



Canna Select

Tier 1 Indoor Cannabis Production Establishment

- Indoor Cultivation
- Wholesale Delivery

23 LaSalle Drive, Whately, MA 01373

Contents

Leadership Team	3
Site Plan	9
Community Presence	11
Property Usage	13
Security Plan	15
Insurance	35
Odor reduction	36
Water Usage	40
Disposal Procedures	46
Transportation	52
Community Impact	63
Packaging and Labeling	65
Inventory tracking	66



Leadership TEAM

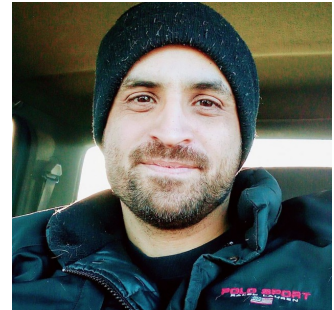
Neal A. Dach	◆	CEO
Bob Cimini	◆	CFO
Chris Cimini	◆	CFO

Neal Dach, Robert Cimini, and Chris Cimini are excited to work with John LaSalle to convert his flower cultivation center (LaSalle Florists) from a traditional floral farm into a licensed commercial cannabis cultivation establishment. CannaSelect is committed to producing top quality cannabis flowers and products with the help of LaSalle Florists' current staff of experienced professional cultivators.

Neal A. Dach

- Cannabis Cultivator
- Training and Development
- Environmental Conservation
- Compliance Administrator
- Veteran of Operation Iraqi Freedom

Neal Dach started his professional journey serving on the US Army Bomb Squad. During his time in service, Neal worked closely with other US Army Bomb Technicians to ensure the successful protection of the President, Vice President, and other foreign dignitaries against explosive attacks, responded to hundreds of incidents in Louisiana, West Texas, and the surrounding area, and deployed to combat during Operation Iraqi Freedom.



While studying Neuroscience at Harvard University, Neal fell in love with the medical potential for marijuana use to help combat veterans returning from overseas.

Cultivation of marijuana soon became Neal's passion as he dedicated his post-master's career to producing the premier quality cannabis flowers.

Neal is eagerly anticipating the opportunity to share his passion for marijuana through the safe distribution channels afforded by the State of Massachusetts.

Chris Cimini

- Financial Expert
- Certified Public Accountant
- Experienced CFO

Chris grew up in the Berkshires, attending St Joseph's Central High School where he graduated in 2001. Chris excelled in both school and sports at St. Joseph's. He was recruited to play lacrosse at Nazareth College, a top Division III school in Rochester where he played from 2002-2005. He was team captain and a 2-time All-American defenseman, earning those honors in 2004 and 2005. Nazareth contended in the D3 2004 National Championship game in Baltimore, MD. After college, Chris, a CPA, spent 11 years at a large regional CPA firm in Rochester, NY, most recently as a Senior Manager in the Audit/Advisory and Business Valuation groups. Chris moved to the private sector in 2016 and now serves as a Partner and Chief Financial Officer for one of the largest commercial real estate companies in Western NY, Buckingham Properties. As the CFO, Chris oversees all financial related matters for Buckingham's entire portfolio under management including financial reporting, cash flow management, bank dealings and acquisition/disposition strategies. He also manages the IT needs of the company and plays a key role in HR and long term strategic planning.

Robert Cimini

- Massachusetts Healthcare System Expert
- Permitting and Licensing
- Experienced CFO

Bob Cimini was born and raised in the Berkshires and currently resides in Hinsdale, MA. A long time Massachusetts resident, Bob and his wife, Peg Smith Cimini have raised three children in the Berkshires. Bob is also involved in many community activities and currently works in the Healthcare industry. Educated at Bentley College, he pursued an accounting degree and has held many financial executive positions in Berkshire County during his career and is currently working as a CFO for GEER Corporation.



Canna Select

Contact Information:

Neal A. Dach

Mobile: 909-496-8639

NealDach@gmail.com

Chris Cimini

Office: 585-287-5852

Mobile: 585-737-2119

ccimini@buckprop.com

Robert Cimini

Mobile: 413-281-2568

robocim3@msn.com

Address:

Mailing

23 LaSalle Drive,
South Deerfield, MA 01373

Physical

23 LaSalle Drive,
Whately, MA 01373

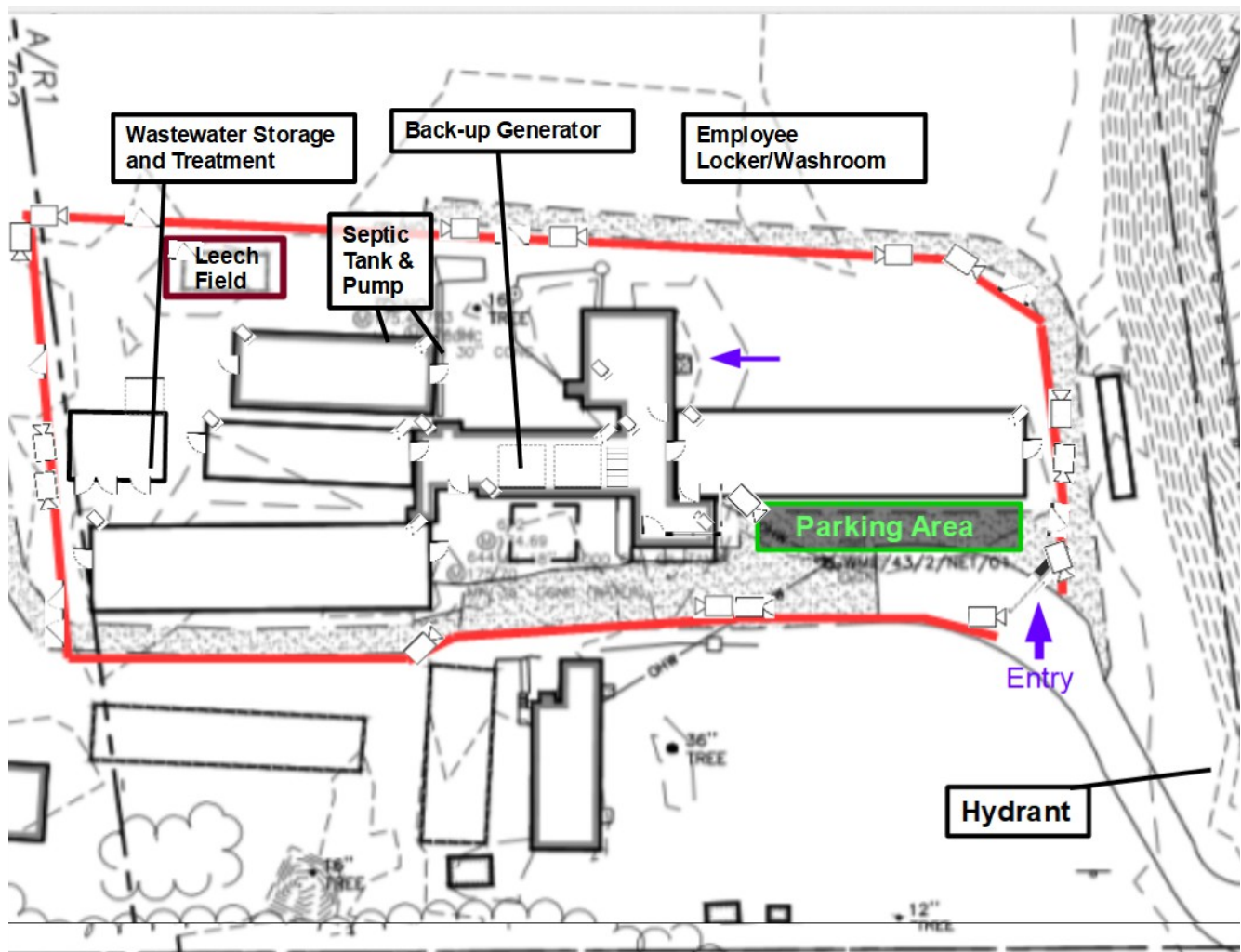
Operational Timeline

Operational Activities	Date
Formal Meeting with Whately Select Board	September 2020
Community Host Agreement	October 2020
Local Permit Approval	November 2020
File State License application	November 2020
Receive Provisional State License	September 2021
Install Security and other necessary components	Sept-Nov 2021
State License Awarded / Commence Grow Operation	January 2021
First Harvest	April 2022
First Sale	May 2022

Site Plan

Canna Select will begin operation as a tier 1 Cannabis Cultivation facility with a view to scaling up to larger tiers. Products will be produced and stored securely until delivery to retail marijuana establishments.

Note: The number and location of cameras are altered for security purposes.

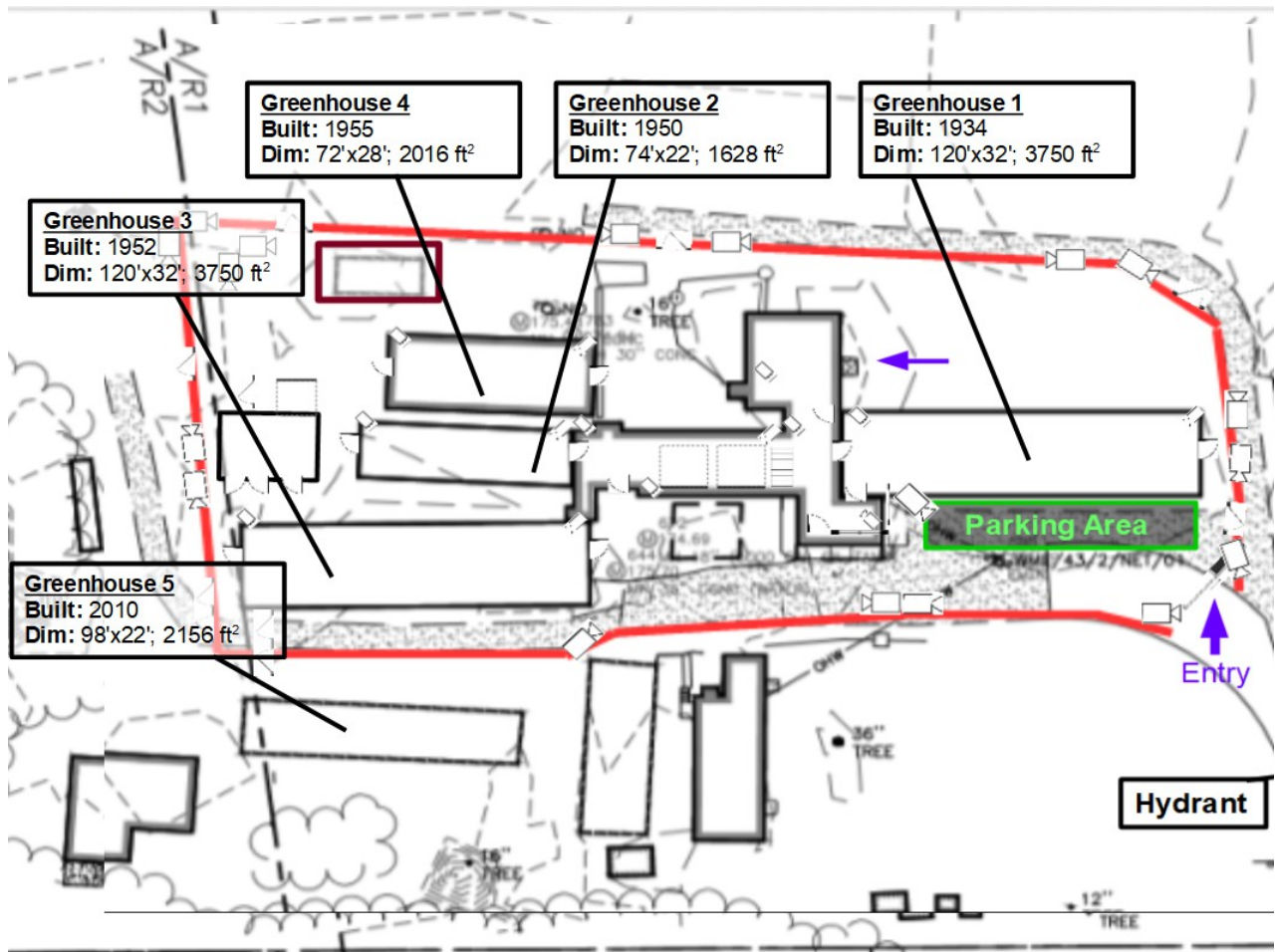


Greenhouse Overview

	<u>Year Built</u>	<u>Dimensions</u>	<u>Area</u>
Greenhouse 1	1934	120'x32'	3750 ft ²
Greenhouse 2	1950	74'x22'	1628 ft ²
Greenhouse 3	1952	120'x32'	3750 ft ²
Greenhouse 4	1955	72'x28'	2016 ft ²
Greenhouse 5	1995	98'x22'	2156 ft ²

Top: Satellite image of property to be used for business operations

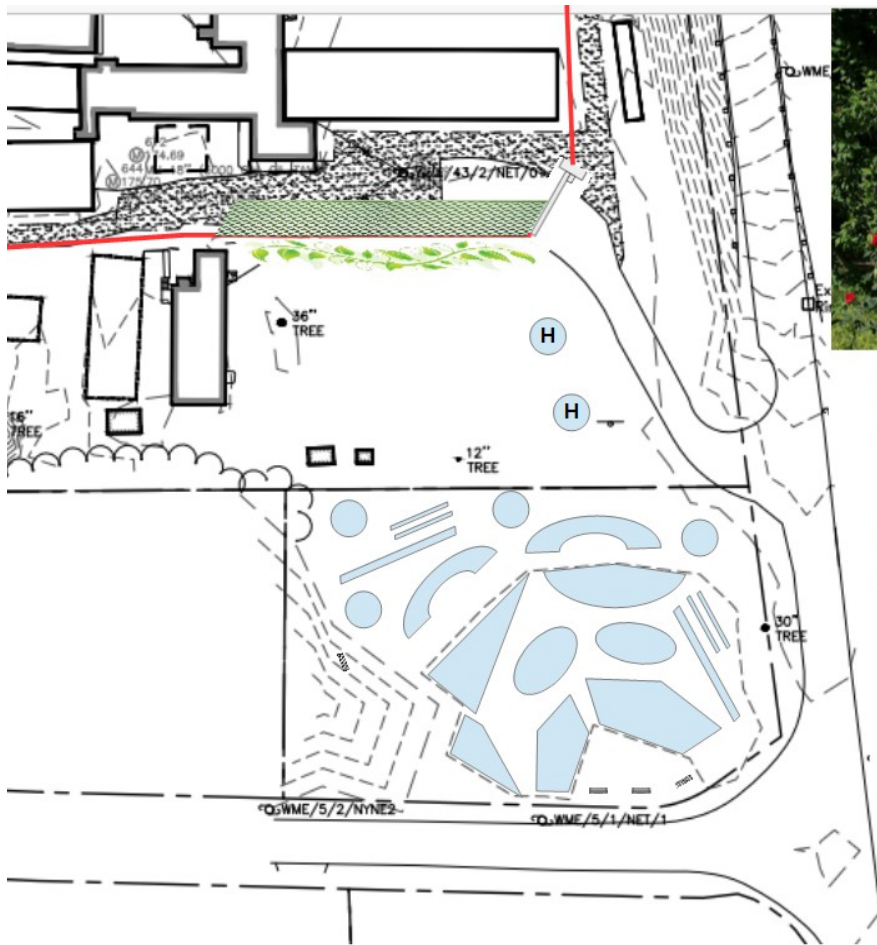
Bottom: Diagram of the relevant parts of the same property. The three greenhouses are labeled Propagation, Flower 1, and Flower 2. The area labeled as Processing will be used for drying, trimming, curing, and packaging, and storing cannabis flowers (bud). The building labeled as storage/waste will be used for storing equipment and cannabis waste (stems). The area labeled with a home icon will be used for security, admin, and employee locker rooms and shower areas.



