



Massachusetts Cannabis Control Commission

Marijuana Delivery Operator

General Information:

License Number: MD1299
Original Issued Date: 04/14/2023
Issued Date: 04/14/2023
Expiration Date: 04/14/2024

MARIJUANA DELIVERY OPERATOR PRE-CERTIFICATION NUMBER

Marijuana Delivery Operator Pre-Certification
Number:

ABOUT THE MARIJUANA DELIVERY OPERATOR LICENSEE

Business Legal Name: Many Rivers LLC

Phone Number: 508-309-4589
Email Address: RWPerlman@gmail.com

Business Address 1: 41 Eaton Road W
Business City: Framingham Business State: MA Business Zip Code: 01701
Business Address 2:
Mailing Address 1: 41 Eaton Rd W
Mailing City: Framingham Mailing State: MA Mailing Zip Code: 01701
Mailing Address 2:

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

No documents uploaded

Certified Disadvantaged Business Enterprises (DBEs): Not a
DBE

SOCIAL EQUITY OR ECONOMIC EMPOWERMENT LICENSE

Social Equity or Economic Empowerment License Number: SE305131

ADDITIONAL SOCIAL EQUITY OR ECONOMIC EMPOWERMENT LICENSE NUMBERS

No records found

PERSONS HAVING DIRECT OR INDIRECT CONTROL

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 100 Percentage Of Control: 100
Role: Owner / Partner Other Role:
First Name: Robert Middle Name: Last Name: Perlman 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:

Date generated: 05/01/2023

ENTITIES HAVING DIRECT OR INDIRECT CONTROL

No records found

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

MARIJUANA DELIVERY OPERATOR LICENSEE PROPERTY DETAILS

Establishment Address 1: 299 Hartford Turnpike

Establishment Address 2:

Establishment City: Shrewsbury

Establishment Zip Code: 01545

Approximate square footage of the establishment: 1800

How many abutters does this property have?: 144

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

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	HCA Attestation.pdf	pdf	62bdf2a49ff1170008271ee7	06/30/2022
Plan to Remain Compliant with Local Zoning	7-1-2022 MR - Shrewsbury Plan to Remain Complaint with Local Ordinances.pdf	pdf	62c46a859ff117000829c737	07/05/2022
Community Outreach Meeting Documentation	Attestation Meeting #2 12-1-2022.pdf	pdf	638e41d5a0fd020008d0ed08	12/05/2022

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
Plan for Positive Impact	Many Rivers Revised & Amended POSITIVE IMPACT PLAN 12-30-22.pdf	pdf	63b734db52253500085de9b2	01/05/2023

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner

Other Role:

First Name: Robert

Last Name: Perlman Suffix:

RMD Association: Not associated with an RMD

Background Question: yes

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	Cert of GS - {Many Rivers} - (11.9.22).pdf	pdf	638e4544a0fd020008d0f8a7	12/05/2022
DUA attestation if no employees	Executed CGS-DUA 11-10-2022.pdf	pdf	638e4695a0fd020008d0fd89	12/05/2022
Department of Revenue - Certificate of Good standing	Certificate of Good Standing DOR.pdf	pdf	6390dc5a52253500083f6da6	12/07/2022

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	Cert of Organization - {Many Rivers}.pdf	pdf	636b4f8e48ddb300087c2ff7	11/09/2022
Bylaws	Executed Single Member OA 6-14-21.pdf	pdf	638e47bca0fd020008d10298	12/05/2022

Massachusetts Business Identification Number: 001514036

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	**Business Plan.pdf	pdf	612ce8f2ac541007407128b7	08/30/2021
Plan for Liability Insurance	Many Rivers Home Delivery Operator - Pre-cert - P. Plan to Obtain Liability Insurance 2021-08-30.pdf	pdf	613a63b9b9f60d076b8d7053	09/09/2021
Proposed Timeline	MANY RIVERS DELIVERY Revised Timeline 2-9-23.pdf	pdf	63e64cbd35eb06000886df3a	02/10/2023

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Security plan	Many Rivers Home Delivery Operator - Pre-cert - A. Security Plan 2021-08-30.pdf	pdf	612dc8e4ac54100740712fd7	08/31/2021
Prevention of diversion	Many Rivers Home Delivery Operator - Pre-cert - B. Prevent Diversion 2021-06-30.pdf	pdf	612e28858aea4607aa2abeab	08/31/2021
Storage of marijuana	Many Rivers Home Delivery Operator - Pre-cert - C. Marijuana Storage Plan 2021-05-30.pdf	pdf	612e28a7ac5410074071308c	08/31/2021
Inventory procedures	Many Rivers Home Delivery Operator - Pre-cert - E. Inventory and Waste Disposal Procedures 2021-06-30.pdf	pdf	612e28e6ac54100740713096	08/31/2021

Delivery procedures (pursuant to 935 CMR 500.145 and 935 CMR 500.146)	Many Rivers Home Delivery Operator - Pre-cert - F. Delivery Procedures 2021-08-30.pdf	pdf	612e2908d64352077f3bfff2	08/31/2021
Quality control and testing procedures	Many Rivers Home Delivery Operator - Pre-cert - G. Quality Control Procedures 2021-06-30.pdf	pdf	612e292842744807726e4562	08/31/2021
Dispensing procedures	Many Rivers Home Delivery Operator - Pre-cert - I. Dispensing Procedures 2021-06-30.pdf	pdf	612e29973e10be075d4aa9f0	08/31/2021
Record-keeping procedures	Many Rivers Home Delivery Operator - Pre-cert - J. Record Keeping Procedures 2021-08-30.pdf	pdf	612e29b10b068e0732629f64	08/31/2021
Maintenance of financial records	Many Rivers Home Delivery Operator - Pre-cert - K. Maintenance of Financial Records 2021-05-30.pdf	pdf	612e29c5e140910769754af5	08/31/2021
Energy Compliance Plan	Many Rivers Home Delivery Operator - Pre-cert - M. Energy Compliance Plan 2021-05-30.pdf	pdf	612e29e60b068e0732629f6a	08/31/2021
A plan to obtain marijuana and marijuana products	Many Rivers Home Delivery Operator - Pre-cert - N. Product Acquisition Plan 2021-06-30.pdf	pdf	612e2a0de140910769754afb	08/31/2021
A detailed plan for White Labeling	Many Rivers Home Delivery Operator - Pre-cert - O. White Labeling 2021-08-30.pdf	pdf	612e2a2ad64352077f3c0002	08/31/2021
Qualifications and training	Many Rivers Home Delivery Operator - Pre-cert - L. Qualifications and Intended Training 2021-06-30.pdf	pdf	612e359423f64d075364d1cc	08/31/2021
Personnel policies	Many Rivers Home Delivery Operator - Pre-cert - H. Personnel Policies 2021-08-31.pdf	pdf	612e37d538fd570794517586	08/31/2021
Transportation of marijuana	Many Rivers Home Delivery Operator - Pre-cert - D. Transportation Plan 2021-09-09.pdf	pdf	613a640bb9f60d076b8d7057	09/09/2021
Diversity plan	MR DIVERSITY PLAN 1-9-23.pdf	pdf	63bc6ed6ae786400082ea90b	01/09/2023

COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

Monday From: 8:00 AM	Monday To: 9:00 PM
Tuesday From: 8:00 AM	Tuesday To: 9:00 PM
Wednesday From: 8:00 AM	Wednesday To: 9:00 PM
Thursday From: 8:00 AM	Thursday To: 9:00 PM
Friday From: 8:00 AM	Friday To: 9:00 PM
Saturday From: 8:00 AM	Saturday To: 9:00 PM
Sunday From: 8:00 AM	Sunday To: 9:00 PM

ATTESTATIONS

I certify that no additional entities or individuals meeting the requirement set forth in 935 CMR 500.101 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 Persons and Entities Having Direct or Indirect Control over the Marijuana Delivery Operator Licensee and a list of all persons or entities contributing 10% or more of the initial capital to operate the Marijuana Delivery Operator Licensee including capital that is in the form of land or buildings.: I Agree

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

I Agree

Notification:

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

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

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

AGREEMENTS WITH THIRD-PARTY TECHNOLOGY PLATFORM PROVIDER

No records found

THIRD-PARTY TECHNOLOGY PLATFORM PROVIDER DOCUMENTATION

No documents uploaded

Host Community Agreement Certification Form

Instructions

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

Certification

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

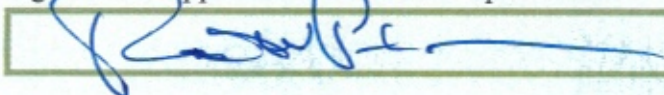
1. Name of applicant:

