Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR285338

Original Issued Date: 06/24/2026

Issued Date: 06/24/2026

Expiration Date: 06/24/2027

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Sunfusions, Inc.

Phone Number: 413-341-0908 **Email Address:** davidfromm@hotmail.com

Business Address 1: 6 Molasses Hill Rd **Business Address 2:**

Business City: Brookfield **Business State:** MA **Business Zip Code:** 01506

Mailing Address 1: P.O. Box 76 **Mailing Address 2:**

Mailing City: Brookfield **Mailing State:** MA **Mailing Zip Code:** 01506

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: David **Last Name:** Fromm **Suffix:**

Gender: Male **User Defined Gender:**

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

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

Entity with Direct or Indirect Authority 1

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

Entity Legal Name: MILLENT Holding Trust **Entity DBA:** **DBA City:**

Entity Description: Revocable trust

Foreign Subsidiary Narrative:

Entity Phone: 413-341-0908 **Entity Email:** davidfromm@hotmail.com **Entity Website:**

Entity Address 1: 6 Molasses Hill Rd **Entity Address 2:**

Entity City: Brookfield **Entity State:** MA **Entity Zip Code:** 01506

Entity Mailing Address 1: P.O. Box 76 **Entity Mailing Address 2:**

Entity Mailing City: Brookfield **Entity Mailing State:** MA **Entity Mailing Zip Code:** 01506

Relationship Description: The entity is a revocable trust that holds 100% of the shares of Sunfusions, Inc. David Fromm is the sole beneficiary and is also the trustee.

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: David **Last Name:** Fromm **Suffix:**

Marijuana Establishment Name: Sunfusions, Inc. **Business Type:** Marijuana Product Manufacture

Marijuana Establishment City: Brookfield **Marijuana Establishment State:** MA

Individual 2

First Name: David **Last Name:** Fromm **Suffix:**

Marijuana Establishment Name: Sunfusions, Inc. **Business Type:** Marijuana Cultivator

Marijuana Establishment City: Brookfield **Marijuana Establishment State:** MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 53 South Maple Street

Establishment Address 2:

Establishment City: Brookfield **Establishment Zip Code:** 01506

Approximate square footage of the establishment: 1500 **How many abutters does this property have?:** 10

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

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Community Outreach Meeting Documentation	COM Documentation_Sunfusions.pdf	pdf	672153b424916600084b92eb	10/29/2024
Plan to Remain Compliant with Local Zoning	Plan to Remain Compliant.pdf	pdf	6721540024916600084b9322	10/29/2024
Community Outreach Meeting Documentation	Sunfusions abutter list.pdf	pdf	6745009ae8b7890008660c43	11/25/2024
Executed HCA	sunfusionsretailhca_241126.pdf	pdf	67475614b92cff00089513bc	11/27/2024

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	Positive Impact Plan.pdf	pdf	6721549e24916600084b948b	10/29/2024

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

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

First Name: David **Last Name:** Fromm **Suffix:**

RMD Association: Not associated with an RMD

Background Question: yes

ENTITY BACKGROUND CHECK INFORMATION

Entity Background Check Information 1

Role: Other (specify) **Other Role:** Holds shares in trust

Entity Legal Name: MILLENT Holding Trust **Entity DBA:**

Entity Description: Revocable trust

Phone: 413-341-0908 **Email:** davidfromm@gmail.com

Primary Business Address 1: 6 Molasses Hill Rd **Primary Business Address 2:**

Primary Business City: Brookfield **Primary Business State:** MA **Principal Business Zip Code:** 01506

Additional Information: This entity is a revocable trust holding 100% of the shares of Sunfusions, Inc. The trustee and the sole beneficiary are David Fromm.

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	Sunfusions Articles.pdf	pdf	672158a9a18da60008e41660	10/29/2024
Bylaws	Sunfusions Bylaws.pdf	pdf	672158b1a18da60008e41674	10/29/2024
Department of Unemployment Assistance - Certificate of Good standing	Unemployment_Assistance_sunfusions.pdf	pdf	67215921a18da60008e4175b	10/29/2024
Secretary of Commonwealth - Certificate of Good Standing	Sunfusions COG_SOC.pdf	pdf	67450101e8b7890008660cd1	11/25/2024
Department of Revenue - Certificate of Good standing	sunfusions cogs_DOR.pdf	pdf	6745010be8b7890008660ce5	11/25/2024

No documents uploaded

Massachusetts Business Identification Number: 001694228

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	Business Plan.pdf	pdf	67215abb24916600084b9809	10/29/2024
Proposed Timeline	Proposed Timeline.pdf	pdf	67215b7a24916600084b9839	10/29/2024
Plan for Liability Insurance	Plan to obtain insurance.pdf	pdf	67215b9c24916600084b9853	10/29/2024
Capitalization Table	Sunfusions Cap Table.pdf	pdf	6734f4d324916600085a0298	11/13/2024

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for obtaining marijuana or marijuana products	Plan to Obtain Marijuana.pdf	pdf	67225be324916600084c5385	10/30/2024
Security plan	Security Plan.pdf	pdf	672275bea18da60008e5245b	10/30/2024
Prevention of diversion	Prevention of Diversion.pdf	pdf	67228038a18da60008e53881	10/30/2024
Storage of marijuana	Storage.pdf	pdf	672283ef24916600084cb031	10/30/2024
Transportation of marijuana	Transportation.pdf	pdf	672286cea18da60008e54cec	10/30/2024
Inventory procedures	Inventory.pdf	pdf	6722893b24916600084cbf20	10/30/2024
Quality control and testing	Quality Control.pdf	pdf	67228a6da18da60008e5527f	10/30/2024
Dispensing procedures	Dispensing.pdf	pdf	6723b3e124916600084d93f2	10/31/2024
Personnel policies including background checks	Personnel Policies.pdf	pdf	6723bedba18da60008e63f5b	10/31/2024
Record Keeping procedures	Recordkeeping.pdf	pdf	6723bf6ea18da60008e640ae	10/31/2024
Maintaining of financial records	Maintaining Financial Records.pdf	pdf	6723bf9da18da60008e6423e	10/31/2024

Diversity plan	Diversity Plan.pdf	pdf	6723bfc8a18da60008e643b3	10/31/2024
Qualifications and training	Qualifications and Training.pdf	pdf	6723c02ca18da60008e64698	10/31/2024
Energy Compliance Plan	Energy Compliance.pdf	pdf	6723c26e24916600084dbb85	10/31/2024
Restricting Access to age 21 and older	Restricting Access to Age 21.pdf	pdf	67450132e8b7890008660d4c	11/25/2024
Dispensing procedures	Unique Mark.pdf	pdf	6745016de8b7890008660d66	11/25/2024

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: 10:00 AM	**Monday To:** 7:00 PM
Tuesday From: 10:00 AM	**Tuesday To:** 7:00 PM
Wednesday From: 10:00 AM	**Wednesday To:** 7:00 PM
Thursday From: 10:00 AM	**Thursday To:** 7:00 PM
Friday From: 10:00 AM	**Friday To:** 8:00 PM
Saturday From: 10:00 AM	**Saturday To:** 8:00 PM

Sunday From: 10:00 AM **Sunday To:** 5:00 PM

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): 6/12/24

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).

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: 5/20/24

    b. Name of publication: Telegram & Gazette

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: 5/23/24

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: 5/23/24

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:

Sunfusions, Inc.

Name of applicant's authorized representative:

David Fromm

Signature of applicant's authorized representative:

ATTACHMENT A

LOCALiQ
NEW ENGLAND

PO Box 631210 Cincinnati, OH 45263-1210

AFFIDAVIT OF PUBLICATION

Cable Fleisher & Sosebee PLLC
80 Elm st
Hatfield MA 01038

STATE OF MASSACHUSETTS, COUNTY OF WORCESTER

The Telegram & Gazette, a newspaper distributed in the county of Worcester, published in the City of Worcester, County of Worcester, State of Massachusetts printed and published and personal knowledge of the facts herein state and that the notice hereto annexed was Published in said newspapers in the issues dated on:

05/20/2024

and that the fees charged are legal.
Sworn to and subscribed before on 05/20/2024

Legal Clerk

Notary, State of WI, County of Brown

8-7-26

My commission expires

Publication Cost:	$51.92	
Order No:	10182470	# of Copies:
Customer No:	1445801	0
PO #:	LNEO0102290	

THIS IS NOT AN INVOICE!

Please do not use this form for payment remittance.

NICOLE JACOBS
Notary Public
State of Wisconsin

Public Notice

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for 6/12/24 at 6:00pm at 6 Central St, Brookfield, MA 01506. The proposed cultivation and manufacturing marijuana establishment is anticipated to be located at 6 Molasses Hill Rd, Brookfield MA 01506, and the proposed retail marijuana establishment is anticipated to be located at 67 South Maple St, Brookfield MA 01506. There will be an opportunity for the public to ask questions.

May 20 2024

LNEO0102290

ATTACHMENT B

May 22, 2024

Town Clerk
Brookfield Town Hall
6 Central Street
Brookfield, MA 01506

RE: NOTICE OF COMMUNITY OUTREACH MEETING REGARDING PROPOSAL FOR A MARIJUANA ESTABLISHMENT

Dear Town of Brookfield Clerk:

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for 6/12/24 at 6:00pm at 6 Central St, Brookfield, MA 01506. The proposed cultivation and manufacturing marijuana establishment is anticipated to be located at 6 Molasses Hill Rd, Brookfield MA 01506, and the proposed retail marijuana establishment is anticipated to be located at 67 South Maple St, Brookfield MA 01506. There will be an opportunity for the public to ask questions.

Please feel free to contact us with any questions or concerns.

Sincerely,

Kyle Sosebee, Esq.
Cable Fleisher & Sosebee PLLC
(413) 341-0908
kyle@cfsattorneys.com

ATTACHMENT C

May 22, 2024

RE: NOTICE OF COMMUNITY OUTREACH MEETING REGARDING PROPOSAL FOR A MARIJUANA ESTABLISHMENT

Dear Neighbor,

We are writing to provide notice that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for 6/12/24 at 6:00pm at 6 Central St, Brookfield, MA 01506. The proposed cultivation and manufacturing marijuana establishment is anticipated to be located at 6 Molasses Hill Rd, Brookfield MA 01506, and the proposed retail marijuana establishment is anticipated to be located at 67 South Maple St, Brookfield MA 01506. There will be an opportunity for the public to ask questions.

Please feel free to contact us with any questions or concerns.

Sincerely,

Kyle Sosebee, Esq.
Cable Fleisher & Sosebee PLLC
(413) 341-0908
kyle@cfsattorneys.com

Plan to Remain Compliant with Zoning

Sunfusions will, at all times, remain compliant with the local zoning requirements as set forth in the Brookfield Zoning Bylaws and any other additional requirements imposed by local or state governments. Sunfusions's location is properly zoned for adult-use marijuana uses.

Sunfusions is more than 500 feet of any school or day-care center.

Sunfusions is required to apply for a Special Permit from the Planning Board of the Town of Brookfield. The special permit application criteria include findings that the establishment: is designed to minimize adverse impacts; has received a provisional license from the CCC; has a Host Community Agreement; has an adequate security plan; and has addressed issues of traffic and parking.

