



Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR281284
Original Issued Date: 01/19/2021
Issued Date: 01/19/2021
Expiration Date: 01/19/2022

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Patriot Care Corp

Phone Number: 978-771-1434
Email Address: bmayerson@col-care.com

Business Address 1: 21 Milk Street
Business City: Boston
Business State: MA
Business Zip Code: 02116
Business Address 2:
Mailing Address 1: 321 Billerica Road
Mailing City: Chelmsford
Mailing State: MA
Mailing Zip Code: 01824
Mailing Address 2:

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: RPA201838

RMD INFORMATION

Name of RMD: Patriot Care Corp
Department of Public Health RMD Registration Number: 265
Operational and Registration Status: Obtained Final Certificate of Registration and is 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: Robert Last Name: Mayerson 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: 14.72	Percentage Of Control: 14.72	
Role: Executive / Officer	Other Role:	
First Name: Nicholas	Last Name: Vita	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: 14.87	Percentage Of Control: 14.87	
Role: Executive / Officer	Other Role:	
First Name: Michael	Last Name: Abbott	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 4

Percentage Of Ownership:	Percentage Of Control:	
Role: Executive / Officer	Other Role:	
First Name: George	Last Name: Agganis	Suffix:
Gender: Male	User Defined Gender:	
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French), American Indian or Alaska Native		
Specify Race or Ethnicity:		

Person with Direct or Indirect Authority 5

Percentage Of Ownership:	Percentage Of Control:	
Role: Executive / Officer	Other Role:	
First Name: Mary-Alice	Last Name: Miller	Suffix:
Gender: Female	User Defined Gender:	
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)		
Specify Race or Ethnicity:		

Person with Direct or Indirect Authority 6

Percentage Of Ownership:	Percentage Of Control:	
Role: Executive / Officer	Other Role:	
First Name: David	Last Name: Hart	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 7

Percentage Of Ownership:	Percentage Of Control:	
Role: Executive / Officer	Other Role:	
Date generated: 03/25/2021		

First Name: Lars Last Name: Boesgaard 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: 100 Percentage of Ownership: 100
Entity Legal Name: Columbia Care LLC Entity DBA: DBA
City:
Entity Description: Delaware Limited Liability Company
Foreign Subsidiary Narrative:
Entity Phone: 978-771-1434 Entity Email: bmayerson@col-care.com Entity Website: www.col-care.com
Entity Address 1: 321 Billerica Road Entity Address 2:
Entity City: Chelmsford Entity State: MA Entity Zip Code: 01824
Entity Mailing Address 1: 321 Billerica Road Entity Mailing Address 2:
Entity Mailing City: Chelmsford Entity Mailing State: MA Entity Mailing Zip Code: 01824
Relationship Description: Columbia Care is one of the nation's largest and most experienced manufacturer and provider of medical marijuana products and services. Since first applying for licenses in Massachusetts in 2013 and being awarded 3 licenses, Columbia Care has provided all of the capital and know-how that has been required to build Patriot Care into the prime position that it enjoys today in the medical marijuana market in Massachusetts. Following the recent conversion of Patriot Care from a not-for-profit entity to a for-profit entity, Columbia Care LLC is the sole member of Patriot Care Corp and thus owns 100% of the equity and control. It exercises its authority through executives of Columbia Care that are also executives of Patriot Care. Four of these executives also comprise 100% of the Board of Patriot Care Corp. Columbia Care LLC's parent company is Columbia Care Inc.

Entity with Direct or Indirect Authority 2

Percentage of Control: 100 Percentage of Ownership: 100
Entity Legal Name: Columbia Care Inc. Entity DBA: DBA
City:
Entity Description: Corporation
Foreign Subsidiary Narrative: Columbia Care Inc is a registered public entity in British Columbia Canada and publicly lists on the Canadian exchange
Entity Phone: 212-634-7100 Entity Email: info@col-care.com Entity Website: www.col-care.com
Entity Address 1: 680 Fifth Ave., 24th Floor Entity Address 2:
Entity City: New York Entity State: NY Entity Zip Code: 10019
Entity Mailing Address 1: 680 Fifth Ave., 24th Floor Entity Mailing Address 2:
Entity Mailing City: New York Entity Mailing State: NY Entity Mailing Zip Code: 10019
Relationship Description: Columbia Care Inc is a publicly traded for profit corporation and the parent and 100% owner of Columbia Care LLC.

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

Entity Contributing Capital 1

Entity Legal Name: Patriot Care Corp

Entity DBA: Patriot Care

Email: bmayerson@col-care.com Phone: 978-771-1434

Address 1: 321 Billerica Road

Address 2:

City: Chelmsford

State: MA

Zip Code: 01824

Types of Capital: Monetary/Equity,
Other

Other Type of Capital: Cash from
operations

Total Value of Capital Provided:
\$950000

Percentage of Initial
Capital: 100

Capital Attestation: Yes

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 21 Milk Street

Establishment Address 2:

Establishment City: Boston

Establishment Zip Code: 02109

Approximate square footage of the establishment: 6200

How many abutters does this property have?: 307

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	CommunityOutreach_BostonDisp.pdf	pdf	5f6511b17e8b3807d9e5d45c	09/18/2020
Plan to Remain Compliant with Local Zoning	Local Zoning Compliance_21 Milk Street_9_20_20.pdf	pdf	5f6809c3ac4d5e07c7f9b88d	09/20/2020
Certification of Host Community Agreement	PCC_Boston_HostCert_Signed.pdf	pdf	5f734607f3e55207cefa3cf1	09/29/2020

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	PlanForPositiveImpact_Boston_10_16_20.pdf	pdf	5f8a4bfdcdad0b38f56c0ac4	10/16/2020

ADDITIONAL INFORMATION NOTIFICATION

Notification: I understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Executive / Officer **Other Role:**
First Name: Robert **Last Name:** Mayerson **Suffix:**
RMD Association: RMD Manager
Background Question: yes

Individual Background Information 2

Role: Executive / Officer **Other Role:**
First Name: Nicholas **Last Name:** Vita **Suffix:**
RMD Association: RMD Manager
Background Question: yes

Individual Background Information 3

Role: Executive / Officer **Other Role:**
First Name: Michael **Last Name:** Abbott **Suffix:**
RMD Association: RMD Manager
Background Question: no

Individual Background Information 4

Role: Executive / Officer **Other Role:**
First Name: David **Last Name:** Hart **Suffix:**
RMD Association: RMD Manager
Background Question: no

Individual Background Information 5

Role: Executive / Officer **Other Role:**
First Name: Mary-Alice **Last Name:** Miller **Suffix:**
RMD Association: RMD Manager
Background Question: no

Individual Background Information 6

Role: Executive / Officer **Other Role:**
First Name: George **Last Name:** Agganis **Suffix:**
RMD Association: RMD Manager
Background Question: no

Individual Background Information 7

Role: Executive / Officer **Other Role:**
First Name: Lars **Last Name:** Boesgaard **Suffix:**
RMD Association: RMD Manager
Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

Entity Background Check Information 1

Role: Parent Company **Other Role:**
Entity Legal Name: Columbia Care LLC **Entity DBA:**
Entity Description: Delaware Limited Liability Company
Phone: 978-771-1434 **Email:** bmayerson@col-care.com

Primary Business Address 1: 321 Billerica Road Primary Business Address 2:

Primary Business City: Chelmsford Primary Business State: MA Principal Business Zip Code: 01824

Additional Information: Columbia Care LLC owns 100% of Patriot Care Corp.

Entity Background Check Information 2

Role: Parent Company Other Role:

Entity Legal Name: Columbia Care Inc Entity DBA:

Entity Description: Corporation

Phone: 212-634-7100 Email: info@col-care.com

Primary Business Address 1: 680 Fifth Avenue Primary Business Address 2: 24th Floor

Primary Business City: New York Primary Business State: NY Principal Business Zip Code: 10019

Additional Information: Columbia Care Inc is a publicly traded company and the 100% owner of Columbia Care LLC

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	FILED Articles of Entity Conversion - 4_12_18.pdf	pdf	5ad906cefe11f335e6a96c97	04/19/2018
Bylaws	Patriot Care Post Conversion By-Laws.pdf	pdf	5ad906dc7212167e7aead968	04/19/2018
Department of Revenue - Certificate of Good standing	MA DOR - Certificate of Good Standing PC 08.18.20.pdf	pdf	5f640b87d4713f079b922c5e	09/17/2020
Secretary of Commonwealth - Certificate of Good Standing	MA SOC Cert of good standing_8_14_20.pdf	pdf	5f640b99be635707e886aa14	09/17/2020
Department of Revenue - Certificate of Good standing	PC MA DUA Certificate of Compliance 9.18.2020.pdf	pdf	5f64fe2e8012da07a0d91f18	09/18/2020

No documents uploaded

Massachusetts Business Identification Number: 463348302

Doing-Business-As Name: Patriot Care Corp

DBA Registration City: Boston

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	Milk St COI_2020.pdf	pdf	5f640f697e8b3807d9e5d134	09/17/2020
Business Plan	Business Plan Summary_Boston_Combined_9_28_20.pdf	pdf	5f7202d45f18f707b2bf0eb5	09/28/2020
Proposed Timeline	Timeline_BostonDisp_10_04_20.pdf	pdf	5f7b2130e4c06f07e61d2d06	10/05/2020

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for obtaining marijuana or marijuana products	PCCBoston_PlanForObtainingMarijuana.pdf	pdf	5ed594502f29a23e61da2826	06/01/2020
Restricting Access to age 21 and older	PCCBoston_RestrictingAccesssto21orOlder.pdf	pdf	5ed5948a2f29a23e61da282a	06/01/2020
Prevention of diversion	PCCBoston_PreventionofDiversion.pdf	pdf	5ed594aa7e5a433e27f32a27	06/01/2020
Transportation of marijuana	PCCBoston_Transport.pdf	pdf	5ed594dd4e781a4a7c39de93	06/01/2020
Inventory procedures	PCCBoston_InventoryProcedures.pdf	pdf	5ed594f8ce4d494a83756947	06/01/2020
Maintaining of financial records	PCCBoston_MaintainingFinancialRecords.pdf	pdf	5ed5955c565a543e2e6e2f8e	06/01/2020
Energy Compliance Plan	EnergyCompliancePlan_21 Milk Street.pdf	pdf	5f6c96ce8012da07a0d92e9d	09/24/2020
Security plan	PCCBoston_SecurityPlan_10_4.pdf	pdf	5f79c4eaf3e55207cefa4bbf	10/04/2020
Storage of marijuana	PCCBoston_Storage of Marijuana_10_5_20.pdf	pdf	5f7b9cb08109e507db0411aa	10/05/2020
Record Keeping procedures	PCCBoston_Record Keeping Procedures_10_5_20.pdf	pdf	5f7b9cfad4713f079b92612e	10/05/2020
Dispensing procedures	PCCBoston_Dispensing Procedures_10_5_20.pdf	pdf	5f7b9d275f18f707b2bf2679	10/05/2020
Separating recreational from medical operations, if applicable	PCCBoston_Separating Rec and Med_10_5_20.pdf	pdf	5f7ba0069bb9f30799289c63	10/05/2020
Qualifications and training	PCCBoston_Qualifications and Training_10_5_20.pdf	pdf	5f7ba0308012da07a0d9518c	10/05/2020
Quality control and testing	PCCBoston_Quality Control and Testing_10_5_20.pdf	pdf	5f7ba2f57e8b3807d9e60612	10/05/2020
Personnel policies including background checks	PCCBoston_Personnel Policies_10_5_20.pdf	pdf	5f7ba3119193d007a21963da	10/05/2020
Diversity plan	PCCBoston_DiversityPlan_10_13_20.pdf	pdf	5f8a4c33a0fb0939041fc6ca	10/16/2020

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:

COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

Monday From: 9:00 AM	Monday To: 7:00 PM
Tuesday From: 9:00 AM	Tuesday To: 7:00 PM
Wednesday From: 9:00 AM	Wednesday To: 7:00 PM
Thursday From: 9:00 AM	Thursday To: 7:00 PM
Friday From: 9:00 AM	Friday To: 7:00 PM
Saturday From: 9:00 AM	Saturday To: 7:00 PM
Sunday From: 9:00 AM	Sunday To: 7:00 PM



Community Outreach Attestation

We followed all of the recommended and required guidance from the Mayor's office as they insisted on driving the process (see Exhibit B).

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): Sept 4, 2019
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: Aug 23 2019
- b. Name of publication: Bozwan Herald

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: August 8, 2019

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: August 22, 2019

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



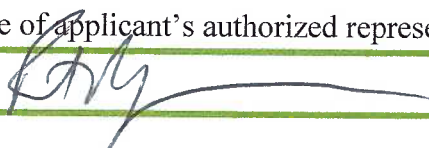
Name of applicant:

PATNOT CARE CORP

Name of applicant's authorized representative:

Robert Mayerson

Signature of applicant's authorized representative:



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LEGAL NOTICES LEGAL NOTICES LEGAL NOTICES

NOTICE OF MORTGAGEE'S SALE OF REAL ESTATE

to the execution of the Power of Sale contained in a certain deed, by virtue of which said deed, William Hodge to Mortgage Electronic Registration Systems, Inc., as nominee for America's Wholesale Lender Administration Systems, Inc., as nominee for America's Wholesale Lender Administration Systems, Inc., recorded in the Suffolk County Registry of Deeds in Book 41163, Page 228, of which mortgage the undersigned Reg- is the present holder, by assignment from: Mortgage Electronic Reg- istration Systems, Inc., Solely as Nominee for America's Wholesale Lender to The Bank of New York Mellon fka The Bank of New York, Trustee for the Certificateholders, CWABS, INC., ASSET BACKED CER- TIFICATES, Series 2007-2, recorded on August 17, 2010, in Book No. 00446786, at Page 116 for breach of the conditions of said mortgage and for the purpose of foreclosing, the same will be sold at Public Auc- tion at 12:00 PM on September 20, 2019, on the foregoing premises located at 77 Ironquois Street, Roxbury (Boston), Suffolk County, Mas- sachusetts; all and singular the premises described in said mortgage, including parcels of land owned, occupied and possessed within the City of Boston, bounded and described as follows: Lot 1 About twenty one hundred eighty five (2685) square feet of land on the northeast- erly side of Ironquois Street, making the easterly corner of Darling Street adjoining an estate now or formerly of Catherine McDevitt, being lot thirty three (33) W.C. Bates plan, dated March 15, 1915, recorded with Sul- folk County Deeds, at the end of Book 41444, Said land is situated in Block 214 D2 A in the Roxbury District shown on the Boston Assessors' Plans 2007-2 A in the Office of the Board of Assessors, Lot 2 About twenty seven hundred thirty five (2735) square feet of land on the southwesterly side of Sachem Street, making the southerly corner of Darling Street, adjoining an estate now or formerly of Catherine McDevitt, being lot twenty nine (29) W.C. Bates plan, dated March 15, 1915, recorded with Suffolk Deeds at end of Book 41444, Said land is situated in Block 214 D2 A in the Roxbury District shown on the Boston Assessors' Plans 2007-2 A in the Office of the Board of Assessors, Lots 3 and 4 in Block 41163, filed as said deed recorded with Suffolk County Registry of Deeds in Book 41163, Page 226. These premises will be sold and conveyed subject to and with the benefit of all rights, interests, claims, liens, mortgages, easements, covenants, liens or claims of whatever nature, improvements, public assessments, any and all unpaid taxes, tax titles, tax liens, water and sewer liens and any other municipal assessments or liens or existing encumbrances of record which are in force and are applicable, having priority over said mort- gage, whether or not reference to such restrictions, easements, im- provements, liens or encumbrances is made in the deed. TERMS OF SALE: A deposit of Twenty Thousand (\$20,000.00) Dollars by certifi- cate of bank check will be required to be paid by the purchaser at the time and place of sale. The balance is to be paid by certified or bank check at Harmon Law Offices, P.C., 150 California St., Newton, Mas- sachusetts 02459, or by mail to P.O. Box 63389, Newton Highlands, Massachusetts 02460-0389, within thirty (30) days after the date of sale. Deed with charge price. The description of the premises contained in said mortgage shall control in the event of an error in this publica- tion. Other terms if any, to be announced at the sale. THE BANK OF NEW YORK MELLON FKA THE BANK OF NEW YORK AS TRUSTEE FOR THE CERTIFICATEHOLDERS OF CWABS INC., ASSET-BACKED CERTI- FICATES, SERIES 2007-2 Present holder of said mortgage By its At- torneys, HARMON LAW OFFICES, P.C. 150 California St., Newton, MA 02459 (617) 558-0500 0140070579

Aug 23. 30 Sept 6

LEGAL NOTICES

COMMONWEALTH OF MASSACHUSETTS

TO: ORDER OF NOTICE
DEPARTMENT OF THE TRIAL COURT
19 SM 003574

re:

Konstantinos Patsouras; Eleni Vidalis
And to all persons entitled to the benefit of the Servicemembers Civil
Relief Act: 50 U.S.C. App. § 3901 (et seq.).

City of Boston Credit Union

If you now are, or recently have been, in the active military service of the United States or Armed Services Civil Relief Act, you are entitled to the non-disclosure of the above-mentioned property on that basis; then you or your attorney must file a written appearance and answer in this court at Three Pemberton Square, Boston, MA 02108 on or before September 23, 2019 or you may lose the opportunity to challenge the foreclosure on the grounds of noncompliance with the Act.

Witness, GORDON H. PIPER, Chief Justice of said Court on August 9, 2019

Attest: Deborah J. Patterson, Recorder

LEGAL NOTICES

LEGAL NOTICES

Notice is hereby given by Always Open Towing in pursuant of M.G.L. c.225 s.39-a that on September 7th, 2019 at 9:00 am at 18 Talbot Avenue Dorchester, Ma 02124 the following vehicles: 2009 Acura TSX vin #JH4CUJ266X9C012194 last registered owner Terance Eady and a 2011 Ford Escape vin #1FMCU9D62BK94451 last registered owner Carlos Sotocuecto will be sold at a public auction.

Aug 23. 30. Sept 6

LEGAL NOTICES

LEGAL NOTICES

Notice of Public Meeting

Notice is hereby given that a Community Outreach Meeting for a Proposed Marijuana Establishment is scheduled for:

Date: Wednesday, September 4th
Time: 6:00 PM

The Proposed Marijuana Establishment is anticipated to be located at:

21 Milk St., Boston, MA 02109
There will be an opportunity for the public to ask questions

If you have any questions about this meeting or have comments about the proposal

Yissel Guerrero
Mayor's Office of Neighborhood Services
Yissel.Guerrero@boston.gov

Please note, the city does not represent the owner(s)/developer(s)/attorney(s). The purpose of this meeting is to get community input and listen to the residents' positions on this proposal. This flyer has been dropped off by the proponents per the city's request

Aug 23

Architects and engineers
are advised that DSB
List #19-25 through DSB
List #19-28 dated
August 21, 2019
describing 04 Designer
Selection Board project(s)
is now available
at www.mass.gov/dsb

For convenient home delivery of the Boston Herald, call (800) 882-1211.

From: ddelaney@delanepolicygroup.com

Subject: Fwd: 21 Milk Street

Date: August 8, 2019 at 1:46 PM

To: Bob Mayerson bmayerson@col-care.com, Dennis Kunian dennis_kunian@yahoo.com, Lawrence DiCara ldicara@outlook.com

DD

Caution: This email originated from an external source.

FYI.

Thanks for the assist, Larry.

Daniel J. Delaney
(617) 251-6774

Attachment B

Mayor's office indicated verbally
that they would handle filing with
city clerk

From: Edward McGuire <edward.mcguire@boston.gov>

Sent: Thursday, August 8, 2019 12:36:41 PM

To: ddelaney@delanepolicygroup.com <ddelaney@delanepolicygroup.com>

Subject: 21 Milk Street

Attached you will find an Abutter's Meeting Flyer, as well as a list of Abutter's. You will need to complete a few things for the community process:

1. Flyer the abutting residents 7-10 days in advance of the Community Meeting.
2. Post a newspaper ad in the local newspaper at least 7 days in advance
3. Certify mail the flyer to all of the abutter's mailing addresses.

After that, our office will need receipts of the Newspaper Ad, the Certified Mailer, the Zoning Refusal/ISD Appeal, and an email from the applicant confirming that they have flyered.

I have been advised that Herald advertisement should be sufficient for notice. That there is not one local paper for that area.

If you have any questions about this at all, please do not hesitate to reach out. Thank you,

Ed



Edward M McGuire III
Chief of Staff
Mayor Martin J. Walsh
Mayor's Civic Engagement Cabinet
[617.635.2682](tel:617.635.2682) (w)



Abutter's
Meeting...et.docx



mailingList 21
Milk Street.csv



Attachment C
part 1

Notice of Public Meeting

Notice is hereby given that a Community Outreach Meeting for a Proposed Marijuana Establishment is scheduled for:

Date: Wednesday, September 4th
Time: 6:00 PM
Location: "MCLE New England"
10 Winter Pl, # 4751, Boston, MA 02108

The Proposed Recreational Marijuana Establishment is anticipated to be located at:

21 Milk St., Boston, MA 02109

There will be an opportunity for the public to ask questions.

If you have any questions about this meeting or have comments about the proposal please contact:

Edward McGuire
Mayor's Office of Neighborhood Services
Edward.McGuire@boston.gov
617-635-2682

Please note, the city does not represent the owner(s)/developer(s)/attorney(s). The purpose of this meeting is to get community input and listen to the residents' positions on this proposal. This flyer has been dropped off by the proponents per the city's request.



QUICKBOOKS

OTHER
SERVICES



APPS ▼

TEAM

NEW!

PROFILE ▼

Attachment C
part 2
In a hurry?

You sent 309 pages to
309 recipients for
\$3,176.52

Next
time,
send
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POSTAGE
SUMMARY

August 22, 2019

Document
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ORDER
SUMMARY

SENT TO:

Abutter's
Meeting
Notice_Flyer- 21
Milk Street.pdf
Tracking
Information

[REDACTED]
[REDACTED]
[REDACTED]

CERTIFIED

92147901324734000933836882

Abutter's

[REDACTED]



Attachment C
part 3

August 28, 2019

Mr. Edward McGuire
Mayor's Office of Neighborhood Services
City of Boston
1 City Hall Square
Boston, MA 02201

In addition to mailing to all
legal abutters (owners) we
hand delivered the notice to
63 renters/businesses within
300' of the location.

Dear Edward

I, Robert Mayerson, do hereby attest that on August 26 and 27, I hand delivered flyers (sample attached) concerning the public meeting on September 4 to all of those residences, office, retail and food and beverage establishments on the attached list. If there was a security person at the front door or lobby, which was often the case, I asked that the flyer be delivered to the building manager so that he or she could share with those living or working in the building.

Please let me know if you have any questions.

Sincerely

A handwritten signature in black ink, appearing to be "RM", with a long, sweeping horizontal line extending to the right.

Robert Mayerson
978-771-1434
bmayerson@col-care.com



Local Zoning Compliance – 21 Milk Street

The Patriot Care retail Medical Marijuana Treatment Center (MTC) located at 21 Milk Street, Boston MA has been operational since August 2016. From a zoning perspective, the facility currently operates as a state-licensed MTC dispensary under a conditional use permit issued by the City of Boston in 2015 specific to its current medical use. The Company has been in compliance with all zoning regulations since that time. As required by the City of Boston, Patriot Care has applied for a separate conditional use permit with the Boston Zoning Board of Appeals (ZBA) that is specific to adult-use retail sales.

The City's approval process is comprised of multiple steps including, but not limited to, the following:

- File application with the City for a license from the City to operate, subject to State approval **(completed May 2019)**
- File an application for a building permit from Boston Inspectional Services which is automatically denied (City's process) and then file an appeal to be heard by the Boston ZBA **(completed July 2019)**
- Hold community meeting **(completed September 2019)**
- Receive approval from Boston Cannabis Board and receive host agreement **(completed September 2020)**
- Schedule and attend hearing and receive approval for conditional use permit from the Boston ZBA **(pending)**

Once the final approval for a conditional use permit is granted from the Boston ZBA, Patriot Care will have all the necessary from the City to co-locate a retail adult-use Marijuana Establishment with its existing MTC at 21 Milk Street. The Company will ensure that it will remain in compliance with any conditions placed on the conditional use permit by the ZBA.

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:

Patriot Care Corp

2. Name of applicant’s authorized representative:

Robert Mayerson

3. Signature of applicant’s authorized representative:



4. Name of municipality:

City of Boston

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

Robert Arcangeli



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).*):

robert.arcangeli@boston.gov

8. Host community agreement execution date:

September 29, 2020





Plan for Positive Impact - Addendum

Following the RFI requests from the Cannabis Control Commission to add a statement that our Plan for Positive Impact will adhere to the requirements set forth in 935 CMR 500105(4), the full statement has been added and can be found at the bottom of page 5 of this document.

Furthermore, the Commission requested letters from the organizations in our Plan for Positive Impact that we intend to donate time, goods, services or monies to. These letters are all attached at the end of this document.



Plan for Positive Impact

Goals and Objectives

Patriot Care commits to specific targets and metrics for each of the elements listed below and will report back to the CCC on our progress on an annual basis. We understand that specificity and self-assessment are critical to meaningful, sustained progress.

Since first applying for a medical marijuana dispensary license in 2014, Patriot Care has striven to be a corporate citizen that reflects Boston and is responsive to the desires of the community and we are proud of our many accomplishments. However, 2020 demands that we redouble our efforts, both inside and outside of the cannabis space, to reflect and be responsive to the community in which we are fortunate to operate. These are the key elements of our plan:

#1: Pro-actively market to, engage, and train returning citizens for opportunities at Patriot Care and across the cannabis industry.

Goals and Metrics:

- Establish and roll out the Patriot Care *New Leaf Program*. The New Leaf Program seeks out returning citizens and community partners to engage potential employees where they are.
 - *Metric:* Patriot Care seeks to actively engage 250 returning citizens to educate them and connect them with opportunities within the cannabis industry in the first year.
- Actively support and engage with community-based organizations around expungement, CORI sealing and CORI reform activities.
 - *Metric:* Patriot Care seeks to participate in quarterly expungement/CORI sealing workshops and clinics.
- Develop and support educational programs designed for formerly incarcerated individuals.
 - *Metric:* Patriot Care commits to working in conjunction with its parent company, Columbia Care, to have at least 3 virtual education events to help overcome barriers to entering the cannabis industry.

Programs:

- Patriot Care is currently working with the Middlesex County Sheriff's Office and has engaged the Suffolk County Sheriff's office on materials and



programs to inform soon-to-be returning citizens of potential opportunities in the cannabis industry

- Collaborate with the Union of Minority Neighborhoods (UMN) to organize and coordinate CORI sealing and expungement programs. Patriot Care has a long-standing relationship with UMN, dating back to 2014.
- Coordinate with the Boston Office of Returning Citizens to ensure that our efforts are connected with best practices and conditions on the ground in Boston.
- Build on our existing relationship with All of Us or None (<https://prisonerswithchildren.org/about-aouon/>), a group founded and run by formerly incarcerated individuals, to present nationally available, virtual education to overcome barriers to entering the cannabis industry. This programming will continue to:
 - Inform individuals about the types of job roles and “day in the life” in the cannabis industry
 - Provide insight on writing a competitive resume
 - Advice for successful interviews and onboarding

#2: Partner and collaborate with community-based initiatives to enhance civic and economic empowerment in communities disproportionately impacted by the war on drugs

Because both the War on Drugs and the legalization of the cannabis industry are products of ever-evolving political, cultural and social dynamics, we feel that it's crucial to support organizations that empower impacted communities to successfully advocate for social, political and cultural changes that affect their lives and livelihoods.

Goals and Metrics:

- Patriot Care will seek active partnerships with local organizations in the Dorchester and Roxbury neighborhoods that fall within the CCC's designated census tract areas to do our part to support communities enhancing and expanding their own capacities to direct their social and economic enhancement.
 - *Metric:* Become an active participant and/or sponsor for at least four events per year with these organizations
- Sponsor scholarships and provide technology solutions for Bostonians who are either at-risk or come from disproportionately impacted communities (not necessarily cannabis related)
 - *Metric:* Donate 10 Chromebooks and grant at least \$2,500 in scholarships per year to at-risk populations
- Support local cultural events which highlight the richness, complexity and challenges of Boston's multiracial history.



- *Metric:* Provide financial support for at least one cultural event per year
- Support efforts to veterans and immigrant communities that have borne the brunt of the impact of a criminal justice response rather than a public health response to the substance abuse epidemic in Massachusetts.
 - *Metric:* Provide financial and/or in-kind support to at least two Boston-based organizations helping veterans and immigrants.

Programs:

- Building upon years of support, Patriot Care is collaborating with Project Hope to provide technology (Chromebooks) and adult-learning scholarship opportunities and co-sponsor job fairs. Project Hope is a multi-service agency at the forefront of efforts in Boston to move families up and out of poverty. They provide low-income women with children access to education, jobs, housing and emergency services.
- Reach out to veterans' groups (minority and otherwise) to identify and address unmet needs.
- Collaborate with RIAN Immigrant Center (formerly Irish International Immigrant Center) efforts to provide direct legal and wellness (e.g. housing, jobs) assistance to immigrants in Boston (over 2,000 families, predominantly people of color) and MA more broadly. Patriot Care's support to Rian has been long-standing and is comprised of direct monetary contributions as well as Bob Mayerson playing a leadership role on Rian's Advisory Board, Program Committee and Host Committee for its annual Solas Awards fundraiser.
- Support Revolutionary Spaces in the production of their upcoming play about Crispus Attucks. Revolutionary Spaces recently announced its digital companion to Reflecting Attucks, a new exhibition now open at Boston's Old State House. Unfolding over the course of several months, Reflecting Attucks will provide a ground-breaking look at Crispus Attucks at a critical moment, as our nation grapples with the vital role that protest and resistance play in American democracy and with the historical roots of inequality, particularly for Black and Indigenous communities.

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

Patriot Care
Bob Mayerson
21 Milk Street
Boston, MA 02109

October 13, 2020

Dear Bob,

Project Hope is grateful to Patriot Care gift of \$5000 in support of our Workforce and Adult Education program in service to the community.

Since 1981, Project Hope has been at the forefront of efforts to move Boston's most vulnerable families up and out of poverty. Our Family Shelter on Magnolia Street in North Dorchester has been home to hundreds of women and children for nearly 40 years. A few blocks away on Dudley Street in Roxbury sits our Community Building, where we offer job training and employment placement services, adult education, English language instruction, as well as housing services to the community.

Over the last year, Project Hope's leadership, staff and Board have engaged in deep reflection around our mission and purpose here. We are poised for growth and have committed to living out that growth by deepening our roots and impact within this very neighborhood. The growth we seek leads to systems level impact for this community. It happens in partnership with local leaders, other service agencies and community members. We are thankful to Patriot Care for ensuring Project Hope remains at the forefront of improving outcomes in partnership with local families.

Sincerely,



Christine Dixon
Executive Director

*Project Hope did not provide any goods or services in exchange for this donation.
Please keep this letter as an acknowledgement of your donation.*



Mr. Robert Mayerson
Patriot Care
21 Milk Street
Boston, Massachusetts 02109

October 13, 2020

Dear Bob,

From all of us at the Rian Immigrant Center (formerly known as the Irish International Immigrant Center), I want to thank you and Patriot Care for your generous gift of \$5,000 in support of the 2020 Solas Awards, which we received on 10/05/2020. I am honored and deeply grateful that you have chosen to support our work with immigrants from Ireland and around the world, during this difficult and uncertain time.

