



Massachusetts Cannabis Control Commission

Marijuana Product Manufacturer

General Information:

License Number: MP281540
Original Issued Date: 02/20/2020
Issued Date: 03/11/2021
Expiration Date: 03/13/2022

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Platinum HydroLab, Inc

Phone Number: 978-853-2779
Email Address: platinumhydrolab@gmail.com

Business Address 1: 740 Dutton St
Business City: Lowell
Business State: MA
Business Zip Code: 01854
Mailing Address 1: 13 Jacques Rd
Mailing City: Tyngsboro
Mailing State: MA
Mailing Zip Code: 01879

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: 50
Role: Owner / Partner
Percentage Of Control: 50
Other Role:

First Name: Brian	Last Name: Lynch	Suffix:
Gender: Male	User Defined Gender:	
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)		
Specify Race or Ethnicity:		

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 50	Percentage Of Control: 50	
Role: Owner / Partner	Other Role:	
First Name: Elizabeth	Last Name: Skinsacos	Suffix:
Gender: Female	User Defined Gender:	
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)		
Specify Race or Ethnicity:		

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: Elizabeth	Last Name: Skinsacos	Suffix:	
Types of Capital: Monetary/ Equity	Other Type of Capital:	Total Value of the Capital Provided: \$500000	Percentage of Initial Capital: 100
Capital Attestation: Yes			

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Brian	Last Name: Lynch	Suffix:
Marijuana Establishment Name: Platinum HydroLab, Inc.	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Lowell	Marijuana Establishment State: MA	

Individual 2

First Name: Elizabeth	Last Name: Skinsacos	Suffix:
Marijuana Establishment Name: Platinum HydroLab, Inc.	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Lowell	Marijuana Establishment State: MA	

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 740 Dutton Street	
Establishment Address 2:	
Establishment City: Lowell	Establishment Zip Code: 01854
Approximate square footage of the Establishment: 7000	How many abutters does this property have?: 42

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
Certification of Host Community Agreement	HCA Attestation Form_Executed.pdf	pdf	5bf57d08730d5d0462f12811	11/21/2018
Plan to Remain Compliant with Local Zoning	Platinum Hydrolab, Inc. - Plan to Remain Compliant with Local Zoning.pdf	pdf	5bf57d166906170d879394cb	11/21/2018
Community Outreach Meeting Documentation	Community Outreach Meeting Documentation.pdf	pdf	5bf5d0c3e18b8a04881de03f	11/21/2018

Total amount of financial benefits accruing to the municipality as a result of the host community agreement. If the total amount is zero, please enter zero and provide documentation explaining this number.: \$-1

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Platinum Hydrolab_Plan for Positive Impact (2).pdf	pdf	5d791b2cd8b08e1dbf1453d4	09/11/2019

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Other Role:
First Name: Brian Last Name: Lynch Suffix:
RMD Association: Not associated with an RMD
Background Question: yes

Individual Background Information 2

Role: Other Role:
First Name: Elizabeth Last Name: Skinsacos 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
Department of Revenue - Certificate of Good standing	Certificate of Good Standing from DOR.pdf	pdf	5c0055d14287b10d4f3706ad	11/29/2018
Secretary of Commonwealth - Certificate	PHy - Certificate of Good Standing -	pdf	5c00565125766f0d55cc444a	11/29/2018

of Good Standing	v.7.16.18.pdf			
Articles of Organization	PHy - Articles of Organization - v.6.12.18.pdf	pdf	5c005656fe03b20d5f6961ba	11/29/2018
Bylaws	BY-LAWS.pdf	pdf	5c005758813a010d917adeab	11/29/2018

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	Certificate of Good Standing_SoC.pdf	pdf	5fe3af4279776c07d15e6112	12/23/2020
Department of Unemployment Assistance - Certificate of Good standing	Certificate of Good Standing DUA_Attestation.pdf	pdf	5fe3af5309cfae0810fd1b55	12/23/2020
Department of Revenue - Certificate of Good standing	Certificate of Good Standing_DOR.pdf	pdf	601c137a1c95e43696cccd49	02/04/2021

Massachusetts Business Identification Number: 001331996

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Proposed Timeline	Platinum_Proposed Timeline.pdf	pdf	5fe4f74a36d86207eb967cbc	12/24/2020
Business Plan	Platinum Hydrolabs Business Plan.pdf	pdf	5feb41e52027b107e8dc7d87	12/29/2020
Plan for Liability Insurance	Platinum_Plan for Obtaining Liability Insurance.pdf	pdf	5febb7b4e767d307ceee3500	12/29/2020

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Diversity plan	Platinum Hydrolab_Diversity Plan - final.pdf	pdf	5dc4388bea4df3530e643150	11/07/2019
Restricting Access to age 21 and older	Platinum_Plan for Restricting Access to 21.pdf	pdf	5fcfb072f867b207bbf10685	12/08/2020
Security plan	Platinum_Security Plan.pdf	pdf	5fcfb07963caf5075a67e0f4	12/08/2020
Prevention of diversion	Platinum_Prevention of Diversion.pdf	pdf	5fcfb07fc3fca007695a94cb	12/08/2020
Storage of marijuana	Platinum_Storage Policy.pdf	pdf	5fcfb085925f52079a1f31cf	12/08/2020
Transportation of marijuana	Platinum_Transportation of Marijuana.pdf	pdf	5fcfb09215105a077971280d	12/08/2020
Inventory procedures	Platinum HydroLab_Inventory Procedures.pdf	pdf	5fcfb0a0418c5607a11da17d	12/08/2020
Quality control and testing	Platinum_Quality Control and Testing_PM.pdf	pdf	5fcfb0a6728b9907c6dd7954	12/08/2020
Personnel policies including background checks	Platinum_Personnel Policies Including Background Checks.pdf	pdf	5fcfb0ac91587f078718f43c	12/08/2020
Record Keeping procedures	Platinum_Recordkeeping Procedures.pdf	pdf	5fcfb0b1c3fca007695a94cf	12/08/2020
Maintaining of financial records	Platinum HydroLab_Maintaing Financial	pdf	5fcfb0b6fda1250795584788	12/08/2020

Records.pdf				
Qualifications and training	Platinum HydroLab_Qualifications and Training.pdf	pdf	5fcfb0c5925f52079a1f31d3	12/08/2020
Energy Compliance Plan	Platinum_Energy Compliance Plan_PM.pdf	pdf	5fe3af2a982b2307e19927ed	12/23/2020
Safety Plan for Manufacturing	Platinum_Product Manufacturing Safety Plan.pdf	pdf	5febb8f489d382080d8ecd88	12/29/2020
Plan to Obtain Marijuana	Platinum_Plan for Obtaining Marijuana or Marijuana Products.pdf	pdf	5febba5589d382080d8ecd8c	12/29/2020
Types of products Manufactured.	Platinum_Types of Products Manufactured.pdf	pdf	5ff3732209cfae0810fd313b	01/04/2021

ATTESTATIONS

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

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

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

Notification: I Understand

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

COMPLIANCE WITH POSITIVE IMPACT PLAN

Progress or Success Goal 1

Description of Progress or Success: Platinum HydroLab will be conducting quarterly, industry-specific educational seminars for residents of Lowell. Once it is safe to do so, Platinum plans to roll out the educational programs. Please see the draft flyer attached that will be posted.

Progress or Success Goal 2

Description of Progress or Success: Once we begin to hire, Platinum HydroLab will work directly with staffing agencies to identify qualified candidates for open job positions who are Massachusetts residents that have past drug convictions (but who are otherwise permitted to be employed in the Massachusetts marijuana industry) with the goal of maintaining a staff comprised of at least 25% of such individuals.

Progress or Success Goal 3

Description of Progress or Success: Platinum HydroLab will require all staff to participate in quarterly community clean-up days in Designated Lowell Census Tracts. Platinum HydroLab will identify 2021 Lowell cleanup events through the "Lowell Parks & Conservation Trust" as well as "Keep Massachusetts Beautiful."

COMPLIANCE WITH DIVERSITY PLAN

Date generated: 02/01/2022

Page: 5 of 6

Diversity Progress or Success 1

Description of Progress or Success: Platinum Hydrolab plans to participate in at least two (2) career fairs per year in underrepresented and minority communities once the state of emergency order has been lifted. Please see the attached Career Fair flyer that we plan to use once we can participate.

Diversity Progress or Success 2

Description of Progress or Success: Platinum HydroLab currently is not operating and therefore; is not hiring. However, Platinum HydroLab plans to work directly with staffing agencies to identify qualified candidates for an open job positions with the goal of maintaining a staff comprised of at least 50% of minorities, women, veterans, people with disabilities or people who identify as LGBTQ+. Please find attached a copy of a Director of Cultivation job posting that will be posted once we begin to hire.

Diversity Progress or Success 3

Description of Progress or Success: Platinum HydroLab currently is not operating and therefore; is not hiring. However, Platinum HydroLab plans to work directly with staffing agencies to identify qualified candidates for an open job position. Please find attached a copy of a Director of Cultivation job posting that will be posted once we begin to hire.

PRODUCT MANUFACTURER SPECIFIC REQUIREMENTS

Item 1

Label Picture:

Document Category	Document Name	Type	ID	Upload Date
	Not Applicable At This Time.pdf	pdf	5fbbde1bdd2d7407bedeea13	11/23/2020

Name of Item: N/A

Item Type: Flower

Item Description: As Platinum HydroLab is not yet operational at this time, it does not have any items that it is currently producing.

HOURS OF OPERATION

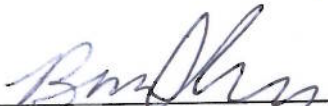
Monday From: 7:00 AM	Monday To: 7:00 PM
Tuesday From: 7:00 AM	Tuesday To: 7:00 PM
Wednesday From: 7:00 AM	Wednesday To: 7:00 PM
Thursday From: 7:00 AM	Thursday To: 7:00 PM
Friday From: 7:00 AM	Friday To: 7:00 PM
Saturday From: 7:00 AM	Saturday To: 7:00 PM
Sunday From: 7:00 AM	Sunday To: 7:00 PM

Host Community Agreement Certification Form

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

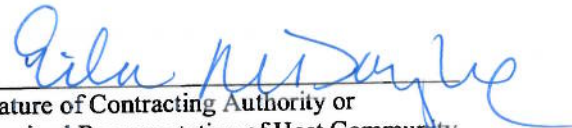
Applicant

I, Brian Lynch, (*insert name*) certify as an authorized representative of Platinum Hydrolab, Inc (*insert name of applicant*) that the applicant has executed a host community agreement with City of Lowell (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on 4/21/2018 (*insert date*).


Signature of Authorized Representative of Applicant

Host Community

I, Eileen Donoghue, (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for City of Lowell (*insert name of host community*) to certify that the applicant and City of Lowell (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on 11/21/2018 (*insert date*).


Signature of Contracting Authority or
Authorized Representative of Host Community

PLAN TO REMAIN COMPLIANT WITH LOCAL ZONING

Platinum Hydrolab, Inc. (“PHy”) will remain compliant at all times with the local zoning requirements set forth in the City of Lowell Zoning Code. In accordance with Zoning Code Section 7.10 and Article XII (12.9.s Cultivation), PHy’s proposed Marijuana Cultivator facility is located in the Light Industry, Manufacturing and Storage Zoning District designated for Marijuana Cultivator facilities. Per the Lowell Zoning Code, PHy may site its Marijuana Cultivator facility in the Light Industry, Manufacturing and Storage Zoning District by right.

PHy will be located, constructed and operated in such a way as to minimize, to the extent feasible, any noise, safety, odor and environmental impacts. PHy will conform to the dimensional requirements set forth in the Lowell Zoning Code. The PHy facility will be located in a permanent building and will not be a mobile facility.

In compliance with 935 CMR 500.110(3), the property is not located within 500 feet of an existing public or private school providing education to children in kindergarten or grades 1 through 12.

PHy will apply for any other local permits required to operate a Marijuana Cultivator facility at the proposed location. PHy will comply with all conditions and standards set forth in any local permit required to operate a Marijuana Cultivator facility at PHy’s proposed location. Pursuant to Section 7.10.5 of the Lowell Zoning Code, in the manner and form prescribed by the same, PHy will provide the Planning Board with: (1) a narrative providing information about the type and scale of all activities that will take place on the propose site; (2) a context map depicting all properties and land uses within a one thousand foot (1,000’) radius (minimum) of the project site; (3) a Transportation Demand Management Plan to establish the impacts of the peak traffic demand and model the expected origin and frequency of employee and client trips to the site; (4) a security plan for facility operations and transportation that has been reviewed and approved by the Lowell Police Department; (5) a designated, single on-site staff member to serve as the community liaison with direct interaction with on-site security and City police; and (5) a secure solid waste disposal and recycling plan to be approved by the Solid Waste and Recycling Department, Lowell Fire Department and Lowell Police Department.

PHy has already attended several meetings with various municipal officials and boards to discuss PHy’s plans for a proposed Marijuana Cultivator facility and has executed a Host Community Agreement with the City of Lowell. PHy will continue to work cooperatively with various municipal departments, boards, and officials to ensure that PHy’s Marijuana Cultivator facility remains compliant with all local laws, regulations, rules and codes with respect to design, construction, operation, and security.

PHy has also retained the law firm Vicente Sederberg LLC to assist with ongoing compliance with local zoning requirements.

Community Outreach Meeting Attestation Form

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

I, Brian Lynch, (*insert name*) attest as an authorized representative of Platinum Hydrolab, Inc. (*insert name of applicant*) that the applicant has complied with the requirements of 935 CMR 500 and the guidance for licensed applicants on community outreach, as detailed below.

1. The Community Outreach Meeting was held on May 21, 2018 (*insert date*).
2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on May 11, 2018 (*insert date*), which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A (*please clearly label the newspaper notice in the upper right hand corner as Attachment A and upload it as part of this document*).
3. A copy of the meeting notice was also filed on May 15, 2018 (*insert date*) with the city or town clerk, the planning board, the contracting authority for the municipality, and local licensing authority for the adult use of marijuana, if applicable. A copy of the municipal notice is attached as Attachment B (*please clearly label the municipal notice in the upper right-hand corner as Attachment B and upload it as part of this document*).
4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on May 8, 2018 (*insert date*), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (*please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee*).

