

METRO HARVEST, INC.
EMPLOYEE HANDBOOK

**292 Bedford St.
Bridgewater, MA 02324**

April 2019 Edition

EMPLOYEE HANDBOOK
METRO HARVEST, INC.

EXECUTIVE LEADERSHIP TEAM	4
SECTION I – FEDERAL, STATE AND LOCAL REGULATIONS	5
Equal Employment Opportunity	5
Employment Eligibility	5
Americans with Disabilities Act (ADA) & Religious Accommodations	5
Harassment	6
Sexual Harassment	6
Complaint Procedure	7
Employment Status	8
SECTION II – PERSONNEL POLICIES	9
Employee Registration	9
Attendance	9
Forced Closures Due to Inclement Weather	9
Meal and Rest Breaks	10
Dress Code	10
Drug Free Workplace	10
Employment on An At-Will Basis	11
Electronic Communications	11
Employee Privacy	12
Employee / Personnel Records	13
Patient Confidentiality	13
Occupational Safety Program	14
Entering and Leaving the Premises	15
Whistleblower Policy	15
SECTION III – SALARY ADMINISTRATION	18
Holidays	18
Overtime Policy	18
Pay Procedures	19
Direct Deposit	19
SECTION IV – BENEFITS	19
Health Insurance	19
COBRA	20

EMPLOYEE HANDBOOK
METRO HARVEST, INC.

Section 125 Plan	20
Retirement Plan	20
Leaves of Absence	21
Family Medical Leave Act (FMLA)	22
Sick Leave	23
Workers' Compensation	24
SECTION V – RESIGNATION AND TERMINATION	24
Resignation and Termination Policies	24
Exit Interview	25
EMPLOYEE ACKNOWLEDGEMENT FORM	25

Letter to the Employees of Metro Harvest

Thank you for joining the Metro Harvest Team herein referred to as MH! We hope you agree that you have a great contribution to make to the Cannabis industry by way of MH, and that you will find your employment with us a rewarding experience. We look forward to the opportunity of working together to create a more successful business in this progressive industry. We also want you to feel that your employment with Metro Harvest will be a rewarding and mutually beneficial experience.

You have joined an organization that works hard to create an outstanding reputation for quality, commitment, innovation, integrity and community. Credit for this goes to everyone in the organization. We hope you will also find satisfaction and take pride in your work here. As a member of the Metro Harvest Team, you will be expected to contribute your talents and energies to further improve the environment and quality of MH.

This Employee Handbook will provide answers to most of the questions you may have about Metro Harvest benefit programs, as well as MH company policies and procedures. You are responsible for reading and understanding all of the content in this Employee Handbook. Should there be further questions, please feel free to discuss with Management.

We extend to you our personal best wishes for your success at Metro Harvest!

Sincerely,

Stephen LaBelle, Thomas Gosselin, and Jill Stucchie

Executive Leadership Team

SECTION I – FEDERAL, STATE AND LOCAL REGULATIONS

Equal Employment Opportunity

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at MH will be based on merit, qualifications, and abilities. MH does not discriminate in employment opportunities or practices on the basis of race, color, religion, sex, national origin, sexual orientation, ancestry, protected disability, age, or any other characteristic protected by law.

This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training.

Any Employees with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their manager. Employees can raise concerns and make reports without fear of reprisal. Anyone found to be engaging in any type of unlawful discrimination will be subject to disciplinary action, up to and including termination of employment.

Employment Eligibility

MH complies with all federal and state immigration laws and regulations and is committed to providing a workplace free from discrimination, including discrimination based on national origin or citizenship status. To meet these obligations, MH will verify employment eligibility of all new hires and re-verify such eligibility as required by law.

All new Employees must complete and sign Section One of Federal Form I-9 at the time of hire. MH will furnish new Employees with this form. Employees are required to provide MH with documentation of identity and employment eligibility within 3 business days after their employment starts. MH will only accept identity and employment eligibility documents as listed on Form I-9 that appear to be genuine (e.g. United States passport; birth certificate, etc.). Please note that payroll cannot begin until Form I-9 is completed.

Americans with Disabilities Act (ADA) & Religious Accommodations

MH is committed to complying fully with the Americans with Disabilities Act (ADA) and ensuring opportunity in employment for qualified persons with disabilities. All employment practices and activities are conducted on a non-discriminatory basis.

Reasonable accommodation is available to all disabled Employees, where their disability affects the performance of job functions. All employment decisions are based on the merits of the situation in accordance with defined criteria, not the disability of the

individual.

Qualified individuals with disabilities are entitled to equal pay and other forms of compensation (or changes in compensation) as well as in job assignments, classifications, organizational structures, and position description. Leave of all types will be available to all Employees on an equal basis.

MH is also committed to avoiding all forms of discrimination against any qualified applicants because they are related to or associated with a person with a disability. MH will follow any state or local law that provides individuals with disabilities greater protection than the ADA.

This policy is neither exhaustive nor exclusive. MH is committed to taking all other actions necessary to ensure equal employment opportunity for persons with disabilities in accordance with the ADA and all other applicable federal, state, and local laws.

The Company will make reasonable accommodation for Employees whose work requirements interfere with a religious belief, unless doing so poses undue hardship on the Company. Employees needing such accommodation are instructed to contact their supervisor or Human Resources.

Harassment

MH is committed to maintaining a positive working environment free of unlawful harassment and which is sensitive to the diversity of its Employees. In doing so, the Company prohibits sexual harassment and harassment because of age, race, sex, color, religion, national origin, disability, or any other legally protected status. Unlawful harassment includes verbal or physical conduct that has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment. Prohibited behavior includes but is not limited to the following:

- Written form such as cartoons, e-mail, posters, drawings, or photographs.
- Verbal conduct such as epithets, derogatory comments, slurs, or jokes.
- Physical conduct such as assault, or blocking an individual's movements. This policy applies to all Employees including managers, supervisors, co-workers, and non-Employees such as customers, clients, vendors, consultants, etc.

Sexual Harassment

Because sexual harassment raises issues that are to some extent unique in comparison to other harassment, the Company believes it warrants separate emphasis. MH prohibits sexual harassment and inappropriate sexual conduct.

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, when:

- Submission to such conduct is made explicitly or implicitly a term or condition of employment.
- Submission to or rejection of such conduct is used as the basis for decisions affecting an individual's employment.
- Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

All Employees are expected to conduct themselves in a professional manner at all times. Inappropriate sexual conduct that could lead to a claim of sexual harassment is expressly prohibited by this policy. Such conduct includes, but is not limited to, sexually implicit or explicit communications whether in:

- Written form, such as cartoons, posters, calendars, notes, letters, e-mail and texts.
- Verbal form, such as comments, jokes, foul or obscene language of a sexual nature, gossiping, or repeated unwanted requests for dates. Physical gestures and other nonverbal behavior, such as unwelcome touching, grabbing, fondling, kissing, massaging, and brushing up against another's body.

Complaint Procedure

If you believe there has been a violation of the policies as outlined in this handbook, please contact your direct supervisor or Human Resources with your concerns. The Company expects Employees to make a timely complaint to enable the Company to investigate and correct any behavior that may be in violation of these policies. Retaliatory action of any kind against an employee for filing a complaint is prohibited.

MH has established the following procedure for lodging a complaint of harassment, discrimination or retaliation. The company will treat all aspects of the procedure confidentially to the extent reasonably possible.

1. Complaints should be submitted as soon as possible after an incident has occurred by completing in writing the MH Harassment Complaint Form.
2. Upon receiving a complaint or being advised by a supervisor or manager that violation of this policy may be occurring, The Human Resources Manager will be notified and will share the complaint with the CEO.
3. The Human Resources Manager will task the Director of Security with the responsibility for initiating an investigation to determine whether there is a reasonable basis for believing that the alleged violation of this policy occurred.
4. If necessary, the complainant and the respondent will be separated during the course of the investigation, either through internal transfer, shift changes, or

administrative leave.

5. During the investigation, the security director, together with legal counsel or other management employees if necessary, will interview the complainant, the respondent and any witnesses to determine whether the alleged conduct occurred.
6. Upon conclusion of an investigation, the security director or other person(s) conducting the investigation will submit a written report of his or her findings to the Human Resources Manager and the CEO. If it is determined that a violation of this policy has occurred, the Security director will recommend appropriate disciplinary action. The appropriate action will depend on the following factors:
 - a) the severity, frequency and pervasiveness of the conduct;
 - b) prior complaints made by the complainant;
 - c) prior complaints made against the respondent; and
 - d) the quality of the evidence (e.g., firsthand knowledge, credible corroboration).

If the investigation is inconclusive or if it is determined that there has been no violation of policy, but potentially problematic conduct may have occurred, the Security director may recommend appropriate preventive action.

7. Senior management will review the investigative report and any statements submitted by the complainant or respondent, discuss results of the investigation with the Security director and other management staff as appropriate, and decide what action, if any, will be taken.
8. Once a final decision is made by senior management, the Security director will meet with the complainant and the respondent separately and notify them of the findings of the investigation. If disciplinary action is to be taken, the respondent will be informed of the nature of the discipline and how it will be executed.

Employment Status

Upon being hired at MH, all Employees will become either a Regular Full-Time or a Regular Part-Time Employee upon completion of a 90-day introductory period.

For the sole purpose of determining the allowance of certain benefits, Employees are classified as:

- (i) Regular Full-Time Employee – An Employee who is scheduled to work an average of 30 or more hours per week on a regular and continuous basis. Regular Full-Time Employees are eligible for the following benefits:
 - i. Health Insurance / COBRA
 - ii. Bereavement Leave
 - iii. Military Leave
 - iv. Maternity Leave

EMPLOYEE HANDBOOK
METRO HARVEST, INC.

- v. Small Necessities Leave
- vi. Domestic Abuse Leave
- vii. Jury Duty Leave
- viii. Sick Leave
- ix. Worker's Compensation
- x. (once implemented) Retirement Plan

- (ii) Regular Part-Time Employee – An Employee who is scheduled to work less than an average of 30 hours per week.

SECTION II – PERSONNEL POLICIES

Employee Registration

All MH Employees are required to complete the CCC issued paperwork in order to register with the MMJ Online System and obtain a registration card. Employee registration cards are valid for one year from the date of issue and must be renewed in order to be employed by MH. Changes to information (e.g. address, name change, etc.) must be reported to the CCC within five (5) business days.

In addition, all MH Employees are required to submit to a CORI report at the time of employment and on an annual basis. On-going employment is subject to the Employee's ability to meet Employee registration requirements set forth by the CCC. Criminal Offender Record Information (CORI) reports will be kept separately from the Employee's personnel record. When you applied for the registration, you agreed to uphold the Massachusetts Regulations in reference to the Marijuana Industry and as an employee of Metro Harvest you are REQUIRED to follow all compliance procedures that both the State of Massachusetts and Metro Harvest have established. Any and all violations of the Massachusetts CCC, Medical Use of Marijuana Program and CCC Regulations will result in immediate termination from Metro Harvest.

Attendance

Employees are required to be at work for their scheduled start time. If Employees anticipate being late, their manager should be notified prior to the scheduled start time. Employees are asked to arrive at work no more than 15 minutes early unless previously discussed with manager.

Sick Employees should notify their manager prior to the start of the work day (preferably the night before or sooner if possible) if they are unable to come to work due to illness.

"No call no shows" may be cause for termination.

Forced Closures Due to Inclement Weather

EMPLOYEE HANDBOOK
METRO HARVEST, INC.

Unless notified by your supervisor, you are to report to work on all regularly scheduled days, regardless of weather conditions. If you are unable to report to work due to weather conditions, you must notify your supervisor in accordance with our attendance and punctuality policy.

Meal and Rest Breaks

The Company recognizes the importance of taking "breaks" during the workday. It gives Employees a chance to take a short rest or to grab a cup of coffee or something to eat. Paid "breaks", not to exceed 10 minutes, are normally provided during the workday for those Employees who have been scheduled for at least four consecutive hours. During these breaks you must stay on company premises. If you chose to leave company premises while taking a break you must first clock out. Failure to comply with this policy will not be tolerated. Check with your immediate supervisor/manager as to when it would be appropriate to take your "breaks".

