



4 DAILY OPERATIONS

4.1 Staff Hygiene

All EAGLE ONE employees understand the importance of hygiene for the safety and integrity of the product and of Patient's health. Every employee agrees to:

- (a) Clean his or her hands and exposed portions of his or her arms in a hand-washing sink:
 - i. Before preparing edible marijuana products or marijuana-infused products, including, without limitation, working with ingredients, equipment or utensils;
 - ii. After handling soiled equipment or utensils;
 - iii. After touching bare human body parts other than his or her clean hands and exposed portions of arms; and
 - iv. After using the toilet facilities.
- (b) If working directly in the preparation of edible marijuana products or marijuana-infused products:
 - i. Keep his or her fingernails trimmed, filed and maintained so that the edges and surfaces are cleanable; and
 - ii. Unless wearing intact gloves in good repair, will not have fingernail polish or artificial fingernails on his or her fingernails.
- (c) Wear clean clothing appropriate to the tasks assigned to him or her.

If any Eagle One PCA has any health condition that they reasonably believe may adversely affect the safety or quality of Eagle One Products, that PCA is prohibited from having direct contact with any Products or product-related equipment until a designated Eagle one authority determines that the health condition of the PCA will not adversely affect the Product.

More broadly, the hygiene obligations set forth in Sections 80 to 101 of the adopter regulations, and their parallel presentation in both the NRS and NAC, will be converted into a clearly defined hygiene regime and effective training program. Any Eagle staff who are involved in the production or processing of medical-grade marijuana or marijuana-related Product will be required, with recurrent regularity, to complete such training and affirm their hygiene practices. Eagle One is unalloyed in its commitment to Product safety and conscientious care for Patient health.

4.2 Serving & Transaction Limits

[INSERT RELEVANT LIMITS – ORDINANCE]

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4.3 Patient-Service Guidelines

EAGLE ONE strives to be a leader in efficiently and effectively serving patients and providing the best possible experience. In order to clearly communicate and understand what a patient is looking for:

- Ask a Patient to describe the symptoms they want to address.
- Ask a Patient to describe the TYPE of relief they are looking for.
- Phrase questions in a way that makes Patients feel comfortable. For example “Of all the people I see in your situation...”

Finally, when consulting with a Patient, take a few minutes to share about yourself and about your experience (when appropriate and in a professional manner).

4.4 Operational Workflow

4.4.1 General Procedures

[INSERT RELEVANT CROSS-REFERENCES FROM OTHER OPERATIONAL MATERIALS]

4.4.2 Opening checklist

- Lock the door behind you as you enter the building.
- Unarm the security system.
- Turn on the lights in the facility.
- Store your personal belongings in your locker.
- Put on your badge.
- Clock in for your shift.
- Open product vault and begin stocking the shelves for the day.
- All Bud Tenders/Cash Handlers need to log into Green Bits and prepare your cash drawer for your shift.
 - Open the safe and take the appropriate bank bag out. Make sure the safe is securely closed once you remove your bag.
 - Count your bank bag to ensure that your starting cash is exact. \$[?].
 - Make sure to enter your exact starting cash into Green Bits. For example, If your bank bag only has \$195 in it, then you enter \$195.
- Turn on the music.
- Do a sweep of the store to make sure that the space looks tidy.
- Do a sweep behind the counter to make sure that your inventory is sufficiently stocked and the area is tidy.

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- **MANAGEMENT/LEAD PCAS** should ensure that the security has arrived and is ready to begin their shift.
 - Ensure that the staff is sufficiently prepared for their shift, and logged into their POS terminal.
 - Facilitate a short team huddle to brief the staff on daily goals and any pertinent business matters.
 - Check phone messages.

4.4.3 Closing checklist

- Lock the doors.
- Begin loading the back stock of inventory onto the carts to bring to the product vault.
- All Bud Tenders/Cash Handlers need to count down and reconcile their cash at the end of the business day
 - Take your starting cash total (?) and the 'Net Cash' amount listed for your shift. The amount in the cash drawer needs to add up to the sum total of these two figures. It helps to have paper available to write the totals out for the cash and change as you tally it up.
 - Start with the largest bills first. Count them out and lay them on the counter, all facing the same way. Write down the amount. Count down the hundreds, fifties, twenties, tens, fives and ones and lay them out in piles according to denomination. Write down the total for each of these denominations in a separate row on your piece of paper. Once again, make sure that all of the bills are facing the same way. Count down the change. Keep the change in its own compartment to better keep track of it. Write down the totals as you go.
 - Add up the total of the cash drawer and reconcile it against your ending figure from step 1. The amount should match. If it doesn't, recount your piles and make sure that your figures are correct. If there still is no match, check under the cash drawer to make sure some money didn't end up under there. If you have an overage or you fall short, you need to make note of this and track down where the error happened. YOU are ultimately responsible for any overages/shortages. Please note any details, notify the assistant manager, and expect a follow-up.
 - Enter your net cash amount that you counted.
 - Print your 'Shift Report', highlight the 'Net Cash', 'Closing Drop', and 'Over/Short' amount to signify to the manager that you have noted and take responsibility of those numbers.
 - Log out of Green Bits.

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- Secure your closing drop, along with your 'Shift Report' in the (?envelope). Put the envelope directly in the drop safe.
- Sweep & Vacuum.
- Stock and tidy the bathrooms.
- Windex the glass display cases and make sure displays look neat and presentable.
- Replenish the educational material.
- Turn off the music.
- Sweep the entire building (incl. restrooms) to ensure that no one is unaccounted for.
- Glance over the area to make sure the space looks exactly like you would want to find it in the morning when you open.
- Clock out at the end of your shift.
- Take your personal items out of your locker.
- Turn out the lights
- Arm the alarm and lock the door behind you.

4.4.4 Transition Checklists

4.4.4.1 Morning Shift > Evening Shift

- Windex display cases.
- Make sure display cases look neat and presentable.
- Make sure the back-stock of inventory is fully stocked.
- Replenish bathroom supplies and tidy.

4.4.4.2 Start of Evening Shift

- Store your personal belongings in your locker.
- Put on your badge.
- Clock in for your shift.
- Meet in the backroom for a brief team huddle led by the Assistant Manager or Lead Bud Tender.
- All Bud Tenders/Cash Handlers need to prepare your cash drawer for your shift.
 - Open the safe and take the appropriate bank bag out. Make sure the safe is securely closed once you remove your bag.
 - Count your bank bag to ensure that your starting cash is exact. \$[x].
 - Once your cash drawer is ready, exit the back room and take your cash drawer directly to the POS terminal you will be working at. Make sure the previous cash handler is ready to suspend their shift.

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- Make sure to enter your exact starting cash into Green Bits. For example, if your bank bag only has \$195 in it, then you enter \$195.
- Evening shift MANAGEMENT/LEAD PCAS should ensure that the security has arrived and is ready to begin their shift.
 - Facilitate a short team huddle to brief the staff on daily goals and any pertinent business matters.
 - Ensure that the staff is sufficiently prepared for their shift, and logged into their POS terminal.

4.4.4.3 End of Morning Shift

- All Bud Tenders/Cash Handlers need to count down and reconcile their cash at the end of their shift.
- Suspend your shift when the evening cash handling bud tender has arrived to take your place.
 - Take your cash drawer to the back room.
 - Take your starting cash total (?) and the 'Net Cash' amount listed for your shift. The amount in the cash drawer needs to add up to the sum total of these two figures. It helps to have paper available to write the totals out for the cash and change as you tally it up.
 - Start with the largest bills first. Count them out and lay them on the counter, all facing the same way. Write down the amount. Count down the hundreds, fifties, twenties, tens, fives and ones and lay them out in piles according to denomination. Write down the total for each of these denominations in a separate row on your piece of paper. Once again, make sure that all of the bills are facing the same way. Count down the change. Keep the change in its own compartment to better keep track of it. Write down the totals as you go.
 - Add up the total of the cash drawer and reconcile it against your ending figure from step 1. The amount should match. If it doesn't, recount your piles and make sure that your figures are correct. If there still is no match, check under the cash drawer to make sure some money didn't end up under there. If you have an overage or you fall short, you need to make note of this and track down where the error happened. YOU are ultimately responsible for any overages/shortages. Please note any details, notify the assistant manager, and expect a follow-up.
 - Go back out to the POS terminal you were working at. When time allows discretely and swiftly open your suspended shift and enter the net cash amount that you counted from your cash drawer.

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- Print your 'Shift Report', highlight the 'Net Cash', 'Closing Drop', and 'Over/Short' amount to signify to the manager that you have noted and take responsibility of those numbers.
- Log out of Green Bits.
- Secure your closing drop along with the 'Shift Report' in the (?envelope). Put the envelope directly in the drop safe.
- Take your personal items out of your locker.
- Clock out at the end of your shift.
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4.5 Point of Sale Cash Operations

4.5.1 General Procedure

4.5.1.1 Handling and safeguarding cash

All cash should be kept in a locked/combinati on vault or safe, or, in a locked room in a locked drawer or file cabinet, during non-business hours. Access to areas where cash is stored should be limited to only those employees who need access, and have been designated to have access. During business hours, all forms of cash should be stored in locking drawers, cash registers, and cash boxes. Only the cashier collecting these monies should control over this cash, and make sure that the cash is securely locked when they take lunch, or a break. The cashier should have complete control and responsibility for the cash they collect during business hours. To reduce the risk of error, all cash should be separated according to the denomination, and should face the same direction. When possible, areas that store cash should be alarmed during non-business hours. · All types of cash should be deposited within 3 business days.

Separation of Duties: The cashier accepting the cash payments in the register balances these payments daily. There will be a form documenting which employee was assigned to which register number. This deposit goes to another employee to have the monies confirmed, and the appropriate documentation prepared. Management will count the daily cash deposits prepared by employees for each register. Management will prepare the deposit for the armored pick-up. Management will document the deposit amount to make sure that it reconciles with EAGLE ONE accounting.

4.5.1.2 Opening the cash drawer

Shift opening steps should include having the employee sign in to the register log. Get the appropriate bank bag for your register. Count the starting money for the cash drawer, verification of the amount by a second employee, and recording the opening amount in Green

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Bits. Employees must follow safe cash-handling procedures when processing transactions during their shifts -- You are held responsible for any discrepancies in your cash drawer.

4.5.1.3 Closing the cash drawer

At the end of their shift, each employee should count the cash in their drawer. These counts should be verified by a second employee. The employee should record all these amounts on their shift report.

4.5.1.4 Petty Cash

Employees needing to get change should request a petty cash from management. Management is responsible for distributing appropriate change, and ensuring that there are small bills and change readily available at all times. This cash should be counted daily and logged by management.

4.5.2 Managements Daily/Weekly Cash Reconciliation Procedure

4.5.2.1 DAILY SALES RECONCILIATION

Gather the daily drops from the drop safe.

Fill out your daily sales worksheet.

- Organize your drop envelopes sequentially by register number. Starting with register 1.
- Pull out the shift report. Highlight the 'Net Cash' amount, the 'Closing Drop' amount, and the 'over/short' amount.
- Take a moment to note that everything on the report looks correct. For example: The time that the shift was opened, the employee that opened it, the starting cash amount (should always be \$200), the dates that the shift was open, discounts (discounts should be regularly investigated to make sure that everyone is following discount guidelines), etc.
- Record the numbers on your Daily Sales Worksheet. Document the reasons for any overages/shortages in the notes section. Each employee should be noting and explaining any discrepancies. If not, please get in contact with the employees that worked that shift and investigate. **ALL VARIANCES IN THE NUMBERS NEED TO BE ACCOUNTED FOR.**
- Count the cash in the envelope making sure that the cash in the envelope matches the amount documented in the 'Closing Drop' column. Any discrepancies need to be addressed with the employee operating the register on that date/time. The employee on that register is responsible for those discrepancies.

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- Once each envelopes information is properly recorded, and the money is accounted for, total the weekly deposit on the worksheet. Recount all the cash to make sure that your total on the worksheet matches the total cash in hand. You are responsible for those discrepancies.

Fill out a bank deposit information for armored truck pick-up. Put the deposit slip and the cash into a bank bag. Store that bank bag in the safe until armored truck comes for pick-up. It is your responsibility to keep that money in a safe place and ensure its security until it is deposited in the bank.

Clip the coinciding shift reports with the weekly sales worksheet and the deposit slip so that all the information is in one place, and all the money is fully accounted for. File in the appropriate months file.

4.5.2.2 Daily Sales Worksheet

DATE / REGISTER #	NET CASH	CLOSING DROP	OVER/SHORT	NOTES
TOTALS:				

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DATES	DAILY DEPOSIT TOTAL (the sum of all the closing drops)

4.5.2.3 Monthly Sales Worksheet

***PLEASE PRINT A MONTHLY SALES REPORT AND ATTACH IT TO THIS WORKSHEET, AND FILE IN THE APPROPRIATE FILE.**

WEEKS DATES	WEEKLY GROSS SALES	WEEKLY DISCOUNT	WEEKLY NET SALES	WEEKLY GOAL	VARIANCE	NOTES

MONTHLY TOTAL				MONTHLY GOAL		
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4.5.3 Management's Weekly/Monthly Reports

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5 INVENTORY MANAGEMENT

5.1 Loss & Diversion Prevention

The security measures will secure the medical marijuana against diversion for non-medical purposes by protecting against theft not only from intruders, but also from staff members and visitors. This is done by limiting access both into and within different areas of the facility as necessary and by surveillance monitoring of personnel and visitors at all times when in close proximity to the product. Strict inventory control measures will also be engaged to prevent and detect diversion.

5.1.1 Daily Operations Training

EAGLE ONE will diligently train and periodically audit employees on all inventory management practices, including the use of EAGLE ONE's integrated Seed-to-Sale based Point of Sale (STS+POS) software and Inventory Control protocols. EAGLE ONE employees will learn compliant practices and technologies necessary to daily operations and useful for identifying inventory discrepancies and potential diversion. Stringent execution of the Inventory Control procedural steps and STS+POS reporting capabilities will ensure that EAGLE ONE has complete and real-time awareness of its entire inventory of medical marijuana products.

5.1.2 Diversion Prevention Training

All EAGLE ONE Dispensary employees will be trained in procedures related to detection and prevention of diversion of medical marijuana. This will be in addition to training on all daily operations standard operating procedures.

EAGLE ONE's Diversion Prevention Training will address:

- Security measures and anti-diversion controls (i.e., preventing theft, loss, or misuse of marijuana);
- Using the Department's Seed-to-Sale (Electronic Tracking) System as an anti-diversion tool;
- PADOH Rules and Regulations relating to medical marijuana;
- Preventing the diversion of marijuana from states where it is legal under state law in some form to other states;
- Physical Security;
- Operational policies and procedures, including
 - patient data and certificate verification;
 - limitations on dispensing medical marijuana products;
- Reporting Requirements and Channels; and

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- EAGLE ONE's "whistleblower" structure and procedures, designed to ensure complete safety and protection in reporting possible issues relating to diversion or negligence.

5.1.3 Training Frequency

Training sessions will also be conducted throughout the year. This training may be conducted by licensed third parties, as permitted by the Department, including: law enforcement, consultants, and other presenters on topics that EAGLE ONE determines are relevant to the employees at EAGLE ONE Dispensary facilities. All EAGLE ONE employees, as well as contracted third parties, will acknowledge by signature that they have read and understand all policies and procedures for which they have been trained.

5.2 ERP - Patient Management

5.2.1 Intake & Data-Collection - Dispensary

Careful attention to and preservation of patient records is vitally important to regulatory compliance and effective operations management. Eagle One's patient-information management system ("ERP") will create and maintain patient records as the backbone for transaction management and tracking. Eagle One's ERP will regularly and via automated process send the relevant patient verification—and other salient transactional and inventory data—to the state system, via API and up-to-date integrations.

When a Patient arrives at the store, they will be courteously checked into the system, calling up the complete record of their historical interactions and ensuring that any new information is properly captured. Eagle One's ERP solution will ensure the following as a pre-requisite to any dispensation of medical marijuana:

1. Identity verification of the presenting patient or designated caregiver;
2. Availability of appropriate and useful educational information;
3. Registry ID verification;
4. That the transaction is within the patient's permitted quantity range for the relevant period.

