

GLENDALE Distribution OPERATIONS MANUAL

APN: 516-111-064 APPS: 13339

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- I. PROJECT DESCRIPTION** - The Glendale Cannabis Facility is a seed to sale establishment hosting the following faculties; DISTRIBUTION, Manufacturing and Processing. This facility will provide many services for licensed local Cannabis Cultivators.
- A. Address: 1691 Glendale Drive
Blue Lake, CA 95525
 - B. The Company will DISTRIBUTE both Medicinal Use and Adult Use Cannabis Products
 - C. The Company will engage in Commercial Cannabis Activities involving Receiving, Storing, On-Site Testing, and Distribution.
 - D. Onsite Manager Contact Information:
Name: MICHAEL BROSGART
Title: OWNER
Phone #: 202-320-7645
 - E. Alternative Contact Information:
Name: BRITTNEY CROSBY
Title: AGENT
Phone #: 904-669-0987
 - F. Hours of Operation 7am - 7pm Monday - Saturday
 - G. The Number of Employees: 4
 - H. Anticipated Gross Annual Revenue from Distribution of Cannabis to be determined once final floor plan is laid out. Company may operate as both a M-Manufacturer and an A-Manufacturer and shall produce individual Anticipated Gross Annual Revenue Reports for each license type.

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II. County Authorization - To be inserted here upon Licensure

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III. SITE

A. SITE PLAN * SEE ATTACHED

B. CONSTRUCTION PLAN NOTES -

- 1. Construction Schedule** - Estimated 8-10 months from breaking ground to construction completion.
- 2. Site Work** - Currently the entire parcel is paved, approximately 76,000 square feet. The proposed projects construction design has an estimated; 28,000 square feet foot print of new building, 22,000 square feet of parking and driveways, and installing an estimated 26,000 square feet of new landscaping. This projects construction will require removal of the existing pavement, Pacific Builders has estimated that amount at 60%.
- 3. Debris Removal** - Pacific Builders will be the General Contractors and they hire Kern Construction of McKinleyville California to remove, deconstruct, and recycle the debris. Cal-Trans acquires this recycled debris and re-uses it locally to build and repair roads.
- 4. Ground Disturbance** - Pacific Builders estimated that the depth of ground disturbance 3' for foundations, 4'-5' for Storm Drains features such as detention basins, 6'-8' for Sewer and Water Connections (one water supply, one sewer line, and one fire suppression line. PG&E trenches are normally 4' deep coming from the transformer into the building.
- 5. Perimeter Fencing-** Materials will consist of natural materials such as wood and steel. The height will be no more than zoning regulations allow for. Ideally the fence would be 8 feet in height.
- 6. HVAC** units will be located in enclosed structures with proper ventilation and located as north west as possible on the site to reduce the noise level for surrounding neighbors and wildlife. System will be designed with Carbon filters to minimize odor released from premises.

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IV. FACILITY OPERATIONS

A. Water Source, Storage, Irrigation Plan, & Projected Water Use - Non Diversional

1. *Water Source* is provided via a 6" water main provided by the Glendale Community Services District and a 4" sewer connection to premises.
2. The projected water use is based on three types; (*See TABLE 1)
 - a) Personnel - usage for restrooms, hand washing sinks, and water fountains
 - b) Sanitation / Janitorial - sanitary stations for cleaning equipment, utensils, and storage/transfer containers
 - c) Irrigation for Grounds

TABLE 1

ESTIMATED WATER USE APPS# 13339 - DISTRIBUTION			
PERSONNEL	3 EMPLOYEES	ESTIMATED 30 GAL/ DAY/EMPLOYEE (X) 6DAYS/WEEK	2,160 GALLONS PER MONTH
SANITATION	JANITORIAL	ESTIMATED 30 GAL / DAY (X) 30 DAYS	1,000 GALLONS PER MONTHS
			3,160 GALLONS PER MONTH ~ AVG LESS THAN 110 GPD

B. Site Drainage, Run-Off, Erosion Control Measures

1. Storm Water - The site proposes an estimates 25% of the parcel will be landscaped. The Landscape design reflects designated composting areas, trees, grass to be planted and areas that include storm water capture basins. The Buildings Roofing Design include strategic Gutters and Channels built to disperse rain run off into these planned capture basins that slow down and naturally filter water, Overall improving the condition of the lands as it is currently completely paved.

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C. Measure Taken to Ensure Protection of Watershed & Habitat

The Site is not known to be located in any sensitive habitat areas, including the Coastal Zone or stream side management areas. The Sites perimeter will be fully fenced to protect any wildlife from entering. The sites prior use was by a mill for stacking clean lumber.

D. Solid Waste Management and Cannabis Disposal Measures

Solid Waste will be stored in secure containers in a covered area and picked up on a weekly basis by Recology Arcata 555 Vance Ave, Arcata CA 95564.

