Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR285040

Original Issued Date: 05/06/2024

Issued Date: 05/06/2024

Expiration Date: 05/06/2025

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Hidden Wonders, LLC

Phone Number: 508-612-2687

Email Address: hiddenwondersllc@gmail.com

Business Address 1: 27 Robert J. Way

Business Address 2: Unit 1

Business City: Plymouith

Business State: MA

Business Zip Code: 02360

Mailing Address 1: 20 Bassett Road

Mailing Address 2:

Mailing City: Brockton

Mailing State: MA

Mailing Zip Code: 02301

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

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

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 100

Percentage Of Control: 100

Role: Owner / Partner

Other Role:

First Name: Paul **Last Name:** Merian **Suffix:**

Gender: Male **User Defined Gender:**

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

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY
No records found

CLOSE ASSOCIATES AND MEMBERS
No records found

CAPITAL RESOURCES - INDIVIDUALS
Individual Contributing Capital 1

First Name: Paul **Last Name:** Merian **Suffix:**

Types of Capital: Monetary/Equity **Other Type of Capital:** **Total Value of the Capital Provided:** $250000 **Percentage of Initial Capital:** 100

Capital Attestation: Yes

CAPITAL RESOURCES - ENTITIES
No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES
No records found

DISCLOSURE OF INDIVIDUAL INTERESTS
Individual 1

First Name: Paul **Last Name:** Merian **Suffix:**

Marijuana Establishment Name: Hyecorp LLC **Business Type:** Marijuana Retailer

Marijuana Establishment City: Brockton **Marijuana Establishment State:** MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS
Establishment Address 1: 27 Robert J. Way

Establishment Address 2: Unit 1

Establishment City: Plymouth **Establishment Zip Code:** 02360

Approximate square footage of the establishment: 4200 **How many abutters does this property have?:** 14

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

HOST COMMUNITY INFORMATION
Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	HCA Certification.pdf	pdf	651eb3f3ca49d200073425f0	10/05/2023
Plan to Remain Compliant with Local Zoning	Zoning Compliance.pdf	pdf	6543a9d856bf530007dd059d	11/02/2023
Certification of Host Community Agreement	RFI1 #3 HCA - No Interest Document.pdf	pdf	654bec2705d57d0007dcd912	11/08/2023
Community Outreach Meeting Documentation	Hidden Wonders - COM Attestation with Attachments_Redacted.pdf	pdf	655bcf37bc2d09000872348e	11/20/2023

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

POSITIVE IMPACT PLAN

Positive Impact Plan:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	HIDDEN WONDERS Positive Impact Plan v2 - 11.16.23 with Letters.pdf	pdf	65568fa80a76090008af8dbe	11/16/2023
Other	HIDDEN WONDERS Positive Impact Plan - Growthways Letter.pdf	pdf	655bd076bc2d090008723762	11/20/2023
Other	Hidden Wonders Positive Impact Plan v_2 - Mission Food Pantry.pdf	pdf	655bd0ecbc2d090008723971	11/20/2023

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner

Other Role:

First Name: Paul

Last Name: Merian **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	HW Cert of Good standing - MA SOS.pdf	pdf	65368e8c56bf530007d272fc	10/23/2023
Articles of Organization	Certificate of Organization - Hidden Wonders - filed.pdf	pdf	65368eb4d70a980008e9726f	10/23/2023
Bylaws	LLC_Operating Agreement_Hidden Wonders LLC - signed.pdf	pdf	654fff0a56bf530007e66c4d	11/11/2023
Department of Revenue - Certificate of Good standing	HW - DUA Signed affadavit.pdf	pdf	654fff3056bf530007e66c71	11/11/2023
Department of Revenue - Certificate of Good standing	COGS.pdf	pdf	655508e956bf530007eab655	11/15/2023

No documents uploaded

Massachusetts Business Identification Number: 001645746

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	Hidden Wonders - Business Plan (1).pdf	pdf	653691c0d70a980008e97c60	10/23/2023
Plan for Liability Insurance	Hidden Wonders - Plan to Obtain Liability Insurance.pdf	pdf	65369213d70a980008e97d03	10/23/2023
Proposed Timeline	Hidden Wonders Proposed Timeline - 10.23.2023.pdf	pdf	6536947cd70a980008e983fc	10/23/2023

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Qualifications and training	Hidden Wonders - Qualification and Training.pdf	pdf	6543ad78d70a980008f43a46	11/02/2023
Quality control and testing	Hidden Wonders - Quality Control and Testing.pdf	pdf	6543aef2d70a980008f43f22	11/02/2023
Dispensing procedures	Hidden Wonders - Dispensing.pdf	pdf	6543af53d70a980008f43f94	11/02/2023
Maintaining of financial records	Hidden Wonders - Maintenance of Financial Records.pdf	pdf	6543af92d70a980008f44007	11/02/2023
Energy Compliance Plan	Hidden Wonders - Energy Compliance.pdf	pdf	6543afba56bf530007dd1563	11/02/2023
Inventory procedures	Hidden Wonders - Inventory Procedures.pdf	pdf	6543afeb56bf530007dd1590	11/02/2023
Record Keeping procedures	Hidden Wonders - Record Keeping.pdf	pdf	6543b012d70a980008f44082	11/02/2023
Prevention of diversion	Hidden Wonders - Diversion Policy.pdf	pdf	6543b058d70a980008f44126	11/02/2023
Plan for obtaining marijuana or marijuana products	Hidden Wonders - Plan for Obtaining Marijuana.pdf	pdf	6543b1e1d70a980008f4471f	11/02/2023
Storage of marijuana	Hidden Wonders - Plan for Storage.pdf	pdf	6543b20c56bf530007dd1d47	11/02/2023
Restricting Access to age 21 and older	Hidden Wonders - Plan for Resctricting Access for Under 21.pdf	pdf	6543b24cd70a980008f448e6	11/02/2023
Transportation of marijuana	Hidden Wonders - Plan forTransportation.pdf	pdf	6543b28c56bf530007dd1de2	11/02/2023
Security plan	Hidden Wonders - Security Plan.pdf	pdf	6543b34ad70a980008f44bbf	11/02/2023
Personnel policies including background checks	Hidden Wonders - Personnel Policy.pdf	pdf	6543b38656bf530007dd2083	11/02/2023
Diversity plan	Hidden Wonders - Diversity Plan - 11.20.23.pdf	pdf	655bdc2aa1260900088c7811	11/20/2023

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

ATTESTATIONS

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

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

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

Notification:

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification:

COMPLIANCE WITH POSITIVE IMPACT PLAN - PRE FEBRUARY 27, 2024

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

Monday From: 8:00 AM	**Monday To:** 9:00 PM
Tuesday From: 8:00 AM	**Tuesday To:** 9:00 PM
Wednesday From: 8:00 AM	**Wednesday To:** 9:00 PM
Thursday From: 8:00 AM	**Thursday To:** 9:00 PM
Friday From: 8:00 AM	**Friday To:** 9:00 PM
Saturday From: 8:00 AM	**Saturday To:** 9:00 PM
Sunday From: 8:00 AM	**Sunday To:** 9:00 PM

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Host Community Agreement Certification Form

Instructions

Certification of a host community agreement is a requirement of the application to become a Marijuana Establishment (ME) and Medical Marijuana Treatment Center (MTC). Applicants must complete items 1-3. The contracting authority for the municipality must complete items 4-8. Failure to complete a section will result in the application not being deemed complete. This form should be completed and uploaded into your application. Please note that submission of information that is "misleading, incorrect, false, or fraudulent" is grounds for denial of an application for a license pursuant to 935 CMR 500.400(2) and 501.400(2).

Certification

The parties listed below do certify that the applicant and municipality have executed a host community agreement on the specified date below pursuant to G.L. c. 94G § 3(d):

1. Name of applicant:

   Hidden Wonders, LLC

2. Name of applicant's authorized representative:

   Scott Rubin, Esq.

3. Signature of applicant's authorized representative:

4. Name of municipality:

   Plymouth

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

   Brad Brothers

6. Signature of municipality's contracting authority or authorized representative:

[signature]

7. Email address of contracting authority or authorized representative of the municipality *(this email address may be used to send municipal notices pursuant to 935 CMR 500.102(1) and 501.102(1).)*:

bbrothers@plymouth-ma.gov

8. Host community agreement execution date:

9/5/23

HIDDEN WONDERS, LLC

Plan to Remain Compliant with Local Zoning

The address for Hidden Wonders's ("HW") proposed Marijuana Retail Dispensary is 27 Robert J. Way, Unit 1, Plymouth, Massachusetts. The Dispensary will comply with all Plymouth Recreational Marijuana zoning requirements.

In accordance with Plymouth's Zoning Bylaws, the proposed property is located in Plymouth's Light Industrial Zone (LI). In compliance with 935 CMR 500.110(3), Hidden Wonders's retail property is not located within 500 feet of an existing public or private school providing education to children in kindergarten or grades 1 through 12, nor located within 2,000 feet of another Marijuana Establishment.

Owner Paul Merian has run his family-owned business, Tuxedos by Merian, in Brockton for over 30 years. As owner and Chief Executive Officer/Chief Financial Officer for Hidden Wonders, Mr. Merian has extensive first-hand knowledge of state and municipal compliance, as a local business owner and in his voluntary, appointed work as a member of the City of Brockton's Zoning Board of Appeals from 2007-2013 and for Brockton's License Commission since 2013-2018, entities which have local and state oversight.

Additionally, Mr. Merian is also an owner of Hyecorp, LLC d/b/a Green4all, a retail marijuana dispensary, operational for almost 3 years.

As one of five members on the Brockton Zoning Board, Mr. Merian reviewed business applications that required variance for conformity of zoning uses, making sure that any variances strictly adhered to code, and were compliant, as required by the city's and state's pertinent laws and ordinances.

In his role on the License Commission, Mr. Merian worked with other Commission members and the Plymouth City Solicitor's Office to enforce code for licenses relating to alcohol and food permits for restaurants and special events, as well as new and used car sales licenses, and special permits for fundraising, fairs and one-day events. The License Commission grants and removes licenses, and conducts yearly compliance reviews, acting in accordance with ordinances, codes and compliance as defined by city and state laws.

As mentioned above, Mr. Merian has in-depth knowledge of Massachusetts' state and local marijuana laws and regulations, experience which he will leverage as Hidden Wonders' sole owner. HW's operational plan is well positioned to ensure its operations will be compliant with the Town's local requirements.

HW intends to abide by all local regulations and rules concerning its operation and any improvements or alterations to Hidden Wonders' premises.

HW shall provide access to its premises and records at any time requested by local authorities. Hidden Wonders will remain compliant at all times with the local zoning requirements set forth in the Town of Plymouth's Zoning Ordinance.

In accordance with the Zoning Ordinance, HW's proposed retail facility is located in an area that has been designated by the Town of Plymouth for the aforementioned uses.

As required by Town of Plymouth, HW has applied for and obtained a Special Permit from the Zoning Board Appeal and will comply with all conditions and standards set forth in any local permit required to operate aMarijuana Establishment at HW's proposed location.

HW has attended several meetings with various municipal officials and boards to discuss HW's plans for a proposed Marijuana Establishment and has executed a Host Community Agreement with the Town of Plymouth.

HW will continue to work closely with Plymouth's various municipal departments, boards, and officials to ensure that HW's Marijuana Establishment remains compliant with all local laws, regulations, rules, and codes with respect to design, construction, operation, and security.

In addition, HW has retained the law firm Law Offices of Scott B. Rubin, P.C., which will represent and work in conjunction with HW and the Town of Plymouth on zoning compliance and related requirements.

At this time, HW has obtained all of its requirements from the Town of Plymouth including a Special Permit from the Zoning Board.

HIDDEN WONDERS, LLC

NO OWNERSHIP AFFIDAVIT

I, Scott B. Rubin, Esq., state under the pains and penalties of perjury, that I am acting as legal counsel to Hidden Wonders, LLC, and have no direct or indirect interest in Hidden Wonders, LLC.

Scott B. Rubin, Esq.

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Community Outreach Meeting Attestation Form

Instructions

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

Attestation

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

1. The Community Outreach Meeting was held on the following date(s): Nov. 1. 2023

2. At least one (1) meeting was held within the municipality where the ME is proposed to be located.

3. At least one (1) meeting was held after normal business hours (this requirement can be satisfied along with requirement #2 if the meeting was held within the municipality and after normal business hours).

(774) 415-0200 | MassCannabisControl.Com | Commission@CCCMass.Com

4. A copy of the community outreach notice containing the time, place, and subject matter of the meeting, including the proposed address of the ME or MTC was published in a newspaper of general circulation in the municipality at least 14 calendar days prior to the meeting. A copy of this publication notice is labeled and attached as "Attachment A."

   a. Date of publication: 10/12/23

   b. Name of publication: Old Col. Mem.

5. A copy of the community outreach notice containing the time, place, and subject matter of the meeting, including the proposed address of the ME or MTC was filed with clerk of the municipality. A copy of this filed notice is labeled and attached as "Attachment B."

   a. Date notice filed: 10/13/23

6. A copy of the community outreach notice containing the time, place, and subject matter of the meeting, including the proposed address of the ME or MTC was mailed at least seven (7) calendar days prior to the community outreach meeting to abutters of the proposed address, and residents within 300 feet of the property line of the applicant's proposed location as they appear on the most recent applicable tax list, notwithstanding that the land of the abutter or resident is located in another municipality. A copy of this mailed notice is labeled and attached as "Attachment C." Please redact the name of any abutter or resident in this notice.

   a. Date notice(s) mailed: 10/17/2023

7. The applicant presented information at the Community Outreach Meeting, which at a minimum included the following:
   a. The type(s) of ME or MTC to be located at the proposed address;
   b. Information adequate to demonstrate that the location will be maintained securely;
   c. Steps to be taken by the ME or MTC to prevent diversion to minors;
   d. A plan by the ME or MTC to positively impact the community; and
   e. Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.

8. Community members were permitted to ask questions and receive answers from representatives of the ME or MTC.

Name of applicant:

Hidden Wonders, LLC

Name of applicant's authorized representative:

Paul B. Merian

Signature of applicant's authorized representative:

EXHIBIT "A"

LOCALiQ

NEW ENGLAND

PO Box 631210 Cincinnati, OH 45263-1210

PROOF OF PUBLICATION

Scott B. Rubin, PC, Law Office Of
71 Legion PKWY # 3
Brockton MA 02301-7225

STATE OF MASSACHUSETTS, COUNTY OF PLYMOUTH

The Old Colony Memorial, a newspaper printed and published in the city of Plymouth, and of general circulation in the County of Plymouth, State of Massachusetts, and personal knowledge of the facts herein state and that the notice hereto annexed was Published in said newspapers in the issue:

10/12/2023

and that the fees charged are legal.

Sworn to and subscribed before on 10/12/2023

Legal Clerk

Notary, State of WI, County of Brown

8 25 26

My commision expires

Publication Cost:	$76.78	
Order No:	9374306	# of Copies:
Customer No:	846145	-1
PO #:		

THIS IS NOT AN INVOICE!

Please do not use this form for payment remittance.

MARIAH VERHAGEN
Notary Public
State of Wisconsin

COMMUNTIY OUTREACH MEETING 11/1
LEGAL NOTICE

Notice is hereby given that a Community Outreach Meeting for a proposed Mariiuana Establishment is scheduled for November 1, 2023 at 6:30 P.M. at 27 Robert J. Way, Unit 1, Plymouth, MA 02360. The proposed Mariiuana Retail Establishment is anticipated to be located at 27 Robert J. Way, Unit 1, Plymouth, MA 02360. There will be an opportunity for the public to ask questions."

AD#9374306
OCM 10/12/2023

EXHIBIT "B"

LAW OFFICE OF
SCOTT B. RUBIN, P.C.

71 Legion Parkway, 3rd Floor, Brockton, MA 02301
T: 508-587-0142 F: 508-588-2667
E: srubin@sillaw.com

RECEIVED
TOWN CLERK'S OFFICE
PLYMOUTH, MA

2023 OCT 13 AM 11:10

003026

RECEIVED
OCT 13 2023
BOARD OF APPEALS
PLYMOUTH, MA

RECEIVED
OCT 13 2023
Town Manager's Office
Plymouth, MA 02360

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for ***November 1, 2023*** at ***6:30 P.M.*** at ***27 Robert J. Way, Unit 1, Plymouth, MA 02360***. The proposed Marijuana Retail Establishment is anticipated to be located at ***27 Robert J. Way, Unit 1, Plymouth, MA 02360***. There will be an opportunity for the public to ask questions.

EXHIBIT "C"

LAW OFFICE OF
SCOTT B. RUBIN, P.C.

71 Legion Parkway, 3rd Floor, Brockton, MA 02301
T: 508-587-0142 **F**: 508-588-2667
E: srubin@sillaw.com

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for ***November 1, 2023*** at ***6:30 P.M.*** at ***27 Robert J. Way, Unit 1, Plymouth, MA 02360***. The proposed Marijuana Retail Establishment is anticipated to be located at ***27 Robert J. Way, Unit 1, Plymouth, MA 02360***. There will be an opportunity for the public to ask questions.

#178

TOWN OF PLYMOUTH
ASSESSORS' OFFICE
26 Court Street
Plymouth, MA 02360
(508) 747-1620 x10296
assessors@plymouth-ma.gov

RECEIVED
SEP 28 2023
Assessors Office
PLYMOUTH, MA

Abutter List Report
(Please allow 10 days for final list)

RECORD OWNER: FURNACE BROOK, LLC

CONTACT PERSON: SCOTT RUBIN

MAILING ADDRESS: 71 LEGION PARKWAY, 3RD FL.
BROCKTON, MA 02301

TELEPHONE NO.: 508) 631-7106

EMAIL: SRUBIN@SRUBINLAW.COM

Please specify type of request:
☐ Direct Abutter ☐ 100' – Conservation ☑ 300' – Planning/Zoning

Locus:

Subject Address: 27 ROBERT J. WAY, Unit 1

Parcel ID: 083-023-037-001

This is to certify that at the time of the last assessment for taxation made by the Town of Plymouth, the names and addresses of the parties assessed as adjoining owners to the parcel land shown as above written.

Assessor's Use Only

DATE: October 3, 2023

*ownership as of 6/30/2023

CERTIFIED BY:

Anne Dunn, MAA
Director of Assessing

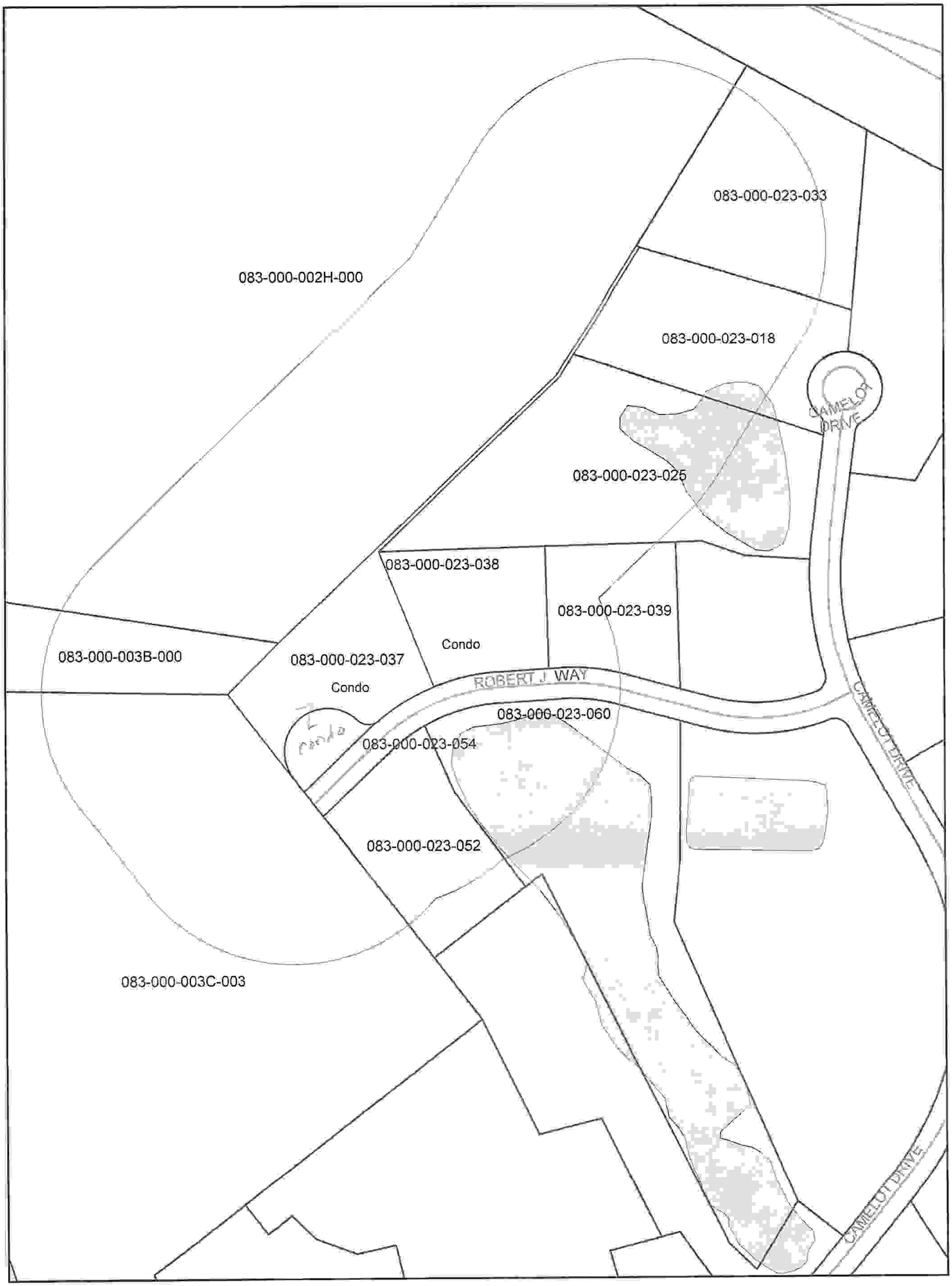
10/3/2023

Town of Plymouth
Abutters List

Subject Parcel ID: ***083-023-037-001***
Subject Property Location: ***27 Robert J Way, Unit 1***

Parcel ID	Comment	Location	Owner	Co-Owner	Mailing Address	City	State	Zip
083-000-002H-000		26 LONG POND RD	[redacted]		26 LONG POND RD	PLYMOUTH	MA	02360
083-000-003B-000		LONG POND RD	[redacted]		44 OBERY ST	PLYMOUTH	MA	02360
083-000-003C-003		46-- 100 SHOPS AT 5 WAY	[redacted]		PO BOX 335	CENTRAL VALLEY	NY	10917
083-000-023-018		172 CAMELOT DR	[redacted]		PO BOX 1018	MANOMET	MA	02345
083-000-023-025		172-R CAMELOT DR	[redacted]		PO BOX 1018	MANOMET	MA	02345
083-000-023-033		0 CAMELOT DR	[redacted]		26 COURT ST	PLYMOUTH	MA	02360
083-000-023-038A	condo - lot 23-38	21 ROBERT J WAY, Unit A	[redacted]		21 ROBERT J WAY	PLYMOUTH	MA	02360
083-000-023-038B	condo - lot 23-38	21 ROBERT J WAY, Unit B	[redacted]		31 KATHLEEN DR	PLYMOUTH	MA	02360
083-000-023-038C	condo - lot 23-38	21 ROBERT J WAY, Unit C	[redacted]		21 ROBERT J WAY	PLYMOUTH	MA	02360
083-000-023-039		15 ROBERT J WAY	[redacted]	15 ROBERT J WAY J LLC	777 THIRD AV 26TH FL	NEW YORK	NY	10017
083-000-023-052		CAMELOT DR	[redacted]		106 CAMELOT DR	PLYMOUTH	MA	02360
083-000-023-060		CAMELOT DR	[redacted]		130 CAMELOT DR STE 2	PLYMOUTH	MA	02360
083-023-037-001	condo - lot 23-37 & 23-54	27 ROBERT J WAY	[redacted]		27 ROBERT J WAY	PLYMOUTH	MA	02360
083-023-037-002	condo - lot 23-37 & 23-54	27 ROBERT J WAY	[redacted]		27 ROBERT J WAY	PLYMOUTH	MA	02360

300' Abutters - 27 Robert J Way, Unit 1



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Manomet, MA 02345

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☐ Return Receipt (electronic)	$ $0.00	
☐ Certified Mail Restricted Delivery	$ $0.00	
☐ Adult Signature Required	$ $0.00	
☐ Adult Signature Restricted Delivery	$	
Postage $	$0.66	
Total Postage and Fees $	$8.56	10/20/2023

083-000-023-018 172 CAMELOT DR

[redacted]

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Street and Apt. No., or PO Box No.

City, State, ZIP+4®

PO BOX 1018

MANOMET MA 02345

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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☐ Certified Mail Restricted Delivery	$ $0.00	
☐ Adult Signature Required	$ $0.00	
☐ Adult Signature Restricted Delivery	$	
Postage $	$0.66	
Total Postage and Fees $	$8.56	10/20/2023

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[redacted]

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City, State, ZIP+4®

PO BOX 335

CENTRAL VALLEY NY 10917

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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Plymouth, MA 02360

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$	$3.55	
Extra Services & Fees (check box, add fee as appropriate)		
☐ Return Receipt (hardcopy)	$ $0.00	Postmark Here
☐ Return Receipt (electronic)	$ $0.00	
☐ Certified Mail Restricted Delivery	$ $0.00	
☐ Adult Signature Required	$ $0.00	
☐ Adult Signature Restricted Delivery	$	
Postage $	$0.66	
Total Postage and Fees $	$8.56	10/20/2023

083-000-003B-000 LONG POND RD

[redacted]

Sent To

Street and Apt. No., or PO Box No.

City, State, ZIP+4®

44 OBERY ST

PLYMOUTH MA 02360

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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$	$3.55	
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☐ Return Receipt (hardcopy)	$ $0.00	Postmark Here
☐ Return Receipt (electronic)	$ $0.00	
☐ Certified Mail Restricted Delivery	$ $0.00	
☐ Adult Signature Required	$ $0.00	
☐ Adult Signature Restricted Delivery	$	
Postage $	$0.66	
Total Postage and Fees $	$8.56	10/20/2023

083-000-023-025 172-R CAMELOT DR

[redacted]

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City, State, ZIP+4®

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MANOMET MA 02345

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$	$3.55	
Extra Services & Fees (check box, add fee as appropriate)		
☐ Return Receipt (hardcopy)	$ $0.00	Postmark Here
☐ Return Receipt (electronic)	$ $0.00	
☐ Certified Mail Restricted Delivery	$ $0.00	
☐ Adult Signature Required	$ $0.00	
☐ Adult Signature Restricted Delivery	$	
Postage $	$0.66	
Total Postage and Fees $	$8.56	10/20/2023

083-000-023-033 0 CAMELOT DR

[redacted]

Sent To

Street and Apt. No., or PO Box No.

City, State, ZIP+4®

26 COURT ST

PLYMOUTH MA 02360

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7022 1670 0003 2992 6433

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Plymouth, MA 02360

OFFICIAL USE

Certified Mail Fee	$4.35	0324 03
$	$3.55	
Extra Services & Fees (check box, add fee as appropriate)		
☐ Return Receipt (hardcopy)	$ $0.00	Postmark Here
☐ Return Receipt (electronic)	$ $0.00	
☐ Certified Mail Restricted Delivery	$ $0.00	
☐ Adult Signature Required	$ $0.00	
☐ Adult Signature Restricted Delivery	$	
Postage $	$0.66	
Total Postage and Fees $	$8.56	10/20/2023

083-000-023-038A 21ROBERT J WAY, Unit A

[redacted]

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Street and Apt. No., or PO Box No.

