



Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR284262
Original Issued Date: 04/22/2022
Issued Date: 04/22/2022
Expiration Date: 04/22/2023

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: EC Developments

Phone Number: 412-651-1178
Email Address: Emily@CannaBusinessServices.com

Business Address 1: 1385 Bernardston Road
Business City: Greenfield Business State: MA Business Zip Code: 01301
Business Address 2:
Mailing Address 1: 1385 Classic Court
Mailing City: Mount Pleasant Mailing State: SC Mailing Zip Code: 29466
Mailing Address 2: Unit 330

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: no
Priority Applicant Type: Not a Priority Applicant
Economic Empowerment Applicant Certification Number:
RMD Priority Certification Number:

RMD INFORMATION

Name of RMD:
Department of Public Health RMD Registration Number:
Operational and Registration Status:
To your knowledge, is the existing RMD certificate of registration in good standing?:
If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 91 Percentage Of Control: 100
Role: Other (specify) Other Role: Managing Partner

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

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 9	Percentage Of Control:
Role: Other (specify)	Other Role: Managing Partner
First Name: Cory	Last Name: Waggoner Suffix:
Gender: Male	User Defined Gender:
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)	
Specify Race or Ethnicity:	

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

Business Interest in Other State 1

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner			
Owner First Name: Cory	Owner Last Name: Waggoner	Owner Suffix:	
Entity Legal Name: Higher Yields Consulting		Entity DBA:	
Entity Description: Provides cannabis business consulting to clients across the country			
Entity Phone: 844-449-4353	Entity Email: Info@HigherYieldsConsulting.com	Entity Website: www.HigherYieldsConsulting.com	
Entity Address 1: 2590 Walnut St. Suit #25		Entity Address 2:	
Entity City: Denver	Entity State: CO	Entity Zip Code: 80205	Entity Country: USA
Entity Mailing Address 1: 2590 Walnut St. Suit #25		Entity Mailing Address 2:	
Entity Mailing City: Denver	Entity Mailing State: CO	Entity Mailing Zip Code: 80205	Entity Mailing Country: USA

Business Interest in Other State 2

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner			
Owner First Name: Emily	Owner Last Name: Seelman	Owner Suffix:	
Entity Legal Name: Tetra Growth Systems		Entity DBA: Canna Business Services	
Entity Description: Consulting company providing support to clients seeking to engage in their state's cannabis market			
Entity Phone: 888-453-0555	Entity Email: Info@CannaBusinessServices.com	Entity Website: www.CannaBusinessServices.com	
Entity Address 1: 260 Old Lebanon Church Road		Entity Address 2:	
Entity City: Pittsburgh	Entity State: PA	Entity Zip Code: 15236	Entity Country: USA

Entity Mailing Address 1: 260 Old Lebanon Church Road

Entity Mailing Address 2:

Entity Mailing City:

Entity Mailing State: PA

Entity Mailing Zip Code:

Entity Mailing Country:

Pittsburgh

15236

USA

DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 1385 Bernardston Road

Establishment Address 2:

Establishment City: Greenfield

Establishment Zip Code: 01301

Approximate square footage of the establishment: 2000

How many abutters does this property have?: 2

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

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	HOST COMMUNITY AGREEMENT CERTIFICATION FORM.pdf	pdf	60f6e795aa87100331f66ced	07/20/2021
Community Outreach Meeting Documentation	COMMUNITY OUTREACH MEETING DOCUMENTS PT I.pdf	pdf	60f6e7a27a4b3b034a68323e	07/20/2021
Plan to Remain Compliant with Local Zoning	PLAN TO REMAIN COMPLIANT WITH LOCAL ZONING.pdf	pdf	60f6e7bddd0e402a8710ec1	07/20/2021
Community Outreach Meeting Documentation	COMMUNITY OUTREACH MEETING DOCUMENTS PT II.pdf	pdf	612e137ed64352077f3bff45	08/31/2021
Community Outreach Meeting Documentation	COMMUNITY OUTREACH MEETING DOCUMENTS PT III.pdf	pdf	612e1385e140910769754a34	08/31/2021

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

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Plan for Positive Impact.pdf	pdf	6172ca0d44662a31f288b6d4	10/22/2021

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Other (specify)

Other Role: Managing Partner

First Name: Emily

Last Name: Seelman Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Date generated: 05/02/2022

Page: 3 of 6

Individual Background Information 2

Role: Manager

Other Role:

First Name: Cory

Last Name: Waggoner Suffix:

RMD Association: Not associated with an RMD

Background Question: yes

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	EC DEVELOPMENTS CERTIFICATE OF ORGANIZATION.pdf	pdf	60f6e8798d6c3f02b7d1e12f	07/20/2021
Department of Revenue - Certificate of Good standing	Certificate of Good Standing -Dept of Revenue.pdf	pdf	60f6e88284f3fe0296c44453	07/20/2021
Secretary of Commonwealth - Certificate of Good Standing	Certificate of Good Standing Pt1-Secretary.pdf	pdf	60f6e88e308c7a02a1001583	07/20/2021
Secretary of Commonwealth - Certificate of Good Standing	Certificate of Good Standing Pt2-Secretary.pdf	pdf	60f6e8970bb484027d8c0c2a	07/20/2021
Bylaws	Ec Developments Operating Agreement .pdf	pdf	612e1446a82c5807742a6365	08/31/2021
Secretary of Commonwealth - Certificate of Good Standing	Certificate of Compliance 22203742.pdf	pdf	61390a4f38fd57079451a535	09/08/2021

No documents uploaded

Massachusetts Business Identification Number: 001455824

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	Plan for Obtaining Liability Insurance.pdf	pdf	60fe27adb27f97082de35920	07/25/2021
Proposed Timeline	EC Developments Retail Timeline.pdf	pdf	60fe27bf318844086f1f79a9	07/25/2021
Business Plan	Business Plan.pdf	pdf	612e14720f4d6c075e3d9d83	08/31/2021

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for obtaining marijuana or marijuana products	PLAN TO OBTAIN MARIJUANA.pdf	pdf	60fe2571ca9506085969a915	07/25/2021
Prevention of diversion	PREVENTION OF DIVERSION.pdf	pdf	60fe25a235907208a4671780	07/25/2021

Storage of marijuana	STORAGE OF MARIJUANA.pdf	pdf	60fe25a9004ebe08af5aa639	07/25/2021
Inventory procedures	INVENTORY PROCEDURES.pdf	pdf	60fe25edccf53908baf4872c	07/25/2021
Quality control and testing	QUALITY CONTROL AND TESTING.pdf	pdf	60fe25ffc7a0ef087bc7ed20	07/25/2021
Record Keeping procedures	RECORDKEEPING PROCEDURES.pdf	pdf	60fe26479a5de6088a18b124	07/25/2021
Maintaining of financial records	MAINTAINING OF FINANCIAL RECORDS.pdf	pdf	60fe2654314c7a086de9809f	07/25/2021
Energy Compliance Plan	ENERGY COMPLIANCE PLAN.pdf	pdf	60fe267accf53908baf48730	07/25/2021
Qualifications and training	RETAIL-QUALIFICATIONS AND TRAINING.pdf	pdf	612e2a5c42744807726e4574	08/31/2021
Personnel policies including background checks	RETAIL-PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS.pdf	pdf	612e2b4d8aea4607aa2abed3	08/31/2021
Dispensing procedures	RETAIL-DISPENSING PROCEDURES.pdf	pdf	612e2d39d905310789ae136a	08/31/2021
Restricting Access to age 21 and older	RETAIL-RESTRICTING ACCESS TO AGE 21 AND OLDER.pdf	pdf	612e2dcab9f60d076b8d38d9	08/31/2021
Transportation of marijuana	Transportation of Marijuana.pdf	pdf	612e2df825900e079f2b3825	08/31/2021
Security plan	RETAIL-SECURITY PLAN.pdf	pdf	612e36e10f4d6c075e3d9f42	08/31/2021
Diversity plan	Diversity plan.pdf	pdf	6130cafdb9f60d076b8d499a	09/02/2021

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

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

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

Monday From: 7:00 AM	Monday To: 8:00 PM
Tuesday From: 7:00 AM	Tuesday To: 8:00 PM
Wednesday From: 7:00 AM	Wednesday To: 8:00 PM
Thursday From: 7:00 AM	Thursday To: 8:00 PM
Friday From: 7:00 AM	Friday To: 8:00 PM
Saturday From: 7:00 AM	Saturday To: 8:00 PM
Sunday From: 8:00 AM	Sunday To: 5:00 PM

Host Community Agreement Certification Form

Instructions

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

Certification

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

1. Name of applicant:

EC Developments

2. Name of applicant’s authorized representative:

Emily Seelman

3. Signature of applicant’s authorized representative:

Emily Seelman

4. Name of municipality:

City of Greenfield

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

Eric Twarog, Director of the Dept. of Planning & Development



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

Eric Trump

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

eric.trump@greenfield-ma.gov

8. Host community agreement execution date:

5/19/2021



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:

[Handwritten Signature]



Greenfield Recorder (newspaper) notice

ATTACHMENT A

S

From: shunter@recorder.com
Subject: Receipt
Date: June 11, 2021 at 8:39 AM
To: seelmanee1@gmail.com

Hi Emily here is your receipt. Suzanne

Greenfield Recorder

14 Hope Street, Greenfield, MA

413-772-0261 | Fax: 413-774-5511 | Customer Service: 413-772-0148

Advertising Receipt

LEGALS CASH ACCOUNT
14 HOPE ST
GREENFIELD, MA 01301

Cust#:15585
Ad#:135067
Phone#:4137720261228
Date:06/11/2021

Salesperson: SUZANNE HUNTER Classification: Legals Ad Size: 1.0 x 3.40

Advertisement Information:

Description	Start	Stop	Ins.	Cost/Day	Total
The Recorder	06/14/2021	06/14/2021	1	106.62	106.62

Payment Information:

Date: 06/10/2021 Order# 135067 Type CreditCard

Total Amount: 106.62

Tax: 0.00

Total Payments: 106.62

Amount Due: 0.00

COMMUNITY OUTREACH MEETING JUNE 28 - Thank you for your business!

Ad Copy

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Monday, June 28, 2021 at 6:00pm EST at 1385 Bernardston Road, Greenfield, MA 01301. The proposed marijuana retailer, manufacturing, and cultivation facility establishments are anticipated to be located at 1385 Bernardston Road, Greenfield, MA 01301. We will disclose the types of facilities to be located at the proposed address, our security plan, diversion prevention, plan to positively impact the community, demonstration that our location will not constitute a nuisance as defined by law, and all other topics as required by the Massachusetts Cannabis Control Commission and requested by community members. There will be also an opportunity for the public to ask questions.

June 14

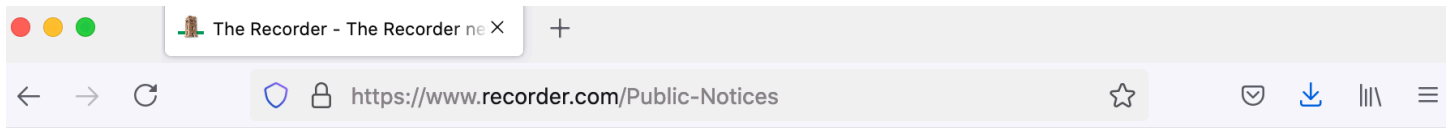
135067

Notice is hereby given that a **Community Outreach Meeting for a proposed Marijuana Establishment** is scheduled for Monday, June 28, 2021 at 6:00pm EST at 1385 Bernardston Road, Greenfield, MA 01301. The proposed marijuana retailer, manufacturing, and cultivation facility establishments are anticipated to be located at 1385 Bernardston Road, Greenfield, MA 01301. We will disclose the types of facilities to be located at the proposed address, our security plan, diversion prevention, plan to positively impact the community, demonstration that our location will not constitute a nuisance as defined by law, and all other topics as required by the Massachusetts Cannabis Control Commission and requested by community members. There will be also an opportunity for the public to ask questions.

June 14

135067

Greenfield Recorder (newspaper) notice (14 days prior to Community Outreach Meeting)



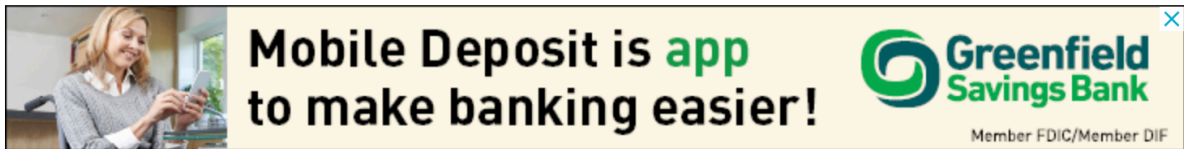
GREENFIELD RECORDER

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E-Edition

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Mobile Deposit is app to make banking easier!

Greenfield Savings Bank

Member FDIC/Member DIF

Public Notices

PUBLIC NOTICE SEARCH

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Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Monday, June 28, 2021 at 6:00pm EST at 1385 Bernardston Road, Greenfield, MA 01301. The proposed marijuana retailer, manufacturing, and cultivation facility establishments are anticipated to be located at 1385 Bernardston Road, Greenfield, MA 01301. We will disclose the types of facilities to be located at the proposed address, our security plan, diversion prevention, plan to positively impact the community, demonstration that our location will not constitute a nuisance as defined by law, and all other topics as required by the Massachusetts Cannabis Control Commission and requested by community members. There will be also an opportunity for the public to ask questions. June 14 135067

Massachusetts Public Notices.org Notice published June 14, 2021
(14 days prior to Community Outreach Meeting)

The screenshot shows a web browser window with the URL <https://www.masspublicnotices.org/Search.aspx#content-sub>. The page header includes the logo "mnp|a" and navigation links: "About Public Notices | Help", "Smart Search", and "Sign-in".

SEARCH PUBLIC NOTICES:

POPULAR SEARCHES

SEARCH:

EXCLUDE:

FILTERED BY:

COUNTY	Any	<input data-bbox="506 1171 539 1213" type="button" value="+"/>
CITY	Any	<input data-bbox="506 1245 539 1287" type="button" value="+"/>
PUBLICATION	Any	<input data-bbox="506 1318 539 1360" type="button" value="+"/>
DATE RANGE	4/27/2021 6/27/2021	<input data-bbox="506 1392 539 1434" type="button" value="+"/>

Home > Search Results > Public Notice Detail

Publication: **Recorder, The**

<input type="button" value="VIEW"/>	Recorder, The Monday, June 14, 2021
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Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Monday, June 28, 2021 at 6:00pm EST at 1385 Bernardston Road, Greenfield, MA 01301. The proposed marijuana retailer, manufacturing, and cultivation facility establishments are anticipate ... **click 'view' to open the full text.**



Geneva Bickford <geneva.bickford@greenfield-ma.gov>

Notice for Community Outreach Meeting

1 message

Emily Seelman <Emily@higheryieldsconsulting.com>

Tue, Jun 8, 2021 at 5:22 PM

To: "townclerk@greenfield-ma.gov" <townclerk@greenfield-ma.gov>

Clerk Kathryn,

Good afternoon!

My name is Emily Seelman, co-founder of EC Developments, LLC. We are applying for cannabis establishments in Greenfield. The Massachusetts Cannabis Control Commission ("Commission") requires applicants to notify the host municipality of its planned Community Outreach Meeting under 935 CMR 500.000 which establishes the regulatory requirements for adult use marijuana in the Commonwealth. Below please find EC Development's notice of the Community Outreach Meeting that will also run in the Recorder.

The Commission has requested that applicants submit their application with the Clerk's "date/time stamped" notice posted in town hall. If possible, can you provide me with an email attaching a scanned copy of a time stamped notice of the Community Outreach Meeting as follows?

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for June 25, 2021 at 6:00pmEST at 1385 Bernardston Road, Greenfield, MA 01301. The proposed marijuana retailer, manufacturing, and cultivation facility establishments are anticipated to be located at 1385 Bernardston Road, Greenfield, MA 01301. We will disclose the types of facilities to be located at the proposed address, our security plan, diversion prevention, plan to positively impact the community, demonstration that our location will not constitute a nuisance as defined by law, and all other topics as required by the Massachusetts Cannabis Control Commission and requested by community members. There will be also an opportunity for the public to ask questions.

EC Developments, LLC

June 8, 2021

Thank you so much!

GREENFIELD, MASS
2021 JUN -9 AM 8:17
CITY CLERK



HIGHERYIELDS
CANNABIS BUSINESS CONSULTANTS



EMILY SEELMAN

Senior Technical Writer

844-HI-YIELD

info@higheryieldsconsulting.com

higheryieldsconsulting.com

PLAN TO REMAIN COMPLIANT WITH LOCAL ZONING

EC Developments, LLC will remain compliant at all times with the local zoning requirements set forth in the City of Greenfield's Zoning Ordinance.

EC Developments property is in compliance with Zoning Ordinance, Chapter 200, Article VII, s. 200-7.17 and complies with the City of Greenfield Table of Uses based on location.

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

As required by the City of Greenfield's Zoning Ordinance, EC Developments will apply for a Special Use Permit and/or Site Plan Approval, as applicable, upon acquisition of a license by the State of Massachusetts. EC Developments will also apply for any other local permits required to operate at the proposed location.

EC Developments will comply with all requirements set forth in any local permit required to operate at the proposed location. The leadership team at EC Developments has already attended several meetings with various municipal officials and boards to discuss its plans to operate and has executed a Host Community Agreement with the City of Greenfield. EC Developments will continue to work cooperatively with various municipal departments, boards, and officials to ensure that it remains compliant with all local laws, regulations, rules, and codes with respect to design, construction, operation, and security.

From: Emily Seelman Emily@higheryieldsconsulting.com
Subject: Re: Notice for Community Outreach Meeting
Date: June 10, 2021 at 4:01 PM
To: Geneva Bickford geneva.bickford@greenfield-ma.gov
Cc: townclerk@greenfield-ma.gov



Good afternoon!

We had a slight hiccup with the publication timeline. So we will now be updating the meeting to June 28th rather than June 25th. This will allow for a full 14 days of publication by the local newspaper to serve as sufficient notice to community members.

Thus, the new notice we will require to be date and time stamped reads as follows:

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Monday, June 28, 2021 at 6:00pmEST at 1385 Bernardston Road, Greenfield, MA 01301. The proposed marijuana retailer, manufacturing, and cultivation facility establishments are anticipated to be located at 1385 Bernardston Road, Greenfield, MA 01301. We will disclose the types of facilities to be located at the proposed address, our security plan, diversion prevention, plan to positively impact the community, demonstration that our location will not constitute a nuisance as defined by law, and all other topics as required by the Massachusetts Cannabis Control Commission and requested by community members. There will be also an opportunity for the public to ask questions.

Thank you so much for your help!



EMILY SEELMAN

Senior Technical Writer

844-HI-YIELD
 info@higheryieldsconsulting.com
 higheryieldsconsulting.com

On Jun 9, 2021, at 8:42 AM, Geneva Bickford <geneva.bickford@greenfield-ma.gov> wrote:

Good Morning Emily,

Please see the attached.

Thanks,

Geneva

Geneva Bickford
Assistant City Clerk
14 Court Square
Greenfield, MA 01301
Email: geneva.bickford@greenfield-ma.gov
Phone: 413-772-1555
Fax: 413-772-1542

IMPORTANT UPCOMING DATES:

4/26/2021 Nomination papers will be available in the City Clerk's Office

****Tuesday, September 14, 2021: Local Preliminary Election**

Tuesday, November 2, 2021: Local Election

****A PRELIMINARY ELECTION MAY NOT BE NECESSARY**

As of Monday, March 15, 2021 Greenfield City Clerk's Office will be open from 10 a.m. to 1 p.m., Monday - Friday. All VITAL RECORDS REQUESTS REQUIRE 24 HOURS NOTICE BEFORE PICKUP.

As always you may order vital records and dog licenses online by using the following link:

<https://unipaygold.unibank.com/customerinfo.aspx> or you may send a request in writing to the City Clerk's Office, 14 Court Sq., Greenfield, MA 01301, your request must include payment along with a self addressed stamped envelope, if you are ordering a dog license you MUST provide a copy of your most recent rabies paperwork which will be returned to you.

For Marriage Intentions you must call (413-772-1555 xtn. 6162) to schedule an appointment.

For further information please visit the City Clerk's website: <https://greenfield-ma.gov/p/16/City-Clerks-Office>. You may also contact us by telephone (413-772-1555 xtn. 6162) or email (cityclerk@greenfield-ma.gov).

On Tue, Jun 8, 2021 at 5:22 PM Emily Seelman <Emily@higheryieldsconsulting.com> wrote:
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Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for June 25, 2021 at 6:00pmEST at 1385 Bernardston Road, Greenfield, MA 01301. The proposed marijuana retailer, manufacturing, and cultivation facility establishments are anticipated to be located at 1385 Bernardston Road, Greenfield, MA 01301. We will disclose the types of facilities to be located at the proposed address, our security plan, diversion prevention, plan to positively impact the community, demonstration that our location will not constitute a nuisance as defined by law, and all other topics as required by the Massachusetts Cannabis Control Commission and requested by community members. There will be also an opportunity for the public to ask questions.

EC Developments, LLC

June 8, 2021

Thank you so much!



EMILY SEELMAN

Senior Technical Writer

844-HI-YIELD

info@higheryieldsconsulting.com

higheryieldsconsulting.com

<community outreach meeting timestamp.pdf>

Time Stamped notice for updated meeting date from City Clerk



ATTACHMENT B

Geneva Bickford <geneva.bickford@greenfield-ma.gov>

Re: Notice for Community Outreach Meeting

1 message

Emily Seelman <Emily@higheryieldsconsulting.com>

Thu, Jun 10, 2021 at 4:01 PM

To: Geneva Bickford <geneva.bickford@greenfield-ma.gov>

Cc: "townclerk@greenfield-ma.gov" <townclerk@greenfield-ma.gov>

Good afternoon!

We had a slight hiccup with the publication timeline. So we will now be updating the meeting to June 28th rather than June 25th. This will allow for a full 14 days of publication by the local newspaper to serve as sufficient notice to community members.

Thus, the new notice we will require to be date and time stamped reads as follows:

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Monday, June 28, 2021 at 6:00pmEST at 1385 Bernardston Road, Greenfield, MA 01301. The proposed marijuana retailer, manufacturing, and cultivation facility establishments are anticipated to be located at 1385 Bernardston Road, Greenfield, MA 01301. We will disclose the types of facilities to be located at the proposed address, our security plan, diversion prevention, plan to positively impact the community, demonstration that our location will not constitute a nuisance as defined by law, and all other topics as required by the Massachusetts Cannabis Control Commission and requested by community members. There will be also an opportunity for the public to ask questions.

Thank you so much for your help!



EMILY SEELMAN

Senior Technical Writer

844-HI-YIELD

info@higheryieldsconsulting.com

higheryieldsconsulting.com

GREENFIELD, MASS
2021 JUN 11 AM 3:17
CITY CLERK

On Jun 9, 2021, at 8:42 AM, Geneva Bickford <geneva.bickford@greenfield-ma.gov> wrote:

Good Morning Emily,

Please see the attached.

Thanks,

Geneva

Geneva Bickford

Assistant City Clerk

14 Court Square

Greenfield, MA 01301

Email: geneva.bickford@greenfield-ma.gov

Phone: 413-772-1555

Fax: 413-772-1542

IMPORTANT UPCOMING DATES:

4/26/2021 Nomination papers will be available in the City Clerk's Office

**Tuesday, September 14, 2021: Local Preliminary Election

Tuesday, November 2, 2021: Local Election

Letters sent to abutters and neighboring property owners

Dear property owner,

My name is Emily Seelman, co-owner of EC Developments, an adult-use cannabis retailer, manufacturing, and cultivation operation, taking place in Greenfield, Massachusetts. As a potential abutter of the property, I wanted to provide you with the following notice:

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Monday, June 28, 2021 at 6:00pmEST at 1385 Bernardston Road, Greenfield, MA 01301. The proposed marijuana retailer, manufacturing, and cultivation facility establishments are anticipated to be located at 1385 Bernardston Road, Greenfield, MA 01301. We will disclose the types of facilities to be located at the proposed address, our security plan, diversion prevention, plan to positively impact the community, demonstration that our location will not constitute a nuisance as defined by law, and all other topics as required by the Massachusetts Cannabis Control Commission and requested by community members. There will also be an opportunity for the public to ask questions.

