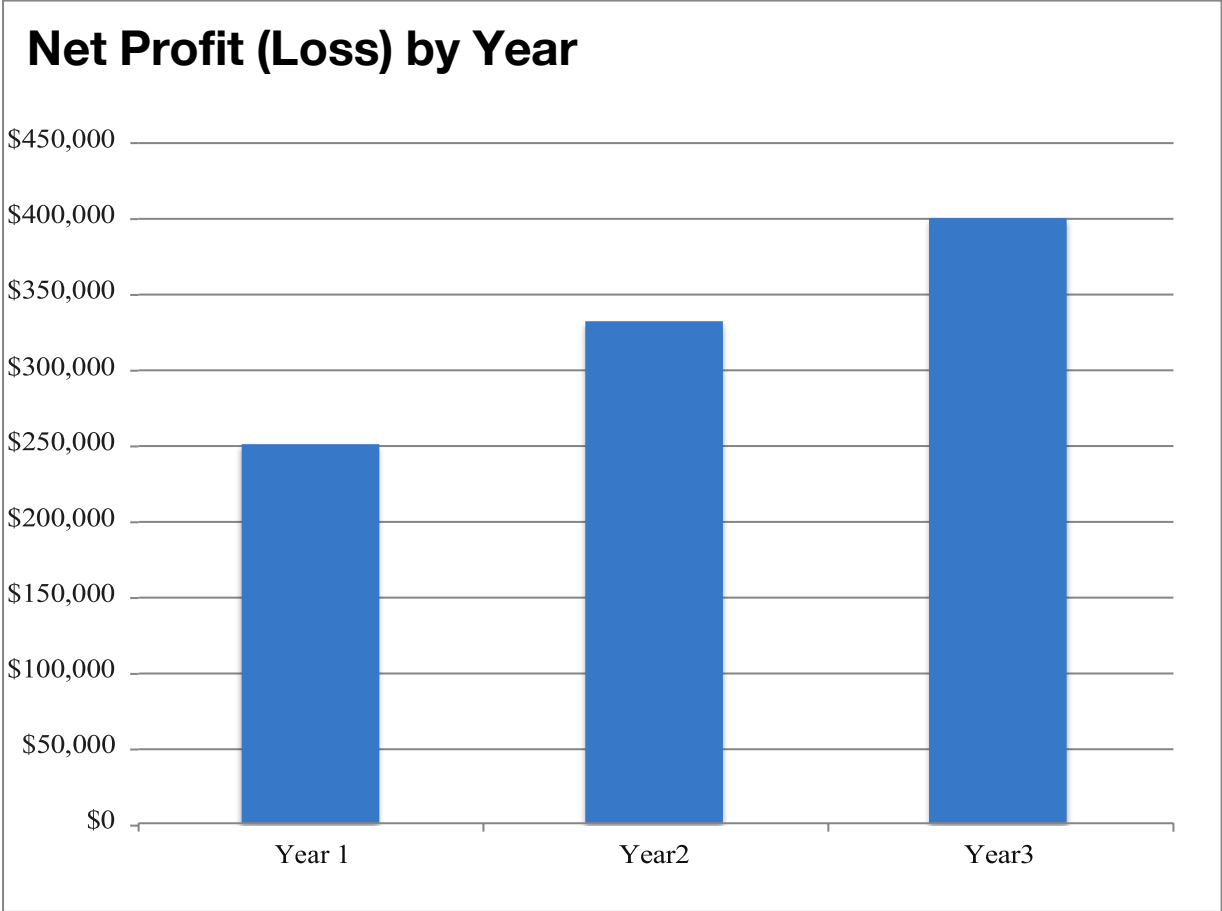
Annual Licensing & Dues	\$20,000	\$21,000	\$22,050
Other Expenses	\$2,000	\$0	\$0
Total Operating Expenses	\$327,424	\$327,250	\$350,370
Operating Income	\$486,297	\$608,529	\$725,776
Interest Incurred	\$6,190	\$4,933	\$3,618
Depreciation and Amortization	\$19,008	\$19,008	\$19,008
Income Taxes	\$210,407	\$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



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

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).



HUB International New England

Phone: 978-632-3400

Fax: 978-630-5390

Invoice # 2760242

Page 1 of 1

ACCOUNT NUMBER	DATE
JOLLGRE-01	06/14/2022
BALANCE DUE ON	AMOUNT DUE
06/14/2022	\$5,954.24

Kyle Higgins
Jolly Green Inc
442 Howard Street
Lunenburg, MA 01462

Pay My Bill Online

Visit our online portal to easily and securely pay your HUB invoice using your banking information (ACH)

www.hubinternational.com/paymybill

Commercial Package

PolicyNumber: PAC7230698

Effective: 06/10/2022 to 06/10/2023

Item #	Trans Eff Date	Due Date	Trans	Description	Amount
31631002	06/10/2022	06/14/2022	RENB	Package - franklin - Renewal	\$5,581.00
31631003	06/10/2022	06/14/2022	CFEE	MA Surplus Lines Tax	\$223.24
31631004	06/10/2022	06/14/2022	CFEE	Inspection Fee	\$150.00
Policy Invoice Balance:					\$5,954.24
Total Invoice Balance:					\$5,954.24

ADDITIONAL PAYMENT OPTIONS

PAY BY CHECK

Please remit your payment to:

HUB International

96 Shaker Road,
East Longmeadow, MA 01028

*** PREMIUM FINANCING OPTIONS MAY BE AVAILABLE UPON REQUEST; PLEASE CONTACT YOUR HUB REPRESENTATIVE ***

*** PLEASE RETURN A COPY OF THIS INVOICE WITH YOUR CHECK, AND REFERENCE ON THE PAYMENT YOUR INVOICE # 2760242 ***

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
				Minimum Premium
Products / Completed Operations	0	Area		Excluded

Additional Coverages

GL Total: \$ 1,000.00

Diversity Plan
Jolly Green Inc
246 Suffolk Lane
Gardner MA 01440

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.

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 Jolly Green Inc 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 & Maintenance of Financial Records Procedures.

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.

Maintenance of Financial Records Procedures:

- Jolly Green Inc will not be utilizing software or other methods that could manipulate or alter sales data.
- Jolly Green Inc. shall conduct a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. A Marijuana Retailer shall maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If a retailer determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data: it shall immediately disclose the information to the Commission; it shall cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and
3. take such other action directed by the Commission to comply with 935 CMR 500.105.
- Jolly Green Inc will comply with 830 CMR 62C.25.1 Record retention and DOR directive 16-1 regarding record keeping.

- Jolly Green Inc shall adopt separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales.
- Jolly Green Inc may colocated with a medical marijuana treatment center shall maintain and provide to the Commission on a biannual basis accurate sales data collected by the licensee during the six months immediately preceding this application for the purpose of ensuring an adequate supply of marijuana and marijuana products under 935 CMR 500.140(10).

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 Jolly Green Inc 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.

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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.

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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.

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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.
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Record Keeping Manager

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Record Types & Maintenance of Financial Records Procedures.

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- 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.
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- Updated emergency contact lists.
- Training records, including type of training offered, date taken, and names of trained employees.
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3. take such other action directed by the Commission to comply with 935 CMR 500.105.
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- Jolly Green Inc may colocated with a medical marijuana treatment center shall maintain and provide to the Commission on a biannual basis accurate sales data collected by the licensee during the six months immediately preceding this application for the purpose of ensuring an adequate supply of marijuana and marijuana products under 935 CMR 500.140(10).

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.
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- 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.

Staffing and Training Background checks 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.
- Background checks, all employees will submit to a background check prior to being employed with Jolly Green Inc.

- 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

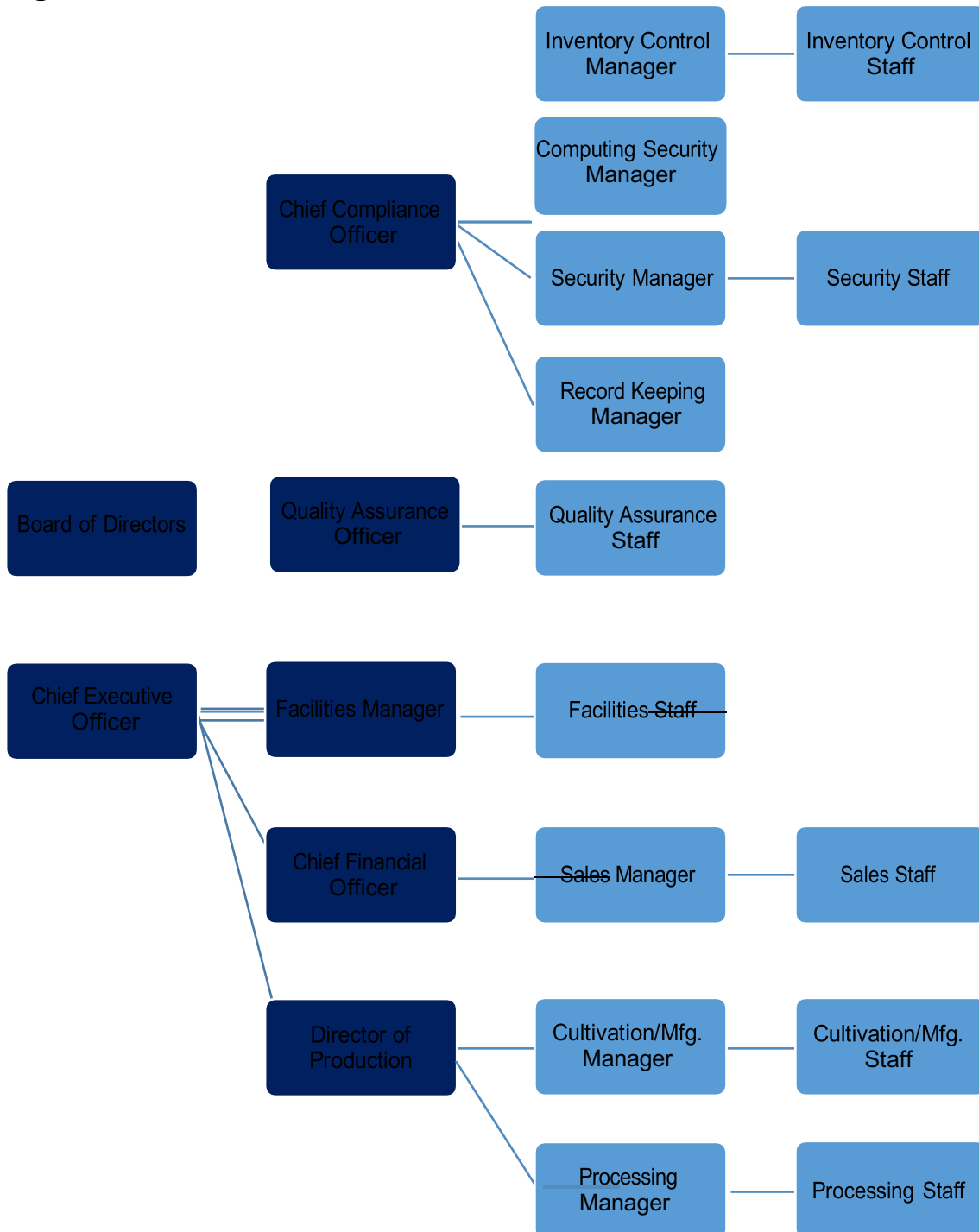
Record Keeping Manager

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 plan 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-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

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-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	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

Quality Assurance Plan



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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

-

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 [defines a serious adverse event](#) 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.

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Introduction

Jolly Green promotes a safe and healthy environment by developing plans and procedures to reduce risks associated with safety, health, and the environment in a manner consistent with responsible fiscal and environmental stewardship. This document is designed to provide guidance to employees on the important components of, and tasks involved in, maintaining a safe workplace for all.

Policy statement

The maintenance of a safe and healthful working environment and compliance with applicable regulations and standards are of the utmost importance to the successful operation of Jolly Green. Employees have a fundamental right to safe working conditions, and the prevention of occupational injury is an essential component of these conditions. No job is so urgent and no work is so important that Jolly Green cannot devote adequate resources and time to do it safely.

It is Jolly Green's intention to initiate and maintain high-quality accident prevention and safety programs through training, good communication, and the consistent improvement of procedures and operating plans. Managers are responsible for protecting the health and safety of the persons under their supervision, and all employees are responsible for monitoring conditions to help maintain a safe environment for themselves and their co-workers. This can only be achieved through a team effort and high level of commitment to a strong safety culture in the workplace.

Dissemination

A hard copy of this document will be kept in an easily-accessible location in each room where employees carry out related work, as well as in an administrative workspace that is accessible to all workers. An electronic copy will be available office. All of these locations will be clearly described to employees during health and safety training activities.

Responsibilities

Active participation by all employees is essential for the health and safety program to be effectively administered. Responsibilities will include the establishment and maintenance of a cooperative communication system between workers and managers. Therefore, all employees will ensure that information and warnings about workplace safety are properly followed and understood by intended recipients.

Management Responsibilities

Management will play a key role in fostering a safe working environment for all employees and persons present on the premises by exhibiting a strong knowledge of these procedures and actively engaging in health and safety guideline implementation. Managers will train employees, preside over departmental safety meetings, conduct incident investigations, and perform workplace inspections.

Jolly Green is committed to providing employees with current information about workers' rights and labor laws as they relate to safety and health issues. The poster titled "OSHA Job Safety and Health: It's the Law" will be clearly displayed with other safety-related materials in one or more areas frequented by all employees.

Workers' Compensation

As required by law, Jolly Green provides workers' compensation insurance coverage for employees, except for some specific exclusions.

Chief Compliance Officer

The Chief Compliance Officer (CCO) will be responsible for carrying out the following:

1. Allocate adequate funding for personal protective equipment (hereafter referred to as PPE) and safety training.
2. Ensure sufficient supervisor support and employee time is allocated for initial and follow-up safety-related training.
3. Oversee the training program and tracking of training requirements and completions.
4. Obtain new training programs and/or updating existing programs so employees receive current information in their refresher training sessions.
5. Develop a system to ensure that training records are forwarded to the Record Keeping Manager.
6. Establish a Safety Committee, lead Safety Committee meetings and all-hands safety meetings or designate another committee member to do so, and ensure that the committee meets on a quarterly basis and carries out its mandate as described in this document.
7. Ensure that each employee has received an initial Health and Safety and facility orientation before work commences.
8. Be responsible for the record keeping and reporting requirements as stipulated by OSHA (<https://www.osha.gov/recordkeeping/>) (contains links to forms 300, 300A and 301) and ensure all regulations are followed.
9. Follow the progress of injured employees.
10. Oversee the investigation of all incidents and report findings to upper management.
11. Engage with management and employees on improvements to safety procedures.
12. Ensure that a complete set of updated SDS records is maintained in a location where they may be safely accessed in case of an emergency that requires evacuation of one or more rooms.

With the assistance of departmental managers, the CCO will be responsible for carrying out the following:

1. Ensure that all employees have been trained in the safety policies and procedures pertaining to their specific area of responsibility.
2. Ensure that employees receive training on the safe operation of equipment before the equipment is used.
3. Evaluate and document the required PPE for each task.
4. Ensure that employees receive required PPE before starting work on tasks for which it is required and understand how to use it safely.

5. Ensure that employees perform their duties in compliance with this program.
6. Correct unsafe behavior through supplemental training or disciplinary action.
7. Inform employees about all potential hazards and hazardous chemicals that may be encountered during the course of their work (See the Hazard Communication section of this document for more details).
8. Evaluate the efficacy of the employee's application of this program on an annual basis, or at a specific frequency.
9. Perform daily walk-around inspections for potential hazards and taking corrective action in a timely manner.
10. Conduct toolbox and other supplementary or refresher training activities.
11. Investigate all incidents completely and take corrective actions necessary to prevent further incidents and hazards.
12. Incentivize employees to participate in this safety program.

Safety Committee

A Safety Committee will be formed to allow management and employee to collaboratively identify safety issues through quarterly inspections, formulate safety strategies, determine solutions, review incident reports and evaluate this program. Management will ensure that Safety Committee members are allowed an adequate amount of time to plan, carry out, and document inspections; conduct regular meetings and complete other tasks outlined in this plan.

The Committee will meet at least quarterly and will consist of at least one manager from each department and an elected employee member representative from each department. Employees from each department will vote for a departmental employee representative during the first full week of each calendar year, or when a new representative is required. Voting will occur either by written ballots or via an online voting system. The results of each election will be emailed to all represented employees within one week of the end of the voting period and noted in the minutes of the next Safety Committee meeting.

Duties of the Safety Committee include:

1. Conducting quarterly self-safety inspections

2. Checking first aid kits two times a year
3. Communicating and engaging with employees they represent regarding safety issues
4. Encouraging safe work practices
5. Maintaining a safety bulletin board for information and announcements
6. Evaluating the Health and Safety Program on an annual basis

One member of the Safety Committee will be tasked to take the minutes of both Safety Committee meetings and all-hands safety meetings. This person will ensure that the minutes are distributed to all employees and that a copy is forwarded to the Record Keeping Manager and posted on the safety bulletin board until the next meeting.

Facilities Manager

1. Implementation of the Emergency Action Plan (EAP) described below in cases that involve property damage
2. Development of the specific evacuation procedures for the premises as described in the EAP
3. Conducting and documenting results of evacuation drills

Security Manager

The Security Manager is responsible for the implementation of the EAP below in cases that involve contact with emergency responders. Additional details related to security are specified in Jolly Green's Comprehensive Security Plan.

Employee Responsibilities

1. Adhere to the procedures of this safety program, OSHA standards, and state and local safety standards.
2. Be available to participate in all required training and comply with safety requirements.
3. Promptly report unsafe conditions, behaviors and hazards to management.
4. Promptly report incidents and injuries, regardless of seriousness, and near-miss incidents to management.
5. Make suggestions to supervisors, management or Safety Committee representatives about changes that could improve employee safety.

6. Attend all-hands safety meetings.

All-Hands Safety Meetings

Employees are required to attend all-hands safety meetings held two times per year. The CCO will lead the meetings or designate another Safety Committee member to do so. If an employee misses a meeting, his/her supervisor will ensure that the employee reads the minutes of the meeting once it is available and initials a copy of the minutes attesting to having read it. If the safety meeting involves a required training module, the employee will complete the training within 30 calendar days of missing the meeting.

The purpose of the meeting is to discuss potential safety problems, develop solutions, review incident reports, provide training, evaluate the effectiveness of the safety program, and address other matters as recommended by management or the Safety Committee.

Hazard Prevention and Control

Effective controls to protect workers from workplace hazards; prevent injuries, illnesses, and incidents; minimize or eliminate safety and health risks; and help provide workers with safe and healthy working conditions. Jolly Green is aware of the types of risks associated with a cannabis business workplace (Table 1).

Table 1. Cannabis Workplace Hazards

	Cultivator	Trimmer	Extractor	Manufacturer	Budtender	Lab Tech	Administrator	Transporter	Maintenance Tech
Allergens/Sensitizers	X	X	X		X				
Burns				X					
Chemical Exposure	X	X	X	X					
CO	X	X							
CO2	X	X							
Cuts		X		X					
Elevated Heights									X

Electrical Hazards									X
Ergonomics	X	X	X	X	X	X	X	X	X
Flammable Chemicals			X						
Lighting Hazards	X								
Machinery		X	X						
Mold	X	X							
Noise			X	X					X
Pesticides/ Fungicides	X	X							
Solvents						X			
Walking Surface Hazards	X								X
Tool Use Hazards									X
Vehicle Accidents							X	X	
Volatile Organic Compounds			X						
Workplace Violence					X		X	X	

Jolly Green implements a common hierarchical structure to prevent workplace hazards, described below.

Priority #1: Elimination and Substitution

As the most effective controls for reducing hazards, this category is considered the highest priority. These controls include eliminating a hazard altogether from a specific process or substituting a less hazardous activity or chemical for a more hazardous one. During the planning process, Jolly Green has implemented the following controls that fall into this category:

Priority #2: Engineering Controls

An engineering control is any change in facilities, equipment, tools, or process that eliminates or reduces a hazard. Engineering controls are designed to remove a hazard at its source before it comes in contact with the worker. Examples of engineering controls include process controls, isolation, and ventilation.

Priority #3: Work Practice/Administrative Controls

These are methods to reduce the likelihood of injuries and other risks by managing the way in which a task is performed. The following list includes examples of Jolly Green's work practice controls:

- Written procedures
- Job hazard analyses
- Employee training and refreshers
- Safety checklists
- Use of a buddy system when carrying out high-risk tasks
- Signage with safety reminders

Priority #4: Personal Protective Equipment (PPE)

When hazards cannot be controlled through other means, PPE plays an important role in protecting workers. To ensure that the use of PPE is effective, management will provide an adequate supply of each type of item and ensure that employees are trained in its safe use. In turn, the employee will follow all procedures related to the use of PPE and notify a supervisor when PPE supplies get low.

The Safety Committee will regularly solicit suggestions from all employees to further identify methods to meet the priorities listed above.

Job Hazard Analysis (JHA)

As a part of the ongoing safety program, Jolly Green will conduct a hazard analysis for each position. This is a technique that focuses on job tasks as a way to identify hazards before they occur. It focuses on the relationship between the worker, the task, the tools, and the work environment. Steps to conduct an analysis will follow the suggestions of OSHA booklet *Job Hazard Analysis*, found at <https://www.osha.gov/Publications/osh3071.html>.

The CCO will prioritize tasks for a JHA and ensure they are performed in a timely and practical manner. The probability and severity of potential injuries will serve as a guide for prioritizing tasks. Each high-risk job task will be analyzed at least once a year, whenever there is a change in how the task is done (including the use of different equipment), or if an injury occurs while doing the task. Low-risk job tasks will be analyzed once every three years.

The JHA will be conducted by the supervisor of that job task or another individual deemed qualified by the CCO and the supervisor. Employees will be requested to assist an analyst in carrying out a JHA early on in the process.

If the steps of a task will be modified, employees will be given an opportunity to comment on the recommended changes before a new procedure is finalized. Employees will be trained in the revised operation and the use of any newly-required PPE. The results of the JHA will be documented, reported to the Safety Committee, and related records forwarded to the Record Keeping Manager for archiving.

During the selection phase, high-risk tasks will be prioritized according to the following:

1. Previous injury or near miss while doing the task on the premises
2. Severity of potential injury
3. Highest injury rates according to industry information
4. Complexity of task
5. Newly-established or modified tasks
6. Special (non-routine) tasks

The analyst will conduct a JHA by taking the following steps:

1. Notify employees who complete the task of a pending JHA and ask them to consider potential hazards or near misses they have noticed while working.
2. Review documentation on known hazards related to the task according to industry literature and records of previous injuries on the premises.
3. Meet with employees to discuss the hazard and near miss experiences they have encountered.
4. Work with employees to review or create a list of subtasks broken down into reasonable steps.
5. Observe an employee performing the task and verify or correct the subtask description.
6. Begin a JHA form (Appendix 1) for each hazard identified.
7. Analyze each subtask for existing and potential hazards.
8. Develop possible solutions for each hazard.
9. Complete the JHA form for each hazard.
10. Review the recommended solutions with the employees and make modifications if applicable.
11. Update the task-specific SOP and initiate the order of additional PPE if needed.
12. Forward all related records to the appropriate managers, employees, and the Record Keeping Manager.
13. Complete retraining of all employees who carry out the task if changes are made. In a case where a high-risk hazard is identified, an employee will complete the retraining before doing the task again.
14. Forward all retraining records to the Record Keeping Manager.

Hazard Communication Plan (HAZCOM)

Purpose

The management of Jolly Green is committed to preventing accidents and ensuring the safety and health of all employees and site visitors. This Hazard Communication Plan was established to ensure that consistent and uniform information is available for chemical materials and other hazardous substances on the premises, that employees are aware of hazardous materials with which they work, and that training is provided in procedures and practices necessary to control exposures to these materials. The plan applies to materials known to be

present in such a manner that employees may be exposed under normal conditions of use or in a foreseeable emergency. The plan is not restricted to chemicals in a limited sense but applies to a broad range of hazardous materials including, for example, pure chemicals or mixtures.

Responsibilities

Supervisors and managers, under the supervision of the CCO, have additional responsibilities related to Hazard Communication. These include:

1. Providing each employee who will work with hazardous materials specific information and training on hazardous chemicals in the work area
2. Auditing the work practices of their employees to verify engineering and administrative controls and PPE designed to prevent employee exposures to hazardous substances are being properly employed
3. Maintaining a current chemical inventory for hazardous substances used and stored in areas under their supervision
4. Verifying the labeling of chemical substances in their work areas
5. Maintaining a notebook with safety-related information, including Safety Data Sheets (SDSs) used in each work room and ensuring that the information is up to date and in a location that is easily accessible to those using the materials
6. Reviewing their individual inventories at least annually to weed out unnecessary chemicals for disposal
7. Ensuring the development and evaluation of standard operating procedures (SOPs) for chemical processes under their supervision
8. Conducting required Hazard Communication review training for all their employees and verifying that these individuals fully understand their rights to hazard information and how to use it to protect their health and safety
9. Conducting periodic reviews for workplace hazards and developing corrective actions for hazards identified

Identification of Hazardous Materials

Jolly Green applies the requirements that have been established under the Globally Harmonized System (GHS) of Classification and Labeling of Chemicals (http://www.unece.org/trans/danger/publi/ghs/ghs_rev02/02files_e.html) and

<https://www.osha.gov/dsg/hazcom/global.html>). The GHS is a recently updated method to define and classify the hazards of chemical products and communicate health and safety information on labels and safety data sheets.

Employees will be trained in how to identify hazardous materials according to the methods utilized in the GHS, including:

- The manner in which hazards are communicated, including placards, labels, and SDSs
- GHS label elements, including hazard pictograms, signal words, hazard statements, precautionary statements, product identifiers, supplier identification, and potential supplemental information
- GHS label format
- Safety Data Sheet information, including the purpose of and data found in each of the 16 sections

See Appendix 2, the Hazardous Chemical List, for information on all hazardous chemicals with a potential for employee exposure at this workplace. The list includes links to access the manufacturer’s Safety Data Sheet (SDS) for each item.

Container Labeling

All original hazardous chemical containers used will either have the original manufacturer’s label or a label made on-site with all required information. If a supervisor determines that a new label needs to be created for a container, the specifications described in the OSHA Brief “Hazard Communication Standard: Labels and Pictograms” (<https://www.osha.gov/Publications/OSHA3636.pdf>) will be followed.

Original containers will contain the following information:	
<div><div>1. Product Identifier</div><div>2. Signal Word</div><div>3. Hazard statements</div><div>4. Pictograms</div><div>5. Precautionary statements</div><div>6. Manufacturer information (name, address, telephone number)</div></div>	<div>Employees will ensure that all containers are appropriately labeled. No container will be released for use until its label information is verified. Workplace labels will be clearly legible and in English.</div>

Labeling for primary and secondary (portable) containers will adhere to OSHA standards according to the document “Labeling and Transfer of Chemicals” (<https://www.osha.gov/Publications/laboratory/OSHAquickfacts-lab-safety-labeling-chemical-transfer.pdf>).

Physical Hazards

There are a number of physical hazards that could be present in the workplace. The Safety Committee will make it a priority to identify and minimize these types of hazards during inspections, and employees will be trained to notify a supervisor if an unaddressed physical hazard has been identified. Some examples of potential physical hazards include:

- Hot liquids, steam, or hot surfaces
- Equipment that contains material under high pressure
- Broken glass
- Overcharged or faulty lithium batteries
- Electrical components
- Improper use of extension cords
- Cluttered work areas
- Obstructed access panels
- Flammable materials left near electrical equipment
- Wet surfaces (floor or counter)
- Degrading, flawed, or damaged equipment
- Inadequate ventilation or lighting
- Tripping hazards
- Equipment set up on unstable surfaces
- Ergonomic risks
- Work areas where employees are exposed to heat or loud noises
- Horticultural Lighting

Environmental Hazards

An environmental hazard can be defined as a substance, a state or an event which has the potential, either alone or in combination with other hazards, to threaten the surrounding environment or otherwise adversely impact people's health. Although hazardous chemicals are addressed under the Hazard Communication section, the release of large amounts of chemicals during flooding, an earthquake or other natural disaster, could also make the event environmental in nature.

Special Tasks

Before employees may perform special (non-routine) tasks that may expose them to a new hazard, management will complete a JHA and inform them about the associated risks. Management will also provide information about how to control exposure or risk and what to do in an emergency. Managers will evaluate the hazards of these tasks, provide appropriate controls, including PPE, and all additional necessary training.

Hazard Communication Training

Management is responsible for ensuring that all employees receive Hazard Communication Training within seven (7) days of the commencement of employment and before being exposed to any hazards without direct supervision. After attending the training, employees will sign a form verifying that they understand all procedures and how to follow them. A written test may be given to verify employee comprehension of relevant topics.

Hazard Communication Training will include the following topics:

1. An overview of the requirements in OSHA's hazard communication standards
2. All information related to the GHS described above under "Identification of Hazardous Materials"
3. Hazardous chemicals present on the premises, used near work stations, and that the employee will have direct contact with, as well as other related topics specified under the asterisk (*) below
4. Methods used to detect the presence or release of hazardous chemicals in the work area
5. Physical and environmental hazards the employee may be exposed to in the workplace
6. Steps taken by Jolly Green to prevent or reduce exposure to these hazards
7. An explanation of any special labeling present in the workplace
8. Emergency procedures to follow if anyone is exposed to chemicals
9. The locations of the written Hazard Communication Plan, SDSs, and related safety records
10. What a Hazard Report Form (Appendix 3) is and how to fill one out and submit it

* In addition to a general introduction to hazardous chemicals an employee will use, the employee will also receive task-specific training related to the risks, required PPE, spill response, and first aid response to each. This will occur at the workstation where the employee will be working with the chemical to ensure that the locations of safety equipment and safety documentation are clearly identified. This additional training session will be documented in writing and signed by the employee and the supervisor.

All documentation related to training will be forwarded to the Record Keeping Manager and maintained in a manner that complies with OSHA standards.

Personal Protective Equipment (PPE)

As part of a Job Hazard Analysis, a PPE Assessment Form (Appendix 4) will be completed for each task. The PPE and related training will be provided to the employee free of charge. If respirators are necessary, additional training and fitting will be provided, following standards established by OSHA (<https://www.osha.gov/SLTC/respiratoryprotection/standards.html>).

During each periodic safety inspection, the inspector will evaluate the use of PPE in each work area using a PPE Inspection Questionnaire (Appendix 5).

Documentation and Records

One or more clearly-labeled safety notebooks will be kept in each work room where hazardous activities may occur and contain the following information:

1. The Health and Safety Plan
2. Updated copies of SDSs for each chemical or other hazardous material used in the area
3. Completed Job Hazard Analysis Forms
4. Records of task-specific training signed by both the employee and the trainer
5. Completed PPE Assessment Forms for each task carried out in the area
6. Training records
7. Results of inspections conducted by the Safety Committee
8. Results of investigations of hazards related to work conducted in the area

The original copies of Items 3-8 above will be forwarded to the Record Keeping Manager.

Chemical Storage

Selection of a Storage Area

- A site will be selected not likely to flood or expose the chemicals to water.
- When possible, it will be at least 100 feet from surface water and downslope from wells and other sensitive factors like feed storage areas.
- Depending on how much chemicals will be stored, the site will also minimize the potential for runoff into streams or other areas.
- If prevailing winds in the area come mostly from one direction, locate the storage downwind from dwellings as much as possible.

The Storage Facility

- Keep the storage area or facility as small as practical. This makes it harder to have more chemicals on site than what is really needed.
- Chemical storage will comply with directions specified in Section 7, Handling and Storage, of the SDS.
- Each area will have a label specifying the chemical category (hazard class) stored within.
- Chemical storage areas will have enough ventilation to keep air contaminants below the permissible exposure levels (PEL), Air Contaminants, and below 25% of the lower explosive limit (LEL) when employees enter the facility.
- If a facility is specifically built for storage of restricted-use pesticides, best practice is to use as much non-flammable material as possible. Nonabsorbent interior materials are preferred.
- Floors and shelves are to be nonabsorbent or have nonabsorbent coatings when storing restricted-use pesticides.
- There will be enough natural or artificial light inside the storage area to allow workers to work safely, at least 20 foot-candles of light.
- Control the temperature inside the facility so that the chemicals do not freeze and the conditions meet the storage recommendations of the manufacturer.
- Locations used for the storage of restricted-use pesticides will be locked when an employee is not actively working with the materials.

- All doors to rooms containing hazardous materials will be clearly marked according to the [NFPA classification system](#). This is especially important for rooms with chemicals or materials that react to contact with water or oxygen.

Hazardous Material Segregation

Segregation is defined by Chapter 50, Section 5003.9.8 of the 2012 International Fire Code (IFC) as follows:

- Separating of incompatible materials in storage by a distance of not less than 20 feet
- Isolating incompatible materials in storage by a noncombustible partition extending not less than 18 inches above and to the sides of the stored material
- Storing liquid and solid materials in hazardous materials storage cabinets (Incompatible materials will not be stored within the same cabinet or exhausted enclosure)
- Storing compressed gases in gas cabinets or exhausted enclosures in accordance with 2012 IFC 5003.8.5 and 5003.8.6

A copy of the relevant 2012 IFC can be viewed at

<https://codes.iccsafe.org/content/IFC2012/chapter-50-hazardous-materials-mdash-general-provisions>.

Handling

- Prior to receiving a new chemical, the SDS will be consulted to plan a safe location for the storage of the material.
- Received chemicals will be moved from the central receiving areas as soon as possible.
- Large glass containers will be placed in padded packaging (if they are not in their original shipping boxes/containers) during transportation from one location to another.
- Once in the work area, chemicals will be immediately unpacked and placed in approved storage cabinets/locations, and packing boxes will be removed from the work area for recycling or disposal.

Safe Storage Practices

- All recommendations provided by the manufacturer on the SDS will be adhered to at all times.
- If the container label becomes illegible, determine the information from the SDS and create a new label that complies with GHS standards.
- A supervisor will be notified immediately of any unidentified/unlabeled chemicals. All personnel who work in the area will be consulted to attempt to identify the material. If the material cannot be identified, it will be disposed of according to the SDS recommendations for the most hazardous chemicals on the premises.
- Do not store or temporarily place a chemical in an incompatible container. Check the SDS for storage requirements.
- Do not store pesticides with non-related equipment.
- Hazardous materials will be stored below eye level.
- Large bottles will be stored on lower shelves close to ground level.

Safety Inspection Procedures

Jolly Green is committed to identifying hazardous conditions and practices which are likely to result in injury or illness to employees. Prompt action will be taken to eliminate identified problems.

Supervisors will inspect their own workspaces and equipment for hazards at routine intervals to reduce safety risks. They will also perform an immediate inspection whenever a serious potential hazard is reported and, if necessary, stop work until the problem is solved.

Quarterly Safety Inspections

Each quarter, before the regularly scheduled Safety Committee meeting, the manager/employee team representing each department will inspect their assigned areas for hazards using the Safety Inspection Guide (Appendix 6), which is a checklist to ensure that hazards are not overlooked. Committee representatives are encouraged to inspect each other's areas once per year because another inspector may notice something different based on her/his own experiences.

An effort will be made to conduct inspections at different times of the day or during different processes so that various operating conditions and shifts can be observed. In production

areas, inspectors will periodically begin where raw materials arrive and follow the flow through machining, assembly, finishing, and shipping processes.

Components of the inspection will include the following steps:

1. Print out a Safety Inspection Guide and a PPE Inspection Questionnaire to have during the inspection.
2. At each level of process, identify activities and conditions where an injury is most likely to occur. If any items are of a critical nature or present an imminent danger, these critical items will be immediately addressed before work continues.
3. Talk to employees in the department about potential hazards, near misses, and other safety concerns while doing a walk through.
4. Fill out a Hazard Report Form for each identified hazard. If the manager is present for the inspection, he/she may wish to complete the investigation portion of the form during the inspection.

Hazard Report Forms begun during an inspection will be forwarded to the Safety Committee.

The results of the area inspection and any action taken will be posted in the affected area, and the results of the previous inspection will be moved to the appropriate section of the safety notebook.

The results of inspections will also be used in developing inspection checklist improvements and measuring the effectiveness of the Health and Safety Program.

Addressing Unsafe Work Practices

If an unsafe action by an employee during the completion of a task is observed during an inspection, the observed action will be recorded on a Hazard Report Form. Only the unsafe activity and location will be recorded, not the employee's identity. The supervisor for that area will be informed of the unsafe work practice so that changes can be made. Changes may include retraining the group or a particular employee and reinforcing the safe work practice, or making a physical change so the unsafe act can be avoided. If the unsafe activity represents negligence on the part of the employee, an Incident Report Form will be filled out instead.

Hazard Reporting

All employees share responsibility in ensuring a safe workplace. Employees are required to report physical hazards, unsafe behaviors and accidents. Management will investigate physical hazards when they are reported. To further ensure a healthy safety culture, Jolly Green strongly encourages employees to bring suggestions to improve safety to the attention of supervisors. All of the above can be reported with a Hazard Report Form.

