

# 253 Organic, LLC Management Operations and Policies

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## A) Hours of Operation

*The Cultivation, Kitchen, Extraction location will be operating between the hours of 7:00 a.m. And 6:00 p.m.*

*The Retail Dispensary location will be operating between the hours of 9:00 a.m. And 8:00 p.m.*

## B) Job Descriptions and Employment Contracts

### 1. Job Descriptions and Employment Contracts

*Attached as Exhibit A are the Job Descriptions of key positions within the Facilities. Each description includes a more detailed description of the Personnel Duties and Responsibilities, Authority, and Qualifications of each position. Those positions include:*

- 1.a. Director of Operations
- 1.b. Cultivation Manager
- 1.c. Dispensary Manager
- 1.d. Kitchen Manager
- 1.e. Extraction Manager
- 1.f. Master Cultivator
- 1.g. Senior Cultivation Technician
- 1.h. Harvest Quality Control Technician

### 2. Personnel Supervision

*The Director of Operations (Seth Rutherford) is responsible for all employee supervision at the Company. There will be four intermediary managers. All cultivation employees will report to the Cultivation Manager. All kitchen employees will report to the Kitchen Manager. All extraction employees will report to the Extraction Manager. All Dispensary employees will report to the Dispensary manager.*

### 3. Training & Confidentiality 935 CMR 500.105 (B)

*The Cultivation, Kitchen, Extraction, Dispensary Managers will conduct in-person and hands-on training for all new employees upon hire and for all current employees no less than annually, within the cultivation building. The Dispensary Manager will conduct in-person and hands-on training for all new employees upon hire and for all current employees no less*

*than annually, within the Dispensary building. Such training will cover no less than 8 hours of instruction and will be documented with sign in and sign out sheets for every employee that indicate the time, date, place and substance of such training. Attached as Exhibit M is a copy of the Employee Training Acknowledgement Form. Training topics conducted by the Manager(s) will include:*

- 3.a. Employee Handbook and Job Descriptions
- 3.b. Employment Laws and Employee Rights
- 3.c. Cultivation Operations and Administration as detailed in (935 CMR 500.105)
- 3.d. Kitchen/Extraction Operations and Administration as detailed in (935 CMR 500.105)
- 3.e. Dispensary Operations and Administration as detailed in (935 CMR 500.105)

#### **4. Performance Evaluations**

*The Manager(s) will conduct in-person employee performance evaluations for all new employees after 6 months of employment and for all current employees no less than annually, within the cultivation building. Performance evaluations will be recorded on the Employee Performance Evaluation Form attached as Exhibit C.*

#### **5. Disciplinary Actions**

*The Manager(s) will be responsible for taking disciplinary actions against any employee. The Managers will follow the guidelines of the Progressive Discipline Policy attached as Exhibit D. Disciplinary action will be documented by the Manager(s) according to the requirements of the attached Progressive Discipline Policy and regulations promulgated by the Commission.*

#### **6. Employment Contracts**

*The Company will not utilize written employment contracts with any of its employees. All of the Companies employees will be employed under verbal at-will contracts, subject to the terms and conditions of the Employee Handbook attached as Exhibit E.*

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### **D) Terms**

1. Marijuana will be referenced in this document as “*cannabis*”
2. Cultivation, Kitchen, Extraction will be referenced as “Cultivation” as they are in the same building
3. Employee's with approved Marijuana Establishment Agent Registration Card will be referred to as “agent(s)”
4. 253 Organic, LLC will be referred to as “ Company” and refers to activities of Cultivation, Dispensary, Kitchen and Extraction.
5. Retail Dispensary will be referred to as “ Dispensary”
6. Cultivation, Dispensary, Kitchen and Extraction individually are referred to as a “site(s)”

### **E) Business Records (935 CMR 500.105 (I))**

#### **1. Records**

*The Companies business records shall be created, stored, maintained and retained by the Dispensary in accordance with all rules and regulations promulgated by the Commission, and applicable City and County Ordinances, as well as any other applicable rules, regulations and laws. The Company will maintain business records according to the requirements of the Document Retention Policy attached as Exhibit F. Maintained business records will include, but not be limited to the following items:*

- a. Corporate Records
- b. Accounting and Financial Records
- c. Correspondence and Internal Memoranda
- d. Electronic Documents
- e. Legal Files and Papers
- f. Insurance Records
- g. Payroll Documents
- h. Personnel Records
- i. Property Records
- j. Tax Records
- k. Media/Marketing Materials
- l. Miscellaneous Records

