



Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR281834
Original Issued Date: 04/06/2020
Issued Date: 03/11/2021
Expiration Date: 04/06/2022

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Evergreen Strategies, LLC

Phone Number: 617-997-6888
Email Address: aparrinello@clearskycannabis.com

Business Address 1: 118 Great Road
Business City: Stow
Business State: MA
Business Address 2: Suite 220
Business Zip Code: 01775
Mailing Address 1: PO Box 753
Mailing City: Stow
Mailing State: MA
Mailing Zip Code: 01775

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
Role: Executive / Officer
Percentage Of Control: 100
Other Role:

First Name: Anthony	Last Name: Parrinello	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: Executive / Officer	Other Role: CFO	
First Name: Alan	Last Name: Barber	Suffix:
Gender: Male	User Defined Gender:	
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)		
Specify Race or Ethnicity:		

Person with Direct or Indirect Authority 3

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

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

Close Associates or Member 1

First Name: Catherine	Last Name: Parrinello	Suffix:
Describe the nature of the relationship this person has with the Marijuana Establishment: Catherine Parrinello is the wife of the Company owner Anthony Parrinello. Catherine is also a capital contributor to the Company's initial capital.		

CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: Catherine	Last Name: Parrinello	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

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

Business Interest in Other State 1

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner		
Owner First Name: Anthony	Owner Last Name: Parrinello	Owner Suffix:
Entity Legal Name: Temescal Wellness, Inc.		Entity DBA:
Entity Description: New Hampshire Licensed Therapeutic Cannabis Operator		
Entity Phone: 603-285-9383	Entity Email: info@temescalwellness.com	Entity Website: www.temescalwellness.com
Entity Address 1: 645 Harvey Rd.		Entity Address 2:

Entity City: Manchester	Entity State: NH	Entity Zip Code: 03103	Entity Country: USA
Entity Mailing Address 1: 645 Harvey Rd.		Entity Mailing Address 2:	
Entity Mailing City: Manchester	Entity Mailing State: NH	Entity Mailing Zip Code: 03103	Entity Mailing Country: USA

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Anthony	Last Name: Parrinello	Suffix:
Marijuana Establishment Name: Temescal Wellness of Massachusetts, Inc	Business Type: Other	
Marijuana Establishment City: Worcester, Pittsfield, Framingham and Hudson	Marijuana Establishment State: MA	

Individual 2

First Name: Anthony	Last Name: Parrinello	Suffix:
Marijuana Establishment Name: 202 Trading Company, LLC	Business Type: Marijuana Retailer	
Marijuana Establishment City: Winchendon	Marijuana Establishment State: MA	

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 143 SW Cutoff	
Establishment Address 2:	
Establishment City: Worcester	Establishment Zip Code: 01604
Approximate square footage of the establishment: 3700	How many abutters does this property have?: 7
Have all property abutters been notified of the intent to open a Marijuana Establishment at this address?: Yes	

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Community Outreach Meeting Documentation	COM Attestation and Supporting Documents.pdf	pdf	5c50d6d0eadf341230f6482e	01/29/2019
Certification of Host Community Agreement	HCA Attestation20190129_17195932.pdf	pdf	5c50d6ec635d511b3474cb2e	01/29/2019
Plan to Remain Compliant with Local Zoning	ES Plan to Remain Compliant with Local Zoning.pdf	pdf	5c50d8a0d7a931124ee00125	01/29/2019

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.: \$1

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Plan for Positive Impact Final1.pdf	pdf	5d3f9dd9b0555e33d0bcde84	07/29/2019

ADDITIONAL INFORMATION NOTIFICATION

Notification: I understand

INDIVIDUAL BACKGROUND INFORMATION

Date generated: 03/25/2021

Individual Background Information 1

Role: Other Role:
First Name: Anthony Last Name: Parrinello Suffix:
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 2

Role: Other Role:
First Name: Catherine Last Name: Parrinello Suffix:
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 3

Role: Other Role:
First Name: Jean Last Name: Welsh Suffix:
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 4

Role: Other Role:
First Name: Alan Last Name: Barber 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
Articles of Organization	ES Cert of Organization[1].pdf	pdf	5b7f60cb4e62492d8f344ae4	08/23/2018
Bylaws	Operating Agreement.pdf	pdf	5c3a54dceadf341230f62ff7	01/12/2019
Department of Revenue - Certificate of Good standing	MA DOR COGS 8.2.19.pdf	pdf	5d783ffcd8b08e1dbf145260	09/10/2019
Secretary of Commonwealth - Certificate of Good Standing	SOS COGS 8.2.19.pdf	pdf	5d78400f8470d4229ba45a27	09/10/2019

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	MA Secretary of State - Certificate of Good Standing - 1-12-21.pdf	pdf	601d8b294dba6f360b67e5ae	02/05/2021
Department of Revenue - Certificate of Good standing	MA DOR Certificate of Good Standing - 1-12-21.pdf	pdf	601d8b3265c0d035fcc4c3e2	02/05/2021
Department of Unemployment Assistance - Certificate of Good	Evergreen Strategies - MA DUA - Certificate of Good Standing -	pdf	601d8b3d604cbb361670e4b2	02/05/2021

Massachusetts Business Identification Number: 001317729

Doing-Business-As Name: Clear Sky Cannabis

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	Liability Insurance Plan.pdf	pdf	5c5078cfeadf341230f64708	01/29/2019
Business Plan	Evergreen Strategies Business Plan_Worcester.pdf	pdf	5c507ba93183181258e17d8f	01/29/2019
Proposed Timeline	Worcester Proposed Timeline_v3.0.pdf	pdf	601d8db1238c3036b0f84cee	02/05/2021

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Security plan	CSC Security Plan_Worcester.pdf	pdf	601d8f32d44ed235c8c46165	02/05/2021
Separating recreational from medical operations, if applicable	CSC Plan for Separating Recreational from Medical Operations.pdf	pdf	601d90ba6902113684c6dd8d	02/05/2021
Restricting Access to age 21 and older	CSC Limiting Access to Age 21 and Older.docx.pdf	pdf	601d916784d16335f0223736	02/05/2021
Prevention of diversion	CSC Prevention of Diversion SOP_Retail.docx.pdf	pdf	601d922710e86b36bb895720	02/05/2021
Storage of marijuana	CSC Storage of Marijuana SOP.docx.pdf	pdf	601d928572b5633675942d0d	02/05/2021
Diversity plan	CSC Diversity Plan.pdf	pdf	601d959f238c3036b0f84d17	02/05/2021
Qualifications and training	CSC Agent Qualifications and Training SOP.docx.pdf	pdf	601d95a072b5633675942d20	02/05/2021
Maintaining of financial records	CSC Maintenance of Financial Records SOP.docx.pdf	pdf	601d95a1d44ed235c8c46190	02/05/2021
Record Keeping procedures	CSC Record Keeping SOP.docx.pdf	pdf	601d95a34cfbf7366ef3d4aa	02/05/2021
Personnel policies including background checks	CSC Personnel Policies_including Background Checks.docx.pdf	pdf	601d95a5fade7a35e9f2e169	02/05/2021
Dispensing procedures	CSC Dispensing SOP.docx.pdf	pdf	601d95d072b5633675942d24	02/05/2021
Quality control and testing	CSC Quality Control and Product Testing SOP_Retail.docx.pdf	pdf	601d95d1d44ed235c8c46196	02/05/2021
Inventory procedures	CSC Inventory SOP.docx.pdf	pdf	601d95d24cfbf7366ef3d4ae	02/05/2021
Transportation of marijuana	CSC Transportation of Marijuana SOP.docx.pdf	pdf	601d95d46d809f35defbaa2b	02/05/2021
Energy Compliance Plan	CSC Energy Plan.docx.pdf	pdf	601d9680d44ed235c8c461a4	02/05/2021
Plan for obtaining marijuana or marijuana products	CSC Plan to obtain marijuana.pdf	pdf	601d988d1c95e43696ccd2f8	02/05/2021

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

ATTESTATIONS

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

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

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

Notification: I Understand

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

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 Agree

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

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

COMPLIANCE WITH POSITIVE IMPACT PLAN

Progress or Success Goal 1

Description of Progress or Success: Goal 1- Create jobs for North Adams and Worcester residents living in an area of disproportionate impact with a compensation structure, employee benefit package and growth opportunities that provide a living wage and encourage consumer spending. Our goal is to have 60% of our workforce meet the criteria outlined in the above listed Program Population.

Progress- Clear Sky Cannabis is currently hiring staff for our North Adams Retail Establishment. Our first hire, General Manager, has been filled by a resident of North Adams. We expect that once this hiring cycle is complete will reach our goal of having at least 60%^A of our workforce be from North Adams.

Progress or Success Goal 2

Description of Progress or Success: Goal 2- Partner with an established not-for-profit community organization that provides direct social services to populations in North Adams or Worcester. Our goal is to provide a minimum donation of \$12,000 and 100 hours of service annually.

Progress- As we are not yet operational and generating revenue our donation to our previously identified not-for-profit community organization, South Worcester Neighborhood Improvement Corp. (SWNIC) <http://www.swnic.net/> thus far has been \$500. We expect that we will reach our goal of a \$12,000 donation to SWNIC or other not-for-profit community organizations over the next year. Additionally, our community service volunteer hours will begin within 90 days of commencing operations.

Progress or Success Goal 3

Description of Progress or Success: Goal 3- Offer free mentoring and cannabis business advisory services to at least one Commission Designated Economic Empowerment Priority applicant.

Success- Clear Sky Cannabis has provided over 100 hours of advisory services to the KG Collective in the furtherance of their licensing goal. To date we have assisted KG Collective in receiving a Host Community Agreement in the City of Brockton, a Special Permit in the City of Cambridge

and continue to work with them as they pursue municipal approvals in Brockton, Cambridge and Boston.

COMPLIANCE WITH DIVERSITY PLAN

Diversity Progress or Success 1

Description of Progress or Success: Goal 1- For all of our Retail Establishment our goal is that 55% of our employees will be female. For our Worcester Retail Establishment, 60% of our employees will be minorities, veterans, people with disabilities and/or people who are LGBTQ+. For our North Adams Retail Establishment, 40% of our employees will be minorities, veterans, people with disabilities and/or people who are LGBTQ+.

Progress- Clear Sky Cannabis is not yet operation but has begun hiring staff for our North Adams Retail Establishment. Our first hire, General Manager, has been filled by individual who is LGBTQ+. We expect that once this hiring cycle is complete will reach our goals.

HOURS OF OPERATION

Monday From: 8:00 AM	Monday To: 11:00 PM
Tuesday From: 8:00 AM	Tuesday To: 11:00 PM
Wednesday From: 8:00 AM	Wednesday To: 11:00 PM
Thursday From: 8:00 AM	Thursday To: 11:00 PM
Friday From: 8:00 AM	Friday To: 11:00 PM
Saturday From: 8:00 AM	Saturday To: 11:00 PM
Sunday From: 10:00 AM	Sunday To: 11:00 PM

Community Outreach Meeting Attestation Form

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

I, Anthony Parrinello, (insert name) attest as an authorized representative of Evergreen Strategies LLC (insert name of applicant) that the applicant has complied with the requirements of 935 CMR 500 and the guidance for licensed applicants on community outreach, as detailed below.

1. The Community Outreach Meeting was held on August 14th 2018 (insert date).
2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on August 4th 2018 (insert date), which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A (please clearly label the newspaper notice in the upper right hand corner as Attachment A and upload it as part of this document).
3. A copy of the meeting notice was also filed on August 6th 2018 (insert date) with the city or town clerk, the planning board, the contracting authority for the municipality, and local licensing authority for the adult use of marijuana, if applicable. A copy of the municipal notice is attached as Attachment B (please clearly label the municipal notice in the upper right-hand corner as Attachment B and upload it as part of this document).
4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on August 7th 2018 (insert date), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee).

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

COMMUNITY OUTREACH MEETING

COMMUNITY OUTREACH MEETING Notice is hereby given by Evergreen Strategies, LLC. that a Community Outreach Meeting is scheduled for August 14, 2018 at 6:00pm at the South Worcester Neighborhood Improvement Corp. 47 Camp St. Worcester MA 01603. The proposed Retail Marijuana Establishment is anticipated to be located at 143 SW Cutoff, Worcester MA 01604 There will be an opportunity for the public to ask questions. Evergreen Strategies LLC. Evergreen Strategies LLC.

Appeared in: ***Worcester Telegram & Gazette*** on Saturday, 08/04/2018

[Back](#)

Thursday, August 23, 2018 at 10:08:46 PM Eastern Daylight Time

Subject: Notice- Adult Use Marijuana Retail Community Outreach Meeting- Action Required

Date: Monday, August 6, 2018 at 4:29:26 PM Eastern Daylight Time

From: Anthony Parrinello

To: council@worcesterma.gov, council@worcesterma.gov, planning@worcesterma.gov

August 6th 2018

To Whom It May Concern:

Notice is hereby given by Evergreen Strategies LLC. that a Community Outreach Meeting for a proposed Marijuana Retail Establishment is scheduled for August 14, 2018 at 6:00 PM at the South Worcester Neighborhood Improvement Corp. 47 Camp Street Worcester MA 01603. The proposed Retail Marijuana Establishment is anticipated to be located at 143 SW Cutoff, Worcester, MA 01604. There will be an opportunity for the public to ask questions.

Evergreen Strategies LLC.

Please confirm receipt by replying to this email communication.

Thank you.

Anthony Parrinello

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Anthony Parrinello
Evergreen Strategies
+1.617.997.6888

Notice of Community Outreach Meeting
For Adult-Use Marijuana Retail Establishment

Notice is hereby given that Evergreen Strategies LLC will conduct a Community Outreach Meeting as required under the adult use marijuana regulations, 935 CMR 500.101 on August 14th at 6pm at the South Worcester Neighborhood Improvement Corp. 47 Camp Street Worcester MA 01603. The proposed Retail Marijuana Establishment plans to be located at 143 SW Cutoff Worcester MA 01604.

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

Evergreen Strategies LLC

Host Community Agreement Certification Form

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

Applicant

I, *Julie Parnell*, (insert name) certify as an authorized representative of *Empire Strategies, LLC* (insert name of applicant) that the applicant has executed a host community agreement with *Worcester* (insert name of host community) pursuant to G.L.c. 94G § 3(d) on *January 28, 2019* (insert date).

Julie Parnell
Signature of Authorized Representative of Applicant

Host Community

I, *Edward M. Augustus Jr.*, (insert name) certify that I am the contracting authority or have been duly authorized by the contracting authority for *City of Worcester* (insert name of host community) to certify that the applicant and *City of Worcester* (insert name of host community) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on *January 28, 2019* (insert date).