Many Rivers LLC

2. Name of applicant's authorized representative:

Robert Perlman

3. Signature of applicant's authorized representative:



4. Name of municipality:

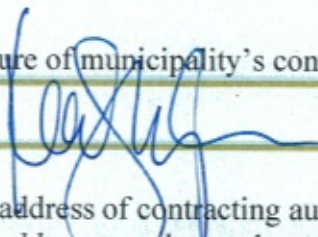
Town of Shrewsbury, MA

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

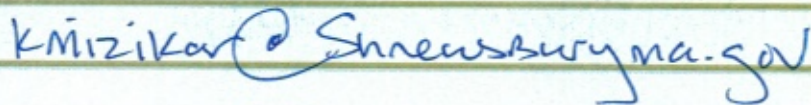
Kevin Mizikar, Town Manager



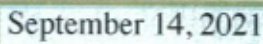
6. Signature of municipality's contracting authority or authorized representative:



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

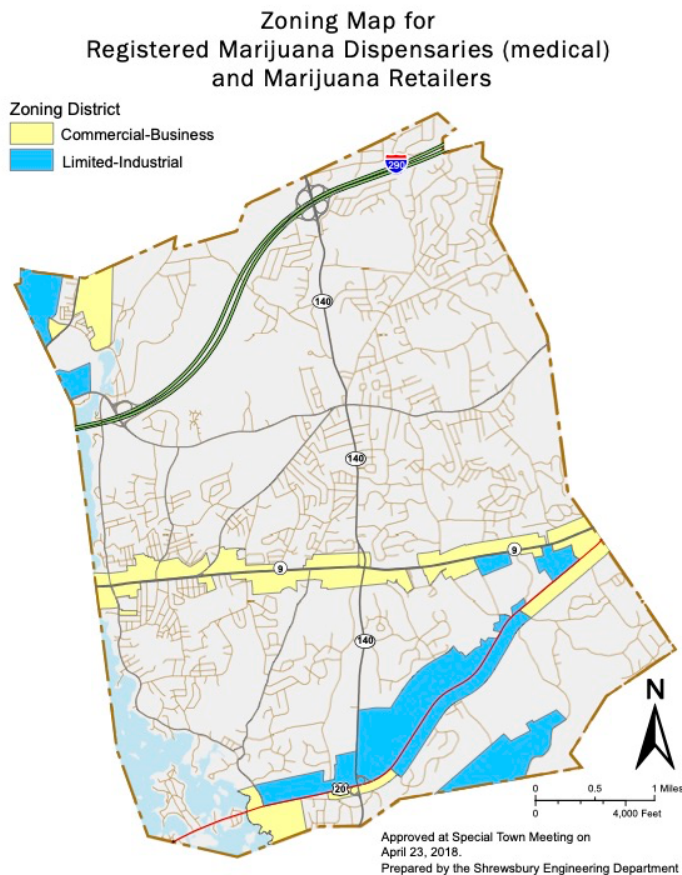


8. Host community agreement execution date:



Many Rivers' Plan to Remain Complaint with Town of Shrewsbury's Local Ordinances

Many Rivers' proposed Cannabis Delivery Operator Establishment is located at 299 Hartford Turnpike, Shrewsbury, MA in the "Limited – Industrial" Commercially-Zoned district. In accordance with the Town's Zoning Map for Marijuana Establishments: Marijuana Establishments are allowed to locate and operate in the Town of Shrewsbury within the Marijuana Overlay District.



Many Rivers' proposed location is not located on a parcel which is within five hundred (500) feet (to be measured in a straight line from the nearest point of the property line in question to the nearest point of the property line where the Marijuana Establishment or MTC is or will be located) of a parcel occupied (a) by a pre-existing public or private school (existing at the time the applicant's license application was received by the Commission) providing education in kindergarten or any of grades 1-12; or (b) by another Marijuana Establishment or MTC facility.

In compliance with the Town of Shrewsbury's Zoning Bylaws (Section VII – T. Marijuana Establishments) Many Rivers' will abide by all the requirements detailed within regarding:

- Authority, Purpose and Intent
- Special Permits
 - a. The Planning Board shall be the Special Permit Granting Authority for any Marijuana Establishment. The application requirements and procedures shall be in accordance with this Section, Section IX of the Zoning Bylaw, and the Planning Board's Rules and Regulations Governing Special Permits & Site Plan Review.
 - b. It shall be unlawful for any person to operate a Marijuana Establishment without obtaining a Special Permit to operate pursuant to the requirements of this Section of the Zoning Bylaw.
 - c. A Special Permit granted under this Section shall run with the applicant and shall be non-transferrable to another owner or operator without an amendment to the Special Permit following a noticed public hearing in accordance with M.G.L. c. 40A and this Zoning Bylaw.
- Application Requirements

In addition to the standard application requirements for Site Plans and Special Permits, an application for a special permit to allow a Marijuana Establishment use under this Section shall include the following:

- a. The name and address of each owner of the proposed facility/operation;
- b. For marijuana retailers, a description of the proposed operating hours, including opening and closing times for customers, delivery days and hours, and a trash and recycling schedule;
- c. Copies of documentation demonstrating a pending application or a license from the state Cannabis Control Commission;
- d. Evidence that the applicant has site control and the right to use the site for a facility in the form of a deed or valid purchase and sale agreement, or, in the case of a lease, a notarized statement from the property owner and a copy of the lease agreement;
- e. A Security Plan in accordance with the security regulations of the Cannabis Control Commission that includes the details of all exterior proposed security measures for the premises, lighting, fencing, gates and alarms, etc. and for the transportation of marijuana and marijuana products to and from off-site premises to ensure the safety of employees, patrons, and the public and to protect the premises from theft or other criminal activity;

- f. Where operations are co-located, a plan for separating the operations of a Registered Marijuana Dispensary (medical) and the operations of the proposed Marijuana Establishment (recreational); and
- g. Written Operating Procedures in accordance with Cannabis Control Commission's requirements, including but not limited to the following: fire prevention, sanitation requirements, waste disposal procedures, electrical system overview, proposed energy demand, proposed ventilation system and air quality control, proposed water system.

Upon written request from the applicant, the Special Permit Granting Authority may waive the submission of such information, or parts thereof, as may not be necessary for the consideration of the application. The Special Permit Granting Authority's waiver decision shall be set forth in the written Special Permit decision.

- Restrictions and Prohibitions

In addition to the following, Marijuana Establishments shall comply with all regulations that may be promulgated by the Cannabis Control Commission.

- a. Marijuana Establishments shall not be located within five hundred (500) feet of the following uses, said distance to be measured in a straight line from the nearest property line of the proposed Marijuana Establishment to the nearest property line of a lot containing:
 - 1) A public or private school providing education in kindergarten through grade 12
 - 2) A licensed and/or registered daycare or preschool
 - 3) A public library
 - 4) A public playground or park
- b. All aspects of a Marijuana Establishment relative to the acquisition, cultivation, possession, processing, sales, distribution, dispensing, or administration of marijuana, products containing marijuana, related supplies, or educational materials must take place at a fixed location within a fully enclosed building and shall not be visible from the exterior of the building.
- c. No outside storage of marijuana, related supplies, or educational materials is permitted.

d. Ventilation – all Marijuana Establishments shall be ventilated in such a manner that:

- 1) No pesticides, insecticides or other chemicals or products used in the cultivation or processing are dispersed into the outside atmosphere; and
- 2) No odor from marijuana or its processing can be detected by a person with an unimpaired and otherwise normal sense of smell at the exterior of the Marijuana Establishment or at any adjoining use or property.

No smoking, burning, consumption, or use of marijuana or any product containing marijuana shall be permitted on the premises of a Marijuana Establishment.

Many Rivers LLC was granted a host community agreement by the Town of Shrewsbury on September 14, 2021, we plan to follow the use regulations for permitted use at our 299 Hartford Turnpike, Shrewsbury, MA location.

Many Rivers has thoroughly reviewed all local codes, ordinances and bylaws as they apply to the physical address of the proposed Marijuana Delivery Operator Establishment, and in consultation with attorney and advisors determined that the physical address for the proposed Establishment is in compliance with local codes, ordinances, and bylaws.

We will also continue to communicate with the Town on a regular basis to remain updated and compliant with any changes or additions to local zoning.



Community Outreach Meeting Attestation Form

Instructions

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

Attestation

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

1. The Community Outreach Meeting was held on the following date(s): 12-1-2022
2. At least one (1) meeting was held within the municipality where the ME is proposed to be located.
3. At least one (1) meeting was held after normal business hours (this requirement can be satisfied along with requirement #2 if the meeting was held within the municipality and after normal business hours).



