



Massachusetts Cannabis Control Commission

Third Party Marijuana Transporter

General Information:

License Number: MT281737
Original Issued Date: 08/12/2025
Issued Date: 08/12/2025
Expiration Date: 08/12/2026

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: DEO Enterprises Inc.

Phone Number: 617-905-5522 Email Address: 617deoenterprise@gmail.com

Business Address 1: 90 Conz St. #219K Business Address 2:

Business City: Northampton Business State: MA Business Zip Code: 01060

Mailing Address 1: 60 Dudley St. Mailing Address 2:

Mailing City: Roxbury Mailing State: MA Mailing Zip Code: 02119

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Minority-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: Denied by DPH for Certificate of Registration as an RMD in Massachusetts

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

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 100 Percentage Of Control: 100

Role: Executive / Officer Other Role:

First Name: Duane Last Name: Osborn Suffix:

Gender: Male

User Defined Gender:

What is this person's race or ethnicity?: Black or African American (of African Descent, African American, Nigerian, Jamaican, Ethiopian, Haitian, Somali), Hispanic, Latino, or Spanish (Mexican or Mexican American, Puerto Rican, Cuban, Salvadoran, Dominican, Colombian)

Specify Race or Ethnicity: Black American

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: Duane

Last Name: Osborn

Suffix:

Marijuana Establishment Name: Green Flash Delivery

Business Type: Other

Marijuana Establishment City: Boston

Marijuana Establishment State: MA

Individual 2

First Name: Duane

Last Name: Osborn

Suffix:

Marijuana Establishment Name: Boston One Nubian

Business Type: Other

Marijuana Establishment City: inactive

Marijuana Establishment State: MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 90 Conz St.

Establishment Address 2: #219K

Establishment City: Northampton

Establishment Zip Code: 01062

Approximate square footage of the Establishment: 225

How many abutters does this property have?: 11

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 |
|--|--|------|--------------------------|-------------|
| Executed HCA | HCA Certification - DEO.pdf | pdf | 679106f729756ef8763ce1de | 01/22/2025 |
| Plan to Remain Compliant with Local Zoning | Plan to Remain Compliant with Local Zoning - {DEO}.pdf | pdf | 679125b229756ef8763d45cd | 01/22/2025 |
| Community Outreach Meeting Documentation | COM Abutters 90 Conz Redacted.pdf | pdf | 6791262f3af3d30293a0c030 | 01/22/2025 |
| Community Outreach Meeting Documentation | Hampshire Gazette proof confirmed for 1:23:25.pdf | pdf | 6791316a29756ef8763d601c | 01/22/2025 |

| | | | | |
|--|--|-----|--------------------------|------------|
| Community Outreach Meeting Documentation | COm Abutter letter DEO.pdf | pdf | 679131c53af3d30293a0de7f | 01/22/2025 |
| Community Outreach Meeting Documentation | COM Attestation Form - [Signed] - {DEO} - (3.4.25).pdf | pdf | 67c80016541e85345e2136d5 | 03/05/2025 |
| Executed HCA | Northampton - DEO - HCA 2-2025 - Revised.pdf | pdf | 67ddb44d3b8f2e45c6dad2b3 | 03/21/2025 |

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 | Positive Impact Plan - {DEO Enterprises Inc.} - (3.4.25) .pdf | pdf | 67c7fd9c541e85345e213650 | 03/05/2025 |

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

| | |
|---|------------------------------|
| Role: Owner / Partner | Other Role: |
| First Name: Duane | Last Name: Osborn Suffix: |
| RMD Association: Not associated with an RMD | |
| Background Question: no | |

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

| Document Category | Document Name | Type | ID | Upload Date |
|--|---|------|--------------------------|-------------|
| Bylaws | Bylaws DEO Enterprises 2025.pdf | pdf | 679111643af3d30293a06b83 | 01/22/2025 |
| Bylaws | Cap Table DEO Enterprises 2025.pdf | pdf | 6791116829756ef8763cfcb1 | 01/22/2025 |
| Department of Unemployment Assistance - Certificate of Good standing | Cert of GS DUA - {DEO Enterprises} 2025.pdf | pdf | 6791120b3af3d30293a06cf0 | 01/22/2025 |
| Articles of Organization | Articles of Organization - {DEO}.pdf | pdf | 6791217229756ef8763d368b | 01/22/2025 |
| Secretary of Commonwealth - Certificate of Good Standing | CGS SOC - {DEO} - (3.6.25).jpeg | jpeg | 67cb5cd2541e85345e24cdf4 | 03/07/2025 |
| Secretary of Commonwealth - Certificate of Good Standing | DEO Good Certicafate 2025.pdf | pdf | 67ddb4e485fc04b7dcdf05e2 | 03/21/2025 |

No documents uploaded

Massachusetts Business Identification Number: 001738482

Doing-Business-As Name: n/a

DBA Registration City: Northampton

BUSINESS PLAN

Business Plan Documentation:

| Document Category | Document Name | Type | ID | Upload Date |
|--|---|------|--------------------------|-------------|
| Operating Agreement or Articles of Incorporation | Bylaws DEO Enterprises 2025.pdf | pdf | 679117a63af3d30293a08d8a | 01/22/2025 |
| Capitalization Table | Cap Table DEO ENTERprises 2025.pdf | pdf | 679117a929756ef8763d184a | 01/22/2025 |
| Operating Agreement or Articles of Incorporation | Articles of Organization - {DEO}.pdf | pdf | 679118113af3d30293a08e9c | 01/22/2025 |
| Proposed Timeline | Proposed Timeline - [DEO Enterprises] - {12.11.24}.pdf | pdf | 679118fb3af3d30293a09047 | 01/22/2025 |
| Proposed Timeline | Plan for Obtaining Insurance - {DEO Enterprises} - (3.4.25).pdf | pdf | 67c7f8bedc92c5a698f31f8b | 03/05/2025 |
| Business Plan | Business Plan - {DEO Enterprises} - (3.4.25) .pdf | pdf | 67c7f911541e85345e213506 | 03/05/2025 |

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

| Document Category | Document Name | Type | ID | Upload Date |
|--|--|------|--------------------------|-------------|
| Qualifications and training | Qualification and Training - {DEO} - (8.2.24).pdf | pdf | 66e50887cfa6590008e24887 | 09/13/2024 |
| Quality control and testing | Quality Control and Testing - {DEO} - (8.2.24).pdf | pdf | 66e508abcfa6590008e2489e | 09/13/2024 |
| Record Keeping procedures | Recordkeeping Procedures - {DEO} - (8.2.24).pdf | pdf | 66e508bacfa6590008e248b5 | 09/13/2024 |
| Personnel policies including background checks | Personnel Policies - {DEO} - (8.2.24).pdf | pdf | 66e508d8cfa6590008e248c9 | 09/13/2024 |
| Storage of marijuana | Storage Plan - {DEO} - (8.2.24).pdf | pdf | 66e5094894e8b80008641519 | 09/13/2024 |
| Transportation of marijuana | Transportation Plan - {DEO} - (8.2.24).pdf | pdf | 66e5096494e8b80008641533 | 09/13/2024 |
| Restricting Access to age 21 and older | Restricting access 21 - {DEO} - (8.2.24).pdf | pdf | 66e5097594e8b80008641547 | 09/13/2024 |
| Security plan | Security Plan - {DEO} - (8.2.24).pdf | pdf | 66e50992cfa6590008e24909 | 09/13/2024 |
| Inventory procedures | Inventory Procedures - {DEO} - (8.2.24).pdf | pdf | 66e50a14cfa6590008e24929 | 09/13/2024 |
| Energy Compliance Plan | Energy Compliance Plan - {DEO} - (8.2.24).pdf | pdf | 66e50a53cfa6590008e24949 | 09/14/2024 |
| Dispensing procedures | Dispensing Procedures - {DEO} - | pdf | 66e50a67cfa6590008e2495d | 09/14/2024 |

| | | | | |
|----------------------------------|--|-----|--------------------------|------------|
| | (8.2.24).pdf | | | |
| Maintaining of financial records | Maintaining Financial Records - {DEO} - (8.2.24).pdf | pdf | 66e50a8ccfa6590008e24974 | 09/14/2024 |
| Prevention of diversion | Prevention of Diversion - {DEO} - (1.20.25).pdf | pdf | 67911f923af3d30293a0a5cc | 01/22/2025 |
| Dispensing procedures | DEO Enterprises Logo.png | png | 679120c829756ef8763d30ec | 01/22/2025 |
| Diversity plan | Diversity Plan - {DEO} - (3.4.25).pdf | pdf | 67c7fde2541e85345e2135fc | 03/05/2025 |

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

HOURS OF OPERATION

| | |
|--------------------------|-----------------------|
| Monday From: 7:00 AM | Monday To: 11:00 PM |
| Tuesday From: 7:00 AM | Tuesday To: 11:00 PM |
| Wednesday From: 11:00 AM | Wednesday To: 7:00 AM |
| Thursday From: 7:00 AM | Thursday To: 11:00 AM |
| Friday From: 7:00 AM | Friday To: 11:00 PM |
| Saturday From: 7:00 AM | Saturday To: 11:00 PM |
| Sunday From: 7:00 AM | Sunday To: 11:00 PM |

DEO Enterprises Inc.

Plan to Remain Compliant with Local Zoning:

DEO Enterprises Inc. is located in the GB-zoned district of the City of Northampton and attests that it will, through its operation of a Courier delivery establishment in the City of Northampton, MA, follow and remain compliant with all local zoning requirements, including but not limited to the following sections of the Northampton Zoning Bylaw:

Building Regulations, Chapter 145, Articles I-IV, sections § 145-16-30

Building, Electrical, and Plumbing, Signage § 350-7

Off-Street parking requirements, § 350-8.1

Courier marijuana establishments **are allowed by-right in General Business** zones, off-duty vehicles are allowed to be stored off street at owner's home, parking facility, or other off street site, and no special permit or site plan is required. A certificate of occupancy is required after obtaining building permits and inspections of renovation, if applicable.

The **duration of the permits are unlimited** until a change of use and new building permit is secured at the location. No other provisions are stipulated locally.