The patient-record will enable Eagle One to regularly and effectively associate related materials and information, such as: state issued identification cards, recommendations, intake forms and all paperwork relating to the intake process, registration number, expiration date and photo ID.

Patient-record and general ERP data entry and modifications will be logged with changes made, username, and timestamp meta-data. Eagle One policy and system-permissions will ensure that only the appropriate agents will have access to viewing and modifying records. Strict control of Eagle One devices and authorizations will limit the existence of or access to patient-

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record data, and fail-safes will be put in place to enable administrators to de-authorize all devices at any moment, as well as logging out all users. With this enabled, if EAGLE ONE IT security is breached, proprietary information and patient-privacy data can be protected with the push of two simple buttons.

In order to actively ensure compliance with California regulations regarding purchasing quantities over periods of time, Eagle One's ERP will track for each patient their historical weight purchased, both of flower and infused products (tracked by weight of pre-mixed infusion). Sales that would exceed the established cumulative transaction limit will be blocked at the point of sale and the employee is alerted that the purchase exceeds the allowed weight. If a patient has an approved override to this limit, their unique purchase limit can be tracked individually. Any such denials of service will be logged within order notes, for cases where patients have already purchased their maximum allowable weight or any other reason.

EAGLE ONE's system will further ensure that expired, banned or otherwise unqualified patients and caregivers are flagged and thereby unable to conduct transactions within the sales system.

In addition, the patient-and-inventory management system will collect the following per-transaction data:

- a. The name and number of the **registry identification** card of the patient or the name of the designated primary caregiver of the patient;
- b. The **amount** of medical marijuana dispensed;
- c. Whether the medical marijuana was dispensed to the **patient or to the designated primary caregiver** of the patient;
- d. The **date and time** at which the medical marijuana was dispensed;
- e. The **agent registration card number** of the medical marijuana establishment agent; and
- f. The **registration certificate number** of the medical marijuana establishment.

As with the patient verification workflow, EAGLE ONE's ERP will automatically send this data to the state system, via API, once integration is available.

5.2.2 Privacy & Security of Data Storage

As required by law and in pursuit of patient confidence and privacy, Eagle One will ensure that its system stores all necessary data on accredited and potentially HIPAA-compliant servers (if determined necessary). Eagle One and its information technology providers will maintain stringent physical security of servers, maintain access control restrictions to the data and servers, and protect patient identifiable information through encryption. All patient-record data access will be managed based on tiers of "user role" and associated permissions: username/password access will be required for each user accessing the system, with all passwords being tested for strength and subject to regular renewal.

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Patient records will be properly and securely maintained for at least six (6) years from their date of last transaction or reference.

5.3 ERP – Inventory Management

The facilities inventory control process includes tracking of all incoming raw and processed materials, including the name and state license number of the cultivator, the testing lab data (as applicable), the strain, the supplier's product tracking identification data, and bill of lading from the transport Eagle One. All incoming raw materials will be assigned a batch number that can be cross referenced to the above referenced data and stays with the product through the manufacturing process and to final sale to distributors and/ or retailers. All outgoing product will be tracked by SKU, batch number, invoice, and shipping documents; unless the product is not for sale and will be destroyed. The process for documenting product to be destroyed is described separately in this manual.

The methodologies for tracking and Inventory Control of Medical Marijuana and Medical Marijuana-Infused Product may be subject to requirements imposed by the State Licensing Authority and will be adjusted accordingly as required.

- Inventory Generation & Tracking
 - Classifications for type and caliber of Product
 - Price and profile designations, including pricing
 - Assign unique barcodes or use existing product barcodes
 - Transfer inventory within facility to ensure real-time, to-the-room accuracy of information
 - Create virtual labels and identifiers...then print as needed.
- Inventory data be accessed based on an employee's site permissions, allowing management to provide rules-based access to only selected inventory at selected sites to a specific employee.
 - Mobile devices enabled – perform stocking-actions directly on the device or print stock-takes for manual paper then PC entry
- Purchase Order creation and receipt
- Traceability functionality records and tracks details regarding supplier, supply date range, supplier batch details, purchase order number and more
 - Balance of all inventory is available at all times, filtered according to demand.
- Re-stocking and supply level alerts generated when an inventory item has a low balance, the alert level is individually set for each inventory component
- Staff authorizations as "Patient Care Agents"
 - Add employees and vehicles for the built-in transportation features
 - Add vendors

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- Financials
 - Create and track records of accounts receivable/payable, including invoicing for actual transactions
 - Manage and record inbound and outbound transfers
 - Audit Inventory, particularly in terms of accurate reportage on Product volumes and state of preparedness.
 - Create different inventory types
 - Tax collections/tracking
 - Set price points

5.3.1 Monthly and Annual Inventory Reviews

The Eagle One Dispensary team will conduct physical inventory counts of medical marijuana products monthly. Eagle One's Quality Assurance team will independently audits of physical inventory of medical marijuana products vs. reported stock in the Seed to Sale Inventory Control system on at least an annual basis.

EAGLE ONE will produce reports from its Seed to Sale Inventory Control system that document inventory audits and include the following information at a minimum:

- The date of the inventory audit
- A summary of the inventory audit findings and,
- The employee identification numbers, names, titles or positions of the individuals who conducted the inventory audit

This information will be made available internally and to the Department upon request.

Eagle One's STS+POS system is designed to incorporate several checks and balances to carefully manage Eagle One's medical marijuana product inventory and prevent discrepancies. The system will provide a centralized point for all inventory in EAGLE ONE's Dispensary facilities. The following system features will be included to assist in identifying inventory discrepancies in a timely manner:

- No negative inventory values will be allowed in the system. Any transaction that would cause an inventory value to become negative will be placed on hold and will be investigated by Eagle One's Quality Assurance team.
- The system will provide audit and control reports to identify all transactions and a validation point to determine if a stock discrepancy exists. All inventory adjustments by an Eagle One employee will be logged identifying the individual that made the adjustment and the time it was done.

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5.3.2 Investigating Inventory Discrepancies

The Seed-to-Sale Inventory Control system will provide a de facto chain-of-custody tracking mechanism to identify any time medical marijuana products are added or subtracted to EAGLE ONE's inventory throughout their lifecycle.

Should any material reduction in the amount of medical marijuana products in the facilities inventory occur, the EAGLE ONE Quality Assurance team will investigate to determine where the loss has occurred. The investigation and its results will be reported to the Director of Security who will then take and document corrective action.

If a reduction in the amount of medical marijuana products in EAGLE ONE's inventory is due to suspected criminal activity by an employee, the Quality Assurance team will report the suspected employee to the Director of Security. They will take appropriate action which includes notification of the Department and law enforcement within 1 business day of the suspected loss.

Follow-up reports will be submitted concerning any significant discoveries relating to the incident. All incidents must be formally closed and signed off upon by the Director of Security.

If the discrepancy requires modification to existing standard operating procedure(s), EAGLE ONE will revise the procedure, making sure it is checked against existing procedures for anomalies, duplications, conflicts, and ensure that it adheres to current regulatory requirements. The revised SOP will be sent for review and approval by an internal review committee. Once approved, the procedure will be implemented and all affected Department Managers will be notified to train their teams on the new procedure.

An Audit Report will be written at the completion of each standard operating procedure audit which will include the disposition of the audit and summary findings. The final audit report will include: an audit checklist, all relevant supporting documentation, Corrective and Preventive Actions ("CAPAs") implemented and an executive summary and conclusion. All completed audits will be maintained as records and will be available for review by the Department upon request.

5.4 Damaged, Defective, Expired or Contaminated Products

EAGLE ONE will establish standard operating procedures for the management of medical marijuana product that is damaged, defective, expired, or contaminated. Such procedures will include specific steps for effecting recalls, market withdrawals, and returns. These procedures and mechanisms will enable the secure recovery and disposition by an EAGLE ONE Dispensary of any medical marijuana products that may pose any risk to patient or public health.

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5.4.1 Complaints and Serious Adverse Events

If an EAGLE ONE Dispensary receives a complaint or report of a serious adverse event from a patient, caregiver or practitioner that indicates the possibility of damaged, defective, expired, or contaminated medical marijuana products, it will notify the Department immediately of the complaint.

EAGLE ONE will then utilize the patient-dispensation and inventory data provided in the STS+POS to investigate the claim and identify the licensed Grower/Processor that manufactured the medical marijuana product at issue. Upon such identification, EAGLE ONE will notice the licensed Grower/Processor of the report of an adverse event or complaint and request that the grower/processor investigate the report and share all relevant findings with EAGLE ONE and the Department.

During any investigation of a reported complaint or serious adverse event, all medical marijuana products currently held in EAGLE ONE inventory which are subject to the investigation or reasonably implicated by the complaint/event will be placed in a secure, quarantined storage area. A 'Hold' will be placed on further distribution of the medical marijuana product in STS+POS system pending conclusion of the investigation. None of the product in question will be dispensed while an investigation is being conducted.

EAGLE ONE's STS+POS system will be used to identify specific product lots involved in the claim while transport manifests will be utilized to track the distribution of the specific medical marijuana product in question across EAGLE ONE's Dispensary facilities and, ultimately, to any given patient or caregiver to whom the product has been dispensed. This traceability will be made possible based upon the series of batch identifiers and barcodes as well as lot numbers associated with the product in question. These unique identifiers will allow for traceability to the qualifying patient and/or caregiver level.

5.4.2 Voluntary Recalls and Withdrawals

If a Grower/Processor imposes a voluntary recall or market withdrawal of a given medical marijuana product, the process will be conducted in collaboration with EAGLE ONE Dispensaries who will make contact with certified patients or designated caregivers that have received the product in question. A voluntary recall or market withdrawal may occur when product use or exposure is not likely to cause adverse health consequences, but has other quality control issues that recommend full information to the impacted patient or caregiver.

5.4.3 Mandatory Product Recalls

If a Grower/Processor imposes a Mandatory Product Recall due to a reasonable probability that product use or exposure may cause temporary reversible health consequences, serious adverse

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health consequences, or death, then EAGLE ONE will promptly investigate the scope of disposition and immediately contact each individual certified patient or designated caregiver that has received the product.

EAGLE ONE will immediately confirm the Recall with the Department. In addition, all medical marijuana products subject to the Mandatory Product Recall that are currently held in EAGLE ONE inventory will be placed in a secure, quarantined storage area. These products will not be disposed of or returned to the licensed Grower/Processor that manufactured them without prior approval of and coordination with the Department.

As part of its Mandatory Product Recall standard operating procedures, EAGLE ONE will assign a Recall Coordinator to facilitate all activities related to the recall with the Grower/Processor. This individual will be responsible for following defined recall procedures and coordinating:

- All internal Eagle One activities related to the Recall
- Identification and isolation of the recalled medical marijuana products in Eagle One Dispensaries
- Following defined communications protocols to:
 - Contact and inform each Eagle One Dispensary that received recalled or withdrawn product and provide a complete product list including the brand, batch number(s) and expiration dates of the medical marijuana product in question
 - Distribute information sheets provided by the Grower/Processor to inform patients and caregivers of the product recall
- Accepting the recalled medical marijuana product from patients and caregivers to return to the Grower/Processor
- Updating the Seed-to-Sale Inventory Control system to reflect receipt of recalled product including the following data:
 - The amount of recalled medical marijuana products received by the Dispensary, including types, forms, batches and lots, if applicable, by date and time
 - The total amount of recalled medical marijuana products returned to the Dispensary, including types, forms, batches and lots, if applicable
 - The name(s) of the Recall coordinators
 - From whom the recalled medical marijuana product was received
 - The reason for the Recall
 - Any other information required by the Department as specified in a written request to Eagle One or in defined regulations
- Quarantine and storage of the recalled product
- Managing the disposal return of the recalled product to the manufacturing Grower/Processor in conjunction with the support and oversight of the Department

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As part of the mandatory recall process, Eagle One's Recall Coordinator will instruct employees at all Eagle One Dispensaries to immediately cease distribution of the medical marijuana product in question and to quarantine any withdrawn or recalled product for return to Eagle One. Eagle One will instruct the Dispensary Managers to contact patients and caregivers and instruct them to cease using the product and return it to the Dispensing facility for reimbursement.

Eagle One will coordinate secure return of all recalled/withdrawn medical marijuana from patients or caregivers, to the Eagle One, and then to the licensed Grower/Processors for additional investigation and proper disposal. Prior to transporting any quarantined materials for destruction, a transport manifest with the material or product name(s), quantities, batch numbers and any other required information will be prepared accurately documenting every medical marijuana product to be included in the shipment.

5.4.4 Returns

It is Eagle One's policy to only accept medical marijuana products returned by a patient or designated caregiver at our licensed Dispensary facilities based upon a voluntary or mandatory recall. Returns will not be accepted due to issues such as customer dissatisfaction with a given medical marijuana product.

As described above, Eagle One will coordinate secure return of all recalled medical marijuana products with licensed Dispensaries.

5.4.5 Financial Reimbursement

It is Eagle One's policy to only accept medical marijuana products returned by a patient or designated caregiver at a licensed Dispensary agent's facilities. Financial reimbursement will be offered for any medical marijuana products that have been returned due to a voluntary or mandatory recall.

Eagle One will be compensated by the Grower/Processed product manufacturer for any returned medical marijuana products subject to a recall.

5.4.6 Eagle One's Return of Medical Marijuana Products to Grower/Processors

If an Eagle One Dispensary discovers that a medical marijuana product has been damaged, is defective, has expired or has become contaminated during the transfer from Grower/Processor into Eagle One's possession, it will be held in a secure quarantine area in the Dispensary facility until it can be returned to the licensed Grow/Processor that manufactured the product.

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Courtesy notifications will be sent to EAGLE ONE Dispensaries that may possess medical marijuana products that have past their expiration date or have otherwise been deemed unusable.

All products awaiting return will be updated in the Seed-to-Sale Inventory Control system to reflect this status. Once products have been returned to a licensed Grow/Processor, Inventory Control will be updated to reflect their returned status.

6 QUALITY ASSURANCE, PACKAGING, & LABELING

6.1 Product Quality Assurance and Quality Controls (“QA/QC”)

6.1.1 QA/QC Protocols

All batches of marijuana or marijuana products received by EAGLE ONE, whether received in bulk or in pre-packaged increments, will be required to have a Certificate of Analysis associated to the specific batch and registered within the seed-to-sale tracking system inventory. The Certificate of Analysis (“COA”) will include the following, the specific requirements of which are subject to change due to implementation of local rules and the MCRSA:

- (a) Cannabinoid Profiling: All batches of marijuana within Eagle One’s inventory will require quantification of THC, CBD, and CBN cannabinoids.
- (b) Chemical Residue Screening: Verification of the presence or absence of chemical pesticides and fungicides for all marijuana or marijuana products.
- (c) Biological Screening: Verification of the presence or absence of fungi, yeasts and bacteria will be required for all marijuana products.

If the marijuana product is of such type where the following information would be relevant, then the Certificate of Analysis or product label will also include:

- (d) Nutritional & Cannabinoid Labeling: All ingestible and topical products will require accurate testing and labeling that clearly identifies the product’s ingredients, cannabinoid content, and single serving use amount.
- (e) Volatile Solvent Extracted Products: the COA for any marijuana products developed utilizing any volatile solvent methodologies will verify the absence of any harmful residual solvent.

6.1.2 Generally

In addition to meeting all State and local requirements for product quality control as set forth herein, EAGLE ONE will continually revise, implement, and audit standard operating procedures

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regarding quality assurance and quality control. Such SOPs will always include the following minimal elements:

- (a) Samples of all regulated materials will be screened and tested by an independent State licensed and/ or locally permitted licensed laboratory for pesticides, mold, and other undesirable qualities
- (b) Documentation of all lab test results will be kept on file

6.2 Packaging Materials

EAGLE ONE will only package or re-sell products in individual child-resistant packaging that is in accordance with 16 C.F.R. § 1700 or the standards specified in Humboldt county and California state regulations. Depending on the product lines obtained by Eagle One, marijuana-infused products in solid or liquid form will be packaged in 4 millimeter thick (or greater) plastic with no easy-open characteristics or bottles using a metal crown cork- style bottle cap. All packaging materials will protect the contents from contamination and will not impart any toxic or deleterious substance to the product.

