Massachusetts Cannabis Control Commission

Marijuana Product Manufacturer

General Information:

License Number: MP281848

Original Issued Date: 08/14/2020

Issued Date: 08/14/2020

Expiration Date: 08/14/2021

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Green Theory Cultivation, LLC

Phone Number: 478-231-6282 **Email Address:** harsh@greentheory.farm

Business Address 1: 845 Pleasant St **Business Address 2:**

Business City: Lee **Business State:** MA **Business Zip Code:** 01238

Mailing Address 1: 41 Pine Ridge Rd **Mailing Address 2:**

Mailing City: Eastman **Mailing State:** GA **Mailing Zip Code:** 31023

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Minority-Owned Business

PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

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

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 25 **Percentage Of Control:** 25

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

First Name: Harsh **Last Name:** Patel **Suffix:**

Gender: Male **User Defined Gender:**

What is this person's race or ethnicity?: Asian (Chinese, Filipino, Asian Indian, Vietnamese, Korean, Japanese)

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 37.5 **Percentage Of Control:** 37.5

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

First Name: Milan **Last Name:** Sheth **Suffix:**

Gender: Female **User Defined Gender:**

What is this person's race or ethnicity?: Asian (Chinese, Filipino, Asian Indian, Vietnamese, Korean, Japanese)

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 3

Percentage Of Ownership: 37.5 **Percentage Of Control:** 37.5

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

First Name: Upeshkumar **Last Name:** Patel **Suffix:**

Gender: Male **User Defined Gender:**

What is this person's race or ethnicity?: Asian (Chinese, Filipino, Asian Indian, Vietnamese, Korean, Japanese)

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: Milan **Last Name:** Sheth **Suffix:**

Types of Capital: Monetary/Equity **Other Type of Capital:** **Total Value of the Capital Provided:** $500000 **Percentage of Initial Capital:** 50

Capital Attestation: Yes

Individual Contributing Capital 2

First Name: Upesh **Last Name:** Patel **Suffix:**

Types of Capital: Monetary/Equity **Other Type of Capital:** **Total Value of the Capital Provided:** $500000 **Percentage of Initial Capital:** 50

Capital Attestation: Yes

Individual Contributing Capital 3

First Name: Vidya **Last Name:** Patel **Suffix:**

Types of Capital: Monetary/Equity **Other Type of Capital:** **Total Value of the Capital Provided:** $500000 **Percentage of Initial Capital:** 50

Capital Attestation: Yes

Individual Contributing Capital 4

First Name: Amit **Last Name:** Sheth **Suffix:**

Types of Capital: Monetary/Equity **Other Type of Capital:** **Total Value of the Capital Provided:** $500000 **Percentage of Initial Capital:** 50

Capital Attestation: Yes

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS
No records found

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 845 Pleasant Street

Establishment Address 2:

Establishment City: Lee **Establishment Zip Code:** 01238

Approximate square footage of the Establishment: 18000 **How many abutters does this property have?:** 11

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

HOST COMMUNITY INFORMATION
Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	Green Theory-HCA Cert. Form.pdf	pdf	5e581d8602a6e7045352fb6d	02/27/2020
Plan to Remain Compliant with Local Zoning	GTC Plan to Remain Compliant with Local Zoning_.pdf	pdf	5e5ab225fd7e6446b62a38e9	02/29/2020
Community Outreach Meeting Documentation	GTC COM Packet (Compiled&Annotated).pdf	pdf	5e9088e55f1da0353e2b4489	04/10/2020

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

PLAN FOR POSITIVE IMPACT
Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	GTC Plan for Positive Impact_V2.1.pdf	pdf	5eb0b8868caba634a843803f	05/04/2020

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION
Individual Background Information 1

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

First Name: Harsh **Last Name:** Patel **Suffix:**

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 2

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

First Name: Milan **Last Name:** Sheth **Suffix:**

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 3

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

First Name: Upeshkumar **Last Name:** Patel **Suffix:**

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 4

Role: Other (specify) **Other Role:** Spouse of owner

First Name: Vidya **Last Name:** Patel **Suffix:**

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 5

Role: Other (specify) **Other Role:** Spouse of owner

First Name: Amit **Last Name:** Sheth **Suffix:**

RMD Association: Not associated with an RMD

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	COGS Corp GTC.pdf	pdf	5e581e9c813339048c3ff9cd	02/27/2020
Articles of Organization	GTC Articles.pdf	pdf	5e581ed0d29b0704447da685	02/27/2020
Department of Revenue - Certificate of Good standing	Certificate of Good Standing _ MassTax.pdf	pdf	5e5d028c5a27c34431d17aea	03/02/2020
Department of Revenue - Certificate of Good standing	DUA Good Standing GTC.pdf	pdf	5e5d02a8c51b0d43fad1c282	03/02/2020
Bylaws	Operating Agreement _ Green Theory Cultivation LLC (Sign).pdf	pdf	5e5d02d4c51b0d43fad1c286	03/02/2020

No documents uploaded

Massachusetts Business Identification Number: 001378969

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Proposed Timeline	GTC Timeline for PM.pdf	pdf	5e588c87d29b0704447da805	02/27/2020
Plan for Liability Insurance	Liability Insurance Plan.pdf	pdf	5e588c95fe55e40432f73806	02/27/2020

Business Plan	GTC THREE YEAR BUSINESS PLAN PROJECTION.pdf	pdf	5e5d0379c51b0d43fad1c28e	03/02/2020

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Sample of unique identifying marks used for branding	GTC Samples of unique identifying marks used for branding.pdf	pdf	5e588cd15a2369047f228bb0	02/27/2020
Separating recreational from medical operations, if applicable	GTC Policy for Separating Recreational from Medical Operations.pdf	pdf	5e588ce64fa2b004756a4bd0	02/27/2020
Security plan	GTC Security Plan.pdf	pdf	5e588d07d43df3043d4bc153	02/27/2020
Prevention of diversion	GTC Prevention of Diversion SOP.pdf	pdf	5e588d191c3b1d04a32b55c5	02/27/2020
Storage of marijuana	GTC Storage SOP.pdf	pdf	5e588d297b9883042b375150	02/27/2020
Quality control and testing	GTC Quality Control and Product Testing.pdf	pdf	5e588d5681ae16046becc0e9	02/27/2020
Personnel policies including background checks	GTC Personnel Policies.pdf	pdf	5e588d7a7b9883042b375154	02/27/2020
Record Keeping procedures	GTC Record Keeping Procedure .pdf	pdf	5e588d8b69dc9d0456dbbe05	02/27/2020
Maintaining of financial records	GTC Maintenance of Financial Records Policy and Procedure .pdf	pdf	5e588da7813339048c3ffb9d	02/27/2020
Qualifications and training	GTC Qualifications and Training Policy and Procedure.pdf	pdf	5e588dbf02a6e7045352fd20	02/27/2020
Transportation of marijuana	GTC Transportation of Marijuana SOP.pdf	pdf	5e588f4202a6e7045352fd2a	02/27/2020
Restricting Access to age 21 and older	GTC Cultivation_Policy for Limiting Access to Age 21 and Older.pdf	pdf	5e588fa502a6e7045352fd2e	02/27/2020
Dispensing procedures	GTC Policy for Dispensing.pdf	pdf	5e5891684fa2b004756a4be6	02/27/2020
Inventory procedures	GTC Inventory of Marijuana.pdf	pdf	5e58917dd29b0704447da817	02/27/2020
Diversity plan	GTC Diversity Plan.pdf	pdf	5e5abf1e73b705467fec885a	02/29/2020
Dispensing procedures	GTC Plan to obtain marijuana.pdf	pdf	5e907d80b7c619391b8bad6c	04/10/2020
Method used to produce products	GTC Methods Used to Produce Products_V2.0.pdf	pdf	5e907d97b014bf38e46cf3d9	04/10/2020
Security plan	GTC Safety Plan.pdf	pdf	5e907da02eba6d38ef1669d8	04/10/2020
Types of products Manufactured.	GTC Products to be Manufactured_V2.1.pdf	pdf	5eb0b8b47dc04134928154fb	05/04/2020

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

PRODUCT MANUFACTURER SPECIFIC REQUIREMENTS

No records found

HOURS OF OPERATION

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

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, Harsh Patel, (*insert name*) certify as an authorized representative of Green Theory Cultivation (*insert name of applicant*) that the applicant has executed a host community agreement with The Town of Lee (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on February 4, 2020 (*insert date*).

Signature of Authorized Representative of Applicant

Host Community

I, Thomas P.Wickham, (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for Town of Lee (*insert name of host community*) to certify that the applicant and Town of Lee (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on February 4, 2020 (*insert date*).

Signature of Contracting Authority or
Authorized Representative of Host Community

COMMONWEALTH OF MASSACHUSETTS

Berkshire, ss

On this 4th day of February, 2020, before me, the undersigned Notary Public, personally appeared the above-named Thomas P. Wickham, proved to me by satisfactory evidence of identification, being (check whichever applies): ❑ driver's license or other state or federal governmental document bearing a photographic image, ❑ oath or affirmation of a credible witness known to me who knows the above signatory, or ☒ my own personal knowledge of the identity of the signatory, to be the person whose name is signed above, and acknowledged the foregoing to be signed by him voluntarily for its stated purpose, as the duly authorized contracting authority.

JOHN W. GRAZIANO
MY COMMISSION EXPIRES DEC. 18, 2026
NOTARY PUBLIC
COMMONWEALTH OF MASSACHUSETTS

Notary Public

My commission expires _____.

Plan to Remain Compliant with Local Zoning

The purpose of this plan is to outline how Green Theory Cultivation, LLC. will remain in compliance with local codes, ordinances, and bylaws for the physical address of our Marijuana Establishment at 845 Pleasant Street in Lee these include, but not be limited to, the identification of any local licensing requirements for the adult use of marijuana

Background

The Town of Lee has an enacted a zoning bylaw regulating the time place and manner of Marijuana Establishments. This bylaw, Section 199-9.11 allows Marijuana Cultivation and Product Manufacturing Facilities in the Industrial zoning district upon the approval of a Site Plan and Special Permit, in accordance with §199-13.3 and §199-13.4 of the Zoning Bylaw. 845 Pleasant Street is located in the Industrial Zoning Distric and is compliant with all physical siting requirements outlined in the Bylaw. Green Theory Cultivation has applied for and received our Special Permit and Site Plan approval from the Select Board. The special permit will expire in one year if a substantial use or construction has not begun under the permit by such date, except for a good cause. There are no local licensing requirements.

Green Theory Cultivation, LLC. and its attorneys and consultants have reviewed this ordinance in its entirety and have developed plans and strategies on compliance with all of the requirements and special permit conditions.

Lee does not have any local licensing requirements for Marijuana Establishments.

Ongoing Compliance

Green Theory Cultivation is committed to remaining in compliance with all with local codes, ordinances, and bylaws. Our attorney and compliance consultant will make periodic assessments of our operation for compliance with all applicable local, state and federal laws and regulations, including zoning and special permit compliance.

Our Team is in regular contact with and will remain in contact with the Lee Town officials to ensure that there is an open line of communications. We will remain up to date with all zoning bylaw changes and requirements to ensure that Green Theory Cultivation, LLC. remains in compliance.

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, James McMahon, (*insert name*) attest as an authorized representative of Green Theory Cultivation, LLC (*insert name of applicant*) that the applicant has complied with the requirements of 935 CMR 500 and the guidance for licensed applicants on community outreach, as detailed below.

1. The Community Outreach Meeting was held on 1/7/2020 (*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 12/24/2019 (*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 12/23/19 (*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 12/23/19 (*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*).

Initials of Attester: DS JM

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

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.

James McMahon <james@mcmahonstrategic.com>

Public Notice request

NENI Notices <neninotices@berkshireeagle.com> Fri, Dec 20, 2019 at 11:57 AM
To: James McMahon <james@mcmahonstrategic.com>

James

Thank you for your payment.
I will email you the PDF of the tear sheet on Tuesday.

Nancy

Advertising Receipt

JAMES MCMAHON
46 APPLETON STREET
BOSTON, MA 02116

Cust#:216527
Ad#:45507
Phone#:203.520.8555
Date:12/20/2019

Salesperson: NANCY MCLEAN **Classification: Public Notices BE** **Ad Size: 1.0 x 14.00**

Advertisement Information:

Description	Start	Stop	Ins.	Cost/Day	Total
Berkshire Eagle	12/24/2019	12/24/2019	1	49.70	49.70

Payment Information:

Date:	Order#	Type
12/20/2019	45507	CreditCard

DS JM

Total Amount:	**49.70**
Tax:	**0.00**
Total Payments:	**49.70**
Amount Due:	**0.00**

Thank you for your business!

Nancy McLean

PUBLIC NOTICES COORDINATOR
o. 413-496-6260
75 South Church Street
Pittsfield, MA 01201

New England Newspapers, Inc.

The Berkshire Eagle

Brattleboro Reformer

Bennington Banner

Manchester Journal

On Fri, Dec 20, 2019 at 10:17 AM James McMahon <james@mcmahonstrategic.com> wrote:
[Quoted text hidden]

New England Newspapers, Inc.

logo.jpg
80K

DS
JM

Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for **1/7/20 at 5:30 PM at 435 Laurel St, Lee MA 01238.** The proposed Enclosed Greenhouse Cultivation and Processing Marijuana Establishment is anticipated to be located at 845 Pleasant Street, Lee, MA 01238. There will be an opportunity for the public to ask questions.

12/24/19

LEGAL NOTICE

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for 1/7/20 at 5:30 PM at 435 Laurel St, Lee MA 01238. The proposed Enclosed Greenhouse Cultivation and Processing Marijuana Establishment is anticipated to be located at 845 Pleasant Street, Lee, MA 01238. There will be an opportunity for the public to ask questions.