[REDACTED]
20 FRUIT ST
NORTHAMPTON MA 01060

[REDACTED]
27 HOWARD AVE
EASTHAMPTON MA 01027

[REDACTED]
118 MAPLE ST
EASTHAMPTON MA 01027

[REDACTED]
336 COLES MEADOW RD
NORTHAMPTON MA 01060

[REDACTED]
705 NORTH FARMS RD
FLORENCE MA 01062

[REDACTED]
137 ELM ST
NORTHAMPTON MA 01060

[REDACTED]
66 PROSPECT ST
HATFIELD MA 01038

[REDACTED]
13 TRUMBULL RD
NORTHAMPTON MA 01060

[REDACTED]
1 MONARCH PLACE SUITE 2500
SPRINGFIELD MA 01144

[REDACTED]
36 KING ST
NORTHAMPTON MA 01060

[REDACTED]
81 CONZ ST
NORTHAMPTON MA 01060

[REDACTED]
P O BOX 60522
FLORENCE MA 01062

[REDACTED]
2 MAIN ST
NORTHAMPTON MA 01060

[REDACTED]
90 CONZ ST #3
NORTHAMPTON MA 01060

[REDACTED]
90 CONZ ST UNIT 4
NORTHAMPTON MA 01060

[REDACTED]
P O BOX 60522
FLORENCE MA 01062

[REDACTED]
36 FRUIT ST
NORTHAMPTON MA 01060

[REDACTED]
48 HOLY FAMILY RD APT 120
HOLYOKE MA 01040

[REDACTED]
22 CONZ ST
NORTHAMPTON MA 01060

[REDACTED]
12 OAK RIDGE CIR
EASTHAMPTON MA 01027

[REDACTED]
6-8 WRIGHT AVE
NORTHAMPTON MA 01060

[REDACTED]
115A CONZ ST
NORTHAMPTON MA 01060

[REDACTED]
74 CONZ ST
NORTHAMPTON MA 01060

[REDACTED]
P O BOX 60376
FLORENCE MA 01062

OUTREACH MEETING

The Marijuana Transporter entity, DEO Enterprises Inc. is giving notice of a Community Outreach Meeting on February 6, 5:15pm, and will house the corporate records of the Marijuana Transporter companies. No deliveries, personnel, or marijuana products will be at the building but a community meeting is a state requirement. There will be an opportunity for the public to ask questions or, email ezra@blueskiescan.com.

January 23

4442373

DEO Enterprises Inc.
90 Conz St. unit 219K
Northampton, MA 01060


To: Abutters within 300' of 90 Conz St.
and Northampton City Departments

January 20, 2025

Dear Abutters and City of Northampton,

The Third Party Marijuana Transporter (Existing Licensee) entity above is giving notice of a Community Outreach Meeting on February 6, 2025, at 5:15 pm at 90 Conz St, suite 219K, Northampton, MA 01060, their proposed location(s.) This is a private office that will house the corporate records of the Marijuana Transporter company. No deliveries, personnel, marijuana products, vehicles, or any operations will take place at the site but a community meeting is a state requirement. There will be an opportunity for the public to ask questions or, email ezra@blueskiescan.com

Sincerely,



Ezra Perzybok
Consultant to DEO Enterprises Inc. a Social Equity-owned company

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):
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:

b. Name of publication:

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:

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:

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



Name of applicant:

Name of applicant's authorized representative:

Signature of applicant's authorized representative:



DEO Enterprises Inc.

Positive Impact Program

Introduction

This program will meet the spirit and objectives of state law M.G.L. Ch. 94G §4 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.”

The Commission has identified the groups this plan is intended to impact as the following:

- 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
- Massachusetts residents with parents or spouses who have drug convictions.
- The above groups or other residents of Brockton, an Area of Disproportionate Impact

Acknowledgments

The applicant 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.

No actions taken, or programs instituted by the applicant will violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

No donation or program to support any specifically named organizations or the furtherance of their goals have been proposed as this is a direct mentor-to-mentee program.

The progress or success of this plan will be documented upon renewal (one year from provisional licensure and each year after.)

Community Presence in an ADI: As transporter operations are solely delivering between a business and another business, with all other activity taking place remotely, Holyoke is the closest ADI to Northampton. Any work for ADIs as of this writing will focus on Holyoke.

Programs:

1. Hiring staff from ADIs:

- a. We will utilize online platforms such as LinkedIn, Indeed.com, City Hall, and local newspapers to post job opportunities targeting Holyoke residents. Additionally, we will collaborate with local workforce development programs, career centers, and community organizations to expand outreach efforts. Job postings will be conducted at least annually, with outreach effectiveness reviewed quarterly to ensure continuous improvement and alignment with hiring goals.

2. For Engagement with SE-Owned Businesses:

- a. Collaborate with industry-specific professionals, ancillary and licensed, with owners designated as SE, and identify potential SE-owned business partners through our contacts and networking.
- b. As for finding ancillary businesses, our network within the industry knows of consultants, professionals, and contractors whose owners are certified as Social Equity or Economic Empowerment and operating their businesses while they pursue or sustain participation in the industry. Our engagement with these companies will be through word of mouth among the SE/EE cohort networking events established by the CCC equity department, email groups like sociaequity2@googlegroups.com, attending conferences and industry events, and other means.

Goals:

These above programs will facilitate direct assistance in the achievement of some or all of the following goals for at least one social equity business and hiring Holyoke PTGs:

1. Hiring from ADIs:

- a. Hire at least 50% of new employees annually from Holyoke.

2. Engage with at least one SE-owned ancillary business.

- a. Form partnerships with at least one Social Equity (SE)-owned ancillary business annually and one SE-owned operating licensee.

Measurements and Metrics:

1. For Hiring from ADIs:

- a. Monitor the number and percentage of new hires from Holyoke, with a target of hiring at least one new employee per year.

2. For Engagement with SE-Owned Businesses:

- a. Track the number of SE-owned businesses engaged annually, aiming for at least one new partnership or contract per year.
- b. Did we engage with at least one Social Equity program licensee who is operating?

Corporate Bylaws of DEO Enterprises Inc.

Article I: Name and Purpose

1. **Name:** The name of the corporation is DEO Enterprises Inc.
2. **Purpose:** The purpose of the corporation is to engage in any lawful business for which a corporation may be organized under the laws of the State of Massachusetts; Licensed Third Party Marijuana Transporter.

Article II: Principal Office The principal office of the corporation is located at 90 Conz St Northampton MA 01060, or at such other place in the future as may be determined by the sole shareholder.

Article III: Shareholder

1. **Sole Shareholder:** Duane Osborn is the sole shareholder of DEO Enterprises Inc.
2. **Ownership:** The sole shareholder owns 100% of the corporation's issued shares.

Article IV: Directors

1. **Number of Directors:** The corporation shall have one director unless otherwise determined by the sole shareholder.
2. **Appointment:** The sole shareholder, Duane Osborn, shall serve as the sole director until resignation or replacement.

Article V: Officers

1. **Officers:** The corporation shall have the following officers: President, Secretary, and Treasurer.
2. **Appointments:** Duane Osborn shall serve as the President, Secretary, and Treasurer until resignation or replacement.

Article VI: Meetings

1. **Annual Meetings:** The corporation shall hold an annual meeting of the sole shareholder, unless waived by the sole shareholder.
2. **Quorum:** The presence of the sole shareholder constitutes a quorum.
3. **Voting:** All decisions shall be made by the sole shareholder, Duane Osborn.

Article VII: Record Keeping

1. **Corporate Records:** The corporation shall maintain complete and accurate records of all meetings, resolutions, and financial transactions at its principal office.

2. **Inspection Rights:** The sole shareholder has the right to inspect and copy all corporate records at any reasonable time.

Article VIII: Amendments These bylaws may be amended or repealed by the sole shareholder at any time.

Article IX: S-Corporation Compliance The corporation shall comply with all requirements of Subchapter S of the Internal Revenue Code, including restrictions on the number and type of shareholders.

Certification I, Duane Osborn, sole shareholder of DEO Enterprises Inc., certify that the foregoing bylaws were adopted as the bylaws of the corporation as of the date below.

Dated: 1/20/25

Signed:

Duane Osborn
Sole Shareholder, Director, and Officer

Cap table DEO Enterprises Inc.

| Owner | Ownership |
|--------------|-----------|
| Duane Osborn | 100% |

D

The Commonwealth of Massachusetts

William Francis Galvin

Secretary of the Commonwealth

One Ashburton Place, Boston, Massachusetts 02108-1512

Articles of Organization

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

ARTICLE I

The exact name of the corporation is:

DEO Enterprises, Inc.

ARTICLE II

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

ARTICLE III

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

| WITHOUT PAR VALUE | | WITH PAR VALUE | | |
|-------------------|------------------|----------------|------------------|-----------|
| TYPE | NUMBER OF SHARES | TYPE | NUMBER OF SHARES | PAR VALUE |
| | | Common | 275,000 | .01 |
| | | | | |
| | | | | |

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

ARTICLE IV

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

None

ARTICLE V

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

None

ARTICLE VI

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

See Attachment VI

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

_____, Secretary

ARTICLE VII

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

Effective Date January 1, 2024

ARTICLE VIII

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

- a. The street address of the initial registered office of the corporation in the commonwealth:
60 Dudley Street, Roxbury MA 02119
- b. The name of its initial registered agent at its registered office:
Duane E. Osborn
- c. The names and street addresses of the individuals who will serve as the initial directors, president, treasurer and secretary of the corporation (an address need not be specified if the business address of the officer or director is the same as the principal office location):

President: **Duane E. Osborn**

Treasurer: **Duane E. Osborn**

Secretary: **Duane E. Osborn**

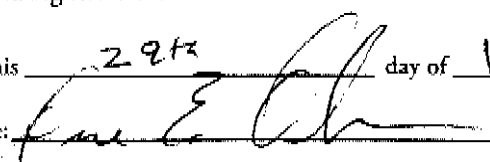
Director(s): **Duane E. Osborn**

- d. The fiscal year end of the corporation:
December 31
- e. A brief description of the type of business in which the corporation intends to engage:
Merchandise, Entertainment, Transportation, Finance
- f. The street address of the principal office of the corporation:
60 Dudley Street, Roxbury, MA 02119
- g. The street address where the records of the corporation required to be kept in the commonwealth are located is:

60 Dudley Street, Roxbury, MA 02119, which is
(number, street, city or town, state, zip code)

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

Signed this 29th day of December, 2023, by the incorporator(s):

Signature: 

Name: Duane E. Osborn

Address: 60 Dudley Street, Roxbury, MA 02119

ATTACHMENT TO ARTICLE VI

1. Personal Liability of Directors to Corporation. No director shall have personal liability to the corporation for monetary damages for breach of his or her fiduciary duty as a director notwithstanding any provision of law imposing such liability, provided that this provision shall not eliminate or limit the liability of a director (a) for any breach of the director's duty of loyalty to the corporation or its shareholders, (b) for acts or omissions not in good faith or which involve intentional misconduct or a knowing violation of law, (c) for improper distributions under Section 6.40 of Chapter 156D of the General Laws of Massachusetts, as amended from time to time ("Chapter 156D"), or any successor provision to such Section, or (d) for any transaction from which the director derived an improper personal benefit.