6.3 Packaging at Dispensary

6.3.1 Presentation to the Patient

All usable marijuana and marijuana Products will be stored behind a counter or other barrier. Product samples will be packaged in a sample jar and protected by a plastic or metal mesh screen, and will not contain more than 3 1/2 grams of usable marijuana.

6.3.2 Periodic Purchase Limits

Eagle One will audit and enforce California's limit: *no more than four ounces of marijuana shall be sold to a patient during a period of fifteen consecutive days, and no more than eight ounces of marijuana shall be sold during a period of thirty consecutive days (or the equivalent weights in marijuana-containing products).*

6.4 Labeling & Informational Materials

Eagle One will maintain detailed data regarding its Product, and will communicate this information through packaging labels and reference materials (such as brochures). EAGLE ONE's objective is to provide Patients with relevant and easy-to-grasp facts regarding their medicinal marijuana, so as to ensure that vital decisions are made based on meaningful information.

Written materials will use a 12-point font in standard print.

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6.4.1 Supplemental Materials

Eagle One will make available a range of supplemental materials (such as brochures), either authored by or in collaboration with the cultivation centers and processing operations, which convey important information about the provenance and characteristics of its Products. Such materials will be made available to Patients by the dispensary at the time of sale. These materials will:

- (a) disclose any pesticides applied to the marijuana plants and growing medium during production and processing;
- (b) identify the techniques and chemicals and compounds used for any form of extraction or concentration;
- (c) Assert specific warnings, as follows:
 - i. "Warning: This product may have intoxicating effects and may be habit forming. Smoking is hazardous to your health."
 - ii. "There may be health risks associated with consumption of this product."
 - iii. "Should not be used by women who are pregnant or breast feeding."
 - iv. "For use only by the person named on the label of the dispensed product. Keep out of the reach of children."
 - v. "Marijuana can impair concentration, coordination and judgment. Do not operate a vehicle or machinery under the influence of this drug."
 - vi. If applicable, "This product contains or is infused with marijuana or active compounds of marijuana."
 - vii. If applicable, "Caution: When eaten or swallowed, the intoxicating effects of this drug may be delayed by 2 or more hours."

6.4.2 Labels for Wholesale Product

EAGLE ONE will receive product lots from cultivation centers or processing facilities, and will require that such materials are labeled with accurate information and attestations regarding the products, such as:

- (a) EAGLE ONE name and its medical marijuana establishment registration certificate number;
- (b) The lot number of the product;
- (c) The date of harvest;
- (d) The date of final testing;
- (e) The date on which the product was packaged;
- (f) The cannabinoid profile and potency levels and terpenoid profile as determined by the independent testing laboratory;
- (g) If the product is perishable, the expiration date; and

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(h) The quantity of marijuana contained in the product unit.
This information will be displayed in a form substantially similar to the following:

JT'S NURSERY		
Certificate Number: 123 456 789 001 0001		
Lot Number: 1234		
Harvested on: 01/01/2013		
Final Testing Date: 01/15/2013		
Packaged on: 01/17/2013		
Best if used by: March 17, 2013		
16.7% THC	1.5% CBD	0.3% CBN
Myrcene 5.6 mg/g	Limonene 5.1 mg/g	Valencene 3.5 mg/g
Net Weight: 2 lbs.		

6.4.3 Labels for Dispensary Product to determine patient's dosage and comprehensive testing analysis of product.

Eagle One will prepare and affix labels for each retail-unit product, which will display the following:

- (a) The cultivation center or processor business or trade name and registration certificate number;
- (b) The lot number—or, if multiple lots were used to create the specific item, the complete list of lots comprising the product,
- (c) The date and quantity dispensed, including the net weight measured in ounces and grams or by volume, as appropriate.
- (d) The name and registry identification card number of the patient and, if applicable, the name of his or her designated primary caregiver.
- (e) The name and address of the medical marijuana dispensary.
- (f) The cannabinoid profile and potency levels and terpenoid profile.
- (g) A warning that states: "This product may have intoxicating effects and may be habit forming."
- (h) The statement: "This product may be unlawful outside of the State of California."

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- (i) The date on which the marijuana was harvested, or, if applicable, the date on which the Product was manufactured.

Additionally, for infused or edible products:

- (j) If the product is perishable, a recommended "use by" date,
- (k) The total milligrams of active cannabinoids and terpenoids in the product, as provided by the independent testing laboratory that tested the product.
- (l) A list of all ingredients, including nuts and all major food allergens as identified in 21 U.S.C. §§ 343.
- (m) A warning that states: "Caution: When eaten or swallowed, the intoxicating effects of this drug may be delayed by 2 or more hours."
- (n) If a marijuana extract was added to the product, a disclosure of the type of extraction process and any solvent, gas or other chemical used in the extraction process, or any other compound added to the extract.

The label will appear in a form substantially similar to:

Joe's Plant Emporium	Cert.#: 123 456 789 001 0001
Lot#: 1234	Harvested: 01/01/2013
Dispensed to: John J. Smith #1234987 on 11/27/2013	
by	
We Care Dispensary	
123 Main Street, Carson City, NV 89701	
WARNING:	
This product may have intoxicating effects and may be habit forming.	
16.7% THC 1.5% CBD 0.3% CBN	
Myrcene 5.6 mg/g Limonene 5.1 mg/g Valencene 3.5 mg/g	
Net Weight: .25 ounces (7 grams)	
<u>This product may be unlawful outside the State of Nevada.</u>	

6.5 Quality Assurance Review of Packaged Materials

EAGLE ONE will regularly review products in inventory in storage and at the point of sale to a purchaser or Patient in order to:

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- (a) Examine packaged and labeled products during finishing operations to provide assurance that the containers and packages have the correct labels;
- (b) ensure that the samples are visually examined for correct labeling; and
- (c) Record the results of the examinations performed in the applicable production or control records.

7 TRANSPORTATION

7.1 General Transportation Principles

All medical marijuana deliveries will be received at the facility from a State licensed and/ or locally permitted licensed transport Eagle One; and all Medical Marijuana-Infused Products will be transported to State licensed and/ or locally permitted licensed Wholesale/Distribution companies by a State licensed and/ or locally permitted licensed transport Eagle One.

Transportation Manifests will be used to track movement of all marijuana and marijuana products outside of the dispensary, including the shipping and receiving agent, quantities of product, make/model of vehicle, departure time, and estimated arrival time. Alerts may be established to provide information to management on late shipments.

All Applicant vehicles will be outfitted with Global Positioning System ("GPS") transmitters. The transportation plans and GPS travel logs of appropriate Applicant agents and the logistics of Applicant's delivery schema will be periodically reviewed to ensure compliance with this transportation restriction.

The SOPs for receiving shipments, confirming accuracy or reporting discrepancies, and processing items into inventory provide detail and checklists for the following protocols:

- On the day prior to delivery, Applicant will receive, by a direct and secure licensee-to-licensee transmission, a manifest from the shipping Licensee indicating the next day's delivery.
- When the transporting agent carrying the delivery is approximately ten (10) minutes from arrival, the shipping licensee will notify Applicant's staff and Security team.
- The delivery vehicle will be directed to a secured parking area
- Applicant agent will access the electronic manifest in Applicant's enterprise resource planning ("ERP") system;
- Applicant agent will confirm the identity of the transportation agent and match this ID against the ERP system;
- Transportation agent will provide a copy of the electronic manifest for the shipment;
- Receiving agent will review the shipment to ensure that

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- packaging is secure, undamaged, and appropriately labeled;
- packages are labeled as described in the electronic manifest; and
- contents match those described in the electronic manifest;
- Receiving agent will record in the manifest record in the ERP:
 - their confirmations of shipment review;
 - the signature and ID number of the transportation agent;
 - the date and time of change of custody for the shipment;
- Applicant agents will then:
 - Enter products into the ERP inventory management system;
 - Segregate received items from general inventory pending further inspection.

Any discrepancy in the shipment will be:

- recorded in the manifest record within the ERP
- investigated and reported via an Incident Report Form;
- reported to the shipping party, within 1 business day, in order to finalize the post-delivery affirmations; and
- escalated to Applicant's Chief Compliance Officer and potentially reported to the Commission in accordance with

Applicant will record in its enterprise resource planning ("ERP") system the following data relating to shipment-receiving:

- Shipping licensee name and address;
 - Shipping licensee's shipment identification number;
 - Shipping licensee package-preparer agent name;
 - Receiving licensee name and address;
 - Weight and description of each individual package;
 - Total number of individual packages; and
 - Any handling or storage instructions.
1. *The shipping Licensee's transporting agent will be greeted upon arrival and instructed by Applicant's Security personnel to park the delivery vehicle in a secured area. Applicant will (a) request verifying identification from the transporting agent, (b) create a digital record of the agent's state issued identification and marijuana transport agent licensing information, (c) input this digital record into Applicant's enterprise resource planning ("ERP") and state-reporting system.*
 2. *After verification and recordation of the transporting agent ID, the Dispensary Manager and the transportation agent will move into the secured staging area. In this secured area, the Dispensary Manager will conduct all required inspections of packaging to ensure that it is*

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secure, undamaged, and appropriately labeled. The tamper evident shipping tape will also be inspected. This inspection event will be logged on to the intake checklist.

3. *The receiving Dispensary Manager will assess the shipment to confirm that it is labeled as described in the electronic manifest, including:*

- *Date/time that the package was sealed;*
- *Name and signature of the preparing/sealing registered agent;*
- *Shipping licensee name and address;*
- *Shipment identification number;*
- *A description of each item; and*
- *Applicant's name and address as receiving licensee.*

After all packages within a shipment have been inspected and deemed (a) compliant and (b) matching to all details of the manifest, then final weights and counts will be taken to ensure the shipment contains everything as described on the electronic manifest.

When transportation of medical marijuana is required, Applicant will only use registered dispensary agents (a) who are licensed as a motor vehicle operator by the State of [STATE] and (b) whose driving records are clean. Applicant will record all details associated with the delivery, including the transportation agent's name, driver license number, and make/model and license plate number of the transporting vehicle in its enterprise resource planning ("ERP") system. Any vehicle to be used for transportation of marijuana will be outfitted with Global Positioning System ("GPS") transmitters, and departure and expected arrival times will be tracked. The transportation plans and GPS travel logs of appropriate Applicant agents and the logistics of Applicant's delivery schema will be periodically reviewed to ensure compliance with this transportation restriction.

7.1.1 Transport Notices

Any movement of Product will be accompanied by the required notification into the software traceability system. The transporter will enter into the ERP system:

- (a) the type and amount of product being transported,
- (b) the name of the transporter, and
- (c) the time of departure and expected delivery.

The receiver of Product will enter the amount of product being received.

7.1.2 Who May Transport

All EAGLE ONE drivers are instructed that, with respect to operating a Eagle One or personally owned vehicle for EAGLE ONE business and/or activities, they must:

- (a) Comply with all State, local, and traffic laws at all times.

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- (b) Maintain a current, valid driver's license—and the affirmative obligation to notify EAGLE ONE of any moving violation, or other violations of motor vehicle law which may affect their driver's license, insurability, or restriction or suspension of their driver's license.
- (c) Ensure that the driver, and any passengers riding in any vehicle, wears seat belts/shoulder harnesses, even if air bags are available.
- (d) Never operate any EAGLE ONE vehicle or any personal vehicle driving on EAGLE ONE business while impaired, including:
 - i. under the influence of intoxicants, or .
 - ii. by illness, fatigue, injury, prescription medication.
- (e) Never text-message or conduct non-hands-free phone conversations while driving.
- (f) Never allow unauthorized persons to ride in Eagle One vehicles.
- (g) Maintain proper security for Eagle One vehicle and its contents. The vehicle engine must be shut off, ignition keys removed, and vehicle doors locked whenever the vehicle is left unattended. This is especially important with radio remote broadcast vehicles - these vehicles are highly visible, perceived as targets by thieves, and contain valuable, portable equipment. Be aware of remote broadcast vehicle heights and clearances.
- (h) Promptly report mechanical difficulties or repair needs to management.
- (i) Record remote broadcast vehicle check-out and check-in information on proper forms as specified Eagle One.
- (j) Always stow all loose items and equipment before moving the vehicle.
- (k) Use headlights 2 hours before sunset and until 2 hours after sunrise, or during inclement weather or at anytime when a distance of five hundred (500) feet ahead of the vehicle cannot be clearly seen.

7.1.3 Transport Routes Must Be Direct

EAGLE ONE vehicles transporting marijuana will go directly from Eagle One to the receiving licensee and will not make any unnecessary stops in between, except to other facilities receiving product.

7.1.4 EAGLE ONE's Broad Commitment to Compliance

Any EAGLE ONE driver, including volunteers or contracted service providers, who becomes aware of a situation in which he or she believes Eagle One's legal or ethical responsibilities are being violated by another designated driver and/or purchaser licensee, or feels pressured to violate the law or Eagle One's ethical responsibilities regarding the same, is required to notify Eagle One of that concern.

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7.2 Packaging & Labeling for Transportation

The Product will be stored in the vehicle in a locked, safe, and secure storage compartment that is secured to the inside body/compartment of the vehicle transporting the Product.

Product is transported in sealed packages, compliant with NRS and NAC. Such sealed packages or containers will not, under any circumstances, be opened during their transport.

Any and all Product to be delivered to licensed producers and/or dispensaries will be accompanied by a current and accurate Transportation Manifest, which will record:

- (a) the type and amount of product being transported,
- (b) the name of the transporter, and
- (c) the time of departure and expected delivery

7.3 Transport Tracking & Record Keeping

7.3.1 Transport - Delivery

Before transporting any Product, Eagle One will enter into its ERP transaction system:

- (a) the type of marijuana;
- (b) the amount of marijuana and/or weight of the Products being transported;
- (c) the name of the transporter/designated driver;
- (d) times of departure; and
- (e) expected delivery dates and times.

7.3.2 Receipt

EAGLE ONE will employ best efforts to ensure that the receiver enters into the traceability system the amount of product being received and the date and time of the receipt.

7.3.3 Record Keeping

EAGLE ONE will keep, securely and accessible at Eagle One premises, all transportation-related records for a minimum of three (3) years. This includes:

- (a) transportation manifests,
- (b) order placements,
- (c) delivery receipts,
- (d) and notifications.

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7.4 Transportation Security

EAGLE ONE's dedication to the highest level of security, public safety, and smooth operation of [STATE]'s medical marijuana system may recommend reliance on contract security escorts for product shipments.

EAGLE ONE's complete protocol for Security, including Transportation Security issues, can be found in EAGLE ONE document titled "ADVANCED PROPAGATION SECURITY GUIDELINES AND POLICIES."

7.5 Event Reporting Requirements

Any vehicle accident that occurs during Product transportation must be reported (by any EAGLE ONE employee, volunteer, or contracted service provider with knowledge of such) to the proper EAGLE ONE designee within 2 hours after the accident occurs.

Any loss or theft of Product or EAGLE ONE finances must be reported (by any EAGLE ONE employee, volunteer, or contracted service provider with knowledge of such) to the proper EAGLE ONE designee *immediately* after the individual becomes aware of the loss or theft.

The EAGLE ONE will immediately report the loss or theft to the appropriate law enforcement agency and to the Division.

8 BUILDING OVERVIEW

8.1 Private Property & Availability to Authorities

EAGLE ONE welcomes any inspection of the Medical Marijuana Center by the local fire department, building inspector, or code enforcement officer to confirm that no health or safety concerns are present. It is understood that the inspections may result in additional specific standards to meet local jurisdiction restrictions related to Medical Marijuana. An annual fire safety inspection may result in the required installation of fire suppression devices, or other means necessary for adequate fire safety.

8.2 Hours of Operation

Hours of operation will typically be from 7 AM to 7 PM; however, during periods of seasonally high workload, the hours of operations within the facility may increase to 24 hours per day. During such extend hours of operations, shipping, receiving, and any other traffic or noise generating activities will be limited to normal working hours.

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8.3 Map

Please see attached architectural packet.

8.4 Floor Plan

Please see attached architectural packet.

