Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR285091

Original Issued Date: 11/20/2024

Issued Date: 11/20/2024

Expiration Date: 11/20/2025

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Webster Cannabis Company LLC

Phone Number: 508-962-0635 **Email Address:** gary@cannabisofworcester.com

Business Address 1: 4 Town Forest Road **Business Address 2:**

Business City: Webster **Business State:** MA **Business Zip Code:** 01570

Mailing Address 1: 4 Town Forest Road **Mailing Address 2:**

Mailing City: Webster **Mailing State:** MA **Mailing Zip Code:** 01570

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

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

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 100 **Percentage Of Control:** 100

Role: Owner / Partner **Other Role:**

First Name: Gary **Last Name:** Baldyga **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: **Percentage Of Control:**

Role: Manager **Other Role:**

First Name: Stephen **Last Name:** Bowman **Suffix:**

Gender: Male **User Defined Gender:**

What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: Matthew **Last Name:** Teguis **Suffix:**

Types of Capital: Monetary/Equity **Other Type of Capital:** **Total Value of the Capital Provided:** $100000 **Percentage of Initial Capital:** 100

Capital Attestation: Yes

CAPITAL RESOURCES - ENTITIES

Entity Contributing Capital 1

Entity Legal Name: Webster Cannabis Company LLC **Entity DBA:**

Email: garygary1973@yahoo.com **Phone:** 508-862-0635

Address 1: 4 Town Forest Road **Address 2:**

City: Webster **State:** MA **Zip Code:** 01570

Types of Capital: Monetary/Equity **Other Type of Capital:** **Total Value of Capital Provided:** $100000 **Percentage of Initial Capital:** 100

Capital Attestation: Yes

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Gary **Last Name:** Baldyga **Suffix:**

Marijuana Establishment Name: Cannabis of Worcester LLC **Business Type:** Marijuana Retailer

Marijuana Establishment City: Worcester **Marijuana Establishment State:** MA

Individual 2

First Name: Stephen **Last Name:** Bowman **Suffix:**

Marijuana Establishment Name: Cannabis of Worcester LLC **Business Type:** Marijuana Retailer

Marijuana Establishment City: Worcester **Marijuana Establishment State:** MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 4 Town Forest Road

Establishment Address 2:

Establishment City: Webster **Establishment Zip Code:** 01570

Approximate square footage of the establishment: 3577 **How many abutters does this property have?:** 35

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

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	WCC HCA Signed 12.21.2023.pdf	pdf	6584ad3dfa86d00008c02dd3	12/21/2023
Plan to Remain Compliant with Local Zoning	WCC_Compliance_Plan to Remain Compliant with Local Zoning 12.21.2023.docx.pdf	pdf	6584ae2e0f1a2500089e6052	12/21/2023
Community Outreach Meeting Documentation	WCC Community Outreach Documentation 4.25.2024 (1)-combined copy.pdf	pdf	6629803b7910420008700e27	04/24/2024
Community Outreach Meeting Documentation	webster abutters list redacted (2).pdf	pdf	66298094f707fa0008efffe2	04/24/2024
Executed HCA Waiver	HCA Waiver Form complete 5.1.2024.pdf	pdf	66328c957910420008784cb0	05/01/2024

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

POSITIVE IMPACT PLAN

Positive Impact Plan:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	WCC_PIP.pdf	pdf	65b009b058452f00089cb94d	01/23/2024

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner **Other Role:**

First Name: Gary **Last Name:** Baldyga **Suffix:**

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 2

Role: Manager **Other Role:**

First Name: Stephen **Last Name:** Bowman **Suffix:**

RMD Association: Not associated with an RMD

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	WCC Cert of Good Standing 1.10.2024.pdf	pdf	65a6d3440f1a250008b34dd4	01/16/2024
Department of Revenue - Certificate of Good standing	DOR cert WCC 1.5.2024.pdf	pdf	65a6d36ffa86d00008d51080	01/16/2024
DUA attestation if no employees	dua attestation 2.6.2024.pdf	pdf	65c3fa48f8aae3000974f298	02/07/2024
Articles of Organization	WCC AOO 2.15.2024.pdf	pdf	65ce798cf8aae300097d0927	02/15/2024
Bylaws	Signed Operating Agreement.pdf	pdf	65ce79f24e4a6100071f4813	02/15/2024

No documents uploaded

Massachusetts Business Identification Number: 001663471

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Proposed Timeline	Webster Proposed Timeline for Achieving Operation 11.28.2023.pdf	pdf	65668f5fbc2d0900087924e7	11/28/2023
Plan for Liability Insurance	Webster Liabiility Insurance Plan.pdf	pdf	6566916cbc2d090008792534	11/28/2023
Business Plan	Webster Business Plan Draft 1.23.2024.pdf	pdf	65b015007252ab00087c0466	01/23/2024

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for obtaining marijuana or marijuana products	WCC-Plan for Obtaining Marijuana or Marijuana Products_11.28.2023.pdf	pdf	6566a00abc2d090008792ce1	11/28/2023
Restricting Access to age 21 and older	WCC_Restricting Access to Age 21 and older.pdf	pdf	6566a288a126090008936ca0	11/28/2023
Prevention of diversion	WCC_Prevention of Diversion Policy and Procedure.pdf	pdf	6566aa2ebc2d090008792f61	11/28/2023
Storage of marijuana	WCC_Storage of Marijuana.pdf	pdf	6566ab3ea126090008936ecc	11/28/2023
Inventory procedures	WCC_Inventory of Marijuana.pdf	pdf	6567a09abc2d0900087a52d0	11/29/2023
Dispensing procedures	Wcc_Dispensing Procedures.pdf	pdf	6567a8fdbc2d0900087a5fa1	11/29/2023
Record Keeping procedures	WCC_Record Keeping procedures.pdf	pdf	6567ae70a126090008949a0e	11/29/2023
Maintaining of financial records	WCC_Maintenance of Financial Records.pdf	pdf	6567b020bc2d0900087a6cb7	11/29/2023
Qualifications and training	WCC_Qualifications and training policy.pdf	pdf	6567b438bc2d0900087a72be	11/29/2023

Energy Compliance Plan	WCC_Energy Efficiency and Compliance.pdf	pdf	6567b4f7a12609000894a435	11/29/2023
Security plan	WCC_Security Procedures 1.23.2024.pdf	pdf	65b018207252ab00087c109c	01/23/2024
Transportation of marijuana	WCC_Transportation of Marijuana 1.23.2024.pdf	pdf	65b03bc158452f00089d4db8	01/23/2024
Quality control and testing	WCC_Quality Control and Product Testing Updated 1.23.2024.pdf	pdf	65b03df47252ab00087c77d6	01/23/2024
Personnel policies including background checks	WCC_Personnel Policies.pdf	pdf	65b040687252ab00087c799c	01/23/2024
Diversity plan	WCC_DIVERSITY PLAN Updated 1.23.2024.pdf	pdf	65b0413c58452f00089d5152	01/23/2024

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

ATTESTATIONS

I certify that no additional entities or individuals meeting the requirement set forth in 935 CMR 500.101(1)(b)(1) or 935 CMR 500.101(2)(c)(1) have been omitted by the applicant from any marijuana establishment application(s) for licensure submitted to the Cannabis Control Commission.: I Agree

I understand that the regulations stated above require an applicant for licensure to list all executives, managers, persons or entities having direct or indirect authority over the management, policies, security operations or cultivation operations of the Marijuana Establishment; close associates and members of the applicant, if any; and a list of all persons or entities contributing 10% or more of the initial capital to operate the Marijuana Establishment including capital that is in the form of land or buildings.: I Agree

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

Notification:

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification:

COMPLIANCE WITH POSITIVE IMPACT PLAN - PRE FEBRUARY 27, 2024

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

Monday From: 8:00 AM	Monday To: 10:00 PM
Tuesday From: 8:00 AM	Tuesday To: 10:00 PM
Wednesday From: 8:00 AM	Wednesday To: 10:00 PM

Thursday From: 8:00 AM	**Thursday To:** 10:00 PM
Friday From: 8:00 AM	**Friday To:** 10:00 PM
Saturday From: 8:00 AM	**Saturday To:** 10:00 PM
Sunday From: 8:00 AM	**Sunday To:** 10:00 PM

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

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:

   Webster Cannabis Company LLC

2. Name of applicant's authorized representative:

   Gary Baldyga

3. Signature of applicant's authorized representative:

4. Name of municipality:

   Webster, MA

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

   Richard LaFond

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).)*:

   rlafond@webster-ma.gov

8. Host community agreement execution date:

   11/23/20

Plan to Remain Compliant with Local Zoning

Objective

Webster Cannabis Company is committed to remaining compliant with the regulatory guidelines detailed in 935 CMR 500.000 et. seq. ("the Regulations") and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission ("CCC") or any other regulatory agency.

Zoning Background and Requirements

The city of Webster has enacted a zoning ordinance regulating the time, place, and manner of Marijuana Establishments.

This ordinance, Chapter 11 Section 8 of the Webster City Ordinances allows Marijuana Establishments to operate within approved zoning districts. Webster Cannabis Company is compliant with all physical siting requirements outlined in this ordinance.

A Host Community Agreement from the city is required and has been secured. Webster Cannabis Company has received a Host Community Agreement from the city of Webster.

Webster Cannabis Company attorneys and consultants have reviewed the ordinance in its entirety and developed plans and strategies to ensure compliance with all the requirements and special permit conditions.

Ongoing Compliance

Webster Cannabis Company is committed to remaining in compliance with all local codes, ordinances, and bylaws.

Our local attorney and compliance consultants will make periodic assessments of our operation for compliance with all applicable local, state, and federal laws and regulations, including zoning and special permit compliance.

Webster Cannabis Company is in and will remain in regular contact with local Officials to ensure that lines of communications remain open. Webster Cannabis Company will remain up to date with all zoning bylaw changes and requirements.

Webster Cannabis Company is approved "By Right" and requires no additional special permits.

REVISION HISTORY

Version	Date	Comment
1.0	Dec 21, 2023	Created by Casey Nothe

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Community Outreach Meeting Attestation Form

Instructions

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

Attestation

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

1. The Community Outreach Meeting was held on the following date(s): 2/15/2024
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: 2/2/2024

   b. Name of publication: WEBSTER TIMES

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: 2/1/2024

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: 1/26/2024

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:

WEBSTER Cannabis CO. LLC

Name of applicant's authorized representative:

Gary BAIDYGA

Signature of applicant's authorized representative:

Attachment A

Notification of Community Outreach Meeting

Notice is hereby given in accordance with the Massachusetts General Laws Chapter 40a Section 11 that Webster Cannabis Company LLC, of 4 Town Forest Road, Webster, MA, 01570, will be conducting a community Outreach Meeting intended for a Adult Use Marijuana Retail Establishment License, seeking to provide Marijuana and Marijuana Infused Products to adults over the age of 21.

A Community Outreach Meeting will take place at 4 Town Forest Road, Webster, MA, 01570, on Thursday, February 15th, 2024 at 7:00 p.m.

All interested parties are invited to be present. There will be an opportunity for the public to ask questions at the end of the presentation.

Febuary 2, 2024

Febuary 9, 2024

Attachment B

Good afternoon Mr. Craver,

I hope this letter finds you well.

I am writing to inform you that our organization will be hosting a Community Outreach Meeting for the establishment of an Adult Recreational Marijuana Dispensary at 4 Town Forest Road.

The meeting will take place on Thursday, February 15th @ 7:00 PM and will be open to the public, with a forum for questions at the end of the presentation.

We have sent out formal notices to all abutters. Additionally, a notice has been scheduled to appear in the Webster Press starting on Friday February 2nd for two consecutive weeks.

Thank you for your time and have a great day.

