

DELIVERY PROCEDURES

Following are Buttercup & Spring's Delivery Procedures as requested in the MCDOR Site Review Submittal Guide for your use and review.

1. VEHICLE LIST- the following section lists the company's delivery vehicles

Buttercup & Spring is currently sourcing our fleet of delivery vehicles. We intend to purchase unmarked Toyota Prius or another electric or hybrid vehicle to minimize our carbon footprint.

2. VEHICLE ALARM SYSTEM- the following section describes the company's delivery vehicle alarm systems

Buttercup & Spring shall use the Viper System or comparable system and shall provide the County with all the system features upon selection and installation.

3. NEW DELIVERY ORDERS PROCEDURES- the following section describes the company's procedures for accepting new deliveries

Orders are placed through the company's website via our technology platform [REDACTED]

[REDACTED]). Patrons are then able to view the existing inventory for the selected location. When delivery is active, the car icon will appear during the shopping process. Upon checkout, the option for both pickup and delivery will be available. The time slot will default to the next two hours, although the patron is able to choose a window later in the day if preferable. The patron's ID is required to be uploaded prior to purchase. Once an order is complete, the "verifying" screen will display. The patron will receive a text notification that will reflect the appropriate store information.

The order will appear on both of the designated iPads located in the sales area. A receipt will print in conjunction with the order listing all items that were ordered. [REDACTED]

[REDACTED].

4. ORDER PREPARATION PROCEDURES- the following section describes the company's procedures for preparing orders for delivery

The packaging employee will enter their credentials into the designated iPad and package the order according to the printed receipt. Upon completion, the employee will mark "prepare". This will notify the delivery drivers of an available order on the technology platform. Once the order has been accepted by a driver, an additional receipt will print including the packaging employee's name and employee number. The packaging employee then attaches both receipts to the exit bag and places the order into professional transport devices such as the Pelican Vault cargo containers under the supervision of security staff in our designated loading, limited access area within the facility. Once the product is secured and locked, the delivery personnel shall be escorted to the delivery vehicle by the security staff to ensure the product is loaded safely in to the rear of the delivery vehicle.

5. CANNABIS GOODS STORAGE DURING DELIVERY PROCEDURES- the following section describes the company's procedures for storing cannabis goods during delivery

Cannabis goods are stored



6. DELIVERY PERSONNEL LOCATION TRACKING PROCEDURES- the following section describes the company's procedures for tracking our employees during delivery

The delivery vehicles are equipped with the Auto-Mate system that shall utilize the Viper VSM550 GPS system or comparable system. The GPS

was installed in the vehicle themselves by an authorized retailer. The VSM 550 GPS device is traceable through the Viper Smart Start Application. While logged into the application, you are able to view the real time location plotted on Google

We are able to cross reference the GPS location with the delivery software manifests as well as the Find My iPhone Application installed on the company issued cell phone.

7. DELIVERY ROUTE GUIDANCE PROCEDURES- the following section describes the company's route guidance procedures during delivery

The delivery driver will highlight "directions to drop off" then select "On way I Start" via the delivery software on the company cell phone prior to leaving the retail facility. The will then be prompted to select a method of route guidance, selecting Google Maps. The delivery software will open Google Maps and the delivery driver will select "Start". The phone is placed in the secure holder in the delivery vehicle. It will then provide a visual map that provides turn by turn directions as well as an automated voice communicating the driving directions.

8. DELIVERY BREAKS AND STOPS POLICY- the following section describes the company's policy regarding breaks and stops during delivery

Delivery employees are not to make stops or take breaks while en route or with pending deliveries in the vehicle per the standard operating procedure.

Delivery vehicles will be filled with gas prior to delivery being active, or after delivery is inactive per the standard operating procedure.

When a delivery employee is nearing a break time, they will no longer accept pending deliveries. They will return to the Retail Facility. Breaks will be taken according to state law.

9. DELIVERY OF CANNABIS GOODS TO PATRON PROCEDURE -
the following section describes the company's procedures regarding the
delivery of the cannabis goods to our patrons

Upon arrival, the delivery software will display a screen alerting the driver they have arrived at the delivery location. Per the SOP, the driver is aware of prohibited locations. [REDACTED]

[REDACTED] verify that the identity matches the order, verify age and order with the patron. [REDACTED]

[REDACTED] The patron will sign electronically on the delivery software, then the driver will sign on the delivery software. The patron is given their order and the order is marked complete. The receipt will transmit electronically.

Once safely inside the vehicle, the delivery driver will notate the transaction type on the duplicate receipt that was placed in the designated folder and re-file.

10. DELIVERY EMPLOYEE PREMISES RETURN PROCEDURE -
the following section describes the company's procedures regarding the
actions to be taken upon the delivery employee's return to the premises.

After deliveries are conducted, the delivery driver returns to the retail premises. They will adjust their on board bank and prepare for future deliveries. They will check in with the manager on duty and work as a Sales Associate in the retail premises until additional delivery orders are placed.

At the end of each driver shift, the following report will be pulled, saved and maintained electronically for 7 years

Reference	Current Stage	Created Local	Delivery Instructions	Merchant Name	Driver Name	Driver ID	Pickup Address	Destination Address	Destination Name	Destination Email	Destination Phone	Picked Up Local Time	Completed Local Time	Distance By Road Miles	Notes
792708	Completed	2025-04-18 14:35	NV202501061 96 Store Order 227 Total \$4.72 0988 1. Store Code: 01234	Bliss Desert Inc	Mallory Prasade	60607 6-916- 4782- 0630 0753792 0694	1130 E Desert Inn Rd. Las Vegas, NV 89109, USA	1090 East Desert Inn Road, Las Vegas, NV, USA	7221 - Mission Prasade	mparasade@bliss- inc.com	17026509502	14:28:09	18:31:45	0.81328	Desert Inn Rd. was closed. Turned right and was left on and was left on and was left on
792942	Completed	2025-04-11 10:35	NV202501061 96 Store Order 227 Total \$4.72 0988 1. Credit Card 01234	Bliss Desert Inc	Mallory Prasade	60607 6-916- 4782- 0630 0753792 0694	1130 E Desert Inn Rd. Las Vegas, NV 89109, USA	1090 East Desert Inn Road, Las Vegas, NV, USA	7221 - Mission Prasade	mparasade@bliss- inc.com	17026509502	11:02:51	13:58:39	0.81328	

Created Local: Drive date

Picked Up Local Time: Time the order was picked up from the Retail facility

Pick Up Address: Address of the Retail facility
Completed Local Time: Time the order was delivered to the customer
Destination Address: Customer address

Delivery Address: Patron address

Destination Phone: Patron phone number

Completed Local Time: Time Parton accepts delivery

Notes:

If a stop is made while a driver is en route, notes are entered into the GetS wtft.co application. The notes export on the Excel report under this column . If for any reason the delivery driver must exit the vehicle , the cannabis goods must be locked in the designated compartment, the vehicle must be locked and the alarm set.

If a driver were to accept an order while en route that they are able to fill with current inventory, the stop will also be notated here .

Vehicles are to be filled with gas at the end of each shift and if necessary, midday, this must be done with no accepted deliveries or product in the vehicle. Delivery drivers will no longer accept deliveries (taking into consideration the time to complete) prior to rest and meal break

periods. The delivery driver will complete all of the accepted orders and return to the Retail facility before all breaks.

INVENTORY PROCEDURES

Following are Buttercup & Spring's inventory procedures as requested in the MCDOR Site Review Submittal Guide for your use and review.

1. RECEIVING INVENTORY- the following section describes the inventory intake procedures

- a)** Cannabis goods order is placed with licensed vendor through Buttercup & Spring's Buyer.
- b)** Shipping Manifest, invoice, test results, and vendor/distributor licenses are received ahead of time for 1st review and delivery time is confirmed and scheduled.
- c)** Licensed distributor arrives at Buttercup & Spring and identification is verified at Reception.
- d)** Licensed distributor driver will receive a visitor's badge and will be logged with date, time of arrival, company and reason for visit.
- e)** Once distributor receives visitor badge, they will meet the Inventory Clerk at the unloading area door.
- f)** The distributor and cannabis goods will be escorted through the Unloading Area and then into the Packaging Room (All areas have key or credentialed access)
- g)** Inventory will then be verified that the cannabis goods are accurately reflected in the shipping manifest by confirming that the number of boxes of cannabis goods, type of cannabis goods, weight and/or units of cannabis goods matches the label on the boxes containing the cannabis goods.

If the delivered inventory matches the previously sent documents, the inventory is then taken in to our inventory via our POS system.

The Inventory Manager will reject any cannabis goods that do not match the items described on the shipping manifest.

2. CANNABIS GOODS STORAGE- the following section describes how cannabis goods are moved into the product storage area.

Once Cannabis goods have been reviewed and verified they will be carried from the Packaging Room and then into the Product Storage Room (All areas have key, credentialed, or pin pad access).

3. CANNABIS GOODS STORAGE ACCESS- the following section describes how cannabis goods are moved into the product storage area.