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

*city
managed*

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for **Monday, May 21, 2018 at 6PM** at Cobblestones of Lowell - Function Room - 91 Dutton St, Lowell, MA 01852. The proposed **Wholesale Cultivation and Processing only service will not provide retail sales in the community.** The facility is anticipated to be located at 740 Dutton St, Lowell MA 01852. There will be an opportunity for the public to ask questions.

RECEIVED
DIVISION OF
DEVELOPMENT SERVICES
MAY 15 PM 4:51

Lowell planning
~~center~~
and Development



Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for **Monday, May 21, 2018 at 6PM** at Cobblestones of Lowell - Function Room - 91 Dutton St, Lowell, MA 01852. The proposed **Wholesale Cultivation and Processing only service will not provide retail sales in the community.** The facility is anticipated to be located at 740 Dutton St, Lowell MA 01852. There will be an opportunity for the public to ask questions.

~~Planning~~
City Clerk



Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for **Monday, May 21, 2018 at 6PM** at Cobblestones of Lowell - Function Room - 91 Dutton St, Lowell, MA 01852. The proposed **Wholesale Cultivation and Processing only service will not provide retail sales in the community.** The facility is anticipated to be located at 740 Dutton St, Lowell MA 01852. There will be an opportunity for the public to ask questions.

2018 MAY 15 PM 5:07

RECEIVED
CITY OF LOWELL
CITY CLERKS OFFICE

[REDACTED]
[REDACTED]
LOWELL, MA 01854rec. 5/11/18
Cammie
Helms

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for **Monday, May 21, 2018 at 6PM** at Cobblestones of Lowell - Function Room - 91 Dutton St, Lowell, MA 01852. The proposed **Wholesale Cultivation and Processing only service will not provide retail sales in the community.** The facility is anticipated to be located at 740 Dutton St, Lowell MA 01852. There will be an opportunity for the public to ask questions.

PLATINUM HYDROLAB, INC.
MUNICIPAL RESPONSE ATTESTATION – LOWELL

On behalf of Platinum HydroLab, Inc. (“Platinum HydroLab”), I, Brian Lynch, do hereby certify the following:

- In accordance with the requirements of Platinum HydroLab’s license renewals for its adult-use licenses (MC281510 and MP281540), Platinum HydroLab requested from the City of Lowell (the “Host Community”) the records of any cost to the Host Community, whether anticipated or actual, resulting from Platinum HydroLab’s operation within its borders (the “Request”).
- Platinum HydroLab submitted the Request to the Host Community on 12/15/20.
- As of the date of this attestation, the Host Community has not provided Platinum HydroLab with any records of costs to the Host Community, whether anticipated or actual, resulting from Platinum HydroLab’s operation within its borders.

Brian C Lynch

12/18/20

Name: Brian Lynch

Date

Title: Chief Executive Officer

Entity: Platinum HydroLab, Inc.

November 28, 2020

Mayor John Leahy
Lowell City Hall
375 Merrimack Street
Lowell, MA 01852

Re: Request for Records of Costs Related to Platinum HydroLab, Inc.'s Lowell Operations

Dear Mayor Leahy:

Please be advised that, as a requirement of Platinum HydroLab, Inc.'s ("Platinum HydroLab") license renewal approval for its marijuana establishment licenses in the City of Lowell ("Lowell" or the "City"), the Cannabis Control Commission (the "Commission") requires Platinum HydroLab to submit as part of its license renewal applications (1) documentation that it requested from the City the records of any cost to the City, whether anticipated or actual, resulting from the licensee's operation within its borders, and (2) any response received from the City in connection with such request, and if no response is received, an attestation to that effect.

Accordingly, please accept this correspondence as Platinum HydroLab's formal request to the City to produce the records of any cost, whether anticipated or actual, resulting from Platinum HydroLab's operation within the City. Please note that a copy of this correspondence along with any response received from the City, or barring receipt of any response, an attestation to that effect, shall be submitted by Platinum HydroLab to the Commission. As the City is aware, in accordance with M.G.L. c. 94G, § 3(d), any cost to the City imposed by the operation of a Marijuana Establishment shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

Platinum HydroLab respectfully requests that the City respond to this request as soon as possible so that Platinum HydroLab can timely comply with the requirements of its license renewals.

If we can provide additional information, please do not hesitate to ask.

Sincerely,

Brian C Lynch

Brian Lynch
CEO/Director of Cultivation

PLAN TO POSITIVELY IMPACT AREAS OF DISPROPORTIONATE IMPACT

Overview

Platinum Hydrolab, Inc. (“PHy”) is dedicated to serving and supporting populations falling within areas of disproportionate impact, which the Commission has identified as the following:

1. Past or present residents of the geographic “areas of disproportionate impact,” which have been defined by the Commission and identified in its Guidance for Identifying Areas of Disproportionate Impact;
2. Commission-designated Economic Empowerment Priority applicants;
3. Commission-designated Social Equity Program participants;
4. Massachusetts residents who have past drug convictions; and
5. Massachusetts residents with parents or spouses who have drug convictions are classified as areas of disproportionate impact.

To support such populations, PHy has created the following Plan to Positively Impact Areas of Disproportionate Impact (the “Plan”) and has identified and created goals/programs to positively impact residents from Designated Lowell Census Tracts and Massachusetts residents who have past drug convictions (but who are otherwise eligible to be employed in the Massachusetts marijuana industry).

Goals

In order for PHy to positively impact residents from Designated Lowell Census Tracts and Massachusetts residents who have past drug convictions, PHy has established the following goals:

1. Reducing barriers to entry in the commercial adult-use cannabis industry;
2. Providing mentoring, professional, and technical services for individuals and businesses facing systemic barriers; and
3. Providing business assets towards endeavors in Designated Lowell Census Tracts that will have a positive impact on the members of that community or the community as a whole.

Programs

PHy has developed specific programs to effectuate its stated goals to positively impact residents from Designated Lowell Census Tracts and Massachusetts residents who have past drug convictions. Such programs will include the following:

1. Conducting quarterly, industry-specific educational seminars for residents of Designated Lowell Census Tracts:
 - a. Topics for the educational seminars will include marijuana cultivation, marijuana product manufacturing, and marijuana business training;

- b. Educational seminars will be able to accommodate between ten and twenty invitees from the Designated Lowell Census Tracts; and
 - c. Invitees who participate in the educational seminars will be required to complete an attestation that they are a past or present resident of the Designated Lowell Census Tracts.
2. Working directly with staffing agencies to identify qualified candidates for open job positions who are Massachusetts residents that have past drug convictions (but who are otherwise permitted to be employed in the Massachusetts marijuana industry) with the goal of maintaining a staff comprised of at least 25% of such individuals.
3. Requiring all staff to participate in a quarterly community clean-up days in Designated Lowell Census Tracts. Quarterly community clean-up days will range from two (2) hours to eight (8) hours of service per employee.

Measurements

The General Manager will administer the Plan and will be responsible for developing measurable outcomes to ensure PHy continues to meet its commitments. Such measurable outcomes, in accordance with PHy's goals and programs described above, include:

- Documenting the quarterly educational seminars, including the individuals who participated and a description of the topics covered;
- Ensuring that at least 25% of staff are comprised of Massachusetts residents that have past drug convictions (but who are otherwise permitted to be employed in the Massachusetts marijuana industry) through a quarterly staffing analysis, as well as documentation of all such applicants received and identified through staffing agencies; and
- Documenting quarterly community clean-up days, including staff participation, a description of the efforts undertaken, and the Designated Lowell Census Tract that each day specifically impacted.

Beginning upon receipt of PHy's first Provisional License from the Commission to operate a marijuana establishment in the Commonwealth, PHy will utilize the proposed measurements to assess its Plan and will account for demonstrating proof of success or progress of the Plan upon the yearly renewal of the license.

In order to ensure that PHy is both meeting its community impact goals and ascertaining that the goals are having the desired impact, the company will take the following measurement and accountability steps:

- Management will meet at least twice annually to assess community impact hiring goals:
 - The assessment will also include a remediation plan to meet the goals if the company is not on track to meet them by the specified time period; or
 - If the company has met the goal early, determine if the goals need to be increased.

- PHy will survey employees twice annually to ensure that community impact goals are being met and identify potential issues or areas of concern.

Acknowledgements

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



Commonwealth of Massachusetts
Department of Revenue
Christopher C. Harding, Commissioner

mass.gov/dor

Letter ID: L1179204224
Notice Date: October 29, 2018
Case ID: 0-000-294-403



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



BRIAN LYNCH
PLATINUM HYDROLAB
740 DUTTON ST
LOWELL MA 01854-4310

Why did I receive this notice?

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

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

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

What if I have questions?

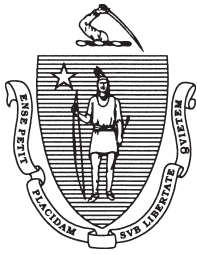
If you have questions, call us at (617) 887-6367 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 8:30 a.m. to 4:30 p.m..

Visit us online!

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

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

Edward W. Coyle, Jr., Chief
Collections Bureau



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

William Francis Galvin
Secretary of the
Commonwealth

Date: July 16, 2018

To Whom It May Concern :

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

PLATINUM HYDROLAB, INC.

is a domestic corporation organized on **June 12, 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: 18070265690

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

Processed by:



The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$250.00

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

Articles of Organization

(General Laws, Chapter 156D, Section 2.02; 950 CMR 113.16)

Identification Number: 001331996

ARTICLE I

The exact name of the corporation is:

PLATINUM HYDROLAB, INC.

ARTICLE II

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

ARTICLE III

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

Class of Stock	Par Value Per Share Enter 0 if no Par	Total Authorized by Articles of Organization or Amendments		Total Issued and Outstanding Num of Shares
		<i>Num of Shares</i>	<i>Total Par Value</i>	
CNP	\$0.00000	1,000	\$0.00	500

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

ARTICLE IV

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

ARTICLE V

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

ANY STOCKHOLDER, INCLUDING THE HEIRS, ASSIGNS, EXECUTORS OR ADMINISTRATOR OF A DECEASED STOCKHOLDER, DESIRING TO SELL OR TRANSFER SUCH STOCK OWNED BY HIM OR THEM, SHALL FIRST OFFER IT TO THE CORPORATION THROUGH THE BOARD OF DIRECTORS, IN THE FOLLOWING MANNER: HE SHALL NOTICE THE DIRECTORS OF HIS DESIRE TO SELL OR TRANSFER BY NOTICE IN WRITING, WHICH NOTICE SHALL CONTAIN THE P

RICE AT WHICH HE IS WILLING TO SELL OR TRANSFER AND THE NAME OF ONE ARBITRATOR. THE DIRECTORS SHALL WITHIN THIRTY (30) DAYS THEREAFTER EITHER ACCEPT THE OFFER, OR BY NOTICE TO HIM IN WRITING NAME A SECOND ARBITRATOR AND THESE TWO SHALL NAME A THIRD. IT SHALL THEN BE THE DUTIES OF THE ARBITRATORS TO ASCERTAIN THE VALUE OF THE STOCK, AND IF ANY ARBITRATOR SHALL NEGLECT OR REFUSE TO APPEAR AT ANY MEETING APPOINTED BY THE ARBITRATORS, A MAJORITY MAY ACT IN THE ABSENCE OF SUCH ARBITRATOR. AFTER THE ACCEPTANCE OF THE OFFER, OR THE REPORT OF THE ARBITRATORS AS TO THE VALUE OF THE STOCK, THE DIRECTORS SHALL HAVE THIRTY (30) DAYS WITHIN WHICH TO PURCHASE THE VALUE OF THE STOCK, THE DIRECTORS SHALL HAVE THIRTY (30) DAYS WITHIN WHICH TO PURCHASE THE SAME AT SUCH VALUATION, BUT IF AT THE EXPIRATION OF THIRTY (30) DAYS, THE CORPORATION SHALL NOT HAVE EXERCISED THE RIGHT SO TO PURCHASE, THE OWNER OF THE STOCK SHALL BE AT LIBERTY TO DISPOSE OF THE SAME IN ANY MANNER HE MAY SEE FIT. NO SHARES OF STOCK SHALL BE SOLD OR TRANSFERRED ON THE BOOKS OF THE CORPORATION UNTIL THESE PROVISIONS HAVE BEEN COMPLIED WITH, BUT THE BOARD OF DIRECTORS MAY, IN ANY PARTICULAR INSTANCE, WAIVE THE REQUIREMENT.

ARTICLE VI

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

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

ARTICLE VII

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

Later Effective Date: Time:

ARTICLE VIII

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

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

Name: ATTY. DANIEL R. TENCZAR
No. and Street: 1 BRIDGEVIEW CIRCLE, SUITE #15
City or Town: TYNGSBORO State: MA Zip: 01879 Country: USA

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
PRESIDENT	BRIAN C LYNCH	13 JACQUES ROAD TYNGSBORO, MA 01879 USA
TREASURER	BRIAN C LYNCH	13 JACQUES ROAD TYNGSBORO, MA 01879 USA

SECRETARY

BRIAN C LYNCH

13 JACQUES ROAD
TYNGSBORO, MA 01879 USA

DIRECTOR

BRIAN C LYNCH

13 JACQUES ROAD
TYNGSBORO, MA 01879 USA

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

December

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

GROWTH AND SALE OF PLANTS AND PLANT PRODUCTS

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

No. and Street: 740 DUTTON STREET

City or Town: LOWELL State: MA Zip: 01852 Country: USA

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

No. and Street: 740 DUTTON STREET

City or Town: LOWELL State: MA Zip: 01852 Country: USA

which is

☒ its principal office ☐ an office of its transfer agent

☐ an office of its secretary/assistant secretary ☐ its registered office

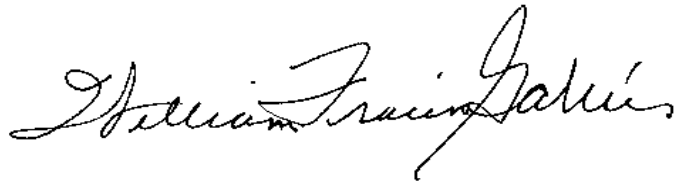
Signed this 12 Day of June, 2018 at 11:21:36 AM by the incorporator(s). *(If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.)*

BRIAN C. LYNCH

THE COMMONWEALTH OF MASSACHUSETTS

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

June 12, 2018 11:20 AM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

BY-LAWS
OF
PLATINUM HYDROLAB, INC.