Best Regards,

Webster Cannabis Company LLC

RECVD WEBSTER TOWN CLERK
FEB 1 '24 PM3:55

Attachment C

Notification to Abutters
Of Community Outreach Meeting

Date: 1/18/2024

Re: 4 Town Forest Road
Webster, MA
01570

Dear Property Owner:

In accordance with the Massachusetts General Laws Chapter 40a Section 11 you are hereby notified that Webster Cannabis Company of 4 Town Forest Road, Webster, MA, 01570, will host a Community Outreach Meeting intended for a Retail Marijuana Dispensary seeking to provide Marijuana and Marijuana Infused Products to Massachusetts residents above the age of 21.

A Community Outreach Meeting will take place on Thursday, February 15th, 2024 at 7:00 PM located at 4 Town Forest Road, Webster, MA, 01570.

All interested parties are invited to be present. There will be an opportunity for the public to ask questions at the end of the presentation.

If you have any question, please contact the Town Administrator at (508) 949 -3800.

Respectfully,

Webster Cannabis Company LLC

TOWN OF WEBSTER MASS

[redacted]
WEBSTEIt, MA 01570

[redacted]
WORCESTER. MA 01613

[redacted]
ALEXANDRIA, VA 22320

[redacted]

[redacted]
WEBSTER, MA O 1570

[redacted]
OXFORD, MA 01540

[redacted]
THOMPSON, C·T 06277

[redacted]
WORCESTER, MA O 1606

ABUTTERS LIST- 500 Ft

[redacted]
WEBSTER, MA01570

[redacted]
WEBSTER, MA 01570

[redacted]
\WEBSTER, MA 01570

[redacted]
SECAUCUS. NJ 07094

[redacted]
WEBSTER, MA O1570

[redacted]
THOMASVILLE, NC 27360

[redacted]
WEBSTER, \tIA 01570

[redacted]
WEBSTER, MA O 1570

[redacted]
WEBSTER, MA O 1570

[redacted]
WF.BSTER, MA 01570

[redacted]
WII:BSTER, MA 01570

[redacted]
WEBSTER, MA 01570

[redacted]
WEBSTER, MA O 1570

[redacted]
WEBSTER. MA 01570

[redacted]
WEBSTER, MA 01570

CERTIFIED

JAN 13 2024

ABUTTERS LIST

Webster Cannabis Company LLC

PLAN TO POSITIVELY IMPACT AREAS OF DISPROPORTIONATE IMPACT

Overview

Webster Cannabis Company LLC ("Webster Cannabis Company" or the "Company") is committed to serving and supporting populations and communities falling within Areas of Disproportionate Impact (ADI) in the City of Worcester. The Company has created the following Plan to Positively Impact Areas of Disproportionate Impact (the "Plan") to establish specific goals and programs for carrying out this commitment.

Goals

Webster Cannabis Company has established the following goals:

1. Priority hiring of individuals from Commission-designated ADI in the City of Worcester (i.e. Census Tracts 7302, 7305, 7310.02, 7312.03, 7312.04, 7313, 7314, 7315, 7317, 7318, 7323.02, 7324, 7327 and 7330) and Massachusetts residents with past drug convictions, with the specific goals of having:

    a. at least 30% of all employees at the Retailer facility in Webster be present or past residents of the Commission-designated Census Tracts in Worcester listed above; and b. at least 10% of all employees at the Retailer facility in Webster having past drug convictions.

Programs

Webster Cannabis Company has developed specific programs to effectuate its stated goals, which will include:

1. Holding at least one career fair per year in a Commission-designated ADI in the City of Worcester and advertising such job fairs in the Worcester Telegram & Gazette;

2. Advertising employment opportunities in the Worcester Telegram & Gazette using advertisements that encourage past or present residents of ADI in the City of Worcester and Massachusetts residents with past drug convictions to apply.

Measurements

Webster Cannabis Company's Management Team will administer the Plan and will be responsible for developing measurable outcomes to ensure Webster Cannabis Company continues to meet its commitments. Such measurable outcomes, in accordance with Webster Cannabis Company's goals and programs described above, include:

1. Conducting, no less than annually, employment composition reviews to determine: · What percentage of employees at the Retailer facility live or have lived in a Commission designated ADI (identified by voluntary employment questionnaires), and

· What percentage of employees at the Retailer Facility have past drug convictions (identified by voluntary employment questionnaires);

2. Documenting each time the Company advertises and holds a career fair and the number of resumes received and individuals hired as a result of such participation, including specifically the number of individuals:
    - That live or have lived in a Commission-designated ADI in the City of Worcester (identified by voluntary employment questionnaires), and
        - That have past drug convictions (identified by voluntary employment questionnaires);

Beginning upon receipt of Webster Cannabis Company's first Provisional License from the Commission to operate a Retailer facility in the Commonwealth, Webster Cannabis Company will utilize the proposed measurements to assess its Plan and will account for demonstrating proof of success or progress of the Plan upon the yearly renewal of the license. Webster Cannabis Company is mindful that demonstration of the Plan's progress and success will be submitted to the Commission upon renewal.

Acknowledgements

Webster Cannabis Company will adhere to the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment.

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

The Commonwealth of Massachusetts

Secretary of the Commonwealth

State House, Boston, Massachusetts 02133

William Francis Galvin
Secretary of the
Commonwealth

November 29, 2023

TO WHOM IT MAY CONCERN:

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

WEBSTER CANNABIS COMPANY LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **June 12, 2023.**

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

I also certify that the names of all managers listed in the most recent filing are: **GARY BALDYGA, STEPHEN BOWMAN**

I further certify, the names of all persons authorized to execute documents filed with this office and listed in the most recent filing are: **GARY BALDYGA, STEPHEN BOWMAN**

The names of all persons authorized to act with respect to real property listed in the most recent filing are: **GARY BALDYGA, STEPHEN BOWMAN**

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

William Francis Galvin

Secretary of the Commonwealth

Processed By:BOD

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

mass.gov/dor

Letter ID: L1481302176
Notice Date: January 4, 2024
Case ID: 0-002-278-853

CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE

WEBSTER CANNABIS COMPANY
1191 SCHOOL ST # WEBSTER
WEBSTER MA 01570-3034

Why did I receive this notice?

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

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

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

What if I have questions?

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

Visit us online!

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

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

Edward W. Coyle Jr

Edward W. Coyle, Jr., Chief
Collections Bureau

The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: $500.00

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

Certificate of Organization
(General Laws, Chapter)

Identification Number: 001663471

1. The exact name of the limited liability company is: WEBSTER CANNABIS COMPANY LLC

2a. Location of its principal office:
No. and Street: 1191 SCHOOL STREET
City or Town: WEBSTER State: MA Zip: 01570 Country: USA

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

No. and Street: 1191 SCHOOL STREET
City or Town: WEBSTER State: MA Zip: 01570 Country: USA

3. The general character of business, and if the limited liability company is organized to render professional service, the service to be rendered:
TO ORGANIZE FOR THE SOLE PURPOSE OF APPLYING FOR A LICENSE WITH THE CANNABIS CONTROL COMMISSION OF THE STATE OF MASSACHUSETTS.

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:
Name: GARY BALDYGA
No. and Street: 1191 SCHOOL STREET
City or Town: WEBSTER State: MA Zip: 01570 Country: USA

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

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
MANAGER	GARY BALDYGA	1191 SCHOOL STREET WEBSTER, MA 01570 USA
MANAGER	STEPHEN BOWMAN	1191 SCHOOL STREET WEBSTER, MA 01570 USA

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

Title	Individual Name	Address (no PO Box)

	First, Middle, Last, Suffix	Address, City or Town, State, Zip Code

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

Title	**Individual Name** First, Middle, Last, Suffix	**Address** (no PO Box) Address, City or Town, State, Zip Code
REAL PROPERTY	GARY BALDYGA	1191 SCHOOL STREET WEBSTER, MA 01570 USA
REAL PROPERTY	STEPHEN BOWMAN	1191 SCHOOL STREET WEBSTER, MA 01570 USA

9. Additional matters:

SIGNED UNDER THE PENALTIES OF PERJURY, this 12 Day of June, 2023,
GARY BALDYGA

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

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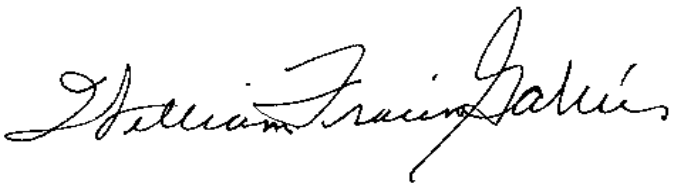
THE COMMONWEALTH OF MASSACHUSETTS

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

June 12, 2023 12:51 PM



WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

CERTIFICATE OF ORGANIZATION
OF
WEBSTER CANNABIS COMPANY

A MASSACHUSETTS LIMITED LIABILITY COMPANY

Pursuant to Massachusetts General Laws Chapter 156C, Section 12 (or the corresponding section of any future law of this state), the undersigned Massachusetts limited liability company submits the following Certificate of Organization for filing.

ARTICLE 1
Name

The exact name of the company is **Webster Cannabis Company**.

ARTICLE 2
Company Address

The street and mailing address of the company's principal registered office is 1151 School Street, Webster, Massachusetts 01570.

ARTICLE 3
Purpose

This company is organized for the purposes of transacting any and all lawful business for which companies may be formed under state law

The company's principal business activity is in the field of retail. _____

ARTICLE 4
Registered Agent

The registered agent is Gary Baldyga, an individual located at 1151 School Street, Webster, Massachusetts 01570.

ARTICLE 5
Duration

The company will exist for a perpetual duration.

ARTICLE 6
Management

The management of the company is reserved to the members.

ARTICLE 7
Initial Members

Gary Baldyga, an initial member of the company, is located at 1151 School Street, Webster, Massachusetts 01570.

The undersigned Organizer of Webster Cannabis Company executed this Certificate of Organization as of the date set forth below:

Organizer Signature: [signature]

Organizer Name: GARY BALDYGA

Organizer Address: 1191 SCHOOL ST
WEBSTER MA 01570

Date: 07

LIABILITY INSURANCE PLAN

OBJECTIVE

Webster Cannabis Company LLC will obtain and maintain General Liability and Product Liability insurance coverage as required in 935 CMR 500.105(10).

Webster Cannabis Company LLC will engage with an insurance provider that offers General and Product Liability Insurance coverage in the amounts required in 935 CMR 500.105(10).

The insurance provider is established in the legal marijuana industry.

OBTAINMENT OF INSURANCE PLAN

Webster Cannabis Company LLC will obtain and maintain general liability insurance coverage for no less than $1,000,000 per occurrence and $2,000,000 in aggregate, annually, and product liability insurance coverage for no less than $1,000,000 per occurrence and $2,000,000 in aggregate, annually.

The deductible for each policy will be no higher than $5,000 per occurrence.

If Webster Cannabis Company LLC cannot obtain the required insurance coverage, Webster Cannabis Company LLC will place a minimum of $250,000 in an escrow account. These funds will be used solely for the coverage of liabilities.

Webster Cannabis Company LLC will replenish this account within ten business days of any expenditure.

Webster Cannabis Company LLC will maintain reports documenting compliance with 935 CMR 500.105(10) in a manner and form determined by the Commission pursuant to 935 CMR 500.000.

The General Liability and Product Liability Insurance reports will be made available to the CCC upon request.

REVISION HISTORY

Version	Date	Comment
1.0	November 2023	Created by Casey Nothe

Webster, MA Marijuana Adult Recreational Retail Dispensary Business Plan

Date 11/28/2023

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Confidential, Security, and Disclaimer Statements

Confidential Statements

This document (the "Business Plan") contains confidential information proprietary to Webster Cannabis Company LLC., hereinafter referred to as the "Company" (the "Company"). This information and related conversations are submitted solely for the purpose of introducing selected parties to the Company's Business Plan. The Company's disclosure of information contained herein and in related conversations does not constitute authorization for the recipient of the Business Plan to use the information, ideas, or concepts contained herein for any purpose other than the evaluation of the Company, or to disclose any information to any other parties. The Company retains ownership of this Business Plan, including any and all concepts and ideas described herein. Each recipient of this document agrees to treat the information in a strictly confidential manner. The recipient may not disclose, directly or indirectly, or permit any agent or affiliate to disclose any information contained herein or reproduce this document in whole or part without the prior written consent of the Company, unless otherwise required by applicable law. Any party who accepts delivery of this Business Plan, or any other document(s) or verbal communication(s) of confidential information from the Company, agrees to be bound by the terms of this Confidentiality Statement, and further agrees to promptly return any such documents and materials to the Company upon request.