Cannabis green waste created by pruning, trimming, decay, resulting in leaves, stems, decaying flower will be broken down and mixed with brown waste. Before any disposal of cannabis waste, it must be deemed "unusable and unrecognizable" by means of disguise through blending with solid waste, it must also be weighed and labeled with bill of lading with product info, and finally quarantined in a dedicated area on camera for 72 hours. Video Surveillance records will be stored for a minimum of 90 days.

Company will provide Department with required information of hauling or collection of Cannabis Waste by local agencies, franchisers, private permitted waste haulers, or self hauling.

E. Proper Storage for Pesticide, Fertilizer, Soil Amendments, & Petroleum, Products and Hazardous / Toxic Materials

There are no plans to have any Pesticides, Fertilizers, Soil Amendments, Petroleum, or Hazardous / Toxic Materials on Distribution Premise. If Any Hazardous / Toxic materials arrive or are stored at the distribution center, each in a properly constructed and maintained storage room that will protect personnel and the environment. Any Products or Materials that have been opened will be kept in their original container with labels affixed and then placed in secondary container to prevent spillage or cross contamination. In the event of a spill, area will be isolated, contained, and cleaned up as soon as possible. Applicant will maintain and keep all required warning signs posted, the Material Safety Data Sheets available and kept in storage room, all Emergency Contacts including name, address and telephone number of emergency care facilities, and any personal protective gear required.

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V. SECURITY PLAN

A. Unauthorized Access Prevention Measures - The entire property will be monitored with RFID Technology (Radio Frequency Identification) that is integrated with a 24 hour video surveillance system and a security alarm system with automatic law enforcement notification, our inventory tracking system, as well as people tracking via RFID chip in their required identification badge. This technology allows for the owners of Company and other persons privy to monitoring to access all activities occurring on site in real time. Each person, product, and process is tracked and monitored at all times, providing safety, security and accountability to all.

- a) Perimeter - Our site perimeter is completely fenced with 3 Gates. The main Gate Serves as the General Entrance & Exit. The Main Gate will be open during business hours and all first time visitors are required to register at specific premises where business is to be conducted, this includes but isn't limited to our; managers, employees, contractors, sub-contractors, vendors, distributors and the like. There is a secondary Gated Entrance that is accessible only to Authorized Personnel, Transporters and Contractors. Lastly there is an Exit only gate where delivery trucks, personnel etc leave the site.
- b) Construction - The Sites construction of each entry area, material or product storage area and exit areas used by personnel and products are well lit and commercial grade doors and locks are installed both on the interior and exterior. Any entry or exit door in Limited Access Areas are secured with RFID technology and only Authorized Personnel can open by scanning Identification Badge with RFID chip.
- c) Authorized Personnel - All Authorized Personnel, Suppliers and Visitors, upon first time arrival will be required to register with the Facility to receive a Laminated Identification/Access Badge. Access Levels throughout the Premises will vary on persons responsibility to corresponding processes and will be programmed into the ID Badge. All Authorized Personnel are required to wear Identification Badge with RFID chip assigned by company at all times while on property and any Contractors or Sub-contractors, vendors or distributors must at minimum wear a visible name tag while in Limited Access Areas. Limited Access Areas are restricted to anyone under the age of 21. All comings and goings of non-employee authorized individuals are logged, maintained, and accessible to licensing authorities. Anyone on site without proper identification and authorization must be escorted out by management

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- d) Security Monitoring Maintenance - Premises must be maintained so that all surveillance has a no obstructed views and that monitoring systems are not interfered with. Regular Inspection and Maintenance shall be performed and recorded.
- e) Suspicious Activity - When there is any reason to suspect suspicious activity, the first step is to document observations and accurate reporting of behaviors. Second, must be submitted in a timely manner to the Supervisors assigned SAR responsibility.

B. Theft and Diversion Measures

- a) Inventory & Personnel Tracking - Company's use of Vertically Integrated ERP (Enterprise Resource Planning) Software with RFID technology allows real time monitoring, tracking and reporting of all movements made by cannabis products and personnel on site at all times. The Software contracted will be compatible to integrate with the State Track and Trace Program.
- b) Accessibility to Limited Access Areas - Personnel Access will be limited to the area use required by job duties as well as specifically scheduled time frames for completion of job duties. In order to further prevent cannabis or cannabis product diversion, all personnel are required to store personnel belongings in the Personnel Locker Room. The Locker Room is an area where secured lockers are available to all personnel and accessible during working hours. These areas are denoted on the site plan with an asterisk.
- c) Diversion Risks - The risk of Diversion increases when Cannabis or Cannabis Products are not securely stored, (i.e., Transfers between Facilities) therefore a Supervisor must be present to inspect, document and accompany the product to its next secured holding. Supervisors identification and reports are attached to the Product Inventory Processing.
- d) Securing of Electronic Records - All mechanical components for Electronic Records including the Security Alarm System, Video Surveillance System, Inventory and Personnel Tracking System, etc are Stored in the Secured Record Storage Room and designated as a High Level Restricted Access Area. Only accessible through Office.