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

a. Date of publication:

11-15-2022

b. Name of publication:

THE TELEGRAM
& GAZETTE

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

a. Date notice filed:

11-14-2022

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

a. Date notice(s) mailed:

11-18-2022

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



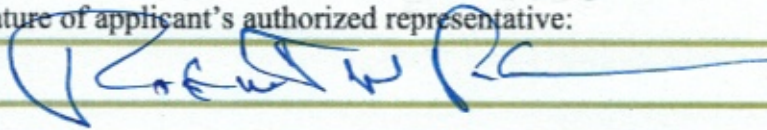
Name of applicant:

MANY RIVERS LLC

Name of applicant's authorized representative:

ROBERT PERLMAN

Signature of applicant's authorized representative:



LOCALiQ NEW ENGLAND

PO Box 631210 Cincinnati, OH 45263-1210

PROOF OF PUBLICATION

Rob Perlman
Many Rivers LLC
41 Eaton RD W
Framingham MA 01701-2603

STATE OF MASSACHUSETTS, COUNTY OF WORCESTER

The Telegram & Gazette, a newspaper distributed in the county of Worcester, published in the City of Worcester, County of Worcester, State of Massachusetts printed and published and personal knowledge of the facts herein state and that the notice hereto annexed was Published in said newspapers in the issues dated on:

11/15/2022

and that the fees charged are legal.
Sworn to and subscribed before on 11/15/2022

Legal Clerk

Notary, State of WI, County of Brown

My commission expires

Publication Cost: \$113.28

Order No: 8056431

Customer No: 726442

PO #:

of Copies:
1

THIS IS NOT AN INVOICE!

Please do not use this form for payment remittance.

VICKY FELTY
Notary Public
State of Wisconsin

Notice is hereby given that Many Rivers LLC will hold a Community Outreach Meeting for a proposed Adult-Use Cannabis Home Delivery Operator Establishment on December 1, 2022 at 6 pm, Meeting room A at the Shrewsbury Public Library, 609 Main St. Shrewsbury, MA.

The purpose of this public meeting is to provide interested parties with an opportunity to ask questions and receive answers from company representatives about the proposed facility and operations. The proposed siting is 299 Hartford Turnpike, Shrewsbury, MA, 01545. Please note that the meeting agenda and materials to be presented will be available electronically in advance of the meeting.

To access the agenda and meeting materials, please use this link below.

<https://drive.google.com/file/d/1C04pl-jHKcnUt8Skw0N40mvGiKh1l7x/view?usp=sharing>

You will have an opportunity to ask questions and provide feedback during the meeting at the conclusion of the presentation.

If you have a question you would like to submit prior to the meeting, please email RWPerlman@gmail.com with the subject line "Shrewsbury Community Outreach Meeting" no later than 1:00pm on December 1, 2022.

November 15, 2022

Subject: Community Outreach Public Notice

RECEIVED
TOWN CLERK'S OFFICE
2022 NOV 14 PM 2:24
SHREWSBURY, MASS

Dear Resident or Property Owner,

Notice is hereby given that Many Rivers LLC will hold a Community Outreach Meeting for a proposed Adult-Use Cannabis Home Delivery Operator Establishment on **December 1, 2022 at 6 pm, Meeting Room A** at the Shrewsbury Public Library, 609 Main St. Shrewsbury, MA.

The purpose of this public meeting is to provide interested parties with an opportunity to ask questions and receive answers from company representatives about the proposed facility and operations. The proposed siting is 299 Hartford Turnpike, Shrewsbury, MA, 01545.

Please note that the meeting agenda and materials to be presented will be available electronically in advance of the meeting. To access the agenda and meeting materials, please use this link below.

<https://drive.google.com/file/d/1C04pl-jHKcnUt8Skw0N40mvGiKhjll7x/view?usp=sharing>

You will have an opportunity to ask questions and provide feedback during the meeting at the conclusion of the presentation.

If you have a question you would like to submit prior to the meeting, please email RWPerlman@gmail.com with the subject line "Shrewsbury Community Outreach Meeting" no later than 1:00pm on December 1, 2022.

Subject: Community Outreach Public Notice

Dear Resident or Property Owner,

Notice is hereby given that Many Rivers LLC will hold a Community Outreach Meeting for a proposed Adult-Use Cannabis Home Delivery Operator Establishment on **December 1, 2022 at 6 pm, Meeting Room A** at the Shrewsbury Public Library, 609 Main St. Shrewsbury, MA.

The purpose of this public meeting is to provide interested parties with an opportunity to ask questions and receive answers from company representatives about the proposed facility and operations. The proposed siting is 299 Hartford Turnpike, Shrewsbury, MA, 01545.

Please note that the meeting agenda and materials to be presented will be available electronically in advance of the meeting. To access the agenda and meeting materials, please use this link below.

<https://drive.google.com/file/d/1C04pl-jHKcnUt8Skw0N40mvGiKhjll7x/view?usp=sharing>

You will have an opportunity to ask questions and provide feedback during the meeting at the conclusion of the presentation.

If you have a question you would like to submit prior to the meeting, please email RWPerlman@gmail.com with the subject line "Shrewsbury Community Outreach Meeting" no later than 1:00pm on December 1, 2022.

MANY RIVERS LLC – REVISED & AMENDED POSITIVE IMPACT PLAN

Many Rivers, LLC (“Many Rivers”) was founded by a Social Equity Program participant. Many Rivers plans to positively impact the following:

Past or present residents of areas of disproportionate impact as defined by the Cannabis Control Commission (“CCC”).

1. The City of Worcester, which is adjacent to Many Rivers’ location has been identified by the CCC as disproportionately impacted;
2. CCC designated Certified Economic Empowerment Priority recipients;
3. CCC designated Social Equity Program participants;

Many Rivers will outline the following goals, programs and measurements with respect to this Positive Impact Plan (“Plan”) as defined by the CCC.

GOALS: Many Rivers’ goals for this Positive Impact Plan are as follows:

GOAL 1: Reduce barriers to entry in the commercial adult-use cannabis industry, by providing employment opportunities to communities that historically have been adversely impacted by the policy choices of the past by recruiting from and giving preference to:

1. To employ 10% of workforce from past and present Worcester residents from the following census tracts from Worcester County:

US Census Tract 7302
US Census Tract 7305
US Census Tract 7310.02
US Census Tract 7312.03
US Census Tract 7312.04
US Census Tract 7313
US Census Tract 7314
US Census Tract 7315
US Census Tract 7317
US Census Tract 7318
US Census Tract 7323.02
US Census Tract 7324
US Census Tract 7327
US Census Tract 7330

Data compiled from HR records

POSITIVE IMPACT PLAN

GOAL 1 PROGRAM:

1. Many Rivers will work with local job recruitment and other organizations such as the Worcester County Sheriff's Office to participate in job fairs and/or get their assistance in providing leads of qualified applicants, with a specific focus on hiring individuals from CCC designated "areas of disproportionate impact" of Worcester County.

2. Many Rivers will conduct its own job fairs as needed, at least one annually to meet its staffing needs. The fairs will be promoted and advertised via newspapers (Community Advocate and Worcester Telegram & Gazette), as well as social media and appropriate Worcester Country websites.

All of these individuals will meet Many Rivers' criteria for employment as well as the CCC requirements for marijuana establishment agents.

GOAL 1 METRIC:

Many Rivers will count the number of employees hired resulting from this Plan and compare to the Plan's goal of 10% of Many Rivers' employees.

GOAL 2: Develop a supply chain of cannabis products with Economic Empowerment Priority and Social Equity Program owned businesses.

GOAL 2 PROGRAM:

1. Many Rivers will research and identify CCC licensed Economic Empowerment and Social Equity owned businesses from the CCC Licensing Tracker to potentially acquire cannabis products from.

2. Negotiate long-term supply agreements with Economic Empowerment and Social Equity owned businesses to acquire cannabis products.

3. Execute wholesale supply agreements to acquire cannabis products with at least two (2) Economic Empowerment and Social Equity owned businesses over the first 12 months of operations.

GOAL 2 METRIC:

Execute at least two (2) wholesale supply agreements within year one of operation with an Economic Empowerment or Social Equity owned businesses to acquire cannabis products. Many Rivers will quarterly assess the supply chain partners which are Economic Empowerment and Social Equity owned businesses.

POSITIVE IMPACT PLAN

METRICS & PLAN ADMINISTRATION:

Many Rivers Positive Impact Plan will be administered by the Managing Partners and/or the HR Manager or General Manager. They will be responsible for developing specific initiatives, creating partnerships and achieving measurable outcomes to meet the Plan's goals. Many Rivers will audit the Plan annually upon license renewal and will disclose and track measurement metrics.

