



Massachusetts Cannabis Control Commission

Marijuana Courier

General Information:

License Number: D0100127
Original Issued Date: 05/12/2022
Issued Date: 06/08/2023
Expiration Date: 06/12/2024

MARIJUANA COURIER PRE-CERTIFICATION NUMBER

Marijuana Courier Pre-Certification Number:

ABOUT THE MARIJUANA COURIER LICENSEE

Business Legal Name: SQ Causeway

Phone Number: 617-429-8473
Email Address: Info@causewaycannabis.com

Business Address 1: 731 Main st.
Business City: Clinton
Business State: MA
Business Zip Code: 01510
Business Address 2:
Mailing Address 1: 731 Main St.
Mailing City: Clinton
Mailing State: MA
Mailing Zip Code: 01510
Mailing Address 2:

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PERSONS HAVING DIRECT OR INDIRECT CONTROL

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 100
Role: Owner / Partner
First Name: Robert
Gender: Male
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)
Specify Race or Ethnicity:
Percentage Of Control: 100
Other Role:
Last Name: Verney
Suffix:
User Defined Gender:

ENTITIES HAVING DIRECT OR INDIRECT CONTROL

No records found

CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: Robert
Last Name: Verney
Suffix:
Types of Capital: Monetary/Equity
Other Type of Capital: Total Value of the Capital Provided: \$100
Percentage of Initial Capital: 100

Capital Attestation: Yes

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

MARIJUANA COURIER LICENSEE PROPERTY DETAILS

Establishment Address 1: 731 Main St.

Establishment Address 2:

Establishment City: Clinton

Establishment Zip Code: 01510

Approximate square footage of the establishment: 600

How many abutters does this property have?: 1

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

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan to Remain Compliant with Local Zoning	Plan to Remain Compliant with Local Zoning.pdf	pdf	61b8d9d5d4f4b84609a56d33	12/14/2021
Community Outreach Meeting Documentation	Notice to Permitting Office.jpg	jpeg	61bcc41dd3dd284475be316c	12/17/2021
Community Outreach Meeting Documentation	Community outreach attestation form.pdf	pdf	61c20a7ad4f4b84609a58fb0	12/21/2021
Certification of Host Community Agreement	HCA certification form.pdf	pdf	61c20a96073d79445b0d4b56	12/21/2021
Community Outreach Meeting Documentation	Notice to abutters C attachment.pdf	pdf	61e05412f2351e085f721e24	01/13/2022
Community Outreach Meeting Documentation	Notice to Clerk attachment B.pdf	pdf	61e0548a35cb3e08f7217a1a	01/13/2022
Community Outreach Meeting Documentation	Notice to selectmen. Attachment A.pdf	pdf	61e054d735cb3e08f7217a1e	01/13/2022
Community Outreach Meeting Documentation	Published Notice A attachment.pdf	pdf	61e0551271cb790879589688	01/13/2022

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

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	SQC Positively Impact Disproportionate Plan 2122.pdf	pdf	61f945eba828d708f051021c	02/01/2022

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Date generated: 09/05/2023

Page: 2 of 5

Role:	Other Role:
First Name: Robert	Last Name: Verney Suffix:
RMD Association: Not associated with an RMD	
Background Question: no	

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	nePkcL81Hc3Ja53K-813.pdf	pdf	6425927b50f99b0008ba21e1	03/30/2023
No Employee/DUA Certification Attestation	Employee Attestation 3 31 (1).pdf	pdf	6425bf8450e43b0008421e38	03/30/2023
Department of Revenue - Certificate of Good standing	Screenshot_20230404-125526.png	png	642c56a42c9c310008b6950f	04/04/2023

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	Certificate of Organization.pdf	pdf	61b8cf0bd2f0bb446ad23293	12/14/2021
Bylaws	SQ Causeway Bylaws.pdf	pdf	61b8cf4a073d79445b0d289c	12/14/2021

Massachusetts Business Identification Number: 001420657

Doing-Business-As Name: Causeway

DBA Registration City: Clinton

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	SQ Causeway Plan for Obtaining Liability Insurance.pdf	pdf	5f7373b78012da07a0d93f06	09/29/2020
Business Plan	SQ Causeway Business Plan.pdf	pdf	5f999cab708362084028420d	10/28/2020
Proposed Timeline	REV 4 23 Proposed Timeline SQ Causeway.pdf	pdf	6452830b0dd43c000715ee03	05/03/2023

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Inventory procedures	Inventory SOP.pdf	pdf	5f9c30206e60eb07f57f09b1	10/30/2020
Maintenance of financial records	Maintenance of Financial Records.pdf	pdf	5f9c303808242707d4a7624c	10/30/2020
Personnel policies	Personnel Policy.pdf	pdf	5f9c304b57d9d707ee4d6bd5	10/30/2020
Prevention of diversion	Plan to Prevent Diversion.pdf	pdf	5f9c306bbd0d8e081433b52a	10/30/2020
Quality control and testing	Quality Control & Testing.pdf	pdf	5f9c30930daeb60847faa881	10/30/2020

procedures				
Storage of marijuana	Storage SOP.pdf	pdf	5f9c30dddfcf9f07cd9433f7	10/30/2020
Transportation of marijuana	Transportation Plan.pdf	pdf	5f9c30fa08242707d4a7625c	10/30/2020
Security plan	Security SOP.pdf	pdf	5f9c3129dfcf9f07cd943404	10/30/2020
Delivery procedures	Delivery SOP.pdf	pdf	5f9c31558cc05c081b1b5a17	10/30/2020
Dispensing procedures	Dispensing SOP.pdf	pdf	5f9c316d0daeb60847faa897	10/30/2020
Record-keeping procedures	Record-Keeping.pdf	pdf	5f9c332157d9d707ee4d6c00	10/30/2020
Qualifications and training	2ed36055-b187-47b8-b680-3b4b42a061cc.pdf	pdf	5fa59cd1a75869080486b9a7	11/06/2020
Energy compliance plan	Energy Compliance Plan.pdf	pdf	61c22e0612daf944393835e3	12/21/2021
Diversity plan	SQC Diversity Plan 4 2023.pdf	pdf	645283810509d600099279c0	05/03/2023

COMPLIANCE WITH POSITIVE IMPACT PLAN

Progress or Success Goal 1

Description of Progress or Success: SQ Causeway is not operational, our two current employees both qualify as social equity and economic empowerment applicants.

COMPLIANCE WITH DIVERSITY PLAN

Diversity Progress or Success 1

Description of Progress or Success: SQ Causeway is not operational, our two current employees both qualify as social equity and economic empowerment applicants.

HOURS OF OPERATION

Monday From: 9:00 AM	Monday To: 9:00 PM
Tuesday From: 9:00 AM	Tuesday To: 9:00 PM
Wednesday From: 9:00 AM	Wednesday To: 9:00 PM
Thursday From: 9:00 AM	Thursday To: 9:00 PM
Friday From: 9:00 AM	Friday To: 9:00 PM
Saturday From: 9:00 AM	Saturday To: 9:00 PM
Sunday From: 10:00 AM	Sunday To: 6:00 PM

ATTESTATIONS

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

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

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

Notification:

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

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

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

AGREEMENTS WITH MARIJUANA RETAILERS

No records found

MARIJUANA RETAILER AGREEMENT DOCUMENTATION

Supporting Document:

Document Category	Document Name	Type	ID	Upload Date
	CAUSEWAY QCC CANNABIS DELIVERY CONTRACT copy (1).pdf	pdf	640f38a13a44570008adc82d	03/13/2023

AGREEMENTS WITH THIRD-PARTY TECHNOLOGY PLATFORM PROVIDER

No records found

THIRD-PARTY TECHNOLOGY PLATFORM PROVIDER DOCUMENTATION

No documents uploaded

SQ Causeway Plan to Remain Compliant with Local Zoning

SQ Causeway will remain compliant at all times with the local zoning requirements set forth in the Clinton Zoning Bylaw. In accordance with Zoning Bylaw Section 6840, SQ Causeway's proposed Marijuana Delivery Establishment is located in the Business Retail District designated for Marijuana Establishments. 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. SQ Causeway has or will apply for any other local permits required to operate a Marijuana Delivery Establishment at the proposed location. SQ Causeway will comply with all conditions and standards set forth in any local permit required to operate a Marijuana Retailer at SQ Causeway's proposed location. SQ Causeway has already attended several meetings with various municipal officials and boards to discuss SQ Causeway's plans for a proposed Marijuana Delivery Establishment and has executed a Host Community Agreement with Clinton. SQ Causeway will continue to work cooperatively with various municipal departments, boards, and officials to ensure that SQ Causeway's Marijuana Delivery Establishment remains compliant with all local laws, regulations, rules, and codes with respect to design, construction, operation, and security. SQ Causeway has also retained the law firm Locke Lord LLC to assist with ongoing compliance with local zoning requirements.

Attachment C
Notice to Permitting Office

SQ Causeway, LLC
731 Main St.
Clinton, MA 01510
617-429-8473 / info@sqcauseway.com

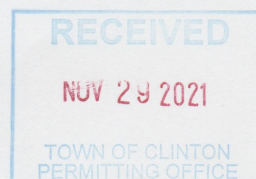
Dear Neighbor,

SQ Causeway is opening a Marijuana Delivery Operator Establishment at 731 Main St. Clinton, MA 01510. We invite you to attend an informational forum to be held at the Clinton Senior Center, 271 Church Street, Clinton, MA 01510 on December 15, 2021 at 6:00 PM.