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C. Video Surveillance Measures

- a) System Requirements - The Premises Surveillance System features complete digital video surveillance capable of 24 hour continuous recording at 15 frames per second, providing clear images in all lighting environments at a resolution of 1280x720. All surveillance recordings are kept for 90 days and display at the current time and date on recorded event.
- b) Remote Access - Licensee will have remote access to Surveillance and can monitor all activities from off-site, strengthening activity tracking.
- c) Interference Prevention - Location installation of Surveillance cameras are out of persons natural reach and reasonable distance for foreign reach, so that if obstruction were attempted, identification of persons or activity will already be recorded. The Surveillance cameras are fully enclosed and protected from tampering or disabling, as all power and control features are Secured either on site in the Electronic Storage Room or Remotely Controlled by Licensee.
- d) Specified Areas Where Cannabis Or Cannabis Product is Weighed, Packed, Stored, Quarantined, Loaded and Unloaded for Transportation Including Preparation and Transfers
 - (1) DISTRIBUTION - Building C - Loading/Unloading Zone and Dock, Entrance & Exits , In-take / Sign-Out Area, Weighing Station Area, Quarantine Room, Packaging Room, Supply Storage, Disposal Room, Two Inventory Storage Rooms and 140 SF of Office Space connected to the Secured Record Storage.

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VI. PROCESSING PLAN

A. Location of Distribution Center - The Distribution Facility is located in Building C on the Site Plan it covers 3,160 sq.ft. and is divided into the following spaces; Entrance and Exits, In-Take Area, Weighing Station, Disposal Room, Supply Storage, Inventory Storage Rooms, Quarantine Room, Packaging Room, Unloading Zone, Unloading Dock, 140 SF Office, Secured Record Storage Room.

B. Summary of Distribution Activities - Distribution Facility will involve receiving Cannabis Products through the In-take Area. The In-Take Process involves, cross reference to shipping manifest, inspection, tagging by an authorized Distribution Personnel and stored in Quarantine Rooms until tested, Tagging will be in compliance with the METRC and monitored through Real time RFID Monitoring Technology. Tested, Tagged and approved Fresh / Raw Materials or In-process / Finished Products are then moved into Inventory Storage, until released for distribution to a licensed processing / Manufacturing Facility to be converted into a Finished Product. Finished Products will be stored appropriately until released for shipping to licensed cannabis retailer.

C. Estimated Number of Employees

a) 4 Total in the Distribution Center

D. Hours of Operation - 7am - 7pm Monday - Saturday

* All deliveries will be made between 8am and 6pm Monday - Friday *

E. Expected Daily Trips - AVERAGE 13 DAILY TRIPS (* See Table 2)

1. *ALL EMPLOYEES, SUBCONTRACTORS AND DELIVERY DRIVERS AGREE TO USE EXIT 4 GLENDALE DR ON HWY299 . THIS WILL REDUCE TRAFFIC ALONG GLENDALE DR, AS IT IS THE CLOSEST EXIT TO THE SITE.

TABLE 2

ESTIMATED DAILY TRIPS - APPS# 13312 - INDOOR CULTIVATION			
PERSONNEL	4 EMPLOYEES	ESTIMATED 2.5 TRIPS /DAY/ EMPLOYEE (X) 6DAYS/ WEEK	240 TRIPS / MONTH
DELIVERIES	AVERAGE DELIVERS PER DAY = 4 (1 DELIVERY = 2 TRIPS)	ESTIMATED 8 TRIPS / DAY/ (X) 5 DAYS/WEEK	160 TRIPS / MONTH

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ESTIMATED DAILY TRIPS - APPS# 13312 - INDOOR CULTIVATION

			400 TRIPS / MONTH ~ 13.3 TRIPS PER DAY
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F. Employee Facilities

- a) The Distribution Center is on city water and has all water processed in the Water Management Center on site.
- b) The facility provides all employees filtered water at water fountains and hand washing sinks, as well as ADA compliant bathrooms and toilets in the common area.
- c) These facilities will be constructed and provided as required by local and state laws and regulations.

G. Summary of Employee Safety Practices

- a) Processing Practices
 - (1) Clean and Sanitary Work Surfaces and Equipment
 - (2) Protocols for Cross Contamination, Mold, and Mildew Growth on Cannabis
 - (3) Employees Accessibility to face mask and gloves when handling Cannabis
 - (4) Employees Hygiene Clean Hand Practices

- b) Employee Safety Practices
 - (1) Safety Protocols & Employee Safety Training
 - (2) An emergency action response plan and spill prevention protocols
 - (3) Employee accident reporting and investigation policies
 - (4) fire prevention policies
 - (5) maintenance of material Safety Data Sheets (MSDS)
 - (6) materials handling policies
 - (7) job hazard analyses
 - (8) personal protective equipment policies
 - (9) Posted Emergency Contact List
 - (10) Operation Manager Contacts
 - (11) Emergency Responder Contacts
 - (12) Poison Control Contacts
 - (13) Employee Accessibility
 - (14) Safe Drinking Water
 - (15) Toilets