City, State, ZIP+4®

21 ROBERT J WAY

PLYMOUTH MA 02360

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

2992 6426

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$3.55

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$ $3.55

Extra Services & Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) $ $0.00
- ☐ Return Receipt (electronic) $ $0.00
- ☐ Certified Mail Restricted Delivery $ $0.00
- ☐ Adult Signature Required $ $0.00
- ☐ Adult Signature Restricted Delivery $

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Postage $0.66

Total Postage $8.56

10/20/2023

Sent To
083-000-023-038C 21ROBERTJ WAY, Unit C
TWENTY ONE ROBERT J WAY LLC
21 ROBERT J WAY
PLYMOUTH MA 02360

Street and Apt.
City, State, ZIP

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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Certified Mail Fee $4.35

$ $3.55

Extra Services & Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) $ $0.00
- ☐ Return Receipt (electronic) $ $0.00
- ☐ Certified Mail Restricted Delivery $ $0.00
- ☐ Adult Signature Required $ $0.00
- ☐ Adult Signature Restricted Delivery $

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Postmark Here

Postage $0.66

Total Postage $8.56

10/20/2023

Sent To
083-023-037-001 27 ROBERT J WAY
FURNACE BROOK LLC
27 ROBERTJ WAY
PLYMOUTH MA 02360

Street and Apt.
City, State, ZIP

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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New York, NY 10017

OFFICIAL USE

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$ $3.55

Extra Services & Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) $ $0.00
- ☐ Return Receipt (electronic) $ $0.00
- ☐ Certified Mail Restricted Delivery $ $0.00
- ☐ Adult Signature Required $ $0.00
- ☐ Adult Signature Restricted Delivery $

0324
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Postmark Here

Postage $0.66

Total Postage $8.56

10/20/2023

Sent To
083-000-023-039 15 ROBERT J WAY
[redacted]
777 THIRD AV 26TH FL
NEW YORK NY 10017

Street and Apt.
City, State, ZIP

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$ $3.55

Extra Services & Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) $ $0.00
- ☐ Return Receipt (electronic) $ $0.00
- ☐ Certified Mail Restricted Delivery $ $0.00
- ☐ Adult Signature Required $ $0.00
- ☐ Adult Signature Restricted Delivery $

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Postmark Here

Postage $0.66

Total Postage $8.5

10/20/2023

Sent To
083-023-037-002 27 ROBERT J WAY
[redacted]
27 ROBERTJ WAY
PLYMOUTH MA 02360

Street and Apt.
City, State, ZIP

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

7022 1670 0003 2992

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Plymouth, MA 02360

OFFICIAL USE

Certified Mail Fee $4.35

$ $3.55

Extra Services & Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) $ $0.00
- ☐ Return Receipt (electronic) $ $0.00
- ☐ Certified Mail Restricted Delivery $ $0.00
- ☐ Adult Signature Required $ $0.00
- ☐ Adult Signature Restricted Delivery $

0324
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Postmark Here

Postage $0.66

Total Postage $8.56

10/20/2023

Sent To
083-000-023-052 CAMELOT DR
[redacted]
106 CAMELOT DR PLYMOUTH MA 02360

Street and Apt.
City, State, ZIP

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

7022 1670 0003 2992 6389

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Plymouth, MA 02360

OFFICIAL USE

Certified Mail Fee $4.35

$ $3.55

Extra Services & Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) $ $0.00
- ☐ Return Receipt (electronic) $ $0.00
- ☐ Certified Mail Restricted Delivery $ $0.00
- ☐ Adult Signature Required $ $0.00
- ☐ Adult Signature Restricted Delivery $

0324
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Postmark Here

Postage $0.66

Total Postage $8.

10/20/2023

Sent To
083-000-023-060 CAMELOT DR
[redacted]
130 CAMELOT DR STE 2
PLYMOUTH MA 02360

Street and Apt.
City, State, ZIP

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

HIDDEN WONDERS, LLC

PLAN TO POSITIVELY IMPACT
AREAS OF DISPROPORTIONATE IMPACT

Introduction:

Hidden Wonders, LLC ("HW") proposed location is 27 Robert J. Way, Plymouth, Massachusetts.

Impact Groups:

Hidden Wonders intends to implement programs that assist past or present residents of Brockton, Taunton, Fall River, New Bedford and Wareham. As noted above, these cities and towns are areas of disproportionate impact and therefore this targeted group complies with the requirements of the Cannabis Control Law.

Goals:

HW' goals are as follows:

a. to give hiring preferences to present and past Brockton, Taunton, Fall River, New Bedford and Wareham residents and make the entry to the cannabis industry more accessible;
b. make monetary donations to charities that service the communities of Brockton, Taunton, Fall River, New Bedford and Wareham, as described later in this plan.

Programs:

Hidden Wonder has developed specific programs to employ its goals and positively impact the communities set forth above. Programs include but will not be limited to:

1. Remain focused on hiring employees from the Cities of Brockton, Taunton, Fall River, Ne Bedford or Taunton and Town of Wareham.
2. Hosting at least two (2) career fairs throughout the year in either the above communities to meet HW' goals and to promote access to the cannabis industry.
3. Making monetary donations to HW' charitable partners. Planned charitable partnerships and annual

donation amounts are described below:

a. **The Matthew Mission Food Pantry**. The food pantry is open every Saturday morning, and welcomes all area residents. The pantry serves all comers with bags of nonperishable food. Although we started small in September of 2021, we have now given out over 5,000 bags of groceries. As it turns out the census track in the center of Taunton (track # 6138) has a median income of only $32,000. Even though it may sound odd, I tell people that we are ideally located as a food pantry. Last Saturday we had 81guests. We now average over 230 guests per month. Matthew Mission Food Panty is located in Taunton, Massachusetts. Minimum Annual donation: $1,500.00.

b. **Growthways, Inc.** (http://growthways.org/), 41 North Pearl Street, Brockton, is a non-profit charitable organization whose mission is to provide community-integrated programs for adults with intellectual and developmental disabilities. Hidden Wonder's support will help Growthways continue to provide quality services that support and empower the people it serves, so that they can become valued, contributing members of their community. Growthways provides education, training, advocacy, and support services to adults with intellectual disabilities in the Greater Brockton Area. Their approach is to see each person as an individual and to assist them in having the best quality of life possible. Growthways is committed to provide high quality progressive supports in a home environment. The organization strives to educate and assist not only individuals and their families, but also the surrounding community, so that the people it serves can live as independently as possible and be valued members of their community. Minimum Annual donation: $1,500.00.

Measurements:

Hidden Wonder's CEO will measure this plan's goals bi-annually to ensure the organization is on track to meet its goals. HW is aware that an audit of the Plan's progress will be submitted to the CCC upon renewal.

a. HW will document its employment practices, including the number of such employees hired, retained and promoted that are past or present residents of the above Cities and Town. HW's goal is to hire at least 15% of its employees from those locations. At the end of the calendar year, if HW has not met plan goals, it will continue to refine its plan in order to meet plan goals the following year.

b. HW will provide documentation concerning donations.

<u>Acknowledgements</u>

HW acknowledges and is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment; and (2) Any actions taken, or programs instituted, will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

Please see the following partnership attachments.

Get Connected
GW
Stay Connected

GROWTHWAYS, INC.
Community Supports for People with Developmental Disabilities
41 N. Pearl Street, Brockton, MA 02301 (508) 941-6505 fax 583-7651

Paul Merian
Hidden Wonders LLC
5 Robert J Way
Plymouth MA

September 26, 2023

Dear Mr. Merian,

Please accept this as evidence of our willingness to accept donations from your organization, and of my thanks for supporting Growthways and the people we serve. Your willingness to make contributions helps us to continue our mission of providing quality community services.

You may know that Growthways, Inc. is a tax exempt non-profit that exists solely to provide services to people with intellectual and developmental disabilities. Therefore, in accordance with the 501c3 section of the Internal Revenue Code on public charities, any contributions made to us are eligible to be claimed as deductions on your income tax return.

Again, thank you. Your support is greatly appreciated.

Sincerely,

Marty Berliner
President & CEO

Matthew Mission Food Pantry

When I was hungry, you gave....

Scott Rubin esq.
71 Legion parkway 3rd floor
Brockton MA 02301

RE: Hidden Wonders

Dear Mr. Rubin,

Thank you for your interest in The Matthew Mission Food Pantry. The food pantry is open every Saturday morning, and welcomes all area residents. The pantry serves all comers with bags of nonperishable food. Although we started small in September of 2021, we have now given out over 5,000 bags of groceries. As it turns out the census track in the center of Taunton (track # 6138) has a median income of only $32,000. Even though it may sound odd, I tell people that we are ideally located as a food pantry. Last Saturday we had 81guests. We now average over 230 guests per month.

We welcome your inquiry on behalf of Hidden Wonders. We welcome support from all civic minded organizations and would be happy to welcome you as a supporting partner.

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We are a nonprofit (ID # 92-2248932) and all your donations will be fully tax deductible. We are an all-volunteer organization with no paid staff, so your entire donation will be expended on food.

Thank you for your consideration. Feel free to look into our web site at Matthewmissionfoodpantry.org if you require additional information.

Normand Grenier
Director, Matthew Mission Food Pantry

Po box 614 76 Church Green
Taunton Ma 02780

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

William Francis Galvin
Secretary of the Commonwealth

September 26, 2023

TO WHOM IT MAY CONCERN:

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

HIDDEN WONDERS, LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **March 23, 2023.**

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

I also certify that the names of all managers listed in the most recent filing are: **NONE**

I further certify, the names of all persons authorized to execute documents filed with this office and listed in the most recent filing are: **PAUL B. MERIAN**

The names of all persons authorized to act with respect to real property listed in the most recent filing are: **PAUL B. MERIAN**

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:HN

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: 001645746

1. The exact name of the limited liability company is: HIDDEN WONDERS, LLC

2a. Location of its principal office:
No. and Street: 20 BASSETT ROAD
City or Town: BROCKTON State: MA Zip: 02301 Country: USA

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

No. and Street: 20 BASSETT ROAD
City or Town: BROCKTON State: MA Zip: 02301 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:
RETAIL STORE AND TO ENGAGE IN ANY ACTIVITIES DIRECTLY OR INDIRECTLY RELATED OR INCIDENTAL THERETO AND TO ENGAGE IN ANY OTHER ACTIVITY IN WHICH A LIMITED LIABILITY COMPANY ORGANIZED UNDER THE LAWS OF THE COMMONWEALTH OF MASSACHUSETTS MAY LAWFULLY ENGAGE.

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:
Name: PAUL B. MERIAN
No. and Street: 20 BASSETT ROAD
City or Town: BROCKTON State: MA Zip: 02301 Country: USA

I, PAUL B. MERIAN 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

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

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

SOC SIGNATORY	PAUL B. MERIAN	20 BASSETT ROAD BROCKTON, MA 02301 USA

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
REAL PROPERTY	PAUL B. MERIAN	20 BASSETT ROAD BROCKTON, MA 02301 USA

9. Additional matters:

SIGNED UNDER THE PENALTIES OF PERJURY, this 23 Day of March, 2023,
PAUL B. MERIAN
(The certificate must be signed by the person forming the LLC.)

THE COMMONWEALTH OF MASSACHUSETTS

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

March 23, 2023 05:27 PM

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

HIDDEN WONDERS, LLC

<u>OPERATING AGREEMENT</u>

This Operating Agreement of **Hidden Wonders, LLC** (the "LLC"), dated as of 23rd day of March, 2023 is made by **Paul B. Merian** (collectively, the "Members," and individually, a "Member"). The Members, intending to form a limited liability company pursuant to the Massachusetts Limited Liability Company Act (the "Act"), hereby agree as follows:

1. Name of LLC. The name of the LLC is **Hidden Wonders, LLC** (the "LLC").

2. Business of LLC; Purposes and Powers.

(a) The general character of the business of the LLC is to engage in retail sales and to engage in any other activity in which a limited liability company organized under the laws of the commonwealth of Massachusetts may lawfully engage.

(b) The LLC shall be member-managed. All decisions respecting any matter set forth herein or otherwise affecting or arising out of the conduct of the business of the LLC shall be made by the Members, by action of a majority in number thereof, unless pursuant to this Agreement, the Act or other applicable law, a greater number or percentage of Members is required.

The Members shall have the exclusive right and full authority to manage, conduct and operate the LLC's business. Specifically, but not by way of limitation, the Members shall be authorized, for and on behalf of the LLC to do the following:

(i) to borrow money, to issue evidences of indebtedness and to guarantee the debts of others for whatever purposes they may specify, whether or not related to the LLC or the LLC's assets, and, as security therefor, to mortgage, pledge or otherwise encumber the assets of the LLC;

(ii) to cause to be paid on or before the due date thereof all amounts due and payable by the LLC to any person or entity;

(iii) to employ such agents, employees, managers, accountants, attorneys, consultants and other persons necessary or appropriate to carry out the business and affairs of the LLC, whether or not any such persons so employed are Members or are affiliated or related to any Member; and to pay such fees, expenses, salaries, wages and other compensation to such persons as the Members shall in their sole discretion determine;

(iv) to pay, extend, renew, modify, adjust, submit to arbitration, prosecute, defend or compromise, upon such terms as they may determine and upon such evidence as they may deem sufficient, any obligation, suit, liability, cause of action or claim, including taxes, either in favor of or against the LLC;

(v) to pay any and all fees and to make any and all expenditures that the Members, in their discretion, deem necessary or appropriate in connection with the organization of the LLC, and the carrying out of its obligations and responsibilities under this or any other Agreement;

(vi) to cause the LLC's property to be maintained and operated in a manner that satisfies in all respects the obligations imposed with respect to such maintenance and operation by law, by any mortgages encumbering such property from time to time, and by any lease, agreement or rental arrangement pertaining to such property;

(vii) to cause necessary and proper repairs to be made, and supplies necessary for the proper operation, maintenance and repair of the LLC's property to be obtained;

(viii) to lease, sell, finance or refinance all or any portion of the LLC's property; and

(ix) to exercise all powers and authority granted by the Act to Members, except as otherwise specifically provided in this Agreement.

3. Office of the Limited Liability Company. The address of the office of the LLC for purposes of Section 5 of the Act is **20 Bassett Road, Brockton, MA 02301**.

4. Agent for Service of Process. The name and address of the resident agent for service of process for the LLC is Paul B. Merian, 20 Bassett Road, Brockton, MA 02301.

5. Members' Names and Business Addresses. The names and business addresses of the Members are set forth on Schedule A attached hereto.

6. Term of the LLC.

(a) The term of the LLC commenced upon filing on the date hereof a Certificate of Organization in the Office of the Secretary of State of the Commonwealth of Massachusetts. The term shall continue until the LLC is terminated by agreement of the Members unless earlier dissolved upon the occurrence of an event of dissolution under Section 43 of the Act (subject to the right to continue the LLC as set forth in Section 6(b) below or pursuant to the Act).

(b) The Members may continue the business of the LLC upon the occurrence of any event that constitutes an event of dissolution of an LLC under the Act by electing to do so within 90 days after the occurrence of any of such event. Any such election shall be made by Members whose capital contributions to the LLC represent at least a majority of the capital contributions made by all Members.

7. Capital Contributions, Capital Accounts and Liability of Members.

(a) Each Member has contributed in cash to the capital of the LLC the amount set forth opposite such Member's name on Schedule A hereto. Additional capital contributions may be made by any Member if agreed to by all Members.

Except as otherwise provided in this Section 7, no Member shall be obligated or permitted to contribute any additional capital to the LLC. No interest shall accrue on any contributions to the capital of the LLC, and no Member shall have the right to withdraw or be repaid any capital contributed by it or to receive any other payment in respect of its interest in the LLC, including, without limitation, as a result of the withdrawal or resignation of such Member from the LLC, except as specifically provided in this Agreement.

(b) A "Capital Account" shall be maintained for each Member and adjusted in accordance with Regulations under Section 704 of the Internal Revenue Code of 1986, as amended (the "Code"). To the extent consistent with such Regulations, the adjustments to such Capital Accounts shall include the following: (i) there shall be credited to each Member's Capital Account the amount of any cash or the net fair market value of any property actually contributed by such Member to the capital of the LLC and such Member's share of the net profits of the LLC and of any items in the nature of income or gain separately allocated to the Members; and (ii) there shall be charged against each Member's Capital Account the amount of any cash and the net fair market value of any property distributed to such Member and such Member's share of the net losses of the LLC and of any items in the nature of losses or deductions separately allocated to the Members.

(c) The liability of the Members for the losses, debts and obligations of the LLC shall be limited to their capital contributions; provided, however, that under applicable law, the Members may under certain circumstances be liable to the LLC to the extent of previous distributions made to them in the event that the LLC does not have sufficient assets to discharge its liabilities. Without limiting the foregoing, (i) no Member, in his, her or its capacity as a Member shall have any liability to restore any negative balance in his, her or its Capital Account and (ii) the failure of the LLC to observe any formalities or requirements relating to exercise of its powers or management of its business or affairs under this Agreement or the Act shall not be grounds for imposing personal liability on the Members or Managers for liabilities of the LLC.

8. Return of Contributions. The contribution of each Member is to be returned to such Member only upon the termination and liquidation of the LLC, but contributions may be returned prior to such time if agreed upon by all Members.

9. Share of Net Profits, Net Losses and Cash Distributions.

(a) During the term of the LLC, the net cash flow, net proceeds of any sale or refinancing of any property of the LLC, and any other distributions of cash or other property of the LLC, shall be allocated among the Members in proportion to their respective capital contributions. Subject to the foregoing, distributions to the Members shall be made at such times and in such amounts as the Members shall determine.

Distributions of net proceeds of liquidation of the LLC (whether of cash or other assets) shall be distributed to all Members with positive Capital Account balances (after such balances have been adjusted to reflect the allocation of net profits or net losses and items thereof through the date of liquidation pursuant to Section 9(b)) in proportion to and to the extent of such positive balances.

A Member, regardless of the nature of such Member's contribution to the LLC, shall have no right to demand or receive any distribution from the LLC in any form other than cash. The LLC may, at any time, and from time to time, make distributions in kind to the Members. If any assets of the LLC are distributed in kind, such assets shall be distributed on the basis of their fair market value as determined by the Members.

(b) Net profits and net losses shall, for both accounting and tax purposes, be net profits and net losses as determined for purposes of adjusting Capital Account balances as provided in Treasury Regulations Section 1.704–1(b)(2)(iv)(b). Net profits and net losses of the LLC shall be allocated among the members in proportion to their respective capital contributions. For tax purposes, all items of depreciation, gain, loss, deduction or credit shall be determined in accordance with the Treasury Regulations under I.R.C. § 704(b), and, except to the extent otherwise required by the Code, allocated to and among the Members in the same percentages in which the Members share in net profits and net losses.

(c) **Paul B. Merian** shall be the "tax matters partner" of the LLC for purposes of the Code.

(d) No Member shall have any right to distributions respecting such Member's interest (upon withdrawal or resignation from the LLC or otherwise) except as expressly set forth in this Agreement.

10. Substitution and Assignment of a Member's Interest; Resignation; Additional Members.

(a) No Member may sell, assign, give, pledge, hypothecate, encumber or otherwise transfer, including, without limitation, any assignment or transfer by operation of law or by order of court, such Member's interest in the LLC or any part thereof, or in all or any part of the assets of the LLC, without the unanimous written consent of all of the other Members, and any purported assignment without such consent shall be null and void and of no effect whatsoever.

(b) No assignee of the interest of a Member may be substituted as a member of the LLC without the unanimous written consent of all other Members.

(c) A Member may not resign from or otherwise terminate such Member's membership in the LLC without the prior approval of all other Members.

(d) Additional Members may be admitted to the LLC if agreed to by all Members.

11. Miscellaneous.

(a) The Members shall cause the LLC to keep just and true books of account with respect to the operations of the LLC. Such books shall be maintained at the principal place of business of the LLC, or at such other place as the Members shall determine, and all Members, and their duly authorized representatives, shall at all reasonable times have access to such books.

(b) Such books shall be kept on the accrual method of accounting or on such other method of accounting as the Members may from time to time determine, and shall be closed and balanced as of December 31 each year. The same method of accounting shall be used for both LLC accounting and tax purposes. The fiscal year of the LLC shall be the calendar year.

(c) If and when the LLC has any cash receipts or expenses, the Members shall cause the LLC to maintain one or more accounts in a bank (or banks) that is a member of the Federal Deposit Insurance Corporation (FDIC), which accounts shall be used for the payment of the expenditures incurred by the Members in connection with the business of the LLC, and in which shall be deposited any and all cash receipts. All such amounts shall be and remain the property of the LLC, and shall be received, held and disbursed by the Members for the purposes specified in this Agreement.

(d) Subject to the restrictions on transfers set forth herein, this Agreement, and each and every provision hereof, shall be binding upon and shall inure to the benefit of the Members, their respective successors, successors in title, heirs and assigns, and each and every successor in interest to any Member, whether such successor acquires such interest by way of gift, purchase, foreclosure or any other method, and each party shall hold such interest subject to all of the terms and provisions of this Agreement.

(e) No change, modification or amendment of this Agreement shall be valid or binding unless such change, modification or amendment shall be in writing and duly executed by all of the Members.

(f) This Agreement and the rights and obligations of the parties hereunder shall be governed by and interpreted, construed and enforced in accordance with the laws of the Commonwealth of Massachusetts.

(g) This Agreement may be executed in a number of counterparts, all of which together shall for all purposes constitute one Agreement, binding on all the Members, notwithstanding that all Members have not signed the same counterpart.

(h) None of the provisions of this Agreement shall be for the benefit of or enforceable by any creditor of any Member, or any creditor of the LLC other than a member who is such a creditor of the LLC.

(i) The Members hereby agree that no Member or any successor in interest to any Member shall have the right while this Agreement remains in effect to have the property of the LLC partitioned, or to file a complaint or institute any proceeding at law or in equity to have the property of the LLC partitioned, and that each Member, on behalf of such Member and such Member's successors, representatives, heirs and assigns, hereby waives any such right. It is the intention of the Members that during the term of this Agreement, the rights of the Members and their successors in interest, as among themselves, shall be governed by the terms of this Agreement, and that the right of any Member or successor in interest to assign, transfer, sell or otherwise dispose of his or her interest in the LLC shall be subject to the limitations and restrictions of this Agreement.

(j) This Agreement constitutes the full and complete agreement of the parties hereto with respect to the subject matter hereof.

In Witness Whereof, the Members have signed and sworn to this Agreement under penalties of perjury as of the date first above written.

Member:

By: Paul B. Merian ____________________

Paul B. Merian

Schedule A To Operating Agreement

Members

Names and Addresses of Members	**Capital Contribution**
Paul B. Merian 20 Bassett Road Brockton, MA 02301	$1,000.00

AFFIDAVIT

HIDDEN WONDERS, LLC

I, Paul B. Merian, hereby state under oath depose and state as follows:

1. I contacted the Company's accountant who advised the Department of Unemployment Assistance advised a certificate of good standing is unavailable until such time as an entity registers with the Department of Unemployment and generates a tax liability and makes payments.

2. To date Hidden Wonders, LLC has no present employees and therefore is unable to obtain a certificate of good standing at this time.

Signed, under the pains and penalties of perjury this 23rd day of October, 2023.

Paul B. Merian

Paul B. Merian

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

mass.gov/dor

Letter ID: L1434969888
Notice Date: November 14, 2023
Case ID: 0-002-242-738

CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE

000076

HIDDEN WONDERS LLC
20 BASSETT RD # BROCKTON
BROCKTON MA 02301-4102

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, HIDDEN WONDERS 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, 9:00 a.m. to 4:00 p.m..

Visit us online!

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

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

Edward W. Coyle, Jr., Chief
Collections Bureau

Hidden Wonders, LLC

Business Plan
May 9, 2023

Objective:

Hidden Wonders, LLC objective is to provide a unique, safe, and curated experience for the consumer with a sophisticated marketing and branding strategy, specifically designed for the Town of Plymouth. Our design and retail concept takes into account the surrounding area, traffic flow, safety, and physical location of the storefront to blend in naturally with the Town, the adjacent shopping mall (The Grove at Plymouth) and its environment. Hidden Wonders, LLC will implement its established practice of seamlessly integrating into the community by incorporating the Town's aesthetic touches and maintaining the grandeur of the Town's historic ambiance, and ultimately its traditions.

Ownership/Management Team:

Hidden Wonders, LLC organizational structure is arranged so that the ownership and management team is involved in every aspect of day-to-day operations in order to maintain oversight, provide leadership, and ensure compliance. It is imperative that owners actively participate in the business operations in order to build trust and unity within the team, and promote team culture, which minimizes personnel issues. This is not just a philosophy but implemented on a daily basis.

Hidden Wonders, LLC believes that daily oversight and active management are essential to a successful cannabis operation. To accomplish those goals, our facility will either have the Owner, an Owner's representative or General Manager on site at all times so that they are actively involved in the business operations. Hidden Wonders, LLC believes in leading by example and institutes that philosophy by having the owner at the facility as often as possible, to ensure maximum compliance and adherence to Hidden Wonders, LLC ideals and applicable law. The cannabis industry is substantially based on compliance and ownership realizes its involvement on a daily basis is the most effective way to accomplish a seamless adherence to company policies.

In addition to ownership maintaining a physical office at the facility, ownership will conduct a weekly meeting with floor leads and managers. The owners believe in being on the floor, and in the mix, with the staff, in order to provide consistent structure and leadership. The meetings are mandatory, and the owner keeps the agenda consistent, as follows: Compliance, Product – what's working/what's not; pricing, Customer Feedback, Marketing, Security, Industry/vendor updates, Staff issues/concerns, Action items for the week. In addition to the weekly manager and floor lead meetings, Hidden Wonders, LLC owner/managers will conduct monthly one-on-one meetings with every single staff member across all levels, from reception through management. We believe that communication and feedback are essential to upholding the high morale in the office and promoting teamwork, which contributes to continually improving and scaling the business.

All decisions that relate to compliance, cash management, staffing, and product purchasing are expressly reserved for owners/managers at our retail dispensary. This structure provides consistency and visibility to the owner/managers across the organization. Rigorous standard operating procedures are the crux of a successful and compliant cannabis business and Hidden Wonders, LLC believes that the way to consistently implement and maintain such procedures is by gaining the staff's vested interest, which is the reason why we will staff owners/managers at our facility.

Bio's

Paul Merian

Is the sole owner of Hidden Wonders, LLC. Mr. Merian is currently one of the principals of Hyecorp, LLC d/b/a Green4all, a retail dispensary located in Brockton, Massachusetts. Green4all commenced operations in May, 2021. Mr. Merian is the on-site owner representative full-time. Mr. Merian will utilize his experience in operating the Brockton location to develop the Plymouth site and implement strategies to improve the layout, hire employs willing to work in the industry, deliver a first class customer experience, provide a product mix to meet customer demand and deliver on its state and town obligations to operate a compliant cannabis operation.

Prior to establishing Green4all Mr. Merian owned and operated with his brother John, Tuxedos by Merian located in downtown Brockton, Massachusetts. Tuxedos by Merian is a 3rd generation (1951) provider of formalwear clothing both in the rental and retail channels. They also offer uniforms for school choirs, waiters and waitresses and bartenders. Tuxedos by Merian stands alone in providing the highest quality products and its dedication to customer service. Mr. Merian also served on the Zoning Board of Appeals and license commission for the City of Brockton. As a member of the license commission, Mr. Merian had oversight of Used and New Car Licenses, and all restaurant and Liquor licenses. Mr. Merian has an excellent reputation as a business owner and leader in the City of Brockton and will lend his vast business and regulatory experience to the Plymouth operations.

Business Plan:

Standard Operating Procedures:

Hidden Wonders, LLC has developed and implemented Standard Operating Procedures for every aspect of the retail dispensary, based on its years of experience. We provide several of the major SOP's below as examples of the attention to detail spent in standardizing the processes for all staff and clearly communicating those key policies. Owners and managers repeat the importance of the SOP's and integrate the processes into the daily workflow of all staff. SOPs are stored in a shared google drive for easy access to all staff and are circulated regularly to remind staff of its contents.

Listed below are some key documented standard operating procedures Hidden Wonders, LLC will implement in its operations, which have proven successful to efficient business operations, maintaining safety and security, and ensuring compliance with the law.

SOP 1 – License/HCA posting requirements
SOP 2 – Access to Retail Premises – 21 & over
SOP 3 – Limited-Access Areas
SOP 4 – Personnel Policies
SOP 5 – Security Plan
SOP 6 – Cash Handling
SOP 7 – Diversity Plan
SOP 8 – Financial Records
SOP 9 – Inventory
SOP 10 – Waste Management Plan
SOP 11 – Recordkeeping
SOP 12 – Obtaining Marijuana
SOP 13 – Energy
SOP 14 – Dispensing
SOP 15 – Record Keeping
SOP 18 – Storage
SOP 19 – Quality Control and Testing

Financial Plan:

Initial start-up expenses for the Plymouth store are budgeted to be approximately $1.5 million. This amount includes $200,000 for initial inventory and working capital. The bulk of the start-up costs will be interior and exterior improvements to the real estate in Plymouth, opening inventory, employee hiring and training costs, marketing, and equipment and furniture purchases. The foregoing start-up expenditures include capital improvements, furnishings, and equipment purchases related to the real estate on which the licensed premises will be located. Hidden Wonders, LLC plans to undertake the following capital improvements to the real property:

- Core and shell of existing real property

- Landscaping and exterior beautification services, including trimming and reviving of existing plants and trees and installment of new native plantings and tress
- Re-pave and stripe of parking lot, if any; contribution of capital towards developing additional parking as needed
- Restore site plan to existing, previously approved footprint to ensure permeability per the Select Boards Request
- Repair sidewalk, walkways, and other concrete on property
- Improvements to retail cannabis store interior, including new drywall, electrical systems, HVAC systems, and plumbing
- Installation of walkways, bathrooms, water fountains, and other ADA requirements
- Replacement of all lighting fixtures, indoor and outdoor
- Design and Installation of air cleaner system, carbon filters, can-fan exhaust system, and other preventative measures for odor management plan
- Installation of new commercial locks
- Installation of new commercial steel doors with non-residential hardware
- Design and installation of required surveillance systems
- Design and installation of alarm system
- Design and construct lockable, enclosed dumpster area for all waste disposal
- Design, construct, and install new signs
- Construct vault room, install safes, and bolt to floor

Recordkeeping:

Hidden Wonders, LLC shall keep accurate records of commercial cannabis activity and shall maintain such records in electronic format for a period of no less than seven (7) years. Hidden Wonders, LLC will use a POS system of its choosing that will be an enterprise quality retail management software that manages both inventory and sales transactions. The software platform will be purpose built for the cannabis industry while ensuring constant compliance with state Track-and-Trace systems (METRC). The point-of-sale system shall record evidence of every sale of cannabis or cannabis product via a receipt and record a manifest when accepting inventory from vendors. The receipts and manifests shall be maintained electronically in an on-site server but also be accessible via a cloud server. Electronic invoices shall record evidence of every receipt of transfer of cannabis or cannabis product from a third-party cannabis licensee. Pursuant to applicable law, each sales invoice will include:

- the name, address, and license information of the seller;
- the name, address, and license information of the purchaser;
- the date of sale;
- the invoice number;
- the kind, quantity, size, and capacity of packages of cannabis or cannabis products sold;
- the cost to the purchaser, together with any discounts applied to the price; and
- the place from which transport for the cannabis or cannabis product was made unless transport was made from the premises of the licensee, and any other information specified by the licensing authority.