2. Shareholder Action Without a Meeting by Less Than Unanimous Consent. Action required or permitted by Chapter 156D to be taken at a shareholders' meeting may be taken without a meeting by shareholders having not less than the minimum number of votes necessary to take the action at a meeting at which all shareholders entitled to vote on the action are present and voting.

3. Authorization of Directors to Make, Amend or Repeal Bylaws. The board of directors may make, amend or repeal the bylaws in whole or in part, except with respect to any provision thereof which by virtue of an express provision in Chapter 156D, the Articles of Organization or the bylaws requires action by the shareholders.

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:

December 29, 2023 02:35 PM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth



William Francis Galvin
Secretary of the
Commonwealth

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

March 6, 2025

TO WHOM IT MAY CONCERN:

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

DEO ENTERPRISES, INC.

is a domestic corporation organized on **January 1, 2024**, under the General Laws of the Commonwealth of Massachusetts.

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



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

William Francis Galvin

Secretary of the Commonwealth

Processed By: AG



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

mass.gov/dor

Letter ID: L1901397920
Notice Date: March 14, 2025
Case ID: 0-002-787-668



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



DEO ENTERPRISES INC
60 DUDLEY ST
ROXBURY MA 02119-1707

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, DEO ENTERPRISES INC dba:DEO ENTERPRISES INC is in compliance with its tax obligations under Chapter 62C of the Massachusetts General Laws.

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

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

What if I have questions?

If you have questions, call us at (617) 887-6400, 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

Third Party Transporter: Business Plan

DEO ENTERPRISES INC.

Executive Summary

DEO Enterprises Inc. is a corporation formed in the Commonwealth of Massachusetts to develop a Third party marijuana transporter to delivery wholesale product between businesses and specifically to pick up wholesale product for its Duane's marijuana delivery operator (MDO).

The Company's objective is a two phase approach. First is to obtain a Provisional license for Transporter from the Cannabis Control Commission. Upon the granting of a Provisional license, phase two will be to begin pickup of wholesale product for the MDO. As systems are in place, other entities will be marketed to for their pickups and deliveries. To save costs, the 'location' will be minimal and will not contain a vault as no product is intended to be purchased or stored by the entity. This is merely to facilitate wholesale product delivery between businesses.

Core Values: Service and Community:

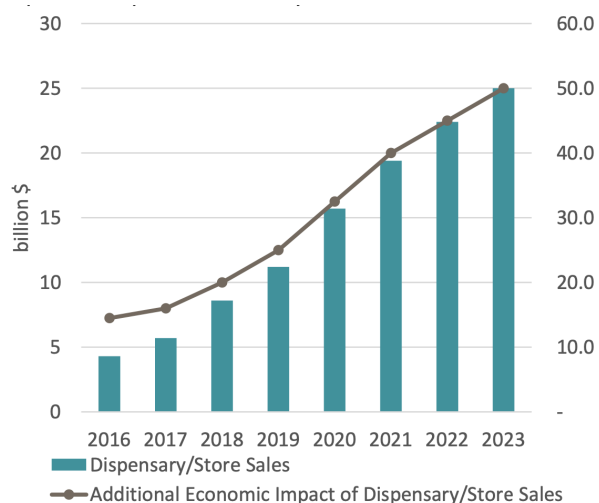
Integrity Our company will maintain the highest level of compliance with regulations and requirements for provisional licensure.

Entrepreneurship We seek to leverage the value of a license to secure private or public funding and to increase Black net wealth in the state.

Cannabis Marketplace

In 2008 Massachusetts voters decriminalized the possession of small amounts of cannabis and in 2012 Massachusetts legalized medical cannabis. In November 2016, Massachusetts voters approved a ballot initiative legalizing the recreational use of cannabis for adults 21 years of age and older.

The larger legal cannabis market in North America generated nearly \$30 billion in 2020 and is estimated to grow to \$50 billion by the end of 2023. In March of 2023, the burgeoning cannabis industry in



Sources: MJBizdaily Factbook, Arcview Market Research, BDS Analytics

Massachusetts alone surpassed the \$4 billion mark in sales since legalization. The sales revenue was derived from the sale of nearly 100,000 different products. On that \$4 billion the Commonwealth reaped more than \$800,000,000 in tax revenue from a 6.25% sales tax, a 10.75% excise tax, a 3% municipal tax, and a controversial local impact fee option for cities and towns, up to 3% of gross sales.

One of the secondary markets in the hyper regulated market is the supply and demand of licensed entities sought by cash flush and time poor investors. We feel this business opportunity of securing this location and licensing it will provide a high return on investment if a company wanted to purchase an operating Transporter license.

Customer Safety and Site Security

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

At a minimum, the security plan will detail a system that consists of vehicle cameras, hard-wired GPS, and alarmed vehicles.

Operations and Management

This one-vehicle entity will be managed by Duane Osborn, a current operator with a MDO license.

Marketing

For the purposes of our two-phase strategy, marketing of a Third Party Transporter business to licensees will commence when the process of pickup for Duane's other entity is stabilized. Consultants, law firms, other operators, and venture capitalists will be marketed to, to demonstrate the potential earnings of this license if Duane chooses to sell. We believe our investment in Phase 1 will lead to DEO delivering for other businesses.

Financials

DEO is the recipient of a Social Equity grant which will fund the licensing of the entity. Startup costs are low and DEO will apply for forthcoming grants as well.

Based on the funds available to the Company and the projected capital and operating expenses necessary to secure a Provisional license, DEO is strongly positioned to successfully execute its business and operation plans for phase one. Phase 2 will be addressed post-licensure. Although the peak license and entity sales market has passed, we anticipate a license and entity sale or partnership for this location to be a good ROI.

Projections for Phase two to operations:

We calculate revenue of an operational Transporter at this location based on a \$150 average transport per customer, roughly 2 customers per day, open 365 days a year.

| Projected Revenue | Yr 1 | Yr 2 | Yr 3 |
|--------------------------|-----------|-----------|-----------|
| Sales | \$109,500 | \$157,500 | \$169,000 |
| Expenses | \$54,000 | \$78,750 | \$81,200 |
| Tax | \$35,000 | \$47,250 | \$51,300 |
| Impact fee, town | \$0 | \$0 | \$0 |
| Net | \$30,000 | \$31,500 | \$36,500 |

Detailed Description of Qualifications, Jobs, and Intended Trainings for Marijuana Transporter Agents:

1. Marijuana Establishment Agents shall first take the Basic Core Curriculum. *935 CMR 500.105(2)*
2. Once a Marijuana Establishment is designated a Responsible Vendor, all our Company Agents employed by us that are involved in the handling or sale of Marijuana for adult use shall successfully complete the Basic Core Curriculum within 90 days of hire. *935 CMR 500.105(2)*
3. After successful completion of the Basic Core Curriculum, each Marijuana Establishment Agent involved in the handling or sale of Marijuana for adult use shall fulfill the four-hour RVT requirement every year thereafter for the Marijuana Establishment to maintain designation as a Responsible Vendor. *935 CMR 500.105(2)*

a. Job Classifications and Requirements:

- i. All employees must be trained on their job-specific duties prior to performing their job functions.
 - a. All employees must receive a minimum of eight (8) hours job-specific training each year.
 - b. All current owners, managers, and employees must complete the Responsible Vendor Program. Employees must complete the program within 90 days of being hired.
 - c. Responsible Vendor Program documentation will be retained for four (4) years.
 - d. All employees working with inventory will receive METRC training
- ii. **Warehouse and or Inventory Manager** - The manager is the head of the facility. The manager must interface with staff, law enforcement, vendors, and others. The principal responsibility of the manager is to coordinate and facilitate the transactions of the warehouse, oversee routes, dispatch, and employees. They must maintain records, have contact with suppliers, embrace customer service and understand marketing. They will train employees and decide which products to carry and determine best pricing based on market conditions. They are responsible for keeping up with all changes in local and state law regarding operation of the facility. The most important job of the manager is to ensure the security and integrity of our inventory and keep operations running smoothly.
- iii. **Transporter Agent** - The company has a need for delivery professionals who can communicate articulately and passionately with customers, keep clear records, follow protocol, and safely drive vehicles. Desirable backgrounds include previous marijuana vertical experience, retail sales, pharmacy, education, delivery, and customer service. Knowledge of cannabis, the varieties of cannabis, and their effects is highly relevant. A transporter agent will maintain records in accordance with the Operations Manual, serve customers, and be mindful and

vigilant in terms of security, diversion, and facility cleanliness. Transporter Agents will be trained by the manager alongside whom they will work to learn the total operation of the Marijuana Transporter company. This position may be full-, or part-time.

- iv. **Delivery Prep agent** – Our company will require delivery prep agents to prep orders, oversee inventory directives, prepare customer orders and access the vault and prep rooms. Knowledge of warehousing, POS, the ability to lift 40 pounds or greater, and a commitment to team morale in small spaces are essential. Full or part-time. Prep agents must be detailed, efficient, mindful, and vigilant in terms of security, diversion, and facility cleanliness.

b. Employee Qualifications and Selection

- i. Our company is constantly looking for motivated, friendly, articulate, and passionate people to work with our customers to provide them with the best service for their marijuana product transportation needs. We are looking for people with the above attributes and are willing to train others in order to have a diverse workforce. Some of the desirable backgrounds we are looking for include marijuana vertical experience, delivery, education, and customer service. We tend to train all employees in the following subjects, but tailor each topic to meet the needs required by individual roles:
 - 1. Cannabis Science
 - 2. Methods of Extraction
 - 3. Methods of Ingestion
 - 4. Marijuana use
 - 5. Harm Reduction Methods
 - 6. Sensible Cannabis Use
 - 7. Customer Relations
 - 8. Massachusetts Cannabis Law
- c. Our company seeks all types of help for our marijuana transportation operation, both warehouse, and transport vehicle agents. Typical responsibilities include:
 - i. Product Transportation
 - ii. Packaging labeling and inventory
 - iii. Sanitation and maintenance of the facility
 - iv. Standard business and management roles such as, account management, administration, inventory management, dispatch, customer consultation, etc.

