Body and Mind
719 Sugar Ln.
Elyria, Ohio 44035
Tel. (440) 610-1436
Email: *jenniferwhiting@bodyandmind.com*

STANDARD OPERATING PROCEDURES 2024

NMG OH P1, LLC

License No. MMCPP00095

719 Sugar Ln.

Elyria, Ohio 44035

Table of Contents

BUSINESS OPERATIONS PLAN

Operations Plan

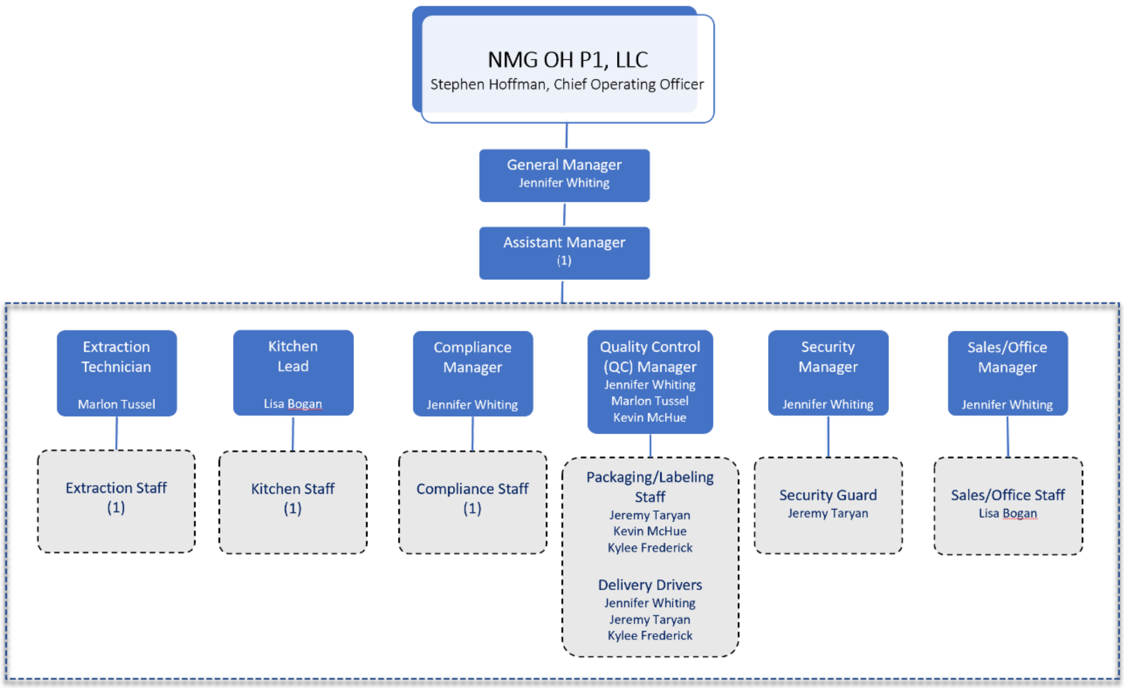
NMG OH P1, LLC (hereinafter the "Company") designed its Standard Operating Procedures ("SOPs") to clarify processor operational policies and procedures of the facility and to acquaint employees with the rules concerning processing, inventory management, and general business practices. These SOPs are based on Company's original application with the State of Ohio and apply to all employees. Company reserves the right to modify, rescind, delete, or add to the provisions of these SOPs from time to time in its sole and absolute discretion and guidance from the State of Ohio Department of Commerce and Board of Pharmacy (collectively, the "Department").

The Company designed its operations and SOPs to accomplish the following:

- Designate areas in the facility that are compartmentalized based on function, such as the marijuana extraction area, with restricted access between the different areas based on access credentials assigned by the facility.
- Implement policies and procedures that provide best practices for safe, secure, and proper processing of medical marijuana, which includes restricted movement between the different production areas by personnel.
- Establish training and safety policies and procedures to ensure that any person involved in processing medical marijuana:
    - Has been fully trained in the safe operation and maintenance of any and all equipment that must be used for processing medical marijuana, with supporting documentation of the training.
    - Has been fully trained in the safe use, handling, and storage of any and all chemicals that must be used for processing medical marijuana, in accordance with OSHA protocols, with supporting documentation of the training.
    - Has been fully trained in the safe and sanitary execution of any applicable post-extraction refining protocols.
    - Has been fully trained in the safe and sanitary execution of any applicable manufacturing processes, including any applicable food safety standards under Chapter 901:3-1 of the Administrative Code.
    - Has direct access to applicable material safety data sheets and labels.
    - Has been fully trained regarding compliance with Chapter 3796. of the Revised Code and the rules promulgated in accordance with Chapter 3796. of the Revised Code.
- Document the chain for all medical marijuana in the inventory tracking system.
- Establish sanitary operating procedures for the facility to be maintained in a clean and orderly condition, which includes free from infestation by rodents, insects, birds, and other animals of any kind.

- Maintain a facility with adequate lighting, ventilation, temperature, sanitation, equipment, and security for the processing of medical marijuana.

Organizational Chart



Extraction Manager

The facility has designated the Extraction Manager to train and supervise employees in the use of extraction equipment and associated solvents. The Extraction Manager has at least 3 years of experience in the operation of the equipment being used in the facility or similar equipment.

Kitchen Manager

The facility has designated the Kitchen Manager to train and supervise employees in the use of kitchen equipment and associated ingredients.

Days of Operation

Operational hours at the facility will be Monday through Friday.

Hours of Operation

The facility operates between 8am and 4:30pm.

Emergency Contacts

1. Jennifer Whiting, General Manager

Telephone: (440) 610-1436

Email: jenniferwhiting@bodyandmind.com

2. Kayla Greenberg

Telephone: (419) 606-9549

Email: kaylagreenberg@bodyandmind.com

3. Stephen Hoffman, Chief Operating Officer

Telephone: (303) 396-5921

Email: triphoffman@bodyandmind.com

Closing During Normal Business Hours

If the facility needs to be closed during normal business hours for any reason, then the following steps must be taken:

- Inform the General Manager or Chief Operating Officer immediately.
- If the closure must last more than 2 business days, immediately notify the Department.

Employees

Employee Training

Initial job training must be conducted by the General Manager, in conjunction with an Employee Handbook and one-on-one personal instruction. Training must consist of general job requirements and use of the state-approved tracking system, METRC. Continued training must be conducted during annual performance reviews. All training must be documented, which becomes a part of the employee's permanent record.

Disqualifying Offenses

No individual may obtain an employee identification card if any of the following conditions exist:

- The applicant has committed or been convicted of a disqualifying offense.
- The applicant is under 21 years of age.
- The applicant failed to disclose or submit the appropriate materials, as required by the Department.
- For any other reason that the Department determines.

New Hires

The General Manager is responsible for submitting the following information for every person seeking employment at the facility.

- A completed employment application
- Valid identification
- A recognizable headshot photograph taken no more than 6 months before the date of the

employment application.

- Application fee
- Any other information requested by the Department.

Employee Identification Cards

Every owner, principal officer, board member, employee, administrator, agent, or other person who may significantly influence or control the business activities must apply to the department for an employee identification card and be designated as a Type 1 or Type 2 individual. No employee may begin working at the facility prior to receiving their employee card. The employee card contains the cardholder’s name, business license number, date of issuance, expiration date, a random ten-digit alphanumeric identification number, a photograph of the cardholder.

Type 1: An owner, administrator, or individual that has control and management over the day-to-day activities that significantly impact the operations of the cultivator, processor, or testing laboratory. **Type 1 access permits the cardholder to enter every area of the medical marijuana entity facility**. The facility must designate one and may designate up to three Type 1 cardholders as a key employee. A key employee shall be responsible for all activities at the facility and must serve as the point of contact for the facility with the department.

Type 2: A board member, officer, employee, or agent permitted to enter the production and non-production areas of the facility designated in the facility plans and specifications submitted by the business. **A Type 2 cardholder is not permitted to access the areas containing the vault, security equipment, and other equipment related to the facility's surveillance operations.**

Employee Card Revocation

Upon termination or completion of services, employee identification cards must be immediately returned to the General Manager. In the event there is a revocation or expiration of an employee identification card, the General Manager must immediately notify the Department with the circumstances around the termination, expiration, or revocation within 1 business day. The General Manager must also ensure the employee identification card is returned to the Department within 15 calendar days.

Notifying the Department

The General Manager is responsible for notifying the Department regarding the following information:

- In the event any employee information changes, the Department must be notified by the General Manager within 5 business days after such a change.
- If it is discovered that the employee has been arrested for activities that would constitute a disqualifying offense, the General Manager must immediately notify the Department.
- If an employee card is lost, destroyed, or stolen, the General Manager must immediately report the loss to the Department and law enforcement, if required. Any cardholder that

reports a lost, destroyed, or stolen identification card must apply for a replacement card.

Safety Training

All Managers must attend and pass a course on OSHA regulations and procedures regarding a commercial processing facility, local and state safety policies and procedures, company-wide policies for standard operations, and emergency procedures. The Kitchen Manager must attend and obtain a Manager (level 2) Food Safety Certification from an approved course provider in the State of Ohio.

Employees in the extraction room must be trained by the Extraction Manager in the proper operation of the systems, assembly, recovery of used butane, emptying the collection pot, disassembly, and proper cleaning and sanitizing the unit comprehensive training in every aspect of operating, testing, and sanitizing the unit, including OSHA safety policies and procedures. The Kitchen Manager must train kitchen employees on proper food safety practices for use in the kitchen room, proper cleaning and sanitation practices, and OSHA safety policies and procedures.

Visitors

Visitor Identification Badge

Visitors are considered any individual that is not a holder of a valid employee identification card. Visitors are prohibited from entering the facility unless they receive authorization and obtain a visitor identification badge from the facility. To obtain a visitor badge, visitors must provide a valid identification with a photograph.

All visitors who obtain a visitor badge must do the following:

- Always be escorted and monitored by an assigned registered employee of the facility.
- Visibly display his or her visitor identification badge while he or she is on premises.
- Return the visitor identification badge upon leaving the premises.

Visitor Logs

The facility maintains visitor logs to track visitors at the facility. All visitors must sign and date the log upon visiting the facility. The visitor log must contain the following information:

- Name of the visitor.
- Date and time of arrival and departure.
- The assigned registered employee at the facility escorting and monitoring the visitor.
- Purpose of the visit.

Inspection by Government Agent

State of Ohio government employees are authorized to enter to inspect the facility premises without any notice. When a Government Agent arrives as the facility, employees must follow these steps:

- Ask the person to identify themselves by showing credentials and log their name and contact information into the visitor logbook for record-keeping.
- Conduct yourself in a professional and respectful manner under all circumstances.
- Call the General Manager as soon as possible.
- Answer any questions to the best of your knowledge and escort them to any area of the facility they are requesting to inspect.
- If you are unsure how to answer a question, wait for the General Manager to arrive or connect the Agent by phone.
- Government employees are authorized to look at records, manifests and logbooks, so provide them with access to any of those items.
- Take notes about the questions they ask and the answers you provide in response.
- If access is needed to the video surveillance systems, the leading KEY-badged employee on staff should assist them following the Video Security Management Procedure.

Prohibited Activities

All owners, managers, and employees at the facility are prohibited from the following activities. Any violation of Department rules, including prohibited activities, may result in immediate disciplinary action and termination, and consequently, reporting to the Department and local authorities.

- Do not sell any medical marijuana in any form to a patient or caregiver.
- Do not consume medical marijuana on premises.
- Do not process or manufacture a form of marijuana not permitted or approved by the Department.
- Do not manufacture medical marijuana products that exceed 70% THC content.
- Do not manufacture medical marijuana an excess of the quantity required for normal, efficient operations.
- Do not directly or indirectly discriminate in price between different dispensaries that are purchasing a similar grade, strain, brand, and quality of medical marijuana. All prices must be approved by the General Manager.
- Do not change the use or occupancy of the facility. Only approved activities may be conducted onsite.

Code of Conduct

Employees and authorized visitors must abide by the rules and regulations required by the Department. In addition, the guidelines for individual conduct listed below must be enforced and any clients not abiding by these conduct requirements must be denied entry into the facility.

Good NeighborPolicy

The Management of this facility has great respect for the local community. Company has worked hard to establish a positive relationship with our neighbors, the city, and the community. Please be respectful of our neighbors' rights, privacy, and property.

Responding to Complaints

It is the Company's policy to respond to any reasonable complaint and provide a proposed solution within 10 business days. All neighbor communications received must be immediately forwarded to the General Manager and saved electronically as part of company records. Company must avoid adversarial positions, treat others as one would like to be treated, and cooperate with neighbors to ensure a healthy community.

Employee Commitments

Employees are encouraged to help the Company keep its commitments to the neighbors by not creating a nuisance or lingering in the parking lot or sidewalk areas. Always be careful and courteous when entering or exiting the parking lot or facility. With the support of our employees, we plan to be here to serve and support the community for many years.

Employees are required to follow these good neighbor policies:

- No medical marijuana from the facility may be transferred, gifted, sold, disseminated, or otherwise transmitted to any individual or third-party.
- No medical marijuana may be consumed on premises.
- Do not consume medical marijuana and operate heavy machinery or motor vehicles.
- Dispose of trash and recyclables in appropriate receptacles.
- Always display employee identification while on premises.
- Do not leave children or pets unattended in the parking lot or vehicle.
- Never park vehicles in a neighboring parking lot or bus stop. Employee vehicles may only be parked in designated areas on the facility lot.
- Loitering is strictly prohibited.

Opening and Closing the Facility

Opening the facility

At the beginning of each day, employees opening the facility must compete the following items:

1. Upon entering the facility, make sure the door is closed behind you and disable the alarm.
2. Clock in.
3. Turn on all lights.
4. Turn on scales.
5. Make sure all equipment is functioning.

6. Check the video surveillance screens to ensure all cameras are working properly.
7. Log into Track and Trace System.
8. Open daily inventory tracking sheet.
9. Change date.
10. Add names of all employees working that day.
11. Count all front-of-house inventory item and record as starting amounts in the inventory tracking sheet.
12. Compare to ending amounts from prior day.
13. Ensure that all inventory counts from the start of day agree with the prior end of day amounts.
14. Any front-of-house inventory discrepancies must be recorded in the inventory tracking log and addressed with the General Manager.
15. Count all cash from the safe and make sure they add up to correct amount.
16. Sign off on correct daily count log, as well as prior day closing paperwork.
17. Update inventory tracking sheet.

Closing the facility

Before completing any closing tasks, employees must secure the facility by completing the following steps:

1. Run inventory.
2. Upload Track and Trace System.
3. Count cash in safes
4. Check and verify that security equipment is functioning.
5. Lock the front door.

Running Inventory

1. Count all inventory and record on inventory tracking sheet in the PM Section.
2. Go to the inventory page of the Track and Trace System and export the end-of day inventory list.
3. Enter the inventory amounts in the inventory tracking sheet next to the physical count values and compare.
4. If any inventory units are not in agreement between the Track and Trace System and the physical count, notify the General Manager immediately.
5. If the inventory difference is easily explained, the General Manager must make the appropriate

adjustments and record the actions in the inventory events log.

6. If the inventory difference is suspected to involve any form of diversion, local authorities and the Department must be notified immediately, and a description of the event must be recorded in the inventory events log.
7. Print an accurate running inventory tracking sheet and file it in records storage.