Edward M. Augustus Jr.
Signature of Contracting Authority or
Authorized Representative of Host Community
Edward M. Augustus Jr., City Manager

Plan to Remain Compliant with Local Zoning

Purpose

The purpose of this plan is to outline how Evergreen Strategies, LLC. will remain in compliance and ensure that the Marijuana Establishment is and will remain compliant with local codes, ordinances and bylaws for the physical address of our Marijuana Establishment at 143 SW Cutoff, Worcester, MA 01604, which includes, but not be limited to, the identification of any local licensing requirements for the adult use of marijuana.

Background

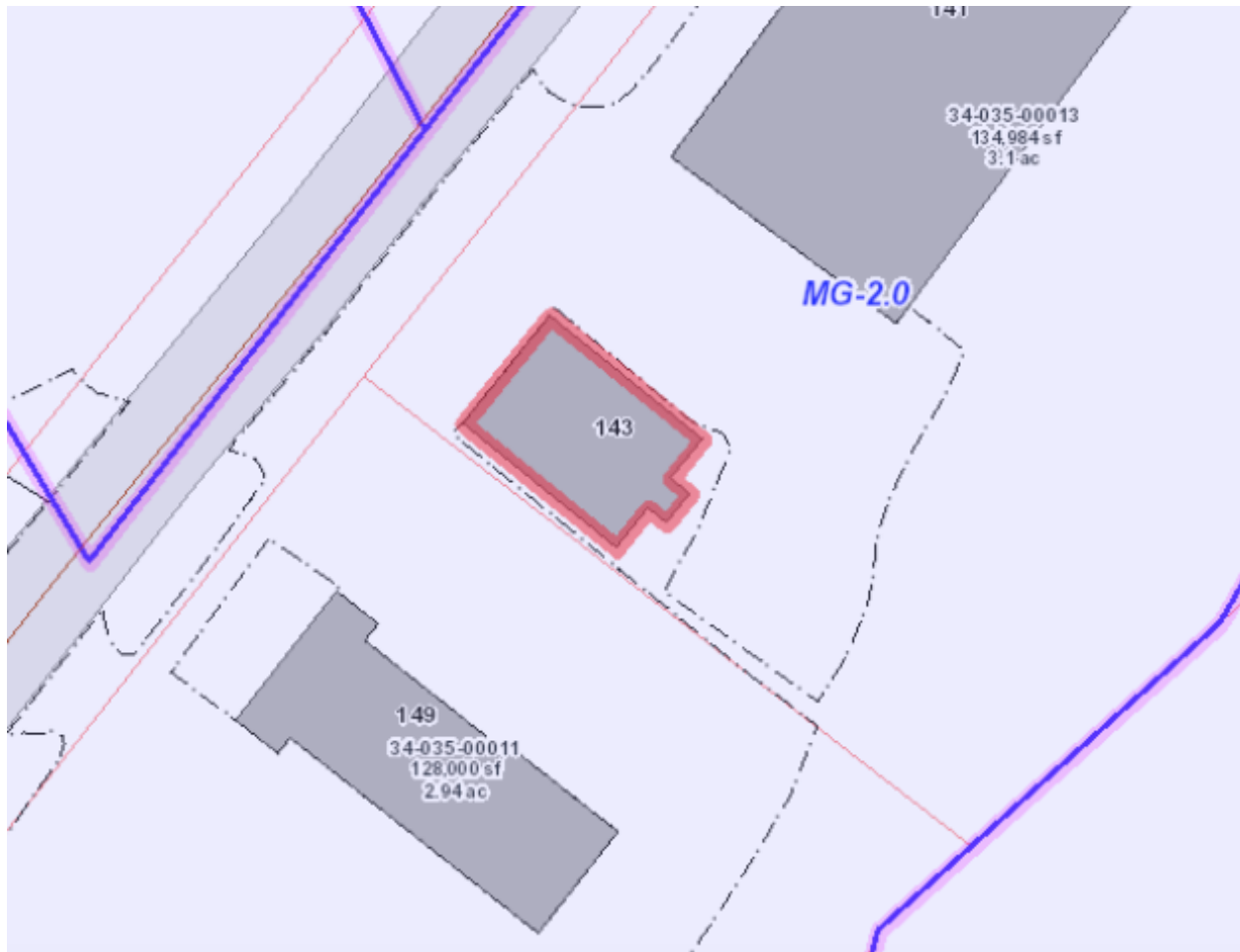
The Worcester City Council enacted a City Zoning Ordinance that established zoning restrictions for Adult-Use marijuana establishments.

SECTION 1. The City of Worcester Zoning Ordinance, adopted April 2, 1991, is hereby amended by inserting the following Section 15 at the end of Article IV as follows:

Article IV Section 15 – Adult Use Marijuana

The Ordinance defines Marijuana Storefront Retailer as a marijuana retailer that provides a retail location accessible to consumers 21 years of age or older or in possession of a registration card demonstrating that the individual is a registered qualifying patient with the Medical Use of Marijuana Program, if the retail store is co-located within a medical marijuana treatment center.

By these definitions, our proposed location at 143 SW Cutoff is compliant for the uses and Marijuana Establishment License types. The City of Worcester, through this ordinance, elected to allow Marijuana Storefront Retailers in specified zoning districts in the City of Worcester through a special permit granted by the Worcester Planning Board. Our location is located in the MG-2.0 Zoning District and properly zoned pursuant to the amended Worcester Zoning Ordinance.



SECTION 5. The City of Worcester Zoning Ordinance is hereby amended by inserting in Article IV, Section 2, Table 4.1 – Business Uses, the following new line 35. Marijuana Storefront Retailer/Marijuana Delivery Only Retailer:

35. Marijuana Storefront Retailer/Marijuana Delivery Only Retailer

SECTION 5. The City of Worcester Zoning Ordinance is hereby amended by inserting in Article IV, Section 2, Table 4.1 – Business Uses, the following new line 35. Marijuana Storefront Retailer/Marijuana Delivery Only Retailer:

35. Marijuana Storefront Retailer/Marijuana Delivery Only Retailer

RS	RS	RL	RG	BO	BO	BL	BG	BG	BG	BG	ML	ML	ML	MG	MG	MG	IP	IN	IN	A
10	7	7	5	1	2	1	2	3	4	6	0.5	1.0	2.0	0.5	1.0	2.0	.33	S	H	1
N	N	N	N	N	N	SP	SP	SP	SP	SP	SP	SP	SP	SP	SP	SP	N	N	N	N

Plan:

Evergreen Strategies is currently fully compliant with all of the requirements outlined in the Ordinance and with the Special Permit Approval Criteria outlined in the amendment to the Worcester Zoning Ordinance.

It is the intention of Evergreen Strategies, LLC. to remain compliant with all relevant local codes, ordinances and applicable to a Marijuana Product Manufacturer and Marijuana Transporter.

In addition to Evergreen Strategies, LLC remaining compliant with the existing Worcester Zoning Ordinance, our executive management team and General Counsel will continually engage with the City of Worcester to remain up to date with local codes zoning ordinances and by-laws, to remain fully compliant.

From: Anthony Parrinello <aparrinello@clearskycannabis.com>

Date: Friday, February 5, 2021 at 8:44 AM

To: citymanager@worcesterma.gov <citymanager@worcesterma.gov>, augustuse@worcesterma.gov <augustuse@worcesterma.gov>

Cc: sandersj@worcesterma.gov <sandersj@worcesterma.gov>, genkosj@worcesterma.gov <genkosj@worcesterma.gov>

Subject: Evergreen Strategies d/b/a Clear Sky Cannabis CCC License Renewal 143 SWC (Action Required)

Manager Augustus- Good morning. As you are likely aware, The Cannabis Control Commission requires licensees to request from the host community, records of any cost to the city or town reasonably related to the operation of our establishment. Per the CCC guidance these costs can include actual and anticipated costs associated with the operation of the establishment.

At your earliest convenience, please provide this information. If the city has not incurred any costs related to the operation of our forthcoming establishment that's ok too- simply acknowledge and respond by replying to this email communication.

Thank you

Anthony

Anthony Parrinello

Chief Executive Officer

Clear Sky Cannabis

118 Great Road, Suite 220

Stow, MA 01775

c: 617-997-6888

www.clearskycannabis.com



Municipal Cost Documentation

Evergreen Strategies, Inc. d/b/a Clear Sky Cannabis has sent an email to the City of Worcester requesting records of any cost to the city reasonably related to the operation of our Establishment and are currently awaiting their response. If/when we receive a response from the City we will forward it to the Commission.

EVERGREEN STRATEGIES, LLC

PLAN FOR POSITIVELY IMPACTING AREAS OF DISPROPORTIONATE IMPACT

Evergreen Strategies is privileged to help individuals from “Areas of Disproportionate Impact” experience a positive impact from the operation of our Retail Marijuana Establishments. Worcester and North Adams are two of 29 communities designated as “areas of disproportionate impact” meaning these municipalities have been disproportionately affected by cannabis prohibition and enforcement. Our plan with the accompanying goals, programs and measurements is specifically designed to provide opportunities for residents in North Adams and those designated areas of the City of Worcester.

Evergreen Strategies acknowledges and is aware, and 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 and that any actions taken, or programs instituted, will not violate the Commission’s regulations with respect to limitations on ownership or control or other applicable state laws.

The organizations named in our Community Service Partner Program have been contacted and are willing to accept the donations that we intend to provide. (See supporting documentation included with this communication)

1. PROGRAM POPULATIONS

The programs in this plan will be aimed to positively impact the following populations:

- A. Past or present residents of “areas of disproportionate impact,” which have been defined by the Commission, specifically the City of North Adams and those areas of the City of Worcester identified as areas of disproportionate impact.
 - B. Commission-designated Economic Empowerment Priority applicants;
 - C. Commission-designated Social Equity Program participants;
 - D. Massachusetts residents who have past drug convictions; and
 - E. Massachusetts residents with parents or spouses who have drug convictions.
-

2. GOALS FOR POSITIVE IMPACT

- A. Create jobs for North Adams and Worcester residents living in an area of disproportionate impact with a compensation structure, employee benefit package and growth opportunities that provide a living wage and encourage consumer spending. Our goal is to have 60% of our workforce meet the criteria outlined in the above listed Program Population.
 - B. Partner with an established not-for-profit community organization that provides direct social services to populations in North Adams or Worcester. Our goal is to provide a minimum donation of \$12,000 and 100 hours of service annually
 - C. Offer free mentoring and cannabis business advisory services to at least one Commission Designated Economic Empowerment Priority applicant.
-

3. PROGRAMS

EMPLOYMENT PROGRAM

Expanding opportunities for gainful employment is a key driver in helping communities disproportionately affected by cannabis prohibition. Quality jobs that pay above minimum wage and offer benefits assist individuals and families in breaking cycles of poverty and incarceration. The

company's dispensary plans to positively impact employment opportunities in areas of disproportionate impact in North Adams and Worcester with the following programs:

- A. Recruitment and hiring will offer preference to individuals who meet the criteria outlined in the Program Populations listed above.
- B. Postings will be listed with the eMassHire Berkshire Career Center and the Worcester Workforce Central Career Center along with advertisements in the Berkshire Eagle and the Worcester Telegram. These postings will outline our preference to hiring individuals who meet our Program Population. These posting will include a statement encouraging individuals with nonviolent drug convictions or whose parents or spouses have nonviolent drug convictions to apply.
- C. Our website will list all open positions and outline our preference to hiring individuals who meet our Program Population.
- D. Retail Sales Associate wages at the establishment will range from \$15-\$20 per hour which is substantially higher than the current average retail wage of \$12.44 per hour statewide. (Indeed.com August 2018 report from 2088 retail employees in MA).
- E. Employees working at least 30 hours per week or 130 hours per month are eligible to participate in an employer-sponsored health plan. Similarly, paid vacation and sick benefits are available to 30+ hour employees.

All elements of this program will be implemented in their entirety 60 days prior to our planned opening date.

COMMUNITY SERVICE PARTNER PROGRAM

Evergreen Strategies has chosen the South Worcester Neighborhood Improvement Corp. (SWNIC) <http://www.swnic.net/> as our community service partner. SWNIC is a 501(c)(3) charity that serves areas of disproportionate areas, specifically census tracts 731002, 731203, 731204, 731300, 732400, 732700 and 733000 in the City of Worcester. SWNIC is located in census tract 733000. SWNIC services include facilitating access to housing, employment opportunities, health services, education and other social services to the residents of South Worcester.

- A. Evergreen Strategies will make a minimum \$12,000 donation annually to the above-named organization.
 - i. The first donation will occur once we have received provisional licensure form the Commission.
- B. Each 30+ hour employee with 3+ months company tenure will receive 10 hours of paid volunteerism to these organizations. We expect to deliver at least 100 paid volunteer hours to the agency each year.
 - i. The donation of volunteer hours will begin no later than 90 days after we have commenced operations.
- C. Support for SWNIC's food pantry will be encouraged through ongoing staff participation and an annual food drive.
 - i. Our first food drive will be done prior to December 20th of 2019 (if operational) but no later than 45 days after becoming operational.

ECONOMIC EMPOWERMENT MENTORING PROGRAM

Evergreen Strategies will mentor and consult, for no charge, a Commission Designated Economic Empowerment Priority applicant. Being an experienced marijuana operator in the regulated cannabis industry, Evergreen has the ability to use this experience to further their goals of applying for and receiving a License to operate a Marijuana Establishment from the Commission. The services that

we will provide include application services, business plan development, host community engagement, security plan and policy and procedure development as well as general industry advise and consulting. We will provide at least 100 hours annually to this mentoring program.

- A. Evergreen implemented this program in early 2018 and chose KG Collective, LLC as the recipient of our mentoring and consulting services. We have been working with the KG Collective since 2018 and will continue to assist and mentor the KG Collective in securing their first Retail Marijuana Establishment License. To date, Evergreen has provided over 60 hours of mentoring and consulting to the KG Collective in areas of regulatory compliance, site selection, application preparation, business plan development and security planning. We will provide at least 100 additional hours over the next 6 months.
-

4. MEASUREMENTS

Annually, 60 days prior to our License renewal, Evergreen Strategies will conduct a comprehensive written evaluation of the programs outlined above. The purpose of the evaluation will be to measure the goals that are outlined in this Plan. This written evaluation will be available to the Commission for review during the License renewal process.

EMPLOYMENT PROGRAM MEASUREMENTS

Each adult use marijuana dispensary is expected to employ 15 to 20 individuals when fully operational. Program evaluation metrics from the company's talent management database will be evaluated quarterly with the following metrics reported to management:

- A. Number and types of jobs created in the adult-use cannabis industry in geographic areas of disproportionate impact;
- B. The number and percentage of employees that come from disproportionate impacted areas;
- C. The number and percentage of employees that have prior drug convictions or whose parents or spouses have prior drug convictions; and
- D. The number and percentage of applicants who meet the Program Populations, and if not hired, a detailed explanation why they were not hired.