If an immediate hazard has been encountered, the following steps will be taken:

1. The employee will cease working on the task or equipment relevant to the hazard.
2. The employee will immediately and verbally notify a supervisor.

For all types of hazards:

3. The employee will complete a copy of the Hazard Report Form and submit it to the supervisor.
4. The supervisor can serve as an investigator for the purposes of examining the hazard and developing a solution. If so, the Investigator portion of the form will be completed prior to forwarding it to the Safety Committee.
5. The Safety Committee will respond to the form within 30 days with a proposed action (if not already resolved) or a reason an action is not necessary.
6. The Safety Committee's conclusion will be forwarded, via a copy of completed Hazard Report Form, to the supervisor, the reporting staff member, and the Record Keeping Manager.

Safety Rules and Procedures

The following set of safety procedures are created to ensure a safer work environment for employees and facility guests.

Basic Safety Rules

1. Do not store materials or block aisles in a manner that impedes access to emergency exits, ramps, loading docks, walkways or stairs.
2. Using or being under the influence of alcohol or illegal substances at work is prohibited.
3. Obey all safety warning signs.
4. Horseplay, fighting and running are prohibited.
5. Firearms, fireworks and explosives are prohibited on company property.
6. Smoking anywhere other than designated smoking areas is prohibited.
7. Practice good housekeeping.
 - a. Clean up spills immediately.
 - b. Replace tools and supplies after use.
 - c. Do not allow waste and debris to accumulate.
8. Doing anything unsafe in order to expedite a process or complete a task is prohibited.
9. Report unsafe working conditions, hazards and damaged safety equipment.
10. Do not operate equipment without proper training AND authorization.
11. Always use PPE as/when required.
12. Do not use damaged equipment or equipment with damaged safety guards.
13. Do not remove, tamper with, or disable any safety device.
14. Always store objects in a safe manner. Piles of boxes, for example, will be secured if found to be unstable in any way.
15. Only use a tool for its intended purpose.
16. Electrical tools and equipment will be properly insulated and grounded.
17. Know the locations of fire extinguishers and emergency equipment.
18. Request assistance with heavy or bulky materials to avoid injury.

Working With Water

1. Ensure that all managers know where and how to turn off water to the building in case of a broken pipe.
2. Mop up spilled or standing water/liquid.
3. Do not stand in water or on wet surfaces when operating power hand tools, portable electrical appliances, or when holding or pushing heavy objects.
4. Do not use a power hand tool to cut wet or water-soaked building materials, or to repair a leaking pipe.
5. Do not use a power hand tool while wearing wet cotton gloves or wet leather gloves.
6. Never operate electrical equipment barefooted. Wear rubber-soled or insulated work boots.
7. All containers with a water weight of over 30 lbs. will have caps or other protection to avert spillage.

Hazardous Chemicals in Pipes

This workplace follows the state and federal labeling requirements concerning the labeling of pipes. Before working in areas where hazardous chemicals are transferred through unlabeled pipes or where pipes are insulated with asbestos-containing material, employees will contact Director of Operations for the following information:

1. The names of the chemicals in the pipes
2. The physical or health hazards of the chemicals present
3. The safe work practices necessary to prevent exposure
4. The location of the SDS for more detailed

Ladder Safety

1. Inspect equipment before use for physical defects.
2. Ladders are not to be painted except for numbering/identification purposes.
3. Do not use ladders for skids, braces, workbenches, or any purpose other than climbing.
4. When ascending or descending a ladder, do not carry objects that will prevent holding the ladder with both hands.

5. Always face the ladder when ascending and descending.
6. Always maintain three points of contact with the ladder (2 hands, 1 foot; 2 feet 1 hand)
7. If you must place a ladder over a doorway, barricade the door to prevent its use and post a warning sign.
8. Only one person is allowed on a ladder at a time.
9. Do not jump off a ladder when descending.
10. All ladder joints between steps, rungs, and side rails must be tight.
11. Safety feet must be in good working order and firmly in place.
12. Rungs must be free of grease and/or oil.

Step Ladder Rules	Straight Type or Extension Ladder Rules
<ol style="list-style-type: none"> 1. Do not place tools or materials on the steps or platform of a stepladder 2. Do not use the top two steps of a stepladder as a step or stand. 3. Always level all four feet and lock spreaders in place. 4. Do not use a stepladder as a straight ladder. 	<ol style="list-style-type: none"> 1. All straight or extension ladders must be extended at least three feet beyond the supporting object, when used as an access to an elevated work area.

Lifting Tasks

1. Plan the move before lifting; remove obstructions from your chosen pathway.
2. Do not lift on slippery surfaces.
3. Test the weight of the load before lifting by pushing the load along its resting surface.
4. If the load is too heavy or bulky, use lifting and carrying aids such as hand trucks, dollies, pallet jacks and carts, or get assistance from a co-worker.
5. If assistance is required to perform a lift, coordinate and communicate your movements with those of your co-worker.
6. Position your feet 6 to 12 inches apart with one foot slightly in front of the other.
7. Face the load.
8. Bend at the knees, not at the back.
9. Keep your back straight.

10. Get a firm grip on the object with your hands and fingers. Use handles when present.
11. Never lift anything if your hands are greasy or wet.
12. Wear protective gloves when lifting objects with sharp corners or jagged edges.
13. Hold objects as close to your body as possible.
14. Perform lifting movements smoothly and gradually; do not jerk the load.
15. If you must change direction while lifting or carrying the load, pivot your feet and turn your entire body.
16. Do not twist at the waist.
17. Set down objects in the same manner as you picked them up, except in reverse.
18. Do not lift an object from the floor to a level above your waist in one motion. Set the load down on a table or bench and then adjust your grip before lifting it higher.
19. Slide materials to the end of the tailgate before attempting to lift them off of a pick-up truck. Do not lift over the walls or tailgate of the truck bed.

Electrical Safety

Employees face potential electrocution hazards. To avoid electrical injuries, employees must remain vigilant in identifying and controlling electrical hazards. Management will provide guidance for employees, regarding which electrical hazards can be expected and which level of personal protection each hazard demands. Management will determine whether employees require additional training to safely operate equipment or perform their duties. If an employee requires further training, management will ensure that they get it before being allowed to carry out specific duties.

Engineering controls specific to working with electricity

1. All switches, breakers, junction boxes, and distribution panels will be completely enclosed.
2. Watertight enclosures will be used wherever an electrical component is at risk of being exposed to moisture.
3. Structural barriers will be installed to protect electrical components.
4. No exposed live parts will be accessible to regular workers.
5. Equipment will be properly grounded.

Administrative controls

1. Licensed contractors will be hired to perform electrical work.

2. Basic electrical safety and lockout training will be provided to employees who may service equipment.
3. Hazards will be reported and documented as soon as they are identified.
4. Safety signs and barriers will be used to inform employees of potential electrical hazards.

Process Controls

1. Plugs must not be overloaded.
2. Equipment will be handled in a manner that does not damage the equipment.
3. Portable cords and plugs will be inspected prior to use.
4. Do not let equipment overheat.
5. Do not use equipment with exposed wires or live parts.
6. Use non-conductive ladders.
7. Do not use equipment that has been exposed to moisture.
8. Maintain good housekeeping practices.

Respiratory Protection

Management shall ensure respirators are being worn to protect employees from exposure to air contaminants, organic and chemical, above the predefined exposure limit, or are otherwise necessary to protect employee health, and where respirators are voluntarily worn by employees for comfort or for other reasons.

1. Respirators will be selected for the particular task, with the appropriate rating.
2. Employees will be trained in the proper use of respirators.
3. Management will ensure that respirators fit employees and will test equipment on a regular basis.
4. Management will ensure proper cleaning, maintenance and repair or replacement of respiratory protective equipment and filters.
5. Management will ensure medical evaluations of employees required to use respirators are performed (OSHA re: asthma risk).
6. Management will ensure a constant flow of fresh air where possible.
7. Management will evaluate the respiratory protection program's effectiveness annually and adjust procedures to safeguard the health of all employees.

8. Respirators will be stored separately from pesticides.

Hazardous Gases

Air contaminants such as carbon dioxide (Co2), carbon monoxide, nitrogen and ozone require careful monitoring and management. Levels of Co2 and ozone (if used) will be monitored and an alarm will sound if a threshold is reached. Employees will evacuate the area immediately. Additionally, automatic vents will be set to clear the internal air until safe levels are reached. The malfunctioning equipment will be immediately identified and either repaired or removed from operation.

Carbon Dioxide

1. Co2 meters with alarms will be located inside the front door of the indoor grow building and at least two other locations in the building.
2. In the event Co2 levels reach above 2,000 ppm and the environmental control monitoring alarm goes off, leave the room immediately and notify the cultivation Director of Operations.
3. Emergency outtake fan switches will be located beside the Co2 meters.
4. An employee can only enter the room with the proper respiratory protection long enough to make sure outtake fans are functional.
5. Once the alarm has stopped and the all clear announcement is given, employees may re-enter the room.
6. Monthly review of the service tags on the Co2 machine and the environmental control system are to receive regularly scheduled maintenance.
7. Monthly checking of the connections to the carbon dioxide natural gas input valves for leaks and are properly sealed.

All Co2 alarms and evacuations, including false alarms, needs to be logged for investigation and future reference through an incident report.

Bloodborne Pathogen Control

The facility does not have designated full-time emergency first aid personnel. All managers, and other employees who elect to do so, will be trained in Bloodborne Pathogen (BBP)

control. The application of 1st Aid at the facility is done on a Good Samaritan basis; employees are not required to render 1st Aid.

If BBP-trained personnel are in a situation involving blood, they should:

1. Avoid skin contact with blood/other potentially infectious materials by letting the victim help as much as possible and by using gloves provided in the first aid kit.
2. Remove dirty clothing, etc. with blood on it after rendering help.
3. Wash thoroughly with soap and water to remove blood. A 10% chlorine bleach solution is good for disinfecting areas contaminated with blood (spills, etc.).
4. Report such incidents to supervisors immediately. The supervisor will fill out an incident report. Because of the involvement of blood, the report should include the names of all people physically exposed to the blood at the time of the accident.

Hepatitis B

Employees of Jolly Green are not expected to have exposure to Hepatitis B during the normal course of work activities. However, if an exposure incident occurs during work, employees will be evaluated and treated at the company's expense according to OSHA Standard 1910.1030(f).

See: <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.1030>.

Equipment Handling and Maintenance

Employees are responsible for ensuring that equipment is maintained and in proper and safe working condition. Equipment will be inspected and serviced routinely, to ensure that hazards are prevented. Management will schedule regular inspections that are posted and available to employees. Reports of damaged or defective equipment by staff will be investigated, and followed up by corrective action.

Management will ensure that employees who fix, service and maintain equipment possess specific training for each item they will be working on. Professional contractors will be used if no employees have the training to perform necessary maintenance on a piece of equipment.

Management may not allow any employee to use equipment without the necessary safety guards and barriers in place. Employees not involved in the work process will maintain a safe distance between them and the work area. Employees will keep files and records to document maintenance tasks for the life of the equipment.

Employees who handle equipment during the course of their duties will adhere to the following procedures:

1. Frequently inspect equipment for damage and defects.
2. Immediately remove defective equipment from service, and report the defect to management.
3. Equipment must be in good working condition before it may be used.
4. Equipment shall be used for its intended purpose only.
5. Disconnect equipment that is not in use.
6. Do not carry or disconnect equipment by the cord, or hose.
7. Inspect equipment before use.
8. Keep tools clean and sharp.
9. Keep good footing and maintain balance when using equipment.
10. Follow manufacturer instructions for the handling of specific equipment.
11. Do not wear loose or baggy clothing that can get caught in moving parts.
12. Damaged equipment must be labeled and stored separately from equipment in good working order.
13. Do not carry equipment in a manner that may cause the starting mechanism to be triggered. Do not hold finger over switch.
14. Take equipment out of service before cleaning, servicing, or maintenance. See the lockout procedure below.

Equipment Maintenance List: See [Appendix 7 - Equipment Maintenance List](#)

Lockout

This procedure establishes the minimum requirements for the lockout of energy isolating devices whenever maintenance or servicing is done on machines or equipment. It shall be used to ensure that the machine or equipment is stopped, isolated from all potentially hazardous energy sources and locked out before employees perform any servicing or

maintenance where the unexpected energization or start-up of the machine or equipment or release of stored energy could cause injury.

All employees are required to comply with the restrictions and limitations imposed upon them during the use of lockout. The authorized employees are required to perform the lockout in accordance with this procedure. All employees, upon observing a machine or piece of equipment which is locked out to perform servicing or maintenance shall not attempt to start, energize, or use that machine or equipment. Anyone who fails to follow this procedure will be subject to disciplinary action described in the Staffing and Training Plan.

If a piece of equipment receives its energy supply through a power cord plugged into a wall, and the equipment is in complete control of the employee, no lockout procedure is required. If a larger piece of equipment that plugs into the wall is to be serviced, a plug lockout device will be used to ensure that no other employee accidentally plugs the equipment back in while it is being maintained or repaired.

The following procedure applies to equipment that has an energy source other than a power cord.

Taking Equipment out of Service

1. Notification will be given to all affected employees that servicing or maintenance is required on a machine or equipment and that the machine or equipment must be shut down and locked out to perform the servicing or maintenance. All employees who work in the related department will be notified by the following means: an email sent to affected employees and a clearly visible notice attached to all entrances to the department and attached to or immediately near the equipment. The notice will include the following information:
 - What is going to be locked/tagged out
 - Why it is going to be locked/tagged out
 - For approximately how long will the system be unavailable
 - Who is responsible for the lockout/tagout
 - Who to contact for more information

2. The authorized employee will refer to the company procedure to identify the type and magnitude of the energy that the machine or equipment utilizes, will understand the hazards of the energy, and will know the methods to control the energy. The type(s) and magnitude(s) of energy found on the premises, its hazards and the methods to control the energy are described below for each piece of equipment.

Equipment:		Completed by:	Date:
Check if Present	Type of Energy	Magnitude*	Method of Control
	Electrical - low (<50 V)		
	Electrical - medium (50-600 V)		
	Electrical - high (>600 V)		
	Chemical - flammable, pressure, extreme heat, fire, corrosive, toxic, etc.		
	Mechanical - capable of crushing, pinching, cutting, snagging, striking		
	Thermal - high temperature-surface temperature, hot liquids, steam Liquids or gases > 125°F (52°C) Surfaces ≥ 140° F (60°C)		
	Emergency power - does the equipment maintain an emergency power /uninterruptible power supply?		

* List exact amperage if electrical or highest potential temperature if thermal.

3. If the machine or equipment is operating, shut it down by the normal stopping procedure (depress the stop button, open switch, close valve, etc.). The following equipment is turned on and off at a location different from the equipment itself:

Equipment	Room	Switch/Power Location

- Deactivate the energy isolating device(s) so that the machine or equipment is isolated from the energy source(s). Examples: manually operated electrical circuit breaker; a disconnect switch; a manually operated switch by which the conductors of a circuit can be disconnected from all ungrounded supply conductors, etc.
- Lock out the energy isolating devices with assigned individual lock.
- Stored or residual energy (such as that in capacitors, springs, elevated machine members, rotating flywheel, hydraulic systems, and air, gas, steam, or water pressure, etc.) must be dissipated or restrained by methods such as grounding, repositioning, blocking, bleeding down, etc.

Equipment	Room	Type of Energy	Method of Dissipation/Restraint

- Ensure that the equipment is disconnected from the energy source(s) by first checking that no personnel are exposed, then verify the isolation of the equipment by operating the push button or other normal operating control(s) or by testing to make certain the equipment will not operate. **Caution:** Return operating control(s) to neutral or "off" position after verifying the isolation of the equipment.

Restoring Equipment to Service

- Check the machine or equipment and the immediate area around the machine to ensure that nonessential items have been removed and that the machine or equipment components are operationally intact.

2. Check the work area to ensure that all employees have been safely positioned or removed from the area.
3. Verify that the controls are in neutral.
4. Remove the lockout devices and reenergize the machine or equipment. **Note:** The removal of some forms of blocking may require re energization of the machine before safe removal.
5. Notify affected employees that the servicing or maintenance is completed and the machine or equipment is ready for use.

Heat Stress

1. Employees will learn the signs and symptoms of heat-related illness.
2. Workers should avoid alcohol or drinks with caffeine before or during work in hot weather.
3. Supply adequate water and encourage workers who work in hot weather to drink regularly, **even when not thirsty. A small amount of water every 15 minutes is recommended rather than a large amount after hours of sweating.**
4. Schedule the most strenuous work during the cooler parts of the day.
5. Adjusting to work in heat takes time. Allow workers to acclimatize. Start slow and work up to your normal pace.
6. Wear lightweight, loose-fitting, light-colored, breathable (e.g. cotton) clothing and a hat.
7. Allow workers to take regular breaks from the sun. Loosen or remove clothing that restricts cooling.
8. Watch coworkers for symptoms of heat-related illness. This is especially important for non-acclimatized workers, and for all workers during heat-wave events.
9. If exertion causes someone's heart to pound or makes them gasp for breath, become lightheaded, confused, weak or faint, they should STOP all activity and get into a cool area or into the shade, and rest.
10. Heat Exhaustion/Heat Stroke Chart should be placed in a conspicuous place.
11. Managers will familiarize themselves with the Heat Stress Checklist.

Heat Stroke or Heat Exhaustion? How do you tell the difference?

The difference is mental confusion or disorientation in ALL heat stroke victims

Ask these 3 questions:

What is your name? What day is this? Where are we?

If a worker can't answer these questions, assume it is heat stroke.

Contact 911 immediately.

HEAT STRESS CHECKLIST

1. Does the worksite have temperature extremes (above 85 degrees in higher humidity or above 90-95 degrees in lower humidity) that may cause heat stress?
2. Are employees doing heavy labor and/or wear heavy protective clothing?
3. Do employees have access to cool drinking water at all times?
4. Are employees allowed work breaks during prolonged heavy labor?
5. Do employees have access to shade during breaks?
6. Have employees been trained on the symptoms of heat-related illness (heat exhaustion and heat stroke)?
7. Are employees trained on first aid measures for heat-related illness?

Hearing Protection

If a piece of equipment is used that has a noise level that prevents workers from having a normal conversation, either a decibel meter will be purchased or a specialist brought in to determine if a hearing conservation plan needs to be implemented.

Jolly Green will follow the recommendations of the Occupational Noise Exposure Standard, <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.95>, if a plan is needed.

If an employee believes that a noise level on the premises may cause a hazard that has not yet been investigated, he/she is encouraged to fill out a Hazard Report Form.

Horticultural lighting Eye Protection

Management shall ensure UV eye protection are being worn to protect employees from exposure from Led horticultural lighting. This is necessary to protect employee health and comfort while working when the horticultural lighting is on. UV rated eye protection will be selected for the particular task, with the appropriate rating.

1. Employees will be trained in the proper use of UV eye protection.
2. Management will ensure that UV eye protection fit employees and will test equipment on a regular basis.
3. Management will ensure proper cleaning, maintenance and repair or replacement of UV eye protection equipment.
4. Management will ensure evaluations of employees required to use UV eye protection are performed (OSHA re: eye risk).
5. Management will ensure a constant non-UV lighting where possible.
6. Management will evaluate the UV eye protection program's effectiveness annually and adjust procedures to safeguard the health of all employees.

UV eye protection will be stored at the main entrance to the cultivation facility and in the main office.

Poisoning

(Poison Control: (1-800-222-1222))

Swallowed Poisons

If the two items below are true, drink a small amount of water or milk immediately, before getting Poison Control help:

- The product swallowed is burning, irritating or caustic, AND
- The person is conscious, not having convulsions, and able to swallow.

Poison Contact with the Eye

It's important that you irrigate (rinse the exposed eyes) immediately. Every second matters and a delay could result in loss of sight. Remove contact lenses. Use lots of room temperature water and irrigate for at least 15 to 20 minutes.

Options for rinsing eyes include getting in a shower, holding the head sideways under the faucet at a sink, or slowly pouring water from a pitcher. Let the water hit the bridge of the nose and gently run into the eyes rather than pouring the water directly into the eye. Important: Irrigate for at least 15 to 20 minutes. Encourage blinking.

After the 15 to 20-minute irrigation, let the eye rest while you call Poison Control (1-800-222-1222) for additional guidance. If irritation, pain, visual problems, redness, swelling, or tearing persist an hour after irrigation is started, you'll need an urgent ophthalmic exam. That means a trip to an urgicenter or emergency room right away, unless an eye doctor can see you immediately. If the symptoms are severe, don't wait an hour - go straight to an emergency room after irrigating.

Under less severe circumstances, go to the site

<https://triage.webpoisoncontrol.org/#/exclusions> to get specific recommendations.

Poison Contact with the Skin

It's important that you rinse the exposed skin immediately. Remove contaminated clothing first. Every second matters. Don't delay. Use lots of room temperature running water and rinse for at least 15 minutes. For large spills, a shower should be used if available. Mild hand soap can be used to gently remove material that sticks to the skin. Important: Rinse for at least 15 minutes.

After the 15 minute rinse, call Poison Control (1-800-222-1222) for additional guidance. They will be able to advise if additional treatment is necessary. If blistering, large or deep burns, pain, redness, or swelling worsen or persist, the employee will need to see a doctor right away. If the symptoms are severe, go straight to an emergency room after rinsing. Don't wait.

Under less severe circumstances, after irrigating, go to the site <https://triage.webpoisoncontrol.org/#/exclusions> to get specific recommendations, or call Poison Control for guidance.

Inhaled Poison

It's important that you move to fresh air immediately. Stay away from all toxic fumes and gases. Thoroughly ventilate the involved area.

After moving to fresh air, go to the site <https://triage.webpoisoncontrol.org/#/exclusions> to get specific recommendations, or call 1-800-222-1222 for guidance.

See <https://www.poison.org/need-immediate-assistance> for additional information.

Mechanical Equipment

Mechanical equipment, tools and other machines have the potential to pose hazards to users including pinch points, wrap points, shear points, crush points, pull-in points, and the potential for objects to be thrown from equipment.

- Pinch Points— Where two parts move together and at least one of the parts moves in a circle; also called mesh points, run-on points, and entry points. Examples include: belt drives, chain drives, gear drives, and feed rolls. When shields cannot be provided, operators will avoid contact with hands or clothing in pinch point areas. Never attempt to service or unclog a machine while it is operating or the engine is running.
- Wrap Points— Any exposed component that rotates. Examples include: rotating shafts, such as a PTO shaft, or shafts that protrude beyond bearings or sprockets. Watch components on rotating shafts, such as couplers, universal joints, keys, keyways, pins, or other fastening devices. Splined, square, and hexagon-shaped shafts are usually more dangerous than round shafts because the edges tend to grab fingers or clothing more easily than a round shaft. However, round shafts may not be smooth and can also grab quickly. Once a finger, thread, article of clothing, or hair is caught it begins to wrap; pulling only causes the wrap to become tighter.

- Shear Points– Where the edges of two moving parts move across one another or where a single sharp part moves with enough speed or force to cut soft material. Remember that cutting devices cannot be totally guarded to keep hands and feet out and still perform their intended function. Recognize the potential hazards of cutting and shear points on implements and equipment that are not designed to cut or shear. Guarding may not be feasible for these hazards.
- Crush Points– Points that occur between two objects moving toward each other or one object moving toward a stationary object. Never stand between two objects moving toward one another. Use adequate blocking or lock-out devices when working under equipment.
- Pull-In Points– Points where objects are pulled into equipment, usually for some type of processing. Machines are faster and stronger than people. Never attempt to hand-feed materials into moving feed rollers. Always stop the equipment before attempting to remove an item that has plugged a roller or that has become wrapped around a rotating shaft. Remember that guards cannot be provided for all situations - equipment must be able to function in the capacity for which it is designed. Freewheeling parts, rotating or moving parts that continue to move after the power is shut off, are particularly dangerous because time delays are necessary before service can begin. Allow sufficient time for parts to stop moving.

General safety guidelines include the following:

1. Users will be trained on the piece(s) of equipment and should not work alone.
2. Machine guarding will be in place and functioning properly. Report machine guarding problems to supervisors immediately.
3. Loose clothing may NOT be worn around equipment.
4. Dangling jewelry (e.g., necklaces, earrings, non-breakaway lanyards) will be removed when around equipment.
5. Long hair will be tied back and secured.
6. Appropriate personal protective equipment will be utilized including eye, face, and/or hearing protection (if required).

When a new piece of mechanical equipment is purchased that is not identical to an existing piece of equipment, a new JHA will be conducted before the equipment is put into use.

Bio-contamination

Mold exposure in the workplace leads to employee health concerns and odor control issues. Moisture control and ventilation are key elements in mold prevention. Employees must prevent moisture accumulations where they occur and ensure that the HVAC is operational and running properly.

Mold exposure exhibits certain physical symptoms that can allow employees and managers to identify and eradicate possible mold outbreaks. Possible symptoms of mold exposure include:

1. Allergic reactions
2. Hay-fever
3. Asthma attacks
4. Skin, eye and nose irritation

The more extensive or severe the dampness and mold, the greater the risk of health effects. The health effects also depend on the susceptibility of the employees.

Bio-contamination Prevention and Remediation

Mold/Mildew Prevention
<ol style="list-style-type: none">1. Store clothing and other materials used in more humid environments in a location with low humidity.2. Maintain good air circulation.3. Repair leaks in plumbing or the facility structure.4. Clean and dry all condensation and/or wet spots. Fix the source of moisture, if possible.5. Regular facility inspections and maintenance, including plumbing, HVAC, and environmental monitors.6. Keep HVAC drip pans clean and flowing.7. Maintain humidity levels between 25% and 60%.8. Ensure the facility has adequate drainage ducts to prevent water from accumulating.9. Identify problem areas and prevent moisture sources from reappearing.

Remediation

1. Identify conditions that permit growth
2. Assess the extent of mold infestation, damaged materials and moist conditions.
3. Take steps to permanently fix moisture problems.
4. Moldy materials will be removed in a manner that prevents further contamination.
5. HVAC systems suspected of mold contamination will not be switched on.

Additional information: <https://www.osha.gov/dts/shib/shib101003.html>

Sanitation and Safety Procedures Specific to Cultivation Activities

Trimming Equipment/Blades/Scissors

The following set of procedures are to be followed when dealing with equipment that carry a potential safety hazard:

1. Training employees on the proper use of equipment with exposed rotating, cutting or pinching hazards, to process and destroy waste plant products.
2. Store sharp objects like pens, pencils, letter openers or scissors in drawers or with the point facing down in a container.
3. When handing a tool to another person, direct sharp points and cutting edges away from yourself and the other person.
4. When using knives or other cutting tools, cut in a direction away from your body.
5. Do not carry sharp or pointed hand tools such as screwdrivers, clippers, snips, scrapers, chisels or files in your pocket unless the tool or pocket is sheathed.
6. Do not carry tools in your hand when climbing. Carry tools in tool belts or hoist the tools to the work area with a hand line.
7. Do not throw tools from one location to another, from one employee to another, from scaffolds or other elevated platforms.
8. Transport hand tools in tool boxes or tool belts.

Pruning

Plants are pruned during various stages of the cultivation process in order to ensure that the plants are well aerated, uncrowded, and dominant branches are trained to produce consistently-sized flowers. Pruning will occur regularly throughout the vegetative and flowering stages of growth.

Procedures:	Required PPE:
<ol style="list-style-type: none">1. Use approved cutting tools.2. Cut one stem at a time.3. Never pull a knife blade toward you.4. Pay attention to where your fingers are in relation to where you are cutting.5. Do not use razor blades.	<ol style="list-style-type: none">1. Eye Protection2. Gloves3. Long Sleeves

Plant Room Cleaning

Plant rooms are cleaned each time a batch of plants moves to the next phase of growth, which is done to prevent any possible pests or microbes from contaminating the next batch of plants.

Procedures:	Required PPE:
<ol style="list-style-type: none">1. All surfaces are sprayed and wiped down with a bleach or adequate cleaning solution.2. PPE must be worn at all times.	<ol style="list-style-type: none">1. Eye Protection2. Gloves3. Protective Outerwear4. Respirator

Plant Container Washing

Pots and soil containers will be washed and cleaned between transplants and harvests.

Procedures:	Required PPE:
<ol style="list-style-type: none"> 1. Remove all growing media from the container. 2. Rinse container with clean water. 3. Soak container in bleach or disinfectant solution. 4. Rinse with clean water a second time. 	<ol style="list-style-type: none"> 1. Eye Protection 2. Gloves 3. Protective Outerwear

Dry Room Cleaning

Dry rooms are cleaned at set intervals before a harvested crop is moved into the room. Sanitizing the room prevents contamination by possible pests and microbes from previous batches.

Procedures:	Required PPE:
<ol style="list-style-type: none"> 1. All walls and surfaces are sprayed and wiped down with a bleach solution or another disinfectant. 2. All equipment that comes into direct contact with the harvested batch will be cleaned with bleach. 3. Ensure that the room is well ventilated and that HVAC equipment is operational. 4. Do not get moisture on electrical plugs or equipment. 	<ol style="list-style-type: none"> 1. Eye Protection 2. Gloves 3. Protective Outerwear 4. Respirator

Post-Harvest Cleaning

After a harvest all surfaces in the flower room will be cleaned and sanitized before new plants may enter.

Procedures:	Required PPE:
<ol style="list-style-type: none"> 1. Remove any plant and soil materials from previous harvest. 	<ol style="list-style-type: none"> 1. Eye Protection 2. Gloves

<ol style="list-style-type: none"> 2. Remove plant equipment from previous harvest, such as netting, drip emitters, or pots, and clean them in a different area. 3. Sweep the floor. 4. Clean the floor by mopping it with bleach, or a disinfectant solution. 5. Wipe down all walls and surfaces in the room with a diluted solution of bleach. 6. Clean and replace lights and lighting equipment. 7. Ensure that the room is well ventilated and that HVAC equipment is operational. 8. Do not get moisture on electrical plugs or equipment. 	<ol style="list-style-type: none"> 3. Protective Outerwear 4. Respirator
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Mixing Salt-based Fertilizers

Nutrient salts, or pH buffers may cause irritation to the skin or eyes if direct contact occurs, or cause discomfort when inhaled.

Procedures:	Required PPE:
<ol style="list-style-type: none"> 1. All nutrient salt mixtures needs to be mixed Mix products in a well ventilated area. 2. Gloves are to be worn at all times during mixing and application process. 3. Eye protection is to be worn at all times when dealing with nutrient salts. 4. A respirator is to be worn at all times when handling nutrient salts. 5. Immediately wash away any spillage that may have occurred. 	<ol style="list-style-type: none"> 1. Goggles 2. Gloves 3. Respirator 4. Long sleeves

Plant Waste Grinder/Shredder

Preparation

1. Do not leave equipment unattended and in the vicinity of bystanders.

2. Wear ear protection and safety glasses at all times while operating the machine.
3. Avoid wearing clothing that is loose fitting or has hanging cords or ties.
4. Check for damaged parts, alignment, movement and free running of moving parts. As well as breakage of parts, mounting and any other conditions that may affect the operation.

Operation

1. Before starting the machine, look into feeding chamber to make certain that it is empty.
2. Keep face and body away from the feed intake opening.
3. Do not allow any other body part or clothing inside the feeding chamber, discharge chute and/or near any moving parts.
4. Keep proper balance and footing at all times, do not overreach. Never stand at a higher level than the base of the machine when feeding material into it.
5. Always stand clear of the discharge zone when operating this machine.
6. When feeding material into the machine, be extremely careful that pieces of metal, rocks, bottles, cans or other foreign objects are not included.
7. If the cutting mechanisms strike any foreign object or if the machine should start making any unusual noise and vibration shut off the power source and allow the machine to stop.

Disconnect the unit from the main supply and take the following steps:

1. Inspected for damage.
2. Check for and tighten any loose parts.
3. Have any damaged parts replaced or repaired.
4. Do not allow processed material to build up in the discharge zone, this may prevent proper discharge and can result in kickback of material through the feed intake opening.
5. If the machine becomes clogged, shut off the power and disconnect the unit from the main supply before clearing debris.
6. Keep the power source clear of debris and other accumulations to prevent damage to the power source and/or fire.
7. Keep all guards and deflectors in place and in good working condition.
8. Do not transport this machine while the power source is running.
9. Shut off the power and disconnect the unit from the main supply whenever you leave work area.
10. Do not tilt the machine while the power source is running.

Pull the plug from the socket:

1. Whenever you leave the machine
2. Before clearing a blockage
3. Before checking, cleaning, or working on the machine
4. After striking a foreign object, in which case inspect the machine for damage and make repairs as necessary

Repetitive Cultivation Tasks

Repetitive tasks occur during all stages of cultivation and employees engaging in repetitive tasks or working in a crouched position must take regular breaks and stretch arms, legs and fingers. An employee will notify his/her supervisor immediately upon noticing discomfort so that steps can be taken to prevent further injury, such as purchasing tools or other equipment to minimize strain.

Some of these repetitive tasks may occur when:

1. Conducting plant inspections
2. Trimming/cutting
3. Lifting/moving plants
4. Watering plants

Pesticides

Detailed information about pest identification, treatment and pesticide application and handing is located in the [Pest Management/Pesticide Control Plan](#)

Use of pesticides on cannabis is generally allowed if they are also intended for consumable food products according to state and federal standards. State guidelines will be checked to find the list of allowed and banned substances. All unlisted products will be considered illegal until specific permission for use has been obtained from county or state agriculture departments.

Employees may become exposed to pesticides during their duties. The Environmental Protection Agency's Worker Protection Standards intends to prevent exposure to pesticides.

Pesticide handlers are people who mix, load, apply or work with pesticides during the course of their daily duties. They may also enter treated areas during Restricted Entry Interval (REI), before safe inhalation exposure levels have been reached, to perform duties such as flagging, ventilation operation, air level monitoring, and adjusting pesticide equipment. Handlers will have been trained to use pesticides safely. An employee's training and qualifications will be verified by the cultivation Manager prior to he/she performing pesticide-related tasks.

A handler will apply a pesticide strictly according to the instructions on its Safety Data Sheet, using PPE if required by the SDS. Product labels will be read and referenced by the handler before pesticides are applied. Handlers will have access to product labels.

An additional source of information is the Pesticide Environmental Stewardship site: <https://pesticidestewardship.org/>.

Employee Notification

Employees will be informed of all pesticide applications. Employees will receive verbal notification, in a manner that they understand, of:

1. The location of treated area
2. The duration of the REI
3. Warnings not to enter treated area until REI has passed

Signage will be posted on all entrances to treated areas.

Management will post the details of each pesticide application performed within the previous 30 days. Information will include product name, EPA registration number, active ingredients, location, time of application and REI.

Emergency Action Plan (EAP)

The Security Manager is primarily responsible for implementing this emergency plan, particularly the portions that involve contact with emergency responders. All new employees will be trained on the plan and where to access a written and electronic copy. The Facilities Manager is responsible for managing the evacuation component of this plan and portions that involve property damage.

In the case of any emergency, all documents resulting from the event and receipts and other records related to associated expenses will be collected by the Security/Facilities Manager, as appropriate. A summary of the incident and an expense report will be provided to senior management within 60 days of the event.

If cash is on the premises, all cash drawers and/or office doors will be locked upon leaving the area to deal with an emergency.

Engineering Controls for Emergency Response

1. A silent alarm for use during an armed robbery.
2. An audible panic alarm to indicate the need for evacuation and a call to 911.
3. A notification system generating a sound, text, or visual signal when the alarm/surveillance system malfunctions.
4. These engineering controls will remain operational during a power outage.

Evacuation

This section on Evacuation is repeated in the Comprehensive Security Plan.

See <https://www.osha.gov/SLTC/etools/evacuation/evac.html> and <https://www.osha.gov/Publications/OSHA3088.pdf> for additional resources and tools to help plan for evacuations.

Jolly Green will have a designated assembly location at least 150 ft away in case of incidents that require evacuation.

An orderly evacuation will be supervised by the Facilities Manager who will check all rooms and report any problems to the Premises Manager.

The Premises Manager is responsible for the safe evacuation of disabled employees.

Whenever the alarm is triggered, staff will follow the relevant evacuation procedures required by the type of emergency.

Employees will leave the affected area immediately by the primary emergency routes posted in their work areas unless the route is blocked. In the event of the primary route being blocked, staff will follow the secondary route, or an alternative route designated by the Facilities Manager.

Employees required to evacuate will proceed to the predetermined assembly points.

Depending on the nature of the emergency and response required, non-critical employees will not be permitted to enter the facility or affected work areas, unless the “all clear” has been given by the Facilities Manager.

Random, full evacuation drills for all employees will be held on a regular basis. The Facilities Manager is responsible for conducting drills and recording their outcomes and results. Related records will be forwarded to the Record Keeping Manager.

Evacuation Routes

All primary emergency escape routes and designated assembly locations will be approved by the Facilities Manager. The Emergency Exit Diagram will be posted in several locations throughout the building.

