



Massachusetts Cannabis Control Commission

Marijuana Cultivator

General Information:

License Number: MC282510
Original Issued Date: 06/05/2020
Issued Date: 06/05/2020
Expiration Date: 06/05/2021

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: J - B.A.M., INC.

Phone Number: 860-402-0605 Email Address: monique2823@gmail.com

Business Address 1: 72 DOWNING PKWY BLDG A Business Address 2:

Business City: Pittsfield Business State: MA Business Zip Code: 01201

Mailing Address 1: P.O. Box 311 Mailing Address 2:

Mailing City: East Otis Mailing State: MA Mailing Zip Code: 01029

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

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

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 50 Percentage Of Control: 50

Role: Owner / Partner Other Role:

First Name: Monique Last Name: Palazzi Suffix:

Gender: Female

User Defined Gender:

What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 50

Percentage Of Control: 50

Role: Owner / Partner

Other Role:

First Name: Brian

Last Name: Palazzi

Suffix:

Gender: Male

User Defined Gender:

What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: Brian

Last Name: Palazzi

Suffix:

Types of Capital: Monetary/
Equity

Other Type of
Capital:

Total Value of the Capital Provided:
\$610603.89

Percentage of Initial Capital:
72

Capital Attestation: Yes

Individual Contributing Capital 2

First Name: Monique

Last Name: Palazzi

Suffix:

Types of Capital: Monetary/
Equity

Other Type of
Capital:

Total Value of the Capital Provided:
\$237924.44

Percentage of Initial Capital:
28

Capital Attestation: Yes

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Brian

Last Name: Palazzi

Suffix:

Marijuana Establishment Name: J – B.A.M., INC.

Business Type: Marijuana Cultivator

Marijuana Establishment City: Pittsfield

Marijuana Establishment State: MA

Individual 2

First Name: Monique

Last Name: Palazzi

Suffix:

Marijuana Establishment Name: J – B.A.M., INC.

Business Type: Marijuana Cultivator

Marijuana Establishment City: Pittsfield

Marijuana Establishment State: MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 71 DOWNING PKWY BLDG A

Establishment Address 2:**Establishment City:** Pittsfield**Establishment Zip Code:** 01201**Approximate square footage of the Establishment:** 16000**How many abutters does this property have?:** 8**Have all property abutters have been notified of the intent to open a Marijuana Establishment at this address?:** Yes**Cultivation Tier:** Tier 01: up to 5,000 square feet**Cultivation Environment:** Indoor**FEE QUESTIONS****Cultivation Tier:** Tier 01: up to 5,000 square feet **Cultivation Environment:** Indoor**HOST COMMUNITY INFORMATION****Host Community Documentation:**

Document Category	Document Name	Type	ID	Upload Date
Community Outreach Meeting Documentation	J - B.A.M., Inc. - Community Outreach Meeting Attestation Form.pdf	pdf	5ddebcd826aa77532085d923	11/27/2019
Certification of Host Community Agreement	HCA- J - B.A.M. - 71 Downing Pkwy.pdf	pdf	5ddecbce7aad8653363bf322	11/27/2019
Plan to Remain Compliant with Local Zoning	Plan to Remain Compliant.pdf	pdf	5ddec63bbcb01253152f8383	11/27/2019
Community Outreach Meeting Documentation	Community outreach attestation – Revised per RFI.pdf	pdf	5e7950f82b97cf38fa373411	03/23/2020

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

PLAN FOR POSITIVE IMPACT**Plan to Positively Impact Areas of Disproportionate Impact:**

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Plan for Positive Impact – Revised per RFI 2.pdf	pdf	5e876d309a385038d9d8a82b	04/03/2020

ADDITIONAL INFORMATION NOTIFICATION**Notification:** I Understand**INDIVIDUAL BACKGROUND INFORMATION****Individual Background Information 1****Role:** Owner / Partner**Other Role:****First Name:** Monique**Last Name:** Palazzi **Suffix:****RMD Association:** Not associated with an RMD**Background Question:** no**Individual Background Information 2****Role:** Owner / Partner**Other Role:****First Name:** Brian**Last Name:** Palazzi **Suffix:****RMD Association:** Not associated with an RMD**Background Question:** no

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	Certificate of Good Standing from MA Secretary of State - J - B.A.M., Inc.....pdf	pdf	5ddaf2d2b4f83557d6cc834b	11/24/2019
Bylaws	By-Laws - J - B.A.M., Inc..pdf	pdf	5ddaf2dc40e348579197e1c4	11/24/2019
Department of Revenue - Certificate of Good standing	Certificate of Good Standing - MA DOR - J - B.A.M., Inc..pdf	pdf	5ddaf2ed8bdcfd57ae5274a9	11/24/2019
Articles of Organization	J - B.A.M., Inc. - Articles of Organization and Articles of Correction.pdf	pdf	5ddaf2f4fd468857b99bdb44	11/24/2019
Department of Revenue - Certificate of Good standing	Dept. of Unemployment attestation – Revised per RFI.pdf	pdf	5e79523a961ad539052bb81c	03/23/2020

No documents uploaded

Massachusetts Business Identification Number: 001383727

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Proposed Timeline	Proposed Operational Timeline.pdf	pdf	5dddc3f4fd468857b99be425	11/26/2019
Business Plan	Business Plan.pdf	pdf	5ddeb2ab26aa77532085d8e6	11/27/2019
Plan for Liability Insurance	Plan to obtain liability insurance – Revised per RFI.pdf	pdf	5e79524d81ed8a355b8d60a6	03/23/2020

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Separating recreational from medical operations, if applicable	Separating Recreational from Medical, not applicable.pdf	pdf	5dddd234d5b0805341c641b9	11/26/2019
Transportation of marijuana	Transport.pdf	pdf	5dddfc3166a32657cfbdd114	11/26/2019
Storage of marijuana	Storage.pdf	pdf	5dddfc52b4f83557d6cc8c8e	11/26/2019
Qualifications and training	Qualifications and Training.pdf	pdf	5dddfcc4ea4df3530e646980	11/26/2019
Restricting Access to age 21 and older	Restricting access to age 21 and up.pdf	pdf	5dddfd31bcb01253152f8189	11/26/2019
Quality control and testing	Quality Control and Testing.pdf	pdf	5dddfdc674bb15534cd4e8c8	11/26/2019
Record Keeping procedures	Record Keeping.pdf	pdf	5dddfdc766a32657cfbdd118	11/26/2019
Maintaining of financial records	Maintenance of Financial Records.pdf	pdf	5dddf08160e3b57a3dd45e7	11/26/2019

Personnel policies including background checks	Personnel and Background Checks.pdf	pdf	5dddff118bdcfd57ae527dac	11/26/2019
Policies and Procedures for cultivating.	Policies and Procedures for Cultivation.pdf	pdf	5dddff987aad8653363bf183	11/26/2019
Prevention of diversion	Prevention of Diversion.pdf	pdf	5dddff9ba9ef3857c445ba0e	11/26/2019
Dispensing procedures	Dispensing.pdf	pdf	5dde003f170b4c5353e3c49a	11/26/2019
Inventory procedures	Inventory.pdf	pdf	5dde004240e348579197ea9b	11/26/2019
Security plan	Security Plan with Cash Handling – Revised per RFI.pdf	pdf	5e876d6a2eba6d38ef16548a	04/03/2020
Diversity plan	Diversity Plan – Revised per RFI 2.pdf	pdf	5e948c3f9a385038d9d8c34b	04/13/2020

ATTESTATIONS

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

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

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

Notification: I Understand

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

Monday From: 9:00 AM	Monday To: 7:00 PM
Tuesday From: 9:00 AM	Tuesday To: 7:00 PM
Wednesday From: 9:00 AM	Wednesday To: 7:00 PM
Thursday From: 9:00 AM	Thursday To: 7:00 PM
Friday From: 9:00 AM	Friday To: 7:00 PM
Saturday From: 9:00 AM	Saturday To: 7:00 PM
Sunday From: 9:00 AM	Sunday To: 7:00 PM

Date generated: 12/03/2020

Page: 5 of 5

Community Outreach Meeting Attestation Form

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

I, Monique Palazzi, (*insert name*) attest as an authorized representative of J - B.A.M., Inc. (*insert name of applicant*) that the applicant has complied with the requirements of 935 CMR 500 and the guidance for licensed applicants on community outreach, as detailed below.

1. The Community Outreach Meeting was held on July 5, 2019 (*insert date*).
2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on June 27, 2019 (*insert date*), which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A (*please clearly label the newspaper notice in the upper right hand corner as Attachment A and upload it as part of this document*).
3. A copy of the meeting notice was also filed on June 26, 2019 (*insert date*) with the city or town clerk, the planning board, the contracting authority for the municipality, and local licensing authority for the adult use of marijuana, if applicable. A copy of the municipal notice is attached as Attachment B (*please clearly label the municipal notice in the upper right-hand corner as Attachment B and upload it as part of this document*).
4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on June 26, 2019 (*insert date*), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (*please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee*).

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

COMMUNITY OUTREACH PUBLIC NOTICE

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Cultivation Establishment is scheduled for **Friday, July 5, 2019 at 6:00 p.m. at Framework Pittsfield Coworking, 437 North Street, Pittsfield, MA 01201.** The proposed Marijuana Cultivation Establishment is anticipated to be operated by J - B.A.M., Inc. and to be located at 71 Downing Parkway, Pittsfield, MA 01201. There will be an opportunity for the public to ask questions.

06/27/19

COMMUNITY OUTREACH PUBLIC NOTICE

RECEIVED-CITY CLERK
CITY OF PITTSFIELD, MA
2019 JUN 26 PM 3:56

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Cultivation Establishment is scheduled for Friday, July 5, 2019 at 6:00 p.m. at Framework Pittsfield Coworking, 437 North Street, Pittsfield, MA 01201. The proposed Marijuana Cultivation Establishment is anticipated to be operated by J - B.A.M., Inc. and to be located at 71 Downing Parkway, Pittsfield, MA 01201. There will be an opportunity for the public to ask questions.

J - B.A.M., Inc.
c/o Cain Hibbard & Myers, PC
66 West Street
Pittsfield, MA 01201

June 26, 2019

VIA FIRST CLASS MAIL



Re: *Notice to Abutters of Proposed Marijuana Cultivation Establishment*

Dear Property Owner:

This letter is being sent to you as an abutter of a proposed marijuana cultivation establishment at 71 Downing Parkway, Pittsfield, Massachusetts.

Enclosed is a copy of a notice which appeared in the *Berkshire Eagle* on June 27, 2019 giving notice of a community outreach meeting scheduled for July 5, 2019 at 6:00 p.m. at the Berkshire Athenaeum, 1 Wendell Avenue, Pittsfield.

Community members will be permitted and are encouraged to ask questions and receive answers from representatives of J - B.A.M., Inc.

Thank you.

Very truly yours,

J - B.A.M., Inc.
By its attorneys
Cain Hibbard & Myers, PC

A handwritten signature in cursive script, appearing to read "F. Sydney Smithers".

F. Sydney Smithers, Esq.
Enclosure

cc: Monique Palazzi

REDACTED

RECREATIONAL ADULT USE HOST COMMUNITY AGREEMENT

This HOST COMMUNITY AGREEMENT ("Agreement") is entered into as of November 19th, 2019 ("Effective Date") by and between J - B.A.M., Inc. with its main office presently located at 71 Downing Parkway, Pittsfield, MA 01201 ("J - B.A.M."), and the City of Pittsfield, a municipal corporation validly existing under the laws of the Commonwealth of Massachusetts, with a principal place of business at 70 Allen St, Pittsfield, MA 01201 (the "City"). Collectively, J - B.A.M. and the City may be referred to as "Parties".

PRELIMINARY STATEMENT

The Massachusetts Cannabis Control Commission ("CCC") has granted, or is expected to grant, J - B.A.M. a license to operate a Marijuana Cultivator ("MC") at a property located at 71 Downing Parkway, Pittsfield, MA 01201 ("Premises").

J - B.A.M., upon being granted an Approval to cultivate by the CCC and all other required permits, licenses and approvals from the City to begin cultivation of adult-use marijuana in compliance with 935 CMR 500, agrees to pay certain community impact fees to the City in order to provide financial resources to be used for the betterment of the City as determined by the City in its sole discretion.

Section 25 of Chapter 55 of the Acts of 2017, styled "An Act to Ensure Safe Access to Marijuana", provides that "[a]n agreement between a . . . medical marijuana treatment center and a host community may include a community impact fee for the host community, provided, however that the community impact fee shall be reasonably related to the costs imposed upon the municipality by the operation of the establishment and shall, in no event, amount to more than 3 percent of the gross sales of the establishment or be effective for longer than 5 years."

Section 25 of Chapter 55 of the Acts of 2017 further provides that "[a]ny cost to a city or town imposed by the operation of marijuana establishment shall be documented and considered a public record as defined by clause Twenty-sixth of section 7 of chapter 4 of the General Laws."

AGREEMENT

NOW THEREFORE, in consideration of the provisions of this Agreement and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, J - B.A.M. offers and the City accepts this Agreement in accordance with M.G.L. c. 44, § 53A, and the Parties hereby agree as follows:

1. Host Community Fees. The parties stipulate and agree that the City will incur additional expenses and impacts upon the City's road system, law enforcement, fire protection services, inspectional services, permitting services and public health services. Accordingly, in order to mitigate any such impacts upon the City and use of City resources, J - B.A.M. shall pay fees to the City, on a biannual basis, as follows:

- i. for cultivators in state license tier 1 – 3, an amount equal to Ten Thousand Dollars (\$10,000);
 - b. The initial payment of the Host Community Fee to the City shall be made on or before the first of July or January, whichever occurs first, following the end of the first six (6) months from the day J - B.A.M. receives its authorization from the CCC to commence operations from the Premises (“Commence Operations”). Thereafter, Host Community Fee payments shall be made to the City on or before the first of July and the first of January each year. J - B.A.M. shall notify the City when it Commences Operations within the City at the Premises. The Host Community Fee shall continue being paid by J - B.A.M. to the City, until J - B.A.M. ceases business operations at the Premises or upon the expiration of Five (5) years after it Commences Operations, whichever is earlier. While the purpose of the Host Community Fee is to assist the City in addressing any public health, safety or other effects or impacts the Premises may have on the City, the City may expend all such fees at the City’s sole and absolute discretion.
2. Local Preference. Except for senior management positions, J - B.A.M. commits to hiring the majority of its employees from the local communities, to the extent permitted by law. In addition to the direct hiring, J - B.A.M. will work in a good faith, legal and non-discriminatory manner to hire local vendors, suppliers, contractors and builders from the Pittsfield area where possible.
3. Property Taxes. Except as provided in section 44 of Chapter 55 of the Acts of 2017, at all times during the Term of this Agreement, all property, both real and personal, owned or operated by J - B.A.M. shall be treated as taxable, and all applicable real estate and personal property taxes for that property shall be paid either directly by J - B.A.M. or by its landlord to the City, and J - B.A.M. shall not object to or otherwise challenge the taxability of such property and shall not seek a non-profit exemption from paying such taxes. Notwithstanding the foregoing, (i) if real or personal property owned or operated by J - B.A.M. is determined to be non-taxable or partially non-taxable, a determination of which the J - B.A.M. agrees not to seek at any time during this Agreement or (ii) if J - B.A.M. is determined to be entitled or subject to exemption with the effect of reducing or eliminating the tax which would otherwise be due if not so exempted, then J - B.A.M. shall pay, as an additional fee to the City, an amount which when added to the taxes, if any, paid on such property, shall be equal to the taxes which would have been payable on such property at fair cash value and at the otherwise applicable tax rate, if there had been no abatement or exemption (“Additional Fee”). Such Additional Fee payments shall be in addition to all payment obligations owed by J - B.A.M. under Section 1 of this Agreement.
4. Right to Re-Open.
 - a. In the event that J - B.A.M. enters into a host community agreement or other similar agreement with another municipality in the Commonwealth of Massachusetts that contains financial terms more beneficial to such municipality

than this Agreement provides to the City, taking into consideration the marketplace, number of other operating adult-use marijuana facilities and customers in the municipality as compared to the City, J - B.A.M. agrees to reopen this Agreement and, in good faith, negotiate an amendment that fairly adjusts the Host Community Fee set forth in this Agreement to reflect any such better terms.

- b. If, during the term of this Agreement, the Host Community Fees imposed upon J - B.A.M. under this Agreement are determined to exceed the costs imposed upon the City by the operation of the Premises, then the City agrees to reopen this Agreement and, in good faith, negotiate an amendment that fairly adjusts the Host Community Fee such that the fee is reasonably related to the costs imposed upon the City due to J - B.A.M.'s operation of the Premises.
5. Permits and Licenses. The Parties agree that this Agreement and all terms, conditions and requirements contained herein, are subject to, and conditioned upon J - B.A.M. obtaining the required registrations, permits and licenses to operate adult-use marijuana establishment at the Premises. If, for any reason, J - B.A.M. is unable to obtain the required permits and licenses to operate, this Agreement shall be null and void and neither Party shall have any further obligations under this Agreement.
6. Omitted.
7. Term. This Agreement shall go into effect on the Effective Date and shall terminate in the event that J - B.A.M. ceases its MC operations in the City or J - B.A.M.'s MC license is revoked by the CCC. This Agreement shall terminate upon the occurrence or existence of the appointment of a trustee, receiver or other custodian for any substantial part of J - B.A.M.'s assets, or if J - B.A.M. petitions for, permits or suffers insolvency, bankruptcy, liquidation or a winding up of its business or assets. Furthermore, in accordance with section 25 of Chapter 55 of the Acts of 2017, this Agreement shall terminate no later than Five (5) years after the J - B.A.M. Commences Operations at the Premises. In the event of termination, payments due in that Six (6) month period shall be prorated based on the number of days of operation during said Six (6) month period.
8. Local Authority. This Agreement does not waive, limit, control, govern or in any way describe the legal authority of any City board, commission, committee, officer or official to regulate, authorize, restrict, inspect, investigate, enforce against, or issue, deny, suspend or revoke any permit, license or other approval with respect to, J - B.A.M., the Premises or any MC thereon; nor does it waive, limit, control, govern or in any way describe the legal authority of the Pittsfield Police Department to investigate, prevent or take action against any criminal activity with respect to J - B.A.M., the Premises or any MC thereon. Nothing in this Agreement presumes, implies, suggests or otherwise creates any promise either that J - B.A.M. shall obtain or retain any or all local permits, licenses and other approvals that are required in order to operate an MC at the Premises, or that

the City shall be required to support or assist in any application for the same. The City, by entering into this Agreement is not thereby required or obligated to issue such permits and approvals as may be necessary for the MC to operate in the City, or to refrain from enforcement action against J - B.A.M. and/or the Premises for violations of the terms of said permits, approvals and or applicable statutes, ordinances and regulations. The City acknowledges that J - B.A.M. may now or in the future enjoy certain rights under the laws of the Commonwealth, and in further consideration of the payments contemplated under this Agreement the City agrees that it will refrain from imposing any restrictions on J - B.A.M.'s exercise of any rights that may arise solely under such laws. Notwithstanding any other provision of this Section 8, the City hereby acknowledges that J - B.A.M.'s obligations under this Agreement are contingent upon J - B.A.M.'s successful and timely operation of its business, and the City therefore agrees to promptly provide J - B.A.M. with a certificate of occupancy for the entirety of the Premises upon J - B.A.M.'s substantial completion of the permitted work at the Premises.

9. Common Agreement. No MC or marijuana establishment shall sell or otherwise distribute within the City adult-use marijuana or adult-use marijuana infused products, including any products containing or consisting of THC or CBD, unless and until such MC or marijuana establishment has entered into a Host Community Agreement with the same terms, conditions and restrictions as appear within this Agreement. For the avoidance of doubt, the City agrees and acknowledges that it will impose upon any MC or marijuana establishment operating within the City the same financial and other obligations set forth in this Agreement.
10. Notices. Any and all notices or other communications required or permitted under the Agreement by either Party to the other shall be in writing and delivered by mail, postage prepaid, return receipt requested, by registered or certified mail, or by other reputable delivery service.

- a. Notice to J - B.A.M. shall be delivered to:

J - B.A.M., Inc.
71 Downing Parkway
Pittsfield, MA 01201

with a copy to:

F. Sydney Smithers, Esq.
Cain Hibbard & Myers PC
66 West Street, Suite 300
Pittsfield, MA 01201

- b. Notice to City shall be delivered to:


City of Pittsfield

Mayor's Office
70 Allen St
Pittsfield, MA 01201

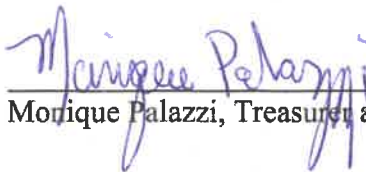
11. Entire Agreement. This Agreement supersedes any and all other agreements, either oral or in writing, between the Parties hereto with respect to the subject matter of this Agreement. This Agreement may not be changed verbally, and may only be amended by an agreement in writing signed by both Parties.
12. No Rights in Third Parties. This Agreement is not intended to, nor shall it be construed to, create any rights in any third parties.
13. Governing Law. This Agreement shall be governed by and construed in accordance with the laws of the Commonwealth of Massachusetts.
14. Severability. If any provision of this Agreement shall be held by a court of competent jurisdiction to be contrary to law, that provision will be enforced to the maximum extent permissible and the remaining provisions of this Agreement will remain in full force and effect, unless to do so would result in either Party not receiving the benefit of its bargain.
15. Successors. This Agreement shall be binding upon and shall inure to the benefit of the Parties, their respective heirs, executors, administrators and assigns.
16. Assignment. Neither Party may assign this Agreement without the prior written consent of the other Party.
17. Acknowledgement. The individuals signing below have full authority to do so by the entity on behalf of which they have signed.

IN WITNESS WHEREOF the parties hereto have caused this Agreement to be duly executed as of the Execution Date set forth above.

CITY OF PITTSFIELD


Linda M. Tyer, Mayor

J- B.A.M., INC.


Monique Palazzi, Treasurer and Secretary

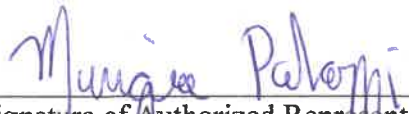
8/29/19
Date

Host Community Agreement Certification Form

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


Applicant

I, Monique Palazzi, (*insert name*) certify as an authorized representative of J - B.A.M., Inc. (*insert name of applicant*) that the applicant has executed a host community agreement with the City of Pittsfield (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on 11/19/2019 (*insert date*).


Signature of Authorized Representative of Applicant
Monique Palazzi, Treasurer of J - B.A.M., Inc.

Host Community

I, Linda M. Tyer, Mayor, (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for City of Pittsfield (*insert name of host community*) to certify that the applicant and City of Pittsfield (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on 11/19/2019 (*insert date*).


Signature of Contracting Authority or
Authorized Representative of Host Community

J – B.A.M., INC. Plan to Remain Compliant with Local Zoning

J – B.A.M., INC. intends to remain compliant with local zoning and procedures. As evidence of this intention, after having had preliminary meetings to explain the cultivation project in front of local City offices and Departments, J – B.A.M., INC. has signed a host community agreement with the City of Pittsfield, and has been approved for site plan by the Community Development Board of the City as well. Thus far, J – B.A.M., INC has established current compliance with all local zoning, evidenced further by their reaching out to The City Planner of Pittsfield in order to revise their site plan to remove a perimeter fence. These documents have been included and follow this page.

After receipt of Provisional Certificate of Registration the company will continue in its efforts to work with the City of Pittsfield with regards to local zoning and procedures for building, construction, and operations. J – B.A.M., INC will consult Legal Counsel and the appropriate City Offices and Departments first and foremost when handling any and all issues regarding City bylaws, codes, regulations, and processes. J – B.A.M., INC. also plans to attend and participate in every local meeting that regards local regulatory affairs pertaining to the company. The ownership along with the help and guidance of both the City and Local Legal Counsel will become very familiar with any portion of the law that may affect their initiatives, and also keep abreast of any changes to the existing regulatory framework with regards to local zoning and procedures, and then make appropriate decisions based on that information, with only the full endorsement of the relevant City offices, officials, or departments.



RECEIVED-CITY CLERK
CITY OF PITTSFIELD, MA
2019 SEP -4 PM 1:56

CITY OF PITTSFIELD

DEPARTMENT OF COMMUNITY DEVELOPMENT, CITY HALL, 70 ALLEN STREET, RM 205, PITTSFIELD, MA 01201
TEL. (413) 499-9368 – FAX: (413) 395-0152

MINUTES COMMUNITY DEVELOPMENT BOARD TUESDAY, AUGUST 20, 2019 6:00 P.M. – CITY HALL, COUNCIL CHAMBERS

Chair Irvin called the meeting to order at 6:00 p.m. Those in attendance are noted below.

Chair Irvin informed all in attendance that according to MGL, your voices are being recorded and your picture is being taken.

ROLL CALL:

Board Members Present:

Sheila Irvin, Chair
Libby Herland
Floriana FitzGerald

Board Members Absent:

Matthew Herzberg
Paul Saldana
Cynthia Brown
Gary Levante

A quorum was present.

Staff:

CJ Hoss, City Planner
Ted Kozlowski, Board Clerk

MINUTES:

1. July 8, 2019

Ms. FitzGerald made a motion to accept the minutes as presented; it was seconded by Ms. Herland and was approved unanimously.

2. July 25, 2019

Ms. FitzGerald made a motion to accept the minutes as presented; it was seconded by Ms. Herland and was approved unanimously.

ZONING:

1. **Site Plan Review** – An application from the Pediatric Development Center for approval under Section 7.816 (Health Care Center) for property located at 388 Columbus Avenue Extension. The proposal amends previous approvals in relation to the use of the site to allow for a proposed building addition. The Zoning Board of Appeals is the Special Permit Granting Authority under Section 7.816. (Assessor map G9-1-20)

Kerry Bartini, Berkshire Design Group came forward to speak on the application. Back in 2014 PDC had applied for and been granted a special permit to do an addition off the rear of the building. They were not able to act at the time. The existing plan is a 2-story structure. They are proposing to extrude the back out into the parking lot. There is an existing ramp and rear entry that will be demolished. In its place they will create some administrative offices and a new handicap accessible ramp. The structure of the building remains the same. The addition will not impede any traffic flow; lighting will remain the same. They will have 19 parking spots; traffic will remain the same with no new curb cuts. It will increase about 474sqft. They do not intend to increase employees, it is to accommodate the staff they currently have.

Seeing no further debate or discussion, Ms. FitzGerald made a motion to approve the site plan review and recommend acceptance by the ZBA with the condition noted below; it was seconded by Ms. Herland and was approved unanimously.

- The applicant would be subject to all other federal, state and local rules and regulations not specifically covered by the granting of a site plan review.

2. **Public Hearing – Site Plan Review/Special Permit Approval** – An application from True East Leaf for approval under Section 7.850 (Marijuana Retail) and 7.853 (Marijuana Cultivation) for property located at 161 Seymour Street for the operation of a marijuana retail and cultivation business. The proposed use does not meet the City's off-street parking requirements, so also requires a special permit under Section 10.110f to waive the off-street parking requirements. The Zoning Board of Appeals is the Special Permit Granting Authority under Section 7.850 and 7.853. (Assessor map H11-1-13)

Chair Irvin noted there are not enough votes tonight to have a full hearing. They are recommending a continuance to the September 3 meeting.

Seeing no further debate or discussion, Ms. FitzGerald made a motion to continue the item to the September 3, 2019; it was seconded by Ms. Herland and was approved unanimously.

3. **Site Plan Review/Approval** – An application from Northeast Cultivation LLC for approval under Section 7.854 (Marijuana Cultivation) for property located at 997 Pecks Road for the development of an outdoor Marijuana Cultivation facility. The Zoning Board of Appeals is the Special Permit Granting Authority under Section 7.854. (Assessor map E17-1-101)

Sarah Gapinski, SK Design came forward to speak on the application. It is 19 acres of agricultural farm with single family homes along Pecks Rd. The property contains a 2,000sqft

pole barn. Most of the site is open meadow. The proposed use is a 6.7 acre outdoor marijuana cultivation facility. Plants will be grown in bags on the ground throughout the lot, about 100,000sft of space total. The barn will be reused for drying and manufacturing. Next to the barn will be holding containers to hold product prior to shipping. They propose some greenhouses for future use of anticipated under-cover growing. They will need to install a new water line from Pecks to the barn and a couple of water tanks for irrigation during the summer months. Parking is adjacent to the barn and will accommodate about 20 spaces for about 30 employees during the growing months and the harvest season. There will be a 6ft high chain link fence with video surveillance in accordance with CCC regulations. There will be no signage other than Do Not Trespass signs as regulated by the CCC. A dumpster will be next to the barn. The site is lower than Pecks Rd and cannot be seen from Pecks. The houses, vegetation and topography make the property well hidden. The fire department requested access along the eastern and northern sides; they are amenable to that. It is not shown on the submitted plan.

Ms. FitzGerald asked if the greenhouses are currently there. Two will be constructed in the future, as needed, all within the fenced area. The barn is sided with doors.

Ms. FitzGerald asked about visibility. The site is in a valley, about 15ft down. Driving down Pecks Rd you do not see much of anything.

Ms. Herland had a concern about the storage containers and their visibility. But since the barn is sided, they probably would not be visible.

Ms. Herland asked if abutter meetings have happened. The applicant went door to door and they had an abutters meeting. There were no questions or problems. Mr. Hoss noted there was one neighbor that had a concern and will probably be at the ZBA meeting. He was unsure what the neighbor's concern is.

Ms. FitzGerald asked about smell. Neighbors would smell it as a nuisance for a couple weeks.

Seeing no further debate or discussion, Ms. Herland made a motion to endorse the site plan and recommend approval by the ZBA with the condition noted below; it was seconded by Ms. FitzGerald and was approved unanimously.

- The applicant would be subject to all other federal, state and local rules and regulations not specifically covered by the granting of a site plan review.
4. **Site Plan Approval** – An application from J-BAM, Inc. under Section 7.735 (Marijuana Cultivation) for property located at 71 Downing Parkway for the operation of an indoor cultivation facility within the former Coca-Cola warehouse. (Assessor Map M12-1-411)

Atty Syd Smithers, Cain Hibbard & Myers came forward to speak on the application. The site is an indoor facility on land zoned IG, previously a Coca-Cola facility. There are no exterior changes except for a perimeter fence. If you look at the plan, it is tinted in two colors, gray and tan. Tan is a gravel parking lot which will not be rented to the applicant. Only the blacktop portion and 16,000sft of the warehouse will be rented. Under the criteria, the project complies with Sections 7.3 and 7.735 of the Zoning Ordinance.

Sarah Gapinski, SK Design Group came forward to speak on the application. It is a 3.4 acre facility. Most of the site is developed with adequate parking and turnaround space. The space will be divided; 16,000sft for the applicant's and 4,000 for the landlord's business. The floorplan was included. The marijuana will be grown hydroponically, with manufactured modules brought in and installed. Most of the site will remain unchanged. There will be a secure fence with a lockbox, which the Fire Department requested. There will be a reduction of parking. There are 29 spots and only 18 are required; they will be converting 2 of the spaces into handicapped parking. There is an existing free-standing sign that the landlord will retain. The applicant will install a business sign on the gate and No Trespassing signs on the fencing. Surveillance will be installed with down casting lighting, per the CCC requirements. There will not be doing any landscaping. There are trees and shrubbery currently on the border of the neighbor. The building is connected to public utilities with coordination with city engineers. The dumpster will be inside the building. The Fire Department reviewed the application and they requested some of the cars currently on the paved area be removed for emergency access.

Seeing no further debate or discussion, Ms. FitzGerald made a motion to approve the site plan with the conditions noted below; it was seconded by Ms. Herland and was approved unanimously.

- Department of Community Development staff shall not authorize building permits related to this project until the execution of a Community Host Agreement.
- The applicant is subject to all other federal, state, and local rules and regulations not specifically covered by the granting of this special permit.

ADMINISTRATION:

1.New Business

Mr. Hoss noted there are a few continued applications and possibly a new one. Updates from Proprietor's Lodge, the Seymour St public hearing and the Barker Rd solar.

2.Old Business

- **Site Plan Review/Approval (Continuation from June 4, 2019)** – An application from Guild Solar LLC for approval under Section 7.824 (Public or Quasi Public Utility) for property located on Gamwell Avenue for the development of a 4mW solar facility. The Zoning Board of Appeals is the Special Permit Granting Authority under Section 7.824. (Assessor map G6-2-34, G6-2-35, G7-1-20) *The applicant has requested a continuance to September Community Development Board and Zoning Board of Appeals meetings.*

No one came forward to speak on the application. The applicant has requested a continuance to September Community Development Board and Zoning Board of Appeals meetings.

Mr. Hoss noted he believes the applicant should be ready to proceed at the September meeting.

Seeing no further debate or discussion, Ms. FitzGerald made a motion to continue the item to the September 3, 2019 meeting; it was seconded by Ms. Herland and was approved unanimously.

3.Reports from staff or members of the Board

None.

4.Adjournment

Ms. FitzGerald made a motion to adjourn at 6:30pm; it was seconded by Ms. Herland and was approved unanimously.

Submitted by Ted Kozlowski, Board Clerk



CITY OF PITTSFIELD

DEPARTMENT OF COMMUNITY DEVELOPMENT, CITY HALL, 70 ALLEN STREET, RM 205, PITTSFIELD, MA 01201

November 21, 2019

Monique Palazzi, Vice President
J-BAM, Inc.
PO Box 311
East Otis, MA 01029

Re: 71 Downing Industrial Parkway

Dear Ms. Palazzi,

We are in receipt of your letter dated September 3, 2019 regarding your proposed project at 71 Downing Industrial Parkway.

Staff has reviewed the revised plans that include the elimination of the proposed perimeter fence. Our opinion is that the proposed change is consistent with the original approval and does not require an amendment to the site plan approval issued by the Community Development Board at their meeting on August 20, 2019.

Sincerely,

A handwritten signature in black ink, appearing to read "Cornelius Hoss", is written over a faint, circular official stamp.

Cornelius Hoss
City Planner

Community Outreach Meeting Attestation Form

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

I, Monique Palazzi, (insert name) attest as an authorized representative of J - B.A.M., Inc. (insert name of applicant) that the applicant has complied with the requirements of 935 CMR 500 and the guidance for licensed applicants on community outreach, as detailed below.

1. The Community Outreach Meeting was held on July 5, 2019 (insert date).
2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on June 27, 2019 (insert date), which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A (please clearly label the newspaper notice in the upper right hand corner as Attachment A and upload it as part of this document).
3. A copy of the meeting notice was also filed on June 26, 2019 (insert date) with the city or town clerk, the planning board, the contracting authority for the municipality, and local licensing authority for the adult use of marijuana, if applicable. A copy of the municipal notice is attached as Attachment B (please clearly label the municipal notice in the upper right-hand corner as Attachment B and upload it as part of this document).
4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on June 26, 2019 (insert date), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee).

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

An evil vintage doll makes her return

[illegible]

with a very complicated plotline, ended Performing properly by the grand band in history to a world that has never heard them, and with a little help from his steel-hearted American agent, Debra (Kate McKinnon), Jack's fierce exploits. But in his first scene, he's playing the role of a person who always believed in him: With Ed Sheeran, *Ames*, Laraine Marla 1 hour, 50 minutes, PG / BM / TC / TM

Classifieds

[illegible]

COMMUNITY OUTREACH PUBLIC NOTICE

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Cultivation Establishment is scheduled for **Friday, July 5, 2019 at 6:00 p.m. at Framework Pittsfield Coworking, 437 North Street, Pittsfield, MA 01201.** The proposed Marijuana Cultivation Establishment is anticipated to be operated by J - B.A.M., Inc. and to be located at 71 Downing Parkway, Pittsfield, MA 01201. There will be an opportunity for the public to ask questions.

06/27/19

COMMUNITY OUTREACH PUBLIC NOTICE

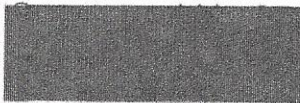
RECEIVED-CITY CLERK
CITY OF PITTSFIELD, MA
2019 JUN 26 PM 3:56

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Cultivation Establishment is scheduled for Friday, July 5, 2019 at 6:00 p.m. at Framework Pittsfield Coworking, 437 North Street, Pittsfield, MA 01201. The proposed Marijuana Cultivation Establishment is anticipated to be operated by J - B.A.M., Inc. and to be located at 71 Downing Parkway, Pittsfield, MA 01201. There will be an opportunity for the public to ask questions.

J - B.A.M., Inc.
c/o Cain Hibbard & Myers, PC
66 West Street
Pittsfield, MA 01201

June 26, 2019

VIA FIRST CLASS MAIL



Re: *Notice to Abutters of Proposed Marijuana Cultivation Establishment*

Dear Property Owner:

This letter is being sent to you as an abutter of a proposed marijuana cultivation establishment at 71 Downing Parkway, Pittsfield, Massachusetts.

Enclosed is a copy of a notice which appeared in the *Berkshire Eagle* on June 27, 2019 giving notice of a community outreach meeting scheduled for July 5, 2019 at 6:00 p.m. at the Berkshire Athenaeum, 1 Wendell Avenue, Pittsfield.

Community members will be permitted and are encouraged to ask questions and receive answers from representatives of J - B.A.M., Inc.

Thank you.

Very truly yours,

J - B.A.M., Inc.
By its attorneys
Cain Hibbard & Myers, PC

A handwritten signature in cursive script, appearing to read "F. Sydney Smithers".

F. Sydney Smithers, Esq.
Enclosure

cc: Monique Palazzi

REDACTED

Plan for Positive Impact

In order to positively impact the disproportionately affected areas of Massachusetts, the Company plans to create an educational initiative and a job training program. We are located in the City of Pittsfield and understand that Pittsfield is one of the Commission's defined twenty-nine areas of disproportionate impact. Our efforts to positively impact the disproportionately affected areas of Massachusetts will focus on bolstering our local community of Pittsfield Massachusetts.

Goals

J-B.A.M. intends to devote its resources to create and develop beneficial programs centered on issues which it holds dear to its heart. These programs include educational seminars and job training sessions. As our facility is located in Pittsfield, within an area of disproportionate impact, we believe our own hiring practices will focus on hiring a workforce from the disproportionately impacted area of Pittsfield. In addition, the company will provide educational seminars and job training to the citizens of Pittsfield who are non-employees of the company. In order to avoid the issue of improper promotion or advertising, J-B.A.M. will retain anonymity in its relationship to these programs, instead they will be offered as Pittsfield Community Job Training and Educational Seminars.

Programs

J-B.A.M. recognizes that the growth of the marijuana program in Massachusetts will raise a number of questions and concerns within the community at-large. To address these concerns, the Company will offer public education seminars, to up to 30 individuals, in order to provide an opportunity for local community members to learn more about cannabis. These free seminars will be open to the public, take place on a Saturday or Sunday and last for 3 hours. The educational seminars will take place semiannually and be located off of the Company's premises. Seminars will include lectures by the Company's executive staff and employees that will inform the community on the facts surrounding the company's activities, cannabis use, and the industry at large, and will address misconceptions or fears that many may have concerning the Company's community presence. The dates and times of the seminars will be posted in the Berkshire Eagle the week prior to the event.