COMMUNITY SERVICE PARTNER MEASUREMENTS

- A. Financial records will demonstrate a minimum \$12,000 donation to our Community Service Partner annually.
- B. Personnel & payroll records will indicate minimum of 100 paid volunteer hours by Evergreen staff.
- C. Documentation of participation in a minimum of one food drive for our Community Service Partner.

ECONOMIC EMPOWERMENT MENTORING PROGRAM MEASUREMENTS

- A. The types of services provided to the KG Collective;
- B. The number of hours spent by the Evergreen Strategies team in providing these services;
- C. The status and progress of the KG Collective with their host community and Commission application; and
- D. Other milestones that have been achieved by KG Collective.

South Worcester Neighborhood Improvement Corporation

47 Camp Street-Worcester, MA 01603 508-757-8344

City Manager Edward Augustus, Jr.

Office of the City Manager

455 Main Street

Worcester, MA 01608

Dear Mr. City Manager,

On August 14, 2018, SWNIC hosted a community meeting featuring the intentions of Evergreen Strategies to open a retail marijuana facility in Worcester on Route 20 near Sunderland Road. The hearing was attended by residents and elected officials, George Russell and Kate Toomey.

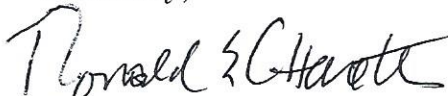
During the hearing, Anthony Parrinello, president of Evergreen, told the group that he plans on a portion of the profits from the sales, will be donated to SWNIC.

The funds will be used to help support our summer youth program, the after school program at Autumn Woods and our South Worcester Sports programs.

The SWNIC Board of Directors has voted to accept this donation and support the application of Evergreen Strategies. Their business model, as explained to us, makes good sense. The board also felt that the financial benefit to the City was impactful.

If there are any questions, please feel free to contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ronald E. Charette". The signature is fluid and cursive, with the first name "Ronald" being more prominent.

Ronald E. Charette

Executive Director

The KG Collective, LLC

1536 Tremont St

Boston, MA 02120

July 1, 2019

Anthony,

The KG Collective, LLC. (EEA201959) is happy and willing to accept Evergreen Strategies no cost mentoring and advising services as part of your Positive Impact Plan, Economic Empowerment Program. We look forward to continuing working with you as both of our Companies move forward through the Cannabis Control Commission's licensing process and becoming operational.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Pires", with a long horizontal flourish extending to the right.

Michael Pires



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

[Special Filing Instructions](#)

Certificate of Organization

(General Laws, Chapter)

Identification Number: 0013177291. The exact name of the limited liability company is: EVERGREEN STRATEGIES LLC

2a. Location of its principal office:

No. and Street: 52 WHISPERING WAYCity or Town: STOW State: MA Zip: 01775 Country: USA

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

No. and Street: 52 WHISPERINGCity or Town: STOW State: MA Zip: 01775 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:

THE GENERAL CHARACTER OF THE BUSINESS OF THE LLC IS TO PROVIDE CONSULTING SERVICES AND ENGAGE IN ANY OTHER BUSINESS WHICH A LLC MAY BE AUTHORIZED TO ENGAGE UNDER THE MASSACHUSETTS LIMITED LIABILITY ACT.

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:

Name: ANTHONY PARRINELLONo. and Street: 52 WHISPERING WAYCity or Town: STOW State: MA Zip: 01775 Country: USA

I, ANTHONY PARRINELLO 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	ANTHONY LAWRENCE PARRINELLO	52 WHISPERING WAY STOW, MA 01775 USA

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

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

SOC SIGNATORY

ANTHONY LAWRENCE PARRINELLO

52 WHISPERING WAY
STOW, MA 01775 USA

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
REAL PROPERTY	ANTHONY LAWRENCE PARRINELLO	52 WHISPERING WAY STOW, MA 01775 USA

9. Additional matters:

SIGNED UNDER THE PENALTIES OF PERJURY, this 15 Day of March, 2018,
ANTHONY PARRINELLO

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

THE COMMONWEALTH OF MASSACHUSETTS

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

March 15, 2018 09:01 PM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

**LIMITED LIABILITY COMPANY OPERATING AGREEMENT
OF
Evergreen Strategies**

This Single-member LLC Operating Agreement represents Evergreen Strategies that was formed in the State of Massachusetts on March 15th 2018, hereinafter known as the "Company".

Anthony Parrinello of 52 Whispering Way, Stow, Massachusetts, 01775 is recognized as the sole member of the Company (the "Member(s)").

NOW, THEREFORE, for good and valuable consideration the receipt and sufficiency of which is hereby acknowledged, it is agreed as follows:

1. Name and Principal Place of Business

The name of the Company is Evergreen Strategies with a principal place of business at 52 Whispering Way, Stow, Massachusetts, 01775. The mailing address shall be the same address as the principal office location.

2. Registered Agent

The name of the Registered Agent is Anthony Parrinello with a registered office located at 52 Whispering Way, Stow, Massachusetts, 01775 for the service of process as of March 15th 2018. This may change at any time by the Company filing an amendment with the Secretary of State, or respective office, in the State of Massachusetts.

3. Formation

The Company was formed on March 15th 2018, when the Member(s) filed the Articles of Organization with the office of the Secretary of State pursuant to the statutes governing limited liability companies in the State of Massachusetts (the "Statutes").

4. Purpose

The purpose of the Company is to engage in and conduct any and all lawful businesses, activities or functions, and to carry on any other lawful activities in connection with or incidental to the foregoing, as the Member(s) in their discretion shall determine.

5. Term

The term of the Company shall be perpetual, commencing on the filing of the Articles of Organization of the Company, and continuing until terminated under the provisions set forth herein.

6. Member(s) Capital Contributions

The Member(s) shall be making a Capital Contribution described as: \$150,000.00 start up capital

7. Distributions.

The Member may make such capital contributions (each a "Capital Contribution") in such amounts and at such times as the Member shall determine. The Member shall not be obligated to make any

Capital Contributions. The Member may take distributions of the capital from time to time in accordance with the limitations imposed by the Statutes.

A "Capital Account" for the Member's shall be maintained by the Company. The Member's Capital Account shall reflect the Member's capital contributions and increases for any net income or gain of the Company. The Member's Capital Account shall also reflect decreases for distributions made to the Member and the Member's share of any losses and deductions of the Company.

8. Books, Records and Tax Returns

The Company shall maintain complete and accurate books and records of the Company's business and affairs as required by the Statutes and such books and records shall be kept at the Company's Registered Office and shall in all respects be independent of the books, records and transactions of the Member.

The Company's fiscal year shall be the calendar year with an ending month of December.

The Member intends that the Company, as a single member LLC, shall be taxed as a S-Corporation in accordance with the provisions of the Internal Revenue Code.

9. Bank Accounts

All funds of the Company shall be deposited in the Company's name in a bank account or accounts as chosen by the Member(s). Withdrawals from any bank accounts shall be made only in the regular course of business of the Company and shall be made upon such signature or signatures as the Member(s) from time to time may designate.

10. Management of the Company

The business and affairs of the Company shall be conducted and managed by a manager in accordance with this Agreement and the laws of the State of Massachusetts.

Anthony Parrinello, as sole member of the Company, has sole authority and power to act for or on behalf of the Company, to do any act that would be binding on the Company, or incur any expenditures on behalf of the Company. The Member shall not be liable for the debts, obligations or liabilities of the Company, including under a judgment, decree or order of a court. The Company is organized as a "member-managed" limited liability company. The Member is designated as the initial managing member.

11. Ownership of Company Property

The Company's assets shall be deemed owned by the Company as an entity, and the Member shall have no ownership interest in such assets or any portion thereof. Title to any or all such Company assets may be held in the name of the Company, one or more nominees or in "street name", as the Member may determine.

Except as limited by the Statutes, the Member may engage in other business ventures of any nature, including, without limitation by specification, the ownership of another business similar to that operated by the Company. The Company shall not have any right or interest in any such independent ventures or to the income and profits derived therefrom.

12. Dissolution and Liquidation

The Company shall dissolve and its affairs shall be wound up on the first to occur of (i) At a time, or upon the occurrence of an event specified in the Articles of Organization or this Agreement. (ii) The determination by the Member that the Company shall be dissolved.

Upon the death of the Member, the Company shall be dissolved. By separate written documentation, the Member shall designate and appoint the individual who will wind down the Company's business and transfer or distribute the Member's Interests and Capital Account as designated by the Member or as may otherwise be required by law.

Upon the disability of a Member, the Member may continue to act as Manager hereunder or appoint a person to so serve until the Member's Interests and Capital Account of the Member have been transferred or distributed.

13. Indemnification

The Member (including, for purposes of this Section, any estate, heir, personal representative, receiver, trustee, successor, assignee and/or transferee of the Member) shall not be liable, responsible or accountable, in damages or otherwise, to the Company or any other person for: (i) any act performed, or the omission to perform any act, within the scope of the power and authority conferred on the Member by this agreement and/or by the Statutes except by reason of acts or omissions found by a court of competent jurisdiction upon entry of a final judgment rendered and un-appealable or not timely appealed ("Judicially Determined") to constitute fraud, gross negligence, recklessness or intentional misconduct; (ii) the termination of the Company and this Agreement pursuant to the terms hereof; (iii) the performance by the Member of, or the omission by the Member to perform, any act which the Member reasonably believed to be consistent with the advice of attorneys, accountants or other professional advisers to the Company with respect to matters relating to the Company, including actions or omissions determined to constitute violations of law but which were not undertaken in bad faith; or (iv) the conduct of any person selected or engaged by the Member.

The Company, its receivers, trustees, successors, assignees and/or transferees shall indemnify, defend and hold the Member harmless from and against any and all liabilities, damages, losses, costs and expenses of any nature whatsoever, known or unknown, liquidated or unliquidated, that are incurred by the Member (including amounts paid in satisfaction of judgments, in settlement of any action, suit, demand, investigation, claim or proceeding ("Claim"), as fines or penalties) and from and against all legal or other such costs as well as the expenses of investigating or defending against any Claim or threatened or anticipated Claim arising out of, connected with or relating to this Agreement, the Company or its business affairs in any way; provided, that the conduct of the Member which gave rise to the action against the Member is indemnifiable under the standards set forth herein.

Upon application, the Member shall be entitled to receive advances to cover the costs of defending or settling any Claim or any threatened or anticipated Claim against the Member that may be subject to indemnification hereunder upon receipt by the Company of any undertaking by or on behalf of the Member to repay such advances to the Company, without interest, if the Member is Judicially Determined not to be entitled to indemnification as set forth herein.

All rights of the Member to indemnification under this Agreement shall (i) be cumulative of, and in addition to, any right to which the Member may be entitled to by contract or as a matter of law or equity, and (ii) survive the dissolution, liquidation or termination of the Company as well as the death, removal, incompetency or insolvency of the Member.

The termination of any Claim or threatened Claim against the Member by judgment, order, settlement or upon a plea of *nolo contendere* or its equivalent shall not, of itself, cause the Member not to be entitled to indemnification as provided herein unless and until Judicially Determined to not be so entitled.

14. Miscellaneous

This Agreement and the rights and liabilities of the parties hereunder shall be governed by and determined in accordance with the laws of the State of Massachusetts. If any provision of this Agreement shall be invalid or unenforceable, such invalidity or unenforceability shall not affect the other provisions of this Agreement, which shall remain in full force and effect.

The captions in this Agreement are for convenience only and are not to be considered in construing this Agreement. All pronouns shall be deemed to be the masculine, feminine, neuter, singular or plural as the identity of the person or persons may require. References to a person or persons shall include partnerships, corporations, limited liability companies, unincorporated associations, trusts, estates and other types of entities.

This Agreement, and any amendments hereto may be executed in counterparts all of which taken together shall constitute one agreement.

This Agreement sets forth the entire agreement of the parties hereto with respect to the subject matter hereof. It is the intention of the Member(s) that this Agreement shall be the sole agreement of the parties, and, except to the extent a provision of this Agreement provides for the incorporation of federal income tax rules or is expressly prohibited or ineffective under the Statutes, this Agreement shall govern even when inconsistent with, or different from, the provisions of any applicable law or rule. To the extent any provision of this Agreement is prohibited or otherwise ineffective under the Statutes, such provision shall be considered to be ineffective to the smallest degree possible in order to make this Agreement effective under the Statutes.

Subject to the limitations on transferability set forth above, this Agreement shall be binding upon and inure to the benefit of the parties hereto and to their respective heirs, executors, administrators, successors and assigns.

No provision of this Agreement is intended to be for the benefit of or enforceable by any third party.

IN WITNESS WHEREOF, the Member(s) have executed this Agreement on March 15th 2018.

The Member(s) of Evergreen Strategies



Anthony Parrinello



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



EVERGREEN STRATEGIES
52 WHISPERING WAY
STOW MA 01775-4502

Why did I receive this notice?

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

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

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

What if I have questions?

If you have questions, call us at (617) 887-6400 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 8:30 a.m. to 4:30 p.m..

Visit us online!

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

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

Edward W. Coyle, Jr., Chief
Collections Bureau



William Francis Galvin
Secretary of the
Commonwealth

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

August 1, 2019

TO WHOM IT MAY CONCERN:

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

EVERGREEN STRATEGIES LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **March 15, 2018.**

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:
ANTHONY LAWRENCE PARRINELLO

I further certify, the names of all persons authorized to execute documents filed with this office and listed in the most recent filing are: **ANTHONY LAWRENCE PARRINELLO**

The names of all persons authorized to act with respect to real property listed in the most recent filing are: **ANTHONY LAWRENCE PARRINELLO**



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

Evergreen Strategies Plan for Obtaining Liability Insurance

Purpose

The purpose of this plan is to outline how Evergreen Strategies will obtain and maintain the required General Liability and Product Liability insurance coverage as required pursuant to 935 CMR 500.105(10), or otherwise comply with this requirement.

Research

Evergreen Strategies has an existing business relationship with an insurance broker (currently operating in the legal marijuana industry) that offers General and Product Liability Insurance coverage in the amounts required in 935 CMR 500.105(10).

Plan

1. Once Evergreen Strategies receives its Provisional Marijuana Establishment License we will engage with our insurance broker. The Evergreen Strategies executive management team has extensive experience in sourcing insurance for state regulated marijuana businesses in the past.
 - a. Evergreen Strategies 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.
 - b. The deductible for each policy will be no higher than \$5,000 per occurrence.
2. In the event that Evergreen Strategies cannot obtain the required insurance coverage, Evergreen Strategies will place a minimum of \$250,000 in an escrow account. These funds will be used solely for the coverage of liabilities.
 - a. Evergreen Strategies will replenish this account within ten business days of any expenditure.
3. Evergreen Strategies will maintain reports documenting compliance with 935 CMR 500.105(10) in a manner and form determined by the Commission and make these reports available to the Commission up request.