Your gift will make a difference in the lives of families from 126 countries who are building new lives in the United States. Together, we are providing vital services that bring stability, comfort, new opportunities, and hope, including:

- Immigration legal services that make it possible for low-income immigrants and refugees to gain legal status, work authorization, and be reunited with their family members.
- Education services that empower immigrants with the skills, education, and confidence they need to earn a sustainable living, to contribute to economic development, and to integrate into society.
- Wellness services that provide compassionate, confidential care and support for emotional and mental health concerns including depression and anxiety, substance use disorders and recovery, and crisis management.
- Learning exchange programs that support Irish students and recent graduates who are interning in the US and provide experience to enhance their future career and academic pursuits

Day in and day out, these services are making a meaningful difference in the lives of the families we support. I encourage you to visit www.riancenter.org/what/stories to learn more about the people impacted by your generosity.

Thank you again, Bob, for your thoughtful support and for standing in solidarity with immigrants and refugees. Your generosity will help alleviate the hardship faced by our most vulnerable clients. We are deeply grateful for your support.

With sincere gratitude,

Ronnie Millar, Executive Director

GIFT RECEIPT: Gift Date: 10/05/2020 Gift Amount: \$5000

Goods and Services Received: N/A

RIAN IMMIGRANT CENTER

ONE STATE STREET, 8TH FLOOR, BOSTON, MA 02109

www.riancenter.org | 617-542-7654

The Rian Immigrant Center is a tax-exempt 501(c)3 non-profit organization, EIN# 04-306-3382. Your contribution is tax-deductible to the furthest extent of the law



Union of Minority Neighborhoods

42 Seaverns Ave. Boston, MA 02130 617-942-7577
umnunity@gmail.com www.umnunity.org

Union Station,
2 Washington Square,
Worcester, MA 01604

October 15, 2020

Dear Chairman Hoffman, Commissioner Flanagan, Commissioner Doyle, and Commissioner McBride,

The Union of Minority Neighborhoods has been contacted by Patriot Care about collaborating on their positive impact plan. The Union of Minority Neighborhoods is willing to accept donations of time, goods, services and/or monies from Patriot Care.

Sincerely,

Matthew Parker
Director of Organizing

Board of Directors:	Daina Estime, Chair	Joe Leavey, Treasurer	Tracy Miller, Clerk
Glenn Asch	Michael J. Brown	Dan Delaney	Jonathan Regis
			Horace Small, Executive Director



info@revolutionaryspaces.org
TEL 617.720.1713

310 Washington Street
Boston, MA 02108

RevolutionarySpaces.org

October 14, 2020

Boston Zoning Board of Appeals
Boston City Hall
Boston, MA 02108

RE: Patriot Care Recreational Cannabis Retail License

Dear Members of the Boston Zoning Board of Appeals,

I write to express Revolutionary Spaces' enthusiastic support for Patriot Care's application for a license to operate a recreational, adult-use cannabis dispensary at their Milk Street location in Boston.

Revolutionary Spaces owns and manages the Old South Meeting House located across Milk Street from Patriot Care. We can attest that Patriot Care has not only been a good neighbor and valuable member of the downtown business community, but they have also been supportive of other businesses in the neighborhood. Their medical dispensary operations have been safe, responsibly run, and an asset to the neighborhood.

Part of being a good neighbor involves being active in our neighborhood. Patriot Care has supported our efforts to bring greater awareness to programming at the Old South Meeting House, including our ongoing focus on civic engagement and Boston's rich history of protest and free speech. One such important program is our *Reflecting Attacks* exhibit at the Old State House and its digital programming extension. Patriot Care's support allows us to further our goal of bringing Boston's diverse history to a larger audience.

As the city continues the process for approving applicants for recreational dispensaries, we believe it is important to consider how a proposed business will integrate into the existing neighborhood's citizens and businesses. Patriot Care has already shown their commitment to, and experience with, our neighborhood.

We strongly support their application to co-locate a recreational dispensary at their current Milk Street medical dispensary location.

Sincerely,

Nathaniel Sheidley, Ph.D.
President and Chief Executive Officer



AOUON CENTRAL ILLINOIS

ALL OF US OR NONE

General Parker
All of Us or None Central Illinois
411 Hamilton Ste. 1800
Peoria, IL 61602

October 14, 2020

Boston Cannabis Board
1 City Hall Square
Boston, MA 02201

To Whom It May Concern:

I am the Executive Director of All of Us or None Central Illinois. Since 2019, I've worked with Columbia Care for a 2020 partnership to educate and inform previously incarcerated individuals about how to enter the cannabis industry.

We have hosted three nationally available and advertised webinars this year with additional webinars to come this fall. Topics have covered entrepreneurship, ancillary businesses, and how to submit a competitive application to work in a dispensary or cultivation facility. We are also working with those interested, how to negotiate contracts so they won't be taken advantage of and left out in the cold with no assets and be taken advantage of.

I look forward to continuing to work with Ms. Abebe and the Columbia Care team on our joint programming.

Regards,

General Parker
Executive Director,
All of Us or None Central Illinois
411 Hamilton Blvd., Ste. 1800
Peoria, IL 61602
(309) 232-8583
(309) 713-6025 cell
centralillinoisauon@gmail.com

www.allofusornone.org

411 Hamilton Blvd. , Suite 1800
Peoria, IL 61702
309.232.8583
centralillinoisauon@gmail.com

Mail address:
P.O. Box 3026
Peoria, IL 61602-3026
www.allofusornon.org

From: **Bob Mayerson** bmayerson@col-care.com
Subject: Middlesex Sheriff
Date: October 16, 2020 at 9:29 PM
To: Bob Mayerson bmayerson74@gmail.com



From: Cook, Bridget (SDM) <bridget.cook@state.ma.us>
Sent: Friday, October 16, 2020 8:42:28 PM
To: ddelaney@delanepolicygroup.com <ddelaney@delanepolicygroup.com>
Subject:

Hello Mr. Delaney,

Thank you for reaching out to Sheriff Koutoujian. Middlesex Sheriff's Office is open to discussions about providing information to returning citizens about potential opportunities in the regulated cannabis industry. We look forward to further communication on this.

Thank you,
Bridget

*Bridget Cook
Chief of Staff
Middlesex Sheriff's Office
Sheriff Peter J. Koutoujian
400 Mystic Avenue
Medford, MA 02155
781-960-2842*

Bob Mayerson | Columbia Care LLC | 978-771-1434

D

The Commonwealth of Massachusetts

William Francis Galvin

Secretary of the Commonwealth

One Ashburton Place, Boston, Massachusetts 02108-1512

FORM MUST BE TYPED

**Articles of Entity Conversion of a
Domestic Non-Profit with a Pending Provisional
or Final Certification to Dispense Medical Use Marijuana
to a Domestic Business Corporation**
(General Laws Chapter 156D, Section 9.53; 950 CMR 113.30)

FORM

Patriot Care Corp. is a Medical
Marijuana Treatment Center with the
Department of Public Health in accordance
with 105 CMR 725.004 as of April 10, 2018.

Bryan Harter
Bryan Harter
Director

Medical Use of Marijuana Program
Bureau of Healthcare Safety and Quality
Massachusetts Department of Public Health

- (1) Exact name of the non-profit: Patriot Care Corp.
- (2) A corporate name that satisfies the requirements of G.L. Chapter 156D, Section 4.01:
Patriot Care Corp.
- (3) The plan of entity conversion was duly approved in accordance with the law.
- (4) The following information is required to be included in the articles of organization pursuant to G.L. Chapter 156D, Section 2.02(a) or permitted to be included in the articles pursuant to G.L. Chapter 156D, Section 2.02(b):

ARTICLE I

The exact name of the corporation upon conversion is:

Patriot Care Corp.

ARTICLE II

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

ARTICLE III

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

WITHOUT PAR VALUE		WITH PAR VALUE		
TYPE	NUMBER OF SHARES	TYPE	NUMBER OF SHARES	PAR VALUE
		Common	100	0.001

ARTICLE IV

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

The Common Stock shall have the sole and exclusive power to vote on any matter submitted to the stockholders of the Corporation.

ARTICLE V

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

None

ARTICLE VI

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

See Attachment Sheet VI

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

ARTICLE VII

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

ARTICLE VIII

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

- a. The street address of the initial registered office of the corporation in the commonwealth:
70 Industrial Avenue East, Lowell, MA 01852
- b. The name of its initial registered agent at its registered office:
Mary-Alice Miller
- c. The names and addresses of the individuals who will serve as the initial directors, president, treasurer and secretary of the corporation (an address need not be specified if the business address of the officer or director is the same as the principal office location):

President: **Nicholas Vita**

Treasurer: **Jill Enders**

Secretary: **Mary-Alice Miller**

Director(s): **Nicholas Vita, Michael Abbott, David Hart, Robert Mayerson**

- d. The fiscal year end of the corporation:
12/31
- e. A brief description of the type of business in which the corporation intends to engage:
The purpose of the corporation is to serve as a Registered Marijuana Dispensary ("RMD").
- f. The street address of the principal office of the corporation:
70 Industrial Avenue East, Lowell, MA 01852
- g. The street address where the records of the corporation required to be kept in the commonwealth are located is:

70 Industrial Avenue East, Lowell, MA 01852, which is
(number, street, city or town, state, zip code)

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

Signed by: **Mary-Alice Miller**
(signature of authorized individual)

- ☐ Chairman of the board of directors,
- ☐ President,
- ☒ Other officer,
- ☐ Court-appointed fiduciary,

on this **12th** day of **April**, **2018**

COMMONWEALTH OF MASSACHUSETTS

William Francis Galvin
Secretary of the Commonwealth
One Ashburton Place, Boston, Massachusetts 02108-1512

**Articles of Entity Conversion of a
Domestic Non-Profit with a Pending Provisional or
Final Certification to Dispense Medical Use Marijuana
to a Domestic Business Corporation**
(General Laws Chapter 156D, Section 9.53; 950 CMR 113.30)

I hereby certify that upon examination of these articles of conversion, duly submitted to me, it appears that the provisions of the General Laws relative thereto have been complied with, and I hereby approve said articles; and the filing fee in the amount of \$_____ having been paid, said articles are deemed to have been filed with me this _____ day of _____, 20_____, at _____ a.m./p.m.
time

Effective date: _____
(must be within 90 days of date submitted)

WILLIAM FRANCIS GALVIN
Secretary of the Commonwealth

Examiner

Name approval

C

M

Filing fee: Minimum \$250

TO BE FILLED IN BY CORPORATION
Contact Information:

Telephone: _____

Email: _____

Upon filing, a copy of this filing will be available at www.sec.state.ma.us/cor. If the document is rejected, a copy of the rejection sheet and rejected document will be available in the rejected queue.

As of April 13, 2018

PATRIOT CARE CORP.

BYLAWS

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BYLAWS
OF
PATRIOT CARE CORP.

ARTICLE I

ARTICLES OF ORGANIZATION

The name of the corporation shall be as set forth in the articles of organization. The corporation shall have the purpose of engaging in any lawful business, unless a more limited purpose is set forth in the articles of organization. The powers of the corporation shall be all powers as set forth in the Massachusetts Business Corporation Act (the “Act”), unless more limited powers or restrictions on any powers are set forth in the articles of organization. The powers of the corporation’s directors and Shareholders, or any class of Shareholders if the corporation has more than one class of stock, and all matters concerning the conduct and regulation of the business and affairs of the corporation shall be subject to such provisions in regard thereto, if any, as are set forth in the articles of organization. In the event of any inconsistency between the articles of organization and these bylaws, the articles of organization shall be controlling. All references in these bylaws to the articles of organization shall be construed to mean the articles of organization of the corporation as from time to time in effect.

ARTICLE II

SHAREHOLDERS

1. Annual Meeting.

The annual meeting of shareholders shall be held at 10:00 A.M., or at such other time as the board of directors shall determine, on June 30 in each year unless such date is a legal holiday. If such date is a legal holiday, then the annual meeting shall be held at the same hour on the next succeeding business day not a legal holiday. The purposes for which an annual meeting is to be held include the election of directors and transacting such other business as may properly be brought before such meeting.

2. Special Meetings.

A special meeting of shareholders may be called at any time by the president or by the directors. Upon written application of one or more Shareholders who hold in the aggregate at least ten percent of all votes, which written application or applications shall be signed and dated by such shareholders and shall state the purpose for which the meeting is to be held, a special meeting shall be called by the secretary, or in case of the death, absence, incapacity or refusal of the secretary, by any other officer. Each call of a meeting shall state the place, date, hour and purposes of the meeting.

3. Place of Meetings.

The place at which any special or annual meeting of shareholders shall be held shall be fixed by the board of directors. Meetings of shareholders may be held at any physical location in or outside Massachusetts. Any adjourned session of any meeting of the shareholders shall be held at the place designated in the vote of adjournment, or if no such place is designated, at the same place or by the same remote communication method as the adjourned meeting.

In addition, the board of directors may authorize any meeting to be held solely by remote communication with no fixed physical location, or may authorize that any shareholder or proxy not physically present at a meeting may participate in the meeting and be deemed present and entitled to vote. In the event that any shareholder or proxy is permitted to participate in a meeting by means of remote electronic communication: (a) the corporation shall implement reasonable measures to verify that each person present and permitted to vote at a meeting is a shareholder or proxy; (b) the corporation shall implement reasonable measures to provide such shareholders and proxies a reasonable opportunity to participate in the meeting and vote; and (c) if a shareholder or proxy votes or takes other action by remote communication at the meeting, a record of the vote or other action shall be maintained by the corporation.

4. Record Date for Purpose of Meetings.

The directors may fix in advance a time not more than 70 days before the date of any meeting of shareholders as the record date for determining the shareholders having the right to notice of and to vote at such meeting and any adjournment thereof. In such case only shareholders of record on such date shall have such right, notwithstanding any transfer of shares on the books of the corporation after the record date. If no record date is fixed, the record date for determining shareholders having the right to notice of or to vote at a meeting of shareholders shall be at the close of business on the day before the day on which notice is given. If any meeting is adjourned to a date more than 120 days after the date fixed for the original meeting, the directors shall fix a new record date.

5. Notice of Meetings.

Written notice of the place, day and hour of all meetings of shareholders shall be given by the secretary, the assistant secretary or an officer designated by the directors, at least seven days but no more than 60 days before the meeting, to each shareholder entitled to vote thereat and to each shareholder who, by the Act, under the articles of organization or under these bylaws, is entitled to such notice. Notice of an adjourned meeting shall be given only if a new record date is fixed, in which case notice shall be given to all shareholders as of the new record date. The notice of a meeting shall state the purposes of the meeting. At a special meeting of shareholders, only business within the purpose or purposes described in the meeting notice may be conducted. Notice may be given by leaving such notice with the shareholder or at his residence or usual place of business, by mailing it, postage prepaid, and addressed to such shareholder at his address as it appears in the books of the corporation, by facsimile telecommunication directed to a number furnished by the shareholder for the purpose, by electronic mail to the electronic mail address of the shareholder as it appears in the books of the corporation, or by any other electronic transmission (defined as any process of communication that does not directly involve the physical transfer of paper and that is suitable for the retention, retrieval and reproduction of information by the recipient). The

corporation shall be entitled to rely on the address of a shareholder last notified to the corporation. In case of the death, absence, incapacity or refusal of the secretary, the assistant secretary or the officer designated by the directors, such notice may be given by any other officer or by a person designated either by the secretary or by the person or persons calling the meeting or by the board of directors. Whenever notice of a meeting is required to be given to a shareholder under any provision of the Act or of the articles of organization or these bylaws, no such notice need be given to a shareholder, if a written waiver of notice, executed before or after the meeting by such shareholder or his attorney, thereunto authorized, is filed with the records of the meeting.

6. Shareholders List for Meeting.

After fixing a record date for a meeting of shareholders, the secretary shall prepare an alphabetical list of all shareholders who are entitled to notice of the meeting. The shareholders list shall be available for inspection by any shareholder, his agent or attorney during the period beginning two days after notice of the meeting is given and continuing through the meeting at the corporation's principal office, at a place identified in the meeting notice or, if the meeting is to be held only by remote communication, on a reasonably accessible electronic network, provided that the information required to gain access to such list is provided with the notice of the meeting. A shareholder or his agent or attorney may copy the list at the principal office at his own expense as permitted by the Act.

7. Quorum.

At any meeting of the shareholders, a majority in interest of all the shares issued, outstanding and entitled to vote upon a question to be considered at such meeting shall constitute a quorum for the consideration of such question, except that, if two or more voting groups are entitled to vote upon such question as separate voting groups, then, in the case of each such voting group, a quorum shall consist of a majority of the votes entitled to be cast by the voting group for action on that matter. Notwithstanding the foregoing, shareholders, by a majority of the votes properly cast upon the question whether or not a quorum is present, may adjourn any meeting from time to time, and the meeting may be held as adjourned without further notice. A share once represented for any purpose at a meeting is deemed present for quorum purposes for the remainder of the meeting and for any adjournment thereof, unless (a) the shareholder attends solely to object to lack of notice, defective notice, or the conduct of the meeting on other grounds, and does not vote the shares or otherwise consent that they are to be deemed present; or (b) in the case of an adjournment, a new record date is or shall be set for that adjourned meeting.

8. Voting and Proxies.

Unless otherwise provided by the articles of organization, each shareholder shall have one vote for each share held by him of record on the record date and entitled to vote on the question or questions to be considered at any meeting of the shareholders according to the records of the corporation. Shareholders may vote either in person or by proxy appointed by written appointment form signed by the shareholder or his attorney in fact. An appointment form shall be valid for the period stated therein, or, if no period is stated, for a period of 11 months from the date the shareholder signed the form, or the date of its receipt by the secretary or his agent, if undated. Appointment forms shall be filed with the secretary or other officer or agent authorized to tabulate votes before being voted. Except as otherwise limited therein, appointment forms appointing

proxies for a particular meeting shall entitle the persons named therein to vote at any adjournment of such meeting but shall not be valid after final adjournment of such meeting.

9. Action at Meeting.

When a quorum of a voting group is present for the consideration of a matter at any meeting of the shareholders, favorable action on a matter, otherwise than the election of directors, is taken by the voting group if a majority in interest of the shares present in person or by proxy and entitled to vote on such question votes in favor of the action, except where a larger vote is required by the Act, the articles of organization or these bylaws. Any election of directors by a voting group shall be determined by a plurality of the votes cast by shareholders in the voting group present in person or by proxy at the meeting and entitled to vote in the election. No ballot shall be required for such election unless requested by a shareholder present in person or by proxy at the meeting and entitled to vote in the election. Shares of the corporation are not entitled to vote if they are owned, directly or indirectly, by another entity of which the corporation owns, directly or indirectly, a majority of the voting interests. The corporation may, however, vote any shares, including its own shares, held by it, directly or indirectly, in a fiduciary capacity.

10. Action without Meeting.

Any action required or permitted to be taken at any meeting of the shareholders may be taken without a meeting by all shareholders entitled to vote on the action, or if the articles of organization so provide, by shareholders having not less than the minimum number of votes necessary to take the action at a meeting at which all shareholders entitled to vote on the action are present and voting, as evidenced by written consents of such shareholders that describe the action taken, are signed by shareholders having the requisite votes, bear the date of the signatures of such shareholders, and are delivered to the corporation for inclusion with the records of meetings within 60 days of the date of the earliest dated consent delivered to the corporation. The corporation must, at least seven days before it takes any action in reliance on consent obtained in accordance with this provision, give written notice of its intended action to shareholders not entitled to vote on the action in any case where the Act would require such notice if the action were to be taken by voting shareholders at a meeting, and, if the action will be taken with less than unanimous consent, to all shareholders entitled to vote who did not consent to the action. Such notice shall be accompanied by the same material that the Act or these bylaws would require to be sent to such shareholders with a notice of meeting. The corporation may, for convenience, specify an effective date for such consents, provided that the corporation shall not take action in reliance upon such consents except in compliance with the articles of organization and these bylaws.

11. Electronic Action.

Any vote, consent, waiver, proxy appointment or other action by a shareholder shall be considered given in writing, dated and signed if it consists of an electronic transmission that allows the corporation to determine: (a) the date the transmission was sent; and (b) that the sender of the transmission was the relevant shareholder, proxy, or agent, or a person authorized to act on any such person's behalf. The date on which the electronic transmission was sent shall be considered the date on which it was signed.

ARTICLE III

DIRECTORS

1. Powers.

All corporate power shall be exercised by or under the authority of, and the business and affairs of the corporation shall be managed under the direction of, a board of directors, subject to any limitation set forth in the articles of organization or in a shareholders' agreement. In the event of a vacancy in the board of directors, the remaining directors may exercise the powers of the full board until the vacancy is filled.

2. Election and Enlargement of Board.

The board of directors shall consist of at least one director. Unless otherwise provided in the articles of organization, if the corporation has more than one shareholder, the number of directors shall not be less than three, except that whenever there shall be only two shareholders, the number of directors shall not be less than two. The board of directors shall consist of a number of directors not less than the number prescribed by the preceding sentence and not more than five, and within such range, the number of directors shall be fixed from time to time by vote of a majority of the directors then in office or by the shareholders. The number of directors may be decreased or increased beyond such range only by vote of the shareholders. No director need be a shareholder.

3. Vacancies.

Any vacancy in the board of directors, including a vacancy resulting from the enlargement of the board, may be filled by the shareholders, by the board of directors, or if the directors remaining in office constitute fewer than a quorum, they may fill the vacancy by the vote of a majority of all the directors remaining in office. If the vacant office was held by a director elected by a voting group of shareholders, only the shareholders of that voting group or directors elected by that voting group are entitled to fill the vacancy.

4. Tenure.

Except as otherwise provided by the articles of organization or by these bylaws, each director shall hold office until the next annual meeting of shareholders and thereafter until such director's successor is elected and qualified or until such director sooner dies, resigns, is removed or becomes disqualified.

5. Committees.

The directors may, by vote of a majority of all directors then in office, elect from their number an executive or other committees, provided however that if the articles of organization or these bylaws provide that the number of directors required to take board action is greater than a majority of all directors then in office, then the vote of such greater number shall be required to elect any committee. Except as the directors may otherwise determine, any such committee may make rules for the conduct of its business, but unless otherwise provided by the directors or in such rules, its business shall be conducted as nearly as may be in the same manner as is provided by these bylaws for the directors. The directors may delegate to any committee some or all of their

powers except those which they are prohibited from delegating by any provision of law or by the articles of organization or these bylaws. Without limitation of the foregoing, a committee may not (a) authorize distributions; (b) approve or propose to shareholders action that is required by law to be approved by shareholders; (c) change the number of the board of directors, remove directors from office or fill vacancies on the board of directors; (d) amend the articles of organization; (e) adopt, amend or repeal these bylaws; or (f) authorize or approve reacquisition of shares, except according to a formula or method prescribed by the board of directors.

6. Meetings.

Regular meetings of the directors may be held without call or notice at such places and at such times as the directors may from time to time determine. Any or all of the directors may participate in a meeting of the directors or of a committee thereof by, or conduct the meeting through the use of, any means of communication by which all directors participating may simultaneously hear each other during the meeting; and participation by such means shall constitute presence in person at any such meeting.

A regular meeting of the directors may be held immediately following the annual meeting of shareholders at the same place as such shareholders' meeting. Special meetings of the directors may be held at any time and place designated in a call of the meeting by the chairman of the board, if any, the president or two or more directors.

7. Notice of Special Meetings.

Notice of the date, time and place of all special meetings of the directors shall be given to each director by the secretary, or assistant secretary, or by the officer or one of the directors calling the meeting. Notice shall be given to each director in person, by telephone, voice mail, facsimile telecommunication, telegram or other electronic means sent to his usual or last known business or home address or phone number or by electronic mail to the electronic mail address of the director as last notified to the corporation at least 24 hours in advance of the meeting or by mailing it to either such business or home address at least 48 hours in advance of the meeting. Notice need not be given to any director if a written waiver of notice, executed by him before or after the meeting, is filed with the records of the meeting, or to any director who attends the meeting without protesting, prior to or at the meeting's commencement, the lack of notice to him. A notice or waiver of notice of a directors' meeting need not specify the purposes of the meeting.

8. Quorum.

At any meeting of the directors, a quorum of the board of directors shall be a majority of the number of directors fixed pursuant to Section 2 of this Article, or if no such number was prescribed, a majority of the directors in office immediately before the meeting begins. Any meeting may be adjourned from time to time by a majority of the votes cast upon the question, whether or not a quorum is present, and the meeting may be held as adjourned without further notice.

9. Action at Meeting.

If a quorum is present when a vote is taken, the vote of a majority of the directors present is an act of the board of directors, unless the articles of organization or these bylaws require the vote of a greater number of directors.

10. Action by Consent.

Any action required or permitted to be taken at any meeting of the directors may be taken without a meeting if all directors then in office consent to the action in a writing signed by each director, or by electronic transmission delivered to the corporation to the address specified by the corporation for the purpose or, if no address is specified, to the principal office of the corporation addressed to the secretary or other officer or agent having custody of the records of proceedings of directors, provided that such written consents and/or electronic transmissions shall be included in the minutes or filed with the corporate records reflecting the action taken. Action taken by written consent is effective when the last director signs or delivers consent, unless the consent specifies a different effective date. Consents given in accordance with this provision shall be treated as a vote of the directors for all purposes.

ARTICLE IV

OFFICERS

1. Enumeration.

The officers of the corporation shall consist of a president, a treasurer, a secretary, and such other officers, if any, including a chairman and a vice chairman of the board of directors, one or more vice presidents, assistant treasurers and assistant secretaries, as the incorporators at their initial meeting or the directors from time to time may choose or appoint.

2. Appointment.

The president, treasurer and secretary shall be appointed annually by the directors at their first meeting following the annual meeting of shareholders. Other officers, if any, may be appointed by the board of directors at such meeting or at any other time.

3. Vacancies.

If any office becomes vacant by reason of death, resignation, removal, disqualification or otherwise, the directors may choose a successor or successors, who shall hold office for the unexpired term, except as otherwise provided by the Act, by the articles of organization or by these bylaws.

4. Qualification.

The president may, but need not be, a director. No officer need be a shareholder. Any two or more offices may be held by the same person. Any officer may be required by the directors to give bond for the faithful performance of his duties to the corporation in such amount and with such sureties as the directors may determine.

5. Tenure.

Except as otherwise provided by the articles of organization or by these bylaws, the president, treasurer and secretary shall hold office until the first meeting of the directors following the annual meeting of shareholders, and thereafter until such officer's successor is chosen and

qualified; and all other officers shall hold office until the first meeting of the directors following the annual meeting of the shareholders or the special meeting in lieu thereof, unless a shorter term is specified in the vote choosing or appointing them, or in each case until such officer sooner dies, resigns, is removed or becomes disqualified.

6. Chairman and Vice Chairman of the Board.

A chairman or vice chairman of the board of directors shall have such powers as the directors may from time to time designate. Unless the board of directors otherwise specifies, the chairman of the board, or in his absence the vice chairman, shall preside at all meetings of the shareholders and of the board of directors. The chairman or vice chairman must be a director.

7. President and Vice President.

Except as otherwise determined by the directors, the president shall be the chief executive officer of the corporation and shall, subject to the direction of the directors, have general supervision and control of its business. Unless the board of directors otherwise specifies, in the absence of the chairman and vice chairman, if any, of the board of directors, the president shall preside, when present, at all meetings of shareholders and of the board of directors.

Any vice president shall have such powers as the directors may from time to time designate.

8. Treasurer and Assistant Treasurers.

The treasurer shall, subject to the direction of the directors, have general charge of the financial concerns of the corporation and the care and custody of the funds and valuable papers of the corporation, and books of account and accounting records. He shall have power to endorse for deposit or collection all notes, checks, drafts, and other obligations for the payment of money payable to the corporation or its order, and to accept drafts on behalf of the corporation.

Any assistant treasurer shall have such powers as the directors may from time to time designate.

9. Secretary and Assistant Secretary.

Unless a transfer agent is appointed, the secretary shall keep or cause to be kept the stock and transfer records of the corporation in which are contained the names of all shareholders and the record address and the amount of shares held by each. The secretary shall record all proceedings of the shareholders in a paper record, or in another form capable of conversion into a paper record within a reasonable time. Such records shall be kept at the principal office of the corporation or at the office of its transfer agent or of the secretary and shall be open at all reasonable times to the inspection of any shareholder.

If a secretary is elected, he shall record all proceedings of the directors in a paper record, or in another form capable of conversion into a paper record within a reasonable time. Any assistant secretary shall have such powers as the directors may from time to time designate. In the absence of the secretary from any meeting of the directors, any assistant secretary, or a temporary secretary designated by the person presiding at such meeting, shall record such proceedings.

10. Other Powers and Duties.

Each officer shall, subject to these bylaws, have in addition to the duties and powers specifically set forth in these bylaws, such duties and powers as are customarily incident to his office, and such duties and powers as the directors may from time to time designate.

ARTICLE V

RESIGNATIONS AND REMOVALS

1. Resignation.

Any director or officer may resign at any time by delivering his resignation in writing to the chairman of the board, if any, the president, the treasurer or the secretary or to a meeting of the directors. Such resignation shall be effective upon receipt unless specified to be effective at some other time.

2. Removal of Director.

A director (including persons elected by directors to fill vacancies in the board) may be removed from office (a) with or without cause by majority vote of the shareholder voting group entitled to appoint such director, or (b) with cause by vote of the greater of a majority of the directors then in office or of the number of directors otherwise required to take an action of the board, except that if a director is appointed by a voting group of shareholders, only directors appointed by that voting group may vote to remove him. A director may be removed by the shareholders or the directors only at a meeting called for the purpose of removing him and the meeting notice must state that the purpose, or one of the purposes, of the meeting is removal of the director.

3. Removal of Officer.

The directors may remove any officer at any time with or without cause.

4. No Right to Compensation.

No director or officer resigning and (except where a right to receive compensation shall be expressly provided in a duly authorized written agreement with the corporation) no director or officer removed, shall have any right to any compensation as such director or officer for any period following his resignation or removal, or any right to damages on account of such removal, whether his compensation be by the month or by the year or otherwise, unless in the case of a resignation, the directors, or in the case of a removal, the body acting on the removal, shall in their or its discretion provide for compensation.

ARTICLE VI

SHARES

1. Amount Authorized.

The total number of authorized shares shall be as fixed in the articles of organization.

2. Stock Certificates; Statements for Uncertificated Stock.

Shares of the corporation may be certificated or uncertificated. Each shareholder shall be entitled to: (a) for certificated stock, a certificate of the stock of the corporation setting forth the number of shares and the class and the designation of the series in such form as shall, in conformity with law, be prescribed from time to time by the directors; and (b) for uncertificated stock, a written information statement setting forth the number of shares and the class and the designation of the series of the stock. Each certificate shall be signed by any two of the following officers: the president, any vice president, the treasurer, any assistant treasurer, the secretary or any assistant secretary, either by real or facsimile signatures, and may bear the corporate seal or its facsimile. In case any officer who has signed or whose facsimile signature has been placed on such certificate shall have ceased to be such officer before such certificate is issued, it may be issued by the corporation with the same effect as if he were such officer at the time of its issue.

Every certificate or information statement for shares which are subject to any restriction on transfer pursuant to the articles of organization, these bylaws or any agreement to which the corporation is a party shall have the restriction noted conspicuously on the certificate or information statement and shall also set forth on the face or back either the full text of the restriction or a statement of the existence of such restriction and a statement that the corporation will furnish a copy thereof to the holder of such certificate or statement upon written request and without charge. Every certificate or statement issued when the corporation is authorized to issue more than one class or series of stock shall set forth on its face or back either the full text of the preferences, voting powers, qualifications and special and relative rights of the stock of each class and series authorized to be issued or a statement of the existence of such preferences, powers, qualifications and rights and a statement that the corporation will furnish a copy thereof to the holder of such certificate or statement upon written request and without charge.