Security Statements

This Business Plan does not constitute an offer to sell or the solicitation of an offer to buy any securities, or an offer to sell or the solicitation of an offer to buy such securities in any circumstances in which such offer or solicitation is unlawful. Neither the delivery of this Business Plan nor any sale of the Company's securities shall, under any circumstances, create any implication that there has been no change in the affairs of the Company since the date hereof, or that information contained herein is correct as of any time subsequent to its date.

Disclaimer Statements

The market analysis and financial projections presented herein represent the Company's best judgment and reasonable assumptions of future events and circumstances; all other information contained herein has been obtained from sources deemed reliable. However, no warranty or representation, expressed or implied, is made as to the accuracy or completeness of any information contained herein, and same is submitted subject to errors and omissions, and no representations or warranties of future company performance or market trends are intended, and such are expressly disclaimed.

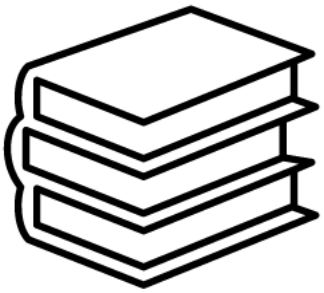
Executive Summary

Highlights

- Webster Cannabis Company LLC., hereinafter referred to as the "Company" (the "Company") is seeking to obtain a Marijuana Adult Recreational Retail license in Webster Massachusetts.
- Webster Cannabis Company LLC is expected to generate the following tax revenue streams:
    - Tax revenue streams to Town (Local 3% and HCA 3%): $28,584 in 2022, $257,436 in 2024, and $262,800 in 2025.
    - Tax revenue streams to State (Cannabis Excise Tax 6.25% and State Sales Tax 3%): $44,067 in 2024, $396,880 in 2025, and $405,150 in 2026.
- The company has already received a Host Community Agreement from the Webster, MA.
- Assuming all licenses and permits are granted, It is expected that the management team will have the facility operational by May 2024.

4 Town Forest Road, Webster MA

- Management has secured a lease for a 3,250 Sq. Ft building strategically located at 4 Town Forest Road in Webster, Massachusetts.
- This facility is equipped with a total of 25 parking spaces out of which 5 will be for employees and 20 for dispensary customers.



Market Size and Opportunity

In September 2019, the Cannabis Control Commission approved new regulations for Massachusetts' use of cannabis programs that introduced new license types; cannabis dispensaries, cannabis cafes and home delivery.

BDS Analytics conducted a market research study in 2019. BDS Analytics predicted that Massachusetts' marijuana market would reach $1.35 billion in 2024. Cannabis sales has exceeded $2 billion as November of 2021.

According to official data, there are currently 165 licensed dispensaries in Massachusetts, and another 201 have received provisional or final license approvals and are completing inspections. A total of 688 licensed marijuana establishments including cultivators, product manufacturers, testing labs, and others, are operational in Massachusetts.

Target Market

The company's target market will be end consumers who have demonstrated that they are above the age of 21, for recreational marijuana use in Massachusetts.

According to a recent study from the Massachusetts Department of Health, 21% of adults in the state use Marijuana regularly within 30 day intervals.[1] The company hopes to capture this target market with a conservative end consumer population estimate of 2,300 in Webster.

[1] https://www.mass.gov/files/documents/2018/06/29/DPH%20Legislative%20Report%20-%20Marijuana%20Baseline%20Health%20Study.pdf

Executive Summary

Management Team

Webster Cannabis Company LLC Executive Management Team has extensive experience in marijuana licensing, compliance, and technology development. All leaders have demonstrated capable experience as well as a history of managing large, successful organizations and is currently structured as follows:

Gary Baldyga

Gary has been the Chief Executive Officer of Cannabis of Worcester LLC since September of 2022 and has turned that store into one of the most popular in the Worcester area. Gary is local to Webster and eager to bring a successful, promising business to his childhood home.

Stephen Bowman

Stephen has been an industry standout managing multiple large and middle market retails for over 20 years. Stephen has been managing Cannabis of Worcester as the Chief Operations Officer since September of 2022. He looks forward to conquering the next milestone.

Proposed Timeline for Achieving Operation

A proposed timeline for achieving operation of the Marijuana Establishment and evidence that the Marijuana Establishment will be ready to operate within the proposed timeline after notification by the Commission that the applicant qualifies for licensure.

Proposed Timeline of Operations

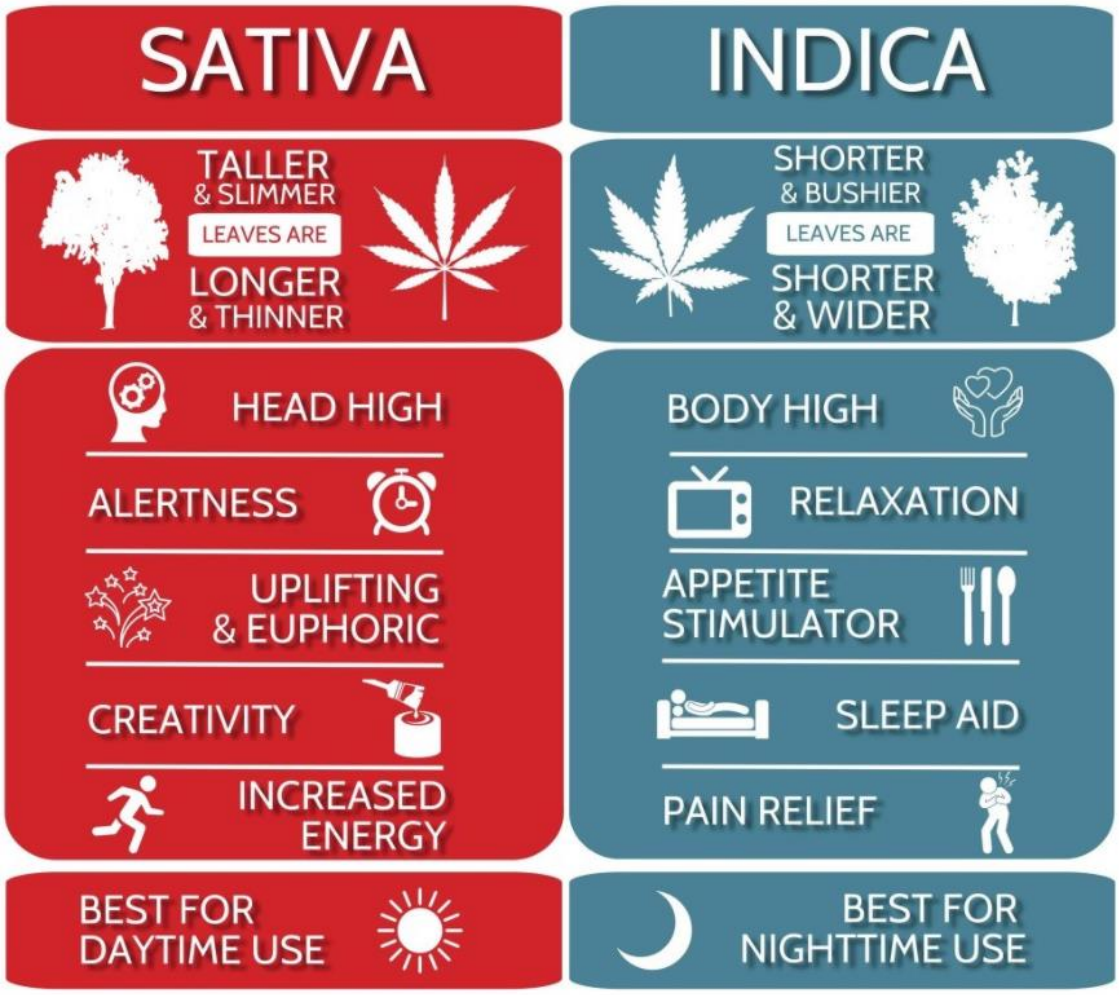
Operational Activities	Date(s)
Receive Host Community Agreement	November 2023
Submit CCC Application	November 2023
Receive Provisional License	January 2024
Receive Special Permit	January 2024
CCC Architectural Review	January 2024
Build out Begins	February 2024
Submit Agent Registration Applications to the CCC	February 2024
CCC Post-Provisional Inspection	March 2024
CCC Approval – Monthly Meeting Agenda	April 2024
CCC Final Inspection	April 2024
Career & Hiring Fair	April 2024
Staff Training	May 2024
Commencement to Operate from the CCC	May 2024

Products

The company will purchase products wholesale from licensed Marijuana cultivators and Product Manufacturing. The main focus of products will be top tier Marijuana Flower that tests above 30% Total Active Cannabinoids (TAC). Additional products such as Vape Carts, Edibles, and Concentrates will also be stocked, but at lower rates.

The management team has spent years cultivating and developing these wholesale reltationships to ensure products such as Marijuana Flower, Vape Carts, Edibles, and Concentrates are sourced at the best possible prices.

Marijuana Flower



The company will carry a plethora of Indica and Sativa strains. Sativa strains tend to be in a greater demand with the consumer base, however they can be harder to source.

Vapes and Concentrates

Vaping products and Marijuana Concentrates have been growing in popularity amongst consumers as they are a quick and discreet method of dosing.

Usage devices specifically designed for these marijuana products will be sold at a 100% markup rate. Licenses are not required for the production of Vaping devices, therefore Management will source these devices an extremely low cost from wholesale suppliers overseas.

Edibles

The management team has developed relationships with North Eastern Alternatives and received a consignment agreement for all edibles and vape products. This significantly reduces the amount of capital required upfront for product stocking costs.

Market Analysis

Massachusetts Cannabis Market Size

In September 2019, The Cannabis Control Commission approved new regulations for Massachusetts' use of cannabis programs that introduced new license types- cannabis cafes and home delivery.

As of January 2012, 724 licenses have been awarded, including 298 retailers, 221 cultivator, 170 manufacturer, 17 microbusiness, 9 transporter and 9 testing licenses according to the official data. The review process includes a background check and 60-day window during which the municipality in which the business hopes to locate must certify that the applicant has met all the local requirements.

Cannabis stores sold about $9.3 million worth of cannabis products during the first month and in December 2019 total legal cannabis sales exceeded $460 million, according to figures released by the Cannabis Control Commission.

As of March 2020, the total retail sales have reached almost $896 million. According to the Department of Revenue analysis, in the first 12 months of the program, the Massachusetts cannabis market could expect to see between $45 million and $83 million in tax revenue from the sale of recreational cannabis, with an estimated $64 million in the middle of that range. In the second year, Massachusetts could expect tax revenue between $93 million and $172 million, on sales ranging between $707 million and $1.3 billion. Research from multiple cannabis data and investment firms predict that Massachusetts can become a travel destination.

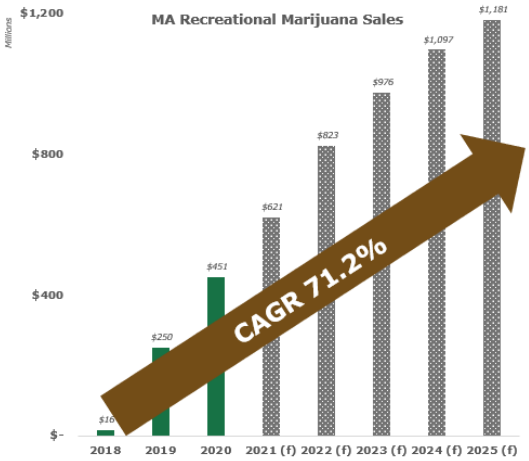
From January 1, 2020 to December 31, 2020, Marijuana establishments generated about $700 million in gross sales despite two months of closures due to COVID-19.

