



## Massachusetts Cannabis Control Commission

### Marijuana Retailer

#### General Information:

License Number: MR283126  
Original Issued Date: 08/16/2022  
Issued Date: 08/16/2022  
Expiration Date: 08/16/2023

### ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Holistic Health Group Inc

Phone Number: 774-419-3888 Email Address: tmcnamara@holistichealthgroup.org

Business Address 1: 477 Wareham Street

Business Address 2:

Business City: Middleboro Business State: MA

Business Zip Code: 02346

Mailing Address 1: 477 Wareham St

Mailing Address 2:

Mailing City: Middleboro Mailing State: MA

Mailing Zip Code: 02346

### CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

### PRIORITY APPLICANT

Priority Applicant: yes

Priority Applicant Type: RMD Priority

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number: rpa201867

### RMD INFORMATION

Name of RMD: Holistic Health Group Inc.

Department of Public Health RMD Registration Number: RMD1566

Operational and Registration Status: Obtained Final Certificate of Registration, but is not open for business in Massachusetts

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

If no, describe the circumstances below:

### PERSONS WITH DIRECT OR INDIRECT AUTHORITY

#### Person with Direct or Indirect Authority 1

Percentage Of Ownership: Percentage Of Control:

Role: Executive / Officer Other Role:

First Name: Tim Last Name: McNamara 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:

#### Person with Direct or Indirect Authority 2

Percentage Of Ownership: 100

Percentage Of Control: 100

Role: Owner / Partner

Other Role: Executive / Officer

First Name: Paul

Last Name: Ofria

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:

#### Person with Direct or Indirect Authority 3

Percentage Of Ownership:

Percentage Of Control:

Role: Board Member

Other Role:

First Name: Kenneth

Last Name: Ofria

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

#### Entity with Direct or Indirect Authority 1

Percentage of Control:

Percentage of Ownership:

Entity Legal Name: Frankie Investments, LLC

Entity DBA:

DBA

City:

Entity Description: Landlord for License Location

Foreign Subsidiary Narrative:

Entity Phone: 508-435-7332

Entity Email:

frankieinvestmentgroup@gmail.com

Entity Website:

Entity Address 1: 202 Wood Street

Entity Address 2:

Entity City: Hopkinton

Entity State: MA

Entity Zip Code: 01748

Entity Mailing Address 1: PO Box 763

Entity Mailing Address 2:

Entity Mailing City: Hopkinton

Entity Mailing State: MA

Entity Mailing Zip Code:

01748

Relationship Description: Frankie Investments, LLC is both the sole investment entity and the landlord for the applicant, Holistic Health Group, Inc. at its location in Middleborough.

### CLOSE ASSOCIATES AND MEMBERS

No records found

### CAPITAL RESOURCES - INDIVIDUALS

No records found

### CAPITAL RESOURCES - ENTITIES

#### Entity Contributing Capital 1

Entity Legal Name: Frankie Investments LLC

Entity DBA:

Email:

frankieinvestmentgroup@gmail.com

Phone:

508-435-7332

Address 1: 202 Wood st.

Address 2:

Date generated: 09/01/2022

Page: 2 of 6



City: Hopkinton	State: MA	Zip Code: 01748	
Types of Capital: Debt	Other Type of Capital:	Total Value of Capital Provided: \$1200000	Percentage of Initial Capital: 100
Capital Attestation: Yes			

#### BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

#### DISCLOSURE OF INDIVIDUAL INTERESTS

##### Individual 1

First Name: Tim	Last Name: McNamara	Suffix:
Marijuana Establishment Name: Holistic Health Group	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Middleborough	Marijuana Establishment State: MA	

##### Individual 2

First Name: Paul	Last Name: Ofria	Suffix:
Marijuana Establishment Name: Holistic Health Group	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Middleborough	Marijuana Establishment State: MA	

##### Individual 3

First Name: Kenneth	Last Name: Ofria	Suffix:
Marijuana Establishment Name: Holistic Health Group	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Middleborough	Marijuana Establishment State: MA	

#### MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 477 Wareham st	
Establishment Address 2:	
Establishment City: Middleborough	Establishment Zip Code: 02346
Approximate square footage of the establishment: 1500	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
Community Outreach Meeting Documentation	Community Outreach Documentation.pdf	pdf	5e534bf14fa2b004756a3b9b	02/23/2020
Certification of Host Community Agreement	Single page certification of HCA.pdf	pdf	625eed025e562200082792a9	04/19/2022
Plan to Remain Compliant with Local Zoning	Plan to remain compliant with local zoning.pdf	pdf	625eed653eefeb000a32950f	04/19/2022

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

#### PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
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Date generated: 09/01/2022



## ADDITIONAL INFORMATION NOTIFICATION

**Notification:** I understand

## INDIVIDUAL BACKGROUND INFORMATION

### Individual Background Information 1

**Role:** Owner / Partner      **Other Role:** Executive / Officer  
**First Name:** Tim      **Last Name:** McNamara    **Suffix:**  
**RMD Association:** RMD Manager  
**Background Question:** yes

### Individual Background Information 2

**Role:** Owner / Partner      **Other Role:** Executive / Officer  
**First Name:** Paul      **Last Name:** Ofria    **Suffix:**  
**RMD Association:** RMD Owner  
**Background Question:** no

### Individual Background Information 3

**Role:** Board Member      **Other Role:**  
**First Name:** Kenneth      **Last Name:** Ofria    **Suffix:**  
**RMD Association:** RMD Manager  
**Background Question:** no

## ENTITY BACKGROUND CHECK INFORMATION

### Entity Background Check Information 1

**Role:** Investor/Contributor      **Other Role:**  
**Entity Legal Name:** Frankie Investments LLC      **Entity DBA:**  
**Entity Description:** Investments company  
**Phone:** 508-435-7332      **Email:** frankieinvestmentsgroup@gmail.com  
**Primary Business Address 1:** 202 Wood st      **Primary Business Address 2:**  
**Primary Business City:** Hopkinton      **Primary Business State:** MA      **Principal Business Zip Code:** 01748  
**Additional Information:**

## MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Bylaws	Signed bylaws.pdf	pdf	6228e4c62882b60773c1da67	03/09/2022
Secretary of Commonwealth - Certificate of Good Standing	DUI Certificate of Good Standing.pdf	pdf	625ef7583eefeb000a32adab	04/19/2022
Articles of Organization	Articles.pdf	pdf	625f01525e5622000827d3c0	04/19/2022
Secretary of Commonwealth - Certificate of Good Standing	Certificate of good standing - Commonwealth.pdf	pdf	626813e14d83ec000a36cdd8	04/26/2022
Department of Revenue - Certificate of	DOR COGS.pdf	pdf	627e8c1d3bea2b0008ba518c	05/13/2022



Good standing

No documents uploaded

Massachusetts Business Identification Number: 001336523

Doing-Business-As Name: Suncrafted

DBA Registration City: Middleborough

#### BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	Plan to obtain insurance.pdf	pdf	62506e273eefeb000a26792c	04/08/2022
Proposed Timeline	4-22 Timeline.pdf	pdf	62506e393eefeb000a26796f	04/08/2022
Business Plan	2022 Business Plan.pdf	pdf	62506e3c3eefeb000a267983	04/08/2022
Proposed Timeline	Timeline details.pdf	pdf	625ef8635e5622000827afc0	04/19/2022

#### OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Energy Compliance Plan	Energy Compliance Plan.pdf	pdf	622b837a32b90c07941a8cb3	03/11/2022
Inventory procedures	Inventory Plan.pdf	pdf	622b837be449f407967dcd3d	03/11/2022
Maintaining of financial records	Maintenance of Financial Records Policy.pdf	pdf	622b837c9ca34b074e7a11ae	03/11/2022
Dispensing procedures	Dispensing procedures.pdf	pdf	622b837de938dd07a5f52789	03/11/2022
Restricting Access to age 21 and older	Plan to Restrict Access to 21 Years of Age.pdf	pdf	622b839932b90c07941a8cb7	03/11/2022
Prevention of diversion	Prevention of Diversion Plan.pdf	pdf	622b839a4dd71307b79cf509	03/11/2022
Qualifications and training	Qualifications and Intended Training.pdf	pdf	622b839b2882b60773c1e89b	03/11/2022
Personnel policies including background checks	Personnel Policies.pdf	pdf	622b839c440815076f416f08	03/11/2022
Plan for obtaining marijuana or marijuana products	Plan to obtain cannabis.pdf	pdf	622b839d09efaa0768b9160d	03/11/2022
Record Keeping procedures	Record Keeping Policies.pdf	pdf	622b83b10d00f5077626d506	03/11/2022
Security plan	Security Plan.pdf	pdf	622b83c24dd71307b79cf511	03/11/2022
Separating recreational from medical operations, if applicable	Separating medical and adult use operations.pdf	pdf	622b83c32882b60773c1e89f	03/11/2022
Storage of marijuana	Storage Plan.pdf	pdf	622b83c4440815076f416f14	03/11/2022
Quality control and testing	Quality Control and Testing Procedures.pdf	pdf	622b83c509efaa0768b91611	03/11/2022
Transportation of marijuana	Transportation Plan.pdf	pdf	622b83cb177b01078937efed	03/11/2022
Diversity plan	Dispensing Plan.pdf	pdf	625ef8f33eefeb000a32b083	04/19/2022



**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 Understand

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

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

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

**ADDITIONAL INFORMATION NOTIFICATION**

Notification: I Understand

**COMPLIANCE WITH POSITIVE IMPACT PLAN**

No records found

**COMPLIANCE WITH DIVERSITY PLAN**

No records found

**HOURS OF OPERATION**

Monday From: 10:00 AM	Monday To: 8:00 PM
Tuesday From: 10:00 AM	Tuesday To: 8:00 PM
Wednesday From: 10:00 AM	Wednesday To: 8:00 PM
Thursday From: 10:00 AM	Thursday To: 8:00 PM
Friday From: 10:00 AM	Friday To: 8:00 PM
Saturday From: 10:00 AM	Saturday To: 8:00 PM
Sunday From: 10:00 AM	Sunday To: 8:00 PM



## Community Outreach Meeting Attestation Form

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

I, Tim McNamara, (insert name) attest as an authorized representative of Holistic Health Group (insert name of applicant) that the applicant has complied with the requirements of 935 CMR 500 and the guidance for licensed applicants on community outreach, as detailed below.

1. The Community Outreach Meeting was held on October 18, 2019 (insert date).
2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on October 10, 2019 (insert date), which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A (*please clearly label the newspaper notice in the upper right hand corner as Attachment A and upload it as part of this document*).
3. A copy of the meeting notice was also filed on October 10, 2019 (insert date) with the city or town clerk, the planning board, the contracting authority for the municipality, and local licensing authority for the adult use of marijuana, if applicable. A copy of the municipal notice is attached as Attachment B (*please clearly label the municipal notice in the upper right-hand corner as Attachment B and upload it as part of this document*).
4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on October 4, 2019 (insert date), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (*please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee*).

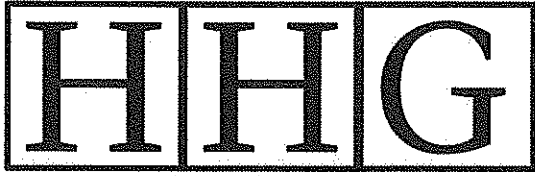


5. Information was presented at the community outreach meeting including:
  - a. The type(s) of Marijuana Establishment to be located at the proposed address;
  - b. Information adequate to demonstrate that the location will be maintained securely;
  - c. Steps to be taken by the Marijuana Establishment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









**Holistic Health Group, Inc.**

Holistic Health Group  
477 Wareham Street  
Middleborough, MA 023646  
info@holistichealthgroup.org

To all Town Officials:

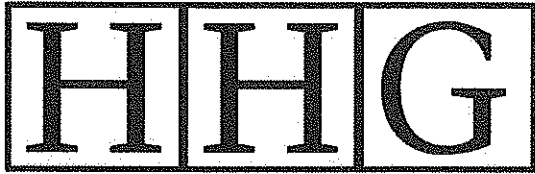
Notice is hereby given that a Community Outreach Meeting for a proposed cultivation/processing/retail adult use Marijuana Establishment is scheduled for Friday, October 18, 2019 at 4:30 PM, at the site location at 477 Wareham Street, South Middleborough. A brief presentation will be given in the construction trailer on the western boundary of the site, after which there will be an opportunity for the public to ask questions.

If you are unable to make this meeting but still have questions, please feel free to contact us using the information above.

Regards,

The Team at Holistic Health Group





**Holistic Health Group, Inc.**

Holistic Health Group  
202 Wood Street  
Hopkinton, MA 01748  
[info@holistichealthgroup.org](mailto:info@holistichealthgroup.org)

To [REDACTED],

You are receiving this communication as an owner of land abutting a proposed Cannabis production and sales establishment:

Notice is hereby given that a Community Outreach Meeting for a proposed cultivation/processing/retail adult use Marijuana Establishment is scheduled for Friday, October 18, 2019 at 4:30 PM, at the site location at 477 Wareham Street, South Middleborough. A brief presentation will be given in the construction trailer on the western boundary of the site, after which there will be an opportunity for the public to ask questions.

If you are unable to make this meeting but still have questions, please feel free to contact us using the information above.

Regards,

The Team at Holistic Health Group



## Host Community Agreement Certification Form

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

### Applicant

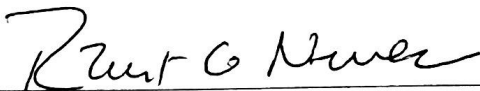
I, Tim McNamara, (insert name) certify as an authorized representative of Holistic Health Group (insert name of applicant) that the applicant has executed a host community agreement with Town of Middleborough (insert name of host community) pursuant to G.L.c. 94G § 3(d) on 9/16/2019 (insert date).



Signature of Authorized Representative of Applicant

### Host Community

I, Robert C. Ninos, (insert name) certify that I am the contracting authority or have been duly authorized by the contracting authority for Town of Middleborough (insert name of host community) to certify that the applicant and Town of Middleborough (insert name of host community) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on 9-16-19 (insert date).



Signature of Contracting Authority or  
Authorized Representative of Host Community



### **Plan to Remain Compliant with Local Zoning**

Holistic Health Group (HHG) has negotiated host agreements with the Town of Middleborough to cultivate, manufacture and dispense Cannabis at its location at 477 Wareham Street in the GUX industrial zoning district and Cannabis Business District as approved by the Planning Board and other town entities for these operations.

The company holds special permits for its operations in the medical and adult use markets pursuant to Middleborough Zoning Code §§200-4 et. seq., & 275-8.0-8.5, , and has secured host agreements for the same each with a 5 year term.

HHG does not anticipate any changes to the zoning by-law(s) of Middleborough, and will otherwise maintain its operations strictly within those guidelines created by said special permits.

It will be the responsibility of the compliance department, in coordination with other department management, to ensure compliance with local by-laws. HHG maintains open lines of communication with town officials and the police/fire departments. It is also the responsibility of the compliance department to keep informed on potential changes to local by-laws and to ensure the company maintains compliance.



## Plan for Positive Impact

Holistic Health Group Inc. (“HHG”) has set a goal of hiring 10% of its employees from communities disproportionately affected by the war on drugs. HHG will focus on hiring from the Taunton and Wareham communities to accomplish these hiring goals. To attain viable candidates HHG will use all available means of outreach that adhere to the requirements set forth in CCC regulation 935 CMR 500.105(4). All actions taken or programs implemented by HHG through this plan shall comply with the commission’s regulations with respect to limitations on ownership or control or other applicable state laws. HHG will document progress towards the below goals and at a minimum will report this progress during the annual license renewal process.

### Goal #1:

- HHG has a goal to hire 10% of employees that reside in communities disproportionately affected by the war on drugs.

### Program:

- HHG will host, at a minimum, two events per year targeting the identified areas of disproportionate impact, for the purposes of workforce outreach, career development and hiring. An online component via Zoom or similar application will be incorporated to account for any restrictions on public gatherings. These events will not have a set limit on number of participants beyond the capacity limits of the facility used.
  - Publicity will include targeted postings on social media (Instagram, LinkedIn, and any other relevant platforms on which HHG maintains a presence), and other means deemed viable, all in compliance with marketing regulations at 935 CMR 500.105(4). Advertisements and publicity will begin at least 2 weeks prior to the event. Frequency of the advertising during the 2 week period will vary by platform.
  - Said outreach efforts will explicitly include the company’s goal to encourage those who live in a community disproportionately impacted by the war on drugs.
  - The events will be hosted in a meet and greet format allowing candidates to come and discuss career opportunities or other topics of personal interest with subject matter experts and hiring managers from HHG.

All job postings will advertise HHG’s preference for candidates residing in areas of disproportionate impact.

### Metric:

- HHG will annually provide a timeline narrative of its hiring activities and statistics over the trailing 12 months. This Narrative will include the following information by quarter:



- Approximate number of employees working during this period, and of this number:
- Number of employees who resided in an area of disproportionate impact from the war on drugs.
- Summaries of hiring & outreach events held complete with publicity efforts, marketing materials and attendance statistics broken down as above.
- Total number of interviews with people meeting the above criteria.
- In addition, HHG will draft a report outlining its overall efforts and progress towards establishing a higher education-to-Cannabis career pipeline for students living in areas of disproportionate impact.
- HHG will report annually on challenges, obstacles, or any other issues it identifies that impede the company's stated goals.

**Goal #2:**

- HHG will create an online presentation, hosted on our website, that will guide any interested parties through the expungement process. Interested parties may be anyone with a criminal record. HHG will also create an email address, monitored by in house counsel Attorney Timothy McNamara, which will allow parties to reach out to ask questions. The presentation will be readily available at all times via the HHG website and have no limit on number of participants. HHG has a goal of 25 views per month and a response time of no more than 48 business hours on emails.

**Program:**

- The expungement program will achieve the following:
  - Provide an online resource to guide parties through the expungement process
  - Provide links to necessary paperwork for expungement
  - Provide a resource to ask questions about the process

**Metric:**

- HHG will annually provide a timeline narrative of its hiring activities and statistics over the trailing 12 months. This Narrative will include the following information by quarter:
  - Count of views of the expungement presentation
  - Count of email questions received
  - Breakdown of the questions received



**BY-LAWS**  
**Of**  
**HOLISTIC HEALTH GROUP, INC.**

**ARTICLE I**

**Offices**

The principal office of the corporation in the Commonwealth of Massachusetts shall be located at 477 Wareham Street, Middleborough, Plymouth County. The corporation may have such other offices, either within or without the State of incorporation as the board of directors may designate or as the business of the corporation may from time to time require.