8.5 Structures & Land Uses Within a 600-foot Radius

Please see attached architectural packet. *Pursuant to CMMLUO 55.4.11 d.*

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9 HEALTH, SAFETY, & SANITATION

9.1 Employee Health, Safety, & Sanitation Protocols

9.1.1 Regular Team Communications & Meetings

EAGLE ONE will communicate with Dispensary employees regarding safety and health issues on at least a quarterly basis or as needed. Dispensary agent awareness of potential health and safety hazards is critical to maintaining a safe work environment. Knowledge of how to control such hazards will aid in the prevention of injuries, illnesses and accidents in the workplace, and quality and cleanliness of the products. Safety issues will be included in regular safety meetings conducted by dispensary management on a periodic basis. During these meetings, management will discuss with Eagle One employee's issues including:

- Causes of recent accidents or injuries and the methods chosen to prevent similar incidents in the future.
- Any health or safety issues considered by the manager to require reinforcement.
- Any concerns, observations and suggestions by employees regarding workplace health or safety.

9.1.2 Indications of Health or Safety Issues

Eagle One will institute standard operating procedures which require that any person who, by medical examination or supervisory observation, is shown to have, or appears to have, an illness, open lesion, including boils, sores, or infected wounds, or any other abnormal source of microbial contamination for whom there is a reasonable possibility of contact with preparation surfaces for medical marijuana products shall be excluded from any operations which may be expected to result in such contamination until the condition is corrected.

The Eagle One Dispensary management team will monitor the health of all employees. In the event the Dispensary Manager believes an employee responsible for the handling of medical marijuana products is ill, they will terminate the employee's shift immediately. If upon return to work, Eagle One still suspects the employee is ill, he or she will require the employee to obtain a physician's release to return to work in the facility.

An Eagle One dispensary agent is required to report to a supervisor any personal health condition that might compromise the cleanliness or quality of the medical marijuana the dispensary agent might handle including an illness, open lesion, including boils, sores, or infected wounds, or any other abnormal source of microbial contamination. Employees that display any of the symptoms noted above will be instructed to self-report to their direct manager all such health conditions to prevent any adverse effect on a product or patient.

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Employees who observe any of the symptoms noted above related to co-workers will be instructed to report their observations to the Quality Assurance team for follow up with the employee in question.

All reports are to be immediately communicated to the on-duty dispensary manager. If it is determined that an Eagle One agent has a health condition that may adversely affect the safety or quality of the marijuana products at our dispensary, that agent will be prohibited from having direct contact with any marijuana or equipment until the manager determines that the health condition of the agent will not adversely affect the cleanliness or quality of any products.

Sufficient and accessible infection control supplies (e.g. hand-hygiene products, tissues and receptacles for disposal) are provided in all facility areas. Surface cleaning practices in common areas will be increased as necessary.

9.1.3 Training in Sanitation & Safety

Eagle One will provide training to each employee regarding general safety procedures and hazards or safety procedures specific to that employee's work assignment. Training occurs upon hire, as well as whenever Eagle One is made aware of a new or previously unrecognized hazard, or any Eagle One Management Team leader believes that additional training is necessary.

9.1.4 Employee Sanitation SOPs

Any EAGLE ONE employees working in direct contact with medical marijuana shall comply with the restrictions on food handlers specified in *California State*. Eagle One employees shall conform to standard sanitary practices while on duty as outlined below.

The following standard sanitation protocols will be followed and implemented in Eagle One's Dispensary facilities. These written procedures, schedules and logbooks will include:

- Assignment of responsibility for cleaning equipment and specific areas of the facility
- Protection of clean equipment from contamination prior to use
- Inspection of equipment for cleanliness immediately before use
- The use of chemicals that fall under relevant Material Safety and Data Sheets ("MSDS", now commonly referred to as Safety Data Sheets, "SDS") regulations based on the recommendations and requirements for handling and use contained with the chemical's respective MSDS/SDS.
- Instructions for employee safety and cleaning including the following:
 - All employees shall wash hands before starting work and any other time when their hands may have become soiled or contaminated prior to dispensing medical marijuana products to a patient or caregiver.

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- All employees shall remove all unsecured jewelry, hand jewelry and other objects that might fall into products that are manipulated by hand. If hand jewelry cannot be removed, it must be covered by material that is maintained in an intact, clean, and sanitary condition and that effectively protects products against contamination.
- Personal belongings will not be allowed in areas where medical marijuana products are present. All personal belongings should be stored in the employee locker room.
- There will be no eating food, chewing gum, drinking beverages, or using tobacco products in areas where medical marijuana products are stored or dispensed.

9.1.5 Employee Clothing

EAGLE ONE requires that employees engaged in the Dispensing of medical marijuana products wear clean clothing or an issued uniform appropriate for the duties they perform. Employees will be trained and required to practice good sanitation and health habits.

9.1.6 Hand-washing and Lavatories

All personnel shall practice good sanitation and health habits. Employees must maintain adequate personal cleanliness standards and must wash their hands thoroughly in an adequate hand-washing area before starting work and at any other time when hands may have become soiled or contaminated.

Hand-washing facilities with running water at an appropriate temperature will be in the Dispensary facility where good sanitary practices require employees to wash and sanitize their hands. Effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices will be provided.

Lavatories will be installed in Eagle Ones Dispensary facilities and will be sanitized and maintained daily. Lavatories will be made available for both employee and visitor use with the latter being in a non-limited access area.

9.2 Prevention of Contamination of Medical Marijuana Products

Eagle One will establish a multi-faceted approach to prevent contamination in its medical marijuana products. Standard operating procedures designed to maximize safety for employees and minimize potential contamination will be utilized within its Dispensary facilities. Employees will be properly trained on quality control measures and protocols including:

- Visual inspection of all items produced for any contaminants and foreign objects (plant material, hair, debris, etc.)
- Following all sanitary measures and procedures

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- Ensuring that all persons working in direct contact with medical marijuana products shall conform to documented personal hygiene practices while on duty.

All operations in the receiving, inspecting, transporting, segregating, storing and dispensing of medical marijuana products shall be conducted in accordance with EAGLE ONE authored and regularly audited sanitation protocols.

Eagle One will ensure that any permissible preparation or re-packaging of medical marijuana products is conducted in a secure space specifically designed for preparation and packaging located within the secure operations zone. The designated area will include a workspace that can be sanitized and is only for the preparation or repackaging of medical marijuana. As part of orientation, training for all staff members will include strict instructions that the designated area is for preparation and re-packaging of medical marijuana only. As a reminder, we will post signs at the entrance and in the designated areas stating: "This area is used exclusively for the preparation and re-packaging of medical marijuana." We have special protocols for cleaning and sanitation in these areas, including employee hand washing and hygiene.

Preparation of waste shall be segregated within the processing center to prevent any cross-contamination with any product processing areas. Waste will be properly removed and the standard operating procedures for waste disposal will be maintained in an adequate manner so that they do not constitute a source of contamination in areas where medical marijuana products are exposed.

9.3 Facility Sanitation Resources & Design

9.3.1 Generally

Eagle one will ensure that its Dispensary facilities are continuously in proper working condition and that they are maintained on a regular basis. This includes all floors, walls, and ceilings in Dispensary facilities. Proper and routine maintenance will provide a basis for employee safety and efficiency and will reduce any potential contamination that might otherwise occur.

All Eagle One facilities will have a water supply sufficient for their operations. This supply will be derived from a public water system capable of providing a safe, potable and adequate supply of water to meet the operational needs of our employees and the overall facility.

9.3.2 Storage of Chemicals

Eagle One does not currently intend to handle any hazardous materials in amounts requiring a Hazardous Material Business Plan ("HMBP").

If EAGLE ONE operations do involve the handling of any non-exempt hazardous materials, it will register its hazardous materials with the local agency using the Hazardous Materials/Waste

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Registration Form, in order that any relevant agency could evaluate the storage or use and give notice of any permits or fees that apply.

Toxic cleaning compounds, sanitizing employees, solvents used in the sanitation of EAGLE ONE's Dispensary facilities shall be labeled and stored in a manner that prevents contamination of medical marijuana products, and in a manner, that otherwise complies with other applicable laws and regulations.

Separate, dedicated areas will be defined for the storage of cleaning supplies, sanitizing employees and solvents used in EAGLE ONE's Dispensary facilities.

9.3.3 Waste Mitigation and Management Areas

A compactor and a dedicated waste dumpster will be used for sanitation and waste mitigation purposes in EAGLE ONE's facility. One set of doors to the waste mitigation room will be located within the interior of the room, and the other set of doors penetrate through an exterior wall of the building and can be accessed from the outside from within a dedicated security fenced area with both the compactor and the dumpster.

While the default controlled waste management protocol is to mix green waste (any medical marijuana plant material) with inert material in a 50:50 ratio; Eagle One may also review potential methods for composting green waste in the future.

This area will be cooled and heated via an independently controlled HVAC system independent of the other spaces in the facility. Standard environmental conditions for an office occupancy are achieved with a system with dedicated supply/exhaust. Additional filters are used on all exhaust air.

9.3.4 Quarantine Area

Eagle One will establish processes and a secure quarantine area for separating non-conforming medical marijuana and medical marijuana products that require disposal/destruction.

Any individual batch or batches of medical marijuana products held under quarantine will not be transported, distributed or dispensed by the Eagle One unless approval is obtained from the Department.

Once directed by the Department, any such products will be properly destroyed within 24 hours of receipt of notice in accordance with EAGLE ONE's standard operating procedures relative to controlled waste management. In some cases, such as mandatory recalls, the Department may observe the destruction of medical marijuana products.

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9.4 Facility Protocols

9.4.1 Facility Sanitation SOPs

Eagle One will implement standard operating procedures relative to the cleaning of all surfaces, equipment, floors, walls, ceilings, tables, and the overall facility. Each standard operating procedure will utilize sanitation protocols appropriate to the area/equipment being cleaned. Eagle One will use sanitizing solutions in accordance with the instructions printed on the label.

Eagle One will adhere to the following operational standards and best practices to ensure cleanliness of any building or equipment used to store or display medical marijuana:

- Buildings or equipment used for the storage or sale of medical marijuana will be maintained in a clean and sanitary condition.
- All contact surfaces, including utensils and equipment, will be maintained in a clean and sanitary condition. Such surfaces will be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the U.S. Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils will be so designed and of such material and workmanship as to be adequately cleanable.
- All counter tops must be wiped regularly to prevent the spread of germs and to remove dust and debris.
- Public areas will be swept and dusted at least once a day
- Food and drinks will be prohibited within the public zone; only dispensary agents using the designated break room will be permitted to consume food and beverages.
- There will be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations.
- Litter and waste will be promptly removed, disposed of to minimize the development of odor and to minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal will be maintained in an adequate manner pursuant to the regulations.
- Floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair.
- There will be adequate safety lighting in all processing and storage areas, as well as areas where equipment/utensils are cleaned.

9.4.2 Facilities Cleaning Logs

Room and equipment maintenance logs will be posted in each room of the Dispensary facility. These logs will be updated daily with each scheduled cleaning and maintenance action being logged by an Eagle One employee.

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9.4.3 Litter and Waste Removal

EAGLE ONE will employ standard operating procedures for controlled waste management for its facilities. All litter and waste generated from normal facility operations will have a defined path for disposal.

Litter and waste will be properly disposed of and the systems for waste disposal will be maintained in good working condition to prevent the litter and waste from becoming a source of contamination in areas in which medical marijuana products are stored or exposed

9.4.4 Hazardous Materials

Hazardous waste is defined as any substance no longer in use that has chemical and/or biological properties that may harm or endanger employees, material, or the environment if handled improperly. There are a variety of safety provisions that regulate the management, storage, and disposal of hazardous waste. Eagle One will fully comply with stated regulations to ensure the safety and health of our employees, clients, and customers.

9.4.4.1 Hazardous Materials Handling

If EAGLE ONE begins to handle any individual hazardous material or mixture containing a hazardous material which has a quantity (at any time during the reporting year) equal to or greater than those listed below, EAGLE ONE will complete a Hazardous Material Business Plan (HMBP) and submit a copy to the local agency (currently understood to be the Humboldt County DHHS Division of Environmental Health):

1. 500 pounds for solid hazardous materials. [H&SC §25503.5(a)]
2. The following amounts for liquid hazardous materials:
 - a. Lubricating oil as defined by H&SC §25503.5(b)(2)(B): 55 gallons of any type or 275 gallons aggregate quantity on site. H&SC §25503.5(b)(2) (A)]
 - b. All others, including waste oil: 55 gallons. [H&SC §25503.5(a)]
3. The following amounts of hazardous material gases:
 - a. Oxygen, Nitrogen, or Nitrous Oxide stored/handled at a physician, dentist, podiatrist, veterinarian, or pharmacist's place of business: 1,000 cubic feet of each material on site. [H&SC §25503.5(b)(1)]
 - b. All others: 200 cubic feet. [H&SC §25503.5(a)]
4. Amounts of radioactive materials requiring an emergency plan under Parts 30, 40, or 70 of Title 10 Code of Federal Regulations or equal to or greater than applicable amounts specified in items 1, 2, or 3, above, whichever amount is smaller. [H&SC §25503.5(a)]
5. Applicable federal threshold planning quantities for extremely hazardous substances listed in 40 CFR Part 355, Appendix A.

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9.4.4.2 Hazardous Waste Materials Disposal

EAGLE ONE will not to use plumbing systems to dispose of hazardous waste, regardless of whether they are "chemically resistant". Each department that utilizes hazardous chemicals will be equipped with appropriate disposal containers, labeled for each type of waste.

Different types of chemical waste must be segregated to avoid unnecessary mixing. Regular trash containers are not to be used to dispose of such waste. These containers will be stored in a segregated area within the waste mitigation room in the facility.

Disposal of any chemical, dangerous, or hazardous waste will be conducted in a manner consistent with federal, state and local laws, regulations, rules or other requirements. This may include, but is not limited to, the disposal of all solvents or other chemicals used in the production of Medical Marijuana Concentrate or any Medical Marijuana soaked in a Flammable Solvent for purposes of producing a Medical Marijuana Concentrate.

EAGLE ONE will contract with a local waste management Eagle One to dispose of any hazardous materials or waste produced from its operations.

9.4.5 Solid Waste Disposal

EAGLE ONE has identified all points where waste may be generated in its Grow and Processing operations as part of its initial design activities. EAGLE ONE's facilities have been designed to accommodate for the following types of waste anticipated to be generated from its operations:

- Unusable raw materials and inputs
- Green Waste that may arise during operations
- Recycling - packaging, cardboard, plastic, etc.
- Medical marijuana and medical marijuana products subject to voluntary or mandatory recalls
- Medical marijuana product returns
- Damaged, adulterated or mislabeled medical marijuana products
- Medical marijuana and medical marijuana products that have failed testing
- Medical marijuana processing byproducts
- Medical marijuana and medical marijuana product samples that have expired
- Trash

Appropriate containers such as 55 gallon NSF drums, green waste containers, recycling bins and generic trash receptacles will be placed in each room of the building dedicated to the cultivation and processing of medical marijuana and medical marijuana products.

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9.5 marijuana Records of destroyed product

Records of destroyed raw materials and product will be kept and cross-referenced by batch number and SKU. The weight or volume, as appropriate, will be recorded along with the method of disposal. The methodology for recording destroyed Medical Marijuana and Medical Marijuana-Infused Product may be subject to requirements imposed by the State Licensing Authority and will be adjusted accordingly as required.

10 OPERATIONAL SECURITY

10.1 County's Access to Facility

Eagle One will ensure that the Humboldt County Sherriff's Department is given unfettered access, 24-hours per day, seven days per week, to the facility's security surveillance video, the specific details of which are provided in a Section below.

Eagle One personnel will cooperate fully with all conditions in the Use Permit and Use Permit Application requiring that the County, its agents, and employees, be granted access to the facility to seek verification of the information contained within the conditional use permit, permit applications, the Operations Manual, and the Operating Standards at any time before or after the conditional use permit is issued.