Quality Control and Testing

1.1. Incoming marijuana inventory

- 1.1.1. In accordance with 935 CMR 500.160 (9), no marijuana product shall be sold or otherwise marketed for adult use that has not first been tested by an independent, state-licensed, testing laboratory and deemed to comply with the standards required under 935 CMR 500.160
- 1.1.2. We must ensure that only the leaves and flowers of the female marijuana plant are packaged or prepared accordingly in a safe and sanitary manner as prescribed below:
 - 1.1.2.1. Well cured and generally free of seeds and stems;
 - 1.1.2.2. Free of dirt, Sand, debris, and other foreign matter;
 - 1.1.2.3. Free of contamination by mold, rot, other fungus, and bacterial diseases;
 - 1.1.2.4. Prepared and handled on food-grade stainless steel tables; and
 - 1.1.2.5. Packaged in a secure area.
- 1.1.3. All of the raw cannabis materials used in our products are tested by our cultivation suppliers. The initial quality control and testing of these raw cannabis materials is the responsibility of these suppliers. That being said, there are certain steps that we can take to ensure that the products entering our inventory are tested, have achieved the correct quality, and are stored and rotated in a manner that best ensures their continued quality throughout their shelf-life.
 - 1.1.3.1. All products must be thoroughly checked upon arrival at our facility in accordance with **Transportation of Marijuana and Inventory Control and Reconciliation** protocols above.
 - 1.1.3.2. Should the accompanying test report indicate contaminant levels in excess of those accepted by DPH protocols identified in 935 CMR 500. 160 (1), the Operations Manager will immediately notify senior management who will notify the commission within 72 hours.
 - 1.1.3.3. Together, the Operations Manager, the testing laboratory, and the original producer will determine whether the product is suitable for remediation or whether the entire batch must be destroyed in accordance with 935 CMR 500.105 (12).
 - 1.1.3.4. Each of the three parties should submit a report on the incident to the Commission.
 - 1.1.3.5. The Operations Manager should check each item and identify any that are outdated, damaged, mislabeled, contaminated or compromised. Any such products should be set aside for disposal.
 - 1.1.3.6. Once the products enter our inventory it is the Operations Manager's responsibility to ensure that:
 - 1.1.3.6.1. Stock is efficiently rotated to ensure that older product is used before newer product.
 - 1.1.3.6.2. All stock is appropriately stored to prevent spoiling and damage to the product.

1.2. Outgoing marijuana inventory

- 1.2.1. In accordance with 935 CMR 500.160 (9), no marijuana product shall be sold or otherwise marketed for adult use that has not first been tested by an independent, state-licensed, testing laboratory and deemed to comply with the standards required under 935 CMR 500.160

- 1.2.2. All of our products are sold pre-packaged and tested by a state-licensed, marijuana test laboratory. The final quality control and testing of our products is the responsibility of both the test laboratory and CCE CAT, LLC. There are certain steps that we must take to ensure that the products leaving our inventory for delivery to licensed retail establishments are tested, have achieved the correct quality, and are stored and rotated in a manner the best ensures their continued quality throughout their shelf-life.
- 1.2.3. All products must be thoroughly checked prior to shipment from our facility in accordance with **Transportation of marijuana** and **Inventory Control and Reconciliation** protocols above.
- 1.2.4. No production batch may be cleared for shipment before a sample has been submitted to the testing lab for analysis and the relevant test report has been received by us and entered into the database.
- 1.2.5. Should the test report indicate contaminant levels in excess of those accepted by DPH protocols identified in 935 CMR 500. 160 (1), the Operations Manager will immediately notify senior management who will notify the commission within 72 hours.
- 1.2.6. Together, the Operations Manager, the testing laboratory, and the original cultivator will determine whether the product is suitable for remediation or whether the entire production batch must be destroyed in accordance with 935 CMR 500.105 (12).
- 1.2.7. Each of the three parties should submit a report on the incident to the Commission.
- 1.2.8. The Operations Manager should check each item and identify any that are outdated, damaged, mislabeled, contaminated or compromised. Any such products should be set aside for disposal.
- 1.2.9. Whilst our products remain in our inventory it is the Operations Manager's responsibility to ensure that:
 - 1.2.9.1. Stock is efficiently rotated to ensure that older product is sold before newer product.
 - 1.2.9.2. All stock is appropriately stored to prevent spoiling and damage to the product.

1.3. Hygiene

- 1.3.1. All agents whose job includes contact with marijuana is subject to the requirements for food handlers specified in 105 CMR 300.000.
- 1.3.2. Any agent working in direct contact with marijuana shall conform to sanitary practices while on duty, including:
 - 1.3.2.1. Maintaining adequate personal cleanliness; and
 - 1.3.2.2. Washing hands appropriately as per 935 CMR 500.105 (3)
- 1.3.3. Hand-washing facilities shall be located in production areas and where good sanitary practices require employees to wash and sanitize their hands.
- 1.3.4. There shall be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations.
- 1.3.5. Litter and waste shall be properly removed so as to minimize the development of odor and the potential for the waste attracting and harboring pests.
- 1.3.6. Floors, walls, and ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair.
- 1.3.7. All contact surfaces shall be maintained, cleaned, and sanitized as frequently as necessary to protect against contamination.
- 1.3.8. All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana.
- 1.3.9. Water supply shall be sufficient for necessary operations.

- 1.3.10. Plumbing shall be of adequate size and design and maintained to carry sufficient quantities of water to required locations throughout the establishment.
- 1.3.11. The establishment shall provide it employees with adequate, readily accessible toilet facilities.
- 1.3.12. Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination.

Recordkeeping procedures

- i. Pursuant to 935 CMR 500.000, company records will be available for inspection by the Commission, upon request.
- ii. The following business records shall be properly maintained:
 1. Assets and liabilities;
 2. Monetary transactions
 3. Books of accounts;
 4. Sales records; and
 5. Salary and wages paid to each employee.
- iii. The company will maintain these and the following written records that are required and subject to inspection, as well as any additional documentation that it may be directed to record by the Commission:
- iv. **Written Operating Procedures** as required by 935 CMR 500.105 (1) The duty manager has copies of the company operating procedures.
 - a. It is the responsibility of all employees to carefully read, understand and follow these operating procedures.
 - b. All employees are responsible for ensuring that these operating procedures are followed.
 - c. Any deviation from standard operating procedures must be authorized by the duty manager or your immediate supervisor.
 - d. These operating procedures will be revised from time-to-time and minor adjustments will likely be made. All revisions will be carefully noted and the operating procedures manual updated.
 - e. Any material changes will be communicated to the Commission
 - f. Inventory records as required by 935 CMR 500.105(8);
- v. **Inventory records include:**
 - a. Shipping manifests
 - b. Delivery Manifests
 - c. Delivery and unpacking video recordings
 - d. Daily sales stock withdrawal and return reports
 - e. Weekly inventory reports
 - f. Product return reports
 2. Shipping manifests - All deliveries will be accompanied by a shipping manifest. Once this document has been used to verify the shipment it must be scanned for digital storage and the original placed in the appropriate ring binder and stored in the records cabinet.
 3. Delivery and unpacking video recordings - All deliveries will be recorded using a hand-held video recorder. These recordings will be transferred to digital storage medium, clearly labelled with the date and manifest number(s) and stored in the records cabinet. Any and all

variances from the manifest must be reported in accordance with standard operating procedures.

4. Daily sales stock withdrawal and return reports - Each day, items will be removed from the main storage vault and placed in the counter area for sale. These items will be carefully recorded at the time of withdrawal. Unsold sales stock will be recorded on the same sheet when returned to the storage vault each evening.
 - a. If, during the course of the day, additional items must be withdrawn from the storage vault, they too will be added to the withdrawal report and accounted for upon the return of sales stock to the storage vault.
 - b. Any and all variances must be reported in accordance with standard operating procedures. All inventory records are to be digitized and a hard copy kept in the records cabinet.
5. Weekly inventory reports - Each week, the duty manager, together with another licensed employee will conduct an inventory of all goods in the storage vault. Any and all variances must be reported in accordance with standard operating procedures. All inventory records are to be digitized and a hard copy kept in the records cabinet.
6. Seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105(8)(e);
7. The company uses a proprietary Seed-to-sale tracking software that allows cultivators, manufacturers, retailers, the Commission and others to quickly and easily track marijuana and marijuana products from propagation to sale.
8. Our establishment receives marijuana, and marijuana products in pre-packed, shelf-ready packaging.
9. Once goods are delivered and manifests verified, all products - each individual unit for sale - must be entered into the Seed-to-sale tracking software in order to maintain an unbroken chain of custody.
10. All goods pertaining to a specific manifest will be entered into the system as a batch. Where applicable, a report pertaining to these items will be generated on the seed-to-sale software, printed out, and securely attached to the manifest and stored in accordance with section 2 (b) of this operating procedure.

vi. **Personnel records:**

1. All personnel files are to be stored in the records cabinet
2. The employee handbook contains a job description for each employee and volunteer position in the company. A signed copy of the relevant job description for each employee will also be kept in the individual personnel record of each employee.

3. The company organizational chart will be clearly posted in the office area but may also be found the operations manual and employee handbook.
4. A personnel record for each marijuana establishment agent shall be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and shall include, at a minimum, the following:
 - a. all materials submitted to the Commission pursuant to 935 CMR 500.030(2);
 - b. documentation of verification of references; the job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision
 - c. documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
 - d. documentation of periodic performance evaluations;
 - e. a record of any disciplinary action taken.
 - f. notice of completed responsible vendor and eight-hour related duty training.
 - g. records of any health and safety related incidents
5. A staffing plan that will demonstrate accessible business hours and safe cultivation conditions for the current and following week will be clearly posted in the office area. A copy of each staffing plan will be stored for future reference in the appropriate ring binder in the records cabinet.

vii. Personnel policies and procedures

1. All personnel policies and procedures are clearly outlined in the employee handbook, a copy of which is available to all employees.
2. Certain specialized procedures are contained in the security plan.
3. All new employees will be required to read the employee handbook and security plan, undergo basic security training and sign a document acknowledging receipt of each and all of these elements. This acknowledgement will be stored with their individual personnel record.
4. All personnel files are to be stored in the records cabinet
5. All employees will be subject to a state-mandated background check. Background check reports obtained in accordance with 935 CMR 500.030 will be digitized and a hard copy placed into the individual personnel records
6. All records of waste disposal must be maintained pursuant to 935 CMR 500.105(12).
7. All waste records should be maintained for at least three years.