The executive management team of the company will develop its education and training seminars in order to ensure a comprehensive education useful to the public who are concerned about the industry's impact on the community or interested in taking part and being involved in the industry. Our job training programs will take place in the city of Pittsfield, an area of disproportionate impact. Not only will we encourage candidates in our job training program to fill positions at our own facility, we aim to help candidates find open gainful employment in the cannabis industry. The aim of the programs is to prepare non-employees of the company for gainful employment in the marijuana industry. We will further their chances of job placement by providing letters of recommendation and references attesting to their learned skills. Every individual that attends and completes the job trainings will fill out a contact form and waiver that will allow the company to follow up on the careers of these individuals and assess the impact of our training program.

J-B.A.M. intends to hold job training sessions semiannually or to meet the demands of the industry and the job market. The training sessions will be an intensive two-day weekend course from 10-5 on a consecutive Saturday and Sunday with lunch provided. The company will begin this process immediately on licensure. Documentation of each event, along with the proposed syllabus and any relevant materials shall be made available to the commission. At minimum,

Job Training events will be posted each week, for two weeks prior to the event in the local publication: The Berkshire Eagle. Specific populations of disproportionately affected area of Pittsfield will be targeted through publication, monthly until at least 20 spots are filled, of the job training program in local newspapers, such as the Berkshire Eagle, and community bulletins. In order to positively impact the disproportionately affected we will give selection preferences to those who fall into the following enumerated categories;

- ☐ Past or present residents of Pittsfield (where the company is headquartered), a geographic “areas of disproportionate impact,” which has been defined by the Commission and identified in its Guidance for Identifying Areas of Disproportionate Impact;
- ☐ Individuals, or individuals with spouses or parents, with past drug convictions, or;

Our Job training program shall provide opportunities to those who are interested in a career in the cannabis industry. While these programs are not meant to replace the mandated Responsible Vendor Training program, the lectures should allow candidates to better grasp the nuances of the industry and familiarize themselves with what is expected of them and the industry-standard protocols for achieving those goals.

Measurements

The Company intends to begin its community impact initiative beginning on the date of licensure and hopes to achieve the following one-year targets near the time for the renewal of the license:

1. J-B.A.M. hopes to hold at two educational seminars and two job training sessions within the first year of operation. The educational seminars will be open to at least 30 people. The job training sessions will graduate at least 20 trainees.
2. The company intends most, 50%, of its own workforce to fall into one of the enumerated categories above, as the facility is located within an area of disproportionate impact.
3. Similarly, the majority of applicants for the job training program will be comprised of the enumerated categories.

The job training program will be advertised locally in the area of disproportionate impact, through the use of newspapers and bulletin boards. The trainee class will be comprised of a majority of individuals from the aforementioned enumerated categories. Though, in order to quantitatively show progress in furthering the goal of positively impacting the disproportionately affect areas of Massachusetts the company shall grade its own efforts and provide documentation to the commission with the following information.

- Number of individuals hired and retained as employees at J-B.A.M.
- Number of individuals trained from the enumerated categories and overall.
- Number of individuals that attended the training that achieved gainful employment in the cannabis industry within 1 year from completing training from the enumerated categories and overall.
- Number and subject matter of job trainings offered and performed by our program.

J-B.A.M. has a plan to positively impact the disproportionately affected areas of Massachusetts by responding to the needs of the Pittsfield community, where the company is located. Our efforts in job growth and industry specific-training as well as seminars which

educate concerned and/or interested citizens about the practices of such a company in their community are the ways that J-B.A.M. will serve the Pittsfield Community.

The Company will adhere to the requirements set forth in 935 CMR 500.105(4), providing that the Company shall not engage in any prohibited advertising, branding, marketing, or sponsorship practices. The Company will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.



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

William Francis Galvin
Secretary of the
Commonwealth

Date: October 31, 2019

To Whom It May Concern :

I hereby certify that according to the records of this office,
J - B.A.M., INC.

is a domestic corporation organized on **May 14, 2019** , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



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

William Francis Galvin

Secretary of the Commonwealth

Certificate Number: 19100690640

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

Processed by:

BY-LAWS
OF
J – B.A.M., INC.

1. MEETINGS OF SHAREHOLDERS.

1.1 Annual Meeting. The Corporation shall hold an annual meeting of shareholders on the third Monday in February of each year or at such other time within six months after the end of the Corporation's fiscal year as shall be fixed by the Directors. The purposes for which the annual meeting is to be held, in addition to those prescribed by the Articles of Organization, shall be for electing directors and for such other purposes as shall be specified in the notice for the meeting, and only business within such purposes may be conducted at the meeting. In the event an annual meeting is not held at the time fixed in accordance with these By-Laws or the annual meeting is not held within 13 months after the last annual meeting was held, the Corporation may designate a special meeting held thereafter as a special meeting in lieu of the annual meeting, and the meeting shall have all of the effect of an annual meeting.

1.2 Special Meetings. Special meetings of the shareholders may be called by the President or by the Directors, and shall be called by the Secretary, or in case of the death, absence, incapacity or refusal of the Secretary, by another officer, if the holders of at least 10%, or such lesser percentage as the Articles of Organization permit, of all the votes entitled to be cast on any issue to be considered at the proposed special meeting sign, date, and deliver to the Secretary one or more written demands for the meeting describing the purpose for which it is to be held. Only business within the purpose or purposes described in the meeting notice may be conducted at a special shareholders' meeting.

1.3 Place of Meetings. All meetings of shareholders shall be held at the principal office of the Corporation unless a different place is specified in the notice of the meeting or the meeting is held solely by means of remote communication in accordance with Section 1.11.

1.4 Requirement of Notice. A written notice of the date, time and place of each annual and special shareholders' meeting describing the purposes of the meeting shall be given to shareholders entitled to vote at the meeting (and, to the extent required by law or the Articles of Organization, to shareholders not entitled to vote at the meeting) no fewer than seven nor more than 60 days before the meeting date. If an annual or special meeting of shareholders is adjourned to a different date, time or place, notice need not be given of the new date, time or place if the new date, time or place, if any, is announced at the meeting before adjournment. If a new record date for the adjourned meeting is fixed, however, notice of the adjourned meeting shall be given under this Section 1.4 to persons who are shareholders as of the new record date. All notices to shareholders shall conform to the requirements of Section 3.

1.5 Waiver of Notice. A shareholder may waive any notice required by law, the Articles of Organization, or these By-Laws before or after the date and time stated in the notice. The waiver shall be in writing, be signed by the shareholder entitled to the notice, and be

delivered to the Corporation for inclusion with the records of the meeting. A shareholder's attendance at a meeting (a) waives objection to lack of notice or defective notice of the meeting, unless the shareholder at the beginning of the meeting objects to holding the meeting or transacting business at the meeting, and (b) waives objection to consideration of a particular matter at the meeting that is not within the purpose or purposes described in the meeting notice, unless the shareholder objects to considering the matter when it is presented.

1.6 Quorum.

1.6.1 Unless otherwise provided by law, or in the Articles of Organization, these By-Laws or a resolution of the Directors requiring satisfaction of a greater quorum requirement for any voting group, a majority of the votes entitled to be cast on the matter by a voting group constitutes a quorum of that voting group for action on that matter. As used in these By-Laws, a voting group includes all shares of one or more classes or series that, under the Articles of Organization or the Massachusetts Business Corporation Act, Massachusetts General Laws Chapter 156D, as in effect from time to time (the "MBCA"), are entitled to vote and to be counted together collectively on a matter at a meeting of shareholders.

1.6.2 A share once represented for any purpose at a meeting is deemed present for quorum purposes for the remainder of the meeting and for any adjournment of that meeting unless (a) the shareholder attends solely to object to lack of notice, defective notice or the conduct of the meeting on other grounds and does not vote the shares or otherwise consent that they are to be deemed present, or (b), in the case of an adjournment, a new record date is or shall be set for that adjourned meeting.

1.7 Voting and Proxies. Unless the Articles of Organization provide otherwise, each outstanding share, regardless of class, is entitled to one vote on each matter voted on at a shareholders' meeting. A shareholder may vote his or her shares in person or may appoint a proxy to vote or otherwise act for him or her by signing an appointment form, either personally or by his or her attorney-in-fact. An appointment of a proxy is effective when received by the Secretary or other officer or agent authorized to tabulate votes. Unless otherwise provided in the appointment form, an appointment is valid for a period of 11 months from the date the shareholder signed the form or, if it is undated, from the date of its receipt by the officer or agent. An appointment of a proxy is revocable by the shareholder unless the appointment form conspicuously states that it is irrevocable and the appointment is coupled with an interest, as defined in the MBCA. An appointment made irrevocable is revoked when the interest with which it is coupled is extinguished. The death or incapacity of the shareholder appointing a proxy shall not affect the right of the Corporation to accept the proxy's authority unless notice of the death or incapacity is received by the Secretary or other officer or agent authorized to tabulate votes before the proxy exercises his or her authority under the appointment. A transferee for value of shares subject to an irrevocable appointment may revoke the appointment if he or she did not know of its existence when he or she acquired the shares and the existence of the irrevocable appointment was not noted conspicuously on the certificate representing the shares or on the information statement for shares without certificates. Subject to the provisions of Section 7.24 of the MBCA and to any express limitation on the proxy's authority appearing on the face of the appointment form, the Corporation is entitled to accept the proxy's vote or other action as that of the shareholder making the appointment.

1.8 Action at Meeting. If a quorum of a voting group exists, favorable action on a matter, other than the election of Directors, is taken by a voting group if the votes cast within the group favoring the action exceed the votes cast opposing the action, unless a greater number of affirmative votes is required by law, or the Articles of Organization, these By-Laws or a resolution of the Board of Directors requiring receipt of a greater affirmative vote of the shareholders, including more separate voting groups. Directors are elected by a plurality of the votes cast by the shares entitled to vote in the election at a meeting at which a quorum is present. No ballot shall be required for such election unless requested by a shareholder present or represented at the meeting and entitled to vote in the election.

1.9 Action Without Meeting by Written Consent.

1.9.1 Action required or permitted to be taken at a shareholders' meeting may be taken without a meeting if the action is taken either: (a) by all shareholders entitled to vote on the action; or (b), to the extent permitted by the Articles of Organization, by shareholders having not less than the minimum number of votes necessary to take the action at a meeting at which all shareholders entitled to vote on the action are present and voting. The action shall be evidenced by one or more written consents that describe the action taken, are signed by shareholders having the requisite votes, bear the date of the signatures of such shareholders, and are delivered to the Corporation for inclusion with the records of meetings within 60 days of the earliest dated consent delivered to the Corporation as required by this Section 1.9.1. A consent signed under this Section 1.9.1 has the effect of a vote at a meeting.

1.9.2 If action is to be taken pursuant to the consent of voting shareholders without a meeting, the Corporation, at least seven days before the action pursuant to the consent is taken, shall give notice, which complies in form with the requirements of Section 3, of the action (a) to nonvoting shareholders in any case where such notice would be required by law if the action were to be taken pursuant to a vote by voting shareholders at a meeting, and (b), if the action is to be taken pursuant to the consent of less than all the shareholders entitled to vote on the matter, to all shareholders entitled to vote who did not consent to the action. The notice shall contain, or be accompanied by, the same material that would have been required by law to be sent to shareholders in or with the notice of a meeting at which the action would have been submitted to the shareholders for approval.

1.10 Record Date. The Directors may fix the record date in order to determine the shareholders entitled to notice of a shareholders' meeting, to demand a special meeting, to vote, or to take any other action. If a record date for a specific action is not fixed by the Board of Directors, and is not supplied by law, the record date shall be the close of business either on the day before the first notice is sent to shareholders, or, if no notice is sent, on the day before the meeting or, in the case of action without a meeting by written consent, the date the first shareholder signs the consent. A record date fixed under this Section 1.10 may not be more than 70 days before the meeting or action requiring a determination of shareholders. A determination of shareholders entitled to notice of or to vote at a shareholders' meeting is effective for any adjournment of the meeting unless the Board of Directors fixes a new record date, which it shall do if the meeting is adjourned to a date more than 120 days after the date fixed for the original meeting.

1.11 Meetings by Remote Communications. Unless otherwise provided in the Articles of Organization, if authorized by the Directors, any annual or special meeting of shareholders need not be held at any place but may instead be held solely by means of remote communication; and subject to such guidelines and procedures as the Board of Directors may adopt, shareholders and proxyholders not physically present at a meeting of shareholders may, by means of remote communications: (a) participate in a meeting of shareholders; and (b) be deemed present in person and vote at a meeting of shareholders whether such meeting is to be held at a designated place or solely by means of remote communication, provided that: (i) the Corporation shall implement reasonable measures to verify that each person deemed present and permitted to vote at the meeting by means of remote communication is a shareholder or proxyholder; (ii) the Corporation shall implement reasonable measures to provide such shareholders and proxyholders a reasonable opportunity to participate in the meeting and to vote on matters submitted to the shareholders, including an opportunity to read or hear the proceedings of the meeting substantially concurrently with such proceedings; and (iii), if any shareholder or proxyholder votes or takes other action at the meeting by means of remote communication, a record of such vote or other action shall be maintained by the Corporation.

1.12 Form of Shareholder Action.

1.12.1 Any vote, consent, waiver, proxy appointment or other action by a shareholder or by the proxy or other agent of any shareholder shall be considered given in writing, dated and signed, if, in lieu of any other means permitted by law, it consists of an electronic transmission that sets forth or is delivered with information from which the Corporation can determine (a) that the electronic transmission was transmitted by the shareholder, proxy or agent or by a person authorized to act for the shareholder, proxy or agent; and (b) the date on which such shareholder, proxy, agent or authorized person transmitted the electronic transmission. The date on which the electronic transmission is transmitted shall be considered to be the date on which it was signed. The electronic transmission shall be considered received by the Corporation if it has been sent to any address specified by the Corporation for the purpose or, if no address has been specified, to the principal office of the Corporation, addressed to the Secretary or other officer or agent having custody of the records of proceedings of shareholders.

1.12.2 Any copy, facsimile or other reliable reproduction of a vote, consent, waiver, proxy appointment or other action by a shareholder or by the proxy or other agent of any shareholder may be substituted or used in lieu of the original writing for any purpose for which the original writing could be used, but the copy, facsimile or other reproduction shall be a complete reproduction of the entire original writing.

2. DIRECTORS.

2.1 Powers. All corporate power shall be exercised by or under the authority of, and the business and affairs of the Corporation shall be managed under the direction of, its Board of Directors.

2.2 Number and Election. The Board of Directors shall consist of one or more individuals, with the number fixed by the shareholders at the annual meeting or by the Board of Directors, but, unless otherwise provided in the Articles of Organization, if the Corporation has more than one shareholder, the number of Directors shall not be less than three, except that whenever there shall be only two shareholders, the number of Directors shall not be less than two. Except as otherwise provided in these By-Laws or the Articles of Organization, the Directors shall be elected by the shareholders at the annual meeting.

2.3 Vacancies. If a vacancy occurs on the Board of Directors, including a vacancy resulting from an increase in the number of Directors: (a) the shareholders may fill the vacancy; (b) the Board of Directors may fill the vacancy; or (c), if the Directors remaining in office constitute fewer than a quorum of the Board, they may fill the vacancy by the affirmative vote of a majority of all the Directors remaining in office. A vacancy that will occur at a specific later date may be filled before the vacancy occurs but the new Director may not take office until the vacancy occurs.

2.4 Change in Size of the Board of Directors. The number of Directors may be fixed or changed from time to time by the shareholders or the Board of Directors, and the Board of Directors may increase or decrease the number of Directors last approved by the shareholders.

2.5 Tenure. The terms of all Directors shall expire at the next annual shareholders' meeting following their election. A decrease in the number of Directors does not shorten an incumbent Director's term. The term of a Director elected to fill a vacancy shall expire at the next shareholders' meeting at which Directors are elected. Despite the expiration of a Director's term, he or she shall continue to serve until his or her successor is elected and qualified or until there is a decrease in the number of Directors.

2.6 Resignation. A Director may resign at any time by delivering written notice of resignation to the Board of Directors, its chairman, or to the Corporation. A resignation is effective when the notice is delivered unless the notice specifies a later effective date.

2.7 Removal. The shareholders may remove one or more Directors with or without cause. A Director may be removed for cause by the Directors by vote of a majority of the Directors then in office. A Director may be removed by the shareholders or the Directors only at a meeting called for the purpose of removing him or her, and the meeting notice must state that the purpose, or one of the purposes, of the meeting is removal of the Director.

2.8 Regular Meetings. Regular meetings of the Board of Directors may be held at such times and places as shall from time to time be fixed by the Board of Directors without notice of the date, time, place or purpose of the meeting. If a quorum of Directors is present, the annual meeting of the Board of Directors, for the appointment of officers and consideration of

other matters, shall be held without notice immediately after the annual meeting of shareholders and at the same place.

2.9 Special Meetings. Special meetings of the Board of Directors may be called by the President, by the Secretary, by any two Directors, or by one Director in the event that there is only one Director.

2.10 Notice. Special meetings of the Board must be preceded by at least two days' notice of the date, time and place of the meeting. The notice need not describe the purpose of the special meeting. All notices to directors shall conform to the requirements of Section 3.

2.11 Waiver of Notice. A Director may waive any notice before or after the date and time of the meeting. The waiver shall be in writing, signed by the Director entitled to the notice, or in the form of an electronic transmission by the Director to the Corporation, and filed with the minutes or corporate records. A Director's attendance at or participation in a meeting waives any required notice to him or her of the meeting unless the Director, at the beginning of the meeting or promptly upon his or her arrival, objects to holding the meeting or transacting business at the meeting and does not thereafter vote for or assent to action taken at the meeting.

2.12 Quorum. A quorum of the Board of Directors consists of a majority of the Directors then in office, provided always that any number of Directors (whether one or more and whether or not constituting a quorum) constituting a majority of Directors present at any meeting or at any adjourned meeting may make any reasonable adjournment thereof.

2.13 Action at Meeting. If a quorum is present when a vote is taken, the affirmative vote of a majority of Directors present is the act of the Board of Directors. A Director who is present at a meeting of the Board of Directors or a committee of the Board of Directors when corporate action is taken is considered to have assented to the action taken unless: (a) he or she objects at the beginning of the meeting, or promptly upon his or her arrival, to holding it or transacting business at the meeting; (b) his or her dissent or abstention from the action taken is entered in the minutes of the meeting; or (c) he or she delivers written notice of his or her dissent or abstention to the presiding officer of the meeting before its adjournment or to the Corporation immediately after adjournment of the meeting. The right of dissent or abstention is not available to a Director who votes in favor of the action taken.

2.14 Action Without Meeting. Any action required or permitted to be taken by the Directors may be taken without a meeting if the action is taken by the unanimous consent of the members of the Board of Directors. The action must be evidenced by one or more consents describing the action taken, in writing, signed by each Director, or delivered to the Corporation by electronic transmission to the address specified by the Corporation for the purpose or, if no address has been specified, to the principal office of the Corporation, addressed to the Secretary or other officer or agent having custody of the records of proceedings of Directors, and included in the minutes or filed with the corporate records reflecting the action taken. Action taken under this Section 2.14 is effective when the last Director signs or delivers the consent, unless the consent specifies a different effective date. A consent signed or delivered under this Section 2.14 has the effect of a meeting vote and may be described as such in any document.

2.15 Telephone Conference Meetings. The Board of Directors may permit any or all Directors to participate in a regular or special meeting by, or conduct the meeting through the use of, any means of communication by which all Directors participating may simultaneously hear each other during the meeting. A Director participating in a meeting by this means is considered to be present in person at the meeting.

2.16 Committees. The Board of Directors may create one or more committees and appoint members of the Board of Directors to serve on them. Each committee may have one or more members, who serve at the pleasure of the Board of Directors. The creation of a committee and appointment of members to it must be approved by a majority of all the Directors in office when the action is taken. Section 3 and Sections 2.10 through 2.15 of these By-Laws shall apply to committees and their members. To the extent specified by the Board of Directors, each committee may exercise the authority of the Board of Directors. A committee may not, however: (a) authorize distributions; (b) approve or propose to shareholders action that the MBCA requires be approved by shareholders; (c) change the number of the Board of Directors, remove Directors from office or fill vacancies on the Board of Directors; (d) amend the Articles of Organization; (e) adopt, amend or repeal By-Laws; or (f) authorize or approve reacquisition of shares, except according to a formula or method prescribed by the Board of Directors.

2.17. Compensation. The Board of Directors may fix the compensation of Directors.

2.18 Loans to Directors. The Corporation may not lend money to, or guarantee the obligation of, a Director unless: (a) the specific loan or guarantee is approved by a majority of the votes represented by the outstanding voting shares of all classes, voting as a single voting group, except the votes of shares owned by or voted under the control of the benefited Director; or (b) the Board of Directors determines that the loan or guarantee benefits the Corporation and either approves the specific loan or guarantee or a general plan authorizing loans and guarantees. The fact that a loan or guarantee is made in violation of this Section 2.18 shall not affect the borrower's liability on the loan.

3. MANNER OF NOTICE.

All notices hereunder shall conform to the following requirements:

3.1 Notice shall be in writing unless oral notice is reasonable under the circumstances. Notice by electronic transmission is written notice.

3.2 Notice may be communicated as follows: (a) in person; (b) by telephone, voice mail or other electronic means; (c) by mail; (d) by electronic transmission; or (e) by messenger or delivery service.

3.3 Written notice to a shareholder, other than notice by electronic transmission, if in a comprehensible form, is effective upon deposit in the United States mail, if mailed postpaid and correctly addressed to the shareholder's address shown in the Corporation's current record of shareholders.

3.4 Written notice by electronic transmission, if in comprehensible form, is effective: (a) if by facsimile telecommunication, when directed to a number furnished by the shareholder

for the purpose; (b) if by electronic mail, when directed to an electronic mail address furnished by the shareholder for the purpose; (c) if by a posting on an electronic network together with separate notice to the shareholder of such specific posting, directed to an electronic mail address furnished by the shareholder for the purpose, upon the later of (i) such posting and (ii) the giving of such separate notice; and (d) if by any other form of electronic transmission, when directed to the shareholder in such manner as the shareholder shall have specified to the Corporation. An affidavit of the Secretary or an Assistant Secretary of the Corporation, the transfer agent or other agent of the Corporation that the notice has been given by a form of electronic transmission shall, in the absence of fraud, be prima facie evidence of the facts stated therein.

3.5 Except as provided in Section 3.3, written notice, other than notice by electronic transmission, if in a comprehensible form, is effective at the earliest of the following: (a) when received; (b) five days after its deposit in the United States mail, if mailed postpaid and correctly addressed; (c) on the date shown on the return receipt, if sent by registered or certified mail, return receipt requested, or (d), if sent by messenger or delivery service, on the date shown on the return receipt signed by or on behalf of the addressee.

3.6 Oral notice is effective when communicated if communicated in a comprehensible manner.

4. OFFICERS.

4.1 Enumeration. The Corporation shall have a President, a Treasurer, a Secretary and such other officers as may be appointed by the Board of Directors from time to time in accordance with these By-Laws. The Board may appoint one of its members to the office of Chairman of the Board and from time to time define the powers and duties of that office notwithstanding any other provisions of these By-Laws.

4.2 Appointment. The officers shall be appointed by the Board of Directors. A duly appointed officer may appoint one or more officers or assistant officers if authorized by the Board of Directors. Each officer has the authority and shall perform the duties set forth in these By-Laws or, to the extent consistent with these By-Laws, the duties prescribed by the Board of Directors or by direction of an officer authorized by the Board of Directors to prescribe the duties of other officers.

4.3 Qualification. The same individual may simultaneously hold more than one office in the Corporation.

4.4 Tenure. Officers shall hold office until the first meeting of the Directors following the next annual meeting of shareholders after their appointment and until their respective successors are duly appointed, unless a shorter or longer term is specified in the vote appointing them.

4.5 Resignation. An officer may resign at any time by delivering notice of the resignation to the Corporation. A resignation is effective when the notice is delivered unless the notice specifies a later effective date. If a resignation is made effective at a later date and the Corporation accepts the future effective date, the Board of Directors may fill the pending

vacancy before the effective date if the Board of Directors provides that the successor shall not take office until the effective date.

4.6 Removal. The Board of Directors may remove any officer at any time with or without cause.

4.7 President. The President when present shall preside at all meetings of the shareholders and, if there is no Chairman of the Board of Directors, of the Directors. He or she shall be the chief executive officer of the Corporation except as the Board of Directors may otherwise provide. The President shall perform such duties and have such powers additional to the foregoing as the Directors shall designate.

4.8 Treasurer. The Treasurer shall, subject to the direction of the Directors, have general charge of the financial affairs of the Corporation and shall cause to be kept accurate books of accounts. He or she shall have custody of all funds, securities, and valuable documents of the Corporation, except as the Directors may otherwise provide. The Treasurer shall perform such duties and have such powers additional to foregoing as the Directors may designate.

4.9 Secretary. The Secretary shall have responsibility for preparing minutes of the Directors' and shareholders' meetings and for authenticating records of the Corporation. The Secretary shall perform such duties and have such powers additional to the foregoing as the Directors shall designate.

5. PROVISIONS RELATING TO SHARES.

5.1 Issuance and Consideration. The Board of Directors may issue the number of shares of each class or series authorized by the Articles of Organization. The Board of Directors may authorize shares to be issued for consideration consisting of any tangible or intangible property or benefit to the Corporation, including cash, promissory notes, services performed, contracts for services to be performed, or other securities of the Corporation. Before the Corporation issues shares, the Board of Directors shall determine that the consideration received or to be received for shares to be issued is adequate. The Board of Directors shall determine the terms upon which the rights, options, or warrants for the purchase of shares or other securities of the Corporation are issued and the terms, including the consideration, for which the shares or other securities are to be issued.

5.2 Share Certificates. The shares of the Corporation shall be represented by certificates in the form approved by the Board. At a minimum, each share certificate shall state on its face: (a) the name of the Corporation and that it is organized under the laws of the Commonwealth of Massachusetts; (b) the name of the person to whom issued; and (c) the number and class of shares and the designation of the series, if any, the certificate represents. If different classes of shares or different series within a class are authorized, then the variations in rights, preferences and limitations applicable to each class and series, and the authority of the Board of Directors to determine variations for any future class or series, must be summarized on the front or back of each certificate. Alternatively, each certificate may state conspicuously on its front or back that the Corporation will furnish the shareholder this information on request in writing and without charge. Each share certificate shall be signed, either manually or in

facsimile, by the President or a Vice President and by the Treasurer or an Assistant Treasurer, or any two officers designated by the Board of Directors, and shall bear the corporate seal or its facsimile. If the person who signed, either manually or in facsimile, a share certificate no longer holds office when the certificate is issued, the certificate shall be nevertheless valid.

5.3 Record and Beneficial Owners. The Corporation shall be entitled to treat as the shareholder the person in whose name shares are registered in the records of the Corporation or, if the Board of Directors has established a procedure by which the beneficial owner of shares that are registered in the name of a nominee will be recognized by the Corporation as a shareholder, the beneficial owner of shares to the extent of the rights granted by a nominee certificate on file with the Corporation.

5.4 Lost or Destroyed Certificates. The Board of Directors of the Corporation may, subject to Massachusetts General Laws, Chapter 106, Section 8-405, determine the conditions upon which a new share certificate may be issued in place of any certificate alleged to have been lost, destroyed, or wrongfully taken. The Board of Directors may, in its discretion, require the owner of such share certificate, or his or her legal representative, to give a bond, sufficient in its opinion, with or without surety, to indemnify the Corporation against any loss or claim which may arise by reason of the issue of the new certificate.

6. CORPORATE RECORDS.

6.1 Records to be Kept.

6.1.1 The Corporation shall keep as permanent records minutes of all meetings of its shareholders and Board of Directors, a record of all actions taken by the shareholders or Board of Directors without a meeting, and a record of all actions taken by a committee of the Board of Directors in place of the Board of Directors. The Corporation shall maintain appropriate accounting records. The Corporation or its agent shall maintain a record of its shareholders, in a form that permits preparation of a list of the names and addresses of all shareholders, in alphabetical order by class of shares showing the number and class of shares held by each. The Corporation shall maintain its records in written form or in another form capable of conversion into written form within a reasonable time.

6.1.2 The Corporation shall keep within the Commonwealth of Massachusetts a copy of the following records at its principal office or an office of its Secretary, Assistant Secretary or registered agent:

6.1.2.1 the Corporation's Articles of Organization or Restated Articles of Organization and all amendments thereto currently in effect;

6.1.2.2 the Corporation's By-Laws or restated By-Laws and all amendments to them currently in effect;

6.1.2.3 resolutions adopted by its Board of Directors creating one or more classes or series of shares, and fixing their relative rights, preferences, and limitations, if shares issued pursuant to those resolutions are outstanding;

6.1.2.4 the minutes of all shareholders' meetings and records of all action taken by shareholders without a meeting, for the past three years;

6.1.2.5 all written communications to shareholders generally within the past three years, including the financial statements of the Corporation furnished under Section 16.20 of the MBCA for the past three years;

6.1.2.6 a list of the names and business addresses of the Corporation's current Directors and officers; and

6.1.2.7 the Corporation's most recent annual report delivered to the Massachusetts Secretary of State.

6.2 Inspection of Records by Shareholders.

6.2.1 A shareholder is entitled to inspect and copy, during regular business hours at the office where they are maintained pursuant to Section 6.1.2, copies of any of the records of the Corporation described in Section 6.1.2 if he or she gives the Corporation written notice of his or her demand at least five business days before the date on which he or she wishes to inspect and copy such records.

6.2.2 A shareholder is entitled to inspect and copy, during regular business hours at a reasonable location specified by the Corporation, any of the following records of the Corporation if the shareholder meets the requirements of Section 6.2.3 and gives the Corporation written notice of his or her demand at least five business days before the date on which he or she wishes to inspect and copy such records:

6.2.2.1 excerpts from minutes reflecting action taken at any meeting of the Board of Directors, records of any action of a committee of the Board of Directors while acting in place of the Board of Directors on behalf of the Corporation, minutes of any meeting of the shareholders and records of action taken by the shareholders or Board of Directors without a meeting, to the extent not subject to inspection under Section 6.2.1;

6.2.2.2 accounting records of the Corporation, but if the financial statements of the Corporation are audited by a certified public accountant, inspection shall be limited to the financial statements and the supporting schedules reasonably necessary to verify any line item on those statements; and

6.2.2.3 the record of shareholders described in Section 6.1.1.

6.2.3 A shareholder may inspect and copy the records described in Section 6.2.2 only if:

6.2.3.1 his or her demand is made in good faith and for a proper purpose;

6.2.3.2 he or she describes with reasonable particularity his or her purpose and the records he or she desires to inspect;

6.2.3.3 the records are directly connected with his or her purpose; and

6.2.3.4 the Corporation shall not have determined in good faith that disclosure of the records sought would adversely affect the Corporation in the conduct of its business.

6.2.4 For purposes of this Section 6.2, "shareholder" includes a beneficial owner whose shares shall be held in a voting trust or by a nominee on his or her behalf.

6.3 Scope of Inspection Right.

6.3.1 A shareholder's agent or attorney shall have the same inspection and copying rights as the shareholder represented.

6.3.2 The Corporation may, if reasonable, satisfy the right of a shareholder to copy records under Section 6.2 by furnishing to the shareholder copies by photocopy or other means chosen by the Corporation, including copies furnished through an electronic transmission.

6.3.3 The Corporation may impose a reasonable charge, covering the costs of labor, material, transmission and delivery, for copies of any documents provided to a shareholder. The charge may not exceed the estimated cost of production, reproduction, transmission or delivery of the records.

6.3.4 The Corporation may comply at its expense with a shareholder's demand to inspect the record of shareholders under Section 6.2.2.3 by providing the shareholder with a list of shareholders that was compiled no earlier than the date of the shareholder's demand.

6.3.5 The Corporation may impose reasonable restrictions on the use or distribution of records by the demanding shareholder.

6.4 Inspection of Records by Directors. A Director is entitled to inspect and copy the books, records and documents of the Corporation at any reasonable time to the extent reasonably related to the performance of the Director's duties as a Director, including duties as a member of a committee, but not for any other purpose or in any manner that would violate any duty to the Corporation.

7. INDEMNIFICATION OF DIRECTORS AND OFFICERS.

The Corporation shall indemnify, to the fullest extent permitted by Massachusetts law, each person who is or was a Director or officer, respectively, of the Corporation or who, while a Director or officer of the Corporation, is or was serving at the Corporation's request as a director, officer, partner, trustee, employee or agent of another domestic or foreign corporation, partnership, joint venture, trust, employee benefit plan or other entity. The Corporation shall not be obligated, however, to advance funds to pay for or reimburse expenses unless the Board of Directors authorizes such payment for or reimbursement of expenses in a particular instance pursuant to Section 8.53 of the MBCA. A Director or officer is considered to be serving an employee benefit plan at the Corporation's request if his or her duties to the Corporation also impose duties on, or otherwise involve services by, him or her to the plan or to participants in or

beneficiaries of the plan. “Director” or “officer” includes the estate or personal representative of a Director or officer.

8. FISCAL YEAR.

The fiscal year of the Corporation shall be the year ending with December 31 in each year.

9. AMENDMENTS.

9.1 The power to make, amend or repeal these By-Laws shall be in the shareholders. If authorized by the Articles of Organization, the Board of Directors may also make, amend or repeal these By-Laws in whole or in part, except with respect to any provision thereof which by virtue of an express provision in the MBCA, the Articles of Organization, or these By-Laws, requires action by the shareholders.

9.2 Not later than the time of giving notice of the meeting of shareholders next following the making, amending or repealing by the Board of Directors of any By-Law, notice stating the substance of the action taken by the Board of Directors shall be given to all shareholders entitled to vote on amending these By-Laws. Any action taken by the Board of Directors with respect to these By-Laws may be amended or repealed by the shareholders.

9.3 Approval of an amendment to these By-Laws that changes or deletes a quorum or voting requirement for action by shareholders must satisfy both the applicable quorum and voting requirements for action by shareholders with respect to amendment of these By-Laws and also the particular quorum and voting requirements sought to be changed or deleted.

9.4 A By-Law dealing with quorum or voting requirements for shareholders, including additional voting groups, may not be adopted, amended or repealed by the Board of Directors.

9.5 A By-Law that fixes a greater or lesser quorum requirement for action by the Board of Directors, or a greater voting requirement, than provided for by the MBCA may be amended or repealed by the shareholders, or by the Board of Directors if authorized pursuant to Section 9.1.

9.6 If the Board of Directors is authorized to amend these By-Laws, approval by the Board of Directors of an amendment to these By-Laws that changes or deletes a quorum or voting requirement for action by the Board of Directors must satisfy both the applicable quorum and voting requirements for action by the Board of Directors with respect to amendment of these By-Laws, and also the particular quorum and voting requirements sought to be changed or deleted.

Adopted: May 13, 2019



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

mass.gov/dor

Letter ID: L1102538624
Notice Date: August 28, 2019
Case ID: 0-000-737-188



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



J-B.A.M. INC.
71 DOWNING PKWY BLDG A
PITTSFIELD MA 01201-3882

Why did I receive this notice?

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

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

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

What if I have questions?

If you have questions, call us at (617) 887-6400 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 8:30 a.m. to 4:30 p.m..

Visit us online!

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

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

Edward W. Coyle, Jr., Chief
Collections Bureau

DF
PC

The Commonwealth of Massachusetts

William Francis Galvin
Secretary of the Commonwealth
One Ashburton Place, Boston, Massachusetts 02108-1512

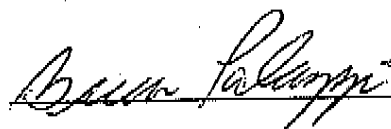
FORM MUST BE TYPED

Articles of Correction (General Laws Chapter 156D, Section 1.24, 950 CMR 113.12)

FORM MUST BE TYPED

- (1) Exact name of corporation: J - B.A.M., Inc.
- (2) Registered office address: 66 West Street, Suite 300, Pittsfield, MA 01201
(number, street, city or town, state, zip code)
- (3) Describe the document to be corrected*: Articles of Organization
- (4) Date the document was filed: May 14, 2019
(month, day, year)
- (5) Specify the typographical error, the incorrect statement and the reason it is incorrect, or the manner in which the execution was defective: Article VIII, Paragraph c. incorrectly states that Anthony Palazzi is a director of the
corporation.
- (6) Correction of the typographical error, incorrect statement or defective execution: Article VIII, Paragraph c. as
corrected, should provide that the following individuals are directors of the corporation:
Brian E. Palazzi, 724 Tolland Road, Otis, MA 01029; mailing address P. O. Box 311, East Otis, MA 01029
Monique Palazzi, 724 Tolland Road, Otis, MA 01029; mailing address P. O. Box 311, East Otis, MA 01029

Signed by:



(signature of authorized individual)

- ☐ Incorporator,
☐ Chairman of the board of directors,
☒ President,
☐ Other officer,
☐ Court-appointed fiduciary,

on this 4th day of November, 2019

* or attach a copy of the document to these articles

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:

November 06, 2019 06:38 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

D

The Commonwealth of Massachusetts

William Francis Galvin
Secretary of the Commonwealth
One Ashburton Place, Boston, Massachusetts 02108-1512

FORM MUST BE TYPED

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

FORM MUST BE TYPED

ARTICLE I

The exact name of the corporation is:

J - B.A.M., Inc.

ARTICLE II

Unless the articles of organization otherwise provide, all corporations formed pursuant to G.L. Chapter 156D have the purpose of engaging in any lawful business. Please specify if you want a more limited purpose:

ARTICLE III

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

WITHOUT PAR VALUE		WITH PAR VALUE		
TYPE	NUMBER OF SHARES	TYPE	NUMBER OF SHARES	PAR VALUE
Common	275,000			

**G.L. Chapter 156D eliminates the concept of par value, however a corporation may specify par value in Article III. See G.L. Chapter 156D, Section 6.21, and the comments relative thereto.*

ARTICLE IV

Prior to the issuance of shares of any class or series, the articles of organization must set forth the preferences, limitations and relative rights of that class or series. The articles may also limit the type or specify the minimum amount of consideration for which shares of any class or series may be issued. Please set forth the preferences, limitations and relative rights of each class or series and, if desired, the required type and minimum amount of consideration to be received.

Not applicable

ARTICLE V

The restrictions, if any, imposed by the articles of organization upon the transfer of shares of any class or series of stock are:

None

ARTICLE VI

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

See Continuation Sheet VI attached hereto and made a part hereof.

Articles of Organization of J - B.A.M., Inc.
Continuation Sheet VI

1. Minimum Number of Directors. The board of directors may consist of one or more individuals, notwithstanding the number of shareholders.
2. Personal Liability of Directors to Corporation. No director shall have personal liability to the corporation for monetary damages for breach of fiduciary duty as a director notwithstanding any provision of law imposing such liability; provided however, that, to the extent required by applicable law, this provision shall not eliminate or limit the liability of a director (a) for any breach of the director's duty of loyalty to the corporation or its shareholders, (b) for acts or omissions not in good faith or which involve intentional misconduct or a knowing violation of law, (c) for improper distributions under Section 6.40 of Chapter 156D of the General Laws of Massachusetts or successor provisions thereto, or (d) for any transaction from which the director derived an improper personal benefit. No amendment to or repeal of this provision shall apply to or have any effect on the liability or alleged liability of any director for or with respect to any act or omission of such director occurring prior to such repeal or amendment.
3. Authorization of Directors to Make, Amend or Repeal By-Laws. The board of directors may make, amend or repeal the by-laws in whole or in part, except with respect to any provision thereof which by virtue of an express provision in Chapter 156D of the General Laws of Massachusetts, the Articles of Organization or the by-laws requires action by the shareholders.