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(16) Hand washing Sinks

VII. Company Track and Trace System Compliance Policy - Company maintains strict standards for all operation activities involving cannabis and cannabis products by establishing thorough policies and procedures. Company will use required Track and Trace Software approved and registered by the Bureau and enter all commercial cannabis activity into the database within 24 hours of occurrence. Any misrepresentation or falsifying of database entry into the System is subjects Licensee to Enforcement Action by the Department, regardless of who made the entry. If loss of access to the System occurs at any point in time, Licensee shall maintain detailed records including; the time access was lost and gained, all inventory activities during time of no access and enter them back into System with 3 days of gaining access. Company will not transfer cannabis products to distributor until access is restored and all back information is entered. If operations are in place prior to access of the Track and Trace System Licensee will enter all inventory within 30 days after receipt of UID tags.

• Licensee Responsibilities Include;

- Register for a Track and Trace System Training within 10 days of processed State Application Payment or within 5 days of receiving license approval by the Department.
- Order UID tags within 5 days of receiving access to System and recorded within 3 days of receipt into the System.
- Assigning at least one owner to be the Track and Trace System Account Manager.
- Assuming responsibility of maintaining accurate and complete information entered into Track and Trace System
- Assuming responsibility of any actions taken by System Account Manager or User while logged into system and while conducting any commercial cannabis activities.

• Account Manager Responsibilities Include;

- Designating authorized system users who have completed proper training and show competence in ability to use system lawfully and accurately.
- Maintaining complete, accurate and up to date list of all system account users and managers.
- Ensure that each user of the system has both a username and password and they understand logins are not to be shared or used by another person.
- Cancel any system account manager or users that are no longer representatives of the licensee.
- Obtain UID tags from the Department of Food and Agriculture or its designee and always maintain sufficient supply at all times

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- Ensure that all inventory is tagged and entered into the system as required by law and follow procedures established by Company.
- Correct any information entered in error within 3 days of discovery.
- Monitor all notifications from the Track and Trace System, identify and resolve all issues before dismissing notification

• **Company Procedures for Track and Trace Reporting** - Company requires detailed recording of any commercial cannabis activity by a system account manager or authorized personnel. All entries made to Track and Trace Database must be entered by a system account manager or authorized personnel with individual username and password. Any time one of the Commercial Cannabis Activities listed below occur the following procedures must be applied.

• **Receipt of Cannabis Material Procedures** - When Materials arrive at In-Take from Distribution, System Account Manager or Authorized Personal must accurately enter the following information into the Track and Trace Database before any testing or storing is done.

- IN TAKE RECEIPT OF CANNABIS MATERIAL
 - Supplier Name and License Number
 - Distributors Name and License Number
 - Date
 - UID
 - Type of Cannabis Material or Product
 - Weight or Count of Material Product

• **Transfer Receipt of Cannabis Products Procedures** - When Products are transferred in from licensed cultivator, manufactures or out to another licensed manufacture for further processing they must be moved through In-Take, where System Account Manager or Authorized Personnel must accurately enter the following information into the Track and Trace Database before being sent to Distribution.

- IN TAKE TRANSFER RECEIPT OF CANNABIS PRODUCT
 - Supplying Manufacturers Name and License Number
 - Distributors Name and License Number
 - Receiving Manufacturers Name and License Number
 - Date
 - UID
 - Type of Cannabis Material or Product
 - Weight or Count of Material or Product

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VIII. COMPANY GOOD MANUFACTURING PRACTICES

A. Company Staff Screening & Hiring Policies - The Company will comply with all state and federal employment laws including but not limited to; the California Fair Employment and Housing Act (CFEH), the Americans with Disability Act (ADA), the California Online Privacy Protection Act (California OPPA), and the California Labor Code, for all in the sourcing, recruiting and hiring of all employees.

1. Employment Advertisement Policy We will only Advertise for employee on platforms that cater to an audience of where at least X% of are over the age of 21. The content of our advertisements will not contain any discriminatory language and not be published in venues that may indicate a preference or limitation based on any protected category. The advertisement will be limited to 600 words describing the position and requirements, explaining specific duties involved, any benefits or intangibles, and a brief appealing description of the company and opportunity presented.

2. Employment Hiring Policy Any persons applying for employment must be at least 21 years of age. After age verification Applicant must complete a company application and pass Criminal Background Check from a third party hired by the Company, as well as participated and complete In-Person Interviews or any other Pre-Employment Testing that may arise from Company.