ARTICLE 1 – OFFICES AND AGENT

- 1) **Principal Office** – The principal office of the corporation in the Commonwealth of Massachusetts shall be located in City of Lowell, Massachusetts. The corporation may have such other offices, either within or without the Commonwealth of Massachusetts, as the Board of Directors may designate or as the business of the corporation may require from time to time.
- 2) **Registered Office** – The registered office of the corporation required to be maintained in the Commonwealth of Massachusetts may be, but need not be, identical with the principal office or place of business in the Commonwealth of Massachusetts, and the address of the registered office may be changed from time to time by the Board of Directors in accord with the laws of the Commonwealth of Massachusetts.
- 3) **Registered Agent** – The Registered Agent of the corporation required by law shall be filed with the Secretary of State and the post office address to which he/she shall send process shall be initially designated in the articles of incorporation and may reassign or change address or be changed by the Board of Directors from time to time in accord with the laws of the Commonwealth of Massachusetts.

ARTICLE II – SHAREHOLDERS

Section 1 – Annual Meeting

The annual meeting of the Shareholders shall be held on the first Monday in the month of February in each year, beginning with the year after incorporation, at such time as to be determined, for the purpose of electing Directors and for the transaction of such other business as may come before the meeting. If the day fixed for the annual meeting shall be a legal holiday in the Commonwealth of Massachusetts such meeting shall be held on the next succeeding business day. If the election of Directors shall not be held on the day designated herein for any annual meeting of the Shareholders, or any adjournment thereof, the Board of Directors shall cause the election to be held at a special meeting of the Shareholders as soon thereafter as convenient.

Section 2 – Special Meetings

Special meetings of the Shareholders, for any purpose or purposes, unless otherwise prescribed by statute, may be called by the Chairman of the Board of Directors, the

President or by the Board of Directors, and shall be called by the Secretary at the written demand of record holders of not less than 10 percent of all the outstanding shares of the Corporation entitled to vote on any issue at the meeting or such lesser percentage as the Articles of Organization permit.

Section 3 – Place of Meeting

The Board of Directors may designate any place, either within or without the Commonwealth of Massachusetts, as the place of meeting for any annual meeting or for any special meeting called by the Board of Directors. A waiver of notice signed by all Shareholders entitled to vote at a meeting may designate any place, either within or without the Commonwealth of Massachusetts, as the place for the holding of such meeting. If no designation is made, or if a special meeting be otherwise called, the place of meeting shall be the registered office of the corporation in the Commonwealth of Massachusetts.

Section 4 – Notice of Meeting

Written or printed notice stating the place, day and hour of the meeting and in case of a special meeting, the purpose or purposes for which the meeting is called, and other contents required by law, shall be delivered not less than seven (7) nor more than sixty (60) days before the date of the meeting, either personally or by mail, at the direction of the Chairman, President, or the Secretary, or the officer or persons that called the meeting, to each Shareholder of record entitled to vote at such meeting. If mailed, such notice shall be deemed to be delivered when deposited in the United States mail, addressed to the Shareholder at his address as it appears on the records of the corporation, with postage thereon prepaid. Written waiver of attendance at such meeting, without protest by the Shareholder, shall be equivalent to the giving of such notice and cure any deficiency therein.

Section 5 – Fixing of Record Date

Subject to applicable law, for the purpose of determining Shareholders entitled to notice of or to vote at any meeting of Shareholders or any adjournment thereof, or Shareholders entitled to receive payment of any dividend, or in order to make a determination of Shareholders for any other proper purpose, the Board of Directors or an authorized officer may fix in advance a date as the record date for any such determination of Shareholders, such date in any case to be not more than seventy (70) days and, in case of a meeting of Shareholders, not less than ten (10) days prior to the date on which the particular action, requiring such determination of Shareholders, is to be taken, or in the case of a merger, consolidation, share exchange, dissolution or sale, lease or exchange of assets, not less than such notice required by law. If no record date is fixed for the determination of Shareholders entitled to notice of or to vote at a meeting of Shareholders, or Shareholders entitled to receive payment of a dividend, the date on which the resolution of the Board of Directors declaring such meeting or dividend is adopted, as the case may be, shall be the record date for such

determination of Shareholders. 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; provided, however, that any such adjournment shall not be more than one hundred and twenty (120) days after the date fixed for the original meeting.

Section 6 – Electronic Communications

Any one or more of the Shareholders may participate in a Shareholders' meeting by means of a conference telephone call, or similar communications equipment allowing all persons to hear each other at the same time as permitted by Massachusetts law. Such participation shall constitute presence in person at such meetings.

Section 7 – Voting Lists

Upon the fixing of a record date for a meeting, the officer or agent having charge of the stock transfer books for shares of the Corporation shall make a complete list of the stockholders entitled to vote at such meeting, or any adjournment thereof arranged in alphabetical order by voting group and class or series of shares, showing the address of and number of shares held by each stockholder. In the case of shares held in nominee name, the name, address and number of shares owned by each of the beneficial owners represented shall also be included. Such list shall be kept on file at the registered office of the Corporation or accessible on an electronic network and shall be subject to inspection by any stockholder at any time during usual business hours two (2) business days after notice of the meeting is given. Such list shall also be produced and kept open at the time and place of the meeting and shall be subject to inspection and copying by any stockholder, its agent, or its attorney, if for a proper purpose, during the whole time it is available for inspection.

Section 8 – Quorum

A majority of the outstanding shares of a voting group entitled to vote as a separate voting group of the corporation, represented in person or by proxy, shall constitute a quorum of such voting group at a meeting of Shareholders. If less than a majority of such outstanding shares are represented at a meeting, a majority of such shares so represented may adjourn the meeting from time to time without further notice. At such adjourned meeting each share which is represented at the original meeting shall be deemed present for the determination of a quorum at the adjourned meeting and any business may be transacted which might have been transacted at the meeting as originally notified. The Shareholders present at a duly organized meeting may continue to transact business until adjournment, notwithstanding the withdrawal of enough Shareholders to leave less than a quorum unless such shares were present only for the sole purpose of objection to notice given.

Section 9 – Proxies

At all meetings of Shareholders, a Shareholder may vote by proxy executed in writing or by electronic transmission by the Shareholder or by his duly authorized attorney-in-fact as provided by law. 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 eleven (11) months from the date of its execution, unless otherwise provided in the proxy.

Section 10 – Voting of Shares

10.1. Cumulative Voting – Each Shareholder entitled to vote for directors has the right to cumulate votes in the election of directors according to Massachusetts law, unless the Articles provide that there shall be no cumulative voting.

10.2. Vote – Subject to the provisions of Section 11 of this Article II and the provisions of the Articles of Organization, each outstanding share entitled to vote shall be entitled to one vote upon each matter submitted to a vote at a meeting of Shareholders. Corporate action, other than as set forth in Section 11, shall be authorized by a majority of qualified votes cast at a Shareholder's meeting. A Shareholder is deemed to have voted all of the shares in the same way, absent direction to vote shares differently. A shareholder may vote by electronic transmission as permitted under the laws of the Commonwealth of Massachusetts.

10.3. Voting by Nominees – Upon compliance with Massachusetts law, the Board of Directors may establish a procedure by which the beneficial owner of shares that are registered in the name of a nominee may be recognized by the corporation as the Shareholder for voting and other rights of Shareholders.

Section 11 – Informal Action by Shareholders

Any action required to be taken at any meeting of the Shareholders, or any other action which may be taken at a meeting of the Shareholders, may be taken without a meeting if a consent in writing, setting forth the action so taken, shall be signed by all of the Shareholders entitled to vote with respect to the subject matter thereof. Such action is effective when a writing signed by all the Shareholders is received by the corporation, unless a different time is provided in such written action, and such receipt shall also be the record date for determining Shareholders entitled to vote on such action.

ARTICLE III – BOARD OF DIRECTORS

Section 1 – General Powers

The business and affairs of the corporation shall be managed under the direction of its Board of Directors under the authority granted by the law of the Commonwealth of Massachusetts.

Section 2 – Number, Tenure, Election, Removal, Resignation, Vacancies and Qualification

Directors shall be natural persons. The first Board of Directors may be named in the Articles or elected by Incorporators or Shareholders. The number of directors of the corporation shall be determined by resolution of the Board of Directors or Shareholders or as set forth in the bylaws, but shall in the absence of such designation be the number of Shareholders of the corporation entitled to elect directors, and may be increased or decreased in accordance with Massachusetts law. Directors may be elected to fill vacancies and newly created directorships by the Board of Directors. Each Director shall hold office until the next annual meeting of Shareholders and until his successor shall have been elected and qualified; or elected for a term not to exceed that permitted under Massachusetts law. A Director may resign by filing his resignation with the Secretary, to take effect as set forth in such resignation, which shall have the effect of creating a vacancy. The articles or these bylaws shall determine Directors' qualifications, but a Director need not be a resident of the Commonwealth of Massachusetts or Shareholder of the corporation.

Section 3 – Regular Meetings

A regular meeting of the Board of Directors shall be held without other notice than this Bylaw immediately after, and at the same place as, the annual meeting of Shareholders. The Board of Directors may provide, by resolution, the time and place, either within or without the Commonwealth of Massachusetts, for the holding of additional regular meetings without other notice than such resolution.

Section 4 – Special Meetings

Special meetings of the Board of Directors may be called by or at the request of the Chairman, President or any Director. The person or persons authorized to call special meetings of the Board of Directors may fix any place, either within or without the Commonwealth of Massachusetts, as the place for holding any special meeting of the Board of Directors called by them.

Section 5 – Notice

No notice need be given for regular meetings of the Board of Directors. Notice of any special meeting of the Board of Directors shall be given at least two (2) days prior thereto by notice delivered personally or mailed to each Director. If mailed, such notice shall be deemed to be delivered when deposited in the United States mail so addressed with postage thereon prepaid. If notice be given by telegram or electronic communication, such notice shall be deemed to be delivered when the notice is sent. Any Director may waive notice of any meeting in a writing to be filed with the minutes of such meeting. The attendance of a Director at a meeting shall constitute a waiver of notice of such meeting, except where a Director attends a meeting for the express purpose of objecting to the transaction of any business because the meeting is not lawfully called or convened. Neither the business to be transacted at, the purpose of, any regular or special meeting of the Board of Directors need be specified in the notice or waiver of notice of such meeting.

Section 6 – Quorum and Adjournments

A majority of the Directors currently holding office shall constitute a quorum for the transaction of business at any meeting of the Board of Directors, but if less than all Directors are present at a meeting, a majority of the Directors present may adjourn the meeting from time to time without further notice. A Director may give advance written consent or opposition to a proposal to be acted on at a Board of Directors meeting.

Section 7 – Manner of Acting

The act of a majority of the Directors present at a meeting shall be the act of the Board of Directors. All members may consent in writing to an action without a meeting.

Section 8 – Electronic Meetings

Any one or more of the Directors may participate in a meeting of the Board of Directors or any Committee thereof by means of a conference telephone call, or similar communications equipment allowing all persons to hear each other at the same time. Such participation shall constitute presence in person at such meetings.

Section 9 – Vacancies

Any vacancy occurring in the Board of Directors may be filled by the vote of the remaining Directors though less than a quorum of the Board of Directors or voting group, or by the vote of shareholders. A director elected to fill a vacancy shall be elected for the unexpired term of his predecessor in office. A vacancy occurring at a specific later date may be filled before the vacancy occurs, but the new director shall not take office until the vacancy occurs.

Section 10 – Compensation

The Board of Directors may fix the compensation of directors serving in any capacity.

Section 11 – Presumption of Assent

A Director of the corporation who is present at a meeting of the Board of Directors at which action on any corporate matter is taken shall be presumed to have assented to the action taken unless his dissent shall be entered in the minutes of the meeting or unless he/she shall file his written dissent to such action with the person acting as the secretary of the meeting promptly after the adjournment of the meeting. Such right to dissent shall not apply to a Director who voted in favor of such action.

Section 12 – Removal

The Shareholders or Directors of the corporation may remove a Director pursuant to Massachusetts law.

Section 13 – Board Committees

The Board of Directors may establish committees having the authority of the Board of Directors pursuant to Massachusetts law.

Section 14 – Shareholder Management

The Shareholders may take any action that the Board of Directors has the power to make pursuant to Massachusetts law as set forth in the articles of incorporation of the corporation.

ARTICLE IV – OFFICERS

Section 1 – Number

The officers of the Corporation may be a Chairman of the Board of Directors, President, Chief Executive Officer, one or more Vice Presidents (the number thereof to be determined by the Board of Directors), a Secretary, and a Treasurer or Chief Financial Officer, each of whom shall be elected by the Board of Directors. Such other officers and assistant officers as may be deemed necessary may be elected or appointed by the Board of Directors. Any two or more offices may be held by the same person.

Section 2 – Election and Term of Office; Resignation

The officers of the corporation to be elected by the Board of Directors shall be elected annually by the Board of Directors at the first meeting of the Board of Directors held after each annual meeting of the Shareholders, or as soon thereafter as is convenient. Each officer shall hold office until his successor shall have been duly elected and shall have

qualified or until his death or until he/she shall resign or shall have been removed in the manner hereinafter provided. In the absence of an election or appointment, the person exercising such powers is deemed to have been elected to such offices under Massachusetts law.

Section 3 – Removal

Any officer or agent elected or appointed by the Board of Directors may be removed by the Board of Directors whenever in its judgment the best interests of the corporation would be served thereby, but such removal shall be without prejudice to the contract rights, if any, of the person so removed.

Section 4 – Vacancies

A vacancy in any office because of death, resignation, removal, disqualification or otherwise may be filled by the Board of Directors for the unexpired portion of the term and until the successor shall have been chosen and qualified.

Section 5 – Officers

The Board of Directors may appoint the following officers who shall exercise such duties as set forth herein or as authorized by the Board of Directors:

5.1 Chairman of the Board of Directors

The Board of Directors shall elect the Chairman of the Board of Directors from its membership. He/She shall preside at the meetings of the Board and Shareholders and perform such other duties as may be assigned to him/her by the Board of Directors from time to time.

5.2. President/CEO

The President shall be the Chief Executive Officer of the corporation and, subject to the control of the Board of Directors, shall in general supervise and control all of the business and affairs of the corporation. He/She shall, when the Chairman of the Board of Directors is absent, preside at all meetings of the Shareholders and of the Board of Directors. He/She may sign, with the Secretary or any other proper officer of the corporation thereunto authorized by the Board of Directors, certificates for shares of the corporation, any deeds, mortgages, bonds, contracts, or other instruments which the Board of Directors has authorized to be executed, except in cases where the signing and execution thereof shall be expressly delegated by the Board of Directors or by these bylaws to some other officer or agent of the corporation, or shall be required by law to be otherwise signed or executed; and in general shall perform all duties incident to the office of President and such other duties as may be prescribed by the Board of Directors from time to time.