Upload State-approved tracking system METRC

1. Export the day's transactions in the form appropriate to upload into the state-approved tracking system METRC.
2. Upload the transaction file into the state-approved tracking system METRC.

Counting Cash in Safes

1. Take the till count sheet from safe.
2. Physically count all the cash in the safe.
3. Figure out how much is there to deposit.
4. For any discrepancies over $5 write reason in the Safe notation section.
5. Write amount and sign off on Daily Till Count Log.
6. Write amount on Cash Form for deposit and fill out any excess information.
7. File deposit in deposit-bags and place in safe.
8. Make sure safe is locked.

Other Closing Tasks

1. Turn off scales.
2. Clean dishes.
3. Sleep all computers.
4. Wipe down tables and counters.
5. Take out trash and cardboard recycling.
6. Turn off all lights.
7. Set alarm, lock door, and double check that the door is locked after exiting.

Cash Handling Procedures

Although the facility does not actively use or store cash, there may be times when it may be necessary to handle and store cash received from buyers. In the event the facility receives cash, the following steps must be followed for all cash handling processes:

Pre-Opening

1. General Manager must count all cash on hand in the Vault and safes to confirm all cash from prior day is accounted for.
2. Record the cash levels in the Cash Ledger under the day's "Beginning Cash on Hand Balance."
3. Count all cash deposited into the safe from prior day and validate it against the sum of each sales recorded in the count sheets. Discrepancies more than five dollars ($5) must be recorded in a slippage tracking log and must be investigated by the General Manager.

Deposits

- On the scheduled pick-up dates, the General Manager must prepare a deposit for pick up by the scheduled armed cash pick-up service for deposit into the business bank account. The deposit must be recorded as a withdrawal from the cash funds in the cash log.
- On deposit pick up dates, the armed cash pick-up service must record the unique serial ID of the tamper-evident, sealed cash deposit bag, enter that serial identification number in a log sheet with the date, time, amount, and ID number of the armed cash pick up service employee, and proceed to take the cash to the federal treasury for deposit on behalf of the business bank account.

Advertising

Definition

Advertising is the written or verbal statement, illustration, or depiction created to induce sales using a combination of letters, pictures, objects, lighting effects, illustrations, or other similar means. An "advertisement" includes brochures, promotional and other marketing materials. All advertising must be approved by the General Manager and submitted to the Department for review and approval.

Prohibitions

Advertisements by the facility may not be placed or maintained in any of the following ways:

- Within five hundred feet of the perimeter of a prohibited facility, a game arcade where admission is not restricted to persons aged twenty-one years or older, or a business where the placement of the advertisement targets or is attractive to children.
- On a billboard
- On a radio or television broadcast, including a system for transmitting visual images and sound that are reproduced on screens, and includes broadcast, cable, on-demand, satellite, or internet programming.
- On any handheld or other portable sign.
- On a handbill, leaflet or flyer directly handed, deposited, fastened, thrown, scattered, cast, or otherwise distributed to any person.

- Left upon any private property without the consent of the property owners.
- On or in a vehicle, public transit vehicle, or public transit shelter.
- On or in a publicly owned or operated property.

Regardless of the medium, advertisements cannot:

- Include any image bearing a resemblance to a cartoon character, fictional character whose target audience is children or youth, or pop culture icon.
- Market, distribute, offer, sell, license, or cause to be marketed, distributed, offered, sold, or licensed, any apparel or other merchandise related to the sale of medical marijuana, to an individual under eighteen years of age.
- Suggest or otherwise indicate that the product or entity in the advertisement has been approved or endorsed by the department, the state of Ohio or any person or entity associated with the state of Ohio.
- Advertise in a manner that is inconsistent with the medicinal and approved use of medical marijuana.
- Encourage the use of medical marijuana for a condition other than a qualifying medical condition.
- Contain any statement, design, representation, picture, or illustration that is false or misleading, contains any additional names beyond the registered marijuana name, disparaging, obscene or indecent, or related to the safety or efficacy of medical marijuana.

Displays and Apparel

In addition to above, the following activities are strictly prohibited:

- Display external signage larger than 16 inches in height by 18 inches in width that is not attached to the facility's exterior.
- Illuminate a sign advertising a medical marijuana product or strain.
- Sell or otherwise distribute clothing, apparel, or wearable accessories, unless such sale or distribution is to an employee for purposes of identification while at the licensed facility.
- Advertise medical marijuana brand names or utilize graphics related to medical marijuana on the facility's exterior.
- Display medical marijuana, medical marijuana products, or medical marijuana paraphernalia that is visible from the exterior of the facility.

Web Channels

The following activities on the web are strictly prohibited:

- Allow for direct engagement between consumers or user-generated content or reviews.

- Provide a medium for website users to transmit website content to individuals under the age of eighteen.
- Target a consumer group with a high likelihood of reaching individuals under the age of eighteen.
- Display or otherwise post content that has not been submitted to the department.
- Transact business or otherwise facilitate a sales transaction to consumers or businesses.
- Maintain a web presence that would otherwise violate the Department rules.

Internet Outage

Overview

In the event of an internet outage or wireless disconnection, the General Manager or Assistant Manager must immediately create a wireless internet hotspot through the facility's cell phone and connect the workstations to the new wireless internet hotspot. The General Manager and Assistant Manager are the only employees permitted to have and maintain the wireless internet hotspot password.

Preparation

1. Verify that all printers are hardwired and plugged directly to the workstations. All printers must be connected directly to the workstations.
2. Verify that the Company Cell Phone is not connected to any wireless network.
3. Verify that the Company Cell Phone has a Personal Hotspot option under **Settings** or **Cellular.**
    - If there is no Personal Hotspot option on the Company Cell Phone, immediately contact the Company Cell Phone provider to add a Personal Hotspot option.

Create a Personal Wireless Internet Hotspot

The General Manager must enable a wireless internet hotspot through the Company Cell Phone.

1. Go to **Settings** in the Company Cell phone.
2. Go to **Cellular** or **Personal Hotspot** selection and enable the **Personal Hotspot**.
3. Enable **Allow Others to Join** to ensure the workstations can connect to the hotspot.
4. Find and remember the personal hotspot password.

Connect Workstations to the Wireless Internet Hotspot

The General Manager must connect each workstation to the new wireless hotspot, including the Track and Trace System.

1. Click on the wireless symbol located at the bottom right-hand corner of the workstation.
2. Find and click the new wireless internet hotspot connection that was just created on the

Company Cell Phone.

3. Click **Connect**.
4. Type the password listed under Personal Hotspot on the Company Cell Phone.
5. Click **Next**
6. If the workstation successfully connects to the new wireless hotspot, repeat steps 1-3 for each workstation.

Troubleshooting Workstation Internet Connections

1. Confirm that the correct password was entered to connect the workstation to the new wireless internet hotspot. Reenter the password again.
2. If you are still unable to connect the workstation to the new wireless internet hotspot, go to **Control Panel.**
3. Select **Network and Internet.**
4. Select **Connect to a network**.
5. Find and click the new wireless internet hotspot connection you just created on the Company Cell Phone.
6. Click **Connect**.
7. Type the password.
8. Click **Next**
9. If the workstation successfully connects to the new wireless hotspot, repeat steps 1-8 on each workstation.
10. If there is still no connection, immediately contact the General Manager.

Confirm Connections

The General Manager must confirm that all workstations are functioning properly after connecting to the wireless hotspot.

1. Check to make sure the workstation is connected to the new wireless internet hotspot connection.
2. From the Track and Trace System stations, open Weave and make sure the software opens and functions properly.
3. From the Check-in station, open the verification software and make sure it opens and functions properly.

Monthly Hotspot Tests

Every month, the General Manager and Assistant Manager must conduct a test to make sure the

Cell Phone creates a personal hotspot and workstations can be connected to the wireless internet hotspot.

1. Follow all the steps outlined under Internet Outage.
2. If the connection to a wireless internet hotspot fails, immediately contact the General Manager.

Compliance

Daily

1. Observe all employee employees to ensure proper badge possession and display, if required.
2. Visual awareness of Restricted Access signage.
3. Visual awareness of building security system.
4. Visual awareness of video surveillance system.
5. Visual awareness of physical building security and safety.
6. Visual awareness of employee labor law documentation displays.
7. Approve all product testing requirements.
8. Address any standard procedure failures.

Weekly

1. Review all employee employees' badge expirations and plan for renewals.
2. Review and ensure that all employee employees on the NMG's list are current.
3. Hands-on video surveillance operational check.

Monthly

1. Prepare and file monthly reports as required by the Department.
2. Inspect video surveillance equipment and test video clip extraction procedures and update as necessary.
3. Review marijuana establishment designated employee status (for state-approved tracking system METRC, Track and Trace System, product testing requirements, personnel training and security/video surveillance systems), and remind personnel of significance.

Quarterly

1. Review Department of Labor laws ensuring that all requirements are being practiced and that all required documentation displays are up to date.

Annually

1. Apply for all license renewals.

2. Organize local authority annual on-site inspections for all facilities.
3. Schedule and direct third-party annual compliance audit for all facilities.

Accounting

Daily

1. Gather payments received from prior day sales, and count, verify, and report.
2. Prepare deposits for pickup.
3. Enter invoices, prepare payments as scheduled.
4. Reconcile all accounts.

Biweekly

1. Prepare and disburse payroll.
2. Prepare and pay payroll withholding taxes (state and federal).

Monthly

1. Calculate monthly sales tax.
2. File state sales tax report and make sales tax payment.
3. Prepare banking diligence reports (sales, taxes, state-approved system sales, in-house accounting system sales, wholesales), file banking diligence reports.

Quarterly

1. File and pay City/County/State quarterly fees.
2. File and pay any outstanding Federal taxes.

Annually

1. Oversee, comprise end-of-year inventory valuation.
2. Finalize annual year-end in-house books.
3. Interface with tax accountant to prepare and provide all tax-related documents.
4. Ensure proper filing of annual corporate tax forms.

Packaging and Labeling

Type of Packaging

Before distributing product to a dispensary, employees must ensure that all medical marijuana is placed in a child-proof, tamper-evident, light-resistant package approved by the Department. Packaging must maintain its integrity and stability and comply with the Department rules and procedures.

Weight and Measures

All scales in the packaging area must be regularly calibrated for accurate and immediate documenting of product weights. The General Manager must ensure the following for each commercial weighing and measuring device used in the facility:

- The commercial device is licensed pursuant to the requirements set forth by the Ohio Department of Agriculture, Weights and Measures Division.
- The scales are regularly calibrated using National Institute of Standards and Technology (NIST) reference weights at least once each calendar year by an independent third-party approved by the Department.
- The documentation of licensure of the commercial device is maintained within the facility at all times.
- A copy of the commercial device license can be made available immediately upon request from a Department representative.

Laboratory Testing

Prior to any sale of medical marijuana to a dispensary, an employee from a licensed testing laboratory must select, at random, a sample from every lot of medical marijuana product at the facility that is of sufficient quality to perform the required tests. Laboratory testing must be complete and verified before any sale of medical marijuana to a dispensary, which includes obtaining a Certificate of Analysis for every sample of medical marijuana tested.

At a minimum, laboratory testing must test the product sample for the following items:

- Microbial contaminants
- Cannabinoid potency, including:
    a. Delta-9-tetrahydrocannabinolic acid (THCA).
    b. Delta-9-tetrahydrocannabinol (THC).
    c. Cannabidiolic acid (CBDA)
    d. Cannabidiol (CBD).

If the medical marijuana extract used in the manufacturing of products was not previously tested by a licensed testing laboratory, the product sample must also be tested and analyzed for the following items:

- Mycotoxins.
- Heavy metals, including, at a minimum, arsenic, cadmium, lead, and mercury.
- Pesticide and fertilizer residue.
- Residual solvents, if a solvent other than carbon dioxide was used in the extraction process.

If the medical marijuana product was manufactured using plant material acquired from a dispensary, the product sample must also be tested and analyzed for the following items:

- Microbial contaminants
- Cannabinoid potency, including:
    a. Delta-9-tetrahydrocannabinolic acid (THCA).
    b. Delta-9-tetrahydrocannabinol (THC).
    c. Cannabidiolic acid (CBDA)
    d. Cannabidiol (CBD).
- Mycotoxins.
- Heavy metals, including, at a minimum, arsenic, cadmium, lead, and mercury.
- Pesticide and fertilizer residue.
- Residual solvents, if a solvent other than carbon dioxide was used in the extraction process.

Certificate of Analysis

After the medical marijuana is tested by the licensed testing laboratory, a Certificate of Analysis must be provided to the General Manager by the testing laboratory detailing the test results. No medical marijuana may be sold or distributed without a package or label containing the information from the Certificate of Analysis.

All Labels

All product labels must include the following information:

- The name and license number of the cultivator where the packaged plant material was cultivated or the name and license number of the processor where the medical marijuana products were manufactured.
- The name and license number of the dispensary facility receiving the shipment.
- The product identifier.

- The registered name of the medical marijuana plant material strain that was registered with the department or the registered name, form, and dose of the medical marijuana product that was registered with the department.
- A unique batch or lot number that must match the medical marijuana or medical marijuana products with a batch or lot, to facilitate any warnings or recalls the department deems appropriate.
- The dates of manufacture, final testing, and packaging.
- The total weight in grams of medical marijuana or medical marijuana products in each package.
- The name and license number of the independent testing laboratory that performed the required tests on the batch or lot from which the medical marijuana or medical marijuana products in the package were taken.
- The laboratory analysis and cannabinoid profile, including the percentage content by weight or total milligrams and milligrams per unit for:
    - Delta-9-tetrahydrocannabinol (THC);
    - Delta-9-tetrahydrocannabinolic acid (THCA);
    - Cannabidiol (CBD); and
    - Cannabidiolic acid (CBDA).
- The expiration date, which shall not exceed one calendar year from the date of manufacture.
- If the product is edible, the following additional information:
- A list of all ingredients and subingredients, providing that all ingredients comply with the standards of identity under rule 901:3-1-12 of the Administrative Code.
- If a marijuana extract was used in the manufacture of the product, a disclosure of the type of extraction process and any solvent, gas, or other chemical used in the extraction process or any other compound added to the extract.
- A list of all major food allergens as identified in 21 USC 343.
- The intended method of administration of the medical marijuana product.

Manufacturing Label

After each manufacturing process is completed, the following information must be included on a label and attached to the container of medical marijuana products:

- The processor's name and license number.
- The registered product name.
- The batch numbers of any batches of medical marijuana extract used in the manufacturing

process.

- The date of manufacture.
- The net weight and unit count of medical marijuana products prepared or packaged for sale to a licensed dispensary.

Extraction Label

After each extraction process is completed, the following information must be included on a label and attached to the container of medical marijuana extract:

- The facility name and license number.
- The batch numbers of any batches of plant material used in the extraction.
- The registered strain names of any plant material used during the extraction.
- The batch number assigned to the batch of medical marijuana extract.
- The date of extraction.
- The net weight and volume of medical marijuana extract.

Warnings

Product labels must contain the following cautions and warnings:

- "Caution: When eaten or swallowed, the effects and impairment caused by this drug may be delayed."
- "This product is for medical use and not for resale or transfer to another person. This product may cause impairment and may be habit-forming. This product may be unlawful outside the State of Ohio."

If the product was manufactured using plant material that was acquired from a dispensary, a statement with the following language:

"This product was manufactured using medical marijuana that exceeded the expiration date defined in OAC 3796:1-1-01."