LEGAL NOTICE

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for 1/7/20 at 5:30 PM at 435 Laurel St, Lee MA 01238. The proposed Enclosed Greenhouse Cultivation and Processing Marijuana Establishment is anticipated to be located at 845 Pleasant Street, Lee, MA 01238. There will be an opportunity for the public to ask questions.

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PRUDENTIAL CENTER
800 BOYLSTON ST LBBY
BOSTON, MA 02199-9998
240092-0299
(800)275-8777
12/23/2019 04:12 PM

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Product	Qty	Unit Price	Price
First-Class Mail® Letter (Domestic) (EASTMAN, GA 31023) (Weight:0 Lb 0.50 Oz) (Estimated Delivery Date) (Thursday 12/26/2019)	1	$0.55	$0.55
Certified (USPS Certified Mail #) (70190160000115608311)			$3.50
First-Class Mail® Letter (Domestic) (LEE, MA 01238) (Weight:0 Lb 0.50 Oz) (Estimated Delivery Date) (Thursday 12/26/2019)	1	$0.55	$0.55
Certified (USPS Certified Mail #) (70190160000115606706)			$3.50
First-Class Mail® Letter (Domestic) (STAMFORD, CT 06903) (Weight:0 Lb 0.50 Oz) (Estimated Delivery Date) (Thursday 12/26/2019)	1	$0.55	$0.55
Certified (USPS Certified Mail #) (70190160000115606083U4)			$3.50

STC-LEE

Total: $93.15

Debit Card Remit'd $93.15
(Card Name:MasterCard)
(Account #:XXXXXXXXXXXX3640)
(Approval #)
(Transaction #:057)
(Receipt #:031299)
(Debit Card Purchase:$93.15)
(Cash Back:$0.00)
(AID:A0000000042203 Chip)
(AL:Debit)
(PIN:Verified)

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may

JM

Green theory Cultivation, LLC.
Plan for Positive Impact

Green theory Cultivation, LLC. is committed to do our part in positively impacting areas of disproportionate impact. Our plan focuses on employment and the use of suppliers, contractors that have been historically harmed by marijuana prohibition.

The Green theory Cultivation Marijuana Establishment is located within 8 miles of the City of Pittsfield. Pittsfield is a Commission designated "Area of Disproportionate Impact". It is our plan to engage employees, suppliers, contractors from Pittsfield for this plan as well as Commission-designated Economic Empowerment Priority applicants, Commission-designated Social Equity Program participants, Massachusetts residents who have past drug convictions and Massachusetts residents with parents or spouses who have drug convictions.

Green theory Cultivation 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 Green theory Cultivation will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

I. Program Populations

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

1. Past or present residents of "areas of disproportionate impact," which have been defined by the Commission, specifically those areas in the City of Pittsfield.
2. Commission-designated Economic Empowerment Priority applicants;
3. Commission-designated Social Equity Program participants;
4. Massachusetts residents who have past drug convictions; and
5. Massachusetts residents with parents or spouses who have drug convictions.

II. GOALS

1. Create jobs for people from areas of disproportionate impact with a progressive compensation structure, employee benefits and growth opportunities that provide a living wage and encourage consumer spending. Specifically, our goal is to have **20%** of our workforce fall into one or more of the 5 populations identified in Section I.
    a. Of this 20 %, our goal is to have 80-90% of these individuals be past or present residents of "areas of disproportionate impact," 5-10% will be Massachusetts residents who or

whose parents or spouses have past drug convictions and 5-10% will be Commission-designated Social Equity Program participants.

2. Create opportunities for individuals and businesses to participate in the industry by utilizing qualified contractors, suppliers and vendors who have been negatively impacted from marijuana prohibition. Our goal is to source **15%** of our contractors, suppliers and vendors from the populations identified in Section I.

III. EMPLOYMENT PROGRAM

Expanding opportunities for gainful employment is a key driver in helping populations disproportionately affected by marijuana prohibition. Quality jobs that pay above minimum wage, offer benefits and encourage volunteerism assist individuals and families in breaking cycles of poverty and incarceration. Green theory Cultivation expects to positively impact employment in these areas as follows:

1. Hiring Preference will be given to individuals who meet the Program Populations outlined in Section I of this plan.
    a. All Job Postings and other outreach for employment opportunities will clearly outline this hiring preference and encourage candidates who meet the Program Populations to apply.
2. We will engage with BerkshireWorks Career Center, which as a Massachusetts One Stop Career center. BerkshireWorks serves the City of Pittsfield. Green theory Cultivation will post all job posing through BerkshireWorks and will engage in job fairs and other services that BerkshireWorks offers.
    a. Our first Job fair will be held approximately 120 days after we receive our Provisional License from the Commission. Second and subsequent job fairs will be held as needed.
    b. Job postings will also begin approximately 120 days after we receive our Provisional License from the Commission. Additional postings and outreach will be done as employment needs arise.
3. Additional outreach and engagement will be made to the following organizations for the purpose of posting jobs and advertising job fairs:
    a. Pittsfield Chamber of Commerce
    b. Berkshire Eagle
    c. Pittsfield Gazette
    d. 1berskshire.com

IV. SUPPLIER AND CONTRACTOR PROGRAM

Supporting access to this industry can also be achieved by selecting suppliers, vendors and contractors with business. Our supplier, vendor and contractor selection will consider the following factors:

1. Priority will be given to vendors and contractors who are individuals that meet the Program Populations and/or businesses whose ownership or workforce demographics meet the Program Population criteria.
2. Green theory Cultivation will advertise opportunities for vendors, suppliers and contractors on our website and with the local media outlets in Pittsfield. These advertisements will include the priority outlined in this plan.
    a. Pittsfield Chamber of Commerce

b. Berkshire Eagle

c. Pittsfield Gazette

d. 1berskshire.com

These advertisements will be made within 60 days of our receipt of Provisional License. Subsequent advertisements will be made as needed.

3. Wholesale Marijuana partners who are Commission-designated Economic Empowerment Priority applicants will be given priority in sourcing of marijuana products.

   a. We will proactively source Marijuana Retailers who are Commission-designated Economic Empowerment Priority applicants and allow them first choice at buying products from our establishment.

   b. Deferred payment plans will be given to these Marijuana Establishments that will allow them to source our product for much lower upfront costs.

All elements of this program will commence once we receive Provisional License from the Commission.

V. MEASURING AND REPORTING POSITIVE IMPACT

Green theory Cultivation will perform an ongoing and comprehensive evaluation of this plan to ensure that it accomplishes our 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, our management team will meet to discuss the report and make any necessary adjustments.

60 days prior to our license renewal (one year from our receipt of Provisional License), and annually thereafter, we will produce a comprehensive report on our 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 and will include the following data:

1. Number and percentage of employees hired, retained, or promoted that come from populations identified in Section I;
2. The demographics of all employees, applicants, new hires and promotions;
3. Number and types of jobs created in the adult-use cannabis industry in geographic areas of disproportionate impact;
4. Recruitment and hiring data including job postings, advertising, sourcing of candidates, offers of employment, and actual hires;
5. Data on the use of suppliers, vendors and contractors from the populations identified in Section I;

The Commonwealth of Massachusetts

Secretary of the Commonwealth

State House, Boston, Massachusetts 02133

William Francis Galvin
Secretary of the
Commonwealth

February 5, 2020

TO WHOM IT MAY CONCERN:

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

GREEN THEORY CULTIVATION LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **April 16, 2019.**

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

I also certify that the names of all managers listed in the most recent filing are: **HARSH R PATEL**

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

The names of all persons authorized to act with respect to real property listed in the most recent filing are: **HARSH R PATEL**

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

William Francis Galvin

Secretary of the Commonwealth

Processed By:KMT

The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: $500.00

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

Certificate of Organization
(General Laws, Chapter)

Identification Number: 001378969

1. The exact name of the limited liability company is: GREEN THEORY CULTIVATION LLC

2a. Location of its principal office:
No. and Street: 41 PINE RIDGE RD
City or Town: EASTMAN State: GA Zip: 31023 Country: USA

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

No. and Street: 44 SCHOOL SR STE 325
City or Town: BOSTON State: MA Zip: 02108 Country: USA

3. The general character of business, and if the limited liability company is organized to render professional service, the service to be rendered:
REAL ESTATE HOLDINGS

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:
Name: IN CORP SERVICES INC
No. and Street: 44 SCHOOL ST STE 325
City or Town: BOSTON State: MA Zip: 02108 Country: USA

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

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
MANAGER	HARSH R PATEL	41 PINE RIDGE RD EASTMAN, GA 31023 USA

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

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

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

Title	**Individual Name** First, Middle, Last, Suffix	**Address** (no PO Box) Address, City or Town, State, Zip Code
REAL PROPERTY	HARSH R PATEL	41 PINE RIDGE RD EASTMAN, GA 31023 USA

9. Additional matters:

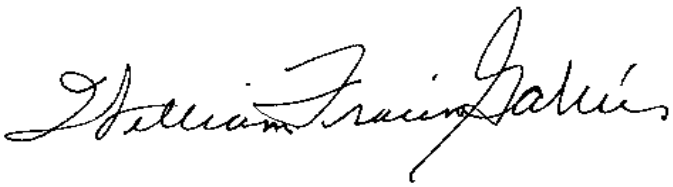
SIGNED UNDER THE PENALTIES OF PERJURY, this 16 Day of April, 2019,
HARSH R PATEL

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

THE COMMONWEALTH OF MASSACHUSETTS

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

April 16, 2019 03:03 PM



WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

Commonwealth of Massachusetts
Department of Revenue
Kevin W. Brown, Acting Commissioner

mass.gov/dor

Letter ID: L0244149312
Notice Date: February 28, 2020
Case ID: 0-000-779-696

CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE

GREEN THEORY CULTIVATION LLC
845 PLEASANT ST LOT
LEE MA 01238-9325

Why did I receive this notice?

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

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

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

What if I have questions?

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

Visit us online!

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

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

Edward W. Coyle, Jr., Chief
Collections Bureau

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

Charles D. Baker
GOVERNOR

Karyn E. Polito
LT. GOVERNOR

175276635

Rosalin Acosta
SECRETARY

Richard A. Jeffers
DIRECTOR

Green Theory Cultivation LLC
845 PLEASANT ST
LEE, MA 01238-9325

EAN: 22159317
February 28, 2020

Certificate Id:35855

The Department of Unemployment Assistance certifies that as of 2/28/2020 ,Green Theory Cultivation LLC is current in all its obligations relating to contributions, payments in lieu of contributions, and the employer medical assistance contribution established in G.L.c.149,§189.

This certificate expires in 30 days from the date of issuance.

Richard A. Jeffers, Director

Department of Unemployment Assistance

CHARLES F. HURLEY BUILDING • 19 STANIFORD STREET • BOSTON, MA 02114
www.mass.gov/uima

OPERATING AGREEMENT OF GREEN THEORY CULTIVATION, LLC

THIS OPERATING AGREEMENT (the "Agreement") is entered into this 26 day of December, 2019, by and among **Green Theory Cultivation, LLC** and relating to those Articles of Organization filed with the State of Massachusetts dated April 16, 2019.

1.1 "Articles of Organization" means the Articles of Organization of **Green Theory Cultivation, LLC**, filed with the Department on April 16, 2019, as the same may be amended from time to time.

1.2 "Company" means **Green Theory Cultivation, LLC**, a Massachusetts limited liability company formed on April 16, 2019.

1.3 "Managing Members" means **Harsh R. Patel**, and those persons who shall become additional or substitute managing members in accordance with the further terms of this Agreement.

1.4 "Member" means **Harsh R. Patel and** MU2020 **,LLC, A Maryland Limited Liability Company**, and those persons who shall become additional or substitute members in accordance with the further terms of this Agreement.

1.5 "Regulation" means the income tax regulations, including any temporary regulations, issued from time to time promulgated under the Code.

ARTICLE II – NAME, OFFICE, PURPOSE, TERM

2.1 Name of Company. The name of the limited liability company is **Green Theory Cultivation, LLC**. The company may do business under that name and under any other name or names upon which the Managing Member selects. If the Company does business under a name other than the name set forth in its Articles of Organization, then the Company shall file a trade name certificate as required by applicable law.

2.2 Purpose. The company is formed solely for the purpose of: (a) to cultivate and sell marijuana units as a distribution to retail dispensaries within the State of Massachusetts (b) to do all things necessary, convenient or incidental to the achievement of the foregoing; and (c) to do anything permitted by the Massachusetts Code.

2.3 Term. The term of the Company commenced on April 16, 2019, when the Department accepted the Articles of Organization of the Company. The term of the Company shall continue until the date set forth in the Articles of Organization as the latest date on which the company is to dissolve, unless its existence is sooner terminated pursuant to Article IX of the Agreement.

2.4 Principal Office. The address of the principal office of the Company shall be **44 School Dr Ste 325 Boston, MA 02108**, or any other place within the State of Massachusetts which the Managing Members select.

2.5 Registered Agent. The name and address of the resident agent of the Company is **Harsh R. Patel, 41 Pine Ridge Rd Eastman, GA 31023.**

ARTICLE III – MEMBERS, CAPITAL, CAPITAL ACCOUNTS

3.1 Initial Capital Contributions. Upon execution of the Agreement, the Members shall contribute to the Company cash, personal guarantees, services and other property as set forth as to their percentage of ownership.

3.2 Additional Capital Contributions.

3.2.1 In the event the Managing Members reasonably determine at any time or from time to time that the Company requires additional Capital Contributions from its Members in order for the Company to acquire, develop, construct or manage a Property; to pay the debts of the Company as they mature in the ordinary course of business; for other capital expenses; or to satisfy the general obligations of the Company; any Managing Member may give notice to all other Members of (i) the total amount of additional Capital Contributions required, (ii) the reason the additional Capital Contribution is required, (iii) each Member's proportionate share of the total additional Capital Contribution (determined in accordance with this Section) and (iv) the date each Member's additional Capital Contribution is due and payable, which date shall be no sooner than thirty (30) days after notice is given, unless waived by all Members.