Community Presence

Canna Select will present itself as a subdued, subtle presence in the community. Frontage will be adorned in a fashion that speaks of home and family. The security fence will be hidden by a lattice facade with fruiting and or flowering foliage. The flower field in the southeast corner of the property will be turned into a flower viewing area.

Canna Select will also take measures to limit light pollution. Security cameras covering external areas shall include cameras with the capability to function with minimum lighting at night. External lighting should be consistent with public safety requirements and hours of operation, reasonably shielded from abutting properties and designed to reduce light pollution. Internal lighting in greenhouses shall be fully screened from abutters after sunset.



Frontage Improvements

- White Lattice with foliage installed on south face of fence where visibility is high. Foliage will be arranged in a manner similar to what is depicted in the image above.
- The flower field on the southeast corner of the property (referred to as "the front field") will be crafted into a flower viewing area to be called LaSalle Park. LaSalle Park will include:
 - ✓ Park Benches
 - ✓ Several large flower displays represented by the blue shapes in the image (left)
 - ✓ Areas where flowers can be picked
 - ✓ Ongoing curation through the spring, summer and fall

Site Features

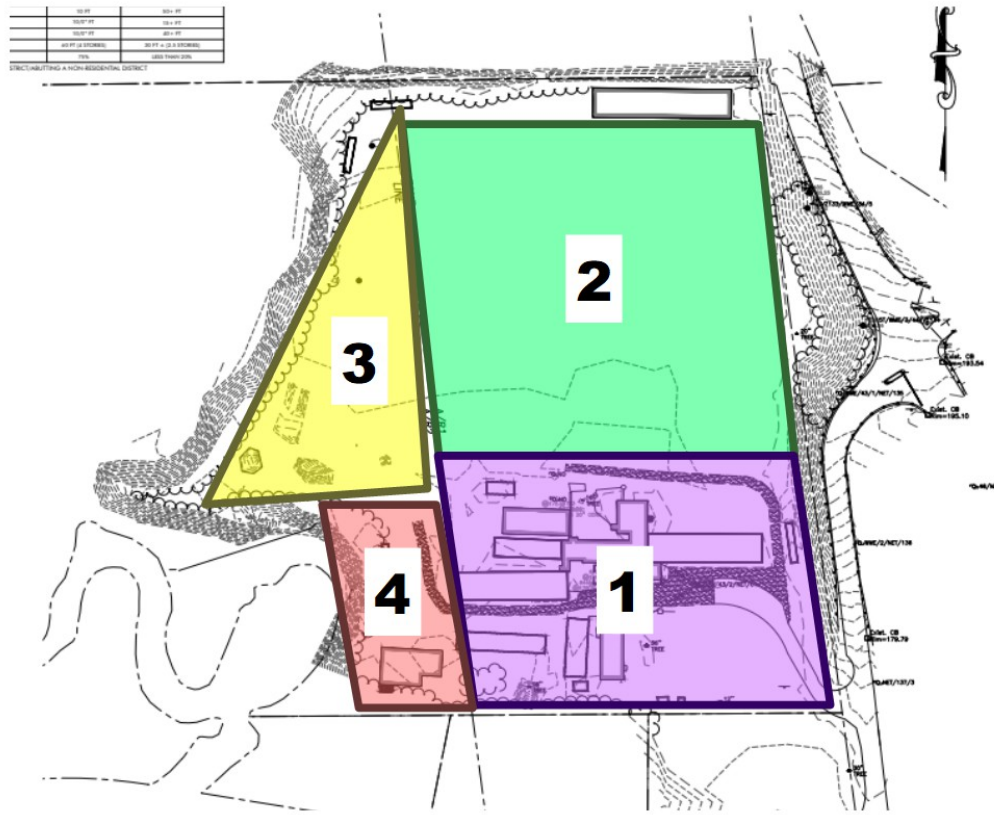
The property has a total area of 12 acres, 5 of which are developed. The majority of the field facing hwy 5 will remain as is and may be used to grow traditional farm crops such as flowers and produce. The back of the field near the treeline facing Mill River may be used for additional greenhouses and organic gardens.



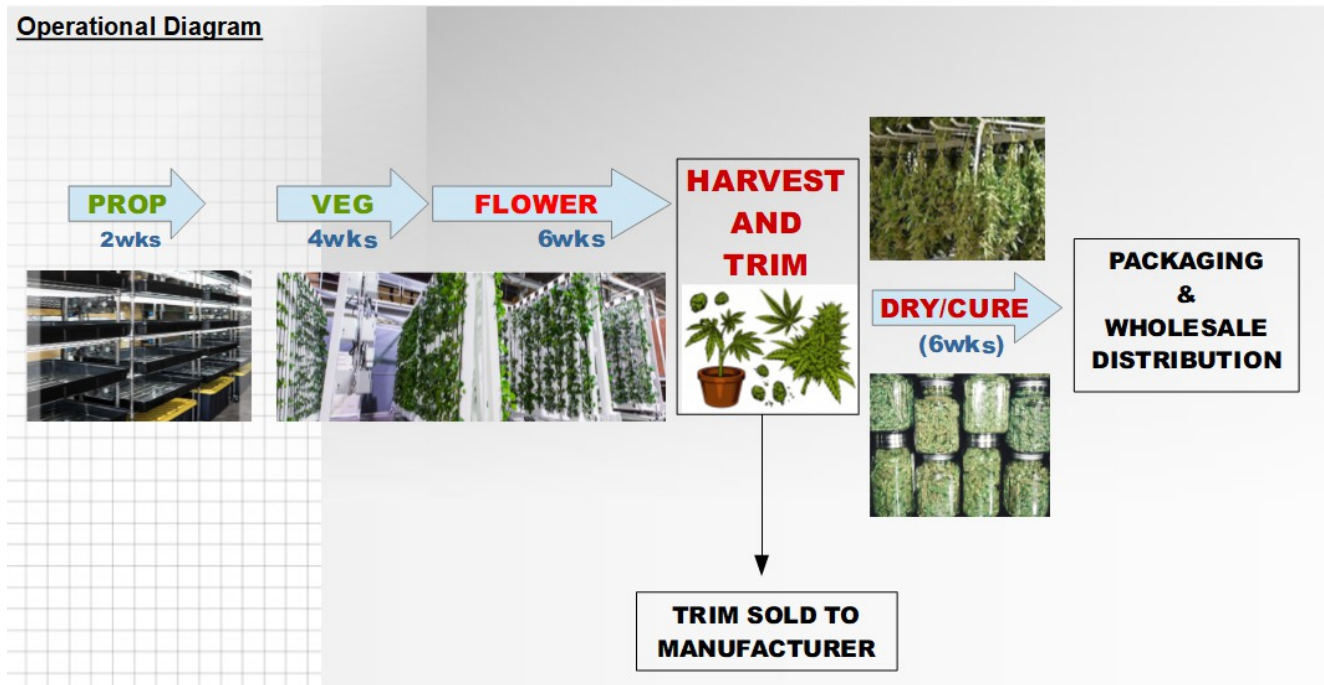
- ◆ Over 7,000 sqft of indoor space
 - Flower Shop
 - Apartment
 - House
 - Offices
 - Basement
- ◆ 10,000 sqft of heated greenhouse space
- ◆ 2 shallow wells
- ◆ City Water
 - Fire Suppression
 - Domestic Service
- ◆ Field Irrigation from Mill River
- ◆ 3 phase power available
- ◆ Natural Gas and Propane heating systems
- ◆ 3 bathrooms and 2 shower facilities
- ◆ 2 full kitchens (Employee Breakrooms)
- ◆ 2 Washer/Dryer hookups
- ◆ 2 Large storage facilities (Shed at north side of field and structure at southwest corner of the property)
 - May be used for equipment and other non-cannabis item storage
- ◆ 2 delivery vans
- ◆ Parking
 - 28'x133'; 3724 ft²
 - 10 Vehicle Capacity (two spaces reserved for delivery vehicles)

Usages: The Property Usage Map below is divided into 4 zones. Each zone will be used as follows:

- Zone 1: Indoor Cultivation, Administrative and Security offices, Inventory Vault, Delivery Preparation, Wasting and Disposal, and Product Packaging. Existing Structures only.
- Zone 2: Open field will be left as is. Traditional Crops may be grown.
- Zone 3: Expansion of Indoor Cultivation in new greenhouses, Outdoor Cultivation
- Zone 4: Equipment Storage

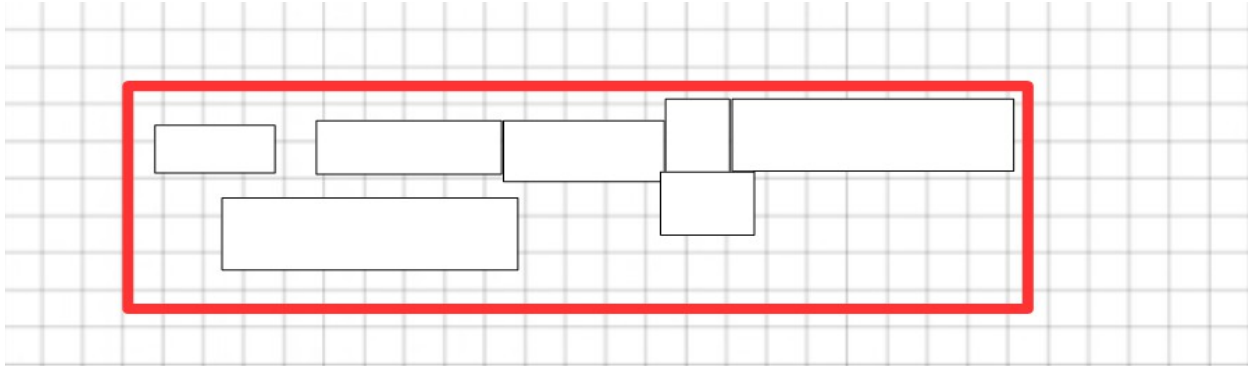


Operational Diagram



Plants grown from seeds and cuttings will spend two weeks in propagation trays until they form roots. Seedlings are then transported to vertical hydroponic towers where they spend 4 weeks in vegetative growth and then 6 weeks flowering. Once flowering is complete, plants are harvested and then hung to dry for two weeks. Fully dried plants are then trimmed and separated into three piles, bud, leaves and shake (tiny pieces of bud that broke off from the flower mass), and stems (waste). The whole bud is cured in large plastic bins and mason jars for 4 weeks and then packaged for wholesale distribution. The leaves and shake, together referred to as trimmings, will be sold and delivered to a manufacturer.

Security



Security at Canna Select will include the following features in compliance with Massachusetts state regulations 935 CMR 500.000 et. seq. and 935 CMR 500.110.