## 2. Retention

### a.a. Method(s)

*The method of the Companies business record retention will depend on the type of business record to be retained. The Business Record Retention Policy attached at Exhibit F lays out in great detail the method of retention for a given business record.*

### a.b. Time-Frame

*The time-frame of the business record retention will depend on the type of business record to be retained. The Business Record Retention Policy attached at Exhibit F lays out in great detail the time-frame of retention for a given business record.*

## **F) Inventory Control (935 CMR 500.105 (H)(3)(4))**

*The Company has contracted with and will utilize at all times a comprehensive internet-based cannabis inventory control system known as Flowhub.*

### **1. Inventory Control System**

*The Companies inventory control system, known as Flowhub, is an internet-based comprehensive cannabis inventory and sales tracking system that is guaranteed to comply with all Commission's regulations pertaining to the cultivation, processing, tracking, identification, transfer, transportation and sale of cannabis. The Flowhub inventory control system is both Cultivation, Infused Products, Dispensary, Extraction focused, allowing for:*

- a. Tracking of every cannabis plant, nutrient, watt, drop and yield within the Dispensary or its cultivation site
- b. Tracking of every cannabis plant from seed to sale
- c. Tracking of nutrients, schedules, yields, environmental variables and grow costs
- d. Capture of historical data and test results
- e. Provision of batch and plant tracking
- f. Creation of Commission approved dispatch and trip plans
- g. Tracking of shake, spillage, evaporation, edibles, concentrates and any theft

*The Site's will document each day's beginning inventory, acquisitions, harvests, sales, disbursements, disposal of unusable cannabis, and ending inventory by requiring its agents to input all such information into the Flowhub inventory control system on a daily basis. The Site's agents will also be required to input into the Flowhub inventory control system, on a daily basis, all information pertaining to:*

- a. Acquiring cannabis from another cultivation facility
- b. Acquiring cannabis from another dispensary or another dispensary's cultivation site
- c. Each batch of cannabis cultivated by the Dispensary's cultivation site
- d. Provision of cannabis to another dispensary
- e. Receiving cannabis infused edible products from another dispensary

### **2. Disposal of Unusable Cannabis (935 CMR 500.105)**

*The Company will establish and implement an inventory control system for the cannabis that documents the disposal of cannabis that is not usable cannabis. The Site's will require the use of the Cannabis Disposal Form attached as Exhibit G to document any such disposal, which will include the description of and reason for the cannabis being disposed of including, if applicable, the number of any failed or unusable plants; the date of disposal; the method of disposal; the name and registry identification number of the site agent responsible for the disposal. The Company will contract with one or more waste removal companies in compliance to (935 CMR 500.105 (L)) to provide the cultivation with an on-site waste refuse container, into which any responsible dispensary agent will deposit any cannabis that is not usable, as well as remove the contents of the on-site waste refuse container on a continuous basis and dispose of it as waste is customarily disposed of by waste removal companies.*

### **3. Designated Agent For Inventory Control**

*The Site(s) Operations Manager(s) will have oversight of, and maintain, their site's cannabis inventory control system.*

### **4. Methods of Acquiring Cannabis**

*The Dispensary will in general acquire cannabis from the Cultivation site, another dispensary or another dispensary's cultivation site. The Dispensary/Cultivation will not acquire cannabis from any other source.*

**Procedure:** *The Dispensary/Cultivation will follow the methods listed below in the event of any acquisition or provision of cannabis or related products:*

- a. Acquiring cannabis from another dispensary or another dispensary's cultivation site:

After approval by the Dispensary General Manager or Director of Operations, all such acquisitions will take place either within the Dispensary building by physical delivery from a dispensary agent of another dispensary, or outside the Dispensary building (including within the building of another dispensary or

another dispensary's cultivation site), if and only if, acquired by one of the Dispensary's dispensary agents and documented by a trip plan as required by the Commission's regulations. The Dispensary's General Manager or the Director of Operations will inspect and approve or reject all deliveries of cannabis into the Dispensary's building, whether from a dispensary agent of another dispensary or from the Dispensary's own dispensary agent bringing such acquisition into the Dispensary's building. The Dispensary will utilize its Flowhub inventory control system to document its acquisition of cannabis from a dispensary agent of another dispensary and will input all required information (see below) regarding such acquisition into the Flowhub system immediately upon receiving any cannabis into the Dispensary building and accepting such acquisition. The required information to be input by a dispensary agent upon any acquisition of cannabis from a dispensary agent of another dispensary will include:

1. A description of the cannabis acquired including the amount, strain, and batch number
2. The name and registry identification number of the dispensary and dispensary agent who provided the cannabis
3. The name and registry identification number of the dispensary agent receiving the cannabis on behalf of the dispensary
4. The date of acquisition.

b. Cannabis cultivated at the Cultivation site:

The Cultivation will utilize its Flowhub inventory control system to document its cultivation of cannabis at its cultivation site and will input all required information (see below) regarding such cultivation into the Flowhub system. The required information to be input by an agent pertaining to the cultivation of cannabis within the Cultivation site will include:

1. The batch number
2. Whether the batch originated from cannabis seeds or cuttings
3. The origin and strain of the cannabis seed or cutting planted
4. The number of cannabis seeds or cuttings planted
5. The date the cannabis seeds or cuttings were planted
6. A list of all chemical additives, including nonorganic pesticides, herbicides, and fertilizers used in the cultivation

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7. Harvest information including the date of harvest, the final processed usable cannabis yield weight, the name and registry identification number of the dispensary agent responsible for the harvest

8. The disposal of cannabis that is not usable cannabis including the description of and reason for the cannabis being disposed of including, if applicable, the number of any failed or unusable plants; the date of disposal; the method of disposal; the name and registry identification number of the dispensary agent responsible for the disposal

c. Provision of cannabis to another dispensary:

After approval by the Dispensary's General Manager or the Director of Operations, all such provisions will take place either within the Dispensary building by physical retrieval from a dispensary agent of another dispensary, or outside the Dispensary building (including within the building of another dispensary or another dispensary's cultivation site), if and only if, delivered by one of the Dispensary's dispensary agents, physically retrieved by a dispensary agent of another dispensary, and documented by a trip plan as required by the Department's regulations. The Dispensary's General Manager or the Director of Operations will inspect and approve all provision of cannabis to another dispensary. The Dispensary will utilize its Flowhub inventory control system to document its provision of cannabis to a dispensary agent of another dispensary and will input all required information (see below) regarding such provision into the Flowhub system immediately upon releasing any cannabis from the Dispensary building. The required information to be input by a dispensary agent upon any provision of cannabis to a dispensary agent of another dispensary will include:

1. The amount, strain, and batch number of cannabis provided
2. The name and registry identification number of the other dispensary
3. The name and registry identification number of the dispensary agent who received the cannabis on behalf of the other dispensary
4. The date the cannabis was provided
5. The cannabinoid profile of the cannabis within the package, including THC and other cannabinoid levels
6. **Symbol....TBD by March 15**

d. Receiving cannabis infused edible products from another dispensary:

After approval by the Dispensary's General Manager or the Director of Operations, all such acquisitions will take place either within the Dispensary building by physical delivery from a dispensary agent of another dispensary, or outside the Dispensary building (including within the building of another dispensary or another dispensary's cultivation site), if and only if, acquired by one of the Dispensary's agents and documented by a trip plan as required by the Commission's regulations. The Dispensary's General Manager or the Director of Operations will inspect and approve or reject all deliveries of cannabis infused edible products into the Dispensary's building, whether from an agent of another dispensary or from the Dispensary's own agent bringing such acquisition into the Dispensary's building. The Dispensary will utilize its Flowhub inventory control system to document its acquisition of cannabis infused edible products from an agent of another dispensary and will input all required information (see below) regarding such acquisition into the Flowhub system immediately upon receiving any cannabis infused edible products into the Dispensary building and accepting such acquisition. The required information to be input by an agent upon any acquisition of cannabis infused edible products from an agent of another dispensary will include:

1. A description of the edible food products received from the dispensary including total weight of each edible food product and estimated amount and batch number of the cannabis infused in each edible product
2. Total estimated amount and batch number of cannabis infused in the edible food products
3. The name and registry identification number of the dispensary and the dispensary employee providing the edible food products to the receiving dispensary and dispensary agent receiving the edible food products on behalf of the receiving dispensary
4. The date the edible food products were provided to the Dispensary

