

Security Policies and Procedures¹

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¹ All information contained herein is subject to revision. Apothca intends to supplement and amend this document based upon input from the Cannabis Control Commission, the City of Fitchburg, City of Lynn, and as Apothca’s understanding of its needs change. Apothca will assure all necessary local authorities receive a copy of this document, as well as any finalized amendments to this document. We respectfully ask that the materials provided be held in confidence.

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General Security Requirements

Introduction

Apothca, Inc. (“Apothca”), a Marijuana Establishment in the Commonwealth of Massachusetts, has prepared and developed security policies and procedures to provide for the safe, orderly, and legal production and distribution of adult-use marijuana.

Security Program Management Roles and Requirements

- 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 Apothca.
- The Director of Security is responsible for implementing and administering the Security Policies and Procedures as prescribed as well as any approved changes.
- The Director of Security will continuously develop and update emergency policies and procedures for securing all product following any instance of diversion, theft, or loss of marijuana and will conduct an assessment to determine whether additional safeguards are necessary.
- The Director of Security will also develop sufficient additional safeguards as required by the Commission for any Apothca facility that presents special security concerns.
- Managers are responsible for ensuring security measures within each division of Apothca.
- Access to marijuana and marijuana products will be limited to Apothca 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.
- Apothca 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.
- Apothca agents will ensure that marijuana in excess of the quantity for normal, efficient operation is disposed of appropriately pursuant to 935 CMR 500.105(12).
- Agents will promptly report any safety or security concerns regarding agents, consumers, or visitors to the Director of Security. This includes any information that reflects adversely upon the integrity or general character of an agent; information that indicates the agent’s inability to safeguard marijuana, marijuana product, or any other information that may jeopardize Apothca’s operations in any way; and any information that may adversely affect the security and safety of the premises.
- The Director of Security will provide security administration and management for Apothca.
- Apothca will establish limited access areas accessible only to specifically authorized personnel, which shall include only the minimum number of employees essential for efficient operation.
- The Director of Security will ensure Apothca 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, and any other information required by the Cannabis Control Commission (“Commission”).

- The Director of Security will ensure secure storage and work spaces are properly monitored and safeguarded; Apothca will store all finished marijuana in a secure, locked safe or vault and in such a manner as to prevent diversion, theft, and loss.
- Apothca will keep all safes, vaults, and any other equipment used for the production, cultivation, harvesting, processing, or storage of marijuana and marijuana infused products (“MIPs”) securely locked and protected from entry, except for the actual time required to remove or replace marijuana.
- The Director of Security will ensure compliance and adherence to the Commission’s regulations, including—but not limited to—935 CMR 500.110.
- The Director of Security will serve as the primary point of contact for law enforcement for all security-related matters.
- The Director of Security, in coordination with Apothca agents, will establish and maintain a secure visitor management program, including a visitor log.
- The Director of Security will provide initial security training program for new agents as well as annual training for all agents.
- The Director of Security will establish and maintain safe and secure policies and procedures for transportation.
- The Director of Security, in collaboration with the Chief Operating Officer, will update the Security Policies and Procedures as needed; at a minimum the Security Policies and Procedures will be updated/reviewed on an annual basis.

Proximity Access Cards

- In addition to the identification badges worn by all agents, proximity card readers will secure all Limited Access Areas and will only be issued to those agents who require access to Limited Access Areas to complete job functions.
- Access Cards will be issued and accounted for in Apothca’s Access Card database and be maintained in accordance with Apothca’s recordkeeping requirements.
- Each access card will grant access to specific zoned areas for authorized access; access may be limited as necessary.

Investigative Response to Alarms

- Apothca will have security agents on site as-needed according to operational needs and requirements.
- If the Intrusion Detection System (“IDS”), video surveillance, or other means indicate the presence of a potential intruder, security agents will immediately contact law enforcement by dialing 911.
- Security agents will, 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.

Employee Security Policies

- Employees will ensure that Apothca facilities and limited access areas are only accessed by authorized personnel and individuals.