Employee Training:

Hidden Wonders, LLC employees learn their job duties and industry knowledge through an intensive initial training period which includes ongoing observation, immersion, and examination. This training includes a review of Hidden Wonders, LLC SOPs.

Training involves observing the general operations of the retail store and close interaction with Hidden Wonders, LLC designated New Employee Trainer, from how to prepare the store to open to customer check-in to sales activities to closing procedures. Specific regulatory training from Hidden Wonders, LLC Director of Security and Compliance. Employees are also trained on the more nuanced details, including understanding of the surrounding atmosphere, placement of cannabis displays, customer service tips, sales tactics, and building return customers. Detailed training on the point-of-sale system, the catalog of products and strains for sale at the store, details on what differentiates different products and strains, and recommends hints and mnemonics to encourage familiarity and memorization of all items for sale. Each employee is allowed to work one-on-one with customers under the supervision of a New Employee Trainer and provided the employee demonstrates the required knowledge and understand may graduate to work unsupervised. The employee is elevated from training status and given notice of their future ninety (90)-day review date. In addition to Hidden Wonders, LLC formal onboarding training above, Hidden Wonders, LLC requires its vendors to conduct specialized training for all our staff on their products, including new product releases.

Subject Matter of Employee Training:

- Age Verification Plans
- Varieties of cannabis strains
- Methods of ingesting cannabis
- Types of cannabis goods
- Potency and effects of cannabis and cannabis goods
- Sale limits for cannabis and cannabis goods
- Impaired Customers
- Regulatory and legal updates
- Cash handling protocol
- Track and Trace inputting
- Non-discrimination
- Environmental stewardship
- Pricing, and sales techniques
- Safety and Security
- Emergency Preparedness Plan
- Communication with Employees
- Communication with Customers
- Dealing with Complaints
- Point-of-sale system operations

Customer Education:

Ultimately, it is Hidden Wonders, LLC responsibility to keep its customers safe and informed. In doing so, the dispensary owner/manager shall provide and maintain customer education materials in accordance with local and CCC regulations. All materials must be made available in languages accessible to all customers served by Hidden Wonders, LLC, including for the visually and hearing impaired. The dispensary owner/manager may engage the services of a third-party for translation services. The dispensary owner/manager may also utilize customer education materials with approval from the owner/manager approved sources. All Hidden Wonders, LLC employees are trained in customer education, particularly with respect to the different varieties of cannabis strains and cannabis products. Hidden Wonders, LLC espouses an initiative which 1) identifies first-time consumers of cannabis and then 2) educates those customers and existing customers on THC percentages, potency, and resulting effects. Hidden Wonders, LLC employees are also trained on their ability to educate consumers on the different effects of the varying strains of cannabis carried in the store inventory. Hidden Wonders, LLC will also have on hand and pass out to consumers, the informational materials which are part of a broad cannabis consumer education campaign undertaken by responsible vendors in the cannabis industry. The campaign is modeled after the State of Colorado's "Good to Know" campaign.

Marketing:

Successful marketing for a cannabis store in Plymouth can be divided into four categories: 1) local business-to-business, 2) digital or mobile-device targeted, 3) event-based entertainment and sponsorships, and 4) print-based.

Because of the interconnectivity of businesses and employees in Plymouth, it is imperative that Hidden Wonders, LLC establishes a "good neighbor" relationship with neighboring and area businesses. Employee and membership programs will be offered to neighboring businesses, notably lodging establishments, food and beverage establishments, and the service industry. These types of businesses typically employ local workers and cater to *residents and tourists with expendable income. Digital and mobile-device targeted advertising is important in Plymouth, where individuals are technologically savvy and tethered to their internet devices. Hidden Wonders, LLC will advertise on social media and its website. Its social media will be targeted to individuals at least twenty-one years of age, and its website will contain an age verification feature before anyone can access it. Hidden Wonders, LLC will not engage in printed advertising that tends to turn into litter, including printed handbills or flyers. Neither will Hidden Wonders, LLC engage in outlandish advertising practices like street corner sign-spinners or in-person solicitation. Finally, for certain local Plymouth community events or special business occasions (grand opening, anniversary), Hidden Wonders, LLC shall pursue the procurement of art and music to help create an enjoyable scene for potential customers. By projecting Hidden Wonders, LLC brand on fun, artsy neighborhood events, Hidden Wonders, LLC will establish itself as a caring, engaged member of the business community. Hidden Wonders, LLC is already looking into potential sponsorship opportunities for local city and non-profit events that require business sponsors.*

External signage will only display the Hidden Wonders, LLC name and address to assist customers in locating the business. We will not have any green crosses or pictures of cannabis on the exterior of our retail location as we feel it may detract from the look and feel of the Town of Plymouth. A phone number and website may be displayed to provide a resource for customers to obtain additional information about the store. We will ensure that all cannabis, cannabis products, and associated products are not visible to a person from the exterior of the retail facility and all external signage is in compliance with local restrictions. Finally, we are seeking to engage a Plymouth-based marketing firm to spearhead our marketing efforts for Hidden Wonders, LLC in Plymouth.

Community Benefits:

Hidden Wonders, LLC philosophy is to empower its staff to succeed during employment with Hidden Wonders, LLC and beyond. One-way Hidden Wonders, LLC effectively demonstrates this mission is in its hiring practices. Hidden Wonders, LLC will seek to employ people with cannabis criminal records, or who are in poverty. All Hidden Wonders, LLC employment solicitations encourage people with cannabis criminal records to apply.

Hidden Wonders, LLC Corporate Giving Program is committed to increasing opportunities and improving the quality of life in the communities where we operate. Hidden Wonders, LLC will contribute to many educational and charitable organizations within the Town of Plymouth. Donations are made to non-profit, non-religious, and non-political organizations with an emphasis on diversity and globalization. Through this Program, Hidden Wonders, LLC staff may regularly engage with, and be involved in, local charities and nonprofits.

In addition, Hidden Wonders, LLC will provide the following:

- Marijuana consumption is not allowed in public places. Any customers doing so will be banned from the facility.
- We will not sell products containing nicotine or alcohol.
- Clients visiting the facility for the first time will go through an intake process where they receive handouts on how to safely consume, store, and transport their cannabis purchases.
- Clients that violate the guidelines will be put on notice and banned from utilizing the facility
- Handle and process marijuana in a safe and sanitary manner.
- Properly remove litter and waste to minimize the development of odor and minimize the potential for waste attracting and harboring pests.

Neighborhood Compatibility:

From an architectural perspective we are self-proclaimed urbanists, dare we say preservationists, intent on integrating public policy with architecturally authentic, compassionate, and sustainable urban design. In Plymouth, we seek to operate cannabis retail that is both neighborhood-oriented by servicing surrounding residential households and destination-oriented by attracting visitors from adjacent communities. Consistent with current practice, Hidden Wonders, LLC retail presence will complement non-cannabis retail to not alienate the authentic shopping experience found in Plymouth. Hidden Wonders, LLC seeks to pay homage to Plymouth traditions and preservation of the culture. Inspiration for this concept is also founded in Hidden Wonders, LLC desire to avoid an overtly “cannabis-centric” brand. We want retail shoppers and community members to view our retail impact as the same as other non-cannabis retail concepts in the area. Thus, we've intentionally avoided traditional cannabis-type logos and identifiers, such as "green crosses" and "marijuana leaves" found in many other retail dispensary concepts. Hidden Wonders, LLC aims to blend into the Town of Plymouth while preserving its heritage and traditions.

Security Measures:

It is important to create a warm and inviting environment that integrates well with the Plymouth community. As such, Hidden Wonders, LLC will integrate its security enhancements into the physical design of the retail store with a concerted effort to avoid creating an atmosphere that feels unsafe or in danger.

Where possible, security cameras will be placed in discrete locations. However, it is essential that all camera placement allows for the clear identification of identity of facial features and activity occurring within fifteen feet of all points of ingress and egress. Camera placement allows for the clear and certain identification of any individual and activities on the premises, both day and night. Cameras are strategically located to cover all limited access areas, point-of-sale areas, security rooms, all points of ingress and egress to limited access areas, all areas where cannabis or cannabis product is displayed for sale and all points of ingress and egress to the exterior of the premises. With that said, point-of-sale designated cameras will be placed above registers so that they are not within the eyeline of the general public and egress/ingress cameras will be integrated into the design concept of the entrance/exit. We seek to provide maximum-level security that does not make the consumer or community feel like they are in a war zone or overtly unsafe area.

All video surveillance equipment and security/surveillance records will be housed within the NVR/Security Room. The NVR/Security Room will be a locked, secure room within the limited access area in the store. Access to the NVR/Security Room will be controlled and monitored by the store manager, who shall possess the key to the NVR/Security Room. The NVR/Security room will have a logbook in which managers will manually log in entry and exit times into the NVR/Security Rooms. Only badged employees or government agents accompanied by the store manager or owners will be able to access the NVR/Security Room. The surveillance records and recordings, as well as all documents, information, reports, and records, are open for review by law enforcement. Hidden Wonders, LLC will post signs informing the general public of surveillance cameras and recording systems at its location in such a way to blend with the physical design of the exterior and interior.

The retail space will utilize glass break sensors, magnetic door and window sensors, and motion sensors. These types of mechanisms provide security while remaining concealed from view. Our alarm system covers all facility entrances and exits, rooms with exterior windows, rooms with exterior walls or walls shared with other building tenants, roof hatches, skylights, storage rooms containing safes or vaults, registers, owner/manager's office, and the receiving room. Hidden Wonders, LLC also plans to staff its retail store with licensed security guards to assist with security awareness. Overall, all security measures, though robust and proven, will be generally unnoticeable to a retail customer such that they will have an experience that equates to what he or she could expect when shopping at a boutique department store. We always adhere to an open-door policy, stressing open lines of communication between the company and government officials.

Security Experience:

Hidden Wonders, LLC emphasis on security is an integral part of the success of a retail dispensary. Security begins with the strength of its team and Hidden Wonders, LLC will create a team of experts to craft and implement a sophisticated and detailed security plan that includes not only physical security, but technology and data security as well. We understand the intricacies of physical and data security in cannabis through experience providing ancillary IT and security services to other dispensaries. More specifically, the security plan is designed to deter and prevent (1) unauthorized entrance into areas containing cannabis, (2) the theft or diversion of cannabis, and (3) any potential compliance issues. The team will ensure compliance with local and state security requirements consistent with the governing law.

In addition, an accurate facility security site plan will be maintained, and an annual recurring security system auditing will be conducted. The policies established for Hidden Wonders, LLC will be strictly enforced. These policies include measures to: and will provide the following:

- Develop strong partnerships with local law enforcement agencies;
- Prevent unauthorized or unwanted individuals from accessing or remaining on the premises;
- Maintain 24/7 continuous video recording surveillance with a minimum of 90 days of retention;
- Ensure that limited access to areas is accessible only to authorized personnel; and
- Ensure that all cannabis is stored in a secure, locked safe or vault and in such a manner as to prevent diversion, theft, and loss.

In addition, Hidden Wonders, LLC will implement the following:

- Customers must be above 21 years of age.
- Employees are required to pass a series of state and national background checks all of which are regularly reviewed by state agencies.
- Two-door entry way to ensure only approved persons may enter the facility.
- A description of the Marijuana Establishment's hours of operation and after-hours contact information shall be provided to the Cannabis Control Commission and made available to law enforcement officials.
- Employing a live security guard during dispensary hours or local police detail.
- Utilizing redundant systems that operate even in the instance of a power outage.
- Granting access to video access feeds to local police departments, if warranted.
- Architectural and Operational Security measures address items such as perimeter barriers, lighting, critical building services, spatial adjacencies, control barriers, as well as staff and public access.
- Electronic Security measures address items such as access control and alarm monitoring, video surveillance, and security communications.
- Developing security protocols and systems that exceed the requirements set forth by the Commonwealth of Massachusetts.
- Implementing and patrolling state of the art interior and exterior video surveillance systems, alarms, duress systems, and logging.
- Use of state approved seed to sale tracking system.
- Development of chain of custody policies and procedures approved by the Cannabis Control Commission.
- Anti-diversion training for employees.
- Right to deny sales to any individual.
- Utilization of appropriate packaging and labeling.
- Storage of Marijuana in compliance with 935 CMR 500.105(11).

CPTED (Crime Prevention Through Environmental Design) is a concept that utilizes planned passive resources, such as architectural barriers, landscaping, and lighting to reduce the necessity of traditional technical and operational security elements, to reduce vulnerability to crime. The key concepts of CPTED include:

- Natural Access Control: Use of doors, fences, landscaping, and other man-made and natural obstacles to limit access into the building or other defined interior space.
- Natural Surveillance: Increasing visibility by occupants and observers (security and staff) to increase the detection of unauthorized individuals or misconduct within a facility.
- Natural Boundary Definition: Establishing a sense of ownership by occupants to increase vigilance in identifying intruders. This sends the message that would-be-offenders will be identified.

  The concept of "Concentric Circles of Protection" is based on varying levels of protection originating at the site perimeter, building perimeter, lobby areas, and interior areas with special control requirements, becoming increasingly more stringent as one proceeds through each level to reach the most critical areas. Intervention zones between each layer of the circle provide opportunities for control, detection, evaluation, and response to undesired activity, intruders, or other unauthorized individuals.

The Integrated Design Philosophy establishes effective security through the integration of electronic systems with architectural elements, enhanced by security staff and procedures. When the integration of these elements is effectively executed, a synergy is created that meets the desired security objective. The premise for using this concept is that architectural, operational, and electronic elements must be implemented to complement one another; thereby creating collaboration between them that results in a strong security program. No one element of the group can stand-alone or operate independently and provide adequate protection. Specifics of the elements used include:

- Architectural Security measures address items such as perimeter barriers, lighting, critical building services, spatial adjacencies, and control barriers.
- Operational Security measures address items such as staff and public access control, staffing, monitoring, and administration of systems.
- Electronic Security measures address items such as access control and alarm monitoring, video surveillance, and security communications.

II. Security Measures

Security measures consist of both physical barriers and electronic systems that work in concert to provide a robust security program. These measures include:

- Secure Door and Window Hardware
- Security Mesh
- Primary Intrusion Alarm System
- Backup Intrusion Alarm System
- Video Surveillance System
- Access Control System
- Door Interlock System
- Door Intercom System

Physical Security Measures

Measures will be employed that ensure a secure physical perimeter is provided around the entire tenant space as well as walls surrounding the Secure Storage/Limited Access Area. Where concrete block construction is not used, security mesh and plywood will be utilized to harden ceiling and perimeter walls of the LAA to deter penetration from adjacent space.

Perimeter doors and designated interior doors separating dispensary functions will be provided with locking hardware which will remain secure except when accessed by authorized persons. Perimeter glass for the dispensary is limited to the main entry and exit doors, a Security Room window, and two second floor windows. All perimeter glass will be non-operable and will have laminated glass or security mesh inside to prevent intrusion. A laminated glass transaction window in the Security Room facing the Entry Vestibule will allow security personnel to safely validate persons before they are permitted to enter the Sales Floor.

The side of the facility will be used to access the area for product deliveries.

Intrusion Alarm Systems

Intrusion detection is comprised of two independent commercial-grade alarm systems – a primary and a backup – to ensure any intrusion will be detected and reported should a failure of either system occur. The primary alarm system (PAS) and the backup alarm system (BAS) will be installed, serviced, and monitored by separate security vendors to ensure redundancy. Control equipment for the PAS and BAS will be located in the Security Room, which will have restricted access.

Perimeter detection of an intrusion is provided using door contacts on perimeter doors and glass break detection for perimeter glass. Interior intrusion detection is provided by motion detection throughout the dispensary and in the limited access areas (LAA). In addition to intrusion devices, hold-up/panic alarms will be provided at point-of-sale locations within the sales area, in the Security Room and in the LAA.

The intrusion alarm systems will be controlled by numeric keypad arming stations located inside the main entry and exit doors. Keypads will display system armed/disarmed status, status of security devices and any trouble notifications. Authorized users will be issued unique arm/disarm codes to identify who armed or disarmed the systems at a given time. A special duress alarm code will be provided at each PAS and BAS keypad arming station and have the ability to notify law-enforcement that an authorized user has been forced by an intruder to disarm an alarm system.
The PAS and BAS provide separate detection of intrusion for all perimeter door and window contacts, glass break detectors and motion detectors to ensure a device failure on one system will not compromise intrusion detection by the other.

Video Surveillance System

The video surveillance system (VSS) is comprised of network-based video cameras and network-based head-end equipment for viewing, recording and playback of security video. VSS head-end equipment will be located in the Security Room to ensure access is restricted and limited to the security function. Exterior cameras will be located around the perimeter of the building, at doors and the side driveway area to monitor and record activity around the dispensary tenant space. Interior cameras will be provided in dispensary areas and in the LAA. The system will provide monitoring and recording of all cameras to aid in identifying all who enter or exit the dispensary and areas where controlled products will be stored, processed, handled, and sold. Monitoring and operation of the VSS will be provided in the Security Room.

The VSS will retain camera footage for a minimum of 90 days and retain (at minimum) the last 24 hours for immediate retrieval and playback. The VSS will save or archive video relating to a particular incident under investigation or pending legal/administrative action for as long as necessary and export still images to industry standard formats. Additionally, the VSS will have an uninterruptible power source for continued operation during a power failure should an emergency backup generator be provided for extended backup power.

Access Control System

A proximity card access control system (ACS) will be provided at the perimeter and designated interior doors, including the LAA door, to limit access only to persons issued a valid access card and within their allotted day and time schedule. Each person will be authorized to enter only those doors required in the performance of their duties. Persons accessing the LAA will be required to present a valid access card and enter a unique personally identifiable numeric code before entry is granted. All user activity will be logged by the ACS. Vandalizing or tampering with the ACS card reader on the unsecure side of a door will not unlock the door. The ACS controller will be located in the Security Room and be provided with backup power supply to ensure operation during a power failure in the event an emergency generator is provided for extended backup power.

All authorized personnel will be issued a photo ID badge and an access card for the controlled doors. Personnel names and photos will be printed on the card. All personnel will be required to always wear their photo ID badge while on the premises. The cards will employ contactless smartcard technology with unique card numbers. Only cards programmed into the ACS will work at the dispensary. The manufacturer will track the individual card numbers to ensure card numbers are not duplicated. These card security measures will help ensure that only authorized personnel will have access to the dispensary facility.

The access control system will also include a visitor management function that will record visitors to the dispensary facility, store personal information, and print visitor badges.

Door Intercom/Communication System

An intercom or communication system is provided to allow Security Room personnel to communicate with persons at the Exterior Entry Vestibule door should the door be locked during business hours for any reason. The intercom/commnication system will allow the entry door to be remotely unlocked from the Security Room to allow vetted persons into the Entry Vestibule.

Door Interlock System

An exterior and interior door at entry and exit points of the dispensary form a vestibule which will be configured similar to a mantrap to ensure authorized persons entering or exiting cannot allow an unauthorized person into the dispensary Sales Floor. The interlocked doors are controlled such that only one vestibule door can be opened at a given time. Doors are logically controlled by a controller located in the Security Room. Door release buttons are provided at the reception desk for the entry doors to allow authorized persons to enter the Entry Vestibule, and once verified, will be allowed to enter the Sales Floor.

The exterior entry door is unlocked during business hours to facilitate access into the Entry Area. Once inside the Entry Vestibule, a person must check in at the Security Room transaction window. Once properly vetted, the security officer unlocks the interior Sales Floor door, which interlocks the exterior Entry Vestibule door. When the interior door is closed and locked, the exterior entry door is unlocked. After hours, the exterior Entry Vestibule door is locked by the ACS. The exterior Entry Vestibule door may be locked during business hours for additional security and vetted persons let in via the door intercom system.

When exiting the Sales Floor, a person pushes the exit bar to open the interior Sales Floor exit door. Once inside the Exit Vestibule, the interior Sales Floor door must be closed and secure before the exterior Exit Vestibule door can be opened to exit the building. While the exterior Exit Vestibule door is open, the interior Sales Floor door is interlocked to prevent it from being opened until the outer exit door is closed and secure. Note: The interlock door controls will be overridden as required by life- safety code.

Operational Safety Program

The facility will exceed the State's standards for access control and cameras. There will be no queue line on the street. The Company has designed an internal area for customers to wait to get verified that they are eligible to enter the dispensary. Personnel will verify proof of age as an individual enters the facility. Upon entry the client will proceed to the security window where their ID will be scanned and checked again. Staff will also ensure the person has not previously been prohibited from entry for violation of our good neighbor agreement. Once a person is verified, they will be buzzed through the security door into the sales area. Upon selecting, the client will proceed to the check out where there will be a third verification of the person's ID. Staff will ensure that there is no loitering on the premises or surrounding area.

All finished marijuana products will be stored in a secure, locked safe or vault in such a manner as to prevent diversion, theft, and loss; all safes, vaults, and any other equipment or areas used for the production and storage of marijuana products securely locked and protected from entry, except for the actual time required to remove or replace marijuana.

The Company will ensure all locks and security equipment are good working order and will prohibit keys, if any, from being left in the locks or stored or placed in a location accessible to persons other than specifically authorized personnel. The Company will limit access to combination numbers, passwords or electronic or biometric security systems to specifically authorized personnel.

The Company will ensure that the outside perimeter of the Marijuana Establishment is sufficiently lit to facilitate surveillance, where applicable. The development of emergency policies and procedures for securing all product following any instance of diversion, theft, or loss, of marijuana and conduct an assessment to determine whether additional safeguards are necessary.

Security Related Policies

The Company will develop security-related policies and procedures in a written security manual. At minimum, the manual will include the development of the following policies.

1. Marijuana Product Security
    - Safes and Vaults

- Security Personnel
    - Security Signage
    - Video Image Protection and Retention
    - Exterior Perimeter Lighting
    - Inventory and Disposal
    - Physical and Electronic Security Maintenance
2. Access Control in accordance with
    - Key and Access Code Control
    - Dispensary Facility Access
    - Client Access
    - Staff Only Areas (e.g., Break Room, Safe Room, Receiving area)
    - Security Officer Access (e.g., Security Room)
3. Visitor Management
    - Definition of Authorized Visitor
    - Notification of Visitors in Advance
    - Visitor Identification Badge (creation, display, and return)
    - Visitor Log
    - Emergency Visitation Circumstance
4. Diversion, Theft, and Loss
    - Inventory (security aspects)
    - Identification
    - Reporting/Notification
    - Root Cause Analysis
    - Disposal of Marijuana
5. Alarm Activation, Security Breach, and System Failure
    - Identification
    - Reporting/Notification
    - Root Cause Analysis

The Company will develop policies to include the following security policies for a holistic approach to dispensary facility security:

1. Workplace Violence
2. Trespassing and Loitering
    - Public Notification
    - Response Protocols
3. Evacuation Procedures
4. Sensitive Information Protection
5. Management's Role and Responsibilities
    - Sensitive Information Defined
    - Safeguarding Sensitive Information (e.g., Protected Health Information Credit Card)
    - Document Destruction
    - Clean Desk Policy
6. Staff Security Awareness
    - Management's Role and Responsibilities
    - New Employee Security Orientation
        - How staff contact security
        - What information staff should report to security
        - The importance of displaying and checking identification
        - Procedures for preventing and responding to security breaches
        - Preventing, intervening, reporting, and resolving workplace violence issues
        - Staff role in crime prevention
        - Reporting environmental safety and security issues

    - Personal safety awareness
    - Confidential information and privacy issues
7. On-Going Security Awareness Efforts
    - Security Policies
    - Security Responsibilities
8. Employee Training
    - Cash Handling
    - Acceptance of Cash from Patient
    - Cash Storage
    - Payments with Cash
9. End of Day Checklist
    - Secure Cash, Checks, and Credit Card Slip Storage Areas (i.e., Safe, cash boxes, etc.) or Transfer to Financial Institution
    - Secure All Marijuana Storage Areas
    - Secure All Interior Doors
    - Inspect Restrooms for Unauthorized Persons

Product Delivery

The Company will only accept deliveries from production facilities at pre-arranged days and times and only when a proper shipping manifest has been sent from the production facility to the dispensary at least 24 hours before the delivery.

Deliveries of finished product to the dispensary will occur at the front of the building area through the Secured Receiving section of the dispensary. Only scheduled deliveries will be allowed. When a scheduled delivery vehicle arrives, the driver will contact dispensary and security personnel to meet them at a dedicated front delivery entrance. The driver will remain secure in the vehicle until security and dispensary personnel arrive. Finished products will be secured in locked cases until they are secured in the LAA. Security personnel will monitor the delivery and activity in the surrounding area and street. Should any suspicious activity be identified, security personnel will stop the delivery process, secure any product in the delivery vehicle or in the building as soon as possible. Prior to entry, an employee will let the delivery vehicle personnel into the delivery vestibule and check their department issued identification card before entering the receiving room. There, the product shall be counted and compared to the shipping manifest.

Once approved, the employee shall sign both copies of the shipping manifest and keep one copy. All shipping manifests will be kept in a secure location to be available for inspection. Any returned product or payment will be given to the delivery vehicle personnel and approved appropriately. All received product will immediately be put into a safe in the Safe Room.

The entire product delivery process will be monitored by the Security Officer in the Security Room, and he or she will notify the authorities and respond to the appropriate room if any incidents arise. The delivery vehicle personnel shall not be allowed into the rest of the dispensary facility.

Incident Reporting.

The Company shall notify appropriate law enforcement authorities and the Cannabis Control Commission of any breach of security immediately and in no instance more than 24 hours following discovery of the breach. Notification shall occur during, but not be limited to, the following occasions:

- Discovery of discrepancies identified during inventory;
- Diversion, theft or loss of any marijuana product;
- Any criminal action involving or occurring on or in the Marijuana Establishment premises;
- Any suspicious act involving the sale, cultivation, distribution, processing, or production of marijuana by any person;

- Unauthorized destruction of marijuana;
- Any loss or unauthorized alteration of records related to marijuana;
- Any alarm activation or other event that requires response by public safety personnel or security personnel privately engaged by the Marijuana Establishment;
- The failure of any security alarm system due to a loss of electrical power or mechanical malfunction that is expected to last more than eight hours; or
- Any other breach of security.

The Company shall, within ten calendar days, provide notice to the Cannabis Control Commission of any incident described in 935 CMR 500.110(7)(a) by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified. All documentation related to an incident that is reportable pursuant to 935 CMR500.110(7)(a) shall be maintained by the Company for not less than one year or the duration of an open investigation, whichever is longer, and made available to the Cannabis Control Commission and law enforcement authorities upon request.

Security Audits

The Company will, on an annual basis, obtain at its own expense a security system audit by a vendor approved by the Commission. A report of such audit will be submitted, in a form and manner determined by the Commission, no later than 30 calendar days after the audit is conducted. If the audit identifies concerns related to the establishment's security system, the Company will submit a mitigation plan within ten business days of submitting the audit.

Packaging of Edible Marijuana Products

Any edible marijuana product that is made to resemble a typical food or beverage product will be packaged and labeled as required by M.G.L. c. 94G, § 4(a1⁄2) (xxvi) and 935 CMR 500.105(5). The Company will not offer for sale edibles in the distinct shape of a human, animal, or fruit, or a shape that bears the likeness or contains characteristics of a realistic or fictional human, animal, or fruit, including artistic, caricature, or cartoon renderings. The Company will ensure all edible marijuana products are prepared, handled, and stored in compliance with the requirements in 935 CMR 500.105(3) and 500.105(11).

Per 935 CMR 500.150(3), in addition to the requirements set forth in M.G.L. c. 94G, § 4(a1⁄2)(xxvi) and 935 CMR 500.105(5) and (6), the Company will ensure that the following information or statement is affixed to every container holding an edible marijuana product:

- If the retail edible marijuana product is perishable, a statement that the edible marijuana product must be refrigerated.
- The date on which the edible marijuana product was produced.
- A nutritional fact panel that must be based on the number of THC servings within the container.
- Information regarding the size of each serving for the product by milligrams, the total number of servings of marijuana in the product, and the total amount of active THC in the product by milligrams (mgs). For example: "The serving size of active THC in this product is X mg(s), this product contains X servings of marijuana, and the total amount of active THC in this product is X mg(s)."
- A warning that the impairment effects of edible marijuana may be delayed by two hours or more.

The Company will ensure that each single serving of an edible marijuana product is physically marked in a way that enables a reasonable person to intuitively determine how much of the product constitutes a single serving of active THC. Each serving of an edible marijuana product within a multi-serving package of edible marijuana products will be easily separable in order to allow an average person 21 years of age or older to physically separate, with minimal effort, individual servings of the product.

The Company will not deliver, sell, or otherwise transfer an edible marijuana product with potency levels exceeding the following, as tested by an independent marijuana testing facility licensed in accordance with M.G.L. c. 94G, § 15: for a single serving of an edible marijuana product, five milligrams of active tetrahydrocannabinol (THC); and in a single package of multiple edible marijuana product to be eaten, swallowed, or otherwise ingested, not more than 20 servings or 100 milligrams of active THC. The THC content will be homogenous, or evenly distributed, throughout the edible marijuana product.