**5. Packaging/Storage (935 CMR 500.105 (K))**

*The Dispensary will package the great majority of its cannabis, and infuse and package all of its edibles, concentrates, at the cultivation site. After the opening of the Companies Cultivation site and on an ongoing basis, a large percentage of the Dispensary's cannabis will be packaged and stored in a safe room at the Companies Cultivation building in compliance to 935 CMR 500.110 (G)(I)(C)). With the exception of bulk packaged cannabis that will be transferred directly from the Companies Cultivation site to another dispensary or another dispensary's cultivation site, all usable cannabis cultivated at the Companies Cultivation site will be packaged and sealed in the exact amounts that it will be sold at the*

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*Dispensary's building (grams, fractions of ounces and full ounces). For the percentage of the Dispensary's cannabis that will be packaged at the Dispensary building, all such cannabis will be visually inspected and weighed in bulk by the General Manager to ensure the integrity of the cannabis in terms of strain, content, and amount. Thereafter, such cannabis will be broken down into smaller amounts (grams, fractions of ounces and ounces) and weighed to confirm weight accuracy. The cannabis will then be packaged and sealed into plastic bags of differing sizes that are transparent on one side, using a heat iron or packed into high-quality glass containers with a rubber air-tight seal around the circular opening of such glass containers. The cannabis will then be labeled with the required labeling information (see below). All handling of cannabis throughout the acquisition, inspection, weighing, packaging and labeling process will be done by the Dispensary's agents under strict cleanliness, security and sanitary controls as required by the Commission's regulations (105 CMR 300.000). All labels affixed to the Dispensary's packaged cannabis will be placed either on the outside of the plastic bags or the glass container. The information on all such labels will include:*

- a. For all cannabis provided by the Dispensary to another Dispensary, the Dispensary will ensure that such cannabis is labeled with:
  1. The Dispensary's registry identification number
  2. The amount, strain, and batch number of marijuana
  3. The date of harvest or sale
  4. A list of all chemical additives, including nonorganic pesticides, herbicides, and fertilizers, used in the cultivation and production of the Cannabis

### **6. Audits**

*The Site's Director of Operations will have oversight of the Companies inventory control and will conduct and document an audit of the companies inventory that is accounted for according to generally accepted accounting principles at least once every 30 calendar days. The Director of Operations will perform any audit by using reports generated from the Flowhub inventory control system that indicate the companies current inventory and comparing such reports to the individual site's actual physical inventory, which the Director of Operations will tally by physically counting the inventory and manually recording the totals. If a periodic inventory audit identifies a reduction in the amount of cannabis in the cultivation's inventory not due to documented causes, the Director of Operations will determine where the loss occurred and take and document corrective action using the Loss or Theft Report Form attached as Exhibit H. If any reduction in the amount of cannabis in the Site(s) inventory is due to suspected criminal activity by a dispensary agent, the Site(s) will report the dispensary agent to the Commission and to local law enforcement authorities and*

*take and document corrective action using the Loss or Theft Report Form attached as Exhibit H.*

## **7. Records Retention (935 CMR 500.105 (I))**

*The Company will maintain the inventory control documentation and records described above at the dispensary in compliance with the Document Retention Policy attached as Exhibit F for at least five years from the date on the inventory control document, and upon request, provide the required inventory control documentation to the Commission for review in either electronic or print format. The Companies inventory control documentation and records will include all categories of documents listed in Section II (Accounting and Financial Records) of the Document Retention Policy and will be stored both within the cultivation's electronic servers and the internet-based Flowhub inventory control system.*

## **G) General**

### **1. Posting of Required Information**

*The Company will post the following information in a place that can be viewed by the individuals entering any site:*

- 1. The Site's approval to operate;*
- 2. The Site's registration certificate;*

*The Director of Operations shall ensure that this posting is in place at all times during the Cultivation operating hours.*

### **2. Policy & Procedure Review**

*The Company will review its policies and procedures at least once every 12 months from the issue date of its Site's registration certificate and update as needed. The Company will ensure that all policies and procedures maintained for inspection are the most recent versions with all revisions incorporated therein. The Company will use the Policies and Procedures Review Log attached as Exhibit I, which will be kept in a binder containing all policies and procedures in hard copy, available for inspection in the reception area of the cultivation/dispensary buildings in order to ensure timely review of its policies and procedures.*