Only Management and Inventory Clerks will have access to the Product Storage Area. 


4. CANNABIS GOODS STORAGE /ENVIRONMENTAL CONTROLS the following section describes how cannabis goods are stored and their freshness maintained.

- Product Storage Room will be kept at 68 degrees Fahrenheit to maintain the optimal environment to preserve the freshness of the product.

- The HVAC equipment for this area and all areas of the Premises will have charcoal filters to mitigate and eliminate any odor from exhausting into the exterior of the building.
- Flower will be stored in opaque bins that latch to maintain freshness
- All Cannabis Goods will be stored at least 6 inches off the floor
- First in First out: Back logs in the Inventory Storage Room allow the Inventory Staff to keep track of which product batches were received first so we ensure the older product is sold first.

5. CANNABIS GOODS STORAGE CONT. - The following section describes how cannabis goods are stored to limit deterioration and contamination.

- As noted above, all cannabis goods are stored in an environmentally controlled room at 68 Degrees to optimize product freshness and limit deterioration.
- In addition, all cannabis goods are kept in its original, child-resistant packaging and stored in opaque, sealed storage binds in shelving no less than 6” off the floor to eliminate contamination.
- Pest Control will be contracted and will only be allowed to use environmentally conscious and food safe products ensuring that our cannabis goods is protected and not contaminated.
- Daily Cleaning Logs: Blum employees are required to perform and log cleaning procedures daily to ensure the entire facility is sanitized and free of dust and debris

6. REMOVING AND RETURNING INVENTORY - The following section describes how cannabis goods are removed or returned from inventory and records produced.

Reasons Cannabis Goods would be removed from Inventory:

- Destruction of expired cannabis goods, sniff jars, and returned defective cannabis goods.
- Exchange of defective items from Vendor /Distributor

Removing Cannabis Goods from Inventory:

- When removing Cannabis Goods from Inventory, the Inventory Clerk will adjust the quantity in the POS System and provide a reason for removal or destruction Cannabis Waste.

Reasons Cannabis Waste is Generated:

- Sniff Jars/Display
- Defective Cannabis Goods
- Expired Cannabis Goods Storage of Cannabis Waste:
- Cannabis Goods that need to be destroyed will be removed from Ready for Sale Inventory in the POS. The Inventory Clerk will transfer the Cannabis Good Item into the Quarantine category on the POS.
- Once product is transferred to Quarantine within the POS, it will be manually logged into the quarantine logs while awaiting destruction. Inside the Inventory Storage Room is a Quarantine section containing opaque bins separated by, Defective>Returns, Sniff Jars/Displays, and Employee Samples. All Bins are kept on Quarantine shelf at least 6 inches off the floor.

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Destruction:

- Destruction of Cannabis Goods will take place every Monday
- Inventory Clerk will log product out of Quarantine log
- Inventory Clerk will grind Cannabis Goods in a blender with detergent and/or coffee

- Inventory Clerk will record the destruction process & remove the Cannabis Goods from POS while providing a reason for Destruction in the Notes

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Destruction Records include the following information:

- The name of the employee performing the destruction or disposal.
- The reason for destruction or disposal.
- The name of the entity being used to collect and process cannabis waste
- Product name (description)
- POS SKU (PCS assigned number)
- Batch Number
- Net Weight
- METRC Tag number (Track & Trace)
- Signature and Date

Return Policy and Procedures:

██████████ - Defective items may be returned for store credit or exchanged for equal or lesser value within 14 days of purchase. ██████████

██████████. Returned items will either be destroyed or exchanged with the Vendor for the same product or product of equal value.

Product Returns Procedures:

1. Once a product is returned from a consumer it is put back into the POS to the original batch.
2. To keep quarantined product separate from the actual usable product in POS system Clerks must make a product that is exactly the same name with a "Q" added to the end with the product type as Quarantine.
3. Product must then be immediately added to the Defective/Returns Quarantine List. Once the quarantine product has been saved, converted, and the return log is filled out, clerks must initial and date the Quarantine Log.
4. Once the product is added to the log, place the product in a sign

and sealed bag, then place the sign and sealed bag in the appropriate quarantine bin. (There should be one sign and sealed bag per vendor)

7. INVENTORY RECONCILIATION- The following section describes Buttercup & Spring's inventory reconciliation procedures.

Our inventory is reconciled every 14 days in the following manner:

Step 1- PM Procedures

- a) Management will print the inventory report and remove the current quantities so that the Inventory Clerk will conduct a "blind" inventory count after business hours.
- b) Inventory Clerk then completes a full physical count of the onsite inventory.

Step 2- AM Procedures

- a) AM Manager will print the AM inventory report
- b) AM manager will verify the inventory report matches the hand count done by the Inventory Clerk the night before, see 1 b), above.
- c) If no discrepancies are noted between the AM report and the PM hand count, then the inventory will be saved and considered reconciled.
- d) If there are discrepancies between the two reports, the AM Manager will conduct their own hand count of the items in questions.
- e) If the AM Manager hand count matches the AM report, then the PM Report is noted as a "miscount" and inventory shall be considered reconciled.
- f) If there is a discrepancy between the AM Manager hand count and the inventory report, then AM manager and security personnel shall review camera footage to

determine the cause of the discrepancy.

Step 3- Discrepancy Records

After the Manager completes the investigation and it is determined that there is not a significant discrepancy or theft, the Inventory Manager will sign off on the discrepancies on the inventory reports, save the Discrepancy Report in our files and make the necessary adjustments of inventory levels in our SOP system.

If a significant discrepancy or theft is noted, then the Manager shall notify the Bureau and local authorities immediately.

The following records will be filed in a fire proof safe for at least 7 years and will be made available to the Bureau and local authorities upon request:

- Discrepancy Report
- Inventory Report and its respective hand count

NON-LABORATORY QUALITY CONTROL PROCEDURES

Following are Buttercup & Spring's Non-Laboratory Quality Control Procedures as requested in the MCDOR Site Review Submittal Guide for your use and review.

1. LABEL VERIFICATION- the following section describes the company's label requirements verification procedures

As noted in our Inventory Procedures, and the enclosed checklists, our Inventory Clerks shall verify the labels of all cannabis goods meet the labeling requirements as set forth in the Bureau of Cannabis Control Regulations. Please see enclosed Invoicing Checklist and Shipping Manifest for a complete list of all labeling items to be verified.

2. LABEL VERIFICATION CONT.- the following section describes the company's label contents verification procedures

As noted in our Inventory Procedures, and the enclosed checklists, our Inventory Clerks shall verify the labels of all cannabis goods contain the required labeling as set forth in the Bureau of Cannabis Control Regulations. Please see enclosed Labeling Checklists for a complete list of all labeling content to be verified.

3. PACKAGING VERIFICATION- the following section describes the company's packaging verification procedures

As noted in our Inventory Procedures, and the enclosed checklist, our Inventory Clerks shall verify the packaging of all cannabis goods meet the packaging requirements as set forth in the Bureau of Cannabis Control Regulations. Please see enclosed Packaging Checklist for a complete list of all labeling content to be verified.

****Please note- Any cannabis goods that do not meet the requirements for packaging or labeling as set forth in the Bureau of Cannabis Control Regulations and noted in the enclosed**

checklists will be rejected by our Inventory Clerks and returned to the distributor of origin.

Invoicing Checklist

Per BUSINESS AND PROFESSIONS CODE - BPC

DIVISION 10. Cannabis [26000 - 26250]

26161.

(a) Every sale or transport of cannabis or cannabis products from one licensee to another licensee must be recorded on a sales invoice or receipt. Sales invoices and receipts may be maintained electronically and must be filed in such manner as to be readily accessible for examination by employees of the licensing authorities or California Department of Tax and Fee Administration and shall not be commingled with invoices covering other commodities.

(b) Each sales invoice required by subdivision (a) shall include the name and address of the seller and shall include the following information:

- (1) Name and address of the purchaser.**
- (2) Date of sale and invoice number.**
- (3) Kind, quantity, size, and capacity of packages of cannabis or cannabis products sold.**
- (4) The cost to the purchaser, together with any discount applied to the price as shown on the invoice.**
- (5) The place from which transport of the cannabis or cannabis product was made unless transport was made from the premises of the licensee.**
- (6) Any other information specified by the licensing authority.**



BUREAU OF CANNABIS CONTROL

CALIFORNIA

CANNABIS GOODS SHIPPING MANIFEST CHECKLIST

Business and Professions Code section 26070 requires a licensed distributor or microbusiness arranging for the transportation of cannabis goods to complete a shipping manifest prior to transporting cannabis goods.