Information presented at the community outreach hearing will include, but not be limited to:

- The type of Adult-use Marijuana Establishment to be located at the Premises;
- Information adequate to demonstrate that the Adult-use Marijuana Establishment location will be maintained securely;
- Steps to be taken by the Adult-use Marijuana Establishment to prevent diversion to minors;
- A plan by the Marijuana Establishment to positively impact the community; and
- Information adequate to demonstrate that the location will not constitute a nuisance to the community by noise, odor, dust, glare, fumes, vibration, heat, glare, or other conditions likely to cause nuisance.

After an overview of the company's operations neighbors' questions and concerns will be addressed.



Community Outreach Meeting Attestation Form

Instructions

Community Outreach Meeting(s) are a requirement of the application to become a Marijuana Establishment (ME) and Medical Marijuana Treatment Center (MTC). 935 CMR 500.101(1), 500.101(2), 501.101(1), and 501.101(2). The applicant must complete each section of this form and attach all required documents as a single PDF document before uploading it into the application. If your application is for a license that will be located at more than one (1) location, and in different municipalities, applicants must complete two (2) attestation forms – one for each municipality. Failure to complete a section will result in the application not being deemed complete. Please note that submission of information that is “misleading, incorrect, false, or fraudulent” is grounds for denial of an application for a license pursuant to 935 CMR 500.400(2) and 501.400(2).

Attestation

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

1. The Community Outreach Meeting was held on the following date(s): 12/15/21
2. At least one (1) meeting was held within the municipality where the ME is proposed to be located.
3. At least one (1) meeting was held after normal business hours (this requirement can be satisfied along with requirement #2 if the meeting was held within the municipality and after normal business hours).



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

a. Date of publication:

12/3, 12/10/21

b. Name of publication:

Telegram
+ Gazette

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

a. Date notice filed:

11/29/21

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

a. Date notice(s) mailed:

12/1/21

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



Name of applicant:

SQ Causeway

Name of applicant's authorized representative:

Robert J Verney

Signature of applicant's authorized representative:

Robert J Verney

Host Community Agreement Certification Form

Instructions

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

Certification

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

1. Name of applicant:

SQ Causeway LLC

2. Name of applicant's authorized representative:

Robert Verney

3. Signature of applicant's authorized representative:

Robert J Verney

4. Name of municipality:

Clinton

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

Michael J. Ward



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

Michael J. Ward

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

mward@clintonma.gov

8. Host community agreement execution date:

10/21/20



Attachment C Notice to Abutters

SQ Causeway, LLC
731 Main St.
Clinton, MA 01510
617-429-8473 / info@sqcauseway.com

Dear Neighbor,

SQ Causeway is opening a Marijuana Delivery Operator Establishment at 731 Main St. Clinton, MA 01510. We invite you to attend an informational forum to be held at the Clinton Senior Center, 271 Church Street, Clinton, MA 01510 on December 15, 2021 at 6:00 PM.

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After an overview of the company's operations neighbors' questions and concerns will be addressed.

USPS TRACKING # 9114 9999 4431 4277 0703 43
& CUSTOMER
RECEIPT
For Tracking or inquiries go to USPS.com
or call 1-800-222-1811.

QUINCY
47 WASHINGTON ST
QUINCY, MA 02169-5301
(800)275-8777
12/01/2021 10:33 AM

Product	Qty	Unit Price	Price
Prepaid Mail	1		\$0.00

Clinton, MA 01510
Weight: 0 lb 0.40 oz
Acceptance Date: Wed 12/01/2021
Tracking #: 9114999944314277070343

Grand Total: \$0.00

USPS is experiencing unprecedented volume increases and limited employee availability due to the impacts of COVID-19. We appreciate your patience.

Preview your Mail
Track your Packages
Sign up for FREE @
<https://informedelivery.usps.com>

Earn rewards on your business account purchases of Priority Mail labels with the USPS Loyalty program by using Click and Ship. Visit www.usps.com/smallbizloyalty for more info.

All sales final on stamps and postage. Refunds for guaranteed services only. Thank you for your business.

Tell us about your experience. Go to: <https://postalexperience.com/Pos> or scan this code with your mobile device.



or call 1-800-410-7420.

UFN: 240045-0169
Receipt #: 840-50200065-3-5825042-
Clerk: 16

Attachment B
Notice to Clerk



SQ Causeway, LLC
731 Main St.
Clinton, MA 01510
617-429-8473 / info@sqcauseway.com

11-29-21A10:56 RCVD

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After an overview of the company's operations neighbors' questions and concerns will be addressed.

Attachment A

Notice to Selectmen

SQ Causeway, LLC
731 Main St.
Clinton, MA 01510
617-429-8473 / info@sqcauseway.com

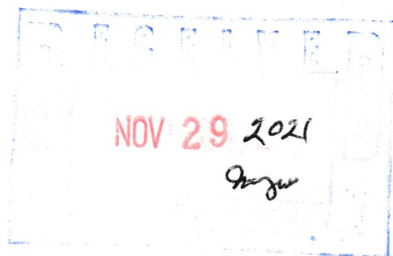
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THE ITEM

Item calendar for the Dec. 3 Item

The Item

Published 12:46 p.m. ET Dec. 1, 2021

*Editor's note: Send listings for events happening in any of the seven towns to:
TheItem@telegram.com.*

BERLIN

Berlin-Boylston SEPAC: meeting Monday, Dec. 6, 6:30 p.m., for a basic rights presentation and general meeting online. To join, send a message to info.bbrsd.sepac@gmail.com for details. For information: www.sepac-berlin-boylston.org.

CHS Class of 1972 Reunion Fundraiser: Chicken shoot, Sunday, Dec. 5, 1-3 p.m., Breakaway Billiards, 104 Sterling St.; doors open at noon. Raffles and fun. Open to the public.

Holiday Party with Karaoke: at Walter P. "Miz' O'Malley VFW Post 523, 10 Allen St., Saturday, Dec. 11, 7-11 p.m.; doors open at 6 p.m. Even open to the public.

Community Outreach Meeting: for SQ Caseway LLC marijuana establishment, proposed for 731 Main St., will be held Wednesday, Dec. 15, 6 p.m., Clinton Senior Center, 271 Church St. The meeting will be an informational forum to discuss operations, answer questions and air concerns.

Item Appeal Representatives: will meet with clients the first and third Wednesdays, 6-7 p.m., in the basement of St. John's Church. The next session is Dec. 15. Subject to change due to COVID and volunteer availability. Masks required. Money is not given out at the time; this is to fill out the forms to start the process. Funds are still very limited, but representatives will try their best to help those in need.

Wachusett Sunday Hike: Sunday, Dec. 19, 10 a.m.; meet at the Wachusett Reservoir,

SQ Causeway Plan to Positively Impact Areas of Disproportionate Impact

Overview: SQ Causeway is dedicated to tangible business practices which promote equity in its operations for disproportionately impacted populations. To support such populations, SQ Causeway has created the following Plan to Positively Impact Areas of Disproportionate Impact.

Goal #1: SQ Causeway's company hiring policy mandates a minimum of 50% staff residency in the 2 CCC designated areas of disproportionate impact listed below.

- Braintree
- Quincy

[Guidance-for-Identifying-Areas-of-Disproportionate-Impact.pdf \(mass-cannabis-control.com\)](#)

Program #1: SQ Causeway will list open job postings as advertisements in local publications such as The Patriot Ledger and online publications such as wickedlocal.com, indeed.com. & linkedin, stating that we are specifically looking to hire residents of these 2 CCC designated areas of disproportionate impact.

Annual Measurement of Goal Completion: SQ Causeway recordkeeping policy mandates that during annual CCC license renewal the CEO certifies and documents that the Positive Impact Goal of 50% staff residency in the CCC designated areas of disproportionate impact of Braintree and Quincy has been met.

Goal #2: SQ Causeway's company hiring policy mandates a minimum of 50% of its staff are Massachusetts residents who have past drug-convictions or otherwise meet the CCC's requirements (below) for entry into the Social Equity (SEA) & Economic Empowerment (EEA) Programs.

[Equity Programs - Cannabis Control Commission Massachusetts \(masscannabiscontrol.com\)](#)

Program #2: SQ Causeway will list open job postings as monthly advertisements in local publications such as The Worcester Telegram, Patriot Ledger, and online publications such as wickedlocal.com, indeed.com. & linkedin, stating that we are specifically looking to hire SEA's, EEA's, and Massachusetts residents who have past drug-convictions.

Annual Measurement of Goal Completion: SQ Causeway recordkeeping policy mandates that during annual CCC license renewal the CEO certifies and documents the Positive Impact Goal of a minimum of 50% of its staff are Massachusetts residents who have past drug-convictions or otherwise meet the CCC's requirements for entry into the Social Equity & Economic Empowerment Programs has been met.