Additionally, Sunfusions will maintain positive and cooperative relationships with neighboring residents and businesses by providing contact information to our neighbors so that Sunfusions can immediately address any issues concerning parking, noise, odor or other potential concerns.

prop_id	site_addr	addr_num	full_str	city	zip	owner1	own_addr	own_city	own_state	own_zip
045/004.B-0000-0041.A	18 MOLASSES HILL RD	18	MOLASSES HILL RD	BROOKFIELD	01506	[redacted]	PO BOX 582	BROOKFIELD	MA	01506 0582
045/004.B-0000-0038.0	13 MOLASSES HILL RD	13	MOLASSES HILL RD	BROOKFIELD	01506	[redacted]	13 MOLASSES HILL RD	BROOKFIELD	MA	01506
045/004.C-0000-0018.0	29 RICE CORNER RD	29	RICE CORNER RD	BROOKFIELD	01506	[redacted]	35 RICE CORNER RD	BROOKFIELD	MA	01506
045/004.C-0000-0014.0	53 RICE CORNER RD	53	RICE CORNER RD	BROOKFIELD	01506	[redacted]	53 RICE CORNER RD	BROOKFIELD	MA	01506
045/004.C-0000-0014.B	49 RICE CORNER RD	49	RICE CORNER RD	BROOKFIELD	01506	[redacted]	51 RICE CORNER RD	BROOKFIELD	MA	01506
045/004.B-0000-0014.A	68 FISKDALE RD	68	FISKDALE RD	BROOKFIELD	01506	[redacted]	PO BOX 76	BROOKFIELD	MA	01506
045/004.C-0000-0019.0	0 RICE RESERVOIR	0	RICE RESERVOIR	BROOKFIELD	01506	[redacted]	251 CAUSEWAY ST, SUITE 900	BOSTON	MA	02114 2104
045/003.B-0000-0005.0	42 MOLASSES HILL RD	42	MOLASSES HILL RD	BROOKFIELD	01506	[redacted]	210 BENNETT RD PO BOX 236	HAMPDEN	MA	01036 0236
045/004.B-0000-0019.B	5 MOLASSES HILL RD	5	MOLASSES HILL RD	BROOKFIELD	01506	[redacted]	9 MOLASSES HILL RD	BROOKFIELD	MA	01506
045/004.B-0000-0015.0	20 MOLASSES HILL RD	20	MOLASSES HILL RD	BROOKFIELD	01506	[redacted]	657 WORCESTER ST APT 805	SOUTHBRIDGE	MA	01550
045/004.B-0000-0013.0	64 FISKDALE RD	64	FISKDALE RD	BROOKFIELD	01506	[redacted]	64 FISKDALE RD	BROOKFIELD	MA	01506
045/003.B-0000-0065.0	3 SUGAR MAPLE TERR	3	SUGAR MAPLE TERR	BROOKFIELD	01506	[redacted]	18 MABELLE ST	WORCESTER	MA	01602 2049
045/003.C-0000-0006.A	55 RICE CORNER RD	55	RICE CORNER RD	BROOKFIELD	01506	[redacted]	57 RICE CORNER RD	BROOKFIELD	MA	01506
045/003.C-0000-0006.0	57 RICE CORNER RD	57	RICE CORNER RD	BROOKFIELD	01506	[redacted]	57 RICE CORNER RD	BROOKFIELD	MA	01506
045/004.B-0000-0010.0	61 FISKDALE RD	61	FISKDALE RD	BROOKFIELD	01506	[redacted]	61 FISKDALE RD	BROOKFIELD	MA	01506
045/004.C-0000-0016.0	43 RICE CORNER RD	43	RICE CORNER RD	BROOKFIELD	01506	[redacted]	43 RICE CORNER RD	BROOKFIELD	MA	01506
045/004.B-0000-0021.0	16 MOLASSES HILL RD	16	MOLASSES HILL RD	BROOKFIELD	01506	[redacted]	PO BOX 404	BROOKFIELD	MA	01506 0404
045/004.B-0000-0019.A	75 FISKDALE RD	75	FISKDALE RD	BROOKFIELD	01506	[redacted]	PO BOX 714	BROOKFIELD	MA	01506 0714
045/003.C-0000-0016.A	67 RICE CORNER RD	67	RICE CORNER RD	BROOKFIELD	01506	[redacted]	251 CAUSEWAY ST SUITE 400	BOSTON	MA	02114
045/004.B-0000-0037.0	11 MOLASSES HILL RD	11	MOLASSES HILL RD	BROOKFIELD	01506	[redacted]	11 MOLASSES HILL RD	BROOKFIELD	MA	01506
045/004.B-0000-0036.0	9 MOLASSES HILL RD	9	MOLASSES HILL RD	BROOKFIELD	01506	[redacted]	9 MOLASSES HILL RD	BROOKFIELD	MA	01506
045/004.B-0000-0009.0	8 MITCHELL HILL RD	8	MITCHELL HILL RD	BROOKFIELD	01506	[redacted]	8 MITCHELL HILL RD	BROOKFIELD	MA	01506
045/004.B-0000-0042.0	22 MOLASSES HILL RD	22	MOLASSES HILL RD	BROOKFIELD	01506	[redacted]	PO BOX 404	BROOKFIELD	MA	01506 0404
045/006.C-0000-0005.0	47 SOUTH MAPLE ST	47	SOUTH MAPLE ST	BROOKFIELD	01506	[redacted]	PO BOX 158	EAST BROOKFIELD	MA	01515 0158
045/006.C-0000-0045.0	5 QUABOAG ST	5	QUABOAG ST	BROOKFIELD	01506	[redacted]	5 QUABOAG ST	BROOKFIELD	MA	01506
045/006.C-0000-0003.B	4 QUABOAG ST	4	QUABOAG ST	BROOKFIELD	01506	[redacted]	6 QUABOAG ST	BROOKFIELD	MA	01506
045/006.C-0000-0055.0	50 SOUTH MAPLE ST	50	SOUTH MAPLE ST	BROOKFIELD	01506	[redacted]	PO BOX 536	BROOKFIELD	MA	01506
045/006.C-0000-0030.0	57 SOUTH MAPLE ST	57	SOUTH MAPLE ST	BROOKFIELD	01506	[redacted]	121 WEST MAIN ST	WEST BROOKFIELD	MA	01585
045/006.C-0000-0026.0	54 SOUTH MAPLE ST	54	SOUTH MAPLE ST	BROOKFIELD	01506	[redacted]	PO BOX 536	BROOKFIELD	MA	01506
045/006.C-0000-0003.A	6 QUABOAG ST	6	QUABOAG ST	BROOKFIELD	01506	[redacted]	6 QUABOAG ST	BROOKFIELD	MA	01506
045/006.C-0000-0047.0	60 SOUTH MAPLE ST	60	SOUTH MAPLE ST	BROOKFIELD	01506	[redacted]	60 SOUTH MAPLE ST	BROOKFIELD	MA	01506

Positive Impact Plan

Sunfusions has developed a plan to positively impact the community, particularly areas of disproportionate impact (ADI) and disproportionately harmed individuals. Sunfusions recognizes that the war on drugs has harmed these communities and individuals in numerous and complex ways. Therefore, the company supports the following Plan to promote and encourage full participation in the regulated cannabis industry by people from communities that have previously been disproportionately harmed by marijuana prohibitions and enforcement and to positively impact those communities.

Sunfusions is located in Brookfield, MA. The nearest Areas of Disproportionate Impact are Spencer, Southbridge and Monson (collectively, the Target Areas).

Goals

1. Reduce barriers to entry in the commercial adult-use cannabis industry for disproportionately harmed people through hiring.
2. Provide business capital for disproportionately harmed people by donating to the Cannabis Social Equity Trust Fund.

Programs

Hiring Program:

Sunfusions will hire, in a legal and non-discriminatory manner, at least 20% of its employees from Target Areas, and/or Massachusetts residents who have past drug convictions, who have parents or spouses with past drug convictions, or individuals who are certified Economic Empowerment Recipients or Social Equity Program Participants. Jobs will be posted when available, but not less than once per year, utilizing online platforms like LinkedIn and local newspapers focused on the Target Areas.

Donation Program:

Sunfusions will donate at least $1,500 annually to the Cannabis Social Equity Trust Fund (CSE Trust Fund). The CSE Trust Fund was established by MGL Chapter 94G § 14A to encourage the full participation in the state's regulated marijuana industry of entrepreneurs from communities that have been disproportionately harmed by marijuana prohibition and enforcement. Sunfusions hopes to increase it's annual donation amount based on future revenue.

Metrics

Sunfusions will execute the above plan and, at least one time per year, measure the outcomes in the following way:

1. Document in a report the number and percentage of new hires of Disproportionately Harmed People, and a description of job postings and other efforts made to recruit new hires.

2. Document in a report the amount of money donated to the CSE Trust Fund.

Sunfusions will use these metrics to assess its plan and to demonstrate success of the plan upon application for license renewal by submitting documentation of the metrics to the CCC.

Acknowledgments

Sunfusions will adhere to the requirements set forth in 935 CRM 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment.

Any actions taken, or programs instituted, by Sunfusions will not violate the CCC's regulations with respect to limitations on ownership or control or other applicable state laws.

The Commonwealth of Massachusetts, William Francis Galvin

Corporations Division

One Ashburton Place - Floor 17, Boston MA 02108-1512 | Phone: 617-727-9640

Articles of Organization

(General Laws, Chapter 156D, Section 2.02; 950 CMR 113.16)

Minimum Filing Fee: $250.00

Identification Number: 001694228 (number will be assigned)

ARTICLE I

The exact name of the corporation is:

SUNFUSIONS, INC.

ARTICLE II

Unless the articles of organization otherwise provide, all corporations formed pursuant to G.L. C156D have the purpose of engaging in any lawful business. Specify if you want a more limited purpose:

ARTICLE III

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

Class of Stock	Par value per share (Enter 0 if no Par)	Total authorized number of shares	Total authorized par value	Total issued and outstanding number of shares
CNP	0	1,000	0	

ARTICLE IV

If more than one class of stock is authorized, state a distinguishing designation for each class. Prior to the issuance of any shares of a class, if shares of another class are outstanding, the corporation must provide a description of the preferences, voting powers, qualifications, and special or relative rights or privileges of that class and of each other class of which shares are outstanding and of each series then established within any class.

ARTICLE V

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

ARTICLE VI

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

ARTICLE VII

The effective date of organization shall be the date and time the articles were received for filing if the articles are not rejected within the time prescribed by law. If a later effective date is desired, specify such date, which may not be later than ninety (90) days from the date and time of filing

Later Effective Date (mm/dd/yyyy): 08/31/2023 Time (HH:MM)

ARTICLE VIII

The information contained in Article VIII is not a permanent part of the articles of organization.

a,b. The street address of the initial registered office of the corporation in the commonwealth and the name of the initial registered agent at the registered office:

Agent name: RONALD W. DUNBAR, JR.