5.3 The Vice Presidents

In the absence of the President or in the event of his/her death, inability, or refusal to act, the Vice President (or in the event there be more than one Vice President, the Vice President in the order designated at the time of their election, or in the absence of any designation, then in the order of their election) shall perform the duties of the President, and when so acting, shall have all the powers of and be subject to all the restrictions upon the President. Any Vice President may sign, with the Secretary or an Assistant Secretary, certificates for shares of the corporation; and shall perform such other duties as from time to time may be assigned to him/her by the President or by the Board of Directors.

5.4 The Secretary

The Secretary shall: (a) keep the minutes of the Shareholders' and of the Board of Directors' meetings in one or more books provided for that purpose; (b) see that all notices are duly given in accordance with the provisions of these bylaws or as required by law; (c) be custodian of the corporate records and the seal of the corporation and see that the seal of the corporation is duly authorized; (d) keep a register of the post office address of each Shareholder which shall be furnished to the Secretary by such Shareholder; (e) sign with the President, or Vice President, certificates for shares of the corporation, the issuance of which shall have been authorized by resolution of the Board of Directors; (f) have general charge of the stock transfer books of the corporation; and (g) in general perform all duties incident to the office of Secretary and such other duties as from time to time may be assigned to him/her by the President or by the Board of Directors.

5.5 The Treasurer/CFO

The Treasurer shall be the Chief Financial Officer of the corporation and shall have charge and custody of and be responsible for all funds and securities of the corporation and shall keep regular books of all receipts and disbursements of the corporation, and in general shall perform such other duties as may be assigned to him/her by the Board of Directors or the President. The Treasurer shall disburse out of the funds of the corporation payment of such just demands against the corporation as may from time to time be authorized by the Board of Directors. The Treasurer shall sign or countersign all checks, notes and such other instruments or obligations as require his/her signature, and shall perform all duties incident to his/her office, or that are properly required of him/her by the Board of Directors, provided, however, that by resolution of the Board of Directors' authority and responsibility for the signing of checks, notes and other obligations may be assigned to either the President or Treasurer or such other officer or officers as the Board of Directors may designate from time to time.

Section 6. Transfer of Authority

In case of the absence of any officer of the corporation or for any other reason the Board of Directors deems sufficient, the Board of Directors may transfer the powers or duties of

that officer to any other officer, Director or employee of the corporation and any officer may delegate their duties to persons functioning in subordinate offices.

Section 6.1 Compensation

The salaries of the principal officers shall be fixed from time to time by the Board of Directors. No officer shall be prevented from receiving his/her salary by reason of the fact that he/she is also a Director of the corporation.

ARTICLE V. CONTRACTS

Section 1. 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 the specific instances.

ARTICLE VI. CERTIFICATES FOR SHARES AND THEIR TRANSFER

Section 1. Determination of Shares

The Board of Directors shall determine if some or all of any or all classes and series of its shares shall be un-certificated or certificated shares.

Section 2. Certificates for Shares

If the Board of Directors determines to issue Certificates representing fully paid and non-assessable shares of the common stock of the corporation, such certificates shall be in such form as shall be similar to that annexed to the minutes of the first meeting of the Board of Directors or otherwise as determined by the Board of Directors. Such certificates shall be signed by the President or a Vice President and by the Secretary or an Assistant Secretary and the Corporation Seal shall be affixed thereto. All certificates for shares shall be consecutively numbered or otherwise identified. The name and address of the person to whom the shares represented thereby are issued, with the number of shares and date of issue, shall be entered on the stock transfer books of the corporation. All certificates surrendered to the corporation for transfer shall be canceled and no new certificate shall be issued until the former certificate for a like number of shares shall have been surrendered and canceled, except that in case of a lost, destroyed or mutilated certificate a new one may be issued therefore upon such terms and indemnity to the corporation as the Board of Directors may prescribe.

Section 3. Transfer of Shares

Transfer of shares of the corporation shall be made only on the stock transfer books of the corporation by the holder of record thereof or by his/her legal representative, who shall furnish proper evidence of authority to transfer, or by his/her attorney there-unto

authorized by power of attorney duly executed and filed with the Secretary of the corporation, and on surrender for cancellation of the certificate for such shares. The person in whose name shares stand on the books of the corporation shall be deemed by the corporation to be the owner thereof for all purposes. The Board of Directors or Shareholders may impose a restriction on the transfer of shares in accordance with Massachusetts law.

Section 4. Lost or Destroyed Certificates.

The holder of any certificate representing shares of the corporation shall immediately notify the corporation of any loss or destruction of the certificates (s) representing same. The corporation may issue a new certificate in the place of any certificate theretofore issued by it alleged to have been lost or destroyed. On production of such evidence of loss or destruction as the Board of Directors in its discretion may require, the Board of Directors may, in its discretion, require the owner of the lost or destroyed certificate, or such person's legal representatives, to give the corporation a bond in such sum as the Board may direct, and with such surety or sureties as may be satisfactory to the Board of Directors to indemnify the corporation against any claims, loss, liability or damage it may suffer on account of the issuance of the new certificate. A new certificate may be issued without requiring any such evidence, bond, or indemnity subject to the discretion of the Board of Directors.

ARTICLE VII. FISCAL YEAR

The fiscal year of the corporation shall begin on the first day of January and end on the thirty-first day of December in each year. The Board of Directors shall have the power to change the fiscal year by resolution duly adopted.

ARTICLE VIII NAME

The exclusive name of this corporation that has been reserved as required by law shall be as above written.

ARTICLE IX. SEAL

The Board of Directors shall provide a corporate seal which shall have inscribed thereon the (1) word "Seal" or "Corporate Seal", and may contain (2) the name of the corporation, (3) the Commonwealth of Massachusetts as place of incorporation, and may contain (4) abbreviations or combinations of such terms and be affixed, engraved, printed, placed, stamped or in any other manner be reproduced on any document.

ARTICLE X. WAIVER OF NOTICE

Whenever any notice is required to be given to any Shareholder or Director of the corporation under the provisions of these bylaws or under the provisions of the articles of incorporation or under the provisions of the Massachusetts law, a waiver thereof in

writing, signed by the person or persons entitled to such notice, whether before or after the time stated therein, shall be deemed equivalent to the giving of such notice.

ARTICLE XI. AMENDMENTS

These bylaws may be altered, amended or repealed and new bylaws may be adopted by Shareholders or the Board of Directors at any regular or special meeting of the Board of Directors or Shareholders by a vote of such Shareholders or Directors entitled to vote in accordance with the laws of Massachusetts.

ARTICLE XII. FURTHER AUTHORITIES

The Board of Directors may grant, delegate or assign to any officer of the corporation any of the duties and authorities herein above designated to be performed by any officer or may enlarge or restrict the duty and authority of any officer, either temporarily or permanently, as long as such powers and authorities shall not be inconsistent with these bylaws.

ARTICLE XIII. SEVERABILITY

Any provision of these bylaws, or any amendment or alteration thereof, which has been constructed to be in violation of Massachusetts law, as amended, and any amendment or replacement thereto, shall not in any way render the remaining provisions invalid.

ARTICLE XIV. DIRECTOR AND OFFICER INDEMNIFICATION

The corporation shall indemnify any person acting on its behalf in accordance with the law of Massachusetts. The indemnification provided hereby shall not be deemed exclusive of any other right to which anyone seeking indemnification thereunder may be entitled under any bylaw, agreement, or otherwise, both as to action in his/her official capacity and as to action in another capacity while holding such office. The corporation may purchase and maintain insurance on the behalf of any Director, officer, agent, employee or former Director or officer or other person, against any liability asserted against them and incurred by him/her.

Adopted on the date of incorporation, being the 1st day of May, 2018 by the Incorporators/ Board of Directors.

Incorporator- Brian C. Lynch

Attest:

(Seal)

Secretary- Brian C. Lynch



Business Plan

November 21, 2018

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1. EXECUTIVE SUMMARY

1.1 Mission Statement and Message from the CEO

Platinum HydroLab, Inc. (“**PHy**”) is a Marijuana Establishment (“**ME**”) committed to creating a safe and clean community environment that provides consistent, high quality cannabis and cannabis products to licensed “adult use” dispensaries in the State of Massachusetts.

1.2 License Type

PHy is applying for a Certificate of Registration from the Massachusetts Cannabis Control Commission (the “**Commission**”) to operate a Marijuana Establishment as both a Marijuana Cultivation and Marijuana Product Manufacturing in Lowell, Massachusetts.

1.3 Products

PHy will offer traditional sativa, indica, and hybrid cannabis flowers. In addition, PHy will offer a wide range of products that will allow PHy to serve customers in the wholesale market (the registered adult use dispensaries) with a wide variety of needs. The products PHy intends to offer include, but will not be limited to:

1. Concentrates
2. Topical Salves
3. Tinctures
4. Pre dosed oil Vaporizers
5. Food/Beverages

1.5 What Drives Us

PHy’s goals include:

1. Serving our clients, the retailers, and their customers 21 years of age or older with a wide variety of high quality, consistent, laboratory-tested cannabis and derivatives;
2. Assisting local communities in offsetting the cost of PHy’s operations within their communities;
3. Hiring employees and contractors from within the communities served;
4. Hiring employees and contractors from communities that have been particularly harmed by the war on drugs;
5. Hiring employees from economically distressed communities and giving them the space and knowledge to flourish professionally within PHy and the cannabis industry as a whole;
6. Having a diverse and socially representative pool of employees;
7. Empowering the next generation of entrepreneurs and leaders through hiring, training, and teaching;
8. Running an environmentally friendly ME in the Commonwealth of Massachusetts through the use of efficient cultivation methods; and
9. Creating branded marijuana products that are safe, effective, consistent, and high quality.

2. COMPANY DESCRIPTION

2.1 Structure

PHy is a Massachusetts domestic for-profit corporation interested in applying for a Certificate of Registration from the Commission to operate a ME in the Commonwealth.

PHy will file, in a form and manner specified by the Commission, an application for licensure as a ME consisting of three packets: An Application of Intent packet; a Background Check packet; and a Management and Operations Profile packet.

2.2 Operations

PHy will be located in Lowell, Massachusetts and has leased a facility at 740 Dutton Street for its Marijuana Cultivator and Marijuana Product Manufacturer operations.

The facility is well positioned and matches the ideal picture of a safe, nondescript cultivation and processing site. The business will be launching with just one site in Lowell but has plans to open other grow sites in key locations in Massachusetts.

The facility encompasses a total of 5,520 square feet, with approximately 1,920 square feet dedicated exclusively to a two tier cultivation and approximately 3,600 square feet dedicated to supporting cultivation and processing efforts.

PHy will establish inventory controls and procedures for reviewing comprehensive inventories of marijuana products in the process of cultivation and finished, stored marijuana; conduct a monthly inventory of marijuana in the process of cultivation and finished, stored marijuana; conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory; and promptly transcribe inventories if taken by use of an oral recording device.

PHy will tag and track all marijuana seeds, clones, plants, and marijuana products using a seed-to-sale methodology in a form and manner approved by the Commission.

No marijuana product, including marijuana, will be sold or otherwise marketed that is not tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

PHy will maintain records which will be available for inspection by the Commission upon request. The records will be maintained in accordance with generally accepted accounting principles. Records will be maintained for at least 12 months.

PHy will obtain and maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, except as provided in 935 CMR 500.105(10)(b) or otherwise approved by the Commission. The deductible for each policy will be no higher than \$5,000 per occurrence.

PHy will provide adequate lighting, ventilation, temperature, humidity, space, and equipment, in

accordance with applicable provisions of 935 CMR 500.105 and 500.110.

All recyclables and waste, including organic waste composed of or containing finished marijuana and marijuana products, will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations. Organic material, recyclable material, solid waste, and liquid waste containing marijuana or by-products of marijuana processing will be disposed of in compliance with all applicable state and federal requirements.

PHy will demonstrate consideration of the factors for Energy Efficiency and Conservation outlined in 935 CMR 500.105(15) as part of its operating plan and application for licensure.

Prior to commencing operations, PHy will provide proof of having obtained a surety bond in an amount equal to its licensure fee payable to the Marijuana Regulation Fund. The bond will ensure payment of the cost incurred for the destruction of cannabis goods necessitated by a violation of St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000 or the cessation of operation of PHy.

PHy and PHy's agents will comply with all local rules, regulations, ordinances, and bylaws.

2.3 Security

PHy will contract with a professional security and alarm company to design, implement, and monitor a comprehensive security plan to ensure that the facility is a safe and secure environment for employees and the local community.

PHy's state-of-the-art security system will consist of complete perimeter alarming as well as duress, panic, and holdup alarms connected to local law enforcement for efficient notification and response in the event of a security threat. The system will also include a failure notification system that will immediately alert the executive management team if a system failure occurs.

A redundant alarm system will be installed to ensure that active alarms remain operational if the primary system is compromised.

Interior and exterior HD video surveillance of all areas that contain marijuana, entrances, exits, and parking lots will be operational 24/7 and available to the City of Lowell Police Department. These surveillance cameras will remain operational even in the event of a power outage.

The exterior of the dispensary and surrounding area will be sufficiently lit, and foliage will be minimized to ensure clear visibility of the area at all times.

Only PHy's registered agents and other authorized visitors (e.g. contractors, vendors) will be allowed access to the facility through a complete key carded door system, and a visitor log will be maintained in perpetuity.

All agents and visitors will be required to visibly display an ID badge, and PHy will maintain a current list of individuals with access.

On-site consumption of marijuana by PHy's employees and visitors will be prohibited.

PHy will have security personnel on-site during business hours.

2.4 Benefits to the Municipality

PHy looks forward to working cooperatively with the City of Lowell (which approved the 2016 Ballot Question 4 legalizing adult use marijuana with over 55% of the vote) to ensure that PHy operates as a responsible, contributing member of the Lowell community. PHy anticipates establishing a mutually beneficial relationship with the city in exchange for permitting PHy to site and operate in Lowell. The City stands to benefit in various ways, including but not limited to the following:

- **Jobs:**
 - A Cultivation and Processing facility will add at least 12 full-time jobs, in addition to hiring qualified, local contractors and vendors.
- **Monetary Benefits:**
 - A Host Community Agreement with significant monetary donations will provide the City with additional financial benefits beyond local property taxes.
- **Access to Quality Product:**
 - PHy will allow qualified retailers in the Commonwealth to have access to high quality marijuana and marijuana products that are tested for cannabinoid content and contaminants that their customers (the consumers) will require.
- **Control:**
 - In addition to the Commission, the Lowell Police Department and other municipal departments will have oversight over PHy's security systems and processes.
- **Responsibility:**
 - PHy is comprised of experienced cultivators and professionals who will be thoroughly background checked and scrutinized by the Commission.
- **Economic Development:**
 - PHy's renovation of 740 Dutton St will revitalize the Dutton St area and contribute to the overall economic development of the local community.