Thank you,

Emily Seelman
Co-Owner, EC Developments
Emily@HigherYieldsConsulting.com

LIST OF ABUTTERS

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Receipt showing addresses of abutters and neighboring properties


FedEx Office

Address: 3330 S 700 E
SALT LAKE CITY
UT 84106

Location: NPHKC
Device ID: -BTC01
Transaction: 940303655357

FedEx Express Saver
280317918183 0.10 lb (S) 11.55
Declared Value 100
Recipient Address:
[REDACTED]

Scheduled Delivery Date 6/16/2021

Pricing option:
ONE RATE

Package Information:
FedEx Envelope

FedEx Express Saver
280317931798 0.10 lb (S) 11.55
Declared Value 100
Recipient Address:
[REDACTED]

Scheduled Delivery Date 6/16/2021

Pricing option:
ONE RATE

Package Information:
FedEx Envelope

FedEx Express Saver
280317947764 0.10 lb (S) 11.55
Declared Value 100
Recipient Address:
[REDACTED]

Scheduled Delivery Date 6/16/2021

Pricing option:

Receipt showing addresses of abutters and neighboring properties

[REDACTED]

Scheduled Delivery Date 6/16/2021

Pricing option:
ONE RATE

Package Information:
FedEx Envelope

FedEx Express Saver
280317947764 0.10 lb (\$)
Declared Value 100 11.55
Recipient Address:
[REDACTED]

Scheduled Delivery Date 6/16/2021

Pricing option:
ONE RATE

Package Information:
FedEx Envelope

FedEx Express Saver
280317959069 0.10 lb (\$)
Declared Value 100 11.55
Recipient Address:
[REDACTED]

Scheduled Delivery Date 6/16/2021

Pricing option:
ONE RATE

Package Information:
FedEx Envelope

FedEx Express Saver
280317974312 0.10 lb (\$)
Declared Value 0 11.55
Recipient Address:
[REDACTED]

Scheduled Delivery Date 6/16/2021

Pricing option:
ONE RATE

Package Information:
FedEx Envelope

FedEx Express Saver
280317998456 0.10 lb (\$)
Declared Value 100 11.55
Recipient Address:
[REDACTED]

Receipt showing addresses of abutters and neighboring properties

Scheduled Delivery Date 6/16/2021

Pricing option:
ONE RATE

Package Information:
FedEx Envelope

FedEx Express Saver
280317974312 0.10 lb (S) 11.55
Declared Value 0
Recipient Address:
[REDACTED]

Scheduled Delivery Date 6/16/2021

Pricing option:
ONE RATE

Package Information:
FedEx Envelope

FedEx Express Saver
280317998456 0.10 lb (S) 11.55
Declared Value 100
Recipient Address:
[REDACTED]

Scheduled Delivery Date 6/16/2021

Pricing option:
ONE RATE

Package Information:
FedEx Envelope

Shipment subtotal: \$69.30

Total Due: \$69.30

(S) CreditCard: \$69.30
*****6575

M = Weight entered manually
S = Weight read from scale
Taxable item

Terms and Conditions apply. See
fedex.com/us/service-guide for details.

PLANS FOR POSITIVE IMPACT

1. Employment of Minorities, Females, Veterans, and Individuals Disproportionately Impacted by Prior Cannabis Laws

(a) Hiring and Staffing Goals

EC Developments would like to continue to support the citizens of Massachusetts by prioritizing employment of individuals who have been disproportionately impacted by prior cannabis laws¹. EC Developments shall hire 10% of its staff that are Massachusetts residents who have past cannabis convictions.

(b) Programs Designed to Support EC Development's

In order to support EC Developments' efforts to meet the above mentioned goals, EC Developments will promote the opening of positions through local job fairs and job boards. EC Developments will post on job boards such as Intercept 4: ReEntry --whose focus is to list company employment openings for individuals with prior minor cannabis possession. EC Developments will participate in, at minimum, one local job fair per year and will post hiring needs in local job boards and newspapers (such as the Greenfield Reporter), at minimum, two times per year.

(c) Milestones and Measurements

EC Development's CEO, COO, and Management will work together to ensure the ongoing success of its Plan for Positive Impact, including success rate of hitting each milestone and goal/objective. Together, these individuals will comprise the company's Community Impact Advisory Team (CIA Team). The CIA Team will document the number and placement of job opportunities posted through the OSD, job boards, newspapers, and all other media and publications. The CIA Team will track the quantity and demographics of individuals who respond to the employment advertisement, submit resumes, interview, participate in follow up interviews, undergo background checks, and are hired. The CIA Team will work with local job fair organizations to ensure yearly participation in these fairs. The CIA Team will document the number of job fairs in which the company has participated, the targeted demographics who have engaged with the company at the fair, resumes received, resulting interviews, and hiring.

These numbers will be monitored on a monthly basis to ensure that the company is successfully working towards its minimum goal of 10% staff composed of those with prior minor cannabis possession charges. Each quarter, these numbers will be reviewed by the CIA Team and analyzed for areas for improvement. These quarterly reviews will allow the CIA Team to determine if its goals and processes to reach these goals are successful or require more improvement. By

¹ Individuals disproportionately impacted by prior cannabis laws, includes those with small possession charges, but will otherwise pass background checks to ensure the safety and security of EC Developments' establishment.

example, the CIA Team will count the number of individuals hired who have past minor cannabis possession convictions. This number will be assessed from the total number of individuals hired to ensure that its minimum percentages (or greater) are met. The Progress and success of this plan will be thoroughly documented, evaluated, and reviewed annually from provisional licensure, upon license renewal and each year thereafter. The Plan will account for demonstration of proof of progress and success upon its yearly license renewal.

EC Developments will not advertise through the marketing of free promotional items, gifts, giveaways, discounts, points-based reward systems, customer loyalty programs, coupons, and “free” or “donated” cannabis, except as otherwise permitted by 935 500.105(4)(a)(9) and except for the provision of brand name take-away bags for the benefit of customers. EC Developments 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. Any actions taken, or programs instituted, by EC Developments will not violate the Commission’s regulations with respect to limitations on ownership or control or other applicable state laws.



The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$500.00

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

Certificate of Organization

(General Laws, Chapter)

Identification Number: 001455824

1. The exact name of the limited liability company is: EC DEVELOPMENTS LLC

2a. Location of its principal office:

No. and Street: 1385 BERNARDSTON ROAD
 City or Town: GREENFIELD State: MA Zip: 01301 Country: USA

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

No. and Street: 1385 BERNARDSTON ROAD
 City or Town: GREENFIELD State: MA Zip: 01301 Country: USA

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

REAL ESTATE INVESTING, AND ANY LAWFUL BUSINESS FOR WHICH A LIMITED LIABILITY COMPANY MAY BE ORGANIZED UNDER THE LAWS OF THE COMMONWEALTH OF MASSACHUSETTS."

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:

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

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

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

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

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

Title	Individual Name	Address (no PO Box)

	First, Middle, Last, Suffix	Address, City or Town, State, Zip Code
SOC SIGNATORY	CORY WAGGONER	1385 BERNARDSTON ROAD GREENFIELD, MA 01301 USA
SOC SIGNATORY	EMILY SEELMAN	1385 BERNARDSTON ROAD GREENFIELD, MA 01301 USA

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
REAL PROPERTY	CORY WAGGONER	1385 BERNARDSTON ROAD GREENFIELD, MA 01301 USA
REAL PROPERTY	EMILY SEELMAN	1385 BERNARDSTON ROAD GREENFIELD, MA 01301 USA

9. Additional matters:

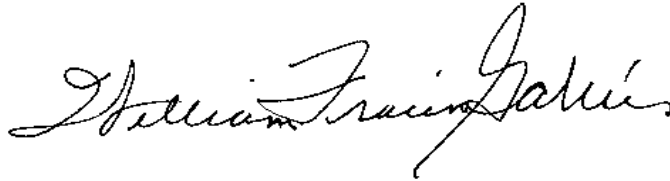
SIGNED UNDER THE PENALTIES OF PERJURY, this 26 Day of August, 2020,
EMILY E. SEELMAN

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

THE COMMONWEALTH OF MASSACHUSETTS

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

August 26, 2020 12:13 PM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth



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

mass.gov/dor

Letter ID: L0678146240
Notice Date: June 28, 2021
Case ID: 0-001-211-541



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



EC DEVELOPMENTS LLC
1385 CLASSIC CT APT 330
MOUNT PLEASANT SC 29466-7248

Why did I receive this notice?

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

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

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

What if I have questions?

If you have questions, call us at (617) 887-6400 or toll-free in Massachusetts at (800) 392-6089, 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



William Francis Galvin
Secretary of the
Commonwealth

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

June 23, 2021

TO WHOM IT MAY CONCERN:

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

EC DEVELOPMENTS LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **August 26, 2020**.

I further certify that said Limited Liability Company has not filed a certificate of cancellation; that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156C, § 70 for said Limited Liability Company's dissolution; and that, so far as appears of record, said Limited Liability Company has legal existence.



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:sam



William Francis Galvin
Secretary of the
Commonwealth

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

June 23, 2021

TO WHOM IT MAY CONCERN:

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

EC DEVELOPMENTS LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **August 26, 2020.**

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

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

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

The names of all persons authorized to act with respect to real property listed in the most recent filing are: **CORY WAGGONER, EMILY SEELMAN**

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:sam

**LIMITED LIABILITY COMPANY OPERATING AGREEMENT
FOR**

EC DEVELOPMENTS

A Limited Liability Company

THIS LIMITED LIABILITY COMPANY AGREEMENT (the Agreement) is made and entered into this 26th day of August, 2020 by the Managers listed below:

Owner 1 Emily Seelman 1385 Classic Court, Unit 330, Mount Pleasant, SC 29466	Owner 2 Cory Waggoner 3201 Brighton Blvd, Unit 387, Denver, CO 80216
Percentage Ownership 91%	Percentage Ownership 9%
Role CEO	Role Silent partner

As of this date the Managers have formed EC Developments ("Company") named above under the laws of the State of Massachusetts on August 26, 2020. Accordingly, in consideration of the conditions contained herein, they agree as follows:

ARTICLE I
Company Formation and Registered Agent

1.1 **FORMATION.** The Members hereby form a Limited Liability Company subject to the provisions of the Massachusetts Uniform Limited Liability Company Act as may be amended from time to time. Articles of Organization were filed with the Secretary of State on August 26, 2020.

1.2 NAME. The name of the Company shall be: EC Developments, LLC

1.3 REGISTERED OFFICE AND AGENT. The location of the registered office of the Company shall be:

REGISTERED AGENTS INC.
82 WENDELL AVE
STE 100
PITTSFIELD, MA 01201

1.4 TERM. The Company shall continue in perpetuity, except for the dissolution as permitted by 1.4(a)-(d) listed herein.

(a) Managers whose capital interest as defined in Article 2.2 exceeds 50 percent vote for dissolution; or (b) Any event which makes it unlawful for the business of the Company to be carried on by the Managers; or

(b) The majority vote of the original managing members as listed above.

(c) Any other event causing a dissolution of a Limited Liability Company under the laws of the State of Massachusetts.

1.5 CONTINUANCE OF COMPANY. Notwithstanding the provisions of ARTICLE 1.4, in the event of an occurrence described in ARTICLE 1.4(c), if there are at least two remaining Managers, said remaining Managers shall have the right to continue the business of the Company. Such right can be exercised only by the majority vote of the remaining Managers within ninety (90) days after the occurrence of an event described in ARTICLE 1.4(c). If not so exercised, the right of the Managers to continue the business of the Company shall expire.

1.6 BUSINESS PURPOSE. The purpose of the Company is to engage in any lawful act or activity for which a Limited Liability Company may be formed under the Limited Liability statutes of the State of Massachusetts.

1.7 PRINCIPAL PLACE OF BUSINESS. The location of the principal place of business of the Company shall be:

1385 Bernardston Road, Greenfield, MA 01301

1.8 THE MANAGERS. The name and place of residence of each member are contained in Exhibit 2 attached to this Agreement.

1.9 ADMISSION OF ADDITIONAL MANAGERS. Except as otherwise expressly provided in the Agreement, no additional Managers may be admitted to the Company through issuance by the company of a new interest in the Company without the prior majority vote of the Managers.

ARTICLE 2

Capital Contributions

2.1 INITIAL CONTRIBUTIONS. The Managers initially shall contribute to the Company capital as described in Exhibit 3 attached to this Agreement. The agreed value of such property and cash is \$200,000.

2.2 ADDITIONAL CONTRIBUTIONS. Except as provided in ARTICLE 6.2, the Managers shall equally split the cost of additional contribution to the Company's capital.

ARTICLE 3

Profits, Losses and Distributions

3.1 PROFITS/LOSSES. For financial accounting and tax purposes the Company's net profits or net losses shall be determined on an annual basis and shall be allocated to the Managers in proportion to each Manager's relative capital interest in the Company as set forth in Exhibit 2 as amended from time to time in accordance with Treasury Regulation 1.704-1.

3.2 DISTRIBUTIONS. The Managers shall review, determine, and distribute available free cash flow quarterly. Free cash flow as referred to herein, shall mean the net cash of the Company available after appropriate provision for expenses and liabilities, as determined by the Managers.

ARTICLE 4

Management

4.1 MANAGEMENT OF THE BUSINESS. The name and place of residence of each Manager is attached as Exhibit 1 of this Agreement. By a vote of the Managers holding a majority of the capital interests in the Company, as set forth in Exhibit 2 as amended from time to time, shall elect so many Managers as the Members determine, but no fewer than one.

4.2 MEMBERS. The liability of the Members shall be limited as provided under the laws of the Massachusetts Limited Liability statutes. Members that are not Managers shall take no part whatever in the control, management, direction, or operation of the Company's affairs and shall have no power to bind the Company. The Managers may from time to time seek advice from the Members, but they need not accept such advice, and at all times the Managers shall have the exclusive right to control and manage the Company. No Member shall be an agent of any other Member of the Company solely by reason of being a Member.

4.3 POWERS OF MANAGERS. The Managers are authorized on the Company's behalf to make the following decisions only upon majority vote in agreement by the Managing Members, including: (a) the sale, development lease or other disposition of the Company's assets; (b) the purchase or other acquisition of other assets of all kinds; (c) the management of all or any part of the Company's assets; (d) the borrowing of money and the granting of security interests in the Company's assets; (e) the pre-payment, refinancing or extension of any loan affecting the Company's assets; (f) the compromise or release of any of the Company's claims or debts; and, (g) the employment of persons, firms or corporations for the operation and management of the company's business. In the exercise of their management powers, the Managers are authorized to execute and deliver the following, only upon majority vote in agreement by the Managing Members: (a) all contracts, conveyances, assignments leases, sub-leases, franchise agreements, licensing agreements, management contracts and maintenance contracts covering or affecting the Company's assets; (b) all checks, drafts and other orders for the payment of the Company's funds; (c) all promissory notes, loans, security agreements and other similar documents; and, (d) all other instruments of any other kind relating to the Company's affairs, whether like or unlike the foregoing.

The voting power of the Managing Members are outlined a follows:

SHAREHOLDER NAME	POSITION	VOTE
Emily Seelman	CEO	91
Cory Waggoner	General Manager	9

4.4 COMPANY POSITIONS. Managers shall have the responsibility for managing the operations of the Company and for effectuating decisions on behalf of the Company.

4.5 NOMINEE. Title to the Company's assets shall be held in the Company's name or in the name of any nominee that the Managers may designate. The Managers shall have power to enter into a nominee agreement with any such person, and such agreement may contain provisions indemnifying the nominee, except for his willful misconduct.

4.6 COMPANY INFORMATION. Upon request, the Managers shall supply to any member information regarding the Company or its activities. Each Member or his

authorized representative shall have access to and may inspect and copy all books, records and materials in the Manager's possession regarding the Company or its activities. The exercise of the rights contained in this ARTICLE 4.6 shall be at the requesting Member's expense.

4.7 EXCULPATION. Any act or omission of the Managers, the effect of which may cause or result in loss or damage to the Company or the Members if done in good faith to promote the best interests of the Company, shall not subject the Managers to any liability to the Members.

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

4.9 RECORDS. The Managers shall cause the Company to keep at its principal place of business the following:

- (a) a current list in alphabetical order of the full name and the last known street address of each Member;
- (b) a copy of the Articles of Organization, EIN, and the Company Operating Agreement and all amendments;
- (c) copies of the Company's federal, state and local income tax returns and reports, if any, for the three most recent years;
- (d) copies of any financial statements of the limited liability company for the three most recent years.

ARTICLE 5

Compensation

5.1 MANAGEMENT FEE. Any Manager or Member rendering services to the Company shall be entitled to compensation commensurate with the value of such services.

5.2 REIMBURSEMENT. The Company shall reimburse the Managers or Members for all direct out-of-pocket expenses incurred by them in managing the Company.

ARTICLE 6

Bookkeeping

6.1 BOOKS. The Managers shall maintain complete and accurate books of account of the Company's affairs at the Company's principal place of business. Such books shall be kept on such method of accounting as the Managers shall select. The company's accounting period shall be the calendar year.

6.2 MEMBER'S ACCOUNTS. The Managers shall maintain separate capital and distribution accounts for each member. Each member's capital account shall be determined and maintained by the Company and shall consist of his initial capital contribution increased by:

- (a) any additional capital contribution made by him/her; and/or
- (b) credit balances transferred from his/her distribution account to his/her capital account.

6.3 REPORTS. The Managers shall close the books of account after the close of each calendar year, and shall prepare and send to each member a statement of such Member's distributive share of income and expense for income tax reporting purposes.

ARTICLE 7

Transfers

7.1 ASSIGNMENT. If at any time a Member proposes to sell, assign or otherwise dispose of all or any part of his interest in the Company, such Member shall first make a written offer to sell such interest to the other Members at a price determined by mutual agreement. If such other Members decline or fail to elect such interest within forty-five (45) days, and if the sale or assignment is made and the Members fail to approve this sale or assignment by majority vote then, pursuant to the Massachusetts Uniform Limited Liability statutes, the purchaser or assignee shall have no right to participate in the management of the business and affairs of the Company. The purchaser or assignee shall only be entitled to receive the share of the profits or other compensation by way of income and the return of contributions to which that Member would otherwise be entitled.

ARTICLE 8

Separation Scenarios

8.1 Death of a Member. The death of any member shall not cause the dissolution of the Company. The Member's shares will be purchased by the remaining Members, the value of which is paid to the Member's heirs and assigns. The Managing Member Spouse shall have the first right of refusal to purchase the shares of the deceased Member.

8.2 Criminal Misconduct. Should a Member commit criminal misconduct that amounts to a felony and/or undue harm to the ability of the Company to operate, the Member will be subject to immediate expulsion. The remaining Members will purchase the expelled Member's shares at the value of the shares at the time of expulsion.

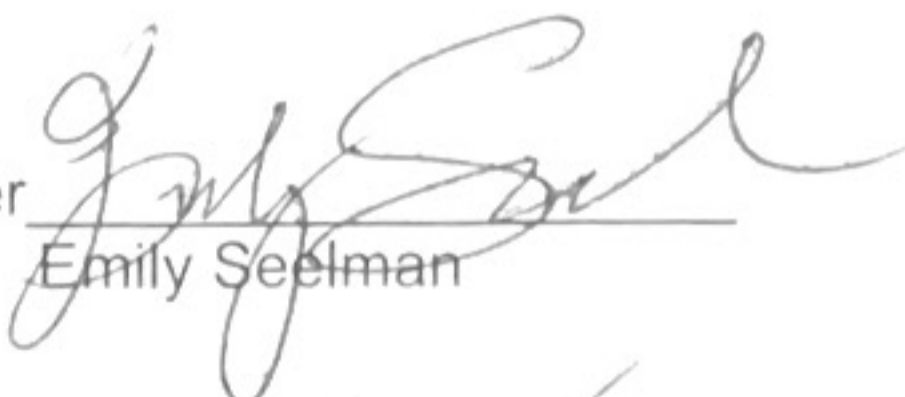
If a Member commits criminal misconduct against the Company, the Member will be subject to immediate expulsion and forfeiture of shares without payment of value of the shares.

8.3 Divorce. Should Managing Member Spouses divorce amicably, the Company continues normal operations. If hostile, both Members separate from the Company upon legal separation and, on the day of finalization of divorce, will be paid the value of shares valued at the time of legal separation.

8.4 Non-participation. If a Member does not perform through agreed upon roles for a period of 3 months (one quarter), the Company is permitted to buy out the member according to the valuation of the business at the beginning of that quarter. Managing Members will first be required to notify the non-participating member, in writing, of the Member's lack of participation with evidentiary proof. The non-participating member will be permitted to provide written evidence as to the performance of his/herself. The remaining Members will be permitted to evaluate the evidence from both Members to determine whether the Member has not been participating.

8.5 Resignation. Any Member may resign at any time upon written notice to the Company. Upon such resignation, the Member may be paid the value of shares at the time of notice of resignation.

Signed and Agreed this 26th day of August 2020.

Member 
Emily Seelman

Member 
Cory Waggoner

**LIMITED LIABILITY COMPANY OPERATING AGREEMENT
FOR EC DEVELOPMENTS, LLC**

LISTING OF MANAGERS

The following Managers were elected to operate the Company pursuant to ARTICLE 4 of the Agreement:


Printed Name: Emily Seelman / CEO

1385 Classic Court, Mount Pleasant, SC 29466
Address:


Printed Name: Cory Waggoner / SILENT PARTNER

3201 Brighton Blvd, Unit 387, Denver, 80216
Address:

The above listed Manager(s) will serve in their capacities until they are removed for any reason by a majority vote of the Members as defined by ARTICLE 4 or upon their voluntary resignation.

Signed and Agreed this 26th day of August, 2020.


Member


Member

**LIMITED LIABILITY COMPANY OPERATING AGREEMENT
FOR EC DEVELOPMENTS, LLC**

LISTING OF MEMBERS

As of the 26th day of August, 2020, the following is a list of Members of the Company:

NAME:

ADDRESS:

EMILY SEELMAN

1385 Classic Court, Unit 330, Mount Pleasant, SC
29466

CORY WAGGONER

3201 Brighton Blvd, Unit 387, Denver, 80216

**LIMITED LIABILITY COMPANY OPERATING AGREEMENT
FOR EC DEVELOPMENTS, LLC**

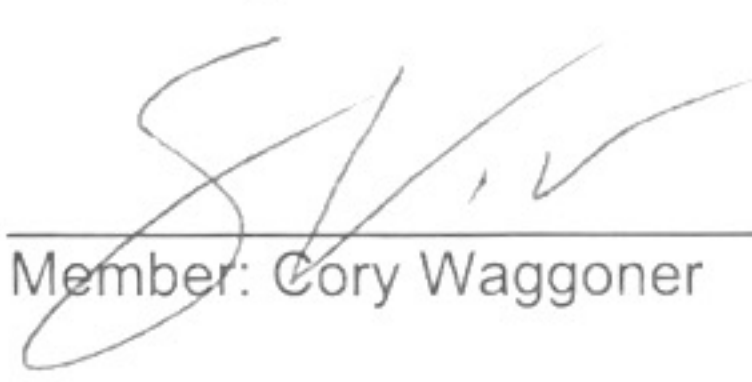
CAPITAL CONTRIBUTIONS

Pursuant to ARTICLE 2, the Members' initial contribution to the Company capital is stated to be 200,000. The description and each individual portion of this initial contribution is as follows:

SHAREHOLDER NAME	POSITION	CONTRIBUTION AMOUNT	
Emily Seelman	CEO	\$190,000	Start-up launch and operational process, application preparation work, site assessment, contract negotiations, operational oversight, property lease payments (land and buildings)
Cory Waggoner	Silent Partner	\$10,000	40 hours of consulting services

SIGNED AND AGREED this 26th day of August, 2021.



Member: Emily Seelman

Member: Cory Waggoner

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THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF LABOR AND WORKFORCE DEVELOPMENT
DEPARTMENT OF UNEMPLOYMENT ASSISTANCE

Charles D. Baker
GOVERNOR

Karyn E. Polito
LT. GOVERNOR



369048207

Rosalin Acosta
SECRETARY

Richard A. Jeffers
DIRECTOR

EC DEVELOPMENTS
1385 BERNARDSTON RD
GREENFIELD, MA 01301-1151

EAN: 22203742
September 08, 2021

FEIN :87-0898962

The Department of Unemployment Assistance certifies that as of 9/17/2021, EC Developments is current in all its obligations relating to contributions, payments in lieu of contributions, and the employer medical assistance contribution established in G.L.c.149,§189. This certificate expires in 30 days from the date of issuance.

