Massachusetts Cannabis Control Commission

Public Record Request

Marijuana Product Manufacturer

General Information:

License Number: MP282368

Original Issued Date: 03/13/2026

Issued Date: 03/13/2026

Expiration Date: 03/13/2027

Payment Received: $5000 **Payment Required:** $5000

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Burn Bright LLC

Phone Number: 774-400-5965 **Email Address:** Burnbright2022@gmail.com

Business Address 1: 110 winter st unit 2 **Business Address 2:**

Business City: Holyoke **Business State:** MA **Business Zip Code:** 01043

Mailing Address 1: 146 Adams st apt 2 **Mailing Address 2:**

Mailing City: Fairhaven **Mailing State:** MA **Mailing Zip Code:** 02719

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Veteran-Owned Business

PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

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

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 100 **Percentage Of Control:** 100

Role: Director **Other Role:**

First Name: Matthew **Last Name:** Nelson **Suffix:**

Gender: Male **User Defined Gender:** Male

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

Specify Race or Ethnicity: Portuguese

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY
No records found

CLOSE ASSOCIATES AND MEMBERS
No records found

CAPITAL RESOURCES - INDIVIDUALS
No records found

CAPITAL RESOURCES - ENTITIES
No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES
No records found

DISCLOSURE OF INDIVIDUAL INTERESTS
Individual 1

First Name: Matthew **Last Name:** Nelson **Suffix:**

Marijuana Establishment Name: Burn Bright LLC **Business Type:** Marijuana Cultivator

Marijuana Establishment City: Holyoke **Marijuana Establishment State:** MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 110 winter st

Establishment Address 2: Unit 2

Establishment City: Holyoke **Establishment Zip Code:** 01043

Approximate square footage of the Establishment: 7500 **How many abutters does this property have?:** 1

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

HOST COMMUNITY INFORMATION
Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan to Remain Compliant with Local Zoning	Copy of Plan to remain compliant.pdf	pdf	6878fa45e3b66e9040ca489a	07/17/2025
Executed HCA Waiver	IMG_7194.jpeg	jpeg	689b8a831eca271ddda09c8b	08/12/2025
Executed HCA Waiver	IMG_7193.jpeg	jpeg	689b8a8797444ac6c4bc19ef	08/12/2025
Executed HCA Waiver	IMG_7192.jpeg	jpeg	689b8a8b97444ac6c4bc1a03	08/12/2025
Community Outreach Meeting Documentation	IMG_0087.png	png	68f6bed9afba2bdeda6b14bb	10/20/2025
Community Outreach Meeting Documentation	IMG_0088.png	png	68f6bee1afba2bdeda6b14cf	10/20/2025
Community Outreach Meeting Documentation	IMG_0089.png	png	68f6bee8afba2bdeda6b14e6	10/20/2025

Community Outreach Meeting Documentation	IMG_0090.png	png	68f6beedafba2bdeda6b14fd	10/20/2025
Community Outreach Meeting Documentation	IMG_0091.png	png	68f6bef6afba2bdeda6b1511	10/20/2025
Community Outreach Meeting Documentation	IMG_0092.png	png	68f6bf0aafba2bdeda6b1525	10/20/2025
Community Outreach Meeting Documentation	IMG_0093.png	png	68f6bf10afba2bdeda6b1539	10/20/2025

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.: $

POSITIVE IMPACT PLAN

Positive Impact Plan:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	IMG_8844.jpeg	jpeg	690ce975c1a1ec508a034f8e	11/06/2025
Plan for Positive Impact	IMG_8845.jpeg	jpeg	690ce97ac1a1ec508a034fa2	11/06/2025
Plan for Positive Impact	IMG_8846.jpeg	jpeg	690ce97eaf1485a6ac53955a	11/06/2025
Plan for Positive Impact	IMG_8847.jpeg	jpeg	690ce983c1a1ec508a034ff8	11/06/2025

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Other (specify) **Other Role:** CEO

First Name: Matthew **Last Name:** Nelson **Suffix:**

RMD Association: Not associated with an RMD

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Department of Revenue - Certificate of Good standing	IMG_6564.png	png	68795a9d41aa0138bbbe30fa	07/17/2025
Department of Unemployment Assistance - Certificate of Good standing	IMG_6565.png	png	68795ac2e3b66e9040caf243	07/17/2025
Articles of Organization	IMG_6566.png	png	68795be041aa0138bbbe3359	07/17/2025
Articles of Organization	IMG_6567.png	png	68795be3e3b66e9040caf408	07/17/2025
Articles of Organization	IMG_6568.png	png	68795be7e3b66e9040caf41c	07/17/2025
Bylaws	IMG_6569.png	png	68795d8e41aa0138bbbe3468	07/17/2025
Bylaws	IMG_6570.png	png	68795d91e3b66e9040caf557	07/17/2025
Bylaws	IMG_6571.jpeg	jpeg	68795d96e3b66e9040caf56b	07/17/2025
Secretary of Commonwealth - Certificate of Good Standing	IMG_8765.jpeg	jpeg	68fa47c6d4224865b05c4db4	10/23/2025

Articles of Organization	IMG_8771.png	png	68fa9430d4224865b05cf087	10/23/2025
Articles of Organization	IMG_8772.png	png	68fa9435d4224865b05cf09b	10/23/2025
Articles of Organization	IMG_8773.png	png	68fa943ad4224865b05cf0af	10/23/2025
Articles of Organization	IMG_8774.png	png	68fa9440d4224865b05cf0c6	10/23/2025
Articles of Organization	IMG_8775.png	png	68fa94441cb95ddffb76f2b7	10/23/2025
Articles of Organization	IMG_8776.png	png	68fa94521cb95ddffb76f2eb	10/23/2025

No documents uploaded

Massachusetts Business Identification Number: 001601940

Doing-Business-As Name: Burn Bright LLC

DBA Registration City: Pittsfield

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	IMG_6574.png	png	687960c4e3b66e9040caf74e	07/17/2025
Business Plan	IMG_6573.png	png	687960c841aa0138bbbe37b0	07/17/2025
Business Plan	IMG_6572.png	png	687960cb41aa0138bbbe37c4	07/17/2025
Proposed Timeline	IMG_6575.png	png	687961d841aa0138bbbe397f	07/17/2025
Proposed Timeline	IMG_6576.png	png	687961dbe3b66e9040caf9b1	07/17/2025
Capitalization Table	IMG_6580.png	png	687964a041aa0138bbbe3a47	07/17/2025
Operating Agreement or Articles of Incorporation	IMG_6581.jpeg	jpeg	6879654ae3b66e9040cafcf7	07/17/2025
Operating Agreement or Articles of Incorporation	IMG_6582.jpeg	jpeg	6879654e41aa0138bbbe3bb4	07/17/2025
Operating Agreement or Articles of Incorporation	IMG_6583.jpeg	jpeg	6879655341aa0138bbbe3bc8	07/17/2025
Operating Agreement or Articles of Incorporation	IMG_6584.jpeg	jpeg	6879655741aa0138bbbe3bdc	07/17/2025
Operating Agreement or Articles of Incorporation	IMG_6585.jpeg	jpeg	6879655c41aa0138bbbe3bf0	07/17/2025
Plan for Liability Insurance	Updated Manufacturing Plan for obtaining liability insurance.pdf	pdf	68dc442b366765b777b7185a	09/30/2025

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Types of products Manufactured.	IMG_6586.png	png	6879674941aa0138bbbe3c5a	07/17/2025
Types of products Manufactured.	IMG_6587.png	png	6879674c41aa0138bbbe3c6e	07/17/2025
Types of products Manufactured.	IMG_6588.png	png	6879674fe3b66e9040cafe71	07/17/2025

Types of products Manufactured.	IMG_6589.png	png	6879675341aa0138bbbe3c82	07/17/2025
Types of products Manufactured.	IMG_6590.png	png	6879675641aa0138bbbe3c96	07/17/2025
Types of products Manufactured.	IMG_6591.png	png	6879676841aa0138bbbe3cb2	07/17/2025
Method used to produce products	IMG_6633.png	png	68796a5041aa0138bbbe3ea4	07/17/2025
Method used to produce products	IMG_6632.png	png	68796a54e3b66e9040caff39	07/17/2025
Method used to produce products	IMG_6631.png	png	68796a59e3b66e9040caff4d	07/17/2025
Method used to produce products	IMG_6630.png	png	68796a5c41aa0138bbbe3ed2	07/17/2025
Method used to produce products	IMG_6629.png	png	68796a6041aa0138bbbe3f06	07/17/2025
Method used to produce products	IMG_6628.png	png	68796ac7e3b66e9040cb006d	07/17/2025
Method used to produce products	IMG_6627.png	png	68796acde3b66e9040cb0087	07/17/2025
Method used to produce products	IMG_6626.png	png	68796ad141aa0138bbbe3f90	07/17/2025
Method used to produce products	IMG_6625.png	png	68796ad441aa0138bbbe3fa4	07/17/2025
Method used to produce products	IMG_6624.png	png	68796ad8e3b66e9040cb009b	07/17/2025
Method used to produce products	IMG_6623.png	png	68796b31e3b66e9040cb00b5	07/17/2025
Method used to produce products	IMG_6622.png	png	68796b3441aa0138bbbe3fbe	07/17/2025
Method used to produce products	IMG_6621.png	png	68796b3841aa0138bbbe3fd2	07/17/2025
Method used to produce products	IMG_6620.png	png	68796b3ce3b66e9040cb00c9	07/17/2025
Method used to produce products	IMG_6619.png	png	68796b40e3b66e9040cb00dd	07/17/2025
Method used to produce products	IMG_6618.png	png	68796b94e3b66e9040cb00fd	07/17/2025
Method used to produce products	IMG_6617.png	png	68796b9841aa0138bbbe3ff2	07/17/2025
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Method used to produce products	IMG_6615.png	png	68796ba0e3b66e9040cb0157	07/17/2025
Method used to produce products	IMG_6614.png	png	68796ba4e3b66e9040cb016b	07/17/2025
Method used to produce products	IMG_6613.png	png	68796bfe41aa0138bbbe4039	07/17/2025
Method used to produce products	IMG_6612.png	png	68796c02e3b66e9040cb01b6	07/17/2025
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Method used to produce products	IMG_6608.png	png	68796c6041aa0138bbbe4067	07/17/2025
Method used to produce products	IMG_6607.png	png	68796c64e3b66e9040cb01f8	07/17/2025
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Method used to produce products	IMG_6603.png	png	68796cc341aa0138bbbe40fd	07/17/2025
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Method used to produce products	IMG_6593.png	png	68796d71e3b66e9040cb02ee	07/17/2025
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Sample of unique identifying marks used for branding	IMG_6635.png	png	687971b6e3b66e9040cb07b4	07/17/2025
Sample of unique identifying marks used for branding	IMG_6636.png	png	687971bbe3b66e9040cb07cb	07/17/2025
Sample of unique identifying marks used for branding	IMG_6637.png	png	687971c0e3b66e9040cb07df	07/17/2025
Sample of unique identifying marks used for branding	IMG_6638.png	png	687971c541aa0138bbbe453e	07/17/2025
Sample of unique identifying marks used for branding	IMG_6639.png	png	687971c941aa0138bbbe4552	07/17/2025
Sample of unique identifying marks used for branding	IMG_6640.png	png	6879720ee3b66e9040cb07f9	07/17/2025
Sample of unique identifying marks used for branding	IMG_6641.png	png	68797215e3b66e9040cb0813	07/17/2025
Sample of unique identifying marks used for branding	IMG_6642.png	png	6879721a41aa0138bbbe4572	07/17/2025
Sample of unique identifying marks used for branding	IMG_6643.png	png	6879721e41aa0138bbbe4586	07/17/2025
Sample of unique identifying marks used for branding	IMG_6644.png	png	68797223e3b66e9040cb0827	07/17/2025
Sample of unique identifying marks used for branding	IMG_6645.png	png	6879725ae3b66e9040cb0841	07/17/2025
Sample of unique identifying marks used for branding	IMG_6646.png	png	6879725d41aa0138bbbe45a0	07/17/2025
Restricting Access to age 21 and older	IMG_6648.png	png	68797736e3b66e9040cb0a02	07/17/2025
Restricting Access to age 21 and older	IMG_6649.png	png	6879773a41aa0138bbbe4800	07/17/2025
Restricting Access to age 21 and older	IMG_6650.png	png	6879774e41aa0138bbbe4814	07/17/2025
Restricting Access to age 21 and older	IMG_6651.png	png	68797753e3b66e9040cb0a1c	07/17/2025
Restricting Access to age 21 and older	IMG_6652.png	png	68797757e3b66e9040cb0a30	07/17/2025
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Security plan	IMG_6673.jpeg	jpeg	68799b8f41aa0138bbbe59ba	07/17/2025

Security plan	IMG_6674.jpeg	jpeg	68799b94e3b66e9040cb193a	07/17/2025
Security plan	IMG_6675.jpeg	jpeg	68799bdbe3b66e9040cb1954	07/17/2025
Security plan	IMG_6676.jpeg	jpeg	68799be0e3b66e9040cb1968	07/17/2025
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Security plan	IMG_6678.jpeg	jpeg	68799beb41aa0138bbbe59e8	07/17/2025
Security plan	IMG_6679.jpeg	jpeg	68799bf141aa0138bbbe59fc	07/17/2025
Security plan	IMG_6680.jpeg	jpeg	68799c29e3b66e9040cb1982	07/17/2025
Security plan	IMG_6681.jpeg	jpeg	68799c2d41aa0138bbbe5a16	07/17/2025
Security plan	IMG_6682.jpeg	jpeg	68799c3141aa0138bbbe5a2a	07/17/2025
Security plan	IMG_6683.jpeg	jpeg	68799c36e3b66e9040cb1996	07/17/2025
Prevention of diversion	IMG_6684.jpeg	jpeg	68799e2941aa0138bbbe5a77	07/17/2025
Prevention of diversion	IMG_6685.jpeg	jpeg	68799e2e41aa0138bbbe5a8b	07/17/2025
Prevention of diversion	IMG_6686.jpeg	jpeg	68799e33e3b66e9040cb19f3	07/17/2025
Prevention of diversion	IMG_6687.jpeg	jpeg	68799e38e3b66e9040cb1a07	07/17/2025
Prevention of diversion	IMG_6688.jpeg	jpeg	68799e3d41aa0138bbbe5a9f	07/17/2025
Prevention of diversion	IMG_6689.jpeg	jpeg	68799e7de3b66e9040cb1a21	07/17/2025
Prevention of diversion	IMG_6690.jpeg	jpeg	68799e82e3b66e9040cb1a35	07/17/2025
Prevention of diversion	IMG_6691.jpeg	jpeg	68799e8841aa0138bbbe5ab9	07/17/2025
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Storage of marijuana	IMG_6701.jpeg	jpeg	6879a0c2e3b66e9040cb1b03	07/17/2025
Transportation of marijuana	IMG_6702.jpeg	jpeg	6879a2b841aa0138bbbe5b8b	07/17/2025
Transportation of marijuana	IMG_6703.jpeg	jpeg	6879a2bce3b66e9040cb1b57	07/17/2025
Transportation of marijuana	IMG_6704.jpeg	jpeg	6879a2c0e3b66e9040cb1b6b	07/17/2025
Transportation of marijuana	IMG_6705.jpeg	jpeg	6879a2c541aa0138bbbe5b9f	07/17/2025
Transportation of marijuana	IMG_6706.jpeg	jpeg	6879a2ca41aa0138bbbe5bb3	07/17/2025
Transportation of marijuana	IMG_6707.jpeg	jpeg	6879a31241aa0138bbbe5bd3	07/17/2025
Transportation of marijuana	IMG_6708.jpeg	jpeg	6879a31841aa0138bbbe5be7	07/17/2025
Transportation of marijuana	IMG_6709.jpeg	jpeg	6879a31d41aa0138bbbe5bfb	07/17/2025
Transportation of marijuana	IMG_6710.jpeg	jpeg	6879a32341aa0138bbbe5c0f	07/17/2025
Transportation of marijuana	IMG_6711.jpeg	jpeg	6879a32841aa0138bbbe5c23	07/17/2025

Transportation of marijuana	IMG_6712.jpeg	jpeg	6879a36941aa0138bbbe5c3d	07/17/2025
Transportation of marijuana	IMG_6713.png	png	6879a37041aa0138bbbe5c51	07/17/2025
Transportation of marijuana	IMG_6714.jpeg	jpeg	6879a37541aa0138bbbe5c65	07/17/2025
Transportation of marijuana	IMG_6715.jpeg	jpeg	6879a37ae3b66e9040cb1b91	07/17/2025
Inventory procedures	IMG_6719.png	png	6879a6a7e3b66e9040cb1c0f	07/17/2025
Inventory procedures	IMG_6720.png	png	6879a6ade3b66e9040cb1c23	07/17/2025
Inventory procedures	IMG_6721.png	png	6879a6b4e3b66e9040cb1c37	07/17/2025
Inventory procedures	IMG_6722.png	png	6879a6bae3b66e9040cb1c4b	07/17/2025
Inventory procedures	IMG_6723.png	png	6879a6bf41aa0138bbbe5cd0	07/17/2025
Inventory procedures	IMG_6724.jpeg	jpeg	6879a77fe3b66e9040cb1c74	07/17/2025
Inventory procedures	IMG_6725.jpeg	jpeg	6879a784e3b66e9040cb1c8e	07/17/2025
Inventory procedures	IMG_6726.jpeg	jpeg	6879a78ae3b66e9040cb1ca2	07/17/2025
Inventory procedures	IMG_6727.jpeg	jpeg	6879a78fe3b66e9040cb1cb6	07/17/2025
Inventory procedures	IMG_6728.jpeg	jpeg	6879a79441aa0138bbbe5cfc	07/17/2025
Inventory procedures	IMG_6729.jpeg	jpeg	6879a7d241aa0138bbbe5d16	07/17/2025
Inventory procedures	IMG_6730.jpeg	jpeg	6879a7e641aa0138bbbe5d2a	07/17/2025
Inventory procedures	IMG_6731.jpeg	jpeg	6879a7ec41aa0138bbbe5d3e	07/17/2025
Inventory procedures	IMG_6732.jpeg	jpeg	6879a7f241aa0138bbbe5d52	07/17/2025
Inventory procedures	IMG_6733.jpeg	jpeg	6879a7f941aa0138bbbe5d66	07/17/2025
Inventory procedures	IMG_6734.jpeg	jpeg	6879a84141aa0138bbbe5d86	07/17/2025
Inventory procedures	IMG_6735.jpeg	jpeg	6879a847e3b66e9040cb1cdf	07/17/2025
Inventory procedures	IMG_6736.jpeg	jpeg	6879a84de3b66e9040cb1cf3	07/17/2025
Inventory procedures	IMG_6737.jpeg	jpeg	6879a85241aa0138bbbe5d9a	07/17/2025
Inventory procedures	IMG_6738.jpeg	jpeg	6879a85841aa0138bbbe5dae	07/17/2025
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Inventory procedures	IMG_6740.jpeg	jpeg	6879a892e3b66e9040cb1d21	07/17/2025
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Diversity plan	IMG_8849.png	png	690cef54c1a1ec508a036038	11/06/2025

ATTESTATIONS

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

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

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

Notification:

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification:

COMPLIANCE WITH POSITIVE IMPACT PLAN - PRE FEBRUARY 27, 2024

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

PRODUCT MANUFACTURER SPECIFIC REQUIREMENTS

No records found

HOURS OF OPERATION

Monday From: 9:00 AM	**Monday To:** 5:00 PM
Tuesday From: 9:00 AM	**Tuesday To:** 5:00 PM
Wednesday From: 9:00 AM	**Wednesday To:** 5:00 PM
Thursday From: 9:00 AM	**Thursday To:** 5:00 PM
Friday From: 9:00 AM	**Friday To:** 5:00 PM
Saturday From: Closed	**Saturday To:** Closed
Sunday From: Closed	**Sunday To:** Closed

MA SOC Filing Number: 202239021300 Date: 9/7/2022 3:29:00 PM

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:

September 07, 2022 03:29 PM



WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
REAL PROPERTY	MATTHEW NELSON	82 WENDELL AVE. STE 100 PITTSFIELD, MA 01201 USA

9. Additional matters:

SIGNED UNDER THE PENALTIES OF PERJURY, this 7 Day of September, 2022,
MATTHEW NELSON

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

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(f) the compromise or release of any of the Company's claims or debts; and

(g) the employment of persons, firms, or corporations for the operation and management of the Company's business.

The member is further authorized to execute and deliver:

(w) all contracts, conveyances, assignments leases, sub-leases, franchise agreements, licensing agreements, management contracts and maintenance contracts covering or affecting Company assets;

(x) all checks, drafts, and other orders for the payment of the Company's funds;

(y) all promissory notes, loans, security agreements, and other similar documents; and

(z) all other instruments of any other kind relating to the Company's affairs.

4.4. **NOMINEE.** Title to the Company's assets must be held in the Company's name or in the name of any nominee that the member may designate. Pursuant to the powers listed in Section 4.3, the member has the power to enter into a nominee agreement with any such person, and such agreement may contain provisions indemnifying the nominee, except for his or her willful misconduct.

4.5. **EXCULPATION.** Any act or omission of the member, the effect of which may cause loss or damage to the Company, if done in good faith to promote the best interests of the Company, will not subject the member to any liability.

4.6. **INDEMNIFICATION.** The Company will indemnify any person who was or is a party defendant or is threatened to be made a party defendant, in a pending or completed action, suit or proceeding, whether civil, criminal, administrative, or investigative (other than an action by or in the right of the Company) by reason of the fact that the person is or was a member of the Company, employee, or agent of the Company, or is or was serving at the request of the Company, for instant expenses (including attorney's fees), judgments, fines, and amounts paid in settlement actually and reasonably incurred in connection with such action, suit or proceeding if the member determines that the person acted in good faith and in a manner he or she reasonably believed to be in or not opposed to the best interest of the Company, and with respect to any criminal action proceeding, has no reasonable cause to believe his or her conduct was unlawful. The termination of any action, suit, or proceeding by judgment, order, settlement, conviction, or upon a plea of "no lo Contendere" or its equivalent, does not in itself create a presumption that the person did or did not act in good faith and in a manner which he or she reasonably believed to be in the best interest of the Company, and, with respect to any criminal action or proceeding, had reasonable cause to believe that his or her conduct was lawful.

4.7. **RECORDS.** The member must keep the following at the Company’s principal place of business or other location:

(a) A current list of the full name and the last known street address of each member;

(b) A copy of the Articles of Organization, this operating agreement, and all amendments to either document;

(c) Copies of Company's federal, state and local income tax returns and reports for the three (3) most recent years;

(d) Copies of the Company's financial statements for the three (3) most recent years.

ARTICLE V
Compensation

5.1. **MANAGEMENT FEE.** The member rendering services to the Company is entitled to compensation proportionate with the value of those services.

5.2. **REIMBURSEMENT.** The Company must reimburse the member for all direct out-of-pocket expenses incurred in managing the Company.

ARTICLE VI
Bookkeeping

6.1. **BOOKS.** The member will maintain a complete and accurate accounting of the Company's affairs at the Company's principal place of business. The member may select the method of accounting and the company's accounting period will be the calendar year.

6.2. **MEMBER'S ACCOUNTS.** The member's capital account will be determined and maintained in the manner set forth in Treasury Regulation 1.704-l(b)(2)(iv) and will consist of his or her initial capital contribution increased by:

(a) Any additional capital contribution made by the member;

(b) Credit balances transferred from the member's distribution account to his or her capital account;

and decreased by:

(x) Distributions to the member in reduction of Company capital;

(y) The member's share of Company losses if charged to his or her capital account.

6.3. **REPORTS.** The member will close the books of account after the close of each calendar year and will prepare a statement of such member's distributive share of income and expense for income tax reporting purposes. The member must keep such statements with the other financial statements kept pursuant to Section 4.7(d).

ARTICLE VII
Transfers

7.1. **ASSIGNMENT.** The member may sell, assign, or otherwise dispose of all or any part of his or her interest in the Company.

ARTICLE VIII
Dissolution

8.1. **DISSOLUTION.** The member may dissolve the company at any time. The member may NOT dissolve the company for a loss of membership interests. Upon dissolution the company must

1.8. **ADMISSION OF ADDITIONAL MEMBERS.** Additional members may only be admitted to the Company through a Certificate of New Membership issuance by the company of new interest in the Company or as otherwise provided in this agreement.

ARTICLE II
Capital Contributions

2.1. **INITIAL CONTRIBUTIONS.** The member will initially contribute capital to the Company, as described in Exhibit 1 attached to this agreement. The agreed total value of such property and cash is _____.

2.2. **ADDITIONAL CONTRIBUTIONS.** Except as provided in ARTICLE 6.2, no member will be obligated to make any additional contribution to the Company's capital.

ARTICLE III
Profits, Losses and Distributions

3.1. **PROFITS/LOSSES.** For financial accounting and tax purposes, the Company's net profits or net losses will be determined on an annual basis. These profits and losses will be allocated to the member as set forth in this agreement below, as amended, and in accordance with Treasury Regulation 1.704-1.

3.2. **DISTRIBUTIONS.** The member will determine and distribute available funds annually or as they see fit. “Available funds” refers to the net cash of the Company available after expenses and liabilities are paid. Upon liquidation of the Company, distributions will be made in accordance with the positive capital account balances or pursuant to Treasury Regulation 1.704-l(b)(2)(ii)(b) (2). To the extent the member has a negative capital account balance, there will be a qualified income offset, as set forth in Treasury Regulation 1.704-l(b)(2)(ii)(d).

ARTICLE IV
Management

4.1. **MANAGEMENT OF THE BUSINESS.** The member is responsible for the management of the Company.

4.2. **MEMBERS.** The liability of the member will be limited according to state law.

4.3. **POWERS OF MEMBERS.** The member is authorized on the Company's behalf to make decisions as to:

(a) the sale, development, lease, or other disposition of the Company's assets;
(b) the purchase or other acquisition of other assets;
(c) the management of all or any part of the Company's assets;
(d) the borrowing of money and the granting of security interests in the Company’s assets;
(e) the pre-payment, refinancing, or extension of any loan affecting the Company’s assets;

OPERATING AGREEMENT

FOR

BURN BRIGHT LLC

A SINGLE MEMBER-MANAGED LIMITED LIABILITY COMPANY

ARTICLE I
Company Formation

1.1. **FORMATION.** The member has formed a Limited Liability Company (the "Company") according to the laws of the state in which the Company was formed. This operating agreement is entered into and effective as of the date it is adopted by the member.

1.2. **REGISTERED AGENT.** The name and location of the Company's registered agent will be stated in the company's formation documents.

1.3. **TERM.** The Company will continue perpetually unless:

(a) The sole member resolves to dissolve;

(b) Any event which causes the Company's business to become unlawful;

(c) The death, resignation, expulsion, bankruptcy, retirement of the sole member or the occurrence of any other event that terminates the continued membership of a member of the Company; or

(d) Any other event causing dissolution of the Company under applicable state laws.

1.4. **CONTINUANCE OF COMPANY.** In the event of an occurrence described in Section 1.3(c), the Company will expire and may be administratively dissolved.

1.5. **BUSINESS PURPOSE.** The Company will conduct any lawful business deemed appropriate in carrying out the Company's objectives.

1.6. **PRINCIPAL PLACE OF BUSINESS.** The Company's principal place of business will be stated in the formation documents, or as later selected by the member.

1.7. **THE MEMBER.** The name and residential address of the sole member is listed in Certification of Member section of this agreement.

The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: $500.00

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

Certificate of Organization
(General Laws, Chapter)

Identification Number: 001601940

1. The exact name of the limited liability company is: BURN BRIGHT CANNABIS, LLC

2a. Location of its principal office:
No. and Street: 82 WENDELL AVE. STE 100
City or Town: PITTSFIELD State: MA Zip: 01201 Country: USA

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

No. and Street: 82 WENDELL AVE. STE 100
City or Town: PITTSFIELD State: MA Zip: 01201 Country: USA

3. The general character of business, and if the limited liability company is organized to render professional service, the service to be rendered:
APPLYING FOR LICENSE WITH THE CCC

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:
Name: REGISTERED AGENTS INC.
No. and Street: 82 WENDELL AVE. STE 100
City or Town: PITTSFIELD State: MA Zip: 01201 Country: USA

I, I BILL HAVRE OF REGISTERED AGENTS INC. resident agent of the above limited liability company, consent to my appointment as the resident agent of the above limited liability company pursuant to G. L. Chapter 156C Section 12.

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
SOC SIGNATORY	MATTHEW NELSON	82 WENDELL AVE. STE 100 PITTSFIELD, MA 01201 USA

pay its debts first before distributing cash, assets, and/or initial capital to the member or the member's economic interests. The dissolution may only be ordered by the member, not by the owner of the member's economic interests.