A shipping manifest must include all of the following:

- Name, license number, and premises address for:
 - The licensee who possesses the cannabis goods
 - The licensee transporting the cannabis goods
 - The licensee receiving the cannabis goods
- Name and license number of any licensee involved in the activity or transaction who is not shipping, transporting, or receiving the cannabis goods
- Date and time of activity
- Date and time of departure from first premises, and estimated time of departure for subsequent premises if cannabis goods are being shipped from multiple premises in one transport vehicle
- Estimated date and time of arrival at each receiving premises
- Driver license number for any person driving the transport vehicle
- Make, model, and license plate number of transport vehicle
- Name and type of cannabis goods to be transported

- Unique identifier
- Amount of cannabis goods in weight or unit count

The shipping manifest must be completed by the distributor and transmitted in the track and trace system to the Bureau and receiving licensee.

If the distributor has not yet obtained access to the track and trace system, the licensee shall transmit the shipping manifest to the Bureau and receiving licensee by electronic mail.

Shipping manifests shall be sent to the Bureau at bcc@dca.ca.gov.

If the receiving licensee has not yet obtained access to the track and trace system, the distributor shall transmit the shipping manifest to the receiving licensee by electronic mail.

A physical copy of the shipping manifest must be carried in the transport vehicle at all times while transporting cannabis goods. The shipping manifest must be provided to law enforcement and Department of Consumer Affairs agents upon request.

Upon receipt, the receiving licensee shall ensure the cannabis goods received are as described in the shipping manifest and accept the cannabis goods in the track and trace system. If there is a discrepancy between the cannabis goods received and the shipping manifest, the receiving licensee shall document the discrepancy in the track and trace system and any other relevant business record.



SALES INVOICE/ SHIPPING MANIFEST

PLEASE USE PERMANENT INK FOR ALL ITEMS

INVOICE/MANIFEST NUMBER:			
ATTACHED PAGE(S)?	YES	NO	# OF ATTACHED PAGES:

ACTUAL DATE AND TIME OF DEPARTURE:	/ /	AM PM
ESTIMATED DATE AND TIME OF ARRIVAL:	/ /	AM PM

SHIPPER INFORMATION	
STATE LICENSE #	
TYPE OF LICENSE	
BUSINESS NAME	
BUSINESS ADDRESS	
CITY, STATE, ZIP CODE	
PHONE NUMBER	
CONTACT NAME	

RECEIVER INFORMATION	
STATE LICENSE #	
TYPE OF LICENSE	
BUSINESS NAME	
DELIVERY ADDRESS	
CITY, STATE, ZIP CODE	
PHONE NUMBER	
CONTACT NAME	

DISTRIBUTOR INFORMATION			
STATE LICENSE #		DRIVER'S NAME	
BUSINESS NAME		CA DRIVER'S LICENSE#	
STREET ADDRESS		VEHICLE MAKE	
CITY, STATE, ZIP		VEHICLE MODEL	
PHONE NUMBER		VEHICLE LIC. PLATE #	
CONTACT NAME		ACTUAL DATE AND TIME OF ARRIVAL	/ / AM PM

PRODUCT SHIPPED DETAILS							
SHIPPER COMPLETES ALL THE UNSHADED COLUMNS BELOW. RECEIVER COMPLETES <u>ONLY</u> THE SHADED COLUMNS BELOW							
(Please attach additional pages, if needed)							
UID TAG NUMBER (IF APPLICABLE)	ITEM NAME <u>AND</u> PRODUCT DESCRIPTION (INCLUDE WEIGHT OR COUNT)	QTY ORDERED	QTY REC'D	UNIT COST	TOTAL COST	RETAIL ONLY	
						UNIT RETAIL VALUE	TOTAL RETAIL VALUE

PRODUCT REJECTION	
<i>IF PRODUCTS ARE REJECTED, PLEASE CIRCLE THE ITEMS BEING REJECTED IN THE PRODUCT SHIPPED DETAILS SECTION ABOVE</i>	
REASON FOR REJECTION:	

PRODUCT RECEIPT CONFIRMATION			
<p>I CONFIRM THAT THE CONTENTS OF THIS SHIPMENT MATCH IN WEIGHT AND COUNT AS INDICATED ABOVE. I AGREE TO TAKE CUSTODY OF ALL ITEMS AS INDICATED RECEIVED ABOVE – AND WHICH ARE NOT CIRCLED. THE PRODUCTS CIRCLED ABOVE ARE REJECTED FOR DELIVERY AND REMAIN IN THE CUSTODY OF THE DISTRIBUTOR FOR RETURN TO THE SHIPPER AS INDICATED ON THIS FORM AND ALL ATTACHED PRODUCT DETAILS SHEET(S).</p>			
NAME OF PERSON RECEIVING AND/OR REJECTING PRODUCT:		PHONE NUMBER:	
SIGNATURE OF PERSON RECEIVING AND/OR REJECTING PRODUCT:		DATE SIGNED:	

LABELING REQUIREMENTS

FLOWER AND FLOWER-ONLY PRE-ROLLS



Cannabis must be properly labeled to ensure consumers are informed about what they are purchasing and to prevent unintended use. These guidelines apply to all cannabis flower and flower-only pre-rolls sold within California.

PRIMARY PANEL — the part of the label displayed to consumers at retail; typically the front or top of the package

- Product Identity** — A generic or common name that describes the item. Examples include flower or pre-roll.
- Net weight** — list weight in both metric and U.S. customary units (Example: NET WT. 4.0 oz. (113.4 g))
- Universal Symbol** (in black, at least 0.5" X 0.5") — The California symbol that identifies cannabis and cannabis products. The symbol can be downloaded at www.cdph.ca.gov/mcsb.

INFORMATIONAL PANEL — any part of the label that is not the primary panel

- UID number** — The unique tracking number issued through the Track-and-Trace system
Note: *This requirement will begin when you receive your Track-and-Trace login. Do not create a placeholder UID number.*
- Licensee name and phone number or website** — The licensee name can be either the name of the licensed cultivator or licensee packaging the product and must be a name listed on the license certificate (either the legal business name or the registered DBA)
- Date of packaging for retail sale** — Include month, day and year
- Government warning statement** (*in capital and bold letters*)

OTHER LABELING — may be on either the primary or informational panel

- Cannabinoid content** (*in percentage*)

DOs

- Display information clearly and legibly
- Use English and at least 6 point font
- Make sure all labeling information is displayed on the outer layer of packaging
- Additional product information may be added as long as it is truthful and not misleading

DON'Ts (§40410)

- **California county names** — Unless 100% of cannabis in the product is grown in the county, the name of a California county cannot be included on the label.
- **Cannot be attractive to children** — This includes using cartoons, images popularly used to advertise to children, imitating candy labeling, and using the words “candy,” “candies” or a play on words such as “kandy” or “kandeez” anywhere on the label.
- **Cannot include false or misleading information** — This includes anything untrue or unproven, or information that leads consumers to have an inaccurate impression, or the use of the word “organic” anywhere on the label.
- **Cannot make unproven health claims** — Health-related statements, such as claims about a product’s ability to treat or cure disease, may not be made unless there is significant scientific agreement and the claims are supported by a totality of publicly-available peer-reviewed evidence. Anecdotal information and preliminary study results do not meet this criteria.
Note: *Health-related statements are heavily regulated by the FDA, and cannabis businesses are not exempt from federal prosecution for misleading health statements.*

FIND MORE HELP ONLINE

Visit the CDPH website for more information on the packaging and labeling requirements:
www.cdph.ca.gov/mcsb

ADDITIONAL REQUIREMENTS

Prop 65 Warning (if applicable) — Proposition 65 requires businesses to provide a clear and reasonable warning before knowingly and intentionally exposing anyone to chemicals that are known to the state to cause cancer or birth defects or other reproductive harm. For more information on Prop 65 and applicable requirements, visit <https://oehha.ca.gov/proposition-65>.

Note: *If cannabis extract or other concentrates are added to the flower or pre-rolls, it is a manufactured product and must follow all CDPH requirements for manufactured cannabis products.*

LABELING REQUIREMENTS

MANUFACTURED CANNABIS PRODUCTS



Cannabis products must be properly labeled to ensure consumers are informed about what they are purchasing and to prevent unintended use. These guidelines apply to manufactured cannabis.

LABELING PLACEMENT

Where does the required labeling go?

Most of the required labeling must be placed on the outer layer of packaging. The outer labeling requirements are divided into two categories, based on the part of the package where it belongs.

- **Primary Panel** – the part of the label most likely to be displayed to the consumer at retail; typically the front or top of the package
- **Informational Panel** – any other part of the label that is not the primary panel

If the product has multiple layers of packaging, you must also include basic labeling on the inner container that holds the cannabis product:

- Inhaled cannabis products (vape cartridges, shatter, wax, etc.) – must include the universal symbol
- Non-inhaled cannabis products (edibles, tinctures, topicals, etc.) – must include the product identity, universal symbol and net weight or volume. Edible products must also include the words “Cannabis-Infused.”

What if my package is small and I can't fit all of the required information on the outer layer?

You can use a supplemental label to include some of the required information. Examples include, hang-tags, peel-back labels, and inserts.

Note: QR codes, websites and other methods that separate the information from the product are not acceptable types of supplemental labeling.