8. In the course of normal operations small amounts of marijuana waste may be generated from (for example) broken packaging, or customer returns. All marijuana waste must be disposed of in accordance with 935 CMR 500.105 (12).
9. All marijuana waste will be placed in a ziplock bag and deposited into the locked disposal container for inventory at the end of the day. Each item for disposal must be weighed, recorded, and entered into the inventory reconciliation report in accordance with the company's security plan.
10. The items disposed of and recorded in the inventory reconciliation report must also be entered in the Metrc seed-to-sale tracking software to ensure the completion of an unbroken chain of custody.
11. At least two licensed marijuana agents must witness and document this process.
12. Such documentation shall be retained for a minimum of three years or longer if so directed by the Commission.

viii. Security Device Log

1. The issue and return of all security devices such as swipe cards, keys, codes and combinations must be noted in the security device log.
 2. Employees acknowledge the receipt or return of such devices by signing this log.
 3. Recording the issue and return of all security devices is the responsibility of the duty manager or senior management as required in the security plan.
 4. The issue of security devices may only be authorized by the duty manager or senior management as required in the security plan.
 5. The issue of codes and combinations is acknowledged by signing the relevant entry in the security device log. On NO account may the actual code or combination be noted or written down, either in the security device log or elsewhere. See the security plan for additional details.
- ix. Following closure of a Marijuana Establishment, all records will be kept for at least two years at the expense of our Marijuana Establishment and in a form and location acceptable to the Commission.

Personnel Policies: Marijuana Transporter

Code of ethics and Business Conduct;

As a matter of Company policy, we hereby provide this Code of Ethics and Business Conduct. It effectively serves as a guide to acceptable business conduct for all employees. Because they represent the Company and our brand, we expect everyone who works for us to demonstrate exemplary standards of ethics and integrity. Therefore, our employees must therefore abide by the following principles.

Foster Trust and Belief

We cannot succeed as a business without the trust and confidence instilled in our employees, customers and shareholders. We earn it by keeping our promises, acting with honesty and integrity and reaching company goals solely through proper conduct.

Accordingly, the key question to ask in any decision-making process is: will this establish or enhance trust and belief in our business? Will it create an atmosphere conducive to ongoing positivity and success? Will I be able to deliver what I've promised without sacrificing quality or compromising my personal and professional integrity? Remember, the only way to build upon existing trust and belief in our business is with affirmative answers to all of these questions.

Foster Respect in the Workplace

As a business predicated on fairness and positivity, we believe an effective workplace can only exist when employees are fully committed to treating one another with respect.

Furthermore, as an equal employment/affirmative action employer, we are compelled to provide a workplace devoid of discrimination and/or abusive, offensive or harassing conduct. Any employee who experiences harassment or discrimination should report the matter to his or her direct supervisor or to someone in Human Resources.

Foster Constructive Dialogue and a Forum Where Employees Can Freely Voice Concerns

We equate effective communication with respect. We also believe that any employee should feel free to voice any concern about work-related matters without fear of reprisal. This means that it is up to any employee in a supervisory position to establish and maintain an atmosphere conducive to open and honest communication.

The company is responsible for the comprehensive investigation of any reported matter pertaining to questionable or unethical behavior. Appropriate action will be taken in any and all cases where there is a valid finding of wrongful conduct. All employees should also be aware that intimidation, attempted intimidation and/or retaliation (attempted or otherwise) against a

co-worker who has reported alleged wrongdoing is unacceptable and will be dealt with accordingly.

Lead by Example

Hypocrisy at any level is unacceptable. This means we hold our leaders (our officers/executives, directors and upper and middle management) to the same standards as any other employees. We therefore expect their conduct to reflect their belief in and willingness to abide by this Code. Any failure to do so on their part will be dealt with accordingly.

Code of Ethics

This Code is only effective as long as: designated supervisory personnel use applicable policies and procedures to facilitate the resolution of any ethical questions or concerns brought to their attention. Therefore, reports raising any such questions or concerns should not be viewed as anything other than a valid form of workplace communication and welcomed as such.\

Compliance with all Applicable Policies and Laws

Compliance with all applicable local, state, federal and foreign laws is a fundamental aspect of our commitment to integrity. An individual understanding of relevant company policies, laws, rules and regulations is also required. Accordingly, any employee with doubts about whether potential action complies with applicable law or Company policy should not take any action without obtaining the advice of a relevant expert. Each and every employee is responsible for preventing and reporting violations or potential violations.

Competition

Principled competition is the lifeblood of a free market economy. Therefore, we welcome and pledge to engage in such competition. This means our products and services will only be sold based on factors deemed fair and reasonable given applicable market conditions. This also means we will not engage in any collusion, conspiracy or any other inappropriate/illicit practices with regards to pricing. Finally, we will not offer to make or request unlawful payments or similar recompense in return for the purchase of our goods or the sales of its products or services.

Proprietary Information

We will abide by all applicable laws, rules and regulations pertaining to the acquisition and use of Intellectual Property. Specifically, we will not obtain or try to obtain a competitor's trade secrets or other proprietary or confidential information; nor will we condone or participate in improper use, copying, distribution or alteration of software or other intellectual property.

Safeguarding Inside Information

The deliberate or inadvertent disclosure in any forum of any inside information regarding the company, its business practices, strategies, financial status, operational results or similar information is strictly prohibited. Employees tasked with crafting presentations or proposals should be especially mindful of these restrictions.\

Avoid Conflicts of Interest

Any and all relationships or activities that actually compromise or could potentially compromise any employee's fairness or objectivity should be avoided. In this context, professional integrity is paramount. This means that use of company property or information for personal gain is strictly prohibited.

It is sometimes difficult to determine whether certain activity constitutes a conflict of interest. Any employee with doubts about whether certain conduct actually is or could be construed, as conflict of interest should consult a supervisor before taking any action.

Accepting Professional Courtesies

It is not unusual for professional courtesies to be extended to company employees from time to time. However, such courtesies should not be expected and requesting them is strictly forbidden. Although there is no prohibition against the occasional acceptance of unsolicited professional courtesies, employees should not feel obligated to accept them. Employees in key decision-making positions should be wary of accepting any professional courtesy that could potentially or actually have an unfavorable impact on our reputation. If any employee feels uncomfortable accepting or has any misgivings about accepting a professional courtesy, the best course of action is to decline politely.

Offering Professional Courtesies

In the routine course of business, it is not unusual to offer professional courtesies. Making such offers is acceptable as long as it is not done, or cannot be perceived as being done to curry favor with or otherwise influence the recipient. The use of personal funds or resources within this context is expressly prohibited. Accounting for business courtesies should comply with approved company procedures.

The gifting of certain promotional items is generally acceptable, as long as such activity complies with acceptable professional norms. Employees with questions or concerns about such activity should consult their direct supervisor or manager. The approval of other courtesies such as meals, refreshments or entertainment of reasonable value, will be granted as long as:

- The activity does not violate or appear to violate any applicable laws, rules, regulations or standards of conduct.

- The professional courtesy conforms to applicable norms, is only offered occasionally and is not excessive.
- The professional courtesy is properly documented.

Truthful Public Disclosures

We will ensure that any and all financial information made available to the investing and general public in any format is truthful, timely and fully explained. This obligation applies to all employees from the CFO down, who are in any way responsible for the preparation of such information. Any inadvertent or deliberate inaccuracy in or falsification of such information is unacceptable; and any concerns about the veracity or accuracy of such material should be immediately directed to the compliance officer.

Corporate Recordkeeping

We create, retain and dispose of our official documents as part of our normal course of business in accordance with applicable company policies and procedures; and in compliance with all regulatory and legal requirements.

All corporate records must be factual, exact and absolute, and company data must be promptly and accurately documented in our books in accordance with all relevant internal and external accounting practices.

We must not unduly affect, influence or mislead any audit, nor interfere with any auditor engaged to perform an independent audit of company records, processes or internal controls.

Accountability

Each and every employee must familiarize himself or herself with this Code and act accordingly. Each and every employee is ethically obligated to ask questions if he or she is unsure of company policy. Each and every employee is ethically obligated to contact the Human Resources department if he or she has any concerns about compliance with or violations of this Code. The values and principles included herein are taken seriously, and violations are cause for disciplinary action up to and including termination of employment.

Protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers and other business partners is key to our success. This includes but is not limited to pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential suppliers and vendors. The disclosure of such information without a valid business or legal purpose and proper authorization is not permitted and will not occur under any circumstances.

Use of Company Assets

Company assets, including time, material, equipment and information, are provided for professional use. There is no prohibition of occasional personal use as long as it is not disruptive and does not harm job performance. Employees and those who represent the company are entrusted with responsible use of such material. Managers are responsible for the material assigned to their departments and are empowered to resolve issues concerning its proper use.

Generally, the use of company equipment such as computers, copiers and fax machines for outside business purposes or in support of any religious, political or other outside daily activity is not permitted. Distribution of information or material not relevant to the company, its products or services, by any employee in work areas or during work hours is not allowed.

In order to protect the interests of the company and our employees, we reserve the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or company intranet. Use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate is prohibited.

Compliance

Because it is crucial to the company's success, compliance with these values is mandatory. Our Compliance Team is tasked with ensuring that all employees are aware of, understand and abide by these principles. Supervisory personnel are also tasked with ensuring that their subordinates abide by the principles set forth in this Code. The board is authorized to review compliance, and audits will be authorized as necessary. Employees are ethically obligated to report any violations or suspected violations of this Code to management's attention; and provisions for confidential reporting have been made.

We anticipate that employees are likely to have questions regarding how this Code of Ethics and Business Conduct applies in particular situations. We expect all employees with such questions to discuss the exact circumstances with designated supervisory personnel. If such personnel cannot fully and accurately answer these questions, they should consult the Compliance Team.

Whistle Blower Policy

Our Company requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the company, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that the company can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of the company's code of ethics or suspected violations of law or regulations that govern the company's operations.