3. Transfers.

Subject to the restrictions, if any, stated or noted on the stock certificates or information statements, shares may be transferred on the books of the corporation by: (a) for certificated stock, the surrender to the corporation or its transfer agent of the certificate therefor properly endorsed or accompanied by a written assignment and power of attorney properly executed, with necessary transfer stamps affixed, and with such proof of the authenticity of signature as the corporation or its transfer agent may reasonably require; and (b) for uncertificated stock, by delivery to the corporation or its transfer agent of an instruction with a request to register a transfer properly executed by the transferring shareholder, and with such proof of authenticity of signature as the corporation or its transfer agent may reasonably require. Except as may be otherwise required by the Act, by the articles of organization or by these bylaws, the corporation shall be entitled to treat the record holder of shares as shown on its books as the owner of such shares for all purposes,

including the payment of dividends and the right to receive notice and to vote with respect thereto, regardless of any transfer, pledge or other disposition of such shares, until the shares have been transferred on the books of the corporation in accordance with the requirements of these bylaws.

4. Record Date for Purposes Other Than Meetings.

The directors may fix in advance a time not more than 70 days preceding the date for the payment of any dividend or the making of any distribution to shareholders or the last day on which the consent or dissent of shareholders may be effectively expressed for any purpose, as the record date for determining the shareholders having the right to receive such dividend or distribution or the right to express such consent or dissent. In such case only shareholders of record on such date shall have such right, notwithstanding any transfer of shares on the books of the corporation after the record date. If no record date is fixed, the record date for determining shareholders shall be at the close of business on the day on which the board of directors acts with respect thereto.

5. Replacement of Certificates.

In case of the alleged loss or destruction or the mutilation of a stock certificate, a duplicate certificate may be issued in place thereof, upon such terms as the directors may prescribe.

ARTICLE VII

MISCELLANEOUS PROVISIONS

1. Fiscal Year.

The fiscal year of the corporation shall end on the date determined from time to time by the board of directors.

2. Seal.

The seal of the corporation shall, subject to alteration by the directors, consist of a flat-faced circular die with the word "Massachusetts", together with the name of the corporation and the year of its organization cut or engraved thereon.

3. Registered Agent and Registered Office.

The corporation shall continuously maintain in Massachusetts: (a) a registered agent who may be an officer of the corporation or another individual, a domestic corporation or not-for-profit domestic corporation, or a foreign corporation or not-for-profit foreign corporation qualified to do business in Massachusetts; and (b) a registered office, which may, but need not be, the same as any of its places of business. The business office of the registered agent shall also be the registered office of the corporation. The corporation shall record any change of its registered office or registered agent by filing a statement of change with the Secretary of the Commonwealth.

4. Execution of Instruments.

All deeds, leases, transfers, contracts, bonds, notes and other obligations authorized to be executed on behalf of the corporation shall be signed by the chairman of the board, if any, the

president or the treasurer except as the directors may generally or in particular cases otherwise determine.

5. Voting of Securities.

Except as the directors may otherwise designate, the president or treasurer may waive notice of, act and appoint any person or persons to act as proxy or attorney in fact for this corporation (with or without power of substitution) at any meeting of the shareholders, members or other constituent parties of any other corporation, organization or entity in which the corporation holds securities or other type of ownership interest.

6. Corporate Records to be Maintained and Available to All Shareholders.

The corporation shall keep in Massachusetts at the principal office of the corporation, or at an office of its transfer agent, secretary, assistant secretary or registered agent, a copy of the following records: (a) its articles of organization and bylaws then in effect; (b) resolutions adopted by the directors creating classes or series of stock and fixing their relative rights, preferences and limitations, if shares issued pursuant to those resolutions are outstanding; (c) the minutes of all shareholders' meetings, and records of all action taken by shareholders without a meeting, for the past three years; (d) all written communications to shareholders generally during the past three years, including annual financial statements issued pursuant to the Act; (e) a list of the names and business addresses of its current directors and officers; and (f) its most recent annual report delivered to the Massachusetts Secretary of the Commonwealth. Said copies and records may be kept in written form or in another form capable of conversion into written form within a reasonable time. A shareholder is entitled to inspect and copy such records, during regular business hours at the office at which they are maintained, on written notice given at least five business days before the date he wishes to inspect and copy.

7. Indemnification.

The corporation shall, to the fullest extent permitted by law, indemnify each of its directors and officers (including persons who serve at its request as directors, officers, or trustees of another organization in which it has any interest as a shareholder, creditor or otherwise or in any capacity with respect to any employee benefit plan), against all liabilities and expenses, including amounts paid in satisfaction of judgments, in settlement or as fines and penalties, and counsel fees, reasonably incurred by him in connection with the defense or disposition of any action, suit or other proceeding, whether civil or criminal, in which he may be involved or with which he may be threatened, while in office or thereafter, by reason of his being or having been such a director or officer, if: (a) he conducted himself in good faith and in the reasonable belief that his conduct was in the best interests of the corporation or at least not opposed to the best interests of the corporation, and, in the case of any criminal proceeding, he had no reasonable cause to believe his conduct was unlawful; or (b) he engaged in conduct for which he shall not be liable under the articles of organization; provided, however, that the corporation shall not indemnify or advance expenses to any person in connection with any action, suit, proceeding, claim or counterclaim initiated by or on behalf of such person. Such indemnification shall be provided although the person to be indemnified is not currently a director, officer, partner, trustee, employee or agent of the corporation or such other organization or no longer serves with respect to any such employee benefit plan.

Notwithstanding the foregoing, no indemnification shall be provided unless a determination has been made that indemnification is permitted by law for a specific proceeding:

(a) if there are two or more disinterested directors, by the board of directors by a majority vote of all the disinterested directors, a majority of whom for such purpose shall constitute a quorum, or by a majority of the members of a committee of two or more disinterested directors appointed by vote; or

(b) by special legal counsel selected either (i) in the manner prescribed in clause (a) above, or (ii) if there are fewer than two disinterested directors, by the board of directors, in which case directors who do not qualify as disinterested directors may participate in the selection; or

(c) by the holders of a majority of the corporation's outstanding shares at the time entitled to vote for directors, voting as a single voting group, exclusive of any shares owned by or voted under the control of any interested director or officer.

The right of indemnification hereby provided shall not be exclusive of or affect any other rights to which any director or officer may be entitled; nothing contained in this section shall affect any rights to indemnification to which employees, independent contractors or agents, other than directors and officers, may be entitled by contract or otherwise under law. As used in this paragraph, the terms "director" and "officer" include their respective heirs, executors and administrators, and an "interested" director or officer is one against whom in such capacity the proceedings in question or another proceeding on the same or similar grounds is then pending.

Any repeal or modification of the foregoing provisions of this section shall not adversely affect any right or protection of a director or officer of the corporation with respect to any acts or omission of such director or officer occurring prior to such repeal or modification.

8. Advance of Expenses.

The corporation shall, before final disposition of a proceeding, and to the fullest extent permitted by law, advance funds to pay for or reimburse the reasonable expenses incurred by a director, officer or other person who is a party to a proceeding for which he would be or may be entitled to indemnification as set forth in these bylaws, provided that he delivers to the corporation a written affirmation of his good faith belief that he has met the relevant standard of conduct described in these bylaws, and his written undertaking to repay any funds advanced if he is not entitled to mandatory indemnification under applicable law and it is ultimately determined that he has not met the relevant standard for indemnification set forth in these bylaws.

9. Amendments to Bylaws.

These bylaws may at any time be amended by vote of the shareholders or may be amended by vote of a majority of the directors then in office, except that bylaw provisions dealing with quorum or voting requirements for shareholders, including additional voting groups, may not be adopted, amended or repealed by the board of directors. Notice of any change to these bylaws by the directors, stating the substance of such change, shall be given to all shareholders entitled to vote on amending these bylaws not later than the time that notice of the shareholders' meeting next following such change is required to be given.

10. Director Conflict of Interest

A conflict of interest transaction is a transaction with the corporation in which a director has a material direct or indirect interest (an “Interested Director”). Without limiting the interests that may create conflict of interest transactions, a director has an indirect interest in a transaction if another entity in which he has a material financial interest or in which he is a general partner is a party to the transaction (a “Related Party”), or if another entity of which he is a director, officer, or trustee or in which he holds another position is a party to the transaction and the transaction is or should be considered by the board of directors of the corporation.

A conflict of interest transaction is not voidable by the corporation solely because of the director’s interest in the transaction if: (a) the material facts of the transaction and the director’s interest were disclosed or known to the board or a committee of the board, and the board or committee authorized, approved or ratified the transaction by the vote of a majority of the directors on the board or committee who have no direct or indirect interest in the transaction, but a transaction may not be authorized, approved, or ratified by a single director; (b) the material facts of the transaction and the director’s interest were disclosed or known to the shareholders entitled to vote and they authorized, approved, or ratified the transaction by the vote of a majority of the shares entitled to vote or (c) the transaction was fair to the corporation. In the case of clause (b) above, shares owned by or voted under the control of any Interested Director or Related Party shall not be entitled to vote.



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

mass.gov/dor

Letter ID: L1242986048
Notice Date: August 18, 2020
Case ID: 0-000-887-534



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



PATRIOT CARE CORP
321 BILLERICA RD STE 204
CHELMSFORD MA 01824-4100

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, PATRIOT CARE CORP 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, 8:30 a.m. to 4:30 p.m..

Visit us online!

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

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

Edward W. Coyle, Jr., Chief
Collections Bureau



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

William Francis Galvin
Secretary of the
Commonwealth

Date: August 14, 2020

To Whom It May Concern :

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

PATRIOT CARE CORP.

is a domestic corporation organized on **April 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.

A handwritten signature in blue ink that reads "William Francis Galvin".

Secretary of the Commonwealth

Certificate Number: 20080317650

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

Processed by: tad



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

Charles D. Baker
GOVERNOR

Karyn E. Polito
LT. GOVERNOR



264245057

Rosalin Acosta
SECRETARY

Richard A. Jeffers
DIRECTOR

Patriot Care Corp
70 INDUSTRIAL AVENUE EAST
LOWELL, MA 01852

EAN: 22030540
September 18, 2020

Certificate Id:41077

The Department of Unemployment Assistance certifies that as of 9/18/2020 ,Patriot Care Corp 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



COLUCAR-01

SPYKOR

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

5/4/2020

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER Mesirow Insurance Services, Inc. 353 N Clark St 11th Floor Chicago, IL 60654	CONTACT NAME: Staci Pykor	
	PHONE (A/C, No, Ext): (312) 595-6651	FAX (A/C, No):
	E-MAIL ADDRESS: Staci.Pykor@Alliant.com	
	INSURER(S) AFFORDING COVERAGE	NAIC #
	INSURER A : Admiral Insurance Company	24856
INSURED Columbia Care, LLC 321 Billerica Rd., Ste 204 Chelmsford, MA 01824	INSURER B : Berkshire Hathaway Homestate Insurance Company	20044
	INSURER C :	
	INSURER D :	
	INSURER E :	
	INSURER F :	

COVERAGES

CERTIFICATE NUMBER:

REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input checked="" type="checkbox"/> CLAIMS-MADE <input type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: <input type="checkbox"/> POLICY <input type="checkbox"/> PROJECT <input checked="" type="checkbox"/> LOC OTHER:			CA000033684-02	4/21/2020	4/21/2021	EACH OCCURRENCE \$ 5,000,000
							DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 300,000
							MED EXP (Any one person) \$
							PERSONAL & ADV INJURY \$ 5,000,000
							GENERAL AGGREGATE \$ 5,000,000
							PRODUCTS - COMP/OP AGG \$ 5,000,000
	AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO OWNED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS ONLY <input type="checkbox"/> NON-OWNED AUTOS ONLY						COMBINED SINGLE LIMIT (Ea accident) \$
							BODILY INJURY (Per person) \$
							BODILY INJURY (Per accident) \$
							PROPERTY DAMAGE (Per accident) \$
	UMBRELLA LIAB <input type="checkbox"/> OCCUR EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE DED <input type="checkbox"/> RETENTION \$						EACH OCCURRENCE \$
							AGGREGATE \$
B	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) <input type="checkbox"/> Y / N If yes, describe under DESCRIPTION OF OPERATIONS below		N / A	AVWC134540	4/2/2020	4/2/2021	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTH-ER
							E.L. EACH ACCIDENT \$ 1,000,000
							E.L. DISEASE - EA EMPLOYEE \$ 1,000,000
							E.L. DISEASE - POLICY LIMIT \$ 1,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)
Location: 21 Milk Street, Boston, MA 02109

CERTIFICATE HOLDER

CANCELLATION

Evidence of Insurance

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE



Summary of Business Plan

Background

Patriot Care has successfully managed a vertically integrated medical marijuana operation since 2015 in the Commonwealth of Massachusetts, including one cultivation and manufacturing facility (Lowell) and three Medical Marijuana Treatment Centers (MTC) in Lowell, Boston and Greenfield. In 2019, the company received approval from the CCC to commence adult-use operations on a co-located basis at its Lowell and Greenfield facilities and it has been operating successfully and compliantly in that manner since that time. Patriot Care is applying now to co-locate an adult-use retail Marijuana Establishment at its MTC located at 21 Milk Street in Boston. The company's business plan noted below is based on the expectation of being vertically integrated in both the State's medical as well as adult-use programs and supplementing any remaining supply needs through wholesale arrangements with other licensed operators in the State. As such the business plan summary for cultivation, manufacturing and retail is presented together.

Cultivation & Manufacturing

In conjunction with servicing the incremental patient and customer demand associated with entering the adult-use market, Patriot Care has been increasing the efficiency of its cultivation and manufacturing operations. Over the past year and a half, the company installed LEDs, high efficiency rotovaps and extractors and is finalizing the installation of automated irrigation and fixed benches. The company is also re-insulating its building at 170 Lincoln Street in Lowell and expanding post-harvest operations. This includes expanded trimming and packaging rooms and automation for post-harvest processes including trimming, weighing, filling and packaging, labeling, kitchen automation etc. When completed in January 2021 the above will provide the following benefits:

- Increase biomass production by 60%
- Exponentially process more biomass and concentrated products which should allow the company to increase manufacture of wholesale products
- Reduce energy and water requirements for the facility
- Improve site hygiene and safety

The Company also intends to add to the footprint of the site in a phase 2 expansion which will further increase biomass production.



Patriot Care has been fully operational for 5 years and expects to generate sufficient cash flow from existing medical and adult-use marijuana operations to fund any remaining capital and operational expenses associated with further expansion. Any shortfall will be funded by the Company's parent company.

Patriot Care uses its primary production to supply its medical patients and adult-use consumers. Any shortfalls to projected needs have been filled by purchasing products wholesale from other state-licensed operators. The company intends to meet some of this need by procuring product from licensed social equity and economic empowerment cultivators as those operations get up and running. In that respect, the Company already has an LOI with one social equity cultivator with a provisional license from the CCC. To the extent that there is ultimately surplus production, the Company will consider utilizing this excess production to sell to other licensed MTCs and retail Marijuana Establishments in Massachusetts.

Dispensary

Given the operational intensity of the business, Patriot Care constantly reviews and refines its dispensing practices to ensure it continues to meet patient and adult-use customer demand while maintaining the same high standard of service and quality that patients, adult-use consumers and state regulatory partners have come to expect.

Over the past 7+ years, Patriot Care and its parent company Columbia Care have successfully designed, constructed, staffed and opened multiple medical and adult-use marijuana facilities in Massachusetts and nationwide under very tight timelines in a host of jurisdictions with starkly contrasting regulatory environments. The Patriot Care team is thus highly experienced in the complexities inherent in recruiting and training qualified staff and ensuring facilities open on time and are fully prepared to meet patient and adult-use consumer needs and preferences in accordance with all applicable regulations, as well as its own internal policies and procedures and performance standards. Patriot Care has conducted a detailed review of capacity utilization at each of its dispensaries currently operational in Massachusetts. Data reviewed included, among other items, number of point of sale systems deployed and/or available, average wait times across all days and times, staffing levels, vault size, and capacity limits. The current configuration of 21 Milk Street consists of 6 POS stations which has proven to be more than adequate to meet the medical demand without significant wait times and lines. The Company plans to add 16 more POS stations by reconfiguring the current sales floor and by utilizing the lower level of the facility. There will be a total of 22 POS stations – 13 on the main floor and 9 stations in the lower level.



The majority of preparation required by Patriot Care will be focused on reviewing and optimizing its standard operating procedures and work instructions to ensure the staff maintains a compliant operation. Our Massachusetts Market Director and the Dispensary General Manager will focus on the following training topics: Inventory management, recordkeeping, diversion prevention, patient identification and check-in processes. Patriot Care anticipates increasing dispensary headcount by approximately 20-30 employees to maintain current patient/adult-use consumer satisfaction and average wait times.

The applicant is currently operational and expects to generate sufficient cash flow from existing medical marijuana and adult-use operations to fund the anticipated capital and operational expenses associated with expansion into the adult-use market at 21 Milk Street. As noted above, any shortfall will be funded by the Company's parent company.

As noted earlier, the Company is vertically integrated and expects to be able to supply the majority of its needs from its own operations. To the extent that high quality products are available from other licensed cultivators and/or manufacturers in Massachusetts, and the demand exists, the Company will buy such products for re-sale at its MTC/ME locations in a manner similar to how it has operated for the past year and a half running both medical and adult-use dispensaries. The Company will, at all times, prioritize the availability of product for medical patients as required by State regulations.



Restricting Access to 21 or Older

The safety of the patient and surrounding community begins as soon as someone enters the building. Patients and caregivers will enter the building using the front entrance of 21 Milk Street, through the building lobby. Patients and caregivers will enter the building using the same main entrance of 21 Milk Street that they currently use and that others entering the building upstairs will use. Adult-use consumers will enter the building using a separate entrance located at the corner of Milk Street and Hawley Street. Once checked at that door by our guard for suitable ID to ensure that they are at least 21 years of age, they will then be allowed into the secure vestibule for a second ID check by our receptionist. The building contains approximately 25,000 sf of office space and is home to several other businesses. In accordance with 105 CMR 725.110 and 935 CMR 500.110 and as described in the CCTV, Access Control and Intrusion System Design Layout. Patriot Care plans to secure the perimeters of the dispensary facility in such a way that patient/caregiver/adult-use consumer access to the facility itself is only possible through one of the two entrances noted above, which will be within the view of a professionally installed and maintained surveillance camera system and will be protected and secured by locks and alarms. Qualifying patients, primary caregivers and adult-use consumers will only be permitted into the building by dispensary personnel once it has been determined that it is safe to do so (i.e. after confirmation through the surveillance system and video intercom that no security threats have been observed).

Registered Patient Access: The intake process of determining a patient's status involves the verification of two forms of identification including the Marijuana for Medical use patient card issued by the CCC as well as a valid secondary form of state-issued identification. The MA patient card identification will be verified via the CCC MMJ portal in The Medical Use of Marijuana System. The Medical Use of Marijuana System, the CCC MMJ portal, serves as the system of record with respect to a patient's status in the program. The state's system is active, maintained by the CCC and updated in real time following each patient interaction. If a patient's active status has been revoked, the system will indicate such and our reception and security staff are trained to deny entry to the facility to that patient. In addition, Patriot Care's Adilas POS system tracks the date of expiration of each form of patient identification and will trigger a warning if either expiration date has been passed. If the patient is in our database and attempts to enter with expired identification, we will note that in an internal log note within the patient's record in Adilas. Any attempts to produce identifications that are not substantiated by the CCC will be declined. Reception and security personnel will retain for the CCC and law enforcement any discovered fake program or identification cards presented.



Following the initial verification of status by the guard at the door, that individual will be allowed into a vestibule that is designed to be a “Man Trap” controlled by security/reception located behind a document transfer type window. At that point, secondary confirmation of patient/caregiver status will take place to include the following:

- Examination and confirmation as to the validity of the patients’ CCC Registration Card electronically via the CCC on-line system.
- Examination of the patient’s secondary form of identification as per 935 CMR 501.140 (2) photo confirmations, name that matches the name on the registration card, age, and expiration date (see above for acceptable forms of secondary identification).
- Confirmation of patient status and available medicine amount via CCC’s Medical Use of Marijuana Online System (“MMJ Online System”).
- Entry into Patriot Care’s Patient Registration System and into the Patient queue to be called in the order in which they arrived.

Adult-Use Consumer Access: Every individual seeking to enter as an adult-use consumer will be required to present a valid government-issued photo identification. The guard at the adult-use entry will do an initial review of the ID using a UV light pen to spot security measures embedded in the ID. The receptionist will also have a device to validate the ID of the adult-use consumer. If there is any doubt about the validity of a card, or whether the person presenting the card is the same person as the one shown on the card, then that person will be denied entry. Following the initial verification of status by the guard at the door, the adult-use consumer will be allowed into a vestibule that is designed to be a “Man Trap” controlled by security/reception located behind a document transfer type window. At that point, secondary and tertiary confirmation of adult-use consumer eligibility will take place to include the following:

- The receptionist will verify the identification of each adult-use consumer to ensure that they are at least 21 years of age or older. If the receptionist has any doubt about the validity of a card, or whether the person presenting the card is the same person as the one shown on the card, then the receptionist can deny entry to that person.
- At the point of sale, the sales associate will also verify the identification of each adult-use consumer to ensure that they are at least 21 years of age or older. If the sales associate has any doubt about the validity of a card, or whether the person presenting the card is the same person as the one shown on the card, then the receptionist can deny entry to that person.
- Adult-use patients will be entered into a queue in Adilas to be called in the order in which they arrived.



As an additional measure, Patriot Care will post, in a location that is visible from the point of entry to the dispensary sales area, 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 for the Medical Program, 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 marijuana program registration card; and
- The sale or diversion of marijuana to minors is a crime in violation of Massachusetts General Laws.

Following entry into the sales area, patients, caregivers and adult-use consumers will enter a queue depending on their status. There will be a physical separation (demarcated by a temporary or semi-permanent physical barrier) between POS registers designated for medical patients, and those POS registers designated for adult-use consumers. A holder of a valid medical marijuana card issued by MA may use either line and shall not be limited only to the medical use line. A medical patient can use the adult-use line to purchase adult-use product subject to applicable regulations but cannot purchase medical product in that line. For patients, caregivers and adult-use consumers requiring confidential consultation, they will meet with a sales associate in the Patient Education room. No marijuana or marijuana products may be brought into this room.

Registered Patients Queue: Following the confirmation of patient status, the patient or caregiver will be entered into the electronic queue in the Adilas system for the registered patient queue inside the sales area, and allowed to enter the secured sales area. Once a dispensary agent is available at a POS station designated for medical patients, he/she will call the patient, who may be waiting in the patient queue inside the dispensary sales area. At the point of sale (POS) redundant checking of patient/caregiver status with CCC and identification confirmation will take place. Sale entry will be electronically entered into Patriot Care's database as well as the CCC database. Patient purchase limits will be based on the limits shown in the CCC database. All returning patients or primary caregivers will be required to show their registration card as well as their secondary form of identification to gain admittance to the dispensary facility every time they visit the facility.

Adult-Use Consumer Queue: Following verification of eligibility based on age, adult-use consumers will be entered into an electronic queue in the Adilas system for the adult-use consumer queue inside the sales area and allowed to enter the secured sales area. Once a dispensary agent is available at a POS station designated for adult-use consumers, he/she will call the adult-use consumer, who may be waiting



in the adult-use queue inside the dispensary sales area. At the POS, the sales associate will again check the ID of the adult-use consumer to verify that they are at least 21 years of age or older. PATRIOT CARE CORP will refuse to sell marijuana to any consumer who is unable to produce a valid proof of identification and age. PATRIOT CARE CORP may refuse to sell marijuana products to a consumer if, in the opinion of the sales agent, based on the information available to the agent at that time, the consumer or the public would be placed at risk. Adult-use purchase limits will be no more than one ounce of marijuana or five grams of marijuana concentrate to a consumer per transaction.



Maintaining Financial Records

Cash Handling

Purpose

This policy establishes responsibility and the correct procedures for cash management for Sales Associates.

Responsibility

The sales associate is ultimately responsible for the proper management of the cash drawer assigned to them for the day.

Procedure

- Associate is assigned a sales position.
- MOD assigned Cash duties for the day retrieves a cash drawer from the vault.
- MOD and assigned Associate verify the cash drawer at \$200.
- Associate fills out the cash drawer sheet with proper denominations and coin count.
 - a. If drawer does not equal \$200 Associate does not except responsibility until the MOD corrects said drawer.
- MOD and Associate sign cash sheet meaning Associate takes ownership of the cash.
- The cash drawer is installed into the Sales position assigned, no other Associate or Manager may ring sales in on the cash drawer.
- When Associate is offered, and agrees to take a break, the Associate/ MOD must lock the cash drawer or remove the cash drawer and place it into the safe if another Associate is assigned to cover the sales position for the time of the break.
- When Associate returns from break, the Associate and MOD retrieve the drawer from the safe and the Associate brings the drawer back to a sales position and may continue to ring sales.
- When Sales Associate shift comes to an end, the Associate alerts the MOD. The MOD and Associate remove the drawer and bring it to the vault for counting.
- Sales Associate counts (with MOD verifying/ overseeing) the drawer back to \$200 and fills out the drawer sheet as described in the 4th steps.
- MOD will start a clean cash sheet for the next use of the drawer.
- MOD prints said Associates sales report.
- Sales Associate will count left over money and verify with total cash taken in is equal to the reported cash on report (with in = +/- \$2.
- MOD and Sales Associate reviews and verifies all debit transactions match what is reported on sales report.
- MOD and Sales Associate make a deposit or place in a deposit back for a combined drawer deposit.
- MOD and Sales Associate sign off on reconciled sales report.



Bank Deposits

Bank deposit procedures are different market by market. The exact procedure will be established with help from the Director of the Market and Accounting. Cash deposit frequency and the amount to deposit will depend on the sales volume for the dispensary, as determined by the Director of the Market, Finance and VP Security. Cash deposits will be picked up by a courier arranged for by Finance and approved by VP Security. Cash deposits will be taken by the courier to the Century Bank Operations Center.

Responsibility

General Managers are ultimately responsible for bank deposits. If they are going to be out on a day where a deposit is needed they must ensure that the AGM is trained and capable of performing the task at hand.

Procedure

All cash is to be handled in the same manner as making purchases.

- Funds Issued Form
 - Must be completed for all cash removed from Vault Cash
 - The form must contain a description of the expenditure
 - Bank Name, Deposit, Amount
 - E.g. Century Bank Deposit \$10,000
 - The cash being used must be counted and verified by a 2nd person who also needs to sign the form.
 - Cash must be counted on camera
 - The form must be completed in its entirety
- Funds Issued ("FI") forms and Deposit Receipts must be scanned up to Dropbox
 - Both the receipt and FI form are scanned and posted together
 - Dropbox - Receipts, Invoices and Funds Issued
 - Scan the Funds Issued as page 1, Receipt as page 2 in one PDF
 - Naming convention – Date Form(s) Vendor Amount
 - Example – 2.2.17 FI and Receipt Century Bank Deposit \$10,000
- Cash must be put in designated deposit bag and placed in the safe until time to make the deposit with the bank.

Before the deposit is made, please email the Director of the Market and Accounting with the exact amount prepped for deposit.

This SOP could vary by specific market needs. See the Director of the Market with any question.



Record Keeping

PATRIOT CARE CORP's policies for record keeping have been created to discourage unlawful activities and adhere to 935 CMR 500.105 (8), 935 CMR 501.105 (8) and 935 CMR 502.105(8) regarding the appropriate protocols for tracking all products from "seed to sale." The Director of the Market, in conjunction with the VP of Compliance and VP of Finance, shall safely and securely maintain all books, records, logs, notices, invoices, reports and other relevant company paperwork (together the "Documentation") and shall store such Documentation in the Company's secured files as required, and in either in paper or electronic form, depending upon the case. All material financial, tax, compliance and operating documentation will be scanned and stored in our customized seed-to-sale inventory control system, ADILAS™ or in our password protected financial reporting software Intaact.

The Director of the Market and VP of Finance will be responsible for maintaining all accounting and inventory invoices are maintained. The Director of the Market will also be responsible for ensuring all operations logbooks and personnel files are updated on a daily basis and event histories are documented in writing as they occur. The VP of Compliance will have final quality control responsibility and ensure all Company documents are being recorded, filed and stored in a manner consistent with the procedures required by the CCC and detailed throughout this manual. Failure for any employee to maintain current records will result in disciplinary action. Questions of materiality will be brought to the Director's attention, in the absence of specific guidance that any Documentation is immaterial, employees will assume that all Documentation is relevant and therefore must be properly scanned, filed and stored.

Only the VP of Compliance, the Director of the Market, the VP of Finance, the President of PATRIOT CARE CORP the Dispensary General Manager and the Head of Cultivation or their designee(s) shall have direct access to these sensitive materials. All documents shall be stored for a period of five (5) years or for at least the minimum required period under CCC regulations as outlined in 935 CMR 500.105(9), 935 CMR 501.105 (9) and 935 CMR 502.105. Any issues with record keeping shall be immediately reported to the VP of Compliance for quick resolution.

Tracking and Monitoring Inventory

It shall be the responsibility of PATRIOT CARE CORP's Inventory Manager to keep track of and monitor all inventory on the registered premises from the moment it is manufactured, produced or procured to the completion of its delivery. To minimize theft and diversion, all packaged inventory shall be affixed with a barcode that can



be scanned and efficiently tracked using physical inventory software. The software uses a handheld scanner application to scan and track the unique serial numbers associated with each unit of inventory. If inventory is found to be missing, the Inventory Manager shall notify the Facility/Security Manager and the other Managers on site to begin an internal investigation to determine how, when and where the inventory was missing and if it was lost or stolen. The CCC and local law enforcement shall be notified as applicable.

PATRIOT CARE CORP's Management shall perform monthly inventory attestations and audits to ensure accuracy of all records as required by the CCC. In addition, PATRIOT CARE CORP shall conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory. The record of each inventory shall include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures and titles of the individuals who conducted the inventory.

PATRIOT CARE CORP shall conduct a monthly analysis of its adult-use POS equipment and sales data to determine that no software has been installed that could be used to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. The Company shall maintain records that it has performed the monthly analysis and produce it upon request to the CCC. If the Company 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:

- It shall immediately disclose the information to the CCC
- It shall cooperate with the CCC in any investigation regarding manipulation or alteration of sales data; and
- Take such other action directed by the CCC to comply with 935 CMR 500.105 and 935 CMR 501.105

Business records maintained in ADILAS™ database:

- Assets: Invoices and Deposits
- Monetary Transactions: Qualified Patients and Designated Caregivers sales, sales to adult-use consumers, Inventory Records and Controls
- Sales records including the quantity, form and cost of marijuana products, tracking of taxable sales for adult-use marijuana products as well as accessory sales. The Company will comply with 830 CMR 62C.25.1 with respect to record retention
- Sales settled by cash, debit card or other forms of payment allowed by our bank
- Patient Records: Personal information, CCC registration and expiration dates, transaction history
- Vendors: Quotes, Invoices, Receipts
- Business Records maintained in Intaact:
- Assets: Accounts Receivables, Quotes, Invoices, Deposits



- Liabilities: Accounts Payables, Expenses and Receipts, Manager/Employee Time clocks, Payroll
- Transactions: Qualified Patients and Designated Caregivers sales
- Vendors: Quotes, Invoices, Receipts
- Business Records are backed up electronically to Dropbox

All business records are systematically and automatically filed and electronically maintained for a period of seven (7) years from the date of creation to show a true, accurate, legible, and complete record of business activities conducted by PATRIOT CARE CORP.

The company's electronic records are continuously backed up and stored in Dropbox or Box or stored on ADILAS™, which stores all information through a server-based virtual data portal.

All inventory and cash will be kept in the safe or vault room overnight, and all cash must be in the safe except for the daily tills.

The company's electronic records are continuously backed up and stored in Dropbox (or comparable) or stored on ADILAS™, which stores all information through a server-based virtual data portal.

Each night, verification of sales, inventory controls, and patient records and dispensing will be completed in accordance with 935 CMR 500.110 and 935 CMR 501.110.