ADDITIONAL REQUIREMENTS TO PLAN

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



The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$500.00

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

Certificate of Organization

(General Laws, Chapter)

Identification Number: 001420657

1. The exact name of the limited liability company is: SQ CAUSEWAY LLC

2a. Location of its principal office:

No. and Street: 166 TREFTON DR.
 City or Town: BRAINTREE State: MA Zip: 02184 Country: USA

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

No. and Street: 166 TREFTON DR.
 City or Town: BRAINTREE State: MA Zip: 02184 Country: USA

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

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:

Name: ROBERT J. VERNEY
 No. and Street: 166 TREFTON DR.
 City or Town: BRAINTREE State: MA Zip: 02184 Country: USA

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

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
MANAGER	ROBERT J. VERNEY	166 TREFTON DR. BRAINTREE, MA 02184 USA

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
SOC SIGNATORY	ROBERT JAMES VERNEY	166 TREFTON DR. BRAINTREE, MA 02184 USA

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
REAL PROPERTY	ROBERT JAMES VERNEY	166 TREFTON DR. BRAintree, MA 02184 USA

9. Additional matters:

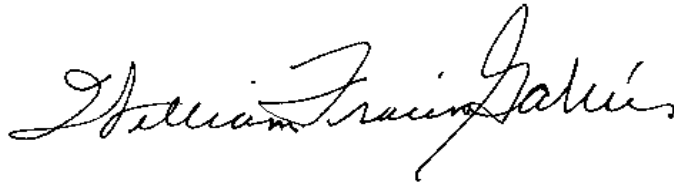
SIGNED UNDER THE PENALTIES OF PERJURY, this 15 Day of January, 2020,
ROBERT J. VERNEY

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

THE COMMONWEALTH OF MASSACHUSETTS

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

January 15, 2020 02:55 PM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

SQ Causeway

Corporate Bylaws

BYLAWS OF SQ Causeway, LLC.

Section 1. ARTICLES OF ORGANIZATION, LOCATION, CORPORATE SEAL AND FISCAL YEAR

1.1 Articles of Organization. The name and purposes of the Corporation shall be as set forth in Its Articles of Organization. These Bylaws, the powers of the Corporation and of its directors and officers, and all matters concerning the conduct and regulation of the affairs of the Corporation shall be subject to such provisions In regard thereto, If any, as are set forth In the Articles of Organization.

1.2 Purpose. To engage In civic, educational and benevolent activities as per MGL Ch. 180 §4. This purpose includes making medical marijuana available to qualified patients and their personal caregivers in a safe, healthy, and clean environment that complies with the laws of The Commonwealth of Massachusetts and the directives of the Massachusetts Department of Public Health. Additionally, the purpose includes providing palliative and other services to qualified patients, as well as educational materials regarding the potential benefits and dangers associated with the use of medical marijuana.

As permitted by law, the Corporation may engage in any and all activities in furtherance of, related to, or incidental to these purposes, the activities being lawful for a Corporation formed under Chapter 180 of the General Laws of Massachusetts.

1.3 Location. The principal office of the Corporation in The Commonwealth of Massachusetts shall be 731 Main St. Clinton, MA 01510. Initially be located at the place set forth In the Articles of Organization of the Corporation. The director(s) may change the location of the principal office In The Commonwealth of Massachusetts effective upon filing a certificate with the Secretary of the Commonwealth.

1.4 Corporate Seal. The director(s) may adopt and alter the seal of the Corporation.

1.5 Fiscal Year. The fiscal year of the Corporation shall end on December 31 In each year unless the director(s) changes the fiscal year by filing a certificate with the Secretary of the Commonwealth.

1.6 Annual Meeting. The annual meeting of the Corporation shall be held not later than the last day of November at such time and place, as the director(s) shall designate.

1.7 Gender. The personal pronoun "he" or possessive pronoun "his", when appropriate, shall be construed to mean "she" or "her" and the word "chairman" shall be construed to include a female.

1.8 For-Profit Operation.

(a) No dividends, liquidating dividends, or distributions shall be declared or paid by the Corporation to any private Individual, member, officer, or director of the Corporation.

(b) No part of the net earnings or net income of the Corporation shall inure to the benefit of any private individual or officer or director of the Corporation; provided, however, that such a person may receive reasonable compensation for sales, leases or loans, or personal services rendered which are necessary to carrying out the purposes of the Corporation.

(c) Notwithstanding any other provision of these Articles of Organization, the Corporation shall not carry on any other activities not permitted to be carried out by a Corporation that Is formed under M.G.L c. 180, is a registered marijuana dispensary pursuant to 105 CMR 725.000 and is in compliance with the laws ofThe Commonwealth of Massachusetts.

Section 2. NO MEMBERS

The Corporation shall not have members. Any action or vote required or permitted by M.G.L. ch. 180 to be taken by members shall be taken by action or vote of the same percentage of directors in accordance with M.G.L. ch. 180, §3.

Section 3. SPONSORS, BENEFACTORS, CONTRIBUTORS, ADVISORS, FRIENDS OF THE CORPORATION

The director(s) may designate certain persons or groups of persons as sponsors, benefactors, contributors, advisors or friends of the Corporation or such other title as they deem appropriate. Such persons shall serve only in an honorary capacity and, except as the director(s) shall otherwise designate, shall in such capacity have no right to notice of or to vote at any meeting, shall not be considered for purposes of establishing a quorum, and shall have no other rights or responsibilities.

Section 4. BOARD OF DIRECTORS

4.1 Powers. The business and affairs of the Corporation shall be controlled and governed by the Board of the Directors who may exercise all the powers of the Corporation as permitted by law.

4.2 Number and Election. The director(s) shall determine the number of directors and the manner by which new directors are nominated and appointed. The names and addresses of the initial Board of Directors are:

1. Robert Verney, 166 Trefton Drive. Braintree, MA 02184

4.3 Term of Office. Director(s) shall determine the length and number of terms to be served by directors, and these Bylaws will then be updated to reflect such term.

4.4 Meetings. The Board of Directors shall hold annual meetings each year and may select the time and place for annual and other meetings of the Board. Other meetings of the Board of Directors may be called by the president or by a majority of the

directors then in office by delivering notice in writing by mail, facsimile or electronic transmission, at his usual or last known business or residence address of the

date, time, place, and purpose of such meeting, to all directors at least three (3) days In advance of such meeting.

4.5 Waiver of Notice for Meetings. Whenever any notice of a meeting is required to be given to any director under the Articles of Organization, these Bylaws, or the laws of Massachusetts, a waiver of notice in writing signed by the director, whether before or after the time of the meeting, shall be equivalent to the giving of such notice.

4.6 Quorum. At any meeting of the directors a majority of the directors then in office shall constitute a quorum. Any meeting may be adjourned by a majority of the votes cast upon the question, whether or not a quorum is present, and the meeting may be held as adjourned without further notice.

4.7 Action by Vote. When a quorum is present at any meeting, a majority of the directors present and voting shall decide any question, including election of officers, unless otherwise provided by law, the Articles of Organization, or these Bylaws.

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

4.9 Qualifications. The directors shall at all times have and qualify for a dispensary agent registry identification card issued by the Massachusetts Department of Public Health. At any time should a director fail to qualify for a dispensary agent registry Identification card or have such card revoked pursuant to 105 CMR 725.000, the director shall be deemed automatically removed from the Board.

4.10 Presence Through Communications Equipment. Unless otherwise provided by law or the articles of organization, directors may participate in any meeting of the Board of Directors by means of a conference telephone or similar electronic or

communications equipment by means of which all persons participating in the meeting can hear each other at the same time, and participation by such means shall constitute presence in person at a meeting.

Section 5. OFFICERS AND AGENTS

5.1 Number and Qualification. The officers of the Corporation shall be a president, treasurer, clerk and such other officers, if any, as the director(s) may determine. The Corporation may also have such agents, if any, as the director(s) may appoint. An officer may, but need not, be a director. The clerk shall be a resident of Massachusetts unless the Corporation has a resident agent duly appointed for the purpose of service of process. A person may hold more than one office at the same time. If required by the director(s), any officer shall give the Corporation a bond for the faithful performance of his duties in such amount and with such surety or sureties as shall be satisfactory to the directors.

5.2 Election. The officers of the Corporation shall be elected by the Board of Directors at the annual meeting. Each officer shall hold office until a successor shall have been elected and qualified.

5.3 Tenure. The president, treasurer and clerk may each hold office for the lifetime of the Corporation.

5.4 President. Unless otherwise determined by the directors, the president shall be the chief executive officer of the Corporation and, subject to the control of the directors, shall have general charge and supervision of the affairs of the Corporation. If no chairman of the Board of Directors is elected, the president shall preside at all meetings of the directors, except as the directors otherwise determine. The president shall have such other duties and powers as the directors shall determine.

5.5 Treasurer. The treasurer shall be the chief accounting officer of the Corporation. He shall be in charge of its financial affairs, funds, securities and valuable papers and shall keep full and accurate records thereof. He shall also be in charge of its books of account and accounting records, and of its accounting procedures. It shall be the duty

of the treasurer to prepare or oversee all filings required by the Commonwealth of Massachusetts, the Internal Revenue Service, and other federal or state agencies. He shall have such other duties and powers as designated by the director(s) or the president.