Number and street: 10 POST OFFICE SQUARE

Address 2: SUITE 800

City or town: BOSTON State: MA Zip code: 02109

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

Title	Individual Name	Address
PRESIDENT	DAVID FROMM	62 L STREET HULL, MA 02045 USA
TREASURER	DAVID FROMM	62 L STREET HULL, MA 02045 USA
SECRETARY	DAVID FROMM	62 L STREET HULL, MA 02045 USA
DIRECTOR	DAVID FROMM	62 L STREET HULL, MA 02045 USA

d. The fiscal year end (i.e., tax year) of the corporation:

January 31

e. A brief description of the type of business in which the corporation intends to engage:

APPLYING FOR A LICENSE WITH THE CANNABIS CONTROL COMMISSION.

f. The street address (post office boxes are not acceptable) of the principal office of the corporation:

Number and street: 6 MOLASSES HILL ROAD

Address 2:

City or town: BROOKFIELD State: MA Zip code: 01506

Country: UNITED STATES

g. Street address where the records of the corporation required to be kept in the Commonwealth are located (post office boxes are not acceptable):

Number and street: 6 MOLASSES HILL ROAD

Address 2:

City or town: BROOKFIELD State: MA Zip code: 01506

Country: UNITED STATES

Which is:

- [x] its principal office
- [ ] an office of its transfer agent
- [ ] an office of its secretary/assistant secretary
- [ ] its registered office

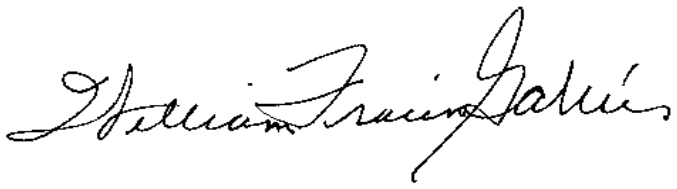
Signed this 31 Day of August, 2023 at 14:08 PM by the incorporator(s). (If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.)

RONALD W. DUNBAR, JR.

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:

August 31, 2023 02:05 PM



WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

BYLAWS
OF
SUNFUSIONS, INC.

SECTION 1

Articles of Organization

The name of the corporation shall be as set forth in the articles of organization. These bylaws, the powers of the corporation and of its directors and shareholders, and all matters concerning the conduct and regulation of the business of the corporation shall be subject to the articles of organization. All references in these bylaws to the articles of organization shall mean the articles of organization of the corporation, as from time to time in effect. All references in these bylaws to the Massachusetts Business Corporation Act shall mean Massachusetts General Laws Chapter 156D, as from time to time in effect.

SECTION 2

Shareholders

2.1 *Annual Meeting*

The annual meeting of the shareholders shall be held on a date determined by the board of directors. Except as otherwise may be provided in the articles of organization, purposes for which an annual meeting is to be held, in addition to the election of directors, may be specified by the board of directors or by the President and stated in the notice of the meeting.

2.2 *Special Meetings*

Special meetings of the shareholders may be called by the President, the board of directors, or the holders of at least 10 percent of the votes entitled to be cast on any issue to be considered at the proposed special meeting. Such call shall state the date, time, place, and purposes of the meeting. Only business within the purposes described in the Corporation's meeting notice may be conducted at a special meeting of the shareholders.

2.3 *Place of Meetings; Remote Participation*

All meetings of the shareholders shall be at the principal office of the corporation or at such other place as the board of directors, the President, or the person or persons calling the meeting may determine. If authorized by the directors, any meeting of shareholders need not be held at any place but instead may be held solely by remote communication. Shareholders and proxyholders not physically present at a meeting of shareholders may participate in a meeting of shareholders, be deemed present in person, and vote at a meeting of shareholders, by means of remote communication, subject to such guidelines and procedures as the board of directors may adopt. Such guidelines and procedures shall include reasonable measures (1) to verify that each person deemed present and permitted to vote at the meeting by means of remote communication is a shareholder or proxyholder, and (2) to provide such shareholders and proxyholders a reasonable opportunity to participate in the meeting and to vote on matters submitted to the shareholders, including an opportunity to read or hear the proceedings of the meeting substantially concurrently with such proceedings. If any shareholder or proxyholder votes or takes other action at the meeting by means of remote communication, the corporation shall maintain a record of such vote or other action.

2.4 *Notice of Shareholder Meetings*

A written notice of each meeting of shareholders, stating the place, day, and hour of such meeting and the purposes for which the meeting is called, shall be given by the Secretary, Assistant Secretary, President, or such person designated by the board of directors, at least seven and no more than 60 days before the meeting, to each shareholder entitled to such notice. A shareholder may waive any notice required by the Massachusetts Business

Corporation Act, the articles of organization, or the bylaws, before or after the date and time stated in the notice. The waiver shall be in writing, signed by the shareholder entitled to the notice, and delivered to the corporation for inclusion with the records of the meeting. A shareholder's attendance at a meeting waives objection to lack of notice or defective notice of the meeting, unless the shareholder at the beginning of the meeting objects to holding the meeting or transacting business at the meeting. A shareholder's attendance at a meeting waives objection to consideration of a particular matter at the meeting that is not within the purpose or purposes described in the meeting notice, unless the shareholder objects to considering the matter when it is presented.

2.5 *Action at Meeting*

Unless otherwise provided by the Massachusetts Business Corporation Act, the articles of organization, or these bylaws, at any meeting of the shareholders, a majority of the votes entitled to be cast upon a matter by a voting group at the meeting shall constitute a quorum of that voting group for action on that matter, but a lesser interest may adjourn any meeting from time to time, and the meeting may be held as adjourned without further notice. A share once represented for any purpose at a meeting is deemed present for quorum purposes for the remainder of the meeting and for any adjournment of that meeting unless: (1) the shareholder attends solely to object to lack of notice, defective notice, or the conduct of the meeting on other grounds, and does not vote the shares or otherwise consent that they are to be deemed present; or (2) in the case of an adjournment, a new record date is or shall be set for that adjourned meeting. Unless otherwise required by Massachusetts Business Corporation Act, the articles of organization, or these bylaws, if a quorum of a voting group exists, (1) favorable action on a matter, other than the election of directors, is taken by a voting group if the votes cast within the group favoring the action exceed the votes cast opposing the action, and (2) directors shall be elected by a plurality of the votes cast by the shares entitled to vote in the election at the meeting.

2.6 *Voting and Proxies*

Unless otherwise provided in the articles of organization, each share shall have one vote on any matter to be considered at the meeting. Shareholders may vote either in person or by proxy, which shall be filed with the Secretary or Temporary Secretary at the meeting, or any adjournment of the meeting, before being voted. Unless otherwise provided in the appointment form, a proxy is valid for 11 months from the date the shareholder signed the form or, if it is undated, from the date of its receipt by the officer or agent of the corporation. Such proxy shall entitle the holder thereof to vote at any adjournment of such meeting but shall not be valid after the final adjournment of such meeting.

2.7 *Action by Consent; Electronic Transmission*

a. Any action required or permitted to be taken at a shareholders' meeting may be taken without a meeting if the action is taken either by all shareholders entitled to vote on the action, or to the extent permitted by the articles of organization, by shareholders having not less than the minimum number of votes necessary to take the action at a meeting at which all shareholders entitled to vote on the action are present and voting. The action shall be evidenced by one or more written consents that describe the action taken, are signed by shareholders having the requisite votes, bear the dates of the signatures of such shareholders, and are delivered to the corporation for inclusion with the records of meetings within 60 days of the earliest dated consent delivered to the corporation. Such consents shall be treated as a vote of shareholders for all purposes. If the shareholders take action by written consent, the corporation shall give such notice of the action to shareholders who have not signed such consent as is required by the Massachusetts Business Corporation Act.

b. Any vote, consent, waiver, proxy appointment, or other action by a shareholder or by the proxy or other agent of any shareholder shall be considered given in writing, dated, and signed if it consists of an electronic transmission that sets forth or is delivered with information from which the corporation can determine (1) that the electronic transmission was transmitted by the shareholder, proxy, or agent or by a person authorized to act for the shareholder, proxy, or agent; and (2) the date on which such shareholder, proxy, agent, or authorized person transmitted the electronic transmission. The date on which the electronic transmission is transmitted shall be considered the date on which it was signed. The electronic transmission shall be considered received by the corporation if it has been sent to any address specified by the corporation for that

purpose or, if no address has been specified, to the principal office of the corporation, addressed to the Secretary or other officer or agent having custody of the records of proceedings of shareholders.

SECTION 3

Directors

3.1 *Number and Election*

The corporation shall have a board of directors consisting of one or more individuals. The board of directors shall be elected by such shareholders as have the right to vote at the annual meeting of the shareholders or at a special meeting held in place thereof. No ballot shall be required for such election unless requested by a shareholder present or represented at the meeting and entitled to vote in the election. Subject to any minimum number of directors required by the Massachusetts Business Corporation Act, the number of directors shall be fixed by vote at the meeting at which they are elected, but the shareholders, at any special meeting held for the purpose, or a majority of the directors then in office, may increase the number of directors as thus fixed and elect new directors to complete the number so fixed, and the shareholders, at any such special meeting, may decrease the number of directors as thus fixed and remove directors to reduce the number of directors to the number so fixed. Subject to the articles of organization and these bylaws, each director shall hold office until the next annual meeting and until his or her successor is elected and qualified.

3.2 *Resignation, Removal, and Vacancy*

A director may resign at any time by delivering written notice of resignation to the board of directors, its chairman, or the corporation. Except as otherwise provided by the Massachusetts Business Corporation Act, the articles of organization, or these bylaws: (1) the shareholders may remove one or more directors with or without cause, (2) the directors may remove a director for cause by vote of a majority of the directors then in office, and (3) the shareholders or board of directors may fill any vacancy, or if the directors remaining in office constitute fewer than a quorum of the board, they may fill the vacancy by the affirmative vote of a majority of all the directors remaining in office.

3.3 *Powers of Directors*

Subject to law and the articles of organization, all corporate power shall be exercised by or under the authority of, and the business and affairs of the corporation shall be managed under the direction of, its board of directors.

3.4 *Regular Meetings*

Regular meetings of the board of directors may be held without call or formal notice at such places and at such times as the board may by vote from time to time determine. A regular meeting of the board of directors may be held without call or formal notice immediately after and at the same place as the annual meeting of the shareholders, or the special meeting of the shareholders held in place of such annual meeting.

3.5 *Special Meetings*

Special meetings of the board of directors may be held at any time and at any place when called by the President, Treasurer, or two or more directors, or the sole director if there is only one director. Notice of such meeting shall be given to each director by the Secretary or, if there is no Secretary, or in case of the death, absence, incapacity, or refusal of the Secretary, by the officer or directors calling the meeting. Such notice (1) must be given at least two days prior to the date of the special meeting, and (2) need not describe the purpose of the meeting unless otherwise required by the articles of organization or these bylaws.

3.6 *Waiver of Notice*

A director may waive notice of any directors' meeting before or after the date of the meeting. The waiver shall be in writing, signed by the director entitled to the notice, or in the form of an electronic transmission by the

director to the corporation, and filed with the minutes or corporate records. A director's attendance at or participation in a meeting waives any required notice to such director of the meeting unless the director, at the beginning of the meeting or promptly upon his or her arrival, objects to holding the meeting or transacting business at the meeting and does not thereafter vote for or assent to action taken at the meeting.