ARTICLE VII

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

ARTICLE VIII

The information contained in this article is not a permanent part of the articles of organization.

- a. The street address of the initial registered office of the corporation in the commonwealth:
66 West Street, Suite 300, Pittsfield, MA 01201
- b. The name of its initial registered agent at its registered office: **Cain, Hibbard & Myers, PC**
- c. The names and street addresses of the individuals who will serve as the initial directors, president, treasurer and secretary of the corporation (an address need not be specified if the business address of the officer or director is the same as the principal office location):

President: **Brian E. Palazzi, 724 Tolland Road, Otis, MA 01029; mailing address P. O. Box 311, East Otis, MA 01029**

Treasurer: **Monique Palazzi, 724 Tolland Road, Otis, MA 01029; mailing address P. O. Box 311, East Otis, MA 01029**

Secretary: **Monique Palazzi, 724 Tolland Road, Otis, MA 01029; mailing address P. O. Box 311, East Otis, MA 01029**

Director(s): **Brian E. Palazzi, 724 Tolland Road, Otis, MA 01029; mailing address P. O. Box 311, East Otis, MA 01029**
Monique Palazzi, 724 Tolland Road, Otis, MA 01029; mailing address P. O. Box 311, East Otis, MA 01029
Anthony Palazzi, 73 Dickinson Drive, Granville MA 01034

- d. The fiscal year end of the corporation: **December**
- e. A brief description of the type of business in which the corporation intends to engage: **The corporation is being formed for the purpose of applying to the Massachusetts Cannabis Control Commission for a license for marijuana cultivation.**
- f. The street address of the principal office of the corporation: **c/o Cain, Hibbard & Myers, PC, 66 West Street, Suite 300, Pittsfield, MA 01201**
- g. The street address where the records of the corporation required to be kept in the commonwealth are located is:

c/o Cain, Hibbard & Myers, PC, 66 West Street, Suite 300, Pittsfield, MA 01201, which is
(number, street, city or town, state, zip code)

- ☐ its principal office;
- ☐ an office of its transfer agent;
- ☐ an office of its secretary/assistant secretary;
- ☒ its registered office.

Signed this **13th** day of **May**, **2019** by the incorporator(s):

Signature: **F. Sydney Smithers**

Name: **F. Sydney Smithers, Esq.**

Address: **Cain, Hibbard & Myers, PC, 66 West Street, Suite 300, Pittsfield, MA 01201**

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:

May 14, 2019 03:36 PM

A handwritten signature in black ink, reading "William Francis Galvin". The signature is written in a cursive style with a large, stylized 'G' at the end.

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth



March 14, 2020

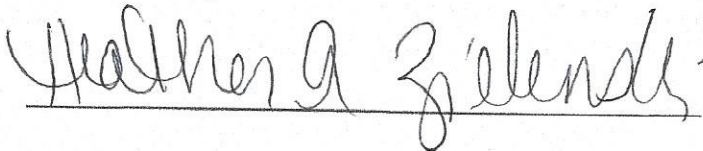
To Whom It May Concern;

J-B.A.M. is attesting that they cannot provide a certificate of good standing from the Department of Unemployment Assistance, as they are unable to register with the Department of Unemployment Assistance until they begin hiring employees. J-B.A.M. will submit a certificate of good standing from the Department of Unemployment Assistance once they begin hiring employees and are able to register with the Department of Unemployment Assistance. 935 CMR 500.101(1)



Brian Palazzi, President, CEO
J-B.A.M.

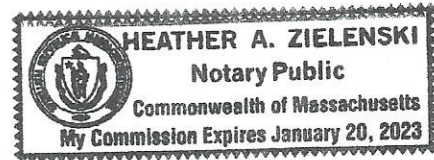
Witnessed by:



PO Box 311, East Otis, MA 01029
(860) 402-0605

On this 16 day of March, 2020, before me, the undersigned notary public, personally appeared Brian E Palazzi proved to me through satisfactory evidence of identification, which were MADL, to be the person whose name is signed on the attached document in my presence.

Heather A Zielenski
Heather A Zielenski
Hampden County



Cannabis Cultivation Facility Business Plan in Pittsfield, Massachusetts

Executive Summary

J – B.A.M., INC. desires to open an adult-use cannabis manufacturing facility which will cultivate cannabis safely along with offering a variety of community impact plans and will bring an infusion of capital into the local economy. J – B.A.M., INC. will cultivate small batch high quality adult-use cannabis under a tier 1 cultivation license. The company intends to earn a stable return with a commodity that is relatively insulated from short-term market forces, for high quality small batch adult-use marijuana having shown to fare far better during periods of over saturation which may occur the market grows, allowing the company to focus on a safe high-quality product being supplied to Massachusetts consumers. The 16,000 sq. ft indoor cannabis cultivation facility at 71 Downing, in an industrially zoned area of Pittsfield MA, shall create 6-10 well-paying jobs and various local contracts throughout the life of its operation. J – B.A.M., INC. has completed site plan review, is in possession of the real estate via a long term lease, and has secured a host community agreement with The City of Pittsfield.

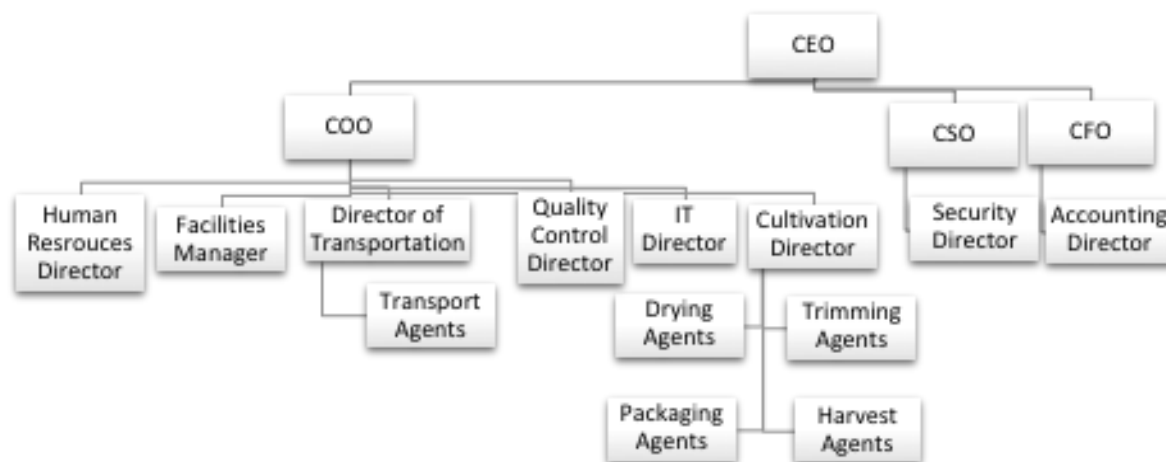
Business Summary

J – B.A.M., INC. was formed for the sole purpose of applying for and receiving authorization to open and operate a Cultivating Marijuana Establishment in the State of Massachusetts. The Company will be a boutique marijuana business that solely cultivates marijuana for adult use markets of Massachusetts. J – B.A.M., INC. has assembled, and will continue to recruit a qualified team of successful cannabis industry professionals committed to serving the market and consumers of Massachusetts by providing them with access to safe, high-quality marijuana products. The husband-wife ownership team rely on their years of experience, with managing teams in a highly technical industry and overseeing a number of commercial businesses. Brian Palazzi has worked in aerospace industry for more than 35 years. His wife, Monique Palazzi has over 20 years of experience as a commercial business owner/operator. Together the husband-wife team have the experience, expertise, and skills required to operate a successful cultivation facility.

Organizational Structure

J – B.A.M., INC.'s staff and organizational structure shall be described in the following chart. For the small boutique nature of the cultivation facility, many of the roles and responsibilities may overlap and justifiably fall to fewer people than the number of positions outlined in the chart. The major responsibilities shall be divided between the ownership, with Brian Palazzi acting as CEO, and Monique Palazzi acting as CFO. Further, each of the C-Suite shall not only be responsible for the departments under their

control, instead; until a staff has been sufficiently trained to occupy directorial or managerial positions, the members of the C-Suite shall occupy some directorial or managerial positions as needed.



Business Plan

J – B.A.M., INC. is committed to operating a professionalized top grade cannabis cultivation facility that will produce the highest grade, craft cannabis in small batches to retailers, manufacturers, and eventually to the consumers of Massachusetts. The idea of producing in a craft a style allows for an optimal quality to be achieved over moderate quantity, allowing J – B.A.M., INC. cannabis to remain sought after by consumers, and in demand by licensed cannabis processors, who will purchase only top grade cannabis products. This will further allow J – B.A.M., INC. to maintain a more favorable price point in relation to the rest of the Massachusetts Cannabis Market as the industry evolves and stabilizes over time. There will be a portion of the market that will demand only the highest quality cannabis products, and for J – B.A.M., INC.s specific cultivation practices, this demand will be satisfied by J – B.A.M., INC.'s product in exchange for a higher price point. J – B.A.M., INC. does not intend to become the Budweiser or Walmart of cannabis, in that the company intends to remain true to their craft cultivation practices and focus on high quality along with safe practices. The company aspires to remain a family run business with core values of providing the finest cannabis in Massachusetts by growing rare, premium varieties on a small batch scale with a focus on every single plant grown; all the while understanding the nature of the industry mandates undaunting and vigilant attention to every detail from when a seed is sprouted to when a finished flower is packaged and ready for consumption.

With this philosophy J – B.A.M., INC. is more protected from market volatility, saturation, over supply, and stagnation, as well as the operational difficulties associated with larger, harder to manage facilities. J – B.A.M., INC. will build a small but loyal

customer base that will consistently purchase their products for their high quality and dedication to small batch craft product, thus insulating the company from a down market, reducing risk of overstock, or aggregating too much inventory at their facility. However, J – B.A.M., INC. has studied the market, and though currently there is no oversupply issue, J – B.A.M., INC. understands the possibility of such an issue as per the natural growing pains of any industry, thus it is in here at to any long term business plan to accommodate and address such an issue. The current market pricing, in Massachusetts, of bulk cannabis per pound more than covers the costs of the growing operation and provides the opportunities for significant profits. Furthermore, for the purposes of our financial model we've remained conservative in overestimating our expenditures and costs of operating while keeping the wholesale price point well below current market and most likely below market into the future, especially given the volume of cannabis J – B.A.M., INC. will produce coupled with the top shelf quality and associated pricing. We have studied more mature markets and have found even in the most down, oversaturated markets, such as Oregon since 2015; the highest quality premium products that are produced in small quantities are able to hold their price position.

The company will employ the use of energy efficient LED lighting, and hydroponic growing methods in automated, environmentally controlled grow areas. Individual pre-fabricated grow modules will be built to the company's specifications by a third party company and will be delivered turn key before operations are set to commence. This allows J – B.A.M., INC. to accelerate speed to market while curbing costs of building and reduce its environmental impact.

J – B.A.M., INC. understands the need not only to take great care during the cultivation cycle but also remain vigilant post-harvest to ensure the quality and integrity of their products remain exemplary throughout the harvesting, drying, trimming, curing, and packaging stages of their top grade cannabis flower. Harvesting will be done by hand at the peak of the plant's productive life cycle, product will be slow-dried and cured for optimum retention of cannabinoids, terpenoids, and flavonoids, now scientifically recognized as hallmarks of high-quality cannabis product. This product shall be handled carefully and diligently through the remaining stages of manufacture in order to ensure an undamaged and non-degraded batch will be sent out to clients post-harvest, and eventually consumers. It is J – B.A.M., INC.'s focus to ensure the cleanest, safest, highest quality cannabis on the market at all times, and the company will take great care in ensuring industry leading quality product harvest upon harvest. As of current, J – B.A.M., INC. is in talks with licensed retailers and processors and is near to securing long term purchase and supply agreements with preferred business to business customers in Massachusetts, to be executed when operational.

Business Model

The Company will operate as a boutique marijuana cultivation business, selling solely into the bulk wholesale markets. The Company has assembled a team of experienced professionals and has the financial wherewithal to successfully execute in this capacity. The Company has identified the marijuana patients of Massachusetts, the Company's agents, and the City of Pittsfield as stakeholders in the Company who are entitled to derive value from its operations, whether through economic stimulation or by the generation of higher quality product.

Products Overview

The Company will grow some of the fastest growing, highest yielding, and best quality strains of marijuana on the market. All of the Company's product will be prepared by highly-trained technicians in a state-of-the-art cultivation facility and in accordance with the highest standards for quality and cleanliness with the utmost focus on the health and safety of the public in mind. Below is a brief description of the products the Company will offer to Massachusetts's consumers:

Marijuana Flower:

Once grown to maturity, marijuana flowers are harvested, dried and cured. After the flower has been properly dried and cured, marijuana flowers are moved to the Packaging & Labeling Area of the facility where the flower will be weighed and packaged. Marijuana flowers are categorized as Sativas, Indicas, and Hybrids. Flower will be sold in bulk and wholesale in 1 lb. packages only.

To accommodate the demands of the state's consumers, it will be necessary to grow a variety of strains with differing cannabinoid and terpene profiles. Each strain selected by the Company's Cultivation Director to be grown by our team has been shown to effectively target one of the many niche areas in the non-edible dry flower markets . Certain strains are known to produce different effects on its consumers. The following is a select list of varieties that the facility seeks to cultivate:

- Cannatonic (CBD)
- Otto (CBD)
- Blue Dream (H)
- Jack Herer (S)
- OG Kush (H)
- Stardawg (H)
- Island Sweet Skunk (S)
- Northern Lights (I)
- Bubba Kush (I)

Financials

The financial model attached is intended to provide high level information related to a cannabis grow operation. All numbers are estimates based on the size of the proposed grow operation and marketplace factors. Assumptions are provided for certain categories that were used in arriving at the estimated amounts. External factors including government regulations, market forces, labor costs, and/or availability of resources may cause material changes to financial estimates. The client is advised to consult their tax professionals to fully understand considerations related to the cannabis business. This analysis does not constitute tax advice or make any warranties that should be relied upon with respect to tax laws.

However, the following will be generally true with respect to the proposed cannabis business, and the financial model is guided by the assumptions made below :

- Capital financing is generally not as available for property, plant & equipment as with most other businesses
- All funding will be provided by the ownership with the exception of loans made to the business by friends and family.
- The only allowable deductions may be Cost of Goods Sold in arriving at taxable income
- Banking is typically limited to certain institutions and more expensive

Structure of Financial Model

The financials are set to begin in year 0, where the application is being constructed, submitted and approved. This period estimates the time between when the Commission is to receive the application and when a provisional license is granted. Due to the nature of uncertainty in estimating the grant of a license the model uses numerical months and years in lieu of calendar months and years. Year 1 shall outline the portion of time between provisional to operational, including a buildout phase, staff training, and general business set-up. Year 2 shall see the beginning of the cultivation cycle and generate revenue 6 months into Year 2, and forward indefinitely. The figures are estimated based on experience; though for their speculative nature should naturally only be taken as educated estimates.

Budgeting Notes & Assumptions

Revenue

- At full production, annual revenue is estimated at \$3,120,000 (\$260,000 monthly)
- Full production monthly revenue estimate, conservatively taken, is comprised of \$250,000 monthly revenue for “Bud” and \$10,000 monthly revenue for “Trim”
- Revenue is estimated based on the following being produced every two weeks:

- 50 lbs. of “Bud” at \$2,500 per pound (current MA rate is \$3200-\$4200 for top end)
- 10 lbs. of “Trim” at \$500 per pound
- The revenue estimate calculated at four weeks per month (48 total weeks) in order to be conservative and allow for variances (actual revenue may reflect 52 weeks)
- Market conditions, state regulatory requirements and/or changes to federal law may also affect revenue in future years in either direction
- As it will take approximately one year from project commencement to begin growing, no revenue is estimated for Year 1

J – B.A.M., Inc. Financial Model				
ACCOUNT NAME	Year 0	Year 1	Year 2	Year 3
Volume (lbs)				
Flower	0.00	0.00	700.00	1,200.00
Trim	0.00	0.00	140.00	240.00
Price per Unit				
Flower	2,500.00	2,500.00	2,500.00	2,500.00
Trim	500.00	500.00	500.00	500.00
Revenue				
Flower	0.00	0.00	1,750,000.00	3,000,000.00
Trim	0.00	0.00	70,000.00	120,000.00
Total Revenue	0.00	0.00	1,820,000.00	3,120,000.00
Total Prebuild Capital Expenses	55,202.00	162,749.92	0.00	0.00
Total Other Capital Expenses	0.00	1,180,400.00	0.00	0.00
Total Cost of Goods Sold	0.00	312,501.30	1,591,405.20	1,640,878.32
Gross Margin (Revenue Less COGS)	0.00	(312,501.30)	228,594.80	1,479,121.68
Total Variable Costs	0.00	4,982.00	45,376.00	35,792.00
EBIDTA	0.00	(317,483.30)	192,548.80	1,443,329.68



PEARSON WALLACE
INSURANCE, LLC

March 15th, 2020

J-B.A.M., INC
71 Downing Parkway
Pittsfield, Ma 01201

Subject: Cannabis Insurance Commercial Insurance Coverage

Dear Mrs. Monique Palazzi,

It has been a pleasure working with you and your team to determine the best commercial insurance products for J-B.A.M, INC's cannabis operation in Pittsfield, MA. Pearson Wallace Insurance LLC works with commercial insurance carriers who specialize in cannabis risk analysis and prevention. We will be putting the following coverages in place for J-B.A.M:

General Liability Coverage:

- \$1,000,000 per occurrence
- \$2,000,000 in aggregate.
- The deductible for each policy can be no higher than \$5,000 per occurrence.

Product Liability Coverage;

- \$1,000,000 per occurrence
- \$2,000,000 in aggregate.
- The deductible for each policy can be no higher than \$5,000 per occurrence.

Please let me know if you have any questions or if you need further information from me. You have an amazing operation and team; we look forward to working with you.

Best Regards,

Beth Pearson

25 Henry Ave, Pittsfield 01201

11 Amity St, Amherst 01002

T. (413) 464-9390 F. (413) 464 0625 W. PearsonWallace.com

Separating Recreational from Medical, not applicable

The applicant, J-B.A.M., seeks only a cultivation license under 935 CMR 500, and thus shall not cultivate any cannabis for use medically. Compliance with the regulations, for cultivating marijuana, requiring the separation of recreational and medical cannabis; this shall be completed, by default, for the non-production of medical cannabis. There is no necessity for J-B.A.M. to consider policies or procedures for separating recreational and medical cannabis practice. This document provides notice of J-B.A.M.'s default compliance with the CCC's requirement that recreational and medical cultivation practices are separated, by nature of the non-cultivation of medical cannabis.

Qualifications and Training

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Scope

This section describes the policies and procedures of J – B.A.M., Inc. (“J-BAM” or the “Company”) with respect to its Staffing and Training. Policies and procedures which have been established in compliance with 935 CMR 500.105 (2), in addition to describing secure transportation measures not explicitly required by 935 CMR 500. The following Table of Authorities has been provided for the purposes of ease of assessment. Each requirement made express under 935 CMR 500 is tabled with the page number of the application where its respective compliance can be found. This table does not eliminate the possibility that the 935 CMR 500 requirements are found to be complied with elsewhere in this document. The table serves solely to ease assessment of regulatory compliance, not to self-impose a limited review on the application process.

REGULATIONS

935 CMR 500.105(2)(a)	3
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Personnel Policies and Training

The Company is committed to recruiting and hiring local top-quality agents whose background and experience match each position's requirements per the job description. The Company is also establishing itself as a veteran-centric company committed to creating jobs, offering training, and leveraging the skills possessed by veterans who have served the country in innumerable ways.

The Company will not consider applicants with industry experience unless such experience gained by working in legalized organizations. All candidates will submit to an extensive background check which includes: criminal background investigations, obtaining reference checks on previous employment, verifying educational history, conducting drug testing, verifying eligibility for lawful employment in the U.S. and obtaining motor vehicle records when applicable. Any applicant's refusal to submit to drug screening will immediately eliminate their candidacy.

Eligibility: All agents or volunteers will be registered with the CCC before they can work or volunteer for the Company. Company will not hire agents or engage volunteers that have a criminal history or are under the age of 21. All agents and volunteers will submit to a thorough background check. Any volunteer or agent unwilling to participate in the background check process will be eliminated from the hiring process.

Records: Each agent's personal records will be stored both electronically and in paper form. Access to these records will be limited to authorized personnel only. Physical copies will be stored in the Record Storage Room. Electronic copies will be stored electronically on a password protected cloud-based server. Company is committed to maintaining a transparent and fully accountable set of related Agent records for internal and external audits, and for review by CCC at all times. All records of agent training and certifications will also be maintained by HRD in the agent's personnel file. Agent application materials including their resume, list of professional references, copy of Commission issued badge, proof of age (21+) as well as related Background Check materials will also be stored within the agent's personnel file.

Employee Training

The Company's training program has been developed into three training categories: core training, including training by a certified Responsible Vendor Training program under 935 CMR 500.105(2)(b), functional training, and continuing education training, which includes shadowing

and on-the-job training for specific job requirements. Prior to the training start date, each agent will undergo a needs and skills analysis to determine the agent's level of experience and competence for their assigned job functions. Functional training is designed to be malleable and take an agent's skills and competencies into account when designing the training program, tailoring the roles and responsibilities to each agent's job functions; agents whose responsibilities involve interacting with a Seed-to-Sale SOR will receive training specific to that duty. All agents shall be trained prior to performing any job functions. All training will be monitored and documented to ensure that all agents are meeting their training objectives and that the content of this training will be made available to the Commission if requested. 935 CMR 500.105(2)(a). Prior to licensure, the company shall require all current owners, managers, and employees to the Responsible Vendor Training program, in addition to the in facility training described below. 935 CMR 500.105(2)(b)(1).

Core Training: The Company's core training begins with the Company's initial agent onboarding training process. Each new agent will participate in orientation within 5 days of initial hire. In this training, each agent will be provided with a copy of the Agent Handbook; Policy and Procedures; Safety Plan; HACCP Compliance Policies; Agent Code of Conduct; an overview of State and Federal marijuana laws and regulations; and a written explanation of all expectations to maintain a professional work environment. Onboarding training process explicitly includes training on the Commission's rules and regulations, the policies and procedures found in the Agent Handbook, and the Company's mission and guiding principles. This training program is supplement the responsible vendor training, and to create a corporate culture grounded in the compliance of state law and Company's values that will create an engaging and rewarding work environment for all agents. All owners, managers, and employees must attend a certified Responsible Vendor training program, prior to performing any job functions and within 90 days of hire, and annually thereafter. 935 CMR 500.105(2)(b)(2); 935 CMR 500.105(2)(b)(3).

Functional Training: Every agent and any volunteers will be trained in specific job functions that will be crucial to the performance of their duties by their immediate supervisor and the agent's co-workers. Functional training stresses compliant, ethical behavior as a part of the standard operations in all parts of the company.

As part of functional job training, the new agent will be paired with an experienced co-worker and a member of Management who will guide the new agent through the training process. The member of Management will be responsible for setting training goals and timelines for each aspect of the agent's functional training while the experienced co-worker will be responsible for physically completing the training process with the new agent. By requiring agents to conduct the new agent's training, Management hopes to periodically refresh every agent's knowledge base while building cohesion among all staff.

Continuing Education Training: The Company requires all agents to undergo eight (8) hours of continuing training each year. Management will conduct quarterly continuing training sessions at the production facility to provide agents with an opportunity to meet these requirements. In addition to this, all owners, managers, and employees shall complete a

Responsible Vendor Training program annually to maintain status as a Marijuana Establishment Agent. Management encourages agents to maintain a Personal Development Plan and actively work towards their professional development. The Company uses performance reviews as a tool to determine pay increases, promotions and discipline. The performance review is used to analyze the agent's work performance and to evaluate all strengths, areas for improvement, and job goals for the next review period. New agents will be required to undergo performance review on a quarterly basis for the first year of employment. All Company agents are required to participate in an annual performance review with their immediate supervisor and members of Management.

Training Assessment: Each training (Core, Functional or Continuing) will require agents to complete a post-training assessment. These assessments will allow agents to demonstrate their knowledge by passing a test with a mixture of multiple choice and written questions. No fewer than 20 exam questions will be derived from each training section. In the event that an agent does not answer all questions correctly, the agent will review the section from which the question(s) were derived and answer five subsequent questions on that section. Agents will not be able to work within the facility if they are unable to pass job-specific training assessments.

Agent Workplace Expectations

The Company expects every agent to act in a professional manner. Satisfactory performance of job duties and responsibilities is key to this expectation. Agents should attempt to achieve their job objectives, and act with diligence and consideration at all times. Poor job performance will result in disciplinary action, up to and including termination.

Workweek and Business Hours

The Company's business hours are 9:00 am to 7:00 pm. The normal shift of eight (8) hours includes a lunch period of thirty (30) minutes. Administrative and support staff are expected to work normal business hours in order to ensure smooth business operations. Overtime wages are not paid unless specified in the agent's employment agreement. Agents may arrange alternate work schedules and locations with the approval of their manager.

Agent Security Training

The Company's CSO is responsible for developing and implementing a security training program for all agents. The security training program will cover basic security policies and procedures that each agent is required to understand and follow while working on the facility premises, including the basic layout and function of the security system and the proper response procedures in the event of a security breach. All security training will emphasize implementing preventative measures that promote personal safety and protect cash, inventory, and other Company property. Security training will also include crime recognition and prevention techniques and proper procedures for theft and diversion response. All agents must be trained on the Company's security procedures before they can begin work and they must complete annual retraining as part of the Company's continuing training process.

Emergency Response Training

Emergency Prevention and Response

As part of its commitment to the safety of all consumers, caregivers, and agents, the Company will provide all registered agents with the knowledge and training to anticipate, recognize, and react to emergencies that may occur at the Compassion Center. Pre-event preparation, training, and access to readily available information and safety equipment are critical to minimizing consequent injuries and deaths and help to promote overall workforce resilience.

Emergency Anticipation: The first step to handling emergencies at the Compassion Center will be to anticipate the types of emergencies that could arise on the premises. The Company understands that this step is important considering that many marijuana consumers suffer from debilitating, life-threatening illnesses and may need attention while at the Compassion Center. Management will research possible emergencies based on marijuana-qualifying conditions and symptoms such as heart attacks, choking, seizures, and loss of consciousness. Moreover, the Company will ensure that the Compassion Center will be equipped with emergency equipment, such as first aid kits. Additionally, Management will ensure that emergency information is posted throughout the facility so that those tools are easily accessible in the event of an emergency.

Emergency Identification: The next step to handling emergencies at the Compassion Center is to train all agents to identify possible emergencies. Management will partner with the Red Cross of Massachusetts to develop training materials based on previous research, Red Cross workplace emergency standards, and OSHA's Emergency Preparedness and Response Standards. These training materials will include written agent testing to ensure agent information retention and will be included in all agents' onboard training and ongoing, semi-annual training sessions.

Emergency Response: The final step in the Company's emergency response plan is to train all members of management and agents on proper emergency reaction procedures. All members of Management and specific Compassion Center agents will be Cardiopulmonary Resuscitation ("CPR") certified with the Red Cross.

In the event of an emergency on the Company's premises, agents will be trained to adhere to the following procedures:

- If an emergency is reported, dial 9-1-1 and request an ambulance. Provide the following information:
 - Number and location of victim(s)
 - Nature of injury or illness
 - Hazards involved
 - Nearest entrance (emergency access point)
- Alert trained agents (members of the response team) to respond to the victim's location and bring a first aid kit or AED
- Only trained responders should provide first aid assistance.
- Do not move the victim unless the victim's location is unsafe.
- Control access to the scene.
- Take "universal precautions" to prevent contact with body fluids and exposure to blood borne pathogens.

- Meet the ambulance at the nearest entrance or emergency access point; direct them to victim(s).

Fire Safety: The Company's Fire Safety Plan includes the development of policies and procedures, agent training materials, and facility design features as well as proper installation and maintenance of fire safety equipment in order to ensure the safest environment for all individuals at the Compassion Center.

Fire Safety Training: During agent initial intake training, all registered agents and members of Management will be trained on the proper reaction procedures in the event of a fire at the facility. The Company's fire reaction training will include the location of the Compassion Center's fire exits and the designated safe meeting place as well as strict procedures for leading and directing consumers, caregivers, and Compassion Center visitors to the designated safe meeting place. All agents will be trained on the location and hands-on operating instruction for the Compassion Center's many fire extinguishers, and all fire extinguishers will be inspected by a licensed fire extinguisher service company on a quarterly basis to ensure functionality.

Fire Safety Training will address topics including:

- Individual roles and responsibilities;
- Threats, hazards, and protective actions;
- Notification, warning, and communications procedures;
- Means for locating individuals in an emergency;
- Emergency response procedures;
- Evacuation, shelter, and accountability procedures;
- Location and use of common emergency equipment such as fire extinguisher and facility fire alarms; and
- Emergency shutdown procedures

Fire Prevention: The Company's training materials will include materials to educate agents on proper fire prevention techniques as recommended in OSHA's Fire Safety in the Workplace guidance. During initial intake training, the Company will train all agents on fire prevention procedures and techniques to ensure that fire risk is at a minimum. Fire prevention and response training will also be incorporated into semi-annual training sessions as the Company works to perfect policies and procedures. Representatives from the local fire CCC will be asked to provide additional training and insight as further information becomes available.

Fire Response: Management will develop a fire emergency action plan including an easy-to-read map of the facility with a clearly marked path to a designated safe meeting place outside of the facility's building and the location of all facility fire extinguishers. The evacuation plan map will be posted throughout the facility as an easy reference for individuals in the event of a facility fire.

Evacuation Procedures for Uncontrollable Fires: All members of Management and agents will be trained on the following procedures in the event of an uncontrollable fire at the Compassion Center:

- Leave the area of danger. DO NOT stay to fight a large fire;
- Rescue any agent, consumer, caregiver, or visitor in immediate danger;

- On your way out, if it can be done safely, turn off equipment and move any explosive or flammable materials away from possible contact with hot surfaces or other sources of ignition;
- Transmit the fire alarm by pulling the nearest fire alarm box in the facility, notify other personnel at the facility (if possible), and when you have reached a safe location, call 9-1-1
- Leave by means of one of the predetermined evacuation routes for your facility area.
- If possible, confine the fire by closing doors as you leave.
- Evacuate promptly and meet outside the building away from the entrance at a predetermined place.
- Conduct an attendance/person count of workers and make sure all are accounted for; and
- Cooperate with all emergency service personnel and provide any pertinent information upon request.

Fire-fighting Procedures for Controllable Fires: Members of management and agents that are trained to use the proper firefighting equipment will adhere to the following procedures:

- Transmit the fire alarm by pulling the nearest fire alarm box in the facility
- The decision of whether to fight the fire oneself or to wait for fire-fighting help must be made according to the type and size of the fire, its location and the circumstances of the fire.
 - A small fire in a container may be easily snuffed out by the placement of a nonflammable cover across the container opening. A small fire in an area free of other fuels can be extinguished with appropriate available fire extinguishers before calling for help.
- When extinguishing a burning solid, direct the extinguisher discharge at the base of the flame; in the case of burning liquids, direct it at the leading edge. Larger or rapidly growing fires are best left to the Fire CCC.
- To extinguish a minor fire with an extinguisher:
 - Pull Pin
 - Aim nozzle at base of fire
 - Squeeze handle
 - Sweep from side to side

Facility Design and Equipment: Facility fire exits will be clearly marked and well lit, wide enough to accommodate a number of evacuating individuals, unobstructed and clear of debris at all times, and unlikely to expose evacuating individuals to additional hazards. Fire alarm emergency boxes will be stationed throughout the facility so that individuals on the Company's premises are always within reach in case of a fire emergency. Furthermore, the Company will regularly and properly maintain fire safety equipment and systems installed on heat-producing equipment to prevent the accidental ignition of combustible materials. These vital maintenance procedures will be included in the written fire prevention plan taught to all agents and maintained at the facility premises at all times.

Hazard Analysis Critical Control Points: The facility that incorporates HACCP training in order to install a product safety monitoring system which is used to identify and control

Illogical, chemical, and physical hazards within the storage, transportation, use, preparation, and sale of goods. The company has adapted this protocol from food safety monitoring systems, by which hazardous risks are minimized or eliminated. These policies incorporate identifying critical control points in the process of cultivation.

Chemical Spill Training: The Company is committed to developing procedures for preventing and properly handling chemical spills on the facility premises. Management will develop and implement a written safety and health program that identifies, evaluates, and controls safety and health hazards and provides emergency response procedures for proper cleanup, storage, and disposal. Such training materials will familiarize agents and members of Management with specific chemicals used at the facility and how to properly prevent harmful chemical spills. The training plan will be based on OSHA's Hazardous Waste Operations and Emergency Response and will include an organizational work plan, site evaluation and control, a site-specific program, information and training program, personal protective equipment program, monitoring, surveillance program, decontamination procedures, and an emergency response program. All Compassion Center agents will be trained on these topics during the onboarding process and ongoing during semi-annual training sessions as new information and procedures become available.

All agents will be trained to clean up simple chemical spills they cause or encounter in the Compassion Center's operations. After cleaning up a spill, the cleaning agent will prepare documentation of the event that includes relaying the specific conditions of the spill and the subsequent cleanup. Such documentation can be used to avoid similar instances in the future. The Company will amend its chemical handling and any other standard operating procedures shown to be deficient in the aftermath of a chemical spill.

All members of Management and agents will be trained on the following chemical spill reaction procedures:

Procedures for minor chemical spills:

- Alert people in the immediate area of spill;
- If spilled material is flammable, turn off ignition and heat sources;
- Open outside windows, if applicable;
- Wear protective equipment, including safety goggles, gloves and long-sleeved lab coat or other Company-provided covering;
- Avoid breathing vapors from spill;
- Confine spill to as small an area as possible;
- Do not wash spill down any facility drains;
- Use appropriate spill kits/sorbents to neutralize corrosives and/or absorb spill.
- Collect contaminated materials and residues and place in a pre-approved chemical-spill container.
- For powdered chemicals carefully sweep the powder to avoid generation of dust or, if appropriate, use moist sorbent pads or wet the powder with a suitable solvent and then wipe with a dry cloth.
- Label and manifest waste and contact on the provided document for proper disposal;
- Clean spill area with water; and
- Report the spill to your immediate supervisor or on-duty Management.

Procedures for a major chemical spill:

- Attend to injured or contaminated persons and remove them from exposure;
- Alert people in the laboratory to evacuate;
- If spilled material is flammable, turn off ignition and heat sources;
- Call 9-1-1 for assistance immediately after you have ensured your own safety;
- Close doors to affected area;
- Report the incident to your immediate supervisor or on-duty Management, and post warnings to keep people from entering the area; and
- Wait for emergency personnel.

Threatening Event

Site Security

- All entryways must be keyed, and controlled from the inside.
- Outside doors must be self-closing.
- Exterior building doors are constructed of metal, and locking areas are tamper resistant.
- Emergency doors must remain closed at all times except in case of emergency.
- Company vehicles are secured and locked inside the parking lot when not in use.
- Loading and unloading docks and doors are closed and secure at all times except when loading and unloading trucks.
- Security is present when loading and unloading trucks.
- Access to facility keys and codes is restricted to assigned personnel.
- Access to utilities such as gas supplies, water supplies and related treating/monitoring equipment, electrical equipment, airflow devices, and storage tanks is restricted to assigned personnel.
- Access to the Warehouse is restricted to assigned personnel. Warehouse doors must be secured and checked after all responsible agents left the site.
- Security is responsible to close and lock the gate of the parking lot after the final shift every weekday and during weekends.

Threatening Event Training

The Company is aware of the possibility that threatening events may occur on the Compassion Center's premises and is committed to training all agents and members of Management on how to respond to such scenarios. Management will compile information and guidelines on crime prevention taken from the United States CCC of Labor's Workplace Violence Program, the CDC's Workplace Violence Prevention Strategies and Research Needs, and the National Crime Prevention Council's Workplace Safety standards. Threatening events training will occur during every agent's initial intake training period. Management will continually research and update threatening events procedures and will partner with local law enforcement to update the Compassion Center's procedures. Changes in threatening events training plans will be communicated to all agents and members of Management during ongoing, semi-annual training sessions as information becomes available.

The Company's Management will be responsible for designing and implementing a personal security training program for agents and members of Management. All agents will be given

personal security training through the program developed by Management prior to beginning work at the Compassion Center. Furthermore, all agents will be required to undergo annual, continuing security training on proper procedures for responding to robberies, larcenies, and burglaries on the facility premises. This training will include the basic layout and function of the security system and procedures to follow in the event of a robbery or other incidents, work in concert with agent and Management knowledge to ensure consumers are maximizing the benefits of their marijuana treatments.

Agent Training Policies and Procedure

Training Overview: This Training Plan has been designed by Company's Management to align the Company's training efforts and resources with its core principles and strategic goals. This Plan establishes the means by which Company's Management will provide initial and ongoing training to ensure that all Company's agents will conduct themselves in a way that comports with the best interests of the Company and the registered consumers it serves. The object of this plan is to familiarize new agents with the Company's goals and guiding principles, and to instill these goals and principles into the day-to-day operations of the Company.

All of the Company's training materials are designed to further the implementation of the Company's mission and guiding principles outlined in the initial intake training program. Company's continuing training program is designed to reinforce the agent's commitment to the Company's mission, vision, and goals. Each agent is expected to complete at least 8 hours of continued training annually. Training will take place in various formats including in-person seminars and trainings, web-based content, external courses and trainings where applicable, mentorship, and through formal assessment. The core of Company's Training Program is the initial onboarding training, which every agent will undergo prior to working. Management will ensure that every agent has constant access to training materials that will make them better agents and, potentially, candidates for internal promotion.

Company's mission is to serve the needs of consumers with care and compassion while developing a stable, professional marijuana industry in MA. The requirements set forth in this Plan will apply to all of the Company's agents and Management without exception. The Human Resources Director is responsible for coordinating all agent training. Specific training components, such as safety and security features, will be supported by the respective Director.

Training Structure: This Training Plan will outline the methods by which Company's Management will align training methodology to the Company's mission and principles. By introducing these concepts to new agents from the outset of their employment, Management hopes to instill the Company's mission and principles into the agents every action while working at Company. Every agent must be aware that the marijuana industry across the nation, and especially in Massachusetts, is under great scrutiny. If all agents act with the Company's

mission in mind, then Company will stand out as a beacon of professionalism and compassion in the Massachusetts marijuana industry.