Security measures will include:

- ◆ Perimeter Fencing
- ◆ Closed Circuit Television System (CCTV)
- ◆ Access Control and Monitoring System
- ◆ Security Alarm System
- ◆ Redundant (Backup) Security Alarm System
- ◆ Security Room/Dispatch
- ◆ Partnership with Whately Police Department

Security Plan

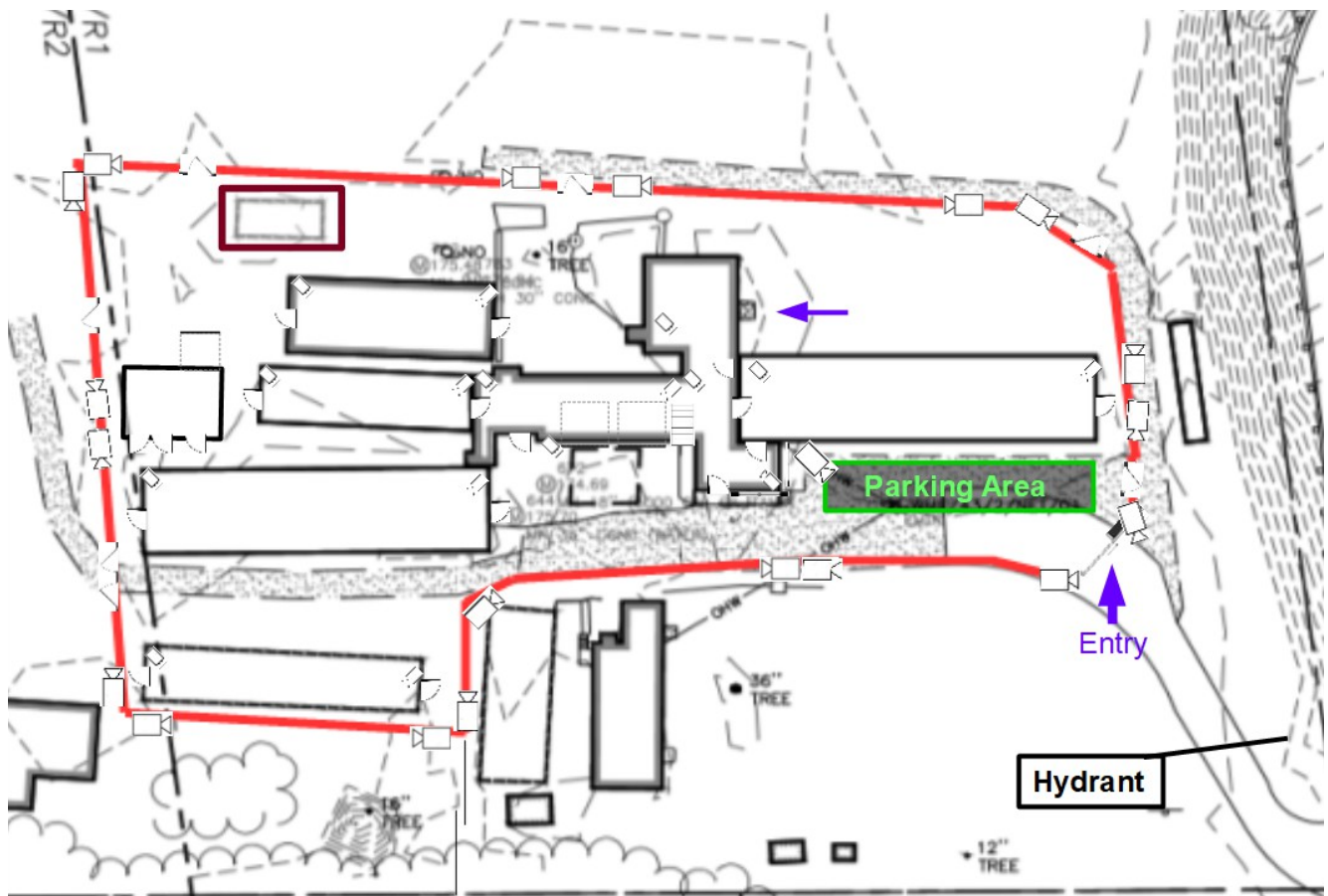
Security cameras will be positioned along a 6' chain-link perimeter fence and inside spaces so as to eliminate blindspots. Vehicular access will be restricted to one entry and exit point, as will personnel. A security plan proposal will be completed with the help of a licensed security company that specializes in assisting Massachusetts cannabis businesses and then will be approved by the state before installation.

All Canna Select employees will be at least 21 years old and will be required to pass background checks as mandated by 935 CMR 500.105(14) (see also 935 500.110(4)(e)). Vendors, contractors, and other visitors will be at least 21 and will be required to present state identification proving such before being allowed on premises.

All entrances to the premises will be secured with electromagnetic high security locks which require card access. Only managerial staff and Canna Select security personnel will carry access cards. Other staff members will be signed in by Canna Select security. Limited access areas, where cannabis is cultivated and where cannabis products are processed and stored, will be accessible only to specifically authorized essential personnel (935 CMR 500.110(4)).

Disposal of cannabis waste will be done in a secure fashion in accordance with 935 CMR 500.105(12). The outside perimeter of the cultivation center will be monitored by CCTV and will be sufficiently lit to facilitate surveillance. The facility will be secured with a perimeter security fence with a privacy screen and adequate signage in accordance with 935 CMR 500.110(4) (Area: 12'x12' min.; Lettering: 1' min.; Text: "DO NOT ENTER – LIMITED ACCESS AREA – ACCESS LIMITED TO AUTHORIZED PERSONNEL ONLY"). Trees, bushes, and other foliage outside the facility will be removed or maintained to ensure they do not allow for a person or persons to conceal themselves from sight. During hours of operation, security agents will randomly patrol the perimeter of the facility to provide a physical deterrent as well as monitor the fence line and parking area for suspicious activity.

Each entry and exit point to the Canna Select Cultivation Center will be controlled by the ACMS and monitored by CCTV. All fire/emergency egresses will be outfitted with audio alarms that transmit to the security room. Entrances and exits to the facility and to limited access areas within the facility will be monitored and controlled by electronic security systems and security agents. Employees, contractors, vendors, and other authorized visitors will be granted access to the facility by a security agent.



- | | | | |
|---|------------------------|---|---------------------------|
|  | Fencing |  | Security Camera (outdoor) |
|  | Door |  | Security Camera (indoor) |
|  | Window |  | Gate (personnel) |
|  | Garage Door |  | Gate (vehicle) |
|  | Stairs to Second Level | | |

All marijuana products will be kept out of plain sight of individuals on the premises and will not be visible from outside the facility. All finished marijuana products will be stored in a well maintained secure inventory vault only accessible with fingerprint verification from top Canna Select Officials. The Canna Select security plan will be shared with local police and fire officials and updated as necessary. In the event of diversion, theft, or loss of marijuana, police will be notified immediately, all products will be secured, and an assessment will be made to determine if additional safeguards are necessary.

The Canna Select Cultivation Center will be equipped with Closed Circuit Television System (CCTV), Access Control and Monitoring Systems (ACMS), and primary and secondary Security Alarm Systems (SAS) installed by a licensed commercial security system contractor. Access to rooms containing surveillance, monitoring, recording, and data storage equipment will be limited to essential Canna Select personnel, law enforcement authorities, security system service personnel, and Cannabis Control

Commission officials. A list of authorized employees and service personnel will be kept up to date, posted in a dedicated security room, and made available to the Cannabis Control Commission upon request. All personnel will sign in and out of a Security Access Log upon entering and exiting the security room.

Records

All required records, lists, and logs will be retained in compliance with Cannabis Control Commission regulations. Computer log files will be retained for at least 90 days. The video monitoring system will provide a minimum of 90 days of surveillance video storage on site. Video surveillance documenting a security event will be retained indefinitely.

Power Back-Up

All security and emergency system components of the facility will be supported by battery back-up. In the event of power outage or failure, a notification system with audio/visual. In the event of a power outage or failure, a notification system will alert designated Canna Select respondents. In the event of an extended power outage, a gas generator will be used to keep all security equipment active.

Security Audits

Canna Select will, on an annual basis, obtain a security system audit by a vendor approved by the Cannabis Control Commission. A report of this audit will be submitted in a form and manner determined by the commission no later than 30 days after the audit is conducted. The report will also be made available to the Whately Board of Selectmen as well as the Whately Police Department. If the audit identifies concerns about the facility's security system, Canna Select will submit a plan of correction within 10 business days.

Limited Access Areas

Limited Access Areas will be controlled by electronic card access security locks and will be accessible by credentialed users only. All Limited Access Areas will be identified by signage in accordance with 935 CMR 500.110(4). A description of all Limited Access Areas detailing entrances, exits, walls, partitions, storage, and disposal loci will be submitted to the Cannabis Control Commission.

Personnel and Visitor Access

All persons entering and exiting the Canna Select Cultivation Center will sign in and out of a site entrance log. Access will only be granted by a security agent after the individual is confirmed to be 21 years of age or older, an active employee, an authorized contractor, vendor, or an authorized visitor. Individuals must remain in the check-in area until their identification, reason of business, authorizing credentials are verified by Canna Select management. Individuals not able to complete the check-in process will not be allowed to remain and will be escorted off the premises by security. Outside vendors, contractors, and other visitors must obtain a visitor identification badge prior to entering Limited Access Areas, will sign into a Visitor Log, and will be escorted at all times by an authorized Canna Select agent. Visitor ID Badges will be kept visible at all times and then returned to the establishment upon exit and the Visitor Log will be available for inspection by the Cannabis Control Commission upon request.

Perimeter Security and Access Points

The entire outside perimeter of the facility will be monitored by CCTV and will be sufficiently lit to facilitate surveillance. Each entry and exit point will be controlled by the ACMS and monitored by the CCTV system. All doors utilized as fire/emergency egresses will have audio alarms that transmit to the Security Room. All emergency and secondary entry and exit doors to the facility will be equipped with rim mounted panic bar hardware. All activity related to entry and exit doors and limited access area doors will be monitored and controlled by the electronic security system and security agents. Facility entry/exit doors and doors leading to limited access areas will be equipped with alarm activating high security magnetic locks which are unlocked with thumbprint reader electrified strikes. Safety lighting that does not cause interference with the CCTV system will be installed throughout the interior and exterior of the building.

Closed Circuit Television System (CCTV)

The CCTV system will comply with all requirements outlined in 935 CMR 500.110. Video cameras will monitor all areas where marijuana is prepared, stored, handled or dispensed, areas that contain cannabis plants, products, byproducts, and waste, the inventory vault, all points of entry and exit, and the parking area. Cameras will be angled so as to allow for the capture of clear and certain identification of any person entering the facility or limited access areas and all video cameras will record twenty-four hours a day.

The CCTV system will use a comprehensive enterprise level Video Monitoring System comprised of a server-based Network Video Recorder. The Video Monitoring System (VMS) will ensure that the camera images will be available for immediate viewing by the Cannabis Control Commission upon request and recordings will be retained for at least 90 calendar days. In the event Canna Select staff become aware of pending criminal, civil, administrative investigation, or other legal proceeding for which the recording may contain relevant information, recordings will not be altered or destroyed and will be retained as long as necessary.

Video Monitoring System

The VMS will be capable of producing clear, color still photos and videos (live or recorded) with the date and time stamped on and synchronized across all recordings so as not to obscure the images. VMS images will be available in industry standard image formats (i.e. .jpg, .bmp, .gif). Exported VMS images and video will be archived in a proprietary format that ensures authentication of the video and guarantees that no alteration of the recorded image has taken place. Exported video will have the

The CCTV System Enables

- Protection of
 - Personnel
 - Deliveries
 - Property and products
- Monitoring of
 - Building Perimeter
 - Entrances and Exits
 - Lobbies and Corridors
 - Receiving bays
 - Storage areas
- Verification of
 - Alarm System
 - Security System
- Investigation of
 - Criminal Activity
 - Disciplinary Activity

CCTV Video Monitoring System Capabilities

- Displays a date and time stamp on all recorded video
- Produces a digital video disk using an installed media recording drive that provides video viewable on any Windows PC
- Remains operational during a power outage
- Exporting of still images in standard format
- Archive of exported videos (Video Authentication)
- Save video in industry standard formats
- Allows recordings to be erased or destroyed prior to disposal

ability to be saved in an industry standard file format that can be played on a standard computer operating system. All recordings will be erased or destroyed prior to disposal. The VMS will be continuously and remotely accessible to authorized members of the Canna Select and local law enforcement via the internet. Authorized users will be able to access the VMS via (i) a Windows computer and remote client software installed, (ii) a web browser, or (iii) a mobile smart device including tablets and smartphones with remote client software installed.

Third Party Monitoring

Canna Select will contract with a licensed security vendor to help deter, detect, and document security events at the facility from a remote location. Vendor will monitor for fire and for security breach of doors or windows. Trained professionals from their monitoring centers will be able to access our security surveillance system at all times and will report and document any suspicious activity. Our internal security personnel will work with vendor to establish guidelines for what entails suspicious activity and to ensure regulatory compliance.

NVR System and Security System Integration

The Network Video Recorder (NVR) system will be located on vertical racks in the security room (935 CMR 500.110(5)(d)), will record video signals from Network IP cameras that are connected to a dedicated LAN for the CCTV system, and will allow for video surveillance at the PC-based workstation located in the security room. The security workstation will have one or more large format monitor(s) and desktop monitors of at least 20 inches or greater to monitor cameras and access the Video Monitoring System. A local high definition color printer will be maintained and used to print hard copies of stored images when needed. The VMS will record at full resolution of the Network IP cameras 24 hours a day, 7 days a week. The VMS will record passively at 1 frame per second and at 10 frames per second when movement is sensed and will be able to store a minimum of 90 days of continuous recordings from all cameras on-site on the NVR. The VMS will be integrated with the Access Control & Monitoring System (ACMS).

Network IP Cameras and Camera Placement

The CCTV system will utilize fixed 3.0-megapixel Network IP (or similar) dome cameras with day/night and wide dynamic range technology. Fixed cameras will be positioned to provide consistent unobstructed recorded images of all required areas and will be angled to provide video footage high quality face and body images allowing facial recognition of any person entering or exiting the facility or premises. Canna Select will use Day/Night (D/N) and Wide Dynamic Range (WDR) capable, 0.3 lux (max) cameras to view all building entrances, the parking area, all areas inside the facility, the entire perimeter, and areas immediately adjacent to the premises.

System Backup, Testing, and Maintenance

The CCTV system, NVR, and LAN switches will have battery backups to remain operational during a power outage. Canna Select personnel will routinely (at least once a week) inspect and test the CCTV and VMS systems to ensure they are in good working order. Malfunctions discovered by Canna Select staff will immediately be reported to the Operations Manager or designee and corrective actions will be taken promptly.

An archiving process will be implemented on a daily basis to ensure proper backup and storage of surveillance video footage. The CCTV system and its components will be under a 24/7 maintenance agreement with a Licensed Commercial Security System contractor that will include monthly security system testing.

Access Control and Monitoring System (ACMS)

A network based, distributed database electronic access control and monitoring system will be installed at the facility to serve to integrate electronic security systems. The ACMS will be comprised of controllers, smart card readers, and smart cards that are connected to a communications server and then connected to a PC-based workstation on the dedicated security LAN. The ACMS will be cross connected with the security alarm system (SAS) so that redundant communications with the central station that is listed by Underwriters Laboratories (UL) for alarm monitoring will take place automatically.