Universal Symbol

Edible products must contain the following universal symbol to each portion of the medical marijuana product. The size of the universal symbol must be determined by the size of the portion, not the overall product size, and cannot be less than 1/4 inch by 1/4 inch.

Must be at least 1/4 inch by 1/4 inch.

The Universal Symbol must be applied to the label according to the following:

- If the medical marijuana product is presented as separate single portions, the universal symbol must be applied to each single portion.
- If the medical marijuana product is presented as a single unit comprised of more than one portion, clearly visible lines of demarcation between portions must be made and the universal symbol applied to each portion.

Free Samples

Upon approval by the General Manager, free samples must be packaged in a sample jar protected by plastic or metal mesh screen to allow patients and caregivers to smell the sample material before purchase. Sample jars may not contain more than 3 grams of a particular strain or be sold to a patient or caregiver.

Production Controls

Personal Protective Equipment

Personal Protective Equipment ("PPE") for eyes, face, head, and extremities, including protective clothing, respiratory devices, and protective shields and barriers, must be used and maintained in a sanitary and satisfactory condition. PPE is required wherever hazards of processes, environment, chemical hazards, or mechanical irritants may be encountered and may cause injury or impairment in the function of any part of the body through absorption, inhalation, or physical contact. The General Manager and Extraction Manager must provide all PPE for staff and are responsible for ensuring the adequacy of the equipment, including proper maintenance, fit, and sanitation. All PPE is of safe design and construction for the work performed. The General Manager and Extraction Manager must assess the facility to determine if hazards are present or are likely to be present, which necessitate the use of PPE. If such hazards are present, PPE must be provided to protect from the hazards identified.

Employees are required to wear all PPE specified on the manufacturer's label when handling and using a hazardous material. The General Manager and Extraction Manager must provide detailed training to each employee who is required to use PPE. Each affected employee must demonstrate an understanding of the training and the ability to use PPE properly before being allowed to perform work requiring the use of PPE. When a manager has reason to believe that any affected employee who has already been trained does not have the understanding and skill required, the employee must be required to re-do the training. Every employee must acknowledge that they received and understand the required training through a written certification that contains the name of each employee trained, training date(s), and the area of training.

Processor Methods

The Company implemented a hydrocarbon, solvent-based extraction method in a spark-free and ventilated environment using professional grade, closed-loop extraction equipment. The processing area is isolated in a UL approved and certified fume-hood located in the extraction room. No open flame is present in the processing area. All solvents used during the extraction process are at least 99% pure and be properly stored consistent with OSHA regulations. All extraction equipment must be cleaned and maintained according to the manufacturer's recommendations.

Employees must comply with all applicable OSHA regulations pertaining to the use and storage of equipment and solvents used in the manufacturing process. Company uses the following methods to manufacture medical marijuana products:

- Hydrocarbon Solvent-based Extraction
- Ethanol Extraction
- Non-solvent extraction methods involving the mechanical separation of cannabinoids from plant material to produce medical marijuana extracts for use in the manufacture of medical marijuana products.
- Food grade glycerin and propylene glycol in the manufacture of medical marijuana products.
- Non-marijuana ingredients, only if they meet the following conditions:
    a. Obtained from licensed and regulated sources that comply with the requirements of federal and state laws and regulations.
    b. Nontoxic and safe for human consumption.
    c. Not prepared or stored in a private residence.

Extraction Process

The Company extracts oil from medical marijuana biomass to produce Butane Hash Oil (BTO) using an Ironfist Fabrication EX4-502 Extractor (“Extractor”) closed loop extraction system, which is supported by the Polyscience 6100T Chiller and Turbine and Kirkland EXT-420 Haskel Pumps. The Extractor is positioned inside a Kewaunee Scientific Corporation V67 Floor Mounted Fume Hood (“Fume Hood”), which is a ducted device that draws air from the extraction space and ventilates it out through the hood.

To begin the extraction process, medical marijuana material is placed in the Extractor and processed with cold butane. When the extraction process is finished, the crude oil is taken from the collection pot and transferred from inside the Extractor to an Across International, AT32e 3-

zone Vacuum Oven ("Oven") to purge the remaining solvents for 72-96 hours. The Oven is supported by Edward Rv8 and E2M30 Vacuum Pumps. To distill the oils, the BHO is warmed, mixed with ethanol, and filtered in an Across International SE13 Rotary Evaporator. Once the oil is distilled, terpenes are mixed in with the distilled oil on a Scilogex Magnetic Hotplate Stirrer, which is heated by a Benchmark H3760-H digital hotplate.

Solvents

Solvents must be at a minimum of ninety-nine percent purity and processed through a professional grade, closed-loop extraction system designed to recover solvents.

Reuse of Solvents

To ensure no solvent is ever leaked or spilled before, during, or after an extraction process, technicians must perform a comprehensive check of the closed loops systems by performing a dry run of the Extractor. Only when the system gauges show that there are no leaks, technicians must release solvents to begin the extraction process. Additionally, once the crude oil has been processed, technicians recover the used solvent into a collection tank or flask, so solvent can be re-used safely. In instances when some solvent is part of the waste product, employees must follow the Resource Conservation and Recovery Act of 1976 (RCRA) Subtitle C, which establishes proper disposal of hazardous waste.

Hydrocarbon Solvent-based Extraction

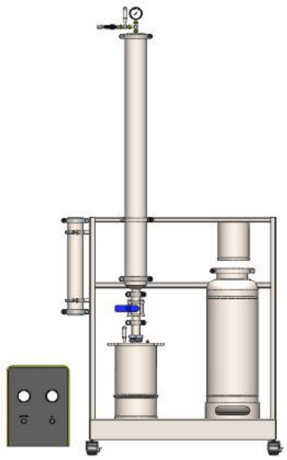
Hydrocarbon solvent-based extraction methods in a spark-free and properly ventilated environment, isolated from any open flame or ignition source, may only use the following solvents:

- Propane
- N-butane
- Isobutane
- Heptane

Ethanol

Ethanol extraction must be at a minimum of ninety-nine per cent purity to produce extracts for use in the manufacture of medical marijuana products.

Extraction Room Equipment



Ironfist Fabrication EX4-502 Extractor

Kewaunee V67 Floor Mounted Fume Hood

The following equipment is also used during the extraction process:

No.	NAME
1	Haskel Butane/Propane Extraction Pumps
2	Solventvap 1.3 Gallon/5L Rotary Evaporator
3	IOC to 4.2L IHP Chiller with Turbine Pump
4	AI 1.9 CU Ft. 3-Zone Vacuum Oven
5	Edward RV8 Vacuum Pump
6	Scilogex Bluespin Magnetic Hotplate Stirrer, LED Digital
7	H3760-H Digital Hotplate
8	1.6 CFM Dual-Stage Chemical-Resist Diaphragm Pump

Equipment Maintenance Log

The General Manager and Extraction Manager are responsible for scheduling, tracking, overseeing repairs and maintenance of the equipment, including tracking all maintenance activity in the Equipment Maintenance Log. All equipment must be sanitized, maintained, and calibrated in accordance with manufacturer recommendations. All equipment, including measurement devices, must be regularly calibrated, and checked to ensure accuracy and proper performance. Third-patty calibration services must be utilized annually at a minimum.

Inventory Management

General Manager

General Manager is the designated individual responsible for the following:

- Manage the Track and Trace System and ensure that each authorized user is trained and educated on inventory management systems prior to its access or use.
- Maintain an active list of users, which include a unique username and the employee's full

name.

- Report any loss of connectivity to the Track and Trace System.
- Monitor all compliance notifications from the Track and Trace System and timely resolve the issues detailed in the compliance notification.

Adequate Supply

The General Manager must ensure a consistent supply of medical marijuana is available to be sold to licensed dispensaries by:

- Not letting more than 30 days lapse between shipments totaling at least one lot of medical marijuana products to any licensed dispensary.
- Maintain an inventory of at least five hundred grams of medical marijuana extract that is ready for immediate use in the manufacture of marijuana products.

Track and Trace System

The state-approved Track and Trace System is METRC. All employees must ensure all the following facility events are recorded into the Track and Trace System:

1. Packaging of medical marijuana goods.
2. Sale and transfer of medical marijuana goods.
3. Transportation of medical marijuana goods to a licensee.
4. Receipt of medical marijuana goods.
5. Return of medical marijuana goods.
6. Destruction and disposal of medical marijuana goods.
7. Laboratory testing and results.
8. Any other activity as required pursuant to the Department.

All employees must ensure all the following information for each event is recorded and entered in the Track and Trace System:

1. Name and type of the medical marijuana goods.
2. Unique identifier of the medical marijuana goods.
3. Amount of the medical marijuana goods, by weight or count, and total wholesale cost of the medical marijuana goods, as applicable.
4. Date and time of the activity or transaction.
5. Name and license number of other licensees involved in the activity or transaction.

Software

Company has contracted with a third-party software provider to provide thorough inventory software and policies and procedures to ensure compliance with the requirements set forth by the Department's rules and regulations. The inventory policies and procedures include information regarding tracking, packaging, cultivation, processors, and dispensaries, and disposing of unusable marijuana as described below.

Storage

All finished medical marijuana in the process of production, distribution, transfer, or analysis must be stored in such a manner as to prevent diversion, theft or loss, and to maintain product efficacy and safety, in an indoor, enclosed facility. The Extraction Manager must implement a plan that ensures consistent, healthy, and safe storage. Company is only authorized to store plant material, medical marijuana extract, and medical marijuana product inventory on the premises in a designated, enclosed, locked area and accessible to only authorized employees.

Sales

All sales of medical marijuana or infused products must be recorded in the Track and Trace System and the state-approved tracking system METRC as regular wholesale sales to other licensed marijuana facilities.

Inventory Storage

All inventory not in storage must always be in the locked and secured vault.

Inventory Verification

Daily beginning physical inventory must be double-checked against the Track and Trace System and state-approved tracking system, METRC, to ensure that the two remain identical from the previous day's closing inventory balancing procedure. Daily ending physical inventory must be compared to the Track and Trace System. Any discrepancies must be recorded in the inventory control log and a damage, loss, and theft report must be completed and law enforcement must be notified immediately, if appropriate.

Weekly Inventory Report

The General Manager, Type 1, or Type 2 employees must prepare a weekly inventory report of medical marijuana at the facility. To do this, the authorized employee must:

1. Count all packaged and prepackaged products in the vault and storage areas. Verify quantities (or weight) match the Track and Trace System.
2. Record any inventory adjustments made in the Track and Trace System.

The inventory report must be delivered to the Chief Operating Officer for review and include the following information:

- The date of the inventory.
- The amount of medical marijuana on hand, which shall include:

a. The net weight of plant material.

b. The net weight and volume of medical marijuana extract.

c. The net weight and unit count of medical marijuana products prepared or packaged for sale to a dispensary.

d. The results from a testing laboratory indicating the amounts of delta-9-tetreahydrocannabinol and cannabidiol, if available; and

e. The registered strain or product names and batch or lot numbers of plant material, medical marijuana extract, and medical marijuana products.

- The amount of medical marijuana and medical marijuana products sold since previous weekly inventory, which shall include:

  a. The date of sale.

  b. The name of the dispensary to which the medical marijuana and medical marijuana products were sold.

  c. The lot number, strain or product name, and quantity sold.

- The date, quantity, and method of disposal of any plant material, medical marijuana extract, and medical marijuana products, if applicable.
- A summary of the inventory findings.
- The name, signature, and title of the Type 1 or Type 2 employees who conducted the inventory and oversaw the inventory.

Monthly Inventory Audit

The Company reconciles its physical inventory of medical marijuana goods with the records in its track and trace database at least once every 30 calendar days. If a Company employee discovers a discrepancy, the facility must conduct an audit and notify the Department of any reportable activity as appropriate. Company maintains an inventory log record that includes the date of each inventory process, a summary of inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory.

Annual Inventory Report

On an annual basis, the General Manager must conduct and oversee the physical, manual inventory of plant materials, extract, and other products on hand and compare the findings to an annual inventory report generated using the inventory tracking system. The report and findings must be submitted to the Chief Operations Officer for review. If any discrepancy is discovered outside of regular moisture loss and handling, the General Manager must report the findings to the Department.

Periodic and Continuous Audits

Complete a weekly audit on ancillary products, office supplies, bathroom supplies, and other basic facility supplies (cleaning products, paper towels, cups, etc.).

Discrepancies

The designated employee performing the inventory audit must notify the General Manager immediately with a detailed explanation of the discrepancy. If there is evidence pointing to diversion or theft, or if the reduction in inventory is not clearly due to documented causes, the reporting employee must include all supporting information to the General Manager.

1. The General Manager is responsible for documenting the discrepancy with the following required information:
   - A determination where the loss occurred and documented corrective action.
   - An indication if the reduction in the amount of medical or recreational marijuana in the inventory of the facility is due to suspected criminal activity by an employee.
   - If suspected criminal activity, the General Manager must report the employee to the Department and to the appropriate law enforcement agencies.
2. All documentation of inventory discrepancies must be maintained for a minimum of 5 years and provided to the Department, upon request.

Reconciliation

The Company maintains a redundant system that provides reconciliation of product units (beginning inventory, acquisitions, sales, disbursements, remediations, disposals, transfers, ending inventory). Reports and records of product units must include the source batch, amount, strain, lot, product run identification, license numbers, employee names and card numbers, and dates received and sold. Employees must track movement of all products in real-time and produce real-time reports. Product losses must be addressed by the General Manager, with a focus on identifying the cause, taking corrective action, and supporting documentation. Any suspected criminal activity must be reported to the Department and local authorities immediately.

1. For any changes to the inventory amounts in either the Track and Trace System or the state-approved tracking system METRC, the General Manager must be involved in reconciliations and the changes must be documented in the inventory event log. If the discrepancies are due to suspected diversion, then the local authorities and the Department must be contacted. All rules and regulations regarding diversion must be followed.
2. If a physically sold-out package quantity is not zero in either the Track and Trace System or the state-approved tracking system METRC, it must need to be reconciled.
3. Complete a physical search and recount to ensure all the units of the package are gone.
4. If the discrepancy remains, then carry out the following steps:
5. If diversion is suspected, contact the local authorities and the Department to receive further instruction.

6. Locate the package in the Track and Trace System, mark it to reconcile, enter the reason for the discrepancy, enter the actual quantity on hand and finalize the reconcile.
7. Return to the state-approved tracking system METRC, select the package RFID tag being reconciled, click Adjust to change the quantity, make the adjustment to the actual quantity, enter the reason for the adjustment, and click Submit.
8. With the Track and Trace System and state-tracking system inventory quantities in agreement with the physical inventory amount, the Closing Inventory Packages process may be followed if the package has been sold out.
9. The RFID tag tracking binder must be audited once each week for outstanding packages.

Troubleshooting

- In the event of inventory discrepancies concerning flower or infused products, a physical count of the inventory in question should be done. You may also need to inventory additional similar products to see if the error can be found.
- For discrepancies concerning custom-weighed flower, pull up the item in question in the Track and Trace System and look through each transaction made with that item. Check the pricing and quantity for each sale of that product to identify if quantities were sold for the correct amount.
- Also check the total quantity that was sold compared to the total that was originally accepted in the package. This can be done for both flower and infused products.
- Discrepancies concerning infused products are often a result of individual products being incorrectly scanned or entered int the cart at checkout. For discrepancies greater than +/- 1 unit for infused products, see a manager for assistance.
- Conducting a physical count of all inventory must allow you to see if any other products in that category are also off in count.