10.2 Access Controls

All entrances to the occupied building space of the facility will be restricted by an access control system capable of identifying authorized personnel. The system will also be capable of limiting personnel access to the appropriate locations within the facility depending on the person's job and responsibilities, and also limit facility access to certain times and days as appropriate. 24 hour access to the facility by emergency responders (Fire Dept.) will be provided via a Knox Box.

10.3 Lighting

Indoor and outdoor lighting will be controlled by photocell switching, timers, infrared motion sensors and/ or other state-of-the-art control systems to maintain an adequate light level at the interior and exterior of the facilities to ensure that personnel and the video surveillance system can effectively monitor the space in and around the facility at all times. Exterior lighting will be directed so as to not pose a nuisance to neighboring properties.

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10.4 Alarm Systems

A security /burglar alarm system will be installed and operated at all appropriate times within the facility. This system will be monitored by a third-party remote central control station which will have the responsibility for automatically providing notification to law enforcement of any breach in the facility's security system.

Communications between the facilities alarm system and the central control station will be uninterrupted by power outage and/ or disability of the telephone system. Communications will be powered by an uninterruptible power supply, and transmission will either be by cellular or radio.

10.5 Video Surveillance

[INSERT AVAILABLE INFORMATION]

10.5.1 Equipment

10.5.2 Coverage

10.5.3 Storage of Recordings

10.5.4 Security Reporting

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11 CONSERVATION & IMPACT PRINCIPLES

11.1 Measures Taken to Minimize Carbon Footprint

Our belief is that everyone has a serious responsibility to reduce their individual carbon footprint. We will do our part by doing the following:

11.1.1 Switch It Off

Turn off the lights when natural light is sufficient and when we leave the room. It's that simple!

11.1.2 Climate Control

Climate Control: Keep our temperature system on a moderate setting while we're in the room.

11.1.3 Wasteful Windows

Wasteful Windows: Use our windows wisely! If our climate control system is on, shut them. If we need a little fresh air, turn off the heat or AC.

11.1.4 Minimize Plug Load

Cut down the number of appliances we are running and we will save big on energy. For example, minimize the number of printers in our office.

11.1.5 Phantom Power

Use power strips to easily unplug electronics when not in use.

11.1.6 Give It a Rest

Power our computers down when we're away. A computer turned off uses at least 65% less energy than a computer left on or idle on a screen saver.

11.1.7 Switch to CFLs

Compact fluorescent light bulbs (CFLs) use 75% less energy than incandescent and last up to 10 times longer.

12 RECORD KEEPING, TAX AND REPORTING REQUIREMENTS

EAGLE ONE maintains records sufficient to clearly reflect all financial transactions and the financial condition of the business. The business records that EAGLE ONE maintains reflect:

- (a) Purchase invoices and supporting documents, to include the items and/or services purchased, from whom the items were purchased, and the date of purchase;
- (b) Bank statements and canceled checks for any accounts relating to the licensed business;

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- (c) Accounting and tax records related to the licensed business and each true party of interest, each in alignment with Generally Accepted Accounting Principles (GAAP) as applied by a licensed Certified Public Accountant;
- (d) Records of all financial transactions related to the licensed business, including contracts and/or agreements for services performed or received that relate to the licensed business;
- (e) All employee records, to include training;
- (f) Transportation records;
- (g) Inventory records;
- (h) All samples sent to an independent testing lab and the quality assurance test results;
- (i) Records of any theft of marijuana or marijuana products.

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BRAVO ZULU LLC

DISTRIBUTION OPERATIONS PLAN

May 2017

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OPERATIONS MANUAL – BRAVO ZULU LLC DISTRIBUTION

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1 OVERVIEW

1.1 Objective of This Document

The Bravo Zulu Distribution Operations Manual has several objectives:

- (a) to help guide Bravo Zulu advisors, team management, and team members in developing and sustaining productive and successful business practices;
- (b) to document Bravo Zulu distribution operations procedures and policies as they relate to Bravo Zulu functions;
- (c) to provide current Bravo Zulu distribution operations policies for financial management and team-management procedures; and
- (d) to serve as a reference for questions and problems as they arise in the day-to-day operations of Bravo Zulu distribution team.

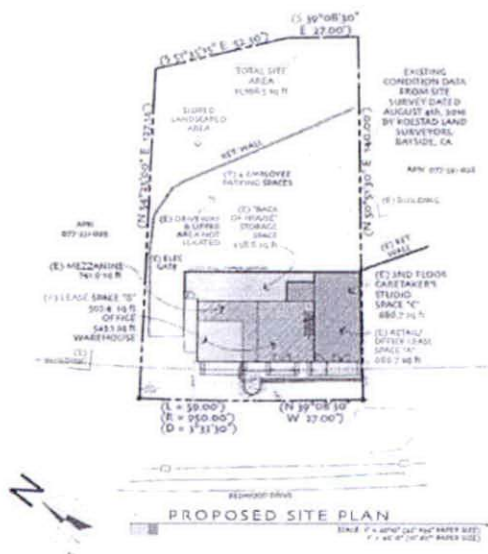
1.2 Nature of Bravo Zulu LLC

These same commitments will drive Bravo Zulu's approach to the production and delivery of medicine to qualified license holders in California's medical marijuana program. Bravo Zulu's enterprise philosophy and operations platform has been built upon the background expertise of Bravo Zulu principals and then adapted to align with evolving medical marijuana industry standards, such as the Patient Focused Certification (PFC) set forth by the Americans for Safe Access (ASA) organization.

1.3 Bravo Zulu Distribution Locations

1.3.1 General Overview

The Bravo Zulu 3525 Redwood Drive, Redway, CA 95560 Suite D



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2 STAFF TRAINING & EDUCATION

2.1 Staffing Principles

Bravo Zulu's commitment to professionalism and patient-care is embodied in its collection of hyper-qualified professionals, its comprehensive compilation of industry best practices, institutional knowledge, and its structured programs for training its staff in the science and use of medical marijuana. Bravo Zulu will demand uncompromising excellence from its staff and will provide for on-going education regarding the entire scope of medical marijuana issues. In so doing, Bravo Zulu will ensure the conscientious delivery of medicine and the safety of patients.

From the initial stages of candidate vetting, through hiring and on-going education, Bravo Zulu is focused on establishing the right employees in the right jobs and ensuring that those employees are entirely current and compliant with age requirements, character/background required by statute, and the best-practices prevailing in this industry.

All Bravo Zulu staff must obtain and maintain approval by DOH to act as medical marijuana distribution employee, including irrevocable (during time of employment) consent to have background checks run to determine their qualification for employment.

Bravo Zulu's hiring processes will include multiple interviews, background checks, and training. Bravo Zulu requires background checks on all candidates for employment. To the extent permissible by California State and Federal employment law, Bravo Zulu will not hire persons with criminal histories, or background check results inconsistent with Bravo Zulu's mission to operate a legal and socially responsible enterprise. Training for all employees includes education on local, state, and federal laws regarding medical marijuana.

3 MARIJUANA DISTRIBUTION DAILY OPERATIONS

3.1 Staff Hygiene

All Bravo Zulu employees understand the importance of hygiene for the safety and integrity of the product and of Patient's health. Every employee agrees to:

- (a) Clean his or her hands and exposed portions of his or her arms in a hand-washing sink:
 - i. Before preparing marijuana products or marijuana-infused products, including, without limitation, working with ingredients, equipment or utensils;
 - ii. After handling soiled equipment or utensils;
 - iii. After touching bare human body parts other than his or her clean hands and exposed portions of arms; and
 - iv. After using the toilet facilities.
- (b) Wear clean clothing appropriate to the tasks assigned to him or her.

If any Bravo Zulu employee has any health condition that they reasonably believe may adversely affect the safety or quality of Bravo Zulu Products, that employee is prohibited from

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having direct contact with any Products or product-related equipment until a designated Bravo Zulu authority determines that the health condition of the employee will not adversely affect the Product.

More broadly, the hygiene obligations set forth in Sections 80 to 101 of the adopter regulations, and their parallel presentation in both the NRS and NAC, will be converted into a clearly defined hygiene regime and effective training program. Any Bravo Zulu staff who are involved in the handling of medical-grade marijuana or marijuana-related Product will be required, with recurrent regularity, to complete such training and affirm their hygiene practices. Bravo Zulu is unalloyed in its commitment to Product safety and conscientious care for Patient health.

3.2 Operational Workflow

3.2.1 General Procedures

[INSERT RELEVANT CROSS-REFERENCES FROM OTHER OPERATIONAL MATERIALS]

3.2.2 Opening checklist

- Lock the door behind you as you enter the building.
- Unarm the security system.
- Turn on the lights in the facility.
- Store your personal belongings in your locker.
- Put on your badge.
- Clock in for your shift.
- Open product vault and begin stocking the shelves for the day.
- All Cash Handlers need to log in and prepare your cash drawer for your shift.
 - Open the safe and take the appropriate bank bag out. Make sure the safe is securely closed once you remove your bag.
 - Count your bank bag to ensure that your starting cash is exact.
 - Make sure to enter your exact starting cash into Green Bits. For example, if your bank bag only has \$195 in it, then you enter \$195.
- Turn on the music.
- Do a sweep of the store to make sure that the space looks tidy.
- Do a sweep to make sure that your inventory is sufficiently stocked and the area is tidy.
- **MANAGEMENT/LEAD EMPLOYEES** should ensure that the security has arrived and is ready to begin their shift.
 - Ensure that the staff is sufficiently prepared for their shift, and logged into their computer terminal.
 - Facilitate a short team huddle to brief the staff on daily goals and any pertinent business matters.
 - Check phone messages.

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3.2.3 Closing checklist

- Lock the doors.
- Begin loading the back stock of inventory onto the carts to bring to the product vault.
- All Bud Tenders/Cash Handlers need to count down and reconcile their cash at the end of the business day
 - Take your starting cash total (?) and the 'Net Cash' amount listed for your shift. The amount in the cash drawer needs to add up to the sum total of these two figures. It helps to have paper available to write the totals out for the cash and change as you tally it up.
 - Start with the largest bills first. Count them out and lay them on the counter, all facing the same way. Write down the amount. Count down the hundreds, fifties, twenties, tens, fives and ones and lay them out in piles according to denomination. Write down the total for each of these denominations in a separate row on your piece of paper. Once again, make sure that all of the bills are facing the same way. Count down the change. Keep the change in its own compartment to better keep track of it. Write down the totals as you go.
 - Add up the total of the cash drawer and reconcile it against your ending figure from step 1. The amount should match. If it doesn't, recount your piles and make sure that your figures are correct. If there still is no match, check under the cash drawer to make sure some money didn't end up under there. If you have an overage or you fall short, you need to make note of this and track down where the error happened. YOU are ultimately responsible for any overages/shortages. Please note any details, notify the assistant manager, and expect a follow-up.
 - Enter your net cash amount that you counted.
 - Print your 'Shift Report', highlight the 'Net Cash', 'Closing Drop', and 'Over/Short' amount to signify to the manager that you have noted and take responsibility of those numbers.
 - Log out of ERP Software.
 - Secure your closing drop, along with your 'Shift Report' in the envelope. Put the envelope directly in the drop safe.
- Sweep & Vacuum.
- Stock and tidy the bathrooms.
- Replenish the educational material.
- Turn off the music.
- Sweep the entire building (incl. restrooms) to ensure that no one is unaccounted for.
- Glance over the area to make sure the space looks exactly like you would want to find it in the morning when you open.
- Clock out at the end of your shift.
- Take your personal items out of your locker.

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- Turn out the lights
- Arm the alarm and lock the door behind you.

3.2.4 Managements Daily/Weekly Cash Reconciliation Procedure

3.2.4.1 DAILY SALES RECONCILIATION

Gather the daily drops from the drop safe.

Fill out your daily sales worksheet.

- Organize your drop envelopes sequentially by register number. Starting with register 1.
- Pull out the shift report. Highlight the 'Net Cash' amount, the 'Closing Drop' amount, and the 'over/short' amount.
- Take a moment to note that everything on the report looks correct. For example: The time that the shift was opened, the employee that opened it, the starting cash amount (should always be \$200), the dates that the shift was open, discounts (discounts should be regularly investigated to make sure that everyone is following discount guidelines), etc.
- Record the numbers on your Daily Sales Worksheet. Document the reasons for any overages/shortages in the notes section. Each employee should be noting and explaining any discrepancies. If not, please get in contact with the employees that worked that shift and investigate. ALL VARIANCES IN THE NUMBERS NEED TO BE ACCOUNTED FOR.
- Count the cash in the envelope making sure that the cash in the envelope matches the amount documented in the 'Closing Drop' column. Any discrepancies need to be addressed with the employee operating the register on that date/time. The employee on that register is responsible for those discrepancies.
- Once each envelopes information is properly recorded, and the money is accounted for, total the weekly deposit on the worksheet. Recount all the cash to make sure that your total on the worksheet matches the total cash in hand.

Fill out a bank deposit information for armored truck pick-up or bank delivery. Put the deposit slip and the cash into a bank bag. Store that bank bag in the safe until armored truck comes for pick-up.

Clip the coinciding shift reports with the weekly accounting worksheet and the deposit slip so that all the information is in one place, and all the money is fully accounted for. File in the appropriate months file.

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3.2.4.2 Daily Accounting Worksheet

DATE / REGISTER #	NET CASH	CLOSING DROP	OVER/SHORT	NOTES
TOTALS:				

DATES	DAILY DEPOSIT TOTAL (the sum of all the closing drops)

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3.2.4.3 Monthly Accounting Worksheet

WEEKS DATES	WEEKLY GROSS SALES	WEEKLY DELIVERIES	WEEKLY NET SALES	WEEKLY GOAL	VARIANCE	NOTES
MONTHLY TOTAL				MONTHLY GOAL		

3.2.5 Management's Weekly/Monthly Reports

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4 INVENTORY MANAGEMENT

4.1 Loss & Diversion Prevention

The security measures will secure the medical marijuana against diversion for non-medical purposes by protecting against theft not only from intruders, but also from staff members and visitors. This is done by limiting access both into and within different areas of the facility as necessary and by surveillance monitoring of personnel and visitors at all times when in close proximity to the product. Strict inventory control measures will also be engaged to prevent and detect diversion.

4.1.1 Daily Operations Training

Bravo Zulu will diligently train and periodically audit employees on all inventory management practices, including the use of Bravo Zulu's integrated Seed-to-Sale based Enterprise Resource Management (STS+ERP) software and Inventory Control protocols. Bravo Zulu's employees will learn compliant practices and technologies necessary to daily operations and useful for identifying inventory discrepancies and potential diversion. Stringent execution of the Inventory Control procedural steps and STS+ERP reporting capabilities will ensure that Bravo Zulu has complete and real-time awareness of its entire inventory of medical marijuana products.

4.1.2 Diversion Prevention Training

All Bravo Zulu employees will be trained in procedures related to detection and prevention of diversion of medical marijuana. This will be in addition to training on all daily operations standard operating procedures.

Bravo Zulu's Diversion Prevention Training will address:

- Security measures and anti-diversion controls (i.e., preventing theft, loss, or misuse of marijuana);
- Using the Department's Seed-to-Sale (Electronic Tracking) System as an anti-diversion tool;
- California and Humboldt County Rules and Regulations relating to medical marijuana;
- Preventing the diversion of marijuana from states where it is legal under state law in some form to other states;
- Physical Security;
- Operational policies and procedures, including
 - patient data and certificate verification;
 - limitations on dispensing medical marijuana products;
- Reporting Requirements and Channels; and
- Bravo Zulu's "whistleblower" structure and procedures, designed to ensure complete safety and protection in reporting possible issues relating to diversion or negligence.

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4.1.3 Training Frequency

Training sessions will also be conducted throughout the year. This training may be conducted by licensed third parties, as permitted by the Department, including: law enforcement, consultants, and other presenters on topics that Bravo Zulu determines are relevant to the employees at Bravo Zulu facilities. All Bravo Zulu employees, as well as contracted third parties, will acknowledge by signature that they have read and understand all policies and procedures for which they have been trained.