- Access to Apothca facilities is limited to employees and those persons allowed access by the state. All employees must be registered and licensed.
- All employees will be assigned access keys, cards, and personal security codes. These access controls are always to be protected and used only by the authorized employees.
- All employees must always wear their badge in a visible, above-the-waist location.
- Employees must determine an individual's reason for accessing the facility.
- Review federal or state photo ID and verify that the individual is over 21 years of age.
- Visitors shall sign-in and sign-out on a visitor log.
- The visitor log shall minimally include the name of the visitor and the date, time of arrival and departure, purpose of visit, the visitor identification badge number or other unique identifier, areas of the facility visited, and names of all employees visited.
- Each visitor shall receive a visitor badge for use while on site and return the badge prior to leaving the site.
- Visitors shall display their visitor badge and be escorted while on the premises.
- State or federal inspectors/employees may arrive for an inspection announced or unannounced and shall be granted access to any area of the facility, as requested.
- If an individual attempts to enter Limited Access or No Access areas, the individual shall be informed that only authorized personnel is allowed in that area. The individual shall be politely escorted to the sales floor, bathroom, waiting room, etc.
- An employee may not receive any type of consideration or compensation for allowing a visitor to enter a limited access area.
- Emergency visitors, e.g., emergency medical professionals or law enforcement, etc., will be signed-in per local procedures.
- Employees will be trained to use and understand security procedures and equipment as necessary in the event of an emergency.
- Panic buttons are placed throughout the facility. If safe to do so, these buttons must be used if intruders enter the facility, a robbery occurs, or if the safety of any employee or patron becomes threatened.
- All employees will be armed with duress codes if forced to deactivate the facility's security alarm.
- If at any time the access controls are lost or compromised, the employee must notify their supervisor immediately and assist with the recovery process as necessary.
- It is the responsibility of every employee to aid in the security of Apothca through prevention, awareness, reporting, and responsible incident management.
- Employees will properly store and secure all marijuana, marijuana products, and cash.
- Employees must never place product or cash in a location other than the designated areas within limited access areas.
- Employees are responsible for supervising all product and cash at all times throughout their shift.
- Any product being shown to a visitor or consumer must immediately be placed back in the product's designated area. No product may be left unsupervised at any time.
- Employees will be trained to identify suspicious behavior and to be observant of their surroundings.
- All employees are required to pay special attention to their surroundings upon opening and closing the facility.

- It is strict Apothca policy that all employees closing for the day leave the facility together and never alone.
- Employees are responsible for reporting any suspicious activities from visitors, consumers, or their colleagues to their supervisor immediately.

The following observations could lead to the detection of diversion:

- An individual purchases an unusually large amount of marijuana or marijuana products on a frequent basis.
- Large purchases are made in an unreasonably short time frame.
- An individual requests large purchases be packaged in smaller containers.
- In a confidential matter, employees must use their best judgment when observing consumer purchasing habits.

Handling of Marijuana

- Employees must encourage all individuals to maintain marijuana and marijuana products in their original packaging.
- Employees must encourage individuals to securely store marijuana and marijuana products in a manner that minimizes the risk of diversion.
- Employees will ensure that all marijuana, marijuana products, and cash are handled, stored, packaged, and recorded in accordance with Apothca policies and regulatory requirements.
- Employees must carefully package, restock, and weigh all product in a very precise manner to minimize loss.
- All weighing and counting of product must be performed in accordance with inventory procedures and requirements.
- Employees who discover that any product or cash has been mishandled, misplaced, or is missing must notify their supervisor immediately.
- All loss must be approved by the facility manager and recorded in the waste disposal log and ADP/POS system.
- All expired, contaminated, or unusable product must be properly recorded and stored. The facility manager must approve all marijuana waste and loss.
- The facility manager is responsible for approving all waste and inventory loss. Each occurrence will be reviewed and recorded in a data collection repository, which will be reviewed for trends and patterns.
- The facility manager will investigate and implement procedure variations to mitigate waste and inventory loss.
- Waste reporting occurs on a consistent basis during the shift of one or more employees.
- Inventory loss is detected in a consistent fashion during the shifts of one or more employees. All inventory losses, regardless of the reason, will be investigated by the dispensary manager.