Certification of compliance and completion must be done at the end of each business day by the General Manager or Manager on duty. The GM or Manager on duty will record this information in the ADILAS™ system or electronically.

The safe will be opened in the morning upon the manager's arrival in order to count the previous night's receipts and count the employee's starting cash register totals to dispense the starting inventory for each employee.

During the business day, the manager on duty only opens the safe to complete specific tasks, such as replenishing inventory and making deposits.



Energy Compliance Plan – 21 Milk Street

Patriot Care Corp, in accordance with 935 CMR500.105(15), and 935 CMR 501.105(15), is committed to energy efficiency and conservation at its 21 Milk Street location in the following manners:

1. All drawings have been developed and are in compliance with the 2015 International Energy Conservation Code
2. The Energy Comcheck report is included in the MEP set of drawings showing full compliance to the 2015 IEC code.
3. LED lighting has been specified and is installed throughout the dispensary. Future facility expansions will also be installed with dimmable LED lighting.
4. The front of house external walls compromises of large fenestrations (windows and doors) which allow a significant amount of natural light into the building. Our designs have utilized this light which allows for a reduction in supplemental lighting requirements.
5. In early 2020 old inefficient HVAC heat pumps were replaced with modern energy efficient heat pumps.
6. Thermostats installed are modern occupancy sensed and timer programmable units. This allowed an occupied and unoccupied setting variation be programmed which allows for energy reduced operations outside of operating hours.
7. Consideration for renewable energy was investigated, however since we are the ground floor tenant in a multi-story city building there is not available space to mount a PV array on the building. The roof top of the building is taken up with Emergency generators and HVAC equipment. Wind power is not feasible in this location. Since renewable energy options are not possible at this site, emphasis was put on energy reduction measures within the site as listed above.



Recordkeeping Procedures

Record Keeping

PATRIOT CARE CORP's policies for record keeping have been created to discourage unlawful activities and adhere to 935 CMR 500.105 (8), 935 CMR 501.105 (8) and 935 CMR 502.105(8) regarding the appropriate protocols for tracking all products from "seed to sale." The Director of the Market, in conjunction with the VP of Compliance and VP of Finance, shall safely and securely maintain all books, records, logs, notices, invoices, reports and other relevant company paperwork (together the "Documentation") and shall store such Documentation in the Company's secured files as required, and in either in paper or electronic form, depending upon the case. All material financial, tax, compliance and operating documentation will be scanned and stored in our customized seed-to-sale inventory control system, ADILAS™ or in our password protected financial reporting software Intaact. PATRIOT CARE CORP shall maintain records in accordance with generally accepted accounting principles (GAAP), per 935 CMR 500.105(9)

The Director of the Market and VP of Finance will be responsible for maintaining all accounting and inventory invoices are maintained. The Director of the Market will also be responsible for ensuring all operations logbooks and personnel files are updated on a daily basis and event histories are documented in writing as they occur. Per 935 CMR 500.030 and 935 CMR 500.105(9), the following personnel records are maintained:

- Job description for each agent
- A personnel record for each agent
- A staffing plan that demonstrates accessible business hours
- Personnel policies and procedures
- All background check reports obtained

The VP of Compliance will have final quality control responsibility and ensure all Company documents are being recorded, filed and stored in a manner consistent with the procedures required by the CCC and detailed throughout this manual. Failure for any employee to maintain current records will result in disciplinary action. Questions of materiality will be brought to the Director's attention, in the absence of specific guidance that any Documentation is immaterial, employees will assume that all Documentation is relevant and therefore must be properly scanned, filed and stored.

Only the VP of Compliance, the Director of the Market, the VP of Finance, the President of PATRIOT CARE CORP the Dispensary General Manager and the Head of



Cultivation or their designee(s) shall have direct access to these sensitive materials. All documents shall be stored for a period of five (5) years or for at least the minimum required period under CCC regulations as outlined in 935 CMR 500.105(9), 935 CMR 501.105 (9) and 935 CMR 502.105. Any issues with record keeping shall be immediately reported to the VP of Compliance for quick resolution.

Tracking and Monitoring Inventory

It shall be the responsibility of PATRIOT CARE CORP's Inventory Manager to keep track of and monitor all inventory on the registered premises from the moment it is manufactured, produced or procured to the completion of its delivery. To minimize theft and diversion, all packaged inventory shall be affixed with a barcode that can be scanned and efficiently tracked using physical inventory software. The software uses a handheld scanner application to scan and track the unique serial numbers associated with each unit of inventory. If inventory is found to be missing, the Inventory Manager shall notify the Facility/Security Manager and the other Managers on site to begin an internal investigation to determine how, when and where the inventory was missing and if it was lost or stolen. The CCC and local law enforcement shall be notified as applicable.

PATRIOT CARE CORP's Management shall perform monthly inventory attestations and audits to ensure accuracy of all records as required by the CCC. In addition, PATRIOT CARE CORP shall conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory. The record of each inventory shall include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures and titles of the individuals who conducted the inventory.

PATRIOT CARE CORP shall conduct a monthly analysis of its adult-use POS equipment and sales data to determine that no software has been installed that could be used to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. The Company shall maintain records that it has performed the monthly analysis and produce it upon request to the CCC. If the Company 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:

- It shall immediately disclose the information to the CCC
- It shall cooperate with the CCC in any investigation regarding manipulation or alteration of sales data; and
- Take such other action directed by the CCC to comply with 935 CMR 500.105 and 935 CMR 501.105



Business records maintained in ADILAS™ database:

- Assets: Invoices and Deposits
- Monetary Transactions: Qualified Patients and Designated Caregivers sales, sales to adult-use consumers, Inventory Records and Controls
- Sales records including the quantity, form and cost of marijuana products, tracking of taxable sales for adult-use marijuana products as well as accessory sales. The Company will comply with 830 CMR 62C.25.1 with respect to record retention
- Sales settled by cash, debit card or other forms of payment allowed by our bank
- Patient Records: Personal information, CCC registration and expiration dates, transaction history
- Vendors: Quotes, Invoices, Receipts
- Business Records maintained in Intaact:
 - Assets: Accounts Receivables, Quotes, Invoices, Deposits
 - Liabilities: Accounts Payables, Expenses and Receipts, Manager/Employee Time clocks, Payroll
- Transactions: Qualified Patients and Designated Caregivers sales
- Vendors: Quotes, Invoices, Receipts
- Business Records are backed up electronically to Dropbox

All business records are systematically and automatically filed and electronically maintained for a period of seven (7) years from the date of creation to show a true, accurate, legible, and complete record of business activities conducted by PATRIOT CARE CORP.

The company's electronic records are continuously backed up and stored in Dropbox or Box or stored on ADILAS™, which stores all information through a server-based virtual data portal. Written operating procedures, including this Policies and Procedure manual is maintained on site, physically and electronically.

All inventory and cash will be kept in the safe or vault room overnight, and all cash must be in the safe except for the daily tills.

The company's electronic records are continuously backed up and stored in Dropbox (or comparable) or stored on ADILAS™, which stores all information through a server-based virtual data portal.

Each night, verification of sales, inventory controls, and patient records and dispensing will be completed in accordance with 935 CMR 500.110 and 935 CMR 501.110.

Certification of compliance and completion must be done at the end of each business day by the General Manager or Manager on duty. The GM or Manager on duty will record this information in the ADILAS™ system or electronically.



The safe will be opened in the morning upon the manager's arrival in order to count the previous night's receipts and count the employee's starting cash register totals to dispense the starting inventory for each employee.

During the business day, the manager on duty only opens the safe to complete specific tasks, such as replenishing inventory and making deposits.

Opening Procedures

Each morning prior to opening, the manager (or manager on duty) will print an inventory report from ADILAS™ and will physically count all the inventory on-site to match against the inventory report. If there are any discrepancies the Manager must then reconcile against the report detailing the closing inventory from the prior evening. Assuming there are no discrepancies, the Manager will place sufficient inventory in cabinets behind the sales counters to accommodate the expected sales for the day. In addition, the Manager will provide each POS station with a cash drawer to commence sales for the day. If sales exceed the supply of product initially placed in the cabinets behind the counters, the Manager will ensure that the cabinets are restocked throughout the day. If there were any unreconciled discrepancies against the inventory report, the Manager must report the unreconciled difference to either the VP Security, Director of the Market or the CEO. In addition to stocking the main sales floor POS stations, the Manager will determine whether the "Express Window" needs to be activated. Patients that know exactly what they want can minimize waiting times by filling out an order form upon arrival. They then wait in the waiting room until their order is ready for pickup at the designated Express Window.

Recording Sales

Medical Use Program – All sales transactions to registered patients and caregivers in the medical use program will be entered in the Company's ADILAS™ POS/Inventory software as well as in the Medical Use of Marijuana System which is the real-time system of record maintained by the CCC. Sales of marijuana and marijuana products to patients in the medical program are not taxable, though accessory sales are.

Adult-Use Program – All sales transactions to adult-use consumers will be maintained separately from medical use sales and entered into the Company's ADILAS™ POS/Inventory software, which will synchronize each night with the system that is approved by the CCC. The sales associate will ensure that sales tax is collected on all adult-use sales. The CCC and the MA Department of Revenue may audit and examine the point-of-sale system used by the Company to ensure compliance with Massachusetts tax laws and 935 CMR 500.000.

PATRIOT CARE CORP understands the importance of sales and accounting data and shall adopt separate accounting practices at the point-of-sale for marijuana and non-



marijuana sales, per 9935 CMR 500.140(6). Inventory of non-marijuana accessories is an integral part of the month-end close procedure in addition to taking inventory of marijuana. Per 935, CMR 502.140(5), PATRIOT CARE CORP shall maintain and provide to the Commission on a biannual basis accurate sales data collected during the six months immediately preceding this application to ensure an adequate supply of marijuana and MIPS.

Per 935 CMR 500.140(6), PATRIOT CARE CORP shall conduct a monthly analysis of equipment to determine that no software has been installed that could be utilized to manipulate or alter sales data. If PATRIOT CARE CORP determines software has been installed for the purpose of manipulation or alteration of sales data, it shall immediately disclose the information to the Commission, cooperate in any investigation and take any other action deemed necessary by the Commission to aid in the investigation.

Waste Records

When Marijuana Products or waste is disposed or handled, PATRIOT CARE CORP shall create and maintain an electronic record of the date, the type and quantity disposed or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two PATRIOT CARE CORP present during the disposal or other handling, with their signatures. This is further documented in the Storage of Marijuana section of this manual.

PATRIOT CARE CORP shall keep these records for three (3) years per CMR 500.105(12).



Separating recreational from medical operations

The safety of the patient and surrounding community begins as soon as someone enters the building. Patients and caregivers will enter the building using the front entrance of 21 Milk Street, through the building lobby. Patients and caregivers will enter the building using the same main entrance of 21 Milk Street that they currently use and that others entering the building upstairs will use. Adult-use consumers will enter the building using a separate entrance located at the corner of Milk Street and Hawley Street. Once checked at that door by our guard for suitable ID to ensure that they are at least 21 years of age, they will then be allowed into the secure vestibule for a second ID check by our receptionist. The building contains approximately 25,000 sf of office space and is home to several other businesses. In accordance with 105 CMR 725.110 and 935 CMR 500.110 and as described in the CCTV, Access Control and Intrusion System Design Layout. Patriot Care plans to secure the perimeters of the dispensary facility in such a way that patient/caregiver/adult-use consumer access to the facility itself is only possible through one of the two entrances noted above, which will be within the view of a professionally installed and maintained surveillance camera system and will be protected and secured by locks and alarms. Qualifying patients, primary caregivers and adult-use consumers will only be permitted into the building by dispensary personnel once it has been determined that it is safe to do so (i.e. after confirmation through the surveillance system and video intercom that no security threats have been observed).

Registered Patient Access: The intake process of determining a patient's status involves the verification of two forms of identification including the Marijuana for Medical use patient card issued by the CCC as well as a valid secondary form of state-issued identification. The MA patient card identification will be verified via the CCC MMJ portal in The Medical Use of Marijuana System. The Medical Use of Marijuana System, the CCC MMJ portal, serves as the system of record with respect to a patient's status in the program. The state's system is active, maintained by the CCC and updated in real time following each patient interaction. If a patient's active status has been revoked, the system will indicate such and our reception and security staff are trained to deny entry to the facility to that patient. In addition, Patriot Care's Adilas POS system tracks the date of expiration of each form of patient identification and will trigger a warning if either expiration date has been passed. If the patient is in our database and attempts to enter with expired identification, we will note that in an internal log note within the patient's record in Adilas. Any attempts to produce identifications that are not substantiated by the CCC will be declined. Reception and security personnel will retain for the CCC and law enforcement any discovered fake program or identification cards presented. Following the initial verification of status by the guard at the door, that individual will be allowed into a vestibule that is designed to be a "Man Trap" controlled by security/reception located behind a document transfer type window. At that point, secondary confirmation of patient/caregiver status will take place to include the following:



- Examination and confirmation as to the validity of the patients' CCC Registration Card electronically via the CCC on-line system.
- Examination of the patient's secondary form of identification as per 935 CMR 501.140 (2) photo confirmations, name that matches the name on the registration card, age, and expiration date (see above for acceptable forms of secondary identification).
- Confirmation of patient status and available medicine amount via CCC's Medical Use of Marijuana Online System ("MMJ Online System").
- Entry into Patriot Care's Patient Registration System and into the Patient queue to be called in the order in which they arrived.

Adult-Use Consumer Access: Every individual seeking to enter as an adult-use consumer will be required to present a valid government-issued photo identification. The guard at the adult-use entry will do an initial review of the ID using a UV light pen to spot security measures embedded in the ID. The receptionist will also have a device to validate the ID of the adult-use consumer. If there is any doubt about the validity of a card, or whether the person presenting the card is the same person as the one shown on the card, then that person will be denied entry. Following the initial verification of status by the guard at the door, the adult-use consumer will be allowed into a vestibule that is designed to be a "Man Trap" controlled by security/reception located behind a document transfer type window. At that point, secondary and tertiary confirmation of adult-use consumer eligibility will take place to include the following:

- The receptionist will verify the identification of each adult-use consumer to ensure that they are at least 21 years of age or older. If the receptionist has any doubt about the validity of a card, or whether the person presenting the card is the same person as the one shown on the card, then the receptionist can deny entry to that person.
- At the point of sale, the sales associate will also verify the identification of each adult-use consumer to ensure that they are at least 21 years of age or older. If the sales associate has any doubt about the validity of a card, or whether the person presenting the card is the same person as the one shown on the card, then the receptionist can deny entry to that person.
- Adult-use patients will be entered into a queue in Adilas to be called in the order in which they arrived.

As an additional measure, Patriot Care will post, in a location that is visible from the point of entry to the dispensary sales area, 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 for the Medical Program, 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 marijuana program registration card; and
- The sale or diversion of marijuana to minors is a crime in violation of Massachusetts General Laws.

Following entry into the sales area, patients, caregivers and adult-use consumers will enter a queue depending on their status. There will be a physical separation (demarcated by a temporary or semi-permanent physical barrier) between POS registers designated for medical patients, and those POS registers designated for adult-use consumers. A holder of a valid medical marijuana card issued by MA may use either line and shall not be limited only to the medical use line. A medical patient can use the adult-use line to purchase adult-use product subject to applicable regulations but cannot purchase medical product in that line. For patients, caregivers and adult-use consumers requiring confidential consultation, they will meet with a sales associate in the Patient Education room. No marijuana or marijuana products may be brought into this room.

Registered Patients Queue: Following the confirmation of patient status, the patient or caregiver will be entered into the electronic queue in the Adilas system for the registered patient queue inside the sales area, and allowed to enter the secured sales area. Once a dispensary agent is available at a POS station designated for medical patients, he/she will call the patient, who may be waiting in the patient queue inside the dispensary sales area. At the point of sale (POS) redundant checking of patient/caregiver status with CCC and identification confirmation will take place. Sale entry will be electronically entered into Patriot Care's database as well as the CCC database. Patient purchase limits will be based on the limits shown in the CCC database. All returning patients or primary caregivers will be required to show their registration card as well as their secondary form of identification to gain admittance to the dispensary facility every time they visit the facility.

Adult-Use Consumer Queue: Following verification of eligibility based on age, adult-use consumers will be entered into an electronic queue in the Adilas system for the adult-use consumer queue inside the sales area and allowed to enter the secured sales area. Once a dispensary agent is available at a POS station designated for adult-use consumers, he/she will call the adult-use consumer, who may be waiting in the adult-use queue inside the dispensary sales area. At the POS, the sales associate will again check the ID of the adult-use consumer to verify that they are at least 21 years of age or older. PATRIOT CARE CORP will refuse to sell marijuana to any consumer who is unable to produce a valid proof of identification and age. PATRIOT CARE CORP may refuse to sell marijuana products to a consumer if, in the opinion of the sales agent, based on the information available to the agent at that time, the consumer or the public would be placed at risk. Adult-use purchase limits will be no more than one ounce of marijuana or five grams of marijuana concentrate to a consumer per transaction.



PATRIOT CARE CORP will ensure there is a virtual separation as well as physical separation of Adult Use products and medical products. This will be accomplished by having dedicated, clearly labeled lockable opaque cabinets for Adult Use product as well Medical products.

Reporting Data and Adequate Supply

PATRIOT CARE CORP understands the importance of adequate supply to its medical patients.

PATRIOT CARE CORP will maintain and provide biannual basis accurate sales data collected during the six months for the purpose of ensuring an adequate supply of marijuana under 935 CMR 500.140(10) and 935 CMR 502.140.

Because PATRIOT CARE CORP has been established for greater than six months, PATRIOT CARE CORP will maintain a quantity and variety of marijuana for patients that meets the demand indicated by an analysis of sales data collected during the six preceding months, in accordance with 935 CMR 500.140(6) and 935 CMR 502.140. PATRIOT CARE CORP understands that retailers in operation for less than six months shall reserve 35% of the MTC's marijuana products.

Marijuana products reserved for patient supply shall reflect the actual types and strains of marijuana products documented during the previous six months. In the event that a substitution must be made, the substitution shall reflect the type and strain no longer available at the retailer as closely as possible, per 935 CMR 502.140.

Quarterly, PATRIOT CARE CORP shall submit to the Commission an inventory plan to reserve sufficient quantity and variety of marijuana registered for registered patients. On each occasion that the reserved patient supply is exhausted, and a reasonable substitution cannot be made, PATRIOT CARE CORP shall submit a report to the Commission.

PATRIOT CARE CORP shall perform audits of patient supply available at the establishment on a weekly basis and retain those records for a period of (6) six months, per 935 CMR 502.140.

PATRIOT CARE CORP understands it may transfer products reserved for medical-use to adult-use within a reasonable period of time prior to date of expiration provided that the product does not pose a risk to health or safety, per 935 CMR 502.140.



Qualifications and Training

In accordance with 935 CMR 500.105(2), 935 CMR 501.105(2) and 935 CMR 502.105(2), PATRIOT CARE CORP will ensure that all of its employees complete training prior to beginning their specific job functions. PATRIOT CARE CORP's Human Capital department will maintain a list of positions and their qualifications, per 935 CMR 500.105. A staffing plan and staffing records will be in compliance with 935 CMR 500.105(9)(d). Upon hire, the Human Capital department will enter all new agents into our required training program, inclusive of specific job duties, which must be satisfactorily completed before commencing work, per 935 CMR 500.105(2). This training shall be tailored to roles and responsibilities of the job function of each employee. At a minimum, staff shall receive eight hours of on-going training annually. Training programs will be designed, tracked and managed by each functional area in conjunction with the Human Capital department. Training will begin with internal trainers covering a wide assortment of subjects depending on the function to be performed by the new employee. These subjects may include but not be limited to diversity training, operations, security equipment and measures, product transportation, product storage, quarantine, inventory quality assurance measures, label verification, inventory management, recall, return and destruction policies, diversion prevention, sanitary and safety measures and recordkeeping. The training program will consist of one-on-one sessions and may include videos, workbooks and manuals. Trainees must take and pass subject matter examinations and obtain a certificate of completion.

Documentation shall be maintained in each employee's personnel file indicating all training, including training regarding privacy and confidentiality requirements and the signed statement of the employee indicating the date, time and place he or she received said training and the topics discussed, including the name and title of the presenters. On or after July 1, 2019, all employees involved in the handling and sale of marijuana for adult use at the time of licensure or renewal of licensure, as applicable, shall have attended and successfully completed Responsible Vendor Training within 90 days of being hired as detailed in 935 CMR 500.105 (2). Responsible Vendor Training Program documentation shall be maintained for four (4) years per 935 CMR 500.105(2).

Employee Security Training

PATRIOT CARE CORP, through the installation of significant electronic security measures have provided for physical security of staff and patients.



PATRIOT CARE CORP will begin the employee training process immediately and all employees will be evaluated for long-term suitability in the restricted access environment.

Training will include the comprehensive Employee Handbook and other relevant reading materials, lectures by qualified professionals, one-on-one and group hands-on training sessions, a mentoring program and taking quizzes to ensure the proper information is being retained. Operational training will be given to each new MTC/ME dispensary employee and must be completed before any staff member is permitted to begin working in the facility. A certificate of completion will be awarded upon successful completion of the program. Training and education will consist of the following modules:

- Operational training (including PATRIOT CARE CORP Policies and Procedures);
- Legal and compliance training, e.g. maintaining confidential information;
- Safety and security training;
- Situational Awareness;
- Responsible vendor training;
- Alarm system training;
- HIPAA Regulations;
- Basics of Marijuana education;
- Crisis preparation and prevention training including emergency procedures as per 935 CMR 500.105 (1)(j), 935 CMR 501.105 (1)(j) and 935 CMR 502.105(1);
- Counterfeit Currency Recognition;
- Fake Identification Recognition;
- Recognizing and Dealing with Difficult Individuals; and
- Incident Management Training and Reporting as per 935 CMR 500.110(9), 935 CMR 501.110 (9) and 935 CMR 502.110(7).

As a further measure to ensure compliance with CCC regulations, all employees entering the facility will be electronically logged in. At any time, employees shall be subject to a “bag-check” or some other form of inspection of personal property brought into the MTC/ME dispensary. Backpacks or other personal bags are disallowed. Our sophisticated closed-circuit television (CCTV) surveillance system shall be monitored by Security Personnel to ensure employee compliance with CCC regulations and organization policies during all operating hours. All issues shall be reported to the Facility/Security Manager. Any agent who diverts marijuana, engages in unsafe practices, or has been convicted or entered a guilty plea for a felony charge of distribution of a drug to a minor will be immediately dismissed, as per company policy and 935 CMR 500.105(1).

PATRIOT CARE CORP will utilize a “Lessons Learned” approach toward staff training and develop additional curriculum as new experiences and changing



approaches to various security concerns are realized in Massachusetts or via our affiliates in other states or jurisdictions.

Personnel Records

PATRIOT CARE CORP maintains the following personnel records:

- Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions.
- A personnel record for each marijuana establishment agent. Such records shall be

maintained for at least 12 months after termination of the individual's affiliation with PATRIOT CARE CORP and shall include, at a minimum, the following:

- All materials submitted to the commission pursuant to 935 CMR 500.030(2);
- 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; and
- Notice of completed responsible vendor and eight-hour related duty training.
- A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
- Personnel policies and procedures; and
- All background check reports obtained in accordance with M.G.L c. 6 § 172, 935 CMR 500.029, 935 CMR 500.030, and 803 CMR 2.00: Criminal Offender Record Information (CORI)

SAMPLE JOB DESCRIPTIONS

PATRIOT CARE CORP is providing a sample list of job descriptions with minimum qualifications and responsibilities. These are constantly evaluated to ensure compliance with the Commission and company policy.



SALES ASSOCIATE

Reports to: General Manager

Position Overview:

Under general supervision, Sales Associates provide guidance and education to each patient with medical marijuana needs. Associates assist every patient to ensure the patient is receiving the correct medication that will best benefit the patient's specific illness and medical condition.

Major Areas of Responsibility include:

- Ensures all intake forms and other paperwork is properly completed and filed correctly, then enters all appropriate information in ADILAS for future reference.
- Confirms patient purchase limits prior to admission into the consultation area and informs the appropriate pharmacist of such limits.
- Provide Exceptional Customer Care by promoting and maintaining positive customer relations.
- Respond to calls or emails from customers requesting product, training, and general information.
- Management of patient records through the use of an MMJ database.
- Maintenance and update of databases as needed.
- Fulfillment of customer orders.
- Responsible for the sales and promotion of all Patriot Care products.
- Build and maintain a high level of integrity and trust for specific products.

Minimum Qualifications (Skills, Knowledge & Abilities):

- Must be at least 21 years of age.
- Two years of direct customer service experience required.
- Retail experience a strong plus.
- Experience with Point-of-Sales systems.
- Understanding of and experience with Windows Operating System and Microsoft Outlook.

Travel %: 0

FLSA status: Non-exempt



GENERAL MANAGER

Reports to: Market Director

Position Overview:

The General Manager (GM) is responsible for day-to-day operations of the dispensing facility. They oversee all activities related to compliance, operations, and patient service delivery of the dispensing facility to include patient identification and registration, record retention, product tracking, inventory control, sales and excellent patient experience delivery. The GM leads the dispensary team, manages the P&L, fosters patient satisfaction, and ensures compliance with all state and local regulations.

Major Areas of Responsibility include:

- Directly supervising the activity within the dispensary to include dispensary staff hiring, training, performance management, and retaining top quality staff.
- Ensuring compliance with all State and local medical marijuana regulations.
- Providing management and leadership in the dispensary to include monitoring all point of sale transactions, managing patient and inventory specific logs as required by regulations, monitoring the receipt, storage and auditing of all inventory, ordering new inventory and supplies, maintaining accurate records, ensuring the security and confidentiality of all patient information, as well as overall compliance with HIPAA.
- Resolving all inventory discrepancies and patient-staff conflicts.
- Establishing and executing plans to detect, identify and prevent dispensing errors related to product packaging, labeling, and dispensing.
- Managing and implementing policies and procedures for any retesting of returned approved medical marijuana products, storage and/or disposal of such products, and meeting reporting requirements for adverse events and product recall.
- Implementing and maintaining security systems for tracking, record keeping, record retention and surveillance related to all product at every stage of storage, delivery, transportation, and distribution.
- Resolving employee concerns and performance or behavioral issues with the support of Human Capital as needed.
- Maintaining the facility conducive to a positive patient experience and satisfactory employee work environment.
- Providing company-wide communication to staff and managing change as needed.
- Ensuring employee safety, wellness, and health & welfare.



Minimum Qualifications (Skills, Knowledge & Abilities):

- All applicants must be at least 21 years of age.
- 3-5 years' experience managing a retail operation
- Bachelor's Degree preferred
- Must be passionate about handling all aspects of a retail operation to include staffing schedules, compliance, inventory control, purchasing, theft prevention and product diversion.
- Demonstrated management experience in a high growth environment are preferred.
- Solid business acumen, management reporting, and problem-solving skills.
- Exceptional interpersonal skills such as listening, coaching and training.
- Strong leadership, conflict management, project management and time management skills.
- Excellent written, verbal and non-verbal communication skills.
- Ability to exercise sound judgment and make decisions in a manner consistent with confident leadership.



PATIENT INTAKE COORDINATOR

Reports to: General Manager

Position Overview:

The Patient Intake Coordinator is responsible for greeting patients, setting up the patient record in our system and for providing an exceptional patient experience. Under general supervision, enters data from various source documents into computer system for storage, processing and data management purposes. Verifies the accuracy and veracity of the status of all qualifying patients and designated caregivers who come to our dispensary using proper identification and verification protocol. The Patient Intake Coordinator maintains a visitor log limiting access to the dispensing facility. Answer inquiries independently in accordance with policy.

Major Areas of Responsibility include:

- The Patient Registration Representative must ensure that visitors are escorted, monitored and that authorized identification badges are issued in compliance with State law.
- Collects and manages informational documents to support data integrity.
- This position ensures all intake forms and other paperwork is properly completed and filed correctly, then enters all appropriate information into the POS.
- The Patient Intake Receptionist confirms patient purchase limits prior to admission into the consultation area and informs the appropriate pharmacist of such limits.
- This position manages patient flow into the consultation area ensuring no more than one patient is admitted per pharmacist on duty and completes other administrative tasks at the dispensary.
- Ensure that transactions are complete, timely, and accurate and conform to internal policies and external regulations.
- Audits data entry transactions to ensure alignment with accounting systems. Alerts management of sourced discrepancies.

Minimum Qualifications (Skills, Knowledge & Abilities):

- All applicants must be at least 21 years of age.
- Demonstrated advanced ability in word processing and spreadsheet software programs including Microsoft Office products, accounting software (QuickBooks preferred), e-mail, etc.
- Proficient in data entry and 10-key.
- Ability to deal with confidential information such as financial records and product inventory reports.
- Ability to work independently and solve routine problems.
- Knowledge of basic accounting principles and practices.
- Skill in using computer and application software for financial transactions.
- Skill in mathematical computations used in accounting.
- Ability to communicate effectively, both orally and in writing.
- Ability to establish and maintain effective working relationships with those contacted in the course of work.
- Ability to prepare written reports and correspondence, and presentations as required.
- Ability to exercise sound judgment and make decisions in a manner consistent with confident leadership.
- Ability to organize and prioritize work.
- Must be at least 21 years of age.
- Available to work weekends and flexible work schedule.

Travel %: 0

FLSA status: Non-exempt



SUPERVISOR, RETAIL OPERATIONS

Reports to: General Manager; Manager, Retail Ops or Area GM (the “Manager”)

Position Overview:

The Supervisor, Retail Operations (the “Supervisor”) is responsible for assisting the Manager with interfacing, consulting with qualified patient and caregiver and administering approved medical marijuana products. The Supervisor oversees all activities related to the operation of the Dispensing Facility to include patient identification and registration, record retention, product tracking and inventory control as directed by the Manager.

Major Areas of Responsibility include:

- The Supervisor, Retail Operations ensures compliance with all Compassionate Use of Medical Cannabis Pilot Program rules and regulations governing the Act, and directly supervises the activity within the dispensary to include dispensary staff training and education in the absence of the Manager and as directed.
- The Supervisor, Retail Operations provides management and leadership in the Dispensing Facility to include monitoring all point of sale transactions.
- The Supervisor, Retail Operations manages patient specific logs as required, the receipt, storage and auditing of all inventory, and is responsible for ordering new inventory and supplies, maintaining accurate records using BioTrackTHC, the Dispensing Facility’s inventory tracking software program.
- As the responsible party at the Dispensing Facility, this position resolves all inventory discrepancies and patient-staff conflicts.
- The Supervisor, Retail Operations is responsible for the development of the Dispensing Facility’s privacy policies and procedures, the security and confidentiality of all patient information, as well as overall compliance with HIPAA.
- This position acts as a liaison internally between all staff, dispensary management team and the Manager, and externally between the Dispensing Facility and law enforcement, Commissioner of Health, and the local community.
- Directs and monitors department managers to accomplish goals of the plan, consistent with established and safety procedures.
- Establishes methods to follows the operating plan in compliance with the Compassionate Use of Medical Cannabis Pilot Program, maintaining records required by public health law and ensures quality assurance plans, including but limited to plans to detect, identify and prevent dispensing errors related to product packaging and labeling.
- Manages and implements policies and procedures for any retesting of returned approved medical marijuana products, storage and disposal and meeting reporting requirements for adverse events and product recall.
- This position is responsible for assisting with implementing and maintaining security systems for tracking, record keeping, record retention and surveillance related to all product at every stage of, storage, delivery, transporting, and distribution.