**ARTICLE II**

**Stockholders**

1. *ANNUAL MEETING.*

The annual meeting of the stockholders shall be held on the 2<sup>nd</sup> Tuesday of February each year, beginning with the year 2019 at the hour of 9 o'clock AM., for the purpose of electing directors and for the transaction of such other business as may come before the meeting. If the day fixed for the annual meeting shall be a legal holiday such meeting shall be held on the next succeeding business day.

2. *SPECIAL MEETINGS.*

Special meetings of the stockholders, for any purpose or purposes, unless otherwise prescribed by statute, may be called by the president or by a majority of a quorum of the directors, and shall be called by the president at the request of the holders of not less than 75% per cent of all the outstanding shares of the corporation entitled to vote at the meeting.

3. *PLACE OF MEETING.*

The directors may designate any place, either within or without the State unless otherwise prescribed by statute, as the place of meeting for any annual meeting or for any special meeting called by the directors. A waiver of notice signed by all stockholders entitled to vote at a meeting may designate any place, either within or without the state unless otherwise prescribed by statute, as the place for holding such meeting. If no designation is made, or if a special meeting be otherwise called, the place of meeting shall be the principal office of the corporation.



4. *NOTICE OF MEETING.*

Written or printed notice stating the place, day and hour of the meeting and, in case of a special meeting, the purpose or purposes for which the meeting is called, shall be delivered not less than nor more than 10 days before the date of the meeting, either personally or by mail, by or at the direction of the president, or the secretary, or the officer or persons calling the meeting, to each stockholder of record entitled to vote at such meeting. If mailed, such notice shall be deemed to be delivered when deposited in the United States mail, addressed to the stockholder at his address as it appears on the stock transfer books of the corporation, with postage thereon prepaid.

5. *CLOSING OF TRANSFER BOOKS OR FIXING OF RECORD DATE.*

For the purpose of determining stockholders entitled to notice of or to vote at any meeting of stockholders or any adjournment thereof, or stockholders entitled to receive payment of any dividend, or in order to make a determination of stockholders for any other proper purpose, the directors of the corporation may provide that the stock transfer books shall be closed for a stated period but not to exceed, in any case, (70) days. If the stock transfer books shall be closed for the purpose of determining stockholders entitled to notice of or to vote at a meeting of stockholders, such books shall be closed for at least (10) days immediately preceding such meeting. In lieu of closing the stock transfer books, the directors may fix in advance a date as the record date for any such determination of stockholders, such date in any case to be not more than days and, in case of a meeting of stockholders, not less than (10) days prior to the date on which the particular action requiring such determination of stockholders is to be taken. If the stock transfer books are not closed and no record date is fixed for the determination of stockholders entitled to notice of or to vote at a meeting of stockholders, or stockholders entitled to receive payment of a dividend, the date on which notice of the meeting is mailed or the date on which the resolution of the directors declaring such dividend is adopted, as the case may be, shall be the record date for such determination of stockholders. When a determination of stockholders entitled to vote at any meeting of stockholder has been made as provided in this section, such determination shall apply to any adjournment thereof.

6. *VOTING LISTS.*

The officer or agent having charge of the stock transfer books for shares of the corporation shall make, at least 5 days before each meeting of stockholders, a complete list of the stockholders entitled to vote at such meeting, or any adjournment thereof, arranged in alphabetical order, with the address of and the number of shares held by each, which list, for a period of (5) days prior to such meeting, shall be kept on file at the principal office of the corporation and shall be subject to inspection by any stockholder at any time during usual business hours. Such list shall also be produced and kept open at the time and place of the meeting and shall be subject to the inspection of any stockholder during the whole time of the meeting. The original stock transfer book shall be prima facie evidence as to who are the stockholders entitled to examine such list or transfer books or to vote at the meeting of stockholders.



7. *QUORUM.*

At any meeting of stockholders, (51) percent of the outstanding shares of the corporation entitled to vote, represented in person or by proxy, shall constitute a quorum at a meeting of stockholders. If less than said percentage of the outstanding shares is represented at a meeting, a majority of the shares so represented may adjourn the meeting from time to time without further notice. At such adjourned meeting at which a quorum shall be present or represented, any business may be transacted which might have been transacted at the meeting as originally notified. The stockholders present at a duly organized meeting may continue to transact business until adjournment, notwithstanding the withdrawal of enough stockholders to leave less than a quorum.

8. *PROXIES.*

At all meetings of stockholders, a stockholder may vote by proxy executed in writing by the stockholder or by his duly authorized attorney in fact. Such proxy shall be filed with the secretary of the corporation before or at the time of the meeting.

9. *VOTING.*

Each stockholder entitled to vote in accordance with the terms and provisions of the certificate of incorporation and these by-laws shall be entitled to one vote, in person or by proxy, for each share of stock entitled to vote held by such stockholders. Upon the demand of any stockholder, the vote for directors and upon any question before the meeting shall be by ballot. All elections for directors shall be decided by plurality vote; all other questions shall be decided by majority vote except as otherwise provided by the Certificate of Incorporation or the laws of this State.

10. *ORDER OF BUSINESS.*

The order of business at all meetings of the stockholders, shall be as follows:

1. Roll Call.
2. Proof of notice of meeting or waiver of notice.
3. Reading of minutes of preceding meeting.
4. Reports of Officers.
5. Reports of Committees.
6. Election of Directors.
7. Unfinished Business.



8. New Business.

11. *INFORMAL ACTION BY STOCKHOLDERS.*

Unless otherwise provided by law, any action required to be taken at a meeting of the shareholders, or any other action which may be taken at a meeting of the shareholders, may be taken without a meeting if a consent in writing, setting forth the action so taken, shall be signed by all of the shareholders entitled to vote with respect to the subject matter thereof.

### ARTICLE III

#### Board of Directors

1. *GENERAL POWERS.*

The business and affairs of the corporation shall be managed by its board of directors. The directors shall in all cases act as a board, and they may adopt such rules and regulations for the conduct of their meetings and the management of the corporation, as they may deem proper, not inconsistent with these by-laws and the laws of this State.

2. *NUMBER, TENURE AND QUALIFICATIONS.*

The number of directors of the corporation shall be a minimum of (5). Each director shall hold office until the next annual meeting of stockholders and until his successor shall have been elected and qualified.

3. *REGULAR MEETINGS.*

A regular meeting of the directors, shall be held at a time and place determined by the President without other notice than this by-law. The directors may provide, by resolution, the time and place for the holding of additional regular meetings without other notice than such resolution.

4. *SPECIAL MEETINGS.*

Special meetings of the directors may be called by or at the request of the president or any two directors. The person or persons authorized to call special meetings of the directors may fix the place for holding any special meeting of the directors called by them.

5. *NOTICE.*

Notice of any special meeting shall be given at least (10) days previously thereto by written notice delivered personally, or by telegram or mailed to each director at his business address. If mailed, such notice shall be deemed to be delivered when deposited in the United States mail so addressed, with postage thereon prepaid. If notice be given by telegram, such



notice shall be deemed to be delivered when the telegram is delivered to the telegraph company. The attendance of a director at a meeting shall constitute a waiver of notice of such meeting, except where a director attends a meeting for the express purpose of objecting to the transaction of any business because the meeting is not lawfully called or convened.

6. *QUORUM.*

At any meeting (3) of the directors shall constitute a quorum for the transaction of business, but if less than said number is present at a meeting, a majority of the directors present may adjourn the meeting from time to time without further notice.

7. *MANNER OF ACTING.*

The act of the majority of the directors present at a meeting at which a quorum is present shall be the act of the directors.

8. *NEWLY CREATED DIRECTORSHIPS AND VACANCIES.*

Newly created directorships resulting from an increase in the number of directors and vacancies occurring in the board for any reason except the removal of directors without cause may be filled by a vote of a majority of the directors then in office, although less than a quorum exists. Vacancies occurring by reason of the removal of directors without cause shall be filled by vote of the stockholders. A director elected to fill a vacancy caused by resignation, death or removal shall be elected to hold office for the unexpired term of his predecessor.

9. *REMOVAL OF DIRECTORS.*

Any or all of the directors may be removed for cause by vote of the stockholders or by action of the board. Directors may be removed without cause only by vote of the stockholders.

10. *RESIGNATION.*

A director may resign at any time by giving written notice to the board, the president or the secretary of the corporation. Unless otherwise specified in the notice, the resignation shall take effect upon receipt thereof by the board or such officer, and the acceptance of the resignation shall not be necessary to make it effective.

11. *COMPENSATION.*

No compensation shall be paid to directors, as such, for their services, but by resolution of the board a fixed sum and expenses for actual attendance at each regular or special meeting of the board may be authorized. Nothing herein contained shall be construed to preclude any director from serving the corporation in any other capacity and receiving compensation therefor.

12. *PRESUMPTION OF ASSENT.*



A director of the corporation who is present at a meeting of the directors at which action on any corporate matter is taken shall be presumed to have assented to the action taken unless his dissent shall be entered in the minutes of the meeting or unless he shall file his written dissent to such action with the person acting as the secretary of the meeting before the adjournment thereof or shall forward such dissent by registered mail to the secretary of the corporation immediately after the adjournment of the meeting. Such right to dissent shall not apply to a director who voted in favor of such action.

13. *SPECIAL APPOINTMENT OF DIRECTORS.*

In the event that there are fewer than the required minimum directors, the President may appoint a special director or directors to serve for a term for the lesser of one year, or until such time that the directors duly elect a replacement director(s).

14. *EXECUTIVE AND OTHER COMMITTEES.*

The board, by resolution, may designate from among its members an executive committee and other committees, each consisting of one or more directors. Each such committee shall serve at the pleasure of the board.

## ARTICLE IV

### Officers

1. *NUMBER.*

The officers of the corporation shall be a president, a vice president, a secretary and a treasurer, each of whom shall be elected by the directors. Such other officers and assistant officers as may be deemed necessary may be elected or appointed by the directors.

2. *ELECTION AND TERM OF OFFICE.*

The officers of the corporation to be elected by the directors shall be elected annually at the first meeting of the directors held after each annual meeting of the stockholders. Each officer shall hold office until his successor shall have been duly elected and shall have qualified or until his death or until he shall resign or shall have been removed in the manner hereinafter provided.

3. *REMOVAL.*

Any officer or agent elected or appointed by the directors may be removed by the directors whenever in their judgment the best interests of the corporation would be served thereby, but such removal shall be without prejudice to the contract rights, if any, of the person so removed.

4. *VACANCIES.*



A vacancy in any office because of death, resignation, removal, disqualification or otherwise, may be filled by the directors for the unexpired portion of the term.

5. *PRESIDENT.*

The president shall be the principal executive officer of the corporation and, subject to the control of the directors, shall in general supervise and control all of the business and affairs of the corporation. He shall, when present, preside at all meetings of the stockholders and of the directors. He may sign, with the secretary or any other proper officer of the corporation thereunto authorized by the directors, certificates for shares of the corporation, any deeds, mortgages, bonds, contracts, or other instruments which the directors have authorized to be executed, except in cases where the signing and execution thereof shall be expressly delegated by the directors or by these by-laws to some other officer or agent of the corporation, or shall be required by law to be otherwise signed or executed; and in general shall perform all duties incident to the office of president and such other duties as may be prescribed by the directors from time to time.

6. *VICE PRESIDENT.*

The vice president shall, in the absence of the president, be the principal executive officer of the corporation and, subject to the control of the directors, shall in general supervise and control all of the business and affairs of the corporation. He shall, when present, preside at all meetings of the stockholders and of the directors. He may sign, with the secretary or any other proper officer of the corporation thereunto authorized by the directors, certificates for shares of the corporation, any deeds, mortgages, bonds, contracts, or other instruments which the directors have authorized to be executed, except in cases where the signing and execution thereof shall be expressly delegated by the directors or by these by-laws to some other officer or agent of the corporation, or shall be required by law to be otherwise signed or executed; and in general shall perform all duties incident to the office of president and such other duties as may be prescribed by the directors from time to time.

7. *SECRETARY.*

The secretary shall keep the minutes of the stockholders' and of the directors' meetings in one or more books provided for that purpose, see that all notices are duly given in accordance with the provisions of these by-laws or as required, be custodian of the corporate records and of the seal of the corporation and keep a register of the post office address of each stockholder which shall be furnished to the secretary by such stockholder, have general charge of the stock transfer books of the corporation and in general perform all duties incident to the office of secretary and such other duties as from time to time may be assigned to him by the president or by the directors.



8. *TREASURER.*

If required by the directors, the treasurer shall give a bond for the faithful discharge of his duties in such sum and with such surety or sureties as the directors shall determine. He shall have charge and custody of and be responsible for all funds and securities of the corporation; receive and give receipts for moneys due and payable to the corporation from any source whatsoever, and deposit all such moneys in the name of the corporation in such banks, trust companies or other depositories as shall be selected in accordance with these by-laws and in general perform all of the duties incident to the office of treasurer and such other duties as from time to time may be assigned to him by the president or by the directors.

9. *SALARIES.*

The salaries of the officers shall be fixed from time to time by the directors and no officer shall be prevented from receiving such salary by reason of the fact that he is also a director of the corporation.

## **ARTICLE V**

### **Contracts, Loans, Checks and Deposits**

1. *CONTRACTS.*

The directors may authorize any officer or officers, agent or agents, to enter into any contract or execute and deliver any instrument in the name of and on behalf of the corporation, and such authority may be general or confined to specific instances.

2. *LOANS.*

No loans shall be contracted on behalf of the corporation and no evidences of indebtedness shall be issued in its name unless authorized by a resolution of the directors and by the President. Such authority may be general or confined to specific instances. Loans not contracted for in this manner shall inure to such agent personally, and said agent shall likewise indemnify the corporation for any such liabilities.

3. *CHECKS, DRAFTS, ETC.*

All checks, drafts or other orders for the payment of money, notes or other evidences of indebtedness issued in the name of the corporation, shall be signed by such officer or officers, agent or agents of the corporation and in such manner as shall from time to time be determined by resolution of the directors.

4. *DEPOSITS.*

All funds of the corporation not otherwise employed shall be deposited from time to time to the credit of the corporation in such banks, trust companies or other depositories as the



directors may select.

## ARTICLE VI

### Certificates for Shares and Their Transfer

#### 1. *CERTIFICATES FOR SHARES.*

Certificates representing shares of the corporation shall be in such form as shall be determined by the directors. Such certificates shall be signed by the president and by the secretary or by such other officers authorized by law and by the directors. All certificates for shares shall be consecutively numbered or otherwise identified. The name and address of the stockholders, the number of shares and date of issue, shall be entered on the stock transfer books of the corporation. All certificates surrendered to the corporation for transfer shall be canceled and no new certificate shall be issued until the former certificate for a like number of shares shall have been surrendered and canceled, except that in case of a lost, destroyed or mutilated certificate a new one may be issued therefor upon such terms and indemnity to the corporation as the directors may prescribe.

#### 2. *TRANSFERS OF SHARES.*

(a) Upon surrender to the corporation or the transfer agent of the corporation of a certificate for shares duly endorsed or accompanied by proper evidence of succession, assignment or authority to transfer, it shall be the duty of the corporation to issue a new certificate to the person entitled thereto, and cancel the old certificate; every such transfer shall be entered on the transfer book of the corporation which shall be kept at its principal office.

(b) The corporation shall be entitled to treat the holder of record of any share as the holder in fact thereof, and, accordingly, shall not be bound to recognize any equitable or other claim to or interest in such share on the part of any other person whether or not it shall have express or other notice thereof, except as expressly provided by the laws of this state.

(c) Any signatory to the by-laws hereunder as shareholder shall, prior to the transfer of any such shares shall, upon receipt of a bona fide offer to purchase such shares, inform all other shareholders of this corporation an intent to sell for the terms proposed therein and offer to said shareholders the same purchase terms for a period no greater or less than 60 days.

(d) Any transfer of shares that does not meet these provisions shall be void, and any voting rights associated with such shares may, upon written notice by the President to their holder, be suspended until such time that the directors can determine the validity of said transfer.



## ARTICLE VII

### Conflicts of Interest

#### 1. *PROCEDURES.*

Whenever the Corporation contemplates entering into a transaction that might benefit a director or officer, or a member of a committee with Board-delegated powers, who has a direct or indirect financial interest in the transaction or arrangement (each, a "Disqualified Person"), the following procedures shall apply:

- (a) The Disqualified Person shall disclose the existence and nature of the financial interest to the disinterested directors, officers or committee members considering the transaction or arrangement.
- (b) The Disqualified Person, if present, shall leave the meeting while the disinterested directors, officers or committee members discuss the existence of a conflict of interest and the potential for private inurement to the Disqualified Person, and during the vote on the transaction or arrangement.
- (c) The disinterested directors, officers or committee members shall consider whether the transaction or arrangement is in the Corporation's best interest, for its own benefit, and whether it is fair and reasonable. Alternatives to the proposed transaction shall be discussed, and comparability data reviewed to assess fair market value. The Corporation may utilize the services or data of independent third parties in making such a determination.
- (d) The minutes of the meeting at which the proposed transaction or arrangement is discussed shall contain the following: (i) the name of the Disqualified Person; (ii) the nature of the financial interest; (iii) the terms of the proposed transaction or arrangement; (iv) the content of the discussions and the summary of any actions taken and/or comparability data reviewed in order to evaluate any alternatives and to assess the fair market value of the proposed transaction or arrangement; and (v) the names of the disinterested persons present for the discussions and votes with respect to the proposed transaction or arrangement; and the record of the vote.

#### 2. *ANNUAL WRITTEN DISCLOSURES.*

Each director, officer or committee member shall annually disclose in writing his or her business involvements with the Corporation, and his or her other board memberships, both for-profit and charitable. The information should be updated throughout the year, as necessary. In addition, each director shall make an annual disclosure of the total amount the Director received from the Corporation during the previous year as a vendor of goods to the Corporation, or on account of services rendered to the Corporation. The disclosure described in this section shall be provided to the entire Board of Directors.



3. *REMEDIES*

Any transaction or arrangement not in compliance with this Article VI may be voided, retroactive to the date of the purported transaction or arrangement, by a majority vote of a quorum of the directors.

**ARTICLE VIII**

**Fiscal Year**

The fiscal year of the corporation shall begin on the 1st day of January in each year.

**ARTICLE IX**

**Dividends**

The directors may from time to time declare, and the corporation may pay, dividends on its outstanding shares in the manner and upon the terms and conditions provided by law.

**ARTICLE X**

**Seal**

The directors shall provide a corporate seal which shall be circular in form and shall have inscribed thereon the name of the corporation, the state of incorporation, year of incorporation and the words, "Corporate Seal".