No Retaliation

It is contrary to the values of the company for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of the company. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Reporting Procedure

The company has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with [insert here another title, such as Executive Director, or a board member, if the organization is very small and involving the board would be appropriate]. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the company's [Compliance Officer] [or designated employee or board member], who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the Executive Director or the organization's Compliance Officer [or other designated person].

Compliance Officer [or other title that is appropriate for your organization]

The the company's [Compliance Officer] is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the [Executive Director and/or the Board of Directors] of all complaints and their resolution and will report at least annually to the [Treasurer/Chair of the Finance Committee/Audit Committee] on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

The the companys [Compliance Officer] shall immediately notify the owner, manahers, or Audit Committee/Finance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The company's [Compliance Officer] will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Compliance Officer: * {Note: The Compliance Officer may be a board member, the Executive Director, or a third party designated by the organization to receive, investigate and respond to complaints.}

Disability Rights;

Employees can file complaints alleging a violation of:

- State or federal laws
- Regulations protecting individuals from discrimination based on disability

File a complaint if they have faced discrimination in any programs, activities or services. To file an informal complaint with the State House ADA Coordinator, you will need:

- Your name
- Your address
- A brief description of the alleged action prohibited by the laws and regulations
- The date this action allegedly occurred

Make sure to file your complaint within 30 days of the alleged discrimination. If you need help preparing or filing your complaint, please reach out to the State House ADA Coordinator. See: <https://www.mass.gov/how-to/report-disability-based-discrimination>

Discrimination and Accommodations MA

As per: <https://www.mass.gov/service-details/disability-discrimination-in-the-workplace>

Rights: An employee with a disability under law is defined as a person who has a physical or mental impairment which substantially limits one or more major life activities, has a record of such an impairment, or is regarded as having such an impairment.

We will make reasonable accommodations to allow a disabled person to work. A "reasonable accommodation" is any adjustment or modification to a job (or the way a job is done), employment practice, or work environment which makes it possible for a person with a disability to perform the essential functions of the position.

In order to be protected, a person with a disability must be qualified. If you can do the essential functions of a job with or without a reasonable accommodation, you cannot be discriminated against because of your disability. The law additionally protects people who are discriminated against based upon other people's belief that they are disabled, even if they are not disabled.

Employee Responsibilities

We may require a person who needs a reasonable accommodation to provide documentation of her/his disability and the need for the reasonable accommodation. Although an employer does not necessarily have to provide the exact accommodation requested, failure to provide a reasonable accommodation may violate the law.

Once determined that we are on notice of need for accommodation, we will initiate an interactive dialogue. This process should identify potential reasonable accommodations to overcome employee's particular limitations.

We do not have to provide an accommodation if it would cause undue hardship. We are also permitted to establish reasonable qualification standards for applicants and employees.

Staffing Plan:

As per 935 CMR 500.105(9) our staffing plan will demonstrate accessible business hours and safe employee conditions and the following personnel records;

1. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
2. A personnel record for each Marijuana Establishment Agent. Our records will be maintained for at least 12 months after termination of the individual's affiliation with our company and will include, at a minimum, the following:
 - a. All materials submitted to the commission pursuant to 935 CMR 500.030(2);
 - b. Documentation of verification of references;

- c. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
 - d. Documentation of all required training, including training regarding privacy and confidentiality requirements, Responsible Vendor Training, and the signed statement of the employee indicating the date, time, and place he or she or they received said training and the topics discussed, including the name and title of presenters;
3. We will staff our facility based on managers and owner interviews of prospective employees where withing compliance, we will ask for their experience, people skills, and past job history.

Maintaining Confidential Information;

We will Instruct all new hires to read and sign our company's NDA agreement and ensure they understand what information is confidential and needs to be protected. Included at a minimum in the NDA agreement:

- Personally identifiable information concerning an applicant, registrant, or licensee; Background check information, Criminal Offender Record Information (CORI), or Criminal History Record Information (CHRI); and Information that implicates security concerns, including our security plan.

We will Instruct all new hires to never discuss Security Plan with anyone who is not on a need-to-know basis, as this public disclosure could violate public safety.

We will Label and Limit access to hard copies of confidential Information including all background checks; and all confidential information, including but not limited to: Personnel records; SOPs; and Security Plan. Note: Our Security Plan must be shared with law enforcement authorities, including police and fire departments

We will store all organized hard copies within limited access areas in locked metal cabinets and ensure that all hard copies can be easily located and identified by subject.

We will maintain an authorized users access Log for confidential hard copies with Date and time of access and Name and employee identification number

We will provide keys or access codes or access to authorized employees only and instruct authorized employees to never give away access credentials.

Labelling and Limiting Access to Digital Copies of Confidential Information;

- We will maintain a secure password-protected cloud server for COMPANY's digital copies and Instruct authorized employees to never give out the server password.

Policy for the immediate dismissal of any agent who has diverted marijuana, engaged in unsafe practices, or been convicted or entered a guilty plea for a felony charge of distribution of a drug to a minor. 935 CMR 500.105(1)

1. This is very simple. The normalization of cannabis requires compliance with the law. If it is determined that an employee willingly diverted product, is unsafe in their practices, convicted of or enters a guilty plea for a felony drug charge distributing to a minor, they will be terminated immediately. Their badge will be destroyed, their agent status canceled on the CCC portal, and key cards will be changed to prevent entry.

Personnel Records of our Marijuana Establishment must be available for inspection by the Commission, on request. Personnel records shall be securely and confidentially maintained in either a password-protected electronic format, or in a locked, secured storage space if in physical format. These personnel records shall include:

1. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
2. A personnel record for each marijuana establishment agent. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with the marijuana establishment and shall include, at a minimum, the following:
 - a. All materials submitted to the commission pursuant to 935 CMR 500.030(2);
 - b. Documentation of verification of references;
 - c. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
 - d. Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
 - e. Documentation of periodic performance evaluations;
 - f. A record of any disciplinary action taken; and
 - g. Notice of completed responsible vendor and eight-hour related duty training.
3. A staffing plan that will demonstrate accessible business hours and safe operations conditions;
4. Personnel policies and procedures; and
5. All background check reports obtained in accordance with M.G.L c. 6 § 172, 935 CMR 500.029, 935 CMR 500.030, and 803 CMR 2.00: Criminal Offender Record Information (CORI).

SUMMARY PERSONNEL POLICIES

Company shall comply with the US Department of Labor's Fair Labor Standards Act and any other local, State, or Federal laws and regulations.

PRIORITY HIRING & PROMOTIONS: Company will grant priority hiring status to established Massachusetts residents, particularly those residing in ADIs and the host municipality, and will

be working to provide job opportunities to those demographics specifically stated by the Commission in the regulations as areas of disproportionate impact and as detailed in the Company Positive Impact Plan and the Diversity Plan. Company shall give priority application status for new hires, as well as priority status for company promotions, to applicants & employees from those listed demographics, however, these factors shall not be determinative and shall not prevent the Company from hiring the most qualified applicants and complying with all Massachusetts anti-discrimination and employment laws.

ACCOMODATIONS FOR DIFFERING ABILITIES: Company is committed to complying with or exceeding expectations in the Americans with Disabilities Act and any local, state, and federal laws prohibiting discrimination in employment against qualified individuals with differing abilities. The Company will strive to provide reasonable accommodations requested by any employee with a disability who is otherwise able to perform essential functions of their job, or to provide adequate alternative accommodations (so long as that accommodation does not result in undue hardship on the Company, or pose a threat to the health and/or safety of the employee or coworkers).

STATE REGISTRATION of MARIJUANA ESTABLISHMENT AGENTS: All employees of Company shall meet suitability requirements outlined in the State regulations, including all background checks and CORI as required by the Commission, and shall before employment start date be registered as a Marijuana Establishment Agent. All agent registrations shall be renewed annually. No employee shall be permitted to work without having a valid Agent Registration Card.

COMPANY TRAINING: All registered marijuana establishment agents under Company employ will be required to complete all necessary trainings related to job functions prior to beginning work on the floor, and training shall be tailored to the roles & responsibilities of each specific job function. At time of hire all employees will be required attend a company orientation to cover all aspects of the employee operations, individual employee expectations, details on security and compliance, and will receive on-site facility training for specific positions. Company employees will be required to receive training, which will include important Company operational information and procedures, as well as a core-curriculum of Cannabis Education seminars tailored toward creating a safe, compliant facility with the most knowledgeable staff in the MA cannabis industry. All employees will receive a minimum of 8 hours of on-going training annually to remain current with all advancements in State regulations, SOR policy, cannabis science and the evolving market, facility operations, and job site safety.

STATE CERTIFICATIONS: Employees will be required to undergo and pass any & all State-mandated certification training classes for job safety and equipment operation, and where applicable, will undergo state certifications for the safe handling of food and/or the application of fertilizers and pesticides, and will maintain annual trainings and re-certifications.

RESPONSIBLE VENDOR TRAINING: All owners, managers, and employees will be required to successfully complete such training. All new hires will be required to attend and successfully

complete the Responsible Vendor Training, in compliance with the “Certification Training Program Standards” and to include at minimum the “Certification Training Class Core Curriculum” within 90 days of start date, and all employees will be required to attend and successfully complete the Responsible Vendor Training on a yearly basis thereafter.

UNIFORMS & ID BADGES: All registered agent employees will wear clearly identifiable Company uniforms if available during all shifts, and will be required to wear a photo-ID agent badge at all times while on shift. All employees will also be required to be in possession of the State-issued Agent Registration Card at all times while on shift. Uniforms shall be kept clean and generally free from wrinkles, stains, rips or tears. When not on shift, employees should make a best-faith effort to keep all uniforms and agent badges securely stored so as to prevent theft; loss or theft of any uniform or badges shall be reported to Company management immediately, and an Incident Report will be filed with the CCC.

Uniforms or any other clothing bearing the Company logo shall not be worn in public outside of the facility or other lawful event except for the actual time it takes the employee to travel to and from their work shift and in which case the uniform must be sufficiently covered to fully conceal any Company logos.

EMPLOYEE SAFETY: All employees shall be sufficiently trained at hire in all State-mandated safety protocol and/or the operation of any equipment and machinery as is related to job functions, and will receive annual update trainings. Facility shall be designed and safety procedures implemented to prevent employee injury or unnecessary employee strain that may lead to injury. It is the responsibility of each employee to conduct all tasks in a safe and efficient manner complying with all safety and health regulations and any other specific job-related safety concerns. Employees are required to report any accident, job-related injury, or any other such incident to their supervisor immediately. Engaging in any behavior that fails to comply with company safety policies or any laws and regulations, and/or that directly or indirectly causes hazardous conditions or otherwise places persons or property at risk, shall be subject to immediate Corrective Action.