Richard A. Jeffers, Director
Department of Unemployment Assistance

PLAN FOR OBTAINING LIABILITY INSURANCE

Immediately upon licensure, EC Developments will utilize the National Cannabis Risk Management Association (NCRMA), a leading firm providing cannabis business members innovative risk management training and insurance coverage. The NCRMA's extensive education and robust risk management practices have been designed to lower claim rates for its members. Its Appointed Broker program is the only dedicated, cannabis-vetted and appointed broker program in the country. Not only does the NCRMA provide insurance coverage for cannabis businesses, but it also provides its members with benefits that reduce the risk of costly errors and missteps.



EC Developments will maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate annually and product liability coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate annually. The deductible for each policy will be no higher than \$5,000 per occurrence. *See* 935 CMR 500.105(10)(a). EC Developments will ensure its ongoing compliance with 935 CMR 500.105(10). Although EC Developments is confident in its ability to maintain insurance coverage, should coverage be unavailable, EC Developments will hold \$250,000 minimum in escrow for liability coverage. Should a withdrawal from escrow be required, it will be replenished within 10 business days.

The NCRMA endorses coverage for businesses like EC Developments that includes,

1. Non-admitted coverage provided through an “A 11” (excellent”) rated carrier by A.M. Best;

2. Comprehensive coverage including:
 - a. Premises liability coverage
 - b. Products/completed operations liability coverage
 - c. Commercial property coverage
 - i. Premises liability
 - ii. Business personal property
 - iii. Business income
 - iv. Equipment breakdown
3. Exclusive premium credit available only to NCRMA members
4. Specialty risk control services tailored to the cannabis industry
5. 48-hour or less service response

General liability coverage highlights

ISO based Occurrence or Claims-Made coverage forms

Special Events Coverage Available

Products Coverage Highlights

ISO Based Claims-Made Coverage form

Zero deductible available

Property Coverage Highlights

ISO Based Form

EC Developments will consider expanded coverage as available and based upon need. These property enhancement endorsement available, including:

- Personal effect and property of others
- Valuable papers and records
- Outdoor signs
- Crime
 - Accounts receivable
 - Employee dishonesty
 - Money and securities (inside and outside premises)
- Equipment breakdown up to property limit
- Inland marine
- Excess policy amounts

EC Developments
Business Plan

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I. EXECUTIVE SUMMARY

EC Developments, LLC is a cannabis operation seeking to develop legally compliant, high quality cannabis to the State of Massachusetts, starting in the Impact Area of Greenfield. We are focused on the local hiring of individuals seeking to engage in the cannabis industry through meaningful employment, the utilization of local organizations for our ancillary needs and buildout support, and the donation of time and financial resources to local organizations in need.

II. BUSINESS DESCRIPTION

EC Developments is a Massachusetts limited liability company applying for cultivation, manufacturing, and retail licenses in the State. EC Developments is in the unique position to develop leading and proficient cannabis operations in Massachusetts through its exclusive relationship with two global cannabis consulting firms: Higher Yields Consulting (HYC), founded in Denver, Colorado and Canna Business Services, founded in Pittsburgh, Pennsylvania. Colorado has been the launching point of the cannabis revolution taking place in the USA today. Pennsylvania marked the expansion of a more stringent, regulatory framework that has expanded throughout the Eastern seaboard and Midwest. Merging the battle-tested expertise of these companies, EC Development is poised to develop some of the top producing cannabis operations in the country, starting in Greenfield, Massachusetts.

A. Biography and Background

EMILY SEELMAN

FOUNDER & CEO OF CANNA BUSINESS SERVICES

Co-founder & CEO, Networking4Moms nonprofit

Board Member, National Cannabis Risk Management Association



Emily brings with her experience in the start-up industry as well as a legal background. Ms. Seelman attended Grove City College, a highly ranked, nationally recognized Christian private liberal arts and sciences college, known for its rigorous academics. Here, she received her Bachelor of Science degree in Business Marketing, graduating with high honors in Marketing Management and Dean's List with Distinction.

After college, Ms. Seelman attended Duquesne University School of Law and graduated Cum Laude with an award for the highest grade in Expert Evidence. During her time in law school, Ms. Seelman was an Associate Editor for the Duquesne Law Review Journal and received the Distinguished Junior Staff Editor Award. She served as the law school representative for the Pennsylvania Bar Association and Allegheny County Bar Association-Women in Law Division, Vice President of the Christian Legal Society and worked as a student-representative for the Barbri Bar Preparation Company. She was a three-year Merit Scholarship recipient for high levels of achievement.

Ms. Seelman practiced as an Associate Attorney in the Civil Litigation and Employment law sections of the 13th largest law firm in the City of Pittsburgh, working mainly in medical malpractice, contract disputes, employee sexual harassment claims, and commercial property acquisition. Ushering in the cannabis movement in Pennsylvania, Ms. Seelman helped build the firm's legal cannabis team and worked with clients preparing applications for Pennsylvania cannabis establishment licenses.

Seeing a great need in the industry for services that provided the work product of an attorney, without price gouging clients, she founded Canna Business Services (formerly, Tetra Growth Systems).

Since 2016, Ms. Seelman has been working with clients in preparing their applications for cannabis licenses. As a result of her expertise in the industry, Ms. Seelman has been a guest on numerous interviews, podcasts, FM radio shows, magazines, and speaking stages.

Through her company, Ms. Seelman oversees a team of writers with significant experience in cannabis application preparation as well as expertise in law, government contract writing, procurement for the federal government, FDA regulations, education, journalism, and cannabis business operational buildout. Part of her practice is to anticipate legislative and regulatory changes in local, state, and federal laws regarding cannabis and ancillary items affecting the cannabis industry, such as banking, zoning, and compliance standards.

Non-profit work:

- Networking4Moms
 - Co-founder and CEO of Networking4Moms, a nonprofit built to bridge the gap between stay-at-home moms seeking to re-enter the workforce and companies

who see the value in the skills acquired by women who have stayed home to raise kids.

- Steel City Hero Hunts
 - Advisory Board member. An organization dedicated to providing fully funded trips for Pittsburgh-area veterans.
- SERT Ministries
 - An all-volunteer nonprofit dedicated to the rescue of trafficked children both domestic and abroad.
- SoapToHope
 - Ongoing contributor. Nonprofit that provides resources to addicts and the homeless of Utah.
- Big Brothers Big Sisters
 - 4 years as a “big sister” to a student of the Big Brothers Big Sisters Program, providing support and resources as her “little sister” navigated the challenges of high school.
- Project Angel Tree
 - While in law school, Ms. Seelman spent 3 years working with Project Angel Tree to provide Christmas gifts to children whose parents or guardians were incarcerated.

Pertinent Links:

- Canna Business Services: www.cannabusinessservices.com
- Awaken Atlanta FM Radio Show, UI Media Network, “*Weed Saved My Life?*”:
<https://uimedianetwork.org> <https://www.facebook.com/AwakenAtlantaUIMedia/>
- Cannabis Law Talk Podcast: <https://www.leechtishman.com/podcast-series/cannabis-lawtalk/>
- Tetra Growth Systems, Winner of ICON Innovation Award, Unstoppable Growth Conference: www.UnstoppableGC.com
- Cannabis Consulting: Cannabis Commercialization, Post-Covid Compliance and Licensing Essentials for Sustained Growth:
<https://jrburgess.securechkout.com/tetra-webinar?fbclid=IwAR2ir7Pfx2-2Uwb7MCVJGqSteHF2W39uO1kywmp2LciGyqJy0MXzsFqk274>
- Speaker at Empowering Health Through Medical Cannabis Event:
<https://www.facebook.com/events/735824723436029/>

- Interview with 420 Beginner Magazine:
<https://420beginner.com/grow-your-marijuana-business/>

EC Developments looks forward to engaging with local residents of Greenfield, Massachusetts to build out its organization. As is provided below, Greenfield is an Impact Area suffering from expansive unemployment. These individuals have skills that can be trained and well-utilized at EC Developments. Ms. Seelman looks forward to providing these opportunities to the City and changing the landscape of its economy.

B. External Support: Global Consulting and CPA Firms

CORY WAGGONER, FOUNDER & CEO OF HYC

EC Developments has provided 9% equity to Cory Waggoner, for his support in the buildout and development of the property acquired by EC Developments. Although Cory Waggoner will have no direct or indirect authority or control over the company, Mr. Waggoner was provided a small portion of equity for the sweat equity provided to EC Developments through his services.

Mr. Waggoner began his career as an owner and operator of medical marijuana dispensaries when Colorado's medical marijuana program was in its infancy, with patient roles in the mere thousands and very few grows and stores in operation statewide. From 2010-2012 he oversaw Options Wellness Centers' evolution into one of the largest, most efficient medical marijuana cultivation operations in the state as Colorado's patient roles topped 100,000, expanding two cultivation facilities from 2,800 square feet to more than 32,000 square feet total space in just 15 months. Waggoner founded C&C Consulting in 2011 to share his passion for cultivation optimization with Colorado's growing number of medical marijuana dispensaries, improving operations for Lincoln Herbal and Good Humor, both vertically integrated medical marijuana dispensaries in Denver and Boulder. Cory oversaw the sale of both dispensaries and cultivation facilities to new investors and assumed responsibility for Lincoln's daily operations after its transition to new ownership.

In 2015 Waggoner founded HYC – shortly after recreational marijuana was first legalized in Colorado – in response to investors' and business owners' growing need for expertise beyond cultivation design and optimization. With his four-step "Higher Enlightenment" process, Waggoner and HYC provide "seed-to-scale" guidance for the start-up and operation of cannabusinesses in the U.S. and internationally, helping entrepreneurs navigate the complexities of real estate development, permitting, financing, mergers, and hemp and cannabis product sales/distribution. Through HYC, Waggoner has overseen the design or optimization of nearly 2 million square feet of cannabis cultivation and extraction facilities worldwide. Projects include an initial assessment and report to optimize Copperstate Farms, the largest indoor cannabis cultivation facility in the United States; design of THC crude refining operations in the European Union; development of 100 hectare CBD/THC hemp farm in Argentina; and design of a

multi-phased facility in Portugal that, when fully realized, would be one of the largest cannabis cultivation and manufacturing facilities in the world.

Waggoner's team has guided the development and completion of more than 100 successful cannabis licensing and permitting applications, including merit-based licensing applications in 13 U.S. states. HYC currently serves as third party auditors for The Safe Harbor Program (Safe Harbor), the nation's first and only service-based program that specializes in connecting cannabis-related businesses with financial institutions. Safe Harbor provides due diligence, monitoring, and assistance with financial reporting to enable cannabusinesses to have banking relationships that follow FinCEN guidelines, and HYC ensures Safe Harbor's services are delivered in full compliance with Know Your Customer (KYC) guidelines, the Bank Secrecy Act (BSA), and all other applicable regulations.

HYC have been third party auditors to Safe Harbor since 2017, beginning with projects in Colorado from and expanding to audit Safe Harbor operations across the United States. Waggoner's team combines for more than 50 years of experience implementing and auditing Marijuana Enforcement Tracking Reporting Compliance (METRC) and BioTrack, inventory and point-of-sale systems that ensures cannabusiness owners operate lawfully and meet each state's myriad of reporting requirements.

Waggoner continues to place strong emphasis on customer service and client retention at HYC, just as he has since founding his first start up – after graduating from the University of Alabama at Birmingham in 2008. He is also committed to educating and mentoring fellow entrepreneurs to help them succeed in the cannabis space. Through HYC, Waggoner curates and hosts tours of cannabis cultivation and manufacturing facilities in Denver for aspiring business owners, and he is a frequent speaker at industry events, including Elevator Nights Los Angeles, "Smoke and Grow Rich Tour," New West Summit, NCIA, ACAMS California, Berkeley University HAAS MBA Program and other events around the country.

Certifications:

- *Key Badge Holder Marijuana Enforcement Division Issued Aug 2011*
- *Compliance Management Training MRM Compliance Issued Sept 2015*

**BRIDGE WEST, CANNABIS-SPECIALIZING CERTIFIED PERSONAL
ACCOUNTING FIRM**

EC Developments has engaged with the globally recognized, cannabis-specializing Certified Personal Accounting (CPA) firm, Bridge West. Bridge West is one of the first accounting firms in the world to focus solely on the cannabis and hemp industries. It is a full-service firm for accounting, audit, tax, and advisory services. Since 2009, the firm has guided over 400 domestic and international cannabis businesses through rigorous business and regulatory environments.

From inventory management, ensuring tax compliance, and preparing audited financial statements, the firm services many of the challenging issues EC Developments will face as it prepares and builds its operations.

The firm's CEO is a nationally recognized speaker in cannabis tax, accounting, and banking issues, and has been featured on *Fox Business News*, *CNBC*, and numerous other print and radio media outlets. Its Chief Compliance Officer provides consulting services in the areas of inventory costing for tax and accounting, entity structure, and other complex areas. The firm has a four-pronged approach to helping EC Developments navigate the cannabis industry and remain compliant: accounting systems, tax assistance, financial statements auditing, and point-of-sale strategies. Due to its thorough understanding of the banking regulations surrounding the cannabis industry, this firm will ensure that Applicant remains legally compliant with all state regulations, Federal Guidelines (Cole Memo, FinCEN Guidelines and Controlled Substance Act), and inventory management protocol.

C. Selected Location

EC Developments has engaged in an agreement with the property owner of 1385 Bernardston Road in Greenfield, Massachusetts, contingent upon acquisition of its cannabis business licensure from the State. As provided in greater detail below, the City of Greenfield is located in an Impact area due to the financial position of the City. Prior to our proposed use on the property, the property has been used as a sports facility. The sports facility, like many businesses, has suffered severe financial hardship due to the Covid-19 pandemic. The owner is a proponent of adult-use cannabis and supports EC Developments' proposed use of the property. The property encompasses approximately 14 acres of land and has buildings that are easily convertible into cannabis facilities.

Greenfield Statistics

- Population: 17,258/70,180 (Greenfield/Franklin County)
- Unemployment rate: 25.7% / 26.4% (Greenfield/Franklin County) (2020)
- Over 250 feet away from schools
 - Greenfield High School: 3.6 miles
 - Greenfield Middle School: 4.1 miles
- Only 0.6 miles away from Bernardston Police Department
- Located in a Green Zone
- Host Community Agreement, 1% of payments pledged to local nonprofit organizations

As of July, 2020, Greenfield has 4 retailer licenses available for acquisition by interested parties (limited to a total of 8 retailer licenses). EC Developments has obtained its Host Community Agreements with the City and has engaged in a Community Outreach Meeting. All cannabis establishments are required to obtain a special permit from the Zoning Board of Appeals. In compliance with local rules, EC Developments hours of operation will occur never between

10:00PM and 7:00AM and will not be located within a radius of 250 feet of pre-existing public or private school providing education in kindergarten or grades 1 through 12, measured in a straight line from the nearest point of the property line in question to the nearest point of the property line of the cannabis establishment.

III. MARKET RESEARCH

A. Cannabis Industry Overview¹

Efforts to combat the long-standing demonization of cannabis in the U.S. have hinged on redefining cannabis as medicine and focusing on the economic and social costs of treating users as criminals. Groups such as the Drug Policy Alliance, the Marijuana Policy Project, the National Organization for the Reform of Marijuana Laws (NORML), and the Coalition for Rescheduling Cannabis have been instrumental in bringing change. Despite the CSA listing cannabis as a Schedule 1 drug with high potential for abuse with no medical use under federal law, California legalized medical cannabis via Proposition 215 in 1996. In 1998 Alaska, Washington, Oregon, and Arizona passed medical cannabis laws and patient protections. Efforts to “re- criminalize” cannabis in Oregon failed with 68 percent of Oregonians supporting their “de-crim” laws. By 2011, Maine, Nevada, Colorado, Hawaii, Montana, Vermont, Rhode Island, New Mexico, Massachusetts, Washington, D.C. (D.C.), New Jersey, Delaware, and Connecticut had passed either medical cannabis or decriminalization legislation.

The modern approach towards cannabis in the U.S. brings with it much hope and potential for effective change. A record 66 percent of Americans now support legalizing cannabis, a dramatic increase from just 12 percent in 1969. There were more than 9,000 active licenses for cannabis businesses in the U.S. in 2017, with the industry employing more than 120,000 people. As more states move to legalize cannabis, these numbers will only continue to rise, potentially providing a new stream of revenue and jobs to local economies. Currently, sales of medical cannabis are strong in states that allow for the legal sale of the product. The demand for medical marijuana is expected to remain strong throughout various economic cycles as people rely on it just as they do other medications. As a result, medical marijuana dispensaries and cultivation businesses clinics operate with strong economic stability. Today, more than 300 million Americans live under state

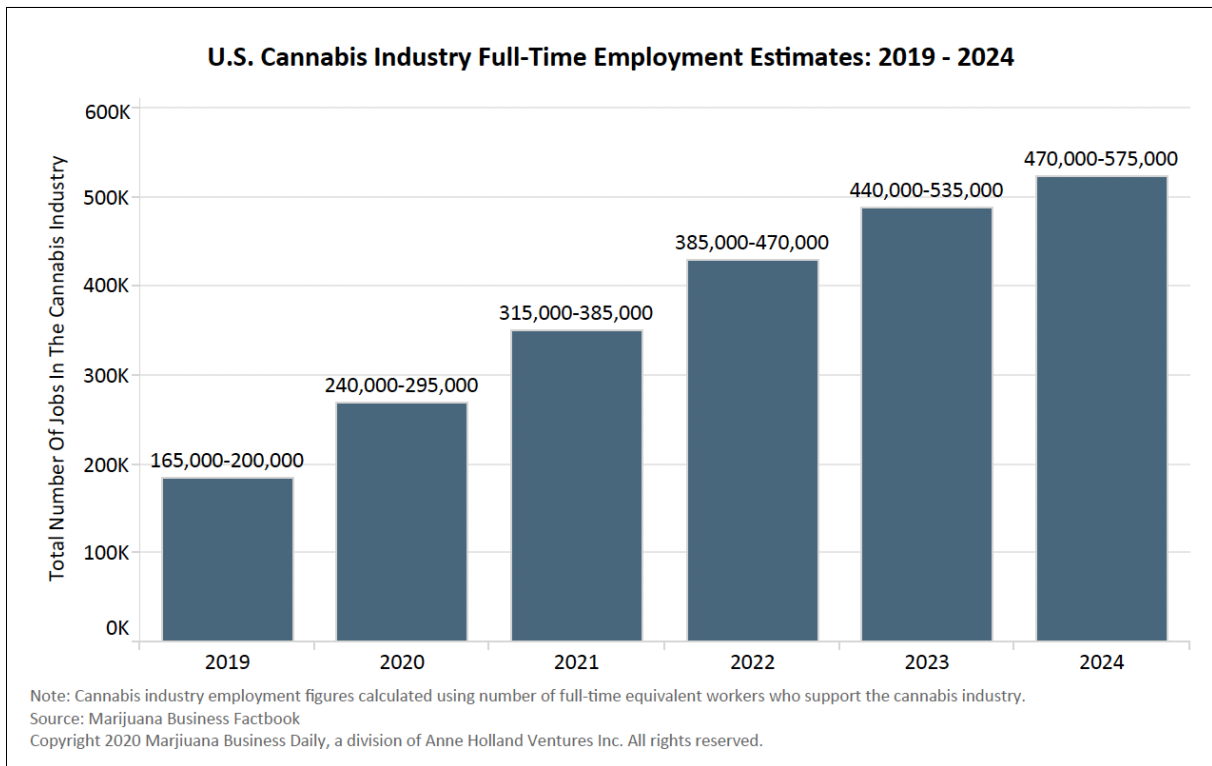
B. Adult-Use Industry Overview²

Recreational, or adult-use, cannabis is the inevitable trend of all states. The term “adult-use” is used to describe recreational cannabis markets because not all consumers use cannabis for

¹ Sources: *Medical Marijuana Access in the United States: A Patient-Focused Analysis of the Patchwork of State Laws*; 2017 Annual Report prepared by Americans for Safe Access; *The National Cannabis Economy: Joint Economic Committee*; December 2018; *Missouri’s Medical Marijuana Market: An Economic Analysis of Consumers, Producers, and Sellers*; Joseph H. Haslag, G. Dean Crader, William Balossi; *HIDTA Marijuana Legalization in the Midwest: The Potential Impact*; March 2019; *Marijuana Business Factbook*; *National Conference of State Legislatures*; *Statista.com*; *BDS Analytics*; *Grand View Research*; *Market Watch*; *MarijuanaSEO*

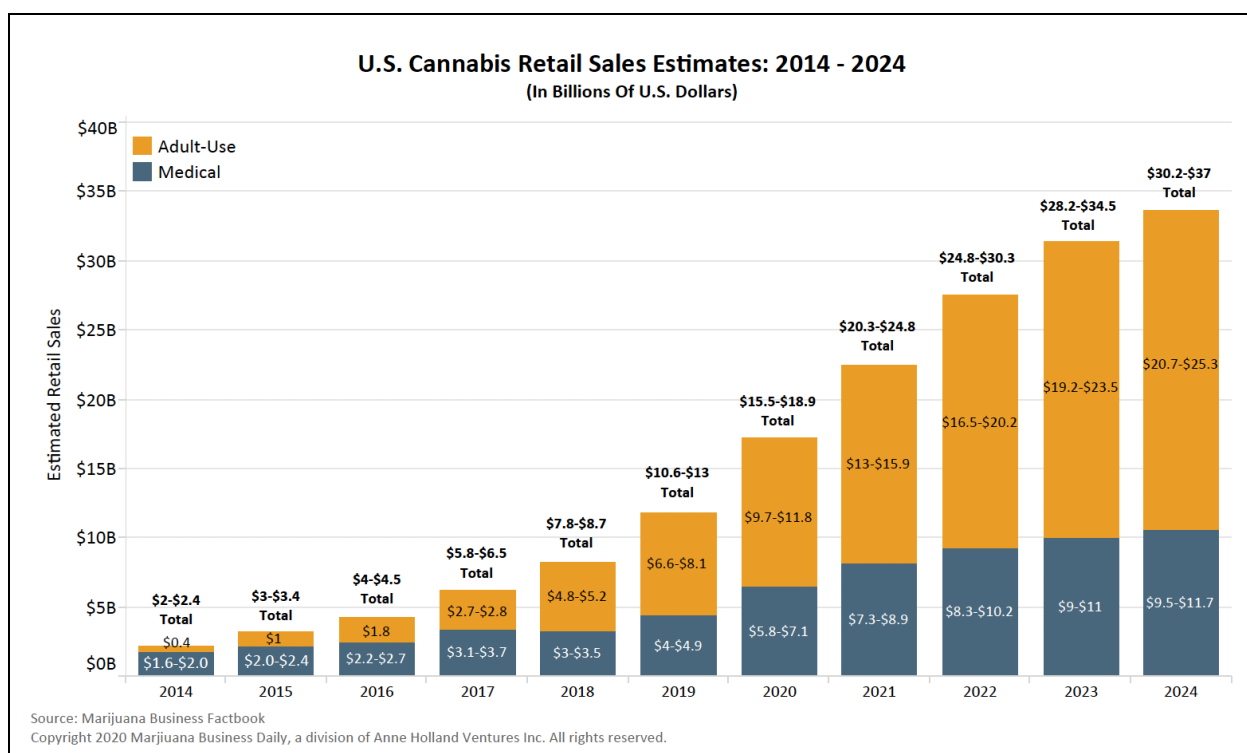
² Sources: *MJBiz Factbook*, 2020.

recreational purposes. As of June, 2021, 18 states, plus the District of Columbia and Guam, legalized adult-use cannabis.



Full-time employment estimates 2019-2024

Projections showcase the optimism of the adult-use industry. As provided by the above infographic, 2021 is predicted to bring upwards of 385,000 full time equivalent workers. Further, adult-use sales are expected to reach over \$30,000,000,000 (billion), tripling the expected sales of medical cannabis (just over \$10 billion in sales).



U.S. Cannabis Retail Sales Estimates for Years 2014-2024.

C. History of Cannabis Legalization in Massachusetts³

The 2016 ballot petition known as “Question 4” became Chapter 334 of the Acts of 2016. It created General Laws Chapter 94G which governs the adult use of marijuana and creates the Cannabis Control Commission (“Commission”). Chapter 334 and G.L. c.94G was amended by Chapter 55 of the Acts of 2017 (also known as The 2017 Act). Under the Act, the Cannabis Control Commission (CCC), established regulations with input from the Cannabis Advisory Board, stakeholders, and the public.

According to The 2017 Act, Cannabis may be purchased at a state-licensed dispensary. Cannabis can be consumed on private property, but marijuana products cannot be smoked, eaten, or vaped in public. Furthermore, cannabis products cannot be smoked where tobacco smoking is prohibited.