**ARTICLE XI**

**Waiver of Notice**

Unless otherwise provided by law, whenever any notice is required to be given to any stockholder or director of the corporation under the provisions of these by-laws or under the provisions of the articles of incorporation, a waiver thereof in writing, signed by the person or persons entitled to such notice, whether before or after the time stated therein, shall be deemed equivalent to the giving of such notice.

**ARTICLE XII**

**Amendments**

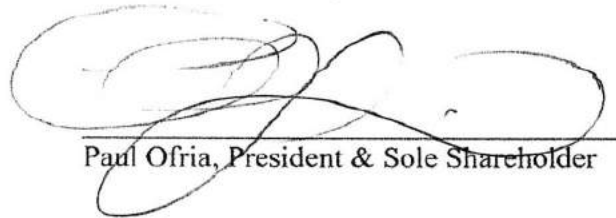
These by-laws may be altered, amended or repealed and new by-laws may be adopted by a vote of the stockholders representing a majority of all the shares issued and outstanding, at any



annual stockholders' meeting or at any special stockholders' meeting when the proposed amendment has been set out in the notice of such meeting.

Approved and Accepted:

Date: 12-20-2019



Paul Ofria, President & Sole Shareholder





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

Charles D. Baker  
GOVERNOR

Karyn E. Polito  
LT. GOVERNOR



391997315

Rosalin Acosta  
SECRETARY

Richard A. Jeffers  
DIRECTOR

HOLISTIC HEALTH GROUP INC  
Attn: Tim McNamara  
477 Wareham St  
Middleboro, MA 02346-3421

EAN: 22177569  
April 19, 2022

Certificate Id:58098

The Department of Unemployment Assistance certifies that as of 4/19/2022 ,HOLISTIC HEALTH GROUP INC 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





## The Commonwealth of Massachusetts

### William Francis Galvin

No Fee

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

### Statement of Change of Supplemental Information

(General Laws, Chapter 156D, Section 2.02 AND Section 8.45; 950 CMR 113.17)

**1. Exact name of the corporation:** HOLISTIC HEALTH GROUP, INC.

**2. Current registered office address:**

Name: MCNAMARA & YATES, P.C.

No. and Street: 128 RTE, 6A

City or Town: SANDWICH

State: MA

Zip: 02563

Country: USA

**3. The following supplemental information has changed:**

Names and street addresses of the directors, president, treasurer, secretary

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
PRESIDENT	TIM MCNAMARA ESQ	54 MARKET ST MASHPEE, MA 02649 USA
TREASURER	KEN OFRIA	202 WOOD ST. HOPKINTON, MA 01748 USA
SECRETARY	TIM MCNAMARA ESQ	54 MARKET ST MASHPEE, MA 02649 USA
CEO	PAUL OFRIA	202 WOOD ST HOPKINTON, MA 01748 USA
DIRECTOR	TIM MCNAMARA ESQ	54 MARKET ST MASHPEE, MA 02649 USA
DIRECTOR	PAUL OFRIA	202 WOOD ST. HOPKINTON, MA 01748 USA
DIRECTOR	KEN OFRIA	202 WOOD ST. HOPKINTON, MA 01748 USA

**\_\_\_ Fiscal year end:**

December

**\_\_\_ Type of business in which the corporation intends to engage:**

CULTIVATION, MANUFACTURE & SALE OF CANNABIS

**\_\_\_ Principal office address:**

No. and Street: 477 WAREHAM ST.

City or Town: MIDDLEBOROUGH

State: MA

Zip: 02346

Country: USA

**\_\_\_ g. Street address where the records of the corporation required to be kept in the Commonwealth are located (post office boxes are not acceptable):**



No. and Street: 477 WAREHAM ST.

City or Town: MIDDLEBOROUGH

State: MA

Zip: 02346

Country: USA

**which is**

☒ its principal office

☐ an office of its transfer agent

☐ an office of its secretary/assistant secretary

☐ its registered office

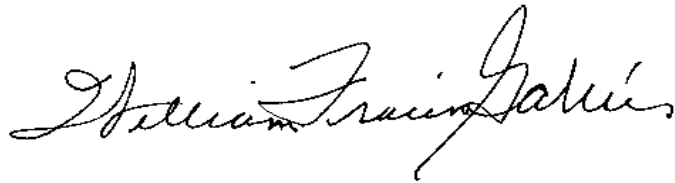
**Signed by TIM MCNAMARA , its PRESIDENT  
on this 2 Day of March, 2021**



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:

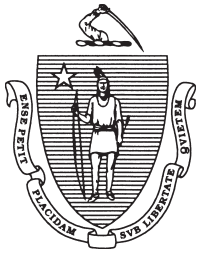
March 02, 2021 02:26 PM

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

WILLIAM FRANCIS GALVIN

*Secretary of the Commonwealth*





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

William Francis Galvin  
Secretary of the  
Commonwealth

Date: April 21, 2022

To Whom It May Concern :

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

**HOLISTIC HEALTH GROUP, INC.**

is a domestic corporation organized on **July 12, 2018** , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



In testimony of which,

I have hereunto affixed the

Great Seal of the Commonwealth

on the date first above written.

*William Francis Galvin*

Secretary of the Commonwealth

Certificate Number: 22040504540

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

Processed by: bod





## CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



HOLISTIC HEALTH GROUP INC  
477 WAREHAM ST  
MIDDLEBORO MA 02346-3421

### ***Why did I receive this notice?***

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

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

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

### ***What if I have questions?***

If you have questions, call us at (617) 887-6400 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 9:00 a.m. to 4:00 p.m..

### ***Visit us online!***

Visit [mass.gov/dor](http://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



### **Plan to Obtain Insurance**

HHG has obtained the following coverage for insurance:

- General liability of \$1,000,000 per occurrence and \$2,000,000 in the aggregate, annually with a deductible not to exceed \$5,000 per occurrence.
- Product liability for \$1,000,000 per occurrence and \$2,000,000 in the aggregate, annually with a deductible not to exceed \$5,000 per occurrence.
- Workers Compensation insurance is in place for all employees at HHG.
- Healthcare Insurance, including vision and dental, is available to all employees at HHG.



## 2022 Business Plan

 **HOLISTIC HEALTH GROUP** INC.



## HHG Corporate Summary

HHG is a Massachusetts corporation formed in 2016 to cultivate, process and dispense Cannabis to qualifying patients in the Commonwealth as a Registered Marijuana Dispensary (RMD), and for the adult use market. The corporation is in the midst of its licensing process with the Cannabis Control Commission (CCC), with final licensure on its outdoor grow and other licenses (cultivation, manufacturing & retail in the pipeline as the facility proceeds to final occupancy). Having obtained all town approvals to carry out its in Middleborough, the company presently employs about 10 full time staff with 5 more hires expected within the next 3-4 months.

Holistic Health Group is committed to continue its leadership in sustainable cultivation and production practices among most if not all other operators in the northeastern United States using all available technologies. On a long term basis, and as operations commence, the company plans to focus its product development on the medicinal and palliative applications of Cannabis by phenological, genealogical and other means, a goal it believes will benefit the entire market.

## HHG Formula for Success – A Unique Combination of Industry Strengths

**Efficiency:** Holistic Health Group has been focused on planning over speed for its entry into the Cannabis market. The HHG One facility in Middleborough was planned from the ground up with a primary focus of cultivation efficiency and work flow, and a secondary focus of building an efficient, meaningful and pleasant working experience for its employees. The closely held organization has a single investor source so that these goals are not at odds with divergent influences that other companies face.

**Sustainability:** Massachusetts regulations restrict maximum lighting power density (LPD) between thresholds ranging of 36 and 50, due to State concerns about the significant power usage use in indoor cultivation. HHG aims to surpass 95% of other MA licensees in reducing LPD. Hybrid greenhouse design is the hallmark of Holistic Health Group's operations. While nearly all other operators in Massachusetts have opted for existing indoor warehouses and/or new steel buildings, HHG has committed to modern agricultural technologies for its cultivation ranging from LED lighting for its early, mother & supplemental greenhouse lighting. In addition the company's site is improved with just short of an acre of outdoor Cannabis processing & cultivation areas with canopy potential of up to 13,000 square feet.

**Equity:** Massachusetts regulations express a preference that Cannabis licenses be granted to entities majority owned by in-state residents -- or under economic empowerment by certain races, as well as those with Cannabis related drug offenses in the past. All owners and investors of the company have resided in Massachusetts for their entire lives, and President Tim McNamara experienced a Cannabis offense in his past, meaning the group has a personal commitment to resolving the impact of the war on drugs in Massachusetts. As part of its commitment for positive impact to the community, HHG conducts hiring activities in communities designated by the Commission for that purpose, and McNamara uses his legal background to give seminars on criminal record expungement and sealing.

**Scale & Scalability:** Other state markets have revealed that prices by weight may fall by as much as 300% in a three year period, so that apart from operational cost controls, volume will be increasingly important towards profitability in the maturing Cannabis market. HHG's greenhouse building includes some 1,920 square feet of mother/clone plant canopy, 3,168 of vegetative plant canopy, and 8,820 sq. ft. of flowering canopy, with harvests planned on a bi-weekly schedule.

**Research & Development:** Like all RMD applicants, the company will serve an important purpose in providing the best and latest treatments to their patients – in addition to sustainable quality products for consumers. HHG's officers were attendees at the annual CannMed conference held at Harvard Medical School, and the group is engaged in building targeted operations for institutional caregivers permitted by Massachusetts regulations that it believes will enhance the medical market, and provide a useful tool for researchers in internal medicine.



## Seed-to-Sale Operation Specifics

**Cultivation-Specific Operations:** The cultivation facility will run approximately 8-10 hours per day, seven days a week with a total staff of approximately 15 employees. One of the few hybrid greenhouse operations in the State of Massachusetts, HHG believes it will surpass nearly all other Cannabis cultivation facilities in the region in terms of energy efficiency and carbon emission reduction. This is particularly relevant where Massachusetts is the first state to employ limitations on power consumption.

The greenhouse design incorporates state of the art light deprivation curtain systems for flowering periods, and also includes thermal curtains for added insulation during the colder New England months. As the facility expands to meet further expected product demand in the State, the company will continue to integrate newer systems of automation for workflow functions such as fertigation and harvesting activities.

In its joint efforts towards creating a sustainable and high quality working environment, HHG will mix its own soil in-house to reduce repetitive & laborious tasks, while at the same time replacing waste-intensive disposable potting containers with its own reusable pots. Waste too will be processed and amended with inert materials, but slated for composting rather than bagged waste in a landfill.

HHG has built custom drying and curing rooms with food grade dehumidification and climate control systems perfected in other industries, to ensure breadth and depth in Cannabinoid preservation. Because the post-harvest stage is one of the most critical periods in the preparation of high quality Cannabis with low contamination, HHG employed these state of the art drying & curing methods to enable precision adjustments of water content and temperature over varying lengths of time.

**Extraction-Specific Operations:** Like the drying and curing processes, extraction is an equally critical aspect of HHG's operations with respect to Cannabis derivative products. The company has plans for solventless extraction as a means to produce high quality extracts using all natural elements with the help of only ice and water. Later, as operations develop HHG will incorporate ethanol extraction as a means for more comprehensive and exhaustive cannabinoid capture, with greater refinement options. In time the company may adopt extraction methods using other methods and solvents, based on the demand it experiences in the medical and adult use markets.

### **Manufacture-Specific Operations:**

The company has a robust and highly automated flower & preroll manufacturing program to support products that still comprise roughly 70% of the Massachusetts market. Vape cartridges and concentrates from its extraction operations will supplement this product array, and a commercial grade kitchen is presently being built out for the manufacture of chewables and other edible products that incorporate Cannabis extracts. Product development will ultimately be driven by consumer demand and market research, but HHG's intent is to create single serve and low-dosage, (e.g. 5mg THC) multi-serving packaged goods. Anecdotal and empirical studies conducted in other recently regulated jurisdictions indicate that consumers are often given Cannabis without a proper understanding of dosage, and experience negative effects as a result.

Education will therefore be an important focus for the company, especially in the early days of operations. Packaging likewise will meet all Massachusetts regulations regarding consumer disclosure, but the group is focused on making dosage information as clear as possible for its patients, clients and its host community at large to ensure the least possibility of overdosing from THC.



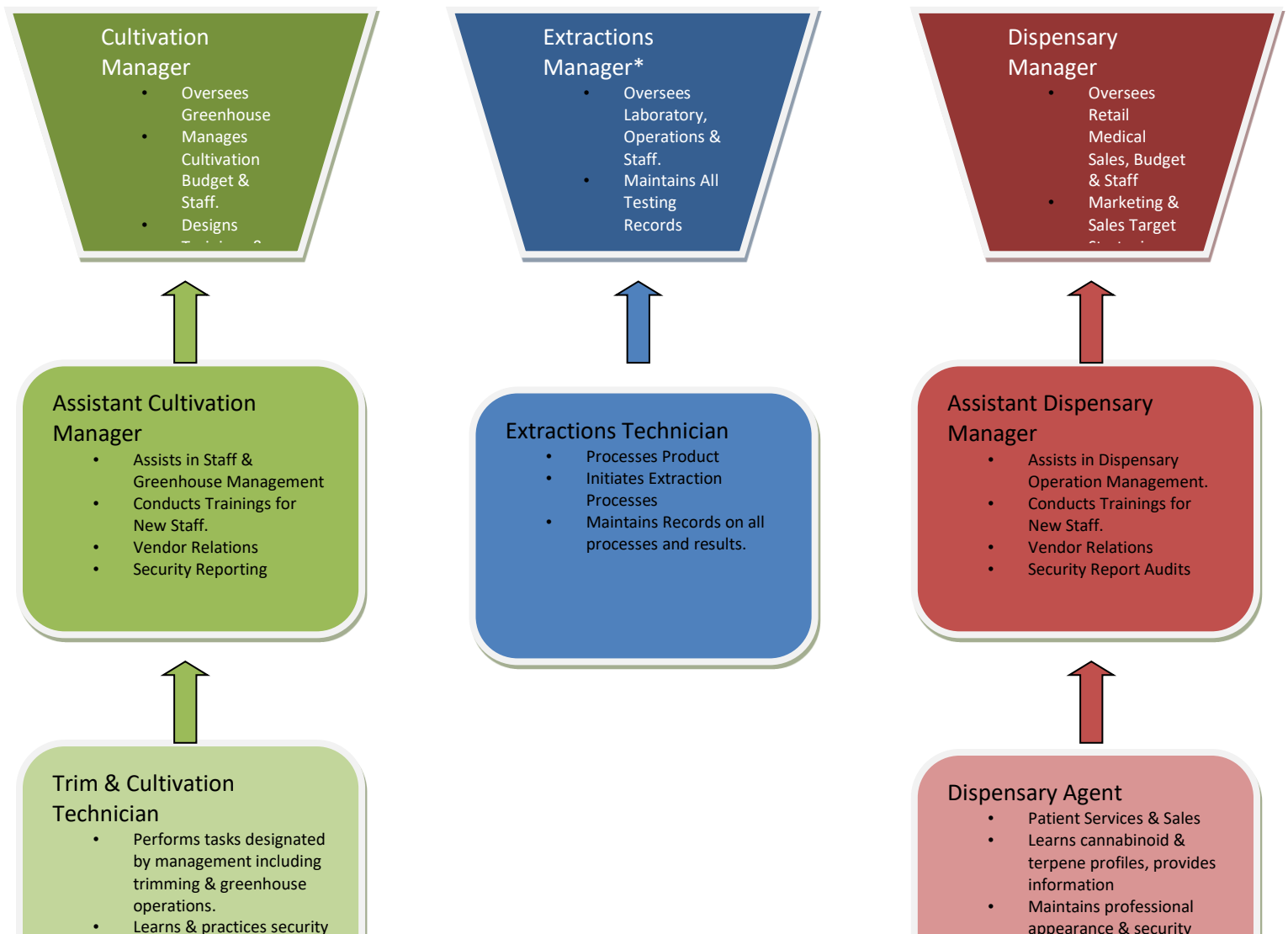
## Sales-Specific Operations:

**Products:** HHG will be selling a wide variety of dried & cured Cannabis flower and concentrate, along with a selection of Cannabis derivative and infused products such as tinctures and edibles. The company plans to have a line of CBD-heavy products as well, and is in talks with Massachusetts licensed hemp operators for ingredient supply. While the products in both medical and adult use markets will be similar, medicinal products will often feature higher dosages of THC as permitted under Massachusetts regulations. Specific products will be reflected online and in the company's dispensary in a weekly updated menu for patient and customer information.

**Customer Service:** HHG will be conducting regular trainings for staff on customer and patient service as part of its obligations under State licensing regulations, as well as its commitment to the overall sales experience. These trainings will cover a range of related factors including but not limited to dress code, professionalism & etiquette, security protocols, product handling and disposal, Cannabis product dosage guidelines & general Cannabis education. HHG has engaged "Sinsemilla Seminars" for its responsible vendor training required by State regulations.

**Competitor Differentiation:** The management of HHG believes its focus on employee education and patient/client communication distinguishes the company from others in the industry. Every member of the HHG workforce is encouraged to wear multiple hats, and exposure to work in other departments not only permits an employee to move across the company's operations for career growth, but also in providing a more holistically educated workforce in general on commercial cannabis production. This caliber of employee will likewise provide a better patient & consumer experience, and a better example of an educated staff to the public in general.

**HHG Plant-touching Careers Diagram**





With respect to patients and clients, the company additionally believes that anyone visiting an HHG dispensary should have immediate access to product information during any waiting periods. A number of vendors provide electronic and print services that HHG will use for this purpose. Plans for the company include the use of modern communications technologies to institute a robust customer feedback program to ascertain where improvements may be made.

Continued emphasis on these aspects of the customer experience will position HHG as a strong competitor in this industry.

## **Massachusetts Cannabis Market at a Glance**

HHG's plans have centered on the assumption that approximately 3% of the Massachusetts population may be considered a patient with a medical marijuana recommendation. That said, the market differs within each locale HHG will operate in, though some general statistics were highlighted in a DPH survey to shed light on state-wide trends.

- 21% of respondents consumed Cannabis in the past 30 days (26% of men; 17 percent of women).
- Recent data shows that adult use basket size is roughly \$41.00.
- Smoking remains the most popular delivery method, but close to 50% use various methods.
- The agency's medical market snapshots do not exist, but the population is still increasing marginally.