Weekly Inventory Sales Analysis

Every Monday, the current inventory must be downloaded to complete a weekly inventory sales analysis.

To complete a weekly inventory sales analysis, follow these steps:

1. Download the current inventory.
2. Sort the inventory file by vendor, category, and subcategory and provide the current unit inventory for each product unit to be examined for purchasing.

Monthly Inventory Sales Analysis

Every month, the 5-week unit sales numbers need to be updated.

1. Download the complete sales transaction list.

2. Sorting the transaction file by vendor, category, and subcategory must provide the historical unit sales for each product unit to be purchased.
3. Enter current inventory and historical sales values for each product unit to be purchased in the inventory purchasing analysis worksheet.
4. The formula in the worksheet must populate the average 2-week sales for each product unit, subtracting the current inventory, and indicating how many units need to be ordered.
5. Consult with the General Manager to review orders that need to be placed for the week.

Ordering Product

Using established online ordering systems is the most efficient way to order product.

1. If vendors are not on an online ordering system, consult the list of vendor contact information for email addresses and phone numbers to place orders.
2. Record the following items on the wholesale ordering page in the order tracking worksheet:
   - Product ordered
   - Name and license number of company
   - Amount due
   - Special orders
   - Net terms
3. When invoices are emailed, send the accounting department a copy of invoice, if they are not already included in the email.

Closing Inventory Packages

1. When a package is sold out, it needs to be closed in the Track and Trace System, state-approved tracking system METRC, and in the appropriate RFID tag tracking binder.
2. Log into the state-approved tracking system METRC and navigate to the Packages section.
3. Locate the package tag RFID being closed.
4. If the remaining quantity displayed is “0”, select the package and click on the Finish Package button.
5. In case of inventory discrepancies, immediately notify the General Manager.
6. Log into the Track and Trace System.
7. Search for the RFID tag number you want to close.
8. Select the actual items Inventory and a list must populate.
9. Review the list and select the correct package you are working on.

10. Information about this package must populate. Use the information on this screen to continue closing the package in the tag binder.
11. Look at the date the package was received in the Track and Trace System and use this date to locate the package tag in the RFID tag tracking binder.
12. After you have located the corresponding tag in the RFID tag tracking binder, fill in the information next to the tag.
13. You must need to record Total Revenue, final weight, and any other missing information in the tag binder.
14. After all the information has been recorded, click on the finish package at the top of the screen in the Track and Trace System.

Products

Product Registration

Each production registration application must include the proposed label. A separate registration must be submitted to the Department for each package size and dose of a particular strain or product before it may be offered for sale. A variation of ingredients is considered a new product and requires a separate product registration and product identifier.

Product Identifier

Before any medical marijuana product may be sold to a dispensary, the form for each dose and packaged quantity of that product must be registered with the department and assigned a product identifier. The following information must be submitted to the Department for each form and dose of each medical marijuana product:

- Entity name and license number.
- Name of product
- Product description, administration method, and image.
- Product dose.
- Days supply of the product for each product package that must be available.
- Product ingredients
- Proof the product has been registered with the Department.
- Required fee.
- Any other additional items, as determined by the Department.

Permitted Products

All products must be approved by the Department. Only the following marijuana products, forms, and routes of administration are permitted:

- Oil, tincture, capsule, or edible form for oral administration.
- Metered oil or solid preparation for vaporization.
- Patches for transdermal administration or lotions, creams, or ointments for topical administration.
- Plant material for administration with the use of vaporizing devices.

List of Products

Currently, the Extraction Manager is only permitted to process and produce the following medical marijuana products:

- Distillate
- Wax
- Shatter
- Badder
- Ambrosia
- Edible Pretzel Bites

Prohibited Products

The following medical marijuana products are strictly prohibited:

- Any product bearing any resemblance to a cartoon or fictional character whose target audience is children or youth, or pop culture figure.
- Any product bearing any reasonable resemblance to a product available for consumption as a commercially available candy.
- Any product that resembles, by any means, another object commonly recognized as appealing to, or intended for use by, children.
- Any product that bears the likeness or contains characteristics of a realistic or fictional human, animal, or fruit, including artistic, caricature, or cartoon renderings.
- Any medical marijuana product that otherwise targets persons under the age of eighteen.

Vaporization

The following restrictions are in place for vaporizing devices and products:

- May not be used to vaporize the resin contained within, or an extract of, medical marijuana.
- Must not be capable of being heated to temperatures at which medical marijuana plant

material must burn.

- Characterizing flavors, except those intended to mimic marijuana strains, are prohibited from all products intended for use in the vaporization.
- Vaporization is not an authorized method of administration for registered patients under the age of eighteen.

Extraction Preparation

Extraction Manager and Staff have a responsibility to extract marijuana in a safe and sanitary environment. To effectively produce marijuana products, all employees must follow some basic rules in the Extraction Room.

Arriving to Work

- Arrive early to secure your outfit.
- Ensure you have a laundered uniform, coat, apron, pants, hairnet, and non-slip shoes on.
- Secure any loose hair.
- Remove any rings and watches.
- Be ready and prepared to start work on time.

Working

- Gloves must be changed every two (2) hours or as needed.
- Workstations must be sanitized and ready.
- Never allow your skin to contact food or ingredients.
- No cell phones, open beverages, and snacks in the Kitchen. Only closed-lid, spill-proof thermoses are allowed.
- No cloths allowed on workstations or on the ground.
- Workstations must be sanitized and ready for next use.

Room Preparation Procedures

1. Inspect areas in the fume hood, storage, and refrigeration rooms to ensure proper sanitation and cleanliness.
2. Ensure all tables and surfaces are fully sanitized and decluttered.
3. Confirm the room is stocked with at least one (1) full 20-ounce spray bottle of 99% pure isopropyl alcohol, at least five (5) full rolls of paper towels, and one (1) box of gloves.
4. Check and ensure the monitor is functioning and set to the accurate detection level (~15%).
5. Check fans to confirm working properly and set to the correct setting.
6. Inspect the parchment paper and prepare enough squares with raised edges.

Pull Vacuum

1. Ensure there are no leaks or loose fastenings, and proper pressure is set.

Chiller

2. Check and make sure the temperature dial is set to -20°C. Monitor the chiller to ensure the temperature does not rise above 0° at any point during or after running any machinery.

Material preparation procedures

1. Identify the type of medical marijuana to use (frozen, trim, or cured).
2. Select the material and verify the product contains the following: labelled, tested, and not expired.
3. Verify that all the medical marijuana is properly labelled and tested.
4. Inspect the packing socks for holes and cleanliness.
5. Load 450-500 grams of the sugar trim or flower in 90-micron filter bags (5” x 18”).
6. Place the filter bags, filled with the trim or flower, in the commercial grade walk in freezer, which is set to 10 degrees. Leave the trim or flower in the freezer for 24 hours.

Closed Loop BHO System

Inspection Procedures

1. Inspect the ovens to ensure it is clean inside and out. Make sure the temperature is set to -10 C and turn on the compressor.
2. Ensure all surfaces and individual parts of machine are sterilized from the night before and assembled appropriately.

Closed Loop BHO System Procedures

1. Check and ensure that only tanks containing ultra-refined butane gas and 99+% pure ethanol are connected to the machine.
2. Deploy Butane and monitor the tank’s dial and valves.
3. Place one (1) filter bag in the stainless-steel cylindrical column.
4. Place the column in the top of the unit, which is clamped and sealed shut.
5. Assemble the collection pot, and ensure it is properly sealed and is airtight. Check to make sure the F and D Lines are securely attached, and all valves are closed.
6. Before activating the unit, check and ensure the closed-loop system is airtight by attaching the small air compressor pump to the unit and turning it on. When all gauges read -30psi, monitor the system for several minutes to ensure it is airtight and functioning properly.

7. Once you confirm the unit is airtight, connect the chilled butane solvent tank and the steel hose to the top of the steel column.
8. Set the chiller to -10 degrees C.
9. Release and control the flow of Butane with the valves and control panel.
10. After releasing the Butane, monitor the system and allow the Butane to soak the material for several minutes.
11. Once the solvent finishes dripping in the column, attach hot water lines to the bottom of the collection pot.
12. After each soaking period, turn on the water valves and haskel pump attached to the equipment.
13. Monitor the water flow and pumping system for approximately 20 minutes as the Butane is recovered and recycled. Once solvent is recovered, turn off the Haskel pump, air compressor, and hot water valve. Typically, 83-85% of the solvent is usually recovered.
14. Once the solvent is recovered in the recovery tank, remove the used filter bag from the column and place the used filter bags in the disposal bin according to waste and disposal procedures.
15. Remove the collection pot and begin pouring the crude oil into parchment paper.
16. Carefully inspect the crude oil output and ensure it is clean and free of debris.
17. Carefully place parchment paper under the output valve of the closed-loop system and ensure that crude oil is evenly distributed across the surface of the paper. Each piece of parchment paper holds one (1) large slab of crude oil.
18. Carefully assess the quality of the batch of crude oil and determine if it must be used for distillate, wax, shatter, or ambrosia.
19. Transfer the parchment paper containing the crude oil slabs to the ovens.
20. Set the correct temperature on the oven, according to the final form of concentrate (95-115 degrees F):

Ovens

21. Recheck the valves to ensure adequately set. Treat the specific form of concentrate overnight with heat and pressure (16 hours).

Distillate Procedures

To make Distillate, employees must start with the finished BHO just produced. Typically, once the BHO is processed and distilled into distillate, the yield is approximately 60%.

Warm filtering

For batches being turned into distillate, crude oil must undergo both winterization and distillation treatment.

1. Divide crude oil into 150 grams sections and mix it with 1,500 milliliters of 200-proof ethanol (10:1 ratio) in a 2,000-milliliter jar.
2. Heat the mixture on a warming tray (120 degrees F) for 30 minutes.
3. While the mixture is warming, place filters inside the glass Buchner funnel, one “lab” filter, and two coffee-type filters on top of the lab filter.
4. Pour the warm mixture into the funnel and in the 2,000-milliliter collection flask. Repeat for each of the 150-gram crude oil sections mixed with 1,500 milliliters of ethanol.
5. For any portion of the BHO material left over weighing less than 150 grams, mix with a 10:1 ratio of ethanol.

Winterization

6. Place all the collection jars in the cryogenic freezer (set to -80 F).
7. Leave in the freezer for 18 hours to allow the remaining fats and lipids to rise to the top.

Cold Filtering

8. After 18 hours in the freezer, remove the jars and immediately filter the mixture by applying the prior filtering process and cold filter the mixture and place it back in the cryogenic freezer for a second time (18 hours).

RotoVap

9. Remove ethanol by using a Rotovap to evaporate and recycle 85% of the ethanol used, approximately 8.5 milliliters for every one (1) gram of crude oil. Pour the mixture into a 10 liter flask connected to the RotoVap unit.
10. Once the appropriate temperature is reached, activate the RotoVap, which rotates the 10-liter flask.
11. Once the appropriate temperature is reached, activate the RotoVap, which rotates the 10 liter flask.

RotoVape Unit

First Fraction

12. Attach and seal a 5-liter flask to the fractional distillation unit.
13. Set the mantle temperature to 160 degrees F and heat the 5-liter flask for 20 minutes or until it reaches desired temperature.
14. Activate the magnetic stirrer and continually stir to reach uniformed temperature and until the final fraction is pulled.
15. Closely monitor the fractions of output and separate it according to potency, look, and grade.
16. Separate and transfer the Head Fraction into its own mason jar. Head Fraction is the most potent grade of distillate output.
17. Label the mason jar with the batch number, date, and amount.

Second Fraction

18. Replace the machine with a clean, fresh 5-millimeter flask.

19. Increase the heat in the mantle to 200 degrees F.

20. Once the mixture reaches correct temperature, vaporize and process the mixture through the unit, just like the first fraction process.

21. Separate and transfer the Kitchen Fraction into its own mason jar. Kitchen Fraction is the least potent grade of distillate output.

22. Determine final end use for batch of distillate, and then proceed with blending, transfer and/or storage. Prepare testing samples and label any material transferred to storage with "not-ready-for-sale."

23. Determine final end use for batch of distillate, and then proceed with blending, transfer and/or storage.

24. Prepare testing samples and label any material transferred to storage with "not-ready-for-sale."

25. Label the container with the batch number, date, and amount.

Third Fraction

26. Increase the temperature of the mantle to 250 degrees F. Repeat the fraction process to pull the third fraction.

27. Label the container with the batch number, date, and amount.

Cleaning

28. Fill the 5-liter flask with 1,000 milliliters of ethanol and warm the 150 degrees F. The ethanol must vaporize, rise through the column, and purify the system as it passes through.

29. Dispose the leftover collected waste and depose of it according to disposal and waste procedures.

Packaging Distillate

1. Gather information on amount ready for packaging.

2. Asses the number of containers and inserts needed for finished packaged units and bulk case boxes.

3. Collect the required number of packaging, labels, plastic inserts, carts, boxes, and/or cases.

4. Collect a sanitized syringe for each type of distillate intended for packaging.

5. Request or print the labels.

6. Verify all the information is correct on the labels.

7. Set up a workstation and count the number of bags, syringes, boxes, cases, and labels to ensure it is accurate.
8. Draw distillate from the jar with the syringe until it reaches desired amount (1000 mg, 500 mgs, or 300 mgs).
9. Transfer the distillate from the syringe into the vape cart until it reaches 1,000 mg, 500 mg, or 300 mg, based on the size of vape cart.
10. Take the filled vape cart and place it in the designated plastic inserts.
11. Transfer the plastic insert containing the vape cart.
12. Transfer the vape cart into the plastic insert.
13. Place the plastic insert containing the vape cart into the designated plastic box and close it.
14. Stick the label on the box.
15. Repeat steps 8-14 until the entire batch is complete.
16. Upon completing the batch, count and confirm the totals. If the total amount of packages do not match the batch total, immediately address with your manager.
17. Log the batch is the Transfer Sheet, upon transferring the batch to the Inventory Manager.
18. Once the totals are confirmed, the Inventory Manager must seal each case and affix the appropriate tamper labels, if needed.

Vape Cartridges

Procedure

1. Take the raw distillate/oil from the second fraction and warm it to a consistency for easier pouring.
2. Pour the distillate/oil into 100 grams weighed flasks. Flasks remain on the warming plate with the magnetic stirrer underneath.
3. Heat the distillate oil to 140 degrees F and activate the stirrer.
4. Add 15-20% (by weight) terpenes to the distillate oil, based on the flavor being created.
5. Seal the distillate in the mason jar.
6. Label the jar with the batch number, date, and amount.

Wax & Shatter

Procedures

After winterization is complete, prepare the output oil to be distilled and stripped of any lingering ethanol.

1. Set the oven to XX degrees and set the pressure to XX pounds.
2. Carefully place slabs of crude oil on parchment paper directly in the oven. Avoid any spillage.
3. Monitor the temperature and pressure levels.
4. Treat in the oven for 72 hours to remove any residual solvents.
5. Remove refined slabs of crude oil and parchment paper from the oven.
6. Separate shatter from parchment paper and carve out portions for testing, packaging, and sales.
7. Label the container(s) with the batch number, date, and amount.

