

Diversity Plan

It is the policy of 1620 Labs to ensure that our Diversity Plan will promote equity, ensuring everyone is treated the same. Our diversity plan and goal are to empower our employees by respecting and appreciating what makes them different, in terms of gender, ethnicity, disability, sexual orientation/identification of veteran status. Our diversity plan allows for the exploration of these differences in a safe, nurturing and positive environment.

The purpose of this policy is to outline the responsibilities of the Company, the Company's management team and Agents to ensure that 1620 Labs is a diverse and inclusive company that promotes a discrimination-free and equitable work environment providing opportunities for all employees to use their diverse talents to support the company's mission.

1620 Labs, LLC will comply with the requirements of 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 1620 Labs will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

Goals:

1620 Labs is committed to achieving the following goals through this plan:

1. Our goal at 1620 Labs is to create a workplace and management team that will be as diverse as possible. Our goal will be focused to attract and retain qualified employees who are 1) Minorities, 2) Women, 3) Veterans, 4) People with disabilities; and 5) Individuals who are LBGTQ and/or identify as a non-normative sexual identity.
We aim to have 50% of our workforce female and 25% will be a combination of minorities, veterans, people with disabilities, and Individuals who are LBGTQ and/or identify as a non-normative sexual identity.
2. Make the 1620 Labs workplace a safe, accepting, respectful, welcoming, comfortable and supportive place to work.
We aim to have an 85% retention rate and a 95% positive job satisfaction rating from all employees as it pertains to workplace inclusion, safety and environment.
3. 1620 Labs, LLC also will include our suppliers and wholesale partners into our diversity plan by making every effort to engage with businesses owned by or whose employees are a majority of minorities, women, veterans, persons with disabilities and individuals who are LBGTQ and/or identify as a non-normative sexual identity.
It is our goal to have 20% of our suppliers, contractors and industry wholesale partners meet the criteria above.

Programs for Achieving Goals:

1. Recruitment and Hiring Program:

Recruitment and hiring preference will be offered to individuals who meet the criteria that we have outlined in our goals.

- a. We will post our employment opportunities at the MassHire North Central Career Center and MassHire Franklin Hampshire Career Center – Greenfield.
- b. We will promote our hiring preference on our own website, recruitment websites and on our social media presence such as Twitter, Instagram, LinkedIn, Leafly and other appropriate sites.
- c. 1620 Labs will participate in job fairs and any workshops available at the MassHire Career Centers
 - i. We will hold our first job fair 90 days after receiving our provisional license from the Commission.
 - ii. We will hold our second and subsequent job fairs on an as needed basis.

- d. All of 1620's employees that work at least 30 hours per week, (130 hours per month) will receive vacation and sick time benefits as well as access to a healthcare plan as it becomes available.
- e. We will institute a "blind hiring" policy in which the personal information of the candidate from the hiring manager that can lead to unconscious (or conscious) bias about the candidate.
- f. We will use job descriptions that are catered to and appeal to diverse candidates. All of our job postings will clearly promote our hiring priorities and encourage candidates who fall into our plan to apply.
- g. Our Human Resources staff will receive training annually and our hiring managers will receive training upon being hired and annually thereafter (from date of hire).
 - i. The training will be provided by our Human Resources staff and/or will be offered through online classes; such as: Gender Equality and Sexual Diversity <https://www.udemy.com/course/gender-equality-and-sexual-diversity/> and Diversity and inclusion in the workplace <https://www.coursera.org/learn/diversity-inclusion-workplace>

2. Inclusion and Retention Program:

1620 Labs is determined to provide a work environment that is a diverse and inclusive workplace. We encourage a broad range of opinions, ideas and perspectives that drives creativity, innovation and excellence. Our goal, which must be met, is to ensure that every employee, contractor and visitor feels safe, respected, welcome, comfortable, supported and accepted. To ensure inclusion in our workplace 1620 Labs will;

- a. Provide training to all employees regarding inclusion in the workplace including advanced training to managers. The training will be provided by our Human Resources staff and/or will be offered through online classes; such as: Addressing Unconscious Bias with Modern Learning <https://www.grovo.com/addressing-unconscious-bias>, Diversity and inclusion in the workplace <https://www.coursera.org/learn/diversity-inclusion-workplace>, and Understanding Diversity and Inclusion <https://www.futurelearn.com/courses/diversity-inclusion-awareness>.
 - i. This training will take place during onboarding and annually thereafter.
- b. Draft and implement a Non-Discrimination, Harassment and Retaliation Policy. This policy will include provisions for responding to complaints, discipline for non-compliance and evaluation of the circumstances to see if this plan needs improvements.
- c. Annually, 1620 Labs will provide all employees with a survey which will include a section where the employee will rate the inclusivity, safety and workplace environment in our company. The survey will include feedback from employees on these areas and the training they receive.
- d. Conduct exit interviews with all exiting employees to determine their reason for leaving 1620 Labs and requesting feedback inclusivity, safety and workplace environment