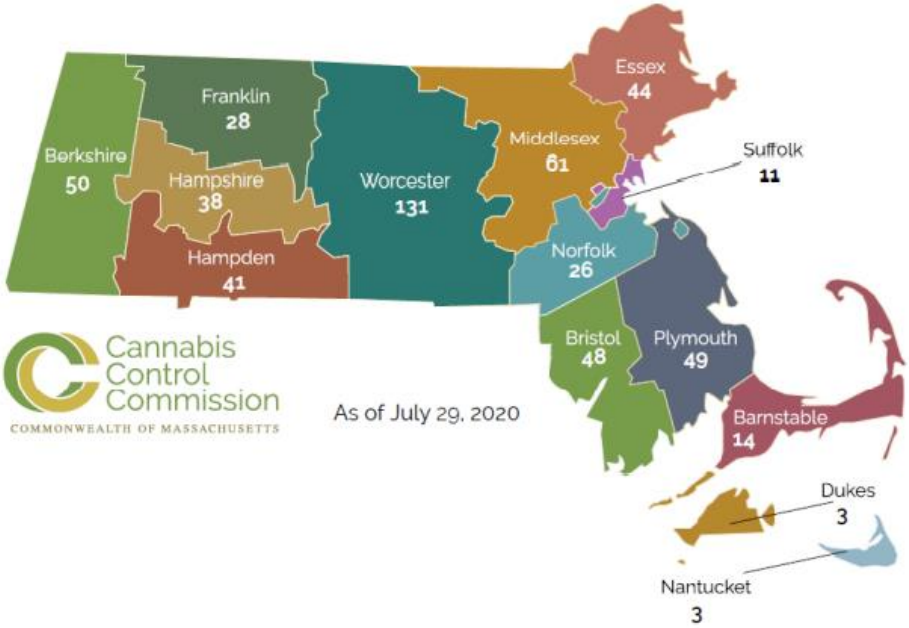
It is expected over 700,000 customers potentially interested in using recreational cannabis and adult-use cannabis market in Massachusetts is projected to become a $1 billion industry by 2021.

Massachusetts Market

Recreational Marijuana CAGR of 71% to 2025

6.9Mn Population	**5.3%** Population Growth	**81%** Population Over 18
$77.3k Median HH Income	**$41.8** Per Capita Income	**$596Bn** GDP (2019)





Demand Determinants

Income and demographics: Household income is a main driver of a consumers' ability to acquire cannabis products. The legalization of cannabis, in some states, has created a market for high-quality cannabis products, which can be expensive.

Government Regulation: Demand for cannabis growing industry products is primarily determined by government regulation. The federal government regulates cannabis as a Schedule I controlled substance and considers all cannabis cultivation, sale and consumption illegal. In states that lack laws legalizing the use of cannabis, cannabis use is explicitly prohibited. However, 33 states across the United States and Washington, DC, have some level of legalization of cannabis.

2

Figure 1

Target Market

The Company's Target Market will be end consumers for recreational use in the state of Massachusetts.

Based on market research, the median age of recreational cannabis customers is 34.6 years. While the above segment will be the primary target, the secondary target includes those in the 21-to-30 age group, as they represent the next wave of active product consumer.

Demand Determinants

Income and Demographics

Household income is the primary driver of a consumers' ability to acquire cannabis products. The legalization of cannabis, in some states, has created a market for high-quality cannabis products, whichcan be expensive.

Moreover, since cannabis is typically not covered under health insurance plans, demand is mainly dependent on customer's income levels. Population demographics, particularly age, also dictate demand trends for cannabis use.

Changing societal norms have made cannabis use much more acceptable today.

Government Regulation

Demand for cannabis growing industry products is primarily determined by government regulation. Thefederal government regulates cannabis as a Schedule I controlled substance and considers all cannabiscultivation, sale, and consumption illegal.

However, nearly every state and the District of Columbia have enacted some form of decriminalization or legalization at this point

Branding and Marketing

While remaining in compliance with Massachusetts Law regarding Cannabis-related marketing and advertising campaigns, Management expects marketing will be conducted through the following approved channels:

Print : Advertising and articles in thematic magazines such as Cannabis, Dope, and Cannabis Venture;

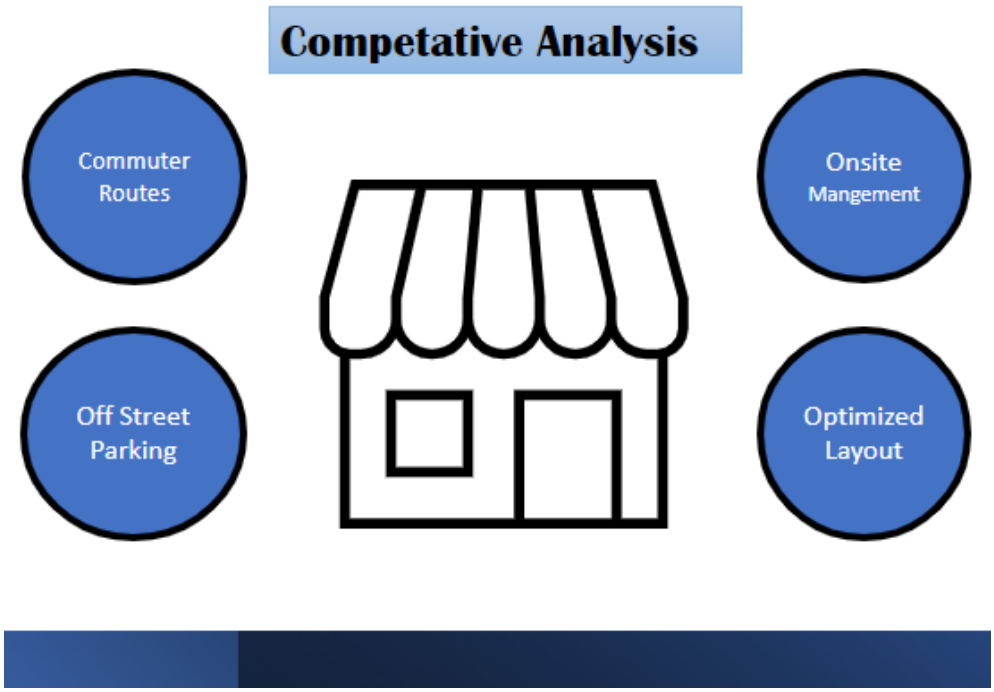
Networking & Word- of- mouth: Not only as a low-cost means raise awareness of the Company's products and positioning, but as a vital role in remaining in touch with the community;

Direct Sales & Affiliate Marketing: Through an in-house sales team to market the Company's products

Competitive Analysis

Based on Management's analysis of current market conditions, the following is an overview of theCompany's competitive advantages.

- Strategic Location with nearby access to Connecticut;
- High-quality products at a highly competitive price;
- Disciplined and competent management team;
- Standard Operating Procedures including, but not limited to, state of the art POS and InventoryManagement Systems;
- Implementation of Cannabis Industry Best Practices to manage both strategic and day-to-daybusiness operations.



SWOT Analysis

The following is an overview of the Company's key Strengths, Weaknesses, Opportunities, and Threats, incumbent with an industry lacking Federal oversight and a long lead time for licensing.

SWOT

Strengths

- Strategic Location
- Growth Potential
- Quality Wholesale Relationships
- Experienced Mangement Team

Weaknesses

- No Federal Scope
- Initial Marketing Timeline
- Small Inventory Room will Require Adaptable Team Members

Opportunities

- Growth in Popularity and Demand
- Accelerated Customer Growth
- Access to New Hampshire Market
- No Rec Competitors in Town

Threats

- Lack of Verticle Integration
- Increased Competition in 5 Years
- Health Crisis Disrupts Market Activity

RESTRICTING ACCESS TO AGE 21 AND OLDER

OBJECTIVE

Webster Cannabis Company LLC is committed to remaining compliant with the regulatory guidelines detailed in 935 CMR 500.105(8) et. seq. ("the Regulations") and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission ("CCC") or any other regulatory agency.

Webster Cannabis Company LLC has developed the following procedures using industry best practices and will continue to update this document as regulations, guidance, and best practices evolve.

ACCESS TO THE FACILITY

Webster Cannabis Company Management team is responsible for ensuring that all persons who enter the facility or are otherwise associated with the operations of Webster Cannabis Company are over the age of 21.

The Webster Cannabis Company facility, located at 4 Town Forest Road in Webster, allows only the following individuals access to our facility. For the purposes of this Policy the term facility also refers to any vehicle owned, leased, rented or otherwise used by Webster Cannabis Company for the transportation of Marijuana:

1. Webster Cannabis Company Agents (including board members, directors, employees, executives, managers, or volunteers)
2. While at the facility or transporting marijuana for the facility all Webster Cannabis Company Agents must carry their valid Agent Registration Card issued by the Commission
3. All Webster Cannabis Company Agents are verified to be 21 years of age or older prior to being issued a Marijuana Establishment Agent card.
4. Customers/Consumers (Note: All Agents will be trained in the Verification and Identification of individuals)

To verify a customer is 21 or older a Webster Cannabis Company Agents must receive and examine from the customer one of the following authorized governments issued ID Cards;

a. Massachusetts Issued driver's license
b. Massachusetts Issued ID card
c. Out-of-state driver's license or ID card (with photo)
d. Passport
e. U.S. Military I.D.

To verify the age of the customer the Agent will use an Age Verification Smart ID Scanner that will be supplied by Webster Cannabis Company.

In the event that the ID is not a scannable ID, or if for any reason the scanner is not operational or available of if the ID is questionable the Agent must use the **FLAG** methodology of ID verification

1. **F**. Feel

    - Have the customer remove the ID from their wallet or plastic holder (never accept a laminated document)
    - Feel for information cut-out or pasted on (especially near photo and birth date areas)

- Feel the texture – most driver's license should feel smooth, or (depending on your State) they will have an identifying texture

2. **L.** Look

- Look for the State seals or water marks; these seals are highly visible without any special light.
- Look at the photograph. Hairstyles, eye makeup and eye color can be altered, so focus your attention on the person's nose and chin as these features don't change. When encountering people with beards or facial hair, cover the facial hair portion of the photo and concentrate on the nose or ears.
- Look at the height and weight. They should reasonably match the person.
- Look at the date of birth and do the math!
- Compare the age on the ID with the person's apparent age.
- Look at the expiration date. If the ID has expired, it is not acceptable.
- If needed, compare the ID to the book of Government Issued IDs

3. **A.** Ask

- Ask questions of the person, such as their middle name, zodiac sign, or year of high school graduation. Ask them the month they were born. If they respond with a number, they may be lying. If the person is with a companion, ask the companion to quickly tell you the person's name.
- If you have questions as to their identity, ask the person to sign their name, and then compare signatures.

4. **G.** Give Back

- If the ID looks genuine, give the ID back to the customer and allow entry.

If for any reason the identity of the customer or the validity of the ID is in question, do not allow the customer to enter the facility.

Visitors (including outside vendors and contractors)

Prior to being allowed access to the facility or any Limited Access Area, the visitor must produce a government issued Identification Card to a member of the management team and have their age verified to be 21 years of age or older.

If there is any question as to the visitor's age, or if the visitor cannot produce a Government Issued Identification Card, they will not be granted access.

After the age of the visitor is verified, they will be given a Visitor Identification Badge. Visitors will be escorted at all times by a marijuana establishment agent authorized to enter the limited access area.

Visitors will be logged in and out of the facility and must return the Visitor Identification Badge upon exit.

The visitor log will be available for inspection by the Commission at all times. Access will be granted to the Commission, Emergency Responders and Law Enforcement.

Additional Access to Facility

The following individuals will have access to a Marijuana Establishment or Marijuana Establishment transportation vehicle:

1. Representatives of the Commission in the course of responsibilities authorized by St. 2016, c. 334, as amended by St. 2017, c. 55;
2. Representatives of other state agencies of the Commonwealth; and
3. Emergency responders in the course of responding to an emergency.
4. Law enforcement personnel or local public health, inspectional services, or other permit-granting agents acting within their lawful jurisdiction.