Disclosures

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



The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$500.00

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

Certificate of Organization

(General Laws, Chapter)

Identification Number: 001514036

1. The exact name of the limited liability company is: MANY RIVERS LLC

2a. Location of its principal office:

No. and Street: 41 EATON ROAD WEST

City or Town: FRAMINGHAM

State: MA

Zip: 01701

Country: USA

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

No. and Street: 41 EATON ROAD WEST

City or Town: FRAMINGHAM

State: MA

Zip: 01701

Country: USA

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

TO CONDUCT ALL LAWFUL BUSINESS PURSUANT TO THE LAWS OF THE COMMONWEALTH OF MASSACHUSETTS. TO SECURE A LICENSE FROM THE CANNABIS CONTROL COMMISSION. THE ENTITY WILL NOT ENGAGE IN THE SALE OR CULTIVATION OF MARIJUANA OR ANY OF THE RELATED REGULATED PRODUCTS WITHOUT A LICENSE FROM THE CANNABIS CONTROL COMMISSION. TO CARRY ON ANY BUSINESS OR OTHER ACTIVITY WHICH MAY BE LAWFULLY ENGAGED IN BY A BUSINESS CORPORATION ORGANIZED UNDER THE BUSINESS CORPORATION LAW OF THE COMMONWEALTH OF MASSACHUSETTS, WHETHER OR NOT RELATED TO THE PURPOSES ENUMERATED. THE CORPORATION MAY BE A PARTNER IN ANY BUSINESS ENTERPRISE IT WOULD HAVE POWER TO CONDUCT BY ITSELF AND MAY CARRY ON ANY PERMISSIBLE BUSINESS ENTERPRISE EITHER ALONE (WHETHER AS A PRINCIPAL, AGENT, CONTRACTOR OR OTHERWISE), THROUGH A WHOLLY OR PARTLY OWNED SUBSIDIARY, OR IN CONJUNCTION, THROUGH A JOINT VENTURE OR OTHER ARRANGEMENT, WITH ANY CORPORATION, ASSOCIATION, TRUST, FIRM OR INDIVIDUAL.

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:

Name: ROBERT W PERLMAN

No. and Street: 41 EATON ROAD WEST

City or Town: FRAMINGHAM

State: MA

Zip: 01701

Country: USA

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

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

Title	Individual Name	Address (no PO Box)
-------	-----------------	---------------------

	First, Middle, Last, Suffix	Address, City or Town, State, Zip Code
MANAGER	ROBERT W PERLMAN	41 EATON ROAD WEST FRAMINGHAM, MA 01701 USA

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
SOC SIGNATORY	ROBERT W PERLMAN	41 EATON ROAD WEST FRAMINGHAM, MA 01701 USA

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
REAL PROPERTY	ROBERT W PERLMAN	41 EATON ROAD WEST FRAMINGHAM, MA 01701 USA

9. Additional matters:

**SIGNED UNDER THE PENALTIES OF PERJURY, this 14 Day of June, 2021,
ROBERT W PERLMAN**

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

THE COMMONWEALTH OF MASSACHUSETTS

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

June 14, 2021 05:02 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

MANY RIVERS LLC OPERATING AGREEMENT

This OPERATING AGREEMENT (this "Agreement") of MANY RIVERS LLC, a Massachusetts limited liability company (the "Company") is dated June 14, 2021.

The Company was formed pursuant to a Certificate of Organization, dated June 14, 2021, which was filed in the office of the Secretary of State of the Commonwealth of Massachusetts on June 14, 2021 (the "Certificate of Organization"). It is agreed:

1. The name of the Company is MANY RIVERS LLC.
2. The general character of the business of the Company is to engage in the business of the delivery and distribution of cannabis products where and when licensed to do so; to engage in any activities directly or indirectly related or incidental thereto; and to engage in any other activity in which a limited liability company organized under the laws of the Commonwealth of Massachusetts may lawfully engage, all upon the terms and conditions set forth in this Agreement.
3. The Company shall be managed by a sole Manager and may hire one or more employees and designate such persons having such titles and duties as may be specified from time to time by the Manager. Each Member and Manager shall be deemed to be an authorized person with full power and authority to execute the Certificate of Organization and any amendments thereto.
4. The sole member of the Company (the "Member") is Robert W. Perlman.
5. The sole Manager of the Company is Robert W. Perlman. All of the actions heretofore taken by the Company, and those acting in the name and on behalf of the Company are hereby authorized, ratified, and confirmed in all respects; and, further such Manager is hereby authorized, in the name and on behalf of the Company, to do any and all such acts and things and to execute and deliver any and all such other documents, instruments and certificates as may, in the opinion of said Manager be necessary, convenient or desirable to effectuate the purposes of the Company, the execution of such documents and taking of such actions to be conclusive evidence of the Manager's authority thereunder. Any reference to Robert W. Perlman as "Owner", President, Chief Executive Officer and/or CEO of the Company in any Company-related document shall be deemed to mean Manager of the Company.
6. The Company shall continue until such time as it shall be terminated by action of the Member.
7. The Member agrees to make an initial contribution to the capital of the Company in the amount of \$1000. Any additional capital contributions of the Member shall be in such amounts as determined by the Member.
8. The capital contribution of the Member may from time to time be returned as determined by the Member.
9. One or more new members may be admitted to the Company upon the approval of the Member.
10. This Agreement may be amended by the Member.

[SIGNATURE PAGE FOLLOWS]

OPERATING AGREEMENT OF MANY RIVERS LLC

IN WITNESS WHEREOF, the undersigned has executed this Operating Agreement as of the day and year first written above.

MEMBER:

A handwritten signature in blue ink, appearing to read 'Robert W. Perlman', is written over a horizontal line.

Robert W. Perlman

Business Plan

Many Rivers LLC is in the process of securing a Marijuana Delivery Operator license from the Cannabis Control Commission. The company will purchase marijuana flower and marijuana products (edibles, lotions, etc.) on a wholesale basis from licensed cultivators and product manufacturers and store these products in a secure and alarm-equipped inventory room. Many Rivers will operate from a warehouse facility. Consumer orders will be placed over the Internet via the company's ordering platform.

To place an order, a consumer must sign up in advance and provide their full legal name as it appears on a valid and unexpired government-issued photo identification card ("ID"), the residential address where the order will be delivered, an email address and cell phone number (capable of receiving a text message), their date of birth (to confirm they are at least 21 years of age), and an upload of their ID. Many Rivers staff confirms the ID is valid, the information input matches the information on the ID, and that the address of the consumer's residence and the delivery address, if different, is not a restricted delivery address (next two paragraphs).

Marijuana Delivery Operators are "prohibited from delivering to college or university dormitories; and federal public housing identified at <https://resources.hud.gov/>." [see 935 CMR 500.145 (2)(d)].

The Commission defines Residence as "a house, condominium or apartment, **and excludes**, unless otherwise authorized by law, dormitories or other on-campus college or university housing; bed-and- breakfast establishments, hotels, motels or other commercial hospitality operations; and federal public housing identified at <https://resources.hud.gov/>, shelters or residential programs." (**emphasis added**)

With these confirmations complete, a consumer may then place an online order.

Orders are packed by company employees. Only employees may work on site (temporary staffing agents or contract laborers are prohibited by regulation). All employees are pre-screened by the Commission and must have a valid Commission-issued Marijuana Establishment Agent card or they are not eligible to work. On a recurring annual basis operational staff must complete a Responsible Vendor Training program.

Packed orders are separated by route and placed in a secure, locked vessel. The vessel is loaded into the vehicle and locked in place so as to be tamper-resistant and theft-proof.

Vehicles are staffed with a driver and delivery agent. No firearms are allowed by Commission regulation. One staff must be with the vehicle at all times the vehicle has marijuana on board. Vehicles must be owned or leased by the Marijuana Delivery Operator. Vehicles cannot have any markings on them and must be outfitted with additional security including 2-way communications, cameras, GPS, and the locked in place inventory locker. Only pre-packed orders may be loaded into the vehicle. Delivered inventory is limited to a maximum total value per vehicle of \$10,000. Unlike California, which allows delivery vehicles to carry inventory and fill orders on the fly as the vehicle drives to a customer (the so-called ice cream truck model), Massachusetts prohibits that approach.

Deliveries can take place between 8:00 AM and 9:00 PM.

Drivers leave with a manifest for each order, either hard copy or on an electronic tablet.

Driver teams must check in with dispatch once every 30 minutes throughout the delivery route (500.105(13)(e)7 and 500.110(8)(a)5b) and 500.145(4)(j). We supplement that regulatory requirement by requiring our delivery teams to check in within 5 minutes of completing a delivery.

Delivery agents (the staff member who retrieves the order from the locked storage unit in the vehicle, brings it to the door, checks the ID, and hands the order over), must wear body cameras to record all customer interactions.

The delivery agent brings the order to the customer's door and checks their ID with a portable, electronic, ID scanner before handing the order over. Orders can only be handed to the name on the manifest. If a wife places an order but only the husband is home, the delivery will not be completed. If no one is home or the customer is not available, the order is returned to the warehouse. Orders can only be handed to the intended recipient.