2.5 Zoning

The address for the ME is 740 Dutton Street Lowell, MA. This Cultivation and Processing facility is located in the Light Industry, Manufacturing, & Storage district and complies with all Lowell zoning requirements.

In accordance with Lowell's Zoning Bylaws, the proposed property is not located within one thousand (1 ,000) feet of another presently existing or permitted Marijuana Dispensary or Recreational Retail Facility or five hundred (500) feet of public or private elementary school, middle school, secondary school, or any school or college serving a student population where any of the student population is under twenty-one years of age.

In accordance with the Commission's regulations, the property is not located within 500 feet of a public or private school providing education to children in kindergarten or grades 1 through 12.

3. MARKET RESEARCH

3.1 Industry

PHy's proposed location is in industrial downtown area of Lowell. Surrounding areas include Dracut, Billerica, Chelmsford Tyngsborough and Tewksbury.

3.2 Customers

In Massachusetts, sales are expected to increase from \$106 million in 2017 to \$457 million in 2018, and eventually to \$1.4 billion in 2025, according to New Frontier Data.

3.3 Competitors

PHy's competitors are unknown at this point but will include all other Massachusetts based wholesale cultivators and product manufacturers.

3.4 Competitive Advantage

PHy's competitive advantages over their competition include a team, each with over 20 years of hydroponic growing experience, investor/landlord/owner with 50 years of business experience in Lowell, an experienced General Manager with 20 years' experience running businesses and a seed collection.

In every business, there is competition. However, the retail cannabis industry is known to be highly competitive. PHy possesses several strengths which will separate PHy from the competition. The industry is rapidly growing, and clients are scrutinizing the quality of cannabis and concentrates available, the delivery service offered, the branding of the products.

3.5 Regulations

PHy is a Marijuana Establishment, consistent with the objectives of St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000.

PHy will be registered to do business in the Commonwealth as a domestic business corporation or another domestic business entity. PHy is currently and will maintain the corporation in good standing with the Massachusetts Secretary of the Commonwealth and the Department of Revenue.

PHy will apply for all state and local permits and approvals required to renovate and operate the facility.

PHy will also work cooperatively with various municipal departments to ensure that the proposed facility complies with all state and local codes, rules and regulations with respect to design, renovation, operation, and security.

PHy's facility will grow and process all marijuana products on site and securely deliver all of its wholesale products to other state licensed retailers.

4. PRODUCT / SERVICE

4.1 Product & Service

PHy will house hydroponic cultivation site. The extensive seed and clone collection PHy currently has will begin the process of creating the female only collection of plants that will mother the eventual rooms of flowering plants. These clones will work their way through the high speed vegetative tiers until ready for the main flowering areas. The 2 tier LED flowering rooms will utilize PHy's step by step growing process creating a consistent harvest of the areas best marijuana flowers. PHy's growing and pruning methods including the cocktail of tried and true flowering additives will create abundant harvests of the most crystal covered and THC rich plants possible in this small space.

PHy will also house a processing facility. The consistent harvest of flowers will allow for multiple types of concentrate collection. On all of its food grade steel work surfaces, PHy will use various methods of collecting the concentrated trichomes including but not limited to oil extraction, mesh filtering or gas/liquid extraction. These will be packaged in wholesale quantity and sold to the state retailers for resale to the public. Using the harvested flowers, PHy will provide multiple branded products which will also be sold wholesale to the Licensed Recreational dispensary.

Our core product as a cultivator will be marijuana, which will come in a variety of strains and product types. We will also engage in the sale of concentrates, edibles and pre measured vapor oils.

4.2 Pricing Structure

PHy's pricing structure will vary based on market conditions. PHy plans to produce products of superior quality and will price its products accordingly.

4.3 Research & Development

PHy research and development activities include constant training and retraining of employees, constant development of the growing method utilizing the newest and most efficient ways of producing a top shelf product and constant development of sustainable alternatives within the field.

5. MARKETING & SALES

5.1 Growth Strategy

PHy's plan to grow the company includes:

1. Strong and consistent branding;
2. Intelligent, targeted, and compliant marketing programs;
3. A compelling loyalty program;
4. An exemplary client experience; and
5. A caring and thoughtful staff made of consummate professionals

PHy plans to seek additional, appropriate locations in the surrounding area to expand business and reach an increased number of customers in the future.

5.2 Communication

PHy will engage in reasonable marketing, advertising, and branding practices that do not jeopardize the public health, welfare, or safety of the general public, or promote the diversion of marijuana or marijuana use in individuals younger than 21 years old. Any such marketing, advertising, and branding created for viewing by the public will include the statement: "Please Consume Responsibly," in a conspicuous manner on the face of the advertisement and will include a minimum of two of the warnings, located at 935 CMR 500.105(4)(a), in their entirety in a conspicuous manner on the advertisement.

All marketing, advertising, and branding produced by or on behalf of PHy will include the following warning, including capitalization, in accordance with M.G.L. c. 94G, § 4(a^{1/2})(xxvi): "This product has not been analyzed or approved by the Food and Drug Administration (FDA). There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN. There may be health risks associated with consumption of this product. Marijuana can impair concentration, coordination, and judgment. The impairment effects of edible marijuana may be delayed by two hours or more. In case of accidental ingestion, contact poison control hotline 1-800-222-1222 or 9-1-1. This product may be illegal outside of MA."

PHy will communicate with customers through:

1. A company run website;
2. Direct verbal relationships with clients;
3. Popular cannabis discover networks such as WeedMaps and Leafly;
4. Popular social media platforms such as Instagram, Facebook, Twitter, and SnapChat; and
5. Opt-in direct communications;

PHy will provide a catalogue and a printed list of the prices and strains of its wholesale marijuana and marijuana products available to clients and will post the same catalogue and list on its website.

5.3 Sales

PHy will sell its products by engaging clients with knowledgeable sales professionals, an

extensive portfolio of varieties creating different effects for the consumer, providing the client with the best products on the market and creating long term orders based on exactly what the clients want at the time.

PHy will seek events where 85% or more of the audience is reasonably expected to be 21 years of age or older, as determined by reliable, current audience composition data. At these events, PHy will market its products and services to reach a wide range of qualified consumers.

PHy will ensure that all marijuana products that are provided for sale to consumers are sold in tamper or child-resistant packaging. Packaging for marijuana products sold or displayed for consumers, including any label or imprint affixed to any packaging containing marijuana products or any exit packages, will not be attractive to minors.

Packaging for marijuana products sold or displayed for consumers in multiple servings will allow a consumer to easily perform the division into single servings and include the following statement on the exterior of the package in a printed font that is no smaller than ten-point Times New Roman, Helvetica, or Arial, including capitalization: “INCLUDES MULTIPLE SERVINGS.” PHy will not sell multiple serving beverages and each single serving of an edible marijuana product contained in a multiple-serving package will be marked, stamped, or otherwise imprinted with the symbol issued by the Commission under 935 CMR 500.105(5) that indicates that the single serving is a marijuana product. At no point will an individual serving size of any marijuana product contain more than five (5) milligrams of delta-nine tetrahydrocannabinol.

5.4 Logo

PHy has developed a logo to be used in labeling, signage, and other materials such as letterhead and distributed materials. The logo is discreet, unassuming, and does not use medical symbols, images of marijuana, related paraphernalia, or colloquial references to cannabis or marijuana.

An image of the logo can be found below:



6. FINANCIAL PROJECTIONS

Fiscal Year	FIRST FULL FISCAL YEAR PROJECTIONS 1	SECOND FULL FISCAL YEAR PROJECTIONS 2	THIRD FULL FISCAL YEAR PROJECTIONS 3
Projected Revenue	\$ 5,620,800	\$ 5,412,000	\$ 5,164,000
Projected Expenses	\$ 1,200,000	\$ 540,000	\$ 600,000
VARIANCE:	\$ 4,420,800	\$ 4,872,000	\$ 4,564,000
Projected % of customer growth rate annually	---	5%	5%
Estimated cost per ounce	\$ 300	\$ 275	\$ 250
Total FTEs in staffing	10	12	12
Total marijuana inventory for the year (in lbs.)	1,300	1,429	1,499
Total marijuana sold for the year (in lbs.)	1,171	1,230	1,291
Total marijuana left for roll over (in lbs.)	129	199	208

7. TEAM

7.1 General

PHy has put together a team to implement the operations of the ME. PHy intends to create at least 12 full-time staff positions within the first three years of operations in Lowell.

7.2 Founder

Brian Lynch is a current state medical marijuana patient growing and processing all of his own medicine and has over 25 years' experience in the hydroponic growing field. He has worked on vegetable farms and founded the Lowell based Rafferty Farms (farm stand and greenhouses) and the Methuen based Baremeadow Farms, a 55 acre organic farm and hydroponic greenhouses. Brian has travelled all over the legal marijuana world consulting with, designing and building dozens of large grow operations and collecting seeds, clones and tips from some of the best cultivators in the country. Brian is also the production manager for the yearly MASSCANN Freedom Rally in Boston putting him in touch with growers from all over the area and the rest of the country.

7.3 CEO & CFO

CEO - Brian Lynch is a current state medical marijuana patient growing and processing all of his own medicine and has over 25 years' experience in the hydroponic growing field and running small business locally.

CFO - Elizabeth Skinsacos has been a business owner and one of Lowell's top real estate salespeople for 50 years. Elizabeth owns the building that the facility will be housed in and is the major financial investor in PHy.

7.4 Head of Cultivation

Anthony Clark is the head of cultivation with 15+ years general growing and hydro experience. The Head of Cultivation is responsible for all daily operations and maintenance of the Cultivation Facility. The Head of Cultivation will:

- Be responsible for implementing policies with the Cultivation Facility;
- Coordinate space assignments;
- Receive and review work requests;
- Coordinate repairs and maintenance;
- Be responsible for supervision and training of agents;
- Provide mandatory training for new agents;
- Maintain a record of space allocations;
- Work with the Growing Technician to promote successful operations in the Cultivation Facility;
- Program and monitor the Environmental Control System (DDC);
- Maintain a database of environmental controls and conditions;
- Adjust DDC for optimum efficiency of operation; and
- Provide pesticide recommendations and ensure Integrated Pest Management (IPM) Program is sufficient.

7.5 Head of Security

Under the supervision of the Chief Executive Officer, the Head of Security is responsible for the development and overall management of the Security Policies and Procedures for PHy, implementing, administering, and revising the policies as needed. In addition, the Head of Security will perform the following duties:

- Provide general training to PHy] agents during new hire orientation or re-current trainings throughout the year;
- Provide training specific for Security Agents prior to the Security Agent commencing job functions;
- Review and approve incident reports and other reports written by Security Agents prior to submitting to the executive management team – follow up with security agent if needed;
- Maintain lists of agents authorized to access designated areas of the [ME SHORT NAME] facility, including cash and product storage vaults, surveillance and network equipment room, and other highly sensitive areas of the [ME SHORT NAME] facility;
- Lead a working group comprised of the Chief Executive Officer, Chief Operating Officer, Head of Security, Head of Cultivation, and any other designated advisors to ensure the current policies and procedures are properly implemented, integrated, effective, and relevant to ensure the safety of [ME SHORT NAME] agents and assets;
- Ensure that all required background checks have been completed and documented prior to an agent performing job functions; ensure agent is granted appropriate level of access to the facility necessary to complete his/her job functions;
- Maintain all security related records, incident reports and other reports written by security agents;
- Evaluate and determine the number of security agents assigned to each shift and proper shift change times; and
- Maintain frequent contact with the Lowell Police and Fire Department.

7.5 Additional Staff

- Valerie Callahan - COO/GM, (15+ years local business owner)
- Steven Milliard - General Grow Tech (20+ years hydroponic experience)
- Michael Frobese - Trimming/Processing Manager (20+ years cultivation/processing experience)

No individual on the PHy team is a controlling person with over more than three licenses in a particular class of license.

8. FINAL REMARKS

PHy has the experience and know-how to safely and efficiently serve clients with high quality, consistent, laboratory-tested grade A cannabis and derivatives. PHy hopes to bring its high quality standards to adult-use Consumers to provide them with a safe and clean community environment. To accomplish this, PHy will leverage and expand its current cultivation while maintaining its committed services to existing and future Adult Use dispensaries. Further, PHy will leverage existing protocols and standard operating procedures to control, review, test, and track inventory, consistent with regulations set forth by the Commission. PHy's state-of-the-art security systems and contracted professional security and alarm companies, along with other comprehensive security measures will also help ensure a safe and secure environment for both clients and staff and will help deter and prevent diversion.

In Massachusetts, cannabis-related sales are expected to increase from \$106 million in 2017 to \$457 millions in 2018, and eventually to \$1.4 billion in 2025. PHy is prepared to position itself well in this market and contribute to this growth through a highly experienced team of successful operators working under an established framework of high quality standard operating procedures, research and development plans, and growth strategies. In doing so, PHy looks forward to working cooperatively with all the municipalities in which it is operating to help spread the benefits this market will yield.

PLAN FOR OBTAINING LIABILITY INSURANCE

Platinum HydroLab, Inc. (“Platinum HydroLab”) will contract with an insurance provider to maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate annually and product liability coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate annually. The policy deductible will be no higher than \$5,000 per occurrence. Platinum HydroLab will consider additional coverage based on availability and cost-benefit analysis.

If adequate coverage is unavailable at a reasonable rate, Platinum HydroLab will place in escrow at least \$250,000 to be expended for liabilities coverage (or such other amount approved by the Commission). Any withdrawal from such escrow will be replenished within 10 business days of any expenditure. Platinum HydroLab will keep reports documenting compliance with 935 CMR 500.105(10) in a manner and form determined by the Commission pursuant to 935 CMR 500.000.