Individuals described above in this policy will be granted immediate access to the facility.

TRAINING

Webster Cannabis Company will train all Agents on the verification and identification of individuals. This training will be done prior to Agents performing age verification duties. Management will supply Age Verification Smart ID Scanners and hardcover books to assist Agents in age verification. At no time will anyone be allowed access to the facility if their identification or the validity of their government issued ID is in question.

REVISION HISTORY

Version	Date	Comment
1.0	November 28, 2023	Created by Casey Nothe
1.1		

RECORD KEEPING PROCEDURES

OBJECTIVE

Webster Cannabis Company is committed to remaining compliant with the regulatory guidelines detailed in 935 CMR 500.105(8) et. seq. ("the Regulations") and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission ("CCC") or any other regulatory agency.

REQUIREMENTS

Webster Cannabis Company will ensure records of a Marijuana Establishment will be available for inspection to the Commission, on request. The financial records of a Marijuana Establishment will be maintained in accordance with generally accepted accounting principles. Written records that are required and are subject to inspection include, but are not necessarily limited to, all records required in any section of 935 CMR 500.000, in addition to the following:

a. Written Operating Procedures

b. Inventory Records

c. Seed-to-sale SOR Electronic Tracking System records for all Marijuana Products

When operating procedures are changed, a copy of the updated operating procedures will be forwarded to the Lead Investigator within 5 business days.

PERSONNEL RECORDS

Webster Cannabis Company Centre maintains personnel records for each employee in accordance with 035 CMR 500.105 (9) (d). The following documents are included in personnel records:

a. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions

b. A personnel record for each Marijuana Establishment Agent. Such records will be maintained for at least 12 months after termination of the individual's affiliation with the marijuana establishment and will include, at a minimum, the following:

1. All materials submitted to the commission pursuant to 935 CMR 500.030(2)
2. Documentation of verification of references
3. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision
4. Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters
5. Documentation of periodic performance evaluations
6. A record of any disciplinary action taken; and
7. Notice of completed Responsible Vendor Training Program and in-house training for Marijuana Establishment Agents

Webster Cannabis Company Centre will maintain a staffing plan that will demonstrate accessible business hours.

Personnel policies and procedures will include the following:

a. Code of ethics

b. Whistle-blower policy

c. A policy which notifies persons with disabilities of their rights under https://www.mass.gov/service-details/about-employment-rights or a comparable link, and includes provisions prohibiting discrimination and providing reasonable accommodations;

Webster Cannabis Company Centre will ensure that 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).

BUSINESS RECORDS

Webster Cannabis Company Centre will maintain business records. These records will include manual and computerized records of:

a. Assets and liabilities

b. Monetary Transactions

c. Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers

d. Sales records, including the quantity, form, and cost of marijuana products

e. Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over the marijuana establishment

f. Waste disposal records

Following a closure of Webster Cannabis Company Centre, all records will be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission.

RECORDING SALES

Webster Cannabis Company Centre will ensure that sales are recorded.

Webster Cannabis Company Centre utilizes a Point-Of-Sale (POS) system approved by the Commission in consultation with the DOR. This POS system is Flowhub. This sales recording module is approved by the DOR.

Webster Cannabis Company Centre is prohibited from utilizing software or other methods to manipulate or alter sales data.

A Monthly analysis will be conducted of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data.

The records demonstrating that Webster Cannabis Company Centre has performed the monthly analysis will be maintained and produced upon request to the Commission.

If Webster Cannabis Company Centre 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, then:

1. It will immediately disclose the information to the Commission
2. It will cooperate with the Commission in any investigation regarding manipulation or alteration of sales data
3. Take such other action directed by the Commission.

Webster Cannabis Company Centre will comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements. Separate accounting practices will be adopted at the point of sale for Marijuana and Marijuana Product sales, and non-Marijuana sales.

Webster Cannabis Company Centre will ensure the Commission and DOR may audit and examine the point-of-sale system used by a retailer in order to ensure compliance with Massachusetts tax laws.

REVISION HISTORY

Version	Date	Comment
1.0	November 29, 2023	Created by Casey Nothe

MAINTENANCE OF FINANCIAL RECORDS

OBJECTIVE

Webster Cannabis Company is committed to being compliant with all regulations outlined in 935 CMR 500.000 et. seq. ("the Regulations") and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission ("CCC" or "the Commission") or any other regulatory agency.

REQUIREMENTS

Records of the Marijuana Establishment will be available for inspection to the Commission, on request. The financial records of a Marijuana Establishment will be maintained in accordance with generally accepted accounting principles.

Webster Cannabis Company has established procedures for safe cash handling and cash transportation to financial institutions to prevent theft, loss and associated risks to the safety of employees, customers and the general public. These procedures are found in the Transportation and Cash Handling Standard Operating Procedures (SOP).

Webster Cannabis Company has created, installed, and trained Agents on all Standard Operating Procedures.

Webster Cannabis Company will conduct Financial Record Keeping training with all Agents and employees.

Accurate training records will be maintained.

Webster Cannabis Company will communicate and supply Financial Records to the CCC when requested.

Financial Records will be maintained in accordance with Generally Accepted Accounting Principles (GAAP).

Webster Cannabis Company will ensure to communicate and collaborate with external Accountants and Tax Professionals to ensure proper accounting compliance.

Webster Cannabis Company will maintain all Financial/Business records in hard copy and electronic format.

If an operating procedure has changed or been amended, a copy of the updated operating procedures will be forwarded to the Lead Investigator within 5 business days.

The Financial Records will include but is not limited to:

- Assets and Liabilities
- Monetary Transactions

Books of accounts which will include:

- Journals
- Ledgers
- Supporting documents

- Agreements
- Checks
- Invoices
- Vouchers

Sales Records including:

- The quantity
- Form
- Cost of Marijuana Products
- Salary and wages paid to each employee
- Stipend(s) paid to each board member
- Any executive compensation
- Bonus(es), benefits, or any item(s) of value paid to any individual affiliated with Webster Cannabis Company., including members of the nonprofit corporation, if any.

On an annual basis, Webster Cannabis Company will engage the services of an Independent Certified Public Accountant (CPA) who is experienced with the Marijuana industry, to conduct a Financial Audit of all financial records and documents

COMMISSION ACCESS TO FINANCIAL RECORDS

Webster Cannabis Company will supply electronic and hard copy (written) Financial Records to the CCC upon request.

The Financial Records will be maintained in accordance with GAAP.

All written records required in any section of 935 CMR 500.000 are subject to inspection by the CCC.

Webster Cannabis Company prohibits the use of software or other methods to manipulate or alter sales data.

Webster Cannabis Company will 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 Webster Cannabis Company determines that software or other methods have been installed or utilized to manipulate or alter sales data, Webster Cannabis Company will immediately disclose the information to the CCC, cooperate in any investigation, and take such other actions as directed by the CCC.

Webster Cannabis Company will comply with 830 CMR 62C .25.1: Record Retention and DOR Directive 16-1 regarding record keeping requirements.

Separate accounting practices at the Leaf Logix Point of Sale (POS) have been established for marijuana and non-marijuana sales.

Department of Revenue (DOR) Access to Financial Records

All Webster Cannabis Company Financial Books, Records, Papers and other Financial Data will be made available to the DOR upon request. Accounting records and information in electronic format will be provided in a searchable electronic format as requested by the DOR. Any additional reports and schedules relating to the preparation of tax returns will be maintained and made available upon request.

Inventory system data, purchase reports, schedules or documentation that reconciles to other Financial Books and Records will be maintained and made available to the DOR upon request.

Purchases Journals and General Ledgers will be maintained and made available to the DOR upon request.

These records will be kept so long as their contents are material in the administration of Massachusetts tax laws.

All Financial Records will be preserved until the statute of limitations for making additional assessments for the period of which the return was due has expired.

The DOR may require a longer retention period, such as when the records are the subject of an audit, court case, or other proceeding.

In this event, all Financial Records will be preserved in accordance with the guidance provided by the DOR.

Webster Cannabis Company will comply with all records retention requirements outlined in the DOR Regulations including but not limited to 830 CMR 62C.25.1: Record Retention.

REVISION HISTORY

Version	Date	Comment
1.0	November 29, 2023	Created by Casey Nothe

QUALIFICATIONS AND TRAINING POLICY

OBJECTIVE

Webster Cannabis Company is committed to remaining compliant with the regulatory guidelines detailed in 935 CMR 500.105(8) et. seq. ("the Regulations") and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission ("CCC") or any other regulatory agency.

QUALIFICATIONS FOR WEBSTER CANNABIS COMPANY MARIJUANA ESTABLISHMENT AGENT

The minimum requirements to become a Webster Cannabis Company Marijuana Establishment Agent ("Agent") are outlined below. All Webster Cannabis Company board members, directors, employees, executives, managers or volunteers will register with the Commission as an Agent. For clarity an employee means, any consultant or contractor who provides on-site services to a Marijuana Establishment related to the cultivation, harvesting, preparation, packaging, storage, testing, or dispensing of marijuana.

All Webster Cannabis Company Agents must;

1. Be 21 years of age or older;
2. Not been convicted of an offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority; and
3. Be determined suitable for registration consistent with the provisions of 935 CMR 500.800 and 500.802.

Webster Cannabis Company will develop a job description for all positions with the company. While all Agents must meet the qualifications listed above, several of our positions will require additional qualifications depending on the required duties.

REQUIRED TRAINING FOR AGENTS

Webster Cannabis Company will ensure all Webster Cannabis Company Agents complete training prior to performing job functions. Training will be tailored to the role and responsibilities of the job function.

1. Our initial training begins during employee orientation where all new employees will be issued their employee handbook. Classroom or online training on this day will include, but not be limited to;

a. Code of Conduct;

b. Verifying Identifications;

c. Marijuana Regulations;

d. Security and Safety;

e. Emergency Procedures/Disaster Plan;

f. Diversion of Marijuana;

g. Terminatable Offenses;

h. Confidential Information;

i. Employee Policies (all employee policies from the handbook will be covered) including but not limited to;

i. Alcohol, smoke and drug-free workplace;

ii. Equal Employment Policy;

iii. Anti-Harassment and Sexual Harassment Policy;

iv. Americans with Disability Act;

v. Employee Assistance Policy; and

vi. Diversity Plan

1. After the initial training is complete agents will be trained on job specific areas depending on their duties. This training can be done in a classroom setting, online or computerized, on the job training ("OJT") or through external training platforms.

1. All Webster Cannabis Company Centre Agents will receive a minimum of 8 hours of training annually.

1. Webster Cannabis Company will record, maintain and store 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. These records will be stored in the Agents Personnel File. Training records will be retained by Webster Cannabis Company Centre for at least one year after agents' termination.

1. Webster Cannabis Company will require all of its Agents to attend and complete a Responsible Vendor Training Program to become designated as a "responsible vendor".

a. After the responsible vendor designation is applied each Webster Cannabis Company owner, manager, and employee involved in the handling and sale of marijuana for adult use will successfully complete the program once every year thereafter to maintain designation as a "responsible vendor."

b. Although administrative employees who do not handle or sell marijuana are not required to take the responsible vendor program, Webster Cannabis Company will allow and encourage them to attend on a voluntary basis.

c. Webster Cannabis Company will maintain records of responsible vendor training program compliance for four years and make them available for inspection by the Commission and any other applicable licensing authority upon request during normal business hours.

ADDITIONAL TRAINING

Webster Cannabis Company will provide training and training opportunities to its employees. In addition to required training, Webster Cannabis Company will encourage advanced training to our employees in the areas of Safety and Security, Marijuana Science or other areas then enhance the Company's, our Agents and our customers safety and shopping experience.

REVISION HISTORY

Version	Date	Comment
1.0	November 29, 2023	Created by Casey Nothe

Energy Efficiency and Compliance

Webster Cannabis Company has drafted the following procedures. This plan will be updated annually as new energy audits are conducted and opportunities are identified.