Business Plan

City of Worcester
Licensed Retail Marijuana
Establishment Application
Process

I. Executive Summary

The primary motivation in starting Evergreen Strategies was to create a company that generates sufficient revenue to support its employees with substantive living wages, give back to the community in meaningful and lasting ways and provide adequate returns to investors.

We have assembled a team that is experienced in starting up legal, state-regulated cannabis companies in several states throughout the country. This includes raising capital in pre “Cole Memo” environments, entering into states as the initial license winners and following regulations to foster a safe environment for employees and customers.

We have achieved:

- Capital investment of \$250,000 from principals for soft costs related securing real estate, legal fees, professional services and other start-up expenses.
- A executed term sheet with investors for \$5 million dollars that will be disbursed upon receipt of our first executed host agreement. We are currently seeking host agreements for three municipalities including Worcester.

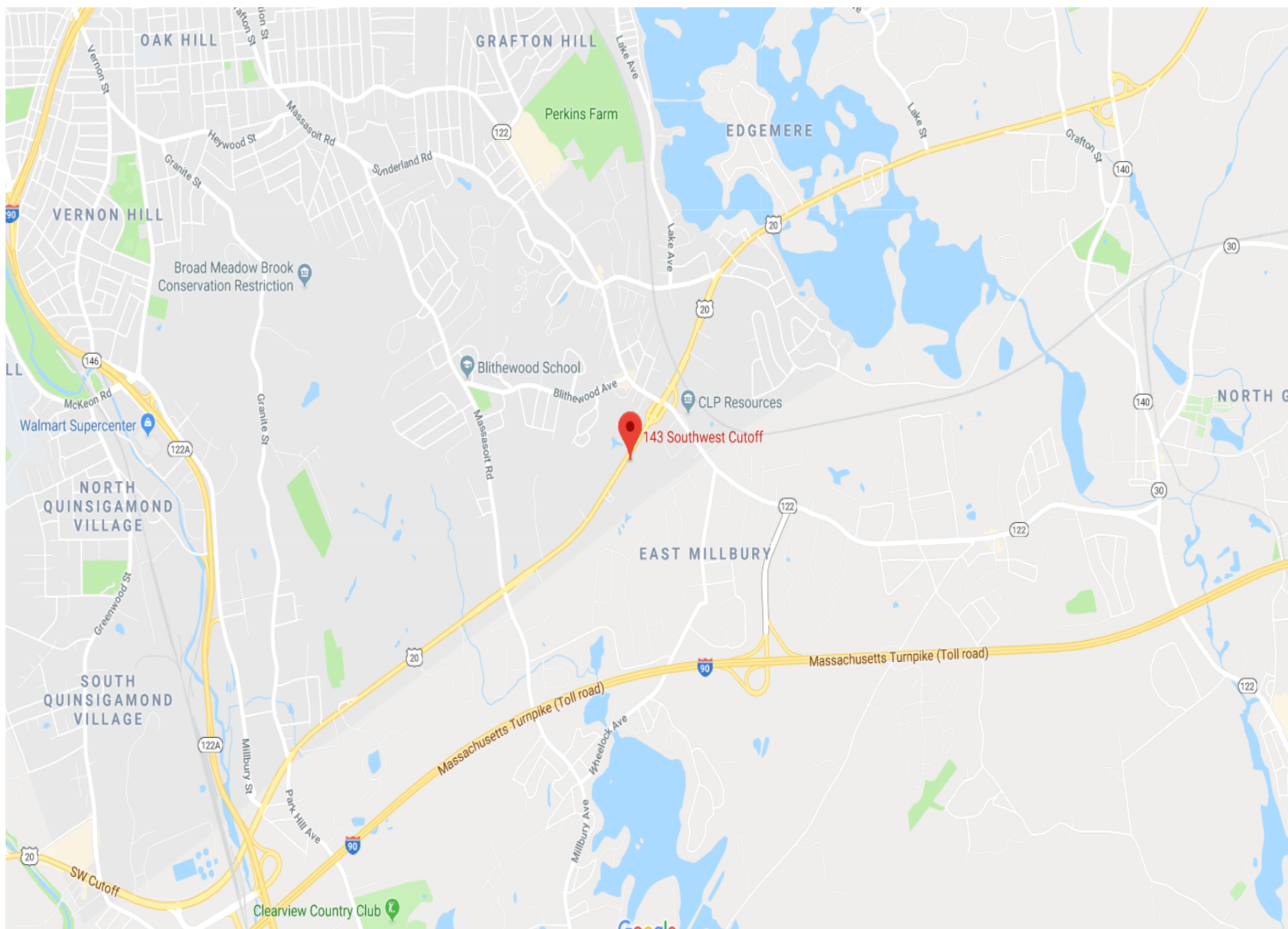
Our track record is strong, our team is competent and can execute in a challenging and competitive environment.

II. Retail Dispensary Description & Timeline

Evergreen Strategies will provide affordable customer access to the highest quality cannabis products and accessories. We will maintain the highest level of security, compassion, and respect for customers, staff and the community.

Our proposed retail location in Worcester is at 143 SW Cutoff. This approximate 3700 sqft facility was purposely selected given the City Manager's directive to Evergreen's President in 2016 to locate along the up and coming Rte. 20 corridor. We believe this location will offer customers easy on/off access and sufficient parking to allow for a convenient and easy customer experience and minimal impact on the City's residents, neighborhoods and public safety services.

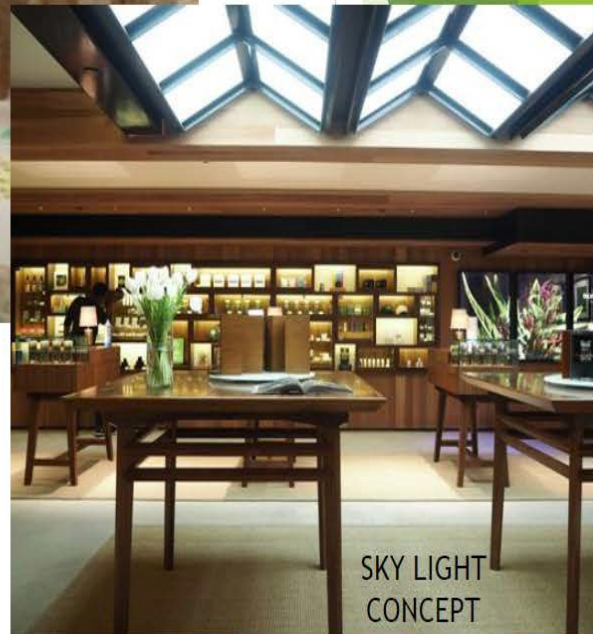
Google Map of 143 SW Cutoff



Proposed Vision of the Interior at 143 SW Cutoff



INTERIOR DESIGN VISION
ORGANIC MATERIALS/ MODERN FEEL



SKY LIGHT
CONCEPT

III. Products and Marketing

In addition to traditional cannabis dispensary products, Evergreen Strategies will offer a wide range of products and services that will allow us to serve as many customers, with as many needs, as possible. Some of the product we intend to offer include, but will not be limited to:

- Topical Salves
- Creams/Lotions
- Patches
- Oral Mucosal/Sublingual Dissolving Tablets
- Tinctures
- Sprays
- Inhalation Ready to Use CO2 Extracted Hash Oils
- Pre-Dosed Oil Vaporizers
- Ingestion Capsules
- Food/Beverages- gluten free, vegan and sugar free options

The types of flower we plan on offering:

Sativa

- Uplifting and energetic
- Best suited for day-time use

Indicia

- Relaxing and calming, sedating
- Best suited for night-time use

Hybrid

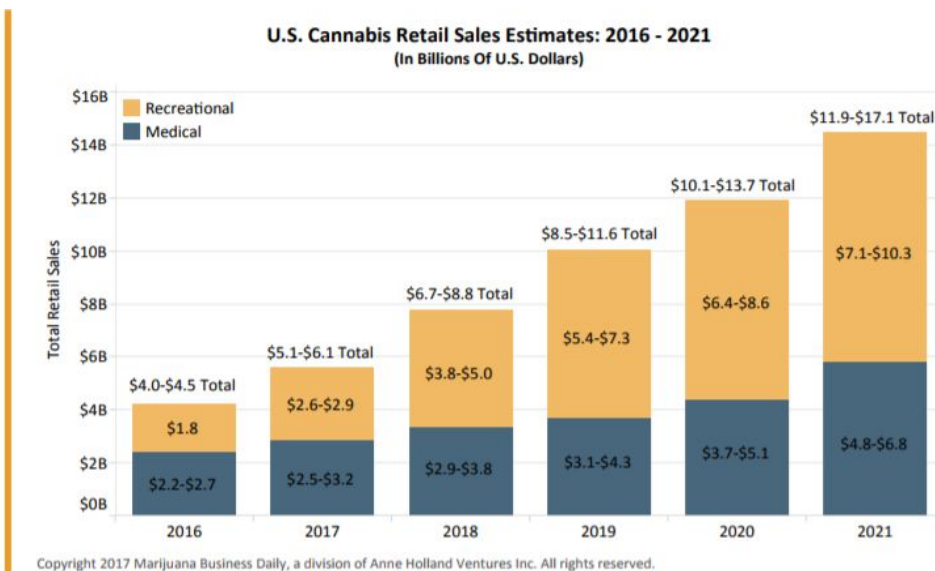
- Crosses of Sativa and Indica
- Allows cultivators to select desired effects
- Indica dominant is for pain relief
- Sativa dominant helps with energy and activity levels

IV. Market Opportunity

I: Business/Industry Overview: The Cannabis Industry in America

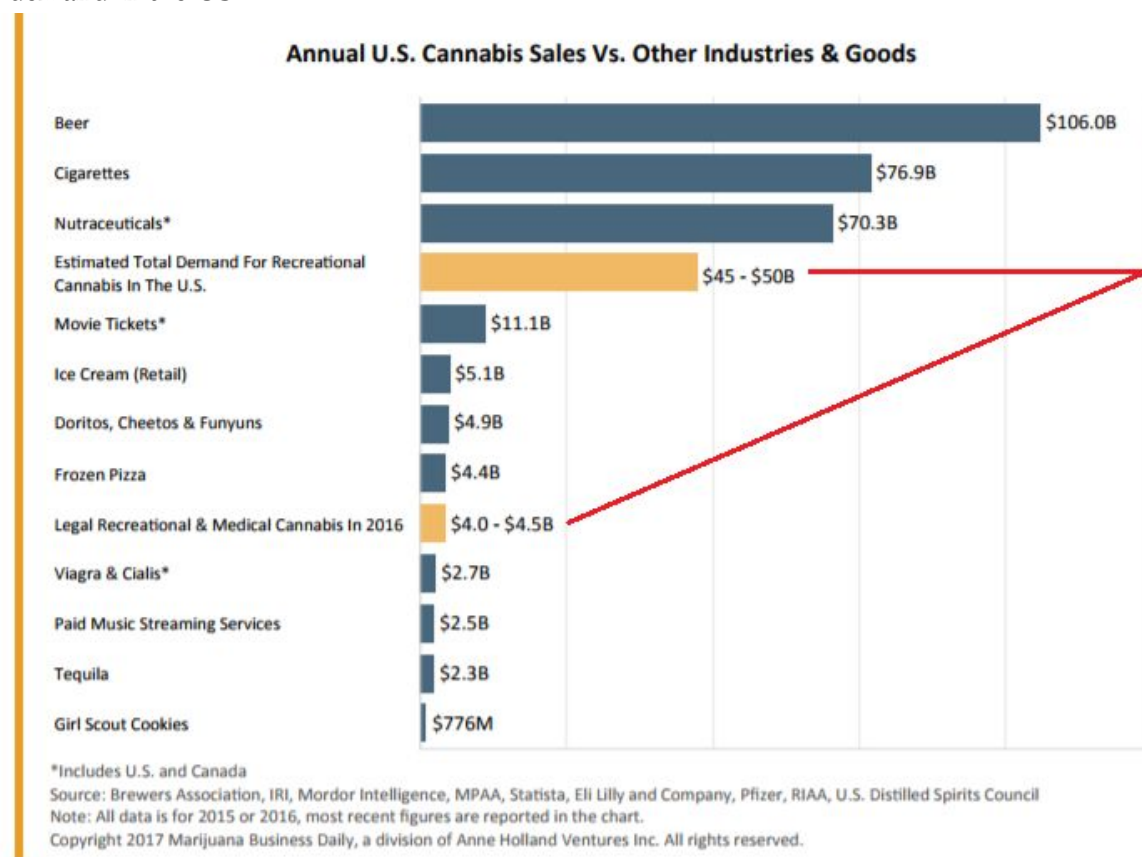
According to recent Gallup surveys, 64% of respondents support the legalization of cannabis in America--an astounding 52% increase from 1969.³ Although this shift in sentiment has yet to be fully reflected on the Federal level, 29 states currently have adopted some form of normalization, with 8 more poised to join in 2018.

While experts may argue about the potential size of the industry over the next decade, even the most fervent hawk's estimates are bound to be pretty staggering.



According to Gateway Incubator (the Y Combinator for the “non-leaf touching” cannabis space), legal cannabis sales are expecting to see 35% growth in 2018--a highly unusual occurrence for industries larger than \$5bn. To illustrate it's magnitude by comparison, cable television grew at 19%/yr. in the early 90's, and e-commerce 1.0 grew at 26%/yr. in the early aughts.⁴ Although a portion of this growth can be attributed to the pro-cannabis sentiment that has permeated cultural zeitgeist, this isn't the industry's biggest tailwind.

As the following chart shows, there's currently an estimated \$45-50bn in pent-up black-market demand in the US:



These “non-compliant consumers” will continue to switch to regulated markets as more states normalize, and as the quality, safety and variety of legal and lawful cannabis products improve.