Each Member's proportionate share of the total additional Capital Contribution (the Member's "Contribution Percentage") shall be as follows:

Member	Contribution Percentage
Harsh R. Patel	**25.00%**
MU 2020, **LLC**	**75.00%**

3.3 Member's Percentage Interest in Distribution of Cash Flow. All Cash Flow distributed to the Members pursuant to this Agreement shall be distributed as follows:

Member	Percentage Interest
Harsh R. Patel	**25.00%**
MU 2020, **LLC**	**75.00%**

3.4 Member's Percentage Interest in Distributions of Capital Proceeds. All Capital Proceeds distributed to the Members pursuant to the occurrence of any Capital transaction shall be distributed to Members based on their respective Capital Transaction Percentage Interest, which is defined as follows:

Member	Percentage Interest
Harsh R. Patel	**25.00%**
MU2020 ,LLC	**75.00%**

ARTICLE IV- BUSINESS, MANAGEMENT AND CONTROL

4.1 Effect of Transfer on Distributions. In the event of the transfer or assignment of all or any part of an Interest of a Member in accordance with the provision of this Agreement, any distribution with respect to such Interest transferred shall be paid to the holder of the Interest on the date of distribution.

ARTICLE V- BUSINESS, MANAGEMENT AND CONTROL

5.1 Business, Management and Control. The business and affairs of the Company shall be managed by **Harsh R. Patel**. No action shall be taken on behalf of the Company unless all Members consent, provided, however that the Managing Members may, by unanimous resolution, delegate various management responsibilities to one or more Persons, including other Members.

5.1(A) Every issue must be signed by all members with date and time.

5.1(B) Every decision concerning monies expenditures over $10,000.00 must be approved by all members. Any monies under $10,000.00 to the same payee which amounts to $100,000.00 paid within the same year must be approved by all members.

5.1(C) All monies from the LLC shall be deposited and withdrawn from a company account at Bank of America.

5.2 Management Fee. The Company shall not pay to the Managing Member a management fee unless the terms thereof are set forth in a written agreement between the Company and the Managing Member, and each of the Members consent in writing to the terms thereof.

5.2(A) Any draw for compensation authorized to Managing Member shall be deducted from the profit distribution noted in 9.1.

ARTICLE VI- ASSIGNMENT OR TRANSFER OF MEMBERSHIP RIGHTS

6.1 Restrictions on Assignment or Transfer of Membership Rights and Interest. Members shall not have the right to sell, transfer, assign, hypothecate, pledge or encumber any or all of the Membership Rights or Interest in the Company, either voluntarily or involuntarily (including, but not limited to, by operation of law) without the unanimous consent of all Members, except that upon the death of **Harsh R. Patel**; such Member's membership rights may be transferred to his/her estate and the estate shall be entitled to exercise all of the rights of the decedent as a Member as long as the estate agrees to be bound by all of the provisions of this Agreement.

6.2 Any additional new member must be approved by all members.

ARTICLE VII- TAX MATTERS, LEGAL, BOOKKEEPING

7.1 Designation of Tax Matters, Legal, Bookkeeping Member. In accordance with applicable code provisions, Milan Sheth, shall be the Tax Matters, Legal, Bookkeeping Member for the Company, provided, however, that such Tax Matters, Legal, Bookkeeping Member shall not take any action as such without the consent and approval of the other Managing Members.

ARTICLE VIII- PROFIT

8.1 Profits from the business shall be distributed each quarter to the members based upon ownership percentages.

IN WITNESS WHEREOF, the parties have executed this Agreement as of the day and year first written above.

MEMBER:

_____

Harsh R. Patel

MEMBER: MU2020 .LLC

Milan Sheth

Milan Sheth

Upesh Patel

Upesh Patel

Green Theory Cultivation, LLC.
Plan for Obtaining Liability Insurance

Green Theory Cultivation, LLC. will obtain and maintain the required General Liability and Product Liability insurance coverage as required pursuant to 935 CMR 500.105(10), or otherwise comply with this requirement. Green Theory Cultivation have engaged with multiple insurance providers offering General and Product Liability Insurance coverage in the amounts required in 935 CMR 500.105(10). These providers are established in the legal marijuana industry. We will engage with the provider who best suits the needs of the company once we receive a Provisional License.

Plan for Obtaining and Maintaining Liability Insurance

1. Once Green Theory Cultivation, LLC. receives its Provisional Marijuana Establishment License we will engage with an insurance provider who is experienced in the legal marijuana industry. We will obtain and maintain general liability insurance coverage for no less than $1,000,000 per occurrence and $2,000,000 in aggregate, annually, and product liability insurance coverage for no less than $1,000,000 per occurrence and $2,000,000 in aggregate, annually. The deductible for each policy shall be no higher than $5,000 per occurrence.
2. If Green Theory Cultivation, LLC. cannot obtain the required insurance coverage, Green Theory Cultivation will place a minimum of $250,000 in an escrow account. These funds will be used solely for the coverage of liabilities. Green Theory Cultivation will replenish this account within ten business days of any expenditure.
3. Green Theory Cultivation, LLC. will maintain reports documenting compliance with 935 CMR 500.105(10) in a manner and form determined by the Commission and make these reports available to the Commission up request.

THREE YEAR BUSINESS PLAN & BUDGET PROJECTIONS

Green Theory Cultivation, LLC. ("GTC") will be the premium standard of recreational cannabis production, particularly focusing on craft cultivation of landrace strains. With a brand new, state-of-the-art hybrid greenhouse of over 15,000 square feet, along with a 3,000 SF processing and manufacturing facility, GTC boasts one of the most sustainable and technology-forward cannabis cultivation and processing facilities in the northeastern United States.

GTC launched in 2018. Since our founding, we have been proud to be a community-focused company – working closely with our local partners in Lee to ensure safe, regulated access to cannabis.

MISSION STATEMENT

GTC seeks to be on the forefront of recreational cannabis production for the Commonwealth of Massachusetts. GTC was founded with a mission to provide the Commonwealth with safe, reliable, and stringently tested cannabis. GTC has developed its facility not only with an eye towards achieving the highest quality product for patients and consumers, but with being identified as the standard for responsible cannabis production and distribution.

GTC's goal is to mass produce our products and provide wholesale prices to RMDs across the Commonwealth. With that in mind, we estimate the yields from our extremely efficient 15,000 sq ft hybrid greenhouse facility to be able to produce some of the rarest and most interesting cannabis in the Commonwealth.

Production Estimates – Cannabis Flower

GTC's cultivation facility sports 5 grow units, each approximately 3,000 square feet, equipped with the most advanced technology built for premium cannabis production. Given the size of GTC's cultivation facility, we estimate a harvest of 300 pounds of cannabis in the first full fiscal year of operations. In the second full year of operations, we are projecting 700 pounds of cannabis harvested. Finally, during GTC's third full year of operations, we project a total of 800 pounds of cannabis.

Production Estimate – Marijuana Infused Products (MIPs)

GTC processes the highest quality oils, extracts, concentrates, and edibles, also called Marijuana Infused Products or MIPs. All our MIPs are produced by the industry's most innovative and creative Extraction Artists and are lab tested and certified for quality and content.

GTC projects to produce 3 Liters of MIPs in the first full fiscal year of operations. In year 2, GTC projects a total of 4 Liters of MIPs. GTC estimates that after manufacturing and operational stabilization, the third full fiscal year will produce 6 Liters.

Projected Revenues

CANNABIS FLOWER

- At prices averaging $300 per ounce, and based on the above harvest projections, GTC estimates revenue of $90,000 in year one of operation. Expenses are projected at $75,000. GTC is projecting a $15,000 profit for the first fiscal year of operation.

- During year two, GTC is projecting revenue of $210,000 and expenses of $100,000. GTC expects to profit $110,000.

- GTC's third full fiscal year of operation is projected to produce $240,000 in revenue. The increase in harvest yield is projected to increase expenses to $125,000. GTC projects a profit of $115,000 in year 3 of operation.

MIPs

- At a price of $85 per Milliliter, and based on the above processing projections, GTC estimates revenue of $255,000.00 Expenses are projected at $150,000. GTC is projecting a $105,000.00 profit for the first fiscal year of operation.

- As processing becomes more efficient, GTC is projecting revenue of $340,000 and a decrease in expenses to $75,000 in its second full year of operation. GTC expects to generate a profit of $265,000

- GTC's third full fiscal year of operation is projected to produce $510,000 in revenue. The increase in processing yield is projected to increase expenses to $100,000. GTC estimates a profit of $410,000.00 in its third year of operation.

Wholesale Distribution

As one of the most specialized cultivation facilities in the Commonwealth, GTC recognizes the impact it could have on the recreational cannabis markets. GTC understands that very few producers are seeking to feature natural, unhybridized landrace strains as a primary feature of the grow.

As uniquely situated wholesale distributors with boutique production capabilities, GTC will never let the Commonwealth cannabis market fall short of its requirements for the most natural cannabis possible. Our facility, and the dedicated employees running it, has the means to keep product flowing for patients in need, and will perform the packaging, labeling, testing, and distribution services for each licensed facility we wholesale to. Those licensees in turn must place our distinctively packaged products on the shelf in a highly visible and featured position, and be trained in why this cannabis is so special.. In short, the entire Commonwealth will benefit from our wholesale distribution platform.

Projected Expansion and Retail Operations

The ability to create a "seed-to-sale" distribution network is a critical step toward success in the cannabis industry. Tracking and assuring the quality of the product from planting to harvest to final sale is paramount to maintaining the trust from the consumer that GTC strives. Thus, GTC will seek untainted and all natural landrace strains as if they were the original discoverers of cannabis in the Himalayas. Consumers can rest assured they will receive the highest quality products directly out of our cultivation facility.

Green Theory Cultivation

Policy for Separating Recreational from Medical Operations

Not Applicable

(Green Theory Cultivation is not a Medical Marijuana Treatment Center)

Green Theory Cultivation
Policy for Quality Control and Testing of Marijuana and Marijuana Products

Green Theory Cultivation is committed to being compliant with all regulations outlined in 935 CMR 500.000 et. seq. ("the Regulations") and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission ("CNB") or any other regulatory agency. This policy has been created to provide clear and concise instructions for all our employees to maintain Quality Control and Testing procedures that are in compliance with the Regulations.

Definitions

Cultivation Batch means a collection of cannabis or marijuana plants from the same seed or plant stock that are cultivated and harvested together, and receive an identical propagation and cultivation treatment including, but not limited to: growing media, ambient conditions, watering and light regimes and agricultural or hydroponic inputs. Clones that come from the same plant are one batch. The marijuana licensee shall assign and record a unique, sequential alphanumeric identifier to each cultivation batch for the purposes of production tracking, product labeling and product recalls.

Independent Testing Laboratory means a laboratory that is licensed by the Commission and is:

(a) Accredited to the International Organization for Standardization 17025 (ISO/IEC 17025: 2017) by a third-party accrediting body that is a signatory to the International Laboratory Accreditation Accrediting Cooperation mutual recognition arrangement or that is otherwise approved by the Commission;

(b) Independent financially from any Medical Marijuana Treatment Center (RMD), Marijuana Establishment or licensee for which it conducts a test; and

(c) Qualified to test cannabis or marijuana in compliance with 935 CMR 500.160 and M.G.L. c. 94C, § 34.

Marijuana means all parts of any plant of the genus Cannabis, not excepted in (a) through (c) and whether growing or not; the seeds thereof; and resin extracted from any part of the plant; clones of the plant; and

every compound, manufacture, salt, derivative, mixture or preparation of the plant, its seeds or resin including tetrahydrocannabinol as defined in M.G.L. c. 94G, § 1; provided that cannabis shall not include:

(a) the mature stalks of the plant, fiber produced from the stalks, oil, or cake made from the seeds of the plant, any other compound, manufacture, salt, derivative, mixture or preparation of the mature stalks, fiber, oil, or cake made from the seeds of the plant or the sterilized seed of the plant that is incapable of germination;

(b) hemp; or

(c) the weight of any other ingredient combined with cannabis or marijuana to prepare topical or oral administrations, food, drink or other products.

Marijuana Products means cannabis or marijuana and its products unless otherwise indicated. These include products have been manufactured and contain cannabis or marijuana or an extract from cannabis or marijuana, including concentrated forms of marijuana and products composed of marijuana and other ingredients that are intended for use or consumption, including edible products, beverages, topical products, ointments, oils and tinctures.

Process or Processing means to harvest, dry, cure, trim and separate parts of the cannabis or marijuana plant by manual or mechanical means, except it shall not include manufacture as defined in 935 CMR 500.002.

Production Batch means a batch of finished plant material, cannabis resin, cannabis concentrate or marijuana-infused product made at the same time, using the same methods, equipment and ingredients. The licensee shall assign and record a unique, sequential alphanumeric identifier to each production batch for the purposes of production tracking, product labeling and product recalls. All production batches shall be traceable to one or more cannabis or marijuana cultivation batches.

Green Theory Cultivation is committed to cultivating healthy, high quality, and disease-free marijuana. Contaminants such as mold, fungus, bacterial diseases, rot, pests, pesticides not in compliance with 500.120(5) for use on marijuana and mildew are the biggest threat to a marijuana cultivation facility and its products. Green Theory Cultivation is committed to utilizing Best Management Practices ("BMP") for the prevention and treatment of possible contaminants using the safest and least invasive means.

Green Theory Cultivation will also implement an industry standard Integrated Pest Management ("IPM") program focusing on preventing pest problems. Preventing pest problems in our cultivation facility will entail minimizing pest access to the facility and the food and shelter available to it. Consequently, IPM relies heavily on the cooperation and participation of all employees. Also, quality control and the testing of marijuana products are essential for the operation of Green Theory Cultivation' cultivation facility. Green Theory Cultivation will utilize best industry practices when it comes to quality control and product testing.