Identification of Potential Energy Reduction Opportunities

Webster Cannabis Company has coordinated with Green Collar, a Mass Save partner for the identification of potential energy use reduction opportunities (including, but not limited to, natural lighting, heat recovery ventilation, and energy efficiency measures).

Further opportunities to establish renewable energy generation will continue to be considered as the company seeks to reduce the operational energy demand.

A copy of this report will be saved and available for the Commission upon request.

Opportunities for renewable energy generation

Webster Cannabis Company has considered opportunities for renewable energy generation. At this time the Property Owner was not comfortable with adding a solar roofing investment or any other energy generation technique. Webster Cannabis Company will continue to look for energy generation opportunities to present to the Landlord when they become more feasible.

Strategies to reduce electric demand

Webster Cannabis Company has developed strategies to reduce electrical demand. All employees will be trained that lights and electrical loads will be shut off at the closing of the store unless they are necessary for operational function. This training will be documented in accordance with the Webster Cannabis Company Qualifications and Intended Trainings policy and procedures.

Motion sensors have been installed that will shut off lights and fans if there is no movement in the area.. These lights are operated in conjunction with timers to limit electrical waste.

Engagement with Energy Efficiency Programs

Webster Cannabis Company's commitment to energy conservation will extend to further partnership and engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, & 21. Audits will be conducted regularly and when equipment needs to be repaired or replaced.

These collaborations will ensure that the implementation of such strategies and plans exceeds all standards set forth by the CCC and Massachusetts Energy Standards.

REVISION HISTORY

Version	Date	Comment
2.0	November 29, 2023	Created by Casey Nothe

QUALITY CONTROL AND PRODUCT TESTING

OBJECTIVE

Webster Cannabis Company is committed to remaining compliant with the regulatory guidelines detailed in 935 CMR 500.160 et. seq. ("the Regulations") and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission ("CCC") or any other regulatory agency.

RESPONSIBILITY

Webster Cannabis Company will:

Maintain and Update all Standard Operating Procedures (SOPs) for the Inventory of Marijuana and MIPs and the Webster Cannabis Company Inventory Binder.

Conduct Inventory of Marijuana and MIPs training with all Agents and employees.

Maintain accurate training records.

Initiate regular Quality Control and Sanitation Cleaning Schedules.

Conduct regular Quality Control and Sanitation Inspections and Audits.

Ensure that all Marijuana and MIPs have been tested.

Communicate with the CCC in the event of a batch test failure.

Develop, distribute, and enact Plans of Corrective Action when necessary.

Ensuring that only the leaves and flowers of the female marijuana plant are processed accordingly in a safe and sanitary manner as prescribed below:

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

Any agent working in direct contact with marijuana shall conform to sanitary practices while on duty, including:

- Maintaining adequate personal cleanliness; and
- Washing hands appropriately.

There shall be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations.

Floors, walls, and ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair.

Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination.

The establishment shall notify the Commission within 72 hours of any laboratory testing results indicating contamination if contamination cannot be remediated and disposal of the production batch is necessary.

General Requirements

Webster Cannabis Company will maintain Quality Control in accordance with:

935 CMR 500.000 et. seq, 105 CMR 590.000: Minimum Sanitation Standards for Food Establishments Sanitation requirements in accordance with 105 CMR 500.000: Good Manufacturing Practices for Food

Food Handling requirements specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine.

All Webster Cannabis Company Marijuana and MIPs will have been tested prior to sale to consumers. All testing records will be stored with the Certifications of Analysis located in the Webster Cannabis Company Inventory Control Binder.

No Marijuana or MIPs may be sold or marketed that are not capable or have not been tested by Independent Testing Laboratories.

Any testing results indicating noncompliance with M.G.L. c.132B and the regulations at 333 CMR 2.00 through 333 CMR 14.00 will be immediately reported to the Cannabis Control Commission, who may refer any such result to the Massachusetts DPH of Agricultural Resources.

Webster Cannabis Company will not sell or transfer MIPs with potency levels exceeding the following, as tested by an independent marijuana testing facility licensed in accordance with M.G.L. c. 94G, § 15:

> For a single serving of an edible marijuana products, five milligrams of active tetrahydrocannabinol (THC)
>
> In a single package of multiple edible marijuana products to be eaten, swallowed, or otherwise ingested, not more than 20 servings or 100 milligrams of active THC.
>
> The THC content must be homogenous, or evenly distributed throughout the edible marijuana products.

Sanitation

Webster Cannabis Company will maintain the cleanliness of the dispensary and Marijuana and MIP storage locations. Webster Cannabis Company Agents will utilize the Webster Cannabis Company Cleaning Checklist each shift to ensure that all facets of sanitation are maintained.

Agents will utilize cleaning disinfectant to wipe down and ensure that all Marijuana and MIP storage locations and contact surfaces are clean. Agents will utilize disinfectant to clean the walls, ceilings, and floors of all Marijuana and MIP storage and packaging areas.

Agents will use a sanitizing disinfectant to wipe down and clean all product preparation surfaces such as:

- Tables
- Scale surfaces
- Utensils

Hand-washing facilities will be adequate and convenient and will be furnished with running water at a suitable temperature. Effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices will be provided.

Each of the facility's water supplies comes from the municipal water supply and is sufficient for necessary operations.

Webster Cannabis Company plumbing will be of adequate size and design, and satisfactorily installed and maintained to carry enough quantities of water to the required locations throughout the facility. Plumbing will properly convey sewage and liquid disposable waste from the facility. There will be no cross-connections between the potable and wastewater lines.

The facility will provide its employees with adequate, readily accessible toilet facilities that will be maintained in a sanitary condition and in good repair.

Contamination Control

All Webster Cannabis Company Agents will be trained on:

- Pest Prevention
- Pest Detection
- Pest Treatments

This training will be documented and recorded in employee personnel files and Inventory Control Training Logs. Records of the training will be documented in the Inventory Control Binder.

When a Contamination or Possible Contamination Incident is detected, the witnessing Agent will:

- Document and record the event on an Incident Report
- Notify the General Manager of the Incident
- Conduct primary mitigating risk procedures (i.e., utilize pest control traps)

After the General Manager has been alerted of Contamination or Possible Contamination, the General Manager will:

- Conduct an investigation within 24 hours
- Create a plan of action to correct the deficiency
- Notify the Board of Health
- Alert the CCC in writing
- Create a follow up After Action Review on the Contamination Incident

Pest Control Traps

Webster Cannabis Company will utilize small, sticky traps for monitoring of flying or airborne pests.

All Pest Control traps will be posted, mapped, and the information disseminated to the Webster Cannabis Company staff.

Handling and Storage of Marijuana, MIPs, and Marijuana Plant Waste

All marijuana plant waste will be placed in the hermetically sealed “Marijuana Waste” container. This waste container is known as the “Products Designated for Wasting/Destruction” Bin. This container is impervious and covered.

Handling and Storage of Non-Marijuana Waste

All non-marijuana waste will be placed into the appropriate impervious covered waste receptacles:

- Recyclable
- Organic
- Solid waste

At the end of each shift these containers will be emptied, the contents removed from the building, and placed in the appropriate containers to await pickup. All toxic materials including cleaning compounds, sanitizers, etc. will be stored in an area away from marijuana storage areas.

All chemicals, products, and mixtures will contain Material Safety Data Sheets (MSDS).

The MSDS is located in the Inventory room of the Webster Cannabis Company Facility.

PERSONNEL

All Agents and contractors are obligated and instructed to notify Webster Cannabis Company management in the event that they have developed an illness or medical condition that may interfere with Quality Control.

All Agents or contractors will be excluded from daily operations who have been medically examined or observed to have:

Any diseases transmissible through food
Illness
Open lesion(s)
Boils
Sores
Open wounds
Infected wounds
Vomiting
Diarrhea
Flu-like symptoms
or any other abnormal source of microbial contamination

Personnel will not be able to return to daily operational activities until the condition has been corrected.

Webster Cannabis Company will voluntarily comply with any and all isolation and/or quarantine orders issued by the Local Board of Health or the Department of Public Health. If isolation/quarantine orders are issued by the Board of Health or the Department of Public Health, the General Manager will:

- Conduct and follow through on the isolation/quarantine immediately
- Draft and distribute a memorandum of understanding for the isolation/quarantine order
- Train all employees within 48 hours of the isolation/quarantine order
- Conduct an AAR on the isolation/quarantine order

All Webster Cannabis Company Agents will adhere to proper sanitary practices while conducting operational activities including:

Grooming
Maintain clean hair
Teeth brushed
Showered
Usage of deodorant daily
Maintain short, clean, and polish-free fingernails

Webster Cannabis Company Agents will wash their hands thoroughly with soap and warm water for a period of 45 seconds:

- Upon entry to the facility
- After utilizing the restroom
- After touching face, nose, hair, or any other body part
- After sneezing or coughing
- After cleaning duties.
- After eating or drinking.
- Any other time an unsanitary task has been performed

All Webster Cannabis Company Agents will ensure that they are dressed in proper work attire. Agents will:

- Wear appropriate clothing
- Wear clean uniforms with sleeves
- Wear clean non-skid close-toed work shoes (or tennis shoes)

All Webster Cannabis Company Agents will properly maintain and dress any cuts, abrasions, and burns by:

- Bandaging any cut, abrasion, or burn that has broken the skin.
- Covering bandages on hands with gloves and finger cots and change as appropriate.
- Informing supervisor of all wounds.

Webster Cannabis Company maintains a strict no smoking policy. No smoking or smokeless tobacco is to be used or ingested on company premises.

Quality Control Training

Webster Cannabis Company will train all employees on Quality Control procedures during the onboarding process.

Training topics will include:

- Good Manufacturing Practices
- Sanitation
- Pest Control
- Product safety training
- Requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements

This training will be documented and recorded in employee personnel files and Inventory Control Training Logs. Records of the training will be documented in the Inventory Control Binder.

Hazard Analysis and Critical Control Point (HACCP)

Webster Cannabis Company will implement a HACCP plan in accordance with the HACCP Principles & Application Guidelines issued by the FDA. This HACCP plan will address packaging of all marijuana products that will take place in the facility.

Once operational Webster Cannabis Company will:

- Assemble the HACCP team (General Manager, Supervisors, and outside consultants)
- Describe the product and its distribution
- Describe the intended use and consumers of the product

- Develop a flow diagram which describes each process
- Verify the flow diagram
- Conduct a hazard analysis for each product (Principle 1)
- Determine critical control points (CCPs) for each product (Principle 2)
- Establish critical limits (Principle 3)
- Establish monitoring procedures (Principle 4)
- Establish corrective actions (Principle 5)
- Establish verification procedures (Principle 6)
- Establish record-keeping and documentation procedures (Principle 7)

Testing of Marijuana and MIPs

Webster Cannabis Company will only sell Marijuana and MIPs that have been tested and passed by an independent testing laboratory.

These testing records will be stored and maintained pursuant to our Records Retention Policy and Procedure.

Required testing includes:

- Cannabinoid Profile
- Contaminants as specified by the Department including, but not limited to:
- Mold
- Mildew
- Heavy metals
- Plant-Growth Regulators and Pesticides that are compliant with M.G.L. c. 132B and the regulations promulgated at 333 CMR 2.00 through 333 CMR 14.00.
- Bacteria
- Fungi
- Mycotoxins

Webster Cannabis Company will maintain the results of all testing for no less than two (2) years. These testing results can be found in the Webster Cannabis Company Inventory Binder.

Reporting to the CCC

If a marijuana product fails the laboratory testing, it will be quarantined and stored away from other products. If a marijuana product fails, the laboratory testing the CCC will be notified immediately by the Webster Cannabis Company General Manager.

If through a re-test of the product, it is determined that there is no contamination, the product may be removed from quarantine status and sold. The CCC will be notified of product re-tests and the operational actions taken thereafter.

Products that are confirmed to be contaminated, or if the testing results are inconsistent with the labels on the product, will be quarantined and not sold to consumers.