5.6 Clerk. The clerk shall record and maintain records of all proceedings of the director(s) in a book or series of books kept for that purpose, which book or books shall be kept within the Commonwealth at the principal office of the Corporation or at the office of its clerk or of its resident agent and shall be open at all reasonable times to the inspection of any director. Such book or books shall also contain records of all meetings of incorporators and the original, or attested copies, of the Articles of Organization and Bylaws and names of all directors and the address of each. If the clerk is absent from any meeting of directors, a temporary clerk chosen at the meeting shall exercise the duties of the clerk at the meeting. The clerk shall have custody of the seal of the Corporation.

5.7 Chairman of the Board of Directors. If a chairman of the Board of Directors is elected, he or she shall preside at all meetings of the directors except as the directors shall otherwise determine, and shall have such other powers and duties as may be determined by the directors.

Section 6. RESIGNATIONS, REMOVALS AND VACANCIES

6.1 Resignations. Any director or officer may resign at any time by delivering his resignation in writing to the chairman of the board, if any, or the president or the clerk or to the Corporation at its principal office. Such resignation shall be effective upon receipt unless specified to be effective at some other time. If there is only one director of the Corporation, the director may not resign without appointing a new director, updating these Bylaws or dissolving the Corporation. ' 6.2 Removals. A sole director may not be removed unless another is appointed or the Corporation is dissolved. In the event that additional directors exist, a director may be removed with or without cause by a two-thirds (2/3) vote of a majority of the directors then In office (not including himself). Being the same person who Is acting as director and corporate

officers, that person may not be removed without a new person being appointed, or the dissolution of the Corporation.

An officer may be removed for cause by unanimous vote (not including himself) only after reasonable notice and opportunity to be heard before the body proposing to remove him on the occurrence of any of the following events:

(a) upon a good faith finding by the directors of (i) the failure of such director or officer to perform his assigned duties for the Corporation, (ii) dishonesty, gross negligence or willful misconduct, or (iii) the conviction of, or the entry of a pleading of guilty or nolo contendere by such director or officer to, any crime involving moral turpitude or any felony;

(b) upon any period of inactivity on the part of such director or officer for the preceding twelve month period prior to such removal as determined by the directors in their reasonable discretion; and

(c) upon the disability of such director or officer. As used in this section, the term "disability" shall mean the inability of such director or officer, due to a physical, emotional or mental disability, for a period of one hundred and twenty (120) days, whether or not consecutive, during any three hundred and sixty (360) day period to perform his assigned duties for the Corporation. A determination of disability shall be made by the directors in their reasonable discretion, but requiring a unanimous vote of directors (not including the vote of the director who may be disabled).

6.3 No Right to Compensation. No director or officer resigning, and (except where a right to receive compensation shall be expressly provided in a duly authorized written agreement with the Corporation) no director or officer removed, shall have any right to any compensation as such director or officer for any period following his resignation or removal, or any right to damages on account of such removal, whether his compensation be by the month or by the year or otherwise; unless the director(s) shall, in his discretion, provide for compensation.

6.4 Vacancies. Any vacancy in any office or on the board of directors may be filled by the directors by a two-thirds (2/3) vote of a majority of the directors then in office. The directors shall elect a successor if the office of the president, treasurer or clerk becomes vacant and may elect a successor If any other office becomes vacant. Each such successor shall hold office for the unexpired term and In the case of the president, treasurer and clerk until his successor is chosen and qualified, or in each case until he sooner dies, resigns, or is removed. The directors shall have and may exercise all their powers notwithstanding the existence of one or more vacancies in their number.

Section 7. COMMITTEES

The Board of Directors may create such standing and special committees as it determines to be in the best interest of the Corporation. The Board of Directors shall determine the duties, powers, and composition of such committees, except that the Board shall not delegate to such committees those powers which by law may not be delegated. Each such committee shall submit to the Board of Directors at such meetings as the Board may designate, a report of the actions and recommendations of such committees for consideration and approval by the Board of Directors. Any committee may be terminated at any time by the Board of Directors.

Section 8. EXECUTION OF PAPERS

Except as the director(s) may generally, or In particular cases, authorize the execution thereof in some other manner, all deeds, leases, transfers, contracts, bonds, notes, checks, drafts and other obligations made in the course of the Corporation's regular business, accepted or endorsed by the Corporation shall

be signed by the president or by the treasurer. Except as otherwise provided by M.G.L. c. 180 or directed by the director(s), the president may authorize in writing any officer or agent of the Corporation to sign, execute and acknowledge such documents and Instruments in his or her place and stead. The clerk of the Corporation Is authorized and empowered to sign in attestation all documents so signed, and to

certify and issue copies of any such document and of any resolution adopted by the director(s) of the Corporation, provided, however, that an attestation is not required to enable a document to be an act of the Corporation.

Any recordable instrument purporting to affect an interest in real estate, executed in the name of the Corporation by the president or a vice president and the treasurer or an assistant treasurer, who may be one and the same person, shall be binding on the Corporation in favor of a purchaser or other person relying in good faith on such Instrument, notwithstanding any inconsistent provisions of the Articles of Organization, Bylaws, resolutions or votes of the Corporation.

Section 9. COMPENSATION; PERSONAL LIABILITY

9.1 Compensation. Except as otherwise provided in Section 6.3, the director(s) shall be entitled to receive for their services such amount, if any, as the director(s) may determine, which may include expenses of attendance at meetings. The director(s) shall not be precluded from serving the Corporation in any other capacity and receiving compensation for any such services.

9.2 No Personal Liability. The director(s) and the officers of the Corporation shall not be personally liable for any debt, liability or obligation of the Corporation for or arising out of a breach of fiduciary duty as an officer or director notwithstanding any provision of law imposing such liability; provided, however, that the foregoing shall not eliminate or limit the liability of an officer or director to the extent that such liability is imposed by applicable law (i) for a breach of the officer's or director's duty of loyalty to the Corporation or its members, (ii) for acts or omissions not in good faith or which involve intentional misconduct or a knowing violation of the law, or (iii) for any transaction from which the officer or director derived an improper personal benefit.

All persons, corporations or other entities extending credit to, contracting with, or having any claim against, the Corporation, may look only to the funds and property of the Corporation for the payment of any such contract or claim, or for the payment of any debt, damages, judgment or decree, or of any money that may otherwise become due or payable to them from the Corporation.

Section 10. INDEMNIFICATION

The Corporation shall, to the extent legally permissible, indemnify any person serving or who has served at any time as a director, executive director, president, vice president, treasurer, assistant treasurer, clerk, assistant clerk or other officer of the Corporation, or at its request as a director or officer of any organization, or at its request in any capacity with respect to any employee benefit plan, and may indemnify an employee or other agent who has so served, against all liabilities and expenses, including, without limitation, amounts paid in satisfaction of judgments, in compromise or as fines and penalties, and counsel fees, reasonably incurred by him in connection with the defense or disposition of any action, suit or other proceeding, whether civil or criminal, in which he may be involved or with which he may be threatened, while in office or thereafter, by reason of his being or having been such a director or officer (or in any capacity with respect to any employee benefit plan), except with respect to any matter as to which he shall have been adjudicated in any proceeding not to have acted in good faith in the reasonable belief that his action was in the best interests of the Corporation (or, to the extent that such matter relates to service with respect to an employee benefit plan), in the best interest of the participants or beneficiaries of such employee benefit plan; provided, however, that as to any matter disposed of by a compromise payment by such person, pursuant to a consent decree or otherwise, no indemnification either for said payment or for any other expenses shall be provided unless such compromise and indemnification shall be approved:

(i) by decision of the sole director

(ii) by a majority vote of a quorum consisting of disinterested directors in the event that additional directors are appointed; ·

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

(iii) if there are not two or more disinterested directors in office, then by a majority of the directors then in office, provided they have obtained a written finding by special

independent legal counsel appointed by a majority of the directors to the effect that, based upon a reasonable investigation of the relevant facts as described in such opinion, the person to be indemnified appears to have acted in good faith in the reasonable belief that his action was in the best interests of the Corporation (or, to the extent that such matter relates to service with respect to an employee benefit plan, in the best interests of the participants or beneficiaries of such employee benefit plan); or

(iv) by a court of competent jurisdiction.

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

The right of indemnification hereby provided shall not be exclusive of or affect any rights to indemnification to which corporate personnel other than the persons designated in this Section may be entitled by contract, by vote of the board of directors, or otherwise under law.

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

if any term or provision hereof, or the application thereof to any person or circumstances, shall to any '

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

Section 11. AMENDMENTS

These Bylaws may be altered, amended or repealed, In whole or in part, by a two-thirds (2/3) vote of a majority of the directors then in office.

Section 12. ACTIVITIES

12.1 Investments. The Corporation shall have the right to retain all or any part of any securities or property acquired by it in whatever manner, and to invest and reinvest any funds held by it, according to the judgment of the dlrector(s), without being restricted to the class of Investments which a trustee is or may hereafter be permitted by law to make or any similar restriction, provided, however, that no action shall be taken by or on behalf of the Corporation if such action Is a prohibited transaction.

12.2 Loans. No moneys shall be borrowed on behalf of the Corporation and no evidences of such indebtedness shall be issued in its name unless authorized by a resolution of the Board of Directors. Such authority may be general or confined to specific instances.