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

All products that Green Theory Cultivation will sell or transfer to other Marijuana Establishment will be tested in accordance with the regulations and this policy. Green Theory Cultivation will not sell or otherwise market marijuana for adult use that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. Any testing results indicating noncompliance with M.G.L. c.132B and the regulations at 333 CMR 2.00 through 333 CMR 14.00 will be immediately reported to the Commission, who may refer any such result to the Massachusetts Department of Agricultural Resources.

Energy and Efficiency

Green Theory Cultivation will satisfy minimum energy efficiency and equipment standards established by the Commission and meet all applicable environmental laws, regulations, permits and other applicable approvals, including those related to water quality and solid and hazardous waste management, prior to obtaining a final license under 935 CMR 500.103(2). Green Theory Cultivation will adopt and use additional best management practices as determined by the Commission, in consultation with the working group established under section 78(b) of St. 2017, c. 55, to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts, and shall provide energy and water usage reporting to the Commission in a form determined by the Commission. These energy efficiency and equipment standards include:

1. The building envelope for our facility will meet minimum Massachusetts Building Code requirements and all Massachusetts amendments (780 CMR: *State Building Code*), International Energy Conservation Code (IECC) Section C.402 or The American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) Chapters 5.4 and 5.5 as applied or incorporated by reference in 780 CMR: *State Building Code*, except that facilities using existing buildings may demonstrate compliance by showing that the envelope insulation complies with code minimum standards for Type Factory Industrial F-1, as further defined in guidelines issued by the Commission.
2. The Lighting Power Densities (LPD) for our cultivation space will not exceed an average of 36 watts per gross square foot of active and growing space canopy, unless otherwise determined in guidelines issued by the Commission.
3. Our Heating Ventilation and Air Condition (HVAC) and dehumidification systems will meet Massachusetts Building Code requirements and all Massachusetts amendments (780 CMR: *State Building Code*), IECC Section C.403 or ASHRAE Chapter 6 as applied or incorporated by reference in (780 CMR: *State Building Code*).
    a. Green Theory Cultivation will provide documentation required under 935 CMR 500.120(11)(b), that includes a certification from a Massachusetts Licensed Mechanical Engineer that the HVAC and dehumidification systems meet Massachusetts building code as specified in this 935 CMR 500.120(11)(c) and that such systems have been evaluated and sized for the anticipated loads of the facility.
4. We will establish documented safety protocols to protect workers and consumers (e.g., eye protection near operating grow light).
5. Green Theory Cultivation understands and acknowledges that the Commission may further define these standards, or create reasonable exemptions or modifications, through guidelines issued in

consultation with the energy and environmental standards working group established under St. 2017, c. 55, § 78(b), including but not limited to provisions for greenhouses and agricultural buildings.

Best Management Practices for Pest Management

1. Our facility is designed and maintained to prevent introduction and spread of pests.
    a. Green Theory Cultivation uses enclosed cultivation and processing operations which are equipped with adequate ventilation, drainage, lighting and temperature controls to maintain optimal conditions for good plant growth while discouraging pests and plant disease.
    b. The Green Theory Cultivation, Cultivation and Processing Facility and operations are designed to permit isolation and sanitation processes necessary to restrict introduction, establishment and spread of pests and plant diseases and permit their management while promoting good plant health and worker safety.
    c. Post-harvest handling facilities are designed and operated to prevent contamination of product by mold, bacteria, viruses, chemicals or other contaminants.
    d. Our facility provides adequate hand-washing facilities for workers.
2. Sanitation protocols to prevent the spread of pests within the facility by workers.
    a. Green Theory Cultivation has developed site-specific pest-preventive protocols for each section of every facility.
    b. We place emphasis on starting with pest-free plant material.
    c. We do not allow smoking in the facility.
    d. We ensure all workers utilize appropriate sanitation protocols.
    e. We ensure all workers receive adequate training.
3. Green Theory Cultivation provides optimal growing conditions to promote healthy plant growth, encourage natural enemies and minimize pest-conducive conditions.
    a. The Green Theory Cultivation facility's ventilation, lighting and heating systems allow us to control and optimize humidity, temperatures and patterns of air movement to support plant growth and natural enemies while discouraging establishment, growth and spread of pests.
    b. Our cultivation team will provide proper plant nutrition and pH to support optimal plant growth while discouraging pests.
    c. We will maintain optimal moisture level in growing medium.
    d. We will provide optimal plant spacing to prevent pest movement among plants and to allow adequate air circulation.
    e. We will keep facilities free of weeds, plant debris, pest harborage, mold, mildew and algae.

4. Our cultivation team has developed effective procedures to regularly and systematically monitor for pests.
    a. We have site-specific pest monitoring protocols for each room in the facility.
    b. We will train all employees in all pest prevention, detection, identification, monitoring and record-keeping protocols.
    c. Identify unknown insect and disease problems.
5. We have developed and will utilize an integrated pest management plan that includes least-risk protocols for preventing and managing common pests.
    a. Green Theory Cultivation utilizes site-specific comprehensive integrated pest management protocols for each room of each facility.
6. Green Theory Cultivation will keep thorough cultivation, pest monitoring and pest management records including:
    a. Detailed records of all pest monitoring and scouting activities. At a minimum record date, numbers of each pest per unit of measure observed, numbers of beneficial organisms observed, amount of pest-caused damage observed, monitoring methods used, and specific locations of pest activity observed.
    b. Detailed records of all non-pesticide actions taken to prevent or treat the crop for disease, insect, mite or other pest issues including but not limited to detailed records on any use of beneficial organisms.
    c. Detailed records of all other substances applied to the plants, to the growing media or to the space or surfaces of the facility.
    d. Detailed records of all fertilizers and soil amendments used in cultivation.
    e. Information about water sources and equipment used in irrigation systems, as well as records of all tests performed to monitor water supplies used in irrigation and any records that establish conformity to any applicable water-use regulations.
    f. Cultivation operations will maintain the following records
        i. Nutrients used during cultivation;
        ii. Detailed records of all other substances applied to the plant(s) surface or used as a fumigant in the cultivation area;

Detailed records of any other substances used during cultivation that may result in a residue on cannabis.

Quality Control – Sanitation Standard Operating Procedure (SOP)

Facility

Green Theory Cultivation facility ("the facility") will be designed and constructed with safe food handing and sanitation in mind. All equipment in the facility will comply with the design and construction standards of appropriate nationally recognized standards and/or code requirements and bear the certification mark of an ANSI accredited organization (e.g. NSF, UL, ETL).

1. All product contact surfaces will be smooth, durable and easily cleanable. The walls, ceiling and floors of all cultivation, processing and storage areas will be constructed of materials that are smooth, durable and can be adequately kept clean and in good repair. There must be coving at base junctures that is compatible with both wall and floor coverings. The coving should provide at least 1/4-inch radius and 4" in height.
2. The facility will provide sufficient space for the placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations and the production of safe marijuana products.
3. Floor drains and floors are effectively sloped and designed prevent pooling water. Drains have proper grating to prevent blockage and stopping of drains.
4. Overhead fixtures, ducts and pipes are designed as to prevent drips or condensate from potential contamination of marijuana products or marijuana products-packaging materials. Piping and conduit is at least 25 mm (2.5 cm) from the walls and ceilings.
5. Aisles or working spaces are provided between equipment and walls and are adequately unobstructed and of adequate width to permit employees to perform their duties and to protect against contaminating infused or marijuana products or infused or marijuana products- contact surfaces with clothing or personal contact.
6. Lighting and light fittings will be shatter-proof or safety-type light bulbs, fixtures, or other glass is used where lighting is suspended over cultivation, processing or storage areas or otherwise protect against marijuana product contamination in case of glass breakage. Suspended lighting is constructed from non- corrodible and cleanable assemblies. Adequate lighting will be installed in hand-washing areas, dressing and locker rooms, and toilet rooms and in all areas where infused or marijuana products are examined, processed, or stored and where equipment or utensils are cleaned. All light bulbs used in the production, processing and storage areas are shatterproof and/or protected with plastic covers. Green Theory Cultivation will ensure adequate safety lighting in all production, processing and storage areas, as well as areas where equipment or utensils are cleaned.
7. Buildings, fixtures, and other physical facilities will be constructed in such a manner that allow them to be maintained in a sanitary condition.
8. Adequate ventilation or control equipment will be installed to minimize odors and vapors (including steam and noxious fumes) in areas where they may contaminate marijuana products. Fans and other air-blowing equipment shall be operated in a manner that minimizes the potential for contaminating infused or marijuana products, infused or marijuana products-packaging materials, and infused or marijuana products-contact surfaces.
9. Handwashing facilities will be adequate and convenient and shall be furnished with running water at a suitable temperature. Handwashing will be located in all production and processing areas and where good sanitary practices require employees to wash and sanitize their hands. Green Theory Cultivation will provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices.
10. The facility water supply comes from the Town of Lee municipal water supply and is sufficient for necessary operations. The facilities plumbing will be of adequate size and design, and adequately

installed and maintained to carry sufficient quantities of water to required locations throughout the facility. Plumbing shall properly convey sewage and liquid disposable waste from the facility. There will be no cross-connections between the potable and wastewater lines. The facility will provide its employees with adequate, readily accessible toilet facilities that will be maintained in a sanitary condition and in good repair.

11. All storage areas will be constructed in a manner that will protect its contents against physical, chemical, and microbial contamination as well as against deterioration of marijuana products or their containers.

Contamination Control

1. All entrance and exit doors to the facility will be self-closing and rodent proof. Air curtains will prevent insects and microbial contaminants from entering the building when doors are in use. Insect screening, HEPA, and carbon filters will prevent pest and microbial contaminants from entering through vents and exhaust from the outside. Foot baths and sticky mats are strategically placed thru out the facility to collect pest and contaminants from foot ware.
2. Employee and visitor gowning will be required. Employees are required to change out of their street clothes and footwear into uniforms and footwear dedicated to the facility. Visitors are required to secure personal belongings and done jump suits and disposable boot covers.
3. Training: All employees will be trained on pest prevention, pest management, pest detection, and pest treatments.
4. Traps for monitoring: Small sticky traps for monitoring of flying or airborne pest shall be posted, mapped and levels of any pest monitored/documented.
5. Handling and storage of marijuana product or marijuana plant waste: All marijuana plant waste will be placed in the "Marijuana Waste" container located in each cultivation and processing area. This container must be impervious and covered at all times. At the end of every day, the "Marijuana Waste" container must be emptied, and the contents transferred to the Marijuana Waste Room. All plant waste will be stored in the waste room in sealed containers until disposal.
6. All non-marijuana waste will be placed into the appropriate impervious covered waste receptacles; Recyclable, Organic and Solid Waste. At the end of every day these containers will be emptied, and the contents removed from the building and placed in the appropriate containers to await pickup.
7. All toxic materials including cleaning compounds, pesticides, sanitizers, etc. will be stored

   in an area away from production, processing and storage areas.

Sanitation

All marijuana products will be prepared, handled, and stored in compliance with;

- The sanitation requirements in 105 CMR 500.000: *Good Manufacturing Practices for Food;*
- The sanitation requirements in 105 CMR 590.000: *Minimum Sanitation Standards for Food Establishments;* and

- The requirements for food handlers specified in 105 CMR 300.000*: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*

1. Storage- Separate storage rooms will be utilized for finished marijuana products.
2. Hand Washing- The facility will have a separate handwashing sink; hand drying device, or disposable towels; supply of hand cleaning agent; and waste receptacle for each processing, production, utensil washing area, and toilet room.
    a. Sinks used for product preparation or for washing equipment or utensils shall not be used for handwashing.
    b. Each handwashing sink will be provided with hot and cold water tempered by means of a mixing valve or a combination faucet to provide water at a temperature of at least 110 degrees Fahrenheit.
    c. Handwashing sinks will be of sufficient number and conveniently located for use by all employees in the production, processing and utensil washing areas. Handwashing sinks will be easily accessible and may not be used for purposes other than handwashing.
3. Toilet Room- A toilet room shall be available for use by all workers. Ventilation will be provided by mechanical means. A soap dispenser and disposable towels shall be provided for hand washing in toilet rooms.
4. Manual Cleaning and Sanitizing- For manual cleaning and sanitizing of equipment and utensils, a stainless steel three-compartment sink will be used.
    a. The sink compartments shall be large enough to hold the largest pot, pan or piece of equipment.
    b. Each compartment will be supplied with adequate hot and cold potable running water.
    c. Integral drainboards of adequate size shall be provided on both sides of the sink for cleaned and soiled utensils.
    d. A floor drain will be located in the immediate vicinity of the sink in areas where wet pots, utensils and equipment are air-drying.
    e. Stainless Steel racks, shelves or dish tables are to be provided adjacent to the warewash sink.
    f. An approved chemical test kit for determining sanitizer strength will be available and used.
    g. Manual Warewashing Procedure
        i. Rinse, scrape, or soak all items before washing.
        ii. Record the date, sanitizer water temperature or test strip results, and initial record on Manual Warewashing Monitoring Form.
        iii. Wash items in the first sink in a detergent solution. Water temperature should be at least 110°F. Use a brush, cloth, or scrubber to loosen remaining soil. Replace detergent solution when suds are gone or water is dirty.

iv. Immerse or spray-rinse items in second sink. Water temperature should be at least 110°F. Remove all traces of food and detergent. If using immersion method, replace water when it becomes cloudy, dirty, or sudsy.

v. Immerse items in third sink filled with hot water or a chemical-sanitizing solution.

1. If hot water immersion is used, the water temperature must be at least 180°F. Items must be immersed for 30 seconds. Proper personal protective equipment should be worn.