In addition to "breaks" each employee who is scheduled for more than 5 consecutive hours is entitled to time off for lunch. This is usually 30-60 minutes in duration and is unpaid. When taking your lunch break you must clock out. Check with your immediate supervisor/manager as to when it would be appropriate to take your meal break.

Dress Code

Employees represent the image MH presents to patients and visitors. During hours of operation, employees are expected to present a clean and neat appearance and to dress according to the requirements of their positions. Some positions require uniforms. All Employees understand that uniforms may become mandatory if not already mandatory. Growers must take showers and wash hair thoroughly before each shift in order to effectively prevent contamination in the cultivation facility. Fit tests will be confirmed which may require you to shave facial hair. Employees may be asked to wear gloves, hair nets, beard nets, scrubs, work shoes, etc. in order to maintain an effective integrated pest management program as determined by leadership.

Drug Free Workplace

It is MH's desire and intent to provide a drug-free, healthful, and safe workplace for all Employees. To promote this goal, Employees are required to report to work in appropriate mental and physical condition to perform their jobs in an exemplary and professional manner. This policy is violated when Employees engage in the use and/or possession of illegal drugs and when they abuse alcohol and other legal or illegal drugs.

Thus, while on the premises of MH, Employees may not use, possess, distribute, sell or be under the influence of alcohol or illegal drugs.

Working while engaged in the legal use of prescribed drugs is allowed only to the extent that the Employee's ability to perform the essential functions of the job effectively and in a safe manner is not impaired and that other individuals in the workplace are not endangered. The Employee should notify their manager whenever the use of legal drugs for medical purposes may impair the Employee's performance, safety, and/or judgment so that the appropriate accommodations can be made.

Violations of this policy may lead to disciplinary actions, up to and including immediate termination of employment, and/or required participation in a substance abuse rehabilitation or treatment program. Such violations may also have legal consequences.

Employment on An At-Will Basis

All Employees of MH, regardless of their classification or position, are employed on an at-will basis. This means that each Employee's employment is terminable at the will of MH or the Employee at any time, with or without cause and with or without notice.

Furthermore, nothing contained in the policies, procedures, handbooks, manuals, job descriptions, application for employment, or any other document of the company shall in any way create an express or implied contract of employment or an employment relationship other than an at-will basis.

Electronic Communications

MH uses various means of electronic communications in its normal course of business. The purpose of this policy is to describe MH's general rules regarding use of electronic communications.

E-mail: MH operates a corporate e-mail system through G-Suite. Employees must use MH's email system to create, send, receive, and store all work related emails; they cannot use personal email accounts to create, send, receive, or store work related email for any purposes.

MH's Employees should not expect any privacy when using the corporate email system and are expected to abide by MH's harassment policy and any other applicable policies when sending emails over the corporate email system.

Internet: MH expects that access to the Internet will be used primarily for business-related activities. Employees should not expect any privacy when accessing Internet websites. MH reserves the right to block certain Internet websites that are not work related.

EMPLOYEE HANDBOOK
METRO HARVEST, INC.

MH Employees may not knowingly transmit, receive, or store any communication that; (i) is discriminatory, harassing, defamatory, or otherwise prohibited by federal law, (ii) appears derogatory and/or obscene to anyone, (iii) is a chain letter, joke, solicitation, offer to buy/sell goods, or other non-business related material of frivolous or trivial nature, and/or (iv) reveals company trade secrets, confidential information regarding patients, or other information that could harm MH or any of its affiliates. All growing techniques must not be disclosed to anyone for any purposes without prior COO and/or CPO approval.

Social Media: Employees use of social media (e.g. Facebook, MySpace, message boards, personal blogs, etc.) is limited to work related activities in designated areas during work hours unless directed by manager. MH recognizes that Employees may own various forms of electronic communications equipment (e.g. cell-phones, etc.) that provide access to the Internet and social media websites. Employees are forbidden from making any posts from work on social media without express written consent.

Employees who use social media to comment about work and co-workers should be mindful of their responsibilities towards MH and fellow co-workers at all times. Once content is posted online, it is no longer under the author's control. MH strives to maintain a professional work environment and considers harassment in all forms to be a serious offense in violation of MH's harassment policy.

Cell phone use is limited to emergency related situations in any work-related area. Taking pictures or videos of any work-related areas are strictly prohibited and are grounds for immediate termination.

Employees that violate MH's electronic communications policy are subject to discipline, up to termination. Additionally, Employees who use MH's electronic communications systems for illegal or fraudulent purposes are subject to legal action by appropriate local, state and federal authorities.

Employee Privacy

In collecting, maintaining, and disclosing personal information, MH makes every effort to protect Employees' privacy rights and interests and prevent inappropriate or unnecessary disclosures of information from any worker's file or record.

MH treats personal information about Employees as confidential and respects the need for protecting each Employee's privacy by enforcing secure information handling procedures on the part of all personnel whose job duties involve gathering, retaining, using, or releasing personal information about MH Employees.

On occasion, MH must provide information from its personnel records and files to federal, state, and local government agencies in accordance with reporting requirements

imposed by such agencies. In the event a government agency requests information beyond which it normally requires, MH ordinarily advises the affected Employees of the agency's request unless the request occurs in the course of an agency investigation or if an agency asks MH to keep such a request confidential.

In response to an information request from an outside organization or individual, MH normally verifies only the employment status and dates of employment for former or present Employees. MH does not provide any other information unless and until it receives a written request from the Employee or former Employee.

Employee / Personnel Records

As required by the CCC, MH will maintain a personnel record for each dispensary Employee. MH will maintain personnel records for a minimum of 12 months after the Employee's affiliation with MH concludes. At a minimum, the personnel record will contain the following:

- (i) Documents submitted to the CCC for the purposes of obtaining/maintaining Employee registration;
- (ii) Documentation of verification of references;
- (iii) Job description that details duties, authority, responsibilities, qualifications, and supervision;
- (iv) Offer letter or employment contract;
- (v) Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the Employee indicating the date, time and place the training was received, the topics discussed and the name and title of the presenter(s);
- (vi) A copy of the application that MH submitted to the CCC on behalf of the prospective Employee;
- (vii) Documentation of periodic performance evaluations; and
- (viii) A record of any disciplinary action taken.
- (ix) Note: CORI reports will be maintained separately from an Employee's personnel record.

Patient Confidentiality

MH is committed to providing our patients and their caregivers with the best possible service. It is imperative that all issues regarding our patients are held in strict confidence.

- (i) All Employees agree that any and all files, lists and computer files belong to and are the sole and exclusive property of MH. All information found in patient charts, files, lists, and computer files are confidential and constitute trade secrets of MH. All Employees further promise not to disclose any such information to any other person and shall not share such information other than in connection with their employment at MH.

EMPLOYEE HANDBOOK
METRO HARVEST, INC.

- (ii) All personal data and medical notes are highly confidential and may not be communicated to anyone without the patient's written consent.
- (iii) No patient records or other written materials are to be left on the counters or open on the computer screens where confidentiality could be compromised.
- (iv) Do not discuss a patient's illness with any staff member who does not need to know.
- (v) Do not discuss the medical treatments or personal information of patients outside of MH.
- (vi) Loose talk that others overhear can be the basis for a defamation or invasion of privacy suit. Speak softly or privately with patients so that others do not overhear.
- (vii) All Employees must understand that the violation of a patient's privacy is support for immediate termination and must sign a form pledging confidentiality of patient information. This signed form will become a part of the Employee's personnel record.
- (viii) Only release a copy of patient records when a patient submits a written request specifying whether a portion of or all of the records are needed. The request must show the date, to whom, and to where a copy/copies are being sent and should be added to the patient's record immediately.
- (ix) Do not remove or make copies of any patient records or of business records, reports or documents without express permission from management.
- (x) Upon termination, Employees are required to return any property in their possession that belongs to MH. Employment with MH assumes an obligation to maintain confidentiality even after leaving MH.

Because any violation of confidentiality could seriously injure MH's reputation and effectiveness, any unauthorized disclosure of confidential information or divulging any information to anyone outside MH concerning MH or its patients is cause for immediate dismissal.

Occupational Safety Program

Safety is a top priority at MH. To assist in providing a safe and healthful work environment for Employees, patients and visitors, MH has established workplace safety programs. (See Workplace Safety Manual)

MH provides information to Employees about workplace safety and health issues through internal communication channels such as Employee meetings, bulletin board postings, memos, or other written communications.

Each Employee is expected to obey safety regulations and to exercise caution in all work activities. Employees must immediately report any unsafe condition to the appropriate manager. Employees who engage in unsafe behavior, who cause hazardous or dangerous

situations, or who fail to report, or, where appropriate, remedy such situations, may be subject to disciplinary action, up to and including termination.

In the case of accidents that result in injury, regardless of how insignificant the injury may appear, Employees should immediately notify any member of the MH management team. Such reports are necessary to comply with laws and initiate insurance and workers' compensation benefits procedures.

Entering and Leaving the Premises

At the time you are hired, your supervisor will advise you about the proper entrances and exits for our Employees, as well as unauthorized areas, if any. CCC prohibits unescorted or unauthorized visitors in our facilities without them signing the Visitor's Log with their name, contact information, purpose of visit, time in and out. If you are expecting visitors, such as clients, customers or friends, please notify your supervisor. You are expected to abide by these rules at all times. Failure to do so will not be tolerated. MH does not tolerate acts of workplace violence committed by or against Employees. MH strictly prohibits Employees from making threats or engaging in violent acts. Prohibited conduct includes, but is not limited to: (i) injuring another person physically, (ii) engaging in behavior that creates a reasonable fear of injury in another person, (iii) engaging in behavior that subjects another individual to extreme emotional distress, (iv) threatening to injure an individual or damage property and (v) committing acts motivated by, or related to sexual harassment.

Employees are prohibited from carrying weapons while on duty. In addition, MH Employees who hold a license to carry a concealed weapon are prohibited from carrying a weapon while on duty. This is a zero-tolerance policy; meaning MH disciplines or terminates every Employee found to have violated this policy.

Security Checks / Integrity / Theft

Metro Harvest may exercise its right to inspect all packages, personal bags, and parcels entering and leaving our premises. It is important that Employees uphold a standard of honesty and integrity at all times. These are values important to our Company's existence. Carefully follow all Company procedures concerning inventory control, handling cash receipts, expense reporting, and maintenance of a secure workplace. Dishonesty and theft are not tolerated. If you witness an act of dishonesty, theft, or pilferage, report the incident immediately to a manager or supervisor.

Whistleblower Policy

If an Employee believes or has knowledge that an MH Employee is engaging in illegal activities while at work, including but not limited to diverting or stealing marijuana or marijuana products, falsifying records, stealing cash, or any other activity which

jeopardizes MH's assets or Employees, they should immediately report the incident to the Chief Operations Officer and/or Chief Executive Officer. Illegal activities by others with whom MH has a relationship (including but not limited to vendors, independent contractors, patients, etc.) should also be reported immediately.

Investigations will be completed as discreetly and confidentially as is determined to be practical. If it is determined that an Employee engaged in illegal or prohibited activity, MH will take appropriate disciplinary measures against the offending Employee(s). Disciplinary measures include, but are not limited to warnings, suspensions, termination or prosecution. Employees who report violations and/or cooperate with an investigation will not be subject to retaliation. Employees recognize and acknowledge that compliance with this policy is a condition of each Employee's employment. Employees are encouraged to raise any questions and/or concerns about this policy with their manager or the Chief Executive Officer.

Confidential Information

Employees of the Company may have access to confidential information of the Company and our clients. Confidential information refers to any information that is not generally known or accessible by the public. Disclosure of confidential information might seriously damage the Company's competitive position and therefore such action will not be tolerated. This non-disclosure applies during and after an employee's employment. Any copying, reproducing, or distributing of confidential information in any manner must be authorized by management. Confidential information remains the property of MH and must be returned to the Company on demand.

Conflict of Interest

Employees must conduct business without creating any conflict of interest. A conflict of interest can arise when an employee is involved in activity for personal gain, which for any reason is in conflict with the Company's business interests. Employees cannot solicit or compete with the Company's product or service offerings. Outside work cannot be performed on the Company's time. Employees cannot use the Company's equipment, materials, resources, or "inside" information for outside work. Employees should not solicit business or clients or perform outside work on the Company's premises. Employees and their immediate family must be free of any significant investment or association with competitors or suppliers that might interfere or appear to interfere with Company interests. Employees should notify Human Resources should any conflicts arise.