Order deliveries cannot be diverted to another address or left in a "safe place" to be retrieved later.

All orders are pre-paid and so delivery agents do not handle cash (other than gratuities). All cash collected must, by regulation, be deposited into a secure cash box, affixed to the vehicle interior. Generally speaking, drivers do not carry cash. Customers pay at the time they place their order.

The warehouse facility does not allow walk-in business. Consumers are restricted from entering and cannot visit the facility to pick up an order. Online orders may only be delivered to the consumer's residential address as listed on their ID.

The warehouse employs order processors, order packers, a dispatcher, and other support staff. All inventory is tracked in the Commission's METRC system¹ and sales must be reported in detail to the Commission. There is no wiggle room for error or omission.

Orders are packed throughout the day. Generally, drivers will leave the facility in shifts. The first wave leaves around 7:00 AM to 7:30 AM, to arrive at their first stop by 8:00 AM. Subject to demand, a second wave of drivers will leave between 1:00 PM and 3:00 PM and will complete their last delivery by 9:00 PM.

According to the U.S. Census, "[Ecommerce sales in the second quarter of 2020 accounted for 16.1 percent of total sales.](#)" We estimate the Massachusetts retail adult-use cannabis market at \$2 billion (see our market sizing estimate further in this request) and expect the market to reach that level by 2024. We have previously estimated the market will be serviced by 350 to 400 retail stores. Based upon the recent regulatory adjustments to the home delivery model, we expect home delivery to capture 30% of the regulated adult-use marijuana market. Consider that at present numerous unregulated home delivery operators service thousands of customers.

Home delivery might bring more of these consumers into the regulated (and taxed) adult-use market.

While it is difficult to estimate the ultimate total number of home delivery operators, like other license classes, numerous applicants will not complete the journey or will find their plans derailed along the process. We believe that ultimately there will be no more than 35 Home Delivery Operators (fully stocking delivery service firms versus the courier model). The table shows the revenue potential should these projections come to fruition.

Total Addressable Market (Massachusetts by 2024)	2,000,000,000
Census Ecommerce (online) Retail, Q2, 2020	16.1%
Home Delivery sales @ 16.1% market penetration	322,000,000
Projected Home Delivery Operator Licensee Count	35
Average Revenue @ 16.1% Home Deliver	9,200,000
Additional Market Share to get to 30% Home Delivery Sales	13.9%
Additional Home Delivery sales	278,000,000
Total Estimated Home Delivery Market Value (\$2B x 30%)	600,000,000
Projected Operator Count	35
Average Revenue @ 30% Home Delivery	17,142,857
Massachusetts Local 3% Tax Option	514,286
Community Impact Fee (@ 3%)	514,286
Base Municipal Revenue Opportunity	1,028,571

It should be noted these estimates are based upon a longer-term view of the Massachusetts market. At present, Massachusetts prices are approximately 40% higher than other developed states (specifically Colorado). Hence, until prices come into equilibrium, the municipal revenue opportunity is likely closer to \$1,450,000 ($\$1,028,571 \times 140.7\% = \$1,447,337$).

[How Home Delivery Currently Works](#)

While many constituents of the Massachusetts marijuana home delivery discussion view home delivery as an entirely new process, in truth, home delivery has been functioning for years, very successfully. Success can be measured by delivery operators' ability to remain under law enforcement's radar. In days of old, one would call their preferred dealer, meet, and complete the transaction. Those days are long gone. In the current climate, unregulated delivery operators service nearly every municipality in the state; and there are many of them. Some have web sites and carefully screen customers to avoid law enforcement. Others use Instagram. Under the Instagram model, the operator will post a menu, customers post their requests, orders are packed and delivered, and customers pay either with cash or one of a handful of peer-to-peer payment platforms – from Venmo to Zelle to PayPal to ApplePay.

In June, 2021, journalist Eoin Higgins [researched drug use during the pandemic and found](#) that “demand for drugs increased during the pandemic. The CDC in an August 2020 study [reported](#) that the psychological toll of the pandemic led to 13.3% of respondents either starting or

increasing substance use due to the mental health stress of dealing with the pandemic.” Eoin interviewed three dealers. One dealer explained that “the business was mostly ‘phone calls and then pickups and drop offs and driving,’ Dion² told me— nothing more intense.” Another dealer explained, “When the pandemic hit... people were bored and wanted to get high. That led to a booming market for edibles for people who didn't normally buy drugs...

I was delivering in the mail boxes of nurses and lawyers and overachievers and all kinds of A-students that don't know how to get weed otherwise.”

An east coast dealer (who might be from Massachusetts based upon the description of the local legalized market) “used a curbside delivery method. He would drop product off in mailboxes, especially during the height of the pandemic and when dealing with the older end of his clientele... What they would do is drop money in the mailbox and text me,” Scott said. “Then when I got there, I would just drop [the product] in the mailbox, take the money and then dip out.”

“Ben also used mailboxes for curbside delivery, and found that the impersonal deliveries ended the necessary social aspect of dealing.”

As Higgin’s research shows, much like the about-to-arrive regulated delivery market, operators make ample use of electronic communications and unmarked vehicles. However, unregulated delivery operators do not pay taxes, pay no community impact fees, and do not pay payroll taxes or benefits to staff. They do, however, remain quietly under the radar causing no disruptions within the communities they serve.

Regulated and licensed delivery operators such as Many Rivers, will collect and remit sales taxes, will pay community impact fees, will pay payroll taxes and provide employee benefits.

¹ METRC is the system of record (the SOR) and referred to as the SOR in the regulations

² (the pseudonym for this dealer)

Home Delivery Operator
Applicant: Many Rivers LLC

Plan to Obtain Liability Insurance

Many Rivers will obtain a liability insurance policy including general liability and product liability insurance coverage of no less than \$1 million per occurrence and \$2 million in aggregate annually. The deductible for each policy will be no higher than \$5,000 per occurrence.

Vehicles used for delivery will be insured for liability coverage in an amount not less than \$1,000,000 combined single limit pursuant to *935 CMR 500.145(4)*; *935 CMR 500.101(2)*; *935 CMR 500.105(10)*

Coverage will be arranged by:

Charles River Insurance, 5 Whittier Street, Framingham, MA 01701

William Perrier - Producer

Home Delivery Operator

Applicant: Many Rivers LLC

Record Keeping Procedures

General Overview

Many Rivers' policies regarding recordkeeping and record-retention will ensure the maintenance, safe keeping, and accessibility of critical documents. Electronic and wet signatures are accepted forms of execution of documents. Records will be stored at Many Rivers' facility in a locked room designated for record retention or in a password protected, secure, cloud-based location. All written records will be available for inspection by the Commission and the host community, upon request.

Business records are reviewed on a quarterly basis to assure records are complete and in order. Record-keeping procedures are updated on an as-needed basis.

Corporate Records are defined as those records that require, at a minimum, annual reviews, updates, and renewals, including:

- Insurance Coverage:
 - Directors & Officers Policy
 - Product Liability Policy
 - General Liability Policy
 - Umbrella Policy
 - Workers Compensation Policy
 - Employer Professional Liability Policy
 - Third-Party Laboratory Contracts
- Commission Requirements:
 - Annual Agent Registration
 - Annual Marijuana Establishment Registration
- Local Compliance:
 - Certificate of Occupancy
 - Special Permits
 - Site Plan Approvals
 - As-Built Drawings
- Corporate Governance:
 - Secretary of State Annual Report Filing

Business Records are defined as those records that require ongoing maintenance and updates.

Many Rivers shall keep and maintain its records in accordance with generally accepted accounting principles. Such records shall be available for inspection by the Commission, upon request and shall include, but not be limited to, all financial records required in any section of 935 CMR 500.000: *Adult Use of Marijuana*, and business records, in accordance with 935 CMR 500.105(e). These records can be electronic or hard copy (preferably electronic) and at minimum include:

- Assets and liabilities
- Monetary transactions

Home Delivery Operator

Applicant: Many Rivers LLC

- Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers
- Sales records including the quantity, form, and cost of Marijuana Products
- Salary and wages paid to each agent, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with Many Rivers, including members, if any
 - See also 935 CMR 500.105(9)

Personnel Records at a minimum include:

- Job descriptions for each agent, as well as an organization chart listing the positions
- A personnel record for each Marijuana Establishment Agent. Such records will be maintained for at least seven (7) years after termination of the agent's affiliation with Many Rivers and will include, at a minimum, the following:
 - All materials submitted to the Commission pursuant to 935 CMR 500.030(2)
 - All background check reports obtained in accordance with 935 CMR 500.030
 - Documentation of verification of references
 - The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters
 - Documentation of periodic performance evaluations
 - A record of any disciplinary action taken
 - Notice of completed Responsible Vendor Training and eight-hour related duty training
 - A staffing plan that will demonstrate adequate staff coverage
 - Personnel policies and procedures

Inventory Records

The record of each inventory review will include, at a minimum, the date of the review, a summary of the findings, and the names, signatures, and titles of the agents who conducted the review.