2. If chemical sanitizing is used, the sanitizer must be mixed at the proper concentration. (Check at regular intervals with a test kit.) Water must be correct temperature for the sanitizer used.

a. The strength of the sanitizer must be measured in accordance with manufacturer's instructions.

vi. To avoid recontamination of clean and sanitary items:

1. Air dry all items on a drainboard.

2. Wash hands prior to returning to storage.

Warewashing Sink Setup

WASH	RINSE	SANITIZE
110°F	110°F	180°F or
Soapy Water	Clear Water	Chemical Sanitizer

Chemical Solution	Concentration Level	Minimum Temperature	Minimum Immersion Time
Chlorine Solution	25mg/l minimum 50mg/l minimum 100mg/l minimum	120°F 100°F 55°F	10 seconds 10 seconds 10 seconds
Iodine Solution	12.5-25.0mg/l	75°F	30 seconds
Quaternary Ammonium Solution	200 ppm maximum	75°F	30 seconds

h. Equipment Cleaning and Sanitizing Procedure

i. Disassemble removable parts from equipment.

ii. Use the three-sink method to wash, rinse, and sanitize all parts. Verify sanitizer concentration for each meal period and as necessary per policy.

1. Quaternary ammonia –200 ppm and immerse for 30 seconds

2. Iodine –12.5-25.0 ppm and immerse for 30 seconds
3. Chlorine –50-99ppm and immerse for 7 seconds

iii. Wash, rinse, and sanitize all food contact surfaces of the equipment that are stationary.

iv. Allow all parts of the equipment to air dry.

v. After being rinsed and sanitized, equipment and utensils should not be rinsed before air-drying, unless the rinse is applied directly from a ware washing Machine or the sanitizing solution calls for rinsing off the sanitizer after it has been applied in a commercial ware washing Machine.

vi. Re-assemble the equipment.

i. Product Preparation Surfaces- These 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.

i. Prescrape surface to remove gross soils.

ii. Wash surface with recommended strength solution of pot & pan detergent.

iii. Rinse with water and wipe dry.

iv. Using trigger sprayer bottle and a different wiping cloth, apply sanitizing solution of sanitizer.

1. Per label directions, use appropriate test papers to determine correct concentration of the sanitizer solution. Surfaces must remain wet for 60 seconds and allow to air dry.

Personnel

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

   a. Any manager, when he or she knows or has reason to believe that an employee has contracted any disease transmissible through food or has become a carrier of such disease, or any disease listed in 105 CMR 300.200(A) will report the same immediately by email to the Board of Health.

   b. Green Theory Cultivation will voluntarily comply with any and all isolation and/or quarantine orders issued by the Board of Health or the Department of Public Health.

   c. Green Theory Cultivation Agents must report any flu-like symptoms, diarrhea, and/or vomiting to their supervisor. Employees with these symptoms will be sent home with the exception of symptoms from a noninfectious condition.

i. Agents may be re-assigned to activities so that there is no risk of transmitting a disease through food/product.

2. Green Theory Cultivation Agents shall conform to sanitary practices while on duty, including

a. Maintain adequate personal cleanliness:

<u>Grooming</u>:

i. Arrive at work clean – clean hair, teeth brushed, bathed and used deodorant daily.

ii. Maintain short, clean, and polish-free fingernails. No artificial nails are permitted in the food/product production or processing area.

a. Fingernails should be trimmed, filed, and maintained so edges and surfaces are cleanable and not rough.

iii. Wash hands (including under fingernails) and up to forearms vigorously and thoroughly with soap and warm water for a period of 20 seconds:

- When entering the facility before work begins.
- Immediately before preparing or processing products or handling equipment.
- As often as necessary during cultivation or product preparation when contamination occurs.
- In the restroom after toilet use and when you return to your work station.
- When switching between working areas.
- After touching face, nose, hair, or any other body part, and after sneezing or coughing.
- After cleaning duties.
- Between each task performed and before wearing disposable gloves.
- After eating or drinking.
- Any other time an unsanitary task has been performed – i.e. taking out garbage, handling cleaning chemicals, picking up a dropped item, etc.

a. Wash hands only in hand sinks designated for that purpose.

b. Dry hands with single use towels. Turn off faucets using a paper towel, in order to prevent recontamination of clean hands.

<u>Proper Attire:</u>

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

ii. Wear apron or lab coat on site, as appropriate.

- Do not wear apron or lab coat to and from work.
- Take off apron or lab coat before using the restroom.
- Remove apron or lab coat when leaving the production or processing area.
- Change apron or lab coat if it becomes soiled or stained.

iii. Wear disposable gloves with any cuts, sores, rashes, or lesions.

iv. Wear gloves when handling products or product ingredients that will not be heated-treated.

v. Wear gloves when packaging products.

vi. Change disposable gloves as often as handwashing is required. Wash hands before donning and after discarding gloves.

<u>Hair Restraints and Jewelry:</u>

i. Wear a hair net or bonnet in any food/product production or processing area so that all hair is completely covered.

ii. Keep beards and mustaches neat and trimmed. Beard restraints are required in any food/product production or processing area.

iii. Refrain from wearing jewelry in the food/product production and processing area.

- Only a plain wedding band.
- No necklaces, bracelets, or dangling jewelry are permitted.
- No earrings or piercings that can be removed are permitted.

<u>Cuts, Abrasions, and Burns:</u>

i. Bandage any cut, abrasion, or burn that has broken the skin.

ii. Cover bandages on hands with gloves and finger cots and change as appropriate.

iii. Inform supervisor of all wounds.

<u>Smoking, eating, and gum chewing:</u>

i. Green Theory Cultivation facility is a smoke free facility. No smoking or chewing tobacco shall occur on the premises.

ii. Eat and drink in designated areas only. A closed beverage container may be used in the production area if the container is handled to prevent contamination of 1) the employee's hands, 2) the container, and 3) exposed product, clean equipment and utensils.

iii. Refrain from chewing gum or eating candy during work in a food/product production or processing area.

HACCP- Hazard Analysis and Critical Control Point

Green Theory Cultivation will implement a HACCP plan in accordance with *the HACCP Principles & Application Guidelines* issued by the FDA. This HACCP plan will address the processing, production and packaging of all marijuana products that Green Theory Cultivation will manufacture. Once operational Green Theory Cultivation will:

1. Assemble the HACCP team.
2. Describe the product and its distribution.
3. Describe the intended use and consumers of the product.
4. Develop a flow diagram which describes each process.
5. Verify the flow diagram.
6. Conduct a hazard analysis for each product (Principle 1).
7. Determine critical control points (CCPs) for each product (Principle 2).
8. Establish critical limits (Principle 3).
9. Establish monitoring procedures (Principle 4).
10. Establish corrective actions (Principle 5).
11. Establish verification procedures (Principle 6).
12. Establish record-keeping and documentation procedures (Principle 7).

Training

Green Theory Cultivation will provide training and training opportunities to all of its employees. In addition to required training, Green Theory Cultivation will encourage advanced training to all employees in the areas of Plant Safety, Safe Cultivation Processes, Good Manufacturing Practices and HACCP.

1. All employees will be trained on basic plant safety prior to or during the first day of employment.
    a. Include basic product safety training as part of new employee orientation.
    b. The sanitation requirements in 105 CMR 500.000: Good Manufacturing Practices for Food;
    c. The sanitation requirements in 105 CMR 590.000: Minimum Sanitation Standards for Food Establishments; and
    d. The requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements.
2. All employees engaging in the trimming or packaging will be trained and certified in;
    a. A nationally accredited Food Handler Program (i.e. ServSafe)
3. Provide staff with at least bi-annual training on plant safety, Good Manufacturing Practices and HACCP.

4. Monthly in-service training.
5. Require all managers to be Certified Food Protection Mangers (CFPM) by completing a SERVSAFE or similar nationally accredited food safety certification course.
6. Use outside resources, such as Extension specialists, vendors, health department inspectors, or qualified trainers to provide plant safety and HACCP training.
7. Observe staff to ensure they demonstrate plant safety knowledge each day in the workplace.
8. Document the content of all training sessions and attendance.
9. File documentation in HACCP records.

Testing of Marijuana and Marijuana Products

No marijuana product, including marijuana, may be sold or otherwise marketed for adult use that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. Testing of marijuana products shall be performed by an Independent Testing Laboratory in compliance with the protocol(s) established in accordance with M.G.L. c. 94G, § 15 and in a form and manner determined by the Commission, including but not limited to, the *Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products*. Testing of environmental media *(e.g.*, soils, solid growing media, and water) shall be performed in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries* published by the Commission.

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

Green Theory Cultivation will contract with a Licensed Independent Testing Laboratory to test all marijuana batches prior to packaging to ensure contaminant-free purity and correct dosage and potency. We have begun discussions with several Marijuana Testing laboratories which are Accredited to International Organization for Standardization (ISO) 17025 by a third-party accrediting body that is a signatory to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement. Any Laboratory that Green Theory Cultivation contracts with will be Licensed by the Commission prior to Green Theory Cultivation contracting them for testing services.

1. This testing lab will pick up and transport our testing samples to and from their lab. This transportation will comply with Green Theory Cultivation policies and procedures and 935 CMR 500.105(13) if applicable.
2. Green Theory Cultivation will ensure that the storage of all marijuana products at the laboratory complies with 935 CMR 500.105(11).
3. Any and all excess Green Theory Cultivation marijuana product samples used in testing will be disposed of in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to Green Theory Cultivation facility for disposal or by the Independent Testing Laboratory disposing of it directly.

Green Theory Cultivation will not sell or otherwise market for adult use any Marijuana Product that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. The product must be deemed to comply with the standards required under 935 CMR 500.160.

Pursuant to 935 CMR 500.130(4) Green Theory Cultivation will provide documentation of our compliance, or lack thereof, with the testing requirements of 935 CMR 500.160, and standards established by the Commission for the conditions, including time and temperature controls, necessary to protect Marijuana Products against physical, chemical, and microbial contamination as well as against deterioration of finished products during storage and transportation to all marijuana establishments that we sell or otherwise transfer marijuana to.

Required testing includes:

1. Cannabinoid Profile
2. Contaminants as specified by the Department including, but not limited to:
    a. Mold
    b. Mildew
    c. Heavy metals
    d. Plant-Growth Regulators and
    e. Pesticides

Green Theory Cultivation will maintain the results of all testing for no less than one year. All testing results shall be valid for one year.

All testing will be conducted in accordance with the frequency required by the Commission.

Policy for Responding to Laboratory Results that Indicate Contaminant Levels are Above Acceptable Limits

If a laboratory test result indicates that a Green Theory Cultivation marijuana product sample has contaminant levels above the acceptable limits established in the DPH protocols identified in 935 CMR 500.160(1) – Green Theory Cultivation will:

1. Immediately segregate the cultivation or production batch and evaluate next steps.
    a. Using the flow chart below *(Actions in Response to Laboratory Analytical Results),* the Cultivation Manager and CEO will determine whether to:
        i. Retest the Cultivation/Production Batch
        ii. Remediate the Cultivation/Production Batch
        iii. Dispose of Cultivation/Production Batch
2. If the test result indicates has a contaminant level for Pesticides that is above the acceptable limits the Production Batch will be immediately disposed of.
3. If it is determined that the Production Batch cannot be remediated, it will be disposed of.
    a. Our Cultivation Manager or CEO will:

i. Notify the Commission within 72 hours of the laboratory testing results indicating that the contamination cannot be remediated and is being disposed of;

ii. Notify the Commission of any information regarding contamination as specified by the Commission or immediately upon request by the Commission

iii. This notification to the Commission will describe the proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

4. In the case of any test result that indicates that a Green Theory Cultivation marijuana product sample has contaminant levels above the acceptable limits, the Cultivation Manger and CEO will conduct an assessment of the source of the contamination.

    a. This extensive assessment will include investigating all possible sources of contamination including water, media, nutrients, environmental conditions and employee factors.

    b. The assessment should include a corrective action plan and be shared as a training tool with all Green Theory Cultivation Agents.

5. Marijuana and Marijuana Products submitted for retesting prior to remediation will be submitted to an Independent Testing Laboratory other than the laboratory which provided the initial failed result. Marijuana submitted for retesting after documented remediation may be submitted to the same Independent Testing Laboratory that produced the initial failed testing result prior to remediation.

Miscellaneous Marijuana Testing Requirements

1. Clones are subject to these testing provisions but are exempt from testing for metals.
2. All transportation of Marijuana to and from Independent Testing Laboratories providing Marijuana testing services will comply with 935 CMR 500.105(13).
3. All storage of Marijuana at a laboratory providing Marijuana testing services shall comply with 935 CMR 500.105(11).
4. All excess Marijuana must be disposed of in compliance with 935 CMR 500.105(12) by the Independent Testing Laboratory disposing of it directly.
5. Green Theory Cultivation will not sell or otherwise market Marijuana or Marijuana Products for adult use that have not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160.
6. Single-servings of Marijuana Products tested for potency in accordance with 935 CMR 500.150(4)(a) are subject to a potency variance of no greater than plus/minus ten percent (+/- 10%).

Environmental Media Testing

1. All source soils and solids shall be sampled and analyzed prior to use in cultivation.

2. All source soils and solids shall be sampled and analyzed whenever a new source material is utilized (e.g., different source soil location or different source solid manufacturer).

3. All source soils and solids for initial use must be sampled at the rate of one (1) sample per cubic yard of solid environmental media/soil.

4. Source soils and solids passing initial testing requirements may be stockpiled for later use without requiring re-analysis unless;
    a. The stockpile has been contaminated or altered while stored.
5. Situations for re-analysis may include but are not limited to soils that have been;
    a. Amended;
    b. Mixed with other source soils/solids;
    c. Subject to pesticide application;
    d. Used for other purposes; or
    e. Inundated by flood waters.

Supplies Needed: Sample Form, Chain of Custody, Pen, Marker and Sample Container (provided by CDX Labs)

Sampling of Environmental Media for Testing

This procedure applies to all environmental media that is required to be tested in accordance with the Regulations.