The State of Massachusetts Cannabis Control Commission (CCC) began accepting applications on April 1, 2018. Applications are accepted on a rolling basis with no limit to the number of licenses. As of May 20, 2020 there are 9 [license types](#) available:

- Retail Marijuana Dispensary - open. Limited to 8 in Amherst, MA. 5 have been issued.
- Marijuana Product Manufacturer - open and accepted on a rolling basis. No limit.

³ Sources: Cannabis Control Commission; Mass.gov; Cannabiswire.com

- Medical Marijuana Dispensary - open and accepted on a rolling basis. No limit.
- Marijuana Cultivator - open and accepted on a rolling basis. No limit.
- Craft Marijuana Cooperative (type of marijuana cultivator license) - open and accepted on a rolling basis. No limit.
- Marijuana Transporter - open and accepted on a rolling basis. No limit.
- Marijuana Research Facility - open and accepted on a rolling basis. No limit.
- Laboratories - open and accepted on a rolling basis. No limit.
- Microbusiness (A Microbusiness is a co-located Tier 1 Marijuana Cultivator, and/or Marijuana Product Manufacturer limited to purchase 2,000 pounds of marijuana from other Marijuana Establishments in one year. An applicant cannot have any stake in any other marijuana business in Massachusetts, and a majority of its executives must have been Massachusetts residents for no less than 12 months.) - open and accepted on a rolling basis. No limit.

Based primarily on arrest rates, the Commission has designated 29 cities as *areas of disproportionate impact*. Cities with a population of more than 100,000 people, such as Springfield and Worcester, will be subdivided to reflect that only certain neighborhoods qualify as *areas of disproportionate impact*:

Abington	New Bedford
Amherst	North Adams
Boston*	Pittsfield
Braintree	Quincy
Brockton	Randolph
Chelsea	Revere
Fall River	Southbridge
Fitchburg	Spencer
Greenfield	Springfield*
Haverhill	Taunton
Holyoke	Walpole
Lowell*	Wareham

Lynn	West Springfield
Mansfield	Worcester*
Monson	

*Asterisks notes that certain neighborhoods to be designated by the Commission.

As provided above, Greenfield has been designated as an Impacted area by the Commission. For this reason, EC Developments specifically sought this area for its operations so as to provide economic improvement to its residents.

IV. COMPETITION, RISKS, AND STRENGTHS

Competition

With cannabis dispensary and product data now going back over two years, our surveys of marijuana product availability in major US state markets reveal several clear indicators that the market is growing increasingly competitive and crowded.

One example of this is exhibited by the increase in the variety of branded products available at US dispensaries. Two years ago, the average US dispensary carried 94 different types of branded marijuana products. One year ago, that number had grown to 118, and by January of this year, a typical dispensary carried over 150 different branded products. A more mature market is providing a more diverse offering to cannabis consumers, but this also makes it much more competitive. How does a new entrant get its products on the shelf in a dispensary that already carries 5 competitor brands?

Additionally, the number of unique brands available at US dispensaries gives insight into the changing nature of the market as it matures. Throughout 2016 and into the early part of 2017, the number of brands grew, climbing from the low 1700s into the upper 1800s. However, since the start of 2017, that number has leveled off around the mid-1600s. Why the decline? There is some natural volatility to the market: some products may only be available seasonally, while other brands may fall out of the market after being squeezed out by competitors or otherwise failing to gain traction with consumers. The notable volatility in California at the close of 2017 and early 2018 saw many brands pulled from the shelves as they prepared for the new recreational market and regulations. 2016 was a year of tremendous growth for markets such as California and Oregon, with many brands entering in hopes of establishing a foothold in the booming market. By 2017, the increase in competition forced out many smaller brands, as evidenced by a slight decline in the number of brands available, despite continual increases in the number of dispensaries and products available. EC Developments will make its mark through vertical integration to ensure that our products receive exposure, and through creating unique offerings in the pre-roll space. As more states move toward legalizing marijuana, new opportunities are

opening for individuals to enter the market before it becomes saturated. Thus, EC Developments is seeking opportunities in the Commonwealth of Massachusetts through the acquisition and growth or sale of licenses.

Risks

The current risks we see include:

- Federal enforcement actions and policy implementation and local ordinances and regulatory limits or changes
- Pushback from politicians
- Lack of access to banking services
- Tax accounting restrictions
- Competition from illegal market sources
- New entrants to the business
- Lack of publicly available data

We will mitigate these risks by:

- Understanding and implementing the federal enforcement actions is part of our core business however, the US DOJ has signaled a policy of noninterference in legal marijuana states
- Positive and fruitful relationship with local city council, planning board, and mayor of Greenfield
- Evaluating 3rd party and developing in house solutions to tackle the lack of access to Tier 1 banking services
- Understanding and implementing 280E tax accounting solutions is part of our core business
- Although we “accept” the existence of illegal market sources as competition, we avoid any interactions and / or relationship with these parties
- New entrants to the business are an inevitable part of the capital consumer markets, whereby we feel we will have a strong advantage with our strategic relationship with HYC and our international divestment.
- With a host of editorial, newspaper, magazine and television articles, reports and surveys, we believe the public vote is beginning to reflect and improve the public’s perception of the industry.

Strengths

EC Developments brings a number of key strengths to the State. Its CEO, Emily Seelman, Esq. understands the cannabis industry through her years of cannabis consultancy work. Her expertise combines cannabis business start-up support with regulatory compliance, creating the framework for successful business operations. She has surrounded herself with external support, including her team at Canna Business Services, consultant Cory Waggoner, and CPA firm Bridge West.

Together, they bring decades of cannabis-specific experience, including direct operation of cannabis businesses.

Now more than ever, investors are realizing the importance of partnering with the right groups when investing their time, money, and reputation into a cannabis business. The cannabis industry, however, creates complex challenges from idea to customer and leads to changes in resources, processes, data, and tools. More than 92% of cannabis operators experience cost overruns. Over 85% experience schedule overruns. More than 89% received less than half of their expected revenues. The three owners of Colorado cannabis retailer, Sweet Leaf, were sentenced to prison in a landmark case due to the practice of “looping.” 25% of retailers and 35% of distributors in California were suspended over METRC noncompliance.

These inefficiencies and illegal practices are the results of poor planning, underestimation of time and resource requirements, not having the right resources, not understanding or using key features, not setting priorities, inadequate investments in marketing, training, and change management, inadequate performance testing.

EC Developments and the highly skilled team at HYC are compliance experts who will guide us through the complex and ever-changing legal landscape. Local and state laws dictate different business requirements. Over the last 7 years, HYC has developed a proprietary system of checks and balances to ensure we are operating in maximum possible compliance based on local and state laws. From best-practices establishing the appropriate business entities, to establishing correct business operations for tracking inventory and customers records, to internal bookkeeping and government reporting, HYC helps design and maintain industry-leading operations.

Shareholders considering investing in the marijuana industry unequivocally understand the importance of compliance. However, the physical practice of this in the current state of the industry is quite unique. HYC has a “first mover advantage” securing relationships with dispensaries, production facilities and product manufacturers which currently are not in full compliance. These services offer HYC a gateway to potential contracts, partners and/or acquisitions when the legal climate allows. HYC believes that when looking at future growth and operations in California, Pennsylvania or nationwide, it is paramount to note that each state's regulations dictate a different approach. The local and state laws define many ways to adapt the core business models, recognize the unique limitations and therefore opportunities within that state; the laws dictate who can purchase, source, grow, transport, or sell. Knowing the legal landscape and being in compliance is more than critical - it is unconditionally necessary. HYC has determined that the key is identifying similar patterns, strengths and standards in different states, and applying the “Colorado advantage” gained from HYC’s years of experience in this industry. The differences on a state-by-state regulatory basis form barriers to entry for some of our competitors and generate opportunities for us. The legal landscape is both complex and ever

changing. This coupled with the severity of penalties (DOJ, IRS, etc.) are strong barriers to entry and dictate that we operate to the letter of the law.

EC Developments will contract HYC's Compliance Team to ensure ongoing strict oversight of project management with experienced professionals. This oversight will occur in the HYC 3-Phase Approach:

1. Preparation
 - a. HYC will perform a compliance assessment and report.
 - b. An assessment, reconciliation, and report of the inventory tracking system.
 - c. Documentation collection and repository formation.
 - d. Creation of a plan of action, report and strategy.
2. Training and Implementation
 - a. Federal compliance training and implementation.
 - b. General compliance training and implementation.
 - c. Inventory protocols training and implementation.
3. Monitoring and Optimization
 - a. Standard operating procedures review and redline.
 - b. Additional training and evaluation of employee comprehension.
 - c. Compliance processes improvement training.
 - d. Continuous improvement on long-term compliance plan for operation.
 - e. Quarterly project management and compliance processes reporting.

EC Developments will avoid compliance missteps through its allocation of funds, time, and training towards this compliance SOP preparation and oversight.

Section 280E of the IRS code, prevents cannabis producers, processors and retailers from deducting expenses from their income, except for those considered as a Cost of Goods Sold (COGS). Therefore, marijuana businesses are required to determine what expenses are included in COGS and, therefore, what expenses are deductible. To date, very little guidance has been available to help taxpayers make this determination.

On January 23, 2015, the IRS released an internal legal memorandum outlining how Section 280E should be applied in the cannabis industry. Though this memorandum may not be used or cited by taxpayers as precedent it does outline how some IRS officials analyze Section 280E and how to determine COGS. In the memorandum, marijuana retailers and producers are required to compute COGS under inventory rules that predate the enactment of Section 280E. According to the memorandum, a retailer can include in COGS the invoice price of cannabis, less trade or other discounts, plus transportation and other "necessary charges" incurred in acquisition.

A producer may include in COGS direct material costs (such as seeds) and direct labor costs (such as planting, harvesting, sorting, cultivating). Indirect costs are included so long as they are “incidental and necessary for production,” such as the following:

- Repair
- Maintenance
- Utilities
- Indirect labor
- Indirect material and supplies
- Cost of Quality control

In addition, certain other indirect costs may be included (such as depreciation, excise taxes, factory administration expenses, and insurance), depending on accounting treatment. The memorandum outlines a very narrow reading of the cost included in COGS by suggesting that the IRS will not allow cannabis businesses to allocate purchasing, handling, storage and administrative costs to COGS.

The memorandum suggests that a cannabis producer or retailer should be on an accrual basis of accounting unless explicitly allowed to use the cash basis in the tax code (e.g., farmers and certain small businesses). Under the cash basis, a producer generally may deduct costs in the year of payment and includes income in the year cash is received. Under the accrual method, a producer would report income in the year it is earned and deduct costs in the year incurred. Taxpayers need to look at their specific facts to determine the impact of cash accounting vs accrual accounting, but it is important to note that the tax liability difference between these two accounting methods could end up being substantial.

EC Developments will obtain advice and guidance from experienced legal experts in the cannabis space in order to comply with IRS rules and regulations.

V. COMPLIANT BRANDING, MARKETING, AND SALES

After all inspections are completed and certificates are obtained, EC Developments will begin creating consumer awareness and brand adoption through branding, marketing, and demand generation.

Branding

Branding does not exist in a vacuum; it takes place over time. By getting it right from the beginning, a company can avoid brand confusion and wasted money pursuing the wrong customer segments. EC Developments will develop the mission, vision, and values of its cannabis businesses that will foster the EC Developments’s customer-centric and quality-focused reputation. EC Developments will lay the proper foundation through the preparation of a brand guide that outlines each brand and their logos, color palettes, typography, and customer segments.

Color Pallet

The first impression a consumer has of a product is visual. Thus, color plays an important role in corporate identity. The colors a company chooses are elemental to its brand. They have the potential to capture the eye and the potential consumer's attention just long enough to engage them further.

Some of the most iconic visual brand associations are based on their colors. When people think of the United Parcel Service (UPS), they think brown. In fact, *What can brown do for you?* became the brand's slogan for nearly a decade. Similarly, Pantene color no. 1837 — Tiffany Blue — is synonymous with luxury and expensive jewelry.

When it comes to cannabis branding and marketing, the majority of companies utilize different shades of green and “natural” colors. While there is nothing inherently inferior about those choices, the companies that stand out in the marketplace are those that embrace bold shades, such as spicy orange and neon green.

Typography

Typography plays an important role in communicating EC Developments's overall tone and quality. Its careful use of typography will reinforce EC Developments's brand personality, while also ensuring clarity and harmony throughout its communications, advertising, and marketing.

Logos

The best logo images are crisp, clear, and uncluttered. Most importantly, they are memorable and unique. Logo generators churn out tidal waves of images that trend toward the generic, which can cause confusion in their similarity to one another. EC Developments will develop distinctive, custom-designed logos for each brand that connects with the consumer's emotions, energy, or curiosity.

Marketing Plan and Demand Generation Strategy

To some, the terms “marketing” and “demand generation” are synonymous. Although used in similar contexts, the two concepts are not the same. In a general sense, if the goal is demand generation, then marketing is the means by which a business can achieve it.

Particularly, demand generation focuses primarily on building and maintaining customer relationships. According to HubSpot,⁴ demand generation is unique due to its “commitment to long-term customer relationships and a strategic mindset.” In the cannabis industry, building and nurturing relationships is vital to making customers happy and brand loyal.

⁴ Source: “What is Demand Generation?”, Hubspot Marketing, R. Puri, Jan. 21, 2014, updated Feb. 13, 2020, <https://blog.hubspot.com/marketing/what-is-demand-generation-faqs-ht>

Developing a solid demand generation strategy is key for cannabis success. With a thoughtful and deliberate strategy, EC Developments will see an increase in new customers over time, and an even greater amount of returning customers.

Marketing is the mechanism that facilitates demand generation. Cannabis marketing has to do with functionally executing strategies, such as printing flyers, posting on social media, and writing blogs. Each of these tools can be used to capture leads and cultivate customer relationships.

EC Developments will utilize the target customer profile built within its Branding Guide, and will focus on the customer's wants, needs, desires, likes/dislikes, and communication methods. Through its Marketing Development Plan, EC Developments will have a goal of introducing a compliant and unique marketing strategy to develop a positive identity for each of its brands. Marketing content will be personalized so as to narrow communication to its customer segment. This one-on-one communication allows EC Developments to directly interact with leads and begin to offer solutions to their needs and wants.

EC Developments will comply with standard cannabis regulations and the FDA in the development of its labeling and branding. For example, according to the National Association of Cannabis Businesses (NACB), cannabis business advertisements cannot appeal to minors. Packaging and labeling cannot contain colors or characters that would be attractive to children (e.g., cartoon characters).

While remaining in compliance with regulations surrounding marketing and advertising, EC Developments will develop a compelling website equipped for Search Engine Optimization (SEO) and social media platforms. Creating engaging content is what will support EC Developments's ability to connect with the consumer. Therefore, it will utilize professional videos, blogs, vlogs (video blogs), and podcasts focusing on customer-centric topics.

VI. COMMUNITY WELFARE

EC Developments seeks to provide opportunities for growth and aid to those living in low income areas. Through our Community Outreach Programs as described below, we hope to revitalize the community, provide aid to those who cannot adequately care for themselves, and continually use profits to give back to the community.

Community Relations

We seek to support our customers and substantially improve the welfare of communities in which they operate. It is the principal goal of the company to develop a reputable establishment and maintain operations as an upstanding corporate citizen and firmly rooted community leader. We are committed to reforming public perception of cannabis use and will provide all necessary measures to respect the comfort and dignity of our customers.

To ensure the effective Community outreach and relations efforts are critical components of a successful cannabis business development. Effective community relations planning is a continuous process that involves ongoing revisions and improvements. It is essential for new cannabis businesses to form and sustain healthy relationships with members of their communities to further the re-education of public perceptions of cannabis use and to maintain a respectable operational status.

Cannabis businesses of our projected community relations plan, additional measures will be developed for increased range of involvement in outreach and improvement efforts detailed below. We have initiated preliminary integration efforts by identifying gaps in localized resources and engaging in progressive relationship-building conversations with municipal authorities and residents.

In addition to our commitment to the betterment of the community at large, we are equally committed to establishing and sustaining dedicated ties between local and national wellness-centric cannabis community leaders.

A. Program Development, Implementation, and Expansion

Program Development

We will engage in productive community relationship-building efforts throughout the initial business development process and proceed to strengthen its network of agents, patients, vendors, neighbors and local business associations as a continuous business practice. Community relations measures in addition to those detailed below will be developed as new opportunities or amenable community service deficiencies in the community are identified.

Implementation

To facilitate the implementation of the Community Relations Plan, We will develop a strategic timeline containing a projected schedule of service events and available information concerning the initiation of those measures with potential for immediate application. At a minimum, initial efforts to expedite the actionable community services, events, networking and charitable contributions detailed in this section will be launched within the first year of operations.

Expansion

As we evolve to become an integral community member valued by individuals and businesses throughout the community, the company will take measures to ensure the sustained success of the community relations program. In addition to those standard policies and procedures detailed below, the company will continue to conceptualize new services, events, charitable contributions and additional offerings of value to the community. Our Community Relations Plan will

frequently be revised to include detailed policies and procedures for other contributions and services added to our program offerings.

Philanthropic Giving

- *Direct Giving:*
 - We are committed to donating a portion of net profits to local charitable organizations once profitable. This fund will assist local organizations whose missions align with the primary giving goals of the Company. These funds will be allocated to the organizations quarterly.
- *Fundraising Events:*
 - We recognize the value of a strong business network when engaged in fundraising efforts for local charitable organizations designated to receive regular donations. Establishing a reputation for hosting regular, successful fundraising events for community organizations will also increase the ability of the company to compel corporate sponsorships and donations for future events.
 - We will regularly host fundraisers to increase visibility and awareness of select charitable organizations within the community. Events will be centered on the local community and will encourage widespread participation by appealing to a broad audience and benefitting our chosen charities by hosting and sponsoring events like golf tournaments, bike and walk events, art auctions, and farmer's markets. The company will ensure programs and events are compliant with Department regulations.
- *Cannabis Research and Education Funding:*
 - A portion of net operating profit will be allotted for the development of a fund supporting the advancement of research and continuation of progressive cannabis studies. An independent board will grant awards to scientists, policy organizations, colleges and universities, advocacy groups and other institutions working to advance cannabis research. We are committed to partnering with law, science, research and business programs to develop advancements in cannabis policy, plant and lighting science, environmental science, and engineering. The Company will additionally assist in developing curriculum to teach the next generation of cannabis innovators.
- *Volunteer Service:*
 - The company's agents are encouraged to participate in volunteer activities. All full-time staff members are provided one paid day per month for volunteer work (approved by Human Resources).

- *Local Outreach and Community Improvement:*
 - We are committed to building a professional reputation among local merchants and maintaining strong relationships with small businesses in the community. During the process of initially establishing the company, efforts will be pursued to engage with local and neighborhood merchants' associations. Membership with such associations will be maintained as a vital component of the operational practices of the company, including attendance at regular meetings and participation in community programs.

VII. CONCLUSION

EC Developments represents a unique moment in history – one that rivals the repeal of prohibition, with the power and dynamics of an upstart industry, accelerated even more by the existence of internet-based business methods and social media. Reports show the United States cannabis market is currently developing faster than the smartphone and tablet industry and is ushering in a new era of early investors to compliment this revolution. EC Developments believes this is one of the most exciting eras in investing history.

We are living in an age of uprising, of revolution, of new ideals. Cultural relevancy is on everybody's minds and lips. Smart investors are doing their homework; and we're thankful that you've taken the time to learn our story and consider us as a part of your portfolio. Early movers in this multibillion- dollar market will surely have an advantage. Several large public companies have already reached sufficient size to list on the NYSE and a number of smaller entrants are trying to make their mark. The Cannabis industry is now in its adolescence, and new entrants such as EC Developments can benefit from lessons learned during the industry's infancy.

QUALITY CONTROL AND TESTING

1. EC Developments' Use of Unadulterated Cannabis and Compliance with Applicable Regulations and Law

EC Developments will only work with producers and cultivators who ensure cultivation of unadulterated cannabis and cannabis products and utilize good manufacturing and cultivation practices. EC Developments' *Cannabis Products Quality Assurance* standard operating procedures (CPQA SOPs) are in place to ensure that all cannabis products obtained by EC Developments' retail facility are contaminant-free and safe for use. The CPQA SOPs are drafted in accord with all applicable Cannabis Control Commission (the Commission) regulations. EC Developments' CPQA Plan features sanitation processes and protocols for both the facility and employees.

This robust testing plan will ensure that all products obtained from cultivators and producers are produced consistent with current good cultivation practices, and are held to rigorous testing standards. Accordingly, cannabis product testing will include analysis for potency, terpenes, heavy metal, solvents, pesticides, microbial contamination and shelf life. EC Developments will ensure that cannabis products were randomly sampled and tested by the cultivator, as well as by a Commission-approved independent testing laboratory, for contaminants and active ingredient analysis. This will enable EC Developments to ensure the highest quality products are available for distribution at the retail facility.

The Chief Compliance Officer (CCO) and Chief Operating Officer (COO) will jointly oversee the Retail Plan and quality assurance protocols, while the Quality Assurance Manager (QAM) and Retail Manager (RM) will share responsibility for implementation on a day-to-day basis. Both managers will report to both the COO and CCO.

EC Developments will implement quality systems controlled by SOPs and based on standard processes that are critical to product safety. EC Developments' quality control protocols and SOPs address the myriad of product safety requirements including, but not limited to, employee training requirements, proper equipment usage and maintenance protocols, sanitation standards, component and product handling and storage, quality control testing, and child-resistant packaging, product inserts, label disclosures and product traceability requirements as previously described.

The QAM will be responsible for day-to-day implementation of these quality systems, while the CCO will ensure that protocols comply with the Commission, Department of Health, and other state and federal regulatory agencies. EC Developments' SOPs provide for regular updates to all sanitation and testing measures, regular onboarding education, training and reinforcement for all members, and easy on-site and electronic access to all employees. The CCO is primarily responsible for incorporating into the SOPs any additions or amendments to regulations and

guidance or directives, and for staying current with best practices. The QAM is responsible for any updates to quality control measures and for ensuring department managers immediately implement these updates. All of EC Developments' employees will undergo onboarding and regular training on the SOPs applicable to their duties. Before performing any operation within EC Developments' retail facility, employees will be required to demonstrate comprehension of the CPQA SOPs.

All plans and SOPs will be centralized and controlled at EC Developments' retail facility, making them readily available for inspection by the Commission at any time upon request.

(a) Retail Operations, Product Safety, and Sanitation

EC Developments knows the quality of the cannabis product dispensed to any customer will ultimately be a function of the quality of that cannabis crop, the quality of the cultivation methods, and the quality of the retail procedures. For this reason, EC Developments will only obtain cannabis from the highest-quality producers and cultivators who place an emphasis on quality control and testing of cannabis products.

In addition, EC Developments' COO and CCO will share primary responsibility for maintaining safe, sanitary and compliant facilities. The QAM will report to both executives, and is responsible for maintaining and overseeing day-to-day adherence to CPQA SOPs which are expressly designed to prevent contamination operation-wide. All floors, walls, and ceilings will be constructed to allow them to be kept clean and in good repair at all times. Adequate space and safety lighting will exist in all processing and storage areas, as well as areas where equipment or utensils are cleaned. Likewise, buildings, fixtures, and other physical facilities will be maintained in a sanitary condition at all times. A high-level summary of the safety, sanitation and compliance features of EC Developments' facility appear below.

(i) Water Supply

EC Developments' water supply will be sufficient for chosen operations, and will be derived from a source that is a regulated water system. Any private water source will be capable of providing a safe, potable, and adequate supply of water to meet retail facility standards.

(ii) Plumbing

Similarly, EC Developments' plumbing will be of adequate size and design, as well as adequately installed and maintained, to carry sufficient quantities of water to required locations throughout the facility. Plumbing will properly convey sewage and liquid disposable waste from the facility. No cross-connections between the potable and wastewater lines will exist. Waste treatment and disposal systems will be maintained in good working order so that they do not constitute a source of contamination in any area.

(iii) Hand-Washing Facilities

Likewise, plumbing, bathrooms, and hand-washing facilities will be compliant with local ordinance and codes and be properly maintained. All drain areas will be maintained so that they do not contribute to the contamination of any cannabis, cannabis products or contact surfaces by seepage, filth or any other extraneous materials or by providing a breeding place for pests. Hand-washing facilities will be adequate and convenient, and furnished with running water at a suitable temperature. Hand-washing facilities will be located in the licensed premises where good sanitary practices require employees to wash and/or sanitize their hands, and provide effective hand-cleaning and sanitizing preparations and sanitary towel service.