Accounting for Employees After an Evacuation

After employees have evacuated and arrived at their designated assembly areas, the Facilities Manager or his/her designee will take a headcount.

The will account for any employees that are not present by determining their names, condition, last known locations and possible locations. The Facilities Manager will relay the following information to managers in a timely manner:

1. Number of employees/non-employees that were on premises at immediately prior to evacuation
2. Number of employees/non-employees present at respective assembly areas
3. Number of employees/non-employees unaccounted for
4. Number of injured employees/non-employees
5. Number of employees conducting critical operations

In collaboration with the senior security staff member on the premises, the Facilities Manager will notify emergency responders if someone has not arrived at the evacuation assembly location.

Emergency Response

Procedures related to the following types of incidents are described in the [Comprehensive Security Plan: Armed Robbery, Burglary and the Workplace Violence Policy](#).

Medical Emergency

Some of this section on Medical Emergencies is repeated in the [Comprehensive Security Plan](#).

A first aid kit is kept in each building and each company vehicle is equipped with a kit located in the glove box or under the driver's seat. Enough kits will be placed such that any employee can reach a kit in under one minute. These kits are checked quarterly by members of the Safety Committee. An inventory of each kit is taped to the inside cover of the box. If you are injured, promptly report it to any supervisor.

All managers are required to have CPR/1st Aid training from the American Red Cross or the American Heart Association. All employees will be encouraged to take CPR/1st Aid. The company will cover the cost of the course and time taken to complete it.

A list of currently trained managers and employees is posted on the safety bulletin board along with the expiration dates of their cards.

Employees MUST report all work-related injuries and accidents immediately to their manager. A manager will also be notified immediately if a non-employee is injured on the premises.

When calling 911, give the address of the business and state that the location is a cannabis facility, give your name and telephone number, and stay on the phone until the dispatcher ends the call.

Upon arrival of the emergency responder, the senior Security Staff Member should introduce him/herself, and inform them that a higher level manager is on the way (if applicable).

In case of serious injury, do not move the injured person unless absolutely necessary.	
<ol style="list-style-type: none">1. Call out for help.2. If there is no response, call 911.	
NOTE:	Only provide 1st Aid assistance to the level of your training.

The ranking manager on site during the event will record the incident on an Incident Report Form (Appendix 8) and submit it to a supervisor within 24 hours of the injury.

A list of individuals who should be notified of a serious incident and their contact information is available in Appendix 9.

Fire Prevention Plan

Jolly Green's Fire Prevention Plan, developed in coordination with the local Fire Department, can be found office.

Due to the site-specific nature of a Fire Prevention Plan and the need to coordinate with your local Fire Department, we do not include one in this document. The following information from OSHA can guide you in creating your own plan. Source: <https://www.osha.gov/SLTC/etools/evacuation/fire.html>.

FIRE PREVENTION PLAN REQUIREMENTS

"A fire prevention plan must be in writing, be kept in the workplace, and be made available to employees for review. However, an employer with 10 or fewer employees may communicate the plan orally to employees. [\[29 CFR 1910.39\(b\)\]](#)

At a minimum, your fire prevention plan must include:

- A list of all major fire hazards, proper handling and storage procedures for hazardous materials, potential ignition sources and their control, and the type of fire protection equipment necessary to control each major hazard. [\[29 CFR 1910.39\(c\)\(1\)\]](#)
- Procedures to control accumulations of flammable and combustible waste materials. [\[29 CFR 1910.39\(c\)\(2\)\]](#)
- Procedures for regular maintenance of safeguards installed on heat-producing equipment to prevent the accidental ignition of combustible materials. [\[29 CFR 1910.39\(c\)\(3\)\]](#)
- The name or job title of employees responsible for maintaining equipment to prevent or control sources of ignition or fires. [\[29 CFR 1910.39\(c\)\(4\)\]](#)
- The name or job title of employees responsible for the control of fuel source hazards. [\[29 CFR 1910.39\(c\)\(5\)\]](#)

An employer must inform employees upon initial assignment to a job of the fire hazards to which they are exposed. An employer must also review with each employee those parts of the fire prevention plan necessary for self-protection. [\[29 CFR 1910.39\(d\)\]](#)".

Fire Emergencies

This section on Fire Emergencies is repeated in the [Comprehensive Security Plan](#).

Before a Fire:

1. Instructors will ensure during employee training that all staff know the locations of fire extinguishers and how to use them.
2. Jolly Green will follow recommended procedures to prepare for emergencies that require evacuation, such as keeping doorways, corridors and egress paths clear and unobstructed; making sure that all electrical appliances and cords are in good condition and UL approved; not overloading electrical outlets; and using surge protected multi-outlet power strips and extension cords when necessary. Extension cords without surge protection will be avoided.
3. Fire extinguishers will be mounted and maintained according to regulations.
4. All doors to rooms containing hazardous materials will be clearly marked according to the [NFPA classification system](#).

It is the employee's responsibility to safely evacuate the facility as quickly as possible. Fire extinguishers will be placed in locations recommended by fire experts and mounted and maintained according to regulations. Employees are under no obligation to fight a fire with an extinguisher and are expected to evacuate when in danger. Once the building is clear, no one shall re-enter the building until after emergency responders have cleared the building and said it is safe to enter.

Fire Evacuation Procedure:

1. Persons aware of the fire will set off the panic alarm and begin evacuation.
2. Calmly announce verbally to employees that there is an emergency and that they must evacuate the building.
3. After announcing the emergency, remain calm and assist other employees out of the building if necessary and discourage any delay.
4. If you are occupied in a manner that prevents you from making a call, ask an individual who is leaving the building and understands the emergency to call 911 and describe the situation. The person calling will give the address of the business and state that the location is a cannabis facility, give his/her name and telephone

number, and stay on the phone until the dispatcher ends the call. The individual should notify managers seen along the way of the status of the call and allow a manager to take over working with emergency responders.

5. When evacuating, knock on all doors and check all rooms including bathrooms to make sure everyone is aware of the situation. If you put your hand on a door or door knob and find it warm or hot to the touch, do not open the door.
6. If there is smoke in the air, stay low to the ground, especially your head, to reduce inhalation exposure. Keep one hand on the wall to prevent disorientation and crawl to the nearest exit.
7. Move safely to the identified assembly point. Make sure to stay out of the way of emergency responders.
8. If the fire is small, a person on staff who is comfortable with the use of a fire extinguisher may try to put it out.
9. Never fight a fire alone. Never allow the fire to get between you and your exit - always maintain an escape route.
10. The Facilities Manager or his/her designee will monitor the designated assembly location and notify emergency responders if someone has not arrived at the evacuation assembly location.

Fire Extinguisher Use:

It is Jolly Green 's responsibility to educate employees on the principles and practices of using a fire extinguisher and the hazards associated with fighting small or developing fires. [\[29 CFR 1910.157\(g\)\(1\)\]](#) This education must be provided annually and when a new employee is first hired. [\[29 CFR 1910.157\(g\)\(2\)\]](#)

Employees who have been designated to use fire extinguishers as part of the emergency action plan, must be trained on how to use the fire extinguishers appropriately in the workplace. [\[29 CFR 1910.157\(g\)\(3\)\]](#) This training is a specialized form of education that focuses on developing or improving skills and it must be provided annually and when employees are first assigned these duties. [\[29 CFR 1910.157\(g\)\(4\)\]](#)

Using a Fire Extinguisher

The following steps should be followed when responding to an early-stage fire:

1. Identify a safe evacuation path before approaching the fire. Do not allow the fire, heat, or smoke to come between you and your evacuation path.
2. Based on training experience, find the closest fire extinguisher to the area where the fire has started that can be safely accessed. The most appropriate extinguisher for each work area will be supplied.
3. Discharge the extinguisher within its effective range using the P.A.S.S. technique (pull, aim, squeeze, sweep - see below for additional details).
4. Back away from an extinguished fire in case it flames up again.
5. Evacuate immediately if the extinguisher is empty and the fire is not out.
6. Evacuate immediately if the fire progresses beyond the early stage.

P.A.S.S.

1. **PULL**... Pull the pin. This will also break the tamper seal.
2. **AIM**... Aim low, pointing the extinguisher nozzle (or its horn or hose) at the base of the fire.
NOTE: Do not touch the plastic discharge horn on CO2 extinguishers, it gets very cold and may damage skin.
3. **SQUEEZE**... Squeeze the handle to release the extinguishing agent.
4. **SWEEP**... Sweep from side to side at the base of the fire until it appears to be out. Watch the area. If the fire re-ignites, repeat steps 2 - 4.

Chemical Spills

1. Employees will receive training on how to read Safety Data Sheets (SDSs), the types and locations of cleanup equipment, and where an employee should be taken for medical attention in a non-emergency situation.
2. Additional copies of SDSs will be filed in a main office in case access to the information is prevented due to a spill.
3. Management will post the phone number for the Poison Control Hotline in all areas where chemicals are used.

Chemical spills are divided into incidental spills and non-incidental spills. An incidental spill does not cause a health or safety hazard to employees or the environment. A non-incidental

spill requires a response effort from trained personnel brought in from outside the company. All chemicals that would require this higher level of response will be clearly marked.

In the event of an incidental spill:

1. Verbally notify all within hearing distance that a spill has occurred.
2. If safe to do so, stop further release of the chemical by shutting off valves, providing additional leak containment etc.
3. Refer to the SDS for hazard information.
4. Use the appropriate Personal Protective Equipment (PPE) described in the SDS.
5. Confine a liquid spill with spill pillows or similar devices, then place absorbent over the spilled material.
6. Confine dry spills with a tarp or plastic.
7. Collect the cleaned up material and the PPE into an appropriate plastic bag.
8. Contact the CCO for disposal, which will be conducted according to a Chemical Safety Plan or according to directions provided in the SDS.
9. All spills that require the use of clean-up supplies are to be reported to the CCO.
10. The CCO will ensure that clean-up supplies are reordered if necessary.

If the spill is on the skin or in the eyes:

1. The injured person should immediately tell a co-worker what has happened.
2. Move the affected person to a safe location.
3. Allow cool running water to gently wash over the skin or eyes for at least 15 minutes.
4. Remove clothing that has been contaminated.
5. The helping employee will consult the SDS to determine if medical attention may be necessary, or in more extreme cases call the Poison Control Hotline at 800-222-1222.
6. If medical attention is required, enlist help from others if necessary to get the employee to a medical facility, or call 911 if the employee is having trouble seeing, is in extreme pain, or has become unconscious.
7. If the employee is taken to a medical facility, take the SDS for the chemical that has been spilled.
8. If emergency response personnel are called in, give the responders the SDS for the chemical that has been spilled.
9. Advise a manager as soon as reasonably possible.

In the event of a non-incidental spill:

1. Employees will be trained according to the Waste Management Plan to identify hazardous chemicals and how to respond to spills according to the severity of the incident.
2. The CCO or CEO will be notified immediately and will determine if emergency responders will be notified.
3. Should employees be in danger due to a spill, they will evacuate the area and close doors to contain the dangerous environment.
4. If safe to do so, shut off sources of ignition to prevent a fire.
5. If there is more than one entrance, post employees at a safe distance to prevent accidental entrance into the room until emergency responders arrive and take over this task.

Earthquake

By planning and practicing what to do if an earthquake strikes, the facility employees can learn to react correctly and automatically when the shaking begins. During an earthquake, most deaths and injuries are caused by collapsing building materials and heavy falling objects, such as bookcases, cabinets and heating units. Learn the safe spots in each space of the facility. Participating in an earthquake drill will help employees understand what to do in case the Director of Operations is not with them during an earthquake.

The following protocol needs to be followed during an earthquake:

1. Exit the building if easily possible, and seek safe spaces away from buildings.
2. If you cannot exit, get under a sturdy table or desk and hold on to it.
3. If you're not near a table or desk, cover your face and head with your arms and / or stand or crouch in a strongly supported doorway.
4. Brace yourself in an inside corner of the building.
5. Stay clear of windows or glass that could shatter or objects that could fall on you.
6. Avoid congregating near doorways and entrances. Many people are injured at entrances of buildings by falling debris
7. If the lights go out, use a battery-operated flashlight. Don't use candles, matches or lighters during or after an earthquake. If there is a gas leak, these could cause an

explosion.

Hurricane and Tsunami Events

While severe weather will be continuously tracked, unless otherwise informed, all operations will continue as usual until notification from the governmental civil defense department. When the sirens are sounded, all Managers will immediately report to the main building conference room to receive further instructions on informing and guiding employees on the matter.

Prior to leaving, Managers shall ensure that:

1. The gas service to the building is shut off. A wrench is available at the rear entrance to turn off the gas shut-off valve outside the building. All Managers will be trained in the gas shut-off procedure.
2. All electric power is turned off at the circuit breakers, to prevent equipment damage in the event of a power surge or other electrical fault. Only emergency lights will continue to operate.
3. All personnel are cleared from the premises. Following shutdown and evacuation, no one may re-enter the premises until Civil Defense sounds the all-clear announcement.

Floods

In the event of fast rising water, follow the steps below and evacuate the building to get to high ground:

Prior to leaving, Managers shall ensure that:

1. Immediately notify management.
2. Turn off all electricity and gas at the mains.
3. Set all equipment, computers and appliances to OFF position this is to prevent any damage that could happen once the power comes back.
4. Ensure that all hoses and irrigation valves are in the OFF position.
5. Managers will gather employees on high ground until emergency services arrive.

Unforeseen Weather Conditions and Blizzards

Unforeseen weather conditions could impact operational functions like power supply, data and communication lines and water and gas supply. Snow, rain and other weather issues may make it unsafe for employees to come to work.

1. Decisions to close the premises due to bad weather or other disaster will be made by Jolly Green.
2. Jolly Green will develop a system to contact employees if a business closure must occur.
3. Exempt employees will be paid in full if Jolly Green chooses to close down the premises. If an exempt employee works part of a full day before the closure is announced, he/she will receive a full day's pay. If Jolly Green keeps the premises open during bad weather and an employee does not come in, Jolly Green isn't legally obligated to pay the employee.
4. The cultivation facility never closes due to the fact that plants need daily care. There are several cots and sleeping bags available in the house room in the event there is a weather-related issue preventing employees from either arriving or leaving.]

Lightning Strikes

1. Lightning can cause power outages, building damage, fire, and potential harm to humans. The building is protected and grounded to minimize such potential harm. Call

the Director of Operations in the event of any emergency.

2. Reset electrical trip switches if the danger has passed.

Roof Leaks

1. Cover products and equipment with plastic.
2. Place empty trash cans under leaking areas.
3. Elevate merchandise off the floor to at least a pallet height.
4. Notify the Facilities Manager.
5. Rope off damaged areas.
6. If there is water in the building:
 - o Make sure there are no electrical hazards and products have not been contaminated.
 - o Push water out of building with squeegees, brooms, or sweeper/scrubbers.

Power Outage

In the event of a power or electrical outage

1. Immediately notify management.
2. If no delay systems or surge protectors are in place, turn off all HPS or metal halide grow lights, as the voltage may fluctuate and damage any lights that are on.
3. Set all unprotected equipment, computers and appliances to OFF position this is to prevent any damage that could happen once the power comes back.
4. Keep all refrigerated area doors closed.
5. Ensure that all hoses and irrigation valves are in the OFF position.
6. Supervisors will gather employees in the front yard until the power is back on, or until another decision is made.

Emergency Equipment Locations

Fire Extinguishers and First Aid Kits

Emergency Lighting

Emergency Washing Facilities

Emergency Incident Reporting

After an emergency event occurs, a manager will complete an Incident Report Form (Appendix 8). A copy of the form will be sent to upper management, the Safety Committee and the Record Keeping Manager.

Safety Training

Proper training plays an essential role in the effective implementation of this program. The Chief Compliance Officer will oversee employee training and implement a training program that effectively keeps track of each employee's progress. The program's purpose is to educate employees about the Health and Safety procedures of the facility. Management is mandated to require all employees to participate in this program, including executive staff, managers, supervisors and employees.

Safety Training Program Development

All employees will be instructed in safe working practices at the beginning of their employment. Employees will be trained before they start a task or use equipment that may involve hazards.

In addition to topics previously referred to in this plan, training materials may be developed according site-specific criteria. Such criteria may be based on workplace hazards, data from accidents, or from incident reports.

The training coordinator will:

1. Ensure that employees receive training for tasks and equipment that require training.
2. Verify that employees have received the initial safety orientation.
3. Train employees on:
 - Reporting hazards and accidents
 - Emergency and evacuation procedures
 - Good housekeeping
4. Ensure that employees receive training on topics covered on the Mandatory Safety Training List (Appendix 10).
5. Schedule training sessions and meetings on a regular basis to meet employee training demands.
6. Document each employee's training and forward records to the Record Keeping Manager.

Critical Shutdown Procedures

1. Managers of each department, in cooperation with the Facilities Manager, will determine what equipment must be shut down in each type of emergency.
2. The Critical Shutdown Procedure Assignments (Appendix 11) will be kept and reviewed annually to determine if changes need to be applicable personnel responsible for the processes.
3. Employees will be trained in group sessions regarding any critical process shutdown procedures that may be necessary in the event of an emergency that affects their work area.
4. Procedures will also be posted near the equipment that needs to be shut down.
5. In the event that a critical process cannot be shut down or requires a substantial time delay to shut down, the employee responsible for shutting down the process will notify the Facilities Manager after exiting the building and reaching a safe distance.

Emergency Response Training

Employees will be prepared for crisis situations in order to minimize harm during an emergency. All employees will be trained in workplace emergency procedures. Employees with specific responsibilities during emergencies will receive additional training to conduct their duties safely and efficiently.

Drills and Emergency Exercises

Management will use drills and emergency exercises to support emergency response training. Findings by management will be used to take remedial action and make the necessary improvements to the emergency program.

1. A fire drill will be conducted during the **[1st]** week of **[January]**.
2. An earthquake drill will be conducted during the **[2nd]** week of **[February]**.

Other emergency drills will be conducted as needed.
All employees on the premises at the time of the exercise
are required to participate.

PPE Training

Employees will be trained in the following:

1. Where on an SDS form the PPE requirements are found
2. Where PPE may be found in the work area
3. How to inspect PPE before use
4. How to use PPE properly for each task involving hazardous chemicals
5. How to take PPE out of service if it is not working properly
6. Who to notify if flawed PPE is identified or if PPE needs to be reordered
7. The importance of notifying a supervisor if an employee has been asked to do a hazardous task without having been trained in the proper use of related PPE.

Pesticide Safety Training

Company's practices and procedures related to pesticide safety and training are detailed in the Pest Management/ Pesticide Control Plan.

Toolbox Trainings

Supervisors are encouraged to carry out Toolbox Trainings on a regular basis. A Toolbox Talk is an informal group discussion that focuses on a particular safety issue. These tools are used weekly or on an adhoc basis to promote a safety culture. Toolbox Talks are also intended to facilitate health and safety discussions on the job site.

Employee Orientation Checklist

Each employee will be given a safety orientation by his/her immediate supervisor when first hired, covering the basic topics in this plan.

Policy Review

Upper management will ensure that annual meetings occur to allow the Safety Committee to adequately review and revise the Health and Safety Program. The committee will review records of injuries, reported hazards, near misses, evacuation results, incidents and other relevant information in order to measure improvement or decline in the success of the program from one year to the next.

Improvements will be implemented when possible to work procedures, checklists, engineering and administrative controls, training modules, etc. to ensure that risks are reduced.

Once the review has been completed, the results will be reported to employees at an All-Hands Safety Meeting. This will be an opportunity to describe revisions and amendments to the safety program and solicit additional employee input.

Disciplinary Policy

Employees are expected to exercise good judgment when doing their work and to follow safety procedures. The Health and Safety Program cannot be effectively enforced without a disciplinary policy to provide appropriate consequences for failure to follow safety procedures. Disciplinary actions are designed to correct unsafe practices and incentivize employees to conform to protocols and procedures by deterring future violations, thereby fostering a culture of safety and ensuring even handed accountability throughout the organization.

Management is responsible for effectively enforcing the disciplinary policy in a manner that is fair, non-discriminatory and consistent. [Company]'s policy regarding this matter is detailed in the Employee Handbook.

Incident Reporting and Investigation

Incident reporting and investigation provides a valuable tool to ensure and improve workplace safety. Having access to statistical records of previous incidents allows management to identify and evaluate potential hazards and injuries before they occur.

Incident Reporting Procedure

Employees will cease work immediately after being involved in an accident or having incurred an injury, and will notify a supervisor in order to initiate the reporting process. If the employee is unable to notify the supervisor, another employee will be directed to do so.

Incident Investigation Procedure

The ranking member of employees at the location where the accident occurred will ensure that an Incident Report Form (Appendix 8) is completely filled out as soon as reasonably possible. Additionally, any recommendations associated with protocol change meant to prevent similar future injuries be addressed in a timely manner.

Managers will investigate all accidents and major injuries in order to fully determine all factors involved with the accident, and whether or not they can be prevented in the future. Guidelines recommended by OSHA will be used to conduct an investigation (<https://www.osha.gov/dcsp/products/topics/incidentinvestigation/index.html>).

Appendices

Appendix 1 - Job Hazard Analysis Form

<i>Job Title:</i>	<i>Job Location:</i>	<i>Analyst</i>	<i>Date</i>
<i>Task #</i>	<i>Task Description:</i>		
<i>Hazard Type:</i>	<i>Hazard Description:</i>		
<i>Consequence:</i>	<i>Hazard Controls:</i>		
<i>Rational or Comment:</i>			

A PPE Assessment Form should also be completed as part of this analysis.

For examples of how to fill out this form, see pages 9-11 of <https://www.osha.gov/Publications/osh3071.pdf>

Appendix 2 - Hazardous Chemical List - SDS

Chemical / Trade Name	Active Ingredient	PDF Link to SDS
Azamax - Neem Oil Extract	Azadirachtin A&B	See Safety Data Sheet: AzaMaxMSDS.pdf
Clorox® Regular Bleach	Sodium hypochlorite	See Safety Data Sheet: cloroxregular-bleach12015-06-12.pdf
Dip'N Grow® Liquid Rooting Concentrate	Indole-3-butyric acid, 1-Naphthalene Acetic acid	See Safety Data Sheets: dipngrow-dg01601-msds.pdf
Dyna-Gro pH Down	Phosphoric acid	See Safety Data Sheets: MSDS pH-Down.pdf
Dyna-Gro pH Up	Potassium Hydroxide, Potassium Carbonate	See Safety Data Sheet: MSDS pH-Up.pdf
Dyna-Gro Pro-TekT The Silicon Solution	Potassium Silicate	See Safety Data Sheet: MSDS%20Pro-TekT.pdf
Evergreen Pyrethrum Concentrate	Pyrethrins	See Safety Data Sheet: EverGreen Pyrethrum Concentrate MSDS.pdf
Flying Skull Nuke 'Em	Citric Acid	See Safety Data Sheet: NukeEm-SDS.pdf
Gnatrol WDG Biological Larvicide	Bacillus thuringiensis subsp. israelensis	See Safety Data Sheet: 2012-GNT-0001 Gnatrol WDG.pdf
Monterey Garden Spray	Spinosad	See Safety Data Sheet: MontereySprayMSDS.pdf
Organocide™ 3-in-1 Garden Spray	Sesame Oil Fish Oil, Lecithin	See Safety Data Sheet: Organocide-3in1-Garden-Spray-Concentrate-SDS.pdf

Safer® Brand Insect Killing Soap Concentrate	Potassium salts of fatty acids	See Safety Data Sheet: MSDS-Insect-Killing-Soap.pdf
Simple Green All-Purpose Cleaner Simple Green Scrubbing Pad	2-butoxyethanol, Ethoxylated Alcohol, Tetrapotassium Pyrophosphate, Sodium Citrate	See Safety Data Sheet: MSDS EN-US AllPurposeCleaner.pdf
Yellowstone Brand High Purity Sulfur	Sulfur	See Safety Data Sheet: High Purity Sulfur SDS 5-1-2015.pdf

Appendix 3 - Hazard Report Form

FOR REPORTING STAFF	
Name (Optional):	Date Reported:
Location:	
Equipment:	
Description of hazard:	
Suggested corrective action:	
Signature of reporting staff (Optional):	
FOR INVESTIGATOR (may be the supervisor of the work area)	
Investigator's name:	Title:
Investigator's remarks:	
Corrective actions taken:	

Investigator's signature:	Date:
FOR SAFETY COMMITTEE	
Members:	Date:
Follow-up remarks:	
Follow-up actions:	
Date Reporting Staff Notified of Conclusions:	

Appendix 4 - Personal Protective Equipment (PPE) Assessment

Department: _____ Job Title: _____

Supervisor/Assessor's Name: _____ Date: _____

Eye and Face Protection (29 CFR 1910.133)	If Yes, describe the job task and hazard	
1. Does the employee work in areas where there is exposure to eye and face hazards from flying particles, molten metal, liquid chemicals, acids, caustic liquids, chemical gases or vapors or potentially injurious light radiation?	YES	No
Head Protection (29 CFR 1910.135)		
2. Does the employee work in areas where there is a potential for injury to the head from falling or moving objects?	YES	No
3. Does the employee work in areas where they are exposed to electrical conductors which could be contacted by the head?	YES	No
Foot Protection (29 CFR 1910.136)		
4. Does the employee work in areas where there is a danger of foot injuries due to falling and rolling objects, or objects piercing the sole (i.e., crushing or penetrating hazards)?	YES	No
5. Does the employee work in areas where there is exposure to the foot from hot, corrosive, or poisonous substances?	YES	No
6. Does the employee work in areas where the employee's feet are exposed to electrical hazards?	YES	No

7. Does the employee work in areas which are abnormally wet?	YES	No
Hand Protection (29 CFR 1910.138)		
8. Does the employee work in areas where their hands are exposed to skin absorption of harmful substances; severe cuts or lacerations; severe abrasions; punctures; chemical burns; thermal burns; and/or harmful temperature extremes?	YES	No
Body (torso) Protection (29 CFR 1910.132)		
9. Does the employee work in areas where exposed body parts are exposed to splashing chemicals, flying debris, abrasion, thermal extremes, or other hazards to health or damage to clothing?	YES	No
Respiratory Protection (29 CFR 1910.134)		
10. Does the employee work in areas where air contaminated with harmful dusts, fogs, mists, smokes, sprays or vapors exist which cannot be feasibly controlled to safe exposure levels through the implementation of engineering controls (for example, use of enclosures or local exhaust ventilation)?	YES	No
Hearing Protection (29 CFR 1910.95)		
11. Does the employee work in areas where noise exposure may equal or exceed a time-weighted average of 80 dBA?	YES	No

Use the back of the sheet for additional writing space.

Appendix 5 - PPE Inspection Questionnaire

✓	Items to check	Comments
	Has a Personal Protective Equipment (PPE) assessment been conducted for the task?	
	Is a copy of the PPE Assessment Form in a safety notebook in the workroom?	
	Are employees trained in the use and care of their PPE?	
	Is documentation of the training in a safety notebook in the workroom?	
	Does the furnished PPE fit?	
	Is the PPE in good condition?	
	Is the PPE appropriate for the job?	
	Do employees wear PPE when required?	

Appendix 6 - Safety Inspection Guide

A – Adequate at time of inspection

B – Needs immediate attention

C – Needs consideration

1. JOB SITE INFORMATION	A	B	C
a) Are OSHA and other job-site warning posters posted?			
b) Do you have safety meetings?			
c) Do you have job safety training?			
d) Are there medical services, first aid equipment, and qualified first aid available (if needed)?			
e) Are job site injury records being kept as required by OSHA?			
f) Are emergency telephone numbers, such as police department, fire department, doctor, hospital, and ambulance posted?			
g) Does each workroom have one or more clearly-labeled safety notebooks containing required information?			
2. HOUSEKEEPING AND SANITATION	A	B	C
a) Are working areas generally neat?			
b) Is waste and trash regularly disposed of?			
c) Is there an enclosed chute provided when material is dropped outside of the building from over 20 feet?			
d) Is adequate lighting provided?			
e) Are projecting nails removed or bent over?			
f) Are spilled water, hazardous substances removed?			
g) Are waste containers provided and used?			
h) Are passageways and walkways clear?			
i) Are sanitary facilities adequate and clean?			
j) Is potable water available for drinking?			
k) Are disposable drinking cups and a container for the used cups provided?			

3. FIRE PREVENTION	A	B	C
a) Has a fire protection program been developed?			
b) Have fire instructions been given to personnel?			
c) Are adequate fire extinguishers identified, checked and accessible?			
d) Are phone numbers of fire departments posted?			
e) Are hydrants clear and access open?			
f) Is good housekeeping being practiced?			
g) Are NO SMOKING signs posted and enforced where needed?			
h) Are temporary heating devices safe and is there adequate ventilation?			
4. ELECTRICAL INSTALLATIONS	A	B	
a) Is wiring adequate and is it well insulated and grounded, if required?			
b) Are fuses provided?			
c) Are electrical dangers posted?			
d) Are proper fire extinguishers provided?			
e) Are terminal boxes equipped with required covers?			
5. HAND TOOLS	A	B	C
a) Are proper tools being used for each job?			
b) Are tools neatly stored and carried safely?			
c) Are tools inspected and maintained?			
d) Are damaged tools repaired or replaced promptly?			

A – Adequate at time of inspection **B** – Needs immediate attention **C** – Needs consideration

Appendix 7 - Equipment Maintenance List

Injury with Lost Time _____ 1st Aid _____ Non-injury Incident _____

Details of person injured or involved (to be filled in by person injured/involved if possible)

Person Completing Report: _____ Today's Date: _____

Person(s) Involved: _____

Equipment or Vehicle License Plate: _____

Event Details

Date of Event: _____ Location: _____

Time of Event: _____ Witnesses: _____

Description of Events (Describe tasks being performed and sequence of events)

If more space is required, use the back of the sheet

Was the incident caused by an unsafe action (activity or movement) or an unsafe condition (machinery or weather)? Please explain:

TO BE COMPLETED ONLY IF AN INJURY OCCURRED

Type of injury sustained

Cause of injury

Was medical treatment
needed?

Yes _____ No _____
If yes, name of hospital or physician:

Signature of Employee: _____ Date: _____

Signature of Supervisor: _____ Date: _____

Appendix 9 - Company Contacts for Emergency Reporting

Name	Title	Contact Number
------	-------	----------------

Bloodborne Pathogens	Managers, security personnel, maintenance personnel
Chemical Container Labeling	All employees
Chemical Hazards (general)	All employees
Chemical Hazards (specific)	An employee who uses or is exposed to a particular chemical
Chemical Spill Response	All employees
Electrical Safety	Maintenance employees, employees who service equipment
Facility Safety Rules	All employees
Fire extinguisher safety	Managers, security personnel, any other employee interested in training
Forklift Training	Employees who operate a forklift
Hazard Management	All employees
Heat Stress	Employees who may work outdoors in high temperatures or near heat-producing equipment
Job Hazard Analysis	All employees
Ladder Safety	All employees
Lockout System (Awareness)	All employees
Lockout Training (Advanced)	Maintenance employees, employees who service equipment
Personal Protective Equipment (PPE)	All employees
Poison Control	All employees
Respiratory Protection	Employees who use a respirator
Safe Lifting	All employees
Safety Committee	All employees
Safety Data Sheets	All employees
Tool and Equipment Safety	All employees

Updates to this appendix should also be made in the [Staffing and Training Plan](#).

Appendix 11 - Critical Shutdown Procedure Assignments

Process	Responsible Staff
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Shutting down Air Cooling System	Facilities Mgr
Shutting down Dehumidifiers	Facilities Mgr

Jolly Green Extraction/Manufacturing Plan


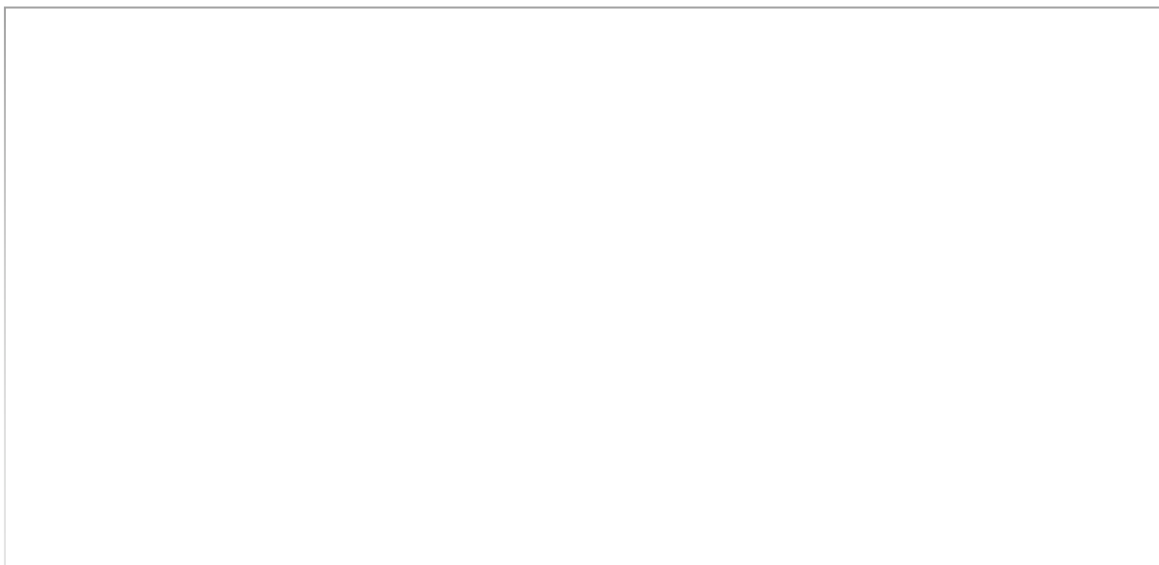
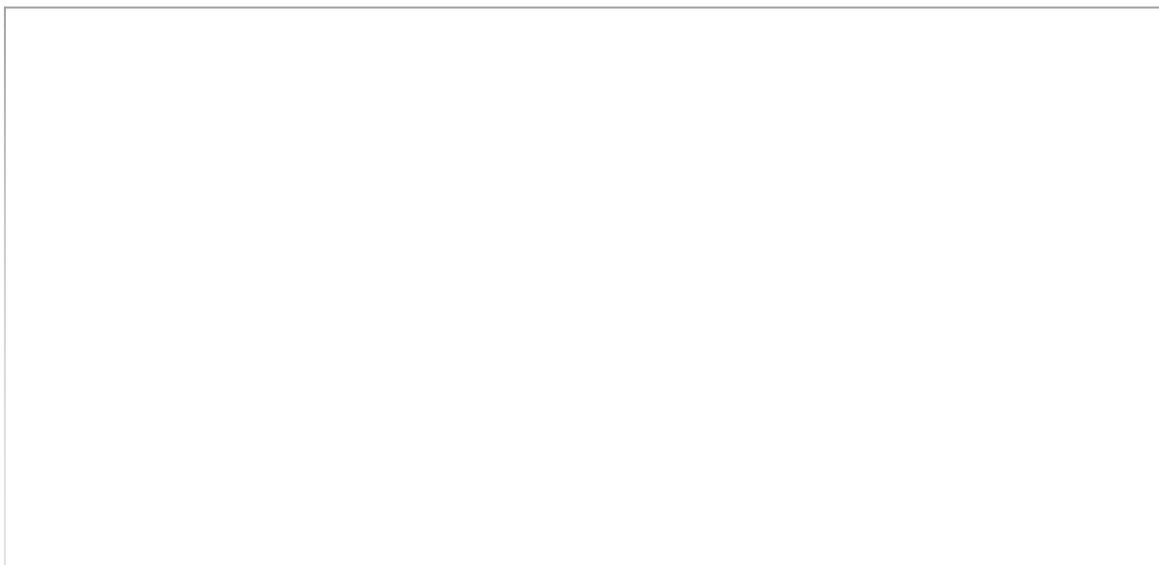


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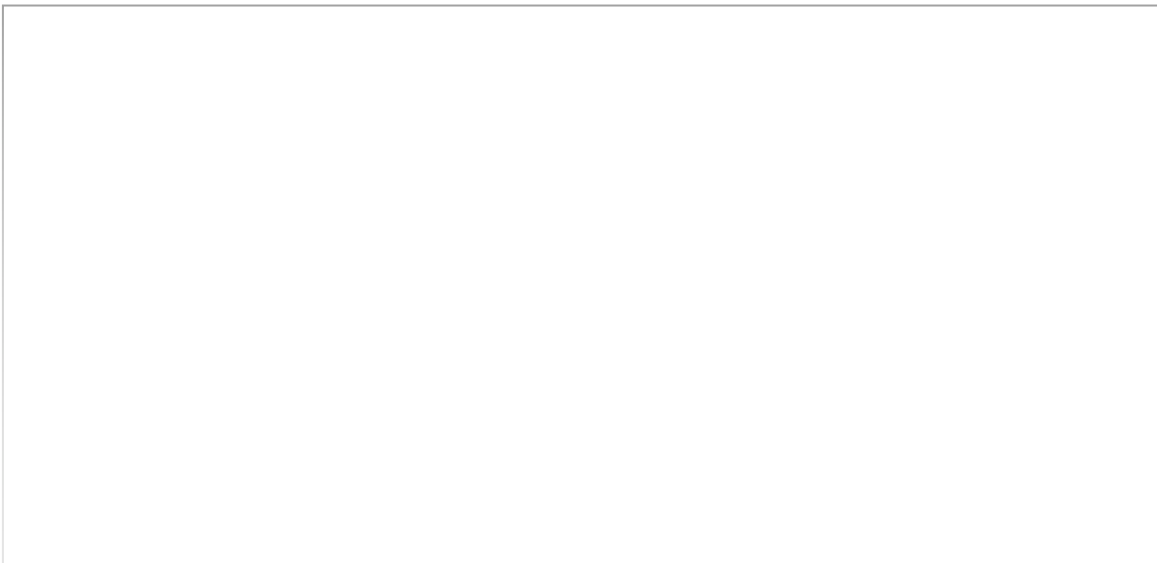


Introduction

Jolly Green will, in addition to the cultivation of cannabis, produce cannabis extracts (oils containing high concentrations of THC) and manufacture a variety of products that include the oils as a primary ingredient. The following Manufacturing Plan outlines the expertise, equipment, methods and quality control practices involved in both the extraction process and the formulation of Jolly Green's THC oil-containing product line.