Water will be sampled and analyzed prior to use for cultivation of marijuana and quarterly thereafter.

Quality assurance is responsible for all product sampling to meet the compliance criteria. Green Theory Cultivation has contracted with NE Labs for the purposes of testing all of our environmental media and water. Follow the process outlined in the *"Sampling Instructions for Massachusetts DPH Medical Marijuana Program"* form below from NET Labs.

Supplies Needed: Sample Form, Chain of Custody, Pen. Marker, Ziploc bag

1. Label
    a. Label each Ziploc bag with the sample ID, date and time of sampling, and sampler's initials.
2. Fill out the Chain of Custody
    a. List the same info on the chain of custody
    b. One sample ID goes on one line
    c. Check the appropriate boxes
    d. Make sure date and time stamp are filled in
3. Sampling
    a. Fill the Ziploc sample bag with 8 oz. of soil/media
    b. Tightly seal the sample bag

4. Storing Sample
    a. Store samples in a cool, dry location until samples are picked up by a NET Lab courier.
5. Quality Assurance will perform routine audits and analysis of report from the testing lab.

VII. Sampling of Water for Testing

This procedure applies to all water that is required to be tested in accordance with the Regulations.

The Quality Assurance Manager is responsible for all water sampling to meet the compliance criteria. Green Theory Cultivation has contracted with NE Labs for the purposes of testing all of our water. In compliance with the Regulations and the *"Protocol for sampling and analysis of environmental media for Massachusetts Registered Medical Marijuana Dispensaries"* Green Theory Cultivation will sample and test its water supply prior to use for cultivation of marijuana and quarterly thereafter. Following the process outlined in the "Sampling Instructions for Marijuana Testing" form below from NE Labs.

Samples will be taken at the location closest to cultivation area prior to any water treatment and immediately following any treatment systems.

We will test our water for the following contaminants;

1. Metals;
2. Pesticides; and
3. Bacteriological

Collecting Water Samples

1. Samples should not be collected during any periods of unusual activity such as draining of water lines, immediately after changing treatment cartridges or replenishing of hydroponic nutrient solutions.
2. Prior to Sample Collection. The QA Manager or designee will assemble all equipment and information needed before beginning.
    a. Items to assemble before sampling include, but are not limited to, the following:
        i. Sample collection plan or diagram of locations to ensure representative sample collection
        ii. Logbook or sample collection forms
        iii. Chain-of-custody forms (COCs) (See below)
        iv. Disposable gloves
        v. Clean, decontaminated plastic sheeting or other clean, non-porous surface for sample processing;
        vi. Sample containers appropriate for the analyses required;

1. These will be supplied by the lab.

vii. Container labels and pen with indelible ink; and

viii. Supplies to thoroughly clean, decontaminate and dry sampling equipment between samples;

b. Sample collection personnel will create a new entry for each sampling event in the sample collection logbook.

c. Sample collection documentation should identify the sample collection date and start time, participating personnel and locations sampled, relevant environmental conditions, a description of the sampling procedures and equipment decontamination/cleaning used.

d. Sample collection personnel shall identify or determine the number and location of water samples to be collected

i. Sample locations must be recorded in the sample collection logbook. Record the sample location identifier (location ID) for each sample so that it can be utilized to identify the physical location of the sample location within the facility.

ii. Location identifiers should be consistent across sampling events to allow tracking of repeated sample locations. The location IDs will be included on sample labels (unless the grab samples are used in a composite sample).

iii. In addition to the location ID, create a unique sample ID for each sample. Sample identifiers should be unique for a given sample event. Record the location and sample IDs in the sample collection logbook or forms as well as the volume of the sample, preservation, and associated sample containers.

e. Any tools that contact the samples should be made of stainless steel or other inert material to avoid potential contamination of the sample. In addition, all tools that come in contact with the sample media should be rinsed with deionized water between samples to reduce potential cross contamination.

f. Preparing sample labels and affixing them to sample containers immediately before sampling.

i. Information to include on the label includes at a minimum the location and sample ID and date/time of collection. Additional information that must be recorded in documentation if not on the label includes sample collector's name, environmental media type, collection method, whether the sample is a grab or composite sample, and preservation (if applicable).

3. Sample Collection. Collect the planned samples from each sample location one at a time:

a. Don gloves to mitigate potential for contamination of samples.

b. Spread clean, decontaminated plastic sheeting or other nonporous surface near the sample location and lay out any tools and equipment needed.

c. Prepare the sample location by removing faucet aerators if connected. Note the location of any water treatment systems and remove if required to represent pre-treatment location.

d. For sample collection of water lines, purge the lines of standing water and note purge time in sample collection documentation. Generally, for frequently used water 15 minutes run time is considered sufficient but actual time for purge depends on pipe volume and frequency of use.

e. Open the pre-labeled sample containers appropriate for the analyses taking care to not allow errant drips or splashes off other surfaces to enter the caps or containers.

f. Samples for all analyses may be collected directly into sample containers or into a larger, inert vessel then poured into containers. During sample collection, make sure than the tap or spigot does not contact the sample container.

g. Record the time each sample was collected and record any difficulties, inconsistencies with the sampling plan, or other remarks (e.g., environmental conditions) that might be relevant to data analysis or quality assurance.

h. Samples should be refrigerated or maintained on ice until shipped to the analytical laboratory.

i. Chain-of-custody paperwork should be completed immediately prior to shipment.

4. Sample Handling

a. After samples are properly collected and labeled, they should be delivered for analysis as soon as possible. This section describes how to handle, securely store, package, and ship the samples to the laboratory.

b. Sample containers both empty and once containing samples shall be stored in a contaminant-free environment to the degree possible. Sample containers should not be stored for more than one (1) year.

c. All samples should be collected and stored in containers of the appropriate materials based on the analysis method being performed.

d. Until the samples are analyzed, they should be preserved to minimize chemical or physical changes according to the analytical method references.

5. Sample Storage

a. Samples should be refrigerated or maintained on ice (4 ºC +/-2ºC) until they are shipped to the analytical laboratory.

b. Placing the samples in airtight containers with minimal headspace preserves samples by minimizing moisture loss and chemical exchange between the sample medium and air.

c. In addition, protect the samples from excessive light exposure to minimize photochemical degradation. Samples can be protected from light by using an amber

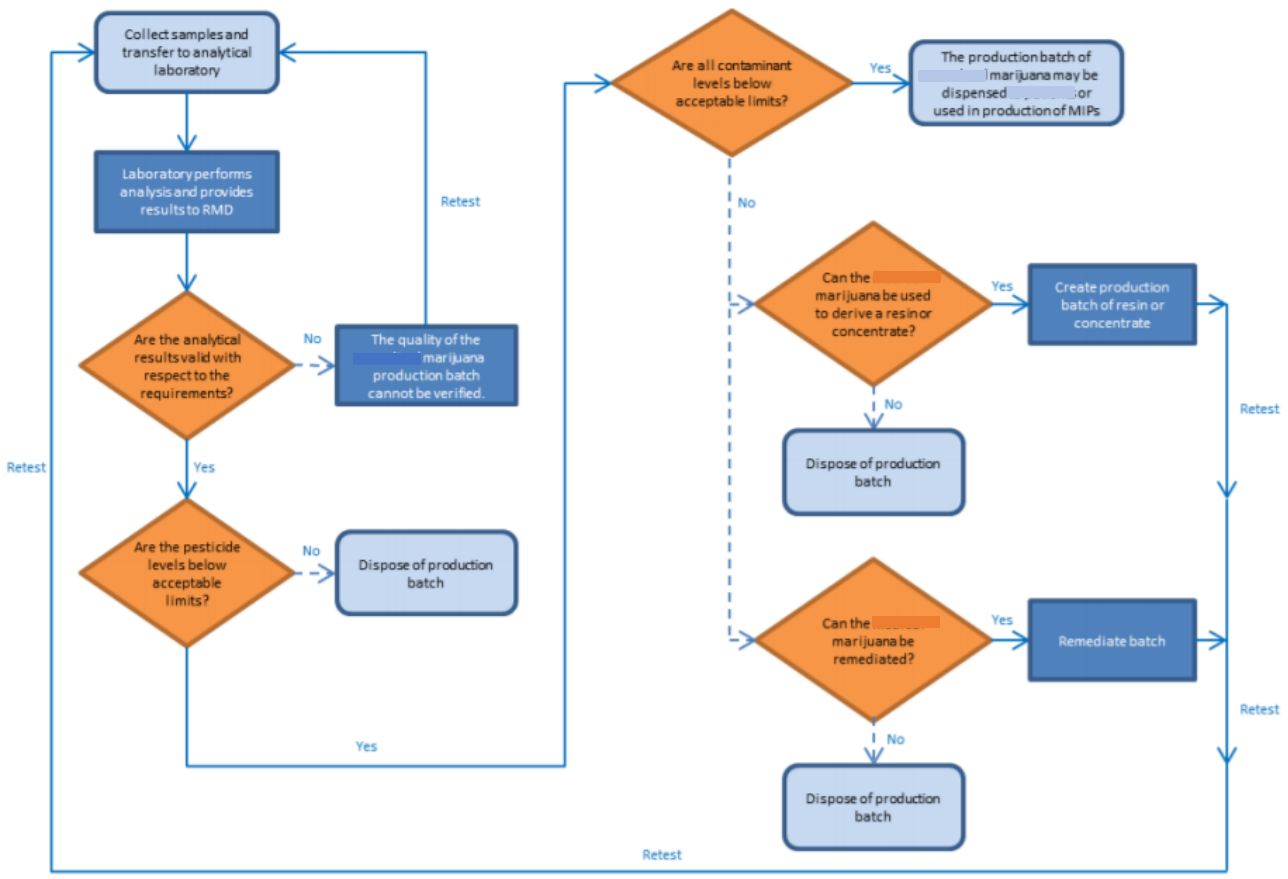
sample container, storing the samples in a closed box or other amber container, or in a dark storage location.

d. To be considered valid, all samples must be analyzed prior to expiration of the technical holding time as defined in each analytical method. Note that the holding time for some biological components is very short; 24 to 48 hours from the time of collection.

Quality Control (QC)

1. Field duplicate samples shall be collected at least annually and one (1) for every twenty (20) field samples of the solid samples collected.
2. Field duplicate samples shall be collected and analyzed for each analytical method performed on the samples.
3. Field duplicate samples will not be identified to the laboratory (blind QC).

Actions in Response to Laboratory Analytical Results



Green Theory Cultivation
Personnel and Background Check Policy

Intent

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

To provide clear and concise instructions for Green Theory Cultivation employees regarding Personnel Policies that are in compliance with the Regulations

Purpose

The purpose of this policy is to outline the responsibilities of the Company, the Company's management team and Agents to ensure specific, methodical, and consistent compliance of the Regulations and to ensure that our personnel policies are compliant will all regulations and laws.

Personnel Records

Green Theory Cultivation will Maintain the following Personnel Records:

1. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
2. A personnel record for each Green Theory Cultivation agent. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with Green Theory Cultivation and shall include, at a minimum, the following:
    a. All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
    b. Documentation of verification of references;
    c. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
    d. Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;

e. Documentation of periodic performance evaluations;

f. A record of any disciplinary action taken; and

g. Notice of completed responsible vendor and eight-hour related duty training.

3. A staffing plan that will demonstrate accessible business hours and safe manufacturing & processing conditions;
4. Personnel policies and procedures; and
5. All background check reports obtained in accordance with M.G.L c. 6 § 172, 935 CMR 500.029, 935 CMR 500.030, and 803 CMR 2.00: Criminal Offender Record Information (CORI).

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

Green Theory Cultivation Agents

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

All Green Theory Cultivation Agents shall:

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

Green Theory Cultivation will submit to the Commission an application for every Green Theory Cultivation Agent, this application will include;

1. The full name, date of birth, and address of the individual;
2. All aliases used previously or currently in use by the individual, including maiden name, if any;
3. A copy of the applicant's driver's license, government-issued identification card, liquor purchase identification card issued pursuant to M.G.L. c. 138, § 34B, or other verifiable identity document acceptable to the Commission;
4. An attestation that the individual will not engage in the diversion of marijuana products;

5. Written acknowledgment by the applicant of any limitations on his or her authorization to cultivate, harvest, prepare, package, possess, transport, and dispense marijuana in the Commonwealth;
6. Background information, including, as applicable:
    a. A description and the relevant dates of any criminal action under the laws of the Commonwealth, or another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority, whether for a felony or misdemeanor and which resulted in conviction, or guilty plea, or plea of nolo contendere, or admission of sufficient facts;
    b. A description and the relevant dates of any civil or administrative action under the laws of the Commonwealth, another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority relating to any professional or occupational or fraudulent practices;
    c. A description and relevant dates of any past or pending denial, suspension, or revocation of a license or registration, or the denial of a renewal of a license or registration, for any type of business or profession, by any federal, state, or local government, or any foreign jurisdiction;
    d. A description and relevant dates of any past discipline by, or a pending disciplinary action or unresolved complaint by, the Commonwealth, or a like action or complaint by another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority with regard to any professional license or registration held by the applicant; and
7. A nonrefundable application fee paid by the Marijuana Establishment with which the marijuana establishment agent will be associated; and
8. Any other information required by the Commission.

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

Green Theory Cultivation will notify the Commission no more than one business day after a Green Theory Cultivation agent ceases to be associated with the establishment. The registration shall be immediately void when the agent is no longer associated with the establishment.

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

After obtaining a registration card for a Green Theory Cultivation Agent registration card, Green Theory Cultivation will notify the Commission, in a form and manner determined by the Commission, as soon as possible, but in any event, within five business days of any changes to the information that the

establishment was previously required to submit to the Commission or after discovery that a registration card has been lost or stolen.