An enterprise level system with Linux operating system, the ACMS combines point monitoring and access control with photo ID badging, network video recorder integration, alarm, and email/text message notification and threat level escalation. TCP/IP network communications provide user interaction and real-time monitoring to PC

Access Control and Monitoring System (ACMS)

- Supports crime prevention and control objectives
- Supports criminal and disciplinary investigation
- Ensure a secure, locked facility
- Prevent theft and diversion
- Grant credential based access
- Access request monitoring and documentation
- Alarm condition monitoring and alerts
- Utilizes access cards that are difficult to duplicate
- High level integrated functionality of whole system

workstations connected to the security LAN. This system will integrate with the CCTV system and Network Video Recorders (NVRs) and allow NVR stored and live video recordings to be accessed within the access control software. All video will be transmitted across the security LAN connections. The ACMS will be monitored for malfunctions using four stage notifications that can provide audio, text, and/or visual notifications of any failure in the system including alarm, trouble, ground, or open indications.

User groups will be configured within the ACMS to dictate what users will be granted access to specific locations and at what times. Advanced access control features such as threat escalation and Mantrap door control will be implemented as follows:

1. Threat Escalation – the ACMS will be programmed to update access control user groups and definitions real-time in the event of an alarm condition to further restrict or allow movement in the facility.
2. The entrance interior door to Limited Access Areas cannot be unlocked and opened until the opposite door has been closed and locked.

3. Pass-through authorization is validated by smart card through the ACMS.

The ACMS will have a battery backup to remain operational during a power outage. Doors and locks to restricted areas and Limited Access Areas will be configured to remain locked during a power outage unless required under fire/life safety standards. The operations manager or designee will ensure that routine inspections and tests are performed at regular intervals (once a week) to ensure that the ACMS stays in good working order. The ACMS and its components will be under a 24/7 maintenance agreement that will include monthly testing of all security devices by a licensed security contractor.

Contactless Smart Card Readers and Employee Smart Card Credentials

Select interior and all exterior pedestrian doors will have contactless smart card readers to allow authorized personnel to access the facility and Limited Access Areas. Doors equipped with smart card readers will unlock upon presentation of an issued, credentialed, and activated contactless smart card if the individual is authorized at that location and time. These readers will be equipped with multi-layered security that ensures data authenticity and privacy and will provide tamper-proof protection of keys/cryptographic operations. They will be operational at temperatures ranging from -31 to 150 degrees Fahrenheit and will have an environmental rating of IP65, allowing them to be surface mounted inside or outside. Higher security areas will have a combination contactless smart card reader and a keypad for a level two identification and authentication requiring an individual to present a credential and a Personal Identification Number. All Canna Select Agents will be issued a contactless smart card. The HID iClass smart card will be attached to a neck lanyard with a clear plastic envelope that will also contain the Canna Select Agent's ID card and will be worn and plainly visible at all times while on site.

Visitor Management

There will be a visitor log located at the reception desk. When a visitor or contractor arrives, they will be required to present a valid photo ID to Canna Select management for verification the visitor's identity and authorization. A Visitor Identification Badge will be issued. The visitor's information will be logged into the Visitor Log including the following data:

- I. Name
- II. Time of Arrival
- III. Time of departure
- IV. Reason for Visit
- V. Escorting Agents
- VI. Verification that a valid ID was presented

The visitor log will be available for inspection by the Cannabis Control Commission and the visitor's ID badge will be collected upon exit.

Security Alarm System (SAS)

The ACMS will include an intruder alert system and has a robust alarm monitoring capability including point monitoring and alarm email/text notifications. The security alarm system will be comprised of an alarm system control panel, zone expanders, alarm keypads, door contacts, motion sensors, glass break sensors, and panic/hold up alarms.

The Canna Select security alarm system design will meet the requirements outlined in 935 CMR 500.110 including, but not limited to:

- (a) A perimeter alarm on all entry and exit points and perimeter windows
- (b) A failure notification system that
 - i. provides an audible, text, or visual notification of any failure in the surveillance system
 - ii. Alerts designated employees within five minutes of failure by phone, text or email
- (c) A duress alarm, panic alarm, or hold-up alarm connected to local public safety or law enforcement authorities

The SAS will provide coverage of all entry points and perimeter windows in the facility and all rooms with exterior walls. Exterior doors and select interior doors will have recessed magnetic door contacts installed to monitor the security of these doors. All doors that have access control readers and magnetic contacts will be equipped with specialized motion detectors, referred to as request-to-exit (REX) devices. The top surface mounted REX device will shunt the magnetic contacts, allowing valid egress. The ACMS system will be programmed to allow a maximum duration for valid egress without causing a held open alarm.

Every room with an exterior door, exterior wall, the inventory vault, and interior corridors will have motion detectors installed to monitor the security of these areas. These motion detectors will have sensor data fusion technology which uses a sophisticated software algorithm to gather signals from five sensors, two pyroelectric sensors, a range adaptive radar sensor, a room temperature sensor, and a white light level sensor. The onboard microprocessor analyzes and compares the sensor data to make the intelligent alarm decisions. Detector design will include Multi-point Anti-mask with integrated spray (MANTIS) detection which uses patented prism lenses and active infrared to detect objects covering or placed in front of it. MANTIS detectors are sensitive to materials regardless of texture or color, including fabric, paper, metal, plastic, tape, and spray. When a MANTIS detector identifies a masking material, the detector sends a supervision anti-masking signal to the control panel. Cover and wall tamper switches are included in this surface mounted detector.

Security Alarm System control panel and alarm keypad

The SAS control panel will be connected to the ACMS and be programmed so that redundant communications with a UL listed remote central station takes place automatically. The SAS will

provide authorized users with the ability to receive alerts from the control panel on their mobile devices and email including Arm/Disarm changes and alarm activations.

In addition to the primary alarm, Canna Select will have a redundant secondary SAS installed by a different security company. This backup alarm will have all the capabilities of the primary system. When an alarm is triggered, redundant signals will go out to each separate monitoring company. The primary monitoring company will notify the Whately Police Department of the alarm and the backup monitoring company will notify Canna Select Operations Manager or designee.

The facility will have an alarm keypad installed to allow authorized arming, disarming, and reporting. The LCD display alarm keypad will include easy-to-use icons, menus, and distinct tones. A silent duress alarm will be sent to the central station if a duress code is entered into the alarm keypad by an individual if they are forced to disarm this system.

Security Alarm System Panic and Holdup Alarms and SAS testing and maintenance

Canna Select will utilize wired Panic and Holdup buttons that are installed in convenient locations on the wall in the Inventory Vault, Security Room, and each Cultivation Room. The Panic alarm will be an audible security alarm signal generated by manual activation of the Panic button and is intended to signal a life threatening or emergency situation requiring law enforcement response. The Holdup alarm will be a silent alarm signal generated by the manual activation of a holdup button and is intended to signal a robbery in progress.

The SAS and all of its components will have a battery backup to remain operational during a power outage and a well maintained backup generator will be onsite and used when an outage lasts more than 2 hours. The Operations Manager or designee will ensure that routine inspections and tests at regular intervals (at least once a week) of the SAS are performed to ensure good working order. The SAS and its components will be under a 24-hour a day, 7 days a week maintenance agreement that will include monthly testing of all security devices.

Power Backups

In the event of a power outage, a solar panel charged 12-volt battery backup system will provide power to the facility. When a power interruption is detected, the SAS will automatically send a text and email message to the on-call emergency response team member. The power interruption will be investigated by the emergency response team member and they will ensure that all security systems remain operational.

In preparation for events of extended power outage, Canna Select will keep a commercial gas-powered generator onsite. After 2 hours of continuous outage, the emergency response team member will activate the generator to recharge the multi 12-volt battery system. In the event of a catastrophic power failure (one that lasts for more than 24 hours), the Canna Select Management Team will schedule and maintain manned security at the facility 24 hours a day.

Inventory Vault

Canna Select will have a secure vault designed and built into the designated space. The vault will be constructed of advanced building materials that may include steel reinforced concrete block, steel

plates, steel security mesh with cement board or other materials approved by the Cannabis Control Commission.

This vault will be used to store all finished marijuana and marijuana products during business and non-business hours. The door of the inventory vault will be made of reinforced steel with a reinforced steel frame along with a fish-eye door scope viewer (peep hole) installed so that before exiting the vault, the exterior of the vault can be viewed from inside.

The interior and exterior of the vault will be under CCTV monitoring and access to the vault will require RFID card access and pin pad code. The vault will have a hardwired panic alarm installed inside.

The Inventory Vault will be the primary location for all finished Marijuana Products and the Waste Bin. Canna Select Agents will be required to enter the Inventory Vault in pairs. No Canna Select Agent will be authorized to enter the Inventory Vault by themselves. Canna Select Agent access to the Inventory Vault will always be restricted to as few agents as deemed necessary for the efficient performance of site activities. A Vault Access List containing the names of Canna Select Agents will be posted on the Vault door at all times.

Security Personnel

The Canna Select Cultivation Establishment will be protected by unarmed security agents provided by a third-party licensed security contractor. All members of Canna Select management will receive unarmed security personnel training. At least one security agent will be on site at all times the facility is open. Security Agents will manage the security room, visitor log, and monitor the CCTV and ACMS systems. Security agents will conduct video surveillance of the interior and exterior of the facility and regularly patrol the entire property (hourly patrols).

Transport and Delivery

Prior to any transportation of marijuana or marijuana products, all inventory marked for shipment must be linked to the Canna Select seed-to-sale tracking program in METRC. Prior to leaving the facility, Canna Select agents must weigh, inventory, and account for all marijuana products to be transported. Weighing, cataloging, and accounting of marijuana products will take place before outgoing shipments and after incoming receipts and will be video recorded. Video recordings will show each product being weighed, the weight reading on the scale, and the cataloging of products on the manifest. Weight and inventory tracking data will be required on all incoming marijuana product receipts.

Canna Select will only transport marijuana products to and from other licensed Marijuana Establishments by registered Marijuana Transport Agents on staff. Marijuana Transport Vehicles will be staffed by at least two agents. At least one agent will remain with the vehicle at all times that the vehicle contains marijuana or marijuana products. Marijuana products will be packaged in sealed, labeled, and tamper or child resistant packaging prior to and during transport.

In case of an emergency stop during the transport of marijuana products, a log must be maintained describing the reason for the stop, the duration, the location, and any activities of personnel exiting the vehicle. All transportation times and routes will be randomized to avoid any patterns in the days of the week, times of day, and routes traveled. All transport routes will remain within the border of the Commonwealth of Massachusetts.

All vehicles and transportation equipment used in the transport of cannabis products or edibles requiring temperature control for safety must be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent cannabis products or edibles from becoming unsafe during transport consistent with applicable requirements pursuant to 21 CFR 1.908(c). Canna Select will not transport any marijuana product that is considered Temperature Control for Safety (TCS) food or that requires a mechanically refrigerated cold storage compartment or container.

When transporting marijuana products, no other products may be transported or stored in the same vehicle. No firearms may be located within the vehicle or on a Canna Select Agent. Canna Select Agents will document and report any unusual discrepancy in weight or inventory to the Cannabis Control Commission and law enforcement authorities not more than 24 hours after discovery. Canna Select Agents will report to law enforcement authorities any vehicle accidents, diversions, losses, or other reportable incidents that occur during transport, not more than 24 hours after the incident. Incident reports will be documented and records will be maintained and made available to the Cannabis Control Commission upon request.

Transportation Agent Requirements

Each employee or agent transporting or otherwise handling marijuana products for a marijuana transporter must be registered as a marijuana establishment agent and have a valid driver's license issued by the Massachusetts Registry of Motor Vehicles for all classes of vehicle the Marijuana Establishment Agent will operate for the Marijuana Transporter prior to transporting or otherwise handling Marijuana Products. Canna Select Transportation Agents will carry an Agent Registration Card at all times when transporting Marijuana Products and shall produce the Agent Registration Card to Cannabis Control Commission or Law Enforcement authorities on request.

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

Transportation Vehicle Components

Canna Select transportation vehicles will meet the requirements established in 935 CMR 500 and will be leased or owned by Canna Select. Transportation vehicles will have a current registration, inspection, and insurance valid in the Commonwealth of Massachusetts.

Canna Select Marijuana Transportation Vehicles will be equipped with:

- (a) An alarm system approved by the Cannabis Control Commission
- (b) Theft deterrent alarm system
- (c) Vehicle recovery system (i.e. Lo-Jack)
- (d) Well Maintained heating and air conditioning systems appropriate for maintaining correct temperatures for transportation of marijuana
- (e) A global positioning system (GPS) Monitoring device that is:
 - i. Mobile but not easily removable

- ii. Attached to the vehicle at all times
-

Transport Vehicle and Agent Requirements and Procedures

The transfer Vehicle must be monitored by the Monitoring Agent during transport of marijuana. The transfer Vehicle must be inspected by the Commission prior to initial transportation of marijuana, or after any alteration to the locked storage compartment. Marijuana products will not be visible from outside the vehicle and the vehicle will not bear any markings indicating that the vehicle is being used to transport marijuana products nor will it bear markings that identify the vehicle as a Canna Select vehicle. When transporting marijuana products, all marijuana products will be placed in a secure, locked storage compartment that is permanently attached to the marijuana transport vehicle. The secure, locked storage compartment will have multiple separate lockable compartments where deliveries to other Marijuana Establishments can be securely separated.

Any time that marijuana is present in the Transport Vehicle, the vehicle will be treated as a “Limited Access Area” and access will be restricted to:

- Employees, agents, or volunteers specifically permitted by Canna Select
- Representatives of the Cannabis Control Commission in the course of responsibilities authorized by 935 CMR 500
- Representatives of other state agencies of the Commonwealth
- Emergency responders in the course of responding to an emergency

Each Canna Select Agent transporting marijuana shall have access to a secure form of communication with personnel at the Canna Select Cultivation facility at all times the vehicle contains marijuana. Canna Select owned portable communication devices (cell phones) will be issued to Marijuana Transportation Agents. Cellular service coverage zones will be double-checked by Canna Select management and areas with inadequate or spotty service will be mapped to establish avoidance zones. These avoidance zones will be excluded from the randomized delivery route selection area.