The company has operations or plans to operate in the following locales:

**Middleborough:** HHG's hub of operations will be in Middleborough which is home to approximately 25,000 people. The facility is just off I495 Exit 8 which sees nearly 40k cars per day (20k in each direction), and significant increases during the summer months for traffic to Cape Cod. While another dispensary is expected to open between HHG and this highway, HHG's parking lot will hold up to 60 customers compared to roughly 6 at the competitor's location. If HHG uses I495 instead of the town population as a baseline, the company at 21% of one direction of traffic shared equally by two licensees could expect to serve up to 2100.

While this would ordinarily require a high volume of customers moving through an approximate 1000 square foot sales floor, the company's plans for online ordering, express pickup and self-service kiosks should aid in mitigation of customer traffic. For further context another nearby dispensary in neighboring Wareham reported seeing roughly 1100-1800 customers per day, or 1.3M to \$2.2M per month.

### **Other Market Factors**

HHG is the only group to its knowledge that is actively seeking to work within the Institutional Caregiver framework under amended DPH regulations for sales to nursing homes, hospice clinics and the like. The



company believes this market segment will be enhanced as federal and state laws catch up with the medicinal value of Cannabis for a variety of age-related illness and disease ranging from Alzheimer's to Arthritis. Inquiries for more information on this program, named Silverleaf, should be directed to the management team.

## **Risks and Opportunities**

Despite a sea change in sentiment in the majority of state governments (and in federal elected representatives) regarding acceptance of both medical and adult use marijuana, federal prohibition of the substance and its Schedule I status persists. The group sees as the obvious biggest risk to its operations until a change in legislation occurs. In the meantime, access to banking, investment, insurance and the U.S. consumer market will be limited to HHG as with all Cannabis businesses.

At the same time, the interplay between state and federal prohibition present an opportunity for HHG to stake out key geographical and market territory in the cities and towns where it operates. Whether or not federal legalization occurs, state and local zoning of cultivation, processing and retail sales of marijuana are likely to remain consistent for many years thereafter. New England is comprised of many well-established communities where land and space for development is a fixed resource, so it is unlikely that any major zoning changes will occur within them.

Still, many towns throughout Massachusetts are continuing to evolve their regulations as Cannabis enjoys wider adoption and less fear from the general population. Some of these towns have severely limited, effectively prohibited, or outright banned the operation of adult use Cannabis businesses within their borders, though this trend will abate to some extent if past experience can be relied upon as a predictor. This will in turn modify the competitive landscape for some Cannabis business operators located near such towns.

Supply gluts too can be considered a moderate risk factor for Massachusetts Cannabis businesses. The State's zoning and licensing laws are sufficiently complex to prevent too much cultivation from coming online at the same time in the way that was recently reported in Washington and Oregon. But there is a real threat that the New England trend of legalization on the one hand, and black or gray market activities on the other, is causing downward pressure on wholesale pricing of Cannabis. Outdoor cultivation also has left its mark somewhat seasonally on the downward adjustment of bulk material pricing, however much of this can be attributed to the necessity to slate said material for extraction based on the State's stringent microbe testing thresholds. HHG's vertically integrated model with in-house remediation technology will aid to balance this threat, as it will be able to maintain complete market control from production through sales.

## **Management Team**

**Paul Ofria, CEO** - Paul was born and raised in Dorchester and greater Boston, started early working in technical sales, then later started and ran an electronic billing software company, as well as entering the wireless communications market during the telecom boom.

**Tim McNamara, President & General Counsel** – From the Cape, Tim is an attorney and entrepreneur with over a decade of experience in business law and some six years' experience in building and consulting for the cannabis industry as general counsel for HHG and several other operators in Massachusetts.



# Appendix A – HHG Business Timeline

## HHG Business Timeline 2022

T. McNamara | December 29, 2021

	Description	Q1			Q2			Q3			Q4		
		Jan	Feb	March	April	May	June	July	August	September	October	November	December
Licensing & Permitting	Outdoor Cultivation License (AU)		◆										
	Indoor Cultivation License (AU)												
	Manufacturing License (AU)				◆								
	Retail License (AU)				◆								
	Medical License		◆										
Manufacturing Product Lines	Prerolls		◆										
	Concentrate		◆										
	Vape Cartridges		◆										
	Flower												
	Tincture												
	Chewable Gummy												
	Chocolate Edible												
	Cookies												
Indoor Cultivation	Propagation/Mother/Veg		◆										
	First Flower Room												
	Flower Rooms 2 & 3												
	Flower Rooms 4 & 5												
Outdoor Cultivation S3	Propagation												
	Veg/Flower/Harvest												
Retail Marketing	Website												
	Social Media Account Activation												
	Merchandising												
Staffing	1-10 Employees												
	11-17 Employees												
	18-24 Employees												
	25+ Employees												

Legend: ◆ Milestone is complete ◆ Milestone is behind schedule — Current date



## ENERGY COMPLIANCE PLAN

### CULTIVATION

#### Plan for Eye Safety

Due to the high intensity lighting utilized in cultivation, eye safety is critical. To address this, HHG has established eye safety protocols to ensure a safe working environment for all cultivation staff.

#### *Safety protocols:*

HHG will provide all employees with the necessary protective eyewear. In addition to protective eyewear, HHG will take additional steps to limit employee exposure to high intensity lighting where possible. These steps may include, though not limited to:

- Turning off supplemental lighting during work in rooms when possible.
- When turning lights off is not an option, limiting consecutive time in a room before a required break.
- Scheduling work in greenhouse rooms to avoid times when sunlight is at its peak.

#### *Communication:*

Eye safety protocols will be communicated to all staff during initial onboarding. In addition, signage will be placed in relevant areas to remind associates of protective measures. The cultivation director and designated management staff will be responsible for reinforcing the safety protocols.

#### *PPE:*

All cultivation staff will be issued protective eyewear suitable for the lighting conditions in our facility. When not in use, protective eyewear will be left onsite, in designated storage. This will ensure PPE is always available for employees, and not forgotten elsewhere. Additional pairs of protective eyewear will be available in case of damaged or compromised eyewear that requires replacement and are available for any visitors.

#### *Signage:*

All areas utilizing high intensity lighting will have signage on or near the door stating, “High Intensity Lighting in Use – Proper Eye Protection Required”.

### ***Energy Usage***

[Energy Usage Engineer Letter](#)

## MANUFACTURING

### ***Energy use reduction opportunities:***



HHG is committed to maintaining the most sustainable cannabis operations possible. To this end, we have taken the following steps to help reduce overall energy use in our manufacturing facility:

- All lighting installed in the manufacturing, office and employee spaces are LED lights.
- Motion sensors are used in key areas to ensure lights are turned off when not needed.
- Breakroom is furnished with EnergyStar rated appliances.
- Energy efficient HVAC system with integrated smart controller.
- Spray foam insulation in all exterior walls.

HHG will routinely monitor total energy consumption for the facility for trends and deviations by reviewing power consumption at least monthly. When increased consumption is detected, steps will be taken to identify the reason for the increase. If the increase is part of a normal trend (seasonal change, crop rotation, etc.) no actions will be taken. If the increase is not due to normal trends the root cause will be reviewed and remediated.

To further energy efficiency, whenever the company undertakes facility upgrades, renovations or expansion, all efforts will be made to integrate energy efficient options with these projects. In addition, whenever replacing failed equipment within the facility, energy efficiency will be considered as a primary deciding factor.

***Renewable options:***

HHG will review energy consumption and potential suppliers on an annual basis. This review will include reviewing any options that are available to purchase energy produced from renewable sources. Renewable supply options will be used in any instance where they are economically viable. A upgrades, expansions or renovations are undertaken, the company will actively seek ways to take advantage of the work and integrate additional renewable options where possible. The same considerations will be ~~taken~~taken when replacing any failed equipment.

***Energy efficiency programs:***

HHG is located in Middleborough and is serviced by Middleborough Gas & Electric, which does not participate in MassSave. In reviewing the options provided by the guidance documentation on energy compliance ([Energy Efficiency | Energy New England - ENE](#)), the company was not able to locate and audit or rebate services available to commercial clients, instead the page relating to these services returns a 404 not found error. HHG will continue to engage with Middleborough Gas & Electric to review any programs that the company may qualify for in the future.



## **MAINTENANCE OF FINANCIAL RECORDS POLICY**

A thorough recordkeeping plan maintains the regulatory integrity of the Adult-Use marijuana Program and creates a record of activities, transactions, and decisions which safeguards a company's information and also holds it accountable for its actions.

HHG has established stringent recordkeeping protocols which demonstrate fidelity to compliance and security, and safeguard patient safety. Inventory protocols, electronic tracking system use, equipment maintenance, and other extensive business records will be created and maintained in full compliance with Cannabis Control Commission ("Department"), OSHA and local regulations.

In compliance with 935 CMR 500, HHG will maintain a daily log of each day's beginning inventory, acquisitions, amounts purchased and sold, disbursements, disposals, and ending inventory. HHG will also record prices paid and amounts collected from patients and caregivers in the electronic tracking system.

The inventory protocols require all inventories and inventory audit records to be retained as part of recordkeeping policies and to ensure oversight of facility management and personnel, in compliance with 935 CMR 500. As part of this comprehensive recordkeeping plan, HHG will maintain critical business operations including:

- Inventory tracking, from purchase order to sale
- Human resources data for all employees
- Access Control System records
- Transaction records
- Standard Operating Procedure Compliance
- Recall procedures and documents pertaining to recall actions; and <sup>(L)</sup><sub>(SEP)</sub>
- Waste management, specifically including records of marijuana <sup>(L)</sup><sub>(SEP)</sub> products destroyed at the dispensary <sup>(L)</sup><sub>(SEP)</sub>


Keeping complete, detailed, and organized records of inventory and all dispensing transactions is critical to ensuring that patients receive the highest quality medicine in its purest forms.

## **ENTERPRISE RESOURCE PLANNING <sup>(L)</sup><sub>(SEP)</sub>**

HHG will utilize METRC's to track plant-based processes and the FolioGrow/GreenBits app for seed-to-sale software Enterprise Resource Planning ("ERP"). FolioGrow/GreenBits uses bank-level encryption to comprehensively manage all inventory and satisfies HIPAA-security standards.



METRC tracks every purchase of every product in inventory within the dispensary, both as active inventory and in back stock, every sale, in addition to tracking adult use marijuana waste or recalled products scheduled for return to grower/processors.

METRC supports real-time monitoring of inventory, along with sales totals and patient counts. The platform will allow authorized employees to track purchasing habits and accurately predict demand. The analysis of historical sales data and inventory trends will be 

effective for forecasting inventory needs. METRC's will be supplemented with iAuditor, an operational protocol application. iAuditor will remind personnel that it is time for an inventory audit or a sanitation and safety inspection, provide a digital checklist and form to conduct the audit, then archive the audit the checklists, forms, and details.

Business management platform data and records will be stored electronically and be subject to electronic backup requirements. However, employees will be required to adhere to the same recordkeeping policies and procedures for printed, hand-written, or other analog records.

#### **ACTIVE AND INACTIVE RECORDS / RETENTION PERIOD**

An active record is one that is needed for operations and is frequently used. An inactive record is not needed to operate the business and is preserved until the expiration of its retention period. Unless specifically exempted, all records will be deemed inactive 180 days after their last use.

HHG applies a four (4)-year retention period to all records including the video files from the surveillance cameras and the records of physical access controls (for example, the daily log showing which employees used their identification credentials to open which doors). At the conclusion of the retention period, HHG will determine, on a case-by-case basis, whether certain categories of inactive records should be destroyed or preserved.

#### **DIGITAL RECORDS**

METRC utilizes proprietary programming and computer coding. The data records are stored in the cloud and are indecipherable without METRC decoding. HHG bears the responsibility archive its records in durable and "portable" formats that can be used without the METRC platform.

At the conclusion of each business day, a dispensary manager downloads a daily report in a Portable Data File (.pdf) capturing all the day's activities and operations, including all transactions with patients and vendors. Also, a dispensary manager will upload the daily report to the company's server, in a secure file that can only be accessed by either of the Executive Officers.



## **ACCESS CONTROL**

A dispensary employee's access to METRC and dispensary records is defined by the employee's job function; this is commonly known as Role-Based Access Control. For instance, a patient-facing dispensary technician will have access to patient records; inventory managers will have access to inventory management records; security personnel will have access to visitor logs and stored surveillance system files.

Each employee, manager, and executive will have unique log-in credentials consisting of a unique username and password. Logs of users logging into METRC will be archived to establish accountability records.

## **ADULT USE MARIJUANA PRODUCT INVENTORY RECORDS**

HHG will create and maintain written and electronic records of all inventories and include the date of the inventory, a summary of findings, and the employee identification numbers and titles or positions of the individuals who conducted the inventory review. To ensure the proper management of inventory, all items that enter and leave company facilities will be tracked, monitored, and systematically arranged.

Through employee training, the company will create a thorough understanding of both the electronic tracking system and the business management platform. By preparing employees to input accurate data daily, HHG can ensure the tracking system and business management platforms match and reflect the correct acquisitions, sales, waste and losses. Adult use marijuana products will be received and logged into inventory METRC as a lot, batch, or grouping of products. The inventory will be placed into a product storage bin/container and identified as back stock or ready-for-sale, active inventory. Only active inventory batches, lots, or groups will be used to fulfill orders from patients and caregivers.

## **ADULT USE MARIJUANA INVENTORY AUDITING (ACTIVE INVENTORY)**

Sellable inventory will be divided into two (2) separate types: active inventory and back stock. Active inventory is the inventory that will be utilized to stock the sales floor. Back stock will be the items that remain static in storage until active inventory is depleted and requires restocking.

## **RECEIPT AND SALE OF ADULT USE MARIJUANA**

All adult use marijuana products will be tracked and monitored in the electronic tracking system METRC and by physical inventory audits. Each activity associated with any adult use marijuana product will include a digital time, date, and location stamp within the Business Management Platform.



This timestamp will be used to produce a receipt that may be printed and made available to the Department, law enforcement, and company management. Data reflected on platform receipts will also be used to produce transport manifests as required by. Included in auditing procedures is the accurate documentation of transportation dates, approximate times of departure/arrival, transport vehicle specification, delivery route information, and other data that may pertain to the successful tracking and monitoring of company inventory.

Inventory procedures include counting, storage, and facilitating of funds transferred to and from HHG. Funds will be managed by employees trained to receive, deliver, count, sort, document, and securely store cash, checks, and other methods of payment. Money will be accounted for and recorded via multilevel auditing and secure accounting procedures. Funds will be counted and temporarily stored in lockable bank bags in the safe or vault area of the facility until the funds are safely transferred to the next individual, as defined in currency chain of custody procedures. Funds used for the purchase of adult use marijuana products will be linked to specific items, lots, and batches within our business management platform.

METRC will clearly demonstrate the exact products sold, the price of the items, methods of payment, and account details of other adult use marijuana organizations where funds were received or paid. Receipts of purchases and sales will be made readily available to adult use marijuana organizations, law enforcement officials, and the Department. Receipts will be observed for their accurate reflection of the transfer of adult use marijuana products and funds as part of daily sales and inventory reports.

Receipts for sale of cannabis-based products produced in the outdoor cultivation area will be check. HHG will not accept or process cash or credit card for the sale of the initial outdoor cultivation harvest. All checks will be deposited in Century Bank.

## **RECORDKEEPING OF TRANSPORT**

HHG will keep detailed records of all transport of adult use marijuana products, including:

- Transport Manifests
- Receipts
- Invoices
- Bills of Lading
- Shipping Invoices
- Packing Slips or any other shipping documents



## **ACCOUNTING DATA**

HHG is committed to the transparency of accounting data and adhering to Generally Accepted Accounting Principles (GAAP) in financial reporting. To achieve this goal, the company has contracted with an accountant, M. Jackson Accounting and Bookkeeping LLC, who will provide HHG a wide range of tax, accounting, audit, business advisory, planning, payroll and support services to manage company financials and reporting. In addition, we have brought on an inhouse office manager and a corporate accountant that is acquainted with IRS chapter 280E. All financial records will be maintained on secure, internal computer networks and will be duplicated using the electronic records backup system, ensuring HHG will never experience a catastrophic loss of financial data.

The following business records shall be maintained within our ERP pursuant to 935 CMR 500:

- Assets & Liabilities
- Monetary transactions
- Books of accounts / Chart of accounts
- Sales records
- Salary and wages paid to each employee

## **APPROVED VENDORS**

Sourcing the most qualified and effective vendors to service all aspects of operations, especially facility security and equipment maintenance, is imperative to successfully serving the patients of the Commonwealth. Only owners, principals, and designated employees will be permitted to enter into business contracts on behalf of HHG. They will be required to ensure vendors register with the company and are designated as an approved vendor by the Department, prior to providing goods or services. Completed vendor records, W-9 forms, and all other accounting records will be maintained by accounting personnel in compliance with IRS and any other regulatory requirements.

A list of approved vendors will be kept on site for easy reference by the Dispensary Manager and management personnel. This list will include, but is not limited to, the following vendor types:

- Marijuana Transport
- Waste Disposal
- Pest Management
- Security System Service & Repair
- Security Firm



- IT Firm
- Software Technical Support
- Facility Services

## **EMPLOYEE RECORDS**

The Human Resources department will be required to maintain accurate personnel records for each employee. Such records must be maintained for at least four (4) years and include:

- All materials submitted to the Department
- Completed IRS W-4 Form
- A copy of their Employee ID
- Documentation of verification of references
- The job description or employment contract that includes a description of duties, authority, responsibilities, qualifications, <sup>SEP</sup>and supervision
- Documentation of all training & in-service received by the <sup>SEP</sup>employee and the signed statement of the employee indicating the date, time, and place the training was received, and the topics discussed, including the name and title of presenters
- Attendance records
- Records of any relevant professional licensure issued by a <sup>SEP</sup>regulatory agency and verification of education requirements for licensure
- Documentation of periodic performance evaluations
- A record of any disciplinary action taken <sup>SEP</sup>
- Exit Interviews

## **COMPENSATION RECORDS**

The Human Resources Department will maintain records documenting the salary and wages paid to each employee, stipend paid to each executive manager, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with HHG, including executive managers.



## PLAN TO RESTRICT ACCESS TO 21 YEARS OF AGE

HHG Inc., is committed to the responsible dispensing of cannabis to responsible consumers by employees and registered agents who are required to be 21 years or older. 935 CMR 500.030 & 501.030. The company is also committed to actions that will help reduce illegal purchasing and consumption. Accordingly, all employees are required to follow these procedures: No employee will serve any adult use customer under 21 years of age (under 18 in the case of registered patients) or to any person who is visibly intoxicated.

In order to enter the facility, customers, patients and visitors are required to present documentation that verifies their age, and for customers/patients again at the point of sale to comply with regulations at 935 CMR 500.105(1)(q) & 501.105(1)(q).