3.7 *Quorum and Voting*

A majority of the directors then in office shall constitute a quorum for the transaction of business, but a lesser number may adjourn any meeting from time to time, and the meeting may be held as adjourned without further notice. If a quorum is present when a vote is taken, the affirmative vote of a majority of the directors present is the act of the board of directors, unless the vote of a greater number of directors is required by the articles of organization or these bylaws.

3.8 *Action by Consent*

Any action by the board of directors may be taken without a meeting by unanimous consent by the directors and filed with the records of the directors' meetings. The action must be evidenced by one or more consents describing the action taken, in writing, signed by each director, or delivered to the corporation by electronic transmission, to the address specified by the corporation for the purpose or, if no address has been specified, to the principal office of the corporation, addressed to the Secretary or other officer having custody of the records of proceedings of directors. Such consent shall be treated as a vote of the board of directors for all purposes.

3.9 *Remote Participation*

Members of the board of directors or any committee designated by the board of directors may participate in a meeting of the board or such committee, or conduct any such meeting, through the use of any means of communication by which all directors participating may simultaneously hear each other during the meeting and participation by such means shall constitute presence in person at the meeting.

3.10 *Committees*

Except as otherwise provided in the articles of organization the board of directors may, by vote of a majority of the directors, appoint from its own number a committee or committees, consisting of one or more members who shall serve at the pleasure of the board of directors and which may exercise such authority of the board of directors as is delegated by the board, except for those powers which, pursuant to the Massachusetts Business Corporation Act, may not be delegated to any such committee. Subject to the Massachusetts Business Corporation Act, the provisions of such Act, and these bylaws governing meetings, action without meetings, notice and waiver of notice, and quorum and voting requirements of the board of directors shall apply to committees and their members.

SECTION 4

Officers

4.1 *Identity, Election, and Appointment of Officers*

The officers of the corporation shall consist of a President, Treasurer, and Secretary, who shall be elected by the board of directors, and such other officers as the board of directors may appoint.

4.2 *Duties and Powers; Qualification and Tenure*

Subject to these bylaws, each officer shall have, in addition to the duties and powers specifically set forth in these bylaws, such duties and powers as are customarily incident to his or her office and such duties and powers as the board of directors may from time to time designate. Any officer may, but need not, be a shareholder or director. Any two or more offices may be held by the same person. Any officer may be required by the board of directors to give bond for the faithful performance of his or her duties to the corporation in such amount and with such sureties as the board of directors may determine. Except as otherwise provided by law, the articles of

organization, these bylaws, or the directors' resolution electing or appointing such officer, the President, Treasurer, and Secretary shall hold office until the first meeting of the board of directors following the annual meeting of shareholders and thereafter until his or her successor is elected and qualified, and all other officers shall hold office until the respective successor of each is elected and qualified.

4.3 *President*

The President shall be the chief executive officer of the corporation and shall, subject to the direction of the board of directors, have general supervision and control of its business. Unless otherwise provided by the board of directors, the President shall preside, if present, at all meetings of shareholders and of the board of directors.

4.4 *Treasurer*

The Treasurer, subject to the direction and under the supervision of the board of directors, shall have general charge of the financial concerns of the corporation and the care and custody of the funds and valuable papers of the corporation, except his or her own bond. The Treasurer shall keep, or cause to be kept, accurate books of account, which shall be the property of the corporation.

4.5 *Secretary*

The Secretary shall keep a record of the meetings of shareholders, the board of directors, and any executive and other committees. In the absence of the Secretary from any such meetings, an Assistant Secretary, if one has been elected, otherwise a Temporary Secretary, designated by the person presiding at the meeting, shall perform the duties of the Secretary.

4.6 *Removal and Vacancies*

The board of directors may remove any officer at any time with or without cause, and may fill any vacancy in any office.

SECTION 5

Capital Shares

5.1 *Share Certificates*

Each shareholder shall be entitled to a share certificate in such form as is prescribed by law and approved from time to time by the board of directors. The certificates shall be signed by the President or any Vice President and by the Treasurer or any Assistant Treasurer. Such signatures may be facsimiles. If any officer who has signed or whose facsimile signature has been placed on such certificate no longer holds office when the certificate is issued, the certificate nevertheless shall be valid. Notwithstanding the above, the Corporation may issue uncertificated shares accompanies by information statements which note conspicuously all transfer restrictions applicable to the shares and contain a summary of all rights of each class or series of shares or a statement that the Corporation will furnish this information upon request.

5.2 *Transfer of Shares*

Subject to restrictions, if any, imposed by the articles of organization, title to a share certificate and to the shares represented thereby shall be transferred only by delivery of the certificate properly endorsed, or by delivery of the certificate accompanied by a written assignment of shares represented by such certificate, or a written power of attorney to sell, assign, or transfer the certificate or the shares represented thereby, properly executed. The person registered in the records of the corporation as the owner of shares shall have the exclusive right to receive dividends thereon and to vote thereon as such owner, shall be held liable for such calls and assessments, if any, as may lawfully be made thereon, and, except only as may be required by law, may in all respects be treated by the corporation as the exclusive owner thereof unless and to the extent that the corporation has established a

procedure by which the beneficial owner of shares that are registered in the name of a nominee will be recognized by the corporation as the shareholder.

5.3 *Transfer Records*

Unless a transfer agent is appointed, the Secretary shall keep or cause to be kept, at the principal office of the corporation or at the office of the Secretary, the share and transfer records of the corporation, in which are contained the names of all shareholders and the record address and the amount of shares held by each. The transfer records of the shares of the corporation may be closed for such period from time to time in anticipation of shareholders' meetings or the declaration or payment of dividends as the board of directors may determine.

5.4 *Lost or Destroyed Certificates*

In case of the alleged loss, destruction, or mutilation of a share certificate, a new share certificate may be issued in place of the lost, destroyed, or mutilated certificate upon such terms as the board of directors may determine.

SECTION 6

Fiscal Year

Except as from time to time otherwise determined by the board of directors, the fiscal year of the corporation shall end on December 31.

SECTION 7

Indemnification

The corporation shall indemnify and hold harmless each present or former director or officer of the corporation to the fullest extent permitted by law, subject to such determination as the law may require that indemnification is permissible, for any threatened, pending, or completed action, suit, or proceeding, whether civil, criminal, administrative, arbitrative, or investigative, and whether formal or informal ("Proceeding"), against such director or officer in his or her capacity as such or in his or her capacity as a director, officer, partner, trustee, manager, employee, or agent of another domestic or foreign corporation, partnership, joint venture, trust, limited liability company, employee benefit plan, or other entity, if the corporation requested him or her to so serve. A director or officer is considered to be serving an employee benefit plan at the corporation's request if his or her duties to the corporation also impose duties on, or otherwise involve services by, him or her to the plan or to participants in or beneficiaries of the plan. The corporation may, before final disposition of any Proceeding, advance funds to pay for or reimburse the reasonable expenses incurred by a director or officer who is a party to a Proceeding to the extent permitted by law. Nothing in this Section shall affect any rights to indemnification to which any person may be entitled by contract or otherwise under law. No amendment or repeal of any provision of this Section shall adversely affect the right of a person to indemnification under this Section with respect to his or her acts or omissions that occurred at any time prior to such amendment or repeal.

SECTION 8

Other Provisions

8.1 *Notices*

Notices to or from any shareholder, director, officer, or the corporation may be given in any manner permitted under the Massachusetts Business Corporation Act.

8.2 *Voting of Securities*

Except as the board of directors may otherwise designate, the President may waive notice of, or vote for this corporation or appoint any person or persons to act as proxy or attorney in fact for this corporation with or

without power of substitution at, any meeting of shareholders of any other corporation or organization, the securities of which may be held by this corporation.

SECTION 9

Amendments

These bylaws may be amended or repealed by the shareholders. If authorized by the articles of organization, the board of directors may also make, amend, or repeal the bylaws in whole or in part, except with respect to this Section and any provision of these bylaws which, by an express provision in the Massachusetts Business Corporation Act, the articles of organization, or these bylaws, requires action by the shareholders. Not later than the time of giving notice of the meeting of shareholders next following the making, amending, or repealing by the board of directors of any bylaw, notice stating the substance of the action taken by the board of directors shall be given to all shareholders entitled to vote on amending the bylaws. Any action taken by the board of directors with respect to the bylaws may be amended or repealed by the shareholders.

The Commonwealth of Massachusetts

Secretary of the Commonwealth

State House, Boston, Massachusetts 02133

William Francis Galvin
Secretary of the
Commonwealth

Date: November 22, 2024

To Whom It May Concern :

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

SUNFUSIONS, INC.

is a domestic corporation organized on **August 31, 2023** , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.

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

William Francis Galvin

Secretary of the Commonwealth

Certificate Number: 24110448880

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

Processed by: Kma

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

mass.gov/dor

Letter ID: L0103744928
Notice Date: November 21, 2024
Case ID: 0-002-676-720

CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE

000022

SUNFUSIONS INC
6 MOLASSES HILL RD OFC
BROOKFIELD MA 01506-1702

Why did I receive this notice?

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

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

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

What if I have questions?

If you have questions, call us at (617) 887-6400, Monday through Friday, 9:00 a.m. to 4:00 p.m.

Visit us online!

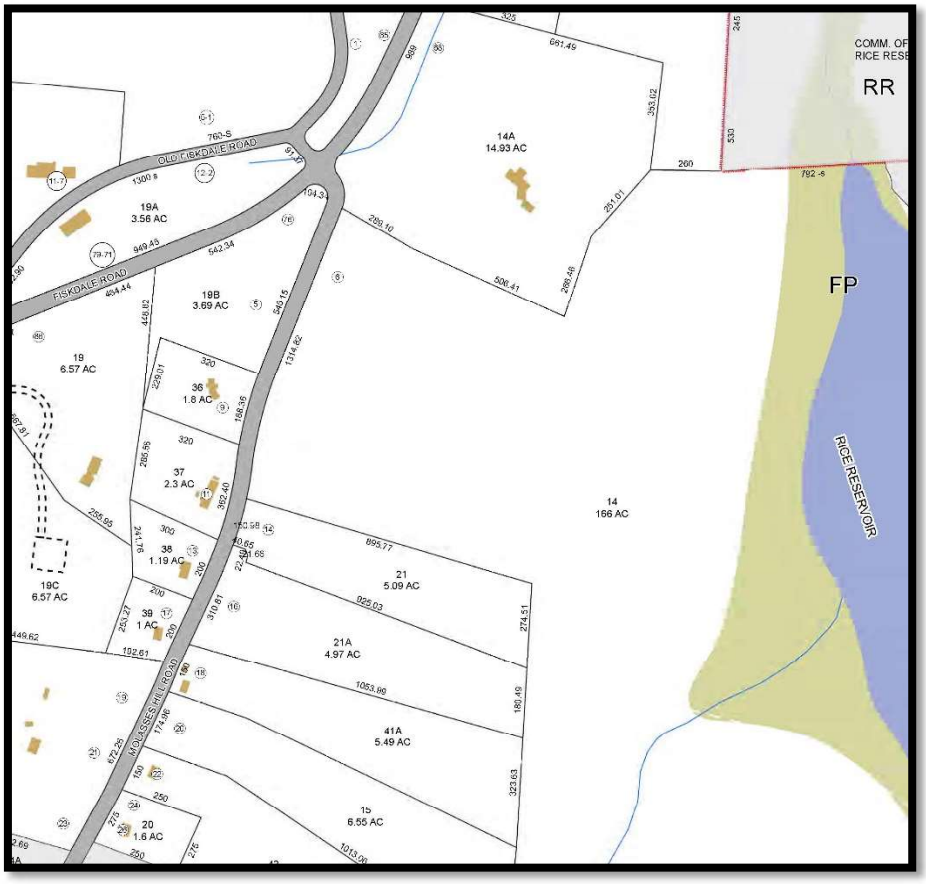
Visit mass.gov/dor to learn more about Massachusetts tax laws and DOR policies and procedures, including your Taxpayer Bill of Rights, and MassTaxConnect for easy access to your account:

- 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

Sunfusions
Cannabis

Business Plan for the Town of Brookfield, MA



Executive Summary for Sunfusions Cannabis.