Incident Reporting Records

Within ten (10) calendar days, Many Rivers will provide written notice to the Commission of any incident described in 935 CMR 500.110(7)(a), by submitting an incident report, detailing the incident, the investigation, the findings, resolution (if any), confirmation that the Local Police Department and Commission were notified within twenty-four (24) hours of discovering the breach, and any other relevant information. Reports and supporting documents, including photos and surveillance video related to a reportable incident, will be maintained by Many Rivers for no less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities upon request.

Home Delivery Operator

Applicant: Many Rivers LLC

Visitor Records

A visitor sign-in and sign-out record will be maintained by the Security Agents. The record will include the visitor's name, address, organization or firm, date, time in and out, and the name of the authorized agent who will be escorting the visitor.

Waste Disposal Records

When Marijuana or Marijuana Products are disposed of, Many Rivers will create and maintain a written record of the date, the type and quantity disposed of or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two Many Rivers' agents present during the disposal or handling, with their signatures. Many Rivers will keep disposal records for at least seven (7) years. This period will automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.

Security Records

A current list of authorized agents and service personnel that have access to the surveillance room will be available to the Commission upon request. Twenty-four (24) hour recordings from all video cameras that are available for immediate viewing by the Commission upon request and that are retained for at least ninety (90) calendar days.

Transportation Records

Many Rivers will retain all shipping manifests for a minimum of seven (7) years and make them available to the Commission and host community upon request.

Agent Training Records

Documentation of all required training, including training regarding privacy and confidentiality requirements, and a signed statement of the individual indicating the date, time, and place he or she received the training, the topics discussed and the name and title of the presenter(s).

Closure

In the event Many Rivers ceases operations, all records will be kept for at least seven (7) years at Many Rivers' expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission and host community. In addition, Many Rivers will communicate with the Commission during the closure process and accommodate any additional requests the Commission, the host community, or other agencies may have.

Written Operating Policies and Procedures

Policies and Procedures related to Many Rivers' operations will be updated on an ongoing basis as needed and undergo a review by the CO/General Manager on an annual basis.

Policies and Procedures will include the following:

- Security measures in compliance with 935 CMR 500.110
- Agent security policies, including personal safety and crime prevention techniques

Home Delivery Operator

Applicant: Many Rivers LLC

- A description of Many Rivers' hours of operation and after-hours contact information, which will be provided to the Commission and the host community, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000
- Storage of Marijuana in compliance with 935 CMR 500.105(11)
- Description of the various varieties (strains) of Marijuana to be sold, and the form(s) in which Marijuana will be dispensed
- Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.160
- A staffing plan and staffing records in compliance with 935 CMR 500.105(9)
- Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies
- Alcohol, smoke, and drug-free workplace policies
- A plan describing how confidential information will be maintained
- Policy for the immediate dismissal of any dispensary agent who has:
 - Diverted Marijuana, which will be reported to the Local Police Department and to the Commission
 - Engaged in unsafe practices with regard to Many Rivers' operations, which will 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
- A list of all executives of Many Rivers must be made available upon request by any individual. This requirement pursuant to 935 CMR 500.105(1)(m) may be fulfilled by placing this information on Many Rivers' website
- Policies and procedures for the handling of cash on Many Rivers' premises including but not limited to storage, collection frequency and transport to financial institution(s)
- Policies and procedures to prevent the diversion of Marijuana to individuals younger than 21 years old
- Many Rivers' personnel policies and procedures, shall include, at a minimum, a Code of ethics; a whistle-blower policy; and a policy which notifies persons with disabilities of their rights under <https://www.mass.gov/service-details/about-employment-rights> or a comparable link, and includes provisions prohibiting discrimination and providing reasonable accommodations; 935 CMR 500.105(9)

Record-Retention

Many Rivers will meet Commission and the host community recordkeeping requirements and retain a copy of all records for seven (7) years, unless otherwise specified in the regulations.

Monthly Systems Audit for Malware

Pursuant to 935 CMR 500.140(6)(d), Many Rivers will conduct a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. If any such malware is found, Many Rivers will immediately report the occurrence to the Commission and

Home Delivery Operator

Applicant: Many Rivers LLC

assist in any subsequent investigation into the matter. Many Rivers will maintain a record of the monthly analyses and will make it available for inspection by the Commission upon request. Many Rivers will cooperate with the Commission and the Department of Revenue to ensure compliance with any and all taxes in accordance with the laws of the Commonwealth and 935 CMR 500.000. Many Rivers will utilize separate accounting practices at the point of sale to track Marijuana Product sales and non-Marijuana sales.

Other

Records of sales of Marijuana Accessories and Marijuana Establishment Branded Goods shall be maintained by Many Rivers, but need not be tracked in the Seed-to-sale SOR

For non-Marijuana or non-Marijuana Product sales, Many Rivers shall comply with Massachusetts tax laws, and DOR rules and regulations including, but not limited to, 830 CMR 62C.25.1: *Record Retention and DOR Directive 16-1* regarding recordkeeping requirements.

Home Delivery Operator
Applicant: Many Rivers LLC

Maintenance of Financial Records

Many Rivers shall implement the following policies for Recording Sales:

1. Utilize a point-of-sale ("POS") system approved by the Commission, in consultation with the Massachusetts Department of Revenue ("DOR").
2. Utilize a sales recording module approved by the DOR.
3. Many Rivers shall not utilize any software or other methods to manipulate or alter sales data at any time or under any circumstances.
4. Many Rivers shall conduct a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. Many Rivers shall maintain records that it has performed the monthly analysis and produce that analysis upon request to the Commission. If Many Rivers determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data:
 - a. It shall immediately disclose the information to the Commission;
 - b. It shall cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and
 - c. Take such other action directed by the Commission to comply with 935 CMR 500.105.(e)
5. Many Rivers shall comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements.
6. Many Rivers shall adopt separate accounting practices at the POS for marijuana and marijuana product sales, and non-marijuana sales.
7. Many Rivers shall allow the Commission and the DOR audit and examine the POS system in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.000: *Adult Use of Marijuana*.
8. Many Rivers shall maintain the following business records:
 - a. Assets and liabilities
 - b. Monetary transactions
 - c. Books of accounts
 - d. Sales records; and
 - e. Salary and wages paid to each employee. 935 CMR 500.105(9)

Home Delivery Operator
Applicant: Many Rivers LLC

Staffing Plan & Personnel Policies

A. Positions

- Managing Partners
Responsible for overall direction and strategy of the business
Responsible for all management operations
- General Manager
Management of operations
- Director of Logistics
Responsible for transportation and delivery logistics
- Director of Product Procurement
Manages all supplier relationships
- Customer Service Manager
Manages the order intake process
- Order Processor
Receives orders and verifies identification and address
- Order Packer
Packs orders transmitted from Order Processor
- Dispatch
Monitors vehicle locations, creates delivery routes, and creates manifests. Monitors routine communications with delivery teams and notifies customers when delivery team is 5 to 10 minutes away
- Driver
Drives the delivery vehicle and maintains vehicle security
- Driver Lead
Monitors traffic, handles communications, delivers orders to customer, checks ID, handles manifest and paperwork
- Bookkeeper/Accountant
- Human Resource Director
- Information Technology Director
- Office Manager
- Marketing and Social Media Director

B. Hours

- Staffing is based upon a 120-hour per week operating schedule

Home Delivery Operator

Applicant: Many Rivers LLC

Staffing Records: see Record Keeping Procedures file

Overview of Personnel Policies and Procedures

Standard Employment Practices

Many Rivers' values the contributions of all staff. The Company offers competitive wage and benefits packages. The Company culture promotes a proper work-life balance, boasts a transparent and accessible management team, and fosters a work ethic that focuses on the mission of the Company.

Written Policies

Written policies address, inter alia, the Family and Medical Leave Act (FMLA), the Consolidated Omnibus Budget Reconciliation Act (COBRA), equal employment opportunity, discrimination, harassment, the Employee Retirement Income Security Act (ERISA), disabilities, workers' compensation, maintenance of personnel files, privacy, email policy, 935 CMR 500.000 et seq., holidays, hours, sick time, personal time, overtime, performance reviews, disciplinary procedures, working hours, pay rates, overtime, bonuses, veteran preferences, drug testing, personnel policies, military leaves of absence, bereavement leave, jury duty, CORI checks, smoking, HIPAA, patient confidentiality, and compliance hotline.