CERTIFICATION OF MEMBER

The undersigned hereby agree, acknowledge, and certify that the foregoing operating agreement is adopted and approved by the member as of this 23 day of October, 2025.

Member:

Name Matthew Emerick Nelson Percent 100 % X _____

Address 146 Adams st, Fairhaven
MA,. 02719

EXHIBIT 1
CAPITAL CONTRIBUTIONS

Pursuant to ARTICLE 2, the member's initial contribution to the Company capital is stated to be $_____. The description and each individual portion of this initial contribution is as follows:

_____ $_____
_____ $_____
_____ $_____
_____ $_____
_____ $_____
_____ $_____
_____ $_____
_____ $_____

SIGNED AND AGREED this 23 day of October, 2025.

_____
Signature of Member

4:44 PM Thu Jul 17 52%

- Startup Costs : Burn Bright will outline costs associated with obtaining the manufacturing license, equipment purchases, production materials, marketing, and operational expenses.

- Revenue Projections : Burn Bright will base potential sales on current market research, pricing strategies, and expected production levels.

- Funding Requirements : Burn Bright will determine if additional funding is needed through loans, investors, or grants to support our manufacturing operations.

Management Team

- Leadership : Outline the roles of the founders and any additional key team members. Highlight relevant experience and expertise in the cannabis industry, business management, and production processes.

- Advisory Board : Burn Bright llc with consider forming an advisory board with industry experts to provide guidance and strategic direction.

Compliance and Regulations

- Licensing : Burn Bright will secure the manufacturing license, and plans to remain compliant with all state regulations and local ordinances.
- Health and Safety : Implement health and safety protocols in the manufacturing facility to ensure employee safety and product quality.

Conclusion

Burn Bright LLC is poised to make a significant impact in the Massachusetts cannabis market with our unique approach to infused prerolls. By focusing on sustainability, quality, and innovative practices, we aim to establish a loyal customer base and contribute positively to the industry. This business plan outlines our vision for growth and our commitment to excellence as we apply for our manufacturing license.

4:44 PM Thu Jul 17 52%

- Differentiation : Burn Bright LLC will stand out by emphasizing our use of sustainably sourced cannabis, innovative production techniques, and commitment to quality. Our unique selling proposition will be the use of bubble hash from previously discarded materials, positioning us as a responsible choice for consumers.

Production Plan

- Cultivation : With our existing cultivation license, we will grow premium cannabis strains that are ideal for preroll production. Our cultivation methods will prioritize organic practices and sustainable growing techniques.

- Manufacturing Process :

  - Harvesting : Select high-quality flower for prerolls.

  - Extraction : Use bubble hash made from previously discarded materials to infuse prerolls.

  - Production : Employ skilled staff to roll prerolls efficiently, ensuring consistent quality and potency.

  - Quality Control : Implement rigorous testing for potency and contaminants at every stage of production.

Marketing Strategy

- Brand Development : Build a strong brand identity that reflects our values of sustainability, quality, and innovation. Create an engaging logo and packaging that appeals to our target market.

- Promotion :

  - Social media marketing to engage with consumers and build a community around our brand.

  - Collaborations with local dispensaries for product placements and promotions.

  - Participation in industry events and trade shows to showcase our products and network with potential partners.

- Sales Strategy : Burn Bright will focus on direct sales to dispensaries and partnerships with established retailers in the Massachusetts market.

Financial Plan

4:44 PM Thu Jul 17 52%

Business Plan for Burn Bright LLC - Manufacturing License

Executive Summary

Burn Bright LLC aims to establish itself as a premier provider of high-quality infused cannabis prerolls in the Massachusetts adult-use market. By leveraging our cultivation license, we will source our own cannabis and utilize a sustainable production process that incorporates bubble hash made from previously discarded plant materials. Our mission is to produce premium, eco-friendly products that enhance the consumer experience while promoting responsible consumption.

Business Description

Business Name : Burn Bright LLC
Location : 110 winter st, Holyoke Massachusetts. 01043
Business Structure : Limited Liability Company (LLC)
Founders : Matthew Nelson
Date Established : 6/22/ 2022

Burn Bright LLC is committed to sustainability and innovation in the cannabis industry. Our goal is to create infused prerolls that are not only flavorful and potent but also environmentally responsible. We plan to implement practices that reduce waste and maximize the use of our cultivated materials.

Market Analysis

- Industry Overview : The cannabis industry in Massachusetts has experienced rapid growth since legalization. The adult-use market is expanding, with increasing consumer demand for high-quality, innovative products.

- Target Market : Our primary customers will be adult consumers aged 21 and over, with a focus on those interested in premium, infused products. We will also target dispensaries looking for unique offerings to enhance their inventory.

- Market Trends : There is a rising trend towards sustainability and eco-conscious products in the cannabis market. Consumers are increasingly seeking out brands that prioritize environmental responsibility and quality.

Competitive Analysis

- Competitors : We will analyze local and regional competitors offering infused prerolls and bubble hash products. Key competitors include established cannabis brands and local cultivators.

4:30 PM Thu Jul 17 58%

8.1 Dissolution: The Company shall dissolve upon the occurrence of any of the following events:

- The unanimous agreement of the Members;
- The entry of a decree of judicial dissolution; or
- Any other event that requires dissolution under applicable law.

8.2 Winding Up: Upon dissolution, the Members shall proceed to wind up the affairs of the Company, pay its debts, and distribute any remaining assets to the Members in accordance with their respective interests.

ARTICLE IX: MISCELLANEOUS

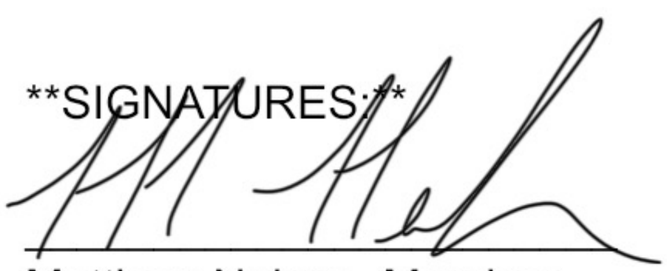
9.1 Governing Law: These Bylaws shall be governed by and construed in accordance with the laws of the State of [insert state].

9.2 Severability: If any provision of these Bylaws is found to be invalid or unenforceable, the remaining provisions shall continue in full force and effect.

ADOPTION

These Bylaws were adopted by the Members of Burn Bright LLC on this 07/17/2025

SIGNATURES:



Matthew Nelson, Member

4:29 PM Thu Jul 17 58%

4.2 Voting: Each Member shall have voting rights proportional to their percentage interest in the Company. Matters requiring Member approval shall be decided by a majority vote unless otherwise specified in these Bylaws.

4.3 Meetings: Regular meetings of the Members shall be held at least annually. Special meetings may be called by any Member upon reasonable notice to all other Members.

4.4 Quorum: A quorum for the transaction of business at any meeting shall consist of a majority of the Members, represented in person or by proxy.

ARTICLE V: FINANCIAL MATTERS

5.1 Fiscal Year: The fiscal year of the Company shall end on the 31st day of December of each year.

5.2 Capital Contributions: Members shall contribute capital to the Company as agreed upon in writing by the Members. No Member shall be required to make additional contributions without their consent.

5.3 Distributions: Distributions of profits shall be made to the Members at such times and in such amounts as determined by the Members, in accordance with their respective percentage interests.

5.4 Records: The Company shall maintain complete and accurate books and records of its financial transactions and affairs.

ARTICLE VI: INDEMNIFICATION

6.1 Indemnification: To the fullest extent permitted by law, the Company shall indemnify any Member, manager, or officer of the Company against any and all expenses and liabilities incurred in connection with the Company, provided that such indemnification shall not apply to matters arising from gross negligence or willful misconduct.

ARTICLE VII: AMENDMENTS

7.1 Amendments: These Bylaws may be amended or repealed, and new Bylaws may be adopted, by the unanimous written consent of the Members.

ARTICLE VIII: DISSOLUTION

4:29 PM Thu Jul 17 58%

BYLAWS OF BURN BRIGHT LLC

ARTICLE I: NAME AND PRINCIPAL OFFICE

1.1 Name: The name of the limited liability company is Burn Bright LLC (hereinafter referred to as the “Company”).

1.2 Principal Office: The principal office of the Company shall be located at 110 winter st unit 2, Holyoke, MA 01043, or such other location as may be determined by the Members from time to time.

ARTICLE II: PURPOSE

2.1 Purpose: The purpose of the Company is to engage in the manufacturing, processing, packaging, and distribution of cannabis and cannabis-related products, including all activities permissible under applicable state and federal law, and to conduct any other lawful business as determined by the Members.

ARTICLE III: MEMBERS

3.1 Members: The Company shall have one or more Members whose names and addresses shall be recorded in the Company’s books. The initial Members of the Company are as follows:

Matthew Nelson, CEO, 146 Adams st apt 2, Fairhaven, MA. 02719

3.2 Admission of New Members: New Members may be admitted to the Company upon the unanimous consent of the existing Members, in compliance with applicable laws and regulations.

3.3 Member Interests: Member interests in the Company shall be represented by percentage interests, which shall be determined by the Members upon formation and may be amended as necessary.

ARTICLE IV: MANAGEMENT

4.1 Management: The Company shall be managed by its Members. Each Member shall have authority to act on behalf of the Company in the ordinary course of business.

UNITED STATES POSTAL SERVICE.

FAIRHAVEN
13 WILLIAM ST
FAIRHAVEN, MA 02719-9998
www.usps.com

10/06/2025 11:53 AM

TRACKING NUMBERS
9589 0710 5270 2268 5409 67

TRACK STATUS OF ITEMS WITH THIS CODE
(UP TO 25 ITEMS)

TRACK STATUS BY TEXT MESSAGE
Send tracking number to 28777 (2USPS)
Standard message and data rates may apply

TRACK STATUS ONLINE
Visit https://www.usps.com/tracking
Text and e-mail alerts available

PURCHASE DETAILS

Product	Qty	Unit Price	Price
First-Class Mail® Letter Holyoke, MA 01040 Weight: 0 lb 0.30 oz Estimated Delivery Date Thu 10/09/2025	1		$0.78
Certified Mail® Tracking #: 9589 0710 5270 2268 5409 67			$5.30
Affixed Postage Affixed Amount: $0.78			-$0.78
Total			$5.30

Grand Total: $5.30

Debit Card Remit $5.30
Card Name: VISA
Account #: XXXXXXXXXXXX8652
Approval #: 794649
Transaction #: 557
Receipt #: 028708
Debit Card Purchase: $5.30
AID: A0000000980840 Chip
AL: US DEBIT
PIN: Verified

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Agents do not have any additional information other than what is provided on USPS.com.

9589 0710 5270 2268 5409 67

U.S. Postal Service™
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For delivery information, visit our website at www.usps.com®.
Holyoke, MA 01040

OFFICIAL USE

Certified Mail Fee $5.30
Extra Services & Fees (check box, add fee as appropriate)
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- Return Receipt (electronic) $0.00
- Certified Mail Restricted Delivery $0.00
- Adult Signature Required $0.00
- Adult Signature Restricted Delivery $0.00

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Street and Apt. No., or PO Box No.
City, State, ZIP+4®

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

FAIRHAVEN MA 02719
OCT 10 2025
10/05/2025

** **Notice to Abutters****

Dear Neighbors,

We are pleased to inform you that Burn Bright LLC will be hosting a community outreach meeting on **October 20 at 5:15 PM**. The meeting will take place in the parking lot of ****110 Winter St., Unit 2, Holyoke, Ma 01040****, the proposed location for the business.

This meeting is an opportunity for you to learn more about our plans, ask questions, and share your thoughts. We value your input and want to ensure that our business aligns with the interests of the community.

If you have any questions, comments, or concerns, please feel free to reach out to our CEO, Matthew Nelson, at **Burnbright2022@gmail.com**.

We look forward to seeing you there!

Sincerely,
Burnbright LLC

Community Outreach Meeting for Proposed Cannabis Courier and Manufacturer

Inbox

---

me Sep 18

NOTICE OF COMMUNITY OUTREACH MEETING To: City Clerk City of Holyoke Holyoke, MA 01040 Dear City Clerk, Th...

Brenna Leary Sep 22

Received! _____ Brenna Murphy Leary, MMC City Clerk/Registrar of Voters C...

---

me Oct 2

to Brenna

Hey Brenna,

I hope you are doing well, the Cannabis Control Commission reached out to me and wanted our company to host another community outreach meeting, we've scheduled it for October 20th, at the proposed location of 110 winter street unit 2 in Holyoke, Ma. A public notice will be published in the Daily Hampshire Gazette on Monday October 6th, and I just wanted to notify the clerks offices of the upcoming meeting for the commission. Thank you!

All the best,
Matthew Nelson
CEO, Burn Bright LLC
774-400-5965

Brenna Leary Oct 3

to me

Thank you!

Advertising Receipt

CREDIT LEGALS
23 SERVICE CENTER RD
NORTHAMPTON, MA 01060

Cust#:22224
Ad#:4449349
Phone#:413-586-1700
Date:10/02/2025

Salesperson: Pam Paquette Classification: Legals Ad Size: 1.0 x 1.80

Advertisement Information:

Description	Start	Stop	Ins.	Cost/Day	Total
Daily Hampshire Gazette	10/06/2025	10/06/2025	1	119.39	119.39

Payment Information:

Date:	Order#	Type
10/02/2025	4449349	CreditCard

Total Amount: 119.39
Tax: 0.00
Total Payments: 119.39
Amount Due: 0.00

- Thank you for your business!

Ad Copy

Community Outreach Meeting

Burn Bright LLC, a proposed marijuana manufacturer and courier, is giving notice of a Community Outreach meeting on October 20, 2025, at 5:15 PM (in the parking lot) at 110 Winter Street, Holyoke, MA 01043, the proposed location. There will be an opportunity for the public to ask questions. Questions can also be emailed to BurnBright2022@gmail.com.

October 6

4449315

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Community Outreach Meeting Attestation Form

Instructions

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

Attestation

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

1. The Community Outreach Meeting was held on the following date(s): Oct 20, 2025

2. At least one (1) meeting was held within the municipality where the ME is proposed to be located.

3. At least one (1) meeting was held after normal business hours (this requirement can be satisfied along with requirement #2 if the meeting was held within the municipality and after normal business hours).

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

   a. Date of publication: 10/06/2025

   b. Name of publication: Daily Gazette

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

   a. Date notice filed: October 2, 2025

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

   a. Date notice(s) mailed: 10/06/2025

7. The applicant presented information at the Community Outreach Meeting, which at a minimum included the following:
   a. The type(s) of ME or MTC 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 ME or MTC to prevent diversion to minors;
   d. A plan by the ME or MTC to positively impact the community; and
   e. Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.

8. Community members were permitted to ask questions and receive answers from representatives of the ME or MTC.

Name of applicant:

Matthew Nelson (BurnBright LLC)

Name of applicant's authorized representative:

Signature of applicant's authorized representative:

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

mass.gov/dor

Letter ID: L0793935776
Notice Date: April 28, 2025
Case ID: 0-002-856-434

CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE

000003

BURN BRIGHT LLC
1 CABOT ST UNIT 8
HOLYOKE MA 01040-6097

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, BURN BRIGHT LLC dba:BURN BRIGHT LLC 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, Monday through Friday, 9:00 a.m. to 4:00 p.m.

Visit us online!

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

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

Edward W. Coyle, Jr., Chief
Collections Bureau

Retention Strategies: Burn Bright will implement mentorship, professional development opportunities, and a supportive work environment to retain diverse employees.

Programs

To achieve these goals, Burn Bright has developed targeted programs:

Program 1: Diversity Education Program
All employees will participate in mandatory diversity training within 30 days of onboarding, repeated annually. This program will address issues like unconscious bias, diversity policies, and the importance of inclusivity in the workplace.

Program 2: Quarterly Cultural Potlucks
Burn Bright will host quarterly staff potlucks, allowing employees to share their cultural backgrounds and culinary traditions, fostering community and inclusivity.

Program 3: Veteran Employment Program
This program will offer flexible work arrangements for veterans, including remote options and mentorship, to support their transition to civilian life. Regular feedback will be gathered to assess effectiveness.

Measurements/ Metrics

The CEO will oversee the implementation of this Plan and monitor progress through measurable outcomes, including:

- Documenting the diverse composition of staff and ensuring compliance with target percentages and report to the appropriate authorities.
- Counting number of employees highed per demographic
- Tracking the number of mentorship participants and their success rates.
- Reporting on job fairs and recruitment efforts targeting underrepresented populations.
- Providing annual reports to the Commonwealth, indicating progress towards goals and areas for improvement.
Document the number of diverse suppliers, vendors, and contractors, contacted for services or products in the number of diverse companies that are engaged to determine if the percentage goals for contracts, with various types of diverse businesses are achieved

1:55 PM Thu Nov 6 63%

Diversity Plan for Burn Bright LLC
Purpose

Burn Bright LLC (Burn Bright) is a proposed Veteran-owned and Veteran-led Indoor Cultivator, manufacturer, and courier operator. Committed to reinvesting in Holyoke, Burn Bright aims to foster diversity and inclusion within the community it serves. This Diversity Plan (Plan) outlines Burn Bright's commitment to promoting equity among disenfranchised populations, including but not limited to, Black, African American, Hispanic, Latinx, Indigenous people; Women; Veterans; Persons with disabilities; LGBTQ+ individuals; and those disproportionately impacted by the war on drugs.

Goals

To promote equity, Burn Bright has established the following distinct goals:

Goal 1: Establish a Comprehensive Mentorship Program
Burn Bright will implement **separate** mentorship program specifically designed to provide industry-specific training to at least four (4) individuals from underrepresented groups annually. This program will include:

Frequency and Duration: The mentorship program will be conducted annually, with each mentorship program lasting one month.

Outreach Methods: Recruitment will be conducted via social media platforms, local community boards, and partnerships with educational institutions and cannabis industry events. Applications will be solicited from individuals demonstrating a genuine interest in cannabis cultivation and specific mentorship goals.

Selection Criteria: Candidates will be interviewed based on their commitment to the program, relevant experience, and alignment with Burn Bright's mission.

Goal 2: Create a Diverse and Inclusive Workforce
Burn Bright will implement strategies to ensure a diverse workforce, aiming for specific employee demographics as follows:

Target Percentages: 70% women, 20% people of color (including Black, African American, Hispanic, Latinx, and Indigenous individuals), 50% veterans, 10% persons with disabilities, and 20% individuals who identify as LGBTQ+.

Outreach Methods: Job postings will be advertised in English and Spanish across various platforms, including local job boards, community centers, and diversity-focused organizations. Participation in job fairs and collaboration with local nonprofits will further enhance outreach efforts.

1:55 PM Thu Nov 6 63%

Acknowledgements

The CEO will be responsible for ensuring the ongoing accountability of all employees to uphold the initiatives outlined in this Plan. Progress will be reviewed quarterly, and updates will be made available to the Commission upon request. Burn Bright LLC will adhere to all relevant regulations and guidelines to maintain compliance and foster a culture of diversity and inclusion.

Program 3: Veteran Employment Program — Burn Bright will make efforts to work directly with the CHDVS and other local Veteran-focused organizations to advertise open positions to veterans and disabled veterans, in compliance with 935 CMR 500.105(4). Burn Bright will create job postings to be posted in public spaces within the CHDVS facilities and digitally syndicated on veteran-focused job boards. Burn Bright will also collaborate with these organizations to co-host a community career fair, where open roles will be advertised and explained in further detail so potential applicants can understand where their current skills translate seamlessly in cannabis cultivation.

IV. Measurements

The Chief Executive Officer (CEO) will administer this Plan and will be responsible for developing measurable outcomes to ensure Burn Bright continues to meet its goals and progress each commitment. Such measurable outcomes, in accordance with Burn Bright's goals and programs described above, include:

1. Maintaining documentation of the diverse composition of our staff through a comprehensive report, Documenting that staff is comprised of at least 50% women; 15% minorities; 10% veterans; 5% LGBTQ+; and 5% people with disabilities.
2. Recording the number of open positions posted on the Department of Veterans' Services of Holyoke job board;
3. Documenting the number of job fairs that Burn Bright hosts or participates in in Holyoke.
4. Providing reports measuring the effectiveness of our Diversity cultural program and number of individuals engaged in the program.

Upon receipt of Burn Bright's Final Approval from the Commission to operate a marijuana establishment in the Commonwealth, Burn Bright will utilize the proposed measurements to assess this Plan and will demonstrate proof of success or progress of the Plan upon each yearly renewal of the license. The CEO will review and evaluate Burn Bright's measurable outcomes no less than quarterly to ensure Burn Bright is reporting on progress accurately and meeting the goals of each commitment.

V. Acknowledgements

The CEO is responsible for developing the foundation of this Plan, ensuring and measuring progress towards each diversity initiative set forth by Burn Bright. The CEO will hold all future owners, investors, and employees accountable for respecting and implementing initiatives set forth throughout. The CEO will reevaluate this plan once per quarter and will present a Progress Report, to be made available to the Commission upon request, indicating the goals achieved, progress made, and areas requiring improvement. The CEO will show progress and/or success of this Plan once per year upon renewal of the license. Burn Bright LLC will adhere to the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment. Actions taken, or programs instituted, by Burn Bright will comply with all CCC regulations.

1:51 PM Thu Sep 18 62%

BURN BRIGHT LLC
MASSACHUSETTS ADULT-USE MARIJUANA PRODUCT MANUFACTURER:
ENERGY COMPLIANCE PLAN

Burn Bright LLC is currently in the pre-operational phase and has not yet commenced licensed activities. As such, we are not yet utilizing energy systems or lighting products within a functioning cultivation or production environment. Accordingly, we are unable to provide a Cannabis Power Score, Energy Compliance or Exemption Letter, or a Third-Party Safety Certification for Lighting Products at this time.
However, we are fully committed to meeting all regulatory requirements and ensuring energy-efficient and compliant operations. All necessary documentation will be obtained and submitted with an Architectural Review prior to the commencement of operations, in full alignment with Massachusetts energy and safety standards for cannabis facilities. Once operational we will maintain-

Identification of potential energy use reduction opportunities, such as natural lighting in energy, efficient measures, and a plan for implementation of such opportunities. **935 CMR 500.105 (15)**

Consideration of opportunities for renewable energy generation, including, where, applicable, submission of building plans, showing where energy generators could be placed on the site and explanation of why they identified opportunities were not pursued, if applicable. **935 CMR 500. 105 (15)**

Strategies to reduce electric demand (such as lighting schedules, active load management, and energy storage). **935 CMR 500.105 (15)**

Engagement with energy efficiency programs offered pursuant to **M.G.L.c.25, 21**, or through municipal lighting plans. **935 CMR 500.105 (15)**.

◀ Drive 5:59 PM Fri Jul 18 ••• 12%

- A policy for providing all necessary access to the Commission and the DOR to audit and examine its point-of-sale system in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.000.

Salary and Wages (935 CMR 500.105(9)(e)(5))

Salary and wages include compensation paid to each employee, stipends paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with Applicant, as applicable.

General payroll will be processed and paid by a payroll processing company initially and will evolve into use of a professional employer organization (PEO).

Salaries and wages records will include complete information on all of the following:

- Employee salaries and wages;
- Executive compensation;
- Bonuses;
- Benefits whether company paid or subject to employee deduction; and
- Any other items of value that are provided to any employees.

Stipends to board members shall be accrued as necessary in accordance with the agreement and payment shall be recorded when paid.

Additional Record Keeping Procedures

Details covering the following relevant record keeping standards and practices are covered in Applicant's *Recordkeeping Plan*:

- Recordkeeping Team;
- Record Creation & Storage (*Physical and Digital*);
- Record Requests; and
- Record Destruction.

Cash Handling Procedures

Applicant's cash handling SOPs are designed to protect cash from theft, prevent mistakes in accounting, ensure accurate tax accounting, and to provide employees with defined in handling cash. Applicant appreciates the additional operational and compliance burdens imposed on financial institutions with Marijuana Establishment clients, and is prepared to provide all necessary assistance and documentation to help any financial institution where Applicant owns an account remain compliant with all relevant FinCEN guidance related to banking Marijuana transactions, such as FIN-2014-G001, and other applicable financial regulations, including the

◀ Drive 5:59 PM Fri Jul 18 ••• 13%

cash flows, including payments made and received pursuant to invoices and bills. Moreover, with the accounting software, the Bookkeeper will prepare month-end and quarter-end financial statements that will include, among other financial records: a balance sheet; a statement of income; and a statement of cash flows. By maintaining detailed financial records, Applicant can make sound economic decisions and ensure the Company's financial viability.

Pursuant to 935 CMR 500.105(2)(a)-(b), Marijuana Establishment Agents employed by Applicant who are responsible for any accounting and financial operations, such as aforementioned Bookkeeper or any member of the RT, will undergo extensive training procedures to ensure prompt and accurate financial recordkeeping. Applicant will impose upon such employees the highest standards of care relating to financial operating procedures, and Applicant will terminate the employment of any employee who shows continued negligence in recording financial transactions and maintaining records of transactions and books of account. Further information on Applicant's employee training programs can be found in Applicant's *Qualifications and Training Plan*.

Applicant will retain a third-party accountant to review Applicant's journal entries and books of account on at least a quarterly basis, if not more frequently. Applicant will reflect any revisions suggested by the accountant and note the change to the Company's records. This engagement is one example of how Applicant will implement checks and balances to ensure the continued accuracy its financial operations and accounting practices. Applicant's books of account will be maintained using Generally Accepted Accounting Principles (GAAP), which will improve the reliability and utility of the financial reports for third parties.

Applicant will keep meticulous records related to taxes due to the Commonwealth pursuant to 830 CMR 63.00, Taxation of Corporations; to the City of Holyoke; and to the Federal Government.

Applicant will maintain its tax records for a period of at least seven (7) years, consistent with the Company's Host Community Agreement with the City of Holyoke.

Applicant will retain documentation supportive of its calculation of the Host Community fee, including, without limitation, gross revenue and seed-to-sale tracking data.

Sources of capital and investor information will be maintained and organized in a thorough manner, so that Applicant can anticipate and notify the Commission of any contemplated Ownership or Control Change scenarios (such as through equity capital raising, or stock buybacks, for example) as required by 935 CMR 500.104(1)(b). Applicant's bankers and legal counsel will hold replicate records of the Company's investor list to ensure efficiency when addressing questions from the Commission and other regulators.

◀ Drive 5:59 PM Fri Jul 18 13%

Financial Records Maintenance Procedures

The following policies and procedures for Maintaining of Financial Records are written in accordance with 935 CMR 500.105(9)(e). All financial records will be available to the Commission upon request in a timely manner, as required by 935 CMR 500.301(1). To protect the integrity of financial records deemed "confidential," Applicant will, in satisfaction of 935 CMR 500.105(1)(l), protect such records and make them available only to authorized Marijuana Establishment Agents, the Commission, and any authorized third parties who require access to such records.

The following records shall be maintained by Applicant:

Assets and Liabilities (935 CMR 500.105(9)(e)(1))

- Assets and liabilities shall be reflected in the reports that are generated from Applicant's accounting software (QuickBooks or similar) which shall be determined based on the valid recording of the transactions and reconciled to subsidiary ledgers and third-party independent records when available;
- Assets shall be recorded immediately upon procurement whether paid on delivery or owing to the vendor; and
- Liabilities shall be recorded immediately upon receipt of a vendor invoice or similar document or upon receipt of goods or services when such document is unavailable (based on the purchase order, vendor agreement or other similar external documents).

Monetary Transactions (935 CMR 500.105(9)(e)(2))

All monetary transactions shall be recorded immediately upon execution.

<u>Payments Received</u>

- Cash and electronic payments received shall be recorded immediately into Applicant's Commission-compliant point-of sale system, Greenbits or similar, which will feed to the general accounting records through the application integration.

<u>General banking protocols</u>

- Internal company records representing bank accounts shall be reconciled daily using online banking functions with concluding reconciliations performed at the end of each monthly accounting period.

◀ Drive 5:59 PM Fri Jul 18 ••• 12%

Bank Secrecy Act, as needed, and to reduce the effort associated with any related due diligence that the Bank may seek to perform.

Applicant will take great care to ensure that cash is securely stored within the facility and will implement detailed written operating procedures for the handling of cash including but not limited to storage, collection frequency, and transport to financial institutions, as required by 935 CMR 500.105(1)(o). These procedures will limit cash on site to the minimum amount needed for daily operations, and are described in further detail in Applicant's *Diversion Prevention Plan.*

Records of all cash transactions will be kept in digital form. Records of deposits will be kept in both written and digital form. Physical records will be stored in the Secure Records Room. Additional details on Physical and Digital recordkeeping procedures can be found in Applicant's *Recordkeeping Plan*.