Mission

Our mission is to operate a vertically integrated adult-use cannabis cultivation, manufacturing and retail business that offers the highest quality cannabis while serving as a model to regulatory authorities and a trusted employer within Brookfield, MA.

Goals

✓ Develop a recognizable and trusted brand known for fair employment practices and consistently superb product quality

✓ Serve as a model to regulatory authorities.

✓ Stimulate the local economy by employing resident staff and vendors.

The Company

Sunfusions seeks to obtain adult-use cannabis cultivation, manufacturing and retail licenses from the Cannabis Control Commission (CCC). The cultivation and manufacturing will operate in Brookfield MA at 6 Molasses Hill Road in compliance with the town's marijuana zoning bylaw. Cultivation and manufacturing licensees are not permitted to sell to consumers. The retail operation will be at a location to be determined, but will be in compliance with the town's zoning bylaw.

Sunfusions was founded by Brookfield resident David Fromm, a developer who has lived in town for over 18 years. Fromm's background also includes medical lab, wholesale, import, and retail ventures.

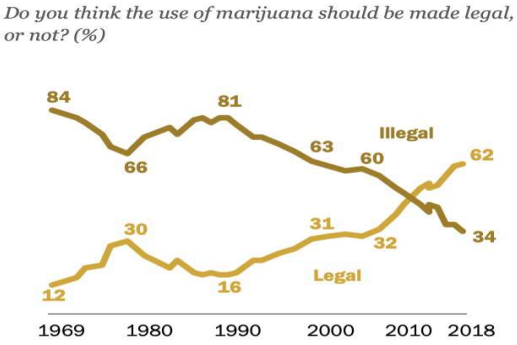
By adhering to industry-leading best practices, we intend to produce the highest quality cannabis products at fair prices to the local adult population.

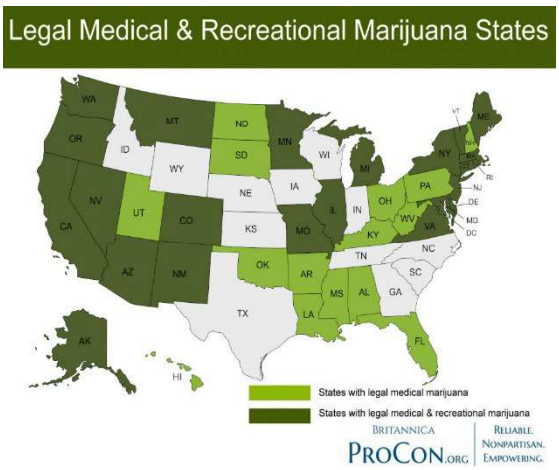
Sunfusions has retained one of the industry's top professionals to consult in all aspects of the business and will soon announce a six sigma Master to assume operational supervision.

Market Overview

National Landscape

Public support for legalizing recreational cannabis has steadily risen from 12% in 1969 to an estimated 62% today. Those in favor understand that this industry will generate billions of dollars for the economy, create hundreds of thousands of jobs, decrease crime, free up police resources, take power and money away from drug cartels and street gangs, and put an end to an unregulated black market.





As of today, 23 states and the District of Columbia have legalized cannabis for recreational adult-use, and 38 states have legalized cannabis for medicinal purposes, illustrating the increasing acceptance throughout the United States and the potential market opportunity presented by a regulated industry. In 2016, the legal cannabis industry generated $7.2 billion in revenue and it is estimated that by 2025, the cannabis industry will exceed $24 billion in annual economic activity.

Massachusetts Market

Massachusetts' adult-use market surpassed $5 billion in gross sales on August 31, 2023, according to the Cannabis Control Commission. Massachusetts continues to report record sales, even as neighboring states come online with their own adult-use markets. This year alone, sales from January to September 2023 have generated over $1.04 billion in Massachusetts. The cannabis industry currently provides approximately 30,000 jobs in the Commonwealth.

Competition

We feel that our decades of experience in a variety of different fields (ie. as employees, business owners, and cannabis connoisseurs), gives us a competitive advantage for true quality within the team and products produced. We believe that diversity is the cornerstone of success and that our unique backgrounds will encourage creativity and drive innovation. Vertical integration will give allow us to operate efficiently and provide value to consumers.

Product Quality and Testing

All cannabis and products must be tested by an independent testing lab for contaminants and impurities (i.e., heavy metals, pesticides and microbial growth) before it can be sold to consumers or transferred to another licensed business. The use of pesticides on cannabis is strictly regulated by the Massachusetts Department of Agricultural Resources (MDAR).

All cannabis in Massachusetts is tracked in the state's seed-to-sale software system provided by METRC®. This tracking system helps prevent theft or diversion and ensures a clear chain of custody for any cannabis product. Any product not to standard will be removed from sales, put in a locked container, the supplier and the Cannabis Control Commission will be notified, and the defective product will be returned to the supplier for proper destruction as outlined in 935 CMR 500.130(5).

Required Product Labeling

All Sunfusions employees will be trained to understand 935 CMR 500.105: General Operational Requirements for Marijuana Establishments and will be trained to identify any products that violate these regulations. Our employees will be required to understand 935 CMR 500.105(5)(c) Labeling of Marijuana Concentrates and Extracts. Our staff will be trained to assure every container holding a cannabis product is properly labeled, contains a warning label and discloses the total THC content. Sunfusions believes it is our responsibility to inspect and identify all products to ensure the safety of our

patrons.

Marketing Strategy
Sunfusions is dedicated to respecting and adhering to the rules and regulations that govern the marketing techniques of cannabis products. Our plan is to promote our product through authorized digital, media and print platforms. Sunfusions will NOT market, advertise or brand:

- In any manner that is deemed deceptive or misleading;
- to audiences under the age of 21 years old;
- In any way that appeals to an audience under the age of 21 years old via promotional giveaways or coupons;
- By any unsolicited means; and/ or
- By any portable means including vehicles, clothing or merchandise.

Our marketing and advertising campaign will focus on maintaining our network and further developing close personal relationships within the cannabis community and adult-use retail locations through:

- Direct, personal communication;
- Subscription via email;
- Web presence; and
- Attending cannabis/hemp/wellness related conventions and events.

We will advertise via appropriate print publications and digital media

Security Plan
A security system including alarms and surveillance that fully comply with the guidelines stated in 935 CMR 500.110 and all other rules and regulations governing the security measures of retail shops will be installed by a licensed and insured vendor. It is of the utmost importance to Sunfusions that the premises, our employees, and the general public are protected and safe while in and around our facility.

Surveillance/ Alarm shall include:

- The outside perimeter shall be sufficiently lit to facilitate surveillance
- Commercial grade security equipment will be installed to alarm the perimeter, including all entry and exit points and windows.
- Video Cameras shall be installed in all points of entry and exit and in the parking lot
- A silent duress alarm shall be installed to notify local law enforcement in an emergency
- Video cameras to run for 24 hours and shall provide date and time stamps
- Video camera shall be installed in all areas that may contain cannabis product

Access:

- Sunfusions will adopt procedures to prevent loitering to ensure that no unauthorized individuals access the facility
- All entrances will be secured to ensure no unauthorized personnel access the facility
- Limited access areas will be designated and labeled as such
- All cannabis products will be secured and locked away to prevent diversion, theft or loss
- Keys and access codes will be accessible specifically to authorized personnel only

- All cannabis products will be kept out of plain sight from the general public
- All employees will wear visible ID badges
- All guests will wear visibly Guest ID Badges

Staff:

- Safety protocol and drills will be implemented and practices in the event of emergency, diversion or theft.
- Staff will undergo regular and updated training and safety awareness

STAFFING & TRAINING

We will recruit staff from the town of Brookfield wherever possible. Preference will be given to Veterans and individuals with knowledge and/or experience in the use of cannabis. It is of utmost importance to Sunfusions that we hire staff that is diverse in age, gender, and race and represents the communities and customers whom we serve.

Staff will be trained in the following topics (including, but not limited to):

1. Marijuana Establishment Agent Training

- Sunfusions will 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, including a Responsible Vendor Program under 935 CMR 500.105(2)(b). At a minimum, staff shall receive eight hours of on-going training annually.

2. Responsible Vendor Training

- 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."
- 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 90 days of hire.
- After the 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."
- Sunfusions will maintain records of responsible vendor training program compliance for four years and make them available for inspection by the Commission and any other applicable licensing authority upon request during normal business hours.
- 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; 500.105(d)(2)(d)

3. General cultivation staff (1-week training/ month "shadowing")

- Training of seed to sale software
- All cultivation related tasks including but not limited to:
    - Seed germination, sexing, cloning, transplanting, cultivar differentiation, pruning, training, watering, nutrient-mixing, ph-ing, environmental and ecosystem regulation, life-cycle determination, pest and pathogen identification, nutrient imbalance identification, drying, proper storage, cleaning and sterilization of facility, and data-logging
- One-day learning tour of RMD
- On-going reviews/corrective action plans

4. Product Manufacturer (2-week training)

- Extensive "shadowing"
- Training of seed to sale software
- One-day learning tour of RMD
- All product manufacturing related tasks including but not limited to:
- Cultivation and Harvesting
- Drying, Curing and Storage
- Product packaging and labeling

5. Transportation Specialist (2-week training)

- Training of seed to sale software
- Creation of transportation manifest
- Two-day shadowing of RMD agents
- One day learning tour of the cultivation facility
- Completion of security service provider's basic practices and policies
- Once operational, new specialists will be required to pair with veteran specialists for a minimum of 1 month
- Manual provided on subjects including:
    - cash handling, safe vehicle operation, law enforcement interaction, radio, and reporting.

