Massachusetts Cannabis Control Commission

Marijuana Cultivator

General Information:

License Number: MC281288

Original Issued Date: 06/21/2019

Issued Date: 07/15/2021

Expiration Date: 08/21/2022

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Mission MA, Inc.

Phone Number: 978-888-7402 **Email Address:** missionworcester@missioncan.com

Business Address 1: 640 Lincoln St. **Business Address 2:** Suite 200

Business City: Worcester **Business State:** MA **Business Zip Code:** 01605

Mailing Address 1: 640 Lincoln St. **Mailing Address 2:** Suite 200

Mailing City: Worcester **Mailing State:** MA **Mailing Zip Code:** 01605

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: yes

Priority Applicant Type: RMD Priority

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number: RP201863

RMD INFORMATION

Name of RMD: Mission MA, Inc

Department of Public Health RMD Registration Number:

Operational and Registration Status: Obtained Provisional Certificate of Registration only

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

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

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

Role: Executive / Officer **Other Role:**

First Name: Andrew **Last Name:** Thut **Suffix:**

Gender: Male **User Defined Gender:**

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

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

Entity with Direct or Indirect Authority 1

Percentage of Control: 100 **Percentage of Ownership:** 100

Entity Legal Name: Mission Partners USA, LLC **Entity DBA:** **DBA City:**

Entity Description: Parent Company

Foreign Subsidiary Narrative:

Entity Phone: **Entity Email:** **Entity Website:**

Entity Address 1: **Entity Address 2:**

Entity City: **Entity State:** **Entity Zip Code:**

Entity Mailing Address 1: **Entity Mailing Address 2:**

Entity Mailing City: **Entity Mailing State:** **Entity Mailing Zip Code:**

Relationship Description: Mission Partners USA, LLC owns and controls 100% of the voting rights of Mission MA, Inc. Mission Partners USA, LLC is a wholly-owned subsidiary of 4Front Holdings, LLC

Entity with Direct or Indirect Authority 2

Percentage of Control: **Percentage of Ownership:**

Entity Legal Name: 4Front Holdings, LLC **Entity DBA:** **DBA City:**

Entity Description: Parent Company

Foreign Subsidiary Narrative:

Entity Phone: **Entity Email:** **Entity Website:**

Entity Address 1: **Entity Address 2:**

Entity City: **Entity State:** **Entity Zip Code:**

Entity Mailing Address 1: **Entity Mailing Address 2:**

Entity Mailing City: **Entity Mailing State:** **Entity Mailing Zip Code:**

Relationship Description: Mission Partners USA, LLC is a wholly-owned subsidiary of 4Front Holdings, LLC

CLOSE ASSOCIATES AND MEMBERS

Close Associates or Member 1

First Name: Andrew **Last Name:** Thut **Suffix:**

Describe the nature of the relationship this person has with the Marijuana Establishment: CEO

Close Associates or Member 2

First Name: Josh **Last Name:** Rosen **Suffix:**

Describe the nature of the relationship this person has with the Marijuana Establishment: CEO of 4Front Holdings

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

Entity Contributing Capital 1

Entity Legal Name: Mission MA, Inc **Entity DBA:**

Email: Andrew.Thut@missioncan.com | **Phone:** 617-413-0069

Address 1: 1 State Street | **Address 2:** Suite 1250

City: Boston | **State:** MA | **Zip Code:** 02109

Types of Capital: Monetary/Equity | **Other Type of Capital:** | **Total Value of Capital Provided:** $706690.98 | **Percentage of Initial Capital:** 100

Capital Attestation: Yes

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: Andrew | **Owner Last Name:** Thut | **Owner Suffix:**

Entity Legal Name: Harborside Illinois Grown Medicine, Inc | **Entity DBA:** Mission Illinois

Entity Description: 4Front Ownership in Cannabis Dispensary

Entity Phone: 833-768-4357 | **Entity Email:** engage@missioncan.com | **Entity Website:**

Entity Address 1: 8554 S. Commercial Avenue | **Entity Address 2:**

Entity City: Chicago | **Entity State:** IL | **Entity Zip Code:** 60617 | **Entity Country:** USA

Entity Mailing Address 1: 8554 S. Commercial Avenue | **Entity Mailing Address 2:**

Entity Mailing City: Chicago | **Entity Mailing State:** IL | **Entity Mailing Zip Code:** 60617 | **Entity Mailing Country:** USA

Business Interest in Other State 2

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: Andrew | **Owner Last Name:** Thut | **Owner Suffix:**

Entity Legal Name: IL Grown Medicine, LLC | **Entity DBA:**

Entity Description: 4Front Ownership in Cannabis Cultivator

Entity Phone: 833-768-4357 | **Entity Email:** engage@missioncan.com | **Entity Website:**

Entity Address 1: 2410 Greenleaf Avenue | **Entity Address 2:**

Entity City: Elk Grove | **Entity State:** IL | **Entity Zip Code:** 60007 | **Entity Country:** USA

Entity Mailing Address 1: 2410 Greenleaf Avenue | **Entity Mailing Address 2:**

Entity Mailing City: Elk Grove | **Entity Mailing State:** IL | **Entity Mailing Zip Code:** 60007 | **Entity Mailing Country:** USA

Business Interest in Other State 3

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: 4Front Holdings, LLC | **Owner Last Name:** | **Owner Suffix:**

Entity Legal Name: OM of Medicine, LLC | **Entity DBA:** Mission Ann Arbor

Entity Description: 4Front Ownership in Cannabis Dispensary

Entity Phone: 734-369-8255 | **Entity Email:** info@omofmedicine.org | **Entity Website:**

Entity Address 1: 111 S Main Street | **Entity Address 2:** #1

Entity City: Ann Arbor | **Entity State:** MI | **Entity Zip Code:** 48104 | **Entity Country:** USA

Entity Mailing Address 1: 111 S Main Street | **Entity Mailing Address 2:** #1

Entity Mailing City: Ann Arbor **Entity Mailing State:** MI **Entity Mailing Zip Code:** 48104 **Entity Mailing Country:** USA

Business Interest in Other State 4

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: Mission Partners IP, LLC **Entity DBA:**

Entity Description: Holds trademarks, tradenames, etc.

Entity Phone: 302-658-7581 **Entity Email:** engage@missioncan.com **Entity Website:**

Entity Address 1: 1209 Orange Street **Entity Address 2:**

Entity City: Wilmington **Entity State:** DE **Entity Zip Code:** 19801 **Entity Country:** USA

Entity Mailing Address 1: 5060 N 40th St **Entity Mailing Address 2:** Suite 120

Entity Mailing City: Phoenix **Entity Mailing State:** AZ **Entity Mailing Zip Code:** 85018 **Entity Mailing Country:** USA

Business Interest in Other State 5

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: 4Front California Capital Holdings Inc **Entity DBA:**

Entity Description: 4Front ownership in Cannabis Processing Facility

Entity Phone: 602-633-3067 **Entity Email:** info@4frontventures.com **Entity Website:**

Entity Address 1: 5060 N 40th St. **Entity Address 2:** Suite 120

Entity City: Phoenix **Entity State:** AZ **Entity Zip Code:** 85018 **Entity Country:** United States

Entity Mailing Address 1: 5060 North 40th Street **Entity Mailing Address 2:** Suite 120

Entity Mailing City: Phoenix **Entity Mailing State:** AZ **Entity Mailing Zip Code:** 85018 **Entity Mailing Country:** United States

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Andrew **Last Name:** Thut **Suffix:**

Marijuana Establishment Name: Healthy Pharms **Business Type:** Marijuana Retailer

Marijuana Establishment City: Georgetown **Marijuana Establishment State:** MA

Individual 2

First Name: Andrew **Last Name:** Thut **Suffix:**

Marijuana Establishment Name: Healthy Pharms **Business Type:** Marijuana Cultivator

Marijuana Establishment City: Georgetown **Marijuana Establishment State:** MA

Individual 3

First Name: Andrew **Last Name:** Thut **Suffix:**

Marijuana Establishment Name: Healthy Pharms **Business Type:** Marijuana Product Manufacture

Marijuana Establishment City: Georgetown **Marijuana Establishment State:** MA

Individual 4

First Name: Joshua **Last Name:** Rosen **Suffix:**

Marijuana Establishment Name: Healthy Pharms **Business Type:** Marijuana Retailer

Marijuana Establishment City: Georgetown **Marijuana Establishment State:** MA

Individual 5

First Name: Joshua **Last Name:** Rosen **Suffix:**

Marijuana Establishment Name: Healthy Pharms **Business Type:** Marijuana Cultivator

Marijuana Establishment City: Georgetown **Marijuana Establishment State:** MA

Individual 6

First Name: Joshua **Last Name:** Rosen **Suffix:**

Marijuana Establishment Name: Healthy Pharms **Business Type:** Marijuana Product Manufacture

Marijuana Establishment City: Georgetown **Marijuana Establishment State:** MA

Individual 7

First Name: Andrew **Last Name:** Thut **Suffix:**

Marijuana Establishment Name: Mission MA, Inc. **Business Type:** Marijuana Retailer

Marijuana Establishment City: Brookline **Marijuana Establishment State:** MA

Individual 8

First Name: Joshua **Last Name:** Rosen **Suffix:**

Marijuana Establishment Name: Mission MA, Inc. **Business Type:** Marijuana Retailer

Marijuana Establishment City: Brookline **Marijuana Establishment State:** MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 640 Lincoln Street

Establishment Address 2: Suite 200

Establishment City: Worcester **Establishment Zip Code:** 01605

Approximate square footage of the Establishment: 18000 **How many abutters does this property have?:** 28

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

Cultivation Tier: Tier 01: up to 5,000 square feet **Cultivation Environment:** Indoor

FEE QUESTIONS

Cultivation Tier: Tier 01: up to 5,000 square feet **Cultivation Environment:** Indoor

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Community Outreach Meeting Documentation	Worcester Telegram Notice.pdf	pdf	5baa8f46e39a5e62fe05122f	09/25/2018
Community Outreach Meeting Documentation	Community Outreach Meeting Notice.pdf	pdf	5baa8fea5e45c163228417c5	09/25/2018
Community Outreach Meeting Documentation	CityClerkNotice.pdf	pdf	5bcfc3aa730d5d0462f10dd2	10/23/2018
Plan to Remain Compliant with Local Zoning	Mission MA Plan to Comply With Zoning (Worcester).pdf	pdf	5bcfc938e18f9d0d7384f12e	10/23/2018
Certification of Host Community Agreement	HCA Cert.pdf	pdf	5c391cd5dbf9ca7aade2eef6	01/11/2019

Community Outreach Meeting Documentation	WorcesterCOM_Attestation.pdf	pdf	5c4f5d82293a5312448e5e92	01/28/2019

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.: $60000

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Mission MA Positive Impact Plan.pdf	pdf	5c4f86545d4b0b1b3ebbce6a	01/28/2019

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: **Other Role:**

First Name: Andrew **Last Name:** Thut **Suffix:**

RMD Association: RMD Owner

Background Question: no

Individual Background Information 2

Role: **Other Role:**

First Name: Joshua **Last Name:** Rosen **Suffix:**

RMD Association: Not associated with an RMD

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

Entity Background Check Information 1

Role: Parent Company **Other Role:**

Entity Legal Name: Mission Partners USA, LLC **Entity DBA:**

Entity Description: Mission MA, Inc is a wholly owned subsidiary of Mission Partners USA, LLC.

Phone: 774-701-1855 **Email:** Andrew.Thut@missioncan.com

Primary Business Address 1: 5060 N 40th St. **Primary Business Address 2:** Suite 120

Primary Business City: Phoenix **Primary Business State:** AZ **Principal Business Zip Code:** 85018

Additional Information:

Entity Background Check Information 2

Role: Other (specify) **Other Role:** Member of Mission Partners

Entity Legal Name: 4Front Ventures, Inc. **Entity DBA:**

Entity Description: 4Front Ventures is the sole member of Mission Partners USA, LLC.

Phone: 774-701-1855 **Email:** info@4frontventures.com

Primary Business Address 1: 5060 N 40th St. **Primary Business Address 2:** Suite 120

Primary Business City: Phoenix **Primary Business State:** AZ **Principal Business Zip Code:**

85018

Additional Information:

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	CertificateofGoodStanding.pdf	pdf	5bcddb44f747bc02b7d23c4f	10/22/201
Articles of Organization	EntityConversion.pdf	pdf	5bcddb4c4253fa02757502da	10/22/201
Bylaws	MISSIONMABYLAWS.pdf	pdf	5bcddb531cc320027b4b39f4	10/22/201
Department of Revenue - Certificate of Good standing	MATaxCompliance.pdf	pdf	5bcddb648266760285ba7d51	10/22/201
Articles of Organization	Articles of Organization.pdf	pdf	5bcddb7cf2f9f2028f522c76	10/22/201
Articles of Organization	ArticlesofAmendmentNameChangeDPwellnesstoMissionMassachusetts.pdf	pdf	5c38ae386b68fa71e859ba7c	01/11/201

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Department of Revenue - Certificate of Good standing	MMA_Certificate of Good Standing_DOR_042721.pdf	pdf	60ccf263d50cd9085ba20d1c	06/18/2021
Secretary of Commonwealth - Certificate of Good Standing	MMA_Certificate of Good Standing_SOC_041221.pdf	pdf	60ccf2655d572808c35c28e1	06/18/2021
Department of Unemployment Assistance - Certificate of Good standing	MMA_Certificate of Good Standing_DUA_040921.pdf	pdf	60ccf266c8f270089d7f2f1a	06/18/2021

Massachusetts Business Identification Number: 001323176

Doing-Business-As Name:

DBA Registration City: Boston

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	Mission MA, Inc Business Plan.pdf	pdf	5be98f581a7752047b591182	11/12/2018
Plan for Liability Insurance	Mission MA Liablity Insurance.pdf	pdf	5be98fe82d1cf504966f2ef4	11/12/2018

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Policies and Procedures for cultivating.	Mission MA Policies and Procedures for Cultivating.pdf	pdf	5be99bb34088250d697fd135	11/12/2018
Separating recreational from medical operations, if applicable	Plan for Separating Adult Use from Medical Operations (MOP Summary).pdf	pdf	5bef28994088250d697fd69f	11/16/2018
Storage of marijuana	Mission MA Storage of Marijuana (1).pdf	pdf	5bef289ad84f77046ceed86a	11/16/2018
Transportation of marijuana	Mission MA Transportation .pdf	pdf	5bef289d1a7752047b5916a4	11/16/2018
Restricting Access to age 21 and older	PLAN FOR RESTRICTING ACCESS TO AGE 21 AND OLDER.pdf	pdf	5bef289ee18b8a04881ddbbc	11/16/2018
Record Keeping procedures	Mission MA Recordkeeping Plan.pdf	pdf	5bef28bdd912bf0445fe601d	11/16/2018
Quality control and testing	Mission MA Quality Control and Testing.pdf	pdf	5bef28be25766f0d55cc3281	11/16/2018
Qualifications and training	Mission MA Qualifications and Training.pdf	pdf	5bef28bf6427cd044e628962	11/16/2018
Prevention of diversion	Mission MA Prevention of Diversion.pdf	pdf	5bef28c0fe03b20d5f695020	11/16/2018
Maintaining of financial records	Mission MA Maintaining of Financial Records.pdf	pdf	5bef28d71a7752047b5916a8	11/16/2018
Inventory procedures	Mission MA Inventory Procedures.pdf	pdf	5bef28d9e18b8a04881ddbc0	11/16/2018
Personnel policies including background checks	Mission MA Personnel.pdf	pdf	5c3912b96f99f37acbf31af8	01/11/2019
Quality control and testing	Mission MA QC.pdf	pdf	5c3912f7a8a6bb721699c8c6	01/11/2019
Security plan	Mission MA Security Plan CPM.pdf	pdf	5c392f3101564f720c3818ac	01/11/2019
Diversity plan	MISSION MA DIVERSITY PLAN 1.24.19 edit-ML2 (1).pdf	pdf	5c4f8c0c5fd63c1b24eb206f	01/28/2019
Dispensing procedures	Dispensing Procedures.pdf	pdf	5e9890bb81ed8a355b8daf9c	04/16/2020

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

Notifcation: I Understand

COMPLIANCE WITH POSITIVE IMPACT PLAN

Progress or Success Goal 1

Description of Progress or Success: Mission MA received commence operations approval in August 2020.

1) Pay our employees a livable wage with full benefits

Mission's current starting wage is $15-16/hour and full-time employees receive full benefits including health insurance (vision, dental, and life insurance) and PTO accrual.

2) Donate at least $50,000 over five years to charitable organizations in the Worcester area whom are working to assist individuals and businesses facing systemic barriers

Since May 2020, MMA has donated $20,000 to the Worcester chapter of Habitat for Humanity

3) Hold at least 10 career training seminars over two years for individuals in areas of disproportionate impact

Due to the COVID-19 crisis in 2020, MMA did not conduct training on these topics due to the facility closing during the State of Emergency, limited staff when reopened, and the limit on gatherings. We will be hosting annual trainings on this matter starting in 2021.

4) Participate in 60 person-hours per year of charitable activities in the Worcester area

Due to the COVID-19 crisis in 2020, MMA was unable to participate in in-person charitable activities. MMA will resume charitable activities now that State of Emergency has been lifted.

COMPLIANCE WITH DIVERSITY PLAN

Diversity Progress or Success 1

Description of Progress or Success: Mission MA received commence operations approval in August 2020. Due to the COVID-19 crisis in 2020, MMA was not able to reach all of its Diversity Plan goals. However, Mission MA will continue to make progress toward its goals in 2021

Mission encourages employees from diverse groups to refer applicants for employment by placing ads in the Worcester gazette and other local publications

Mission has developed relationships with Egmont Housing Authority and plans to hold employment fairs in partnership with them.

Mission ensures job openings are sent to the Worcester Gazette and posted on websites including LinkedIn and Indeed

Mission utilizes its in-house Human Resources department to ensure that career coaching is available for all employees, including a welcome pamphlet that explains the employees opportunities upon hire.

Mission utilizes 90-day and quarterly check ins to help employees set and achieve their career goals.

Mission instructs its managers and supervisors to refer employees seeking career counseling to the Human Resources manager.

In addition, Mission uses best efforts to purchase goods and services from vendors, contractors, and professional service providers that are owned and operated by individuals that have cultural and ethnically diverse characteristics.

Mission also participates in employment and business notifications programs through its membership with the Worcester Chamber of Commerce

Mission has developed Equal Employment Opportunity (EEO) policies and internal and external communication procedures in support of the goals of the Diversity Plan

As part of its ongoing effort to meet all Diversity Plan goals, Mission reviews its Diversity Plan with management to ensure the Plan is understood.

Mission ensures that internal and external job postings are in compliance with Mission's diversity policies and procedures by instructing its recruitment team to look at zip codes to ensure they are areas of disproportionate impact.

Of 12 promotions since April 2021, 5 of the 12 were from a minority group.

HOURS OF OPERATION

Monday From: 9:00 AM	**Monday To:** 9:00 PM
Tuesday From: 9:00 AM	**Tuesday To:** 9:00 PM
Wednesday From: 9:00 AM	**Wednesday To:** 9:00 PM
Thursday From: 9:00 AM	**Thursday To:** 9:00 PM
Friday From: 9:00 AM	**Friday To:** 9:00 PM
Saturday From: 9:00 AM	**Saturday To:** 9:00 PM
Sunday From: 10:00 AM	**Sunday To:** 9:00 PM



NOTICE OF COMMUNITY OUTREACH MEETING REGARDING ADULT-USE MARIJUANA ESTABLISHMENT MISSION MASSACHUSETTS 640 LINCOLN STREET, WORCE

NOTICE OF COMMUNITY OUTREACH MEETING REGARDING ADULT-USE MARIJUANA ESTABLISHMENT MISSION MASSACHUSETTS 640 LINCOLN STREET, WORCESTER, MA Notice is hereby given that the Mission Massachusetts of 640 Lincoln St., Worcester, MA, will conduct a Community Outreach Meeting on the following matter on April 24th at Worcester Public Library, 3 Salem St., Worcester, MA, at 11 a.m. Mission Massachusetts intends to apply for the following Adult-use Marijuana Establishment licenses: Marijuana Retail (brick and mortar); Marijuana Cultivator; Marijuana Product Manufacturer at 640 Lincoln St., Worcester, MA. Community members will be permitted and are encouraged to ask questions and receive answers from representatives of Mission Massachusetts. Andrew Thut Mission Massachusetts CEO Andrew Thut Mission Massachusetts CEO

Appeared in: ***Worcester Telegram & Gazette*** on Tuesday, 04/17/2018

Printer-friendly version E-mail to a friend

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NOTICE OF COMMUNITY OUTREACH MEETING REGARDING ADULT-USE MARIJUANA ESTABLISHMENT MISSION MASSACHUSETTS, INC.
640 LINCOLN STREET, WORCESTER, MA

Notice is hereby given that the Mission Massachusetts, Inc. of 640 Lincoln St., Worcester, MA, will conduct a Community Outreach Meeting on the following matter on April 24th at Worcester Public Library, 3 Salem St., Worcester, MA, at 11 a.m. Mission Massachusetts intends to apply for the following Adult-use Marijuana Establishment licenses: Marijuana Retail (brick and mortar); Marijuana Cultivator; Marijuana Product Manufacturer at 640 Lincoln St., Worcester, MA, pursuant to M.G.L. Ch. 94G and Chapter 55 of the Acts of 2017, other applicable laws and regulations, including those issued by the Massachusetts Cannabis Control Commission.