12.3 Deposits. All funds of the Corporation, not otherwise employed, shall be deposited from time to time to the credit of the Corporation In such banks, Investment firms or other depositories as the Board of Directors shall select.

12.4 Conflict of Interest. Whenever a director or officer has a financial or personal interest in any matter coming before the Board of Directors, the affected person shall a) fully disclose the nature of the interest and b) withdraw from discussion, lobbying, and voting on the matter. Any transaction or vote involving a potential conflict of

Interest shall be approved only when a majority of disinterested directors determine that it is in the best interest of the Corporation to do so. The minutes of meetings at which such votes are taken shall record such disclosure, abstention and rationale for approval.

12.5 Audits. Within four months after the close of the Corporation's fiscal year, the Corporation will prepare reviewed financial statements in accordance with generally accepted accounting principles (GAAP) and make these statements available to any interested parties. In the event that the Corporation has total gross revenue in excess of \$500,000.00 per year the Corporation will prepare independently audited financial statements, in accordance with GAAP, and make those available to any interested parties. In the event that the Corporation becomes a Public Charity under M.G.L. Chapter 12, Section 8 et seq. or is otherwise required by the Department of Public Health or any other provision of Massachusetts law to file audited or reviewed financial statements and a Form PC, such auditing and filing will be completed in accordance with GAAP and performed in a timely manner..

Section 13. INSURANCE

The Corporation may purchase and maintain insurance (including but not limited to insurance for legal expenses and costs incurred in connection with defending any claim, proceeding or lawsuit) on behalf of any person who is or was a director, officer, employee, fiduciary or agent of the Corporation or who, while serving in this role, is or was serving at the request of the Corporation as a director, officer, partner, trustee, employee, fiduciary or agent of any other foreign or domestic Corporation, partnership, joint venture, trust, employee benefit plan, or other enterprise, against any liability asserted against him or incurred by him in any such capacity, or arising out of his status as such, whether or not the Corporation would have the power to indemnify him against such liability under the provisions of Section 10. In addition the Corporation shall maintain liability insurance coverage in compliance with 105 CMR 725.105(Q).

Section 14. CORPORATE INTEGRITY POLICY

It is the policy of the Corporation to encourage and enable directors, officers, and employees to make reports where they believe, in good faith, that acts or omissions unlawful under the laws of the Commonwealth of Massachusetts or unethical may have occurred. With this goal in mind, no one who, in good faith, makes a report shall be subject to retaliation in any form, including adverse employment consequences. Moreover, an employee who retaliates against someone who has made a good faith report is subject to discipline up to and including dismissal from the volunteer position or termination of employment. If after an investigation, the claim is determined to have been made in bad faith or was knowingly false, the individual making the claim will immediately have his or her position in the Corporation revoked.

Section 15. ANTITRUST POLICY

It is the policy of the Corporation to comply fully with all federal and state antitrust laws, which prohibit companies from working together to restrict competition. It is also the policy of the Corporation that it and its director(s) and officers are informed about antitrust laws and recognize possible antitrust issues or questions.

It is legal for competitors within the medical marijuana industry to work together, unless such work unlawfully restricts competition within the industry. Although the Corporation's activities generally do not present antitrust issues, to ensure against inadvertent violations of federal and state antitrust laws, directors, except to insure that prices are reasonable and affordable for the Corporation's patients, and to prevent diversion for non-medical purposes, officers and employees shall not discuss with competitors:

- Increasing, decreasing, or stabilizing prices for medical marijuana or related products and services;

Establishing market monopolies for Member products or services; Refusal to deal with a company because of pricing or distribution practices for medical marijuana or related products or services; Strategies or plans to give business or remove business from a specific company .

Furthermore, directors, officers, and employees shall not engage in any actions or understandings arising in the context of the Corporation's activities which appear to be anti-competitive in purpose or inconsistent with this policy.

In the event that additional directors are appointed, and Board of Director meetings occur, Corporation meetings shall follow a pre-approved agenda and meeting minutes will be prepared and available. Any questions regarding antitrust issues and the Corporation's activities shall be directed to the Chair of the Board, if any, and referred to counsel if deemed necessary.

Section 16. DISSOLUTION

Dissolution of the Corporation will comply with M.G.L. Chapter 180, s. 11. The director(s) may authorize a petition for the dissolution of the Corporation. A two-thirds vote will be required for such dissolution. The Articles of Dissolution form will be filed with the Massachusetts Secretary of State. All annual reports for the last ten years will be filed with the Secretary of State. A letter to the Massachusetts Department of revenue on the Corporation's letterhead will be sent stating that the Corporation is dissolving. All outstanding business will be completed. All outstanding debts will be paid. Any remaining funds in the Corporation will be distributed as per the direction of the director(s) at the meeting authorizing the dissolution. A notice will be published in a newspaper of regular circulation in the County where the Corporation is located.

In the event that the dissolution also requires the Medical Marijuana Dispensary to close, i.e. the dissolution is not because of a transfer of the Dispensary to another nonprofit entity, the following actions will also take place: the Department of Public Health will be notified; the patients and caregivers that obtain medical marijuana will be notified of the Corporation's dissolution via mail, or in-person if the opportunity to notify the patient or caregiver arises prior to the closing of the doors of the Corporation's place of business; any remaining medical marijuana and products that contain medical marijuana will be destroyed at the time the doors of the Registered Marijuana Dispensary are closed, or disposed of in any way consistent with the

direction of the Massachusetts Department of Public Health and the policies and procedures of the Dispensary.

Section 17. SEVERABILITY

The invalidity or unenforceability of any provisions of these Bylaws shall not affect the validity or enforceability of any other provision of this Agreement, which shall remain in full force and effect.

These bylaws have been amended, adopted, and affirmed by the CEO, Robert Verney, May 11 2021.

Signature: _____

Date: _____

SQ Causeway Plan for Obtaining Liability Insurance

SQ Causeway has entered a relationship with Corcoran & Havlin Insurance, 287 Linden St. Wellesley MA to Obtain Liability Insurance. General Liability & Business Interruption will be purchased through the Corcoran & Havlin Insurance cannabis program and will be written with United Specialty Insurance Company. United Specialty is an A (Excellent) rated carrier with A.M. Best Rating Company. We anticipate purchasing coverage at the \$1,000,000 liability limit both in the occurrence and aggregate. The policy will be written on an occurrence form and will be written for a one-year term. A deductible of \$2,500 per claim will apply. Further CCC licensing and Host Community Agreement information are required to enter a formal contract. Below is the contact information for Mark Sawyer.

Mark S. Sawyer | Senior Vice President

Corcoran & Havlin Insurance | [287 Linden St, Wellesley, MA 02482](#)

Office: [781-566-5103](#) | cell: 508-359-4600 | fax: 508-359-8779

email: msawyer@chinsurance.com | www.chinsurance.com | <http://www.linkedin.com/in/markssawyer/>

SQ CAUSEWAY

BUSINESS PLAN

10/20/2020

Executive Summary

Company Name: SQ Causeway, LLC

Location: 731 Main St. Clinton, Massachusetts, 01510

License Type: Delivery

Mission Statement

SQ Causeway is committed to the secure delivery of high quality cannabis products & services.

Local communities, customers, & delivery operators should all benefit from legalized marijuana delivery. We are a 100% Massachusetts owned business that aims to operate in consultation with local stakeholders. As CCC Social Equity Applicants our experiences have taught us the importance of equitable treatment for everyone. Through a holistic approach to our operations, we strive to be good neighbors & additive members of our host cities. Marijuana provides new options for pain management, social anxiety & recreational consumption that have lower long-term community costs than alcohol or misused prescriptions. We proudly offer this alternative to the Massachusetts home consumer. SQ Causeway goods (when legally permissible) and services are offered at reduced rates to Cannabis Control Commission certified SEA's & Economic Empowerment Applicants.

Business Plan Purpose: This business plan is intended to outline the overall structure and strategy of the company for the CCC's Precertification application process.

Company Description

Legal Structure: SQ Causeway is a Massachusetts Limited Liability Company applying for a Precertification from the Massachusetts Cannabis Control Commission. After completing the Precertification process SQ Causeway will file an application for licensure as a Delivery Company consisting of three packets: An Application of Intent packet; a Background Check packet; and a Management and Operations Profile packet.

Type of License: SQ Causeway is applying for a Precertification from the Massachusetts Cannabis Control Commission (CCC) to operate a Marijuana Delivery company in Massachusetts. After completing the Precertification process we will be applying for a Delivery License

Background: Formed in 2018; SQ Causeway registered as a Limited Liability Company with the State of Massachusetts in February 2020. We were approved by the CCC as Social Equity Applicants in July 2019 and completed the inaugural SEA classroom curriculum in April 2020.