DOs

- Display information clearly and legibly
- Use English and at least 6 point font
- Ensure all required labeling is displayed on the outer layer of packaging

DON'Ts (§40410)

- **California county names** – Unless 100% of cannabis in the product is grown in the county, the name of a California county cannot be included on the label.
- **Cannot be attractive to children** – This includes using cartoons, images popularly used to advertise to children, imitating candy labeling, and using the words “candy,” “candies” or a variation, such as “kandy” or “kandeez” anywhere on the label.
- **Cannot include false or misleading information** – This includes anything untrue or unproven, or information that leads consumers to have an inaccurate impression, or the use of the word “organic” anywhere on the label.
- **Cannot make unproven health claims** – Health-related statements, such as claims about a product’s ability to treat or cure disease, may not be made unless there is significant scientific agreement and the claims are supported by a totality of publicly-available peer-reviewed evidence. Anecdotal information and preliminary study results do not meet this criteria.

Note: Health-related statements are heavily regulated by the FDA, and cannabis businesses are not exempt from federal prosecution for misleading health statements.

- **Cannot include a picture of the product (for edible cannabis products only)** – State law required edibles to be in opaque packaging to reduce the risk that a child would be attracted to the product. Photographs or other images of the product cannot be on the label for the same reason.
- **Cannot market the product as an alcoholic beverage** – More information on this label restriction can be found in the Bureau of Cannabis Control regulations §5041.1.

FIND MORE HELP ONLINE

Visit the CDPH website for more information on the packaging and labeling requirements: www.cdph.ca.gov/mcsb

LABELING REQUIREMENTS

MANUFACTURED CANNABIS PRODUCTS



LABELING CHECKLIST (FOR OUTER LAYER OF PACKAGING)

PRIMARY PANEL — the part of the label displayed to consumers at retail; typically the front or top of the package

- Product identity** — A generic or common name that describes the product. Examples include chocolate, fruit chew, vape cartridge, lotion, tincture, etc.
- Universal symbol** (in black, at least 0.5" x 0.5") — The California symbol that identifies items as containing cannabis. Download the symbol at www.cdph.ca.gov/mcsb.
- Net weight or volume** (in both metric and U.S. customary units) — The weight or volume of the contents of the package.

Edible cannabis product labels must also include:

- "Cannabis-Infused"**— These words must be listed above the product identity, in a bold font and larger text size than the one used for the product identity.

INFORMATIONAL PANEL — any part of the label that is not the primary panel

- Manufacturer name and contact information*** — Must be a name listed on the license certificate (either the legal business name or the registered DBA), and their phone number or website
- Date of manufacture/packaging*** — One date may be used. Include month, day and year. (Example: MFG/PKG: 02/23/19)
- Government warning statement for cannabis products*** (capital letters and bold font)
- UID number**— The unique tracking number issued through Track-and-Trace
Note: This requirement will begin when you receive your Track-and-Trace login. Do not create a placeholder UID number.
- Batch or lot number**
- Instructions for use and any preparation needed*** — For example, the method of consumption or application
- List of all ingredients*** (in descending order by weight or volume) — Include sub-ingredients, if any
- Allergens*** (if applicable) — The word "Contains," followed by a list of any major food allergen in the product. The major food allergens are milk, egg, tree nuts, wheat, peanuts, soybeans, fish or crustacean shellfish. Use the specific food name when disclosing allergens (i.e. "almonds" instead of "tree nuts").
- Artificial food colorings*** (if applicable)
- Expiration, use-by or best-by date*** (if applicable)
- "KEEP REFRIGERATED" or "REFRIGERATE AFTER OPENING"*** (if perishable after opening)
- "FOR MEDICAL USE ONLY"*** (if applicable) — Manufacturers must include these words on the label if the product contains a THC concentration that can only be sold in the medicinal market.

Edible product labels must also include:

- Sodium, sugar, carbohydrates, and total fat per serving*** (in milligrams or grams)

OTHER LABELING — may be on either the primary or informational panel

- Cannabinoid content** (in milligrams) — Cannabinoid content may be added to the label by the manufacturer before testing or on the distribution premises after testing.
 - THC and CBD per package (for all manufactured products)
 - THC and CBD per serving (for edibles and concentrates with designated serving sizes)
 - Any other cannabinoid that makes up 5% or more of the total cannabinoid content (if labeled after testing)

* Indicates labeling information that may be placed on a supplemental label

ADDITIONAL REQUIREMENTS

Prop 65 Warning (if applicable) — Proposition 65 requires businesses to provide a clear and reasonable warning before knowingly and intentionally exposing anyone to chemicals that are known to the state to cause cancer or birth defects or other reproductive harm. For more information on Prop 65 and applicable requirements, visit <https://oehha.ca.gov/proposition-65>.

CRV Recycling (for beverages, if applicable) — Beverage manufacturers are responsible for labeling qualifying beverage containers with recycling information. For more information, visit <https://www.calrecycle.ca.gov/bevcontainer>.

PACKAGING REQUIREMENTS

CANNABIS AND CANNABIS PRODUCTS



The Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA) includes basic requirements for how cannabis and cannabis products must be packaged before sale. These guidelines apply to all cannabis flower, pre-rolls and manufactured cannabis products sold within California.

PACKAGING CHECKLIST

- Tamper Evident** – A consumer knows if the package has been opened.
Example: a plastic seal, a sticker across the lid that is ripped when opened, a jar with a lid that pops up after opening, etc.
- Child Resistant** – The package is designed to be difficult for children under five years of age to open. See below for more information about what qualifies as child resistant.
- Resealable** (for products with multiple uses) – The package can be closed after each use.
Example: a lid, adhesive closure, box top closure, etc.
- Opaque** (for edibles only)* – The package is not transparent; consumers cannot see the product through the packaging
**Amber-colored bottles are considered opaque.*
**Opaque bottles used for beverages may use a single, vertical, clear strip less than 0.25" wide to indicate serving sizes.*

DOs

- Cannabis flower may be packaged by a cultivator, manufacturer or distributor. Manufactured cannabis products must be packaged and labeled by the manufacturer prior to transfer to a distributor as finished products.
- Protect products from contamination and exposure to any toxic or harmful substances
- If a product has multiple layers of packaging, the packaging requirements can be fulfilled using any one of those layers.

DON'Ts

- Cannot imitate packaging used for products typically marketed to children
- Cannot imitate packaging used for non-cannabis food products

CHILD-RESISTANT PACKAGING (CRP)

State law requires all cannabis and cannabis products to be in child-resistant packaging. Until December 31, 2019, a child-resistant exit package, used by a retailer at the time of sale, may be used to fulfill the CRP requirement. Beginning January 1, 2020, every individual product must be in a child-resistant package.

What qualifies as child-resistant packaging?

- Packages that have been certified as child-resistant, in accordance with the federal Poison Prevention Packaging Act (PPPA, 16 CFR §1700.1)
- A bottle sealed with a pry-off metal crown bottle cap
- Plastic packaging that is at least 4 mils. thick and heat-sealed without an easy-open tab, dimple, corner or flap

Types of CRP:

- **Single Use** (“Initial CRP”) – the package is initially child-resistant, but once opened, it is no longer child-resistant. If used, the package’s label must say “This package is not child-resistant after opening.”
- **Multiple Use** (“Lifetime CRP”) – the package maintains its child-resistance throughout the life of the package. It can be opened and closed, but still remains child-resistant.

WHAT REQUIRES INITIAL CRP?

- Flower and flower-only pre-rolls
- Inhaled concentrates (infused pre-rolls, vape cartridges, shatter, wax, etc.)
- Topicals
- Single-serving cannabis products

WHAT REQUIRES LIFETIME CRP?

- Edibles
- Orally-consumed concentrates (tinctures, capsules, etc.)
- Suppositories

NOTE: A package containing multiple servings is not required to be in lifetime CRP if each individual serving is in child-resistant packaging.

Packaging and Labeling Checklist

Per Section § 5303 Packaging, Labeling and Rolling

(a) A licensed distributor may package, re-package, label, and re-label cannabis, including pre-rolls, for retail sale. All packages of cannabis, including pre-rolls, shall comply with the following:

(1) Until January 1, 2020, all packages shall meet the following requirements:

(A) The package shall protect the cannabis, including pre-rolls, from contamination and shall not expose the cannabis or pre-rolls to any harmful substance.

(B) The package shall be tamper-evident.

(C) If the package of cannabis or pre-rolls contains more than one serving, then the packaging shall be resealable.

(D) The package shall not imitate any package used for goods that are typically marketed to children.

(2) Beginning January 1, 2020, all packages shall meet the requirements of subsection (a)(1) of this section and shall also meet the following requirements:

(A) The package shall be child-resistant until the package is first opened. For purposes of this division, the following packages are considered child-resistant:

(i) Any package that has been certified as child-resistant under the requirements of the Poison Prevention Packaging Act of 1970 Regulations (16 C.F.R. §1700.15(b)(1)) (Rev. July 1995), which is hereby incorporated by reference.

(ii) Plastic packaging that is at least 4 mils thick and heat-sealed without an easy-open tab, dimple, corner, or flap.