The Company will ensure that all products are marked with an easily recognizable mark issued by the Cannabis Control Commission that indicates that the product is harmful to children. In instances where the labeling of the marijuana product is unreasonable or impractical, the Company will include the labeling information on a peel back label or may place the product in a sealed bag with an insert or additional, easily readable label firmly affixed to that bag. The Company will employ tamper or opaque or plain child- resistant packaging as approved by the US Consumer Product Safety Commission per their most recent poison prevention packaging regulations.

The Company will ensure compliance with 935 CMR 500.105 by not utilizing packaging methods below:

1. Using bright colors, defined as colors that are “neon” in appearance;
2. Imitating or having a semblance to any existing branded consumer products, including foods and beverages, that do not contain marijuana;
3. Featuring cartoons;
4. Featuring a design, brand, or name that resembles a non-cannabis consumer product of the type that is typically marketed to minors;
5. Featuring symbols or celebrities that are commonly used to market products to minors;
6. Featuring images of minors; or
7. Featuring words that refer to products that are commonly associated with minors or marketed to minors.

The Company will utilize a Cannabis Control Commission approved seed to sale tracking program to track all product coming into and out of the facility.

Traffic Mitigation: Initial Proposal

The objective at Hidden Wonders, LLC retail dispensary in Plymouth, is to ensure the safety and flow pattern of the surrounding community, customers & patients, and local, neighboring retailers alike. To fully understand and plan for traffic, we must first plan for the unknown with our initial traffic mitigation plan and allow for the opportunity to open the facility and see exactly how customers and patients are behaving. Afterward, addressing the behaviors within a thirty-day (30) window and revising the initial plan (if necessary), will be key to ensuring a safe and welcoming facility for all businesses and customers on Robert J Way.

- When customers leave the facility there will be ample signage inside and outside of the facility addressing a left turn only onto Robert J Way toward Camelot Drive. (*Proof of signage to be provided to Town of Plymouth Planning Board for review prior to install*)
- Hidden Wonders, LLC will write on our website: Please enter from Robert J. Way only. Left turn only upon exiting parking lot.
- We will have a parking lot attendant help guiding traffic in and out informing customers of proper entering and exiting of the facility.
- A police detail will be provided every day for the first 30 days to ensure our traffic plan is being handled and acted upon properly and to prepare for any potential influx of arriving customers.
- Hidden Wonders, LLC will revisit this plan after the first 30 days with local police and the Town of Plymouth, to provide a detailed report of any issues or nonissues that arose. From there, we will devise a new plan, if necessary, that implements new protocols from a different angle to tackle any issues that were present.
- For example:

- Local conversations with other businesses to allow for signage provided by Hidden Wonders, LLC to be placed on their parcels to make incoming and outgoing customers aware of the traffic protocols and directions to be driving in;
- Interior facility signage addressing the traffic mitigation plan;
- Banner posted on our website displaying the means of traffic upon exit of the facility;
- And any further ideas or plans that the Town of Plymouth and local police may provide, and mutually agreed upon with Hidden Wonders, LLC, will be implemented.

Air Quality/Odor Control

Hidden Wonders, LLC will install and utilize a required Air Quality/Odor Control/Filtration system as required by local ordinance and state regulation and will be regularly maintained.

Community Impact

WHAT ARE WE RESPONSIBLE FOR?

- 3% of sales revenue towards Community priorities
- Total tax/fees to Town and State: 23%

HOW WE PLAN TO GO ABOVE & BEYOND

- Commitment to hiring local residents
- Participate in neighborhood civic and business associations
- Robust employee engagement strategy that will support local charities and community building initiatives

Community Benefits

- Job Creation (20 – 25 positions)
- Enhanced Security – In and Outside of facility
- Host Community Agreement with Town of Plymouth
- 3% of gross sales
- Revenue to Town of Plymouth
- 3% sales tax
- Charitable Contributions

Location Overview

- Proposed hours of operation 9am-9pm
- Estimated 30-50 customers per hour
- Average transaction time of 10 minutes per customer
- Accessible for individuals with disabilities
- Ample room for queuing internal to facility

HIDDEN WONDERS, LLC

<u>PLAN FOR LIABILITY INSURANCE</u>

I. Insurance

No later than at the commencement of operations Hidden Wonders, LLC. will have and maintain a policies of insurance requiring the following coverage and limits: general liability and products liability of no less than $1,000,000 per occurrence and $2,000,0000 in aggregate annually and such deductible on this policy shall be no higher than $5,000 per occurrence. 935 CMR 500.101(1); 935 CMR 500.105(10).

HIDDEN WONDERS, LLC

POLICY

CONCERNING

QUALIFICATIONS

AND TRAINING

Qualifications and Training

Hidden Wonders ("HW") only hires Staff who comport with HW's background check. HW's staff meet minimum age requirements of being twenty-one (21) years of age or older and have completed and shall maintain Responsible Vendor Training Program certification, all as promulgated by the Commission under 935 CMR 500.105(2)(b).

HW requires that all Staff shall, at a minimum, receive eight (8) hours of on-going training each year.

HW policy requires that all new employees involved in the handling and sale of cannabis for adult use shall successfully complete a Responsible Vendor Program within ninety (90) days of hire.

HW maintains records of responsible vendor training program compliance for four (4) years and can make them available to inspection by the Commission and any other applicable licensing authority upon request during normal business hours.

All HW staff will have a working knowledge of the related cannabis law, rules and regulations, including local regulations. Managers (assistant and supervisor level) will be responsible for ensuring all HW Staff follow such obligations.

HW will employ a Compliance Officer who will oversee hiring and training of all Staff and will conduct periodic compliance checks to ensure Staff has retained such knowledge.

Managers and the Compliance Officer are expected to have some post high school education. Staff are expected to have attained a high school diploma or its equivalent.

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

HW will also ensure that all of its employees are suitable for registration consistent with the provisions of 935 CMR 500.802.

Marijuana Establishment Agent Training

(a) Marijuana Establishments shall ensure that all marijuana establishment agents complete training prior to performing job functions. Training shall be tailored to the roles and responsibilities of the job function of each marijuana establishment agent, and at a minimum must include a Responsible Vendor Program under 935 CMR 500.105(2)(b). At a minimum, staff shall receive eight (8) hours of on-going training annually.

Responsible Vendor Training

1. On or after July 1, 2019, all current owners, managers and employees of a Marijuana Establishment that are involved in the handling and sale of marijuana for adult use at the time of licensure or renewal of licensure, as applicable, shall have attended and successfully completed a responsible vendor program to be designated a "responsible vendor."
2. Once a licensee is designated a "responsible vendor," all new employees involved in the handling and sale of marijuana for adult use shall successfully complete a responsible vendor program within ninety (90) days of hire.
3. After initial successful completion of a responsible vendor program, each owner, manager, and employee involved in the handling and sale of marijuana for adult use shall successfully complete the program once every year thereafter to maintain designation as a "responsible vendor."
4. Administrative employees who do not handle or sell marijuana may take the "responsible vendor" program on a voluntary basis.
5. Marijuana establishments must maintain records of responsible vendor training program compliance for four (4) years and make them available to inspection by the Commission and any other applicable licensing authority upon request during normal business hours.

Certification Training Program Standards

a. No owner or employee of a responsible vendor program shall have an interest in a licensed Marijuana Establishment;
b. Program providers shall submit their programs to the Commission every two years for approval as a responsible vendor program;
c. The program shall include at least two (2) hours of instruction time;
d. The program shall be taught in a real-time, interactive classroom setting where the instructor is able to verify the identification of each individual attending the program and certify completion of the program by the individual identified;
e. The program provider shall maintain its training records at its principal place of business during the applicable year and for the following three (3) years;
f. The provider shall make the records available for inspection by the Commission and any other applicable licensing authority upon request during normal business hours;
g. The program shall provide written documentation of attendance and successful passage of a test on the knowledge of the required curriculum for each attendee;
h. Attendees who can speak and write English must successfully pass a written test with a score of 70% or better;
i. Attendees who cannot speak or write English may be offered a verbal test, provided that the same questions are given as are on the written test and the results of the verbal test are documented with a passing score of 70% or better; and
j. Program providers shall solicit effectiveness evaluations from individuals who have completed their program. Certification Training Class Core Curriculum.

a. Discussion concerning marijuana's effect on the human body. Training shall include:
    i. Marijuana's physical effects based on type of marijuana product;
    ii. The amount of time to feel impairment;
    iii. Visible signs of impairment; and
    iv. Recognizing the signs of impairment.

b. Diversion prevention and prevention of sales to minors, including best practices;

c. Compliance with all tracking requirements; and

d. Acceptable forms of identification. Training shall include:

- i. How to check identification;
- ii. Spotting false identification;
- iii. Medical registration cards issued by the DPH;
- iv. Provisions for confiscating fraudulent identifications; and
- v. Common mistakes made in verification.

e. Other key state laws and rules affecting owners, managers, and employees, which shall include:

- i. Local and state licensing and enforcement;
- ii. Incident and notification requirements;
- iii. Administrative and criminal liability;
- iv. License sanctions and court sanctions;
- v. Waste disposal;
- vi. Health and safety standards;
- vii. Patrons prohibited from bringing marijuana onto licensed premises;
- viii. Permitted hours of sale;
- ix. Conduct of establishment;
- x. Permitting inspections by state and local licensing and enforcement authorities;
- xi. Licensee responsibilities for activities occurring within licensed premises;
- xii. Maintenance of records;
- xiii. Privacy issues; and
- xix. Prohibited purchases and practices.

f. Such other areas of training determined by the Commission to be included in a responsible vendor training program.

HIDDEN WONDERS, LLC

POLICY CONCERNING QUALITY CONTROL AND TESTING

Quality Control and Testing

Hidden Wonders does not sell any marijuana and marijuana products unless that marijuana or marijuana product has passed testing, and Hidden Wonders keeps a record of test results for each batch of marijuana and marijuana products.

Hidden Wonders inspects all marijuana and marijuana products for any sign of contamination. Any marijuana that appears contaminated is REJECTED by Hidden Wonders and RETURNED to the vendor – regardless of testing results. Hidden Wonders understands that vendors can cheat on the
tests, and accordingly, Hidden Wonders's first line of defense is a visual inspection.

Hidden Wonders only purchase from trusted vendors, and from vendors who strictly comply with the regulations pertaining to testing of marijuana and marijuana product.

Hidden Wonders ensures that all marijuana product, including marijuana, offered for sale or otherwise marketed for adult use has been tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

Hidden Wonders maintains a Test Log for all marijuana product, including marijuana, offered for sale or otherwise marketed for adult use by Hidden Wonders.

The Test Log and Hidden Wonders's policy describes the acceptable contaminant levels established in the DPH protocols identified in 935 CMR 500.160(1).

Hidden Wonders's policy requires that the Commission is notified within seventy-two (72) hours of any laboratory testing results indicating that contamination cannot be remediated, and Hidden Wonders requires disposing of the contaminated marijuana product.

Hidden Wonders's policy recognizes that the notification to the Commission must come from Hidden Wonders AND from both the Independent Testing Laboratory, separately and directly. Hidden Wonders understands that the notification from Hidden Wonders must describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

Hidden Wonders maintains all test records and the Test Log for no less than one (1) year.

In addition, Hidden Wonders establishes the additional policies and procedures concerning Quality Control and Testing Procedures:

To the extent Hidden Wonders receives marijuana product requiring further processing and packaging Hidden Wonders shall only utilize the leaves and flowers of the female marijuana plant to be processed accordingly in a safe and sanitary manner in that all product shall be:

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

Hidden Wonders requires all agents whose job includes contact with marijuana be compliant with the requirements for food handlers specified in 105 CMR 300.000.

Hidden Wonders's policy requires any agent working in direct contact with marijuana shall conform to sanitary practices while on duty, including:

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

Hidden Wonders supervisors shall ensure all agents are properly trained and monitored for compliance with all such requirements.

Hidden Wonders's dispensary shall have hand-washing facilities located in production areas and where good sanitary practices require employees to wash and sanitize their hands. HW will work with the local board of health and CCC for proper placement of such facilities.

Hidden Wonders's policy requires it shall always provide sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations.

Hidden Wonders's waste disposal policy requires all litter and waste shall be properly removed in appropriate bins who are located so as to minimize the development of odor and the potential for the waste attracting and harboring pests.

Hidden Wonders's facility shall be constructed in such a manner that they may be adequately kept clean and in good repair, this includes all flooring, walls, and ceilings.

Hidden Wonders's policy requires all contact surfaces, shall be maintained, cleaned, and sanitized as frequently as necessary to protect against contamination. Hidden Wonders will maintain a log ensuring proper opening and closing procedures and daily maintenance to ensure all such surfaces are properly maintained and cleaned.

Hidden Wonders's policy maintains that all toxic items shall be identified, held, stored and disposed of in a manner that protects against contamination of marijuana.

Hidden Wonders's proposed location has sufficient water supply for necessary operations but hereby establishes a policy that the water supply shall be maintained such that it will always be sufficient for operations.

Hidden Wonders's policy ensures that the plumbing equipment will be of adequate size and design and maintained to carry sufficient quantities of water to required locations throughout the establishment. Hidden Wonders will maintain a maintenance log of inspections and repairs completed to the plumbing service to ensure the system is maintained as required.

Hidden Wonders's policy requires it provide and maintain for its employees adequate and readily accessible toilet facilities. Such facilities are part of the proposed location's final plans.

Hidden Wonders's policy requires the storage and transportation of finished products to be held and maintained under conditions that protect them against physical, chemical, and microbial contamination.

HIDDEN WONDERS, LLC

PLAN TO

POSITIVELY IMPACT

AN AREA OF DISPROPORTIONATE IMPACT

Introduction
Hidden Wonders, LLC ("HW") proposed location is 27 Robert J. Way, Unit 1, Plymouth. While Plymouth is not an area of disproportionate impact, Brockton, Taunton, Fall River, and New Beford are designated as areas of disproportionate impact per the most recent Massachusetts Cannabis Control Commission's latest Guidance.

Impact Groups
HW intends to implement programs to assist past or present Brockton, Taunton, Fall River and New Bedford residents as well as Massachusetts residents who have prior marijuana convictions, and residents with parents or spouses who have prior marijuana convictions. As noted above, Taunton, Brockton, Fall River and New Bedford are areas of disproportionate impact and therefore this targeted group complies with the requirements of the Cannabis Control Law.

Goals
HW's goals are as follows:

a. to give hiring preferences to present and past Brockton, Taunton, Fall River and New Bedford residents and make the entry to the cannabis industry in Taunton more accessible;
b. run at least two (2) fundraisers and/or make monetary donations in of the following Brockton, Taunton, Fall River or New Bedford or to donate to charities based or serving these communities.

Programs
HW has developed specific programs to employ its goals and positively impact the Brockton, Taunton, Fall River, and New Bedford community. Programs include but will not be limited to:

1. Remain focused on hiring from the Cities of Taunton/Brockton/Fall River/New Bedford.
2. Hosting at least 2 career fairs throughout the year in Taunton/Brockton/Fall River/New Bedford to meet HW's goals and to promote access to the cannabis industry. Monthly advertisement in local newspapers promoting HW's hiring practices. This includes hiring Taunton/Brockton/Fall River/New Bedford residents and those with prior marijuana convictions.
3. Conducting fundraisers and/or make monetary donations to charities focus on the Cities of Brockton, Taunton, Fall River and New Bedford annually. Planned partnerships are with:

   a. **Growthways, Inc.** (http://growthways.org/), 41 North Pearl Street, Brockton, is a non-profit charitable organization whose mission is to provide community-integrated programs for adults with intellectual and developmental disabilities. Green Star's support will help Growthways continue to provide quality services that support and empower the people it serves, so that they can become valued, contributing members of their community. Growthways provides education, training, advocacy, and support services to adults with intellectual disabilities in the Greater Brockton Area. Their approach is to see each person as an individual and to assist them in having the best quality of life possible. Growthways is committed to provide high quality progressive supports in a home environment. The organization strives to educate and assist not only individuals and their families, but also the surrounding community, so that the people it serves can live as independently as possible and be valued members of their community. Minimum Annual donation: $1,500.00.

b. ***Gandara Center.*** ***Founded in 1977 to advocate and provide for equal services in the Hispanic community, Gándara Center delivers quality bilingual behavioral health, substance use and preventative services for a diverse clientele of nearly15,000 children, adults and families each year in 100 locations across Massachusetts. Minimum Annual Donation:*** $750.00

Measurements:

Hidden Wonders's Manager will measure this plan's goals bi-annually to ensure the organization is on track to meet its goals. HW is aware that an audit of the Plan's progress will be submitted to the CCC upon license renewal.

a. HW will document its employment practices, including the number of such employees hired, retained and promoted that are past or present City of Taunton/Brockton/Fall River/New Bedford residents. HW's goal is to hire at least 15% of its employees from the City of Taunton/Brockton/Fall River/New Bedford. At the end of the calendar year, if HW has not met plan goals, it will donate $1,500 to the Social Equity Training and Technical Assistance Fund and will continue to refine its plan in order to meet plan goals the following year.

b. HW will provide documentation concerning fundraising activities, donations and volunteer hours for participation in the various fundraisers and programs it assists. HW will implement a matching program for employees who wish to donate their time or funds towards any charitable endeavor, particularly those organizations referenced above.

Acknowledgements:

HW acknowledges and is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment; and (2) Any actions taken, or programs instituted, will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

HIDDEN WONDERS, LLC

DISPENSING PROCEDURES

Hidden Wonders will assure dispensary procedures meet or exceed all Cannabis Control Commission regulations per 935 CMR 500: Adult use of Marijuana.

1. Verification of Age Requirement

Pursuant to 935 CMR 500.105 and 500.140, upon entry into the premises of HW by an individual, a HW marijuana establishment agent will immediately inspect the individual's proof of identification and determine the individual's age. An individual will not be admitted to the premises unless it has been verified that they are 21 years old or older.

Hidden Wonders will refuse to sell marijuana to any consumer who is unable to produce valid proof of identification.

2. Limitation on Sales and Right to Refuse.

Once inside the retail area, customers will enter a queue to obtain individualized service where they may select any of the products available to them with the help of a Hidden Wonders agent.

Hidden Wonders only displays cannabis and cannabis product, in secure, locked cases. Hidden Wonders's display cases are transparent, and a Hidden Wonders Staff member may remove a sample of cannabis from the case and provide it to the consumer for inspection, provided the consumer may not consume or otherwise use the sample.

Upon checkout, customers will be required to confirm their identities and age a second time. Check out also activates the seed-to-sale tracking system that is compliant with 935 CMR 500.140(2).

Per M.G.L. c. 94G § 7, sales are limited to one (1) ounce of cannabis flower or five (5) grams of cannabis concentrate per transaction. All required taxes will be collected at the point of sale. Once a customer has selected a product for purchase, a Hidden Wonders agent will collect the chosen items from the designated product storage area. All products for purchase will be packaged and labeled pursuant to 935 CMR 500.105. A Hidden Wonders agent will then scan each product barcode into the point of sale system.

In the event a HW agent determines an individual would place themselves or the public at risk, the agent will refuse to sell any cannabis products to the consumer. HW will utilize separate accounting practices at the point of sale to track marijuana product sales and non-marijuana sales.

Hidden Wonders will, to the best of its ability, not let customers purchase amounts that would conflict with the customer's ability to stay within the regulations for marijuana or MIPs on hand. Hidden Wonders will ensure that all bags are protected with a tamper proof seal so that a customer cannot consume products in their car or in public. Hidden Wonders will ensure that no customer is consuming any product in their car while on Hidden Wonders property. Any car or visitor that is idling in the parking lot after visiting the store will be asked to leave the parking lot. This is for the safety our employees as well as other guests.

If the seal is broken and the customer is in an incident involving cannabis and cannabis related products, Hidden Wonders is not responsible for the customer's actions. Hidden Wonders will always try to be knowledgeable of car limits and the possibility of customers traveling in the same car. Always observe customers social interactions in the store and be wary of their purchases. If anything is suspicious, contact the MoD for back-up/clarification.

Hidden Wonders will refuse to sell marijuana products to a consumer if, in the opinion of the marijuana establishment agent based on the information available to the agent at that time, the consumer or the public would be placed at risk. Hidden Wonders will not sell marijuana products containing nicotine or alcohol, if such alcohol would require licensure pursuant to M.G.L. c. 138.

HW places a premium on cleanliness, hygiene, and proper product storage to achieve and maintain successful operation of the business. In addition to regularly sanitizing surfaces with products kept separately and away from cannabis products, HW staff will ensure personal hygiene, including washing hands throughout the day.

HW policy requires that all Staff dispensing cannabis are trained to follow the sanitary requirements outlined below:

1. All Staff whose job includes contact with cannabis or nonedible cannabis products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements;

2. All Staff working in direct contact with preparation of cannabis or nonedible cannabis products shall conform to sanitary practices while on duty, including:
   a. Maintaining adequate personal cleanliness; and
   b. Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.

All products available for sale and consumption will be tested for impurities and subjected to HW'S policies governing quality control per 935 CMR 500.105.

3. Recording Sales.
Hidden Wonders will only utilize a point-of-sale system approved by the Commission, in consultation with the DOR. Hidden Wonders will utilize a sales recording module approved by the DOR.

All Hidden Wonders employees are prohibited from utilizing software or other methods to manipulate or alter sales data. Hidden Wonders will conduct a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. Hidden Wonders will maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If Hidden Wonders 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 Hidden Wonders will immediately disclose the information to the Commission and cooperate with any investigation regarding manipulation or alteration of sales data. Hidden Wonders will take actions directed by the Commission. In addition to complying with 935 CMR 500: Adult use of Marijuana Hidden Wonders will comply with 830 CMR 62C.25.1: *Record Retention* and DOR Directive 16-1 regarding recordkeeping requirements. Hidden Wonders will adopt separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales.

At any time, Hidden Wonders authorizes the Commission and the DOR to audit and examine the point-of-sale system used to ensure compliance with Massachusetts tax laws and 935 CMR 500.000.

4. Consumer Education – Hidden Wonders will make available, and maintain an adequate supply of, educational materials about marijuana products to consumers. Educational materials will be available in commonly spoken languages designated by the Commission, which will include, but not be limited to appropriate materials for the visually- and hearing-impaired. Such materials will be made available for inspection by the Commission upon request.

The educational material will include at least the following:

- A warning that marijuana has not been analyzed or approved by the FDA, that there is limited information on side effects, that there may be health risks associated with using marijuana, and that it should be kept away from children;
- A warning that when under the influence of marijuana, driving is prohibited by M.G.L. c. 90, § 24, and machinery should not be operated;
- Information to assist in the selection of marijuana, describing the potential differing effects of various strains of marijuana, as well as various forms and routes of administration;
- Materials offered to consumers to enable them to track the strains used and their associated effects;
- Information describing proper dosage and titration for different routes of administration. Emphasis will be on using the smallest amount possible to achieve the desired effect. The impact of potency must also be explained;
- A discussion of tolerance, dependence, and withdrawal;
- Facts regarding substance abuse signs and symptoms, as well as referral information for substance abuse treatment programs;
- A statement that consumers may not sell marijuana to any other individual;
- Information regarding penalties for possession or distribution of marijuana in violation of Massachusetts law;
- Any other information required by the Commission.

<u>5. Packaging of Marijuana and Marijuana Products</u>.
Hidden Wonders will ensure that all marijuana products that are provided for direct sale to consumers will be sold in tamper or child-resistant packaging.

Hidden Wonders will ensure that to the extent it is not unreasonably impracticable for the specific type of product, marijuana products are packaged in containers that are opaque or plain in design; resealable for any marijuana product intended for more than a single use or containing multiple servings; and certified by a qualified third-party tamper or child-resistant packaging testing firm that the packaging is in compliance with the most recent poison prevention packaging regulations of the US Consumer Product Safety Commission as included at 16 CFR 1700; or that where compliance with the requirements of tamper or child-resistant packaging is deemed to be unreasonably impracticable, marijuana products will be placed in an exit package that is:

- capable of being resealed and made tamper or child-resistant resistant again after it has been opened;
- includes the following statement, including capitalization, in at least ten-point Times New Roman, Helvetica or Arial font: KEEP OUT OF REACH OF CHILDREN; and
- is certified by a qualified third-party tamper or child-resistant packaging testing firm that the packaging is in compliance with the most recent poison prevention packaging regulations of the US Consumer Product Safety Commission as included at 16 CFR 1700.

Hidden Wonders will assure that packaging for marijuana products sold or displayed for consumers, including any label or imprint affixed to any packaging containing marijuana products or any exit packages, will not be attractive minors. Hidden Wonders packaging will ***<u>not</u>***:
use

- bright neon colors
- imitate or having a semblance to any existing branded consumer products, including foods and beverages, that do not contain marijuana;
- featuring cartoons;
- featuring a design, brand or name that resembles a non-cannabis consumer product of the type that is typically marketed to minors;
- featuring symbols or celebrities that are commonly used to market products to minors;
- featuring images of minors; or

- featuring words that refer to products that are commonly associated with minors or marketed to minors.

Hidden Wonders packaging for marijuana products sold or displayed for consumers in multiple servings will include the following statement on the exterior of the package in a printed font that is no smaller than ten-point Times New Roman, Helvetica or Arial, including capitalization: “INCLUDES MULTIPLE SERVINGS.”

Each single serving of an edible marijuana product contained in a multiple-serving package will be marked, stamped or otherwise imprinted with the symbol issued by the Commission under 935 CMR 500.105(5) that indicates that the single serving is a marijuana product.
No individual serving size of any marijuana product will contain more than five milligrams of delta-nine-tetrahydrocannabinol, excluding flower and vape pen cartridges.

Hidden Wonders, LLC

PLAN FOR

OBTAINING MARIJUANA OR MARIJUANA PRODUCTS

Plan for Obtaining Marijuana Products

Hidden Wonders ("HW") expects it will partner with locally sourced producers as Hidden Wonders's Host Community Agreement incentivizes such sourcing in Plymouth and surrounding communities at the commencement of operations. However, HW's principal also operates a retail location in Brockton and will leverage such knowledge to source product beneficial to Plymouth market.

Currently there is an abundance of licensed cultivators providing sufficient supply throughout the South Coast for HW to obtain product from at the time of commencement of operations.

HW will ensure that all marijuana and marijuana products purchased from licensed marijuana cultivators and product manufacturers are in compliance with 935 CMR 500.160(9), requiring marijuana and marijuana products be tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160 prior to the sale or marketing for adult use of any such marijuana or marijuana product.

HIDDEN WONDERS, LLC

POLICY CONCERNING

MAINTENANCE OF FINANCIAL RECORDS

Maintenance of Financial Records

Hidden Wonders ("HW") maintains all records onsite, available for inspection by the Commission, upon request.

HW's records are maintained in accordance with generally accepted accounting principles.

Hidden Wonders maintains all Business Records required in any section of 935 CMR 500.000, in addition to the following which shall include manual or computerized records of:

Written business records, available for inspection, and in accordance with generally accepted accounting principles, which will include manual or computerized records of:

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

Cash management will be developed within the Security Plan and shall remain confidential to HW's management and staff. Frequency and timing of cash deposits to be made to financial institutions shall be randomized for security purposes.

Seed to sale tracking systems as approved by the Commission shall be implemented which will support HW's payment of state and local sales tax and other obligations.

HW's confidential information will be kept in a secure location, separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the Commission may access this information to carry out its official duties.

All sales recording requirements under 935 CMR 500.140(6) are followed, including:

- Utilizing a point-of-sale (POS) system approved by the Commission, in consultation with the DOR, and a sales recording module approved by DOR;
- Conducting a monthly analysis of its equipment and sales date, and maintaining records, available to the Commission upon request, that the monthly analysis has been performed;
- Complying with 830 CMR 62C.25.1: *Record Retention* and DOR Directive 16-1 regarding recordkeeping requirements;
- Adopting separate accounting practices at the point-of-sale for cannabis and cannabis product sales, and non-cannabis sales; and

- Maintaining such records that would allow for the Commission and the DOR to audit and examine the point-of-sale system used in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.

Additional written business records will be kept, including, but not limited to, records of:

- Compliance with liability insurance coverage or maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16); and
- Fines or penalties, if any, paid under 935 CMR 500.550 or any other section of the Commission's regulations.

HIDDEN WONDERS, LLC

OPERATIONS PROCEDURE ON ENERGY COMPLIANCE

Overview

Hidden Wonders("HW") will employ various strategies to reduce energy consumption where available and in compliance with CCC regulations.

HW will employ a Compliance Officer to review energy consumption on a quarterly basis. HW's Compliance Officer will report such findings in monthly team meetings with management and staff and discuss existing energy usage and ways to reduce energy usage. Managers and staff will be trained to report to the Compliance Officer any strategies developed to reduce energy usage and the Compliance Officer and the Management shall be responsible to approve and implement such strategies.

In the event the facility requires any further upgrades, renovations or expansions, HW will hire the necessary design, construction and engineering professionals to identify potential energy savings opportunities and implement such opportunities as available and cost effective. HW policy requires HW to identify and document any renewable or alternative energy opportunities as part of any upgrades, renovations or expansions.

In the event of an equipment failure requiring replacement, HW policy requires a review by HW's Compliance Officer and management to identify and document potential energy savings available prior to replacement. HW will maintain documentation energy savings was considered and information justifying the final decision concerning such replacement.