Non-Circumvention and Non-Solicitation

During the term of your employment with Metro Harvest and for a period of 12 months after the termination of your employment with us, you will not, directly or indirectly,

whether alone or as a partner, officer, director, employee, consultant, Employee or equity holder: (a) attempt in any manner to commercially circumvent, avoid, bypass or hinder MH in any transaction with any of our customers or prospective customers, (b) attempt in any manner to commercially exploit, compete with, or circumvent our existing or proposed business concepts, plans and/or business contacts, or (c) engage in any business or other activity with any individual or entity that competes directly with us. During the term of your employment with us and for a period of 12 months thereafter, you will not directly or indirectly induce or attempt to induce: (a) any person who is an MH Employee, officer or director to terminate such person's employment or board membership with us, (b) any of our strategic partners, collaborators, customers, suppliers, vendors, contractors or other parties, to terminate or reduce their relationship with us, or (c) any person who is proposing to become a person referred to above from becoming such a person.

Personal Relationships in the Workplace

The employment of relatives or individuals involved in a dating relationship in the same area of an organization may cause serious conflicts and problems with favoritism and Employee morale. In addition to claims of partiality in treatment at work, personal conflicts from outside the work environment can be carried over into day-to-day working relationships. For purposes of this guideline, a relative is any person who is related by blood or marriage, or whose relationship with the Employee is similar to that of persons who are related by blood or marriage such as parties to civil unions. A dating relationship is defined as a relationship that may be reasonably expected to lead to the formation of a consensual relationship. This guideline applies to all Employees without regard to the gender or sexual orientation of the individuals involved. Relatives of current Employees may not occupy a position that will be working directly for or supervising their relative.

Individuals involved in a dating relationship with a current Employee may also not occupy a position that will be working directly for or supervising the employee with whom they are involved in a dating relationship. The Company also reserves the right to take prompt action if an actual or potential conflict of interest arises involving relatives or individuals involved in a dating relationship who occupy positions at any level (higher or lower) in the same line of authority that may affect the review of employment decisions.

If a relative relationship or dating relationship is established after employment between Employees who are in a reporting situation described above, it is the responsibility and obligation of the supervisor involved in the relationship to disclose the existence of the relationship to management. The individuals concerned will be given the opportunity to decide who is to be transferred to another available position. If that decision is not made within 30 calendar days, management will decide who is to be transferred or, if necessary, terminated from employment. In other cases where a conflict or the potential for conflict arises because of the relationship between Employees, even if there is no line of authority or reporting involved, the Employees may be separated by reassignment or

terminated from employment. Employees in a close personal relationship should refrain from public workplace displays of affection or excessive personal conversation.

Open Door Policy

Employees who disagree or are dissatisfied with a Company practice should promptly discuss the matter with their immediate supervisor/manager, where appropriate. Normally, this discussion should be held in a timely manner. Discussions held in a timely manner will enhance our ability to resolve concerns while it's fresh in everyone's mind. The majority of misunderstandings can be resolved at this level. If the solution offered is not satisfactory, or if it is inappropriate to go to the supervisor, then Employees are encouraged to take the problem to Human Resources. If the problem still cannot be resolved, Employees may submit a written complaint to the Human Resources Department for review and final decision about the situation. Also see the EEO/Harassment Complaint Procedure.

SECTION III – SALARY ADMINISTRATION

For payroll purposes, Employees will be classified as one of the following:

- (i) Exempt Employees – Certain Employees such as executive and administrative Employees are paid on a salary basis for all hours worked each week. These Employees are expected to work whatever hours are required to accomplish their duties, even if it exceeds a 40-hour workweek. No overtime pay will be paid to exempt Employees.
- (ii) Non-Exempt Employees – All Employees who are not identified as exempt Employees are considered non-exempt Employees. Non-exempt Employees are eligible for payment of overtime premium pay.

Holidays

MH anticipates being open on most traditional U.S. holidays with the exception of the following holidays, subject to the needs of the Employee's department:

New Year's Day
Thanksgiving Day
Christmas Day

Holidays that fall on a Saturday or Sunday will be observed on a Friday or Monday, respectively. In addition, MH will make a good faith effort to accommodate religious holidays upon request.

Overtime Policy

Full-time non-exempt (hourly) Employees may occasionally be asked to work more than 40 hours in a given work week. Each work week is considered separately in computing overtime pay. The Employee's manager must approve such overtime work, which is undertaken only when necessary, in advance. The Employee will be compensated for overtime hours worked at the rate of 1.5x the Employee's base rate of pay. Working unapproved overtime may be cause for disciplinary action.

In 2018, non-exempt, retail Employees (Employees assigned to work the dispensary floor) who work on Sundays and/or restricted holidays (Memorial Day, Independence Day, Labor Day, Columbus Day after 12:00 noon, and Veteran's Day after 1:00pm) will be paid 1.5x their regular pay rate for the time worked on those days in 2018. Beginning in 2019 and for the next three years the additional pay rate will fall as follows: 2019 = 1.4x; 2020 = 1.3x; 2021 = 1.2x; and 2022 = 1.1x per State of MA regulations.

Pay Procedures

MH Employees are paid bi-weekly, on Friday. If a regularly scheduled payday falls on a holiday, Employees are paid on the last regular workday immediately preceding the holiday.

Federal and state withholding taxes and Social Security taxes are deducted from every paycheck. Voluntary deductions for health care benefits, retirement plan deferrals, and the like can be made after an Employee completes the necessary authorization forms. MH deducts court-ordered garnishments for personal debts – such as child support – without the Employee's prior authorization. MH can also make deductions for federal and state taxes without prior authorization.

Employees should report a lost or stolen paycheck to their manager immediately. MH will issue a new paycheck to the Employee after payment is stopped on the original check. However, if a check is lost through no fault of MH and MH is unable to stop payment on the check, MH is not obligated to compensate the Employee for the loss.

Direct Deposit

MH requires all Employees to participate in the Direct Deposit Program. A standardized procedure is used to verify account numbers and account types before an actual electronic transfer occurs. Employees will be asked to complete a direct deposit form during new hire orientation. Employees will be provided a paystub each pay period.

SECTION IV – BENEFITS

Health Insurance

MH offers Employees the opportunity to participate in its group health insurance program. Employees can select an individual or family coverage. All full-time, benefit-eligible Employees are eligible for health insurance following a 90-day introductory period. Up until an Employee's first two-years of employment, MH will reimburse 50% of their health insurance premium for individual coverage and 33% for family coverage. In year's two-five of an Employee's employment, MH will reimburse 75% of their health insurance premium for individual coverage and 50% for family coverage. In year's five+ of an Employee's employment, MH will reimburse 100% of their health insurance premium for individual coverage and 100% for family coverage.

COBRA

Full-time Employees who leave MH for any reason other than gross misconduct may extend their medical coverage for themselves and their immediate family members for up to 18 months, unless they leave MH because they become disabled (then they have up to 29 months) or die, become divorced or legally separated, or participate in Medicare (then they have 36 months).

If Employees elect to use COBRA, they must notify MH in writing within 60 days of termination. Employees must pay 100% of the premium in addition to a 2% administrative fee.

All premiums must be pre-paid for each month of extended coverage. Failure to pre-pay the premium will result in the termination of medical insurance coverage. Coverage will also be terminated should MH terminate coverage for all Employees, or if the Employees become eligible for coverage under another group medical insurance plan.

All requests for COBRA should be received in writing. Requests to terminate coverage should also be submitted in writing.

Section 125 Plan

As required under Section 125 of the Internal Revenue Code, MH offers a Section 125 program to all eligible Employees. Participation in the program allows Employees to contribute pre-tax dollars to pay their health insurance premiums. Thus, eligible Employees do not pay federal and state income tax or social security tax on dollars deducted from their pay to cover health insurance premiums. Participation in the program is voluntary.

Retirement Plan

When deemed financially viable by MH's Executive Team, MH plans to implement a retirement plan (i.e. 401(k), Simple IRA Plan) which will be an optional benefit for all Employees. The purpose of this benefit is to afford to all eligible Employees the opportunity to make contributions towards their retirement while deferring federal income taxes on the amounts contributed, and to reward eligible Employees for long and loyal service by providing them with retirement benefits.

As a participant, Employees may elect to contribute through payroll deductions. The total elective deferral in any calendar year may not exceed a dollar limit set by law.

To be eligible, an Employee must have completed one year of service, and have worked a minimum of 1,000 hours. Upon completion of this requirement, Employees will receive an enrollment packet.

Leaves of Absence

Bereavement Leave: Benefit-eligible Employees are allowed up to three days of paid leave for the death of a father, mother, spouse, child, brother, sister, father-in-law, mother-in-law, sister-in-law, or brother-in-law.

Military Leave: An Employee who is a member of a military reserve unit is entitled to unpaid leave in order to fulfill military training requirements and obligations. Military leave will not affect the Employee's status, seniority, wages, PTO, bonus, advancement or any other advantages of employment.

Maternity Leave: MH will grant eight weeks of unpaid leave to a pregnant Employee or an Employee adopting a child under 18 years of age (or under 23 if the child is disabled).

The following conditions must be met to be eligible for maternity leave: (i) the Employee must have been employed on a full-time basis for a minimum of three months; (ii) the Employee must provide two weeks' written notice of the anticipated date of departure and state in writing the intention to return to the position; (iii) the Employee must state the anticipated date of return to work.

During maternity leave, PTO is not earned or accumulated. Health coverage will continue during this eight-week leave time. Employees who wish to use unused PTO during all or part of the leave, may do so, and should submit the request in writing prior to taking the leave.

Small Necessities Leave Act: An Employee will be eligible to seek a Small Necessities Leave if the Employee has worked for MH for at least 12 months and has worked at least 1,250 hours during the 12 months before the leave. Small Necessities Leave may be taken

EMPLOYEE HANDBOOK
METRO HARVEST, INC.

by eligible Employees to (i) participate in school activities of a son/daughter; or (ii) accompany a son/daughter or elderly relative to a routine medical appointment.

Eligible Employees are entitled to a maximum of 24 hours of leave during any 12-month period. Written notice should be given to the Employees' manager at least seven days prior to the leave.

Jury Duty: For time served on jury duty, MH will pay Employees the difference between their salary and any amount paid by the government, unless prohibited by law, up to a maximum of three days. If an Employee is required to serve more than three days of jury duty, MH will provide the Employee with unpaid leave or the Employee may use accrued PTO. Upon request, Employees must provide MH a copy of proof of service from the court in which they appeared.

Voting: We encourage Employees to exercise their voting rights in all municipal, state and federal elections. Under most circumstances, it is possible for Employees to vote either before or after work. If it is necessary for Employees to arrive late or leave work early to vote in any election, Employees should arrange with their supervisor/manager no later than the day prior to Election Day.

Domestic Abuse Leave: Employees subject to domestic abuse may be eligible for a leave of absence. Please see Human Resources for more information.

Family Medical Leave Act (FMLA)

Eligibility: All regular, non-introductory period Employees scheduled to work a minimum of 30 hours per week.

MH provides family leaves of absence without pay to eligible Employees who wish to take time off from work duties to fulfill family obligations relating directly to childbirth, adoption, or placement of a foster child; or to care for a child, spouse, or parent with a serious health condition. A serious health condition means an illness, injury, impairment, or physical or mental condition that involves inpatient care in a hospital, hospice, or residential medical care facility; or continuing treatment by a healthcare provider.

Employees in the following employment classifications are eligible to request family leave as described in this policy:

- All Employees who have worked for MH for at least 12 months and at least 1,250 hours in the 12 months prior to the leave request.

Eligible Employees should make requests for family leave to their manager at least 30 days in advance of foreseeable events and as soon as possible for unforeseeable events.

Sick Leave

All MH Employees are entitled to receive paid sick leave each year. Employees will earn 1 hour of sick time for every 30 hours worked – up to 40 hours per year. Employees start accumulating paid sick leave on their date of hire, yet will not be eligible to use accumulated sick leave until they have completed the 90-day introductory period. Employees may use sick leave in increments of 1 hour or more.