Information presented at the community outreach hearing will include, but not be limited to:

1. The type(s) of Marijuana Establishment(s) to be located at the proposed address
2. Information adequate to demonstrate that the location will be maintained securely
3. Steps to be taken by the adult-use Marijuana Establishment to prevent diversion to minors
4. A plan by the Marijuana Establishment to positively impact the community
5. Information adequate to demonstrate that the location will not constitute a nuisance as defined by law

Community members will be permitted and are encouraged to ask questions and receive answers from representatives of Mission Massachusetts. Mission Massachusetts will also be collecting resumes and providing information for those who are interested in being employed at our Worcester location.

If you are unable to attend this event, but would like to be included on our mailing list that will provide updates about the facility, please send an email to info@missionpartners.co

A copy of this notice is on file with the City Clerk, at the City Council's office, and the Planning Board office, all located at Worcester City Hall, 455 Main St., Worcester, MA, and a copy of this Notice was mailed at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, owners of land directly opposite on any public or private street or way, and abutters to the abutters within three hundred 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.



Andrew Thut
MISSION MASSACHUSETTS CEO

Gmail by Google

Eric Casey <ericcasey@4front-advisors.com>

Notice regarding Mission Massachusetts Community Outreach Meeting

14 messages

Eric Casey <ericcasey@4front-advisors.com> Tue, Apr 17, 2018 at 9:32 AM
To: council@worcesterma.gov, planning@worcesterma.gov, health@worcesterma.gov, clerk@worcesterma.gov, CityManager@worcesterma.gov
Bcc: Andrew Thut <andrew@missionpartners.co>, Leise Rosman <leise@4front-advisors.com>, Cory Ravelson <Cory@missionpartners.co>

To Whom It May Concern,

Please see the attached notice I am submitting on behalf of Mission Massachusetts, a registered marijuana dispensary at 640 Lincoln Street that is an applicant for adult use marijuana licenses with the Cannabis Control Commission. Regulations passed by the Commission require applicants to hold a outreach meeting in the community that which they plan on operating in, and applicants must submit notice regarding the meeting to the City Clerk, Planning Board, the contracting authority for the municipality, and the local licensing authority for the adult use of marijuana.

The meeting will be conducted on April 24th at 11am at the Worcester Public Library, 3 Salem Street. Mission Massachusetts intends to apply for the following Adult-use Marijuana Establishment licenses: Marijuana Retail (brick and mortar); Marijuana Cultivator; Marijuana Product Manufacturer.

Please note that this notice does not require any offical action on behalf of the city at this time. Abutters and other nearby residents have already been sent notice of this meeting by the applicant, as is required by Cannabis Control Commission regulations. The applicant is aware of the other state and municipal approvals they must obtain before becoming operational as an adult use facility.

Please contact me with any questions.

Regards,
--

Eric Casey
Regulatory Associate

T: 774-285-1729
E: ericcasey@4frontventures.com
W: 4frontventures.com

Mission Mass Community Outreach Meeting Notice (1).pdf
29K

Clerk <Clerk@worcesterma.gov> Wed, Apr 18, 2018 at 12:06 PM
To: Eric Casey <ericcasey@4front-advisors.com>

Hello,

We have received this notice and will process it accordingly.

Mission MA, Inc. Plan to Comply with Worcester Zoning

The City of Worcester has established its own requirements regarding siting of Marijuana Establishments. The City has established a Request for Interest (RFI) to prospective Marijuana Establishment operators. Mission MA will be submitting its response to this RFI concurrently with its application with the Commission.

Worcester's Marijuana Ordinance states that shall not be construed to prevent the conversion of a medical marijuana treatment center licensed or registered no later than July 1, 2017 engaged in the cultivation, manufacture or sale of marijuana or marijuana products to a Marijuana Establishment, provided, however, any such medical marijuana treatment center obtains a special permit pursuant to this Section for any such conversion to an adult use Marijuana Establishment. Mission plans to complete the special permit and local licensing process following approval of its RFI submission to the City.

Our CEO is responsible for ensuring ongoing compliance with all municipal codes, ordinances, and bylaws and obtaining all licenses, permits, and approvals required for the operation of our facilities. We will remain in contact with local officials to keep an open line of communication.

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

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, ANDREW F. TIHUT, (*insert name*) certify as an authorized representative of MISSION MA, INC (*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 9/28/18 (*insert date*).

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 Worcester (*insert name of host community*) to certify that the applicant and Worcester (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on 9/28/18 (*insert date*).

Signature of Contracting Authority or
Authorized Representative of Host Community

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

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, Andrew Thut, (*insert name*) attest as an authorized representative of Mission MA, Inc (*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 April 24th, 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 April 17th, 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 April 17th, 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 April 14th, 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.

Initials of Attester: AT

Re: Request for Records of Costs

Andrew Borges <Andrew.Borges@4frontventures.com>
Fri 6/18/2021 2:06 PM
To: publicrecords <publicrecords@worcesterma.gov>

Hi Mike,

Just wanted to circle back with you on this. Please advise.

Andrew Borges
Northeast Project Manager
4Front Ventures
andrew.borges@4frontventures.com | 508-742-8399
4frontventures.com

From: Andrew Borges <Andrew.Borges@4frontventures.com>
Sent: Monday, September 14, 2020 4:56 PM
To: publicrecords <publicrecords@worcesterma.gov>
Subject: Re: Request for Records of Costs

Thanks Mike, I'm available at 508.742.8399 if you need to reach me.

Andrew Borges
Northeast Project Manager
p: 508.742.8399
w: www.4frontventures.com

From: publicrecords <publicrecords@worcesterma.gov>
Sent: Monday, September 14, 2020 4:46 PM
To: publicrecords <publicrecords@worcesterma.gov>; Andrew Borges <Andrew.Borges@4frontventures.com>
Subject: RE: Request for Records of Costs

Good afternoon Mr. Borges,

I know we are at the 15 business day deadline as of today. We have located the requested records but we will need a few additional days to finalize them. We will provide the records as soon as we can this week. Thank you.

Mike Vigneux
Records Access Officer
Law Department
City of Worcester | 455 Main St., Worcester MA 01608
P: 508-799-1175 x31308
VigneuxM@worcesterma.gov
www.worcesterma.gov

From: publicrecords <publicrecords@worcesterma.gov>
Sent: Monday, August 24, 2020 11:08 AM
To: Andrew.Borges@4frontventures.com
Cc: publicrecords <publicrecords@worcesterma.gov>
Subject: RE: Request for Records of Costs

Good morning Mr. Borges,

Thank you for your public records request. The City is currently in the process of gathering all responsive documents. As provided by statute, the City will take an additional 15 business days to process this request. The full 15-day time period may not be needed and responsive records will be provided as soon as they become available. The City agrees to waive any charges associated with this records request. Thank you.

Mike Vigneux
Records Access Officer
Law Department
City of Worcester | 455 Main St., Worcester MA 01608
P: 508-799-1175 x31308
VigneuxM@worcesterma.gov
www.worcesterma.gov

From: Andrew Borges <Andrew.Borges@4frontventures.com>
Sent: Friday, August 7, 2020 5:55 PM
To: DiTaranto, Susan M. <DiTarantoS@worcesterma.gov>; Williams, Michele <WilliamsMD@worcesterma.gov>
Cc: Derek Stewart <Derek.Stewart@missioncan.com>
Subject: Request for Records of Costs

Caution: This email came from outside the City of Worcester. Do not click on links or open attachments unless you are sure you recognize the sender and you know the contents are safe.

Hi Susan,

As part of Mission MA's medical license renewal application, we would like to request the records of any cost to the City of Worcester reasonably related to Mission's medical marijuana operation, including Worcester's anticipated and actual expenses resulting from Mission's operation in the community.

In accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

I am happy to discuss this request if you have any questions, please call me at 508.742.8399.

Thank you!
Andrew

Andrew Borges
Northeast Project Manager

| p: 508.742.8399

w: www.4frontventures.com

Request for Records of Costs - Attestation

Mission MA attests that no response has been received from the Host Community regarding its request for records of costs.

PLAN TO POSITIVELY IMPACT AREAS OF DISPROPORTIONATE IMPACT

Overview

Mission MA, Inc. ("Mission") is dedicated to serving and supporting the areas around it, particularly the census designated areas in Worcester and Boston (for our Brookline location) which are classified as areas of disproportionate impact in the Commission's *Guidance for Identifying Areas of Disproportionate Impact*. Marijuana businesses have an obligation to support the health and well-being of their customers as well as the communities that have had historically high rates of arrest, conviction, and incarceration related to marijuana crimes. It is Mission's intention to be a contributing, positive force in areas of disproportionate impact and to assist in changing the perception of those associated with marijuana use.

Communities for Planned Positive Impact

In compliance with the Commission's interpretation of 935 CMR 500.101(1)(a), Mission plans to positively impact the following communities:

- Past or present residents of the geographic "areas of disproportionate impact," which have been defined by the Commission and identified in its Guidance for Identifying Areas of Disproportionate Impact
- Massachusetts residents who have past drug convictions

Positive Impact Plan Goals

1. Increase the percentage of its employees who reside in an area of disproportionate impact or have lived for five of the preceding ten years in an area of disproportionate impact to at least 10% in 2 years and 20% in 5 years.
2. Hire at least one individual with a drug-related CORI (who is otherwise legally employable in a cannabis-related enterprise) per year for each of the next two years and at least 2 such individuals per year in years 3-5.

Positive Impact Plan Programs

The Dispensary Manager will administer the Plan to Positively Impact Areas of Disproportionate Impact (the "Plan"). The Dispensary Manager will be responsible for developing measurable outcomes and ensuring Mission continues to meet its commitment to provide support and make positive contributions to areas of disproportionate impact. They will explore opportunities to form philanthropic partnerships in the community to implement and enhance the Plan.

To provide continuing service and reinvestment into areas of disproportionate impact, Mission is committed to programming, restorative justice, jail diversion, workforce development, industry specific technical assistance, and mentoring services in areas of disproportionate impact.

Mission is committed to hosting and participating in events in areas of disproportionate impact of Worcester and Boston; such events will include community service days, charity events, and educational seminars. In alignment with Mission's Diversity Plan, Mission will focus hiring and education efforts on diverse populations including individuals from Black, African American, Hispanic or Latino descent and will add questions to our employment application to immediately identify and prioritize these candidates for in-person interviews.

Mission will require all executives, managers, and employees to participate quarterly in a community service day at each location. Each community service day will be organized with a charitable or local organization that serves individuals that are over the age of 21 in an area of disproportionate impact in Worcester or Boston.

Plans for specific programming include the following:

- Conducting at least two industry-specific educational/recruitment seminars annually in areas of disproportionate impact that will cover one or more of the following topics:
    - marijuana cultivation
    - marijuana product manufacturing
    - marijuana retailing, or
    - marijuana business training
- Instituting hiring practices, in alignment with Mission's Diversity Plan, that prioritize the hiring of individuals from disproportionately impacted areas of Worcester and Boston; including incorporating a questionnaire into our employment application to identify and prioritize these candidates
- Offering assistance to individuals coming from areas of disproportionate impact
- Having quarterly in-store donation drives, including direct giving and ongoing food, toiletries and clothing drives to benefit charities based near our Worcester and Brookline locations
- In order to ensure local residents are notified of openings, each time a position becomes available, Mission Massachusetts will:
    - Send a copy of the job posting and application form to the Worcester City Manager's Workforce Central Career Center for distribution to various employment and training agencies in the City's network.
    - Advertise the position(s) in the Worcester Telegram and Gazette.
    - Notify local individuals previously trained by the Commission's Social Equity Program Incubator or accelerator programs
- Mission will consult with organizations that provide job placement for individuals with drug convictions, such as Community Reentry for Women (C.R.E.W.) and the New England Center for Homeless Veterans

Measurement and Accountability

In order to ensure that Mission is both meeting its community impact goals and ascertaining that the goals are having the desired impact, the company will take the following measurement and accountability steps:

- Management will meet at least twice annually to assess community impact hiring goals
    - The assessment will also include a remediation plan to meet the goals if the company is not on track to meet them by the specified time period; or
    - If the company has met the goal early, determine if the goals need to increased
- Survey employees to ensure that community impact and diversity goals are being met and identify potential issues or areas of concern
- Review the advancement of employees from areas of disproportionate impact and those with drug convictions to ensure that they are receiving earned promotions in the company

Acknowledgments

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

The Commonwealth of Massachusetts

Secretary of the Commonwealth

State House, Boston, Massachusetts 02133

William Francis Galvin
Secretary of the
Commonwealth

Date: August 20, 2018

To Whom It May Concern :

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

MISSION MA, INC.

is a domestic corporation organized on **April 17, 2018** , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.

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

William Francis Galvin

Secretary of the Commonwealth

Certificate Number: 18080373420

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

Processed by:

D

The Commonwealth of Massachusetts

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

APR 04 2018

MA Dept. of Public Health
99 Chauncy Street
Boston, MA 02111

FORM MUST BE TYPED

Articles of Entity Conversion of a Domestic Non-Profit with a Pending Provisional or Final Certification to Dispense Medical Use Marijuana to a Domestic Business Corporation

(General Laws Chapter 156D, Section 9.53; 950 CMR 113.30)

FORM MUST BE TYPED

(1) Exact name of the non-profit: Mission Massachusetts, Inc. 001246124

(2) A corporate name that satisfies the requirements of G.L. Chapter 156D, Section 4.01:

Mission MA, Inc.

(3) The plan of entity conversion was duly approved in accordance with the law.

(4) The following information is required to be included in the articles of organization pursuant to G.L. Chapter 156D, Section 2.02(a) or permitted to be included in the articles pursuant to G.L. Chapter 156D, Section 2.02(b):

ARTICLE I

The exact name of the corporation upon conversion is:

Mission MA, Inc.

ARTICLE II

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

To engage in the cultivation, production, dispensing and sale of marijuana and marijuana products in Massachusetts, as permitted by Massachusetts law, and to engage in all activities that are related or incidental thereto and all other activities that are permitted to Domestic Business Corporations in Massachusetts.

Mission Massachusetts, Inc. is a registrant with the Department of Public Health in accordance with 105 CMR 725.100(C) as of April 4, 2018.
Bryan Harter
Director
Medical Use of Marijuana Program
Bureau of Healthcare Safety and Quality
Massachusetts Department of Public Health

6

P.C.

ARTICLE III

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

WITHOUT PAR VALUE		WITH PAR VALUE		
TYPE	NUMBER OF SHARES	TYPE	NUMBER OF SHARES	PAR VALUE
common	1000			

ARTICLE IV

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

N/A

ARTICLE V

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

N/A

ARTICLE VI

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

See attachment Pages 6A (2 pages).

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

A&S

ATTACHMENT PAGES 6A

TO

THE ARTICLES OF ENTITY CONVERSION

OF

MISSION MASSACHUSETTS, INC.

FROM

A DOMESTIC NON-PROFIT

TO

A DOMESTIC BUSINESS CORPORATION

1. Minimum Number of Directors. The Board of Directors may consist of one or more individuals, notwithstanding the number of shareholders.

2. Personal Liability of Directors to Corporation. No Director shall have personal liability to the Corporation for monetary damages for breach of his or her fiduciary duty as a Director notwithstanding any provision of law imposing such a liability, provided that this provision shall not eliminate or limit the liability of the Director (a) for any breach of the Director's duty of loyalty to the Corporation or its shareholders, (b) for acts or omissions not in good faith or which involve intentional misconduct or a knowing violation oflaw; (c) for improper distributions under Section 6.40 of Chapter 156D of the General Laws of Massachusetts, or (d) for any transaction from which the Director derived an improper personal benefit.

3. Shareholder Vote Required to Approve Matters Acted on by Shareholders. With respect to any matter as to which the affirmative vote of more than a majority of the shares in any voting group shall be required by the provisions of Chapter 156D of the General Laws of Massachusetts for the approval of the matter, the affirmative vote of a majority of all the shares in any such voting group eligible to vote on the matter shall be sufficient for the approval of the matter, notwithstanding that such greater vote on the matter would be otherwise required.

4. Shareholder Action Without a Meeting by Less Than Unanimous Consent. Action required or permitted by Chapter 156D of the General Laws of Massachusetts to be taken at a shareholders' meeting may be taken without a meeting by shareholders having not less than the minimum number of votes otherwise necessary to take the action at a meeting at which all shareholders entitled to vote on the action would be present and voting.

5. Authorization of Directors to Make, Amend or Repeal Bylaws. The Board of Directors may make, amend, and repeal the bylaws of the Corporation, in whole or in part, except with respect to any provision thereof which, by virtue of an express provision in Chapter 156D of the General

Laws of Massachusetts, these Articles of Organization or the bylaws, requires action directly and exclusively by the shareholders.

6. Authority of Directors to Create New Classes and Series of Shares. The Board of Directors, acting without the shareholders, may (a) reclassify any unissued shares of any authorized class or series into one or more existing or new classes or series, and (b) create one or more new classes or series of shares, specifying the number of shares to be included therein, the distinguishing designation thereof, and the preferences, limitations and relative rights applicable thereto, provided that the Board of Directors may not approve an aggregate number of authorized shares of all classes and series which exceeds the total number of authorized shares specified in these Articles of Organization.

7. Meetings of Shareholders. All meetings of shareholders may be held within the Commonwealth of Massachusetts or elsewhere within the United States. Such meetings may be held by telephone, webinar or other electronic means.

8. Partnership Authority. The Corporation may be a partner, general or limited, in any business enterprise which it would have the authority to conduct by itself.

9. Shareholder Examination of Corporation Records. Except as otherwise provided by law, no shareholder shall have any right to examine any property or any books, accounts or other writings of the Corporation if there is reasonable ground for belief that such examination will, for any reason, be adverse to the interests of the Corporation. A vote of the Board of Directors refusing permission to make such examination shall be prima facie evidence that such examination would be adverse to the interests of the Corporation. Every such examination shall be subject to reasonable regulations as Board of Directors may establish in regard thereto.