Company's training program has been developed into three training categories: core training, functional training and continuing education training, which includes shadowing and on-the-job training for specific job requirements. Prior to the training start date, each agent will undergo a needs and skills analysis to determine the agent's level of experience and competence for their assigned job functions. Functional training is designed to be malleable and take an agent's skills and competencies into account when designing the training program. All training will be monitored and documented to ensure that all agents are meeting their training objectives and that the content of this training will be made available to the Commission if requested.

Core Training: The Company's core training begins with the Company's initial agent onboarding training process. Each new agent will participate in orientation within 5 days of initial hire. In this training, each agent will be provided with a copy of the Agent Handbook; Policy and Procedures; Safety Plan; HACCP Compliance Policies; Agent Code of Conduct; an overview of State and Federal marijuana laws and regulations; and a written explanation of all expectations to maintain a professional work environment. Onboarding training process explicitly includes training on the Commission's rules and regulations, the policies and procedures found in the Agent Handbook, and the Company's mission and guiding principles. This training program is supplement the responsible vendor training, and to create a corporate culture grounded in the compliance of state law and Company's values that will create an engaging and rewarding work environment for all agents. All owners, managers, and employees must attend a certified Responsible Vendor training program, prior to performing any job functions and within 90 days of hire, and annually thereafter.

Core training exists to cover topics relevant to each agent in the facility. The enumerated training structure below shall supplement the Responsible Vendor Training that all owners, managers, and employees shall complete annually. At a minimum, these in-facility trainings will include:

1. Professional Conduct and Ethics
2. State and Federal Laws:
3. Informational Developments in the cannabis industry
4. Proper Use of Security Measures and Controls that have been Adopted
 - a. Standard Operating Procedures
 - i. METRC Training
 - b. Security Procedures
 - c. Regulatory Compliance
 - i. Regulatory Overview
 - ii. Standards of Care
 - iii. Compliance Auditing
5. Specific procedural instructions for responding to an emergency, including robbery or violent accident.
 - a. Safety Procedures

- i. Emergency
 - ii. Fire
 - iii. Chemical Spill
 - iv. OSHA Training
 - v. MSDS Training
 - vi. Panic Button Training
 - vii. Threatening Event
- 1. Robbery
 - 2. Invasion
 - 3. Burglary
 - 4. Other criminal incidents

Functional Training Overview:

Every agent and any volunteers will be trained in specific job functions that will be crucial to the performance of their duties by their immediate supervisor and the agent's co-workers. The training stresses compliant, ethical behavior as a part of the standard operations in all parts of the Company. Functional trainings are specific to each unique department within the Company including: Cultivation Operations, harvest, post harvest, cleaning and sanitation, inventory control document control, QA/QC

As part of functional job training, the new agent will be paired with an experienced co-worker and a member of Management who will guide the new agent through the training process. The member of Management will be responsible for setting training goals and timelines for each aspect of the agent's functional training while the experienced co-worker will be responsible for physically completing the training process with the new agent. By requiring agents to conduct the new agent's training, Management hopes to periodically refresh every agent's knowledge base while building cohesion among all staff.

All the members of the training team are responsible for documenting the progress of the new agent's training and the member of Management will report to the rest of Management regarding the new agent's development. The members of the training team will work with the new agent for no less than six months after being hired. Even after the new agent is ready to begin working independently, they will still be subject to quarterly performance reviews for the first year of employment. The senior members of the training team will continue to mentor the new agent as they begin to build their career with Company and the new agent will be able to continue to learn and develop after the initial training has been completed.

Top 10 Functional Training Topics:

- 1. Cultivation Operation.
- 2. Facility and workplace Safety and Controls
- 3. Sanitation and Integrated Pest Management
- 4. Security and Diversion Prevention
- 5. Transportation and Storage Procedures
- 6. Record Keeping and Software training, Metrc training
- 7. Product Management and Workflow from Seed-to-Sale
- 8. CCC Specific Operation Workflow
- 9. Management & Executive Training

Functional Training shall include not only safe industry-leading practices for the cultivation of marijuana product, but also the requirements for the maintenance of a clean cultivation area, and ensuring that the facility's buildout complies with the necessary regulations to maintain operational

For example, part of the facility's functional training shall include training all Marijuana Establishment Agents involved with the cultivation of marijuana products to comply, as required, with the following sanitary requirements: 935 CMR 500.105(3)(b).

1. Training sufficient to meet the requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements;
2. Training for those who come into direct contact with marijuana to the following sanitary practices while on duty, including:
 - a. Maintaining adequate personal cleanliness; and
 - b. Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
3. Hand-washing facilities shall be adequate and convenient and shall be furnished with running water at a suitable temperature. Hand-washing facilities shall be located in the Marijuana Establishment in production areas and where good sanitary practices require employees to wash and sanitize their hands, and shall provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
4. There shall be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. Litter and waste shall be properly removed, disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal shall be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
6. Floors, walls, and ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair;
7. There shall be adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. Buildings, fixtures, and other physical facilities shall be maintained in a sanitary condition;
9. All contact surfaces, including utensils and equipment, shall be maintained in a clean and sanitary condition. Such surfaces shall be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils shall be so designed and of such material and workmanship as to be adequately cleanable;
10. All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products;

11. A Marijuana Establishment's water supply shall be sufficient for necessary operations. Any private water source shall be capable of providing a safe, potable, and adequate supply of water to meet the Marijuana Establishment's needs;
12. Plumbing shall be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the Marijuana Establishment. Plumbing shall properly convey sewage and liquid disposable waste from the Marijuana Establishment. There shall be no cross-connections between the potable and wastewater lines;
13. A Marijuana Establishment shall provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
14. Products that can support the rapid growth of undesirable microorganisms shall be held in a manner that prevents the growth of these microorganisms; and
15. Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers.
16. All vehicles and transportation equipment used in the transportation of marijuana products or edibles requiring temperature control for safety must be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the marijuana products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c).

Continuing Education Training: Company requires all agents to undergo eight (8) hours of continuing training each year. Management will conduct quarterly continuing training sessions at the production facility to provide agents with an opportunity to meet these requirements. In addition to this, all owners, managers, and employees shall complete the Responsible Vendor Training program annually; the following training shall supplement the CCC's requisite training. Management encourages agents to maintain a Personal Development Plan and actively work towards their professional development. The Company uses performance reviews as a tool to determine pay increases, promotions and discipline. The performance review is used to analyze the agent's work performance and to evaluate all strengths, areas for improvement, and job goals for the next review period. New agents will be required to undergo performance review on a quarterly basis for the first year of employment. All Company agents are required to participate in an annual performance review with their immediate supervisor and members of the Management Team.

Where relevant, Company will promote and support skills-based job training programs for all eligible agents in the form of an apprenticeship. If available and appropriate, the Company will seek out and enroll its agents in training mechanisms that include on-the-job, operation-specific mentorship from senior agents combined with off-site classroom time for agent continuing education. As these cannabis-specific programs may not exist currently, the Company will work with public and private entities to support and then promote these beneficial, legitimizing programs.

Company will also continue assessing the marijuana market for certifiable courses and industry-specific schools that will help to keep all agents current on changing regulations, advancements, and knowledge about the medicines our company is creating.

Instructional Methods:

Company's training program is designed to be diverse, engaging and comprehensive. Company will utilize the Socratic Method of teaching for all of its training activities. Company's Management believes that this methodology fosters an environment of communication while exploring the theoretical underpinnings of the training.

Company will also provide all agents with access to online training courses produced by industry leaders in other legal marijuana states as well as seminars and live training sessions being developed by various national marijuana industry educators. Content will be accessible, in most cases, online for easy agent access. Non-marijuana industry training programs for Quickbooks, Contact Relations Management (CRM) software, project management software, and other platforms will be provided to agents whose job responsibilities require such training. Online training programs will be the preferred educational format for all computer and IT related trainings that will require continuous computer usage. Web-based training enables agents to access a wide variety of educational materials at low cost to the dispensary.

Some content will be provided in print form so that the agent has a tangible copy of this information. Printed content will be provided in the former of a binder, issued to each individual agent. Agents will be given a binder with laminated copies of the SOP's that pertain to their position. These materials will remain the property of the Company and may not be removed from the facility. They will be returned to management upon completion of training. Training manuals will always be available on site for reference in each work area.

As new content becomes available, agents will be notified in several ways, depending on the magnitude of the change. For minor adjustments to the training curriculum, agents will be notified in writing or by email. Memos will also be posted in public places, such as the Company break room. For adjustments that require an immediate change to a company-wide procedure, such as an amendment to safety procedures, a company-wide meeting or department-wide meeting will be held and each agent's attendance will be recorded. Agents not in attendance will be required to attend an update meeting before returning to work. For job-specific changes, the lead or Director of such division, will be responsible for developing a training for impacted agents, recording attendance, and updating all related training documents.

Training Assessment

Each training (Core, Functional or Continuing) will require agents to complete a post-training assessment. These assessments will allow agents to demonstrate their knowledge by passing a test with a mixture of multiple choice and written questions. No fewer than 20 exam questions will be derived from each training section. In the event that an agent does not answer all questions correctly, the agent shall review the section from which the question(s) were derived and answer five subsequent questions on that section. Agents will not be able to work within the facility if they are unable to pass job-specific training assessments.

Job Description and Qualifications

Chief Executive Officer

Summary: Plans and directs all aspects of the organization's strategies, objectives, initiatives and policies. This role is responsible for the attainment of short and long-term financial and operational goals as directed by the Board of Directors. This person will lead and direct the activities of Cultivation Operations including, but not limited to: quality control, safety, state regulatory compliance, human resources, operations, financial, and product development. Oversees all aspects of the Company in strict compliance with Massachusetts regulations and builds a high performance team capable of achieving our vision and mission while adhering to our core values. Ensures that all systems and procedures are in place that provide for the manufacture of safe, high quality product in strict adherence to Massachusetts regulations. Responds to alleged violations of rules, regulations, policies, procedures, and Standards of Conduct by following up on recommended investigative procedures. Regularly meets with local and state officials to update progress and seek feedback

Essential Duties and Responsibilities

- Achieving short and long-term financial and operational goals
- Direct and manage the work activities performed in the areas of Cultivation, Manufacturing, and Operations including quality control, safety, regulatory compliance, HR, and operations

Supervisory Responsibilities

- All Director Level Management

Physical Requirements

- Long periods of prolonged sitting and standing
- Requires normal range of hearing,

Work Environment

- Moderate noise level similar to a typical busy office environment
- Varied hours and/or days, including nights, days, holidays, or weekends

Chief Operating Officer/ Facilities Manager

Summary: Plans and directs all aspects of the organization's strategies, objectives, initiatives and policies. This role is responsible for the attainment of short and long-term financial and operational goals as directed by the Board of Directors. This person will lead and direct the activities of Cultivation Operation including, but not limited to: quality control, safety, state regulatory compliance, human resources, operations, financial, and product development. Oversees all aspects of the Company in strict compliance with Massachusetts regulations and builds a high performance team capable of achieving our vision and mission while adhering to our core values. Ensures that all systems and procedures are in place that provide for the manufacture of safe, high quality product in strict adherence to Massachusetts regulations. Responds to alleged violations of rules, regulations, policies, procedures, and Standards of Conduct by following up on recommended investigative procedures. Regularly meets with local and state officials to update progress and seek feedback

Essential Duties and Responsibilities

- Achieving short and long-term financial and operational goals
- Direct and manage the work activities performed in the areas of Cultivation, Manufacturing, and Operations including quality control, safety, regulatory compliance, HR, and operations

Supervisory Responsibilities

- All Director Level Management

Physical Requirements

- Long periods of prolonged sitting and standing
- Requires normal range of hearing,

Work Environment

- Moderate noise level similar to a typical busy office environment
- Varied hours and/or days, including nights, days, holidays, or weekends

Chief Financial Officer

Summary:

Responsible for managing all financial aspects of the Company including, payroll, budget management, and maintaining financial records. Must analyze and present financial reports monthly and annually to the Board of Directors. Assists the CEO in analyzing all aspects of operations, and offers improvement initiatives including pricing adjustments. Ensures the Company follows all financial requirements for maintaining non-profit status.

Essential Duties and Responsibilities:

- Develops accounting organizational strategies by contributing accounting and financial information, analysis, and recommendations to strategic thinking and direction; establishing functional objectives in line with organizational objectives.
- Establishes accounting operational strategies by evaluating trends; establishing critical measurements; determining production, productivity, quality, and customer-service strategies to resolve problems and implement change
- Provides financial projections and coordinating budget/forecast preparation by collecting, analyzing, and consolidating financial information and advising departments on the collection and analysis of data
- Maintains sufficient funds by forecasting cash requirements and obligations
- Minimizes legally required taxes by studying regulations and presenting tax strategies to management
- Maximizes sales margin by recommending product and service pricing policies

Supervisory Responsibilities:

- Accounting Director

Physical Requirements:

- Standing and moving for 2-3 hours at a time
- Long periods of prolonged sitting and standing
- Requires normal range of hearing,

Work Environment:

- Moderate noise level similar to a typical busy office and warehouse environment
- Varied hours and/or days, including nights, days, holidays, or weekends
- Constant co-worker interactions

Human Resources Director

Summary:

Plans and administers policies relating to all phases of human resources activity by performing the following duties personally or through subordinate supervisors.

Essential Duties and Responsibilities:

- Identify legal requirements and government reporting regulations affecting human resource-functions and ensure policies, procedures, and reporting are in compliance
- Recruit, interview, test, and select agents to fill vacant positions; conduct new agent-orientation
- Keep records of: benefits plan participation such as insurance and pension plan, personnel transactions such as hires, promotions, transfers, performance reviews, and terminations, and agent statistics for government reporting
- Coordinate management training in interviewing hiring, terminations, promotions, performance review, safety, and sexual harassment
- Advise management in appropriate resolution of agent relations issues
- Administer performance review program to ensure effectiveness, compliance, and equity within organization
- Administer salary administration program to ensure compliance and equity within the organization
- Administer benefits programs such as life, health, dental and disability insurance, pension plans, vacation, sick leave, leave of absence, and agent assistance
- Investigating accidents and prepares reports for insurance carrier, and represent the organization at personnel-related hearings and investigations
- Conduct wage surveys; prepare budget of human resources operations.
- Prepare agent separation notices and related documentation, conduct exit interviews, prepare reports and recommend procedures

Supervisory Responsibilities:

- No direct reports.

Knowledge, Skills and Abilities Required:

- Ability to communicate clearly and accurately
- Must comply with state and federal regulations and guidelines

Physical Requirements:

- Standing and moving for 2-3 hours at a time; sitting for prolonged periods, some bending
- Hand-eye coordination and manual dexterity sufficient to operate a computer
- Requires normal range of hearing and manual dexterity
- May require lifting up to 50 pounds occasionally

Work Environment:

- Moderate noise level similar to a typical busy office and warehouse environment

- Varied hours and/or days, including nights, days, holidays, or weekends
- Constant co-worker interactions

Accounting Director

Summary:

Responsible for managing all accounting aspects of the Company including, payroll, budget management, bank records, reconciliations and maintaining financial records.

Essential Duties and Responsibilities:

- Organizes, coordinates and evaluates the activities of the Accounting and Finance Department to oversee the day-to-day accounting operations (AP, AR, Reconciliations, Month End)
- Establishes and implements policies, systems and procedures for internal controls
- Oversees the processing of a high volume of detailed data necessary for the preparation of monthly financial statements
- Responsible for payroll and government tax reporting
- Manages and maintains company's accounting records and related documents
- Develops, modifies and verifies accounting classifications of all expenditures and documents, including capital and leasehold improvements, in accordance with GAAP standards
- Oversees purchase requests against approved budgets for availability of funds prior to commitment, reviews contracts, SOWs, vendor quotes, and approves purchase order requests, as applicable
- Assists the Director of Finance in the review of proposed corporate plans and programs to provide financial forecasts and recommendations to management
- Pro-actively seeks ways to improve the department's internal systems and operating effectiveness
- Provides support for and assistance with audits, tax filings, budgets, cash flow management, and forecasting
- Evaluates financial performance and assists in the reporting and presentation of the results and findings
- Cultivates and maintains strong relationships with banking institutions and various government agencies

Supervisory Responsibilities:

- No direct reports.

Knowledge, Skills and Abilities Required

- Strong analytical skills and attention to detail
- Ability to multitask and prioritize competing priorities
- Discretion regarding confidential information

- Strong oral and written communication skills
- Retail accounting experience a plus with a strong understanding of COGS
- Strong proficiency in MS Office, especially Excel, and QuickBooks Financial Accounting Software
- Must comply with state regulations and guidelines

Physical Requirements:

- Standing and moving for 2-3 hours at a time
- Long periods of prolonged sitting and standing
- Requires normal range of hearing

Work Environment:

- Moderate noise level similar to a typical busy office and warehouse environment
- Varied hours and/or days, including nights, days, holidays, or weekends

Quality Control Director

Summary:

Responsible for oversight of all quality testing procedures. Accountable for the development, implementation and ongoing monitoring of the quality assurance and control systems in strict compliance with state regulations. Responsible for root cause investigations relating to deviations from Standard Operating Procedures or batches that fail testing requirements.

Essential Duties and Responsibilities:

- Develops, updates, and maintains Standard Operating Procedures (SOP) and Quality Manuals
- Supervises and is accountable for a team of Laboratory Technicians
- Interacts with production and department managers to create a cohesive, well run quality assurance program
- Oversees and assists Quality Control (QC) team with critical/technical review of documents, test results, procedures and production equipment
- Applies technical knowledge to troubleshoot production issues
- Reviews certificates of analysis and results of laboratory tests for compliance to specification
- Ensure compliance with regulations through auditing and quality systems
- Investigates product non-conformances; conduct material reviews for complaints, and document findings and responses.
- Manages product holds, reprocessing actions, and final disposition processes for noncompliant resources

Supervisory Responsibilities:

- Laboratory Team Leader

Knowledge, Skills and Abilities Required:

- Knowledge of the uses and benefits of cannabinoids
- Strong knowledge of State Marijuana Regulation, Good Manufacturing Practice, Regulatory and Environmental guidelines
- Ability to communicate clearly and accurately
- Must comply with state regulations and guidelines

Physical Requirements:

- Standing and moving for 2-3 hours at a time; sitting for prolonged periods, some bending;
- Hand-eye coordination and manual dexterity sufficient to operate a computer
- Requires normal range of hearing and manual dexterity sufficient to operate a cash register, computer, and telephone
- May require lifting up to 50 pounds occasionally

Work Environment:

- Moderate noise level similar to a typical busy office and warehouse environment
- Occasional exposure to loud trim machines (ear protection provided and available)
- Varied hours and/or days, including nights, days, holidays, or weekends
- Constant co-worker interactions

Informational Technology Director

Summary:

Directs and coordinates activities of workers engaged in computer operations by performing the following duties personally or through subordinate supervisors. Carries out supervisory responsibilities in accordance with the organization's policies and applicable laws.

Responsibilities include interviewing-hiring, and training agents; planning-assigning, and directing work; appraising performance; rewarding and disciplining agents; addressing complaints and resolving problems.

Essential Duties and Responsibilities:

- Plan and develop policies and procedures for carrying out computer operations
- Meet with subordinate to discuss progress of work, resolve problems, and ensure that standard-for-quality and quantity of work are met
- Adjust hours of work, priorities, and staff assignments to ensure efficient operation, based on workload
- Review daily logs and reports to detect recurring slowdowns or errors
- Consult with software and hardware vendors and other establishment workers to solve problems impeding computer processing
- Meet with users to determine the quality of service and identify needs
- Meet with personnel of the organization to determine the impact of proposed changes in hardware or software on computer operations and service to users
- Evaluate new software and hardware to determine usefulness and compatibility with existing software and hardware
- Evaluate proposed data processing projects to assess the adequacy of existing hardware, and recommend the purchase of equipment
- Develop budget and monitor expenditures
- Direct and coordinate the activities of storage library

Supervisory Responsibilities:

- None

Knowledge, Skills and Abilities Required:

- Demonstrate a collaborative work style and strong leadership skills
- Ability to make decisions and take proper action in difficult situations
- Good communication, organization, planning and clerical skills
- Must comply with state regulations and guidelines

Physical Requirements:

- Standing and moving for 2-3 hours at a time; sitting for prolonged periods, some bending
- Hand-eye coordination and manual dexterity sufficient to operate a computer
- Requires normal range of hearing and manual dexterity sufficient to operate a cash register, computer, and telephone
- May require lifting up to 50 pounds occasionally

Work Environment:

- Moderate noise level similar to a typical busy office and warehouse environment
- Varied hours and/or days, including nights, days, holidays, or weekends
- Constant co-worker interactions

CSO/Security Team Leader

Summary:

Responsible for daily surveillance duties, information gathering, site inspections and security at the Facility. Must perform routine patrols and assist in investigations regarding theft or diversion. Coordinates with management and law enforcement to assist with performing investigations.

Essential Duties and Responsibilities:

- Monitor surveillance cameras at control desk
- Utilize radio for communications
- Monitor suspicious activity and report all findings to supervisor
- Patrol areas of the facility (indoors and outdoors)
- Provide documentation and reports of any adverse incidents

Supervisory Responsibilities:

- Security Staff.

Knowledge, Skills and Abilities Required:

- Prior law enforcement experience, or military experience desired, but not required
- Must comply with state regulations and guidelines

Physical Requirements:

- Standing and moving for 2-3 hours at a time.
- Sitting for prolonged periods, some bending;
- Hand-eye coordination and manual dexterity sufficient to operate a computer
- Requires normal range of hearing and manual dexterity sufficient to operate a cash register, computer, and telephone. May require lifting up to 50 pounds occasionally.

Work Environment:

- Moderate noise level similar to a typical busy office and warehouse environment
- Varied hours and/or days, including nights, days, holidays, or weekends
- Constant interactions
- Indoor/outdoor job requirements required

Security Staff Member

Summary:

Responsible for daily surveillance duties, information gathering, site inspections and security at the Facility. Must perform routine patrols and assist in investigations regarding theft or diversion. Coordinates with management and law enforcement to assist with performing investigations.

Essential Duties and Responsibilities:

- Monitor surveillance cameras at control desk
- Utilize radio for communications
- Monitor suspicious activity and report all findings to supervisor
- Patrol areas of the facility (indoors and outdoors)
- Provide documentation and reports of any adverse incidents

Supervisory Responsibilities:

- No direct reports.

Knowledge, Skills and Abilities Required:

- Prior law enforcement experience, or military experience desired, but not required
- Must comply with state regulations and guidelines

Physical Requirements:

- Standing and moving for 2-3 hours at a time.
- Sitting for prolonged periods, some bending;
- Hand-eye coordination and manual dexterity sufficient to operate a computer
- Requires normal range of hearing and manual dexterity sufficient to operate a cash register, computer, and telephone. May require lifting up to 50 pounds occasionally.

Work Environment:

- Moderate noise level similar to a typical busy office and warehouse environment
- Varied hours and/or days, including nights, days, holidays, or weekends
- Constant co-worker interactions
- Indoor/outdoor job requirements required

Cultivation Director/Grow Team Leader/ Transportation Director

Summary:

Responsible for coordinating and implementing activities related to the vegetation stages of plant life. Responsible for managing the vegetation department within the Cultivation Facility. Hires and trains vegetation agents, prepare reports, and set specific department goals.

Essential Duties and Responsibilities:

- Acquire tools and set objectives for the Cultivation Facility
- Develop schedules and ensure they are adhered by the Grow staff
- Participate in developing specific policies and procedures
- Manage Grow Technician staff, delegate responsibilities and maintain agent records
- Hire-train-and-terminate workers as needed
- Attend and preside over meetings
- Manage and direct overall Growing operations
- Set goals for the Growing department
- Clearly communicate goals to Board Members
- Measure the success of the Growing department
- Generate and present reports to the direct supervisor on how goals are being met
- Participate in seminars and conferences related to the continuing education of work duties
- Motivate and encourage Grow Technicians
- Ensure high-quality for the Growing department
- Ensure the Growing department inventory is stocked with high-quality products, which are regularly replenished to guarantee uninterrupted flow of necessary goods required for operations

Supervisory Responsibilities:

- Grow Technicians

Knowledge, Skills and Abilities Required:

- Must comply with state regulations and guidelines

Physical Requirements:

- Standing and moving for 2-3 hours at a time
- Long periods of prolonged sitting and standing

- Requires normal range of hearing

Work Environment:

- Moderate noise level similar to a typical busy office and warehouse environment
- Varied hours and/or days, including nights, days, holidays, or weekends
- Constant co-worker interactions

Drying/Trimming/Packaging/Harvest/Transportation Agent

Summary:

Responsible for the care of marijuana plants during the immature, vegetative, and flowering stages. Responsibilities include pruning, planting, watering, feeding, and inspecting plants as well as labeling and tracking immature plants through the seed to sale tracking program. Responsible for implementing a mother plant program with oversight from the Cultivation Director.

Essential Duties and Responsibilities:

- Adhere to company mission statement and core values, while maintaining high ethical standards and professionalism by Implementing cultivation practices as indicated by Cultivation Director
- Trims plants
- Accurately weigh and record all wet trim weights
- Wash and sanitize all equipment
- Scout all equipment ensure all tools are free of pests, viruses or disease
- Break down and set up plant rooms
- Sanitize and swap all reservoirs assigned
- Demonstrate accuracy and thoroughness in order to uphold the Company's standard for quality
- Work in a timely manner and strive to increase productivity
- Maintain organization and sanitization of the greenhouse throughout the day
- Assist in government inspections with inventory and compliance audits
- All other job duties as assigned

Supervisory Responsibilities:

- No direct reports.

Knowledge, Skills and Abilities Required:

- Basic strain and plant structure knowledge
- Knowledge of the uses and benefits of cannabinoids
- Ability to communicate clearly and accurately
- High school diploma or some college
- Must comply with state regulations and guidelines
- Valid Massachusetts Drivers license

Physical Requirements:

- Standing and moving for 2-3 hours at a time; sitting for prolonged periods, some bending
- Hand-eye coordination and manual dexterity sufficient to operate a computer
- Requires normal range of hearing and manual dexterity sufficient to operate a cash register, computer, and telephone
- May require lifting up to 50 pounds occasionally

Work Environment:

- Moderate noise level similar to a typical busy office and warehouse environment
- Occasional exposure to loud trim machines (ear protection provided and available)
- Varied hours and/or days, including nights, days, holidays, or weekends
- Constant co-worker interactions

Administrative Assistant

Summary:

Implement activities related to the production of marijuana as directed by Production Facility managers. Coordinates and organizes all phases and duties of cultivation and processing.

Essential Duties and Responsibilities:

- Abide by all policies and procedures set forth by production managers
- Attend and preside over meetings
- Maintain production records
- Be responsible for implementing actions to achieve production goals
- Develop schedules and ensure they are adhered by the Cultivation and Processing department staff
- Participate in developing specific policies and procedures
- Coordinate and anticipate the needs and actions of the Cultivation and Processing department in order to ensure a successful workflow
- Ensure the production department inventory is stocked with high-quality products, which are regularly replenished to guarantee uninterrupted flow of necessary goods required for operations

Supervisory Responsibilities:

- No direct reports.

Knowledge, Skills and Abilities Required:

- One to two years related experience and/or training or equivalent combination of education and experience
- Bachelor's degree from an accredited college is preferred
- Must comply with state regulations and guidelines

Physical Requirements:

- Standing and moving for 2-3 hours at a time
- Long periods of prolonged sitting and standing
- Requires normal range of hearing

Work Environment:

- Moderate noise level similar to a typical busy office and warehouse environment
- Varied hours and/or days, including nights, days, holidays, or weekends
- Constant co-worker interactions

Restricting Access to those aged 21 and up

The Company understands the absolute necessity that access be restricted to those aged twenty-one (21) and up. Policies which prevent unauthorized access are found across many of the company's standalone policies and procedures documents. The following excerpts highlight sections of more comprehensive plans which will ensure that no individuals ages twenty-one (21) or younger will enter the facility or its premises.

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Personnel

Human Resources Policies

The Company will only select the most qualified applicants while staffing its operations. Qualifications will vary depending on the job position, but individuals with applicable work experience will be given first priority. The Company will only hire individuals that are twenty-one (21) years of age or older and will not hire applicants that have been convicted of any felony or other criminal behavior that indicates poor moral character. All applicants for employment will be required to submit a list of professional references that will be checked by the HRD during the hiring process. Any prospective agent that has been dismissed by a past employer for theft or similar behavior will not be considered for employment with the Company.

Establishment Agent Policies

Eligibility: All agents will be registered with the CCC before they can work or volunteer for the Company. Company will not hire agents or engage volunteers that have a

criminal history or are under the age of 21. All agents and volunteers will submit to a thorough background check. Any volunteer or agent unwilling to participate in the background check process will be eliminated from the hiring process.

Records: Each agent's personal records will be stored both electronically and in paper form. Access to these records will be limited to authorized personnel only. Physical copies will be stored in the Record Storage Room. Electronic copies will be stored electronically on a password protected cloud-based server. Company is committed to maintaining a transparent and fully accountable set of related Agent records for internal and external audits, and for review by CCC at all times. All records of agent training and certifications will also be maintained by HRD in the agent's personnel file. Agent application materials including their resume, list of professional references, copy of Commission issued badge, proof of age (21+) as well as related Background Check materials will also be stored within the agent's personnel file.

Security Team Policies

General

The Security Staff is led by the CSO. The Security Staff's purpose is to ensure the security of the premises, the people on the premises, and the surrounding community. Security Staff members will be expected to maintain the facility's Visitor Logbook, oversee deliveries, open and close the facility, and ensure that the facility's operations are not unduly interrupted by unruly behavior or other disruptions.

Hiring

The CSO is responsible for interviewing, vetting, and hiring the Company's Security Staff. The Company will ideally hire Security Staff members with prior military, police, or private security experience and will give special consideration to military veterans during the hiring process. The Company will not hire any individual that has been convicted of a crime that may cast doubt on that agent's moral character. All applicants will be required to submit a list of professional references that will be checked by the HRD during the hiring process. The Company will hire full-time Security Staff members to be on the premises during business hours.

Training

The Company's CSO will be responsible for designing and implementing a security training program for all of the Company's Security Staff. All Security Staff will be required to complete the security training program prior to beginning work at the Company. The training will include the Security Staff's role and responsibilities, the basic layout and function of the security system, and procedures to follow in the event of

a security-related incident. Furthermore, all Security Staff members will be required to undergo annual, continuing security training as part of the Company's commitment to continuing agent training and education. The emphasis of all security training activities will be focused on implementing preventative security measures as well as agent, consumer, visitor, and community safety.

Limited Access Areas and Perimeter Security

General Security Policy

The Company will meet or exceed all CCC requirements regarding facility security, product security, security equipment, and shipping and transportation security measures at its licensed premises, including requisite diversion prevention protocols. The Company will utilize a combination of security equipment and procedures, agent training, strict policies for customer and visitor verification, and controlling access to the premises to ensure that the Company's premises are secure at all times. The CSO is responsible for ensuring that the facility and agents remain in compliance with the Company's policies and procedures that those policies and procedures conform to best practices for marijuana facility security.

The Company will implement general security protocols in order to maintain a safe environment and deter and prevent unauthorized entrance into areas containing marijuana and the theft of marijuana at the licensed premises, including:

- Establish Limited Access Areas that may only be accessed by authorized agents, service professionals, security personnel, CCC representatives, local law enforcement, and authorized visitors, including: The Vault, the Security Office, the Packaging and Labeling Room, and the Records Storage Room; *935 CMR 500.110 (1)(g)*; *935 CMR 500.110 (4)(c)*; *935 CMR 500.110 (1)(e)*
- These Limited Access Areas will be identified by the posting of a sign that shall be a minimum of 12" x 12" and which states: "Do Not Enter—Limited Access Area—Access Limited to Authorized Personnel Only" in lettering no smaller than one inch in height. *935 CMR 500.110 (4)(a)*
- Store all finished marijuana and marijuana derivatives in the Vault when not in use in operations;
- Keep all safes, vaults, and areas used for the storage of marijuana, marijuana products, or facility supplies securely locked and protected from entry, except for the actual time required to remove or replace marijuana, marijuana product, or supplies; *935 CMR 500.110 (1)(g)*

- Keep all locks and security equipment in good working order; *935 CMR 500.110 (1)(h)*
- Prohibit keys or keycards from being left unattended or placed in any location accessible to persons other than authorized personnel; *935 CMR 500.110 (1)(i)*
- Limit access to the Limited Access Areas to only authorized personnel by utilizing combination numbers, passwords, or electronic or biometric security systems; and *935 CMR 500.110 (1)(j)*
- Ensure that the facility's perimeter, building exterior, and inside of the licensed premises is well-lit and covered by surveillance cameras to facilitate surveillance and deter break-ins.

These limited access areas shall be clearly described by the filing of a diagram of the registered premises, in the form and manner determined by the Commission, reflecting entrances and exits, walls, partitions, vegetation, flowering, processing, production, storage, and disposal areas. *935 CMR 500.110 (4)(b)*

The Company will also employ a number of procedural security measures to protect the physical premises, including:

- All individuals, regardless of employment or third party status, entering the facility must first present a valid form of government or agent identification. Access to the facility will only be granted if the individual qualifies under CCC regulations and the Company's internal security requirements.
- All visitors must sign in to the Visitor Logbook to receive a visitor badge, must wear the badge and be escorted at all times while on the facility premises, and must return the badge and sign out on the Visitor Logbook before leaving the facility;
- Individuals may not remain on the premises if they are not engaging in activities permitted by CCC regulations, such as a third-party company representative making a repair. Furthermore, individuals will not be permitted to loiter outside of the premises.
- During hours of operation, the facility will keep all marijuana and marijuana products in its established Limited Access Areas, and will not permit unauthorized individuals to enter these areas. Furthermore, only the minimum number of facility agents essential for efficient operation will be permitted in any Limited Access Area at one time.
- When the facility is closed, all marijuana and marijuana products will be stored in the locked Vault to prevent diversion, theft, or loss. *935 CMR 500.110 (1)(f)* Currency will be stored in the Cash Safe located within the Security Office. The Vault and Security Office are only accessible to high-level agents and members of Management and will be kept securely locked and protected from unauthorized entry. *935 CMR 500.110 (1)(g)* *935 CMR 500.110 (1)(g)*

- The facility will keep an electronic log of agents who have been authorized to access the Vault and know the combination to the Cash Safe. This log will also record the time and date on which an authorized individual accessed the Vault, the Security Office, or the safes within. *935 CMR 500.110 (1)(g)*
- All facility locks and security equipment will be inspected monthly and biannually and kept in good working order. Furthermore, the facility's security equipment, including surveillance cameras and alarm contact points, will be operational at all times.
- Facility agents authorized to possess keys to the facility's entrances will not be permitted to leave the keys in locks or in a location that is easily accessible to unauthorized individuals. Agents with knowledge of passwords, pass codes, and combinations will not be permitted to write down these pass codes and leave them in a location that is easily accessible to unauthorized parties. *935 CMR 500.110 (1)(d) 935 CMR 500.110 (1)(i) 935 CMR 500.110 (1)(j)*
- The Company will remain flexible in its security endeavors and work closely with the CCC to ensure the security of the facility. As such, the Company will develop sufficient additional safeguards in response to any special or changing security concerns that may arise as operations move forward and also in response to requested or required changes by the CCC.

Zero Tolerance Policy

Any person who engages in criminal, violent, or disruptive behavior on the Company's property or who uses any electronic means to threaten any agent or authorized visitor will be removed from the premises as quickly and safely as possible. The Company will involve law enforcement as necessary, and the CSO will lead the Company's subsequent investigation into the matter. The CEO, with the advice of the CSO, will decide how to proceed based on the findings of the investigation. This response may include but is not limited to (depending on who the violator is): a ban from the facility's premises; suspension or termination of any business relationship; reassignment of job duties; suspension or termination of employment; and the pursuit of criminal prosecution of the person or persons involved.

The Zero Tolerance Policy applies, but is not limited, to the following behaviors and situations:

- Violent or threatening physical contact (including fights, pushing, and physical intimidation);
- Direct or indirect threats;
- Threatening, abusive, or harassing phone calls, emails, or other communications;
- Possession of a firearm or weapon on the facility premises;
- Intentional destruction or theft of company property;
- Any criminal activity on the facility premises;

- Destructive or sabotaging actions against agents' or other individuals' personal property;
- Stalking;
- Violation of a restraining order; and
- Threatening acts or abusive language that leads to tension within the work environment.

Facility Access Control Policies

- The Company's facility will not be open to the public. Access to the premises will be limited to the Company's owners, management, agents, consumers, caregivers, and authorized visitors. Authorized visitors to the facility include registered consumers and caregivers, CCC representatives, local and state law enforcement, outside vendors, maintenance and service professionals, delivery agents dropping off shipments, contractors, and other visitors who are on the premises for business purposes.
- All authorized visitors will be required to show their government issued photo identification prior to entering the premises, and visitors under the age of twenty-one (21) will not be granted access. The Company will alert all vendors and other entities of the Company's policy regarding minors and request that all representatives sent to the facility be over the age of twenty-one (21). *935 CMR 500.110 (1)(a)* At each of the entrances to the Company's facility there will be a posted sign reading "NO MINORS UNDER THE AGE OF 21 ARE PERMITTED ANYWHERE ON THIS PREMISES." These signs will be at least twelve (12) inches wide and twelve (12) inches long and will be composed of letters larger than one-half inch in height in high contrast to the background of the sign.

Visitor Identification Verification Policies

The Company's policy is to have every visitor present a valid photo identification every time they enter the facility in order to fully comply with Massachusetts law. The Reception Agent stationed at the Reception Desk will make initial contact with all visitors and will check the visitor's government issued photo identification to confirm the visitor's identity and age.

Authorized visitors may present any of the following forms of identification:

- US Passport;
- An in-state or out-of-state driver's license clearly depicting the visitor's face;
- An identification card issued under Massachusetts state law;

- A US military identification card issued by a state that bears a picture of the person, the name of the person, the person's date of birth and a physical description of the person; or
- Any other identification card issued by a state that bears a picture of the person, the name of the person, the person's date of birth and a physical description of the person.

All out-of-state forms of identification will be checked against the Company's copy of the Driver's License Guide which is maintained in the Reception Desk when not in use. The Reception Agent will verify that the information and the picture on the identification match the person presenting it, and will inspect the identification for signs of alteration or falsification. Agents will be trained to check the date of expiration present on the form of identification and will not permit any visitors to enter the premises with expired identification. If the visitor appears to be under the age of twenty-one (21), the facility agent will ask to see a second form of identification such as a military ID, passport, or credit/debit card to verify their age and identity.

A photocopy will be made of each form of identification presented by an authorized visitor. These photocopies will be dated and filed in the Company's Visitor Logbook, maintained at the front desk reception area. At the end of each month, the contents of the Visitor Logbook will be scanned and uploaded to the Company's digital filing system and the hard copies will be transferred to the Company's Record Storage Room.

Visitors who are unable to present valid, government-issued identification will not be permitted on the premises. *935 CMR 500.110 (4)(e)* In the event that a visitor presents a form of identification that is suspected to be false, the facility agent will report the incident to their supervisor, the CSO, or the COO to further evaluate the identification in question.

Quality Control and Testing

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Scope

This section describes the policies and procedures of J – B.A.M., Inc. (“J-BAM” or the “Company”) with respect to its Quality Control and Testing.