PERSONAL HYGIENE & CLEANLINESS: All Company employees will be required to maintain a sufficient level of personal hygiene and cleanliness so as not to compromise the safety and quality of the cannabis products worked with. All employees will be required to conform to certain sanitary practices while on duty including but not limited to washing hands thoroughly and sanitizing prior to starting work and at any time that hands may become contaminated. Employees will be encouraged to use best practices to limit personal contamination of cannabis products. Employees should appear presentable and ready to represent Company professionally to our guests.

PUNCTUALITY & ATTENDANCE: All Company employees will be required to arrive for their shifts on-time and as scheduled, in uniform and with all required identification, and work all shifts as scheduled. Staff schedules can be flexible and tailor-arranged with management as needed, but staff will be expected to work weekdays, weekends, and some holidays.

Eligible employees will receive benefits of Vacation Time, Medical Leave, and Personal Days. Employees will be required to coordinate in advance with scheduling Management to formally request a specific day(s) off or for vacation time. Periods of extended leave for medical or other personal reasons shall be coordinated between the employee, scheduling Management, and the Human Resources department. Sick time may be used at any time in the case of an emergency or sudden onset of illness. Any absences due to illness or injury that qualify under the Family and Medical Leave Act shall not count against the employee's attendance (medical documentation may be required).

Patterns or excessive occurrences of absenteeism or tardiness may result in Corrective Action. Failure to appear for a scheduled shift without prior arrangement or calling-in to report the absenteeism shall be considered a "No-Call No-Show" and will result in immediate Corrective Action, including possible termination. Three consecutive shifts of No-Call No-Show shall be considered job abandonment and the employee's voluntary resignation of employment.

CELL PHONES: Cell Phones will be permitted within the Company facility. All employees will be required to maintain responsibility for phones on person, stored in employee lockers or in the employee's vehicle. At absolutely no time may pictures, video, live streams, or any other such recording be taken of the interior workings of the facility where cannabis is stored, dispensed, or otherwise handled.

PROFESSIONALISM: Company expects respectful communication, cooperation, teamwork, and full participation from all employees. Every employee will have the responsibility to treat others with dignity and respect at all times, and for that level of professionalism to be exhibited during all work hours, at work functions, at industry events, and at any other time that the employee may be directly or indirectly representing the Company. Employees are prohibited from making public statements about Company, Company Policy, Management, other employees, customers, or any other licensed cannabis establishment that is derogatory or defamatory in nature. This policy applies to any employee's Social Media posts. Company is committed to cultivating a culture of diversity and inclusion in the Cannabis Industry. We will hold a Zero-Tolerance policy for behavior that is considered discriminatory or bullying based on Race, Nationality, Religion, Gender, Identity, Sexual Orientation, Age, or Differing Ability. Company will hold a Zero-Tolerance policy for behavior that is considered Sexual Harassment or Assault. Company has a Zero-Tolerance policy for any work-place Violence or threat of violence toward other employees, vendors, and/or customers. Any employee positively identified in the engagement of any such behaviors shall be subject to immediate Corrective Action, including potential termination of employment.

EMPLOYEE RELATIONSHIPS: Company employees will be required to adhere to a strict code of conduct regarding inter-personal relationships while on shift, providing for a work environment where employees maintain clear boundaries between personal and business interactions in order to effectively conduct all job functions and enhance productivity. While nothing in this policy prevents friendships or romantic relationships between co-workers, or the hiring of immediate family members, employees in managerial roles may present a Conflict of Interest if romantically involved with or immediately related to any employee under which there is a

direct-reporting relationship. No part of this policy shall preclude or interfere with the rights of employees protected by the National Labor Relations Act or any other applicable statute.

CONFLICTS OF INTEREST: Company employees shall be permitted to be gainfully employed in addition to and outside of Company so long as there is not Conflict of Interest, such as but not limited to:

- Employment with or Consultant to a Company competitor or potential competitor, supplier, or contactor;
- Serving as a Board member for another licensed Cannabis establishment;
- Owning or having controlling interest in any other licensed Cannabis establishment or in any company actively pursuing State licensing for a Cannabis establishment;
- Working for, consulting for, or serving as a Board member for any company involved with the State Responsible Vendor Program;
- Any other position or activity that may impair, or seem to impair, the employee's ability to make objective and fair decisions when performing their jobs.

No employee shall accept any gifts, discounts, services, or favors from any customer, supplier, vendor, or competitor unless such promotion was made available to all Company employees and as authorized by Management.

SOCIAL MEDIA: Employees are asked to keep their professional and personal lives as separate as possible in regards to public Social Media postings, and to exercise caution when sharing any information related to the Company. Employees may share official Company Social Media posts or links to the Company website, but are prohibited from making any social media posts that make statements implying the individual speaks on behalf of or in any other way claims to represent Company without express authorization by the Company. Employees may not post, comment, or otherwise publicly speak to any Company prices, policy, plan, protocol, or procedure. Any post made about any Company product or other job-related matters must expressly state that it is the employee's sole opinion and does not represent the views of the Company. Employees are expressly prohibited from sharing any photos, videos, live streams, or any other such recording of any part of the facility or cannabis plants or products in any stage of processing or manufacturing, storage, or distribution. Employees are expressly prohibited from sharing any photos, videos, live streams, or any other such recording where the employee or any other person is shown to be wearing the Company Uniform and/or ID badge. Employees are expected to extend their behavior outlined in the above section "Professionalism" to their social media interactions with other employees, customers, industry acquaintances, and other MA cannabis establishments or their agents.

WEAPONS BAN: No Company employee may carry on their person while at work any weapons of any kind. State law expressly prohibits any registered cannabis agent from carrying a firearm while on shift or from having a firearm on premises or in any transport vehicle. Company has a zero-tolerance policy for carrying concealed weapons and evidence of such shall result in immediate Corrective Action, which may include termination of employment.

SMOKE, DRUG, & ALCOHOL -FREE WORKPLACE: All of the Company facilities and properties will be a Smoke, Drug, and Alcohol -free workplace. No employee shall be permitted to consume any marijuana or marijuana product, alcohol, or tobacco products while on the premises, or off-site prior to or during their work shift. The use of tobacco on the premises will result in Corrective Action; Consuming cannabis or alcohol on the premises, either before, during, or after the work shift, or off shift, will result in immediate dismissal. Company reserves the right to request any employee Drug Screening for illicit substances.

CORRECTIVE ACTION: All employees are expected to understand and abide by all Company rules and policies, and to perform their job functions to the standards and expectations set forth in the job description. Company will implement the use of progressive Corrective Action to address issues of poor job performance and/or misconduct designed to provide a process to improve and prevent the recurrence of the undesired performance or conduct. The Corrective Action plan will consist of multiple steps; however, the Company may combine or skip steps based on the facts of each situation, the nature/severity of the offense, and the employee's history of corrective action:

1. Verbal Warning(s)
2. Written Warning(s)
3. Final Written Warning
4. Suspension without Pay
5. Termination of Employment

Steps for Corrective Action may be carried out by authorized Management and/or Human Resources officer as applicable.

CAUSE FOR IMMEDIATE DISMISSAL: All new hires will be instructed on Security protocol and grounds for immediate dismissal in the Company Orientation, and it will be detailed in the Employee Handbook. All employees will be required to sign documentation that they have been made aware of these conditions. Employees shall be subject to immediate dismissal in the event of:

- Consuming unsanctioned marijuana, alcohol, or other drugs on premises, either on or off shift.
- Arriving to work impaired by marijuana, alcohol, or other drugs, whether or not consumption took place off premises.
- Involvement in the Diversion of Marijuana or Marijuana Products from Company, or in the manipulation of inventory records, tracking software, or product labeling/packaging with the intent on diverting marijuana or marijuana products, which shall be reported to the Commission and to Law Enforcement.
- Engagement in unsafe practices with regard to the operation of the establishment and/or employee safety, which shall be reported to the Commission.
- Behavior that poses immediate risk to the personal safety of, or which may be considered malicious harassment, discrimination, violence, or threat toward, or any unsolicited sexual advances or assault on, any other Company employee(s) or customer(s), which shall be reported to the Commission and, in the case of a criminal act, to local Law Enforcement.

- Conviction or guilty plea in the case of felony drug offense involving distribution of controlled substances, or in the transport of any controlled substance and/or alcohol to a person under 21 years of age.
- Carrying a firearm while on shift.
- Evidence of theft of or unauthorized possession of any company property or the property of other employees/customers.
- Evidence of Theft of Hours, falsified timesheets, or alteration of any other legal document for the purposes of defrauding the Company

IMPORTANT NOTE

The transportation of cannabis products is our reason for existence. We have been licensed by the state and local authorities to transport inspected, quality cannabis products for adult use.

As a licensed marijuana establishment we are mandated to follow the state's requirements for tracking sales. Our license only permits the transportation of marijuana and marijuana products between licensed marijuana establishments. The state requires that we track and record all sales transactions including customer details. This is also an essential element of our company policy of rigorous compliance with all state and local legislation and by-laws, and a key component of our strategy to combat diversion. All customers must have their details, including their verified state retail marijuana license entered into the database prior to any sale or transfer. These details, together with a record of their purchases, will be recorded and maintained for the benefit of state inspectors.

NO person may enter our production premises without first presenting a valid, recognized, photo ID to the Duty Manager. Valid ID must be shown before entering the facility and at the Point of Sale for data-entry purposes.

There are NO EXCEPTIONS, and NO EXCUSES to this rule.

1. Restricting Access to age 21 and older

- 1.1. All employees and registered agents must be 21 years of age or older.
- 1.2. All visitors must be 21 years of age or older.
- 1.3. In accordance with 935 CMR 500.110 (1) (a) and 935 CMR 500.105 (14), **NO** person may enter our premises without first producing a valid, state or federal, photo ID.
- 1.4. Valid ID must be presented to the Duty Manager prior to entering the facility, and at the Point of Sale for data-entry purposes.
- 1.5. No person under 21 years of age may enter the premises. There are **NO** exceptions to this rule.
- 1.6. Loitering, in accordance with 935 CMR 500.110 (1) (b) is not permitted under any circumstances. Any person suspected of loitering should be politely questioned by a member of staff and, if unable to credibly account for their presence, be asked to leave the vicinity. Should the person refuse, the matter should be elevated to the Operations Manager who may, if necessary, contact local law enforcement for assistance in removing the person from the facility.
- 1.7. All cannabis waste will be rendered unusable and safely disposed of as outlined in **Cannabis Waste Disposal Procedures**, above.
- 1.8. All access to cannabis product will be strictly controlled and monitored as outlined in **Prevention of Diversion**, above.