4.1.4 Privacy & Security of Data Storage

As required by law and in pursuit of patient confidence and privacy, Bravo Zulu will ensure that its system stores all necessary data on accredited and potentially HIPAA-compliant servers (if determined necessary). Bravo Zulu and its information technology providers will maintain stringent physical security of servers, maintain access control restrictions to the data and servers, and protect patient identifiable information through encryption. All record data access will be managed based on tiers of "user role" and associated permissions: username/password access will be required for each user accessing the system, with all passwords being tested for strength and subject to regular renewal.

Records will be properly and securely maintained for at least six (6) years from their date of last transaction or reference.

4.2 ERP – Inventory Management

The facilities inventory control process includes tracking of all incoming raw and processed materials, including the name and state license number of the cultivator, the testing lab data (as applicable), the strain, the supplier's product tracking identification data, and bill of lading from the transport company. All incoming raw materials will be assigned a batch number that can be cross referenced to the above referenced data and stays with the product through the process and to final sale to retailers. All outgoing product will be tracked by SKU, batch number, invoice, and shipping documents; unless the product is not for sale and will be destroyed.

The methodologies for tracking and Inventory Control of Medical Marijuana and Medical Marijuana-Infused Product may be subject to requirements imposed by the State Licensing Authority and will be adjusted accordingly as required.

- Inventory Generation & Tracking
 - Classifications for type and caliber of Product
 - Price and profile designations, including pricing
 - Assign unique barcodes or use existing product barcodes
 - Transfer inventory within facility to ensure real-time, to-the-room accuracy of information
 - Create virtual labels and identifiers...then print as needed.

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- Inventory data be accessed based on an employee's site permissions, allowing management to provide rules-based access to only selected inventory at selected sites to a specific employee.
 - Mobile devices enabled – perform stocking-actions directly on the device or print stock-takes for manual paper then PC entry
- Purchase Order creation and receipt
- Traceability functionality records and tracks details regarding supplier, supply date range, supplier batch details, purchase order number and more
 - Balance of all inventory is available at all times, filtered according to demand.
- Re-stocking and supply level alerts generated when an inventory item has a low balance, the alert level is individually set for each inventory component
- Staff authorizations
 - Add employees and vehicles for the built-in transportation features
 - Add vendors
- Financials
 - Create and track records of accounts receivable/payable, including invoicing for actual transactions
 - Manage and record inbound and outbound transfers
 - Audit Inventory, particularly in terms of accurate reportage on Product volumes and state of preparedness.
 - Create different inventory types
 - Tax collections/tracking
 - Set price points

4.2.1 Monthly and Annual Inventory Reviews

The Bravo Zulu team will conduct physical inventory counts of medical marijuana products monthly. Bravo Zulu's Quality Assurance team will independently audits of physical inventory of medical marijuana products vs. reported stock in the Seed to Sale Inventory Control system on at least an annual basis.

Bravo Zulu will produce reports from its Seed to Sale Inventory Control system that document inventory audits and include the following information at a minimum:

- The date of the inventory audit
- A summary of the inventory audit findings and,
- The employee identification numbers, names, titles or positions of the individuals who conducted the inventory audit

This information will be made available internally and to the Department upon request.

Bravo Zulu's STS+ERP system is designed to incorporate several checks and balances to carefully manage Bravo Zulu's medical marijuana product inventory and prevent discrepancies. The

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system will provide a centralized point for all inventory in Bravo Zulu's facilities. The following system features will be included to assist in identifying inventory discrepancies in a timely manner:

- No negative inventory values will be allowed in the system. Any transaction that would cause an inventory value to become negative will be placed on hold and will be investigated by Bravo Zulu's Quality Assurance team.
- The system will provide audit and control reports to identify all transactions and a validation point to determine if a stock discrepancy exists. All inventory adjustments by a Bravo Zulu employee will be logged identifying the individual that made the adjustment and the time it was done.

4.2.2 Investigating Inventory Discrepancies

The Seed-to-Sale Inventory Control system will provide a de facto chain-of-custody tracking mechanism to identify any time medical marijuana products are added or subtracted to Bravo Zulu's inventory throughout their lifecycle.

Should any material reduction in the amount of medical marijuana products in the facilities inventory occur, the Bravo Zulu Quality Assurance team will investigate to determine where the loss has occurred. The investigation and its results will be reported to the Director of Security who will then take and document corrective action.

If a reduction in the amount of medical marijuana products in Bravo Zulu's inventory is due to suspected criminal activity by an employee, the Quality Assurance team will report the suspected employee to the Director of Security. They will take appropriate action which includes notification of the Department and law enforcement within 1 business day of the suspected loss.

Follow-up reports will be submitted concerning any significant discoveries relating to the incident. All incidents must be formally closed and signed off upon by the Director of Security.

If the discrepancy requires modification to existing standard operating procedure(s), Bravo Zulu will revise the procedure, making sure it is checked against existing procedures for anomalies, duplications, conflicts, and ensure that it adheres to current regulatory requirements. The revised SOP will be sent for review and approval by an internal review committee. Once approved, the procedure will be implemented and all affected Department Managers will be notified to train their teams on the new procedure.

An Audit Report will be written at the completion of each standard operating procedure audit which will include the disposition of the audit and summary findings. The final audit report will include: an audit checklist, all relevant supporting documentation, Corrective and Preventive Actions ("CAPAs") implemented and an executive summary and conclusion. All completed

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audits will be maintained as records and will be available for review by the Department upon request.

5 QUALITY ASSURANCE, PACKAGING, & LABELING

5.1.1 Supplemental Materials

Bravo Zulu will make available a range of supplemental materials (such as brochures), either authored by or in collaboration with the cultivation centers or processing operations, which convey important information about the provenance and characteristics of its Products. Such materials will be made available on request. These materials will:

- (a) disclose any pesticides applied to the marijuana plants and growing medium during production and processing;
- (b) identify the techniques and chemicals and compounds used for any form of extraction or concentration;
- (c) Assert specific warnings, as follows:
 - i. "Warning: This product may have intoxicating effects and may be habit forming. Smoking is hazardous to your health."
 - ii. "There may be health risks associated with consumption of this product."
 - iii. "Should not be used by women who are pregnant or breast feeding."
 - iv. "For use only by the person named on the label of the dispensed product. Keep out of the reach of children."
 - v. "Marijuana can impair concentration, coordination and judgment. Do not operate a vehicle or machinery under the influence of this drug."
 - vi. If applicable, "This product contains or is infused with marijuana or active compounds of marijuana."
 - vii. If applicable, "Caution: When eaten or swallowed, the intoxicating effects of this drug may be delayed by 2 or more hours."

5.1.2 Labels for Wholesale Product

Bravo Zulu will receive product lots from cultivation centers or processing facilities, and will require that such materials are labeled with accurate information and attestations regarding the products, such as:

- (e) Bravo Zulu name and its medical marijuana establishment registration certificate number;
- (f) The lot number of the product;
- (g) The date of harvest;
- (h) The date of final testing;
- (i) The date on which the product was packaged;

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- (j) The cannabinoid profile and potency levels and terpenoid profile as determined by the independent testing laboratory;
- (k) If the product is perishable, the expiration date; and
- (l) The quantity of marijuana contained in the product unit.
- (m) § 5094. Packaging and Labeling

This information will be displayed in a form substantially similar to the following:

<p style="text-align: center;">JT'S NURSERY Certificate Number: 123 456 789 001 0001</p> <p style="text-align: center;">Lot Number: 1234</p> <p style="text-align: center;">Harvested on: 01/01/2013</p> <p style="text-align: center;">Final Testing Date: 01/15/2013 Packaged on: 01/17/2013 Best if used by: March 17, 2013</p> <p style="text-align: center;">16.7% THC 1.5% CBD 0.3% CBN Myrcene 5.6 mg/g Limonene 5.1 mg/g Valencene 3.5 mg/g</p> <p style="text-align: center;">Net Weight: 2 lbs.</p>

5.2 Quality Assurance Review of Packaged Materials

Bravo Zulu will regularly review products in inventory in storage in order to:

- (a) Examine packaged and labeled products during finishing operations to provide assurance that the containers and packages have the correct labels;
- (b) ensure that the samples are visually examined for correct labeling; and
- (c) Record the results of the examinations performed in the applicable production or control records.
- (d) § 5104. Quality Assurance Review
- (e) Storage of material must go through a licensed commercial cannabis distributor as stated in Section 5090 of Title 16, Division 42

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6 TRANSPORTATION

6.1 General Transportation Principles

All medical marijuana deliveries will be received at the facility from a State licensed and/ or locally permitted licensed transport company; and all Medical Marijuana-Infused Products will be transported to State licensed and/ or locally permitted licensed Wholesale/Distribution companies by a State licensed and/ or locally permitted licensed transport company.

Transportation Manifests will be used to track movement of all marijuana and marijuana products including the shipping and receiving agent, quantities of product, make/model of vehicle, departure time, and estimated arrival time. Alerts may be established to provide information to management on late shipments.

All Applicant vehicles will be outfitted with Global Positioning System ("GPS") transmitters. The transportation plans and GPS travel logs of appropriate Applicant agents and the logistics of Applicant's delivery schema will be periodically reviewed to ensure compliance with this transportation restriction.

The SOPs for receiving shipments, confirming accuracy or reporting discrepancies, and processing items into inventory provide detail and checklists for the following protocols:

- On the day prior to delivery, Applicant will receive, by a direct and secure licensee-to- licensee transmission, a manifest from the shipping Licensee indicating the next day's delivery.
- When the transporting agent carrying the delivery is approximately ten (10) minutes from arrival, the shipping licensee will notify Applicant's staff and Security team.
- The delivery vehicle will be directed to a secured parking area
- Applicant agent will access the electronic manifest in Applicant's enterprise resource planning ("ERP") system;
- Applicant agent will confirm the identity of the transportation agent and match this ID against the ERP system;
- Transportation agent will provide a copy of the electronic manifest for the shipment;
- Receiving agent will review the shipment to ensure that
 - packaging is secure, undamaged, and appropriately labeled;
 - packages are labeled as described in the electronic manifest; and
 - contents match those described in the electronic manifest;
- Receiving agent will record in the manifest record in the ERP:
 - their confirmations of shipment review;
 - the signature and ID number of the transportation agent;
 - the date and time of change of custody for the shipment;
- Applicant agents will then:
 - Enter products into the ERP inventory management system;

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- Segregate received items from general inventory pending further inspection.

Any discrepancy in the shipment will be:

- recorded in the manifest record within the ERP
- investigated and reported via an Incident Report Form;
- reported to the shipping party, within 1 business day, in order to finalize the post-delivery affirmations; and
- escalated to Applicant's Chief Compliance Officer and potentially reported to the Commission in accordance with

Applicant will record in its enterprise resource planning ("ERP") system the following data relating to shipment-receiving:

- Shipping licensee name and address;
 - Shipping licensee's shipment identification number;
 - Shipping licensee package-preparer agent name;
 - Receiving licensee name and address;
 - Weight and description of each individual package;
 - Total number of individual packages; and
 - Any handling or storage instructions.
1. *The shipping Licensee's transporting agent will be greeted upon arrival and instructed by Applicant's Security personnel to park the delivery vehicle in a secured area. Applicant will (a) request verifying identification from the transporting agent, (b) create a digital record of the agent's state issued identification and marijuana transport agent licensing information, (c) input this digital record into Applicant's enterprise resource planning ("ERP") and state-reporting system.*
 2. *After verification and recordation of the transporting agent ID, the Manager and the transportation agent will move into the secured staging area. In this secured area, the Manager will conduct all required inspections of packaging to ensure that it is secure, undamaged, and appropriately labeled. The tamper evident shipping tape will also be inspected. This inspection event will be logged on to the intake checklist.*
 3. *The receiving Manager will assess the shipment to confirm that it is labeled as described in the electronic manifest, including:*
 - *Date/time that the package was sealed;*
 - *Name and signature of the preparing/sealing registered agent;*
 - *Shipping licensee name and address;*
 - *Shipment identification number;*
 - *A description of each item; and*
 - *Applicant's name and address as receiving licensee.*

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After all packages within a shipment have been inspected and deemed (a) compliant and (b) matching to all details of the manifest, then final weights and counts will be taken to ensure the shipment contains everything as described on the electronic manifest.

When transportation of medical marijuana is required, Applicant will only use registered agents (a) who are licensed as a motor vehicle operator by the State of [STATE] and (b) whose driving records are clean. Applicant will record all details associated with the delivery, including the transportation agent's name, driver license number, and make/model and license plate number of the transporting vehicle in its enterprise resource planning ("ERP") system. Any vehicle to be used for transportation of marijuana will be outfitted with Global Positioning System ("GPS") transmitters, and departure and expected arrival times will be tracked. The transportation plans and GPS travel logs of appropriate Applicant agents and the logistics of Applicant's delivery schema will be periodically reviewed to ensure compliance with this transportation restriction.

6.1.1 Transport Notices

Any movement of Product will be accompanied by the required notification into the software traceability system. The transporter will enter into the ERP system:

- (a) the type and amount of product being transported,
- (b) the name of the transporter, and
- (c) the time of departure and expected delivery.

The receiver of Product will enter the amount of product being received.

6.1.2 Who May Transport

All Bravo Zulu drivers are instructed that, with respect to operating a Bravo Zulu or personally owned vehicle for Bravo Zulu business and/or activities, they must:

- (a) Comply with all State, local, and traffic laws at all times.
- (b) Maintain a current, valid driver's license—and the affirmative obligation to notify Bravo Zulu of any moving violation, or other violations of motor vehicle law which may affect their driver's license, insurability, or restriction or suspension of their driver's license.
- (c) May not hold title to medical cannabis goods based on Section 5122 of Title 16, Division 42
- (d) Have proper insurance based on Section 5108 of Title 16, Division 42
- (e) Driver is compliant with Sections 5124
- (f) Driver is compliant with Section 5126 of Title 16, Division 42
- (g) Driver is complaint with Section 5126 of Title 16, Division 42
- (h) Ensure that the driver, and any passengers riding in any vehicle, wears seat belts/shoulder harnesses, even if air bags are available.
- (i) Never operate any Bravo Zulu vehicle or any personal vehicle driving on Bravo Zulu business while impaired, including:

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- i. under the influence of intoxicants, or .
- ii. by illness, fatigue, injury, prescription medication.
- (j) Never text-message or conduct non-hands-free phone conversations while driving.
- (k) Never allow unauthorized persons to ride in Bravo Zulu vehicles.
- (l) Maintain proper security for Bravo Zulu vehicle and its contents. The vehicle engine must be shut off, ignition keys removed, and vehicle doors locked whenever the vehicle is left unattended.
- (m) Promptly report mechanical difficulties or repair needs to management.
- (n) Record remote broadcast vehicle check-out and check-in information on proper forms as specified Bravo Zulu.
- (o) Always stow all loose items and equipment before moving the vehicle.
- (p) Use headlights 2 hours before sunset and until 2 hours after sunrise, or during inclement weather or at anytime when a distance of five hundred (500) feet ahead of the vehicle cannot be clearly seen.

6.1.3 Bravo Zulu's Broad Commitment to Compliance

Any Bravo Zulu driver, including volunteers or contracted service providers, who becomes aware of a situation in which he or she believes Bravo Zulu's legal or ethical responsibilities are being violated by another designated driver and/or purchaser licensee, or feels pressured to violate the law or Bravo Zulu's ethical responsibilities regarding the same, is required to notify Bravo Zulu of that concern.

6.2 Packaging & Labeling for Transportation

The Product will be stored in the vehicle in a locked, safe, and secure storage compartment that is secured to the inside body/compartment of the vehicle transporting the Product.

Product is transported in sealed packages, compliant with NRS and NAC. Such sealed packages or containers will not, under any circumstances, be opened during their transport.

Any and all Product to be delivered to licensed producers and/or dispensaries will be accompanied by a current and accurate Transportation Manifest, which will record:

- (a) the type and amount of product being transported,
- (b) the name of the transporter, and
- (c) the time of departure and expected delivery

6.3 Transport Tracking & Record Keeping

6.3.1 Transport - Delivery

Before transporting any Product, notification of shipment and shipping manifest will be generated based on Sections 5136 and 5138 of Title 16, Division 42. Bravo Zulu will enter into its ERP transaction system:

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- (a) the type of marijuana;
- (b) the amount of marijuana and/or weight of the Products being transported;
- (c) the name of the transporter/designated driver;
- (d) times of departure; and
- (e) expected delivery dates and times.