- Development of an employee-oriented company culture that emphasizes quality, continuous improvement, teamwork, and high performance.
- Implement HR policies and programs in support of company initiatives. Direct all compliance efforts for the company to minimize risk.
- Ensure job descriptions for all positions are accurate and current.
- Conduct investigations; respond to unemployment claims, EEOC, DOL, and/or employee relation issues such as employee complaints, harassment allegations, and civic rights complaints. Settle grievances in coordination with Senior Counsel.
- Conduct exit interviews analyze data and make recommendations to the management team for corrective action and continuous improvement.
- Create organizational development and employee training programs.
- Conduct performance reviews with department managers & monitor employee productivity, attitudes, and performance results.
- Implement HR related software systems in collaboration with IT Partners.
- Recruit and retain top quality staff for each department; conduct interviews. Manage talent acquisition and workforce management plan.
- Build a quality assurance program that is tied to performance review process.
- Develop progressive and proactive compensation and benefit programs to provide motivation, incentives and rewards for effective performance. Manage leave administration practices.
- Maintain excellent facilities conducive to enhancing employee productivity.
- Provide company-wide communication & manage change.
- Ensure employee safety, wellness, and health & welfare.

Minimum Qualifications (Skills, Knowledge & Abilities):

- All applicants must be at least 21 years of age.
- Possession of a bachelor's degree or 3 years of experience at a management administrative level with an emphasis on employee relations and talent management.
- Experience must include hands-on responsibility for the full scope of human resources activities, both operations and analysis.
- Must be passionate about handling all aspects of a retail operation to include staffing schedules, compliance, inventory control, purchasing and theft prevention and product diversion.
- Demonstrated management and leadership skills in a high growth environment are preferred.
- Operations management to include production oversight and accountability.
- Excellent and effective consulting skills.
- Strong conflict management skills.
- Strong interpersonal and negotiation skills.
- Solid business acumen, management reporting, and problem-solving skills.
- Exceptional interpersonal skills, including listening, coaching & training.
- Strong leadership, project management & time management skills.
- Excellent written, verbal and non-verbal communication skills.
- Ability to develop strong relationships and experience working with senior level executives.



- Ability to prepare written reports and correspondence, and presentations to senior leadership as required.
- Ability to manage and administer a broad range of tasks including resolving complaints counseling managers and employees on the interpretation of policies, procedures and programs.
- Ability to objectively coach employees and management through complex, difficult and emotional issues.
- Ability to build and maintain positive relationships in order to gain support and achieve results both internally and externally.
- Ability to exercise sound judgment and make decisions in a manner consistent with confident leadership.
- Ability to organize and prioritize work.

Travel %: 0

FLSA status: Non-exempt



Quality Control and Testing

Product Quality Control, Including Destruction

General Quality Control

All marijuana product that arrives at the dispensing facility is pre-packaged. PATRIOT CARE CORP will ensure that all agents whose job includes contact with marijuana is subject to the requirements for food handlers specified in 105 CMR 300.000. PATRIOT CARE CORP agents, especially when in direct contact with marijuana, shall conform to sanitary practices while on duty, including maintaining adequate personal cleanliness and washing hands appropriately per 935 CMR 500.105(3). In order to ensure compliance with 935 CMR 500.105(3), PATRIOT CARE CORP will ensure that hand-washing facilities are located in the facility for employees to wash and sanitize their hands.

In order to maintain order and cleanliness, PATRIOT CARE CORP will ensure sufficient space for placement of equipment and storage of materials and floors, walls, and ceilings are constructed in a manner that they may be adequately kept clean and in good repair per 935 CMR 500.105(3). PATRIOT CARE CORP will ensure cleaning protocols are in place so that all contact surfaces are maintained, cleaned and sanitized as frequently as necessary to protect against contamination. Furthermore, all toxic items will be identified, held and stored in a manner that protects against contamination of marijuana. Water supply at the facility will also be sufficient and plumbing shall be of adequate size and design to carry sufficient quantities of water to required locations at PATRIOT CARE CORP. Employees will have access to adequate, readily accessible toilet facilities at all times.

Per 935 CMR 500.140(9) and 935 CMR 500.160(2), no marijuana will be sold at the facility that is not capable of being tested by an Independent Testing Laboratory. PATRIOT CARE CORP shall notify the commission within 72 hours of any laboratory testing results indicating contamination if contamination can not be remediated and disposal of the production batch is necessary.

Destruction of Unusable Product/Contaminated Product

PATRIOT CARE CORP shall immediately destroy or dispose of unusable marijuana products and by-products, as well as product that fails to meet the quality controls set forth in 935 CMR 500.160, 935 CMR 501.160 and 935 CMR 502.160. These products will be disposed of by grinding the waste and combining it with an inert compound or solid waste (using no less than a ratio of 10% marijuana waste to 90% inert material) and disposing of it in a segregated dumpster that will be regularly picked up by that will transport it to a solid waste facility that holds a valid permit issued by the DEP as required by 935 CMR 500.105



(12), 935 CMR 501.105(12) and 935 CMR 502.105(12). PATRIOT CARE CORP will ensure that litter and waste is properly removed so as to minimize the development of odor and the potential for waste attracting and harboring pests, per 935 CMR 500.105(12). Prior to destruction all unused or surplus marijuana products and/or by-products shall be weighed and documented both in logs and our inventory control system.

PATRIOT CARE CORP, in accordance with State regulations defines “unusable marijuana” as product that is determined to be non-extractable plant material waste, soil, root systems, stalks, immature or culled clones deemed unviable for bloom, and may include any harvested or unharvested biomass both processed and unprocessed, which is possessed by PATRIOT CARE CORP, including, any Marijuana that has spoiled or is deemed unusable, and any product that has or appears to have been tampered with, along with MIPs.

PATRIOT CARE CORP will segregate any product that needs to be destroyed. Storage and transportation of finished products at PATRIOT CARE CORP shall be under conditions that will protect them against physical, chemical, and microbial contamination as set forth by 935 CMR 500.105(3).

Segregation and Destruction of Unsafe Product, Including Recalls

In accordance with 935 CMR 500.130 (5)(b) and 935 CMR 501.130(5)(b) PATRIOT CARE CORP has created the following procedure to accommodate any self-initiated recalls, or mandatory recalls deemed necessary by the CCC, for all products produced. If at any time a product recall is necessary the Compliance and Reporting Manager will notify the facility managers at any facility that have in inventory, or have had in inventory, any of the product in question. Using our inventory control system, the facilities will generate a list of all of the product still in inventory and all of the product that has been sold and to whom it was sold. All product currently in inventory at the MTC/ME will be collected and removed from inventory and put on a transfer invoice back to the Cultivation Center for disposal as laid out by our internal standards for Product Disposal following 935 CMR 500.105(12), 935 CMR 501.105(12) and 935 CMR 502.105(12).

All qualified registered patients and caregivers and adult-use consumers who have purchased the product will be contacted immediately via email, post, or a phone call to inform them of the recall and to provide them with instructions for returning the product to the MTC from which they purchased it. All of this product will be segregated and disposed of in a clearly marked receptacle dedicated to the destruction and disposal of marijuana or marijuana products that is deemed outdated, damaged, deteriorated, mislabeled, or contaminated as outlined in 935 CMR 500.130 (5)(c) and 935 CMR 501.130(5)(c). Accordingly, these products will be adjusted from inventory and the reason, method, agent responsible, and date of the destruction will all be logged in the company's inventory control system. Additionally, all patients, caregivers and adult-use consumers



will receive a full refund for any product that is recalled and returned to the MTC/ME, or a credit for any product that has been used or destroyed by the registered patient, caregiver or adult-use consumer themselves.

Dated, Damaged, Returned and/or Contaminated Products

All outdated (e.g. past expiration date), returned, damaged, deteriorated, mislabeled or contaminated marijuana and marijuana products will be segregated and returned to the originating cultivation/manufacturing center to be destroyed. All such product will be returned to the cultivation/manufacturing center following the transportation protocols noted in the previous section of this document. The cultivation/manufacturing center will destroy the product using a dedicated plant chipper and then mixing the fine plant material with inert material and placing in a dedicated receptacle. This material will then be removed by an accredited waste removal agency at regular intervals. Any material handled in this way will be recorded in the plant waste log and kept on file both physically and digitally. The plant waste log will contain all relevant information including, Date, Strain name, plant PO #, Reason for removal, and agent who performed the removal process.



Personnel Policies Including Background Checks

PATRIOT CARE CORP's Human Capital department will maintain a list of positions and their qualifications, per 935 CMR 500.105. A staffing plan and staffing records will be in compliance with 935 CMR 500.105(9)(d). Upon hire, the Human Capital department will enter all new agents into our required training program, inclusive of specific job duties, which must be satisfactorily completed before commencing work, per 935 CMR 500.105(2).

Any agent who diverts marijuana, engages in unsafe practices, or has been convicted or entered a guilty plea for a felony charge of distribution of a drug to a minor will be immediately dismissed, as per company policy and 935 CMR 500.105(1).

SAMPLE JOB DESCRIPTIONS

PATRIOT CARE CORP is providing a sample list of job descriptions with minimum qualifications and responsibilities. These are constantly evaluated to ensure compliance with the Commission and company policy.



SALES ASSOCIATE

Reports to: General Manager

Position Overview:

Under general supervision, Sales Associates provide guidance and education to each patient with medical marijuana needs. Associates assist every patient to ensure the patient is receiving the correct medication that will best benefit the patient's specific illness and medical condition.

Major Areas of Responsibility include:

- Ensures all intake forms and other paperwork is properly completed and filed correctly, then enters all appropriate information in ADILAS for future reference.
- Confirms patient purchase limits prior to admission into the consultation area and informs the appropriate pharmacist of such limits.
- Provide Exceptional Customer Care by promoting and maintaining positive customer relations.
- Respond to calls or emails from customers requesting product, training, and general information.
- Management of patient records through the use of an MMJ database.
- Maintenance and update of databases as needed.
- Fulfillment of customer orders.
- Responsible for the sales and promotion of all Patriot Care products.
- Build and maintain a high level of integrity and trust for specific products.

Minimum Qualifications (Skills, Knowledge & Abilities):

- Must be at least 21 years of age.
- Two years of direct customer service experience required.
- Retail experience a strong plus.
- Experience with Point-of-Sales systems.
- Understanding of and experience with Windows Operating System and Microsoft Outlook.

Travel %: 0

FLSA status: Non-exempt



GENERAL MANAGER

Reports to: Market Director

Position Overview:

The General Manager (GM) is responsible for day-to-day operations of the dispensing facility. They oversee all activities related to compliance, operations, and patient service delivery of the dispensing facility to include patient identification and registration, record retention, product tracking, inventory control, sales and excellent patient experience delivery. The GM leads the dispensary team, manages the P&L, fosters patient satisfaction, and ensures compliance with all state and local regulations.

Major Areas of Responsibility include:

- Directly supervising the activity within the dispensary to include dispensary staff hiring, training, performance management, and retaining top quality staff.
- Ensuring compliance with all State and local medical marijuana regulations.
- Providing management and leadership in the dispensary to include monitoring all point of sale transactions, managing patient and inventory specific logs as required by regulations, monitoring the receipt, storage and auditing of all inventory, ordering new inventory and supplies, maintaining accurate records, ensuring the security and confidentiality of all patient information, as well as overall compliance with HIPAA.
- Resolving all inventory discrepancies and patient-staff conflicts.
- Establishing and executing plans to detect, identify and prevent dispensing errors related to product packaging, labeling, and dispensing.
- Managing and implementing policies and procedures for any retesting of returned approved medical marijuana products, storage and/or disposal of such products, and meeting reporting requirements for adverse events and product recall.
- Implementing and maintaining security systems for tracking, record keeping, record retention and surveillance related to all product at every stage of storage, delivery, transportation, and distribution.
- Resolving employee concerns and performance or behavioral issues with the support of Human Capital as needed.
- Maintaining the facility conducive to a positive patient experience and satisfactory employee work environment.
- Providing company-wide communication to staff and managing change as needed.
- Ensuring employee safety, wellness, and health & welfare.



Minimum Qualifications (Skills, Knowledge & Abilities):

- All applicants must be at least 21 years of age.
- 3-5 years' experience managing a retail operation
- Bachelor's Degree preferred
- Must be passionate about handling all aspects of a retail operation to include staffing schedules, compliance, inventory control, purchasing, theft prevention and product diversion.
- Demonstrated management experience in a high growth environment are preferred.
- Solid business acumen, management reporting, and problem-solving skills.
- Exceptional interpersonal skills such as listening, coaching and training.
- Strong leadership, conflict management, project management and time management skills.
- Excellent written, verbal and non-verbal communication skills.
- Ability to exercise sound judgment and make decisions in a manner consistent with confident leadership.



PATIENT INTAKE COORDINATOR

Reports to: General Manager

Position Overview:

The Patient Intake Coordinator is responsible for greeting patients, setting up the patient record in our system and for providing an exceptional patient experience. Under general supervision, enters data from various source documents into computer system for storage, processing and data management purposes. Verifies the accuracy and veracity of the status of all qualifying patients and designated caregivers who come to our dispensary using proper identification and verification protocol. The Patient Intake Coordinator maintains a visitor log limiting access to the dispensing facility. Answer inquiries independently in accordance with policy.

Major Areas of Responsibility include:

- The Patient Registration Representative must ensure that visitors are escorted, monitored and that authorized identification badges are issued in compliance with State law.
- Collects and manages informational documents to support data integrity.
- This position ensures all intake forms and other paperwork is properly completed and filed correctly, then enters all appropriate information into the POS.
- The Patient Intake Receptionist confirms patient purchase limits prior to admission into the consultation area and informs the appropriate pharmacist of such limits.
- This position manages patient flow into the consultation area ensuring no more than one patient is admitted per pharmacist on duty and completes other administrative tasks at the dispensary.
- Ensure that transactions are complete, timely, and accurate and conform to internal policies and external regulations.
- Audits data entry transactions to ensure alignment with accounting systems. Alerts management of sourced discrepancies.

Minimum Qualifications (Skills, Knowledge & Abilities):

- All applicants must be at least 21 years of age.
- Demonstrated advanced ability in word processing and spreadsheet software programs including Microsoft Office products, accounting software (QuickBooks preferred), e-mail, etc.
- Proficient in data entry and 10-key.
- Ability to deal with confidential information such as financial records and product inventory reports.
- Ability to work independently and solve routine problems.
- Knowledge of basic accounting principles and practices.
- Skill in using computer and application software for financial transactions.
- Skill in mathematical computations used in accounting.
- Ability to communicate effectively, both orally and in writing.
- Ability to establish and maintain effective working relationships with those contacted in the course of work.
- Ability to prepare written reports and correspondence, and presentations as required.
- Ability to exercise sound judgment and make decisions in a manner consistent with confident leadership.
- Ability to organize and prioritize work.
- Must be at least 21 years of age.
- Available to work weekends and flexible work schedule.

Travel %: 0

FLSA status: Non-exempt



SUPERVISOR, RETAIL OPERATIONS

Reports to: General Manager; Manager, Retail Ops or Area GM (the “Manager”)

Position Overview:

The Supervisor, Retail Operations (the “Supervisor”) is responsible for assisting the Manager with interfacing, consulting with qualified patient and caregiver and administering approved medical marijuana products. The Supervisor oversees all activities related to the operation of the Dispensing Facility to include patient identification and registration, record retention, product tracking and inventory control as directed by the Manager.

Major Areas of Responsibility include:

- The Supervisor, Retail Operations ensures compliance with all Compassionate Use of Medical Cannabis Pilot Program rules and regulations governing the Act, and directly supervises the activity within the dispensary to include dispensary staff training and education in the absence of the Manager and as directed.
- The Supervisor, Retail Operations provides management and leadership in the Dispensing Facility to include monitoring all point of sale transactions.
- The Supervisor, Retail Operations manages patient specific logs as required, the receipt, storage and auditing of all inventory, and is responsible for ordering new inventory and supplies, maintaining accurate records using BioTrackTHC, the Dispensing Facility’s inventory tracking software program.
- As the responsible party at the Dispensing Facility, this position resolves all inventory discrepancies and patient-staff conflicts.
- The Supervisor, Retail Operations is responsible for the development of the Dispensing Facility’s privacy policies and procedures, the security and confidentiality of all patient information, as well as overall compliance with HIPAA.
- This position acts as a liaison internally between all staff, dispensary management team and the Manager, and externally between the Dispensing Facility and law enforcement, Commissioner of Health, and the local community.
- Directs and monitors department managers to accomplish goals of the plan, consistent with established and safety procedures.
- Establishes methods to follows the operating plan in compliance with the Compassionate Use of Medical Cannabis Pilot Program, maintaining records required by public health law and ensures quality assurance plans, including but limited to plans to detect, identify and prevent dispensing errors related to product packaging and labeling.
- Manages and implements policies and procedures for any retesting of returned approved medical marijuana products, storage and disposal and meeting reporting requirements for adverse events and product recall.
- This position is responsible for assisting with implementing and maintaining security systems for tracking, record keeping, record retention and surveillance related to all product at every stage of, storage, delivery, transporting, and distribution.



- Development of an employee-oriented company culture that emphasizes quality, continuous improvement, teamwork, and high performance.
- Implement HR policies and programs in support of company initiatives. Direct all compliance efforts for the company to minimize risk.
- Ensure job descriptions for all positions are accurate and current.
- Conduct investigations; respond to unemployment claims, EEOC, DOL, and/or employee relation issues such as employee complaints, harassment allegations, and civic rights complaints. Settle grievances in coordination with Senior Counsel.
- Conduct exit interviews analyze data and make recommendations to the management team for corrective action and continuous improvement.
- Create organizational development and employee training programs.
- Conduct performance reviews with department managers & monitor employee productivity, attitudes, and performance results.
- Implement HR related software systems in collaboration with IT Partners.
- Recruit and retain top quality staff for each department; conduct interviews. Manage talent acquisition and workforce management plan.
- Build a quality assurance program that is tied to performance review process.
- Develop progressive and proactive compensation and benefit programs to provide motivation, incentives and rewards for effective performance. Manage leave administration practices.
- Maintain excellent facilities conducive to enhancing employee productivity.
- Provide company-wide communication & manage change.
- Ensure employee safety, wellness, and health & welfare.

Minimum Qualifications (Skills, Knowledge & Abilities):

- All applicants must be at least 21 years of age.
- Possession of a bachelor's degree or 3 years of experience at a management administrative level with an emphasis on employee relations and talent management.
- Experience must include hands-on responsibility for the full scope of human resources activities, both operations and analysis.
- Must be passionate about handling all aspects of a retail operation to include staffing schedules, compliance, inventory control, purchasing and theft prevention and product diversion.
- Demonstrated management and leadership skills in a high growth environment are preferred.
- Operations management to include production oversight and accountability.
- Excellent and effective consulting skills.
- Strong conflict management skills.
- Strong interpersonal and negotiation skills.
- Solid business acumen, management reporting, and problem-solving skills.
- Exceptional interpersonal skills, including listening, coaching & training.
- Strong leadership, project management & time management skills.
- Excellent written, verbal and non-verbal communication skills.
- Ability to develop strong relationships and experience working with senior level executives.



- Ability to prepare written reports and correspondence, and presentations to senior leadership as required.
- Ability to manage and administer a broad range of tasks including resolving complaints counseling managers and employees on the interpretation of policies, procedures and programs.
- Ability to objectively coach employees and management through complex, difficult and emotional issues.
- Ability to build and maintain positive relationships in order to gain support and achieve results both internally and externally.
- Ability to exercise sound judgment and make decisions in a manner consistent with confident leadership.
- Ability to organize and prioritize work.

Travel %: 0

FLSA status: Non-exempt

Personnel Policies and Procedures Manual

Human Capital Policy Statement

This manual is intended to provide a general understanding of our basic Human Capital policies and procedures for smooth and effective operations. Managers and Supervisors are expected to be familiar with Company policies, related to employment practices.

PATRIOT CARE CORP Human Capital Policies cannot anticipate every situation or answer every question about employment. Policies are not an employment contract and are not intended to create contractual obligations of any kind. Neither the employee nor the company is bound to continue the employment relationship if either chooses, at its will, to end the relationship at any time.

This Personnel Policy & Procedures Manual is distributed to employees in supervisory positions. Please note that the manual is assigned to the position, not the incumbent of the position, so it should remain with the position if the incumbent moves on. All copies of the manual are, and shall remain, the property of PATRIOT CARE CORP.

In order to retain necessary flexibility in the administration of policies and procedures, the company reserves the right to change, revise, or eliminate any of the policies and/or benefits described in this handbook at any time.



BUSINESS CONDUCT

Code of Conduct

This Employee Code of Ethics and Conduct ("Code") details PATRIOT CARE CORP's policies for employees. PATRIOT CARE CORP is committed to a quality business and reputation that values integrity, respect and truthfulness, and a strong commitment to the highest ethical standards. These principles apply to employee interactions with co-workers, the Company, Patients and caregivers, government and regulatory agencies and the general public. This Code applies to PATRIOT CARE CORP, its Board of Directors, [collectively "employees"]. PATRIOT CARE CORP employees must be familiar with this Code and adhere to its guidelines. As members of the leadership team, there is an expectation that Managers will serve as an example of our guiding principles.

This Code is not a comprehensive guide of all ethical issues that employees may face, but merely highlights specific problems. In dealing with ethical problems not detailed in this Code, employees are expected to use common sense and their best moral judgment. If an employee has ethical questions, please contact the Director of Human Capital. This policy may be modified or updated at any time.

PATRIOT CARE CORP has a policy to observe all laws, rules, and regulations of government agencies and authorities. This specifically includes requirements under the Massachusetts Humanitarian Medical Use of Marijuana, as amended, Chapter 55 of the Acts of 2017, (the "2017 Marijuana Act") the policies of the Department of Public Health and the Cannabis Control Commission, as well as other state and federal laws. If federal, state or local law exists that is either contradictory or stricter than this policy, employees must apply the law.

Non-Disclosure Agreement

Upon acceptance of at-will employment, all employees are required as a condition of employment to sign a Nondisclosure Agreement. Managers and supervisors are responsible for understanding the purpose of the nondisclosure and its contents. A summary shall be provided in this Policy & Procedures Manual.

The Nondisclosure & Representation Agreement is entered into by and the between and PATRIOT CARE CORP for the purpose of preventing the unauthorized disclosure of Confidential Information as defined below. The parties agree to enter into a confidential relationship with respect to the disclosure of certain proprietary and confidential information ("Confidential Information").



1. Outside Business Activities. The Employee shall devote his or her full business time, attention and energies and expend his or her best efforts to the business of the Company, subject to reasonable absences for vacation and illness. During Employee's employment with the Company, he or she shall not be engaged (whether or not during normal business hours) in any other business or professional activity, whether or not such activity is competitive with the business of the Company, pursued for gain, profit or other pecuniary advantage, except as may be permitted by the Company in writing. Notwithstanding the foregoing sentence, the Employee shall have the right to participate in charitable and community organizations, provided any such activities do not interfere with or compromise his full and complete performance of this Agreement.
2. Company Policies. The Employee agrees to adhere to and abide by the Company's Employee Handbook, and its policies and procedures, as implemented and amended from time to time.
3. Representations. The Employee represents and warrants to the Company that he or she is not now or at any time prior to the Effective Date under any obligation of a contractual or other nature to any person, firm or corporation which is inconsistent or in conflict with this Agreement or which would prevent, limit or impair, in any way, the execution of this Agreement or the performance by his or her obligations hereunder.
4. Indemnification. In the event that the Employee is sued or made a party or threatened to be sued or made a party to any action, suit, or proceeding, whether civil, criminal, administrative or investigative relating to, concerning or arising out of the Employee's role as a director or officer of the Company and relating to or concerning conduct of the Employee conducted in furtherance of the Company's business and/or at the direction of the Company, the Company shall indemnify the Employee, to the extent permitted under applicable law, against any liabilities, costs, claims and expenses, including all costs and expenses incurred in defense of any such proceeding (including attorneys' fees). This indemnification provision shall **not** apply to any proceeding between the Employee and the Company or between the Employee and any other director, officer, member, shareholder, manager or employee of the Company.
5. Notification. The Employee agrees to provide the Company with written notice prior to terminating his/her employment with the Company, regardless of the basis for such termination (the "Notice Period"). The Company reserves the right to waive the notice requirement in whole or in part and to terminate employment with or without prior notice.
6. Confidential Information. The Employee understands and acknowledges that during the Employment Term, he or she will have access to and learn about Confidential Information, as defined below.

6.1 Definition.

- (a) For purposes of this Agreement, "**Confidential Information**" includes, but is not limited to, all information not generally known to the public, in spoken,



printed, electronic or any other form or medium, relating directly or indirectly to: business processes, practices, methods, policies, plans, publications, documents, research, operations, services, strategies, techniques, agreements, contracts, terms of agreements, transactions, potential transactions, negotiations, pending negotiations, know-how, trade secrets, computer programs, software and applications, databases, manuals, records, articles, systems, material, sources of material and inventory, supplier information, vendor information, financial information, results, accounting information, accounting records, legal information, marketing information, advertising information, pricing information, credit information, design information, payroll information, staffing information, personnel information, employee lists, internal controls, security procedures, market studies, sales information, and patient information of the Company or its businesses or any existing or prospective customer, supplier, investor or other associated third party, or of any other person or entity that has entrusted information to the Company in confidence.

- (b) The Employee understands that the above list is not exhaustive, and that Confidential Information also includes other information that is marked or otherwise identified as confidential or proprietary, or that would otherwise appear to a reasonable person to be confidential or proprietary in the context and circumstances in which the information is known or used.
- (c) The Employee understands that Confidential Information includes information developed by him or her in the course of his or her employment by the Company as if the Company furnished the same Confidential Information to the Employee in the first instance.

6.2 Company Creation and Use of Confidential Information.

The Employee understands and acknowledges that the Company has invested, and continues to invest, substantial time, money and specialized knowledge into developing its resources, creating a customer base, generating customer and potential customer lists, training its employees, and improving its offerings in the field of marijuana. The Employee understands and acknowledges that as a result of these efforts, the Company has created, and continues to use and create Confidential Information. This Confidential Information provides the Company with a competitive advantage over others in the marketplace.

6.3 Disclosure and Use Restrictions.

- (a) The Employee covenants: (i) to treat all Confidential Information as strictly confidential; (ii) not to directly or indirectly disclose, publish, communicate or make available Confidential Information, or allow it to be disclosed, published, communicated or made available, in whole or part, to any entity or person whatsoever (including other employees of the Company) not having a need to know and authority to know and use the Confidential Information in connection with the business of the Company and, in any event, not to anyone outside of the direct employ of the Company except as required in the



performance of the Employee's authorized employment duties to the Company or with the prior consent of the Company in each instance (and then, such disclosure shall be made only within the limits and to the extent of such duties or consent); and (iii) not to access or use any Confidential Information, and not to copy any documents, records, files, media or other resources containing any Confidential Information, or remove any such documents, records, files, media or other resources from the premises or control of the Company, except as required in the performance of the Employee's authorized employment duties to the Company or with the prior consent of the Company in each instance (and then, such disclosure shall be made only within the limits and to the extent of such duties or consent). Nothing herein shall be construed to prevent disclosure of Confidential Information as may be required by applicable law or regulation, or pursuant to the valid order of a court of competent jurisdiction or an authorized government agency, provided that the disclosure does not exceed the extent of disclosure required by such law, regulation or order. The Employee shall promptly provide written notice of any such order to the Board of the Company.

- (b) The Employee understands and acknowledges that his or her obligations under this Agreement with regard to any particular Confidential Information shall commence immediately upon the Employee first having access to such Confidential Information (whether before or after he or she begins employment by the Company) and shall continue during and after his or her employment by the Company.
- (c) The Employee agrees that after termination of his or her employment with the Company for any reason (voluntary or otherwise), or upon the Company's request at any time, to immediately return to the Company all Company issued computers, laptops, I-pads (or similar devices) or smart phones, and all Confidential Information in his or her possession, custody or control that he or she obtained, received or prepared in connection with his or her employment with the Company. After termination of his or her employment with the Company, he or she agrees not to retain any copies, summaries, compilations or excerpts thereof, whether in manual, mechanical, electronic or other format. After termination of his or her employment with the Company, to the extent that any Confidential Information exists or is stored on any electronic device in his or her possession, custody or control not issued by the Company to his (e.g., home computer, laptop, i-Pad (or similar device) or smart phone), he or she agrees to delete all Confidential Information on such electronic devices. If requested by the Company, he or she will provide the Company with a certificate signed and satisfactory to the Company confirming that all Confidential Information has been returned or deleted.
- (d) The Employee agrees to keep confidential all Confidential Information during and after the termination of his or her employment with the Company and not to disclose Confidential Information to any third party unless expressly



permitted by the Company policy, as required by law, or with the Company's written consent. Employee further agrees during and after the termination of his or her employment with the Company, not to use Confidential Information for his or her own benefit or for the benefit of any subsequent employer or third party.

7. Ownership of Designs. All designs, concepts, ideas, inventions, improvements, and materials (including, without limitation, images, photographs, likenesses, and any renderings) created or conceived by Employee, solely or jointly with others, during the performance of services hereunder ("Designs") shall be deemed "works-made-for-hire" for the Company within the meaning of the copyright laws of the United States and the Company shall be deemed the sole author thereof in all territories and for all such purposes. To the extent any ownership rights in such Designs might be deemed to reside with Employee, Employee hereby assigns to the Company all right, title and interest it may have in and to such Designs, and any patents, copyrights, trademarks or other proprietary rights based thereon. Employee irrevocably designates and appoints the Company, and each of its duly authorized officers and agents, as its agent and attorney-in-fact to execute and to file any document and to do all other lawfully permitted acts to further the prosecution, issuance and enforcement of patents, copyrights, trademarks and other proprietary rights with the same force and effect as if executed and delivered by the Company.
8. Non-Solicitation of Patients or Customers. Employee acknowledges that the Company's relationships with its patients and customers are extremely valuable and are the result of the investment of substantial time, resources and effort in developing them and keeping them confidential. Employee agrees for a period of twenty-four (24) months after the termination of his or her employment with the Company (whether voluntary or involuntary, with or without cause), not to, directly or indirectly, acting alone or with others, solicit or attempt to solicit, induce to leave or divert or attempt to divert from doing business with the Company, any client or patient of the Company. "Solicit" shall mean directly or indirectly contacting or communicating in any manner with patients or customers or prospective patients or customers, whether orally, in person, electronically, telephonically, in writing, or otherwise, regardless of who initiates the contact, with the intent or where the effect is to influence or facilitate in any degree, induce or cause any client or prospective client to obtain services or product from any entity or person other than the Company.
9. Non-Solicitation of Employees. Employee agrees that for a period of twenty-four (24) months after the termination of his or her employment with the Company (whether voluntary or involuntary, with or without cause) not to, directly or indirectly (a) hire or solicit any then current employee of the Company, candidate for employment or former employee of the Company who voluntarily resigned from the Company within three (3) months termination, to apply for or to accept employment with any business competing with the Company; (b) to induce, assist or enable any then current employee of the Company or candidate for employment with the Company to become employed by any business competing with the Company; and (c) to provide information or assistance to your new employer, or any other person or entity about



any then current employee of the Company or candidate for employment with the Company in connection with hiring or potentially hiring such persons.