In the event of a theft or robbery:

- Employees must not try to confront the assailant.
- Press the closest silent alarm, if it is safe to do so, and wait for law enforcement to arrive.
- Remain in place, do not move, and do not engage the assailant(s).

- As soon as it is safe to do so, Dispensary Management personnel will contact local law enforcement. State agencies will be notified as specified in local security procedures.

In the case of an individual who demonstrates verbal or physical aggression toward employees, visitors, or consumers:

- Try to calm the individual down by speaking to them in a respectful manner so as not to further agitate them.
- Individually listen to the individual's needs or complaints to see if the issue can be resolved at that time.
- Any employee can do this, but if the situation escalates, inform the manager on duty.
- If speaking to the individual does not deescalate the situation, Management personnel shall inform the individual that they must regain their composure, or they may be escorted from the premises.
- If this does not deter the individual, security shall be notified.
- If the individual refuses to leave on their own accord, security shall escort the individual off the premises.
- If the individual becomes physically aggressive (i.e. throwing things, touching others, or otherwise threatening to harm anybody), they must be escorted off the premises.
- If the situation escalates any further, press one of the silent alarms, if safe, and remain calm until law enforcement arrives.
- Document the encounter and inform the state.

Response to Hostile Intruder

- Agents will immediately dial 911 or activate one of the panic/duress alarms located throughout the Facility and connected to local law enforcement authorities when it is safe to do so.
- Agents will alert all occupants within the Facility to find a safe location.
- If deemed life threatening, agents must not engage or confront the intruder—await response from law enforcement.
- If safe to do so, agents must evacuate the surrounding area immediately.
- Agents must close and secure all doors if it is safe to do so.
- If unable to safely exit the building, agents will seek shelter in a room where doors can be locked or barricaded securely.
- Agents must turn off lights in room.
- Agents will remain out of sight of doors and windows.
- Agents will remain quiet and turn off the volume on cell phones.
- Once safely in a secure room, security agents or any other individual will contact law enforcement by dialing 911 and give the location and number of people in the room.
- Agents must follow all instructions provided by the 911 operator.
- If unable to speak, agent will leave phone line open to allow the 911 operator to hear what is occurring in the room.
- If responding law enforcement officials are encountered, agent must keep hands elevated and palms visible.
- If the fire alarm sounds, agents must remain in place unless fire or smoke is detected or advised to do so by the 911 operator.
- Agents must 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 nearest safe exit or safe area.
- If able to safely exit the Facility, agents must not return until it is declared safe to do so by law enforcement and/or fire officials.
- Agents will follow all instructions issued by law enforcement and/or fire officials.

Response to 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 Director of Security or a security agent immediately.
- Security agents will remain at the location of suspected compromise when possible.
- Agents must immediately notify the Director of Security for a determination of actions to be taken.
- 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 from law enforcement and notify the Commission as required.
- If immediate evacuation is necessary due to an emergency, 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 Operating Officer.
- Any emergency or event that would inhibit or prevent the proper safeguarding of inventory will be reported immediately to the Director of Security.