◀ Drive 5:59 PM Fri Jul 18 12%

Books of Accounts (935 CMR 500.105(9)(e)(3))

Books of Accounts include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers.

Journals

Journals will be automatically generated through the accounting system based on the nature of the transaction. Such journals will include:

- Check register (cash disbursements and cash receipts);
- Purchases journal; and
- Sales Journal.

Ledgers

Ledgers will be generated both physically by personnel and automatically through the accounting system. Such ledgers will include:

- Vendor ledger;
- Customer ledger; and
- Inventory ledger.

Supporting documents and agreements

- Paper invoices, bills, checks, purchase or sale agreements, or other documents relating to business or financial transactions, will be scanned by the Bookkeeper to create an electronic version, which will then be saved in a computerized filed folder, properly labeled and organized;
- Such documents will also be attached to transactions through Applicant's accounting software, or a memo will be inserted in the transaction detail noting the location and file name of the scanned documents if too large to attach;
- The Bookkeeper will then place the paper document into the appropriate folder in a file cabinet containing paper records, which are properly labeled and organized for easy retrieval, if necessary; the file cabinet will be locked and stored in a secure storage area, accessible only to designated employees.
- Original versions of these business and financial records that are already in digital form, will be saved in the appropriate computerized folders.
- All digital documents will be stored and related to accounting records in the same manner as scanned paper documents; and

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- All digital documents will be properly backed-up to ensure that no records are lost permanently.

Checks

Checks shall be recorded as indicated above, and scanned copies of manual checks shall be stored and connected to the recorded transaction as applicable.

Invoices and vouchers

Invoices and vouchers, whether in paper or electronic form, shall be stored and maintained in the same manner as supporting documents and agreements.

Sales Records (935 CMR 500.105(9)(e)(4) and 935 CMR 500.140(5))

Applicant shall only utilize a point-of-sale (POS) system approved by the Commission, in consultation with the DOR. Applicant is further mindful that it may utilize a sales recording module approved by the DOR, and that it is prohibited from utilizing software or other methods to manipulate or alter sales data;

Additional procedures for recording sales will include, at a minimum:

- Sales Records will include and itemize the quantity, form, and cost of Marijuana and Marijuana Products sold; the sale dollar amount of each transaction shall be recorded initially using Applicant's point-of-sale system which will integrate with its general accounting system and in METRC;
- Procedures for conducting a monthly internal audit of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data;
- Procedures for maintaining records that it has performed the monthly audit and be able produce it to the Commission immediately upon request to the Commission, includes procedures for handling a determination that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data, which will require that Applicant:
    - o Immediately disclose the information to the Commission;
    - o Cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and
    - o Take any such other action directed by the Commission to comply with 935 CMR 500.105;
- A policy for compliance with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements;
- A policy for adopting separate accounting practices at the point-of-sale for Marijuana and Marijuana Product sales, and non-Marijuana sales; and

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BURN BRIGHT LLC
MASSACHUSETTS ADULT-USE MARIJUANA PRODUCT MANUFACTURER:
Maintaining of Financial Records

Summary Overview

In accordance with 935 CMR 500.101(1)(c)(8)(j) and 935 CMR 500.105(1)(o), Applicant submits the following summaries of policies and procedures for the maintenance of financial records and cash handling (*"Financial Recordkeeping Plan"*). The standard operating procedures (SOPs) set forth herein are designed to protect confidential financial records and valuable assets, while ensuring that Applicant is in full compliance with 935 CMR 500.000, generally accepted accounting principles, its Host Community Agreement with the City of Holyoke, and all other applicable laws, regulations, and local rules.

Key Staff

Key staff members who are responsible to implement the *Financial Recordkeeping Plan* and their specific roles therein, are as follows. A complete organizational chart may be found in Applicant's *Business Plan*.

Bookkeeper:

- Maintaining accounting records;
- Coordinating with CEO and third-party accountant;
- Together with Director of Inventory, counting cash; and

CEO:

- Together with Director of Inventory, directly overseeing Transport Agents' payment, handling, and transport of cash;

Record Keeping Team (includes VP of Operations, Inventory Manager, Director of Compliance, Director of Security, and HR Administrator under CEO oversight):

- Managing key record keeping procedures (as further described in Applicant's *Recordkeeping Plan*);

Directory of Compliance:

- Managing training and education for employees;

Financial Records Maintenance

The Bookkeeper will use an accounting software (Quickbooks or similar) to record all financial transactions. Through this accounting software, the Bookkeeper will account for and record all

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Information (CORI) report and any other background check information required by the Commission for each individual for whom Applicant seeks its registration, obtained within 30 days prior to submission of registration to the Commission, as further described in Applicant's *Qualifications and Training Plan*.

Interviews & Screenings

Pre-employment screenings by the Hiring Committee will include a review of a candidate's completed job application, resume, employment history, related experience, educational experience, a minimum of two (2) references, and results of a criminal history background check. Results of all criminal history background checks will be filed with candidate's company application. Typically, the top three (3) candidates will be selected and contacted by the Director of Operations for a telephone interview.

Applicant endeavors to encourage a diverse group of candidates to apply to its job postings, through the following actions, which are described in further detail in its *Qualifications and Training Plan*:

- Including the following statement on all job postings: *"Burn Bright LLC is a disabled veteran led company that proactively promotes diversity. Burn Bright LLC welcomes applications from members of underrepresented or minority groups. Burn Bright LLC does not discriminate on the basis of gender identity or expression; sexual orientation; religion; age; or disabilities. Discrimination on previously mentioned qualifiers is illegal;"*
- Being sensitive to, and excluding, hidden bias language in descriptions of candidate qualifications;
- Highlighting opportunities for flexible working arrangements;
- Ensuring its diversity is represented online and through published materials; and
- Working with local career development and local community advocacy organizations.

Interviewees will not be selected based on the aforementioned characteristics of underrepresented minority groups. Applicant may employ a blind-hiring, and pre-employment personality assessments, or "shortlisting" software to support a bias-free selection process. However, Applicant's commitment to building a diverse and inclusive community, free from bias, will be taken into account within the interview process.

The telephone interview will utilize standard questions, similar to below, to test the credibility of the candidate's work experience, industry and product knowledge, personality, honesty, and intelligence. Depending upon the scope of the position and the number of final candidates,

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in-person interviews will be conducted in accordance with procedures detailed in Applicant's *Qualifications and Training Plan,* until a final candidate is selected for the position.

Sample Interview Questions:

- Have you worked for a licensed/permitted medical or adult-use cannabis facility in MA or any other state?
  - For how long?
  - Describe duties and responsibilities.
  - Describe oversight.

- Have you worked in any other government-regulated industry?
  - For how long?
  - Describe duties and responsibilities.
  - Describe oversight.

Employment Offer

Once the Hiring Committee determines the best candidate for the position, a letter with an offer of employment will be sent to the candidate via email or USPS with the position description. Upon the acceptance of the employment offer, the new employee will countersign the offer of employment and begin the onboarding process.

Upon hire, new employees will receive the company's employee handbook, which will outline the Company's policies, rules, standards, and conditions of employment. The handbook will also include instructions for employees on the proper mode of notification of any pending charges or convictions, and alerting the Commission regarding any criminal actions, civil/administrative actions, professional actions, or other disciplinary actions, which may affect employment. Employees will also undergo extensive internal and "Responsible Vendor Training," as described further in Applicant's *Qualifications and Training Plan,* and otherwise mandated by 935 CMR 500.105(2)(a).

Applicant's Registration of its Company and Members

As set forth in further detail in its *Qualifications and Training Plan*, Applicant's SOP's will require every board member, director, employee, executive, manager, and volunteer ("member") associated with the facility to be over 21 years of age, not convicted of an offense involving the distribution of a controlled substance, and properly registered with the Commonwealth as a Marijuana Establishment Agent, in alignment with 935 CMR 500.030(1). Applicant will also include detailed policies and procedures for the registration of all members as Marijuana Establishment Agents.

Once the member has undergone background checks, he or she will complete the registration process for the Commonwealth, and receive their Marijuana Establishment Agent Registration Card. Applicant will always cover all fees associated with any member's agent registration process and yearly renewal. If Applicant ceases to associate with an agent, Applicant will notify the Commission within twenty-four (24) hours of termination. The employee will be removed from the Company's METRC account, keycard returns, and all access rescinded.

All members will be required to carry the registration card associated with Applicant at all times while in possession of Marijuana Products, at Applicant's facility, or transporting Marijuana Products, as required by 935 CMR 500.030(7). If there are any changes to the information submitted, or if the card is lost or stolen, Applicant must notify the commission within five (5) business days.

Revocation of a Member's Registration Card

Applicant's policies and procedures will outline the grounds for revocation of a registration card issued to agents, which follows the requirements of 935 CMR 500.032. A detailed description of grounds for Marijuana Establishment Agent Registration Card revocation can be found in Applicant's *Qualifications and Training Plan*.

Void Registration Cards

Pursuant to 935 CMR 500.033(1), a registration card issued to a member will be void when: the agent has ceased to be associated with Applicant; the card has not been surrendered upon the issuance of a new registration card based on new information; or the agent is deceased. A void registration card is inactive, as per 935 CMR 500.033(2).

Staffing Goals & Strategies

As required by 935 CMR 500.105(1)(i), Applicant has established Standard Operating Procedures for its staffing plan and generation/retention of staffing records. Staffing records, which shall be available to the Commission upon request, will include, in accordance with 935 CMR 500.105(9)(d)(3), a staffing plan that reflects accessible business hours and safe manufacturing conditions.

Applicant believes that diversity in experiences, opinions, and backgrounds is vital to its success. As such, the main goals of Applicant's staffing plan are to a) build a diverse workforce of qualified and innovative individuals; and b) offer jobs with competitive salaries and benefits that will positively affect the employment needs of the local community, which is a designated Area of Disproportionate Impact. Accordingly, Applicant will implement the following internal hiring strategies:

- Partner with local career development organizations, such as Holyoke Community College, to seek out qualified individuals;

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wage increases and the development of a personal improvement plan which will address specific areas where said employee is lacking or excelling.

Drug and Alcohol Free Workplace

As required by 935 CMR 500.105(1)(k), Applicant has adopted the following detailed written operating procedures for an alcohol, smoke, and drug-free workplace.

Applicant is committed to the elimination of drug and alcohol abuse in the workplace. An employee who is using legally prescribed medication that may impair performance is required to advise their supervisor of this and may be asked to stay home until the medicine regimen is completed. If the employee regularly takes such prescription medication, then Applicant will work with the employee to determine if the position can be modified in a way that will keep the medicated employee and work conditions safe, without detracting from the productivity and effectiveness of the position. Applicant will assist and support employees who voluntarily seek help for such problems before becoming subject to discipline and/or termination under this or other policies. Applicant considers drug and alcohol abuse a disability and will provide reasonable accommodation, including but not limited to using accrued paid time off, being placed on leaves of absence, being referred to treatment providers, and being otherwise accommodated as required by law.

In accordance with the Massachusetts Smoke-Free Workplace Law MGL c. 270 § 22, Tobacco use is prohibited in the facility. Applicant also prohibits tobacco use within fifty (50) feet of the facility. Non-compliance will result in a warning, with multiple infractions resulting in suspension or dismissal.

Violence in the Workplace

All employees, customers, vendors, business associates, and other individuals on the manufacturing facility's premises must be treated with courtesy and respect at all times. Employees are expected to refrain from conduct that may be (intentionally or negligently) dangerous to others or themselves or any other conduct that threatens, intimidates, harms, or coerces any individual. In situations of violence, Applicant encourages employees to immediately bring their disputes to the attention of their supervisors or management before the situation escalates. Applicant will make sure such disputes or issues are discussed in private and will not discipline employees for raising such concerns. Retaliation by any employee against those that raise such concerns will not be tolerated, and is grounds for dismissal. If appropriate, Applicant will always first seek peaceful resolution but, if peace is not an option, Applicant will take immediate action to remove the source of violence and danger from the workplace, with the support of the Director of Security, and if needed, local law enforcement.

Additional safeguards for handling emergency security situations, such as duress alarms and emergency procedures, are further outlined in Applicant's *Security Plan*.

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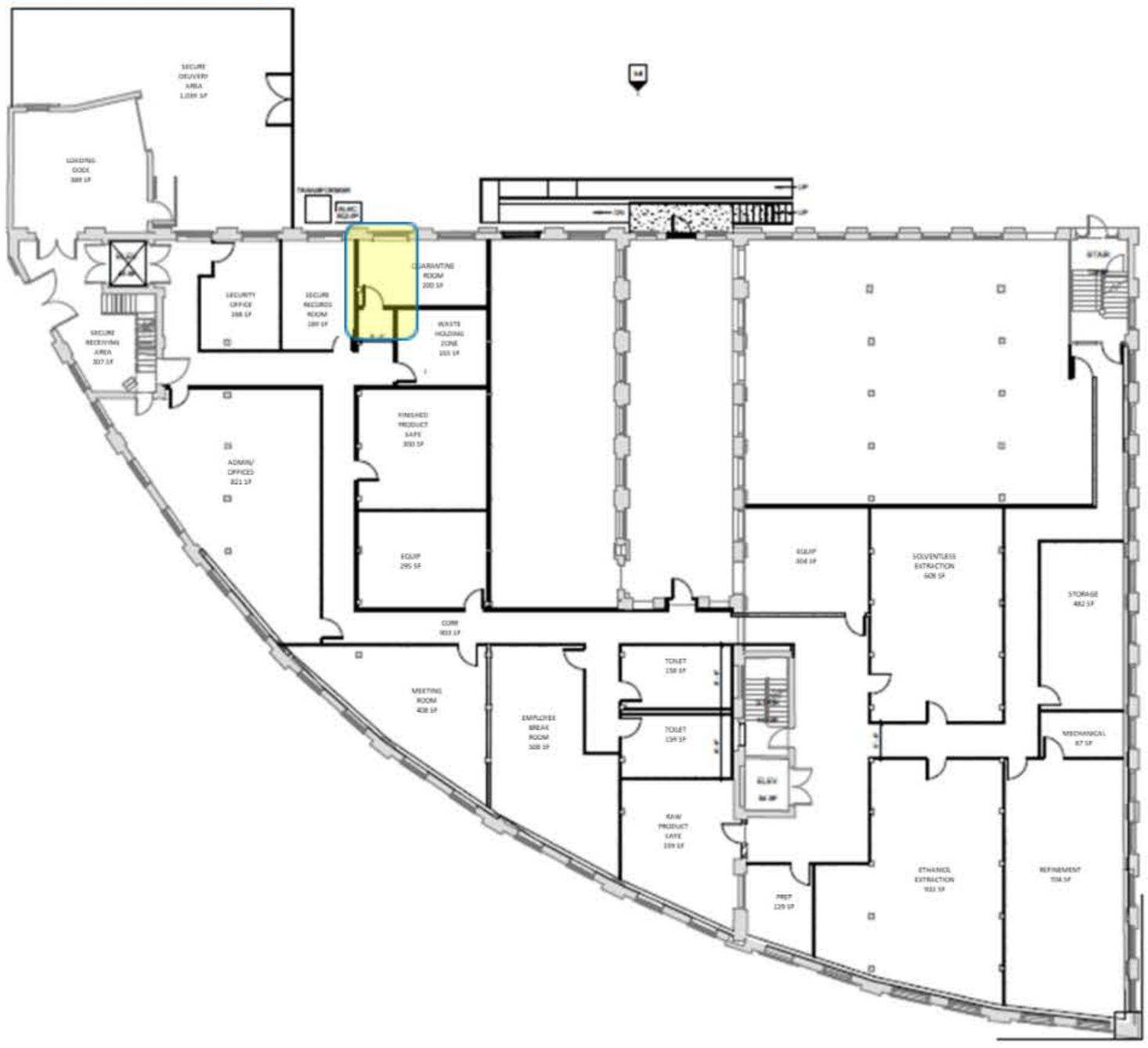
- Culture of Safety and Compliance: employees are required to comply with all State and Local Laws and will report any suspicious behavior to the Director of Operations, Director of Compliance or HR Administrator. Employees have the obligation to look out for the general health and safety of all other Team Members, and the Company as a whole. Employees shall embody a helpful attitude toward one another, and assist others when appropriate.
- Attire: each Employee must wear clean clothing appropriate for the duties he or she performs, to include, but not limited to, closed toe shoes and socks, long sleeve shirts and long pants when appropriate. Each Employee must always wear the appropriate protective apparel, such as head, face, hand and arm coverings, as necessary to protect Marijuana, ingredients, tools, and equipment from contamination.
- Personal protective equipment: Applicant will supply personal protective equipment to employees, including uniforms, scissors, respirators, and other items needed to perform regular duties. It is the responsibility of the employee to care for their PPE and keep all PPE clean, labeled, and organized. It is the responsibility of the Employee to keep all personal and general tools clean and organized at all times.
- Good hygiene: each employee will be required to practice good hygiene, such as adequate hand washing. If affected by a communicable illness or disease, employee will not be permitted to attend work.
- Crime prevention: It is of the utmost importance to take all measures to ensure the safety of the workforce. To ensure this, no contractors, vendors, or visitors are to be admitted into restricted access areas without verifying, on camera, their identity and legal status. ANY and ALL individuals on site must keep their face unobscured and recognizable. Employees are required to engage and make eye contact with all vendors and other individuals entering the facility to minimize the anonymity that is often the precursor to crimes such as robberies and theft.

Physical injuries in Marijuana Product manufacturing jobs can include, but are not limited to, back injuries from heavy lifting, cuts from working with sharp tools, and respiratory illness, for example. Applicant's primary objective is to eliminate all injuries; protect the health of its team members, partners, and patrons; and prevent or minimize any negative impact on the environment. All team members will have the responsibility to maintain the facility to the highest standards and in compliance with all Company policies, laws, and regulations. Applicant's staff will be expected to notify their department heads and the Director of Compliance immediately upon identifying any hazardous or unsafe conditions and thoroughly

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Personnel Plan Exhibit A: 2nd Floor

- Secure Records Room



Vendor-specific documents will be stored and categorized by vendor and date of record creation. Production batch records, sales receipts, shipping manifests, inventory audit reports, quarantine records, waste and destruction records, and other internal documents and files will be stored chronologically and by document type. Personnel, Human Resources, and Compliance information will be stored accordingly in a separate filing cabinet within the Secure Records Room.

Confidential physical records may be scanned as duplicate electronic files, and stored in accordance with Applicant's computerized records protocols. The employee responsible for scanning the document will also record information indicating that the document has been duplicated and stored electronically by them and on what date, by stamping the physical record

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BURN BRIGHT LLC
MASSACHUSETTS ADULT-USE MARIJUANA PRODUCT MANUFACTURER:
Personnel Policies & Background Checks

Summary Overview

As required by 935 CMR 500.101(1)(c)(8)(g), Applicant submits the following summary of personnel policies (*"Personnel Plan"*), which includes, among other things, standard operating procedures (SOPs) and information concerning the following: Employee Hiring, Staffing Goals & Strategies, Employment Policies, and Code of Conduct.

Key Staff

Key staff members who oversee personnel policies, and their specific roles therein, are as follows. A complete organizational chart is provided below.

Hiring Committee (comprised of the CEO, the Director of Operations, the HR Administrator, and one additional employee who will work closely with the newly selected employee):

- Coordinating, conducting, and assessing interviews of prospective candidates;
- Analyzing operational status and creating new roles when needed;

HR Administrator

- Communicating new job opportunities internally and through local partners;
- Conducting reference checks of prospective candidates;
- Communicating benefits;
- Overseeing work schedule changes; and
- Overseeing violations reporting.

Employee Hiring

While Applicant feels its current staffing plan, illustrated in the organizational chart below, will be adequate for operations for at least the first year, continued growth of the company will require new roles and additional personnel. For buildout of Applicant's organizational structure, the aforementioned Hiring Committee will first examine the strategic goals and fiscal health of the business relative to the need for the creation of a new employee position.

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Applicant depends upon its reputation for quality, service and integrity. Through ongoing diversity awareness and sensitivity training, employees will be trained to treat all employees, customers, visitors, and any other individual with utmost respect. Employees who conduct themselves through manipulation, commit abuse of privileged information, misrepresentation of material facts, or any other unfair business practice will be subject to discipline, including termination.

Diversity in the Workplace

Applicant's employment policies are designed to provide equal employment opportunity to all persons in a non-discriminatory, safe, healthy, and economically-beneficial working environment, and that promotes equity among minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientation, in accordance with 935 CMR 500.101(1)(c)(8)(k). To ensure all employees to respect the differences in one another's backgrounds, cultures, and beliefs, Applicant will require that each employee undergoes ongoing diversity and inclusion awareness and sensitivity training. For more information regarding Applicant's diversity policies, see its *Diversity Plan.*

Employee Standards

Employees will demonstrate the company's core values at all times while at work or while representing the company outside of work. The core values are integrity, respect, performance excellence, transparency, accountability and stewardship.

Scheduling Policies

Employees will know their schedule at least one month in advance. Employees must hand in a completely filled out employee time-off request sheet. Requests should be submitted four (4) weeks in advance to be accommodated. The time off is not guaranteed until approved by the department head. All shift swapping must be approved by the department head and both parties must confirm with the HR Administrator. Employees should arrive to work at least five (5) minutes prior to their scheduled shift in order to start work on time.

Drug-Free Policy

Applicant will not discriminate against a person in hiring, termination or imposing any term or condition of employment or otherwise penalize a person based upon a person's use of Marijuana provided that: (i) the use of Marijuana by the employee is neither in the work place during work hours, nor while the employee is performing tasks related to employment; and (ii) an employee is not impaired due to the consumption of Marijuana in the workplace or while performing tasks related to employment.

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(similar to below) or attaching a log record to it. All hard copy records, confidential or otherwise, will be kept for no less than two (2) years, unless mandated otherwise by the Commission or State government, or stated herein.

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Computerized Records

Applicant will employ METRC as the Company's inventory tracking system (ITS) along with a Commission-compliant inventory point-of-sale software, Trellis or similar.

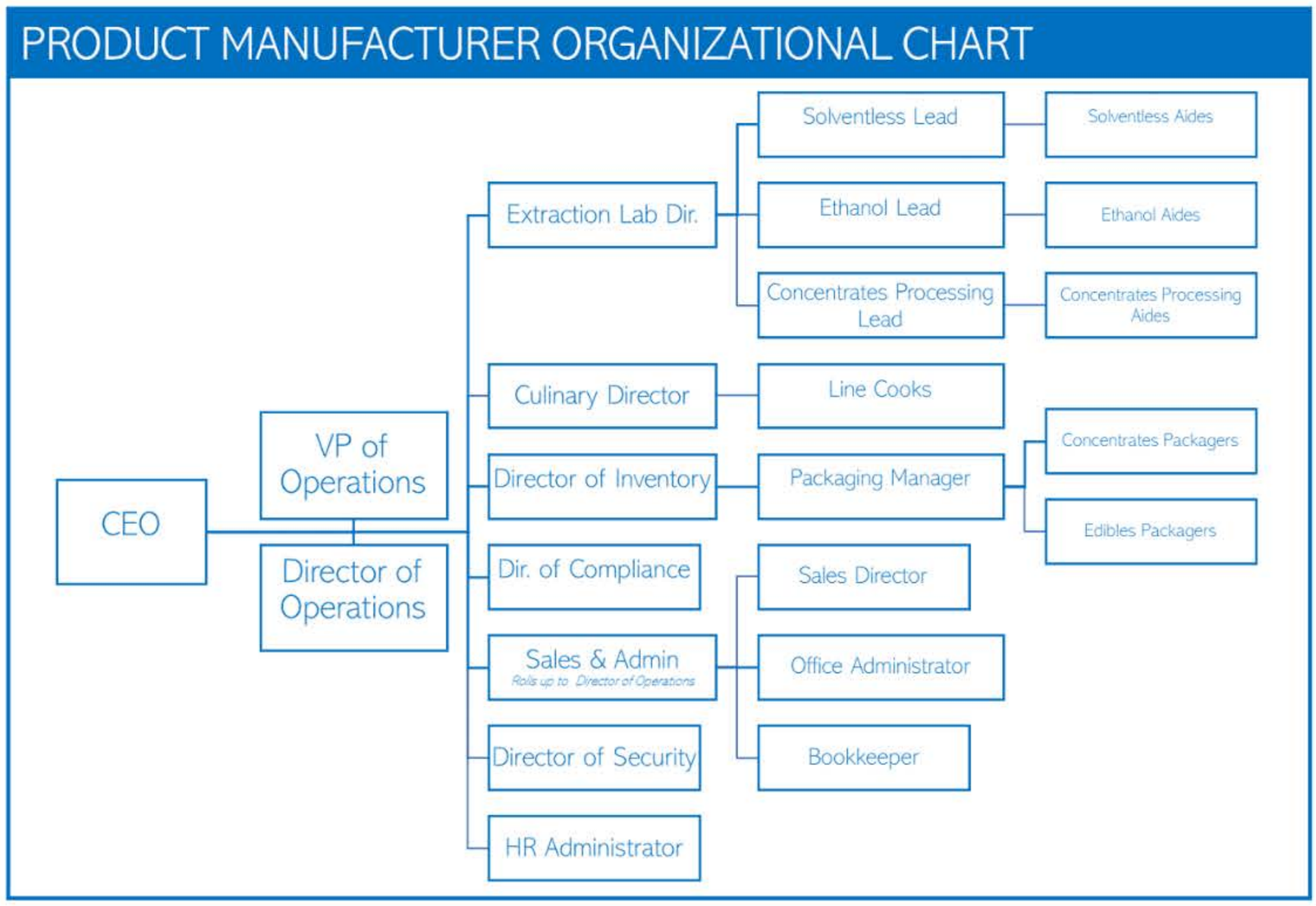
As part of its computerized recordkeeping protocol, Applicant will utilize the ITS, POS system, and accounting software, as well as an encrypted storage drive to upload and maintain digital records on the Company computer system.

All computerized records will be stored and maintained in such a way as to protect confidentiality, access to the Commission for audits, protections against unauthorized changes to data, and an audit trail to monitor all modifications to records. Caution will be taken to ensure that records and confidential information are protected and available only to authorized employees, as determined by the Director of Compliance, in order to prevent any improper disclosure, alterations, or deletions.

To safeguard confidential computerized records, Applicant will institute Internet Protocol (IP) Security. All company computers and devices will be protected with antivirus/malware software and IP scans will be conducted daily. As further described in Applicant's *Recordkeeping Plan*, computerized records will be encrypted, and only accessible by the designated Recordkeeping Team. All digital records will be kept for no less than one (1) year, unless mandated otherwise by the Commission or State government, or stated herein.

Record Requests

As required by 935 CMR 500.105(9), all records, including confidential information and any other information that may be relevant to a Commission inspection or an investigation of any incident or complaint, will promptly be made available to the Commission and when applicable, law enforcement, upon request. In accordance with 935 CMR 500.301(3), Applicant will coordinate to locate and release the information to the Commission as soon as possible but no later than the end of the business day, unless the Commission grants more time to complete the request.



If a request is made for the creation of a new position in the Marijuana Establishment, the CEO will require that the Director of Operations provide an analysis of the current state of the facility, requested competencies and skill sets, and reason for request. Upon examination of the analysis, the standing committee will approve or deny the request. If approved, a job description will be written by the HR Administrator and approved by the CEO, which will include, among other things, a summary of the suitability standards and requirements pursuant to 935 CMR 500.800 and 935 CMR 500.802.

Upon job description approval, the HR Administrator will post the notification of the new position internally and with local community partners. If needed, the HR Administrator may utilize a third-party recruitment company to find an individual with the necessary qualifications and skills. Whenever employee turnover occurs, a position analysis will be conducted to ensure that the job description is current. The job description will be revised by the HR Administrator if changes are required.

Background Checks

Each new hire will be subject to the registration requirements set forth in 935 CMR 500.030, including the compilation of background information. To this end, Applicant will require that all candidates for employment agree to an extensive background check, including a criminal background investigation, reference checks on previous employment, and verification of eligibility for lawful employment in the U.S. If a candidate refuses, he or she will be eliminated as a candidate. Further, Applicant will submit to the Commission a Criminal Offender Record

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Cause for Immediate Termination

If any Marijuana Establishment Agent is suspected of diverting cannabis, they will be suspended immediately and the Commission and law enforcement will be contacted immediately (no more than 24 hours) upon such discovery, as required by 935 CMR 500.110(8)(a)(1)-(2), pending an internal investigation.