Prior to and immediately after departure, Canna Select Transportation Agents will test communications with the originating location and receiving organization. Canna Select dispatch will simultaneously verify GPS operability. There will be two redundant GPS systems with equal capability operating over separate networks installed in each vehicle. In the event both GPS systems fail while en route, Transportation Agents will return to the originating location until GPS is again operational.

A Canna Select Dispatch Agent will be assigned to monitor the GPS and communicate with Transportation agents. Transportation Agents will contact Canna Select dispatch upon arrival at and immediately after departure from scheduled locations and in the absence of an emergency, unscheduled stops will not be permitted while marijuana products are in the vehicle. Canna Select Dispatch will check in with Canna Select Marijuana Transportation Agents at a minimum of every 30 minutes. The Canna Select Transportation Agent occupying the passenger seat of the delivery vehicle will handle all communications with Canna Select Dispatch. No Canna Select Agent will use a cell phone while operating a delivery vehicle.

The Canna Select Dispatch Agent will log all official communications with Canna Select Transportation Agents and Receiving Agents at other Marijuana Establishments.

In cases where Canna Select is to receive marijuana plants, seeds, or products from another Marijuana Establishment, a Canna Select Receiving Agent will be assigned to establish, maintain, and log communications with the relevant Agents of that Establishment.

Safety and Security Policies and Procedures

Along with this security plan, Canna Select will also provide Safety and Security Policies and Procedures Manual. Regularly updated physical copies of the Safety and Security Policies and Procedures Manual will be available in the security room and training areas of the facility. These procedures will require compliance with all safety, security, anti-diversion, and administrative requirements that can help eliminate or reduce the chance of diversion, theft, and loss from occurring.

The Safety and Security Policies and Procedures Manual will be one of several manuals in the Canna Select Policies and Procedures Compilation, which will include manuals for:

- (1) Safety and Security
 - (2) Opening and Closing Procedures
 - (3) Emergency Procedures
 - (4) Transportation, Receipt, and Delivery
 - (5) Inventory and Tracking
 - (6) Credentialing, Identification, and Authorization
 - (7) Communications with Cannabis Control Commission, the Town of Whately, Whately Police Department, Whately Fire, and other governmental and non-governmental entities
 - (8) Incident and notification requirements
 - (9) Health and Safety standards
 - (10) Sales Tracking and Client Services Policy
 - (11) Vendor Relations
 - (12) Positive Impact and Public Relations
 - (13) Maintenance of Records
 - (14) Prohibited purchases and practices
 - (15) Crisis Management
 - (16) Fire Safety Training
 - (17) Employee Training
 - (18) Employee Hiring, Retention, and Severance
 - (19) Product Testing
 - (20) Cannabis Production
 - (21) Infestation Prevention and Clean Zone Procedures
 - (22) Other Required Manuals
 - (23) Other Manuals deemed necessary by Canna Select Leadership
-

Safety and Security Training Policy

Newly Hired Employees will be enrolled in Canna Select's Agent Training College (CSAT College). Before new hires begin training on their official duties, they will attend a Safety and Security Training Course along with a number of other training courses at CSAT including:

- Health and Safety
- Infestation Prevention
- Clean Zone Procedures
- Theft and Diversion Prevention
- Emergency Procedures
- Safety and Security
- Cannabis 101 Intro
- Public, Client, and Regulatory Relations
- Benefits and Incentives
- Disciplinary Policy
- Facility Operations
- Canna Select Staff Network
- Additional Training as Required or Deemed Necessary

Upon completion of New Hire training courses, Employees will begin on-the-job training for their specific roles and be enrolled in Cannabis 101, a weekly, ongoing CSAT Course in which Cannabis Related Topics will be reviewed, topics covered in the New Hire Training Courses will be brought into greater clarity, and State Required Employee Certifications will be Renewed. Canna Select will provide and keep Course Curricula, text books and other academic supplies, Syllabi for all training courses, Canna Select Course Completion Certificates, and State required recertification materials in the CSAT Classroom. Canna Select Employees will recertify for their specific positions, permissions, and authorizations twice annually. Records of all training events and copies of Course Completion Certificates will be stored for a minimum of 10 years in the CSAT Binder and Electronic Database.

Hours of Operation:

8am-8pm; 7 days a week

Emergency/After Hours Contact Information:

Neal Dach | 909-496-8639 | NealDach@gmail.com

Insurance

Canna Select will work with Cannabis Insurance Specialists to acquire comprehensive insurance coverage tailored to meet company needs and comply with Massachusetts State Regulations (935 CMR 500.105(10)). Insurance Policies Canna Select will be covered will include coverage required by the CCC (marked “required”) and may include the following:

- Business Liability Insurance (required; \$1M per occurrence; \$2M aggregate)
- Product Liability Insurance (required; \$1M per occurrence; \$2M aggregate)
- Cargo Insurance for Cannabis Transportation
- Crop Insurance
- Commercial Property Insurance
- Workers Compensation Insurance
- Other Policies deemed necessary by Canna Select Leadership
- Other Policies required by the Cannabis Control Commission (CCC)

Coverage will include:

1. False advertising claims and common accidents
2. Injuries and illnesses caused by sold marijuana and other products
3. Damage to Property, Buildings, and Equipment due to natural disasters
4. Cargo that is lost or damaged during transport
5. Crops damaged due to fire or lightening

The deductible for each policy will be no higher than \$5000 per occurrence.

Business and Product liability insurance reports will be made available to the CCC upon request. Canna Select will maintain reports documenting compliance with 935 CMR 500.105(10).

If Canna Select is unable to obtain business and product liability coverage, a minimum of \$250,000 will be placed into an escrow account and reserved solely for liability coverage. Funds will be replenished within 10 business days of any expenditure.

Odor Reduction

- ✓ 3-Phase Odor Reduction
- ✓ Air Sealed Zones
- ✓ Neutral Pressure Exhaust

A three-phase odor reduction system will be installed in each grow area as well as the inventory storage vault. Sealed zones will be created around cannabis cultivation, drying, curing, trimming, cannabis waste, and inventory storage areas. Within each zone, carbon filters will circulate and scrub the air at a total flow rate calculated to filter every molecule of air in that zone every 15 minutes.

Each Sealed Zone will maintain neutral air pressure created by exhausting the air through one point at the same rate fresh air enters the zone. The exhaust from each zone will be filtered a second time through an activated carbon filter before entering a sealed ducting system before it is transferred to a common air bank. Before exiting the building through a filter system, all exhaust is filtered a third time through a series of activated carbon filtration screens reducing odor emission rates to negligible levels.

Olfactometer readings gathered before and after cannabis plant installation will be compared to develop thresholds used as a basis to monitor the effectiveness and functioning of the odor reduction system. Olfactometers will be used to test air quality at all exhaust ports as well as inside each Sealed Zone.

Sealed Zones will at a minimum include areas designated for:

- (1) Vegetative growth
- (2) Flowering
- (3) Trimming
- (4) Drying
- (5) Curing
- (6) Processing
- (7) Storage
- (8) Cannabis Waste
- (9) Hallways between rooms

Carbon Filters

- Designed to eliminate odors and chemicals for Grow Tents and Hydroponic Rooms
- Feature premium-grade Australian Charcoal with Higher Absorption and Longer Life Rating
- Contains Heavy Duty Stainless Steel flanging, Aluminum Mesh, and Clothed pre-filters
- Allows maximum airflow passthrough for both intake and exhaust configurations

Carbon Filter Specifications:

Duct Opening: 4" | Length: 13" | Airflow Rating: 210 CFM
Carbon: Australian RC412 at 1200+ IAV | Thickness: 38mm

Olfactometer Specifications

Model | OMX-ADM

Detection Method | Two Semiconductor Gas Sensors

Sampling Method | Continuous Sampling with built-in Air Pump

Object Gas | Hydrogen Sulfide, Methyl Mercaptan, Ammonia, etc.

Odor Strength Level | 0-999 ($\mu\text{g}/\text{m}^3$)

Classification | Odor Intensity 2.5-5.0

Power Supply | 4 AA Batteries*/AC Adapter

Memory Capacity | Up to 32732 bits of data

Storage Temperature | 0 to 40 °C (32 to 104 °F) * No condensation

Operating Temperature | -10 to 50 °C (14 to 122 °F) * No condensation

Dimensions | 74 (W) x 167.5 (L) x 35 (H) mm

Weight | 250g (without batteries)

*Battery life for continuous measurement is approximately 7 hours

Water Usage

- ✓ Water Resources
- ✓ Filtration, Storage, and Treatment
- ✓ System Maintenance
- ✓ Feed Solution Administration
- ✓ Water Use Efficiency

Canna Select will comply with Energy Efficiency and Conservation requirements listed in the Whately bylaws and the Cannabis Control Commission (CCC) directives (935 CMR 500.105). Daily Water Usage will be monitored and recorded. A weekly report will be created to analyze water consumption and identify opportunities for waste reduction. This report will be made available to Whately Town Officials, to the CCC, and to Whately Residents upon request.

Water Resources

A property with excellent water resources was chosen as the site for the Canna Select Cultivation Facility. The property boasts two shallow wells and two deep wells which are currently in use for agricultural purposes. The property also features a crop irrigation system which draws water from an abutting river.

From prior uses on the property, we know that the two shallow wells provide enough water to care for all the plants in the greenhouses even when the greenhouses are fully stocked. The plants grown there previously use similar amounts of water as cannabis. Canna Select will rely on the two shallow wells for the primary water source and the two deep wells as a back-up. In the event that both the shallow and deep wells fail, city water is also available on site as a tertiary option.

We are confident that onsite water resources will provide an ample supply of water because Canna Select will use less water than has typically been used at the site over the past 85 years. This is because Canna Select will utilize recirculating vertical hydroponic systems which are highly efficient. To illustrate, once filled with these systems, Greenhouses 1, 2, & 3 will house over 15000 plants but will use less than 2 gallons per day. The system will be flushed every 12 weeks. Wastewater procedures are described below.

Water Filtration, Storage, and Treatment

A Water Management System consisting of pumps, usage meters, 3-stage filters, a Water Storage System, and a Water Administration System will be used to ensure that feed solution (filtered water with plant growth nutrients added) is provided in amounts that optimize plant growth and flower production. The Water Management System will be integrated with the Environmental Control System (ECS) which receives and stores data from sensors reporting water and feed solution usage and quality as well as light and air conditions.

Source water will be pumped through a water usage meter and then a three stage filter before being stored in 330 gallon storage tanks. Storage Tanks will be equipped with dual sensors that detect Total Dissolved Solids (TDS), Electrical Conductivity (EC), pH, and Temperature. These parameters will be checked when tanks are filled and monitored continuously to ensure that they remain at acceptable levels. Stored water will be agitated with an air stone and an aqua chiller may be used to keep the temperature below 60° F to prevent algal blooms or other still water contamination.

Stored water will be checked to ensure that the TDS is under 500ppm, EC 0.05-200 $\mu\text{S}/\text{cm}$, pH 6.3-7 each time storage tanks are filled. If pH, TDS, and/or EC are not within desired levels, water will be pumped out of the Water Storage Tank into a tank that is not integrated into the Water Management System, the issue will be investigated, and corrective action will be taken.

Nutrient mixing

Canna Select cultivators will use a nutrient schedule specialized to supply right nutrients at the right stages of plant growth. Nutrient concentrates will be added to the Water Storage Tanks after they are filled and the water tested. Once Nutrients are added, the pH, TDS, and EC will be checked to ensure they are within prescribed levels. Nutrient schedules catered to plant strain and growth medium will be posted at appropriate Water Storage Tanks.

In the event that the pH, TDS, and/or EC do not fall within prescribed levels, the contents of the Water Storage Tank will be pumped into a portable, non-integrated water tank, the causal issue will be investigated, and appropriate corrective action will be taken. The undesirable mixture in the non-integrated water tank will be treated to bring pH, TDS, and/or EC to desired levels if possible and the treated mixture will be re-used.

Water Administration System

The majority of plants will be grown in greenhouses and will be grown in a vertical hydroponic system. These systems recirculate the nutrient solution and are highly water efficient. In fact, once the existing greenhouses are completely full, the hydroponic system (which will house 15,200 plants) will use less than 2 gallons of water per day.

Water Efficiency:

Water usage will be monitored and recorded continuously by the ECS and total daily usage will be recorded in a logbook at the end of each business day. A weekly Water Usage Report will be created to analyze water consumption and identify opportunities for future reduction opportunities. This report will be made available to Whately Town Officials, the Cannabis Control Commission, and Whately Residents upon request. Canna Select will also seek to acquire optimally efficient hydroponic and aeroponic systems to reduce its environmental footprint to the absolute minimum possible.

Wastewater:

A closed recirculating system will be used to eliminate runoff altogether. Nutrients will be applied on a weekly schedule. Periodically throughout the grow period, a nutrient rinse solution designed to eliminate nutrient buildup and relieve nutrient lockout will be applied to the system. This allows plants to absorb the remaining nutrients and causing the TDS levels to decline. Low TDS water (TDS: 500ppm, EC: 0.05-200 μ S/cm, pH: 6.3-7) will then be filtered and used in the next nutrient feeding schedule. Additional rinse periods will be employed at the end of each growing cycle the last week before harvest. After harvest, water will be filtered, transferred to a clean tank, and reused.