Within the first 12 months of operation and no less than annually thereafter, HW will document its 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 and its consideration of energy supply decisions and regularly (no less than annually) evaluate renewable options;

HW's Compliance Officer shall conduct an ongoing review of HW's energy demand and report to management any inefficiencies in current energy usage identified and to research solutions to reduce electric demand (such as lighting schedules, active load management, and energy storage); The Compliance Officer shall implement a method of energy monitoring and reporting to management and in consultation with management to implement such adjustments to operations based on such compiled data; The Compliance Office shall review and implement procedures for participation in load curtailment, energy storage, or other active demand management programs (as applicable). As part of such reviews and reporting, the Compliance Officer shall communicate with existing and proposed utilities to identify and implement any available energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants. The Compliance Officer shall provide a quarterly report to management regarding his/her research of available programs.

HIDDEN WONDERS, LLC

POLICY CONCERNING

INVENTORY PROCEDURES AND POLICIES

INVENTORY Procedures and Policies

Hidden Wonders("HW") tracks all of its cannabis and cannabis products using mandated seed to sale tracking as approved by the Commission. HW will maintain real-time inventory in compliance with 935 CMR 500.105(8), including maintaining inventory of cannabis ready for dispensing; all cannabis products; and all damaged, defective, expired, or contaminated cannabis and cannabis products awaiting disposal.

Hidden Wonders employs inventory controls and procedures for the conduct of inventory reviews, and HW conducts regular comprehensive physical inventories of cannabis and cannabis products and all of HW's stored cannabis and cannabis products. In addition, Hidden Wonders reconciles its regulatory tracking information with the physical inventory and also cross reconciles physical inventory with point of sale records.

HW's management will arrange for an inventory delivery and notify security of the date and time of the delivery. Only management and restricted staff may accept delivery of product. Deliveries to HW are limited to the rear door on the opposite side of the customer and employee entrance. HW will randomize the date and times of deliveries and will only take deliveries when safe to do so. Deliveries shall be completed in full view of the security system. The amount, weight and product type will be document on inventory control systems. If all product is acceptable and in order product will be delivered to the inventory room and delivered to the product vault in the safe room. At the same time the product will be entered into the METRC system. Hidden Wonders inventory staff will ensure all cannabis and cannabis product placed into inventory has been properly tested according to the rules promulgated by the Commission, except as allowed under 935 CMR 500.000. All cannabis and cannabis product that is placed into HW's inventory has PASSED TESTING.

Hidden Wonders ensures that each inventory includes, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory. Hidden Wonders policy is to immediately transcribe any inventories if taken by an oral recording device.

HW will only use the approved METRC system for inventory control and shall ensure all tags, bar codes and labels shall remain legible and affixed to the product.

If HW is breaking down product and packing, HW policy requires and all handling employees shall be trained on the proper used of the METRC system and shall ensure the tagging and labeling of all products always complies with the regulatory requirements.

HW staff will reject any product in a delivery that does not meet the requirements of proper packaging and testing and shall be removed from inventory and the source shall be notified.

HW conducts a monthly physical inventory of its on-hand cannabis and cannabis product.
Hidden Wonders conducts an annual inventory of its on-hand cannabis and cannabis product on HW's annual inventory date. HW's annual inventory date will be the date that HW first opens for retail sales and then that date thereafter.

During inventory, all product must be counted and weighed under camera. Any time there is an error or inaccuracy in inventory there is a potential for diversion. Recount inventory in question by hand and have a second agent count again. If both agents' numbers are the same and there is appears to be missing product contact Security and MoD immediately inform MoD and Security of amount projected to be missing, the form the product is in, all times and places the product was weighted and accounted for, and the last official point the inventory was verified. Security and MoD will begin by looking over all documentation and security footage. After review of security and inventory reports MoD and Security will issue a report of findings a corrective action may be initiated at the same time as MoD and Security is beginning their review or after depending on the circumstance. A corrective action must be performed any time there is a discrepancy in inventory management or controls.

Any diversion, theft, or loss must be documented and immediately reported to the appropriate law enforcement authorities and regulatory authorities. A complete inventory audit must be performed for the diverted, stolen, or lost product and every movement the product made up to the point of the discrepancy. This report will be used as a tool in assisting with the continued investigation and may not be destroyed for 3 years.

HIDDEN WONDERS, LLC

POLICY CONCERNING
RECORD KEEPING PROCEDURES

Record Keeping Procedures

Hidden Wonders's ("HW") policies and procedures for recordkeeping and record retention will comply with all CCC regulations to safeguard and maintain vital documents. Upon request or by audit, the Company will provide written records to the CCC. Under supervision of the Chief Compliance Officer, working with the HR Manager and Inventory Manager, HW will file records in a secure, limited access area.

HW will employ a quarterly review of all retained records to ensure compliance. This review will include corporate, employee and business documents.

Under direct supervision of the Chief Compliance Officer, the procedures will also be kept current and internally inspected by the executive management team as a part of Hidden Wonders's overall facility maintenance, conducted annually.

Corporate Records
Corporate records are defined as records that require, at a minimum, regularly scheduled annual reviews, updates, and renewals. These records include the Cannabis Control Commission's annual compliance requirements for marijuana establishment registration, agent registration, and employee background check documentation. Hidden Wonders will comply with all corporate governance requirements: Secretary of State filings and annual reports. HW will ensure its business operations with polices for general liability, directors & officers (D&O), product liability, workers compensation, employer professional liability and umbrella coverage. Hidden Wonders's host community local compliance will include any and all variances, as-built drawings, site plan approvals, special permits and certificate of occupancy.

HW will maintain all records required in any section of 935 CMR 500.000, in addition to the following: Written operating procedures as required by 935 CMR 500.105(1); inventory records as required by 935 CMR 500.105(8); and seed-to-sale tracking records for all cannabis products as required by 935 CMR 500.105(8)(e).

Personnel Records
HW will maintain detailed personnel records, which will include the following:

- Job descriptions for each employee and volunteer position, along with organizational charts consistent with the job descriptions;
- A personnel record for each HW Staff member. These records will be maintained by HW for at least twelve (12) months after termination of the individual's affiliation with HW and shall include, at a minimum, the following:
    - o all materials submitted to the Commission pursuant to 935 CMR 500.030(2);
    - o the job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision for that position;
    - o documentation of periodic, regular performance evaluations;
    - o documentation of verification of references;
    - o 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;
    - a record of any disciplinary action taken; and
    - notice of completed responsible vendor and eight (8) hour related duty training.

HW maintains a staffing plan that demonstrates accessible business hours and safe working conditions.

HW maintains personnel policies and procedures; and all background check reports obtained in accordance with 935 CMR 500.030.

Business Records
HW will maintain detailed Business Records, which shall include electronic or hard copies of, at a minimum:
- Salary and wages paid to each employee, any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with any HW vendors, including members, if any;
- Assets and liabilities;
- Books of accounts, which shall include ledgers, journals, and supporting documents, invoices, checks, agreements, and vouchers;
- Monetary transactions;
- Sales records including the quantity, form, and cost of cannabis products; and
- Waste disposal records as required under 935 CMR 500.105(12).

Handling and Testing of Marijuana Records
HW will maintain the results of all cannabis testing a minimum of one (1) year.

Inventory Records
HW's record of each inventory will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the agents who conducted the inventory.

Seed-to-Sale Tracking Records
- HW will use seed to sale software to maintain real-time inventory. HW's seed-to-sale inventory reporting will meet the requirements specified by the Commission and 935 CMR 500.105(8)(c) and (d), including, at a minimum, an inventory of all cannabis and cannabis-related products ready for dispensing; as well as all damaged, defective, expired, or contaminated cannabis and cannabis products awaiting disposal.
- Inventory records will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory.

Incident Reporting Records
- Within ten (10) calendar days, HW will provide written notice to the Commission of any incident described in 935 CMR 500.110(7)(a). HW will do this by submitting an incident report, detailing the incident, the investigation, the findings, resolution (if any),

confirmation that the Police Department and Commission were notified within twenty- four (24) hours of discovering the breach, along with any other relevant information.

Visitor Records
All visitors must be logged in and out and that log shall be available for inspection by the Commission at all times. A visitor sign-in and sign-out record will be maintained at the security office. The record will include the visitor's name, address, organization or firm, date, time in and out, and the name of the authorized agent who will be accompanying the visitor.

Security Records
- HW will make a current list of authorized agents and service personnel that have access to the surveillance room available to the Commission upon request.
- HW will make available for immediate viewing by the Commission upon request all twenty-four (24) hour recordings from all video cameras that are kept for a minimum of ninety (90) calendar days.

Transportation Records
HW will retain all shipping manifests for no less than one (1) year. These records will be made available to the Commission upon request.

Agent Training Records
Documentation of all required training, including training regarding privacy and confidentiality requirements, and a signed statement of the individual indicating the date, time, and location where they were trained, the topics discussed and the name(s) and title(s) of the presenter(s).

Records Closure Policy
In the event HW closes its operations, all records will be kept for at least two (2) years at HW's expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission.
In addition, the Company will communicate with the CCC during the closure process and accommodate any additional requests the CCC or other agencies may have.

Policies and Procedures Records
Written Operating Policies and Procedures: Policies and Procedures related to the Company's operations will be updated on an ongoing basis as needed and undergo an annual review by the executive management team. Policies and Procedures include the following:
- A list of all executives of the Company, and members, if any, of the licensee must be made available upon request by any individual. 935 CMR 500.105(1)(m) requirement may be fulfilled by placing this information on the Company's website;
- Description of the various strains of marijuana to be cultivated, sold, or processed, as applicable, as well as the form(s) in which marijuana will be dispensed;
- A staffing records and staffing plan in compliance with 935 CMR 500.105(9);

- A description of the Company's hours of operation and after-hours contact information, which will be provided to the CCC, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000;
- Policies and procedures for the handling of cash on Company premises including but not limited to storage, collection frequency and transport to financial institution(s);
- Storage of marijuana in compliance with 935 CMR 500.105(11);
- Agent security policies, including crime prevention and personal safety techniques;5o Security measures in compliance with 935 CMR 500.110;
- Policies and procedures to prevent the diversion of marijuana to individuals younger than twenty-one (21) years old;
- Policies for an alcohol, smoke, and drug-free workplace;
- Quality control plans, including product testing for contaminants in compliance with 935 CMR 500.160;
- Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.160;
- Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
- A plan describing how confidential information will be maintained; and
- Policy for the immediate dismissal of any dispensary agent who has:
    - Been convicted, 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;
    - Diverted marijuana, which will be reported the Police Department and to the CCC; or
    - Engaged in unsafe practices with regard to Company operations, which will be reported to the CCC.

Record Retention
As a retailer, HW will comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements.

Personnel Policies, Including Background Checks
HW will maintain personnel records as a separate category of records due to the sensitivity and importance of information concerning agents, including registration status and background check records. HW will keep, at a minimum, the following personnel records:

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

For more detailed information about HW's personnel policies, including procedures related to background checks, please refer to the section titled *Personnel Policies Including Background Checks*.

HW only hires Staff who comport with the background regulations promulgated by the Commission.

HW policy requires the IMMEDIATE DISMISSAL any Staff member who: 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 HW, 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.

HW policy requires that HW obtain certification as a Responsible Vendor.

HW requires that all Staff take and complete a Responsible Vendor Training under 935 CMR 500.105(2)(b). At a minimum, HW Staff shall receive eight (8) hours of on-going training annually.

HW policy requires that all new employees involved in the handling and sale of marijuana for adult use shall successfully complete a responsible vendor program within ninety (90) days of hire.

HW maintains records of responsible vendor training program compliance for four (4) years and can make these records available to inspection by the Commission and any other applicable licensing authority upon request during normal business hours.

HIDDEN WONDERS, LLC

POLICY CONCERNING

STORAGE OF CANNABIS AND CANNABIS PRODUCT

Storage of Cannabis and Cannabis Product

Hidden Wonders ("HW") ensures that its storage of finished products is under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers, per the requirements of 935 CMR 500.105(3)(b)(15).

Storage of product is only conducted in rooms with adequate lighting, ventilation, temperature, humidity, space, and equipment, in accordance with applicable provisions of 935 CMR 500.105 and 500.110.

HW ensures that a separate area is maintained for the storage of cannabis that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, until such products are destroyed in accordance with applicable provision of 935 CMR 500.105(12).

HW ensures that any area where cannabis is stored is maintained in a clean and orderly condition per 935 CMR 500.105(11)(c).

HW will contract an exterminator to professionally maintain the premises on a regular basis, and to ensure that all areas where cannabis is stored are free from infestation by insects, rodents, birds, and pests of any kind as per 935 CMR 500.105(11)(d).

HW policy requires that all areas where it stores cannabis are a maintained in accordance with the security requirements of 935 CMR 500.110.

HW stores all of its cannabis product in HW's safe at night.

HIDDEN WONDERS, LLC

POLICY CONCERNING RESTRICTION OF ACCESS TO PERSONS AGED 21 AND OLDER

<u>Restricting Access to 21 and Over</u>

As per 935 CMR 500.140 (2) <u>On-premises Verification of Identification for Adult Use Only Locations</u>, upon entry into HW's retail premises by an individual, a HW agent shall immediately inspect the individual's proof of identification and determine the person's age. No one shall *not* be admitted to the premises unless the retailer has verified that the person is 21 years of age or older by an individual's proof of identification.

Hidden Wonders's ("HW's") retail store's layout is designed to enable access to consumers with a verified and valid, government-issued photo ID or in possession of a Program ID Card demonstrating the individual is a registered qualifying patient with the Medical Use of Marijuana Program.

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

HW will stop all persons entering the store to determine whether that person may legally enter the premises. All persons must first be verified in the Entry Room. The Entry Room is physically separated from the Store by a closed, and locked door.

Any persons who cannot provide the required legal proof that they are aged **21 years or older** shall be DENIED ENTRY and politely turned away, with an explanation that the law requires all persons entering HW be **21 years or older**.

In the event HW discovers any of its agents intentionally or negligently sold marijuana to an individual under the age of 21, the agent will be immediately terminated, and the Commission will be promptly notified, pursuant to 935 CMR 500.105(1).

Furthermore, HW will not hire any individuals who are under the age of 21 or who have been convicted of distribution of controlled substances to minors, pursuant to 935 CMR 500.030(1).

Pursuant to 935 CMR 500.105(4), HW will not engage in any marketing, advertising or branding practices that are targeted to, deemed to appeal to or portray minors under the age of 21.

HW will not engage in any advertising, marketing and branding via television, radio, internet, mobile applications, social media, or other electronic communication, billboard or other outdoor advertising, including charitable, sporting or similar events, unless at least 85% of the audience is reasonably expected to be 21 years of age or older as determined by reliable and current audience composition data.

HW will not manufacture or sell any edible products that resemble a realistic or fictional human, animal or fruit, including artistic, caricature or cartoon renderings, pursuant to 935 CMR 500.150(1)(b).

In accordance with 935 CMR 500.105(4)(a)(5), any marketing, advertising and branding materials for public viewing will include a warning stating, "For use only by adults 21 years of age or older. Keep out of the reach of children. Marijuana can impair concentration, coordination and judgment. Do not operate a vehicle or machinery under the influence of marijuana."

Pursuant to 935 CMR 500.105(6)(b), HW's packaging for any cannabis or cannabis products will not use bright colors, resemble existing branded products, feature cartoons or celebrities commonly used to market products to minors, feature images of minors or other words that refer to products commonly associated with minors or otherwise be attractive to minors.

HW's website will require all online visitors to verify they are 21 years of age or older prior to accessing the website, in accordance with 935 CMR 500.105(4)(b)(13).

HW will contract with a third-party security company for provision of trained security personnel.

HW's security personnel will require verification that the individual desiring to enter HW are aged **21 years or older**.

HW's security personnel will use the electronic card reader to verify the identification offered by the individual desiring to enter HW.

HW's security personnel will use the Blacklight to examine and verify the identification offered by the individual desiring to enter HW. The Blacklight will often illuminate evidence that the identification has been altered. In the event that an offered identification displays obvious signs of tampering HW staff shall not honor the identification. HW staff shall DENY ENTRY and politely turn that person away, with an explanation that the law requires all persons entering HW to provide acceptable proof that the individual is **21 years or older**.

Customers are only to be allowed entry into the door exiting the Entry Room once they have satisfactorily proved that they are **21 years or older**.

Further, HW Staff shall DENY ENTRY and shall REFUSE to sell cannabis products to a consumer if, in the opinion of the Staff, and based on the information available to the agent at that time, <u>the consumer or the public would be placed at risk</u>.

Clearly intoxicated or impaired persons shall be DENIED ENTRY.

HIDDEN WONDERS, LLC

POLICY CONCERNING

SECURITY PLAN

Security Plan

Hidden Wonders, LLC ("HW") will implement a robust Security Plan with policies and procedures pursuant to 935 CMR 500. First and foremost, HW's security policies and procedures are founded in protecting HW's customers, staff and community.

HW's security policies and procedures are directed toward securing HW's product with property inventory, storage and disposal protocols as outlined in 935 CMR 500 and are designed to prevent diversion of cannabis and cannabis products. All of HW's security policies and procedures are compliant with 935 CMR 500. At no time will any cannabis or cannabis product be visible to the public, from any distance and by any means of visual enhancement.

HW will establish a close working relationship with local law enforcement and will integrate law enforcement recommendations into the Security Plan. HW understands that security includes physical security, cyber security, and procedural security related to the receipt and storage/inventory control of product.

Each of HW's security policies and procedures will be reviewed annually and updated accordingly.

HW will *immediately* report any incidents to law enforcement authorities of any security breach including, but not limited to, discovery of discrepancies identified during inventory, diversion or loss of marijuana products, any loss or unauthorized alteration of records related to marijuana, suspicious actions within the marijuana establishment, failure of an alarm system, activation of an alarm system, or any criminal acts.

HW will provide written notice to the Commission within ten (10) calendar days of any incident that occurs on the premises. HW will maintain records and documentation of any security incident for at least one year.

HW has not named a Director of Security at this time.

Hidden Wonders, LLC's hours of operation are as follows:

Hours of Operation

Monday: 9 a.m. – 10 p.m.

Tuesday: 9 a.m. – 10 p.m.

Wednesday: 9 a.m. – 10 p.m.

Thursday: 9 a.m. – 10 p.m.

Friday: 9 a.m. – 10 p.m.

Saturday: 9 a.m. – 10 p.m.

Sunday: 9 a.m. – 10 p.m.

Hidden Wonders, LLC employs a state-of-the-art video surveillance system, with cameras inside and outside the premises (the "Security System"). The Security System is remotely monitored, as well as providing for third party, backup offsite data storage of the onsite DVR's data.

The Security System is always kept in good working order and HW policy mandates that the Security System is inspected and tested at regular intervals, not to exceed thirty (30) calendar days from the previous inspection and test. Access to all surveillance areas will be limited to employees who are essential to HW's security operations, including local law enforcement.

The Security System has a perimeter alarm on all building entry and exit points and perimeter windows. In addition, the Security System has a failure notification system that provides an audible, text or visual notification of any failure in the surveillance system. The failure notification system provides HW's Security Director, Compliance Manager and Owners with an alert within five minutes after the failure, either by telephone, email or text message.

HW will immediately notify law enforcement authorities of any security breach including, but not limited to, discovery of discrepancies identified during inventory, diversion or loss of marijuana products, any loss or unauthorized alteration of records related to marijuana, suspicious actions within the marijuana establishment, failure of an alarm system, activation of an alarm system, or any criminal acts. HW will provide written notice to the Commission within ten (10) calendar days of any incident that occurs on the premises. HW will maintain records and documentation of any security incident for at least one (1) year.

HW also provides Staff with a duress alarm, panic alarm or hold-up alarm connected to local public safety or law enforcement authorities. Hidden Wonders, LLC has a silent alarm, with activation buttons located in both the retail and back of the house areas. Staff is fully trained in the use of the silent alarm and panic buttons.

The Security System includes multiple video cameras in all areas that may contain marijuana, at all points of entry and exit and parking lot. Video cameras are also directed at safes, vaults, sales areas and areas where marijuana is may be handled or stored on premises. Each of HW's cameras is angled so as to allow for the capture of clear and certain identification of any person entering or exiting Hidden Wonders, LLC. The Security System is designed for compliance with 935 CMR 500.110(5) as enumerated in that section and further described below:

(a) HW has an adequate security system to prevent and detect diversion, theft or loss of marijuana or unauthorized intrusion, which utilizes commercial grade equipment which shall, at a minimum, includes:

1. A perimeter alarm on all building entry and exit points and perimeter windows, if any;
2. A failure notification system that provides an audible, text or visual notification of any failure in the surveillance system. The failure notification system provides an alert to designated employees of HW within five (5) minutes after the failure, either by telephone, email or text message;
3. A duress alarm, panic alarm or hold-up alarm connected to local public safety or law enforcement authorities;
4. Video cameras in all areas that may contain marijuana, at all points of entry and

exit and in any parking lot which shall be appropriate for the normal lighting conditions of the area under surveillance. The cameras are directed at all safes, vaults, sales areas and areas where marijuana is stored, handled or dispensed. HW's cameras are angled so as to allow for the capture of clear and certain identification of any person entering or exiting HW's premises or area;

5. HW maintains 24-hour recordings from all video cameras that are available immediate viewing by the Commission upon request and that are retained for at least ninety (90) calendar days. Recordings shall not be destroyed or altered, and shall be retained as long as necessary if HW is aware of a pending criminal, civil or administrative investigation or legal proceeding for which the recording may contain relevant information;
6. HW's Security System has the ability to immediately produce a clear, color still photo whether live or recorded;
7. HW's Security System produces a date and time stamp embedded in all recordings, which shall be synchronized and set correctly at all times and shall not significantly obscure the picture.
8. HW's Security System has the ability to remain operational during a power outage;
9. HW's Security System utilizes a video recording format that allows for the exporting of still images in an industry standard image format, including .jpg, .bmp and .gif. Exported video shall have the ability to be archived in a proprietary format that ensures authentication of the video and guarantees that no alternation of the recorded image has taken place. Exported video shall also have the ability to be saved in an industry standard file format that may be played on a standard computer operating system. All recordings shall be erased or destroyed prior to disposal;
10. **Cameras directed where cash is kept, handled, and packaged. *935 CMR 500.110(7)***

HW's Security System has the capability to immediately produce a clear, color still photo whether live or recorded, with a date and time stamp embedded in all recordings, which is synchronized and set correctly at all times, and HW takes steps to ensure that nothing significantly obscure the picture of any of the Security System Cameras.

The Security System has the ability to remain operational during a power outage, and this backup equipment will be inspected at least every three (3) years.

The Security System's DVRs employ video recording that allows for the exporting of still images in an industry standard image format, including .jpg, .bmp and .gif., which exported video has the ability to be archived in a proprietary format that ensures authentication of the video and guarantees that no alternation of the recorded image has taken place. The Security System's exported video also has the ability to be saved in an industry standard file format that may be played on a standard computer operating system.

HW policy is that all recordings shall be erased or destroyed prior to disposal.

HW secures all central equipment possible, and the onsite recordings, in a secure location to prevent theft, loss, destruction and alterations.

In accord with 935 CMR 500 (5)(c) HW's Security System has a back-up alarm system, with all the capabilities of the primary system, provided by a company supplying commercial grade equipment, which supplied by same company providing the primary security system.

HW limits access to surveillance areas to persons that are essential to surveillance operations, law enforcement authorities, security system service personnel and the Commission.

HW keeps a current list of authorized employees and service personnel that have access to the surveillance room onsite in the locked DVR Room. The DVR room is not used for any purpose save security and use of the Security System.

HW ensures that all trees, bushes and other foliage outside HW are maintained so as to prevent a person or persons from concealing themselves from sight. And, the Security System includes motion detectors and silent alarm intrusion protection after hours.

HW's Staff is fully trained to support the Security System. All Managers are trained in the operation of the onsite DVR.

In addition to the Security System, HW policy requires that **at least two (2) Staff personnel, including a Security Agent, are present any time Staff are on the premises**.

HW employs a safe, and all product is stored in the safe each night at closing.

HW will also have a specific on-site secure locked safe or vault used exclusively for the purposes of securing cash.

HW only maintains reasonably adequate supplies of product on hand and ensures that daily cash receipts are transported regularly.

Most importantly, Hidden Wonders, LLC will <u>always</u> have security guards on the premises during hours the store is open.

Hidden Wonders, LLC's Staff are trained in proper response to emergency situations at the premises, and HW's Managers conduct role playing practice sessions to assist Staff in learning how to respond to different emergency sessions.

Cash management policies will be developed and shall remain confidential to HW's management and staff. Frequency and timing of cash deposits to be made to financial institutions shall be randomized for security purposes.

<u>YOUR SAFETY IS TOP OF THE LINE'S HIGHEST PRIORITY</u>

All emergency numbers are posted at HW and HW conducts training exercises directed toward reinforcing training. Printed cards ensure that Staff have ready access to emergency information and protocols.

HW ensures that its outdoor premises are extremely well lighted, and that landscaping is cut back to create an open area and unobstructed view surrounding the store.

HW will also ensure that ample signage informs persons outside the facility that they are being recorded and that the facility is protected by monitored security.

HW will maintain a relationship with local law enforcement and is always open to any suggestion from local law enforcement that might enhance security at HW. HW intends to share their implemented Security Plan and security procedures with law enforcement authorities and fire services. HW will periodically update law enforcement authorities and fire services if the plans or procedures are modified in a material way.

HW shall implement sufficient safety measures to deter and prevent unauthorized entrance into HW's areas containing marijuana and theft of marijuana at the Marijuana Establishment.

As noted in Section 1 *Restricting Access to 21 and Older*, Hidden Wonders, LLC positively identifies individuals seeking access to limit HW as being older than 21, and will DENY access to individuals who are not 21 years of age or older; including positively identifying individuals seeking access to the premises of the Marijuana Establishment or to whom or marijuana products are being transported pursuant to 935 CMR 500.105(14) to limit access solely to individuals 21 years of age or older. *See* 935 CMR 500.110 (1)(a).

HW does not permit loitering on its premises, and ensures that only legal customers, over the age of 21, are allowed to remain on the premises, and Hidden Wonders, LLC's implements procedures to prevent loitering and ensure that only individuals engaging in activity expressly or by necessary implication permitted by these regulations and its enabling statute are allowed to remain on the premises. *See* 935 CMR 500.110 (1)(b).

HW always disposes marijuana in accordance with 935 CMR 500.105(12) in excess of the quantity required for normal, efficient operation as established within 935 CMR 500.105. *See* 935 CMR 500.110 (1)(c).

HW secures all entrances to the Marijuana Establishment to prevent unauthorized access. *See* 935 CMR 500.110 (1)(d).

HW has clearly marked and designated limited access areas pursuant to 935 CMR 500.110(4). Hidden Wonders, LLC's Limited Access Areas are only accessed by persons authorized to enter the Limited Access Area. *See* 935 CMR 500.110 (1)(e), and the specific provisions of 935 CMR 500.110(4) as described below:

(a) All limited access areas at HW are identified by sign that are a minimum of 12" x 12" and which state: **"Do Not Enter—Limited Access Area—Access Limited to Authorized Personnel Only"** in <u>lettering no smaller than one inch in height</u>.
(b) All limited access areas are clearly described by the filing of a diagram of the HW's premises, in the form and manner determined by the Commission, reflecting entrances and exits, walls, partitions, vegetation, flowering, processing, production, storage, disposal and retail sales areas.
(c) HW restricts access to limited access areas to employees, agents or volunteers specifically permitted by the Marijuana Establishment, agents of the Commission, state and local law enforcement and emergency personnel.

(d) All HW employees of HW shall visibly display an employee identification badge issued by HW at all times while at HW or transporting marijuana.
(e) HW ensures that outside vendors, contractors and visitors shall obtain a visitor

identification badge prior to entering a limited access area, and shall be escorted at all times by a HW employee authorized to enter the limited access area. The visitor identification badge shall be visibly displayed at all times while the visitor is in any limited access area. All visitors must be logged in and out and that log shall be available for inspection by the Commission at all times. All visitor identification badges shall be returned to HW upon exit.

HW stores all finished marijuana products in a secure, locked safe to prevent diversion, theft and loss in accord with provision of 935 CMR 500.110 (1)(f). Additionally, the safe remains locked during business hours except for the actual time required to remove or replace marijuana in accord with *See* 935 CMR 500.110 (1)(g).

HW always keeps its locks and security equipment in good working order pursuant to *See* 935 CMR 500.110 (1)(h).

In accord with *See* 935 CMR 500.110 (1)(i) HW accounts for all Keys. Keys are only issued to Managers. Keys are clearly marked as “DO NOT COPY” and Keys are routinely changed.

HW protects its Security System and other security measures, such as combination numbers, passwords or electronic or biometric security systems (the “Codes”). Only specifically authorized personnel are permitted access to the Codes. *See* 935 CMR 500.110 (1)(j).

In keeping with 935 CMR 500.110 (1)(k) HW will ensure that the outside perimeter of HW’s property is sufficiently lit to facilitate surveillance.

HW believes exterior lighting is a critical part of the Security Plan. HW’s exterior lighting plan is designed with customer safety and security as foremost considerations.

HW policy always ensures that all marijuana products are kept out of plain sight and are not visible from a public place without the use of binoculars, optical aids or aircraft. *See* 935 CMR 500.110 (1)(l).

Pursuant to 935 CMR 500.110 (1)(m) HW has detailed emergency policies and procedures for securing all product following any instance of diversion, theft or loss of marijuana, and conduct an assessment to determine whether additional safeguards are necessary.

HW stands ready to develop additional safeguards as required by the Commission for Marijuana Establishments that present special security concerns. *See* 935 CMR 500.110 (1)(n).