Unlike PTO, Employees will not be compensated for accumulated sick leave upon the time of termination with MH.

Workers' Compensation

MH Employees are covered by the Massachusetts Workers' Compensation Act that provides financial compensation and the payment of certain medical expenses to workers for certain injuries sustained or illnesses arising from their employment. In the event an Employee is injured, they may be eligible to receive weekly workers' compensation wage-replacement benefits. MH bears the full cost of this program.

Employees must immediately report all injuries or illnesses, regardless of severity to their manager. MH management will work with the injured Employee to complete the injury report no later than 72 hours after the injury occurs.

Employees may not use group health plans for injuries or illnesses covered under the Workers' Compensation Act. Further, Employees may not use accrued leave while they are receiving wage-replacement benefits under workers' compensation.

MH works closely with its workers' compensation insurer to investigate any suspected fraudulent workers' compensation claims.

SECTION V – RESIGNATION AND TERMINATION

Resignation and Termination Policies

MH asks that Employees who resign give at least two weeks' notice of intention to leave their job, and submit written notice stating reasons for resigning and the effective date. MH reserves the right to immediately dismiss an Employee who resigns, however, the Employee will be paid during the two-week notice period. An exit interview will be scheduled on or near the final day of employment.

Health insurance plans continue through the end of the month in which the Employee works their last day, provided they have paid contributions for that month. Under federal law, resigning Employees are entitled to participate in MH's group health plan at their own expense for at least 18 months (see COBRA).

EMPLOYEE HANDBOOK
METRO HARVEST, INC.

MH will issue a final paycheck, including payment for any unused PTO, on the next regular payday after resignation. MH will notify the CCC no more than 1 business day after the Employee's employment concludes.

Immediate termination of employment will occur if an Employee is found to have diverted marijuana (law enforcement and CCC will be notified); or engaged in unsafe practices with regard to MH's standard operating procedures (CCC will be notified). Employees who are terminated will receive a final paycheck, which includes any accrued PTO, at the time of termination.

Exit Interview

Employees who resign from MH are asked to complete an exit interview with their manager or a member of the executive management team. The purpose of the exit interview is to give the Employee the opportunity to explain what they liked and disliked about working at MH and to gather suggestions for how MH can improve policies and practices.

Exit interviews are designed and intended to be constructive for both MH and the Employee. As a result, MH does not share information or discriminate against Employees who voluntarily share their opinions during exit interviews.

EMPLOYEE HANDBOOK
METRO HARVEST, INC.

EMPLOYEE ACKNOWLEDGEMENT FORM

This Employee Handbook describes important information about MH, and I understand that I should consult with Human Resources or my direct Manager regarding any questions not answered in the handbook. The policies described in this manual are not conditions of employment and the language is not intended to create a contract between you and MH. I have entered into my employment relationship with MH voluntarily and acknowledge that I am an employee at will and there is no specified duration of employment. Accordingly, either MH or I can terminate the relationship at will, with or without cause, at any time, so long as there is no violation of applicable federal or state law.

Since the information, policies, and benefits described here are necessarily subject to change, I acknowledge that revisions to the handbook may occur, except MH policy of employment-at-will. It is MH's intent to communicate changes to this handbook through official notices, and I understand that revised information may supersede, modify, or eliminate existing policies.

Furthermore, I acknowledge that this handbook is neither a contract of employment nor a legal document. I have received the handbook, and I understand that it is my responsibility to read and comply with the policies contained in this handbook and any revisions made to it.

EMPLOYEE'S NAME (printed):

EMPLOYEE'S SIGNATURE:

DATE: _____

**Metro Harvest
Security Policies & Procedures**

Section I — Introduction	1
Section II — Building Security	2
Section III — Agent Security	6
Section IV — Emergency Response Procedures	8
Section V — Inventory Management & Anti-Diversion	11
Section VI — Cash Management	16
Section VIII — Agent Background Checks & Training	17
Section IX — Reports & Recordkeeping	18
Section X — Emergency Contact List	19
Section XI — Job Descriptions	19

SECTION I — INTRODUCTION

Overview

Metro Harvest (MH) along with Northeast Alternatives (NEA) who is responsible for developing, implementing and overseeing the security protocols and staff for MH has prepared and developed security policies and procedures to provide for the safe, orderly, and legal sales of Marijuana. The following policies and procedures are necessary to ensure the safety and security of our retail facilities

Security Program Management Roles and Requirements

- Under the supervision of the Chief Executive Officer, MH's Director of Security is responsible for the development and overall management of the Security Policies and Procedures for MH.
- The Director of Security is responsible for implementing and administering the Security Policies and Procedures as prescribed as well as any approved changes.
- Managers are responsible for ensuring security measures within each division of MH.
- Access to marijuana and marijuana products will be limited to MH agents who have a need and who are also capable of safeguarding such products. Unauthorized agents and visitors will not have access to marijuana or marijuana products.
- MH agents with approved access to marijuana and marijuana products are responsible for the product when in their control. Agents will also be responsible for safeguarding any marijuana and marijuana products that come into their possession while performing assigned duties.
- Agents will promptly report any safety or security concerns regarding agents or visitors to the Director of Security. This includes any information that reflects adversely upon the integrity or general character of an agent; information which indicates that the agent's ability to safeguard marijuana, marijuana product, confidential patient information, any other information which may jeopardize MHA in any way may be impaired; and any information that may adversely affect the security and safety of the premises.
- Provide security administration and management for MH.
- Ensure MH agents undergo required background screening prior to being granted access to the premises and/or offered employment, including but not limited to screening of financial history, criminal history, previous employment, and known affiliations, among others.
- Ensure secure storage and work spaces are properly monitored and safeguarded.
- Ensure compliance and adherence to the provisions outlined in the Massachusetts Department of Public Health Security, "Security Requirements for Registered Marijuana Dispensaries," 105 CMR 725.110.
- Serve as the primary point of contact for law enforcement for all security-related matters.
- Establish and maintain a secure visitor management program, including a visitor log.

- Provide initial security training program for new agents as well as annual training for all MH agents.
- Establish and maintain safe and secure policies and procedures for transportation.
- Update the Security Policies and Procedures as needed, but at minimum on an annual basis.

SECTION II —BUILDING SECURITY

Customer Access

- All customers must be 21 years or older and must present one of the following forms of identification containing a photograph and date of birth: driver's license, government-issued ID card, military identification card, or a passport in order to gain access to the facility. Identification will be scanned by a handheld IDVisor smart ID scanner which detects the legitimacy of the identification and provides a read out of the identification including age, address and name of the customer. The identification scan will take place at the security checkpoint by a member of the security staff at the security check point before being allowed access into the facility.

Authorized Visitor Access

- Authorized visitors (i.e. outside vendors, contractors and visitors pursuant to 105 CMR 500.000 will be issued a Visitor Badge and be escorted by an authorized MH agent at all times.
- Agents will be notified when an authorized visitor is entering a Limited Access Area.
- Authorized visitors are prohibited from remaining on the premises once the purpose of their visit has been completed.

Visitor Access Procedures

- Photograph identification, such as a valid driver's license, will be required for all authorized visitors.
- Visitor Record: A visitor sign-in and sign out record will be required. This record will include the visitor's name, address, organization or firm, date, time in and out, and the name of the authorized agent who will be escorting the visitor. This information is kept securely on site and available for review by the CCC regulatory investigators or local officials.

Perimeter Controls, Monitoring, and Controlled Access

- Individuals who are not engaged in an activity expressly permitted under 105 CMR 725.000 are prohibited from the premises of MH.
- Proper lighting will be used and maintained at all times, including after normal business hours, in and around MH facilities. The lighting will include areas around the premises including entry and exit points, parking areas, and the perimeter fence lines.

- Foliage on the premises will be maintained in a manner that does not allow persons to conceal themselves from sight.
- All entry points and perimeter windows will be alarmed.
- The perimeter will be monitored 24-hours a day by a remote monitoring center and security agent(s).

Building Access Controls

Access will be controlled by card proximity readers and monitored using cameras, a buzzer system. In addition the entry area will be monitored by the security staff, which allows security agents to view individuals as they approach the main entrance to the facility.

Security Checks and Inspections

The Director of Security or a designated alternate will conduct regularly scheduled security checks of the MH facility and of the premises. As an added precaution, areas within MH facilities will be routinely checked throughout the day and at the beginning and close of each operational period to ensure that all products have been properly secured in the identified secured storage or vault areas, if there is found to be any unsecured products remaining the security agents will contact the retail Manager as well as the Director of Security, and document the incident in a report to be approved by the Director of Security.

Prohibited Items and Weapons

Items that constitute a threat to agents, visitors, and the MH facility are expressly prohibited on the premises, regardless of whether the individual or agent holds a valid permit to carry a weapon. This includes, but is not limited to, items such as firearms; knives; pepper sprays; chemicals; explosives; clubs; box cutters; and any items deemed unlawful by law enforcement.

Intrusion Detection Systems (IDS)

The custom IDS includes intrusion detection, camera monitoring, fire alarms, motion sensors, and biometric lock technology, among other features.

- Central Monitoring Station:
 - The IDS has multiple redundancies in place to ensure connectivity with the central monitoring station including, but not limited to, a secure connection using digital, wireless, and radio-controlled frequencies.
 - When the central monitoring station detects an intrusion, malfunction or tampering security agents, law enforcement, and management will be notified within five (5) minutes after the failure, either by text message, email or telephone. If needed, repairs to the IDS system will be made immediately or within a maximum 24-hour period.
- IDS Operations
 - The IDS will have all external zones activated 24-hours a day, and internal zones will be armed on a regularly scheduled time period. A daily record will be maintained at MH identifying the person responsible for setting and deactivating the IDS. In most cases the system will self-arm on a regularly scheduled basis and all exterior points of access will be armed at all times.

- A failure to activate or deactivate will be reported to the Director of Security and a record will be maintained for at least ninety (90) days.
- Records will also be maintained for ninety (90) days indicating time of receipt of alarm, name of security staff responding, time of dispatch to MH, response time security staff arrived at the alarm location, nature of alarm, and relevant response actions.
- Security/Surveillance Rooms
 - All security system equipment and recordings will be maintained in a secure location on-site that will remain locked in order to prevent theft, loss, destruction, and alterations.
 - Rooms designated for security equipment or records storage will not be used for any other function, and access to the designated rooms will be limited to those agents that are essential to surveillance operations, law enforcement authorities, authorized security system service personnel, and the CCC.
 - A current list of authorized agents and service personnel that have access to designated security rooms will be made available to the CCC upon request.
- Power Outage
 - MH has separate power source that will provide electricity to all security systems in the event of a power outage. This power source will remain independent from the main power source.
 - MH will immediately notify appropriate law enforcement authorities and the CCC within twenty-four (24) hours in the event of a failure of any security alarm system due to a loss or electrical power or mechanical malfunction that is expected to last longer than eight (8) hours.

Video Surveillance

- As required by 105 CMR 500.000, video recordings will allow for the exporting of still images in an industry standard image format, including .jpg, .bmp, and .gif. Exported video will have the ability to be archived in a proprietary format that ensures authentication of the video and guarantees that no alteration of the recorded image has taken place. Exported video will also have the ability to be saved in an industry standard file format that can be played on a standard computer operating system. All recordings will be erased or destroyed prior to disposal.
- Video surveillance cameras are located in all areas that may contain marijuana or marijuana products including all points of entry and exit to MH, the perimeter of the building, and in all parking lot areas. In addition, the following requirements will be met:
 - Cameras will be directed at all areas where marijuana is processed prepared, stored, handled, and dispensed.
 - Camera placement is capable of clearly capturing any person entering/ exiting Mh facilities.
 - All video recordings contain a date/time stamp.
 - Cameras will be angled to capture a clear and certain identification any person entering/exiting MH or restricted area and lighting conditions will be appropriate for the area under surveillance.

- Video cameras will be capable of producing clear, color, high-resolution photo (live or recorded), and images will include date/time frame recording that does not obscure the photo. Twenty-four hour recordings from all video cameras will be available for immediate viewing by the CCC upon request. These recordings will be retained for a minimum of ninety (90) days, will not be destroyed or altered, and will be retained as long as necessary if MH is aware of a pending criminal, civil or administrative investigation for which the recording may contain relevant information.
- All security equipment (cameras, alarms, etc.) will be kept in working order and subject to inspection and testing at intervals not to exceed thirty (30) calendar days from the previous inspection

Redundant Notification Systems

A third party security vendor will provide a redundant notification MH's security systems. This vendor will not be responsible to or be affiliated with the primary security vendor.