Jolly Green will implement a quality control system to assure the identity, strength, quality, and purity of cannabis products by adequately controlling manufacturing operations. This includes establishing strong quality management procedures, obtaining appropriate quality raw materials, establishing robust standard operating procedures, detecting and investigating product quality deviations, and maintaining reliable testing laboratories. This formal system of controls helps to prevent instances of contamination, mix-ups, deviations, failures, and errors.

As a precursor to manufacturing cannabis products, Jolly Green acknowledges that a certificate of approval for its cannabis manufacturing facility is subject to all of the regulations and operational standards set forth in the current regulations, in addition to the conditions stated in the certificate of approval itself. All applicable laws will be followed in relation to water usage and conservation, environmental protection, security, odor control, quality control and worker safety.



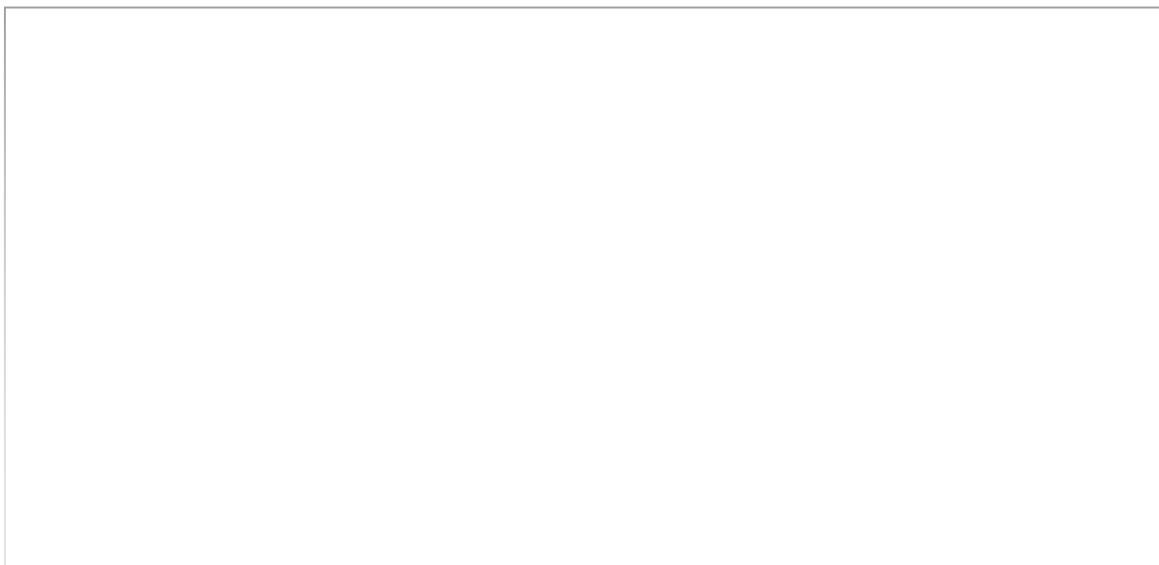
Roles and Responsibilities

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:

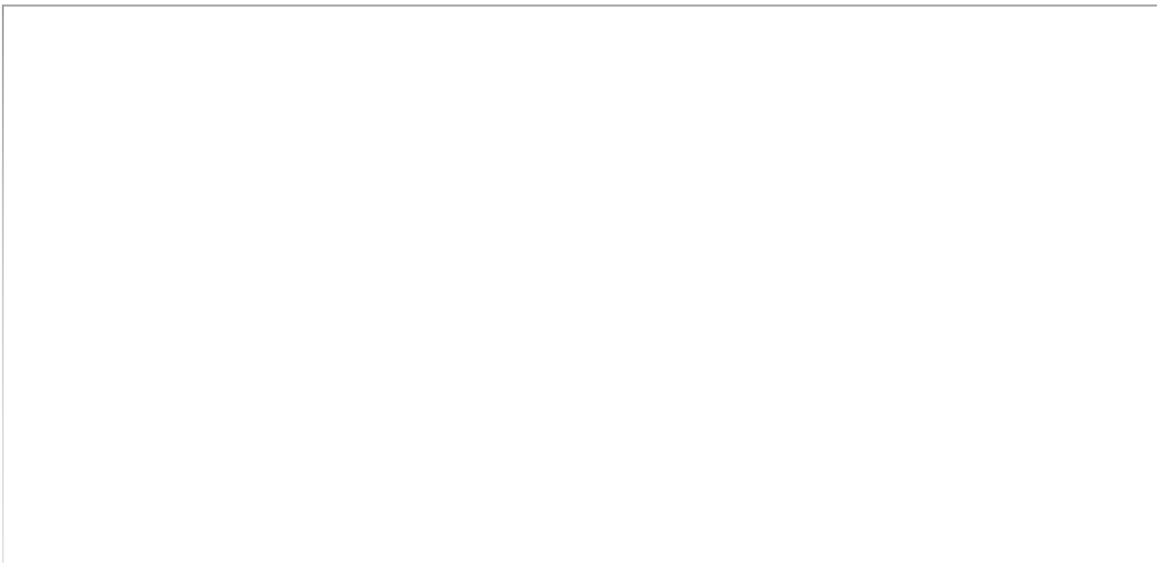
- Manage the budgets, overall supply chains, and operations of the manufacturing activities.
- Implement the Manufacturing Plans, primarily through the hiring and supervision of the Manufacturing Managers.
- Ensure product safety and work with other department heads to comply with regulations and required 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 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 manufacturing management and leadership experience, including pharmaceutical or herbal medicine industries; Bachelor's degree in a manufacturing field preferred
- A basic understanding of the processes involved in manufacturing; knowledge of the cannabis industry preferred
- Strategic planning and business development experience



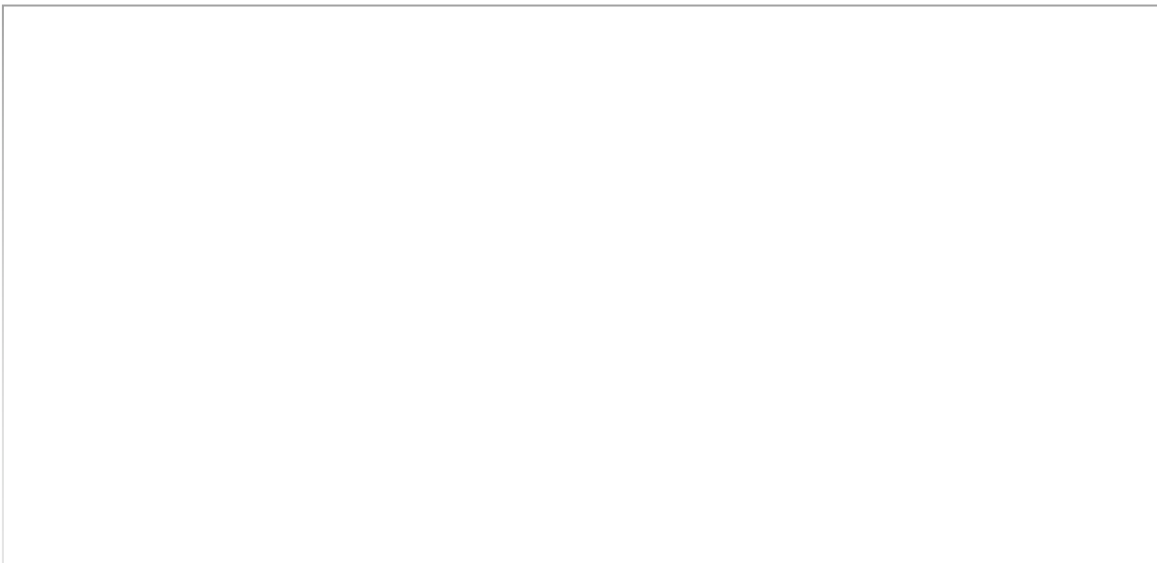
- Ability to resolve problems with and between employees in a respectful and fair manner, based on sound human resources principles
- Ability to demonstrate experience in improving production and efficiency
- Excellent communication skills, written and verbal, with the ability to clearly communicate issues to all levels of management
- Ability to quickly become familiar with all regulations and Standard Operating Procedures and monitor regulatory updates

Extraction Manager

The Extraction Manager reports to the Director of Production and manages a team of extraction technicians in the safe and efficient production of high-quality cannabis extracts.

Responsibilities include, but are not limited to:

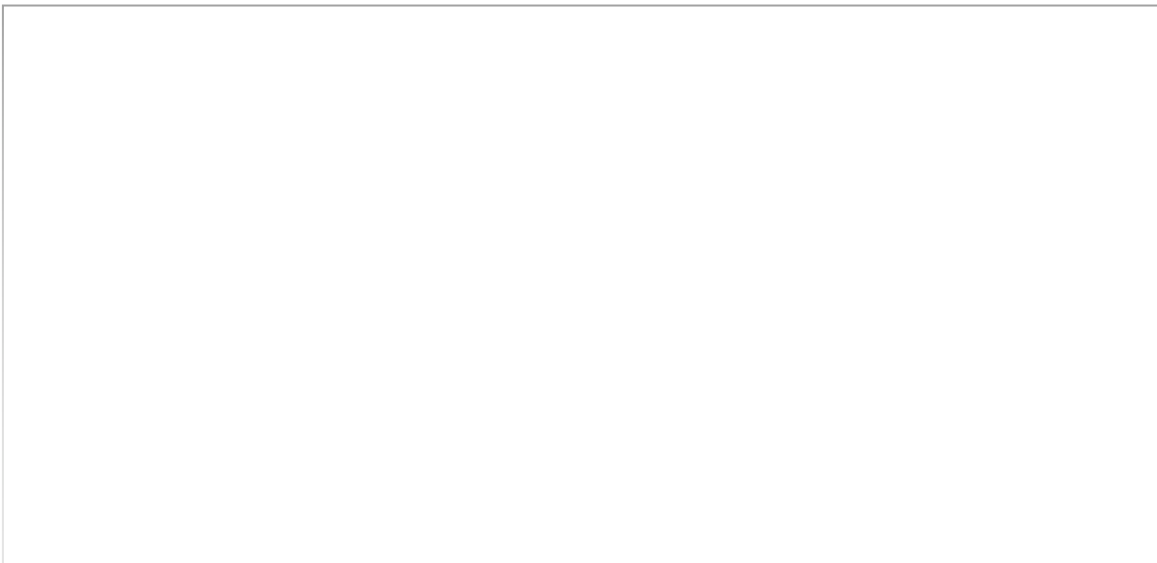
- Assist with design and setup of the extraction facility for maximum efficiency.
- Manage a team that handles all aspects of daily extraction activities.
- Create and implement task-specific SOPs to be followed by extraction technicians.



- Work closely with the Quality Assurance Officer to carry out task-related risk analyses and to monitor and improve the implementation of SOPs.
- Train employees in SOPs, problem solving, and health and safety issues.
- Ensure that supplies are ordered in a timely manner to meet production schedules.
- Manage scheduling to accurately project all extraction requirements on a daily, weekly, and monthly basis to provide a steady and consistent supply of product.
- Measure and maintain the overall quality levels of the extracted materials, including consistent potency, purity, texture, flavor, etc., by performing in-process and post-process quality assurance testing and conducting visual inspections.
- Run industrial and bench scale processing equipment for cannabis oil extraction (CBD & THC) from leaf and/or distillate and isolates.
- Work with licensed testing laboratories to ensure chain-of-custody compliance during sample gathering and reporting.
- Work with the Inventory Control Manager to perform all extraction-related tracking with the inventory control system in compliance with rules and regulations.
- Inspect the extraction facility areas to identify building components or equipment that may need repairs or adjustments. Alert upper management of any issues that will require an unusual amount of time or expense to address.

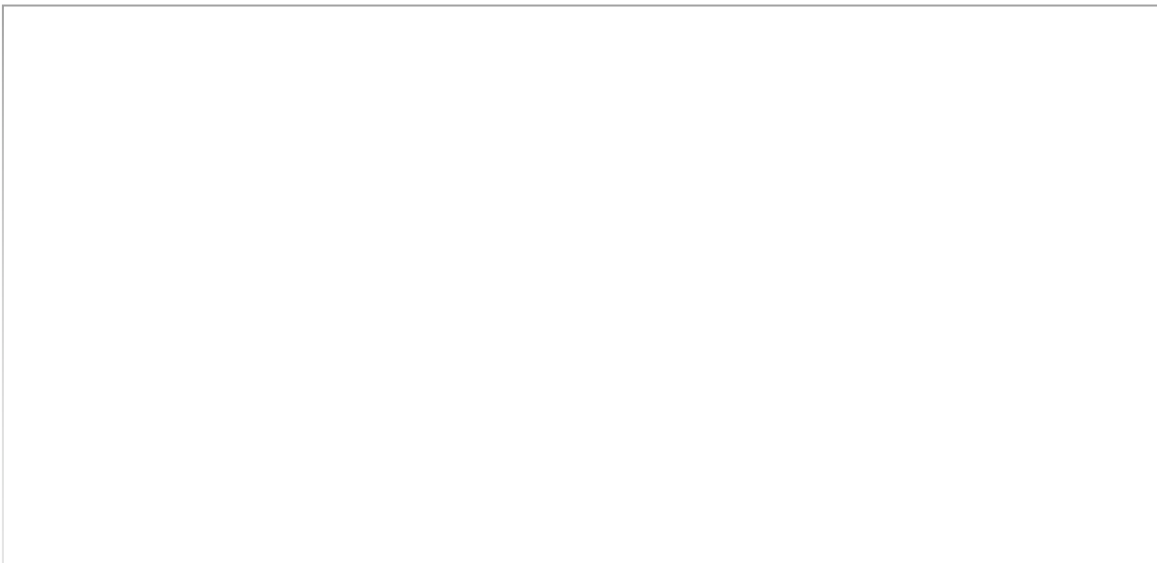


- Manage the regular cleaning and maintenance of equipment and facility to keep working areas in sanitary conditions.
- Develop and test new extraction methods, and make suggestions for improving extraction systems.
- Provide weekly reports to the Director of Production.
- Foster a spirit of cooperation, respect and professionalism among employees and other managers.
- Collaborate with the Security Manager to ensure the security of the extraction area, the resulting products, and the transfer of products.
- Oversee destruction of marijuana-derivative products.
- Be prepared to meet with state and local regulatory officials to facilitate inspections and audits.
- Ensure that tracking logs and other records are forwarded to the Record Keeping Manager.
- Maintain records such that requests for information from regulating authorities or law enforcement can be met by required deadlines.
- Remain current in the understanding of best practices related to extraction through webinars, conferences, online training, and professional industry networking.



Requirements

- A minimum of 3-5 years of experience managing a cannabis extraction or similar facility
- Experience developing task-specific procedures and training employees
- Detailed knowledge and experience with multiple extraction methods and machinery
- Experience in multiple refinement/purification methods for oil-based extracts
- Expertise in non-volatile extraction methods, as well as the purification, separation and isolation of various compounds
- Experience measuring and documenting pharmaceutical-grade product consistency
- Knowledge of common contaminants, their sources and mitigation methods
- Detailed knowledge of state and OSHA health and safety regulations related to extraction activities, safety data sheets, and the Globally Harmonized System of Classification and Labelling of Chemicals
- Experience maintaining the freshness of unstable terpene-rich whole-plant extracted concentrates
- Knowledge of industry best practices and current on new techniques
- Ability to function in a fast-paced, high-demand environment

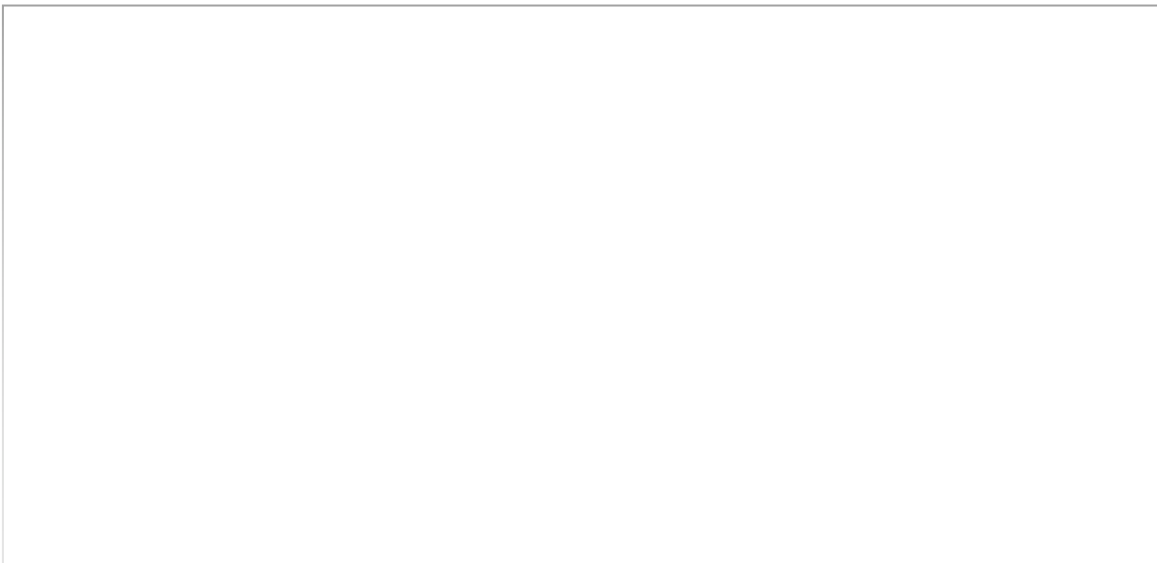


- Excellent communication skills
- Ability to pass a background check

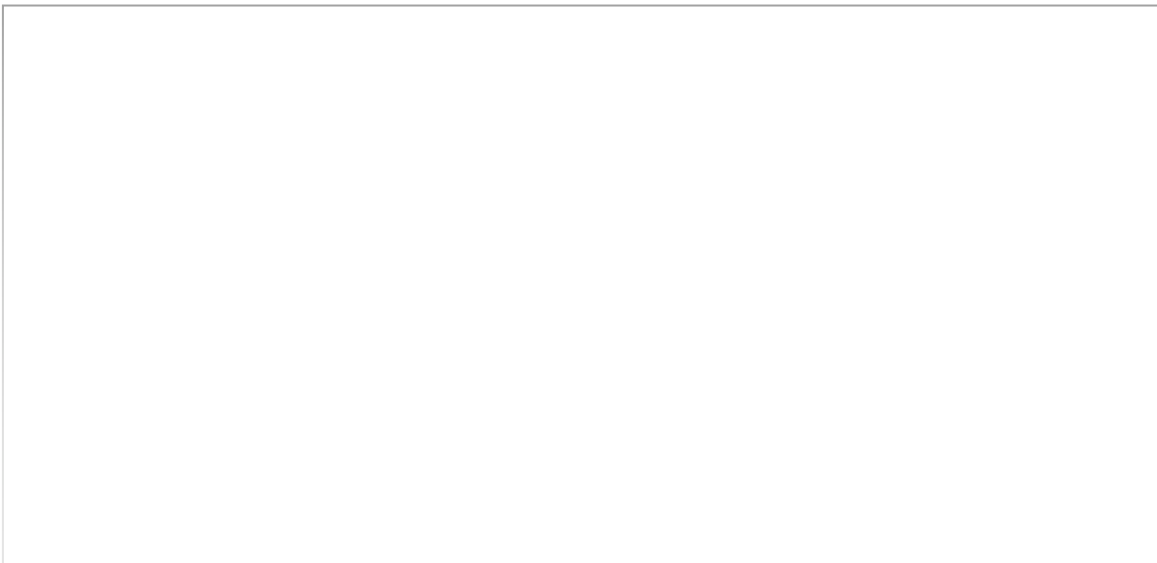
Chief Product Formulator

Responsibilities include, but are not limited to:

- Assist with design and setup of the manufacturing facility for maximum efficiency.
- Help formulate products according to stated business objectives that will react appropriately when consumed by humans and pets.
- Manage a team that handles all aspects of daily manufacturing activities.
- Create and implement task-specific SOPs to be followed by manufacturing technicians.
- Work closely with the Quality Assurance Officer to carry out task-related risk analyses and to monitor and improve the implementation of SOPs.
- Train employees in SOPs, problem solving, and health and safety issues.
- Ensure that supplies are ordered in a timely manner to meet production schedules.
- Manage scheduling to accurately project all manufacturing requirements on a daily, weekly, and monthly basis to provide a steady and consistent supply of product.



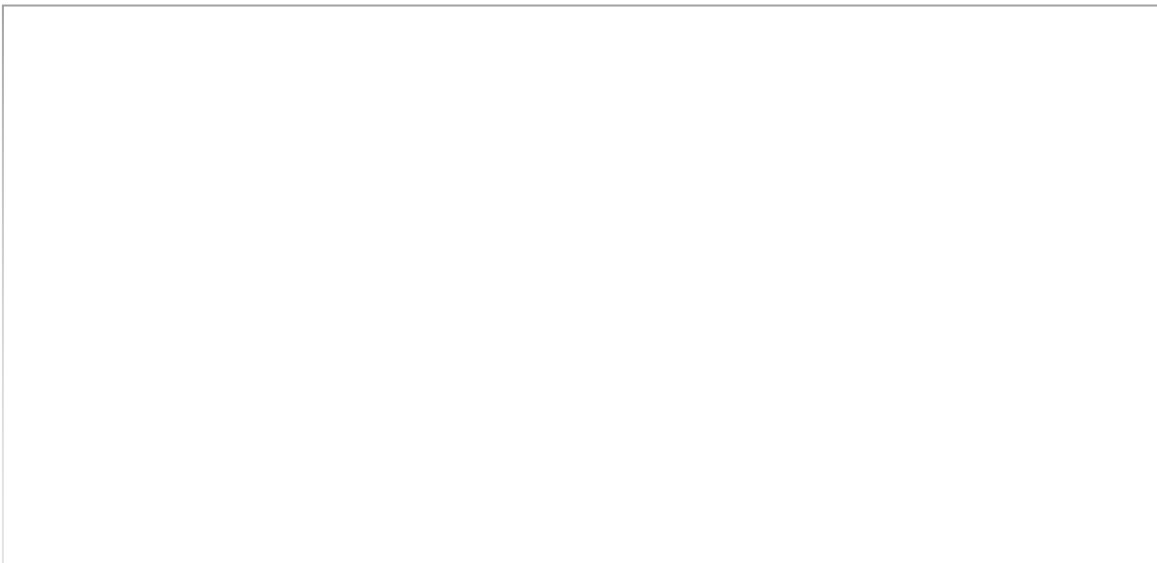
- Measure and maintain the overall quality levels of the manufactured products, including consistent potency, purity, texture, flavor, etc., by performing in-process and post-process quality assurance testing and conducting visual inspections.
- Perform bench scale assays and proof-of-concept experiments.
- Research and summarize relevant trends and processes for new potential marketable products.
- Work with licensed testing laboratories to ensure chain-of-custody compliance during sample gathering and reporting.
- Work with the Inventory Control Manager to perform all manufacturing-related tracking with the inventory control system in compliance with rules and regulations.
- Inspect the extraction facility areas to identify building components or equipment that may need repairs or adjustments. Alert upper management of any issues that will require an unusual amount of time or expense to address.
- Manage the regular cleaning and maintenance of equipment and facility to keep working areas in sanitary conditions.
- Develop and test new manufacturing methods, and make suggestions for improving systems.
- Provide weekly reports to the Director of Production.
- Collaborate with the Security Manager to ensure the security of the manufacturing area, the resulting products, and the transfer of products.
- Oversee destruction of marijuana-derivative products.



- Be prepared to meet with state and local regulatory officials to facilitate inspections and audits.
- Ensure that tracking logs and other records are forwarded to the Record Keeping Manager.
- Maintain records such that requests for information from regulating authorities or law enforcement can be met by required deadlines.
- Remain current in the understanding of best practices related to manufacturing through webinars, conferences, online training, and professional industry networking.

Requirements

- Undergraduate degree in chemistry, chemical engineering or biotechnology
- Previous experience working with cannabis extracts and/or exceptional knowledge of its properties and how it uniquely reacts when infused into digestible products (oils, sprays, patches, lotions, tinctures, capsules, edibles etc.)
- Thorough understanding of common methods and technologies for herbal extraction, distillation, emulsification and creating semi-solid formulations
- Experience measuring and documenting pharmaceutical-grade product consistency
- Knowledge of common contaminants, their sources and mitigation methods



- Detailed knowledge of state and OSHA health and safety regulations related to manufacturing activities, safety data sheets, and the Globally Harmonized System of Classification and Labelling of Chemicals
- Experience maintaining the freshness of unstable terpene-rich extracted cannabis concentrates
- Experience with tableting and encapsulation processes
- Knowledge of food safety regulations
- Enthusiasm for both research/computation and hands-on experimentation
- Attention to detail and efficiency in a manufacturing setting
- Ability to function in a fast-paced, high-demand environment
- Excellent communication skills

Quality Control

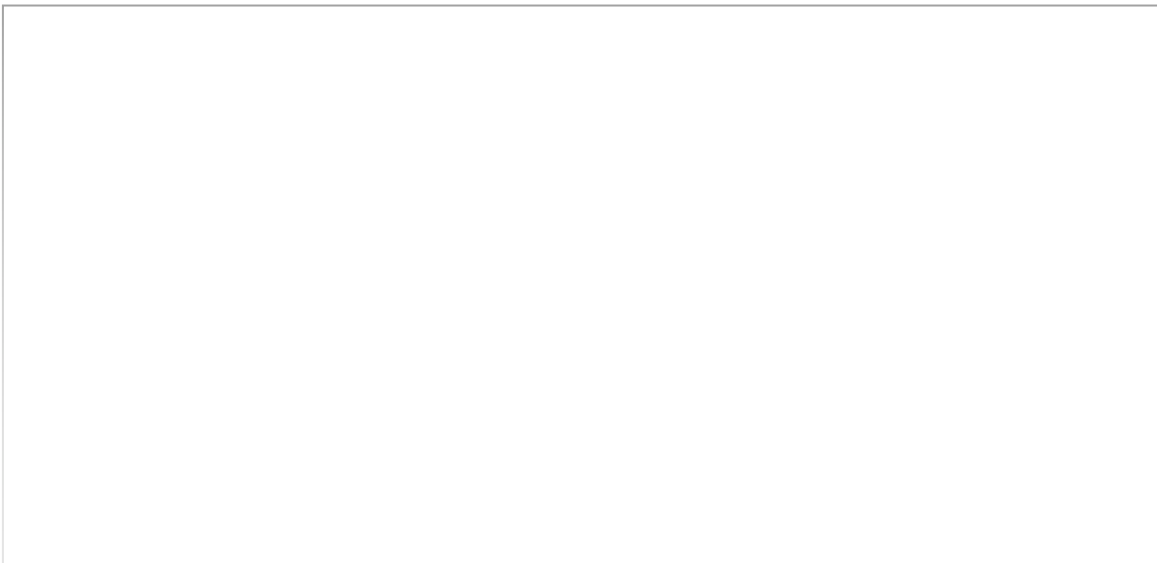
Additional Quality Control information can be found in the Manufacturing Quality Assurance Plan

Jolly Green will implement controls and procedures to ensure that each batch meets the specifications identified by the regulatory agency. The Standard Operating Procedures will identify points, steps and stages in the process where critical control is necessary to

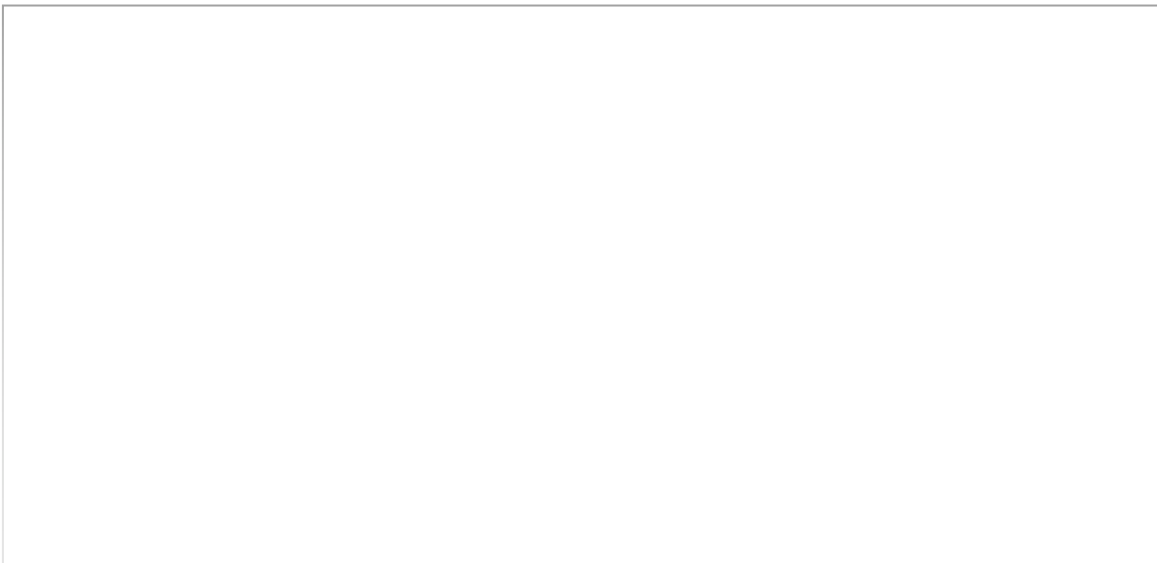


ensure the quality and consistency of all final products, and how those controls will be followed and documented. Quality assurance priorities will ensure that:

- The selection, weighing, and measuring of raw materials and the determination of finished yield are reviewed by a second individual to ensure accuracy and consistency.
- Major equipment, transfer lines, containers and tanks used for processing, holding, or filling are properly labeled and logged to indicate contents, batch identification/designation, stage of processing and control status.
- Appropriate measures are in place and being used to prevent contamination by microorganisms, chemicals, dust, or other extraneous material.
- The creation and implementation of in-process controls to ensure product uniformity, and integrity (for example, in-process batch weights) are properly done.
- The storage and handling of product packaging is done in a way to prevent selection errors and microbiological, particulate, or chemical contamination.
- Water used as an ingredient is tested or monitored regularly to verify that it meets applicable chemical, physical, and microbiological specifications for quality.
- All raw materials and finished products will be stored appropriately, batch tested for quality control, and handled with care utilizing gloves, lab coats/coveralls, hair and beard nets where applicable.



- A batch production record will be created for each individual batch within a formulation and logged into the compliance software.
- The hygiene of the employees and the sanitation of the facility and are maintained through implementation of appropriate training, policies and procedures.
- Measuring devices are properly calibrated on a regular basis to assure that measurement values are accurate and consistent from each batch of cannabis product. Batches will be tested by a third-party facility to ensure that the cannabis products are safe and suitable for human consumption and/or use.
- Logs will be kept on site of required and completed self-audits, inspections and maintenance.
- Replaceable parts, supplies and items will be kept on hand.
- Potential hazardous risks posed by cannabis concentrate products, including the risk of microbial activity, pesticides residues, and solvent residues, will be identified and prevented for raw materials and finished products through rigorous testing protocols. Parts per million for one (1) gram of finished extract produced in Jolly Green's cannabis manufacturing facility will not exceed five hundred 5 parts per million of residual solvent or gas when quality assurance tested.
- A warning will be contained on the product label of all cannabis concentrate products to encourage consumers to monitor their use of THC-containing products and to avoid operation of a motor vehicle and other types of heavy equipment.

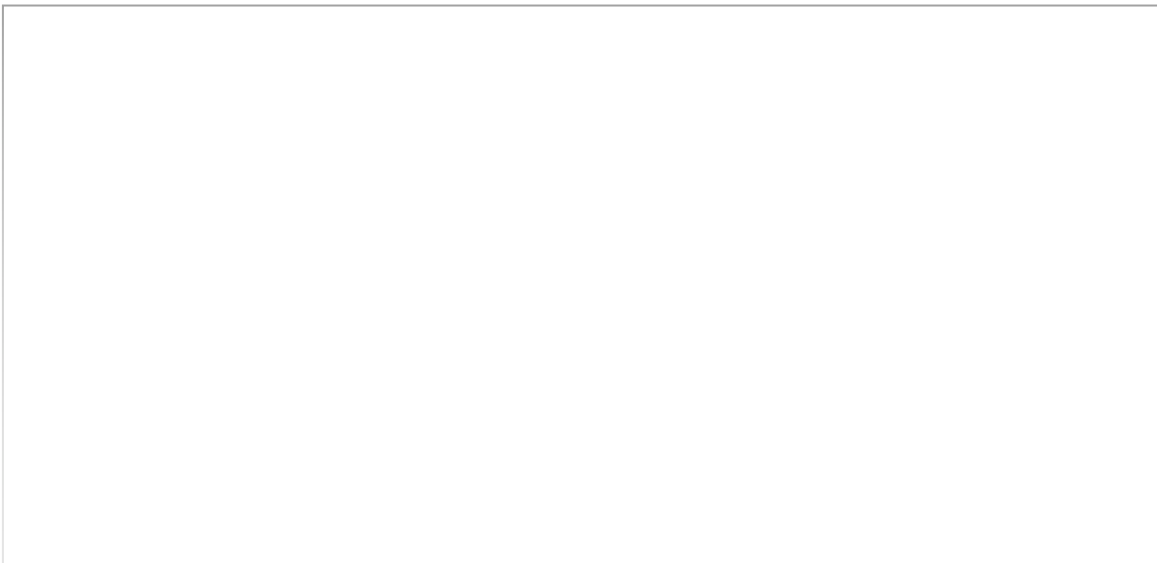


- Topical cannabis products will only contain ingredients permitted for cosmetic manufacturing in accordance with regulatory guidelines.

Employee Hygiene

In accordance with City of Gardner all individuals working in direct contact with cannabis products, cannabis product-contact surfaces, and cannabis product-packaging materials will conform to hygienic practices to the extent necessary to protect against allergen cross-contact and contamination of cannabis products while on duty. The methods for maintaining cleanliness include:

- Wearing appropriate outerwear to protect against allergen cross-contact and contamination of cannabis products, contact surfaces, and packaging materials.
- Maintaining adequate personal cleanliness.
- Washing hands thoroughly in an adequate hand-washing facility before starting work, after each absence from the workstation, and at any time when hands may have become soiled or contaminated, and sanitizing hands if necessary to protect against contamination with undesirable microorganisms.
- Removing all unsecured jewelry and other objects that might fall into cannabis products, equipment, or containers, and removing hand jewelry that cannot be adequately sanitized during periods in which cannabis products are manipulated by hand. If such hand jewelry cannot be removed, it may be covered by material which can be maintained in an intact, clean, and sanitary condition and which effectively

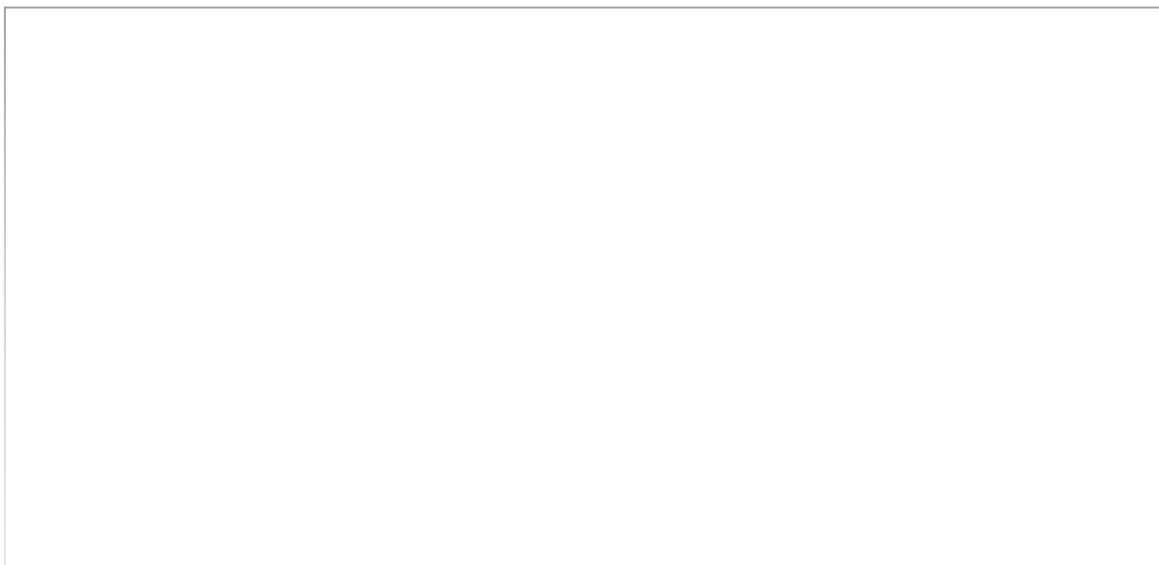


protects against the contamination by these objects of the cannabis products, cannabis product- contact surfaces, or cannabis product-packaging materials.