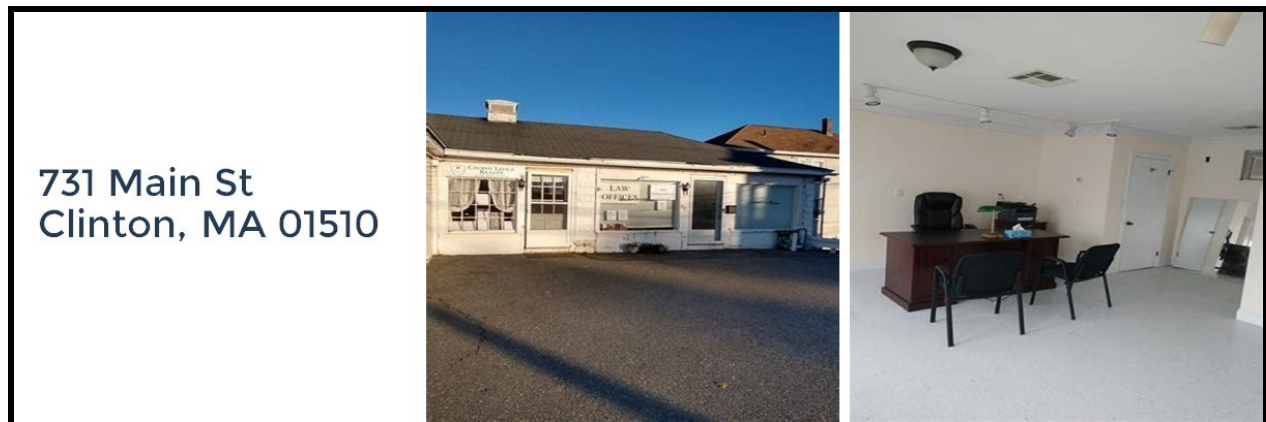
Business Objectives

SQ Causeway's Social Equity Certification (SEA303905) gives the company CCC priority review for delivery licensing which positions the company well to be an early entrant and key long-term member of

the Bay State's rapidly growing recreational cannabis industry. Upon receipt of licensing from the Cannabis Control Commission (MGL 935CMR501.00) and municipality approval SQC will commence delivery operations from the location proposed in Clinton. The initial commercial space will be used for all operations.

- Use SEA certification 3 year (minimum) CCC exclusivity licensing review window for rapid delivery license acquisition.
- Open and provide Massachusetts delivery services.
- Provide premier facilities, supporting digital infrastructure, and client service.
- Coordinate with strategic partners on delivery operations
- Use internet domains to reach a wide consumer base.
- Distribute a wide selection of the cleanest, high-grade recreational marijuana and marijuana infused products.
- Educate clients about the proper usage, benefits, and risks associated with cannabis.
- Advance all aspects of cannabis research and product development.
- Expand beyond brick & mortar retail sales through e-commerce in compliance with the evolution of federal and state law.
- Provide optimal service from originating order through the end client.

Proposed Location for Clinton Data Center:



Community Relations

SQ Causeway is excited to work with town officials and community shareholders in Clinton on this exciting new venture. During the June 3, 2020 Clinton Board of Selectmen Meeting Atty Jay Myers and CEO Bob Verney provided a presentation and overview of SQC proposed operations at 731 Main St. After the presentation a motion to enter Host Community Agreement negotiations between SQ Causeway and the town of Clinton was approved unanimously by the Board. SQ Causeway's Clinton Delivery Establishment will be located in the approved Marijuana Zone at 731 Main Street. SQ Causeway has an approved use LOI with Linda Kadlik, the Main St. location's broker from Crown Ledge Realty. The location will be dedicated to client support and office use, with multiple desks, monitors, telephones and a conference room. **The Clinton Data Center does not house any Marijuana Products.**

731 Main Street Location



Located within Clinton Zoning Map for marijuana establishments



Will comply with all town zoning regulations outlined in section 6800 for recreational marijuana establishments



Serves as a data center providing operations for delivery services



Not transferring or storing cannabis products on site



Professional office: No retail signage, no foot traffic, no walk ins allowed

Security and Compliance

SQ Causeway enforces strict guidelines to ensure the safety and security of its location and its neighbors. The CCC requires in-depth policies and procedures, which we have addressed in SQ Causeway's security procedures plan.

SQ Causeway met with the Clinton Board of Selectmen 6/3/2020 to present a company overview containing relative documents and SOPs for daily operations. More detailed Standard Operating Procedures are listed in this document.

Products and Services

Product Strategy

SQ Causeway contracts with CCC licensed retailers, cultivators, manufacturers, microbusinesses, and all other authorized entities to distribute marijuana and marijuana infused products. These products maintain strict compliance with the regulations and standards set in MGL 935CMR500. Adult Use of Marijuana.

SQC also strictly enforces all Mass Department of Health regulations. Our products will be labeled in compliance with MGL 935 CMR 500 prior to being made available for public distribution.

Products

Our product line will feature a wide range of cannabis and ancillary goods including but not limited to the items listed below:

- Cannabis Flower
- Cannabis pre rolls
- Cannabis Oil; wax, shatter, live resin, sauce, butter

- Oil Cartridges
- Terpenes
- Hashish
- Marijuana Infused Beverages
- Marijuana Infused Products
- Edibles; cookies, chocolate, lollipops, mints, brownies, crackers, gum, lozenges
- Gummies & Gels
- CBD products
- Tinctures
- Topical Salves
- Transdermal patches
- Ointments
- Rolling papers

Advertising and Promotion

SQ Causeway aims to incorporate existing retail advertising and promotion practices with an extensive digital presence to provide the optimal consumer experience. All advertising and product packaging will be compliant with Massachusetts state law. SQC policy mandates strict compliance with SOP “SQ Causeway Advertising & Promotion”. SQ Causeway has developed a comprehensive community outreach plan and will be holding the CCC mandated public notifications and Community Outreach Meeting prior to license application submission. SQC will only engage in forms of marketing or advertising in strict compliance with MGL935CMR501

Pricing

Our retail pricing structure is set at levels close to current black market pricing which reduces the incentive for clients to divert SQ Causeway products for financial gain. We will perform ongoing pricing and market condition analysis which will allow us to adapt to consumer needs while balancing cost to Return on Investment. Our company strives for constant innovation to meet market demands.

Service

Advanced Solutions for Trusted Delivery. Transparency and reliability are keys for both our customers and cannabis industry partners. To that end, we are committed to building an advanced delivery solution that tracks every step of the fulfillment process:

- Pickups scheduled through our software platform are optimized for efficiency, discretion & safety.
- Phone call orders available with options for both an automated menu or live operator.
- Real time audio & visual contact between onsite personnel & delivery agents securely accompanies your product throughout the entire delivery lifecycle.
- Our vehicles are equipped with state-of-the-art technology for optimal security.
- We instantly provide suppliers with a regulatory compliant receipt that includes video covering the entire order lifecycle from placement to client delivery.

SQ Causeway Order Process Workflow:

1. Clinton Data Center: Orders placed online by clients are processed & supported throughout the delivery lifecycle by the Data Center support team. The support team then passes the order instructions to Delivery Agents and destination Marijuana Establishment.

2. Transit Vehicles: Transit Vehicles staffed by licensed Delivery Agents commute to retail partner Marijuana Establishments to pick up Marijuana Products.

3. Licensed Marijuana Establishments: Marijuana Products are packaged at the licensed Marijuana Establishments prior to secure pick up by Delivery Agents.

4. End Client: Delivery Agent securely delivers Marijuana Products to client

All undelivered/returned Marijuana Products are returned to the originating Marijuana Establishment prior to close of business. No Marijuana Products are ever stored in the Clinton Data Center.

Customer Service & Support

- SQC website: <https://www.sqcauseway.com>
- Email: info@sqcauseway.com
- Phone: 617-429-8473

Hours of Operation

Daily: 10:00AM-9:00PM

These hours may expand or contract at SQC's discretion, market conditions, or CCC, Local, and State Regulations.

Plan for obtaining marijuana or marijuana products:

SQ Causeway plans to obtain marijuana or marijuana products by contracting with other Cannabis Control Commission certified licensed establishments in accordance with Massachusetts General Law 935 CMR 500.000: ADULT USE OF MARIJUANA.

Market Analysis

Industry: SQ Causeway's proposed location is located at 731 Main Street, Clinton, MA. A delivery license in this prime Central Mass location allows for SQ Causeway to serve clients in any Massachusetts Municipality that permits it.

Customers In Massachusetts: Sales are expected to increase from \$106 million in 2017 to \$457 million in 2018, 2019 is \$420 million and eventually to \$1.4 billion in 2025, according to New Frontier Data.

Competitive Advantage: SQ Causeway's competitive advantages include being an SEA which qualifies us for expedited licensing review in addition to a 3-year licensing exclusivity period. We will seek to offer customers a premier home delivery experience with demonstrated excellence in operational efficiency,

delivery agent knowledge, product selection and offerings; consistency and quality of product; and delivery to their homes.

Competitors: SQ Causeway's competitors include other dispensaries in Massachusetts, in addition to fellow delivery operators.