Internal Alarms

For the safety of all agents, authorized visitors and registered patients/caregivers, panic/duress alarms will be located throughout MH and connected to local law enforcement authorities.

Secure Storage Areas & Vaults

- Storage areas and vaults will have clearly posted Limited Access Area signs and be monitored by additional security measures, including surveillance in the room, and motion detection all of which are part of the IDS. The minimum number of authorized agents essential for efficient operation will be granted access to storage areas and vaults. A list of authorized agents will be kept and maintained by the Director of Security and updated as needed.
- Upon entry into a storage area or vault room, agents will complete a "Security Container Check Sheet" to ensure proper records of openings, closings, deposits, and withdrawals of any inventory are maintained.
- Storage areas and vaults can only be accessed by the CEO, COO, CPO and Retail manager, access the secured storage or the Vault is by Biometric fingerprint and digital pin code.
- Cash and medicinal inventory will be stored separately at all times and never commingled in the same container or vault.

Access Control to Limited Access Areas

- Limited Access Areas will be clearly identified with a posted sign that will be a minimum of 12" x 12" and states "DO NOT ENTER – LIMITED ACCESS AREA – ACCESS LIMITED TO AUTHORIZED PERSONNEL ONLY"
- The minimum number of authorized agents essential for efficient operation will have access to inventory, cash, and management offices. Access will be restricted using zoned proximity reader key cards and by maintaining internal automatic locking doors.

- MH agents will visibly display their MH ID badge while performing job duties on-site or off-site.
- Agents may not bring bags, camera phones, backpacks or purses from the break room into the areas where visitors are present. Agents will use individual lockers for storing personal belongings during scheduled work hours. Any item that could be used for diversion may be prohibited at the discretion of the Director of Security.

Security System Audit

In addition to the monthly security system inspection, MH will perform a security system audit using an external vendor on an annual basis. The audit report will be submitted to the CCC no later than thirty (30) calendar days after the audit is conducted. In the event that the audit identifies areas for improvement related to security system, MHG will also submit a plan to mitigate those concerns within ten (10) business days.

SECTION III —AGENT SECURITY

Identification Badging

- A permanent badge with photo identification will be issued to each agent on their first day of employment with MH – this ID badge is in addition to the CCC agent registration card issued by the CCC.
- MH agents will visibly display their CCC Agent badge at all times while performing their assigned job duties, whether on or off-site.
- Badges will be promptly recovered or, when appropriate, re-issued whenever an agent's requirement for entry to MH no longer exists, including immediate card deactivation, due to an internal transfer, termination of employment, or for any other appropriate reasons.

Badge Preparation

- Prior to badge preparation for a new agent, the Director of Security will ensure that all required background checks have been completed and documented and that the agent is granted the appropriate level of access for the job the agent will be performing.
- A color photograph will be taken and the agent's last name and assigned agent number will appear on the badge.
- The badge will include a number, date of issue, and agent's name, and this information will be recorded in the badge log maintained as part of MH's recordkeeping requirements.
- Badges must be worn on the outer garment, above the waist. Neck lanyards are acceptable to display badges.

Badge Control/Accountability

- All permanent badge "blanks" will be individually numbered with a sequential number on the front.

- Permanent badges are recorded in a master log, using the preprinted sequential number on the front, date of issue and printed name and maintained as part of MH's recordkeeping requirements.
- Visitor badges are maintained by the Director of Security or a designated alternate.
- All visitor badges are individually numbered and are issued to specific individuals.
- The type of badge issued is determined by the purpose of the visit and verified authorized access level.
- Upon issue, the badge number is recorded in the visitor log.
- Upon departure, badges will be returned and the departure time is recorded on the visitor log. Badges will be checked to ensure the individual has returned the same badge issued.
- The visitor log will be maintained as part of MH's recordkeeping requirements.

Biometric fingerprint/Pin code Access

- In addition to the identification badges worn by all agents, Biometric fingerprint and or pin code access will be issued to those agents who have clearance to Limited Access Areas to complete job functions.
- Biometric fingerprinting will be issued and accounted for in MH's Biometric software database and be maintained in accordance with MH's recordkeeping requirements.
- Each Fingerprint will grant access to specific zoned areas for authorized access; access may be limited as necessary.

--- SECTION IV — EMERGENCY RESPONSE PROCEDURES

Investigative Response to Alarms

- MH will have security agents on-site during operating hours.
- If IDS, video surveillance, or other means indicate the presence of a potential intruder, security agents will immediately contact the The City of New Bedford's Police Department by dialing 911.
- The maximum acceptable response time for any alarm will be five (5) minutes for MH security agents.
- Security agents should, at a minimum, provide the following to the 911 operator:
 - Number of suspected intruders;
 - Physical description of the suspected intruders; and
 - Location within the facility of the suspected intruders.

Hostile Intruder

- Immediate response: Dial 911 or activate one of the panic/duress alarms located throughout the Facility and connected to local law enforcement authorities;
- Alert all occupants within the Facility to find a safe location;

- If deemed life threatening, do not engage or confront the intruder - await response from law enforcement;
- If safe to do so, evacuate the surrounding area immediately;
- Close and secure all doors;
- If unable to safely exit the building, seek shelter in a room where doors can be locked or barricaded securely;
- Turn off lights in room;
- Remain out of sight of doors and windows;
- Remain quiet and turn off the volume on cell phones;
- Once safely in a secure room, security agents or any other individual will contact The City of New Bedford's Police by dialing 911 and give the location and number of people in the room;
- Follow all instructions provided by the 911 operator;
- If unable to speak, leave phone line open to allow the 911 operator to hear what is occurring in the room;
- If responding law enforcement officials are encountered, keep hands elevated and palms visible;
- If the fire alarm sounds, remain in place unless fire or smoke is detected or advised to do so by the 911 operator;
- Do not carry items in hands that could be mistaken as a weapon;
- When possible, security agents will assist those with disabilities and those with any injuries by escorting them to the MHrest safe exit or safe area;
- If able to safely exit the Facility, do not return until it is declared safe to do so by law enforcement and fire officials; and
- Follow all instructions issued by law enforcement and fire officials.

Criminal Trespass / Indication of Security Compromise (Non-Hostile)

- In the event an agent detects that criminal trespass has occurred, the agent should report this information to the Security Office immediately.
- Security agents will remain at the location of suspected compromise when possible.
- Immediately notify the Director of Security for a determination of actions to be taken.
- Two (2) or more agents will secure the compromised area, and conduct an inventory of the contents and check for tampering or missing inventory.
- If necessary, the Director of Security will request assistance as required from [The City of Fall River] Police Department and notify the DPH if required (See Section 9 Emergency Contact List).
- If immediate evacuation is necessary due to an emergency situation, storage containers and controlled areas will be examined upon return to determine whether marijuana, marijuana products or cash were left unattended or if any marijuana, marijuana products

or cash are missing following an inventory check. The Director of Security will prepare an Incident Report that will be submitted to the Chief Executive Officer.

- Any emergency or event that would inhibit or prevent the proper safeguarding of inventory will be reported immediately to the Director of Security.

Evacuation

- In the event of a fire or other emergency in which the MH facility must be evacuated, security agents will be responsible for coordinating and directing an orderly evacuation of each assigned section of the facility. Drills for evacuation and lockdown should be coordinated with the The City of New Bedford's Police and Fire Departments - evacuation priorities are:
 - Move occupants who are closest to the danger to a safe area MHR or at an emergency exit;
 - Direct all occupants to evacuate the building through the MHrest safe emergency exit;
 - After safely exiting the building, all patients, visitors and agents should proceed directly to the predetermined assembly area to participate in "roll call" led security agents.
 - In the event MH receives a bomb threat, the recipient agent should notify his/her manager immediately, and dial 911.
 - In the event of a bomb threat and/or explosion, all occupants should be evacuated as described above.

Fire

- In the event of a fire, the agent discovering the fire will immediately dial 911 and activate the internal fire alarm.
- If safe to do so at the agent's discretion, the agent may extinguish the fire.
- If possible, agents leaving the affected area should attempt to turn off electrical equipment and close doors to prevent the spread of smoke or fire.
- All occupants will exit the building using the MHrest safe exit.
- Occupants will assemble for a "roll call" in the designated evacuation area, ensuring that they remain clear of responding fire apparatus.
- Smoke and fire alarms to be tested on a monthly basis.
- Fire extinguishers and the fire suppression system to be tested/inspected on an annual basis.
- The Director of Security will perform and document an annual Fire Evacuation Drill in consultation with the The City of New Bedfords Fire Department.
- Fire Evacuation Maps will be clearly posted around the MH facility and agents should review the maps on an ongoing basis.

Hazardous Weather / Shelter-in-Place

- Evacuees will follow the public official's instructions on the Emergency Alert System station.
- In the event that hazardous weather or other natural or manmade circumstances require a shelter-in-place order, the following items will be performed by security agents to implement the sheltering plan:
 - Announce to agents that a shelter-in-place has been advised and that the sheltering plan will be implemented.
 - If safe to do so, allow agents to depart prior to putting shelter procedures into place.
 - Take "roll call" and record number of agents who will be sheltering in the facility.
 - Secure and lock all doors and windows.
 - Move agents to a designated sheltering room in center of the facility.
 - Continuing monitoring of Emergency Alert System, radio, TV, and other methods of communication to determine when an "All Clear" is issued and the shelter-in-place can be lifted.

Incident Reporting:

- Reportable Incidents: MH will immediately notify the The City of New Bedford's Police Department and the CCC within twenty-four (24) hours after discovering the following:
 - Discrepancies identified during inventory, diversion, theft, loss, and any criminal action involving CCC or an CCC agent;
 - Any suspicious act involving the sale, cultivation, distribution, processing, or production of marijuana by any person;
 - Unauthorized destruction of marijuana;
 - Any loss or unauthorized alteration of records related to inventory; and
 - Any other breach that jeopardizes inventory.
- Documenting and Reporting: Within ten (10) calendar days, MH will provide written notice to the CCC of any incident described above, by submitting an incident report, detailing the incident, the investigation, the findings, resolution (if any), confirmation that the City of New Bedford Police Department was notified, and any other relevant information. Reports, and supporting documents, including photos and surveillance video related to a reportable incident will be maintained by MH for a minimum of two (2) years and made available to the CCC and to law enforcement authorities acting within their lawful jurisdiction upon request.

SECTION V — INVENTORY MANAGEMENT & ANTI-DIVERSION

Required Markings

Marijuana and marijuana products will be packaged and labeled pursuant to MH's labeling policies (detailed in the Inventory Policies and Procedures). Storage containers will clearly indicate the contents, the amount in the container, the portions that contain marijuana products, and a bar code for assignment and tracking.

Inventory Tracking

MH's Retail Manager will provide oversight of the inventory control system, supervising agents to ensure that all daily tasks are completed accurately, conducting inventory counts, physically moving inventory and cash, and tracking and recording movements. MH will also implement a secure chain-of-custody system, whereby any time marijuana is transferred from one agent to another, the medicine will be weighed, and each party to the transfer will sign off on the weight. Strict documentation that details each transfer point of medicine from ordering and receiving to sale or disposal will be kept within LeafLogix.

Inventory reports will be generated in the Leaflogix system showing current inventory levels. Each product will have a unique transaction history that shows every sale and addition/removal from inventory, as well as a date/time stamp and the user ID of the registered dispensing organization agent who executed the transaction. Customizable entries designate reasons for inventory adjustments. Only designated MH agents, such as the Dispensary Manager, Chief Executive Officer, Chief Operating Officer and Director of Security are able to view inventory reports. Sales and inventory reports will be generated and customized based on a wide variety of data fields. All purchase transactions will be tied to individual patient records.