In accord with 935 CMR 500.110 (1)(o) HW policy includes sharing HW’s security plan and procedures with law enforcement authorities and fire services and periodically updating law enforcement authorities and fire services if the plans or procedures are modified in a material way.

HW will ensure its exterior lighting comports with any local regulations.

In the event HW utilizes its own transport vehicles the following policies will apply:

- **(a) Use of an armored transport provider that is licensed pursuant to M.G.L. c. 147, § 25.** ***935 935 CMR 500.110(7);***
- **(b) Use of a locked bag for the transportation of cash from a Marijuana Establishment to a financial institution or DOR facility if approved for an alternative security measure.** ***935 CMR 500.110(7);***
- **(c) Transportation of cash shall be conducted in an unmarked vehicle if approved for an alternative security measure.** ***935 CMR 500.110(7);***
- **(d) Vehicle used to transport cash shall be staffed with a minimum of two agents if approved for an alternative security measure.** ***935 CMR 500.110(7);***
- **(e) Vehicle used to transport cash shall be equipped with real-time GPS tracking if approved for an alternative security measure.** ***935 CMR 500.110(7);***
- **(f) Vehicle used to transport cash shall have two-way communications with Marijuana Establishment if approved for an alternative security measure.** ***935 CMR 500.110(7);***
- **(g) Prohibiting the transportation of Marijuana or Marijuana Products at the same time that cash is being transported for deposit to a financial institution or DOR facility if approved for an alternative security measure.** ***935 CMR 500.110(7);***
- **(h) Approval of the alternative safeguard by the financial institution or DOR facility if approved for an alternative security measure.** ***935 CMR 500.110(7)***

HIDDEN WONDERS, LLC

POLICY CONCERNING

PREVENTION OF DIVERSION

Prevention of Diversion

Hidden Wonders's ("HW") plan to prevent diversion of cannabis and/or cannabis products to individuals under the age of 21 will ensure prevention of diversion, theft, and illegal or unauthorized conduct pursuant to the Commission's Adult Use of Marijuana regulations codified in 935 CMR 500. The plan begins with four primary focus areas:

1. Procurement
2. Preparation and Dispensing
3. Storage
4. Waste

Specifically, diversion measures include policies and procedures requiring that:

Any persons who cannot provide the required legal proof that they are aged **21 years or older** shall be DENIED ENTRY and politely turned away, with an explanation that the law requires all persons entering HW be **21 years or older**.

HW's security personnel will require verification that the individual desiring to enter HW are aged **21 years or older**.

HW's security personnel will use the electronic card reader to verify the identification offered by the individual desiring to enter HW.

In an effort to identify the false forms of identification commonly used by individuals under the age of 21 to attempt to gain entry, HW's security personnel will use the Blacklight to examine and verify the identification offered by the individual desiring to enter HW. The Blacklight will often illuminate evidence that the identification has been altered.

In the event that an offered identification displays obvious signs of tampering HW staff shall not honor the identification. HW staff shall DENY ENTRY and politely turn that person away, with an explanation that the law requires all persons entering HW to provide acceptable proof that the individual is **21 years or older**.

Customers are only to be allowed entry into the door exiting the Entry Room once they have satisfactorily proved that they are **21 years or older**.

HW maintains a real-time inventory and tracks and tags all cannabis products, using a seed-to-sale methodology in a form and manner to be approved by the Commission.

HW's policy and procedure are to immediately secure and audit all product following any instance of diversion, theft or loss of cannabis and conduct an assessment to determine whether additional safeguards are necessary.

HW's policy requires the IMMEDIATE dismissal of any of HW's Staff who is involved, in any way, in the diversion of cannabis or cannabis product to individuals under the age of 21. HW's policy requires the IMMEDIATE reporting of any of HW's Staff who is involved, in any way, in the diversion of cannabis or cannabis product to individuals under the age of 21 to law enforcement and to the Commission.

HW's policy is to NEVER engage in advertising which could promote the diversion of cannabis or use of cannabis by individuals younger than 21 years old.

HW's policy is that all HW advertising, marketing and branding shall ONLY BE BY means of television, radio, internet, mobile applications, social media, or other electronic communication, billboard or other outdoor advertising, or print publication, where at least 85% of the audience is reasonably expected to be 21 years of age or older, as determined by reliable and current audience composition data.

HW NEVER engages in advertising, marketing, and branding that utilizes statements, designs, representations, pictures or illustrations that portray anyone younger than 21 years old.

Likewise, HW never uses advertising, marketing, and branding including, but not limited to, mascots, cartoons, brand sponsorships and celebrity endorsements, that is deemed to appeal to a person younger than 21 years old.

Warning statements required by the Commission's regulations are affixed to all applicable products, and that HW's labels comply with all other labeling of cannabis and cannabis products requirements under 935 CMR 500.105(5).

Tamper or child-resistant packaging is used for applicable cannabis products, and HW's products comply with all other packaging of cannabis and cannabis products requirements under 935 CMR 500.105(6).

HW employs signage warning customers not to attempt to purchase cannabis or cannabis products for persons under 21. Also, Hidden Wonders NEVER sells more than more than one (1) ounce of cannabis or five (5) grams of cannabis concentrate to a consumer per transaction.

Documentation, Communication and Reporting

Working with the CEO, CCO shall be the primary channel of communication with the State on diversion matters. The CCO collaborates with other departments within HW (e.g., Security, Finance/Accounting, Dispensary, etc.) and directs compliance issues to appropriate existing channels for investigation and resolution, ultimately subject to the CCO's oversight. The CCO consults with HW's legal counsel as needed to resolve difficult legal compliance issues and will promptly respond to alleged violations of rules, regulations, policies, procedures, and ethics by evaluating or recommending the initiation of investigative procedures and oversees a system for uniform handling of such violations.

HW's CCO will immediately report to CCC all diversion-related incidents. Further, the CCO will document the incident and include date/time, names of parties involved, quantity of diversion, location, and a narrative of the investigation summary. As appropriate, the CCO and Director of Security may contact the Massachusetts State Police and local law enforcement as well.

External Audits
On an annual basis, Hidden Wonders, under the direction of its Chief Operating Officer, reporting to the Chief Executive Officer, will engage an outside auditor and the Director of Security to audit the Facility's security system. The auditor's results will be contained in an audit report, which will be retained on file at HW's corporate offices, and which will be available for review or submission to the CCC or Massachusetts State Police upon request.

Inventory Control Practices
The Company's cannabis products and material are marked to clearly convey to the holder that the storage container contains a controlled cannabis product, the amount of cannabis contained in the container, the portions that contain cannabis products, and a bar code for assignment and tracking. Cannabis products and currency shall not be commingled in the same security container within the Product Vault. All cannabis inventories will be stored onsite. The Inventory System will be used to track all products and utilized to verify all product identification and weight measurements. Any changes made to the DPP and the Inventory System must be reviewed and approved by the CCO with concurrence of the Director of Security.

A "Two-Person Integrity Rule" shall be required in program areas where high risk of compromise or of potential diversion is assessed by the Director of Security.

On a weekly basis, the Facility will conduct an inventory count of cannabis inventory. In the event of a discrepancy between total weight of cannabis received and dispensed (after accounting for stored and destroyed product), the Facility personnel shall notify the Director of Security, who will in turn inform the CCO. The Director of Security shall immediately perform an internal audit to determine the reason for the discrepancy. If the Facility determines that there is an error or inaccuracy in its inventory then it will investigate the cause and immediately put into place corrective operational measures, in accordance with the applicable procedures, to avoid such error or inaccuracy in the future. All errors and inaccuracies as well as corrective action measures will be documented and retained on file by the Director of Security. If an error has not occurred, the appropriate diversion procedures shall be implemented, and the diversion investigation, and all required reports shall be made to CCC, Massachusetts State Police, and local law enforcement as appropriate.

All cannabis sales will be conducted in areas not visible to the public. All exterior windows will contain privacy shielding to prevent observation by individuals outside of HW's Facility property.

Packaging and Labeling
HW's approach is to stay ahead of the potential diversion threats, tampering, mislabeling, and unauthorized access. All products will be clearly labeled on each individual product packaging, which will permit inventory control, tracking, and prevent counterfeit product. Packaging will include a number of security features designed to further make apparent any tampering. HW will

also employ additional anti-diversion packaging and labeling based on industry "best practices." As noted, prior to implementation or altering packaging and labeling, HW will consult with CCC.

HIDDEN WONDERS, LLC

POLICY CONCERNING TRANSPORTATION OF CANNABIS AND CANNABIS PRODUCTS

Overview

Hidden Wonders, LLC ("HW") may transport cannabis. To the extent HW transports cannabis, its inventory procedures for transportation are set forth in its transportation policies especially upon delivery of cannabis to its location, following the provisions of 935 CMR 500 et seq when transporting cannabis and cannabis product.

HW records the date of the transportation of any inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the transportation and accompanying inventory.

HW tags and tracks all cannabis products being transported using a seed-to-sale methodology in a form and manner to be approved by the Commission.

There will be no advertising, marketing or branding, including, but not limited to, vinyl-wrapped vehicles, signs, logos or markings, indicating that the vehicle is being used to transport cannabis on transportation vehicles or company cars.

HW will staff all vehicles transporting cannabis and cannabis products with at least two HW agents, one of whom will remain in the vehicle at all times that the vehicle contains cannabis or cannabis products. Prior to departing the premises to transport cannabis products, HW will make a video record of weighing, inventorying, and accounting for all cannabis products to be transported.

HW may contract with a licensed Marijuana Transporter to transport cannabis products.

HW reserves the right to refuse delivery of any cannabis and cannabis product that is not compliant, or that does not meet HW's rigid quality control standards. Any cannabis product that is refused or is otherwise undeliverable shall be transported back to the originating establishment.

When receiving transported cannabis, and within eight (8) hours after arrival, HW re-weighs, re-inventories, and accounts for, on video, all cannabis products transported to HW.

HW's videotaping the weighing, inventorying, and accounting of cannabis products before transportation or after receipt, always shows each product being weighed, the weight, and the manifest.

HW will not transport cannabis and cannabis product unless that product is packaged in sealed, labeled, and tamper or child-resistant packaging prior to and during transportation.

In the case of an emergency stop during the transportation of cannabis products, HW policy requires that a log must be maintained describing:

1. The reason for the stop, and;
2. The duration of the stop, and;

3. The location of the stop, and;
4. Any activities of personnel exiting the vehicle.

HW never uses the same transportation route twice when HW transports cannabis and cannabis product. HW ensures that all transportation times and routes are randomized.

HW ensures that all transport routes remain within the Commonwealth. NO CANNABIS OR CANNABIS PRODUCT BEING TRANSPORTED MAY EVER LEAVE THE COMMONWEALTH OF MASSACHUSETTS FOR ANY REASON WHATSOEVER.

HW ensures all vehicles and transportation equipment used in the transportation of cannabis products or edibles to HW requiring temperature control for safety must be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the cannabis products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c). Any vehicle used to transport cannabis or cannabis products that is owned or leased by HW or a cannabis transporter, will be properly registered, inspected and insured in the Commonwealth, and equipped with an alarm system.

Vehicles and Storage Requirements
A vehicle used for transporting marijuana products must be: owned or leased by HW; properly registered, inspected, and insured in the Commonwealth (documentation of such status shall be maintained as records of HW, and shall be made available to the Commission upon request); equipped with an alarm system approved by the Commission; and equipped with functioning heating and air conditioning systems appropriate for maintaining correct temperatures for storage of marijuana products.

- Marijuana products must not be visible from outside the vehicle.
- GPS tracking will be used on all vehicles.
- Any vehicle used to transport marijuana products shall not bear any markings indicating that the vehicle is being used to transport marijuana products, and any such vehicle shall not indicate the name of HW.
- When transporting marijuana products, no other products may be transported or stored in the same vehicle.
- No firearms may be located within the vehicle or on a HW agent.
- Clearly visible and security protected Identification Badges will be displayed.
- Transporters will have valid Driver's licenses.
- Marijuana products must be transported in a secure, locked storage compartment that is a part of the vehicle transporting the marijuana products.
- The storage compartment must be sufficiently secure that it cannot be easily removed.
- Predetermined randomized routes to ensure no unscheduled detours or unannounced stops.
- Reporting instructions and checklist for any accidents, diversions, losses, or transport related incidents. A licensed Marijuana Establishment shall, as an element of its license, be licensed to transport its marijuana products to other licensed establishments, except as otherwise provided herein.
- Vehicle inspection will be authorized at any time for CCC, authorized agents, law

enforcement, Federal, State, or local officials while in route or at the Facility.

- Third party contractors will comply with all transportation requirements listed in the Act.
- Marijuana products may only be transported between licensed Marijuana Establishments by registered marijuana establishment agents.
- The originating and receiving licensed Marijuana Establishments shall ensure that all transported marijuana products are linked to the seed-to-sale tracking program. For the purposes of tracking, products will be properly tracked and labeled in a form and manner determined by the Commission.

In addition to the above-mentioned procedures set forth by the Company, the Company will strictly adhere to 500.105(13) Transportation Between Marijuana Establishments as noted below:

(a) General Requirements.

1. A licensed Marijuana Establishment shall, as an element of its license, be licensed to transport its marijuana products to other licensed establishments, except as otherwise provided herein.
2. Marijuana products may only be transported between licensed Marijuana Establishments by registered marijuana establishment agents.
3. A licensed Marijuana Transporter may contract with a licensed Marijuana Establishment to transport that licensee's marijuana products to other licensed Marijuana Establishments.
4. The originating and receiving licensed Marijuana Establishments shall ensure that all transported marijuana products are linked to the seed-to-sale tracking program. For the purposes of tracking, products will be properly tracked and labeled in a form and manner determined by the Commission.
5. Any marijuana product that is undeliverable or is refused by the destination Marijuana Establishment shall be transported back to the originating establishment.
6. All vehicles transporting marijuana products shall be staffed with a minimum of two marijuana establishment agents. At least one agent shall remain with the vehicle at all times that the vehicle contains marijuana or marijuana products.
7. Prior to leaving a Marijuana Establishment for the purpose of transporting marijuana products, the originating Marijuana Establishment must weigh, inventory, and account for, on video, all marijuana products to be transported.
8. Within eight (8) hours after arrival at the destination Marijuana Establishment, the destination establishment must re-weigh, re-inventory, and account for, on video, all marijuana products transported
9. When videotaping the weighing, inventorying, and accounting of marijuana products before transportation or after receipt, the video must show each product being weighed, the weight, and the manifest.
10. Marijuana products must be packaged in sealed, labeled, and tamper or child- resistant packaging prior to and during transportation.
11. In the case of an emergency stop during the transportation of marijuana products, a log must be maintained describing the reason for the stop, the duration, the location, and any activities of personnel exiting the vehicle.

12. A Marijuana Establishment or a Marijuana Transporter transporting marijuana products shall ensure that all transportation times and routes are randomized.
13. A Marijuana Establishment or a Marijuana Transporter transporting marijuana products shall ensure that all transport routes remain within the Commonwealth.

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

15. All vehicles shall be equipped with a video system that includes one or more video cameras in the storage area of the vehicle and one or more video cameras in the driver area of the vehicle and which shall remain operational at all times during the entire transportation process and which shall have: a. The ability to produce a clear color still photo whether live or recorded; and b. A date and time stamp embedded in all recordings which shall always be synchronized and set correctly and may not significantly obscure the picture.

(b) Reporting Requirements.

1. Marijuana establishment agents must document and report any unusual discrepancy in weight or inventory to the Commission and law enforcement authorities not more than 24 hours of the discovery of such a discrepancy.
2. Marijuana establishment agents shall report to the Commission and law enforcement authorities any vehicle accidents, diversions, losses, or other reportable incidents that occur during transport, not more than 24 hours of such accidents, diversions, losses, or other reportable incidents.

(c) Vehicles.

1. A vehicle used for transporting marijuana products must be:
   a. owned or leased by the Marijuana Establishment or the Marijuana Transporter;
   b. properly registered, inspected, and insured in the Commonwealth (documentation of such status shall be maintained as records of the Marijuana Establishment or the Marijuana Transporter, and shall be made available to the Commission upon request);
   c. equipped with an alarm system approved by the Commission; and
   d. equipped with functioning heating and air conditioning systems appropriate for maintaining correct temperatures for storage of marijuana products.
2. Marijuana products must not be visible from outside the vehicle.
3. Any vehicle used to transport marijuana products shall not bear any markings indicating that the vehicle is being used to transport marijuana products, and any such vehicle shall not indicate the name of the Marijuana Establishment or the Marijuana Transporter.
4. When transporting marijuana products, no other products may be transported or stored in the same vehicle.
5. No firearms may be located within the vehicle or on a marijuana establishment

agent.

(d) Storage Requirements.

1. Marijuana products must be transported in a secure, locked storage compartment that is a part of the vehicle transporting the marijuana products.
2. The storage compartment must be sufficiently secure that it cannot be easily removed.
3. If a Marijuana Establishment, pursuant to a Marijuana Transporter License, or a Marijuana Transporter is transporting marijuana products for more than one Marijuana Establishment at a time, the marijuana products for each Marijuana Establishment shall be kept in a separate locked storage compartment during transportation and separate manifests shall be maintained for each Marijuana Establishment.
4. If a Marijuana Establishment is transporting marijuana products to multiple other establishments, it may seek the Commission's permission to adopt reasonable alternative safeguards.

(e) Communications.

1. Any vehicle used to transport marijuana products shall contain a global positioning system (GPS) monitoring device that is:
   a. not a mobile device that is easily removable;
   b. attached to the vehicle at all times that the vehicle contains marijuana products;
   c. monitored by the Marijuana Establishment or Marijuana Transporter during transport of marijuana products; and
   d. inspected by the Commission prior to initial transportation of marijuana products, and after any alteration to the locked storage compartment.
2. Each marijuana establishment agent transporting marijuana products shall have access to a secure form of communication with personnel at the originating location at all times that the vehicle contains marijuana and marijuana products.
3. Secure types of communication include, but are not limited to:
   a. two-way digital or analog radio (UHF or VHF);
   b. cellular phone; or
   c. satellite phone.
4. When choosing a type of secure communications, the following shall be taken into consideration:
   a. cellular signal coverage;
   b. transportation area;
   c. base capabilities;
   d. antenna coverage; and
   e. frequency of transportation.
5. Prior to, and immediately after leaving the originating location, the marijuana establishment agents shall use the secure form of communication to contact the originating location to test communications and GPS operability.
6. If communications or the GPS system fail while on route, the marijuana establishment agents transporting marijuana products must return to the originating location until the communication system or GPS system is operational.

7. The marijuana establishment agents transporting marijuana products shall contact the originating location when stopping at and leaving any scheduled location, and regularly throughout the trip, at least every 30 minutes.
8. The originating location must have a marijuana establishment agent assigned to monitoring the GPS unit and secure form of communication, who must log all official communications with marijuana establishment agents transporting marijuana products.

(f) Manifests.
1. A manifest shall be filled out in triplicate, with the original manifest remaining with the originating Marijuana Establishment, a second copy provide to the destination Marijuana Establishment upon arrival, and a copy to be kept with the licensed marijuana establishment agent during transportation and returned to the Marijuana Establishment or Marijuana Transporter upon completion of the transportation.
2. Prior to transport, the manifest shall be securely transmitted to the destination Marijuana Establishment by facsimile or email.
3. Upon arrival at the destination Marijuana Establishment, a marijuana establishment agent at the destination Marijuana Establishment shall compare the manifest produced by the agents who transported the marijuana products to the copy transmitted by facsimile or email. This manifest must, at a minimum, include;
a. the originating Marijuana Establishment name, address, and registration number;
b. the names and registration numbers of the agents who transported the marijuana products;
c. the name and registration number of the marijuana establishment agent who prepared the manifest;
d. the destination Marijuana Establishment name, address, and registration number;
e. a description of the marijuana products being transported, including the weight and form or type of product;
f. the mileage of the transporting vehicle at departure from originating Marijuana Establishment and mileage upon arrival at destination Marijuana Establishment, as well as mileage upon return to originating Marijuana Establishment;
g. the date and time of departure from originating Marijuana Establishment and arrival at destination Marijuana Establishment for each transportation;
h. a signature line for the marijuana establishment agent who receives the marijuana products;
i. the weight and inventory before departure and upon receipt;
j. the date and time that the transported products were re-weighed and re- inventoried;
k. the name of the marijuana establishment agent at the destination Marijuana Establishment who re-weighed and re-inventoried products; and
l. the vehicle make, model, and license plate number.
4. The manifest shall be maintained within the vehicle during the entire transportation process, until the delivery is completed.
5. A Marijuana Establishment shall retain all transportation manifests for no less than one year and make them available to the Commission upon request.

(g) Requirements for Agents.
1. Each employee or agent transporting or otherwise handling marijuana products for a

Marijuana Transporter must be registered as a marijuana establishment agent and have a driver's license in good standing issued by the Massachusetts Registry of Motor Vehicles for all classes of vehicle the marijuana establishment agent will operate for the Marijuana Transporter prior to transporting or otherwise handling marijuana products.

2. A marijuana establishment agent shall carry his or her registration card at all times when transporting marijuana products, and shall produce his or her registration card to the Commission or law enforcement officials upon request.

(h) Marijuana Transporters shall use best management practices to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts.

(i) (i) A CMO can transport adult use and medical use Marijuana and Marijuana Products if it is appropriately licensed to do so. Where a CMO is transporting both adult use and medical use Marijuana, MIPs and Marijuana Products, the CMO shall comply with the more restrictive security provisions.

2) Access to the Commission, Emergency Responders and Law Enforcement.

(a) The following individuals shall have access to a Marijuana Establishment or Marijuana Establishment transportation vehicle:

1. Representatives of the Commission in the course of responsibilities authorized by St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000;
2. Representatives of other state agencies of the Commonwealth; and
3. Emergency responders in the course of responding to an emergency.

(b) 935 CMR 500.000 shall not be construed to prohibit access to authorized law enforcement personnel or local public health, inspectional services, or other permit-granting agents acting within their lawful jurisdiction.

HIDDEN WONDERS, LLC

PERSONNEL POLICY

Overview
Hidden Wonders ("HW") will only hire Staff (a/k/a "Agents" and/or "Employees") who comply with background regulations disseminated by the Commission.

Agent Personnel Records
HW will maintain employee records for each agent for at least twelve (12) months after termination of the agent's affiliation with HW and records will include, but not limited to:

- All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
- The job description or employment contract that includes descriptions of the agent's duties, authority, responsibilities, qualifications, and supervision;
- Required training, including training regarding privacy and confidentiality requirements, and the signed statement of the person indicating the date, time, and place the agent received said training;
- Performance evaluations;
- Records of any disciplinary action taken;
- Background investigation, including CORI reports;
- Documentation of all security related events (including violations) and the results of any investigations and description of remedial actions, restrictions, or additional training required as a result of an incident.

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

HW policy requires the IMMEDIATE DISMISSAL any Staff member who:

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 HW, 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.

HW policy requires that it obtain certification as a Responsible Vendor.

HW requires all Staff take and complete a Responsible Vendor Training under 935 CMR 500.105(2)(b). At a minimum, HW Staff shall receive eight (8) hours of on-going training annually.

HW policy requires that all new employees involved in the handling and sale of marijuana for adult use shall successfully complete a responsible vendor program within ninety (90) days of hire.

HW will maintain records of responsible vendor training program compliance for four (4) years and can make them available to inspection by the Commission and any other applicable licensing authority upon request during normal business hours.

Job Descriptions

Chief Executive Officer/Chief Financial Officer: The CEO/CFO shall provide overall leadership and vision for Hidden Wonders. The CEO/CFO will work with and support the executive management team and employees to assure that HW sets reasonable business and community benchmarks, in order to achieve its goals and fulfill its mission. CEO/CFO duties will include but are not limited to the following:

- Work as the team leader with other executives and employees to review HW's business and community objectives, and implement plans to achieve those objectives;
- Lead HW's interactions with state regulators and municipal officials;
- Oversee the company's financial operations and associated responsibilities related to Hidden Wonders's Certified Tax Accountants;
- With the Chief Operating Officer/Chief Compliance Officer (COO/CCO), oversee compliance with Massachusetts law and regulations, including 935 CMR 500.000 et seq.;
- With the COO/CCO, oversee compliance with 935 CMR 500.105(2)(b), including all Responsible Vendor Training requirements for employees;
- Develop, oversee and execute a staffing plan and certain hiring protocols;
- Develop and implement personnel policies and procedures;
- Develop protocols to attract, hire, advance, discipline and terminate employees and volunteers as needed to support HW's operations;
- Ensure compliance with all workplace policy laws and requirements;
- With the COO/CCO to oversee ongoing compliance with the provisions of 935 CMR 500.101(2)(e)(8);
- With the COO/CCO, oversee operating procedures to assure ongoing compliance with the provisions of 935 CMR 500.105(1);
- Work with the executive management team and the COO/CCO to implement a plan to prevent the diversion of product in accordance with the applicable regulations, including 935 CMR 500.101 and 935 CMR 500.105;
- Work with the executive management team and the COO/CCO to implement a diversity plan that promotes equity among minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientations;
- Work with HW's HR Manager and department mangers, ensure the Diversity Plan and Community Initiatives; and
- Work with HW's HR Manager and department managers to implement HW's Plan to Positively Impact Areas of Disproportionate Impact.

Chief Operating Officer/Chief Compliance Officer: In this combined role, the COO/CCO shall operate and be responsible for the maintenance, staffing and ongoing operation of the retail facility. COO/CCO duties shall include:

- Work with the CEO/CFO to manage financial reporting and budgeting;

- Oversee policies and procedures relating to the retail facility;
- Work with the Security Director to oversee background check process on all employees in a manner consistent with Massachusetts law and regulation, including 935 CMR 500.000;
- Coordinate all staff work hours, assignments and collaborations;
- Develop plan to meet the demands of the business;
- Manage HW's human resources team;
- Manage payroll administration;
- Supervise accounting and payables functions;
- Oversee tax preparation and auditing in conjunction with the CEO/CFO and Certified Tax Accountant;
- Ensure quality control and testing of marijuana flower in compliance with 935
- CMR 500.160;
- With the CEO/CFO to uphold company and facility compliance with Massachusetts law and regulations, including 935 CMR 500.000 et seq.;
- With the CEO/CFO to facilitate HW's interactions with state regulators and municipal officials;
- Ensure compliance with 935 CMR 500.105(2)(b), including all Responsible Vendor Training requirements for employees;
- Prepare and amend as needed a HW plan to assure ongoing compliance with the provisions of 935 CMR 500.101 et seq.;
- Prepare and amend as needed a set of detailed written operating procedures to assure ongoing compliance with the provisions of 935 CMR 500.105(1);
- Keep and maintain all HW records, making them available for inspection by the Commission, upon its request, in accordance with 935 CMR 500.105(9);
- In collaboration with the Director of Security, implement and administer background checks and suitability determinations on all HW employees in a manner consistent with Massachusetts law and regulation, including 935 CMR 500.000;
- Review background checks prior to any employee start date, and before any employee is granted access to any HW facility in a manner consistent with Massachusetts law and regulation, including 935 CMR 500.100; and
- Register each employee with DCJIS pursuant to 803 CMR 2.04 to determine suitability.

<u>Security Director:</u> Under the supervision of the CEO/CFO, the Security Director will be responsible for the development and overall management of the Security Policies and Procedures for HW, while implementing, administering, and revising the policies as needed.

To further ensure employee suitability, HW's Security Director will:

- Review any and all conditions, offenses, and violations occurring in Massachusetts or any other state, whether under state law or under the laws of the United States, or the law of any military, territorial or Native American tribal authority, or any other jurisdiction.
- Review any and all criminal disqualifying conditions, offenses, and violations, including

the crimes of attempt, accessory, conspiracy, and solicitation.

- Where applicable, review all look back periods for criminal conditions, offenses, and violations included in 935 CMR 500.802 commence upon the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look back period will commence upon release from incarceration.
- Not consider juvenile dispositions as a factor for determining suitability.
- Ensure compliance with all provisions of 935 CMR 500.110;
- Train and supervise security agents;
- Provide staffing, shift change and general oversight of security operations;
- Review and ensure proper maintenance of all security apparatus, including
- physical, human and technological security methods and equipment;
- Ensure that all required background checks have been completed and documented prior to an agent performing job functions; ensure agent is granted appropriate level of access to the facility necessary to complete his/her job functions;
- Review and approve incident reports and other reports written by Security Agents prior to submitting to the executive management team—follow up with security agent if needed;
- Provide training specific for Security Agents prior to commencing job functions;
- Maintain frequent contact with state inspectors and local law enforcement authorities;
- Maintain lists of agents authorized to access designated areas of the HW facility, including cash and product storage vaults, the surveillance and network equipment room, and other highly sensitive areas of the HW facility;
- Lead a management team to ensure policies and procedures are properly implemented, integrated, effective, and relevant to ensure the safety of HW agents and assets;
- Maintain all security-related records, incident reports and other reports written by security agents; and
- Evaluate and determine the number of security agents assigned to each shift and proper shift change times.