ARTICLE VII

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

ARTICLE VIII

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

a. The street address of the initial registered office of the corporation in the commonwealth:

b. The name of its initial registered agent at its registered office:
Incorp Services, Inc. 44 SCHOOL STREET, SUITE 325, BOSTON MA 02108-4209

c. The names and addresses of the individuals who will serve as the initial directors, president, treasurer and secretary of the corporation (an address need not be specified if the business address of the officer or director is the same as the principal office location):

President: Andrew Thut, One State St, Suite 1250, Boston MA 02109

Treasurer: Andrew Thut, One State St, Suite 1250, Boston MA 02109

Secretary: Andrew Thut, One State St, Suite 1250, Boston MA 02109

Director(s): Andrew Thut, One State St, Suite 1250, Boston MA 02109

d. The fiscal year end of the corporation:
12/31

e. A brief description of the type of business in which the corporation intends to engage:
Lawful cultivation, production, dispensing and sale of marijuana products in Massachusetts

f. The street address of the principal office of the corporation:
One State St, Suite 1250, Boston MA 02109

g. The street address where the records of the corporation required to be kept in the commonwealth are located is:

One State St, Suite 1250, Boston MA 02109 , which is
(number, street, city or town, state, zip code)

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

Signed by: _____,
(signature of authorized individual)

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

on this 3rd day of April, 2018

SECRETARY OF THE COMMONWEALTH

2018 APR 17 AM 9:04

CORPORATIONS DIVISION

COMMONWEALTH OF MASSACHUSETTS

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

Articles of Entity Conversion of a Domestic Non-Profit with a Pending Provisional or Final Certification to Dispense Medical Use Marijuana to a Domestic Business Corporation

(General Laws Chapter 156D, Section 9.53; 950 CMR 113.30)

I hereby certify that upon examination of these articles of conversion, duly submitted to me, it appears that the provisions of the General Laws relative thereto have been complied with, and I hereby approve said articles; and the filing fee in the amount of $ 475 having been paid, said articles are deemed to have been filed with me this 17 day of April, 2018, at _____ a.m./p.m.
time

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

WILLIAM FRANCIS GALVIN
Secretary of the Commonwealth

DB
Examiner

AM
Name approval

C

M

Filing fee: Minimum $250 1015

TO BE FILLED IN BY CORPORATION
Contact Information:

Leigh Ann Clifford

5060 N. 40th Street, Suite 120

Phoenix, AZ 85018

Telephone: 949-290-2453

Email: leighann@4Front-advisors.com

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

130919 1

BYLAWS
OF
MISSION MA, INC.

ARTICLE I: OFFICES

Section 1.1. REGISTERED OFFICE AND AGENT. The registered office and registered agent of the Corporation shall be as set forth in the Corporation's Articles of Organization or subsequent filing with the Secretary of the Commonwealth. The Board of Directors may at any time change the registered office or the registered agent by making the appropriate filing with the Secretary of the Commonwealth.

Section 1.2. PRINCIPAL OFFICE. The principal office of the Corporation shall be within or without the Commonwealth of Massachusetts as set forth in the Corporation's Articles of Organization or subsequent filing with the Secretary of the Commonwealth.

Section 1.3. OTHER OFFICES. The Corporation may also have other offices at any places, within or without the Commonwealth of Massachusetts, as the Board of Directors may designate, or as the business of the Corporation may require or as may be desirable.

Section 1.4. BOOKS AND RECORDS. Any records maintained by the Corporation in the regular course of its business, including its share ledger, books of account and minute books, may be maintained on any information storage device or method; provided that the records so kept can be converted into clearly legible paper form within a reasonable time. The Corporation shall convert any records so kept upon the written request of any person entitled to inspect such records pursuant to applicable law. The Corporation will retain all appropriate records and make them available for inspection by request as required by 105 CMR 725.105(I).

ARTICLE II: SHAREHOLDERS

Section 2.1. PLACE OF MEETING. Meetings of the shareholders shall be held either at the principal office of the Corporation or at any other place designated by the Board of Directors, either within or without the Commonwealth of Massachusetts, as shall be designated in the notice of the meeting or executed waiver of notice. The Board of Directors may, in its discretion, determine that the meeting may be held solely by means of remote communication as set out in Section 2.2 below.

Section 2.2. MEETINGS OF SHAREHOLDERS BY REMOTE COMMUNICATION.

If authorized by the Board of Directors, and subject to any guidelines and procedures adopted by the Board of Directors, shareholders not physically present at a meeting of shareholders may participate in a meeting of shareholders by means of remote communication, and such shareholders may be considered present in person and may vote at a meeting of shareholders, whether held at a designated place or solely by means of remote communication, subject to the conditions imposed by applicable law. The Board of Directors may, in its discretion, determine that a shareholders' meeting may be held solely by means of remote communication.

At a meeting in which shareholders can participate by means of remote communication, the Corporation shall implement reasonable measures to:

a. Verify that each person deemed present and permitted to vote at the meeting by means of remote communication is a shareholder or proxy holder;

b. Allow shareholders and proxy holders participating by remote communication to either read or hear the proceedings as they take place and to participate in the meeting and vote on matters submitted to the shareholders; and

c. Maintain a record of the vote or other action taken by shareholders at the meeting by means of remote communication.

Section 2.3. ANNUAL MEETING. An annual meeting of shareholders, for the purpose of electing directors and transacting any other business as may be brought before the meeting, shall be held on March 31, if not a legal holiday in the place where the meeting is to be held, and if a legal holiday in such place, then on the next full business day following such date/the date and time set by the Board of Directors and stated in the notice of the meeting.

Failure to hold the annual meeting at the designated time shall not affect the validity of any action taken by the Corporation. If the Board of Directors fails to call the annual meeting, any shareholder may make demand in writing to any officer of the Corporation that an annual meeting be held.

Section 2.4. SPECIAL SHAREHOLDERS' MEETINGS. Special meetings of the shareholders may be called:

a. by the Board of Directors;

OR

b. upon the demand of the holders of at least forty percent (40%) of all the votes entitled to be cast on any issue proposed to be considered at the proposed special meeting.

In order for the shareholders to demand a special meeting, the shareholders of the required percentage of shares must sign, date, and deliver to the Corporation's Secretary one or more written demands for the meeting, describing the purposes for which the meeting is to be held.

Only business within the purposes described in the Corporation's meeting notice may be conducted at a special meeting of the shareholders.

Section 2.5. FIXING THE RECORD DATE. For the purpose of determining shareholders entitled to notice of or to vote at any meeting of shareholders or any adjournment thereof, the record date shall be the date specified by the Board of Directors in the notice of the meeting. If no date is specified by the Board of Directors, the record date shall be the close of business on the day before the notice of the meeting is mailed to shareholders. If no notice is sent, the record date shall be the date set by the law applying to the type of action to be taken for which a record date must be set.

In the case of action by written consent of the shareholders without a meeting, the record date shall be (a) the date fixed by the board of directors or (b) the date that the first shareholder signs the written consent if no date has been fixed by the board.

A record date fixed under this Section may not be more than seventy (70) days before the meeting or action requiring a determination of shareholders. A determination of shareholders entitled to notice of or to vote at a shareholders' meeting is effective for any adjournment of the meeting unless the Board of Directors fixes a new record date.

Section 2.6. NOTICE OF SHAREHOLDERS' MEETING. Written or printed notice stating the place, day and hour of the meeting, the means of any remote communication by which shareholders may be considered present and may vote at the meeting, and, in case of a special meeting, the purpose or purposes for which the meeting is called, shall be given not less than seven (7) days nor more than sixty (60) days before the date of the meeting. Notice shall only be required to be made to shareholders entitled to vote at the meeting unless the purpose of the meeting is for the transaction of business for which notice to all shareholders is required by law.

Notice shall be given to a by personal delivery, by electronic transmission if consented to by a shareholder, or by mail, by or at the direction of the President, the Secretary, or the officer or person calling the meeting. If mailed, the notice shall be deemed to be given when deposited in the United States mail addressed to the shareholder at the shareholder's address as it appears on the share transfer records of the Corporation, with postage thereon prepaid.

Any person entitled to notice of a meeting may sign a written waiver of notice either before or after the time of the meeting. The participation or attendance at a meeting of a person entitled to notice constitutes waiver of notice, except where the person attends for the specific purpose of objecting to the lawfulness of the convening of the meeting.

Section 2.7. VOTING LISTS. The officer or agent having charge of the share transfer records for shares of the Corporation shall prepare an alphabetical list of all shareholders entitled to notice of the meeting, arranged by voting group and by class and series of share, with the address of and the number of shares held by each shareholder. The list shall be available for inspection by any shareholder beginning two (2) business days after notice of the meeting is given at the principal place of business of the Corporation or if the meeting will be held at another location, at a place in the city where the meeting will be held, which shall be identified in the meeting notice.

The list shall also be produced and kept open at the time and place of the meeting and shall be subject to the inspection of any shareholder during the whole time of the meeting. If any shareholders are participating in the meeting by means of remote communication, the list must be open to examination by the shareholders for the duration of the meeting on a reasonably accessible electronic network, and the information required to access the list must be provided to shareholders in the meeting notice. The Corporation shall take reasonable steps to ensure that the information is available only to shareholders of the Corporation.

Section 2.8. QUORUM OF SHAREHOLDERS. A quorum shall be present for action on any matter at a shareholder meeting if a majority of the votes entitled to be cast on the matter by a voting group is represented at the meeting in person or by proxy. A voting group includes all shares of one or more classes or series that are entitled, by law or the Articles of Organization, to vote and to be counted together collectively on a matter at a meeting of shareholders.

Once a quorum for a voting group has been established at a meeting, the shareholders in that voting group represented in person or by proxy at the meeting are deemed present for quorum purposes for the remainder of the meeting and for any adjournment unless:

a. The shareholder attends the meeting solely to object to defective notice or the conduct of the meeting on other grounds and does not vote the shares or take any other action at the meeting.

b. The meeting is adjourned and a new record date is set for the adjourned meeting.

The shareholders in a voting group represented in person or by proxy at a meeting of shareholders, even if not comprising a quorum, may adjourn the meeting as to the voting group until a time and place as may be determined by a vote of the holders of a majority of the shares of the voting group represented in person or by proxy at that meeting. If the meeting is adjourned for more than 120 days after the date fixed for the original meeting, a new record date must be fixed by the Board of Directors; notice of the meeting must be given to the shareholders who are members of the voting group as of the new record date, and a new quorum for the meeting must be established.

Section 2.9. CONDUCT OF MEETINGS. The Board of Directors of the Corporation may adopt by resolution rules and regulations for the conduct of meetings of the shareholders, as it deems appropriate. At every meeting of the shareholders, the President, or in his or her absence or inability to act, a director or officer designated by the Board of Directors, shall act as the presiding officer of the meeting. The Secretary or, in his or her absence or inability to act, the person whom the chair of the meeting shall appoint secretary of the meeting, shall act as secretary of the meeting and keep the minutes thereof.

The presiding officer shall determine the order of business and, in the absence of a rule adopted by the Board of Directors, shall establish rules for the conduct of the meeting. The presiding officer shall announce the close of the polls for each matter voted upon at the meeting, after which no ballots, proxies, votes, changes or revocations will be accepted. Polls for all matters before the meeting will be deemed to be closed upon final adjournment of the meeting.

Section 2.10. VOTING OF SHARES. Each outstanding share, regardless of class, shall be entitled to one vote on each matter submitted to a vote at a meeting of shareholders, except to the extent that the Articles of Organization provides for more or less than one vote per share or limits or denies voting rights to the holders of the shares of any class or series.

If a quorum of a voting group exists, favorable action on a matter, other than the election of Directors, will be approved by a voting group if the votes cast within the group favoring the action exceed the votes cast opposing the action, unless a greater or lesser number of votes is required by law or a greater vote is required by the Articles of Organization, these Bylaws or a resolution of the Board of Directors requiring receipt of a greater affirmative vote of the shareholders, including more separate voting groups.

Directors are elected by a plurality of the votes cast by the shares entitled to vote in the election at a meeting at which a quorum is present.

No ballot shall be required for the election of directors unless requested by a shareholder present or represented at the meeting and entitled to vote in the election.

Section 2.11. VOTING BY PROXY OR NOMINEE. Shares of the Corporation's stock owned by the Corporation itself or by another corporation or entity, the majority of the voting stock or interest of which is owned or controlled by the Corporation, shall not be voted, directly or indirectly, at any meeting, and shall not be counted in determining the total number of outstanding shares at any given time. Nothing in this section shall be construed as limiting the right of the Corporation or any domestic or foreign corporation or other entity to vote shares, held or controlled by it in a fiduciary capacity, or with respect to which it otherwise exercises voting power in a fiduciary capacity.

A shareholder may vote either in person or by proxy executed in writing by the shareholder or his or her attorney-in-fact. An appointment of a proxy is effective when received by the Secretary or other officer or agent authorized by the Corporation to tabulate votes. No proxy shall be valid after eleven (11) months from the date of its execution unless otherwise provided in the proxy. A proxy shall be revocable unless the proxy form conspicuously states that the proxy is irrevocable and the proxy is coupled with an interest as defined in the Massachusetts Business Corporations Act. An appointment made irrevocable is revoked when the interest with which it is coupled is extinguished. The death or incapacity of the shareholder appointing a proxy shall not affect the right of the Corporation to accept the proxy's authority unless notice of the death or incapacity is received by the Secretary or other officer or agent authorized to tabulate votes before the proxy exercises his or her authority under the appointment.

Shares owned by another corporation, domestic or foreign, may be voted by any officer, agent, or proxy as the bylaws of that corporation may authorize or, in the absence of authorization, as the Board of Directors of that corporation may determine.

An administrator, executor, guardian, or conservator may vote shares held in that fiduciary capacity if the shares forming a part of an estate are in the possession and forming a part of the estate being served by the fiduciary, either in person or by proxy, without a transfer of the shares into the fiduciary's name. A trustee may vote shares standing held in trustee's name, either in person or by proxy, but no trustee shall be entitled to vote shares held by him or her without a transfer of the shares into his or her name as trustee.

A receiver may vote shares standing in the name of a receiver and may vote shares held by or under the control of a receiver without the transfer thereof into the receiver's name if authority so to do be contained in an appropriate order of the court by which the receiver was appointed.

A shareholder whose shares are pledged shall be entitled to vote the shares until the shares have been transferred into the name of the pledgee, and thereafter the pledgee shall be entitled to vote the shares transferred, subject to any agreements containing restrictions on the hypothecation, assignment, pledge, or voluntary or involuntary transfer of shares.

The Board of Directors may establish a procedure by which the beneficial owner of shares that are registered in the name of a nominee may be recognized by the Corporation as the shareholder to the extent provided by the procedure. The procedure may set forth the types of nominees to which it applies, the rights or privileges that the Corporation recognizes in a beneficial owner, the manner in which the procedure is selected by the nominee, a requirement for the certification by the nominee of the beneficial owner, the information to be provided when the procedure is selected, the period for which selection of the procedure is effective, and other aspects of the rights and duties created.

Section 2.12. WRITTEN CONSENT OF SHAREHOLDERS WITHOUT A MEETING. Any action required or permitted to be taken at any annual or special meeting of shareholders may be taken without a meeting, if a consent or consents in writing, setting forth the action so taken, shall have been signed by the holder or holders of all the shares entitled to vote with respect to the action that is the subject of the consent or by shareholders not having less than the minimum number of votes necessary to take the action at a meeting at which all shareholders entitled to vote on the action are present and voting. The action shall be evidenced by one or more written consents that describe the action taken, are signed by shareholders having the requisite votes, bear the date of the signatures of such shareholders, and are delivered to the

Corporation for inclusion with the records of meetings within sixty (60) days of the earliest dated consent delivered to the Corporation.

If the action to be taken pursuant to the consent of voting shareholders without a meeting is one for which notice to all shareholders would be required by law if the action were to be taken at a meeting, then the Corporation shall give notice, in the manner specified by Section 2.6, at least seven (7) days before the action is taken, to all nonvoting shareholders.

ARTICLE III: DIRECTORS

Section 3.1. POWERS. All corporate power shall be exercised by or under the authority of, and the business and affairs of the Corporation shall be managed under the direction of, the Board of Directors, except such powers expressly conferred upon or reserved to the shareholders, and subject to any limitations set forth by law, by the Articles of Organization or by these Bylaws.

Section 3.2. NUMBER OF DIRECTORS. The Board of Directors shall consist of at least one (1) but no more than seven (7) directors with the number fixed from time to time by resolution adopted by the Board of Directors or the shareholders. No decrease in the number of directors shall have the effect of decreasing the number of directors below the minimum number of individuals permitted by law, nor shall have the effect of shortening the term of any incumbent director.

Section 3.3. TERM OF OFFICE. At the first annual meeting of shareholders and at each annual meeting thereafter, the holders of shares entitled to vote in the election of directors shall elect directors to hold office until the next succeeding annual meeting. Despite the expiration of a director's term, he or she shall continue to serve until his or her successor is elected and qualified or until there is a decrease in the number of directors.

Section 3.4. VACANCIES. Vacancies and newly created directorships, whether resulting from an increase in the size of the board of directors, from the death, resignation, disqualification or removal of a director or otherwise, may be filled by election at an annual or special meeting of shareholders called for that purpose or by the affirmative vote of a majority of the remaining directors then in office, even though less than a quorum of the Board of Directors. A director elected to fill a vacancy shall be elected for the unexpired term of his or her predecessor in office. All appointed directors must complete the appropriate background checks as required by the Massachusetts Department of Health, and the Department must be notified regarding any changes to the Board.

Section 3.5. REMOVAL. Directors may be removed from office at any time with or without cause by the shareholders entitled to elect them. A director may be removed by shareholders or directors only at a meeting called for that purpose, for which the notice must state that the purpose, or one of the purposes, of the meeting is removal of the director or directors.

Section 3.6. RESIGNATION. A director may resign by providing notice in writing to the Corporation. The resignation shall be effective upon the later of the date of receipt of the notice of resignation or the effective date specified in the notice. Acceptance of the resignation shall not be required to make the resignation effective.

Section 3.7. MEETINGS OF DIRECTORS. A regular meeting of the newly-elected Board of Directors shall be held without other notice immediately following each annual meeting of shareholders, at which the board shall elect officers and transact any other business as shall come

before the meeting. The board may designate a time and place for additional regular meetings, within or outside Massachusetts, by resolution, without notice other than the resolution.

Special meetings of the Board of Directors may be called by the President, by the Chairman of the Board, if any, by the Secretary, by any two directors, or by one director in the event that there is only one director.

Section 3.8. PARTICIPATION BY REMOTE COMMUNICATION. The Board of Directors may permit any or all directors to participate in any meeting by, or conduct the meeting through the use of, any means of communication by which all directors participating may simultaneously hear each other during the meeting. A director participating in a meeting by this means is considered to be present in person at the meeting.

Section 3.9. NOTICE OF DIRECTORS' MEETINGS. All special meetings of the Board of Directors shall be held upon not less than two (2) days' notice stating the purpose, date, place and time of the meeting given to each director.

Notice may be given to each personally, by telephone or voice mail, by mail, by electronic transmission if consented to by the director, or by messenger or delivery service. Notice to each director shall also be given by electronic transmission at the director's last known e-mail address.

A written waiver of the required notice signed by a director entitled to the notice, before or after the meeting, is the equivalent of giving notice to the director who signs the waiver. A director's attendance at any meeting shall constitute a waiver of notice of the meeting, except where the director attends a meeting for the express purpose of objecting to the transaction of any business on the grounds that the meeting is not lawfully called or convened.

Section 3.10. QUORUM AND ACTION OF DIRECTORS. A majority of the number of directors shall constitute a quorum for the transaction of business. The act of the majority of the directors present at a meeting at which a quorum is present at the time of the act shall be the act of the Board of Directors, unless the act of a greater number is required by law, the Articles of Organization, or these Bylaws. The directors at a meeting for which a quorum is not present may adjourn the meeting until a time and place as may be determined by a vote of the directors present at that meeting.

Section 3.11. COMPENSATION. Directors shall not receive any stated salary for their services, but by resolution of the Board of Directors a fixed sum and expenses of attendance, if any, may be allowed for attendance at any meeting of the Board of Directors or committee thereof. A director shall not be precluded from serving the Corporation in any other capacity and receiving compensation for services in that capacity.

Section 3.12. ACTION BY DIRECTORS WITHOUT A MEETING. Any action required or permitted to be taken at a meeting of the Board of Directors or any committee thereof may be taken without a meeting if all members of the Board of Directors or committee consent in writing or by electronic transmission and the writings or electronic transmissions are filed with the minutes of the proceedings of the Board of Directors.

Section 3.13. COMMITTEES OF THE BOARD OF DIRECTORS. The Board of Directors, by resolution adopted by a majority, may designate one or more directors to constitute one or more committees, to exercise the authority of the Board of Directors to the extent provided in the resolution of the Board of Directors and allowed under the law of the Commonwealth.

A committee of the Board of Directors does not have the authority to:

a. Authorize distributions;

b. Approve or propose to shareholders action that this chapter requires be approved by shareholders, including an amendment to the Articles of Organization;

c. Change the number of the Board of Directors, remove directors from office or fill vacancies on the Board of Directors, or

d. Adopt, amend, or repeal the Bylaws of the Corporation.

The designation of a committee of the Board of Directors and the delegation thereto of authority shall not operate to relieve the Board of Directors, or any member thereof, of any responsibility imposed by law.