If a customer is younger than 21 years old but older than 18 years old, they shall not be admitted unless they produce an active medical registration card issued by the CCC and proof of identification as a qualifying patient under 935 CMR 500.002 & 501.002. If an individual is younger than 18 years old, they shall not be admitted unless they produce an active medical registration card **AND** they are accompanied by a personal caregiver with an active medical registration card and proof of identification.

Acceptable documentation is a valid driver's license or passport with photo or photo identification, showing date of birth issued by a governmental body; The employee will check the identification to ascertain that it is authentic. Any appearance of forgery or tampering is brought to the Dispensary Manager's attention; In the absence of authentic identification, or in case of doubt, the employee will refuse service to the customer. Any adult use customer or patient determined to have purchased his or her limit will be refused service accordingly. It is likewise the employee's responsibility to notify the Manager and/or supervisor immediately when a customer shows visible signs of intoxication. After refusing service to any customer, employees will note the name, appearance and clothing of the individual involved. This information will be given to the Dispensary Manager and logged appropriately for future reference; No employee will "freely dispense" and all products are dispensed in measured quantities. 935 CMR 500.140(3) & (4); 501.140(3) & (4).

In order for each employee to feel comfortable and confident with the above procedures, all employees who dispense cannabis participate in a designated cannabis dispensing/handling awareness-training program at the beginning of employment. Additionally, employees are required to complete, at minimum, annual cannabis dispensing awareness training; supplementary trainings will be scheduled accordingly in the event of a policy/procedure change or an update to the laws and regulations surrounding the medical or adult-use cannabis programs.



## **QUALIFICATIONS AND INTENDED TRAINING**

The Director of Compliance, in coordination with the HR department, must ensure that all employees receive proper training and education regarding compliance, as well as the healing and medicinal benefits cannabis provides. Pursuant to CCC regulations at 935 CMR 500.105(2) all HHG employees will be required to receive at least 8 hours of ongoing training annually.

### **RESPONSIBLE VENDOR TRAINING – BASIC CORE CURRICULUM**

All HHG employees handling product, owners and board members are required to take the Responsible Vendor Training Program by an organization certified by the CCC. Upon all necessary employees' successfully completing the responsible vendor program HHG will be designated a "responsible vendor."

Once HHG is designated a "responsible vendor," all new employees involved in the handling and sale of marijuana shall successfully complete the responsible vendor program within 90 days of hire. After initial successful completion of a responsible vendor program, each owner, manager, and employee involved in the handling and sale of marijuana for adult use shall complete the program once every year thereafter to maintain designation as a "responsible vendor."

Administrative employees who do not handle or sell marijuana may take the "responsible vendor" program on a voluntary basis. HHG will maintain records of responsible vendor training program compliance for four years and make them available for inspection by the CCC and any other applicable licensing authority upon request during normal business hours.

### **RESPONSIBLE VENDOR TRAINING – ADVANCED AND DELIVERY CORE CURRICULUM**

Where applicable, HHG will take advantage of advanced and delivery core curriculum programs as they are approved by the CCC and made available via the Company's registered responsible vendor training provider(s).

## **OTHER TRAININGS**

In addition to responsible vendor training, HHG will conduct additional trainings inhouse utilizing HHG staff and external vendors as appropriate. The training each employee receives will be based on their job function. Agents who are registered under multiple licenses will receive all trainings required to operate for each license they are registered under. Potential trainings include:

### *DIVERSITY TRAINING*

As committed to in HHG's diversity plan, all members of management will take diversity training via a third-party vendor or via the Advanced Core Curriculum of Responsible Vendor Training.

### *HEAVY EQUIPMENT TRAINING*

Employees who will operate heavy equipment (forklift, skyjack, etc.) will receive training from HHG managers or a 3<sup>rd</sup> party vendor in the safe operation of said equipment.



#### ***PATIENT CONFIDENTIALITY REQUIREMENTS***

Educational materials explaining HIPAA's rules for the confidentiality of patient information will be provided via a combination of internal and responsible vendor training.

#### ***DISPENSARY TRAINING***

Each dispensary employee will receive full training on understanding the difference between e.g. topical products, edible cannabis products and cannabis-infused products, as applicable to the operations of facility. In addition, the dispensary staff will be familiarized with procedures used by HHG to produce edible cannabis products or cannabis-infused products. Training will include the proper procedures for handling edible cannabis products or cannabis-infused products.

HHG's dispensary staff will be trained to educate patients and customers about HHG products.

#### ***FIT FOR USE***

Dispensary Manager will teach employees to sell fit-for-use cannabis products: cannabis products designed and created with specific customer or patient conditions in mind. Topics include cannabinoids, methods of administration, dosages, strains and each product available for sale at the dispensary.

#### ***REGULATORY INSPECTION PREPAREDNESS AND LAW-ENFORCEMENT INTERACTION***

All employees will be informed on how to prepare for inspections by CCC inspection staff and how to document and report any loss or theft of cannabis from the dispensary to the appropriate regulatory agency.

#### ***SECURITY PROCEDURES***

Instruction on the use of the security key cards and the electronic, access-controlled doors; the locations of surveillance cameras; opening and closing procedures; regulatory agency security regulations; the locations of silent duress alarms; procedures regarding restricted and limited access areas.

#### ***EMERGENCY RESPONSE***

Employees will be provided a copy of the HHG's emergency response plan for crises that could affect the security or operation of the dispensary in the event of strike, fire, flood or other natural disaster or other situations of local, State or national emergency. Instruction on the locations of all the hardwired, emergency-police call devices; the locations of the phone lists with all the emergency-response numbers, including fire, law enforcement and the executive team.

#### ***ServSafe***

Required HHG employees will receive ServSafe training from a certified vendor.

#### ***RECORD KEEPING***

The HR department will maintain training records for all employees and keep these records for at least 4 years. All training records will be available for inspection by the CCC or regulatory authorities upon request.



## **PERSONNEL POLICIES**

The HHG Staffing and Training Plan details the processes the Human Resource Manager will use to manage human resources to provide the highest quality service and education to patients while acting in compliance with CCC regulations. The Human Resource Manager is assigned responsibility for maintaining and updating the Plan, which will ensure that HHG has sufficient staff possessing the correct skill sets, and experience needed to ensure the success of all operations.

HHG encourages personal growth, development and empowerment for its employees. All employees are encouraged to provide input and suggest new policies and processes.

## **CONFIDENTIAL DATA STORAGE**

Employee data will be stored in Microsoft Azure via Office 365's SharePoint document management system. Data stored within the Microsoft cloud is secured with HIPPA compliant security protocols.

All employee data will be entered directly into Office 365 through an internet browser using Secure Socket Layer ("SSL") connections. All SSL connections are established using 2048-bit keys.

Once data has reached Office 365 it will be encrypted with BitLocker which uses Advanced Encryption Standard with 256-bit keys.

## **FAIR EMPLOYMENT PRACTICES POLICY**

HHG is committed to providing all employees with a safe, healthy and economically beneficial working environment. Workplace safety and environmental standards are of utmost concern to HHG, as the welfare of our employees impacts our ability to operate successfully.

Fair employment practices, including the prohibition against all forms of illegal discrimination, will be prioritized and enforced at all times through HHG codes of conduct. All HHG employees will receive access to generous benefits packages and rates of compensation that exceed state minimum standards. By providing equal access and fair treatment to all employees we will improve HHG success while enhancing the progress of individuals and the community in which our business operates.

## **COMPENSATION STANDARDS AND TIME OFF**



The standard HHG workweek is 40 hours of work. Overtime compensation is paid to non-exempt employees in accordance with federal and state wage and hour restrictions. Overtime is payable for all hours worked over 40 per week at a rate of one and one-half times the non-exempt employee's regular hourly rate.

Each employee's hourly wage or annual salary will be reviewed at least once each year. Increases will be determined by the ability of the HHG to financially support them based on performance, adherence to laws, HHG policies and procedures and the ability of employees to meet or exceed duties per job description and achieve performance goals.

HHG will provide all employees with competitive wages based upon position and tenure. Standard HHG wages range from \$15/hour to \$125k annually. By providing our employees with adequate compensation, we reinforce our commitment to investing in the progress of individuals and the establishment of a highly capable and experienced team. It is a goal of HHG to establish long-term employment opportunities for all employees.

HHG will offer its regular full-time employees paid vacation, the amount of time earned each year will be based on the employee's position and tenure.

Additionally, HHG will provide unpaid leave opportunities for all employees to care for the employee's child after birth or placement for adoption or foster care, to care for the employee's spouse, son, daughter or parent, who has a serious health condition, for a serious health condition that makes the employee unable to perform the employee's job and for a qualifying exigency or military caregiver leave, as described below

## **BENEFITS**

HHG is committed to providing a generous employee benefit program for all employees and agents. All HHG employees will have the opportunity to participate in a 401(k) plans and other types of retirement programs with a HHG funds match. Employees will also be presented with access to competitive health insurance programs and/or a health savings account (HSA) program for their entire family. 125 Flexible Spending Accounts will be established for participating employees, allowing participants to set aside pre-tax dollars to pay for certain types of expenses. HHG will establish access to three plans: (1) for medical expenses, (2) for dependent care expenses and (3) for certain commuting expenses. HHG will additionally provide employees with options for participating in long-term and short-term dental and vision coverage, disability insurance and life insurance programs.



The HHG Community Involvement Rewards program will provide employees with the ability to earn benefits-related credit through involvement in community-based initiatives such as volunteer work, participation in local mentorship programs and additional community service programs.

Additionally, when operations commence HHG plans to offer retirement and tuition reimbursement plans that benefit employee progression in the HHG.

Bonuses are variable, vary based on department, and not exceeding 5% of an individual's total yearly salary but could exceed that if dispensary sales can support it. Additionally, all bonuses are at management's discretion.

### **POTENTIAL EMPLOYEE SCREENING AND MONITORING**

It is critical for the security of HHG that only the most qualified, credible, talented and culturally diverse people are hired to help avoid workplace theft, fraud or violence.

It's equally important for the HHG to conduct background screening on the contingent workers, including cleaning crews, facilities maintenance workers, auditors and other contractors who have access to the HHG's property or represent the HHG. Knowing the background of these workers is required to protect the integrity of the HHG, as well as the safety of customers. Therefore, this workforce needs to be screened with the same due diligence as any other employee.

To help attract, hire, land and retain the best employees the HHG has developed employment screening and monitoring processes to create a candidate experience that benefits potential employees and reduce HHG risk by utilizing a fast, scalable and compliant background screening solution. An efficient, thorough employment screening process can, above all else, help reduce the HHG's overall workplace risk. Identifying risk early, prior to hiring an employee, protects the organization from risk related to physical safety, financial security organizational image or reputation and legal compliance.

### **COMPLIANCE**

The Human Resources Manager will ensure compliance with local, state and federal laws regarding the hiring and employment screening processes. The most prominent legislation that HHG must abide by is the Fair Credit Reporting Act ("FCRA").

### **PRE-SCREENING POTENTIAL CANDIDATES**



The Human Resources Manager will pre-screen candidates by stating clearly to potential applicants what items and prerequisites will be needed to properly qualify the employment application. This will streamline HHG's application process by having applicants review the information and then determine whether or not they meet the qualifications. This is part of the proactive pre-screening process that ensures applicants who submit their information will pre-qualify based on the specific information needed later in the process.

HHG 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 a 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.

### **CRIMINAL HISTORY**

HHG will screen candidates for criminal records to promote a safe, secure workplace by reducing employment-related risk linked to a criminal history. The following searches may be performed depending upon the type of position the candidate is seeking.

#### ***Member-Contributory Theft Information Database***

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

#### ***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 are 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.

#### ***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.



### ***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 responsibility for HHG, including those who will not only drive an HHG vehicle but will also drive a personal vehicle on HHG time or for HHG purposes.

### **VERIFICATION AND QUALIFICATION SOLUTIONS**

The Human Resources Manager may potentially utilize the following solutions depending on the level of security required for the position.

### ***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.

### ***Credit Check***

This search matches the candidate's information to information held by the Credit Bureaus and returns the candidate's credit report.

### ***Employment and/or Education Verification***

These two products are used to verify the information provided by the candidate.

### ***Employment Eligibility***

An employment eligibility verification service will be used to streamline the Form I-9 process. The HHG will participate in the E-Verify program to confirm every new hire's employment eligibility by sending the information used to complete the I-9 through the Social Security Administration (SSA) and Department of Homeland Security (DHS) databases.

### **SUBSTANCE FREE WORKPLACE**

HHG will strive for maintaining a safe working environment. In order to keep employees and customers safe HHG will have alcohol, smoke, and drug-free workplace policies in place pursuant to CCC regulation 935 CMR 500.105. Employees will be required to be sober while within the facility. Employees and managers will be required to immediately report any incidents involving alcohol, smoke and drugs to the Human Resources manager



## **OCCUPATIONAL AND BIOMETRIC SERVICES**

HHG will utilize a drug testing service provider who will track results, provide reports and ensure HHG stays in compliance with the CCC agency regulations. The service provider will assist HHG in developing or updating drug testing policies, coordinate and store Driver Qualification Verification files and meet immunization and medical exam requirements including receiving the exam results

A basic DOT Five Panel Drug Test (urine conventional) will be used. The following drugs will be tested from the applicant's urine sample: amphetamines (amphetamine and methamphetamine), benzoylecgonine (cocaine metabolite), opiates (codeine and morphine) and phencyclidine (PCP).

## **ADJUDICATION AND ALERTS**

HHG will provide a criminal records adjudication policy as part of the screening process. FCRA-mandated Adverse Action letters for candidates that fail to meet specific screening criteria set forth by the organization will be delivered to candidates.

## **MONITORING**

A Monthly Compliance Exception Report is completed for the employment screening process. The report informs the Human Resources Manager which candidates have completed various parts of the screening process, and which have not. The report also updates HHG to which components are missing from a candidate's employment screening process.

The Human Resources Manager will cause all required criminal and drug screens to be updated every two years. All employees are required to notify HHG whenever they have any encounter with law enforcement. The Human Resources Manager will determine if a Level 2 background screening should be performed upon the employee's notice. A post-accident drug screening may be performed at the Human Resources Manager's discretion or if required for worker's compensation purposes.

## **STAKEHOLDER FEEDBACK**

The Human Resources Manager in coordination with the Chief Operations Manager, and Chief Financial Officer will solicit and record feedback from customers, vendors, consultants, community members and groups, law enforcement and other interested parties about the competence of HHG and our staff. Feedback requested from stakeholder should address the quality of interactions with employees, any changes in HHG policies or procedures directly affecting the stakeholder and the effectiveness of the HHG overall.



## **OBSERVATION AND PERFORMANCE REVIEW**

To evaluate the effectiveness of training through observation of employee performance, these evaluations should consider employee's adoption of policies, procedures, concepts and attitudes presented in the training for new employees; level of improvement, drive or lack thereof toward improvement in the performance of **veteran employees**; adoption of the training topics in practice and how well they are working; department managers and trainer observations of employee attitudes, methods or competency and the level of discussion between employees and department managers regarding training topics presented on an ongoing basis.

## **STAFFING PLAN**

The staffing plan will develop in three phases which are hiring, training and professional development. Hiring of employees will only be done according to established procedure when a position in the employment structure is open or management determines a new position should be created. The training will provide policies and procedures to be reviewed at length. Professional development practices will then supplement this initial training. The training and professional development will ensure that all HHG staff grasp and comprehend the policies, procedures and relevant regulations to abide by for operations at the facility.

HHG will make sure that the best candidates are hired in a process that eliminates racial and socioeconomic biases.

## **STAFF ACQUISITION PROCESS**

1. Identification of need
2. Job classification and job description preparation
3. Solicitation of the vacant position utilizing the methods that best fit the position
4. Reviewing resumes on qualified candidate
5. Performing and recording reference checks on qualified candidates
6. Scheduling first interviews with the Human Resources Manager
7. Scheduling second interviews with strong candidate with the HR Manager and department hiring manager
8. Delivery of an offer letter to the first-choice candidate
9. Performing criminal background check on selected candidate
10. Send application to the state for registration with the CCC
11. Completion of the probationary period



The Staffing and Training Plan is based on business plan assumptions and best practices and may be adjusted by in accordance with actual operating needs.

It is our policy to ensure that all employees receive professional and appropriate training on compliance with regulatory agency regulations, the therapeutic use of cannabis, safety, security, incident management and diversion and theft prevention.

## **HIRING**

HHG's Human Resource Manager will coordinate with management to acquire all staff. The acquisition process may vary depending on the vacant position and special circumstances. The acquisition process will be managed by the Human Resource Manager and will always include:

- performing a criminal background check on the selected candidate to determine eligibility for Cannabis Control Commission registration
- application to Cannabis Control Commission
- new hire orientation and training only upon successful registration
- completion of the probationary period

HHG upon receiving interest from any potential employee provides an application which helps identify the company's hiring targets; including primarily individuals who identify as members from a community of disproportionate impact, and residents of the company's host community. All staff and Managers must nevertheless comply with all EEOC guidelines when managing employee issues. None of our policies or practices discriminate based on or conflict with laws regarding the following: race, height, weight, credit rating or economic status, religious affiliation or beliefs, citizenship, marital status and number of children, gender, arrest and conviction, security/background checks for certain religious or ethnic groups, disability, or medical questions and examinations. Positions will only be filled according to the established protocols:

### ***Background Check***

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 employee is or will soon be licensed as a cannabis employee and thus allowed to work in the facility. The investigation will be conducted to ensure the potential employee does not have any felony convictions which would bar them from employment. The investigation will also check for any crimes of moral turpitude, whether misdemeanor or felony. Any indication of past crimes of moral turpitude will be a bar to employment. Once the applicant is determined to have passed a background check, a first interview will be initiated.



### ***1st Interview***

The first interview will consist of a face-to-face meeting with the Manager of the department the applicant is interviewing for a position in. The purpose of this interview will be to help determine any potential employee's:

- 1) level of knowledge regarding cannabis operations
- 2) existing skill set relevant to the duties of the job offered
- 3) their capacity to learn new skills and grasp concepts (specifically regulatory concepts)
- 4) potential for deception as an employee

At least 2 references will be contacted, and details of the interview confirmed. A solid background (or an appropriate level of education/experience pertaining to the position offered), a clean record and indicia of honesty will be requisites for the second interview

### ***Final Interview***

The final interview will be conducted by management. The management will ask a variety of questions intended to assess the applicant's ability to interact with others and work according to HHG's policies. The final decision will be made by management with input from the department manager who conducted the first interview. For management positions, the ownership and/or senior management will jointly conduct the final interview with the department manager retaining the final decision after consulting with managing members.