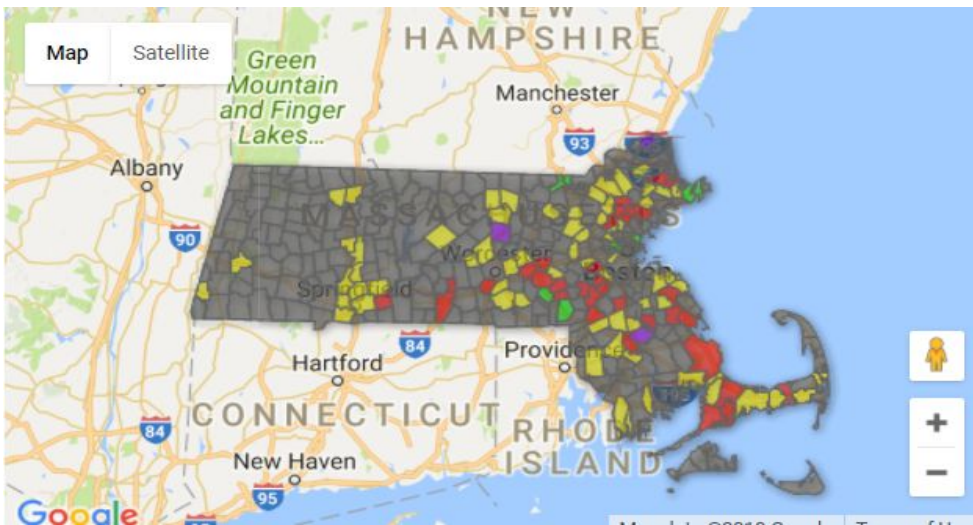
The Cannabis Industry in Massachusetts

Massachusetts pot business a 'gold mine'

Jordan Graham Friday, October 06, 2017

Massachusetts has been progressive, for an east coast state, in its path towards normalization. After decriminalizing “simple possession” in 2008, the voters approved a medical cannabis ballot initiative in 2012 and voted for creating a well-regulated Adult Use market in 2016 (with licensure beginning this year). Currently however, only 19 of the 75 non-profit medical Registered Marijuana Dispensaries (RMDs) that received licenses have actually opened their doors.⁵ Apparently, many licensees delayed their plans, wagering that their medical status would give them priority review for the new (for profit) adult use classification-- leaving 45,500 patients forced to make long drives to purchase medicine. This stress may be alleviated for some patients as the first adult use retail stores are permitted to open in July 2018 in some municipalities, but the roll out is expected to be slow. Many towns have ignored the promising data from CO, OR and WA and citing “not in my backyard” concerns, have issued moratoriums restricting or banning retail stores.^{6 7}

Red: ban / Yellow: moratorium



This doesn't bode well for consumers initially, as producers are anticipated to enjoy strong pricing power.

"The fundamental problem is we're coming into the recreational market with not as developed or as mature a medical program as we had seen in other states," notes Adam Fine, an attorney with Vicente Sederberg. "We don't have currently cultivation capabilities to keep even close to the anticipated high demand once the first recreational marijuana retailers open up." 8

"The first places to open up will sell out in less than a week," predicted Peter Bernard, president of the Massachusetts Grower Advocacy Council.

New Frontier Data, a cannabis industry analytics firm based in Washington, D.C. projects Massachusetts to transact \$450 million of cannabis sales in 2018, accelerating to \$1.17 billion by year 2020, and \$1.70bn by 2021. By 2025, The Commonwealth is expected to transact 8% of total cannabis sales nationwide (currently 290,000-453,000lb/yr. based on our analysis, excluding canna-tourism)--creating over 17,000 new jobs in both primary and secondary (non leaf-touching) sectors.

V. Management and Organization

Anthony Parrinello *President and Chief Executive Officer*

Mr. Parrinello is a leader in the Massachusetts and New Hampshire non-profit medical marijuana industry. For the last five years Mr. Parrinello has developed deep expertise as a RMD applicant, investor, and executive. Having visited and analyzed over 30 production, processing and retail facilities in states that have passed marijuana laws, Mr. Parrinello gained insight into facility design, workflow optimization and best practices in retail management. As the Chief Operating Officer for Milford Medicinals (now known as Sira Naturals) , a Milford MA based licensed RMD, he led the facility design and construction related vendor selection process. During his tenure at Milford, he also helped the organization on developing appropriate cannabis specific non-profit corporate governance structures and policies and helped fundraise \$7 million for start-up, build out and ramp up expenses.

As the founding CEO of Temescal Wellness NH and MA. Mr. Parrinello was responsible for day to day operations, finance, government relations, compliance, marketing and personnel. During his tenure with Temescal, Mr. Parrinello led the buildout of a NH cultivation and two retail locations, recruited, hired and trained a cultivation and retail team that provided therapeutic cannabis, for two of the four state issued licenses. In Temescal's bid to develop the Massachusetts's market, Mr. Parrinello led the community outreach effort in working with municipal leaders in Hudson, Framingham and Pittsfield MA to site retail locations and Worcester to site a 20,000 sqft cultivation facility.

Mr. Parrinello also has deep experience in providing healthcare services for major academic medical centers, community hospitals and multi-specialty physician groups in the state of Massachusetts, requiring extensive knowledge of healthcare operations, HIPAA compliance and patient safety regulations.

Mr. Parrinello has a B.S. in marketing from Siena College and a MBA from Boston College. He is also an Eagle Scout and resides in Stow Massachusetts with his wife and two daughters.

Jean Welsh, *Chief Talent and Customer Experience Officer*

Dr. Welsh is a seasoned healthcare and education executive with decades of experience in social entrepreneurship. She has successfully managed rapid-growth companies such as Prism Health Group and Senior link in highly regulated environments requiring strict compliance to standards. Prior to joining the cannabis industry, Dr. Welsh worked at Lexia Learning, a division of Rosetta Stone, Inc. where she developed new technologies for staff training that yielded nationwide efficiencies.

Over the past several years, Dr. Welsh has played an active role in the legal marijuana industry in Massachusetts. Her advocacy efforts focus on the role of cannabis in opioid harm reduction and the inclusion of women and minorities in the emerging industry. She holds a doctorate in education from Auburn University majoring in Rehabilitation and a BA from Bucknell University.

Additionally, she is a 2016 graduate of the Northeastern Institute of Cannabis and is an avid student of cannabinoid medicine research and caregiver best practices.

Alan Barber, *Chief Financial Officer*

Alan T. Barber is principal of the Prestar Group, a consulting practice providing CFO services to early stage and mid-market companies in the New England area. He is a CPA and began his career with Pricewaterhouse Coopers. As a partner in the Firm's Dallas and Tokyo offices his responsibilities included such leadership roles as Mergers & Acquisitions Practice Leader for the Southwest Region and Partner-in-Charge of the Foreign Financial Services practice for Japan. After 17 years in public accounting, Alan spent 12 years as the CFO of various venture-backed companies in New England including Ergo Science, Medical Foods, MyWay.com, Innovative Chain, Omnisonics Medical and BioTrove. In 2005, Alan started the Prestar Group to provide CFO consulting services. As a seasoned CFO he has provided the financial management as well as assisting the CEO, executive team, and board of directors with the strategic business planning and with creatively addressing a broad range of business and operating challenges.

Alan received a Bachelor of Science Degree in Accounting from Florida State University, Rovetta School of Business.

Mike Rego, *Director of Security & Compliance*

Michael Rego has been professionally involved in the medical marijuana industry for 7 years. In 2011, he co-founded Patient First Initiative (PFI), which is a collective that delivers services to state-registered patients. Mr. Rego supervised the physical construction of PFI's MMJ cultivation site, including design and implementation of security surveillance, monitoring and alarm systems. Mr. Rego served as Director of Security at Greenleaf Compassionate Care Center, a Rhode Island dispensary, through its startup and first 20 months of operations. Mr. Rego's leadership role at Greenleaf included planning, designing and implementing physical security surveillance, monitoring and alarm system, with full remote viewing and monitoring capabilities. He created procedures and protocols involving theft and diversion prevention for retail and cultivation areas. Mr. Rego served as liaison to state and local law enforcement agencies. He provided employee orientation and training including security procedures for theft prevention, emergency evacuation procedures and basic first-aid. In addition to his tenure at Greenleaf in Rhode Island, Mr. Rego served as the Director of Security for Temescal Wellness of Massachusetts, New Hampshire and Maryland. Mr. Rego has 17 years of law enforcement experience where he served as a Detective with the Newport Rhode Island Police Department.

Howe Riley Howe, CPA

Howe Riley Howe (HRH) is a New Hampshire based CPA firm with offices in Portsmouth and Bedford. Employing over 50 staff, HRH is the largest accounting firm headquartered in New Hampshire. As a full-service tax and accounting firm, HRH has substantive cannabis audit and tax preparation experience in legal state markets. HRH ensures their services are of the utmost quality by participating in American Institute of CPA's Peer Review Program. This professional oversight confirms that HRH adheres to professional standards in their accounting and audit practices.

VI. Financial Projections

Three Year Projection

	<u>2019</u>	<u>2020</u>	<u>2021</u>
Revenues	\$4,240,099	\$5,712,729	\$6,159,317
Operating Costs			
Payroll	588,230	639,090	688,397
Host Community Payments - Worcester	127,202	171,382	184,780
South Worcester Neighborhood Improvement Corp. (anticipated)	12,000	25,000	25,000
Other	1,456,869	2,442,897	2,273,544
Total Operating Costs	<u>2,184,301</u>	<u>3,278,369</u>	<u>3,171,721</u>
EBITDA	<u>\$2,055,798</u>	<u>\$2,434,360</u>	<u>\$2,987,596</u>

Clear Sky Cannabis Plan for Separating Recreational from Medical Operations

Clear Sky Cannabis is a retail establishment and will not operate as a Medical-Use of Marijuana MTC.

Restricting Access to Age 21 and Older

Intent

Clear Sky Cannabis Retail Marijuana Establishment operations will be 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 (“CNB”) or any other regulatory agency.

Purpose

The purpose of this policy is to outline the responsibilities of the Company, the Company’s management team and Agents to ensure specific, methodical, and consistent compliance of the Regulations and to ensure that access to our facility is restricted to only persons who are 21 years of age or older.

Definitions

- **Consumer** means a person who is 21 years of age or older.
- **Law Enforcement Authorities** means local law enforcement unless otherwise indicated.
- **Marijuana Establishment Agent** means a board member, director, employee, executive, manager, or volunteer of a Marijuana Establishment, who is 21 years of age or older. Employee includes a 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.
- **Proof of Identification** means a government issued photograph that contains the name, date of birth, physical description and signature of the individual and is currently valid (in other words, not expired). Clear Sky Cannabis will only accept the following forms of proof of identification that include all of the above criteria;
 1. Massachusetts driver’s license
 2. Massachusetts Issued ID card
 3. Out-of-state driver’s license or ID card
 4. Government issued Passport
 5. U.S. Military I.D.
- **Visitor** means an individual, other than a Marijuana Establishment Agent authorized by the Marijuana Establishment, on the premises of an establishment for a purpose related to its operations and consistent with the objectives of St. 2016, c. 334, as amended by

St. 2017, c. 55 and 935 CMR 500.000, provided, however, that **no such individual shall be younger than 21 years old.**

Responsibilities

Clear Sky Cannabis Management team is responsible for ensuring that all persons who enter the facility or are otherwise associated with the operations of Clear Sky Cannabis are 21 years of age or older.

Access to the Facility

Clear Sky Cannabis retail facilities allow only the following individuals access. For the purposes of this Policy, the term facility also refers to any vehicle owned, leased, rented or otherwise used by Clear Sky Cannabis for the transportation of Marijuana.

1. Clear Sky Cannabis Agents (including board members, directors, employees, executives, managers, or volunteers) while at the facility or transporting marijuana for the facility all Clear Sky Cannabis Agents must carry their valid Agent Registration Card issued by the Commission.
 - a. All Clear Sky Cannabis Agents are verified to be 21 years of age or older prior to being issued a Marijuana Establishment Agent card.
2. Customers/Consumers (Note: All Agents will be trained in the Verification and Identification of individuals):
 - a. To verify a customer is 21 or older Clear Sky Cannabis Agents must receive and examine from the customer one of the following authorized government issued ID Cards;
 - i. Massachusetts Issued driver's license
 - ii. Massachusetts Issued ID card
 - iii. Out-of-state driver's license or ID card (with photo)
 - iv. Passport
 - v. U.S. Military I.D.
 - b. To verify the age of the customer the Agent will use an Age Verification ID Scanner that will be supplied by Clear Sky Cannabis.
 - c. In the event that the ID is not a scannable ID, or if for any reason the scanner is not operational or available or if the ID is questionable the Agent must use the **FLAG** methodology of ID verification

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

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 ID's

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.

G. Give Back

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

- d. 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.

3. Visitors (including outside vendors and contractors)

- a. 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.
 - i. If there is any question as to the visitors age, or if the visitor cannot produce a Government Issued Identification Card, they will not be granted access.
- b. After the age of the visitor is verified they will be given a Visitor Identification Badge
- c. Visitors will be escorted at all times by a marijuana establishment agent authorized to enter the limited access area.
- d. Visitors will be logged in and out of the facility and must return the Visitor Identification Badge upon exit.
 - i. The visitor log will be available for inspection by the Commission at all times

4. Access to the Commission, Emergency Responders and Law Enforcement.

- a. The following individuals shall have access to a Marijuana Establishment or Marijuana Establishment transportation vehicle:
 - i. Representatives of the Commission in the course of responsibilities authorized by St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000;
 - ii. Representatives of other state agencies of the Commonwealth; and
 - iii. Emergency responders in the course of responding to an emergency.
 - iv. Law enforcement personnel or local public health, inspectional services, or other permit-granting agents acting within their lawful jurisdiction.
- b. Individuals described above in this policy will be granted immediate access to the facility.

I. **Training**

Clear Sky Cannabis 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.

All Clear Sky Cannabis Agents will enroll and complete the Responsible Vendor Training Program when it is available. This curriculum will include:

- a. Diversion prevention and prevention of sales to minors;
- b. Acceptable forms of identification. Training shall include:
 - i. How to check identification;
 - ii. Spotting and confiscating fraudulent identification;
 - iii. Patient registration cards currently and validly issued by the Commission;
 - iv. Common mistakes made in identification verification.
 - v. Prohibited purchases and practices, including purchases by persons under the age of 21 in violation of M.G.L. c. 94G, § 13.



**EVERGREEN STRATEGIES, LLC
DBA CLEAR SKY CANNABIS**

DIVERSITY AND INCLUSION PLAN

Evergreen Strategies is committed to a culture where all people are represented, respected and appreciated. Diversity is a core value of the company because it broadens our skill base and helps us become more competitive and innovative. Moreover, Evergreen recognizes our responsibility to promote a society where underrepresented groups get their fair share of opportunities.

At Evergreen Strategies, we are committed to providing equitable employment opportunities to all applicants and employees without regard to race, gender, national origin, age, sexual orientation, marital status, pregnancy, disability, genetic information, religion or any other non-merit factor.

Evergreen Strategies acknowledges and is aware, and 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 and that any actions taken, or programs instituted, will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

1. PROGRAM POPULATIONS

The Program in this plan will be tailored to the following populations:

- A. Minorities;
- B. Women;
- C. Veterans;
- D. People with disabilities; and
- E. People who are LBGTQ+.

2. DIVERSITY GOALS

The company plans to hire and retain a diverse workforce that promotes and celebrates people of all types including minorities, women, veterans, people with disabilities and people who are LBGTQ+. Recognizing the modest size of a dispensary staff (15-20), we expect to achieve the following diversity employment targets.

- A. For all of our Retail Establishment our goal is that 55% of our employees will be female.
- B. For our Worcester Retail Establishment, 60% of our employees will fall into Sections A, C, D and E of the Program Populations outlined in Section 1. (~45% of the Worcester Population is a minority.)
- C. For our North Adams Retail Establishment 40% of our employees will fall into Sections A, C, D and E of the Program Populations outlined in Section 1. (~10% of the North Adams Population is a minority.)