Security Agent: Security Agents will monitor HW's security systems including alarms, video surveillance, and motion detectors. Security Agents will ensure only authorized people are permitted access to the HW facility. Security Agents will verify appropriate ID cards and other forms of identification. Security Agents will also perform the following duties and other duties as needed:

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

Human Resources Manager: HW's HR Manager will support the executive management team. The HR Manager will implement all personnel policies and procedures for HW, including hiring processes. The Human Resources Manager will also:

- Oversee hiring and release of HW agents;
- Ensure compliance with any and all workplace policy laws and requirements;
- Review and revise HW personnel policies and procedures in consultation with the executive management team and department managers;
- Handle any and all agent discipline as needed;
- Develop training schedules and policies for HW agents under the supervision of the executive management team and department managers; and
- Be responsible for additional human resources tasks decided by HW's executive management team.
- Oversee HW's Diversity Plan and Community Initiatives;
- Oversee HW's Plan to Positively Impact Areas of Disproportionate Impact;
- Comply with State anti-discrimination statutes and Equal Employment Opportunity Commission (EEOC) requirements;
- Working with the Chief Compliance Officer, employ reporting of criminal convictions (and termination if necessary);
- Comply with the State and Federal Family Leave Act;
- Comply with Workplace Safety Laws;
- Instate Workers' Compensation;
- Working with the Chief Compliance Officer, employ the Background Check process for all employees;
- Comply with State and Federal Minimum Wage Requirements; and
- Comply with any other applicable local, state, or federal employment laws, rules, or regulations.

Inventory Manager: The Inventory Manager will oversee HW's inventory on a day-to-day basis. The Inventory Manager will be responsible for weekly and monthly inventory counts and waste disposal requirements. The Inventory Manager will perform a yearly comprehensive inventory together with the executive management team. Additional duties include, but are not limited to:

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

Inventory Associate: Inventory Associates support the Inventory Manager during HW's daily operations. Responsibilities will include:

- Ensuring all products are properly stored, labeled, and recorded in HW inventory system;
- Maintaining records, including operating procedures, inventory records, audit records,

storage and transfer records;
- Ensuring waste is properly stored;
- Maintaining documents with each day's beginning, acquisitions, sales, disposal and ending inventory; and
- Coordinating the waste disposal schedule and ensuring HW's policies and procedures for waste disposal are followed.

Retail Manager: Manages all HW Member Services Agents and oversees day-to-day operations of HW's retail facility. Other responsibilities and duties will include:
- Training retail staff;
- Reporting any incidents and complaints to the executive team;
- Working with bookkeeping to ensure precise data flow;
- Ensuring customer satisfaction through feedback tools; and
- Implementing inventory tracking.

Retail Agent: Ensures that each HW customer is treated with respect while at a HW facility. Responsible for making sure that each customer receives the appropriate amount of individualized attention in order to address their specific needs and questions. Job responsibilities include:
- Being knowledgeable of the various products that HW offers;
- Understanding and acknowledging individual customer goals;
- Maintaining a clean, safe, healthy, and productive environment so that customers have a positive experience;
- Answering customer questions related to products including flowers, concentrates, tinctures, and edibles;
- Enforcing and executing compliance with Commission regulations and HW policies and procedures;
- Setting up product displays based on HW policies and procedures;
- Understanding sales transactions using HW systems;
- Participating in ongoing education and professional development; and
- Reconciling cash from daily sales transactions, sales reports, and other forms of day-to-day task management.

HW will follow 935 CMR 500.030(2) regarding agent personnel records during the application process, including any requirements and other information required by the Commission, and in compliance with state and federal laws related to all HR-related activities.

Standards of Conduct

HW will not tolerate harassment or discrimination on the basis of sex, race, color, national origin, age, religion, disability, sexual orientation, gender identity, gender expression, or any other trait or characteristic protected by any applicable federal, state, or local law or ordinance.

All HW managers and employees will be expected to maintain the highest degree of professional behavior and standards.

Workplace Attire
HW's new hire training and the onboarding process will discuss specific workplace attire for each role. The HR Manager and department managers will ensure compliance with all requirements related to workplace attire.

At-Will Employment
HW's policy is to support is at-will unless otherwise stated, as consistent within the Commonwealth of Massachusetts.

Violence and Weapons
Weapons are not allowed on site by employees, customers, or visitors. In the case of a violent event or threat, law enforcement will be contacted immediately. Any employee found carrying a weapon on the premises of a HW facility will be immediately terminated.

<u>Hours of Operation</u>

Monday: 8:00 a.m. – 9:00 p.m.

Tuesday: 8:00 a.m. – 9:00 p.m.

Wednesday: 8:00 a.m. – 9:00 p.m.

Thursday: 8:00 a.m. – 9:00 p.m.

Friday: 8:00 a.m. – 9:00 p.m.

Saturday: 8:00 a.m. – 9:00 p.m.

Sunday: 8:00 a.m. – 9:00 p.m.

<u>Personnel Policies and Procedures</u>

Standard Employment Practices
HW believes that it can attract a better workforce and increase employee retention by employing workplace satisfaction by offering highly competitive wage and benefits packages and developing a culture that values a proper work-life balance. HW is committed to hiring a management team that works one on one with their subordinates to foster a work ethic that focuses on the mission of the company and spirit of the adult-use marijuana program in Massachusetts.

Investigations
The HR Manager, working with the Chief Operating Officer/Chief Compliance Officer, will create and implement policies and procedures to investigate any complaints or concerns identified or raised internally or externally in order to stay compliant with 935 CMR 500.000 et. seq.

Compliance with Law and Regulation
TM's written policies shall adhere to applicable federal and state laws, including but not limited to the Family and Medical Leave Act, the Consolidated Omnibus Budget Reconciliation Act, the Equal Employment Opportunity Act, the Employee Retirement Income Security Act, the

Americans with Disabilities Act, 935 CMR 500.000 et. seq., and with laws pertaining to holidays, work hours, personal time, paid time off, confidentiality and workplace safety. The executive management team oversees company compliance, and the CEO/CFO shall implement company policies and procedures.

Job Classifications

Positions at HW are categorized by rank and department. HW's executive management team will be responsible for the overall success of the company's mission. The CEO/CFO shall be responsible for implementing HW's vision and mission. The entire executive management team will work closely together to ensure that each HW department executes its functions and responsibilities in a proper and professional manner. Job classification will consist of three tiers: Executive Management, Management, and Non-Management Employee.

Work Schedules

Work schedules will be either part-time, full-time, or salaried, depending on the specific position. Schedules will be set according to the needs of each department and will be determined by the respective department manager and the executive manager to whom they report. It will be the department manager's responsibility to develop and implement a work schedule that provides necessary duty and personnel coverage while not exceeding each role's requirements for full execution of HW day-to-day operations. The department manager must also make sure that adequate coverage occurs on a daily basis and does not lead to abuse or unnecessary use of overtime.

Performance Reviews

Performance reviews will be conducted by executive or department managers. Reviews will be conducted at three-month intervals for new employees during the first year. After the initial three-month period, reviews will occur at six-month intervals. Employees under review will receive a written summary of their performance. Reviews must be kept in each employee's employment file. Performance reviews must highlight both positive performance factors as well as areas that need improvement. HW may use scoring systems to determine an employee's overall performance.

Advancement & Compensation

Employee participation in training and bi-annual performance evaluations will be required for any promotions or pay increases. Compensation shall be negotiated on an individual basis. HW shall determine compensation based on the prevailing wage in the marketplace. Compensation shall account for skill, experience, education, work history and other lawful criteria as determined by HW. The CEO/CFO and the executive management team shall determine compensation rates. HW shall at all times comply with applicable state and federal law in determining employee compensation.

Mandatory Meetings and Community Service Days

Each month, HW will conduct mandatory, repeating company-wide meetings. Certain personnel, such as housekeeping staff, may not be required to attend every meeting. Department managers will determine employee attendance. Department managers will also schedule and conduct mandatory weekly meetings. Department managers will provide agendas for all meetings and will report in writing to their executive manager on the results and progress of each meeting.

Breaks
HW employees will be allowed to take daily breaks, including lunch breaks, according to the laws of the Commonwealth.

Leave Policies
HW leave policies will comply with all applicable state and federal statutes. All full-time employees will receive two (2) 40-hour weeks of paid vacation annually. Leave must be requested at least two (2) weeks in advance and approved by the CEO/CFO or designee. HW anticipates observing all national holidays and will elect on an annual basis whether to observe state holidays.

Disciplinary Policy
HW has adopted a disciplinary policy designed to provide a graduated series of corrective actions. This policy, called the "Steps" policy, is intended to improve employee performance, promote the maintenance of a cohesive and productive workplace, and prevent recurring adverse behaviors. In addressing disciplinary matters, HW shall apply the steps described below:

Step 1: Individual Advice and Counsel
A member of the executive management team shall individually discuss the subject conduct with the employee. The executive shall identify the offending conduct, and clearly outline company expectations for resolution.

Step 2: Written Warning
Within seven (7) days of the discussion described in Step 1, the executive will prepare a document characterizing the discussion, and will provide a copy of the document to the employee. The employee will sign the document, a copy of which HW will maintain in the personnel file.

Step 3: Final Written Warning
Should the offending conduct persist or reoccur, a member of the executive management team will prepare a document characterizing the offending conduct, and will provide a copy of the document to the employee. The document may include witness statements or reference other evidence. The document will state "Final Warning" in prominent text. The employee will sign the document, a copy of which will maintain in the HW personnel file. If the executive finds the offending conduct problematic, disruptive and/or harmful, or implicants the health or safety of other employees, the executive may recommend to the CEO/CFO that the employee be removed from the workplace. The CEO/CFO shall act on any such recommendation within forty-eight (48) hours.

Step 4: Termination of Employment
The last step is termination of employment. HW reserves the right to terminate if, notwithstanding the steps set forth above, employee conduct fails to comport with HW policies and procedures. HW reserves the right to terminate without prior notice or disciplinary action. The CEO/CFO must approve termination in writing, a copy of

which HW will maintain in the personnel file.

Nothing in this policy provides any contractual rights regarding employee discipline or counseling. Nor should anything outlined in this policy should be read or understood as modifying or changing the employment-at-will relationship between HW and its employees.

Conduct Issues Not Subject to Progressive Discipline
Illegal behavior is not subject to progressive discipline and may be reported to local law enforcement. Examples of behavior that are not subject to progressive discipline and may be grounds for immediate termination include: theft, intoxication at work, fighting and other acts of violence.

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

Separation of Employment
A separating employee may contact the CEO/CFO or other supervising authority to schedule an exit interview. HW reserves the right to refuse any such interview. The interview, if any, shall occur on or after the employee's last day of work.

Return of Property
At the time of separation, HW employees must return all company property, examples of which can include cell phones, keys and key cards, identification cards, computers and/or laptops and uniforms. Failure to return certain items may result in deductions from that employee's final paycheck. All separating employees must also sign a Wage Deduction Authorization Agreement, which allows HW to deduct the costs of such items from their final paycheck.

Termination of Benefits
An employee separating from HW is eligible to receive benefits as long as the appropriate procedures are followed as outlined in this document. The employee must give two weeks' notice. The employee must work those final two work weeks in full. Any accrued vacation time will be paid in the last paycheck. Accrued sick leave will also be paid out in the last paycheck.

Health Insurance
Health insurance terminates on the last day of the month of employment, unless employee requests immediate termination of benefits. HW shall provide information about employee rights under the Consolidated Omnibus Budget Reconciliation Act (COBRA) relative to the continuation of health insurance coverage.

Agent Background Checks

In addition to completing the Commission's agent registration process, all agents hired to work for HW will undergo an extensive, detailed background investigation process before being allowed access inside HW or prior to beginning work duties, performed in accordance with 935 CMR 500.101(1).

Suitability determinations will be made in accordance with the procedures set forth in 935 CMR 500.800.

Upon adverse determination, HW will provide each applicant with a copy of their background screening report and a pre-adverse determination letter. This report and letter will provide the applicant with a copy of their right to dispute the contents of the report, who to contact HW to do so. Applications will also have the opportunity to provide a supplemental statement.

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

HIDDEN WONDERS, LLC

<u>POLICY</u>

<u>CONCERNING</u>

<u>QUALIFICATIONS</u>

<u>AND TRAINING</u>

Qualifications and Training

Hidden Wonders ("HW") only hires Staff who comport with HW's background check. HW's staff meet minimum age requirements of being twenty-one (21) years of age or older and have completed and shall maintain Responsible Vendor Training Program certification, all as promulgated by the Commission under 935 CMR 500.105(2)(b).

HW requires that all Staff shall, at a minimum, receive eight (8) hours of on-going training each year.

HW policy requires that all new employees involved in the handling and sale of cannabis for adult use shall successfully complete a Responsible Vendor Program within ninety (90) days of hire.

HW maintains records of responsible vendor training program compliance for four (4) years and can make them available to inspection by the Commission and any other applicable licensing authority upon request during normal business hours.

All HW staff will have a working knowledge of the related cannabis law, rules and regulations, including local regulations. Managers (assistant and supervisor level) will be responsible for ensuring all HW Staff follow such obligations.

HW will employ a Compliance Officer who will oversee hiring and training of all Staff and will conduct periodic compliance checks to ensure Staff has retained such knowledge.

Managers and the Compliance Officer are expected to have some post high school education. Staff are expected to have attained a high school diploma or its equivalent.

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

HW will also ensure that all of its employees are suitable for registration consistent with the provisions of 935 CMR 500.802.

Marijuana Establishment Agent Training
(a) Marijuana Establishments shall ensure that all marijuana establishment agents complete training prior to performing job functions. Training shall be tailored to the roles and responsibilities of the job function of each marijuana establishment agent, and at a minimum must include a Responsible Vendor Program under 935 CMR 500.105(2)(b). At a minimum, staff shall receive eight (8) hours of on-going training annually.

Responsible Vendor Training

1. On or after July 1, 2019, all current owners, managers and employees of a Marijuana Establishment that are involved in the handling and sale of marijuana for adult use at the time of licensure or renewal of licensure, as applicable, shall have attended and successfully completed a responsible vendor program to be designated a "responsible vendor."
2. Once a licensee is designated a "responsible vendor," all new employees involved in the handling and sale of marijuana for adult use shall successfully complete a responsible vendor program within ninety (90) days of hire.
3. After initial successful completion of a responsible vendor program, each owner, manager, and employee involved in the handling and sale of marijuana for adult use shall successfully complete the program once every year thereafter to maintain designation as a "responsible vendor."
4. Administrative employees who do not handle or sell marijuana may take the "responsible vendor" program on a voluntary basis.
5. Marijuana establishments must maintain records of responsible vendor training program compliance for four (4) years and make them available to inspection by the Commission and any other applicable licensing authority upon request during normal business hours.

Certification Training Program Standards

a. No owner or employee of a responsible vendor program shall have an interest in a licensed Marijuana Establishment;
b. Program providers shall submit their programs to the Commission every two years for approval as a responsible vendor program;
c. The program shall include at least two (2) hours of instruction time;
d. The program shall be taught in a real-time, interactive classroom setting where the instructor is able to verify the identification of each individual attending the program and certify completion of the program by the individual identified;
e. The program provider shall maintain its training records at its principal place of business during the applicable year and for the following three (3) years;
f. The provider shall make the records available for inspection by the Commission and any other applicable licensing authority upon request during normal business hours;
g. The program shall provide written documentation of attendance and successful passage of a test on the knowledge of the required curriculum for each attendee;
h. Attendees who can speak and write English must successfully pass a written test with a score of 70% or better;
i. Attendees who cannot speak or write English may be offered a verbal test, provided that the same questions are given as are on the written test and the results of the verbal test are documented with a passing score of 70% or better; and
j. Program providers shall solicit effectiveness evaluations from individuals who have completed their program. Certification Training Class Core Curriculum.

a. Discussion concerning marijuana's effect on the human body. Training shall include:
    - i. Marijuana's physical effects based on type of marijuana product;
    - ii. The amount of time to feel impairment;
    - iii. Visible signs of impairment; and
    - iv. Recognizing the signs of impairment.

b. Diversion prevention and prevention of sales to minors, including best practices;

c. Compliance with all tracking requirements; and
d. Acceptable forms of identification. Training shall include:
    i. How to check identification;
    ii. Spotting false identification;
    iii. Medical registration cards issued by the DPH;
    iv. Provisions for confiscating fraudulent identifications; and
    v. Common mistakes made in verification.
e. Other key state laws and rules affecting owners, managers, and employees, which shall include:
    i. Local and state licensing and enforcement;
    ii. Incident and notification requirements;
    iii. Administrative and criminal liability;
    iv. License sanctions and court sanctions;
    v. Waste disposal;
    vi. Health and safety standards;
    vii. Patrons prohibited from bringing marijuana onto licensed premises;
    viii. Permitted hours of sale;
    ix. Conduct of establishment;
    x. Permitting inspections by state and local licensing and enforcement authorities;
    xi. Licensee responsibilities for activities occurring within licensed premises;
    xii. Maintenance of records;
    xiii. Privacy issues; and
    xix. Prohibited purchases and practices.
f. Such other areas of training determined by the Commission to be included in a responsible vendor training program.

HIDDEN WONDERS, LLC

POLICY CONCERNING QUALITY CONTROL AND TESTING

Quality Control and Testing

Hidden Wonders does not sell any marijuana and marijuana products unless that marijuana or marijuana product has passed testing, and Hidden Wonders keeps a record of test results for each batch of marijuana and marijuana products.

Hidden Wonders inspects all marijuana and marijuana products for any sign of contamination. Any marijuana that appears contaminated is REJECTED by Hidden Wonders and RETURNED to the vendor – regardless of testing results. Hidden Wonders understands that vendors can cheat on the
tests, and accordingly, Hidden Wonders's first line of defense is a visual inspection.

Hidden Wonders only purchase from trusted vendors, and from vendors who strictly comply with the regulations pertaining to testing of marijuana and marijuana product.

Hidden Wonders ensures that all marijuana product, including marijuana, offered for sale or otherwise marketed for adult use has been tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

Hidden Wonders maintains a Test Log for all marijuana product, including marijuana, offered for sale or otherwise marketed for adult use by Hidden Wonders.

The Test Log and Hidden Wonders's policy describes the acceptable contaminant levels established in the DPH protocols identified in 935 CMR 500.160(1).

Hidden Wonders's policy requires that the Commission is notified within seventy-two (72) hours of any laboratory testing results indicating that contamination cannot be remediated, and Hidden Wonders requires disposing of the contaminated marijuana product.

Hidden Wonders's policy recognizes that the notification to the Commission must come from Hidden Wonders AND from both the Independent Testing Laboratory, separately and directly. Hidden Wonders understands that the notification from Hidden Wonders must describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

Hidden Wonders maintains all test records and the Test Log for no less than one (1) year.

In addition, Hidden Wonders establishes the additional policies and procedures concerning Quality Control and Testing Procedures:

To the extent Hidden Wonders receives marijuana product requiring further processing and packaging Hidden Wonders shall only utilize the leaves and flowers of the female marijuana plant to be processed accordingly in a safe and sanitary manner in that all product shall be:

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

Hidden Wonders requires all agents whose job includes contact with marijuana be compliant with the requirements for food handlers specified in 105 CMR 300.000.

Hidden Wonders’s policy requires any agent working in direct contact with marijuana shall conform to sanitary practices while on duty, including:

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

Hidden Wonders supervisors shall ensure all agents are properly trained and monitored for compliance with all such requirements.

Hidden Wonders’s dispensary shall have hand-washing facilities located in production areas and where good sanitary practices require employees to wash and sanitize their hands. HW will work with the local board of health and CCC for proper placement of such facilities.

Hidden Wonders’s policy requires it shall always provide sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations.

Hidden Wonders’s waste disposal policy requires all litter and waste shall be properly removed in appropriate bins who are located so as to minimize the development of odor and the potential for the waste attracting and harboring pests.

Hidden Wonders’s facility shall be constructed in such a manner that they may be adequately kept clean and in good repair, this includes all flooring, walls, and ceilings.

Hidden Wonders’s policy requires all contact surfaces, shall be maintained, cleaned, and sanitized as frequently as necessary to protect against contamination. Hidden Wonders will maintain a log ensuring proper opening and closing procedures and daily maintenance to ensure all such surfaces are properly maintained and cleaned.

Hidden Wonders’s policy maintains that all toxic items shall be identified, held, stored and disposed of in a manner that protects against contamination of marijuana.

Hidden Wonders’s proposed location has sufficient water supply for necessary operations but hereby establishes a policy that the water supply shall be maintained such that it will always be sufficient for operations.

Hidden Wonders's policy ensures that the plumbing equipment will be of adequate size and design and maintained to carry sufficient quantities of water to required locations throughout the establishment. Hidden Wonders will maintain a maintenance log of inspections and repairs completed to the plumbing service to ensure the system is maintained as required.

Hidden Wonders's policy requires it provide and maintain for its employees adequate and readily accessible toilet facilities. Such facilities are part of the proposed location's final plans.

Hidden Wonders's policy requires the storage and transportation of finished products to be held and maintained under conditions that protect them against physical, chemical, and microbial contamination.

HIDDEN WONDERS, LLC

POLICY CONCERNING
MAINTENANCE OF FINANCIAL RECORDS

Maintenance of Financial Records

Hidden Wonders ("HW") maintains all records onsite, available for inspection by the Commission, upon request.

HW's records are maintained in accordance with generally accepted accounting principles.

Hidden Wonders maintains all Business Records required in any section of 935 CMR 500.000, in addition to the following which shall include manual or computerized records of:

Written business records, available for inspection, and in accordance with generally accepted accounting principles, which will include manual or computerized records of:

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

Cash management will be developed within the Security Plan and shall remain confidential to HW's management and staff. Frequency and timing of cash deposits to be made to financial institutions shall be randomized for security purposes.

Seed to sale tracking systems as approved by the Commission shall be implemented which will support HW's payment of state and local sales tax and other obligations.

HW's confidential information will be kept in a secure location, separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the Commission may access this information to carry out its official duties.

All sales recording requirements under 935 CMR 500.140(6) are followed, including:

- Utilizing a point-of-sale (POS) system approved by the Commission, in consultation with the DOR, and a sales recording module approved by DOR;
- Conducting a monthly analysis of its equipment and sales date, and maintaining records, available to the Commission upon request, that the monthly analysis has been performed;
- Complying with 830 CMR 62C.25.1: *Record Retention* and DOR Directive 16-1 regarding recordkeeping requirements;
- Adopting separate accounting practices at the point-of-sale for cannabis and cannabis product sales, and non-cannabis sales; and

- Maintaining such records that would allow for the Commission and the DOR to audit and examine the point-of-sale system used in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.

Additional written business records will be kept, including, but not limited to, records of:

- Compliance with liability insurance coverage or maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16); and
- Fines or penalties, if any, paid under 935 CMR 500.550 or any other section of the Commission's regulations.

HIDDEN WONDERS, LLC

OPERATIONS PROCEDURE ON ENERGY COMPLIANCE

Overview

Hidden Wonders("HW") will employ various strategies to reduce energy consumption where available and in compliance with CCC regulations.

HW will employ a Compliance Officer to review energy consumption on a quarterly basis. HW's Compliance Officer will report such findings in monthly team meetings with management and staff and discuss existing energy usage and ways to reduce energy usage. Managers and staff will be trained to report to the Compliance Officer any strategies developed to reduce energy usage and the Compliance Officer and the Management shall be responsible to approve and implement such strategies.

In the event the facility requires any further upgrades, renovations or expansions, HW will hire the necessary design, construction and engineering professionals to identify potential energy savings opportunities and implement such opportunities as available and cost effective. HW policy requires HW to identify and document any renewable or alternative energy opportunities as part of any upgrades, renovations or expansions.

In the event of an equipment failure requiring replacement, HW policy requires a review by HW's Compliance Officer and management to identify and document potential energy savings available prior to replacement. HW will maintain documentation energy savings was considered and information justifying the final decision concerning such replacement.

Within the first 12 months of operation and no less than annually thereafter, HW will document its 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 and its consideration of energy supply decisions and regularly (no less than annually) evaluate renewable options;

HW's Compliance Officer shall conduct an ongoing review of HW's energy demand and report to management any inefficiencies in current energy usage identified and to research solutions to reduce electric demand (such as lighting schedules, active load management, and energy storage); The Compliance Officer shall implement a method of energy monitoring and reporting to management and in consultation with management to implement such adjustments to operations based on such compiled data; The Compliance Office shall review and implement procedures for participation in load curtailment, energy storage, or other active demand management programs (as applicable). As part of such reviews and reporting, the Compliance Officer shall communicate with existing and proposed utilities to identify and implement any available energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants. The Compliance Officer shall provide a quarterly report to management regarding his/her research of available programs.

HIDDEN WONDERS, LLC

POLICY CONCERNING
RECORD KEEPING PROCEDURES

Record Keeping Procedures

Hidden Wonders's ("HW") policies and procedures for recordkeeping and record retention will comply with all CCC regulations to safeguard and maintain vital documents. Upon request or by audit, the Company will provide written records to the CCC. Under supervision of the Chief Compliance Officer, working with the HR Manager and Inventory Manager, HW will file records in a secure, limited access area.

HW will employ a quarterly review of all retained records to ensure compliance. This review will include corporate, employee and business documents.

Under direct supervision of the Chief Compliance Officer, the procedures will also be kept current and internally inspected by the executive management team as a part of Hidden Wonders's overall facility maintenance, conducted annually.

Corporate Records
Corporate records are defined as records that require, at a minimum, regularly scheduled annual reviews, updates, and renewals. These records include the Cannabis Control Commission's annual compliance requirements for marijuana establishment registration, agent registration, and employee background check documentation. Hidden Wonders will comply with all corporate governance requirements: Secretary of State filings and annual reports. HW will ensure its business operations with polices for general liability, directors & officers (D&O), product liability, workers compensation, employer professional liability and umbrella coverage. Hidden Wonders's host community local compliance will include any and all variances, as-built drawings, site plan approvals, special permits and certificate of occupancy.

HW will maintain all records required in any section of 935 CMR 500.000, in addition to the following: Written operating procedures as required by 935 CMR 500.105(1); inventory records as required by 935 CMR 500.105(8); and seed-to-sale tracking records for all cannabis products as required by 935 CMR 500.105(8)(e).

Personnel Records
HW will maintain detailed personnel records, which will include the following:

- Job descriptions for each employee and volunteer position, along with organizational charts consistent with the job descriptions;
- A personnel record for each HW Staff member. These records will be maintained by HW for at least twelve (12) months after termination of the individual's affiliation with HW and shall include, at a minimum, the following:
    - all materials submitted to the Commission pursuant to 935 CMR 500.030(2);
    - the job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision for that position;
    - documentation of periodic, regular performance evaluations;
    - documentation of verification of references;
    - 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;
    - a record of any disciplinary action taken; and
    - notice of completed responsible vendor and eight (8) hour related duty training.

HW maintains a staffing plan that demonstrates accessible business hours and safe working conditions.

HW maintains personnel policies and procedures; and all background check reports obtained in accordance with 935 CMR 500.030.

Business Records
HW will maintain detailed Business Records, which shall include electronic or hard copies of, at a minimum:

- Salary and wages paid to each employee, any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with any HW vendors, including members, if any;
- Assets and liabilities;
- Books of accounts, which shall include ledgers, journals, and supporting documents, invoices, checks, agreements, and vouchers;
- Monetary transactions;
- Sales records including the quantity, form, and cost of cannabis products; and
- Waste disposal records as required under 935 CMR 500.105(12).

Handling and Testing of Marijuana Records
HW will maintain the results of all cannabis testing a minimum of one (1) year.

Inventory Records
HW's record of each inventory will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the agents who conducted the inventory.

Seed-to-Sale Tracking Records

- HW will use seed to sale software to maintain real-time inventory. HW's seed-to-sale inventory reporting will meet the requirements specified by the Commission and 935 CMR 500.105(8)(c) and (d), including, at a minimum, an inventory of all cannabis and cannabis-related products ready for dispensing; as well as all damaged, defective, expired, or contaminated cannabis and cannabis products awaiting disposal.
- Inventory records will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory.

Incident Reporting Records

- Within ten (10) calendar days, HW will provide written notice to the Commission of any incident described in 935 CMR 500.110(7)(a). HW will do this by submitting an incident report, detailing the incident, the investigation, the findings, resolution (if any), confirmation that the Police Department and Commission were notified within twenty- four (24) hours of discovering the breach, along with any other relevant information.

Visitor Records
All visitors must be logged in and out and that log shall be available for inspection by the Commission at all times. A visitor sign-in and sign-out record will be maintained at the security office. The record will include the visitor's name, address, organization or firm, date, time in and out, and the name of the authorized agent who will be accompanying the visitor.

Security Records

- HW will make a current list of authorized agents and service personnel that have access to the surveillance room available to the Commission upon request.
- HW will make available for immediate viewing by the Commission upon request all twenty-four (24) hour recordings from all video cameras that are kept for a minimum of ninety (90) calendar days.

Transportation Records
HW will retain all shipping manifests for no less than one (1) year. These records will be made available to the Commission upon request.

Agent Training Records
Documentation of all required training, including training regarding privacy and confidentiality requirements, and a signed statement of the individual indicating the date, time, and location where they were trained, the topics discussed and the name(s) and title(s) of the presenter(s).

Records Closure Policy
In the event HW closes its operations, all records will be kept for at least two (2) years at HW's expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission.
In addition, the Company will communicate with the CCC during the closure process and accommodate any additional requests the CCC or other agencies may have.