Packaging shatter

1. Gather information on amount ready for packaging.
2. Asses the number and types of containers and packaging needed for finished packaged units and bulk case boxes.
3. Collect the required number of envelopes, labels, boxes, and/or cases.
4. Request or print the labels.
5. Verify all the information is correct on the labels.
6. Set up a workstation and count the number of packaging, labels, boxes, and/or cases.
7. Divide the shatter on the parchment paper into individual one (1) gram units.
8. Transfer each individual unit into designated envelope.
9. Stick the label and designated sticker on the envelope.
10. Repeat steps 7-9 until the batch is complete.
11. Upon completing the batch, count and confirm the totals. If the total amount of packages do not match the batch total, immediately address with your manager.
12. Log the batch is the Transfer Sheet, upon transferring the batch to the Inventory Manager.
13. Once the totals are confirmed, the Inventory Manager must seal each case and affix the appropriate tamper labels, if needed.

Badder

Procedures

1. Remove purged slabs from the oven and place it on a hotplate set to 50 degrees C.

2. With a sterile stirring utensil, begin whipping the slab for approximately 45 minutes. The final product is ready when it has a soft taffy, batter-like consistency.
3. Begin separating the batter into mason jars (.5 and 1.0 grams).
4. Label the jar(s) with the batch number, date, and amount.

Packaging procedures

1. Gather information on amount ready for packaging.
2. Asses the number of containers needed for finished packaged units and bulk case boxes.
3. Collect the required number of jars, labels, boxes, and/or cases.
4. Request or print the labels.
5. Verify all the information is correct on the labels.
6. Set up a workstation and count the number of packaging, labels, boxes, and/or cases.
7. Chop the badder or wax into individual gram units. Each amount must be one (1) gram in weight.
8. Transfer the gram units into the designated jars.
9. Stick the label on the designated jar.
10. Repeat steps 7-9 until the batch is complete.
11. Upon completing the batch, count and confirm the totals. If the total amount of packages do not match the batch total, immediately address with your manager.
12. Log the batch is the Transfer Sheet, upon transferring the batch to the Inventory Manager.
13. Once the totals are confirmed, the Inventory Manager must seal each case and affix the appropriate tamper labels, if needed.

Ambrosia

Procedures

1. Pour the prepared crude oil into XX milliliter mason jars.
2. Allow the crude oil to sit for at least five (5) minutes, so it can take shape.
3. Seal the mason jar containing the crude oil and ensure it is airtight.
4. Set the oven temperature to 77 degrees Fahrenheit.
5. Place the mason jar(s) in the oven and store for two (2) to three (3) weeks.

6. Each day, review and asses the THCA diamonds to ensure the disc-like diamonds begin and continue separating from the bottom of the mason jar(s).
7. After the two (2) to three (3) week period, pour the terpenes into separate mason jars. Leave the leftover THCA in the original mason jar(s) and allow the terpenes and THCA to settle.
8. Blend the terpenes back into the original mason jar(s) containing the THCA. The consistency must be 30% terpenes and 70% TCHA diamonds.
9. Seal and label the jars with the batch number, date, and amount.

Packaging ambrosia

1. Gather information on amount ready for packaging.
2. Asses the number of containers and inserts needed for finished packaged units and bulk case boxes.
3. Collect the required number of packaging, labels, jars, boxes, and/or cases.
4. Request or print the labels.
5. Verify all the information is correct on the labels.
6. Set up a workstation and count the number of jars, boxes, cases, and labels to ensure it is accurate.
7. Transfer the BHO-THCA crystals liquid by pouring it into a smaller jar.
8. Weigh the smaller jar containing the BHO-THCA crystals.
9. Transfer the Terpenes by pouring it into the smaller jar containing the BHO-THCA crystals.
10. Weigh the total weight of the BHO-THCA crystals and Terpenes in the smaller jar.
11. Ensure the total weight is a 70/30 mix. (70% BHO-THCA crystals and 30% Terpenes).
12. Repeat steps 7-11 until the entire batch is complete.
13. Upon completing the batch, count and confirm the totals. If the total amount of packages do not match the batch total, immediately address with your manager.
14. Log the batch is the Transfer Sheet, upon transferring the batch to the Inventory Manager.
15. Once the totals are confirmed, the Inventory Manager must seal each case and affix the appropriate tamper labels, if needed.

Waste

Procedures

Waste is considered any marijuana or non-marijuana discarded during the production, transport, or package process, including waste discarded because of spillage, excess, or contamination.

1. Identify and contain all the trim and flower processed in the closed-loop system by cleaning out the sock and other parts of the machine.
2. Once waste is identified and categorized, inform the Extraction Manager.
3. Write and log the waste and event on the appropriate tracker.
4. Wrap and secure the waste in a freezer bag(s) or containers.
5. Write the date, amount, batch, and type of waste on the bag or container with a permanent, black marker.

Securing waste

1. Once waste is identified and categorized, inform the General Manager.
2. Write and log the waste and event on the appropriate tracker.
3. Wrap and secure the waste in freezer bag(s).
4. Write the date, amount, batch, and type of waste on the bag(s) with a permanent, black marker.
5. Dispose the bag of waste in the designated bin.

Extraction Room Cleaning

Handwashing

Each employee engaged in the production of edibles, infused marijuana, or any other medical marijuana products must wash their hands in the following manner:

1. Rinse hands and any exposed portion of your arms under warm water for at least 10 seconds.
2. Apply cleaning solution on hands and any exposed portion of your arms.
3. Rub the cleaning solution vigorously into your hands and arms for at least 20 seconds.
4. Create friction on the surface of your hands, arms, fingertips, and between the fingers.
5. Ensure you removed all dirt, soil, or other debris from under the fingernails.
6. Thoroughly rinse your hands and arms under clean and warm water for at least 15 seconds.
7. Immediately dry your hands with an unused, dry paper towel

Floors

At least three (3) times per week, the Extraction Manager and Staff must:

1. Sweep floors with a broom.

2. Dispose of the collected debris.
3. Fill mop bucket with mild bleach cleaning solutions and warm water.
4. With a wet mop, wipe the floors thoroughly to remove dirt and grind.

Walls, tables, and fixtures

At least three (3) times per week, the Facility Janitor must:

1. Saturate a commercial squeegee with mild bleach cleaning solution and warm water.
2. With the squeegee, scrub all walls, tables, and fixtures.
3. Rinse with warm water.
4. With bleachable towels and rag, wipe all the walls, tables, and fixtures.

Equipment

1. Soak all equipment and tools for at least 12 hours in a mild bleach solution.
2. Prepare an area for the equipment and tools to dry.
3. After 12 hours soaking, remove and place the equipment and tools on the prepared, clean surface.
4. Track all cleaning on the Cleaning Log.

Kitchen Room Preparation

Room Preparation

1. Inspect areas in the Kitchen, storage, and refrigeration rooms to ensure proper sanitation and cleanliness.
2. Ensure all tables and surfaces are fully sanitized and decluttered.
3. Make sure equipment and utensils are sanitized and ready for use.
4. Confirm all slabs, sheets, paper, plastics, cabinets, and racks are sanitized and ready for use.
5. Inspect the fans, ovens, and other kitchen equipment to confirm working properly and set to the correct setting.
6. Verify ingredients are labeled and ready for use.
7. Inspect the parchment paper and prepare sufficient squares with raised edges.

Kitchen Production Log

All work completed in the Kitchen must be recorded in the Kitchen Production Log, which must include at least the following information:

- Start time
- End time
- Description of preparation and work completed.
- List of ingredients used. Indicate all ingredients that contain allergens.

Pretzel Bites

Ingredients

The ingredients below will yield 982 units (or 98.2, 10-pack units)

- 385g Water
- 385g Glucose
- 2,319g Sugar
- 1,546g Heavy Cream
- 385g Butter
- 16g Vanilla
- 18.5g Mold Inhibitor
- 1g Salt
- 1,964 Pretzels
- 9.8g Distillate

Pretzel Bites Procedure

1. Ensure that you adhere to the CCB hygiene standards as well as food protection procedures regarding cleanliness and hygiene. Wear proper PPE such as gloves, hairnets, shoe covers, and designated clean kitchen uniforms always.
2. Wash hands with soap and hot water before beginning, ensuring that any exposed parts of arms are sanitized. Hands are to be washed before and after handling any product as well as in between uses of different products and/or ingredients. Gloves are to be always worn, being changed in between uses of various products to avoid any chance of cross contamination.
3. Verify the sanitizer concentration. Clean, sanitize, and disinfect all work surfaces before use. Repeat this procedure in between use of different sproduct and at the end of the working shift. Wait until all surfaces are completely dry before utilizing.
4. Gather the necessary utensils needed for this recipe and ensure that items are correctly sanitized to the appropriate standards.

5. Using a small glass container, melt butter over low heat. Once the butter has melted, infuse with the designated distillate, and mix well until the distillate is completely homogenized. Once concentrated cannabis has been used, the corresponding Metrc RFID tag is to stay along with all products containing that distillate (this includes at all workstations that are working with infused product, and any storage space that contains this PR# of concentrated cannabis). Amounts of product are to be recorded, tracked, and reviewed if/and when necessary.
6. In a large, nonstick pot, mix the sugar, water, and glucose
7. Heat on stove until slightly clear before putting to a full boil on medium heat
8. Cook sugar until it becomes a light amber color
9. Next, add the infused butter mixture, careful to not stir immediately. Let the butter dissolve then slowly mix with a high heat spatula. Be careful of the steam; it will increase
10. Next, add cream and vanilla. It is better to have cream slightly warm, so it won't scorch and rise in steam
11. Lastly, add the salt and cook to desired consistency
12. Cook caramel to 116C (240F) – 118C (244F)
13. When reached desired temperature, turn off heat, remove from heating element, let bubbles calm down before pouring
14. Pour the mixture into a prepped pan and let set overnight.
15. In the meantime, while product is setting, disassemble any product equipment, gather utensils, and use the three-compartment sink to wash, rinse, and sanitize.
16. After the caramel has set, cut into units weighing 4g each. These 4g units of infused caramel will then be squished between 2 pretzels and dipped in coating chocolate.
17. After product has been completed, again, disassemble any product equipment, gather utensils, and use the three-compartment sink to wash, rinse, and sanitize.
18. This product is to be served as 10 individual pieces (in a 10pk), each piece containing 10mg THC
19. Product will be quarantined and sent for appropriate testing. Upon a passing certificate of analysis, we will be ready to package and label product accordingly.
20. Product will be packaged into clear demarked packaging. Inserts hold 10 units that are clearly displayed in packaging that specifies each piece is 10mg of THC. Product storage is to be clearly and correctly labeled with compliance labels and the Metrc tag.

Packaging

1. Gather information on the size and number of pieces per batch.

2. Asses the number of bags and inserts needed for finished packaged units and bulk case boxes.
3. Collect/request the required number of packaging, plastic inserts, boxes, and cases.
4. Request or print the labels.
5. Verify all the information is correct on the labels.
6. Set up a workstation and count the number of bags, boxes, cases, and labels to ensure it is accurate.
7. Place the correct label insert in the front of the package.
8. Place the finished product one (1) at a time in each plastic insert within each cavity. 10 pieces go into the 10-pack and 3 pieces go into the 3-pack.
9. Once finished filling the plastic insert with finished product, close the clamshell with the tabs at the end of the insert.
10. Place the filled inserts into the package with the crease side down and tab facing up toward the opening.
11. Close the seal/zipper clasp and place it in the designated area for heat sealing.

Heat Sealing

1. Set the sealing device to the correct temperature.
2. Using the heat-sealing device, take the closed package and run it along the heat seal line to close and seal each tab above the zipper.
3. After it is sealed, place each unit directly into the designated carton or case.
4. Upon completing the batch, count and confirm the totals. If the total amount of packages do not match the batch total, immediately address with your manager.
5. Log the batch is the Transfer Sheet, upon transferring the batch to the Inventory Manager.
6. Once the totals are confirmed, the Inventory Manager will seal each case and affix the appropriate tamper labels, if needed.

Hazelnut Truffle Recipe

Ingredients

The following ingredients yield 107 units, or 10.7, 10-pk units.

- 30g Butter
- 180g Heavy Cream
- 13g Inverted Sugar Syrup

- 160.5g Coating Chocolate
- 150g Milk Chocolate
- 122g Hazelnut Praline Paste
- 200g Hazelnut Spread
- 8g MCT Oil
- 170g Hazelnut Pieces
- 107 Chocolate Shells
- 1070mg (or 1.07g) Distillate

Hazelnut Truffle Procedure

1. Ensure that you adhere to the CCB hygiene standards as well as food protection procedures regarding cleanliness and hygiene. Wear proper PPE such as gloves, hairnets, shoe covers, and designated clean kitchen uniforms always.
2. Wash hands with soap and hot water before beginning, ensuring that any exposed parts of arms are sanitized. Hands are to be washed before and after handling any product as well as in between uses of different products and/or ingredients. Gloves are to be always worn, being changed in between uses of various products to avoid any chance of cross contamination.
3. Verify the sanitizer concentration. Clean, sanitize, and disinfect all work surfaces before use. Repeat this procedure in between use of different product and at the end of the working shift. Wait until all surfaces are completely dry before utilizing.
4. Gather the necessary utensils needed for this recipe and ensure that items are correctly sanitized to the appropriate standards.
5. Begin by melting butter and MCT oil while it's still slightly warm and mix the two ingredients together.
6. Infuse the butter and MCT oil with distillate.
7. Once concentrated cannabis has been used, the corresponding METRC RFID tag is to stay along with all products containing that distillate (this includes at all workstations that are working with infused product, and any storage space that contains this PR# of concentrated cannabis). Amounts of product is to be recorded, tracked, and reviewed if/and when necessary.
8. Scald heavy cream and add into the infused mixture.
9. Using a water bath, melt the milk chocolate and add into the infused mixture.
10. Using a mixer, mix half of the hazelnut spread and half of the infused mixture on low speed for approximately 2 minutes.

11. Add in the hazelnut praline paste, the remaining hazelnut spread, and the remaining infused mixture. Mix well on low speed for approximately 5 minutes.
12. Scrape the sides of the bowl and continue mixing on low speed for an additional 2 minutes.
13. Incorporate the inverted sugar, scrape the sides of the bowl once more, and mix for 3 minutes.
14. Fill a piping bag with the infused mixture and fill each truffle shell with 6g of the infused filling.
15. Seal the truffle using coating chocolate and garnish with hazelnut pieces.
16. Product will be quarantined and sent for appropriate testing. Upon a passing certificate of analysis, we will be ready to package and label product accordingly.
17. Product will be packaged into clear demarked packaging. Inserts hold 10 units that are clearly displayed in packaging that specifies each piece is 10mg of THC. Product storage is to be clearly and correctly labeled with compliance labels and the Metrc tag.
18. Disassemble any product equipment, gather utensils, and use the three-compartment sink to wash, rinse, and sanitize.

Packaging

1. Gather information on the size and number of pieces per batch.
2. Asses the number of bags and inserts needed for finished packaged units and bulk case boxes.
3. Collect/request the required number of packaging, plastic inserts, boxes, and cases.
4. Request or print the labels.
5. Verify all the information is correct on the labels.
6. Set up a workstation and count the number of bags, boxes, cases, and labels to ensure it is accurate.
7. Place the correct label insert in the front of the package.
8. Place the finished product one (1) at a time in each plastic insert within each cavity. 10 pieces go into the 10-pack and 3 pieces go into the 3-pack.
9. Once finished filling the plastic insert with finished product, close the clamshell with the tabs at the end of the insert.
10. Place the filled inserts into the package with the crease side down and tab facing up toward the opening.
11. Close the package and place it in the designated area for sealing.