(B) The package shall be labeled with the statement “This package is not child-resistant after opening.”

(3) Notwithstanding subsections (a)(1)-(a)(2) of this section, immature plants and seeds shall not be required to be packaged in child-resistant, tamper-evident, and resealable packaging.

(b) A licensed distributor shall not process cannabis, but may roll pre-rolls that consist exclusively of any combination of flower, shake, leaf, or kief. Pre-rolls shall be rolled prior to regulatory compliance testing.

(c) Licensed distributors may label and re-label a package containing manufactured cannabis goods with the amount of cannabinoids and terpenoids based on regulatory compliance testing results.

SECURITY PROCEDURES

Following are Buttercup & Spring's Security Procedures as requested in the MCDOR Site Review Submittal Guide for your use and review. Please also see our Security Plan, enclosed, for a comprehensive review of all our security procedures.

1. SECURITY STAFF- the following section outlines the staff responsible for implementing the security operating procedures and their respective roles and responsibilities.

During business hours there will be a uniformed, security officer protecting the Buttercup & Spring Facility. Security staff will be provided training specific to the special needs of Buttercup & Spring's patrons and staff. Each security officer will possess a BSIS Guard Card and Firearm Permit as required, and at all times shall be equipped with the appropriate safety equipment. Security staff will incorporate high-profile deterrence methods along with non-confrontational interactive techniques to deter trespassing, robbery, theft and disturbances.

The security team will be led by a qualified security manager and trained in non-confrontational and de-escalation techniques that utilize verbal communication and limited physical force techniques. The security team's responsibilities include, but are not limited to:

- Ensuring that a state of the art security alarm system is operated and maintained, and incorporates a series of door and window sensors, fixed and wireless panic switches and twenty-four-hour monitoring. This system will be equipped with a failure notification activation that will alert security and managerial personnel.
- Ensuring a state of the art [REDACTED] for staff access to authorized areas of the facility is operated and maintained. The issuance of [REDACTED] ensures electronic access only to authorized secure areas, while providing digital evidence of the card usage for future review will be monitored. Immediate deactivation of [REDACTED] [REDACTED] will be completed by management as appropriate and notifications made to the security staff.

- Ensuring an array of physical deterrents, such as but not limited to access-controlled doors, walk-in vaults, and interior and exterior security/trespassing signage are in use and monitored.
- Ensuring windows and roof hatches are properly secured and equipped with safety latches that may be released quickly from the inside to allow exit in the event of an emergency.
- Ensuring commercial grade exterior lighting is operational and maintained to provide adequate illumination of the facility to ensure proper video surveillance of the property.
- Ensuring that all vegetation, trees and other objects are cleared so as to provide an unobstructed view of the facilities perimeter.
- Ensuring hand-held radios are used to communicate between management, staff, and security personnel.
- Ensuring that the security plan is maintained, reviewed and updated as necessary, particularly after an incident.
- Ensuring that limited access areas are secure and accessible only to authorized personnel.
- Ensuring all cannabis products are stored in a locked display case, cabinet, safe, vault or room within the facility.
- Ensuring all employees are trained in the use of the alarm system, panic buttons, emergency and critical incident response protocols.

2&7. SECURITY ALARM SYSTEM- The following section describes how the company will ensure all access points will be secured and provide additional information regarding the alarm system features.

Buttercup & Spring's facility will be monitored using a state of the art system installed, undergo quarterly maintenance reviews and operated by [REDACTED] with the following contact information:

[REDACTED]
[REDACTED]
[REDACTED]

The system will detect unauthorized entry onto the exterior property or the interior of the facility using motion detectors and entry point contact devices and activate an alarm. In the event of a motion detector or entry point contact activation, alarm monitoring personnel will observe real-time video feeds of the facility to determine if an actual threat exists. Should an intruder be observed on the property, the alarm monitor will immediately notify the County Police Department and on scene security staff. The proposed alarm system eliminates false alarm notifications to the County Police Department thus preventing the unnecessary deployment of valuable police resources and false alarm fines. A notification system will alert management of any alarm failure.

The surveillance system shall be pre-installed with battery packs to ensure the camera system and all its components to remain fully operational during a power outage. [REDACTED]

If the system shuts down for any reason, the [REDACTED] [REDACTED] allow uninterrupted protection and alarm monitoring.

A failure notification will be installed providing an audible and visual alert to the Security Manager, and the Facility Director, within five minutes of a triggering event causing the surveillance system's failure by phone, email, and text message.

The Security Manager shall ensure all security system equipment and recordings are maintained in a secure location so as to prevent theft, loss, destruction, and alterations.

All points of ingress and egress will be secured by commercial-grade, non-residential locking mechanisms and all limited access areas shall have solid doors.

3. ACCESS CONTROLS AND RESTRICTED AREAS- The following section describes the procedures allowing individual access to the premises.

Security procedures relating to facility access are as follows:

- Only employees, officials in the course of their duties, and vetted/approved outside vendors, contractors, and visitors will be allowed access to the facility.
- Employees will display identification at all times while working in the facility.
- Employees will immediately report a lost identification badge to their supervisor. A lost employee identification and or access card will result in immediate deactivation and the issuance of a new card.

All doors without biometric or electronic access control systems will be re-coded or re-keyed annually and following any voluntary or involuntary termination.

On-site surveillance rooms will remain locked and shall not be used for any other function. A list of authorized employees and service personnel that have access to the surveillance room will be maintained by the General Manager and available to the Cannabis Bureau upon request.

Facility [REDACTED] will be issued by the General Manager or his/her designate. It is against company policy for any employee to duplicate keys without written permission of the General Manager.

The General Manager will oversee the management of the keying and coding systems of the company. All [REDACTED]

[REDACTED] Log by the General Manager with the following information:

- Employee name
- Employee number
- Identification
- Date issued
- Term of issuance
- Date to be returned

- Signature



Access will be given only to areas where a specific need can be demonstrated. Issuance will be recorded by the issuing individual in the [REDACTED] Log.

Any employee losing a [REDACTED] will be required to report the loss to his or her General Manager immediately. The General Manager will make a determination as to whether the system has been compromised and whether to [REDACTED]

When employment with the company has been terminated, all keys will be returned by the employee, documented and noted in the General Manager's report. The manager terminating an employee is responsible for collecting all [REDACTED]. Failure on the part of a manager to collect [REDACTED] from terminating employees may require a key core change. After an employee or contractor no longer has access, the General Manager must provide written notice to Buttercup & Spring, including the date of the event, within ten (10) working days.

Non-Employee Access to the Premises-

Access will be provided to all non employees only after security personnel has verified their government issued ID and entered the visitor's name, employer, the reason for their visit and the date and time of their entrance and exit in our visitor log in conformance with Section 5042 of the BCC regulations. This log shall be made available to the BCC and the local authorities immediately upon request.

BUTTERCUP & SPRING

8001 BINFORD ROAD,
NOVATO, CA 94945

SECURITY PLAN

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PURPOSE

The purpose of this security plan is to ensure that Buttercup & Spring has a comprehensive security system combined with a 24-hour a day physical security presence to detect and prevent diversion, theft, or loss of cannabis product and unauthorized entry.

California Code of Regulations Title 16 Division 42. Bureau of Cannabis Control provides regulation of cannabis operations, including the following:

- 5036. Notification of Theft, Loss, and Criminal Activity
- 5042. Access to Limited-Access Areas
- 5043. Licensee Employee Badge Requirement
- 5044. Video Surveillance System
- 5045. Security Personnel
- 5046. Locks
- 5047. Alarm System
- 5311. Requirements for the Delivery of Cannabis Goods
- 5421. Delivery Route

Buttercup & Spring of Marin County is committed to providing a safe and secure facility and workplace. Human life, public safety and security are essential components of the services we provide to our customers and the community. A comprehensive security plan has been developed to fulfill this commitment to ensure that access to our facility is safe, secure and limited to employees and visitors approved under Marin County Cannabis Regulations and Municipal Code.

The Buttercup & Spring security plan is based upon measures that have been implemented at multiple dispensaries and cannabis facilities successfully operating at multiple California sites, as well as sites in Nevada.

The policies and procedures of the Buttercup & Spring Security Plan and Critical Security Response Protocol provide the facility with the most comprehensive safety and security possible. It is the responsibility of the Security Manager and General Manager to ensure these protocols are followed and constantly evaluated for effectiveness and revised as necessary.

POLICY AND PROCEDURES OVERVIEW

This security plan details all provisions in compliance with those ordinances adopted by Marin County all applicable state laws.

Measures to deter and prevent unauthorized entrance into areas containing cannabis products and theft of cannabis products at the facility are addressed throughout the plan. Access to the facility is limited to Buttercup & Spring management, employees and those persons allowed access by the County ordinance and California State law.