## **TRAINING**

All new hires will be required to go through a training period. Potential employees will be advised of all employment policies, the life cycle of cannabis and its growth process and the proper procedures to employ while performing their duties. Educational training will consist of presentations given by the department manager. The presentations will be supplemented with hands on training to demonstrate the material included in the presentations. All employees will go through additional training with their Manager based on the employment role.

Being in an industry that is constantly changing requires companies to be aware of recent market developments and trends throughout the industry. HHG takes a proactive approach to continually provide progressive training and interactive learning to our employees. This is conducted both at the individual facilities by certified HHG trainers, but also electronically and telephonically when necessary.



By exposing employees to constant training and developments, HHG values its employees and encourages their retention with HHG.

By training employees, it allows them from day one to have the ability to learn processes and procedures in order to take on additional responsibilities throughout the course of their employment with HHG. With the ability to grow within HHG and move at their own pace, HHG encourages retention of all employees.

Our collaborative training program is designed to educate employees on best practices for maintaining their personal safety and the safety of HHG products, including comprehensive emergency and incident management training. Training sessions may include virtual web collaborations, onsite experience and OSHA Occupational Safety Training.

### ***HHG Employee Training***

No HHG employee or consultant may work on-site prior to receiving orientation training or when any required critical training is eight weeks or more past due. The HR Manager will provide all relevant and adequate training for each individual involved in HHG operations. Training will be 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 agency regulations as well as Federal statutes regarding the use of cannabis. Each employee will receive a minimum of eight hours of ongoing training annually or as deemed necessary by HHG Managers.

### ***Module Based Training***

HHG employs a strategy of module-based training. Each module will cover a single topic in -depth.

Training modules include:

1. New employee orientation
2. Train the trainer
3. Monthly department meetings
4. Compliance, regulation and law
5. Confidentiality
6. Safety
7. Security



8. Emergency and incident management
9. Inventory management and diversion prevention
10. Cannabis science
11. Community and customer relations
12. Recordkeeping
13. Product handling and sanitation
14. Transportation

HHG may develop and implement new modules as deemed necessary. General employee training will largely be department focused and relevant to the operational processes each employee will follow on a daily basis. HHG will reassess all modules annually in order to determine if the updated training is necessary to maintain a compliant operation.

### ***Training Evaluation***

In order to achieve the high standards of quality, efficiency and compliance HHG sets forth, the Human Resources Manager shall evaluate the training program annually. Based on the results of this evaluation, the HR Manager will implement any necessary changes and determine the need for re-training of staff. The Chief Executive Officer, Chief Financial Officer and Chief Operations Officer must approve any major training program changes. HHG cannabis science training must address the endocannabinoid system, clinical trial information, efficacy and dosing, strains and genetics, methods of use and types of products, condition management and side effects.

The Human Resources Manager will solicit and record feedback on the quality and efficacy of a training module from employees that received the training. Feedback may be solicited utilizing post training group discussions, individual interviews and anonymous surveys

### ***Oversight***

The management structure assigns responsibility for the different aspects of operation to individual Managers and staff so that every employee on every level will be accountable to a higher position. Each department has defined responsibilities and must report to management on a weekly basis regarding the duties they were assigned and progress. The Operations and Management Practices Plan outlines the entire process and procedures to employ. The plan also defines the employment structure and the relation of employment policies to operations. The manual details the administrative processes to be employed in various situations, including disciplining employees. All discipline will be handed down by



the department manager or HR Manager to help keep relations between department Managers and ground level employees smooth.

### ***Employee Manual***

Upon licensing and commence of operations, all HHG Staff will undergo a mandatory training period. During the first day of training, an employment manual will be issued to employees. The Employment manual will set forth HHG policy regarding administrative matters, including terms of employment, what is expected of employees and procedures for discipline. Each employee must read through the manual and sign a contract acknowledging they have received, read and understand the HHG policies.

### ***Operations Manual***

The second stage of training will be an educational portion regarding cannabis and procedures. The manual will begin with a background of commercial cannabis, identify relevant legal regulations, break down the HHG structure/roles of employees and set forth Standard Operating Procedures for each phase of operation.

Standard Operating Procedures will provide a detailed breakdown of the duties (what), methods (how) and schedule (when) by which each employee will perform the tasks of their respective positions. The HR Manager will develop training curriculum to educate new employees. Managers will be actively training the new employees on the tasks expected of them and answering questions. At the end of the training period, the prospective employees will be given a short test regarding the policies and procedures, passage of which is a prerequisite for employment.

## **SYSTEMS TRAINING**

### ***Inventory System***

The HR Manager and department managers will be responsible for developing and conducting training programs for each employee who will be using the METRC software. METRC representatives offer online training for HHG's management team in the various uses of the software and provide training manuals and other materials to assist in training employees. All General Management and Managers will be responsible for knowing how to properly operate the METRC software.

## **EMERGENCY TRAINING**

Fully operational, the operating hours of the cultivation facility will be 24/7. The operating hours for the dispensaries will typically be 11 hours a day, 7 days a week. A limited number of employees will be necessary for nights and weekends, but operations will continue. At least one Security Officer will be on-site during all opening hours of the cultivation center and the dispensary. Security will be hired in-house



and via a police detail as needed. All employees employed by HHG will go through a security training/debriefing with security regarding the features of the facility, the role of security in operations and procedures in case of an emergency.

In the case of an emergency, employees will have several methods for contacting local law enforcement. The most common will be immediate referral to on-site security personnel. Security personnel have been hired to provide such services. In the event security is not immediately reachable, staff will be trained to alert local authorities. In no event should an employee attempt to handle or confront an emergency situation. All matters should be referred to security or local law enforcement.

Each new hire will begin work on a three-month trial period of employment. At the end of the three months the department manager will conduct an assessment of the employee's performance.

#### **FOOD HANDLING**

All employees whose job includes contact with cannabis products (edible or otherwise), including cultivation, production or packaging must be trained in food handling requirements found in applicable laws and regulatory agency regulations.

#### **INVENTORY LOSS OR IRREGULARITIES AND REPORTING TRAINING**

Operational policies will restrict employee access to areas where they have legitimate work tasks. All areas where cannabis is stored will be locked and monitored via Closed Circuit Television. The background checks and hiring process will weed out applicants with criminal or amoral histories. Employment policies will outline the consequences of employee theft and the security briefing will make employees aware of the seriousness of the matter. Cumulatively, these policies will assist in preventing employee theft of cannabis, cannabis product or growing materials.

All staff is responsible for notifying the agent-in-charge of any loss or theft of cannabis from the facility so that they can promptly document and report the loss or theft to the appropriate manager and the regulatory agency. Employees will have a whistleblower policy in place to ease the concerns of any employees who suspect diversion of cannabis or cannabis products from the facility by another employee. The report will also be submitted to the Compliance Officer for further review and investigation.

#### **PROFESSIONAL DEVELOPMENT**

The purpose of the professional development stage is to provide continued education to HHG employees regarding new operational methods, changes in rules/regulations and innovations in



techniques. HHG will evolve with the industry, embracing new technologies or processes that increase efficiency. The results will be reported to the HR Manager where necessary to determine if a promotion, raise, demotion or termination is warranted.

Every three months, department managers will evaluate employee performance. The results will be reported to the HR Manager. When necessary, the CEO, CFO, and COO will be consulted to decide if a promotion, raise, demotion or termination is warranted. Training will be used to address any deficient performance and educate the employee about the proper methods to use.

Hands-on instructional training to address any problems in technique or method by which an employee is performing a task.

Group meetings to ensure all employees are communicating and aware of any changes. Each department will hold group meetings on a weekly basis. The entire facility will meet as a group at least once a month to address the state of affairs.

#### **PLANS FOR RETENTION OF KEY EMPLOYEES**

HHG takes retention of its staff very seriously. HHG recognizes the value its employees bring to the HHG and works diligently to maintain a positive and supportive work environment for employees. With the vertical business integration comes numerous opportunities for employees to grow and flourish within the HHG company. Employees will have the option of working and learning about cultivation, retail, manufacturing and processing through our work share initiative.

Being in an industry that is constantly changing requires companies to be aware of recent market developments and trends throughout the industry. HHG takes a proactive approach to continually provide progressive training and interactive learning to our employees. This is conducted both at the individual facilities HHG trainers, but also electronically and telephonically when necessary. By exposing employees to constant training and developments, HHG values its employees and encourages their retention with the HHG.

By training employees, it allows them from day one to have the ability to learn processes and procedures in order to take on additional responsibilities throughout the course of their employment with the HHG. With the ability to grow within the HHG and move at your own pace, HHG encourages retention of all employees.

However, as with any industry, there is turnover of employees. By proactively and



progressively training existing employees, HHG ensures that if there is turnover of employees, we can quickly staff the position in a manner that creates minimal to no disruption to our clients, their facilities and their production levels.

## **REPORTING STRUCTURE**

Each department manager is responsible for ongoing performance evaluations, performance issues and recognition, promotions and disciplinary actions in their department. Managers are required to communicate all necessary information on employee performance to the HR Manager as often as necessary. Managers are required to complete formal performance reviews annually and at the end of any probationary period.

## **HHG JOB DESCRIPTIONS**

### ***CHIEF OPERATIONS OFFICER***

Experience managing a cannabis facility or other type healthcare facility preferably with a retail and/or regulatory component; analytically and socially intelligent; able to take responsibility for the company while maintaining a problem-solving, vision-based attitude; legal and financial knowledge; simultaneous focus on short- and long-term goals and ability to identify and respond to problems quickly and appropriately.

### ***CHIEF MEDICAL OFFICER***

Ability to research and analyze new cannabis science; previous experience as medical director for a non-profit or alternative health care facility; ability to identify training and informational deficiencies and respond by implementing specific measures to counter these inadequacies; and ability to develop informational materials and training for staff and patients.

### ***CHIEF FINANCIAL OFFICER***

Experience managing finances for a cannabis facility or other type production business preferably with a retail and/or regulatory component; analytically and socially intelligent; able to take responsibility for the company while maintaining a problem-solving, vision-based attitude; legal and financial knowledge; simultaneous focus on short- and long-term goals and ability to identify and respond to problems quickly and appropriately.

### ***HUMAN RESOURCES MANAGER***



Prepares HHG handbooks and job duties. Keeps all employee files and records and is in charge of all hiring, termination and employee reviews. Ensures operations and staff are compliant with state and local regulations.

Must have past experience managing employee relations, adhering to compliance and drafting standardize company policy. Ability to draft implement measures correcting HHG needs.

### ***COMPLIANCE MANAGER***

Drafts and monitors all compliance procedures. Continually reconciles and monitors cannabis inventory to maintain full compliance with regulatory agency regulations. Maintains communication with all state and local law enforcement and regulatory agencies in order to ensure complete compliances.

Must have extensive knowledge of regulatory agency regulations and continual compliance training. Has extensive knowledge of all regulatory agency regulations pertaining to cannabis and maintains relationships with local municipalities and enforcement.

Excellent analytical skills and ability to comprehend complex legislature and apply implications on operations as well as strong communications skills are required to maintain dialog and relationships with state department officials, law enforcement, landlords, city personnel, as well as management.

### ***SECURITY OFFICER***

Demonstrated experience in a security management role; able to develop and manage security protocols in accordance with HHG policies and able to identify and respond to breaches in security or dangerous situations. Must have knowledge of cannabis policy and law and be able to provide security for transportation and delivery services.

### ***QUALITY CONTROL MANAGER***

Demonstrated management experience in a quality control program; experience performing laboratory testing and scientific research; demonstrated experience in a position requiring critical-thinking, problem-solving, planning and assessment; experience in a product withdrawal or recall situation; knowledge of cannabis science and testing methods; and knowledge of cannabis policy and law.

### ***DIRECTOR OF CULTIVATION***



Demonstrated experience managing employees and cultivation and business operations; demonstrated experience in a position requiring critical-thinking, problem-solving, planning and assessment; computer literacy in word processing, METRC and database management; and knowledge of cannabis policy and law.

#### **TERMINATION OF EMPLOYEES**

HHG will terminate any employee or registered agent that violates the following:

- Diverted marijuana, which shall be reported to law enforcement officials and to the Commission
- Engaged in unsafe practices with regard to operation of the Marijuana Establishment, which shall be reported to the Commission
- 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

The Executive team, management team, security team and HR team will decide who will be terminated and coordinate the immediate removal of said employee from the facility.



## **RECORD KEEPING POLICIES**

HHG has developed and adopted procedures for maintaining records that conform to cannabis regulations and best practice for the cannabis and pharmaceutical sectors. HHG maintains a detailed description of plans, procedures and systems adopted and maintained for tracking, record keeping, record retention and surveillance systems, relating to all cannabis at every stage including cultivating, possession of cannabis, delivery, transporting, distributing, sale and dispensing by the proposed licensed organization and shall maintain records required for a period of five years and make these records available to the regulatory agency upon request.

HHG will ensure compliance with all laws and regulations pertaining to its operation as a licensed organization including recordkeeping. However, the operational needs of HHG necessitates records in excess of the mandated requirements. HHG's record keeping policies and procedures as detailed in this section and throughout the Standard Operating Procedures demonstrate not only compliance with legal and the CCC regulatory requirements, but a commitment to full documentation and transparency in all of HHG's operations.

HHG maintains strict control over records in order to provide operating data to management, information to advisors and board members, document operations for third- party certifiers or auditors and to maintain a record of operations in case of any insurance claims, legal or administrative investigation.

The Chief Operating Officer shall oversee all record retention protocols of HHG. The Chief Executive Officer is responsible for oversight of the Chief Operating Officer and all record maintenance activities. The HR Manager must supervise the recordkeeping activities in their operating unit to ensure compliance with HHG policies and procedures.

## **COMPLIANCE WITH REGULATIONS**

HHG is committed to compliance with all laws and regulations pertaining to its operation as a registered organization. HHG will make it's all records available to the CCC or its authorized representatives upon request for monitoring, on-site inspection and audit purposes. Several regulations apply to recordkeeping functions. HHG's recordkeeping policies and procedures demonstrate not only compliance with the Massachusetts requirements but also a commitment to full documentation of HHG's operations.

## **HHG RECORD KEEPING REQUIREMENTS**

The Chief Operating Officer with assistance from the Software Systems Analyst is responsible for recordkeeping, data retention and back-ups to ensure HHG maintains true, complete and accurate records. The Chief Operating Officer is also responsible for the proper integration of those requirements into policies and procedures. Back-ups of all records must be maintained for a recommended of five years. All employees must adhere to recordkeeping policies and procedures unique to their department as a condition of employment. The Chief Operating Officer must authorize the release of any records to



a third-party and must report the disclosure of records to the Chief Executive Officer to determine if legal counsel should be notified.

HHG shall maintain, at a minimum, the following categories of records for three years minimum:

- Standard operating procedures
- Real time Inventory records including seed to sale tracking
- Confidential customer
- Dispensing history
  - All dispensed cannabis and periods of no-fill (zero report)
  - Dispensing errors
  - Allergy and adverse event reporting
  - Cannabis recalls

Additional record requirements include:

- Employee records and policies
- Waste disposal records
- Maintenance records
- HHG's assets and liabilities
- Fixed asset schedules
- Insurance and escrow requirements
- All monetary transactions
- Books of accounts including journals, ledgers and supporting documents, agreements, checks, invoices, vouchers, monthly and quarterly reports and annual audits
- Sales records
- Salary and wages paid to each employee
- Stipend paid to each executive manager and any executive compensation, bonus, benefit or item of value paid to any individual affiliated with HHG, including employees of HHG, if any
- All licensing documentation and other correspondence with the regulatory agency and all other corporate documents required by law including but not limited to meeting minutes, annual reports, stock or membership agreements



## RECORDKEEPING POLICIES

HHG has developed strict protocols for the maintenance of records and documents. In addition to HHG's legal obligation to protect customer information, HHG has a responsibility to its employees to accurately document the activities of the business. True and correct records maintained in a timely and organized manner also provides real-time operating information to management necessary to make quick and informed decisions in the normal course of business.

## PRODUCT INVENTORY <sup>[1]</sup><sub>[SEP]</sub>

Inventory records will be stored in accordance with CCC regulation 935 CMR 500.105(8) and 935 CMR 500.105(9). Inventory records will be held in the Office 365 SharePoint cloud environment and within the METRC software platform in accordance with CCC regulation 935 CMR 500.105(8)(e) and 935 CMR 500.105(9).

## ORGANIZATIONAL CLOSURE

In the event of closure, HHG proposed to the regulatory agency the procedures and actions the registered organization shall take to maintain and make available to the regulatory agency all records required to be maintained under this part for a recommended period of five years. <sup>[1]</sup><sub>[SEP]</sub>

## PRICING RECORDS

The regulatory agency or an authorized representative has the right to examine records that formed the basis for the proposed price, including the registered organization's books, records, documents and other types of factual information that will permit an adequate evaluation of the proposed price. The licensed HHG shall provide reasonable access to the regulatory agency of its facilities, books and records. <sup>[1]</sup><sub>[SEP]</sub>

## RECORDKEEPING SYSTEMS EQUIPMENT

HHG will acquire multiple information point of sale systems requiring hardware and software. Whenever possible, HHG will elect cloud-based software system that allow the use of standard hardware and that provide sufficient back-up capabilities. Hardware configurations are reviewed with each software application in order to determine what equipment will best meet the needs of the customer. HHG makes every effort to provide the most suitable desktop or laptop while maintaining HHG cost effectiveness. Employees will be given access to appropriate network printers. Employees needing computer hardware beyond that which is typically provided must request such hardware from their General Manager. In some limited cases, employees may be given local printers if deemed necessary by the HR Manager in consultation with the Chief Operating Officer. <sup>[1]</sup><sub>[SEP]</sub>

All software acquired or developed by HHG is and at all times shall remain HHG property and must be serviced by a real-time offsite backup system. All such software must be used in compliance with



applicable licenses, notices, contracts and agreements. All purchasing of HHG software shall be centralized by the Chief Operating Officer to ensure that all applications conform to regulatory and HHG software standards and are purchased at the best possible price. All requests for software must be submitted to the General Manager for approval.

All financial data and records will be maintained in accordance with CCC regulation 935 CMR 500.105(9).

## **EMPLOYEE RECORDS ORGANIZATIONAL CHARTS AND JOB DESCRIPTIONS**

The Chief Operating Officer or designee must maintain a current organizational chart and job descriptions for each employee and volunteer position.