(iv) Restrooms

EC Developments' newly constructed facility will provide adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair. An employee appointed by the QAM will perform or oversee a daily walkthrough to ensure toilets, hot running water, toilet paper, disposable towels and soap are available at the facility. Regular maintenance will be scheduled by the QAM to ensure toilet facilities are maintained in a clean and functioning condition to ensure that cannabis is protected from contamination due to personal hygiene.

(v) Ventilation Systems

The QAM will ensure each facility has adequate ventilation and contains equipment for adequate control over air pressure, microorganisms, dust, humidity, and temperature. The QAM will also ensure the facility utilizes sufficient filtration systems.

(vi) Screening to Prevent Pets and Animals

Animals are prohibited from the facility, except the service dogs of approved visitors and employees may be permitted in some areas of the facility if no risk of contamination of cannabis, cannabis products or contact surfaces exist. EC Developments' retail facility will have adequate screening or other protection to protect against the entry of pets and pests.

(vii) Pests Prevention*

As discussed fully above, EC Developments' new facility will be designed, managed and monitored to keep out pests, including insects, rodents, and other animals. For example, litter and waste will be promptly removed and disposed of to minimize the development of odor and potential for attracting and harboring pests.

(viii) Cleaning and Sanitizing Employees

*However, insecticides, fungicides or rodenticides will not be used in or around the facility unless registered with the Commission, as may be required, and then only in accordance with labeled instructions and EC Developments' safety protocols. Likewise, toxic cleaning

compounds, sanitizing agents, solvents used within the retail facility will be identified, held, and stored in a manner that protects against contamination of cannabis.

(ix) Litter and Waste

Litter, rubbish, and waste will be properly removed, and the operating systems for waste disposal will be maintained in an adequate manner so that they do not constitute a source of contamination in areas where cannabis plants are exposed. Rubbish will be disposed of so as to minimize the development of odor and minimize the potential for the waste becoming an attractant, harborage or breeding place for pests.

(x) Facility Sanitation and Employee Hygiene

The COO will have ultimate responsibility for ensuring that the retail facility is maintained in sanitary conditions to optimize the safety of employees, visitors, and cannabis products. Department managers will maintain written procedures describing in sufficient detail the cleaning schedules, methods, equipment and materials to be used in cleaning the facility. Written procedures will be followed, and records of cleaning and sanitation will be kept in the Facility Maintenance Schedule overseen by the QAM. All contractors will be informed of and held to sanitation standards while working on EC Developments' premises. All employees will be required to report any unsanitary conditions in the facility to their respective manager. Critical areas will be clean and free of any contamination risks at the end of each shift.

Any mold found in the facility will be addressed by a mold removal expert immediately. Department managers will ensure employees are trained in proper personal hygiene, with specific attention to preventing microbial contamination of handled cannabis. The QAM will ensure hygiene policies are enforced including, but not limited to, employees' health and cleanliness, hand-washing areas and hand-washing requirements.

(xi) Employees Prohibited from Handling Cannabis

EC Developments will not permit employees who work in any product handling operation, who, by medical examination or supervisory observation, appear to be sick, or have open wounds, sores, or skin infections.

(xii) Prevention of Foodborne Cases of Viral Gastroenteritis

Food handling employees who test positive for Norwalk virus, Norwalk-like virus, norovirus or any other calicivirus may not handle food or cannabis for either 72 hours past the resolution of symptoms or 72 hours past the date the positive specimen was provided, whichever occurs last. In outbreak circumstances consistent with Norwalk virus, Norwalk-like virus or other calicivirus infection, affecting customers or employees, all employees may be required to provide stool specimens for testing.

(xiii) Safety Precautions and Protocols for COVID

At EC Developments' facility, the health and safety of customers and employees is paramount. In response to the COVID-19 pandemic, executive leadership has prioritized the development of a comprehensive, enterprise-wide safety plan to mitigate against the known risks of transmission. These preventative protocols and precautionary measures are modeled after the existing *Customer and Product Safety* SOPs, and are outlined below. All decisions related to COVID-19 will be based on science, best compliance practices, and Centers for Disease Control and Prevention (CDC) guidelines. EC Developments will always air on the conservative side of caution, and do what is in the best interest of customers and employees. Finally, EC Developments will engage the services of a COVID compliance expert to review and oversee the implementation of the COVID-19 Safety Plan (C19SP).

(xiv) Masks and Personal Protective Equipment (PPE)

Though these regulations are frequently shifting, EC Developments will strictly follow CDC guidelines, and all state and local rules and guidelines. Certain PPE is required depending on cleaning products used, including, but gloves, gowns, safety glasses, face coverings, hair coverings, shoe coverings, etc.

(xv) Personal Hygiene Measures

Good hygiene, especially frequent hand washing, helps to prevent the spread of illness, especially COVID-19. All EC Developments employees will be required to follow proper hygienic measures described below.

Employees are to wash their hands frequently with soap and warm water for at least 20 seconds:

- Before and after work shifts;
- Before and after work breaks;
- After handling money, before performing another activity;
- After blowing their nose, coughing, or sneezing;
- After using the restroom;
- Before eating or preparing food; and
- After putting on, touching, or removing cloth face coverings.

EC Developments will display placards, images, and a short video demonstrating proper hand-washing techniques, and will ensure employees have easy access to handwashing areas. Additionally, touchless stations will be set up facility-wide with hand sanitizer that contains at least 60% alcohol. The following protocols for cleaning uniforms, PPE and other laundry will be implemented.

- All EC Developments-issued items to be laundered should remain on the premises.
- Changing areas will be provided and sanitized regularly.
- Clean and dirty laundry should be separated in clearly labeled bins.
- Employees should wash their hands immediately after touching dirty laundry.

- Personally-owned masks or PPE must be washed thoroughly, according to the directions, and after each use.

(xvi) In Person Employee Interaction

Employees will be expected to comply with the following guidelines for all employee interactions whenever feasible. These guidelines will be frequently adjusted and clarified as needed based on evolving state, local and federal regulations.

- Virtual meetings and telework will be encouraged and implemented as much as possible.
- If an in-person meeting is absolutely necessary, employees will be seated six feet apart and wear face coverings, as described above.
- All surfaces with which employees come in contact will be wiped down before and after each use.
- For contact tracing purposes, an accurate accounting of who was present at each meeting will be maintained for at least one month.
- Arrival times, breaks, lunch, and departure times will be staggered to limit employee interactions.
- Elevators and stairwells will be limited to two people at a time.
- Restroom capacity will be reduced by 50%.
- Physical signature requirements will be eliminated if unnecessary or replaced with a touchless practice.

(xvii) Reporting to Local Health Department

Any manager or executive who knows or has reason to believe that an employee has contracted any disease transmissible through cannabis or food or has become a carrier of such disease, will report to the local Department of Health immediately.

(xviii) Contact with Cannabis

In strict compliance with the Act, any employee working in direct contact with the preparation of cannabis materials or cannabis products will maintain adequate personal cleanliness including clean and appropriate work clothing, trimmed and clean fingernails (without polish or gloved) and wearing protective apparel as directed by a department manager, as is necessary to protect cannabis and cannabis products from contamination. The employee will also wash hands thoroughly in an adequate hand-washing area before starting work and at any other time when hands may have become soiled or contaminated (*i.e.*, after restroom breaks or handling cash). Cannabis that can support the rapid growth of undesirable microorganisms will be held in a manner that prevents the growth of these microorganisms. As such employees will be required to wear protective gloves when handling cannabis and cannabis products, and will be required to adhere to the below hand-washing policies.

(xix) Hand-Washing Policies and Procedures

In addition to stopping the spread of communicable diseases, maintaining adequate personal cleanliness, particularly with respect to hand-washing is critical for maintaining sanitary operations suitable for cannabis retail operations. As such, instructive hand washing signs in multiple languages will be clearly displayed and maintained in appropriate areas such as bathrooms, kitchens and lunch areas. Department managers will enforce hand-washing policies, and employees are encouraged to self-monitor. EC Developments will also post the following instructive SOP.

SOP: Employee Hand-Washing Procedure	
Role	All Employees Engaged in the Sale of Cannabis and Cannabis Products
1	Clean exposed portions of arms, including surrogate prosthetic devices for hands and arms, for at least twenty (20) seconds using cleaning compound in hand-washing sink
2	Apply amount of cleaning compound recommended by manufacturer
3	Rub together vigorously for at least fifteen (15) seconds while paying particular attention to removing soil from underneath the fingernails during the cleaning procedure; and creating friction on the surfaces of the hands and arms, fingertips and areas between the fingers
4	Thoroughly rinse under clean, running water
5	Immediately follow the cleaning procedure with thorough drying

(b) Record Maintenance

EC Developments understands the value in maintaining its records to ensure quality in its product output to customers. As such, EC Developments will maintain strict control over its records to monitor the progress of its company, to provide operating data to management, information to advisors and board members, and document operations for third-party certifiers or auditors. Records of operations will also be retained to support or refute in case of any insurance claims, legal queries, and/or administrative investigation.

Inventory records will be managed daily, weekly, and monthly and include checks and balances from multiple people. A designated agent will be responsible for recording daily inventory at the beginning and end of each shift. The Dispensary Manager will be responsible for overseeing shall oversee daily paper and electronic entry pertaining to all inventory transactions. Agents at

each facility are responsible for maintaining an inventory log to record the date of each inventory process, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory.

Cycle Counts Required:

1. Shift counts:
 - a. Sales
 - b. Cannabis products on the sales floor
 - c. Cash in drawer
2. Daily counts:
 - a. Cannabis products secured in sales area
 - b. Daily sales
 - c. Daily receipts
3. Weekly counts:
 - a. Cannabis products in secured storage
 - b. Weekly sales and receipts totals
4. Monthly counts:
 - a. Two agent count of all inventory – cannabis and non-cannabis
 - b. Manager reconciliation to inventory system
 - c. Administrative reconciliation of all sales and receipts
5. Quarterly counts:
 - a. Manager physical count of all inventory
 - b. CEO review of all discrepancies and reports
6. Annual counts:
 - a. Complete inventory of all inventory and assets

2. Testing Reports to Ensure Safe and Contaminant-Free Cannabis

EC Developments will request accurate final test reports and certificates of analyses from all producers and cultivators from whom cannabis products are obtained. Hard copy and electronic copies of third-party laboratory testings will be retained on file and will be made available at the Commission's request.

EC Developments will use a S2S to track and trace all cannabis products and inventory. The COO will ensure the S2S is accurate and capable of producing, upon request, reports on all cannabis stored including waste inventory which will be recorded in the Waste Disposal Log and S2S accordingly.

RECORDKEEPING PROCEDURES

EC Developments will maintain records that conform to Cannabis Control Commission (the Commission) regulations and best practices for the industry to ensure accurate recordkeeping. EC Developments' recordkeeping policies and procedures demonstrate not only compliance with legal and regulatory requirements, but a commitment to full documentation and transparency of all operations. EC Developments will maintain strict control over records to provide accurate and timely operating data to management, document operations for third-party certifiers or auditors, and records of operations in case of any insurance claims, or legal or administrative investigation(s).

EC Developments will maintain documentation in a secure, locked location for at least three (3) years from the date of the documents' production. Reports will be issued for security alarm system failures stemming from a loss of electrical power or mechanical malfunction that is expected to last longer than eight hours. Reports will also be issued for discrepancies identified during inventory suggestive of diversion, theft, loss, and/or any criminal action involving the Commission or an agent. Reports will also be issued for any unauthorized destruction of cannabis, any loss or unauthorized alteration of records, or other breach of security.

EC Developments will operate with full transparency for all stakeholders, including agents, regulators, qualified dispensaries, law enforcement, and local officials. The company will maintain true, complete, and current records available for inspection by the Commission or other authorized authorities upon request. Exceeding the requirements set forth by the Commission, records will include those related to written operating procedures, inventory records, seed-to-sale (S2S) electronic tracking system records (*see* 935 CMR 500.105(8)(c),(d)), policies, procedures, security records, audit records, staff training plans and completion documentation, staffing plan, and business records. In addition, personnel records will also be available for inspection by the Commission, including the following:

1. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
2. Corporate records, including the following:
 - a. Insurance coverage policies and related documentation;
 - b. Contracts with all ancillary businesses, including equipment companies, third-party laboratories, packaging companies, etc.
 - c. Commission documentation, including Annual Agent Registrations and Marijuana Establishment Registration;
 - d. Local permitting and documentation, such as Special Use Permits, Certificate of Occupancy, documentation related to any variances obtained, preliminary and architectural drawings and site plan approvals.

- e. Corporate filing documentation, annual renewals, bylaws and/or operating agreements, and annual reports.
- 3. A personnel record for each EC Developments agent. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with the cannabis establishment and shall include, at a minimum, the following:
 - a. All materials submitted to the Commission;
 - 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 Training Program and in-house training for EC Developments agents.
- 3. A staffing plan that will demonstrate accessible business hours and safe retail facility conditions;
- 4. Personnel policies and procedures, including, at a minimum, the following:
 - a. Code of ethics;
 - b. Whistle-blower policy; and
 - c. A policy which notifies persons with disabilities of their rights under <https://www.mass.gov/service-details/about-employment-rights>, including provisions prohibiting discrimination and providing reasonable accommodations; and
 - d. All background check reports obtained in accordance with Commission regulations and Criminal Offender Record Information (CORI).

Similarly, management will be trained to keep and maintain records that clearly reflect all financial transactions and the financial condition of the business. These records will be kept and maintained on the licensed premises for a five-year period and will be made available for inspection as requested by the Commission, and, when applicable, Massachusetts's Department of Revenue. These records include manual or computerized records of:

- 1. Assets and liabilities;
- 2. Monetary transactions;
- 3. Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
- 4. Sales records, including the quantity, form, and cost of cannabis products;

5. Salary and wages paid to each employee, stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over the cannabis establishment;
6. Purchase invoices, bills of lading, manifests, sales records, copies of bills of sale and any supporting documents, including the items and/or services purchased, from whom the items were purchased, and the date of purchase;
7. Bank statements and canceled checks for all accounts relating to EC Developments;
8. Accounting and tax records related to EC Developments;
9. Records of all financial transactions related to the retail facility, including contracts and/or agreements for services performed or received that relate to EC Developments;
10. All employee records, including training, education, discipline, etc.;
11. Retail records, including:
 - a. The sales of all cannabis and cannabis products;
 - b. Disposal of cannabis, cannabis-infused products and waste materials associated with production, including:
 - i. A written record of the date, the type and quantity disposed of or handled,
 - ii. the manner of disposal or other handling,
 - iii. the location of disposal or other handling,
 - iv. the names of the two agents present during the disposal or handling, with their signatures.
 - v. These records will be kept for an extended period of time if any enforcement action is taken.
12. Records of each batch of extracts or cannabis-infused products in inventory, including, at a minimum, the usable cannabis or trim, leaves, and other plant matter (including the total weight of the base product), any solvents or other compounds utilized, and the product type and the total weight of the end product produced (i.e., hash oil, shatter, tincture, infused dairy butter);
13. Transportation records;
14. Inventory records;
15. Records of all samples sent to an independent testing lab and/or the Commission's lab and the quality assurance test results;
16. All samples provided to anyone or any entity for any purpose; and
17. Any records of theft, loss or other unaccountability of any cannabis seedlings, clones, plants, trim or other plant material, extracts, cannabis-infused products, or other items containing cannabis.

Within ten (10) calendar days, EC Developments will provide the Commission with written notice of any incident described in 935 CMR 500.110(7)(a). This notice will include a detailed incident report with the investigation, findings, resolution (if any), and confirmation that law enforcement and the Commission were notified within twenty-four (24) hours of discovering the

breach, and any other relevant information. Reports and supporting documents, including photos and surveillance video related to a reportable incident, will be maintained by EC Developments for no less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities upon request.

The Chief Operating Officer (COO) will ensure these records are accurate and securely maintained and properly preserved. Should the retail facility close, all records will be preserved for at least 3 years, or longer if requested by the Commission, in a form and location that is acceptable to the Commission, at the expense of EC Developments.

A visitor sign-in and sign-out record will be maintained at the security office. The record will include the visitor's name, address, organization or firm, date, time in and out, and the name of the authorized agent who will be escorting the visitor, as applicable.

EC Developments will keep true, complete, legible, and current books and records of the following:

1. The amount of cannabis transported to another facility;
2. The date of each sale or distribution to a registered cannabis organization;
3. The name, address and registration number of the cannabis organization;
4. The item number, product name (description), and quantity of cannabis registered by the Commission and sold or otherwise distributed to the cannabis organization;
5. The price charged and the amount received for the cannabis from the cannabis organization;
6. The reason for the distribution, if the distribution was for a purpose other than sale; and
7. The quantity and form of cannabis maintained at the facility on a daily basis.

MAINTAINING OF FINANCIAL RECORDS

EC Developments places in high priority the maintenance of financial records, maintaining all financial records in accordance with generally accepted accounting principles, as discussed below. As such, it will abide by the following standard operating procedures (SOPs) for the handling of cash on the premises, including but not limited to storage, collection frequency, and transport to financial institution(s).

EC Developments will remain in compliance with Commission regulations including those relating to maintenance of financial records. Through the experience of its leadership team in ensuring ongoing compliance in recordkeeping, EC Developments is confident in its ability to develop and maintain SOPs that result in up-to-date, accurate, and compliant financial records.

1. Overview

EC Developments will keep financial records in accordance with generally accepted accounting principles (GAAP). These financial records will include ongoing documentation of assets and liabilities; all monetary transactions; books of accounts such as journals, ledgers, supporting documents, agreements, checks, invoices, and vouchers; and salaries and wages paid to all employees, stipends paid to each board member and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with EC Developments.

EC Developments will implement SOPs designed to protect important and confidential records while ensuring that EC Developments is in full compliance with Commission regulations, generally accepted accounting principles, and all other applicable laws, regulations, and local rules. EC Developments's financial records maintenance is designed so that all employees know their role in recording and maintaining records.

EC Developments' SOPs governing the maintenance of financial records will ensure that records are organized, to facilitate proper and timely retrieval of records, and to document program compliance. EC Developments' management and leadership team will be responsible for managing compliant physical and digital records, conducting record reviews and audits, updating the record keeping SOPs, and fulfilling record requests by the Commission and law enforcement. The result will be a robust, transparent set of records for EC Developments' facility.

2. Types of Financial Documentation

EC Developments will maintaining, at minimum, the following list of business records, in accordance with 935.CMR.500.105(9)(e), which shall include manual or computerized records:

- 1. Assets and liabilities;
- 2. Monetary transactions;

- 3. Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
- 4. Sales records, including the quantity, form, and cost of cannabis products; and
- 5. Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over the marijuana establishment.
- 6. Compliance with liability insurance coverage or maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16);
- 7. Fees paid under 935 CMR 500.005 or any other section of the Commission's regulations; and
- 8. Fines or penalties, if any, paid under 935 CMR 500.550 or any other section of the Commission's regulations.

Other financial records subject to retention include paper and digital business records: assets and liabilities; monetary transactions; books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers; salary and wages paid to each employee, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with the company.

3. Renewal Documentation

In compliance with Commission regulations, EC Developments will make available an accounting of the financial benefits accruing to its municipality, Greenfield, as the result of its host community agreement with the City. EC Developments will engage in an ongoing mutually beneficial relationship with the City and will work with the City to ensure its cost-benefit information is regularly updated.

4. Financial Record Preservation

EC Developments will retain records from separate accounting practices at the point-of-sale for cannabis and cannabis product sales. The records will be kept so long as their contents are material in the administration of Massachusetts tax laws. At a minimum, unless the Commissioner consents in writing to an earlier destruction, the records must be preserved until the statute of limitations for making additional assessments for the period for which the return was due has expired; generally, this is three years after the due date of the return or the date the return is actually filed, whichever occurs later.

In excess of minimum retention schedules, EC Developments will retain a digital copy of all records subject to retention and inspection indefinitely. Paper records will also be digitized and

stored indefinitely. All records will be furnished to the Commission or duly authorized party such as law enforcement immediately upon request.

5. Financial Record Format and Storage

EC Developments's records will be kept in paper and digital formats in accordance with the Company's SOPs. Upon receipt of a license, EC Developments will begin implementing METRC as the Company's inventory tracking system (ITS). EC Developments's point of sale (POS) system will be fully integrated with METRC to ensure transparency and efficiency in all records handling.

All physical records will be securely stored in a locked, fireproof filing cabinet in the restricted Security Office. Vendor-specific documents will be stored and categorized by vendor and date of record creation. Production batch records, sales receipts, shipping manifests, inventory audit reports, quarantine records, waste and destruction records, and other internal documents and files will be stored chronologically and by document type.

Confidential information will be maintained in a secure location, kept separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the Commission may access this information to carry out its official duties.

Physical records may be scanned and stored as duplicate electronic files. The employee responsible for scanning the document, will also log the information indicating that the document has been duplicated and stored electronically. All hard copy records will be kept for no less than one (1) year, unless mandated otherwise by the Commission or State government, or stated herein.

As part of its record keeping protocol, EC Developments will utilize its POS system, and accounting software, as well as an encrypted storage drive to upload and maintain digital records on the Company computer system. All digital records will be stored and maintained in such a way as to guarantee confidentiality, access to the Commission for audits, protections against unauthorized changes to data, and an audit trail to monitor all modifications to records. To safeguard digital records, EC Developments will institute Internet Protocol (IP) Security. All company computers will be protected with antivirus/malware software and daily IP scans will be conducted. Digital records will be encrypted, and only accessible by the RT. All employees involved in the record keeping process will receive training for the Compliance Manager on proper record keeping procedures, including compliance and confidentiality. All digital records will be kept for no less than one (1) year, unless mandated otherwise by the Massachusetts Cannabis Control Commission (Commission) or state agency or otherwise as listed below.

6. Record Requests

Records will promptly be made available to the Commission and law enforcement upon request. EC Developments' Chief Financial Officer (CFO) will locate and release the information to the Commission as soon as possible but no later than the end of the business day, unless the Commission grants more time to complete the request. Other parties who request or require records will receive a timely response from EC Developments within one business day or in accordance with other mandates. SOP's will require that every record request is documented and retained in the Security Office along with a copy of any records that were released. If electronic recordings, physical or digital copies of documents, or products are released to the Commission or law enforcement, the items will be prepared to remain compliant with chain of custody SOPs.

7. Record Destruction

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

The Director of Compliance is responsible for identifying which, if any, records must be destroyed and for overseeing their destruction. Duplicate physical documents printed for use in operations, documents with incorrect information, and other unnecessary documents are all examples of documents that can and should be destroyed in order to limit the amount of paper records in storage to pertinent documentation. Destruction of all physical records and other business documents will be accomplished by cross-shredding. Any documents to be shredded will first be scanned and uploaded as encrypted, electronic files in a file titled "Destroyed" to ensure that there is a full and complete record of all business and operational information held by EC Developments at all times.

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

8. Audits and Training

In accordance with its mission of transparency, EC Developments will train all staff to understand how financial recordkeeping is applied throughout daily operations. Agents will be trained on the above financial requirements, including regulations applicable to medical-use and adult-use.

To ensure compliance with EC Developments SOPs, EC Developments will conduct, at minimum, monthly audits of software, platforms, equipment, and data to ensure no additional software or other methods have been used to alter or manipulate sales data. The record of monthly review will be retained and made available to the Commission upon request.

EC Developments' retail facility will only utilize an inventory system approved by the Commission, in consultation with the DOR. It will never utilize software or other methods to manipulate or alter sales data and will immediately terminate and report any individual found doing so, or attempting to do so.

EC Developments will conduct, at minimum, a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. It will maintain records that it has performed the monthly analysis and produce it upon request to the Commission. Should EC Developments find that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data, it will immediately disclose the information to the Commission, will cooperate with the Commission in any investigation regarding manipulation or alteration of sales data, and will take such other action directed by the Commission.

EC Developments welcomes the Commission and the DOR to audit and examine its POS system in order to ensure compliance with Massachusetts tax laws and Commission regulations. EC Developments will maintain and provide to the Commission on a biannual basis accurate sales data collected by the licensee during the six months immediately preceding this application for the purpose of ensuring an adequate supply of cannabis and cannabis products.