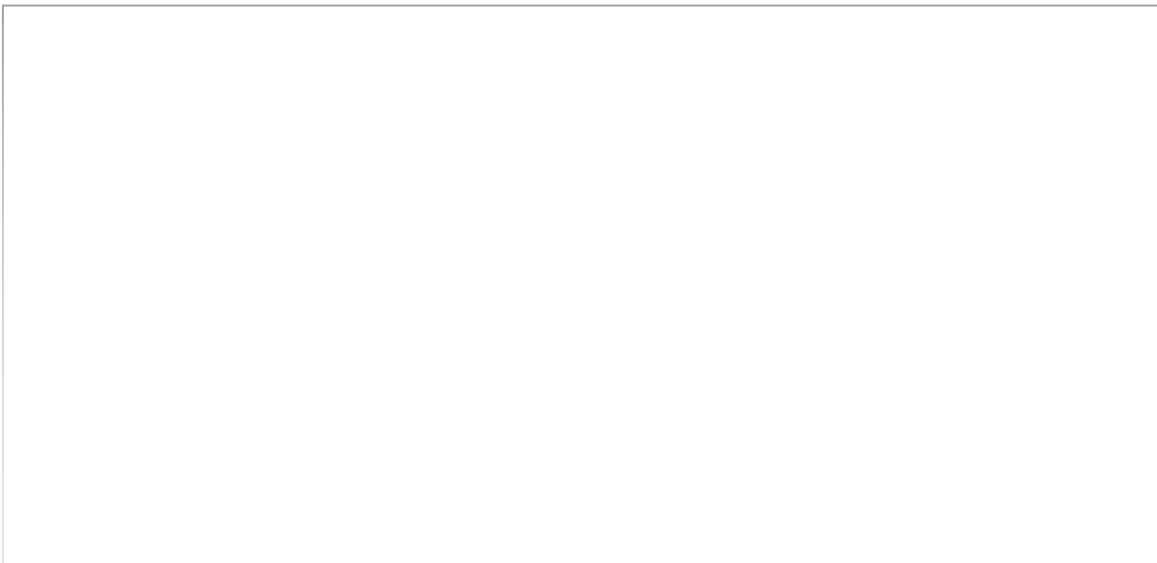
- Maintaining any gloves, if they are used in cannabis product handling in an intact, clean, and sanitary condition.
- Wearing hair nets, headbands, caps, beard covers, or other hair restraints in an effective manner, where appropriate.
- Storing clothing or other personal belongings in areas separate from those where cannabis products are exposed or where equipment or utensils are washed.
- Confining the following activities to areas separate from those where cannabis products may be exposed or where equipment or utensils are washed: eating food, chewing gum, drinking beverages, and/or using tobacco.
- Taking any other necessary precautions to protect against allergen cross-contact and against contamination of cannabis products, cannabis product-contact surfaces, or cannabis product-packaging materials by microorganisms or foreign substances (including perspiration, hair, cosmetics, tobacco, chemicals, and medicines applied to the skin).

Sanitation - Facilities

In accordance with City of Gardner, Jolly Green's manufacturing premises will be equipped with adequate sanitary accommodations as follows:



- **Water Supply.** The water supply will be adequate for the operations intended and derived from an adequate source. Any water that contacts cannabis products, cannabis product-contact surfaces, or cannabis product-packaging materials will be safe and of adequate sanitary quality. Running water will be provided in all areas where required for the processing of cannabis products, for the cleaning of equipment, utensils, and cannabis product-packaging materials, and/or for employee sanitary facilities.
- **Plumbing.** Plumbing systems will be of adequate size and design and will be adequately installed and maintained in order to:
 - Carry adequate quantities of water to required locations throughout the manufacturing facility premises.
 - Properly convey sewage and liquid disposable waste from the facility premises.
 - Avoid the creation of unsanitary conditions and contamination to cannabis products, water supplies, equipment, or utensils.
 - Provide adequate floor drainage in all areas where floors are subject to flooding-type cleaning or where normal operations release or discharge water or other liquid waste on the floor.
 - Provide that there is no backflow from, or cross-connection between, piping systems that discharge wastewater or sewage, and piping systems that carry water for cannabis products or cannabis product manufacturing.
- **Sewage Disposal.** Sewage will be disposed of into an adequate sewerage system or through other adequate means.

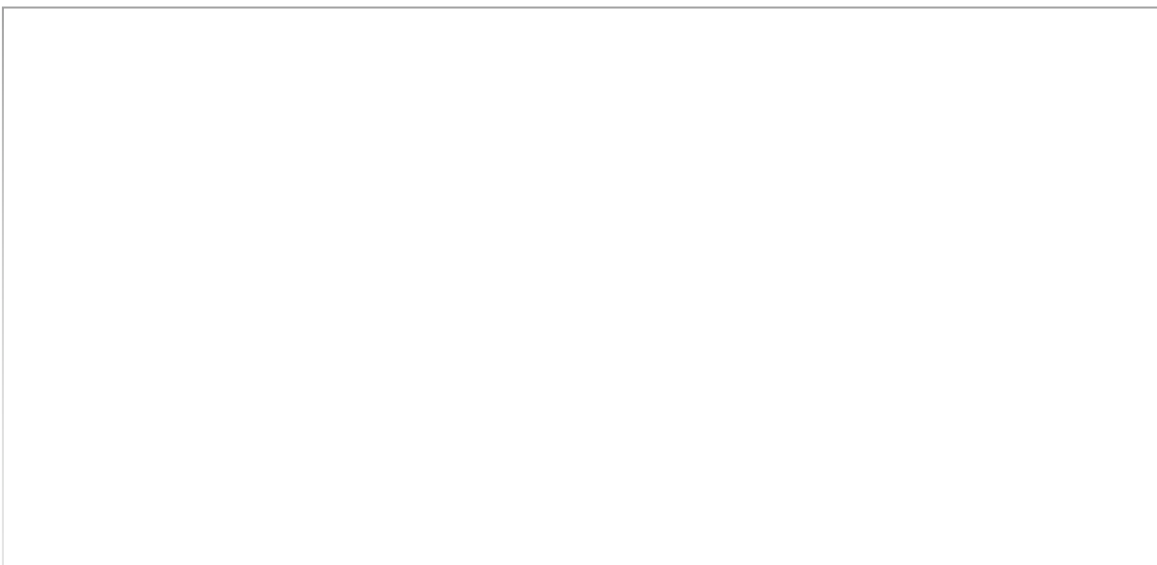


- **Toilet Facilities.** Each manufacturing facility premises will provide employees with access to adequate, readily accessible toilet facilities. Toilet facilities will be kept clean and will not pose a potential source of contamination of cannabis products, cannabis product-contact surfaces, or cannabis product-packaging materials.
- **Hand and Eye Washing Facilities.** The manufacturing premises will provide hand and eye washing facilities designed to ensure that an employee's hands do not pose a source of contamination to cannabis products and that any unwanted eye exposure to irritants can be immediately treated. Washing facilities will be conveniently located, and furnish running water of up to 100° F (30° C).
- **Waste Disposal.** Waste will be conveyed, stored, and disposed of so as to minimize the development of odor, minimize the potential that waste will attract, harbor, or otherwise contribute to the breeding of pests, and protect against the contamination of cannabis products, cannabis product-contact surfaces, cannabis product-packaging materials, water supplies, and ground surfaces.

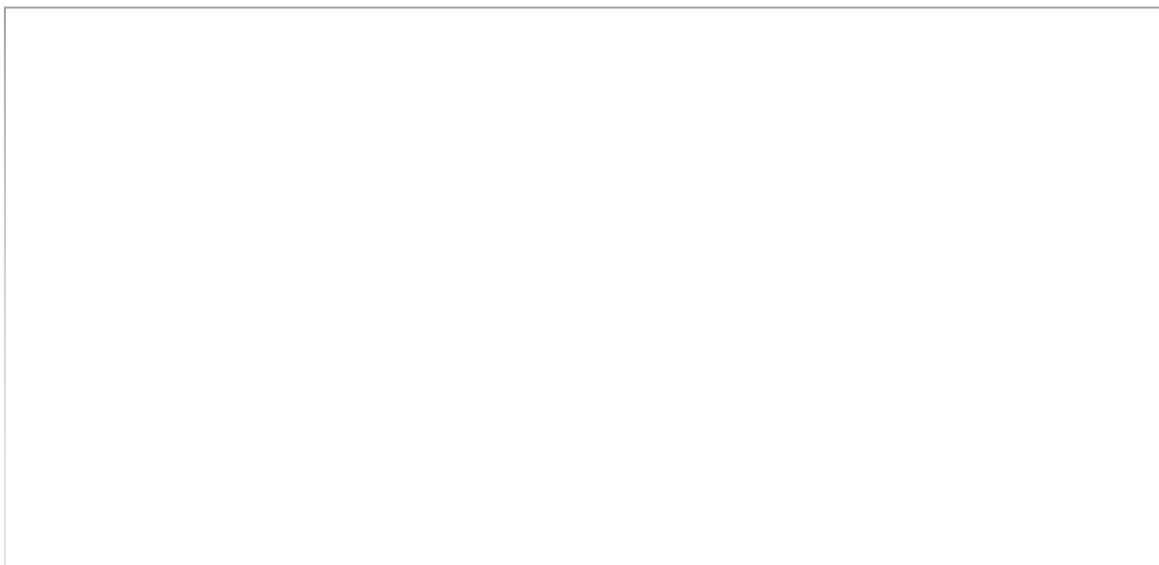
Sanitation - Standards and Processes

In accordance with City of Gardner, Jolly Green will establish and implement written sanitary operation procedures to ensure the following:

- The premises, including any buildings, fixtures, and other physical facilities on the premises are maintained in a clean and sanitary condition and are kept in good repair so as to prevent cannabis products from becoming adulterated.



- The cleaning and sanitation of utensils and equipment is conducted in a manner that protects against allergen cross-contact and contamination of cannabis products or product components, cannabis product-contact surfaces, or cannabis product-packaging materials.
- Cleaning compounds and sanitizing agents used in cleaning and sanitizing procedures are free from undesirable microorganisms and are safe and adequate under their conditions of use. Only the following types of toxic materials shall be used or stored on the premises where cannabis products are processed or exposed:
 1. Those required to maintain clean and sanitary conditions
 2. Those necessary for facility premises and equipment maintenance and operation
 3. Those necessary for use in the cannabis manufacturing facility's premises operations
- Toxic cleaning compounds, sanitizing agents, and pesticide chemicals are identified, held, and stored in a manner that protects against contamination of product components, cannabis products, cannabis product-contact surfaces, or cannabis product-packaging materials.
- Measures are taken to exclude pests from the cannabis manufacturing facility premises in all areas where cannabis components and/or products may be at risk of contamination by pests. The use of pesticides to control pests in the cannabis manufacturing facility premises is permitted only under precautions and restrictions that protect against the contamination of cannabis products, cannabis product-contact surfaces, and cannabis product-packaging materials.



- All cannabis product-contact surfaces including utensils and equipment are cleaned as frequently as necessary to protect against allergen cross-contact and contamination of cannabis products.
- Cannabis product-contact surfaces used for manufacturing, processing, packing or holding low-moisture cannabis products shall be maintained in a clean, dry, and sanitary condition before use. When such surfaces are wet-cleaned, they shall, when necessary, be sanitized and thoroughly dried before subsequent use.
- When cleaning is necessary to protect against allergen cross-contact or the introduction of microorganisms into cannabis products during processing methods that utilize water (wet processing), all cannabis product-contact surfaces shall be cleaned and sanitized before use and after any interruption during which cannabis product-contact surfaces may have become contaminated. Where equipment and utensils are used in a continuous production operation, their surfaces shall be cleaned and sanitized as necessary.
- Single-service articles (such as utensils intended for one-time use, paper cups, and paper towels) are stored, handled, and disposed of in a manner that protects against allergen cross-contact and contamination of cannabis product, cannabis product-contact surfaces, or cannabis product-packaging materials.
- The non-cannabis product-contact surfaces of equipment used in the cannabis manufacturing facility premises are cleaned in a manner and as frequently as necessary to protect against allergen cross-contact and contamination of cannabis products, cannabis product-contact surfaces, and cannabis product-packaging materials.



- Cleaned and sanitized portable equipment with cannabis product-contact surfaces and utensils are stored in a location and manner that protects cannabis product-contact surfaces from allergen cross-contact and contamination.

Security

Additional Security information can be found in the Security Plan

The general security guidelines to be followed are as follows:

- The production of cannabis products will be carried out in compliance with state and local laws.
- Law enforcement and regulatory agency personnel will be allowed unrestricted access to the premises during operating hours to monitor compliance with regulations.
- Jolly Green will not employ any person under the age of twenty-one (21) at its cannabis manufacturing facility.
- No person under the age of twenty-one (21) will be allowed on the premises. A sign will be posted at each entrance to the facility informing visitors of these restrictions.
- Members of the public will not be allowed access to the facility.
- Non-employees who have a reason to be on the premises will only be allowed access according to the procedures in the Comprehensive Security Plan.



- Access to areas in the facility where cannabis products are made, tested, or stored will be restricted and controlled according to the procedures defined the Comprehensive Security Plan.
- Jolly Green's cannabis manufacturing facility will have a professionally installed, maintained, and monitored alarm system as further specified in the Security Plan.
- Jolly Green's cannabis manufacturing facility will provide the police chief, with the name and telephone number of an on-site employee or owner to whom emergency notice can be provided. The telephone number provided will be capable of accepting recorded voice messages in the event the contact person does not answer.
- Compressed gases used in the extraction process will not be stored in containers that exceed 150-pound tanks in size. Jolly Green's facility will be limited to a total of ten (10) tanks on the property at any time. All entrances and exits to and from the premises, will be monitored by twenty-four (24) hour video security surveillance of at least HD quality with night vision capability. The video security system will be compatible with software and hardware mandated by the jurisdiction.

Worker Safety

More information can be found in the health and safety plan.

In order to ensure worker safety, Jolly Green's cannabis extraction and manufacturing processes will mitigate common risks associated with the handling of cannabis material and extraction and formulation machinery.

These risks include:



- Fires
- Co2 gas exposure
- Hearing loss
- Exposure to dust
- Exposure to other harmful vapors

Workers will be trained on fire prevention, as well as locations of fire safety equipment and associated protocols in the case of emergencies. Personal protective equipment (PPE) will be used at all times, according to safety protocols, including breathing masks, goggles and ear plugs.

Manufacturing Overview

In order to satisfy market demand for a variety of cannabis products, Jolly Green will be implementing a combination of extraction technologies. These will include Co2 extraction, hydrocarbon extraction, hash making and pre-roll smokable cigarettes. Jolly Green's manufacturing facility may use other low-tech methods, such as heat, screens, presses, steam distillation, ice water, and other methods without employing solvents or gases to create products such as kief, hashish, bubble hash, or infused dairy butter, or oils or fats derived from natural sources.

Cannabis-infused products will be created in lots of a specific quantity that is uniform and that is intended to meet company specifications for identity, strength, purity and composition. Each lot will be produced according to a single manufacturing order.



Procedures will include adequate supervision and in-process controls to ensure the consistency of each cannabis-infused product across manufacturing cycles.

Oversight

A supervisor will oversee each manufacturing order. Supervisors will use Jolly Green's electronic inventory control system (ICS) to create each manufacturing order, which will specify the agent(s) who will perform each procedure, the procedures and components to be used, and where the product will be stored or transferred after the procedure. A supervisor will be on-site and available at all times to oversee any manufacturing order in process. Supervisors will have the training, education, and experience essential to ensure that the product resulting from a manufacturing order matches company specification for identity, purity, strength, and composition of the product.

Lot Identification

When a supervisor creates a manufacturing order, the ICS will assign a unique lot number to the product that results from the order. Lot numbers will be used to track and identify components and cannabis-infused products through each stage of production. Manufacturing operations for each lot will be kept physically separated from each other. In-process storage containers, processing lines, and equipment will be marked with the lot number of the cannabis-infused product contained inside.



Process Controls

Jolly Green will establish specifications for measurements of time, temperature, pressure, speed, or other measurable conditions taken during manufacturing procedures to ensure the quality of the lot. Measurements will be monitored and documented. If a measurement does not meet established specifications, the lot in process will be quarantined while a Quality Assurance Agent reviews the deviation from established specifications. If the Quality Assurance Agent determines that the deviation will not cause the lot to fail to meet product specifications for identity, purity, strength, and composition, the deviation will be approved. If the Quality Assurance Agent determines that the deviation will affect the product's ability to meet company specifications, they will reject the deviation and the lot will be rejected and disposed of according to company protocols, unless a Quality Assurance Agent approves a treatment or adjustment of procedure that will allow the lot to meet company specifications for identity, purity, strength, and composition. All deviations, approvals, rejections, and alternative treatments or adjustments will be documented.

Solvent List

Jolly Green will only utilize solvents approved by the regulating authority and applicable to our license type. These solvents will have a purity of at least 99.5%. Jolly Green will use the following solvents:

- Carbon Dioxide



- Food grade glycerin, ethanol, or propylene glycol to create extracts

Each of the above solvents produces a different quality and quantity of final product, with different potencies, cannabinoid profiles and textures, resulting in a wide range of final products (see Product List below).

Standard Operating Procedures

Jolly Green's cannabis manufacturing facility has developed Standard Operating Procedures and associated training modules prior to producing extracts for the marketplace. The procedures below outline general guidelines Jolly Green's employees will consistently follow to manufacture premium, medical/pharmaceutical-grade cannabis products.

Method-specific SOPs are attached to this document as Appendices

Equipment Standards

- Documentation will be available to certify that each commercial-grade system utilized for the manufacture of cannabis products on premises has been



professionally designed, safe for its intended use, and built according to standards recognized and generally accepted in good engineering practices. The certification document will contain the signature and stamp of a professional engineer and serial number of the extraction unit being certified.

Potential sources of recognized standards include:

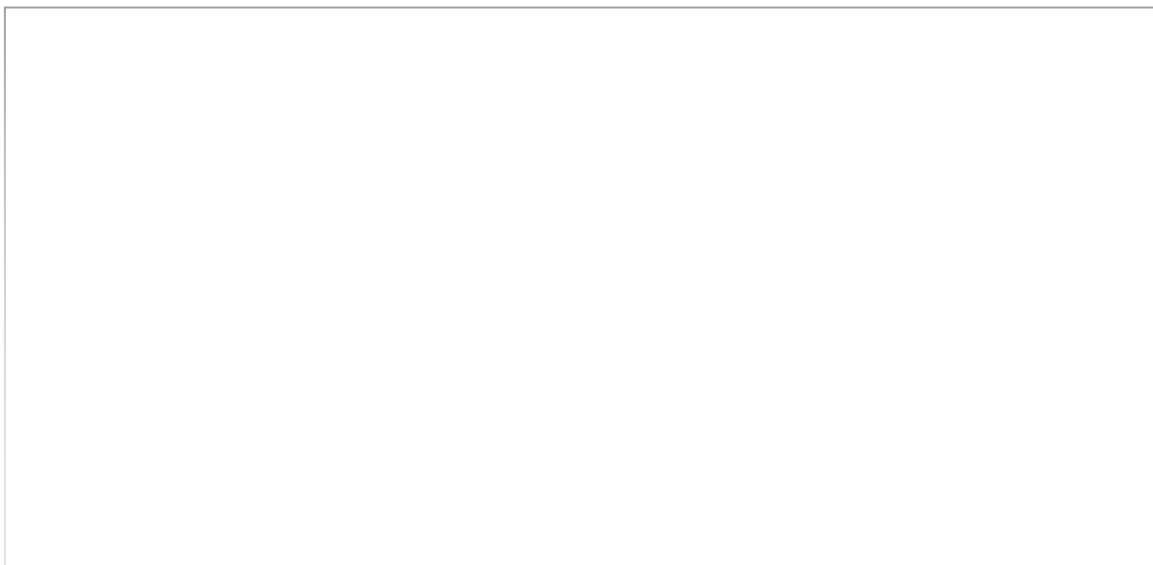
- American Society of Mechanical Engineers (ASME)
 - American National Standards Institute (ANSI)
 - Underwriters Laboratories (UL); or (iv) the American Society for Testing and Materials (ASTM).
- Closed loop systems for hydrocarbon or CO₂ extraction will bear a permanently affixed and visible model and serial number
 - Closed-loop systems, other equipment, operational methods and facilities will be approved for their use by the Fire Department and meet any required fire, safety, and building code requirements specified in the Massachusetts Building Reference Codes.
 - Any person using solvents or gases in a closed looped system to create cannabis extracts or otherwise in Jolly Green's facility will be fully trained on how to use the system and the risks involved in its use, have direct access to applicable safety data sheets, and handle and store the solvents and gases according to established protocols.



Product List

Jolly Green will manufacture the cannabis products listed in the table below.

Product Type	Description
Isolates/Distillates	THCA CBD Distillate
Concentrates	Dry Sift/Kief Rosin Wax/Shatter Bubble Hash Live Resin Vape Cartridges
Pre-Rolls	Individual Packaged (3 to 8 per package)

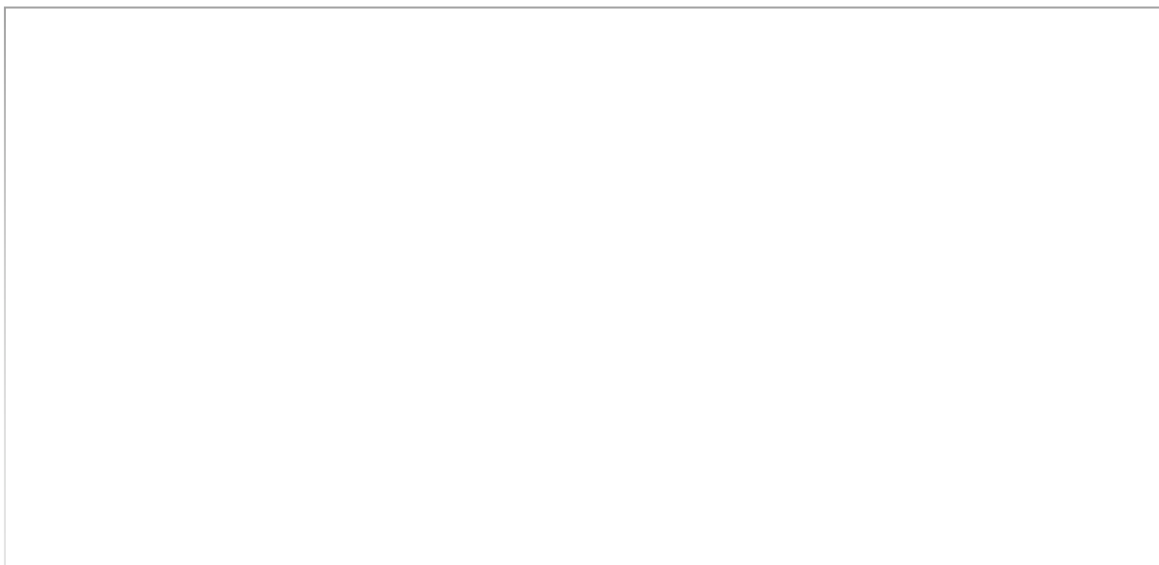


Other Derivative Products	Soft-gel Capsules Lotions/Ointments Transdermal Patches Pet Health Products
Edibles	Brownies Chocolates Gummies Infused Edible Oils and Capsules

Extraction Types - Overviews

Jolly Green will employ multiple extraction methods to create a full product line, including the following:

- Dry Sift/Kief Collection
- Bubble Hash Production



- Rosin Pressing
- Butter/Oil Infusion

Dry Sift/Kief Extraction

Kief, the dry resin glands of the cannabis plant, is collected as part of the flower trimming process. Kief can be collected from dried flower material using a centrifugal screened drum, or by shaking trim/flower on a mesh-screened sieve. Kief has the appearance of a golden dust, which is usually found at the bottom of a jar or bag of cannabis. Once the Kief has been separated from all green plant material, it is typically pressed into a brick or a ball. These collected dry resin glands can be consumed as-is, or can be further purified using a rosin press.

Bubble Hash Production

Bubble Hash, otherwise known as Ice Water Hash, is similar to Kief in that it is composed of the resin glands that have been mechanically separated from the plant material. The process of making Bubble Hash is what differentiates this product from Kief. Bubble Hash is made by mechanically separating the resin glands, aka trichomes, from the plant material by submerging the plant material in ice water and using agitation to free the frozen trichomes from the plant material. Water in this case is not a solvent because it does not dissolve the trichomes or cannabinoids. The ice water is simply



used to freeze the trichomes which makes them brittle, making them fall off of the plant material easily during agitation.

Whereas Kief is made from dried plant material, the plant material used to make Bubble Hash is typically frozen within a few hours after harvest and is kept frozen until the ice water extraction. After ice water agitation, the water containing the trichomes is filtered through a series of micron filters with pores of various sizes. These various filters allow the trichomes to be separated and collected based on their size, and oftentimes Bubble Hash is sold with a size indication as connoisseurs tend to prefer certain size trichomes over others due to differences in flavor and melting characteristics. After filtration, the Bubble hash is then dried via lyophilization. The Bubble Hash is then ready for consumption or can be further purified using a rosin press.

Rosin Press Extraction

Extraction using a rosin press is considered to be “solventless” because only heat and pressure are used to further refine THC oil from flower material or bubble hash. A rosin press consists of two metal plates that are heated. The flower or bubble hash is packed into a food grade fine mesh bag and placed between the metal plates. The plates apply a specific pressure and heat to the bag of flower or bubble hash. The heat and pressure break open the trichome heads and the oil, containing cannabinoids and terpenes, begins to bleed from the bag and is collected on parchment paper. The resulting oil is ready for consumption or it can be further refined with an application of low heat over the course of days or weeks to produce different consistencies. Premium Rosin is made by pressing bubble hash as opposed to flower.

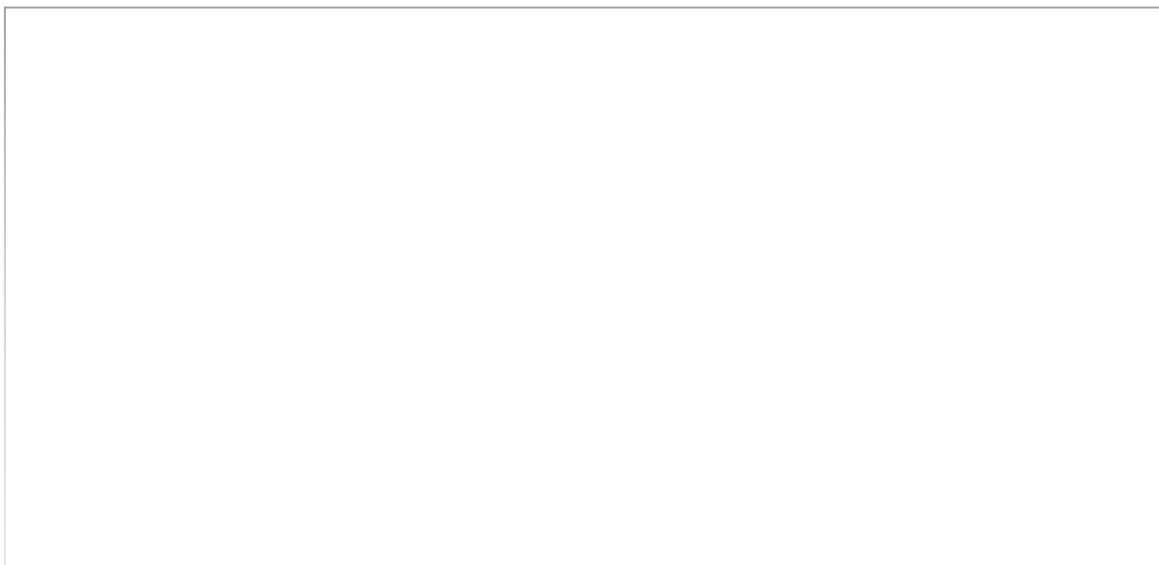


Butter/Oil Infusion

Cannabinoids are fat soluble, thus they will dissolve into the kinds of fats/oils that humans ingest such as butter, coconut oil, olive oil, sunflower oil, etc. This process typically starts out by decarboxylating, or activating, the plant material in the oven. Once the plant material is activated it is combined with the oil in a pot under medium heat. The cannabinoids are left to dissolve into the fat/oil over a period of 1-3 hours. Afterwards, the plant material is strained from the oil. The butter/oil can then be eaten itself as an edible or used to cook “infused” meals.

Ethanol Extraction

Ethanol is a highly effective solvent for extracting cannabinoids and terpenes from plant material. Although highly effective, it is more polar than most solvents used for cannabis extraction and thus is not as selective for the target molecules. This means that ethanol tends to extract more than the desired compounds, such as chlorophyll and waxes. The use of cold ethanol (approximately -40C), with determined soak/residence time on the plant material, helps to avoid extracting these impurities during the process of extracting the desired cannabinoids and decreases the need for further purification and processing. Most ethanol extraction systems now include Centrifugal motion which helps to separate the ethanol/cannabinoid solution from the plant material. Post-extraction, all ethanol is removed from the extract in a manner to recapture the solvent. The product at this stage is considered crude oil and can be further refined through distillation or chromatography.

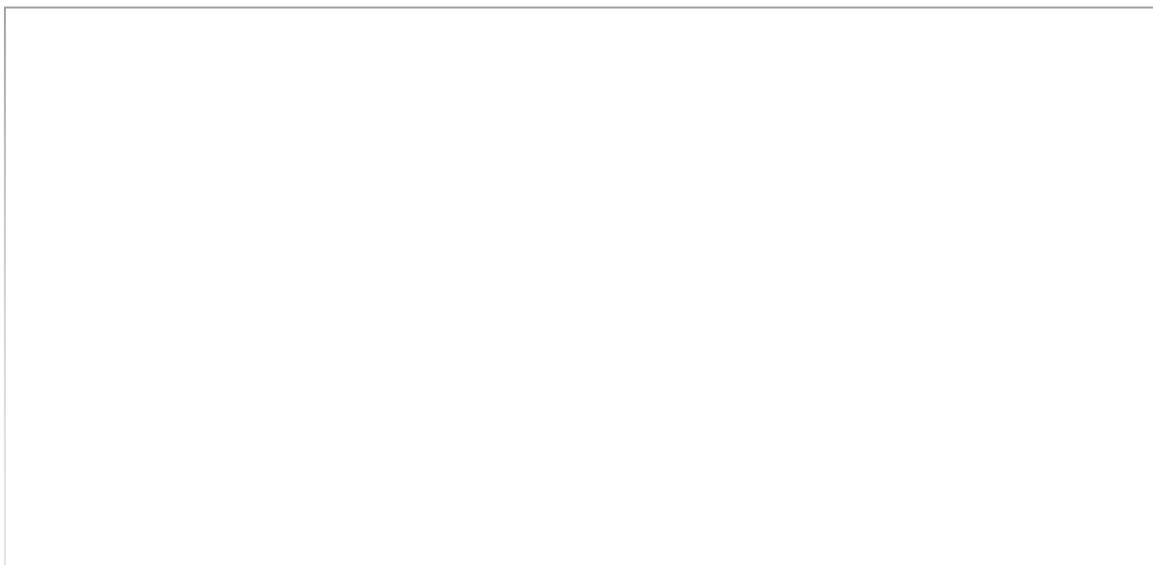


Co2 Extraction

The use of Carbon Dioxide as an extraction solvent is unique. CO2 must be brought to its subcritical or supercritical state to perform as a solvent. In this state CO2 acts as both a gas and a liquid, which allows for thorough saturation of the plant material and dissolution of the target molecules. In order for CO2 to reach its supercritical state and act as a solvent it must be compressed under high pressure and high temperature. CO2 extraction system allow the user to “tune” the pressure and temperature variables which makes CO2 extraction highly selective. The pressure and temperature parameters can be changed by the user to extract specific target molecules separately, for instance the operator can extract the terpenes first and then the cannabinoids. Because CO2 exists within our bodies and the air that we breathe it is considered a non-toxic solvent and readily evaporates from the resulting oil at room temperature. CO2 extraction tends to co-extract fats and waxes which are typically removed from the oil by dissolving the CO2 extracted oil in ethanol and freezing it which causes the waxes to separate from the rest of the oil. The ethanol is then separated and recovered from the oil, and the resulting oil is ready to be consumed.

Hydrocarbon (Propane, Butane) N/A

The term hydrocarbon refers to molecules that only consist of atoms of carbon and hydrogen. Alkanes are hydrocarbons that only have single bonds between their carbon atoms. Smaller chain alkanes such as propane and butane are typically used in extraction, however hexane is sometimes used as well although this is rare. Hydrocarbons are non-polar solvents, and with cannabinoids and terpenes being highly

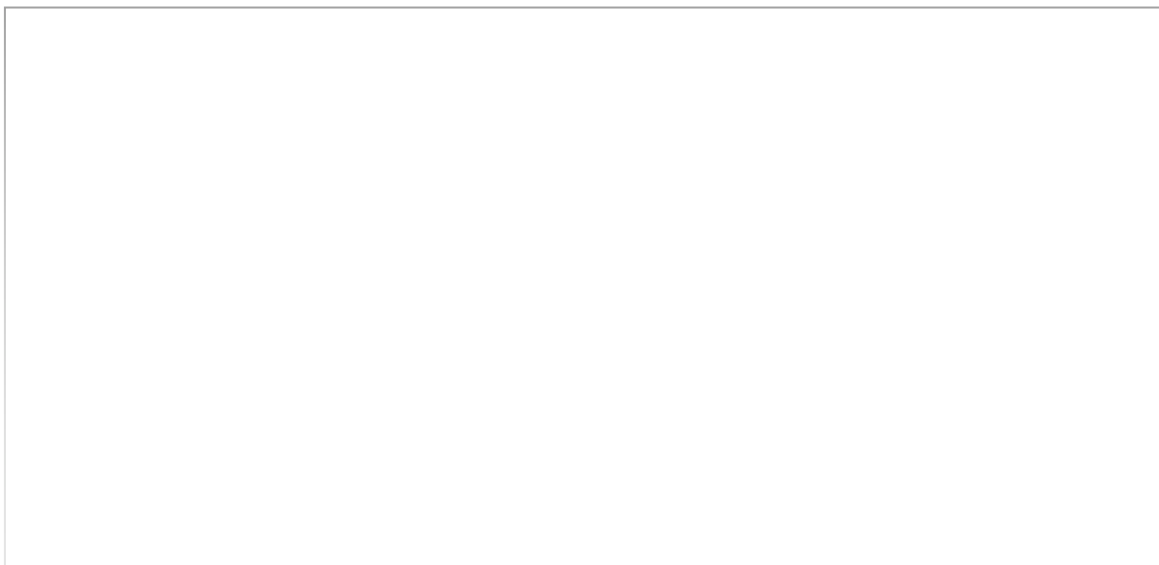


polar these solvents are quite selective for the target molecules. Propane, butane, or a blend of the two is passed through the plant material in a closed loop system. The gas dissolves the cannabinoids and terpenes, and is then collected in a heated collection vessel where the gas is boiled off and pumped back into its holding tank. The remaining oil must be further purified to remove and residual solvent that is left, which is typically done by the application of heat under vacuum in a vacuum oven. The oil can be processed into different consistencies such as wax, budder, shatter, live resin, or THCA crystals.