Fruit Bites Recipe

Ingredients

The following ingredients yield 530 units, or 53, 10-pack units.

- 1,000g Fruit Puree
- 1,124g Granulated Sugar
- 24g Apple Pectin
- 24g Dextrose Powder
- 232g Glucose
- 18g Tartaric Acid Solution
- 20g Citric Acid
- 100g Granulated Sugar (For Coating)
- 5,300mg (or 5.3g) Distillate

Fruit Bites Recipe Procedure

1. Ensure that you adhere to the CCB hygiene standards as well as food protection procedures regarding cleanliness and hygiene. Wear proper PPE such as gloves, hairnets, shoe covers, and designated clean kitchen uniforms always.
2. Wash hands with soap and hot water before beginning, ensuring that any exposed parts of arms are sanitized. Hands are to be washed before and after handling any product as well as in between uses of different products and/or ingredients. Gloves are to be always worn, being changed in between uses of various products to avoid any chance of cross contamination.
3. Verify the sanitizer concentration. Clean, sanitize, and disinfect all work surfaces before use. Repeat this procedure in between use of different product and at the end of the working shift. Wait until all surfaces are completely dry before utilizing.
4. Gather the necessary utensils needed for this recipe and ensure that items are correctly sanitized to the appropriate standards.
5. Begin by using 124g of granulated sugar and mix with apple pectin and dextrose powder.
6. Warm up fruit puree and when the temperature reaches 70˚C add in the sugar/apple pectin/dextrose powder mixture.
7. When the mix boils add in the glucose and the remaining 1,000g of granulated sugar until the temperature has reached 106 ˚C.
8. Remove from heat and infuse with distillate. Once concentrated cannabis has been used, the corresponding METRC RFID tag is to stay along with all products containing that distillate (this includes at all workstations that are working with infused product, and any storage space that contains this PR# of concentrated cannabis). Amounts of product is to be recorded, tracked, and reviewed if/and when necessary.
9. Portion the infused mixture into a 168 cavity (3.5g/unit) silicone molds and let them sit

overnight.

10. Mix 100g of granulated sugar and 20g of citric acid together to create a sweet and sour sugar coating.
11. In the meantime, while product is setting, disassemble any product equipment, gather utensils, and use the three-compartment sink to wash, rinse, and sanitize.
12. Demold the fruit bites and coat them in the sweet and sour sugar.
13. Product will be quarantined and sent for appropriate testing. Upon a passing certificate of analysis, we will be ready to package and label product accordingly.
14. Product will be packaged into clear demarked packaging. Inserts hold 10 units that are clearly displayed in packaging that specifies each piece is 10mg of THC. Product storage is to be clearly and correctly labeled with compliance labels and the METRC tag.

Packaging

1. Gather information on the size and number of pieces per batch.
2. Asses the number of bags and inserts needed for finished packaged units and bulk case boxes.
3. Collect/request the required number of packaging, plastic inserts, boxes, and cases.
4. Request or print the labels.
5. Verify all the information is correct on the labels.
6. Set up a workstation and count the number of bags, boxes, cases, and labels to ensure it is accurate.
7. Place the correct label insert in the front of the package.
8. Place the finished product one (1) at a time in each plastic insert within each cavity. 10 pieces go into the 10-pack and 3 pieces go into the 3-pack.
9. Once finished filling the plastic insert with finished product, close the clamshell with the tabs at the end of the insert.
10. Place the filled inserts into the package with the crease side down and tab facing up toward the opening.
11. Close the package and place it in the designated area for sealing.

Krispy Bites Recipe

Ingredients

The following ingredients yield 83 units, or 8.3, 10-pack units.

- 80g Butter

- 450g Mini Marshmallows
- 138g Dry Cereal
- Coating Chocolate
- 1g Salt
- 3g Vanilla Paste
- 2g Coating Chocolate
- 5g Cooking Spray
- 830mg (or 8.3g) Distillate

Krispy Bites Procedure

1. Ensure that you adhere to the CCB hygiene standards as well as food protection procedures regarding cleanliness and hygiene. Wear proper PPE such as gloves, hairnets, shoe covers, and designated clean kitchen uniforms always.
2. Wash hands with soap and hot water before beginning, ensuring that any exposed parts of arms are sanitized. Hands are to be washed before and after handling any product as well as in between uses of different products and/or ingredients. Gloves are to be always worn, being changed in between uses of various products to avoid any chance of cross contamination.
3. Verify the sanitizer concentration. Clean, sanitize, and disinfect all work surfaces before use. Repeat this procedure in between use of different product and at the end of the working shift. Wait until all surfaces are completely dry before utilizing.
4. Gather the necessary utensils needed for this recipe and ensure that items are correctly sanitized to the appropriate standards.
5. Begin food preparation by spraying a full sheet tray lightly with cooking spray and set aside.
6. Use a large nonstick pot and melt butter over low heat. Once the butter has melted, infuse with the designated distillate, and mix well until the distillate is completely homogenized. Once concentrated cannabis has been used, the corresponding METRC RFID tag is to stay along with all products containing that distillate (this includes at all workstations that are working with infused product, and any storage space that contains this PR# of concentrated cannabis). Amounts of product is to be recorded, tracked, and reviewed if/and when necessary.
7. Add mini marshmallows in stages, stirring consistently.
8. Once the marshmallows have melted, remove the mixture from the heat and stir in dry cereal, salt, and vanilla paste ensuring everything is evenly coated.
9. Pour the mixture into a prepped pan and press out evenly, allow product to completely cool.
10. Cut the cooled product into units weighing 8g. This product is to be served as 10 individual pieces.

11. Garnish with coating chocolate and let set.
12. In the meantime, while product is setting, disassemble any product equipment, gather utensils, and use the three-compartment sink to wash, rinse, and sanitize.
13. Product will be quarantined and sent for appropriate testing. Upon a passing certificate of analysis, we will be ready to package and label product accordingly.
14. Product will be packaged into clear demarked packaging. Inserts hold 10 units that are clearly displayed in packaging that specifies each piece is 10mg of THC. Product storage is to be clearly and correctly labeled with compliance labels and the METRC tag.

Packaging

1. Gather information on the size and number of pieces per batch.
2. Asses the number of bags and inserts needed for finished packaged units and bulk case boxes.
3. Collect/request the required number of packaging, plastic inserts, boxes, and cases.
4. Request or print the labels.
5. Verify all the information is correct on the labels.
6. Set up a workstation and count the number of bags, boxes, cases, and labels to ensure it is accurate.
7. Place the correct label insert in the front of the package.
8. Place the finished product one (1) at a time in each plastic insert within each cavity. 10 pieces go into the 10-pack and 3 pieces go into the 3-pack.
9. Once finished filling the plastic insert with finished product, close the clamshell with the tabs at the end of the insert.
10. Place the filled inserts into the package with the crease side down and tab facing up toward the opening.
11. Close the package and place it in the designated area for sealing.

Cookies and Cream Bites

Ingredients

The following ingredients yield 1120 units, or 112, 10-pack units.

- 5,000g White Chocolate
- 1,500g Cocoa Butter
- 220g Cookies & Cream Crumbs
- 11,200mg (or 11.2g) Distillate

Cookies and Cream Procedure

1. Ensure that you adhere to the CCB hygiene standards as well as food protection procedures regarding cleanliness and hygiene. Wear proper PPE such as gloves, hairnets, shoe covers, and designated clean kitchen uniforms always.
2. Wash hands with soap and hot water before beginning, ensuring that any exposed parts of arms are sanitized. Hands are to be washed before and after handling any product as well as in between uses of different products and/or ingredients. Gloves are to be always worn, being changed in between uses of various products to avoid any chance of cross contamination.
3. Verify the sanitizer concentration. Clean, sanitize, and disinfect all work surfaces before use. Repeat this procedure in between use of different product and at the end of the working shift. Wait until all surfaces are completely dry before utilizing.
4. Gather the necessary utensils needed for this recipe and ensure that items are correctly sanitized to the appropriate standards.
5. Using a water bath melt 70% of the white chocolate and leave 30% on the side for tempering.
6. Using a small pot, melt the cocoa butter and begin to infuse with the distillate. Once concentrated cannabis has been used, the corresponding METRC RFID tag is to stay along with all products containing that distillate (this includes at all workstations that are working with infused product, and any storage space that contains this PR# of concentrated cannabis). Amounts of product is to be recorded, tracked, and reviewed if/and when necessary.
7. Monitoring the temperature of the chocolate ensuring that once it has reached 48˚C it is removed from the heat and combined cocoa butter mixture. Temper using the remaining chocolate.
8. Add cookies & cream crumbs and mix well until completely incorporated.
9. Using the mold, fill up each cavity (32) at 6g per unit. Scrape any excess product and use as applicable. Let set. Check after 30 minutes and see if bites are completely ready to demold.
10. In the meantime, while product is setting, disassemble any product equipment, gather utensils, and use the three-compartment sink to wash, rinse, and sanitize.
11. Product will be quarantined and sent for appropriate testing. Upon a passing certificate of analysis, we will be ready to package and label product accordingly.
12. Demold chocolate and package into clear demarked packaging. Inserts hold 10 units that are clearly displayed in packaging that specifies each piece is 10mg of THC. Product storage is to be clearly and correctly labeled with compliance labels and the METRC tag.

Packaging

1. Gather information on the size and number of pieces per batch.
2. Asses the number of bags and inserts needed for finished packaged units and bulk case boxes.
3. Collect/request the required number of packaging, plastic inserts, boxes, and cases.
4. Request or print the labels.
5. Verify all the information is correct on the labels.
6. Set up a workstation and count the number of bags, boxes, cases, and labels to ensure it is accurate.
7. Place the correct label insert in the front of the package.
8. Place the finished product one (1) at a time in each plastic insert within each cavity. 10 pieces go into the 10-pack and 3 pieces go into the 3-pack.
9. Once finished filling the plastic insert with finished product, close the clamshell with the tabs at the end of the insert.
10. Place the filled inserts into the package with the crease side down and tab facing up toward the opening.
11. Close the package and place it in the designated area for sealing.

Cleaning the Kitchen

Handwashing

Each employee engaged in the production of edibles, infused marijuana, or any other cannabis products must wash their hands in the following manner:

1. Rinse hands and any exposed portion of your arms under warm water for at least 10 seconds.
2. Apply cleaning solution on hands and any exposed portion of your arms.
3. Rub the cleaning solution vigorously into your hands and arms for at least 20 seconds.
4. Create friction on the surface of your hands, arms, fingertips, and between the fingers.
5. Ensure you removed all dirt, soil, or other debris from under the fingernails
6. Thoroughly rinse your hands and arms under clean and warm water for at least 15 seconds
7. Immediately dry your hands with an unused, dry paper towel

Floors

At least three (3) times per week, the Kitchen Manager and Staff must:

1. Sweep floors with a broom.

2. Dispose of the collected debris.
3. Fill mop bucket with mild bleach cleaning solutions and warm water.
4. With a wet mop, wipe the floors thoroughly to remove dirt and grind.

Walls, Tables, and Fixtures

1. Soak all equipment and tools for at least 12 hours in a mild bleach solution.
2. Prepare an area for the equipment and tools to dry
3. After 12 hours soaking, remove and place the equipment and tools on the prepared, clean surface.
4. Track all cleaning on the Cleaning Log.

Kitchen Waste

Waste is considered any marijuana or non-marijuana discarded during the production, transport, or package process, including waste discarded as a result of spillage, excess, or contamination.

1. Once waste is identified and categorized, inform the Kitchen Manager.
2. Write and log the waste and event on the appropriate tracker.
3. Wrap and secure the waste in a freezer bag(s).
4. Write the date, batch, amount, and type of waste on the bag with a permanent, black marker.
5. Dispose of the bag of waste in the designated bin.

Adverse Events and Recalls

Mandatory and Voluntary Recalls

If a mandatory or voluntary recall is required, the following steps must be followed:

1. Inform the General Manager and Extraction Manager.
2. Using the Track and Trace System, generate a report to show all vendors that have issued the recalled product.
3. Contact each processor and dispensary by telephone and email.
4. Direct each processor and dispensary to coordinate a pick-up of all recalled product from the facility to be returned and destroyed.
5. Report the recall with the State Board of Pharmacy, Department of Commerce, and State Medical Board.

Recalled Products

The General Manager must secure, isolate, and prevent the distribution of marijuana that may have been affected by a recall and remains in Company's possession. The General Manager must wait to dispose of such items until it receives the Department's approval. The manner of disposal of the recalled medical marijuana must include the following information:

- The date and time of disposal.
- The manner of disposal.
- Volume and weight of solid waste used to render the marijuana unusable.
- Reasoning and description of the disposal.
- Signature of the Type 1 employee overseeing the disposal.
- The batch number or numbers, volume, and weight of any medical marijuana extract or plant materials.
- The lot number, registered product name, volume, weight, and unit count.

Storage

Vault

All in-process medical marijuana product must be stored in the quarantine area of the Vault until tested and approved as being safe and meeting the intended product specifications. All products in food-grade containers are considered eligible for long-term storage and must be moved outside of the quarantine area within a secure product storage room where they must stay until processed further or distributed. Products and waste must only be removed from secure storage by a registered employee authorized by the General Manager.

Storage Quality Control

Storage quality control must incorporate industry-best practices such as Good Handling Practices, as well as applicable rules and regulations as established by the Environmental Protection Agency, including the Federal Insecticide, Fungicide, and Rodenticide Act, the US Department of Agriculture, the Food and Drug Administration, and the local health department to ensure employee and product safety and adherence to best practices of traditional manufacturing operations. The General Manager must ensure that storage environmental conditions are consistent. All storage areas must be maintained in a clean and orderly condition, be kept free from infestation by insects, rodents, birds, and pests of any kind, and be maintained in accordance with applicable laws and regulations as well as Company's secure storage provisions. Damaged product or packages must be quarantined in accordance with the Department regulations and quality assurance plan.

Disposal and Destruction

Overview

Facility employees must collect all marijuana products to be disposed and destroy the product and render it unusable. All disposal procedures must be conducted under video surveillance. The destruction procedure is designed to ensure that marijuana product waste is recorded and rendered unusable/unrecognizable. All marijuana waste must be disposed of in a secure manner that prevents members of the public from accessing any plant material. The General Manager is responsible for disposing of the marijuana waste, arranging pick-up by the disposal agency, and ensuring that all recordkeeping requirements are met. All waste must be disposed of in a timely fashion.

Disposal of Medical Marijuana

Disposal of medical marijuana must be performed by the General Manager (Type 1 employee) in the designated destruction area and performed under video surveillance from the time the destruction begins to when it is placed in the secure waste disposal container. All collected marijuana products to be disposed must be destroyed and made unusable and unrecognizable by opening, crushing, or otherwise exposing the marijuana material and mixed with soil, paper waste, cardboard waste, food waste, yard waste, or other wastes as approved by the Department, such that the resulting mixture is at least 51% non-marijuana waste. Waste that is rendered unusable shall be discarded into the secure waste disposal container for removal from the facility by an authorized third-party waste removal company.