## **EMPLOYEE RECORDS**

The Chief Operating Officer or designee must maintain accurate employee records for each employee. Such records must be maintained for a recommended five years and include:

- All materials submitted to the regulatory agency
- A copy of their regulatory agency issued licensing; Including background check documents which will be stored in accordance with 935 CMR 500.030.935 and 935 CMR 500.105(9)
- Documentation of verification of references
- The **job description** or employment contract that includes a description of duties, authority, responsibilities, qualifications and supervision for each agent/employee
  - Documentation of all training received by the employee and the signed statement of the employee indicating the date, time and place the training was received and the topics discussed, including: The name and title of trainers
  - Documentation of periodic performance evaluations and a record of any disciplinary action taken.
- Personnel record for each agent including policies and procedures
- Staffing plan for facility hours and that will demonstrate accessible business hours and safe cultivation conditions

## **COMPENSATION RECORDS**

The Chief Operating Officer or designee must maintain records documenting the salary and wages paid to each employee, stipend paid to each executive manager and any executive compensation, bonus, benefit or item of value paid to any individual affiliated with HHG, including executive managers. These confidential records must be maintained for a recommended period of at least five years.



## **SECURITY RECORDS**

The Security Officer must ensure 24 hours recordings from all video cameras are available for immediate viewing by the authorities in accordance with regulations. HHG policy is to retain these recordings for a minimum of 90 days or longer as necessary per regulatory agency regulations. The Chief Operating Officer in coordination with the Security Officer must ensure the proper retention of all recordings. Recordings shall not be destroyed or altered and shall be retained as long as necessary if the Chief Operating Officer is aware of a pending criminal, civil or administrative investigation or legal proceeding for which the recording may contain relevant information. All facilities will maintain all security system equipment and recordings in a secure location so as to prevent theft, loss, destruction or alterations. A current list of authorized employees and service personnel that have access to the surveillance room must be maintained and enforced by the Security Officer. Records of security tests must be maintained for five years and made available to the regulatory agency upon request.

## **THEFT AND LOSS**

The Chief Operating Officer must ensure that all theft or loss reports originating from any department are reported to the appropriate law enforcement agency and the regulatory agency as required by regulations and fully documented in HHG's records. All related documentation must be available for review by the regulatory agency or other authorities upon legal request for a recommended period of at least five years or longer as required by regulations.

## **NOTIFICATION OF BREACH**

The Chief Operating Officer in coordination with the Security Officer must ensure all security equipment is designed to provide immediate automatic or electronic notification to alert the local law enforcement agency of an unauthorized breach of security in any HHG facility. The Chief Operating Officer must ensure all employees are properly trained and directed to notify local law enforcement immediately upon discovering a breach of security.

## **MAINTENANCE RECORDS**

HHG must maintain records of any maintenance, cleaning, sanitizing and inspection in any HHG facility. The Chief Operating Officer is responsible for oversight and maintenance of such records.

## **TRANSPORTATION RECORDS**

At any time, cannabis, cannabis waste or cannabis products are transported out of a HHG facility for any reason, there are policies that must be adhered to. All deliveries must be accompanied by a shipping manifest. The shipping manifest must be verified as accurate by the Transportation and Dispensary Manager and provided by the Transportation and Dispensary Manager or transporting employee to the receiving location.



The transporting employee must record the end time of each trip and any variances occurring to the trip plan in the Transportation Event Log. Any vehicle accidents must be reported by the transporting employee to the transportation manager immediately.

Any loss or theft of cannabis must be reported by the transporting employee immediately to the Transportation Manager. Any manager receiving a loss or theft report from a

transporting employee must notify the Chief Operating Officer immediately. The Chief Operating Officer must report the occurrence to the appropriate law enforcement agency and the regulatory agency immediately.

The Chief Operating Officer must ensure transportation records are maintained in accordance with regulations and provided to the regulatory agency upon request.

### **PRODUCT DISPOSAL RECORDS**

All waste composed of or containing cannabis at each dispensary, will be stored, secured and prepared for destruction in accordance with applicable CCC and local laws and regulations. All cannabis products marked for waste will be ground up and mixed with an inert compound. All waste disposed of will be recorded in a Product Disposal Log, including the date of disposal; the type and quantity disposed of; the manner of disposal; the reason for disposal and the name of the customer who supplied the waste, if applicable. The Product Disposal Log will be saved for three years pursuant to CCC regulations 935 CMR 500.105(12)

### **LABORATORY RECORDS**

Each HHG employee must ensure that no laboratory record presented by HHG is falsified in any manner. Any employee who knowingly falsifies a laboratory report will be terminated immediately. Any employee who suspects that a laboratory record may have been falsified must report to the HR Manager and Quality Control Manager immediately as a condition of employment.

### **MAINTENANCE RECORDS**

Each Manager must maintain records of any maintenance, cleaning, sanitizing and inspection in any HHG facility. The General Manager is responsible for oversight and maintenance of such records.

### **TERMINATION OF OPERATIONS NOTIFICATION**

If any department of HHG that requires licensing with the regulatory agency is closing for any reason, the HR Manager must ensure that the regulatory agency is notified in accordance with regulations. In the case of an emergency that requires a temporary cessation of operations, the General Manager must notify the regulatory agency immediately for further direction and instruction on the appropriate procedures to undertake.



All activities must be appropriately documented and recorded by the HR Manager during any period of temporary or permanent closure. The Chief Executive Officer is responsible for the oversight of any temporary or permanent closure activities.

### **INTERNAL LABORATORY REPORTS**

Each employee must ensure that no laboratory record presented by HHG is falsified in any manner. Any employee who knowingly falsifies a laboratory report will be terminated immediately. Any employee who suspects that a laboratory record may have been falsified must report to the Chief Operating Officer and Quality Control Manager immediately as a condition of employment.

The internal laboratory is required to maintain records for the following QA/QC/laboratory activities including sample receiving, tracking, storage and disposal; sample preparation, analysis and documentation; standards preparation, documentation, handling and storage; standards and chemical receiving, tracking, storage and disposal; instrument and equipment operation and maintenance; data collection, handling, reporting and storage; records pertinent to the quality of analytical data reported.; analyst training records; monthly and yearly safety inspections and emergency responses.

### **RECORDS INCIDENTS**

Any loss or unauthorized alteration of HHG records discovered or suspected by any employee must be reported to the Chief Operating Officer immediately. The Chief Operating Officer must report such incidents to the regulatory agency and law enforcement as necessary. Upon discovery of a records security breach, the Chief Operating Officer must review all recordkeeping and security policies to identify deficiencies and necessary corrective measures. The Chief Operating Officer must engage the service of a third-party data security expert as needed.

### **INCIDENT REPORTING**

Incident reporting must be documented by the Department Manager and reported immediately to the Chief Operating Officer or the Security Officer, in accordance with HHG reporting and notifications policies and procedures. Anyone with knowledge or a reasonable suspicion of an incident is instructed to make an immediate report to the Department Manager and record the Incident in the Incident Log. All incident activities, from receipt of the initial report through post-incident review, are to be documented. The Security Officer is responsible for ensuring all events are recorded, assembling these records in preparation and performance of the post-incident review and ensuring all records are preserved for review.

### **REPORTING OF RECORDS INCIDENTS**

Any loss or unauthorized alteration of records at the dispensary related to cannabis, customers or employees will be reported to the Chief Operating Officer or Security Officer immediately. The Security



Officer will report any such incident to the Chief Operating Officer and the regulatory agency and law enforcement.

## **RECORDS MAINTENANCE**

All electronic HHG records are recommended to be maintained for a minimum of five years. It is HHG policy to retain records in perpetuity unless a member of senior management determines the electronic record should be deleted or destroyed. The Quality Control Manager shall determine the need to destroy paper records.

## **ELECTRONIC RECORDS**

HHG shall maintain all HHG records in an electronic format. A cloud-based backup system will provide a second location for a duplicate copy of all records which will be in the Office 365 SharePoint environment. Independent laboratory records shall be maintained in METRC.

## **PAPER RECORDS**

Quality control employee records may contain paper documents including training documentation forms. All human resources records will be maintained by administrative management and securely stored in accordance with all employment laws.

In accordance with CCC regulation 935 CMR 500.105(1) and 935 CMR 500.105(9) HHG will maintain and follow the following written operating procedures:

- a) Security measures
- b) Employee security policies
- c) Marijuana retail dispensary hours of operation
- d) Marijuana product storage
- e) Marijuana strains and product mix
- f) Accurate accounting and inventory
- g) Quality control
- h) Staffing plan and staffing records
- i) Emergency procedures and disaster plan (fire, wind, flooding etc.)
- j) Alcohol, smoke and drug free workplace policies
- k) Storage of confidential information
- l) Termination of employee or agent
  - Product diversion



- Unsafe work practices
- Criminal history
- m) Corporate hierarchy including board members and executives
- n) Policies for handling cash
  - Storage
  - Transportation
  - Collection frequency
- o) Diversion prevention for minors
- p) Energy efficiency



## HHG's Plan for Separating Medical from Recreational Operations

Holistic Health Group has obtained host agreements from the town of Middleborough to conduct vertical Cannabis production and sales operations in both adult use and medical markets. HHG's cultivation and processing center will track each plant pursuant to production allowances separately, and reserved from seed through sale in either one, or the other market. HHG may, from time to time, request from the Cannabis Control Commission in a form provided by the Commission, the transfer of product from adult use to medical markets, or the reverse. HHG's dispensary will therefore serve both qualified medical patients and customers over the age of 21, pursuant to Cannabis Control Commission (CCC) regulations at 935 CMR 502 et. Seq. Concerning co-located marijuana operations.

### **CULTIVATION & PRODUCTION PROCEDURES**

HHG will identify and track all plants slated for either the adult use, or medical, markets from immaturity through harvest pursuant to CCC regulations at 935 CMR 502.120 & 500.120, including waste and production, and complying will all seed to sale requirements through the processing and manufacturing operations. All tracking of medical and adult use products, plants, and waste will be done within METRC.

At the point of initial production, HHG will also comply with 935 CMR 501.105(3) concerning handling, testing and production of MIPs; as well as with 935 CMR 500.130 concerning seed to sale procedures, and additional requirements for product manufacturers.

Medical MIPs will be packaged appropriately and kept separately from Adult Use MIPs, and all MIPs will comply with packaging, labeling and dosage requirements under CCC regulations at 935 CMR 500.150.

### **DISPENSARY DESIGN**

HHG has designed its dispensary to include dedicated access for medical marijuana patients to ensure better patient access to its products. Design elements include designated patient and handicapped parking close to dispensary entrance and exit points, and multiple exclusive medical point of sale terminal within the dispensary. The dispensary design will include separate lines for sales of medical and adult-use marijuana. Medical patients and caregivers will be able to use both lines pursuant to CCC regulation 935 CMR 502.140. The dispensary will create literature to explain basic and advanced information about Cannabis, as well as provide traditional dosage and use examples.

A qualified agent of HHG will be on staff at all hours when the dispensary is open, to provide information about Cannabis and its therapeutic uses. HHG's dispensary also includes a private consultation room separate from the retail floor in the event a patient requires a one-on-one discussion.



Medical patients and caregivers will have priority access for initial check in and identification verification by allowing them to schedule their appointments and time of entry. HHG will also have 2 check-in lines specifically marked for medical and adult-use. The medical customers will be in a priority check-in line. HHG will make an effort to prioritize access to the medical community pursuant to CCC regulation 935 CMR 502.140.

### **DISPENSARY PROCEDURES**

HHG will at all times comply with dispensary operation procedures under Cannabis Control Commission regulations at 935 CMR 502.140, including but not limited to:

1. Verification of age and patient registration status for all patrons and customers.
2. Sales limitations, sales refusals, and recording sales.
3. Continued separate tracking and physical separation of Cannabis and MIPs designated for either medical or adult use.
4. Consumer & Patient Education

### **PATIENT SUPPLY**

All products will be tested by an independent testing laboratory in accordance with CCC regulations at 935 CMR 500.105(8)(c), pursuant to standards required under Section 500.160, and HHG will at all times beginning 6 months after sales operations commence, maintain a quantity and variety of marijuana products for patients sufficient to meet patient demand pursuant to its recorded sales.

HHG will track product types and strains sold to patients, and shall report to the CCC upon request such data over each preceding 6 month period. HHG will also submit quarterly and upon the request of the CCC, its inventory plan including quantities and varieties reserved for medical patients. Patient supply audits will be conducted weekly and retained for a period of at least 6 months. HHG shall maintain and provide on a biannual basis accurate sales data that has been collected during the 6 months for the purpose of ensuring adequate supply of marijuana under 935 CMR 500.140(10), 935 CMR 502.140. Also during the initial 6 months of operation HHG will reserve 35% of the marijuana products pursuant to CCC regulation 935 CMR 502.140.

The marijuana products that are reserved for medical patient supply will reflect the actual types, and strains of marijuana products available and documented during the prior 6 months. If a strain or product is no longer available a substitution will be made that reflects the type and strain no longer available as closely as possible pursuant to CCC regulations 935 CMR 502.140.

HHG will comply with any and all actions taken by the CCC with respect to compliance, inspections, and if necessary deficiency statements and plans of action.







## QUALITY CONTROL AND TESTING PROCEDURES

### OVERVIEW

HHG, as a vertically integrated and single co-located Cannabis company for the medical and adult use markets has developed a Quality Control and Testing Plan that fully addresses the safety of our customers, our surrounding community, and our employees as agents. 935 CMR 502.000. The company's standard operating procedures (SOPs) have been drafted to ensure compliance with the requirements of the Cannabis Control Commission's ("CCC's") regulations. These SOPs specifically address quality control measures and laboratory testing among other topics.

HHG is committed to only producing the safest of products. A robust testing plan will ensure that HHG's products are produced in accordance with good manufacturing practices and held to rigorous testing standards. Product testing will include analysis for potency, terpenes, heavy metal, solvents, pesticides, microbial contamination, and shelf life. Tests is performed both on site for quality control, and a licensed independent testing facility provides mandatory independent data review on all final products tested prior to releasing for distribution. 935 CMR 500.160; 935 CMR 501.160.

### HANDLING AND FACILITY REQUIREMENTS

HHG ensures that only the leaves and flowers of the female plant are processed in a safe and sanitary manner as described below in accordance with 935 CMR 500.105(3) & 935 CMR 500.105(3):

- Well cured and generally free of seeds and stems
- Free of dirt, sand, debris, and other foreign matter
- Free of contamination by mold, rot, other fungus, and bacterial diseases
- Prepared and handled on food-grade stainless steel tables
- Packaged in a secure area

Each employee is required to demonstrate their comprehension of these detailed procedures prior to performing any task. Additionally, all third-party contractors , by contract, perform their duties in compliance with HHG policies and regulatory agency regulations as above.

All HHG agents whose job includes contact with marijuana are trained to conform to requirements for food handlers specified in 105 CMR 500.00 *Good Manufacturing Practices for Food*, and where applicable 105 CMR 590.000 *State Sanitary Code Chapter X: Minimum Sanitation Standards for Food Establishments*. In addition:

Agents working in working in contact with Marijuana or non-edible Marijuana Products, including those in HHG's cultivation, production and packaging, are subject to the requirements for food handlers specified in 105 CMR 300.00 *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*.

Any marijuana establishment employee working in direct contact with preparation of Marijuana or non-edible Marijuana Products shall conform to sanitary practices on duty. This includes but is not limited to:

- Maintaining adequate personal cleanliness;



- Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated;
- Hand-washing facilities are adequate and convenient and furnished with running water at a suitable temperature. Handwashing facilities shall be located in the Marijuana Establishment in Production Areas and where good sanitary practices require Employees to wash and sanitize their hands, and shall provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
- There is sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
- Litter and waste are properly removed, disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. Operating systems for waste removal shall be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
- Floors, walls, and ceilings are constructed in such a manner that they may be adequately kept clean and in good repair;
- There is adequate safety lighting in all Processing and storage areas, as well as areas where equipment or utensils are cleaned;
- Buildings, fixtures, and other physical facilities are maintained in a sanitary condition;
- All contact surfaces, including utensils and equipment, are maintained in a sanitary condition. Such surfaces shall be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered with the U.S. Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils are so designed and of such material and workmanship as to be adequately cleanable;
- All toxic items shall be identified, held and stored in a manner that protects against contamination of Marijuana Products. Toxic items shall not be stored in an area containing products used in the cultivation of Marijuana;
- HHG's water supply will be from the town, and is sufficient for necessary operations;
- Plumbing is of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the Marijuana Establishment. Plumbing shall properly convey sewage and liquid disposable waste from the Marijuana Establishment. There are no cross-connections between the potable and wastewater lines;
- HHG's facility features for its employees adequate, readily accessible toilet facilities that are maintained in a sanitary condition in good repair;
- Products that can support the rapid growth of undesirable microorganisms shall be held in a manner that prevents the growth of these microorganisms;
- Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers;
- All vehicles and transportation equipment used in the transportation of Marijuana Products or Edibles requiring temperature control for safety must be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the Marijuana Products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c);



HHG shall notify the CCC within 72 hours of any laboratory testing results indicating contamination if contamination cannot be remediated and disposal of the production batch is necessary;

Any employee or contractor who acts in a non-compliant or negligent manner will be reprimanded or terminated depending on the severity of their offense. In order to establish an effective operating system with a culture of compliance, all employees and contractors will be required as a condition of employment or contract to report any observed compliance issues to the appropriate party; 935 CMR 500.105(3)

## TESTING

### PRODUCT TESTING

### MEDIUM/WATER TESTING

## CONTAMINATION/QUARANTINE/RECALL

### STANDARD OPERATING PROCEDURES

HHG will implement quality systems controlled by our SOPs and based on standards to control processes that are critical to product safety. Managers will be responsible for oversight of these quality systems while our Chief Operations Officer and General Counsel will ensure our protocols comply with regulatory agency regulations. Every SOP implemented in the cannabis establishment will incorporate employee, community, customer, and product safety considerations and will require strict quality control and assurance practices in all of HHG's daily activities.

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The respective managers are responsible for updating HHG's SOPs to maintain compliance with all published rules and forthcoming guidance from the CCC on product safety, while our General Manager will maintain the procedures and stay current with best practice and industry innovations.

SOPs will be updated as often as necessary to maintain compliance with all laws and regulations that govern HHG's operations. HHG's General Counsel and COO, under the CEO's oversight, are responsible for incorporating into the SOPs any additions or amendments to the regulations, as well as any guidance or directives published by the regulatory agency. Manager level employees will be responsible for drafting, updating and maintaining the SOPs in their area of supervision.