Massachusetts Market Opportunities

- SQ Causeway is an early entrant to an exclusive license market.
- Our central Massachusetts location allows us access to numerous lucrative markets.
- Delivery Services' necessity has been emphasized by recent world events.
- While we will likely share the market with other organizations, SQ Causeway believes certain market dynamics allow for a significant first-mover advantage:
 - ★ CCC is exclusively issuing licenses to a relatively low, finite number (400 max)) of EEA & Social Equity Applicants for a minimum of 36 months and perhaps longer dependent on market developments
 - ★ Massachusetts municipalities are not easily granting host community agreements
 - ★ Local zoning regulations and bylaws limit the number of other license type cannabis distribution operations in Massachusetts
 - ★ Retail Establishments have been banned or greatly restricted in the majority of Massachusetts municipalities.
- SQ Causeway is well positioned to capture initial delivery consumer demand and scale into a healthy, expanding adult consumption market

Regulations: SQ Causeway is a Marijuana Establishment which will operate in a manner consistent with the objectives of Massachusetts State Law. SQC will be registered to do business in the Commonwealth as a Limited Liability Company. SQC will maintain the company in good standing with the Massachusetts Secretary of the Commonwealth and the Department of Revenue. SQC will apply for all state and local permits and approvals required to renovate and operate the facility. SQC 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.

Strategy and Implementation

Advertising and Promotion

SQ Causeway aims to incorporate existing retail advertising and promotion practices with an extensive digital presence to provide the optimal consumer experience. All advertising and product packaging will be compliant with Massachusetts' state law. SQC policy mandates strict compliance with our in house SOP: SQ Causeway Advertising & Promotion. We have developed a comprehensive community outreach plan and will be holding the CCC mandated public notifications and Community Outreach Meeting prior to license application submission. SQC will only engage in forms of marketing or advertising in strict compliance with MGL935CMR501

SQ Causeway 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.

Pricing

Our retail pricing structure is set at levels close to current black market pricing which reduces the incentive for clients to divert SQ Causeway products for financial gain. We implement the following control mechanisms:

- Ongoing analysis of our competitors rates.
- Constant adaptation to market conditions.
- Cost to customers vs goods analysis ongoing.

Plan for obtaining marijuana or marijuana products

SQ Causeway plans to obtain marijuana or marijuana products by contracting with other Cannabis Control Commission certified licensed establishments in accordance with Massachusetts General Law 935 CMR 500.000: ADULT USE OF MARIJUANA.

Anticipated Timeline:

- The Massachusetts CCC has created a special accelerated application process for delivery applicants. The application became available on May 28th and we are in the process of submitting the first half of the application now.
- As part of this application, we will be submitting a thorough, detailed plan for how we will operate the business in a secure manner that complies with all relevant regulations.
- Unlike other State licenses, the CCC allows delivery applicants to apply to the State before receiving a Host Community Agreement. We wish to work with the Town of Clinton to finalize a Host Community Agreement while our application is being reviewed by the State.
- While we recognize that this is an ambitious timeline, our goal would be to finalize both the Host Community Agreement process and State application process by mid-to-late summer.
- The Clinton Board of Selectman unanimously approved the motion to enter negotiations for a Host Community Agreement with SQ Causeway at their meeting 6/3/2020.
- SQ Causeway hopes to commence Clinton Data Center operations by late fall and commence initially limited Delivery Operations by winter.

Management Team

CEO: Robert J Verney

Bob founded SQ Causeway in 2019 and is an April 2020 graduate of the nation's first, state-sponsored Cannabis Industry educational curriculum. He has been active in legal cannabis since 2012 and brings 25+ years of broad professional experience; beginning in retail at Stop & Shop, then in manufacturing with Interstate Distributors, and the last 23 spent in the telecommunications industry in Boston with the nation's largest provider; Verizon. A DOT license holder; Bob has extensive customer service background; performing business and residential installs, repairs, maintenance, and troubleshooting. This multidisciplinary cannabis industry knowledge and proven track record of safe results at Verizon allows SQ Causeway to stringently meet all state and industry regulatory requirements.

A lifelong Massachusetts resident; Bob lives in Braintree with his wife and son. He volunteers as a coach with Braintree Youth Soccer and Baseball and plays in the Quincy Men's Softball League. He has long standing relationships with local charities including; The Salvation Army, Rosie's Place, Father Bill's,

South Shore Foster Closet, Good Samaritans, & On The Rise. Bob is a North Quincy High School graduate, 23 year Member of the International Brotherhood of Electrical Workers Local 2222, and member of Robert I. Nickerson Post 382 in Squantum.

Startup Project Team

- Jay Myers: Attorney; Locke Lorde LLP. Jay Myers is a legal consultant. Jay has no control over management, policies, or operations.
- Christina Verney: Human Resources. Christina Verney is a Human Resources consultant. Christina has no control over management, policies, or operations..
- Mike Kowilick: Design/Build Solutions-Kustom Kontracting. Mike is the general contractor for SQ Causeway's facility design. Mike has no control over management, policies, or operations.

Hiring Practices

SQ Causeway is committed to building a talented and diverse team of employees. The company anticipates recruiting, hiring, and training a staff of 5-10 full-time employees, including managers, production associates, and delivery agents when the Clinton Data Center is licensed and operational. SQ Causeway will implement hiring practices that enable us to recruit, hire and train qualified candidates who can become long-term members of the company. We will make a consistent commitment to recruit potential team members from our host community of Clinton. Job preference will also be given to qualified SEA's, EEA's, and applicants from areas of disproportionate impact as defined by the CCC. Further details are documented in the company's Diversity and Positive Impact plans.

Management Policies

SQ Causeway's management policies are stringent and compliant with all state and local law. SQC policy requires that all new hires complete the steps detailed in SOP "New Employee Onboarding" and ongoing training requirements for all employees. This training is documented through annual employee certification of understanding and adherence to SOP's and the policies set forth in the Employee Handbook.

Operating policies and procedures that comply with the Commission's regulations including the following:

- Security plan pertaining to delivery
- Transportation plan
- Inventory plan
- Plan to prevent diversion
- Storage plan
- Delivery plan
- Quality control and testing
- Record-keeping procedures
- Maintenance of financial records
- Qualifications and intended trainings for personnel
- Personnel policies
- Dispensing procedures

Plan for Obtaining Liability Insurance: SQ Causeway has entered a relationship with Corcoran & Havlin Insurance, 287 Linden St. Wellesley MA to Obtain Liability Insurance. General Liability & Business Interruption will be purchased through the Corcoran & Havlin Insurance cannabis program and will be written with United Specialty Insurance Company. United Specialty is an A (Excellent) rated carrier with A.M. Best Rating Company. We anticipate purchasing coverage at the \$1,000,000 liability limit both in the occurrence and aggregate. The policy will be written on an occurrence form and will be written for a one-year term. A deductible of \$2,500 per claim will apply.

Financial plan and projections

Maintaining of Financial Records

SQ Causeway maintains its financial records within CCC vendor approved software. These records include all retail and wholesale revenue, all expenses, wages, capital expenditures, liabilities, and all other items that would appear on SQ Causeway's profit and loss or balance sheet. All financial records maintenance policies comply with or exceed all Commission regulations. These records include but are not limited to:

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

SQ Causeway maintains Standard Operating Procedures which detail the daily operational processes towards the maintenance of financial records which comply with or exceed Commission regulations.

Financial Strategy

SQ Causeway is privately capitalized and fully prepared to commence delivery operations upon completion of Commonwealth, local, and CCC licensing requirements. SQC was founded by and is managed by proven professionals whose assets and experience assure the long term financial suitability of the company. With decades of professional experience in management at one of the most respected corporations in the US; Verizon; SQ Causeway has the background to launch and manage all aspects of a dynamic, innovative, long-term successful business venture.

Projections:

Revenue	Year 1	Year 2	Year 3
Avg Revenue	\$3,750,000.00	\$ 5,000,000.00	\$6,250,000.00
Costs			
<i>1 Pound Incoming \$2k</i>	\$ 1,500,000.00	\$ 2,000,000.00	\$ 2,500,000.00
<i>1 Pound Outgoing \$5k</i>	\$ 3,750,000.00	\$ 5,000,000.00	\$ 6,250,000.00
<i>Total lbs Sold</i>	750	1,000	1,250
<i>Total lbs of Flower</i>	500	667	837
<i>Total lbs of MIPs</i>	250	333	413
Total COGs	\$2,250,000.00	\$3,000,000.00	\$3,750,000.00
Gross Profit	\$2,250,000.00	\$3,000,000.00	\$3,750,000.00
Total SG&A	\$650,000.00	\$864,500.00	\$1,150,000.00
Operating Profit	\$1,600,000.00	\$2,135,500.00	\$2,600,000.00
Income Tax-Federal	\$456,204.38	\$608,272.51	\$760,340.63
Net Income	\$1,143,795.62	\$1,527,227.49	\$1,839,659.37

SQ Causeway

Standard Operating Procedures

Title: Maintenance of Financial Records

Effective Date: 10/20/2020

SQ Causeway will maintain its financial records within CCC vendor approved software. These records include all medical and retail marijuana invoices, revenue, all expenses, wages, capital expenditures, liabilities, and all other items that would appear on SQ Causeway's profit and loss or balance sheet.

SQ Causeway will ensure compliance with all laws and regulations pertaining to its operation as a licensed organization:

These records include but are not limited to:

1. Assets and liabilities
2. Monetary transactions
3. Books of accounts, including journals, ledgers, and supporting documents,
4. SQ Causeway contact records
5. Retail Partner contact records
6. Salary and wages paid to each employee, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the nonprofit corporation, if any.