Any Marijuana Establishment Agent that is found to have diverted Marijuana or Marijuana Products, engaged in unsafe practices, or been convicted or entered a guilty plea for a felony charge of distribution of a drug to a minor, will be immediately dismissed and reported to law enforcement officials and the Commission, as required by 935 CMR 500.105(1)(m). The Commission and local law enforcement will also be informed if Applicant discovers: 1) diversion, theft, loss, or any other criminal activity pertaining to the operations of the licensee; 2) loss or unauthorized alteration of records related to Marijuana or Marijuana Products, licensed purchasers, or Applicant's employees or agents; and 3) any other breach of security, the incidence of which may be a precursor to diversion. Applicant will provide notice to the Commission of any of these incidents within ten (10) calendar days by submitting an incident report, which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified, pursuant to 935 CMR 500.110(9)(b).

Following an investigation and completion of the corresponding incident reporting process, Applicant will adjust security protocol and/or inventory control procedures in any way deemed necessary. These records of theft or loss will be made available to the Commission and law enforcement upon request, and maintained for the duration of an open investigation and at least one (1) year thereafter, meeting and exceeding the requirements of 935 CMR 500.110(9)(c).

Wages

Beginning 1/1/2020, the minimum wage in Massachusetts is $15.00. Applicant believes it is important to offer competitive salaries in order to attract and retain talent, but also to create a corporate culture of mutual respect. Applicant believes that is vital to the success of its organization for all levels of the workforce to be duly compensated for the important work that they perform. As such, Applicant will be instituting a $17/hour minimum wage.

Employee Benefits

In addition to providing competitive salaries and other employment benefits required by law (listed under Compliance with Applicable Laws below), Applicant intends to reward its employees with other forms of compensation that increase their quality of life in a variety of ways, such as the provision of a robust benefits package. To ensure employees know and understand these benefits so that they can take full advantage of them, Applicant's HR

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Code of Conduct

Applicant will develop a code of conduct booklet intended to be a reaffirmation of the Company's commitment to ethical business conduct and the strict observance of all laws and regulations applicable to the company and its business. Though the code will not provide definitive answers to all questions about employee conduct, it will be designed to alert staff members of situations that may arise in the course of operations, how to handle them, and from who they can obtain guidance. Key sections of Applicant's code of conduct are summarized as follows.

Employment Standards

Applicant's employees will be provided a work environment that is free from risk of physical harm and work conditions where they will be fairly compensated and free from exploitation, harassment, and/or discrimination. Responsible employment practices will be followed and enforced concerning areas such as wages and benefits, working hours, child labor, forced labor, health and safety, discrimination, disciplinary actions, equal opportunity, diversity, and substance use or abuse.

Compliance with Applicable Laws

Applicant's business activities and conduct comply with all legal requirements and work environment considerations relevant to the communities in which we conduct our business, set forth below. Applicant is mindful that, under 935 CMR 500.450(3), Applicant's failure to comply with any applicable law or regulation constitutes grounds for the denial of a renewal application, or suspension or revocation of its Marijuana Establishment license.

- Massachusetts General Laws;
- American Disabilities Act;
- Holyoke ordinances;
- Massachusetts Equal Pay Act;
- Massachusetts Paid Family and Medical Leave Act;
- Massachusetts wage and overtime laws (MA minimum wage is $15.00 7/1/2025);
- Worker Adjustment and Retraining Notification (WARN) Act;
- Reasonable Accommodations (i.e. for expectant mothers, staff with disabilities, etc.); and
- Other workplace accommodations such as: vacation time; sick and small necessities leave; parental leave; voting leave; domestic violence and abusive situations leave; meals and breaks; light, ventilation, cleanliness, sanitation, and temperature; jury duty.

Fair Business Practices

- Work with local community development advocacy organizations, such as One Holyoke CDC, to educate the community about opportunities to become involved in the industry through the Company;
- Prepare job opportunity communications that are positioned to attract a diverse pool of candidates (as described under Interviews & Screenings above); and
- Employ rigorous interview and reference review protocols – as set forth in Applicant's *Qualifications and Training Plan.*

Initial team members include industry experts, such as experienced commercial cannabis cultivators and extraction technicians, operations managers, and administrative specialists, who will be responsible for assisting with the development of the facility and training new hires to fill many internal positions. With their expertise, candidates will be able to learn how to grow and process cannabis on a commercial scale, or support manufacturing through operational, administrative, and sales work.

Employment Policies

Applicant's employment policies have been developed to benefit all employees and to promote a work environment in which all employees feel that they are free to grow and develop professionally. The core of Applicant's employment policies is founded upon an emphasis on clear communication and transparency throughout the work environment. Department heads are responsible for ensuring clear communication of all responsibilities and expectations at the time the employee is hired and through continuous training and development to teach employees proper procedures, methods and techniques that will allow them to progress in their skills as a marijuana product manufacturer.

Upon hire, each employee will be provided with a copy of Applicant's employee handbook which will detail the policies, procedures, standards, and conditions of employment. Each new employee will undergo Applicant's core training program to immerse the employee in the company culture, mission, and goals of Applicant. The employee handbook will be reviewed annually and updated on a need basis. The employee handbook will encourage all agents to work together to make Applicant a viable, healthy, and a successful organization – to provide a satisfactory working environment that promotes genuine concern and respect for others.

The new hire orientation will also include an overview of the industry, company history, OSHA and safety training, Responsible Vendor Training, Food Handlers Training, as well as task specific training with direct management supervision involving a review period lasting for the first three months of full employment. At that point, an in-depth review and meeting with all associated managers will be scheduled and undertaken including the potential for merit-based

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Administrator will conduct informational sessions promptly after a new hire and will periodically draft handouts with pertinent information. The benefits package will include:

- Medical insurance which offers mental illness and other alternative coverages (i.e. acupuncture, physical therapy);
- Dental/Orthodontics insurance;
- Vision care;
- Life insurance;
- Retirement and 401k plans with corporate matching; and
- Transit benefits.

Worker's Compensation

Applicant will carry a worker's compensation insurance policy. If an employee is injured as a result of an accident or illness on the job, he or she may be eligible for Worker's Compensation benefits. The amount of benefits payable and the duration of the payment depend upon the nature of the injury or illness. Applicant is mindful that, pursuant to 935 CMR 500.450(3), failure to obtain workers' compensation insurance constitutes grounds for denial of any renewal application, suspension, and/or revocation of its Marijuana Establishment license.

Unemployment Compensation Benefits

In the event of separation from the company, employees may or may not be eligible to receive unemployment compensation benefits by applying to the Massachusetts' Department of Unemployment Assistance. Accordingly, Applicant will abide by current employment law and issue an informational notice to all separating employees advising them of their right to file a claim for unemployment insurance benefits.

Retirement and 401k Plan

Employees who have worked a minimum of twelve (12) months at the Company may be eligible to participate in an employee retirement plan, which will include a corporate matching component. Applicant's employee retirement plan will enable employees to apportion a fixed percentage of their pre-tax paycheck to a retirement fund through salary deferral. If need be, employees may access their fund before retiring; however, regulatory restrictions and penalties exist for withdrawals made prior to retirement.

Disability Coverage

Disability insurance provides partial paycheck reimbursement for times of serious illness or injury that lead to total disability. Total disability is defined as the inability to perform any job function as a result of the injury or illness. While Massachusetts does not have a disability benefits program, employees who have worked for Applicant for at least six (6) months will become eligible for short-term and long-term disability insurance coverage. To qualify for benefits, the period of total disability must exceed 15 days. Coverage extends for 45 days of

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disability. Personnel must exhaust any sick leave benefits before being eligible for disability leave coverage. Disability benefits are calculated as 60% of an employee's base salary. Any payments received from worker's compensation or state disability will result in an equal decrease in disability benefits. Disability benefits are subject to employment withholding provisions.

Educational Benefits

Each employee and member of Applicant's Management Team is required to undergo at least eight (8) hours of continuing training every year, as described in further detail in Applicant's *Qualifications and Training Plan*. The training will be technical training related to the employee's job functions, such as proper manufacturing facility sanitation for all employees or a course on cannabis business practices for members of the Management Team. If an employee wishes to pursue a course of academic study relevant to the needs of Applicant and their role within it, they may discuss this with their direct manager. If the proposed training or education is determined to be beneficial to Applicant, the Director of Operations and their direct manager will discuss providing financial support to the employee, with the approval of the CEO. All studying must be conducted in the employee's own time, but special leave may be approved for time off to study. Ultimately, this will all be at the discretion of the CEO. Such training courses may include, but are not limited to, the following.

- National Cannabis Standards Cultivation Training;
- Cannabis Extraction 101;
- Chocolate Making;
- Cannabis Breeding;
- Cannabis Science and Testing;
- Cannabis Business Marketing; and
- Cannabis Business Management.

Holidays

The company observes the following holidays. On these days, the facility will be closed.

- New Year's Day;
- Martin Luther King, Jr. Day;
- Memorial Day;
- Independence Day;
- Labor Day;
- Thanksgiving; and
- Christmas Day.

As part of Applicant's commitment to acknowledge the cultural diversity of its members, time off will also be granted to employees who desire to observe a religious holiday that is not officially recognized by the company. In accordance with Applicant's Scheduling Policies (described under Code of Conduct below), employees are asked to notify their department ahead of religious observance requests at least four (4) weeks prior to the requested time off.

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infraction occurs. Escalation may include, but is not limited to: limiting shifts or responsibilities; suspension; and termination. Management always reserves the right to deal with each employee and infraction on a case by case basis as they see the need for discernment.

Employee Warning Notice

Name	Department	
Job Title	Emp. No.	Date

Instructions: Complete this form when it is necessary to warn an employee that their performance is unacceptable. Review the report with the employee. Give a copy of the report to the employee and retain the original in the employee's file for future reference.

You are hereby notified that your performance in the following area(s) is unsatisfactory at this time. We want you to remain employed at this firm, but failure to correct deficiencies may result in termination of employment.

☐ Punctuality	☐ Job Knowledge	☐ Production	☐ Safety	☐ Completeness
☐ Attendance	☐ Job Skills	☐ Accuracy	☐ Cooperation	☐ _____
☐ Attitude	☐ Leadership	☐ Obedience	☐ Conduct	☐ _____

☐ **You are on probation for _____ days.** ☐ **You are not on probation at this time.**

Explanation and further details

Follow-up action needed

I acknowledge receipt of a copy of this warning and I ☐ agree ☐ disagree with it and state:

Employee Signature	Date
Company Name	Completed by
Title	Signature

Employee Evaluation Procedure

Employees will have the opportunity to sit down with their direct supervisor on a quarterly basis. During this quarterly meeting, employees and management will address employee performance - strengths and weaknesses - as well as how to improve moving forward. All comments will be documented on an employee performance review form and signed by employee and management. Employees may be eligible for a raise at this time depending on evaluation results. If necessary, management or employee may request a performance review outside of the quarterly time frame.

Workplace Environment

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Applicant understands that employees deserve a workplace where they are respected and appreciated. To this end, all employees must contribute to the creation of such an environment. Department heads and managers have a special responsibility to foster a workplace that supports honesty, integrity, respect, and trust; promote an environment in which all laws, regulations and policies are expected to be followed by all, and consistently enforced.

Company Assets

Applicant's facility will meet and exceed clean working conditions set forth in MGL c.149, § 113. All employees will have the duty to protect Company property and ensure cleanliness, sanitation, and organization. Employees will be taught the importance of proper handling of all equipment to prevent theft, carelessness, and waste. All employees will be required to take all reasonable measures to prevent theft of or damage to company property. Except as specifically authorized, employees will only be permitted to use Company assets, including company time, equipment, materials, resources, and proprietary information, for business purposes only.

Workplace Safety

Applicant will conduct its business operations in a manner where workplace safety is not compromised. As required by 935 CMR 500.105(1)(b), and in accordance with Massachusetts General Laws, Applicant has adopted various employee operational and security policies, including the following personal safety and crime prevention techniques. These are set forth in further detail in separate sections as noted, and described beneath.

- Safety protocols – *Production Methods Plan*:
  - Implementation of a culture of safety and compliance, based on OSHA standards;
  - Safety training;
  - Good hygiene practices;
  - Attire and personal protective equipment (PPE), including but not limited to uniforms, nitrile gloves, respirators;
- Crime prevention methods– *Security Plan:*
  - Crime prevention through environmental design;
  - Security and access control, including limited access areas; and
  - Emergency policies and procedures.

Key safety policies are as follows.

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document these instances according to Company policy and recordkeeping procedures.

Disaster/Emergency Action Plan

Applicant's *Security Plan* sets forth an Emergency Action Plan which will include contingency procedures for non-security related emergencies, such as medical emergencies, bomb threats, fires, explosions, chemical release, and weather-related disasters to ensure an appropriate and orderly response that protects the safety of its employees. The Emergency Action Plan and appropriate emergency contact numbers will be provided to all employees and posted prominently in all areas of the Facility.

Applicant will work together with the City of Holyoke Police Department, Fire Department and Emergency Services in all emergency situations, and all employees will be trained to immediately alert on-site security personnel and/or dial 9-1-1 in the event of any crimes, disturbances, medical emergencies, or any other emergency. Applicant's security personnel will be trained to respond properly to emergencies until fire, police, or medical emergency personnel arrive to take control of the situation.

Applicant's Emergency Action Plan will, at a minimum, be reviewed and updated annually after further consideration of additional technology needed, hazard assessments, and external resources available for use.

Confidential Information

Applicant's confidential information will be maintained in paper and computerized formats (as authorized by 935 CMR 500.105(9)(e)).

Physical Records

All confidential physical records will be securely stored in locked, fireproof filing cabinets in the restricted Secure Records Room, located on the Ground Floor (highlighted on floor plan below). The Secure Records Room will be subject to Applicant's Limited Access Areas protocols, as further described in its *Security Plan*.

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Anti-Retaliation Policy

Applicant will not tolerate retaliation against, or the victimization of, any staff member who raises concerns or questions regarding a potential violation of the code of conduct or any other company policy that they reasonably believe to have occurred. Retaliation will result in immediate dismissal of the offender.

Seeking Guidance

Applicant understands that regulations cannot provide detailed and definitive answers to all questions that may arise in the course of business. All employees will undergo training to prepare for instances that may occur during their daily work, but will also be encouraged to seek out guidance from supervisors should they encounter a situation to which they cannot figure out a solution.

Reporting of Violations and Investigation Framework

Employees will be advised to seek out a supervisor or management in the instance they feel a potential violation of company policy, law, or regulation is being committed. As previously stated, all employees will understand that retaliation will not be tolerated. Reports of suspected violations will be investigated promptly, using the following investigation framework to be overseen by the HR Administrator, and will be treated confidentially to the extent reasonably possible under the circumstances and in accordance with the company's legal obligations.

1. Identify the issues;
2. Determine who needs to be advised of the complaint/need to investigate;
3. Determine who should investigate;
4. Consider the timetable for investigation;
5. Consider how the investigation should be documented;
6. Identify sources of information to be reviewed;
7. Determine the order in which information should be sought;
8. Determine which witnesses to interview and topics to cover;
9. Determine who should attend the interviews;
10. Prepare a statement for the beginning of the interviews;
11. Prepare for employees who refuse to cooperate; and
12. Consider implementing temporary remedial measures while investigation is pending.

Employee Warning Procedure

If an employee commits an infraction, a manager will write them up using an Employee Warning Notice, similar to below. This sheet will be filled out by a department head and reviewed with the employee. The employee will have the opportunity to agree or disagree with the statement provided by management. Management will also review the next escalation with the employee if a repeat

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Vacations

All full and part-time employees are eligible for vacation leave benefits, as required by Massachusetts law. Full-time employees will be entitled two (2) week's annual paid vacation after their first twelve (12) months with the Company. Part-time employees working 20 to 29 hours per week will earn vacation on a prorated basis (average weekly hours/40 hours * 14 days), and can begin using them after the first twelve (12) months, though they will begin accruing on the first day of work. Employees must earn and accrue vacation benefits before they may be used. Employees should consult the HR Administrator regarding the amount of vacation leave they accrue each pay period. Vacation leave will not be earned during an unpaid leave of absence. Employees must follow the time-off request procedures within Scheduling Policies (set forth under Code of Conduct below).

Sick Leave

Situations may arise where an employee needs to take time off to address medical or other health concerns. Applicant requires employees provide notification to their supervisor as soon as possible when taking time off. Sick leave may be used for an employee's personal illness as well as medical and dental appointments, and may also be used for illness and medical appointments in the employee's immediate family.

Applicant will manage all sick leave, family leave, and disability leave in accordance with the Massachusetts Paid Family and Medical Leave program (MGL c.175M as added by St. 2018, c.121.), which became effective on October 1, 2019. Employees will be encouraged to consult the HR Administrator regarding the amount of paid leave they are entitled to in order to understand, and take advantage of, their rights under Massachusetts law.

Whistleblower Policy

Applicant's strongly values transparency and communication. As such, and though not required for private companies under Massachusetts law, Applicant has implemented a whistleblower policy designed to facilitate the spread of knowledge of wrongdoing to the appropriate parties, and to encourage transparency and communication within the organization. Applicant expects employees to observe high ethical standards in carrying out their responsibilities and to comply with all applicable laws and regulations. Senior management prefers to handle all internal issues and requires employees to bring these issues to their attention when necessary. However, it is understood that employees may feel that senior management is a part of the problem and that reporting non-compliant behavior to their supervisors and senior management would be a waste of time. In these instances, an employee may speak with HR Administrator to provide a solution.

Applicant will not tolerate retaliation against, or the victimization of, any staff member who raises concerns or questions regarding a potential violation of the code of conduct or any other company policy that they reasonably believe to have occurred. Retaliation will result in immediate dismissal of the offender.

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Applicant may enforce disciplinary action including suspension and up to dismissal if (i) an employee is unable to maintain licenses, credentials, or other qualifications that are reasonably necessary for the performance of the employee's position, even if such licensing, credentialing, or other qualifications prohibit the employee from using Marijuana; or if (ii) the employee is charged with a crime relating to his or her use, possession, sale, manufacture, distribution, dispensation, or transfer of Marijuana and, based on the employer's investigation into the matter, the employer reasonably believes the employee committed a crime.

Non-Discrimination

Consistent with MGL c.151B, § 4, Applicant will implement a zero-tolerance policy prohibiting all forms of discrimination in any business relationships, internal or external, on the basis of race, color, national origin, citizenship, religion, sexual orientation, marital status, age, mental or physical handicap or disability, veteran status, pregnancy (including lactation or the need to express breast milk for nursing a child), ancestry or any other basis prohibited by federal law or the laws of the Commonwealth, MGL c.151B. Any employees to have been found violating Applicant's zero-tolerance non-discrimination policy will be disciplined, up to and including termination.

Prohibition on Harassment

Applicant strives to create and maintain a work culture that is free of harassment of any kind, including sexual harassment. Sexual harassment is the use of sexual pressure: 1) where submission is made a term or condition of employment, 2) where submission to or rejection of such conduct is used as a basis for employment decisions, or 3) where such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, offensive or hostile work environment. Sexual pressure includes, but is not limited to, unwelcome comments, jokes or slurs of a sexual nature; unnecessary or offensive touching, impeding or blocking; offensive emails or texts of a sexual nature, or derogatory or offensive posters, cartoons, drawings, or gestures.

Other forms of harassment include, for example, written, verbal or physical conduct that degrades or shows hostility or hatred toward an individual because of his or her race, color, national origin, citizenship, religion, sexual orientation, marital status, age, mental or physical handicap or disability, Vietnam-era or disabled veteran status, any other personal characteristic, or any other basis protected by law. All harassment is subject to Applicant's zero-tolerance policy.

Plan for Obtaining Liability Insurance for Burn Bright LLC

Objective: Secure comprehensive liability insurance that protects Burn Bright LLC against potential risks associated with manufacturing and selling infused cannabis prerolls. **The policy will include general liability and product liability insurance coverage of no less than $1 million per occurrence and $2 million in aggregate annual deductible for each policy can be no higher than $5000 per occurrence 935CMR500.101 (1); 935CMR500.105(10)**

Step 1: Assess Insurance Needs

1. Identify Risks:

- Product liability: Risks associated with the consumption of infused prerolls.
- General liability: Risks related to injuries on the business premises or during distribution.
- Employee-related risks: Coverage for workplace injuries or accidents.
- Property damage: Coverage for damage to equipment or facilities.

2. Determine Coverage Types:

- General Liability Insurance: Covers claims of bodily injury, property damage, and personal injury.
- Product Liability Insurance: Protects against claims related to product defects or health issues from consumption.
- Commercial Property Insurance: Covers damage to the manufacturing facility and equipment.
- Workers' Compensation Insurance: Mandatory coverage for employee injuries.

Step 2: Research Insurance Providers

1. Identify Insurers Specializing in Cannabis Businesses:

- Look for insurance companies with experience in the cannabis industry, as they will better understand the unique risks and regulatory requirements.

- Consider companies such as:
  - Cannasure Insurance Services
  - The Hartford
  - Aon

- Hiscox
- Coverys

2. Gather Recommendations:

- Network with other cannabis businesses or industry associations for recommendations on reliable insurance providers.

Step 3: Obtain Quotes

1. Request Proposals:

- Contact multiple insurers to request quotes. Provide detailed information about Burn Bright LLC, including:

  - Business operations and products.
  - Estimated revenue and production volume.
  - Facility size and location.
  - Number of employees and safety protocols in place.

2. Compare Coverage Options:

- Review the proposals focusing on:
  - Coverage limits.
  - Premium costs.
  - Deductibles.
  - Exclusions and conditions.

Step 4: Evaluate Policies

1. Assess Coverage Adequacy:
- Ensure that the proposed policies adequately cover all identified risks and align with industry standards.

2. Review Policy Terms:
- Examine the terms and conditions, including any exclusions that may affect coverage for cannabis-related products.

3. Consult with a Broker:

- Consider hiring an insurance broker who specializes in cannabis insurance to help navigate options and negotiate terms.

Step 5: Finalize and Purchase Insurance

1. Select Provider:
   - Choose the insurance provider that offers the best value in terms of coverage and cost.

2. Negotiate Terms:
   - Discuss any potential adjustments to the policy, including coverage limits and premiums.

3. Complete Paperwork:
   - Fill out and submit all necessary documentation to finalize the insurance policy.

4. Payment:
   - Pay the initial premium to activate the coverage.

Step 6: Maintain Insurance Policy

1. Regularly Review Coverage:
   - Annually assess coverage needs and adjust policies as the business grows or changes.

2. Update Insurer on Changes:
   - Notify the insurance provider of any significant changes in operations, product offerings, or expansion plans that may affect coverage.

3. Maintain Safety Protocols:
   - Implement and uphold rigorous safety and quality control measures to minimize risks and claims.

Conclusion

Securing liability insurance is a critical step for Burn Bright LLC to protect the

business from potential risks associated with manufacturing and selling cannabis

products. By following this structured plan, we will ensure adequate coverage,

compliance, and peace of mind as we enter the Massachusetts adult-use market.

Regular reviews and updates to the insurance policy will be essential to adapt to the evolving needs of the business.

Burn Bright LLC.
POSITIVE IMPACT PLAN

I. Overview

Burn Bright LLC (Burn Bright) is dedicated to promoting participation in the regulated industry by individuals previously impacted by enforcement of drug laws. The following Positive Impact Plan(Plan) will comply with state law M.G.L. Ch. 94G §4 which requires Licensed Marijuana Establishments to,"...engage in processes and policies that promote and encourage full participation in the regulated cannabis industry by people from communities that have previously been disproportionately harmed by marijuana prohibition and enforcement and to positively impact those communities." Burn Bright is committed to making a positive impact on the city of Holyoke and has given considerable thought to the manner in which the company will

support:

1. Past or present residents of Areas of Disproportionate Impact (ADIs) defined by the Cannabis Control Commission (CCC) and identified the Guidance for Identifying ADIs;
2. Commission-designated Economic Empowerment Priority applicants;
3. Commission-designated Social Equity Program participants;
4. Massachusetts residents who have past drug convictions; and
5. Massachusetts residents with parents or spouses who have drug convictions.

This Plan describes each of Burn Bright's specific goals pertaining to positively impacting each aforementioned group, the programs Burn Bright will design and implement to ensure progress toward reaching each goal, processes for measuring progress, and finally the approach to re-evaluating and refining this Plan over time. This Plan will be overseen by Burn Bright's Chief Executive Officer (CEO), ensuring the proposed Cultivator makes a positive impact on the City of Holyoke, utilizing information provided by the CCC to identify other areas that have been impacted by cannabis prohibition and enforcement, as evidenced by each region's historical arrests, convictions, and incarceration data related to cannabis. Burn Bright's proposed location is located in Holyoke and prioritized the community of Holyoke with respect to this Plan.

II. Goals and Programming

To advance and execute upon this Plan, Burn Bright's CEO developed the following Positive Impact Goals as well as aligned Positive Impact Programming (herein "Programming"), and method(s) of measurement.

Goal 1: Job Creation and Career Advancement Opportunities

Burn Bright is committed to creating jobs in the local community and helping advance the professional careers of Disproportionately Harmed People within Holyoke. To further this mission, Burn Bright will develop an internal program called Holyoke First, which mandates that the Leadership Team and those responsible for recruitment and hiring decisions prioritize hiring individuals from within the boundaries of Holyoke. This initiative places special emphasis on Holyoke residents with past drug convictions, as well as those who have parents or spouses with similar convictions, aiming to maintain at least 10% of our staff as Holyoke residents who have been affected by past drug convictions. We will offer education and

support regarding sealing criminal records to help reduce barriers to entry in the cannabis industry. By focusing on hiring local employees, we not only bring individuals into the workforce who possess a deep understanding of the community's needs and culture, but we also enhance customer relationships and business operations while strengthening community ties. This creates a supportive network of opportunity that benefits everyone involved. Furthermore, by keeping money circulating within the area and supporting small businesses, Burn Bright contributes to fostering economic stability. Additionally, hiring locally reduces commuting times, leading to a better work-life balance and a smaller environmental footprint.

Program 1: Job Fairs in Holyoke

Burn Bright will host or participate in two (2) job fairs per year in Holyoke with a focus on recruiting and hiring individuals who live in Holyoke, an identified ADI. Burn Bright will make efforts to work directly with the City of Holyoke, the Office of Economic Development, and local organizations within Holyoke to advertise open positions to Disproportionately Harmed People. Job fairs may be held both in-person and/or virtually and will be advertised via Facebook and local job boards.

Program 2: Professional Development Training

Burn Bright will provide at least 5 hours of professional development training per quarter to aforementioned individuals to develop cross-functional skills that translate to other future employment opportunities. Professional development training will include, but is not limited to attending cannabis conferences and engaging with third-party education series facilitated in-person or online.Burn Bright will encourage employees to submit professional development opportunities to the Leadership Team for review and if approved, Burn Bright will cover expenses related to external trainings. The CEO will maintain a Personal Development Plan for each employee to review with their supervisor at the end of each quarter.

Goal 2: Provide Mentorship Opportunities

Burn Bright will provide industry-specific training to at least four (4) **each year (12 calendar months)** individuals who identify as: Past or present residents of the geographic ADI, which have been defined by the Commission and identified in its Guidance for Identifying Areas of Disproportionate Impact; Commission-designated Economic Empowerment Priority applicants; Commission-designated Social Equity Program participants; Massachusetts residents who have past drug convictions; and/or Massachusetts residents with parents or spouses who have drug convictions. Burn Bright recognizes attracting and retaining a diverse pool of talented people across all levels of the organization is essential to the overall success of the Company. Burn Bright will build a workplace culture that is safe, welcoming, inclusive, and affirming to its employees and partners, regardless of age, gender, disability, race, religion, sexual orientation, or any other factor. **Mentorship program will be for a duration of two weeks, held annually onsite at Burn Brights facility in Holyoke, Ma.**

Applicant selection

2. Documentation of the number of job fairs Burn Bright participated in and how many applicants are residents of ADI Holyoke.
3. Documentation of communication with the Office of Economic Development partnering in strategies for hiring individuals from Holyoke.
4. Providing reports measuring the effectiveness of our Mentorship program and number of individuals engaged in the program.

The Leadership Team will conduct quarterly meetings to review the Company's progress toward meeting and exceeding established positive impact goals, and will discuss and implement any improvements to this Plan. The Leadership Team will meet to discuss overall Company recruitment efforts; pursued and missed positive impact opportunities; individual employee and team performance; team morale; attrition or growth rates; and any comments or concerns relating to this Plan that have been shared with leadership.

Upon receipt of Burn Bright's Final License from the Cannabis Control Commission (CCC) to operate a marijuana establishment in Massachusetts, Burn Bright will begin to utilize the proposed measurements to assess its Plan and will account for demonstrating proof of success or progress of the Plan upon the yearly renewal of the license. The CEO will review and evaluate Burn Bright's measurable outcomes no less than quarterly to ensure that Burn Bright is meeting its commitments. Burn Bright is mindful that demonstration of the Plan's progress and success will be submitted to the CCC upon renewal.