3. HIRING PROGRAM

Evergreen Strategies will give preference in the hiring of employees to those who meet the criteria outlined in Section 1. In an effort to source employees who meet the Program Populations, Evergreen Strategies will:

- A. Develop recruitment materials that emphasize our commitment to hiring a diverse workforce and use images that reflect people of different ethnicities and backgrounds.
- B. Job postings will be written in gender neutral language and explicitly state the company's hiring preference and display a meaningful inclusivity statement.
 - a. Postings will be listed with the MassHire Berkshire Career Center and the Worcester Workforce Central Career Center and the company will participate in job fairs associated with each local Career Center.
- C. Job fairs will be held approximately 60 days prior to our expected opening date for each of our retail establishments.
 - a. Second and subsequent job fairs will be held as employment needs necessitate.
- D. We will actively support industry trade groups that promote diversity and inclusion. We will participate in hiring and recruitment initiatives that these groups sponsor. These groups include:
 - a. The Massachusetts Cannabis Business Association (Mass CBA)
 - b. Massachusetts Recreational Consumer Council (MRCC)
 - c. Elevate Northeast
- E. All managers will participate in annual training to uncover and help mitigate unconscious bias. Interview teams will reflect diversity among our employees whenever possible.
- F. All managers will receive training in diversity hiring practices prior to the

hiring of employees. This training will be done through Diversity Resources <https://www.diversityresources.com/>

- G. Our hiring processes will minimize bias by allowing hiring managers to focus only on factors that have a direct impact on performance. These processes include:
- a. Advanced training to our Hiring Managers and Human Resources teams;
 - i. This training will be done through Diversity Resources <https://www.diversityresources.com/> annually.
 - b. Using gender neutral language in all posting and recruitment materials;
 - c. Blind resumes and applications. Prior to the hiring team evaluating resumes or application materials, the names, ethnicities, addresses and other personal information that could lead to unconscious bias will be removed.
 - d. Standardized interviews and scoring.

4. MEASUREMENTS

Annually, 60 days prior to our License renewal, Evergreen Strategies will conduct a comprehensive written evaluation of the program outlined above. The purpose of the evaluation will be to measure the goals that are outlined in this Plan. This written evaluation will be available to the Commission for review during the License renewal process.

Each adult use marijuana dispensary is expected to employ 15 to 20 individuals when fully operational. Program evaluation metrics from the company's talent management database will be evaluated quarterly with the following metrics reported to management:

- A. Number and types of hires for each retail establishment;
- B. The number and percentage of hires that meet the Program Populations outlined in Section 1;
- C. The number and percentage of employees that come from disproportionate impacted areas;
- D. The number and percentage of applicants who meet the Program Populations, and if not hired, a detailed explanation why they were not hired; and
- E. Training records for all Diversity training completed by Evergreen Strategies employees.

Agent Qualifications and Training

Intent

To provide clear and concise instructions for Clear Sky Cannabis employees regarding the qualifications for employment and agent training that are compliant with the regulations.

Clear Sky Cannabis 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 (“CNB” or “the Commission”) or any other regulatory agency.

Purpose

The purpose of this policy is to outline the responsibilities of the Company, the Company’s management team and Agents to ensure specific, methodical, and consistent compliance of the Regulations and to ensure that we only hire qualified Marijuana Establishment Agents and that our training process and curriculum are in compliance with all regulations and laws.

Qualifications for aa Clear Sky Cannabis Marijuana Establishment Agent

The minimum requirements to become a Clear Sky Cannabis’ Marijuana Establishment Agent (“Agent”) are outlined below. All Clear Sky Cannabis 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 Clear Sky Cannabis Agents must;

1. Be 21 years of age or older;
2. Have not been convicted of any felony drug offense in the Commonwealth or a like violation of the laws of an Other Jurisdiction;
3. Have not been convicted of any offense involving the distribution of controlled substances to a minor or a like violation of the laws of an Other Jurisdiction; and
4. Be determined to be suitable for registration consistent with the provisions of 935 CMR 500.800, 935 CMR 500.801 or 935 CMR 500.803.

Clear Sky Cannabis 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 based on the specific duties of the position.

Required Training for Clear Sky Cannabis Agents

Pursuant to 935 CMR 500.105(2)(a) Clear Sky Cannabis will ensure all Clear Sky Cannabis Agents complete training prior to performing job functions. Training will be tailored to the role and responsibilities of the job function.

1. Clear Sky Cannabis will train all marijuana establishment agents in compliance with 935 CMR 500.105(2)(a) and (b). Agents responsible for tracking and entering products into the Seed-to-sale SOR (Metrc) must receive training in a form and manner determined by the Commission.
2. 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 Offences;
 - 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. Code of ethics
 - iii. Whistle-blower policy
 - iv. Equal Employment Policy;
 - v. Anti-Harassment and Sexual Harassment Policy;
 - vi. Americans with Disability Act;
 - vii. Employee Assistance Policy; and
 - viii. Diversity Plan
3. 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.
4. All Clear Sky Cannabis Agents will receive a minimum of 16 hours of training annually.
5. Clear Sky Cannabis 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 Clear Sky Cannabis for at least one year after agents' termination.

6. Within 90 days of hire, Clear Sky Cannabis will require all of its Agents to attend and complete at least 4 hours of e Basic Core Curriculum training from the Responsible Vendor Training Program to become designated as a "responsible vendor"
7. This Basic Core Curriculum will cover
 - a. Marijuana's effect on the human body, including:
 - i. Scientifically based evidence on the physical and mental health effects based on the type of Marijuana Product;
 - ii. The amount of time to feel impairment;
 - iii. Visible signs of impairment; and
 - iv. Recognizing the signs of impairment
 - b. Diversion prevention and prevention of sales to minors, including best practices.
 - c. Compliance with all tracking requirements.
 - d. Acceptable forms of identification. Training shall include:
 - i. How to check identification;
 - ii. Spotting and confiscating fraudulent identification;
 - iii. Patient registration cards currently and validly issued by the Commission;
 - iv. Common mistakes made in identification verification.
 - v. Prohibited purchases and practices, including purchases by persons under the age of 21 in violation of M.G.L. c. 94G, § 13.
 - e. Other key state laws and rules affecting Marijuana Establishment Agents, which shall include:
 - i. Conduct of Marijuana Establishment Agents;
 - ii. Permitting inspections by state and local licensing and enforcement authorities;
 - iii. Local and state licensing and enforcement, including registration and license sanctions;
 - iv. Incident and notification requirements;
 - v. Administrative, civil, and criminal liability;
 - vi. Health and safety standards, including waste disposal;

- vii. Patrons prohibited from bringing Marijuana and Marijuana Products onto licensed premises;
 - viii. Permitted hours of sale;
 - ix. Licensee responsibilities for activities occurring within licensed premises;
 - x. Maintenance of records, including confidentiality and privacy; and
 - f. Such other areas of training determined by the Commission to be included in a Responsible Vendor Training Program
 - g. After the responsible vendor designation is applied each Clear Sky Cannabis 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.”
8. Clear Sky Cannabis will maintain records of compliance with all training requirements noted above. Such records will be maintained for four years and such records available for inspection on request.
9. All retail employees will be trained on:
- a. Safety and Security;
 - b. Disaster plan;
 - c. Privacy ;
 - d. Cash handling;
 - e. Diversion prevention and prevention of sales to minors, including best practices;
 - f. Compliance with all tracking requirements;
 - g. Acceptable forms of identification. Training shall include:
 - h. How to check identification;
 - i. Spotting false identification; and
 - j. Common mistakes made in verification

Additional Training

Clear Sky Cannabis will provide training and training opportunities to its employees. In addition to required training, Clear Sky Cannabis 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.

Maintenance of Financial Records

Intent

To provide clear and concise instructions for Clear Sky Cannabis employees regarding the Maintenance of Financial Records that are compliant with the regulations.

Clear Sky Cannabis 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 (“CNB” or “the Commission”) or any other regulatory agency.

Purpose

The purpose of this policy is to outline the responsibilities of the Company, the Company’s management team and agents to ensure specific, methodical, and consistent compliance of the regulations and to ensure that our financial records are maintained in a compliant manner with all regulations and laws.

Policy

Clear Sky Cannabis financial records will be kept and maintained according to generally accepted accounting principles. The Finance Director is responsible for all accounting responsibilities and will engage the services of external professional accounting firm to ensure proper financial compliance.

All Clear Sky Cannabis financial/business records will be available for inspection to the Cannabis Control Commission upon request.

Clear Sky Cannabis will maintain all business records in Manual and electronic form. These records include, but are not limited to;

1. Assets and liabilities;
2. Banking transactions;
3. Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
4. Sales records including the quantity, form, and cost of marijuana products; and
5. Salary and wages paid to each employee, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the nonprofit corporation, if any.

In relation to the maintenance of financial records Clear Sky Cannabis will incorporate the following into our business operations;

1. Clear Sky Cannabis will engage the services of a professional payroll and human resources company to assist in human resources management and payroll services for our employees
2. Clear Sky Cannabis will engage, to the extent possible, a banking relationship in Massachusetts to provide banking services for our company.
3. Clear Sky Cannabis will utilize financial/accounting software programs and an e-bill payment provider for all financial record keeping.
4. All inter-LME transactions will be done through traditional banking transactions including checks, wire transfers or credit cards.
5. On an annual basis an independent certified public accountant who is experienced in the legal marijuana industry, will conduct a financial audit.
6. Clear Sky Cannabis will engage the services of an industry experienced tax professional for the filing of all required state and federal tax documents.
7. At the end of each business day a reconciliation audit will be done on each POS station by the Retail Manager or designee.
8. A comprehensive financial audit will be done at the end of every month by the Finance Director and report their findings to the CEO and outside accounting firm.

Access to the Commission

Clear Sky Cannabis electronic and hard copy (written) records will be available to the Commission upon request pursuant to 935 CMR 500.105(9). The records will be maintained in accordance with generally accepted accounting principles. All written records required in any section of 935 CMR 500.000 are subject to inspection.

Access to the Massachusetts Department of Revenue ("DOR")

Clear Sky Cannabis books, records, papers and other data will be made available upon request by the DOR. Accounting records and information in electronic format will be provided in a searchable electronic format if requested by the Commission or 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 as well as any additional purchase reports, schedules or documentation that reconcile to other books and records, such as purchase journals or a general ledger, will also be maintained and made available upon request.

These records will be kept so long as their contents are material in the administration of Massachusetts and IRS tax laws. At a minimum, unless the DOR Commissioner consents in writing to an earlier destruction, the records will be preserved until the statute of limitations for making additional assessments for the period for 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.

Additionally, Clear Sky Cannabis will comply with all records retention requirements outlined in the DOR Regulations including but limited to 830 CMR 62C.25.1: Record Retention.

Point of Sale (POS) Systems

Clear Sky Cannabis will utilize a POS system that complies with the requirements in G.L. c. 62C, § 25; 830 CMR 62C.25.1 (the Records Retention Regulation); and the Massachusetts Department of Revenue (“DOR”) Directive 16-1 “*Recordkeeping Requirements for Sales and Use Tax Vendors Utilizing Point of Sale (POS) Systems*”

1. Our POS system will record all transactions in a manner that will allow the DOR to verify what was sold and whether the appropriate amount of tax was collected. Along with the data in the POS system, Clear Sky Cannabis will maintain the following records:
 - a. A journal or its equivalent, which records daily all non-cash transactions affecting accounts payable;
 - b. A cash journal or its equivalent, which records daily all cash receipts and cash disbursements, including any check transactions;
 - c. A sales slip, invoice, cash register tape, or other document evidencing the original transaction, which substantiates each entry in the journal or cash journal;
 - d. Memorandum accounts, records or lists concerning inventories, fixed assets or prepaid items, except in cases where the accounting system clearly records such information; and
 - e. A ledger to which totals from the journal, cash journal and other records have been posted. The ledger must clearly classify the individual accounts receivable and payable and the capital account.
2. Each POS transaction record will provide enough detail to independently determine the taxability of each sale and the amount of tax due and collected. Information on each sales transaction will include, but is not limited to the:
 - a. individual item(s) sold,
 - b. selling price,
 - c. tax due,
 - d. invoice number,
 - e. date of sale,
 - f. method of payment, and
 - g. POS terminal number and POS transaction number.
3. Clear Sky Cannabis will maintain auditable internal controls to ensure the accuracy and completeness of the transactions recorded in the POS system. The audit trail details include, but are not limited to:
 - a. Internal sequential transaction numbers;

- b. Records of all POS terminal activity; and
 - c. Procedures to account for voids, cancellations, or other discrepancies in sequential numbering.
 - d. The POS audit trail or logging functionality must be activated and operational at all times, and it must record:
 - e. Any and all activity related to other operating modes available in the system, such as a training mode; and
 - f. Any and all changes in the setup of the system.
4. Clear Sky Cannabis will comply with the provisions of 935 CMR 500.140(6): Recording Sales.
- a. Clear Sky Cannabis will only utilize a point-of-sale (POS) system approved by the Commission, in consultation with the DOR.
 - b. Clear Sky Cannabis may utilize a sales recording module approved by the DOR.
 - c. Clear Sky Cannabis will not utilize software or other methods to manipulate or alter sales data.
 - d. Clear Sky Cannabis will conduct a monthly analysis of our 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. Clear Sky Cannabis will maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If Clear Sky Cannabis 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:
 - i. We will immediately disclose the information to the Commission;
 - ii. We will cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and
 - iii. We will take such other action directed by the Commission to comply with 935 CMR 500.105.
 - e. Clear Sky Cannabis will comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements.
 - f. Clear Sky Cannabis will adopt separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales.
 - g. Clear Sky Cannabis will allow the Commission and the DOR may audit and examine our point-of-sale system in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.105.

Record Keeping Procedures

Intent

To provide clear and concise instructions for Clear Sky Cannabis employees regarding record keeping that are compliant with the regulations.

Clear Sky Cannabis 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 (“CNB” or “the Commission”) or any other regulatory agency.

Purpose

The purpose of this policy is to outline the responsibilities of the Company, the Company’s management team and agents to ensure specific, methodical, and consistent compliance of the regulations and to ensure that our record keeping procedures are compliant with all regulations and laws.

Access to the Commission

Clear Sky Cannabis electronic and hard copy (written) records will be available to the Commission upon request pursuant to 935 CMR 500.105(9). The records will be maintained in accordance with generally accepted accounting principles. All written records required in any section of 935 CMR 500.000 are subject to inspection.

Access to the Massachusetts Department of Revenue (“DOR”)

Clear Sky Cannabis’ books, records, papers, and other data will be made available upon request by the DOR Accounting records and information in electronic format will be provided in a searchable electronic format if requested by the Commission of 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 as well as any additional purchase reports, schedules or documentation that reconcile to other books and records, such as purchase journals or a general ledger, will also be maintained and made available upon request.