ARTICLE IV: OFFICERS

Section 4.1. POSITIONS AND APPOINTMENT. The officers of the Corporation shall be appointed by the Board of Directors and shall be a President, a Treasurer, a Secretary, and any other officers, including assistant officers and agents, as may be deemed necessary by the Board of Directors. Any two or more offices may be held by the same person.

Each officer shall serve until a successor is appointed and qualified, or until the death, resignation, or removal of that officer. Vacancies or new offices shall be filled at the next regular or special meeting of the Board of Directors. Appointment of an officer or agent shall not of itself create contract rights.

Section 4.2. REMOVAL. Any officer appointed or elected by the Board of Directors may be removed with or without cause by the affirmative vote of the majority of the Board of Directors at any regular or special meeting. Removal shall be without prejudice to the contract rights, if any, of the officer so removed.

Section 4.3. PRESIDENT. The President shall be the chief executive officer of the Corporation, and subject to the direction of the Board of Directors, shall have active, general supervision and executive management over the business and affairs of the Corporation. The President shall preside at all meetings of all directors, shall see that all orders and resolutions of the Board of Directors are carried out, and shall perform any other duties as the Board of Directors may assign.

Section 4.4. VICE-PRESIDENTS. Each Vice President, in order of their rank as designated by the Board of Directors, shall perform the duties and exercise the powers of the President in the absence or disability of the President, and shall perform other duties as the Board of Directors or President shall assign.

Section 4.5. THE SECRETARY AND ASSISTANT SECRETARIES. The Secretary shall attend all meetings of the Board of Directors and all meetings of the shareholders and shall record all votes and the minutes of all proceedings and shall perform like duties for the standing committees when required. The Secretary shall give or cause to be given notice of all meetings of the shareholders and all meetings of the Board of Directors and shall perform other duties as may be prescribed by the Board of Directors or the President. The Secretary shall be the custodian of the records and of the seal of the Corporation, and shall affix the seal to all documents and attest to it, when duly authorized by the Board of Directors.

The Assistant Secretaries shall, in order of their rank as designated by the Board of Directors, in the absence or disability of the Secretary, perform the duties and exercise the powers of the Secretary, and they shall perform other duties as the Board of Directors or the Secretary shall assign.

In the absence of the Secretary or an Assistant Secretary, the minutes of all meetings of the board and shareholders shall be recorded by the person designated by the President or by the Board of Directors.

Section 4.6. THE TREASURER AND ASSISTANT TREASURERS. The Treasurer shall be the principal financial officer of the Corporation, shall have the custody of the corporate funds and securities, shall keep full and accurate accounts of receipts and disbursements of the Corporation, shall deposit all moneys and other valuable effects in the name and to the credit of the Corporation in the depositories designated by the Board of Directors, and in general shall perform all the duties incident to the office of Treasurer and such other duties as from time to time may be assigned by the Board of Directors or by the President.

The Treasurer shall disburse the funds of the Corporation as may be ordered by the Board of Directors, taking proper vouchers for the disbursements. The Treasurer shall keep and maintain the Corporation's books of account and shall render to the President and the Board of Directors an account of all of his or her transactions as Treasurer and of the financial condition of the Corporation and exhibit the books, records and accounts to the President or the Board of Directors at any time.

If required by the Board of Directors, the Treasurer shall give the Corporation a bond in a sum and with a surety or sureties satisfactory to the Board of Directors for the faithful performance of the duties of the office and for the restoration to the Corporation, in case of death, resignation, retirement or removal from office, of all books, papers, vouchers, money and other property of whatever kind in the incumbent's possession or under the incumbent's control belonging to the Corporation.

The Assistant Treasurers in the order of their seniority shall, in the absence or disability of the Treasurer, perform the duties and exercise the powers of the Treasurer, and they shall perform other duties as the Board of Directors shall prescribe.

ARTICLE V: INDEMNIFICATION OF DIRECTORS AND OFFICERS

The Corporation shall indemnify a director or officer who was wholly successful, on the merits or otherwise, in the defense of any proceeding to which he or she was a party because he or she was a director or officer of the Corporation against reasonable expenses incurred by him or her in connection with the proceeding.

The Corporation may, to the fullest extent permitted by law, indemnify each person who may serve or who has served at any time as a director or officer of the Corporation or of any of its subsidiaries, or who at the request of the Corporation may serve or at any time has served as a director, officer, administrator or trustee of, or in a similar capacity with, another organization or any employee benefit plan, against all expenses and liabilities, including counsel fees, reasonably incurred by or imposed upon such person in connection with any proceeding in which he may become involved by reason of his serving or having served in such capacity.

The indemnification provided hereunder shall inure to the benefit of the heirs, executors and administrators of a director, officer or other person entitled to indemnification hereunder.

The foregoing right of indemnification shall be in addition to and not exclusive of any other rights which such director or officer or other person may be entitled under the Articles of Organization, any agreement, or pursuant to any action taken by the directors or shareholders of the Corporation or otherwise.

ARTICLE VI: SHARE CERTIFICATES AND TRANSFER

Section 6.1. CERTIFICATES REPRESENTING SHARES. If shares are represented by certificates, at a minimum each share certificate shall state upon the face thereof:

a. The name of the Corporation and that it is organized under the laws of the Commonwealth.

b. The name of the person to whom issued.

c. The number and class of shares and the designation of the series, if any, which the certificate represents.

The Corporation shall, after the issuance or transfer of uncertificated shares, send to the registered owner of uncertificated shares a written notice containing the information required to be set forth or stated on certificates pursuant to the Massachusetts Business Corporations Act. Except as otherwise expressly provided by law, the rights and obligations of the holders of uncertificated shares and the rights and obligations of the holders of certificates representing shares of the same class and series shall be identical.

No share shall be issued until the consideration therefor, fixed as provided by law, has been fully paid.

Section 6.2. TRANSFERS OF SHARES. Shares of the Corporation shall be transferable in the manner prescribed by law and in these Bylaws. Transfers of shares shall be made on the books of the Corporation only by the holder of record thereof, by such person's attorney lawfully constituted in writing and, in the case of certificated shares, upon the surrender of the certificate thereof, which shall be cancelled before a new certificate or uncertificated shares shall be issued. No transfer of shares shall be valid as against the Corporation for any purpose until it shall have been entered in the share records of the Corporation by an entry showing from and to whom transferred.

Section 6.3. REGISTERED SHAREHOLDERS. The Corporation may treat the holder of record of any shares issued by the Corporation as the holder in fact thereof, for purposes of voting those shares, receiving distributions thereon or notices in respect thereof, transferring those shares, exercising rights of dissent with respect to those shares, exercising or waiving any preemptive right with respect to those shares, entering into agreements with respect to those shares in accordance with the laws of the Commonwealth, or giving proxies with respect to those shares.

Section 6.4. LOST CERTIFICATES. The Board of Directors may direct a new certificate or certificates to be issued in place of any certificate or certificates theretofore issued by the Corporation alleged to have been lost or destroyed, upon the making of an affidavit of that fact by the person claiming the certificate to be lost. When authorizing the issue of a new certificate

or certificates, the Board of Directors in its discretion and as a condition precedent to the issuance thereof, may require the owner of the lost or destroyed certificate or certificates or his or her legal representative to give the Corporation a bond with surety in a sum as it may direct as indemnity against any claim that may be made against the Corporation or other obligees with respect to the certificate alleged to have been lost or destroyed.

ARTICLE VII: MISCELLANEOUS

Section 7.1. SEAL. The Corporation may adopt a corporate seal in a form approved by the Board of Directors. The Corporation shall not be required to use the corporate seal and the lack of the corporate seal shall not affect an otherwise valid contract or other instrument executed by the Corporation.

Section 7.2. CHECKS, DRAFTS, ETC. All checks, drafts or other instruments for payment of money or notes of the Corporation shall be signed by an officer or officers or any other person or persons as shall be determined from time to time by resolution of the Board of Directors.

Section 7.3. FISCAL YEAR. The fiscal year of the Corporation shall be as determined by the Board of Directors.

Section 7.4. INVALID PROVISIONS. If any one or more of the provisions of these Bylaws, or the applicability of any provision to a specific situation, shall be held invalid or unenforceable, the provision shall be modified to the minimum extent necessary to make it or its application valid and enforceable, and the validity and enforceability of all other provisions of these Bylaws and all other applications of any provision shall not be affected thereby.

ARTICLE VIII: AMENDMENT OF BYLAWS

The power to make, amend, or repeal these Bylaws shall be in the shareholders.

The directors also may make, amend, or repeal these Bylaws in whole or in part, except with respect to any provision that by virtue of the law, the Articles of Organization or these Bylaws requires action by the shareholders.

Commonwealth of Massachusetts
Department of Revenue
Christopher C. Harding, Commissioner

mass.gov/dor

Letter ID: L1890099840
Notice Date: August 21, 2018
Case ID: 0-000-583-559

CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE

MISSION MA, INC.
369 ELM ST
CONCORD MA 01742-2250

000015

Why did I receive this notice?

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

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

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

What if I have questions?

If you have questions, call us at (617) 887-6367 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 8:30 a.m. to 4:30 p.m..

Visit us online!

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

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

Edward W. Coyle, Jr., Chief
Collections Bureau

The Commonwealth of Massachusetts
William Francis Galvin

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

Minimum Fee: $35.00

Special Filing Instructions

Articles of Organization
(General Laws, Chapter 180)

Identification Number: 001171432

ARTICLE I

The exact name of the corporation is:

DP MASSACHUSETTS WELLNESS, INC.

ARTICLE II

The purpose of the corporation is to engage in the following business activities:

TO ENGAGE IN ANY OR ALL LAWFUL ACTS OR ACTIVITIES FOR WHICH NON-PROFIT CORPORATIONS MAY BE ORGANIZED UNDER THE GENERAL NON-PROFIT CORPORATION LAWS OF MASSACHUSETTS, AND PERMITTED UNDER GENERAL LAWS OF MASSACHUSETTS, PART I, TITLE XXII, CHAPTER 180

ARTICLE III

A corporation may have one or more classes of members. If it does, the designation of such classes, the manner of election or appointments, the duration of membership and the qualifications and rights, including voting rights, of the members of each class, may be set forth in the by-laws of the corporation or may be set forth below:

ARTICLE IV

Other lawful provisions, if any, for the conduct and regulation of the business and affairs of the corporation, for its voluntary dissolution, or for limiting, defining, or regulating the powers of the corporation, or of its directors or members, or of any class of members, are as follows:
(If there are no provisions state "NONE")

Notes: The preceding four (4) atricles are considered to be permanent and may only be changed by filing appropriate Articles of Amendment.

ARTICLE V

The by-laws of the corporation have been duly adopted and the initial directors, president, treasurer and clerk or other presiding, financial or recording officers, whose names are set out on the following page, have been duly elected.

ARTICLE VI

The effective date of organization of the corporation shall be the date approved and filed by the Secretary of the Commonwealth. If a *later* effective date is desired, specify such date which shall not be more than *thirty days* after the date of filing.

ARTICLE VII

The information contained in Article VII is not a permanent part of the Articles of Organization.

a. The street address *(post office boxes are not acceptable)* of the principal office of the corporation *in Massachusetts* is:

No. and Street: 369 ELM STREET
City or Town: CONCORD State: MA Zip: 01742 Country: USA

b. The name, residential street address and post office address of each director and officer of the corporation is as follows:

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code	Expiration of Term
PRESIDENT	ANDREW THUT	369 ELM STREET CONCORD, MA 01742 USA 369 ELM STREET CONCORD, MA 01742 USA	04/30/2016
TREASURER	KRISTOPHER KRANE	219 KITTREDGE ST ROSLINDALE, MA 02131 USA 219 KITTREDGE ST ROSLINDALE, MA 02131 USA	04/30/2016
SECRETARY	KRISTOPHER KRANE	219 KITTREDGE ST ROSLINDALE, MA 02131 USA 219 KITTREDGE ST ROSLINDALE, MA 02131 USA	04/30/2016
DIRECTOR	KRISTOPHER KRANE	219 KITTREDGE ST ROSLINDALE, MA 02131 USA 219 KITTREDGE ST ROSLINDALE, MA 02131 USA	04/30/2016
DIRECTOR	ANDREW THUT	369 ELM STREET CONCORD, MA 01742 USA 369 ELM STREET CONCORD, MA 01742 USA	04/30/2016

c. The fiscal year (i.e., tax year) of the business entity shall end on the last day of the month of:
December

d. The name and business address of the resident agent, if any, of the business entity is:

Name: INCORP SERVICES, INC.
No. and Street: 10 MILK STREET, SUITE 105
City or Town: BOSTON State: MA Zip: 02108-4600 Country: USA

I/We, the below signed incorporator(s), do hereby certify under the pains and penalties of perjury that I/we have not been convicted of any crimes relating to alcohol or gaming within the past ten years. I/We do hereby further certify that to the best of my/our knowledge the above-named officers have not been similarly convicted. If so convicted, explain:

IN WITNESS WHEREOF AND UNDER THE PAINS AND PENALTIES OF PERJURY, I/we, whose signature(s) appear below as incorporator(s) and whose name(s) and business or residential address (es) beneath each signature do hereby associate with the intention of forming this business entity under the provisions of General Law, Chapter 180 and do hereby sign these Articles of Organization as incorporator(s) this 4 Day of May, 2015. *(If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of*

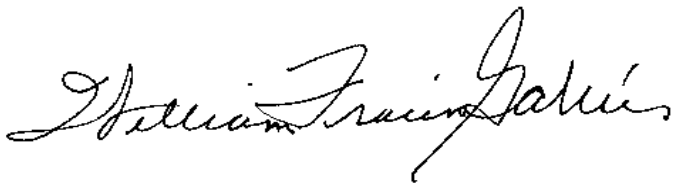
the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.)
ANDREW THUT

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All Rights Reserved

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:

May 04, 2015 02:10 PM



WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: $15.00

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

Articles of Amendment
(General Laws, Chapter 180, Section 7)

Identification Number: 001171432

We, ANDREW THUT **X President** __ **Vice President,**

and KRISTOPHER KRANE **X Clerk** __ **Assistant Clerk** ,

of DP MASSACHUSETTS WELLNESS, INC.
located at: 369 ELM STREET CONCORD , MA 01742 USA

do hereby certify that these Articles of Amendment affecting articles numbered:

X Article 1 __ Article 2 __ Article 3 __ Article 4

(Select those articles 1, 2, 3, and/or 4 that are being amended)

of the Articles of Organization were duly adopted at a meeting held on 6/1/2015 , by vote of: 0 members, 2 directors, or 0 shareholders,
being at least two-thirds of its members/directors legally qualified to vote in meetings of the corporation (or, in the case of a corporation having capital stock, by the holders of at least two thirds of the capital stock having the right to vote therein):

ARTICLE I

The exact name of the corporation, ***as amended***, is:
(Do not state Article I if it has not been amended.)

MISSION MASSACHUSETTS, INC.

ARTICLE II

The purpose of the corporation, ***as amended***, is to engage in the following business activities:
(Do not state Article II if it has not been amended.)

ARTICLE III

A corporation may have one or more classes of members. ***As amended,*** the designation of such classes, the manner of election or appointments, the duration of membership and the qualifications and rights, including voting rights, of the members of each class, may be set forth in the by-laws of the corporation or may be set forth below:

ARTICLE IV

As amended, other lawful provisions, if any, for the conduct and regulation of the business and affairs of the corporation, for its voluntary dissolution, or for limiting, defining, or regulating the powers of the business entity, or of its

directors or members, or of any class of members, are as follows:
(If there are no provisions state "NONE")

The foregoing amendment(s) will become effective when these Articles of Amendment are filed in accordance with General Laws, Chapter 180, Section 7 unless these articles specify, in accordance with the vote adopting the amendment, a *later* effective date not more than *thirty days* after such filing, in which event the amendment will become effective on such later date.

Later Effective Date:

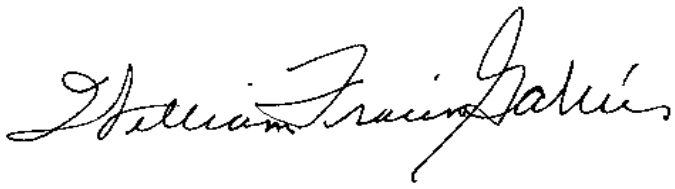
Signed under the penalties of perjury, this 3 Day of June, 2015, ANDREW THUT , its , President / Vice President,
KRISTOPHER KRANE , Clerk / Assistant Clerk.

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THE COMMONWEALTH OF MASSACHUSETTS

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

June 03, 2015 05:36 PM



WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

MISSION MA, Inc.

Business Plan

About Us

Co-founded by Kris Krane and Josh Rosen in 2011, 4Front provides license procurement, compliance and operations services to cannabis dispensary operators and cultivators. 4Front provides unparalleled support and access to the best practices and people within the rapidly evolving marijuana industry. 4Front is committed to providing advanced levels of professionalism and integrity, working only with those who wish to operate a best-in-class marijuana organization.

4Front has developed the most comprehensive set of operating policies and procedures available by leveraging the best practices of leading medical marijuana facility operators. 4Front has invested heavily in its support capabilities to ensure clients are operating most efficiently, while maintaining compliance with local regulations. These solutions have been developed by tailoring principles followed by some of the country's most successful retail chains to the marijuana industry.

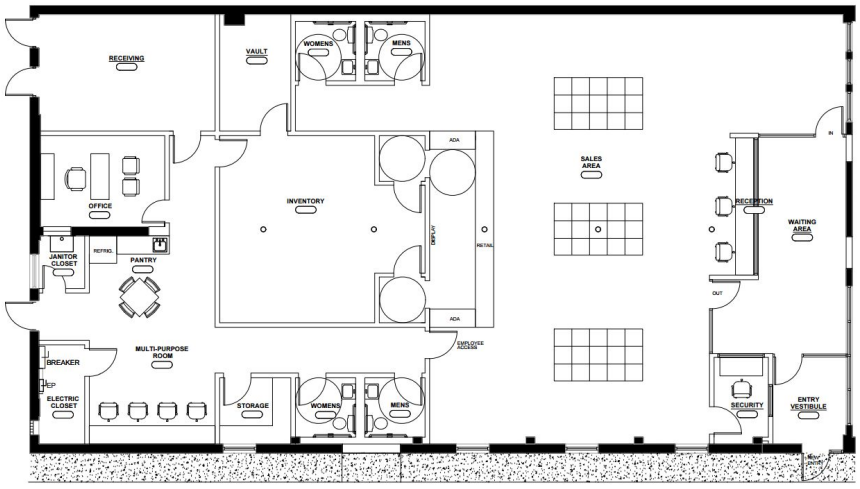
The talents of the 4Front team demonstrate a breadth of industry and professional experience. The team is intentionally multifaceted with expertise in regulatory compliance, legislative policy development, retail and business operations, project management, and management training. We have been intimately involved in the day-to-day operations of two of the nation's premier medical marijuana dispensaries. The 4Front staff's operational knowledge is the key to ensuring that partners are provided with the best resources available.

Our Operations

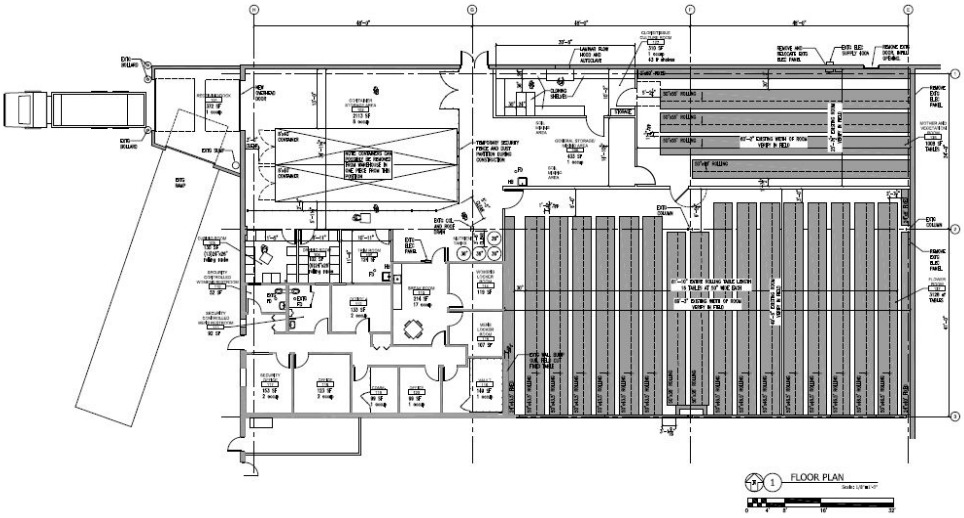
In 2015, partners in 4Front, a leading consulting, management and investment firm in the medical cannabis industry, made the strategic business decision to launch **Mission Partners**, a patient-focused medical marijuana company. While the company still supports partners in an advisory capacity, we are compelled to leverage our industry expertise and resources to bring best-in-class medical marijuana operations to markets around the country.