Water filtrate will be disposed of in compliance with state and federal requirements for discharge of pollutants into surface water or groundwater (Massachusetts Clean Waters Act, M.G.L.c. 21 §§ 26-53; 314 CMR 3.00: *Surface Water Discharge Permit Program*; 314 CMR 5.00: *Groundwater Discharge Program*; 314 CMR 12.00: *Operation Maintenance and Pretreatment Standards for Wastewater Treatment Works and Indirect Discharges*; the Federal Clean Water Act, 33 U.S.C. 1251 et seq., the National Pollutant Discharge Elimination System Permit Regulations at 40 CFR Part 122, 314 CMR 7.00: *Sewer System Extension and Connection Permit Program*), and wastewater stored pending disposal will be contained in an industrial wastewater holding tank in accordance with 314 CMR 18.00: *Industrial Wastewater Holding Tanks and Containers*.

System Maintenance

All components of the Water Management System will be checked for salt build-up and other debris that may impede proper functioning daily. TDS, EC, and pH of source water will be tested daily and monitored continuously by the integrated environmental control system. Source water samples will be sent out monthly to be tested for undesirable metals and minerals, anions, and pathogens.

Unfiltered and filtered water will be tested every month by an independent laboratory for the following:

General Characteristics

Alkalinity (as CaCO₃), Color, Conductivity, Hardness, LSI, Odor, pH, SAR, Silica, Total Dissolved Solids, Total Hardness, Turbidity

Metals & Minerals

Aluminum, Antimony, Arsenic, Barium, Beryllium, Boron, Cadmium, Calcium, Cerium, Chromium (Total), Cobalt, Copper, Iron, Lead, Lithium, Magnesium, Manganese, Mercury, Molybdenum, Nickel, Phosphorous, Potassium, Selenium, Silver, Sodium, Strontium, Thallium, Tin, Titanium, Uranium, Vanadium, Zinc

Anions

Chloride, Fluoride, Nitrate (as N), Nitrite, Sulfate

Pathogens

Coliform & E.Coli tested for Presence / Absence

Water filters will be changed every 3 months. Three Stage Water Filters remove the following undesirable solutes:

- 1st stage: Premium Quick-Connect 5 micron sediment filter. Dust, dirt, silt, sand, rust and scale particles are trapped here in a filter which also extends the life of the system.
- 2nd stage: Premium 10" GAC Granular Activated Carbon filter removes chlorine, radon, VOCs (volatile organic compounds) and other common chemicals. This filter also removes cloudiness, offensive odors, colors and unpleasant tastes.
- 3rd stage: 10" Premium CTO Carbon Block filter removes chlorine, VOCs (volatile organic compounds, including insecticides, pesticides and industrial solvent). Taste improvement.
- Standard 10" filters; Connection: 1/2" thread port; Working pressure: 20 to 100 psi

Exterior surfaces of Water Storage Tanks will be cleaned daily or as needed. Once a month, Water Storage Tanks will be disconnected from the Water Management System and the interior surfaces cleaned and thoroughly rinsed with filtered, tested water. TDS/pH/EC/Temp sensors will be calibrated and the batteries will be checked at the start of each day. Dual sensors will be used to monitor pH, EC, TDS, and Temperature in each storage tanks and when discrepancies between the two sensors emerge, both sensors will be re-calibrated and the batteries will be replace. If the discrepancy remains, both sensors will be replaced by two backup sensors with equal capabilities. The sidelined sensors will be tested to identify the issue responsible for the discrepancy, repaired when possible, and discarded when necessary. All maintenance actions will be logged into a maintenance database.

Marijuana and Wasting, Destruction, and Disposal Procedures

All Cannabis Waste, which includes waste composed of or containing finished marijuana products or byproducts, will be stored, secured, and managed in accordance with 935 CMR 500.105(12) and the Canna Select Wasting/Destruction Procedures. Products designated for wasting will be disposed of on a weekly basis.

Diversion Prevention and Record Keeping

In order to prevent waste diversion, all Marijuana Wasting/Destruction procedures will be performed by a minimum of two Canna Select Agents; all Marijuana Wasting/Destruction procedures will be done within viewable sight of the security cameras throughout the entirety of the process; and all camera footage of the Wasting/Destruction process will be stored for a period of no less than 90 days. All camera footage of Wasting/Disposal activities will be made available to the CCC upon request.

Canna Select will maintain Waste Disposal Records as required under 935 CMR 500.105(12). A Wasting/Destruction Log will denote Marijuana stored in the Waste Bin prior to the Wasting/Destruction. Wasting/Destruction Logs will be located in the Inventory Control Binder and attached to the Waste Bin. The log will include entries for date/time, product name, METRC#, weight, reason for quarantine, agent name/signature, manager name/signature. The General Manager will verify the accuracy of the Wasting/Destruction Log attached to the Waste Bin during a Weekly Inventory Control Audit by comparing it with the contents of the Waste Bin. The General Manager will then update the Wasting/Control Log in the Inventory Control Audit Log. At that time, any discrepancies and the corrective actions taken will be documented on the Inventory Control Audit Log. Wasting/Destruction Logs attached to the Waste Bin will be gathered weekly and stored for a minimum of 90 days. All Wasting/Destruction Logs will be made available to the CCC upon request.

Canna Select will create and maintain Wasted/Destroyed Products Logs to record and document all Marijuana that have been destroyed. These logs will include entries for date/time, product name, METRC#, weight, and agent name/signature. Wasted/Destroyed Product Logs will be located in the Inventory Control Binder. The General Manager will verify the Wasted/Destroyed Products Logs during the Weekly Inventory Control Audit and enter them into the Inventory Control Audit Log. Wasted/Destroyed Products Logs will be stored in the Inventory Control Binder for a minimum of 90 days. Wasted/Destroyed Product Logs greater than 90 days old will be uploaded digitally to the Canna Select Shared Drive for record keeping. The original copies will be stored off-site for document control. Any discrepancies and the corrective actions taken will be documented on the monthly Inventory Control Audit Log by the General Manager.

Wasting/Destruction Procedural Training

A Wasting/Destruction training course will be part of the new hire training required for all Canna Select Agents. Documentation of this training will be recorded in the Canna Select Training Logs. Training Logs will be stored in the Canna Select's Agent Training College (CSAT College) Training Binder for a minimum of 90 days and in the Electronic CSAT College Training database on the Canna Select Shared Drive indefinitely. Copies of Canna Select Training Logs will also be kept in the Canna Select Personnel Files specific to Agents who participated and completed the required training.

Marijuana Waste Containment (Pre-Wasting/Destruction Procedures)

Products that are outdated, damaged, deteriorated, mislabeled, contaminated, or whose containers or packaging have been opened or breached will be designated for wasting and will be stored in a separate quarantine area (Waste Area) within the Inventory Vault. This area will contain a waste bin that will remain secured when not in use. Products designated for wasting will be stored exclusively in the Waste Bin or in the Waste Processing Center (described below). If a misplaced Product Designated for Wasting is discovered, the Canna Select Agent who makes the discovery will be required to report the discovery to Management immediately. Management will review video footage to ascertain how the misplacement took place and take appropriate corrective actions.

Products Designated as Waste will include:

- Damaged or Defective Marijuana
- Expired Marijuana
- Contaminated Marijuana
- Marijuana or whose containers or packaging have been opened or breached
- Any Marijuana or awaiting disposal

The Waste Bin will only be removed from the inventory vault during wasting/destruction procedures. After Wasting/Destruction has been completed, the Waste Bin will be returned to the Inventory Vault.

Waste Processing Center

One Room in the Canna Select facility will be designated as the Waste Processing Center dedicated exclusively for Wasting/Destruction. The Waste Processing Center will be recorded on high definition video and will remain locked when not in use.

The Waste Processing Center will include the following equipment:

- ◆ A Shredder/Grinder
- ◆ Multiple Containment Vessels
- ◆ At least two mixing containers
- ◆ Additional Processing Medium/Substrates
- ◆ Interior Entrance and Exterior Exit Points

Preparation of products designated for wasting shall be contained within the secured Waste Processing Center in order to prevent any contamination spread to other areas in the facility and to mitigate the risk of product diversion.

Secured Waste Collection

In order to maintain security and avoid diversion, Green Waste will be collected throughout the day in designated receptacles that are secured, locked, and tracked on the Video Monitoring System (VMS). At the end of the day, the on-site quality control supervisor along with another staff member will collect all the waste and weigh it out on video. All data will be recorded on the Designated Waste Log. Marijuana will then be placed into the Waste Bin located in the Inventory Control Vault until the Wasting/Destruction Process takes place.

Wasting/Destruction Operations

Canna Select will conduct Wasting/Destruction Operations for Products Designated for Wasting on a weekly basis. Throughout the Wasting/Destruction process, a minimum of two Canna Select Agents will be present at all times. Prior to commencing Wasting/Destruction Operations, both Canna Select agents will do the following:

1. Sign out the Inventory Control Vault Door deadbolt key from Canna Select Security Agents
2. Unlock the Inventory Control Vault Door deadbolt
3. Retrieve the Waste Bin from the Inventory Control Vault
4. Lock the Inventory Control Vault deadbolt and secure the key
5. Transport the Waste Bin to the Waste Processing Center
6. Remove each product individually
7. Confirm weight, quantity, METRC tag, and other labels are correct

Verification of product data will be done on video recorded by the VMS. After verification and logging of all pertinent data, all waste will be rendered unusable and prepared for either compostable or non-compostable disposal.

Materials to be Wasted/Destroyed may include:

- Food Waste
 - Yard Waste
 - Vegetable Grease or Oils
 - Other waste approved by the Department of Agriculture such as biodegradable Non-compostable Materials utilized for the Wasting/Destruction Process
 - Paper Waste
 - Cardboard Waste
 - Plastic Waste
 - Soil or other waste approved of by the CCC
-

Process for Rendering Marijuana Unusable

Canna Select Agents will:

1. Place Marijuana in grinder and mulch until all pieces are smaller than .5 centimeters in length
2. Break up the Marijuana waste utilizing a grinder until it is completely separated and finely grated
3. Utilize a soil medium with volume equivalent to that of the Marijuana Waste (1:1; Soil Medium : Marijuana Waste)
4. Combine Both ingredients and mix thoroughly until Marijuana Waste is rendered unusable and unrecognizable
5. Complete the Canna Select Wasting/Destruction Log, located in the Cultivation Binder.
6. Update Waste Destruction Log in METRC
7. Sign out the key to the Secure Composting Bins from Security
8. Dispose of Wasted/Destroyed Marijuana products in Secure Composting Bins
9. Lock Secure Composting Bins
10. Return Key to Security

Completion of Wasting/Destruction

After the Marijuana wastes have been rendered unrecognizable and unusable, the Canna Select Agents responsible will:

- (a) Lock the Waste Bin
 - (b) Place Designated Waste Log inside plastic document protector located on top of the waste bin
 - (c) Unlock the Inventory Control Vault Door Deadbolt
 - (d) Place empty Waste Bin back into the Designated Waste Area inside the Inventory Control Vault
 - (e) Lock and Secure the Inventory Vault Door and Deadbolt
-

Designated Waste Log sheets will be collected by the Inventory Control Manager and stored inside the Canna Select Cultivation Binder.

Marijuana Waste Rendered Unusable will be transported to a licensed waste facility for disposal by two Canna Select Transportation Agents. The Wasted/Destroyed Marijuana will be loaded into the Canna Select Transport Vehicle and stored in the Secured Cargo Area within. The same protocols for transportation and delivery of Cannabis Products will be observed in the transportation of Cannabis Waste.

Liquid waste containing marijuana or marijuana byproducts will be disposed of in compliance with 935 CMR 500.105(12)(b) and all applicable state and federal requirements for discharge of pollutants into surface water or groundwater (Massachusetts Clean Waters Act, M.G.L.c. 21 §§ 26-53; 314 CMR 3.00: Surface Water Discharge Permit Program; 314 CMR 5.00: Groundwater Discharge Program; 314 CMR 12.00: Operation Maintenance and Pretreatment Standards for Wastewater Treatment Works and Indirect Discharges; the Federal Clean Water Act, 33 U.S.C. 1251 et seq., the National Pollutant Discharge Elimination System Permit Regulations at 40 CFR Part 122, 314 CMR 7.00: Sewer System Extension and Connection Permit Program), and wastewater stored pending disposal will be contained in an industrial wastewater holding tank in accordance with 314 CMR 18.00: Industrial Wastewater Holding Tanks and Containers.

The Head of Cultivation and the General Manager will ensure that all hazardous and chemical waste is disposed of in a manner consistent with federal, state, and local laws.

Upon delivery of Cannabis Waste, the two Canna Select Transportation Agents responsible will secure documents confirming the transfer of the Marijuana Waste to the Waste Facility from the designated

Waste Facility Employee. The responsible agents will return to the Canna Select Cultivation Facility and the documents will be stored in the Canna Select Cultivation Binder.

Transportation and Delivery

Canna Select will conduct Marijuana Product Transportation and Delivery in accordance with 935 CMR 600.105(13) and remain compliant with the regulatory guidelines detailed in 935 CMR 500.105(3)(b)15 and 935 CMR 500.105(13) et seq. and any other requirements or sub-regulatory guidance issued by the Cannabis Control Commission (CCC) or any other regulatory agency. All Cannabis Products (Marijuana and Marijuana byproducts (trim)) will be stored in compliance with 935 CMR 500.105(13)(d). Canna Select Transportation and Delivery Protocols will mitigate risks of theft, diversion, and vehicular incidents.

General Requirements

In accordance with CCC regulation 935 CMR 500.105(13)(a)1. Canna Select will only transfer Marijuana to other licensed Marijuana Establishments (MEs). All Canna Select Agents transporting Cannabis Products or Cannabis Waste will be Registered Agents with the CCC and Trained and Certified as Transportation Agents. The Canna Select Shipping Manager will ensure that all Cannabis Products marked for transport are packaged in sealed, properly labeled, and tamper or child resistant packaging before authorizing transport (935 CMR 500.105(13)(a)8).