Emergency Evacuation Plan

- In the event of a fire or other emergency in which evacuation is necessary, an agent designated by the Director of Security will be responsible for coordinating and directing an orderly evacuation of each assigned section of the Apothca Facility. Drills for evacuation and lock down will be coordinated with law enforcement. Evacuation priorities for agents consist of the following:
 - Moving occupants who are closest to the danger to a safe area near or at an emergency exit;
 - Directing occupants to evacuate the building through the nearest emergency exit; and
 - After safely exiting the building, proceeding directly to the predetermined assembly area to participate in “roll call” led by the Director of Security.
- In the event that Apothca receives a bomb threat, the agent receiving the threat should immediately notify a manager and dial 911. In the event of a bomb threat and/or explosion, all occupants should be evacuated as described above.
- In the event of a fire, the agent discovering the fire should activate the internal fire alarm immediately.
- Security agents should dial 911.
- If safe to do so and at the agent’s discretion, the agent will attempt to extinguish the fire.
- If possible, agents leaving the affected area will attempt to turn off electrical equipment and close doors against the fire.
- All occupants will exit the building using the nearest 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 will be tested on a monthly basis.
- Fire extinguishers and the fire suppression system will be tested/inspected on an annual basis.
- The Director of Security will ensure that an annual fire evacuation drill is conducted, documented, and performed in consultation with the local fire department.
- Fire evacuation maps will be clearly posted throughout the Apothca Facility.

Response to 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 and 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 nearest 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 local fire department.
- Fire evacuation maps will be clearly posted around the Apothca facility and agents will 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 procedures 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; and
 - Continue monitoring 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.

Cash Management

Agents that handle and store cash are responsible for the funds while under their control. Apothca will limit the amount of cash in cash drawers by limiting the amount of cash in each

cash drawer at the beginning of an agent's shift and by conducting frequent cash sweeps throughout the day. These measures are designed to reduce the risk of discrepancies and allow for frequent counting to occur.

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

All cash will be secured in a safe and stored in a vault room. The safe will have a four (4) digit combination lock with a slot in which to drop in cash. 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 Operating Officer, Director of Security, and Director of Cultivation.

A record of the names of persons having access to the vault room will be maintained by the Director of Security. Access to the vault room is highly restricted and is safeguarded via the use of card key access. Each agents processing transactions is assigned a dedicated POS terminal and cash till. Cash will be counted by till in the following manner:

- Prior to a shift starting by the agent collecting the till and verified by a supervisor; and
- At the end of a shift – each agent is required to reconcile his/her cash drawer at the end of his/her scheduled shift with verification by a supervisor
- The final cash from the agent's shift will be dropped into the cash-drop portion of the safe in the vault room

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 the Apothca facility to the bank of deposit by a third-party vendor or the Director of Security. Pickups will occur frequently, or as requested by the Chief Executive Officer, Director of Security, or Chief Operating Officer. At no time will agents be transporting cash to/from the bank of deposit with the exception of the Director of Security.

Limited Access Areas

Consumer Access

- All individuals trying to access an Apothca retailer facility will be positively identified to limit access to individuals age 21 years or older.
- Apothca agents must positively identify all individuals to whom marijuana products are being transferred to confirm that each individual is 21 years or older.

Authorized Visitor Access

- Authorized visitors (i.e. outside vendors, contractors and visitors pursuant to 935 CMR 500.110(4)(e)) will be issued a Visitor Badge and be escorted by an authorized Apothca 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.

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.
- Agents will visibly display their Apothca 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 consumers and other 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

Perimeter Controls, Monitoring, and Controlled Access

- Individuals who are not engaged in an activity expressly permitted under 935 CMR 500.000 are prohibited from the premises of an Apothca facility.
- Proper lighting will be used and maintained at all times, including after normal business hours, in and around an Apothca facility. 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 twenty-four (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, and intercoms. In addition, there is a one-sided window in the security office allowing security agents to view individuals as they approach the main entrance to the dispensary.

Security Checks and Inspections

The Director of Security or a designated alternate will conduct regularly scheduled security checks of the Apothca facility. As an added precaution, areas within the Apothca facility (e.g. growing, processing, and inventory) will be routinely checked throughout the day and at the beginning and close of each operational period to ensure that materials, equipment, and rooms appear to be properly maintained. If an area is not found to be in order, security agents will contact the Director of Cultivation 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, state and local law enforcement, consumers, visitors, and the Apothca 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 proximity reader components, 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 24-hour period.
- IDS Operations
 - The IDS will have all external zones activated twenty-four (24) hours a day, and internal zones will be armed on a regularly scheduled time period. A daily record will be maintained at the Apothca facility and will identify 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 the IDS 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 the Apothca facility, response time until security staff arrived at the alarm location, nature of the alarm, and relevant response actions.
- Surveillance Room
 - All security system equipment and recordings will be maintained in a secure location on-site that will remain locked and will not be used for any other function.
 - Access to the designated rooms will be limited to those agents that are essential to surveillance operations, law enforcement authorities acting within their lawful jurisdiction, authorized security system service personnel, and the Commission.