DIVERSITY PLAN

Overview

Platinum Hydrolab, Inc. (“PHy”) is dedicated to promoting equity in its operations for diverse populations, which the Commission has identified as the following:

1. Minorities;
2. Women;
3. Veterans;
4. People with disabilities; and
5. People of all gender identities and sexual orientations.

To support such populations, PHy has created the following Diversity Plan (the “Plan”) and has identified and created goals/programs to promote equity in PHy’s operations.

Goals

In order for PHy to promote equity for the above-listed groups in its operations, PHy has established the following goals:

1. Increasing the number of individuals falling into the above-listed demographics working in the establishment and providing tools to ensure their success; and
2. Increasing the number of businesses owned by individuals falling into the above-listed demographics that can contract or otherwise do business with Marijuana Establishments

Programs

PHy has developed specific programs to effectuate its stated goals to promote diversity and equity in its operations, which will include the following:

1. Participating in at least 2 career fairs per year in underrepresented and minority communities;
2. Creating a Diversity Committee made up of a diverse section of PHy staff committed to implementing the Plan and advancing the idea of diversity among PHy staff;
3. Working directly with staffing agencies to identify qualified candidates for open job positions who are from the above-listed diverse populations with the goal of maintaining a staff comprised of at least 25% women;
4. Working directly with staffing agencies to identify qualified candidates for open job positions who are from the above-listed diverse populations with the goal of maintaining a staff comprised of at least 25% minorities;
5. Working with staffing agencies to identify qualified candidates for open job positions to create a staff comprised of 5% Veterans;
6. Working directly with staffing agencies to identify qualified candidates for open job positions with the goal of maintaining a staff comprised of at least 5% members of the LGBTQ community;

7. Working directly with staffing agencies to identify qualified candidates for open job positions with the goal of maintaining a staff comprised of at least 5% those with a disability; and
8. Utilizing the Massachusetts Supplier Diversity Office's Directory of Certified Businesses to ensure diverse organization vendor and contractor spending at or above 25% of total related expenses.

Measurements

The General Manager, in coordination with the PHy's Diversity Committee and the Human Resources Manager, will administer the Plan and will be responsible for developing measurable outcomes to ensure PHy continues to meet its commitments. Such measurable outcomes, in accordance with PHy's goals and programs described above, include:

- Documenting the number of career fairs participated in (at least 2) in underrepresented and minority communities, including documentation of all resumes and applications received as a result of such career fairs;
- Ensuring that at least 25% of staff are comprised of women through a quarterly staffing analysis, as well as documentation of all such applicants received and identified through staffing agencies;
- Ensuring that 25% of staff are comprised of minorities through a quarterly staffing analysis, as well as documentation of all such applicants received and identified through staffing agencies;
- Ensuring that at least 5% of staff are comprised of Veterans through a quarterly staffing analysis, as well as documentation of all such applicants received and identified through staffing agencies;
- Ensuring that at least 5% of staff are comprised of those from the LGBTQ community through a quarterly staffing analysis, as well as documentation of all such applicants received and identified through staffing agencies;
- Ensuring that at least 5% of staff are those with a disability through a quarterly staffing analysis, as well as documentation of all such applicants received and identified through staffing agencies; and
- Documenting all contracts that PHy holds with diverse vendors, including the value of any such contracts and an accounting that establishes that diverse vendor spending is at or above 25% of total related expenses

Beginning upon receipt of PHy's first "Commence Operations" designation from the Commission to operate a marijuana establishment in the Commonwealth, PHy will utilize the proposed measurements to assess its Plan and will account for demonstrating proof of success or progress of the Plan upon the yearly renewal of the license. The General Manager will review and evaluate PHy's measurable outcomes no less than quarterly to ensure that PHy is meeting its

commitments. PHy is mindful that demonstration of the Plan's progress and success will be submitted to the Commission upon renewal.

PHy's Diversity Committee will also serve in an advisory role to the General Manager, and the General Manager will submit quarterly reports to the Diversity Committee relative to the metrics and effectiveness of the Plan. The initial members of the Committee were selected based on their diverse status and their personal commitments to diversity. Initial Members of the Committee are Brian Lynch, Valerie Callahan, Anthony Clark, Elizabeth Skinsacos and Ryan Checchi. Additional members of the Committee may be added at the discretion of PHy's executive management team.

Acknowledgements

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

PLAN FOR RESTRICTING ACCESS TO AGE 21 AND OLDER

Pursuant to 935 CMR 500.050(8)(b), Platinum HydroLab, Inc. (“Platinum HydroLab”) will only be accessible to individuals 21 years of age or older with a verified and valid government-issued photo ID. Upon entry into the premises of the marijuana establishment by an individual, a Platinum HydroLab agent will immediately inspect the individual’s proof of identification and determine the individual’s age, in accordance with 935 CMR 500.140(2).

In the event Platinum HydroLab discovers any of its agents intentionally or negligently sold marijuana to an individual under the age of 21, the agent will be immediately terminated, and the Commission will be promptly notified, pursuant to 935 CMR 500.105(1)(m). Platinum HydroLab will not hire any individuals who are under the age of 21 or who have been convicted of distribution of controlled substances to minors in the Commonwealth or a like violation of the laws in other jurisdictions, pursuant to 935 CMR 500.030(1).

Pursuant to 935 CMR 500.105(4), Platinum HydroLab will not engage in any marketing, advertising or branding practices that are targeted to, deemed to appeal to or portray minors under the age of 21. Platinum HydroLab will not engage in any advertising, marketing and branding by means of television, radio, internet, mobile applications, social media, or other electronic communication, billboard or other outdoor advertising, including sponsorship of charitable, sporting or similar events, unless at least 85% of the audience is reasonably expected to be 21 years of age or older as determined by reliable and current audience composition data. Platinum HydroLab will not manufacture or sell any edible products that resemble a realistic or fictional human, animal or fruit, including artistic, caricature or cartoon renderings, pursuant to 935 CMR 500.150(1)(b). In accordance with 935 CMR 500.105(4)(a)(5), any marketing, advertising and branding materials for public viewing will include a warning stating, **“For use only by adults 21 years of age or older. Keep out of the reach of children. Marijuana can impair concentration, coordination and judgment. Do not operate a vehicle or machinery under the influence of marijuana. Please Consume Responsibly.”** In accordance with 935 CMR 500.105(4)(a)(6), the additional warning is required, “This product has not been analyzed or approved by the Food and Drug Administration (FDA). There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN. There may be health risks associated with consumption of this product. Marijuana can impair concentration, coordination, and judgment. The impairment effects of Edible Marijuana Products may be delayed by two hours or more. In case of accidental ingestion, contact poison control hotline 1-800-222- 1222 or 9-1-1. This product may be illegal outside of MA.” Pursuant to 935 CMR 500.105(6)(b), Platinum HydroLab packaging for any marijuana or marijuana products will not use bright colors, resemble existing branded products, feature

cartoons or celebrities commonly used to market products to minors, feature images of minors or other words that refer to products commonly associated with minors or otherwise be attractive to minors. Platinum HydroLab's website will require all online visitors to verify they are 21 years of age or older prior to accessing the website, in accordance with 935 CMR 500.105(4)(b)(13).

QUALITY CONTROL AND TESTING

Quality Control

Platinum HydroLab, Inc. ("Platinum HydroLab") will comply with the following sanitary requirements:

1. Any Platinum HydroLab agent 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, and all edible marijuana products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000, and with the requirements for food handlers specified in 105 CMR 300.000.
2. Any Platinum HydroLab agent working in direct contact with preparation of marijuana or nonedible marijuana products will conform to sanitary practices while on duty, including:
 - a. Maintaining adequate personal cleanliness; and
 - b. 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.
3. Platinum HydroLab's hand-washing facilities will be adequate and convenient and will be furnished with running water at a suitable temperature. Hand-washing facilities will be located in Platinum HydroLab's production areas and where good sanitary practices require employees to wash and sanitize their hands, and will provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
4. Platinum HydroLab's facility will have sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. Platinum HydroLab will ensure that litter and waste is properly removed and disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal will be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
6. Platinum HydroLab's floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair;
7. Platinum HydroLab's facility will have adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. Platinum HydroLab's buildings, fixtures, and other physical facilities will be maintained in a sanitary condition;
9. Platinum HydroLab will ensure that all contact surfaces, including utensils and equipment, will be maintained in a clean and sanitary condition. Such surfaces will be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils will be so designed and of such material and workmanship as to be adequately cleanable;

10. All toxic items will be identified, held, and stored in a manner that protects against contamination of marijuana products. Toxic items will not be stored in an area containing products used in the cultivation of marijuana. Platinum HydroLab acknowledges and understands that the Commission may require Platinum HydroLab to demonstrate the intended and actual use of any toxic items found on Platinum HydroLab's premises;
11. Platinum HydroLab will ensure that its water supply is sufficient for necessary operations, and that any private water source will be capable of providing a safe, potable, and adequate supply of water to meet Platinum HydroLab's needs;
12. Platinum HydroLab's plumbing will be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the marijuana establishment. Plumbing will properly convey sewage and liquid disposable waste from the marijuana establishment. There will be no cross-connections between the potable and wastewater lines;
13. Platinum HydroLab will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
14. Platinum HydroLab will hold all products that can support the rapid growth of undesirable microorganisms in a manner that prevents the growth of these microorganisms; and
15. Platinum HydroLab will store and transport finished products under conditions that will protect them against physical, chemical, and microbial contamination, as well as against deterioration of finished products or their containers.

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

Platinum HydroLab will ensure that Platinum HydroLab's facility is always maintained in a sanitary fashion and will comply with all applicable sanitary requirements.

Platinum HydroLab will follow established policies and procedures for handling voluntary and mandatory recalls of marijuana products. Such procedures are sufficient to deal with recalls due to any action initiated at the request or order of the Commission, and any voluntary action by Platinum HydroLab to remove defective or potentially defective marijuana products from the market, as well as any action undertaken to promote public health and safety.

Any inventory that becomes outdated, spoiled, damaged, deteriorated, mislabeled, or contaminated will be disposed of in accordance with the provisions of 935 CMR 500.105(12),

and any such waste will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations.

Platinum HydroLab will process marijuana in a safe and sanitary manner. Platinum HydroLab will process the leaves and flowers of the female marijuana plant only, which will be:

- Well-cured and generally free of seeds and stems;
- Free of dirt, sand, debris, and other foreign matter;
- Free of contamination by mold, rot, other fungus, and bacterial diseases;
- Prepared and handled on food-grade stainless steel tables; and
- Packaged in a secure area.

All edible products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: Minimum Sanitation Standards for Food Establishments, and any marijuana product that is made to resemble a typical food or beverage product will be packaged and labeled as required by 935 CMR 500.105(5) and 500.105(6).

When selling or otherwise transferring marijuana to another marijuana establishment Platinum HydroLab will provide documentation of its compliance with the testing requirements of 935 CMR 500.160: *Testing of Marijuana and Marijuana Products*, and standards established by the Commission for the conditions, including time and temperature controls, necessary to protect marijuana products against physical, chemical, and microbial contamination as well as against deterioration of finished products during storage and transportation.

Testing

Platinum HydroLab will not sell or otherwise market marijuana or marijuana products that are not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. No marijuana product will be sold or otherwise marketed for adult use that has not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160.

Any Independent Testing Laboratory relied upon by Platinum HydroLab for testing will be licensed or registered by the Commission and (i) currently and validly licensed under 935 CMR 500.101: *Application Requirements*, or formerly and validly registered by the Commission; (ii) accredited to ISO 17025:2017 or the most current International Organization for Standardization 17025 by a third-party accrediting body that is a signatory to the International Laboratory Accreditation Accrediting Cooperation mutual recognition arrangement or that is otherwise approved by the Commission; (iii) independent financially from any Medical Marijuana Treatment Center, Marijuana Establishment or Licensee; and (iv) qualified to test marijuana and marijuana products, including marijuana-infused products, in compliance with M.G.L. c. 94C, §

34; M.G.L c. 94G, § 15; 935 CMR 500.000: *Adult Use of Marijuana*; 935 CMR 501.000: *Medical Use of Marijuana*; and Commission protocol(s).

Testing of Platinum HydroLab's marijuana products will be performed by an Independent Testing Laboratory in compliance with a protocol(s) established in accordance with M.G.L. c. 94G, § 15 and in a form and manner determined by the Commission, including but not limited to, the *Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products*. Testing of Platinum HydroLab's environmental media will be performed in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries* published by the Commission.

Platinum HydroLab's marijuana will be tested for the cannabinoid profile and for contaminants as specified by the Commission including, but not limited to, mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides. Platinum HydroLab acknowledges and understands that the Commission may require additional testing.

Platinum HydroLab's policy of responding to laboratory results that indicate contaminant levels are above acceptable limits established in the protocols identified in 935 CMR 500.160(1) will include notifying the Commission (i) within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch and (ii) of any information regarding contamination as specified by the Commission immediately upon request by the Commission. Such notification will be from both Platinum HydroLab and the Independent Testing Laboratory, separately and directly, and will describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

Platinum HydroLab will maintain testing results in compliance with 935 CMR 500.000 *et seq* and the record keeping policies described herein and will maintain the results of all testing for no less than one year. Platinum HydroLab acknowledges and understands that testing results will be valid for a period of one year, and that marijuana or marijuana products with testing dates in excess of one year shall be deemed expired and may not be dispensed, sold, transferred or otherwise conveyed until retested.

All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services will comply with 935 CMR 500.105(13). All storage of Platinum HydroLab's marijuana at a laboratory providing marijuana testing services will comply with 935 CMR 500.105(11). All excess marijuana will be disposed in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to Platinum HydroLab for disposal or by the Independent Testing Laboratory disposing of it directly. All Single-servings of marijuana products will be tested for potency in accordance with

935 CMR 500.150(4)(a) and subject to a potency variance of no greater than plus/minus ten percent (+/- 10%). Any marijuana or marijuana products submitted for retesting prior to remediation will be submitted to an Independent Testing Laboratory other than the laboratory which provided the initial failed result. Marijuana submitted for retesting after documented remediation may be submitted to the same Independent Testing Laboratory that produced the initial failed testing result prior to remediation.

PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS

Platinum HydroLab, Inc. (“Platinum HydroLab”) will securely maintain personnel records, including registration status and background check records. Platinum HydroLab will keep, at a minimum, the following 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;
- A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
- Personnel policies and procedures; and
- All background check reports obtained in accordance with 935 CMR 500.030.