REVISION HISTORY

Version	Date	Comment
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PERSONNEL POLICIES

OBJECTIVE

Webster Cannabis Company is committed to remaining compliant with the regulatory guidelines detailed in 935 CMR 500.105(8) et. seq. ("the Regulations") and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission ("CCC") or any other regulatory agency.

PERSONNEL RECORDS

Webster Cannabis Company will Maintain the following Personnel Records:

1. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;

2. A personnel record for each Webster Cannabis Company agent. Such records will be maintained for at least 12 months after termination of the individual's affiliation with Webster Cannabis Company **and** will include, at a minimum, the following:

1. All materials submitted to the Commission during Agent Registration;

2. Documentation of verification of references;

3. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;

4. Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;

5. Documentation of periodic performance evaluations;

6. A record of any disciplinary action taken; and

7. Notice of completed responsible vendor and eight-hour related duty training & in-house training for Marijuana Establishment Agents.

2. A staffing plan that will demonstrate accessible business hours and safe manufacturing & processing conditions;

3. Personnel policies and procedures, including, at a minimum, the following:

a. Code of ethics

b. Whistle-blower policy and

c. A policy which notifies persons with disabilities of their rights under https://www.mass.gov/service-details/about-employment-rights or a comparable link, and includes provisions prohibiting discrimination and providing reasonable accommodations

1. 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).

Business records, which will include manual or computerized records of:

1. Assets and liabilities

2. Monetary transactions

3. Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;

4. Sales records, including the quantity, form, and cost of marijuana products; and

5. Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over the marijuana establishment.

6. Waste disposal records will be maintained as required under 935 CMR 500.105(12); and (g) Following closure of a Marijuana Establishment, all records will be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission.

These Personnel Records will be held electronically and in hard copy. The electronic records will be stored in a secure server with encryption software that protects against unauthorized access to the files. Access to the electronic records will only be allowed to Webster Cannabis Company Management agents who require access. as part of their job duties. Hard Copy (written records) will be stored in a secure, locked cabinet in a locked room accessible to only Webster Cannabis Company **Management** agents who require access. These records will be made available for inspection by the Commission upon request.

WEBSTER CANNABIS COMPANY AGENTS

All Webster Cannabis Company board members, directors, employees, executives, managers and volunteers will register with the Commission as a Webster Cannabis Company Marijuana Establishment Agent ("Webster Cannabis Company Agent"). For clarity an employee means, any consultant or contractor who provides on-site services to a Marijuana Establishment related to the cultivation, harvesting, preparation, packaging, storage, testing, or dispensing of marijuana.

All Webster Cannabis Company **Agents** will;

1. Be 21 years of age or older;

2. Not been convicted of an offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority; and

3. Be determined suitable for registration consistent with the provisions of 935 CMR 500.800 and 935 CMR 500.801 or 935 CMR 500.802.

Webster Cannabis Company will submit to the Commission an application for every Webster Cannabis Company **Agent**, this application will include;

1. The full name, date of birth, and address of the individual;

2. All aliases used previously or currently in use by the individual, including maiden name, if any;

3. A copy of the applicant's driver's license, government-issued identification card, liquor purchase identification card issued pursuant to M.G.L. c. 138, § 34B, or other verifiable identity document acceptable to the Commission;

4. An attestation that the individual will not engage in the diversion of marijuana or marijuana products;

5. Written acknowledgment by the applicant of any limitations on his or her authorization to cultivate, harvest, prepare, package, possess, transport, and dispense marijuana in the Commonwealth;

6. Background information, including, as applicable:

1. A description and the relevant dates of any criminal action under the laws of the Commonwealth, or an Other Jurisdiction, whether for a felony or misdemeanor and which resulted in conviction, or guilty plea, or plea of nolo contendere, or admission of sufficient facts;

2. A description and the relevant dates of any civil or administrative action under the laws of the Commonwealth, or an Other Jurisdiction, relating to any professional or occupational or fraudulent practices;

3. 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;

4. A description and relevant dates of any past discipline by, or a pending disciplinary action or unresolved complaint by, the Commonwealth, or an Other Jurisdiction, with regard to any professional license or registration held by the applicant; and

2. A nonrefundable application fee paid by the Marijuana Establishment with which the marijuana establishment agent will be associated; and

3. Any other information required by the Commission.

Webster Cannabis Company CEO will register with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: I CORI Registration and will submit to the Commission a Criminal Offender Record Information (CORI) report and any other background check information required by the Commission for each individual for whom Webster Cannabis Company seeks a marijuana establishment agent registration which was obtained within 30 days prior to submission.

(a) The CORI report obtained by the Marijuana Establishment will provide information authorized under Required Access Level 2 pursuant to 803 CMR 2.05(3)(b)2. (b) The Marijuana Establishment's collection, storage, dissemination and usage of any CORI report or background check information obtained for Marijuana Establishment Agent registrations will comply with 803 CMR 2.00: Criminal Offender Record Information (CORI) and all other applicable state and local laws and regulations.

Webster Cannabis Company **will** notify the Commission no more than one business day after a Webster Cannabis Company agent ceases to be associated with the establishment. The registration will be immediately void when the agent is no longer associated with the establishment.

The Agent registration card is valid for one year from the date of issue, Webster Cannabis Company **will** renew each Webster Cannabis Company **Agent** Registration Card on an annual basis upon a determination by the Commission that the applicant for renewal continues to be suitable for registration.

After obtaining a registration card for a Webster Cannabis Company **Agent** registration card, Webster Cannabis Company **will** notify the Commission, in a form and manner determined by the Commission, as soon as possible, but in any event, within five business days of any changes to the information that the establishment was previously required to submit to the Commission or after discovery that a registration card has been lost or stolen.

All Agents will always carry a Registration Card associated with the appropriate Marijuana Establishment while in possession of Marijuana or Marijuana Products, including at all times while at the establishment or while transporting Marijuana or Marijuana Products.

A Marijuana Establishment Agent affiliated with multiple Marijuana Establishments will be registered as a Marijuana Establishment Agent by each Marijuana Establishment and will be issued an Agent Registration Card for each establishment.

An Agent working in a CMO may only perform tasks and duties permitted by the license under which they are registered and may only perform both medical- and adult-use tasks and duties if registered under both 935 CMR 500.000 and 501.000: Medical Use of Marijuana.

BACKGROUND CHECKS

Webster Cannabis Company will comply with all Background Check requirements in the Regulations and any other sub-regulatory guidance issued by the Commission.

Application Process

During the application process Webster Cannabis Company will complete the Background Check Packet. which includes;

1. The list of individuals and entities in 935 CMR 500.101(1)(a)1. (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);

2. Information for each individual which will include:

1. The individual's full legal name and any aliases;

2. The individual's address;

3. The individual's date of birth;

4. A photocopy of the individual's driver's license or other government-issued identification card;

5. A CORI Acknowledgment Form, pursuant to 803 CMR 2.09: Requirements for Requestors to Request CORI, provided by the Commission, signed by the individual and notarized;

6. Authorization to obtain a full set of fingerprints, in accordance with M.G.L. c. 94G, § 21, and Public Law 92-544, submitted in a form and manner as determined by the Commission; and

7. Any other authorization or disclosure deemed necessary by the Commission, for the purposes of conducting a background check.

2. Relevant Background Check Information. Applicants for licensure will also be required to provide information detailing involvement in any criminal or civil or administrative matters:

1. A description and the relevant dates of any criminal action under the laws of the Commonwealth, or an Other Jurisdiction, whether for a felony or misdemeanor including, but not limited to, action against any health care facility or facility for providing Marijuana for medical- or adult-use purposes, in which those individuals either owned shares of stock or served as board member, Executive, officer, director

or member, and which resulted in conviction, or guilty plea, or plea of nolo contendere, or admission of sufficient facts;

2. A description and the relevant dates of any civil action under the laws of the Commonwealth, or an Other Jurisdiction including, but not limited to, a complaint relating to any professional or occupational or fraudulent practices; c. A description and relevant dates of any past or pending legal or disciplinary actions in the Commonwealth or any other state against an entity whom the applicant served as a Person or Entity Having Direct or Indirect Control, related to the cultivation, Processing, distribution, or sale of Marijuana for medical- or adult-use purposes;

3. A description and relevant dates of any past or pending legal or disciplinary actions in the Commonwealth or any other state against an entity whom the applicant served as a Person or Entity Having Direct or Indirect Control, related to the cultivation, Processing, distribution, or sale of Marijuana for medical- or adult-use purposes;

4. A description and the relevant dates of any administrative action with regard to any professional license, registration, or certification, including any complaint, order, stipulated agreement or settlement, or disciplinary action, by the Commonwealth, or like action in another Jurisdiction including, but not limited to, any complaint or issuance of an order relating to the denial, suspension, or revocation of a license, registration, or certification;

5. A description and relevant dates of any administrative action, including any complaint, order or disciplinary action, by the Commonwealth, or a like action by an Other Jurisdiction with regard to any professional license, registration, or certification, held by any Person or Entity Having Direct or Indirect Control, if any;

6. A description and relevant dates of actions against a license to prescribe or distribute controlled substances or legend drugs held by any Person or Entity Having Direct or Indirect Control that is part of the applicant's application, if any; and

7. Any other information required by the Commission.

Webster Cannabis Company **will** not present any individual in our application whose background check will result in a Mandatory Disqualification or Presumptive Negative Suitability Determination as outlined in Table A of 935 CMR 500.801.

Background Checks not included in the Application Process**-**

For all Marijuana Establishment Agent Registrations not included in the application process Webster Cannabis Company **will** submit Marijuana Establishment Agent applications for all required individuals. Webster Cannabis Company will perform is own due diligence in the hiring of employees and contractors and will not knowingly submit an employee or contractors' application if the background check would result in a Mandatory Disqualification or Presumptive Negative Suitability Determination as outlined in Table B: Retail and Transporter Marijuana Establishment Agents.

EQUAL EMPLOYMENT POLICY

It is the policy of Webster Cannabis Company **to** provide equal employment opportunities to all employees and employment applicants without regard to unlawful considerations of race, religion, creed, color, national origin, sex, pregnancy, sexual orientation, gender identity, age, ancestry, physical or mental disability, genetic information, marital status or any other classification protected by applicable local, state or federal laws. This policy prohibits unlawful discrimination based on the perception that anyone has any of those characteristics or is associated with a person who has or is perceived as having any of those characteristics. This policy applies to all aspects of employment, including, but not limited to, hiring, job assignment, working conditions, compensation, promotion, benefits, scheduling, training, discipline and termination.

Webster Cannabis Company expects all employees to support our equal employment opportunity policy, and to take all steps necessary to maintain a workplace free from unlawful discrimination and harassment and to accommodate others in line with this policy to the fullest extent required by law. For example, Webster Cannabis Company will make reasonable accommodations for employees' observance of religious holidays and practices unless the accommodation would cause an undue hardship on Webster Cannabis Company operations. If an employee desires a religious accommodation, they are required to make the request in writing to their manager as far in advance as possible. Employees requesting accommodations are expected to attempt to find co-workers who can assist in the accommodation (e.g., trade shifts) and cooperate with Webster Cannabis Company **in** seeking and evaluating alternatives.

Moreover, in compliance with the Americans with Disabilities Act (ADA), Webster Cannabis Company provides reasonable accommodations to qualified individuals with disabilities to the fullest extent required by law. Webster Cannabis Company **may** require medical certification of both the disability and the need for accommodation. Keep in mind that Webster Cannabis Company can only seek to accommodate the known physical or mental limitations of an otherwise qualified individual. Therefore, it is the employees' responsibility to come forward if they are in need of an accommodation. Webster Cannabis Company **will** engage in an interactive process with the employee to identify possible accommodations, if any will help the applicant or employee perform the job.

ANTI-HARASSMENT AND SEXUAL HARASSMENT POLICY

Webster Cannabis Company **seeks** to promote a workplace that is free from discrimination and harassment, whether based on race, color, gender, age, religion, creed, national origin, ancestry, sexual orientation, marital status or disability. Inappropriate interference with the ability of Webster Cannabis Company's employees to perform their expected job duties is not tolerated.