ENERGY COMPLIANCE PLAN

1. EC Developments' Ethos of Community Stewardship Extends to the Environment by Integrating Energy-Efficient and Environmentally Conscious Best Practices

(a) Overview of Environmental Stewardship Plan

EC Developments is eager to contribute to the ongoing efforts of Massachusetts' citizens and community leaders to revitalize the economy and contribute to the local community. This ethos of community stewardship extends to EC Developments' environmental and energy plans. As a responsible member of the community, EC Developments is committed to fostering relationships with neighboring businesses and residents, as well as with local law enforcement. Beyond its secure retail facility outfitting to instill trust and ensure safety, EC Developments has also designed a thoughtful environmental plan that conserves natural resources, mitigates odor, reduces energy consumption, and protects the environment.

Mindful of the vital importance of continuous climate control, EC Developments has prioritized its acquisition of energy-efficient certified HVAC and lighting systems, environmentally friendly air purification and odor mitigation systems, humidity controls, CO₂ regulation systems, and plumbing systems.

EC Developments believes in the importance of minimizing its carbon footprint, environmental impact, and resource needs for its facility, and will abide by Franklin County and Greenfield ordinances regarding environmental issues. As a team consisting of many local employees, EC Developments has a vested interest in instilling environmentally friendly practices to protect its community and surroundings. This includes applying environmentally friendly initiatives with regard to resource consumption, including electricity, water, and gas. Additionally, EC Developments will adhere to green policies that reduce environmental toxins and noxious odors.

EC Developments will continuously implement best practices that reduce overall negative environmental impact. These include the use of controls, sensors, and timers to reduce energy consumption, including lighting and temperature controls at its facility. Additionally, EC Developments seeks to have superior air quality within its facility with the use of an up-to-date air purification system in order to protect its employees, visitors, and cannabis products from exposure to any airborne contaminants or noxious odors. EC Developments seeks to become a leader in sustainable practices within the State, demonstrating a safe and effective means to reduce overall carbon footprint.

By reducing resource needs, EC Developments will improve overall efficiency within the facility while also reducing its negative impact on the environment. As a result, the company will facilitate in lowering greenhouse gas emissions, reduce the impact on climate change, and protect the surrounding environment. EC Developments plans to employ local vendors,

contractors, and suppliers who supersede minimum environmental regulations and employ environmentally friendly practices. Additionally, EC Developments seeks to achieve the globally recognized Leadership in Energy and Environmental Design (LEED) certification. All of these methods have been successfully deployed by EC Developments' leadership teams, resulting in their compatibility with neighboring properties and the surrounding community. Specifically, EC Developments will minimize its impact on the surrounding environment and limit resource demands by taking the following initial steps with respect to its facility design.

(b) Facility Envelope Intake and Exhaust Fans With Activated Charcoal Filters to Purify Air and Mitigate Odor

To maintain superior air quality and mitigate odor facility-wide, EC Developments will install exhaust fans leading out of the overall facility envelope with an activated charcoal filter that will serve to combat odors and contaminants. To further ensure the highest quality of environmental air and address energy sustainability issues, EC Developments will employ the use of evaporative coolers to be used as inlet fans with High Efficiency Particulate Air (HEPA) filters into the facility's overall envelope. This also provides a more cost-effective alternative to operating an HVAC system to cool the overall interior of the facility.

Another sustainable energy option is to add transparent panels along the upper portion of the facility walls to lessen the power load needed to light the inside of the facility. To further ensure the highest quality of environmental air both internally and externally, EC Developments will explore options for incorporating a negative air machine with an air-scrubbing technology, which will be particularly helpful with areas of operational activities that produce greater levels of air contaminants.

(c) Energy Consumption and Temperature Regulation With Systems that Remove Excess Moisture, Odors, and Contaminants

Additionally, EC Developments intends to exceed the U.S. Department of Energy's recommendations for temperature regulating. This includes regulation-standard insulation for temperature control and minimization of heating/cooling needs. Likewise, for the benefit of EC Developments' retail employees, as well as the cannabis products, the HVAC system installed in the retail area will be outfitted with a UV and HEPA filtration system.

EC Developments will also have ultra-efficient air conditioning and heating units installed by an HVAC specialist to minimize energy consumption and maximize heating/cooling efficiency. This system will provide indoor air quality, removing excess moisture; odors; smoke; and airborne contaminants, including dust, bacteria, and unwanted gases. This is essential for the health of all employees and visitors, as well as for the protection of EC Developments' cannabis products. Additionally, this system is designed to work as efficiently as possible, reducing excess energy consumption and with minimal waste. The facility will also employ a zone control system in

order to heat and cool areas specific to its needs. The combined efforts of these practices will reduce energy output significantly. All HVAC systems will comply with the Massachusetts Building Codes. EC Developments will obtain a Massachusetts licensed mechanical engineer to certify that the HVAC and dehumidification equipment complies with the state building codes.

The Greenfield area is known for its unique mix of industry and beautiful landscapes. EC Developments will honor the natural areas near its facility location by strictly adhering to green policies and environmentally friendly initiatives. This includes issues pertaining to electricity, water, and gas usage, in addition to noxious odors, toxins in the environment, and all other such negative environmental impacts. As a team composed of proud Massachusetts residents, EC Developments is personally vested in ensuring environmental policies are implemented to the fullest extent.

In this spirit, EC Developments will participate in clean energy programs, pursuant to M.G.L. c. 25, § 21, to reinvest in renewable energy and help protect the environment. As options to reduce environmental impact become more accessible and economically feasible, the company will continue to evolve day-to-day practices and adopt new technologies. EC Developments will also collaborate with city and Franklin County officials and industry experts to enhance its facility and achieve green certification.

(d) Energy-Efficient Facility Design and Facility Sanitation

EC Developments' facility will comply with the Massachusetts Building Code requirements (780 CMR), the national model standard for energy-efficient construction recognized by federal law and 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*. As such, EC Developments' retail facility interior design and layout will reduce the amount of energy used to regulate temperatures facility-wide, thereby significantly reducing adverse environmental impact. In addition, to reduce the need for harsh chemical cleaning supplies, antimicrobial building materials will be used in sanitary areas; this also mitigates groundwater contamination. Likewise, steam cleaning technology will be used for sanitization, as a sustainable alternative to chemical cleaners.

(e) LEED-Badge Certified Vendors

With locally based leadership, EC Developments is well-positioned and committed to environmentally conscious and sustainable design. EC Developments will minimize the environmental impact of its operations by selectively choosing locally available materials and local vendors, and implementing environmentally conscious practices throughout facility operations. EC Developments intends to hire from local, diverse vendors, including its contractors and suppliers, and will specifically seek out vendors who are LEED-accredited

engineers, architects, and construction professionals. Part of the vetting process for these vendors includes ensuring their use of best environmental practices and sustainable materials.

(f) **Curated Equipment and Supplies to Minimize Energy Use**

As further described below, EC Developments will curate equipment and supplies that minimize electricity usage.

2. **Lighting Cycles and Ballots to Reduce Electricity Use**

To reduce electricity demand during the day, EC Developments will schedule indoor lighting cycles during the night, thus eliminating excess energy usage for heating during the night hours and air conditioning during the day. This will serve to significantly reduce the adverse climate effect. EC Developments will also implement electronic ballasts for all lighting sources requiring a ballast, as electronic ballasts reduce electricity, heat, and air conditioning usage while increasing light output. When installing new electrical equipment, EC Developments will also use products certified with the Energy Star[®] seal, whenever feasible.

3. **Energy-Efficient HVAC Systems**

EC Developments will commit to only high-efficiency ductless split HVAC units and variable refrigerant flow HVAC units, or other more energy-efficient equipment.

At EC Developments' new facility, all rooms will be equipped with heating, ventilation, and air conditioning (HVAC) systems to maintain ideal environmental conditions for production. Each HVAC system will be equipped with HEPA filters, UV light, activated carbon (charcoal filters), a dehumidifier, humidifier, automated temperature controller, and carbon dioxide (CO₂) generator. Specifically, EC Developments will utilize the 24ANB7 Infinity 17 2-Stage or similar brand Air Conditioner with Puron refrigerant is one of the industry's energy-efficient systems, with up to 17.0 Seasonal Energy Efficiency Ratio (SEER) and a sound level that can reach as low as 67 decibels (dBA).

This system has been designed and manufactured to meet Energy Star[®] Criteria for energy efficiency when matched with the coil component EC Developments has outlined below. It is also an ISO 9001 Certified System, constructed in an ISO 9001 approved facility. As a company guarantee, the system will be rated in accordance with the latest edition of Air Conditioning, Heating, and Refrigeration Institute (AHRI) Standard 210; will be certified for capacity and efficiency, and listed in the latest AHRI director; will comply with the latest edition of American National Standards Institute/American Society of Heating, Refrigerating and Air-Conditioning Engineers (ANSI/ASHRAE) and with National Electric Code (NEC); will be constructed in accordance with UL standards, and will carry the UL label of approval; the unit's cabinet will be capable of withstanding Federal Test Method Standard No. 141 (Method 6061), 500-hr salt spray test; and the air-cooled condenser coils will be leak and pressure tested.

In addition to EC Developments' ducted system, it will also utilize the Carrier 38/40GRQ series or similar brand ductless split system. Uniquely, EC Developments' HVAC system will balance energy efficiency, quality-controlled environments, and cost efficiency. The fan coils of the systems will be mounted to the wall near the ceiling to provide maximum air circulation without overtaking floor space or obstructing windows. As an added measure of security, the units are connected by refrigerant piping and wiring, rather than ductwork, thus eliminating the risk of intruders entering through any ducts. In alignment with EC Developments' focus on environmentally friendly processes, this system allows individual rooms to be heated and cooled, rather than the entire facility at once. Because air is moved only into the space required, no energy is wasted in moving the air through ducts.

Further bolstering the energy efficiency of EC Developments' facility, EC Developments will also utilize the Carrier Premium Environmentally Sound Fan Coil with its HVAC systems, or similar brand. The FV4C is the premium air handler combining the proven technology of Carrier fan coils with environmentally sound Puron® refrigerant. This chlorine-free refrigerant is beneficial to the industry-leading system, as it provides 30-40% greater efficiency than standard heating and cooling systems. In addition to the outstanding efficiency of this model, the FV4C was designed with grooved tubing, louvered aluminum fins, and large face coils to provide superior efficiency in its performance. As an added safety measure, all system components are enveloped within a leak-free, thick, high-density insulation within a metal cabinet. EC Developments will utilize only the most superior in its technology and equipment, starting with its Carrier brand HVAC and sound fan coil systems.

As reflected above, EC Developments has sought to procure the best types of equipment that provide energy efficiency. EC Developments will continue its due diligence process in ensuring it procures equipment brands that meet its standards of energy efficiency and cost-effectiveness. Although these brands reflect EC Developments' model of environmental consciousness and quality production, should EC Developments find brands that provide greater efficiency and result in better quality products for Massachusetts customers, EC Developments will then utilize those brands.

4. Further Steps to Minimize Carbon Footprint and Environmental Impact

EC Developments will continue to adopt new technologies to reduce the environmental impact and electric demand (such as lighting schedules, active load management, and energy storage), while becoming more economically sustainable. This includes the use of paper and cardboard, and implementing recycling methods. The facility is expected to produce average levels of plastic, glass, and aluminum waste. EC Developments will properly utilize refuse containers for all combustible trash, including paper, pasteboard boxes, glass, and all other trash or discarded materials not containing plant matter. Similarly, EC Developments will properly utilize well-labelled refuse containers for designated recyclable materials, separate from solid waste

containers. EC Developments will provide recycling bins for assorted plastics, glass, aluminum, and paper products in all facilities. For ease-of-use by its employees, EC Developments will utilize color-coded cans specifically outlining where to dispose of a particular product. Specifying between landfill waste, paper waste, cans, and plastics will allow a great amount of refuse to be properly disposed of and recycled.



Image of easily recognizable color-coded disposal containers

EC Developments will engage with local waste management authorities to schedule recycling services and regular pick-ups. EC Developments will also ensure the implementation of proper resource disposal techniques for the removal of all regulated and toxic materials, including lamps, nutrient waste, and applicable electronics.

5. Recyclable Material Selection

EC Developments will use biodegradable and recyclable packaging for all storage, handling, and packaging needs. EC Developments will strive to reuse all internal packaging products for as long as those products remain functional, in an effort to reduce the consumption of unnecessary resources. Furthermore, EC Developments will take specific sanitation measures to elongate the lifespan of internal storage, labeling, and packaging products. All employees will also be trained in source-separation of any metals and packaging materials. EC Developments will engage with local waste management authorities to schedule recycling services and regular pick-ups.

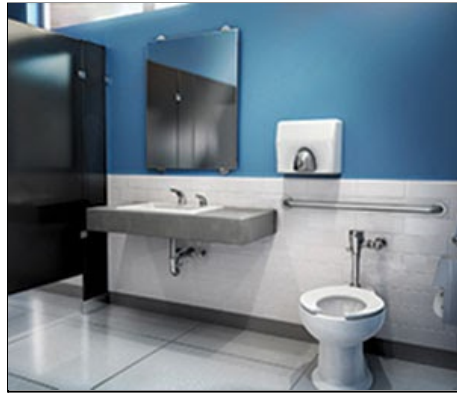
6. Paperless Communication

To reduce EC Developments' paper waste, email and other direct messaging services will be used as the primary channel of communication among management, employees, customer facilities, and vendors. EC Developments will use secure, cloud-based tracking systems to store electronic versions of all compliance-related forms and documents, allowing for mobile access in accordance with the CCC, and the reduction of paper.

7. Water Use and Plans to Minimize Water Consumption Facility-Wide

EC Developments has purposefully designed its facility and operations to strike the right balance between maximizing water and energy efficiency, and achieving the highest yield per plant.

Accordingly, plumbing will be constructed so that only sufficient quantities of water will be required. Therefore, low-flush, commercial grade toilets by such brands as TOTO or American Standard, or similarly cost-effective brands, will be installed in EC Developments' restrooms. To further reduce water and power consumption in bathrooms, EC Developments will install automatic sinks by MOEN and hand dryers by Dyson, or other equally efficient brands.



EC Developments will utilize automatic sinks, energy-efficient hand dryers, and low-flush, commercial grade toilets



EC Developments will also utilize Elkway (pictured here), or a similar cost-effective brand, water drinking fountains

Through its sensor technology, these water fountains are a unique way to minimize water waste and the use of plastic water bottles. These stations require minimal space and are integral to EC Developments' ADA-compliant facility design plan. The water bottle filler features its sanitary non-touch sensor activation with an automatic 20-second shut-off timer.

For maximum control and cost-efficiency, EC Developments will source its water from the municipality.

8. Conclusion

In the spirit of trust and transparency, EC Developments' dedicated team of operators, owners, and board members welcomes this opportunity to demonstrate their capacity to fully comply with all regulations set by the Cannabis Regulatory Commission (the Commission) by providing this plan for the Commission to determine that EC Developments is prepared to timely execute on the facility license.

EC Developments has provided a thoughtful plan that makes clear EC Developments' capacity and commitment to produce only the safest cannabis products. EC Developments' compliance-centric plan features pharmaceutical-grade practices and Standard Operating Procedures (SOPs) developed by professionals who leverage over 50 collective years of first-hand experience in the cannabis industry, consulting sector, and legal industry. In addition to being exceptionally well-qualified and highly respected professionals in their own right, each team member is also an outstanding citizen who has served this country and her or his communities. All of their personal and professional journeys not only prepared EC Developments to execute the robust plan detailed here, but also inspired their decisions to transition from successful careers to focus exclusively on improving life through cannabis.

QUALIFICATIONS AND TRAINING

1. Ensuring Ongoing Safety, Compliance, and Quality Through Onboarding and Ongoing Training of Employees

Each of EC Developments' departments will be managed by a highly qualified leader who will focus on instilling their staff with EC Developments' vision and values, as well as the skills and training required to ensure delivery of the highest quality service and products. These leaders will also be charged with maintaining and updating the policies, which will ensure that EC Developments' team members have the proper skills, as well as appropriate training and education. All employees, regardless of function, will receive comprehensive training prior to working in the facility and handling cannabis. Training programs will be tailored to the roles and responsibilities of the job function of each employee.

Consistent with its culture of compliance and best practices, EC Developments will maintain the *EC Developments Staffing and Training Manual* containing all applicable policies and procedures, which will be prepared in accordance with current regulatory requirements, be continuously improved, and made easily accessible both electronically and in paper form for inspection. The *EC Developments Staffing and Training Manual* will be housed in an electronic cloud-based portal, which will allow for immediate access of communication and application of new training and education. Also housed in the same portal will be a comprehensive curriculum of the following topics: Basic plant and product science, a pharmacology overview, state and local law FAQs, and quick reference guides (QRGs) concerning pain management.

EC Developments encourages personal growth, professional development, and employee empowerment. All team members are encouraged to provide input and suggest new policies and processes that empower learning, as well as provide feedback to optimize EC Developments' daily operations. In addition, each employee will have scheduled weekly touch-bases with management to allow a transparent exchange of constructive feedback.

(a) Employee Training Overview

All new team members will be required to undergo rigorous training, in accordance with the above-described *EC Developments Staffing and Training Manual*, and will further be advised of all employment policies, the life cycle of cannabis and its growth process, and the procedures applicable to specific job functions. Educational training will comprise written and e-learning presentations provided by management and other team leaders with relevant subject matter expertise. The presentations will be supplemented with hands-on training to demonstrate the material shared. Each team member will have a personalized training path tailored to her or his role, which will allow for internal growth and promotional development.

EC Developments proactively provides employees with progressive training and interactive

learning. This begins with providing orientation training for all new hires. No employee or consultant may work on-site before receiving new hire orientation training. The Chief Operating Officer (COO) will ensure each employee is provided all relevant and adequate training tailored to the roles and responsibilities of the job function of each employee, and at a minimum must include training on confidentiality, security controls, emergency response protocols, and regulatory compliance, as well as federal statutes regarding the use of cannabis. Each employee will receive a minimum of eight hours of ongoing compliance training annually or as deemed necessary by the COO, in addition to her or his prescribed learning and development path for promotion.

EC Developments will also ensure all retail employees are thoroughly trained to provide personal and thorough customer education. EC Developments strives to ensure that all customer education is effective and long-lasting. The company is committed to creating educational materials through a variety of formats to accommodate for each customer's specific learning style. Additionally, EC Developments believes that educating customers through several different formats promotes greater retention of information.

EC Developments supports the need for cannabis education and believes that its leadership team has a responsibility to provide proper education to the public and local healthcare professionals. Oftentimes, healthcare professionals lack access to quality education and research regarding cannabis, which prevents them from making informed recommendations for their customers. That is why EC Developments commits to providing ongoing research and education to local healthcare practitioners through workshops and other events. Its management team will work with local partners to educate physicians on its ongoing research into substance abuse and cannabis as a facilitator in recovery from addiction.

Upon entering the sales floor, each customer will be welcomed by an employee who will review the layout of the sales floor, the customer's needs, available cannabis products, risks and benefits of each product, proper use, storage, and disposal of products. Upon purchase of a product, the customer will also receive written documentation of specific instructions for the purchased product(s).

By educating customers, EC Developments encourages educated decision making and enhances safe and compliant use of cannabis products. This directly empowers customers, while also benefiting the community. EC Developments seeks to follow a well-structured plan to ethically promote its cannabis products, as well as provide standardized education on use of products, storage of products, disposal of products, and preventing misuse or abuse of products, in compliance with the Commission's regulations.

EC Developments will ensure that employees are trained on job specific duties prior to performing job functions, in compliance with 935 CMR 500.105(2). As provided by 935 CMR 500.105(2), once EC Developments is designated as a Responsible Vendor, all agents employed that are involved in the handling or sale of marijuana for adult use will successfully complete the Basic Core Curriculum within 90 days of hire. Agents will first take the Basic Core Curriculum, as provided by 935 CMR 500.105(2). After successful completion of the Basic Core Curriculum, each agent involve in the handling or sale of marijuana for adult use will fulfill the four-hour Responsible Vendor Training requirement every year thereafter so that EC Developments will maintain its designation as a Responsible Vendor, in compliance with 935 CMR 500.105(2). In addition to the Basic Core Curriculum, all agents acting as delivery employees of EC Developments, should it obtain a Delivery Endorsement from the Commonwealth, will have attended and successfully completed Delivery Core Curriculum, as prescribed by 935 CMR 500.105(2).

EC Developments will provide education materials available in commonly spoken languages designated by the Commission, which will include, but not be limited to, appropriate materials for the visually- and hearing-impaired. EC Developments will ensure that all educational materials will be available for inspection by the Commission on request. All retail employees and agents will be trained on the information included in the educational material, including:

1. A warning that Marijuana has not been analyzed or approved by the FDA, that there is limited information on side effects, that there may be health risks associated with using Marijuana, and that it should be kept away from children;
2. A warning that when under the influence of Marijuana, driving is prohibited by M.G.L. c. 90, § 24, and machinery should not be operated;
3. Information to assist in the selection of Marijuana, describing the potential differing effects of various strains of Marijuana, as well as various forms and routes of administration;
4. Materials offered to Consumers to enable them to track the strains used and their associated effects;
5. Information describing proper dosage and titration for different routes of administration. Emphasis shall be on using the smallest amount possible to achieve the desired effect. The impact of potency shall also be explained;
6. A discussion of tolerance, dependence, and withdrawal;
7. Facts regarding substance use disorder signs and symptoms, as well as referral information for substance use disorder treatment programs, and the telephone number for the Massachusetts Substance Use Helpline;
8. A statement that Consumers may not sell Marijuana to any other individual;
9. Information regarding penalties for possession or distribution of Marijuana in violation of Massachusetts law; and
10. Any other information required by the Commission.

(i) Administrative Matters

During the first day of training, an employee day-one manual will be issued to all employees. The manual will set forth EC Developments' policy regarding administrative matters, including terms of employment, what is expected of employees, and procedures for discipline. It will also include information on employee compensation and benefits. As a result, each employee must read and sign a statement acknowledging they have received, read, and understood EC Developments' policies, their compensation, and their eligible benefits.

(ii) Commencement of Onboarding

After all administrative matters are covered and acknowledged by each employee, EC Developments will begin its onboarding training. The company utilizes a robust onboarding training program covering various topics, such as new employee onboarding, mentoring, monthly departmental meetings, compliance, regulation and the law, safety training, security training, emergency and incident management, inventory management and diversion prevention, cannabis science, recordkeeping, product handling and sanitation, and recall handling. When deemed necessary, EC Developments will bring in third-party training consultants who will teach employees ongoing policy updates and other employment issues. In support, the COO will reassess all modules annually to determine if updated training is necessary to maintain a compliant operation.

(b) Responsible Vendor Training

In compliance with 935 CMR 500.105(2), EC Developments will provide a Responsible Vendor Program to all onboarding employees (within 90 days of hire) as well as eight hours of on-going training annually. The program will include all items required by 935 CMR 500.105(7), including:

- The effect of cannabis on the human body;
- Diversion prevention;
- Compliance with all tracking requirements
- Acceptable forms of identification
- State laws and rules affecting owners, manager, and employees (e.g. incident and notification requirements, waste disposal, sanctions, health and safety standards, etc.)

(c) Onboarding Training Program (45 hours)

EC Developments' robust *Agent Training Plan* ensures that all of its agents, prior to executing their role, understand the rules, laws, security measures, and operating procedures. The leadership of EC Developments is confident that its tried and true processes will ensure the business remains safe, secure, and compliant.

EC Developments' onboarding training program will take a minimum of 45 hours, broken down into the following categories.

(d) Standard Operating Procedures (SOPs) and Separation of Operations (4 hours)

During each department's onboarding program, agents will learn how SOPs help create a successful operation. EC Developments' Employee Handbook provides the basis for this training, as it is designed to acquaint agents with the company and provide information about – among other topics – SOPs, working conditions, policies affecting employment, requirements for agents' understanding of rules and laws, and retail facility security measures. Hands-on training specific to each position will also be provided by the manager-level employees (RM and QAM) – this type of training allows agents to conduct each relevant SOP in a controlled, supervised environment, ensuring agents can perform tasks before working at their positions.

Agents will receive education on the topic-specific items listed in the Employee Handbook through in-classroom education, quizzes, security training, and shadowing. As part of the shadowing process, agents will work with a supervisory level agent who will help them navigate “real world” examples of issues that may occur on a daily basis. Agents will also experience situations that textbooks and modules may not anticipate. Beyond training and shadowing, agents will be encouraged to ask ongoing questions about processes to ensure their responses to situations follow the methods outlined in the SOPs. Supervisors will help agents navigate their SOPs and Employee Handbooks to find the correct answer(s) to their questions so they can actively learn rather than passively accept an answer. If the number and type of questions warrant re-training, a supervisor may require an agent to re-take certain portions of the onboarding courses and training modules.