6. The overall company policy review will include but not be limited to the following topics:

- Sexual Harassment Policy (Review upon hire and annually with all employees)
- Employee-at-Will
- EEO (Equal Employment Opportunity)
- Other forms of harassment and filing complaints internally and externally with EEOC (Equal Employment Opportunity Commission) and MCAD (Massachusetts Commission Against Discrimination)
- Worksite Safety
- Rules and regulations governing the manufacturing of recreational cannabis
- Anti-diversion
- Facility access and security protocols
- Disaster preparedness
- Alcohol and drug-free work policy
- Employee Performance Evaluations
- Exempt vs. Non-Exempt and Overtime Classification in accordance with FLSA law (Non-Exempt employees who work in excess of 40 hours in any given 7-day week will receive 1.5

times the employee's hourly rate in accordance with federal and state law)

- FMLA and MMLA (Eligibility and Rights)
- Insurance benefits
- Benefit Time
- Workers Compensation
- Unemployment Compensation

Plan for Obtaining Liability Insurance

Sunfusions intends to obtain and maintain general liability insurance coverage for no less than $1,000,000 per occurrence and $2,000,000 in aggregate, annually, and product liability insurance coverage for no less than $1,000,000 per occurrence and $2,000,000 in aggregate, annually, except as provided in 935 CMR 500.105(10)(b) or otherwise approved by the Commission. The deductible for the policy shall be no higher than $5,000 per occurrence.

Sunfusions has already sought out quotes from liability insurance companies. Sunfusions intends to start policy coverage shortly after submission of the CCC application and will ensure that a compliant policy is in effect prior to operations.

Quality Control and Testing

Quality Control

Sunfusions will comply with the following requirements to maintain quality:

1. Any Sunfusions agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000, and all edible marijuana products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 500.000, and with the requirements for food handlers specified in 105 CMR 300.000.
2. Any Sunfusions agent working in direct contact with preparation of marijuana or nonedible marijuana products will conform to sanitary practices while on duty, including:
    a. Maintaining adequate personal cleanliness; 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.
3. Sunfusions' hand-washing facilities will be adequate and convenient and will be furnished with running water at a suitable temperature. Hand-washing facilities will be located in Sunfusions' production areas and where good sanitary practices require employees to wash and sanitize their hands, and will provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
4. Sunfusions' facility will have sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. Sunfusions will ensure that litter and waste is properly removed and disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal will be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
6. Sunfusions' floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair;
7. Sunfusions' facility will have adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. Sunfusions' buildings, fixtures, and other physical facilities will be maintained in a sanitary condition;
9. Sunfusions will ensure that all contact surfaces, including utensils and equipment, will be maintained in a clean and sanitary condition. Such surfaces will be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent

registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils will be so designed and of such material and workmanship as to be adequately cleanable;

10. All toxic items will be identified, held, and stored in a manner that protects against contamination of marijuana products;
11. Sunfusions will ensure that its water supply is sufficient for necessary operations, and that such water supply is safe and potable;
12. Sunfusions' plumbing will be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the marijuana establishment. Plumbing will properly convey sewage and liquid disposable waste from the marijuana establishment. There will be no cross-connections between the potable and wastewater lines;
13. Sunfusions will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
14. Sunfusions will hold all products that can support the rapid growth of undesirable microorganisms in a manner that prevents the growth of these microorganisms; and
15. Sunfusions will store and transport finished products under conditions that will protect them against physical, chemical, and microbial contamination, as well as against deterioration of finished products or their containers.
16. When processing marijuana, Sunfusions will comply with the requirements of 935 CMR 500.105(3) and shall process the leaves and flowers only, and shall ensure that the marijuana is well-cured, free of seeds and stems, free of dirt, sand, debris, and other foreign matter, and free of contamination by mold, rot, fungus, or pests. as required by 105 CRM 500.00 and, if applicable, 105 CMR 590.000: State Sanitary Code Chapter X. Processing and packaging of marijuana will be done in a secure area on food-grade stainless steel tables, and the agents will not touch the marijuana with their bare hands.
17. Sunfusions will ensure that Sunfusions' facility is always maintained in a sanitary fashion and will comply with all applicable sanitary requirements.
18. Sunfusions' vehicles and transportation equipment used in the transportation of marijuana products or edibles requiring temperature control for safety will be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the marijuana products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c).
19. Sunfusions will follow established policies and procedures for handling voluntary and mandatory recalls of marijuana products. Such procedures are sufficient to deal with recalls due to any action initiated at the request or order of the Commission, and any voluntary action by Sunfusions to remove defective or potentially defective marijuana products from the market, as well as any action undertaken to promote public health and safety.

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

Testing

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

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

Sunfusions will maintain testing results in compliance with 935 CMR 500.000 et seq and its own record keeping policies, and will maintain the results of all testing for no less than one year.

All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services will comply with 935 CMR 500.105(13). All storage of Sunfusions' marijuana at a laboratory providing marijuana testing services will comply with 935 CMR 500.105(11). All excess marijuana will be disposed of in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to Sunfusions for disposal or by the Independent Testing Laboratory disposing of it directly. Any marijuana products with testing dates in excess of one year old will be deemed expired and may not be dispensed, sold, transferred or otherwise conveyed until retested.

Should laboratory results indicate contaminant levels above acceptable limits established in the DPH protocols identified in 935 CMR 500.160, Sunfusions will notify the CCC within 72 hours if such results indicate that the contamination cannot be remediated, and the production batch will be destroyed and disposed of properly, in accordance with 935 CMR 500.105(12). Such a notification will include a proposed plan for destruction of the product, and assessment of the source of contamination. A failed batch may be submitted for reanalysis pursuant to 935 CMR 500.160(13), but any marijuana that fails the second test may not be sold or transferred without first being remediated. If remediation of contamination is possible, Sunfusions will re-submit a batch sample for testing after remediation efforts have been made. If Sunfusions reasonably believes that a failed test was in error, they may submit a batch sample for re-testing to an Independent Testing Laboratory other than the laboratory which provided the initial failed

result. Any failing marijuana may be remediated a maximum of two times. If the marijuana fails testing after the second remediation, it must be destroyed in compliance with 935 CMR 500.105(12).

Should voluntary or mandatory recalls of marijuana may be made by either Sunfusions or the CCC in order to remove defective, or potentially defective marijuana products from the market in an effort to promote public health and safety, Sunfusions will follow an established set of written policies to effect such a recall. Any outdated, spoiled, damaged, deteriorated, mislabeled or contaminated inventory will be destroyed and disposed of as per 935 CMR 500.105(12).

Personnel Policies Including Background Checks

Sunfusions will securely maintain personnel records, including registration status and background check records that include:

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

Agent Personnel Records

In compliance with 935 CMR 500.105(9), personnel records for each agent will be maintained for at least twelve (12) months after termination of the agent's affiliation with Sunfusions and will include, at a minimum, the following:

1. All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
2. Documentation of verification of references;
3. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
4. Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
5. Documentation of periodic performance evaluations;
6. A record of any disciplinary action taken;
7. Notice of completed Responsible Vendor Training and eight-hour related duty training; and results of initial background investigation, including CORI reports.

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

Agent Background Checks and Suitability

All agents hired to work for Sunfusions will register as an agent with the CCC and undergo a background investigation prior to being granted access to a Sunfusions facility or beginning work duties, as required

under 935 CMR 500.030 and 935 CMR 500.101(1)(b). Documentation of every agent's registration status will be maintained within each agent's personnel record.

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

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

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

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

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

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

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

2. Consider whether offenses or information that would result in a Presumptive Negative Suitability Determination under 935 CMR 500.802. In the event a Presumptive Negative Suitability Determination is made, Sunfusions will consider the following factors:

    a. Time since the offense or incident;
    b. Age of the subject at the time of the offense or incident;
    c. Nature and specific circumstances of the offense or incident;
    d. Sentence imposed and length, if any, of incarceration, if criminal;
    e. Penalty or discipline imposed, including damages awarded, if civil or administrative;
    f. Relationship of offense or incident to nature of work to be performed;
    g. Number of offenses or incidents;
    h. Whether offenses or incidents were committed in association with dependence on drugs or alcohol from which the subject has since recovered;
    i. If criminal, any relevant evidence of rehabilitation or lack thereof, such as information about compliance with conditions of parole or probation, including orders of no contact with victims and witnesses, and the subject's conduct and experience since the time of

the offense including, but not limited to, professional or educational certifications obtained; and

j. Any other relevant information, including information submitted by the subject.

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

All suitability determinations will be documented in compliance with all requirements set forth in 935 CMR 500 et seq. and guidance provided by the Commission.

Agents, volunteers, contractors, and subcontractors are required to renew their suitability determination annually and submit to other background screening as may be required by Sunfusions or the CCC, as a condition of continued employment.

Personnel Policies and Training

As outlined in Sunfusions' Record Keeping Procedures, a staffing plan and staffing records will be maintained in compliance with 935 CMR 500.105(9) and will be made available to the Commission, upon request. All Sunfusions agents are required to complete training as detailed in Sunfusions' Qualifications and Training plan which includes but is not limited to the Sunfusions' strict alcohol, smoke and drug-free workplace policy, confidentiality training including how confidential information is maintained at the marijuana establishment and a comprehensive discussion regarding the marijuana establishment's policy for immediate dismissal.

Sunfusions will have a policy for the immediate dismissal of any dispensary agent who has:

1. Diverted marijuana, which will be reported the Police Department and to the CCC;
2. Engaged in unsafe practices with regard to Sunfusions operations, which will be reported to the CCC; 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.

Code of Conduct

We will comply with all applicable laws and regulations and expect our employees to conduct business in accordance with the letter, spirit, and intent of all relevant laws. This includes refraining from any illegal, dishonest, or unethical conduct. We will always act with fairness and integrity. Our Code of Conduct includes the Alcohol, Smoke-Free, and Drug-Free Workplace Policy, the Confidential Information, Whistleblower, Conflicts of Interest, and Disabilities Policies. The following is a non-exhaustive list of conduct that may violate this policy: falsifying records, engaging in fraud, removing employer property

from the premises without authorization, stealing or attempting to steal employer or employee property, being habitually tardy or absent, engaging in poor timekeeping, fighting on employer property at any time, being insubordinate, using offensive language on company premises, bringing dangerous or unauthorized weapons onto company premises, engaging in criminal activity, neglecting job duties, and bringing the organization into serious disrepute.

Any employee in violation of this Code of Conduct will be subject to disciplinary action, up to and including termination.

Alcohol, Smoke-Free, and Drug-Free Workplace

Pursuant to 935 CMR 500.105(1), Sunfusions will maintain a set of alcohol, smoke and drug-free workplace policies so as to identify and remove the adverse effects of alcohol and drugs on job performance and protect the health and safety of employees. Use and misuse of alcohol or drugs can and does impair the ability of an employee to perform their duties and may endanger the employee, co-workers, and the public as well as property. The following policies are subject to amendment and expansion as needed on an ongoing basis by management:

1. Cannabis use or consumption is prohibited on the premises, including vehicles and parking lots.
2. Tobacco smoking is prohibited within the Establishment, as well as within 20 feet of the building.
3. Alcoholism and other drug addictions are recognized as diseases responsive to proper treatment, and this will be an option as long as the employee cooperates.
4. The manufacture, distribution, dispensing, possession, sale, purchase or use of a controlled substance on company property is prohibited, with the exception of products produced and sold as part of Sunfusions' licensed cannabis operations within the Establishment.
5. Being under the influence of alcohol or illegal drugs on company property is prohibited. The unauthorized use or possession of prescription drugs or over-the-counter drugs in the Establishment is prohibited.
6. Employee possession of legally obtained cannabis products in forms and amounts within legal guidelines and limits is allowed on premises (but not within the building) provided such products are kept safely out of public view within securely locked personal vehicles. Searches on company premises and company property can be conducted at any time.
7. Any employee involved in a work-related accident may be subject to urine and breath testing.
8. Employees who violate this Policy are subject to appropriate disciplinary action including termination.
9. The Policy applies to all employees of the company and includes temporary and part-time employees.