10. Non-Interference with Third Party Relationships. Employee agrees that for a period of twenty-four (24) months after the termination of his or her employment with the Company (whether voluntary or involuntary, with or without cause) not to, directly or indirectly encourage any referral source or other third party contracting with Company to cease referring to or contracting with Company.
11. Non-Compete. Employee agrees that for a period of (12) months after the termination of his or her employment with the Company (whether voluntary or involuntary, with or without cause) he or she will not, directly or indirectly, provide services in the field of marijuana in any state in which the Company has received regulatory or zoning approval to be licensed at the time of the termination of Employee's employment with the Company.
12. Non-Disparagement. The Employee covenants that he or she will not at any time make, publish or communicate to any person or entity or in any public forum any disparaging remarks, comments or statements concerning the Company or its businesses, or any of its employees, officers, directors, managers, owners, shareholders or contractors, suppliers, investors or affiliates. This Section does not, in any way, restrict or impede the Employee from exercising protected rights to the extent that such rights cannot be waived by agreement or from complying with any applicable law or regulation or a valid order of a court of competent jurisdiction or an authorized government agency, provided that such compliance does not exceed that required by the law, regulation or order. The Employee shall promptly provide written notice of any such order to the Company.
13. Acknowledgement. The Employee acknowledges that the services to be rendered by him or her to the Company are of a special and unique character; that the Employee will obtain knowledge and skill relevant to the Company's industry, methods of doing business and marketing strategies by virtue of the Employee's employment; and that the restrictive covenants and other terms and conditions of this Agreement are reasonable and reasonably necessary to protect the legitimate business interest of the Company.
14. Remedies. In the event the Employee breaches or threatens to breach any of the obligations contained in the Confidentiality, Non-Solicitation, Non-Compete or Non-Disparagement sections hereof, the Employee acknowledges that the Company will suffer immediate and irreparable harm and that money damages will not be adequate to compensate the Company or to protect and preserve the *status quo*. Therefore, the Employee consents to the issuance of (a) a temporary restraining order and/or a preliminary injunction in any court of competent jurisdiction; and (b) a permanent injunction in the AAA arbitration. The Employee further agrees that the Company will be entitled to all other legal and equitable remedies, where applicable, to which the Company may be entitled. The Employee's covenants set forth above are independent of each other and any other provisions of this Agreement, and the existence of any claim or causes of action by the Employee against the Company, whether predicated on this Agreement or otherwise, shall not constitute a defense to the Company obtaining



relief as described in this section. If the Company is, in its sole judgment compelled to institute legal proceedings and/or arbitration to enforce this Agreement, the Employee agrees to reimburse the Company for its reasonable attorneys' fees and other expenses incurred in the prosecution or settlement of such proceedings, in addition to its damages or other remedies.

15. Arbitration. Any dispute, controversy or claim arising out of or related to this Agreement or any breach of this Agreement shall be submitted to and decided by binding arbitration. Arbitration shall be administered exclusively by the American Arbitration Association in New York, New York and shall be conducted consistent with the rules, regulations and requirements thereof as well as any requirements imposed by state law. Any arbitral award determination shall be final and binding upon the parties. For the avoidance of doubt, the mandatory arbitration requirements of this Section shall not apply in the event the Company seeks injunctive or other equitable relief in response to a breach or threatened breach by the Employee of Sections 9-14 of this Agreement.
16. Governing Law: Jurisdiction and Venue. This Agreement, for all purposes, shall be construed in accordance with the laws of Massachusetts without regard to conflicts of law principles. Any action or proceeding by either of the parties to enforce this Agreement shall be brought only in a state or federal court located in Boston, Massachusetts.

Employees will be required to acknowledge and sign a Nondisclosure Agreement no less than every 18-months during their term of employment.

Confidentiality

Confidential or proprietary information about The Company, its employees, customers, suppliers, cultivation methods and practices are to be kept confidential and divulged only to individuals within the Company with both a need to receive and authorization to receive the information. Employees are only authorized to use confidential business information for the purpose of performing their work duties while employed by The Company. The disclosure of this confidential business information and/or trade secrets to unauthorized persons would be harmful to the Company's business and is thus prohibited. The operations of the Company must particularly not be discussed with competitors. If an employee has any uncertainty as to whether someone is authorized to receive certain information, the employee should contact Management to discuss the matter before any such disclosure is made. An unauthorized employee is prohibited from attempting to use or to obtain the Company's confidential business information or trade secrets.

All records and files maintained by The Company are confidential and remain the property of the Company. All confidential information must be returned to the Company upon termination of employment. Records and files are not to be disclosed to any outside party without the express permission of the CEO.



Confidential information includes all information in any form concerning The Company or its related companies that is disclosed to an employee, that an employee generates, or that otherwise comes to an employee's attention during his or her employment with the Company, whether or not such information is marked "Confidential," but does not include information that is already publicly known through no wrongdoing of the employee or others. Confidential information may include, but is in no way limited to: financial records; business practices; marketing and strategic plans; product designs; personnel and payroll records regarding current and former employees; the identity of, contact information for, and any other account information on customers, vendors, and suppliers; inventions, programs, trade secrets, formulas, techniques, and processes; and any other documents or information regarding The Company's operations, procedures, or practices. Confidential information must remain confidential both during and after the employee's employment with the Company.

An employee handling confidential business information and/or trade secrets is responsible for their security. Extreme care must be exercised to ensure that such information is safeguarded to protect The Company, its suppliers, and its customers. Confidential information obtained during or through employment with The Company may not be used by any employee for the purpose of furthering current or future outside employment or activities or for obtaining personal gain or profit during employment with the Company or at any time thereafter. The Company reserves the right to avail itself of all legal or equitable remedies to prevent impermissible use of its confidential information and/or trade secrets and/or to recover damages incurred as a result of the impermissible use of such information.

Conflict of Interest

Employees are prohibited from engaging in any activity, practice, or act which conflicts with the interests of The Company or its customers. Several examples of conflicts of interest that should always be avoided are set forth below. Situations that create an actual conflict of loyalty or interest, or even the appearance of such a conflict, must be carefully avoided unless approved in advance by the CEO of the Company.

In compliance with state law, no employee shall accept full-time, part-time, or temporary employment with another Registered Marijuana or Marijuana Establishment while actively employed with The Company.

An employee is required to inform the Company before accepting any outside employment or consulting relationship that may take a substantial amount of time. No employee or member of his or her immediate family shall accept gifts from any person or company doing or seeking to do business with The Company under



circumstances from which it might reasonably be inferred that the purpose of the gift is to influence the employee in the conduct of Company business with the donor. If such gifts are received, employees must immediately return the gift and notify the Agent-in-Charge. No employee shall directly or indirectly engage in conduct that is disloyal, disruptive, competitive, or damaging to The Company. It is difficult, involving conflicts of interest. When an employee has questions concerning a possible conflict of interest, he or she should request advice from his or her supervisor.

Intellectual Property

As a condition of employment, each employee must agree that all work-related creations/work product, including, but not limited to, product creations made by an employee, alone or with others, during his or her employment with PATRIOT CARE CORP belong to PATRIOT CARE CORP. Such creations/work product include any project that is made using PATRIOT CARE CORP's confidential information, equipment, supplies, facilities, or made on Company time; any project that relates to the business of the Company or the Company's actual or demonstrably anticipated research or development; and/or any project that results from any work performed by the employee for the Company.

Computer System, E-mail, and Voicemail

Use of PATRIOT CARE CORP's property, including equipment and supplies, for non-work purposes is prohibited. Accordingly, employees should have no expectation of privacy as to any information or file maintained in or on PATRIOT CARE CORP's property or transmitted or stored through PATRIOT CARE CORP's computer systems, voice mail, e-mail, or other technical Capital. All documents and reports related to the use of Company equipment or property are the property of PATRIOT CARE CORP and may be reviewed and used only for purposes that the Company considers appropriate.

PATRIOT CARE CORP's technical resources, such as its computer system, internet access, voice mail system, and e-mail, are provided for work purposes and are to be used only in that pursuit. As a result, computer data, voice mail messages, e-mail transmissions and other documents are not private and are readily available to numerous persons. The Company reserves the right to access, review, and disclose any electronically stored communications or other documents for legitimate business purposes, including without limitation, to locate information; to investigate suspected misconduct, breaches of security, or violation of Company policies; to disclose any information as necessary to satisfy any law or governmental request; or as necessary to protect the Company's interests. Computer documents may also be subject to disclosure in the event of legal action. Employees are required to provide the IT Department with their passwords for computer, e-mail, and voicemail



accounts, including any changes to these passwords, to facilitate the Company's access to the voicemail system, e-mail communications, and computer system. Therefore, an employee is advised not to use PATRIOT CARE CORP's technical resources for personal business or activities.

Accordingly, no employee should expect that any information contained on the Company's technical Capital, including, but not limited to, voicemail messages and e-mail communications, is private. Use of the Company's technical resources constitutes consent to the potential monitoring of the employee's activities on these technical resources and is predicated upon adherence to this Policy.

It is vital to maintain the security and confidentiality of the information in PATRIOT CARE CORP's computer system. Therefore, an employee is required to keep login protocols and passwords confidential and only disclose them to other Company employees on a need-to-know basis. An employee is required to refrain from using unauthorized software or installing any software on the Company's computer system.

During the course of employment, an employee must not use PATRIOT CARE CORP's technical resources for purposes which are adverse to the Company's business interests, including, but not limited to, engaging in unauthorized communications to, or business transactions with, other companies, particularly competitors; transferring the Company's confidential, trade secret or proprietary information to third-parties without the express written consent of the COO; preparing computerized information, files or documents which could be used to compete with the Company; or using the Company's technical Capital to take other actions which are adverse to the Company in any way. In addition, documents created during the course and scope of employees' employment with PATRIOT CARE CORP belong to the Company and the original and all copies of any such documents must be returned to the Company at the time of termination of employment.

Messages stored and/or transmitted by voice mail or e-mail must not contain content that may reasonably be considered offensive, disruptive, or unlawful: Offensive content would include, but not be limited to, sexual comments or images, racial slurs, gender-specific comments, or any comments or images that would offend someone on the basis of his or her race, color, national origin, ancestry, religion, religious dress/grooming, disability, marital status, sex, pregnancy, breastfeeding and related medical conditions, gender, gender identity, gender expression, medical condition (cancer-related condition or genetic characteristics), genetic information, sexual orientation, age, veteran status, Vietnam Era veteran status, disabled veteran status, or any other protected basis.

Disruptive content would include, but not be limited to, sending unsolicited e-mail



or advertising, spawning dozens of processes, making unauthorized attempts to access the systems and networks of others, selling personal items, soliciting for personal charities, or storing or transmitting programs containing viruses or tools to compromise the security of the Company or other sites.

Unlawful content would include, but not be limited to, pornography; libelous and defamatory material, including material that disparages the trade of customers, vendors and competitors; and copyrighted, trademarked, and other proprietary or confidential material used without proper authorization from the owner of the rights thereto.

PATRIOT CARE CORP will investigate employee misconduct that involves the use of technical resources, which is the subject of a complaint or is otherwise brought to the Company's attention. Investigations may include accessing an employee's stored communications.

PATRIOT CARE CORP reserves the right to refuse to post or to remove any communication, information or other content, in whole or in part, that, in the Company's sole discretion, violates this policy, other Company policies, or is otherwise unacceptable.

Providing an Employee with Email Access and Credentials

Managers are required to complete an IT Employee Set-Up Form. The Form must be signed by the employee; acknowledging his/her understanding of the purpose of email and its use. The IT Employee Set-Up Form can be located on the Company's intranet. A copy of the Form must be sent to the Human Capital Department prior to an email address being granted.

SOCIAL NETWORKING

Overview

The use of social networking has become increasingly common and many people use sites such as Facebook, LinkedIn, Twitter, blogs, and all those known or unknown, to communicate in both their personal and their work lives. While the Company in no way intends to restrict its employees' lawful off-duty activities, it has become clear that the Company must have a policy regarding social networking activity while at work and regarding employees' voluntary introduction of PATRIOT CARE CORP or work conducted by the Company into their social networking activities.

Employees should be aware that all communications and data created or accessed by employees on the Company's computer system are not private or confidential, even when passwords are used, or documents are deleted. Employees should have



no expectation of privacy regardless of the activity in which the employee is engaged and regardless of whether the employee is using the computer system during work or non-work time.

In addition, this Social Networking Policy does not alter the Company's policy that employees are only authorized to use the computer system for business purposes.

Use of Social Media and Networking Sites

PATRIOT CARE CORP encourages professional use of social media to network with potential clients and strategic business partners as appropriate as part of employees' work activities.

Employees using social media and networking sites for business purposes must comply with all PATRIOT CARE CORP policies (such as protection of the Company's confidential business information and the prohibition against harassment) in their conduct with regard to any such site. In addition, employees must refrain from posting comments or information that could be characterized as an unlawful invasion of the private lives of others, defamation, unfair competition, threats of violence, or other unlawful activity. Finally, if an employee is using these sites for business purposes, he or she must clearly identify himself or herself as employed by PATRIOT CARE CORP.

In addition, employees using social media and networking sites during work time must do so for business purposes only.

However, the Company recognizes that many employees engage in social media and networking sites during their non-work time for non-work purposes. If employees voluntarily associate themselves with the Company on any social network or other website used for personal activities (e.g., listing PATRIOT CARE CORP as their employer on Facebook), they must comply with all PATRIOT CARE CORP policies (such as protection of the Company's confidential business information and the prohibition against harassment) in their conduct with regard to any such site and refrain from unlawful conduct such as defamation, threats of violence, or the unlawful invasion of the private lives of others. Of course, there is no obligation or expectation that employees will voluntarily associate themselves with the Company during their non-work activities.

The Company reserves the right to block any website or e-mail address on its computer system that it deems to be in violation of Company policy or non-work related. The Company may block access to any or all of its Internet service at any time.

Finally, this policy is not intended to, and does not prohibit, employees' rights to



discuss wages, hours, or working conditions or engage in activity protected by applicable state and federal law. The Company will administer this policy and all other Company policies in accordance with applicable law and should there ever be a conflict between any Company policy and applicable law, the latter will prevail.

DRIVING VEHICLES FOR COMPANY BUSINESS

Overview

Employees who are required to drive a Company vehicle, a rental car or their own vehicle on Company business will be required to show proof of a current and valid driver's/operator's license and current insurance coverage sufficient to meet the minimum requirements specified by law. Employees must provide copies of this documentation to the Company prior to their first day of driving on Company business and at least annually thereafter. If an employee's driver's/operator's license is suspended or revoked, he or she must notify the Human Capital Department immediately. All employees that are required to drive a Company vehicle will be subject to additional background check with the MA Registry of Motor Vehicles to determine suitability. Every employee whose duties include driving must obtain prior written authorization from the Director of the Market or Human Capital Department before operating a Company or personal vehicle on PATRIOT CARE CORP's business.

When driving on Company business, employees are expected to comply with all Company policies, including, but not limited to, safety policies, the Company's non-smoking/e-cigarette, drug and alcohol policy, and its prohibition against the use of handheld cellular phones while driving. In addition, employees are required to immediately report any and all accidents, unsafe conditions, mechanical problems (if a Company vehicle), and any other safety concerns to the Human Capital Department.

Further, the Company requires all employees to fully cooperate in any investigation of accidents or other safety issues.

Cellular Phone Usage

In the interest of the safety of our employees and others on the road, Company employees must adhere to all local government laws applicable to phone usage while driving. In addition, PATRIOT CARE CORP requires that even if local law is less restrictive, employees must use a hands-free cellular device while driving. In addition, employees may not engage in writing, sending, or reading text-based communications, including text messaging, instant messaging, and e-mail, on a wireless device or phone while driving.

Use of Personal Autos on Company Business



PATRIOT CARE CORP will reimburse employees for Company-related automobile travel at a rate determined by the Company, intended to cover related fuel expense, maintenance and depreciation, registration, and insurance.

An employee who operates his or her personal vehicle on Company business must maintain in-force automobile liability insurance sufficient to meet the minimum requirements specified by law. PATRIOT CARE CORP does not provide this insurance coverage for employees.

The employee must report every collision or accident that occurs while he or she is using a vehicle on Company business to the Human Capital Department. If the employee is unable to immediately make the report, the employee's supervisor must do so.

Company Owned Vehicles

All employees that are required to drive a Company vehicle will be subject to additional background check with the MA Registry of Motor Vehicles to determine suitability. Before driving Company owned vehicles, employees must obtain written authorization from the Human Capital or Security Departments.

Employees who are permitted to drive Company vehicles are permitted to do so only for business purposes. No personal use is permitted. Employees are required to return Company vehicles in the condition in which they were received other than normal wear and tear. They are also required to advise the Company of any safety or other problem of which they have become aware with the vehicle. Finally, employees must return Company vehicles and any other Company property at the termination of their employment or at any other time the Company so requests. Failure to do so will result in discipline, up to and including termination, and may result in criminal charges and/or civil liability as well.

DRESS CODE

MTC/ME Dispensary employees will be provided Company shirts to be worn at all times while on duty in the Dispensary or making patient deliveries. Lockers will be provided for street clothes, footwear and other personal effects.

Employees are required to wear personal undergarments under company issued personal protective garments.

IDENTIFICATION CARD/EMPLOYEE BADGE

All employees will be issued and must wear and visibly display their photo MTC/ME Dispensary or Cultivation agent identification cards as issued by the state.

Identification Cards must be worn in a manner that allows the identification of an



employee by photo, first and last name and level of access throughout the facility. This Identification Card will also provide computer login capability and location access to areas through keyless entry.

In compliance with state law, an MTC/ME Dispensary or Cultivation agent employee must keep his or her identification card visible at all times when on the property of a dispensary or cultivation center and during the transportation of marijuana to a registered patient, licensed MTC/ME or licensed independent testing laboratory. During these times, the dispensary or cultivation center employee must also provide the identification card upon request of any law enforcement officer engaged in his or her official duties.

Closed-circuit television surveillance system must be able to capture the printed information on the Identification Card. Therefore, the identification card must be worn in a manner that does not obstruct monitoring. The identification card is to be worn between the shoulders and the waist on a clip or lanyard. The identification card shall not be defaced or altered with pins, stickers, decals, etc.

Employees are responsible for safeguarding their own identification card. Rules regarding employee identification card responsibilities include:

- 1) Do not lend ID to anyone.
- 2) Do not post a copy of the ID on any social network.
- 3) Do not allow unauthorized individuals into any secured or clean areas.
- 4) Do not leave ID on the dash of a vehicle or other locations visible to the public.
- 5) Do not alter the ID in any way.
- 6) Do not use the ID improperly.
- 7) Do not leave the ID unattended.
- 8) Immediately notify your Manager on duty if the ID is no longer in your possession.
- 9) Immediately notify your Manager on duty of any difficulties or problems with the ID.

Any lost or damaged identification card must be immediately reported to the Manager on duty. Employees must surrender the identification card upon request of the Manager on duty or the Director of the Market. Misuse of an identification card will result in termination of employment.



VISITOR BADGES

All persons who are not dispensary or cultivation center employees, but who are permitted on the premises of a dispensary or cultivation center, shall obtain a visitor identification badge from the dispensary or cultivation center personnel prior to entering the dispensary or cultivation center, and shall be escorted and monitored at all times by dispensary or cultivation center personnel.

The visitor identification badge shall be visibly displayed at all times while the visitor is in the dispensary or cultivation center. All visitors, after presenting valid government issued identification with a picture shall be logged in and out, and that log shall include the date, time and purpose of the visit and shall be maintained and made available to the Department, at any time. All visitor identification badges shall be returned to the escorting agent upon the visitor exiting the facility.

EMPLOYEE DISCOUNT & PURCHASE POLICY

All Patriot Care employee/patients are eligible for discount as outlined below. Until Patriot Care receives an adult-use license, this discount is valid only for employees who are qualified patients with active MMJ cards issued by the State.

MA: 40% all products, accessories at cost.

PSC Platinum membership

- All employees who are registered patients are eligible to become a PSC Platinum member in markets that apply
- Employee Patients can either use their employee discount to purchase a membership or they are eligible to enroll in the program for free after they sell their first 10 PSC platinum memberships.
- This membership entitles them to the earn and redeem points based on purchases. They are NOT entitled to exclusive PSC Platinum Member offers.

ALL OTHER PROMOTIONS

- Staff are NOT eligible for any promotions outside of their employee discount and PSC earn/redeem benefits.

Employees Patient purchases

- All Employee Patients must see an MOD when they would like to purchase product.
- The MOD must either perform the transaction or oversee the transaction performed by a sales associate from start to finish.
- All Employee Patient purchases must be entered in Adilas and the Gateway as a normal patient transaction.



- Only the discount above can be applied to Employee Patient purchases, (a total of 40% of the entirety of the order) no other discounts, including recycle, transportation, other system coupons that have expired may not be applied without the consent of the D.O.O or the C.O.O.
- A copy of the invoice must be printed and signed off on by the employee patient and the MOD who oversaw the transaction.

If the Employee Patient is staying to finish out their scheduled shift, the MOD must take the Employee Patient order and place the order in the vault room until the end of the Employee Patient's shift. An Employee Patient purchase cannot be stored on-site unless it's under the MODs supervision. Again, ALL purchases must be placed in the on-site vault room until the Employee Patient finishes their shift.

- When an Employee Patient is at the end of their shift and makes a purchase, or has an order stored in the vault. The Employee Patient must take their order from the MOD and leave Patriot Care Premises Immediately.

Quantity discounts for 0.5mL of vape oil and for 0.5g of shatter may be applied to employee transactions with the following restrictions:

-Employee patients may only purchase up to 2 0.5mL units (or 0.5g units) **per day**. quantity discount may be used once per day for said purchase.

-Management holds the right to restrict employee purchases to a certain quantity based on inventory availability not to exceed 2 units per day per.

MOD Patient Purchases

- All Manager Patients must see an MOD other than themselves when they would like to make a purchase.
- The other MOD must either perform the transaction or oversee the transaction performed by a sales associate from start to finish.
- All Manager Patient purchases must be entered in Adilas and the Gateway as a normal patient transaction.
- Only discounts above can be applied to all Manager Patient, (a total of 40% of the entirety of the order) no other discounts, including recycle, transportation, other system coupons that have expired may be applied without the consent of either the D.O.O or the C.O.O.
- A copy of the invoice must be printed and signed off by the MOD and Manager Patient who oversaw the transaction
- If the Manager Patient is staying to finish out their scheduled shift, the MOD must take the Manager Patient order and place it in the vault until the end of the Manager Patients shift. A Manager Patient purchase cannot be stored on-site unless it is under the MODs Supervision Again ALL purchases must be placed in the on-site vault until employee finishes their shift.



- When an employee is at the end of their shift and makes a purchase, or has an order stored in the vault, the employee must take their order from the other MOD and leave Patriot Care premises Immediately.

General Managers' Responsibilities

- Ensure all employees are trained and have a complete understanding of this policy.
- Ensure policy is followed as well as constantly followed up on this policy.
- Review Adilas for every Employee Patient and Manager Patient purchase, to ensure that all invoices were printed, ensure all invoices are signed off by the MOD that oversaw the transactions. General Manager will confirm all is accurate and signed off for your complete approval Daily & Weekly.
- System coupons must be audited weekly, and all non-active coupons must be inactivated or removed.
- All invoices must be kept in a file organized monthly. Files are not to be remove until a request is sent by DOO, COO or Administration.
- Overrides are to be audited and approved daily by management staff only. This includes but is not limited to: weekly promotions, new patient's specials, specials events, prize wheel, transportation coupons, etc.

Conclusion

- **Failure to follow this policy in full can result in disciplinary action up to and including termination as well as legal action.**

REGULATORY CONDUCT

Equal Employment Opportunity

PATRIOT CARE CORP is an equal employment opportunity employer. The Company will not discriminate against qualified applicants or employees with respect to any terms or conditions of employment based on race, color, religion, religious dress/grooming, sex, national origin, ancestry, age, marital status, pregnancy, breastfeeding and related medical conditions, sexual orientation, gender, gender identity, gender expression, citizenship, disability, medical condition (cancer-related condition or genetic characteristics), genetic information, military status, veteran status, Vietnam Era veteran status, disabled veteran status, or any protected category unless required by law or regulation. Our policy of nondiscrimination applies to all employment practices, including hiring, compensation, benefits, promotion, training, and termination.

Internal Diversity Goals



Patriot Care's diversity goals are to hire, train and retain an efficient, hard-working and qualified labor force that reflects the racial, cultural and ethnic composition of the communities we serve, including people of color, veterans, older workers and persons with physical and/or cognitive disabilities. We strive to provide an equal opportunity for everyone to pursue career advancement and to consistently look within our organization for potential job candidates prior to posting employment offerings on social media or other venues. Importantly, we do not embrace these policies solely out of altruism or an obligation under state requirements, but because experience has taught us that our organization thrives and becomes more productive by maintaining a culture of inclusion where everyone feels valued and their individual contributions are appreciated and rewarded.

Our specific strategies for achieving our internal diversity goals include:

- Building out an up-to-date training and education program, including programs on cultural competency, cultural sensitivity, and implicit bias
- Adopting organizational policies that mandate fairness and equity for all employees
- Offering mentoring programs for disadvantaged and minority employees
- Providing systematic career guidance and planning programs
- Implementing merit-based performance appraisal systems that are non-discriminatory
- Conducting outreach programs such as internship programs, mentoring, community involvement at civic events, and other forums.

Upon hire, all employees are required to review and assign the Company's onboarding package and its policies and procedures manual. Both documents address equal opportunity and contain a zero-tolerance policy for discrimination in any form. Further, the Business Code of Ethics obligates all employees to deal fairly with others, promote a workplace free of conduct that may not be considered harassing, abusive or offensive. Additionally, all employees at the manager level and above are required to complete an on-line sexual harassment training.

Patriot Care Corp provides systemic career guidance and planning for all its employees. Every employee's performance is reviewed at least annually with a focus on identification and reinforcement of their strengths and the development of a plan for any critical needs that are identified. We provide mentoring to all of our employees with a goal of helping them grow in their positions and advance. We strive to promote from within and many of our supervisors and managers are women and people of color.

Patriot Care Corp's parent company, Columbia Care Inc, has instituted several programs to address diversity and ensure equity across its subsidiaries, which include a Diversity Committee, Affinity Groups and the High Potential (HiPo) program as described below. We expect these programs to allow continued progress to be made against our diversity goals in the coming year:



- The Diversity Committee –includes several members of our Senior Management team. It's stated goal is as follows:
 - “Columbia Care values diversity in every form and supports initiatives to ensure all employees feel included in the workplace. This committee will work together and with others in the organization to formalize Columbia Care’s existing initiatives into a formal Diversity program to enhance internal inclusion as well as external candidate sourcing. The initial recruiting focus areas will be gender, ethnicity, veterans, and disability status. The committee will: establish company goals (to improve where appropriate); identify ways to enhance the employee experience and employment brand; and build recruiting and communication plans, as appropriate. Success will be defined through improved diversity metrics and enhanced employment brand (both internally and externally).”
- Affinity Groups – The company will be launching Affinity Groups that focus on creating a diverse workforce. The initial plans are to engage woman’s Affinity Group and a people of color Affinity Group.
- HiPo Program - In 2019, the Company created the HiPo (high potential) program to identify, reward, and develop employees with the potential to grow into more responsible roles throughout the organization. Individuals were selected for this program based on performance, desire to develop, and commitment to the organization. Participants in the HiPo program will be provided with additional opportunities for training and mentorship throughout the pilot.

Community College Program - Patriot Care Corp has developed a highly successful curriculum and run marijuana industry courses at several community colleges located throughout the state. These include Greenfield Community College and Bunker Hill Community College, both of which are service areas of disproportionate impact. These programs have been so successful that we were approached by Cape Cod Community College to hold our classes there as well, which we have done. The curriculum is specific to establishing and operating marijuana establishments and is relevant whether the student wants to be an owner or investor, or simply wants to find a good job within the industry. We have been running this program for over a year now and have held roughly 39 classroom hours of such programs across the 3 community colleges. In total, we have had over 200 students attended these programs and have received excellent response and feedback. This represents roughly 144 hours of executive time to run and participate in these. All proceeds from modest course fees go to the respective community college.

Diversity-Oriented Outreach Plans

Patriot Care’s commitment to diversity is reflected throughout our organization in terms of our recruitment and hiring practices, training programs, mentoring, career advancement opportunities, compensation and benefits policies, outside contracting and social/recreational programs, among others. To this end, Patriot Care continually strives to implement a wide range of diversity-oriented outreach plans to help ensure that prospective job candidates and contractors are aware of the opportunities and benefits we offer and of our commitment to maintaining an equal opportunity environment. We tailor



our outreach plans in each operational market to ensure that our commitment toward achieving workforce diversity is being implemented to the maximum extent possible. These efforts include an analysis of regional census data, conferring with nearby job service offices and reaching out to local vocational schools, community colleges, veterans re-entry programs and advocacy organizations to educate them about our organization and the opportunities we offer.

Documentation

Patriot Care will maintain an auditing system that periodically measures the effectiveness of our commitment to diversity. These will include:

- Records of all referrals, placements, transfers, promotions, terminations, and compensation at all employment levels to ensure that our nondiscriminatory policies are being enforced
- Regularly scheduled internal reports on the extent to which equal employment opportunity and organizational diversity objectives are being attained
- Advisory committee recommendations on potential opportunities for improvement
- Senior Management evaluations of company-wide performance and recommended actions going forward

Americans with Disabilities Act (ADA)

The Americans with Disabilities Act (ADA) and the Americans with Disabilities Amendments Act (ADAAA) are federal laws that require employers to not discriminate against applicants and individuals with disabilities and, when needed, to provide reasonable accommodations to applicants and employees who are qualified for a job, with or without reasonable accommodations, so that they may perform the essential job duties of the position.

It is the policy of PATRIOT CARE CORP to comply with all federal and state laws concerning the employment of persons with disabilities and to act in accordance with regulations and guidance issued by the Equal Employment Opportunity Commission (EEOC). Furthermore, it is the company policy not to discriminate against qualified individuals with disabilities in regard to application procedures, hiring, advancement, discharge, compensation, training or other terms, conditions and privileges of employment.

When an individual with a disability requests accommodation and can be reasonably accommodated without creating an undue hardship or causing a direct threat to workplace safety, he or she will be given the same consideration for employment as any other applicant. Applicants who pose a direct threat to the health, safety and wellbeing of themselves or others in the workplace when the threat cannot be eliminated by reasonable accommodation will not be hired.



PATRIOT CARE CORP will reasonably accommodate qualified individuals with a disability so that they can perform the essential functions of a job unless doing so causes a direct threat to these individuals or others in the workplace and the threat cannot be eliminated by reasonable accommodation or if the accommodation creates an undue hardship to PATRIOT CARE CORP. Contact the Director Human Capital with any questions or requests for accommodation.

All employees are required to comply with the company's safety standards. Current employees who pose a direct threat to the health or safety of themselves or other individuals in the workplace will be placed on leave until an organizational decision has been made in regard to the employee's immediate employment situation. Individuals who are currently using illegal drugs are excluded from coverage under the company ADA policy.

The HR department is responsible for implementing this policy, including the resolution of reasonable accommodation, safety/direct threat and undue hardship issues.

Immigration Act

Employers are responsible for completing and retaining Form I-9. Form I-9 is made up of three sections. Employers may be fined if the form is not complete. Employers are responsible for retaining completed forms. Managers are responsible for confirming the employee's identity and verifying the employee's documents within three (3) days of the employee's start date.

Employers must complete Form I-9 to document verification of the identity and employment authorization of each new employee (both citizen and noncitizen), to work in the United States.

Anti-Discrimination Notice. It is illegal to discriminate against any work-authorized individual in hiring, discharge, recruitment or referral for a fee, or in the employment eligibility verification (Form I-9 and E-Verify) process based on that individual's citizenship status, immigration status or national origin. Employers **CANNOT** specify which document(s) they will accept from an employee. The refusal to hire an individual because the documentation presented has a future expiration date may also constitute illegal discrimination.

Consult with the Human Capital Department if any questions arise.

Health Information Privacy Protection Act (HIPPA)



Health and patient care is among the most personal services rendered in our society; yet to deliver this care, scores of personnel must have access to intimate patient information. In order to receive appropriate care, patients must feel free to reveal personal information. In return, the healthcare provider must treat patient information confidentially and protect its security.

Maintaining confidentiality is becoming more difficult. While information technology can improve the quality of care by enabling the instant retrieval and access of information through various means, including mobile devices, and the more rapid exchange of medical information by a greater number of people who can contribute to the care and treatment of a patient, it also can increase the risk of unauthorized use, access and disclosure of confidential patient information. Within healthcare organizations, personal information contained in medical records now is reviewed not only by physicians and nurses but also by professionals in many clinical and administrative support areas.