### **H) Cleaning and Sanitation**

#### **1. Maintenance of Dispensary/Cultivation Building and Equipment**

*The Cultivation will ensure that any building or equipment used by the Cultivation for the cultivation, harvest, preparation, packaging, storage, infusion, or sale of cannabis is maintained in a clean and sanitary condition. The Site's will maintain and enforce a routine cleaning schedule to ensure that the buildings and all equipment is maintained in a clean and sanitary condition.*

#### **2. Quality Control/Protection of Cannabis (935 CMR 500.000)**

*The Cultivation site will ensure that cannabis in the process of production, preparation, manufacture, packing, storage, sale, distribution, or transportation is protected from flies, dust, dirt, and all other contamination. In addition to the use of sealed containers, the Cultivation will routinely test samples of cannabis in its possession for any contaminates listed above in addition to THC and cannabinoid profiles. In the event any such contaminates are detected, the cannabis will be disposed of in accordance to the policies and procedures herein.*

#### **3. Removal of Refuse or Waste ( 500.105 (L))**

*The Company will ensure that refuse or waste products incident to the manufacture, preparation, packing, selling, distributing, or transportation of cannabis are removed from the buildings used at a site at least once every 24 hours or more often as necessary to maintain a clean condition. The Site's will develop and implement a plan for removal of refuse and waste approved by the Commission . The Site's will ensure that various agents will share the responsibility of removing refuse or waste each night before closing, and when necessary. Cannabis remnants or by-products shall be disposed of according to an approved plan and not placed within the facility's exterior refuse container.*

#### **4. Cleaning of Equipment**

*The Cultivation will ensure that all trucks, trays, buckets, other receptacles, platforms, racks, tables, shelves, knives, saws, cleavers, other utensils, or the machinery used in moving, handling, cutting, chopping, mixing, canning, packaging, or other processes are cleaned daily. The Cultivation will ensure that various agents will share the responsibility of cleaning equipment each night before closing, and when necessary.*

#### **5. Protection of Edibles**

*The cultivation/kitchen will ensure that, if applicable, all edible foods are securely covered. The cultivation/kitchen will ensure that all edibles are properly packaged and kept in a secure manner to prevent airborne or contact contamination. All edible products shall be prepared, handled, and stored in compliance to sanitation requirements in 105 CMR 500.000 and "Good Manufacturing Practices for Food", and with the requirements for food handlers specified in 105 CMR 300.000*

#### **6. Agent Hand Cleansing**

*The Cultivation will ensure that while in the Cultivation site, an agent will clean their hands and exposed portions of their arms in a hand washing sink:*

- 1. Before preparing cannabis including working with food, equipment, and utensils;*
- 2. During preparation, as often as necessary to remove soil and contamination and to prevent cross-contamination when changing tasks;*
- 3. After handling soiled equipment or utensils;*
- 4. After touching bare human body parts other than the dispensary employee's clean hands and exposed portions of arms; and*
- 5. After using the toilet room.*

#### **7. Agent Hygiene**

*The Site's will ensure that while in the site, if working directly with the preparation of cannabis or the infusion of cannabis into non-edible products, an agent employee will:*

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1. *Keep fingernails trimmed, filed, and maintained so that the edges and surfaces are cleanable;*
2. *Unless wearing intact gloves in good repair, not have fingernail polish or artificial fingernails on the agent's fingernails; and*
3. *Wear protective apparel such as coats, aprons, gowns, or gloves to prevent contamination.*

### **8. Dispensary Employee Clothing**

*The Cultivation will ensure that while in the Cultivation site, an agent will wear clean clothing appropriate to assigned tasks.*

### **9. Reporting of Adverse Health Conditions**

*The Company will ensure that while in any site, an agent will report to the Director of Operations any health condition experienced by the agent that may adversely affect the safety or quality of any cannabis with which the agent may come into contact. The Company will ensure that all agents receive appropriate training regarding reporting adverse health conditions that the policy regarding reporting is enforced.*

### **10. Determination of Adverse Health Condition**

*If the Director of Operations determines that an agent has a health condition that may adversely affect the safety or quality of the cannabis and, the Site(s) will prohibit the agent from direct contact with any cannabis or equipment or materials for processing cannabis until determined that the employee's health condition will not adversely affect the cannabis. The Company will ensure that all agents receive appropriate training regarding reporting adverse health conditions and that the policy regarding reporting is enforced.*

#### **I) Agent Registry Identification Card and Requirements**

##### **1. Possession of Agent Registry Identification Card**

*The Company will ensure that each site has the agent's registry identification card in the agent's immediate possession when the agent:*