Confidential Information

Pursuant to 935 CMR 500.105(1)(l), all Confidential Information, including but not limited to M.G.L. c. 4, § 7, cl. 26 and M.G.L. c. 94I, § 3, will be maintained in a secure limited-access location, kept separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the Commission may access this information to carry out its official duties.

Whistleblower Policy

Sunfusions conducts business in accordance with all applicable laws and the highest professional standards. Illegal activity, misconduct, or wrongful behavior by anyone engaged in Company-related business, whether an employee or a person outside the organization, is not tolerated. Employees are encouraged to report any actual or suspected improper activity as soon as possible so that it can be investigated and appropriate action taken.

We will not retaliate against any individual for making a bona fide report of actual or suspected misconduct under this policy or for assisting in an investigation, even if the individual is found to be in error. However, if after an investigation, we determine that the report of conduct is not bona fide or that an individual has provided false information regarding the report, disciplinary action, up to and including termination, may be taken against the individual who gave the false report of information.

Conflicts of Interest

Sunfusions insists on the undivided loyalty of all employees, including management and non-management staff, except to the extent doing so would be inconsistent with applicable law. Subject to that caveat, employees must not engage in any conduct, and must avoid situations that would create an actual or potential conflict of interest or create the appearance of such a conflict. Conflicts of interest arise when an employee's personal activity or personal interest is contrary to the interests of the company. These personal activities or interests may influence the employee's judgment, causing the employee to make decisions based upon the potential for personal gain, rather than in the best interests of the company. To prevent conflicts of interest, the following behavior is deemed unacceptable and unethical, except to the extent the law provides otherwise:

1. Receiving or giving of merchandise, money, services, travel, accommodations, or lavish entertainment that might appear to have been given to influence a business decision. Gifts offered or received at any time that are of more than minimal or token value shall not be accepted and shall be returned to the sender with an appropriate explanatory note or letter;
2. Maintaining personal, business, or financial relationships with a patient or vendor where the employee has control or influence over the company's relationship with that patient or vendor. For example, employees should not borrow from or lend personal funds to a customer or vendor;

3. Using information developed or learned on the job for personal or familial benefit. This includes the use of company databases, financial information, and intellectual property;
4. Conducting company business with, or using position or authority to influence the company to conduct business with, family members; and,
5. Unauthorized sharing of confidential or proprietary company-related information with business associates or representatives of other companies.

The list above serves only to illustrate sources of possible conflicts of interest and does not constitute a complete list of all the situations that may result in a conflict of interest. Ultimately, it is the responsibility of each employee to avoid any situation that could affect his/her/their ability to judge situations independently and objectively, and any situation that could even appear to be a conflict of interest. It is important to note that under certain circumstances, conflicts of interest can amount to violations of criminal law. Any doubts should be resolved in a discussion with a manager.

Disabilities

Sunfusions complies with the Americans with Disabilities Act (ADA) providing for nondiscrimination and accommodation in employment of qualified individuals with disabilities, including conditions caused by pregnancy, childbirth, or other related medical conditions. Qualified individuals with disabilities, including conditions caused by pregnancy, childbirth, or other related medical conditions, may make requests for reasonable accommodation to management. Requests for accommodation will be evaluated to determine if the request can be granted without undue hardship on the Company.

Sunfusions will not retaliate against any individual for requesting a reasonable accommodation and will attempt to keep the details of the request confidential as far as reasonably possible.

Each new employee will be notified of their rights under https://www.mass.gov/service-details/about-employment-rights.

Recordkeeping Procedures

Sunfusions has established policies regarding recordkeeping to ensure the safe keeping, maintenance, and accessibility of essential information and documents. Records will be stored at Sunfusions in a locked room designated for record retention. All written records will be available for inspection by the Commission upon request.

1) Recordkeeping

To ensure that Sunfusions is keeping and retaining all records as noted in this policy, reviewing Corporate Records, Business Records, and Personnel Records to ensure completeness, accuracy, and timeliness of such documents will occur as part of Sunfusions' quarter-end closing procedures. In addition, Sunfusions' operating procedures will be updated on an ongoing basis as needed and undergo a review by the management on an annual basis.

2) Corporate Records

Those records that require, at a minimum, annual reviews, updates, and renewals, including:

1. Insurance Coverage: Directors & Officers Policy; Product Liability Policy; General Liability Policy; Umbrella Policy; Workers Compensation Policy; Employer Professional Liability Policy

2. Third-Party Contracts

3. CCC Requirements:
    a. Annual Agent Registration and training
    b. Annual Marijuana Establishment Registration

4. Local and Municipality Compliance:
    a. Certificate of Occupancy
    b. Special Permits
    c. Variances
    d. Site Plan Approvals
    e. As-Built Drawings

5. Corporate Governance:
    a. Annual Report
    b. Secretary of State Filings

3) **Business Records**

Records that require ongoing maintenance and updates. These records will be prepared in accordance with Generally Accepted Accounting Principles (GAAP), and can be electronic or hard copy and at minimum include:

1. Assets and liabilities;
2. Monetary transactions;
3. Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
4. Sales records including the quantity, form, and cost of marijuana products;
5. Salary and wages paid to each agent, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with Sunfusions, including members, if any.

4) **Personnel Records**

At a minimum, personnel records will include:

1. Job descriptions for each agent and volunteer position, as well as organizational charts consistent with the job descriptions;
2. A personnel record for each marijuana establishment agent. Such records will be maintained for at least twelve (12) months after termination of the agent's affiliation with Sunfusions and will include, at a minimum, the following:
    a. All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
    b. Documentation of verification of references;
    c. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
    d. Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
    e. Documentation of periodic performance evaluations;
    f. A record of any disciplinary action taken;
    g. Notice of completed responsible vendor and eight-hour related duty training.
3. A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
4. Personnel policies and procedures, including a Code of Ethics, as Whistleblower policy, and a policy which notifies persons with disabilities of their rights and includes provisions prohibiting discrimination and providing reasonable accommodation;
5. All background check reports obtained in accordance with 935 CMR 500.030; and
6. Pursuant to 803 CMR 2.04: iCORI Registration, shall retain a Criminal Offender Record Information (CORI) report and any other background check information required by the CCC.

5) Seed-to-Sale Tracking Records

Sunfusions will use Metrc to maintain real-time inventory. Metrc inventory reporting meets the requirements specified by the Commission and 935 CMR 500.105(8)(c) and (d), including, at a minimum, an inventory of marijuana plants; marijuana plant-seeds and clones in any phase of development such as propagation, vegetation, flowering; marijuana ready for dispensing; all marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.

Inventory records will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory.

6) Handling and Testing of Marijuana Records

Sunfusions will maintain the results of all testing for a minimum of one (1) year.

7) Inventory Records

The 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.

8) Incident Reporting Records

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

9) Visitor Records

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

10) Waste Disposal Records

When marijuana or marijuana products are disposed of, Sunfusions will create and maintain a written record of the date, the type and quantity disposed of or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two Sunfusions agents present during the disposal or handling, with their signatures, in compliance with 935 CMR 500.105(12).

Sunfusions will keep disposal records for at least three (3) years. This period will automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.

11) Security Records

Sunfusions' security records will include (i) A current list of authorized agents and service personnel that have access to the surveillance room will be available to the Commission upon request; (ii) Twenty-four (24) hour recordings from all video cameras that are available for immediate viewing by the Commission upon request and that are retained for at least ninety (90) calendar days; (iii) Security system recordings will be maintained in a secure location to prevent loss, theft, alteration, or destruction; and (iv) A copy of all security plans and procedures to be shared with law enforcement.

12) Transportation Records

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

13) 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 place he or she received the training, the topics discussed and the name and title of the presenter(s).

14) Written Operating Policies and Procedures

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

1. Security measures in compliance with 935 CMR 500.110;
2. Agent security policies, including personal safety and crime prevention techniques;
3. A description of Sunfusions' hours of operation and after-hours contact information, which will be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
4. Storage of marijuana in compliance with 935 CMR 500.105(11);
5. Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be dispensed;
6. Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.160;

7. Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160, and retention of laboratory testing results;
8. A staffing plan and staffing records in compliance with 935 CMR 500.105(9);
9. Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
10. Alcohol, smoking, and drug-free workplace policies;
11. A plan describing how confidential information will be maintained;
12. Policy for the immediate dismissal of any dispensary agent who has:
    a. Diverted marijuana, which will be reported to the police department and to the Commission;
    b. Engaged in unsafe practices with regard to Sunfusions operations, which will be reported to the Commission; or
    c. 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.
13. A list of all executives of Sunfusions, 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 Sunfusions' website.
14. Policies and procedures for the handling of cash on Sunfusions premises including but not limited to storage, collection frequency and transport to financial institutions.
15. Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.
16. Policies and procedures for energy efficiency and conservation that will include:
    a. Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;
    b. Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on site, and an explanation of why the identified opportunities were not pursued, if applicable;
    c. Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
    d. Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25 § 21, or through municipal lighting plants.

17. Policies and procedures to promote workplace safety consistent with OSHA standards, including plans to identify and address any biological, chemical, or physical hazards, including a hazard communication plan, personal protective equipment assessment, fire protection plan, and an emergency action plan.

15) Record-Retention

Sunfusions will meet Commission recordkeeping requirements and retain a copy of all records for two (2) years, unless otherwise specified in the regulations.

16) Deficiency Statements

After an inspection in which a violation is observed or determined to have occurred, the CCC deficiency statement citing every violation will be retained by Sunfusions for no less than two (2) years.

17) Closure

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

.

Maintaining of Financial Records

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

1. All recordkeeping requirements under 935 CMR 500.105(9) are followed, including keeping written business records, available for inspection, and in accordance with generally accepted accounting principles, which will include manual or computerized records of:
    a. Assets and liabilities;
    b. Monetary transactions;
    c. Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
    d. Sales records including the quantity, form, and cost of marijuana products;
    e. Salary and wages paid to each employee and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a marijuana establishment, including members, if any.
2. All sales recording requirements under 935 CMR 500.140(6) are followed, including:
    a. Utilizing a point-of-sale (POS) system approved by the Commission, in consultation with the DOR, and a sales recording module approved by DOR;
    b. 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;
    c. Complying with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements;
    d. Adopting separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales;
    e. 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;
    f. If colocated with a medical marijuana treatment center, maintaining and providing the Commission on a biannual basis accurate sales data collected by the licensee during the six months immediately preceding this application for the purpose of ensuring an adequate supply of marijuana and marijuana products under 935 CMR 500.140(10).
3. Additional written business records will be kept, including, but not limited to, records of:
    a. 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);

b. Fees paid under 935 CMR 500.005 or any other section of the Commission's regulations;

c. Fines or penalties, if any, paid under 935 CMR 500.550 or any other section of the Commission's regulations.

d. Local, state and federal tax payments.