Quality Control

Good manufacturing practices require that the Company establish written procedures for all aspects of handling materials and products, including receipt and cleaning, quarantine, sampling, storage, labeling, dispensing, processing, packaging, and distribution. Agents will be trained to follow these written procedures for all operational activities and to record these activities whenever required. The Company will record all deviations from the SOPs, and all deviations will be done in accordance with pre-approved procedures and must be approved in writing by the COO or the Quality Control Director.

Quality Control Director

Summary:

Responsible for oversight of all quality testing procedures. Accountable for the development, implementation and ongoing monitoring of the quality assurance and control systems in strict compliance with state regulations. Gives final approval for each batch to be released for sale to consumers. Responsible for root cause investigations relating to deviations from Standard Operating Procedures or batches that fail testing requirements.

Essential Duties and Responsibilities:

-

Physical Requirements:

- Standing and moving for 2-3 hours at a time; sitting for prolonged periods, some bending;
- Hand-eye coordination and manual dexterity sufficient to operate a computer
- Requires normal range of hearing and manual dexterity sufficient to operate a cash register, computer, and telephone
- May require lifting up to 50 pounds occasionally

Work Environment:

- Moderate noise level similar to a typical busy office and warehouse environment
- Occasional exposure to loud trim machines (ear protection provided and available)
- Varied hours and/or days, including nights, days, holidays, or weekends
- Constant consumer and/or co-worker interactions

Quality Control Responsibilities

The Quality Control Director of the company will ensure that there is a Quality Management System in place. He/she will ensure that communication is done to all levels of the company regarding the importance of meeting quality requirements. He/she will do periodic reviews of the quality system to be sure it remains up to date and fit for purpose.

1. Overview

Quality Management System:	A collection of business processes focused on coordinating and consistently meeting customer, regulatory, legal and other best practice requirements and enhancing their satisfaction. It is aligned with COMPANY's purpose, business goals and strategic direction. a formalized system that documents processes, procedures, and responsibilities for achieving quality policies and objectives. A QMS assists in improving COMPANY's effectiveness and efficiency on a continuous basis.
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QMS Principles:	<ol style="list-style-type: none"> 1. Customer (internal & external) focus 2. Strong leadership 3. Involvement of people 4. Process approach
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5. System approach
6. Continuous improvement
7. Decision making based on facts
8. Creating value for the company, its clients and its suppliers

QMS Management Duties and Responsibilities

- Management commitment
- Customer focus
- Quality policy
- Strategic planning
- Responsibility & authority
- Communication

QMS Resource Management Trainings

- Resource provision & needs
- Personnel assignment
- Competency & training
- Ethics
- Confidentiality
- Facilities & work environment
- Equipment
- Purchase of supplies & services
- Support services

QMS Components:

The implementation of a quality policy, creating and implementing quality planning and assurance, and quality control and quality improvement.

- Quality Manual which includes
 - Scope, requirements/regulations & SOPs
- Documentation
 - SOPs, work records & products, reports, employee records (training, job descriptions etc.), audits, CAPAs, deviations, management review etc.

- Clearly defined approval authority
- Availability to applicable personnel

Standard
Operating
Procedure
(SOP):

A set of step-by-step instructions compiled by an organization to help workers carry out complex routine operations. SOPs aim to achieve efficiency, quality output and uniformity of performance, while reducing miscommunication and failure to comply with appropriate regulations and best practices.

Work Process Duties

- Planning work processes
- Work plans & assignments
- Control of equipment & materials
- Operations
- Work & method controls
- Verification & validation of work processes
- Integrity, traceability & identification
- Reporting Results
- Policy Audits
- Corrective actions
- Preventive actions
- Continual improvement

Key
Performance
Indicators:

A measurable value that demonstrates how effectively a company is achieving defined processes, objectives, goals etc.

Quality
Assurance:

The part of quality management focused on providing confidence that quality requirements will be fulfilled. It relates primarily to how a process is performed. It may be done during the performance of the process.

Quality Control:

The part of quality management focused on fulfilling quality requirements. It relates primarily to the inspection aspect of quality management. It may be performed after the process has taken place.

Quality Control Overview

- a. The COO will appoint a responsible person to head the quality function and provide resources as required to be fit for purpose, or the COO will be responsible for the functions of the quality control director until one is appointed.
- b. The head of quality will ensure that the following are put into place:
 - i. **SOPs** and other written procedural documents to ensure that all processes are described, trained and carried out in compliance with the procedures. The SOPs and procedural documents will be periodically reviewed to determine if they are up to date or in need of change or revision.
 - ii. **Key performance indicators** including but not limited to those in real time and those after the process or step has taken place.
 - iii. **Training.** The quality head will ensure that all personnel are trained on the appropriate SOPs and processes before any work is done. He/she will ensure that adequate training records are kept for all personnel.
 - iv. **Compliance.** The quality head will ensure that a root cause analysis is done for each failure in process or function.
 - v. **CAPAs.** The quality head will ensure that corrective action/preventive action plans (CAPAs) are created, implemented and completed for all compliance issues, deviations, failures of process etc.
 - vi. **Audits.** The quality head will ensure that a program is put in place and implemented for periodic internal and external audits of departments and functions both internally and externally (e.g. outsourced functions, partners etc.). He/she will also ensure that audits of COMPANY are prepared for and handled in accordance with the SOP on company audits and inspections.
 - vii. **Safety Documents.** The quality head will ensure that the appropriate contracts and safety data exchange agreements are in place with third parties and any others involved in safety matters such that COMPANY remains in compliance with all regulations, requirements etc.
 - viii. **Computer Validation.** The quality head will ensure that all computer systems used for safety (whether internal or external) are fit for purpose, validated and in compliance with all applicable legal and regulatory requirements.
 - ix. **Personnel.** The quality head will ensure that all job descriptions, CVs, training records and organization charts are in place and up to date.
 - x. **Document Control.** The quality head will ensure that all appropriate documents are handled in a controlled, versioned manner and are available to users.

Waivers

The provisions of this document may not be waived except by written agreement of the CEO and COO.

Quality Control Policy

The Company will adopt a process approach to developing, implementing, and improving the effectiveness of the quality control system to increase consumer satisfaction. The International Standards Organization (ISO) recommends the implementation of a process approach to increase the quality of products and services provided for all businesses that need to demonstrate their ability to consistently provide products that meet customer and applicable statutory and regulatory requirements. The process approach refers to the identification of processes within the business and the structuring of how these processes interact to produce a desired outcome. By properly identifying which processes are required to achieve its quality control goals, Management will be able to provide its consumers with superior service and care. The Company's goal in implementing a process approach to quality control is to attract a disproportionate number of Delaware's medical cannabis consumers through the provision of high-quality medical cannabis products and superlative consumer service.

The Company will apply the Plan-Do-Check-Act (PDCA) methodology to all identified business processes. This approach is best described as follows:

1. Plan – The planning process allows Management to establish the objectives and processes required to achieve its quality control goals.
2. Do – Implementing the processes allows them to be tested in the business environment.
3. Check – Management will monitor and measure the processes against the Company's quality control goals and compile a report detailing the results.
4. Act – Management will then act on the information reported to continually improve performance.

By identifying, implementing, and continually improving its business processes, the Company intends to provide the highest quality product in the State of Massachusetts. Management and all agents will be required to complete annual training on the Company's quality control system and quality of products and service will be a priority for all operations. By implementing and maintaining the quality control system envisioned by Management, the Company will serve as a model of efficiency, effectiveness, and consistency of service for dispensaries across the nation.

Management is responsible for determining which documents, forms, and records are required to implement the quality control system in the dispensary's daily operations. A drafting committee will be assigned to compile initial drafts of all required documents,

forms, and records, which must be approved by the Director of Quality Control (DQC) prior to being used in operations. The DQC is responsible for reviewing and updating all quality control related documents, including the Manual and procedures, and for ensuring that all dispensary agents and Management are informed of and have access to the most recent versions of these documents. Copies of these documents will be retained on-site and all agents will have access to them during working hours. Management will develop a record keeping system which establishes procedures and controls required for the identification, storage, protection, retrieval, retention, and disposition of all business records. The record keeping system will be designed to enhance efficiency and minimize time and effort spent on record related issues. Outdated or obsolete documents will be retained on the dispensary's secure, cloud-based server and physical copies will be cross-shredded or marked appropriately and stored separately from current versions of the quality control documents.

Product Testing

The Company will contract with a licensed third-party testing laboratory to accurately test marijuana produced at the Company's cultivation facility, as described below.

Product Packaging and Labelling

Wholesale Bulk Sales and Distribution Practices only

The company will not engage in any retail or consumer sale. The company will only sell marijuana product to licensed marijuana establishments. The following described the company's policies for packaging and labelling of its wholesale bulk product.

Introduction: One of the Company's highest priorities is ensuring that all marijuana products sold undergo a fully comprehensive Packaging and Labeling Plan. The purpose of the following Plan is to ensure consistency in packaging and labeling of marijuana products in order to prevent the purchaser with correct, identifiable information regarding the purchased product.

All of the Company's packaging activities will take place at the production facility. The company does not intend to sell products to any consumer or for consumer purchase; as such the labeling will not reflect the requirements of point of sale labeling.

Packaging Selection: In accordance with CCC rules and industry standards, all Company marijuana products will be packaged in plain, opaque, and child resistant containers. 935 CMR 500.105(6)(a)(1)(a). The company's products are sold wholesale

and for distribution of only bulk marijuana flower product. As such, the company understands that it is not explicitly required to meet the tamper child-resistant packaging of 935 CMR 500.105(6)(a), though as a part of the company's own operational policy it will package its product in tamper and child-resistant containers for transport to other marijuana establishments. The Company will select packaging that has undergone extensive child-resistant testing that meets the standards of US federal regulation 16 C.F.R. 1700.20—Poison Prevention Packaging Act—Testing Procedure for Special Packaging. 935 CMR 500.105(6)(a)(1)(d). These federal standards include rigorous prescribed testing of child resistance that meet American Society for Testing and Materials (ASTM) guidelines.

Training: All the Company agents will be trained on the proper use of the packaging containers used for marijuana products at the facility. The Company's training materials will be compiled by Management from the extensive information on product manufacturing websites and from in-person Company testing. Training will include information about the proper storage of containers, and the procedure for securely attaching required labels to the containers.

Long-Term Storage and Transport Packaging: The Company will store all wholesale and bulk inventory at the facility in one-pound Grower Transport & Storage Bags. The Grower Transport & Storage Bags are food grade, airtight and smell proof, tamper resistant, and features a resealable zipper and a heavy-duty design. 935 CMR 500.105(6)(a)(1)(c). Additionally, the Grower Transport & Storage Bags feature a writable exterior that will allow the Company to easily mark strain information and track inventory.

Packaging Policies: The Company will not package marijuana or marijuana products in a container not described in this Plan. The Company will never sell or give away any container except with the purchase of marijuana product to a registered marijuana establishment. Certified marijuana containers are meant to keep the product away from children and are not souvenirs.

Labeling

Introduction: Ensuring the safety of consumers and the community is of utmost concern for the Company because the Company is aware of the dangers that marijuana may pose to consumers. An obvious way to mitigate foreseeable harm is to ensure that all products manufactured and sold by the Company include proper labeling. The labeling used by the company is not meant for point of sale. The company will only sell product in 1 lb. bulk packages to licensed marijuana establishments, who will then have

to repackage the product and comply with point of sale labeling requirements. The company intends it to be the responsibility of the purchasing marijuana establishment to re-package and re-label the product for point of sale dispensing. The following requirements do comply with 935 CMR 500.105(5)(a), though this compliance is intended for the company's personal operational efficacy and to provide clients with the necessary information directly on the product. The company will not be creating any retail brand or engaging in commercial marketing practices, as such the label's informational content and design will reflect, not consumer purchasing, but establishment to establishment purchasing. The company intends to rely on 935 CMR 500.105(5)(a)(10), and place the responsibility of any relevant labeling requirements for sale to consumers in the Licensed Processing or Retailing establishment. 935 CMR 500.105(5)(a)(10). The purpose of the following Labeling Plan is to ensure that every product sold by the Company features a proper informative label that provides information to clients, though happens to be in full compliance with the requirements of 935 CMR 500.105(5)(a), in order to ease the task of re-labeling for our clients.

Marketing, Branding, and Advertisement:

The company will not engage in any advertising, marketing or substantial branding. The company is currently in talks with potential buyers, and intends to only market itself through direct channels of communication to clients. 935 CMR 500.105(4)(a). There will be no advertising or marketing practices outside the limited direct communications to clients and potential clientele. The extent of the company's brand will be the inclusion of its business name on the label. The company will have no other marketing, advertising, or branding practices, which have not been stated in this section.

Labeling Substance and Compliance: The company will only sell marijuana flower and label in concert with the requirements for marijuana not sold as product; thus, the provisions for labeling of edible products, concentrates and extracts, and infused tinctures and topicals do not apply. 935 CMR 500.105(5). The CCC has set forth requirements to which the Company is fully committed to following, though to make task of re-labeling easier for our clients and not to inherit the responsibility for consumer-side labeling.

The following warning messages will be included on all Company package labels in letter font no smaller than one-sixteenth of an inch high:

- The name and registration number of the Marijuana Cultivator that produced the Marijuana, together with the retail Licensee's business telephone number,

electronic mail address, and website information, if any; 935 CMR 500.105(5)(a)(1)

- The quantity of Usable Marijuana contained within the package; 935 CMR 500.105(5)(a)(2)
- The date that the Marijuana Retailer or Marijuana Cultivator packaged the contents and a statement of which Licensee performed the packaging; 935 CMR 500.105(5)(a)(3)
- A batch number, sequential serial number, and bar code when used, to identify the batch associated with manufacturing and Processing;
- 935 CMR 500.105(5)(a)(4)
- The full Cannabinoid Profile of the Marijuana contained within the package, including THC and other Cannabinoid level;
- 935 CMR 500.105(5)(a)(5)
- A statement and a seal certifying that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15; 935 CMR 500.105(5)(a)(6)
- This statement, including capital; 935 CMR 500.105(5)(a)(7)
- The following symbol or easily recognizable mark issued by the Commission that indicates the package contains Marijuana Product; 935 CMR 500.105(5)(a)(8)



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- The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children: 935 CMR 500.105(5)(a)(9)



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METRC Label Integration: The Company will use the METRC inventory tracking system to label all products packaged and sold. The METRC system will allow the Company to print unique labels for all marijuana products. After each label is printed, the agent packaging the product will double check the information on the label to guarantee no mistakes or misprints were made.

Labeling Procedure: The following are the procedures that all registered agents will follow when labeling a marijuana package:

- Select the strain or product name on the METRC interface that was previously packaged.
- Print out the corresponding package label from the METRC system label printer.
- Check the printed label to ensure the accuracy of the strain or package name, amount of marijuana or marijuana product sold by weight; finished product lot number; the Company's name, address, and state license number; the expiration date; and the date of packaging.
- Ensure that the printed label also contains the State-required warning messages.
- If the information on the printed label is correct, secure the label to the marijuana package using the label's peel-off adhesive. If the label is incorrect, void out the incorrect label and reprint a correct label.

Pre-Approval of Packaging and Labeling:

Prior to any marijuana product being sold the company apply, in a form and manner determined by the commission, for packaging and label approval to the commission. 935 CMR 500.105(7). Only once the packaging and labelling has been approved by the commission, will the company sell its product wholesale to its clients. The company understands that pre-approval does not replace the packaging and labelling requirements provided in 935 CMR 500.105(4) through (6).

Quality Control in Cultivation Practices

Maintenance of Environment, Water Quality & Nutrients

Cultivation Environment

One of the chief advantages of indoor hydroponic cultivation is the ability to precisely control the cultivation environment. Marijuana plants thrive under certain conditions and segmenting the cultivation areas into smaller rooms allows the cultivation facility to efficiently control the ambient

conditions in the cultivation areas. Three important aspects of the cultivation environment are temperature, humidity, and CO2 levels. The cultivation facility has been designed to provide complete control over these three aspects of the cultivation environment which will increase the facility's production capabilities. The company understands the importance of worker safety, and the importance of tailoring safety protocols that address all aspects of the facility operations. 935 CMR 500.120(11)(d). The Company will use an automated cultivation control system to maintain stable cultivation environments in each individual production area. This system will monitor and control the temperature, humidity, and CO2 levels in each cultivation room according to the desired specifications for each room.

Temperature

By controlling the temperature in the cultivation areas, the cultivation facility will be able to promote healthy plant growth and increase overall production. Marijuana grows best between 80 and 85 degrees Fahrenheit. Ambient temperatures outside this range will slow plant growth and reduce the yield of the plants in the cultivation environment. The cultivation facility will install commercial air conditioning units which will allow the cultivation staff to preset and regulate air temperature. The air conditioning units will also be capable of controlling CO2 and humidity levels and can incorporate air filters and purifiers to reduce the odors emanating from the cultivation facility.

Humidity

Controlling the humidity in the cultivation areas is critical to promoting plant growth. Marijuana grows best in an environment with a relative humidity of 40-55%. The cultivation facility will install dehumidifiers in each cultivation and post harvest area. These dehumidifiers will be connected to humidity measuring devices and will be programmed to automatically turn on whenever a room becomes too humid. Clones require more humidity than more mature plants and do best in an environment with 75-85% relative humidity. Therefore, the cultivation facility will utilize humidity domes to efficiently maintain these higher humidity levels in a contained area within the mother clone room.

CO2

CO2 is a critical element of photosynthesis for all plants. Without the right CO2 levels, plant growth can quickly slow and the plants can die without access to fresh air. Photosynthesis is interrupted in marijuana plants when CO2 levels drop below 200 ppm. The cultivation facility will utilize automated timers and CO2 measuring devices to maintain CO2 levels in each room. Each cultivation room will be properly ventilated, and additional CO2 will be automatically pumped into the cultivation rooms when levels dip below optimal. Fans will be placed throughout each cultivation room to induce airflow around the plant canopy and the root area. Adding additional CO2 to the cultivation environment allows plants to withstand and thrive under higher temperatures, which reduces the amount of energy the cultivation facility must use to

cool the space. The cultivation facility will maintain CO2 levels within the flowering cultivation areas between 1,200 and 1,500 ppm to promote healthy, vigorous plant growth.

CO2 Safety

CO2 is an asphyxiate gas and at high concentrations it is potentially harmful for humans. To promote worker safety, the cultivation facility will install high limit alarms to notify staff when concentration levels are too high to safely work and the environmental control system will be programmed to shut off any additional CO2 injections if levels are approaching dangerous levels. All areas where CO2 tanks are stored and where CO2 is directly injected will be labeled with clear signage to inform both staff and authorized visitors. Cultivation staff will adhere to the National Fire Protection Association Codes at all times when using CO2.

Water Quality

The cultivation facility will take great care to ensure the quality of the water it uses to feed and water the plants. The nutrients used in the feeding process will be dissolved in the water to increase the alkalinity, or buffering ability, of the solution. Marijuana prefers water with a pH between 5.8 and 6.3 and staff will use pH adjusters, chemicals that change the pH of a solution, to bring the water within the desired range if necessary. Cultivation staff will check the water and nutrient solutions using PPM and pH meters prior to using it in cultivation operations and the reservoir will be tested throughout the day to ensure appropriate levels. Using water with a consistent pH and dissolved mineral content will increase the consistency of the cultivation facility's production and ensures that the cultivation facility has complete control over the quality of the water used in operations.

Nutrients

The cultivation facility will utilize commercial nutrient lines. Commercial marijuana nutrient lines are typically comprised of nitrogen (N), phosphorous (P), and Potassium (K). Marijuana uses a large amount of N during the vegetative phase and vegetative nutrient mixes are generally high in nitrogen. Phosphorus and potassium are critical to the flowering process and so flowering mixes are usually high in P and K. The cultivation facility will deliver nutrients to the plants via a drip irrigation system. The nutrients will be added to the reservoir tank in the appropriate ratios for the plants' growth phase and pumped to the plants in predetermined quantities through the drip irrigation system. Nutrient levels are typically measured in parts per million (ppm), and can be determined using a handheld PPM/EC reader. The amount of nutrients and the number of feedings will be increased as the plants mature and the ratio of nutrients will be adjusted to feature additional phosphorus and potassium as they enter the flowering phase.

The vast majority of nutritional deficiencies can be easily identified by a simple visual inspection of the plant. Various deficiencies manifest themselves in different ways and many of these symptoms have been identified and documented in various marijuana cultivation manuals. The cultivation staff will use various marijuana cultivation resources and its collective expertise in plant sciences and biology to diagnose any issues. Many nutrient deficiencies are caused by nutrient lock out due to an imbalance in the pH of dissolved nutrients in solution. When the symptoms of a nutrient deficiency are detected, the cultivation staff will check the pH and alkalinity of the water and grow media first to determine if this is the source of the deficiency.

Over Fertilization

Over fertilization often manifests itself through many of the nutrient-specific symptoms. The excess nutrients take up space in the plant's cells and can work to change the plant's chemistry in negative ways. To avoid over-fertilization, cultivation staff will:

- Monitor Electrical Conductivity (EC);
- Monitor pH of media and solution;
- Check the temperature of the media and the nutrient solution; and
- Follow all other recommended cultural practices.
- Monitor moisture levels of the grow media

Maintaining Fertility within the Guidelines

Maintaining the pH, alkalinity, and nutrient levels in the water that is fed to the plants is just as important as maintaining the temperature, humidity, and CO₂ levels of the ambient cultivation environment. The cultivation staff will carefully add pH adjusters and nutrients until the solution reaches the optimal levels for marijuana plant growth. To ensure that these optimal levels are maintained, staff will test the water as well as the grow media for electrical conductivity, a measure of alkalinity, and pH using handheld testing devices such as PPM/EC readers, pH readers, and Hanna probes. Optimal nutrient concentration levels in the root zone are typically between 800-1200 ppm while the optimal pH for plant growth is between 5.8 and 6.3.

If the correct nutrient levels are maintained, the grow media and the water and nutrient solution will test at the same, or very similar, levels. High nutrient levels in the media as compared to the nutrient solution, is a sign of over-fertilization while higher nutrient levels in the reservoir is a sign of lower than optimal nutrient levels in the solution. Agents will be trained to adjust the nutrient levels in the reservoir to reach the optimal levels for plant growth. All testing devices will be calibrated according to the manufacturer's recommendations once each week to ensure accurate readings.

After testing the grow media, Staff will record values for pH and EC for several plants in different areas of the cultivation room (approximately 6–10 plants), and will adjust pH and nutrient levels as needed.

Cultivation Sanitation and IPM

Purpose

Maintaining a clean facility is an important preventative practice that can reduce the numbers of pests and pathogens to infest a crop.

Responsibility, Personnel, & Facility Operations

The cultivation facility and all fixtures and equipment will be maintained in a sanitary condition and subject to routine cleaning and sanitization to reduce the potential for contamination. All garbage and waste will be stored in waste containers and removed from the facility on a daily basis in order to prevent pests from breeding in the facility's trash. Cultivation staff will be assigned to sweep, mop, remove waste, and clean and sterilize work areas and equipment as part of their daily tasks and the Grow Team Leader will ensure that all cleaning tasks are carried out promptly.

Facility Design

The facility has been designed to eliminate any entrances or potential nesting or breeding areas for outside pests. All rooms, hallways, and work areas are designed to be easily cleaned and maintained and the facility will be well lit throughout to facilitate the easy identification of potential pest problems. 935 CMR 500.120(9). The cultivation facility will utilize cleaners, sanitizers, and sterilizers as necessary to protect all work stations and contact surfaces from contamination. These chemicals will be stored separately from nutrients and other chemicals used in the cultivation process, and any potentially toxic cleaning compounds will be segregated from the other cleaning compounds and stored in a manner that prevents the contamination of marijuana. Material safety data sheets will be readily available in a dedicated binder for reference at all times and employees will be trained accordingly as to the use and safety of all chemicals and cleaning materials on the premises.

Staff Hygiene

Cultivation staff will be required to maintain good personal hygiene practices and will be issued uniforms as well as protective coverings such as gloves and hairnets to reduce the potential for staff initiated cross-contamination. The facility has been designed with multiple properly equipped hand washing sinks with sanitizing agents and drying surfaces to provide cultivation staff with convenient access to hand washing facilities. Cultivation staff will be required to wash their hands after using the restroom, between tasks, after eating or drinking, or any other potentially contaminating situation. Staff members who are sick, have open wounds or sores, or could otherwise potentially contaminate the facility will be excluded from operations unless the

wound or sore can be adequately covered. The cultivation facility will be equipped with ADA-compliant restrooms which will be maintained in good repair and consistently stocked with the required products.

Staff Sanitation Tasks

Cultivation staff will be assigned cleaning and sanitation tasks on a daily basis to ensure that the entire facility is consistently clean. Most cleaning routine activities will take place towards the end of the day as a part of the cultivation staff's closing duties. The facility's floors will be swept and surfaces dusted each night prior to closing the cultivation facility. Task related cleaning, such as sanitizing equipment and cleaning pots, will be done before and/or after the task as required by the task specific policies and procedures. All cultivation, harvesting, and post-harvesting equipment will be cleaned and sanitized before and after each use to prevent any cross-contamination between batches. Each time a batch of plants is transferred from a room, the cultivation staff will thoroughly clean the room and sanitize the walls and fixtures with a 10% bleach/water solution. The plant benches will be cleaned and sanitized once the plants have been removed from them and prior to any reuse. Once each month, the entire cultivation facility will undergo a sanitation inspection and deep clean in which all areas and equipment, including the HVAC system, not currently in use for cultivation will be cleaned and sanitized by the cultivation staff as a precaution to avoid contamination. These preventative measures will ensure that contaminants, pests, and pathogens have little opportunity to infest the premises and spread to the cultivation areas.

Waste Disposal

General facility operations waste will be deposited into exterior receptacles nightly, to prevent rot or contamination to any marijuana product. Exterior waste receptacles will be located on the Establishment's premises and interior to the fence boundary. The receptacle must be capable of locking. This waste will not include any marijuana or marijuana by-product and comply with all applicable state and local statutes, ordinances, and regulations. 935 CMR 500.105(12)(a).

Since the irrigation system is designed to produce no leachate there will be little to no waste water generated. The facility will not use any pesticides in its fertigation system, thus no wastewater will have pesticides. Waste water, if any, will be collected by the cultivation facility's drain to waste drip irrigation system and disposed of in compliance with all applicable state and federal requirements, (Massachusetts Clean Waters Act, M.G.L. c. 21 §§ 26 through 53; 314 CMR 3.00: Surface Water Discharge Permit Program; 314 CMR 5.00: Groundwater Discharge Program; 314 CMR 12.00: Operation Maintenance and Pretreatment Standards for Wastewater Treatment Works and Indirect Dischargers; the Federal Clean Water Act, 33 U.S.C. 1251 et seq., the National Pollutant Discharge Elimination System Permit Regulations at 40 CFR Part 122, 314 CMR 7.00: Sewer System Extension and Connection Permit Program). 935 CMR 500.105(12)(b).

Processing and destruction of the plant waste will be done on the same day as the harvest so that the grow media used in the cultivation process can be used to mix with the plant material after destruction to render it unusable. Plant waste will be stored in a storage container marked "Plant Waste Only." Staff will mix the marijuana/media with appropriate food waste or saw dust

and ensure that the resulting mix is always be more than 50% non-marijuana waste. The plant waste will then be shredded using a motorized shredder and mixed with an equal weight of non-marijuana waste (i.e. grow media). This unusable mixed marijuana waste will then be transported to the appropriate and permit-holding incinerator/disposal center in the area. Staff will weigh all plant waste, physically record the weight, and then enter that weight into the inventory tracking system before mixing. 935 CMR 500.105(12)(c).

The Grow Team Leader will oversee the establishment agent in charge of all the waste mixing and disposal, ensuring two establishment agents witnessing and documenting disposal activities, as well as being monitored by surveillance cameras. The resulting mixture will be stored in a secure, locked receptacle until it is transported to an incinerator/disposal center. Plant waste destruction will be recorded and documented into an electronic record containing the following pertinent information:

- • Written or Electronic record of the date;
- • Type and quantity disposed or handled;
- • Manner of disposal or other handling;
- • Location of disposal or other handling;
- • Names of the two Marijuana Establishment Agents present during the disposal;
- • The signatures of the two establishment agents.

Records of all waste disposal events will be maintained for three (3) years in the Record Storage Room after the destruction of the plant waste, or indefinitely if pertaining to an enforcement action by the commission or law enforcement. 935 CMR 500.105(12)(d).

Integrated Pest Management

The primary benefit of contained cultivation is the ability to completely control every aspect of the cultivation environment. This control allows the cultivation staff to maintain optimal cultivation conditions and grow higher quality products in greater volumes than traditional agriculture. Cultivators have traditionally dealt with pests and pathogens using chemical controls such as pesticides, herbicides, and fungicides in cycles throughout the cultivation process. However, developments in IPM techniques in recent years have led to more and more cultivators implementing an Integrated Pest Management ("IPM") program to prevent pest infestations. 935 CMR 500.120(9).

IPM encompasses multiple approaches to pest management including: cultural practices such as scouting and surveillance; environmental controls; and corrective measures such as biological and mechanical controls. Taking a systematic approach and combining multiple pest control practices cultivation staff can consistently achieve greater and more economical control of pests over time than with chemical controls alone. IPM techniques, when properly implemented, are capable of achieving the same or better results with lower costs than pesticides.

The objective of the Company's IPM techniques is to achieve acceptable thresholds of pest and pathogen populations while at the same time eliminating the opportunities for resistance to pesticides, limiting potential outbreaks of new infestations, and increasing staff and consumer safety by promoting effective horticultural practices throughout the cultivation facility. IPM strategies benefit the environment and are better for the plants' overall health thanks to the lack of pesticides and other chemical controls during the cultivation process. The IPM techniques that will be implemented by the cultivation facility are designed to eliminate the use of chemical pesticides in the cultivation process, as such any regulations regarding pesticide use are not directly applicable to the company's practices. However, in the event that any testing indicates noncompliance with the relevant pesticide regulations, the Company will immediately report to the Commission of such matters. 935 CMR 500.120(5). The most useful IPM techniques in marijuana cultivation are scouting, pest identification, sanitation, environmental controls, biological controls, and recordkeeping and analysis. Used together, these techniques can prevent major infestations of pests and pathogens from overtaking large portions of the crop in the cultivation areas.

Cultural Practices

Surveillance and Preventative Measures

Scouting is the most basic and the most important of IPM techniques. Scouting involves a visual inspection of the crop and strategically placed pest traps to determine the health of the crop, the types of pests inhabiting the cultivation areas, the size of the population, and whether there are any identifiable trends in the pest populations. If agents are diligent in their scouting duties, they will be able to quickly identify pests when they first appear in the cultivation area and take corrective action before the infestation can get out of control and cause irreparable damage. Through scouting, cultivation staff can proactively identify, control, and prevent pest infestations before they become uncontrollable. 935 CMR 500.120(9).

Every morning, two cultivation staff members will be assigned to scout the cultivation area for signs of pests. Pest infestations are often hidden or invisible to the naked eye, but symptoms of the infestation will be apparent upon inspection. Different pests inhabit different areas of the plants and certain plant parts, like the undersides of leaves, can often play host to large pest populations. The Cultivation Director and Grow Team Leader will train agents to search the underside of pots and leaves and to monitor stems, flowers, and all other plant parts for signs of pests or other visible abnormalities. The cultivation staff will be trained to search for these parts of the plants and recognize the signs of potential infestation and to document and record all pest outbreaks, the population size, the date the infestation was first noticed, and the duration of the infestation on a Scouting Report Sheet. 935 CMR 500.120(9).

Certain areas of the cultivation facility will likely be more prone to infestation than others. These trouble spots will be identified and monitored more closely than other areas of the facility. The same can be said for different strains of marijuana. Some varieties of strains have better resistance to pests and pathogens than others and those strains with weaker immune systems will be monitored more closely than those strains who are stronger and better able to resist

pests. Once the cultivation facility has completed several harvests and the cultivation staff have grown all the strains a few times these problem areas and strains will be identified and corrective or preventive measures will be implemented to reduce the risk of infestation, outlined below throughout the Integrated Pest Management, ("IPM"), section. 935 CMR 500.120(9).

Scouting Procedures

Two members of the cultivation staff will be assigned to conduct a walk-through of the cultivation facility every morning to scout for signs of infestation or other crop abnormalities. By scouting on a consistent schedule, the cultivation staff will be able to identify and track pest problems as they develop. Common pests found in a marijuana cultivation facility typically do not distribute themselves uniformly throughout the cultivation areas. The cultivation staff will therefore need to inspect all of the cultivation areas on a consistent basis in order to quickly identify any infestations. 935 CMR 500.120(9).

Any plants with visible signs of infestation will be identified by a strip of neon orange ribbon visibly tied above the infested plant. These neon ties will allow the cultivation staff to view the scope of any infestation and monitor its spread throughout the cultivation area. Each plant will be inspected in the same manner to ensure that no pests go unnoticed. The cultivation staff will start their inspection at the grow media and work their way up the plant. Many pests like to live on the undersides of leaves so the older, lower-hanging leaves will be turned over and if necessary. The cultivation staff will inspect all the way up the plant to the apical shoots. If a pest is detected, the agent will flag it with an orange ribbon so it can be located again. The plants, cubes, benches, grow media, and other objects in the cultivation areas will all be thoroughly inspected while the cultivation staff is scouting. 935 CMR 500.120(9).

The cultivation staff will record their findings on a Scouting Report Sheet which will be turned in to the Lead Grower for review each day. Cultivation staff will take detailed notes regarding the type, amount, location, growth stage, and severity of all pest infestations while they are scouting. Detailed records of all biological controls or other measures taken to reduce the pest population will be maintained and used to determine future measures that will be applied in the face of pest infestation. The Scouting Reports will be analyzed to and measures will be taken to perfect the cultivation facility's IPM strategies and identify any trends in pest populations. These notes will provide valuable insight into the pest problems facing the cultivation facility and the effectiveness of control techniques being implemented. Once an infestation has been identified and treated, the cultivation staff will check back on that particular plant to ensure that the treatment was effective. Twice each week, the cultivation facility's Grow Team Leader will conduct an independent walk-through to check the quality of the cultivation staff's scouting efforts.

Insect Monitoring Cards

Insect monitoring cards, also known as sticky cards, are generally made of colored paper coated with a non-drying adhesive designed to trap insects. Sticky cards allow cultivators to visibly detect pest outbreaks and make better decisions regarding treatment of these infestations. By routinely monitoring and changing these cards, the cultivation staff will be able to make pest treatment decisions based on real-time pest population data. The cultivation

facility's sticky cards will alert cultivation staff if a localized infestation is starting to spread to other parts of the cultivation facility.

Sticky cards provide an excellent means of identifying which pests inhabit the cultivation area because different pests are attracted to different color cards. Blue sticky cards are designed to attract thrips, while yellow sticky cards attract a host of common pests, including whiteflies, fungus gnats, winged aphids, and other flying pests. Placing sticky cards at grow media level can help agents detect the presence of newly emerged thrips and fungus gnats so cultivation staff will place sticky cards at grow media level and above the canopy in order to maximize pest detection. Sticky cards will be dispersed throughout the cultivation facility and will be placed near all entryways and along traffic paths to detect any migration of pests throughout the cultivation facility. Strains and areas of the cultivation facility that are particularly susceptible to infestation will be equipped with extra sticky cards to increase the cultivation staff's ability to monitor pest populations.

Equipment Sanitation

All measuring probes, pruning tools, and other assorted cultivation equipment will be cleaned and sanitized immediately after being used on plants suspected of being infested. Diseases, pests, and pathogens are easily spread from one plant to another and cultivation equipment can provide a temporary home until the equipment is used on another plant. All equipment that comes into physical contact with the plants will be sanitized in an alcohol solution after use and prior to use on a different plant. Cultivation staff working with such tools will be provided with a small container of alcohol solution while working in order to periodically clean and sanitize the equipment. Tools and equipment that do not come directly into contact with the plants will be disinfected after use and prior to beginning work on a new batch of plants. Smaller equipment, such as pruning shears will be soaked in an alcohol solution overnight while larger pieces of equipment will be rubbed down with a clean rag and alcohol.

All hoses, drains, wands, pumps, and other water dispersion equipment used in the cultivation process will be regularly cleaned and sanitized. Floor drains, gutters, and troughs will be regularly bleached and all hoses, wands, and pumps will be treated with calcium hypochlorite or Zeritol at least once a month. Hose lines will be pressurized and left to soak overnight in an alcohol or Zeritol solution and hung out to dry after use. Drip irrigation lines will be soaked in an alcohol solution and all pumps and their component pieces will be soaked and cleaned in the same manner.

Cleaning and sanitizing the propagation area and propagation equipment is essential because young plants are particularly susceptible to pests and pathogens and could potentially infest large portions of the cultivation facility as they go through their life cycle. The cultivation facility will thoroughly clean and sanitize all razor blades, planting trays, and humidity domes prior to use on a new batch of clones. Razor blades used in propagation will be replaced every two weeks and any damaged or broken propagation equipment will be discarded and replaced to reduce the risk of cross contamination. Every week the cultivation staff will spray the cultivation areas and surfaces of the clone room with an alcohol/water solution (1.25 oz. alcohol/1 gal.

water). Shelves containing viable clones and the mother plants will be covered or shielded from the sanitizing spray to protect plant health while ensuring proper levels of sanitation in the

Propagation Area.

Special care will be taken when the cultivation staff is working with plant material that it knows to be infested to reduce the risk of cross-contamination. Infested plant waste will be separated from other plant waste, and the cultivation equipment will be cleaned and sterilized frequently to prevent any infested plant material from being lodged or stuck in the equipment. Agents working with infested plants will not transfer these plants to cultivation areas with healthy plants. All clothing and protective equipment worn while handling or working with infested plants will be thoroughly washed prior to reuse while the disposable latex gloves provided to cultivation staff working in infested cultivation areas will be thrown out immediately after leaving the contaminated area. Agents will thoroughly wash hands with soap and hot water for at least thirty (30) seconds prior to and after working with infested plants, after handling fertilizers, food, drinks, cigarettes or tobacco products, and after leaving one cultivation area to go to another.

Cultivation Area Sanitation

All cultivation benches and cultivation area walkways will be kept free of litter including growing media, plant matter, and general waste. All trash, plant debris, grow media, and root balls will be stored outside the cultivation areas to prevent any pests or pathogens that might inhabit this waste from infesting the cultivation areas. Benches, containers, trellising, and other reusable cultivation equipment will be cleaned regularly and sterilized after use to prevent the spread of pathogens from batch to batch. All tools used in cultivation will be cleaned and sterilized after use and the storage area in which they are stored will be regularly inspected and cleaned to reduce the chance of the tools becoming contaminated.

When preparing rockwool cubes to receive a clone, cultivation staff will be trained to first inspect the media for pathogens or irregularities. If the media passes this visual inspection, the rockwool cubes are to be soaked in a solution with a pH between 5-5.5 for 24 hours prior to planting. The bins used to soak the rockwool cubes will be cleaned and sanitized every time after use to prevent cross contamination of the media. The rockwool cubes themselves can be reused and will be soaked in a sanitizing solution for 24 hours prior to reuse.