Cannabis Delivery

All Cannabis Products that will be transported to other MEs will be tracked in METRC and a transportation manifest will be provided for each transportation. A minimum of two Canna Select employees will be responsible for Cannabis Product Delivery, one Canna Select Transportation Agent and one Canna Select Transportation Manager. Canna Select Dispatch will contact the receiving MEs to coordinate the deliveries prior to the departure. Prior to transportation, Cannabis Products marked for transportation will be weighed, inventoried, and accounted for on video inside the Canna Select Packaging area. Video must include:

- i. A recording of each Cannabis Product being weighed
- ii. An image of the weight readout on the scale
- iii. An image of the corresponding transfer manifest

Loading of packages into the transport vehicle will take place in the Canna Select Loading Bay and will be recorded on CCTV. The Canna Select Transportation Agent will remain with the vehicle at all times Cannabis Products are contained inside.

Upon arrival at the receiving ME, the Canna Select Transportation Manager will supervise the receiving MEs weighing, inventorying, an accounting of transported Cannabis Products on video in accordance with 935 CMR 500.105(13)(a)8.

Transportation routes and times will be varied, unpatternistic. All transportation routes will be entirely in the Commonwealth of Massachusetts. Non-Cannabis Products will not be transported with Cannabis Products. Cannabis Products deemed undeliverable or refused by the receiving ME will be transported back to Canna Select. Canna Select will not be selling seeds and clones, but if operational activities change, then procedures will be installed to ensure that all seeds and clones will be properly tracked and labeled in a form and manner compliant with CCC regulations. Cannabis Product Transport Vehicles requiring temperature control for safety in order to prevent temperature sensitive Cannabis Products from becoming spoiled or unsafe during transport will be equipped as necessary (21 CFR 1.908(c)).

No firearms will be located within a Cannabis Product Transport Vehicle at any time or on a Canna Select Agent at any time during business operations.

Emergency Stop Procedures:

In the event of an emergency stop during transportation of Cannabis Products, Canna Select Transportation Agents will comply with all lawful requests from law enforcement officials. Once the vehicle is stopped, the Canna Select Transportation Manager will immediately contact Canna Select Dispatch. Canna Select dispatch will remain on the phone throughout the entirety of the stop. Canna Select Dispatch will document the reason for the stop, the stop time and duration, and the stop location. If personnel are asked to exit the vehicle, the Canna Select Transportation Manager will be responsible for ensuring Canna Select Dispatch is aware of the vehicular exit and Canna Select Dispatch will record the time of exit. If the Transportation Agents are allowed to return to the vehicle, the Canna Select transportation manager will immediately detail the incident as to Canna Select Dispatch and Canna Select Dispatch will enter the time, officer requests, agent activities, and all other pertinent information into a traffic incident record. Traffic incident report records will be stored indefinitely on the Canna Select Shared Drive and in the Canna Select Transportation Binder.

Reporting Requirements

The Canna Select Transportation Manager will document and report any unusual discrepancies in weight, packaging, labeling, or inventory to the Canna Select General Manager immediately upon discovery. The discrepancies will be logged in the Canna Select Discrepancy Log located in the Transportation Binder. The General Manager will document and report any unusual or suspicious discrepancy in weight or inventory to the CCC and law enforcement authorities not more than 24 hours after discovery.

Any vehicle accidents, diversions, losses, or other reportable incidents that occur during transport will be documented and reported to Canna Select Dispatch by the Canna Select Transportation Manager. Canna Select Dispatch will notify the General Manager immediately and then create an incident report in the Canna Select Incident Log in which the following will be entered:

- Incident time
- Location
- Duration
- Names of Transportation Agents
- Cargo inventory sheet
- Information about other people and/or vehicles involved in the incident (Name, Insurance Information, Vehicle Registration Information, Contact Information)
- Cargo damaged or missing
- Names of responding officers
- Links to and location of relevant video footage within the Canna Select Shared Drive
- Any other available information

The Canna Select General Manager will report any vehicle accidents, diversions, losses, or other reportable incidents that occur during transport to the CCC and law enforcement authorities not more than 24 hours after the incident occurs.

Cannabis Product Transport Vehicles

Canna Select Transport Vehicles will be owned or leased by Canna Select. Canna Only Canna Select Transportation Agents will be allowed inside Cannabis Product Transport Vehicles during the performance of Transportation Operations. A GPS System will be integrated into all Cannabis Product Transport Vehicles and the vehicle location will be traceable from the Canna Select Dispatch Office. Delivery frequency will be minimized to conserve on fuel costs and minimize transportation risks.

All Canna Select Cannabis Product Transportation Vehicles will be properly registered, inspected, and insured in the Commonwealth of Massachusetts. Copies of these records will be included in the Grow Chester Transportation Binder and made available to the CCC, Whately Law Enforcement, and officials upon request. Canna Select Product Transportation Vehicles will be equipped with an alarm system to prevent and alert Canna Select Management and/or staff of possible break-ins or unauthorized activities. Product Transportation Vehicles will not bear the Canna Select logo or any markings or logos that indicate the vehicle is used for Cannabis Product Transportation. Marijuana Storage Areas contained in Product Transportation Vehicles will not be visible from outside. At no time

will firearms be kept or allowed in Product Transportation Vehicles or the Canna Select Cultivation Facility. All Canna Select Product Transport Vehicles will be equipped with a secure, permanently attached, locking storage compartment. If Cannabis Products destined for more than one ME are transported in the same trip, the Cannabis Products for each ME shall be kept in separate drawers within the locked storage compartment during transportation and separate manifests shall be maintained for each ME.

Communications

All Canna Select Product Transport Vehicles will contain a Global Positioning System (GPS) monitoring device that:

- (a) Is not a mobile device
- (b) Is not easily removable
- (c) Will remain attached to Product Transport Vehicles at all times
- (d) Monitored by Canna Select Dispatch and/or Canna Select Management
- (e) Will be inspected by the CCC prior to the first transport of Cannabis Products

All Canna Select Transportation Agents will have a cell phone provided by Canna Select as a method of secure communication in accordance with 935 CMR 500.105(13)(e)2. Canna Select transportation Agents will utilize Canna Select Transportation Cell Phones for communication with Canna Select dispatch and management. Transportation Agents will conduct communication checks with Canna Select Dispatch over issued cell phones prior to departing the facility for Cannabis Product delivery. GPS functionality will also be tested prior to departure. If the GPS unit becomes non-operational during Transportation of Cannabis Products, Canna Select Agents will return to the Canna Select Cultivation Facility until GPS system functionality returns. If Canna Select Transportation communications become non-operational during the transportation of Cannabis Products, Canna Select Agents will return to the Canna Select Cultivation Facility until the communication systems become fully functional.

The Canna Select Transportation Manager will contact Canna Select Dispatch upon arrival at and departure from all scheduled stops and every 30 minutes over the duration of any and all Cannabis Product Transportation Activities. The Canna Select Transportation Manager will monitor the vehicle's GPS and Canna Select cell phones while en route. The Canna Select Transportation Agent will drive the delivery vehicle. The Canna Select Dispatch Agent will log all official communications with the Canna Select Transportation Agents during Cannabis Product Transport.

Cannabis Product Transfer Manifests

Canna Select Cannabis Product Transfer Manifests will be completed in triplicate prior to loading and securing Cannabis Products into the secure cargo area in the Product Delivery Vehicle. The Canna Select Shipping Manager will be responsible for ensuring that all product and personnel information is accurately entered and that the Cannabis Product Manifest(s) have been signed by the Transportation Agent, the Transportation Manager, and the Dispatch Agent and will then sign the Manifest him/herself. No Product Transfers will occur without all four signatures on the Manifest. Before departure, a copy of the Cannabis Product Transfer Manifest(s) will be emailed to the destination ME(s). The original copy of each Cannabis Product Transfer Manifest will remain in the office of the

Canna Select Shipping agent at the Canna Select Cultivation facility. The second copy will be provided to the destination ME upon arrival by the the Transportation Manager. The Destination ME Receiving Agent will sign the third copy of the Cannabis Product Transfer Manifest and it will remain with the Canna Select Transportation Manager who will return it to the Canna Select Shipping Agent upon return to the facility. Upon arrival at a destination ME, the Canna Select Transportation Manager will provide the destination ME Agent with the Cannabis Product Transfer Manifest and the destination ME Agent will compare the Cannabis Product Transfer Manifest with the copy sent via email.

The following information will be entered into all Canna Select Cannabis Product Transfer Manifests prior to delivery:

- 1) The Canna Select name, logo, and registration number
- 2) The address of the Canna Select Cultivation Facility
- 3) The Date
- 4) The destination Marijuana Establishment (ME) name, address, and registration number
- 5) The names and registration numbers and signatures of the following individuals responsible for the Cannabis Product Delivery:
 - the Canna Select Transportation Agent(s)
 - the Canna Select Transportation Manager
 - the Canna Select Dispatch Agent
 - the Canna Select Shipping Manager
 - the Destination ME Receiving Agent
- 6) Cannabis Product information including the following:
 - Name
 - Type
 - Weight before departure (from Canna Select)
 - Weight upon receipt (at the Destination ME)
 - METRC#
 - Quantity
 - Price
 - Suggested Sale Price
 - Packaging Date
 - Expiration Date
 - Date of Sale
 - Product Description
 - Origin

- Product Transportation Manager Product transfer verification initials
 - Departure from Canna Select (for each product when weighed)
 - Arrival at Destination ME (for each product when re-weighed)
 - Destination ME Receiving Agent Product receipt verification initials
- 7) The Mileage of the Canna Select Product Transportation Vehicle prior to departure, upon arrival at the Destination ME, and upon return to the Canna Select Cultivation Facility.
 - 8) The time of departure from Canna Select
 - 9) The time of arrival at the Destination ME
 - 10) Vehicle make, model, and license plate number

The second and third copies of each Canna Select Cannabis Product Manifest shall be secured with the cargo in the secured cargo area of the Canna Select Transportation Vehicle from time of departure until time of arrival and the third copy will remain in the secured cargo area until return to the Canna Select Cultivation Facility. All Cannabis Product Transfer Manifests will cataloged and stored at Canna Select for at least two years and be made available to the CCC upon request.

Requirements for Canna Select Transportation Agents

All Canna Select Agents conducting Cannabis Product Transport Operations will be registered as Canna Select Transportation Agents and receive Agent Registration Badges. Senior Canna Select Transportation Agents will be promoted to Canna Select Transportation Managers. Canna Select Transportation Managers and will be subject to all requirements of non-senior Canna Select Transportation Agents. They will also be responsible for ensuring the proper job performance of non-senior Canna Select Transportation Agents. Upon Promotion, a new Canna Select Transportation Manager will be enrolled in a Canna Select Transportation Manager Training Course at Canna Select Agent Training (CSAT) College.

All Canna Select Transportation Agents must have Massachusetts Registry of Motor Vehicles driver's licenses in good standing. All Canna Select Transportation Agents will carry their driver's licenses on them during all Cannabis Product Transportation Operations. Canna Select Transportation Agents will carry and display their Agent Registration Badges while performing Cannabis Product Transportation Procedures and will be prepared to produce their Agent Registration Badges for verification and inspection to the CCC and Local and State Law Enforcement Officials upon request.

All Canna Select Transportation Agents will be trained on best practices to:

- (a) Reduce Energy
- (b) Reduce Water Usage
- (c) Engage in energy conservation
- (d) mitigate other environmental impacts

The training course instructors will be made up entirely senior Canna Select staff members. The training course instructor will sign and make two copies of each course completion certificate. One Copy will remain at CSAT College and the other will be given to the Agent trained. The Original will be placed in the Canna Select Transportation Binder. All Training Course Documents will be maintained for a minimum of 10 years.

Vehicular Access Control

All Canna Select Primary and Spare Vehicle Keys will be kept in a locking cabinet in the Security Room at the Canna Select Cultivation Facility. Each Vehicle and each key will have an its own identification number and those numbers will be stored along with all relevant vehicle and key information in a Vehicle Access Binder and in a Vehicle Access database on the Canna Select Shared Drive. The Canna Select Security Agent on duty will be notified of pending product deliveries at the start of each day by Canna Select Management and a delivery schedule will be posted on the door of the key cabinet. The Canna Select vehicle key sign-out sheet will include entries for key number, vehicle number, date, time out, agent names and registration numbers, and agent signatures, and Product Transfer Manifest Number(s), and time of return, and name and signature of Canna Select Security Agent on duty. Keys will be signed out in clear view of a VMS camera.

All keys will be attached to a key ring with a Bluetooth GPS Tracker and a key ID tag. If a key goes missing, the Transportation Manager will notify Canna Select Security immediately. Canna Select Security Agent on duty will create a missing key report and notify Canna Select Management. Canna Select Management will use the Bluetooth GPS Tracker, VMS video footage, and any other means available to attempt to locate the vehicle key. If the vehicle key cannot be located, the reasons for the loss will be investigated to determine better loss mitigation strategies and, if necessary, appropriate disciplinary action will be taken.

The following officials will be authorized access to Canna Select Vehicles upon request:

- Representatives of the CCC in the course of responsibilities authorized by 935 CMR 500.000
- Representatives of other state agencies of the Commonwealth
- Emergency responders in the course of responding to an emergency

Canna Select Transportation Procedures

The Canna Select Shipping Manager will produce a trip plan with detailed directions for each Cannabis Product Delivery. The trip plan will be shared with the Canna Select Dispatch Agent and the Canna Select Transportation Manager. Before the vehicle is loaded with product, the Canna Select Transportation Manager will contact the Destination ME(s) Receiving Agents to coordinate the product transfer.

Canna Select Transportation Agents will conduct a communications and GPS inspection with Canna Select Dispatch prior to departing the facility. The Vehicle Key bluetooth GPS tracker functionality will also be tested and verified by the Transportation Manager and Dispatch Agent. Immediately upon departure, while the vehicle is still in the Canna Select Employee Parking Area, the Canna Select Transportation Manager and Dispatch Agent will perform a second GPS and communications check. If either the communication or GPS check fails, the Transportation Agents will return to the facility until the issues are resolved.