- A current list of authorized agents and service personnel that have access to designated security rooms and surveillance rooms will be made available to the Commission and law enforcement officials upon request.
- Power Outage
 - Apothca has a 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.
 - Apothca will immediately notify appropriate law enforcement authorities and the Commission 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 935 CMR 500.110(5)(a)(4)-(9), 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 Apothca, the perimeter of the building, and in all parking lot areas. In addition, the following requirements will be met:
 - Cameras will be present in all areas within the Apothca facility.
 - Camera placement is capable of clearly capturing any person entering/exiting the Apothca facility.
 - All video recordings contain a date/time stamp.
 - Cameras will be angled to capture a clear and certain identification any person entering/exiting Apothca 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 (24) hour recordings from all video cameras will be available for immediate viewing by the Commission 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 Apothca 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

Apothca will have a failure notification system that will send an alert to designated employees of Apothca within five minutes after the failure pursuant to 935 CMR 500.110(5)(a)(1)-(3).

Internal Alarms

For the safety of all agents, consumers, state or local law enforcement, and authorized visitors, panic/duress alarms will be located throughout the Apothca facility and connected to local law enforcement authorities.

Incident Reporting

Overview

- **Reportable Incidents:** Apothca will immediately notify local law enforcement officials and the Commission within twenty-four (24) hours after discovering the following:
 - Discrepancies identified during inventory, including diversion, theft, loss, and any criminal action involving Apothca or an Apothca 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 marijuana;
 - An alarm activation or other event that requires response by public safety personnel;
 - The failure of any security alarm system due to a loss of electrical power or mechanical malfunction that is expected to last longer than eight hours; and
 - Any other breach of security.
- **Documenting and Reporting:** Within ten (10) calendar days, Apothca will provide written notice to the Commission of any incident described above, by submitting an incident report in a form and manner determined by the Commission that details the circumstances of the event, any corrective actions taken, and confirmation that the appropriate law enforcement authorities were notified. Reports and supporting documents, including photos and surveillance video related to a reportable incident will be maintained by Apothca for a minimum of one (1) year and made available to the Commission and to law enforcement authorities acting within their lawful jurisdiction upon request.

Documenting and Reporting

Within ten (10) calendar days, Apothca will provide written notice to the Commission of any incident described above, by submitting an incident report form, detailing the incident, the investigation, the findings, resolution (if any), confirmation that local law enforcement 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 Apothca for a minimum of two (2) years and made available to the Commission and to law enforcement authorities acting within their lawful jurisdiction upon request.

Using BioTrack, Apothca will document all handling of marijuana as plants move through the different rooms located within a Apothca facility. Agents who handle marijuana or marijuana products will be appropriately monitored through video surveillance. All finished marijuana and marijuana product inventory will be audited on a weekly basis, while certain inventory will be audited on a daily basis (e.g. contents of the Dry Room). Inventory audits will identify any discrepancies and/or suspected diversion. Apothca agents will be subject to random security checks, including searches of personal items brought into a facility.

Marijuana Establishment Internal Audit

Security Audits

In addition to the monthly security system inspection, Apothca will perform a security system audit using an external vendor approved by the Commission. The audit report will be submitted to the Commission no later than thirty (30) calendar days after the audit is conducted. If the audit identifies areas for improvement related to the security system, Apothca will also submit a plan to mitigate those concerns within ten (10) business days.

Security Recordkeeping

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