These records will be kept so long as their contents are material in the administration of Massachusetts tax laws. At a minimum, unless the DOR Commissioner consents in writing to an earlier destruction, the records will be preserved until the statute of limitations for making additional assessments for the period for 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.

Additionally, Clear Sky Cannabis will comply with all records retention requirements outlined in the DOR Regulations including but limited to 830 CMR 62C.25.1: Record Retention.

1. Point of Sale (POS) Systems

Clear Sky Cannabis will utilize a POS system that complies with the requirements in G.L. c. 62C, § 25; 830 CMR 62C.25.1 (the Records Retention Regulation); and the Massachusetts Department of Revenue (“DOR”) Directive 16-1 “*Recordkeeping Requirements for Sales and Use Tax Vendors Utilizing Point of Sale (POS) Systems*”

- a. Our POS system will record all transactions in a manner that will allow the DOR to verify what items were sold and confirm if the appropriate amount of tax was collected. In addition to the data in the POS system, Clear Sky Cannabis will maintain the following records:
 - i. A journal or its equivalent, which records daily all non-cash transactions affecting accounts payable;
 - ii. A cash journal or its equivalent, which records daily all cash receipts and cash disbursements, including any check transactions;
 - iii. A sales slip, invoice, cash register tape, or other document evidencing the original transaction, which substantiates each entry in the journal or cash journal;
 - iv. Memorandum accounts, records or lists concerning inventories, fixed assets or prepaid items, except in cases where the accounting system clearly records such information; and
 - v. A ledger to which totals from the journal, cash journal and other records have been periodically posted. The ledger must clearly classify the individual accounts receivable and payable and the capital account.
- b. Each POS transaction record will provide enough detail to independently determine the taxability of each sale and the amount of tax due and collected. Information on each sales transaction will include, but is not limited to the:
 - i. individual item(s) sold,
 - ii. selling price,
 - iii. tax due,
 - iv. invoice number,
 - v. date of sale,
 - vi. method of payment, and
 - vii. POS terminal number and POS transaction number.
- c. Clear Sky Cannabis will maintain auditable internal controls to ensure the accuracy and completeness of the transactions recorded in the POS system. The audit trail details include, but are not limited to:
 - i. Internal sequential transaction numbers;
 - ii. Records of all POS terminal activity; and

- iii. Procedures to account for voids, cancellations, or other discrepancies in sequential numbering.
- iv. The POS audit trail or logging functionality must be activated and operational at all times, and it must record:
- v. Any and all activity related to other operating modes available in the system, such as a training mode; and
- vi. Any and all changes in the setup of the system.

2. Types of Records

The following records will be maintained and stored by Clear Sky Cannabis and available to the Commission upon request:

- a. Operating procedures as required by 935 CMR 500.105(1)
 - i. Security measures in compliance with 935 CMR 500.110;
 - ii. Employee security policies, including personal safety and crime prevention techniques;
 - iii. A description of the Marijuana Establishment's hours of operation and after-hours contact information, which shall be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
 - iv. Storage of marijuana in compliance with 935 CMR 500.105(11);
 - v. Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold;
 - vi. Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);
 - vii. Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
 - viii. A staffing plan and staffing records in compliance with 935 CMR 500.105(9);
 - ix. Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
 - x. Alcohol, smoke, and drug-free workplace policies;
 - xi. A plan describing how confidential information will be maintained;
 - xii. A policy for the immediate dismissal of any marijuana establishment agent who has:
 - 1) Diverted marijuana, which shall be reported to law enforcement officials and to the Commission;

- 2) Engaged in unsafe practices with regard to operation of the Marijuana Establishment, which shall be reported to the Commission; or
 - 3) Been convicted or entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.
- xiii. A list of all board members and executives of a Marijuana Establishment, and members, if any, of the licensee must be made available upon request by any individual. 935 CMR This requirement may be fulfilled by placing this information on the Marijuana Establishment's website.
- xiv. Policies and procedures for the handling of cash on Marijuana Establishment premises including but not limited to storage, collection frequency, and transport to financial institution(s).
- xv. Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.
- xvi. Policies and procedures for energy efficiency and conservation that shall include:
 - 1) Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;
 - 2) Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on the site, and an explanation of why the identified opportunities were not pursued, if applicable;
 - 3) Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
 - 4) Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants.
- xvii. Policies and procedures to promote workplace safety consistent with the standards set forth under the Occupational Safety and Health Act of 1970, 29 U.S.C. § 651, et seq., including the general duty clause under 29 U.S.C. § 654, whereby:
 - Each employer (a) shall furnish to each of its employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to its employees; (b) shall comply with occupational safety and health

standards promulgated under this act. Each employee shall comply with occupational safety and health standards and all rules, regulations, and orders issued pursuant to 29 U.S.C. § 651, et seq., which are applicable to the employee's own actions and conduct.

All current and updated regulations and references at 29 CFR Parts 1903, 1904, 1910, 1915, 1917, 1918, 1926, 1928, and 1977 are incorporated by reference, and applicable to all places of employment covered by 935 CMR 500.000: Adult Use of Marijuana.

- b. Operating procedures as required by 935 CMR 500.12012)
 - i. Methods for identifying, recording, and reporting diversion, theft, or loss, and for correcting all errors and inaccuracies in inventories. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(8);
 - ii. Policies and procedures for handling voluntary and mandatory recalls of marijuana products. Such procedures shall be adequate to deal with recalls due to any action initiated at the request or order of the Commission, and any voluntary action by a Marijuana Establishment to remove defective or potentially defective marijuana products from the market, as well as any action undertaken to promote public health and safety;
 - iii. Policies and procedures for ensuring that any outdated, damaged, deteriorated, mislabeled, or contaminated marijuana products is segregated from other products and destroyed. Such procedures shall provide for written documentation of the disposition of the marijuana products. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(12);
 - iv. Policies and procedures for transportation. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(13);
 - v. Policies and procedures to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(15); and
 - vi. Policies and procedures for the transfer, acquisition, or sale of marijuana products between Marijuana Establishments.
- c. Inventory records as required by 935 CMR 500.105(8);
- d. Seed-to-sale tracking records for all marijuana products are required by 935 CMR 500.105(8)(e).
- e. Personnel records required by 935 CMR 500.105(9)(d), including but not limited to;
 - i. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;

- ii. A personnel record for each marijuana establishment agent. Such records shall be
maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and shall include, at a minimum, the following:
 - 1) All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
 - 2) Documentation of verification of references;
 - 3) The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision
 - 4) Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
 - 5) Documentation of periodic performance evaluations;
 - 6) A record of any disciplinary action taken; and
 - 7) Notice of completed Responsible Vendor Training Program and inhouse training for Marijuana Establishment Agents required under 935 CMR 500.105(2): Marijuana Establishment Agent Training.
 - iii. A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
 - iv. Personnel policies and procedures including, at a minimum, the following:
 - 1) Code of ethics;
 - 2) Whistle-blower policy; and
 - 3) 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 accommodatio; and
 - v. All background check reports obtained in accordance with 935 CMR 500.030
- f. Business records, which shall include manual or computerized records of:
- i. Assets and liabilities;
 - ii. Monetary transactions;
 - iii. Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;

- iv. Sales records including the quantity, form, and cost of marijuana products; and
- v. Salary and wages paid to each employee, stipend paid to each board member, and an executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the nonprofit corporation, if any.
- g. Waste disposal records as required under 935 CMR 500.105(12); and
- h. Following closure of a Marijuana Establishment, all records must be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission.
- i. Responsible vendor training program compliance records.
- j. Vehicle registration, inspection and insurance records. (If Applicable)

All records kept and maintained by Clear Sky Cannabis will be securely stored. Access to these records will only be granted to those Clear Sky Cannabis Agents who require access as a part of their job duties.

Personnel Policies and Background Checks

Intent

To provide clear and concise instructions for Clear Sky Cannabis employees regarding Personnel Policies that are compliant with the regulations.

Clear Sky Cannabis 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 (“CNB” or “the Commission”) or any other regulatory agency.

Purpose

The purpose of this policy is to outline the responsibilities of the company, the company’s management team and agents to ensure specific, methodical, and consistent compliance of the regulations and to ensure that our personnel policies are compliant with all relevant regulations and laws.

Personnel Records

Clear Sky Cannabis will maintain the following information in 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 Clear Sky Cannabis agent. Such records shall be maintained for at least 12 months after termination of the individual’s affiliation with Clear Sky Cannabis and shall include, at a minimum, the following:
 - a. All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
 - b. Documentation of verification of references;
 - c. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
 - d. Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
 - e. Documentation of periodic performance evaluations;
 - f. A record of any disciplinary action/performance issues; and
 - g. Notice of completed Responsible Vendor Training Program and inhouse training for Marijuana Establishment Agents required under 935 CMR 500.105(2): Marijuana Establishment Agent Training.
3. A staffing plan that will demonstrate accessible business hours

4. Personnel policies and procedures, including, at a minimum, the following:
 - a. Code of ethics;
 - b. Whistle-blower policy; and
 - c. A policy which notifies persons with disabilities of their rights under <https://www.mass.gov/service-details/about-employment-rights> or a comparable link, and includes provisions prohibiting discrimination and providing reasonable accommodations;; and
5. All background check reports obtained in accordance with M.G.L c. 6 § 172, 935 CMR 500.030: Registration of Marijuana Establishment Agents, and 803 CMR 2.00: Criminal Offender Record Information (CORI).

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 Clear Sky Cannabis 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 Clear Sky Cannabis Management agents who require access. These records will be made available for inspection by the Commission upon request.

Clear Sky Cannabis Agents

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

All Clear Sky Cannabis Agents shall:

1. Be 21 years of age or older;
2. Have not been convicted of any felony drug offense in the Commonwealth or alike violation of the laws of an Other Jurisdiction;
3. Have not been convicted of any offense involving the distribution of controlled substances to a minor or a like violation of the laws of an Other Jurisdiction; and
4. Be determined to be suitable for registration consistent with the provisions of 935 CMR 500.800, 935 CMR 500.801 or 935 CMR 500.803.

Clear Sky Cannabis will submit to the Commission an application for every Clear Sky Cannabis 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 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:
 - a. 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;
 - b. 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;
 - c. 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;
 - d. a description and relevant dates of any past discipline by, or a pending disciplinary action or unresolved complaint by, the Commonwealth, or a like action or complaint by an Other Jurisdiction, with regard to any professional license or registration held by the applicant; and
7. A nonrefundable application fee paid by the Marijuana Establishment with which the marijuana establishment agent will be associated; and
8. Any other information required by the Commission.

The Clear Sky Cannabis CEO has registered with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: iCORI 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 Clear Sky Cannabis seeks a marijuana establishment agent registration which was obtained within 30 days prior to submission.

Clear Sky Cannabis will notify the Commission no more than one business day after a Clear Sky Cannabis agent ceases to be associated with the establishment. The registration shall 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, Clear Sky Cannabis will renew each Clear Sky Cannabis Agent Registration Card on an tri-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 an Clear Sky Cannabis Agent registration card, Clear Sky Cannabis 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 carry the registration card at all times while in possession of marijuana products, including at all times while at the establishment or while transporting marijuana products.

Background Checks

Clear Sky Cannabis will comply with all Background Check requirements in the regulations and any other sub-regulatory guidance issued by the Commission.

1. **Application Process-** During the application process Clear Sky Cannabis will complete the Background Check Packet as outlined in 935 CMR 500.101(1)(b) which includes;
 - a. 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);
 - b. Information for each individual identified in 935 CMR 500.101(1)(a)1., which shall include:
 - i. The individual's full legal name and any aliases;
 - ii. The individual's address;
 - iii. The individual's date of birth;
 - iv. A photocopy of the individual's driver's license or other government-issued identification card;
 - v. 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;
 - vi. Authorization to obtain a full set of fingerprints, in accordance with M.G.L. c. 94G, § 21, submitted in a form and manner as determined by the Commission;

- c. Relevant Background Check Information. Applicants for licensure will also be required to provide information detailing involvement in any criminal or civil or administrative matters:
- i. 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;
 - ii. 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;
 - iii. 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;
 - iv. 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;
 - v. A description and relevant dates of any administrative action, including any complaint, order or disciplinary action, by the Commonwealth, or a like action by another state, the United States or foreign jurisdiction, or a military, territorial, Native American tribal authority or foreign jurisdiction, with regard to any professional license, registration, or certification, held by any board member, executive, officer, director, or member that is part of the applicant's application, if any;
 - vi. 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
 - vii. Any other information required by the Commission.

Clear Sky Cannabis 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.

2. **Background Checks not included in the Application Process-** For all Marijuana Establishment Agent Registrations not included in the application process Clear Sky Cannabis will submit Marijuana Establishment Agent applications for all required individuals. Clear Sky Cannabis will perform its own due diligence and perform background checks, including a CORI report, 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, under 935 CMR 500.802.

Equal Opportunity Employment Policy

It is the policy of Clear Sky Cannabis 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.

Clear Sky Cannabis 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, Clear Sky Cannabis will make reasonable accommodations for employees' observance of religious holidays and practices unless the accommodation would cause an undue hardship on Clear Sky Cannabis 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 Clear Sky Cannabis in seeking and evaluating alternatives.

Moreover, in compliance with the Americans with Disabilities Act (ADA), Clear Sky Cannabis provides reasonable accommodations to qualified individuals with disabilities to the fullest extent required by law. Clear Sky Cannabis may require medical certification of both the disability and the need for accommodation. Keep in mind that Clear Sky Cannabis 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. Clear Sky Cannabis 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

Clear Sky Cannabis will 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 Clear Sky Cannabis employees to perform their expected job duties will not be tolerated.

It is illegal and against Clear Sky Cannabis 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. Clear Sky Cannabis will determine whether such conduct constitutes sexual harassment, based on a review of the facts and circumstances of each situation.

Clear Sky Cannabis 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.

Clear Sky Cannabis 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 the 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

Clear Sky Cannabis 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. Clear Sky Cannabis judges 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. Clear Sky Cannabis will provide reasonable accommodations to any persons with disabilities who require them, who advise Clear Sky Cannabis of their particular needs. Information concerning individuals' disabilities and their need for accommodation will of course be handled with the utmost discretion.

Drug/Alcohol Free Workplace

Clear Sky Cannabis 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 Clear Sky Cannabis premises or while using Clear Sky Cannabis 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 Assistance Policy

To help employees in circumstances where counseling services would be helpful, Clear Sky Cannabis will make an Employee Assistance Program (EAP) counseling service available to employees, when needed, at no personal cost.