1. *Is working at the any site, or*
2. *Is transporting cannabis for the Dispensary/Cultivation.*

**Procedure:** *No agent shall enter the Dispensary/Cultivation sites without first showing his/her agent registry identification card to the agent overseeing access and proving that he/she is in actual possession of the registry identification card. The Director of Operations will periodically check with agents within the Dispensary/Cultivation building to verify that agents have their registry identification cards in their immediate possession.*

## **2. Agent Accompaniment/Diversion**

*The Site's will ensure that an agent accompanies any individual other than another company agent associated with the Site's when the individual is present in the enclosed, locked facility where cannabis is cultivated or processed.*

**Procedure:** *Access to the Companies sites by individuals other than agents shall be supervised by the Director of Operations according to the following:*

- α. The Director of Operations must approve the entrance of any individual other than an authorized company agent into the Cultivation site.*
- β. Upon approval by the Director of Operations, an individual will be required to sign a logbook registering both the time in and the time out of the Cultivation site.*
- χ. The Director of Operations will assign an agent to accompany the individual at all times that the individual is within the site.*
- δ. The Director of Operations will ensure that upon exiting the Cultivation site, an accompanied individual will not have removed any cannabis or related products from the Cultivation site.*

## **3. Agent Registry Identification Card Requirement (500.030)**

*The Company will not allow an individual who does not possess an agent registry identification card issued under the appropriate Site(s) registration certificate to:*

1. *Serve as a principal officer or board member for the Company;*
2. *Be employed by the Company*

**Procedure:** *Prior to opening, the Company will ensure that all above-listed individuals have received an agent registry identification card. Any above-listed individual that does not obtain such a card will not be permitted to: be in the Dispensary building, cultivation*

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*site, extraction or kitchen, serve as a principal officer or board member for the Company, or be employed by the Company.*

#### **4. Notice of a Site's Agent Termination**

*The Company will provide written notice to the Commission, including the date of the event within ten working days after the date, when a site agent no longer:*

- 1. Serves as a principal officer or board member for the Company;*
- 2. Is employed by the Dispensary, cultivation, extraction or kitchen;*

***Procedure:*** *The Company will maintain an automatic notification system for renewals of registry identification cards and ensure that all renewals are achieved prior to the expiration of any registry identification card for any of the individuals listed above. In the event that a site's agent changes status as described above, the Company will ensure that the Commission is immediately notified and it shall be the responsibility of the Director of Operations to do so.*

#### **J) Physical Plant and Requirements of Dispensary and Cultivation Location**

##### **1. 1000 Feet From School ( Note: per federal guidelines)**

*The Dispensary and its cultivation site are (and will always be) located at least 1000 feet from a private school or a public school that existed before the date the Dispensary or Cultivation submitted its initial dispensary registration certificate application.*

##### **2. Parking**

*The Dispensary/Cultivation/Kitchen has onsite parking and parking adjacent to the Dispensary/Cultivation/Kitchen buildings.*

##### **3. Facility Amenities**

*The Dispensary and its Cultivation site have:*

1. *At least one toilet room;*
2. *Each toilet room shall contain:*
  - a. *A flushable toilet;*
  - b. *Mounted toilet tissue;*
  - c. *A sink with running water;*
  - d. *Soap contained in a dispenser; and*
  - e. *Disposable, single-use paper towels in a mounted dispenser or a mechanical air hand dryer;*
3. *At least one hand washing sink not located in a toilet room;*
4. *Designated storage areas for cannabis or materials used in direct contact with cannabis separate from storage areas for toxic or flammable materials; and*
5. *If preparation or packaging of medical marijuana is done in the building, a designated area for the preparation or packaging that:*
  - a. *Includes work space that can be sanitized, and*
  - b. *Is only used for the preparation or packaging of cannabis*

#### **4. Commercial Weighing Devices**

*For each commercial device used at the Dispensary/Cultivation site, it will:*

1. *Ensure that the commercial device is licensed and certified.*
2. *Maintain documentation of the commercial device's license or certification, and*
3. *Provide a copy of the commercial device's license or certification to the Commission for review upon request.*

#### **5. Maintenance of a Single, Secure Entrance**

*The Dispensary and Cultivation sites will have a single secure entrance. Through the use of a single, secure entrance into the site's building, the site's will implement appropriate security measures to deter and prevent the theft of cannabis and unauthorized entrance into areas containing cannabis.*