Waste Storage Area

All marijuana waste must be stored and disposed of in a manner that:

- Minimizes the development of odors that could present a public nuisance.
- Minimizes the potential for such waste to attract, harbor, or become a breeding place for pests.
- Protects against contamination of marijuana, contact surfaces, and other facility areas, water supplies, and grounds surrounding the facility.
- Prevents diversion, theft, or loss of marijuana.
- Ensures traceability through internal documentation and real-time electronic tracking in the Track and Trace System.
- Stores it in a secured and locked waste container within an area covered by continuous video surveillance.

Waste and Disposal Log

Every disposal must be recorded on a waste disposal form and include the following information:

- The date and time of disposal.
- The manner of disposal.
- Volume and weight of solid waste used to render the marijuana unusable.
- Reasoning and description of the disposal.

- Signature of the Type 1 employee overseeing the disposal.
- The batch number or numbers, volume, and weight of any medical marijuana extract or plant materials.
- The lot number, registered product name, volume, weight, and unit count.

Procedures

1. Verify within the Track and Trace System and internal logs that the recordkeeping requirements for plant and product maintenance, and other production procedures, were met regarding the marijuana waste being disposed created, handled, and stored.
2. Weigh each waste container containing raw marijuana waste from a single batch or lot, writing down the weight of each, and repeating until all containers with plant waste from each individual batch or lot have been weighed and recorded. All weights recorded must be verified with those entered in the Track and Trace System.
3. After weighing all marijuana waste and confirming entries in the Track and Trace System, Type 1 employee must immediately combine all waste into a secure waste container located within the secure waste storage area, which must be physically segregated, including its HVAC system and as a separate room-from all other usable medical marijuana product within the facility.
4. Ensure that all accumulated marijuana waste located in the secure waste container is rendered unusable each day by grinding it ve1y finely in an industrial grinder located within the waste storage area.
5. Ensure that all marijuana waste that has been rendered unusable shall be rendered unrecognizable by thoroughly mixing with used media or other fine compostable product as required by Department until the mixture contains at least 51 % non-marijuana waste by weight.
6. Place all marijuana waste that has been rendered unusable and unrecognizable in a secure waste container within the secure waste compost storage area at the facility.
7. Ensure that all activities, data, and relevant notes related to rendering marijuana waste unusable and unrecognizable are entered into the Waste Disposal Log within the Track and Trace System, including the name and identification number of the employee carrying out the activities and the manager overseeing them. The records related to the destruction and disposal of all marijuana waste must include all batch and lot identifiers from propagation to disposal.
8. Sanitize and clean all supplies and work surfaces used in the destruction and disposal of marijuana waste.
9. Ensure all other internal logs and checklists are completed prior to the end of the day.

Cleaning and Maintenance

Maintaining the Facility

The General Manager must ensure the facility is maintained in the following manner:

- All floors and benches are free from debris, dust, and any other potential contaminants.
- Control rodents and other pests.
- Only use chemicals, cleaning solutions, and other sanitizing agents approved for use around vegetables, fruit, medicinal plants, or food contact surfaces, and store the items in a manner that protects against contamination.
- Keep equipment in a clean environment and maintain a cleaning and equipment maintenance log at the facility.
- Ensure all scales, balances, or other weight and/or mass measuring devices routinely calibrated using "National Institute of Standards and Technology" (NIST)-traceable reference weights, at least once each calendar year, by an independent third party approved by the department.
- Ensure all water supply is derived from a source that is compliant with Ohio law.
- Implement the policies and procedures related to receiving, inspecting, transporting, segregating, preparing, packaging, and storing plant material, medical marijuana extract, and medical marijuana products in accordance with adequate sanitation principles.

Cleaning Log

The General Manager and Extraction Manager are responsible for ensuring the facility is sanitized and cleaned, including tracking all cleaning activity in the Cleaning Log.

Sanitation

Equipment and surfaces, including floors, counters, walls, ceilings, benches, equipment and fixtures, must be comprised of an easily cleanable material, and maintained in a clean, sanitized and orderly condition, using a sanitizing agent registered by the EPA, in accordance with the instructions printed on the product label. Product contact surfaces must be cleaned and sanitized after the completion of each process and verified as sanitized prior to commencement of any process. Steam cleaning must be used to sanitize production areas, Company uniforms, and processing equipment to eliminate any potential pest or pesticide residues. Unusable plant from marijuana production areas must be removed, and rodents, insects, birds, and other animals must be controlled, and the facility kept free from infestation. All equipment, counters, and surfaces for processing and storing marijuana production material must be food-grade quality and may not react adversely with any solvent being used. Waste disposal must be promptly carried out and be adequate to prevent infestation and ensure waste must not constitute a source of contamination in the facility.

Safety Data Sheet

The facility maintains a Material Safety Data Sheet for all toxic cleaning compounds and sanitizing employees used and facility on premises. General Manager must maintain the data sheet and make it available to the Department, upon request. A copy of the Data Sheet must always be kept and facility in the vault.

Cleaning Compounds

All cleaning compounds and sanitizing employees must be identified and facility in a safe and secure manner, away from areas containing product, to protect against the contamination of medical marijuana.

Handwashing

The facility maintains hand-washing areas for employees. Any person working in direct contact with medical marijuana must:

- Maintain adequate personal cleanliness.
- Regularly wash hands thoroughly before starting work and any other time when hands may have become soiled or contaminated.

Litter and Waste

All litter and waste must be removed, and waste disposal systems must be regularly cleaned and maintained to not constitute a source of contamination in areas where medical marijuana is exposed.

Rodents and Pests

The facility has a third-party pest control service that provide adequate screening against the entry of pests. employees must regularly inspect the premises and dispose of all rubbish to minimize odors and the potential for waste to attract or act as a breeding place for pests.

Daily Cleaning Procedures

The facility must be cleaned daily. Disposable gloves can be used for any cleaning procedure and are recommended for cleaning the bathroom and kitchen areas.

To clean the facility daily, the following steps must be taken:

1. Sweep and/or vacuum the entire facility, including the secure vault room and storage room, being sure to get under the furniture and counters, behind the doors and in the corners, then use the wet mopping wipes through the entire facility as well.
2. Wipe down all countertops daily and as necessary to ensure clean and sanitary conditions for clients and staff.
3. Wipe down computer screens and keyboards.
4. Clean under the computers and container supply storage areas.
5. Clean and wipe down the bathroom and breakroom area using sanitary wipes.
6. Remove trash from all trash cans at the end of each day or as necessary.

Weekly Cleaning Procedures

The facility must be cleaned weekly. Disposable gloves can be used for any cleaning procedure and are recommended for cleaning the bathroom and kitchen areas.

To clean the facility weekly, the following steps must be taken:

1. Vacuum the windowsills and wipe them down with spray cleaner or sanitary wipes.
2. Wipe down the furniture in the lobby.
3. Clean the top of the filing cabinet.
4. Clean the office equipment.
5. Clean the top and inside of the refrigerators.
6. Clean the top and inside of the refrigerator in the breakroom.
7. Organize the items on the shelves in the storage closet.

Glass Breakage

The General Manager and employees must be trained and understand the potential risks associated with glass breakage in the facility. All glass breakage must be recorded in a Glass Breakage Log. In the event of any glass breakage within the Kitchen, Processing, Storage, or other areas in the facility, employees must follow the procedures described below.

1. Stop all production in the area where the glass breakage occurred.
2. Instruct all staff to leave the area. Upon leaving the area, employees must change and replace any clothing that has been affected due to the glass breakage to prevent cross-contamination.
3. Notify the General Manager.
4. Tape of the area. No food items, equipment, or glass may be removed until the area has been tapped off and examined.
5. Immediately quarantine all products in the area and inspect the area.
6. One employee must be designated by the General Manager to sweep and clean the affected area. The employee must wear protective clothing and gloves while cleaning the affected area.
7. All food contact surfaces, equipment, and floors must be wiped down and cleaned by following the Cleaning Procedures. All equipment used to clean the affected area, including vacuums and brooms, must be immediately cleaned following use.
8. All broken glass must be disposed of into the designated waste container.
9. The General Manager must inspect any affected products and ingredients to ensure no contamination occurred. In the event any products or ingredients are affected by the glass breakage, the General Manager must follow the waste procedures by disposing of the affected products.
10. Once the affected area has been cleaned, the General Manager must inspect the area and

approve before resuming production in the area. The affected area must be in safe condition and free of debris. Upon approval, the tape used to tape off the area may be removed.

11. Record the event in the Glass Breakage log.

SECURITY

Security Plan

Restricted Access Facility

Access into the facility is restricted to licensed employees, agents, and visitors permitted to access the facility under the supervision of a licensed employee or agent. All areas of the facility are to be considered as restricted access area and are only to be accessed by badged establishment employees. Only owners (with employee cards), managers, and designated security personnel are allowed in the secure vault room or security equipment areas. All other restricted access areas may only be entered by badged employee employees.

Physical Security

The physical security of the facility relies upon a wireless system with cellular reporting. Any breach or failure of the system including power failures and device-reporting overrides, or failures are automatically reported to the monitoring service. Breaches of any part of the system while in an armed state are automatically reported to the monitoring service and calls are made to the facility management. If management does not respond appropriately with knowledge of the cause of the breach, local authorities are automatically dispatched to the facility. The following device types are deployed:

- Door and window contact sensors
- Motion detectors
- Security card reader entrance devices (biometric controls)
- Video surveillance
- Panic buttons

Video Surveillance System

The video surveillance system incorporates weatherproof video cameras with visual coverage of all angles of every interior space (except restrooms) and all exterior spaces near doors, external walls, and any nearby parking spaces. The video system records all activity 24 hours per day, 7 days a week, and is available for recall for up to 90 days both onsite and from an offsite location. The facility maintains at least one on-site display monitor with a screen size of at least twelve (12) inches. Access to on-site surveillance system controls and monitoring are limited to only authorized personnel.

Panic Buttons

Panic button devices are deployed throughout the facility. Facility employees must be trained on the proper use and response of panic button events during initial employee training and in the annual facility training review sessions. Panic buttons are placed in all key areas. When pressed, an automated call is generated from the security monitoring service to the designated marijuana establishment employee or General Manager. If there is no response, or if the response is not the appropriate all-clear response using a secret password, then local authorities are automatically dispatched to the facility.

Backup Security Systems

During a power outage, the facility's security system runs on an uninterrupted power supply (UPS) system that produces power and ensures the facility can continue to comply with the security requirements outlined by the Department. All security and video surveillance equipment were provided and installed by a licensed security company. All alarm systems were installed by a separate commercial company, which actively monitors the facility's alarm system and notifies the General Manager and local authorities in the case of a security breach. A Security Guard will be actively monitoring the facility 24/7/365.

Loitering Management

When anyone is found to be loitering outside the facility, the following steps must be taken. Loitering is defined as being present for more than a few minutes with any purpose other than a legal facility visit, or other management-approved legal activity.

- In-house security must address the individual and instruct them to leave the property.
- If the individual resists or fails to leave the property for any reason, the local police department must be notified immediately to deal with the issue. If this step is reached, an incident report form must be completed and placed on file in the facility records.
- If an individual returns or becomes a nuisance offender, the local police department must be notified again for further action as determined by the law enforcement authority. Incident reports must be completed and placed on file for each time an activity takes place.
- The State of Ohio Department of Commerce must be notified within 24 hours, if police intervention was required.

Emergency Procedures

For any emergency that includes a strike, fire, flood, other natural disaster, or other emergency of local, state, or national emergency, the following steps must be followed:

- Stay calm and assess the situation to determine if emergency help needs to be called.
- In case of a medical, fire, or security emergency, immediately call 911 or press the panic button if under siege.
- In case of fire escort any clients to the nearest exit and have all staff exit the building immediately.
- Fire extinguishers placed by each door and in the breakroom can be used if you are able to extinguish the fire while maintaining personal safety.
- In case of medical emergency stay with the person in need of assistance until help arrives and apply first aid or CPR steps if you are trained in those responses.

- In case of security emergency first consider your well-being and the well-being of clients as the utmost priority.
- In the event of a robbery, press the panic button if it is convenient, follow dictated instructions to keep everyone safe, and call 911 as soon as possible.
- For all emergencies, contact the General Manager as soon as possible.
- Badged local and state authorities and local fire department officials are authorized to enter our premises without requiring the usual identification and entry into the visitor logbook.

Plans and Elevation Drawings

At all times, the facility must maintain detailed plans and elevation drawings on premises that show all operational areas of the facility and made available to the Department upon request.

Employee Access Records

The facility maintains detailed records of employees with access to locked and secure areas, available to the Department upon request. All employee access records must be maintained for at least 5 years.

Video Security Management

Video playback may be used to review facility and sales activity for suspicion of diversion, or to inspect mistakes in inventory processing or payment exchange handling.

- The contract for the security company that monitors our system is in the facility records in a file labelled “Security”.
- The contract, surveillance records, and recordings must be made available for inspections by local and state authorities.
- All video surveillance equipment, including monitor screens, NVRs, lockbox, backup UPS system, and color printer are in the security equipment room.
- The key for the NVR lockbox is in the safe in the secure vault room.
- The video surveillance logbook is located inside the lockbox and has a list inside the front cover that identifies the individuals on staff who are authorized to access the video surveillance equipment.
- Individuals who are authorized to access video surveillance equipment must be trained by management and be given logins, passwords, and procedures that must be kept confidential.
- Any time the video surveillance equipment is accessed you must log your entry with name, date, time, and state your reason for entry.
- Daily maintenance includes visual inspection of video surveillance monitors to ensure that all cameras are working and recording properly.

Security Equipment Maintenance Procedures

Weekly maintenance of security equipment includes the following:

1. Access the NVR lockbox.
2. Select a sample video clip from a random date and camera number.
3. Download the clip to a USB thumb drive.
4. Take the USB drive with the video clip to a computer.
5. Access the video clip from that computer.
6. Play the clip.
7. Print a still screenshot from the video clip on a color printer.

Monitor or record historical video surveillance footage:

1. Using the mouse next to the monitor screens, right click on the screen and enter the administrator password.
2. Choose Playback from the menu.
3. Select the camera number to view.
4. Select the date to view.
5. Using the mouse, click on the time of day desired to view and click the play button.
6. Other features such as view magnification, screen expanding/contracting, fast-forwarding/slowing can be accomplished using the icons located on the screen indicating such features.

To record a video clip for later extraction:

1. Locate the beginning of the clip desired to export using the mouse and clicking on the timeline.
2. Click on the begin recording button.
3. When the desired amount of clip has been recorded, click on the stop recording button.
4. A clip with the date and time of the action must have been recorded on the NVR hard drive.
5. To exit the video monitoring process, click the button on the bottom of the screen to display all the cameras once again.

To access the NVR and acquire video footage on a USB thumb drive:

1. Open the NVR lockbox and record the access in the video surveillance access log.
2. Insert the USB thumb drive in the USB slot on the front of the NVR.
3. Using the mouse next to the monitor screens, right click on the screen and enter the

administrator password.

4. Choose Download File from the menu.
5. Select the video file from the list displayed with the date/time stamp for the desired file to be extracted.
6. Click on the Copy button, choose the name of the thumb drive as the destination.
7. Click enter and the file must be copied.
8. To exit the video extraction process, click the button on the bottom of the screen to display all the cameras once again.