6.3.2 Receipt

Bravo Zulu will employ best efforts to ensure that the receiver enters into the traceability system the amount of product being received and the date and time of the receipt.

6.3.3 Record Keeping

Bravo Zulu will keep, securely and accessible at Bravo Zulu premises, all transportation-related records for a minimum of three (3) years. This includes:

- (a) transportation manifests,
- (b) order placements,
- (c) delivery receipts,
- (d) and notifications
- (e) compliance based on Section 5114 of Title 16, Division 42
- (f) compliance based on Section 5116 of Title 16, Division 42

6.4 Transportation Security

Bravo Zulu's dedication to the highest level of security, public safety, and smooth operation of California's medical marijuana system may recommend reliance on contract security escorts for product shipments.

Bravo Zulu's complete protocol for Security, including Transportation Security issues, can be found in Bravo Zulu document titled "ADVANCED PROPAGATION SECURITY GUIDELINES AND POLICIES."

- (a) Transporter is compliant with Section 5128 of Title 16, Division 42
- (b) Storage of products are compliant with Section 5130 and 5132 of Title 16, Division 42

6.5 Event Reporting Requirements

Any vehicle accident that occurs during Product transportation must be reported (by any Bravo Zulu employee, volunteer, or contracted service provider with knowledge of such) to the proper Bravo Zulu designee **within 2 hours** after the accident occurs.

Any loss or theft of Product or Bravo Zulu finances must be reported (by any Bravo Zulu employee, volunteer, or contracted service provider with knowledge of such) to the proper Bravo Zulu designee **immediately** after the individual becomes aware of the loss or theft.

The Bravo Zulu will immediately report the loss or theft to the appropriate law enforcement agency and to the Division.

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7 BUILDING OVERVIEW

7.1 Private Property & Availability to Authorities

The facility is not open to the public and will not accept visitors without a specific business purpose.

However, Bravo Zulu welcomes any inspection of the Medical Marijuana Center by the local fire department, building inspector, or code enforcement officer to confirm that no health or safety concerns are present.

7.2 Hours of Operation

Hours of operation will typically be from 7 AM to 7 PM; however, during periods of seasonally high workload, the hours of operations within the facility may increase. During such extend hours of operations, shipping, receiving, and any other traffic or noise generating activities will be limited to normal working hours.

7.3 Building Location and Dimensions

****Please review attached comprehensive architectural material*

7.4 Measures Taken to Minimize Carbon Footprint.

a) Bravo Zulu believes that everyone has a responsibility to reduce their individual carbon footprint. We will do our part by doing the following activities and more:

- a) Switch it Off: Turn off the lights when natural light is sufficient and when we leave the room. It's that simple!
- b) Climate Control: Keep our temperature system on a moderate setting while we're in the room. 68-70 degrees Fahrenheit.
- c) Wasteful Windows: Use our windows wisely! If our climate control system is on, shut them. If we need a little fresh air, turn off the heat or AC.
- d) Minimize Plug Load: Cut down the number of appliances we are running and we will save big on energy. For example, minimize the number of printers in our office.
- e) Give it a Rest: Power our computers down when we're away. A computer turned off uses at least 65% less energy than a computer left on or idle on a screen saver.
- f) Switch to CFLs: Compact fluorescent light bulbs (CFLs) use 75% less energy than incandescent and last up to 10 times longer.

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8 HEALTH, SAFETY, & SANITATION

8.1 Employee Health, Safety, & Sanitation Protocols

8.1.1 Regular Team Communications & Meetings

Bravo Zulu will communicate with employees regarding safety and health issues on at least a quarterly basis or as needed. Distribution agent awareness of potential health and safety hazards is critical to maintaining a safe work environment. Knowledge of how to control such hazards will aid in the prevention of injuries, illnesses and accidents in the workplace, and quality and cleanliness of the products. Safety issues will be included in regular safety meetings conducted by distribution management on a periodic basis. During these meetings, management will discuss with Bravo Zulu employee's issues including:

- Causes of recent accidents or injuries and the methods chosen to prevent similar incidents in the future.
- Any health or safety issues considered by the manager to require reinforcement.
- Any concerns, observations and suggestions by employees regarding workplace health or safety.

8.1.2 Indications of Health or Safety Issues

Bravo Zulu will institute standard operating procedures which require that any person who, by medical examination or supervisory observation, is shown to have, or appears to have, an illness, open lesion, including boils, sores, or infected wounds, or any other abnormal source of microbial contamination for whom there is a reasonable possibility of contact with preparation surfaces for medical marijuana products shall be excluded from any operations which may be expected to result in such contamination until the condition is corrected.

The Bravo Zulu management team will monitor the health of all employees. In the event the Manager believes an employee responsible for the handling of medical marijuana products is ill, they will terminate the employee's shift immediately. If upon return to work, Bravo Zulu still suspects the employee is ill, he or she will require the employee to obtain a physician's release to return to work in the facility.

An Bravo Zulu distribution agent is required to report to a supervisor any personal health condition that might compromise the cleanliness or quality of the medical marijuana the distribution agent might handle including an illness, open lesion, including boils, sores, or infected wounds, or any other abnormal source of microbial contamination. Employees that display any of the symptoms noted above will be instructed to self-report to their direct manager all such health conditions to prevent any adverse effect on a product. Employees who observe any of the symptoms noted above related to co-workers will be instructed to report their observations to the Quality Assurance team for follow up with the employee in question.

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All reports are to be immediately communicated to the on-duty distribution manager. If it is determined that an Bravo Zulu agent has a health condition that may adversely affect the safety or quality of the marijuana products, that agent will be prohibited from having direct contact with any marijuana or equipment until the manager determines that the health condition of the agent will not adversely affect the cleanliness or quality of any products.

Sufficient and accessible infection control supplies (e.g. hand-hygiene products, tissues and receptacles for disposal) are provided in all facility areas. Surface cleaning practices in common areas will be increased as necessary.

8.1.3 Training in Sanitation & Safety

Bravo Zulu will provide training to each employee regarding general safety procedures and hazards or safety procedures specific to that employee's work assignment. Training occurs upon hire, as well as whenever Bravo Zulu is made aware of a new or previously unrecognized hazard, or any Bravo Zulu Management Team leader believes that additional training is necessary.

8.1.4 Employee Clothing

Bravo Zulu requires that employees engaged in the Distribution of medical marijuana products wear clean clothing or an issued uniform appropriate for the duties they perform. Employees will be trained and required to practice good sanitation and health habits.

8.1.5 Handwashing and Lavatories

All personnel shall practice good sanitation and health habits. Employees must maintain adequate personal cleanliness standards and must wash their hands thoroughly in an adequate hand-washing area before starting work and at any other time when hands may have become soiled or contaminated.

Hand-washing facilities with running water at an appropriate temperature will be in the facility where good sanitary practices require employees to wash and sanitize their hands. Effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices will be provided.

Lavatories will be installed in Bravo Zulu's Distribution facilities and will be sanitized and maintained daily. Lavatories will be made available for both employee and visitor use with the latter being in a non-limited access area.

8.2 Prevention of Contamination of Medical Marijuana Products

Bravo Zulu will establish a multi-faceted approach to prevent contamination in its medical marijuana products. Standard operating procedures designed to maximize safety for employees and minimize potential contamination will be utilized within its facilities. Employees will be properly trained on quality control measures and protocols including:

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- Visual inspection of all items produced for any contaminants and foreign objects (plant material, hair, debris, etc.)
- Following all sanitary measures and procedures
- Ensuring that all persons working in direct contact with medical marijuana products shall conform to documented personal hygiene practices while on duty.

All operations in the receiving, inspecting, transporting, segregating, storing and dispensing of medical marijuana products shall be conducted in accordance with Bravo Zulu authored and regularly audited sanitation protocols.

Bravo Zulu will ensure that any permissible preparation or packaging of medical marijuana products is conducted in a secure space specifically designed for preparation and packaging located within the secure operations zone. The designated area will include a workspace that can be sanitized and is only for the preparation or packaging. As part of orientation, training for all staff members will include strict instructions that the designated area is for preparation and packaging of medical marijuana only. As a reminder, we will post signs at the entrance and in the designated areas stating: "This area is used exclusively for the preparation and packaging of medical marijuana." We have special protocols for cleaning and sanitation in these areas, including employee hand washing and hygiene.

Preparation of waste shall be segregated within the processing center to prevent any cross-contamination with any product processing areas. Waste will be properly removed and the standard operating procedures for waste disposal will be maintained in an adequate manner so that they do not constitute a source of contamination in areas where medical marijuana products are stored.

8.3 Facility Sanitation Resources & Design

8.3.1 Generally

Bravo Zulu will ensure that its facilities are continuously in proper working condition and that they are maintained on a regular basis. This includes all floors, walls, and ceilings in facilities. Proper and routine maintenance will provide a basis for employee safety and efficiency and will reduce any potential contamination that might otherwise occur.

All Bravo Zulu facilities will have a water supply sufficient for their operations. This supply will be derived from a public water system capable of providing a safe, potable and adequate supply of water to meet the operational needs of our employees and the overall facility.

8.3.2 Storage of Chemicals

The Bravo Zulu does not currently intend to handle any hazardous materials in amounts requiring a Hazardous Material Business Plan ("HMBP").

If Bravo Zulu operations do involve the handling of any non-exempt hazardous materials, it will register its hazardous materials with the local agency using the Hazardous Materials/Waste

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Registration Form, in order that any relevant agency could evaluate the storage or use and give notice of any permits or fees that apply.

Toxic cleaning compounds, sanitizing employees, solvents used in the sanitation of Bravo Zulu's facilities shall be labeled and stored in a manner that prevents contamination of medical marijuana products, and in a manner, that otherwise complies with other applicable laws and regulations.

Separate, dedicated areas will be defined for the storage of cleaning supplies, sanitizing employees and solvents used in Bravo Zulu's facilities.

8.4 Facility Protocols

8.4.1 Facility Sanitation SOPs

Bravo Zulu will implement standard operating procedures relative to the cleaning of all surfaces, equipment, floors, walls, ceilings, tables, and the overall facility. Each standard operating procedure will utilize sanitation protocols appropriate to the area/equipment being cleaned. Bravo Zulu will use sanitizing solutions in accordance with the instructions printed on the label.

Bravo Zulu will adhere to the following operational standards and best practices to ensure cleanliness of any building or equipment used to store or display medical marijuana:

- Buildings or equipment used for the storage or sale of medical marijuana will be maintained in a clean and sanitary condition.
- All contact surfaces, including utensils and equipment, will be maintained in a clean and sanitary condition. Such surfaces will be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the U.S. Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils will be so designed and of such material and workmanship as to be adequately cleanable.
- All counter tops must be wiped regularly to prevent the spread of germs and to remove dust and debris.
- Public areas will be swept and dusted at least once a day
- Food and drinks will be prohibited within the public zone; only distribution agents using the designated break room will be permitted to consume food and beverages.
- There will be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations.
- Litter and waste will be promptly removed, disposed of to minimize the development of odor and to minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal will be maintained in an adequate manner pursuant to the regulations.

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- Floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair.
- There will be adequate safety lighting in all processing and storage areas, as well as areas where equipment/utensils are cleaned.

8.4.2 Facilities Cleaning Logs

Room and equipment maintenance logs will be posted in each room of the facility. These logs will be updated daily with each scheduled cleaning and maintenance action being logged by an Bravo Zulu employee.

8.4.3 Litter and Waste Removal

Bravo Zulu will employ standard operating procedures for controlled waste management for its facilities. All litter and waste generated from normal facility operations will have a defined path for disposal.

Litter and waste will be properly disposed of and the systems for waste disposal will be maintained in good working condition to prevent the litter and waste from becoming a source of contamination in areas in which medical marijuana products are stored.

8.4.4 Hazardous Materials

Hazardous waste is defined as any substance no longer in use that has chemical and/or biological properties that may harm or endanger employees, material, or the environment if handled improperly. There are a variety of safety provisions that regulate the management, storage, and disposal of hazardous waste. Bravo Zulu will fully comply with stated regulations to ensure the safety and health of our employees, clients, and customers.

8.4.4.1 Hazardous Materials Handling

If Bravo Zulu begins to handle any individual hazardous material or mixture containing a hazardous material which has a quantity (at any time during the reporting year) equal to or greater than those listed below, Bravo Zulu will complete a Hazardous Material Business Plan (HMBP) and submit a copy to the local agency (currently understood to be the Humboldt County DHHS Division of Environmental Health):

1. 500 pounds for solid hazardous materials. [H&SC §25503.S(a)]
2. The following amounts for liquid hazardous materials:
 - a. Lubricating oil as defined by H&SC §25503.S(b)(2)(B): 55 gallons of any type or 275 gallons aggregate quantity on site. H&SC §25503.S(b)(2) (A)]
 - b. All others, including waste oil: 55 gallons. [H&SC §25503.5(a)]
3. The following amounts of hazardous material gases:

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- a. Oxygen, Nitrogen, or Nitrous Oxide stored/handled at a physician, dentist, podiatrist, veterinarian, or pharmacist's place of business: 1,000 cubic feet of each material on site. [H&SC §25503.5(b)(1)]
 - b. All others: 200 cubic feet. [H&SC §25503.5(a)]
4. Amounts of radioactive materials requiring an emergency plan under Parts 30, 40, or 70 of Title 10 Code of Federal Regulations or equal to or greater than applicable amounts specified in items 1, 2, or 3, above, whichever amount is smaller. [H&SC §25503.5(a)]
5. Applicable federal threshold planning quantities for extremely hazardous substances listed in 40 CFR Part 355, Appendix A.

8.4.4.2 Hazardous Waste Materials Disposal

Bravo Zulu will not to use plumbing systems to dispose of hazardous waste, regardless of whether they are "chemically resistant". Each department that utilizes hazardous chemicals will be equipped with appropriate disposal containers, labeled for each type of waste.

Different types of chemical waste must be segregated to avoid unnecessary mixing. Regular trash containers are not to be used to dispose of such waste. These containers will be stored in a segregated area within the waste mitigation room in the facility.

Disposal of any chemical, dangerous, or hazardous waste will be conducted in a manner consistent with federal, state and local laws, regulations, rules or other requirements.

Bravo Zulu will contract with a local waste management company to dispose of any hazardous materials or waste produced from its operations.

8.4.5 Solid Waste Disposal

Bravo Zulu has identified all points where waste may be generated in its operations as part of its initial design activities. Bravo Zulu's facilities have been designed to accommodate for the following types of waste anticipated to be generated from its operations:

- Unusable raw materials and inputs
- Green Waste that may arise during operations
- Recycling - packaging, cardboard, plastic, etc.
- Medical marijuana and medical marijuana products subject to voluntary or mandatory recalls
- Damaged, adulterated or mislabeled medical marijuana products
- Medical marijuana and medical marijuana products that have failed testing
- Medical marijuana and medical marijuana product samples that have expired
- Trash

Appropriate containers such as 55 gallon NSF drums, green waste containers, recycling bins and generic trash receptacles will be placed in the building.

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8.5 Marijuana Records of destroyed product

Records of destroyed raw materials and product will be kept and cross-referenced by batch number and SKU. The weight or volume, as appropriate, will be recorded along with the method of disposal. The methodology for recording destroyed Medical Marijuana and Medical Marijuana-Infused Product may be subject to requirements imposed by the State Licensing Authority and will be adjusted accordingly as required. Bravo Zulu will follow regulations based on Section 5102 regarding Laboratory Testing Results of Title 16, Division 42.

9 OPERATIONAL SECURITY

9.1 County's Access to Facility

Bravo Zulu will ensure that the Humboldt County Sherriff's Department is given unfettered access, 24-hours per day, seven days per week, to the facility.

Bravo Zulu personnel will cooperate fully with all conditions in the Use Permit and Use Permit Application requiring that the County, its agents, and employees, be granted access to the facility to seek verification of the information contained within the conditional use permit, permit applications, the Operations Manual, and the Operating Standards at any time before or after the conditional use permit is issued.