## TESTING

The Quality Control Manager will establish methods for the analysis of potency, terpenes, residual solvents, pesticide residuals, micro biologicals, Aflatoxin, ochratoxin and heavy metals. Any cannabis or



cannabis product deemed a failure by the standards will be remediated and retested with the Quality Control Manager's approval or destroyed.

### ***Quarantine***

When necessary, the cannabis facility may quarantine cannabis product and will not transport, distribute, or dispense such product unless the Quality Control Manager releases the hold. Only the Quality Control Manager may release a batch of cannabis for distribution to customers.

### ***Chain of Custody***

A rigorous chain of custody will be maintained to ensure that cannabis is not released for distribution until the batch is in compliance with all HHG policies and procedures. From the time that a batch has been packaged for distribution until the independent testing laboratory provides a report detailing passing results, the Quality Control Manager will segregate and withhold from use the entire batch, except the samples that have been removed for testing.

### ***Product Security***

Quarantined batches will be held in storage with full camera coverage. All batches will be properly labeled for quarantine and entered into a METRC system with a quarantined status. No batch will be transferred from quarantine until the Quality Control Manager releases the batch in the system for transfer.

### ***Storage Conditions***

In addition to security requirements, strict environmental controls as required in all quarantine holding areas. All cannabis must be housed in a sanitary area with optimal environmental conditions to preserve the identity, purity and strength of the products. The Quality Control Manager will determine the appropriate storage conditions for each product manufactured.

### ***Training Required***

All employees will be trained by the Quality Control Manager to conform to the HHG's quarantine policies and procedures. No Analytics Technician may release batches from quarantine unless the Quality Control Manager approves and documents their authorization in the employee's training record.

## **TESTING REGIME**

The Quality Control Manager may perform any test he or she deems necessary at any time and will establish the HHG's testing requirements and sample size required for in-process and finished products.

### **Pesticides, Residual Solvents and Heavy Metal**

HHG will only perform internal testing for pesticides, residual solvents and heavy metals in the event the Quality Control Manager deems necessary. If contamination could be present in plant material or extracted oil due to suspect cultivation methods, components, excipients, or other contributing factors, the tests will be performed.



HHG will also maintain a robust incoming inspection and supplier control program that will test and control inputs to avoid product contamination and adulteration. If the laboratory detects an adverse level of contaminants, all materials, or products that compose the batch tested, will be quarantined until an investigation determining the source of contamination is completed and a determination on batch status is made.



## Dispensing Plan

### Restricted Access:

Patient, consumer, and community safety are of the utmost importance to Holistic Health Group ("HHG"). As a co-located adult-use and medical location, per 935 CMR 500.140(3), HHG's dispensary facility is restricted to individuals 21 years of age and older. If an individual is younger than 21 years old but is 18 years of age or older, they shall not be admitted unless they produce an active medical registration card issued by the CCC. If the individual is younger than 18 years old, they shall not be permitted unless they produce an active medical registration card and are accompanied by a personal caregiver with an active medical registration card. In addition to the medical registration card, registered qualifying patients 18 years of age and older and personal caregivers must also produce proof of identification.

Upon a customer or patient's entry into the HHG premises, an HHG agent immediately inspects the customer's government-issued proof of identification at the check-in window located in the vestibule. HHG will refuse entry to any consumer or patient unable to produce a valid form of identification.

As an additional measure, HHG will post, in a location that is visible from the point of entry to the vestibule check-in window, signage that indicates the following:

- It is the obligation of the qualified patient or primary caregiver to produce a valid registration card issued by the CCC, or a valid government-issued photo ID for all adult-use consumers;
- It is the obligation of the qualified patient or primary caregiver to produce a valid, government-issued photo identification document displaying proof of age that matches the name on the medical registration card; and
- The sale or diversion of marijuana to minors is a crime in violation of Massachusetts General Law.

Once granted access to the dispensary floor, adult-use customers enter a marked queue to obtain individualized service where they may select any of the products available to them with the help of an HHG agent. Medical patients enter a separate marked queue to obtain individualized service. Once engaged by an HHG agent at the point-of-sale, customers and patients are required to confirm their identities and age a second time by showing their identification, along with their CCC registered patient credentials if applicable.

### Point-of-Sale:

HHG's dispensary utilizes GreenBits for its point-of-sale software. Before beginning a transaction, GreenBits prompts the agent to indicate whether the transaction will be for medical or retail sales, even though separate lines are maintained for adult use and medical sales. Medical card holders may use either line. The majority of medical transactions take place in the medical queue, but this feature also allows, if necessary, to conduct medical sales in the retail queue.

Once a customer or patient has ordered their product(s), an HHG agent transfers the items from the designated short-term product storage area. The HHG agent then scans each product barcode into the point-of-sale system and affixes a label to each item, as generated by the point-of-sale system, indicating the date of the transaction with the address and phone number of the HHG facility.



An HHG agent, in their opinion, may determine an individual would place themselves or the public at risk and can refuse to sell any cannabis products to the individual. If there is no such risk, the agent uses the point-of-sale system to accept payment and complete the transaction. The system will back up and securely store each transaction for inspection. The checkout process reconciles inventory in METRC and is compliant with 935 CMR 500.105(8). Under MGL c. 94G § 7, sales are limited to one ounce of marijuana flower or five grams of marijuana concentrate per transaction for adult use customers. All required taxes will be collected at the point-of-sale.

Pursuant to 935 CMR 500.140(6)(d), HHG will conduct monthly analyses of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data. If any such malware is found, HHG will immediately report the occurrence to the Commission and assist in any subsequent investigation into the matter. HHG will maintain a record of the monthly data and make it available for inspection by the Commission upon request. Further, HHG will cooperate with the Commission and the Department of Revenue to ensure compliance with all taxes per the laws of the Commonwealth and 935 CMR 500.000.

HHG will maintain separate accounting practices at the point of sale for cannabis and non-cannabis purchases.

HHG's facility prioritizes cleanliness, security, and proper product storage in its operation. In addition to regularly sanitizing surfaces with environmentally conscious products kept separately and away from marijuana products, HHG dispensary staff will ensure personal hygiene, including washing hands throughout the day and before handling or dispensing any cannabis products. All products available for sale and consumption will be tested for impurities and subjected to HHG's quality control policies per 935 CMR 500.105.

**Pricing Structure:**

HHG's offerings and pricing structure will vary based on market conditions. HHG plans to sell products of the highest quality and purity, and will price its offerings accordingly.

**Customer/Patient Education:**

In compliance with 935 CMR 500.140(6) and 935 CMR 501.140(8), HHG provides educational materials designed to help consumers make informed marijuana product purchases. The Company's educational materials describe the varying types of products available at HHG's facility, as well as the types and methods of consumption. The consumer materials include information on: potency; dosing; the delayed effects of ingestible cannabis products; substance abuse and related treatment programs; cannabis tolerance, dependence, and withdrawal. These materials will be made available in commonly spoken languages as designated by the commission and will also be available for the visually and hearing impaired.

Customers visiting the facility for the first time go through an intake process where they receive a summarized safety guide on regulations surrounding cannabis, how to safely consume, store, and transport their product(s); and information regarding product categories, dosage, and desired effects. If it is a qualified patient's first time purchasing medical marijuana, the check-in agent refers the patient to the patient consultation area for a private meeting with a qualified HHG agent. The private consultation area is a room connected to the dispensary floor, separated by a door for privacy. Patient consultations



are available by in-store request during business hours and reservations can be booked through HHG's website at any time.

Table-top displays, pamphlets, and other materials are available in the entry vestibule and throughout the dispensary floor. There is also signage at each point-of-sale terminal reminding customers about the consequences of product diversion. Three television monitors around the dispensary floor display transaction-related content and the order queue.

During every transaction, HHG agents verbally ask customers and patients at the point-of-sale if they have any questions about their selected products. Subsequently, they guide how to safely store, consume, and transport their products if needed. Summarized product safety guides and general informational materials are available at the point-of-sale for takeaway purposes and on the Company's website to ensure customers have access to this material when they intend to utilize the product(s).

Materials provided will include the below information:

- A warning that marijuana has not been analyzed or approved by the FDA, limited information on side effects, that there may be health risks, and that it should be kept away from children;
- 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;
- Information to assist in the selection of marijuana;
- Materials offered to consumers to enable them to track the strains used and their associated effects;
- Information describing proper dosage;
- A discussion of tolerance, dependence, and withdrawal;
- Facts regarding substance abuse signs and symptoms;
- A statement that consumers may not sell marijuana to any other individual;
- Information regarding penalties for possession or distribution.

#### **Communication:**

HHG will engage in reasonable marketing, advertising, and branding practices that do not jeopardize the general public's public health, welfare, or safety or promote the diversion of cannabis or cannabis use in individuals younger than 21 years old. All marketing, advertising, and branding created for public viewing will include the statement: "Please Consume Responsibly" in a conspicuous manner on the face of the advertisement, and will consist of a minimum of two of the warnings, located at 935 CMR 500.105(4)(a), in their entirety in a conspicuous manner on the advertisement:

- *This product has not been analyzed or approved by the Food and Drug Administration (FDA).*
- *There is limited information on the side effects of using this product, and there may be associated health risks.*
- *Marijuana use during pregnancy and breastfeeding may pose potential harms.*
- *It is against the law to drive or operate machinery when under the influence of this product.*
- *KEEP THIS PRODUCT AWAY FROM CHILDREN.*
- *There may be health risks associated with consumption of this product.*
- *Marijuana can impair concentration, coordination, and judgment.*



- *The impairment effects of edible marijuana may be delayed by two hours or more. In case of accidental ingestion, contact poison control hotline 1-800-222-1222 or 9-1-1. This product may be illegal outside of MA."*

HHG communicates with customers and patients through:

1. An age-restricted, company-run website and web-based mobile application;
2. Popular digital and print cannabis networks such as WeedMaps and Leafly;
3. Wholesale platforms including but not limited to LeafLink and LeafTrade;
4. Social media platforms such as Instagram, YouTube, Facebook, TikTok, and LinkedIn;
5. Opt-in direct communications; via email and/or text message communications, and
6. Through in-store signage.

Upon in-store request, HHG will provide a catalog and a printed list of the prices and products available to consumers and post the same catalog and list on its website and in the dispensary.

#### **Sales:**

HHG sells its products and services by engaging customers with knowledgeable in-store personnel, informed online customer service, and acceptable content on digital platforms.

HHG creates and engages in events where 85% or more of the audience is reasonably expected to be 21 years of age or older, as determined by reliable, current audience composition data. HHG will market its products and services to reach a wide range of qualified consumers at these events.

The company ensures that all cannabis products that are provided for sale to consumers and/or are sold in tamper or child-resistant packaging. Packaging for cannabis products sold or displayed for consumers, including any label or imprint affixed to any packaging containing cannabis products or any exit packages, will not be attractive to minors. All HHG packaging will be labeled in compliance with 935 CMR 500.105(5).

Packaging for cannabis products sold or displayed for consumers in multiple servings will allow a consumer to easily perform the division into single servings and include the following statement on the exterior of the package in a printed font that is no smaller than ten-point Times New Roman, Helvetica, or Arial, including capitalization: "INCLUDES MULTIPLE SERVINGS." HHG will not sell beverages with multiple servings, and every individual serving of an edible or derivative cannabis product contained in a multiple-serving package will be marked, stamped, or otherwise imprinted with the symbol issued by the Commission under 935 CMR 500.105(5) that indicates that the single serving is a cannabis product. No individual serving of any cannabis product will contain more than five milligrams (5mg) of delta-nine tetrahydrocannabinol.

To comply with 935 CMR 500.140(10), HHG ensures that 35% of all marijuana and marijuana product inventory is reserved for medical patients. Each quarter, HHG will conduct a review of all medical and retail sales figures from the previous [6] months to ensure that the products reserved for medical sales reflect the trends in demand exhibited by both medical and retail patient populations. These reviews will be made available to the Commission in a format determined by the Commission. Weekly audits will also be conducted by inventory staff to ensure that appropriate levels of medical inventory are being reserved. These audits will be carried out in conjunction with other weekly inventory count procedures to avoid duplicating efforts.



Under no circumstances will products containing nicotine or alcohol be sold in HHG's retail locations.  
935 CMR 500.140(4) and 501.140(4)

**Logos:**

HHG has developed a series of logos to be used in labeling, signage, and other materials such as company letterhead and distributed materials.

These logos are subtle, unassuming, and do not use medical symbols, images of cannabis, related paraphernalia, or colloquial references to cannabis or marijuana.



**HOLISTIC  
HEALTH  
GROUP**

935 CMR 500.140

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## DIVERSITY PLAN

Holistic Health Group Inc. (“HHG”) operates a medical and recreational Cannabis cultivation, manufacturing and sales facility in its host community of Middleborough, a town comprised of approximately 96.1% individuals identifying as “white” or “Caucasian.” The three next most populous races identify as African Americans at 1.3%, Native Americans at .3%, and Asians at .4%. And while HHG’s HCA mandates a preference for hiring within this Town, Holistic Health Group has set a goal to employ as many qualified minority candidates as possible, in addition to veterans and those with disabilities, and women, to ensure these groups are not excluded from those participating in this new industry. To attain viable candidates, HHG will deploy all available methods of outreach. All efforts will adhere to the requirements set forth in CCC regulation 935 CMR 500.105(4) and its guidance on permitted and prohibited advertising, branding, marketing and sponsorship practices. HHG acknowledges that being located in an area with limited minority populations presents potential barriers to a diverse workforce, HHG is committed to work to address these barriers.

No actions taken in reaching the below goals will violate the commission's regulations with respect to the limitations on ownership, control or other applicable state laws.

### **Goals:**

1. HHG’s goal is to maintain the most diverse workforce possible. The companies’ goal will be to attract and retain qualified employees who are minorities, woman, veterans, persons with disabilities, and members of the LBGTQ+ community.  
HHG aims to have a staff comprised of:
  - 50% women
  - 20% minorities
  - 15% veterans
  - 10% LQBTQ+
  - 5% persons with disabilities
2. Make the HHG workplace a safe, accepting, welcoming and supporting place to work. HHG aims for an 80% retention rate and 95% positive rating from employees regarding workplace inclusion and safety.
3. HHG will also make efforts to include suppliers, wholesale partners, contractors and other vendors in this plan by giving priority to companies that are owned by members of the above groups.  
HHG aims to have the following composition of partners:
  - 5% woman owned
  - 5% veteran owned
  - 5% minority owned



- 2.5% LGBTQ+ owned (if this is below 0, the goal will be at least 1)
- 2.5% Persons with disabilities owned

### ***Programs:***

#### *Recruitment and hiring program:*

HHG will give hiring preference to applicants who are members of one of the groups identified in the above goals. HHG will ensure job postings reach these communities and address employment barriers by taking the following actions:

- HHG will promote its hiring preferences on the company website, recruitment sites (such as Indeed), all hiring related materials at events, and via social media on platforms like Instagram, LinkedIn and any other appropriate platform.
- HHG will hold at least 1 job fair annually that targets areas with a majority minority population. These events will be advertised via social media and the HHG website for at least 2 weeks prior to the event.
- HHG will develop and implement a program to assist qualified candidates who live outside the Middleborough area with relocation expenses.
  - HHG will commit up to \$6,000 (max \$2,000 per person) to assist with relocation expenses for qualified candidates not local to Middleborough.
  - HHG will cover up to 50% of costs associated with security deposits, moving supplies and temporary housing associated with a move.
  - This program will be available to both candidates and employees.

#### *Inclusion and retention program:*

HHG is committed to providing a work environment is diverse and inclusive. The company believes that a broad range of opinions and perspectives are critical in driving innovation. To this end, the companies' goal is to ensure that every person who visits feels safe, welcome and respected.

- HHG will provide all employees with training on workplace diversity and inclusion. This training will be provided by the companies' internal HR/training staff or via an online class such as <https://www2.syntrio.com/diversity-and-inclusion-training>.
- HHG will draft and integrate a non-discrimination policy into the companies' employee handbook.
- An annually survey of all employees will be conducted to measure employee satisfaction with the workplace, specifically workplace safety and inclusion. In addition to gathering numerical data, the survey will also include free form space for employee feedback. This feedback will be reviewed by the executive team and the diversity working group.



- g. HHG will create an internal diversity working group that will meet regularly to discuss issues related to inclusion and diversity. This group will be comprised of employees from a diverse background within the company and will also include HHGs president, compliance manager and general manager. The group will meet quarterly. This group will meet to discuss progress related to diversity goals and the effectiveness of the programs in place to promote diversity. The group will also discuss ways to improve existing programs to further promote diversity.

***Vendor Diversity program:***

HHG is committed to ensuring diversity efforts reach all areas of the company. This includes the selection of vendors, suppliers, contractors and industry partners. HHG will actively seek out, identify and pursue partnerships with companies owned and operated by members of the identified populations.

- h. HHG will give preference to companies whose ownership meets the stated criteria above.
- i. When sourcing new vendors, HHG will utilize the Massachusetts Supplier Diversity Office website.
- j. When soliciting bids for a new vendor, HHG will request demographic information to determine if the company meets any of the plan criteria.
- k. HHG will expressly promote the companies' desire to work with businesses owned by identified populations on the HHG's website and encourage those businesses to reach out.

***Plan evaluation:***

HHG recognizes the importance of monitoring and evaluating progress when implementing any plan. With this in mind, the company will conduct continual, ongoing evaluation and monitoring of this plan and its components.

1. As HHG expands hiring activities, the executive team will conduct a review of the pool of applicants to verify that the recruitment plan generating a diverse group of applications.
2. The executive team will review feedback from the quarterly diversity working group meetings to gauge workplace climate regarding inclusion.
3. This plan will be reviewed by the diversity working group at least twice a year to provide feedback on potential improvements or obstacles.



4. If it is found that insufficient progress is being made towards any stated goal, the executive team will convene a special meeting of the diversity working group to discuss any corrective actions needed.

***Reportable metrics:***

**HHG will annually review the below metrics to measure the success of the plan, these metrics will be reported to the commission during the license renewal process.**

1. Retention – HHG will review the overall retention rate for the company and compare that to the rate of retention for monitored groups.
2. Diversity – HHG will break down the percentage of staff that fall into monitored groups and will compare these numbers to labor market and industry benchmarks.
3. Hiring/recruitment – HHG will track demographic information for candidates who are interviewed and compare the number of interviews with candidates from monitored populations to non-monitored populations.
4. Promotions – HHG will compare the number of promotions for both monitored and non-monitored groups.
5. Vendors – HHG will track and report the total number of vendors and the total number of those vendors who are owned by a monitored group.
6. Job satisfaction – HHG will use its annual employee survey to gauge job satisfaction throughout the company. These numbers will be broken down and compared between monitored and non-monitored populations.