Playing-back and printing a video still shot from the USB thumb drive:

1. Insert the USB thumb drive into a computer that is connected to a color printer.
2. Navigate with a file explorer to the thumb drive directory.
3. Double click on the video clip file, the video player that was automatically included with the video file must launch and begin to play the video.
4. Using the play, stop, pause, reverse buttons on the video player, locate the still shot desired to be printed and press pause.
5. Right click on the video still shot and select Print, choosing the color printer, and make a hard color copy of the captured video.

Shipping and Receiving

The facility delivery drivers are only allowed to transport medical marijuana to licensees and testing laboratories. The General Manager must oversee the delivery and transportation procedures that employees follow. All deliveries must be accompanied with inventory and delivery manifests.

Transportation Log

Prior to transporting medical marijuana, the General Manager is responsible for ensuring a transportation log is maintained in writing and delivered to the receiving entity and the Department before the close of business the day prior to transport.

The transportation log must contain the following information:

- Names and addresses of the medical marijuana entities sending and receiving the shipment.
- The names and registration numbers of the employees transporting the medical marijuana.
- The license plate number and vehicle type that must transport the shipment.
- The time of departure and estimated time of arrival.
- The specific delivery route, which includes street names and distances.

- The total weight of the shipment and a description of each individual package that is part of the shipment, and the total number of individual packages.

Track and Trace System

Employees must ensure all the information from the shipping manifest is recorded and includes the following information:

1. The name, license number, and licensed premises address of the originating licensee.
2. The name, license number, and licensed premises address of the licensee transporting the medical marijuana goods.
3. The name, license number, and licensed premises address of the destination licensee receiving the medical marijuana goods into inventory or storage.
4. The date and time of departure from the licensed premises and approximate date and time of departure from each subsequent licensed premises, if any.
5. Arrival date and estimated time of arrival at each licensed premises.
6. Driver license number of the personnel transporting the medical marijuana goods, and the make, model, and license plate number of the vehicle used for transport.

Acquisitions and Transfers

Authorized employees may only acquire plant material from a licensed cultivator or dispensary. Transfers of marijuana or infused products from a cultivator or and dispensary must be recorded using the designated transfer function within the state-approved tracking system METRC.

Dispensary Acquisitions

Authorized employees may only acquire plant material from a licensed dispensary under the following conditions:

- The plant material has reached or exceeded the expiration date listed on the label.
- The plant material must be processed into medical marijuana extract for use in the manufacture of medical marijuana products.
- The plant material acquired from the dispensary may not be combined with other batches of plant material during processing.
- The medical marijuana products manufactured using the plant material may not be identified as or associated with the brand, cultivator, or processor that originally packaged and sold the plant material to the dispensary.
- The medical marijuana products manufactured using the plant material must be subject to laboratory testing.

Delivery Vehicle

Delivery vehicles are temperature controlled and capable of securing medical marijuana by lock during transportation. The lockbox must always remain securely affixed inside the delivery vehicle. At least 2 delivery employees must accompany each delivery, with at least 1 employee always remaining with the vehicle whenever the vehicle contains marijuana.

The delivery vehicle meets the following requirements:

- Insured
- Contains a locked, safe, and secure storage compartment.
- At all times, holds access to a secure form of communication with personnel at the facility and the ability to contact law enforcement through a 911 emergency system.
- Does not contain any marks, logos, brands, or other illustrations on the exterior of the vehicle, other than those affixed by the vehicle manufacturer or dealership.

Delivery Requirements

At least 2 delivery employees must accompany each delivery, with at least 1 employee remaining with the vehicle any time it contains medical marijuana. During each delivery, delivery employees must do the following:

- Display employee identification card always and produce it to the Department and law enforcement, upon request.
- Ensure delivery times vary and routes are randomized.
- Report any vehicle accident to the General Manager within 2 hours after the incident occurs.
- Report any loss or theft of medical marijuana.
- Carry a copy of the transportation log.
- Notify the General Manager when a delivery has been completed.

Shipping to a Licensee

To transport medical marijuana to a licensee, follow these steps:

1. Print the inventory manifest and ensure it contains the following:
    - Originator and receiver license numbers
    - Name and contact information for originator and receiver
    - Address of destination
    - Quantity by weight
    - Date of transport
    - Approximate time of departure

- Estimated time of arrival
- Identity of employees accompanying the transport.
- Delivery vehicle and license number

2. Ensure there are two copies of the inventory manifest, one for the delivery employees and one for the receiving facility.
3. Place the medical marijuana products into shipping containers that contain a UIN.
4. Secure the container in the locked, safe, and secure storage compartment of the vehicle.
5. Ensure the delivery drivers have a valid registry identification card and driver's license on them.

Transportation to Body and Mind Dispensary

Body and Mind Dispensary is located next door at 709 Sugar Ln., Elyria, Ohio 44035. Medical marijuana products packaged and ready for sale are permitted to be transported to the Body and Mind Dispensary without a vehicle.

Below are the requirements to transport medical marijuana goods to Body and Mind Dispensary.

- Display employee identification card always and produce it to the Department and law enforcement, upon request.
- Ensure delivery times vary and are randomized.
- Report any incident to the General Manager within 2 hours after the incident occurs.
- Report any loss or theft of medical marijuana.
- Carry a copy of the transportation log.
- Notify the General Manager when a delivery has been completed.

To transport product to the dispensary, the following procedures must take place:

1. Print the inventory manifest and ensure it contains the following:
    - Originator and receiver license numbers
    - Name and contact information for originator and receiver
    - Address of destination
    - Quantity by weight
    - Date of transport
    - Approximate time of departure
    - Estimated time of arrival
    - Identity of employees accompanying the transport.

- Identify of Security personnel accompanying the transport

2. Ensure there are two copies of the inventory manifest, one for the delivery employees and one for the dispensary.
3. Place the medical marijuana products into shipping containers that contain a UIN.
4. Secure the container in the locked, safe, and secure storage compartment.
5. Ensure all employees and Security personnel have a valid registry identification card on them.
6. At least 1 authorized employee and 1 Security Officer must accompany the delivery.

Receiving

1. Upon delivery of new package, sign in courier as a visitor, record their employee card information, and escort the courier to the package receiving area.
2. Retrieve the check or checks from the safe if payment is ready.
3. Open all boxes and locate the RFID tags.
4. Review the inventory manifest and make sure to check three (3) things:
    - Match the RFID tag number on the physical item to the RFID tag number in the manifest
    - Match the physical item for each RFID tag to the item description in the manifest for each RFID tag.
    - Count the physical items for each RFID tag and compare to the item counts listed in the manifest for each RFID tag.
5. Print the time and date products received on the manifest, and then sign and print your name on the bottom of the manifest.
6. If any of the deliverable items do not agree with the manifested details, inform the General Manager, who must decide to take one of the following actions:
    - Reject the entire manifest.
    - Reject any mismatching line items.
    - Accept the manifest, making appropriate adjustments to the actual item amounts received in the formal state-approved tracking system METRC during acceptance.
7. Review the invoice and make sure all product and pricing is correct.
8. If correct, stamp the invoice, sign, date, and write check #. Have the courier sign to ensure they received the check.
9. If there is no payment prepared, check with the General Manager on how to proceed.

10. Review testing status in state-approved tracking system METRC.
11. If the product is not cleared or approved, contact vendor to return product.
12. Verify all labeling information.
13. If not meeting state standards for ingredients, test results, and required warnings, immediately contact the vendor to return product.

Accepting Product

1. Log in to state-approved tracking system METRC.
2. Make sure you have the correct license # selected.
3. Click the transfers tab then the incoming tab.
4. Find correct transfer by checking the manifest identification number on the physical manifest record against the list of incoming manifests.
5. Ensure that all information is correct, adjusting any line items as instructed by the General Manager.
6. Click receive.
7. Next log into the Track and Trace System and record the RFID tag.
8. Verify that all information is correct on the screen.
9. If item has never been in facility, add this item to the catalog at the bottom of the page.
10. Fill in required fields using the manifest and invoice, paying special attention to the subcategory, price and unit of measure.
11. Print barcodes for the correct number of items.
12. Sticker all product, add to shelves, and run inventory if necessary.
13. Stock out and put away any extra product in stock room.

Receiving Hazardous Materials

The General Manager is responsible for overseeing and monitoring the receiving process of hazardous materials at the facility. All hazardous materials received at the facility must be inspected by the receiving employee to ensure it is labeled correctly and a copy of the SDS is accompanied with the materials received.

Safety Data Sheets for Hazardous Materials

The procedure below will be followed when an SDS is not received at the time of initial shipment:

1. Reject any shipment that is not accompanied with an SDS.

2. Immediately following the rejection, contact and inform the supplier.
3. The General Manager summarize the event and complete an Incident Report Form.

SDSs will be readily available to all workers in each work area during each work shift. If an SDS is not available, immediately contact the General Manager.

Copies of SDSs for all hazardous chemicals to which employees are exposed or are potentially exposed will be kept and secured in the office. Employees can access SDSs electronically or in binders located in the office.

When revised SDSs are received, the following procedures will be followed to replace old SDSs:

1. Create a folder titled “Archive” on the facility network.
2. Archive old SDSs electronically into the Archive folder.
3. Scan and save paper copies electronically in the archive folder.
4. Replace new SDS in the SDS binder located in the office.

The General Manager is responsible for monitoring receiving and reviewing the SDSs received for safety and health implications and initiating any needed changes in workplace practices.

Hazardous Labels

A label on a primary or original container containing hazardous supplies must include:

- Product identifier;
- Signal Word;
- Hazard statement(s);
- Pictogram(s);
- Precautionary statement(s); and
- Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.

Each secondary container of hazardous chemical in the workplace shall be labeled, tagged, or marked with either:

- All of the information from the primary or original container; or
- The product identifier and words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical. Signs, placards, process sheets, batch tickets, operating procedures or other written materials may be used in lieu of affixing labels

to individual stationary process containers.

Employees are not required to label portable/secondary containers into which hazardous chemicals are transferred from labeled containers and which are intended only for the immediate use of the employee who performs the transfer (for that shift only – will be discarded after). This exemption is applicable only to containers that will be used by the person who transferred the chemical from the labeled container. Containers containing hazardous chemicals that will be utilized by employees other than the one performing the transfer, including employees on other shifts, must be labeled.

Ingredients

All ingredients received at the facility must be inspected and recorded in the Receiving Log and stored away from hazardous materials and medical marijuana products. All ingredients requiring refrigeration must be stored in the refrigerator at 35-38 degrees Fahrenheit. In the event an ingredient that requires refrigeration is left in an environment under 35 degrees Fahrenheit or above 38 degrees Fahrenheit for more than 20 minutes, it must be discarded, disposed, and recorded in the waste log.

All ingredients received at the facility that contain allergens must be labeled with an allergen warning. The following types of ingredients are considered allergens:

- Dairy
- Peanuts
- Tree nuts
- Fish
- Shellfish
- Wheat
- Eggs
- Soy
- Gluten

Recordkeeping

Electronic Records

Company must maintain electronic records using an electronic database. Company has contracted with a third-party software provider to use their fully integrated inventory and client management systems. Combined with the state-approved tracking system METRC, Company has redundant traceability systems in place. All inventory, procedures, and other documents must be kept on the premises and made available to the Department, upon request.

All business records must be kept primarily utilizing company-approved electronic record keeping and inventory systems, which are periodically backed up. Records must be kept and maintained on premises for at least 5-years. All physical files must be scanned in electronically and maintained on the record keeping systems. All records must be provided to the Department, if requested. All facility electronic recordkeeping systems meet the following requirements:

- Guarantee confidentiality.
- Capable of providing safeguards against erasures and unauthorized changes in data.
- Capable of placing a litigation hold or enforcing a records retention hold for purposes of investigating or pursuant to litigation.
- Capable of being reconstructed in the event of a malfunction or accident resulting in the destruction of data.

Type of Records

The following records must be kept and maintained for period of at least 5 years. No exceptions.

- Sale records
- Transportation records
- Disposal records
- Samples records
- Laboratory testing records
- Security records
- Inventory records, including METRC.
- Processing, manufacturing, and production records.
- Storage records, which includes types and forms of medical marijuana stored and maintained at the facility on a daily basis.
- Extraction, refining, manufacturing, packaging, and labeling records.
- Financial records
- Employee records
- Records of theft, loss, or other unaccountability of medical marijuana.

Financial Records

The following financial records must be kept and maintained for a period of at least 5-years.

- Transactions and contracts for services
- Purchase invoices, bills of lading, manifests, sales records, copies of bill of sale.

- Bank statements and cancelled checks
- Accounting and tax records

Employee Records

The following employee records must be kept and maintained for a period of at least 5-years.

- Hiring records
- Employee contact and emergency contact information
- Registration number and access credential designation
- Date of hire, date of separation, and the reasons for the type of separation.
- Training, education, and disciplinary records
- Salary and wages, bonuses, benefits, values paid to any individual affiliated with the company.
- Documentation that employees have successfully trained in accordance with the operations plan.
- Visitor logs.

Production and Disposal Records

The medical marijuana production and disposal records must be stored at the facility and include all the following information:

- Strain or product name, form, and quantity of marijuana involved.
- Date of production or removal from production.
- Reason for removal
- A record of all medical marijuana sold, transported, or otherwise disposed of.
- Date and time of selling, transporting, or disposing of the medical marijuana.

Track and Trace Systems

Redundant records must be maintained in the Track and Trace System and the state-approved tracking system METRC for the following functions:

- Client Records
- Inventory Records
- Pesticide and chemical applications.
- Transaction Journals

- Sales Records
- Sales of Medical Marijuana Records to Clients and other Dispensaries
- Acquisition of Medical Marijuana from Cultivation Facilities or other Dispensaries
- Medical marijuana disposal and waste records

Third-Party Software

Multiple Third Parties perform the following record keeping functions:

- Payroll reporting and filing
- Sales Tax Reporting and filing
- Audit Firm – Income Tax Return Preparation and Filing

Quickbooks

QuickBooks Professional 2018 is used for the following functions:

- Assets
- Liabilities
- Checks
- Invoices
- Vouchers

DropBox

An electronic storage system known as Dropbox.com is used to facility:

- Agreements
- Images
- Document Storage

Retention

All records must be kept and maintained on premises for at least 5-years. All records must be provided to the Department, if requested.

Reporting Loss, Theft, and Emergency

Reporting Loss or Theft

In the event of loss, theft, or diversion of medical marijuana, a Type 1 key employee must notify the Department and law enforcement by submitting a statement that details the estimated time, location, circumstances, and inventory quantity and type within 24 hours of discovering the event.

Within 10 days of the submitted loss, theft, or diversion report, the General Manager must also do the following:

- Review and secure video surveillance footage during the time of the suspected theft or diversion.
- Conduct an audit of the actual inventory compared to the inventory reported by the inventory tracking systems.
- Submit a report that contains:
    - The name and identification numbers of every employee at the facility at the time of the suspected theft or diversion.
    - The internal measures taken to locate the cause of the loss, theft, or diversion.
    - The total quantity and type of medical marijuana following the audit.
- Identify and secure all relevant records and potential evidence, including video surveillance footage, to prevent from being destroyed until a full investigation is conducted by the Department and law enforcement, if necessary.

Emergency Reporting

The General Manager must notify the Department within 24-hours of discovering the following events. Within 10 days, the General Manager must also submit a written report to the Department detailing the event.

- An alarm activation or other event that requires a response by public safety personnel.
- Any type of breach of security.
- Failure of security alarm system due to a loss of electrical support or mechanical malfunction.
- Fire
- Hazardous materials related incident.
- Any other emergency.