3. Procedures for New Employees - All Employees of the Company must have a complete file containing each item on the "New Employee Information Checklist" listed below. Authorized Hiring Personnel are responsible for completion of each action listed on the Checklist below.

a) New Employee Information File Checklist

- (1) Each employee hired by Company must complete all State Employment Forms for tax reporting purposes
- (2) Employee must complete an Emergency Contact Form
- (3) Employee must sign Confidentiality Form
- (4) Employee is assigned and Employment Identification Number
- (5) Employee picture is taken for Employee Identification Badge
- (6) Employee is given a tour of the premises
- (7) Employee is presented with Employee Handbook and signs receipt acknowledgment.

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B. Company Personnel Standards Policy - Company has set standards for all Personnel on Site to maintain the health and safety of everyone. These are presented to and accepted by all Employees at time of Hire and they acknowledge that any deviation is subject to immediate termination. The standards are detailed below.

1. Illness or Injury Reporting

- a) All Personnel are required to report any illness or open lesion to a supervisor immediately. Supervisor will make a decision to either send employee home, adequately dress the wound if applicable or exclude them from any manufacturing activities that may impose a threat of cross contamination of any cannabis products, contact surfaces or packaging materials.

2. Hygienic Practices

- a) All Personnel in direct contact with cannabis products are required to maintain personal hygiene to a level that will protect cannabis products, surface areas or packaging materials.
- b) Employees must wash hands thoroughly before work commences, after work commences, any time they leave work station and anytime hands have become soiled or contaminated. When wearing gloves they must be clean and intact.

3. Appropriate Attire

- a) Employees must wear appropriate clothing, remove all unsecured jewelry, remove hand jewelry that cannot be adequately sanitized when manipulating cannabis by hand, and other objects that could fall from body into cannabis products, equipment or containers.
- b) Employees when required must wear appropriate hair nets, headbands, beard covers in an effective manner.

4. Personal Belongings

- a) Employees are required to appropriately use designated areas when storing personal belongings, eating food, chewing gum, drinking beverages, and or using tobacco.

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C. Company Grounds Maintenance Policy - Company will hire a third party Landscape Contractor to maintain the landscape, exterior of buildings, *parking lots, and driveways on site (including street sweeping)*, as to defer any pests activity or possible contamination in areas where cannabis products are handled or transported.

1. Equipment Storage Procedures - Any equipment used for maintenance of the exterior must be cleaned and stored in designated Storage Room accessible from the exterior of Building. Access to the storage room will be granted by scanning Authorized Personnel Identification Badge.

2. Waste Treatment Systems and Draining Areas Use Procedures - Any human activity that requires amounts of water subject to pooling, stagnation, or has a contamination risk if it seeps into ground must be performed in the Designation Draining area. All water naturally occurring on the grounds has proper drainage to sewage. Any water used on site is run through the Water Treatment System on site.

D. Company Facility Construction and Design Policy - Throughout the site Company ensures dedicated areas designed accordingly to store equipment and materials necessary for sanitary operations and production of safe cannabis products. All designs will provide adequate space for movement of people and products. The space between and around all work stations, equipment, or machinery will be substantial for maintaining cleanliness as well as providing enough room for employees to perform duties. Adequate lighting will be installed in all areas where there is cannabis activity as well as hand washing areas, dressing or locker rooms and toilet facilities. Lighting in the areas where components or cannabis products are manufactured, processed, packed and held, plus all areas where equipment or utensils are cleaned will be shatter resistant. Ventilation and control equipment will be installed or used to control dust, odor, and vapors that may prevent or reduce chances of cross contact or contamination of cannabis products, cannabis product packaging materials, and cannabis product contact surfaces.

E. Company Sanitary Operations Policy - Company Maintenance Personnel are required to maintain sanitation and cleanliness of the facilities buildings and fixtures. Personnel are required to follow company procedures for cleaning and storing of equipment and utensils. Any toxic chemicals, sanitizing agents, or pesticides that are required for maintaining clean and sanitary conditions, required by equipment for use or maintenance, or used to protect premises from pests, they must be identified, held and stored in means that protect contamination of any cannabis products, cannabis product packaging, and cannabis product contact surfaces. Single Service Utensils such as paper cups, paper towels, or anything else intended for a one time use must be stored, handled

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and disposed of in a way that prevents contamination any cannabis products, cannabis product packaging, and cannabis product contact surfaces.