Buttercup & Spring operates in a ‘high security risk’ environment, therefore, the established security policies and procedures are strictly enforced. These security measures include:

- Preventing unauthorized/unlawful entry to the Buttercup & Spring facility.
- Preventing unauthorized individuals from remaining on the Buttercup & Spring property if they are not engaging in activity related to Buttercup & Spring operations.
- Establishing limited access areas.
- The storing of all cannabis products in a secured and locked room, safe, or vault bolted to the floor on the property and in a manner as to prevent diversion, theft, and loss.
- The storing of all unusable and excess cannabis in accordance with Buttercup & Spring Waste Disposal Policies & Procedures, until the product is disposed of.

EMERGENCY CONTACTS

County Police Headquarters – 911

County Fire Department – 911

County Public Works – (415) 473-6528

General Manager – TBD

Security Consultant- [REDACTED]

On-site security provider – [REDACTED]

Alarm system provider – [REDACTED]

Surveillance system provider – [REDACTED]

SECURITY PLAN

Buttercup & Spring Security Plan details protocols to control the ingress and egress of employees, vendors and visitors, as well as measures to deter trespassing and unauthorized entrance to the facility and perimeter property. Specific security protocols are documented in the Standard Operating Procedures for Security & Safety. In addition, the Critical Security Response Protocol outlines responses in the event of an emergency or critical incident.

SECURITY STRATEGY

Buttercup & Spring will utilize a 24/7 centrally monitored safety and security system capable of detecting and alerting Buttercup & Spring management and emergency responders of fire, burglary, robbery, and unsafe CO2 levels.

Buttercup & Spring will install a state of the art surveillance system that electronically monitors and records all interior and exterior areas twenty-four hours a day, seven days per week. The surveillance system will be of appropriate quality, color, rendition and resolution to be capable of identifying any individual on the premises or its adjacent areas. These recordings are maintained for a minimum of ninety (90) days.

Buttercup & Spring will contract with the [REDACTED] to provide a comprehensive security, surveillance, smoke, fire and robbery alarm system. The [REDACTED] is licensed by the State of California, Department of Consumer Affairs Bureau, of Security and Investigative Services (BSIS) in accordance with California Business & Professional Code 7590.

Access to the surveillance system servers will be restricted to the General Manager, Security Manager, and IT Manager. The Cannabis Bureau, law enforcement and County departments will have access to recorded surveillance at all times as mandated. Access granted to any other individuals shall be approved and documented by the General Manager and Security Manager.

SECURITY STAFF

During business hours there will be a [REDACTED]

[REDACTED]

The security team will be led by a qualified security manager and trained in non-confrontational

and de-escalation techniques that utilize verbal communication and limited physical force techniques. The security team's responsibilities include, but are not limited to:

- Ensuring that a state of the art security alarm system is operated and maintained, and incorporates a series of door and window sensors, fixed and wireless panic switches and twenty-four-hour monitoring. This system will be equipped with a failure notification activation that will alert security and managerial personnel.
- Ensuring a state of the art card-key system, programmed for staff access to authorized areas of the facility is operated and maintained. The issuance of card keys ensures electronic access only to authorized secure areas, while providing digital evidence of the card usage for future review will be monitored. Immediate deactivation of the card keys will be completed by management as appropriate and notifications made to the security staff.
- Ensuring an array of physical deterrents, such as but not limited to access-controlled doors, walk-in vaults, and interior and exterior security/trespassing signage are in use and monitored.
- Ensuring windows and roof hatches are properly secured and equipped with safety latches that may be released quickly from the inside to allow exit in the event of an emergency.
- Ensuring commercial grade exterior lighting is operational and maintained to provide adequate illumination of the facility to ensure proper video surveillance of the property.
- Ensuring that all vegetation, trees and other objects are cleared so as to provide an unobstructed view of the facilities perimeter.
- Ensuring hand-held radios are used to communicate between management, staff, and security personnel.
- Ensuring that the security plan is maintained, reviewed and updated as necessary, particularly after an incident.
- Ensuring that limited access areas are secure and accessible only to authorized personnel.
- Ensuring all cannabis products are stored in a locked display case, cabinet, safe, vault or room within the facility.
- Ensuring all employees are trained in the use of the alarm system, panic buttons, emergency and critical incident response protocols.

VIDEO SURVEILLANCE

“NUMBER(DIGIT)” Video cameras will be installed and monitored by [REDACTED]. The video surveillance system will be maintained in proper working condition and utilized with a minimum of ninety (90) days of continuous digital recording capability and in a format approved by the state. Video surveillance will operate 24 hours per day, 7 days per week covering all storage

areas, entry and exit doors, all windows, and any other areas necessary to provide comprehensive coverage.

All surveillance recordings will be in a format that ensures authentication and guarantees no alteration of recorded footage.

Video cameras shall be placed in all areas that may contain cannabis; at all points of entry and exit, and in any parking lot, which shall be appropriate for the normal day and night lighting conditions of areas under surveillance.

Cameras shall be directed at all safes, vaults, and areas where cannabis is processed, prepared, stored, or handled.

Cameras shall be angled so as to allow for the capture of clear identification of any person entering or exiting the facility or area.

Video cameras shall have a recording resolution of at least [REDACTED], as required by State regulations.

Video cameras in each grow room shall be capable of identifying any activity occurring within the grow room in low light conditions.

Twenty-four-hour recordings from all video cameras that are available for immediate viewing by the local and state representatives upon request and that are retained for at least 90 calendar days.

Recordings shall:

- Not be destroyed or altered and shall be retained as long as necessary if the facility is aware of a pending criminal, civil, or administrative investigation, or legal proceeding for which the recording may contain relevant information.
- Have the ability to immediately produce a clear, color, still photo (live or recorded).
- Have a date and time stamp embedded on all recordings. The date and time shall be synchronized and set correctly and shall not significantly obscure the picture.
- Video cameras and recording equipment shall have the ability to remain operational during a power outage with sufficient battery backup to support at least 5 minutes of recording.
- A video recording that allows for the exporting of still images in an industry standard image format, including .jpg, .bmp, and .gif.
- Exported video shall have the ability to be archived in a proprietary format that ensures authentication of the video and guarantees that no alteration of the recorded image has taken place.

- Exported video shall also have the ability to be saved in an industry standard file format that can be played on a standard computer operating system.
- A CIF resolution quality recording at a minimum of 15 frames per second and will be archived and available for inspection for an additional ninety (90) days.
- All recordings shall be erased or destroyed prior to disposal.

SECURITY ALARM SYSTEM

Buttercup & Spring facility will be monitored after normal business hours using a state of the art system operated by [REDACTED]. The system will detect unauthorized entry onto the exterior property or the interior of the facility and activates an alarm. In the event of a door, window or roof activation, alarm monitoring personnel will observe real-time video feeds of the facility to determine if an actual threat exists. Should an intruder be observed on the property, the alarm monitor will immediately notify the “[REDACTED]” and on scene security staff. The proposed alarm system eliminates false alarm notifications to the “[REDACTED]”, thus preventing the unnecessary deployment of valuable police resources and false alarm fines. A notification system will alert management of any alarm failure.

The surveillance system shall be [REDACTED] to ensure the camera system and all its components to remain fully operational during a power outage. Additional batteries can be added to scale the backup to almost any length of time.

If the system shuts down for any reason, the [REDACTED] supply the necessary power to allow uninterrupted protection and alarm monitoring.

A failure notification will be installed providing an audible and visual alert to the Security Manager, and the Facility Director, within five minutes of a triggering event causing the surveillance system’s failure by phone, email, and text message.

The Security Manager shall ensure all security system equipment and recordings are maintained in a secure location so as to prevent theft, loss, destruction, and alterations.

EMPLOYEE ID BADGES

All agents, officers, or other persons acting for or employed by you must display a laminated or plastic-coated identification badge issued by the licensee at all times while engaging in commercial cannabis activity. The identification badge shall, at a minimum, include:

- DBA
- License number
- Employee’s first name;

- Employee number exclusively assigned to that employee for identification purposes; and
- Color photograph of the employee that clearly shows the full front of the employee’s face and that is at least 1 inch in width and 1.5 inches in height.

LOCK STANDARDS

All points of ingress and egress will be secured by commercial-grade, non-residential locking mechanisms.

SIGNAGE

A 12” x 12 “sign will be conspicuously mounted at each public access point in bold lettering not to be less than 1” in height, stating “This facility is digitally monitored and recorded.”

LIGHTING

The exterior of the facility will be illuminated with commercial grade lighting capable of providing enhanced visibility for night time video surveillance and any law enforcement response to trespassing or other criminal activity.

SECURED AREAS

Locked/secured areas will be accessible only to authorized personnel, and all cannabis and cannabis products are stored in a locked safe or vault and in such a manner as to prevent theft or loss. All unusable and excess cannabis will be disposed in accordance with Buttercup & Spring Waster Disposal Policies & Procedures. .

ANCILLARY ACCESS POINTS

All windows and any roof hatches at the facility must be secured so as to prevent unauthorized entry and be equipped with quick-release safety latches to allow for exit in the event of an emergency. The latches must comply with all applicable County Building and Fire Code provisions. The roll-up door will be secured with commercial grade locks and removable bollards will be placed in front of the door after business hours to prevent forced entry.