The HVAC systems, CO2 controllers, humidifiers, and other environmental control equipment will be regularly inspected to ensure that they are working properly and that any filters or other replaceable parts do not need to be changed or replaced. Air ducts will be inspected regularly for leaks and breaks and will be repaired as necessary. The fixtures and ductwork connections will be regularly cleaned to prevent pathogens being spread through the air ducts. The Cultivation Director and Grow Team Leader will develop a maintenance schedule for these systems will schedule inspections and repairs as needed.

Inspecting Incoming Materials

Incoming shipments of grow media, nutrients, equipment, and other materials capable of harboring pests and pathogens will be thoroughly inspected upon receipt. The cultivation staff will conduct a thorough investigation of the new material and determine the types of pests and the severity of any infestation they find. Any plants or genetics supplied by another licensed cultivation facility will be quarantined and inspected prior to being integrated into the rest of the plant population. Incoming materials that are damaged, infested, or compromised will not be accepted by the cultivation facility and will be immediately removed from the cultivation premises. If the Cultivation Director or Grow Team Leader determines that an incoming batch of plants is infested beyond salvaging, the plants will be rejected and disposed of pursuant to the cultivation facility's waste disposal procedures.

Mother Stock Maintenance

The mother stock is the source of all the genetics in the cultivation facility. Because of this, it is imperative that the mothers be kept free of any disease, pest, or pathogen that might spread throughout the facility and destroy an entire crop. For the most part, the mother stock will be left alone outside of feeding and watering and inspection for pests and pathogens. Mother plants will be frequently pruned which allows the plants to grow healthy and vigorously and reduces the risk of contamination. Healthy plants naturally have better resistance to pests and pathogens so the cultivation staff will be focused on keeping the mother plants healthy and vigorous. Once a mother is producing productive clones, unproductive shoots and stems will be pruned to conserve resources for productive parts of the plant and limit the number of areas available for infestation. For example, low hanging leaves and stems will be pruned to prevent pests from the grow media or other growing surfaces do not have easy access to the plant. Cultivation staff will constantly scout for signs of pests and pathogens in the cultivation areas and will keep these areas free of litter and other materials that might harbor pests.

Mechanical Controls

Mechanical means of pest control typically include the use of mechanical devices to reduce pest populations and are intertwined with proper cultivation cultural practices. By exercising control over the cultivation environment to positively affect plant growth the cultivation staff will grow healthy plants capable of resisting pests and pathogens. Mechanical controls are the second line of defense after cultural practices in a properly implemented IPM system.

Controlling Extraneous Plant Material

Weed control is a prime example of a mechanical method of controlling pests. Many pests and pathogens can enter the cultivation facility on invasive non-marijuana plant material such as weeds. Weeds harbor diseases, mites, insects, and other pests and will be removed from the cultivation facility immediately upon discovery. Unhealthy plants are also prone to harboring pests and these plants will be quarantined or removed from the cultivation area entirely. Pruning infested plant parts is another effective means of reducing pest populations. By removing the pests' preferred habitat, cultivation staff will be able to reduce the pest population to a more manageable size that can be dealt with through sanitation and biological controls. Pest populations can often be contained just by removing a few infested leaves and shoots. If the entire plant is infested and pruning will not eradicate the infestation, the entire plant must be removed. The infested plant will be covered and wrapped in a large plastic garbage bag to reduce the risk of the pests spreading during removal of the plant from the cultivation area. The plant will not be cut in the cultivation area but will be removed while still in its container and transferred to the waste disposal area, as this can inadvertently spread pests. Weak, unhealthy, or malnourished plants will be carefully monitored as they are naturally more susceptible to pests and are more likely to attract diseases.

Environmental Control

Maintaining a proper cultivation environment is crucial to a successful IPM program. The proper levels in terms of temperature, humidity, water, and nutrients allow the plants to grow healthy and strong. Strong plants are better able to resist pest infestations so providing a cultivation environment that promotes healthy growth is a crucial aspect of pest management. The cultivation facility's automated environmental control system will ensure that each room remains precisely at the temperature, relative humidity, and CO2 levels programmed by the Cultivation Director or Grow Team Leader.

Insects and mites are cold-blooded organisms and can often be kept in check through careful control of the environment. These pests prefer warmer temperatures and the ambient temperature affects their reproductive, and developmental cycles and negatively impacts their ability to survive. Relative humidity levels are also an important variable in the life cycle of a pest. Mites prefer dry climates while most other insects prefer a humid climate to prevent internal moisture loss. The cultivation staff will balance the preferred temperature and humidity levels for the plants, and the pests that infest them and control the cultivation environment in a manner that optimizes plant growth while reducing pest levels.

Proper feeding and watering are crucial to maintaining plant health. Healthy plants are better able to resist attack from pathogens and cope with the stresses associated with eradicating pest infestations. Cultivation staff will continuously monitor nutrient levels and water and nutrients will be added to the drip irrigation system as needed. The Cultivation Director will ensure proper functioning of automated environmental control system including the lighting fixtures to provide optimal environmental conditions for vigorous, healthy plant growth. Watering schedules and media moisture monitoring will be specifically timed to avoid any under or over watering events and maintain consistent moisture levels in the grow media throughout the plant's life cycle.

Plant spacing is a typically overlooked pest management tool. Pests are more easily spotted when the plants in cultivation areas are uniformly shaped and spaced. Proper plant spacing allows agents scouting for pests to easily recognize abnormalities and irregularities in individual plants when they are compared to the crop as a whole. Properly spaced plants also prevent pest populations from spreading from one plant to another. Densely packed plants can act as a bridge for pests to quickly travel from plant to plant and can cause leaf overlap which provides a perfect environment for pathogens to thrive. Improper spacing can also cause unusual growth and improper node spacing on plants that are grouped too closely together. Extra plants can easily harbor pathogens and pests and these pests can spread from plant to plant with reasonable ease. Too many plants can easily reduce the overall yield of the facility despite the increased number of plants being cultivated. The Grow Team Leader is responsible for determining how many plants will occupy each table in order to maximize plant health and yield. Trellising plants provides pivotal support for proper health and growth of strong marijuana plants. Trellising also helps to prevent the rapid spread of pests and pathogens throughout a crop. By inducing the plants to grow upward, trellising reduces the number of lower branches and shoots that pests can use as bridges to healthy plants.

Laboratory Testing

Testing Plan and Procedures

Company will contract with independent third-parties, licensed as a marijuana establishment testing laboratories, for consulting in the development of exact methods of sampling and transport to test marijuana in accordance with M.G.L.C. 94G, § 15, the Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products, and Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries.

The company will engage two labs for analytical lab testing. A lab will be specifically contracted for testing of finished Marijuana products, and a separate lab will be contracted for soil/media and water testing: These labs will be contracted to conduct all required tests on, but not limited to, the following and analyses for, all batches:

- Pesticides and plant growth regulators
- Batches to be sold/dispensed as Finished Medical Marijuana Product:
- Metals
- Bacteria/fungi/mycotoxins
- Pesticides,
- Heavy Metals
- Microbiological contaminants
- Mycotoxins
- Cannabinoid profile

- Terpenes

Additional testing procedures for environmental media and water will be described in the following section; though testing of non-product material, will at a minimum, comprise of;

Soil or other solid media:

- Pesticides
- Metals, and other organic
- chemicals (e.g., PCBs)

Water sources for hydroponic cultivation:

- Pesticides,
- Metals
- Bacteriological contaminants

Flower Sampling

Sampling and Analysis Requirements

Sampling and analysis requirements will apply to all marijuana products dispensed by the company. The company will only dispense finished plant material. The results of the sampling and analysis are required for both quality control and labeling requirements (e.g., cannabinoid profile, testing certification), and thus fall integral to the business of cultivation.

Marijuana Testing Requirements

Testing for finished medical marijuana includes screening for chemical contaminants, biological contaminants, and cannabinoid profile testing .

Product problems will be reported to CCC when there is a concern about the quality, authenticity, performance, or safety of any finished medical marijuana. Problems with product quality may occur during manufacturing, shipping, or storage. These may include:

- *suspect counterfeit product;*
- *product contamination;*
- *defective components;*
- *poor packaging or product mix-up;*
- *questionable stability; and*
- *labeling concerns.*

Testing laboratories and other marijuana establishments may be the first to recognize a product quality problem. Individuals are encouraged to report any concerns to the CCC through their complaint process, or directly to the company which will report it to the CCC.

Contaminant Testing

Contaminant testing requirements are based on the contaminants potentially introduced at cultivation, packaging, and transport stages.

Marijuana will be cultivated and harvested in traceable “cultivation batches,” such that all marijuana within a cultivation batch has been produced with the same seed or plant stock, soil or other solid growing media, water, other agricultural/hydroponic inputs, and growing conditions. Cultivation batches will be sequentially numbered and traced throughout post-harvest production steps, and manufacturing/processing batch numbers must be included on the labels of all products to facilitate product recalls.

Finished Plant Material

Finished plant material dispensed to consumers consists of usable marijuana that has been trimmed and dried. Trimming includes removing the leaves immediately subtending the buds as well as any dead leaves or stems (. A “production batch” of finished plant material will be traceable to one or more cultivation batch(es). All production batches of finished plant material will be tested for pesticides and metals, which may be introduced during cultivation. Production batches intended for dispensing and direct use as adult use product will also be tested for biological contaminants (bacteria, fungi, and mycotoxins).

Finished plant material is tested instead of living or freshly harvested plants because drying and trimming may affect the concentrations of contaminants and because fungal/bacterial growth may occur during finishing.

Finished plant material that exceeds the limits for any contaminant included in the required testing will not be distributed as finished medical marijuana, instead will be destroyed at either the testing laboratory or returned to the facility for destruction.

Cannabinoid Profile Testing

All finished marijuana products will bear a label that identifies the list of ingredients, including the cannabinoid profile of the marijuana contained within the product, including the THC level. Therefore, for the purposes of labeling medical marijuana products, the cannabinoid profile must include, at a minimum, the percentage by dry weight of:

- tetrahydrocannabinol (9-THC);
- cannabidiol (CBD);
- tetrahydrocannabinolic acid (THCa);
- and cannabidiolic Acid (CBDa).

Usable Marijuana Content

The facility will label the product with the quantity of usable marijuana contained within the product, as measured in ounces. For finished plant material and products containing finished plant material the quantity of usable marijuana is simply the weight in ounces of the plant material in the product.

Sampling Program Design

Because it is not possible to test all marijuana products, the facility will collect representative samples to provide to the analytical laboratory. Specifically, each marijuana production batch must be sampled and analyzed, and the samples collected for a production batch must be representative of all of the medical marijuana in the batch. The protocol provides the following definition of production batch:

Production Batch means a batch of finished plant material made at the same time, using the same methods, equipment, and ingredients. The facility will assign and record a unique, sequential alphanumeric identifier to each production batch for the purpose of production tracking, product labeling, and product recalls. All production batches must be traceable to one or more marijuana cultivation batch(es).

Prior to Sample Collection.

The registered agent will assemble all equipment and information needed before beginning. Items to assemble before sampling include, but are not limited to, the following:

- Sample collection plan for each product type;
- Logbook or sample collection forms;
- Chain-of-custody forms (COCs);
- Disposable gloves;
- Decontaminated tool(s), such as a spatula, knife, sampling spear, or pipette;
- Stainless steel bowl and implement to homogenize the product (e.g., by stirring, chopping, or grinding);
- Clean, decontaminated surface for sample processing;
- Sample containers appropriate for the analyses required;
- Container labels and pen with indelible ink;
- Supplies to thoroughly clean, decontaminated and dry sampling equipment between samples; and
- A cooler with ice to keep samples cool until refrigeration or shipment to the laboratory.

Sample collection personnel will create a new entry for each sampling event in a sample collection logbook or prepare sample collection forms for documentation of sample collection.

Sample collection documentation will identify the sample collection date and start time, participating personnel, a general description of the product type and batch number sampled, a description of the sampling procedures used, and a record of batches that would potentially be impacted if analysis results indicate unacceptable contamination levels.

Sample collection personnel will identify or determine the cultivation batch number, production batch, and number of samples to be collected. The number of samples taken from each cultivation and/or production batch must be recorded in the sample collection logbook or forms. Record the sample cultivation and production batch identifiers (ID) for each sample. The batch IDs will be included on sample labels. In addition to the batch ID, the agent will create a unique sample ID for each sample. Sample identifiers will be unique for a given sample event. Record the batch and sample IDs in the sample collection logbook.

Any tools that contact the samples will be made of stainless steel or other inert material to avoid potential contamination of the sample. Appropriate sample containers will be made of suitable materials.

The agents will prepare sample labels and affix them to sample containers immediately before sampling. Information to include on the label includes at a minimum the batch and sample IDs and date/time of collection and by whom. Additional information that will be recorded in documentation, if not on the label, includes sample collector's name, product type, collection method, and other details about the product, such as MIP type or production method.

Sample Collection Procedure

1. Wear disposable gloves to mitigate potential for contamination of samples.
2. Ensure that the sampling area is clean and decontaminated and lay out any tools and equipment needed.
3. Collect the sample using an appropriate tool. Do not touch the sample with your hands or allow the sample to touch anything that might cause cross contamination.
4. If necessary, place the sample in the stainless-steel bowl or on a decontaminated cutting surface for homogenizing the sample using either the sample collection tool or separate clean, decontaminated implement.
5. Record the time each sample was collected and record any difficulties, inconsistencies with the sampling plan, or other remarks (e.g., environmental conditions) that might be relevant to data analysis or quality assurance.
6. To avoid cross contamination of samples, any tools or equipment that comes in contact with the finished plant material or other marijuana products will be cleaned before collecting the next sample.
7. All samples will be placed in clean, airtight sample containers that are large enough to hold the prescribed sample quantity with minimal headspace. Sample containers must be firmly closed and appropriately labeled.

8. To preserve the chemical and biological composition of the samples, they will be refrigerated or maintained on ice until shipped to the analytical laboratory.
9. Chain-of-custody paperwork will be completed immediately prior to shipment to the analytical laboratory.

Sampling will be performed such that the dried and trimmed inflorescences, or buds of the marijuana plant that are collected are representative in maturity and composition of the entire production batch of finished plant material. The sampling time frame for marijuana buds will be after the completion of the finishing of the plant material cultivation batch.

For items with component parts larger than 1 cm in any dimension, samples will be withdrawn by hand, then combined and mixed prior to analysis. If the primary samples consist of loose material, they will be combined to constitute the bulk sample for evaluation.

Quartering is a method to promote the representativeness of a homogenized marijuana sample. Quartering involves heaping the adequately mixed and homogenized ground product into a square shape, dividing the heap into four equal quarters, and selecting samples from two of the opposite quarters, which are mixed and sampled. The remaining quarters may then be combined and mixed, then used for microbiological and contaminant testing. The quartering process may be repeated until the required quantity is obtained, and the remaining material may be returned to the batch if possible.

After samples are collected, the entire production batch will be stored in a secure, cool, and dry location until analytical results are returned by the laboratory.

Sampling frequency is dictated by the production schedules. The amounts of sample required for cannabinoid or contaminant testing may vary by analytical method and laboratory-specific procedures, therefore the facility will confer with the laboratory to determine the minimum sample size required for evaluation. In all cases, the amount of sample supplied to the laboratory will be large enough and sufficiently homogenized to provide a representative sample of the production batch but not in excess to raise issues with possible diversion or waste disposal.

The company understands that the following sampling requirements, from MCR Labs, reflects an industry-average amount sufficient for most laboratories.

MCR Labs' Sample Sizes

Cannabinoid Profile	.3 grams
Terpene	.2 grams
Heavy metal	.3 grams
Pesticide	1 gram

Microbio analysis	1 gram
Mycotoxin	.5 grams

The company will adhere to the sampling size requirements with whichever lab it contracts with.

Quality Control (QC) Samples

Duplicate samples will be collected to provide verification of sampling and laboratory procedures. Specifically, a duplicate will be collected for 5 % of the samples collected for each \ marijuana product type. Duplicate samples are used to evaluate any variance in the sampling and analysis procedures. To ensure authenticity, it should be noted that QC samples will be taken on the same day, be derived from the same batch and documented on the CCC test results tracking sheet.

Soil and Water

Sampling Program Design

This section provides requirements and best practices for sampling program design for solids and water.

Solid Growing Media

Sources of solid growing media will be sampled and analyzed prior to use in cultivation and, upon any change in the source of solids. Once cleared for use in cultivation, cultivation growing media will be sampled and analyzed at least annually. The spatial distribution of samples must be considered to ensure representativeness across the entire cultivation operation. Sampling and analysis frequency, sample locations, and quality control (QC) samples are detailed below.

Minimum Sampling and Analysis Frequency.

Source Solids

- All source solids will be sampled and analyzed prior to use in cultivation.
- All source solids will be sampled and analyzed whenever a new source material is utilized (e.g., different source solid manufacturer).

- All source solids for initial use must be sampled at the rate of one (1) sample per cubic yard of solid media.
 - 6-inch rock wool cubes will be used. 216 6-inch cubes will comprise a cubic yard of solid media. The company would test one sample rockwool cube for every 216 rock wool cubes that it uses. However, this number falls below the mandated 5% of all solid containers required. For which reason the company will test 11 samples per cubic yard of solid media, totaling 5.09%.
- Source solids passing initial testing requirements will be stockpiled for later use without requiring re-analysis unless the stockpile has been contaminated or altered while stored. Situations for re-analysis may include but are not limited to solids that have been inundated by flood waters.

Sample Locations

- Solid growing media samples will be collected to be representative of the horizontal and vertical conditions of the growing configuration.
- When collected prior to distribution among beds or containers, source solids samples will be taken to best represent the overall source soils (e.g., collected from different areas and depths of a stockpile).
- Cultivation soil and solid samples will be collected to represent the broad range of cultivation units, growth stages, and soil and solid types whether from beds or containers.
- Samples will be analyzed individually as grab samples
- A diagram of the cultivation area, the sampling design, and the horizontal and vertical location of each sample will be created for each sampling event, and maintained on file for review by inspection authorities.

Quality Control (QC) Samples

Field duplicate samples will be collected at annually. Field duplicate samples will be collected and analyzed for each analytical method performed on the samples. Field duplicate samples will not be identified to the laboratory (blind QC). Blank samples are required to provide important information on potential positive bias on any positive results in field samples.

Equipment rinsate blanks are required whenever non-disposable sampling equipment is used to collect samples at multiple locations such as in source soil testing or testing of hydroponic nutrient solutions. Equipment rinsate blanks must be collected at the rate of one per sampling event per sampling equipment type with at least 1 equipment rinsate blank for every 20 field samples of the same matrix. Where equipment rinsate blanks are not appropriate (i.e., use of disposable sampling equipment, collection of just one sample location, or direct collection into the sampling container), field blanks may be used to evaluate potential for contamination and potential positive bias at the same frequency of 1 per sampling event per sampling equipment type with at least 1 for every 20 field samples of the same matrix.

Water

Water that is used in both solid-based and hydroponic cultivation techniques will be sampled and analyzed. The facility will incorporate a hybrid solid-based/hydroponic system for cultivation as well as a reverse osmosis water system for all water used in the cultivation process. Sample locations will consider the on-site water treatment system. Sampling and analysis described below is not intended to provide sufficient data for the establishment to manage optimum cultivation operations but rather to protect the public health. Additional sampling and analysis may be required to monitor nutrient levels, determine replacement of hydroponic solutions or water treatment filters, assess compliance with runoff/discharge requirements, or verify purity of water used in cultivation.

Minimum Sampling and Analysis Frequency

- Being filtered through a reverse osmosis system, our non-PWS water that is used in solid-based cultivation methods will be sampled and analyzed prior to use for cultivation of marijuana and on a quarterly schedule thereafter.

Sample Locations

- Water samples must be collected both before entering and after leaving the water treatment system, as close as possible to the point of use. The sample collected and analyzed after the water leaves the treatment system reflects the water applied to the plants, while the sample collected and analyzed before entering the treatment system characterizes the water source.
- For our open-loop hydroponic cultivation system, water samples will be collected to represent each system independently. There is no requirement to collect all water samples from different systems during the same sampling event: samples may be staggered throughout the quarter as long as all systems are tested within each quarter of the year.
- The sampling design and layout of tanks sampled will be retained and presented to the inspection authorities. A diagram of all water sampling locations will be created for each sampling event and maintained on file for review by inspection authorities. Any major changes to the water system since the last sampling event must be noted in sampling design.
- Water samples will be analyzed individually as grab samples. Composite sampling will not be used as they fail to meet the requirements of the facility's standards of sampling. Composite sampling fails to provide specific information regarding the source of the water. In addition, due to the boutique nature and tier-1 status, the facility does not significantly benefit from the scalability allowed by composite sampling.

QC Samples

Field duplicate samples will be collected at least annually and one (1) for every twenty (20) field samples of the water samples collected to provide verification of field and laboratory procedures. Field duplicate samples will be collected and analyzed for each analytical method performed on the samples. Field duplicate samples will not be identified to the laboratory (blind QC). Blank samples are required to provide important information on potential positive bias on any positive results in field samples.

Equipment rinsate blanks are required whenever non-disposable sampling equipment is used to collect samples at multiple locations such as in source soil testing or testing of hydroponic nutrient solutions. Equipment rinsate blanks must be collected at the rate of one per sampling event per sampling equipment type with at least 1 equipment rinsate blank for every 20 field samples of the same matrix. Where equipment rinsate blanks are not appropriate (i.e., use of disposable sampling equipment, collection of just one sample location, or direct collection into the sampling container) field blanks may be used to evaluate potential for contamination and potential positive bias at the same frequency of 1 per sampling event per sampling equipment type with at least 1 for every 20 field samples of the same matrix.

Sample Collection Procedures

The RMD is responsible for performing sample collection and analysis that is compliant with regulations and capable of representative sample collection and accurate analysis. The following section provides guidance to support RMDs engaged in medical marijuana cultivation to collect environmental media samples for analysis and to package and send the samples to the laboratory. Section 6.1 provides procedures for collecting solid growing media/soil samples, Section 6.2 provides procedures for collecting water samples, and Section 6.3 provides instructions for handling, storing, packaging, and sending the samples to the analytical laboratory.

All staff responsible for sample collection and sample handling will be trained in environmental sample collection. Staff will be responsible for maintenance of all training records and provision of the records to inspectors as required. Sampling and analysis staff will be taught and understand the sample collection plan, operation of sampling equipment, the importance of ensuring representativeness and integrity of the samples, documentation, and chain-of-custody requirements.

Collecting Samples of Soil or Solid Growing Media

The sampling methods described are applicable for collection of solid samples. Samples will be collected from individual containers during ongoing cultivation. Solid growing media samples will be collected that are representative of the horizontal and vertical conditions of the configuration.

Prior to Sample Collection.

The marijuana establishment agent will assemble all equipment and information needed before beginning. Items to assemble before sampling include, but are not limited to, the following:

- Sample collection plan or diagram of locations to ensure a representative sample collection
- Logbook or sample collection forms
- Chain-of-custody forms (COCs)
- Disposable gloves
- Decontaminated soil collection tool(s), such as a corer, spatula, or trowel
- Stainless steel bowl and implement to homogenize soil samples
- Clean, decontaminated plastic sheeting or other clean, non-porous surface for sample processing;
- Sample containers appropriate for the analyses required;
- Container labels and pen with indelible ink;
- Supplies to thoroughly clean, decontaminate and dry sampling equipment between samples; and
- A cooler with ice to keep samples cool until refrigeration or shipment to the laboratory.

Sample collection personnel will create a new entry for each sampling event in the sample collection logbook or prepare sample collection forms for documentation of sample collection. Sample collection documentation will identify the sample collection date and start time, participating personnel, a general description of the media and locations sampled, relevant environmental conditions, a description of the sampling procedures and equipment decontamination/cleaning used, and a record of plants or batches that would potentially be impacted will analysis results indicate unacceptable contamination.

Sample collection personnel will identify or determine the number and location of solid growing media grab samples to be collected. Sample locations from containers, beds, or other cultivation units must be recorded in the sample collection logbook or forms. Record the sample location identifier (location ID) for each sample so that it can be utilized to identify the physical location of the cultivation unit.

Location identifiers will be consistent across sampling events to allow tracking of repeated sample locations. The location IDs will be included on sample labels (unless the grab samples are used in a composite sample). In addition to the location ID, create a unique sample ID for each sample. Sample identifiers will be unique for a given sample event. Record the location and sample IDs in the sample collection logbook.

Any tools that contact the samples will be made of stainless steel or other inert material to avoid potential contamination of the sample. Sample containers will be made of suitable materials for the methods and analytes being analyzed. The sampler will avoid using insect repellents that may interfere with sample integrity.

Preparing sample labels and affixing them to sample containers immediately before sampling is recommended. Information to include on the label includes at a minimum the location and sample ID and date/time of collection. Additional information that must be recorded in documentation if not on the label includes sample collector's name, media type, collection method, whether the sample is a grab or composite sample, and soil or core depth (if applicable).

Sample Collection Procedures

Collect the planned samples from each sample location one at a time. Follow these basic steps for each sample:

1. Don gloves to mitigate potential for contamination of samples
2. Spread clean, decontaminated plastic sheeting or other nonporous surface near the sample location and lay out any tools and equipment needed.
3. Clear the surface of the location if necessary excluding detritus, dead leaves, stones, pebbles, or other debris from the soil or other solid growing media with a clean trowel or similar tool.
4. Collect the sample using an appropriate tool. Do not touch the sample with your hands or allow the sample to touch anything that might cause contamination.
5. Place the sample in the stainless-steel bowl for homogenizing the sample using either the sample collection tool or separate clean, decontaminated implement.
6. Record the time each sample was collected and record any difficulties, inconsistencies with the sampling plan, or other remarks (e.g., environmental conditions) that might be relevant to data analysis or quality assurance.
7. To avoid cross contamination of samples, any tools or equipment that come in contact with the soil or growing media must be cleaned before moving to the next sampling location.
8. All samples will be placed in clean, airtight sample containers that are large enough to hold the prescribed sample quantity with minimal headspace. Sample containers must be firmly closed and appropriately labeled.
9. If grab samples are planned, place the homogenized sample into the appropriate container(s).
10. Samples will be refrigerated or maintained on ice until shipped to the analytical laboratory.
11. Chain-of-custody paperwork will be completed immediately prior to shipment.

Collecting Water Samples

The following sampling methods are generally applicable to collection of water samples for cultivation. The facility will make sure to characterize both the untreated and treated water to document both expected contaminants that might be introduced into cultivation as well as the maximum or untreated levels. Water samples will be collected to be representative of the process and water quality throughout the time period of sampling, although composite samples

are not required. To achieve representativeness, samples will not be collected during any periods of unusual activity such as draining of water lines, immediately after changing treatment cartridges or replenishing of hydroponic nutrient solutions.

Prior to Sample Collection.

The marijuana establishment agent will assemble all equipment and information needed before beginning. Items to assemble before sampling include, but are not limited to, the following:

- Sample collection plan or diagram of locations to ensure a representative sample collection
- Logbook or sample collection forms
- Chain-of-custody forms (COCs)
- Disposable gloves
- Clean, decontaminated plastic sheeting or other clean, non-porous surface for sample processing;
- Sample containers appropriate for the analyses required;
- Preservatives as required for the analyses or pre-preserved containers
- Supplies (such as pH paper or meter) to verify adequate preservation
- Container labels and pen with indelible ink;
- Supplies to thoroughly clean, decontaminate and dry sampling equipment between samples; and
- A cooler with ice to keep samples cool until refrigeration or shipment to the laboratory.

Sample collection personnel will create a new entry for each sampling event in the sample collection logbook or prepare sample collection forms for documentation of sample collection. Sample collection documentation will identify the sample collection date and start time, participating personnel, a general description of the media and locations sampled, relevant environmental conditions, a description of the sampling procedures and equipment decontamination/cleaning used, and a record of plants or batches that would potentially be impacted will analysis results indicate unacceptable contamination.

Sample collection personnel will identify or determine the number and location of water samples to be collected based on the requirements described in Section 5.1. Sample locations must be recorded in the sample collection logbook or forms. Record the sample location identifier (location ID) for each sample so that it can be utilized to identify the physical location of the sample location within the RMD. Location identifiers will be consistent across sampling events to allow tracking of repeated sample locations. The location IDs will be included on sample labels (unless the grab samples are used in a composite sample). In addition to the location ID, create a unique sample ID for each sample. Sample identifiers will be unique for a given sample event. Record the location and sample IDs in the sample collection logbook or forms as well as the volume of the sample, preservation, and associated sample containers.

Any tools that contact the samples will be made of stainless steel or other inert material to avoid potential contamination of the sample. In addition, all the tools that come in contact with the sample media will be rinsed with deionized water between samples to reduce potential cross contamination. Sample containers will be clean and dry, and made of suitable materials appropriate for the methods and analytes being analyzed.

Preparing sample labels and affixing them to sample containers immediately before sampling is recommended. Information to include on the label includes at a minimum the location and sample ID and date/time of collection. Additional information that must be recorded in documentation if not on the label includes sample collector's name, media type, collection method, whether the sample is a grab or composite sample, and preservation (if applicable).

Sample Collection.

Collect the planned samples from each sample location one at a time. Follow these basic steps for each sample:

1. Don gloves to mitigate potential for contamination of samples
2. Spread clean, decontaminated plastic sheeting or other nonporous surface near the sample location and lay out any tools and equipment needed.
3. Prepare the sample location by removing faucet aerators if connected. Note the location of any water treatment systems and remove if required to represent pre-treatment location.
4. For sample collection of water lines, purge the lines of standing water and note purge time in sample collection documentation. Generally, for frequently used water 15 minutes run time is considered sufficient but actual time for purge depends on pipe volume and frequency of use. Note that pressurized lines may require additional system specific procedures. Sample collection personnel may monitor parameters including but not limited to temperature, pH, or turbidity for stability to assess the sufficiency of purge.
5. For collection of water samples from tanks or other holding bins without valves or taps such as in some hydroponic systems, dip sampling may be used. However, sample collection staff will be aware of potential for vertical distribution of additives and strive to take a sample representative of the overall tank or trough. In cases where contaminants of concern may be stratified and not distributed uniformly throughout a container, a discrete depth sampler such as Kemmerer or van Dorn sampler may be recommended.
6. Open the pre-labeled sample containers appropriate for the analyses taking care to not allow errant drips or splashes off other surfaces to enter the caps or containers.
7. Samples for all analyses may be collected directly into sample containers or into a larger, inert vessel then poured into containers. During sample collection, make sure that the tap or spigot does not contact the sample container.
8. If water samples are to be composited to represent multiple hydroponic systems, repeat the steps above to collect the primary samples. The individual, primary samples will all be collected as unpreserved samples then combined volumetrically into a single composite sample.

9. Record the time each sample was collected and record any difficulties, inconsistencies with the sampling plan, or other remarks (e.g., environmental conditions) that might be relevant to data analysis or quality assurance.
10. Add preservatives according to the analytical methods as required.
11. Fill an extra sample container to verify adequate preservation and/or residual chlorine as required by analytical methods.
12. If a non-disposable sample collection tool other than the sample container (larger inert vessel, ladle, Kemmerer sampler, van Dorn sampler) is used, rinse the tool with deionized water between samples.
13. Excess sample collected but not shipped to the laboratory for testing will be disposed of properly recognizing that preserved samples may require disposal as hazardous materials. It is not necessary to send the entire volume of the combined primary samples to the laboratory.
14. Samples will be refrigerated or maintained on ice until shipped to the analytical laboratory.
15. Chain-of-custody paperwork will be completed immediately prior to shipment.

Sample Handling

After samples are properly collected and labeled, they will be delivered for analysis as soon as possible. This section describes how to handle, securely store, package, and ship the samples to the laboratory.

- Sample containers both empty and once containing samples will be stored in a contaminant-free environment to the degree possible. Sample containers will not be stored for more than one (1) year.
- Preservatives and pre-preserved sample containers may degrade after several months. Contact the laboratory to verify limits on sample container use.
- All samples will be collected and stored in containers of the appropriate materials based on the analysis method being performed.
- Until the samples are analyzed, they will be preserved to minimize chemical or physical changes according to the analytical method references.

Sample Storage.

- Samples will be refrigerated or maintained on ice (4 °C +/-2°C) until they are shipped to the analytical laboratory.
- Placing the samples in airtight containers with minimal headspace preserves samples by minimizing moisture loss and chemical exchange between the sample medium and air.
- In addition, protect the samples from excessive light exposure to minimize photochemical degradation. Samples can be protected from light by using an amber sample container, storing the samples in a closed box or other amber container, or in a dark storage location.

- To be considered valid, all samples must be analyzed prior to expiration of the technical holding time as defined in each analytical method. Note that the holding time for some biological components is very short; 24 to 48 hours from the time of collection,
- Note that all collected samples are considered under the custody of sample collection staff following collection and prior to shipment. Samples will be maintained either under the supervision of someone responsible for the integrity of the samples or locked to prevent mishandling.
- Chain of custody seals may be used by sample collection staff to ensure that samples are not tampered with following sample collection.

Packing and Shipping Samples.

- Package the samples for shipping in a clean area free of contamination.
- Make sure that sample containers are clean, lids are tight and will not leak and that all samples are properly labeled as described above. Covering labels with clear tape is recommended for protection in the event of a leak or damage to the package.
- Conduct an inventory of sample IDs against the chain-of-custody documentation form to make sure that all samples and containers are present.
- Seal sample containers in clear plastic bags with labels visible.
- If the samples need to be kept cold during transport, pack the samples in a clean waterproof metal or hard plastic ice chest or cooler with double-bagged ice or ice packs. Samples will be maintained at 4 °C +/-2°C at all times. Be sure that the samples are already cool when packaged for transport.
- When samples are transported in a cooler, line the cooler with plastic (e.g., large heavy-duty garbage bag) before packing. If the cooler has an external drain, make sure it is plugged.
- Include noncombustible absorbent transporting materials to protect the samples from damage.
- Enclose chain-of-custody forms and any other necessary documentation in a sealed waterproof plastic bag. If applicable, include instructions or a transport manifest for return of the cooler.

Reporting limits are recommended based on the capabilities of appropriate methods.

All waters must demonstrate that waters used for cultivation meet the acceptable limits of the most recently promulgated Massachusetts Maximum Contaminant Levels (MMCLs) for metals, bacteriological, and pesticide residues.

All sample analyses described in this protocol will be conducted by independent testing laboratories, one for the testing of the finished product and another for the testing of grow media and water. Should there be any testing results that indicate unacceptable levels of any substance, the company will take steps to remedy the issue by complying with its recall

procedures. Transport to and from the facility will comply with the policies, protocols, and procedures outlined in the transportation section.

Product Complaints

Due to the Applicant's thorough Quality Assurance policies and procedures, any issues with cannabis and cannabis products will be easily tracked, should they arise. Following a report of potentially contaminated cannabis or cannabis products, employees will investigate the complaint in accordance with the protocols set forth herein, and determine if a voluntary or mandatory recall is necessary.

Once a product issue has been confirmed, Applicant and its employees will make it a priority to seal, isolate, and prevent the further distribution of marijuana that may be contaminated or present a risk to the health and welfare of those that come into contact with the product. The Applicant's employees will document the investigated source of the incident and take appropriate corrective measures. Immediately upon notification of any and all critical complaints (as further defined herein), the Applicant's policy requires prompt reporting to the CCC within 24 hours, including a written report stating the Applicant's rationale for determining the complaint to require further action, or no further action, voluntary recall, or mandatory recall.

Process for Accepting Complaints at the Facility

Receiving Complaints.

All employees will be trained to receive and handle complaints including, but not limited to, proper use of investigative questioning and verbal de-escalation techniques. It is the responsibility of all Company employees to ensure the recording of any complaint upon receipt, regardless of where the complaint came from. The Applicant will accept complaints through all mediums including, but not limited to: in person, by phone; and by email.

Initial Retention.

Upon receipt, all employee personnel will be trained to record, at a minimum, the basic contact information of the complainant and information about the product, if applicable. All written complaints will be immediately forwarded to the Director of Quality Assurance, who will ensure that the accuracy of the initial information recorded, which will include:

- 1) The reason for the complaint;
- 2) The complainant's name;
- 3) The complainant's address;
- 4) The complainant's phone number;
- 5) The product name; and

- 6) The lot number (if available).

Complaint Classification.

The Director of Quality Assurance will classify the complaint and then assign it to the appropriate personnel. If the Director of Quality Assurance decides the complaint is without merit or warrants no further action, the complainant is advised of the reason why the complaint was rejected. The Director of Quality Assurance will immediately classify any complaint received at the time of receipt. A complaint can fall into one of the following general categories:

- 1) Product Complaint;
- 2) Complaint; or
- 3) Miscellaneous Complaint.
 - (a) All Product Complaints and Complaints will be assigned to the Applicant's management-level employee that is designated as a Quality Assurance Manager; and
 - (b) All miscellaneous complaints will be assigned to the appropriate management-level employee for disposition in accordance with the Applicant's Complaint Response Procedures.

Initial Complaint Recording.

Upon receipt of a Product or Complaint, the Quality Assurance Manager will assign a sequential complaint number to each complaint and enter the complaint information in the Applicant's Product Complaint Log.

Initial Complaint Reporting.

Any product complaint involving a serious or unanticipated adverse event (as defined below) must be reported to the CCC immediately by phone. The Applicant will ensure that its employees are trained in all applicable reporting procedures and requirements. Any employees that become aware of a product complaint has a duty to inform the Director of Quality Assurance immediately.

Standard Procedures for Receiving Complaints.

Once a complaint has been received, the necessary, accurate, and detailed documentation and product tracking procedures will commence immediately. The Director of Quality Assurance is responsible for ensuring the following initial steps are taken:

- 1) Gathering information from the complainant about the situation;
- 2) Assembling appropriate employees to conduct a thorough investigation;
- 3) Determining the nature and potential reasons for the complaint;
- 4) Evaluating the chances that this issue has affected other cannabis and cannabis products;
- 5) Recording all relevant information (as further set forth below); and

- 6) Deciding the proper course of action (subject to approval by the Director of Quality Assurance).

Designated Response Employee.

Complainants will be provided the contact information of the Applicant's staff member who will be assigned the responsibility of Designated Response Employee. The Designated Response Employee will answer questions regarding submitted complaints and work to ensure the complainant is regularly updated with the status of the complaint as further set forth herein. The Designated Response Employee will also provide monthly reports on the progress of complaints received as applicable.

Product Complaint Log.

As part of the Applicant's stringent record keeping policies and protocols, the Applicant has set forth specific requirements for documenting information relative to any product complaint received. As part of the process for receiving a complaint, the Director of Quality Assurance will ensure that the complaint and corresponding procedures are properly recorded. In addition to the initial information recorded, the Company's Product Complaint Log must include, at a minimum, the following information:

- 1) Medium of communication (email, phone, etc.);
- 2) The name of the person or group filing a complaint. If the complaint is submitted by a group, the record must include a contact name for the group. Applicant will attempt to maintain confidential the identity of the complainant, but cannot guarantee confidentiality in all cases;
- 3) Date the complaint was received;
- 4) Original correspondence if the complaint is in any form of writing;
- 5) A description of the circumstances leading to the filing of the complaint;
- 6) A description of the remedy sought by Complainant (as applicable);
- 7) The product information including product type and strength;
- 8) Name of employee who received the Complaint;
- 9) Appropriate investigation procedures to be conducted considering the type of complaint (see more below);
- 10) The outcome of the investigation; the steps the Company took to resolve the issue; and the name of the employee responsible for resolving the issue; and
- 11) Date the Complaint is officially resolved.