Leaflogix provides complete chain of custody tracking for inventory, from seed to sale, allowing management to see which agents have handled product in every step of the process. The Chief Operating Officer will use Leaflogix to conduct and document an audit of the daily inventory according to GAAP once every thirty (30) calendar days. If the audit identifies a reduction in the amount of marijuana or marijuana products in our inventory not due to documented causes, an investigation led by the Chief Executive Officer will determine where the loss occurred and immediately take and document corrective action; inform the CCC within ten (10) business days by submitting a written report which details the circumstances of the event, any corrective actions taken, and confirmation that the appropriate law enforcement authorities were immediately notified.

If the audit identifies an increase in the amount of inventory not due to documented causes, an investigation led by the Chief Executive Officer will determine where the increase occurred and take and document corrective action.

Storage

- Final products will be stored in a designated vault room, a highly secure interior room within a Limited Access Area of the MH facility.
- No marijuana products or byproducts will be left unsecured or unattended at any time.
- Only the Chief Financial Officer, Chief Operations Officer or the Retail Manager or designated agents must be present to access the final product storage vault. At no time can an agent access the vault alone.
- Records of the date/time and the agents present when the final product storage vault is opened will be and maintained via sign in logs at the final storage vault.

- At no time will the door of any room containing the final product storage vault be left open while the room is unattended. If the room is in use, then the outer door will be kept closed.
- The vault will only be open during the time required to remove/replace marijuana and marijuana products.
- The Vault will have a separate cash Safe to insure that finished product stays separated from cash storage
- A record of the names of persons having access to the vault rooms will be maintained by Director of Security.
- Security containers, final product storage vaults, cabinets, and other authorized storage containers will be kept locked when not under the direct supervision of an authorized agent entrusted with the contents.
- Access to vault room is highly restricted and is safeguarded via the use of Biometric fingerprint and pin code.

Inventory Control System

- The Leaflogix and METC Point of Sale (POS)/Inventory System will be used to track all seeds, plants, and products and utilized to verify all product identification and weight measurements. In addition, records of sales transactions will be recorded by Leaflogix.

Inventory Control Procedures

At the conclusion of each operational period the following will be performed:

- Ensure that all marijuana products are properly stored in the final product vault.
- Ensure that all work tables and surfaces are clear of marijuana product.
- Ensure that all marijuana product has been removed from processing equipment and is properly stored.

On a weekly basis, designated agents will conduct a facility-wide inventory count of inventory. In the event of a discrepancy between total weight of harvested marijuana and total marijuana dispensed, stored and/or accounted for as product waste, the Director of Security, Chief Executive Officer and Chief Operating Officer will be notified, and an immediate internal audit will be conducted to determine the reason for the discrepancy. If it is determined that there is an error or inaccuracy in its inventory, then the cause will be investigated and corrective action measures will immediately be put into place to avoid such error or inaccuracy in the future.

Waste & Destruction

All waste, including waste composed of or containing finished marijuana and MIPs, will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations. Waste will be discarded into one of two (2) designated trash rooms at MH– the Plant Trash Room for plant material, extraction and refinement waste or the Non-Plant/General Trash in the receiving Room.

- Plant Waste: Plant material, including extraction and refinement waste, will not be left in trash rooms for more than ten (10) days in order to prevent the spread of insect and

disease problems to other locations in the Facility. Discarded plant material will be stored and secured in the dedicated Plant Trash Room at MH. Prior to being disposed of discarded plant material will be grinded and incorporated with solid waste, resulting in the mixture being rendered unusable. A minimum of two (2) MH agents will dispose of the plant material at the landfill. The agents will be present to witness and document disposal.

- Liquid Waste: Liquid waste containing marijuana or by-products of marijuana processing will be disposed of in compliance with requirements for discharge into surface water (314 CMR 3.00), groundwater (314 CMR 5.00), and sewers (314 CMR 7.00), or disposed of in an industrial wastewater holding tank in accordance with 314 CMR 18.00.
- Non-Plant Material Waste: All other non-plant material will be housed in General Trash Room and routinely disposed.
- Returned Product from a Qualifying Patient or Caregiver: MH will accept at no charge any unused, excess, or contaminated marijuana from a customer or personal caregiver, and will destroy it as provided in 105 CMR 500.000. As part of recordkeeping requirements, MH will maintain a written record of such disposal, which will include the name of the supplying registered qualifying patient or personal caregiver if applicable.
- Waste Disposal Recordkeeping: Waste, including marijuana, MIPs or any other form of waste containing plant material is disposed of, MH will maintain a written record of the date, the type and quantity disposed of, the manner and place of disposal, and the agents who witnessed the disposal, including their signatures. MH will keep disposal records for at least two (2) years.

Anti-Diversion

- MH agents should be aware of and observe for any unusual behavior in patients, caregivers, authorized visitors or other MH agents that may indicate the potential exists for diversion.
- Strict adherence to certification amounts. (per CCC guidelines above)
- Dispensing Procedures:
 - Customers must present a valid form of identification containing a photograph and date of birth – acceptable forms of ID include a driver's license, government-issued ID card, military identification card, or a passport.
 - Customers are allowed up to one ounce of marijuana or 5 grams of concentrates and or MIP's per visit as required in CMR 105 500.00
- In the event an agents observe suspicious behavior by a patient while at the dispensary, the Dispensary Manager or the Director of Security should be notified prior to the completion of a sales transaction - examples of such behavior include:
 - Customer appears to be under the influence of drugs or alcohol;
 - Customer requests additional medicine because he/she lost or forgot to pack medication; and
 - Customer makes threats or attempts to elicit guilt or sympathy.

Leaflogix point of sale (POS) software will track each transaction and a record of all sales transaction will be stored and be readily available. Any change made to the POS system must be reviewed and approved by the Chief Executive Officer, in advance of the change being made.

All cash will be secured in a safe and stored in a designated vault room, separate from marijuana or marijuana products. The safe will have a 4-digit combination lock with a slot in which to drop in the cash. The two-agent integrity rule is required to access the vault room. This rule requires the presence of two (2) authorized agents when the cash storage vault is opened. At no time can an agent access the vault alone. Records of the date/time and the agents present when the cash storage vault is opened will be and maintained via sign in logs at the cash storage vault. At no time will the door of the cash storage vault be left open while the room is unattended. If the room is in use, then the outer door will be kept closed. The vault will only be open during the time required to remove/replace cash. Until further agents are identified, the only agents authorized to access the safe will be the Chief Executive Officer, Chief Operations Officer, and Chief of Production and the retail manager.

A record of the names of persons having access to the vault room will be maintained by Director of Security. Access to vault room is highly restricted and is safeguarded via the use of Biometric fingerprint and pin code number. Cash will be counted at minimum two (2) times each day:

- Prior to opening;
- At the end a shift – each Member Service Agent is required to reconcile his/her cash drawer at the end of their scheduled shift; and
- After the last sales transaction of the day has occurred.

In the event of a discrepancy, the Director of Security, Chief Executive Officer and Chief Operating Officer will be notified, and an immediate internal audit will be conducted to determine where and when the discrepancy occurred. If it is determined that there is an error or inaccuracy in the reporting, then the cause will be investigated and corrective action measures will immediately be put into place to avoid such error or inaccuracy in the future.

Cash will be transported from MH to the bank of deposit by a third party vendor. Pickups will occur frequently, or as requested by the Chief Executive Officer, Director of Security, or Chief Operating Officer.

SECTION VIII — AGENT BACKGROUND CHECKS & TRAINING

Agent Background Checks

- In addition to completing the CCC agent registration process, all agents hired to work for MH will undergo a detailed background investigation prior to being granted access to MH or beginning work duties.
- Background checks will be performed to screen for the following, among others:
 - Past criminal convictions;
 - Past drug-related offenses;

- Concealed weapon permits;
- DEA controlled substance registrations;
- Professional licenses;
- Driver's license information;
- Docket search of state and federal criminal & civil actions;
- Credit check;
- Bankruptcies, liens & judgments; and
- Healthcare licenses & sanctions.
- Verification of references provided by the agent at the time of hire.
- As deemed necessary, individuals in key positions with unique and sensitive access (e.g. members of the executive management team) will undergo additional screening, which may include interviews with prior employers or colleagues.
- As a condition of their continued employment, agents are required to renew their agent registration cards and submit to other background screening as may be required by MH or the CCC.

Agent Training

Prior to being granted access to secure areas, including all areas containing marijuana products, agents will receive the following training prior to performing job functions:

- New hire orientation – overview of MH and employment policies and procedures as outlined in the Agent Handbook;
- General security procedures relevant to all MH agents;
- Detailed security procedures relevant to the agents' job function;
- Confidentiality – including patient confidentiality and confidentiality as related to MH's policies and procedures such as security;
- Recordkeeping requirements; and
- Customized training related to the agent's job function at the time of hire by the Manager or Supervisor the agent will report to.

SECTION IX — REPORTS & RECORDKEEPING

Security Recordkeeping

The Director of Security is responsible for maintaining all security related records and reports.

Agent Personnel Records

Personnel records will be kept in a secure location to maintain confidentiality and be only accessible to the agent's manager or members of the executive management team. Agent records will include, at minimum, the following security-related information:

- Results of initial background investigation, including CORI reports;
- Documentation that references were checked prior to agent being hired;

- Offer letter from MH to the new agent, including job title and supervision;
- Materials submitted to the DPH for agent registration purposes;
- Documentation of annual performance reviews;
- Dates of completion of all required initial and recurrent training; including a signed statement by the agent attending the training with the date/time/place the training was received, topics discussed, and the name/title of the presenter(s).
- Documentation of all security related events (including violations) and the results of any investigations and description of remedial actions, restrictions, or additional training required as a result of an incident.

SECTION X — EMERGENCY CONTACT LIST

Key Staff: In the event of an incident or an emergency the following contacts should be notified:

Chief Executive Officer: Steve LaBell	508-326-4896
Chief Operations Officer: Thomas Gosselin	508-294-8948
Director of Security: Jared Gosselin	774-930-4431
Compliance Counsel: Valerio Romano, Esq.	617-866-7135

External Agencies / Departments: In the event of an incident or an emergency the following contacts may be notified:

Massachusetts CCC:	617.701.8400
Massachusetts State Police:	508.820.2300 (Headquarters)
	508.923.4014 (Local Barracks)
NSTAR	617.424.2000
City of New Bedford Fire (Non-Emergency)	508-991-6124
City of New Bedford Dept. of Health	508-991-6199
City of New Bedford Police (Non-Emergency)	508-991-6300
City of New Bedford City Hall	508-979-1400

SECTION XI — JOB DESCRIPTIONS

Director of Security: Under the supervision of the Chief Executive Officer, the Director of Security is responsible for the development and overall management of the Security Policies and Procedures for MH, implementing, administering, and revising the policies as needed. In addition, the Director of Security will perform the following duties:

- Provide general training to MH agents during new hire orientation or re-current trainings throughout the year;

- Provide training specific for Security Agents prior to the Security Agent commencing job functions;
- Review and approve incident reports and other reports written by Security Agents prior to submitting to the executive management team – follow up with security agent if needed;
- Maintain lists of agents authorized to access designated areas of the MH facility, including cash and product storage vaults, surveillance and network equipment room, and other highly sensitive areas of the MH facility;
- Lead a working group comprised of the Chief Executive Officer, Chief Operating Officer, Director of Security, Chief Production Officer, and any other designated advisors to ensure the current policies and procedures are properly implemented, integrated, effective, and relevant to ensure the safety of MH agents and assets;
- Ensure that all required background checks have been completed and documented prior to an agent performing job functions; ensure agent is granted appropriate level of access to the facility necessary to complete his/her job functions;
- Maintain all security related records, incident reports and other reports written by security agents;
- Evaluate and determine the number of security agents assigned to each shift and proper shift change times; and
- Maintain frequent contact with the City of New Bedford Police and Fire Department.