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

5. All financial records shall be retained for a minimum of two years following closure of the business and shall be accessible to the CCC as per 935 CMR 500(105(9)(g).

Diversity Plan

Sunfusions promotes diversity, inclusion and equity in its own workplaces and the cannabis industry generally and believes that diversity is an essential element of a company's relationship to its community, and intends to increase diversity both internally and in the industry and community with this Diversity Plan. Sunfusions will promote equity among women, veterans, minorities, LGBTQ+ and persons with disabilities with the following goals:

Goals

1) Ensure a diverse company by hiring and maintaining 40% diverse staff.
2) Support and enhance industry and community diversity by having 40% of its contracting with diverse businesses.

Programs

Hiring Goal:

When Sunfusions hires temporary, seasonal or permanent staff, we will hire 40% diverse individuals, and shall make best efforts to achieve the following ratios: 30% of hires shall be women; 30% of hires shall be people of color (particularly Black, African American, Latinx and Indigenous people), 20% shall be veterans, 10% shall be LGBTQ+, and 10% shall be persons with disabilities.

If recruitment efforts are necessary to achieve staffing goals, such efforts will include the following programs:

1. Developing relationships with businesses owned and/or managed by minorities, women, veterans, LGBTQ+ and persons with disabilities. Such businesses will be identified for purposes of achieving our Contracting Goal (i.e., utilizing the SDO directory and the CCC public documents and public data). Sunfusions will make best efforts to establish a referral network among the businesses it engages for the purpose of referring and being referred diverse candidates for employment.
2. Encourage employees from diverse groups to refer applicants for employment.
3. Ensure that any job posting contains a statement similar to the following: "Sunfusions encourages applications from qualified candidates from underrepresented communities, such as women, people of color, veterans, LGBTQ+ and/or persons with disabilities."
4. Publication of job postings in local and diverse resources including the *Gazette*, *Worcester Telegram*, and websites including Indeed and LinkedIn.
5. Job postings shall be advertised at least once every time a job opening exists but shall be no less than one (1) time per year.

Sunfusions is committed to supporting its workforce and retaining diversity by implementing policies that facilitate long-term employment and promotion. Specifically, Sunfusions will work with staff to mitigate difficulties resulting from circumstances that may impact an individual's ability to work or be promoted,

such as transportation problems, work schedule flexibility, and family leave needs, to the extent our operation permits. Applicants will be asked what, if any, concerns they have regarding employment with Sunfusions and the company will work diligently, and in good faith, to offer solutions to such challenges.

Contracting Goal:

Sunfusions will use best efforts to source service providers and wholesale partners who are owned by or whose employees are women, veterans, minorities, LGBTQ+, and/or people with disabilities.

Our goal is that 40% of our contracting will comprise some combination of women (30%), minorities (30%), veterans (20%), LBGTQ+ (10%), and/or people with disabilities (10%).

Sunfusions will utilize the Massachusetts Supplier Diversity Office's (SDO) listing of diversity-certified businesses to identify and verify diverse business ownership. Sunfusions will also utilize the CCC public documents to identify licensed cannabis businesses with diverse ownership. Our online presence will promote that priority will be given to individuals or businesses owned by, or whose employees are, predominantly women, veterans, minorities, LGBTQ+ and/or people with disabilities. Sunfusions is committed to implementing this policy on a day-to-day basis throughout all operations and transactions and will assess potential vendor and wholesale partners in light of this goal.

Metrics

Sunfusions will count the number of employees hired who are women, veterans, people of color, LGBTQ+ and/or persons with disabilities. This number will be assessed from the total number of individuals hired to ensure that the percentage of all individuals hired falls within the hiring goals outlined above. Sunfusions will assess this percentage upon any staffing change to remain on target. Sunfusions will document and report the number of job postings and where the postings were listed.

Sunfusions will report both the actual number and the percentage of diverse contractors, wholesale partners and vendors with which Sunfusions does business.

Acknowledgments

Sunfusions pledges to adhere to the requirements set forth in 935 CMR 500.104(4)(a) which provides the permitted advertising, branding, marketing, and sponsorship practices for all marijuana establishments. Sunfusions likewise pledges not to employ any of the prohibited practices articulated in 935 CMR 500.105(4)(b). Finally, none of the actions taken or programs instituted will violate the commission's regulations with respect to limitations on ownership or control or any other applicable state laws.

Sunfusions acknowledges that the progress or success of its Diversity Plan must be documented upon license renewal (one year from provisional licensure, and each year thereafter).

Qualifications and Training

Sunfusions will ensure that all employees will be qualified to work as a marijuana establishment agent and properly trained to serve in their respective roles in a fully compliant manner.

Qualifications

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

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

Training

In accordance with 935 CMR 500.105(2), and prior to performing any job functions, each of Sunfusions' agents will successfully complete a training program that is appropriate for the roles and responsibilities of the agent's job. Agent training will at minimum include the Responsible Vendor Training Program and eight (8) hours of on-going training annually.

All Sunfusions' current owners, managers, and employees will have attended and successfully completed a Responsible Vendor Training Program operated by an education provider accredited by the Commission to provide the annual minimum of two hours of responsible vendor training to marijuana establishment agents. Sunfusions' new, non-administrative employees will complete the Responsible Vendor Training Program within 90 days of the date they are hired. Sunfusions' owners, managers, and employees will then successfully complete the program annually thereafter. Sunfusions will also encourage administrative employees who do not handle or sell marijuana to take the responsible vendor program on a voluntary basis to help ensure compliance. Sunfusions' records of responsible vendor training program compliance will be maintained for at least four (4) years and made available during normal business hours for inspection by the Commission and any other state licensing authority upon request.

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

i. Marijuana's effect on the human body, including physical effects based on different types of marijuana products and methods of administration, and recognizing the visible signs of impairment;

ii. Best practices for preventing diversion and preventing sales to minors;

iii. Compliance with tracking requirements and Metrc;

iv. Acceptable forms of identification, including verification of valid photo identification and medical marijuana registration and confiscation of fraudulent identifications;

v. Such other areas of training determined by the Commission to be included; and

vi. Other significant state laws and rules affecting operators, such as:

1. Local and state licensing and enforcement;
2. Incident and notification requirements;
3. Administrative and criminal liability and license sanctions and court sanctions;
4. Waste disposal and health and safety standards;
5. Patrons prohibited from bringing marijuana onto licensed premises;
6. Permitted hours of sale and conduct of establishment;
7. Permitting inspections by state and local licensing and enforcement authorities;
8. Licensee responsibilities for activities occurring within licensed premises;
9. Maintenance of records and privacy issues; and
10. Prohibited purchases and practices.

Energy Compliance Plan

Sunfusions will adopt and use best management practices as determined by the CCC to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts, and shall provide report such energy usage to the CCC as required. The procedures listed below are a part of the Energy and Resource Conservation practices Sunfusions plans to implement.

Sunfusions is committed to identification of potential energy use reduction opportunities and a plan for implementation of such opportunities, pursuant to *935 CMR 500.105(15).*

Sunfusions has identified opportunities to reduce energy use in the retail establishment, including natural lighting and LEDs, efficient insulation, smart or programmable thermostats, and high-efficiency HVAC equipment.

Sunfusions will monitor energy consumption and regularly assess the effectiveness of operational changes in reducing energy consumption.

- As Sunfusions engages in renovations, expansions, or upgrades, or replaces or repairs equipment, Sunfusions will actively identify opportunities to implement energy efficiency measures.
- Sunfusions will identify energy saving opportunities when equipment fails or needs replacement.
- Regardless, Sunfusions will satisfy minimum energy efficiency standards established by the CCC and shall comply with all applicable environmental laws, regulations, and permits.

Sunfusions will consider 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, as per *935 CMR 500.105(15)*. Sunfusions will:

- Make energy supply decisions and regularly evaluate renewable options based on the available options for renewable energy;
- Identify renewable or alternative energy opportunities as part of any facility upgrades, renovations, or expansions;
- Identify renewable or alternative energy opportunities when equipment fails or needs to be replaced.
- Sunfusions will also consider opportunities for renewable energy generation whenever it repairs or replaces equipment, or engages in facility expansion or renovations

Sunfusions will employ strategies to reduce electric demand (such as lighting schedules, active load management, and energy storage), in compliance with 935 CMR 500.105(15). Sunfusions will:

- Monitor energy demand and make adjustments to operations based on usage data;
- Participate in load curtailment, energy storage, or other active demand management programs to the extent applicable to our operations.

Sunfusions will engage with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants. 935 CMR 500.105(15). Sunfusions will utilize the MassSave programs which offer energy assessments and incentives to upgrade to energy-saving equipment and systems. The MassSave Sponsor for Sunfusions is National Grid. Sunfusions will request the Sponsor's assistance in auditing energy usage and identifying ways to save energy, including updating or retrofitting equipment, and controlling equipment for occupancy changes throughout the day.

Sunfusions will ensure on a regular basis that equipment is maintained, calibrated, and operating properly. Including, but not limited to, maintaining operations manuals and operating procedures for all major energy-using equipment, such as lighting and HVAC systems.

Sunfusions retail facility shall meet all applicable environmental laws, regulations, permits and other appliable approvals, including those related to water quality and quantity, wastewater, solid and hazardous waste management and air pollution control, including prevention of odor and noise pursuant to 310 CMR 7:00: *Air Pollution Control*, and to use additional best management practices to reduce energy and water usage, conserve energy, and mitigate environmental impacts, as determined by the CCC and other government bodies.

Restricting Access to Age 21 and Older

Sunfusions' operating policies and methodologies are designed to prevent diversion, theft, and any illegal or unauthorized conduct pursuant to 935 CMR 500. Measures to prevent diversion and to limit access to appropriately-aged individuals include policies and procedures requiring the following:

- All employees and registered agents must be 21 years of age or older, as per 935 CMR 500.030.
- All consumers entering a Marijuana Retailer must be 21 years of age or older unless the establishment is co-located with a Medical Marijuana Treatment Center as per 935 CMR 500.050(5).
- All visitors must be 21 years of age or older. *935 CMR 500.002.*
- All retail customers will be subject to on-premises verification identification requirements pursuant to 935 CMR 500.140(2), and must present valid government-issued ID before being permitted on to the sales floor. Entry occurs through a vestibule staffed by a Sunfusions agent.
- Customer ID must be checked once more at retail Point of Sale prior to purchase.
- There will be no window displays, no product depictions, and no overt cannabis references in store name or signage. Sunfusions will only engage in advertising, marketing or branding that complies with 935 CMR 500.105(4).
- Sunfusions' website will require all online visitors to verify they are at least 21 years of age.
- All products will be packaged in child-resistant containers with appropriate labeling including required warnings and marks.
- Full perimeter and facility video surveillance will prevent and detect diversion and unauthorized access.
- All access areas (doors, windows, etc.) will be hardened and secured, with appropriate locks and signage.