Preparation of Material to be Extracted

Grinding/Milling

Cannabis flower is often broken up or ground up prior to extraction. Breaking down the buds into finer pieces allows better penetration of the solvent during extraction which results in a higher potency product. This process can be done by running the cannabis through a grinder/mill machine that can break down the buds. These machines typically have screens that only allow particles small enough to fall through, ensuring that your buds are sufficiently ground. It is important to note that the plant material should not be too finely ground, avoiding a powder like consistency. After grinding/milling you can decarboxylate the plant material or proceed to pack the plant material into food grade mesh bags used to contain the plant material during extraction. One alternative to grinding the plant material is to pack your mesh bags and then break up the buds within by hitting the bag of plant material with a metal or wooden rod. Some processors



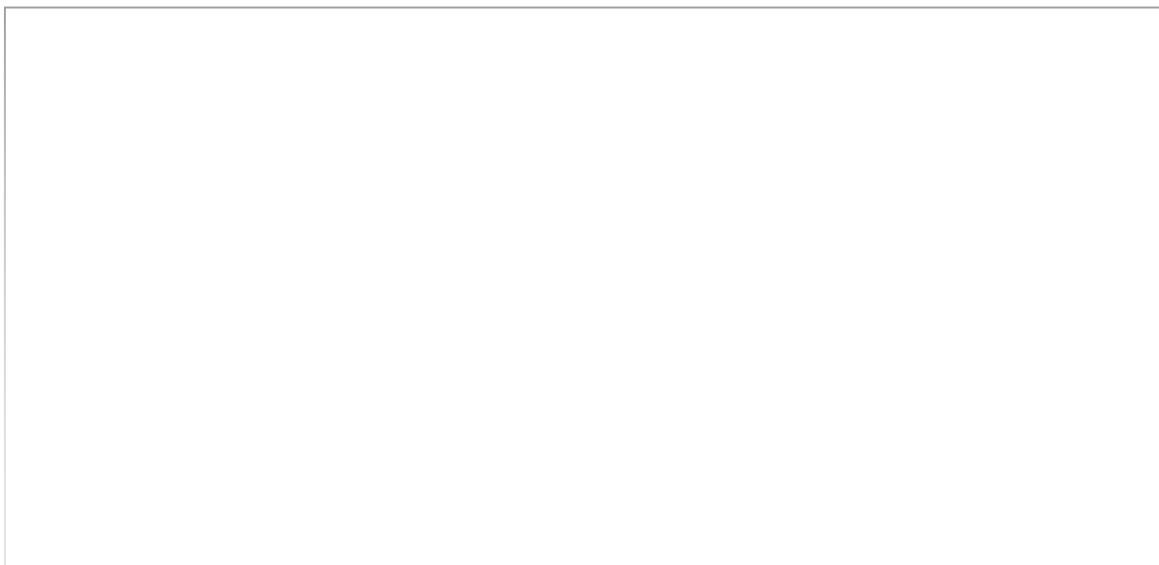
choose not to grind their cannabis flower at all, which is typical for methods utilizing whole plant fresh frozen cannabis.

Extraction Process Overview

All cannabis processing and manufacturing will take place within the designated manufacturing area and in compliance with all rules and regulations. Each day technicians will ensure that the manufacturing work space is clean and organized, and that the equipment has been inspected before use to confirm good working conditions.

The first step in the extraction process will be biomass preparation. Biomass weight and proper ID number are cross referenced with the info in the ICS tracking software to ensure accuracy and compliance. Biomass is then broken up or milled, and packed into mesh bags for extraction. The extraction equipment is inspected, pressure and vacuum tested, and then packed with biomass. Extraction will be performed as per the manufacturing orders for that day.

Depending on the method used, solvent may be recovered next. This may involve using a rotary evaporator or falling film evaporator if using ethanol, and involves passive or active recovery during the hydrocarbon process. This leaves the cannabis extract behind. The cannabis extract can then be further processed for specific consistency or refinement. This may include purging the extract in a vacuum oven, whipping the extract while applying heat, decarboxylating the extract in a reactor, or distilling the extract. At this point the cannabis extract may be ready for packaging, or it may be used to infuse other products that the company manufactures. Throughout this process all data will be collected for internal use and for compliance.




Workstations will be kept sanitary and organized, and all safety protocols will be strictly followed. Equipment will be maintained regularly and defects or malfunctions will be reported to management.

Pre-Extraction Decarboxylation SOP

SOP Number	Title of SOP	Version	Date Effective
		1.0 (Original)	1/1/2020
Author	Reviewer	Approved By	Date Approved
Future [Author Name], [Author Title]	[Reviewer Name], [Reviewer Title]	[Approver Name], [Approver Title]	MM/DD/YYYY

Purpose

The purpose of this SOP is to decarboxylate the THC in cannabis flower prior to extraction. The cannabinoids found in cannabis change when heated. At temperatures



between 220 and 280 degrees Fahrenheit, cannabinoids lose a carbon dioxide molecule, which converts them into different chemical compounds. This process is called *decarboxylation*. Before heating, cannabinoids are in acidic form, called cannabinoid acids. The medicinal properties of cannabinoid acids differ from those of decarboxylated cannabinoids. For example, the psychoactive cannabinoid delta-9-THC is not present in whole cannabis flowers until they are heated during the process of smoking or vaporization. The heat converts the cannabinoid acid THCA, a non-psychoactive compound, into the psychoactive compound delta-9-THC. Without decarboxylation to convert non-psychoactive THCA into psychoactive delta-9-THC, the medicinal effect is different. The same is true for other cannabinoids, including CBD and CBC.

Cannabis administered via inhalation, whether in the form of an extract or whole flower, is decarboxylated when heated into smoke or vapor. Cannabis concentrates developed for methods of administration other than inhalation may or may not be decarboxylated as part of manufacturing, depending on the desired medicinal effects of the final product as defined by company specifications. Decarboxylation is achieved by heating cannabis or a cannabis extract to a temperature between 220 and 280 degrees Fahrenheit for 30 to 60 minutes. The various cannabinoids decarboxylate at different temperatures and over different time periods. The length of decarboxylation will depend on the intended final product. For example, some products may be decarboxylated for a shorter time, leaving some THCA molecules intact. Other products may be decarboxylated for longer to ensure the decarboxylation of all CBD molecules, or to convert more THC into CBN to create a product with sedative qualities. After decarboxylation, the extract may be analyzed to assure the level of decarboxylation meets product specifications.



Materials

- Cannabis biomass
- Storage containers

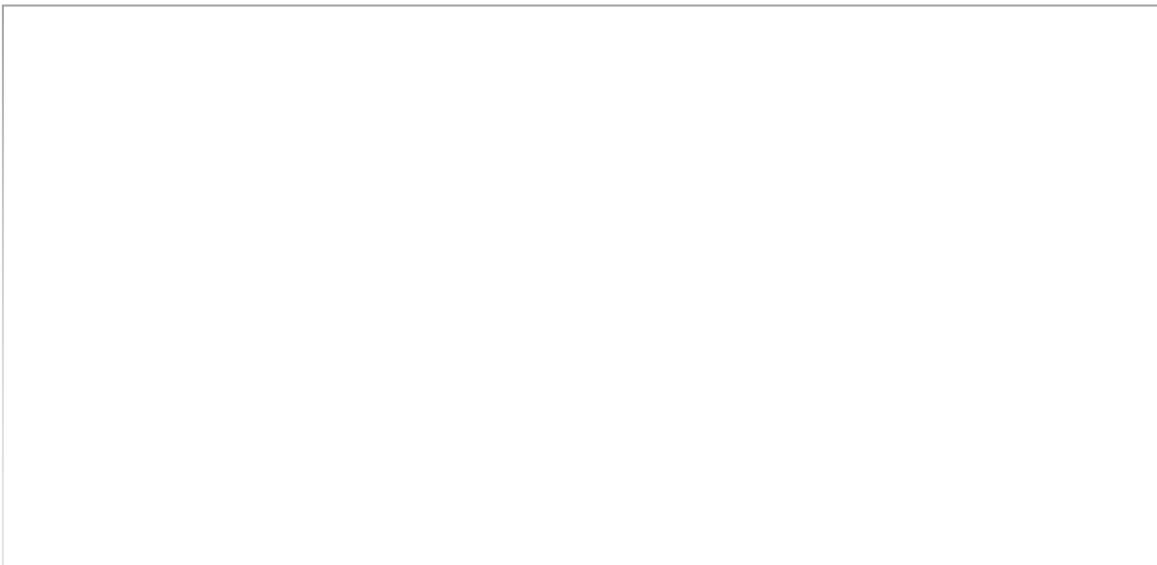
Equipment

- Baking trays
- Oven
- Timer
- Spatula

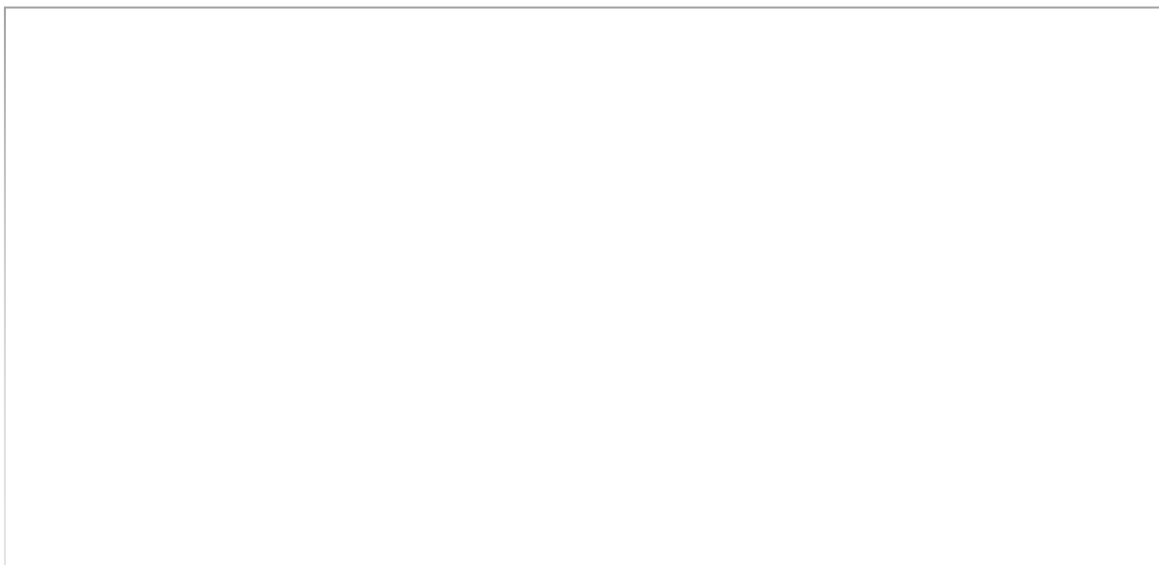
Procedure

Use a conventional oven to decarboxylate cannabis plant material prior to extraction.

1. Go to a workstation appropriate for decarboxylation.
2. Log in to ICS to view manufacturing order.
3. Put on PPE.
4. Place cannabis on the metal tray(s) and use fingers to reduce the plant material to pieces approximately 5 to 10 millimeters in size.



5. Preheat oven to the temperature indicated in the manufacturing order. High-THC strains will be heated at 240 degrees Fahrenheit for 120 minutes, and high-CBD strains will be heated at 285 degrees Fahrenheit for 120 minutes.
6. Once the oven is heated, place trays in oven and set timer for the time indicated on the manufacturing order.
7. When the timer goes off, remove cannabis from the oven and allow to cool for 15 minutes.
8. Use spatula and hands to remove cannabis from tray and place in a storage container.
9. Tare scale, weigh the contents of the container, and record weight in the ICS, following company SOPs for weighing cannabis.
10. Seal the container.
11. Print a label with identifying information about the cannabis and place on the container, following company SOPs for labeling cannabis for storage.
12. Mark manufacturing order completed in the ICS.
13. Store the container or transfer to appropriate extraction workstation, as indicated in the manufacturing order.

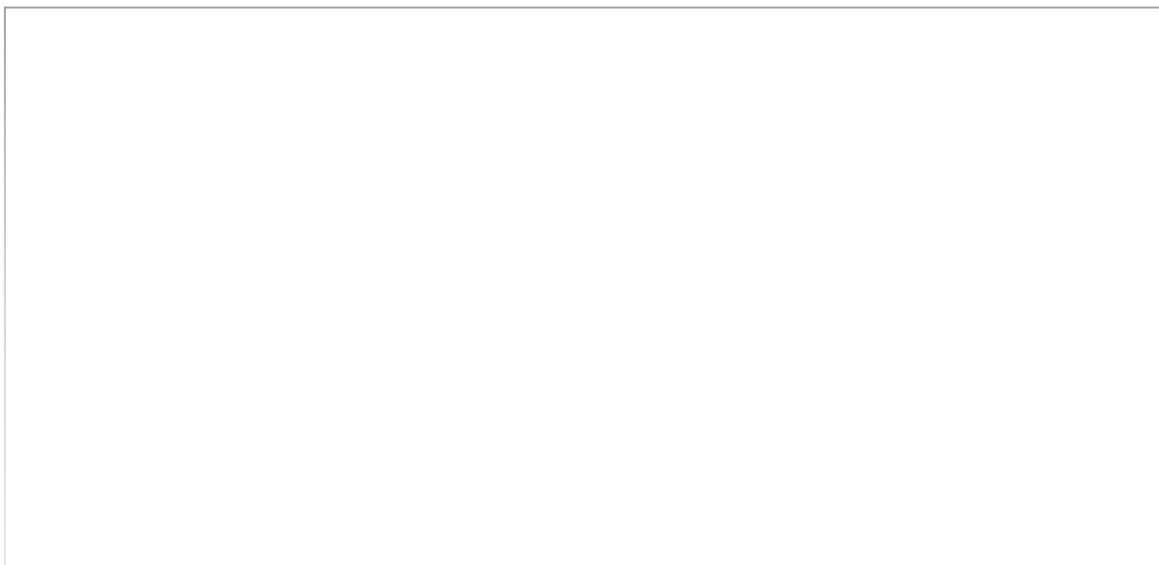


Post-Extraction Decarboxylation SOP

SOP Number	Title of SOP	Version	Date Effective
		1.0 (Original)	1/1/2020
Author	Reviewer	Approved By	Date Approved
Future [Author Name], [Author Title]	[Reviewer Name], [Reviewer Title]	[Approver Name], [Approver Title]	MM/DD/YYYY

Purpose

To decarboxylate cannabis extracts after they have been extracted from the plant material. Jolly Green may use a vacuum desiccator oven to decarboxylate cannabis resin after it has been extracted from plant material. Placing the extract under vacuum pressure means less heat is required for decarboxylation, preserving the fragile terpenes, terpenoids, and flavonoids that would otherwise break down under the full heat required for decarboxylation.



Materials

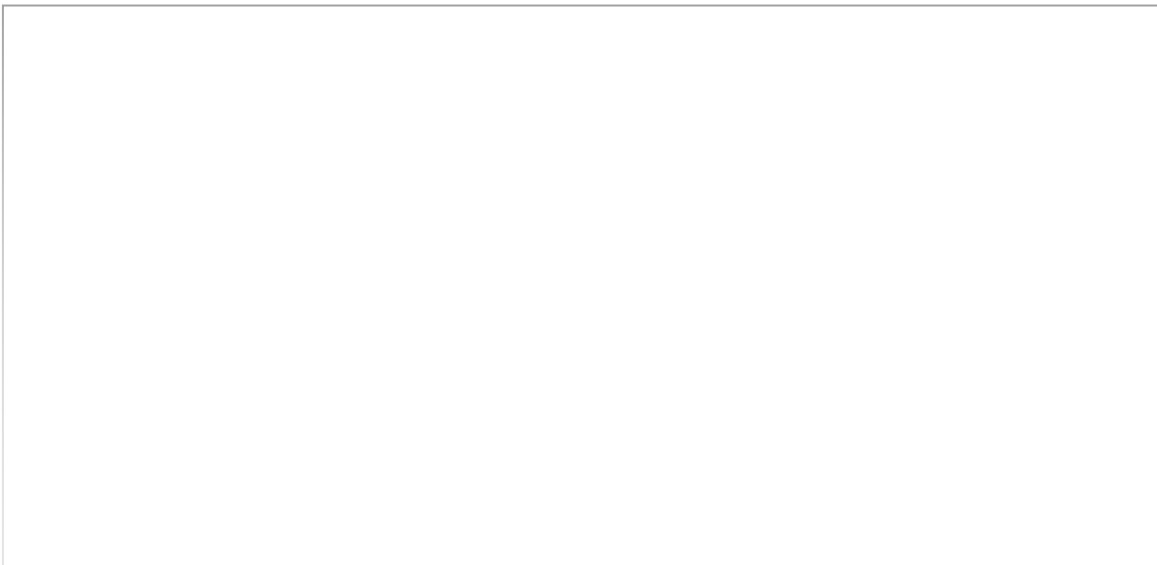
- Cannabis extract
- Storage containers

Equipment

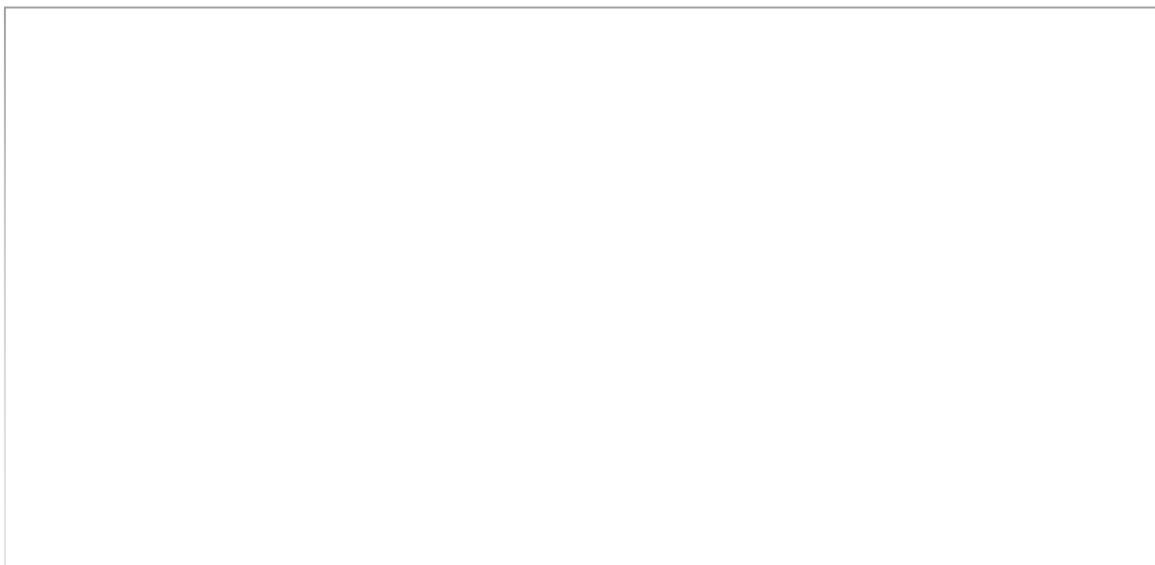
- Pyrex dishes
- Vacuum oven
- Vacuum pump
- Spatula

Procedure

1. Go to a workstation appropriate for decarboxylation.
2. Log in to ICS to view manufacturing order.
3. Put on PPE.
4. Spread extract into Pyrex dish(es) in an even layer no more than 1/8 inch thick.
5. Place dish(es) in vacuum oven and seal the door closed.
6. Ensure that the oven is set to the proper temperature as indicated in the manufacturing order.
7. Allow the extract to warm up for 20 minutes before applying vacuum.
8. Close the vacuum oven vent and open the vacuum valve.



9. Turn on pump if it is not already on, allow pressure to decrease as indicated in the manufacturing order
10. As the pressure drops due to vacuum, keep an eye on the extract ensuring that it does not bubble over. This can create a mess in your vacuum oven. If the extract is bubbling too much, close the vacuum valve and open the vent slightly to reduce vacuum which will reduce the bubbling. If this happens, slowly reduce the pressure until you can leave the vacuum valve open without the extract bubbling over.
11. Adjust temperature in the oven as indicated in the manufacturing order.
12. Leave extract in oven for the length of time indicated in the manufacturing order, or until bubbles stop forming.
13. Turn off the vacuum pump and close the vacuum valve.
14. Open the vacuum oven vent to return to atmospheric pressure within the oven.
15. Turn off oven and remove dish(es).
16. Allow extract to cool.
17. Use a spatula or other instrument to remove extract from Pyrex dish.
18. Place extract in food-safe storage container.
19. Tare scale, weigh the contents of the container, and record weight in the ICS, following company SOPs for weighing cannabis.
20. Seal the container.

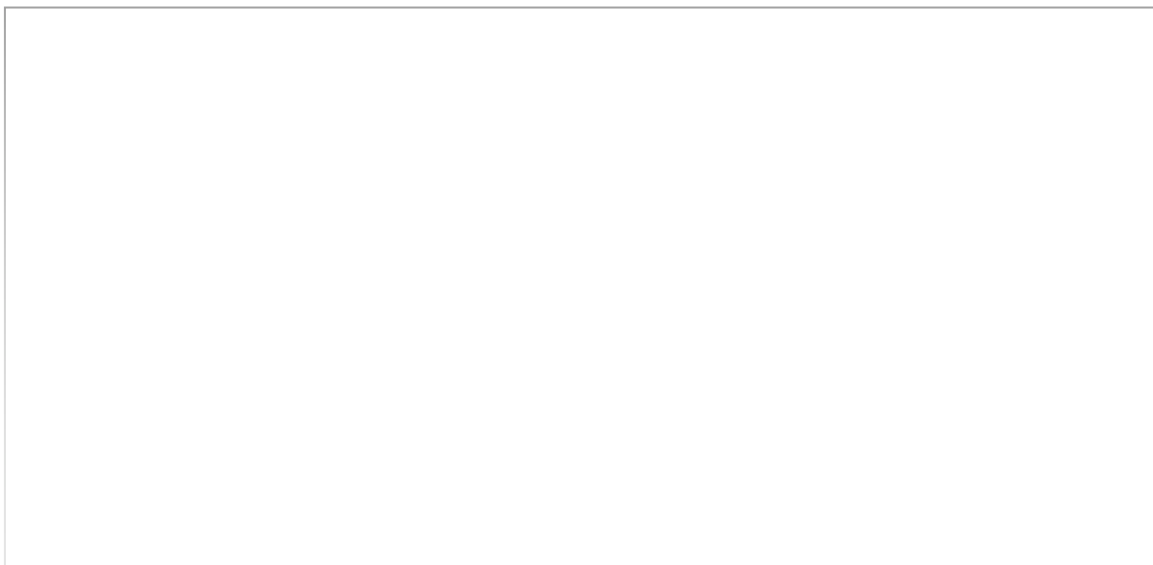


21. Print a label with identifying information about the cannabis and place on the container, following company SOPs for labeling cannabis for storage.
22. Mark manufacturing order completed in the ICS.
23. Store the container or transfer to appropriate extraction workstation, as indicated in the manufacturing order.

Purification

After performing the initial extraction of phytochemicals using the procedures described in this plan, use the appropriate following post-extraction method and procedure to refine, purge, and/or activate the cannabis resin. These processes may be necessary or optional, depending on the extraction method used and the cannabis-infused product being made.

Post-extraction purification begins with the process of Winterization. Winterization is carried out by mixing the cannabinoid-rich extracted solution with food grade ethanol and is then placed in a freezer at low temperatures (the lower the temperature, such as in a low-temp lab freezer, the faster this process occurs) in order to allow waxes to precipitate from the solution. Once the waxes have separated from the extract/ethanol tincture it is then filtered to remove the waxes and any plant material. Progressively finer grades of micron filter paper will remove waxes to purify the solution even further. Falling film and rotary evaporator technology will separate the ethanol from the refined crude product. After separation, the crude will be decarboxylated under heat and manual agitation before it is fractionally distilled. Fractional distillation will refine the

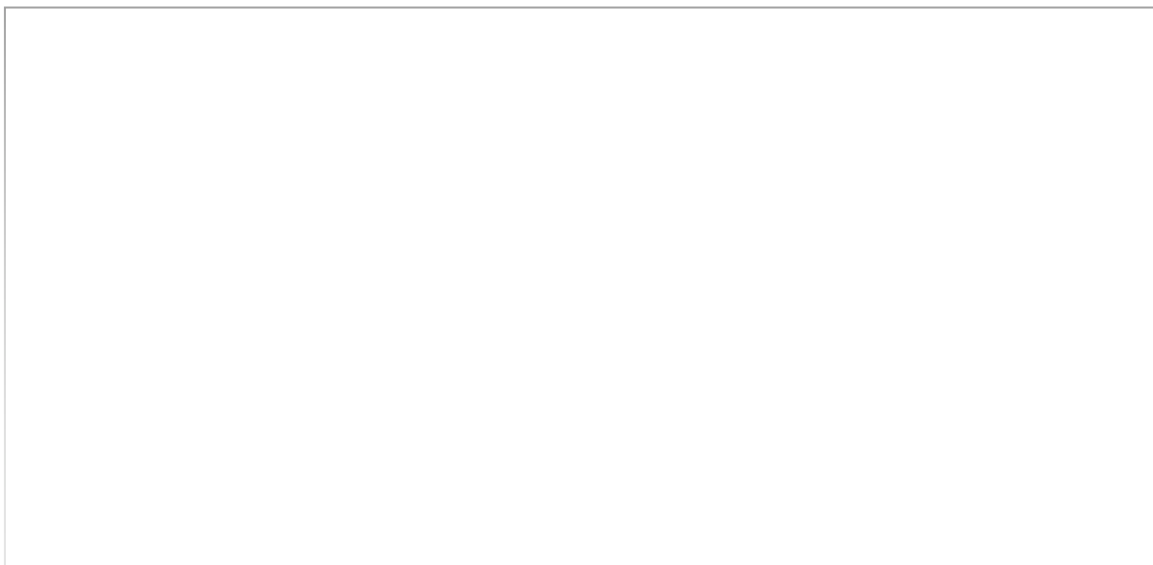


product to achieve 85%+ delta-9-THC potency with desired total cannabinoids in 90%+ range.

Parts per million for one (1) gram of finished extract produced in [Company]'s cannabis manufacturing facility will not exceed five hundred [5] parts per million of residual solvent or gas when quality assurance tested.

Extraction Equipment List

#	Description	Manufacturer, Model	Size (Rounded up)	Electrical Power Requirement	No. of Units Needed
1	Winterization-Cryo Freezer	Revco Ultima II	45" x 35" x 76"	240V, 10 Amps	
2	Edwards Vacuum Pump	E2M30	23" x 7" x 11"	240V, 5 amps	
3	Huber -90 +200 Unistat Chiller	Huber Unistat 405	17" x 12" x 25"	240v, 18.5 amps	
4	Water Heater/Recirculator	Polyscience MX Immersion Circulator	5" x 3.8"x 14.1" in	120v, 10 amps	



5	Ethanol Crude Extractor System	Delta Separations CUP15	25" x 37"	240v, 30 amps	
6	Drum Scale to Weigh Solvent Tanks	DigiWeigh DWP1000L	29" x 14" x 6.5"	Battery Operated	
7	N/A Ethanol extraction - Rotary Evaporator 50 Litre	Ai SolventVap 50L	46" x 28" x 58"	220v, 29 amps	
8	Diaphragm Pump 6.1 cfm	Welch 6.1 cfm Full Chemical- Resistant 8-Head Diaphragm Pump	21" x 10" x 12"	110v, 5.9 amps	
9	PolyScience Chiller 1.5 HP	Polyscience DuraChill 1.5HP Chiller	30.5" x 19" x 26"	240v, 23.1 amps	
12	Vacuum Ovens	AI 220 3.2	30.5" x 24" x 29"	220v, 6.8 amps	
13	Hot Plate	Waverly HS2-S	10.2" x 6" x 3.2"	110v, 4.68 amps	
14	Overhead Stirrer	R100c	12" x 12"	110v, 2.72	



			(estimated)	amps	
15	Separatory Funnel	5L	12" x 12"	N/A	
16	Winterization - Buchner Funnel	12"	18" x 18" (estimated)	N/A	
17	Air Compressor	Husky 60 gallon	29" x 33" x 72"	240v, 15 amps	
18	N/A Ethanol extraction- FFE Ethanol Recovery	Delta Separations	36" x 96" 114"		
19	Decarb Reactor kit	Cedarstone 100L		460V, 11 Amps	
20	Wiped Film Distillation - RFD-27	Delta Separations			
21	Closed Loop Hydrocarbon Extraction system	ETS			



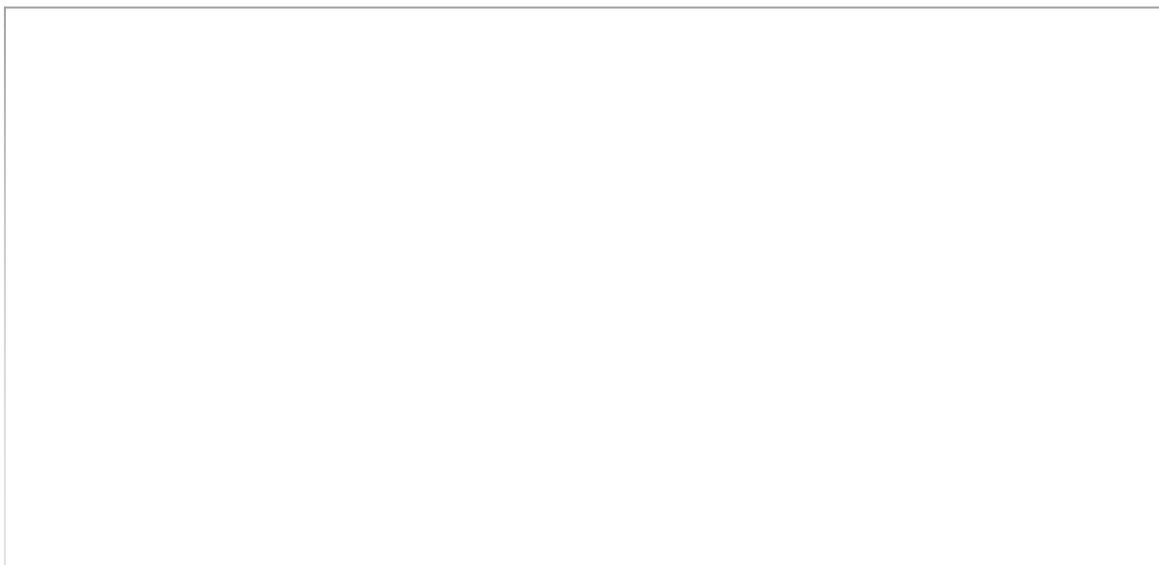
	- ETS MEP				
	Hydrocarbon extraction- Air driven recovery pump	Haskell			

Kitchen and Formulations Equipment List

#	Description	Manufacturer, Model	Size (Rounded up)	Electrical Power Requirement	No. of Units Needed
1	Refrigerator	Avantco A-49R- HC	54"	115V, 1/4HP	1
2	Pharmaceutical Freeze Dryer	Harvest Right		110V, 16A	1
3	Walk-in Freezer	NorLake KLF7768-C	6'x8'x7'7"	208, 1 HP	1
4	Ovens/Stovetops	Garland 36ES33	36"x36"	240, 31A	1



5	Walk-in cooler	NorLake KLB68-C	6'x8'x6'7"	208, ¾ HP	1
6	Range Hood	ProLine	36"	110V	1
7	Depositor	Truffly made		110-240V	1
8	Hot Plates	Corning PC 400D		120V	2
9	Chocolate Tempering Machine	Chocovision revolution delta		110V	1
10	Cooling table	Savage Bros cooling table	30"x60"		1
11	20 qt Mixer	Avantco MX20		120V	1
12	Immersion Blender	Waring WSB60		120V	1
13	Commercial stainless steel Blender	Avamix BX1GRG		120V	1
14	Demolder	Truffly Made			
15	Dishwasher	Noble		208/230V, 1HP	



		Warewashing HT-180			
16	Triple sink	Regency	94"		
17					

Dosing Calculation and Oil Preparation SOP

SOP Number	Title of SOP	Version	Date Effective
		1.0 (Original)	1/1/2020
Author	Reviewer	Approved By	Date Approved
[Author Name], [Author Title]	[Reviewer Name], [Reviewer Title]	[Approver Name], [Approver Title]	MM/DD/YYYY

Purpose

To infuse products with the proper dose based on the potency of the cannabis oil being used, the target dose per piece, and the size of the batch being dosed.

Materials

- Cannabis oil

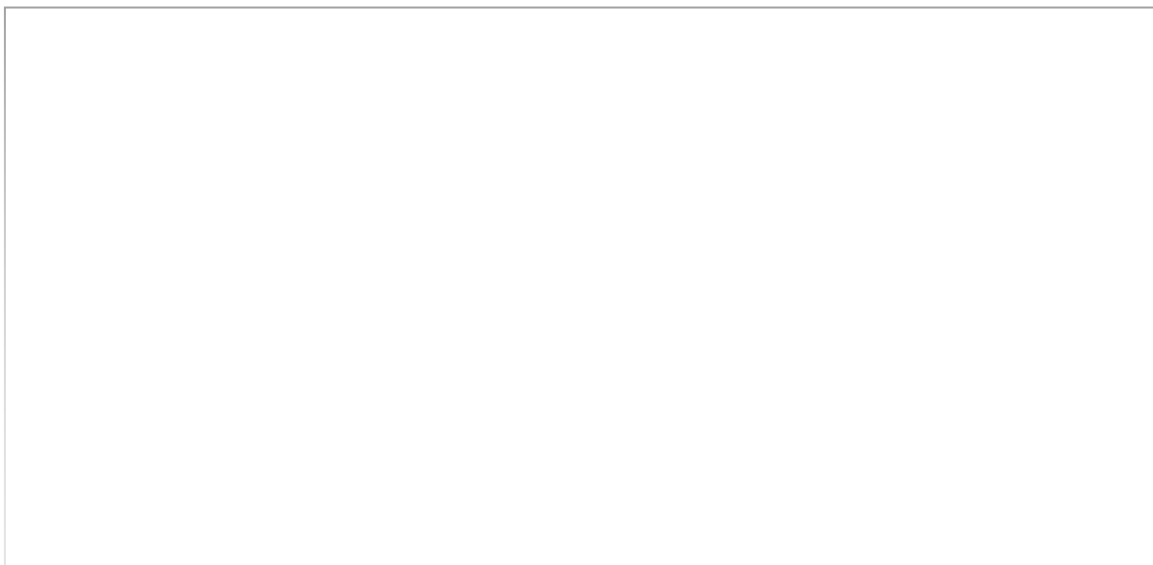
Equipment

- Hot plate
- Scale
- Clean beaker
- Calculator

Procedure

1. Log into ICS and pull up manufacturing order. This will provide the dosage and batch size of the infused product to be made.
2. Pull up the CoA for your cannabis oil. This will provide potency information.
3. For Example: your cannabis oil is 90% THC. That means that there is 900 mg of THC per gram of cannabis oil, because a gram is equal to 1000mg.

$$1000mg/g \times 90\% THC = 900mg THC \text{ per gram of oil}$$



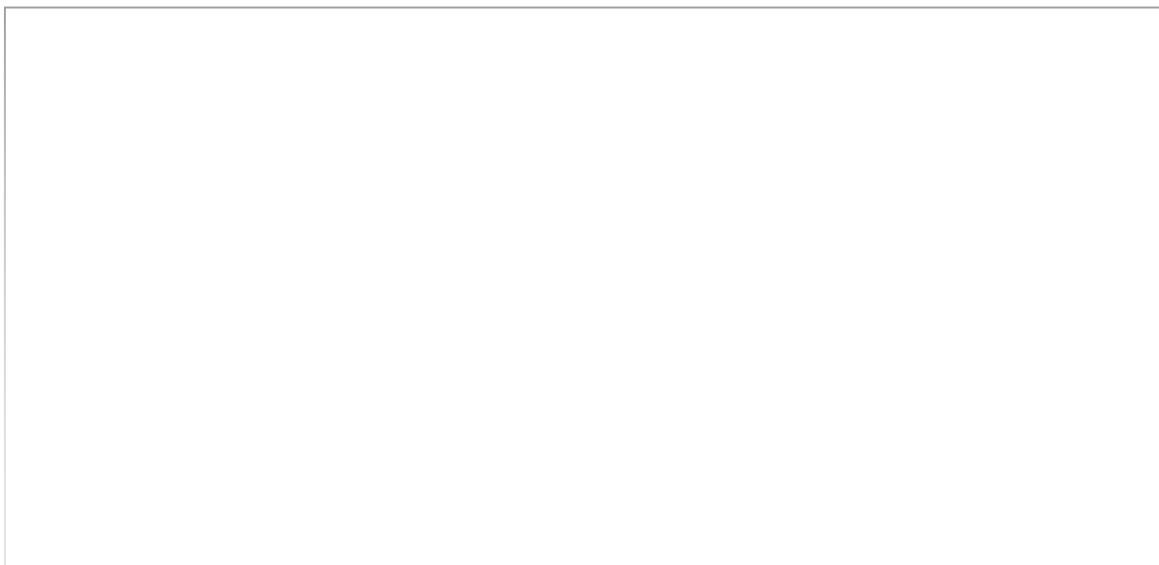
4. Calculate how many mg of THC are in your oil following the example in step 3.
5. From this information we can determine how much oil to use in our recipe.
6. For Example: The manufacturing order calls for a batch of gummies to be made at 10mg per gummy and a batch makes 150 gummies.

$$10mg/gummy \times 150 gummies = 1500mg \text{ THC per batch}$$

7. Calculate the total mg of THC needed for your recipe following the example calculation in step 6.
8. For Example: This batch of gummies requires 1500 mg of THC in total for the recipe and our cannabis oil is 90% THC. We will use the following equation to determine how much oil to use.

$$1500 \text{ mg} \div 900mg \text{ THC/gram of oil} = 1.67 \text{ grams of oil per batch}$$

9. Calculate the total grams of cannabis oil to add to your infused product recipe by following the example in step 8.
10. Place a glass container of cannabis oil on a hot plate and set to approximately 80-100C.
11. Allow cannabis oil to warm up.
12. Place a clean beaker of appropriate size on the scale.
13. When the cannabis oil is warm enough and has reached a pourable viscosity, pour the desired amount into the clean beaker on the scale, using the scale to



ensure that you pour only as much oil as is needed for your infused product recipe.