These SOPs will be updated as often as necessary to maintain compliance with all laws and regulations governing the company's operations. The Chief Executive Officer (CEO) and COO will work together to oversee the implementation of the SOPs into the company, while leaning on the expertise of its RM. Each department lead will work with the COO in the instance of any required revisions, additions, or amendments to the SOPs based on regulatory changes, as well as for any guidance or directives published by the Cannabis Control Commission (the Commission). These manager-level agents are responsible for drafting, updating, maintaining records of training, and adhering to SOPs in their areas of supervision. Should EC Developments modify any SOPs, agents will be re-trained as soon as possible. All records, including those related to employees' responsible vendor training program compliance, will be maintained for four years and made available for inspection by the Commission or any other applicable licensing authority upon request during normal business hours. *See* 935 CMR 500.105(2)(b).

(i) Retail-Specific SOPs (13 hours)

EC Developments understands the importance of providing a holistic approach to customer care,

down to the very methods used to market products, provide education, and warn against the negative effects of cannabis misuse. As such, EC Developments' Retail Operation SOPs and *Retail Facility Operations and Agent Training Plan* will detail methods for its retail facility operations, marketing and business processes, regulatory and compliance standards, employee training strategies, and tracking systems, while maintaining a customer-centric focus with safety and education as a core foundation.

EC Developments' leadership team understands that all factors that go into a well-regulated retail facility operation, such as inventory management, structural organization, marketing and product output, and employee training, cannot exist without safety education and the customers' best interests in mind. Thus, as outlined below, the *Retail Facility Operations and Agent Training Plan* will begin with EC Developments' company model of compliance and customer safety. It then outlines the decades-long combined experience of its core leadership team, including ownership and operation of cannabis companies and leading cannabis consultancies, and moves into a detailed breakdown of the robust educational materials EC Developments will provide to its customers. With this background in mind, the plan then steps through the "day-in-the-life" of a customer to showcase the operational steps of the retail facility from the viewpoint of a customer. This unique vantage point provides insights into the company's uncompromising values of customer service, product safety and consistency, implementation of its regulatory compliance, and ongoing cannabis research and development. Finally, this plan shifts into EC Developments' foundational guideposts that will be implemented in order to reach the stringent standards set for its company, including the organizational framework, staffing plan, and training methodologies.

(e) Cannabis Fundamentals (4 hours)

EC Developments understands that learning about cannabis provides all employees with a sense of responsibility to ensure its safe and sanitary retail. Thus, EC Developments will also provide onboarding training of the fundamentals of cannabis, including topics such as the biology and botany of cannabis, the endocannabinoid system, cannabinoids and terpenes, proper dosing protocols, proper genetic selection, seed germination, plant cloning, soil techniques, lighting options and photoperiod principals, watering and nutrient cycles, maximizing quality and yields, natural pest management and disease control, harvesting tools and techniques, drying and curing techniques, infusion techniques, extraction methodology, food safety and sanitation, cannabis chemistry, cannabinoid formulations, lab result interpretations, and much more. These topics will impart essential knowledge for all agents and employees of EC Developments, enabling them to better understand and answer any customer questions.

EC Developments will provide access to a "cannabis library" containing information regarding each of the above materials for on-the-job reading and training purposes. Such training and materials demonstrate that EC Developments seeks to truly invest in its employees' educational

growth.

(f) Safety and Security Equipment, and Protocols and Anti-Diversion Protocols (8 hours)

EC Developments has identified security protocols and will introduce anti-diversion policies and training programs to ensure the prevention of diversion. Company policies include strict control measures to prevent employee or third-party theft or loss. Supply chain security is designated as a primary job duty of all employees and managers, reinforcing a company-wide culture of responsibility. The Security Officer will be responsible for the development and implementation of all anti-diversion measures, including policy formation and annual training. The managers at the retail facility are responsible for plan oversight.

The safety and security of EC Developments' agents are its primary concern. Therefore, from onboarding through ongoing training, EC Developments' agents develop a thorough understanding of security measures and operating procedures within each operation. Agents will learn to support the security of the company through prevention, awareness, reporting, and responsible incident management. Each department's agents will learn their badge permissions and what it permits within each color-coded area of the facility.

EC Developments distributes cannabis products, which are controlled substances with many opportunities for diversion. Diversions include, but are not limited to, employee or third-party theft or transfer of cannabis products by an employee to an unqualified individual. Therefore, supply chain security is a top priority at EC Developments' facility and a primary job duty for all employees and managers. Best practice dictates that EC Developments demonstrates control and security over its controlled substance inventory.

An employee who is discovered to have a history of theft or diversion based on their background check will not be granted employment. EC Developments will not employ anyone who would come into contact with or handle cannabis who has been convicted of a felony of sale or possession of drugs, narcotics, or controlled substances.

Specific considerations regarding anti-diversion are contained throughout EC Developments' policies and include methods for data collection and employee accountability achieved through training and strict protocols for identifying, recording, and reporting diversion, theft, or loss. Access to each separate functional area is granted to an employee based on her or his experience, tenure, and level of responsibility.

Extensive training of employees will ensure that all staff are informed of security and anti-diversion measures, and properly trained to comply with all the policies and procedures. EC Developments' employees track all plant material from propagation to distribution as cannabis products. To accomplish this segment of training, agents will participate in an in-classroom

education session led by EC Developments' Security Officer. The Security Officer will provide education on topics, such as opening and closing procedures; the location of silent alarms; all areas of ingress and egress; fire emergency protocols; robbery and theft protocols; data security best practices; and the location of all emergency contacts, including phone numbers for the alarm company, surveillance company, fire department, police department, spill response team, poison control center, and the Commission.

From a safety perspective, it is important that employees are taught to follow basic hygienic protocols in order to prevent the spread of contagious diseases in the workplace. In order to create fully effective health and safety procedures, training must be provided through both initial employee training and followed by regular refresher courses. Any updates to protocols will be quickly and clearly communicated with additional training as necessary. Contagious disease prevention training will be provided to employees in the following areas:

- Sanitation of surfaces and equipment;
- Workplace and physical safety, including proper ventilation and SOPs for the use of cleaning materials;
- The wearing of masks and Personal Protective Equipment (PPE);
- Personal hygiene, including hand washing and laundry;
- Employee interactions when social distancing guidelines are implemented at the state or local level; and
- Proper signage in the facility.

The first step in any Site Safety Program is the development of Human Resources Policies and Procedures that result in the best qualified candidates being hired for the job.

(i) Emergency Preparation

The RM will post and maintain an emergency contact list in several areas of the facility. All retail employees will be properly trained in department-specific Incident Response. Material Safety Data Sheets (MSDS) for all chemicals used in the retail facility will be organized, accessible to all retail employees, and placed conspicuously and available for review by any employee or official visitor.

(ii) Fire Safety

Flammable materials will be stored in a fire locker and properly labeled for first responder identification. All areas of egress will be properly signed in accordance with National Fire Protection Association (NFPA) 704 standards. EC Developments' facility will comply with all local fire codes. Fire extinguishers will be maintained annually.

(iii) Personal Protective Equipment (PPE)

The RM will implement and maintain the PPE program. The program will be compliant with Occupational Safety and Health Administration (OSHA) and Environmental Protection Agency (EPA) guidelines and address:

- Hazards present;
- Selection, maintenance, and use of PPE;
- Training; and
- Monitoring.

Retail employees will be provided appropriate PPE and training, and will be trained in decontamination procedures. Employees are required to wear protective clothing and equipment as indicated by their department's safe work procedures. These procedures will specifically indicate when, where, and what types of equipment are to be worn. The RM will perform risk assessments of all activities. The assessment will evaluate the types of equipment and clothing that protect against damage to eyesight or hearing, dust or chemical inhalation or ingestion, skin or bodily exposure to caustic or toxic chemicals, and falling objects. Standard PPE required for all retail employees includes:

- Accessible eye wash stations with sufficient quantities of portable water;
- Uniforms with some level of fire resistance;
- Chemical-resistant gloves;
- Boots with water resistance and slip protection;
- N-95 or P-100 disposable respirators;
- A full-face air-purifying respirator with a minimum of a P-100 filter, fitted by a qualified professional (required for employees with beards and those performing substance spray applications); and
- Tyvek coveralls for employees performing substance spray applications.

(iv) Chemical Spill Response

All retail employees will be appropriately trained on spill response. Every employee is responsible for participating in spill response activities. A fully stocked spill kit will be maintained in the retail facilities. Areas with high spill risk will be stocked with a mobile spill kit for immediate mitigation.

(v) Workplace Safety

Site Operations Managers will include workplace safety training for new employees with annual updates. Employees will receive mandated annual Worker Protection Training. This general safety training will include a review of the following:

1. Personal accident reporting and investigations policies;
2. Fire prevention and response plans;
3. Respirator protection;

4. Federal worker protection;
5. Emergency evacuation plans;
6. Material handling and hazard communications policies, including maintenance of SDS;
7. PPE policies; and
8. Emergency contacts.

(f) Inventory Management and Recordkeeping (4 hours)

EC Developments will train agents on the importance of compliance with the Commission's rules regarding inventory management and recordkeeping. EC Developments' Chief Compliance Officer (CCO), COO, and Inventory Manager will train agents on the use of its inventory management (seed-to-sale or S2S) system. During this course, agents will learn to thoroughly detail cannabis and cannabis products throughout their life in the facility. This also includes reviewing products that are received using shipping manifests and the company's robust enterprise management system, thoroughly documenting product details in the inventory system, the safe and secure storage of cannabis and currency, and inventory audits.

(g) Inventory Tracking System (7 hours)

A S2S allows employees the ability to efficiently ensure the initial comprehensive inventory of all cannabis and cannabis products at the facility. The system will include the date the inventory count was taken; the product types and quantity; a summary of the inventory findings; and the name, signature, and title of the employee who conducted the inventory.

EC Developments will train its employees on the use of the company's point-of-sale (POS) system to thoroughly and accurately track inventory levels. A key feature of the POS system is the ability for EC Developments to easily set permissions for each user. For example, floor agents will not have access to edit or modify inventory levels, and any new shipments of cannabis will require management review and approval before being finalized in the system. Agents will be trained on their specific duty as well as the entire POS platform, including tracking dispensed cannabis products, registering a customer and inputting all required customer information, and inputting the kind and quantity of cannabis product sold. All employees will be thoroughly trained on customer transactions and logging the receipt of inventory within the system.

All retail agents will abide by EC Developments rules and regulations, as well as the Commission's, to ensure accurate system records. Employees will also be trained on labeling and receipt printing, customer interaction and all other pertinent product information.

In instances of recall and/or waste disposal, the employee overseeing quarantine and destruction can easily create a record within the system detailing any returned and/or waste cannabis

product; its destruction; the date of disposition; the company's name; the kind and quantity of cannabis product disposed of; and the method of disposal.

As part of its onboarding process, EC Developments will train its agents to effectively operate its inventory tracking system. Agents will first learn the system through written materials and the inventory tracking system's company-provided training, followed by in-person training on the systems with the department manager. All updates to the system, as well as ongoing refresher courses, will be provided regularly by the RM. An agent who fails to complete any critical training will be denied an agent identification card.

(h) Recall, Quarantine, and Destruction (3 hours)

EC Developments' QAM will provide all-agent training on the meticulous process in handling recalls, quarantines, and destruction of cannabis. The QAM will provide in-class training to educate agents on EC Developments' responsibility to quarantine and dispose of cannabis in a manner that protects the sanitation of the facility; maintains the security procedures; and provides traceability through documentation, reporting, and electronic tracking. Agents will learn to use the Waste Disposal Log to provide thorough documentation of the disposal process, including the number of products, date of disposal, method of disposal, and agent identification. Agents will go through mock recall drills to determine whether their performance of a withdrawal and recall procedure resulted in the proper identification and control of a batch of potentially affected product and whether the agents proficiently performed all steps in the process. After running through these drills, the QAM will determine if the agents are ready to graduate from this program and move on to the company's Employment Practices Training.

(i) EC Developments' Employment Practices (2 hours)

EC Developments is committed to the highest standards of business conduct. Therefore, all employees, officers, directors, and business partners must be committed to the company Code of Conduct (Code) while performing their jobs for the company. EC Developments values honest and ethical conduct and behavior. An employee should personally observe high standards of conduct so that the integrity of the company is preserved.

(i) Ethical Framework

The framework of this Code is based on ethics and EC Developments' deep regard for a culture of integrity. EC Developments commits to honest and ethical conduct; using good judgement; taking responsibility for any mistakes and ensuring that these are corrected or addressed; avoiding actual or potential conflicts of interest, as well as the appearance of conflicts of interest; full, fair, accurate, timely, and understandable financial disclosure in reports and documents; and compliance with any and all applicable laws, rules, and regulations.

(ii) Discipline

Failure to adhere to this Code may constitute grounds for disciplinary action for misconduct up to and including termination. Violations include failing to adhere to the provisions of the Code; failing to promptly report a suspected violation of the Code; encouraging another to commit a violation of the Code; retaliating against another employee for reporting a concern; and failing to implement the provisions of the Code according to one's role and responsibilities. In addition, any deviation from performance standards or internal policies may result in disciplinary action.

(iii) Employee Rights and Communications

Employee rights and labor relations is a key focus of EC Developments, particularly due to its leadership team's extensive experience in overseeing employees. EC Developments' Code in no way prohibits, limits, or restricts employees from exercising any rights provided by law, including, but not limited to, any activity that is protected under Section 7 of the National Labor Relations Act (NLRA). This includes, but is not limited to, the right of employees to speak with others about the terms and conditions of their employment, appropriately bargain where necessary, and engage in specific activities for the purpose of mutual aid and protection. Select employees appointed by the group will represent the majority in all bargaining and representation matters. EC Developments will not discriminate against any employee or potential employee in regards to membership status or potential membership status. Additionally, EC Developments will never interfere with the administration, or attempt to assist or control union activities, but will participate in collective bargaining with employee representatives in order to ensure the Act is being utilized appropriately for its intended purpose. EC Developments commits to protect and respect the privacy of its employees, clients, suppliers, and contractors. In addition, the company commits to compliance with all applicable privacy laws. Employees have the right to be free from retaliation and should receive support when taking any actions in furtherance of this Code's provisions.

(iv) Employer and Employee Responsibilities

Fair Employment Practices: EC Developments values a culture of diversity, inclusion, dignity, and respect, and commits to providing an environment free of discrimination, harassment, and retaliation. In addition, the company commits to complying with all applicable labor and employment rules and regulations at the federal, state, and municipal level. The company prohibits any unlawful behavior, including discrimination, harassment, or retaliatory conduct, on the part of its employees, officers, directors, or business partners.

Health and Safety: EC Developments commits to providing a safe and healthy workplace for all of its employees. The company will provide leadership and resources to employees in order to prevent hazards of any kind in the workplace. In addition, the company commits to engaging in practices that will contribute to the health and safety of the community in which the business operates.

Employees acknowledge that it is their responsibility to read, understand, and comply with the Code and to implement EC Developments' vision of an honest and ethical workplace with a culture of integrity. All employees have a responsibility to report potential violations of the Code in good faith. In addition, employees should communicate any relevant suggestions, including ways that processes may be improved; ethical issues that may be emerging and need to be included; and possible additions to the Code based on factors such as business development or organizational change.

(j) Demonstration of Knowledge and Training

As seen above, agent onboarding is an extensive and exhaustive program that ensures complete understanding of retail facility operating procedures. Company agents will undergo training regarding the Commission's regulations and all other applicable laws and regulations. After they complete each portion of EC Developments' Onboarding Training, agents will take an exam to demonstrate their understanding of the topics presented. No agent will be permitted to engage with cannabis or perform her or his job duties until she or he has passed this exam to the satisfaction of the manager leading the course.

If a staff member fails the exam, she or he will repeat the relevant module or do on-the-job training pertaining to the portions answered incorrectly. If job performance is unsatisfactory after foundational training, staff will be given additional training and instruction. If performance does not improve within 14 days, the staff member may be written up for poor job performance. All training will be completed through the company's Human Resources Information System (HRIS), which tracks staff training and exam results. The HRIS retains electronic records of all training and attendance records for at least three years, which will be available to the Commission upon request. Compliant to these records will include:

- The name of the person receiving the training;
- The date(s) of the training;
- A general description of the topics covered;
- The name of the person supervising the training; and
- The signatures of the person receiving the training and the individuals providing the training.

EC Developments will keep a copy of the certificates of completion for each employee's training on file and make them readily available for inspection. When a change of EC Developments' management occurs, the new manager will review the training record and sign it, indicating that the new manager understands its contents.

To maintain ongoing facility compliance after agents complete their Onboarding Training, managers will complete regular audits and reviews of agents. Agents are required to notify their

supervisor if they ever have a question, and the supervisor is required to provide an answer in a timely fashion.

Once recruitment assumes a regular pace, Onboarding Training will occur during the first week of each quarter. EC Developments will allow flexibility for part-time employees who cannot commit to 45 hours of training in a single week to complete the Onboarding Training over a two-week period. Onboarding Training will first be provided to directors, supervisors, and managers so they are equipped to train additional staff members. Onboarding Training will cover the material detailed below. An employee who fails to complete any critical training or violates the Act will be denied a position at the company.

(k) Continuing/Ongoing Education

(i) Education on the Local, State, and Federal Laws Surrounding Cannabis

In compliance with 935 CMR 500.105(2), all employees are required to maintain current knowledge of all applicable state and local laws, as well as documentation processes in accordance with the Commission. EC Developments understands that the legal landscape is ever-changing and broad in scope. EC Developments will ensure its agents learn and receive up-to-date education on laws, including, but not limited to, prohibitions of sales to minors, acceptable forms of identification, driving while under the influence, and cannabis use in public.

To provide ongoing understanding of the cannabis industry's dynamic regulatory landscape, the CEO, COO, and RM will host all-staff meetings at least once per month in order to review any changes to rules and laws affecting the cannabis industry, regulatory updates from the State, changes to rules from the surrounding localities, and updates to processes and procedures. Signs will be posted in the breakroom in a conspicuous location to remind agents of the upcoming meetings. To ensure awareness of significant modifications to rules and regulations, the department managers will provide quizzes to all staff members following the meeting. These quizzes will verify that staff members acknowledge and understand, and will thus, comply with the updated rules.

In order for all EC Developments staff to accurately produce unadulterated cannabis, they must also have a clear understanding of activities and conduct that would undermine this very objective. EC Developments will implement a policy that prohibits the conduct described here.

EC Developments will never:

1. Permit consumption of marijuana products on the property;
2. Operate or open unless a manager is on the premises and is directly supervising the activity within the facility. At all other times, EC Developments will be closed and properly secured;

3. Permit any person on its premises except its employees, qualified visitors, registered agents, or laboratory staff needing to collect marijuana samples for testing on its premises.
4. Permit the fraudulent use of a source of identification;
5. Allow access to any facility areas without proper identification;
6. Fail to designate with a sign all limited and restricted access areas;
7. Display signage that has not been approved by the Commission;
8. Employ a person under 21 years of age to dispense marijuana; or
9. Permit any agent or employee to participate in any of the above statements.

(ii) Ongoing Training and Refresher Courses

As seen above, the agent onboarding process is an extensive and exhaustive effort to ensure complete understanding of facility operating procedures. After training has been completed and the COO and department manager determine that the employee is sufficiently prepared to begin working within her or his operations, the employee will be permitted to work on-site. Employees will receive ongoing training in all new updates concerning cannabis. EC Developments will maintain an on-site training curriculum for employees to reference at any time.

However, EC Developments' training does not end here. All owners, managers, employees, and agents will be required, as a condition of employment, to participate in annual training on updates to the inventory tracking system, quarantine protocols, recordkeeping, etc. Agents will attend refresher courses and demonstrate their understanding of updates. To maintain ongoing facility compliance, managers will complete regular audits and reviews of agents. These reviews will be conducted through unannounced walk-throughs by a supervisor with an agent during her or his shift.

The purpose of this professional development stage is to provide continuing education and training to employees, as well as for enacting new procedures, changes in rules and regulations, and innovations in science and technology. EC Developments will evolve with the industry, embracing new technologies and processes that increase efficiency. The COO will coordinate with managers to oversee employees' professional development and where necessary, determine if a promotion, raise, demotion, or termination is warranted.

Every three months, department managers will evaluate employee performance. A written performance evaluation is performed annually. The results will be reported to the manager on duty. When necessary, the CEO, COO, and CFO will be consulted to decide if a promotion, raise, demotion, or termination is warranted. Re-training will be used as needed to address any deficient performance.

Hands-on instructional training is used to address any problems in technique or method. Memos

and updated policies and procedures will be used to communicate changes in regulations, SOPs, or business policies. Department meetings ensure all employees remain aware of operational changes. Third-party trainers and subject matter experts may be retained, as needed, for professional development activities. Each department will hold team meetings on a weekly basis. All EC Developments team members will meet quarterly, at least, as a group to address company-wide issues and events.

(iii) Post-Training Feedback

To maintain EC Developments' high standards of quality, efficiency, and compliance, the COO will evaluate the training program and employee results monthly. The COO will solicit and record feedback on the quality and efficacy of a training module from employees who received the training. Feedback will be solicited utilizing post-training group discussions, individual interviews, and anonymous surveys. Based on the results of this evaluation, the COO, in partnership with the managers, will implement any necessary changes and determine the need for re-training of staff.

EC Developments has planned a thorough onboarding and ongoing training process, and believes that implementation will procure the best, highest quality agents possible. EC Developments stands by its philosophy of compliance, which drives the educational processes open to all agents. Agents will have working knowledge of EC Developments' replicable, reliable SOPs. EC Developments is confident that it will sustain a safe, productive, and compliant work environment through its training company SOPs; safety and security equipment and protocol; inventory system training and management; recall, quarantine, and destruction; and employment protocols. Through its rigorous program comprising in-class training, question-and-answer sessions, quizzes, and performance evaluations, EC Developments is also confident its company will not only meet, but exceed all regulatory requirements surrounding agent training.

2. Anticipated Positions and Their Qualifications

In compliance with 935 CMR 500.105, EC Developments anticipates that it will hire the following positions:

Potential Company Positions

To discuss together at weekly meeting

Notes:

- You will not have to hire all of these positions at once
- You do not need to fill these positions now
- If you find an individual who has a special skill set, s/he may be a good match for a potential job, contingent upon licensure. That person will need to take a background check and be disclosed on the application if they're in a

management or principal officer position. However, filling some key positions here and there, may enable you to stand out on your application.

- The descriptive language is pulled from your narrative drafts that we are preparing

CCO-Chief Compliance Officer

Autonomous position reporting directly to the CEO. CCO ensures that protocols comply with the Commission and other regulatory agencies; drafts and monitors all compliance procedures; possesses excellent analytical skills, including the ability to comprehend complex legislation and anticipate its implications on operations; and has strong communication skills that sustain dialogue and relationships with the Commission's officials, law enforcement, landlords, city personnel, and management.

CEO-Chief Executive Officer

Direct experience managing a business, cannabis facility, or healthcare facility, preferably with a regulatory component; is analytically and socially intelligent; is able to take responsibility for EC Developments, while maintaining a solution-oriented, vision-based attitude; possesses legal and financial knowledge; is able to simultaneously focus on short-term and long-term goals; and possesses the ability to identify and respond to problems quickly and appropriately.

CFO-Chief Financial Officer

Manages the financial actions of the company; tracks cash flow; organizes financial planning; and analyzes the company's financial strengths and weaknesses, and proposes corrective actions accordingly.

COO-Chief Operating Officer

Continually reconciles and monitors cannabis inventory to maintain full compliance with the Commission's regulations; maintains communication with all state and local law enforcement and regulatory agencies to ensure consistent material compliance; possesses extensive knowledge of regulations and continual compliance training; and maintains relationships with local municipalities and enforcement.

Compliance Manager

Ensures that protocols comply with Commonwealth and other regulatory agencies; drafts and monitors all compliance procedures; performs inventory audits; possesses excellent analytical skills, including the ability to comprehend complex legislation and anticipate its implications on operations; and has strong communication skills that sustain dialogue and relationships with the Commonwealth officials, law enforcement, landlords, city personnel, and management.

Store Manager (1)

The Store Manager is the first point of contact for all store inquiries and responsibilities. The Store Manager holds essential responsibilities including but not limited to: customer service, order fulfillment, inventory control/reconciliation, cash management, daily sales reports, reporting and adjustments, creating and receiving manifests, creating and destroying packages, monitoring KPIs, and training staff members on all company SOPs and applicable state and local laws and regulations.