- F. Company Sanitary Facilities and Control Policy** - Facilities on site will be constructed to support the needs of personnel and production. The water supply will be meet or exceed the needs the operations intended and derived from a proper source. All plumbing installations support a strong flow of water in the quantity needed to the locations requiring water for operations and ensure no cross contamination or back flow between piping systems that carry water in or piping systems that convey sewage and liquid disposable waste from the facility through floor drainages. Toilet and Hand washing Facilities are accessible and kept clean for all usage by Personnel. Rubbish Disposal shall be conveyed, stored and disposed of so as to minimize development of odor, deflect attraction of pests, and protect against cross contamination of any cannabis products, cannabis product packaging, and cannabis product contact surfaces.
- G. Company Equipment and Utensils Policy** - All Equipment and Utensils used in the DISTRIBUTION of cannabis products must be designed and installed in such a way that cleaning, maintenance, and use - will not in any way contribute to cross contamination. Cannabis product contact surfaces must be made from non toxic materials, surface must be smooth, consistent, and non permeable as to prevent any accumulation of particles, thereby reducing the chances for unwanted growth of microorganisms that may contaminate any cannabis products. Any controlled temperature storage compartments are installed with an indicating thermometer, temperature measuring device or a temperature recording device. Any time compressed air or other gases are introduced to a cannabis product or clean its contact surfaces is treated properly as to not contaminate the products.
- H. Company Weights and Measures Policy** - Company only uses Weighing Devices that have been registered with the county sealer and that are approved, tested and sealed in compliance with the requirements in Chapter 5 of Division 5 of the Business and Professions Code. These Devices are required to be used each time cannabis or a cannabis product is; bought or sold by weight or count, packaged for sale by weight or count, weighed or counted for entry into Track and Trace Database. Company will obtain proper weighmaster licensing and certificates to meet requirements in Chapter 7 of Division 5 of the Business and Professions code, for bulk shipments of cannabis or cannabis products.

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IX. COMPANY PRODUCTION AND PROCESS CONTROLS

Company is in compliance with the standards set by the Department of Public Health under Chapter 13 Manufactured Cannabis Safety. The Policies and Procedures set forth are a reflection of the laws enforced and required by all personnel to follow with precision, any deviations are subject to immediate termination.

A. Quality of Raw Materials and Ingredients Policy - Company ensures that only top quality raw materials and ingredients are received and used in the manufacturing of cannabis and cannabis products. All Personnel are responsible to follow the procedures established by the Company to maintain safety of employees and produce safe cannabis products for consumers. When necessary Raw Materials that have any traces of soils or contaminants must be washed or cleaned in the designated areas that use filtered water. If Raw Materials have elevated levels of microorganisms that are injurious to public health, they must be pasteurized or treated otherwise to reduce the levels acceptable by the USFDA (United States Food and Drug Administration). In some cases Raw Materials or Ingredients may be susceptible to contamination with aflatoxin or other natural toxins, pests, or extraneous material, before they can be incorporated into finished cannabis products, Personnel must ensure though following company procedures, that these levels are within the acceptable limits set by the USFDA. Any frozen materials or ingredients will be stored in freezers and if thawing required before use, it must be handled in a way prevents spoiling. When allergens are present in any raw materials or ingredients, they must be stored and handled in ways to prevent cross contamination.

1. Raw Materials and Ingredients In-Take Procedures - All raw materials and ingredients are received from Distribution at Manufacturing In-Take and must follow the procedures process before being used.

(1) Complete In-Take Receipt - Enter in all information from the "IN-TAKE RECEIPT OF CANNABIS MATERIAL" form and enter into Track and Trace Database.

- | |
|--|
| (a) IN TAKE RECEIPT OF CANNABIS MATERIAL |
| (1) Supplier Name and License Number |
| (2) Distributors Name and License Number |
| (3) Date |
| (4) UID |
| (5) Type of Cannabis Material or Product |
| (6) Weight or Count of Material Product |

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(2) *Perform Inspection* - Personnel are required to visually and physically inspect all finished products after original receipt In-Take procedures are completed. Detailed Notes are taken on items condition, including, if it needs cleaning, if its quality has be compromised by any damage, or any other information deemed necessary by trained personnel to ensure quality processing. Document all findings of Inspection on "IN-TAKE INSPECTION LOG" supporting acceptance or rejection and enter into Track and Trace Database.

(a) IN-TAKE INSPECTION LOG

- (1) Date of Inspection
- (2) Inspector Name
- (3) Does the shipment manifest match delivered items?
- (4) Is the labeling and packaging correct?
- (5) Are there any obvious signs of compromised quality during transport?
- (6) Accept or Reject Items
- (7) Inspector Notes

(3) *Prepare Items for Transfer* - Place in containers that protect from deterioration or cross contamination, create and affix label for tracking, then store in secured designated Climate Controlled areas until they are transferred out to appropriate destination.

B. Company Product Recall Policy - For any Products that are deemed misbranded or adulterated, it is company policy for the Department to be notified within 24 hours. Company procedures for Product Recalls include, Determination Factors required to recall a product, Notification Protocols, Quarantine, and Destruction or Waste Disposal Requirements.

1. Product Recall Procedures

- a) Determine Factors that necessitate a recall
 - (1) If a product complaint investigation results in findings where the products defect is directly traced to the distribution process.
- b) Designate Personnel responsible for implementing recall procedures
- c) Notification Protocols
 - (1) Notification mechanisms (communication and out reach media) to contact customers or licensees that supplied or received the recalled product.

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- (2) Instructions for General Public and Licensees to return or destroy recalled product.