14. Remove the glass container of the cannabis oil from the hot plate, seal and return to storage.
15. Record the amount of oil taken from the container for this recipe.
16. Place the beaker with the oil to be used on the hot plate and turn down to 50-60C.
17. Let oil sit and remain warm until ready to mix into your recipe.
18. For recipes that require a tincture, remove beaker from hot plate and add ethanol to the beaker in a 6:1 ratio of oil to ethanol.
19. Stir thoroughly to dissolve all of the oil in the ethanol.
20. The oil or tincture are now ready to be added to the infused product recipe.

Winterization SOP

SOP Number	Title of SOP	Version	Date Effective
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		1.0 (Original)	1/1/2020
Author	Reviewer	Approved By	Date Approved
[Author Name], [Author Title]	[Reviewer Name], [Reviewer Title]	[Approver Name], [Approver Title]	MM/DD/YYYY

Purpose

During extraction, plant lipids may be pulled from cannabis along with phytochemicals. To create a product with higher cannabinoid concentration, Jolly Green may choose to winterize an extract to remove plant lipids. Winterization is achieved by combining an extract with ethanol, placing the mixture in a freezer to coagulate the plant lipids, and then pouring it through a filter to remove the coagulated lipids. The ethanol is then evaporated out of the mixture in a rotary evaporator and purged from the extract in a vacuum desiccator oven, leaving behind an extract that is free of both alcohol and plant lipids.

Definitions

- Lipids - fats and waxes that are co-extracted with the cannabinoids.
- Buchner funnel - a funnel used with filter paper to filter out solids from liquids.
- Rotary Evaporator - a machine used for solvent recovery that has a flask on one end that spins in a warm water bath, heating the liquid inside to evaporate it.



Once evaporated, that gas is pulled by vacuum through the machine to a condenser where it condenses into a liquid and is collected, thus removing that liquid (typically solvent) from the initial mixture.

Materials

- 190-proof organic ethanol
- Cannabis extract, as indicated in the manufacturing order

Equipment

- Food-safe storage container
- Glass container
- Grade 1 lab filters (11 microns)
- Buchner funnel, Erlenmeyer flask with vacuum arm, and sealing ring
- Sterile Pyrex tray(s)
- Scraping tool
- Sterile metal tray(s)
- Parchment paper
- Thin film spatula

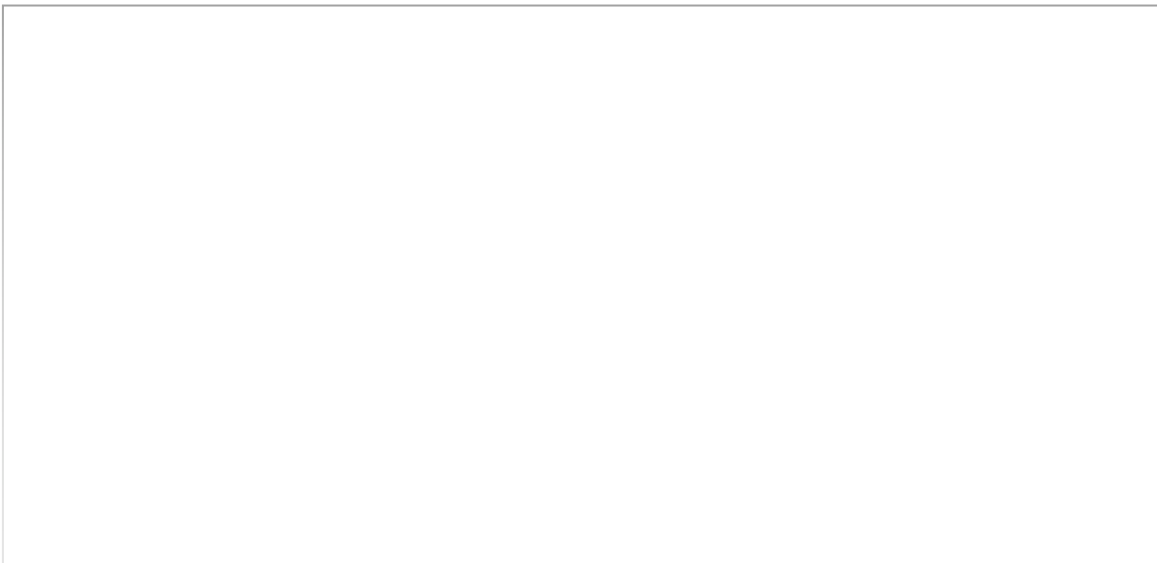


- Personal Protective Equipment (PPE)
- Cold-ethanol squirt bottle
- Rotary Evaporator and associated chiller/vacuum pump

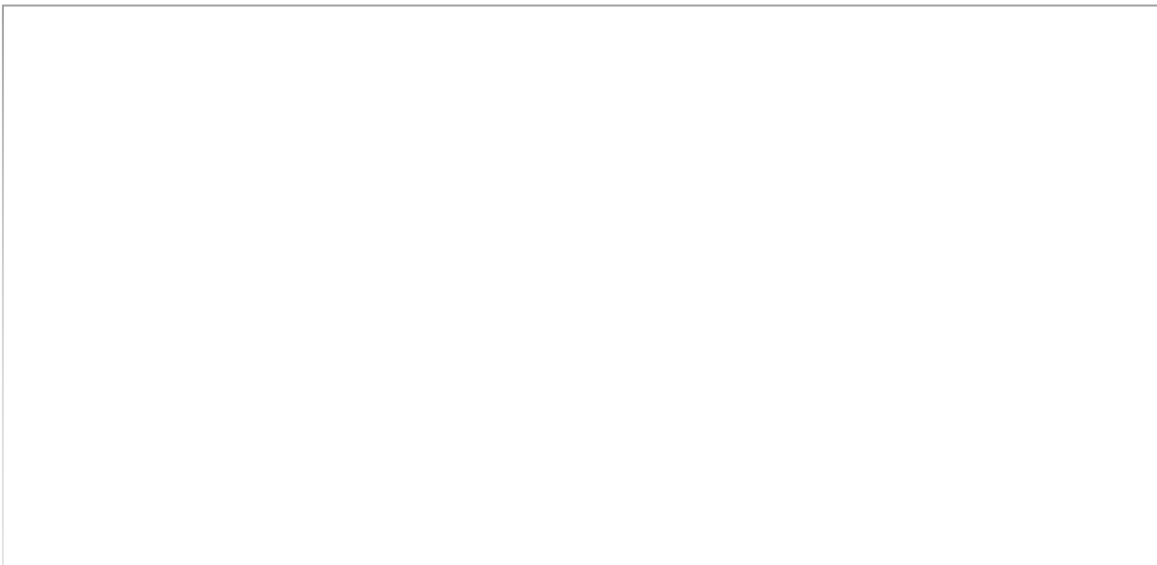
Procedures

Preparation

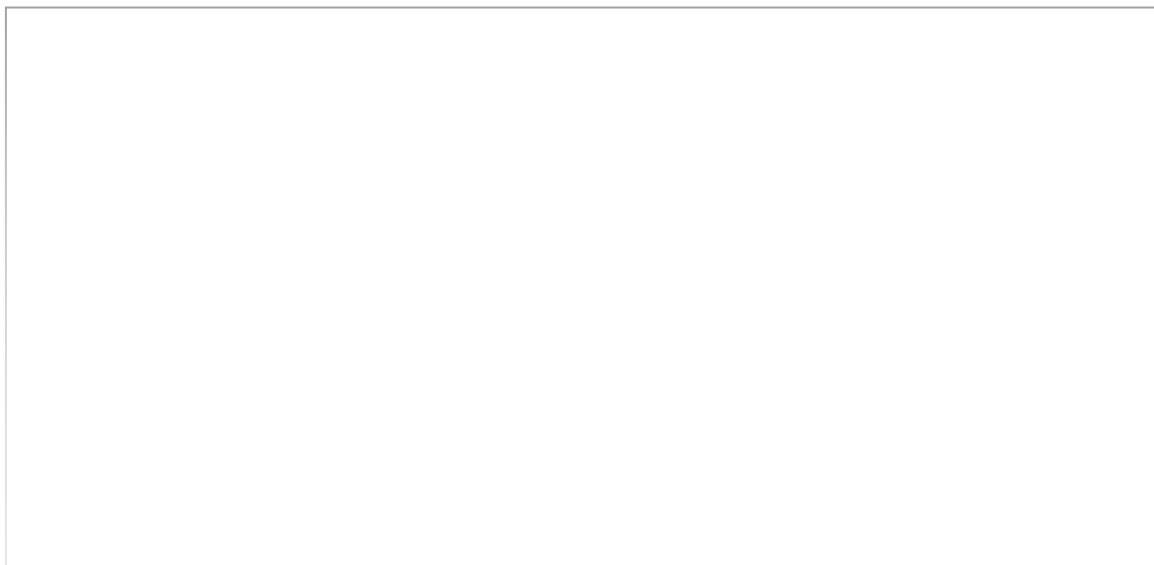
1. Go to a workstation appropriate for winterization.
2. Log in to ICS to view manufacturing order
3. Put on PPE.
4. Place extract in glass container.
5. Mix the ethanol and extract in a 4:1 ethanol: extract ratio in a glass container.
6. Seal container and shake until extract is completely combined with ethanol.
7. Place the mixture in the freezer with an ambient temperature of at least 0 degrees Fahrenheit. The colder the better, so if you have a low temp freezer you should use it for this process.
8. Assemble Buchner funnel, flask, and ring according to the manufacturer's instructions. Keep funnel and flask in freezer until you are ready to use it. Keeping these items cold helps to prevent lipids from liquifying and making it past the filter.



9. Place a filter in the Buchner funnel.
10. Connect the vacuum pump to the Buchner flask according to manufacturer's instructions.
11. Check the temperature of the mixture in the freezer. Once ethanol has stabilized to between 0 and 5 degrees Fahrenheit and plant lipids are visibly separated, remove from the freezer.
12. Turn on vacuum pump according to manufacturer's instructions.
13. Squirt cold ethanol on the filter to pre-wet it prior to adding your ethanol/extract mixture.
14. Pour mixture into Buchner flask slowly until all the liquid has passed through the filter. If the filter becomes clogged with wax, turn off the pump and replace with a new filter. Discard or save filters as indicated in the manufacturing order.
15. Continue filtration as needed. If the liquid is moving slowly through the filter, place the ethanol/extract mixture back in the freezer until you are ready to pour more in the funnel.
16. Once all of the wax has been filtered from the mixture, turn off the vacuum pump and remove the funnel from the flask.
17. Transfer the resulting liquid from the flask to the rotary evaporator, filling the round bottom evaporator flask only halfway full or according to manufacturer's instructions.
18. Set temperature and pressure as recommended by manufacturer for ethanol.



19. Ensure that the chiller is running at the appropriate temperature and fluid is moving through condenser coils.
20. Allow extract liquid to warm up in the rotary evaporator for approximately 20 minutes before you begin evaporation.
21. Turn on rotor motor of the rotary evaporator to begin spinning the evaporator flask.
22. Turn on the vacuum pump and close the vacuum vent on the rotary evaporator, applying vacuum to the warm ethanol/extract mixture. Keep an eye on the liquid and make sure that it does not boil over or “bump”. If the solution is boiling too rapidly, reduce vacuum by opening the vacuum vent slightly.
23. Allow the rotary evaporator to run until the mixture turns black/brown/amber to in color and thickens until just barely pourable.
24. Turn off rotary evaporator and remove flask.
25. Pour contents into Pyrex dish. Use a heat gun to heat the outside of the flask if your extract does not pour out entirely.
26. Place Pyrex dish in vacuum desiccator oven and seal the door closed.
27. Close vacuum vent and turn on vacuum pump and bring the pressure to the level indicated in the manufacturing order, following the manufacturer’s instructions for solvent collection.
28. Turn on vacuum oven and adjust temperature as indicated in the manufacturing order.



29. Once all ethanol has been removed, as indicated by the absence of bubbles forming, turn off the vacuum oven, remove dish(es), and allow to cool enough to handle.
30. Line sterile metal tray with parchment paper.
31. Use scraping tool to remove extract from the dish and place on parchment paper.
32. Place the tray in the vacuum desiccator oven at the temperature and pressure indicated in the manufacturing order. Leave in oven for 12 hours.
33. Turn off oven, don PPE, and remove tray(s).
34. Allow extract to cool.
35. Carefully peel extract from parchment paper and place in a food-safe storage container.
36. Tare scale, weigh the contents of the container, and record weight in the ICS, following company SOPs for weighing cannabis.
37. Seal the container.
38. Print a label with identifying information about the cannabis and place on the container, following company SOPs for labeling cannabis for storage.
39. Mark manufacturing order completed in the ICS.
40. Store the container or transfer to appropriate extraction workstation, as indicated in the manufacturing order.

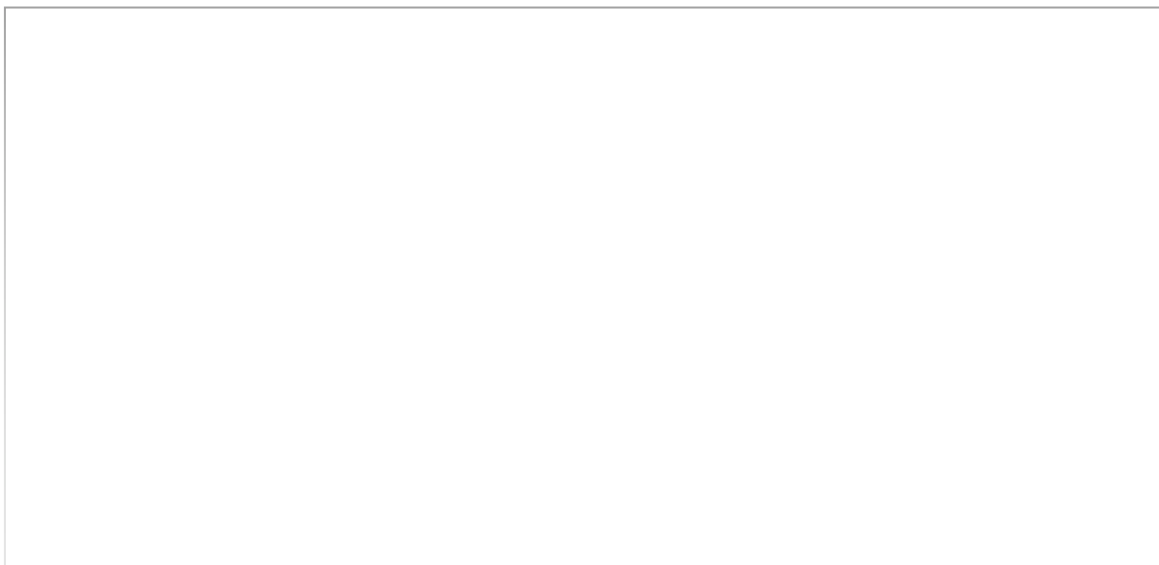


Residual Solvent Removal

The methods used to decarboxylate and winterize an extract will also remove residual solvents and moisture. It is Jolly Green's policy to ensure that all concentrates have a residual solvent content of below 500 ppm per one gram of extract.

Infusion/Formulation Operations Overview

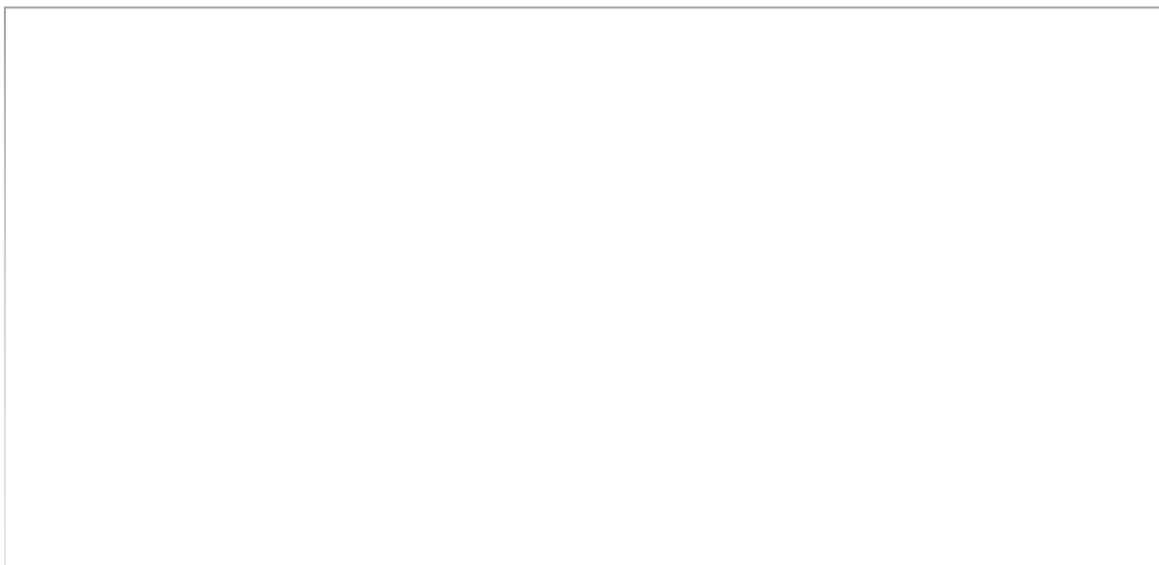
Jolly Green will use purified THC and CBD oil as the primary active ingredient in several derivative products, including lotions, ointments, beverages, gummies and capsules. Infusion of products allows cannabis to be consumed in multiple ways and gives consumers an option other than inhalation. Some of the products are for oral consumption such as beverages, gummies, capsules, and baked goods. When cannabis is consumed orally it tends to provide an effect that is stronger and lasts longer, which is very important for patients who use cannabis to treat symptoms of serious illness. Other infused products may be used topically applied to the skin, such as salves and lotions. When applied topically cannabis can provide pain relief to sore and aching muscles, and can be very therapeutic for those suffering from arthritis, psoriasis, or other forms of chronic pain.



Cannabis distillate is typically the best form of cannabis oil to use for infusion. Distillate has less of a “hashy” taste than other forms of concentrates, has a higher potency, is already decarboxylated or “activated”, and tends to mix well. A tincture made with distillate and ethanol works well for blending the cannabis oil homogeneously into certain mixtures such as candy recipes. Infused products can be made in a range of dosages, with 10mg THC being the standard dose for oral consumption, but it can range from 2.5mg-100+mg.

Cannabis product manufacturing can take place in environments similar to that of a restaurant kitchen or that of a supplement manufacturing facility. The production of edible products such as baked goods, gummies, and beverages may be made in a kitchen environment. Products such as topicals, soft gel capsules, tinctures, and vapes are typically made in a laboratory manufacturing environment similar to how supplement products are made. This kind of manufacturing typically utilizes automated lines of equipment, especially for packaging.

Jolly Green’s infused products will be manufactured in compliance with any and all dosing regulations set forth by the state.



Comprehensive Security & Procedures Restricting Access to Individuals 21 Or Older



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Jolly Green Inc. Hours of operation are Monday through Sunday 6 am to 7 pm. After hours contact information: Kyle Higgins cell 978-502-3740

Restricting access to individuals 21 or older:

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.
3. All consumers entering a marijuana retailer must be 21 years or older unless the establishment is co-located with a medical marijuana treatment center. 935 CMR 500.050(5)

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Addendum- Security Plan related to the CCC regulations

1. Jolly Green shall adopt procedures to prevent loitering and ensure that only individuals engaging in activity expressly or by necessary implication permitted by 935 CMR 500.110(1) Adult Use of Marijuana and its enabling statute are allowed to remain on the premises.
2. Jolly Green shall dispose of marijuana in accordance with 935 CMR 500.110(1) & 500.105(12).
3. No fewer than two (2) establishment agents must witness and document how waste is disposed in accordance with 935 CMR 500.110(1) & 500.105(12)
4. Jolly Green shall store all finished marijuana products in a secure, locked safe or vault in such a manner as to prevent diversion, theft and loss in accordance with 935 CMR 500.110(1)
5. Jolly Green shall keep all security equipment and locks in good working order in accordance with 935 CMR 500.110(1).
6. Jolly Green shall prohibit keys, if any, from being left in locks or stored in a location accessible to persons other than specifically authorized personnel in accordance with 935 CMR 500.110(1)
7. Jolly Green shall prohibit accessibility of security measures, such as combination numbers,

passwords or electronic or biometric security systems, to persons other than specifically authorized personal in accordance with 935 CMR 500.110(1)

8. Jolly Green shall ensure that the outside perimeter of the marijuana establishment is sufficiently lit to facilitate surveillance, where applicable in accordance with 935 CMR 500.110(1).

9. Jolly Green shall develop emergency policies and procedures for securing all product following any instances of diversion, theft or loss of marijuana, and conduct an assessment to determine whether additional safeguards are necessary in accordance with 935 CMR 500.110(1).

10. Jolly Green shall share its security plan with local law enforcement in accordance with 935 500.110(1).

11. Jolly Green shall establish limited access areas with a sign that be a minimum of 12 X 12 and which states Do Not Enter- Limited Access Area-Access Limited To Authorized Personnel Only. The lettering no smaller than one inch in height. In accordance with 935 CMR 500.110(4)

12. Jolly Green shall limit all access areas, and shall be clearly described in a diagram of the licensed premises reflecting entrances and exits, including loading areas, production, storage, disposal areas, propagation, flowering and vegetation areas. In accordance with 935 CMR 500.110(4)

13. Jolly Green shall at all times following receipt of a final License, access to Limited Access Areas shall be restricted to employees, agents, or volunteers specifically permitted by the Marijuana Establishment, agents of the Commission, Commission Delegees, and state and local Law Enforcement Authorities acting within their lawful jurisdictions, police and fire departments, and emergency medical services acting in the course of their official capacity. In accordance with 935 CMR 500.110(4).

14. After a breach if security, Jolly Green shall notify appropriate law enforcement authorities and the Commission no more than 24 hours in accordance with 935 CMR 500.110(7).

15. Jolly Green shall file an incident report following any breach in security within 10 calendar days in accordance with 935 500.110(7).

16. Jolly Green shall maintain incident reports for a period of one year or the duration of an open investigation, whichever is longer in accordance with 935 CMR 500.110(7).

17. Jolly Green will obtain a security system audit on an annual basis. The report must be submitted to the Commission within 30n days of the audit in accordance with 935 CMR 500.110(8).

18. Jolly Green shall have a failure notification system that provides an audible, text or visual notification to designated employees within five (5) minutes of any failure in the security system either by telephone, email, or text message. In accordance with 935 CMR 500.110(5).

19. Jolly Green shall have a hold-up alarm connected to local law enforcement authorities in accordance with 935 500.110(5).

20. Jolly Green shall have all cameras angled to identify any person entering or exiting the establishment in accordance with 935 CMR 500.110(5).

21. Jolly Greens video camera system shall be able to produce a clear, color still photo in

accordance with 935 CMR 500.110(5).

22. Jolly Greens video camera system shall have the date and time stamp embedded in all recordings in accordance with 935 CMR 500.110(5).

23. Jolly Greens video/camera system shall have the ability to remain operational during a power outage in accordance with 935 CMR 500.110(5).

24. Jolly green shall keep all security equipment in good working order and shall be inspected at least every 30 calendar days in accordance with 935 CRM 500.110(5).

25. Jolly Green shall maintain all trees, bushes, and other foliage outside the establishment to prevent persons from concealing themselves from sight in accordance with 935 CMR 500.110(5).

26. Jolly Green shall have an on-site locked safe or vault used exclusively for the purpose of securing cash in accordance with 935 CMR 500.110(7).

27. Cameras shall be directed where cash is kept, handled, and packaged in accordance with 935 CMR 500.110(7).

28. Jolly Green shall have a written process for securing cash and ensuring transfers of deposits to the marijuana establishment's financial institutions and DOR facilities on an incremental basis consistent with the requirements for deposit by the financial institution or DOR facilities in accordance with 935 CMR 500.110(7).

29. Jolly Green shall use of an armored transport provider that is licensed pursuant to M.G.L. c. 147, § 25(watch, guard or patrol agency) and has been approved by the financial institution or DOR facility in accordance with CMR 500.110(7).

30. Jolly Green shall use a locked bag for the transportation of cash from the establishment to a financial institution or DOR facility if approved for an alternative security measure in accordance with 936 CMR 500.110(7).

31. Jolly Green shall transport cash in an unmarked vehicle in accordance with 935 CMR 500.110(7).

32. Jolly Green shall use two registered Marijuana Establishment Agents employed by the Licensee to be present in the vehicle at all times during transportation of deposits in accordance with 935 CMR 500.110(7).

33. Jolly Green shall use real-time GPS tracking of the vehicle at all times when transporting cash in accordance with 935 CMR 500.110(7).

34. Jolly Green shall have access to two-way communications between the transportation vehicle and the Marijuana Establishment in accordance with 935 CMR 500.110(7).

45. Jolly Green shall prohibit the transportation of Marijuana or Marijuana Products at the same time that cash is being transported for deposit to a financial institution or DOR facility in accordance with CMR 935 500.110(7).

46. Jolly Green shall have approval of the alternative safeguard by the financial institution or DOR facility

in accordance with 935 CMR 500.110(7).

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.

Addendum- Inventory Procedures Plan related to the CCC regulations

1. Jolly Green shall keep a real-time inventory and maintain it as specified by the Commission and in 935 CMR 500.105(8)(c) and (d) including, at a minimum, an inventory of Marijuana plants; Marijuana plant-seeds and Clones in any phase of development such as Propagation, Vegetation, and Flowering; Marijuana ready for dispensing; all Marijuana Products; and all damaged, defective, expired, or contaminated Marijuana and Marijuana Products awaiting disposal.
2. Jolly Green shall establish inventory controls and procedures for the conduct of inventory reviews, and comprehensive inventories of Marijuana Products in the process of cultivation, and finished, stored Marijuana in accordance with 935 CMR 500.105(8).
3. Jolly Green shall conduct a monthly inventory of Marijuana in the process of cultivation and finished, stored Marijuana in accordance with 935 CMR 500.105(8).
4. Jolly Green shall conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory in accordance with 935 CMR 500.105(8)
5. Jolly Green shall promptly transcribe inventories if taken by use of an oral recording device. The record of each inventory shall include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory in accordance with 935 CMR 500.105(8).
6. Jolly Green shall attach plant tags to all Marijuana, Clones, and plants and attach package tags to all Finished Marijuana and Marijuana Products, and track all Marijuana seeds, Clones, plants, and Marijuana Products, using a Seed-to-sale methodology in a form and manner to be approved by the Commission in accordance with 935 CMR 500.105(8).

Addendum Transportation Plan CCC regulations

1. Jolly Green shall ensure that all that all transported marijuana is linked to the seed to sale tracking program (Metrc) as in accordance with 935 CMR 500.105(13).
2. Jolly Green shall ensure any marijuana that is undeliverable or refused by the destination establishment shall be transported back to the originating establishment in accordance with 935 CMR 500.105(13).
3. Jolly Green shall ensure within eight hours after arrival, the destination establishment must re-weigh inventory for, on video, all marijuana transported in accordance with 935 CMR 500.105(13).
4. When Jolly Green is transporting marijuana, no other products may be transported or stored in the same vehicle in accordance with 935 CMR 500.105(13).
5. All marijuana being transported must be in a secure locked storage compartment **that is part of the vehicle** and which shall not be easily removed in accordance with 935 CMR 500.105(13).
6. If Jolly Green is transporting marijuana for more than one establishment, the marijuana for beach establishment shall be kept in a separate locked storage compartment and a separate manifest shall be maintained in accordance with 936 CMR 500.105(13).
7. Jolly Green prior to, and immediately after leaving the originating location, the agents shall test communications and GPS operability in accordance with 935 CMR 500.105(13).
8. If communications or the GPS system fails while on route, the agents transporting marijuana must return to the originating location until the system is operational in accordance with 935 CMR 500.105(13).
9. Jolly Greens agents transporting marijuana shall contact the originating location when stopping at and leaving any scheduled location and regularly throughout the trip, at least every 30 minutes in accordance with 935 CMR 500.105(13).
- 10 The originating location must have an agent assigned to monitor the GPS and secure form of communications with the agents in accordance with 935 CMR 500.105(13).
11. A manifest shall be filled out in triplicate, with the original manifest remaining with the originating Marijuana Establishment, a second copy provided to the destination Marijuana Establishment on arrival, and a copy to be kept with the licensed Marijuana Establishment Agent during transportation and returned to the originating Marijuana Establishment in accordance with 935 CMR 500.105(13).
12. Jolly Green on arrival at the destination Marijuana Establishment, a Marijuana Establishment agent at the destination Marijuana Establishment shall compare the manifest produced by the agents who transported the Marijuana Products to the copy transmitted by facsimile or email. This manifest shall, at a minimum, include: _____

- The originating Marijuana Establishment name, address, and registration number;
- The names and registration numbers of the Marijuana Establishment Agents who transported the Marijuana Products;
- The name and registration number of the Marijuana Establishment Agent who prepared the manifest;
- The destination Marijuana Establishment name, address, and registration number;
- A description of the Marijuana Products being transported, including the weight and form or type of product;
- The mileage of the transporting vehicle at departure from originating Marijuana Establishment and mileage on arrival at destination Marijuana Establishment, as well as mileage on return to originating Marijuana Establishment;
- The date and time of departure from originating Marijuana Establishment and arrival at destination Marijuana Establishment for each transportation;
- A signature line for the Marijuana Establishment Agent who receives the Marijuana Products;
- The weight and inventory before departure and on receipt;
- The date and time that the transported products were reweighed and re-inventoried;
- The name of the Marijuana Establishment Agent at the destination Marijuana Establishment who reweighed and re-inventoried products; and
- The vehicle make, model, and license plate number.
- 4. The manifest shall be maintained within the vehicle during the entire transportation process, until the delivery is completed in accordance with 935 CMR 500.105(13).

13. Jolly Green shall retain all transportation manifests for no less than one year and make them available to the Commission on request in accordance with 935 CMR 500.105(13).

Introduction & Hours of Operation

Jolly Green Inc. Hours of operation are Monday through Sunday 6 am to 7 pm. After hours contact information: Kyle Higgins cell 978-502-3740 home

This Security Plan describes the policies, procedures, engineering and physical controls, and other measures that will be implemented to ensure a safe and secure environment for employees, customers, and the community, as well as to comply with local and state security requirements.

A primary goal is to prevent unauthorized entry to the premises, deter theft, burglary and diversion of cannabis products or other valuables, and prevent access to these products by

individuals under 21 years of age. State and local laws supersede any item in the Plan that does not meet regulatory requirements.

Within this plan THC- or CBD-containing material 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

Security Manager

The Security Manager will be responsible for ensuring that this Security Plan is properly implemented.

As relates to the hiring of personnel to staff positions listed in this plan, the CEO or a designee will ensure that the qualifications are met for each employee that requires experience or training above a nominal level, including checking prior employment, degrees or training received, and other references.

Compliance Officer

The Chief Executive Officer (CEO) will designate a Chief Compliance Officer (CCO), who will be responsible for implementing the Plan, or managing a designee who will be responsible for a subset of tasks.

The CCO will ensure that all security procedures are followed related to facility access, emergency response, transportation, training, hiring and supervising security officers, background checks, prohibiting the access of minors to the premises, and other procedures specified in this document.

The CCO is responsible for clearly designating who will serve as a senior security officer in an emergency if both the CEO and CCO are not present.

The CCO will regularly report to the CEO on the status and efficacy of the Security Plan. The CCO will review the Plan annually and recommend changes or amendments to the CEO to improve security features or processes.

The CCO will be the primary contact for all security equipment vendors.

Inventory Control Manager

Under the direction of the CCO, the Inventory Control Manager (ICM) will be responsible for the implementation and operation of the inventory control or track-and-trace system and for ensuring compliance with portions of this Plan related to diversion prevention.

Computing Security Officer

Under the direction of the CCO, the Computing Security Officer (CSO) with appropriate experience and training will manage the security related to data and technology will be responsible for ensuring compliance with the Computing Security portion of this Plan.

Employee Involvement

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

Emergency Procedures

Jolly Green Inc. Hours of operation are Monday through Sunday 6 am to 7 pm. After hours contact information: Kyle Higgins cell 978-502-3740 home 978-868-6523 answering service 877-538-3326

Jolly Green Inc will invite first responders to visit the premises for a walk-through prior to receiving the first shipment of product and request suggestions to the CO to improve the security layout.

During an emergency, if the CCO is on the premises, he/she will serve as the senior security officer and manage activities until the CEO is present. If the CCO is not present, a designated senior security officer will call 911 and interact with Emergency Response personnel. If there is no safety risk to staying on the premises and emergency responders do not direct otherwise, other employees will immediately monitor entrances and exits to prevent unauthorized access, and monitor products that are accessible to customers, contractors, or visitors.

Engineering Controls for Emergency Response

1. A silent alarm for use during an armed robbery.
2. An audible panic alarm to indicate the need for evacuation and a call to 911.
3. A notification system generating a sound, text, or visual signal when the alarm/surveillance system malfunctions.
4. These engineering controls will remain operational during a power outage.

Armed Robbery

Should an armed robbery incident occur, staff will be advised to follow recommendations that are commonly suggested by law enforcement entities, including the following:

During a Robbery:

1. Remain Calm.
2. Obey the robber's commands immediately. Others in the area should freeze in place and do nothing.
3. Don't argue with the robber.
4. Consider all firearms to be loaded.
5. Look at the robbers—notice details to aid you in describing them and their mannerisms. Note age, weight, height, clothing, tattoos or scars and write down the details at the first opportunity.
6. Take note of the weapon.
7. Watch the direction the robbers take—if they use a vehicle, try to note the license plate number.
8. Only press the silent alarm if you can do so without being seen.
9. Don't call the police yet if there is a chance the robber can see or hear you.
10. Don't chase or follow the robber. You could be mistaken for the robber in a pursuit by police.

After a Robbery:

1. Call 911
2. Give the address of the business and state that the location is a cannabis facility, give your name and telephone number, and stay on the phone until the dispatcher ends the call.
3. Give a description of the suspect(s), direction of travel, and a license number if a vehicle was used.
4. Advise whether or not weapons were used.
5. Protect the crime scene. Keep customers or other employees away from the area of the store where the robbery occurred.
6. Ask witnesses to wait until the police arrive.
7. Do not touch anything.
8. Save a note if one was used – do not handle it or let others handle it.
9. Upon arrival of the police, the senior security officer should introduce him/herself, check the responder's ID if there is any reason to be suspicious, and inform them that a higher level manager is on the way (if applicable).

Burglary

If evidence of a burglary is discovered, staff will:

1. Avoid entering areas that have not yet been searched.
2. Notify law enforcement using a non-emergency number.
3. Notify a senior staff member immediately.
4. Prevent others from entering the area or touching anything.
5. Upon arrival of the police, the senior security officer should introduce him/herself, check the responder's ID if there is any reason to be suspicious, and inform them that a higher level manager is on the way (if applicable).

Medical Emergencies

1. In a medical crisis, the CEO is advised to follow procedures learned during CPR/1st Aid training. At least one person with up-to-date training will be on staff at all times.
2. All senior and managing staff will be required to take a CPR/1st Aid course approved by the American Heart Association or the American Red Cross every two years. All employees will be encouraged to take CPR/1st Aid. The company will cover the cost of the course and time taken to complete it.
3. When calling 911, give the address of the business and state that the location is a cannabis facility, give your name and telephone number, and stay on the phone until the dispatcher ends the call.
4. Upon arrival of the emergency responder, the senior security officer should introduce him/herself, and inform them that a higher-level manager is on the way (if applicable).

Fire Emergencies

Before a Fire:

1. Jolly Green Inc will have a designated assembly location at least 150 ft away in case of incidents that require evacuation.
2. The CO will ensure during employee training that all staff know the locations of fire extinguishers and how to use them.
3. Jolly Green Inc will follow recommended procedures to prepare for emergencies that require evacuation, such as keeping doorways, corridors and egress paths clear and unobstructed; making sure that all electrical appliances and cords are in good condition and UL approved; not overloading electrical outlets; and using surge protected multi-outlet power strips and extension cords when necessary. Extension cords without surge protection will be avoided.
4. Fire extinguishers will be mounted and maintained according to regulations.
5. All doors to rooms containing hazardous materials will be clearly marked according to the [NFPA classification system](#). See the Health and Safety Plan for additional information.