Diversion & Related Dismissal Policy

Any agent who has diverted Marijuana, has engaged in unsafe practices regarding operation of a Marijuana Establishment, and/or has been convicted of or pled guilty to a felony for distribution to minors, will face immediate termination.

Many Rivers shall immediately dismiss (zero tolerance) – and immediately report to the Commission and the local Police Department – any party who has:

- Diverted Marijuana
- Engaged in unsafe practices regarding the operation of a Marijuana Establishment; including but not limited to: (1) theft; (2) improper disposal of Marijuana or Marijuana Products; (3) use of drugs or alcohol while on the premise; or (4) any other workplace behavior which, in the discretion of management, is unsafe or places the Company, or any of its staff, at legal, regulatory, or personal risk
- Been convicted or entered a plea of guilty, nolo contendere, or admitted sufficient facts to support a felony drug offense involving distribution to a minor
- Used alcohol or illegal narcotics, or smokes, in the workplace (smoking behind the premise while on breaks is allowed, provided cigarette butts are properly disposed of)

All employees will be required to sign a written acknowledgment of receipt of the anti-diversion policy as part of the onboarding process. This signed acknowledgment shall be stored in each employee's file.

Investigations

Many Rivers will investigate any complaints or concerns identified or raised internally or externally in order to stay in compliance with 935 CMR 500.000 et seq.

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Disciplinary Policies

Purpose

The Company applies a progressive discipline policy, designed to provide structured corrective action to improve and prevent a recurrence of undesirable behavior. These policies are described below. Management reserves the right to combine or skip steps depending upon the facts of each situation and the nature of the offense. The level of disciplinary intervention may also vary. Some of the factors that will be considered are whether the offense is repeated despite coaching, counseling, and/or training; the employee's work record; and the impact the employee's performance, conduct and/or attendance issues upon other staff and the organization as a whole.

Step 1: Counseling and Verbal Warning

Step 1 creates an opportunity for the applicable manager to schedule a meeting with an employee to bring attention to the existing performance, conduct, or attendance issue. The manager will review with the employee the nature of the problem and/or violation of Company policies and procedures. The supervisor is expected to clearly outline expectations and steps the employee must take to improve performance or resolve the problem.

Within five (5) business days, the manager will prepare a written report of the Step 1 meeting, which will be confirmed and signed by the employee, and will become part of the employee's personnel file.

Step 2: Written Warning

While it is hoped that the performance, conduct, or attendance issues that were identified in Step 1 have been corrected, Many Rivers recognizes that this may not always be the case. A written warning indicates an escalation of the performance, conduct, or attendance issues, and explains the consequences.

During Step 2, the manager will meet with the employee and review any additional incidents or information about the performance, conduct, or attendance issues as well as any prior relevant corrective action plans. The manager will outline the consequences for the employee of his or her continued failure to meet performance, conduct and/or attendance expectations. The manager will develop a written performance improvement plan (PIP) within five (5) business days of a Step 2 meeting. A warning outlining that the employee may be subject to additional discipline up to and including termination if immediate and sustained corrective action is not taken may also be included in the PIP.

Step 3: Suspension and Final Written Warning

There may be performance, conduct, or safety incidents so problematic and harmful that the most effective action may be the temporary removal of the employee from the workplace (suspension). When immediate action is necessary to ensure the safety of the employee or others, the manager may suspend the employee pending the result of an internal review and investigation.

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Suspensions that are recommended as part of the normal progression of the progressive discipline policies and procedures are subject to approval by either the CEO or COO.

Depending upon the seriousness of the infraction, an employee may be suspended without pay in full-day increments consistent with federal, state and local wage-and-hour employment laws. Non-exempt/hourly employees may not substitute or use an accrued paid vacation or sick day in lieu of the unpaid suspension. Due to Fair Labor Standards Act (FLSA) compliance issues, unpaid suspension of salaried/exempt employees is reserved for serious workplace safety or conduct issues. The CEO or COO will provide guidance so that discipline is administered without jeopardizing the FLSA exemption status.

Pay may be restored to an employee if an investigation of the incident or infraction absolves the employee.

Step 4: Recommendation for Termination of Employment

The last and most serious step in the progressive discipline procedure is a recommendation to terminate employment. Generally, the manager (CEO or COO) will utilize the progressive steps of this policy by first providing warnings, a final written warning, and/or suspension from the workplace before proceeding to a termination of employment. The Company reserves the right to combine and skip steps depending upon the circumstances of each situation and the nature of the offense, and an employee may be terminated without prior notice or disciplinary action. The manager's recommendation to terminate employment must be approved by the CEO.

Nothing in this policy provides any contractual rights regarding employee discipline or counseling nor should anything in this policy be read or construed as modifying or altering the employment-at-will relationship between Many Rivers and its employees.

Appeal Process

Any employee subject to a disciplinary action will have the opportunity to present information on their own behalf that may challenge information management relied upon in making the decision to issue the disciplinary action. The purpose of this appeal process is to provide insight into extenuating circumstances that may have contributed to the employee's performance, conduct and/or attendance issues, while allowing for an equitable solution.

If an employee does not present information on their own behalf during a step meeting, they will have three (3) business days after the meeting to present such information to the manager who conducted the meeting.

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Performance and Conduct Issues Not Subject to Progressive Discipline

Behavior that is illegal is not subject to progressive discipline and may be reported to local law enforcement. Theft, intoxication at work, threats, intimidation, fighting and other acts of violence are also not subject to progressive discipline and are grounds for immediate termination.

Documentation

Any employee subject to progressive discipline will be provided with copies of all relevant documentation related to the progressive discipline process, including all PIPs. The employee will be asked to sign copies of this documentation attesting to their receipt and understanding of the corrective action outlined in these documents. Copies of these documents will be placed in the employee's personnel file.

Selection Criteria

1. Management will price positions to market by using local, industry specific survey data
2. The market data will primarily include Marijuana-related businesses and will include survey data for more specialized positions
3. The system will evaluate external equity, which is the relative marketplace job worth of every Marijuana industry job directly comparable to similar jobs at Many Rivers, factored for general economic variances, and adjusted to reflect the local economic marketplace
4. The system will evaluate internal equity, which is the relative worth of each job in the organization when comparing the required level of job competencies, formal training and experience, responsibility and accountability of one job to another
5. The compensation system will be flexible enough to ensure that the Company is able to recruit and retain a highly-qualified workforce, while providing the structure necessary to effectively manage the overall compensation program

Agent Background Checks

- In addition to completing the Commission's Marijuana Establishment Agent registration process, all agents hired to work for Many Rivers will undergo a detailed background investigation prior to being granted access to the facility or commencing work duties
- Background checks will be conducted on all agents in their capacity as employees for Many Rivers pursuant to 935 CMR 500.100. The senior human resources officer will be registered with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: *iCORI Registration* and the Commission for purposes of determining the suitability of individuals for registration as a Marijuana Establishment Agent with the licensee
- For purposes of determining suitability based on background checks performed in accordance with 935 CMR 500.101(1), Many Rivers will consider:
 - All conditions, offenses, and violations, construed to conform to Massachusetts law
 - All criminal disqualifying conditions, offenses, and violations include the crimes of attempt, accessory, conspiracy, and solicitation (juvenile dispositions will not be considered as a factor for determining suitability)

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- Where applicable, all look back periods for criminal conditions, offenses, and violations included in 935 CMR 500.802 commence upon the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look back period will commence upon release from incarceration
- Suitability determinations will be made in accordance with the procedures set forth in 935 CMR 500.800. In addition to the requirements established in 935 CMR 500.800, Many Rivers will:
 - Comply with all guidance provided by the Commission and 935 CMR 500.802: Tables B through D to determine if the results of the background are grounds for Mandatory Disqualification or Presumptive Negative Suitability Determination
 - Consider whether offense(s) or information that would result in a Presumptive Negative Suitability Determination under 935 CMR 500.802. In the event a Presumptive Negative Suitability Determination is made, Many Rivers will consider the following factors:
 - Time since the offense or incident
 - Age of the subject at the time of the offense or incident
 - Nature and specific circumstances of the offense or incident
 - Sentence imposed and length, if any, of incarceration, if criminal
 - Penalty or discipline imposed, including damages awarded, if civil or administrative;
 - Relationship of offense or incident to nature of work to be performed
 - Number of offenses or incidents
 - Whether offenses or incidents were committed in association with dependence on drugs or alcohol from which the subject has since recovered
 - If criminal, any relevant evidence of rehabilitation or lack thereof, such as information about compliance with conditions of parole or probation, including orders of no contact with victims and witnesses, and the subject's conduct and experience since the time of the offense including, but not limited to, professional or educational certifications obtained
 - Any other relevant information, including information submitted by the subject.
 - Consider appeals of determinations of unsuitability based on claims of erroneous information received as part of the background check during the application process in accordance with 803 CMR 2.17: Requirement to Maintain a Secondary Dissemination Log and 2.18: Adverse Employment Decision Based on CORI or Other Types of Criminal History Information Received from a Source Other than the DCJIS
- Upon adverse determination, Many Rivers will provide the applicant a copy of their background screening report and a pre-adverse determination letter providing the applicant with a copy of their right to dispute the contents of the report, who to contact to do so and the opportunity to provide a supplemental statement
 - After ten (10) business days, if the applicant is not disputing the contents of the report and any provided statement does not alter the suitability determination, an adverse action letter will be issued providing the applicant information on the final determination along with any legal notices required