9.2 Lighting

Indoor and outdoor lighting will be controlled by photocell switching, timers, infrared motion sensors and/ or other state-of-the-art control systems to maintain an adequate light level at the interior and exterior of the facilities to ensure that personnel and the video surveillance system can effectively monitor the space in and around the facility at all times. Exterior lighting will be directed so as to not pose a nuisance to neighboring properties.

9.3 Alarm Systems

A security /burglar alarm system will be installed and operated at all appropriate times within the facility. This system will be monitored by a third-party remote central control station which will have the responsibility for automatically providing notification to law enforcement of any breach in the facility's security system.

Communications between the facilities alarm system and the central control station will be uninterruptible by power outage and/ or disability of the telephone system. Communications will be powered by an uninterruptible power supply, and transmission will either be by cellular or radio. The alarm system will be compliant to § 5074 of Title 16 Division 42.

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9.4 Video Surveillance

Bravo Zulu will ensure compliance with Section 5068 of Title 16, Division 42. Current law requires the safe and secure handling of medical cannabis goods but does not clearly enumerate all safety and security measures to be taken. Business and Professions Code section 19334(b) requires the bureau to establish minimum security requirements for the commercial transportation, storage, and delivery of medical cannabis goods.

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10 RECORD KEEPING, TAX AND REPORTING REQUIREMENTS

Bravo Zulu maintains records sufficient to clearly reflect all financial transactions and the financial condition of the business. The business records that Bravo Zulu maintains reflect:

- (a) Purchase invoices and supporting documents, to include the items and/or services purchased, from whom the items were purchased, and the date of purchase;
- (b) Bank statements and canceled checks for any accounts relating to the licensed business;
- (c) Accounting and tax records related to the licensed business and each true party of interest, each in alignment with Generally Accepted Accounting Principles (GAAP) as applied by a licensed Certified Public Accountant;
- (d) Records of all financial transactions related to the licensed business, including contracts and/or agreements for services performed or received that relate to the licensed business;
- (e) All employee records, to include training;
- (f) Transportation records;
- (g) Inventory records;
- (h) All samples sent to an independent testing lab and the quality assurance test results;
- (i) Records of any theft of marijuana or marijuana products.

11 ROLES AND RESPONSIBILITIES

Roles and Responsibilities

Chief Executive Officer – CEO:

- Intensifies management's efficiency by recruiting, selecting, and correcting managers. Also, developing an environment for offering information and opinions; providing educational opportunities.
- Creates and implements the organization's vision, mission, and overall goals.
- Accountable for fixing prices and signing business deals
- Accountable for providing direction for the business
- Answerable for signing checks and documents on behalf of the company
- Appraises the success of the organization
- Reports to the board

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Admin and HR Manager

- Accountable for supervision the smooth running of HR and administrative tasks for the organization
- Upholds office supplies by checking stocks; placing and expediting orders; evaluating new products.
- Guarantees operation of equipment by completing preventive preservation requirements.
- Appraises job knowledge by partaking in educational opportunities and reading professional publications
- Describes job positions for recruitment and managing interviewing process
- Carries out staff introduction for new team members
- Is saddled with training, evaluation and assessment of employees
- Responsible for arranging travel, meetings and appointments
- Supervises the smooth running of the daily office activities.

Warehouse Manager:

- Answerable to forming the safe and efficient delivery, storage and dispatch of warehoused goods
- Accountable for liaising with customers, suppliers and transport companies
- Plans, coordinates and screens the receipt, order assembly and dispatch of goods
- Accountable for using space and mechanical handling equipment professionally and making sure quality, budgetary targets and environmental objectives are met
- In charge of organizing the use of automated and computerized systems where necessary
- Accountable for keeping stock control systems up to date and making sure inventories are accurate;

Merchandize Manager

- Manages vendor relations, market visits, and the ongoing education and development of the organizations' buying teams
- Responsible for the purchase of beverages and carbonated drinks for the organizations

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- Responsible for planning sales, monitoring inventory, selecting the merchandise, and writing and pricing orders to vendors
- Ensures that the organization operates within stipulated budget.

Sales and Marketing Manager

- Accomplishes external research and coordinate all the internal sources of information to retain the organizations' best customers and attract new ones
- Models demographic information and analyze the volumes of transactional data generated by customer purchases
- Accountable for supervising implementation, advocate for the customer's needs, and communicate with clients
- Grows, performs and assesses new plans for expanding increase sales
- Documents all customer contact and information
- Represents the company in strategic meetings
- Helps to increase sales and growth for the company

Information Technologist

- Manages the organization website
- Handles ecommerce aspect of the business
- Responsible for installing and maintenance of computer software and hardware for the organization
- Manage logistics and supply chain software, Web servers, e-commerce software and POS (point of sale) systems
- Manage the organization's CCTV
- Handles any other technological and IT related duties.

Accountant / Cashier:

- Responsible for preparing financial reports, budgets, and financial statements for the organization
- Provides managements with financial analyses, development budgets, and accounting reports; analyzes financial feasibility for the most complex proposed projects; conducts market research to forecast trends and business conditions.
- Responsible for financial forecasting and risks analysis.
- Performs cash management, general ledger accounting, and financial reporting
- Responsible for developing and managing financial systems and policies

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- Responsible for administering payrolls
- Ensuring compliance with taxation legislation
- Handles all financial transactions for the organization
- Serves as internal auditor for the organization

Client Service Executive

- Ensures that all contacts with clients (e-mail, walk-In center, SMS or phone) provides the client with a personalized customer service experience of the highest level
- Through interaction with customers on the phone, uses every opportunity to build client's interest in the company's products and services
- Manages administrative duties assigned by the human resources and admin manager in an effective and timely manner
- Consistently stays abreast of any new information on the organizations' products, promotional campaigns etc. to ensure accurate and helpful information is supplied to customers when they make enquiries

Distribution Truck Drivers

- Helps in loading and unloading beverages and carbonated soft drinks
- Upholds a logbook of their driving activities to ensure compliance with federal regulations governing the rest and work periods for operators.
- Keeps a record of vehicle inspections and make sure the truck is equipped with safety equipment
- Assists the transport and logistics manager in planning their route according to a distribution schedule.
- Local-delivery drivers may be required to sell products or services to stores and businesses on their route, obtain signatures from recipients and collect cash.

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12 DISTRIBUTION CAPEX

This is the key areas where we will spend our start – up capital;

- The total fee for registering the business in the United States of America – **\$750.**
- Legal expenses for obtaining licenses and permits as well as the accounting services (software, P.O.S machines and other software) – **\$3,300.**
- Marketing promotion expenses for the grand opening of Distribution Company®, LLC in the amount of **\$3,500** and as well as flyer printing (2,000 flyers at \$0.04 per copy) for the total amount of **\$3,580.**
- The cost for hiring business consultant – **\$2,500.**
- The cost for insurance (general liability, workers' compensation and property casualty) coverage at a total premium – **\$2,400.**
- The cost for payment of rent for 12 month at \$1.76 per square feet warehouse facility in the total amount of **\$105,600.**
- The total cost for warehouse facility remodeling (construction of racks and shelves) – **\$20,000.**
- Other start-up expenses including stationery (**\$500**) and phone and utility deposits (**\$2,500**).
- Operational cost for the first 3 months (salaries of employees, payments of bills et al) – **\$60,000**
- The cost for Start-up inventory (stocking with a wide range of beverages, and carbonated soft drinks) – **\$100,000**
- Storage hardware (bins, rack, shelves, food case) – **\$3,720**
- The cost for counter area equipment (counter top, sink, ice machine, etc.) – **\$9,500**
- The cost for serving area equipment (plates, glasses, flatware) – **\$3,000**
- The cost for store equipment (cash register, security, ventilation, signage) – **\$13,750**
- The cost of purchase and installation of CCTVs – **\$5,000**
- The cost for the purchase of furniture and gadgets (Computers, Printers, Telephone, TVs, Sound System, tables and chairs et al) – **\$4,000.**
- The cost for the purchase of distribution vans / trucks – **\$25,000**
- The cost of launching a website – **\$600**
- The cost for our opening party – **\$7,000**
- Miscellaneous – **\$10,000**

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We would need an estimate of **\$500,000** to successfully set up our beverage and carbonated soft drinks distribution business. Please note that this amount includes the salaries of all the staff for the first month of operation.

Check List / Milestone

- Business Name Availability Check: **Completed**
- Business Registration: **Completed**
- Opening of Corporate Bank Accounts: **Completed**
- Securing Point of Sales (POS) Machines: **Completed**
- Opening Mobile Money Accounts: **Completed**
- Opening Online Payment Platforms: **Completed**
- Application and Obtaining Tax Payer's ID: **In Progress**
- Application for business license and permit: **Completed**
- Purchase of Insurance for the Business: **Completed**
- Leasing of warehouse facility and remodeling the facility: **In Progress**
- Conducting Feasibility Studies: **Completed**
- Generating capital from family members: **Completed**
- Applications for Loan from the bank: **In Progress**
- Writing of Business Plan: **Completed**
- Drafting of Employee's Handbook: **Completed**
- Drafting of Contract Documents and other relevant Legal Documents: **In Progress**
- Design of The Bravo Zulu's Logo: **Completed**
- Graphic Designs and Printing of Packaging Marketing / Promotional Materials: **In Progress**
- Recruitment of employees: **In Progress**
- Purchase of the Needed furniture, racks, shelves, computers, electronic appliances, office appliances and CCTV: **In progress**
- Purchase of distribution vans: **Completed**
- Creating Official Website for the Bravo Zulu: **In Progress**
- Creating Awareness for the business both online and around the community: **In Progress**
- Health and Safety and Fire Safety Arrangement (License): **Secured**

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- Opening party / launching party planning: **In Progress**
- Compilation of our list of products that will be distribute: **Completed**
- Establishing business relationship with beverages and carbonated drinks production companies within and outside of the United States of America: **In Progress**

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ATTACHMENT 4
Referral Agency Comments and Recommendation

The project was referred to the following referral agencies for review and comment. Those agencies that provided written comments are checked off.

Referral Agency	Response	Recommendation	Location
County Building Inspection Division			
County Public Works, Land Use Division	X	Ordinance required for perpendicular parking	
County Division of Environmental Health			
County Counsel			
Redway Community Services District			
Briceland Fire Protection District			
CALFIRE			
Bear River Band of the Wiyot Tribe			
NWIC			

ATTACHMENT 5

Q - Qualified Zone

ORDINANCE AMENDING SECTION 311-7 OF THE HUMBOLDT COUNTY CODE
 BY REZONING PROPERTY IN THE REDWAY AREA
 [ZR-17-002 (WEST RIVER LANE INC.)]

ORDINANCE NO. _____

The Board of Supervisors of the County of Humboldt do ordain as follows:

SECTION 1. ZONE AMENDMENT. Section 311-7 of the Humboldt County Code is hereby amended by reclassifying 11,000 square feet in the Redway area from Highway Services Commercial (CH) to Community Commercial (C-2) Qualified (Q) .

The area described is shown on the Zoning Map for the Garberville/Redway/Alderpoint/Benbow Community Plan and on the map attached as Exhibit A.

SECTION 2. ZONE QUALIFICATION. The special restrictions and regulations set forth in Section 4 herein are hereby made applicable to the property reclassified from Highway Services Commercial (CH) to Community Commercial (C-2) Qualified (Q) in accordance with Humboldt County Code Section 314-32, which authorizes restriction of the C-2 zone regulations by application of the "Q" (Qualified Combining Zone).

SECTION 3. PURPOSE OF QUALIFICATIONS. The purpose of the special restrictions and regulations herein imposed on the properties described in Section 1 is to maintain the CH Zone development standards on the parcel.

SECTION 4. SPECIAL RESTRICTIONS. Principal permitted uses and conditionally permitted uses otherwise allowed under the C-2 zone regulations of Humboldt County Code Section 314-2.2 are limited to those allowed by the CS Plan designation as shown in Table 4C of the General Plan, and are subject to the following development standards of the CH - Highway Services Commercial zone:

Development Standards

Minimum Lot Area	2,000 square feet.
Minimum Lot Width	Twenty-five feet (25').
Minimum Yard Setbacks*	
Front	None, except that where frontage is in a block which is partially in a Residential Zone (RS, R-1, R-2, R-3, R-4) the front yard shall be the same as that required in such Residential Zone.
Rear	Fifteen feet (15'), except that where a rear yard abuts on an alley, such rear yard may be not less than five feet (5').
Side	None, except that a side yard of an interior lot abutting on a Residential Zone (RS, R-1, R-2, R-3, R-4) or Agricultural Zone (AE, AG) shall be not less than the front yard required in such Residential Zone or Agricultural Zone.
Maximum Ground Coverage	(None specified.)
Maximum Building Height	Forty-five feet (45').

EFFECTIVE DATE. This ordinance shall become effective thirty (30) days after the date of its passage.

PASSED, AND ADOPTED by the Humboldt County Board of Supervisors this day of _____
 by the following vote:

AYES: Supervisors:

NOES: Supervisors:

ABSENT: Supervisors:

ABSTAIN: Supervisors:

VIRGINIA BASS, CHAIRPERSON,
HUMBOLDT COUNTY BOARD OF SUPERVISORS

ATTEST: _____
Clerk of the Board

ATTACHMENT 6
Zoning Comparison Table

ZONING COMPARISON TABLE

Use Type/Description	CH Zone	C-2 Zone
Car washes	P	--
Retail nurseries and greenhouses (non-cannabis related)	P	--
Amusement parks and commercial recreational facilities	P	--
Social halls, fraternal and social organizations, and clubs	P	P
Professional and business offices and commercial instruction	P	P
Stores, agencies and services of a light commercial character, conducted entirely within an enclosed building, such as antique shops, art galleries, retail bakeries, banks, barber shops, beauty salons, book stores, clothing and apparel stores, coin-operated dry cleaning and laundries, dry cleaning and laundry agencies, drug stores, florists, food markets, furniture stores, hardware and appliance stores, radio and television sales and services, restaurants and licensed premises appurtenant thereto, automobile service stations, studios, tailor shops, enclosed theaters, variety stores, and mortuaries	P	P
Caretaker's Residence which is incidental to and under the same ownership as an existing commercial use	P	P
Stores, agencies and services such as minor automobile repair; new automobile, trailer and boat sales, and used automobile, trailer and boat sales appurtenant thereto; bowling alleys; licensed premises not appurtenant to any restaurant, pet shops, public garages, sales of used or secondhand goods, and storage warehouses.	P	P
Within Housing Opportunity Zones multiple dwellings on the upper floors of multistory structures where below are commercial establishments engaged in uses designated "Principally Permitted" or "Conditionally Permitted" in the C-2 Zone Emergency Shelters within areas mapped to specifically allow emergency shelters as a principally permitted use	P	P
Hotels and motels	P	CUP
Outside Housing Opportunity Zones, apartments on the upper floors of multistory structures where below are establishments engaged in commercial uses designated "Principally Permitted" or "Conditionally Permitted" in the Zone, as well as emergency shelters outside areas mapped to specifically allow emergency shelters as a principally permitted use	SP	SP
Boarding and rooming houses and manufactured home parks	CUP	CUP
Dwellings, Manufactured homes	CUP	CUP
Small animal hospitals completely enclosed within a building	CUP	CUP
Small animal hospitals (not completely enclosed) and kennels.	CUP	--
Stores, agencies and services such as carpentry and cabinet-making shops, clothing manufacture, contractors' yards, dry cleaning and laundry plants, handicraft manufacture, lumber yards metal-working shops, wholesale outlet stores, painters' and decorators' yards, plumbing shops, printing, lithographing and major auto repair.	--	CUP
Special occupancy parks	CUP	--
Medical cannabis outdoor and mixed light cultivation,	--	CUP
Medical cannabis indoor cultivation (0-5,000 SF; 5,000 to 10,000 SF)	--	ZCC/CUP
Medical cannabis processing, manufacturing, and wholesale distribution facilities	--	SP
Medical cannabis retail nurseries	--	CUP
Medical cannabis dispensary	CUP	CUP

KEY:

P=Principally Permitted Use; SP=Special Permit; CUP=Conditional Use Permit; "--"=Not an Allowed Use; ZCC=Zoning Clearance Certificate