All Agents will carry the registration card at all times while in possession of marijuana products, including at all times while at the establishment or while transporting marijuana products.

Background Checks

Green Theory Cultivation will comply with all Background Check requirements in the Regulations and any other sub-regulatory guidance issued by the Commission.

1. **Application Process-** During the application process Green Theory Cultivation will complete the Background Check Packet as outlined in 935 CMR 500.101(1)(b) which includes;
    a. The list of individuals and entities in 935 CMR 500.101(1)(a)1. (all executives, managers, persons or entities having direct or indirect authority over the management, policies, security operations or cultivation operations of the Marijuana Establishment; close associates and members of the applicant, if any; and a list of all persons or entities contributing 10% or more of the initial capital to operate the Marijuana Establishment including capital that is in the form of land or buildings);
    b. Information for each individual identified in 935 CMR 500.101(1)(a)1., which shall include:
        i. The individual's full legal name and any aliases;
        ii. The individual's address;
        iii. The individual's date of birth;
        iv. A photocopy of the individual's driver's license or other government-issued identification card;
        v. A CORI Acknowledgment Form, pursuant to 803 CMR 2.09: Requirements for Requestors to Request CORI, provided by the Commission, signed by the individual and notarized;
        vi. Authorization to obtain a full set of fingerprints, in accordance with M.G.L. c. 94G, § 21, submitted in a form and manner as determined by the Commission;
    c. Relevant Background Check Information. Applicants for licensure will also be required to provide information detailing involvement in any criminal or civil or administrative matters:
        i. A description and the relevant dates of any criminal action under the laws of the Commonwealth, or an Other Jurisdiction, whether for a felony or misdemeanor including, but not limited to, action against any health care facility or facility for providing Marijuana for medical- or adult-use purposes, in which those individuals either owned shares of stock or served as board member, Executive, officer, director or member, and which resulted in conviction, or guilty plea, or plea of nolo contendere, or admission of sufficient facts;

ii. A description and the relevant dates of any civil action under the laws of the Commonwealth, or an Other Jurisdiction including, but not limited to, a complaint relating to any professional or occupational or fraudulent practices;

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

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

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

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

vii. Any other information required by the Commission.

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

2. **Background Checks not included in the Application Process-** For all Marijuana Establishment Agent Registrations not included in the application process Green Theory Cultivation will submit Marijuana Establishment Agent applications for all required individuals. Green Theory Cultivation will perform is own due diligence in the hiring of employees and contractors and will not knowingly submit an employee or contractors' application if the background check would result in a Mandatory Disqualification or Presumptive Negative Suitability Determination as outlined in 935 CMR 500.802.

Equal Employment Policy

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

job assignment, working conditions, compensation, promotion, benefits, scheduling, training, discipline and termination.

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

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

Anti-Harassment and Sexual Harassment Policy

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

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

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

Green Theory Cultivation will not condone any sexual harassment of its employees. All employees, including supervisors and managers, will be subject to severe discipline, up to and including discharge, for any act of sexual harassment they commit.

Green Theory Cultivation will not condone sexual harassment of its employees by non-employees, and instances of such harassment should be reported as indicated below for harassment by employees.

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

Managers who receive a sexual harassment complaint should carefully investigate the matter, questioning all employees who may have knowledge of either the incident in question or similar problems. The complaint, the investigative steps and findings, and disciplinary actions (if any) should be documented as thoroughly as possible.

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

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

The United States Equal Employment Opportunity Commission ("EEOC") One Congress Street, 10th Floor Boston, MA 02114, (617) 565-3200.

The Massachusetts Commission Against Discrimination ("MCAD") One Ashburton Place, Rm. 601, Boston, MA 02108, (617) 994-6000.

Americans with Disability Act

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

Drug Free Workplace

Green Theory Cultivation is committed to providing its employees with a safe and productive work environment. In keeping with this commitment, it maintains a strict policy against the use of alcohol and the unlawful use of drugs in the workplace. Consequently, no employee may consume or possess alcohol, or use, possess, sell, purchase or transfer illegal drugs at any time while on Green Theory Cultivation

premises or while using Green Theory Cultivation vehicles or equipment, or at any location during work time.

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

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

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

Smoke Free Workplace

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

Employee Assistance Policy

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

Employee Diversion of Marijuana

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

Employee Handbook

Green Theory Cultivation will provide a comprehensive employee handbook to all employees that will outline all the information pertinent to their employment with Green Theory Cultivation**.** These subjects will include, but not me limited to;

1. Green Theory Cultivation Mission and Vision
2. Organizational Structure
3. General Employment Policies
4. Employee Categories
5. Conflicts of Interest
6. Access to Personnel Files

7. Performance Evaluations
8. Hours of Work
9. Compensation
10. Benefits
11. Code of Conduct
12. Discipline
13. Training

Green Theory Cultivation
Record Keeping SOP

Intent

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

To provide clear and concise instructions for Green Theory Cultivation employees regarding Record Keeping that are in compliance with the Regulations

Purpose

The purpose of this policy is to outline the responsibilities of the Company, the Company's management team and Agents to ensure specific, methodical, and consistent compliance of the Regulations and to ensure that our Record Keeping Procedures are compliant will all regulations and laws.

Access to the Commission

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

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

Green Theory Cultivation books, records, papers and other data will be made available upon request by the DOR Accounting records and information in electronic format will be provided in a searchable electronic format if requested by the Commission of the DOR. Any additional reports and schedules relating to the preparation of tax returns will be maintained and made available upon request. Inventory system data as well as any additional purchase reports, schedules or documentation that reconcile to other books and records, such as purchase journals or a general ledger, will also be maintained and made available upon request.

These records will be kept so long as their contents are material in the administration of Massachusetts tax laws. At a minimum, unless the DOR Commissioner consents in writing to an earlier destruction, the

records will be preserved until the statute of limitations for making additional assessments for the period for which the return was due has expired. The DOR may require a longer retention period, such as when the records are the subject of an audit, court case, or other proceeding.

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

1. **Point of Sale (POS) Systems (Not Applicable)**
    a. Green Theory Cultivation is not a Marijuana Retailer, we will not utilize any point of sales system.
2. **Types of Records**

The following records will be maintained and stored by Green Theory Cultivation and available to the Commission upon request:

a. Operating procedures as required by 935 CMR 500.105(1)
    i. Security measures in compliance with 935 CMR 500.110;
    ii. Employee security policies, including personal safety and crime prevention techniques;
    iii. A description of the Marijuana Establishment's hours of operation and after-hours contact information, which shall be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
    iv. Storage of marijuana in compliance with 935 CMR 500.105(11);
    v. Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold;
    vi. Price list for Marijuana and Marijuana Products and any other available products, and alternate price lists for patients with documented Verified Financial Hardship, as defined in 935 CMR 501.002, as required by 935 CMR 501.100(1)(f);
    vii. Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);
    viii. Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
    ix. A staffing plan and staffing records in compliance with 935 CMR 500.105(9);
    x. Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
    xi. Alcohol, smoke, and drug-free workplace policies;
    xii. A plan describing how confidential information will be maintained;
    xiii. A policy for the immediate dismissal of any marijuana establishment agent who has:
        1) Diverted marijuana, which shall be reported to law enforcement officials and to the Commission;

2) Engaged in unsafe practices with regard to operation of the Marijuana Establishment, which shall be reported to the Commission; or

3) Been convicted or entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.

xiv. A list of all board members and executives of a Marijuana Establishment, and members, if any, of the licensee must be made available upon request by any individual. 935 CMR This requirement may be fulfilled by placing this information on the Marijuana Establishment's website.

xv. Policies and procedures for the handling of cash on Marijuana Establishment premises including but not limited to storage, collection frequency, and transport to financial institution(s).

xvi. Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.

xvii. Policies and procedures for energy efficiency and conservation that shall include:

1) Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;

2) Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on the site, and an explanation of why the identified opportunities were not pursued, if applicable;

3) Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and

4) Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants.

xviii. Policies and procedures to promote workplace safety consistent with applicable standards set by the Occupational Safety and Health Administration, including plans to identify and address any biological, chemical or physical hazards. Such policies and procedures shall include, at a minimum, a hazard communication plan, personal protective equipment assessment, a fire protection plan, and an emergency action plan.

b. Operating procedures as required by 935 CMR 500.120(12)

i. Methods for identifying, recording, and reporting diversion, theft, or loss, and for correcting all errors and inaccuracies in inventories. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(8);

ii. Policies and procedures for handling voluntary and mandatory recalls of marijuana products. Such procedures shall be adequate to deal with recalls due to any action initiated at the request or order of the Commission, and any voluntary action by a Marijuana Establishment to remove defective or potentially defective marijuana products from the market, as well as any action undertaken to promote public health and safety;

iii. Policies and procedures for ensuring that any outdated, damaged, deteriorated, mislabeled, or contaminated marijuana products is segregated from other product and destroyed. Such procedures shall provide for written documentation of the disposition of the marijuana products. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(12);

iv. Policies and procedures for transportation. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(13);

v. Policies and procedures to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(15); and

vi. Policies and procedures for the transfer, acquisition, or sale of marijuana products between Marijuana Establishments.

c. Inventory records as required by 935 CMR 500.105(8);

d. Seed-to-sale tracking records for all marijuana products are required by 935 CMR 500.105(8)(e).

e. Personnel records required by 935 CMR 500.105(9)(d), including but not limited to;

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

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

1) All materials submitted to the Commission pursuant to 935 CMR 500.030(2);

2) Documentation of verification of references;

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

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

5) Documentation of periodic performance evaluations;

6) A record of any disciplinary action taken; and

7) Notice of completed responsible vendor and eight-hour related duty training.

iii. A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;

iv. Personnel policies and procedures; and

v. All background check reports obtained in accordance with 935 CMR 500.030

f. Business records, which shall include manual or computerized records of:

i. Assets and liabilities;

ii. Monetary transactions;

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

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

v. Salary and wages paid to each employee, stipend paid to each board member, and an executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the nonprofit corporation, if any.

g. Waste disposal records as required under 935 CMR 500.105(12); and

h. Following closure of a Marijuana Establishment, all records must be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission.

i. Responsible vendor training program compliance records.

j. Vehicle registration, inspection and insurance records. (If Applicable)

k. Host Community records of any cost to a city reasonably related to the operation of the establishment, which would include the city's or town's anticipated and actual expenses resulting from the operation of the establishment in its community.

l. Records of monthly analysis of sales equipment and data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data.

All records kept and maintained by Green Theory Cultivation will be securely held. Access to these records will only be accessible to those Green Theory Cultivation Agents who require access as a part of their job duties.

Green Theory Cultivation
Maintenance of Financial Records Policy and Procedure

Intent

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

To provide clear and concise instructions for Green Theory Cultivation employees regarding the Maintenance of Financial Records that are in compliance with the Regulations

Purpose

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

Policy

Green Theory Cultivation financial records will be kept and maintained according to generally accepted accounting principles. The CFO is responsible for all accounting responsibilities and will engage the services of external Accountants and Tax Professionals to ensure proper accounting compliance. Once operational Green Theory Cultivation will hire or engage as a contractor a bookkeeper with experience in business accounting to assist in the maintaining of these records.

All Green Theory Cultivation financial/business records will be available for inspection to the Commission upon request.

Green Theory Cultivation will maintain all business records in Manual and electronic (computerized) form. These records include, but are not limited to;

1. Assets and liabilities;
2. Monetary transactions;

3. Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
4. Sales records including the quantity, form, and cost of marijuana products; and
5. Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over the marijuana establishment.

In relation to the maintenance of financial records Green Theory Cultivation will incorporate the following into our business operations;

1. Green Theory Cultivation will engage the services of a professional payroll and human resources company to assist in Human resources management and payroll services for our employees
2. Green Theory Cultivation will engage, to the extent possible, a banking relationship in Massachusetts to provide banking services for our company.
3. Green Theory Cultivation will use up to date financial software programs for all financial transactions.
4. Green Theory Cultivation does not plan to make cash transactions with other Marijuana Establishments. All transactions will be done through traditional banking transactions including checks, wire transfers or credit cards.
5. On an annual basis Green Theory Cultivation will engage the services of an independent certified public accountant who is preferably experienced in the legal marijuana industry, to conduct a financial audit of Green Theory Cultivation finances (books).
6. Green Theory Cultivation will engage the services of an industry experienced tax professional for the filing of all required state and federal tax documents.
7. At the end of each business day a reconciliation audit will be done on each POS station by the Facility Manager or designee.
8. Comprehensive financial audits will be done at the end of every day by the CFO or designee. At the discretion of the CFO the frequency of these audits may be changed to weekly and then monthly
9. At a minimum, a comprehensive audit by the CFO or designee of all sales transactions will be completed every month.
10. For the first year of operation the CFO will conduct a comprehensive audit of all of the facility's financial records every 3 months and report their findings to the CEO and COO.

Access to the Commission

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

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

Green Theory Cultivation books, records, papers and other data will be made available upon request by the DOR. Accounting records and information in electronic format will be provided in a searchable electronic format if requested by the Commission of the DOR. Any additional reports and schedules relating to the preparation of tax returns will be maintained and made available upon request. Inventory system data as well as any additional purchase reports, schedules or documentation that reconcile to other books and records, such as purchase journals or a general ledger, will also be maintained and made available upon request.

These records will be kept so long as their contents are material in the administration of Massachusetts tax laws. At a minimum, unless the DOR Commissioner consents in writing to an earlier destruction, the records will be preserved until the statute of limitations for making additional assessments for the period for which the return was due has expired. The DOR may require a longer retention period, such as when the records are the subject of an audit, court case, or other proceeding.

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

Point of Sale (POS) Systems (Retail Only)

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

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

c. tax due,

d. invoice number,

e. date of sale,

f. method of payment, and

g. POS terminal number and POS transaction number.