Credible Complaints

In accordance with all applicable laws and regulations and the Applicant's procedures set forth herein, any credible product complaint or complaint stemming from Applicant's cultivated cannabis will be immediately dealt with by the Applicant in a courteous and professional manner.

Product Complaints and Complaints.

The Director of Quality Assurance and authorized employees will be responsible for conducting a thorough investigation. All investigations and evaluations conducted by the Applicant's authorized employees will be based on best industry practices and scientific principles. Based on the situation, the Applicant may order for retesting of certain products in accordance with specifications whenever appropriate. The Director of Quality Assurance will classify all Product Complaints and Complaints into one of three (3) categories:

- 1) Critical Complaints. These complaints include those where efficacy of product is in question e.g. label mix-ups, overdosing, or some critical side effects or adverse drug reactions which may cause death of the consumer. These complaints include Critical Adverse Events and Unexpected Adverse Events as further discussed below.
 - a) In the event Company received a Critical Complaint, the Director of Cultivation will designate 3-4 employees to comprise a product investigation team responsible for conducting a thorough investigation as further outlined below;
 - b) Critical Adverse Experience: An adverse event occurring at any dose of cannabis that results in any of the followings: death; a life-threatening experience; hospitalization; prolongation of existing hospitalization; a persistent or significant disability or incapacity; or a congenital anomaly (birth defect);
 - c) Unexpected Adverse Experience: An adverse experience not listed in the current labeling or consumer insert for the cannabis product. This includes events that may be symptomatically related to a listed event, but differs from the event because of greater severity or specificity;
 - d) For unexpected and critical adverse experiences, the Director of Quality Assurance must report these types of complaints to the CCC within twenty-four (24) hours of receipt.
- 2) Major Complaints. These Complaints include those which may put consumer at some risk, but are not life threatening and are quality related e.g. inset residue, color fading, or deformed manufactured products.
 - a) In the event the Applicant receives a Major Complaint, the Director of Quality Assurance will designate employees to comprise a product investigation team responsible for conducting a thorough investigation as further outlined below.
- 3) Minor Complaints. These Complaints include those which are not life threatening, e.g. shortage or excess quantity received, improper sealing of packages, or improper labeling.

- a) In the event Company receives a minor complaint, The Quality Assurance Manager will either: handle the resolution process of the complaint individually; or designate qualified employees to do so as necessary.

Miscellaneous Complaints.

For all Miscellaneous Complaints, the ownership will assign the disposition tasks associated with these complaints to the appropriate management-level employee based on the type of complaint. Miscellaneous complaints may include, but are not limited to:

- 1) General nuisance complaints (i.e. noise, odor, loitering);
- 2) Service-related issues;
- 3) Employee-related issues; or
- 4) Other operational related issues.

Product Recall / Withdrawal

Customer health and safety is a top priority for the Applicant. Accordingly, the Applicant is committed to consistently producing quality, safe, effective cannabis. To this end, the Applicant will do everything in its power to prevent any defective, misrepresented, or contaminated products, or products of insufficient quality, from reaching a licensed dispensary. Upon the discovery of product contamination, safety concerns, consumer adverse reaction, or quality-related issues, the Applicant will quickly and efficiently carry out recall or withdrawal procedures in accordance with this plan in order to protect the health and wellbeing of all. The company believes the most efficient way to ensure that a recall or withdrawal is effective is to have a detailed recall and withdrawal plan already in place, in case of emergency. 935 CMR 500.120(12)(b).

Product Recall & Withdrawal.

There are two distinct pathways for action that involve the removal of a product from the market;

- 1) Product Recall: A recall is generally undertaken when there is verifiable evidence that a product is defective or has health and safety hazards that reasonably could or already have caused adverse reactions or health problems. The classification of a recall typically involves the presence of bacteria, a substance that may cause a potential allergic reaction, or some other contaminants that could cause adverse reactions in Consumers, whether such reaction is serious or temporary. The term

“recall” will only be used when mandated by verifiable evidence (i.e., analytical test results) that the affected product poses significant health and safety risks to the consumer population. Any determination to implement recall procedures must be supported by test results or other scientific documentation or expert opinion.

- 2) Product Withdrawal: A withdrawal is typically conducted when there is a quality-related issue with derivative products that are not likely to pose health risks, or as a precautionary measure prior to an official recall when health or safety risks are suspected, but not yet verifiable.

Examples of Situations Requiring Recall or Withdrawal. The following list, which is NOT EXHAUSTIVE, identifies incidents requiring a recall or withdrawal:

1. Product found to any amount of pesticide residue from an illegal/restricted chemical;
2. Product found to have an amount of pesticide residue that exceeds the US Environmental Protection Agency’s tolerances for pesticide chemical residues in food provided in 40 Code of Federal Regulations (CFR) 180;
3. Product found to exceed the microbiological contamination, mycotoxin, or heavy metal limits set forth in applicable laws and regulations;
4. Product found to have more than 10 parts per million (PPM) of residual solvent;
5. Known, assumed or suspected product contamination by chemical, physical or microbiological hazards;
6. Incorrect labeling which may constitute a breach of product safety, quality, or legality standards;
7. Known or suspected malicious contamination;
8. Internal quality testing of improperly stored/packaged/labeled products reveals contamination or adulteration;
9. Severe customer or consumer adverse reaction to derivative product, once investigated and reasonably suspected or determined to be due to product quality- or safety-related issues, and therefore not likely to be an isolated incident.

Responsibilities During Recall/Withdrawal.

The Director of Quality Assurance will be primarily responsible for the determination of the need for a product recall or withdrawal and oversight of the execution of recall and withdrawal procedures. If the Director of Quality Assurance is unsure of the need for recall or withdrawal or appropriate event classification, all management-level employees may be asked to participate in determination. In some circumstances, the Applicant may bring in experienced third-party contractors to participate in procedural oversight, if necessary.

Recall and Withdrawal Team.

The Director of Quality Assurance will select and maintain a Recall and Withdrawal Team, composed of the Applicant’s selected management-level employees, which will be responsible

for executing withdrawal and recall procedures. The team will be responsible for coordinating all aspects of a withdrawal or product recall. Together the team will assist the Recall and Withdrawal Coordinator in the event of a recall or withdrawal event in accordance with the procedures in this plan. All team members must ensure that all procedures are carried out effectively and efficiently. The Director of Quality Assurance will ensure the team receives appropriate training utilizing mock withdrawal and recall procedures semi-annually so that they understand their responsibilities and are prepared to execute. The Director of Quality Assurance must maintain a Recall and Withdrawal Team list, and update its quarterly to ensure all names, contact phone numbers and responsibilities of team members and alternates are updated.

Procedures for Product Withdrawal/Recall

Initial Steps of a Product Withdrawal/Recall.

After being notified of an incident that may require a product recall or withdrawal, the Applicant will ensure the following policies are adhered to:

- 1) Proper Complaint Handling and Investigation: The person receiving the complaint will adhere to the complaint response and investigation plan discussed above and determine the appropriate course of action;
- 2) Provide Notifications: Provide notification to the CCC, the Applicant's legal counsel, insurance, management personnel, and state agencies as required:
 - a) The Director of Quality Assurance must notify all investors of the investigation and discuss event classification;
 - b) The Director of Quality Assurance must notify legal counsel in writing that a situation meets the criteria for a recall or withdrawal. Any recommendations by counsel for alternative procedures must be approved; and
 - c) The Director of Quality Assurance must notify the insurance company and determine coverage;
- 3) Assess and Classify the Event: Conduct an assessment to determine the procedures to implement. Items to consider include:
 - a) Whether or not adverse reactions or serious health issues have already occurred from the use of the product;
 - b) Hazard to various segments of the population (e.g., immune-compromised consumers undergoing chemotherapy) who are expected to be exposed to the product being considered;
 - c) Degree of seriousness of the health hazard to which the population at risk would be exposed; and
 - d) Likelihood of occurrence of hazard.

Tracking Affected Product(s).

The Applicant will ensure that any affected products are tracked immediately and determine the type of product(s) affected:

- 1) Finished Product: All derivative products that have been packaged and partially or completely distributed, including products for sale in dispensary facilities. If the affected product is a finished product:
 - a) Assemble personnel needed to conduct tracking of a finished product;
 - b) Identify affected and any other potentially affected product(s), product identifiers(s) and production date(s);
 - c) Determine the quantity of affected product(s) produced;
 - d) Determine from the automatic data processing software system the last day of shipment/dispensing (and the recipient) for the affected product(s);
 - e) Determine from the tracking systems all authorized Customers who purchased the affected product(s) during this period (i.e. period = day of packaging to last day of shipment).
- 2) Work in Progress. All derivative products that have not been distributed and their constituents, including, but not limited to, cannabis plants, cannabis and derivative products in storage, and in-process derivative products. If the affected product is a work in progress:
 - a) Assemble the personnel needed to conduct tracking of a work-in-progress product;
 - b) Identify the affected and any other potentially affected product(s), product identifiers(s) and production date(s) from the production records;
 - c) Determine from tracking systems and production records the quantity of the affected product(s) produced;
 - d) Locate the affected product(s) from the production and storage areas.
- 3) Ingredients. All ingredients, including crop inputs and derivative product constituents, used in cultivation and processing operations. If the affected product is an ingredient:
 - a) Assemble the personnel needed to conduct tracking of an ingredient;
 - b) Identify the affected and any other potentially affected ingredient(s) and lot number(s)/production code(s)/best before date(s)/receiving date(s);
 - c) Determine the quantity and receiving date of the affected ingredient(s) received;
 - d) Based on the lot number/receiving date, determine from the production records the period of use for the ingredient;
 - e) Determine from the production records all finished product(s) produced with the affected ingredient(s);
 - f) Determine from the production records the quantity of the affected product(s) produced during this period;
 - g) Determine from the production records and inventory records the day the affected product(s) entered company inventory (i.e. packaging date);
 - h) Determine from tracking systems the last day of shipment (and the recipient) for the affected product(s);

- i) Determine from the tracking systems all clients who purchased the affected product(s) during this period (i.e. period = day of packaging to last day of shipment);
- j) Determine from the inventory management portion of the tracking systems the remaining quantity of the affected product(s) in the company's inventory.

Execute Withdrawal or Product Recall.

After the Director of Cultivation takes the initial steps of a product withdrawal or recall and the type of product is identified, the Applicant will ensure the following steps are taken:

- 1) Assemble the Recall and Withdrawal Team, ensuring adequate resources are available for the severity of the issue;
- 2) Gather all information collected in the tracking process;
- 3) Detain and segregate all products to be recalled or withdrawn which are in the Applicant's control. Attach a "DO NOT DISTRIBUTE" sign, place in quarantine, and complete any relevant internal logs/forms;
- 4) Send appropriate notifications, whether to consumers, via press release, other vendors or laboratories;
- 5) Ensure the following information is accurately recorded:
 - a) Name and Product Identifier of the withdrawn/recalled product(s);
 - b) Production date(s), harvest batch, forms, harvest lots and process lots;
 - c) Reason for withdrawal/recall;
 - d) Quantity of withdrawn/recalled product(s) distributed;
 - e) Quantity of withdrawn/recalled product(s) in inventory (for internal use only); and
 - f) Site(s) of end-user distribution (i.e., dispensary facilities) and clients affected (for internal use only).
- 6) Coordinate and monitor the recovery of all affected product(s); all products in the homes of consumers will be picked up by a licensee in accordance with all applicable laws and regulations;
- 7) Using the tracking systems, conduct a reconciliation of the total quantity of recalled product and affected product in inventory against the total quantity produced;
- 8) Contact the Approved to request sampling and testing of recalled or withdrawn product(s), as appropriate;
- 9) Test results and corrective actions must be recorded internally and discussed with the appropriate state agencies, if applicable;
- 10) The Director of Quality Assurance must prepare an internal Withdrawal and Recall Report, which will be saved in the secure cloud-based records system for a minimum of seven (7) years. The recall report will include the individual overseeing the disposal, method of product disposal, date of disposal, quantity and product description, and any other information required by the CCC;

- 11) After all procedures have been completed and the affected product(s) have been removed from the market and the Applicant's inventory, the Executive Employees and Director of Quality Assurance will oversee disposal of affected product in accordance with the Waste Disposal Plan of this Application.

Follow-Up Measures.

After the above procedures have been carried out and the affected product(s) have been properly disposed of, the Director of Quality Assurance will conduct a root cause analysis and report the effectiveness and outcome of the recall or withdrawal. The Director of Quality Assurance will also conduct a meeting with the Recall and Withdrawal Team, the Quality Assurance Manager all other involved parties will partake in evaluation and suggestions for improvement.

Recall and Withdrawal Training.

The Applicant will ensure that its employees are properly trained on both withdrawal and recall procedures by conducting drills as follows:

- 1) The Director of Quality Assurance will develop and implement all necessary withdrawal and recall training for all agents including mock recall events;
- 2) At least semi-annually, the Applicant is conduct mock recalls to determine whether the withdrawal and recall procedure is capable of identifying and quickly controlling a batch of potentially affected product and reconciling the quantities produced, quantities in inventory, and quantities distributed;
- 3) A mock recall or withdrawal will identify potential problems and allow agents to become familiar with recall procedures. If problems are identified in the procedures, the Director of Quality Assurance must correct them, and the agents must be retrained on all new procedures;
- 4) The Director of Quality Assurance will play central roles in the development and oversight of withdrawal and recall training as well as mock recalls and withdrawals.

Drill Procedures.

The Director of Quality Assurance in coordination with the Executive Employees must ensure that Applicant carries out mock recall or withdrawal procedures in the facility facilities at least semi-annually by randomly selecting at least two (2) cannabis strains.

- 1) The mock procedures will follow all regular procedures; however, no product will be retrieved from authorized customers or removed from inventory or storage;

- 2) All information obtained during a mock withdrawal or recall drill must be documented internally;
- 3) All parties involved in a mock withdrawal must be notified immediately that it is a mock procedure;
- 4) The mock recall file will include the name, address and telephone number of clients for the batch tested, production records and the processing, inventory and distribution history of each lot involved; and
- 5) All recommended corrective actions and deficiencies must be documented in a mock withdrawal and recall report to be submitted to the Director.

The Director of Quality Assurance must correct any deficiencies, and if necessary, procedures will be modified to improve withdrawal and recall performance and efficiency. If procedures are modified, all the Applicant's agents must be re-trained on new procedures.

Recordkeeping

The Company is committed to maintaining a fully transparent set of business and operational records. All facility records and recordkeeping activities are the responsibility of the Company's Management, including implementing, maintaining, and revising the Company's recordkeeping policies and procedures through continual evaluation, discussion, and review of their effectiveness. The facility's recordkeeping policies and infrastructure shall include, at least, METRC inventory tracking software, Backup Track-and-Trace software, a Record Storage Room, an ENVR and hard-disk storage device, and a secure, cloud-based server for redundant backups of all electronic records.

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Scope

This section describes the policies and procedures of J – B.A.M., Inc. (“J-BAM” or the “Company”) with respect to operational, business, financial, and regulatory recordkeeping. The policies and procedures have been established in compliance with 935 CMR 500 and specifically 935 CMR 500.105(8)- 935 CMR 500.105(9). The following Table of Authorities has been provided for the purposes of ease of assessment. Each requirement made express under 935 CMR 500 is tabled with the page number of the application where its respective compliance can be found. This table does not eliminate the possibility that the 935 CMR 500 requirements are found to be complied with elsewhere in this document. The table serves solely to ease assessment of regulatory compliance, not to self-impose a limited review on the application process.

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Recordkeeping Policy Overview

The Company's recordkeeping policies are intended to promote standardized recordkeeping that discourages diversion, unlawful release of information, and other negative activity. All policies and procedures related to recordkeeping have been designed to ensure the confidentiality, integrity, and security of all current and retained recorded information.

The Company will install a recordkeeping network infrastructure that is designed to automatically create, protect, store, and backup all records, recordings, and data generated on the facility premises. Operations data, security data, and other records will be automatically backed up on the facility's encrypted, cloud-based storage server on a daily basis to prevent any loss of data. The Company's electronic records can only be accessed by members of Management and other authorized agents, and records will not be shared with third parties except in compliance with CCC rules and applicable laws and regulations. Each time recorded data is accessed, the activity will be tracked and tied to an agent using the agent's specific login credentials. The Company will incorporate digital recordkeeping automation through the use of Document Management Software ("DMS"), which increases efficiency and reduces discrepancies that may occur through agent physical recordkeeping procedures.

Most physical copies of the Company's records will be stored in a locked, fireproof file cabinets in the Record Storage Room. Physical records used in daily operations, such as the Visitor Logbook, will be stored in a secure, lockable container in the operations area in which they are used. Once these operations records are completed, they will be transferred to the Record Storage Room and stored in one of the filing cabinets. As part of the Company's recordkeeping policies, all physical copies of records will be scanned and uploaded onto the facility's digital storage system by the COO at monthly intervals.

The creation and capture of the Company's records, documents, and data will be automatically initiated by the many computer terminals and software used at the facility as well as on physical log sheets or booklets. Computer terminals, stationed at the Reception Desk, Administration Office, and Security Office, will be the point of data and document creation for

all business, security, and financial records, facility appointment schedules, digital communication including communication with CCC representatives, and vendor and affiliate information. The Company's METRC inventory control system terminals shall be stationed in the vault area, and other storage areas, the cultivation areas, dry, cure, and trim rooms, as well as in the packaging, labeling, and shipping areas. These terminals will serve as the point of creation for all marijuana and marijuana products inventory records and manifests.

The Company's Management is responsible for continually auditing and revising the Company's recordkeeping policies and procedures to reduce the risk of incidental disclosure and loss while maintaining efficiency and streamlining operations where possible. Management will undertake a monthly review of all facility business records to ensure that they are complete and up to date. Additionally, Management will meet on a quarterly basis to review the recordkeeping policies and procedures and assess those policies in terms of general efficiency and ability to provide decision makers with appropriate information. Any changes or adaptations to recordkeeping policies and procedures will be recorded, published, and implemented after each quarterly meeting. On an annual basis, the COO will conduct a thorough review and revision of the Company's record keeping policies and procedures, and incorporate all changes and additions made during the year.

Operations Record Storage

Physical Records Maintenance:

All physical documents will be stored in a locked, fireproof filing cabinets in the Record Storage Room unless they are currently in use. Lockable, fireproof filing cabinets in the Record Storage Room are home to physical records and other documents required to be kept at the facility. These records include operating plans, financial records, inventory records, employment records, training records, security-related information, and other informational documents. All newly-created physical records stored in the Records Storage Room will be scanned and uploaded onto the facility's digital storage server by the COO on a monthly basis to create a redundant electronic backup version of the record. Operational records, upon request from the commission, will be promptly delivered to the commission for inspection of compliance. 935 CMR 500.105(9)(a).

Records and documents stored indefinitely in the Record Storage Room include, but are not limited to:

- The Company's Operating Procedures including all management plans and operating manuals;
- Test results for all products tested by a licensed marijuana testing facility;
- Seed to sale tracking records;

- Inventory Records including purchases, sales, disposal, and other acquisitions or distributions as well as documentation of inventory audits;
- All Transport Manifests, Purchase Orders, Trip Sheets, and other documentation associated with transporting marijuana;
- Security Records includes documentation of alarm events, security inspections, periodic equipment testing, review, etc.;
- Records of all CCC Inspections;
- Human Resources Materials (includes employment records, training materials and attendance records, Staffing Plan, Agent Handbook, and Agent Code of Conduct);
- A personnel record for each marijuana establishment agent. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and shall include, at a minimum, the following:
 - All materials submitted pursuant to 935 CMR 500.030(2)
 - Documentation and verification of references
 - Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
 - Job descriptions for each employee or employment contract which includes duties, authority, responsibilities, qualifications, and supervision
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
 - Documentation of periodic performance evaluations;
 - Records of any disciplinary action taken; and
 - Notice of completed responsible vendor and eight-hour related duty training.
- A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
 - Personnel policies and procedures; and
 - All background check reports obtained in accordance with 935 CMR 500.030.
- Business records, which shall include manual or computerized records of:
 - Assets and liabilities;
 - Monetary transactions;
 - A current Balance Sheet, Statement of Cash Flows, and Income Statement;
 - Records of all transactions conducted by the Company;
 - Other financial records reasonably related to the operations;
 - Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
 - Sales records including the quantity, form, and cost of marijuana products; and
 - Salary and wages paid to each employee, stipend paid to each board member, and 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.

Additionally, the Company will retain the following records for at least three (3) years: 935 CMR 500.105(8)(b)

1. All harvest records including the total weight of each portion of the plant harvested (i.e. flower, trim, leaves, stalk, etc.);
2. A log of all fertilizers, and agricultural chemicals used in cultivation operations;
3. A record of each watering, feeding, pruning, and other cultivation activities;
4. A record of all extraction and processing activities;
5. A record of any damaged or defective or to be disposed marijuana stock;
6. All agent training records, including agent names and a summary of the materials used in training; and
7. A material safety data sheet and a receipt of purchase for all pesticides, fertilizers, and agricultural chemicals used or stored on the facility premises.

Inventory records, upon request from the commission, will be promptly delivered to the commission for inspection of compliance. 935 CMR 500.105(9)(b). Following the potential closure of the establishment, the company shall retain records for a minimum of two (2) years, in the form that it would during fully operational periods.

The Company may use a third-party independent company at an offsite location to create a back-up storage of physical records, if necessary. The offsite storage company would secure records using an advanced security system, and be uniquely equipped with technologically-advanced alarms and sensors, advanced fire protection, and 24/7/365 monitoring to protect all the facility's records. If the Company should close or otherwise cease to operate, all records generated up until the date of closing will be transferred to a secure storage location for at least three (3) years after the cessation of operations. If this should occur, the CCC will be notified of the final storage location of these records.

Electronic Records Maintenance:

In addition to physical copies of the Company records, electronic records are stored on the hard disc storage device in the Security Office. Furthermore, backup copies of these records are stored on a secure, cloud-based server that is only accessible to authorized Company agents and CCC representatives. This method of storage provides the maximum level of security and compliance with all state and federal document storage and confidentiality rules and ensures that all records are adequately protected from loss, damage, or unauthorized use. In the event that the facility's electronic recordkeeping system loses power or otherwise goes offline, the Company will maintain manual records detailing all inventory tracking activities and will immediately enter those records in the electronic recordkeeping system once access is restored.

Software for Cannabis Tracking System Recordkeeping:

The Company will use the METRC inventory tracking system for all inventory tracking requirements and for the creation of all inventory-related records. The company shall

additionally utilize a tracking software, other than METRC, as a back-up software should METRC face technical difficulties in order to create a redundancy for crucial recordkeeping processes. The tracking systems will be integrated with the facility's LAN and network infrastructure to allow for real time inventory tracking and record creation. All electronic and physical Inventory Logs, inventory information, and other data that the Company collects through its inventory tracking activities will be maintained in electronic format and made available to the CCC and law enforcement upon request. Electronic inventory records will be maintained for the duration of operations and for three (3) years after permanently closing. Physical inventory records generated by a tracking software will be stored in a locked, fireproof filing cabinet in the facility's Records Storage Room. Physical receipts of purchases, sales, and other dispositions, including any sampling conducted by CCC representatives, will be maintained on-site. The Company will retain such receipts for the duration of business operations and at least three (3) years after operations cease.

Product Tracking

Electronic Tracking System Requirements.

The Applicant will implement the electronic tracking system approved by the CCC, Metrc, to log, verify, and monitor receipt, use and sale of seeds, immature plants or mature plants, the funds received by a grower processor for the sale of marijuana to another marijuana organization, the disposal of marijuana waste and the recall of defective marijuana. 935 CMR 500.105(8)(c)(1); 935 CMR 500.105(8)(e). In addition to Metrc, as an added measure of security to prevent diversion and quality control, Applicant will utilize a secondary electronic tracking system as a backup system, to ensure all records and controls are maintained in the event of a failure of either system.

Applicant shall report in the tracking system the disposition, weight and type of seeds, immature and mature plants, processed marijuana products ready for sale on the licensed Facility and any transfers associated with commercial cannabis activity between licensees. Additionally, Applicant will track the number of damaged, defective, expired, or contaminated seeds, immature plants, mature plants, and products awaiting disposal. Seed-to-sale records, upon request from the commission, will be promptly delivered to the commission for inspection of compliance. 935 CMR 500.105(9)(c).

The Applicant will implement the following policies and procedures for the safe and accurate tracking of all inventory:

- 1) Ensure the accuracy and completeness of all data and information entered into the tracking system with monthly inventory and inventory reviews, and annual comprehensive inventory and inventory reviews on all products at the Facility; 935 CMR 500.105(8)(c)(1); 935 CMR 500.105(8)(c)(2); 935 CMR 500.105(8)(c)(3)

- 2) The Applicant shall use the tracking system for recording all applicable commercial cannabis cultivation activities. The Applicant shall:
 - a) Establish an account in the tracking system prior to engaging in any commercial cannabis activities associated with its license and maintain an active account while licensed;
 - b) Designate and train a management-level employee to act as the Tracking System Administrator. The Applicant may authorize additional administrators as necessary;
 - c) Require designated administrators to complete initial training prior to accessing the system and participate in ongoing training as required by the CCC;
 - d) Designate tracking system users, as needed, and require the designated users to be trained by the Applicant's Tracking System Administrator in the proper and lawful use of the tracking system before the designated users are permitted to access the tracking system;
 - e) Require the designated administrator to maintain an accurate and complete list of all authorized tracking system users. Require further that each inventory shall include the date of inventory, a summary of findings, the identities of all individuals that took inventory accompanied by their signature and affirmation of the validity of the logs as well as other requirements. 935 CMR 500.105(8)(d). Additionally, the administrator must update the list immediately when changes occur, and transcribe any oral inventory into written form into the inventory logs; 935 CMR 500.105(8)(c)(4).
 - f) Cancel any tracking system administrator or user from an associated tracking system account if that individual is no longer a licensee representative or the administrator; and
 - g) Correct any data that is entered into the tracking system in error within 24 hours of discovery of the error.
- 3) Termination. Attempts to falsify or misrepresent data or information entered into the tracking system is a violation of the Applicant's policies punishable by termination of employment.
- 4) Loss of Access. If the Applicant loses access to the tracking system for any reason, the Applicant shall prepare and maintain comprehensive records detailing all inventory activities that were conducted during the loss of access. The secondary electronic tracking system shall mirror Metrc's data and shall be available and capable of replacing the main system in the event of a temporary failure.

- a) Once access to the tracking system is restored, all inventory tracking activities that occurred during the loss of access shall be entered into the tracking system within 48 hours;
- b) The Applicant shall document when access to the tracking system was lost and when it was restored;
- c) The Applicant shall not transport any cannabis or cannabis products to other licensed Facility until such time as access is restored and all information is recorded into the tracking system.

Tracking System.

Metrc has been chosen as the Electronic Tracking System provider for the State of Massachusetts. Accordingly, the Applicant will be selecting Metrc to be its provider of seed to sale tracking. Metrc provides effective cutting-edge technology solutions for the emerging legal cannabis industry that will:

- 1) Prevent product theft;
- 2) Assist business owners with running their cultivating, and packaging more profitably and;
- 3) Better assist with legal compliance; and
- 4) Protect client data.

METRC.

METRC has both an industry side and regulatory side. The industry side is used to report the required events and information while the regulatory side is used for enforcement and compliance monitoring. METRC has all the features to be the primary tool for fighting against diversion and illegal use and purchase of cannabis.

System Reporting Requirements.

The Applicant will have in place the following system reporting requirements:

- 1) The Applicant shall report through the tracking system, any and all transfers of cannabis or cannabis products to another licensed entity;
- 2) The Applicant shall notify the CCC at least twenty-four (24) hours prior to entering a change in the disposition of cannabis plants on the licensed Facility or transfer of any cannabis or cannabis products to another licensed Facility;
- 3) The Applicant shall report the information described in the transportation section of this application for the transfer of cannabis or cannabis products to another licensed Marijuana Establishment.

Management and Disposal of Cannabis.

Inventory destruction is initiated through the system requiring documentation of destruction purpose and/or approved method as well as the employee performing the action. Although the inventory can be adjusted or voided, at no time is any data ever fully deleted as METRC maintains a log of every action, including adjustments and voids, so that the entire history of the system may be reconstructed. The availability and reportability of the system data enable the said entity to produce any information necessary for the CCC during an inspection or at the CCC's request.

Product Recall Records Features.

In the event of a recall, specified users can quickly pull reports of all products and transactions associated with a specific plant(s), batch or strain. Within the system, the Applicant will be able to quickly and easily find the remaining product and the licensees it has been delivered to.

Sales Records.

Sales records and invoices must be created and maintained in the point of sale system for at least seven (7) years after termination of operations. The COO will oversee the accuracy and maintenance of all sales records. Sales records will be compliant with all the Applicant's recordkeeping policies and procedures, CCC regulations, and be made available to the CCC for any tracking purposes:

- 1) The date and time of each sale to a Licensee;
- 2) The method of distribution;
- 3) The quantity, form, and price of cannabis;
- 4) The consideration given by Licensee; and
- 5) The name, address, and identification number of the Licensee.

Record Destruction:

The COO is responsible for identifying which physical records will be destroyed and for overseeing their destruction. Duplicate documents printed for use in operations, documents with incorrect information, and other unnecessary documents are examples of documents that can and should be destroyed in order to limit the amount of paper records in each file. Destruction of all physical customer, affiliate, and supplier records and other business documents will be done by Iron Mountain as part of the Company's service package. Any documents to be shredded will first be scanned and added to the facility's digital storage server to ensure that there is a full and complete record of all information held by the Company at all times.

The Company's hard-disk storage will utilize Document Management Software ("DMS") that features an automated record-deletion feature that will give the Company the ability to retain records for durations dictated by CCC rules. All digital security, inventory, business, and financial records and data will be retained on the hard-disk server for three (3) years, after which time records will be automatically deleted from the server by the DMS software deletion feature. Similarly, all video surveillance footage will be retained for thirty (30) days before being automatically deleted by the DMS. The DMS record deletion feature can be changed to allow for longer retention periods as CCC rules change or as the need to do so is identified by the COO. The system will automatically notify the CEO, CSO and COO fifteen (15) days before deletion takes place to confirm the decision.

Review and Discipline

The COO along with the help of an independent third-party expert will audit and assess the potential risks and vulnerabilities of the facility's electronic and physical recordkeeping capabilities and will generate a Records Access Review Report on a quarterly basis. The purpose of this report is to audit and revise the Company's recordkeeping policies and procedures in order to reduce the risk of incidental disclosure and loss of facility information while maintaining or increasing operational efficiency. The Company will also use quarterly Records Access Review Reports to identify unauthorized or abnormal activity by agents or other parties accessing facility information.

The COO is responsible for disciplining agents who intentionally or negligently disclose facility information. Agents who fail to comply with the Company's recordkeeping requirements will be suspended without pay for one (1) week after the first offense and terminated after the second barring exceptional circumstances. The CEO, with the advice of the COO, and CSO, has total discretion as it relates to agent termination after any breach of the Company's recordkeeping policies and procedures have occurred.

Financial Recordkeeping

The Company is committed to maintaining a fully transparent set of financial records for all activities conducted during cultivation and facility operations. The company's financial recordkeeping can be described through policies and procedures for all business recordkeeping. As such, the following is the financial recordkeeping related portion excerpted from a more comprehensive recordkeeping policy, the latter of which has been uploaded separately.

All facility records and recordkeeping activities are the responsibility of the Company's Management, including implementing, maintaining, and revising the Company's recordkeeping policies and procedures through continual discussion and review of their effectiveness in business operations. The facility's recordkeeping policies and infrastructure shall include, at least, METRC inventory tracking software, Backup Track-and-Trace software, a Record Storage Room, an ENVR and hard-disk storage device, and a secure, cloud-based server for redundant backups of all electronic records.

Recordkeeping Policy Overview

The Company's recordkeeping policies are intended to promote standardized recordkeeping that discourages diversion, unlawful release of information, and other negative activity. All policies and procedures related to recordkeeping have been designed to ensure the confidentiality, integrity, and security of all current and retained recorded information.

The Company will install a recordkeeping network infrastructure that is designed to automatically create, protect, store, and backup all records, recordings, and data generated on the facility premises. Operations data, security data, and other records will be automatically backed up on the facility's encrypted, cloud-based storage server on a daily basis to prevent any loss of data. The Company's electronic records can only be accessed by members of Management and other authorized agents, and records will not be shared with third parties except in compliance with CCC rules and applicable laws and regulations. Each time recorded data is accessed, the activity will be tracked and tied to an agent using the agent's specific login credentials. The Company will incorporate digital recordkeeping automation through the use of Document Management Software ("DMS"), which increases efficiency and reduces discrepancies that may occur through agent physical recordkeeping procedures.

Most physical copies of the Company's records will be stored in a locked, fireproof file cabinets in the Record Storage Room. Physical records used in daily operations, such as the Visitor Logbook, will be stored in a secure, lockable container in the operations area in which they are used. Once these operations records are completed, they will be transferred to the Record Storage Room and stored in one of the filing cabinets. As part of the Company's recordkeeping policies, all physical copies of records will be scanned and uploaded onto the facility's digital storage system by the COO at monthly intervals.

The creation and capture of the Company's records, documents, and data will be automatically initiated by the many computer terminals and software used at the facility as well as on physical log sheets or booklets. Computer terminals, stationed at the Reception Desk, Administration Office, and Security Office, will be the point of data and document creation for all business, security, and financial records, facility appointment schedules, digital communication including communication with CCC representatives, and vendor and affiliate information. The Company's METRC inventory control system terminals shall be stationed in the vault area, and other storage areas, the cultivation areas, dry, cure, and trim rooms, as well as in the packaging, labeling, and shipping areas. These terminals will serve as the point of creation for all marijuana and marijuana products inventory records and manifests.

The Company's Management is responsible for continually auditing and revising the Company's recordkeeping policies and procedures to reduce the risk of incidental disclosure and loss while maintaining efficiency and streamlining operations where possible. Management will undertake a monthly review of all facility business records to ensure that they are complete and up to date. Additionally, Management will meet on a quarterly basis to review the recordkeeping policies and procedures and assess those policies in terms of general efficiency and ability to provide decision makers with appropriate information. Any changes or adaptations to recordkeeping policies and procedures will be recorded, published, and implemented after each quarterly meeting. On an annual basis, the COO will conduct a thorough review and revision of the Company's record keeping policies and procedures, and incorporate all changes and additions made during the year.

Operations Record Storage

Physical Records Maintenance:

All physical documents will be stored in a locked, fireproof filing cabinets in the Record Storage Room unless they are currently in use. Lockable, fireproof filing cabinets in the Record Storage Room are home to physical records and other documents required to be kept at the facility. These records include operating plans, financial records, inventory records, employment records, training records, security-related information, and other informational documents. All newly-created physical records stored in the Records Storage Room will be scanned and uploaded onto the facility's digital storage server by the COO on a monthly basis to create a redundant electronic backup version of the record. Operational records, upon request from the commission, will be promptly delivered to the commission for inspection of compliance. 935 CMR 500.105(9)(a).

Records and documents stored indefinitely in the Record Storage Room include, but are not limited to:

- The Company's Operating Procedures including all management plans and operating manuals;

- Test results for all products tested by a licensed marijuana testing facility;
- Seed to sale tracking records;
- Inventory Records including purchases, sales, disposal, and other acquisitions or distributions as well as documentation of inventory audits;
- All Transport Manifests, Purchase Orders, Trip Sheets, and other documentation associated with transporting marijuana;
- Security Records includes documentation of alarm events, security inspections, periodic equipment testing, review, etc.;
- Records of all CCC Inspections;
- Human Resources Materials (includes employment records, training materials and attendance records, Staffing Plan, Agent Handbook, and Agent Code of Conduct);
- A personnel record for each marijuana establishment agent. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and shall include, at a minimum, the following:
 - All materials submitted pursuant to 935 CMR 500.030(2)
 - Documentation and verification of references
 - Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
 - Job descriptions for each employee or employment contract which includes duties, authority, responsibilities, qualifications, and supervision
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
 - Documentation of periodic performance evaluations;
 - Records of any disciplinary action taken; and
 - Notice of completed responsible vendor and eight-hour related duty training.
- A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
 - Personnel policies and procedures; and
 - All background check reports obtained in accordance with 935 CMR 500.030.
- Business records, which shall include manual or computerized records of:
 - Assets and liabilities;
 - Monetary transactions;
 - A current Balance Sheet, Statement of Cash Flows, and Income Statement;
 - Records of all transactions conducted by the Company;
 - Other financial records reasonably related to the operations;
 - Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
 - Sales records including the quantity, form, and cost of marijuana products; and
 - Salary and wages paid to each employee, stipend paid to each board member, and 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.

Additionally, the Company will retain the following records for at least three (3) years: 935 CMR 500.105(8)(b)

1. All harvest records including the total weight of each portion of the plant harvested (i.e. flower, trim, leaves, stalk, etc.);
2. A log of all fertilizers, and agricultural chemicals used in cultivation operations;
3. A record of each watering, feeding, pruning, and other cultivation activities;
4. A record of all extraction and processing activities;
5. A record of any damaged or defective or to be disposed marijuana stock;
6. All agent training records, including agent names and a summary of the materials used in training; and
7. A material safety data sheet and a receipt of purchase for all pesticides, fertilizers, and agricultural chemicals used or stored on the facility premises.

Inventory records, upon request from the commission, will be promptly delivered to the commission for inspection of compliance. 935 CMR 500.105(9)(b). Following the potential closure of the establishment, the company shall retain records for a minimum of two (2) years, in the form that it would during fully operational periods.

The Company may use a third-party independent company at an offsite location to create a back-up storage of physical records, if necessary. The offsite storage company would secure records using an advanced security system, and be uniquely equipped with technologically-advanced alarms and sensors, advanced fire protection, and 24/7/365 monitoring to protect all the facility's records. If the Company should close or otherwise cease to operate, all records generated up until the date of closing will be transferred to a secure storage location for at least three (3) years after the cessation of operations. If this should occur, the CCC will be notified of the final storage location of these records.

Electronic Records Maintenance:

In addition to physical copies of the Company records, electronic records are stored on the hard disc storage device in the Security Office. Furthermore, backup copies of these records are stored on a secure, cloud-based server that is only accessible to authorized Company agents and CCC representatives. This method of storage provides the maximum level of security and compliance with all state and federal document storage and confidentiality rules and ensures that all records are adequately protected from loss, damage, or unauthorized use. In the event that the facility's electronic recordkeeping system loses power or otherwise goes offline, the Company will maintain manual records detailing all inventory tracking activities and will immediately enter those records in the electronic recordkeeping system once access is restored.

Review and Discipline

The COO will assess the potential risks and vulnerabilities of the facility's electronic and physical recordkeeping capabilities and will generate a Records Access Review Report on a quarterly basis. The purpose of this report is to audit and revise the Company's recordkeeping policies and procedures in order to reduce the risk of incidental disclosure and loss of facility information while maintaining or increasing operational efficiency. The Company will also use quarterly Records Access Review Reports to identify unauthorized or abnormal activity by agents or other parties accessing facility information.