2. Product Recall Collection or Destruction Procedures

- a) Collection - Methods implemented by Company to collect recalled products may include but are not limited to; providing a drop off location, providing instructions for a pick up of products, or a mailing address where they could be mailed.
- b) Quarantine - Any products to be destroyed must be placed in quarantine for 72 hours. Any Bills of Landing, Shipping Manifests, or documents including the product information and Weight must be affixed to product. Company will notify the Department and understands all products held in quarantine are subject to audit by the department.
- c) Destruction - After the 72 hours cannabis product personnel must take measures to make the product "useable and unrecognizable". These actions must be done so on video surveillance. All products intended to be destroyed that contain any chemical, dangerous, or hazardous will be down so in accordance with federal, state, and local laws. Disposal of destructed recalled product must be made in designated secured area with waste receptacle under control of licensee. The following Information regarding the recalled product must be entered into the track and trace database; weight of product, reason for destruction, and date quarantine began. Disposal of cannabis waste must follow the standards outlined in Section (?) of Waste Management in this Manual.

C. Company Inventory Control Policy - Company has established an Inventory Control Plan consisting policies and procedures to accurately account for all cannabis and cannabis products including tracking the location and the disposition. Reconciliation of the Systems Database with all on-hand inventory will be preformed by one person and independently verified by a second person at least every 30 days. Company will preform and audit as soon as discrepancies between inventory and database are found and notify Department with in 24 hours of audit reveals more than a 5% discrepancy. Licensee will notify Department immediately if theft or diversion are suspected.

D. Company Waste Management Policy - Company has designed and outlined policies and procedures to ensure proper Waste Management practices. Determination of disposal type is made by licensee and disposed of in accordance with requirements of all state and local laws. Any waste that contains cannabis must be disposed of in designated secured area or designated secured waste receptacles under video surveillance and only accessible to authorized personnel. All cannabis products must be rendered unrecognizable and unusable prior to disposal and be entered into the track and trace system. Company will provide Department with required information of hauling or col-

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lection of Cannabis Waste by local agencies, franchisers, private permitted waste haulers, or self hauling.

a) Cannabis Waste Management Affiliate Information

- (1) Name of Entity Collecting
- (2) Obtain Documentation of Date and Time of waste collections
- (3) Copy of the Certified Weight Ticket or Receipt Confirmation from Waste Facility that is manned and fully permitted
 - i) solid waste landfill or transformation facility
 - ii) composting facility or operation
 - iii) in vessel digestion facility or operation
 - iv) transfer / processing facility or operation

E. Company Cannabis Products Policy - Company acknowledges responsibility of distributing regulated quality cannabis products that meet the Bureaus requirements. Company will not distribute any cannabis products outside of parameters (1-3) listed below for production. In the event of Failed Product Batches, Company will comply with the Bureaus Requirements set forth in parameter (4) listed below;

1. Prohibited Products are any products

- a) Containing Alcohol
- b) Containing any Non-Cannabinoid Additive that would increase potency, toxicity, or addictive potential. Any Additives that contain nicotine or non naturally occurring caffeine.
- c) Require being held at 41 Degrees Fahrenheit, excluding juices or beverages processed in accordance with regulations set by CDPH and CDFA.
- d) Juices that are not shelf stable
- e) Packed in a hermetically sealed container in a reduced oxygen package that produced a finished equilibrium PH greater than 4.6 and water activity greater than 0.85.
- f) Any Dairy Products prohibited by the Business and Professions Code Section 26001 Subsection (t), Excluding Butter from a licensed milk products plant or retail center infused with Cannabis and sold as a Cannabis Product
- g) Any Meat Products, excluding Dried Meat as prepared in accordance with the CDPH.
- h) Any Seafood Products
- i) Any products deemed by the Department to be attractive to children
- j) Any products deemed by the Department to be easily confused with commercially available food without cannabis.

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- k) Made in the shape of a human being, either realistic or caricature, animal, insect, or fruit.

2. Edible Products

- a) Shall not contain more than ten (10) milligrams of THC per serving
- b) Shall not contain more than one hundred (100) milligrams of THC per package
- c) Shall not contain any ingredient or component that is not approved by the USFDA, with the exception of cannabis, cannabis concentrate, or terpenes.
- d) Any Products that consist of than a single serving size, must be either
 - (1) scored, delineated, or otherwise marked to indicate one serving
 - (2) packaged so that a single serving is easily identifiable
- e) Containing multiple servings must be homogenized so each serving contains the same concentration of THC, within the variance established by Bureau.

3. Topical, Concentrate and Other Products

- a) Non Edibles shall not contain more than 1,000mg of THC per package for Adult-Use
- b) Non Edibles shall not contain more than 2,000mg of THC per package for Medicinal-Use
- c) Topical products must only contain ingredients permitted for Cosmetic Manufacturing in accordance under Title 21, Code of Federal Regulations.