3. Green Theory Cultivation will maintain auditable internal controls to ensure the accuracy and completeness of the transactions recorded in the POS system. The audit trail details include, but are not limited to:

   a. Internal sequential transaction numbers;

   b. Records of all POS terminal activity; and

   c. Procedures to account for voids, cancellations, or other discrepancies in sequential numbering.

   d. The POS audit trail or logging functionality must be activated and operational at all times, and it must record:

   e. Any and all activity related to other operating modes available in the system, such as a training mode; and

   f. Any and all changes in the setup of the system.

4. Green Theory Cultivation will comply with the provisions of 935 CMR 500.140(6): Recording Sales.

   a. Green Theory Cultivation will only utilize a point-of-sale (POS) system approved by the Commission, in consultation with the DOR.

   b. Green Theory Cultivation may utilize a sales recording module approved by the DOR.

   c. Green Theory Cultivation will not utilize software or other methods to manipulate or alter sales data.

   d. Green Theory Cultivation will conduct a monthly analysis of our equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. Green Theory Cultivation will maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If Green Theory Cultivation determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data:

      i. We will immediately disclose the information to the Commission;

      ii. We will cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and

      iii. We will take such other action directed by the Commission to comply with 935 CMR 500.105.

e. Green Theory Cultivation will comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements.

f. Green Theory Cultivation will adopt separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales.

g. Green Theory Cultivation will allow the Commission and the DOR may audit and examine our point-of-sale system in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.000.

Cash Handling and Transportation

*Note: Green Theory does not intend or expect to conduct any cash transactions

Pursuant to 935 CMR 500.110(7) Green theory Cultivation will have a contract to deposit funds with a financial institution that conducts transaction in cash. We will establish and implement adequate security measures and procedures for safe cash handling and cash transportation to financial institutions or DOR facilities to prevent theft and loss, and to mitigate associated risks to the safety of employees, customers and the general public. These security measures include:

1. An on-site secure locked vault maintained in an area separate from retail sales areas used exclusively for the purpose of securing cash;
2. Video cameras will be directed to provide images of areas where cash is kept, handled and packaged for transport to financial institutions or DOR facilities, these cameras may be motion-sensor activated cameras and provided, further, that all cameras be able to produce a clear, still image whether live or recorded;
3. Green Theory Cultivation will have a written process for securing cash and ensuring transfers of deposits to the Marijuana Establishment's financial institutions and DOR facilities on an incremental basis consistent with the requirements for deposit by the financial institution or DOR facilities; and
4. We will utilize an armored transport provider that is licensed pursuant to M.G.L. c. 147, § 25 (watch, guard or patrol agency) and has been approved by the financial institution or DOR facility.

Green Theory Cultivation
Qualifications and Training Policy and Procedure

Intent

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

To provide clear and concise instructions for Green Theory Cultivation employees regarding the qualifications for employment and agent training that are in compliance with the Regulations

Purpose

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

Qualifications for Green Theory Cultivation Marijuana Establishment Agent

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

All Green Theory Cultivation Agents must;

1. Be 21 years of age or older;
2. Not been convicted of an offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of Other Jurisdictions; and
3. Be determined suitable for registration consistent with the provisions of 935 CMR 500.800 and 935 CMR 500.801 or 935 CMR 500.802

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

Required Training for Green Theory Cultivation Agents

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

1. Our initial training begins during employee orientation where all new employees will be issued their employee handbook. Classroom or online training on this day will include, but not be limited to;
    a. Code of Conduct;
    b. Verifying Identifications;
    c. Marijuana Regulations;
    d. Security and Safety;
    e. Emergency Procedures/Disaster Plan;
    f. Diversion of Marijuana;
    g. Terminatable Offences;
    h. Confidential Information;
    i. Employee Policies (all employee policies from the handbook will be covered) including but not limited to;
        i. Alcohol, smoke and drug-free workplace;
        ii. Equal Employment Policy;
        iii. Anti-Harassment and Sexual Harassment Policy;
        iv. Americans with Disability Act;
        v. Employee Assistance Policy; and
        vi. Diversity Plan
2. After the initial training is complete agents will be trained on job specific areas depending on their duties. This training can be done in a classroom setting, online or computerized, on the job training ("OJT") or through external training platforms.
3. All Green Theory Cultivation Agents will receive a minimum of 8 hours of training annually.
4. Green Theory Cultivation will record, maintain and store documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters. These records will be stored in the Agents Personnel File. Training records will be retained by Green Theory Cultivation for at least one year after agents' termination.
5. Within 90 days of hire, Green Theory Cultivation will require all of its Agents to attend and complete a Responsible Vendor Training Program to become designated as a "responsible vendor."

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

b. Green Theory Cultivation will maintain records of responsible vendor training program compliance for four years and make them available to inspection by the Commission and any other applicable licensing authority upon request during normal business hours.

6. All Green Theory Cultivation Agents responsible for tracking and entering product into the Seed-to-sale SOR (Metrc) will receive training in a form and manner determined by the Commission.

Additional Training

Green Theory Cultivation will provide training and training opportunities to its employees. In addition to required training, Green Theory Cultivation will require advanced training to our employees in the areas of Safety and Security, Marijuana Science or other areas then enhance the Company's, our Agents and our customers safety. These training will include:

1. All Agents who handle marijuana or marijuana products will be trained on basic food safety prior to or during the first day of employment.

    a. Include basic food safety training as part of new employee orientation.

    b. The sanitation requirements in 105 CMR 500.000: Good Manufacturing Practices for Food;

    c. The sanitation requirements in 105 CMR 590.000: Minimum Sanitation Standards for Food Establishments; and

    d. The requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements

2. All employees engaging in the processing or packaging of Marijuana will be trained and certified in;

    a. SERVSAFE Massachusetts Allergen Training Program

    b. SERVSAFE Food Handler Program

3. Cultivation staff will receive bi-annual in-service training on food safety, including food allergy awareness and HACCP.

4. All Managers in cultivation, processing and packaging will be trained as a Certified Food Protection Manager (CFPM) by completing a SERVSAFE or similar nationally accredited food safety certification course.

5. File documentation in HACCP records.

Green Theory Cultivation

Policy for Restricting Access to Age 21 and Older

Green Theory Cultivation, LLC. operations will be compliant with all regulations outlined in 935 CMR 500.000 et. seq. ("the Regulations") and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission ("CNB") or any other regulatory agency.

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

Green Theory Cultivation management team is responsible for ensuring that all persons who enter the facility or are otherwise associated with the operations of the facility are over the age of 21.

Definitions

Law Enforcement Authorities means local law enforcement unless otherwise indicated.

Marijuana Establishment Agent means a board member, director, employee, executive, manager, or volunteer of a Marijuana Establishment, who is **21 years of age or older**. Employee includes a consultant or contractor who provides on-site services to a Marijuana Establishment related to the cultivation, harvesting, preparation, packaging, storage, testing, or dispensing of marijuana.

Visitor means an individual, other than a Marijuana Establishment Agent authorized by the Marijuana Establishment, on the premises of an establishment for a purpose related to its operations and consistent with the objectives of St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000, provided, however, that **no such individual shall be younger than 21 years old**.

Access to the Facility

The Green Theory Cultivation facility allows only the following individuals access to our facility. For the purposes of this Policy the term "facility" also refers to any vehicle owned, leased, rented or otherwise used by Green Theory Cultivation, LLC. for the transportation of Marijuana:

1. Green Theory Cultivation Agents (including board members, directors, employees, executives, managers, or volunteers) must have a valid Agent Registration Card issued by the Commission

and all of Green Theory Cultivation Agents will be verified to be 21 years of age or older prior to being issued a Marijuana Establishment Agent card.

2. All Green Theory Cultivation visitors (including outside vendors and contractors) prior to being allowed access to the facility or any Limited Access Area must produce a Government issued Identification Card to a member of the management team and have their age verified to be 21 years of age of older. If there is any question as to the visitors age, or of the visitor cannot produce a Government Issued Identification Card, they will not be granted access. After the age of the visitor has been verified, they will be given a Visitor Identification Badge. Visitors will always be escorted by a marijuana establishment agent authorized to enter the limited access area. Visitors will be logged in and out of the facility and must return the Visitor Identification Badge upon exiting the facility. The visitor log will always be available for inspection by the Commission.
3. Green Theory Cultivation will ensure that access to the Marijuana Establishment or Marijuana Establishment transportation vehicle will consist of the following:
    a. Agents of the Commission;
    b. Commission Delegees;
    c. State and Local Law enforcement Authorities acting within their lawful jurisdictions;
    d. Police and Fire departments, and emergency medical services acting in the course of their official capacity.

    These individuals described above will be granted immediate access to the facility.

Green theory Cultivation, LLC.
Diversity Plan

Green theory Cultivation goal is to build a high-performing, diverse workforce based on mutual acceptance and trust. We are committed to maintaining a workforce and environment which is diverse with regard to Minorities, Women, Veterans, People with disabilities; and People who as LBGTQ+.

Green theory Cultivation 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 Green theory Cultivation will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

I. Diversity Plan Populations ("Program Populations")

Green theory Cultivation is committed to a diverse and equitable workforce and will implement this plan to ensure access to employment (including management positions) and other relationships with the company. The demographics this plan promotes are outlined below:

Program Populations:

1. Minorities;
2. Women;
3. Veterans;
4. People with disabilities; and
5. People who are LGBTQ+ (Lesbian, Gay, Bisexual, Pansexual, Transgender, Genderqueer, Queer, Intersexed, Agender or Asexual)

II. Goals

The goals that Green theory Cultivation is committed to achieving though this plan and our vision include:

1. Make the Green theory Cultivation workplace and management team as diverse as possible to include qualified employees with no regard to race, gender, age, disability, religion, sexual orientation, or any other non-merit factor. Our goal is to have the following workforce demographic:

    - 50% female.

- 25% will be a minority, veteran, persons with a disability or persons who are LGBTQ+. Of this 25% we aim for the following demographics
    - 75-80% will be a minority
    - 10-15% will be veterans
    - 5-10% will be persons with disability
    - 5-10% will be LBGTQ+

2. Make the Green theory Cultivation workplace a safe, accepting, respectful, welcoming, comfortable and supportive place to work. Our Goal is to have a 75% retention rate among all employees and a 90% job satisfaction rate.
3. Include as our suppliers, contractors and wholesale partners businesses owned by individuals defined in the Program Populations. Our goal is to have 20% of our suppliers and contractors meet these criteria.

III. Recruitment and Hiring Program

Green theory Cultivation looks to recruit and hire diverse employees and plans to promote equity among minorities, veterans, people with disabilities and LGBTQ+ in the operation of our company to the extent possible. To promote diversity and equity Green theory Cultivation will;

1. The Green theory Cultivation hiring plan gives preference to individuals who are identified in the Program Populations.
2. Institute a "blind hiring" policy in which the personal information of the candidate is hidden from the hiring manager during the application review process that can lead to unconscious (or conscious) bias about the candidate.
3. Human Resource training for Hiring Managers that address unconscious bias and cultural sensitivity.
    - This training will be completed within 60 days of hire or promotion and annually thereafter.
4. Promote our Diversity Hiring preferences on recruitment websites (i.e. Indeed, Monster.com) and on our social media presence (i.e. our website, LinkedIn, Facebook etc.)
5. Use job descriptions that are catered to and appeal to diverse candidates.
6. Engage with Industry trade groups, training companies and recruitment companies that promote diversity and inclusion, these include Mass CBA and Elevate NE. Engagement with these groups will include education for our hiring team, leads on candidates that fit our Program Populations and job postings that highlight our diversity hiring preference.

All elements of this program will commence once we receive Provisional License from the Commission.

IV. Inclusion Program

Green theory Cultivation 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 Green theory Cultivation will;

1. Provide training to all employees regarding inclusion in the workplace
    - This training will be completed during onboarding and annually thereafter.
2. Provide advanced training to managers in their roles in fostering an inclusive workplace environment.
    - This training will be completed within 60 days of hire or promotion and annually thereafter.
3. Implementation of our Non-Discrimination, Harassment and Retaliation Policy. This policy includes provisions for responding to complaints, discipline for non-compliance and evaluation of the circumstances to see if this plan needs improvements.
4. Conduct annual surveys of all employees to compile information on job satisfaction, inclusion and the workplace environment.
    - The first survey will be completed 6 months after receiving Provisional License.
5. Conduct detailed exit interviews will all employees who leave the company to compile information on job satisfaction, inclusion and the workplace environment.

All elements of this program will commence once we receive Provisional License from the Commission.

V. Supplier Diversity Program

Green theory Cultivation is committed to utilizing, to the extent possible, minority-owned, women owned, veteran owned, LGBT+ owned and businesses owned by persons with disabilities as our suppliers and contractors. Green theory Cultivation 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. To that end, Green theory Cultivation will give preference to these individuals and companies.

1. Green theory Cultivation will compile data on all suppliers and contactors as to the demographics of the ownership and employees.
2. When sourcing services with suppliers and contactors we will clearly promote the preference outlined above.

All elements of this program will commence once we receive Provisional License from the Commission.

VI. Measurement and Reporting

Green theory Cultivation will perform an ongoing and comprehensive evaluation of this plan to ensure that it accomplishes our 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, our management team will meet to discuss the report and make any necessary adjustments.

60 days prior to our license renewal (one year from our receipt of Provisional License), and annually thereafter, we will produce a comprehensive report on our 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 and will include the following data:

1. All attempts to hire;
2. Actual hires;
3. Demographics of all employees and applicants;
4. Employee training, pay, benefits and advancement;
5. Data compiled from the annual employee survey and from exit interviews;
6. Training records for employees, managers and hiring mangers;
7. The number and percentage of suppliers, contractors and other partners that meet the criteria identified in the Program Population; and
8. A comprehensive ledger on all expenses, contracts and agreements that includes whether or not the expense is a qualifying one under this plan's goals.