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

- A list of all executives of the Company, and members, if any, of the licensee must be made available upon request by any individual. 935 CMR 500.105(1)(m) requirement may be fulfilled by placing this information on the Company's website;
- Description of the various strains of marijuana to be cultivated, sold, or processed, as applicable, as well as the form(s) in which marijuana will be dispensed;
- A staffing records and staffing plan in compliance with 935 CMR 500.105(9);

- A description of the Company's hours of operation and after-hours contact information, which will be provided to the CCC, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000;
- Policies and procedures for the handling of cash on Company premises including but not limited to storage, collection frequency and transport to financial institution(s);
- Storage of marijuana in compliance with 935 CMR 500.105(11);
- Agent security policies, including crime prevention and personal safety techniques;5o Security measures in compliance with 935 CMR 500.110;
- Policies and procedures to prevent the diversion of marijuana to individuals younger than twenty-one (21) years old;
- Policies for an alcohol, smoke, and drug-free workplace;
- Quality control plans, including product testing for contaminants in compliance with 935 CMR 500.160;
- Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.160;
- Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
- A plan describing how confidential information will be maintained; and
- Policy for the immediate dismissal of any dispensary agent who has:
    - Been convicted, 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;
    - Diverted marijuana, which will be reported the Police Department and to the CCC; or
    - Engaged in unsafe practices with regard to Company operations, which will be reported to the CCC.

Record Retention
As a retailer, HW will comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements.

Personnel Policies, Including Background Checks
HW will maintain personnel records as a separate category of records due to the sensitivity and importance of information concerning agents, including registration status and background check records. HW will keep, at a minimum, the following personnel records:

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

For more detailed information about HW's personnel policies, including procedures related to background checks, please refer to the section titled *Personnel Policies Including Background Checks*.

HW only hires Staff who comport with the background regulations promulgated by the Commission.

HW policy requires the IMMEDIATE DISMISSAL any Staff member who: 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 HW, 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.

HW policy requires that HW obtain certification as a Responsible Vendor.

HW requires that all Staff take and complete a Responsible Vendor Training under 935 CMR 500.105(2)(b). At a minimum, HW Staff shall receive eight (8) hours of on-going training annually.

HW policy requires that all new employees involved in the handling and sale of marijuana for adult use shall successfully complete a responsible vendor program within ninety (90) days of hire.

HW maintains records of responsible vendor training program compliance for four (4) years and can make these records available to inspection by the Commission and any other applicable licensing authority upon request during normal business hours.

HIDDEN WONDERS, LLC

POLICY CONCERNING RESTRICTION OF ACCESS TO PERSONS AGED 21 AND OLDER

Restricting Access to 21 and Over

As per 935 CMR 500.140 (2) On-premises Verification of Identification for Adult Use Only Locations, upon entry into HW's retail premises by an individual, a HW agent shall immediately inspect the individual's proof of identification and determine the person's age. No one shall *not* be admitted to the premises unless the retailer has verified that the person is 21 years of age or older by an individual's proof of identification.

Hidden Wonders's ("HW's") retail store's layout is designed to enable access to consumers with a verified and valid, government-issued photo ID or in possession of a Program ID Card demonstrating the individual is a registered qualifying patient with the Medical Use of Marijuana Program.

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

HW will stop all persons entering the store to determine whether that person may legally enter the premises. All persons must first be verified in the Entry Room. The Entry Room is physically separated from the Store by a closed, and locked door.

Any persons who cannot provide the required legal proof that they are aged **21 years or older** shall be DENIED ENTRY and politely turned away, with an explanation that the law requires all persons entering HW be **21 years or older**.

In the event HW discovers any of its agents intentionally or negligently sold marijuana to an individual under the age of 21, the agent will be immediately terminated, and the Commission will be promptly notified, pursuant to 935 CMR 500.105(1).

Furthermore, HW will not hire any individuals who are under the age of 21 or who have been convicted of distribution of controlled substances to minors, pursuant to 935 CMR 500.030(1).

Pursuant to 935 CMR 500.105(4), HW will not engage in any marketing, advertising or branding practices that are targeted to, deemed to appeal to or portray minors under the age of 21.

HW will not engage in any advertising, marketing and branding via television, radio, internet, mobile applications, social media, or other electronic communication, billboard or other outdoor advertising, including charitable, sporting or similar events, unless at least 85% of the audience is reasonably expected to be 21 years of age or older as determined by reliable and current audience composition data.

HW will not manufacture or sell any edible products that resemble a realistic or fictional human, animal or fruit, including artistic, caricature or cartoon renderings, pursuant to 935 CMR 500.150(1)(b).

In accordance with 935 CMR 500.105(4)(a)(5), any marketing, advertising and branding materials for public viewing will include a warning stating, "For use only by adults 21 years of age or older. Keep out of the reach of children. Marijuana can impair concentration, coordination and judgment. Do not operate a vehicle or machinery under the influence of marijuana."

Pursuant to 935 CMR 500.105(6)(b), HW's packaging for any cannabis or cannabis products will not use bright colors, resemble existing branded products, feature cartoons or celebrities commonly used to market products to minors, feature images of minors or other words that refer to products commonly associated with minors or otherwise be attractive to minors.

HW's website will require all online visitors to verify they are 21 years of age or older prior to accessing the website, in accordance with 935 CMR 500.105(4)(b)(13).

HW will contract with a third-party security company for provision of trained security personnel.

HW's security personnel will require verification that the individual desiring to enter HW are aged **21 years or older**.

HW's security personnel will use the electronic card reader to verify the identification offered by the individual desiring to enter HW.

HW's security personnel will use the Blacklight to examine and verify the identification offered by the individual desiring to enter HW. The Blacklight will often illuminate evidence that the identification has been altered. In the event that an offered identification displays obvious signs of tampering HW staff shall not honor the identification. HW staff shall DENY ENTRY and politely turn that person away, with an explanation that the law requires all persons entering HW to provide acceptable proof that the individual is **21 years or older**.

Customers are only to be allowed entry into the door exiting the Entry Room once they have satisfactorily proved that they are **21 years or older**.

Further, HW Staff shall DENY ENTRY and shall REFUSE to sell cannabis products to a consumer if, in the opinion of the Staff, and based on the information available to the agent at that time, <u>the consumer or the public would be placed at risk</u>.

Clearly intoxicated or impaired persons shall be DENIED ENTRY.

HIDDEN WONDERS, LLC

<u>PERSONNEL POLICY</u>

Overview
Hidden Wonders ("HW") will only hire Staff (a/k/a "Agents" and/or "Employees") who comply with background regulations disseminated by the Commission.

<u>Agent Personnel Records</u>
HW will maintain employee records for each agent for at least twelve (12) months after termination of the agent's affiliation with HW and records will include, but not limited to:

- All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
- The job description or employment contract that includes descriptions of the agent's duties, authority, responsibilities, qualifications, and supervision;
- Required training, including training regarding privacy and confidentiality requirements, and the signed statement of the person indicating the date, time, and place the agent received said training;
- Performance evaluations;
- Records of any disciplinary action taken;
- Background investigation, including CORI reports;
- Documentation of all security related events (including violations) and the results of any investigations and description of remedial actions, restrictions, or additional training required as a result of an incident.

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

HW policy requires the IMMEDIATE DISMISSAL any Staff member who:

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 HW, 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.

HW policy requires that it obtain certification as a Responsible Vendor.

HW requires all Staff take and complete a Responsible Vendor Training under 935 CMR 500.105(2)(b). At a minimum, HW Staff shall receive eight (8) hours of on-going training annually.

HW policy requires that all new employees involved in the handling and sale of marijuana for adult use shall successfully complete a responsible vendor program within ninety (90) days of hire.

HW will maintain records of responsible vendor training program compliance for four (4) years and can make them available to inspection by the Commission and any other applicable licensing authority upon request during normal business hours.

Job Descriptions

Chief Executive Officer/Chief Financial Officer: The CEO/CFO shall provide overall leadership and vision for Hidden Wonders. The CEO/CFO will work with and support the executive management team and employees to assure that HW sets reasonable business and community benchmarks, in order to achieve its goals and fulfill its mission. CEO/CFO duties will include but are not limited to the following:

- Work as the team leader with other executives and employees to review HW's business and community objectives, and implement plans to achieve those objectives;
- Lead HW's interactions with state regulators and municipal officials;
- Oversee the company's financial operations and associated responsibilities related to Hidden Wonders's Certified Tax Accountants;
- With the Chief Operating Officer/Chief Compliance Officer (COO/CCO), oversee compliance with Massachusetts law and regulations, including 935 CMR 500.000 et seq.;
- With the COO/CCO, oversee compliance with 935 CMR 500.105(2)(b), including all Responsible Vendor Training requirements for employees;
- Develop, oversee and execute a staffing plan and certain hiring protocols;
- Develop and implement personnel policies and procedures;
- Develop protocols to attract, hire, advance, discipline and terminate employees and volunteers as needed to support HW's operations;
- Ensure compliance with all workplace policy laws and requirements;
- With the COO/CCO to oversee ongoing compliance with the provisions of 935 CMR 500.101(2)(e)(8);
- With the COO/CCO, oversee operating procedures to assure ongoing compliance with the provisions of 935 CMR 500.105(1);
- Work with the executive management team and the COO/CCO to implement a plan to prevent the diversion of product in accordance with the applicable regulations, including 935 CMR 500.101 and 935 CMR 500.105;
- Work with the executive management team and the COO/CCO to implement a diversity plan that promotes equity among minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientations;
- Work with HW's HR Manager and department mangers, ensure the Diversity Plan and Community Initiatives; and
- Work with HW's HR Manager and department managers to implement HW's Plan to Positively Impact Areas of Disproportionate Impact.

Chief Operating Officer/Chief Compliance Officer: In this combined role, the COO/CCO shall operate and be responsible for the maintenance, staffing and ongoing operation of the retail facility. COO/CCO duties shall include:

- Work with the CEO/CFO to manage financial reporting and budgeting;

- Oversee policies and procedures relating to the retail facility;
- Work with the Security Director to oversee background check process on all employees in a manner consistent with Massachusetts law and regulation, including 935 CMR 500.000;
- Coordinate all staff work hours, assignments and collaborations;
- Develop plan to meet the demands of the business;
- Manage HW's human resources team;
- Manage payroll administration;
- Supervise accounting and payables functions;
- Oversee tax preparation and auditing in conjunction with the CEO/CFO and Certified Tax Accountant;
- Ensure quality control and testing of marijuana flower in compliance with 935
- CMR 500.160;
- With the CEO/CFO to uphold company and facility compliance with Massachusetts law and regulations, including 935 CMR 500.000 et seq.;
- With the CEO/CFO to facilitate HW's interactions with state regulators and municipal officials;
- Ensure compliance with 935 CMR 500.105(2)(b), including all Responsible Vendor Training requirements for employees;
- Prepare and amend as needed a HW plan to assure ongoing compliance with the provisions of 935 CMR 500.101 et seq.;
- Prepare and amend as needed a set of detailed written operating procedures to assure ongoing compliance with the provisions of 935 CMR 500.105(1);
- Keep and maintain all HW records, making them available for inspection by the Commission, upon its request, in accordance with 935 CMR 500.105(9);
- In collaboration with the Director of Security, implement and administer background checks and suitability determinations on all HW employees in a manner consistent with Massachusetts law and regulation, including 935 CMR 500.000;
- Review background checks prior to any employee start date, and before any employee is granted access to any HW facility in a manner consistent with Massachusetts law and regulation, including 935 CMR 500.100; and
- Register each employee with DCJIS pursuant to 803 CMR 2.04 to determine suitability.

Security Director: Under the supervision of the CEO/CFO, the Security Director will be responsible for the development and overall management of the Security Policies and Procedures for HW, while implementing, administering, and revising the policies as needed.

To further ensure employee suitability, HW's Security Director will:

- Review any and all conditions, offenses, and violations occurring in Massachusetts or any other state, whether under state law or under the laws of the United States, or the law of any military, territorial or Native American tribal authority, or any other jurisdiction.
- Review any and all criminal disqualifying conditions, offenses, and violations, including

the crimes of attempt, accessory, conspiracy, and solicitation.

- Where applicable, review all look back periods for criminal conditions, offenses, and violations included in 935 CMR 500.802 commence upon the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look back period will commence upon release from incarceration.
- Not consider juvenile dispositions as a factor for determining suitability.
- Ensure compliance with all provisions of 935 CMR 500.110;
- Train and supervise security agents;
- Provide staffing, shift change and general oversight of security operations;
- Review and ensure proper maintenance of all security apparatus, including
- physical, human and technological security methods and equipment;
- Ensure that all required background checks have been completed and documented prior to an agent performing job functions; ensure agent is granted appropriate level of access to the facility necessary to complete his/her job functions;
- Review and approve incident reports and other reports written by Security Agents prior to submitting to the executive management team—follow up with security agent if needed;
- Provide training specific for Security Agents prior to commencing job functions;
- Maintain frequent contact with state inspectors and local law enforcement authorities;
- Maintain lists of agents authorized to access designated areas of the HW facility, including cash and product storage vaults, the surveillance and network equipment room, and other highly sensitive areas of the HW facility;
- Lead a management team to ensure policies and procedures are properly implemented, integrated, effective, and relevant to ensure the safety of HW agents and assets;
- Maintain all security-related records, incident reports and other reports written by security agents; and
- Evaluate and determine the number of security agents assigned to each shift and proper shift change times.

<u>Security Agent:</u> Security Agents will monitor HW's security systems including alarms, video surveillance, and motion detectors. Security Agents will ensure only authorized people are permitted access to the HW facility. Security Agents will verify appropriate ID cards and other forms of identification. Security Agents will also perform the following duties and other duties as needed:

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

- Escort authorized visitors in HW's restricted access areas.

Human Resources Manager: HW's HR Manager will support the executive management team. The HR Manager will implement all personnel policies and procedures for HW, including hiring processes. The Human Resources Manager will also:

- Oversee hiring and release of HW agents;
- Ensure compliance with any and all workplace policy laws and requirements;
- Review and revise HW personnel policies and procedures in consultation with the executive management team and department managers;
- Handle any and all agent discipline as needed;
- Develop training schedules and policies for HW agents under the supervision of the executive management team and department managers; and
- Be responsible for additional human resources tasks decided by HW's executive management team.
- Oversee HW's Diversity Plan and Community Initiatives;
- Oversee HW's Plan to Positively Impact Areas of Disproportionate Impact;
- Comply with State anti-discrimination statutes and Equal Employment Opportunity Commission (EEOC) requirements;
- Working with the Chief Compliance Officer, employ reporting of criminal convictions (and termination if necessary);
- Comply with the State and Federal Family Leave Act;
- Comply with Workplace Safety Laws;
- Instate Workers' Compensation;
- Working with the Chief Compliance Officer, employ the Background Check process for all employees;
- Comply with State and Federal Minimum Wage Requirements; and
- Comply with any other applicable local, state, or federal employment laws, rules, or regulations.

Inventory Manager: The Inventory Manager will oversee HW's inventory on a day-to-day basis. The Inventory Manager will be responsible for weekly and monthly inventory counts and waste disposal requirements. The Inventory Manager will perform a yearly comprehensive inventory together with the executive management team. Additional duties include, but are not limited to:

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

Inventory Associate: Inventory Associates support the Inventory Manager during HW's daily operations. Responsibilities will include:

- Ensuring all products are properly stored, labeled, and recorded in HW inventory system;

- Maintaining records, including operating procedures, inventory records, audit records, storage and transfer records;
- Ensuring waste is properly stored;
- Maintaining documents with each day's beginning, acquisitions, sales, disposal and ending inventory; and
- Coordinating the waste disposal schedule and ensuring HW's policies and procedures for waste disposal are followed.

Retail Manager: Manages all HW Member Services Agents and oversees day-to-day operations of HW's retail facility. Other responsibilities and duties will include:

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

Retail Agent: Ensures that each HW customer is treated with respect while at a HW facility. Responsible for making sure that each customer receives the appropriate amount of individualized attention in order to address their specific needs and questions. Job responsibilities include:

- Being knowledgeable of the various products that HW offers;
- Understanding and acknowledging individual customer goals;
- Maintaining a clean, safe, healthy, and productive environment so that customers have a positive experience;
- Answering customer questions related to products including flowers, concentrates, tinctures, and edibles;
- Enforcing and executing compliance with Commission regulations and HW policies and procedures;
- Setting up product displays based on HW policies and procedures;
- Understanding sales transactions using HW systems;
- Participating in ongoing education and professional development; and
- Reconciling cash from daily sales transactions, sales reports, and other forms of day-to-day task management.

HW will follow 935 CMR 500.030(2) regarding agent personnel records during the application process, including any requirements and other information required by the Commission, and in compliance with state and federal laws related to all HR-related activities.

Standards of Conduct

HW will not tolerate harassment or discrimination on the basis of sex, race, color, national origin, age, religion, disability, sexual orientation, gender identity, gender expression, or any other trait or characteristic protected by any applicable federal, state, or local law or ordinance.

All HW managers and employees will be expected to maintain the highest degree of professional behavior and standards.

Workplace Attire
HW's new hire training and the onboarding process will discuss specific workplace attire for each role. The HR Manager and department managers will ensure compliance with all requirements related to workplace attire.

At-Will Employment
HW's policy is to support is at-will unless otherwise stated, as consistent within the Commonwealth of Massachusetts.

Violence and Weapons
Weapons are not allowed on site by employees, customers, or visitors. In the case of a violent event or threat, law enforcement will be contacted immediately. Any employee found carrying a weapon on the premises of a HW facility will be immediately terminated.

Hours of Operation

Monday: 8:00 a.m. – 9:00 p.m.

Tuesday: 8:00 a.m. – 9:00 p.m.

Wednesday: 8:00 a.m. – 9:00 p.m.

Thursday: 8:00 a.m. – 9:00 p.m.

Friday: 8:00 a.m. – 9:00 p.m.

Saturday: 8:00 a.m. – 9:00 p.m.

Sunday: 8:00 a.m. – 9:00 p.m.

Personnel Policies and Procedures

Standard Employment Practices
HW believes that it can attract a better workforce and increase employee retention by employing workplace satisfaction by offering highly competitive wage and benefits packages and developing a culture that values a proper work-life balance. HW is committed to hiring a management team that works one on one with their subordinates to foster a work ethic that focuses on the mission of the company and spirit of the adult-use marijuana program in Massachusetts.

Investigations
The HR Manager, working with the Chief Operating Officer/Chief Compliance Officer, will create and implement policies and procedures to investigate any complaints or concerns identified or raised internally or externally in order to stay compliant with 935 CMR 500.000 et. seq.

Compliance with Law and Regulation
TM's written policies shall adhere to applicable federal and state laws, including but not limited to the Family and Medical Leave Act, the Consolidated Omnibus Budget Reconciliation Act, the Equal Employment Opportunity Act, the Employee Retirement Income Security Act, the

Americans with Disabilities Act, 935 CMR 500.000 et. seq., and with laws pertaining to holidays, work hours, personal time, paid time off, confidentiality and workplace safety. The executive management team oversees company compliance, and the CEO/CFO shall implement company policies and procedures.

Job Classifications

Positions at HW are categorized by rank and department. HW's executive management team will be responsible for the overall success of the company's mission. The CEO/CFO shall be responsible for implementing HW's vision and mission. The entire executive management team will work closely together to ensure that each HW department executes its functions and responsibilities in a proper and professional manner. Job classification will consist of three tiers: Executive Management, Management, and Non-Management Employee.

Work Schedules

Work schedules will be either part-time, full-time, or salaried, depending on the specific position. Schedules will be set according to the needs of each department and will be determined by the respective department manager and the executive manager to whom they report. It will be the department manager's responsibility to develop and implement a work schedule that provides necessary duty and personnel coverage while not exceeding each role's requirements for full execution of HW day-to-day operations. The department manager must also make sure that adequate coverage occurs on a daily basis and does not lead to abuse or unnecessary use of overtime.

Performance Reviews

Performance reviews will be conducted by executive or department managers. Reviews will be conducted at three-month intervals for new employees during the first year. After the initial three-month period, reviews will occur at six-month intervals. Employees under review will receive a written summary of their performance. Reviews must be kept in each employee's employment file. Performance reviews must highlight both positive performance factors as well as areas that need improvement. HW may use scoring systems to determine an employee's overall performance.

Advancement & Compensation

Employee participation in training and bi-annual performance evaluations will be required for any promotions or pay increases. Compensation shall be negotiated on an individual basis. HW shall determine compensation based on the prevailing wage in the marketplace. Compensation shall account for skill, experience, education, work history and other lawful criteria as determined by HW. The CEO/CFO and the executive management team shall determine compensation rates. HW shall at all times comply with applicable state and federal law in determining employee compensation.

Mandatory Meetings and Community Service Days

Each month, HW will conduct mandatory, repeating company-wide meetings. Certain personnel, such as housekeeping staff, may not be required to attend every meeting. Department managers will determine employee attendance. Department managers will also schedule and conduct mandatory weekly meetings. Department managers will provide agendas for all meetings and will report in writing to their executive manager on the results and progress of each meeting.

Breaks

HW employees will be allowed to take daily breaks, including lunch breaks, according to the laws of the Commonwealth.

Leave Policies

HW leave policies will comply with all applicable state and federal statutes. All full-time employees will receive two (2) 40-hour weeks of paid vacation annually. Leave must be requested at least two (2) weeks in advance and approved by the CEO/CFO or designee. HW anticipates observing all national holidays and will elect on an annual basis whether to observe state holidays.

Disciplinary Policy

HW has adopted a disciplinary policy designed to provide a graduated series of corrective actions. This policy, called the "Steps" policy, is intended to improve employee performance, promote the maintenance of a cohesive and productive workplace, and prevent recurring adverse behaviors. In addressing disciplinary matters, HW shall apply the steps described below:

Step 1: Individual Advice and Counsel

A member of the executive management team shall individually discuss the subject conduct with the employee. The executive shall identify the offending conduct, and clearly outline company expectations for resolution.

Step 2: Written Warning

Within seven (7) days of the discussion described in Step 1, the executive will prepare a document characterizing the discussion, and will provide a copy of the document to the employee. The employee will sign the document, a copy of which HW will maintain in the personnel file.

Step 3: Final Written Warning

Should the offending conduct persist or reoccur, a member of the executive management team will prepare a document characterizing the offending conduct, and will provide a copy of the document to the employee. The document may include witness statements or reference other evidence. The document will state "Final Warning" in prominent text. The employee will sign the document, a copy of which will maintain in the HW personnel file. If the executive finds the offending conduct problematic, disruptive and/or harmful, or implicants the health or safety of other employees, the executive may recommend to the CEO/CFO that the employee be removed from the workplace. The CEO/CFO shall act on any such recommendation within forty-eight (48) hours.

Step 4: Termination of Employment

The last step is termination of employment. HW reserves the right to terminate if, notwithstanding the steps set forth above, employee conduct fails to comport with HW policies and procedures. HW reserves the right to terminate without prior notice or disciplinary action. The CEO/CFO must approve termination in writing, a copy of which HW will maintain in the personnel file.

Nothing in this policy provides any contractual rights regarding employee discipline or counseling. Nor should anything outlined in this policy should be read or understood as modifying or changing the employment-at-will relationship between HW and its employees.

Conduct Issues Not Subject to Progressive Discipline
Illegal behavior is not subject to progressive discipline and may be reported to local law enforcement. Examples of behavior that are not subject to progressive discipline and may be grounds for immediate termination include: theft, intoxication at work, fighting and other acts of violence.

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

Separation of Employment
A separating employee may contact the CEO/CFO or other supervising authority to schedule an exit interview. HW reserves the right to refuse any such interview. The interview, if any, shall occur on or after the employee's last day of work.

Return of Property
At the time of separation, HW employees must return all company property, examples of which can include cell phones, keys and key cards, identification cards, computers and/or laptops and uniforms. Failure to return certain items may result in deductions from that employee's final paycheck. All separating employees must also sign a Wage Deduction Authorization Agreement, which allows HW to deduct the costs of such items from their final paycheck.

Termination of Benefits
An employee separating from HW is eligible to receive benefits as long as the appropriate procedures are followed as outlined in this document. The employee must give two weeks' notice. The employee must work those final two work weeks in full. Any accrued vacation time will be paid in the last paycheck. Accrued sick leave will also be paid out in the last paycheck.

Health Insurance
Health insurance terminates on the last day of the month of employment, unless employee requests immediate termination of benefits. HW shall provide information about employee rights under the Consolidated Omnibus Budget Reconciliation Act (COBRA) relative to the continuation of health insurance coverage.

Agent Background Checks

In addition to completing the Commission's agent registration process, all agents hired to work for HW will undergo an extensive, detailed background investigation process before being allowed access inside HW or prior to beginning work duties, performed in accordance with 935 CMR 500.101(1).

Suitability determinations will be made in accordance with the procedures set forth in 935 CMR 500.800.

Upon adverse determination, HW will provide each applicant with a copy of their background screening report and a pre-adverse determination letter. This report and letter will provide the applicant with a copy of their right to dispute the contents of the report, who to contact HW to do so. Applications will also have the opportunity to provide a supplemental statement.

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

HIDDEN WONDERS, LLC

DIVERSITY PLAN

(NOVEMBER, 8, 2023)

Introduction

Hidden Wonders ("HW") believes in creating and sustaining a robust policy of inclusivity and diversity. HW recognizes that workforce diversity plays a vital part of its commitment to its community. Hidden Wonders is dedicated to creating a diverse culture. HW's diversity plan is designed to promote equity among people of color, particularly Black, African American, Hispanic, Latinx, Indigenous, women, veterans, people with disabilities, and LGBTQ+ people. HW will make every effort to employ and advance in employment qualified and diverse people at all levels within the company.

Impact Groups

Hidden Wonders intends to hire those individuals who meet the criteria set forth in the Commission's requirements for diversity, namely:

- Black, African American, Hispanic, Latinx, Indigenous;
- Women;
- Veterans;
- People with disabilities; and
- LGBTQ+.

Goals

#1. Hidden Wonders's Diversity Plan will hire and retain promote a diverse and inclusive group of employees with the following specific goals:

- Black, African American, Hispanic, Latinx, Indigenous (15%);
- Women (30%);
- Veterans (5%);
- People with disabilities (5%); and
- LGBTQ+ (5%).

#2. Contract with diverse businesses for the purchase of wholesale marijuana product and other services required for the operation and maintenance of the Company's marijuana establishment with the following specific goals:

- 25% of all contracts with businesses that are majority-owned or managed by women, minorities, veterans, persons with disabilities or who identify as LGBTQ+

Programs

#1. Diversity Recruitment and Sourcing

Hidden Wonders will build and maintain a workforce that is inclusive and diverse by actively recruiting members of underrepresented and minority communities. Hidden Wonders's recruitment efforts will maintain the number of qualified diverse applicants by:

- Employee (peer-to-peer for employment) referral program from diverse groups providing monetary benefit determined by the Company for successful referral;
  - *Program is capped at $500 per referral but final amount to be determined by Licensee.*
  - *This program will be ongoing until Licensee determines its goals have been satisfied or terminated as unsuccessful.*
  - *Program will pay Employees for every successful referral upon hired employee successfully completing orientation and maintaining employment for 6 months.*
- Participating in 2 career fairs annually as necessary to fulfill diversity goals;
- Advertising employment opportunities bi-monthly in a range of publications, such as bilingual media,
- Posting open jobs on online public boards;
- Updating recruiters and employment agencies that work with diverse candidates;
- Using social media and online platforms such as Zip Recruiter to reach online career and job websites; and
- Annually reach out to Plymouth's Veterans Agent to identify interested veterans seeking employment in the cannabis industry.
- Work with established recruiters who specialize in or are familiar with qualified candidates who are women, minorities, people with disabilities and/or LGBTQ+ people.

Employee Retention, Training and Development

Hidden Wonders will maintain a diverse and inclusive workforce by mentoring, training, and creating robust professional development programs that recruit, encourage, and promote a diverse workplace.

HW expects to train its talent on a rolling basis, so that there will always be staff training for management positions. This will enable the business to be prepared for the inevitable employee turnover that affects every business, regardless of industry. Hidden Wonders will also provide management training for employees seeking advancement through education credits or benefits.

Awareness of Diversity Plan goals and Hidden Wonders's efforts to create a workplace culture with zero tolerance for harassment, or retaliation is crucial to Hidden Wonders's success.

Hidden Wonders's diversity awareness training will emphasize its zero-tolerance commitment of harassment along with HW's strict adherence to take corrective action should any issues, concerns, or complaints arise. All Hidden Wonders employees will be required to complete the diversity awareness training program during their new employee orientation.

HW's new hires will complete a general orientation program and be able to describe, discuss, and respect the tenets outlined in the Diversity Plan. HW will also require all Hidden Wonders employees and management to complete ongoing diversity training on an annual basis. This will enable all levels of HW management and staff to stay up-to-date on best practices and policies and foster a deep understanding and compliance with HW's Diversity Plan.

Hidden Wonders will share information to the company and vendors related to its Diversity Plan by:

- Implementing mandatory diversity training programs for all HW employees;

- Communicating HW’s zero-tolerance policies for harassment, and bullying;
- Holding bi-monthly managerial meetings during HW’s first year to evaluate the Diversity Plan; over time move to quarterly with successful adoption and adherence to program;
- Employing an effective communications strategy to employees consisting of electronic and print media to support diversity initiatives.

HW will ensure that all employees have access to opportunities for promotion by communicating opportunities, training programs, and clearly defined job descriptions.

#2. HW will utilize the Massachusetts Supplier Diversity Office and other available resources, including the CCC’s public documents to find and prioritize the engagement of qualified wholesale suppliers, vendors, and other contractors that are majority owned and controlled by diverse individuals.

<u>Measurements</u>

HW will documents the number of diverse employees hired per demographic.

HW will document its advertisement.

HW will document the number of diverse suppliers, vendors and contractors contracted for services or products and the number of diverse companies that are engaged to determine if the percentage of goals for contracts is achieved.