Mission Illinois

Mission Illinois' dispensary is located at 8554 S. Commercial Ave. in Chicago. This 4,200-square-foot storefront opened in 2017, and serves around 100 patients per week. The dispensary is located on the southside of Chicago, and serves as a model for using the cannabis industry to provide access to high quality medicine, as well as opportunities for employment and economic advancement, to communities that have been both underserved by the industry to date and disproportionately impacted by cannabis prohibition.



We also developed a major cultivation facility in Elk Grove Village, IL. Situated in a 96,000-square-foot warehouse, this indoor grow will gradually expand to 45,200 square feet—our largest project to date. At full capacity, the Elk Grove facility is expected to be capable of producing more than 9,000 pounds of cannabis flower annually.



Mission Pennsylvania

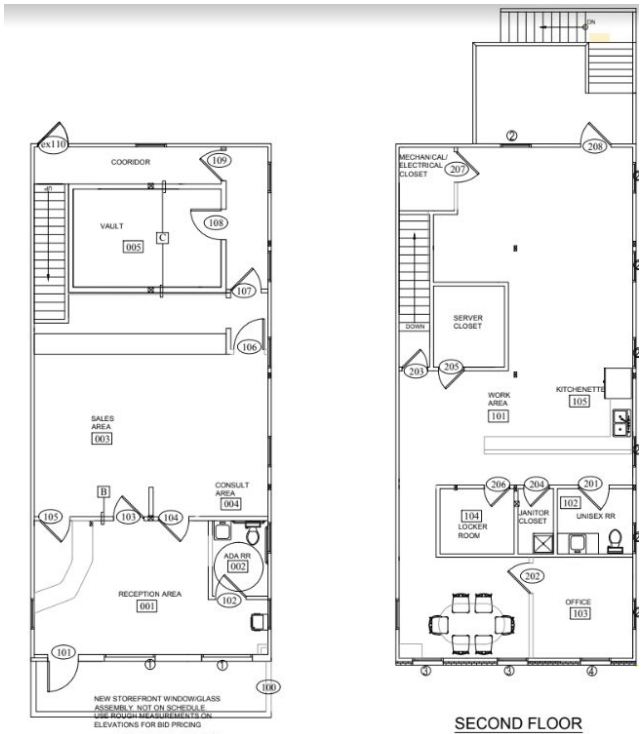
Mission Pennsylvania's retail medical marijuana facility is located in Allentown, Pennsylvania and has been in operation since June 2018. This 2,900 square foot facility serves 900 patients monthly and has already shown growth as Pennsylvania's medical marijuana program continues to mature and develop. Mission expects to open two additional locations in 2019.



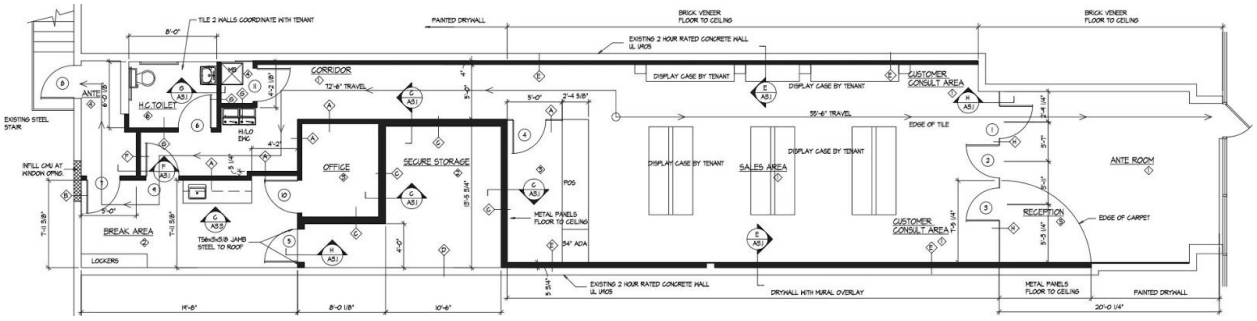
Mission Maryland

Mission is also currently licensed to operate one medical cannabis dispensary in Maryland. In addition, Mission has entered into licensing agreements with three additional locations in Maryland. These locations are expected to open in Fall of 2018 and Winter 2019.

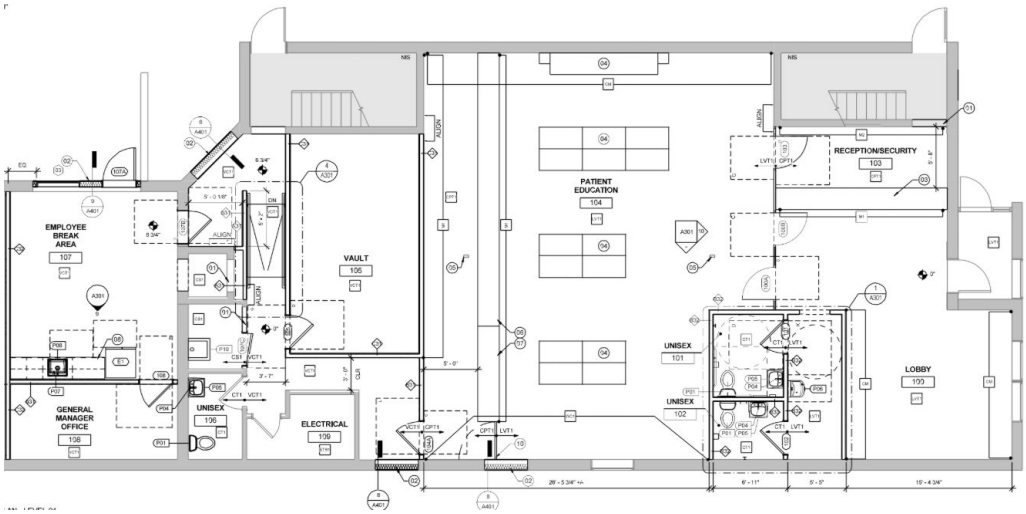
Mission Hampden



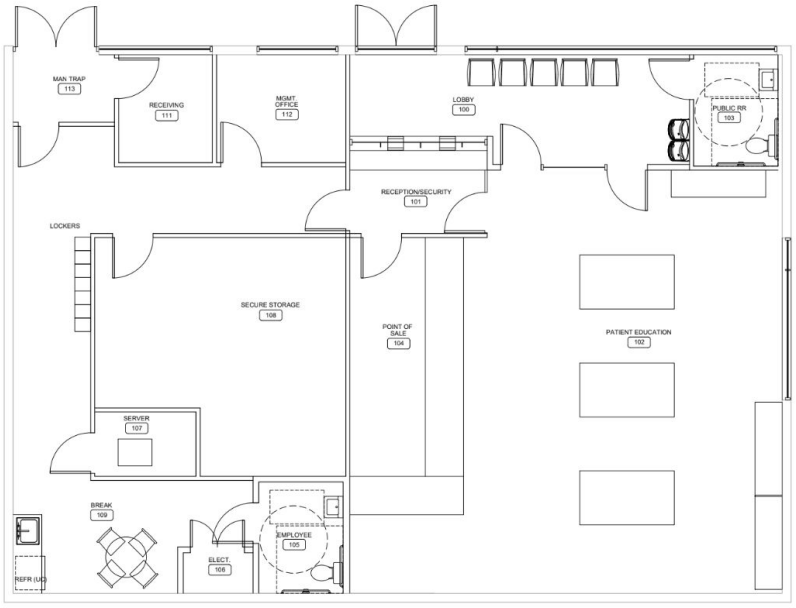
Mission Catonsville



Mission Glenmont



Mission Olny



Mission Massachusetts

About Us

Mission MA is led by an exceptional team who have come together with the common goal of operating a best-in-class legal marijuana establishment. Along with 4Front, Mission MA will engage national experts who share the vision of helping others and providing medical marijuana in a safe and transparent manner. Mission MA will operate a clean, modern facility that emphasizes health, wellness and responsibility.

We believe the Commonwealth's legal marijuana regulatory framework provides a unique opportunity for Mission MA – not simply to provide medical and adult use marijuana, but to become the leading provider of cannabis in the Massachusetts market by providing the best possible product at the best possible level of service for the most reasonable cost available to the state's patients and adult consumers.

Mission Statement

Mission Massachusetts is committed to creating a professional legal cannabis company with a clear orientation toward providing patient-forward care and services. Our policies and procedures for cultivating, processing, and dispensing marijuana and providing personalized patient experiences ensure safe products and a secure, warm environment to meet the unique needs of patients and consumers. Our Standard Operating Procedures have been reviewed by Americans for Safe Access (ASA) and are compliant with their industry standard for Patient Focused Certification (PFC). We will add value to our community through acts of service, educational offerings, charitable donations, active civic participation and providing medicine at low costs to patients who have limited financial means.

Company Goals and Objectives

Mission MA is committed to:

- best-in-class standard operating procedures (SOPs) focused on patient access and safety that are compliant with the industry standard for Patient Focused Certification (PFC) through Americans for Safe Access,
- prudent financial planning and adequate capital resources based upon significant experience and analysis of existing regulated marijuana markets,
- unparalleled patient forward service, safety and community building to the patients and surrounding community of our center,
- industry-leading, battle-tested HR policies to optimize operational efficiency and performance, and
- a highly competent management team and group of advisors with significant marijuana, security, retail, and general business experience.

As outlined in this business plan, Mission MA is committed to maximizing the likelihood of our success. Based upon significant investment in upfront diligence and planning, we are confident in the merits of our strategy and our capabilities to execute our plan. We have successfully executed similar plans and have a comprehensive understanding of what it takes to provide a safe and secure environment for patients and the community.

The hours of operation for Mission's retail stores will be from 10am-7pm, seven days a week.

Personnel

We understand the important role a robust Human Resources platform plays in achieving success. Staffing our facility with the right people provides the greatest opportunity to prevent theft and diversion and provide the highest level of products and services to our guests and safety for the guests and to the community.

We are committed to providing the best possible climate for maximum development and goal achievement for all employees. Our practice is to treat each employee as an individual. We seek to develop a spirit of teamwork: individuals working together to attain a common goal.

In order to maintain an atmosphere where these goals can be accomplished, we provide a comfortable and progressive workplace. Most importantly, we have a workplace where communication is open and problems can be discussed and resolved in a mutually respectful atmosphere. We take into account individual circumstances and the individual employee.

We have a comprehensive staffing plan in place to guide the recruitment, hiring, training and management of our employees. Highlights of the plan feature:

Precise definitions of responsibility, including job descriptions and employment contracts;

Clearly understood chains of authority, including an organizational chart and supervisory duties (specified in our job descriptions);

Well-paid, well-qualified and well-trained personnel;

Professional recruiting practices;

Thorough training of new hires;

A strong commitment to employee safety and wellness;

A robust and highly documented performance management system, including systematic performance reviews and resolution of performance issues up to and including termination.

Staffing schedules will be based around the needs of our organization and our clients, with attention paid to creating positive working conditions for our employees. Staffing schedules, combined with installed security systems and facility design, will provide a safe and secure environment.

As stated in our Employee Handbook, feedback on job performance is expected to occur regularly. Once each year, an employee's department manager will formally review an employee's job progress within the organization and help set new job performance plans which will be reviewed with the employees, and the employees will acknowledge receipt.

We firmly believe that with direct communication, we can continue to resolve any difficulties that may arise and develop a mutually beneficial relationship. Especially critical to this philosophy is our use of counseling and progressive discipline for employee performance improvement.

We will hire local members of the community to work within our facility. We will provide a living wage as well as a quality benefits package for our workers. Being a responsible employer will help ensure good community relations.

All full time employees will receive medical, vision, and dental insurance coverage in accordance with applicable laws from a reputable carrier that we have selected. We have selected a plan that will afford the most coverage to our employees while also complying with the Affordable Healthcare Act.

We also will put in place a retirement program consisting of a 401(k) savings plan available to all regular employees who have completed six months of employment. We also will offer Workers Compensation coverage for our employees, based on conversations with local insurance providers.

We will employ stringent human resources (HR) compliance practices and documentation relating to our operations and training. With the aid of HR legal counsel, we have developed customized tools and processes to ensure effective hiring, interviewing, managing human resource files and confidentiality, orientation training, completing new hire paperwork, and ensuring understanding of company policies and procedures.

All agents will be hired on a ninety-day probationary status. During this period, they will participate in a rigorous training process, and be evaluated for suitability in a restricted-access medical environment. As

referenced earlier, we have engaged the services of 4Front Advisors to help build our company compliance and training platform.

All training will be documented and filed in each employee's human resource file securely located in the management office. It is the responsibility of our General Manager to ensure that all necessary employee training is conducted and appropriately memorialized in our system of record. It is the further responsibility of our General Manager to ensure that any necessary remedial training is conducted and recorded. All training records will be internally reviewed and audited at least once a year, but can be as needed.

Market Analysis

Regulatory Context

Fees

Retail

- Retail Application Fee: $300
- Annual License Fee: $5,000

Cultivation

- Tier 1 Cultivation (Indoor) Application: $400
- Annual License Fee: $2,500

Manufacturing

- Manufacturing Application: $300
- Annual License Fee: $5,000

Financial Projections

Accurately quantifying the size of the market is challenging, yet we believe we have developed realistic financial projections based upon the feedback we have received from our advisors, our existing operations and from analyzing the size of similar state-legal medical marijuana markets. We forecast the financial performance of our projects using a monthly, demand-driven model.

After deriving an estimate for the total market size for medical marijuana in Massachusetts, we implemented a plan to optimize our productions based on our available square footage which will enable us to be a sufficient supplier to the market in the early years of the program. Our plan and past cultivation experience will allow us to avoid the over-building of cultivation capacity we have witnessed in other emerging markets, which puts an overall financial and operational strain on the industry at a time we believe the market should be more focused on quality medical marijuana access.

To determine revenue projections, we forecasted month-over-month penetration growth rates for the Massachusetts service area. We then took historical consumption metrics in existing markets for adult use/medical marijuana products and adjusted them for Massachusetts regulatory and business environment. Combining these consumption estimates with our price forecast allows us to estimate monthly sales for the

Massachusetts market as well as our dispensaries' share of those sales. The key assumptions driving our financial model are outlined below.

Key Assumptions

Operations

- We assume Mission Worcester's cultivation will be able to open in January of 2019 with:
  - One (1) 21,000ft^2 cultivation/processing facility
    - Flowering Canopy Capacity of: 6,670ft^2
      - 14,330 ft^2 reserved for offices, processing, packaging, headhouse, etc.
- Mission Worcester will be able to produce a full range of products including dried and cured flower, concentrates, vape pen cartridges, infused edible products, and topical and transdermal products.
  - Flower wholesale pricing: $2,350 per pound (decreases by $150 per pound annually)
  - Oil/concentrate wholesale price: $24,500 per pound (decreases by $500 per pound annually)

Capital Expenditure

- Dispensary leasehold improvements: $260/ft^2 ($1,300,000 total)
- Indoor grow leasehold improvements: $290.50/ft^2 ($6,100,000 total)
- Soft Costs: $91,000
- Security System: $50,000
- Pre-Opening Expenses: $350,000
- Working and Contingency Capital: $509,355
- Opening Cash Balance: $100,000
- Licensing Costs (Included in Pre-Opening Expenses):
  - Retail (Brick and Mortar)
    - Application: $300
    - Registration (yearly): $5,000
  - Tier 1 Cultivation (Indoor)
    - Application: $200
    - Registration (yearly): $1,250
  - Manufacturing
    - Application: $300
    - Registration (yearly): $5,000

Lease Rates

- Retail space: 5,000ft^2 total leased @ $5.75/ft^2 annually

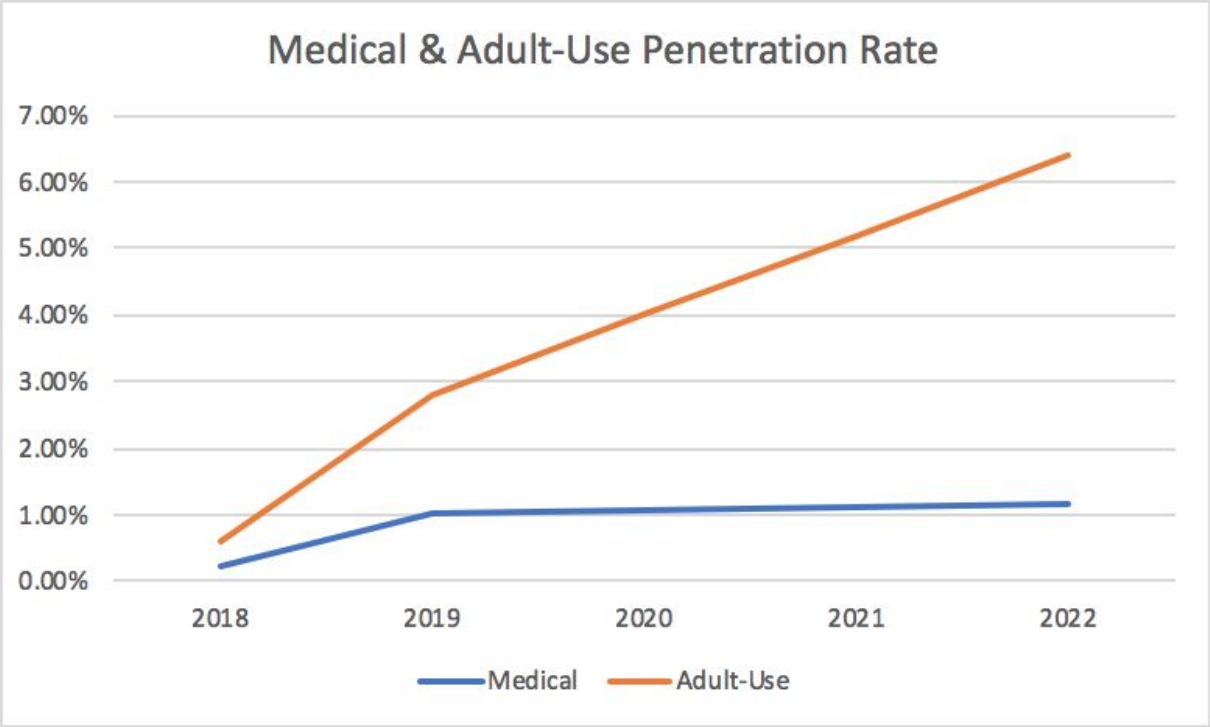
- Indoor grow space: 21,000ft^2 total leased @ $5.75/ft^2 annually

Financing

- Capital expenditures are assumed to be 100% equity financed
- Total equity contribution: $8,500,355
- A small portion of the ongoing working capital needs will be provided as a loan from members of the ownership group.

Patient Penetration Rates

- We have used publicly available data from other legal markets in order to estimate the penetration rates for both medical and adult-use marijuana based on similar programs in other states.



Retail Competition

- Assumes three competitors to start and factors in an additional competitor every eighteen months. All competitors receive equal market share of medical patients and adult-use customers.