Security Agent: Security Agents monitor the state-of-the-art security systems including alarms, video surveillance and motion detectors. Security Agents are responsible for ensuring that only authorized individuals are permitted access to the MH facility by verifying appropriate ID cards and other forms of identification. In addition, Security Agents perform the following duties and other duties upon request:

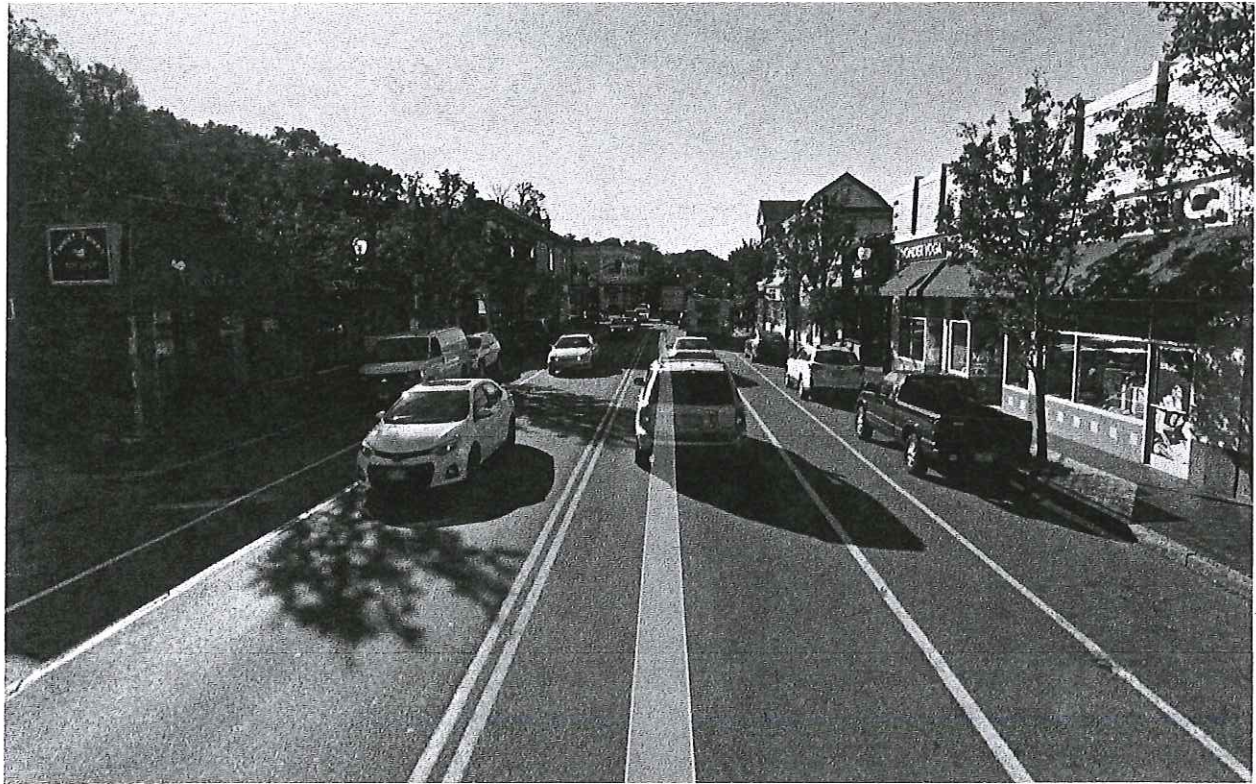
- Investigate, communicate and provide leadership in the event of an emergency such as an intrusion, fire, or other threat which jeopardizes registered patients, caregivers, authorized visitors, and MH agents;
- Respond and investigate security situations and alarm calls; clearly document the incident and details surrounding the incident in a written report for the Director of Security;
- Oversee the entrance to the Dispensary and verifying credentials of each person seeking access to the MH facility;
- Answer routine inquiries;
- Logging entries, and maintaining visitor log;
- Escorting authorized visitors in restricted access areas; and
- Escorting MH agents from the facility during non-business hours, and performing security checks at designated intervals.

Parking and Traffic Mitigation Plan

1308 Massachusetts Avenue is located in Arlington Heights which is a unique urban downtown retail district with ample street parking both on Massachusetts Ave, Park Ave, Davis St., and other side roads. Like most urban downtown locations there is no dedicated parking for individual stores. Instead there are wide streets with parking on both sides of the road to accommodate consumers that can enjoy the walkable downtown experience and bring general business to the area. This allows for multiple businesses to benefit from the shopping patterns of consumers. The general walkable rule in urban areas is around a quarter of a mile in any direction, bike and public transportation on Massachusetts Ave and Park Ave will reduce the amount of vehicle traffic.

Metro Harvest expects between 500 and 750 customers per day with higher volumes occurring on the weekends. The typical customer shopping pattern for cannabis consumers is fairly consistent with heavier volume at the 10am open, after the lunch hour, and from 5 to 7 pm. This is advantageous because during these times there is typically more available street parking as people are either at work or commuting. In urban settings we design the stores to allow any lines that might form to occur inside the building. This is accomplished in two ways; an internal vestibule with stanchions, and a stanchion line in the waiting area. The intent of this is to limit or eliminate any line from forming on the sidewalk.

The internal operations and efficiency of the store is important to mitigating parking or traffic issues. The interior design of the store was developed with the mind-set to move people quickly through the store while at the same time to ensure a great customer experience. To accomplish this, we have an express line and a total of 12 registers. Our process has evolved to the point where we can get the transaction time per customer down to under four minutes per transaction. This means the store is capable of moving three times the amount of traffic expected. People will be able to come and go so quickly that street parking will be nearly unaffected. In the unlikely event that traffic becomes an issue we have a QLess texting system that acts as a reservation system where we can control the number of people and when they come. We have used the QLess system effectively in another Massachusetts location and while we don't think this will be necessary in Arlington, we have it at our disposal.



Attachment 8

Metro Harvest ("MH") is committed to preventing and educating youth and families about the dangers of underage exposure to, and the consumption of, recreational marijuana.

This commitment will manifest itself in the following three efforts over time:

1. MH will conduct periodic literature reviews to identify recent research studies that offer conclusive evidence/findings that would be beneficial for public education. The findings from these literature reviews will be reviewed and analyzed to determine the most important and valid information that needs to be shared with the public. These findings may be substantial conclusive evidence of a health risk to a young person who engages in the use of marijuana. The findings may also offer prevention techniques that are now conclusively shown to be working in terms of preventing or limiting underage use of cannabis. The ultimate objective of this effort is to remain well-educated about the research results that are available in the public domain and to use this knowledge to enhance our next two efforts.

For example, MH has found the following literature review by the McDowell Group for the Matanuska-Susitna Borough's community substance use prevention coalition, THRIVE Mat-Su to be very well done and informative. You can find their Youth Marijuana Prevention Strategies document at this URL:

<http://www.mcdowellgroup.net/wp-content/uploads/2018/07/thrive-youth-marijuana-prevention-june-2018.pdf>

2. MH will offer a comprehensive Consumer Handbook to our customers. This Consumer Handbook will feature valuable information garnered from our literature reviews that we believe is important for our consumers (21+ years) to know as well as their families and underage children. Topics relevant to underage education and prevention will include:
 - a. What harmful health effects on youth are proven to be true by research findings?
 - b. What prevention methods are most effective based on research findings?
 - c. What should you as a legal consumer do to prevent underage exposure and consumption?

In addition, MH will make available in-store pamphlets/flyers and other useful educational materials that consumers can take home to read and share with their families. These materials will highlight the conclusive research findings related to the health risks of underage exposure and consumption as well as prevention methods adults should take to limit these risks.

3. MH will also offer an annual, complimentary educational session open to citizens who are interested in learning about the conclusive findings from the literature with respect to a variety of topics. Those topics related to this specific plan include the topics of underage exposure to, and consumption of, recreational marijuana. More specifically, this section of the session will address the health risks as well as the successful prevention techniques.

Attachment 9

Metro Harvest ("MH") is committed to informing customers about restrictions on public consumption and workplace use, the risk of second hand smoke, and the dangers of operating a motor vehicle while impaired.

Similar to our commitment to underage exposure to, and consumption of, recreational marijuana, MH's commitment to informing customers about these three items will manifest itself in the following three efforts over time:

1. MH will conduct periodic literature reviews to identify the MA laws on public consumption and operating a motor vehicle while impaired as well as those world-wide studies that offer conclusive evidence on the dangers of second-hand smoke. The findings from these literature reviews will be reviewed and analyzed to determine the most important and valid information that needs to be shared with the public. The ultimate objective of this effort is to remain well-educated about the research results that are available in the public domain and to use this knowledge to enhance our next two efforts.

For example, here is the current law in MA regarding public consumption of marijuana:

PUBLIC CONSUMPTION OF MARIHUANA OR TETRAHYDROCANNABINOL No person shall smoke, ingest, or otherwise use or consume marihuana or tetrahydrocannabinol (as defined in G.L. c. 94C, § 1, as amended) while in or upon any street, sidewalk, public way, footway, passageway, stairs, bridge, park, playground, beach, recreation area, boat landing, public building, schoolhouse, school grounds, cemetery, parking lot, or any area owned by or under the control of the town; or in or upon any bus or other passenger conveyance operated by a common carrier; or in any place accessible to the public. This by-law may be enforced through any lawful means in law or in equity including, but not limited to, enforcement by criminal indictment or complaint pursuant to G.L. c. 40, § 21, or by noncriminal disposition pursuant to G.L. c. 40, § 21D,* by the Board of Selectmen, the Town Administrator, or their duly authorized agents, or any police officer. The fine for violation of this by-law shall be three hundred dollars (\$300) for each offense. Any penalty imposed under this by-law shall be in addition to any civil penalty imposed under G.L. c. 94C, § 32L. *Note: Towns may choose one of three enforcement mechanisms: noncriminal disposition pursuant to G.L. c. 40, § 21D; by criminal indictment or complaint pursuant to G.L. c. 40, § 21; or both as set forth above.

2. MH will offer a comprehensive Consumer Handbook to our customers. This Consumer Handbook will feature valuable information garnered from our literature reviews that we believe is important for our consumers (21+ years) to know regarding restrictions on public consumption and workplace use, the risk of second-hand smoke, and the dangers of operating a motor vehicle while impaired.

In addition, MH will make available in-store pamphlets/flyers and other useful educational materials that consumers can take home to read. These materials will highlight the restrictions on public consumption and workplace use, the risk of second-hand smoke, and the dangers of operating a motor vehicle while impaired.

3. MH will also offer an annual, complimentary educational session open to citizens who are interested in learning about the conclusive findings from the literature with respect to a variety of topics. Those topics related to this specific plan include the topics of restrictions on public consumption and workplace use, the risk of second-hand smoke, and the dangers of operating a motor vehicle while impaired.

Attachment 10

Local Employment and Diversity

Metro Harvest is committed to hire from within the local communities we serve and to have a diversity policy that guides our hiring process. We are in a unique position as early entrants and leaders in a new industry that is creating tens and eventually hundreds of thousands of well-paying jobs across the country. We have developed a number of strategies to attract and hire talent from local communities including Indeed postings, local print publications and local job fairs and hiring days which we have found to be the most effective strategy.

The local job fairs and hiring days are a great way to meet many candidates from the local community in a condensed period of time. We advertise for a week in advance on local platforms including the Arlington Advocate, (Wicked Local) your local, Arlington Patch and local papers. Our recent hiring days have attracted hundreds of applicants with the majority coming from the local communities. We have five or six interviewers from our senior staff spend a timed eight minutes with each applicant which allows us to meet four-hundred and fifty applicants in a ten-hour day to staff the following positions:

- 1) 1 Store Manager
- 2) 4 Assistant Managers
- 3) 2 Inventory Managers
- 4) 1 Security Manager
- 5) 35 Budtenders
- 6) 5 Inventory specialists
- 7) 8 Security

The operation runs on a two-shift schedule starting two hours before opening and lasting until one hour after closing. Security at the facility is staffed twenty-four hours a day.

Metro Harvest also contributes to the local economy by using outside contractors and vendors to support the business. In the construction phase, Metro Harvest will seek local subcontractors and suppliers to perform the work and supply the building materials. This will include framers, roofers, finish carpenters, electricians, plumbers and HVAC contractors among others. During the operational phase of the business, Metro Harvest is supported by many outside vendors from the local business community, from catering to janitorial services.

Furthermore, Metro Harvest believes in creating and sustaining a robust policy of inclusivity and diversity. The company recognizes that diversity in the workforce is key to the integrity of a company's commitment to its community. It is dedicated to creating a diverse culture with a commitment to equal employment opportunity for all individuals. Its diversity plan is designed to promote equity among minorities, women, veterans, people with disabilities and people of all gender identities and sexual orientations. It will make every effort to employ and advance in employment qualified and diverse people at all levels within the company.