The Store Manager is responsible for creating and implementing staff schedules. The Store Manager keeps up to date with any company or state regulatory changes and adjusts store operations per company discretion. The Store Manager holds responsibility for compliance and works with the Compliance Team to quickly fix and maintain any compliance areas of improvement. The Store Manager assumes responsibility for loss prevention, identifies patterns or trends in inventory discrepancies, and reports losses to the Retail Management Team while implementing changes in staff, training, or inventory handling procedures. The Store Manager takes the lead in managerial decisions including: personnel issues, day-to-day operations, marketing, compliance, and general management of the store. In addition, the Store Manager is responsible for ensuring that the store is well stocked on all essential items including cannabis and non-cannabis products and works closely with the Retail Management Team to ensure par levels are maintained.

Assistant Store Manager (1)

The Assistant Store Manager acts as a direct line to the Store Manager and holds essential responsibilities: leading customer service, order fulfillment, inventory control and reconciliation, cash management, daily sales reports, adjustments, creating and receiving manifests into the state mandated reporting system, and training staff members. The Assistant Store Manager works with the Store Manager to uphold company SOPs and regulations. The Assistant Store Manager keeps up to date with any company or state regulatory changes and adjusts store operations per company discretion. The Assistant Manager reports directly to the Store Manager and assists in managerial decisions including personnel issues, day-to-day operations, marketing, and general management of the store. In conjunction with the Store Manager, the Assistant Store Manager is responsible for driving sales and great service while ensuring the store meets or exceeds company goals and objectives. The Assistant Manager assumes final decision-making authority and accountability for the store during the absence of the Store Manager and makes decisions based on current company and state operations, procedures, standards and laws.

Inventory Compliance Manager (1)

The Inventory Compliance Manager reports to the Store Manager and holds essential responsibilities in: regularly conducting inventory audits, training Inventory Associates regulations as well as company SOPs, inventory reconciliation, receiving incoming inventory in the company's POS system, creating and printing product tags, regularly reviewing par levels,

working in conjunction with the Purchasing Manager to order products as needed, and maintaining a high level of organization in back stock areas as well as on the sales floor. The Inventory Compliance Manager has extensive knowledge of the state inventory tracking system and all laws and regulations surrounding compliant inventory adjustments and reconciliation. The Inventory Compliance Manager assumes responsibility for tracking inventory and any missing inventory or unsolved discrepancies. The Inventory Compliance Manager supports the retail associates and eCommerce associates by maintaining a well-stocked sales floor and online order fulfillment area. The Inventory Compliance Manager assists in retail operations in the store as needed and is proficient in accurate cash-handling, compliantly selling cannabis products, customer service, and suggestive selling. This position is supervisory and requires a detail oriented and committed individual who has extensive inventory control skills.

Shift Lead (4)

The Shift Lead reports directly to the Assistant Store Manager and the Store Manager. The Shift Lead acts as the Manager on Duty and supervises the retail team while accurately performing daily operations when the Store Manager and Assistant Store Manager are absent. The Shift Lead works closely with the management team to ensure that company standards are consistently always met. The Shift Lead helps to effectively train new associates, and is the shining example of great customer service. The Shift Lead performs all retail associate responsibilities including: compliantly checking IDs, driving sales and current promotions, maintaining a clean and professional appearance, accurately using the POS system, and providing exemplary customer service. In addition, the Shift Lead assists the management team with: inventory control, receiving manifests, managing breaks, updating POS inventory, cash management, running promotions, and executing opening and closing procedures including: counting drawers, dropping cash deposits, making change, and securing the facility at close. The Shift Lead is responsible for staying up to date on current regulations and effectively relaying information to team members per management direction. This position is supervisory and requires a passionate and flexible team leader who can follow and train on management directives with ease.

Retail Associate (10)

The Retail Associate is primarily responsible for the accurate and compliant selling of various cannabis products whilst upholding the company's high customer service standards. The Retail Associate is very familiar with a wide variety of products and has a well-rounded understanding of the effects of different cannabinoids. The Retail Associate is responsible for suggestive selling and promoting products, as well as keeping up to date with all regulations surrounding the selling of cannabis products. The Retail Associate provides exemplary customer service and is comfortable engaging with customers in a fast, friendly, and efficient manner. In addition, the Retail Associate holds responsibility in: maintaining a clean storefront, alerting management of any inventory issues, maintaining a clean and professional appearance, accurately labeling products, answering phone calls and emails, compliantly checking IDs, accurately using the

Point of Sale system, diligently checking labels, upholding SOPs, accurate cash-handling, performing applicable opening and closing duties, and signing up new customers for our rewards program. This role is non-supervisory and requires a passionate and flexible team player.

Security Officer

The Security Officer reports to the Store Manager and holds essential responsibilities including: conducting regular safety walkthroughs of all licensed and unlicensed premises, regularly reviewing camera footage during operational and non-operational hours, reporting any security threats to the management team immediately and local law enforcement as necessary, maintaining safe firearm-handling procedures, and completing shift logs, investigation status notes, and incident reports. The Security officer maintains knowledge on all state/local rules and regulations regarding armed security in the cannabis industry. The Security Officer thoroughly documents operations and activities throughout the properties. The Security Officer is responsible for controlling the customer access to employees, products, assets, and limited access areas. The Security Officer accepts performance feedback in a professional manner and adjusts operations as directed. The Security Officer assumes responsibility for monitoring authorized guests, vendors, and contractors. The Security Officer maintains the privilege of carrying a firearm with all local and state authorities. The Security Officer may be required to perform the duties of the Brand Ambassador and should be proficient in: compliantly checking IDs, organizing queues, and answering phone calls. This position is non-supervisory and requires a cool-headed individual who can make fast and appropriate safety decisions.

PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS

EC Development's Human Resources Manager (HRM) will pre-screen candidates by stating clearly to potential applicants what items and prerequisites will be needed to properly qualify the employment application. Any applicant who has submitted a complete application for employment will have a professional background check conducted. This investigation will be in addition to verification that the potential agent is, or will soon be, licensed as a cannabis agent or employee, and therefore, allowed to work in the facility. The investigation will be conducted to ensure the potential agent does not have any convictions or records that would bar them from employment. The investigation will also check for any crimes of tax fraud or evasion, theft, or moral turpitude, whether misdemeanors or felony. Any indication of past crimes of moral turpitude will be a bar to employment. Potential employees will be denied employment as a result of certain felony charges, theft, embezzlement, certain drug and paraphernalia charges, and any other convictions that restrict employment as designated by the Cannabis Control Commission (the Commission).

The following searches may be performed, depending upon the type of position the candidate is seeking:

(1) Member-Contributory Theft Information Database

EC Developments will use a member-based program where companies share agent theft and shoplifting information to identify applicants with a history of internal theft. The database is built from member contributions and will be available exclusively to member organizations. Member contributions are typically proprietary records and not found through traditional public record sources;

(2) National Crime File Search

Some vendors can offer access to a nationwide database of criminal records gathered from across all 50 states. A variety of sources is utilized, including Sex Offender Registries, state and county criminal courts, and state-level departments of corrections. This search can provide instant results, depending on the provider;

(3) Felony and Misdemeanor Search

This county courthouse search includes a search of all felonies and misdemeanors on all indexes available at the main county seat court location; and

(4) Motor Vehicle Report

A Motor Vehicle Report (MVR) reveals the status of an applicant's driver's license and any violation history. This search should be conducted on all candidates who will have driving

responsibilities, including those who will not only drive a company vehicle, but who may also drive a personal vehicle on company time or for business purposes.

EC Developments' HRM will utilize the following verification and qualification solutions, depending on the level of security required for the position:

(1) Social Security Number Verification (SSNV)

This search matches the input information against millions of consumer header credit files contained in the databases of nationwide credit reporting agencies. The SSNV returns other names and addresses associated with the identifying information used to request the report;

(2) Employment and Education Verification

EC Developments will integrate instant and automated employment screening products into the hiring process. Instant searches will be used to efficiently move forward in the hiring process by quickly confirming or validating basic information such as Social Security number or name and address history. Automated searches will provide electronic delivery of process updates and results, eliminating time delays often associated with manual follow-up on important screening components such as employment or education verifications. Following a successful first interview, EC Developments will initiate a background check. Once the candidate has passed a background check, subsequent interviews will be conducted, depending on the position;

(3) Adjudication and Alerts

EC Developments will provide a criminal records adjudication policy as part of the screening process. Fair Credit Reporting Act (FCRA) mandated Adverse Action letters for candidates that fail to meet specific screening criteria set forth by the organization will be delivered to candidates;

(4) Drug Screening

EC Developments will utilize a drug testing service provider who will track results, provide reports, and ensure the company stays in compliance with the Commission and State regulations. The HRM will develop and update drug testing policies. A basic DOT Five Panel Drug Test (urine conventional) will be utilized. Cannabis use by a qualified patient is not a disqualification for employment. The following drugs will be tested from the applicant's urine sample: Amphetamines (amphetamine and methamphetamine), benzoylecgonine (cocaine metabolite), cannabinoids (cannabis metabolite and THC-COOH), opiates (codeine and morphine), and phencyclidine (PCP). The HRM will cause all required criminal and drug screens to be updated every two years. All agents are required to notify the company whenever they have any encounter with law enforcement. The HRM will determine if an additional background screening

should be performed upon the agent's notice. A post-accident drug screening may be performed at the HRM's discretion or if required for worker's' compensation purposes;

(5) First Interview

The first interview will comprise a face-to-face meeting with the manager of the division in which the applicant is interviewing for a position. No more than five applicants will be selected for a first interview. The purpose of this interview will be to help determine the applicant's level of knowledge regarding cannabis operations; existing skill-set relevant to the duties of the job offered; the applicant's capacity to learn new skills and grasp concepts (specifically regulatory concepts); and the potential to commit theft or fraud. At least two references will be contacted and details of the interview confirmed. A solid background (or an appropriate level of education/experience relating to the position offered), a clean record, and indicia of honesty will be requisites for the second interview; and

(6) Final Interview

The final interview will be conducted by the GM. No more than three candidates will be selected for the final interview. The GM will ask a variety of questions intended to assess the applicant's ability to interact with others and work according to EC Developments' policies. The final decision will be made by the GM with input from the manager who conducted the first interview and the HRM. For management positions, the HRM and a retail manager will jointly conduct the final interview after consulting with managing members. All potential agents must go through the entire process. Each new hire will begin work on a three month probationary period of employment. At the end of the three months, the new hire's division manager will conduct an assessment of the agent's performance.

As stated above, EC Developments is committed to being an equal opportunity employer that hires individuals who are most qualified for the desired position regardless of race; height or weight; credit rating or economic status; religious affiliation or beliefs; citizenship; marital status or number of children; gender; sexual orientation; arrest or conviction; security/background checks for certain religious or ethnic groups; disability; or medical questions and examinations. Through its AA Plan, EC Developments' HRM and CDO will ensure individuals from all backgrounds are given equal opportunity for employment. EC Developments will utilize the Commission's retrospective study to ensure its compliance with the ideals of the Commission in its diverse hiring practices, prohibition of discrimination based on race, gender, and ongoing training. By example, EC Developments will ensure its job postings are located in a single conspicuous place where employees are trained to look for important announcements and information. Further, jobs will be posted for 14 days, at minimum, to provide ample time for respondents. As is provided, EC Developments will seek to promote from its internal staff when possible so as to provide meaningful advancement opportunities for its employees.

The HRM and CDO will utilize state and federal laws and executive orders to guide policies and procedures as well as follow the EEO and Supplier Diversity Program set in place. Internal audits will be performed at least yearly to determine if the AAP, EEO, and Diversity Program are effective and are being used appropriately. All agents will be educated on these policies and procedures in order to promote a workplace committed to equity in the workplace as well as to keep the company accountable for all actions.

As part of the EEO, all qualified individuals will be given a fair opportunity to interview for a position at EC Developments as well as a fair opportunity to move laterally or be promoted. All employment opportunities will be posted internally before externally to give current employees an opportunity for promotion. These vacancies will be posted in locations that are prominently visible and equally available for all employees to access so as not to exclude any employee from the opportunity.

1. Personnel Policies Regarding Written Operating Procedures and Recordkeeping

In compliance with 935 CMR 500.105(9), staffing plans and staffing records of EC Developments will be made available for inspection by the Commission, upon request. The records of the establishment will be maintained in accordance with generally accepted accounting principles (GAAP). Written records that are required and are subject to inspection include, but are not necessarily limited to, all records required in any section of 935 CMR 500.000, in addition to the following:

- (a) Written operating procedures as required by 935 CMR 500.105(1);
- (b) Inventory records as required by 935 CMR 500.105(8);
- (c) Seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105(8)(e);
- (d) The following personnel records:
 - (i) Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
 - (ii) 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:
 - (1) all materials submitted to the Commission pursuant to 935 CMR 500.030(2);
 - (2) documentation of verification of references;
 - (3) the job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision
 - (4) 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;
- (5) documentation of periodic performance evaluations;
- (6) A record of any disciplinary action taken; and
- (7) Notice of completed responsible vendor and equigh-hour related duty training.
- (iii) A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
- (iv) Personnel policies and procedures; and
- (v) All background check reports obtained in accordance with 935 CMR 500.030.
- (e) Business records, which shall include manual or computerized records of:
 - (i) Assets and liabilities;
 - (ii) Monetary transactions;
 - (iii) Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
 - (iv) Sales records including the quantity, form, and cost of marijuana products; and
 - (v) Salary and wages paid to each employee, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the nonprofit corporation, if any.
- (f) Waste Disposal records as required under 935 CMR 500.105(12); and
- (g) Following closure of EC Developments, all records will be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission

In compliance with 935 CMR 500.105(1), EC Developments shall have and follow a set of detailed written operating procedures. If the establishment has a second location, it shall develop and follow a set of such operating procedures for that facility. Operating procedures shall include, but need not be limited to the following:

- (a) Security measures in compliance with 935 CMR 500.110;
- (b) Employee security policies, including personal safety and crime prevention techniques;
- (c) A description of the Marijuana Establishment's hours of operation and after-hours contact information, which shall be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
- (d) Storage of marijuana in compliance with 935 CMR 500.105(11);
- (e) Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold;
- (f) Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);
- (g) Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;

- (h) A staffing plan and staffing records in compliance with 935 CMR 500.105(9);
- (i) Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
- (j) Alcohol-free, smoke-free, and drug-free workplace policies, 935 CMR 500.105(1);
- (k) A plan describing how confidential information will be maintained;
- (l) A policy for the immediate dismissal of any marijuana establishment agent who has:
 - (i) Diverted marijuana, which shall be reported to law enforcement officials and to the Commission;
 - (ii) Engaged in unsafe practices with regard to operation of the Marijuana Establishment, which shall be reported to the Commission; or
 - (iii) Been convicted or entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.
- (m) A list of all board members and executives of EC Developments, and members, if any, of the licensee must be made available upon request by any individual. 935 CMR 500.105(1)(m) requirement may be fulfilled by placing this information on the Marijuana Establishment's website.
- (n) Policies and procedures for the handling of cash on Marijuana Establishment premises including but not limited to storage, collection frequency, and transport to financial institution(s).
- (o) Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.
- (p) Policies and procedures for energy efficiency and conservation that shall include:
 - (i) Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;
 - (ii) Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on the site, and an explanation of why the identified opportunities were not pursued, if applicable;
 - (iii) Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
 - (iv) Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants.

In compliance with 935 CMR 500.105(1), all confidential information will be maintained in a secure location, kept separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or

pursuant to an order from a court of competent jurisdiction. All confidential information will be made available to the Commission as requested by it.

RESTRICTING ACCESS TO AGE 21 AND OLDER

EC Developments' Security Officer (SO) will ensure the ongoing safety of employees and authorized visitors by implementing the following security protocols. When a visitor arrives, she or he will first enter a secured entry room which prevents further access to non-authorized areas by means of a commercial grade steel door, which is kept locked. This small area enables registered retail facility employees to verify the person's credentials, as described below, and inquire about the reason for the visit. A sign will be conspicuously posted on every entrance that reads:

**THESE PREMISES ARE UNDER 24/7 VIDEO SURVEILLANCE.
ONLY AUTHORIZED VISITORS ARE PERMITTED TO ENTER**

For purposes of this section, a visitor is anyone who is permitted to be on the premises, but is not an employee. Visitors include guests, members of the Cannabis Control Commission (the Commission), other regulators, law enforcement officials, and short-term contract workers (such as a plumber to repair a leak or technician to install internet access for the tracking system). When an approved vendor or visitor arrives at the retail facility, the SO or agent will greet the visitor, establish eye contact, verify the visitor is expected and has the appropriate approval, and ask the visitor to provide a valid photo identification and scan or copy it (regulatory agency representatives and law enforcement officers will be asked to show an official identification card). The SO or agent will verify the visitor's identification is compliant, either as a motor vehicle operator's (driver's) license; registration certificate issued under the Military Selective Service Act; an identification card issued to a member of the Armed Forces; or another document issued by a federal, state, county, or municipal government; and permit the individual to enter the facility. Visitors without valid government ID will not be admitted to the facility. This will enable EC Developments to ensure that all consumers entering the facility are at least 21 years of age or older, in compliance with 935 CMR 050(5). Further, all employees and registered agents must be 21 years of age or older, in compliance with 935 CMR 500.030. The individual will be issued a visitor badge and direct them to wear the badge in a conspicuous place so it remains visible at all times. The SO or agent will explain that the badge is property of the company and must be returned before leaving. The SO or agent will use a communication device such as a walkie-talkie, to call the manager in charge to escort and monitor the visitor at all times in the facility. Finally, the SO or agent will request that the individual sign and date the EC Developments Visitor Log.

The Visitor Log will include the following information:

- Name;
- Company name;
- Purpose of visit;

- Badge number assigned;
- Date of visit;
- Time in and Time out;
- Areas of facility that were visited; and
- Name of each employee who was visited.

Visitors will be required to sign in and out on a paper form as follows:

VISITOR LOG <i>Facility access by anyone other than badged employees must be documented. Visitors must visibly display a visitor badge at all times and fill out columns 1 - 11 below.</i>											
Date	Assigned Visitor Badge ID #	Visitor First and Last Name (print)	Company Name	Visitor Signature	Purpose for Visit	ID State & Number	Time In	Time Out	Facility Areas visited	Name(s) of Employees Visited	Escort Initials

Image depicting EC Developments' sample visitor log

The SO will transfer this information into EC Development's digital catalog to ensure the ongoing monitoring of visits. The Chief Compliance Officer (CCO) is ultimately responsible for ensuring that the visitor log is stored as a part of EC Developments' Record Keeping system. The company will maintain visitor logs and copies of government-issued IDs in the facility's secure records room for a period of three years; upon the request of the Commission, the NJSCI, or local law enforcement if appropriate, EC Developments will provide the visitor log for inspection. The SO or employee will also make a photocopy of each visitor's government-issued ID and retain it with the log. If an individual is found using fake, forged, or fabricated identification, the SO will immediately scan the information for company files, notify the police, and report the minor to his/her parent(s) or legal guardian(s).

All visitors will clearly display on their clothing a visitor badge throughout their visit to EC Developments' facility. The visitor badge is attached to a lanyard that can be worn around the neck. The badge itself contains the visitor's name and company name, plus the word "VISITOR" on the badge. For example, construction workers who need to enter the premises to complete a

repair will receive an ID from EC Developments which will be worn at all times. No visitor who is given access to the retail facility will be left unsupervised while on the premises. The SO or manager in charge will be required to monitor and accompany the visitor(s) during their entire time in the facility. All employees will be trained to not only observe the actions of visitors to prevent product diversion, but will also to monitor closely to encourage visitors not to touch any cannabis plants or products to avoid contamination.

For the safety of all individuals at the facility, photography or video recording by employees or visitors within any part of the facility is strictly prohibited. Any person who is caught taking photos or videos will be asked to delete them immediately. Employees or visitors who repeatedly ignore this rule will be asked not to return.

DIVERSITY PLAN

EC Developments has identified 6 segments of diverse populations: (1) women; (2) minorities; (3) veterans; (4) persons with disabilities; and (5) LGBTQ+.

When analyzing this breakdown against local demographics, EC Developments has identified the following Diversity Plan Goals:

- Hiring of staff that ensures a 10% minimum hiring of women;
- Hiring of staff that ensures a 10% minimum hiring of minorities;
- Hiring of staff that ensures a 5% minimum hiring of individuals with disabilities;
- Hiring of staff that ensures a 5% minimum hiring of individuals that identify as LGBTQ+;
- Hiring of staff that ensures a 10% minimum hiring of military veterans; and
- Ensuring that a minimum of 15% of third-party ancillary businesses used by EC Developments to support its operations, are women-owned, minority-owned, individuals with disabilities-owned, LGBTQ+-owned, and veteran-owned, according to the Massachusetts Supplier Diversity Office, broken down as follows:
 - At minimum, 5% women-owned businesses;
 - At minimum, 2% veteran-owned businesses;
 - At minimum, 5% minority-owned businesses;
 - At minimum, 2% LGBTQ+-owned businesses; and
 - At minimum, 1% persons with disabilities-owned businesses.

To meet these goals, EC Developments has established the following milestones and programs:

- EC Developments will recruit diverse employee candidates from local job fairs and job boards. EC Developments will also post to and recruit from job boards such as MPNDiversityJobs.com, ThePartnershipInc.org, Diversity-Jobs.com, and MassachusettsDiversity.com. Its advertisement will explicitly state that it is looking for women, minorities, and persons with disabilities to work for the establishment.
- EC Developments will also utilize the Operational Services Division of the Supplier Diversity Office of Massachusetts (OSD) (sdo.osd.state.ma.us) to send out requests for proposals (RFPs) to minority, women, disabled, and veteran business enterprises within its first year of operation for support in its buildout. Thereafter, EC Developments expects to utilize this portal at least once a year, depending on the need of the company for third-party business support.
- EC Developments will promote the opening of positions through local job fairs and job boards. The company will attend local job fairs at least one time per year.
- EC Developments will train management through its onboarding process, ensuring that all company hiring is nondiscriminatory and inclusive.

- As part of its goals, EC Developments will ensure that all applicants have a fair opportunity to be considered for employment, and that all hired agents feel represented in their work environment and are not being discriminated against. *See* 935 CMR 500.101(1)(c)(k).

EC Developments will work towards each of its milestones through the following measurements:

- EC Development's Human Resources Manager (HRM) will administer and document all diversity and recruitment initiatives, including ensuring the thorough documentation of its diversity plan.
- The HRM will review all documentation each quarter to measure outcomes and the milestones met or unmet. This review will also measure the steps taken toward each measure so that EC Developments can improve its processes. The HRM will document the jobs listed as available; where the opportunities are advertised (e.g. the websites, recruitment boards, etc.); the number and demographics the individuals target through the recruitment vehicles used; the number and demographics of individuals who submitted resumes, were interviewed, and were hired. Through this documentation process, the HRM will have all counts of the number of individuals hired who are women, minorities, individuals with disabilities, veterans, and other diverse groups. This will be assessed from the total number of individuals hired to ensure at least 10% minorities, women, and disabled individuals, and 10% veterans are hired.
- The HRM will work with local job fair organizations to ensure yearly participation in these fairs. The HRM, in coordination with the CIA Team, will document the number of job fairs in which the company has participated, the targeted demographics who have engaged with the company at the fair, resumes received, resulting interviews, and hiring.
- The HRM will document all responses received through EC Developments Requests for Proposals provided to the OSD, including the type minority status of the companies, their responses, and the companies hired for the product/service requested. It will be measured against all services and products purchased by EC Developments, to work toward at least 5% women-owned businesses; 2% veteran-owned businesses; 5% minority-owned businesses; 2% LGBTQ+-owned businesses; and 1% persons with disabilities-owned businesses.
- In an effort to prevent discriminative occurrences and to foster a workplace of collaboration, EC Developments' HRM will proactively educate all employees, including management, on discrimination issues, the reporting process, and corrective actions. This plan is comprised of trainings, including, but not limited to, family responsibilities training, anti-discrimination, sexual harassment training, and anti-harassment onboarding and yearly training sessions for all employees.
- EC Developments 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.

- Any actions taken, or programs instituted, by the applicant will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

EC Developments will utilize the above Diversity Plan upon notice of award of a provisional license, and will continue assessing its plan throughout the year to work towards its goals. The Progress and success of this plan will be thoroughly documented, evaluated, and reviewed annually from provisional licensure, upon license renewal and each year thereafter. The Plan will account for demonstration of proof of progress and success upon its yearly license renewal.