SQ Causeway

Standard Operating Procedures

Title: Personnel Policies

Effective Date: 10/20/2020

SQ Causeway intends to provide compensation and benefits that will promote low turnover. We will be an equal opportunity employer and will not discriminate on the basis of race, religion, sex, sexual orientation, nationality, age, disability, medical conditions, or other basis prohibited by law. We will comply with all provisions of the Fair Labor Standards Act, and our policies will be reviewed annually and approved by the director of human resources.

Employee personnel files include the following: job application, job description, résumé, records of participation in training events, salary history, records of disciplinary action, and documents related to employee performance reviews, coaching, and mentoring. Personnel files are the property of SQ Causeway and Delivery. Access to employee personal information is restricted to Human Resources and should be classified at all times. With reasonable advance notice, the employee may review their personnel file with human resources.

Our personnel policies will be described in detail in our Employee Handbook, which each employee will be required to read and acknowledge in writing annually.

SQ Causeway personnel policies will include, but are not limited to, the following:

Written Policies:

- Open Door Policy Equal Employment Opportunity and Anti-Harassment
- Accommodations for Qualified Individuals with Disabilities
- Religious Observance Accommodation Policy
- Immigration Law Compliance Policy
- Staffing Plan
- Hours of Work
- Pay Procedures
- Holiday/PTO Policies
- Code of Conduct
- Attendance and Punctuality
- Dress Code
- Drug and Alcohol Free Workplace Policy
- Smoking Policy

SQ Causeway

Standard Operating Procedures

- Communication Policy
- Electronic Communications, Computer and Internet Use Policy Confidentiality and Trade Secrets
- Conflicts of Interest
- Disciplinary Policy
- Probationary Period
- Performance Evaluations
- Personnel Records
- Confidential Document Storage & Retention
- Family Medical Leave Act
- Military Leave
- Employee Safety
- Background Checks
- Employee Monitoring
- Employee Access
- Employee Hygiene
- SQ Causeway complies with both the Commonwealth of Massachusetts and federal requirements for workplace postings.

Background Check :

SQ Causeway delivery agents, employees, contractors and all other required associated individuals and entities will submit the following information to the Commission approved background check vendor.

The list of individuals and entities in 935 CMR 500.101(1)(a)1.;
Information for each individual identified in 935 CMR 500.101(1)(a)1., which shall include:

- a. The individual's full legal name and any aliases;
- b. The individual's address;
- c. The individual's date of birth;
- d. A photocopy of the individual's driver's license or other government-issued identification card;
- e. A CORI Acknowledgment Form, pursuant to 803 CMR 2.09: Requirements for Requestors to Request CORI, provided by the Commission, signed by the individual and notarized;

SQ Causeway

Standard Operating Procedures

f. Authorization to obtain a full set of fingerprints, in accordance with M.G.L. c. 94G, § 21, submitted in a form and manner as determined by the commission.

SQ Causeway maintains a staffing plan and records in compliance with 935 CMR 500.105(9).

SQ Causeway maintains a plan describing how confidential information will be maintained in a manner compliant with 935 CMR 500.105(1)

Any SQ Causeway employee who has diverted marijuana, engaged in unsafe practices, or been convicted or entered a guilty plea for a felony charge of distribution of a drug to a minor is subject to company policy which mandates the immediate dismissal of the employee.

SQ Causeway

Standard Operating Procedures

Title: Record-Keeping

Effective Date: 10/20/2020

SQ Causeway intends to adopt Standard Operating Procedures for maintaining records that conform to medical and retail marijuana regulations and best practice. SQ Causeway maintains a detailed description of plans, Standard Operating Procedures, and systems adopted and maintained for tracking, record keeping, record retention, and surveillance systems. These detailed descriptions relate to retail and medical marijuana at every stage of our delivery business.

SQ Causeway shall maintain records required for a period of Five years and make these records available to the Cannabis Control Commission upon request.

SQ Causeway maintains strict control over records to provide operating data to management, document operations for third-party certifiers or auditors, and to keep a record of operations in case of any insurance claims, legal, or administrative investigation.

The CEO shall oversee all record retention and maintenance activity protocols of SQ Causeway.

SQ Causeway is committed to compliance with all laws and regulations about its operation as a registered organization. Management will make all records available to the CCC or its authorized representatives upon request for monitoring, on-site inspection, and audit purposes.

Several regulations apply to recordkeeping functions. Our recordkeeping policies and Standard Operating Procedures will comply with the Commonwealth's requirements provided in 935 CMR 500.000 but also demonstrate a commitment to full documentation of our operations exceeding the scope of those requirements

SQ Causeway will implement the electronic inventory system approved by the CCC. There are also internal requirements for recordkeeping.

The CEO is responsible for recordkeeping, data retention, and back-ups to ensure SQ Causeway maintains true, complete, and accurate records. The CEO is also responsible for the proper integration of those requirements into policies and Standard Operating Procedures. Back-ups of all records must be maintained for no less than five years.

All delivery agents must adhere to recordkeeping policies and Standard Operating Procedures as a condition of employment. The CEO will authorize the release of any records to a third-party and determine if legal counsel should be consulted.

SQ Causeway shall keep these waste records for at least three years. 935 CMR 500.105(12)

SQ Causeway

Standard Operating Procedures

SQ Causeway shall maintain our records in accordance with generally accepted accounting principles.

SQ Causeway maintains written standard operating procedures shall be maintained as required by 935 CMR 500.105(1).

SQ Causeway maintains company Inventory records as required by 935 CMR 500.105(8).

SQ Causeway shall maintain Seed-to-sale tracking records for all marijuana as required by 935 CMR 500.105(8)(e).

SQ Causeway maintains the following personnel records:

- Job descriptions for each agent;
- A personnel record for each agent.
- A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
- Personnel policies and procedures
- All background check reports obtained in accordance with 935 CMR 500.030.

SQ Causeway maintains the following business records:

- Assets and liabilities
- Monetary transactions
- Books of accounts
- Sales records
- Salary and wages paid to each employee

SQ Causeway

Standard Operating Procedures

Title: Energy Compliance Plan

Effective Date: 12/1/2021

SQ Causeway employs state-of-the-art GPS tracking and driver performance analytics for the most fuel efficient route scheduling in our fleet of delivery vehicles.

SQ Causeway utilizes up to date operational analytics which enable us to optimize fleet decisions.

SQ Causeway intends to use alternative fuel vehicles when possible.

SQ Causeway will regularly evaluate alternative fuel vehicle options and enact fleet changes when possible on an ongoing basis.

SQ Causeway will regularly evaluate new products and technologies which continue to reduce our use of non-alternative vehicles and fuel.

SQ Causeway intends to rent delivery vehicles on a part-time basis and store them off site when not in use. This will greatly reduce traffic to our location and eliminate the need for a garage at the physical facility.

SQ Causeway personnel will be encouraged to work from other locations when legally permissible and job responsibilities allow. This will greatly reduce water and energy consumption at the SQ Causeway facility. It will also eliminate the fuel which would have been used during personnels' regular commute.

SQ Causeway Diversity Plan

Overview: SQ Causeway is dedicated to tangible business practices which promote equity in its operations for diverse populations. To support such populations, SQ Causeway has created the following Diversity Plan.

Goal #1: SQ Causeway will maintain a minimum staffing level of 33% of individuals falling into the below-listed demographics.

- Women
- Minorities
- Veterans
- Persons with disabilities
- LGBTQ+

Program #1: SQ Causeway will list open job postings as monthly advertisements in local publications such as Indeed.com, linkedin.com, The Worcester Telegram & Gazette and Clinton Item, stating that we are specifically looking to hire women, minorities, veterans, LGBTQ+, or persons with disabilities.

Annual Measurement of Goal Completion: SQ Causeway recordkeeping policy mandates that during annual CCC license renewal the CEO certifies and documents that the Diversity Goal of minimum staffing level of 33% of the below listed demographics has been met with the following specific hiring percentage goals:

- Women-30%
- Minorities-30%
- Veterans-20%
- Persons with disabilities-10%
- LGBTQ+-10%

The CEO will count the number of individuals hired who are women, minorities, veterans, LGBTQ+, and persons with disabilities. This number will be assessed from the total number of individuals hired to ensure that 33% of all individuals hired fall within this goal.

Goal # 2: The company will maintain a minimum threshold of management and executive position staffing ratio of 33% of individuals falling into the below-listed demographics. ●

Women

- Minorities
- Veterans
- Persons with disabilities
- LGBTQ+.

Program #2: SQ Causeway will list open job postings as monthly advertisements in local publications such as Indeed.com, linkedin.com, The Worcester Telegram & Gazette and Clinton Item, stating that we are specifically looking to hire women, minorities, veterans, LGBTQ+, or persons with disabilities to work in management and executive positions at SQ Causeway.

Annual Measurement of Goal Completion: SQ Causeway recordkeeping policy mandates that during annual CCC license renewal the CEO certifies and documents that the Diversity Goal of a minimum threshold of management and executive position staffing ratio of 33% has been met with the following specific hiring percentage goals.

- Women-30%
- Minorities-30%
- Veterans-20%
- Persons with disabilities-10%
- LGBTQ+-10%

The CEO will count the number of individuals hired who are women, minorities, veterans, LGBTQ+, and persons with disabilities. This number will be assessed from the total number of individuals hired to ensure that 33% of all individuals hired fall within this goal.

ADDITIONAL REQUIREMENTS TO PLAN

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