Employee Diversion of Marijuana

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

Employee Handbook

Clear Sky Cannabis will provide a comprehensive employee handbook to all employees that will outline all the information pertinent to their employment with Clear Sky Cannabis. These subjects will include, but not be limited to;

1. Clear Sky Cannabis Mission and Vision
2. Organizational Structure
3. Whistleblower Policy
4. General Employment Policies
5. Employee Categories
6. Conflicts of Interest
7. Access to Personnel Files
8. Performance Evaluations
9. Hours of Work
10. Compensation
11. Benefits
12. Code of Conduct
13. Code of Ethics
14. Discipline
15. Training

Policy for Quality Control and Testing of Marijuana and Marijuana Products SOP (Retail)

Intent

To provide clear and concise instructions for Clear Sky Cannabis' employees on Quality Control and Testing that are compliant with the regulations.

Clear Sky Cannabis 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 ("CNB" or "the Commission") or any other regulatory agency.

Superb quality control and the testing of marijuana products are essential for the operation of Clear Sky Cannabis Retail Marijuana Facility. Clear Sky Cannabis uses best industry practices when it comes to quality control and product testing, furthermore Clear Sky Cannabis will not sell any marijuana product that is a potentially hazardous food (PHF) or time/temperature control for safety food (TCS food).

General Requirements

Quality Control will be maintained through the strict adherence to Good Manufacturing Practices and compliance with 935 CMR 500.000 et. seq, 105 CMR 590.000: *Minimum Sanitation Standards for Food Establishments*, the sanitation requirement in 105 CMR 500.000: *Good Manufacturing Practices for Food*, and with the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine*.

In the case of acquiring wholesale products, Clear Sky Cannabis will only source marijuana products from Marijuana Establishments where the product has been tested in accordance with the regulations. Prior to accepting any marijuana or marijuana product from a source Marijuana Establishment Clear Sky Cannabis will view and confirm that the source products have been tested in accordance with the regulations and will store the testing records.

No marijuana product, including marijuana, may be sold or otherwise marketed for adult use that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

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 Commission, who may refer any such result to the Massachusetts Department of Agricultural Resources.

Clear Sky Cannabis will not prepare, sell or otherwise transfer an edible marijuana product with potency levels exceeding the following, as tested by an independent marijuana testing facility licensed in accordance with M.G.L. c. 94G, § 15:

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

Clear Sky Cannabis will satisfy minimum energy efficiency and equipment standards established by the Commission and meet all applicable environmental laws, regulations, permits and other applicable approvals, including those related to water quality and solid waste disposal, and to use additional best management practices as determined by the Commission in consultation with the working group established under St. 2017, c. 55, § 78(b) to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts. If minimum standards or best management practices are not established by the time of an application for initial licensure, Clear Sky Cannabis will satisfy such standards or best management practices as a condition of license renewal, in addition to any the terms and conditions of any environmental permit regulating the licensed activity.

Sanitation

Clear Sky Cannabis' Retail Marijuana facility ("the facility or facilities") will be designed and constructed with sanitation in mind.

All product contact surfaces will be smooth, durable, non-porous and easily cleanable.

1. The walls, ceiling and floors of all storage and packaging areas will be constructed of materials that are smooth, durable and can be adequately kept clean and in good repair.
 - a. There will be coving at base junctures that is compatible with both wall and floor coverings. The coving should provide at least 1/4-inch radius and 4" in height.
 - b. The Retail Manager will prepare a cleaning and sanitation checklist for the staff so that cleaning and sanitation is performed in a consistent and satisfactory manner.
2. The facility will provide sufficient space for the placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations and the sale of safe marijuana products.

3. Lighting and Light Fittings - Shatter-proof or safety-type light bulbs, fixtures, or other glass is used where lighting is suspended over retail or storage areas or otherwise protect against marijuana product contamination in case of glass breakage.
 - a. Suspended lighting is constructed from non-corrodible and cleanable assemblies.
 - b. All light bulbs used in the production, processing and storage areas are shatterproof and/or protected with plastic covers.
 - c. Adequate safety lighting in all areas.
4. Buildings, fixtures, and other physical facilities will be constructed in such a manner that allow them to be maintained in a sanitary condition
5. Product Preparation Surfaces (stainless steel tables, scale surfaces and utensils) will be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions.
 - a. Pre-scrape the surface to remove any soils.
 - b. Wash surface with recommended strength solution of pot & pan detergent.
 - c. Rinse with water and wipe dry.
 - d. Using a trigger sprayer bottle and a different wiping cloth, applying hydrogen peroxide.
 - e. Per label directions, use appropriate test papers to determine correct concentration of the sanitizer solution. Surfaces must remain wet for 60 seconds
 - f. Allow to air dry.
6. Hand-washing facilities will be adequate and convenient and shall be furnished with running water at a suitable temperature.
 - a. Located in the packaging area and where good sanitary practices require employees to wash and sanitize their hands
 - b. Provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices.
7. Each of the facilities water supply comes from the municipal water supply and is sufficient for necessary operations.

8. The facilities plumbing will be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the facility.
 - a. Plumbing shall properly convey sewage and liquid disposable waste from the facility.
 - b. There will be no cross-connections between the potable and wastewater lines;
9. The facility will provide its employees with adequate, readily accessible toilet facilities that will be maintained in a sanitary condition and in good repair.
10. All storage areas will be constructed in a manner that will protect its contents against physical, chemical, and microbial contamination as well as against deterioration of marijuana products or their containers.

Contamination Control

1. Training
 - a. All employees will be trained on pest prevention, pest management, pest detection, and pest treatments.
2. Handling and storage of marijuana product or marijuana plant waste
 - a. All marijuana plant waste will be placed in the sealed “Marijuana Waste” container.
 - i. This container must impervious and covered
 - b. All marijuana waste will be stored in the waste room in sealed containers until disposal
3. Handling and storage of non-marijuana waste.
 - a. All non-marijuana waste will be placed into the appropriate impervious covered waste receptacles
 - i. Recyclable
 - ii. Organic
 - iii. Solid waste
 - b. At the end of every day these containers will be emptied, and the contents removed from the building and placed in the appropriate secure containers to await pickup
4. All toxic materials including cleaning compounds, sanitizers, etc. will be stored

in an area away from marijuana storage areas.

Personnel

1. Any employee or contractor who, by medical examination or supervisory observation, is shown to have, or appears to have, any disease transmissible through food, an illness, open lesion, including boils, sores, or infected wounds, or any other abnormal source of microbial contamination shall be excluded from any operations which may be expected to result in contamination of the facility or others until the condition is corrected. Personnel shall be instructed to report such health conditions to their supervisors.

- a. Any manager, when he or she knows or has reason to believe that an employee has contracted any disease transmissible through food or has become a carrier of such disease, or any disease listed in 105 CMR 300.200(A) will report the same immediately by email to the Local Board of Health.
- b. Clear Sky Cannabis 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.
- c. Clear Sky Cannabis Agents must report any flu-like symptoms, diarrhea, and/or vomiting to their supervisor. Employees with these symptoms will be sent home with the exception of symptoms from a noninfectious condition.
- d. All Clear Sky Cannabis Agents shall conform to sanitary practices while on duty, including

- i. Maintain adequate personal cleanliness:

Grooming:

- i. Arrive at work clean – clean hair, teeth brushed, bathed and used deodorant daily.
- ii. Maintain short, clean, and polish-free fingernails. No artificial nails are permitted in the food/product production or processing area.
 - a. Fingernails should be trimmed, filed, and maintained so edges and surfaces are cleanable and not rough.
- iii. Wash hands (including under fingernails vigorously and thoroughly with soap and warm water for a period of at least 20 seconds:
 - When entering the facility before work begins

- In the restroom after toilet use and when you return to your work station
- After touching face, nose, hair, or any other body part, and after sneezing or coughing
- After cleaning duties
- After eating or drinking
- Any other time an unsanitary task has been performed – i.e. taking out garbage, handling cleaning chemicals, wiping tables, picking up a dropped item, etc.
- Wash hands only in hand sinks designated for that purpose.
- Dry hands with single use towels. Turn off faucets using a paper towel, in order to prevent recontamination of clean hands.

Proper Attire:

- i. Wear appropriate clothing – clean uniform with sleeves and clean non-skid close-toed work shoes (or tennis shoes) that are comfortable for standing and working on floors that can be slippery.

Cuts, Abrasions, and Burns:

- i. Bandage any cut, abrasion, or burn that has broken the skin.
- ii. Cover bandages on hands with gloves and finger cots and change as appropriate.
- iii. Inform supervisor of all wounds.

Smoking, eating, and gum chewing:

- i. Clear Sky Cannabis facility is a smoke free facility. No smoking or chewing tobacco shall occur on the premises.
- ii. Eat and drink in designated areas only.
- iii. Refrain from chewing gum or eating candy during work.

Training

Clear Sky Cannabis will provide training and training opportunities to all of its employees. In addition to required training, Clear Sky Cannabis will encourage advanced training to packaging agents in the areas of Good Manufacturing Practices and HACCP.

1. All employees will be trained on Good Manufacturing Practices (“GMP”) and Sanitation prior to or during the first day of employment.
 - a. Include basic product safety training as part of new employee orientation.
 - b. The sanitation requirements in 105 CMR 500.000: Good Manufacturing Practices for Food;
 - c. The sanitation requirements in 105 CMR 590.000: Minimum Sanitation Standards for Food Establishments; and
 - d. The requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements
2. Employees engaging in the packaging will be trained and certified in;
 - a. A nationally accredited Food Handler Program (i.e. ServSafe)
3. Provide staff with at least bi-annual training on Good Manufacturing Practices and HACCP.
4. Quarterly in-service training.
5. At least one manager will be a Certified Food Protection Managers (CFPM) by completing a ServSafe or similar nationally accredited food safety certification course.
6. Use outside resources, such as Extension specialists, vendors, health department inspectors, or qualified trainers to provide GMP, Sanitation and HACCP training.
7. Observe staff to ensure they demonstrate plant safety knowledge each day in the workplace.
8. Document the content of all training sessions and attendance.
9. File documentation in HACCP records.

Testing of Marijuana and Marijuana Products

The Clear Sky Cannabis Retail Marijuana Establishments will only have marijuana and marijuana products that have passed the required testing at a Licensed Testing Lab.

Clear Sky Cannabis will only source marijuana products from Marijuana Establishments where the product has been tested in accordance with the Regulations. Prior to accepting any marijuana or marijuana product from a source Marijuana Establishment Clear Sky Cannabis will view and confirm that the source products have been tested in accordance with the testing requirements outlined in 935 CMR 725.160 and the *“Protocol for sampling and analysis of finished medical marijuana products and marijuana-infused products for Massachusetts Registered Medical Marijuana Dispensaries”* published by DPH. These testing records will be stored and maintained pursuant to our Records Retention Policy and Procedure

We will contract with a Licensed Independent Testing Laboratory for the purposes of “Quality Control Testing.” Our quality control testing will be used to ensure that the products we are receiving from our wholesale partners are consistent with the testing records that have been reported to us. These quality control tests will help us to ensure that our products are contaminant-free and the correct dosage and potency. We plan to use CDX Analytics which is Accredited by International Organization for Standardization (ISO) 17025 by Perry Johnson Laboratory Accreditation, Inc. (PJLA), 755 W. Big Beaver, Suite 1325 Troy, Michigan 48084, a third-party accrediting body that is a signatory to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement. CDX Analytics will be Licensed by the Commission prior to Clear Sky Cannabis contracting them for testing services.

1. This testing lab will pick up and transport our testing samples to and from their lab.
2. Clear Sky Cannabis will ensure that the storage of all marijuana products at the laboratory complies with 935 CMR 500.105(11).
3. Any and all excess Clear Sky Cannabis marijuana product samples used in testing will be disposed of in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to Clear Sky Cannabis Facility for disposal or by the Independent Testing Laboratory disposing of it directly.

Clear Sky Cannabis will not sell or otherwise market for adult use that has not first been tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000: Adult Use of Marijuana. The product shall be deemed to comply with the standards required under 935 CMR 500.160: Testing of Marijuana and Marijuana Products.

1. Potency levels derived from the Cannabinoid Profile, including the amount of deltanine-tetrahydrocannabinol (Δ 9-THC) and other Cannabinoids, contained within Finished Marijuana or Marijuana Product to be sold or otherwise marketed shall be recorded in the Seed-to-sale SOR.

Required testing includes:

1. Cannabinoid Profile
2. Contaminants as specified by the Department including, but not limited to:
 - a. Mold
 - b. Mildew
 - c. Heavy metals
 - d. 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.
 - e. Bacteria
 - f. Fungi
 - g. Mycotoxins.

Clear Sky Cannabis will maintain the results of all testing for no less than one year.

If a marijuana product fails the laboratory testing, it will be quarantined and stored away from other products and the Department and the Source Marijuana establishment will be notified immediately. Clear Sky Cannabis will submit to the Department upon their request, any information regarding contamination. The entire batch of the product will be quarantined and not sold to customers. 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. Product that is confirmed to be contaminated, or if the testing results are inconsistent with the labels on the product, will be returned to the Source Marijuana Establishment.

Energy Plan

In compliance with 935 CMR 500.105(15) Clear Sky Cannabis has:

- Identified potential energy use reduction opportunities (such as natural lighting and energy efficiency measures), and implemented these opportunities to the extent possible;
- Considered opportunities for renewable energy generation including, where applicable, submission of building plans showing where energy generators could be placed on the site, and an explanation of why the identified opportunities were not pursued, if applicable;
- Reduced electric demand (such as lighting schedules, active load management, and energy storage); and
- Engaged with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants.

Clear Sky Cannabis will work closely with our local utility companies to create and execute interactive Energy Savings Plans, by means of:

- Understanding how we use energy through analysis generation;
- Compare our operation with similar businesses and act accordingly;
- Intake customized energy improvement recommendations from professionals; and
- Utilize cost incentives through utility energy performance.

Our construction administrators, superintendents, project managers, and their subcontracted team of architects, designers, and engineers will execute the retail buildout processes through pre-construction, construction, and review construction phases within preliminary planning guidelines that ensure the highest capacity of energy efficiency, both on the job and throughout the reasonable lifespan of the operation, including but not limited to:

- The purchase and installation of the highest R-Value insulation materials, that actively resist the conductive flow of heat, wherever applicable on site;
- The purchase and installation of LED lighting systems;
- The removal and disposal of outdated HVAC systems, with the purchase and installation of advanced HVAC systems and all associated ductwork.

Further practices to maintain energy efficiency throughout daily operations include:

- Using power strips to power all devices, and turning off all power strips at the conclusion of the closing process (excludes security systems);
- Using communal printers, coffee makers, microwave ovens, and refrigerators;
- Turning off monitors when leaving for more than one hour;

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- Save paper by only photocopying what is absolutely needed, and always using the second side of sheets by either printing on both sides or using the blank side as scratch paper;
 - Report any obvious energy waste or material deficiencies such as broken heaters or air leaks up the chain of command;
 - Close or tilt window blinds to block direct sunlight to reduce cooling needs during warmer months;
 - Prohibiting the use of individual space heaters;
 - Using Energy Star labeled appliances.