Annual Forecast

Income Statement	2018	2019	2020	2021	2022
Gross Revenues					
Medical Retail Sales	$108,830	$1,770,992	$2,155,165	$1,994,922	$1,868,277
Adult-Use Retail Sales	$272,075	$4,527,925	$7,126,446	$8,494,545	$9,576,044
Cultivation Wholesale Sales	$0	$12,970,196	$12,883,039	$12,781,627	$12,664,341
Total Revenues	380,905	19,269,113	22,164,650	23,271,094	24,108,663
COGS					
Dispensary COGS	$209,498	$3,433,220	$4,929,178	$5,413,917	$5,735,479
Cultivation COGS	$0	$7,488,566	$7,742,211	$8,008,538	$8,288,182
Total COGS	209,498	10,921,786	12,671,389	13,422,455	14,023,660
Gross Profit	**171,407**	**8,347,328**	**9,493,262**	**9,848,639**	**10,085,003**
Gross margin	*45%*	*43%*	*43%*	*42%*	*42%*
SG&A (Operating Expenses)					
Dispensary SG&A	$99,035	$1,596,139	$2,178,941	$2,253,541	$2,230,326
Cultivation SG&A	$0	$1,945,529	$1,674,795	$1,405,979	$1,393,078
Total SG&A	99,035	3,541,668	3,853,736	3,659,520	3,623,404
EBITDA	**72,372**	**4,805,659**	**5,639,525**	**6,189,119**	**6,461,599**
EBITDA margin	*19%*	*25%*	*25%*	*27%*	*27%*
D&A	(40,704)	(816,650)	(816,650)	(816,650)	(816,650)
Operating Income (EBIT)	31,668	3,989,009	4,822,875	5,372,469	5,644,949
Interest Expense	0	179,941	33,945	0	0
Pre-Tax Income	**31,668**	**3,809,069**	**4,788,930**	**5,372,469**	**5,644,949**
Reserve for Taxes (280e)	35,996	1,149,959	1,428,094	1,543,174	1,636,473
Net Income	**($4,328)**	**$2,659,109**	**$3,360,837**	**$3,829,295**	**$4,008,476**

Client#: 1665055 MISSIONMA

ACORD™ CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY) 0//

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

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

PRODUCER	CONTACT NAME: Stephen Scardello
USI Insurance Services LLC 2375 E. Camelback Rd, Suite 250 Phoenix, AZ 85016 602 279-5800	PHONE (A/C, No, Ext): 602-374-135 FAX (A/C, No): E-MAIL ADDRESS:

INSURER(S) AFFORDING COVERAGE	NAIC #
INSURER A : Kinsale Insurance Company	38920
INSURER B :	
INSURER C :	
INSURER D :	
INSURER E :	
INSURER F :	

INSURED
Mission MA, Inc.
5060 N. 40th St., Suite 120
Phoenix, AZ 85018

COVERAGES **CERTIFICATE NUMBER:** **REVISION NUMBER:**

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

INSR LTR	TYPE OF INSURANCE	ADDL INSR	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS	
A	X COMMERCIAL GENERAL LIABILITY			01000715430	08/13/2018	08/13/2019	EACH OCCURRENCE	$1,000,000
	CLAIMS-MADE X OCCUR						DAMAGE TO RENTED PREMISES (Ea occurrence)	$100,000
							MED EXP (Any one person)	$0
							PERSONAL & ADV INJURY	$1,000,000
	GEN'L AGGREGATE LIMIT APPLIES PER:						GENERAL AGGREGATE	$2,000,000
	POLICY PRO-JECT LOC						PRODUCTS - COMP/OP AGG	$0
	OTHER:							$
	AUTOMOBILE LIABILITY						COMBINED SINGLE LIMIT (Ea accident)	$
	ANY AUTO						BODILY INJURY (Per person)	$
	OWNED AUTOS ONLY / SCHEDULED AUTOS						BODILY INJURY (Per accident)	$
	HIRED AUTOS ONLY / NON-OWNED AUTOS ONLY						PROPERTY DAMAGE (Per accident)	$
								$
	UMBRELLA LIAB OCCUR						EACH OCCURRENCE	$
	EXCESS LIAB CLAIMS-MADE						AGGREGATE	$
	DED RETENTION $							$
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY Y / N						PER STATUTE OTH-ER	
	ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED?	N / A					E.L. EACH ACCIDENT	$
	(Mandatory in NH)						E.L. DISEASE - EA EMPLOYEE	$
	If yes, describe under DESCRIPTION OF OPERATIONS below						E.L. DISEASE - POLICY LIMIT	$

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

CERTIFICATE HOLDER

Proof of Insurance

CANCELLATION

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

AUTHORIZED REPRESENTATIVE

William M. Bleiler

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Plan for Separating Adult Use from Medical Operations

Mission MA, Inc. ("Mission") has developed comprehensive plans to ensure virtual and physical separation between medical and adult use operations, in accordance with 935. CMR.500.101(2)(e)(4).

Mission will utilize its Point of Sale (POS) software to virtually separate medical and adult-use operations by designating at the point of sale whether a particular marijuana product is intended for sale as a medical product or as an adult use product.

In order to ensure compliance with 935 CMR 500.140(10), Mission will ensure that registered patients have access to a sufficient quantity and variety of marijuana and marijuana products to meet their medical needs. For the first six months of operations, 35% of Mission's inventory will be marked for medical use and reserved for our registered patients. Following this six month period, a quantity and variety of marijuana products for patients that is sufficient to meet the demand indicated by an analysis of sales data collected during the preceding six months will be marked and reserved for registered patients. Products reserved for registered patients will be kept either on site or at another Mission location from which it can be transferred from within 48 hours.

Mission will provide physical separation between the area designated for sales of medical marijuana products to patients/caregivers and the area designated for sales of adult-use marijuana products to individuals 21 years of age or older. This separation will take the form of divider which creates a separate dedicated queue for medical transactions. The line will be reserved only for patients with a valid Medical Use of Marijuana Program ID Card. While this queue will be reserved for medical purchases, patients are free to utilize any queue while making purchases, and are not only restricted to the medical purchase queue.

Mission retail facilities also feature a private area separate from the sales floor where medical patients can receive consultation regarding medical marijuana use and our available medical cannabis products.

Plan for Restricting Access to Ages 21 and Older

Pursuant to 935 CMR 500.050(5)(b), Mission MA, Inc. ("Mission") will only be accessible to consumers 21 years of age or older with a verified and valid, government-issued photo ID or in possession of a Program ID Card demonstrating the individual is a registered and active qualifying patient with the Medical Use of Marijuana Program.

Upon entry into the premises of the marijuana establishment by an individual, a Mission registered agent will immediately inspect the individual's proof of identification and determine the individual's age, in accordance with 935 CMR 500.140(2).

In the event Mission learns of its agents intentionally or negligently sold marijuana to an individual under the age of 21, the agent will be immediately terminated and the Commission will be promptly notified, pursuant to 935 CMR 500.105(1)(l). Mission will not hire any individuals who are under the age of 21 or who have been convicted of distribution of controlled substances to minors, pursuant to 935 CMR 500.030(1).

In accordance with 935 CMR 500.105(4)(b)(13), the website for Mission will require all online visitors to verify they are 21 years of age or older prior to accessing the page.

Pursuant to 935 CMR 500.105(4), Mission will not engage in any marketing, advertising, or branding practices that are targeted to, deemed to appeal to or portray minors under the age of 21. Mission will also ensure that, pursuant to 935 CMR 500.150(1)(b), no edible products that are manufactured or sold will feature realistic or fictional human, animal, or fruit, including artistic, caricature or cartoon renderings, and that all packaging for any marijuana or marijuana products will not use bright colors, resemble existing branded products, feature cartoons or celebrities commonly used to market products to minors,feature images of minors or other words that refer to products commonly associated with minors or otherwise be attractive to minors.

MISSION

Recordkeeping

To ensure that Mission MA, Inc ("Mission") is keeping and retaining all records as noted in this policy, reviewing Corporate Records, Business Records, and Personnel Records to ensure completeness, accuracy, and timeliness of such documents will occur as part of Mission's quarter-end closing procedures. In addition, Mission's operating procedures will be updated on an ongoing basis as needed and will undergo a review by the executive management team on an annual basis. Mission will report to to the Commission and law enforcement any loss or unauthorized alteration of records related to marijuana. All records will be made available to the Commission upon request.

Corporate Records

Mission will maintain records regarding the corporation, its structure, contracts, and licenses. These records will include, at a minimum:

- Insurance and Liability Coverage
- Third Party Laboratory Contracts
- Commission requirements, including Annual Agent/Establishment Registration
- Local Compliance (Certificate of Occupancy, Special Permits, etc..,)
- Annual Report
- Secretary of State Filings

Business Records

Mission will maintain records of all business transactions and activity. These records will include, at a minimum:

- Assets and liabilities;
- Monetary transactions;
- Books of accounts, which will include journals, ledgers, and supporting
- documents, agreements, checks, invoices, and vouchers;
- Sales records including the quantity, form, and cost of marijuana products;
- Vehicle inspection records
- Records of monthly analysis of equipment and sales data, in accordance with 935 CMR 500.140(6)(d)
- Salary and wages paid to each agent, and any executive compensation, bonus,
- benefit, or item of value paid to any individual affiliated with Mission, including members, if any

Personnel/Training Records

Mission will maintain personnel files for all it's employees. These files at a minimum will include:

- Job descriptions for each agent and volunteer position, as well as organizational charts consistent with the job descriptions;
- A personnel record for each marijuana establishment agent. Such records will be maintained for at least twelve (12) months after termination of the agent's affiliation with Mission and will include, at a minimum, the following:
    - All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
    - Documentation of verification of references;
    - The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
    - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
    - Documentation of periodic performance evaluations; and
    - A record of any disciplinary action taken.
    - Notice of completed responsible vendor and eight-hour related duty
    - Training.
- A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
- Personnel policies and procedures; and
- All background check reports obtained in accordance with 935 CMR 500.030.
- Vendor training compliance records in accordance with with 935 CMR 500.105.(2)(b)5.

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

Marijuana/Marijuana Product Testing Result Records

Mission will maintain the test results for all marijuana and marijuana products for a minimum of one year. These records will be available to the Commission upon request.

Inventory Records

Mission will use seed-to-sale tracking software (in conjunction with Metrc) to maintain real-time inventory. The tracking software inventory reporting will meet the requirements specified by the Commission and 935 CMR 500.105(8)(c) and (d), including, at a minimum, an inventory of marijuana plants; marijuana plant-seeds and clones in any phase of development such as propagation, vegetation, flowering; marijuana ready for dispensing; all marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal. Inventory records will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory.

Mission will maintain records of all marijuana products that are reserved for medical patients. Mission will perform audits of patient supply available on a weekly basis and retain those records for a period of six months.

Incident Reporting

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

Visitor Records

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

Waste Disposal

When marijuana or marijuana products are disposed of, Mission will create and maintain a written record of the date, the type and quantity disposed of or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two Mission agents present during the disposal or handling, with their signatures. Mission will keep disposal records for at least three (3) years. This period will automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.

Security Records

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

Transportation Manifests

Mission will retain all shipping manifests for a minimum of one (1) year and make them available to the Commission upon request.

Policies and Procedures

Policies and Procedures related to Mission's operations will be updated on an ongoing basis as needed and undergo a review by the executive management team on an annual basis. Policies and Procedures will include the following:

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

- A description of Mission's hours of operation and after-hours contact information, which will be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
- Storage of marijuana in compliance with 935 CMR 500.105(11);
- Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be dispensed; ○ Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.160;
- Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
- A staffing plan and staffing records in compliance with 935 CMR 500.105(9);
- Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
- Alcohol, smoke, and drug-free workplace policies;
- A plan describing how confidential information will be maintained;
- Policy for the immediate dismissal of any dispensary agent who has:
    - Diverted marijuana, which will be reported the Police Department and to
    - the Commission;
    - Engaged in unsafe practices with regard to Mission operations, which will be
    - reported to the Commission; or
    - 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.
- A list of all executives of Mission, and members, if any, of the licensee must be made available upon request by any individual. (935 CMR 500.105(1)(m) requirement may be fulfilled by placing this information on Mission's website.)
- Policies and procedures for the handling of cash on Mission premises including but
- not limited to storage, collection frequency and transport to financial
- institution(s).
- Policies and procedures to prevent the diversion of marijuana to individuals
- younger than 21 years old.
- Policies and procedures for energy efficiency and conservation that will include:
    - 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;

- Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on site, and an explanation of why the identified opportunities were not pursued, if applicable;
- Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
- Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25 § 21, or through municipal lighting plants.

Record Retention and Closure

Mission will meet Commission recordkeeping requirements and retain a copy of all records for two years, unless otherwise specified in the regulations.

In the event Mission closes, all records will be kept for at least two years at Mission's expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission. In addition, Mission will communicate with the Commission during the closure process and accommodate any additional requests the Commission or other state agencies may have.

Quality Control and Testing

Mission MA, Inc. will make every effort to ensure product quality and safety for all marijuana and marijuana-infused products (MIPs). All products will be thoroughly inspected before being placed on our shelves. If any concerns are raised, the product will be removed from the shelves until it passes further inspection. Any products that do not meet our strict quality standards will not be made available to consumers. Any product that exhibits a probability that the product might cause adverse health consequences will be recalled and disposed of in accordance with 935 CMR 500.105(12).

No marijuana product will be sold or otherwise marketed for adult use that has not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160. Testing of marijuana products will be performed by an Independent Testing Laboratory.

Mission have a written policy for responding to laboratory results that indicate contaminant levels are above acceptable limits established in the DPH protocols identified above. Any such policy will include:

- Notifying the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch; and
- The notification must be from both this Marijuana Establishment and the Independent Testing Laboratory, separately and directly; and
- The notification from this Marijuana Establishment must describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services will comply with 935 CMR 500.105(13), and all storage and transportation of marijuana and MIPs will be under conditions that will protect against deterioration and physical, chemical, and microbial contamination.

All storage of marijuana at a laboratory providing marijuana testing services will comply with 935 CMR 500.105(11).

Testing of environmental media (e.g., soils, solid growing media, and water) will be performed in compliance with the Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries published by the DPH.

All excess marijuana must be disposed of in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to the source Marijuana Establishment for disposal or by the Independent Testing Laboratory disposing of it directly.

For any recalled products, we will immediately notify the Marijuana Cultivator or Marijuana Product Manufacturer from whom the product was purchased that the product is defective so they make take the proper remedial action. Mission will maintain the results of all testing for no less than one year.

Qualifications and Training

Qualifications

In accordance with 935 CMR 500.030, a candidate for employment as a marijuana establishment agent must be 21 years of age or older. In addition, the candidate cannot have been convicted of a criminal offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States, or foreign jurisdiction, or a military, territorial, or Native American tribal authority.

Mission will also ensure that its employees are suitable for registration consistent with the provisions of 935 CMR 500.802. In the event that Mission discovers any of its agents are not suitable for registration as a marijuana establishment agent, the agent's employment will be terminated, and Mission will notify the Commission within one (1) business day that the agent is no longer associated with the establishment.

Training

As required by 935 CMR 500.105(2), and prior to performing job functions, each of Mission's agents will successfully complete a comprehensive training program that is tailored to the roles and responsibilities of the agent's job function. Agent training will at least include the Responsible Vendor Program and eight (8) hours of on-going training annually. On or after July 1, 2019, all of Mission's current owners, managers, and employees will have attended and successfully completed a Responsible Vendor Program operated by an education provider accredited by the Commission to provide the annual minimum of two hours of responsible vendor training to marijuana establishment agents. Mission's new, non-administrative employees will complete the Responsible Vendor Program within 90 days of the date they are hired. Mission's owners, managers, and employees will then successfully complete the program once every year thereafter. Mission will also encourage administrative employees who do not handle or sell marijuana to take the responsible vendor program on a voluntary basis to help ensure compliance. Mission's records of responsible vendor training program compliance will be maintained for at least four (4) years and made available during normal business hours for inspection by the Commission and any other state licensing authority upon request.

As part of the Responsible Vendor program, Mission's agents will receive training on a variety of topics relevant to marijuana establishment operations, including but not limited to the following:

1. Marijuana's effect on the human body, including physical effects based on different types of marijuana products and methods of administration, and recognizing the visible signs of impairment;
2. Best practices for diversion prevention and prevention of sales to minors;
3. Compliance with tracking requirements;
4. Acceptable forms of identification, including verification of valid photo identification and medical marijuana registration and confiscation of fraudulent identifications;
5. Such other areas of training determined by the Commission to be included; and
6. Other significant state laws and rules affecting operators, such as:
    a. Local and state licensing and enforcement;
    b. Incident and notification requirements;
    c. Administrative and criminal liability and license sanctions and court sanctions;
    d. Waste disposal and health and safety standards;
    e. Patrons prohibited from bringing marijuana onto licensed premises;
    f. Permitted hours of sale and conduct of establishment;
    g. Permitting inspections by state and local licensing and enforcement authorities;
    h. Licensee responsibilities for activities occurring within licensed premises;
    i. Maintenance of records and privacy issues; and
    j. Prohibited purchases and practices.

In addition to the training requirements mandated by 935 CMR 500.105(2), all Mission Agents will take part in Mission's 40 hour training program. This program is one of the few in the nation that is fully compliant with Americans for Safe Access' industry standard for Patient Focused Certification. The topics covered in this program will include, but are not limited, to:

<u>Day 1: Intros and tools</u>

- The trainer's mindset
- Framing the dialogue
- History
- Culture
- Today's legal landscape
- Document/SOP review
- Daily recap

<u>Day 2: Leading a world class team</u>

- HR and Employment Law
- Training your team
- Coaching and Development
- Mission Statement/ 10pt checklist
- Collecting and using data
- Daily recap

Day 3: Training operations

- Getting to know the plant and cultivation
- Medical benefits
- State compliance
- Getting help
- Intro to Patient Services
- Intro to Safety and Security
- Intro to Inventory
- Daily recap

Day 4: Data, drills and opening

- Member Services walk through/role play
- Patient Services walk through/role play
- Inventory walk through/role play
- Opening / Closing the Dispensary
- Program recap

Maintaining of Financial Records

Mission MA, Inc.'s ("Mission") operating policies and procedures ensure financial records are accurate and maintained in compliance with the Commission's Adult Use of Marijuana regulations (935 CMR 500). Financial records maintenance measures include policies and procedures requiring that:

- Confidential information will be maintained in a secure location, kept separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the Commission may access this information to carry out its official duties.
- All recordkeeping requirements under 935 CMR 500.105(9) are followed, including:
    - Keeping written business records, available for inspection, and in accordance with generally accepted accounting principles, which will include manual or computerized records of:
        - Assets and liabilities;
        - Monetary transactions;
        - Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
        - Sales records including the quantity, form, and cost of marijuana products; and
        - Salary and wages paid to each employee and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a marijuana establishment, including members, if any.
- All sales recording requirements under 935 CMR 500.140(6) are followed, including:
    - Utilizing a point-of-sale (POS) system approved by the Commission, in consultation with the DOR, and a sales recording module approved by DOR;
    - Conducting a monthly analysis of its equipment and sales date, and maintaining records, available to the Commission upon request, that the monthly analysis has been performed;
    - Complying with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements;
    - Adopting separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales;
    - Maintaining such records that would allow for the Commission and the DOR to audit and examine the point-of-sale system used in order to ensure compliance with Massachusetts tax laws and 935 CMR 500; and
    - If co-located with a medical marijuana treatment center, maintaining and providing the Commission on a biannual basis accurate sales data collected by the licensee during the six months immediately preceding this application for the purpose of

ensuring an adequate supply of marijuana and marijuana products under 935 CMR 500.140(10).

- Additional written business records will be kept, including, but not limited to, records of: ○ Compliance with liability insurance coverage or maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16);
    - Fees paid under 935 CMR 500.005 or any other section of the Commission's regulations; and
    - Fines or penalties, if any, paid under 935 CMR 500.550 or any other section of the Commission's regulations.

PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS

Overview

Mission Massachusetts, Inc. ("Mission") will maintain personnel records as a separate category of records due to the sensitivity and importance of information concerning agents, including registration status and background check records. Mission will keep, at a minimum, the following personnel records:

- Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
- A personnel record for each marijuana establishment agent;
- A staffing plan that will demonstrate accessible business hours and safe conditions;
- Personnel policies and procedures; and
- All background check reports obtained in accordance with 935 CMR 500.030.

Job Descriptions

Director of Security: Under the supervision of the Chief Executive Officer, the Director of Security is responsible for the development and overall management of the Security Policies and Procedures for Mission, while implementing, administering, and revising the policies as needed. In addition, the Director of Security will perform the following duties:

- Provide general training to Mission agents during new hire orientation or re-current trainings throughout the year;
- Provide training specific for Security Agents prior to the Security Agent commencing job functions;
- Review and approve incident reports and other reports written by Security Agents prior to submitting to the executive management team—follow up with security agent if needed;
- Maintain lists of agents authorized to access designated areas of the Mission facility, including cash and product storage vaults, the surveillance and network equipment room, and other highly sensitive areas of the Mission facility;
- Lead a working group comprised of the Chief Executive Officer, Chief Operating Officer, and any other designated advisors to ensure the current policies and procedures are properly implemented, integrated, effective, and relevant to ensure the safety of Mission agents and assets;

- Ensure that all required background checks have been completed and documented prior to an agent performing job functions; ensure agent is granted appropriate level of access to the facility necessary to complete his/her job functions;
- Maintain all security-related records, incident reports and other reports written by security agents;
- Evaluate and determine the number of Security Agents assigned to each shift and proper shift change times; and
- Maintain frequent contact with local law enforcement authorities.