### 6. Prohibition Against On-Site Consumption

*The Company will not permit any person to consume cannabis on the property of the Site's. The Company will require that all employees sign a form stating that they understand the relevant policies and procedures and agree to abide by them, including the prohibition of consuming cannabis on the property of any site. The Site's will post signs inside the buildings and enforce the policy.*

### K) Security (935 CMR 500.110)

#### 1. Limited Access

*The Company will restrict access to the areas of the Dispensary/Cultivation site that contain cannabis and at the kitchen/extraction site, to authorized individuals only. No persons under the age of 21 are allowed into the body of the Cultivation, Dispensary, Kitchen, Extraction, not including the waiting room.*

**Procedure:** *Access to Cultivation, Dispensary, Kitchen, Extraction other than company agents shall be supervised by the Director of Operations according to the following:*

- ε. The Director of Operations must approve the entrance of any individual other than an authorized agent into any site.
  - φ. Upon approval by the Director of Operations, an individual will be required to sign a logbook registering both the time in and the time out of the site.
  - γ. The Director of Operations will assign an agent to accompany the individual at all times that the individual is within the site.
  - η. The Director of Operations will ensure that upon exiting the Cultivation site, an accompanied individual will not have removed any cannabis or related products from the site.
- a. Unauthorized Access

*To prevent unauthorized access to cannabis at the Companies buildings, the buildings have security equipment to deter and prevent unauthorized entrance into limited access areas that includes devices or a series of devices to detect unauthorized intrusion, which may include a signal system interconnected with a*

*radio frequency method, such as cellular, private radio signals, or other mechanical or electronic device. In addition, a burglar alarm shall be installed that will activate upon motion via entrance through the doors, glass, rooftop access and cover any shared wall. The alarm shall be monitored by an alarm company.*

b. Identification

*The Company will provide for the accurate and continuous identification of individuals authorized to enter the Site's.*

c. Security Equipment

*The Company has security equipment to deter and prevent unauthorized entrance into limited access areas that includes devices or a series of devices to detect unauthorized intrusion, which may include a signal system interconnected with a radio frequency method, such as cellular, private radio signals, or other mechanical or electronic device. In addition, a burglar alarm shall be installed that will activate upon motion via entrance through the doors, glass, rooftop access and cover any shared wall. The alarm shall be monitored by an alarm company.*

c.i. Intrusion Detection

*The Company will comply with all Commission and City rules and regulations with regard to mandatory security and monitoring devices to prevent and detect unauthorized intrusion into the cultivation/dispensary building. The Company will contract with a security and alarm monitoring company to conduct in-person and remote surveillance of the cultivation/dispensary buildings on a 24/7 basis. In addition, during business hours, the Operations Manager will ensure that all electronically restricted access controlled doors are properly secured and set to alarm as a result of any unauthorized intrusion. During non-business hours, the Director of Operations will ensure that the security system is armed and operational by securing all interior doors, electronically restricted access doors, and the exterior door and setting the security system by way of a confidential access code.*

c.ii. Exterior Lighting

*To prevent unauthorized access to cannabis at any location around or in the buildings, the Company has security equipment to deter and prevent*

*unauthorized entrance into limited access areas that includes exterior lighting to facilitate surveillance.*

**Procedure:** *At a minimum, the Site's shall maintain lighting to provide a minimum of 2-foot candles of light throughout all parking lots and the exterior entrance of the Dispensary/Cultivation building. The Director of Operations will ensure that all such lights are properly working at all times.*

c.iii. Electronic Monitoring

*The Company will conduct electronic monitoring both in and around its site. The Company will conduct electronic video monitoring of all visitors in the parking lot and in the entry area of the Building site.*

**Procedure:** *All customers entering the Cultivation shall remove their hats, sunglasses, and other similar objects, which obstruct physical identification. This shall not apply to clothing worn over the face for established religious reasons. At all times during business hours, at least one site agent within the site will be tasked with monitoring the electronic video monitoring systems and responding to any issues of security or safety that may arise. To prevent unauthorized access to cannabis at the site, the site has security equipment to deter and prevent unauthorized entrance into limited access areas that includes electronic video and visual monitoring, including but not limited to:*

1. At least one 19 inch or greater call-up monitor;
2. A video printer capable of immediately producing a clear still photo from any video camera image;
3. Video cameras that: (1) Provide coverage of all entrances to and exits from limited access areas and all entrances to and exits from the building, capable of identifying any activity occurring in or adjacent to the building; and (2) Have a recording resolution of least at 704 x 480 or the equivalent;
4. A video camera in each grow room capable of identifying any activity occurring within the grow room in low light conditions;
5. Storage of video recordings from the video cameras for at least 90 calendar days;
6. A failure notification system that provides an audible and visual notification of any failure in the electronic monitoring system; and

7. Sufficient battery backup for video cameras and recording equipment to support at least five minutes of recording in the event of a power outage.