Agent Personnel Records

In compliance with 935 CMR 500.105(9), personnel records for each agent will be maintained for at least twelve (12) months after termination of the agent’s affiliation with Platinum HydroLab and will include, at a minimum, the following:

- All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
- Documentation of verification of references;
- The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
- Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
- Documentation of periodic performance evaluations;
- A record of any disciplinary action taken;
- Notice of completed responsible vendor and eight-hour related duty training; and
- Results of initial background investigation, including CORI reports.

Personnel records will be kept in a secure location to maintain confidentiality and be only accessible to the agent’s manager or members of the executive management team.

Agent Background Checks

- In addition to completing the Commission’s agent registration process, all agents hired to work for Platinum HydroLab will undergo a detailed background investigation prior to being granted access to a Platinum HydroLab facility or beginning work duties.
- Background checks will be conducted on all agents in their capacity as employees or volunteers for Platinum HydroLab pursuant to 935 CMR 500.030 and will be used by the Director of Security, who will be registered with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: iCORI Registration and the Commission for purposes of determining the suitability of individuals for registration as a marijuana establishment agent with the licensee.

- For purposes of determining suitability based on background checks performed in accordance with 935 CMR 500.030, Platinum HydroLab will consider:
 - a. All conditions, offenses, and violations are construed to include Massachusetts law or like or similar law(s) of another state, the United States or foreign jurisdiction, a military, territorial or Native American tribal authority, or any other jurisdiction.
 - b. All criminal disqualifying conditions, offenses, and violations include the crimes of attempt, accessory, conspiracy, and solicitation. Juvenile dispositions will not be considered as a factor for determining suitability.
 - c. Where applicable, all look-back periods for criminal conditions, offenses, and violations included in 935 CMR 500.802 commence upon the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look-back period will commence upon release from incarceration.
- Suitability determinations will be made in accordance with the procedures set forth in 935 CMR 500.800. In addition to the requirements established in 935 CMR 500.800, Platinum HydroLab will:
 - a. Comply with all guidance provided by the Commission and 935 CMR 500.802: Tables B through D to determine if the results of the background are grounds for Mandatory Disqualification or Presumptive Negative Suitability Determination.
 - b. Consider whether offense(s) or information that would result in a Presumptive Negative Suitability Determination under 935 CMR 500.802. In the event a Presumptive Negative Suitability Determination is made, Platinum HydroLab will consider the following factors:
 - i. Time since the offense or incident;
 - ii. Age of the subject at the time of the offense or incident;
 - iii. Nature and specific circumstances of the offense or incident;
 - iv. Sentence imposed and length, if any, of incarceration, if criminal;
 - v. Penalty or discipline imposed, including damages awarded, if civil or administrative;
 - vi. Relationship of offense or incident to nature of work to be performed;
 - vii. Number of offenses or incidents;
 - viii. Whether offenses or incidents were committed in association with dependence on drugs or alcohol from which the subject has since recovered;
 - ix. If criminal, any relevant evidence of rehabilitation or lack thereof, such as information about compliance with conditions of parole or probation, including orders of no contact with victims and witnesses, and the subject's conduct and experience since the time of the offense including, but not limited to, professional or educational certifications obtained; and
 - x. Any other relevant information, including information submitted by the subject.
 - c. Consider appeals of determinations of unsuitability based on claims of erroneous information received as part of the background check during the application process in accordance with 803 CMR 2.17: Requirement to Maintain a Secondary

Dissemination Log and 2.18: Adverse Employment Decision Based on CORI or Other Types of Criminal History Information Received from a Source Other than the DCJIS.

- All suitability determinations will be documented in compliance with all requirements set forth in 935 CMR 500 et seq. and guidance provided by the Commission.
- Background screening will be conducted by an investigative firm holding the National Association of Professional Background Screeners (NAPBS®) Background Screening Credentialing Council (BSCC) accreditation and capable of performing the searches required by the regulations and guidance provided by the Commission.
- References provided by the agent will be verified at the time of hire.
- As a condition of their continued employment, agents, volunteers, contractors, and subcontractors are required to renew their Program ID cards annually and submit to other background screening as may be required by Platinum HydroLab or the Commission.

Personnel Policies and Training

As outlined in Platinum HydroLab's Record Keeping Procedures, a staffing plan and staffing records will be maintained in compliance with 935 CMR 500.105(9) and will be made available to the Commission, upon request. All Platinum HydroLab agents are required to complete training as detailed in Platinum HydroLab's Qualifications and Training plan which includes but is not limited to the Platinum HydroLab's strict alcohol, smoke and drug-free workplace policy, job specific training, Responsible Vendor Training Program, confidentiality training including how confidential information is maintained at the marijuana establishment and a comprehensive discussion regarding the marijuana establishment's policy for immediate dismissal. All training will be documented in accordance with 935 CMR 105(9)(d)(2)(d).

Platinum HydroLab will have a policy for the immediate dismissal of any agent who has:

- Diverted marijuana, which will be reported the Police Department and to the Commission;
- Engaged in unsafe practices with regard to Platinum HydroLab operations, which will be reported to the Commission; or
- 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.

RECORDKEEPING PROCEDURES

Platinum HydroLab, Inc. (“Platinum HydroLab”) has established policies regarding recordkeeping and record-retention in order to ensure the maintenance, safe keeping, and accessibility of critical documents. Electronic and wet signatures are accepted forms of execution of Platinum HydroLab documents. Records will be stored at Platinum HydroLab in a locked room designated for record retention. All written records will be available for inspection by the Commission upon request.

Recordkeeping

To ensure that Platinum HydroLab is keeping and retaining all records as noted in this policy, reviewing Corporate Records, Business Records, and Personnel Records to ensure completeness, accuracy, and timeliness of such documents will occur as part of Platinum HydroLab’s quarter-end closing procedures. In addition, Platinum HydroLab’s operating procedures will be updated on an ongoing basis as needed and undergo a review by the executive management team on an annual basis.

- **Corporate Records**: are defined as those records that require, at a minimum, annual reviews, updates, and renewals, including:
 - Insurance Coverage:
 - Directors & Officers Policy
 - Product Liability Policy
 - General Liability Policy
 - Umbrella Policy
 - Workers Compensation Policy
 - Employer Professional Liability Policy
 - Third-Party Laboratory Contracts
 - Commission Requirements:
 - Annual Agent Registration
 - Annual Marijuana Establishment Registration
 - Local Compliance:
 - Certificate of Occupancy
 - Special Permits
 - Variances
 - Site Plan Approvals
 - As-Built Drawings
 - Corporate Governance:
 - Annual Report
 - Secretary of Commonwealth Filings

- Business Records: Records that require ongoing maintenance and updates. These records can be electronic or hard copy (preferably electronic) and at minimum include:
 - Assets and liabilities;
 - Monetary transactions;
 - Books of accounts, which will 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, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over Platinum HydroLab.
- Personnel Records: At a minimum will include:
 - Job descriptions for each agent and volunteer position, as well as organizational charts consistent with the job descriptions;
 - A personnel record for each marijuana establishment agent. Such records will be maintained for at least twelve (12) months after termination of the agent's affiliation with Platinum HydroLab and will include, at a minimum, the following:
 - All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
 - Documentation of verification of references;
 - The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
 - Documentation of periodic performance evaluations; and
 - A record of any disciplinary action taken.
 - Notice of completed responsible vendor and eight-hour related duty training.
 - A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
 - Personnel policies and procedures; and
 - All background check reports obtained in accordance with [M.G.L c. 6 § 172, 935 CMR 500.029: Registration of Independent Testing Laboratory Agents], 935 CMR 500.030: Registration of Marijuana Establishment Agents 803 CMR 2.00: Criminal Offender Record Information (CORI).

- Handling and Testing of Marijuana Records
 - Platinum HydroLab will maintain the results of all testing for a minimum of one (1) year.
- Inventory Records
 - The record of each inventory will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the agents who conducted the inventory.
- Seed-to-Sale Tracking Records
 - Platinum HydroLab will use seed-to-sale tracking software to maintain real-time inventory. The seed-to-sale tracking software inventory reporting will meet the requirements specified by the Commission and 935 CMR 500.105(8)(e), including, at a minimum, an inventory of marijuana plants; marijuana plant-seeds and clones in any phase of development such as propagation, vegetation, flowering; marijuana ready for dispensing; all marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.
- Incident Reporting Records
 - Within ten (10) calendar days, Platinum HydroLab will provide notice to the Commission of any incident described in 935 CMR 500.110(9)(a), by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified within twenty-four (24) hours of discovering the breach or incident; and
 - All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(9)(a) will be maintained by Platinum HydroLab for no less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities within Platinum HydroLab's jurisdiction on request.
- Visitor Records
 - A visitor sign-in and sign-out log will be maintained at the security office. The log will include the visitor's name, address, organization or firm, date, time in and out, and the name of the authorized agent who will be escorting the visitor.
- Waste Disposal Records
 - When marijuana or marijuana products are disposed of, Platinum HydroLab will create and maintain an electronic record of the date, the type and quantity disposed of or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two Platinum HydroLab agents present during the disposal or other handling, with their signatures. Platinum HydroLab will keep disposal records for at least three (3) years. This period will

automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.

- Security Records

- A current list of authorized agents and service personnel that have access to the surveillance room will be available to the Commission upon request;
- Recordings from all video cameras which shall be enabled to record twenty-four (24) hours each day shall be available for immediate viewing by the Commission on request for at least the preceding ninety (90) calendar days or the duration of a request to preserve the recordings for a specified period of time made by the Commission, whichever is longer; and
- Recordings shall not be destroyed or altered and shall be retained as long as necessary if Platinum HydroLab is aware of pending criminal, civil or administrative investigation or legal proceeding for which the recording may contain relevant information.

- Transportation Records

- Platinum HydroLab will retain all transportation manifests for a minimum of one (1) year and make them available to the Commission upon request.

- Vehicle Records

- Records that the Platinum HydroLab's vehicle is properly registered, inspected, and insured in the Commonwealth and shall be made available to the Commission on request.

- Agent Training Records

- Documentation of all required training, including training regarding privacy and confidentiality requirements, and a signed statement of the individual indicating the date, time, and place he or she received the training, the topics discussed and the name and title of the presenter(s).

- Responsible Vendor Training

- Platinum HydroLab will maintain records of Responsible Vendor Training Program compliance for four (4) years and make them available to inspection by the Commission and any other applicable licensing authority on request during normal business hours.

- Closure

- In the event Platinum HydroLab closes, all records will be kept for at least two (2) years at Platinum HydroLab's expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission. In addition, Platinum HydroLab will communicate with the Commission during the closure process and accommodate any additional requests the Commission or other agencies may have.

- Written Operating Policies and Procedures: Policies and Procedures related to Platinum HydroLab's operations will be updated on an ongoing basis as needed and undergo a review by the executive management team on an annual basis. Policies and Procedures will include the following:
 - Security measures in compliance with 935 CMR 500.110;
 - Employee security policies, including personal safety and crime prevention techniques;
 - A description of Platinum HydroLab's hours of operation and after-hours contact information, which will be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
 - Storage of marijuana in compliance with 935 CMR 500.105(11);
 - Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold;
 - Price list for Marijuana and Marijuana Products, and alternate price lists for patients with documented Verified Financial Hardship as defined in 501.002: *Definitions*, as required by 935 CMR 501.100(1)(f);
 - Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);
 - Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
 - A staffing plan and staffing records in compliance with 935 CMR 500.105(9)(d);
 - Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
 - Alcohol, smoke, and drug-free workplace policies;
 - A plan describing how confidential information will be maintained;
 - Policy for the immediate dismissal of any dispensary agent who has:
 - Diverted marijuana, which will be reported to Law Enforcement Authorities and to the Commission;
 - Engaged in unsafe practices with regard to Platinum HydroLab operations, which will be reported to the Commission; or
 - 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.
 - A list of all board of directors, members, and executives of Platinum HydroLab, and members, if any, of the licensee must be made available upon request by any individual. This requirement may be fulfilled by placing this information on Platinum HydroLab's website.

- Policies and procedures for the handling of cash on Platinum HydroLab premises including but not limited to storage, collection frequency and transport to financial institution(s), to be available upon inspection.
- Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.
- Policies and procedures for energy efficiency and conservation that will include:
 - Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;
 - Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on site, and an explanation of why the identified opportunities were not pursued, if applicable;
 - Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
 - Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25 § 21, or through municipal lighting plants.
- Policies and procedures to promote workplace safety consistent with applicable standards set by the Occupational Safety and Health Administration, including plans to identify and address any biological, chemical or physical hazards. Such policies and procedures shall include, at a minimum, a hazard communication plan, personal protective equipment assessment, a fire protection plan, and an emergency action plan.
- Application Renewal Records
 - Platinum HydroLab will keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the establishment, which would include the city's or town's anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of Platinum HydroLab will be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

Record-Retention

Platinum HydroLab will meet Commission recordkeeping requirements and retain a copy of all records for two (2) years, unless otherwise specified in the regulations.

MAINTAINING OF FINANCIAL RECORDS

Platinum HydroLab, Inc.'s ("Platinum HydroLab") operating policies and procedures ensure financial records are accurate and maintained in compliance with the Commission's Adult Use of Marijuana regulations (935 CMR 500). Financial records maintenance measures include policies and procedures requiring that:

- Confidential information will be maintained in a secure location, kept separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the Commission may access this information to carry out its official duties.
- All recordkeeping requirements under 935 CMR 500.105(9) are followed, including:
 - Keeping written business records, available for inspection, and in accordance with generally accepted accounting principles, which will include manual or computerized records of:
 - Assets and liabilities;
 - Monetary transactions;
 - Books of accounts, which will 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, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over the Platinum HydroLab.
- All sales recording requirements under 935 CMR 500.140(5) are followed, including:
 - Utilizing a point-of-sale (POS) system approved by the Commission, in consultation with the DOR, and a sales recording module approved by DOR;
 - Conducting a monthly analysis of its equipment and sales date, and maintaining records, available to the Commission upon request, that the monthly analysis has been performed;
 - Complying with 830 CMR 62C.25.1: *Record Retention* and DOR Directive 16-1 regarding recordkeeping requirements; and
 - Maintaining such records that would allow for the Commission and the DOR to audit and examine the point-of-sale system used in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.
- Additional written business records will be kept, including, but not limited to, records of:
 - Compliance with liability insurance coverage or maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16);

- Fees paid under 935 CMR 500.005 or any other section of the Commission's regulations; and
 - Fines or penalties, if any, paid under 935 CMR 500.360 or any other section of the Commission's regulations.
- Application Renewal Records
 - Platinum HydroLab will keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the establishment, which would include the city's or town's anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of Platinum HydroLab will be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

QUALIFICATIONS AND TRAINING

Platinum HydroLab, Inc. (“Platinum HydroLab”) will ensure that all employees hired to work at a Platinum HydroLab facility will be qualified to work as a marijuana establishment agent and properly trained to serve in their respective roles in a compliant manner.