4. Failed Product Batches Procedures

- a) When a Finished Product fails laboratory testing requirements or quality assurance reviews set forth by the Bureau it is deemed adulterated and may be embargoed.
- b) Failed products must be destroyed unless remediation or reprocessing is approved by Department.
- c) Remediation or Reprocessing of any failed product batches or use of failed harvest batches are required to meet all the requirements and procedures established by the Bureau and the CDPH.
- d) Edible products that have failed laboratory testing shall no be remediated or reprocessed, it must be destroyed.
- e) When incorrect labeling of THC limits is determined by laboratory testing of a product, a corrective action plan may be submitted to the Department for approval of relabeling.
- f) No remediation or reprocessing of a failed product batch or failed harvest batch may begin until after approval by the Department of Corrective Action Plans submitted by Licensee.

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- g) Any remediation or reprocessing of failed testing or failed quality assurance reviews for product batches or harvest batches shall be documented in the Manufactures Records..
- h) All remediated product batches and products produced therefrom must pass testing and quality review before retail sale.

F. Company Labeling and Packaging Policy - Company acknowledges the requirements needed to accept/release a finished product to a retailer and has established policies and procedures to comply with State Laws. All labeling must be written in English, unobstructed and conspicuous so consumers can read it, and placed on the outside of container or wrapper of the finished product to be sold at a retailer.

1. Primary Panel

a) PRIMARY PANEL LABELING REQUIREMENTS

- (1) Identity of Product in text size related to the most prominent printed matter on the panel
- (2) Universal Symbol
- (3) Net Weight or Volume
- (4) THC content and CBD content for entire package expressed in milligrams per package
- (5) Other Content information can be included as long as it verifiable by certificate of analysis from licensed testing laboratory.
- (6) Edible Products must be labeled with the words "cannabis-infused" located immediately above identity of product in bold print a text size larger than identity of product.
- (7) Edible Products must contain THC and CBD content per serving expressed in milligrams.

2. Informational Panel

a) INFORMATION PANEL LABELING REQUIREMENTS

- (1) Text must be in font point size 6 or larger, any supplemental labeling needed to meet requirements must be in font point size 8 or larger.
- (2) licensed manufacturer, contact number or website address
- (3) manufacturing date of product
- (4) this statement must be included "GOVERNMENT WARNING: THIS PRODUCT CONTAINS CANNABIS, A SCHEDULE I CONTROLLED SUBSTANCE. KEEP OUT OF REACH OF CHILDREN AND ANIMALS. CANNABIS PRODUCTS MAY ONLY BE POSSESSED OR CONSUMED BY PERSONS 21 YEARS OF AGE OR OLDER UNLESS THE PERSON IS A QUALIFIED PATIENT. THE INTOXICATING EFFECTS OF CANNABIS PRODUCTS MAY BE DELAYED UP TO TWO HOURS. CANNABIS USE WHILE PREGNANT OR BREASTFEEDING

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MAY BE HARMFUL. CONSUMPTION OF CANNABIS PRODUCTS IMPAIRS YOUR ABILITY TO DRIVE AND OPERATE MACHINERY.

- (5) When product is intended for sale in Medicinal-Use the statement "For Medicinal Use Only" must be on label.

- (6) All ingredients listed in descending order or predominance or weight by volume.
- (7) Any edible products that contains any major food allergens, label must read "contains..." with said allergens stated.
- (8) Edible Products must include the amount in grams, of sodium, sugar, carbohydrates, and total fat per serving.
- (9) Instructions for use, method of application or consumption and any preparation prior to use
- (10) Product expiration Date, "use by" date, or "best buy" date
- (11) UID and batch number if used

3. Labeling Restrictions

- a) The labels shall not contain any of the following
 - (1) Misrepresentative claims of products county of origin in the state of California.
 - (2) California County names unless cannabis used in product was grown there.
 - (3) Content or Design that is attractive to children
 - (a) Cartoons
 - (b) Similar images, characters, or phrases popular in children advertisements
 - (c) Imitation of Candy packaging or labeling
 - (d) Terms "candy" or "candies"
 - (4) False or misleading information
 - (5) Health Related statements that are untrue, misleading, or have unsupported evidence to such claims.

4. Statement of Potential Effects

- a) Statement may be included on the Information Panel if the Manufacturer has substantial information supporting the truth of such potential effects.

5. Universal Symbol

- a) Primary Panel must include the symbol and replicate its form and color
- b) Symbol size must be at minimum, half inch (.5) by half inch (.5)

6. Packaging Requirements

- a) the Package shall
 - (1) protect product from contamination
 - (2) not expose product to toxic or harmful substances

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- (3) have a Tamper-Evident Seal
- (4) child resistant by satisfying standards of "special packaging" set forth in the Poison Prevention Packaging Act of 1970.
- (5) not imitate packaging typically marketed to children
- (6) be opaque for Edible Products
- (7) For multi serving products, package must be able to be re-sealed and remain child-resistant