IV. Acknowledgments

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

To effectively search for and choose individuals for the Burn Bright Mentorship Program, the applicant plans to implement a multifaceted approach:

1. Outreach and Awareness: The applicant will utilize social media platforms, local community boards, and cannabis industry events to promote the program. By engaging with local cannabis clubs, health and wellness organizations, and educational institutions, they aim to reach a diverse pool of potential mentees.

2. Application Process: Interested individuals will be invited to submit applications that include their background, interest in cannabis cultivation, and specific goals they hope to achieve through the mentorship. This process will ensure that applicants are genuinely motivated and have a clear understanding of what the program entails.

3. Interviews and Selection Criteria: The applicant plans to conduct interviews with shortlisted candidates to assess their enthusiasm, commitment, and suitability for the program. Key selection criteria will include prior experience in horticulture or a related field, a passion for learning about cannabis, and a willingness to comply with legal regulations.

4. Diversity and Inclusion: The selection process will focus on ensuring a diverse group of mentees, prioritizing individuals from underrepresented communities in the cannabis industry. This commitment aligns with Burn Bright's mission to promote inclusivity within the sector.

5. Mentorship Pairing: Once selected, the mentees will be paired with the Head Grower and other experienced professionals based on their specific interests and career goals. This personalized approach aims to enhance the learning experience and provide tailored guidance.

By following this structured plan, the applicant aims to create a robust mentorship program that not only educates but also empowers individuals within the cannabis industry.

III. Measurements

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

1. Documenting that applicants for mentorship are the target group
    a. Past or present residents of the geographic ADI, which have been defined by the Commission and identified in its Guidance for Identifying Areas of Disproportionate Impact.
    b. Commission-designated Economic Empowerment Priority applicants;
    c. Commission-designated Social Equity Program participants;
    d. Massachusetts residents who have past drug convictions; and
    e. Massachusetts residents with parents or spouses who have drug convictions

Plan to remain compliant

The City of Holyoke mandates that all cannabis establishments in Holyoke, Massachusetts, obtain a Special Permit through the City Clerk. This permit is crucial for ensuring compliance with both local ordinances and the regulations set forth by the Cannabis Control Commission (CCC).

Key aspects concerning the updated plan for licensees and the associated local licensing requirements in Holyoke:

1. Special Permit Application Process and Local Requirements:

Review of Holyoke Bylaws: Licensees must thoroughly review Holyoke Bylaws Section 7.10 (Marijuana Facilities) and Section 10-1 (Major Site Plan Review) which detail the rules and requirements for cannabis establishments and the Special Permit process.

2. Architectural and Site Plan Development: Licensees must submit a floor plan stamped by a professional architect and a site plan stamped by a surveyor/site engineer. The site plan should include details such as parking, boundaries, and curb cuts.

4. Pre-Application Review: A pre-application meeting with City departments is required to discuss the floor plan, site plan, and operational aspects like parking, odor control, and fire suppression.

5. Development Impact Statement: Licensees must prepare a "Development Impact Statement" outlining their plans and project, adhering to the guidelines in Holyoke Bylaw Section 10.1.6.

6. Zoning Regulations: Holyoke's Code of Ordinances, specifically Appendix A Section 7.10.4, outlines the zoning regulations for adult use marijuana facilities

Employee Training

Applicant believes it is imperative that all employees are provided with ample training and resources to successfully learn and implement company policies and standard operating procedures, all of which will take local, state, and federal regulations into account. All training sessions will include diversity and inclusion, and general sensitivity, awareness components.

By ensuring employee training is extensive and all operations are conducted through a lens of compliance, Applicant will not only benefit from a well-trained staff, it will become eligible to become an industry Compliance Leader in the state of Massachusetts, as per 935 CMR 500.040(1)(d), the consideration of which will be taken by the Commission in assessing any fines and disciplinary actions against Applicant respectively, under 935 CMR 500.360 and 935 CMR 500.450. To this end, Applicant will strive to meet the following criteria, promulgated in 935 CMR 500.040(3)(d):

- In the year preceding the date of application for a leadership rating:
    a. All Licensee employees will complete all required trainings for their positions within 90 days of hire;
    b. The Licensee will not be issued a written deficiency statement;
    c. The Licensee will not be the subject of a Cease and Desist order or a Quarantine order;
    d. The Licensee will not have its license suspended; and
    e. The Licensee will meet all timelines required by the Commission.

As such, Applicant will provide each of the resources outlined below to all staff members. The new hire orientation process will also include task-specific training with direct management supervision involving a review period lasting for the first three months of full employment.

Employee Handbooks

Applicant is committed to conducting business with compliance at the forefront of every process. As such, Applicant recognizes the value in ensuring that its business and employees are protected by all pertinent federal and state labor laws.

Applicant will work with an expert HR compliance firm to further develop HR standard operating procedures (SOPs) for its facility. This includes the development of a state-compliant employee handbook, which will include extensive information regarding company employment policies and guidelines. This includes Applicant's policies on non-discrimination, sexual harassment, and drug and alcohol use, at a minimum. A current digital version of the employee handbook will be shared with all new employees. It will be regularly reviewed and updated as needed. Updated versions of the document will be provided to all staff members as necessary.

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Employees will be expected to read through the employee handbook and sign an attestation, indicating they've been provided with ample time to review it, have been given the opportunity to ask questions, and they assume responsibility for the information contained in the document.

Written Standard Operating Procedures

New employees will be required to read and learn Applicant's detailed SOPs. A current digital version will be available in a shared folder at all times. All changes to SOPs will be tracked and staff will be promptly retrained via the methods outlined below. In addition to the training requirements outlined below, staff members will be required to review written SOPs annually at a minimum. Employees will be required to sign an attestation each time they read through SOPs in their entirety, indicating that they read the document, were provided ample opportunity to ask questions, and that they understand the information shared in the document.

Consistent with 935 CMR 500.105(1), each new hire will, in their training, receive SOPs for the following actions:

- Hours of Operation
    a. A description of the facility's hours of operation;
    b. A description of after-hours contact information; and
    c. Both will be provided to the Commission, made available to Law Enforcement officials upon request, and updated pursuant to 935 CMR 500.000.

- Staffing Plan
    a. Procedures for maintaining compliance with 935 CMR 500.105(9); and
    b. Procedures for maintaining staffing records in compliance with 935 CMR 500.105(9).

- Board Member Statement
    a. A policy which states that a list of all board members and executives of the business, and members, if any, of the Licensee will be made available upon request by any individual; and
    b. This requirement will be fulfilled by placing the information on the business' website.

- Alcohol, smoke, and drug-free workplace policies

- Product Descriptions
    a. To describe the Marijuana to be processed; and

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- Positively identifying individuals:
    - Who are seeking access to the premises; and
    - To whom or Marijuana Products are being transported pursuant to 935 CMR 500.105(13); and Limiting access solely to individuals 21 years of age or older;

vii. Preventing Loitering on the Premises;

viii. Waste Disposal Procedures;
- Disposing of Marijuana in accordance with 935 CMR 500.105(12); and
- Prohibition of waste disposal in excess of the quantity required for normal, efficient operation as established within 935 CMR 500.105;

ix. Cash Handling Procedures;
- Policies and procedures for the safe handling of cash on the premises including but not limited to storage, collection frequency, and transport to financial institution(s).

x. Preventing Diversion to Minors;
- Policies and procedures to prevent the diversion of Marijuana to individuals younger than 21 years old, including best practices.

xi. Additional Measures;
- Securing all entrances to prevent unauthorized access;
- Keeping all locks and security equipment in good working order;
- Prohibiting keys, if any, from being left in the locks or stored or placed in a location accessible to persons other than specifically authorized personnel;
- Prohibiting accessibility of security measures, such as combination numbers, passwords or electronic

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current perspective. Reference checks will be conducted by the HR Administrator. Protocol includes:

- The HR Administrator must be familiar with all application materials for each top candidate, including information that was provided in the interview;
- If a work sample was provided by the candidate, at least one reference check question must be designed to verify the sample;
- Additional Questions asked of the reference may be based upon the need for additional elaboration or confirmation of the information the candidate provided in their application materials;
- All reference checks shall be conducted by telephone;
- The HR Administrator must attempt to conduct a reference check with a minimum of (2) individuals who hold different types of relationships with the candidate;
- Upon making contact with each reference, the HR Administrator shall describe the position, its duties and expectations, and the working environment of the role for which the individual has applied;
- After describing the role, the HR Administrator shall ask the reference to provide an assessment of how effective they believe the individual will be in that role; and
- The HR Administrator shall then ask a series of follow-up questions, which will be determined based on the reference's initial assessment.

If the reference does not provide sufficient information in their answer, the HR Administrator shall ask for additional information.

- For example, if the reference's response is, "They'll do great!" the HR Administrator's response should be along the lines of, "Can you please explain the reason for your answer? What attributes and skills does the applicant have to meet the expectations of the role?"

Additional questions will be asked about the conditions under which employment was severed and any other questions pertinent to the verification of the candidate's application materials.

As described in greater detail below, Applicant will have a zero-tolerance policy against discrimination in all forms. As such, the HR Administrator will be trained to identify and avoid asking illegal or inappropriate questions that have to do with race, color, gender, national origin, citizenship, religion, sexual orientation, marital or familial status, age, mental or physical handicap or disability, veteran status, or any other basis prohibited by federal and the laws of the Commonwealth.

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- Not have been convicted of an offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of Other Jurisdictions (as per 935 CMR 500.030(1)(b)); and
- Be determined suitable for registration consistent with the provisions of 935 CMR 500.800 and 935 CMR 500.801 or 935 CMR 500.802 (as per 935 CMR 500.030(1)(c)).

In accordance with 935 CMR 500.030(2)(a)-(h), applications for registration of a Marijuana Establishment Agent will include:

- The full name, date of birth, and address of the individual;
- All aliases used previously or currently in use by the individual, including maiden name, if any;
- A copy of the applicant's driver's license, government-issued identification card, liquor purchase identification card issued pursuant to M.G.L. c. 138, § 34B, or other verifiable identity document acceptable to the Commission;
- An attestation that the individual will not engage in the diversion of Marijuana products;
- Written acknowledgment by the applicant of any limitations on his or her authorization to prepare, process, package, possess, transport, and dispense Marijuana and Marijuana Products in the Commonwealth;
- Background information, including, as applicable:
    a. A description and the relevant dates of any criminal action under the laws of the Commonwealth, or another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority, whether for a felony or misdemeanor and which resulted in conviction, or guilty plea, or plea of *nolo contendere*, or admission of sufficient facts;
    b. A description and the relevant dates of any civil or administrative action under the laws of the Commonwealth, another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority relating to any professional or occupational or fraudulent practices;
    c. A description and relevant dates of any past or pending denial, suspension, or revocation of a license or registration, or the denial of a renewal of a license or registration, for any type of business or profession, by any federal, state, or local government, or any foreign jurisdiction;
    d. A description and relevant dates of any past discipline by, or a pending disciplinary action or unresolved complaint by, the Commonwealth, or a like action or complaint by another state, the

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BURN BRIGHT LLC
MASSACHUSETTS ADULT-USE MARIJUANA PRODUCT MANUFACTURER:
Qualifications and Training

Summary Overview

In accordance with 935 CMR 500.101(1)(c)(9) and 935 CMR 500.105(1)(i), Applicant submits the following description of qualifications and intended trainings for Marijuana Establishment Agents who will be employees (*"Qualifications and Training Plan"*). This plan defines staff employment qualification requirements and identifies the training resources committed to deliver desired operational results within Applicant's organization, namely, the production of consistent, quality, and safe products for consumers. The employee training and onboarding process is key to achieve these results, as not only must Applicant identify the staff needed to achieve its assertive financial goals, each individual must be effectively trained to facilitate its standard operations with compliance at the forefront within its facility.

Key Staff

Key staff members who participate are responsible to implement the *Qualifications and Training Plan* and their specific roles are as follows. A complete organizational chart may be found in Applicant's *Business Plan*.

Hiring Committee (comprised of the CEO, the Director of Operations, the HR Administrator, and one additional employee who will work closely with the newly selected employee):

- Coordinating, conducting, and assessing interviews of prospective candidates; and

HR Administrator

- Conducting reference checks of prospective candidates.

Qualifications for Employment

Applicant is committed to identifying and hiring a diverse, highly qualified team, ensuring the efficacy of its operations and safety of its workplace, with a culture of compliance threaded throughout. Prior to employment, each prospective employee will be required to meet a series of stringent qualifications developed internally, which are designed to meet and exceed all Commission requirements and to identify a qualified and talented pool of candidates. A comprehensive list of operational roles and their descriptions can be found in Applicant's *Production Methods Plan*.

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In order to maintain consistency and fairness, the HR Administrator will ask the same basic questions within each Reference Check.

Drug-Free Workplace Policy/Required Testing

Consistent with the requirements of 935 CMR 500.105(1)(k), and as described below, Applicant will implement an alcohol, smoke, and drug-free workplace policy.

To this end, Applicant will explicitly prohibit:

- The use, possession, solicitation for, or sale of narcotics or other illegal drugs, alcohol, cannabis, or prescriptions on company premises or while performing an assignment;
- Being impaired or under the influence of legal or illegal drugs, cannabis, or alcohol away from the company premises, if such impairment or influence adversely affects the employee's work performance, the safety of the employee or of others, or puts Applicant's reputation at risk;
- Possession, use, solicitation for, or sale of legal or illegal drugs, cannabis, or alcohol away from company premises, if such activity or involvement adversely affects the employee's work performance, the safety of the employee or of others, or puts Applicant's reputation at risk; and
- The presence of any detectable amount of prohibited substances in the employee's system while at work, while on the premises of the company or while on company business. "Prohibited substances" include illegal drugs, cannabis, alcohol, or prescription drugs not taken in accordance with a prescription given to the employee.

Applicant may conduct drug and/or alcohol testing under any of the following circumstances:

Qualification Testing

Certain prospective employees, such as Transport Agents or those operating heavy machinery or equipment, will be required to submit to and pass non-THC drug screening. Failure to pass this screening process will result in a status of "not employable" within the organization.

For-Cause Testing

Applicant may ask an employee to submit to a drug and/or alcohol test at any time it has reason to believe that the employee may be under the influence of drugs or alcohol, including, but not limited to, the following circumstances: evidence of drugs or alcohol on or about the employee's person or in the employee's vicinity, unusual conduct on the

United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority with regard to any professional license or registration held by the applicant;

e. A nonrefundable application fee paid by Applicant with which the Marijuana Establishment Agent will be associated; and
f. Any other information required by the Commission.

In addition to the aforementioned items, consistent with 935 CMR 500.030(3), an executive of the Applicant registered with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: *iCORI Registration*, will submit a Criminal Offender Record Information (CORI) report for the agent, obtained within 30 days prior to submission, as well as any other background check information that may be required by the Commission.

Under 935 CMR 500.030(5), Registration Cards are valid for one year from the date of issue and renewable on an annual basis (provided continued suitability, as determined by the Commission). As such, Applicant will track employee Registration Cards and each issue date to ensure each is renewed on time annually. Employees who are not deemed suitable for registration renewal by the Commission will be subject to immediate employment termination.

As required by 935 CMR 500.030(6), if Applicant becomes aware that there are any changes to the information that was previously submitted to the Commission to obtain a required Registration Card or if a Registration Card is lost or stolen, it will report such incident to the Commission, in a form and manner determined by the Commission, as soon as possible, but in any event, within (5) business days.

As per 935 CMR 500.030(4), if employment is terminated for any individual or if the individual ceases to be associated with the establishment for any reason, including death, Applicant will notify the Commission no more than one business day after the agent ceases to be associated with the establishment, which will immediately void the registration.

As required by 935 CMR 500.030(7), employees will be required to carry their assigned Registration Card, associated with Applicant's establishment, at all times while working, particularly while in possession of Marijuana Products, including at all times while at the establishment or while transporting Marijuana Products. To this end, employees will be instructed to place it in a company-approved transparent badge holder, directly behind company-issued Employee Identification Badges, which will be worn visible and above the waste at all times while individual is in the facility or while transporting Marijuana Products. Applicant is mindful that under 935 CMR 500.030(8), an employee who already has a Marijuana Establishment Agent Registration Card associated with one or more different Marijuana Establishment(s) is required to be issued a registration for each establishment.

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- Any other breach of security;

ii. A manager must within (10) calendar days, provide notice to the Commission of any incident described in 935 CMR 500.110(9)(b) by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate Law Enforcement Authorities were notified;

iii. All incident documentation that is reportable pursuant to 935 CMR 500.110(9)(c) must:
   - Be maintained by the facility for not less than one year or the duration of an open investigation, whichever is longer; and
   - Be made available to the Commission and Law Enforcement Authorities upon request;

iv. Code of conduct violations reporting will:
   - State that there is no tolerance of retaliation against or the victimization of any staff member who raises concerns or questions regarding a potential violation of the code of conduct or any other company policy that they reasonably believe to have occurred; and retaliation will result in immediate dismissal;
   - Encourage employees to seek out guidance from their supervisors or HR Administrator should they encounter a situation to which they cannot figure out a solution; and
   - Provide a framework for investigations.

d. Security Audits

i. The business will, on an annual basis, obtain at its own expense, a security system audit by a vendor approved by the Commission;

ii. A report of such audit will be submitted, in a form and manner determined by the Commission, no later than thirty (30) calendar days after the audit is conducted; and

iii. If the audit identifies concerns related to the establishment's security system, the business will also submit a plan to mitigate those concerns within ten (10) business days of submitting the audit.

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iv. Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants.

Manufacturing

Consistent with 935 CMR 500.130(5), in addition to the content outlined above, the Marijuana Product Manufacturing Facility will provide the following written Standard Operating Procedures to employees:

- Policies and procedures for the production or distribution of Marijuana Products, as applicable, which will include, but not be limited to:
    a. Methods for identifying, recording, and reporting diversion, theft, or loss, and for correcting all errors and inaccuracies in inventories;
    b. these policies and procedures, at a minimum, will be in compliance with 935 CMR 500.105(8);
- Policies and procedures for handling voluntary and mandatory recalls of Marijuana or Marijuana Products. These procedures will:
    a. Be adequate to deal with recalls due to any action initiated at the request or order of the Commission;
    b. Include any voluntary action by the business to remove defective or potentially defective Marijuana or Mariuana Products from the market, as well as any action undertaken to promote public health and safety;
- Policies and procedures for ensuring that any outdated, damaged, deteriorated, mislabeled, or contaminated Marijuana or Marijuana Products is segregated from other product and destroyed. These procedures will:
    a. Provide for written documentation of the disposition of the Marijuana or Marijuana Products;
    b. At a minimum, be in compliance with 935 CMR 500.105(12);
- Policies and procedures for transportation. These policies and procedures, at a minimum, will be in compliance with 935 CMR 500.105(13);
- Policies and procedures to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts. These policies and procedures, at a minimum, will be in compliance with 935 CMR 500.105(15);
- Policies and procedures for the transfer, acquisition, or sale of Marijuana or Marijuana Products between Marijuana Establishments.

Workflow Tools

In order to ensure the staff performs duties as assigned according to the written SOPs outlined above, each will utilize a series of workflow tools that provide step-by-step guidance. A failure to perform duties as assigned and track them will result in disciplinary action. Workflow tools will be immediately updated to account for any changes to SOPs and as mentioned above, staff will be promptly retrained on updated procedures.

Responsible Vendor Training

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xi. Managers must maintain a current list of authorized employees and service personnel that have access to the surveillance room that is available to the Commission upon request;

xii. The surveillance room will remain locked and will not be used for any other function;

xiii. All security equipment must:

- Be in good working order; and
- Be inspected and tested at regular intervals, not to exceed (30) calendar days from the previous inspection and test;

xiv. Trees, bushes and other foliage outside of the facility will be maintained so as to prevent a person or persons from concealing themselves from sight;

c. Incident Reporting

i. In accordance with 935 CMR 500.110(9)(a), a manager must notify appropriate Law Enforcement Authorities and the Commission of any breach of security immediately and, in no instance, more than (24) hours following discovery of the breach during the following occasions at a minimum:

- Discovery of discrepancies identified during inventory;
- Diversion, theft or loss of any Marijuana or Marijuana Product;
- Any criminal action involving or occurring on or in the facility premises; any suspicious act involving the sale, manufacture, distribution, processing or production of Marijuana or Marijuana Products by any person;
- Unauthorized destruction of Marijuana or Marijuana Products;
- Any loss or unauthorized alteration of records related to Marijuana or Marijuana Products;
- An alarm activation or other event that requires response by public safety personnel or security personnel privately engaged by the business;
- The failure of any security alarm system due to a loss of electrical power or mechanical malfunction that is expected to last more than eight hours; or

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- Employee Safety
    a. Identifying Facility Hazards; and
    b. Mitigating Facility Hazards.

- Emergency Procedures
    a. Including a disaster plan with procedures to be followed in case of:
        i. A medical emergency;
        ii. A fire;
        iii. A chemical spill;
        iv. Extreme weather events;
        v. A threatening event including:
            - An armed robbery; or
            - A burglary;
        vi. Any other criminal incident.

- Labeling and Packaging, including Warning Symbols

- Product Transfers/Transportation
    a. Originating Party;
    b. Receiving Party; and
    c. Transportation Requirements.

- Efficiency and Conservation Strategies
    a. Policies and procedures for energy efficiency and conservation that will include:
        i. Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;
        ii. Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on the site, and an explanation of why the identified opportunities were not pursued, if applicable;
        iii. Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and

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In furtherance of the requirement to ensure that all Marijuana Establishment Agents complete training prior to performing job functions, including, at a minimum, "Responsible Vendor Training," under 935 CMR 500.105(2)(a) Applicant has already signed a Letter of Intent to work with industry experts at Cannabis Trainers (attached hereto) to supply Commission-accredited Sell-SMaRT™ Responsible Vendor Employee Regulatory Compliance training to staff. To this end, in compliance with 935 CMR 500.105(2)(b), staff will participate in a customized private class in order to provide training on specific company policies and procedures. This program will meet all standards described in 935 CMR 500.105(2)(b)(6), and class curriculum will consist of all subjects described in 935 CMR 500.105(2)(b)(7), together with any areas of training determined by the Commission to be included in a Responsible Vendor training program. This includes a five (5) hour course that covers the following topics:

<u>Section I ~ The Legal Information</u>

- Key state laws and rules affecting owners, managers, and employees;
- Local Codes & Regulations;
    a. Local and state licensing and enforcement;
    b. Incident and notification requirements
    c. Conduct of establishment;
    d. Administrative and criminal liability;
    e. License sanctions and court sanctions;
    f. Permitted hours of sale;
    g. Prohibited purchases and practices;
    h. Maintenance of records; and
    i. Licensee responsibilities for activities occurring within licensed premises; and
- Compliance Checks;
    a. Permitting inspections by state and local licensing and enforcement authorities.

<u>Section II ~ Safety & Security</u>

- Awareness of Property;
- Health and Safety Standards;
- Proper Containers, Packaging & Labeling;
- Restricted Areas;
- Privacy Issues;
- Security/Cameras;
- Disposing of Waste; and
- Inventory Tracking & Safe Receiving Compliance;
    a. Diversion prevention and prevention of sales to minors, including best practices; and

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b. Compliance with all tracking requirements.

Section III ~ Checking ID's

- Verification of IDs;
    a. Acceptable forms of identification;
    b. How to check identification; and
    c. Common mistakes made in verification;
- Minor IDs;
- Fake or Altered IDs;
    a. Spotting false identification; and
    b. Provisions for confiscating fraudulent identifications.

Section IV ~ Handling Tricky Situations

- Handling Consumption on Property;
- Refusing a Sale;
- Dealing with People Visibly Impaired or Intoxicated;
    a. Visible signs of impairment; and
    b. Recognizing the signs of impairment.
- Handling Potential Violence;
- Patrons Prohibited from Bringing Marijuana or Marijuana Products onto Licensed Premises; and
- Incident and Notification Requirements.

Section V ~ Consumer Safety & Education

- Supporting & Guiding Patients (yet not giving medical advice);
- Educating Consumers;
- Encouraging Responsible Consumption;
- Various Consumption Methods (Edibles, Flower, Concentrates, Topicals, etc.);
    a. Discussion concerning Marijuana's effect on the human body;
    b. Marijuana's physical effects based on type of Marijuana Product;
    c. The amount of time to feel impairment;
    d. Visible signs of impairment; and
    e. recognizing the signs of impairment.

As per 935 CMR 500.105(2)(b)(1)-(2), all owners, managers and employees that are involved in the handling and sale of Marijuana or Marijuana Products will be required to attend and successfully complete the Sell-SMaRT™ Responsible Vendor program. within 90 days of hire in order to maintain "Responsible Vendor" status. Applicant will also ensure each respective staff member subsequently completes the program annually in order to further maintain "Responsible Vendor" status. Those administrative employees who do not handle or sell Marijuana or

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received said training and the topics discussed, including the name and title of presenters and the presenter's signature at a minimum.

External vendors that Applicant may work with to conduct additional trainings, are as follows:

- *Trellis*: A Commission-validated seed-to-sale software that Applicant may use, who provide systems training for their clients' staff;
- *Americans for Safe Access*: An organization that advocates for safe and legal access to cannabis for therapeutic uses and research, who provide online modules for National Cannabis Standards Training for Processing Operations, and Patient Focused Certification Training, among others;
- *Clover Leaf University*: An accredited university that provides stand-alone technical and career advancement courses and certifications for the cannabis industry, such as Chemistry for Hash Makers, Infused Laboratories – Cannabis Extractions, and Cannabis Culinary Certifications, among others; and
- *Holyoke Community College*: A local college that has recently launched a cannabis workforce training program in partnership with the Cannabis Community Care and Research Network, that also offers OSHA Certification courses among other comprehensive entry-level courses.

Ongoing Employee Training

All personnel will receive ongoing training to ensure that operational changes are promptly and effectively communicated. Ongoing training will also ensure the maintenance of the skills required to perform tasks according to the standard operating procedures supplied by Applicant. Ongoing training will be conducted annually and at any time when SOPs are altered. At a minimum, each staff member will receive eight (8) hours of annual ongoing training. As with all other training activities, ongoing training will be tracked and documented as outlined above.

Training Curriculum Audits

All forms of training materials will be regularly audited by the management team once per quarter to ensure they remain current and effective. This process will be tracked on a Training Audit and Adjustment Log and will include a review of all disciplinary actions taken against employees to identify areas where training must be improved. In situations where facility operations must be updated immediately, such as an internal inventory discrepancy event, the identifying party will initiate the process by notifying the HR Administrator of the required change in writing, at which point the HR Administrator will obtain additional information and directive from the Extraction Lab Director and/or Culinary Director. In addition, each form of training will be promptly updated to account for regulatory changes.

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- Registration Card Requirements
  Suitability Standards according to Facility Type.

- Inventory Management
  a. Industry Chain of Custody;
  b. Seed-to-Sale Tracking; and
  c. Inventory Management Best Practices.

- Consumer, Product, and Public Safety
  a. Employee Hygiene/Sanitary Practices;
  b. Facility Sanitation;
  c. Product Storage Requirements;
  d. Waste Disposal;
  e. Quality Control Plans;
  f. Testing Requirements;
     i. Testing for contaminants in compliance with 935 CMR 500.160;
  g. Product Recalls;

  h. Edibles Requirements
     i. Prohibited Shapes;
     ii. Single Serving Doses – maximum 5mg active THC;
     iii. Package Dose Max - 100 mg active THC; and
     iv. Homogeneity requirements.