Security Agent: Security Agents monitor Mission's security systems including alarms, video surveillance, and motion detectors. Security Agents are responsible for ensuring that only authorized individuals are permitted access to the Mission facility by verifying appropriate ID cards and other forms of identification. In addition, Security Agents perform the following duties and other duties upon request:

- Investigate, communicate, and provide leadership in the event of an emergency such as an intrusion, fire, or other threat that jeopardizes customers, authorized visitors, and Mission agents;
- Respond and investigate security situations and alarm calls; clearly document the incident and details surrounding the incident in a written report for the Director of Security;
- Oversee the entrance to the facility and verify credentials of each person seeking access to the Mission facility;
- Answer routine inquiries;
- Log entries, and maintain visitor log;
- Escort authorized visitors in restricted access areas; and
- Escort Mission agents from the facility during non-business hours and perform security checks at designated intervals.

Inventory Manager: The Inventory Manager is responsible for inventory on a day-to-day basis as well as the weekly and monthly inventory counts and waste disposal requirements. The inventory manager will perform the comprehensive annual inventory in conjunction with the executive management team. Additional duties include, but are not limited to:

- Implementing inventory controls to track and account for all dispensary inventory;
- Implementing procedures and notification policies for proper disposal;
- Maintaining records, including operating procedures, inventory records, audit records, storage and transfer records;
- Maintaining documents with each day's beginning, acquisitions, sales, disposal, and ending inventory; and
- Proper storing, labeling, tracking, and reporting of inventory.

Inventory Associate: Inventory Associates support the Inventory Manager during day-to-day operations. Responsibilities include, but are not limited to:

- Maintaining records, including operating procedures, inventory records, audit records, storage and transfer records;
- Maintaining documents with each day's beginning, acquisitions, sales, disposal and ending inventory;
- Ensuring products are properly stored, labeled, and recorded in the BioTrackTHC system;
- Ensuring waste is properly stored; and
- Coordinating the waste disposal schedule and ensuring Mission's policies and procedures for waste disposal are adhered to.

Human Resources Manager: The Human Resources Manager at Mission will support the executive management team on a day-to-day basis to effectively implement all personnel policies and procedures for Mission, including hiring processes. The Human Resources Manager will:

- Oversee hiring and release of Mission agents;
- Review and revise Mission personnel policies and procedures in consultation with the executive management team and department managers;
- Develop training schedules and policies for Mission agents under the supervision of the executive management team and department managers;
- Handle any and all agent discipline as necessary;
- Ensure compliance with any and all workplace policy laws and requirements; and
- Be responsible for such additional human resources tasks as determined by the executive management team.

Director of Cultivation: The Director of Cultivation is responsible for all daily operations and maintenance of the Cultivation Facility. The Director of Cultivation will:

- Be responsible for implementing policies with the Cultivation Facility;
- Coordinate space assignments;
- Receive and review work requests;
- Coordinate repairs and maintenance;
- Supervise and train agents in an ongoing capacity;
- Provide mandatory training for new agents;
- Maintain a record of space allocations;
- Work with Cultivation Technicians to promote successful operations in the Cultivation Facility;
- Program and monitor the Direct Digital Control (DDC).

- Maintain a database of environmental controls and conditions;
- Adjust DDC for optimum efficiency of operation;
- Provide pesticide recommendations and ensure IPM Program is sufficient.

Cultivation Manager: The Cultivation Manager supervises and participates in all aspects of daily Cultivation Facility tasks. The Cultivation Manager operates under the supervision of the Director of Cultivation and will:

- Instruct Cultivation Technicians on operation procedures;
- Train and supervise Cultivation Technicians;
- Assist with the activities performed by all Cultivation Technicians;
- Instruct agents or apply pesticides with guidance from the Director of Cultivation;
- Perform routine maintenance;
- Maintain inventory of all cultivation supplies and order such supplies;
- Report daily to Director of Cultivation; and
- Coordinate with relevant staff regarding harvest schedules.

Cultivation Technician: Cultivation Technicians are responsible for all daily tasks in their assigned areas within the Cultivation Facility. Cultivation Technicians report directly to Cultivation Manager and/or Director of Cultivation. Responsibilities include, but are not limited to:

- Irrigation;
- Pruning;
- Pesticide application;
- Potting/Re-potting;
- Propagation;
- Light construction; and
- Janitorial duties (i.e. cleaning, disinfecting, sterilizing).

Production Manager: The Production Manager is responsible for all post-harvest handling of marijuana. The Production Manager coordinates directly with the Cultivation Manager regarding harvest schedules. Production Manager reports directly to the Director of Cultivation and is responsible for the following:

- Transitioning harvested plant material from cultivation rooms to the Trim Room where marijuana is trimmed via machine and manually;
- Overseeing Trim Technicians and delegates daily tasks to production agents;
- Ensuring quality control of finished marijuana flowers;
- Monitoring the status of the Dry Room and of marijuana flowers that are in the process of drying;

- Entering wet and dry weights of all product including flowers and trim into BioTrackTHC;
- Working with Cultivation Technicians to ensure prompt transfer of marijuana trim to relevant room within the Cultivation Facility;
- Overseeing bulk packaging and storing in dedicated vault; and
- Relaying information to the Inventory Manager for sales purposes.

Trim Technicians: Trim Technicians are responsible for post-harvest trimming of marijuana plants, both mechanical and manual. Trim Technicians report directly to the Production Manager and are responsible for:

- Receiving daily tasks from the Production Manager;
- Assisting in the harvest of marijuana;
- Trimming marijuana plants;
- Maintaining a sterile environment in the Trim Room; and
- Cleaning and maintaining scissors and trim machines.

Production Manager: Responsible for production of all concentrates and marijuana products created by Mission. This includes, but is not limited to:

- Managing inventory and par-levels of all concentrate and marijuana products, including integration into the BioTrackTHC;
- Creating raw Super Critical CO2 (SCCO2) concentrate;
- Creating distilled, high-purity concentrate for use in marijuana products and vaporizer cartridges;
- Creating all marijuana products;
- Organizing extraction schedule based on availability of cultivated material;
- Maintaining a rigid cleaning schedule that all lab agents must adhere to;
- Ensuring safety pursuant to established safety protocols;
- Coordinating facility repairs and maintenance;
- Supervising and training agents in an ongoing manner; and
- Providing mandatory training for new agents.

Lab/Production Assistant: Responsible for supporting the Production Manager during day-to-day operations. This includes, but is not limited to:

- Drying and grinding cultivated material in preparation for SCCO2 extraction;
- Unpacking and cleaning the SCCO2 extractor;
- Cleaning and sanitization of all lab glassware;
- Cleaning and sanitization of all kitchen cookware and utensils;
- Cleaning and sanitization of the distillation still;

- Routine scheduled maintenance of all equipment; and
- Assisting with packaging of all concentrate and marijuana products to be sold.

Retail Manager: Responsible for overseeing all Member Services Agents and managing day-to-day operations of the retail facility. This includes, but is not limited to:

- Implementing inventory tracking;
- Training retail staff;
- Ensuring customer satisfaction through feedback tools;
- Reporting all incidents and complaints to the executive team; and
- Working with bookkeeping to ensure precise data flow.

Member Services Agent: Member Services Agents ensure that each customer is treated with respect while at a Mission facility and that each customer receives the appropriate amount of individualized attention in order to address his/her specific needs and questions. Member Services Agent responsibilities include, but are not limited to:

- Maintaining a clean, safe, healthy, and productive environment ensuring that customers have a positive experience at a Mission facility;
- Answering customer questions regarding products including, but not limited to, flowers, concentrates, tinctures, and edibles;
- Being knowledgeable of strains and various types of products offered by Mission;
- Properly setting up product displays pursuant to Mission policies and procedures;
- Executing and enforcing compliance with Commission regulations and Mission policies and procedures;
- Understanding sales transactions using BioTrackTHC;
- Understanding individual customer goals;
- Reconciling cash from sales transactions, sales reports, and other forms of task management daily; and
- Participating in ongoing education and professional development as required.

Agent Personnel Records

Personnel records for each agent will be maintained for at least twelve (12) months after termination of the agent's affiliation with Mission and will include, at a minimum, the following:

- All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
- Documentation of verification of references;

- The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
- Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
- Documentation of periodic performance evaluations;
- A record of any disciplinary action taken;
- Notice of completed responsible vendor and eight-hour related duty training;
- Results of initial background investigation, including CORI reports; and
- Documentation of all security related events (including violations) and the results of any investigations and description of remedial actions, restrictions, or additional training required as a result of an incident.

Personnel records will be kept in a secure location to maintain confidentiality and will only be accessible to the agent's manager or members of the executive management team.

Staffing Plan and Business Hours

Hiring and Recruitment

Mission's Human Resource Manager will engage the executive management team and management staff on a regular basis to determine if vacancies are anticipated and whether specific positions need to be created in response to company needs. Mission's personnel practices will comply with the following, which will apply to all types of employment situations, including, but not limited to, hiring, terminations, promotions, training, wages and benefits:

- State anti-discrimination statutes and Equal Employment Opportunity Commission (EEOC) requirements;
- Mission's Diversity Plan and Community Initiatives;
- Mission's Plan to Positively Impact Areas of Disproportionate Impact;
- Background Checks and References;
- Mandatory reporting of criminal convictions (and termination if necessary);
- State and Federal Family Leave Act;
- Workplace Safety Laws;
- Workers' Compensation;
- State and Federal Minimum Wage Requirements;
- Non-Disclosure and Non-Complete Agreements; and
- Any other applicable local, state, or federal employment laws, rules, or regulations.

Standards of Conduct

Mission is committed to maintaining an environment conducive to the health and well-being of customers and employees. It is Mission's mission to provide a professional workplace free from harassment and discrimination for employees. Mission will not tolerate harassment or discrimination on the basis of sex, race, color, national origin, age, religion, disability, sexual orientation, gender identity, gender expression, or any other trait or characteristic protected by any applicable federal, state, or local law or ordinance. Harassment or discrimination on the basis of any protected trait or characteristic is contrary to Mission's values and is a violation of the Company Code of Conduct. Harassment is a form of discrimination. There is a broad range of behavior that could constitute harassment. In general, harassment is any verbal or physical conduct that:

- Has the purpose or effect of creating an intimidating, hostile, or offensive working environment;
- Has the purpose or effect of unreasonably interfering with an individual's work performance; or
- Adversely affects an individual's employment opportunities.

Employees are expected to maintain the highest degree of professional behavior. Any harassment or discrimination by employees is strictly prohibited. Further, harassing or discriminatory behavior of non-employees directed at Mission employees or customers is also condemned and will be promptly addressed.

Violence and Weapons in the Workplace

Any and all acts of violence in the workplace will result in immediate dismissal of the employee, customer, or parties involved. Law enforcement will be contacted immediately in the case of a violent event. Weapons are not permitted to be brought on site by employees, customers, or other parties. Any employee found carrying a weapon on the premises of a Mission facility will be immediately terminated, and any customer found carrying a weapon on the premises will be asked to leave and/or the police will be notified accordingly.

At-Will Employment

In the state of Massachusetts, employment is assumed to be at-will unless otherwise stated. At-will employment implies that employer and employee alike may terminate the work relationship at any given moment and for any legitimate purpose. Wrongful termination may be more difficult to prove in an at-will arrangement because of the freedom that each party has to end the employment. However, there are still many instances wherein a termination or discharge can be called wrongful, even in an at-will employment.

Workplace Attire

The required attire for registered agents at Mission varies based upon required duties. New hire training and the onboarding process will go over the workplace attire specific to each role and the department manager will be responsible for ensuring compliance with all requirements is met.

Business Hours (Worcester and Brookline Retail)[1]

- Monday: 10:00 a.m. – 7:00 p.m.
- Tuesday: 10:00 a.m. – 7:00 p.m.
- Wednesday: 10:00 a.m. – 7:00 p.m.
- Thursday: 10:00 a.m. – 7:00 p.m.
- Friday: 10:00 a.m. – 7:00 p.m.
- Saturday: 10:00 a.m. – 7:00 p.m.
- Sunday: 10:00 a.m. – 7:00 p.m.

Business Hours (Cultivation and Product Manufacturing)

- Monday: 10:00 a.m. – 7:00 p.m.
- Tuesday: 10:00 a.m. – 7:00 p.m.
- Wednesday: 10:00 a.m. – 7:00 p.m.
- Thursday: 10:00 a.m. – 7:00 p.m.
- Friday: 10:00 a.m. – 7:00 p.m.
- Saturday: 10:00 a.m. – 7:00 p.m.
- Sunday: 10:00 a.m. – 7:00 p.m.

Overview of Personnel Policies and Procedures

Standard Employment Practices

Mission values the contributions of its management and staff positions. Mission will strive to be the industry leader in workplace satisfaction by offering highly competitive wage and benefits packages and developing a culture that values a proper work-life balance, boasts a transparent and accessible executive management team, and fosters a work ethic that focuses on the mission of the company and spirit of the adult-use marijuana program in Massachusetts.

Advancement

[1] *Hours above for Brookline retail are Mission's proposed hours; however, the final hours will be determined by the Select Board per the terms of the Community Host Agreement. Mission will notify the Commission of any changes made by the Select Board to Brookline's hours of operation.*

The organization will be structured in a relatively flat manner, with promotional opportunities within each department. Participation in training and bi-annual performance evaluations will be critical for any promotions or pay increases.

Written Policies

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

Investigations

Mission will set forth policies and procedures to investigate any complaints or concerns identified or raised internally or externally in order to stay in compliance with 935 CMR 500.000 et seq.

Designated Outside Counsel

Mission may retain counsel specializing in employment law to assist the Human Resources Manager with any issues and questions.

Job Status

Job Classifications

Positions at Mission are categorized by rank and by department. The executive management team oversees the overall success of mission of the company; the CEO is responsible for implementation of the mission and the executive management team as a whole is responsible for ensuring that all departments are properly executing their functions and responsibilities. Job classification is comprised of three rank tiers: Executive Management, Management, and Non-Management Employee.

Work Schedules

Work schedules will be either part-time, full-time, or salaried, depending of the specific position.

Schedules will be set according to the needs of each department as determined by the department manager and the executive manager they report to. It is the department manager's responsibility to develop and implement a work schedule that provides necessary duty and personnel coverage but does not exceed what is required for full implementation of operations. It is also the department manager's responsibility to ensure that adequate coverage occurs on a daily basis and does not lead to unnecessary utilization of overtime coverage.

Mandatory Meetings and Community Service Days

There will be a mandatory, reoccurring company-wide meeting on a quarterly basis. All personnel will be notified if their attendance is required. Certain personnel, such as housekeeping staff, may not be required to attend. Each department will have a mandatory weekly meeting scheduled by the department manager. The department managers will provide agendas for all meetings and will report to their executive manager.

Breaks

Daily breaks, including lunch breaks, will comply with the laws of the Commonwealth.

Performance Reviews

Performance reviews will be conducted by executive or department managers. Reviews will be conducted at three-month for new employees during the first year and annually thereafter. A written synopsis must be provided to, and signed by, the employee under review. Reviews must be retained in each employee's employment file. Performance reviews must take into account positive performance factors and areas requiring improvement. Scoring systems may be utilized to help reflect an employee's overall performance.

Leave Policies

Mission leave policies will comport with all state and federal statutes. All full-time employees will receive two 40-hour weeks of paid vacation per annum. Additional leave must be requested at least two weeks in advance and approved by the employee's department manager. Mission will determine which holidays will be observed and which departments will not be required to work. Mission will offer paid maternity leave. Additional leave will not be paid and must be approved by the department manager.

Mission anticipates observing the following holidays:

- New Year's Day;
- Martin Luther King Day;

- Presidents' Day;
- Memorial Day;
- Independence Day;
- Labor Day;
- Thanksgiving; and
- Christmas Day.

Disciplinary Policies Purpose

Mission's progressive discipline policies and procedures are designed to provide a structured corrective action process to improve and prevent a recurrence of undesirable behavior and/or performance issues. The steps outlined below of Mission's progressive discipline policies and procedures have been designed consistent with Mission's organizational values, best practices, and state and federal employment laws.

Mission reserves the right to combine or skip steps depending upon the facts of each situation and the nature of the offense. The level of disciplinary intervention may also vary. Some of the factors that will be considered are whether the offense is repeated despite coaching, counseling, and/or training; the employee's work record; and the impact the employee's performance, conduct and/or attendance issues have on Mission as an organization.

Procedure

Step 1: Counseling and Verbal Warning Step 1 creates an opportunity for the immediate supervisor to schedule a meeting with an employee to bring attention to the existing performance, conduct, or attendance issue. The supervisor should discuss with the employee the nature of the problem and/or violation of company policies and procedures. The supervisor is expected to clearly outline expectations and steps the employee must take to improve performance or resolve the problem.

Within five business days, the supervisor will prepare written documentation of a Step 1 meeting. The employee will be asked to sign the written documentation. The employee's signature is needed to demonstrate the employee's understanding of the issues and the corrective action needed.

Step 2: Written Warning While it is hoped that the performance, conduct, or attendance issues that were identified in Step 1 have been corrected, Mission recognizes that this may not always be the case. A written warning involves a more formal documentation of the performance, conduct, or attendance issues and consequences.

During Step 2, the immediate supervisor and a department manager or director will meet

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

Step 3: Suspension and Final Written Warning There may be performance, conduct, or safety incidents so problematic and harmful that the most effective action may be the temporary removal of the employee from the workplace. When immediate action is necessary to ensure the safety of the employee or others, the immediate supervisor may suspend the employee pending the results of an investigation.

Suspensions that are recommended as part of the normal progression of the progressive discipline policies and procedures are subject to approval from a next-level manager and the Human Resources Manager.

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

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

Step 4: Recommendation for Termination of Employment The last and most serious step in the progressive discipline procedures is a recommendation to terminate employment. Generally, Mission will try to utilize the progressive steps of this policy by first providing warnings, a final written warning, and/or suspension from the workplace before proceeding to a recommendation to terminate employment. However, Mission reserves the right to combine and skip steps depending upon the circumstances of each situation and the nature of the offense, and an employee may be terminated without prior notice or disciplinary action.

Management's recommendation to terminate employment must be approved by the Human Resources Manager and department manager or designee. Final approval may be required from the CEO or designee.

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

Appeal Process

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

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

Performance and Conduct Issues Not Subject to Progressive Discipline

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

Documentation

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

Separation of Employment

Separation of employment within an organization can occur for several different reasons. Employment may end as a result of resignation, retirement, release (end of season or assignment), reduction in workforce, or termination. When an employee separates from Mission, the employee's supervisor must contact the Human Resources Manager to schedule an

exit interview, which will typically take place on the employee's last workday.

Types of Separation

1. Resignation

Resignation is a voluntary act initiated by the employee to end employment with Mission. The employee must provide a minimum of two (2) weeks' notice prior to resignation. If an employee does not provide advance notice or fails to actually work the remaining two weeks, the employee will be ineligible for rehire. The resignation date must not fall on the day after a holiday.

2. Retirement

An employee who wishes to retire is required to notify their department director and the Human Resources Manager in writing at least one (1) month before planned retirement date. It is the practice of Mission to give special recognition to employees at the time of their retirement.

3. Job Abandonment

An employee who fails to report to work or contact their supervisor for two (2) consecutive workdays will be considered to have abandoned their job without notice effective at the end of the employee's normal shift on the second day. The department manager will notify the Human Resources Manager at the expiration of the second workday and initiate the paperwork to terminate the employee. Employees who are separated due to job abandonment are ineligible for rehire.

4. Termination

Employees of Mission are employed on an at-will basis, and the company retains the right to terminate an employee at any time.

5. Reduction in Workforce

An employee may be laid off due to changes in duties, organizational changes, lack of funds, or lack of work. Employees who are laid off may not appeal the layoff decision through the appeal process.