Qualifications

In accordance with 935 CMR 500.030, a candidate for employment as a marijuana establishment agent must be 21 years of age or older. In addition, the candidate cannot have been convicted of a criminal offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States, or foreign jurisdiction, or a military, territorial, or Native American tribal authority.

Platinum HydroLab will also ensure that its employees are suitable for registration consistent with the provisions of 935 CMR 500.802. In the event that Platinum HydroLab discovers any of its agents are not suitable for registration as a marijuana establishment agent, the agent’s employment will be terminated, and Platinum HydroLab will notify the Commission within one (1) business day that the agent is no longer associated with the establishment.

Training

As required by 935 CMR 500.105(2), and prior to performing job functions, each of Platinum HydroLab’s agents will successfully complete a comprehensive training program that is tailored to the roles and responsibilities of the agent’s job function. Agent training will at least include the Responsible Vendor Training Program and eight (8) hours of on-going training annually.

All of Platinum HydroLab’s current Owners, managers, and employees that are involved in the handling and sale of marijuana at the time of licensure or renewal of licensure will have attended and successfully completed the mandatory Responsible Vendor Training Program operated by an education provider accredited by the Commission to provide the annual minimum of three (3) hours of required training to marijuana establishment agents to be designated a “Responsible Vendor”. Once Platinum HydroLab is designated a “Responsible Vendor”, all new employees involved in the handling and sale of marijuana will successfully complete a Responsible Vendor Training Program within 90 days of the date they are hired. After initial successful completion of a Response Vendor Training Program, each Owner, manager, and employee involved in the handling and sale of marijuana will successfully complete the program once every year thereafter to maintain designation as a “Responsible Vendor”.

Platinum HydroLab will also encourage administrative employees who do not handle or sell marijuana to take the “Responsible Vendor” program on a voluntary basis to help ensure compliance. Platinum HydroLab’s records of Responsible Vendor Training Program compliance

will be maintained for at least four (4) years and made available during normal business hours for inspection by the Commission and any other applicable licensing authority on request.

As part of the Responsible Vendor Training Program, Platinum HydroLab's agents will receive training on a variety of topics relevant to marijuana establishment operations, including but not limited to the following:

1. Marijuana's effect on the human body, including:
 - Scientifically based evidence on the physical and mental health effects based on the type of Marijuana Product;
 - The amount of time to feel impairment;
 - Visible signs of impairment; and
 - Recognizing signs of impairment
2. Diversion prevention and prevention of sales to minors, including best practices;
3. Compliance with all tracking requirements;
4. Acceptable forms of identification, including:
 - How to check identification;
 - Spotting false identification;
 - Patient registration cards formerly and validly issued by the DPH or currently and validly issued by the Commission; and
 - Common mistakes made in verification
5. Other key state laws and r
6. ules affecting Owners, managers, and employees, including:
 - Local and state licensing and enforcement;
 - Incident and notification requirements;
 - Administrative and criminal liability;
 - License sanctions;
 - Waste disposal;
 - Health and safety standards;
 - Patrons prohibited from bringing marijuana onto licensed premises;
 - Permitted hours of sale;
 - Conduct of establishment;
 - Permitting inspections by state and local licensing and enforcement authorities;
 - Licensee responsibilities for activities occurring within licensed premises;
 - Maintenance of records;
 - Privacy issues; and
 - Prohibited purchases and practices.

PLATINUM HYDROLAB, INC.

LOWELL ENERGY COMPLIANCE PLAN

Platinum HydroLab, Inc. (“Platinum HydroLab”) has developed the following Energy Compliance Plan to ensure that its Product Manufacturer facility located in Lowell remains in compliance with the energy efficiency and conservation regulations codified in 935 CMR 500.103(1)(b), 500.105(1)(q), 500.105(15) and 500.120(11).

Potential Energy-Use Reduction Opportunities

Platinum HydroLab is considering the following potential opportunities for energy-use reduction and plans for implementation of such opportunities.

1. Facility is fully designed with features including state-of-the-art spray foam insulation
2. Energy efficient lighting with motion sensors
3. Lighting schedule program utilizing off peak hours to reduce the total grid demand

As the need and opportunity for facility upgrades and maintenance arise in the future and the company becomes cash flow positive, Platinum HydroLab will continue to evaluate energy-use reduction opportunities.

Renewable Energy Generation Opportunities

Platinum HydroLab does not currently plan to utilize renewable energy generation for its facility. However, as the need and opportunity for facility upgrades and maintenance arise in the future and the company becomes cash flow positive, Platinum HydroLab will continue to evaluate opportunities for renewable energy generation.

Strategies to Reduce Electric Demand

Platinum HydroLab is considering the following strategies to reduce electric demand.

4. Facility is fully designed with features including state-of-the-art spray foam insulation
5. Energy efficient lighting with motion sensors
6. Lighting schedule program utilizing off peak hours to reduce the total grid demand

Platinum HydroLab is working with h Fluence Bioengineering to create an energy efficient lighting plan and plans on use Fluence SPYDR2i - LED Lighting Fixture throughout the growing areas of the building. As the need and opportunity for facility upgrades and maintenance arise in the future and the company becomes cash flow positive, Platinum HydroLab will continue to evaluate strategies to reduce electric demand.

Opportunities for Engagement with Energy Efficiency Programs

Platinum HydroLab plans on engaging with the energy efficiency program offered by National Grid and Mass Save and will coordinate with Lowell officials to identify other potential energy saving programs and initiatives.

PRODUCT MANUFACTURING SAFETY PLAN

In accordance with 935 CMR 500.105(3)(c), Platinum HydroLab, Inc. (“Platinum HydroLab”) will ensure that all edible products will be prepared, handled and stored in compliance with the sanitation requirements in 105 CMR 590.000: *State sanitary code chapter X: Minimum Sanitation Standards for Food Establishments*.

Agent Hygiene Practices

Platinum HydroLab agents will follow thorough hygienic practices and will maintain adequate personal cleanliness. All Platinum HydroLab agents will wash their hands thoroughly before starting work, and at any other time when hands may have become soiled or contaminated. Hand-washing facilities will be placed conveniently within the Platinum HydroLab facility and will be equipped with running water, effective hand-cleaning and sanitizing preparations, suitable drying devices, and sufficient storage for all cleaning and sanitation materials. All Platinum HydroLab agents will also wear food grade disposable gloves when handling marijuana and in the creation of marijuana products.

Any agent who, by medical examination or supervisory observation, is shown to have, or appears to have, an illness, open lesion (e.g., boils, sores, infected wounds), or any other abnormal source of microbial contamination for which there is a reasonable possibility of contact with cannabis shall be excluded from any operations that may be expected to result in microbial contamination until the condition is corrected.

Food Material Practices

Food material used in the preparation of marijuana products will be acquired from an approved source. Any and all materials used in the production of marijuana products that can support the rapid growth of undesirable microorganisms will be stored in a manner that prevents the growth of such microorganisms, such as proper refrigeration or other appropriate storage. All thermometers used in the storage and preparation of marijuana products will be tested regularly to ensure accuracy. All food products will be properly stored in their original containers and will be properly labeled. Only approved food additives will be used. Marijuana products and food products used in the production of marijuana products will be maintained in good condition and will be unadulterated.

Food Contact Surface Sanitation Practices

The Company recognizes the importance of properly washing, rinsing, and sanitizing food preparation equipment, utensils, and all surfaces that come into contact with food to reduce the number of bacteria, prevent the spread of bacteria, and eliminate the possibility of cross-contamination. Platinum HydroLab will institute the following sanitation procedures in its commercial kitchen:

- Sanitizing solution should be used in the kitchen and other areas to sanitize food contact surfaces and utensils prior to use.
- All surfaces that come into contact with food will be washed, rinsed, and sanitized after each use, when an agent begins working with another type of food, anytime an agent is interrupted during a task and the tools or items they have been working with may have become contaminated, or at four-hour intervals if the areas or items are in constant use.

- Sanitizing solution will be stored in buckets or other containers such as a spray bottle and used with wiping cloths to sanitize prep tables, prep sinks, dining room tables, bar area, and working utensils; in the third compartment of a 3-compartment sink to sanitize all dishes that are washed; and use the final rinse in the dish machine to sanitize all dishes that are washed.
 - The chlorine-based solution will be prepared each morning, using the following recipe:

Minimum concentration: 50ppm Range recommended: 50-100ppm. Do not exceed 200 ppm.	Amount needed per unit of water		
	per 2 quarts	per gallon	per 12 gallons
Use provided test strips. Check the temperature of the water for recommend temperature of 75-120 degrees Fahrenheit.	½ tsp.	1 tsp.	1/4 cup

- The sanitizing solution will be measured, tested, and placed into red sanitization bins and used to wipe down surfaces that will then air-dry.
 - The third bay in the bay sinks will be filled with the solution, in order to soak utensils, cookware and labware, for a minimum of one (1) minute, and will air-dry.
- Agents will ensure that all wiping cloths are soaked with sanitizer when cleaning food contact surfaces (like cutting boards, prep tables, slicers, etc.) and stored in sanitizer when not in use.
- Sanitizer buckets will be set up at all times in areas where food is being handled. Agents will check sanitizer solutions frequently to ensure that they are at the correct concentration, using the proper test strips for the type of sanitizing chemical that they are using.
- Sanitizer solutions will be changed as needed to properly sanitize food contact surfaces.
- Cleaning of all equipment, work surfaces, laboratory glassware and kitchen cookware can be challenging given the non-aqueous nature of cannabis concentrate. Often, strong solvents such as acetone must be used to chemically dissolve hard-to-clean cannabis concentrate. When acetone is used to clean surfaces, a solvent respirator must be worn to

prevent inhalation of fumes. When acetone is used to clean lab glass and utensils, soaking must be done under the fume hood located in the Platinum HydroLab facility, at all times. Used solvent will be disposed of in the provided solvent-waste bin, which is only to be removed by a chemical waste disposal professional.

- Equipment and utensils utilized in the Platinum HydroLab facility be so designed and of such material and workmanship as to be adequately cleanable.

Training

All agents will complete mandatory safety training sessions. Platinum HydroLab agents and Platinum HydroLab management will have the following responsibilities when it comes to health and safety:

- **Platinum HydroLab Management:**
 - Ensure the health and safety of all agents.
 - Correct any workplace conditions that are hazardous to the health and safety of agents.
 - Inform agents about any remaining hazards.
 - Make copies of the OSHA Regulations and any workers compensation requirements available by posting throughout the facility.
 - Ensure agents know their rights and responsibilities under OSHA Regulations and the Commission's requirements and that they comply with them.
 - Provide and maintain protective devices, equipment, and clothing, and ensure that agents use them.
 - Provide agents with education, supervision, and training specific to equipment.
 - Perform ongoing reviews and updates to policies and procedures as needed.
- **Platinum HydroLab Agents:**
 - Take care to protect health and safety and the health and safety of others who may be affected by individual actions.
 - Comply with all regulations and other legal requirements.
 - Follow established safe work procedures.
 - Use the required personal protective equipment.
 - Refrain from horseplay or similar conduct that may endanger others.
 - Ensure individual ability to work safely is not impaired by drugs or alcohol.
 - Report accidents and other incidents (including near misses) to the manager on duty.
 - Report the following to the manager on duty:
 - A hazard that might endanger Platinum HydroLab agents;
 - A problem with personal protective equipment or clothing; or
 - Any suggestions to improve workplace safety.

Cleanliness & Sanitation Training:

Platinum HydroLab will combine its existing successful agent training program, supplemented with Commission rules and cannabis specific training to provide exhaustive training curricula to all agents. Platinum HydroLabs's training will include USDA Good Handling Practices and Quality Systems, FDA Current Good Manufacturing Practices, and sickness or illness policies. Agents who handle cannabis will receive hygiene training with specific attention to preventing

microbial contamination. All employees will receive, at a minimum, the following quality assurance and contamination prevention training:

- USDA Good Handling Practices and Quality Systems, including but not limited to 21 CFR part 110.
- Product care, inspection, and maintenance techniques.
- Company policies which prohibit employees showing signs of illness, open wounds, sores, or skin infections from handling cannabis or materials that come into contact with cannabis.
- Hygiene training for employees who handle cannabis with specific attention to preventing microbial contamination.
- Handwashing requirements, including washing hands with soap and hot water before beginning work, after using the bathroom, and after meal breaks.
- Quality assurance procedures and consequences of failing to follow the company's established processes; and
- ServSafe certification training.

Platinum HydroLab Lab and Production Agent Health and Safety Program

Platinum HydroLab has identified eight basic components which have been identified to help prevent accidents and injuries from happening in the Platinum HydroLab facility, as well as to help deal effectively with any incidents that do occur. These components are:

- Hazard Identification & Risk Control—determine which hazards are present in the workplace and take steps to eliminate or minimize such hazard.
- Safe Work Procedures:
 - Dealing with wet surfaces;
 - Wearing proper personal protective equipment and clothing;
 - Handling solvents with use of protective gloves and proper ventilation; and
 - Using proper body mechanics when lifting heavy objects.
- Orientation, Education, Training & Supervision—properly prepare agents for job duties and ensure policies and procedures are consistently followed.
- Safety Inspections—regular safety inspections throughout the Platinum HydroLab facility, which will help identify workplace hazards so that they can be eliminated or controlled.
- Incident Investigation—determine cause of accident or injury and implement preventive measures.
- Health and Safety Meetings—regular meetings to provide an opportunity for agents and managers to communicate any concerns about health and safety.
- First Aid—determine what level of first aid is necessary on-site.
- Records & Statistics—maintain documentation to help identify recurring problems and ensure that hazardous conditions are corrected.

An annual Health and Safety Program review will be carried out to address current concerns.

When selling or otherwise transferring marijuana to another marijuana establishment Platinum HydroLab will provide documentation of its compliance with the testing requirements of 935 CMR 500.160: *Testing of Marijuana and Marijuana Products*, and standards established by the Commission for the conditions, including time and temperature controls, necessary to protect

marijuana products against physical, chemical, and microbial contamination as well as against deterioration of finished products during storage and transportation.