*The Director of Operations will be responsible for ensuring that all electronic video and visual monitoring security equipment is properly functioning at all times.*

c.iv. Panic Buttons

*The Company will install and maintain working panic buttons in the interior of the Cultivation/Dispensary sites. All agents at the site will have access to and be made aware of the location of multiple panic buttons throughout the sites.*

***Procedure:*** *All Company employees will be trained on the specific location of panic buttons and the specific circumstances under which panic buttons should be used, including disorderly conduct, criminal invasion, and other security emergencies. The Director of Operations will ensure that all interior panic buttons are properly functioning at all times.*

d. Loitering

*The Company will provide for the accurate and continuous identification of individuals authorized to enter any site.*

***Procedure:*** *The Dispensary/Cultivation site's will periodically monitor the public areas around the building site to ensure no loitering is taking place and escort individuals away from the public areas around the buildings in the event that any loitering occurs.*

**2. Transportation (935 500.105 (M))**

*The Dispensary eventually plans to transport cannabis and cannabis infused edible products and oils between the Dispensary and the Dispensary's Cultivation site, as well as to deliver cannabis and cannabis infused edible products and oils to another dispensary and will follow the regulations detailed in 500.105(M).*

**a. Trip Plans**

*The Cultivation will ensure that company employees will be the only individuals permitted to transport cannabis, cannabis plants, and cannabis paraphernalia between the Dispensary and the Dispensary's Cultivation site or another dispensary.*

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*In all such instances, the Cultivation will complete a trip plan, compliant with the requirements below.*

### a.i. Contents

*If the cultivation and/or kitchen transports cannabis, cannabis plants, and cannabis paraphernalia as shown above, before transportation, the responsible agent will complete a trip plan that includes:*

1. The name of the agents (two required) in charge of transporting the *cannabis*;
2. The date and start time of the trip;
3. A description of the *cannabis*, *cannabis* plants, or *cannabis* paraphernalia being transported; and
4. The anticipated route of transportation

***Procedure:*** *The cultivation and/or kitchen/extraction will utilize the Trip Plan Form attached as Exhibit J that requests and requires entry of the data listed above. The Director of Operations designated dispensary agent will prepare a Trip Plan Form including each of the data items listed above. The Director of Operations or designated agent will retain one copy for filing with the cultivation and provide the second copy to the agent transporting any products.*

### a.ii. Agent responsibilities

*In addition to the responsibilities of an agent regarding the completion of the Trip Plan Form, the responsible agent will also enter the end time of the trip and any changes to the trip plan and provide a final copy of the trip plan to the Dispensary. The Dispensary will retain the final copy of the trip plan in electronic form at the Dispensary building. Any agent transporting cannabis will follow the procedures set forth below.*

***Procedure:*** *The cultivation and/or kitchen will retain the electronic copy of the trip plan filed prior to transportation at the Cultivation building. During transportation, the agent will in addition:*

1. *Carry a copy of the trip plan on the agent's person for the duration of the trip;*
2. *Use a vehicle without any cannabis identification;*
3. *Ensure that the dispensary agent has a means of communication with the Dispensary; and*
4. *Ensure that the cannabis, cannabis plants, or cannabis paraphernalia are not visible.*
5. *Ensure that all traffic laws are followed.*
6. *Ensure compliance with all other items on the Dispensaries internal transport checklist.*

a.iii. Record/ Retention

*The Dispensary/Cultivation sites will maintain all trip plans described above at the Dispensary/Cultivation sites in compliance with the Document Retention Policy attached as Exhibit F for at least five years from the date of the filing of the trip plan and, upon request, provide a copy of any trip plans to the Department for review. The Dispensary/Cultivation sites will maintain all trip plans in electronic form at the Dispensary building. The Director of Operations will be responsible for ensuring that trip plans are accounted for and accurate. The trip plans will be stored within the companies electronic servers.*