During a Fire:

1. Persons aware of the fire will set off the panic alarm and begin evacuation.
2. When evacuating the building, staff are advised to feel doors for heat before opening them to be certain there is no fire danger on the other side.
3. If there is smoke in the air, stay low to the ground, especially your head, to reduce inhalation exposure. Keep one hand on the wall to prevent disorientation and crawl to the nearest exit.
4. Once in a safe location, call 911, give the address of the business and state that the location is a cannabis facility, give your name and telephone number, and stay on the phone until the dispatcher ends the call.
5. If the fire is small, a person on staff who is comfortable with the use of a fire extinguisher may try to put it out.
6. Never fight a fire alone. Never allow the fire to get between you and your exit - always maintain an escape route.
7. Notify emergency responders if someone has not arrived at the evacuation assembly location.

Chemical Spills

1. Employees will receive training on how to read Safety Data Sheets (SDSs), the types and locations of cleanup equipment, and where an employee should be taken for medical attention in a non-emergency situation.
2. Additional copies of SDSs will be filed in a main office in case access to the information is prevented due to a spill.
3. Management will post the phone number for the Poison Control Hotline in all areas where chemicals are used.

Chemical spills are divided into incidental spills and non-incidental spills. An incidental spill does not cause a health or safety hazard to employees or the environment. A non-incidental spill requires a response effort from trained personnel brought in from outside the company. All chemicals that would require this higher level of response will be clearly marked.

In the event of an incidental spill:

1. Verbally notify all within hearing distance that a spill has occurred.
2. If safe to do so, stop further release of the chemical by shutting off valves, providing additional leak containment etc.

3. Refer to the SDS for hazard information.
4. Use the appropriate Personal Protective Equipment (PPE) described in the SDS.
5. Confine a liquid spill with spill pillows or similar devices, then place absorbent over the spilled material.
6. Confine dry spills with a tarp or plastic.
7. Collect the cleaned-up material and the PPE into an appropriate plastic bag.
8. Contact the CO for disposal, which will be conducted according to a Chemical Safety Plan or according directions provided in the SDS.
9. All spills that require the use of cleanup supplies are to be reported to the CO.
10. The CO will ensure that cleanup supplies are reordered if necessary.

If the spill is on the skin or in the eyes:

1. The injured person should ask someone for help.
2. Move the affected person to a safe location.
3. Allow cool running water to gently wash over the skin or eyes for at least 15 minutes.
4. Remove clothing that has been contaminated.
5. The helping employee will consult the SDS to determine if medical attention may be necessary, or in more extreme cases call the Poison Control Hotline at 800-222-1222.
6. If medical attention is required, enlist help from others if necessary to get the employee to a medical facility, or call 911 if the employee is having trouble seeing, is in extreme pain, or has become unconscious.
7. If the employee is taken to a medical facility, take the SDS for the chemical that has been spilled.
8. If emergency response personnel are called in, give the team the SDS for the chemical that has been spilled.
9. Advise a manager as soon as reasonably possible.

In the event of a non-incident spill:

1. Employees will be trained according to the Chemical Safety Plan to identify hazardous chemicals and how to respond to spills according to the severity of the incident.
2. Should employees be in danger due to a spill, they will evacuate the area and close doors to contain the dangerous environment.
3. If safe to do so, shut off sources of ignition to prevent a fire.

4. If there is more than one entrance, post employees at a safe distance to prevent accidental entrance into the room until emergency responders arrive and take over this task.
5. The CO or CEO will be notified immediately.

Workplace Violence Policy

1. Jolly Green Inc is committed to preventing workplace violence and to maintaining a safe work environment. We have adopted the following guidelines to deal with intimidation, harassment or other threats of or actual violence that may occur onsite.
2. All employees, customers, vendors and business associates should be treated with courtesy and respect at all times.
3. Employees are expected to refrain from fighting, "horseplay" or other conduct that may be dangerous to others. Conduct that threatens, intimidates or coerces another employee, customer, vendor or business associate will not be tolerated.
4. Facility resources may not be used to threaten, stalk or harass anyone at or outside the workplace.
5. Indirect or direct threats of violence, incidents of actual violence and suspicious individuals or activities should be reported as soon as possible to a supervisor, senior management, or the CO. When reporting a threat or incident of violence, the employee should be as specific and detailed as possible.
6. Employees should not place themselves in peril, nor should they attempt to intercede during an incident.
7. Employees should promptly inform the CO of any protective or restraining order that they have obtained that lists the workplace as a protected area.
8. Employees are encouraged to report safety concerns with regard to intimate partner violence.
9. Jolly Green Inc will not retaliate against employees making good-faith reports.
10. To maintain workplace safety and the integrity of its investigation, Jolly Green Inc may suspend employees suspected of workplace violence or threats of violence, either with or without pay, pending investigation.
11. Anyone found to be responsible for threats of or actual violence or other conduct that is in violation of these guidelines will be subject to prompt disciplinary action up to and including termination of employment.

Facilities

All doors, gates, safes, vaults, cabinets and other secured locations will be labeled with an individual number or other designation (location code), which will correspond to maintenance and security records and the item's location on a premises map.

Perimeter Security

1. The premises are surrounded by a perimeter fence that is closed and locked during non-business hours.
2. Only management level and other authorized staff will have keys or access codes to open the perimeter fence.
3. A security alarm, including a motion detection system within the perimeter, will notify management of an attempt to breach the perimeter in an unauthorized manner.
4. Lighting will illuminate all areas along the perimeter.
5. A back-up alarm system will be provided by a second security system company, if required.
6. A security company will be contracted to regularly patrol the location when employees are not present.

Premises Ingress and Egress

1. Only management level and other authorized staff will have keys or access codes to open the building and turn off security alarms.
2. The front door to the premises will serve as the only entrance for all staff and visitors.
3. The front door will be staffed at times when visitors are expected.
4. The entrance area will be covered by security cameras facing multiple directions.
5. Back and side doors will be locked such that occupants can leave the building, but not gain access into the building.
6. When a back door is used to bring in supplies, remove waste, or provide access to a service contractor, a company security officer will be present while the door is open.
7. All doors will be alarmed, covered by security cameras, and well lit.
8. At the request of law enforcement or other emergency personnel, doors that are normally kept locked will be unlocked and de-armed for the minimum amount of time required, and a company security officer will monitor the door.
9. Windows will not open, and rooms with windows will be armed with a system that sets off an alarm when the sound of breaking glass is detected.

Product Visibility

1. Windows and glass doors will be covered with a material that prevents those outside the building from seeing products inside.
2. Storage areas and locations where employees are working with the product will not be visible to the public.
3. Only a minimum necessary amount of each product will be on display in areas open to the public.

Building Diagram of Locations Having Alarm Systems, Security Cameras, and Lighting

Lighting Description: Interior/Exterior

Interior:

1. Indoor lighting will be provided by both fluorescent and incandescent overhead bulbs.
2. Lighting inside the building will be sufficient in all areas such that security cameras will be able to record the complete facial features of those in the facility.
3. Burned out bulbs will be replaced within 24 hours and recorded in a facility maintenance log.

Exterior:

1. Outside lights will come on before sunset, and the light will be directed downward by a shade.
2. Lights on the exterior of the building and perimeter fence will use a minimum of a 250 Watts/125 Volt incandescent bulb.
3. Exterior lighting on the building is to be checked every evening, and any burned out bulbs that can be reached with a ladder will be replaced before closing. Lights that require additional equipment to reach the apparatus will be changed as soon as the necessary equipment can be acquired.
4. Any lights that have shifted position and no longer adequately illuminate the expected area will be adjusted within 24 hours if easily accessible or as soon as necessary equipment can be acquired.

Signage

The following signs will be prominently and clearly displayed as designated by state and local regulations:

1. No Trespassing
2. Do Not Enter - Limited Access Area – Access Limited to Licensed Personnel and Escorted Visitors

Backup Power System

A generator will provide enough power to the facility to support critical operations for at least 72 hours.

Critical components include security features, lighting, and environmental controls sufficient to maintain the quality of the product on the premises.

Alarm System

1. The alarm system will meet or exceed the state's requirements.
2. The system will cover the perimeter, the fence around the facility, and both the exterior and interior of the building.
3. All doors that provide access to the building will be alarmed, as well as rooms with exterior windows, skylights or access points on the roof, the main office, and other rooms that contain vaults, safes, or stored product.
4. The alarm system will be installed and monitored during non-business hours by a vetted, licensed alarm company that is capable of meeting all state and local regulations.

Digital Video Surveillance Plan

1. Jolly Green Inc will install a digital video surveillance and recording system that will monitor the following areas:
2. The front and rear of the premises.
3. Parking areas.
4. The exterior within 20 feet of all doors and windows to the outside not adequately covered on the front or rear sides.
5. The entrance area, such that all people who enter the building are clearly recorded.
6. All locations where sales occur.
7. All locations where products are on display or are stored.
8. All locations where individuals interact with the product, including delivery areas.
9. Areas such that individuals who are opening safes or vaults can be clearly viewed.
10. All other rooms that require a higher level of access to enter.

Equipment Standards

1. The equipment will be capable of recording at a high resolution.
2. The cameras will be capable of recording in both high and low light conditions.
3. Cameras in parking areas will be capable of recording license plate numbers.
4. The system will be a type in which live-feed video can be accessed through a secure web site.
5. The equipment will be capable of stamping the video with the accurate date and time.
6. Cameras and other recording equipment will be capable of signaling a failure to an operator within one hour.

Recording Protocol

1. Video of exterior locations will be recorded 24 hours a day at 30 frames per second.
2. Interior locations will be recorded during business hours.
3. The management may record additional interior locations for 24 hours at their discretion.
4. Industry standards will be followed to ensure the integrity and authenticity of video recordings to the level that they could be accepted as evidence in a court of law.
5. Computer access to the recording system will be password protected.
6. Recordings will be backed up before earlier recorded material is overwritten by the system.
7. Backed-up recordings will be stored for 90 days.
8. Each monitored location will have a clearly-visible sign with a statement advising those present they are being recorded.

Recorded Surveillance Storage Protocol

1. Video and storage equipment will be operated and stored in a secured room with limited access.
2. A regularly-updated record will be kept of individuals who have access to the room.
3. Storage files will be password protected.

4. Backup copies of at least the most recent week of surveillance footage will be stored on a secondary secured server on the property or, if on removable media, off-site in a vault or safe where it is easy to access and easily reproducible.
5. Video will be made available immediately upon request to company employees, state and local law enforcement and regulatory authorities, and to other entities as required by law.

Equipment Maintenance

1. The CO or his/her designee will be responsible for creating a security equipment maintenance checklist and activity log and periodically checking that they are being filled out appropriately.
2. Recording equipment will be permanently attached to the property and be checked on a regular basis to check for loose or deteriorating connections, evidence of tampering, etc.
3. Batteries in any equipment will either be replaced, recharged, or checked on a regular basis.
4. Security system software will be updated on a regular basis.
5. Other maintenance operations recommended by the equipment manufacturer will be included in the checklist and conducted on a regular basis.
6. At least one extra camera will be stored in a limited-access location to replace a malfunctioning camera as soon as possible.

Closing Procedure

The CO will produce a Closing Procedure Checklist that will include the following tasks at a minimum.

Ensure that:

1. No one remains in the building.
2. Computers are shut down or have a lock screen on.
3. All doors, gates, safes, vaults and other lockable areas are secure.
4. Surveillance cameras and recording devices are on and operational.
5. Exterior lighting is on.
6. No suspicious vehicles or individuals are in the vicinity.

The Checklist will include a map of all points within the facility that need to be secured.

Product Access

Employee Access Levels

Each employee will be assigned a level of access. The level of access will determine which sections of the facility the employee has permission to enter, access to safes or vaults, and which folders or files can be accessed within the computer system.

1. **Level 1:** Senior staff. Those with this level of access may enter any part of the facility and open all safes or vaults and computer files.
2. **Level 2:** Managers, Security Officers, Facilities Staff. Individuals in this group have access to areas and computer files they are responsible for and may be able to open one or more safes or vaults, depending on position requirements.
3. **Level 3:** Regular staff. General employees have access to a limited number of rooms that contain the materials they work with and only computer files required to accomplish specific tasks.

Employee Identification

All employees or others operating on behalf of the company will display a laminated badge issued by the company at all times on the business premises or while representing the company at off-site locations.

The badge will include:

1. The company name and license number.
2. The employee's first name.
3. The company-assigned employee identification number.
4. A color photo of the employee that is at least 1.5" in height x 1" in width and clearly shows a front view of the employee's face.
5. The employee's access level or a color code that indicates the access level.
6. Optional: a bar code representing the employee's company-assigned identification number for use with the inventory system.

Facility Access Procedures

All doors, gates, safes, vaults, cabinets and other secured locations will be labeled with an individual number or other designation (location code), which will correspond to maintenance and security records and the item's location on a premises map.

Key Issuance Procedure

1. An authorized senior staff member will record the issuance of keys or access cards to a new employee into a security access log (Appendix A).
2. The security access log will include the name of the person being issued the item, the employee's company-assigned identification number, the employee's position/title, the level of access being assigned, date, signature of employee, and the initials of the issuer. If the access permissions are not based on an access level described above, the log will note each location the employee will be able to enter.
3. Extra keys and access cards are to be stored in a vault or safe in the Main Office.
4. All employees issued a key or access card will sign a Key/Key Card User Agreement (Appendix B) attesting to their understanding related procedures.

5. The paper version of the security access log will be stored in a locked location when not in use.

Access Codes

1. For locations controlled by means of entering an access code into a keypad, each individual will have a separate access code, both to track who is accessing the controlled area, and to allow a single code to be terminated rather than rekeying the entire system after the employee's last day.
2. The issuance of an access code will be recorded in the security access log, including a list or designation which indicates the locations the employee is able to access.

Key Return and Access Termination Procedure

1. Upon learning of an employee's final employment date, an authorized senior staff member will notify all staff involved in maintaining the security system, including the computing security officer.
2. A checklist will be generated by the CO with a list of access system items related to the employee that need to be returned or cancelled. As each item is returned or cancelled, the authorized person will check the item off and initial the form.
3. An authorized senior staff member will schedule an exit meeting with the employee, if possible, at the end of the day on the last day of employment.
4. The employee shall return keys or access cards at the exit meeting.
5. The form will be further circulated to those who are responsible for completing the remaining tasks.
6. If an access code has been issued to the employee, it will be removed from the system within 24 hours.
7. If an exit meeting cannot be scheduled with the employee within three days of the employee's last day, the facility's access system will be rekeyed.
8. The security access log and any other related logs will be updated.

Locks/Cabinets/Safes/Vaults

1. All locks on the premises will comply with [ANSI/BHMA standards](#) for Grade 1 products or the equivalent.

2. Locks that show evidence of wear or tampering will be replaced within 48 hours, or if an outside vendor needs to replace the locks, a call will be made to the vendor within 24 hours or the next business day.
3. Extra replacement locks kept on the premises will be stored in a locked cabinet to prevent tampering.
4. Storage cabinets holding product or security-related items will be a minimum of 12-gauge steel, and be secured to a permanent part of the building or to an adjacent cabinet.
5. Any safe on the premises will be of commercial grade, made of metal, and large enough to store all items or products anticipated on the premises in each secured location. The safe will be securely anchored to a permanent part of the building or weigh more than 750 pounds.
6. A vault refers to an enclosed area or room that is constructed of steel-reinforced or block concrete and has a door that contains a multiple-position combination lock or the equivalent, a relocking device or equivalent, and a steel plate with a thickness of at least one-half inch.

Visitor/Contractor Access

1. Any visitor who will have access to employee-only areas will be required to show ID, given a visitor's badge, and escorted by an authorized employee.
2. A Visitor Log (Appendix C) will include the person's name, company, date, time, visitor access card number, and reason for visit.
3. When not in use, the Visitor Log will be kept in a locked location.
4. Visitors will not have access to products or product storage areas unless the person's work must take place in that area.
5. Upon exiting the area, the visitor will turn over the badge to an authorized employee.
6. There are no exceptions to the visitor policy, and the log will be available to law enforcement and regulatory authorities upon request.

Employee-Specific Security Policies

Employee Background Checks

All background checks will be conducted through an FCRA-compliant company and follow [EEOC and FTC guidance](#).

Security Training

1. Training will occur prior to working with any products and be repeated according to state and local regulations.
2. The CO or his/her designee is responsible for keeping a record of training for each training module for every 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.
3. At a minimum, training will occur at a frequency specified by state and local regulations.
4. The CO or his/her designee will set up a calendar or other reminder system to ensure retraining occurs for each employee by each repeating due date.
5. Any documentation related to an individual employee's training will be kept in the employee's file.

Topics included in security training for all employees will include, but not be limited to:

1. Caution in sharing information.
2. Diversion issues and detection.
3. Observing and reporting.
4. Risk management.
5. Robbery response, including practice drills.
6. Conflict resolution.
7. Cybersecurity.
8. Evacuation procedures, including practice drills.
9. State and local legal requirements.
10. Patient privacy (if applicable).

Personnel hired specifically to manage security on the premises will be trained in the use of the Incident Command System (ICS) and the National Incident Management System (NIMS) to increase effectiveness in interactions with emergency response personnel.

Coursework will include at a minimum IS-700 NIMS, an Introduction; ICS-100 Introduction to the Incident Command System; and ICS-200 ICS for Single Resources and Initial Action Incidents.

Security employees may take the courses at work or at home and will be compensated for the number of hours indicated as the course length on the FEMA training website upon providing documentation that each course has been completed.

Diversion Prevention

Jolly Green Inc will implement the following policies to prevent the diversion of product to minors, the unregulated market, or others intending to acquire the product through illegal means.

This Plan will meet or exceed state and local regulations related to diversion prevention. Diversion prevention will be achieved through a combination of security measures, training, and inventory controls.

Signage

Clearly readable signs will be posted in conspicuous locations specifying the state or local regulations with regard to the potential diversion of the product.

Employee Access to Products

Inventory Control Management

1. Jolly Green Inc will use an inventory control or track-and-trace system authorized by the regulating authority, which will serve as the system of record.
2. At a minimum, at least one person, the Inventory Control Manager (ICM), will be fully trained in the use of the system and be the contact with the system vendor.
3. The ICM will ensure that all employees are fully trained in the use of the tracking system, including legal requirements, prior to first access.
4. The ICM will keep a record of all employees with access to the system and ensure the deletion of access credentials of an existing employee immediately upon departure.
5. Any errors found in the system will be corrected within three business days.

6. The ICM will monitor notifications generated by the inventory control system and resolve any issues prior to deleting or marking the notification as resolved.
7. In consultation with the CO and the CEO, the ICM will recommend changes and amendments to the inventory-related portion of this plan on an annual basis.
8. See the Inventory Control Plan for additional details.

Inventory Tracking

1. Every controlled product item will be labeled with an authorized unique identification code to track its movement through the system.
2. Scales used on the premises will be incorporated into the inventory control system to minimize incorrect data entry or diversion.
3. Each storage location will be labeled with a unique identification code to reduce data entry errors during the inventory process.
4. An item-by-item inventory verification will occur at a minimum of once per month.
5. The verification will be conducted by one authorized employee and independently verified by a second authorized employee.
6. If any product is found to be missing, an audit will be conducted by the ICM, and the results reported to the CO.
7. The CEO and CO will maintain a log of lost, stolen, or misappropriated products.
8. If there is a discrepancy of 5 percent or more of the expected inventory, the CEO will notify regulating authorities and/or law enforcement according state and local regulations.
9. If there is evidence of suspected theft or diversion, the CEO will notify the regulating authority and/or law enforcement according state and local regulations.

Transferring Products

Transfers in/out of the Building

1. One access point (doorway or delivery dock) will be used for all delivery activities.
2. A primary security officer will monitor the door and the outside environment during the transfer of any controlled product and observe the transaction.
3. A second security officer or other trained employee designated by the CO will assist the primary security officer.
4. The primary security officer will check the ID of the person(s) delivering or picking up products.
5. Products being delivered or picked up will be listed on a transport manifest and verified via the inventory control system.

6. In addition to the recording of products through the inventory system, the security officer will record the transfer in a log (Appendix D).
7. The log will include the date and time of the transaction, whether the product is incoming or outgoing, the name of the outside company involved in the transaction, the outside employee's name and ID number from his/her badge, the name of the Jolly Green Inc employee involved in the transaction, the initials of the primary security officer, and the initials of an authorized supervisor.
8. The log will be stored in a secured location near the delivery access point when not in use.
9. For the delivery of uncontrolled products, a security officer will be present to monitor the delivery access point, but the delivery will not be logged.

Transfers within the Building

1. The movement of products from one secured location to another or one processing location to another will be recording through the inventory control system and take place along routes that can be monitored via the video surveillance system.
2. A manifest listing each group of products to be transferred will be printed or made electronically accessible and verified by individuals moving or receiving products.

Management of Waste including Expired Products

1. All waste will be collected and disposed of according to state and local regulations.
2. Hazardous waste will be collected and disposed of according to procedures in the Chemical Safety Plan.
3. Waste containing the product will be removed from its packaging and rendered unrecognizable and unusable prior to disposal.
4. Any waste that contains the product will be placed in a secured waste container or locked in a secured location.
5. Each item being disposed of will be tracked through the inventory control system.

Waste Disposal Security

1. If an authorized, outside waste hauler is used to dispose of the product, the following processes will occur:
2. The waste hauler will provide documentation showing the date and time of each waste pickup.

3. Waste will be delivered to a permitted solid waste, composting or other allowed disposal facility with 24-hour monitoring.
4. The waste hauler or receiving facility will forward documentation related to each pickup certifying the weight of the waste delivery.
5. If Jolly Green Inc self-hauls waste to an authorized disposal facility, documentation certifying the weight of the waste delivery will be provided to the hauling employee and turned over to an authorized supervisor upon completion of the delivery.
6. Only employees of the company will be allowed to self-haul waste.

Business Property Records

1. All items purchased for business use costing \$2,000 or more will be labeled with a Property Number.
2. The CO will designate an employee each year to carry out an annual property inventory.
3. If any inventory item is found to be missing, the CO will notify the CEO immediately.
4. The CEO will carry out a brief investigation and report the loss to the authorities and the insurance provider in a timely manner if the item is not recovered.

Computing Security

Jolly Green Inc is committed to ensuring that its computing resources are secured and compliant with legal requirements. Adequate funding will be applied to hiring staff such that the Computing Security Officer (CSO) has the necessary support to implement the Computing Security portion of this plan.

The CSO shall stay up to date on computing security and archiving 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 computing security experts.

Operational and Technical Controls

1. All employees who will have access to the computer system will be required to read and sign a Network and Computing Resources User Agreement (Appendix E).

2. Upon providing an employee with computer access, the event will be recorded in the Security Access Log or a computing-specific access log, including a list or designation which indicates the folders, files, or software systems the employee is able to access.
3. Network and computer passwords must be composed of a combination of upper- and lower-case letters, numbers, and at least one additional character.
4. Employees will be required to create new passwords every 3 months.
5. An exiting employee's computer access will be deleted from the system within 24 hours.
6. User credentials will be encrypted or otherwise secured to protect against password compromises.
7. Permissions for computer folders, files, and online accounts will be limited based on the access needs of the individual.
8. Sensitive business files will be encrypted and otherwise protected whenever there is a need to transfer them electronically outside the internal computer network.
9. Sensitive data stored on removable media, including, but not limited to, laptops, smart phones, flash drives, and CD/DVDs, must be encrypted before the item is taken beyond the physical controls of the premises.
10. Firewalls and intrusion detection systems will be implemented to control access to the network. These configurations will be subject to periodic testing and audits.
11. Access logs will be monitored on a daily basis or a notification system will be used to identify unauthorized attempts to access the computing system and alert the computing security officer and other relevant personnel.
12. The CSO will establish retention periods for logs and review audit logs periodically to ensure that appropriate events are consistently logged and abnormal events are identified and investigated.
13. Only personal information on employees that is required by law will be collected and stored.
14. Information related to credit and debit cards will only be held during the period of time needed to complete the financial transaction and will not be otherwise collected or stored.
15. Sensitive business files will be maintained in a separately secured server location from files used on a daily basis by regular employees.
16. If remote access to the video surveillance system or other files is allowed, the network will have appropriate endpoint security, and the accessible files will be maintained in a separately secured server location from other files.
17. Antivirus and other software will be updated on a regular basis to ensure the integrity of the computing security system.
18. If Jolly Green Inc implements a web application, the CSO will adopt policies recommended by the [Open Web Application Security \(OWASP\) Project](#).

19. The CSO will ensure that recommended guidelines by industry experts are implemented and maintained.

Physical Controls

1. All computers will be screen locked whenever an employee leaves the unit for a period of time that could allow unauthorized access.
2. Primary network and computing hardware will be stored in a secured room with limited access.
3. Any paper logs related to computing resource access will be stored in locked drawers or cabinets.

Electronic File Storage and Archiving

1. Based on state and local requirements, and in consultation with the CEO and the CO, the CSO will identify which datasets will require backup, storage, and archiving and determine a retention schedule.
2. For each type of dataset, the CSO will write a procedure for managing the dataset through its lifecycle.
3. The CSO will develop a protocol to ensure the integrity and authenticity of the stored data to the level that they could be accepted as evidence in a court of law.
4. Backup copies of 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.
5. The CSO will be responsible for ensuring that the procedures are followed according to the retention schedule.

In consultation with the CO and the CEO, the CSO will recommend changes and amendments to the Computing Security portion of this plan on an annual basis.

Appendices

APPENDIX A

Security Access Log

Use as many lines as needed to record information.

Date	Employee Name & ID#	Position/Title	Initials of Issuing Manager	Type of Access & Item ID # if applicable*	Allowed Access**	Initials

* Indicate whether the issued item is a Key, Key Card, or Access Code. If the item has an ID number or related code, indicate here.

** Indicate which doors, safes, vaults, etc. can be opened with the access item. Locations can be grouped and referenced using a code or designation. For example, for an employee who can open all doors and safes, a code of "Level 1" may be recorded here.

APPENDIX B

Key/Key Card User Agreement

Jolly Green Inc Policies Regarding Use of Borrowed Security Items

I, _____ (Print Name) acknowledge my understanding that the key/key card being issued to me is the property of the Jolly Green Inc. On my last day of work, I agree to meet with an authorized representative to return the security access item(s) that has/have been temporarily placed in my custody to access business locations in order to complete the tasks I have been assigned.

I further acknowledge my understanding that I may not let anyone outside the company borrow or otherwise use my access items, nor will I allow unauthorized personnel into an area they have not been given permission to enter.

If I lose my access items or if they are stolen, I will notify a supervisor or manager as soon as possible.

Signature: _____ Date: _____

Items issued:

Type: _____ ID Code: _____

Type: _____ ID Code: _____

APPENDIX C

Visitor Log

Record of visitors allowed to access employee-only areas.
This log is to be stored in a secured location near the main entrance when not in use.

Date & Time	Visitor Name	Company Name (if applicable)	Access Card ID Number	Reason for Visit	Initial here to verify ID check	Approving Manager's Initials

APPENDIX D

Product Delivery Log

Record of incoming and outgoing deliveries of controlled products.
This log is to be stored in a secured location near the delivery access point when not in use.

Date & Time	Name of Company Delivering/Making Pickup	Outside Employee Name & ID#	Jolly Green Inc Employee Name	Security Officer Initials	Supervisor Initials

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APPENDIX E

Network and Computing Resources User Agreement

Jolly Green Inc Policies Regarding Use of Network and Computing Resources

Use of Network and Computing Resources

Jolly Green Inc network and computing resources (hardware and software) are privately owned and are provided to support the work-related activities of Jolly Green Inc.

Users are responsible for all activities initiated from their accounts.

Never share your password, user ID or other personal “log-on” information with anyone. Jolly Green Inc staff will never ask you for your password. Passwords must conform to Jolly Green Inc guidelines and be changed regularly.

Read this statement carefully and initial below to indicate that you understand its implications.

Jolly Green Inc will never send you an email or text asking you to log in through a link to a website or provide your username and password. Clicking on links or otherwise responding to emails asking for this type of information exposes the company to potential security breaches, including the possibility that your email contact list could be used to spread malware. If you receive an email that seems suspicious, forward it to a manager without clicking on any links or responding to it.

Initial here: _____

Users are responsible to stay informed

Jolly Green Inc will keep users informed of system and policy changes through a variety of means including email. It is the users' responsibility to read email messages addressed to them and be aware of the policy information contained therein.

Tampering with installed hardware or software is prohibited

Users shall not tamper with or dismantle installed hardware or software without prior approval from an authorized staff member; this includes operating system software, software used to access the Jolly Green Inc network, software related to data and network security or computer management software.

Unlawful use of software is prohibited

Most software used on Jolly Green Inc computers is covered by copyright, license and/or nondisclosure agreements. Installation of illegal, pirated or unlicensed software on Jolly Green Inc owned machines is prohibited.

User Privacy

Authorized staff are prohibited from arbitrarily accessing a user's computer files or emails. However, in the course of performing their assigned duties, the content of an individual's files or emails may become known to them. If the Jolly Green Inc Manager, or designee, has reasonable suspicion of violations of Jolly Green Inc policies or guidelines, that user's privacy is superseded by the company's requirement to see that policies are properly enforced, and that the data integrity and security of the computer network is maintained for all network users. The examination of files will be limited to the matter under consideration. If, for this reason, authorized staff are instructed to access the contents of a computer assigned to a user, Jolly Green Inc must notify the user 48 hours prior to, or within 48 hours after accessing the user's computer.

In the event of criminal or legal investigations, Jolly Green Inc may also be required to provide copies of email messages to the appropriate authorities.

Unauthorized Use of Computing Resources

Jolly Green Inc employees, agents, or representatives must not use any computing resource in a prohibited manner. Prohibited activities include but are not limited to: obtaining or attempting to obtain unauthorized access to information or system resources; putting viruses, worms or any other type of disruptive software into a computer system or network; maliciously causing computer system slowdowns or rendering systems inoperable; surfing or downloading sexually explicit materials from “adult” websites; sending or printing patently offensive email, documents, or images; using computers or networks in a fashion that causes harassment, abuse, or intimidation of another person.

Enforcement

Repeated minor infractions or serious misconduct may result in the loss of computer access privileges or the modification of those privileges to prevent the party or parties from further violations. Depending upon the severity of the infraction and its actual or potential effects upon Jolly Green Inc, additional disciplinary actions may be taken including termination.

Any offense which violates local, state, or federal laws may result in the immediate loss of all computing privileges and may be referred to appropriate law enforcement authorities.

By signing below, I certify that on this date I have read and understand the above information regarding my responsibilities for the use of Jolly Green Inc network and computing resources.

Printed Name: _____ Signature: _____

Date: _____

A copy of this signed form is to be filed with the employee's permanent records.

APPENDIX F

SALES INVOICE/ SHIPPING MANIFEST

PLEASE USE PERMANENT INK FOR ALL ITEMS

INVOICE/MANIFEST NUMBER:				ACTUAL DATE AND TIME OF DEPARTURE:	/ /	AM PM
ATTACHED PAGE(S)?	YES <input type="checkbox"/> NO <input type="checkbox"/>	# OF ATTACHED PAGES:		ESTIMATED DATE AND TIME OF ARRIVAL:	/ /	AM PM

SHIPPER INFORMATION	
STATE LICENSE #	
TYPE OF LICENSE	
BUSINESS NAME	
BUSINESS ADDRESS	
CITY, STATE, ZIP CODE	
PHONE NUMBER	
CONTACT NAME	

RECEIVER INFORMATION	
STATE LICENSE #	
TYPE OF LICENSE	
BUSINESS NAME	
DELIVERY ADDRESS	
CITY, STATE, ZIP CODE	
PHONE NUMBER	
CONTACT NAME	

DISTRIBUTOR INFORMATION			
STATE LICENSE #		DRIVER'S NAME	
BUSINESS NAME		CA DRIVER'S LICENSE#	
STREET ADDRESS		VEHICLE MAKE	
CITY, STATE, ZIP		VEHICLE MODEL	
PHONE NUMBER		VEHICLE LIC. PLATE #	
CONTACT NAME		ACTUAL DATE AND TIME OF ARRIVAL:	/ / AM PM

PRODUCT SHIPPED DETAILS							
SHIPPER COMPLETES ALL THE UNSHADED COLUMNS BELOW. RECEIVER COMPLETES <u>ONLY</u> THE SHADED COLUMNS BELOW (Please attach additional pages, if needed)							
UID TAG NUMBER (IF APPLICABLE)	ITEM NAME AND PRODUCT DESCRIPTION (INCLUDE WEIGHT OR COUNT)	QTY ORDERED	QTY REC'D	UNIT COST	TOTAL COST	RETAIL ONLY	
						UNIT RETAIL VALUE	TOTAL RETAIL VALUE

PRODUCT REJECTION	
IF PRODUCTS ARE REJECTED, PLEASE CIRCLE THE ITEMS BEING REJECTED IN THE PRODUCT SHIPPED DETAILS SECTION ABOVE	
REASON FOR REJECTION:	

PRODUCT RECEIPT CONFIRMATION			
I CONFIRM THAT THE CONTENTS OF THIS SHIPMENT MATCH IN WEIGHT AND COUNT AS INDICATED ABOVE. I AGREE TO TAKE CUSTODY OF ALL ITEMS AS INDICATED RECEIVED ABOVE – AND WHICH ARE NOT CIRCLED. THE PRODUCTS CIRCLED ABOVE ARE REJECTED FOR DELIVERY AND REMAIN IN THE CUSTODY OF THE DISTRIBUTOR FOR RETURN TO THE SHIPPER AS INDICATED ON THIS FORM AND ALL ATTACHED PRODUCT DETAILS SHEET(S).			
NAME OF PERSON RECEIVING AND/OR REJECTING PRODUCT:		PHONE NUMBER:	
SIGNATURE OF PERSON RECEIVING AND/OR REJECTING PRODUCT:		DATE SIGNED:	

SALES INVOICE / SHIPPING MANIFEST
PRODUCT DETAILS ATTACHMENT PAGE

PLEASE USE PERMANENT INK FOR ALL ITEMS

INVOICE/MANIFEST NUMBER ATTACHED TO:		ATTACHED PAGE		OF		TOTAL PAGES
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PRODUCT SHIPPED DETAILS

SHIPPER COMPLETES ALL THE UNSHADED COLUMNS BELOW. RECEIVER COMPLETES ONLY THE SHADED COLUMNS BELOW
(Please attach additional pages, if needed)

[illegible]

PRODUCT REJECTION

IF A PRODUCT(S) ARE REJECTED, PLEASE CIRCLE THE ITEMS BEING REJECTED IN THE PRODUCT SHIPPED DETAILS SECTION ABOVE

REASON FOR REJECTION:

PRODUCT RECEIPT CONFIRMATION

I CONFIRM THAT THE CONTENTS OF THIS SHIPMENT MATCH IN WEIGHT AND COUNT AS INDICATED ABOVE.
I AGREE TO TAKE CUSTODY OF ALL ITEMS AS INDICATED RECEIVED ABOVE – AND WHICH ARE NOT CIRCLED.
THE PRODUCTS CIRCLED ABOVE ARE REJECTED FOR DELIVERY AND REMAIN IN THE CUSTODY OF THE DISTRIBUTOR FOR RETURN TO THE
SHIPPER AS INDICATED ON THIS FORM.

THIS PRODUCT DETAILS ATTACHMENT PAGE IS ATTACHED TO INVOICE #

NAME OF PERSON RECEIVING AND/OR REJECTING PRODUCT:		PHONE NUMBER:	
SIGNATURE OF PERSON RECEIVING AND/OR REJECTING PRODUCT:		DATE SIGNED:	

Energy Compliance Plan Cannabis Product Manufacturing

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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. Cannabis product manufacturing 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, Cannabis product manufacturing

It is the responsibility of 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. Kyle Higgins will update this Plan, as needed, to comply with evolving laws and regulations.

Minimizing Carbon Footprint

Cannabis product manufacturing, 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 general building lighting

- 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. 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 Cannabis product manufacturing 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 Cannabis product manufacturing 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.

Odor Control

Although Cannabis product manufacturing odor from harvested plants is not considered and 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.

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, 208v 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 11pm and 4pm. During this time span of lower electrical costs, all reasonable Cannabis product manufacturing 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

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. 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 cannabis product manufacturing requirements. Adjustments aiming towards minimizing energy usage will regularly be made, based on this gathered information.

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 Cannabis product manufacturing. 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. 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.

Water Usage

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 its legacy equivalent. Lower wattage equates directly to lower heat production, meaning that the air conditioning requirement for Cannabis product manufacturing 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 product manufacturing, 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 people 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 Carrier chilled water system, designed specifically for cannabis product manufacturing 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.

LED lights offer 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 product manufacturing facilities.

Regular Servicing and Sanitation

All climate control and lighting equipment will be tested, serviced and cleaned on a monthly basis, including filter changes. Dirty, un-serviced 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

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 product. 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