1. Energy Compliance Plan

- a. Our vehicles will be selected using a process of seeking the smallest van in its class and selecting the vehicles in that class that has the most efficient Miles Per Gallon. Our fleet will be built out using this selection method. In an effort to affirm our commitment to evaluating alternative vehicle fuel options, we will also note the cost of hybrid and electric vehicles in this same class. As we scale up and revenue allows for a larger vehicle purchase budget, and the price of alternative fuel vehicles reduces, we will be able to align our budget with the marketplace of alternative fuel vehicles. Additional efforts are;
 - i. In accordance with 935 CMR 500.103(4), we will, at the time of license renewal, provide a report that documents our energy and drinking water usage over the preceding 12-month period.
 - ii. The use of natural light where possible, keeping windows clean to prevent over-using the heater. Our lighting system is LED-based and offers substantial energy savings.
 - iii. While not initially feasible, we hope to explore the addition of a photo-voltaic array on top of the vehicle to supplement and offset electrical demand through a renewable energy source, photons.
 - iv. We will closely follow the development, viability, and availability of energy technology and will incorporate energy-saving systems into their technical operations once their value has been demonstrated. We are committed to the adoption and application of any technology that may practically and reliably reduce our electric demand.
 - v. We will actively pursue engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal electrical provisions as through charging stations, if we acquire an electric or hybrid vehicle.
- b. We shall satisfy minimum energy efficiency and equipment standards established by the Commission and meet all applicable environmental laws, regulations, permits and other applicable approvals.
- c. We shall adopt and use additional best management practices as determined by the Commission, in consultation with the working group established under St. 2017, c. 55, § 78(b), to reduce energy and drinking water usage, engage in energy conservation (less start stop braking!) and mitigate other environmental impacts such as peeling out and revving the engine. We shall provide energy usage reporting to the Commission in a form determined by the Commission.
- d. We will adhere to the following minimum energy efficiency and equipment standards;
 - i. The building envelope for our facility, will meet minimum Massachusetts Building Code requirements and all Massachusetts amendments (790

CMR: State Building Code), International Energy Conservation Code (IECC) Section C.402 or The American Society of Heating, Refrigerating and Air-conditioning Engineers (ASHRAE) Chapters 5.4 and 5.5 as applied or incorporated by reference in 780 CMR; State Building Code.

- ii. Requirements 935 CMR 500.120(11)(b) and (c) shall not be required if we are generating 100% or more of the onsite load from an onsite clean or renewable resource.
- iii. Heating Ventilation and Air Conditioning (HVAC) and dehumidification systems will meet Massachusetts Building Code requirements and all Massachusetts amendments (780 CMR: State Building Code, IECC Section C.403 ASHRAE Chapter 67 as applied or incorporated by reference in (780 CMR: State Building Code).
- iv. The Commission may further define these standards or create reasonable exemptions or modifications, through guidelines issued in consultation with the energy and environmental standards working group established under St. 2017, c. 55 § 78(b).
- v. Requirements 935 CMR 500.120(11)(b) and (c) shall not be required if we are generating 100% or more of the onsite load from an onsite clean or renewable resource.
- vi. Heating Ventilation and Air Conditioning (HVAC) and dehumidification systems will meet Massachusetts Building Code requirements and all Massachusetts amendments (780 CMR: State Building Code, IECC Section C.403 ASHRAE Chapter 67 as applied or incorporated by reference in (780 CMR: State Building Code).
- vii. The Commission may further define these standards, or create reasonable exemptions or modifications, through guidelines issued in consultation with the energy and environmental standards working group established under St. 2017, c. 55 § 78(b)

Maintenance of Financial Records Plan

Pursuant to 935 CMR 500.000, company records will be available for inspection by the Commission, upon request. All financial records will be maintained in accordance with generally accepted accounting principles. Our company will maintain the following written records that are required and subject to inspection:

- 1.1.1. The company will maintain business financial records, which shall include manual or computerized records of:
 - 1.1.1.1. Assets and liabilities.
 - 1.1.1.2. Monetary transactions.
 - 1.1.1.3. Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers
 - 1.1.1.4. Sales records including the quantity, form, and cost of marijuana products; and
 - 1.1.1.5. Inventory records as required by 935 CMR 500.105(8) and as outlined in the General Record Keeping section of our standard operating procedures.
- 1.2. The company shall fully comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements.
- 1.3. Our point of sale systems and software are configured to separate accounting practices for marijuana products from non-marijuana products.
- 1.4. Our Marijuana Transporter establishment is not co-located with a medical dispensary and has no obligation to maintain an adequate supply of marijuana and marijuana products under 935 CMR 500.140(10) and 935 CMR 500.140(6).
 - 1.4.1. General
 - 1.4.1.1. We are prohibited from utilizing software or other methods to manipulate or alter sales data.
 - 1.4.1.2. We will conduct monthly analyses of equipment to determine that no software has been installed that could be utilized to manipulate or alter sales data.
 - 1.4.1.3. A record that this monthly analysis has been performed shall be maintained by us and made available to the Commission upon request.
 - 1.4.1.4. Should such analysis determine that software or other methods have been installed or utilized to manipulate or alter sales date, Senior management will immediately disclose this information to the Commission, and cooperate in any investigation, and take such other action directed by the Commission.

- 1.4.2. Inventory records include:
 - 1.4.2.1. Shipping manifests
 - 1.4.2.2. Delivery and unpacking video recordings
 - 1.4.2.3. Daily sales stock withdrawal and return reports
 - 1.4.2.4. Weekly inventory reports
 - 1.4.2.5. Product return reports
- 1.4.3. Salary and wages 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 a Marijuana Establishment, including members of the nonprofit corporation, if any.
- 1.4.4. All financial transactions and accounts will be entered into a proprietary accounting software by a bookkeeper specifically employed for the purpose.
- 1.4.5. The accounting software used will provide security and backup capabilities in accordance with 935 CMR 500.000 and the company security plan.
- 1.4.6. Daily sales reports will be generated by the bookkeeper and stored both digitally and as a hard copy in the records cabinet.
- 1.4.7. The accounts will be reviewed monthly by a licensed CPA.
- 1.4.8. The point-of-sale system software will automatically transfer all sales transactions to our accounting system for reconciliation by the bookkeeper.
- 1.4.9. The warehouse manager will generate a sales report from the point of sale system at the conclusion of each day. This report should be digitized and a hard copy stored in the records cabinet
- 1.4.10. Expense records
 - 1.4.10.1. warehouse managers and senior management may be provided with a company debit card and/or check-signing authorization. A receipt must be obtained and presented to the bookkeeper for all expenses paid through these means
 - 1.4.10.2. Documentation supporting business expenses such as statements and invoices, details of cash payments, receipts and the like must be securely stored in the records cabinet and presented to the bookkeeper for entry into the accounting software.
- 1.4.11. Contracts and Agreements – the company will likely enter into a number of contracts and agreements with the host municipality, service providers, financial institutions, property owners etc. Such contracts and agreements include, but are not limited to;
 - Sales and Purchase agreements
 - Loan agreements
 - Rental agreements
 - Lease agreements
 - Franchise agreements
 - Sale and lease back agreements
 - Trading agreements with suppliers

Insurance policies

Legal documentation

All such documentation must be digitized and a hard copy stored in the records cabinet.

1.4.12. Other documents may include;

Deposits with utility companies

Contracts with telecommunications companies

Business registration documents and certificates

Business licensing documents

Surety bonds

Tax records

All such documentation must be digitized and a hard copy stored in the records cabinet.

Deo Enterprices Inc.

Diversity Plan

Introduction

Our purpose is to support minorities, veterans, women, disabled individuals, and LGBTQ+ residents of the Commonwealth in order to stop the continuation of an inequitable status quo in the workplace. To do so, we intend to teach the importance of ownership, build community between diverse groups and neighboring organizations, and provide job opportunities to diverse groups, with a variety of responsibilities, that will build an efficient and robust operation all Massachusetts residents can be proud of.

To the extent permissible by law, it is the policy of this company to prioritize hiring and community engagement and support among the following demographic groups:

1. People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people
2. Women
3. Veterans
4. People with disabilities
5. People who identify as LGBTQ+

The execution of this plan will be documented and reviewed annually. The outcome of this review will be provided by our company to the Commission prior to the annual renewal of our license.

Any action taken, or programs instituted, by our company for the execution of this plan will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

This plan 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 Marijuana Establishments.

Goals

1. Employing 40% women, 20% (People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people) , 10% LGBTQ+ members, 10% veterans, and 10% those with disabilities.
2. Engage with at least 1 supplier of a company that is women, veteran, people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people, LGBTQ+, or disabled-owned businesses within the first year of operation.

3. An employee promotion goal wherein at least 50% of the employees who receive promotions within our first year of operations are of the above-listed groups.

Programs

The following programs will help effectuate the above goals:

1. Employment opportunities- when available- will be published no less frequently than annually on Indeed.com, LinkedIn, or in the Boston Globe, with the objective of reaching, women, veterans, minorities, LGBTQ+ members, and those with disabilities.
2. Management training for diverse staff will be held twice a year, open to all employees with a focus on women, veterans, people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people, LGBTQ+ members, and individuals with disabilities. Training will be led by internal managers and DEI consultants.
3. Utilize the SDO supplier list to proactively engage with women, veteran, people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people, LGBTQ+ member, and disabled-owned suppliers.

Measurement:

We intend to focus our efforts on the following metrics:

1. Have we advertised available positions on Indeed.com and/or other sources with the objective of more effectively reaching women, veterans, people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people, LGBTQ+ members, and those with disabilities?
2. Do at least 60% of our total hires include a mix of the above demographics with the percentage breakdown of goal #1 above?
3. Have any employees advanced their job roles since hiring, trained with more advanced personnel, or brought on diverse employees in their network which has increased company or management diversity with 50% of promotions being diverse employees?
4. Have we engaged with diverse suppliers, including at least 2 businesses owned by women, veterans, people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people, LGBTQ+ members, and disabled individuals, as part of our supplier diversity goal?