- Security
  a. Facility Safety Measures;
     i. Employee Safety Measures;
        - Personal Safety; and
        - Crime Prevention Techniques;
     ii. Employee Identification Badges;
        - Issued by the Marijuana Establishment;
        - Must be worn at all times while in the facility or transporting Marijuana; and
        - Must be visible at all times;
  iii. Facility Diagram Requirements;
        - Must be filed with the Commission; and
        - The facility diagram must include:
            - Limited Access Areas;
            - Entrances and exits;
            - Walls and partitions; and

the plans or procedures are modified in a material way.

b. Security and Alarm Requirements for Enclosed Areas;

i. Must be adequate to prevent and detect diversion, theft or loss of Marijuana or Marijuana Products, or unauthorized intrusion;

ii. Must consist of commercial-grade equipment including:

- A perimeter alarm on all building entry and exit points and perimeter windows;
- A failure notification system that provides an audible, text or visual notification of any failure in the surveillance system;
- The failure notification system must provide an alert to designated employees of the Marijuana Establishment within five minutes after the failure, either by telephone, email or text message; and
- A duress alarm, panic alarm or hold-up alarm connected to local public safety or Law Enforcement Authorities;

iii. Video cameras that are placed:

- In all areas that may contain Marijuana or Marijuana Products;
- At all points of entry and exit; and
- In all parking lots, which includes adequate lighting for surveillance;

iv. Cameras that are directed at:

- All safes, vaults, sales areas; and
- Areas where Marijuana is received, processed, prepared, stored, handled or dispensed;

v. Cameras that are angled so as to allow for the capture of clear and certain identification of any person entering or exiting the Marijuana Establishment or area;

vi. Recordings must:

- Include 24-(4) hour recordings from all video cameras;
- Be available for immediate viewing by the Commission upon request;
- Be retained for at least 90 calendar days;
- Not be destroyed or altered; and

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- Be retained as long as necessary if the Marijuana Establishment is aware of a pending criminal, civil or administrative investigation or legal proceeding for which the recording may contain relevant information;

vii. The surveillance system must have:
- The ability to immediately produce a clear, color still phone whether live or recorded;
- A date and time stamp embedded in all recordings, which shall be synchronized and set correctly at all times and shall not significantly obscure the picture;
- The ability to remain operational during a power outage;
- A video recording that allows for the exporting of still images in an industry standard image format, including .jpg, .bmp and .gif;
- Exported video that has the ability to be archived in a proprietary format that ensures authentication of the video and guarantees that no alternation of the recorded image has taken place; and
- Exported video that has the ability to be saved in an industry standard file format that may be played on a standard computer operating system;

viii. Employees must ensure that all recordings are erased or destroyed prior to disposal;

ix. The security system equipment and recordings must:
- Be maintained in a secure location so as to prevent theft, loss, destruction and alterations; and
- Have a back-up alarm system, with all the capabilities of the primary system, provided by a company supplying commercial grade equipment, which is not the same company supplying the primary security system;

x. Access to surveillance areas will be limited to:
- Persons that are essential to surveillance operations;
- Law Enforcement Authorities;
- Security system service personnel; and
- The Commission;

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- Vegetation, flowering, processing, and production, storage, disposal and retail sales areas;

iv. Limited Access Areas;

- Pursuant to 935 CMR 500.110(4);
- Restricting Access to:
  - Employees, agents or volunteers specifically permitted by the Marijuana Establishment;
  - Agents of the Commission;
  - State and local Law Enforcement and emergency personnel;
  - Only specifically authorized personnel;
  - Only the minimum number of employees essential for efficient operation;
- Required Limited Access Area Signage
  - Minimum of 12" x 12";
  - States: "Do Not Enter—Limited Access Area—Access and "Limited to Authorized Personnel Only"; and
  - Lettering no smaller than one inch in height;

v. Visitor Requirements;

- Includes all outside vendors, contractors;
- Visitors must obtain a visitor identification badge prior to entering a limited access area;
- Visitors must be escorted at all times by a Marijuana Establishment Agent authorized to enter the Limited Access Area;
- Visitor identification badge must be visibly displayed at all times while the visitor is in any Limited Access Area;
- Visitors must be logged in and out;
- Visitor log must be available for inspection by the Commission at all times; and
- All visitor identification badges must be returned to the Marijuana Establishment upon exit;

vi. Visitor and Vendor Procedures;

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or biometric security systems, to persons other than specifically authorized personnel;

- Ensuring that the outside perimeter of the Marijuana Establishment is sufficiently lit to facilitate surveillance, where applicable;
- Ensuring that all Marijuana Products are kept out of plain sight and are not visible from a public place without the use of binoculars, optical aids or aircraft;
- Required buffer zones from public or private schools;
    - Measures to deter and prevent unauthorized entrance into areas containing Marijuana;
    - Measures to deter and prevent theft of Marijuana:
        - Storing all Marijuana in compliance with 935 CMR 500.105(11);
        - Storing all finished Marijuana Products in a secure, locked safe or vault in such a manner as to prevent diversion, theft, and loss; and
        - Keeping all safes, vaults, and any other equipment or areas used for the production, processing or storage of Marijuana Products securely locked and protected from entry, except for the actual time required to remove or replace Marijuana or Marijuana Products;
    - Emergency policies and procedures for securing all product following any instance of diversion, theft or loss of Marijuana or Marijuana Products, and conduct an assessment to determine whether additional safeguards are necessary; and
    - Sharing the Marijuana Establishment's security plan and procedures with Law Enforcement Authorities and fire services and periodically updating Law Enforcement Authorities and fire services if

Marijuana Products may take the "Responsible Vendor" training on a voluntary basis, under 935 CMR 500.105(2)(b)(4).

Applicant will maintain records of Responsible Vendor training program compliance for four (4) years and will make all such records available to inspection by the Commission and any other applicable licensing authority upon request during normal business hours, meeting the requirements of 935 CMR 500.105(2)(b)(5).

ServSafe Training

Applicant intends to work with industry experts at Cannabis Trainers to supply ServSafe® Food Handler training to any new staff member who participates in the production of Edible Marijuana Products. The curriculum includes a (3.5) hour course that blends the latest Food Code, food safety research, and years of food sanitation training experience. Participants will also explore best practices with regard to general food safety information that is relevant to working in licensed extraction labs and kitchens working with cannabis. Applicant will also ensure each respective staff member subsequently completes the program every (5) years in order to maintain certification.

Applicant will maintain records of ServSafe training (4) years and will make all such records to inspection by the Commission and any other applicable licensing authority upon request during normal business hours.

In accordance with 935 CMR 500.130(5)(g) this program will include training on preparation, handling, and storage of all Edible Marijuana Products to ensure that all manufacturing activities are in compliance with the sanitation requirements in 105 CMR 590.000: State Sanitary Code Chapter X: Minimum Sanitation Standards for Food Establishments, and with the requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements.

Additional Staff Training

All company standard operating procedures that are not covered in the Responsible Vendor and ServSafe training programs will be supplied internally, with the exception of those listed below, which Applicant may implement through external vendors. Training curriculum will be tailored to the roles and responsibilities of the job function of each respective employee, as per 935 CMR 500.105(2). Each new employee will receive extensive training that will include demonstration by a manager who will then supervise as the trainee performs the same until each is confident that the skills have been well-learned. Employees will be required to pass a quiz and sign an attestation, indicating they were provided ample opportunity to ask questions and they fully understand the material, at which point they will be allowed to perform respective duties as assigned. The attestation or signed statement will include the date, time, and place he or she

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Staffing and Training Recordkeeping

As mentioned above, all personnel records will be kept confidential and maintained as part of the business' books and records. All personnel records will be kept for at least twelve (12) months after termination of the individual's affiliation with the business. All personnel records as well as staffing and training documentation will become part of the business' books and records will be available for inspection by the Commission in a form and location acceptable to the Commission.

In addition to the Employment Qualification documents indicated above, staffing and training records will also include the following at a minimum:

- A staffing plan that demonstrates:
    a. Accessible business hours; and
    b. Safe manufacturing conditions;
- A personnel record for each staff member, which will include the following at a minimum, as referenced above.
- All versions of employee handbooks, which includes:
    a. Documentation of all personnel policies and procedures; and
    b. Employee attestations;
- All versions of written Standard Operating Procedures as required by 935 CMR 500.105(1). This includes at a minimum:
    a. Tracking documentation of SOP changes;
    b. Tracking documentation indicating that staff was retrained on new procedures; and
    c. Employee attestations; and
- All workflow documentation and records.

Applicant is committed to the prompt and effective communication of important information to its personnel. Applicant believes that the best way to achieve compliance and maintain public safety is to ensure that staff members are provided with abundant and comprehensive training resources while maintaining transparent and compliant books and records.

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Under 935 CMR 500.031(1)-(6), grounds for the denial of a registration include: (i) failure to provide the information required in, or otherwise meet the requirements of 935 CMR 500.030; (ii) provision of misleading, incorrect, false or fraudulent information on the application; (iii) revocation or suspension of a Registration Card in the previous six (6) months; (iv) failure by Applicant to pay all applicable fees; and (v) any other grounds as the Commission may determine in its discretion that are directly related to the applicant's ability to serve as an agent or that make the applicant unsuitable for registration, together with notice and a reasonable opportunity to cure those grounds.

Employees whose Marijuana Establishment Agent Registration Card is revoked by the Commission for any reason will be subject to immediate employment termination. Under 935 CMR 500.032, grounds for revocation reasons include, but are not limited to:

- Submission of information that is deceptive, misleading, incorrect, false or fraudulent, or that tends to deceive or create a misleading impression, whether directly, or by omission or ambiguity, in the application or renewal application;
- Violation of the requirements of the state Marijuana Laws, including 935 CMR 500.000;
- Fraudulent use of a Marijuana Establishment Agent Registration Card, including but not limited to tampering, falsifying, altering, modifying, duplicating, or allowing another person to use, tamper, falsify, alter, modify, or duplicate a Marijuana Establishment Agent Registration Card;
- Selling, distributing, or giving Marijuana to any unauthorized person;
- Failure to notify the Commission within five business days after becoming aware that the Registration Card has been lost, stolen, or destroyed;
- Failure to notify the Commission within five business days after a change in the registration information contained in the application or required by the Commission to have been submitted in connection with the application for a Marijuana Establishment Agent Registration Card, including open investigations or pending actions as delineated in 935 CMR 500.802, as applicable, that may otherwise affect the status of the suitability for registration of the Marijuana Establishment Agent;
- Conviction, guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of any Other Jurisdiction;
- Conviction, guilty plea, plea of *nolo contendere* or admission to sufficient facts in the Commonwealth, or a like violation of the laws of another state, to an offense as delineated in 935 CMR 500.802 (suitability

standards) that may otherwise affect the status of the suitability for registration of the Marijuana Establishment Agent; or

- Other grounds as the Commission may determine in the exercise of its discretion, that are directly related to the individual's ability to serve as a Marijuana Establishment Agent, that make the registrant unsuitable for registration.

Background Check Monitoring

Under 935 CMR 500.101(1)(b), executives, managers, persons or entities having direct or indirect authority over the management, policies, security operations or manufacturing operations including all candidates for employment, must undergo a background check, and submit authorization to obtain a full set of fingerprints, in accordance with M.G.L. c. 94G, § 21, submitted in a form and manner as determined by the Commission.

When deemed necessary, Applicant will monitor employees with periodic re-screening to ensure they have not been charged with or convicted of any offence or occurrence that may compromise their ability to maintain eligibility for employment or undermine Applicant's trust in their ability to have access to physical or virtual Marijuana. Employees will be required to report any such occurrences to the business within (24) hours. Failure to report will result in immediate termination of employment. If Applicant becomes aware that there are any changes to the information that was previously submitted to the Commission to obtain a required Registration Card, it will report such incidence to the Commission, in a form and manner determined by the Commission, as soon as possible, but in any event, within (5) business days.

Additional Employee Qualifications

Additional content regarding detailed qualifications for each specific job description are covered in Applicant's *Production Methods Plan.*

Employment Qualification Recordkeeping

Meeting and exceeding the requirements of 935 CMR 500.105(9)(d) (and as also spelled out in Applicant's *Recordkeeping Plan*), all personnel records, including, without limitation, job descriptions for each employee and volunteer position, organizational charts consistent with the job descriptions, staffing plans (which demonstrate accessible business hours and safe manufacturing conditions, personnel policies and procedures, and all background check reports complied in accordance with 935 CMR 500.030) will be kept confidential and maintained as part of the business' books and records. Such documentation will be kept for at least twelve (12) months after termination of the individual's affiliation with the Marijuana Establishment, as per 935 CMR 500.105(9)(d)(2), and will be available for inspection by the Commission and any other relevant regulatory agencies in a form and location acceptable to the Commission.

Personnel records for each agent will include:

- The employee's Pre-Employment Attestation;
- All interview documentation;
- Documentation of verification of references;
- The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
- Documentation of all required training, including raining 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;
- Notice of completed Responsible Vendor and eight(8)-hour related duty training
- All drug test results, if applicable;
- Documentation of periodic performance evaluations;
- A record of any disciplinary action taken;
- All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
- All background check reports obtained in accordance with 935 CMR 500.030; and
- All related documentation.

Employee Onboarding

Once the official offer of employment has been made and accepted, the HR Administrator will utilize a series of onboarding tracking checklists to ensure no steps are missed throughout the onboarding and training processes. The initial onboarding tracking form will include the following items at a minimum:

- The collection and archiving of required employee documents and identification to verify the lawful employment of each individual;
- The creation of various employee accounts such as access to the seed-to-sale tracking system with appropriate permissions provided;
- The provision of employee documents such as the employee handbook, Standard Operating Procedures, and Workflow Tools; and
- The maintenance of employee training tracking documents including a signed statement or attestation 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 and the presenter's signature at a minimum.

The entire onboarding process must be completed before the employee is eligible to begin performing work at the facility on behalf of the Applicant.

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b. The form(s) in which Marijuana and Marijuana Products will be sold.

- Cause for Termination Policies
  Includes a policy for the immediate dismissal of any Marijuana Establishment Agent who has:
  a. Diverted Marijuana, which shall be reported to Law Enforcement officials and to the Commission;
  b. Engaged in unsafe practices with regard to operation of the business, which shall be reported to the Commission;
  c. Been convicted or entered a guilty plea, plea of *nolo contendere*, or
     admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority; or
  d. Engaged in prohibited retaliation activities.

- General Compliance
  a. Defining Various Regulatory Bodies;
  b. Facility Inspections;
  c. State vs. Municipal Requirements;
  d. How to Proceed when Regulations Differ;
  e. Mitigating Liability;
  f. Consumer Complaints;
  g. Penalties;
     i. Deficiency Statements;
     ii. Plans of Correction;
     iii. Fines;
     iv. License Suspensions;
     v. License Revocation;
     vi. Summary Cease and Desist/Quarantine Orders; or
     vii. Hearings;
  h. Reporting Requirements;
  i. Advertising Requirements;
  j. Required Books and Records;
  k. Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9); and
  l. A plan describing how confidential information will be maintained;

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trimming). Applicant will also ensure to, in photographs and video online and through published materials, reflect the diversity of the current staff.

Applicant has also made a commitment in its Host Community Agreement, a designated Area of Disproportionate Impact, to make every good faith effort to hire from within Holyoke first; to this end, Applicant will work with local employment advocacy organizations, such as One Holyoke CDC, to inform and engage the local community regarding employment opportunities. Applicant will also communicate employment opportunities through advocacy groups like Casa Latina Inc., and advertise in publications that appeal to a diverse readership, such as The Rainbow Times.

Interviewees will not be selected based on the aforementioned characteristics of underrepresented minority groups. Applicant may employ a blind-hiring, and pre-employment personality assessments, or "shortlisting" software to support a bias-free selection process. However, Applicant's commitment to building a diverse and inclusive community, free from bias, will be taken into account within the interview process.

Applicant believes that these approaches will encourage individuals from underrepresented communities to apply, boosting recruitment from a diverse pool of candidates, resulting in a more qualified and innovative workforce.

Interviewing Protocol

The Hiring Committee will consist of the CEO, the Director of Operations, the HR Administrator, and one additional employee who will work closely with the newly selected employee. Specifically, the Hiring Committee will:

- Develop interview questions and their order for all of the applicants;
- Determine which committee member will ask specific questions;
- Determine if other requirements must be met by applicants, such as the provision of work samples or participation in skills testing;
- Determine a scoring protocol and creates effective interviewing forms to be used in the interview process; and
- Conduct interviews.

Once the interviewing process has been completed, the Hiring Committee will meet to discuss the results and choose the top (3) candidates, based upon interview scoring. The HR Administrator will then conduct reference checks on each top candidate to ensure the information provided by each is accurate.

Reference Checks

Reference checks will be conducted before an official offer of employment is made. An effort will be made to speak with the candidate's most recent supervisor if possible, in order to gain a

employee's part that suggests impairment or influence of drugs or alcohol, negative performance patterns, or excessive and unexplained absenteeism or tardiness.

Post-Accident Testing

Any employee involved in an on-the-job accident or injury under circumstances that suggest possible use or influence of drugs or alcohol in the accident or injury event may be asked to submit to a drug and/or alcohol test. "Involved in an on-the-job accident or injury" means not only the one who was or could have been injured, but also any employee who potentially contributed to the accident or injury event in any way.

If an employee is tested for drugs or alcohol outside of the employment context and the results indicate a violation of this policy, or if an employee refuses a request to submit to testing under this policy, the employee may be subject to appropriate disciplinary action up to and possibly including discharge from employment. In such a case, the employee will be given an opportunity to explain the circumstances prior to any final employment action becoming effective. In consideration thereof, Applicant will:

- Through training, give employees tools to recognize substance abuse issues;
- Through training, fight substance abuse head on, and offer employees the help that they may need to fight addiction;
- Offer assessment, counseling, referrals to rehabilitation facilities, counselors, etc. (subject to ongoing assessments and proper documentation); and
- Be aware federal ADA laws on substance abuse, and treat substance abuse issues as a disability.

Marijuana Establishment Agent Registration Cards

Applicant is mindful that it is required to apply for the registration for all board members, directors, employees, executives, managers, and volunteers who are associated with its establishment, under 935 CMR 500.030(1). Accordingly, once a candidate has been selected for employment and has met all of the aforementioned qualification requirements. Applicant will obtain respective Marijuana Establishment Agent Registration Cards from the Commission. Applicant will apply and pay for registration on behalf of the employee (as per 935 CMR 500.030(2)(g)). Employees will not receive authorization to work until the Commission has issued a Registration Card, determining the individual is suitable for registration.

All eligible individuals shall:

- Be 21 years of age or older (as per 935 CMR 500.030(1)(a));

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Pre-Employment Attestations

Along with a cover letter and resume, each candidate applying for employment with Applicant's facility will be required to provide to Applicant, a signed attestation, indicating that they have reviewed the Commission-mandated criteria to receive a Marijuana Establishment Agent Registration Card and representing that they are eligible to receive this document from the Commission.

Applicant will provide in all job postings, a list of criteria and an Attestation Form for ease of reference and use. Prospective employees who do not meet this primary qualification will be assigned a status of "not employable" within the organization, ensuring valuable company resources are not expended on individuals who are ineligible for employment.

Interviews

Interviews are often the single most important step in the personnel selection process. Applicant will appoint a "Hiring Committee" (described in detail below), the members of which will have the opportunity to, among other things, interview prospective hires, ask all required and relevant questions and interface directly with each candidate, to determine whether or not they are a good fit for the company. Also, during these interviews, prospective employees will have the opportunity to learn about Applicant and its company culture. By following company interviewing guidelines, the Hiring Committee will be able to facilitate the interview process in a strategic and fair manner.

The Hiring Committee will select interviewees from a pool of candidates who meet and exceed all job position requirements. Applicant is committed to being an agent of positive change, and seeks to ensure that, through its staffing plans, it contributes to the diversification of the cannabis industry to adequately represent the Commonwealth's multicultural society, and consistent with the social interest policies underlying enactment of the Regulation and Taxation of Marijuana Act (St. 2016, c. 334, as amended by St. 2017, c. 55, An Act to Ensure Safe Access to Marijuana).

Simply valuing diversity is not enough. Accordingly, all job postings will include the following; *"Burn Bright LLC is a disabled veteran led company that proactively promotes diversity. Burn Bright LLC welcomes applications from members of underrepresented or minority groups. Burn Bright LLC does not discriminate on the basis of gender identity or expression; sexual orientation; religion; age; or disabilities. Discrimination on previously mentioned qualifiers is illegal."* Applicant will also be sensitive to, and endeavor to exclude, hidden bias language in descriptions of qualifications, such as "collaborative" or "dominating", which are implicitly directed at female and male candidates respectively. Applicant will also highlight opportunities for flexible working, when available, such as "work from home" arrangements (for non-operational roles, such as marketing or sales) or flexible hours (for part-time roles, such as

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BURN BRIGHT LLC
MASSACHUSETTS ADULT-USE MARIJUANA PRODUCT MANUFACTURER:
Quality Control and Testing

Summary Overview

As required by 935 CMR 500.101(1)(c)(8)(f), Applicant submits the following detailed summary of operating policies and procedures for quality control and testing of product for potential contaminants (*"Quality Control Plan"*). This section will review Applicant's quality control and testing procedures, including rigorous internal manufacturing program policies and procedures for quality control and quality assurance, as well as third-party testing for contaminants. All standard operating procedures (SOPs) governing quality control and assurance have been written in accordance with 935 CMR 500.105(1)(h), 935 CMR 500.105(3), and 935 CMR 500.160.

Key Staff

Key staff members who are responsible to implement the *Quality Control Plan* are as follows. A complete organizational chart may be found in Applicant's *Business Plan*.

Directory of Operations:

- Ensuring that strict sanitary handling protocols are complied with by all staff who directly come in contact with Marijuana;
- Overseeing quality control and testing procedures;
- Overseeing Extraction Lab Director in execution of extraction SOPs;
- Overseeing Culinary Director in execution of kitchen SOPs;
- Together with Director of Inventory, coordinating transfer of Marijuana and Marijuana Products for testing;

Directory of Inventory:

- Overseeing execution of relevant storage, inventory, and transportation procedures;
- Together with Director of Compliance, supervising Packaging Manager to ensure required information is disclosed on all finished product labels; and

Directory of Compliance:

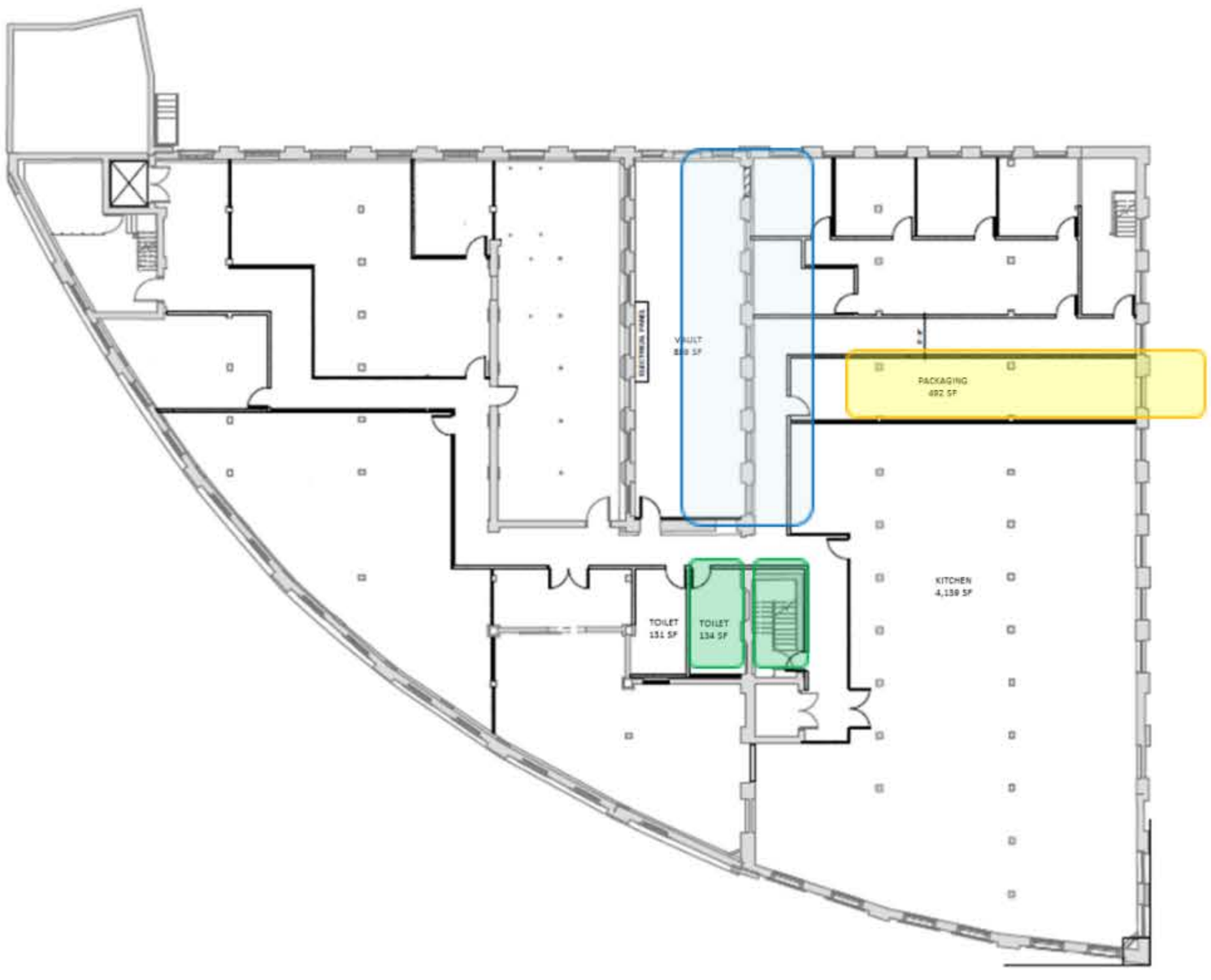
- Managing training and education for employees.

Facility Overview

Site plans of all levels of the facility are provided below, and identify key areas relevant to the Handling section of this *Quality Control Plan*.

Quality Control Plan Exhibit A: 2nd floor

- Packaging Room
- Vault
- Toilet Facilities incl. Hand Washing Area



Quality Control Plan Exhibit B: 2nd floor

- Finished Product Safe
- Raw Product Safe
- Security Office
- Secure Delivery Area
- Employee Break Room incl. Handwashing Area
- Toilet Facilities incl. Handwashing Area



Quality Control

To ensure that the Marijuana Products manufactured by Applicant meet both the Commission's and Consumer demands for clean, quality products, Applicant has adopted a series of quality control measures that meet and exceed the requirements set forth in the Act. To this end, Applicant will employ an petroleum-free extraction program and sustainability-focused culinary program, to be rigorously Once the Cultivation Batch has been approved for sale by an

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information on Applicant's policies for safeguarding the community through appropriate handling of Marijuana, Marijuana Products, and other ingredients, can be found in its *Production Methods Plan, Storage Plan, Diversion Prevention Plan, and Personnel Plan.*

Independent Lab Testing

In accordance with 935 CMR 500.105(8)(f), Applicant, a proposed adult-use Marijuana Product Manufacturer will not use any Marijuana, or sell or otherwise market for adult use any Marijuana Product, that has not first been tested by Independent Testing Laboratories. All Marijuana Products that are awaiting testing will be stored in a segregated section of the Vault marked, "Awaiting Testing, Do Not Dispense".

As required by 935 CMR 500.160(1) and (9) Applicant will not use any Marijuana, and not sell or market for adult-use sale, any Marijuana or Marijuana Product that is not capable of being tested by Independent Testing Laboratories and otherwise deemed to comply with 935 CMR 500.160.

To this end, Applicant has entered into a Testing Agreement with MCR Labs. MCR Labs is an Independent Testing Laboratory registered by the Department. At a minimum, and as required by 935 CMR 500.160(1)-(2), such testing will be performed in compliance with a protocol(s) established in accordance with M.G.L. c. 94G, § 15 and in a form and manner determined by the Commission including, but not limited to, the the *Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products*. This will include, but is not limited to:

- Cannabinoid profile;
- Contaminants as specified by the Commission, such as:
  - Residual solvents;
  - Heavy metals;
  - Pesticides residues and plant growth regulators (pesticides are prohibited);
  - Mold and mildew; and
  - Microbiological contaminants and mycotoxins.

Relevant test results included on product labels, as required by 935 CMR 500.105(5), will disclose, among other things, a list of ingredients, including the full cannabinoid profile of the Marijuana contained within the Marijuana Product, including the amount of delta-nine tetrahydrocannabinol (Δ9-THC) and other cannabinoids in the package and in each serving of a Marijuana Product as expressed in absolute terms and as a percentage of volume; and a statement and a seal 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. The Packaging Manager, under oversight of the Director of Inventory, will ensure that all final products are labeled

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appropriately. More information on Applicant's policies and procedures for labeling can be found in its *Branding and Packaging Plan*.

As defined under 935 CMR 500.002 for Independent Testing Labs, Applicant will ensure that, throughout the term of its Agreement with MCR, MCR remains licensed by the Commission and (a) is accredited to the International Organization for Standardization 17025 (ISO/IEC 17025 2017) by an accrediting body that is a signatory to the International Laboratory Accreditation Accrediting Cooperation mutual recognition arrangement or that is otherwise approved by the Commission; (b) independent financially from any Medical Marijuana Treatment Center, Marijuana Establishment, or licensee for which it conducts a test; and (c) qualified to test cannabis or Marijuana in compliance with 935 CMR 500.160 and M.G.L. c. 94C § 34.