ACCESS CONTROLS AND RESTRICTED AREAS

Security procedures relating to facility access are as follows:

- Only employees, officials in the course of their duties, and vetted/approved outside vendors, contractors, and visitors will be allowed access to the facility.
- Employees will display identification at all times while working in the facility.
- Employees will immediately report a lost identification badge to their supervisor. A lost employee identification and or access card will result in immediate deactivation and the issuance of a new card.

All doors without biometric or electronic access control systems will be re-coded or re-keyed annually and following any voluntary or involuntary termination.

On-site surveillance rooms will remain locked and shall not be used for any other function. A list of authorized employees and service personnel that have access to the surveillance room will be maintained by the General Manager and available to the Cannabis Bureau upon request.

[REDACTED] will be issued by the General Manager or his/her designate. It is against company policy for any employee to duplicate keys without written permission of the General Manager.

The General Manager will oversee the management of the [REDACTED] systems of the company. All [REDACTED] are recorded and tracked in the [REDACTED] [REDACTED] Log by the General Manager with the following information:

- Employee name
- Employee number
- Identification
- Date issued
- Term of issuance
- Date to be returned
- Signature

[REDACTED]

Access will be given only to areas where a specific need can be demonstrated. Issuance will be recorded by the issuing individual in the [REDACTED] Log.

Any employee losing a [REDACTED] will be required to report the loss to his or her General Manager immediately. The General Manager will make a determination as to whether the system has been compromised and whether to re-key, re-core or re-code.

When employment with the company has been terminated, all keys will be returned by the employee, documented and noted in the General Manager's report. The manager terminating an employee is responsible for collecting all [REDACTED]. Failure on the part of a manager to collect [REDACTED] from terminating employees may require a key core change. After an employee or contractor no longer has access, the General Manager must provide written notice to Buttercup & Spring, including the date of the event, within ten (10) working days.

PREVENTION MEASURES

The most effective way to ensure the safety and security of employees, vendors and visitors is to utilize deterrence and prevention strategies. All employees are required to have a good working knowledge of the security policies and procedures and implement prevention measures into daily activities. These measures include, but are not limited to:

- Only main facility entrances may be used for access to the facility. Auxiliary doors may only be used in case of emergency.
- Storage rooms should be secured with a lock that can be opened from the inside. A hide-a-key may be placed in the room if the lock cannot be opened from the inside so that employees are not locked inside during an Incident.
- Department managers shall vary employee lunch and break schedules to ensure maximum coverage.
- Employees will be trained to greet every visitor to a facility immediately and look each visitor directly in the eyes noting any nervousness or strange behavior in the visitor.
- Enclosed locked areas will be cleaned regularly to remove old fingerprints. Oil or wax-based cleaners must not be used.

SUSPICIOUS ACTIVITIES

Each employee will be trained to report suspicious activities and persons to the security staff and General Manager. The security staff shall notify law enforcement when a suspicious incident or potential risk is identified. If a suspicious person is observed on or around the facility the

security staff will notify law enforcement and the General Manager. Should the person leave before an officer's arrival, the time will be recorded along with a detailed description of the suspect(s), their vehicle(s) and any associates will be documented. Video surveillance will be reviewed, downloaded and forwarded along with other information to responding law enforcement as appropriate.

Suspicious activity may involve coworkers, vendors, or unknown persons and include:

- Persons monitoring business operations.
- Persons asking about closing times, volume of business, the amount of money on hand, etc.
- Persons who appear to loiter in the area checking the business layout and operations.
- Persons who may be waiting for a lull in activity and fewer customers.
- Suspicious vehicle parked for long periods of time or occupied with suspicious persons

OPENING AND CLOSING PROCEDURES

When opening or closing the facility, two employees are required to be present. Security staff will escort employees and oversee the opening and closing of the facility to ensure employee safety. Security staff and employees will inspect the business for forcible entry before entering the business and survey the premises before admitting others.

Security equipment will be inspected prior to opening and prior to closing to ensure the necessary surveillance of all operating activities. At closing, security and employees will survey the premises for persons hiding in the business, near the building entrance, in the parking lot and surrounding areas. During the opening and closing of the facility, security staff will observe and/or escort employees to and from the parking lot and observe them exiting and entering their vehicles.

DELIVERY PROCEDURES

Delivery of cannabis products will be performed in accordance with the Bureau of Cannabis Control and County regulations and Buttercup & Spring delivery procedures.

DELIVERY VEHICLES

Any vehicle used to deliver cannabis must have a secure, locked storage compartment located within the vehicle. When required by State and Local guidelines, cannabis product will be

delivered in refrigerated vehicles.

The Delivery Manager will ensure the delivery vehicle is compliant prior to authorizing a delivery and:

- The loading and unloading of cannabis products into and from delivery vehicles will be performed in a secure, enclosed area that is out of public view.
- All vehicles used to delivery cannabis are equipped with a secure lock box or locking cargo area. The lock box must not be visible from the outside of the delivery vehicle.
- All vehicles used for delivery of cannabis does not bear any markings that indicate the vehicle is being used to deliver cannabis, or that indicates the Buttercup & Spring name.
- All vehicles delivering perishable cannabis products have temperature-controlled storage units.
- Each vehicle used for delivery of cannabis has a GPS monitoring device that is monitored by the Delivery Manager during delivery
- Motor vehicle insurance will encompass claims arising out of ownership, maintenance, and operation of motor vehicles by Buttercup & Spring or its employees acting in the course and scope of their employment with Buttercup & Spring. Coverage will include collision, liability, comprehensive, and medical payment.
- [REDACTED]
- [REDACTED]
- [REDACTED]

TWO-WAY COMMUNICATION

Each delivery vehicle will be equipped with two-way communication equipment, a cell phone or radio. The Delivery Manager will ensure the communication equipment is operational before any deliveries are made and that each agent who deliveries cannabis products is appropriately trained in the use of communication equipment. Employees will adhere to the following procedures communicating with Buttercup & Spring:

- The delivering vehicle will check-in with Buttercup & Spring [REDACTED] the Delivery Manager or designee shall copy transmissions. [REDACTED]
- Any Manager or employee designee receiving a [REDACTED] must notify authorities immediately of vehicle location, occupants, and contents.

- If any suspicious activity occurs during delivery, the delivery person(s) will use the communication equipment or cell phone to report all details to Buttercup & Spring.
- If communication fails for any reason, the employee will immediately contact the Delivery Manager by cell phone or landline phone.

DELIVERY REPORTING

The General Manager shall be responsible for reporting all delivery/delivery events, which will be recorded in the Delivery Log, including the start and end time of a delivery and any deviation from the delivery plan. In the event of an emergency stop, a detailed report will be recorded in the Delivery Log describing the reason for the stop, the duration, location, and any activities of personnel exiting the vehicle.

Delivery staff will immediately report any accidents, product thefts, losses, or unusual occurrences to the Delivery Manager, who in turn will report any such occurrences to the General Manger immediately. Reports shall be entered in the Delivery Log and made available for review by the state or law enforcement upon request.

The General Manager will immediately report to local law enforcement any diversions, losses, or other reportable incidents that occur during delivery, immediately including:

- Discrepancies identified during inventory, diversion, theft, loss, and/or criminal actions in delivery operations
- Any suspicious act involving delivery of cannabis by any person
- Unauthorized destruction of cannabis during delivery
- Any loss or unauthorized alteration of records related to cannabis delivery.
- Any other breach of security

THREAT LEVELS

The General Manager and Security Manager will work with local law enforcement and third-party security advisors to identify security threats.

CARGO THEFT PREVENTION MEASURES

The Delivery Manager shall employ best practices updated as often as necessary to mitigate cargo theft risk. Cargo theft prevention measures include without limitation:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

The Delivery Manager will ensure the communication equipment is checked and operational before all deliveries are made and that each agent who delivers marijuana is appropriately trained in the use of communication equipment. Delivery personnel will adhere to the following procedures for communicating with Buttercup & Spring:

- 1) [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

In the event of a delivery vehicle breakdown or accident where cannabis products are present, the following protocols will be followed:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

The delivery team will complete a detailed report of the delivery breakdown. Reports shall be entered in the Delivery Event Log and made available for review by Division or law enforcement upon request.

REPORTING

All Buttercup & Spring employees are required to immediately report any of the following incidents to the General Manager, who in-turn will report the incidents to the Bureau and County Police Department, the Security Manager and any other appropriate authority. The Security Manager will initiate an investigation into all incidents and forward a report to the General Manager upon completion. Incidents that require an investigation and mandatory reporting to the Bureau and the County Police Department include, but are not limited to:

- Significant discrepancies identified during inventory. (The level of significance shall be determined by the bureau).
- Diversion, theft, loss, or any criminal activity involving the dispensary or any agent or employee of the dispensary.

- The loss or unauthorized alteration of records related to cannabis, registered qualifying patients, primary caregivers, or dispensary employees or agents.
- Any other breach of security.