The obligation to protect the confidentiality of patient health information is imposed by a myriad of state laws and the federal Health Insurance Portability and Accountability Act of 1996 (HIPAA) as amended under the Health Information Technology for Economic and Clinical Health Act (the "HITECH Act"). Protected health information (PHI) can only be used or disclosed by covered entities and their business associates for purposes of treatment, payment or healthcare operations without the patient's consent.

In order to disclose patient information, healthcare executives must determine that patients or their legal representatives have consented to the release of information or that the use, access or disclosure sought falls within the permitted purposes that do not require the patient's prior consent. Healthcare executives must implement procedures to enable them to account for such disclosures. Once health information is released, healthcare executives must keep records and implement other procedures to ensure that they are able to account to the patient for such disclosures, upon the patient's request.

Managers are responsible for ensuring the Dispensary personnel are provided with HIPPA training during the employee's orientation and training period.

UNLAWFUL HARASSMENT

Overview

PATRIOT CARE CORP is committed to providing a work environment that is free of unlawful discrimination and/or harassment. In keeping with this commitment, the Company maintains a strict policy prohibiting unlawful harassment in the



workplace, including sexual harassment, by any employee and by any third parties such as customers, vendors, suppliers, or visitors. In addition, any unlawful harassment of an individual on the basis of race, color, national origin, age, ancestry, citizenship, religion, religious dress/grooming, sexual orientation, gender, gender identity, gender expression, marital status, disability, medical condition (cancer-related condition or genetic characteristics), genetic information, pregnancy, breastfeeding and related medical conditions, veteran status, Vietnam Era veteran status, disabled veteran status, or any other protected characteristic is also strictly prohibited. PATRIOT CARE CORP' policy against harassment also prohibits disrespectful or unprofessional conduct based on a protected characteristic.

Sexual Harassment

Unwelcome sexual advances, requests for sexual favors, and other verbal, physical or visual conduct of a sexual nature constitute unlawful sexual harassment if: (1) submission to such conduct is made an explicit or implicit term or condition of employment; (2) submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual; or (3) such conduct has the purpose or effect of either (a) unreasonably interfering with an individual's work performance, or (b) creating an intimidating, hostile, or offensive working environment.

Examples of such conduct that may violate this policy include, but are not limited to:

- Verbal conduct, such as offensive or unwelcome sexual flirtations, advances, or propositions; threats or demands to submit to sexual requests; verbal abuse of a sexual nature; graphic verbal commentaries about an individual's body; sexually degrading words used to describe an individual; sexually-oriented jokes; derogatory comments; or slurs;
- Visual conduct such as derogatory posters, photographs, cartoons, drawings, e-mails, screensavers, written materials, or gestures; and
- Physical conduct such as assault, unwelcome physical touching, or blocking normal movement.

Other Prohibited Harassment

PATRIOT CARE CORP also will not tolerate any unlawful harassment of an individual on the basis of race, color, national origin, age, ancestry, citizenship, religion, religious dress/grooming, sexual orientation, gender, gender identity, gender expression, marital status, disability, medical condition (cancer-related condition or genetic characteristics), genetic information, pregnancy, breastfeeding and related medical conditions, veteran status, Vietnam Era veteran status, disabled



veteran status, or any other protected classification.

Examples of such conduct which may violate this policy include, but are not limited to, verbal abuse of a racially derogatory nature; the use of racial or ethnic slurs; racially or ethnically disparaging words used to describe an individual; racial, ethnic or other derogatory jokes, e-mail, screensavers, written materials, drawings or cartoons; and the unwelcome physical touching of others.

Complaint Procedure

PATRIOT CARE CORP will not tolerate unlawful sexual harassment or any other form of prohibited harassment in the workplace by any individual and will impose disciplinary action up to and including termination of employment for violation of this policy. Such conduct may also result in personal legal and financial liability. If you have any questions about what constitutes unlawful harassing behavior, please bring such questions to the attention of the Director of Human Capital, an employee's supervisor, or any other Company manager.

Any individual who feels that he or she has been harassed based on his or her sex, race, national origin, ancestry, or other legally protected characteristic should immediately report the matter to the Department, his or her supervisor, or any other Company manager. The complaint should be as detailed as possible, such as the names of individuals involved, the names of any witnesses, direct quotations when language is relevant, and any documentary evidence.

A prompt investigation will be conducted, and appropriate corrective action will be taken where it is warranted. Appropriate action will also be taken to deter any future unlawful harassment.

Any Company supervisor or manager who becomes aware of any possible sexual or other unlawful harassment must immediately advise the Human Capital Department to initiate an investigation of the matter. All complaints of unlawful harassment will be investigated in as discreet and confidential a manner as possible. Retaliation for making a complaint, participating in an investigation of a complaint, or participating in a government proceeding relating to a complaint is prohibited. No person will be adversely affected in employment with the Company for using this complaint procedure, participating in an investigation, or for filing, testifying, assisting, or participating in any manner in any investigation, proceeding, or hearing conducted by a governmental enforcement agency.

Any employee engaging in improper harassment will be subject to disciplinary action, up to and including termination of employment.



We cannot help you with such problems unless we know about them. Therefore, it is extremely important that you immediately bring these kinds of issues to our attention so that we can take the necessary steps to correct the problem.

Do not assume the Company is aware that there may be a problem. We encourage any employee who has concerns regarding unlawful harassment, who believes he or she is the victim of harassment, or who believes he or she has witnessed harassment to bring his or her concerns to The Human Capital Department, his or her supervisor, or to any member of the Company's management.

We strongly encourage employees to use PATRIOT CARE CORP's procedure for resolving complaints of unlawful harassment, including claims of sexual harassment, and we believe that this procedure is effective. However, in California, employees may file complaints of discrimination, including complaints of sexual harassment or retaliation for having made claims of sexual harassment, with the California Department of Fair Employment and Housing ("DFEH"). The DFEH can be contacted at 1-800-884-1684. Employees in other states may file complaints with their state's anti-discrimination agency. The Human Capital Department can provide specific information in this regard at any time. In addition, the local yellow pages under Government listings and the Internet should also contain contact information for the state's anti-discrimination agency. Employees in any state may also file complaints of discrimination, including complaints of sexual harassment or retaliation for having made claims of sexual harassment, with the federal Equal Employment Opportunity Commission ("EEOC"). The EEOC can be reached at 1-800-669-4000. An employee should be aware that both federal and state law provides time limits (which begin to run from the last date of unlawful harassment) within which complaints must be filed. Therefore, an employee should contact the relevant agency to determine the applicable time limit.

Policy Against Workplace Violence

At PATRIOT CARE CORP, we are firmly committed to providing a workplace that is free from acts of violence or threats of violence. The protection of PATRIOT CARE CORP's employees is paramount. Although some kinds of violence result from societal problems that are beyond our control, we believe that measures can be adopted to increase protection for our employees and to provide a secure workplace. In keeping with this commitment, we have established a strict policy that prohibits any employee from threatening or committing any act of violence in the workplace, while on duty, while on Company-related business, or while operating any vehicle or equipment owned or leased by the Company. This policy applies to all employees, including supervisors and non-supervisory employees, as well as anyone else on Company property, including customers, or anyone conducting Company business off Company property.



To achieve our goal of providing a workplace that is free from violence, we must enlist, and we require the support of all employees. Compliance with this policy and the Company's commitment to a "zero tolerance" policy with respect to workplace violence is each and every employee's responsibility.

Company policy prohibits an employee from bringing any form of weapon into the workplace. An employee who becomes aware of a weapon in the workplace or any other threat of violence must immediately notify his or her supervisor or any member of the Company's management.

Likewise, employees are required to report any incident involving a threat of violence or act of violence immediately to his or her supervisor or to any member of the Company's management and to Security and/or 911 (for the local police) as appropriate. This includes the reporting of any unauthorized individuals on PATRIOT CARE CORP's premises. Supervisors who receive any such reports must immediately inform The Human Capital Department or any officer of the Company who will investigate the matter and take immediate and appropriate corrective action. This may include the imposition of disciplinary action upon any employee who violates this policy, up to and including termination of employment.

If employees become aware of any workplace security hazards or have suggestions for increasing security in the workplace, they should report that information to The Human Capital Department, their supervisor, or to any member of the Company's management as well. Employees are required to report violations of this policy, including any incidents involving actual or threatened violence. They may do so without fear of retaliation of any kind.

If you have any questions concerning this policy, please feel free to contact The Human Capital Department, your supervisor, or any member of the Company's management at your convenience.

NON-DISABILITY LEAVES OF ABSENCE

Bereavement Leave

Full-time employees who have completed three months of employment are eligible for three paid days for the death of an immediate family member. Members of the immediate family include spouses, registered domestic partners, parents, brothers, and sisters, children of registered domestic partners, grandchildren, grandparents, parents-in-law and parents of registered domestic partners. Requests for bereavement leave should be made to the employee's manager as soon as possible. PATRIOT CARE CORP reserves the right to request written verification



of an employee's familial relationship to the deceased and his or her attendance at the funeral service as a condition of the bereavement pay.

Managers should use a Bereavement Pay code when requesting Bereavement Pay.

Domestic Violence Leave

PATRIOT CARE CORP will not discriminate against employees who are victims of domestic violence or sexual assault for taking time off from work to obtain or attempt to obtain any relief, including but not limited to, a temporary restraining order, restraining order, or other injunctive relief to help ensure the health, safety, or welfare of a victim or his or her child.

PATRIOT CARE CORP will also not discriminate against an employee who is a victim of domestic violence or sexual assault for taking time off from work to seek medical attention for injuries caused by such domestic violence or sexual assault, to obtain services from a domestic violence or sexual assault program, to obtain psychological counseling related to the domestic violence or sexual assault, or to participate in actions to increase safety from future domestic violence or sexual assault, including temporary or permanent relocation.

Affected employees must give PATRIOT CARE CORP reasonable notice that they are required to be absent for a purpose stated above, except for unscheduled or emergency court appearances or other emergency circumstances. In such a case, PATRIOT CARE CORP will take no action against affected employees if, within a reasonable time after the appearance, they provide PATRIOT CARE CORP with documentary evidence that their absence was required for any of the above reasons.

This leave will be unpaid. However, affected employees may use paid time off or other accrued time off (if available.)

Victims of Felony Crimes Leave

PATRIOT CARE CORP will grant reasonable and necessary leave from work without pay, to employees who are victims, or whose spouse, child, stepchild, brother, stepbrother, sister, stepsister, mother, stepmother, father, stepfather, registered domestic partner, or child of a registered domestic partner is a victim of a violent or serious felony or felonious theft or embezzlement, for the purposes of attending legal proceedings related to the crime.

Affected employees may elect to use accrued paid time off in lieu of unpaid leave. When feasible, affected employees must provide PATRIOT CARE CORP with advance notice of the employee's need for leave, including a copy of the notice of the



scheduled proceeding. If advance notice is not feasible, affected employees must provide documentation evidencing the legal proceeding requiring the employee's absence within a reasonable time after leave is taken.

Exempt employees may be provided time off with pay when necessary to comply with state and federal wage and hour laws.

School Activities Leave

Employee who are a parent, guardian, or grandparent with custody of a child in kindergarten, grades 1-12, inclusive, or a licensed day care center and wish to take time off to visit their child's school for a school activity or meeting, may take off up to eight hours each calendar month (up to a maximum of 40 hours each calendar year), per child, provided you give reasonable notice to your supervisor of your planned absence. Employees wishing to take leave for a child's school activities may utilize their unused accrued vacation. If no vacation is available or the employee does not wish to use accrued vacation, this time off will be unpaid in accordance with applicable law. PATRIOT CARE CORP may require documentation from the school noting the date and time of the visit.

Employees may also be given time off to attend a school conference involving the possible suspension of their child.

Religious Observation Leave

A request for leave for religious observation should be submitted in writing at least three days before the date of observance. Any such request will be reasonably accommodated without pay. Employees may use unused accrued vacation for this purpose.

Managers should consult with the Director of Human Capital when concerns arise.

Voting Time Leave

If an employee does not have sufficient time to vote in a statewide public election before or after working hours, then the employee will be allowed sufficient time off to go to the polls. This time off will be paid in accordance with state law. Any additional time off not required by law to be compensated will be without pay. Employees must give reasonable notice to the Human Capital Department of the need for time off to vote and must present a voter's receipt to the Human Capital Department upon return to work. Employees should request time off to vote from their supervisor at least two working days prior to Election Day so that the necessary time off can be scheduled at the beginning or end of the work day,



whichever provides the least disruption to the normal work schedule.

Military Leave and Military Partner Leave

An employee who is absent from work due to service in the uniformed services will be given a leave of absence, generally without pay, in accordance with applicable state and federal law. Employees must provide documentation confirming your need for military leave to the Human Capital Department prior to commencement of the leave. Consult with the Director of Human Capital for eligibility and other requirements.

Emergency Duty Leave

Employees who serve as volunteer firefighters, reserve peace officers, disaster or emergency rescue personnel are eligible for an unpaid leave of absence for emergency duty or training. Please see The Human Capital Department for eligibility and other requirements.

Jury Duty

PATRIOT CARE CORP encourages an employee to fulfill his or her civic responsibility by performing jury duty service when summoned. Any employee summoned for compulsory jury duty will be excused for the duration of the trial. Either the Company or the employee may request an excuse from jury duty if, in the Company's judgment, the employee's absence would create serious operational difficulties.

Exempt employees will be paid in accordance with applicable law. A receipt of appearance will be required in order to receive paid leave. If you are selected for extended jury service and experience severe financial hardship, please contact The Human Capital Department.

Compulsory Court Appearances

Any employee who is compelled to appear as a witness by subpoena or other legal process will be excused for the time required to give testimony. Time away from work will be unpaid unless the employee wishes to use vacation time.

Voluntary Court Appearances

The Director of Human Capital must approve voluntary witness or court



appearances on Company time in advance.

Victims of Domestic Violence or Sexual Assault

An employee who is a victim of domestic violence or sexual assault will be allowed to take time off from work to seek relief to help ensure his or her own health, safety, or welfare, or that of his or her children in accordance with the laws of the employee's state. "Relief" includes seeking restraining orders or other injunctive relief. Unless it is an emergency situation, the employee must give the Company reasonable advance notice of his or her need to take time off. If an employee needs time off to address additional issues related to domestic violence or sexual assault, he or she may be eligible for additional unpaid leave and thus should consult with the Human Capital Department.

DISABILITY LEAVES OF ABSENCE

Overview

PATRIOT CARE CORP currently offers several types of disability leaves. An employee may be eligible for more than one leave at the same time. Therefore, as soon as an employee becomes aware of the need for disability leave, he or she should discuss the particular situation with the Human Capital Department. The Company will administer all disability leaves in accordance with applicable law.

Family and Medical Leave

To be eligible for family and medical leave benefits, an employee must: (1) work at a Company location with fifty or more employees within a seventy-five mile radius; (2) have worked for PATRIOT CARE CORP for a total of at least 12 months; and (3) have worked at least 1,250 hours within the 12 month period immediately prior to the requested leave. This policy will be administered in accordance with the requirements of applicable law.

Eligible employees may receive up to a total of 12 workweeks of unpaid leave during a 12-month period. A 12-month period begins on the date of the employee's first use of family and medical leave. The next 12-month period commences on the date of an employee's first use of family and medical leave after completion of any previous 12-month period.

Leave may be used for one or more of the following reasons: (1) for the birth, adoption, or foster care placement of a child; (2) to care for a spouse, domestic partner, child, or parent with a serious health condition; (3) to take medical leave when the employee is unable to work because of a serious health condition, or (4)



any qualifying exigency arising out the fact that an eligible employee's spouse, domestic partner, parent, or child is on, or called for, active military duty in support of a contingency operation or if they or a nearest blood relative becomes ill or is injured in the line of duty (leave totaling up to 26 weeks in a single 12-month period may be taken to care for such an illness or injury). Under some circumstances, employees may take family and medical leave intermittently (take leave in separate blocks of time), or by reducing their normal weekly or daily work schedule. Family and medical leave can be taken in partial day increments. If an employee takes a partial day leave, only the actual amount of time taken will be counted towards his or her annual leave entitlement.

When leave is needed to care for an immediate family member or your own serious health condition, and is for planned medical treatment, you must attempt to schedule treatment so as not to unduly disrupt PATRIOT CARE CORP's operations. If you need family and medical leave, you may be required to provide: 30-day advance notice when the need for the leave is foreseeable; medical certification from a health-care provider (both prior to the leave and prior to reinstatement); periodic recertification; and periodic reports during the leave.

Family and medical leave is unpaid. An employee must use any unused accrued PTO during his or her family and medical leave, except when the leave is related to pregnancy disability or during any time that he or she is receiving paid disability benefits while on leave. The use of paid time off will not extend the length of a family and medical leave.

PATRIOT CARE CORP will maintain, for up to a maximum of 12 work weeks of family and medical leave, any group health insurance coverage that you were provided before the leave under the same terms and conditions as if you had continued to work. During family and medical leave, you are responsible for paying your portion of medical insurance premiums. This payment will be due at the same time as if it had been made by payroll deduction. If unused accrued paid time off is substituted for unpaid family and medical leave, the Company will deduct the monthly co-payment portion of the health insurance premium as a regular payroll deduction. If the leave is unpaid, an employee must make arrangements to pay their monthly co-payment with the Human Capital Department. If the employee's monthly co-payment is not submitted on time, their health benefits may be canceled.

In some instances, PATRIOT CARE CORP is entitled to recover premiums it paid to maintain health coverage if the employee does not return to work following family and medical leave or if he or she returns to work for less than thirty days.

Under most circumstances, upon return from family and medical leave, an employee



will be reinstated to their previous position or to an equivalent position. (There are some exceptions to the reinstatement guarantee for certain key employees.) An employee's use of family and medical leave will not result in the loss of any employment benefit that he or she would otherwise earn or to which he or she would be entitled before using family and medical leave. However, upon return from a family and medical leave, an employee will have no greater right to reinstatement than if he or she had been continuously working rather than on leave.

This policy will be administered in accordance with the federal Family and Medical Leave Act and applicable state family leave laws. Consult with the Director of Human Capital for the particular leave rights and requirements.

Pregnancy Disability/Adoptive Parent Leave

PATRIOT CARE CORP will grant a pregnancy disability/adoptive parent leave if an employee is disabled because of pregnancy, childbirth, a related medical condition, or have a newly adopted child, in accordance with the laws. Generally, this leave contains a guarantee of reinstatement to the same or to a comparable position at the end of the leave. However, an employee will not be entitled to any greater right to reinstatement than if they had been employed continuously rather than on leave. This policy will be administered in accordance with applicable state and federal law.

Pregnancy disability/adoptive parent leave will be given for the period of disability or inability to work, up to the maximum amount required by law. When possible, an employee must provide PATRIOT CARE CORP with 30 days advance notice of their need for a pregnancy disability/adoptive parent leave.

If pregnant, a health care provider's statement, which certifies that an employee is unable to work at all or is unable to perform one or more essential functions of their position without undue risk to the employee, their pregnancy, or others; the date on which an employee became disabled; and the estimated length of any actual disability will be required when requesting approval for a pregnancy disability/adoptive parent leave. Additionally, a medical release from an employee's health care provider must be presented before the employee returns to work from the leave.

In addition to providing pregnancy disability/adoptive parent leave, PATRIOT CARE CORP will make reasonable accommodations (absent undue hardship to the Company) for an employee temporarily disabled due to pregnancy, childbirth, or related medical condition, provided that the employee's request for reasonable accommodation is based upon the advice of her health care provider. Reasonable accommodation may include temporarily modifying the employee's work duties, providing more frequent breaks, or altering her work schedule. An employee may



also request a transfer to a less strenuous or hazardous position/duties when medically indicated.

California employees on pregnancy disability/adoptive parent leave may be eligible for state disability or paid family leave benefits. Employees in other states may be eligible for similar benefits.

Pregnancy disability/adoptive parent leave is unpaid.

If required by the laws, employees on a pregnancy disability/adoptive care leave will continue to receive health insurance coverage under the same terms and conditions as if the employee continued working during the leave period for up to the maximum period required by law. Thus, during pregnancy disability/adoptive care leave, such an employee is responsible for paying the same portion of health insurance premiums as paid while working. This payment will be due at the same time as if it had been made by payroll deduction. If unused accrued PTO is substituted for unpaid pregnancy disability/adoptive care leave, the Company will deduct the monthly health insurance co-payment as a regular payroll deduction when possible. If the leave is unpaid, the employee must make arrangements for payment with the Human Capital Department. If the monthly co-payment is not submitted on time, the employee's health insurance benefits may be canceled.

In some instances, PATRIOT CARE CORP is entitled to recover premiums it paid to maintain health insurance coverage if the employee does not return to work following pregnancy disability/adoptive parent leave.

If on pregnancy disability/adoptive parent leave, an employee may use any unused accrued PTO during the pregnancy disability/adoptive parent leave. The use of paid time off (that is, PTO) will not extend the length of a pregnancy disability/adoptive parent leave.

Workers' Compensation Disability Leave

If an employee is injured or become ill on the job, the employee may be eligible to receive workers' compensation insurance benefits. If an employee has a work-related injury or illness, an employee must:

- Report any work-related injury or illness to their supervisor immediately.
- Complete a written claim form and return it to the Human Capital Department. PATRIOT CARE CORP will grant an employee a workers' compensation disability leave in accordance with applicable law. As an alternative, the Company may offer the employee modified work when appropriate. Employees must report all work-related accidents, injuries, and illnesses, no matter how minor, to their immediate



supervisor. Supervisors must report all such incidents, no matter how minor, to the Human Capital Department. Employees on workers' compensation disability leaves may be eligible for disability benefits. Any such benefits will be coordinated with other wage reimbursement benefits for which the employee may be eligible. At no time will an employee receive a greater total payment than your regular compensation.

- The law requires that PATRIOT CARE CORP to notify the workers' compensation insurance company of any concerns of false or fraudulent claims. Any person who makes or causes to be made any knowingly false or fraudulent material statement or material misrepresentation for the purpose of obtaining or denying workers' compensation benefits or payments is guilty of a felony.

Managers are responsible for reporting all incident and injuries to the Human Capital Department.

Parental Leave

The Massachusetts Parental Leave Act provides male and female employees with eight weeks of job-protected leave in connection with the birth or adoption of a child. Employees are also entitled to eight weeks of job-protected leave in connection with the birth or adoption of a child. Parental Leave law makes clear that if both parents work for the same employer, the employees are entitled to only eight weeks of leave in the aggregate for the same child. An employee may take leave in the event of the placement of a child with the employee pursuant to a court order.

Under the Parental Leave Act employees must be provide with eight (8) weeks of job protection when they have completed three (3) months of employment service. A leave in excess of eight weeks will result in the denial of reinstatement or loss of other rights and benefits. The director of Human Capital will consult with employees request a Parental Leave to ensure that the employee understands the term under which the leave of absence is being extended. The Parental Leave may be granted and designated in concurrence with the Family Medical Leave Act (FMLA).

COMPENSATION AND BENEFITS

Base Compensation

Wage guidelines and job descriptions are available from the Human Capital Department.

Benefit Plans



PATRIOT CARE CORP offers medical, dental and vision benefits to its full-time employees. Summary Plan Descriptions are available from the Human Capital Department.

To the extent that there is any discrepancy between Plan Documents or SPDs and this Handbook, the Plan Documents and SPDs will prevail. The provision of insurance and other employment benefits does not in any way alter the at-will status of employment.

The Company reserves the right, in its sole and absolute discretion, to change policies, carriers, administrators, and coverage regarding any of its employee benefit plans in accordance with applicable law. It also reserves the right, in its sole and absolute discretion, to amend, modify, discontinue, or eliminate any of its employee benefit programs in accordance with the requirements of applicable law.

Company Paid Holidays

Eligible employees will be paid for announced Company holidays whether they fall on a regularly scheduled workday or not. Full-time and part-time employees are eligible.

At the beginning of each calendar year, PATRIOT CARE CORP shall distribute a list of the holidays to be observed during that year. Company holidays may include:

- New Year's Day
- Patriot's Day
- Independence Day
- Thanksgiving Day
- Christmas Day
- Two (2) Floating Holidays
- "You" Holiday

If a holiday falls on a weekend day, it is usually observed on the preceding Friday or the following Monday. Holiday observance will be announced in advance. Holiday pay will be calculated based on the employee's regular rate of pay (as of the date of the holiday) multiplied by the number of hours the employee would have otherwise worked on that day. For example, a regular full-time employee scheduled to work an eight (8) hour shift will be paid eight (8) hours holiday pay. Similarly, a part-time



employee schedule to work a four (4) hour shift will be paid four (4) hours holiday pay.

To be eligible for holiday pay, non-exempt employees must work the last scheduled day before and the first scheduled day following the holiday unless on an approved vacation or the absence is otherwise excused. If a non-exempt employee is required to work on a designated holiday, he or she will receive holiday pay in addition to compensation for actual hours worked. If a non-exempt employee is scheduled to work on a holiday and does not report to work, he or she will not receive holiday pay. If a holiday occurs during an employee's vacation period he or she will be given holiday pay instead of vacation pay. Holiday pay is not used when calculating overtime. Only actual hours worked are used for overtime calculation.

An employee on a leave of absence is not eligible for holiday pay.

Vacation Accrual

Full-time and part-time employees are eligible to accrue vacation benefits. Vacation accrual begins after the completion of 90 days of employment.

Vacation accrual is based on the number of hours worked (up to eight hours per day) each pay period at a rate of 0.0385 hours per hour. The vacation accrual maximum is 120.0 hours for full-time employees and 80.0 hours for part-time employees.

Employees should make every effort to schedule time off for personal appointments (medical appointments, teacher conferences, auto repairs, etc.) before and after working hours.

The employee's paycheck stub will show the amount of vacation available and/or taken each pay period.

Maximum Accrual

Accrued unused vacation will carry over to the subsequent year up to the maximum accrual, and the cash value of any unused accrued vacation at the time of termination of employment will be paid to the employee at his or her final rate of pay. Once the maximum accrual amount has been reached, no additional vacation will be accrued until the vacation balance falls below the maximum. Employees will not be given retroactive credit for any period of time in which there was no accrual because the employee was at the maximum.

Managers are encouraged to make work scheduled available to employees so that vacation time may be used. Production and Manufacturing Departments may post BLACK OUT PERIODS where requests for time off will not be granted due to



production demands. Such postings should be made at least one week in advance.

Use of Vacation

Time away from work to relax and pursue special interests is important to everyone. PATRIOT CARE CORP encourages employees to use vacation each year. Vacation time may be taken in increments of no less than one (1) hour for non-exempt employees and eight (8) hour increments for exempt employees.

Scheduled Vacation

Vacation that is requested and approved by the employee's supervisor in advance of the date of absence is considered "Scheduled Vacation". Employees are not required to give a reason for requesting Scheduled Vacation. Scheduled Vacation of fewer than 5 days may be approved on short notice, based on supervisor discretion and business needs. Scheduled vacation of 5 days or more generally requires a minimum of two weeks' notice for approval of the time off.

Unscheduled Vacation

Vacation that is taken for an unscheduled absence such as an emergency and is not approved in advance by their immediate supervisor is considered "Unscheduled Vacation." Employees taking unscheduled vacation are required to comply with their Department's Punctuality and Attendance Policy regarding absences from work.

Regular attendance is critical to the success of PATRIOT CARE CORP as absences can cause a shortage of production staff and impede the Company's ability to meet harvest objectives. Managers are responsible for addressing attendance concerns quickly.

Payment of Vacation

A request for vacation time off must be submitted to and approved by the employee's supervisor. Vacation will be paid at the employee's current base rate of pay and does not include bonuses or overtime in the calculation.

Employees may not request more vacation than the hours they have accrued. PATRIOT CARE CORP will not carry a negative vacation accrual on any employee. Time off without pay may be taken with approval by the employee's supervisor.

Sick Time Accrual

All employees in Massachusetts can accrue sick time. This includes full-time, part-



time, temporary, and seasonal employees.

Employees accrue and use up to 40 hours per year if they work enough hours. Employees with unused accrued sick time at the end of the year can rollover up to 40 hours. Employees begin to accrue sick time on their first day of work and may begin using accrued sick time after 90 days of employment.

An employee can use sick time when the employee of the employee's child, spouse, parent, or parent of a spouse is sick, has a medical appointment, or has to address the effect of domestic violence. The smallest amount of sick time an employee can take is one hour. Sick time cannot be used as an excuse to be late for work without advance notice of a proper use. Use of sick time for other purposes is not allowed and may result in an employee being disciplined.

Sick Time for Massachusetts employees is governed by state law.

Employees using accrued sick time cannot be fired or otherwise retaliated against for exercising or attempting to exercise rights under the law. Managers should consult with the Director of Human Capital when concerns arise.

Employees must notify their manager before they use sick time, except in an emergency. Employees out of work for 3 consecutive days or using sick time within 2 weeks prior to leaving the Company may be required to provide documentation from a medical provider as outlined by the law.

HIRING, NEW HIRE ORIENTATION AND TRAINING

Hiring Criteria/Background Check

In compliance with the Medical Use of Marijuana Act and the 2017 Marijuana Act, all employees/agents of an MTC/ME Dispensary will be required to:

1. Be at least 21 years old;
2. Be determined to be suitable for registration consistent with the provisions of 935 CMR 500.800 and 500.802. In order to determine such suitability for registration, Patriot Care will perform background checks on all employees prior to their start date and then again on an annual basis prior to renewal of their registrations. These background checks will include but not be limited to a Criminal Offender Record Information (CORI) report for each individual for whom the MTC and ME seeks a dispensary agent registration, obtained within 30 calendar days prior to submission.
3. Complete an application for registration of a dispensary agent, in a form and manner determined by the CCC which shall include but not be limited to:



- a. The full name, date of birth, and address of the individual including all aliases used previously or currently in use by the individual, including maiden name, if any;
- b. Written acknowledgement by the individual of the limitations on his or her authorization to cultivate, harvest, prepare, package, possess, transport, and dispense marijuana in the Commonwealth;
- c. A copy of the dispensary agent's driver's license, government-issued identification card, or other verifiable identity document acceptable to the Department;
- d. An attestation that the individual will not engage in the diversion of marijuana;
- e. A description and the relevant dates of any criminal action under the laws of the Commonwealth, or another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority, whether for a felony or misdemeanor and which resulted in a conviction, or guilty pleas, or plea of *nolo contendere*, or admission of sufficient facts
- f. A description and the relevant dates of any civil or administrative action under the laws of the Commonwealth, another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority relating to any professional or occupational or fraudulent practices
- g. A description and relevant dates of any past or pending denial, suspension, or revocation of a license or registration, or the denial of a renewal of a license or registration, for any type of business or profession, by any federal, state, or local government, or any foreign jurisdiction
- h. A description and relevant dates of any past discipline by, or a pending disciplinary action or unresolved complaint by, the Commonwealth, or a like action or complaint by another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority with regard to any professional license or registration held by the applicant
- i. A non-refundable application fee (paid by the Company); and
- j. Any other information required by the CCC.

A MTC and ME executive registered with the Department of Criminal Justice Information Systems pursuant to 105 CMR 725.100(A)(7) and 935 CMR 500.030 (3) must submit to the CCC a Criminal Offender Record Information (CORI) report for each individual for whom the MTC and ME seeks a dispensary agent registration, obtained within 30 calendar days prior to submission.

A MTC and ME must notify the CCC no more than one business day after a dispensary agent ceases to be associated with the MTC and ME. The dispensary agent's registration shall be immediately void when he or she is no longer



associated with the MTC and ME. **Managers are responsible for coordinating collection efforts with the Security Department.** A registration card will be valid for one year from the date of issue, and may be renewed, in a form and manner determined by the Department, on an annual basis by meeting the requirements in 105 CMR 725.030 (A)-(C) and 935 CMR 500.030. Managers are to consult with the Director of Security in these matters and for further clarification.