Applicant will only work with an Independent Testing Laboratory that has the ability to store all Marijuana and Marijuana Products on its premises in compliance with 935 CMR 500.105(11), as required by 935 CMR 500.160(8). Applicant is mindful that any excess Marijuana and Marijuana Products provided to an Independent Testing Laboratory for testing by Applicant will be disposed of by the Independent Testing Laboratory or returned to Applicant for disposal, as required by 935 CMR 500.160(9).

As required by 935 CMR 500.160(3), in instances when independent testing lab results show contaminants above acceptable limits established in Department protocols, Applicant will adhere to the following written policy:

> In instances where independent testing lab results show contaminants above acceptable limits established in the Commission protocols identified in 935 CMR 500.160(1), the Director of Compliance will directly notify the Cannabis Control Commission within 72 hours of any lab results indicating that the contaminant cannot be remediated. The notification will include a proposed plan of action for both the destruction and disposal of contaminated product as well as an assessment of the source of contamination and will be from both Applicant and the Third Party Testing Laboratory, separately and directly.

In accordance with 935 CMR 500.160(11), Applicant is mindful that single-servings of Marijuana Products tested for potency in accordance with 935 CMR 500.150(4)(a) shall be subject to a potency variance of no greater than plus/minus ten percent (+/- 10%).

As required by 935 CMR 500.160(4), Applicant will maintain the results of all testing for no less than one (1) year.

In as much as the product(s) being tested will be transported to an Independent Testing Laboratory (that is off-site), as required by 935 CMR 500.160(7), the foregoing testing

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protocols will occur under the auspices of Applicant's *Transportation Plan*, which is written in full compliance with 935 CMR 500.105(13).

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Independent Testing Lab, it will be reweighed in the Vault and rerecorded in METRC. Once it has been reweighed, it will be transferred to the Packaging Room to be sorted according to its intended Processing Category, described below, and assigned Production Batch identification numbers, which are recorded in METRC. Applicant will assign and record a unique, sequential alphanumeric identifier to each Production Batch for the purposes of production tracking, product labeling and product recalls. All Production Batches shall be traceable to one or more Cultivation Batches implemented by a well-trained manufacturing teams, which Applicant believes will deliver the highest quality Marijuana Products to consumers.

Applicant will develop highly-controlled SOPs to cover all of the following stages of manufacturing as summarized in Applicant's *Production Methods Plan*, written in accordance with the handling requirements of 935 CMR 500.105(3) :

- Measures for energy efficiency and environmental impact;
- Initial receipt of Finished Marijuana;
- Extraction Program;
- Infusions Program;
- Cleaning of contact surfaces; and
- Sterilization of utensils and equipment.

In addition, the following specific Quality Control procedures may be found in separate sections, as noted:

- Packaging and Labeling, 935 CMR 500.105(4)-(7) and 935 CMR 500.150(3) – *Branding and Packaging Plan;*
- Facility construction for cleanliness, maintenance and safety, 935 CMR 500.105(3) – *Storage Plan*;
- Sanitary Storage and Handling, 935 CMR 500.105(3)(b)(1)-(4),(6)-(14) – *Storage Plan*;
- Waste removal, 935 CMR 500.105(3)(b)(5) – *Inventory Plan*;
- Employee training for 'Consumer, Product, and Public Safety', consistent with 935 CMR 500.105(2), – *Qualifications and Training Plan*;
- Assuring quality through storage in transportation, 935 CMR 500.105 (3)(b)(15)-(16) – *Transportation Plan*; and
- Recall Plan, 935 CMR 500.130(5)(b)-(c) - *Inventory Plan*.

Handling

In accordance with 935 CMR 500.130(5)(g) all Edible Marijuana Products will be prepared, handled, and stored in compliance with the sanitation requirements in *105 CMR 590.000: State Sanitary Code Chapter X: Minimum Sanitation Standards for Food Establishments*, and with the requirements for food handlers specified in *105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*.

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Applicant values the safety of the community and will sell all Marijuana Products in a safe and sanitary manner in accordance with all regulatory mandates, including but not limited to the handling of Marijuana and Marijuana Products protocols set forth in 935 CMR 500.105(3). As required by 935 CMR 500.105(3)(b)(1), all agents and personnel within Applicant's facility whose job includes contact with Marijuana, as noted above, will be required to abide by the food handlers requirement in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*. In accordance with 935 CMR 500.105(3)(b)(2), all such personnel shall maintain adequate and personal cleanliness, including washing hands in an adequate hand washing area before starting work, handling any product, after handling any non-sanitary items, before returning to work from a break, or at any other time when hands may have become soiled or contaminated. As set forth in 935 CMR 500.105(3)(b)(3), Applicant will furnish adequate hand washing stations for personnel, furnished with running water at a suitable temperature, in convenient areas, including in the employee break room, with effective hand cleaning preparations and sanitary towel services and/or suitable drying device. Employees will further be provided with adequate, readily available and accessible toilet facilities that are maintained in a sanitary condition and in good repair, in compliance with 935 CMR 500.105(3)(b)(13). (Areas highlighted on *Quality Control Plan Exhibits A-B*). In accordance with 935 CMR 500.105(3)(b)(5), waste and litter will be removed and disposed of daily in an adequate manner pursuant to 935 CMR 500.105(12) to minimize the development of odor and the attracting and harboring of pests. Sanitation policies, including food handlers' requirements, will be reviewed during employee training and periodically as needed.

Applicant believes that the compliant and safe handling of Marijuana begins with ensuring sanitary conditions at the facility. Thus, it is important that during all stages of manufacturing, strict protocol is followed . In accordance with 500.105(3)(b)(8), the building, fixtures, and other physical facilities will be maintained in a sanitary condition. Further, as required by 935 CMR 500.105(3)(a)(1)-(3), Applicant will implement standard operating procedures that allow for the processing of only the leaves and flowers of the female Marijuana plant only, which shall be: (1) well cured and generally free of seeds and stems; (2) completely free of dirt, sand, debris, and other foreign matter; and (3) free of contamination by mold, rot, other fungus, and bacterial diseases; Applicant will immediately dispose of any Marijuana, Marijuana Products, and other ingredients, that contains mold, rot, and other fungus or bacterial diseases in strict accordance with the waste disposal requirements set forth in 935 CMR 500.105(12). Any products that can support the rapid growth of undesirable microorganisms will be held in a manner that prevents the growth of such organisms, in accordance with 935 CMR 500.105(3)(b)(14).

As required by 935 CMR 500.105(3)(a)(4)-(5), Applicant will prepare and handle all Marijuana, Marijuana Products, and other ingredients, on food-grade stainless steel tables and will package products in a secure area. As required by 935 CMR 500.105(3)(b)(9), all contact surfaces, including utensils and equipment, will be maintained in a clean and sanitary condition and

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sanitized at least daily, after any contact with non-sanitary surfaces or items, and otherwise as may be necessary to protect against contamination. To this end, Applicant will choose surfaces and utensils that are smooth and easy to clean, such as stainless-steel tables and bowls for trimming, and will use a sanitizing agent registered by the US Environmental Protection Agency (EPA), while strictly adhering to labeled instructions. There will be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations, as required by 935 CMR 105(3)(b)(4). In this connection, all toxic items will be identified, held, and stored in a manner that protects against contamination of Marijuana Products, as required by 935 CMR 500.105(3)(b)(10).

The floors, walls, and ceilings of Applicant's facility will be constructed in such a manner that they may easily be kept clean and in good repair, as required by 935 CMR 500.105(3)(b)(6) – floors will be coated with a VOC-free sealant, and walls will be constructed with Permatherm insulated wall panels, or similar. As required by 935 CMR 500.105(3)(b)(7), there will be adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned, thus ensuring organization and to protect against accidents which could disrupt the flow of Applicant's various activities.

Storage of Finished Marijuana Products awaiting testing results from an Independent Testing Laboratory and products that comply with testing requirements, will be stored in a segregated area of the Vault, marked "Awaiting Testing, Do Not Dispense". All tested products will be stored and transported under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers, as required by 935 CMR 500.105(3)(b)(15).

Applicant will take care to ensure that products are not contaminated through its water supply and that, in strict accordance with 935 CMR 500.105(3)(b)(11), its water supply will be sufficient for necessary operations – safe, potable, and in adequate quantity. To this end, as required 935 CMR 500.105(3)(b)(12), plumbing shall be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout Applicant's facility; such plumbing will properly convey sewage and liquid disposable waste from Applicant's facility. And in further accordance with 500.105(3)(b)(12), there will be no cross-connections between the potable and wastewater lines.

Applicant will handle all Marijuana and Marijuana Products under continuous video surveillance, as set forth in detail in its *Security Plan*, *Diversion Prevention Plan*, and *Inventory Plan*. Specifically, when videotaping the weighing, inventorying, and accounting of Marijuana and Marijuana Products before transportation, the video will show each product being weighed, counted, and the appropriate manifest, as required by 935 CMR 500.105(13)(a)(9). Procedures for transporting Marijuana Products are described in Applicant's *Transportation Plan* which details vehicles, agents, transportation equipment, and transportation records. Further

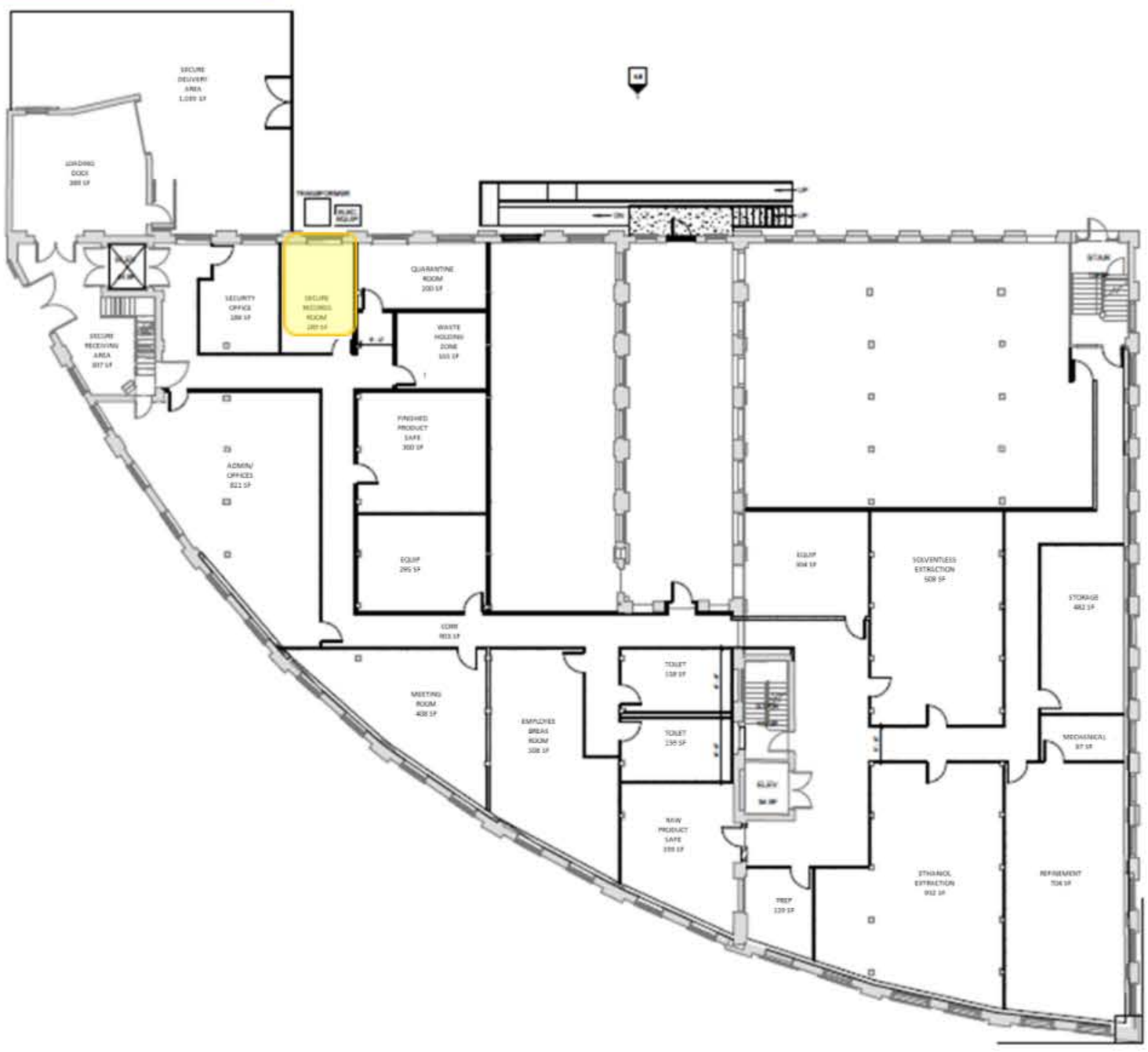
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Facility Overview

Site plan of the Ground Floor level provided below, identifies key areas referenced in this *Recordkeeping Plan*. The complete building site plan can be found in Applicant's *Proposed Timeline*.

Recordkeeping Plan Exhibit A: 2nd floor

- Secure Records Room



Record Creation & Storage

Applicant's records will be kept in paper and computerized formats (as authorized by 935 CMR 500.105(9)(e)) in accordance with the Company's Standard Operating Procedures (SOPs), as summarized below. Applicant will employ METRC as the Company's inventory tracking system (ITS) along with a Commission-compliant inventory point-of-sale software, Trellis or similar. Applicant's inventory software will be fully integrated with METRC to ensure transparency and efficiency in all records handling, together with compliance with 935 CMR 500.105(8) and (9) as stated below under the Inventory & Sales Records section.

Physical Records

All physical records will be securely stored in a locked, fireproof filing cabinet in the restricted Secure Records Room, located on the Ground Floor (highlighted on *Recordkeeping Plan Exhibit*

A). Vendor-specific documents will be stored and categorized by vendor and date of record creation. Production batch records, sales receipts, shipping manifests, inventory audit reports, quarantine records, waste and destruction records, and other internal documents and files will be stored chronologically and by document type.

Physical records may be scanned and stored as duplicate electronic files. The employee responsible for scanning the document will also log the information indicating that the document has been duplicated and stored electronically. All hard copy records will be kept for no less than two (2) years, unless mandated otherwise by the Commission or State government, or stated herein.

Computerized Records

As part of its recordkeeping protocol, Applicant will utilize the ITS, POS system, and accounting software, as well as an encrypted storage drive to upload and maintain digital records on the Company computer system. All digital records will be stored and maintained in such a way as to protect confidentiality, access to the Commission for audits, protections against unauthorized changes to data, and an audit trail to monitor all modifications to records. Caution will be taken to ensure that records and confidential information are protected and available only to authorized employees in order to prevent any improper disclosure, alterations, or deletions.

To safeguard computerized records, Applicant will institute Internet Protocol (IP) Security. All company computers will be protected with antivirus/malware software and daily IP scans will be conducted. Computerized records will be encrypted, and only accessible by the RT. All employees involved in the recordkeeping process will receive training for the Director of Compliance on proper recordkeeping procedures, including compliance and confidentiality. All digital records will be kept for no less than one (1) year, unless mandated otherwise by the Commission or State government, or stated herein.

Record Requests

As required by 935 CMR 500.105(9), records, including all information that may be relevant to a Commission inspection or an investigation of any incident or complaint, will promptly be made available to the Commission and when applicable, law enforcement, upon request. In accordance with 935 CMR 500.301(3), the RT will coordinate to locate and release the information to the Commission as soon as possible but no later than the end of the business day, unless the Commission grants more time to complete the request. Applicant is further mindful that, under 935 CMR 500.301(1), the Commission or its agents may inspect its facility and vehicles without prior notice in order to ensure compliance with applicable regulations, which includes access to records.

Other parties who request or require records will receive a timely response from RT within one business day or in accordance with other mandates.

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regulations. In addition to the above SOPs, Applicant will also maintain written policies and procedures related to the following activities at the facility:

- Visitor log and age verification of visitors, prepared in accordance with 935 CMR 500.110(4)(e);
- Inventory records prepared in compliance with 935 CMR 500.105(8)(d), including, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory;
- Methods for identifying, recording, and reporting diversion in compliance with 935 CMR 500.105(8), as required by 935 CMR 500.130(5)(a)
- All documentation of recalls, whether voluntary or mandatory, of products, as well as all actions or mitigation plans to remove the product from the market, and safely and properly dispose of the product, as required by 935 CMR 500.130(5)(b) -- Such procedures shall be adequate to deal with recalls due to any action initiated at the request or order of the Commission, and any voluntary action by Applicant to remove defective or potentially defective Marijuana from the market, as well as any action undertaken to promote public health and safety;
- Policies and procedures to assure proper segregation and destruction of quarantine and destruction of outdated, damaged, deteriorated, mislabeled, or contaminated product prepared in compliance with 935 CMR 500.105(12), as required by 935 CMR 500.130(5)(c);
- Preparation, handling, and storage of Edible Marijuana Products, in compliance with the sanitation requirements in 105 CMR 590.000: State Sanitary Code Chapter X: Minimum Sanitation Standards for Food Establishments, and with the requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements, as required by 935 CMR 500.130(5)(g);
- Maintaining a product catalogue identifying all types of Marijuana Products to be manufactured at the facility, which will include a description of each product with a photograph or illustration, packaging design, dosage, and expected cannabinoid profiles, as required by 935 CMR 500.130(5)(h);
- Price list of Marijuana Products to be sold, as required by 935 CMR 500.105(1)(f);
- Records relating to transportation prepared in compliance with 935 CMR 500.105(13), as required by 935 CMR 500.130(5)(d); and
- All records relating to sales and transfers of Marijuana between Applicant and other Marijuana Establishments, as required by 935 CMR 500.130(5)(f).

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- Upon the failure of any security alarm system due to a loss of electrical power or mechanical malfunction that is expected to last more than eight (8) hours; or
- After any other breach of security.

After the initial notification to the appropriate authorities and the Commission as required by 935 CMR 500.110(9)(a), Applicant will, within ten (10) days, create an incident report, as required by 935 CMR 500.110(9)(b), in a form and manner determined by the Commission which details the circumstances of the event, any corrective actions taken, and confirmation that the appropriate law enforcement authorities were notified. Applicant will retain these reports for at least one (1) year or for the duration of an open investigation, whichever is longer, as required by 935 CMR 500.110(9)(c).

Transportation Records

Transportation records will be documented within METRC and will be retained by Applicant in hard-copy and/or electronic file. These transportation records will include the transport and shipping manifests mandated by 935 CMR 500.105(13)(f), the original of which will always remain at the facility in the Secure Records Room (highlighted on *Recordkeeping Plan Exhibit A*). All transportation manifests will remain of record at the facility for at least one (1) year and will be made available to the Commission upon request.

Applicant will also keep on record any Emergency Stop Log that was created during an emergency stop of the transportation vehicle and any records created during a report of unusual discrepancy in weight or any accidents, diversions, losses, or other reportable incidents within 24 hours of the emergency stop or discovery of the discrepancy as required by 935 CMR 500.105(13)(b). Lastly, Applicant will maintain all vehicle records, such as maintenance, repairs, registration, and insurance. For more detail, see Applicant's *Transportation Plan.*

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Business Records

In accordance with 935 CMR 500.105(9)(e), Applicant will maintain and make available to the Commission upon request, business records. Such business records will include but are not limited to all approved versions of SOP's with uncompleted form templates, facility and equipment-related documentations, and financial records, which shall include manual or computerized records of: (i) assets and liabilities; (ii) monetary transactions; (iii) books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers; (iv) sales records including the quantity, form, and cost of Marijuana Products; and (v) salary and wages paid to each employee, stipend paid to each board member, and any executive compensation, bonus, benefit, or item paid to any individual affiliated with Applicant.

Facility and Equipment Records

Applicant will create and maintain records related to the facility and equipment. These will include but are not limited to: blueprints, occupancy permits, maps, equipment handbooks, and surveillance system information. As described in Applicant's *Insurance Plan,* Applicant will also keep reports documenting compliance with the continuous liability insurance coverage requirements as stated in 935 CMR 500.105(10), along with any other business insurance records. Applicant will keep all vehicle insurance records in compliance with 935 CMR 500.105(13)(c)(1)(b), as noted in Applicant's *Transportation Plan*.

Applicant will have detailed equipment and supply operations plans, including a lighting power densities (LPD) plan and the implementation of heating, ventilation, air conditioning and dehumudification systems according to all Massachusetts codes including 780 CMR: *State Building Code*, IECC Section C.403, or ASHRAE Chapter 6 as applied or incorporated by reference in 780 CMR: *State Building Code*.

Financial Records

Detailed information regarding Applicant's financial recordkeeping procedures are set forth in Applicant's *Financial Recordkeeping Plan*. As shown therein, Applicant will keep financial records in accordance with generally accepted accounting principles. These financial records will include ongoing documentation of assets and liabilities; all monetary transactions; books of accounts such as journals, ledgers, supporting documents, agreements, checks, invoices, and vouchers; and salaries and wages paid to all employees, stipends paid to each board member and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with Applicant.

Applicant's Bookkeeper will use an accounting software (Quickbooks or similar) to record all financial transactions, and Applicant will retain a third-party accountant experienced with the special accounting needs of a Marijuana Establishment to audit the company's books on a regular basis in order to prevent accounting errors and to ensure both generally accepted accounting

principles and accounting best practices are in use. The reviews generated by the accountant will be kept on file for easy access to the Commission whenever requested. The same accountant, assisted by a tax attorney experienced in providing legal services to cannabis businesses, will file business reports and taxes to the City, Commonwealth, and Federal Government, as necessary.

Each employee of the company will also be extensively trained and retrained in all accounting and expense reimbursement procedures in order to minimize all accounting errors to the greatest extent possible and to protect the integrity of such records.

Human Resources Records

Personnel policies and procedures are described in Applicant's *Personnel Plan.* As shown therein, Personnel policies and procedures will be outlined for all employees in the Employee Handbook and in SOPs. As required by 935 CMR 500.105(1)(i), Applicant will keep copies of Staffing Plans and staffing records prepared in compliance with 935 CMR 500.105(9)(d).

Personnel Records

As required by 935 CMR 500.105(9)(d)(1), Applicant will create and maintain personnel records that include job descriptions for each employee or volunteer position and organizational charts consistent with the job descriptions. Applicant will maintain a log of the initial date of approval and expiration dates as well as supporting documents for agent registrations and other licenses required for employment to ensure that these documents do not expire.

Personnel records for each employee will be maintained for the life of the employee's employment and at least one (1) year after termination or resignation, as required by 935 CMR 500.105(9)(d)(2). Individual personnel files will be located within a locked, fireproof filing cabinet in the Secure Records Room, will be monitored by the HR Administrator, and will contain (at a minimum) the following information:

- Reference verification documents;
- Job description or employment contract, including duties, authority, responsibilities, qualifications, and supervision;
- Individual training logs & records (such as privacy and confidentiality training and responsible vendor and eight-hour related duty training), these records will include a verification form signed by the employee containing training specifics, such as date, time, place, topics, and presenters;
- Periodic performance evaluations;
- Disciplinary action taken (if any);
- Registered agent documentation submitted to the Commission pursuant to 935 CMR 500.030, including background check reports, CORI documentation, correspondence with the Commission regarding

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suitability, approvals with supporting documents, annual renewals, and any termination or resignation notices to the Commission; and

- Photocopy of registered agent card, driver's license, and/or professional license.

Operational Records

As required by 935 CMR 500.105(9)(a) and described herein, operational procedures will be created and maintained in compliance with 935 CMR 500.105(1) to document daily activities in accordance with State regulations, Applicant's SOPs, and METRC requirements for documentation. These records will include inventory and sales records, recall and waste disposal records, incident reports, and transportation records, as outlined below.

In addition, operational records will also include security-related documentation, which will include equipment checks, access controls, visit logs, surveillance logs, as outlined in Applicant's *Security Plan.* Applicant will also keep Commission correspondence, such as permits, renewals, leadership rating information, audits, complaint investigation/reports, deficiency statements and plans of correction (if any), as party of the operational records.

Inventory & Quality Control Records

As required by 935 CMR 500.105(9)(b), Inventory records will be created and maintained as Operational Records in compliance with 935 CMR 500.105(8). This will include results obtained through lab sampling and testing, tracking the flow of the product up through and including the transport to a transporter or a retail or manufacturing facility. Applicant's SOPs will provide for the documentation of inventory control in accordance with METRC requirements as required by 935 CMR 500.105(8)(e), thus meeting the seed-to-sale tracking requirements for record retention in accordance with 935 CMR 500.105(9)(c). Some examples of recordkeeping logs that Applicant will maintain, are as follows, with samples exhibited beneath:

- Daily Product Manufacturing Log;
- Environment Documentation Log;
- Product Recall Log;
- Equipment Maintenance Log;
- Manufacture Waste Log;
- Disposal Log; and
- Master Inventory Log.

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Sample Logs

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MASTER INVENTORY LOG

Product Form	Batch Number	Unique ID	Reported Quantity	Reported Weight	Record Date	Recording Agent	Electronic Signature	Re-Inv Date	New Quantity	New Weight	Record Date	Recording Agent	Electronic Signature	Δ	Reported / Verified	Destination	Transfer Date	–
<Form ID>	<Batch ID>	<UID #>	<#>	<Grm>	<Date>	<Name, Title, Badge ID>	<Enter Code>	<Date>	<#>	<Grm>	<Date>	<Name, Title, Badge ID>	<Enter Code>	[illegible]	< R/V>	<Area>	<Date>	..

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MANUFACTURING WASTE LOG

Record Date and Time	Room Name, Number	Source Batch	Reason for Disposal	Recording Agent 1	Electronic Signature	Recording Agent 2	Electronic Signature
<Date and Time>	<Room Name, Number>	<Unique ID>	<Reason Code>	<Name, Title, Badge ID>	<Enter Code>	<Name, Title, Badge ID>	<Enter Code>

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DISPOSAL LOG

Date and Time of Disposal <Date and Time>	Manner of Disposal <Disposal Code>	Solid Waste Mix Weight <Grms>	Waste UID # <Unique ID>	Origin UID <Unique ID>	Batch ID <Batch ID>	Strain <Strain>	Quantity <#>	Original Weight <Grms>	Reason for Disposal <Disposal Code>	Recording Agent 1 <Name, Title, Badge ID>	Electronic Signature <Enter Code>	Recording Agent 2 <Name, Title, Badge ID>	Electronic Signature <Enter Code>
				ONLY COMPLETE THIS SECTION IF PLANT MATERIAL DISPOSED OF WAS PREPARED FOR SALE TO A LICENSED DISPENSARY OR PROCESSOR								

Applicant will require that best practice testing and quality control protocols are implemented and understood by all members of the facility. Meeting and exceeding the requirements of 935 CMR 500.101(1)(c)(8)(f) and 935 CMR 500.105(1)(h), to ensure that all product produced by Applicant meets the highest quality standards and regulation, Applicant will ensure SOPs include the following:

- A mandatory review of the batch production records;
- Results of all tests and examinations of components used through in-process materials, the finished product, and all packaging and labeling;
- Written approval or rejection of the batch and reasons for rejection; and
- Documentation of any required material review, inventory reconciliation and disposition, and any other documentation required by the Commission.

Product Transfer or Sale Records

As required by 935 CMR 500.130(4), for the sale or transfer of cannabis products, Applicant will document testing compliance in accordance with 935 CMR 500.160 and the guidance provided by *Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products*, including the environmental media testing of soils, solid growing media, and water; as well as testing for contaminated products in accordance with 935 CMR 500.105(1)(h).

The RT must record all lab results which will be maintained for no less than one (1) year. Applicant will implement a written policy for responding to any results indicating higher than acceptable contaminant levels. For any tested product that is contaminated, Applicant will

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BURN BRIGHT LLC
MASSACHUSETTS ADULT-USE MARIJUANA PRODUCT MANUFACTURER:
Recordkeeping Procedures

Summary Overview

In accordance with 935 CMR 500.101(1)(c)(8)(i) and 500.105(1)(g), Applicant submits the following detailed summary of operating policies and procedures including standard operating procedures for recordkeeping *("Recordkeeping Plan")*. Applicant will implement recordkeeping procedures designed to protect important and confidential records while ensuring that Applicant is in full compliance with 935 CMR 500.000, generally accepted accounting principles, and all other applicable laws, regulations, and local rules.

Applicant's *Recordkeeping Plan* is designed so that all employees know their role in recording and maintaining records. All employees will be required to sign a Records Retention Plan Acknowledgement Form, indicating that they have reviewed and understand recordkeeping procedures. This plan will summarize how Applicant will create, store, and dispose of records. It will then give an overview by section of business, human resources, and operational records.