6. Release

Release is the end of temporary or seasonal employment. The Human Resources Manager, in consultation with the department manager, will inform the temporary or seasonal worker of their release according to the terms of the individual's temporary employment.

Exit Interview

The separating employee will contact the HR department as soon as notice is given to schedule an exit interview. The interview will be held on the employee's last day of work or another day, as mutually agreed upon.

Return of Property

The separating employee must return all company property at the time of separation, including but not limited to, uniforms, cell phones, keys, computers, and identification cards. Failure to return certain items may result in deductions from the employee's final paycheck. All separating employees will be required to sign a Wage Deduction Authorization Agreement, allowing Mission to deduct the costs of such items from their final paycheck.

Termination of Benefits

An employee separating from Mission is eligible to receive benefits as long as the appropriate procedures are followed as stated above. Two weeks' notice must be given, and the employee must work the full two work weeks. Accrued vacation leave will be paid in the last paycheck. Accrued sick leave will be paid in the last paycheck.

Health Insurance

Health insurance terminates on the last day of the month of employment, unless employee requests immediate termination of benefits. Information about the Consolidated Omnibus Budget Reconciliation Act (COBRA) continued health coverage will be provided. Employees will be required to pay their share of the dependent health and dental premiums through the end of the month.

Rehire

Former employees who left in good standing and were classified as eligible for rehire may be considered for reemployment. An application must be submitted to the Human Resources Manager, and the applicant must meet all minimum qualifications and requirements of the position, including any qualifying exam, when required.

Department managers must obtain approval from the Human Resources Manager or designee prior to rehiring a former employee. Rehired employees begin benefits just as any other new employee. Previous tenure will not be considered in calculating longevity, leave accruals, or any other benefits.

An applicant or employee who is terminated for violating policy or who resigned in lieu of termination from employment due to a policy violation will be ineligible for rehire.

Compensation As an employer, Mission believes that it is in the best interest of both the organization and Mission's employees to fairly compensate its workforce for the value of the work provided. It is Mission's intention to use a compensation system that will determine the current market value of a position based on the skills, knowledge, and behaviors required of a fully-competent incumbent. The system used for determining compensation will be objective and non-discriminatory in theory, application and practice. The company has determined that this can best be accomplished by using a professional compensation consultant, as needed, and a system recommended and approved by the executive management team.

Selection Criteria

1. The compensation system will price positions to market by using local, national, and industry specific survey data.
2. The market data will primarily include marijuana-related businesses and will include survey data for more specialized positions and will address significant market differences due to geographical location.
3. The system will evaluate external equity, which is the relative marketplace job worth of every marijuana industry job directly comparable to similar jobs at Mission, factored for general economic variances, and adjusted to reflect the local economic marketplace.
4. The system will evaluate internal equity, which is the relative worth of each job in the organization when comparing the required level of job competencies, formal training and experience, responsibility and accountability of one job to another, and arranging all jobs in a formal job-grading structure.
5. Professional support and consultation will be available to evaluate the compensation system and provide on-going assistance in the administration of the program.
6. The compensation system must be flexible enough to ensure that the company is able to recruit and retain a highly-qualified workforce, while providing the structure necessary to effectively manage the overall compensation program.

Responsibilities

The executive management team will give final approval for the compensation system that will be used by Mission.

1. On an annual basis the executive management team will review and approve, as appropriate, recommended changes to position-range movement as determined through the vendor's market analysis process.
2. As part of the annual budgeting process, the executive management team will review and approve, as appropriate, funds to be allocated for total compensation, which would include base salaries, bonuses, variable based or incentive-based pay, and all other related expenses, including benefit plans.

Management Responsibility

1. The CEO is charged with ensuring that Mission is staffed with highly-qualified, fully-competent employees and that all programs are administered within appropriate guidelines and within the approved budget.

2. The salary budget will include a gross figure for the following budget adjustments, but the individual determinations for each employee's salary adjustment will be the exclusive domain of the CEO: determining the appropriate head count, titles, position levels, merit and promotional increases and compensation consisting of salary, incentive, bonus, and other discretionary pay for all positions.

3. The CEO will ensure that salary ranges are updated at least annually, that all individual jobs are market priced at least once every two years, and that pay equity adjustments are administered in a fair and equitable manner.

<u>Agent Background Checks</u>

● In addition to completing the Commission's agent registration process, all agents hired to work for Mission will undergo a detailed background investigation prior to being granted access to a Mission facility or beginning work duties.

● Background checks will be conducted on all agents in their capacity as employees or volunteers for Mission pursuant to 935 CMR 500.100 and will be used by the Director of Security, who will be registered with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: iCORI Registration and the Commission for purposes of determining the suitability of individuals for registration as a marijuana establishment agent with the licensee.

● For purposes of determining suitability based on background checks performed in accordance with 935 CMR 500.101(1), Mission will consider:

a. All conditions, offenses, and violations are construed to include Massachusetts law or like or similar law(s) of another state, the United States or foreign jurisdiction, a military, territorial or Native American tribal authority, or any other jurisdiction.

b. All criminal disqualifying conditions, offenses, and violations include the crimes of attempt, accessory, conspiracy, and solicitation. Juvenile dispositions will not be considered as a factor for determining suitability.

c. Where applicable, all look back periods for criminal conditions, offenses, and violations included in 935 CMR 500.802 commence upon the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look back period will commence upon release from incarceration.

● Suitability determinations will be made in accordance with the procedures set forth in 935 CMR 500.800. In addition to the requirements established in 935 CMR 500.800, Mission will:

a. Comply with all guidance provided by the Commission and 935 CMR 500.802: Tables B through D to determine if the results of the background are grounds for Mandatory Disqualification or Presumptive Negative Suitability Determination.

b. Consider whether offense(s) or information that would result in a Presumptive Negative Suitability Determination under 935 CMR 500.802. In the event a Presumptive Negative Suitability Determination is made, Mission will consider the following factors:

i. Time since the offense or incident;
ii. Age of the subject at the time of the offense or incident;
iii. Nature and specific circumstances of the offense or incident;
iv. Sentence imposed and length, if any, of incarceration, if criminal;
v. Penalty or discipline imposed, including damages awarded, if civil or administrative;
vi. Relationship of offense or incident to nature of work to be performed;
vii. Number of offenses or incidents;
viii. Whether offenses or incidents were committed in association with dependence on drugs or alcohol from which the subject has since recovered;
ix. If criminal, any relevant evidence of rehabilitation or lack thereof, such as information about compliance with conditions of parole or probation, including orders of no contact with victims and witnesses, and the subject's conduct and experience since the time of the offense including, but not limited to, professional or educational certifications obtained; and
x. Any other relevant information, including information submitted by the subject.

c. Consider appeals of determinations of unsuitability based on claims of erroneous information received as part of the background check during the application process in accordance with 803 CMR 2.17: Requirement to Maintain a Secondary Dissemination Log and 2.18: Adverse Employment Decision Based on CORI or Other Types of Criminal History Information Received from a Source Other than the DCJIS.

● Upon adverse determination, Mission will provide the applicant a copy of their background screening report and a pre-adverse determination letter providing the applicant with a copy of their right to dispute the contents of the report, who to contact to do so and the opportunity to provide a supplemental statement.

○ After 10 business days, if the applicant is not disputing the contents of the report and any provided statement does not alter the suitability determination, an adverse action letter will be issued providing the applicant information on the final determination made by Mission along with any legal notices required.

● All suitability determinations will be documented in compliance with all requirements set

forth in 935 CMR 500 et seq. and guidance provided by the Commission.

● Background screening will be conducted by an investigative firm holding the National Association of Professional Background Screeners (NAPBS®) Background Screening Credentialing Council (BSCC) accreditation and capable of performing the searches required by the regulations and guidance provided by the Commission.

● References provided by the agent will be verified at the time of hire.

● As deemed necessary, individuals in key positions with unique and sensitive access (e.g. members of the executive management team) will undergo additional screening, which may include interviews with prior employers or colleagues.

● As a condition of their continued employment, agents, volunteers, contractors, and subcontractors are required to renew their Program ID cards annually and submit to other background screening as may be required by Mission or the Commission.

QUALITY CONTROL AND TESTING

Mission MA, Inc. ("Mission") will comply with the following sanitary requirements:

1. Any Mission agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000, and all edible marijuana products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 500.000, and with the requirements for food handlers specified in 105 CMR 300.000.

2. Any Mission agent working in direct contact with preparation of marijuana or nonedible marijuana products will conform to sanitary practices while on duty, including:

a. Maintaining adequate personal cleanliness;

b. Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated; and

c. Always wearing new disposable gloves when in direct contact with marijuana or marijuana products.

3. Mission's hand-washing facilities will be adequate and convenient and will be furnished with running water at a suitable temperature. Hand-washing facilities will be located in Mission's production areas and where good sanitary practices require employees to wash and sanitize their hands, and will provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;

4. Mission's facility will have sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;

5. Mission will ensure that litter and waste is properly removed and disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal will be maintained in an adequate manner pursuant to 935 CMR 500.105(12);

6. Mission's floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair;

7. Mission's facility will have adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;

8. Mission's buildings, fixtures, and other physical facilities will be maintained in a sanitary condition;

9. Mission will ensure that all contact surfaces, including utensils and equipment, will be maintained in a clean and sanitary condition. Such surfaces 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. Equipment and utensils will be so designed and of such material and workmanship as to be adequately cleanable;

10. All toxic items will be identified, held, and stored in a manner that protects against contamination of marijuana products;

11. Mission will ensure that its water supply is sufficient for necessary operations, and that such water supply is safe and potable;

12. Mission's plumbing will be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the marijuana establishment. Plumbing will properly convey sewage and liquid disposable waste from the marijuana establishment. There will be no cross-connections between the potable and waste water lines;

13. Mission will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;

14. Mission will hold all products that can support the rapid growth of undesirable microorganisms in a manner that prevents the growth of these microorganisms; and

15. Mission will store and transport finished products under conditions that will protect them against physical, chemical, and microbial contamination, as well as against deterioration of finished products or their containers.

Mission's vehicles and transportation equipment used in the transportation of marijuana products or edibles requiring temperature control for safety will be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the marijuana products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c).

Mission will ensure that Mission's facility is always maintained in a sanitary fashion and will comply with all applicable sanitary requirements.

Mission will follow established policies and procedures for handling voluntary and mandatory recalls of marijuana products. Such procedures are sufficient to deal with recalls due to any action initiated at the request or order of the Commission, and any voluntary action by Mission to remove defective or potentially defective marijuana products from the market, as well as any action undertaken to promote public health and safety.

Any inventory that becomes outdated, spoiled, damaged, deteriorated, mislabeled, or contaminated will be disposed of in accordance with the provisions of 935 CMR 500.105(12), and any such waste will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations.

Mission will process marijuana in a safe and sanitary manner. Mission will process the leaves and flowers of the female marijuana plant only, which will be:

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

All edible products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: Minimum Sanitation Standards for Food Establishments.

Testing Mission will not sell or otherwise market marijuana or marijuana products that are not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. No marijuana product will be sold or otherwise marketed for adult use that has not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160. Testing of Mission's marijuana products will be performed by an Independent Testing Laboratory in compliance with the Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products, as amended in November 2016, published by the DPH. Testing of Mission's environmental media will be performed in compliance with the Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries published by the DPH.

Mission's policy of responding to laboratory results that indicate contaminant levels are above acceptable limits established in the DPH protocols identified in 935 CMR 500.160(1) include notifying the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch. Such notification will describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

Mission will maintain testing results in compliance with 935 CMR 500.000 *et seq.* and the record keeping policies described herein and will maintain the results of all testing for no less than one year.

All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services will comply with 935 CMR 500.105(13). All storage of Mission's marijuana at a laboratory providing marijuana testing services will comply with 935 CMR 500.105(11). All excess marijuana will be disposed in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to Mission for disposal or by the Independent Testing Laboratory disposing of it directly.

DIVERSITY PLAN

Mission MA, Inc. (“Mission”) believes in creating and sustaining a robust policy of inclusivity and diversity. Mission recognizes that diversity in the workforce is key to the integrity of a company’s commitment to its community. Mission is dedicated to creating a diverse culture with a commitment to equal employment opportunity for all individuals. Mission’s diversity plan is designed to promote equity among minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientations. Mission will make every effort to employ and advance in employment qualified and diverse people at all levels within the company.

Mission’s executives and leadership are committed to successful implementation of Mission’s Diversity Plan. Mission’s executive management team believes that increased diversity will provide Mission with a richer perspective and approach to its business. Mission also wants to ensure that its customers see themselves in the makeup of Mission’s employees.

Goals

Mission’s comprehensive diversity empowerment plan is a pillar of its purpose-driven company. To better serve Mission’s customers, Mission aims to create an environment where personal identities, race, military service, sexual orientation, and heritage are utilized, celebrated, and valued. Mission’s diversity initiatives and strategies are designed to attract, develop, and advance the most talented individuals regardless of their race, sexual orientation, religion, age, gender, disability status, or any other dimension of diversity.

It is Mission’s goal to increase the number of minorities; women; veterans; persons with disabilities; and people of all gender identities and sexual orientations working in the establishment and providing tools to ensure their success.

The Program

Mission’s diversity program includes the Diversity Recruitment and Sourcing and Employee Retention, Training, and Development sections below.

Diversity Recruitment and Sourcing

Mission will establish and maintain an inclusive and diverse workforce to serve its

customers through innovative corporate recruitment of underrepresented and minority communities. Mission will develop strategic corporate initiatives to ensure a diverse and qualified staff stands ready to serve Mission customers' needs. These strategic corporate initiatives may include, but are not limited to:

- Participating in career fairs in underrepresented and minority communities, particularly those in commuting proximity to Worcester and Brookline at least twice per year in each location
- Providing cultural training on cultural sensitivity and recognizing unconscious bias at least once per year in each location; and
- Using suppliers who are also committed to diversity and inclusion.

Mission's recruitment efforts are designed to maintain a steady flow of qualified diverse applicants, and may include taking the following steps:

- Developing relationships with organizations serving minorities, women, people of all gender identities and sexual orientations, veterans, and persons with disabilities for employment referrals;
- Providing briefings to representatives from recruitment sources concerning current and future job openings;
- Encouraging employees from diverse groups to refer applicants for employment;
- Participating in local career day programs and encouraging Mission's diverse employees to participate whenever possible;
- Establishing recruitment efforts at higher learning institutions, and institutions with special programs that reach diverse people;
- Developing relationships with community child care, housing, transportation, and other programs designed to improve employment opportunities for diverse persons;
- Ensuring that job openings are sent to community partners; and
- Utilizing Zip Recruiter to reach over 100 online career and job websites, as well as social media.

Employee Retention, Training, and Development

Mission will offer opportunities for promotions, career counseling, and training to all employees in order to promote growth and minimize turnover. Mission will ensure that all employees are given equal opportunities for professional development by communicating promotion opportunities and training programs, and by creating clearly-defined job descriptions. Mission will ensure that all employees receive career counseling, including counseling related to advancement opportunities and training programs that can assist them in career development. Mission will instruct managers and supervisors to refer employees seeking career counseling to the Human Resources Manager.

Mission's diversity awareness training emphasizes Mission's commitment to its zero-tolerance harassment and discrimination policy. Mission will strictly adhere to and enforce the policy by taking corrective action should any issues, concerns, or complaints arise. All Mission employees will be required to complete the diversity awareness training program during employee orientation. Training will begin upon hiring, and all new employees will be required to participate in an orientation program that will introduce and stress the importance of the Diversity Plan.

Upon completion of the orientation program, new hires will be equipped to describe, discuss, and implement the Diversity Plan. Following successful completion of the general orientation program, employees will undergo additional diversity training that will be tailored to the employee's specific job function. All employees will also be required to undergo ongoing diversity training to ensure knowledge of newly determined best practices and policies and continued familiarity and compliance with the Diversity Plan.

Awareness of Diversity Plan goals and Mission's efforts to create an open culture with zero tolerance for discrimination, harassment, or retaliation, is crucial to Mission's success. Management, staff, associates, vendors, contractors, and the general public all benefit from being informed of the Diversity Plan objectives and procedures. Information related to the Diversity Plan will be disseminated a variety of ways, which may include, but are not limited to:

- Inclusion of Mission's Equal Employment Opportunity and Reasonable Accommodation statement in the Employee Handbook;
- Inclusion of Mission's zero-tolerance policies for harassment, discrimination, bullying, and other actions which oppose Mission's goal for a diverse workforce, in the Employee Handbook;
- Postings in suitable areas for employee communication;
- Diversity training programs for all employees;
- Quarterly progress evaluation meetings with appropriate personnel; and
- Formal presentations made to management and employees on diversity initiatives.

Strategic Partnerships, Suppliers and Vendors

Mission will promote diversity and support the local economy by making efforts to purchase goods and services from vendors, contractors, and professional service providers that are owned and operated by individuals that have cultural and ethnically diverse characteristics. In selecting potential contractors, subcontractors, vendors and suppliers, Mission will first attempt to contract with small and diverse businesses. Mission's goal is to maintain diverse organization, vendor, and contractor spending. At

the end of the first year of operation, Mission will evaluate the percentage of spending conducted with qualifying organizations and set achievable but challenging goals to increase the percentage of spending in future years.

External communication efforts that align with Mission's Diversity Plan will include:

- Advertising in employment and business sections of appropriate types of media;
- Participating in employment and business notification programs; and
- Distribution of literature to organizations actively supportive of minorities, women, disabled persons, the LGBTQ community, and veterans.

Measuring Progress

Mission will establish a Diversity Committee (the "Committee") to assist the executive management team with the implementation and growth of the Diversity Plan. The initial members of the Committee will be selected based on their diverse status and their personal commitments to diversity. Additional members of the Committee may be added at the discretion of Mission's executive management team. The Committee will meet at least twice per year and will be responsible for:

- Reviewing the effectiveness of each career fair towards meeting the goals of the diversity plan to determine what, if any, corrective measures need to be taken any corrective actions need to be made Mission's future particpation in career fairs. The review shall consider the following:
    - Number of individuals from the above-referenced demographic groups who were hired and retained after the issuance of a license;
    - Number of promotions for people falling into the above-listed demographics since initial licensure;
    - Number of positions created since initial licensure;
- Assessing whether cultural sensitivity trainings have been effective in promoting the goals of Mission's Diversity Plan and determine what, if any, corrective actions need to be made for future trainings;
- Developing Equal Employment Opportunity (EEO) statements, policies, programs, and internal and external communication procedures in support of the goals of the Diversity Plan;
- Assisting in the identification of problematic areas for EEO, including receiving, reviewing, and resolving any complaints of discrimination or other non-compliance with regards to equal opportunity and fair treatment of all employees;
- Assisting management in arriving at effective solutions to problems regarding issues of diversity and inclusion;
- Designing and implementing internal reporting systems that measure the effectiveness of programs designed to support a company culture that fosters

diversity;
- Keeping the company informed of equal opportunity progress;
- Reviewing the Diversity Plan with management at all levels of Mission to ensure that the Diversity Plan is understood; and
- Auditing Mission's internal and external job postings to ensure information is in compliance with Mission's diversity policies and procedures.

The Human Resource Manager at Mission will be responsible for auditing the Diversity Plan. The audit report, which will analyze the Company's performance in fulfilling the goals of the Diversity Plan, may contain such information as:

- Employment data, including information on minority, women, disabled, and veteran representation in the workforce in all job classifications; average salary ranges; recruitment and training information (all job categories); and retention and outreach efforts;
- The total number and value of all contracts and/or subcontractors awarded for goods and services;
- An identification of each subcontract actually awarded to a member of a diverse group and the actual value of such subcontract;
- A comprehensive description of all efforts made by Mission to monitor and enforce the Diversity Plan;
- Information on diverse group investment, equity ownership, and other ownership or employment opportunities initiated or promoted by Mission;
- Other information deemed necessary or desirable by the Commission to ensure compliance with the rules and regulations governing marijuana establishments in Massachusetts; and
- When available, a workforce utilization report including the following information for each job category at Mission:
    - The total number of persons employed;
    - The total number of men employed;
    - The total number of women employed;
    - The total number of veterans employed;
    - The total number of service-disabled veterans employed; and
    - The total number of members of each racial minority employed.

Acknowledgements

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