All documented reports of loss or theft must be reported to the appropriate authority and maintained for at least five (5) years after. The General Manager shall ensure copies are provided to the appropriate authorities upon request.

TRAINING

SECURITY TRAINING

Buttercup & Spring's success and longevity are directly tied to the overarching goal; to exemplify and maintain a culture of safety and security for the community, our employees and visitors. To assist in accomplishing this, staff trainings, focused on universal and timeless concepts, will be mandatory for all staff. The trainings encourage staff to dialogue on ethics, values, principles and how they relate to ethics, personal and professional integrity. Other concepts include suspension of assumptions, blame vs. accountability, and the power of choice.

Buttercup & Spring believes that understanding and accepting personal responsibility will empower staff to do their work with integrity, to think ethically and report internal theft, suspicious incidents and criminal activity without hesitation.

All security team members and employees will receive comprehensive security training in accordance with the Buttercup & Spring security plan. The Security Manager is responsible for on-going security training with employees. Prior to commencing their duties, each employee will be trained on the following:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

FIRST-AID TRAINING

All Buttercup & Spring employees and security staff will receive mandatory first-aid training, including certified American Red Cross First-Aid, CPR and AED courses. The training will be conducted by a certified American Red Cross provider. Staff will receive recertification training every two years as mandated by the American Red Cross. The Security Manager will ensure the placement of all First-Aid, CPR and AED equipment within the facility follow industry standards. Safety policies and procedures will outline response protocols in the event of an accident or injury, as well as the protocols for servicing first-aid equipment.

COMMUNITY PARTNERSHIPS

Buttercup & Spring will maintain professional partnerships with local law enforcement and emergency response agencies, allowing access to the facility as required by law and Buttercup & Spring policy. The Security Manager will maintain a list of non-emergency police department and emergency response agency contacts and ensure it is posted in plain view of staff and updated accordingly. The Security Manager will engage these agencies to foster support of the company's security plan by:

- Reporting all crimes and suspicious activities
- Sharing all industry related information relative to cannabis safety and security
- Seeking collaborative training opportunities and training exercises with emergency response instructors, if possible, to rehearse responses to critical incidents and de-escalation techniques
- Providing the emergency response community with opportunities to review Buttercup & Spring security protocols and equipment for feedback on best security practices and potential collaboration of resources

4. EMPLOYEE ID BADGES- the following section describes how the company will comply with the employee badge requirement in section 5043 of the BCC regulation.

All agents, officers, or other persons acting for or employed by you must display a laminated or plastic-coated identification badge issued by the licensee at all times while engaging in commercial cannabis activity. The identification badge shall, at a minimum, include:

- DBA
- License number
- Employee's first name;
- Employee number exclusively assigned to that employee for identification purposes; and
- Color photograph of the employee that clearly shows the full front of the employee's face and that is at least 1 inch in width and 1.5 inches in height.

5. VIDEO SURVEILLANCE- The following section describes the video surveillance system.

Video cameras will be installed and monitored by [REDACTED] who shall be notified in the event of a breach in security and/or malfunction in the system so that the event or malfunctions may be addressed in real time. The video surveillance system will be maintained by a licensed contractor who will perform regularly scheduled maintenance visits to ensure the system is always in proper working order. The surveillance system record and maintain a minimum of ninety (90) days of continuous digital recording capability and in a format approved by the state. Video surveillance will operate 24 hours per day, 7 days per week covering all storage areas, entry and exit doors, all windows, and any other areas necessary to provide comprehensive coverage.

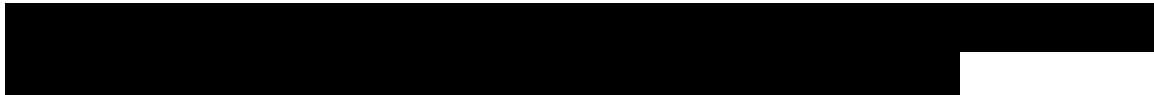
All surveillance recordings will be in a format that ensures authentication and guarantees no alteration of recorded footage.

Video cameras shall be placed in all areas that may contain cannabis; at all points of entry and exit, and in any parking lot, which shall be appropriate for the normal day and night lighting conditions of areas under surveillance.

Cameras shall be directed at all safes, vaults, and areas where cannabis is processed, prepared, stored, or handled.

Cameras shall be angled so as to allow for the capture of clear identification of any person entering or exiting the facility or area.

Video cameras shall have a recording resolution of at least 1280×720 pixel, as required by State regulations.



Twenty-four-hour recordings from all video cameras that are available for immediate viewing by the County and State representatives upon request and that are retained for at least 90 calendar days.

Recordings shall:

- Not be destroyed or altered and shall be retained as long as necessary if the facility is aware of a pending criminal, civil, or administrative investigation, or legal proceeding for which the recording may contain relevant information.
- Have the ability to immediately produce a clear, color, still photo (live or recorded).
- Have a date and time stamp embedded on all recordings. The date and time shall be synchronized and set correctly and shall not significantly obscure the picture.
- Video cameras and recording equipment shall have the ability to remain operational during a power outage with sufficient battery backup to support at least 5 minutes of recording.
- A video recording that allows for the exporting of still images in an industry standard image format, including .jpg, .bmp, and .gif.

- Exported video shall have the ability to be archived in a proprietary format that ensures authentication of the video and guarantees that no alteration of the recorded image has taken place.
- Exported video shall also have the ability to be saved in an industry standard file format that can be played on a standard computer operating system.
- A CIF resolution quality recording at a minimum of 15 frames per second and will be archived and available for inspection for an additional ninety (90) days.
- All recordings shall be erased or destroyed prior to disposal.

6. SECURITY STAFF CONT.- The following section provides additional information regarding the security provider and their personnel

[REDACTED] shall be contracted to provide Security Services including personnel. [REDACTED] requested information is as follows:

[REDACTED]

Security Personnel shall be stationed in the security room and shall make regular roving patrols of the interior and exterior to ensure the entire premises is regularly patrolled.

Security Personnel shall be onsite during regular business hours and shall be unarmed.

7. SECURITY ALARM SYSTEM- Please see the above section “**2&7. SECURITY ALARM SYSTEM-**”, for a complete description of the company’s security alarm system.

Training Procedures

Following are Buttercup & Spring's training procedures per category as requested in the MCDOR Site Review Submittal Guide for your use and review. All the trainings listed below are conducted by the managers of the respective roles. Each employee is tested on their knowledge of the given discipline and must receive a passing score before they are allowed to assume the given role and its responsibilities. Finally, all employees work is double checked by their managers to ensure compliance with Buttercup & Spring's procedures.

1. SECURITY TRAINING

Buttercup & Spring's success and longevity are directly tied to our overarching goal; to exemplify and maintain a culture of safety and security for the community, our employees and visitors. To assist in accomplishing this, staff trainings, focused on universal and timeless concepts, will be mandatory for all staff. The trainings encourage staff to dialogue on ethics, values, principles and how they relate to ethics, personal and professional integrity. Other concepts include suspension of assumptions, blame vs. accountability, and the power of choice.

Buttercup & Spring believes that understanding and accepting personal responsibility will empower staff to do their work with integrity, to think ethically and report internal theft, suspicious incidents and criminal activity without hesitation.

All security team members and employees will receive comprehensive security training in accordance with the Buttercup & Spring Security Plan. The Security Manager is responsible for on-going security training with employees. Prior to commencing their duties, each employee will be trained on the following:

The proper use of security measures and controls for the prevention of robbery, theft and violence.

Personal Protection.

Procedures and instructions for responding to an emergency.

The immediate reporting of any suspicious activity or security concerns to their supervisor as a condition of employment.

FIRST-AID TRAINING

All Buttercup & Spring employees and security staff will receive mandatory first-aid training, including certified American Red Cross First-Aid, CPR and AED courses. The training will be conducted by a certified American Red Cross provider. Staff will receive recertification training every two years as mandated by the American Red Cross. The Security Manager will ensure the placement of all First-Aid, CPR and AED equipment within the facility follow industry standards. Safety policies and procedures will outline response protocols in the event of an accident or injury, as well as the protocols for servicing first-aid equipment.

2. INVENTORY TRAINING

Inventory Clerks are trained for the following processes:

-POS Training:

Creating Product
Accepting Manifests
Inputting Test Results
Destruction
Exchanges
Sales

-Intaking product (what records are required)

-Managing Inventory and Inventory Storage Room organization

-Performing Reconciliations

3. QUALITY CONTROL TRAINING

As noted in our Non-Laboratory Quality Control Procedures, Inventory Clerks shall be trained to verify all the packaging and labeling contents and requirements as noted in their respective checklists, enclosed.

4. DELIVERY TRAINING

Delivery employees are provided with all applicable regulations and associated definitions, a folder that breaks down all items used for delivery and an SOP outlining the process from start to finish containing three roles: the driver, the packager, and the patron. The automation behind the process is included in this SOP as well. They are then trained one on one; start to finish on each technology platform, the process and procedure for two full shifts.