Key Staff

The *Recordkeeping Plan* will be implemented by a Recordkeeping Team (RT), consisting of several key employees including the Director of Inventory, Director of Compliance, Director of Operations, Director of Security, and HR Administrator, with oversight and coordination from the Chief Executive Officer. A complete organizational chart can be found in Applicant's *Business Plan*. The purpose of the RT is as follows:

- Ensuring that records are organized, to facilitate proper and timely retrieval of records, and to document program compliance;
- Managing compliant physical and computerized records, conducting record reviews and audits, updating the recordkeeping SOPs;
- Maintaining a robust, transparent set of records for Applicant's facility;
- Managing training and education for employees, and ensuring that all registered agents comply with defined policies, procedures, and regulations; and
- Fulfilling record requests by the Commission and law enforcement.

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SOPs will require that every record request is documented and retained in the Secure Records Room along with a copy of any records that were released. If electronic recordings, physical or digital copies of documents, or products are released to the Commission or law enforcement, the items will be prepared to remain compliant with chain of custody SOPs.

Record Destruction

Records will not be intentionally damaged, altered, disposed of, or removed except with authorization from the RT in accordance with record retention and destruction SOPs or as otherwise directed by the Commission. This includes both hard-copy, physical records and electronic, digital records. In the event it is discovered that there is any manipulation or alteration of records, Applicant will immediately disclose the situation to the Commission and will comply with any investigation and resulting action plans, up to and including termination of the individual responsible and notification to law enforcement. Applicant will keep all incident report documentation as stated below in "Operational Records."

The Director of Compliance is responsible for identifying which, if any, records must be destroyed and for overseeing their destruction. Duplicate physical documents printed for use in operations, documents with incorrect information, and other unnecessary documents are all examples of documents that can and should be destroyed in order to limit the amount of paper records in storage to pertinent documentation. Destruction of all physical records and other business documents will be accomplished by cross-shredding.

In the event the licensed business should close operations, Applicant will maintain records at Applicant's expense for at least two (2) years in a form and location acceptable to the Commission at the expense of Applicant, per 935 CMR 500.105(9)(g). Applicant will identify and provide telephone, address, and electronic contact information for a primary and secondary person to facilitate future record reviews in accordance with the approved closing plan.

Standard Operating Procedures (SOPs)

Written detailed SOPs will be developed for Applicant's manufacturing facility in accordance with 935 CMR 500.105(1)(a)-(r) and 935 CMR 500.130(5) and will include, at a minimum:

- Security measures that comply with 935 CMR 500.110;
- Employee security policies, including personal safety and crime prevention techniques;
- Hours of operation and after-hours contact information (which shall be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.);
- Storage and waste disposal of Marijuana and Marijuana Products in compliance with 935 CMR 500.105(11);

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- Accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);
- Prevention of diversion of cannabis to individuals younger than 21 years old, as required by 935 CMR 500.105(1)(p);
- Quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
- A staffing plan, with staffing records procedures written in compliance with 935 CMR 500.105(9);
- Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
- Alcohol, smoke, and drug-free workplace policies;
- Maintenance of confidential information;
- A policy for the immediate dismissal of any agent who has:
    - Diverted cannabis, which shall be reported to law enforcement officials and to the Commission;
    - Engaged in unsafe practices with regard to the operation of the Marijuana Establishment, which shall be reported to the Commission; or
    - Been convicted or entered a guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority;
- Cash Handling (storage, collection frequency, and transport to financial institution(s));
- A list of all board members and executives (which will also be satisfied by placing the information on Applicant's website, per 935 CMR 500.105(1)(n));
- Plans to reduce energy and water usage, engage in energy conservation, and mitigate other environmental impacts in compliance with 935 CMR 500.105(15), as required by 935 CMR 500.130(5)(e), which are further detailed in Applicant's *Production Methods Plan*;
- Protection plans for workers and consumers (*e.g.,* eyewear near operating grow lights) as required by 935 CMR 500.105(1)(r);
- Protocol relating to testing for contaminants and pesticides as provided under 935 CMR 500.160, M.G.L.c. 132B, and 333 CMR 2.00-14.00; and
- Packaging and labeling products per 935 CMR 500.105(5)-(7).

Applicant's department Directors will work with the Director of Compliance to ensure that all SOPs are written according to both industry best practices and Massachusetts and local

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require a record notice be provided to the Commission, including its assessment of the contaminant's source and plan for the destruction of the product.

Recall and Waste Disposal Records

As required by 935 CMR 500.105(9)(f), Applicant will keep written procedures and policies for the recall and waste disposal of Marijuana and Marijuana Products prepared in compliance with 935 CMR 500.105(12). When it is determined that a product is rendered defective or potentially defective, Applicant will require its removal from the market and any facilities where it has been transferred. This mitigation process will begin by requiring employees to immediately notify the Director of Operations and Director of Inventory of the contaminated product and to record the batch number, type of contamination, date, time, any facilities the product had been transferred to, notes of communications with the facilities, and any other information required by the Commission. The product will immediately be segregated from the uncontaminated product and will be subsequently disposed of according to regulatory requirements.

All waste disposal will also be recorded and kept for at least three (3) years, or longer if the Commission orders its extension due to an enforcement action under 935 CMR 500.105(12)(d). Waste handling will also be recorded in extensive detail to include the date and time of disposal, product being disposed of, agents disposing, and a summary of how the product was disposed of. In compliance with regulation, Applicant requires two agents to be present during the disposal and each agent will sign off on the Manufacturing Waste Log. Electronic records of the waste and disposal records will be located in METRC and through surveillance tapes. Further detail on Applicant's waste disposal procedures can be found in Applicant's *Inventory Plan*.

Incident Report Records

As required by 935 CMR 500.110(9)(c), Applicant will maintain all documentation related to all incidents that are reportable under 935 CMR 500.110(9) and its security plans detailed within its *Security Plan* and *Diversion Prevention Plan.* To this end, Applicant will create and maintain incident reports in the following circumstances:

- Upon the discovery of discrepancies identified during inventory;
- After the diversion, theft or loss of any cannabis product;
- When any criminal action occurs on or in the Marijuana Establishment premises;
- After any suspicious act involving the sale, manufacture, distribution, processing or production of cannabis by any person;
- Upon the unauthorized destruction of cannabis;
- When any loss or unauthorized alteration of records related to cannabis occurs;
- After an alarm activation or other event that requires response by public safety personnel or security personnel privately engaged by Applicant;

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Product Safety Commission as included at 16 CFR 1700, as required by 935 CMR 500.105(6)(a)(1)(d). As applicable, Applicant's Marijuana Products will be labeled in full compliance with the requirements of 935 CMR 500.105(5), including, among other things the capitalized statement, "KEEP THIS PRODUCT AWAY FROM CHILDREN," and a symbol indicating that the product is harmful to children, providing "NOT SAFE FOR KIDS," similar to sample below.



Packaging will not include any of design elements determined by the Commission to appeal to minors, as required by 935 CMR 500.105(6)(b), which expressly prohibits, among other design elements, the following:

- Use of bright colors, defined as "neon" in appearance;
- Imitating or resembling any existing branded consumer products, such as food or beverages that do not contain Marijuana;
- Featuring cartoons;
- Featuring a design, brand or name that resembles a non-cannabis consumer product of the type that is typically marketed to minors;
- Featuring symbols or celebrities commonly used to market products to minors;
- Featuring images of minors; or
- Featuring words that refer to products that are commonly associated with minors or marketed to minors.

All other marketing, advertising and branding produced by or on behalf of Applicant will also be designed with the prevention of diversion to minors in mind, in strict accordance with 935 CMR 500.105(4). Specifically, among other things, Applicant will only engage in reasonable marketing, advertising and branding practices that are not otherwise prohibited in 935 CMR 105(4)(b) and that do not promote the diversion of Marijuana or Marijuana use in individuals younger than 21 years old; in this connection, Applicant's marketing, advertising, and branding created for viewing by the public shall include various warnings, which may include: "For use only by adults 21 years of age or older. Keep out of reach of children," and a capitalized statement providing, among other things, "KEEP THIS PRODUCT AWAY FROM CHILDREN," as required by 935 CMR 500.105(4)(a)(5) and (6), respectively. Applicant's website, when established, will include an age verification gate to ensure that only individuals age 21 or older may enter the website, as required by 935 CMR 500.105(4)(b)(13). And

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BURN BRIGHT LLC
MASSACHUSETTS ADULT-USE MARIJUANA MANUFACTURING:
Restricting Access to Age 21 and Older

Summary Overview

In accordance with 935 CMR 500.105(1)(p), 935 CMR 500.105(14), and 935 CMR 500.140(2), Applicant submits the following summary of policies and procedures for restricting access to its Marijuana Manufacturing Establishment (*"Restricting Access Plan"*), as well as its Marijuana and Marijuana Products, to persons age 21 and older.

Key Staff

Key staff members who are responsible to implement the *Restricting Access Plan* are as follows. A complete organizational chart may be found in Applicant's *Business Plan*.

Director of Security:

- Monitoring video surveillance; and
- Overseeing customer entry.

Directory of Compliance:

- Ensuring that procedures for positive identification are appropriately defined in new agent onboarding training, as well as in continuing education modules;
- Ensuring that all packaging and marketing materials are produced in strict accordance with regulations;

Positive Identification

Safety, and restricting access to minors, are principal considerations in Applicant's operating policies and procedures. Positive Identification will be the primary means of restricting access to the premises of Applicant's Marijuana Manufacturing Establishment. Accordingly, Applicant has developed comprehensive Training for Checking IDs, which is set forth in Applicant's *Qualifications and Training Plan.*

Customers

A licensed Marijuana Establishment Agent will greet and welcome each individual before entry into the premises of Applicant's Marijuana Manufacturing Establishment, and before permitting entry, will immediately inspect the individual's proof of identification and determine the individual's age. In accordance with 935 CMR 500.140(2)(a), the individual shall not be admitted into the premises, unless the Agent has verified that the individual is 21 years of age or older by inspection of the individual's proof of identification.

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Applicant will only sponsor charitable, sporting, or other similar events if Applicant has a reasonable expectation that at least 85% of the audience will be 21 years of age or older, as required by 935 CMR 500.105(4)(a)(2).

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Once the individual has been verified to be 21 years of age or older, they will pass through to Secure Entrance Vestibule in order to reach the Manufacturing Area.

(A) A Marijuana establishment may not acquire or record Consumer personal information other than information typically required in a Manufacturing transaction, which can include identifying information to determine the Consumer's age. A Marijuana Manufacturinger may not record or retain any additional personal information from Consumer without the Consumer's voluntary written permission.

(B) A Marijuana establishment that has entered into Delivery Agreements with Delivery-only Licensees for the purpose of transacting home deliveries to Consumers shall establish a Pre-verification process for Consumers who intend to place orders for delivery with the Marijuana Establishment. To comply with the requirements of pre-verification, the Marijuana Establishment shall:

1. Require the Consumer to pre-verify with the Marijuana Establishment either in person or through a Commission-approved electronic means by presenting or submitting the Consumer's valid, unexpired government-issued photo identification; and
2. Examine the identification and verify that the individual Consumer presenting or submitting the identification is the individual Consumer that matches the identification and that the individual Consumer is 21 years of age or older.

(e) Collect and maintain relevant information about the individual Consumer, for the purpose of transacting a delivery and ensuring that the recipient of a delivery under 935 CMR 500.145 is legally allowed to receive Marijuana and Marijuana Products:

1. The individual's name;
2. The individual's date of birth;
3. The individual's address;
4. The individual's primary telephone number; and
5. The individual's email address.

(f) Any such information collected by the Marijuana Establishment shall be used solely for the purpose of transacting a delivery of Marijuana or Marijuana Products under 935 CMR 500.145 and shall be otherwise maintained confidentially.

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Other Visitors

Applicant will limit access to the premises of its Marijuana Manufacturing Establishment to Consumers to individuals on the premises of its establishment for a purpose related to its operations, consistent with the direction of 935 CMR 500.105, provided however, that no such individual will be younger than 21 years old.

All outside vendors, contractors, and visitors will obtain a visitor identification badge prior to entering the premises, and after having their identification and age checked by any staff member at management level or above. The visitor identification badge will be visibly displayed at all times while the visitor is in the facility, and they will be escorted at all times by a designated and authorized staff member. All visitors will be logged in and out at the Security Delivery Area and through the Limited Access Area Corridor (as shown on *Restricting Access Plan Exhibit A*), and the log shall be made available to the Commission for inspection at all times. All visitor identification badges will be returned to the designated staff member upon exit.

All registered agents will be subject to suitability standards and background checks to ensure they are 21 years of age or older. Further details on staff/candidate review and onboarding can be found in Applicant's *Qualifications and Training Plan*.

Applicant's comprehensive security measures are written in accordance with 935 CMR 500.110**,** and can be found in Applicant's *Security Plan.*

Access

In accordance 935 CMR 500.105(14), Applicant shall grant access into the facility, and review of staffing and visitor logs, to the following individuals:

- Representatives of the Cannabis Control Commission in the course of responsibilities authorized by St. 2016, c. 334, as amended by St. 2017, c. 55 M.G.L. c. 94G and 935 CMR 500.000;
- Representatives of other state agencies of the Commonwealth;
- Emergency responders in the course of responding to an emergency; and
- Other authorized law enforcement personnel or local public health inspectional services, or other permit-granting agents acting within their lawful jurisdictions.

Marketing and Packaging

As described more comprehensively in Applicant's *Branding and Packaging Plan*, to further protect against diversion to minors, all products manufactured by Applicant for sale to wholesalers and consumers will be packaged in tamper or child-resistant packaging certified by a qualified third-party tamper or child resistant packaging testing firm that the packaging is in compliance with most recent poison prevention packaging regulations of the US Consumer

- All raw materials including Finished Marijuana, and Edible Marijuana Products, shall be prepared, handled, and stored in compliance with the sanitation requirements of 105: CMR 500.000: *Good Manufacturing Practices for Food*, 105 CMR 590.000: *State Sanitary Code Chapter X: Minimum Sanitation Standards for Food Establishments*, and with the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*; and
- Any Marijuana Product that is made to resemble a typical food or beverage product must be packaged and labeled in compliance with 935 CMR 500.105(5)-(6). Further detail on Applicant's compliant packaging and labeling policies can be found in Applicant's *Branding and Packaging Plan.*

Policies and procedures for Applicant's safe and sanitary preparation, handling, and storage of Marijuana and Marijuana Products, which are written in compliance with 935 CMR 500.105(3) and (11), 935 CMR 500.130(2) and 935 CMR 500.150(1) and (2), are set forth in Applicant's *Quality Control Plan*.

Transportation Safety

Applicant has also developed robust policies to ensure safety of its employee, and of its products, in transit, described more comprehensively in its *Transportation Plan*, and summarized below. These conditions will be met whether Applicant purchases their own transport vehicle, to which it is entitled under 935 CMR 500.002 and 935 CMR 500.105(13)(a)(1), or hires an independent Marijuana Transporter to make its deliveries.

An important part of transportation safety is ensuring that Marijuana Transport Vehicles are not easily identifiable. In accordance with the requirements of 935 CMR 500.105(13)(c)(3), transport vehicles will be plain and unmarked, with no indication that the vehicle contains or is transporting Marijuana or Marijuana Products, nor any indication of Applicant's name (or the name of any Marijuana Transporter, as applicable). Further, and as required by 935 CMR 500.105(13)(c)(1)(c), transport vehicles will be equipped with a security alarm system pre-approved by the Commission. In accordance with 935 CMR 500.105(13)(c)(5), at no time will firearms be located within the transport vehicle or on a Transport Agent.

Proper coordination of transfers and delivery logistics are key components of ensuring safety of employees and of the manufacturing facility. Accordingly, Applicant has developed General Procedures for Transportation, designed with safety and security in mind.

- Scheduling of times and routes for the transport of Marijuana and Marijuana Products will be randomized, as required by 935 CMR 500.105(13)(a)(12); randomization will involve design of multiple different routes per destination (considering, of course, minimizing its

BURN BRIGHT LLC
MASSACHUSETTS ADULT-USE MARIJUANA PRODUCT MANUFACTURER:
Safety Plan

Summary Overview

In accordance with 935 CMR 500.101(3)(c)(3), Applicant submits the following plan for the safe manufacture, production, and distribution of Marijuana Products ("*Safety Plan*"). Safety training, and fostering a culture of compliance, are critical components of this plan. In compliance with 935 CMR 500.105, 935 CMR 500.130, and 935 CMR 500.150, Applicant has developed this plan to ensure consumer safety, as well a safe and healthy work environment.

Key Staff

Key staff members who will implement this *Safety Plan* and their specific roles follow beneath. A complete organizational chart can be found in Applicant's *Business Plan*.

Director of Compliance:

- Developing compliant safety and sanitation practices for manufacturing facility;
- Reviewing SOPs to ensure safety and sanitations are met;
- Working with Director of Operations, Extraction Lab Director and Culinary Director to communicate safety and sanitation policies and procedures to the Manufacturing Team;
- Monitoring transport routes and schedules as needed; and
- Ensuring that initial and ongoing safety and sanitation training requirements are being met.

Director of Operations:

- Coordinating safety and sanitation training, and reporting such data to Director of Compliance;
- Regularly communicating all safety and sanitation policies and procedures to the Manufacturing Team;
- Overseeing Manufacturing Team to ensure safety and sanitation protocols are being followed;
- With the support of Extraction Lab Director, Culinary Director, Director of Security and Transport Agents, monitoring and maintaining all safety-related equipment, structures, and vehicles; and
- Ordering safety and sanitation equipment as needed.

Extraction Lab Director and Culinary Director:

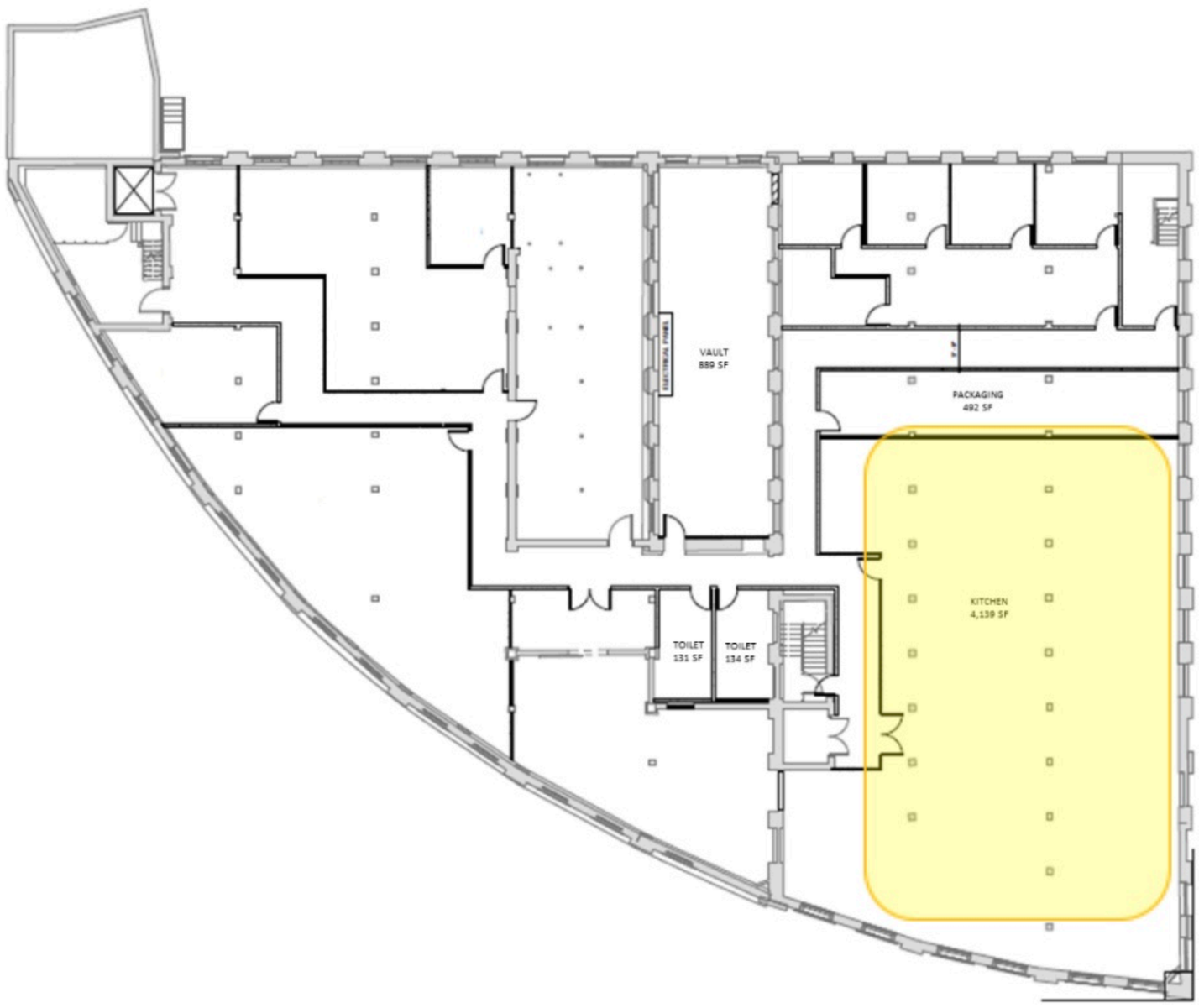
- Implementing safety and sanitation policies;
- Ensuring that safety and sanitation procedures are being followed within their departments; and
- Informing Director of Operations when new safety and sanitation equipment is needed.

Facility Overview

The following site plans depict all areas where manufacturing activities will occur, from acquisition of raw materials to transport. Key areas referenced in this *Safety Plan* are highlighted.

Safety Plan Exhibit A: Basement

- Kitchen



Safety Plan Exhibit B: 2nd Floor

- Extraction and Refinement Labs and Storage
- Employee Break Room
- Secure Delivery Area



Safety and Sanitation Protocols

Applicant takes safety very seriously and accordingly, has established the procedures and protocols to address the safety of workers within the manufacturing facility as well as that of consumers, summarized below. Applicant will ensure a safe environment by implementing a culture of safety, based on OSHA standards. All staff will undergo safety training at the beginning of their employment and at least once yearly. More comprehensive information on Applicant's training programs may be found in its *Qualifications and Training Plan.*

Fostering a Culture of Safety and Compliance

Applicant will prominently post the following sign in locations around the facility, including the Employee Break Room, located on the Ground Floor, highlighted on *Safety Plan Exhibit B*.



Protective Equipment

Each employee will be required to wear clean clothing appropriate for the duties he or she performs, to include, but not limited to, closed toe shoes and socks, long sleeve shirts and long pants when appropriate. They must always wear the appropriate protective apparel, such as head, face, hand and arm coverings, as necessary to protect Marijuana and Marijuana Products, other raw materials, tools, and equipment from contamination. They will be required to practice good hygiene, such as adequate hand washing. If affected by a communicable illness or disease, the employee will not be permitted to attend work.

Applicant will supply and ensure the use of personal protective equipment (PPE) for employees to perform duties. PPE serves to protect both the individual and the environment, as it ensures safety and helps maintain cleanliness and prevent contamination. It is the responsibility of the employee to care for their PPE and keep all PPE clean, labeled, and organized. This PPE will include but is not limited to nitrile gloves and lab coats; 3M particle protective respirator masks and goggles and/or eye protection (pictured below); and culinary tools. Applicant will ensure that nitrile gloves are inspected for rips or tears before each use. Nitrile gloves will be disposed of after every use and lab coats washed daily.

Employees in the manufacturing facility will wear respirators during any activity with high concentrations of ethanol. Applicant will also establish a written Respiratory Protection Program, according to OSHA standards. Applicant's Respiratory Protection Program will be updated as necessary to reflect any changes in workplace conditions that affect respirator use. Applicant's

Respiratory Protection Program will include several important details, but first and foremost, it will detail workplace specific tasks and hazards for which respirator use is required. Applicant's Extraction Lab Director will be the designated program administrator and will be trained to administer the program. Applicant will provide on-site training and fit-testing for respirators. All respirators will be certified by the National Institute for Occupational Safety and Health (NIOSH).



Emergency Procedures

In accordance with 935 CMR 500.105(1)(j), Applicant will develop a robust set of Emergency Procedures, which will be included in mandatory Safety Training, and will be made easily accessible in all areas of the facility. Emergency Procedures will cover the following.

- Awareness of property;
- Health and safety standards;
- Restricted areas;
- Emergency procedures in case of a fire;
- Emergency procedures in case of a chemical spill or chemical contact;
- Emergency procedures in case of inhalation or ingestions;
- Equipment cleaning and maintenance procedures;
- Equipment safety checks;
- Safe chemical and waste disposal procedures; and
- Accident prevention policies and best practices.

Safe Handling and Storage of Marijuana and Marijuana Products

All processes (including, but not limited to: Receiving, Extraction, Refinement, Concentrates Processing, Infusions – Edibles and Topicals, Packaging, Distribution) within the manufacturing lab will adhere to the requirements set forth in 935 CMR 500.130(2). To this end, any part of the entire manufacturing program that is part of Edible Marijuana Products production will take place in compliance with the following:

carbon footprint to the greatest extent possible), route scheduling with differing delivery days and times, and crew scheduling with differing shift and staff matches;

- All transport vehicles will be equipped with a trackable Global Positioning System (GPS) monitoring device, as required by 935 CMR 500.105(13)(e)(1), which, per 935 CMR 500.105(13)(e)(1)(a)-(d), will be attached to the transport vehicle at all times while Marijuana or Marijuana Products are inside the vehicle; during transfer, each Transport Agent will be able to contact the cultivation facility personnel at all times, through a secure form of communication, as required by 935 CMR 500.105(13)(e)(2); and the GPS device and all cellular phones will be tested by the Transport Agents for operability prior to leaving the cultivation facility and immediately after departure, as required by 935 CMR 500.105(13)(e)(5). If at any time the GPS device or both primary and secondary cellular phones fail while on route, the Transport Agents will immediately return to the cultivation facility until all devices are working, consistent with the requirements of 935 CMR 500.105(13)(e)(6);
- As required by 935 CMR 500.105(13)(a)(6), all transport of Marijuana or Marijuana Products will be conducted in teams of no less than two (2) Transport Agents, and during any time that a transport vehicle contains Marijuana or Marijuana Products at least one (1) agent will stay with the transport vehicle at all times;
- All transfers of Marijuana and Marijuana Products in and out of Applicant's manufacturing facility must take place in the Secure Delivery Area, highlighted on *Safety Plan Exhibit B*; and
- Applicant will ensure that safe driving education is included in onboarding and mandatory ongoing training for all Transport Agents.

Appropriate storage conditions are also vital when considering consumer safety. To this end, and as required by 935 CMR 500.105(13)(c)(1)(d), transport vehicles will be equipped to provide precise heating and air conditioning systems appropriate for maintaining correct temperatures necessary to protect against degradation of Marijuana Products; and will, in accordance with 935 CMR 500.105(13)(a)(14),be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent any Marijuana or Marijuana Products from becoming unsafe during the transportation cycle, consistent with the Federal Sanitary Transportation of Human and Animal Food Transportation Operations guidelines in 21 CFR 1.908(c).

Additional Security Measures

Applicant's *Security Plan* provides additional safety policies and procedures, such as crime prevention measures and a disaster/emergency action plan, to further ensure the safety of the workforce, summarized below.

- No contractors, vendors, or visitors are to be admitted into restricted access areas without verifying, on camera, their identity and legal status; ANY and ALL individuals on site must keep their face unobscured and recognizable. Employees are required to engage and make eye contact with all vendors and other individuals entering the facility to minimize the anonymity that is often the precursor to crimes such as robberies and theft; and
- An emergency action plan will be provided, and will set forth contingency procedures for non-security related emergencies, such as medical emergencies, bomb threats, fires, explosions, chemical release, and weather-related disasters to ensure an appropriate and orderly response.

The Commonwealth of Massachusetts

Secretary of the Commonwealth

State House, Boston, Massachusetts 02133

William Francis Galvin
Secretary of the Commonwealth

October 22, 2025

TO WHOM IT MAY CONCERN:

I hereby certify that a certificate of organization of a Limited Liability Company was filed in this office by

BURN BRIGHT, LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **September 7, 2022.**

I further certify that said Limited Liability Company has filed all annual reports due and paid all fees with respect to such reports; that said Limited Liability Company has not filed a certificate of cancellation; that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156C, § 70 for said Limited Liability Company's dissolution; and that said Limited Liability Company is in good standing with this office.

I also certify that the names of all managers listed in the most recent filing are: **NONE**

I further certify, the names of all persons authorized to execute documents filed with this office and listed in the most recent filing are: **MATTHEW NELSON**

The names of all persons authorized to act with respect to real property listed in the most recent filing are: **MATTHEW NELSON**

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

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