After obtaining a registration card for a dispensary agent, a MTC and ME is responsible for notifying the CCC, in a form and manner determined by the CCC, as soon as possible, but in any event, within five business days after any changes to the information that the MTC and ME was previously required to submit to the CCC, or after discovery that a registration card has been lost or stolen. Managers must notify the Vice President of Security immediately. Employees are subject to correction action for failure to notify their manager in a timely manner which is defined as “as soon as practical and no later than the point at which they are aware of the lost or stolen identification card.”

A dispensary agent must carry his or her registration card at all times while in possession of marijuana, including at all times while at a MTC and ME or while transporting marijuana. Managers are responsible for adherence and application of Standards of Conduct.

Non-Selection of a Candidate

Candidates’ records that fail to qualify for employment resulting from an unfavorable background check or fingerprint reports are to be maintained in the Human Capital Department for a period of three (3) years. Such records shall be maintained in the HRMS system for a period in accordance with 935 CMR 500.105(9), 935 CMR 501.105 (9), 935 CMR 502.105 (9), M.G.L. c. 6, s. 172 and 803 CMR 2.00. All such records shall be password protected and maintained in a secured network accessible only by authorized personnel.

Storage and Retention of Criminal Offender Record Information (CORI)

The Human Capital Department shall be the custodian of records for the Company. Hard copies of CORI shall be stored in a separate locked and secure location in the Human Capital Department. PATRIOT CARE CORP’s Human Capital Department shall limit access to the locked and secure location to Human Capital and Security employees who have been approved to access CORI.

Electronically-stored CORI shall be password protected and encrypted. The Human Capital Department shall limit password access to only those employees who have been approved to access CORI.



CORI shall not be stored using public cloud storage methods. There is no exception to this rule. For this reason, CORI reports may not be emailed through any public cloud system.

PATRIOT CARE CORP shall not retain CORI for longer than seven years from the date of employment or volunteer service, or from the date of the final employment or licensing decision of the requestor regarding the subject, whichever occurs later in compliance with the Act.

Destruction of Criminal Offender Record Information (CORI)

PATRIOT CARE CORP shall destroy hard copies of CORI by shredding or otherwise before disposing of CORI.

The Vice Presidents of Security and Human Capital shall direct the destruction of electronic copies of CORI by deleting them from the hard drive on which they are stored and from any system used to back up the information before disposing of CORI.

The destruction process shall appropriately clean all information by electronic or mechanical means before disposing of or repurposing a computer used to store CORI.

Required Dissemination of Criminal Offender Record Information (CORI)

PATRIOT CARE CORP shall provide a copy of the CORI information or other criminal history information and the source of other criminal history information regarding a subject to the subject:

- (a) Before asking the subject any questions regarding the subject's criminal history; and (b) before making an adverse employment or licensing decision based on the subject's CORI.
- (2) Each employer or governmental licensing agency that is overseen, regulated, or supervised by a governmental entity shall, upon request, disseminate CORI to that governmental entity's staff.

Permissive Dissemination of Criminal Offender Record Information (CORI)

Only the Vice President of Human Capital or Security may disseminate CORI to the subject.



If PATRIOT CARE CORP is a party to a complaint or legal action as a result of any decision based on CORI, PATRIOT CARE CORP may disseminate CORI to an administrative agency or court for the purpose of defending its decision.

The Company may disseminate CORI to its staff that are authorized to request, receive, or review CORI for the purposes of evaluating the subject's application for employment.

Managers are responsible for consulting with the Vice Presidents of Security or Human Capital in any and all matters related to CORI reporting, processes and procedures of the Company.

Criminal Offender Record Information (CORI) Policy Requirement

PATRIOT CARE CORP shall:

1. provide an employment applicant with the opportunity to dispute the accuracy of the information contained in the CORI;
2. Provide the employment applicant with a copy of DCJIS information regarding the process for correcting CORI; and document all steps taken to comply with 803 CMR 2.17.

Adverse Employment Decision Based on Criminal History Information Received from a Source Other than Department of Criminal Justice Information Services (DCJIS)

Before PATRIOT CARE CORP takes adverse action on an employment applicant's application for employment based on the employment applicant's criminal history information that was received from a source other than DCJIS, PATRIOT CARE CORP shall:

1. Comply with applicable federal and state laws and regulations;
2. Maintain a copy of the Company's CORI policy on a DCJS website.

Requirement to Maintain a Secondary Dissemination Log

PATRIOT CARE CORP shall record such dissemination in a secondary dissemination log. The log shall be maintained in the Human Capital Department. The secondary dissemination log must include:

- (a) The subject's name;
- (b) The subject's date of birth;
- (c) The date and time of dissemination;
- (d) The name of the person to whom the CORI was disseminated along with the name of the organization for which the person works, if applicable; and
- (e) The specific reason for dissemination.



The secondary dissemination log may be maintained electronically or on paper. Secondary dissemination log entries shall be maintained for at least one year. A secondary dissemination log shall be subject to audit by DCJIS.

Employment Decision Based on Criminal Offender Record Information (CORI)

Before taking adverse action on an employment applicant's application for employment based the employment applicant's CORI, PATRIOT CARE CORP's Human Capital Department shall:

1. comply with applicable federal and state laws and regulations;
2. notify the employment applicant in person, by telephone, fax, or electronic or hard copy correspondence of the potential adverse employment action;
3. provide a copy of the employment applicant's CORI to the employment applicant;
4. provide a copy of PATRIOT CARE CORP's CORI Policy, if applicable;
5. identify the information in the employment applicant's CORI that is the basis for the potential adverse action;
6. provide a copy of the employment applicant's criminal history information to the employment applicant including the source of the other criminal history information;
7. provide the employment applicant with the opportunity to dispute the accuracy of the criminal history information;
8. provide the employment applicant with a copy of DCJIS information regarding the process correcting criminal records; and
9. document all steps taken to comply with these requirements.

Use of a Consumer Reporting Agency (CRA) to Make Employment Decisions

PATRIOT CARE CORP may use the services of a Consumer Reporting Agency (CRA) to request CORI regarding an employment applicant.

Before a CRA can request CORI from DCJIS on PATRIOT CARE CORP's behalf, PATRIOT CARE CORP shall:

1. notify the employment applicant, in writing and in a separate document consisting solely of such notice, that a consumer report may be used in the employment decision making process; and
2. obtain the employment applicant's separate written authorization to conduct background screening before asking a CRA for the report regarding the subject. PATRIOT CARE CORP shall not substitute the CORI Acknowledgement Form for this written authorization.



3. certify to the CRA is in compliance with the Federal Fair Credit Reporting Act (FCRA), 15 U.S.C. § 1681.
4. not misuse any information in the report in violation of federal or state laws or regulations.
5. provide accurate identifying information for the employment applicant to the CRA and the purpose for which the subject's CORI is being requested.
6. provide the employment applicant with a pre-adverse action disclosure, before adverse action is taken, that includes a copy of the employment applicant's consumer report and a copy of A Summary of Your Rights Under the Fair Credit Reporting Act, published by the Federal Trade Commission and obtained from the CRA, by meeting the employment applicant in person, or by telephone, by electronic communication, by fax, or by hard copy correspondence;
7. notify the employment applicant in person, by telephone, fax or electronic or hardcopy, correspondence of the potential adverse employment action;
8. provide a copy of the CORI to the employment applicant;
9. provide a copy of the employer's CORI Policy, if applicable, to the employment applicant;
10. identify the information in the employment applicant's CORI that is the basis for the potential adverse decision;
11. provide the employment applicant with an opportunity to dispute the accuracy of the information contained in the CORI; and
12. provide the employment applicant with a copy of the DCJIS information regarding the process for correcting a criminal record.

PATRIOT CARE CORP's process shall document all steps taken to comply with 803 CMR 2.21(2).

Initial Introductory Period

PATRIOT CARE CORP has an introductory period for new employees. During the introductory period, the Company will evaluate employees' work habits and abilities to make sure that employees can perform their job satisfactorily. The introductory period also gives the employee time to decide if the new job meets his or her expectations.

The introductory period for all new and rehired employees is the first 90 calendar days after their hire date. If an employee is promoted or transferred within PATRIOT CARE CORP, the employee may be asked to complete a secondary introductory period of the same length.



If an employee is absent for a significant amount of time during the introductory period, the length of the absence may automatically extend the introductory period. A Manager may also extend the introductory period if we decide it was not long enough to evaluate an employee's performance. This could happen either during or at the end of the introductory period.

Managers should perform an informal performance review with the employee for the purpose of outlining continued areas of growth and opportunity.

Training

In accordance with 935 CMR 500.105(2), 935 CMR 501.105(2) and 935 CMR 502.105(2), PATRIOT CARE CORP will ensure that all of its employees complete training prior to beginning their specific job functions. Upon hire, the Human Capital department will enter all new agents into our required training program which must be satisfactorily completed before commencing work. This training shall be tailored to roles and responsibilities of the job function of each employee. At a minimum, staff shall receive eight hours of on-going training annually. Training programs will be designed, tracked and managed by each functional area in conjunction with the Human Capital department. Training will begin with internal trainers covering a wide assortment of subjects depending on the function to be performed by the new employee. These subjects may include but not be limited to diversity training, operations, security equipment and measures, product transportation, product storage, quarantine, inventory quality assurance measures, label verification, inventory management, recall, return and destruction policies, diversion prevention, sanitary and safety measures and recordkeeping. The training program will consist of one-on-one sessions and may include videos, workbooks and manuals. Trainees must take and pass subject matter examinations and obtain a certificate of completion.

Documentation shall be maintained in each employee's personnel file indicating all training, including training regarding privacy and confidentiality requirements and the signed statement of the employee indicating the date, time and place he or she received said training and the topics discussed, including the name and title of the presenters. On or after July 1, 2019, all employees involved in the handling and sale of marijuana for adult use at the time of licensure or renewal of licensure, as applicable, shall have attended and successfully completed a responsible vendor program to be designated a "responsible vendor" as detailed in 935 CMR 500.105(2)(b).

HOURS OF WORK

Business Hours



Business hours must be posted in the employee lounge. Any changes to business operations should be communicated with employees in a timely manner.

Working Hours

Managers are responsible for establishing employee work schedules. Work scheduled must be posted and made available to employees in advance of the workweek. Work scheduled must include a duty free meal period where applicable.

Meal Period

Except for certain exempt employees, all employees who work six or more hours in a day must take a duty free 30 minute unpaid meal period. An employee who works over ten hours in a day need to take a second 30 minute unpaid duty-free meal period unless the employee elects to waive the second meal period with their Manager. Employees are completely relieved of their job responsibilities during their meal periods. For this reason, unless this is a valid written agreement for an on-duty meal period, employees must clock in and out for their meal periods, or record the beginning and ending time of the meal period on their timesheet every day.

Breaks

Employees will receive one, fifteen-minute paid break for every four hours worked.

PEOPLE RELATIONS

Job Classifications

Full-Time Employees: Full-time employees are scheduled to work on a regular basis for 40 hours or more per week.

Part-Time Employees: Part-time employees are scheduled to work on a regular basis for less than 35 hours per week.

Seasonal Employees: Seasonal employees are defined as those employees holding jobs of limited duration arising out of special projects, excessive workloads, or emergencies. An employee will not change from seasonal status to another status unless specifically informed of such a change, in writing, by the Human Capital Department.

Overtime for Non-Exempt Employees

The following terms are used in this Handbook to describe the classifications of employees and their employment status. Managers are responsible for understanding the different classifications and their application. Consult with the Director of Human Capital to address any concerns.

Exempt: Employees whose positions meet specific tests established by state and federal law and who are exempt from overtime compensation requirements.



Non-Exempt: Employees whose positions do not meet state and federal exemption tests and who are paid overtime pay according to applicable state and federal law. Executive, professional, and administrative employees who meet certain duties and salary requirements are exempt from overtime laws. Therefore, they are not eligible for overtime compensation if they work additional hours. Generally, all other employees are non-exempt.

PATRIOT CARE CORP reserves the right to assign the hours of work for all non-exempt employees. At times it may be necessary for non-exempt employees to work overtime.

Non-exempt employees will be paid for overtime worked in accordance with federal and state requirements. Paid holidays, vacation, sick time, and leaves of absence are not considered hours worked for the purpose of computing overtime.

PROHIBITED CONDUCT

Overview

It is not possible to list all the forms of conduct that are considered unacceptable in the workplace, but the following are some examples of conduct that may result in corrective discipline up to and including termination of employment.

This list is not intended to be exhaustive. Examples:

- Providing false or incomplete information on an employment application or any other Company document.
- Theft or the deliberate or careless damage of any Company property or the property of any employee, customer, or vendor.
- Failure to report knowledge of theft or the deliberate or careless damage of property committed by other employees or outsiders.
- Possessing, distributing, selling, transferring, using, or being under the influence of alcohol or illegal drugs while performing work duties, while on Company business, or at any time on Company premises.
- Carrying firearms or any other dangerous weapons, items, or substances, at any time, while on premises occupied by PATRIOT CARE CORP, its customers, its patients, or its affiliates.
- Engaging in criminal conduct. Insubordination, including, but not limited to, failure or refusal to follow the instructions of any supervisor or member of management, or the use of abusive or threatening language or acts toward any supervisor or member of management.
- Any use of threatening or abusive language or acts directed towards another person at any time. This includes any words or actions that amount to sexual or other unlawful harassment. (Please see "Unlawful Harassment.")
 - Violence or threat of violence in the workplace. (Please see "Policy Against Workplace Violence.")



- Tardiness or absenteeism without proper notification and/or without a valid reason.
- Leaving Company premises during work hours without notifying their supervisor.
- Falsifying your time record or the time record of another employee.
- Working overtime without supervisor authorization.
- Failure to adhere to work schedules, including meal periods.
- Violating any safety, health, or security policy, rule, or procedure of the Company.
- Committing a fraudulent act or a breach of trust.
- Horseplay, including but not limited to, counterproductive or disruptive work habits and/or engaging in personal business activity on Company premises.
- Failure to use good judgment.

Again, the above list is merely a list of examples of misconduct. If an employee has any doubt about whether an act or activity will constitute misconduct, he or she should consult with the Human Capital Department.

Corrective Action

In order to assure orderly operations and provide the best possible work environment, PATRIOT CARE CORP expects employees to follow rules of conduct that will protect the interests and safety of all personnel. Violation of Company rules and policies may result in a verbal warning, a written warning, or termination of employment. There is no requirement that discipline be progressive or that a warning be given prior to termination. This policy regarding prohibited conduct does not alter or limit the Company's policy of employment at-will. Either an employee or the Company may terminate the employment relationship at any time for any reason, with or without cause or notice. The Company also reserves the right to demote, or to otherwise discipline an employee without resort to corrective disciplinary procedures.

SAFETY

General Sanitary Requirements

All areas in the dispensary and cultivation center shall take all reasonable measures and precautions to ensure that:

1. Any person who, by medical examination or supervisory observation, is shown to have, or appears to have, an illness, open lesion, including boils, sores or infected wounds, or any other abnormal source of microbial contamination for whom there is a reasonable possibility of contact with marijuana shall be excluded from any operations that may be expected to result in microbial contamination until the condition is corrected.



2. Hand-washing facilities are adequate and convenient and are furnished with running water at a suitable temperature. Hand-washing facilities shall be located in the permitted premises and where good sanitary practices require employees to wash and/or sanitize their hands, and provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices.
3. All persons working in direct contact with marijuana shall conform to hygienic practices while on duty, including but not limited to:
 - a. Maintaining adequate personal cleanliness;
 - b. Washing hands thoroughly in adequate hand-washing areas before starting work and at any other time when the hands may have become soiled or contaminated
 - c. Refraining from having direct contact with marijuana if the person has or may have an illness, open lesion, including boils, sores or infected wounds, or any other abnormal source of microbial contamination, until the condition is corrected.
4. Litter and waste are properly removed and the operating systems for waste disposal are maintained in an adequate manner so that they do not constitute a source of contamination in areas where marijuana is exposed
5. Floors, walls and ceilings are constructed in such a manner that they may be adequately cleaned and kept clean and in good repair.
6. There is adequate lighting in all areas where marijuana is stored and where equipment or utensils are cleaned.
7. There is adequate screening or other protection against the entry of pests. Rubbish shall be disposed of so as to minimize the development of odor and minimize the potential for the waste becoming an attractant, harborage or breeding place for pests
8. Any buildings, fixtures and other facilities are maintained in a sanitary condition.
9. Toxic cleaning compounds, sanitizing agents, and solvents used in the production of marijuana concentrates shall be identified, held and stored in a manner that protects against contamination of marijuana, and in a manner, that is in accordance with any applicable local, State or federal law, rule, regulation or ordinance.
10. All contact surfaces, including utensils and equipment used for the preparation of marijuana or marijuana-infused products, shall be cleaned and sanitized as frequently as necessary to protect against contamination. Equipment and utensils shall be designed and shall be of such material and workmanship as to be adequately cleanable and shall be properly maintained. Only sanitizing agents



registered with the CCC pursuant to the Massachusetts Pesticide Act shall be used; they shall be used in accordance with labeled instructions.

11. The water supply shall be sufficient for the operations intended and shall be derived from a source that is a regulated water system. Private water supplies shall be derived from a water source that is capable of providing a safe, potable and adequate supply of water to meet the facility's needs.
12. Plumbing shall be of adequate size and design, and adequately installed and maintained, to carry sufficient quantities of water to the required locations throughout the facility. Plumbing shall properly convey sewage and liquid disposable waste from the facility. There shall be no cross-connections between the potable and waste water lines.
13. All operations in the receiving, inspecting, transporting, segregating, preparing, producing, packaging and storing of marijuana and marijuana infused products shall be conducted in accordance with adequate sanitation principles.
14. Each dispensary and cultivation center shall provide its employees with adequate and readily accessible toilet facilities that are maintained in a sanitary condition and good repair.
15. Marijuana that can support the rapid growth of undesirable microorganisms shall be held in a manner that prevents the growth of these microorganisms.
16. The Company shall allow the CCC to conduct on-going operational inspections at all Marijuana Treatment Centers, Marijuana Establishments and Cultivation/Manufacturing centers to determine whether the facilities, methods, practices and controls used in the manufacture or holding of marijuana and marijuana-infused products conform to or are operated or administered in conformity with good manufacturing practices to ensure that food products for human consumption are safe and have been prepared, packed and held under sanitary conditions.
17. All licensed dispensaries and cultivation centers shall immediately allow the CCC to inspect the premises and all utensils, fixtures, furniture, machinery and devices used for preparing manufactured marijuana-infused products.
18. CCC will conduct inspections with regard to the manufacture and preparation of marijuana-infused products under the authority of the Massachusetts Food, Drug and Cosmetic Act, the Food Handling Regulation Enforcement Act and the Food Service Sanitation Code
19. The Company shall be under the operational supervision of a certified food service sanitation manager.



Alcohol, Smoke and Drug-Free Workplace

PATRIOT CARE CORP is committed to maintaining an alcohol, smoke/vape, and drug-free workplace. In compliance with the Massachusetts Fair Employment Practices Act, the Massachusetts Smoke-Free Workplace Law, the Company intends to protect workers from health hazards resulting from exposure to secondhand smoke and to help provide a safe and drug-free work environment for our patients and employees. Employees with self-reported covered disabilities that require reasonable accommodation will be accommodated as required by law. This does not mean that PATRIOT CARE CORP is required to tolerate abuse on the job; it may mean altering schedules to allow for participation in therapy programs, etc. The federal ADA considers the current use of alcohol as a disability, but not the current use of illegal drugs. However, the ADA does protect drug users who are either participating in, or who have completed, a supervised drug rehabilitation program and are no longer current drug users.

With this goal in mind and because of the serious drug abuse problem in today's workplace, we are establishing the following policy for employees of PATRIOT CARE CORP.

- PATRIOT CARE CORP shall be responsible for providing an alcohol, smoke (including the use of e-cigarettes, and drug-free environment for all employees working in an enclosed workplace.
- Smoking and the use of e-cigarettes are prohibited in common work areas, hallways, conference and meeting rooms, offices, employee lounges, restrooms, staircases, classrooms, registration areas and enclosed outdoor platforms.
- Use of tobacco or smoking-related products, to include e-cigarettes, is prohibited with all buildings, facilities, vehicles and spaces (including covered walkways, covered parking, parking lots, and commons.
- The use, possession, solicitation for, or sale of narcotics or other illegal drugs, alcohol, or prescription medication without a prescription on Company premises or while performing an assignment is prohibited.
- Being impaired or under the influence of legal or illegal drugs or alcohol away from the Company if such impairment or influence adversely affects the employee's work performance, the safety of the employee or of others, or puts at risk the Company's reputation is prohibited.
- Being medically intoxicated while on Company premises is prohibited.
- Possession, use, solicitation for, or sale of legal or illegal drugs or alcohol away from the Company's premises, if such activity or involvement adversely affects the



employee's work performance, the safety of the employee or of others, or puts at risk the Company's reputation is prohibited.

- The presence of any detectable amount of prohibited substances in the employee's system while at work, while on the premises of the Company or while on Company business is prohibited. Prohibited substances include illegal drugs, alcohol, or prescription drugs or medication not taken in accordance with a prescription given to the employee.

PATRIOT CARE CORP may conduct drug and/or alcohol testing for its' drivers under any of the following circumstances:

1. Random Testing: Employees may be selected at random for drug/medication and/or alcohol testing at any interval determined by the Company.
2. For-Cause Testing: The Company may ask an employee to submit to a drug/medication and/or alcohol test at any time it feels that the employee may be under the influence of drugs/medication or alcohol, including, but not limited to, the following circumstances: evidence of drugs or alcohol on or about the employee's person or in the employee's vicinity, unusual conduct on the employee's part that suggests impairment or influence of drugs or alcohol, negative performance patterns, or excessive and unexplained absenteeism or tardiness.
3. Post-Accident Testing: Any employee involved in an on-the-job accident or injury under circumstances that suggest possible use or influence of drugs/medication or alcohol in the accident or injury event may be asked to submit to a drug and/or alcohol test. "Involved in an on-the-job accident or injury" means not only the one who was or could have been injured, but also any employee who potentially contributed to the accident or injury event in any way.

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

While at work, all PATRIOT CARE CORP employees have the responsibility to perform their jobs in a safe, conscientious, and effective manner and in compliance with Company policy and state and federal laws. In order to do this, employees must be able to work in a drug/medication and alcohol-free environment and themselves be free from the effects of drugs/medication and alcohol.

Accordingly,

1. The manufacture, sale, possession, or use by an employee in the workplace of a controlled substance or drug that is illegal under state or federal law is strictly prohibited. The phrase "use" means any detectible level of that substance in the employee's system;



2. The manufacture, being under the influence of or use by an employee in the workplace of alcohol is strictly prohibited, except as permitted by this policy;
3. The use by an employee of a controlled substance or drug with a lawful prescription may be prohibited if such use affects job performance or poses a hazard to the safety and welfare of the employee, or other employees, is strictly prohibited; and
4. An employee is required to report his/her criminal drug statute conviction for a violation occurring in the workplace to his/her immediate supervisor within five (5) days after such conviction.

PATRIOT CARE CORP will impose disciplinary sanctions (consistent with local, state and federal law) on employees who violate the drug/medication and alcohol-free workplace policy. Sanctions may include any of the following, depending on the severity of the incident: a last chance warning, successful completion of a treatment/counseling program, termination, and referral for prosecution.

PATRIOT CARE CORP reserves the right to conduct an individual drug test where there is reasonable suspicion that an employee may be under the influence of illegal drugs or alcohol or following a job related accident or injury.

Furthermore, each employee who observes or has knowledge of other employees in a condition which affects their ability to perform job duties or poses a hazard to the safety and welfare of others has a duty to report such conditions promptly to the immediate supervisor, the next higher-level supervisor, the VP of Security, or the VP of Human Capital.

On occasions, PATRIOT CARE CORP may serve alcohol at social or other Company sponsored events. The prohibitions in this policy do not apply to the possession or moderate consumption of alcohol when alcohol is served by PATRIOT CARE CORP at a PATRIOT CARE CORP sponsored event to which the employee has been invited. Employees are reminded that any consumption of alcohol at such an event should be moderate, should not result in the employee becoming intoxicated and that normal expectation of appropriate workplace behavior continue at such events.

PATRIOT CARE CORP takes its commitment to provide a drug/medication and alcohol-free working environment seriously. All employees who suspect they may have a drug, substance or alcohol abuse problem are encouraged to seek assistance through their own efforts before the problem affects their employment status.



Diversity Plan – Addendum

Following the RFI requests from the Cannabis Control Commission to add a statement that our Diversity Plan will adhere to the requirements set forth in 935 CMR 500105(4), the statement has been added and can be found in the first paragraph of page 5 of this document.



Diversity Plan

Patriot Care's Values, Goals and Priorities

Nationally, Columbia Care, the parent company of Patriot Care has adopted the following statement that it applies across all of its operations:

Columbia Care values diversity in every form and supports initiatives to ensure all employees feel included in the workplace. In 2019 Columbia Care formed a Diversity and Inclusion Committee which is comprised of the company's Chief Human Capital Officer, the Chief Risk Officer, the VP of Human Capital Programs and several operations associates from around the country. The Committee is working with others in the organization to formalize Columbia Care's existing initiatives into a formal Diversity program to enhance internal inclusion as well as external candidate sourcing. The initial recruiting focus areas will be gender, ethnicity, veterans, and disability status. The committee will: establish company goals (to improve where appropriate); identify ways to enhance the employee experience and employment brand; and build recruiting and communication plans, as appropriate. Success will be defined through improved diversity metrics.

Thus, Patriot Care is fully committed to the concept and practice of Diversity, Equity, Inclusion and Belonging in all aspects of employment and is working to create and sustain a workforce that reflects the diversity of the community in Massachusetts, and in its capital city, in particular. Patriot Care recognizes the systemic roots of inclusion and exclusion in the cannabis industry and will actively work to address and remedy them.

Nationally, Columbia Care has worked to ensure all employees feel included in the workplace. Columbia Care's Diversity & Inclusion Committee works together with others in the organization to drive internal inclusion efforts as well as external candidate sourcing. The committee is charged with identifying ways to enhance the employee experience and employment brand, building recruiting plans with a diverse focus on gender, ethnicity, veterans, and disability status. Since September 2019, the Diversity & Inclusion Committee has established a Women's Affinity group and a People of Color Affinity group which allow employees to work with like individuals towards a common business goal while enhancing relationships and diverse mentorship opportunities across the organization. Columbia Care continues to partner with Women Grow in support of women in the cannabis industry who are looking to expand their own business and/or grow into leadership within the industry and is currently looking for opportunities to partner with other national diversity-focused organizations. In addition, Columbia Care instituted a mandate that all executive positions have at least one diverse candidate in the finalist slate. Since that initiative began, Columbia Care has hired one and promoted four



executives. 3/5 of those executives are diverse by gender and/or ethnicity. At the Board level, one member of the Columbia Care Board of Directors is a person of color. Patriot Care intends to continue those efforts in its operations in the Commonwealth and in Boston, in particular. As we have previously stated, our current staff in Boston is comprised of 60% people of color and 50% women and as we hire additional staff we intend to target increasing these percentages.

As such, the Boston-based diversity and inclusion program and employment plan at Patriot Care has four major prongs:

- Increase Diversity, Equity, Inclusion and Belonging in our workforce and contracting with M/W/DBE as we continue to grow in the Commonwealth.
- Pro-actively engage citizens returning from incarceration to make them aware of opportunities for them both at Patriot Care and across the cannabis industry.
- Partner and collaborate with community-based initiatives to enhance civic and economic empowerment in communities disproportionately impacted by the war on drugs.
- Offer our employees competitive wages and benefits packages as well as provide opportunities for advancement within the Company.

Action Oriented Planning

Employment, contracting and barriers to business creation in the cannabis industry for diverse communities are well documented. Going forward, Patriot Care will create specific programs to address these concerns, outlining objectives, action items and assigning appropriate timelines.

As an initial matter, Patriot Care plans a proactive program to address outreach, marketing and recruitment. The objective of the program is to improve and enhance the recruitment of qualified employees on a non-discriminatory basis including, attending career fairs and other recruiting activities whose target attendees include women, Black, Hispanic, Asia/Pacific Islander, individuals with disabilities and members of the lesbian, gay, bisexual and transgender community and foreign-born immigrants.

Managerial Responsibility

Managerial and supervisory team members share in the responsibility to ensure compliance with the company's Diversity, Equity, Inclusion and Belonging plan. Managers and supervisors will also be responsible for ensuring that there is a multifaceted input and feedback loop to facilitate communication on workplace conditions and diversity initiatives. In furtherance of those goals, all managers and



supervisors will receive training or additional training on effectuating workforce processes; these would include the recruitment, interviewing, selection, and promotion of a diverse workforce.

Goals and Objectives

Patriot Care commits to specific targets and metrics for each of these prongs and will report back to the CCC on our progress on an annual basis as part of the renewal process. We understand that specificity and self-assessment are critical to meaningful, sustained progress.

Since first applying for a medical marijuana dispensary license in 2014, Patriot Care has striven to be a corporate citizen that reflects Boston and is responsive to the desires of the community and we are proud of our many accomplishments. However, 2020 demands that we redouble our efforts, both inside and outside of the cannabis space, to reflect and be responsive to the community in which we are fortunate to operate. These are the key elements of our plan to increase diversity, inclusion and belonging in our staffing and contracting following provisional licensure:

Goals and Metrics:

- New hires at the Milk Street location will match or exceed Boston demographics for racial/ethnic diversity.
 - *Metric:* The City of Boston is currently 56% Black, Latinx, and Asian. Our target is to match or exceed that diversity in new hires in staff and management ranks. The company already exceeds these metrics for its staff at its MTC currently operating at 21 Milk Street and intends to maintain or improve that further as it brings on new hires for adult-use.
- Increase contractor diversity with minority-owned businesses and woman-owned businesses in the first year post-licensure
 - *Metric:* Target 15% contractor relationships with certified MBE/WBE.
 - Inform all our contractors that subcontracting with MBEs/WBEs is considered a plus factor for project bids
 - Secure supply arrangements with at least 2 licensed social equity cultivator wholesalers (one has already been secured).
- Increase proportion of Boston resident employees at Patriot Care
 - *Metric:* Target goal of 75% of new hires at Milk Street to be Boston residents.



Programs:

In an effort to meet these goals, Patriot Care will design and implement an internal audit and reporting system designed to measure the effectiveness of its Diversity, Equity, Inclusion and Belonging program; in so doing, we will promptly become aware of the need for any remedial action and determine the extent to which Patriot Care's goals are being met. Patriot Care will adhere to the requirements set forth in 935 CMR 500.105(4), which provides the permitted and prohibited advertising, branding, marketing and sponsorship practices of Marijuana Establishments. Patriot Care will achieve its hiring goals following provisional licensure:

- by partnering with community based or non-profit organizations to co-sponsor at least two job fairs in the next six months located in Boston communities of color
 - Patriot Care has committed to hold at least one of these events at the Fairmont Innovation Lab in Dorchester, and has reached out to the Roxbury Innovation Center as a potential location (COVID-19 pandemic response allowing);
- by partnering with the Urban League to participate in their outreach, education and hiring programs;
- by continuing our Cannabis 101 seminars at Bunker Hill Community College. The next seminar is set for September 29, 2020 and October 6, 2020. These types of events have been well attended by Bostonians looking to understand more about how to enter and succeed in the cannabis industry.
- by our existing commitments to listing job openings with ads 2 columns wide by 6" in publications such as the Bay State Banner, El Mundo, Dorchester Reporter, Rainbow Times and Bay Windows; and,
- by using technology platforms such as Indeed.com and Twitter to specifically target Black and Latinx potential employees with job opportunity notifications.

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