The COO is responsible for disciplining agents who intentionally or negligently disclose facility information. Agents who fail to comply with the Company's recordkeeping requirements will be suspended without pay for one (1) week after the first offense and terminated after the second barring exceptional circumstances. The CEO, with the advice of the COO, CSO, and the Human Resources Director ("HRD"), has total discretion as it relates to agent termination after any breach of the Company's recordkeeping policies and procedures have occurred.

Personnel and Background Checks

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Hiring Process

The Company is committed to recruiting and hiring local top-quality agents whose background and experience match each position’s requirements per the job description. The Company is also establishing itself as a veteran-centric company committed to creating jobs, offering training, and leveraging the skills possessed by veterans who have served the country in innumerable ways.

The Company will not consider applicants with industry experience unless such experience gained by working in legalized organizations. All candidates will submit to an extensive background check which includes: criminal background investigations, obtaining reference checks on previous employment, verifying educational history, conducting drug testing, verifying eligibility for lawful employment in the U.S. and obtaining motor vehicle records when applicable. Any applicant’s refusal to submit to drug screening will immediately eliminate their candidacy.

Eligibility: All agents or volunteers will be registered with the CCC before they can work or volunteer for the Company. Company will not hire agents or engage volunteers that have a criminal history or are under the age of 21. All agents and volunteers will submit to a thorough background check. Any volunteer or agent unwilling to participate in the background check process will be eliminated from the hiring process.

Records: Each agent’s personal records will be stored both electronically and in paper form. Access to these records will be limited to authorized personnel only. Physical copies will be stored in the Record Storage Room. Electronic copies will be stored electronically on a password protected cloud-based server. Company is committed to maintaining a transparent and fully accountable set of related Agent records for internal and external audits, and for review

by CCC at all times. All records of agent training and certifications will also be maintained by HRD in the agent's personnel file. Agent application materials including their resume, list of professional references, copy of Commission issued badge, proof of age (21+) as well as related Background Check materials will also be stored within the agent's personnel file.

Background Checks

Company believes that hiring qualified individuals contribute to the Company's overall strategic success. Background checks help Management obtain the information necessary to determine an applicant's overall employability and to ensure the protection of Company's physical property, proprietary information, and other assets. Background checks serve as an important part of the selection process and the information collected will help Company promote a safe work environment for current and future agents and customers. In addition, Massachusetts law requires that all owners, managers, agents, and volunteers of Company successfully pass background screening. Company will comply with all applicable federal, state and local laws, including fair employment practices and equal employment opportunity, when conducting background checks.

Company will conduct extensive, more specified, background checks on all job applicants applying for sensitive positions. These include positions involving security and financial responsibilities as well as other positions determined by Company's Senior Management to be sensitive. Company will use a third party agency to conduct a background check to verify the accuracy of the information provided by applicants during the selection process. Background checks will be conducted by the Director of Security or an approved vendor, and the report will be sent directly to the CCC.

Information collected during a background check will include past employment, education, character, and finances. Company will ensure that all background checks are conducted in compliance with all applicable federal and state statutes, such as the Fair Credit Reporting Act ("FCRA") and the Americans with Disabilities Act. The HRD will be primarily responsible for the background check process.

Company will ensure that all information obtained from the background check process will only be used as part of the employment process and will be kept strictly confidential. Company will maintain a log that will include the position the applicant applies for, their name and the date of the background check. Only Senior Management and other authorized individuals within the Company will have access to this information. Company will comply with all federal and state laws regarding the collection, storing and disposal of applicant information.

In addition to formal criminal background checks, Company will also:

- Require three professional references from each candidate to ensure that the candidate's professional experience aligns with the candidate's presented experience;
- Require a formal resume/CV from each applicant to review extensively and to use during the reference check process;

- Verify the candidate's educational history;
- Verify the candidate's eligibility for lawful employment in the U.S.;
- Obtain motor vehicle records, where applicable; and
- Perform a credit check, if applicable to the candidate's position within the Company.

Agent ID Cards:

All agents of the Company are required to have and properly display an agent identification badge at all times while on the premises, and new hires may not begin working until they obtain an agent identification badge. Company agents are not permitted to transfer, sell, trade, lend, or give up ownership of their identification badge, and doing so is cause for termination of employment. Every agent will be provided with a lanyard when they are hired so they can wear their identification badges around their necks while on the facility premises. The HRD is responsible for helping agents with any identification badge related issues. If an agent loses their issued identification badge, they will be expected to notify the HRD immediately. Until a replacement badge is issued, such agent may not return to work at the facility premises.

Company Hiring Process

Company is committed to recruiting and hiring local, qualified agents whose background and experience match each position's requirements per the job description. Company is also establishing itself as a veteran's-centric company committed to creating jobs, offering training, and leveraging the skills possessed by veterans who have served the country.

Company will not consider applicants with industry experience unless such experience gained by working in legalized organizations. All candidates will submit to an extensive background check which includes: criminal background investigations, obtaining reference checks on previous employment, verifying educational history, conducting drug testing, verifying eligibility for lawful employment in the U.S. and obtaining motor vehicle records when applicable. Any applicant's refusal to submit to drug screening will immediately eliminate their candidacy.

The following processes have been developed to streamline Company's hiring process:

Newly Created Positions: When it is determined that a new position is needed, it is important to:

- Consider strategic goals for the business
- Conduct an analysis of core competencies, skills missing and those which may be needed in the future; and
- Conduct a job analysis for new positions.

Replacement of Current Positions: When attrition occurs, replacing the role is typically the next logical step to take. Before advertising the position however, the Company considers the following:

- As with a newly created position, it may be helpful to conduct a job analysis in order to tailor the position to what is currently required and to ensure proper classification;

- Review the role and decide if there are changes required as certain tasks and the new person may not perform responsibilities performed by the previous person; and
- Carefully evaluate any changes needed for the following:
 - Skill level required to perform these tasks; determine appropriate classifications
 - Tasks carried out by the previous agent;

Developing a Strong Candidate Pool: A job description is the core of a successful recruitment process as interview questions, interview evaluations, and reference checks will be developed from this description.

A well-written job description:

- Clearly articulates responsibilities and qualifications to attract the best suited candidates
- Improves retention as turnover is highest with newly hired agents. Agents tend to be dissatisfied when they are performing duties they were not originally hired to perform;
- Provides an opportunity to clearly articulate the value proposition for the role;
- Optimizes search engine results by ensuring job postings rank highly in candidate online search results;
- Serves as documentation to help prevent, or defend against, discrimination complaints by providing written evidence that employment decisions were based on rational business needs;
- Identifies tasks, workflow and accountability, enabling the ability to plan how it will operate a grow;
- Assists in establishing performance objectives;
- A proper position overview is used for career planning and training by providing clear distinctions between levels of responsibilities and competencies required. A well-written job description can be used as a benchmark to ensure internal and external equity

Hiring Action Steps: A hiring committee will be established and will be responsible for the following:

- Determining availability of funds for new position for current and next fiscal year;
- Confirming availability of funds with Management;
- Developing relevant hiring criteria such as strong communication skills, problem-solving skills, or specific training with gardening etc.;
- Develop a job description by revisiting prior descriptions and revising in light of current needs;
- Reviewing draft job descriptions with incumbent, when applicable;
- Reviewing and identifying new tasks;
- Reviewing and identifying educational/training requirements;
- Reviewing and identifying experience/skills;
- Establishing preferential criteria for diverse applicants;
- Sending final draft job descriptions to the HRD and Senior Management;
- Obtaining necessary documentation

Once job funding and description is approved, the HRD will internally post an employment opportunity to Company staff for a minimum of five days. If there are no internal responses received after five days, or if the internal applicants are not suitable, the hiring supervisor will consult with the HRD to determine appropriate means of advertising externally.

Upon receiving qualified applicants, the HRD will:

- Conduct interviews;
- Meet to consider interviewees and assess which best met established job criteria; and
- Check references of final candidate prior to making offer

Agent Training

The Company's training program has been developed into three training categories: core training, including training by a certified Responsible Vendor Training program under 935 CMR 500.105(2)(b), functional training, and continuing education training, which includes shadowing and on-the-job training for specific job requirements. Prior to the training start date, each agent will undergo a needs and skills analysis to determine the agent's level of experience and competence for their assigned job functions. Functional training is designed to be malleable and take an agent's skills and competencies into account when designing the training program, tailoring the roles and responsibilities to each agent's job functions; agents whose responsibilities involve interacting with a Seed-to-Sale SOR will receive training specific to that duty. All agents shall be trained prior to performing any job functions. All training will be monitored and documented to ensure that all agents are meeting their training objectives and that the content of this training will be made available to the Commission if requested. 935 CMR 500.105(2)(a). Prior to licensure, the company shall require all current owners, managers, and employees to the Responsible Vendor Training program, in addition to the in facility training described below. 935 CMR 500.105(2)(b)(1).

Core Training: The Company's core training begins with the Company's initial agent onboarding training process. Each new agent will participate in orientation within 5 days of initial hire. In this training, each agent will be provided with a copy of the Agent Handbook; Policy and Procedures; Safety Plan; HACCP Compliance Policies; Agent Code of Conduct; an overview of State and Federal marijuana laws and regulations; and a written explanation of all expectations to maintain a professional work environment. Onboarding training process explicitly includes training on the Commission's rules and regulations, the policies and procedures found in the Agent Handbook, and the Company's mission and guiding principles. This training program is supplement the responsible vendor training, and to create a corporate culture grounded in the compliance of state law and Company's values that will create an engaging and rewarding work environment for all agents. All owners, managers, and employees must attend a certified Responsible Vendor training program, prior to performing any job functions and within 90 days of hire, and annually thereafter. 935 CMR 500.105(2)(b)(2); 935 CMR 500.105(2)(b)(3).

Functional Training: Every agent and any volunteers will be trained in specific job functions that will be crucial to the performance of their duties by their immediate supervisor and the agent's co-workers. Functional training stresses compliant, ethical behavior as a part of the standard operations in all parts of the company.

As part of functional job training, the new agent will be paired with an experienced co-worker and a member of Management who will guide the new agent through the training process. The member of Management will be responsible for setting training goals and timelines for each aspect of the agent's functional training while the experienced co-worker will be responsible for physically completing the training process with the new agent. By requiring agents to conduct the new agent's training, Management hopes to periodically refresh every agent's knowledge base while building cohesion among all staff.

Continuing Education Training: The Company requires all agents to undergo fifteen (15) hours of continuing training each year. Management will conduct quarterly continuing training sessions at the production facility to provide agents with an opportunity to meet these requirements. In addition to this, all owners, managers, and employees shall complete a Responsible Vendor Training program annually to maintain status as a Marijuana Establishment Agent. Management encourages agents to maintain a Personal Development Plan and actively work towards their professional development. The Company uses performance reviews as a tool to determine pay increases, promotions and discipline. The performance review is used to analyze the agent's work performance and to evaluate all strengths, areas for improvement, and job goals for the next review period. New agents will be required to undergo performance review on a quarterly basis for the first year of employment. All Company agents are required to participate in an annual performance review with their immediate supervisor and members of Management.

Training Assessment: Each training (Core, Functional or Continuing) will require agents to complete a post-training assessment. These assessments will allow agents to demonstrate their knowledge by passing a test with a mixture of multiple choice and written questions. No fewer than 20 exam questions will be derived from each training section. In the event that an agent does not answer all questions correctly, the agent will review the section from which the question(s) were derived and answer five subsequent questions on that section. Agents will not be able to work within the facility if they are unable to pass job-specific training assessments.

Agent Workplace Expectations

The Company expects every agent to act in a professional manner. Satisfactory performance of job duties and responsibilities is key to this expectation. Agents should attempt to achieve their job objectives, and act with diligence and consideration at all times. Poor job performance will result in disciplinary action, up to and including termination.

Workweek and Business Hours

The Company's business hours are 9:00 am to 7:00 pm. The normal shift of eight (8) hours and includes the appropriate break times as outlined by the state and federal labor laws.

Administrative and support staff are expected to work normal business hours in order to ensure smooth business operations. Agents may arrange alternate work schedules and locations with the approval of their manager.

Work Attendance

General Attendance

An agent's working hours may vary depending on work location and job responsibilities.

Managers will provide agents with their work schedule. In an agent has any questions regarding their work schedule, the agent should contact their manager.

The Company does not tolerate absenteeism without excuse. Agents who know they will be late to, or absent from work should notify a supervisor in advance, or as soon as practicable in the event of an emergency. Agents who need to leave early, for whatever reason, should inform a supervisor before departure. Unauthorized departures could result in disciplinary action and chronic absenteeism will result in disciplinary action up to and including termination.

Tardiness

Agents are expected to arrive on time and ready for work. An agent who arrives more than five (10) minutes after their scheduled arrival time will be considered tardy. The Company recognizes that the world is a very unpredictable place; regardless, excessive tardiness is prohibited, and may be subject to disciplinary action. If an Agent knows they will be late they should call in to inform the appropriate manager or supervisor of their situation and their estimated time of arrival at work.

Breaks

When working conditions permit, and pending a manager's approval, agents are entitled to one fifteen-minute break for every three (3) hours worked. Agents working for longer than six (6) hours are entitled to a thirty (30) minute break for meals.

Dress Code

It is important for all agents to project a professional image while at work by being dressed appropriately. Company agents are expected to be neat, clean and well-groomed while on the job. Clothing must be consistent with the standards for a business environment and should be appropriate to the type of work being performed.

The Company is confident that agents will use judgment and discretion regarding attire and appearance. Management reserves the right to determine appropriateness in specific instances. Any agent who is deemed to be inappropriately dressed will be verbally warned or sent home to change. Continued disregard of this policy will be cause for disciplinary action and result in termination.

As part of the company's training and operational policies there will be certain types of clothing and accessories that will be prohibited in certain working areas in order to protect the staff and preserve product quality.

Drug and Alcohol Free Workplace Policy

Purpose

The Company is committed to protecting the safety, health and wellbeing of all agents and consumers and caregivers in our workplace. Management recognizes that drug and alcohol abuse pose a significant threat to these goals. Agents under the influence of drugs and alcohol can cause injury to themselves and others. For these reasons, the Company has established a drug-free workplace program that balances respect for individuals with the need to maintain an alcohol and drug-free environment.

This policy outlines the practice and procedure designed to correct instances of identified alcohol and drug use in the workplace. It is every agent's responsibility to take reasonable care of the health and safety of others in the workplace and ensure that their performance and actions are not impeded by the use of drugs or alcohol. If an agent suspects that any co-worker is under the influence of drugs or alcohol, it is their responsibility to communicate this to the HRD. This policy applies to all agents and all applicants for employment of the Company.

Scope and Applicability

The drug and alcohol free workplace policy covers any individual who conducts business for the Company, is applying for a position, or is conducting business on the Company's property. The policy includes, but is not limited to the Senior Management, other managers, team leaders, full-time agents, part-time agents, off-site agents, interns, applicants, and volunteers. The Company's drug and alcohol free workplace policy applies whenever anyone is representing or conducting business for the organization. Therefore, this policy applies during all working hours, whenever conducting business or representing the organization, while on call, paid standby, while on Company property, and at company-sponsored events.

Work Rules

Agents are required to report to work fit for duty and free of any adverse effects of drugs or alcohol. This policy does not prohibit agents from the lawful use and possession of prescribed medications. However, agents must consult with their doctors about the medications' effect on their fitness for duty and ability to work safely and promptly disclose any work restrictions to their supervisor. Agents should not disclose underlying conditions unless directed to do so.

Whenever agents are working, operating any Company vehicle, present on Company premises, or conducting related work off-site, they are prohibited from:

- Using, possessing, buying, selling, manufacturing or dispensing drugs including possession of drug paraphernalia; and

-Being under the influence of alcohol or drugs.

The presence of any detectable amount of any alcohol, drug, or illegal controlled substance in an agent's body while performing Company business or while on Company property is prohibited. Any illegal drugs or drug paraphernalia found on Company property will be turned over to an appropriate law enforcement agency and may result in criminal prosecution.

The Company will not allow any agent to perform their duties while taking prescription drugs that adversely affect the agent's ability to safely and effectively perform their job duties. Agents taking a prescription medication must carry it in the container labeled by a licensed pharmacist or be prepared to produce it if asked.

Inspections

The Company reserves the right to inspect all portions of its premises for drugs, alcohol, and other contraband. All agents, contractors, and visitors may be asked to cooperate in inspections of their persons, work areas, and property that might conceal drugs, alcohol, or other contraband. Agents in possession of contraband or who refuse to cooperate in such inspections are subject to appropriate discipline up to and including discharge.

Drug Testing

Required Testing

The Company retains the right to require the following tests:

1. **Pre-employment:** All applicants must pass a drug test before beginning work or receiving an offer of employment. Refusal to submit to testing will result in disqualification of further employment consideration.
2. **Reasonable Suspicion:** Agents are subject to testing based on observations by a supervisor of apparent workplace use, possession or impairment. The Chief Operating Officer and Human Resources Director must be consulted before testing an agent based on reasonable suspicion.
3. **Post-accident:** Agents are subject to testing when they cause or contribute to accidents that seriously damage a Company vehicle, machinery, equipment, or property or result in an injury to themselves or another agent requiring off-site attention. In any of these instances, the investigation and subsequent testing must take place within two (2) hours following the accident, if reasonably possible.
4. **Follow-up:** Agents who have tested positive, or otherwise violated this policy are subject to discipline up to and including discharge. Depending on the circumstances and the agent's work history, the Company may offer an agent who violates this policy or tests positive the opportunity to return to work on a last-chance basis pursuant to mutually agreeable terms, which could include follow-up drug testing at times and frequencies for a minimum of one (1) year but not more than two (2) years. If the agent does not

complete their rehabilitation program or tests positive after completing the rehabilitation program, they will be subject to immediate termination of employment.

To ensure accuracy and fairness, all testing will be conducted according to Substance Abuse and Mental Health Services Administration (SAMHSA) guidelines where applicable and will include a screening test; a confirmation test; the opportunity for a split sample; and review by the Chief Officer, including the opportunity for agents who test positive to provide a legitimate explanation, such as a physician's prescription, for the positive result; and a documented chain of custody.

The Company's agents or applicants that are registered as marijuana consumers in the State of Massachusetts will face no consequences for testing positive for cannabinoids (THC) upon providing Management with a current consumer registration card. However, it is strictly against the Company's Drug-Free Workplace Policy for any agent to use or be under the influence of any drugs or alcohol, including marijuana, while at work or while representing the Company in any capacity.

The Company will be test for the following substances: Amphetamines, Cannabinoids (THC), Cocaine, Opiates, Phencyclidine (PCP) and Alcohol. Testing for the presence of the metabolites of drugs will be conducted by the analysis of urine while testing for the presence of alcohol will be conducted by analysis of saliva. Agents will be subject to the same consequences of a positive test if they refuse the screening or the test; substitutes the specimen with that from another person or sends a false sample; or will not sign the required forms or refuses to cooperate in the testing process in such a way that prevents completion of the test.

Consequences

One of the goals of the Company's drug-free workplace program is to encourage agents to voluntarily seek help with alcohol or drug problems. If, however, an individual violates the policy, the consequences are serious. The Company has a zero-tolerance policy regarding drug and alcohol use while on the job. The first time an agent tests positive for alcohol or illegal drug use under this policy, the agent will be disciplined up to and including discharge.

Applicants who refuse to cooperate in a drug test or who test positive will not be hired. Agents who refuse to cooperate in required tests or who use, possess, buy, sell, manufacture or dispense an illegal drug in violation of this policy will be terminated. Agents will be paid for time spent in alcohol and drug testing and for the time they are suspended pending the results of the test. After test results are received, a time will be scheduled to discuss the results of the test with the HRD and the agent's supervisor. Should the results prove to be negative, the agent will receive back pay for the time they were suspended.

Confidentiality

Information and records relating to test results, drug and alcohol dependencies, and legitimate explanations provided to Management will be kept confidential to the extent required by law and maintained in secure files separate from normal personnel files.

Agent Assistance

Illegal drug use and alcohol misuse have a number of adverse health and safety consequences. Information about those consequences and sources of help for drug and alcohol problems is available from the HRD, who has been trained to make referrals and assist agents with drug and alcohol related issues.

To support the Company's agents, the drug and alcohol free workplace policy:

- Encourages agents to seek help if they are concerned that they or their family members may have a drug or alcohol problem.
- Encourages agents to utilize the services of qualified professionals in the community to assess the seriousness of suspected drug or alcohol problems and identify appropriate sources of help.

The Company will assist and support agents who voluntarily seek help for such problems before becoming subject to discipline and termination under this or other Company policies. At the discretion of the COO, agents may be allowed to use accrued paid time off, placed on leaves of absence, referred to treatment providers, and otherwise accommodated as required by law. Such agents may be required to document that they are successfully following prescribed treatment and to take and pass follow-up tests if they hold jobs that are safety sensitive or that require driving or if they have violated this policy previously.

Shared Responsibility

A safe and productive drug-free workplace is achieved through cooperation and shared responsibility. Both agents and Management have important roles to play.

Agents are encouraged to:

- Be concerned about working in a safe environment;
- Support fellow workers in seeking help; and
- Report dangerous behavior to their supervisor.

It is the supervisor's responsibility to:

- Inform agents of the drug-free workplace policy;
- Observe agent performance;
- Investigate reports of dangerous practices;
- Document negative changes and problems in performance;
- Counsel agents as to expected performance improvement; and
- Clearly state consequences of policy violations.

Communication

Communicating the Company's drug and alcohol free workplace policy to Management and agents is critical to the program's success. To ensure all agents are aware of their role in supporting the Company's drug and alcohol free workplace program:

- All agents will receive a written copy of the policy;
- The policy will be reviewed in orientation sessions with new agents;
- All agents will receive an update of the policy annually with their paychecks;

- Agent education about the dangers of alcohol and drug use and the availability of help will be provided to all agents; and
- Every supervisor will receive training to help them recognize and manage agents with alcohol and other drug problems.

Human Resources Policies

The Company will only select the most qualified applicants while staffing its operations. Qualifications will vary depending on the job position, but individuals with applicable work experience will be given first priority. The Company will only hire individuals that are twenty-one (21) years of age or older and will not hire applicants that have been convicted of any felony or other criminal behavior that indicates poor moral character. All applicants for employment will be required to submit a list of professional references that will be checked by the HRD during the hiring process. Any prospective agent that has been dismissed by a past employer for theft or similar behavior will not be considered for employment with the Company.

Emergency Prevention and Response

As part of its commitment to the safety of all consumers, caregivers, and agents, the Company will provide all registered agents with the knowledge and training to anticipate, recognize, and react to emergencies that may occur at the Compassion Center. Pre-event preparation, training, and access to readily available information and safety equipment are critical to minimizing consequent injuries and deaths and help to promote overall workforce resilience.

Emergency Anticipation: The first step to handling emergencies at the Compassion Center will be to anticipate the types of emergencies that could arise on the premises. The Company understands that this step is important considering that many marijuana consumers suffer from debilitating, life-threatening illnesses and may need attention while at the Compassion Center. Management will research possible emergencies based on marijuana-qualifying conditions and symptoms such as heart attacks, choking, seizures, and loss of consciousness. Moreover, the Company will ensure that the Compassion Center will be equipped with emergency equipment, such as first aid kits. Additionally, Management will ensure that emergency information is posted throughout the facility so that those tools are easily accessible in the event of an emergency.

Emergency Identification: The next step to handling emergencies at the Compassion Center is to train all agents to identify possible emergencies. Management will partner with the Red Cross of Massachusetts to develop training materials based on previous research, Red Cross workplace emergency standards, and OSHA's Emergency Preparedness and Response Standards. These training materials will include written agent testing to ensure agent information retention and will be included in all agents' onboard training and ongoing, semi-annual training sessions.

Emergency Response: The final step in the Company's emergency response plan is to train all members of management and agents on proper emergency reaction procedures. All

members of Management and specific Compassion Center agents will be Cardiopulmonary Resuscitation (“CPR”) certified with the Red Cross.

In the event of an emergency on the Company’s premises, agents will be trained to adhere to the following procedures:

- If an emergency is reported, dial 9-1-1 and request an ambulance. Provide the following information:
 - Number and location of victim(s)
 - Nature of injury or illness
 - Hazards involved
 - Nearest entrance (emergency access point)
- Alert trained agents (members of the response team) to respond to the victim’s location and bring a first aid kit or AED
- Only trained responders should provide first aid assistance.
- Do not move the victim unless the victim’s location is unsafe.
- Control access to the scene.
- Take “universal precautions” to prevent contact with body fluids and exposure to blood borne pathogens.
- Meet the ambulance at the nearest entrance or emergency access point; direct them to victim(s).

Fire Safety: The Company’s Fire Safety Plan includes the development of policies and procedures, agent training materials, and facility design features as well as proper installation and maintenance of fire safety equipment in order to ensure the safest environment for all individuals at the Compassion Center.

Fire Safety Training: During agent initial intake training, all registered agents and members of Management will be trained on the proper reaction procedures in the event of a fire at the facility. The Company’s fire reaction training will include the location of the Compassion Center’s fire exits and the designated safe meeting place as well as strict procedures for leading and directing consumers, caregivers, and Compassion Center visitors to the designated safe meeting place. All agents will be trained on the location and hands-on operating instruction for the Compassion Center’s many fire extinguishers, and all fire extinguishers will be inspected by a licensed fire extinguisher service company on a quarterly basis to ensure functionality.

Fire Safety Training will address topics including:

- Individual roles and responsibilities;
- Threats, hazards, and protective actions;
- Notification, warning, and communications procedures;
- Means for locating individuals in an emergency;
- Emergency response procedures;
- Evacuation, shelter, and accountability procedures;
- Location and use of common emergency equipment such as fire extinguisher and facility fire alarms; and
- Emergency shutdown procedures

Fire Prevention: The Company’s training materials will include materials to educate agents on proper fire prevention techniques as recommended in OSHA’s Fire Safety in the Workplace

guidance. During initial intake training, the Company will train all agents on fire prevention procedures and techniques to ensure that fire risk is at a minimum. Fire prevention and response training will also be incorporated into semi-annual training sessions as the Company works to perfect policies and procedures. Representatives from the local fire CCC will be asked to provide additional training and insight as further information becomes available.

Fire Response: Management will develop a fire emergency action plan including an easy-to-read map of the facility with a clearly marked path to a designated safe meeting place outside of the facility's building and the location of all facility fire extinguishers. The evacuation plan map will be posted throughout the facility as an easy reference for individuals in the event of a facility fire.

Evacuation Procedures for Uncontrollable Fires: All members of Management and agents will be trained on the following procedures in the event of an uncontrollable fire at the Compassion Center:

- Leave the area of danger. DO NOT stay to fight a large fire;
- Rescue any agent, consumer, caregiver, or visitor in immediate danger;
- On your way out, if it can be done safely, turn off equipment and move any explosive or flammable materials away from possible contact with hot surfaces or other sources of ignition;
- Transmit the fire alarm by pulling the nearest fire alarm box in the facility, notify other personnel at the facility (if possible), and when you have reached a safe location, call 9-1-1
- Leave by means of one of the predetermined evacuation routes for your facility area.
- If possible, confine the fire by closing doors as you leave.
- Evacuate promptly and meet outside the building away from the entrance at a predetermined place.
- Conduct an attendance/person count of workers and make sure all are accounted for; and
- Cooperate with all emergency service personnel and provide any pertinent information upon request.

Fire-fighting Procedures for Controllable Fires: Members of management and agents that are trained to use the proper firefighting equipment will adhere to the following procedures:

- Transmit the fire alarm by pulling the nearest fire alarm box in the facility
- The decision of whether to fight the fire oneself or to wait for fire-fighting help must be made according to the type and size of the fire, its location and the circumstances of the fire.
 - A small fire in a container may be easily snuffed out by the placement of a nonflammable cover across the container opening. A small fire in an area free of other fuels can be extinguished with appropriate available fire extinguishers before calling for help.
- When extinguishing a burning solid, direct the extinguisher discharge at the base of the flame; in the case of burning liquids, direct it at the leading edge. Larger or rapidly growing fires are best left to the Fire CCC.
- To extinguish a minor fire with an extinguisher:
 - Pull Pin

- Aim nozzle at base of fire
- Squeeze handle
- Sweep from side to side

Facility Design and Equipment: Facility fire exits will be clearly marked and well lit, wide enough to accommodate a number of evacuating individuals, unobstructed and clear of debris at all times, and unlikely to expose evacuating individuals to additional hazards. Fire alarm emergency boxes will be stationed throughout the facility so that individuals on the Company's premises are always within reach in case of a fire emergency. Furthermore, the Company will regularly and properly maintain fire safety equipment and systems installed on heat-producing equipment to prevent the accidental ignition of combustible materials. These vital maintenance procedures will be included in the written fire prevention plan taught to all agents and maintained at the facility premises at all times.

Hazard Analysis Critical Control Points: The facility that incorporates HACCP training in order to install a product safety monitoring system which is used to identify and control Illogical, chemical, and physical hazards within the storage, transportation, use, preparation, and sale of goods. The company has adapted this protocol from food safety monitoring systems, by which hazardous risks are minimized or eliminated. These policies incorporate identifying critical control points in the process of cultivation.

Chemical Spill Training: The Company is committed to developing procedures for preventing and properly handling chemical spills on the facility premises. Management will develop and implement a written safety and health program that identifies, evaluates, and controls safety and health hazards and provides emergency response procedures for proper cleanup, storage, and disposal. Such training materials will familiarize agents and members of Management with specific chemicals used at the facility and how to properly prevent harmful chemical spills. The training plan will be based on OSHA's Hazardous Waste Operations and Emergency Response and will include an organizational work plan, site evaluation and control, a site-specific program, information and training program, personal protective equipment program, monitoring, surveillance program, decontamination procedures, and an emergency response program. All Compassion Center agents will be trained on these topics during the onboarding process and ongoing during semi-annual training sessions as new information and procedures become available.

All agents will be trained to clean up simple chemical spills they cause or encounter in the Compassion Center's operations. After cleaning up a spill, the cleaning agent will prepare documentation of the event that includes relaying the specific conditions of the spill and the subsequent cleanup. Such documentation can be used to avoid similar instances in the future. The Company will amend its chemical handling and any other standard operating procedures shown to be deficient in the aftermath of a chemical spill.

All members of Management and agents will be trained on the following chemical spill reaction procedures:

Procedures for minor chemical spills:

- Alert people in the immediate area of spill;
- If spilled material is flammable, turn off ignition and heat sources;
- Open outside windows, if applicable;

- Wear protective equipment, including safety goggles, gloves and long-sleeved lab coat or other Company-provided covering;
- Avoid breathing vapors from spill;
- Confine spill to as small an area as possible;
- Do not wash spill down any facility drains;
- Use appropriate spill kits/sorbents to neutralize corrosives and/or absorb spill.
- Collect contaminated materials and residues and place in a pre-approved chemical-spill container.
- For powdered chemicals carefully sweep the powder to avoid generation of dust or, if appropriate, use moist sorbent pads or wet the powder with a suitable solvent and then wipe with a dry cloth.
- Label and manifest waste and contact on the provided document for proper disposal;
- Clean spill area with water; and
- Report the spill to your immediate supervisor or on-duty Management.

Procedures for a major chemical spill:

- Attend to injured or contaminated persons and remove them from exposure;
- Alert people in the laboratory to evacuate;
- If spilled material is flammable, turn off ignition and heat sources;
- Call 9-1-1 for assistance immediately after you have ensured your own safety;
- Close doors to affected area;
- Report the incident to your immediate supervisor or on-duty Management, and post warnings to keep people from entering the area; and
- Wait for emergency personnel.

Threatening Event

Site Security

- All entryways must be keyed, and controlled from the inside.
- Outside doors must be self-closing.
- Exterior building doors are constructed of metal, and locking areas are tamper resistant.
- Emergency doors must remain closed at all times except in case of emergency.
- Company vehicles are secured and locked inside the parking lot when not in use.
- Loading and unloading docks and doors are closed and secure at all times except when loading and unloading trucks.
- Security is present when loading and unloading trucks.
- Access to facility keys and codes is restricted to assigned personnel.
- Access to utilities such as gas supplies, water supplies and related treating/monitoring equipment, electrical equipment, airflow devices, and storage tanks is restricted to assigned personnel.
- Access to the Warehouse is restricted to assigned personnel. Warehouse doors must be secured and checked after all responsible agents left the site.
- Security is responsible to close and lock the gate of the parking lot after the final shift every weekday and during weekends.

Threatening Event Training

The Company is aware of the possibility that threatening events may occur on the Compassion Center's premises and is committed to training all agents and members of Management on how to respond to such scenarios. Management will compile information and guidelines on crime prevention taken from the United States CCC of Labor's Workplace Violence Program, the CDC's Workplace Violence Prevention Strategies and Research Needs, and the National Crime Prevention Council's Workplace Safety standards. Threatening events training will occur during every agent's initial intake training period. Management will continually research and update threatening events procedures and will partner with local law enforcement to update the Compassion Center's procedures. Changes in threatening events training plans will be communicated to all agents and members of Management during ongoing, semi-annual training sessions as information becomes available.

The Company's Management will be responsible for designing and implementing a personal security training program for agents and members of Management. All agents will be given personal security training through the program developed by Management prior to beginning work at the Compassion Center. Furthermore, all agents will be required to undergo annual, continuing security training on proper procedures for responding to robberies, larcenies, and burglaries on the facility premises. This training will include the basic layout and function of the security system and procedures to follow in the event of a robbery or other incidents, work in concert with agent and Management knowledge to ensure consumers are maximizing the benefits of their marijuana treatments.

Diversity Plan Goals

Diversity means more to a community and business than can be represented on paper. Diversity emboldens all voices; those that might not have otherwise been heard and makes louder those whose words might be otherwise overlooked. Thus, J – B.A.M., INC.'s commitment to diversity is exemplified not only in our diversity action plan or listed internal goals but in every aspect of the company.

Minorities, women, disabled persons, veterans, and LGBTQ+ individuals are provided full and appropriate consideration for employment. The company will identify strategies to help ensure employee selection and retention efforts by encouraging, developing, promoting, counseling, training, and providing opportunities for participation in all company sponsored educational programs. The company will also monitor and uphold the laws and regulations to ensure fairness in equitable employment. Further, the programs described below should allow a more diverse and inclusive population of workers into better careers in this industry.

We aim to provide honest equity by taking exemplary, diverse individuals, who would otherwise not have opportunities to sufficiently advance their careers to meet their potential and provide these individuals with advanced educational and technical training needed to achieve higher level jobs with greater earning potential. There is undoubtedly a discrepancy within the managerial, and higher-level job positions in this industry with regards to diversity. We hope that our actions and internal initiatives will advance the careers of the diverse individuals who are working for the company. Through advanced technical and managerial training provided by the company, we'll enhance our workforce's ability to earn more money and be hired for positions in this industry reserved for highly qualified individuals. We provide equity not only in the number of diverse individuals we hire, moreover we'll prepare them for jobs with greater responsibilities that require a broader skillset. This initiative is not only to promote higher numbers of diverse employment in the industry but to promote better jobs, higher paying jobs for the diverse members of our workforce.

Programs

The progress toward creating a culture that recognizes and values pluralism and differences is built upon the everyday actions of all of our employees. Our initial workforce shall consist of the entire ownership staff; as well as select diverse individuals eager to begin a career in the industry, all of whom shall undergo the state-mandated training as well as J – B.A.M., INC.'s personnel and facility training. We believe this staff can be found in abundance in the Pittsfield area where the company is located.

The first step in accomplishing this diversity plan would be to hire diverse individuals. J – B.A.M., INC. believes that advertising employment opportunities, monthly until demand is met. The company will specifically target diverse candidates through the Office for Career and Technical Education, local academic institutions like Mildred Elley, and local newspapers or bulletins such as the Berkshire Eagle. Documentation of these publications shall be recorded by human resources and provided to the Commission upon request. J – B.A.M., INC. anticipates no problem in sourcing a solid group of diverse applicants.

In addition to seeking eligible employees through advertisements at the vocational schools, and in local publications mentioned above, throughout the ranks of Pittsfield's citizenry, the Company's internal job training programs shall act as a viable path towards its goals of assisting individuals from the enumerated diverse groups to find greater success in the adult use marijuana industry either inside or outside of the company as they advance their career paths.

Our job training program shall provide opportunities otherwise not readily available to many diverse candidates. The inclusion of diversity shall be bedrock in the company's philosophy. The company shall do everything in its power to not discriminate against any individuals, but to provide opportunities to further their careers through management advanced training and mentorships. In order to embrace the diversity in Pittsfield we will aim to specifically include those who fall into the following enumerated categories, as they are currently under-represented in the industry;

- Minorities;
- Women;
- Disabled persons;
- Veterans; and
- LGBTQ+ individuals.

J-B.A.M. understands that high-quality workforce training can help workers get good jobs, climb the ranks inside the company or step out on their own in search of higher paying work in the industry. Our internal advanced job training initiative will train our workforce to handle the managerial and supervisory duties in a cultivation facility. We will educate on the nature of operating a small business and the many challenges in being a business owner. These trainings will better prepare our employees to further their careers by allowing them to take more responsibilities in their current jobs fostering a culture of promotions from within or even opening doors for our diverse team members to other high level, or executive positions in the industry. J-B.A.M. intends to hold job training bi-annually in August and February and may schedule additional individual trainings throughout the year or to meet the demands of the company, industry, and the current job market. All of our diverse employees will be eligible to participate. The company will begin working to provide educational opportunities immediately at licensure.

Measurements

J – B.A.M., INC. intends to employ, advance, and embrace the diverse work force of Pittsfield. Within this broad goal there are sub-goals that the company will fulfill:

- Provide employment opportunities to diverse candidates;
- Working to maintain diversity throughout our management structure;
- Be fair and equitable in assessing applications;
- Tolerate no discrimination against potential and current employees; and
- Provide education and training to help support the careers and career advancement of these diverse individuals.

Our understanding of the qualitative effect of these diversity initiatives shall hopefully be evident by the inclusion and diversity engendered in our business and through the graduates of our job training programs. However, in order to quantitatively show progress in furthering this diversity goal, the company shall grade its efforts by the number of diverse candidates it hires and educates in its job training program. The figures and documents relevant to this assessment shall be made available to the Commission. The company hopes to hire a majority of diverse candidates in its own workforce, roughly 5 to 10 individuals. Specifically, of that number, we aim to hire, 40% women, 30% minorities, 10% disabled persons, 10% Veterans, and 10% LGBTQ+ The Company shall provide opportunities for further education and career training to all employees though aim to specifically support the groups under-represented in the industry especially for higher level, higher paying positions. This aspect of the plan is best measured by

charting the progress of diverse individuals through our own ranks as well as through the ranks of the industry should they seek employment elsewhere. The company will keep track by recording in our human resources files, any advancement or promotions and through our standard employee review process which will be conducted quarterly by managers.

The Company makes the following pledges:

The Company will adhere to the requirements set forth in 935 CMR 500.105(4), providing that the Company shall not engage in any prohibited advertising, branding, marketing, or sponsorship practices. The Company will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.