It is illegal and against Webster Cannabis Company policy for any employee, male or female, to harass another employee. Examples of such harassment include making sexual advances or favors or other verbal or physical conduct of a sexual nature a condition of any employee's employment; using an employee's submission to or rejection of such conduct as the basis for, or as a factor in, any employment decision affecting the individual; or otherwise creating an intimidating, hostile, or offensive working environment by such conduct.

The creation of an intimidating, hostile, or offensive working environment may include but is not limited to such actions as persistent comments on an employee's sexual preferences, the display of obscene or sexually oriented photographs or drawings, or the telling of sexual jokes. Conduct or actions that arise out of a personal or social relationship and that are not intended to have a discriminatory employment effect may not be viewed as harassment. Webster Cannabis Company will determine whether such conduct constitutes sexual harassment, based on a review of the facts and circumstances of each situation.

Webster Cannabis Company **will** not condone any sexual harassment of its employees. All employees, including supervisors and managers, will be subject to severe discipline, up to and including discharge, for any act of sexual harassment they commit.

Webster Cannabis Company **will** not condone sexual harassment of its employees by non-employees, and instances of such harassment should be reported as indicated below for harassment by employees.

If you feel victimized by sexual harassment you should report the harassment to your manager immediately. If your immediate manager is the source of the alleged harassment, you should report the problem to the Human Resources Department.

Managers who receive a sexual harassment complaint should carefully investigate the matter, questioning all employees who may have knowledge of either the incident in question or similar

problems. The complaint, the investigative steps and findings, and disciplinary actions (if any) should be documented as thoroughly as possible.

Any employee who makes a complaint, or who cooperates in any way in the investigation of same, will not be subjected to any retaliation or discipline of any kind.

In addition to the above, if you believe you have been subjected to sexual harassment, you may file a formal complaint with either or both of the government agencies set forth below. Using our complaint process does not prohibit you from filing a complaint with these agencies. Each of the agencies has a short time period for filing a claim (EEOC - 300 days; MCAD - 300 days).

The United States Equal Employment Opportunity Commission ("EEOC") One Congress Street, 10th Floor Boston, MA 02114, (617) 565-3200.
The Massachusetts Commission Against Discrimination ("MCAD") One Ashburton Place, Rm. 601, Boston, MA 02108, (617) 994-6000.

AMERICANS WITH DISABILITY ACT

Webster Cannabis Company **strongly** supports the policies of the Americans with Disabilities Act and is completely committed to treating all applicants and employees with disabilities in accordance with the requirements of that act. Webster Cannabis Company **judge's** individuals by their abilities, not their disabilities, and seeks to give full and equal employment opportunities to all persons capable of performing successfully in the company's positions. Webster Cannabis Company **will** provide reasonable accommodations to any persons with disabilities who require them, who advise Webster Cannabis Company **of** their particular needs. Information concerning individuals' disabilities and their need for accommodation will of course be handled with the utmost discretion.

DRUG FREE WORKPLACE

Webster Cannabis Company is committed to providing its employees with a safe and productive work environment. In keeping with this commitment, it maintains a strict policy against the use of alcohol and the unlawful use of drugs in the workplace. Consequently, no employee may consume or possess alcohol, or use, possess, sell, purchase or transfer illegal drugs at any time while on Webster Cannabis Company **premises** or while using Webster Cannabis Company's vehicles or equipment, or at any location during work time.

No employee may report to work with illegal drugs (or their metabolites) or alcohol in his or her bodily system. The only exception to this rule is that employees may engage in moderate consumption of alcohol that may be served and/or consumed as part of an authorized Company social or business event. "Illegal drug" means any drug that is not legally obtainable or that is legally obtainable but has not been legally obtained. It includes prescription drugs not being used for prescribed purposes or by the person to whom it is prescribed or in prescribed amounts. It also includes any substance a person holds out to another as an illegal drug.

Any violation of this policy will result in disciplinary action, up to and including termination.

Any employee who feels he or she has developed an addiction to, dependence upon, or problem with alcohol or drugs, legal or illegal, is strongly encouraged to seek assistance before a violation of this policy occurs. Any employee who requests time off to participate in a rehabilitation program will be reasonably accommodated. However, employees may not avoid disciplinary action, up to and including termination, by entering a rehabilitation program after a violation of this policy is suspected or discovered.

Smoke Free Workplace

Smoking is prohibited throughout the workplace. This policy applies equally to all employees, clients, partners, and visitors.

Employee diversion of Marijuana

Webster Cannabis Company has policy for the immediate dismissal of any agent who has diverted marijuana, engaged in unsafe practices, or been convicted or entered a guilty plea for a felony charge of distribution of a drug to a minor.

If a Webster Cannabis Company **Agent** is found to have diverted marijuana, that agent will immediately be dismissed and have their Marijuana Establishment Registration Card confiscated. The CEO will immediately be notified. The CEO will make a detailed report of the event and report it to local law enforcement and the Commission within 24 hours.

Confidentiality

(1) All records made or sent to the Commission will be public records and will be available for disclosure on request pursuant to this section and 950 CMR 32.00: Public Records Access, except the following, which will be exempt from disclosure to the extent permitted by law: (a) All records exempt from disclosure pursuant to M.G.L. c. 4, § 7, cl. 26; (b) All records to the extent that they contain "personal data" pursuant to M.G.L. c. 66, § 10; (c) All records to the extent that they contain "personal information" pursuant to M.G.L. c. 93H, § 1; (d) All records which contain CORI as defined by 803 CMR 2.02: Definitions; (e) All records which contain CHRI as defined by 803 CMR 7.02: Definitions; and (f) All Confidential Records as defined in 935 CMR 500.002.

(2) All records protected from disclosure under 935 CMR 500.820(1) or pursuant to the laws of any Other Jurisdiction may be disclosed by the Commission:

(a) If disclosure is required pursuant to a state or federal law;

(b) To the individual or the individual's authorized representative, if the individual executes a written release in a form and manner determined by the Commission;

(c) To the Commission staff for the purpose of carrying out their official duties;

(d) To the Commission Delegee(s) as authorized by the Commission;

(e) To other government officials and agencies acting within their lawful jurisdiction which includes, but is not limited to, law enforcement personnel;

(f) To a healthcare professional who has a Bona Fide Healthcare Professional-Patient Relationship with the Qualifying Patient to facilitate dispensing of Medical-use Marijuana;

(g) To an MTC or any state agency to facilitate the dispensing of Medical-use Marijuana;

(h) To the Commission staff if required in the course of an administrative or a judicial proceeding; or

(i) If an individual or entity obtains an order from a court of competent jurisdiction.

(3) Nothing in 935 CMR 500.820 will prevent the Commission from acting in accordance with its authority.

a plan describing how confidential information will be maintained. Confidential information will be locked inside of the file cabinets. There will be a locking cabinet strictly for background check information, and two separate locking cabinets for personnel records and other confidential information.

The General Manager and Security will both have keys to these locking, confidentiality cabinets.

Marijuana Establishment Agent Training

(a)Webster Cannabis Company will ensure that all Marijuana Establishment Agents complete minimum training requirements prior to performing job functions.

1. At a minimum, Webster Cannabis Company Agents will receive a total of eight hours of training annually. The eight-hour total training requirement will be tailored to the roles and responsibilities of the job function of each Marijuana Establishment Agent.
2. A minimum of four hours of training will be from Responsible Vendor Training Program courses. Any additional RVT hours over the four-hour RVT requirement may count toward the eight-hour total training requirement.
3. non-RVT training may be conducted in-house by Webster Cannabis Company or by a third-party vendor engaged by the Marijuana Establishment. Basic on-the-job training Marijuana Establishments provided in the ordinary course of business may be counted toward the eight-hour total training requirement.
4. Agents responsible for tracking and entering product into the Seed-to-sale SOR will receive training in a form and manner determined by the Commission. At a minimum, staff will receive eight hours of on-going training annually.
5. Webster Cannabis Company will maintain records of compliance with all training requirements noted above. Such records will be maintained for four years and Marijuana Establishments will make such records available for inspection on request.
6. An individual who is both a Marijuana Establishment Agent and MTC Agent at a CMO location will receive the training required for each license under which the agent is registered including, without limitation, with respect to patient privacy and confidentiality requirements, which may result in instances that would require such an agent to participate in more than eight hours of training.

REVISION HISTORY

Version	Date	Comment
1.0	November 2, 2022	Created by Casey Nothe

DIVERSITY PLAN

Statement of Purpose

Webster Cannabis Company LLC ("Webster Cannabis Company" or "the Company") is committed to creating a diverse and inclusive workplace that provides opportunity and encourages participation in the legal cannabis industry by individuals of all backgrounds and particularly women, minorities, veterans, persons with disabilities, and individuals who identify as LGBTQ+. It is our belief that our company and marijuana establishment should reflect and celebrate the wide diversity of our host community – the Town of Webster – and the Commonwealth of Massachusetts in general.

Goals

In order for Webster Cannabis Company to promote equity for the above-listed groups in its operations and the cannabis industry in Massachusetts, the Company has established the following goals:

1. Hire and retain a diverse and inclusive group of employees, with the following specific staff percentage goals:
    a. At least 50% women
    b. At least 30% minorities
    c. At least 10% veterans
    d. At least 10% persons with disabilities
    e. At least 10% individuals who identify as LGBTQ+

2. Contracting with diverse businesses for the purchase of wholesale marijuana product and the provision of other services required for the operation and maintenance of the Company's marijuana establishment, with the following specific goals:
    a. At least 10% of all contracts with businesses that are majority-owned or managed by women;
    b. At least 10% of all contracts with businesses that are majority-owned or managed by minorities;
    c. At least 5% of all contracts with businesses that are majority-owned or managed by veterans;
    d. At least 5% of all contracts with businesses that are majority-owned or managed by persons with disabilities
    e. At least 5% of all contracts with businesses that are majority-owned or managed by individuals who identify as LGBTQ+.

Programs

Webster Cannabis Company has developed specific programs to effectuate its stated goals to promote diversity and equity in its operations, which will include the following:

1. Hold a career fair at least once annually in the Town of Webster and encourage individuals with diverse backgrounds to apply for open positions. The career fair will be advertised in the Worcester Telegram & Gazette, on the Company's website and through the Company's Instagram social media account and the Webster Times.

2. Advertise employment opportunities as they become available on DiversityJobs.com and in the Worcester Telegram & Gazette and the Webster Times

3. Utilize the Massachusetts Supplier Diversity Office and other available resources, including the CCC's public documents, to find and prioritize the engagement of qualified wholesale suppliers, vendors and other contractors that are majority owned and controlled by diverse individuals.

Measurements

The Company's management team will administer this Diversity Plan and will be responsible for developing measurable outcomes to ensure Webster Cannabis Company continues to meet its commitments. Such measurable outcomes, in accordance with Webster Cannabis Company's goals and programs described above, include:

1. Conducting employment composition reviews to determine what percentage of employees identify as being from the above-listed groups, with the goal of having an employment composition of least 50% women, 30% minorities, 10% veterans, 10% disabled individuals and 10% individuals that identify as LGBTQ+.

2. Documenting the number of employment opportunities posted on DiversityJobs.com and in the Worcester Telegram & Gazette, and the number of diverse individuals interviewed and hired as a result of these efforts.

3. Documenting the number of diverse suppliers, vendors and contractors contacted for services or products and the number of diverse companies that are engaged to determine if the percentage goals for contracts with various types of diverse businesses are achieved.

Beginning upon receipt of the first Provisional Marijuana Establishment License, Webster Cannabis Company will utilize the proposed measurements to assess its Diversity Plan and will account for demonstrating proof of success or progress of the Plan upon the yearly renewal of the license. The management team will review and evaluate Webster Cannabis Company's measurable outcomes no less than annually to ensure that Webster Cannabis Company is meeting its commitments. Webster Cannabis Company is mindful that demonstration of the Plan's progress and success will be submitted to the Commission upon renewal.

Acknowledgements

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