Metro Harvest's executives and leadership are committed to successful implementation of Metro Harvest's Diversity Plan. Its management team believes that increased diversity will provide the company with a richer perspective and approach to its business.

Metro Harvest's comprehensive diversity empowerment plan is a pillar of its purpose driven company. To better serve its customers, Metro Harvest aims to create an environment where personal identities, race, military service, sexual orientation, and heritage are utilized, celebrated, and valued. Its diversity initiatives and strategies are designed to attract, develop and advance the most talented individuals regardless of their race, sexual orientation, religion, age, gender, disability status or any other dimension of diversity.

Diversity Plan

Metro Harvest, Inc. ("MH") believes in creating and sustaining a robust policy of inclusivity and diversity. MH recognizes that diversity in the workforce is key to the integrity of a company's commitment to its community. MH is dedicated to creating a diverse culture with a commitment to equal employment opportunity for all individuals. MH's diversity plan is designed to promote equity among minorities, women, veterans, people with disabilities and people of all gender identities and sexual orientations. MH will make every effort to employ and advance in employment qualified and diverse people at all levels within the company.

MH's executives and leadership are committed to successful implementation of MH's Diversity Plan. MH's management team believes that increased diversity will provide MH with a richer perspective and approach to its business.

MH believes in creating and sustaining a robust policy of inclusivity and diversity, because MH recognizes that diversity in the workforce is key to the integrity of a company's commitment to the community where it is established. Coupled with that vision, MH also wants to ensure that its customers see themselves in the makeup of MH's employees.

MH's comprehensive diversity empowerment plan is a pillar of its purpose driven company. To better serve MH's customers, MH aims to create an environment where personal identities, race, military service, sexual orientation, and heritage are utilized, celebrated, and valued. MH's diversity initiatives and strategies are designed to attract, develop and advance the most talented individuals regardless of their race, sexual orientation, religion, age, gender, disability status or any other dimension of diversity.

Diversity Recruitment and Sourcing

MH will establish and maintain an inclusive and diverse workforce to serve its customers through innovative corporate recruitment of underrepresented and minority communities. MH has developed strategic corporate initiatives to ensure a diverse and qualified staff stands ready to serve its customers' needs. These strategic corporate initiatives include:

- Hosting career fairs in underrepresented in minority communities;
- Providing cultural training on cultural sensitivity and recognizing unconscious bias; and
- Using suppliers who are also committed to diversity and inclusion.

MH's recruitment efforts are designed to maintain a steady flow of qualified diverse applicants and include the following steps:

- Developing relationships with organizations serving minorities, women, people of all gender identities and sexual orientations, veterans, and persons with disabilities for employment referrals;

- Providing briefings to representatives from recruitment sources concerning current and future job openings;
- Encouraging employees from diverse groups to refer applicants for employment;
- Participating in career day programs and encouraging MH's diverse employees to participate whenever possible;
- Establishing recruitment efforts at higher learning institutions, and institutions with special programs that reach diverse people;
- Developing relationships with community child care, housing, transportation, and other programs designed to improve employment opportunities for diverse persons;
- Ensuring that job openings are sent to community partners; and
- Utilizing Zip Recruiter to reach over 100 online career and job websites, as well as social media.

Employee Retention, Training and Development

MH will offer promotions, career counseling and training to provide all employees with equal opportunity for growth and decrease turnover. MH will ensure that all employees are given equal opportunities for promotion by communicating opportunities, training programs, and clearly defined job descriptions. MH will ensure that all employees receive equal opportunity for career counseling, counsel employees on advancement opportunities and provide training programs to assist them in career development. MH will instruct managers and supervisors to refer employees seeking career counseling to Human Resources.

MH's diversity awareness training emphasizes MH's zero-tolerance commitment of harassment and discrimination and MH's strict adherence to take corrective action should any issues, concerns, or complaints arise. All MH employees are required to complete the diversity awareness training program during employee orientation. Training will begin immediately upon hiring, and all new employees will be required to participate in an orientation program that will introduce and stress the importance of the Plan.

Upon completion of the orientation program, new hires will be equipped to describe, discuss and implement the Plan. Following successful completion of the general orientation program, employees will undergo additional diversity training that will be tailored to the employee's specific job function. All employees will also be required to undergo ongoing diversity training to ensure knowledge of newly determined best practices and policies and continued familiarity and compliance with the Plan.

Awareness of the Plan goals and the Company's efforts to create an open culture with zero tolerance for discrimination, harassment, or retaliation, is crucial to MH's success. Management, staff, associates, vendors, contractors, and the general public all benefit from being informed of

the Diversity Plan objectives and procedures. Dissemination of information of the Diversity Plan includes the following:

- Inclusion of MH's Equal Employment Opportunity and Reasonable Accommodation statement in the Employee Handbook;
- Inclusion of MH's zero-tolerance policies for harassment, discrimination, bullying, and other actions which oppose MH's goal for a diverse workforce;
- Postings in suitable areas for employee communication;
- Diversity training programs for all employees;
- Annual progress evaluation meetings with appropriate personnel;
- Formal presentations made to management and employees on diversity initiatives.

Strategic Partnerships, Suppliers and Vendors

MH will partner with local organizations focused on inclusion and opportunity for minorities, women, veterans, groups concerned with persons with disabilities and people of all gender identities and sexual orientations.

MH will promote diversity and support the local economy through purchasing goods and services from vendors, contractors, and professional service providers that are owned and operated by individuals that have cultural and ethnically diverse characteristics. In selecting potential contractors, subcontractors, vendors and suppliers, MH will first to contract with small and diverse businesses. MH's goal is to maintain diverse organization vendor and contractor spending at or above 20% of total related expenses.

External communication efforts that align with MH's Diversity Plan will include:

- Advertising in employment and business sections of appropriate types of media;
- Participating in employment and business notification programs; and
- Distribution of literature to organizations actively supportive of minorities, women, disabled persons, the LGBT community and veterans.

Measuring Progress

MH has established a Diversity Committee (the "Committee") to assist the executive management team and the HR Manager with the implementation and growth of the Plan. The initial members of the Committee were selected based on their personal commitments to diversity. Initial Members of the Committee are Chris Harkins and Rich Rosier. Additional members of the Committee may be added at the discretion of MH's executive management team.

The Committee will be responsible for:

- Developing Equal Employment Opportunity (EEO) statements, policies, programs and internal and external communication procedures in support of the goals of the Plan.

- Assisting in the identification of EEO problematic areas including receiving, reviewing and resolving any complaints of discrimination or other non-compliance with regards to equal opportunity and fair treatment of all employees.
- Assisting management in arriving at effective solutions to problems regarding issues of diversity and inclusion.
- Designing and implementing internal reporting systems that measure the effectiveness of programs designed to support a company culture that fosters diversity.
- Keeping the company informed of equal opportunity progress through annual reports.
- Reviewing the Plan with management at all levels of the Company to ensure that the Plan is understood.
- Auditing MH's internal and external job posting to ensure information is in compliance with MH's diversity policies and procedures.

The HR Manager at MH will be responsible for auditing the Diversity Plan. The audit report setting forth the Company's performance in fulfilling the goals of the Plan will contain:

- Employment data, including information on minority, women, disabled, and veteran representation in the workforce in all job classifications; average salary ranges; recruitment and training information (all job categories); and retention and outreach efforts.
- A comprehensive description of all efforts made by MH to monitor and enforce the Diversity Plan.
- Other information deemed necessary or desirable by the CCC to ensure compliance with the rules and regulations governing Marijuana Establishments in Massachusetts.
- When available, a workforce utilization report including the following information for each job category at MH:
 - The total number of persons employed
 - The total number of men employed
 - The total number of women employed
 - The total number of veterans
 - The total number of service-disabled veterans
 - The total number of members of each racial minority employed

Community Character Integration

Arlington is a beautiful and unique place, rich in history with a culture of inclusion, family community involvement and pride. Metro Harvest takes very seriously that to be accepted into a community is a privilege. Our management team and employees understand the trust placed in us and work tirelessly to conduct the business professionally with deep respect for the community culture. We have similar values and believe that to be a member of the community we must give back both with our and our time and in giving back to further important city projects.

To properly support the unique character of the Arlington Heights neighborhood Metro Harvest with the help of GS Design Group designed the street front elevation to blend in with the character of neighborhood. The renovation of the property would be a complete gut job along with removing the existing mansard roof and storefront glass to be replaced with vertical shiplap and true divided transom windows under the soffit to compliment a small-town character. The four column features provide depth to the elevation, the substantial sconces add character and warm inviting light. The brick veneer, large crown molding and dental trim at the roof line give a nod to the Georgian Architecture present in surrounding buildings. When completed, the property will blend in perfectly to the village vernacular while adding some fresh new life.

The interior is designed to make customers feel at home with reclaimed barn wood features along with modern fixtures and touches. Arlington is a sophisticated yet understated place where people with means walk beside those less fortunate and treat each other as equals. Metro Harvest holds the same ideals. All walks of life will feel comfortable and welcome walking into the space. While security is important and present, it will not feel over-bearing. Metro Harvest believes that safe access to cannabis makes for a safer community. All types of people use cannabis for different purposes. We create an upscale retail experience that is comfortable, efficient, and safe for all adult consumers.

All orders on this quantity are backed and guaranteed by the **CO-OP** and its members. The **CO-OP** is a non-profit organization that is not for profit. It is a community of people who share a common interest in the environment and who are committed to the principles of the **CO-OP**. The **CO-OP** is a community of people who share a common interest in the environment and who are committed to the principles of the **CO-OP**. The **CO-OP** is a community of people who share a common interest in the environment and who are committed to the principles of the **CO-OP**.



GS Design Group Inc.
315 Quinet Ave.
P.O. Box 1200
Quincy, MA 02232
Tel 608.295.2032

[illegible]

BUILDING ELEVATIONS

Drawing Title	Drawn By	CT	Checked By	CG

A2.0

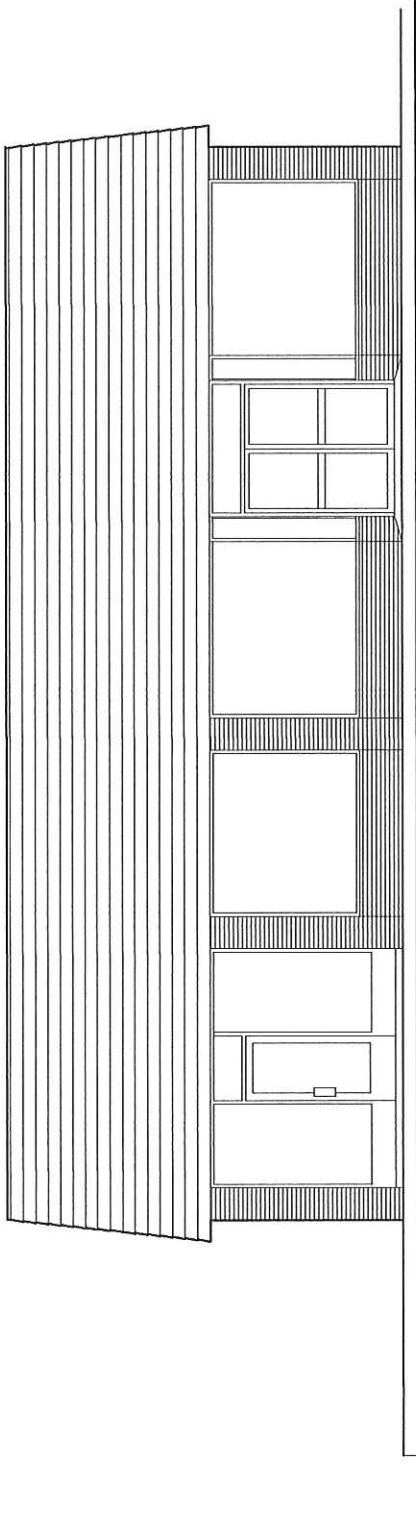
Ordering Number:	File Name:	Source: AS NOTED
------------------	------------	------------------

Date 5/11/19

Existing Elevation

Scale: 3/8" = 1'-0"

1



Proposed Elevation

Scale: $3/8" = 1'-0"$

2