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- All suitability determinations will be documented in compliance with all requirements set forth in 935 CMR 500 et seq. and guidance provided by the Commission
- Background screening will be conducted by an investigative firm holding the National Association of Professional Background Screeners (NAPBS®) Background Screening Credentialing Council (BSCC) accreditation and capable of performing the searches required by the regulations and guidance provided by the Commission
- References provided by the candidate will be verified at the time of hire
- As deemed necessary, individuals in key positions with unique and sensitive access will undergo additional screening, which may include interviews with prior employers or colleagues
- As a condition of their continued employment, Marijuana Establishment Agents are required to renew their Marijuana Establishment Agent ID cards annually and submit to other background screening as may be required by the Company or the Commission

Personnel Records at a minimum include:

- Job descriptions for each agent, as well as an organization chart listing the positions
- A personnel record for each Marijuana Establishment Agent. Such records will be maintained for at least seven (7) years after termination of the agent's affiliation with Many Rivers and will include, at a minimum, the following:
 - All materials submitted to the Commission pursuant to 935 CMR 500.030(2)
 - All background check reports obtained in accordance with 935 CMR 500.030
 - Documentation of verification of references
 - The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters
 - Documentation of periodic performance evaluations
 - A record of any disciplinary action taken
 - Notice of completed Responsible Vendor Training and eight-hour related duty training
 - A staffing plan that will demonstrate adequate staff coverage
 - Personnel policies and procedures

Many Rivers' Record Keeping Procedures, section entitled Record Keeping Procedures includes Policies and Procedures for a plan describing how confidential information will be maintained.

Many Rivers' personnel policies and procedures, shall include, at a minimum, a Code of ethics; a whistle-blower policy; and a policy which notifies persons with disabilities of their rights under <https://www.mass.gov/service-details/about-employment-rights> or a comparable link, and includes provisions prohibiting discrimination and providing reasonable accommodations; 935 CMR 500.105(9)

Revised 1/9/23

DIVERSITY PLAN

I. PURPOSE & INTENT

Many Rivers LLC (“MANY RIVERS”) is committed to creating a diverse workforce that does not discriminate based on race, color, religion, gender, national origin, age, disability (or perceived disability), pregnancy, genetic information, gender identity, sexual orientation, military or veteran status, ancestry, marital or familial status, or citizenship. Furthermore, it is our belief that the more diverse and inclusive our team is the more successful MANY RIVERS will be in Massachusetts as we seek to utilize ideas and innovations from a variety of backgrounds, experiences and cultures

Plan Population is defined as:

- People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people;
- Women;
- Veterans;
- Persons with disabilities;
- LGBTQ+ individuals;
- CCC designated Certified Economic Empowerment Priority recipients; and
- CCC designated Social Equity Program participants.

MANY RIVERS’ Diversity Plan represents an initial approach to establish a comprehensive management plan with goals and measures for inclusion and diversity. The Diversity Plan will be evaluated and modified, when necessary, as our company grows.

II. PROPOSED INITIATIVES, GOALS and METRICS

GOAL1: Recruit and hire a diverse group of employees that values and promotes inclusiveness among the workforce.

Proposed Initiative: As part of its hiring plan, MANY RIVERS will seek to hire a workforce that is made up of:

20% Women

20% Minorities

20% Veterans

20% Persons with disabilities; and

20% People who identify as LGBTQ+

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With a goal to increase the number of individuals working in the establishment that meet the Plan Population defined above.

To achieve this goal, MANY RIVERS will:

- Create gender-neutral job descriptions;
- Post hiring needs in diverse publications and a variety of web-based communities, groups and recruitment platforms such as, but not limited to: Indeed; Leafwire; Ziprecruiter; Simplyhired, Monster and Glassdoor.
- Recruit from state and local employment staffing groups.
- Participate in local hiring events and job fairs, at least two annually, including events held by the Massachusetts Cannabis Business Association (MassCBA).

MANY RIVERS will adhere to the requirements set forth in 935 CMR 500.105(4) relative to the permitted and prohibited advertising, brand, marketing, and sponsorship practices of marijuana establishments. MANY RIVERS will engage with community groups and leaders to further identify ways in which to attract candidates that may not otherwise be aware of employment opportunities with MANY RIVERS. To ensure that our workplace is an inclusive environment and to promote equity among our team, all hiring managers will undergo training to address bias and cultural sensitivity.

Metrics and Evaluation: MANY RIVERS will assess the demographics of its employees to see if it is meeting its goal of increasing diversity in these positions. MANY RIVERS will twice annually analyze the staffing makeup and based upon the outcome of those analytics determine what steps are necessary to further increase the diversity of MANY RIVERS. MANY RIVERS will assess and review its progress within a year of receiving its Final License from the Cannabis Control Commission for a Delivery Operator marijuana establishment and then twice annually, thereafter. Based upon these twice annual reviews and in conjunction with the renewal of its license, MANY RIVERS will be able to demonstrate to the Commission the success of this initiative.

GOAL 2: Create a safe, accepting and respectful work environment

Proposed Initiative: To accomplish this goal, MANY RIVERS will require at least one annual cultural sensitivity training for all employees including specific training for employees in management positions.

Employees will be asked to fill out annual engagement surveys that will elicit feedback on MANY RIVERS work environment. Employees will be able to provide feedback to MANY RIVERS at any time through the use of an anonymous suggestion box outside management offices for any employee who wishes to leave a suggestion but remain anonymous when doing so. This box will remain locked, so any suggestions left inside cannot be tampered with.

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Metrics and Evaluation: MANY RIVERS will collect and consider the feedback from the surveys and suggestion box with a goal of having 100% of our employees describe MANY RIVERS as a safe, accepting, and respectful work environment. All comments and feedback will be documented and reviewed by senior management staff. MANY RIVERS will conduct engagement surveys annually and review the results of these surveys within a month of administering them. The suggestion box will be checked at least on a monthly basis by the Managing Partners or approved corresponding human resources management of the company. The senior management staff will identify any areas for improvement and, in collaboration with the MANY RIVERS employees, develop goals (short and long term) on how to address those areas of development. This review of feedback and engagement surveys will enable MANY RIVERS to demonstrate to the Commission the success of its progress upon the renewal of its license each year.

GOAL 3: Ensure that all participants in our supply chain and ancillary services are committed to the same goals of promoting equity and diversity in the adult-use marijuana industry.

Proposed Initiative: To accomplish this goal, MANY RIVERS will prioritize working with businesses in our supply chain and required ancillary services that are owned and/or managed by Plan Population (outlined in Section I.).

Metrics and Evaluation: MANY RIVERS will measure how many of its ancillary services and participants in its supply chain are owned and/or managed by Plan Populations and will calculate the percentage of services and members of its supply chain who meet this requirement. MANY RIVERS will ask suppliers and ancillary services if they would identify themselves as a business that is owned or managed by one of the Plan Populations and give supplier contractor priority to these businesses. In order to target a diverse supplier base, MANY RIVERS will post hiring needs in diverse publications and a variety of web-based recruitment platforms, attend community group meetings, at least annually, to introduce MANY RIVERS and address the existing hiring needs to attract a diverse array of suppliers.

MANY RIVERS will adhere to the requirements set forth in 935 CMR 500.105(4) relative to the permitted and prohibited advertising, brand, marketing, and sponsorship practices of marijuana establishments. During its engagement with community groups and leaders referenced in Goal 1, MANY RIVERS will further identify ways in which to attract diverse supply chain candidates that may not otherwise be aware of opportunities with MANY RIVERS. MANY RIVERS goal will be to work with at least 25% of businesses that identify as one of the Plan Populations throughout its supply chain and services. MANY RIVERS will assess these percentages annually and will be able to demonstrate to the Commission the success of its progress upon the renewal of its license each year.

III. ACKNOWLEDGMENTS:

Any actions taken, or programs instituted by MANY RIVERS will not violate the Commission's regulations.

a. The applicant acknowledges and is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4) and 935 CMR 501.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every ME and MTC, respectively; and

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

IV. CONCLUSION:

MANY RIVERS will conduct continuous and regular evaluations of the implementation of its goals and at any point will revise its policies and procedures in order to better accomplish the goals set out in this Diversity Plan.