3. Supplier Diversity Program:

1620 Labs is committed to utilizing, to the extent possible, businesses owned by or whose employees are a majority of minorities, women, veterans, persons with disabilities and individuals who are LGBTQ and/or identify as a non-normative sexual identity. 1620 Labs recognizes that sourcing products and services from previously under-used suppliers helps to sustain and progressively transform a company's supply chain, thus quantitatively reflecting the demographics of the community in which it operates by recording transactions with diverse suppliers.

1620 Labs will actively identify and pursue partnerships with suppliers, contractors and Marijuana Establishments who meet the Plan Populations that are outlined above.

- a. 1620 Labs will give preference to suppliers and contractors whose owners or employees meet the criteria outlined above.
- b. 1620 Labs will actively recruit these individuals or companies and promote this Program when sourcing these services.

- i. As part of any bid or solicitation for services, 1620 Labs will request demographic information from the business or individual in order to see if they meet the Program Populations outlined above.
 - ii. When requesting bids from suppliers and contractors we will expressly promote the Supplier Contractor priority outlined in this plan.
- c. We will give priority to Marijuana Establishments whose owners or a majority of its employees meet the above criteria when entering into wholesale agreements.
 - i. We will promote this priority preference on our website and through direct email marketing to all Marijuana Retailers as well as through social media sites that target the Massachusetts Cannabis industry such as Twitter, Instagram, LinkedIn, Leafly and other appropriate media.

Evaluation:

1620 Labs realized that any plan needs to be evaluated once it is implemented. We will perform an ongoing and comprehensive evaluation of this plan to ensure that it accomplishes our 3 goals.

1. As we begin to recruit and hire potential employees the management team will evaluate the applicant pool and application to ensure that our recruitment policies are generating a diverse representation.
2. Periodically, the 1620 Labs management team will evaluate the workplace climate through observations, employee meetings and individual conversations with individual employees to ensure our workplace is a place of inclusion
3. Quarterly, the 1620 Labs management team will conduct a comprehensive evaluation of this plan that includes feedback from employees and stake holders as to the effectiveness of the policy and to see if our goals are attained.
4. If, at any time, it is found that the plan is not reaching our goals the executive management team will convene a special working group to evaluate the plan and make the necessary changes. This group may include outside consultants and professionals.

Plan Measurement:

The success of the company's Diversity Plan will be measured annually against the following metrics when applicable, at a minimum these include:

1. Representation: Percentage of employees from diverse populations compared with company, labor market or industry benchmarks.
2. Retention: Comparing average tenure for employees from diverse populations to average tenure across the workforce or average tenure of members of the dominant group.
3. Recruitment: Comparing the number of applicants for open positions from diverse populations against the potential pool of applicants from diverse populations or labor market representation.
4. Selection: Tracking appointments of individuals from diverse populations compared with appointments of applicants who are not members of a monitored group.
5. Promotion: Tracking promotions awarded to individuals from diverse populations compared with promotions awarded to individuals who are not members of a monitored group.
6. Development: Tracking lateral moves, appointments to acting roles, training and other learning and development participation, and other stretch assignment opportunities by identity group.
7. Pay and benefits: Compare financial and non-financial rewards earned by individuals from diverse populations to financial and non-financial rewards earned by individuals who are not members of a monitored group.
8. Training: Tracking of all employee and management training on diversity, inclusion and diversity hiring.
9. Employee engagement: Compare employee engagement scores for individuals from diverse populations with scores reported by individuals who are not members of a diverse population.
10. Job satisfaction data derived from annual surveys and exit interviews.

11. Supplier Engagement: The demographics, numbers, amounts and percentages of all third-party suppliers, contractors and Marijuana Industry Partners that 1620 Labs has engaged with and done business with;

Reporting:

1620 will perform an ongoing and comprehensive evaluation of this plan to ensure that it accomplishes our three (3) goals. We will produce a full report annually which outlines this plan, data collected, whether the goals have been met and if any changes are necessary. Quarterly, the 1620 management team will meet to discuss the report and make any necessary adjustments.

60 days prior to our license renewal, and annually thereafter, 1620 Labs will produce a comprehensive report on this Plan and its Goals and Programs which will outline the metrics for each program and whether we have met our goals. This report will be made available to the Commission.