After Cannabis Product Transport Departure, the Canna Select Dispatch Agent will notify the Destination ME(s) Receiving Agent(s) that the delivery is in process and provide him/her (them) with an estimated time of arrival. The Canna Select Transportation Agents will follow the trip plan to the

destination ME. If the route must deviate from the trip plan for any reason, the Canna Select Transportation Agents will notify Canna Select dispatch with a description of the deviation, the cause, and expected detour route. The Canna Select Dispatch Agent will send text notifications to Canna Select Management along with updates regarding route deviations.

Canna Select Dispatch will check in with the Canna Select Transportation Manager fifteen minutes before the estimated arrival time. The Transportation Manager will provide the Dispatch Agent with an updated ETA and location confirmation. The Canna Select Dispatch Agent will notify the Destination ME(s) Receiving Agent(s) of the Cannabis Product Transportation Vehicle location and updated ETA.

Upon approach/arrival at the Destination ME, the Canna Select Transportation Agents will take note of any unauthorized personnel in the product transfer area. If unauthorized personnel are detected, the Transportation Agents will divert to a nearby location, immediately notify Canna Select Dispatch, and communicate with the Destination ME to gain further clarification. Canna Select Dispatch will communicate with the Canna Select General Manager and the General Manager will monitor the situation. If the issue is not resolved promptly (within 15 minutes), the Canna Select General Manager will contact the Destination ME Management to resolve the issue.

Protocol for Vehicular Accident Response

The Canna Select Transportation Manager will call the Canna Select Dispatch Agent every half hour on the hour during delivery. If at any time during the trip the GPS or communication system fails, the Transportation Agents will return to the facility until the both systems become operational.

If the Canna Select Transportation Agents are involved in a motor vehicle accident, the Canna Select Transportation Manager will:

- i. Dial 911 and request police assistance if necessary
- ii. Always have one Transportation Agent located inside the vehicle (if situational conditions allow)
- iii. Notify the Canna Select Dispatch Agent of the Accident (who will then notify Management)
- iv. If the transportation vehicle damage makes the vehicle unsafe or impossible to operate, Canna Select Agents will request a second transportation vehicle come to the scene and a member of Canna Select Management will drive it there. All Cargo will be retrieved from the damaged vehicle, accounted for, and placed in the operational vehicle which will then return to Canna Select.
- v. All Canna Select Agents will comply with Law Enforcement instructions and orders

Canna Select Management will notify the CCC and local law enforcement of any vehicular accidents that occur during Cannabis Product Delivery within 24 hours.

Cannabis Product transfer at the Destination ME

The Destination ME Receiving Agent must be present when the Canna Select Product Transport Vehicle arrives. The Canna Select Transportation Manager will notify Canna Select Dispatch of their arrival. The Canna Select Transportation Agent (driver) will remain inside the Product Transport Vehicle during Product Transfer. The Canna Select Transportation Manager will deliver the Transportation Cases containing the Cannabis Products to the Destination ME Receiving Agent inside the Destination ME. The Canna Select Transportation Manager will present the Cannabis Product Transfer Manifest to the Destination ME Receiving Agent. The Destination ME Receiving Agent will verify the Cannabis Product Transfer Manifest against the emailed copy. The Destination ME Receiving Agent will verify that all tamper resistant tape or bands remain intact and undamaged. The Canna Select Transportation Manager will unlock the Transportation Case(s) and the Destination ME Receiving Agent will perform inventory using the Transfer Manifest. Cannabis Products will be weighed and a physical count of all items in each transportation case will be made. Once inventory is verified against the Cannabis Product Transfer Manifest, the Destination ME Receiving Agent will sign the Cannabis Product Transfer Manifest and return the tertiary copy to the Canna Select Transportation Manager.

If there is an inventory discrepancy in any Cannabis Product issue, the following Protocols will be carried out:

- 1) Missing and/or Damaged Products will be crossed off of the Transfer Manifest and initialed by both the Canna Select Transportation Manager and the Destination ME Receiving Agent
- 2) Deliverable Products will be left with the Destination ME Receiving Agent
- 3) The Canna Select Transportation Manager will report the discrepancy to Canna Select Dispatch
- 4) Canna Select Dispatch will notify the Canna Select Shipping Manager who will make appropriate corrective actions
- 5) The Canna Select Shipping Agent will contact the Destination ME to schedule delivery of replacement products

Return of Cannabis Products to Canna Select Cultivation Facility

All Cannabis Products will be tracked in METRC as “in transport to Canna Select Facility”. An updated Product Transfer Manifest will be created by the Canna Select Shipping Manager. The updated manifest will indicate what products were returned to Canna Select. The updated Product Transfer Manifest will be emailed to the Destination ME. The Canna Select Transportation Manager will receive two copies of the updated Product Transfer Manifest from the Destination ME Receiving Agent. All Cannabis Product Returns will be secured along with appropriate Transfer Manifests in the Product Transportation Cases with tamper proof tape and returned to the Secure Cargo Area in the Product Transportation Vehicle. The Canna Select Transportation Manager will notify Canna Select Dispatch of their departure back to the facility, give an ETA, and provide regular check-ins in the same fashion as with the original product delivery.

Prior to Cannabis Product Receipt at the Canna Select Cultivation Facility, Canna Select Security will inspect the facility perimeter and a security agent will stand post in the receiving area to ensure that no unauthorized personnel are present. If suspicious activities or persons are found, Canna Select Security will immediately notify the General Manager and the Transportation Agents. The Canna Select General Manager will attempt to rectify the situation and call local law enforcement if necessary.

When approaching the Canna Select Receiving Area, the Transportation Manager and Canna Select Shipping Manager will unload all Transportation cases and bring them into a location where they will be weighed and inventoried. The Canna Select Dispatch Agent will be notified that the trip is complete and the vehicle keys will be signed in and secured in the locking key cabinet. Transfer Manifests will be filed appropriately by the Shipping Manager.

Community Impact

Canna Select isn't just a business it's been a home to the people who work there, as is the Town of Whately. Success begins with commitment to community and this positive impact plan has been created to ensure that Canna Select remains involved in community support year after year.

Canna Select will engage in community outreach activities and provide charitable contributions to local schools, police and fire, public parks, and any other recommended beneficial actions coming from the Town of Whately.

Positive Impact Plan Objectives

Canna Select will:

- Provide Aid and employment opportunities to Massachusetts residents who have been negatively affected by the drug war
- Provide Aid and Employment Opportunities to Massachusetts residents in areas of disproportionate impact including
 - Greenfield
 - Amherst
 - Springfield
 - West Springfield
- Promote Community development through education, music, and art
- Canna Select Presents The Path Forward: an individualized curriculum for first-time business starters.
- Provide educational, advisory, and networking resources to entrepreneurs who are
 - i. Starting a business for the first time
 - ii. Residing in an area of disproportionate impact
 - iii. Running a business in an area of disproportionate impact

iv. Lacking in start-up capital and need solutions

- Empower non-business owners to start their first business by
 - i. Promoting The Path Forward in areas of disproportionate impact
 - Radio Advertisement
 - Promotional Events
 - Networking with Police, Fire, and Town Officials

Packaging and Labeling

Canna Select will conduct the following regulations for packaging and labeling:

1. Cannabis packages and labels shall not be made to be attractive to children.
2. All cannabis product labels shall include the following information, prominently displayed and in a clear and legible font:
 - a. Manufacture date and source.
 - b. The statement “SCHEDULE I CONTROLLED SUBSTANCE.”
 - c. The statement “KEEP OUT OF REACH OF CHILDREN AND ANIMALS” in bold print.
 - d. The statement “FOR MEDICAL USE ONLY.”
 - e. The statement “THE INTOXICATING EFFECTS OF THIS PRODUCT MAY BE DELAYED BY UP TO TWO HOURS.”
 - f. The statement “THIS PRODUCT MAY IMPAIR THE ABILITY TO DRIVE OR OPERATE MACHINERY. PLEASE USE EXTREME CAUTION.”
 - g. For packages containing only dried flower, the net weight of medical cannabis in the package.
 - h. A warning if nuts or other known allergens are used.
 - i. List of pharmacologically active ingredients, including, but not limited to, tetrahydrocannabinol (THC), cannabidiol (CBD), and other cannabinoid content, the THC and other cannabinoid amount in milligrams per serving, servings per package, and the THC and other cannabinoid amount in milligrams for the package total.
 - j. Clear indication, in bold type, that the product contains medical cannabis.
 - k. Identification of the source and date of cultivation and manufacture.
 - l. Any other requirements set by regulations.

Inventory Tracking

In order to remain compliant with state regulations and provide proper tracking and transparency, Canna Select intends to use METRC's tracking system, which is approved and endorsed by the Cannabis Control Commission.

METRC will allow Canna Select to provide Transparency and Real-Time Tracking to the Cannabis Control Commission. Through METRC, the CCC will be able to track all regulatory events integrated across all license types, trace the source of inventory issues, initiate product holds, and notify Canna Select Management. METRC also allows the monitoring regulatory compliance and identification of taxable events. The CCC may also use METRC to brief stakeholders, conduct cases, and share aggregate data with the public. Data uploaded to METRC by Canna Select will not be visible to other Marijuana Establishments and gathered by the CCC will not be shared with any other licensees.

Inventory and Tracking

Canna Select will also use METRC's seed-to-sale tracking solutions to identify key data points to streamline and optimize inventory management at each phase of the operation including:

- (A) Custom Compliance-Focused Reporting
 - (B) Track Waste, Destruction, Account for Conversion and Moisture Loss
 - (C) Real-Time Product and Strain Recalls
 - (D) Easily Track Clones Back to Mothers
 - (E) Transport Manifests with All Required Info, including Transport Product with Ease
 - (F) Compliance-Focused Labels
-

METRC utilizes unique Radio Frequency Identification (RFID) tags to track each plant's location and identity. Both Plant and Package tags will be provided to Canna Select by METRC.

Canna Select will use inventory tracking software that provides the following functions:

- Yield Forecasting – Monitoring and analyzing the harvest data to optimize for larger yields.
- Grower-Centric – Customizing workflows to support the weighing of multiple plant by-products (wet or dry), plus multiple data collection points and ability to grade product quality upon curing.
- Analyze Efforts – Monitoring Pesticides and Nutrients applied, log Strain Notes detailing light and watering cycles, plus review Past Harvest Data to optimize your future yields.

A real-time inventory shall be maintained as specified by the Commission and in 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, and flowering; marijuana ready for dispensing; all marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.

Canna Select will:

1. Establish inventory controls and procedures for the conduct of inventory reviews, and comprehensive inventories of marijuana products in the process of cultivation, and finished, stored marijuana;
 2. Conduct a monthly inventory of marijuana in the process of cultivation and finished, stored marijuana;
 3. Conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory; and
 4. Promptly transcribe inventories if taken by use of an oral recording device.
-

Each inventory shall 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. The establishment shall tag and track all marijuana seeds, clones, plants, and marijuana products, using a seed-to-sale methodology in a form and manner to be approved by the Commission. No marijuana product, including marijuana, will be sold or otherwise marketed for adult use that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

Record Keeping

Canna Select will keep records available for inspection by the Commission, upon request. The records of a the establishment shall be maintained in accordance with generally accepted accounting principles.

Written records that are required and are subject to inspection include the following:

- (a) Written operating procedures as required by 935 CMR 500.105(1);
- (b) Inventory records as required by 935 CMR 500.105(8);
- (c) Seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105(8)(e);

Handling of Marijuana

Canna Select will process marijuana products in a safe and sanitary manner. The establishment shall process the leaves and flowers of the female marijuana plant only, which shall be:

1. Well cured and generally free of seeds and stems;
2. Free of dirt, sand, debris, and other foreign matter;
3. Free of contamination by mold, rot, other fungus, and bacterial diseases;
4. Prepared and handled on food-grade stainless steel tables; and
5. Packaged in a secure area.

Canna Select will comply with the following sanitary requirements:

- i. Any marijuana establishment agent whose job includes contact with marijuana or inedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements.
- ii. Any marijuana establishment agent working in direct contact with preparation of marijuana or inedible marijuana products shall conform to sanitary practices while on duty, including: a. Maintaining adequate personal cleanliness; and b. Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
- iii. Hand-washing facilities shall be adequate and convenient and shall be furnished with running water at a suitable temperature. Hand-washing facilities shall be located within the establishment in production areas and where good sanitary practices require employees to wash and sanitize their hands, and shall provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
- iv. There shall be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
- v. Litter and waste shall be properly removed, 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 shall be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
- vi. Floors, walls, and ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair;
- vii. There shall be adequate safety lighting in all processing and storage areas, as well as areas

where equipment or utensils are cleaned;

- viii. Buildings, fixtures, and other physical facilities shall be maintained in a sanitary condition;
- ix. All contact surfaces, including utensils and equipment, shall be maintained in a clean and sanitary condition. Such surfaces shall 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 shall be so designed and of such material and workmanship as to be adequately cleanable;
- x. All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products;
- xi. A Marijuana Establishment's water supply shall be sufficient for necessary operations. Any private water source shall be capable of providing a safe, potable, and adequate supply of water to meet the Marijuana Establishment's needs;
- xii. Plumbing shall 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 shall properly convey sewage and liquid disposable waste from the Marijuana Establishment. There shall be no cross-connections between the potable and waste water lines;
- xiii. Canna Select shall provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
- xiv. Products that can support the rapid growth of undesirable microorganisms shall be held in a manner that prevents the growth of these microorganisms;
- xv. Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers.
- xvi. All vehicles and transportation equipment used in the transportation of marijuana products or edibles requiring temperature control for safety must 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).
- xvii. Canna Select will comply with sanitary requirements. All edible products shall be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: Minimum Sanitation Standards for Food Establishments.

Storage:

Canna Select will provide adequate lighting, ventilation, temperature, humidity, space, and equipment,

in accordance with applicable provisions of 935 CMR 500.105 and 500.110.

Canna Select will have separate areas for storage of marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, until such products are destroyed. Storage areas shall be maintained in a clean and orderly condition. Storage areas shall be free from infestation by insects, rodents, birds, and pests of any kind. Storage areas shall be maintained in accordance with the security requirements of 935 CMR 500.110.



Canna *Select*

Notes: