APPENDIX A

Building Design

SCOPE OF WORK

SPECIAL INSPECTIONS

DEFERRED SUBMITTAL ITEMS

CODE COMPLIANCE

CONSTRUCTION	EXISTING TYPE V-A, 1 HR RATED STEEL, NEW SPRINKLERS TRUSS ROOF, 1 HR SEPARATIONS PER PLAN
CODE COMPLIANCE	2016 CALIF. BLDG. CODE WHICH ADOPTS 2015 IBC, CFC 2016, 2016 CMC, 2016 CPC AND 2016 CEC.
OCCUPANCY	F-1 PRODUCTION/ B- OFFICE
ZONED	INDUSTRIAL / COMMERCIAL USE
JURISDICTION	MONO COUNTY BLD'G DEPT. 760.924.1809/ BRENT CALLOWAY- PERMIT PROCESSING

LEGAL DESCRIPTION

Lot 4 Sierra Business Park
ASSESSOR PARCEL NUMBER: 037.260.004.0000
474 Industrial Circle
Mammoth Lakes, CA. 93546

OWNER

GREEN TEAM HOLDING, LLC
413 Pipes Ln.
Encinitas, CA. 92024
PH. 858.395.4384
Contact: BRIAN HERMAN

DESIGNER

DESIGN DIMENSION ASSOC., INC.
CRAIG TAPLEY/ DESIGNER
PO BOX 7193
MAMMOTH LAKES, CA. 93546
760.934.4348

ENGINEER

DESIGN DIMENSION ASSOC., INC.
JEFFREY PRITCHETT, PE.
208 PEPERELL CT.
VACAVILLE, CA. 95688
CL 707.567.1006

PARKING REQUIREMENTS

PROPOSED BUILDINGS 21,710 SQ.FT. — PROVIDED - 13 REG. SPACES; GUEST - 2 REG. SPACES; HANDICAP - 1 ADA/ACCESS

WAREHOUSE CULTIVATION FACILITY WITH MAXIMUM 10 EMPLOEE'S.

TOTAL PARKING PROVIDED	14 REGULAR SPACES
ADA PARKING PROVIDED	1 VAN ASSEC. SPACE

NOTE: ALL PARKING IS REFLECTED AS REQUIRED FOR ACTUAL "15" EMPLOYEES.
THE PARKING SPACES PROVIDED ARE STRICTLY FOR EMPLOYEES NO PUBLIC SALES ON SITE.
ALL SPACES PROVIDED ARE INTENDED FOR EMPLOYEES WITH
2 ADDITIONAL GUEST SPACES AND 1- ADA STANDARD SPACE.

COVERAGE ANALYSIS

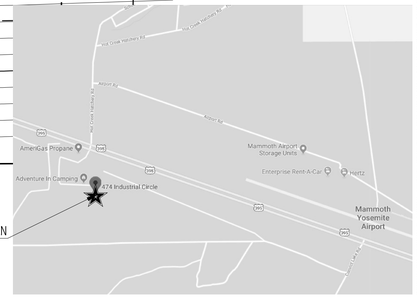
TOTAL LOT AREA	100%	50,421	SQ.FT.
ALLOWABLE COVERED AREA	80%	40,336.8	SQ.FT.
PROPOSED BUILDING AREA/ FOOTPRINT		19,787	SQ.FT.
PROPOSED PAVED/PARKING & DRIVE AREA		9,791	SQ.FT.
ACTUAL COVERED TOTAL AREA	58.7%	29,578	SQ.FT.
SNOW STORAGE (9,791 x .25)		2,448	SQ.FT.
ACTUAL STORAGE PROVIDED		4,169	SQ.FT.
COMPLETE SLOPE			

SNOW STORAGE 1,838 SQ.FT.
SNOW STORAGE 1,509 SQ.FT.
SNOW STORAGE
SPACES
EASEMENT #2 PER TRACT MAP 10' LANDSCAPE, SNOW STORAGE, & UTILITY
EASEMENT #2 PER TRACT MAP 30' PERIMETER MAINTENANCE ZONE
30' PERIMETER MAINTENANCE ZONE EASEMENT LINE EASEMENT #1, MB 10/79
40' PERIMETER MAINTENANCE ZONE EASEMENT LINE, EASEMENT #1, MB10/79
SCE TRANSFORMER CONC. PAD
GENERAC GENERATOR
ISCE & VERIZON UTILITY BOXES
CURB AND GUTTER
ELEVATION
TRASH ENCLOSURE
PROPANE TANK
CONSTRUCT WATER RETENTION SYSTEM UNDER PAVING- FUTURE MODEL TO BE ITEMIZED
3" X20' LEACH INFILTRATORS FUTURE MODEL TO BE ITEMIZED
ORENCO AX20RT- TREATMENT UNIT FUTURE MODEL TO BE ITEMIZED
SEPTIC TANK -IM1060 W/ ORENCO-NIO TUBE EFFLUENT FILTER F10822-14B-
4" Ø SEWER LATERAL
ADA AISLE
30'-0" SETBACK
20'-0" SETBACK
10'-0" SETBACK
40'-0" SETBACK
31'-0 9/16"
156'-7"
S1°11'48"W 206.65' (M)
S1°12'50"W, 206.65'(R)
L=141' R=60' (M)
L=138' R=60' (R)
D=42°22'47" (M)
D=42°22'47" (R)
S88°47'10"E 136.40'
264.06'
N00°18'38"W
SPACES 15, 14, 13, 12, 11, 10, 9, 8, 7, 6, 5, 4, 3, 2, 1
SNOW STORAGE
ADA
A A4.0
B A4.0
C 4.0

SITE PLAN (LOT 4)

SCALE: 1"=10'-0"

N



PROJECT LOCATION

DESIGN DIMENSION ASSOCIATES
DESIGN PLANNING STRUCTURES
P.O. BOX 7193
MAMMOTH LAKES, CA. 93546
TEL/FAX (760) 934-4348

SITE PLAN / ROOF PLAN COVER INFORMATION

GREEN TEAM HOLDING, LLC - GROW FACILITY

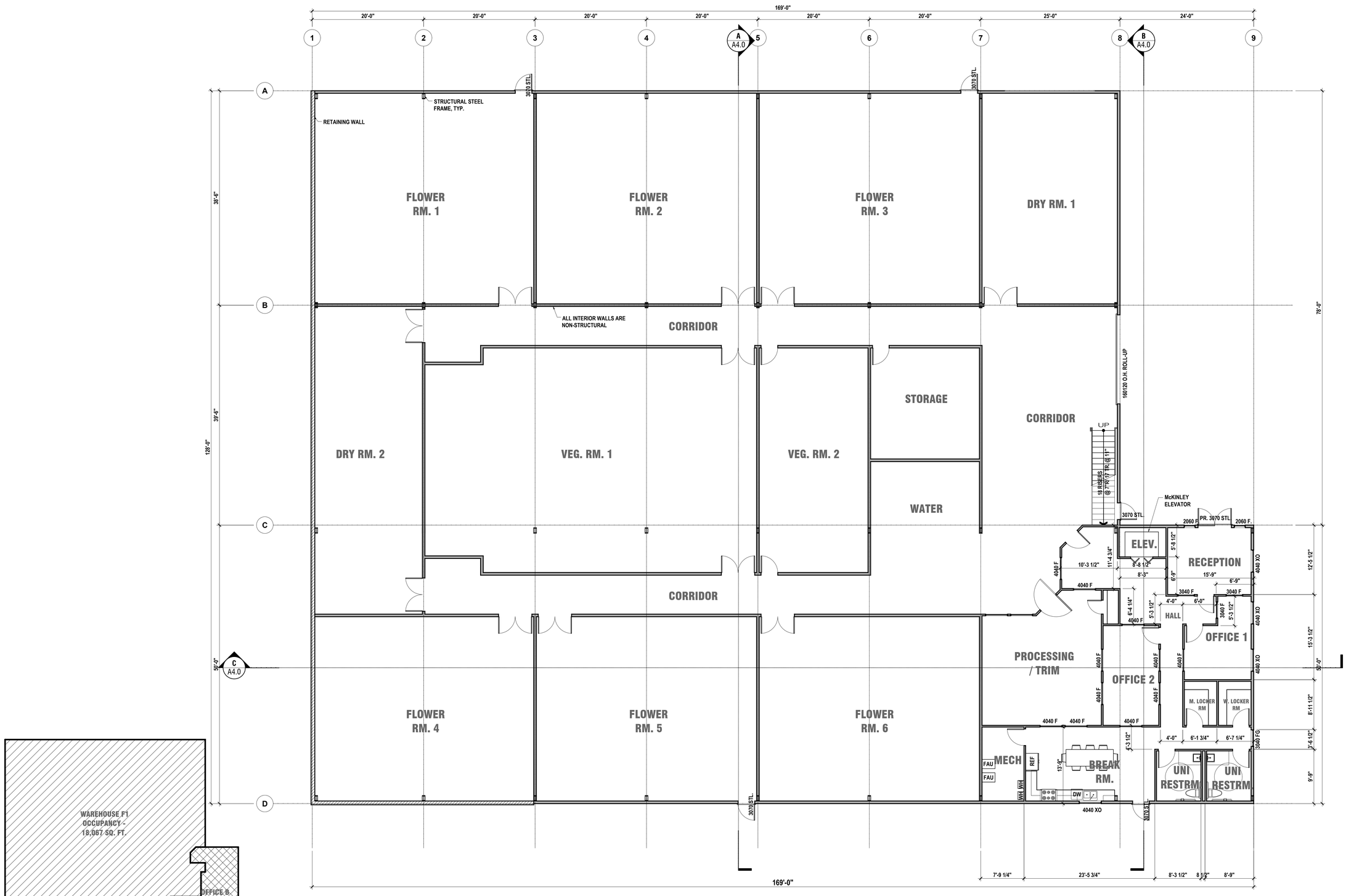
CONTACT: BRIAN HERMAN
PH. 858.395.4384

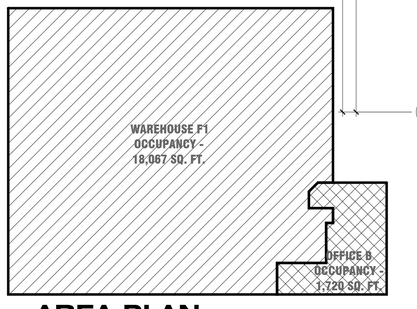
CONTACT ADDRESS: 413 Pipes Ln. Encinitas, CA. 92024

PROJECT ADDRESS: Lot 4 Sierra Business Park 474 Industrial Circle Mammoth Lakes, CA 93546
APN: 037.260.004.0000

REVISIONS

AUG. 2018
SCALE:
DRAWN: CWT/CJO
PRINTED: 6.05.19
SHEET
A1.0





AREA PLAN

SCALE 1/32"=1'-0"

WALL LEGEND

- PROPOSED FRAME WALLS
- PROPOSED RETAINING WALLS

PROPOSED GROUND FLOOR PLAN SCHEME 3

SCALE 1/8"=1'-0"

Area Calcs

WAREHOUSE (F1):	=	**18,067 SQ. FT.**
OFFICES (B):	=	**1,720 SQ. FT.**
GROUND FLOOR CONDITIONED AREA:	=	**19,787 SQ. FT.**

DESIGN DIMENSION ASSOCIATES
DESIGN PLANNING STRUCTURES
P.O. BOX 7193
MAMMOTH LAKES, CA. 93546
TEL/FAX (760) 934-4348

PROPOSED GROUND FLOOR PLAN

GREEN TEAM HOLDING, LLC - GROW FACILITY

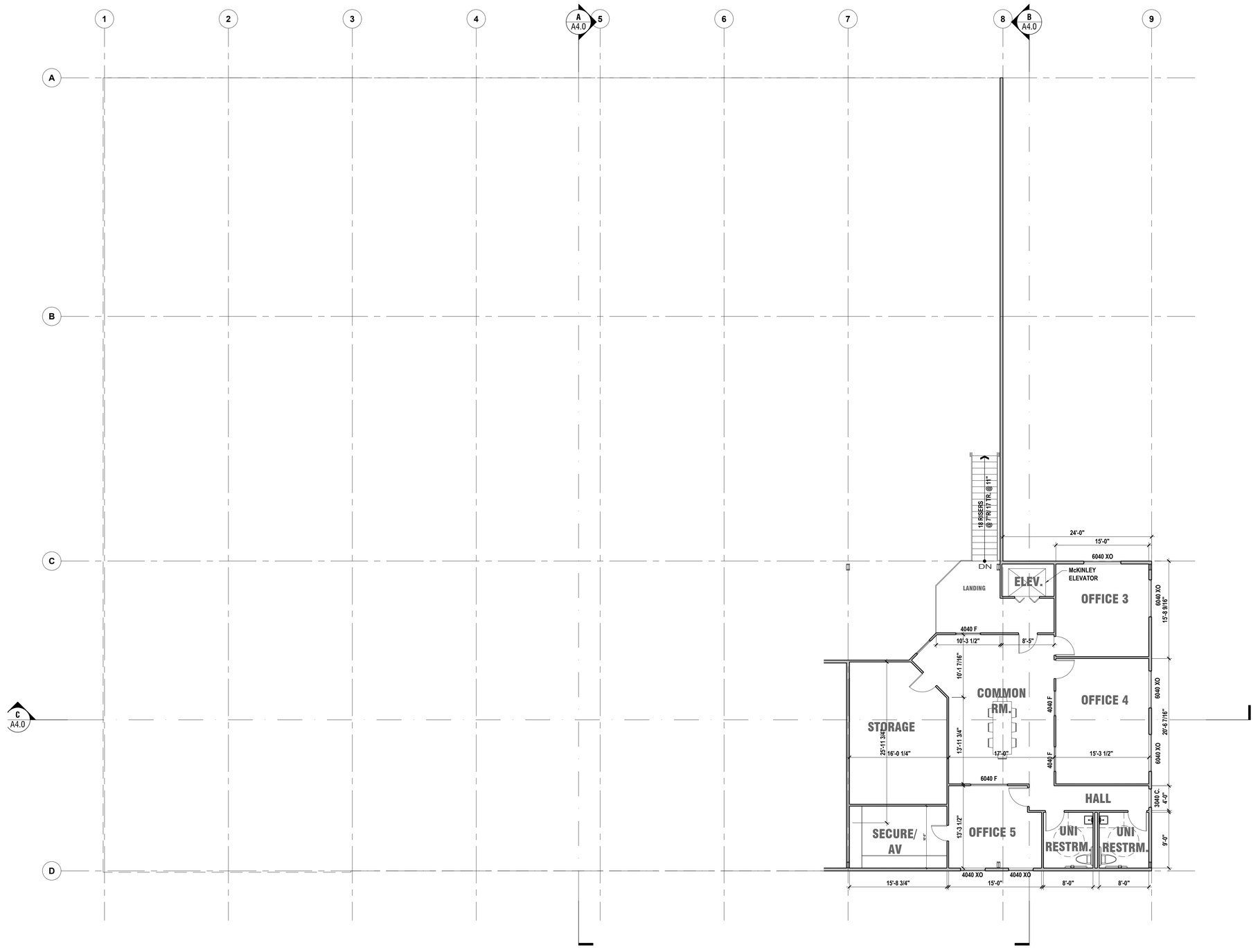
CONTACT: BRIAN HERMAN
PH. 858.395.4384

CONTACT ADDRESS:
413 Pipes Ln.
Encinitas, CA. 92024

PROJECT ADDRESS:
Lot 4 Sierra Business Park
474 Industrial Circle
Mammoth Lakes, CA 93546
APN: 037.260.004.0000

REVISIONS

AUG. 2018
SCALE:
DRAWN: CWT/CJO
PRINTED: 5.17.19
SHEET
A3.0



WALL LEGEND

PROPOSED WOOD FRAME WALLS

PROPOSED SECOND FLOOR PLAN SCHEME 3

SCALE 1/8"=1'-0"

Area Calcs

OFFICES (B): = **2,071 SQ. FT.**

DESIGN DIMENSION ASSOCIATES
DESIGN PLANNING STRUCTURES
P.O. BOX 7193
MAMMOTH LAKES, CA. 93546
TEL/FAX (760) 934-4348

PROPOSED SECOND FLOOR PLAN

GREEN TEAM HOLDING, LLC - GROW FACILITY

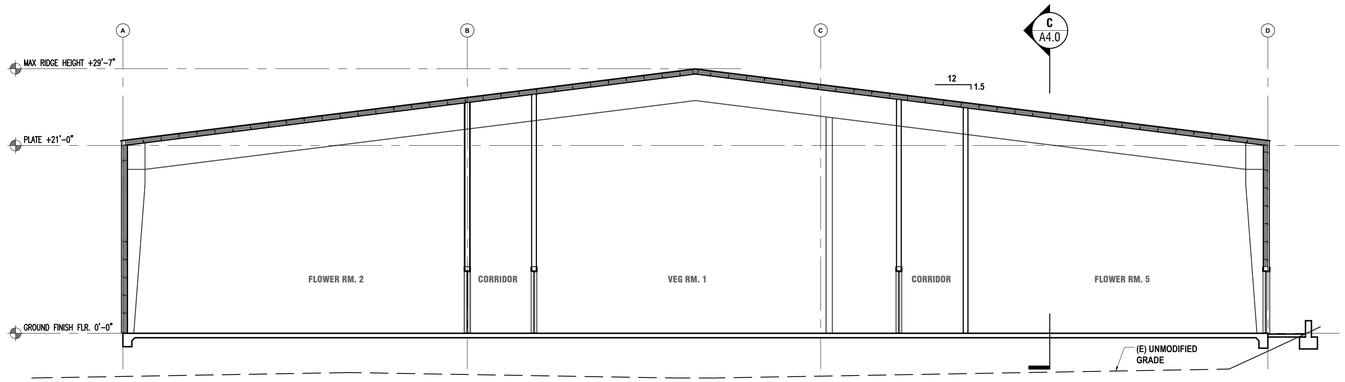
CONTACT: BRIAN HERMAN
PH. 858.395.4384

CONTACT ADDRESS: 413 Pipes Ln. Encinitas, CA. 92024

PROJECT ADDRESS: Lot 4 Sierra Business Park 474 Industrial Circle Mammoth Lakes, CA 93546
APN: 037.260.004.0000

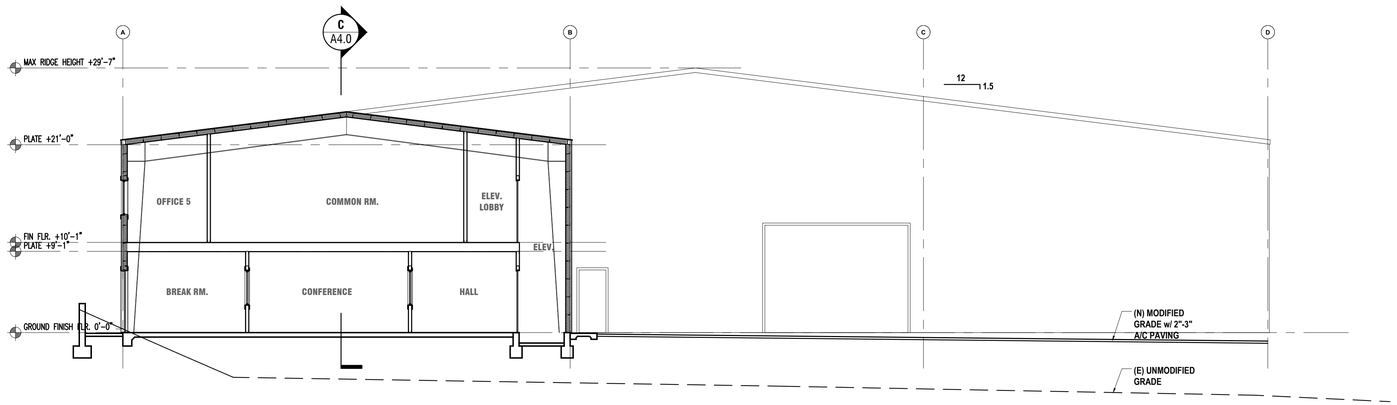
REVISIONS

AUG. 2018
SCALE:
DRAWN: CWT/CJO
PRINTED: 5.17.19
SHEET
A3.1



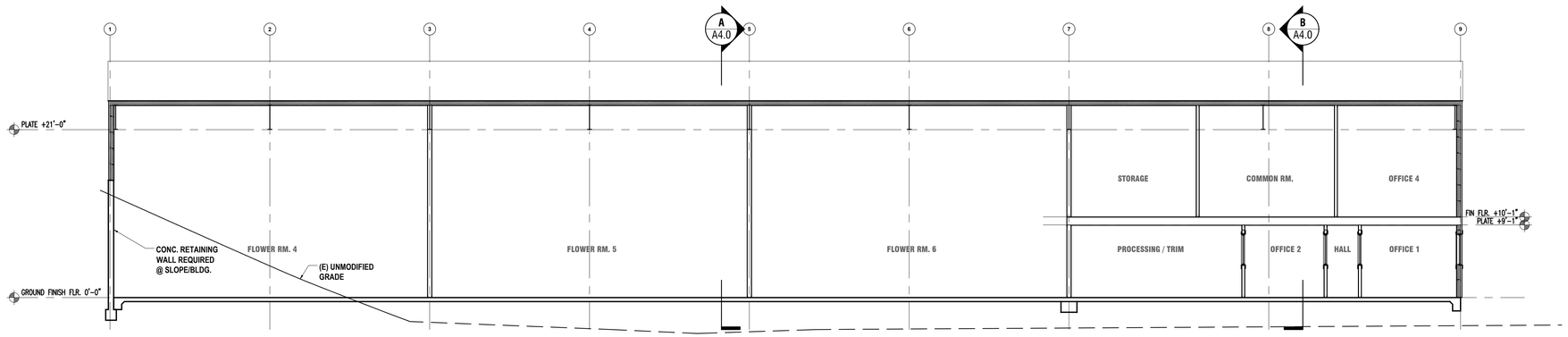
PROPOSED SECTION A

SCALE 1/8"=1'-0"



PROPOSED SECTION B

SCALE 1/8"=1'-0"



PROPOSED SECTION C

SCALE 1/8"=1'-0"

DESIGN DIMENSION ASSOCIATES
DESIGN PLANNING STRUCTURES
P.O. BOX 7193
MAMMOTH LAKES, CA. 93546
TEL/FAX (760) 934-4348

PROPOSED BUILDING SECTIONS; A, B & C

GREEN TEAM HOLDING, LLC - GROW FACILITY

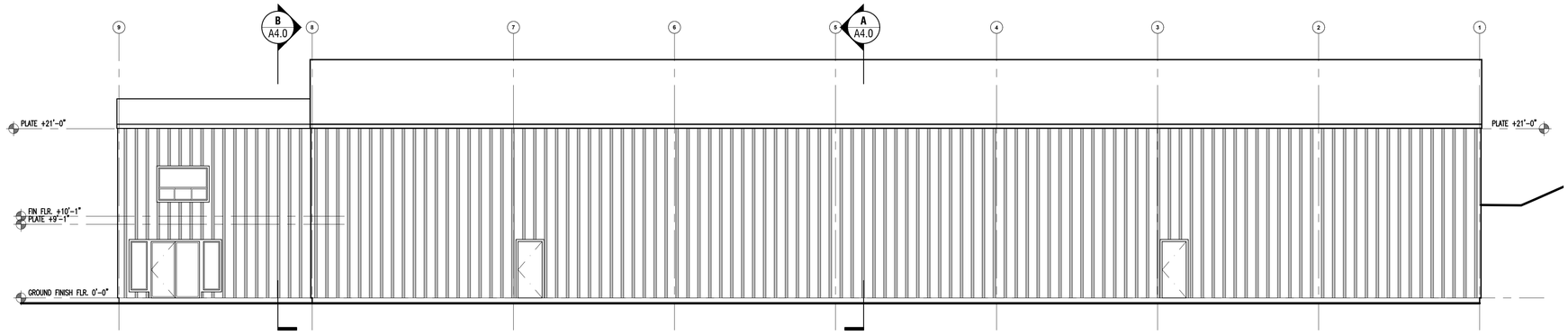
CONTACT: BRIAN HERMAN
PH. 858.395.4384

CONTACT ADDRESS:
413 Pipes Ln.
Encinitas, CA. 92024

PROJECT ADDRESS:
Lot 4 Sierra Business Park
APN: 037.260.004.0000
47 Industrial Loop Rd.
Mammoth Lakes, CA 93546

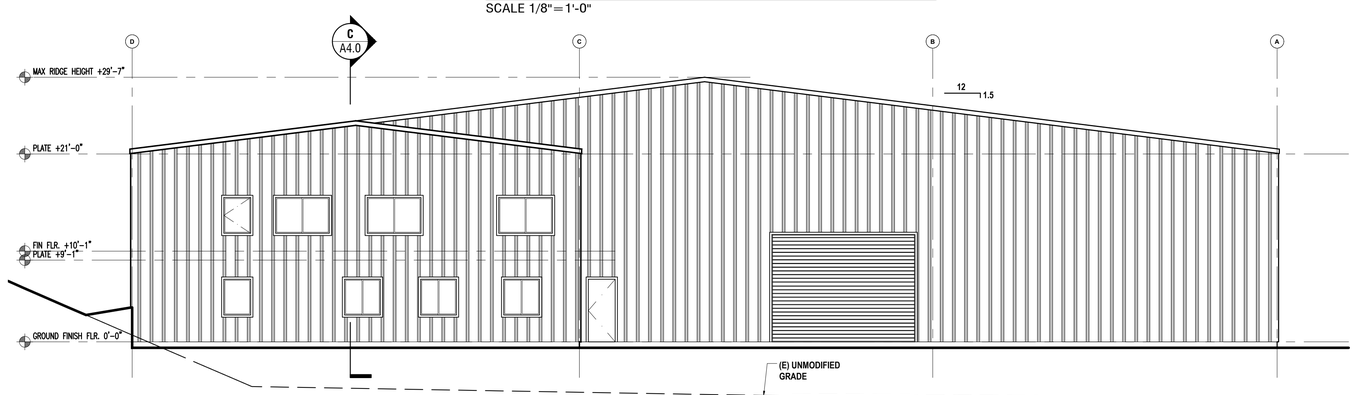
REVISIONS

AUG. 2018
SCALE:
DRAWN: CWT/CJO
PRINTED: 05.17.19
SHEET
A4.0



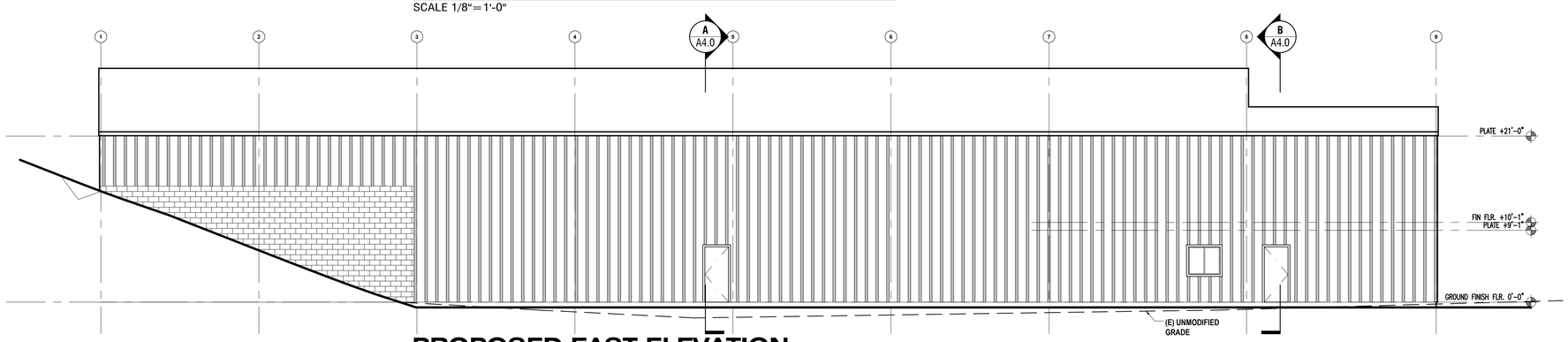
PROPOSED WEST ELEVATION

SCALE 1/8"=1'-0"



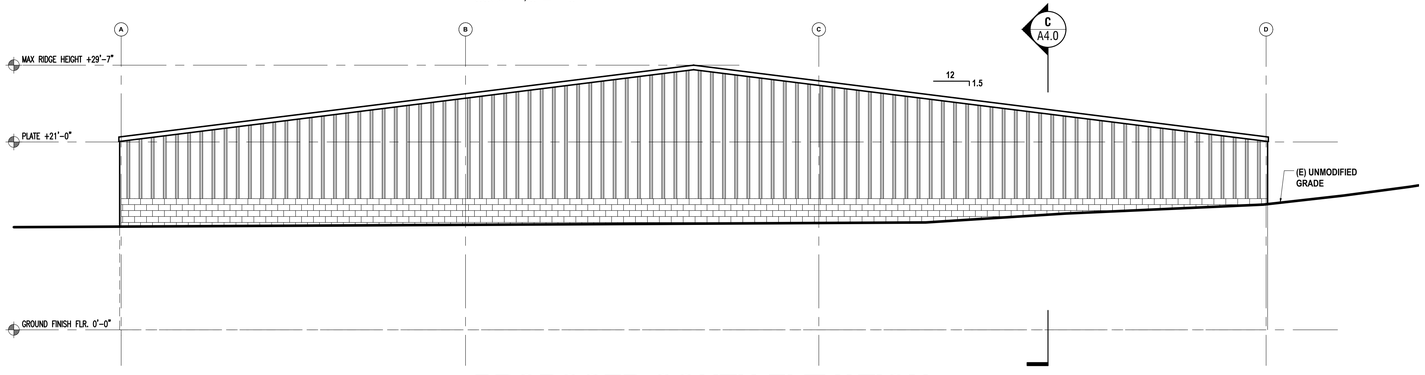
PROPOSED NORTH ELEVATION

SCALE 1/8"=1'-0"



PROPOSED EAST ELEVATION

SCALE 1/8"=1'-0"



PROPOSED SOUTH ELEVATION

SCALE 1/8"=1'-0"

DESIGN DIMENSION ASSOCIATES
DESIGN PLANNING STRUCTURES
P.O. BOX 7193
MAMMOTH LAKES, CA. 93546
TEL/FAX (760) 934-4348

PROPOSED EXTERIOR ELEVATIONS

GREEN TEAM HOLDING, LLC - GROW FACILITY

CONTACT: BRIAN HERMAN
PH. 858.395.4384

CONTACT ADDRESS:
413 Pipes Ln.
Encinitas, CA. 92024

PROJECT ADDRESS:
Lot 4 Sierra Business Park
247 Industrial Circle
Mammoth Lakes, CA 93546
APN: 037.260.004.0000

REVISIONS

AUG. 2018
SCALE:
DRAWN: CWT/CJO
PRINTED: 05.17.19
SHEET
A5.0

APPENDIX B

Operating Plan

MEDICINE MAN
TECHNOLOGIES

Cultivation Operating Plan Table of Contents

MEDICINE MAN
TECHNOLOGIES

Cultivation Operations Timeline

Activity	*Target Date*
Application Process	
CDFA CalCannabis ("State") application submittal	
State cultivation license awarded	
Submit State annual license fee	
Buildout Activities	
Building permit applications submitted	
Construction permits finalized	
Construction	
Order building materials	
Begin installing concrete floor, drains, utilities	
Steel framing arrives and ready for installation	
Steel skins arrive and ready for installation	
Order lights, a/c units, dehumidification units, water tank, grow tables	
Buildout interior cultivation rooms	
Engineers, electricians, plumbers	
Install interior/exterior security equipment/systems	
Install remaining units, equipment, and grow tables	
Notify the State of intent to commence operations	
Building Inspection and Approval	
Certificate of Occupancy issued	
Finalize Cultivation Operational Plans	
Inventory control procedures	
Recordkeeping procedures and data storage	
Workplace safety measures	
Employment policies and procedures	
Recall plan, including identification all affected plants/products	
Packaging and labeling	
Cultivation methods	
Waste disposal management	
Quality control plan	
Storage of cannabis flower and packages	
Security and transportation procedures	

Bask Ventures, Inc. has engaged with certain premier consultants to advise and assist with the physical build out as well as Bask Ventures, Inc.'s plan of operations to customize their existing documentation to the facility and State regulations.	
Cultivation Consultant – Medicine Man Technologies	
Become Fully Operational	

Cultivation Activities	
Research sources for procuring cannabis genetics	
Implement California Cannabis Track and Trace System, METRC (CCTT)	
Implementation training with system provider and consultant team	
Cultivation Consultant Conducts Key Staff Training	
Commence initial training program for key cultivation employees and management. MMT, Bask Ventures, Inc.'s selected cultivation consultant, has an established comprehensive training program for cultivation employees through immersion in Medicine Man's facility and working directly in an operational grow.	
Facility safety and sanitation, including OSHA standards	
Employee hygiene standards	
Inventory control protocols including inventory tracking system utilization	
Diversion prevention safeguards	
Security and emergency protocols	
Facility environmental control systems	
Facility automated monitoring systems	
Proprietary cultivation methods	
California Department of Pesticide Regulation private applicator certification	
Maintenance and quality control	
Trimming, drying, curing, and storage procedures including the meticulous tracking of inventory via inventory tracking system throughout the process	
Order Cultivation Supplies	
Plant tracking tags	
Employee uniforms	
Specialized HPS light resistant sunglasses	

Nutrients, PPM meters, pH meters, grow media, measuring devices, gloves, scissors, watering pumps wands and hoses, netting	
Cloning supplies	
Pallet jacks and maintenance equipment	
Trim machines, scales, hearing and eye protection, drying racks, curing and storage containers,	
Integrated Pest Management products	
Source Genetics and Become Operational	
Bask Ventures, Inc. will track all incoming genetics in accordance with the rules and regulations	
Medicine Man Technologies will be present to oversee the tracking and implementation of cultivation methods.	

The following is a list of key employees to be hired during the initial deployment period prior to commencing operations:

- CFO
- COO
- Human Resource Specialist
- Accountant
- Management– General / Cultivation / Security / Inventory / Quality Assurance
- Legal Counsel
- Marketing and Sales
- Cultivation Staff

Cultivation Facility Layout

The foundation for a safe, secure, contaminant-free, and successful cultivation begins with proper facility design. Commercial cannabis cultivation blends the art of agricultural production with controlled manufacturing to maximize the output and consistent reproduction of high-quality products. To achieve this, a facility must support a practical, safe, organized work-flow design and possess the appropriate space and environmental controls to efficiently and safely carry out numerous cultivation-related tasks.

Facility Design

When building a new facility, infrastructure must be considered when planning the layout of the cultivation space. The most commonly considered site-sufficiency factors are: the condition of the building foundation, interior clear-height, interior column spacing, the presence of sprinklers, sufficient drainage, life-safety factors/features, and access points for critical utilities, including power, water, and gas. These factors will influence the square-footage and height of individual rooms, the placement of cultivation-related equipment, such as tables, racks, and lights, and the placement of mechanical, electrical, and plumbing equipment/gear throughout the facility.

Pursuant to 3 CCR § 8106 and 16 CCR § 5502, *Cultivation Plan Requirements*, Bask Ventures, Inc. has developed a cultivation plan that includes a detailed diagram of the premises showing all boundaries and dimensions in feet to scale of the canopy areas containing mature plants, at any point in time including aggregate square footage. The canopy is calculated in square feet and measured to include all clearly identifiable boundaries between areas that contain mature plants at any point in time, including the spaces within boundaries. For mature plants being cultivated using a shelving system, the surface area of each shelf level is included in the total canopy calculation. Each unique area included in the total canopy calculation is separated by an identifiable boundary including, for example, interior walls, shelves, greenhouse walls, hoop house walls, garden benches, hedgerows, fencing, garden beds, and garden plots.

The plan also details areas outside of the canopy where immature plants are maintained; designated pesticide and other agricultural chemical storage areas; designated processing, packaging, and secure waste disposal areas, including composting areas; designated areas for harvested cannabis storage; designated research and development areas containing mature plants for nursery; and designated seed production areas containing mature plants for nursery.

A lighting diagram showing the location of all lights in the canopy areas and the maximum wattage (or wattage equivalent) of each light is also included in the plan. In addition, a pest management plan detailing product names and active ingredients for any used pesticides during any stage of plant growth along with integrated pest management protocols including chemical, biological, and cultural methods used to control or prevent the introduction of pests on the cultivation site has been fully developed for implementation.

<u>Cultivation Area Design</u>

The cultivation areas will employ a customized room-in-room design to alleviate cross-contamination and the proliferation of airborne pests/pathogens. Design will incorporate independent, autonomous controls for the various utility functions (e.g., electrical, plumbing, HVAC, etc.) in each dedicated flower and vegetative (veg) room. Allowing for complete

management and remote control of individual environments, unique parameters can be set for lighting, temperature, humidity, CO_2 levels, air handling, and ventilation depending on the growth phase and individualized needs of each cultivation room.

The facility's room-in-room design will also allow Bask Ventures, Inc. to responsibly and quickly react to market forces through targeted production control. High demand will require full production, but this can be scaled back in times of low customer demand to prevent over production and preclude diversion. For example, should market conditions demand a decrease in production, Bask Ventures, Inc. may temporarily discontinue using a particular vegetative or flowering room and its associated production capacity without having to interrupt the production cycle of the other operating rooms.

Building Materials
Construction, building, and finishing materials will be selected based on their ability to support an aseptic environment for plants and a healthy workplace for employees. Bask Ventures, Inc. will limit the use of wood-fiber or other organic-surface materials for framing walls to minimize harboring pests and pathogens and to prevent rotting or deterioration under high moisture conditions. Instead, walls will be framed with metal studs and finished with a fiberglass reinforced plastic (FRP) or equivalent material that is lightweight but does not compromise durability. These USDA approved materials are reflective and resist moisture, stains, odors, and chemicals. Floors will be finished with a medical-grade epoxy or equivalent. Other finishing materials will be easily sterilized to facilitate routine sanitation and long-lasting durability.

Room Design and Environment
Each room in the facility will require a unique design and custom environment to support the function taking place within the space. In addition to individualized room layout, the equipment, including tables, racks, lighting, and HVAC are customized to maximize plant health and productivity.

Vegetative (Veg) Rooms
Typical Room Dimensions: Up to 1,200 sq. ft. with 12 ft. clear-height to ceiling.
General description: The veg rooms are designed to mimic springtime conditions, encouraging early-stage stalk and stem growth, healthy root development, and plant structure. Typically, plants can move through the early, mid, and late stages of vegetation. Lighting, feeding, and tending are adjusted over the course of vegetative growth in preparation for the flowering stage.
Table/rack description: Early veg plants will be placed on a three-tiered, stacked racking system, measuring no greater than 4'x8'. The racks are constructed of galvanized steel finished in a powder coating. Mid- and late-stage veg plants will be placed on a two-tiered, stacked racking system, measuring no greater than 4'x8'. These racks will also be constructed of galvanized steel finished in a powder coating. The racks will be affixed to the site foundation, and feature a built-in drainage system to collect runoff water and nutrients.
Lighting description: Early Veg: T5 LED fix mounted fixture hung 2-3ft above the canopy. Mid - Late Veg: Mounted and Ducted 600 -1000W Metal Halide lighting.
HVAC description: Typically, up to 20 tons of HVAC.
Temperature range: 78-81°F during light period (daytime), 70-71°F during dark period (night time).

Humidity range: 55% throughout remainder of vegetative phase.
CO_2 level range: CO_2 is kept at ambient-environment levels; no additional CO_2 is added.

Flowering Rooms
Typical Room Dimensions: Up to 1,200 sq. ft. with 12 ft. clear-height to ceiling.
General description: Flowering rooms are designed to mimic summer and fall conditions, encouraging late-stage stalk and stem growth and flower (bud) development. Flower rooms will have adequate space to allow cultivation staff to safely and efficiently maneuver around grow tables, ceiling mounted-lighting fixtures, ancillary dehumidification units, wall-mounted light ballasts, and wall-mounted circulation fans.
Table/rack description: Typically, eight plants will be placed on a single-tier table, measuring no greater than 4'x8'. The tables will be constructed of galvanized steel and finished in a powder coating. Three tables will be placed next to one another on rolling metal casters, enabling the cultivation team to move freely between them for scouting, feeding, and general tending to the plants. The tables will feature a built-in drainage system to collect runoff water and nutrients. The tables will also feature an adjustable plant support frame, or halo, to which the cultivation team can anchor a net and support the maturing plant canopy.
Lighting description: 1000W High Pressure Sodium lights placed 36-48 inches from the canopy.
HVAC description: Typically, up to 20 tons of HVAC.
Temperature range: Week 1-4: 78-81°F during daytime, 70-71°F during night time. Week 5-8: 79-83°F during daytime, 69-71°F during night time. Week 9-10: 78-82°F during daytime, 68-70°F during night time.
Humidity range: 53-57% throughout the flowering phase.
CO_2 level range: No greater than 1,500 ppm during daytime, reduce during dark period to typically 400 ppm.

Plant Work Area
Typical Space Dimensions: The plant work area is not room-based, but a common area within the building that is centrally located to facilitate transporting of raw materials.
General description: The Work Area is generally segregated into areas for mixing and handling grow media, water management, nutrient mixing, cloning plants, and storage of consumables (e.g., nutrients, pesticides, etc.).
Table/rack description: Food-grade stainless steel two-tiered work tables.
Lighting description: Energy efficient lighting will be installed in the Plant Work Area, with sufficient fixtures to achieve a minimum of 50 foot-candles of light intensity throughout the room.
Temperature range: Ambient-environment temperatures, preferably room temperature
Humidity range: Ambient-environment humidity, preferably no greater than 50%

Trim Room
Typical Room Dimensions: Capacity driven, usually no more than 500 sq. ft.
General description: Within the space is room for automated trim machines, stainless steel work tables for raw material handling, stainless steel 5-shelf racks for storing raw material, and a staging area for plant material prior to trimming.
Table/rack description: Food-grade stainless steel two-tiered work tables, stainless steel racks to hold plant waste material, trimmed buds in trays, and tight trim in trays.

Lighting description: Energy efficient lighting will be installed in the Trim Room, with sufficient fixtures to achieve a minimum of 50 foot-candles of light intensity throughout the room.
Temperature range: Ambient-environment temperatures, preferably 68°F.
Humidity range: Ambient-environment humidity, preferably no greater than 50%.

Dry Room
Typical Room Dimensions: Capacity driven, no more than 500 sq. ft.
General description: Within the space is room for several bakery style drying racks, work tables, supplemental dehumidification units, and other shelves.
Table/rack description: Food-grade, stainless steel two-tiered work tables, stainless steel drying racks to dry bud and tight trim, and stainless steel 5-shelf racks for storage of dried material.
Lighting description: Low wattage access lighting. Lights will remain off unless work is being performed in the room.
Temperature range: 69-71°F throughout the drying phase.
Humidity range: 45-50% for optimal slow-drying conditions.

Cure Room
Typical Room Dimensions: Capacity driven, typically no more than 500 sq. ft.
General description: Within the space is room for work tables and racks to hold secure cure totes (containers, buckets, etc.).
Table/rack description: Food-grade stainless steel two-tiered work tables and stainless steel 5-shelf racks for storage of cured material.
Lighting description: Low wattage access lighting. Lights will remain off unless work is being performed in the room.
Temperature range: 69-71°F throughout the curing phase.
Humidity range: 40-45% for optimal curing conditions.

Storage/Vault Rooms
Typical Room Dimensions: No more than 250 sq. ft.
General description: Within the space is room for racking to hold products ready for shipment. This room may also contain a free-standing safe weighing more than 750 lbs. (secured to the floor) and locking file cabinets.
Table/rack description: Stainless steel 5-shelf racks for storage of finished materials.
Lighting description: Low wattage access lighting. Lights will remain off unless work is being performed in the room.
Temperature range: Adjustable; dependent on finished product mix.
Humidity range: Adjustable; dependent on finished product mix.

Cultivation Weekly Operations

Monday

8am – 12pm

- Clone maintenance
- Apply appropriate pesticide/fungicide regimen
- Formulate accurate flower room nutrients
- Water scheduled flowering rooms
- Select rooted clones to be transplanted the following day (Tuesday)

1pm – 5pm

- Apply appropriate pesticide/fungicide regimen
- Formulate accurate flower room nutrients
- Water scheduled flowering rooms
- Flowering plant maintenance (scouting, netting, and defoliating)
- Clean and sanitize nutrient transport totes
- Clean and sanitize facility

Tuesday

8am – 12pm

- Clone maintenance
- Formulate vegetative plant nutrients
- Water vegetative plants
- Transplant clones
- Water clones
- Flowering plant maintenance (scouting, netting, and defoliating)
- Clean and sanitize nutrient transport totes

1pm – 5pm

- Vegetative plant maintenance (scouting, topping, and pruning)
- Flowering plant maintenance (scouting, netting, and defoliating)
- Cut clones

Wednesday

8am – 12pm

- Clone maintenance
- If needed, apply appropriate pesticide/fungicide regimen
- Formulate accurate flower room nutrients
- Water scheduled flowering rooms
- Select rooted clones to be transplanted the following day (Thursday)

1pm – 5pm

- If needed, apply appropriate pesticide/fungicide regimen
- Formulate accurate flower room nutrients
- Water scheduled flowering rooms
- Flowering plant maintenance (scouting, netting and defoliating)
- Clean and sanitize nutrient transport totes
- Clean and sanitize facility

Thursday
8am – 12pm
- Clone maintenance
- Formulate vegetative plant nutrients
- Water vegetative plants
- Transplant clones
- Water clones
- Flowering plant maintenance (scouting, netting, and defoliating)
- Clean and sanitize nutrient transport totes

1pm – 5pm
- Vegetative plant maintenance (scouting, topping, and pruning)
- Flowering plant maintenance (scouting, netting, and defoliating)

Friday
8am – 12pm
- Clone maintenance
- Formulate accurate flower room nutrients
- Water scheduled flowering rooms
- Select rooted clones to be transplanted the following day (Saturday)

1pm – 5pm
- Formulate accurate flower room nutrients
- Water scheduled flowering rooms
- Flowering plant maintenance (scouting, netting, and defoliating)
- Clean and sanitize nutrient transport totes
- Clean and sanitize facility

Saturday
8am – 12pm
- Transplant clones
- Clone maintenance
- Vegetative plant maintenance (scouting, topping, and pruning)
- Clean and sanitize morning flower rooms

1pm – 5pm
- Cut clones
- Comprehensive deep cleaning for vegetative and flowering rooms

Sunday
8am – 5pm
- Clone maintenance
- Flowering plant maintenance (scouting, netting, and defoliating)

Harvest Days
Cannabis is harvested when the Cultivation Manager deems the trichomes ripe.
- Harvest specified number of flowering plants
- Sanitize table/room, repopulate with vegetative plants
- Weigh and track each plant individually (initial weight)
- Remove fan leaves and stems
- Machine trim flowers and track weights according to state regulation.
- Transfer flower and tight trim to the drying room where they will dry for 7-10 days.

Cultivation Employee Roles, Duties, Responsibilities and Qualifications

General Manager

Role:

- The General Manager is responsible for the overseeing the overall operation of the cultivation facility.

Supervision Received:

- Ownership group, including principals and financial backers

Supervision Exercised:

- Management of all departments. Cultivation facility managers will report directly to the General Manager.

Duties and Responsibilities:

- Manages facility operations
- Participates in creating and implementing company policies; directs and coordinates departmental activities to meet business goals and objectives; ensures profitability and growth
- Reviews activities, costs, operations, and forecast-data to determine progress towards company goals and objectives
- Communicates with the Cultivation Manager, to develop, review, update, and implement business strategic planning, including sales, financial performance, and new product development
- Reviews production and operating reports to resolve any operational, manufacturing and facility complications or problems
- Oversees key projects, processes and performance reports, data and analysis
- Reviews operations and policies to better meet sales goals and to ascertain manufacturing or outsourcing requirements to develop new products and markets
- Reviews and approves accounting analyses for budgeting and implementation, production efficiency, financial reporting, and submittal of capital expenditures
- Ensures facility compliance with federal, state, and local industry rules and regulations
- Develops and communicates plans, employee evaluations and data reports to the ownership group, including principals and other financial backers
- Manages employee relations with support of administrative personnel
- Manages performance by formulating effective goals, setting targets, and key performance indicators as appropriate
- Works with the Cultivation Manager to prevent loss, diversion, and provide inventory oversight and audits
- Refines, revises, and enforces company Standard Operating Procedures
- Engages with the Quality Assurance Manager to ensure the facility maintains regulatory compliance
- Directs staff and management to ensure that production schedules are maintained
- Ensures facility compliance with local, state, and federal sanitation standards and occupational, health, and safety regulations
- Participates in continuing cultivation and general cannabis industry education and seminars to remain at the forefront of industry best-practices
- Enforces and complies with HR policies including confidentiality and non-disclosure

Qualifications:

- Minimum 5 years' managerial experience
- Strong communication skills
- Demonstrates people management skills and development capability
- Demonstrates successful leadership
- Strong organizational skills
- Proficiency in technology software, desktop electronics, MS Office (Word, Excel, Outlook, PowerPoint)
- Fluent in spoken and written English
- First aid training, OSHA training
- Highly regulated industry related experience a plus

Cultivation Manager

Role:

- This position is responsible for the direct oversight of the cultivation operations

Supervision Received:

- Reports to the General Manager

Supervision Exercised:

- Manages cultivation staff including entry level technicians and department supervisors
- Performs managerial responsibilities in accordance with the organization's policies and applicable laws including interviewing, hiring, and training employees and contractors; planning, assigning, and directing work; appraising performance; rewarding and disciplining subordinates; addressing complaints and resolving problems.
- Assists supervising all facility staff in daily operations.

Duties and Responsibilities:

- Manages all operations in the cultivation facility
- Develops and implements facility crop production plan, including nutrient management, irrigation, pest control, environmental control, and other crop-specific practices
- Develops, implements, and trains team members on techniques and practices in areas of propagation, transplanting, plant care (scouting, pruning/topping, watering/feeding, trimming, etc.) irrigation, fertilization, soils management, composting, pest management, disease detection and control, inventory controls, and equipment maintenance
- Works with the General Manager to develop cultivation and production plans; determines strains and quantities of plants to be produced; establishes cultivation goals and objectives. Manages plant scheduling and workflow to ensure that tasks are completed in a timely fashion
- Regularly inspects crops and their growing conditions to anticipate and proactively address propagation-specific issues
- Executes preventative maintenance and elimination of all types of pests and pathogens, including; mold, powdery mildew, spider mites, root aphids, fungus gnats, etc.
- Possesses and maintains expert knowledge of plant diseases, insects and fungi, as well as plant treatment options
- Continually recommends, budgets, and implements cultivation management improvements, including plans for Integrated Pest Management (IPM), seed/clone

genetics, nutrients, soil amendments, pesticides, and other relevant techniques and materials
- Communicates requirements regarding supplies and equipment, cleanliness and functionality of the facility to cultivation staff
- Maintains OSHA-level standards, organization standards, regulatory compliance and legal requirements
- Develops and maintains risk management strategies that address hazards, such as theft, diversion, tampering, power outages, or natural disasters
- Ensures the cultivation of repeatable, consistent, reliable, safe, and high-quality product commensurate with market demand
- Collaborates with HR for hiring and employment practices
- Accountable for purchases and expenses for facility-related office supplies and cultivation supplies
- Participates in continuing cultivation education and seminars
- Complies with all HR policies including confidentiality and non-disclosure
- Performs in a manner consistent with the goals and values of the company
- In the event of a voluntary or mandatory recall procedure, serves as part of the Internal Recall Team

Qualifications
- Minimum bachelor's degree in Business Management, Operations and/or Logistics, Project Management or related fields
- Minimum 5 years' experience in management or operations, proof of successful team management and leadership
- Strong communication skills with the ability to direct staff
- People management skills
- Strong organizational skills
- Proficiency in technology software, desktop electronics, MS Office (Word, Excel, Outlook, PowerPoint)

Lead Cultivation Agent

Role:
- This position is responsible for supervising the cultivation team and is accountable for team performance and adherence to company Standard Operating Procedures.

Supervision Received:
- Reports to the Cultivation Manager

Supervision Exercised:
- Supports the Cultivation Manager in directing staff in accordance with the organization's policies and applicable laws. Management and supervisory responsibilities include planning, assigning, and directing cultivation work; appraising performance; rewarding and disciplining subordinates; addressing complaints and resolving problems.

Duties and Responsibilities:
- Performs all cultivation tasks, including: cloning, transplanting, feeding, defoliation, topping, flushing, foliar and preventative applications, waste disposal and inventory management

- Adheres to cultivation warehouse protocols and nutrient regiment
- Manages daily, weekly, and monthly plant scheduling and organization to precisely project cultivation needs
- Manages cloning and early vegetation in strict accordance with company's adopted procedures
- Executes Integrated Pest Management (IPM) protocols; preventative maintenance and elimination of pests and pathogens (e.g., insects, molds)
- Maintains a clean and organized work environment
- Possesses a good working knowledge of soil and hydroponic growing methods and an understanding of temperature and humidity manipulation
- Possesses comprehensive knowledge of cannabis strains: Sativa, Indica and Hybrids
- Performs regular inventory and quality assurance audits
- Complies with all HR policies including confidentiality and non-disclosure
- Performs in a manner consistent with the goals and values of the company

Qualifications:

- Bachelor's degree in biology/botany, horticulture, agriculture, or a related field is preferred
- Experience growing cannabis in a controlled environment, a greenhouse, or outdoors
- Familiar with cloning techniques and growing in several mediums such as coco or hydroponics
- Adaptability and flexibility; ability to work as part of a team
- Experience recording and reporting data
- Proficiency in technology software, desktop electronics, MS Office (Word, Excel, Outlook, PowerPoint)

Cultivation Agent

Role:

- This position is responsible for assigned cultivation tasks and will be cross-trained for multiple duties

Supervision Received:

- Reports to Lead Cultivation Agents and Cultivation Manager

Supervision Exercised:

- Carries out individual responsibilities in accordance with the organization's policies and applicable laws

Duties and Responsibilities:

- Supports Lead Cultivation Agents and the Cultivation Manager in timely completion of assigned tasks
- Performs all the tasks in the cultivation, including: plant scouting, tending, transplanting, feeding, defoliation, topping, flushing, inventory management, and waste management
- Tends the cannabis plants, giving each the specialized attention it needs
- Maintains a clean and organized work environment
- Possesses working knowledge of soils and hydroponic growing methodologies as well as understanding temperature and humidity manipulation
- Maintains knowledge of plant diseases, insects, and fungi, and adheres to company's

Integrated Pest Management (IPM) protocols
- Possesses comprehensive knowledge of cannabis strains: Sativa, Indica and Hybrids
- Assists in regular inventory and quality assurance audits
- Complies with all HR policies including confidentiality and non-disclosure

Qualifications
- Bachelor's degree in biology/botany, horticulture, agriculture, or a related field is preferred.
- Experience growing cannabis in a controlled environment, a greenhouse, or outdoors. Familiar with cloning techniques and growing in several mediums such as coco or hydroponics
- Preventive knowledge of molds, mildews insects and other pathogens
- Adaptability, flexibility, and the ability to work as part of a team
- Experience recording and reporting data
- Proficiency in technology software, desktop electronics, MS Office (Word, Excel, Outlook, PowerPoint)

Maintenance Manager

Role:
- This position manages all aspects of the facility including equipment maintenance, repairs and upgrades, and ensures that the facility is in good working order. This position is responsible for light maintenance, general cleaning, and upkeep in and around the facility.

Supervision Received:
- Reports to the Cultivation Manager and the General Manager

Supervision Exercised:
- Manages individual responsibilities in accordance with the organization's policies and applicable laws

Duties and Responsibilities:
- Ensures safe and satisfactory operation of equipment, irrigation/fertilization systems, environmental controls, and other relevant systems by adhering to preventive maintenance schedules, following manufacturer's instructions, troubleshooting malfunctions, budgets and executes repairs, maintains equipment inventories, evaluates new equipment and techniques
- Plans, organizes, coordinates, assigns and evaluates maintenance needs with approval of the Cultivation Manager
- Ensures that all activities are carried out in accordance with local and state standards
- Ensures that all work sites, shop areas and equipment are safe for the employees and visitors
- Attends construction meetings with management, architects, engineers and contractors
- Prepares and recommends maintenance operating budgets and monitors operating expenses to meet budget objectives
- Maintains inventory and purchases materials, supplies and equipment related to facilities maintenance
- Prepares and maintains appropriate maintenance records of completed activities
- Establishes, coordinates, and implements preventive maintenance on all systems in the

building including; HVAC, lighting, irrigation systems, etc.
- Coordinates pot washing
- Coordinates cleaning schedule
- Exterior landscaping and debris removal
- Maintains fire equipment and coordinates inspections
- Coordinates and oversees all facility inspections
- Provides reports to the General Manager and Cultivation Manager on a regular basis
- Performs in a manner consistent with the goals and values of the company
- Complies with all HR policies including confidentiality and non-disclosure

Qualifications:
- Bachelor's degree in Electrical, Mechanical Engineering, Business, Management, Operations, or related fields is required or equivalent experience
- Experience recording and reporting data
- Proficiency in technology software, desktop electronics, MS Office (Word, Excel, Outlook, PowerPoint)
- Experience in similar positions

Maintenance Team Member

Role:
- This position works with the Maintenance Manager in all aspects of the day to day facility and equipment maintenance, repairs and upgrades, and provides for the compliance related elements of the facilities operations. This position is responsible for light maintenance, and all general cleaning and upkeep in and around the cultivation facility.

Supervision Received:
- Reports to the Maintenance Manager

Supervision Exercised:
- Manages individual responsibilities in accordance with the organization's policies and applicable laws

Duties and Responsibilities:
- Ensures safe and satisfactory operation of equipment, irrigation/fertilization systems, environmental controls, and other relevant systems by adhering to preventive maintenance schedules following manufacturer's instructions, troubleshoot malfunctions, budget and execute repairs, maintain equipment inventories, evaluate new equipment and techniques
- Works with the Maintenance Manager to evaluates maintenance needs with approval of the Cultivation Manager
- Ensures that all activities are carried out in accordance with local and state standards
- Ensures that all work sites, shop areas and equipment are safe for the employees and visitors
- Maintains inventory and purchases materials, supplies and equipment related to facilities maintenance
- Maintains appropriate maintenance records of completed activities
- Establishes, coordinates, and implements preventive maintenance on all systems in the building including; HVAC, lighting, irrigation systems, etc.

- Coordinates pot washing
- Coordinates light cleaning schedule
- Exterior landscaping
- Maintains fire equipment and coordinate inspections
- Coordinates and oversees all facility inspections
- Provides reports to the Maintenance Manager and Cultivation Manager on a regular basis
- Performs in a manner consistent with the goals and values of the company
- Complies with all HR policies including confidentiality and non-disclosure

Qualifications:

- Bachelor's degree in Electrical, Mechanical Engineering, Business, Management, Operations, or related fields is required or equivalent experience.
- Experience recording and reporting data
- Proficiency in technology software, desktop electronics, MS Office (Word, Excel, Outlook, PowerPoint)
- Experience in similar positions

Inventory Control Manager

Role:

- This individual is responsible for tracking of all inventory
- Responsibilities include management of the California Cannabis Track and Trace
- (CCTT) system software and hardware, management of all inbound and outbound product, tracking, manifesting and all quality control functions.
- Serves as the Track and Trace Account Manager

Supervision Received:

- Reports to the General Manager

Supervision Exercised:

- Manages individual responsibilities in accordance with the organization's policies and applicable laws

Duties and Responsibilities:

- Responsible for providing oversight of accurate details of on-hand inventory, inventory in transit, inventory forecasts and inventory projections
- As Track and Trace Account Manger is responsible for training permitted users in the proper and lawful use of the system, for keeping records of each employee who received the training, and for maintaining an accurate, up-to-date and complete list of all CCTT system account managers and users
- Responsible for tagging all plants at the beginning of the plant life cycle and accurately entering them into the CCTT system
- Responsible for ensuring that the company complies with all state and local requirements for inventory control and system tracking
- Produces inventory reports daily, weekly and monthly and provide detail analysis of item performance
- Manages regular auditing of the physical cannabis inventory with assistance of Cultivation Manager and subordinates
- Maintains effective communication to communicate information related to inventory

reports for company management
- Manages all inbound and outbound shipping in accordance with all state and local regulations.
- Oversees all movement of cannabis product from the facility, and the associated data entry into the CCTT system and/or shipping manifests. Additionally, this individual will also ensure that all deliveries are received.
- Provides oversight of accurate details of inventory in transit
- Runs shipping and delivery reports daily, weekly and monthly and provide detailed analysis of item performance
- Maintains effective communication to ensure coordination between production and shipping teams
- Performs inventory adjustments as required
- Performs visual and electronic validation of shipped items to be reconciled with the invoice
- Performs inventory adjustments as required
- Performs visual and electronic validation of received consumables to be reconciled with the invoice
- Manages return-to-vendor process and coordinates adjustments to inventory
- Inputs current product descriptions in inventory tracking and point-of-sale systems
- Complies with all HR policies including confidentiality and non-disclosure
- Performs in a manner consistent with the goals and values of the company

Qualifications:
- Associate or bachelor's degree in Inventory Management or related field preferred.
- Thorough understanding or ability to be trained in CCTT system software.
- Broad understanding of all state compliance related to inventory tracking and reporting.
- Attention to detail.

Harvest Team Manager

Role:
- This position is responsible for managing the harvest and trim team and

Supervision Received:
- Reports to the Cultivation Manager

Supervision Exercised:
- Manages the Harvest Team (Harvest, Trim, and Dry/Cure)

Duties and Responsibilities:
- Responsible for managing the employees involved in harvesting the crop, and the separation of specific parts of the plant
- Responsible for managing the employees involved in trimming, drying and curing phases
- Weighs harvested plants to determine total plant wet weight for recording in the CCTT system
- Responsible for all harvest-related data entered into the CCTT system
- Exercises quality control practices and reports problems to the cultivation team and management
- Assist the cultivation team, when needed, with cultivation related activities

- Maintains a clean and organized work environment
- Maintains a culture of professionalism
- Complies with all HR policies including confidentiality and non-disclosure
- Performs in a manner consistent with the goals and values of the company

Qualifications:

- Associate degree in horticulture or agriculture preferred.
- Experience working in and management of a large grow operation's trim department preferred with experience hand and/or machine trimming.
- Familiarity with molds, mildews and pests.
- Strong understanding or ability to be trained in the inventory tracking software.

Harvest Team Member

Role:

- Responsible for performing work related to harvesting, trimming, drying and curing.

Supervision Received:

- Reports to the Harvest Team Manager

Supervision Exercised:

- Manages individual responsibilities in accordance with the organization's policies and applicable laws

Duties and Responsibilities:

- Takes direction from the Harvest team manager
- Responsible for performing tasks related to harvesting, trimming, drying and curing
- Responsible for recording and reporting data related to the process to the Harvest team manager
- Responsible for recording and reporting weight of any excess product that is considered "waste"
- Assists in cleaning and facility maintenance tasks including sweeping, cleaning pots or stakes, ensuring a clean and organized working environment, and sanitation of equipment
- Maintains a culture of professionalism and service
- Complies with all HR policies including confidentiality and non-disclosure
- Performs in a manner consistent with the goals and values of the company

Trim Duties

- Weigh harvested plants in their entirety to determine total plant wet weight for recording in the CCTT system
- After full plant wet weight is recorded, defoliate harvested plant in order to remove waste and by-products such as stalks, stems, dry and crispy leaves and bulk fan leaf
- Weigh all waste and by-products for recording in the seed to sale tracking system
- If hand trimming, use sterilized scissors or shears to trim remaining fan leaves from the plant in order to separate cannabis flower from cannabis tight trim
- If machine trimming, prep and sterilize proper equipment, monitor plant input and output to ensure successful process
- Weigh final waste, cannabis bud weight and cannabis tight trim weight and record in the seed to sale tracking system
- Prep trimmed plant material for the ongoing quality control process, including drying

and curing

- Act as a second level of defense by exercising good quality control practices and report problems to the cultivation team and management
- Assist the cultivation team, when needed, with pruning live cannabis plants in the flowering cycle to encourage better growth

Dry/Cure Duties

- Perform all tasks associated with drying including, weighing, racking, de-stemming and proper curing protocols
- Record final dry weight of cannabis inventory into the CCTT system
- Perform a final manicure and inspection of all harvested and trimmed cannabis inventory
- Batch like strains for entry in the CCTT system
- Be a team player and assist the Inventory Control Manager in all tasks associated with ensuring proper curing in preparation for processing
- Manage cannabis plants, giving each individual plant the attention it needs one at a time
- Manage plant scheduling and workflow to ensure tasks are completed in a timely fashion
- Execute preventative maintenance and elimination of all types of pests and pathogens, including; mold, powdery mildew, spider mites, root aphids, fungus gnats, etc.
- Expert knowledge of plant diseases, insects and fungi, as well as plant treatment options
- Maintain a clean and organized work environment
- Possess and maintain working knowledge in container systems and understanding of temperature and humidity manipulation
- Possess and maintain comprehensive knowledge of Cannabis strains; Sativa, Indica and Hybrids
- Assist Inventory Control Manager with regard to audit, inventory management, testing preparation, and facility inspections

Qualifications:

- Associate degree in horticulture or agriculture preferred.
- Experience working in a large grow operation's trim department preferred with experience hand and/or machine trimming.
- Experience performing quality control in a large grow operation.
- Familiarity with molds, mildews and pests.
- Strong understanding or ability to be trained in the CCTT system.

Quality Assurance Manager

Role:

- This position is responsible for ensuring adherence and compliance with all state requirements for cultivation, including testing of cannabis inventory. This individual will be responsible for keeping abreast of all regulatory changes and updates to the state laws and regulations as well as educating the entire cultivation team of applicable changes.

- Performs Quality Control and Quality Assurance through all levels of the operation to ensure consistent, safe, quality and timely product for delivery or sale.

Supervision Received:

- Reports to the Cultivation Manager

Supervision Exercised:

- Manages individual responsibilities in accordance with the organization's policies and applicable laws.

Duties and Responsibilities:

- Maintains accurate records of all compliance checklists, production logs, visitor logs, employees, processes, vendors, shipping and receiving manifests etc.
- Consistently attends local and state regulatory meetings and stay abreast of changes in laws and regulations
- Educates all personnel including owners and management on regulatory changes and compliance
- Hosts and leads in discussions with local and state audit representatives during scheduled and unscheduled inspections to answer questions and provide support where needed
- Maintains and updates compliance binder or software to keep current
- Ensures the operational licenses and permits are renewed and current
- Works in conjunction with the Inventory Control Manager and quality control team to ensure proper batches and samples are getting tested in accordance with California policy
- Works with third party testing labs on shipment, manifest and reporting of samples, data derived and proper reporting of findings to the state control board
- Performs Quality Control and Quality Assurance through all levels of the operation to ensure consistent, safe, quality and timely products for delivery or sale.
- Complies with all HR policies including confidentiality and non-disclosure
- Performs in a manner consistent with the goals and values of the company

Qualifications:

- Minimum bachelor's degree
- Experience in Manufacturing or Laboratory operations and controls, change management processes, regulatory affairs, validation, leadership, influencing, and negotiation.
- Solid understanding of equipment, manufacturing processes, maintenance and quality standards
- Strong understanding of quality control/quality assurance.
- Demonstrated and thorough knowledge of the SOPs and BMPs
- Knowledge of ISO, OHSA, or other quality systems
- Exhibited business acumen in understanding cross-functional processes, requirements, and relevant information flows, and translating gaps into solutions
- Demonstrated strategic, process-driven, analytical, and critical thinking
- Good communication skills

Security Manager

Role:

- This position manages all aspects of the facility's security operations and supervises all team members, works in a proactive manner to prevent diversion or theft.

Supervision Received:

- Reports to the General Manager

Supervision Exercised:

- Manages Security Associates and has oversight of cultivation staff via security systems while maintaining individual responsibilities in accordance with the organization's policies and applicable laws.

Duties and Responsibilities:

- Responsible for professional security protection, safeguarding, safety and security of assets, property, personnel, staff and all visitors
- Incorporates risk management strategies with specific guidelines that address all hazards, such as theft, diversion, tampering, power outages, or intruders
- Responsible for purchasing, implementing and maintenance of security system hardware and software, alarms, locks, and other security hardware
- Responsible for the monitoring of security surveillance systems both during and after hours
- Supervises Security Team Members to ensure that proper security protocols are implemented and maintained
- Training and development of security staff
- Meets the physical requirements for the job and the ability to work in the environmental conditions listed below to perform common security functions and duties
- Performs security patrols on foot
- Protects property from theft, embezzlement, sabotage, trespassing, fire and accidents
- Observes and reports of any unlawful activity to local and state officials as required by law
- Prevents theft or misappropriation of any goods, money or other items of value
- Protects individuals or property, included but not limited to proprietary information from harm or misappropriation
- Protects the control of access to the premises
- Crowd and visitor control
- Neutralizes situations calmly with tact and common sense
- Watches for safety including fire hazards and other related situations
- Enforces policies and Security Standard Operating Procedures of the company
- Provides any needed assistance to customers, employees, visitors or the public
- Performs requests by the staff and visitors within scope of security duties or within reason (i.e. escort staff to vehicles)
- Responsible for any after-hours security issues as a first point of contact
- Ability to communicate in English effectively both verbally and written
- Per federal, state, county and local requirements permitted to carry personal protection
- Complies with all HR policies including confidentiality and non-disclosure
- Performs in a manner consistent with the goals and values of the company
- Ensures that all visitors including vendors and contractors present government issued ID, sign a visitor log and wear a visitor ID badge that is visible to others at all times

while in a limited access area
- Makes a photocopy of the government issued ID for all visitors which will be retained with the visitor ID log
- Assigns visitor escorts to accompany all visitors while they are in the facility

Qualifications:
- Bachelor's or associate degree in Criminal Justice, Business, Management or equivalent experience preferred
- Military, law-enforcement or security experience
- Trained in firefighting, first-aid and life-saving techniques
- Two + years' experience supervising or management.

Security Team (Security Associate)

Role:
- The Security Team is responsible for professional security protection, safeguarding, safety and security of assets, property, personnel, customers and all visitors.
- Security Associates may be direct employees of the company or third-party vendor(s)

Supervision Received:
- Security Manager

Supervision Exercised:
- Manages individual responsibilities in accordance with the organization's policies and applicable laws

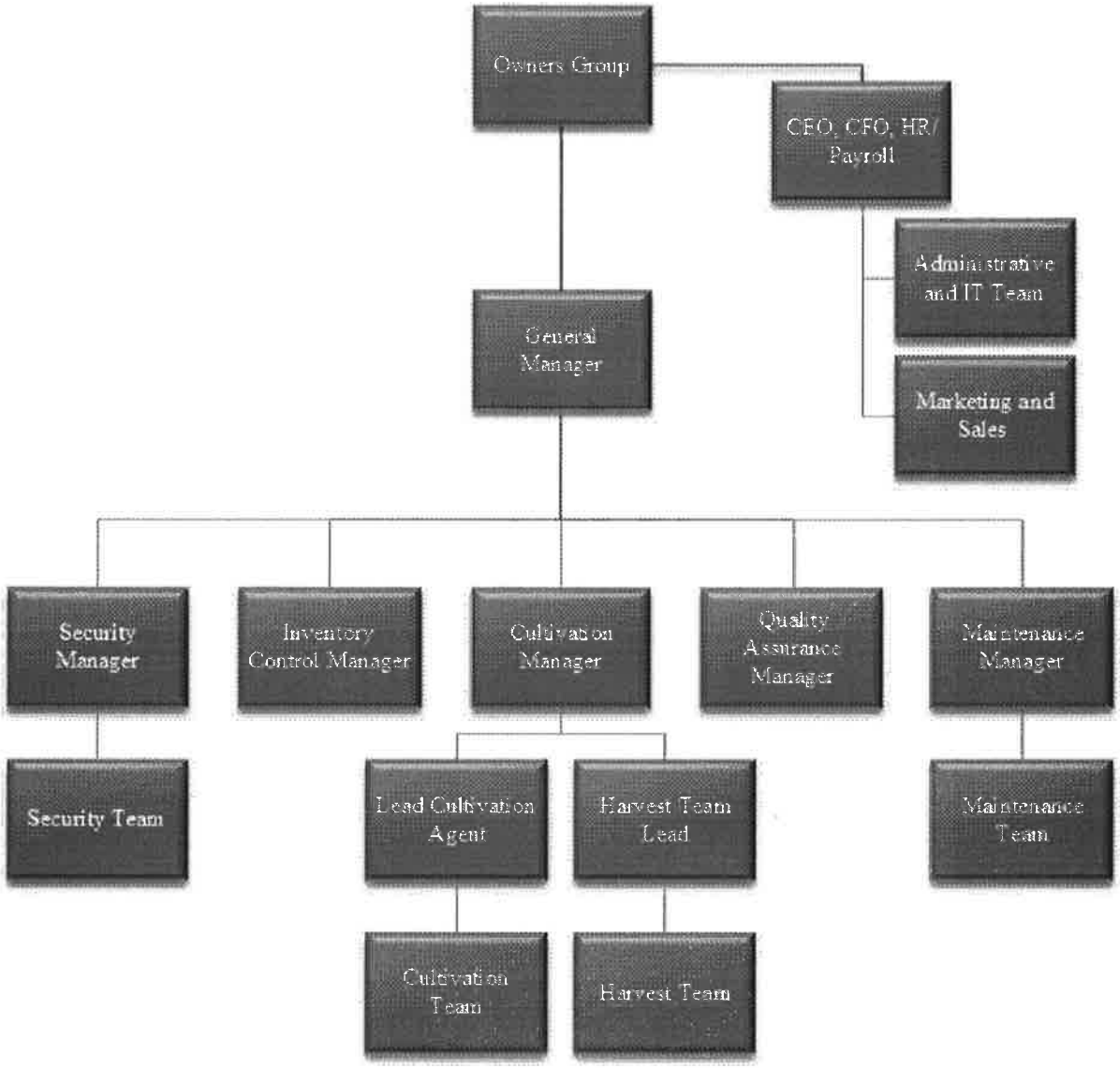
Duties and Responsibilities:
- Meets the physical requirements for the job and has the ability to work in the environmental conditions listed below to perform common security functions and duties
- Performs security patrols on foot
- Protects property from theft, embezzlement, sabotage, trespassing, fire and accidents
- Observes and reports of any unlawful activity to the Security Manager as well as state and local law enforcement as required
- Prevents theft or misappropriation of any goods, money or other items of value
- Protects individuals or property, included but not limited to proprietary information from harm or misappropriation
- Regulates control of access to premises
- Investigates and takes the appropriate lawful actions on accidents, incidents, trespassing, suspicious activity, safety and fire
- Neutralizes situations calmly with tact and common sense
- Watches for safety including fire hazards and other related situations
- Enforces policies and procedures of the company
- Provides any needed assistance to customers, employees, visitors or the public
- Performs request by the customers within scope of security duties or within reason
- Per federal, state, county and local requirements permitted to carry personal protection
- Complies with all HR policies including confidentiality and non-disclosure
- Performs in a manner consistent with the goals and values of the company
- Ensures that all visitors including vendors and contractors present government issued ID, sign a visitor log and wear a visitor ID badge that is visible to others at all times

while in a limited access area
- Makes a photocopy of the government issued ID for all visitors which will be retained with the visitor ID log
- Escorts all visitors while they are in limited access areas of the facility
- Ensures that the visitor does not touch any cannabis while in the facility

Qualifications:
- Military, law-enforcement, or security experience
- Trained in firefighting, first-aid, and life-saving techniques
- Two + years' experience in providing security services.

MEDICINE MAN
TECHNOLOGIES

Employee Organizational Chart



Creation and Implementation of Standard Operating Procedures

Bask Ventures, Inc. has developed standard operating procedures (SOPs) for the cultivation of cannabis that cover every step of the cultivation process in each production area of the cultivation facility. These SOPs will ensure the secure, safe, sustainable, and proper cultivation of cannabis by providing step-by-step instructions on every task within the facility along with guidelines for personnel conduct and quality assurance.

SOP documents will be well organized, presenting a purpose, policy, and procedure for every operation in the facility. The purpose establishes a general description of the items included in the SOP. The policy section provides the basis and reasoning for each procedure. Each SOP also provides a verbatim reference to the regulations from which it was derived. Procedures are presented in a step-by-step fashion and include any log forms, charts and diagrams required for proper recordkeeping.

SOP Organization

Bask Ventures, Inc. has put considerable thought into the facility's integrated SOP management system design and functionality. Each cultivation process will have a separate SOP based on its unique tasks and workflow. The core of the SOP details the full procedure from a first-person perspective in a step-by-step chronological manner. SOPs will include supplemental narratives, images, diagrams, graphs, charts, photos, process-flow, and floorplans to assist with training, workflow comprehension, and quick reference. SOPs will be available as a physical hardcopy maintained onsite for immediate reference and inspections by the Bureau of Cannabis Control, CalCannabis, or any other authorized law enforcement agency ("the State"). Electronic versions will include hyperlinks to regulatory references for each process, OSHA references, SDS sheets, and other relevant information (as available).

The SOP system will be maintained in a secure, cloud-based environment with administrative controls that allow for the immediate modification or removal of employee access. Employees will access a view-only environment that does not allow editing, downloading, or printing except to specifically-authorized personnel. Online capability will allow management to efficiently update and publish the SOPs. The Quality Assurance Manager (QAM) will be responsible for maintaining and updating both hardcopy and electronic versions of the SOP manual. The QAM will approve and document all SOP changes on a master change log, keeping a chronological record of all significant process changes, the reason for the change, (such as new regulations), the date the change was executed, and the QAM's initials indicating their final approval.

The SOPs will be organized using a number sequence that identifies the cultivation process to which it relates. For example, the 300 series may cover Cloning while the 700 series may be Sanitation. Related forms and checklists will be integrated into the SOPs through hyperlinks that take the user to the appropriate database. The forms database will be similarly organized with the same numbering sequence. A Clone related form, for example, would exhibit a 300-series number, a Sanitation checklist a 700-series number. Each form and checklist will indicate the length of time it must be archived and kept available for State inspection.

SOP Training

In addition to any state required industry training (e.g., track and trace training requirements 3 CCR§ 8109 and 16 CCR § 5048), Bask Ventures, Inc. has created a comprehensive in-house training plan for its employees based on the best management practices and proprietary growing methods created by Medicine Man Technologies (MMT), their selected cultivation consultant and an industry leader from Colorado. Please see Training Plan Framework for details on Bask Ventures, Inc.'s training program, which covers initial consultant cultivation training and company internal training.

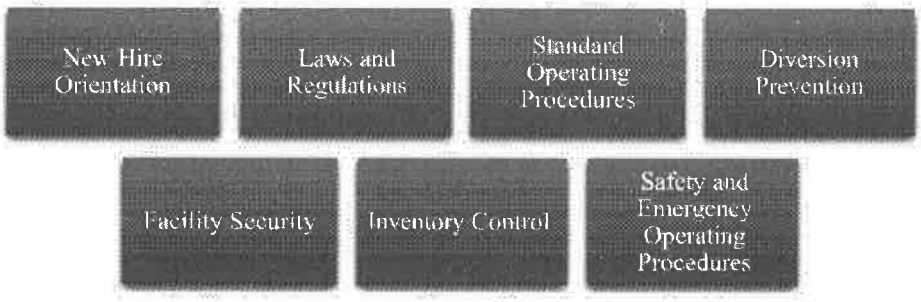
Initial Consultant Cultivation Training

Bask Ventures, Inc. will be provided with access to cultivation SOPs developed and refined by MMT through their relationship with Medicine Man Production Company [or Three-a-Light], a respected Tier III cannabis cultivator and operator based in Denver, CO. During onsite training at their operational cultivation facility, Medicine Man Production's team of growers will share their knowledge and first-hand experiences regarding the cultivation of cannabis. SOPs for the safe, secure, and successful growth and management of cannabis are broken into the following key sections:

1. Genetics/Plant Management: Plant acquisition, seed propagation, cloning, plant husbandry and rotation, protocols for entering plant information into the California Cannabis Track and Trace System (CCTT), and protocols for creating labels and tracking tags assigned to each plant.
2. Cultivation Process: Early, mid, and late vegetative stages, plant transfer protocols, water management, watering schedules, hand watering techniques, nutrient management, nutrient feeding schedules, flowering, pruning and topping, cleaning and maintenance, fungicide management, pesticide management, integrated pest management, and harvesting a flower system.
3. Post-Harvest Process: Hand-trimming, machine-trimming, drying, de-stemming, batching, curing, lab testing, and waste disposal.
4. Facility Management: Principles of storage, principles of labeling, nutrient management, pesticide management, principles of sanitation, and principles of recordkeeping.

Company Internal Training

Internal training will focus on industry basics including federal and California regulatory guidelines and proper implementation of facility SOPs. The ongoing, in-house training regimen will include:



Orientation training for new hires will include familiarization with the integrated SOP system. Employees will be provided a copy of all company policies, such as drug-free workplace rules.

Each employee's annual evaluation will include a review of their personnel file to ensure they are up to date on SOP training certification. Certifications will be cross-referenced in an employee's direct supervisor's file. The annual review of their supervisor will also include reference to the completed training of their direct report employees.

Training Documentation

Attendance at formal training classes will be mandatory. Training on specific SOPs, including applicable laws and regulations, will include an acknowledgement of completion signed by both the trainee and the training supervisor. Human resource files and training documentation will be maintained in hard copy and an electronic environment for ease of interaction, retention, auditing, and inspection. Employment contracts will specify attendance at training classes, and employees that do not complete the required training in the specified time could have their hours and duties restricted until the training is completed. Failure to complete the required training may lead to an employee's reassignment or termination.

List of SOPs

The following is a sample list of cultivation SOPs:

- Cleaning Grow Pots, Trays, Buckets, and Domes
- Cloning
- Clone Maintenance
- Drying and Curing
- Harvesting Plants
- Integrated Pest Management
- Limiting Cross Contamination
- Netting Tables
- Populating Flower Systems
- Prepping Nutrient Troughs
- Recall Procedures
- Receiving Products
- Room Sanitation Practices
- Scouting
- Shipping Product
- Transplanting
- Topping and Pruning Vegetative Plants
- Trim Machine Cleaning
- Trimming
- Waste Disposal
- Watering Flower Rooms
- Watering Vegetative Plants

Cultivation Training Plan Framework

As the cannabis industry changes in California, Bask Ventures, Inc. is in a unique position to select choice employees from a broad existing labor pool of experienced professionals to immediately draw from for cannabis cultivation operations. Bask Ventures, Inc. is committed to reaching out to the local and state-wide community to select a diverse group of individuals who exhibit the aptitude, a strong work ethic, and an eagerness to excel in the industry. In addition to the track and trace training required by the Bureau and CalCannabis ("the State"), Bask Ventures, Inc. will develop a robust internal training program to aid the professional development of cultivation employees. Bask Ventures, Inc.'s selected cultivation consultant, Medicine Man Technologies (MMT), will assist in building the training curriculum and performing initial training of start-up crew members. The following ongoing, in-house training program for cultivation staff is designed to exceed industry standards.

Track and Trace System (CCTT) Training

Within 10 business days of receiving notice that our application for licensure has been received and is complete, Bask Ventures, Inc. will register for the State-required CCTT system training program. Bask Ventures, Inc. will provide the State with documentation of training completion within 10 business days [3 CCR § 8109].

Bask Ventures, Inc. will use the CCTT system to record all applicable commercial cannabis activities. Bask Ventures, Inc.'s Inventory Control Manager (ICM) will serve as the company's Track and Trace Account Manager (TTAM) as required by 3 CCR § 8402. As the TTAM, the ICM will successfully complete the track and trace training required by the State and will subsequently train Bask Ventures, Inc.'s other managers and designated system users in the proper and lawful use of the system before they are allowed to use it. The TTAM will maintain a complete, accurate, and up-to-date list of all CCTT system account managers and authorized users and will have the ability to cancel and deny any user from accessing the Bask Ventures, Inc.'s CCTT system account as needed (e.g., on termination). In addition, the TTAM will correct any data entered into the system in error within 3 business days of the error's discovery [3 CCR § 8402].

The TTAM in cooperation with the General Manager (GM) will develop a back-up recordkeeping plan in case of loss of access to the CCTT system for any reason. The TTAM will document the cause for each loss of access and the date and time when access to the CCTT system was lost and when it was restored. The TTAM and GM will prepare and maintain comprehensive records detailing all required track and trace activities conducted during the loss of system access. Within 3 business days of system access restoration the TTAM will enter all track and trace activities that occurred during the loss of access into the CCTT system [3 CCR § 8402].

Records related to Bask Ventures, Inc.'s TTAM administered employee track and trace training will minimally include the date(s) the training occurred, a description of the provided training, and the names of the employees who received it [3 CCR § 8400].

Immersive Cultivation Training

As Bask Ventures, Inc.'s consultant, MMT will provide Bask Ventures, Inc. with access to fully developed and refined cultivation standard operating procedures (SOPs) through their relationship with Medicine Man Production Company, a respected Tier III cannabis cultivator and operator based in Denver, CO. During training at their operational cultivation facility, Medicine Man Production's team of professional growers will share their knowledge and first-hand experiences regarding the cultivation of cannabis. SOPs for the safe, secure, and successful growth and management of cannabis are broken into the following key sections:

1. Genetics/Plant Management: Plant acquisition, seed propagation, cloning, plant husbandry and rotation, protocols for entering plant information into the CCTT system, and protocols for creating labels and tracking tags assigned to each plant.
2. Cultivation Process: Early, mid, and late vegetative stages, plant transfer protocols, water management, scouting, watering schedules, hand watering techniques, nutrient management, nutrient feeding schedules, flowering, pruning and topping, cleaning and maintenance, fungicide management, pesticide management, detecting common plan afflictions, and harvesting.
3. Post-Harvest Process: Hand-trimming, machine-trimming, drying, de-stemming, batching, curing, lab testing, and waste disposal.
4. Facility Management: Principles of storage, principles of labeling, nutrient management, pesticide management, principles of sanitation, and principles of recordkeeping.

Staff including managers and lead cultivation agents will be trained at one of MMT's partner facilities in Denver, Colorado for their job classification in the proposed facility. Overall principals of facility management will be demonstrated to aid trainees in understanding key tasks and the various ancillary operations beyond their daily routine. Specific training regimens will be tailored for each role to ensure staff are proficient in the basic tasks for the position they are being hired to fulfill. The time spent on site at an operational grow in Denver will provide invaluable, comprehensive training to staff at a top-rated facility employing proven cultivation methods. Trainees will have the opportunity to learn their various duties through repetitive exposure to associated tasks while immersed in a real-time, working cultivation.

The Denver training sessions cover all key SOPs and conclude with a question and answer period for each:

1. Review department specific training videos organized by cultivation process function, for example, cloning, clone maintenance, and flowering
2. Review of training video summaries, which include a detailed step-by-step explanation of the duties and responsibilities that were provided
3. Review department specific SOPs in the licensed MMT Cultivation Operating Manual,
4. Perform the trained function within the MMT cultivation facility, which can take the form of:
    a. Observation and job shadowing;
    b. Actively asking questions to instructing cultivation agents;
    c. Performing functions within a live operating environment; hands-on training will be repeated several times within the training process);
    d. Teach the teacher- a pedagogic tool enabling trainees within the live environment to teach the functions to the instructing cultivation agent while also receiving feedback on the process; and/or

e. General debriefing of the four-step training process for group follow up and question and answer.

An example two-week training curriculum is broken out as follows:

Week 1- General overview of cannabis cultivation SOPs.

All week (intermittently): Trained on properly harvesting a flower system, proper hand and machine-trimming techniques – the art of trimming the plant, including single flowers, tight trim, and fan leaves. Also trained on the post-harvest drying and curing process focused primarily on quality assurance.

Day 1: Trained on preparing troughs with nutrients, learning feed schedules, physically feeding cannabis plants, carefully checking each plant for afflictions or issues such as insect or other pest infestation. Physically feeding and watering each plant allows cultivation agents to remain proactive in regard to plant management and maintenance.

Day 2: Trained on cleaning and disinfecting a flower system, potting and transplanting cannabis plants, mixing soil, populating vegetative systems, populating flower systems, efficient plant transport between vegetative and flower rooms, creating a "screen of green" by manipulating plant structure, topping early and mid-vegetative plants, and pest management protocols, including the use of pesticides.

Day 3: Repeat of Day 1 training exercises.

Day 4: Repeat of Day 2 training exercises, adding proper fungicide management protocols.

Day 5: Review of Days 1 - 4 training exercises.

Week 2 - Reinforce specific lessons from Week 1 with hands on training in the cultivation to bolster skills for individuals who may need additional specialized instruction. For example, if an individual cultivation agent has trouble learning proper plant cloning techniques, the individual will spend the bulk of Week 2 getting hands on experience with the cloning process.

Bask Ventures, Inc. management and trainees will receive feedback directly from Medicine Man Production's staff to identify strengths and weaknesses as they move through the training process. Identifying knowledge gaps and providing targeted suggestions for improvement will provide adequate time for additional training, as needed, for each team member to become familiar with the various tasks outlined in the SOPs.

MMT will imbed a consulting trainer for the first week the Bask Ventures, Inc. becomes fully operational and may also provide temporary contract support for vacant positions yet to be filled. Once Bask Ventures, Inc. management and core staff are sufficiently trained in the SOPs, designated management staff members will be responsible for internally managing the training process for any new hires. Additional requested follow-up or more customized training will remain available from MMT at one of their partner facilities.

Training on Statutes and Rules

A comprehensive understanding of the laws and regulations that govern the cannabis industry is vital in such a heavily-regulated and highly-scrutinized environment. Employees **must** appreciate the importance of compliance for their own safety, the safety and health of patients

and the operational success of the company. Bask Ventures, Inc.'s Quality Assurance Manager (QAM) will conduct regular training sessions to update staff on current regulatory developments. SOPs will include regulatory references and relevant excerpts via hyperlink to allow the employees to read the entire related regulation without having to exit the online interface. Inclusion of regulatory information in the SOPs will allow employees to view procedures within a regulatory frame of reference and ensure their understanding of the purpose and importance of the steps they are learning. SOPs will be clear, concise, and easy to understand and use.

Training Documentation

Attendance at formal training sessions, and CCTT system training presented by the ICM acting as the TTAM, will be mandatory for Bask Ventures, Inc. employees. Completion of training on specific SOPs, including applicable laws, regulations, and the CCTT system will require signatures of acknowledgement from both the trainee and their supervisor (or TTAM).

Documentation of completed training, whether in-house or external, will be retained in each employee's personnel file, maintained in hard copy, and backed up electronically per Bask Ventures, Inc.'s standard recordkeeping policies. Employment contracts will specify mandatory attendance at training sessions. Employees who do not complete the required training in the specified time may have their hours and duties reduced or restricted until the training is completed. Failure to complete the required training may lead to an employee's reassignment or termination.

Compliance Review and Internal Audits

Bask Ventures, Inc.'s Training Plan will incorporate audit and evaluation features that clearly show an employee's level of comprehension of an individual SOP. These assessments provide managers with instant insight into the proficiency of their staff and reveals who may require additional training. This commitment to individualized training demonstrates Bask Ventures, Inc.'s dedication to effective employee education and long-term professional development, rather than simple document distribution.

Bask Ventures, Inc.'s QAM will be responsible for SOP training and implementing regularly occurring and random employee audits. Reoccurring audits will include a review of employee personnel files to ensure SOPs within their job description have been acknowledged by both the employee and their supervisor. Random audits will entail selecting an employee to demonstrate their knowledge and proficiency of an SOP from their job description. Audit activity, employee performance observations, and the steps taken to improve upon or correct inadequacies will be documented within the employee's personnel file. Managers and supervisors will be held accountable for the training of their staff as part of their own overall job performance.

Employee Training Manual

The Employee Training Manual will be divided into sections that reinforce all topics reviewed during training. The training manual may include:

1. A new-hire orientation training section - New employees will go through an orientation period. As they begin their tenure, employees will be presented with a training manual to include a review of all company policies, such as drug-free workplace rules and nondisclosure requirements. This phase of training will also include a comprehensive

introduction to company SOPs, the CCTT system, and how to use them.

2. Laws and Regulations: This section of the training manual will include the critical laws and regulations Bask Ventures, Inc. and its employees are subject to. References to these laws and regulations will be incorporated into Bask Ventures, Inc.'s SOPs.
3. SOP training curriculum: The SOPs themselves will comprise the primary training curriculum. The training manual will include an example of Bask Ventures, Inc. SOP documents and reference the actual SOP manual. SOP training will be acknowledged by employees and their managers with a signature from each to denote their comprehension, proficiency, and compliance.
4. Detection and prevention of diversion: This training will be designed and implemented with assistance from Bask Ventures, Inc.'s selected security vendor(s) who will help customize Bask Ventures, Inc.'s comprehensive security strategy and will conduct training sessions for its employees.
5. Facility Security: This training will be designed and implemented with assistance from Bask Ventures, Inc.'s selected security vendor(s) who will help provide customized security planning and training to Bask Ventures, Inc.'s employees.
6. Safety and Emergencies: This training will be designed and implemented with assistance from Bask Ventures, Inc.'s selected security vendor(s) and local fire and safety agencies. Employees will be trained to deal with various emergency situations. Periodic and random drills will be performed to ensure preparedness.
7. Inventory Control: The training manual will include a section that provides an overview of inventory control. The CCTT system is third-party software that will have its own comprehensive operations and user manual.
    a. As the TTAM, the ICM will subsequently train Bask Ventures, Inc.'s other managers and designated system users in the proper and lawful use of the CCTT system before they are allowed to use it.

Training and Development Programs

Bask Ventures, Inc. will develop a detailed training and employee retention program to encourage personal and professional growth within the organization. Operating in a changing industry presents a unique opportunity to attract a diverse workforce and turn them into industry experts. Bask Ventures, Inc. will provide the training necessary to successfully integrate new hires into our company and the industry. Once our people become proficient they will have gained a valuable personal asset and be set on a career path in a vibrant growing industry. Engaging with MMT, a premier industry consulting partner with training programs designed to develop employees from entry level to industry expert will provide Bask Ventures, Inc. with a distinct advantage. In addition to the CCTT system training provided by the TTAM and customized facility training provided by MMT, Bask Ventures, Inc. envisions providing the following supplementary areas of instruction. Program managers will be encouraged to augment internal training by attending outside seminars.

- Benefits Enrollment
- Supervisory Training
- Cultural Difference Awareness
- Mentoring
- Cross-Training
- Hazardous Materials and Response Training

- OSHA recommended courses
- Continuing Education
- Community Volunteering Incentives

Plant/Product Timeline

This timeline is based on propagating inventory from clones, the quickest method to making product available for sale. As plants move through their life cycle and through each department in the facility, proper inventory tracking and reporting will occur in accordance with Bask Ventures, Inc.'s Inventory Control standard operating procedures (SOPs).

Pre-Cultivation Preparation

Construction: 6 Months
Upon receiving its license, Bask Ventures, Inc. is poised to immediately initiate the building design and construction phase. When construction is complete, all inspections have been conducted, and approval to cultivate has been granted, Bask Ventures, Inc. will begin the process of ordering and stocking supplies for the cultivation. Simultaneously, Bask Ventures, Inc. will install the California Cannabis Track and Trace (CCTT) system software. From start of construction to stocking the facility with supplies is estimated to take no more than 6 months.

Initial Facility Design and Setup: 2-4 weeks
Facility rooms will be designed and constructed to meet the security parameters set by the State of California, including CalCannabis ("the State"). Cultivation production rooms will be assigned by growing phase, for example, clones/cuttings, vegetative (veg), flowering, transplanting, harvesting, and curing. Post-production areas include harvesting, drying, curing, testing, packaging, storage, and shipping. Separate sections of the facility will be dedicated to harvesting, transplanting, and curing. Cured flowers will be stored in a secure vault until ready for packaging. A separate area is dedicated to labeling, packaging, and shipping. Disposal will take place in a segregated, limited-access area dependent on set security protocols.

Pursuant to 16 CCR § 5502, *Cultivation Plan Requirements,* Bask Ventures, Inc. has developed a cultivation plan that includes a detailed diagram of the premises showing all boundaries and dimensions in feet to scale of the canopy areas containing mature plants, at any point in time including aggregate square footage. The canopy is calculated in square feet and measured to include all clearly identifiable boundaries between areas that contain mature plants at any point in time, including the spaces within boundaries. For mature plants cultivated on a shelving system, the surface area of each shelf level is included in the total canopy calculation. Each unique area included in the total canopy calculation is separated by an identifiable boundary including, for example, interior walls, shelves, greenhouse walls, hoop house walls, garden benches, hedgerows, fencing, garden beds, and garden plots.

The plan also details areas outside of the canopy where immature plants are maintained; designated pesticide and other agricultural chemical storage areas; designated processing, packaging, and secure waste disposal areas, including composting areas; designated areas for harvested cannabis storage; designated research and development areas containing mature plants for nursery; and designated seed production areas containing mature plants for nursery.

A lighting diagram showing the location of all lights in the canopy areas and the maximum wattage (or wattage equivalent) of each light is also included in the plan. In addition, a pest management plan detailing product names and active ingredients for any used pesticides during

any stage of plant growth along with integrated pest management protocols including chemical, biological, and cultural methods used to control or prevent the introduction of pests on the cultivation site has been fully developed for implementation.

Plant Life Cycle

The total cultivation production schedule is typically just over 5 months, with a variable timeline for product testing and outbound shipping to a licensed dispensary or processor.

Day 1 - Day 18 (est.)

Stage of Production: Cloning and Clone Maintenance

Purpose: To create new immature cannabis plants by taking cuttings of select cannabis plants and encouraging root growth and development. Retention of certain genetic strain traits is key and can be accomplished through effective cloning methods.
Process Oversight and Validation Responsibility: Cultivation Manager
Tasking Assigned Responsibility: Lead Cultivation Agents
Products Used: Nitrile Gloves, Scissors, Clone Dome, 1.5 x 1.5" Rockwool Cubes
Nutrients/Growth Additives Used: Clonex® Rooting Hormone Gel
Preferred Temperature Range: 77-79°F
Preferred Humidity Range: 70-80% during transfer to vegetative phase (12-24 hours)
Preferred CO_2 Level: N/A
Step 1: Identify the best plants for cloning, typically the strongest and healthiest plants.
Step 2: When selecting a branch to remove for cloning, keep in mind that skinny, lower branches will be stronger in the long run and take root much quicker. Always cut clones with extremely sharp scissors and sterilize scissors between cuttings.
Step 3: After determining which branch to remove, make the cut at a 45° angle to the stem. The cutting is at its most fragile state at this point, so moving quickly through the next steps will be critical to minimize shock.
Step 4: Submerge cutting into root stimulator.
Step 5: Gently, but firmly, place the cutting into a 1.5 x 1.5" Rockwool cube about 1" down. This will ensure a solid foundation for the young plant.
Step 6: Place cubed cuttings into the clone dome. Be sure to check under the clone dome every other day to allow fresh air and new humidity to circulate. Different strains will root at different speeds, generally from 8 – 14 days.

Day 18 (est.)

Stage of Production: Transplant Clones and Begin Vegetative Growth Phase

Purpose: To move clones out of their original 1.5 x 1.5" Rockwool cubes within the clone dome into larger 4 x 4" or 6 x 6" Rockwool Cubes, stimulating additional root growth. A very sensitive and fragile step that should be executed with the utmost care.
Process Oversight and Validation Responsibility: Cultivation Manager
Tasking Assigned Responsibility: Lead Cultivation Agents
Products Used: Nitrile Gloves, 4 x 4" Rockwool Cubes, 6 x 6" Rockwool Cubes
Preferred Temperature Range: 77-79°F
Preferred Humidity Range: 70-80% during transfer to vegetative phase (12-24 hours)
Preferred CO2 Level: N/A

Nutrients/Growth Additives Used: Success Micro™, Success Trees™, Success Flowers™, Success Blast Off™, SUPERthrive®, Success Balance™
Step 1: Confirm that it is time to move clones out of the dome. Depending on which genetic strain is being grown, roots should begin to emerge 8-11 days from the time the clone was taken. Once roots have emerged, it is time to transplant the clone into its new environment.
Step 2: Prepare clone dome and clones to transplant clones into 4 x 4" or 6 x 6" Rockwool Cubes, depending on the genetic strain.
Step 3: Power up the room humidifier and begin raising humidity level in the room.
Step 4: Submerge all cubes into 70°F RO water and wait 15-30 minutes to soak thoroughly.
Step 5: Remove each cube from the water. Squeeze cube to release as much water as possible (around 75%).
Step 6: Place cubes in tray under designated LED or similar lights. Decrease light output to 60% during the first 24 hours, returning to normal on day 2 or 3 depending on rate of acclimation.
Step 7: Carefully and gently move all clones out of the dome and plug them into the Rockwool Cubes.
Step 8: Water and feed plants according to Clone Transplant feeding schedule. Legally treat and dispose of generated wastewater.
Step 9: Maintain records of the type and amounts of nutrients, fertilizer, and any growth additives used.
Step 10: Aggregate any plant waste and dispose of per Waste Disposal SOPs.

Day 32 (est.)
Stage of Production: Final Transplant (Rockwool Cubes to 7-Gallon Pot)
Purpose: To develop maximum root growth on young plants that have completed their initial rooting and begun their early vegetative process before transitioning them into the flowering phase.
Process Oversight and Validation Responsibility: Cultivation Manager
Tasking Assigned Responsibility: Lead Cultivation Agents, Cultivation Agents
Products Used: Nitrile Gloves, Growing Medium, 7-Gallon Pot
Nutrients/Growth Additives Used: Success Micro, Success Trees, Success Flowers, Success Blast Off, SUPERthrive, Success Balance
Step 1: Confirm that it is time to move the plants into a pot. Once a few roots have developed underneath the cube, it is a good time to transplant. This ensures the roots have optimum space for growth.
Step 2: Fill 7-gallon pot with growing medium and gently pat down while filling. Be sure to leave enough space for a 4" x 4" or 6" x 6" Rockwool Cube to sit comfortably.
Step 3: Place Rockwool Cube in pot.
Step 4: Spread Mycorrhiza™ over top of soil.
Step 5: Fill remaining space in bucket with growing medium. Gently pat down all growing medium until 4 x 4" or 6 x 6" Rockwool Cube is completely covered.
Step 6: Water and feed plants according to Early Vegetative feeding schedule. Legally treat and dispose of the generated wastewater
Step 7: Maintain records of the type and amounts of nutrients, fertilizer, and any growth additives used.
Step 8: Aggregate any plant waste and dispose of per Waste Disposal SOPs.

Day 32 - Day 46 (est.)
Stage of Production: Vegetative Plant Maintenance (Scouting, Tending, Feeding)
Purpose: Maintain the health and optimal environment of the vegetative room(s) and plants.
Process Oversight and Validation Responsibility: Cultivation Manager
Tasking Assigned Responsibility: Lead Cultivation Agents, Cultivation Agents
Products Used: Nitrile Gloves, Scissors, Green LED Headlamps
Preferred Temperature Range: 78-81°F during light period (daytime), 70-71°F during dark period (nighttime)
Preferred Humidity Range: 55% throughout remainder of vegetative phase
Preferred CO2 Level: N/A
Nutrients/Growth Additives Used: Success Micro, Success Trees, Success Flowers, Success Blast Off, SUPERthrive, Success Balance, Success Sugar ™, Success Silica ™, Nutrilife SM-90
Step 1: On a regularly scheduled basis (e.g., Monday, Wednesday, Friday), evaluate the vegetative room balance. Visually inspect and actively scout vegetative tables and racks to ensure that growing plants have no visible mold, mildew, pests, rot, or grey or black plant matter that is greater than an acceptable level.
Step 2: Visually ensure plant canopy is developing evenly through gentle tending and pruning of plants to ensure uniformity and consistency throughout the tables and racks.
Step 3: Water and feed vegetative plants according to varying vegetative stage feeding schedules. Flush vegetative plants according to varying vegetative stage flush schedules. Legally treat and dispose of generated wastewater.
Step 4: Maintain records of the type and amounts of nutrients, fertilizers, and any growth additives used.
Step 5: Aggregate any plant waste and dispose of per Waste Disposal SOPs.

Day 32 - Day 46 (est.)
Stage of Production: Vegetative Plant Pruning / Topping
Purpose: Allows a cultivation team to shape plants, encouraging them to grow to a specific size and shape. Facilitates a quicker and more efficient vegetative cycle. Topping (cutting off the very top of the plant) encourages plants to grow wide instead of tall, creating an even canopy and optimizing grow space within the plant block. This fills the canopy, maximizing yield per light. Up-dressing is the process of pruning low-hanging leaves and branches from the bottom up, ensuring that plant material does not touch the grow medium while also encouraging upward growth.
Process Oversight and Validation Responsibility: Lead Cultivation Agent
Tasking Assigned Responsibility: Cultivation Agent
Products Used: Nitrile Gloves, Scissors
Nutrients/Growth Additives Used: N/A
Step 1: Evaluate the vegetative room, identifying a consistent canopy level that the majority of plants exceed.
Step 2: Once the preferred canopy level is identified, trimmall stems and branches to the desired canopy height.
Step 3: Up-dress vegetative plants between week 4 and week 6. This will re-focus the plant's energy towards building new tops, preparing them for the flowering phase. The process of pruning may occur every 5-7 days depending on the rate of growth.
Step 4: Aggregate any plant waste and dispose of per Waste Disposal SOPs.

Day 46 (est.)
Stage of Production: Transition to Flowering Phase
Purpose: To move vegetative cannabis plants from a vegetative phase to a flowering phase, where they will begin to produce flowers, or "buds."
Process Oversight and Validation Responsibility: Cultivation Manager
Tasking Assigned Responsibility: Lead Cultivation Agent, Cultivation Agent
Products Used: Nitrile Gloves
Nutrients/Growth Additives Used: N/A
Step 1: Visually inspect the vegetative canopy to verify that it is, at a minimum, 75% full. This will leave room for continued growth as most genetic strains will at least double in size by the end of the flowering phase. If a nearly-full canopy has not been achieved, continue to focus on widening plants through the vegetative plant pruning process identified above. Be careful to not over-prune as plants may respond negatively.
Step 2: Physically move plants from a vegetative to a flowering room, paying the utmost attention to sanitation to prevent cross-contamination within the facility.
Step 3: Aggregate any plant waste and dispose of per Waste Disposal SOPs.

Day 46 - Day 116 (est.)
Stage of Production: Flowering Plant Maintenance (Scouting, Tending, Feeding)
Purpose: Maintain the health and environmental balance of the flowering room(s) and plants.
Process Oversight and Validation Responsibility: Cultivation Manager
Tasking Assigned Responsibility: Lead Cultivation Agents, Cultivation Agents
Products Used: Nitrile Gloves, Scissors, Green LED Headlamps
Preferred Temperature Range: Week 1- 4: 78-81°F during daytime, 70-71°F during nighttime. Week 5-8: 79-83°F during daytime, 69-71°F during nighttime. Week 9-10: 78-82°F during daytime, 68-70°F during nighttime.
Preferred Humidity Range: 53-57% throughout the flowering phase
Preferred CO2 Level: No greater than 1500 ppm during daytime, reduce during nighttime to typically 400 ppm
Nutrients/Growth Additives Used: Success Micro, Success Trees, Success Flowers, Success Blast Off, Success Balance, Success Sugar, Success Silica, Success Flame ™, Success Game Time ™
Step 1: On a regularly scheduled basis (e.g., Monday, Wednesday, Friday), evaluate the flowering room balance. Visually inspect and actively scout flowering tables and racks to ensure that growing plants have no visible mold, mildew, pests, rot, or grey or black plant matter that is greater than an acceptable level.
Step 2: Encourage even canopy development through gentle tending and pruning of plants to ensure uniformity and consistency throughout the tables and racks.
Step 3: Actively tie down flowering plants to further develop consistent canopy development while actively pruning and up-dressing lower plant foliage. This added support will enable the plants to focus on flower production.
Step 4: Water and feed flowering plants according to varying flowering stage feeding schedules. Flush flowering plants according to varying flowering stage flush schedules. Treat and dispose the wastewater generated in accordance with applicable laws and regulations.

Step 5: Maintain records of the type and amounts of nutrients, fertilizer, and any growth additives used.
Step 6: Aggregate any plant waste and dispose of per Waste Disposal SOPs.

Day 116 (est.)
Stage of Production: Harvest
Purpose: To harvest mature cannabis plants.
Process Oversight and Validation Responsibility: Cultivation Manager
Tasking Assigned Responsibility: Harvest Team Lead, Cultivation Agents, Inventory Control Manager (ICM)
Products Used: Nitrile Gloves, Weighing Tray, Calibrated Scale
Step 1: Prior to harvest, visually inspect and actively scout flowering tables and racks to ensure that growing plants have no visible mold, mildew, pests, rot, or grey or black plant matter that is greater than an acceptable level.
Step 2: Remove plants and pot containers from the flowering room and stage them for harvest.
Step 3: Record total plant weight in the CCTT system.
Step 4: Aggregate any plant waste collected during the harvest process and dispose of per Waste Disposal SOPs.

Day 116 (est.)
Stage of Production: Trimming Process
Purpose: Remove stems and fan leaves from plants and efficiently trim them to collect finished buds and tight trim for processing.
Process Oversight and Validation Responsibility: Harvest Team Lead
Tasking Assigned Responsibility: Trimmer
Products Used: Nitrile Gloves, Scissors, Weighing Tray, Calibrated Scales, Machine Trimmer
Step 1: Trim the fan leaves from the plant. Remove stems by cutting them as close to each bud as possible. Aggregate waste stalks, stems, and fan leaves; determine weight and record in the CCTT system.
Step 2: Carefully run remaining cannabis through the machine trimmer, capturing finished buds and tight trim. Determine wet bud weight using the calibrated scale and record in the CCTT system. Determine wet trim weight using the calibrated scale and record in the CCTT system.
Step 3: Aggregate any non-usable plant waste collected during the trimming process and dispose of per Waste Disposal SOPs.

Day 116 - Day 126 (est.)
Stage of Production: Drying Process
Purpose: To remove excess moisture from trimmed cannabis flower.
Process Oversight and Validation Responsibility: Harvest Team Lead
Tasking Assigned Responsibility: Dry/Cure Team
Products Used: Nitrile Gloves, Weighing Tray, Calibrated Scales, Stainless Steel Dry Racks
Step 1: Space cannabis buds and trim on the stainless steel drying racks along with the associated RFID tag(s) for each batch. Monitor and agitate the buds daily for 7-10 days to check for quality control concerns such as mold, mildew, or other issues, and prevent flat spots or uneven moisture.

Step 2: Determine dry bud weight using the calibrated scale and record in the CCTT system. Determine dry trim weight using the calibrated scale and record in the CCTT system.
Step 3: Aggregate any plant waste collected during the drying process and dispose of per Waste Disposal SOPs.

Day 126 - Day 154 (est.)
Stage of Production: Curing Process
Purpose: To prepare dry cannabis buds for consumption through prolonged, controlled ventilation (curing), yielding a consistent moisture content throughout the plant material and drastically improving the flavor of the cannabis.
Process Oversight and Validation Responsibility: Harvest Team Lead, Quality Assurance Manager (QAM)
Tasking Assigned Responsibility: Dry/Cure Team
Products Used: Nitrile Gloves, Weighing Tray, Cure Buckets
Step 1: Place dried cannabis in an airtight, opaque cure bucket or other container along with the associated RFID tag(s).
Step 2: Ventilate containers for 30 minutes at a time, 3-4 times a week, over the course of 2-4 weeks to allow built up gases and residual moisture to escape. The QAM will confirm the when the batch has passed all internal quality control checks and is considered fully cured.
Step 3: Determine final cured bud weight using the calibrated scale and record in the CCTT system. Prepare for packaging.
Step 4: Aggregate any plant waste collected during the curing process and dispose of per Waste Disposal SOPs.

Day to be Determined (est. based upon lab testing party pickup)
Stage of Production: Testing
Purpose: To set aside a sample of finished cannabis for required State testing.
Process Oversight and Validation Responsibility: QAM
Tasking Assigned Responsibility: QAM, ICM
Products Used: N/A
Step 1: Interact with independent testing facility and staff to facilitate testing.

Day 155 - Day 156 (est. based upon completed lab testing)
Stage of Production: Batching Process
Purpose: To batch all plant material of the same variety of cannabis according to State restrictions.
Process Oversight and Validation Responsibility: Harvest Team Lead
Tasking Assigned Responsibility: Dry/Cure Team
Products Used: Nitrile Gloves, Weighing Tray, Cure Buckets, Cure Totes, Printer
Step 1: Pending test approval, aggregate all plant material of the same variety by weight up to the State limitations.
Step 2: Prepare CCTT system to generate a batch.
Step 3: Once configured properly within the CCTT system, place the plant material on the weighing tray and print the associated batch label.
Step 4: Place batch of plant material into a cure tote and secure it in the secure inventory storage vault.

Day to be Determined (est. based upon order placed)
Stage of Production: Shipping to Cannabis Facility
Purpose: To prepare an outbound shipment to a licensed cannabis facility.
Process Oversight and Validation Responsibility: ICM
Tasking Assigned Responsibility: ICM
Products Used: CCTT System (transport manifest generation), Printer
Step 1: Notify the Department of pending cannabis shipment.
Step 2: Prepare transportation manifest within the CCTT system.
Step 3: Coordinate outbound shipment with receiving cannabis facility in accordance with approved transportation SOPs.

Production Control

Production control ensures that harvested supply meets market demand. Bask Ventures, Inc. does not want to create an undersupply of usable products, as this would create lost opportunities, lost revenues, and potentially endanger the wellbeing of consumers. Likewise, Bask Ventures, Inc. wants to avoid creating an oversupply of products that could result in a waste of capital and resources, greater potential for product diversion, and destruction of the product, which affects the company's potential profitability. A balance must be established to create proper and effective levels of business output. Bask Ventures, Inc.'s three primary strategies for controlling production are management control, inventory control and quality control.

Management Control

Management control is the first area of emphasis used to create and establish effective facility production controls. The success of a business starts at the top with management. Managers will plan, organize, staff, and direct the processes and activities in the facility. They will set standards, goals and objectives, and measure performance and outcomes. Management will take corrective action as needed. Open communication and feedback are crucial in assisting in the evaluation of outcomes and performance.

Planning is important to effectively interpret market demands and needs. Bask Ventures, Inc. understands adult-use cannabis is a relatively new and unproven industry in California with several unknowns. Bask Ventures, Inc. will establish projections and create a conservative production approach to its cultivation operations that ensures production meets initial market demand. As California's market stabilizes, and program compliance evolves, production will be altered to successfully address the changing marketplace.

Bask Ventures, Inc. will employ an expansion plan in the facility capable of responding effectively to anticipated increases in market demands and updates to laws and regulations. Bask Ventures, Inc.'s goal is to stay abreast of demand while bringing consistently high yields to market. With the help of Medicine Man Technologies (MMT), their selected cultivation consultant, Bask Ventures, Inc. will implement a Variable Capacity, Continuous Harvest (VCCH) approach. VCCH is a manufacturing approach to growing cannabis that creates a continuous flow of produce throughout the year with the ability to scale production up or down to meet changing market needs and demands. Where many growers take a crop from beginning to end, have one or two big harvests and then start all over, creating large time gaps in production, VCCH staggers harvest times, providing consistent daily harvests.

VCCH ensures initial supply meets hyped-up market demands, anticipating potential product supply shortages as the energized public eagerly consumes initial inventory. Implementing a VCCH system at the onset of production will ensure a continuing inventory with minimal impact to the initial and subsequent supply chain.

Facility design and organization are critical for maintaining consistent procedures and remaining compliant with all applicable regulations. Through adoption of MMT's processes and industry best practices, Bask Ventures, Inc. will set up the facility to support VCCH. Operations will take a clinical approach to cultivation, utilizing room design concepts that support clean, sterile growing environments. The facility will be designed and organized to support effective

workflow and to remove production bottlenecks. The design will take manpower into consideration and the flow of work will be conducive to a well-run operation. Bask Ventures, Inc. will establish a set of standard operating procedures (SOPs) provided by MMT, which include logs and recordkeeping mechanisms that facilitate efficient and organized operations.

Properly hiring, training and developing staff members, then utilizing that staff efficiently, will promote effective production control. Based on financial projections and the metrics used to determine a conservative production capacity to start, Bask Ventures, Inc. can forecast the number of employees required to staff the facility. MMT has provided job descriptions, job qualifications, necessary experience and education profiles, as well as an organizational chart. Bask Ventures, Inc. will create a business culture where employees will be experts in their trained position. Exceptional staff will be cross-trained across all departments to create a well-rounded, interchangeable employee workforce.

Inventory Control

Managing inventory is the second consideration in establishing effective production control. Bask Ventures, Inc. will tightly control the supply chain and manage the logistics of incoming and outbound products so that all inventory remains accounted for.

Many products go into cultivating cannabis, requiring bulk orders and stocked inventory of, for example, grow media, perlite, pots, nutrients, pesticides and herbicides, gloves, trolleys, pallet jacks, spray bottles, tools, clothing, safety gear, hoses, wands, flow meters, DTS meters, etc. Bask Ventures, Inc. has created an initial equipment and useable compounds list including items required in the process of growing marijuana, to be consistently maintained by the Inventory Control Manager in conjunction with the Cultivation Manager. All items used for operations will be included in the facility inventory, used to anticipate the supply inventory and ensure all equipment is available when required.

The California Cannabis Track and Trace (CCTT) system software will be programmed to include materials ordered from vendors. Bask Ventures, Inc. will perform daily and weekly inventory audits to ensure Bask Ventures, Inc. has required amounts of inventory items on hand for use. The CCTT system will also provide Bask Ventures, Inc., in real time, information on the location of all mothers, clones and plants in the facility. The CCTT system creates reports that Bask Ventures, Inc. can use to assist with production planning and share with the State, as requested.

Quality Control

Quality control (QC) is the third and final consideration in effective production control. The Quality Assurance Manager (QAM) will ensure Bask Ventures, Inc. is maintaining facility QC compliance and providing safe, high-quality product that meets consumers' needs. QC protocols ensure that best management practices are being adhered to and good communication exists among and between teams in the cultivation facility. Bask Ventures, Inc. will enforce quality centric SOPs through reoccurring and randomly performed QC checks throughout the facility. Every cultivation team member will be trained on their unique QC responsibilities and will be expected to uphold the Bask Ventures, Inc.'s strict QC standards in every aspect of their position.

Plants will be reviewed for quality throughout their life cycle. Through proper plant handling, contamination prevention, pest management, environmental controls, and staff training, Bask Ventures, Inc. will create a proactive approach to QC and reduce the potential for pest outbreaks or other crop loss. The cultivation team will water and tend the garden by hand, allowing for sustained visual scrutiny of each individual plant. The cultivation team will perform QC checks as they are cloning, topping, pruning, repotting, feeding, scouting and generally working with the plants. Marijuana plants can fall prey to potentially hundreds of different pests and microbial threats or outbreaks that can harm or kill them. This requires the cultivation team to continuously scout for and immediately address any issues that arise.

The Harvest Team will be responsible for performing visual QC checks as they remove waste stems and leaves from harvested plants. As the harvested marijuana is dried and cured, final QC checks are performed by the team and the QAM; should an issue be detected post-harvest, the potentially contaminated product will be physically segregated and designated in the CCTT system as being on hold. The Cultivation Manager and QAM will decide if the contamination is clear and present, what the contamination is, and if the product requires destruction. The cultivation team will be prompted to inspect the specific room the plant was harvested from and determine if any other plants in that room are contaminated. If so, the room will be quarantined and sanitized. Contaminated items will be quarantined and destroyed according to the Bask Ventures, Inc.'s Waste Disposal Management SOPs.

Through management control, inventory control and quality control, Bask Ventures, Inc. is confident that they will meet the challenges and demands of an unknown marketplace to provide an uninterrupted supply of consistently safe and effective cannabis.

Cultivation Methods and Best Practices

Bask Ventures, Inc. understands the need to produce safe, consistent, repeatable cultivation results using a variety of genetics to efficiently and methodically grow cannabis that provides superior treatments for patients. Bask Ventures, Inc. has teamed up with Medicine Man Technologies, a full-service cannabis consulting company, to customize best practices and methods for the cultivation facility. Bask Ventures, Inc. will implement techniques that have demonstrated success in producing reliably consistent, safe cannabis. Cultivation agents will be thoroughly trained and must demonstrate adequate understanding and knowledge of adopted practices before being permitted to work to ensure standard operating procedures (SOPs) are implemented precisely and consistently.

Bask Ventures, Inc. will deploy a Variable Capacity, Continuous Harvest cultivation model (VCCH). VCCH provides for a steady, uninterrupted supply of cannabis by implementing consistent cultivation methods that allow for precise scheduling of staggered harvest times. The following nine components are vital to executing a successful VCCH operation:

1. Maintaining proper temperature throughout the plant life cycle.
2. Maintaining proper humidity throughout the plant life cycle.
3. Maintaining proper CO_2 levels throughout the plant life cycle.
4. Efficient facility and room design to maximize workflow and plant productivity while minimizing waste and environmental impact.
5. Utilizing state-of-the-art equipment and tools that are properly serviced, maintained, and sanitized.
6. Maintaining a diverse and healthy pool of plant genetics to address the wide spectrum of patients' medical conditions and their symptoms.
7. Ensuring proper storage, handling, use, and disposal of pesticides, nutrients, and growth additives and associated water usage and wastewater management.
8. Ensuring proper plant husbandry techniques, specifically manicuring and pruning, to develop a healthy, high-quality, high-yielding crop.
9. Human interaction and, most importantly, love.

Facility Design

The foundation for a safe, secure, contaminant-free, and productive cultivation facility begins with proper design. In order to produce high-quality, safe, consistently repeatable cannabis and cannabis products a facility needs to employ an efficient process flow that proactively accounts for each phase of the plant life cycle. To accomplish this, Bask Ventures, Inc. has retained Medicine Man Technologies (MMT) to assist with the designs, organization, and operational expertise needed to deploy a world-class cultivation facility. MMT has been at the forefront of the cannabis cultivation industry in Colorado and other states since 2009. They have successfully implemented SOPs using the VCCH model, in which the entire cultivation process is engineered to ensure exact and consistent input, equating to exact and consistent output. These tested and proven SOPs will be provided to and tailored for the Bask Ventures, Inc., along with robust, hands-on training for its managers and key employees. Together, MMT and Bask Ventures, Inc. will establish a foundation for the cultivation facility that ensures compliance with the State's regulatory requirments.

Facility Construction

Pursuant to 16 CCR § 5502, *Cultivation Plan Requirements,* Bask Ventures, Inc. has developed a cultivation plan that includes a detailed diagram of the premises. Bask Ventures, Inc.'s cultivation facility will be designed to reduce the risk of contamination using special construction materials, equipment selection, and environmental controls. An integrated pest management (IPM) plan detailing product names and active ingredients for any used pesticides during any stage of plant growth along with integrated pest management protocols including chemical, biological, and physical methods used to control or prevent the introduction of pests on the cultivation site has been fully developed for implementation.

Controlling environmental variables within the facility, particularly within the vegetative, flower, dry, and cure rooms, will be critical to ensuring that no single factor negatively affects cannabis plants or harvested cannabis. Bask Ventures, Inc. will install a system to monitor, record, and/or automatically regulate the following conditions:

- Temperature
- CO_2
- Humidity
- Ventilation
- Lighting
- Water Supply

Bask Ventures, Inc.'s construction and equipment criteria will ensure that:

- Interior/exterior room walls will be constructed with galvanized steel framing and finished with a fiberglass-reinforced polyester resin panel (NUDO ® or similar) that is antimicrobial, high-moisture resistant, impact resistant, and Class A fire-rated. These panels have a reflective white color and smooth texture, free from cracks and holes and do not shed particulate matter. The floors will be a polished concrete and, where necessary, an antimicrobial cementitious urethane floor coating will be utilized for added slip resistance.
- Organic-surface materials (e.g., wood) for framing and walls will be limited to minimize the risk of harboring pests and other pathogens, and to prevent deterioration under high moisture conditions.
- Interior work surfaces, including mechanical gear, tables, racks and fixtures, will be manufactured of aluminum or stainless steel that that will be easy to clean and maintain free of contaminants.
- STULZ Cyberone HVAC units (or similar suitable substitutes) for all plant work areas and vegetative, flowering, dry and cure rooms that will manage temperature, humidity, and CO_2 levels to temper the rooms and create an exceptionally clean environment. The units are also capable of providing electrostatic and UVC filtration to further mitigate airborne pests and pathogens within the facility.
- Electrical pipe work, HVAC ducting, lighting fixtures, hoods, tables fixtures and ventilation points will be easy to clean and maintain in accordance with their manufacturer recommending schedules.

Growing Medium

Bask Ventures, Inc. will use different growing media tailored for the varying phases of the plant life cycle:

1. *Clone*: 1.5 x 1.5" Rockwool Cube
2. *Clone-Early Vegetative Transition*: 4 x 4" or 6 x 6" Rockwool Cube
3. *Vegetative through Flower*: hydroponic mix of CANNA COCO (ground up coconut husks) and Perlite (volcanic glass derivative used for aeration and improvement of water drainage); specific ratio adjusts depending on seasonality or the use of ProMix® hydroponic mixes in combination with Perlite.

Nutrient and Fertilizer Practice

Bask Ventures, Inc. has selected Success Nutrients™, a nine-part nutrient line composed of all the macro- and micronutrients found to produce the most prolific cannabis plants, while remaining safe and consistent for use throughout the entire plant lifecycle. Below is a summary of the nine-part line, as well as additional growth additives occasionally used throughout the life cycle to support the healthy growth of the plants.

1. Success Blast Off ™

Product Description: Success Blast Off is formulated to promote root and plant growth in the vegetative and beginning part of the flower phase. It is used in conjunction with Success Nutrients plant food and supplements. Success Blast Off is very effective in both soil and hydroponic gardens.

2. Success Micro™

Product Description: Success Micro is formulated to provide plants with Nitrogen, Potassium and Calcium for the base of every feed. This will deliver essential micronutrients to the plants in both the vegetative and flowering phases. Use in conjunction with Success Flowers™ and Success Trees™ for the best results.

3. Success Trees™

Product Description: Success Trees is formulated to compliment plants in both the vegetative and flowering phases. Use in conjunction with Success Flowers and Success Micro™ for the best results.

4. Success Flowers™

Product Description: Success Flowers is formulated to compliment plants in both the vegetative and flowering phases. Use in conjunction with Success Trees and Success Micro for the best results.

5. Success Silica™

Product Description: Success Silica is a beneficial supplement to be used in conjunction with Success Nutrients plant and food supplements. The strong plant tissue is generated from higher levels of Silicate that helps the plants flourish in adverse environmental conditions such as heat, drought, or frost.

6. Success Flame™

Product Description: Success Flame is formulated to enhance fruit, flower, and bud development throughout the flowering phase of a plant's life cycle. Use in conjunction with Success Nutrients plant food and supplements.

7. Success Sugar™
Product Description: Success Sugar is specially formulated to produce beneficial results for all phases of plant growth. Use in conjunction with Success Nutrients plant food and supplements.

8. Success Balance™
Product Description: Success Balance is a highly fortified calcium, magnesium, and iron plant supplement designed to correct common deficiencies in both vegetative and flowering phases. Use in conjunction with Success Nutrients plant food and supplements.

9. Success Game Time™
Product Description: Success Game Time is a concentrated plant food supplement formulated to boost flower size immensely while finishing the flowering phase. In addition, it is designed to enhance the production of essential oils and fragrance. Use in conjunction with Success Nutrients plant food and supplements.

10. SUPERthrive®
Product Description: SUPERthrive is a highly concentrated non-toxic vitamin solution invigorating all variety of greenery for home gardeners and professionals alike. SUPERthrive maximizes potential by quickly building a strong root base and reducing transplant shock. SUPERthrive replenishes the soil to nourish and encourage the natural building blocks that plants make themselves under optimum conditions.

11. Nutrilife SM-90
Product Description: Nutrilife SM-90 is a multi-purpose wetting agent that improves spray coverage in soil and on plants to increase the speed of moisture penetration in soils and growing media. When added in small quantities to plant nutrient solutions, new root growth quickly emerges. Treated plants develop a larger and healthier root area resulting in improved overall plant health.

12. Clonex® Rooting Hormone Gel
Product Description: Clonex is a high-performance rooting compound. Clonex Gel will remain in contact around the stem, sealing the cut tissue instantly and supplying the hormones needed to promote root cell development, and vitamins to protect the delicate new root tissue.

13. Mycorrhiza™
Product Description: These beneficial fungi greatly increase the effective rooting area of plants thereby enhancing plant growth, vigor and tolerance of environmental extremes. Mycorrhizal fungi colonize roots and extend into the surrounding soil forming an essential link between plant and soil resources. They greatly increase the root's ability to absorb water and nutrients, while improving plant survival, vigor and health.

Nutrient, Fertilizer, and Growth Additive Records
Bask Ventures, Inc. will maintain records of the type and amounts of fertilizer and any growth additives used in the cultivation process. The Cultivation Manager will be responsible for

maintaining all cultivation records onsite according to Bask Ventures, Inc.'s Recordkeeping policies and procedures.

Watering Plants

Bask Ventures, Inc. will utilize a reverse osmosis water filtration system (RO) with an associated large-capacity storage tank. The RO purifies water using a semipermeable membrane to remove ions, molecules, and larger particles from tap water, ensuring a consistent aseptic base for feeding regimens. Hydrating the plants with a purified water base directly translates to the reduction of potential bacteria and other contaminants in the resulting harvest. Bask Ventures, Inc. will treat and dispose all generated wastewater in accordance with applicable laws and regulations. Bask Ventures, Inc. will consider installing a wastewater recycling treatment plan if it proves economically advantageous and feasible.

Cannabis Handling

Bask Ventures, Inc. will instill a culture dedicated to sanitation and safety in our pursuit to produce
the highest quality cannabis. Bask Ventures, Inc. will require all employees who come into direct contact with cannabis to be trained in food handling techniques and will be subject to the same requirements as any commercial kitchen staff. In addition, Bask Ventures, Inc. will provide the cultivation team employees with company uniforms and locker space; employees will be required to change at the beginning and end of each shift to minimize the risk of contamination. Please see Bask Ventures, Inc.'s Sanitation Plan for detailed policies and procedures.

Cultivation Standard Operating Procedures

The cultivation process is divided into multiple phases mirroring the plant life cycle, all of which have dedicated SOPs. The full set of cultivation SOPs will be maintained by the Cultivation Manager and Quality Assurance Manager and provided to each new hire during training. Changes to procedures will be documented and employees will have their training updated before applying the procedural change throughout the facility. Confirmation of this training will be recorded and maintained in the employee files according to Bask Ventures, Inc.'s standard recordkeeping SOPs.

1. Cloning

Purpose: To create new immature cannabis plants by taking cuttings of select cannabis plants and encouraging root growth and development. Retention of certain genetic strain traits is key and can be accomplished through effective cloning methods.
Process Oversight and Validation Responsibility: Cultivation Manager
Tasking Assigned Responsibility: Lead Cultivation Agents
Products Used: Nitrile Gloves, Scissors, Clone Dome, 1.5 x 1.5" Rockwool Cubes
Nutrients/Growth Additives Used: Clonex Rooting Hormone Gel
Preferred Temperature Range: 77-79°F
Preferred Humidity Range: 70-80% during transfer to vegetative phase (12-24 hours)
Preferred CO_2 Level: N/A
Step 1: Identify the best plants for cloning, typically the strongest and healthiest plants.

Step 2: When selecting a branch to remove for cloning, keep in mind that skinny, lower branches will be stronger in the long run and will also take root much quicker. Always take clones with extremely sharp scissors and sterilize scissors between cuttings.
Step 3: After determining which branch to remove, make the cut at a 45° angle to the stem. The cutting is at its most fragile state at this point, so moving quickly through the next steps will be critical to minimize shock.
Step 4: Submerge the cutting into root stimulator.
Step 5: Gently, but firmly, place the cutting into a 1.5 x 1.5" Rockwool cube about 1" down. This will ensure a solid foundation for the young plant.
Step 6: Place cubed cuttings into the clone dome. Be sure to check under the clone dome every other day to allow fresh air and new humidity to circulate. Different strains will root at different speeds, generally from 8 – 14 days.

2. Transplant Clones

Purpose: To move clones out of their original 1.5 x 1.5" Rockwool cubes within the clone dome into larger 4 x 4" or 6 x 6" Rockwool Cubes, stimulating additional root growth. A very sensitive and fragile step that should be executed with the utmost care.
Process Oversight and Validation Responsibility: Cultivation Manager
Tasking Assigned Responsibility: Lead Cultivation Agents
Products Used: Nitrile Gloves, 4 x 4" Rockwool Cubes, 6 x 6" Rockwool Cubes
Preferred Temperature Range: 77-79°F
Preferred Humidity Range: 70-80% during transfer to vegetative phase (12-24 hours)
Preferred CO_2 Level: N/A
Nutrients/Growth Additives Used: Success Micro, Success Trees, Success Flowers, Success Blast Off, SUPERthrive, Success Balance
Step 1: Confirm that it is time to move clones out of the dome. Depending on which genetic strain is being grown, roots should begin to emerge 8-11 days from the time the clone was taken. Once roots have emerged, it is time to transplant the clone into its new environment.
Step 2: Prepare the clone dome and clones for transplanting into 4 x 4" or 6 x 6" Rockwool Cubes, depending on the needs of the genetic strain.
Step 3: Power up the room humidifier to begin raising humidity levels.
Step 4: Submerge the cubes into 70°F RO water and wait 15-30 minutes to soak thoroughly.
Step 5: Remove each cube from the water. Squeeze cube to release as much water as possible (around 75%).
Step 6: Place cubes in tray under designated LED or similar lights. Decrease light output to 60% during the first 24 hours, returning to normal on day 2 or 3 depending on rate of acclimation.
Step 7: Carefully and gently move all clones out of the dome and plug them into the Rockwool Cubes.
Step 8: Water and feed plants according to Clone Transplant feeding schedule. Legally treat and dispose of generated wastewater.
Step 9: Maintain records of the type and amounts of nutrients, fertilizer, and any growth additives used.
Step 10: Aggregate any plant waste and dispose of per Waste Disposal SOPs.

3. Final Transplant (Rockwool Cubes to 7-Gallon Pot)

Purpose: To develop maximum root growth on young plants that have completed their initial rooting and begun their early vegetative process before transitioning them into the flowering phase.
Process Oversight and Validation Responsibility: Cultivation Manager
Tasking Assigned Responsibility: Lead Cultivation Agents, Cultivation Agents
Products Used: Nitrile Gloves, Growing Medium, 7-Gallon Pot
Nutrients/Growth Additives Used: Success Micro, Success Trees, Success Flowers, Success Blast Off, SUPERthrive, Success Balance
Step 1: Confirm that it is time to move the plants into a pot. Once a few roots have developed underneath the cube, it is time to transplant. This ensures the roots have optimum space for growth.
Step 2: Fill 7-gallon pot with growing medium and gently pat down while filling. Be sure to leave enough space for a 4" x 4" or 6" x 6" Rockwool Cube to sit comfortably.
Step 3: Place Rockwool Cube in pot.
Step 4: Spread Mycorrhiza™ over top of soil.
Step 5: Fill remaining space in bucket with growing medium. Gently pat down all growing medium until 4" x 4" or 6" x 6" Rockwool Cube is completely covered.
Step 6: Water and feed plants according to Early Vegetative feeding schedule. Legally treat and dispose of the generated wastewater.
Step 7: Maintain records of the type and amounts of nutrients, fertilizer, and any growth additives used.
Step 8: Aggregate any plant waste and dispose of per Waste Disposal SOPs.

4. Vegetative Plant Maintenance (Environment, Scouting, Tending, Feeding)
Purpose: Maintain the health and optimal environment of the vegetative room(s) and plants.
Process Oversight and Validation Responsibility: Cultivation Manager
Tasking Assigned Responsibility: Lead Cultivation Agents, Cultivation Agents
Products Used: Nitrile Gloves, Scissors, Green LED Headlamps
Preferred Temperature Range: 78-81°F during light period (daytime), 70-71°F during dark period (nighttime)
Preferred Humidity Range: 55% throughout remainder of vegetative phase
Preferred CO_2 Level: N/A
Nutrients/Growth Additives Used: Success Micro, Success Trees, Success Flowers, Success Blast Off, SUPERthrive, Success Balance, Success Sugar, Success Silica, Nutrilife SM-90
Step 1: On a regularly scheduled basis (e.g., Monday, Wednesday, Friday), evaluate the vegetative room balance. Visually inspect and actively scout vegetative tables and racks to ensure that growing plants have no visible mold, mildew, pests, rot, or grey or black plant matter that is greater than an acceptable level.
Step 2: Visually ensure plant canopy is developing evenly through gentle tending and pruning of plants to ensure uniformity and consistency throughout the veg racks.
Step 3: Water and feed vegetative plants according to varying vegetative phase feeding schedules. Flush vegetative plants according to varying vegetative phase flush schedules. Legally treat and dispose of generated wastewater.
Step 4: Maintain records of the type and amounts of nutrients, fertilizer, and any growth additives used.
Step 5: Aggregate any plant waste and dispose of per Waste Disposal SOPs.

5. Vegetative Plant Pruning

Purpose: Allows a cultivation team to shape plants, encouraging them to grow to a specific size and shape. Facilitates a quicker and more efficient vegetative cycle. Topping (cutting off the very top of the plant) encourages plants to grow wide instead of tall, creating an even canopy and optimizing grow space within the plant block. This fills the canopy, maximizing yield per light. Up-dressing is the process of pruning low-hanging leaves and branches from the bottom up, ensuring that plant material does not touch the grow medium while also encouraging upward growth.
Process Oversight and Validation Responsibility: Lead Cultivation Agent
Tasking Assigned Responsibility: Cultivation Agent
Products Used: Nitrile Gloves, Scissors
Nutrients/Growth Additives Used: N/A
Step 1: Evaluate the vegetative room, identifying a consistent canopy level that the majority of plants exceed.
Step 2: Once the preferred canopy level is identified, trim all stems and branches to the desired canopy height.
Step 3: Up-dress vegetative plants between week 4 and week 6. This will re-focus the plant energy towards building new tops, preparing them for the flowering phase. The process of pruning may occur every 5-7 days depending on the rate of growth.
Step 4: Aggregate any plant waste and dispose of per Waste Disposal SOPs.

6. Transition to Flowering Phase

Purpose: To move cannabis plants from a vegetative phase to a flowering phase, where they will begin to product flowers, or "buds"
Process Oversight and Validation Responsibility: Cultivation Manager
Tasking Assigned Responsibility: Lead Cultivation Agent, Cultivation Agent
Products Used: Nitrile Gloves
Nutrients/Growth Additives Used: N/A
Step 1: Visually inspect the vegetative canopy to verify that it is, at a minimum, 75% full. This will leave room for continued growth as most genetic strains will at least double in size by the end of the flowering phase. If a nearly-full canopy has not been achieved, continue to focus on widening plants through the vegetative plant pruning process identified above. Be careful to not over-prune as plants may respond negatively.
Step 2: Physically move plants from a vegetative room to a flowering room, paying the utmost attention to sanitation to prevent any cross-contamination within the facility.
Step 3: Aggregate any plant waste and dispose of per Waste Disposal SOPs.

7. Flowering Plant Maintenance (Environment, Scouting, Tending, Feeding)

Purpose: Maintain the health and environmental balance of the flowering room(s) and plants.
Process Oversight and Validation Responsibility: Cultivation Manager
Tasking Assigned Responsibility: Lead Cultivation Agents, Cultivation Agents
Products Used: Nitrile Gloves, Scissors, Green LED Headlamps
Preferred Temperature Range: Week 1-4: 78-81°F during daytime, 70-71°F during nighttime. Week 5-8: 79-83°F during daytime, 69-71°F during nighttime. Week 9-10: 78-82°F during daytime, 68-70°F during nighttime.

Preferred Humidity Range: 53-57% throughout the flowering phase
Preferred CO_2 Level: No greater than 1500 ppm during daytime, reduce during nighttime to typically 400 ppm
Nutrients/Growth Additives Used: Success Micro, Success Trees, Success Flowers, Success Blast Off, Success Balance, Success Sugar, Success Silica, Success Flame, Success Game Time
Step 1: On a regularly scheduled basis (e.g., Monday, Wednesday, Friday), evaluate the flowering room balance. Visually inspect and actively scout flowering tables and racks to ensure that growing plants have no visible mold, mildew, pests, rot, or grey or black plant matter that is greater than an acceptable level.
Step 2: Encourage even canopy development through gentle tending and pruning of plants to ensure uniformity and consistency throughout the tables and racks.
Step 3: Actively tie down flowering plants to further develop a consistent canopy while actively pruning and up-dressing lower plant foliage. This added support will enable the plants to focus their energy on flower production.
Step 4: Water and feed flowering plants according to varying flowering phase feeding schedules. Flush flowering plants according to varying flowering phase flush schedules. Legally treat and dispose of the generated wastewater.
Step 5: Maintain records of the type and amounts of nutrients, fertilizer, and any growth additives used.
Step 6: Aggregate any plant waste and dispose of per Waste Disposal SOPs.

8. Harvest
Purpose: To harvest mature cannabis plants
Process Oversight and Validation Responsibility: Cultivation Manager
Tasking Assigned Responsibility: Harvest Team Lead, Cultivation Agents, Inventory Control Manager (ICM)
Products Used: Nitrile Gloves, Weighing Tray, Calibrated Scale
Step 1: Prior to harvest, visually inspect and actively scout flowering tables and racks to ensure that growing plants have no visible mold, mildew, pests, rot, or grey or black plant matter that is greater than an acceptable level.
Step 2: Remove plants and pot containers from the flowering room and stage them for harvest.
Step 3: Record total plant weight in the CCTT system.
Step 4: Aggregate any plant waste collected during the harvest process and dispose of per Waste Disposal SOPs.

9. Trimming Process
Purpose: Remove stems and fan leaves from plants and effectively trim them to collect finished buds and tight trim for processing.
Process Oversight and Validation Responsibility: Harvest Team Lead
Tasking Assigned Responsibility: Trimmer
Products Used: Nitrile Gloves, Scissors, Weighing Tray, Calibrated Scales, Machine Trimmer
Step 1: Trim the fan leaves from the plant. Remove stems by cutting them as close to each bud as possible. Aggregate waste stalks, stems, and fan leaves; determine weight and record in the CCTTsystem.
Step 2: Carefully run remaining cannabis through the machine trimmer, capturing finished buds and tight trim. Determine wet bud weight using the calibrated scale and record it in the

CCTTsystem. Determine wet trim weight using the calibrated scale and record it in the CCTTsystem.
Step 3: Aggregate any non-usable plant waste collected during the trimming process and dispose of per Waste Disposal SOPs.

10. Drying Process
Purpose: To remove excess moisture from trimmed cannabis flower.
Process Oversight and Validation Responsibility: Harvest Team Lead
Tasking Assigned Responsibility: Dry/Cure Team
Products Used: Nitrile Gloves, Weighing Tray, Calibrated Scales, Stainless Steel Dry Racks
Step 1: Space cannabis buds and trim on the stainless steel drying racks along with the associated RFID tag(s) for each batch. Monitor and agitate the buds daily for 7-10 days to check for quality control concerns such as mold, mildew, or other issues, and prevent flat spots or uneven moisture.
Step 2: Determine dry bud weight using the calibrated scale and record in the CCTTsystem. Determine dry trim weight using the calibrated scale and record in the CCTT system.
Step 3: Aggregate any plant waste collected during the drying process and dispose of per Waste Disposal SOPs.

11. Curing Process
Purpose: To prepare dry cannabis buds for consumption through prolonged, controlled ventilation (curing), yielding a consistent moisture content throughout the plant material and drastically improving the flavor of the cannabis.
Process Oversight and Validation Responsibility: Harvest Team Lead, Quality Assurance Manager (QAM)
Tasking Assigned Responsibility: Dry/Cure Team
Products Used: Nitrile Gloves, Weighing Tray, Cure Buckets
Step 1: Place dried cannabis in an airtight, opaque cure bucket or other container along with its associated RFID tag(s).
Step 2: Ventilate containers for 30 minutes at a time, 3-4 times a week, over the course of 2-4 weeks to allow built up gases and residual moisture to escape. The QAM will confirm the when the batch has passed all internal quality control checks and is considered fully cured.
Step 3: Determine final cured bud weight using the calibrated scale and record it in the CCTT system. Prepare for packaging.
Step 4: Aggregate any plant waste collected during the curing process and dispose of per Waste Disposal SOPs.

Cultivation Records
Bask Ventures, Inc.'s cultivation SOPs require the maintenance of meticulous records for each plant through every phase of growth, from seed (or clone) to packaged cannabis shipment. Comprehensive records will provide auditable activity histories documenting that each step through cultivation, harvest, and packaging has been adequately performed to predetermined specifications.

Production records will thoroughly document every interaction with the plants, including planting, fertilizer applications, pesticide applications, harvesting, curing, weighing, packaging,

and labeling. Monitoring records will be kept to confirm that cultivation standards are meeting Bask Ventures, Inc.'s internal and external quality and production control guidelines. Soil amendments, fertilizers, pesticides, nutrients or other chemicals or inputs applied to the growing medium or plants or otherwise used in the process of growing cannabis will be tracked through inclusion in product management, pesticide application, fertilizer application, and daily inspections. Manual logs will include:

- Clone Log
- Destruction and Disposal Log
- Equipment Maintenance Log
- HVAC Log
- Lighting Log
- Pesticide, Fertilizer and Chemical Applications Log
- Sanitation Log
- Water Supply Log

Safety Data Sheets (SDS) will document critical information on all solutions used in the facility including cleaning products, nutrients, herbicides, and other pesticides. Bask Ventures, Inc. will maintain a comprehensive database of all safety data sheets in both hard copy and electronic scanned copies on site. Hard copies of the SDS for all used substances will be readily available in each cultivation room in a designated SDS binder. Employees will be required to read SDS for every chemical they use.

As required by 3 CCR§8400, Bask Ventures, Inc. will keep and maintain records for at least seven (7) years from the date they were created. Records will be legible and will be stored in a secured area where they are protected from debris, moisture, contamination, hazardous waste, fire, and theft. Bask Ventures, Inc. understands that all records are subject to review by the Department. Bask Ventures, Inc. will maintain the following records on the licensed premises and make them available to the Department on request:

1. Department issued cultivation license(s);
2. Cultivation plan;
3. Records evidencing compliance with environmental protection measures pursuant to §§ 8304, 8305, 8306, and 8307;
4. Supporting documentation for data or information input in to the CCTT system;
5. All UIDs assigned to product in inventory and all unassigned UIDs.
    a. UIDs associated with product that has been retired from the CCTT system will be retained for six (6) months after the date the tags were retired;
6. Financial records related to the licensed commercial cannabis activity, including bank statements, tax records, sales invoices, and sales receipts;
7. Personnel records, including each employee's full name, social security, or individual tx payer ID number, date of beginning employment, and termination date (if applicable);
8. Records related to employee CCTT system training, including the date(s) training occurred, description of the training provided, and the names of the employees who received training;
9. Contracts with other state licensed cannabis businesses;
10. Permits, licenses, and other local authorizations to conduct the licensee's commercial cannabis activity;

11. Records associated with composting or disposal of cannabis waste; and
12. Documentation associated with loss of access to the CCTT system prepared pursuant to § 8402(d).

Sample Strain List

Strain	(Est.) THC%	(Est.) CBD%	(Est. Ratio) Sativa/Indica
CBD God	15.00	10.00-16.00	65/35
Super Silver Haze	8.00-14.00	8.00-14.00	70/30
Pennywise	11.00	13.00	20/80
Great White Shark CBD	7.00-10.00	7.00-10.00	30/70
Harlequin Bx4	10.00	10.00	75/25
Hurkle	11.50	9.00	40/60
Master Kush	22.00	8.00	30/70
Mango Skunk	15.00-20.00	3.00-6.00	20/80
Black Blood	18.00	5.00	40/60
Blue Dream	18.00	0.00	80/20
White Widow	18.76	0.10	40/60
Bubba Kush	18.00	4.00	10/90
Northern Lights	20.00	3.00	20/80
Train Wreck	21.00	3.00	20/80
Go Time	17.00	2.00	65/35
Super Lemon Haze	19.33	0.21	70/30
White Rhino	20.19	0.11	20/80

Cannabinoids are the primary chemical compounds produced by the Cannabis (marijuana) plant. Cannabis plants can exhibit wide variation in the quantity and type of cannabinoids they produce. The mixture of cannabinoids produced by a plant is known as its cannabinoid profile. A plant's cannabinoid profile determines why some strains may treat a specific ailment while others may offer no benefit at all.

Cannabinoids are naturally occurring compounds in the cannabis plant with potential antioxidant and neuroprotective functions. Cannabinoids may assist an individual's body to promote healthy regulation of the central nervous, immune, and endocannabinoid systems. Presently, there are more than 113 identified cannabinoids. Tetrahydrocannabinol (THC) is the most well-known of these and is the primary psychoactive cannabinoid. Cannabidiol (CBD) is the most widely known non-psychoactive cannabinoid.

Much research and consideration has gone into deciding the appropriate strains to be grown at the facility. Bask Ventures, Inc. has identified specific strains that span the entire cannabinoid profile and offer a wide spectrum of potential medical benefits. Indica strains are known for being physically sedating, while Sativas typically provide more invigorating, uplifting, cerebral effects. Hybrids fall somewhere in-between depending on traits inherited through propagation.

While some strain names may appear strange, Bask Ventures, Inc. chose strains based on their desired effects and cannabinoid profile. Strains have been bred and hybridized by breeders to achieve desired characteristics for decades. Often strains are renamed not only to help emphasize the strain's unique characteristics but also to provide distinct and memorable monikers to distinguish them from competitors or to capitalize on a strain's historical reputation of success.

Nutrient and Additive Practices

Bask Ventures, Inc. has established a nutrient and additive practice for the appropriate and proper use of the nutrients necessary to ensure the viability and healthy growth of cannabis plants. Bask Ventures, Inc.'s customized nutrient management plan incorporates industry best practices to control the use of plant nutrients for robust plant growth and water quality protection. Proper nutrient and additive applications will help ensure the safety of the finished consumer product, facility employees, and the local environment.

Bask Ventures, Inc.'s processes include:

1. Use of appropriate nutrient practices;
2. Use of an approved fertilizer or hydroponic solution of a type, formulation, and at a rate to support healthy growth of plants;
3. Treatment and disposal of the wastewater generated from the cultivation of cannabis in accordance with industry best practices, applicable laws and regulations;
4. Record maintenance of the type and amounts of fertilizer and any growth additives used.

Bask Ventures, Inc. will utilize the California Cannabis Track and Trace (CCTT) system to catalog all crop inputs utilized throughout the plant life cycle. Crop inputs may represent grow media, nutrients, agricultural chemicals, or any other substances that are used for pest control or soil fertility management. Bask Ventures, Inc. will only utilize agricultural chemicals (pesticides, miticides, herbicides and fungicides) approved by the EPA and the State of California. Safety data sheets (SDS) and copies of original labels will be maintained for each agricultural chemical. Each instance of their use will be recorded within an Integrated Pest Management (IPM) log.

Once each crop input has been entered into the CCTT system, individual inputs may be virtually combined into a mixture that specifies the amount of each solution to be applied to plants in each phase of their life cycle. Housing these standardized mixture formulas within the CCTT system allows any authorized cultivation employee to confirm exactly what nutrient, pesticide, or other formula to use based on the growth phase and unique needs of the plants to be treated. Once the correct mixture is identified, it can then be associated with the individual application within the CCTT system. This automatically creates a full electronic historical record of all crop input applications for every plant throughout its lifetime.

All nutrient and other additive water mixtures will be tested utilizing handheld pH, Parts per Million (PPM) or Total Dissolved Solids (TDS) meters to ensure purity of the water used prior to mixing, and again after mixing to confirm formula accuracy. Bask Ventures, Inc. will also test the plant runoff to get a real-time representation of plant nutrient use and in what proportions, allowing feeding regimens to be continuously adjusted to match the exact needs of the strain being cultivated. Consistent monitoring will help proactively identify problems and make adjustments to the mixture formula, pH, or grow medium immediately before signs of distress become visible on the plants. Bask Ventures, Inc.'s custom nutrient regimens maintain plants in an optimal state of health by continuously balancing their macro and micronutrients.

Every use of additives will be documented on the Nutrient or Growth Additive Log and will include the following information:

- Date and start/end times of feeding

- Treatment site identified in the location legend (e.g., block, room, table),
- Size of area treated,
- Name of the product being applied,
- Total amount applied,
- Dosage or rate of feeding,
- Phase of the cultivation process,
- Employee Name,
- Employee ID number, and
- Copy of nutrient label and SDS sheet.

Standard Operating Procedures (SOPs)
Bask Ventures, Inc. has retained cultivation consultant, Medicine Man Technologies (MMT), experienced in running award-winning cultivation and dispensary operations since 2009 in the legal cannabis industry. MMT specializes in designing, deploying, and operating large, industrial-scale cultivation operations.

Bask Ventures, Inc. will be provided with access to cultivation-based SOPs developed and refined by MMT through their relationship with Medicine Man Production Company, a respected Tier III cultivator and operator based in Denver, Colorado. MMT has created SOPs based on tested nutrient and additive practices implemented with proven results. Bask Ventures, Inc. will work with MMT to customize SOPs to the needs of the proposed cultivation facility, including the specific nutrient and additives, the proper use of each product, specifications for application, SDS information, Occupational Safety and Health Administration (OSHA) handling and safety considerations, handling and storage requirements, and the amounts and processes used to introduce them into the cultivation environment, based upon the specifications for each phase of the plant's life cycle. Bask Ventures, Inc. will ensure that SOPs remain compliant with existing and future requirements developed and implemented by the State of California.

Cultivation Performance
Bask Ventures, Inc.'s cultivation consultant is achieving unprecedented productivity and efficiency in their licensed facilities in Colorado. Developing a high-performance cultivation practice takes years of research and development, testing, and risk evaluation. On average, MMT's proven methods produce at least three pounds of dried, cured flower material per 1,000-watt light fixture. MMT will guide Bask Ventures, Inc. through facility deployment, ensuring their highly-productive, highly-efficient processes are put in place at the onset of operations. This includes hands-on training support for Bask Ventures, Inc.'s staff, allowing Bask Ventures, Inc. to quickly adopt MMT's recommended best practices prior to becoming operational. Adoption of these proven cultivation methods will provide speed to market advantages for Bask Ventures, Inc., ensuring Bask Ventures, Inc. is able to satisfy market demand as early as possible. In addition, being able to maximize plant health and yield through the implementation of fully vetted tending and feeding protocols will help mitigate the costly and timely mistakes often made by new cultivation teams upon entering the cannabis industry.

Nutrient and Additive Overview
Bask Ventures, Inc. understands that all nutrients, fertilizers, and pesticides used in the cultivation facility must be registered with the Department of Agriculture prior to use. All

operators and employees will be trained on nutrient and additive practices used in the cultivation operation. Bask Ventures, Inc. will maintain a comprehensive database of all SDS in both hard copy and electronic scanned copies on site. Hard copies of the SDS for the nutrients and additives being used in the facility will be readily available onsite in a designated SDS binder.

Bask Ventures, Inc. has selected Success Nutrients™ as its primary nutrient line for the cultivation facility. Below are the details of all nutrient and growth additives that Bask Ventures, Inc. has selected for use in the cultivation facility. While the primary nutrient line for the facility will be Success Nutrients, there are additional nutrients that aid in successful plant growth and development.

Success Nutrients
Success Nutrients is a nine-part nutrient line that is composed of all macro and micronutrients found to produce the most prolific cannabis plants and will be utilized throughout the entire plant lifecycle. The nutrient line was developed by a leading cannabis grower and agricultural chemist in Colorado, designed specifically for use in the cannabis industry.

1. Success Blast Off ™
Product Description: Success Blast Off is formulated to promote root and plant growth in the vegetative and beginning part of the flower phase. Use in conjunction with Success Nutrients plant food and supplements. Blast Off is very effective in both soil and hydroponic gardens.
Directions for Use: Use with every watering throughout the vegetative phase and weeks 1-3 of the flowering phase. Mix well and adjust pH accordingly. Shake well before each use.
Guaranteed Analysis: Total Nitrogen (N): 1.0%, Available Phosphate (P205): 0.5%, Soluble Potash (K20): 1.0%, Magnesium (Mg): 0.001%.
Product Disclaimer: Use only as directed. Keep away from children. Store in cool, dark place.
Product Website: www.successnutrients.com

2. Success Micro ™
Product Description: Success Micro is formulated to provide plants with Nitrogen, Potassium and Calcium for the base of every feed. This will bring essential micronutrients for both the vegetative and flowering phases. Use in conjunction with Success Flowers™ and Success Trees™ for the best results. Success Micro is very effective in both soil and hydroponic gardens.
Directions for Use: Use with every watering during both vegetative and flowering growth cycles. Mix well and adjust pH accordingly. Shake well before each use.
Guaranteed Analysis: Total Nitrogen (N): 5.0%, Soluble Potash (K20): 1.0%, Calcium (Ca): 5.0%, Boron (B): 0.01%, Cobalt (Co): 0.0005%, Copper (Cu): 0.01%, Iron (Fe): 0.1%, Chelated Manganese (Mn): 0.05%, Molybdenum (Mo): 0.0008%, Zinc (Zn): 0.015%.
Product Disclaimer: Use only as directed. Keep away from children. Store in cool, dark place.
Product Website: www.successnutrients.com

3. Success Trees ™
Product Description: Success Trees is formulated to compliment plants in both the vegetative and flowering phases. Use in conjunction with Success Flowers and Success Micro for the best results. Success Trees is very effective for both soil and hydroponic gardens.

Directions for Use: Use with every watering during both vegetative and flowering growth cycles. Mix well and adjust pH accordingly. Shake well before each use.
Guaranteed Analysis: Total Nitrogen (N): 2.0%, Available Phosphate (P205): 1.0%, Soluble Potash (K20): 6.0%, Magnesium (Mg): 0.5%.
Product Disclaimer: Use only as directed. Keep away from children. Store in cool, dark place.
Product Website: www.successnutrients.com

4. Success Flowers ™
Product Description: Success Flowers is formulated to compliment plants in both the vegetative and flowering phases. Use in conjunction with Success Trees and Success Micro for the best results. Success Flowers is very effective for both soil and hydroponic gardens.
Directions for Use: Use with every watering during both vegetative and flowering growth cycles. Mix well and adjust pH accordingly. Shake well before each use.
Guaranteed Analysis: Available Phosphate (P205): 5.0%, Soluble Potash (K20): 4.0%, Magnesium (Mg): 1.5%, Sulfur (S): 1.0%.
Product Disclaimer: Use only as directed. Keep away from children. Store in cool, dark place.
Product Website: www.successnutrients.com

5. Success Silica ™
Product Description: Success Silica is a beneficial supplement to be used in conjunction with Success Nutrients plant and food supplements. The strong plant tissue is generated from higher levels of Silicate that helps the plant flourish in adverse environmental conditions such as heat, drought, or frost. Silica is very effective in both soil and hydroponic gardens.
Directions for Use: Use with every other watering during the flowering phase. Mix well and adjust pH accordingly. Shake well before each use.
Guaranteed Analysis: Potash (K20): 0.5%, Silicon (Si): 2.0%.
Product Disclaimer: Use only as directed. Keep away from children. Store in cool, dark place.
Product Website: www.successnutrients.com

6. Success Flame ™
Product Description: Success Flame is formulated to enhance fruit, flower, and bud development throughout the flowering phase of a plant's life cycle. Use in conjunction with Success Nutrients plant food and supplements. Success Flame is very effective in both soil and hydroponic gardens.
Directions for Use: Use with every watering during weeks 3-8 of the flowering phase. Mix well and adjust pH accordingly. Shake well before each use.
Guaranteed Analysis: Available Phosphate (P2O5): 10.0%, Soluble Potash (K20): 6.0%, Magnesium (Mg): 0.5%
Product Disclaimer: Use only as directed. Keep away from children. Store in cool, dark place.
Product Website: www.successnutrients.com

7. Success Sugar ™
Product Description: Success Sugar is specially formulated to produce beneficial results for all phases of plant growth. Use in conjunction with Success Nutrients plant food and supplements. Success Sugar is very effective in both soil and hydroponic gardens.
Directions for Use: Use with every watering during weeks 3-8 of the flowering phase. Mix well and adjust pH accordingly. Shake well before each use.

Guaranteed Analysis: Sulfur (S): 2.0%, Magnesium (Mg): 1.5%
Product Disclaimer: Use only as directed. Keep away from children. Store in cool, dark place.
Product Website: www.successnutrients.com

8. Success Balance ™
Product Description: Success Balance is a highly fortified calcium, magnesium, and iron plant supplement designed to correct common deficiencies in both vegetative and flowering phases. Use in conjunction with Success Nutrients plant food and supplements. Success Balance is very effective in both soil and hydroponic gardens.
Directions for Use: Use with every watering during both vegetative and flowering phases. Mix well and adjust pH accordingly. Shake well before each use.
Guaranteed Analysis: Total Nitrogen (N): 2.0%, Calcium (Ca): 3.2%, Magnesium (Mg): 1.2%, Iron (Fe): 0.1%.
Product Disclaimer: Use only as directed. Keep away from children. Store in cool, dark place.
Product Website: www.successnutrients.com

9. Success Game Time ™
Product Description: Success Game Time is a concentrated plant food supplement formulated to increase flower size immensely while finishing the flowering phase. In addition, it is designed to enhance the production of essential oils and fragrance. Use in conjunction with Success Nutrients plant food and supplements. Success Game Time is very effective in both soil and hydroponic gardens.
Directions for Use: Use with every watering during weeks 6-8 of the flowering phase. Mix well and adjust pH accordingly. Shake well before each use.
Guaranteed Analysis: Sulfur (S): 2.0%, Magnesium (Mg): 1.5%
Product Disclaimer: Use only as directed. Keep away from children. Store in cool, dark place.
Product Website: www.successnutrients.com

10. SUPERthrive ®
Product Description: SUPERthrive is a highly concentrated non-toxic vitamin solution invigorating all variety of greenery for home gardeners and professionals alike. SUPERthrive maximizes potential by quickly building a strong root base and reducing transplant shock. SUPERthrive replenishes the soil to nourish and encourage the natural building blocks that plants make themselves under optimum conditions. It is equally suited for hydro-seeding, hydroponics, and foliar spraying.
Directions for Use: Apply to thirsty soil. Apply with or without fertilizers. Use mixed solution the same day, especially if adding fertilizer. Do not water plants for 24 hours after application. You may use a root injector to reach roots.
Guaranteed Analysis: Vitamin B1: .09%, 1-Naphthaleneacetic acid: .048%
Product Disclaimer: Use only as directed. Keep away from children. Store in cool, dark place.
Product Website: www.superthrive.com

11. Nutrilife SM-90
Product Description: Nutrilife SM-90 is a multi-purpose wetting agent that improves spray coverage in soil and on plants to increase the speed of moisture penetration in soils and growing

media. When added in small quantities to plant nutrient solutions, new root growth quickly emerges. Treated plants develop a larger and healthier root area resulting in improved overall plant health.
Directions for Use: Use 2 - 3 ml for each gallon of nutrient solution.
Guaranteed Analysis: Coriander Oil: 1.0%, Sulphonated Canola Oil: 94.0%, Triethanolamine: 5.0%
Product Website: www.nutrilifeproducts.com

12. Clonex ™
Product Description: A high performance rooting compound. Clonex Gel will remain in contact around the stem, sealing the cut tissue instantly and supplying the hormones needed to promote root cell development, and vitamins to protect the delicate new root tissue. May be used on both softwood and hardwood cuttings.
Directions for Use: Dip cutting to desired depth, insert into rooting medium, mist cuttings and place into propagator.
Guaranteed Analysis: Water, Hydroxyethylcellulose, Indole Butyric Acid, Mineral Salts and trace elements.
Product Website: http://www.growthtechnology.com/product/clonex/

13. MYKOS ® Pure Mycorrhizal Inoculant
Product Description: These beneficial fungi greatly increase the effective rooting area of plants thereby enhancing plant growth, vigor and tolerance of environmental extremes. Mycorrhizal fungi colonize roots and extend into the surrounding soil forming an essential link between plant and soil resources. They greatly increase the root's ability to absorb water and nutrients, while improving plant survival, vigor and health.
Directions for Use: Mykos **must** come into direct contact with roots. 30-45 mls (2-3 tbsp) of granules per pot; sprinkle granules directly onto the grow medium where the 4 x 4" Rockwell Cube will sit.
Guaranteed Analysis: Beneficial endo and ectomycorrhizal propagules, Soluble Kelp and a slow-release organic fertilizer.
Product Website: https://www.xtreme-gardening.com/mykos

Bask Ventures, Inc. will maintain records of the type and amounts of fertilizer and any growth additives used in the cultivation process. Records will be retained onsite with the Quality Assurance Manager according to Bask Ventures, Inc.'s Recordkeeping policies and procedures.

All feeding regimens may be adjusted to address the existing conditions of any plant or group of plants as determined necessary by the cultivation team's leadership and from time to time may include new feeding elements that may become or are allowable under California rules and regulations.

Integrated Pest Management (IPM)

Bask Ventures, Inc. is committed to the careful management of pesticide and fertilizer applications to prevent adverse events and enhance environmental health and safety. Bask Ventures, Inc.'s IPM protocols focus first on prevention, beginning with selecting pest- and disease-resistant strains of cannabis. The goal is to never need to utilize pesticides, miticides, fungicides or herbicides in the facility by employing proper scouting techniques, controlled environments, and clean-room technology. Bask Ventures, Inc. will attempt to manage external pest incursions by exercising preventive measures with employees and visitors coming into the facility. There are several factors that may, from time to time, require more intensive IPM protocols. IPM standard operating procedures (SOPs) do not provide a cookie cutter approach, but change depending on the circumstances and on what pest or pathogen Bask Ventures, Inc. is trying to control.

Bask Ventures, Inc. will rely on the expertise of their selected cultivation consultant, Medicine Man Technologies (MMT), for advice on how to prepare for, manage, and eliminate common pests and pathogens that may arise within the cultivation facility. MMT has actively operated a fully compliant medical and recreational marijuana cultivation facility in Denver, CO since 2007. Through years of cultivation experience, MMT has encountered and eliminated all the common afflictions that can be found in a cultivation setting through robust, tested IPM policies and procedures. Bask Ventures, Inc. will adopt proven methods and apply industry best practices with regard to pesticide application and integrated pest management, modified as necessary to meet the unique needs of our facility and to comply with the stringent California requirements referred to in §§ 8106, 8304, and 8307 of the California Code of Regulations, Title 3, Division 8.

Bask Ventures, Inc. will comply with all pesticide laws and regulations enforced by the California Department of Pesticide Regulation (DPR) and will adhere to the following DPR pesticide protocols [3 CCR § 8307]:

- Comply with all pesticide label directions;
- Store chemicals in a secure building or shed to prevent access by wildlife;
- Contain any chemical leaks and immediately clean up any spills;
- Apply the minimum amount of product necessary to control the target pest;
- Prevent offsite drift;
- Do not apply pesticides when pollinators are present;
- Do not allow drift to flowering plants attractive to pollinators;
- Do not spray directly to surface water or allow pesticide product to drift to surface water;
- Spray only when wind is blowing away from surface water bodies;
- Do not apply pesticides when they may reach surface water or groundwater; and
- Only use properly labeled pesticides. If no label is available consult the DPR.

Bask Ventures, Inc.'s cultivation plan will show all boundaries and dimensions in feet of the designated pesticide and other agricultural chemical storage areas. Bask Ventures, Inc.'s IPM plan will include the product name and active ingredients of all pesticides to be applied to cannabis during any stage of growth and integrated pest management protocols, including chemical, biological and cultural methods the Bask Ventures, Inc. anticipates using to control or prevent the introduction of pests on the cultivation site [3 CCR § 8106].

Any person performing pest control at Bask Ventures, Inc.'s facility will use only pest control equipment that is in good repair and is safe to operate. They will perform all pest control in a careful and effective manner using only methods and equipment suitable to insure proper pesticide application and will exercise reasonable precautions to avoid contamination of the environment, including persons, animals, and property [3 CCR §§ 6600, 6614].

County Agricultural Commissioner Reports

The size and diversity of California's agricultural environment necessitates a complex partnership between state and local pesticide regulatory authorities. DPR works closely with California's county agricultural commissioners, who serve as the primary enforcement agents for state pesticide laws and regulations. Before purchasing or using any pesticides at the cultivation facility Bask Ventures, Inc. will obtain an operator identification number and a site identification number from the County Agricultural Commissioner [3 CCR §§ 6622, 6623] ("Commissioner"). Every pesticide use, whether for plant or non-plant pests, will be documented on a Pesticide Application Log to include [3 CCR § 6624 (b)]:Date of application, including hour the treatment was completed;

- Application method (air, ground, other);
- Location of property treated;
    - The site identification number issued to the operator of the property treated;
    - Field location (outdoor cultivation) or building location (indoor cultivation), such as block/room/table.
    - Size of area treated.
- Pesticide product name;
- Pesticide EPA or DPR registration number on the pesticide label;
- Amount of product applied;
- Name of applicator; and
- Applicator certification/permit number (if applicable).

Bask Ventures, Inc.'s Cultivation Manager will be responsible for compiling Pesticide Application Logs and submitting monthly pesticide use reports to the Commissioner. Pesticide use reports will be on a (DPR) form or in a format approved by the director and will be submitted by the 10th day of the month following the month in which any pesticide work was performed; a copy of which will be retained by Bask Ventures, Inc. for a period no less than two years and will be made promptly available to the director or Commissioner upon request [3 CCR §§ 6624, 6626, 6627]. In addition to the information provided on individual pesticide application logs, monthly use reports will also include:

- The operator (Bask Ventures, Inc.) identification number issued to the operator of the property treated;
- Location of the property treated, by county, section, township, range, base and meridian;
- Total acreage (planted) or units treated at the site;
- Name of the operator (Bask Ventures, Inc.) of the property treated;
- Address of applicator; and
- Crop commodity, or site treated.

Pest Prevention

Cleaning and sanitation are a substantial part of Bask Ventures, Inc.'s cultural and chemical IPM protocols for prevention of both plant and non-plant pests [3 CCR § 8106(b)(2)(B)]. Many varieties of plant pests are attracted to waste and filth, especially plant matter. Bask Ventures, Inc.'s Sanitation Plan includes daily and weekly sanitation responsibilities for every position in the facility to ensure sanitary conditions that limit the potential for contaminants and pest outbreaks that may lead to contamination or adulteration of growing or harvested cannabis.

The next component of facility IPM protocols is limiting pest infestations inadvertently caused by humans. Bask Ventures, Inc. will provide employees and visitors with scrubs, and require every person entering the cultivation facility to change into these prior to entering limited access areas. Shallow alcohol filled foot-baths will be placed at the entrance to limited-access areas to rinse shoe bottoms before entering. This will help prevent pests such as spider mites, aphids, or other near-microscopic organisms from entering the garden by attaching onto a person's clothes. Employees will also be trained on measures to prevent cross-contamination, working in one room at a time, and not crossing between rooms unless necessary.

Cultivation room layout will be planned in relation to plant life cycle to facilitate efficient processes and avoid cross contamination; sufficient space will be included for the placement of equipment and storage of materials to maintain sanitary conditions for cannabis cultivation. Additionally, the design will allow the segregation of materials, products, and their components to minimize confusion and potential for errors. For example, crops will be segregated into several flowering rooms; personnel will be prevented from going room to room without first performing a uniform change and/or an alcohol spray down. In the event of a pest outbreak or contamination, segregated rooms will provide easier quarantine without disrupting the rest of the crop or spreading contaminants to other plants.

In the event that a pest or disease manages to make it through Bask Ventures, Inc.'s preventive measures, the cultivation team may need to apply a chemical solution to the affected plants or area. Bask Ventures, Inc.s will only use US Environmental Protection Agency (EPA) and DPR approved products and will require that these products only be applied by a "California Certified Private Applicator," or the EPA equivalent [3 CCR §§ 6580, 6582, and 6584].

Non-Plant Pests

Pests of any kind on the premises are unacceptable. They can spread disease, damage property, contaminate work surfaces, create adverse public opinion, and even lead to prosecution or closure of the facility. Bask Ventures, Inc.'s integrated pest management plan will include procedures to protect the facility against non-plant pest infestations using techniques that effectively identify and manage pest problems. Using chemical, biological, and physical (i.e., cultural) safeguards, Bask Ventures, Inc. will conduct preventative applications of pesticides, perimeter clean up, and the filling of holes and access points to control or prevent the introduction of pests on the cultivation site [3 CCR §8106 (a)(3)(B)].

Physical pest prevention methods include weekly exterior facility inspections, which will be conducted by the Maintenance Manager to identify potential habitats and food sources, gaps in doors or windows, inadequate screening, mowing, or other maintenance needed to prevent attracting rodents, insects and other pests. Staff will be trained on the importance of pest

prevention and to recognize the potential pests to safeguard against, such as rodents, cockroaches, flies, ants, and birds. Particular attention will be paid to incoming cannabis products and other consumable materials that may inadvertently introduce undetected pests.

Bask Ventures, Inc. will maintain concise and legible Pest Control Reports for non-plant pest management, (separate from cannabis-related IPM) including pesticide use records, that will be stored at the facility in an easily accessible binder and included in monthly reports sent to the Commissioner.

Cannabis Pesticide Overview

Prior to taking receipt, handling, storing, transporting, applying, or disposing of any approved pesticide at the cultivator facility, Bask Ventures, Inc. will establish SOPs and train its employees on handling, storing, transporting, applying, and disposing of pesticides in compliance with the environmental protection measures detailed in 3 CCR §§ 8304, 8305, 8306 and 8307.

To proactively enforce ongoing compliance with these requirements, Bask Ventures, Inc. will limit access to handling, storing, applying, transporting, and disposing of pesticides to the Cultivation Manager and Lead Cultivation Agents, who will be qualified as Certified Private Applicators, or the EPA equivalent [3 CCR §§ 6580, 6582, and 6584]. "Certified Private Applicator" means a private applicator holding a valid private applicator certificate issued by the Commissioner (or the Director in any county where there is no Commissioner).

Bask Ventures, Inc.'s Certified Private Applicators will comply with the requirements necessary to prevent unreasonable adverse effects to people, property, and the environment. In addition, no pesticide application will be made or continued if there is a reasonable possibility of contamination of nontarget public or private property, including the creation of a health hazard preventing normal use of a property [3 CCR § 6614]. To remain compliant with certification requirements, Bask Ventures, Inc. will require at least two full-time employees, specifically the Cultivation Manager and a Lead Cultivation Agent, to maintain their Private Applicator Certifications. These individuals will also work directly with the Quality Assurance Manager to facilitate DPR inspections and enforcement of this provision. At a minimum, Certified Private Applicators will demonstrate competency across the following topics:

- Labeling and label comprehension
- Health and safety
- Environmental protection
- Pests
- Pesticides
- Integrated pest management
- Equipment
- Application techniques and technology
- Laws and regulations

The cultivation staff will perform a full "flush" of pesticides in advance of the recommended flushing cutoff date. Flushing ensures all nutrients, pesticides, and fungicides are fully removed from the plant's system both internally and externally. This process will also ensure that any

residual chemicals are completely eliminated from the plants prior to harvest, providing them a clean bill of health when subjected to third party testing and verification.

Below is a representative summary of anticipated pesticides, fungicides, or herbicides to be utilized in the facility and determined benefits of the treatment. All products used in the treatment of pests, microbials and other pathogens will first be approved by the EPA or DPR.

Treatment: Soybean Oil
Sample Product: Greenclean®PRO
EPA Registration Number: 70299-15
Active Ingredients: 100% All Natural, active ingredients – soybean oil, hydrogen peroxide, peracetic acid, sodium percarbonate (i.e., sodium carbonate hydrogen peroxide)
Treatment: Kills spider mites and their eggs, predatory mites, aphids, whiteflies, broad mites and russet mites on contact. This all-natural, 100%concentrated product can be used as a solution for dipping tender new cuttings, to prevent garden contamination when outsourcing plant starts, and can be used as a treatment from the beginning through harvest. When used as a root drench be sure to inoculate afterwards to avoid affecting beneficial insects.

Treatment: Potassium Sorbate
Sample Product: Nuke Em®
EPA Registration Number: Exempt from EPA Registration under Section 25B of FIFRA
Active Ingredients: Potassium Sorbate, Water, Distilled Water, Deionized Water, Dry Yeast, Citric Acid
Treatment: This multi-purpose insecticide and fungicide kills the eggs, larvae, juvenile and adult insects that feeds on, and ultimately kill, plants. This targets all species of Spider Mites, Thrips, Whiteflies, Mealybugs and other plant insect parasites. The unique formula allows for outstanding control of vast varieties of powdery mildew and mold.

Treatment: Neem Oil
Sample Product: Trilogy®
EPA Registration Number: 70051-2
Active Ingredients: Neem Oil
Treatment: A botanical fungicide and miticide preventing a wide range of foliar diseases such as fungal attack of plant tissue and mite pressure on the plant.

Treatment: Lemongrass Oil
Sample Product: Kapow™
EPA Registration Number: Exempt from EPA Registration under Section 25B of FIFRA
Active Ingredients: Lemongrass Oil
Treatment: Combats fungus, mites and other insects by coating the bug's body and suffocating them, killing them on contact. Lemongrass Oil also has a natural pesticide that can also be transferred from bug to bug, killing them through ingestion. Lemongrass pesticide oil is safe for plants, people, and the environment.

Treatment: Azadirachtin
Sample Product: AzaMax™

EPA Registration Number: 71908-1-81268
Active Ingredients: Azadirachtin
Treatment: Organic, all-natural broad-spectrum insect control. Azadirachtin is a natural product that provides a broad spectrum of pest control, free of harsh chemical solvents and fully composed of food grade formulation ingredients. It controls pests by inhibiting them from feeding and by disrupting their growth. Effectively controls Spider Mites, Thrips, Fungus Gnats, Aphids, Whiteflies, Leaf Miners, Worms, Beetles, Leafhoppers, Scales, Mealy Bugs, Nematodes and other soil borne pests.

Treatment: Pyrethrins
Sample Product: Evergreen™
EPA Registration Number: 1021-2560
Active Ingredients: Pyrethrins
Treatment: Pyrethrins is a broad-spectrum insecticide that is Organic Materials Review Institute (OMRI) approved. Listed for use in both certified organic production and situations where a botanical insecticide fits the need. Delivers fast, effective control of insects including Ants, Cockroaches, and Stored Product Pests with a quick knockdown. Contains pyrethrum - a botanical insecticide derived from a chrysanthemum flower. Safe for food and non-food areas of food handling & processing facilities.

Treatment: Rosemary Oil
Sample Product: TetraCURB™
EPA Registration Number: Exempt from EPA Registration under Section 25B of FIFRA
Active Ingredients: Rosemary Oil
Treatment: Miticide. A proprietary blend containing rosemary essential oil for control and repellence of Spider Mites. Intended for the prevention and treatment of Spider Mites on all plants including food crops. Kemin Product Code #018134-20

Treatment: Diatomaceous Earth
Sample Product: Bonide Diatomaceous Earth Crawling Insect Killer™
EPA Registration Number: Exempt from EPA Registration under Section 25B of FIFRA
Active Ingredients: Diatomaceous Earth – A naturally occurring soft rock and fossilized remains (Including Silicon Dioxide and Amorphous Silica)
Treatment: Diatomaceous Earth is a very safe insecticide. It will kill Cockroaches, Silverfish, Millipedes, Earwigs, Bedbugs, Ants, Fleas, and other crawling insects. Listed insects die either by ingestion or contact. Made of sharp and tiny fossilized water plants that cut into the insects' bodies, causing dehydration. Insects that come in contact or ingest Diatomaceous Earth will die within two days. Bonide Product Code 7372914

Treatment: Potassium Salts
Sample Product: W. Neudorff Des-X Insecticidal Soap Concentrate™
EPA Registration Number: 67702-22
Active Ingredients: Potassium Salts and Fatty Acids
Treatment: Used to treat plants prior to biological control agent release and to treat "hot spots" for pest control in greenhouses with subsequent release of beneficial mites and insects. Compatible with biological control agents, beneficial insects, and mites. Potassium Salts are a

contact killer for both insect and mite pests, penetrating the body of pests resulting in rapid death. Potassium salts kill pests by disrupting membrane and cellular function. Potassium salts contain specially selected fatty acid salts (soaps) chosen for effective pest control. Potassium Salts are effective against the adult, larval, and nymphalid stages of pests. Pupal stages of some pests (e.g. whitefly) may also be affected.

Treatment: Citric Acid
Sample Product: Procidic™
EPA Registration Number: Exempt from EPA Registration under Section 25B of FIFRA
Active Ingredients: Citric Acid
Treatment: An agricultural bactericide and fungicide compound formulated to protect crops during all stages of growth. Prevents and controls a variety of diseases including Powdery Mildew, Bud Rot, and Root Rot both on contact and systematically. Rapidly absorbed all-natural bactericide and fungicide. Registered Material for Use in Organic Agriculture.

Treatment: Potassium Bicarbonate and Cinnamon, Rosemary, Thyme Oil
Sample Product: Zero Tolerance™ Herbal Pesticide
EPA Registration Number: Exempt from EPA Registration under Section 25B of FIFRA
Active Ingredients: Potassium Bicarbonate and essential oils of Cinnamon, Rosemary, Thyme, Clove, Wintergreen, Oregano.
Treatment: A natural and safe garden solution. Eliminates plant pests. This herbal pesticide is made from the highest quality oils of cinnamon, clove, rosemary and thyme. Zero Tolerance not only stops pests in their tracks, it smells great too. It's made from pure food grade ingredients and is plant, people and pet friendly.

Treatment: Pyrethrins
Sample Product: Botanigard MAXX™
EPA Registration Number: 82074-5
Active Ingredients: Pyrethrins and Beauveria bassiana strain GHA.
Treatment: Controls whiteflies, aphids, thrips, spider mites, weevils and more.

Storage, Transportation and Disposal of Pesticides
Bask Ventures, Inc. will not store, handle, empty, dispose of, or leave unattended in such a manner or at any place where they may present a hazard to persons, animals (including bees), food, feed, crops or property any pesticides, emptied containers or parts thereof, or equipment that holds or has held a pesticide. The Commissioner may take possession of such unattended pesticides or emptied containers to abate such hazard [3 CCR § 6670].

Bask Ventures, Inc. will not deliver a container that holds, or has held, a pesticide unless it is stored in an enclosure or closure as required by law. Pesticide containers will be stored in a locked enclosure, or, in the case of liquid pesticides, in a container larger than 55 gallons in capacity, which has a locked closure. The Cultivation Manager or Lead Cultivation Agent, acting in their capacity as a Certified Private Applicator, will be responsible for maintaining control over pesticide containers at all times [3 CCR § 6672].

Signs visible from any direction of probable approach will be posted around all storage areas where containers that hold, or have held, pesticides required to be labeled with the signal words "warning" or "danger" are stored. Each sign will be readable at a minimum distance of 25 feet in both English and Spanish and will read as follows [3 CCR § 6674]:

DANGER! POISON STORAGE AREA ALL UNAUTHORIZED PERSONS KEEP OUT KEEP DOOR LOCKED WHEN NOT IN USE	PELIGRO! ÁREA DE ALMACENAMIENTO DE VENENO TODAS LAS PERSONAS NO AUTORIZADAS SIGAN FUERA MANTENGA LA PUERTA BLOQUEADA CUANDO NO ESTÉ EN USO

In no case will any pesticide be placed or kept in any container of a type commonly used for food, drink or household products [3 CCR § 6680]. Except for those product containers that are meant to be returned to the manufacturer, every emptied container that has held less than 28 gallons of a liquid pesticide diluted for use will be rinsed and drained at the time of use as follows:

1. Use the following amount of water or other designated spray carrier for each rinse based on size of container:
    a. Less than 5 gallons = 1/4 container volume of rinse medium
    b. 5 gallons or over = 1/5 container volume of rise medium
2. Place required minimum amount of rinse medium in the container, replace closure securely, and agitate.
3. Drain rinse solution from container into tank mix. Allow container to drain 30 seconds after normal emptying.
4. Repeat (2) and (3) above a minimum of two times to provide a total of three rinses.

Alternative Methods:

- Invert the emptied container over a nozzle located in the opening of the mix tank which is capable of rinsing all inner surfaces of the container.
- Activate the rinse nozzle allowing the rinse solution to drain into the tank. The rinse will continue until the rinse solution appears clear and a minimum of one-half of the container volume of rinse medium has been used. A minimum of 15 pounds pressure per square inch will be used for rinsing.

Other rinse methods, at least equal in effectiveness to the above may be adopted provided they are approved by the director [3 CCR § 6684].

Pesticide Worker Safety

The work practices and safety requirements described here are designed to reduce risk of exposure, ensure availability of medical services for employees who handle pesticides, and to provide safe working conditions for employees.

Before employees are allowed to handle pesticides, they will refer to the *Hazard Communication Information for Employees Handling Pesticides in Agricultural Settings* (Pesticide Safety Information Series Leaflet A-8) or *Hazard Communication Information for Employees Handling*

Pesticides in Noncrop Settings (Pesticide Safety Information Series Leaflet N-8). If requested, the Cultivation Manager or Lead Cultivation Agent will read to the requesting employee, in a language understandable to that employee, Pesticide Information Series Leaflet A-8/N-8.

Bask Ventures, Inc. will maintain the following in a central location accessible to all employees who handle pesticides [3 CCR § 6723]:

- Pesticide use records as specified in § 6624 (b), (c), and (e) for pesticides that have been handled by employees;
- Copies of available Pesticide Safety Information Series Leaflets which are applicable to the pesticides and handling activities listed in the pesticide use records.
- The A-8 leaflets will also be posted at all permanent decontamination stations (if servicing 11 or more handlers).
- Any changes to the A-8 relating to the name, address, or telephone number of the facility providing emergency medical care must be updated within 24 hours of the change.
- Safety Data Sheets (SDS), as specified by 8 CCR § 5194, for each pesticide listed in the pesticide use records. If the SDS is not provided by the registrant of a pesticide, Bask Ventures, Inc. will:
    - Within seven working days of a request for a SDS from an employee, employee representative or employee's physician, make a written inquiry to the registrant of the pesticide, asking that a SDS be sent to the Bask Ventures, Inc..
    - A copy of the written inquiry will immediately be sent to the person requesting the SDS.
    - Bask Ventures, Inc. will notify the requester of the availability of the SDS or provide a copy of the SDS to the requester within 15 days of receipt of the SDS from the registrant.

If a response has not been received from the registrant within 25 working days of the date the inquiry was made, Bask Ventures, Inc. will send the Department a copy of the inquiry with a notation that no response has been received. Bask Ventures, Inc. will obtain and provide the SDS utilizing other more expedient methods in lieu of those provided by the Department [3 CCR § 6723].

Bask Ventures, Inc. will inform its employees, before they are allowed to handle pesticides and at least annually thereafter, of the location and availability of the records and other documents relating to pesticide employee training, monitoring, and potential exposure. If the location of the records and other documents changes, Bask Ventures, Inc. will promptly inform employees of the new location [3 CCR 8 § 6723].

Application-Specific Information for Handlers

Bask Ventures, Inc. will display, at a central location, the following application-specific information while employees are employed to handle pesticides [3 CCR § 6723.1]:

- The crop or site treated and identification of the treated area;
- The date(s) and time(s) the application started and ended;
- Restricted entry interval;
- Product name, U.S. EPA registration number, and active ingredients; and
- A copy of the Safety Data Sheet(s) for the applied pesticide(s).

Employees mixing, loading, or applying pesticides will not work alone no matter the time of day or night unless they are equipped with a personal radio or telephone and contact is made with them at least every two hours during daylight hours (or every hour at night) [3 CCR § 6730].

Bask Ventures, Inc. will ensure that there is an area where employees can change clothes and wash themselves at the place where they end their exposure period and remove their personal protective equipment (PPE). Bask Ventures, Inc. will provide a clean, pesticide-free place where employees can store their personal clothing and belongings while at work handling pesticides [3 CCR 8 § 6732]. Further, Bask Ventures, Inc. will ensure that sufficient water, soap, and single use towels for routine washing of hands and face and for emergency eye flushing and washing of the entire body (i.e., decontamination) are available for employees [3 CCR § 6734]. At least one system capable of delivering gently running water at a rate of least 0.4 gallons per minute for at least 15 minutes, or at least six gallons of water in containers suitable for providing a gentle eye-flush for about 15 minutes for emergency eye-flushing will be located at the mixing/loading site in the cultivation facility [3 CCR § 6734 (b) (C) (6)].

Personal Protective Equipment Care and Safety

Bask Ventures, Inc. will provide all PPE required by pesticide product labeling, regulation, and restricted material permit condition (if applicable), provide for its daily inspection and cleaning (according to pesticide labeling instructions or, absent any instructions, washed in detergent and hot water), and repair or replace any worn, damaged, or heavily contaminated PPE. Bask Ventures, Inc. will ensure that all clean PPE, when not in use, is kept separate from personal clothing and in a clean and pesticide-free, specifically designated place, and that [3 CCR §§ 6738, 6738.1, 6738.2, 6738.3]:

- PPE is used correctly for its intended purpose;
- Potentially contaminated PPE is washed separately from other clothing or laundry;
- All clean PPE is either dried thoroughly before being stored or is put in a well-ventilated place to dry;
- PPE remains the property of the employer and that pesticide handlers are not allowed or directed to take potentially contaminated PPE into their homes; and
- Any person or firm assigned or hired to clean or repair potentially contaminated PPE is protected and informed in accordance with the requirements of section 6744, regarding equipment maintenance.

While Bask Ventures, Inc. recommends its employees use and will provide an approved respirator when applying any pesticide treatments, currently, Bask Ventures, Inc. does not utilize any substances that require the use of a respirator. If Bask Ventures, Inc. adds a substance to its regimen that requires the use of a respirator by label, restricted material permit condition, or regulation Bask Ventures, Inc. will follow the guidelines laid out for providing employees with approved respiratory equipment, base-line and annual medical evaluations, proper fitting/fit testing, and training [3 CCR § 6739]. Pursuant to § 6739 (b) and (r), Bask Ventures, Inc. will provide the following verbatim information for employees using respirators when not required by label or restricted material permit conditions or regulation:

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use, even when exposures are below the exposure limit, may provide an additional level of comfort and perceived protection for workers. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards or Department of Pesticide Regulation guidelines. If your employer provides respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.

You should do the following:
1. Read and follow all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirators limitations.
2. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
3. Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.
4. Keep track of your respirator so that you do not mistakenly use someone else's respirator.
5. Air filtering respirators DO NOT supply oxygen. Do not use in situations where the oxygen levels are questionable or unknown.

Whenever natural light in a mixing/loading area is not adequate to allow an employee to read a product label and work in a safe manner, Bask Ventures, Inc. will be sure to provide artificial light sufficient to comfortably perform these activities [3 CCR § 6740].

Bask Ventures, Inc. will assure that equipment used for mixing, loading, transferring, or applying pesticides is inspected before each day of use and that equipment with any safety defect is repaired or altered to remove the hazard before it is further used. All openings on tanks used for mixing or applying pesticides will be equipped with covers to prevent splashes and spills. Each tank, with a capacity of more than 49 gallons, that is used to mix or apply any liquid mixture derived from a pesticide will have either a properly functioning means to indicate externally the internal liquid level in the tank such as a sight gauge; or the tank or the filler hose nozzle will have a device to automatically stop the filling operation before the pesticide liquid mixture can spill over the top. Additionally, all external sight gauges will be protected against breakage and equipped with valves so the pipes or tubes connected to the sight gauge can be shut off if needed [3 CCR § 6742].

Bask Ventures, Inc. will inform each employee under their control who may be involved in the cleaning, servicing or repair of equipment used for mixing, loading, transferring, or applying pesticides of the hazards of the pesticides that they may encounter, and the methods of protecting themselves against personal injury [3 CCR § 6744].

When cleaning, servicing or repairing is to be performed by persons not under Bask Ventures, Inc.'s control they will notify the person in charge of performing these services of the hazards of the pesticides that they may encounter, and the methods of protecting themselves against personal injury. Bask Ventures, Inc. will also notify the person in charge of performing these services of the following [3 CCR § 6744]:

- Pesticide application equipment may be contaminated with pesticides.
- Procedures for handling pesticide application equipment and for limiting exposure to pesticide residues.
- Personal hygiene practices and decontamination procedures for preventing pesticide exposures and removing pesticide residues.

Odor Management Plan

Each municipality in California may have its own ordinances and regulations relating to odor control and mitigation. As part of Bask Ventures, Inc.'s commitment to positive community impact, Bask Ventures, Inc. has developed odor mitigation strategies to minimize cannabis smells being emitted by the cultivation facility. Bask Ventures, Inc. has considered potential impacts to people, animals, and neighboring properties during site selection, facility design, and development of standard operating procedures (SOPs). Both primary and secondary systems will be installed within the cultivation to reduce detectable odors outside the facility.

Reducing Known Odor Sources

Propagation - During the propagation stage, young plants are created from cuttings or "clones" of existing plants in the company's inventory. Very little odor will be emitted in this stage, primarily during the cutting process. All activities will be conducted with the entrance to this room closed to minimize odors escaping into the adjacent hallway. All tables and surfaces that come in direct contact with cannabis will be cleaned and disinfected immediately after use to prevent build-up of residue and potential odors. All non-contact surfaces in this room will be cleaned and disinfected on a weekly basis. Due to the minimal odor emissions at this stage, the propagation room will rely on a commercial PHI unit (see specs below) that will be installed in the primary HVAC to mitigate any odors that enter the ventilation system.

Vegetative - During the vegetative growth phase, plants are transplanted from 2-inch clone trays holding 5-inch cups to 3-gallon planters and receive 18 hours of light per day. During vegetative growth, very little odor is emitted. All activities will be conducted with the entrance to this room closed to minimize odors escaping into the adjacent hallway. All tables and surfaces that come in direct contact with cannabis will be cleaned and disinfected immediately after use to prevent build-up of residue and potential odors. All non-contact surfaces in this room will be cleaned and disinfected on a weekly basis. Due to the minimal odor emissions at this stage, the vegetative room will rely on the PHI unit installed in the primary HVAC to mitigate any odors that enter the ventilation system.

Flowering - In these rooms, plants receive 12 hours of light and 12 hours of darkness to induce flowering. The plants will initially generate minimal odor, but this will become more pronounced as the plants approach maturity. All activities will take place with the entrance to the room closed to prevent odors from entering the adjacent hallway. Each flowering room will also feature a filter affixed to the inlet of its HVAC system that uses activated charcoal to absorb most odors. While carbon filters have been shown to be one of the most effective methods of reducing odors, they do not remove 100% of the pollutants that pass through them; the PHI unit installed in the primary HVAC system will remove most remaining odors that aren't absorbed by the activated carbon filters, rendering the exhausted air free of any detectable odor.

Harvest - In these rooms, live plants are harvested and broken down into categories for packaging. During harvest, the most significant odor is emitted due to handling and agitating the plants. All activities will take place with the entrance to the room closed, to prevent odors from entering the adjacent hallway. Each harvest room will also feature a filter affixed to the inlet of its HVAC system that uses activated charcoal to absorb most of the odors. The PHI unit installed

in the primary HVAC system will remove most remaining odors that aren't absorbed by the activated carbon filters, rendering the exhausted air free of any detectable odor.

Cure - Within the cure room, harvested flowers and trimmings are dried on exposed racks for a period of 2-5 days and then placed into sealed curing tubs for another 10-20 days. The cure room is an isolated, secure and contaminant free room specifically designed and equipped to maintain constant temperature, humidity and air circulation. Moderate odor can result from the cure process, and Bask Ventures, Inc. will rely on the PHI unit installed in the primary HVAC system to remove any odors.

Packaging - Within the packaging station, dried flower is separated according to bud size and placed into either bulk or retail packaging. Mild odor is emitted during the packaging process, as the cured cannabis is agitated during packaging. This also results in a small amount of particulate matter being released, which can contribute to the odors emitted. The packaging room will be equipped with an activated carbon filter, similar to those used in the other more odor-intensive rooms. The activated carbon filter will absorb a large portion of the odors emitted during packaging, and features a pre-filter designed to collect particulate matter.

Storage – Odors should be minimal in designated storage areas but may be elevated at times due to potentially open product containers being held in the designated quarantine area. Employees will be trained to place open containers of quarantined products into resealable plastic (Ziploc) bags, and immediately close all containers in the storage area to minimize odor. The storage room will also be equipped with an activated carbon filter.

Odor Mitigation Devices
Bask Ventures, Inc. will install a commercial Photohydroionization (PHI) Unit as the primary odor mitigation device, designed to eliminate 99.99% of all odors safely and efficiently. In rooms where the odor is more intense, Bask Ventures, Inc. has elected to use activated carbon filters as a secondary odor reduction method.

Commercial PHI Unit by RGF®
This device is designed to reduce air pollutants that cause odors such as volatile organic compounds (VOCs) or smoke, and kills mold, bacteria, and viruses. The unit is easily mounted into air conditioning and heating system air ducts, which are the primary conduits for odors being released outside the facility. When the HVAC system is in operation the Commercial PHI Unit creates an advanced oxidation process consisting of hydro-peroxides, ozonide ions, super oxide ions and hydroxide ions. All are considered "low-r oxidizers" that revert to oxygen and hydrogen during the oxidation of a pollutant. The system comes fully assembled for easy installation.

Germicidal UV light rays have been used for decades by the medical industry as a method for destroying micro-organisms (germs, viruses, bacteria). UV light is dependable and can be easily installed in HVAC ducts or a plenum. Germicidal UV light is effective in reducing the airborne micro-organisms that pass directly through its rays. However, germicidal UV light has little to no effect on gases, vapors or odors. PHI Advanced Oxidation, on the other hand, is very effective on gases, vapors, VOCs and odors.

The combination of safe, low-level ozone and UV light enhanced by a hydrated quad-metallic compound target develops an advanced oxidation reaction that reduces ozone to safe levels. This process also produces hydro-peroxides, super oxide ions, ozonide ions and hydroxides. By engineering the proper UV light wavelength, in combination with a triple function, no maintenance unit, the PHI Cell provides safe hydro-peroxides, super oxide ions, ozonide ions and hydroxides to purify the air.

Activated Carbon Filters
Secondary odor mitigation will include the placement of high-quality, 2.5" activated carbon filters in the HVAC systems. These filters will be affixed to the HVAC intake vents in all rooms where cannabis is grown, harvested, dried, packaged, stored, displayed for sale, or otherwise handled.

These filters act by "scrubbing" the air, absorbing contaminants into the activated carbon material as it passes through to be recirculated throughout the HVAC system. Bask Ventures, Inc. has selected Can Filter for the provider of these filters. The products are made in North America and Can Filter has a reputation for supplying high-quality filters for over 30 years. The brand was selected for having the thickest filter material and longest shelf life of the various filters Bask Ventures, Inc. compared.

Service and Maintenance
Employees will be instructed on the routine maintenance of pre-filters and carbon filters during orientation and training. Employees will learn how to disassemble pre-filters and carbon filters for inspection and proper maintenance, along with proper removal and reinstallation.

Pre-filter - Employees will perform maintenance on pre-filters monthly by vacuuming the dust from the pre-filter. Pre-filters will be replaced every six months.

Carbon filter - Employees will perform maintenance on carbon filters as needed by vacuuming the dust from the outside of the carbon filter. Carbon filters will be replaced every four years.

PHI unit – Employees will routinely check the bulb during monthly inspections with a sight glass to confirm the unit is operational. Per manufacturer's instructions, the bulbs will be replaced every 18,000 hours, or around every 4 years at an average of 12 hours per day of operation.

All filters and pre-filters will be tagged to identify the employee that installed the device, the date and time of the replacement, and the date by which the device should be replaced. Service and maintenance records will be maintained for all serviceable items in the odor control system. These records will contain:

- Date and time of service,
- Service performed,
- Name of individual performing the service, and
- Unit number or device number serviced.

Odor Complaints and Troubleshooting

Bask Ventures, Inc. has developed SOPs to manage complaints or system malfunctions should they arise. As part of routine facility inspections, Bask Ventures, Inc.'s Quality Assurance Manager (QAM) will walk around the perimeter of the facility to confirm there are no detectable odors being emitted. Should any odor be detected, the QAM will record the issue in their inspection notes including the location the odor was detected.

If Bask Ventures, Inc. receives a complaint of odors being emitted from the facility, the QAM will complete a complaint form to document the incident and begin the investigation and resolution process. Once the form has been completed, it will be immediately provided to the GM and Maintenance Manager. The complaint form will include:

- Date and time of complaint,
- Name of the individual making the complaint,
- Description of the complaint, and
- Name and badge number of the employee recording the complaint.

Once an odor mitigation concern has been identified, the Maintenance Manager will follow a diagnostic process to pinpoint the possible source of the odors, complete mitigation procedures such as repair or replacement of equipment as needed and confirm the repair has resolved the issue.

Inventory Control

Bask Ventures, Inc. has created inventory control standard operating procedures (SOPs) including the management of the California Cannabis CCTT (CCTT) system, security and anti-diversion policies and protocols for monitoring and tracking inventory, inventory maintenance, cannabis waste management, and reporting procedures in accordance with all CalCannabis and Bureau of Cannabis Control ("the State") applicable laws, rules, and regulations. Bask Ventures, Inc. will utilize the CCTT system, a point-of-sale (POS) system, and manual logs to establish and maintain robust inventory controls that ensure all cannabis is accounted for at all times.

The primary method of inventory tracking will be through the CCTT system, which will provide a complete account of cannabis in the facility from the time start-up inventory is purchased, through each stage of the plant's lifecycle, to packaging and final sale or disposal of finished product. Once deployed, the system is critical to ensuring a complete and transparent account of all plants and finished packages on-hand at the cultivation facility at any given time. Every cultivation action at the facility, such as a sale, movement, or adjustment of inventory, will be serialized and recoverable on-demand as required by the State or law enforcement agencies. Strict inventory management will allow Bask Ventures, Inc. to lower costs, speed up fulfillment, and prevent fraud, abuse, or unlawful diversion.

Prior to beginning operations at the cultivation facility, Bask Ventures, Inc. will deploy METRC, the state selected CCTT system, to track plant and product movement to, from, and within the facility, account for funds received by Bask Ventures, Inc. for the sale of cannabis, track and monitor the disposal of cannabis waste, and use in the event of a recall of defective cannabis. Bask Ventures, Inc. will track and submit into the CCTT system any information the State determines necessary for regulating and tracking cannabis, as well as any data Bask Ventures, Inc. determines necessary for increasing operating efficiency, diversion prevention, and quality assurance based on data-driven decisions.

Bask Ventures, Inc. will have a dedicated Inventory Control Manager (ICM) to manage and coordinate efforts for tracking and compliance. The ICM will also coordinate system training to ensure personnel are up to date, compliant, and using the software correctly. The ICM is designated in Bask Ventures, Inc.'s organization to legally represent Bask Ventures, Inc. as Bask Ventures, Inc.'s CCTT account manager [3 CCR § 8402 (b)]. The CCTT account manager will complete METRC system training. This individual will work closely with the Quality Assurance Manager (QAM) on updates or changes to the system as required. The ICM will stay current on new or updated inventory regulations as they roll out and will ensure that personnel are likewise kept informed. The ICM will periodically test the system and document and report any issues that might arise to management, and if necessary, to the State. Documentation of processes completed by staff on paper logs are verified and entered into the CCTT system by the ICM.

The CCTT system will interface with the point-of-sales (POS) system to further ensure efficient and accurate inventory control. Sales to other cannabis facilities are tracked through this system and can be accessed only by authorized personnel. The transaction history for each shipment includes the date of purchase, product name and quantity, sale price, discounts, and more. A wide range of inventory and sales reports can be made available to the State upon request.

CCTT System Implementation

Bask Ventures, Inc. will pay the utmost attention to the proper implementation, management, and maintenance of inventory controls to mitigate the risk of hardware or software failure that might jeopardize the company's operational status. The first step of implementing an inventory control process will be the execution of a contract with Franwell, Inc., the CCTT system provider prescribed by the State. Once a contract is finalized, Bask Ventures, Inc. and Franwell will arrange for training, access and installation of the CCTT system. Upon successful installation of the CCTT system, a representative of the provider will offer educational materials and provide hands-on training for the proper setup, implementation, and management of the system. As part of a contractual agreement, Bask Ventures, Inc. will require the system provider to have an established support channel via phone and/or email to assist Bask Ventures, Inc. employees as needed to ensure continuous operation of the hardware and software.

Upon installation, the QAM will work with the ICM to create and implement CCTT SOPs to govern the process by which employees maintain inventory. The inventory control SOPs will be made available to every employee who has input to the chain of custody of cannabis within the facility before commencing work, to ensure there is a complete understanding of the process and their associated accountability. Employees will be required to acknowledge by signature their understanding and adherence to the SOPs. A copy of this documentation will be retained in their employee file.

Only employees and contractors who are required to manage, maintain, or provide input into the CCTT system will be granted access on behalf of Bask Ventures, Inc.. Accordingly, the only individuals able to grant or rescind employee or operator access will be the General Manager (GM) and ICM, ensuring full accountability and traceability regarding system access control.

Cultivation Inventory Control Overview

The CCTT system will provide real-time tracking and accountability for all plants in the facility from seeds or clones, through each stage of the plant life cycle, to post-harvest preparation including trimming, drying, curing, batching, and packaging. Accountability within the system will include transaction level data that records every employee interaction with plants and packaged products. This includes plant movement within the facility, nutrient feeding, pesticide applications, cultivation notes, and testing results. Every action will appear on the plant history detail record with the associated time/date, user credentials, actions performed, and the status change details.

Bask Ventures, Inc. has utilized the experience of their selected cultivation consultant, Medicine Man Technologies, to identify critical input points into the CCTT system throughout the entire cultivation process, ensuring best practices are applied to accurately track cannabis inventory within the facility. Data entry access will be restricted to a limited number of employees to keep the information properly managed and limit the opportunity for unlawful diversion through manipulation of data or the software. The ICM will coordinate with the Cultivation Manager and GM to ensure individuals with approved access to the CCTT system are properly managing critical input points.

Some of the identified critical input points in METRC are:

- Input of startup inventory, including seeds or immature cannabis plants.
- Propagating immature cannabis plants from cuttings, clipping, or seedlings.
- Transitioning immature cannabis plants into a vegetative phase.
- Transitioning vegetative phase cannabis plants into a flowering phase.
- Harvesting cannabis plants upon completion of the flowering phase.
- Changing the physical location of immature cannabis plants and cannabis plants within the facility.
- Tracking cannabis plant weights upon harvest and trim, including; total plant wet weight, flower/bud weight, trim weight, waste weight.
- Transitioning cannabis to a drying and curing phase.
- Tracking cannabis dry weight.
- Tracking cannabis that is in an active testing phase.
- Tracking finished cannabis in batch or lot form.

Bask Ventures, Inc. will enter all transactions, current inventory, and other information required by the State in the CCTT in compliance with all applicable rules and regulations [3 CCR § 8402]. The following events will be logged in the system:

- The sale or transfer of cannabis to or from another cannabis facility,
- The transport of cannabis to or from another cannabis facility, and
- Disposal of cannabis.

The ICM acting as the CCTT account manager (or an assigned system user) will report in the system any change in the disposition of cannabis plants on the licensed premises. Any changes in plant disposition within the facility will be made within three business days of the change. Changes in disposition of cannabis plants include [3 CCR § 8405 (c)]:

- Flowering;
- Destruction or disposal;
- Harvest;
- Processing;
- Storage; and
- Packaging.

Each of these transactions will include:

- Date of transaction or event,
- Employee identification number responsible for data entry,
- Identification number of receiving cannabis facility,
- Batch identification number, and
- Plant identification number, if applicable.

The following inventory items will be maintained in the CCTT system and tagged with a unique identification number assigned for each:

- The number, weight and type of seeds (or clones);
- The number of immature cannabis plants;
- The number of cannabis plants;
- The number of cannabis products ready for sale;

- The number of damaged, defective, expired or contaminated seeds, immature cannabis plants, cannabis plants and cannabis products awaiting disposal; and
- Records of any theft, loss, or other unaccountability of any cannabis.

Inventory Storage

Bask Ventures, Inc. has developed comprehensive SOPs that will dictate how cannabis plants and products are stored at the facility; please see Storage Plan for Bask Ventures, Inc.'s storage policies and procedures. Pursuant to 3 CCR § 8207 (h)(1), all cannabis will be located in secure, limited access storage areas that meet all applicable security requirements.

These storage rooms will subject to Bask Ventures, Inc.'s two-person rule, requiring dual access to enter. As such, no one person will enter or be left alone in these rooms for any reason. Access to the secure storage areas will be limited to select authorized employees of Bask Ventures, Inc., with the electronic access locks keyed only to those individuals and a current roster maintained onsite. The following additional security precautions will be followed at all times:

- All plant and package movements will be recorded within the CCTT system.
- Rooms are to remain secure when not in use or otherwise occupied.
- Company-issued uniforms must be worn by employees at all times.

Packaged, harvested cannabis will be further segregated within limited access areas and stored in a dedicated safe, storage refrigerator, or vault, utilizing the maximum amount of security possible in the facility. Following Federal Drug Enforcement Agency guidelines for the storage of a controlled Schedule I substance [DEA CFR §1301.72], any storage safe on the premises will be commercial-grade, made of steel, and will be large enough to store the cannabis items anticipated to be on the premises at any given time. The safe will be bolted or cemented to a permanent structure if weighing less than 750 pounds. Larger quantities of product will be stored in a vault, defined as an enclosed area, or room, that is constructed of steel-reinforced or block concrete and has a door that contains a relocking device or equivalent, and a steel plate with a thickness of at least one-half inch. Vaults will be installed away from exterior walls and constructed of steel-reinforced concrete, armored walling, or other building material designed to prevent infiltration or other unauthorized access by burglary or theft. In addition, the vault upon attempted unauthorized entry will transmit a signal directly to a central protection company and local and state police agencies that have a legal duty to respond or a 24-hour control station operated by the Bask Ventures, Inc.'s Security Vendor [DEA CFR §1301.72 (a)(1)(III)]. The model, type, and weight of any safe or storage refrigerator will be documented in Bask Ventures, Inc.'s administrative records and security SOPs upon purchase.

Plant Inventory

Except as provided in 3 CCR § 8407, Bask Ventures, Inc. will enter all cannabis into the CCTT system starting with seed, cannabis that has been propagated onsite, or purchased from a licensed nursery, or seedling purchased from a licensed nursery [3 CCR § 8403 (a)(4)]. Start-up inventory will be recorded in the CCTT system by the ICM within 48 hours of receipt. Bask Ventures, Inc. will initiate inventory using a combination of seeds and clones, depending on which method will provide the highest quality genetics available for the targeted strains in Bask Ventures, Inc.'s formulary. A record of purchased seeds will include the number, weight, and type. Once start-up inventory purchasing has ceased, Bask Ventures, Inc. will propagate cuttings from existing plant

stock within the inventory system. All subsequent cannabis plant inventory (seeds, immature plants, etc.) will be sourced only from licensed cultivators.

Whether purchased from an external source or propagated from existing plant stock, as soon as each inventory item is entered into the system, it is assigned a globally unique, non-repeating inventory ID ("UID"); an alphanumeric code or designation used for reference to a specific plant on the licensed premises and any cannabis or cannabis product derived or manufactured from that plant [3 CCR § 8403]. This UID will remain assigned to the plant until harvest, automatically associating any input within the system regarding plant interaction and movement to that unique barcode. Using the CCTT system, scanning the UID barcode allows a user to immediately create notes, update plant information, and view historical details including (but not limited to) plant movement history, nutrient and growth additive details and schedules, and pesticide application details.

Within five (5) business days of the date Bask Ventures, Inc.'s designated account manager(s) was credentialed to use the CCTT system, Bask Ventures, Inc. will request UIDs using the CCTT system as prescribed by the State.

Bask Ventures, Inc. will only use UIDs provisioned and distributed by the State, or the State's designee, and will maintain a sufficient supply of UIDs in inventory to support tagging in accordance with 3 CCR § 8403. Bask Ventures, Inc. will use the CCTT system to document receipt of provisioned and distributed UIDs within three (3) business days of physical receipt of the UIDs by Bask Ventures, Inc..

As prescribed in the California Code of Regulations, a UID will accompany cannabis products through all phases of the growing cycle, as follows [3 CCR § 8403 (b)]:

- Bask Ventures, Inc. will assign a UID to each established lot of immature plants. The lot UID will be placed in a position that is visible and within clear view of any individual standing next to the immature lot to which the UID was assigned. Bask Ventures, Inc. will keep all UIDs free from dirt and debris. No lot of immature plants will contain more than one-hundred (100) immature plants at any one time. All immature plants in a lot will be labelled with the corresponding UID number assigned to the lot and will be arranged contiguously to one another in order to facilitate identification during inspection by the State.
- Bask Ventures, Inc. will apply a UID to all individual plants at the time any plant is moved to the designated canopy area or when an individual plant begins flowering [3 CCR § 8000(l)].
- Bask Ventures, Inc. will ensure a UID is affixed to each mature plant. UIDS will be attached to the main stem, at the base of each plant. The UID will be attached to the plant using a tamper evident strap or zip tie and will be placed in a position to be visible and within clear view of any individual standing next to the mature plant to which the UID was assigned. UIDs will be kept free from dirt and debris. Bask Ventures, Inc. will not remove the UID from any mature plant to which it is attached and assigned until the plant is harvested, destroyed or properly disposed.

- Bask Ventures, Inc. will assign each harvest batch a unique harvest batch name that will be associated with all UIDs for each individual plant, or portion thereof, contained in the harvest batch.
- UIDs are required for all cannabis and nonmanufactured cannabis products and will be associated with the corresponding harvest batch name from which the cannabis and nonmanufactured cannabis products were derived.
- Upon destruction or disposal of any cannabis or nonmanufactured cannabis products, Bask Ventures, Inc. will retire the applicable UIDs in the CCTT system within three (3) business days of the destruction or disposal. Any destruction or disposal of cannabis or nonmanufactured cannabis products will be performed in accordance with Bask Ventures, Inc.'s approved cannabis waste management plan.

When a clone reaches twelve inches in height or is transplanted into a growth medium (whichever occurs sooner), a tag with the associated UID will be securely attached to the plant or the plant's container that includes Bask Ventures, Inc.'s business name and license number, strain name, and any general information regarding the plant that is used for traceability. As the plant moves from the vegetative to flowering stages, the UID barcode of each plant being moved is scanned, their location updated within the system, and any important observations noted by the employee.

When plants are ready for harvest, the harvest data of every plant is entered into the CCTT system until all plants of that strain are harvested into a batch. As each plant's UID barcode is scanned, selecting the harvest option will prompt the user to enter the wet weight of the entire plant, along with any waste that was generated by the plant at the time of harvest. As the plant is further broken down, the wet weight of the flowers and trim are entered separately. When the final plant has been harvested, the harvest batch is assigned a new UID. Scanning a harvest batch UID barcode will provide details such as harvest date and strain name along with the plant history and associated UID barcode for each individual plant that makes up the batch.

As the harvested flowers dry, the CCTT system will allow Bask Ventures, Inc. to track the dryness of the batch throughout the drying process until it reaches the cure stage. During cure, employees will scan the harvest batch UID barcode as they regularly agitate the flowers on each drying rack and check the moisture content. They are then able to immediately note the moisture content results and any other important observations into the harvest details screen of the CCTT system.

Testing

As cannabis plants are harvested, trimmed, dried, and cured, they are aggregated into a harvest batch. After the QAM determines the batch has been properly cured by passing all internal quality control checks, the QAM will contact a licensed testing laboratory [16 CCR § 5002, 5702/5703] and arrange for the transport of samples of each harvest batch for required testing via contracted licensed professional distributor services [16 CCR § 5002 (29) (C) (iii)].

The QAM will record the batch number for each sample taken, along with the date, the time, and the name and employee ID of the employee who collected the samples. Laboratory testing information will confirm the product safety, cannabinoid profile, terpene profiles, and any

additional State-required testing results. Once laboratory test results for a harvest batch are returned, they will be entered into the CCTT system by the QAM, where the harvest batch information and associated test results are then transferred to the harvest batch label. As stated in 3 CCR § 8211, Bask Ventures, Inc. will not accept returns of cannabis plants or nonmanufactured cannabis products after transferring possession of them to another licensee after testing is performed (pursuant to BPC § 26110).

Bask Ventures, Inc. will store packaged harvest batches at the facility under quarantine until the completion of required laboratory testing. Each harvest batch will be easily distinguishable from other harvest batches until it is broken down into packages. No cannabis will be sold by Bask Ventures, Inc. prior to receiving laboratory test results for its associated harvest batch.

Individual testing results will be entered into the CCTT system by the testing laboratory along with a "pass/fail" designation for each batch. The QAM will review test results upon receipt to determine if the batch meets Bask Ventures, Inc.'s strict quality control standards and will release the tested cannabis for packaging upon approval.

Bask Ventures, Inc. may sell cannabis or cannabis products created prior to the implementation of the Medicinal and Adult-Use Cannabis Regulation and Safety Act that have not been tested. If so, the cannabis or cannabis products will have a label affixed to each package that clearly states, "This product has not been tested as required by the Medicinal and Adult-Use Cannabis Regulation and Safety Act."

During packaging for final sale, harvest batches of cured flower are sorted into either bulk packaging for wholesale customers or child-resistant packaging prepared for retail sale through dispensaries (please see Bask Ventures, Inc.'s Packaging and Labeling plan for detailed policies and procedures). The ICM will create a package with a UID within the CCTT system that mirrors each physical package to be shipped. By scanning the package UID barcode, any dispensary or processor will be able to see unique harvest batch associated with the package and, subsequently, the cultivation details of every single plant that was harvested to create the item(s) within that package.

Sending Shipments

Once package weights and labeling have been approved by the ICM, packaging employees will ensure the associated transfer manifest is included in the shipment container's external clear packing list envelope. When a shipment is ready to leave the facility, the ICM will visually inspect all outgoing packages, count or weigh all items, and compare the packages with the accompanying transport manifest. The QAM will also review packaging and labeling to confirm the ICM's visual inspection and ensure that the packaging of each item is undamaged, accurate, and complete and to verify no tampering of the packages has occurred. The inspection results will be recorded on the Shipping Checklist. Any incorrectly packaged, damaged, or noncompliant packages or labels will be corrected by a packaging employee. Any errors in the transport manifest will be corrected within the CCTT system by the ICM. Once the shipment has been inspected and approved by the ICM and QAM, it will be authorized for transport by a registered, licensed distributor. The ICM will contact a registered, licensed distributor for pickup.

Receiving Shipments
Bask Ventures, Inc. anticipates shipments to the cultivation facility will be primarily restricted to receiving non-cannabis inventory items, such as grow and office supplies. The facility will receive only one delivery at a time from approved vendors. The date received will be recorded on the outside of each package, and a use-by date, if applicable.

Should Bask Ventures, Inc. receive any shipments from another licensed cultivator (replenish inventory) or dispensary (in the event of a recall), the ICM will check in shipments under clear view of the surveillance cameras and the delivering vendor. They will visually inspect each package received, count and/or weigh all items, and compare the inspection results with the transport manifest received with the shipment. The ICM will then record their inspection results on the Product Acquisition Log confirming that the packaging and labeling of each item is undamaged, accurate, and complete. If any package fails inspection by the ICM, it will be noted as rejected on the physical transport manifest and in the CCTT system along with the reason for the rejection. The ICM acting as the CCTT account manager will report in the system any and all cannabis or nonmanufactured cannabis products physically received or rejected from another licensee within 24-hours of receipt or rejection of the product [3 CCR § 8405].

Once the shipment has been inspected, the ICM will sign both copies of the transport manifest, keeping one for Bask Ventures, Inc.'s records and giving the second back to the delivering vendor. The ICM will then mark it as received in the CCTT system and confirm the inventory weight, quantity, description, shipping licensee information, batch and lot number, expiration date, and handling instructions for each item contained in the shipment. This will indicate to the State that the product in transit has arrived safely at its destination facility.

Products will be quickly transferred to their proper storage area to avoid potential contamination. Shipments of any cannabis or non-cannabis products will be rejected if:

- Goods are not at an acceptable temperature. Frozen goods should be solid and show no evidence of thawing and refreezing. Cold goods will be checked with a calibrated thermometer to ensure they are below 41°F.
- Packaging is damaged.
- Product quality is deemed unacceptable based on order specifications and quality requirements; evaluate quality of products by odor, sight, and touch.

Segregation and Disposal of Quarantined Product
Bask Ventures, Inc. will have a separate, locked, limited access area for the storage of cannabis that is expired, damaged, deteriorated, mislabeled, contaminated, recalled, or whose containers or packaging have been opened or breached until it can be returned to the originating cannabis facility, destroyed or otherwise legally disposed of.

All affected cannabis will be uniquely classified in the CCTT system and physically segregated within the facility as it is identified. The quarantined cannabis will be stored under constant video camera surveillance until properly disposed of. Access to the quarantined product room will be limited to the GM, ICM, and QAM; a minimum of two personnel will be required to be present in the room at all times. Quarantined items will be conspicuously labelled "QUARANTINED PRODUCT – DO NOT USE OR SELL."

If a recall of cannabis is required, Bask Ventures, Inc. will use the CCTT system to identify and locate affected products by their unique batch number. Once pinpointed, the sale or transfer of any packaged flower or finished products associated with the recalled harvest batch will be identified and communication with any purchasing facilities initiated within hours. Once safely quarantined, Bask Ventures, Inc. will coordinate the destruction or other legal disposal of the recalled cannabis with State.

Inventory Audits

In addition to ongoing inventory tracking in the CCTT system, Bask Ventures, Inc. will implement inventory controls and procedures necessary to conduct regular and random inventory reviews and comprehensive inventory audits at the facility. Inventory audits will be conducted by no less than two authorized employees, led by the ICM with the support of the GM and authorized cultivation agents.

Bask Ventures, Inc.'s comprehensive inventory review process will ensure that physical on-hand inventory within the facility is equal to the inventory numbers within the CCTT system for all seeds, immature cannabis plants (clones), mature cannabis plants, harvested cannabis, and packaged cannabis ready for sale.

Reoccurring inventory audit reports will be documented in both written and electronic forms and provided to the GM for review and filing with the State for compliance [3 CCR § 8408]. Reports will include the date of the audit, a summary of the inventory audit findings, and the names, signatures, and titles or positions of the individuals who conducted the inventory audit.

Daily Package Audits

As part of their daily job responsibilities, the ICM must conduct an abbreviated physical package inventory audit; each package barcode will be scanned to compile a list of current inventories, which is then compared against the CCTT system. If a package cannot be accounted for, the ICM will immediately check all applicable logs to ensure the package has not been transferred to another room or destroyed. If logs indicate the package was removed as part of a sale or transfer, the ICM will verify that the employee recorded on the log was the employee responsible for moving the inventory, and that the recorded reason is accurate. If the employee failed to record the information in the CCTT system, the ICM will correct the CCTT system and advise the MOD for appropriate disciplinary action.

If a missing package was destroyed or transferred, the ICM will verify that video surveillance for the action in question supports the recorded information on the associated log. If evidence of diversion, theft, loss, or criminal activity is discovered, the GM will report the theft or diversion to the State and law enforcement within 24 hours, but no later than three (3) business days [3 CCR § 8409].

Comprehensive Audits

On a weekly and monthly basis, the ICM will lead a complete inventory audit of the entire facility and compare it to the CCTT system. Product and plant UID barcodes will be scanned to take counts and weights recorded from properly calibrated digital scales. Upon completion, Bask

Ventures, Inc. will review the results and determine if further action is required. These audit reports will include (but are not limited to):

- The date of the inventory audit;
- The amount of cannabis on hand:
    - The total count of plants, whether in the flowering, vegetative, or clone phase of growth and organized by room in which the plants are being grown;
    - The batch number, weight, and strain name associated with each batch at the facility that has been quarantined for testing or ready for sale; and
    - The total number of plants and every unique plant identifier that have been harvested but are not yet associated with a batch.
- The amount of cannabis sold since previous inventory, which will include:
    - The date of sale;
    - The license number and name of the facility to which the cannabis was sold; and
    - The batch number, registered product name and quantity of cannabis sold.

If a package cannot be accounted for, it will be investigated according to same process as detailed for daily package audits. If the ICM discovers a discrepancy in the weight of a package that is too significant to attribute to typical moisture loss, they will re-weigh the package to verify the discrepancy. If the discrepancy is found to be true, the ICM will review the related logs and surveillance footage to determine the cause. If logs indicate that any part of the package was removed as part of a sale or transfer, the ICM will verify with the employee recorded that the employee was responsible for moving the inventory, the recorded reason is accurate, and the discrepancy in weight is comparable to the sold product. If the employee failed to record the information in the CCTT system, the ICM will correct the CCTT system and advise the MOD to take appropriate disciplinary action.

When the monthly inventory audit has been completed, the management team will compile a report for reconciliation. This report will include, at minimum, the name, job title, and employee ID number of each employee involved in the inventory audit, along with the date and time of the audit, any discrepancies, and the findings of any inventory investigations.

Annually, Bask Ventures, Inc. will conduct a complete review of all inventory discrepancies and produce a comprehensive inventory report. This report will include the date of each inventory audit, the results of each audit, any further investigations or other actions and the outcome, and any other relevant information relating to the annual report. Records of all inventory audits and annual reports will be maintained onsite according to Bask Ventures, Inc.'s Recordkeeping policies and will be provided to authorized law enforcement upon request.

The State, at its discretion and without requiring prior notice, may perform an audit of the physical inventory and inventory as reported in the CCTT system during standard business hours (8:00am-5:00pm), or other mutually agreed upon time [3 CCR § 8408]. Neither Bask Ventures, Inc. nor any of its employees or agents will interfere with, obstruct, or impede the State's inspection, investigation, or audit, including denying the State access to the licensed premises; providing false or misleading statements; providing false, falsified, fraudulent or misleading documents and records; or failing to provide records, reports, and other supporting documents.

Upon completion of an inspection, investigation or audit, the State will notify Bask Ventures, Inc. of any violation(s) and/or action(s) the State is taking [3 CCR § 8501].

Packaging and Labeling

Packaging and labeling of cannabis are an essential part of compliance as well as patient, product, and public safety. Packaging should preserve the integrity and quality of cannabis plant material being sold to consumers. Labeling should be clear and informative, containing associated weights, cannabinoid profiles, batch number, harvest date, expiration date, and all other legally required elements. Bask Ventures, Inc. will maintain strict standard operating procedures (SOPs) to ensure that cannabis is packaged and labeled as required by CalCannabis and the Bureau of Cannabis Control ("the State") using industry best practices in a manner to protect the health and safety of patients and the general public.

Bask Ventures, Inc. is confident in the ability to produce a safe, consistent supply of cannabis and minimize the deviation in quality of harvest batches. All cannabis and cannabis product weighing, counting, packaging, and labeling operations will be performed in designated areas in the cultivation facility in full view of surveillance cameras at all times. At least two employees will be present during all packaging, labeling, and shipment operations.

Packaging and Labeling Overview

The Quality Assurance Manager (QAM) will verify the compliance and accuracy of all labels during design. When labels are first generated, the QAM will compare several samples from each printing batch before providing final approval. While standardized machinery, such as regularly calibrated scales and dedicated label printers, will help provide accurate and consistent packaging and labeling of all products, regular checks will be conducted by the QAM to maintain quality assurance standards. Results of all quality control inspections will be maintained on site and made available to authorities upon request.

Bask Ventures, Inc. will also draw on the experience of Medicine Man Technologies (MMT), their selected cultivation consultants, for advice on sourcing reputable vendors for packaging materials, labels, and equipment. MMT has been actively engaged in the cannabis industry since 2009 and has considerable expertise in sourcing quality and compliant packaging and labeling for a variety of products that satisfy strict state regulations.

In addition to serving as the tracking mechanism for cannabis through the California Cannabis Track and Trace (CCTT) system, all labels and tags will be designed to communicate everything that has occurred within each production batch to other cannabis facilities and the State. Comprehensive internal labeling standards and checklists will ensure the labels properly display all necessary information; this will include residual moisture content, plant weights, cultivation time, strain profile, cannabinoid profiles, terpene profiles, nutrients and other crop inputs such as pesticides and fertilizers. Collectively, this information will aid manufacturers in the creation of cannabis products at their facilities.

The State may periodically update regulations and expand packaging and labeling requirements. The QAM will review the State's websites regularly and subscribe to bulletin and/or communication portals to stay abreast of regulatory changes. This will ensure Bask Ventures, Inc. receives the most up-to-date information on California cannabis regulations. Changes in regulation that impact Bask Ventures, Inc. labels in particular, will be communicated through the proper channels and acted upon in a timely manner.

Testing

As cannabis plants are harvested, trimmed, dried, and cured, they are aggregated into a harvest batch. After the QAM determines the batch has been properly cured by passing all internal quality control checks, the QAM will contact a licensed testing laboratory [16 CCR § 5002, 5702/5703] and arrange for the transport of samples of each harvest batch for required testing via contracted licensed professional distributor services [16 CCR § 5002 (29) (C) (iii)].

The QAM will record the batch number for each sample taken, along with the date, the time, and the name and employee ID of the employee who collected the samples. Laboratory testing information will confirm the product safety, cannabinoid profile, terpene profiles, and any additional State-required testing results. Once laboratory test results for a harvest batch are returned, they will be entered into the CCTT system by the QAM, where the harvest batch information and associated test results are then transferred to the harvest batch label. As stated in 3 CCR § 8211, Bask Ventures, Inc. will not accept returns of cannabis plants or nonmanufactured cannabis products after transferring possession of them to another licensee after testing is performed (pursuant to BPC § 26110).

Bask Ventures, Inc. will store packaged harvest batches at the facility under quarantine until the completion of required laboratory testing. Each harvest batch will be easily distinguishable from other harvest batches until it is broken down into packages. No cannabis will be sold by Bask Ventures, Inc. prior to receiving laboratory test results for its associated harvest batch.

Individual testing results will be entered into the CCTT system by the testing laboratory along with a "pass/fail" designation for each batch. The QAM will review test results upon receipt to determine if the batch meets Bask Ventures, Inc.'s strict quality control standards and will release the tested cannabis for packaging upon approval.

Bask Ventures, Inc. may sell cannabis or cannabis products created prior to the implementation of the Medicinal and Adult-Use Cannabis Regulation and Safety Act that have not been tested. If so, the cannabis or cannabis products will have a label affixed to each package that clearly states, "This product has not been tested as required by the Medicinal and Adult-Use Cannabis Regulation and Safety Act."

Label Design

Labels will provide all legally required and critically important information to licensed manufacturers and dispensaries, consumers, employees and all state agencies involved in the oversight of cannabis [3 CCR § 8212]. Labels may specify the county of origin if 100% of the cannabis or nonmanufactured cannabis product contained within was produced in the designated county, as defined by its finite political boundaries [3 CCR § 8212 (b)].

All information will be saved electronically for compliance and tracking purposes. All labels will be written in English, unobstructed, and conspicuously placed on and/or securely fastened to the package. All labels will be printed on weather-resistant and tamper-resistant materials. Employees may not knowingly or intentionally alter, obliterate, or otherwise destroy any label

attached to an approved container. Bask Ventures, Inc. will utilize standardized equipment, including a Zebra™ printer, to provide accurate and consistent labeling.

Bask Ventures, Inc. labeling includes Product Branding Labels, Batch Labels, Package Barcodes, and Shipping Containers.

Product Branding Labels

Any cannabis packaged for individual sale directly to a qualifying patient (no repackaging required by the dispensary) will first receive a product branding label—or "primary" label. The initial conceptual designs will include the main branding and usage label with information that is standard for each unit. Packages and labels will not be made attractive to children [10 BPC §26120 (b)]. All cannabis and cannabis product labels and inserts—including the required "Information Panel"—will include the following information prominently displayed in a clear and legible fashion in accordance with the requirements, including font size, prescribed by the State [10 BPC § 26120]:

- Name, address and permit number of Bask Ventures, Inc. as cultivating facility;
- The California Universal Symbol;
- For packages containing only dried flower, the net weight of cannabis in the package in U.S. customary and metric units;
- Identification of the source and date of cultivation, the type of cannabis or cannabis product and the date of manufacturing and packaging (strain name and/or species—sativa, indica, hybrid);
- The appellation of origin, if any;
- List of pharmacologically active ingredients, including, but not limited to, tetrahydrocannabinol (THC), cannabidiol (CBD), and other cannabinoid content, the THC and other cannabinoid amount in milligrams per serving, servings per package, and the THC and other cannabinoid amount in milligrams for the package total;
- Complete list of all nonorganic pesticides, fungicides, and herbicides used during cultivation;
- A warning if nuts or other known allergens are used;
- Information associated with the unique identifier (UID) issued by the Department of Food and Agriculture;
- The product's date of expiration, "use by" date, and/or "best by" date;
- For a medicinal cannabis product sold at a retailer, the statement "FOR MEDICAL USE ONLY";
- Any relevant instructions for usage, including how to apply or consume the product, as well as any potential preparation required before use.;
- Storage instructions;
- The following statements, in bold print [until the U.S. Attorney General determines that cannabis is no longer a Schedule I controlled substance under federal law]:
    - For cannabis: "GOVERNMENT WARNING: THIS PACKAGE CONTAINS CANNABIS, A SCHEDULE I CONTROLLED SUBSTANCE. KEEP OUT OF REACH OF CHILDREN AND ANIMALS. CANNABIS MAY ONLY BE POSSESSED OR CONSUMED BY PERSONS 21 YEARS OF AGE OR OLDER UNLESS THE PERSON IS A QUALIFIED PATIENT. CANNABIS USE WHILE PREGNANT OR BREASTFEEDING MAY BE HARMFUL.

CONSUMPTION OF CANNABIS IMPAIRS YOUR ABILITY TO DRIVE AND OPERATE MACHINERY. PLEASE USE EXTREME CAUTION."

- For cannabis products: "GOVERNMENT WARNING: THIS PRODUCT CONTAINS CANNABIS, A SCHEDULE I CONTROLLED SUBSTANCE. KEEP OUT OF REACH OF CHILDREN AND ANIMALS. CANNABIS PRODUCTS MAY ONLY BE POSSESSED OR CONSUMED BY PERSONS 21 YEARS OF AGE OR OLDER UNLESS THE PERSON IS A QUALIFIED PATIENT. THE INTOXICATING EFFECTS OF CANNABIS PRODUCTS MAY BE DELAYED UP TO TWO HOURS. CANNABIS USE WHILE PREGNANT OR BREASTFEEDING MAY BE HARMFUL. CONSUMPTION OF CANNABIS PRODUCTS IMPAIRS YOUR ABILITY TO DRIVE AND OPERATE MACHINERY. PLEASE USE EXTREME CAUTION."

- Any other requirement set by the Bureau or the State Department of Public Health; and
- Poison hotline number

A product Primary Panel will contain the product's ID/name with text relatively sized to be the most prominent text on the package, with a font size of 6 or greater. The phrase "cannabis-infused" will appear directly above the product ID/name in bold text and in a font size that is larger than the product ID/name. The product's content per serving of both THC and CBD, will appear written in units of milligrams per serving.

All of Bask Ventures, Inc.'s branding labels will encourage consumers to visit their website for further information so that patients may review the label on-line and enlarge anything they may have had difficulty reading on the package. The website will include instructions on understanding the meaning and importance of the different sections of each label.

Bask Ventures, Inc.'s website will emphasize safe use by providing information about the safe ingestion of products and dosage information. This educational website will reference all state information pertaining to allowed medical conditions and public notices and include useful resources such as a link to the national Poison Helpline number. The Poison Helpline will also be included on all labels as per the Federal Drug Administration website for consumers.

Batch Labels

"Batch" or "harvest batch" means a specifically identified quantity of dried flower or trim, leaves, and other cannabis plant matter that is uniform in strain, harvested in whole, or in part, at the same time, and, if applicable, cultivated using the same pesticides and other agricultural chemicals [3 CCR § 8000]. Each harvest batch is assigned a unique harvest batch name that will be associated with all UIDs for each individual plant, or portion thereof, contained in the harvest batch [3 CCR § 8403 (c)]. Batch labels will include all harvest batch specific identification information and test results. Any information that varies from batch to batch will be included on this sticker. Batch labels are generated from the CCTT system by the ICM and affixed during packaging to both 1) individual unit containers within packages and 2) the outside of the shipping container. The information on this label will include the following:

- Harvest batch UID
- Harvest date
- Name of the testing laboratory

- Laboratory test batch numbers and dates, if applicable
- Laboratory testing results
    - Cannabinoid profiles and potency; percentage of THC, CBD, THCA, CBDA, and CBN
    - Microbials
    - Heavy metals
    - Pesticides
- Expiration date

Package Barcodes

Package UID barcodes are generated from the CCTT system by the ICM and affixed during packaging. A "package" within the CCTT system is any individual parcel designated for a single recipient comprising one or more individual unit containers of product generated from the same harvest batch. For example, one package UID may contain twenty 1g retail containers and fifteen 3.5g containers, all generated from harvest batch AB1. Scanning a package UID barcode will provide the total count of items within the package and the weight of each item.

Shipping Containers

As packages are aggregated into shipments according to transport manifest and placed into a shipping container, the package Batch Label(s) will be affixed to the outside of the container. Shipping containers will have a clear packing list envelope on the exterior, featuring tamper proof 2 mil poly to protect the documents inside. The shipment transport manifest will be folded to display the name, address, and permit number of the receiving facility; this will allow for easy identification of the contents inside and inspection for compliance without requiring the shipment container or packages within to be opened.

Packaging Operations

Packaging employees will follow recordkeeping protocols requiring documentation of all packaging activities both in manual logs and in the CCTT system [3 CCR § 8400]; such documentation will include the names and ID numbers of both employees responsible for the packaging activity. All packaging activities that require weighing and measuring will utilize a digital scale. Calibration and maintenance of all scales used will be performed daily and documentation of daily calibration and periodic maintenance will be maintained on site.

Packaging and labeling areas will be inspected prior to use to ensure all previous plant, packaging and labeling materials have been removed. All equipment, utensils, and contact surfaces used for packaging cannabis will be cleaned and sanitized prior to use, throughout the packaging activity as required, and immediately after packaging is complete to keep all packaging components free of contaminants. Packaging employees will wear hair nets (and beard nets, if necessary) and nitrile gloves to prevent the contamination of plant material during packaging. Since dried cannabis produces airborne particles, employees will wear dust masks for their own protection.

The ICM will coordinate inventory packaging and shipping operations, maintaining an efficient shipment schedule while ensuring all inventory movement is accurately tracked in the CCTT

system. Harvest batches are designated into packages by weight by the ICM, who will input the information into the CCTT system 24 hours prior to the shipment delivery date.

The ICM will create a unique package inventory ID within the CCTT system that mirrors each physical package to be shipped. Package UIDs may comprise multiple individual unit containers, however all containers within the package will be from the same harvest batch, designated to the same recipient. Packages are then aggregated into shipments for individual recipients by generating a transport manifest. The ICM will organize the day's transport manifests, print labels, and create a list of exact inventory items and weights to be packaged into coordinating packaging breakdown sheets to guide the work of the packaging employees.

Weighing Plant Material

During packaging for final sale, harvest batches of cured flower are sorted according to bud size and placed into either bulk packaging for manufacturers and distributors or retail packaging for sale directly to consumers through dispensaries. Packaging employees will work with flower from one harvest batch at a time until all packaging from that harvest batch is complete. The employee will place a weigh tray on a digital scale and fill with flower until the scale reaches the quantity specified on the package breakdown sheet provided by the ICM. The employee will adjust the weight as needed by adding or removing smaller buds and removing any large stems or any other material that should be waste; results will be accurate to within 0.1g of the specified weights. Once the desired weight is achieved, the measured flower is poured into the designated retail or bulk packaging to create the individual unit. Individual units are sealed and affixed with their associated Harvest Batch Label. When all individual units for a specific harvest batch have been successfully sealed and labeled, they are boxed into one or more packages designated for shipment. Each package is then affixed with its associated Package UID Barcode. All packages on the same packaging breakdown sheet are set in a designated area along with any associated waste for verification of weights by the ICM prior to being approved for shipment.

Retail Packaging

Plant material for distribution to dispensaries will be packaged in pre-determined weights by strain. Bask Ventures, Inc. will utilize only the highest quality of medical and food grade packaging that meets both ASTM and CPSC child-safety standards. Selected products will be environmentally friendly and, if possible, manufactured within the United States. To best preserve the quality and integrity of cannabis flower, Bask Ventures, Inc. will utilize hard sided containers that are light resistant and prevent crushing of the material (versus plastic bags). Bask Ventures, Inc. will maintain ASTM or CPSC certificates for all supplied packaging.

Bulk Packaging

Bask Ventures, Inc. will be licensed as a weighmaster for bulk shipments of cannabis and nonmanufactured cannabis products [3 CCR § 8213 (d)]. Plant material for distribution to processors and distributors will be packaged in vacuum sealed bags in one or two-pound quantities ready for bulk transport. Opaque Mylar bag rolls will allow for variable package sizes based on individual orders. Bask Ventures, Inc. will utilize an industrial, food grade tabletop vacuum packing machine with a heat sealer; this machine will feature vacuum level sensors that allow packages to be vacuumed to a precise level to ensure consistent weights and seal quality.

Sending Shipments

Once package weights and labeling have been approved by the ICM, packaging employees will ensure the associated transfer manifest is included in the shipment container's external clear packing list envelope. When a shipment is ready to leave the facility, the ICM will visually inspect all outgoing packages, count or weigh all items, and compare the packages with the accompanying transport manifest. The QAM will also review packaging and labeling to confirm the ICM's visual inspection and ensure that the packaging of each item is undamaged, accurate, and complete and that no tampering of the packages has occurred. The inspection results will be recorded on the Shipping Checklist. Any incorrectly packaged, damaged, or noncompliant packages or labels will be corrected by a packaging employee. Any errors in the transport manifest will be corrected within the CCTT system by the ICM. Once the shipment has been inspected and approved by the ICM and QAM, it will be authorized for transport.

Responsible Advertising and Marketing

Bask Ventures, Inc. is committed to responsible advertising that is compliant with the Medicinal and Adult Use Cannabis Regulation and Safety Act [10 BPC § 26120 (b)] and educates the public about the safe use of cannabis while discouraging any prohibited consumption and preventing diversion of the product to minors.

Labels will avoid any graphics or other images that may cause the product to be mistaken for anything but cannabis. Labels will be designed without any untruthful or misleading claims, information, or designs, including any government insignia or implication of approval or endorsement by any government agency, including the State of California [5 BPC § 12601]. Bask Ventures, Inc. labels will never contain a health claim that is not supported by the totality of publicly available scientific evidence and for which there is significant scientific agreement. Should a third-party certifier provide approval or certification regarding Bask Ventures, Inc.'s cultivation practices, Bask Ventures, Inc. will ensure the third-party certifier does not have a direct or indirect financial interest in any cannabis facility licensed in the state and that the certification protocols used by the third-party certifier have been reviewed and approved by the State.

Bask Ventures, Inc. holds the safety of children as its highest priority, and extra precautions will be taken during the design phase to ensure product labels do not appeal to them. Labels will not include any image bearing a resemblance to a cartoon character, fictional character, or pop culture icon whose target audience is children or youth [10 BPC §26120 (b)]. Labels and packaging will also avoid any resemblance to commercially-produced or trademarked foods or beverages. Bask Ventures, Inc. will not engage in any marketing, advertising, or design product labeling and packaging that may have a high likelihood of reaching anyone under the age of eighteen.

Product Samples

Bask Ventures, Inc. encourages providing product samples to dispensaries to allow dispensary owners, patients, and caregivers the opportunity to see and smell plant material before purchase. The sample will not contain more than three grams of a particular strain of cannabis will and be packaged in a sample jar protected by a plastic or metal mesh screen. The sample jar and the

plant material within will be prohibited to be sold to a patient or caregiver and will be destroyed by the dispensary according to regulatory requirements.

Facility Storage Plan

Proper facility storage requires strategic planning to minimize the risk of theft, diversion, unauthorized access, mishandling of sensitive materials, manipulation of inventory controls, cross-contamination, and spoilage of harvested cannabis. To achieve the highest level of customer, product, and public safety, Bask Ventures, Inc. has developed comprehensive standard operating procedures (SOPs) to ensure strict storage protocols are enacted throughout the cultivation facility. The Inventory Control Manager (ICM) will be responsible for inventory receipt, inspection, storage, packaging, and distribution of products under the supervision of the General Manager (GM). Bask Ventures, Inc.'s property diagram shows the location, type, and capacity of each storage unit to be used for cultivation, including harvested cannabis and designated pesticide and other agricultural chemical storage areas [3 CCR § 8105 (d) (2); § 8106 (a) (1) (C) and (H)].

Maintaining the quality and purity of cannabis plants and harvested flower is critical to customer safety and treatment efficacy. Therefore, all storage rooms will be consistently maintained in a clean and orderly fashion according to Bask Ventures, Inc.'s Sanitation Plan. Facility walls, floors, tables, and racks will be regularly sanitized and disinfected to prevent contamination or infestation by insects, rodents, birds, or other pests.

Cannabis Storage Overview

The storage and transport of cannabis will be conducted under conditions that protect against physical, chemical, and microbial contamination as well as against deterioration of any container or its contents. All cannabis inventory will be stored in a secure, limited access area as required by [16 CCR § 5042]. Limited access areas will have the most rigorous security measures in the facility, with the goal of eliminating the opportunity for potential contamination or diversion of cannabis. Storage areas will be securely locked and protected from entry at all times, except for the actual time required to remove or replace cannabis or complete required cleaning.

Bask Ventures, Inc. will outfit exterior and interior of storage rooms and work areas with surveillance camera(s) from a minimum of two juncture points so that several vantage points can be constantly viewed on security monitors. Employee movements will be traced through the security system as they make their way through the facility, including the unlocking of doors and safes in storage areas.

Cannabis will be consistently identified and tracked throughout the facility, with every change in plant stage or movement documented in the California Cannabis Track and Trace (CCTT) system. Should Bask Ventures, Inc. have any suspicion of diversion or become subject to an investigation by CalCannabis, Bureau of Cannabis Control, or authorized law enforcement (the "State"), the combination of security access controls, video surveillance, manual logs, and inventory details from the CCTT system can all be simultaneously reviewed for the desired period to clearly identify discrepancies and pinpoint the exact time and nature of any deviation.

The ICM will take responsibility for keys and access codes to the secure inventory storage room; staff will be trained to report evidence of unauthorized access to the ICM. Cannabis plants or products that are damaged, defective, recalled, or otherwise designated for destruction/disposal will be stored in a dedicated, limited access storage area segregated from sellable inventory.

Storage Design
The facility is designed to provide adequate security, lighting, ventilation, temperature, humidity, space, and equipment for holding and storage operations. Separate areas are available to store cannabis that is outdated, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or damaged until they can be disposed of.

Storage Area Climate Control
Environmental controls will maintain storage areas at desired temperature and humidity levels. Air in the storage areas will be continuously circulated, filtered, and cooled to help ensure dry storage temperatures remain between 50°F and 70°F and humidity remains at less than 15%. Heat producing equipment will be used in dry storage areas only if the temperature drops below 50°F. Products and supplies requiring refrigeration will be kept at 41°F or below and freezers at 0°F or below.

Security Controls
Strict access controls will be maintained for storage areas that include both physical security (programmable keycards, 24/7 video surveillance, passive infrared motion detectors, etc.) and procedural/systematic measures (user limitations within the CCTT system, consistent inventory audits, maintenance of visitor and internal logs, etc.) to ensure all employees, plants and products are accounted for at all times.

Bask Ventures, Inc.'s security vendor(s) will install, monitor, and maintain facility camera monitoring and alarm systems in compliance with [16 CCR § 5044]; these systems will play an essential role in preventing diversion by detecting and preventing unauthorized entry that my lead to an adverse loss. Storage rooms will be equipped with electronic locks that automatically re-lock on use to ensure only authorized employees can enter a room. Electronic access logs will be automatically generated at each occurrence of a door opening, recording the date, time, and security credentials of the employee responsible.

As a limited access area, storage rooms will subject to Bask Ventures, Inc.'s two-person rule, requiring dual access to enter. As such, no one person will enter or be left alone in these rooms for any reason. Access to the secure storage areas will be limited to select authorized employees of Bask Ventures, Inc., with the electronic access locks keyed only to those individuals. A current roster will be maintained onsite. The following additional security precautions will be followed at all times:

- All plant and package movements will be recorded within the CCTT system.
- Rooms are to remain secure when not in use or otherwise occupied.
- Company-issued uniforms must be worn by employees at all times.

Packaged, harvested cannabis will be further segregated within limited access areas and stored in a dedicated safe, storage refrigerator, or vault, utilizing the maximum amount of security possible in the facility. Following Federal Drug Enforcement Agency guidelines for the storage of a controlled Schedule I substance [DEA CFR 1301.72], any storage safe on the premises will be commercial-grade, made of metal, and will be large enough to store the cannabis items

anticipated to be on the premises at any given time. The safe will be bolted or cemented to a permanent structure if weighing less than 750 pounds.
Vaults will be installed away from exterior walls and constructed of steel-reinforced concrete, armored walling, or other building material designed to prevent infiltration or other unauthorized access by burglary or theft. In addition, the vault upon attempted unauthorized entry will transmit a signal directly to a central protection company and local and state police agencies that have a legal duty to respond or a 24-hour control station operated by the Bask Ventures, Inc.'s Security Vendor [DEA CFR §1301.72 (a)(1)(III)].

Visitor Access
Should a visitor require access to a secure storage area, for example during an inspection, the visitor will be required to provide company credentials along with a government issued ID and adhere to Bask Ventures, Inc.'s strict visitor policies. No visitor will be allowed to touch cannabis plants or handle cannabis packages at any time unless necessary for the completion of their official duties as required by State regulations.

A Facility Visitor Log will be filled out any time an authorized visitor is escorted into the facility. All visitors will be issued a badge that must be conspicuously displayed for the duration of their visit. They will remain escorted by an authorized employee while on the premises. The Facility Visitor Log be maintained onsite and regularly backed up electronically according to Bask Ventures, Inc.'s Recordkeeping SOPs. The Facility Visitor Log will include:

- Visitor name,
- Name of cultivation agent assigned to escort the visitor,
- Purpose of visit,
- Time of arrival, and
- Time of departure.

Inventory Controls
Pursuant to [3 CCR § 8402], Bask Ventures, Inc. will use the CCTT system to ensure proper accounting of inventory through chain-of-custody tracking. From the time start-up inventory first arrives at the facility to the time harvested cannabis is sold to a purchasing facility, the plant or package's location within the facility will be tracked. All stages of inventory receipt, inspection, storage, and distribution will be recorded in the relevant locations throughout the CCTT system, and on manual logs that will support the information included in the CCTT system.

Receiving Shipments
Bask Ventures, Inc. anticipates shipments to the cultivation facility will be primarily restricted to receiving non-cannabis inventory items, such as grow and office supplies. The facility will receive only one delivery at a time from approved vendors. The date of sale, transfer, receipt, and a use-by date, if applicable, will be recorded on the outside of each package [3 CCR § 8401 (c); § 8405 (b) and (d)].

Whether receiving or preparing to send a shipment, the area for loading and unloading of cannabis into or from a transport vehicle will be enclosed, secure, and out of public view. Within this secure area, arriving cannabis is segregated from the current facility inventory in a limited access storage area. Shipments received by the facility will go immediately into this receiving

area for inspection by the ICM. Once the shipment has passed inspection (see Inventory Control for Bask Ventures, Inc.'s policies and procedures), the ICM will mark the products as received in the CCTT system and note that they have been physically transferred to the limited access storage area. Products will be quickly transferred to their proper storage area to avoid potential contamination.

Storage Related Records

Storage recordkeeping will confirm that storage area environments are consistently maintained at the correct temperature and humidity and in a sanitary condition. Recordkeeping will also track chain-of-custody, inventory quantities, and important product dates such as date of receipt, production date, and use-by date. The following are examples of recordkeeping logs that will be utilized throughout the facility:

- Temperature Logs - To document the temperature of all climate-controlled storage areas. Any deviation will be addressed and corrected immediately. Corrective action will be recorded.
- Sanitation Logs - To document daily cleaning and sanitation of areas.
- Inventory Logs - To document with direct observation and supervisor confirmation the inventory of all cannabis product at the beginning and end of every day.

Employee Training

Employees will be trained on storage protocols before beginning to work for Bask Ventures, Inc.. The full set of SOPs will be maintained by the GM and the Quality Assurance Manager (QAM) and disseminated to employees as part of their training process. Any future process changes to the storage SOPs will be documented and employees will be re-trained as the procedure is applied within the operating environment. Confirmation of this training will be recorded and kept within employee files.

Storage Methods and Procedures

Various storage SOPs will be implemented throughout multiple areas of the facility depending on product storage requirements. Any physical, material, or substantial modification to Bask Ventures, Inc.'s harvest storage and chemical storage areas will first be approved in writing from the Department [3 CCR § 8205 (a) (1)].

Seeds, Immature Cannabis Plants (Clones), Cannabis Plants, Mother Plant Storage

Process Oversight and Validation Responsibility: Cultivation Manager, Inventory Control Manager (ICM)
Tasking Assigned Responsibility: Lead Cultivation Agent, Cultivation Team
Access Requirement: Limited to Cultivation Team, controlled by key fob or access code
Description: Dedicated climate-controlled rooms will be utilized for all genetics, composed of seeds, clones, mother plant genetics, and cannabis plants. These climate-controlled environments will be maintained through the use of HVAC equipment that will provide electrostatic, pre-static and UV-static filtration. The closed loop systems will temper the environment through charging the existing air, consistently removing contaminants from the environment. It will monitor, record and regulate the temperature, humidity, and CO_2 levels within the rooms.

Dried and Cured Plant Material Storage

Process Oversight and Validation Responsibility: Cultivation Manager, ICM
Tasking Assigned Responsibility: Harvest Team Lead, Dry/Cure Team
Access Requirement: Dual control; a security procedure whereby the active involvement of two individuals is required to gain access, controlled by key fob or access code.
Description: Once a cannabis plant has been harvested and trimmed, the plant byproducts (i.e., tight trim and finished flower) will be taken to a dedicated secure room to begin the dry and cure process. The environment for this dedicated room will be maintained by use of an HVAC (or equivalent) unit designed to create an exceptionally clean and sanitary environment. Drying will typically take between 7 to 10 days. Lights in this room will remain off unless personnel are working in the room to help the plants maintain and preserve their cannabinoid profiles. Within this room specialized drying racks will be utilized for the purpose of segregating each plant and allowing them to dry naturally.

Packaged Cannabis Storage
Process Oversight and Validation Responsibility: GM
Tasking Assigned Responsibility: ICM, Manager on Duty (MOD)
Description: Access to this area is limited to the GM, ICM, and QAM. Shelving units for storing cannabis packages will be no less than six inches off the floor and away from walls. Shelving, racks, and tables will be NSF International certified. cannabis packages will not be stored in vestibules, hallways, bathrooms, garbage rooms, mechanical rooms, or other common areas in the facility. Water pipes and similar utilities passing through storage areas will be insulated and self-contained. Storage areas will be controlled and monitored for temperature and humidity to assure product quality.

All packages stored in the facility will be clearly labeled to ensure proper execution of First In, First Out (FIFO) storage protocols. FIFO is a necessary practice for quality assurance, ensuring the efficient and safe rotation of packages and products through the facility by always utilizing those with the soonest expiration date first. Clear labelling and FIFO protocols also prevent inadvertent losses from mismanaged inventory and allow for accurate inventory counts and efficient inspections by allowing individuals to quickly observe the contents of a storage area. Packages stored in the secure storage room will be clearly labeled with the common name and date, then organized by type and sorted according to their expiration dates; the first products to expire will be placed at the front of any shelf. The ICM and the GM will maintain a FIFO log and will be responsible for enforcing this requirement. The FIFO log will contain:

- Product name,
- Date of product arrival,
- Expiration date,
- FIFO rotation date,
- Employee ID number, and
- Manager signature.

Damaged or Defective Cannabis Storage
Process Oversight and Validation Responsibility: Cultivation Manager, ICM
Tasking Assigned Responsibility: Lead Cultivation Agent
Access Requirement: Dual control; a security procedure whereby the active involvement of two people is required to gain access, controlled by key fob or access code

Description: Bask Ventures, Inc. will have a separate, locked, limited access area for the storage of seeds, clones, cannabis plants and cannabis that is expired, damaged, deteriorated, misbranded, mislabeled or contaminated, or whose containers or packaging have been opened or breached, that are designated for disposal. This area will also store any plant material considered waste that is awaiting destruction, such as stocks, stems, dry and crispy leaves, topping and pruning material, aged mother plants, and deficient clones that did not root.

All affected cannabis will be uniquely classified in the CCTT system and physically segregated within the facility as it is identified. The quarantined cannabis will be stored under constant video camera surveillance until properly disposed of. Access to the quarantined storage room will be limited to the GM, ICM, and QAM; a minimum of two personnel will be required to be present in this room at all times. Quarantined items will be conspicuously labeled "QUARANTINED PRODUCT – DO NOT USE OR SELL."

Grow Medium, Pots, and Consumables Storage
Process Oversight and Validation Responsibility: Cultivation Manager, ICM
Tasking Assigned Responsibility: Lead Cultivation Agent, Cultivation Team Agent
Access Requirement: Limited to Cultivation Team, controlled by key fob or access code
Description: The cultivation facility will have a large shipping and receiving area with workstations setup for managing inbound and outbound shipments. In proximity to this, an area will be equipped with steel industrial shelving units dedicated for the storage of grow medium, pots, and consumables. These shelves will be cleaned regularly and maintained in good order and condition. Both new and used 1-gallon, 5-gallon and 7-gallon pots will be stored on the shelves. Pots have a lifespan of about 3 to 4 harvest cycles before they can no longer be reused. Once a plant is harvested, the old grow medium in the pot will be removed for waste disposal and the pot will be cleaned at the pot washing station. New and sterilized pots will be placed on the steel shelves. The grow media will typically arrive at the facility on large pallets. The pallets will be placed in a dedicated corner of the shipping/receiving area next to the industrial soil mixer. The placement of these pallets will not impede the workflow process.

Nutrient, Pesticide, Herbicide, Miticide, Fungicide Storage
Process Oversight and Validation Responsibility: Cultivation Manager, ICM
Tasking Assigned Responsibility: Lead Cultivation Agent
Access Requirement: Dual control; a security procedure whereby the active involvement of two people is required to gain access, controlled by key fob or access code
Description: Bask Ventures, Inc. will only use pesticides, fungicides, miticides, and herbicides that are approved by the California Department of Pest Regulation (DPR). The area used to store nutrients, pesticides, herbicides, miticides, and fungicides will be cleaned and sanitized in a manner that prevents contamination and in a manner that otherwise complies with other applicable laws and regulations. Food- and industrial-grade stainless steel shelving units will be used to store cleaning compounds in a secure manner. The shelves will be well organized with all product labels facing outward adhering to FIFO (First-In, First-Out) protocols. A log sheet will be utilized to track and record the product name, amounts of fertilizer and growth additives used, the rate, dates and time, and the employee ID number. Safety Data Sheets (SDS) for nutrients, pesticides, herbicides, miticides, and fungicides will be kept in a binder (please see

Appendix C – SDS Binder) within this secured area with easy access. This area will be under constant video surveillance from several vantage points.

For all pesticides that are exempt from registration requirements, Bask Ventures, Inc. will comply with the following pesticide application and storage protocols [3 CCR § 8307]:

- Comply with all pesticide label directions;
- Store chemicals in a secure building or shed to prevent access by wildlife;
- Contain any chemical leaks and immediately clean up any spills;
- Apply the minimum amount of product necessary to control the target pest;
- Prevent offsite drift;
- Will not apply pesticides when pollinators are present;
- Will not allow drift to flowering plants attractive to pollinators;
- Will not spray directly to surface water or allow pesticide product to drift to surface water. Spray only when wind is blowing away from surface water bodies;
- Will not apply pesticides when they may reach surface water or groundwater; and
- Only use properly labeled pesticides. If no label is available consult the Department of Pesticide Regulation.

Toxic Cleaning Compounds, Sanitizing Agents, Solvents, Chemicals Storage
Process Oversight and Validation Responsibility: Cultivation Manager, Maintenance Manager, ICM
Tasking Assigned Responsibility: Maintenance Team
Access Requirement: Limited to Cultivation Team, controlled by key fob or access code
Description: The cultivation facility will have a dedicated, locked room or closet for storage of toxic cleaning compounds, sanitizing agents, solvents, and chemicals. Employees will only use cleaning solutions registered with the United States Environmental Protection Agency (EPA) for use around vegetables, fruit, or medicinal plants in accordance with the instructions printed on the label. Refillable spray bottles used for cleaners or other fluids will be clearly labeled to indicate their contents to prevent misuse or accidental ingestion. Stored sanitizing and cleaning solutions, solvents and pesticide chemicals will be physically segregated from cultivation rooms to prevent contamination of cannabis. Containers will be stored with labels facing out and good FIFO protocols in place. Hard copies of the SDS for all hazardous chemicals to which employees may be exposed will be readily available in each chemical storage area in a designated SDS binder. SDS sheets will also be available in electronic format. Employees will be required to read the SDS for every chemical they use.

Legal Tender Storage (Vault)
Process Oversight and Validation Responsibility: GM
Tasking Assigned Responsibility: Cultivation Manager
Access Requirement: Dual control; a security procedure whereby the active involvement of two people is required to gain access, controlled by key fob or access code.
Description: All monetary and legal tender acquired in exchange for finished cannabis will be stored in a secured, limited access vault located on a centralized, non-exterior wall. To reduce the threat of burglary or theft, frequent daily and weekly deposits will be made to keep from having too much cash in the facility. Deposits will take place before the close of normal business hours, and before the close of bank hours, following required transportation regulations. Bask

Ventures, Inc. will engage a third-party security vendor utilizing armored vehicles with a secure storage lockbox to transport cash to the bank.

When selecting a safe for secure storage, Bask Ventures, Inc. will follow DEA Diversion Control and Controlled Substance Act (CSA) storage requirements to ensure the safety and security of customers, employees and the public. If the chosen safe weighs less than 750 lbs., it will be bolted or cemented to the floor in such a way that it cannot be removed. The safe will be equipped with an alarm system, which upon attempted break-in, will transmit a signal directly to a security vendor and local law enforcement.

Transport Vehicle Storage
Process Oversight and Validation Responsibility: GM, ICM, Security Manager
Tasking Assigned Responsibility: ICM, Security Manager
Description: The facility will have an enclosed, secure area out of public sight for the loading and unloading of cannabis into and from a transport vehicle. This secure transport area will be accessible via keypad or card by the Security Manager, ICM, or GM. The shipping and receiving bay will remain under constant surveillance. Transportation employees will remain with the vehicle at all times that cannabis products are on board or when the transport vehicle is in the bay.

Recordkeeping Storage
Process Oversight and Validation Responsibility: GM QAM
Tasking Assigned Responsibility: QAM, Office Manager
Description: Bask Ventures, Inc.'s recordkeeping plan will provide high-security, physical and electronic storage of all vendor, customer, and employee data, as well as the storage of all required records, security recordings, logs, and manifests [3 CCR § 8400]. All physical records will be kept in a locked file cabinet in a secure, limited access area with keys granted only to Bask Ventures, Inc.'s designated employees. These records will be scanned regularly to create an electronic backup. Information will then be backed-up on a secure electronic retention system to insure against the loss of data.

Shipping and Receiving Policies and Procedures

Pursuant to 16 CCR § 5311 (a), only persons or their employees holding a distributor license under the Medicinal and Adult-Use Cannabis Regulation and Safety Act may transport cannabis. To meet consumer demand, Bask Ventures, Inc. will contract with a licensed third-party cannabis distributor for all cannabis shipments and deliveries.

Distributors
Bask Ventures, Inc. will perform a review and approval of any distribution services prior to engagement that will include:

1. Confirm the company offers secure, licensed, insured and bonded transport.
2. Require completion of a questionnaire to establish contractor compliance as a part of the transportation contract between Bask Ventures, Inc. and the shipping contractor.
3. Perform a vehicle inspection to ensure the delivery vehicle is equipped with secure storage, GPS tracking and has all appropriate security and control modifications in accordance with state regulations. Vehicle must not display any identifying characteristics to indicate cannabis transport.
4. Perform vehicle inspection to ensure appropriate climate controls are consistent with requirements of the product shipment.
5. Retain the shipping contract and other documentation for the Bureau of Cannabis Control, CalCannabis, or any other authorized law enforcement agency ("the State") inspection.
6. Obtain a copy of company's state licensing for the transportation company and retain this information on file.
7. Confirmation that third-party employees are receiving training similar or consistent with Bask Ventures, Inc.'s in-house policies and procedures.

Shipping Overview
The Inventory Control Manager (ICM) will work with the Quality Assurance Manager (QAM), Security Manager, and General Manager to ensure shipping and personnel compliance with all Bask Ventures, Inc.'s transportation and shipping standard operating procedures (SOPs).

All packaged cannabis at the facility will be stored under quarantine until the completion of required laboratory testing. Upon the receipt of laboratory test results cannabis items will be inspected by the QAM prior to distribution and warehoused in an approved released-product storage area under appropriate environmental conditions consistent with its shelf life specifications and labeling.

In keeping with First In/First Out inventory principals, the oldest batch of an approved product with the shortest expiration date will be distributed first. A distribution history for each batch will be available in the California Cannabis Track and Trace (CCTT) system and will minimally include the unique batch number, receiving site, date, and quantity shipped.

Testing
As cannabis plants are harvested, trimmed, dried, and cured, they are aggregated into a harvest batch. After the QAM determines the batch has been properly cured by passing all internal quality control checks, the QAM will contact a licensed testing laboratory [16 CCR § 5002,

5702/5703] and arrange for the transport of samples of each harvest batch for required testing via contracted licensed professional distributor services [16 CCR § 5002 (29) (C) (iii)].

The QAM will record the batch number for each sample taken, along with the date, the time, and the name and employee ID of the employee who collected the samples. Laboratory testing information will confirm the product safety, cannabinoid profile, terpene profiles, and any additional State-required testing results. Once laboratory test results for a harvest batch are returned, they will be entered into the CCTT system by the QAM, where the harvest batch information and associated test results are then transferred to the harvest batch label. As stated in 3 CCR § 8211, Bask Ventures, Inc. will not accept returns of cannabis plants or nonmanufactured cannabis products after transferring possession of them to another licensee after testing is performed (pursuant to BPC § 26110).

Bask Ventures, Inc. will store packaged harvest batches at the facility under quarantine until the completion of required laboratory testing. Each harvest batch will be easily distinguishable from other harvest batches until it is broken down into packages. No cannabis will be sold by Bask Ventures, Inc. prior to receiving laboratory test results for its associated harvest batch.

The testing laboratory will enter individual testing results into the CCTT system along with a "pass/fail" designation for each batch. The QAM will review test results upon receipt to determine if the batch meets Bask Ventures, Inc.'s strict quality control standards and release for packaging upon approval.

Bask Ventures, Inc. may sell cannabis or cannabis products created prior to the implementation of the Medicinal and Adult-Use Cannabis Regulation and Safety Act that have not been tested. If so, the cannabis or cannabis products will have a label affixed to each package that clearly states, "This product has not been tested as required by the Medicinal and Adult-Use Cannabis Regulation and Safety Act."

Preparing Shipments

The ICM will coordinate inventory packaging and shipping operations, maintaining an efficient shipment schedule while ensuring all inventory movement is accurately tracked in the CCTT system. During packaging for final sale, harvest batches of cured flower is sorted into either bulk packaging for manufacturers and distributors or child-resistant packaging prepared for retail sale through dispensaries (please see Bask Ventures, Inc.'s Packaging and Labeling plan for detailed policies and procedures). Harvest batches are designated into packages by weight by the ICM, who will input the information into the CCTT system 24 hours prior to the shipment delivery date.

The ICM will create a package with a unique package inventory ID within the CCTT system that mirrors each physical package to be shipped. Package UIDs may comprise multiple individual unit containers, however all containers within the package will be from the same harvest batch, designated to the same recipient. Packages are aggregated into shipments for individual recipients. The ICM will then organize the day's transport manifests, print labels, and create a list of exact inventory items and weights to be packaged into coordinating packaging breakdown sheets to guide the work of the packaging employees.

Sending Shipments

Once package weights and labeling have been approved by the ICM, packaging employees will ensure the associated transfer manifest is included in the shipment container's external clear packing list envelope. When a shipment is ready to leave the facility, the ICM will visually inspect all outgoing packages, count or weigh all items, and compare the packages with the accompanying transport manifest. The QAM will also review packaging and labeling to confirm the ICM's visual inspection and ensure that the packaging of each item is undamaged, accurate, and complete and that no tampering of the packages has occurred. The inspection results will be recorded on the Shipping Checklist. Any incorrectly packaged, damaged, or noncompliant packages or labels will be corrected by a packaging employee. Any errors in the transport manifest will be corrected within the CCTT system by the ICM. Once the shipment has been inspected and approved by the ICM and QAM, it will be authorized for transport.

Transport Manifests

Every shipment sent from or received by the facility will be tracked in detail by an accompanying transport manifest. Prior to transferring cannabis to a transporting distributor, Bask Ventures, Inc. will generate a transport manifest within the CCTT system. The distributor will print four copies of each transport manifest the day of transport - two for the distributor's transport driver, one for the originating (shipping) facility and one for the destination facility (shipment recipient). The distributor will provide a copy of the transport manifest to the recipient upon delivery. Prior to accepting any cannabis, Bask Ventures, Inc. will require a transport manifest to be generated within the CCTT system and will receive a paper copy from the originating facility to check against the actual shipment.

Once the delivery is completed, paper transport manifests will be filed, and electronic copies from the CCTT system will be backed up along with any other documents associated with the shipment. Access to manifest records will be restricted to Bask Ventures, Inc.'s management team. Access will require two-person authorization. Filed transport manifest information will be mirrored in the point-of-sales records, allowing for quick identification and reconciliation of potential gaps during inventory and shipping audits. Every transport manifest will include [16 CCR § 5049]:

- Date of transport,
- Name of person transporting,
- Signature of person transporting,
- Make, model, license number of transport vehicle,
- License number, address, phone number, and name of originating facility;
- License number, address, phone number, and name of destination entity;
- Quantities by weight or unit of each type of cannabis or cannabis product contained in transport,
- Estimated date and time of departure,
- Estimated date and time of arrival,
- Route to be travelled,
- Details for extenuating circumstances (e.g., flat tire),
- Name of person receiving or rejecting product, and
- Signature of person receiving or rejecting product.

Delivery Diversion Prevention
The distributor is responsible for any discrepancies between the shipping manifest and the cannabis goods in its possession during transport, and subject to any enforcement or disciplinary action related to such discrepancy [16 CCR § 5314 (c) (2)].

Additional anti-diversion policies for transportation include:

- Transportation logs and manifests will be filled out by the ICM prior to an order leaving the cultivation facility.
- Shipping and receiving areas will be under constant video surveillance.
- Use of excellent hiring practices with thoroughly vetted employees.
- Use of tamper-evident product packaging and sealed tamper-evident shipping containers.

Sanitation Plan

Bask Ventures, Inc. has developed facility and worker sanitation standard operating procedures (SOPs) based on CalCannabis and Bureau of Cannabis Control ("State") regulatory guidelines in accordance with current good manufacturing practices (cGMPs) and sanitation principles to maintain an aseptic environment that ensures the safety and integrity of the cannabis plants being cultivated within and, ultimately, dispensed to the public. The Maintenance Manager and Cultivation Manager will be responsible for the proper implementation and maintenance of Bask Ventures, Inc.'s Sanitation Plan under the oversight of the General Manager (GM).

Cleaning and sanitation are a substantial part of Bask Ventures, Inc.'s IPM protocols for prevention of both plant and non-plant pests. Pest prevention standards require zero infestation and conformity with the mandatory pest management program, permitted mitigation techniques, and recordkeeping. Bask Ventures, Inc. will maintain good sanitary conditions to limit the potential for contaminants and pest outbreaks that may lead to contamination or adulteration of growing or harvested cannabis.

Sanitation and product handling audits may be carried out by inspectors from within the company or from an independent organization. Sanitation audits are based on criteria to ensure the highest standard of compliance with a specific emphasis on product handling. Cleaning activities in limited access areas will follow Bask Ventures, Inc.'s security protocols, including the supervision of staff at all times by an authorized manager while also under constant video surveillance.

Cultivation Facility Sanitation

Bask Ventures, Inc.'s facility sanitation SOPs include daily and weekly sanitation responsibilities for every position in the facility, including pest prevention, worker sanitation practices, and the proper removal of litter and waste. Various sanitation SOPs will detail processes for safely handling cannabis plants through every phase of growth and production. Bask Ventures, Inc.'s SOPs also include an inspection and maintenance schedule to ensure equipment, floors, counters, walls, and ceilings are kept in good repair. Bask Ventures, Inc. will contract with a professional cleaning company to deep clean the facility at least once a month.

Bask Ventures, Inc. is working with with Medicine Man Technologies (MMT) as their cultivation consultant to develop SOPs customized to the cultivation facility and environment based upon best practices utilized in their facilities since 2009. Sanitation procedures will address the unique aspects of sanitizing, inspecting, and maintaining equipment and surfaces that come into contact with cannabis. Sanitation forms and logs will detail the steps taken by internal staff to prevent contamination, clutter, infestation from insects, rodents, birds, or other pests, microbial or pathogenic outbreaks.

Facility Inspections

The opening manager will perform a daily walkthrough of the entire facility to look for potential safety and sanitation hazards. These inspections will include looking for burned out bulbs, damaged equipment, evidence of pests, and lack of cleanliness. Any concerns will be immediately corrected or scheduled to be corrected.

Bask Ventures, Inc.'s integrated pest management plan includes weekly exterior facility inspections conducted by the Maintenance Manager to identify potential habitats and food sources, gaps in doors or windows, inadequate screening, mowing, or other maintenance needed to prevent attracting rodents, insects and other pests.

Facility Design

The cultivation facility will be designed to reduce the risk of contamination using special construction materials, equipment selection, and environmental controls. Building materials used for internal surfaces, such as walls, floors and work surfaces, will be conducive to sanitation and maintenance.

Bask Ventures, Inc.'s facility design will ensure that:

- Interior/exterior room surfaces (walls, floors, and ceilings) are constructed of aluminum fiberglass reinforced paneling (e.g., NUDO or equivalent) and other antimicrobial materials that are resistant to high-moisture, impacts, and fire, and that are durable, smooth, free from cracks and holes, and won't shed particulate matter.
- Organic-surface materials (e.g., wood) for framing and walls will be limited to mitigate the risk of harboring pests and other pathogens, and to prevent deterioration under high moisture conditions.
- Interior work surfaces, including mechanical gear, tables, racks and fixtures, will be manufactured of aluminum or stainless steel which that will be easy to clean and maintain free of contaminants.
- STULZ Cyberone HVAC units (or similar suitable substitutes) for all plant work areas and vegetative, flowering, dry and cure rooms that will manage temperature, humidity, and CO2 levels to temper the rooms and create an exceptionally clean environment. The units are also capable of providing electrostatic and UVC filtration to further mitigate airborne pests and pathogens within the facility.
- Electrical pipe work, HVAC ducting, lighting fixtures, hoods, tables fixtures and ventilation points will be easy to clean and maintain in accordance with their manufacturer recommending schedules.

Water will be sourced from suppliers capable of providing safe, potable, and adequate volumes of to meet the facility's needs while adhering to applicable environmental regulations.

Supplemental Water Source Information

In compliance with 16 CCR § 5503, Bask Ventures, Inc. will provide the following information for each water source identified.

- For retail water supply sources, if the water source is a retail supplier, such as a municipal provider, as defined in § 13575 of the Water Code, Bask Ventures, Inc. will identify the retail water supplier. If the water source is a small retail supplier, such as a delivery service, and is subject to subdivision (a) (1) (B) of § 26060.1 of the Business and Professions Code, and if the contract is for delivery or pickup of water from a surface water body or an underground stream flowing in a known and definite channel, Bask Ventures, Inc. will provide the name of the contract water supplier; the geographic location coordinates in either latitude and longitude or the California Coordinate System of any point of diversion used by the contract water supplier to divert water delivered to

Bask Ventures, Inc. under the contract; the authorized place of use for any water right used by the contract water supplier to divert water delivered to Bask Ventures, Inc. under the contract; and the maximum amount of water delivered to Bask Ventures, Inc. for cannabis cultivation in any year.

- If the contract is for delivery or pickup of water from a groundwater well, Bask Ventures, Inc. will provide the name of the contract water supplier; the geographic location coordinates for any groundwater well used to supply water delivered to Bask Ventures, Inc., in either latitude and longitude or the California Coordinate System; the minimum amount of water delivered to Bask Ventures, Inc. for cannabis cultivation in any year; and a copy of the well log filed with the Department of Water Resources pursuant to § 13751 of the Water Code for each percolating groundwater well used to divert water delivered to Bask Ventures, Inc., if no well log is mailable, Bask Ventures, Inc. will provide evidence from the Department of Water Resources indicating that the Department of Water Resources does not have a record of the well log. When no well log is available, the State Water Resources Control Board may request additional information about the well.
- If the water source is a groundwater well, the groundwater well's geographic location coordinates in either latitude and longitude or the California Coordinate System and a copy of the well log filed with the Department of Water Resources pursuant to § 13751 of the Water Code. If no well log is available, Bask Ventures, Inc. will provide evidence from the Department of Water Resources indicating that the Department of Water Resources does not have a record of the well log. If no well log is available, the State Water Resources Control Board may request additional information about the well.
- If the water source is a rainwater catchment system Bask Ventures, Inc. will provide the total square footage of the catchment footprint area(s), the total storage capacity (in gallons) of the catchment system(s), and a detailed description of the type, nature, and location of each catchment surface. Examples of catchment surfaces include a rooftop and greenhouse.
- If the water source is a diversion from a waterbody Bask Ventures, Inc. will provide any applicable statement, application, permit, license, or small irrigation use registration identification number(s); and either a copy of any applicable registrations, permits, or licenses or proof of a pending application, issued under Part 2 (commencing with § 1200) of Division 2 of the Water Code as evidence of approval of a water diversion by the State Water Resources Control Board; a copy of any statements of diversion and use filed with the State Water Resources Control Board before October 31, 2017, detailing the water diversion and use; or a copy of documentation submitted to the State Water Resources Control Board before October 31, 2017, demonstrating that the diversion is authorized under a riparian right and that no diversion occurred in any calendar year between January 1, 2010, and January 1, 2017.

If Bask Ventures, Inc. claims an exception from the requirement to file a statement of diversion and use, Bask Ventures, Inc. will provide a copy of the documentation submitted to the State Water Resources Control Board before January 1, 2019, demonstrating that the diversion is subject to subdivision (a), (c), (d), or (e) of §5101 of the Water Code.

Plumbing will be of adequate size and design and will be adequately installed and maintained to carry sufficient quantities of water to required locations throughout the facility and will properly convey sewage and disposable liquid-waste away from the facility. Drains will be sized adequately and will have trapped gullies. There will be no cross-connections between the potable and wastewater lines. Readily accessible restrooms will be maintained for visitors and employees in a sanitary condition and in good repair.

Facility Layout

Defining clear production areas and delineating limited-access areas is important to keeping the facility clean, free from pests, and compliant with all applicable laws. Rows will be kept clear of obstructions for ease of egress in case of emergency. Adequate safety lighting will be installed in all areas where cannabis is stored and where utensils or equipment are cleaned. Sufficient space will be included for the placement of equipment and storage of materials to maintain sanitary conditions for cannabis cultivation. The Maintenance Manager and the Cultivation Team will ensure that spills and any debris are quickly cleaned to prevent slipping, injury, or dropping plants while in transport. Clutter will be removed from all access ways and corridors to prevent accidents.

Equipment Selection and Maintenance

All equipment will be maintained and sanitized in each operating unit at appropriate intervals to prevent malfunctions or contamination that would alter the safety, identity, strength, quality or purity of the finished cannabis. Bask Ventures, Inc. will maintain an Equipment Log for each piece of equipment. The Equipment Log will document equipment related events such as validation and qualification work, inspection results, calibrations, equipment cleaning, preventive maintenance and repairs, and unexpected events. Logs will contain the dates, times and employee ID number(s) for each recorded event. A master list of instruments and specific requirements will be kept in an Equipment Log binder, maintained onsite in hard copy form and backed up electronically.

Equipment will be inspected and maintained regularly per the manufacturer's instructions and schedule, including calibration of scales to ensure accuracy. Visual inspections will be conducted prior to and at the completion of any cultivation activities and maintenance, including cleaning and sanitizing. An overall equipment inspection schedule will be completed monthly by the Maintenance Manager in addition to the daily checks by cultivation agents.

Equipment selection will be based on the following:

- User-friendly;
- Easy to repair and maintain;
- Designed and installed in an area where it can be easily cleaned;
- Not reactive, additive or absorptive; and
- Calibrated at defined intervals.

Regular Maintenance

Cultivation agents will conduct daily inspections prior to commencing work and will maintain sanitary conditions throughout their shift, keeping surfaces free of debris and dust including any

dead or unusable plant parts from the cultivation areas. All equipment, floors, and counters will be sanitized daily. Work surfaces and any equipment that comes into contact with cannabis will also be cleaned after each use and between different harvest batches. The facility will use food-grade quality shelving, equipment, counters and surfaces. They will be designed and built of quality materials and workmanship. They will be adequately cleanable and will not react adversely with any used solvent. Cultivation agents will document their cleaning activities on cleaning logs as they are completed.

Cultivation rooms will receive a thorough deep cleaning of all tables, lights, racks, fixtures, walls, and ceilings and will be sterilized after each harvest to protect against contamination. Staff will also receive guidance on the use of sticky mats, hydrogen peroxide/isopropyl alcohol, dust traps, daily HVAC inspections, and ultraviolet light when entering and leaving cultivation rooms.

The cultivation facility will have a dedicated, locked room or closet for storage of toxic cleaning compounds, sanitizing agents, solvents, and chemicals. Employees will only use cleaning solutions registered with the United States Environmental Protection Agency (EPA) for use around vegetables, fruit, or medicinal plants in accordance with the instructions printed on the label. Refillable spray bottles used for cleaners or other fluids will be clearly labeled to indicate their contents to prevent misuse or accidental ingestion. Stored sanitizing and cleaning solutions, solvents and pesticide chemicals will be physically segregated from cultivation rooms to prevent contamination of cannabis. Containers will be stored with labels facing out and good FIFO protocols in place. Hard copies of the SDS for all hazardous chemicals to which employees may be exposed will be readily available in each chemical storage area in a designated SDS binder (please see Appendix C – SDS Binder). SDS sheets will also be available electronically. Employees will be required to read the SDS for every chemical they use.

The design of the facility will provide for proper storage or handling to accommodate solid waste loading and will allow for efficient and safe waste removal or collection [7 CCR § 17313]. All solid waste (every day refuse such as paper, cardboard, and other common materials) will be kept in solid waste receptacles located at various sites throughout the facility [7 CCR § 17315]. These waste receptacles will remain covered and emptied daily to minimize odors and reduce the potential for attracting pests by creating harborage or breeding grounds [7 CCR § 17312].

Worker Sanitation

Cannabis plants must be handled and stored in a manner that prevents the growth of pathogenic microorganisms or the formation of toxins. Every employee whose job entails contact with cannabis, including cultivation, production, and packaging, will conform to FDA cGMPs for food handlers in accordance with 21 CFR 110.10. In addition to receiving in-house training on sanitation SOPs, Bask Ventures, Inc. will require employees to complete a ServSafe® certification program from a certified instructor within the first 30 days of employment. ServSafe is a nationally recognized food safety training program that is mandated in several states for all employees engaged in the production of food items. The ServSafe program blends the latest FDA Food Code, food safety research and years of food sanitation training experience. Bask Ventures, Inc.'s employees and managers will learn to implement essential product handling practices and work in a culture that promotes product safety.

The ServSafe program can be customized for professionals in the cannabis industry and includes the following topics which relate to the cultivation and handling of cannabis:

- Maintaining adequate personal cleanliness.
- When and how to wash hands, including washing hands after meals, using the restroom, smoking cigarettes, using smokeless tobacco, touching bare human skin, or any other activity which may have soiled them.
- Proper use of single-use sanitary items, such as disposable sanitary gloves, hairnets, mouth covers, and how often to change said single-use items. Gloves will be made of an impermeable material for use in handling plant components, maintained in an intact, clean, and sanitary condition.
- Sanitization, including the proper use of sanitizer in a 3-compartment sink, sanitizing contact surfaces, and sanitization of utensils.
- The proper storage of ingredients, including keeping storage areas free of cleaners or other potential contaminants in close proximity to prep areas.
- Keeping prep areas free of employee food or beverages.
- Proper waste management practices, including the use of covered waste receptacles, daily removal of waste, and proper disposal methods.

Employees will not eat food, chew gum, drink beverages, or use tobacco products in cultivation or packaging areas, or where plant components, packaging components, or any contact surfaces are exposed or washed. Employees will also take other precautions necessary to protect plant components, packaging, cannabis, or contact surfaces from toxins, microorganism, or other extraneous materials including perspiration, hair, cosmetics, tobacco, chemicals, and medicines applied to the skin.

All employees will wear company-issued, disinfected uniforms (e.g. scrubs) in a manner that protects against the contamination of plant components, packaging, cannabis, or any contact surface. This will include the use of appropriate hairnets, caps, ear covers, or other effective hair restraints. Employees will remove all unsecured jewelry and other objects that might fall into cannabis, equipment, or packaging, and remove hand jewelry that cannot be adequately cleaned during periods in which these components are manipulated by hand. If hand jewelry cannot be removed, it must be covered by material that effectively protects against contamination.

Workers will wash their hands prior to starting work, prior to engaging in cultivation activities, and any time they contact a potential contaminant. The cultivation facility will be designed to provide easy access to sanitizing stations with cleaning agents. Adequate hand washing stations that supply nontoxic sanitizing cleaners and a sanitary towel service or suitable hand drying devices will be in convenient, clearly marked locations throughout the building. The water temperature at these stations will be at least 100°F, but will not exceed 110°F.

Additionally, any person who, by examination or supervisory observation, is shown to have, or appears to have, an illness, open lesion, including boils, sores, or infected wounds, or any other abnormal source of microbial contamination for whom there is a reasonable possibility of contact with cannabis will be excluded from any operations that may result in contamination until the condition is corrected.

Plant Handling Safety

While handling plants (including seeds, clones, mother plant genetics, vegetative and flowering plants) due to repotting, moving from one room to another, topping, pruning, feeding, harvesting, trimming, drying, curing or storage, all employees will wear appropriate uniforms and nitrile gloves. Employees will be required to wear scrubs and hair nets in addition to clean clothes and shoes. Shoes will be kept at work to further prevent outside contamination. Walking from one room to another will require either a change in uniform or an alcohol spray down to prevent cross contamination between crops. Access to contaminated areas will be strictly limited in the event of an outbreak.

Waste Disposal Management

The management of cannabis waste is imperative to maintaining facility compliance, preventing unlawful diversion, and ensuring the safety and security of the facility, its employees and the community. Bask Ventures, Inc. has created a destruction and disposal process in harmony with conscientious business practices, compliant with 3 CCR § 8108 and all applicable state and local laws and regulations.

There are several distinct types of waste that may be produced at Bask Ventures, Inc.'s cultivation facility - green waste, solid waste, liquid waste, and potentially hazardous waste such as cleaners or pesticides. Employees will be trained on the different waste streams and their proper disposal methods. This training will ensure that cannabis waste is not included with general rubbish, that nutrients and pesticides are disposed of according to California and federal regulations, and that employees know the difference between general and specific waste streams.

Bask Ventures, Inc. will ensure that the disposal of waste not including cannabis, such as hazardous waste and liquid waste, is performed in a manner consistent with applicable local, state, and federal laws. Non-hazardous, unusable and unrecognizable cannabis will either be composted on site, collected and processed by a local agency, waste hauler franchised or contracted by a local agency, or a private waste hauler permitted by a local agency, or self-hauled to [3 CCR § 8108]:

- A manned fully permitted solid waste landfill or transformation facility;
- A manned fully permitted composting facility or manned composting operation;
- A manned fully permitted in-vessel digestion facility or manned in-vessel digestion operation;
- A manned fully permitted transfer/processing facility or manned transfer/processing operation; or
- A manned fully permitted chip and grind operation or facility.

Bask Ventures, Inc. will keep and maintain documentation of each disposal event for at least seven (7) years from the date of record in accordance with [3 CCR § 8308]. Bask Ventures, Inc. will obtain all required permits, licenses, or other clearances and comply with all orders, laws, regulations, or other requirements of other regulatory agencies, including, but not limited to, local health agencies, regional water quality control boards, air quality management districts or air pollution control districts, local land use authorities, and fire authorities [3 CCR § 8308 (c)].

Solid Waste

Solid waste consists of everyday refuse such as paper, cardboard, and other common materials; solid waste management will be handled in accordance with Bask Ventures, Inc.'s Sanitation Plan. Solid waste receptacles will be located at various sites throughout the facility. These waste receptacles will remain covered and will be emptied daily to minimize odors and reduce the potential for attracting pests by creating harborage or breeding grounds. Bask Ventures, Inc. will deposit all garbage and putrescible matter or mixed garbage and rubbish in containers that are either non-absorbent, water-tight, vector-resistant, durable, easily cleanable, and designed for safe handling, or in paper or plastic bags having sufficient strength and water tightness that are designed for the containment of refuse. Containers for garbage and rubbish will be of an

adequate size and in sufficient numbers to contain without overflowing all the refuse that the facility generates within the designated removal period. Containers when filled will not exceed reasonable lifting weights for an average physically fit individual except where mechanical loading systems are used. Containers will be maintained in a clean, sound condition free from putrescible residue [7 CCR § 17315].

Pursuant to 30 PRC § 42649.2 (a), Bask Ventures, Inc. will arrange for recycling services for solid waste, consistent with state or local laws or requirements, including any local ordinance or agreement, applicable to the collection, handling, or recycling of solid waste, to the extent that these services are offered and reasonably available from a local service provider. As a commercial waste generator, Bask Ventures, Inc. will take at least one of the following actions:

- Source separate organic waste from other waste and subscribe to a basic level of organic waste recycling service that includes collection and recycling of organic waste.
- Recycle organic waste onsite or self-haul organic waste for recycling.
- Subscribe to an organic waste recycling service that may include mixed waste processing and specifically recycles organic waste.
- Arrange for recycling services in a manner that is consistent with state and local laws and requirements, including any local ordinance or local jurisdiction's franchise agreement, applicable to the collection, handling, or recycling of solid and organic waste.
- When arranging for gardening or landscaping services, the contract or work agreement between Bask Ventures, Inc. and a gardening or landscaping service will require that the organic waste generated by those services be managed in compliance with Bask Ventures, Inc.'s policy.
- If separate organic waste collection and recycling services are not offered through a local ordinance or local jurisdiction's franchise agreement, Bask Ventures, Inc. may arrange for separate organic waste collection and recycling services, until the local ordinance or local jurisdiction's franchise agreement includes organic waste recycling services.

Liquid Waste

Liquid waste and potentially hazardous waste often go together, and include expired nutrients, additives, pesticides, or cleaners. All liquid waste will be held in a designated area and will be handled and disposed of in accordance with applicable local, state, and federal laws. Bask Ventures, Inc. will follow controlled disposal procedures for potentially hazardous waste materials by contacting a contractor licensed within California for the handling and disposal of liquid and hazardous waste.

The disposal of runoff, wastewater or spent hydroponic nutrient solution generated by Bask Ventures, Inc. as a byproduct of cultivation will be accomplished using environmentally sound procedures consistent with Bask Ventures, Inc.'s State and Regional Water Resources Control Board-permitted water sourcing and waste discharge guidelines. Bask Ventures, Inc. will never dispose of anything in outside storm drains and will keep areas surrounding dumpsters free of waste and debris. The facility design will conserve water by collecting reusable grey-water and processing it through reverse osmosis. The processed water can then be used for equipment cleaning and general sanitation purposes. Over watering can also produce an inordinate amount of wastewater; Bask Ventures, Inc. will limit water spills by using timers when filling reservoirs and will water plants by hand.

Potentially Hazardous Wastes

According to 30 PRC § 40141, "Hazardous waste" means a waste, defined as a "hazardous waste" in accordance with § 25117 of the Health and Safety Code, or a combination of wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may do either of the following:

- Cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness.
- Pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported, or disposed of, or otherwise managed.

Toxic compounds, including hazardous waste and liquid waste, sanitizing agents, pesticides, fertilizers, nutrients, solvents, and other chemicals used in the production of cannabis will be identified, labeled, held, stored and disposed of in a manner that ensures employee safety and protects against contamination of cannabis. Disposal will be performed in accordance with product label directions and in compliance with any applicable local, state, and federal law, rule, regulation or ordinance. Bask Ventures, Inc. will also utilize EPA guidance regarding proper waste disposal under waste codes D001, F001-F005, U129, U136, P094, and 9123 as listed below.

Waste Code	Description	Disposal method
D001	IGNITABILITY Ignitable wastes are wastes that can readily catch fire and sustain combustion. Many paints, cleaners, and other industrial wastes pose such a fire hazard. Most ignitable wastes are liquid in physical form. EPA selected a flash point test as the method for determining whether a liquid waste is combustible enough to deserve regulation as hazardous. The flash point test determines the lowest temperature at which a chemical ignites when exposed to flame. Many wastes in solid or nonliquid physical form (e.g., wood, paper) can also readily catch fire and sustain combustion, but EPA did not intend to regulate most of these nonliquid materials as ignitable wastes. A nonliquid waste is only hazardous due to ignitability if it can spontaneously catch fire under normal handling conditions and can burn so vigorously that it creates a hazard. Certain compressed gases and chemicals called oxidizers can also be ignitable. Ignitable wastes carry the waste code D001 and are among the most common hazardous wastes. The regulations describing the characteristic of ignitability are codified at §261.21.	Waste cannot be disposed of unless treated to land disposal restrictions (LDR) treatment standards, disposed in no-migration unit, or subject to exemption or variance from treatment standards. D001 ignitable waste must be treated to treatment standard before disposal. There are special requirements for ignitable wastes placed in a surface impoundment, landfill, waste pile, and land treatment unit.
F001-F005	Spent solvent wastes (F001 - F005) The F list designates particular solid wastes from certain common industrial or manufacturing processes as hazardous. Because the processes producing these wastes can occur in different sectors of industry, the F list wastes are known as wastes from nonspecific sources. The F list is codified in the regulations at §261.31.	If solvents are used for cleaning in excess of amounts needed for that purpose, however, the excess solvent residues could be spent, and therefore listed hazardous waste. No set quantity has been established for excess amounts of solvents which would cause the residual in question to be subject to regulation. The nature of facility operations will dictate whether the amount of solvent released, inadvertently or

		deliberately, would cause the waste in question to meet the listing description. The applicability of such an interpretation would depend on the nature of the operation, the quantities of solvents used and disposed in the operation, and the manner in which they are used/disposed.
U129	Lindane - G-Well shampoo; Kwell shampoo	Applies to expired pharmaceuticals. Dispose of according to cannabis regulations
U136	HYDROXYDIMETHYL ARSINE OXIDE, n-Butyl alcohol (I)	Approved for land disposal as long as the concentration in the waste or treatment residual does not exceed 2.6 mg/kg.
P094	Phorate, Phosphorodithioic acid, O, O-diethyl S-[(ethylthio)methyl] ester	Do not reuse or refill container. Completely empty box into application equipment by shaking and tapping side s and bottom to loosen clinging particles. Offer for recycling if available or dispose of empty box in a sanitary landfill or by incineration. Do not burn, unless allowed by state and local ordinances. Do not place hands inside or near the open bottom of the box.
P123	Toxaphene	

Source: Hazardous Waste Identification 40 CFR Parts 261 https://www.epa.gov/sites/production/files/2015-09/documents/hwid05.pdf, http://www.gecap.org/pdf/hazardouswastecodes.pdf, https://yosemite.epa.gov/osw/rcra.nsf/ea6c50dc6214725285256bf00063269d/0603A5F4B66D48DA8525670F006BE703/$file/11638.pdf, https://www.cdc.gov/niosh/docs/81-123/pdfs/0076-rev.pdf

Chemicals that can safely be disposed of in the normal trash or sewer system will not be mixed with hazardous chemicals. Wastes will be stored in clearly labeled, secured collection drums until collection by the waste management company.

Labeling Wastes

Hazardous Waste containers will be labeled with a Hazardous Waste Chemical Discard Tag. The tag will be clearly visible and not obscure any previous notations written on the container. Each standard operating procedure (SOP) will include a full list of chemical ingredients in the waste material along with the generating process and date.

Each container of hazardous waste will be labeled in accordance with the regulations pertaining to labeling requirements for generators, and labels will remain on the container at all times while the hazardous waste is in the container and in the possession of Bask Ventures, Inc.. Each container will be labeled with the date that the container reaches the consolidation site. If individual containers are placed into a larger container, the required labeling information will also be placed on the outside of the larger container. If the hazardous waste is transferred to another container, the required labeling information will also be placed on the outside of the new container. The containers used to hold the hazardous waste at the remote site are labeled, in accordance with the regulations adopted by the State pertaining to labeling requirements for generators, as soon as the hazardous waste is placed in the container [20 HSC § 25110.10 (b)(6)].

Bask Ventures, Inc. will label any container used for the accumulation of hazardous waste with the initial date of accumulation and with the words "hazardous waste" or other words that identify the contents of the container [20 HSC § 25123.3 (d)(4)].

Hazardous Waste Disposal Training

All personnel handling hazardous waste at Bask Ventures, Inc.'s facility will complete health and safety training equivalent to the training required under § 5194 of Title 8 of the California Code of Regulations, prior to being assigned to handle hazardous waste.

All employees involved with handling hazardous wastes will be trained in safe handling, proper accumulation and storage procedures, emergency response procedures, and spill cleanup procedures. Bask Ventures, Inc. will train or require these employees to have prior sufficient education in safety techniques including the use of personal protective equipment (PPE), knowledge of potential hazards, use of spill kits, and appropriate emergency procedures. Before handling chemical wastes, employees will be completely familiar with and understand the associated SOPs for handling and disposal.

The General Manager (GM) will be responsible ensuring that all cultivation employees who work with chemical waste are educated in relevant safety issues and SOPs. Employee files will include a signed acknowledgement of understanding of related SOPs. The GM will also ensure work areas are adequately ventilated and necessary PPE is available. Bask Ventures, Inc. will consider implementing the following training courses as part of ongoing staff training and development:

- EGL Chemical Waste Disposal
- Chemical Hygiene Plan
- Proper utilization of safety data sheets (SDS) for each chemical handled

Bask Ventures, Inc. will provide employees with information and training on hazardous substances in their work area at the time of their initial assignment, and whenever a new hazard is introduced into their work area. Information and training may relate to general classes of hazardous substances to the extent appropriate and related to reasonably foreseeable exposures on the job [8 CCR § 5194 (h) (1)].

Information and training will consist of at least the following topics [8 CCR § 5194 (h) (2)]:

- Employees will be informed of the requirements of § 5194.
- Employees will be informed of any operations in their work area where hazardous substances are present.
- Employees will be informed of the location and availability of the written hazard communication program, including the list(s) of hazardous substances and required safety data sheets.
- Employees will be trained in the methods and observations that may be used to detect the presence or release of a hazardous substance in the work area (such as monitoring, the use of continuous monitoring devices, visual appearance or odor of hazardous substances when being released, etc.).
- Employees will be trained in the physical and health hazards of the substances in their work area(s), and the measures they can take to protect themselves from these hazards, including specific procedures put in place to protect employees from exposure to hazardous substances, like appropriate work practices, emergency procedures, and the use of personal protective equipment (PPE).

- Employees will be trained in the details of the hazard communication program developed by Bask Ventures, Inc., including an explanation of the labeling system and the safety data sheet, and how employees can obtain and use the appropriate hazard information.
- Bask Ventures, Inc. will inform employees of the right:
    - To personally receive information regarding hazardous substances to which they may be exposed, according to the provisions of this section;
    - For their physician or collective bargaining agent to receive information regarding hazardous substances to which the employee may be exposed according to provisions of this section;
    - Against discharge or other discrimination due to the employee's exercise of the rights afforded pursuant to the provisions of the Hazardous Substances Information and Training Act.
    - Whenever Bask Ventures, Inc. receives a new or revised Safety Data Sheet, the updated information will be provided to employees on a timely basis (not to exceed 30 days after receipt), if the new information indicates significantly increased risks to, or measures necessary to protect, employee health as compared to those stated on a safety data sheet previously provided.

Hazard Waste Disposal Equipment

PPE required in the cultivation facility may include protective clothing including a lab coat (or scrubs), nitrile gloves, safety glasses, spill kit, and hazardous waste drums provided by an independent waste management company. Employee exposure to OSHA-regulated substances will be limited to stay within permissible exposure limits.

Pouring hazardous wastes will occur in a well-ventilated area or under a fume hood. Wastes are to be collected and sorted by compatibility as specified in the SOP, as hazardous reactions can occur if incompatible waste types are mixed. Bask Ventures, Inc. will maintain a comprehensive database of all SDS in both hard copy and electronic scanned copies on site. Hard copies of the SDS for all hazardous chemicals to which employees may be exposed will be readily available in each chemical storage area in a designated SDS binder (please see Appendix C – SDS Binder). Employees will be required to read SDS for every chemical they use. Waste containers will be inspected prior to use and verified in good condition with a tightly fitting lid and no leaks. Waste containers will remain closed at all times except when actively receiving waste.

Management and Disposal of Green Waste

Bask Ventures, Inc. will collect, store, prepare, and transport non-hazardous green waste as required by the State of California. Employees will receive hands-on training regarding SOPs for handling and disposing of green waste, and appropriately logging those activities.

Green waste includes any cannabis waste generated through cultivation that is not the primary useable byproduct of the plant (i.e., flower, tight trim). Cannabis waste material, considered organic waste as defined in § 42649.8 (c) of the Public Resources Code, consists of: parts of the cannabis plant that are unused (stocks, stems, dry crispy or dead leaves, topping material, pruning material, etc.); flower batches and/or trim batches whose test samples have failed; returned, out-of-date, or recalled cannabis; and any plant debris including aged and dead plants, clones that don't take root, or unused plant parts, and roots.

Cannabis Waste Process Overview

If any cannabis plant or harvested flower at any stage within the cultivation process does not meet quality standards, is outdated, unauthorized, damaged, deteriorated, mislabeled, adulterated, recalled or whose container or package has been improperly or accidentally opened, it will not be offered for sale. The rejected cannabis will instead be destroyed or disposed of. The following procedures will be enforced by the GM:

1. Segregation. Location within facility designated for waste storage. Access will be limited to authorized personnel. Bask Ventures, Inc. will store green waste in a secured receptacle in its possession and under constant control.
2. Disposal by authorized personnel. Supervisory approval will be required on all cannabis waste and products designated for disposal. Segregated inventories will be clearly identified with a label that includes the signature of supervisory personnel and reads: "QUARANTINED PRODUCT - DO NOT USE OR SELL.".
3. Render substance unusable. Clear description of waste-handling procedures including protocols for rendering the substance unusable prior to disposal. This will include mixing waste with non-consumable solid-wastes so that the resulting mixture is at least 50% non-cannabis waste.
4. Documentation of disposal in the California Cannabis Track and Trace (CCTT) system. Supervisory sign-off will include verification that waste has been properly entered.
5. Location of final disposal. Identification of solid waste site/disposal facility or if allowable, where final composted material is located.

Segregation and Storage of Waste Material

Waste materials generated by cultivation operations will be collected in each department throughout the day (e.g., harvest, trimming, curing, etc.). After properly weighing and recording details of the waste material on the Waste Disposal Log, it will be placed in the dedicated waste disposal area. The supervisor who will oversee the final disposal will weigh the waste materials a second time and confirm the recorded weight matches the amount documented on the Waste Disposal Log before approving the final disposal.

Green waste will be stored in designated secure receptacles with two locks - one for the waste management company and one for the facility [3 CCR § 8308 (d)]. Green waste receptacles will remain under Bask Ventures, Inc.'s control until their contents are transferred to an approved hauler or disposal facility. Bask Ventures, Inc. will construct and maintain fencing on the premises to prevent unauthorized entry or access to waste disposal containers or disposal limited access areas located outside of its facility. Within the cultivation facility there will be a separate locked area dedicated to the storage and disposal of cannabis waste.

The dedicated waste storage room will be consistently maintained in a clean and orderly fashion and deep cleaned weekly. Walls, floors, tables and racks will be sanitized and disinfected to prevent contamination and infestation from insects, rodents, birds and other pests. This room will be equipped with electronic locks that ensure only authorized employees can enter a room and automatically re-lock on use. Security cameras will cover the exterior and interior of the room at a minimum of two juncture points and will capture video on monitors recording 24 hours a day.

Disposal Personnel and Surveillance Guidelines

Destruction and disposal of green waste will be performed in a designated limited-access destruction area in the cultivation facility. Bask Ventures, Inc. will send a notification to the State via the CCTT system prior to rendering the cannabis unusable. At the end of day an authorized employee will unlock and move all green waste to the destruction area before close of business hours.

All steps taken to render the cannabis unusable will be conducted under video surveillance and recorded from the time the destruction begins to when the rendered material is placed in a locked dumpster or other approved, locked container for removal from the facility. Only authorized employees will be permitted to be present and carry out the disposal process. A list of authorized personnel will be posted in the waste holding area and available to the State upon request.

Rendering Waste Unusable

Cannabis plant waste will be made unusable and unrecognizable prior to leaving the cultivation facility, eradicating THC, CBD, and other cannabinoids, leaving it devoid of any psychoactive elements. Pursuant to [16 CCR § 5054], green waste will be removed from its packaging and rendered unusable by placing it with either compostable or non-compostable mixed waste into a wood chipper or grinder so that the resulting mixture is at least 50% non-cannabis waste by volume:

- Compostable mixed waste –when the waste is to be disposed of as compost, feedstock, or any other kind of organic waste method
    - Food waste
    - Yard waste
    - Vegetable based grease oils
    - Agricultural materials
    - Biodegradable products and paper
    - Clean wood
    - Fruits and vegetables
    - Plant matter.
- Non-compostable mixed waste – when the waste is to be disposed of in a landfill or another disposal method such as incineration
    - Paper waste
    - Cardboard waste
    - Plastic waste
    - Soil
    - Nonrecyclable plastic
    - Broken glass

Waste Disposal Tracking

Bask Ventures, Inc. will use the California Cannabis Track and Trace (CCTT) system and required documentation to ensure cannabis waste is identified, weighed, and tracked while on the licensed premises and during disposal [3 CCR § 8108 (i)]. All disposal activities will be recorded in the CCTT system and on manual logs to maintain accurate and comprehensive records regarding waste material that accounts for and reconciles all activity related to the disposal of cannabis.

Bask Ventures, Inc. will utilize digital scales certified legal for trade by the Department of Agriculture and manual logs as cultivation activities are completed, to ensure its post-harvest waste materials are properly identified, weighed, and tracked before they are designated for disposal.

During pruning, employee will utilize certified digital scales to calculate the entire weight of removed cannabis product from the plant; this amount is then recorded on the Waste Disposal Log. The digital scale will register in the CCTT system, providing an immediate result to compare against the weight logged manually.

During harvest, the mature cannabis plant will first be weighed by a certified digital scale and the total weight recorded in the Harvest Tracking Log. Once the flower has been separated from the trim and waste plant materials, each will be weighed and recorded independently. The difference of the total weight minus the flower weight (wet) minus the trim weight will be calculated and that weight will be recorded in the log and the CCTT system. The post-harvest waste material will be moved to Bask Ventures, Inc.'s designated waste destruction area and moved to the associated virtual quarantine room in the CCTT system before disposal.

Inventory adjustments will be made by utilizing the Inventory Adjustment Log to record miscellaneous changes in the inventory due to waste including removal of stems and contaminated product (dropped on floor, soiled, etc.).

Final Disposal and Documentation

Green waste that is rendered unusable will be discarded into a locked container for delivery from the facility to a state approved waste facility. The GM will be responsible for maintaining any waste management company contracts, monitoring individual deliveries by validating waste disposal agent credentials, and ensuring all final documentation of the waste pick up is entered in the CCTT system.

If Bask Ventures, Inc. uses a local agency, a waste hauler franchised or contracted by a local agency, or a private waste hauler permitted by a local agency to collect and process cannabis waste, Bask Ventures, Inc. will [3 CCR § 8308]:

- Provide the department with the following information for the local agency, a waste hauler franchised or contracted by the local agency, or private waste hauler permitted by the local agency who will collect and process the licensee's cannabis waste;
    - Name of local agency providing waste hauling services, if applicable;
    - Company name of the waste hauler franchised or contracted by a local agency or private waste hauler permitted by the local agency, if applicable;
    - Local agency or company business address; and
    - Name of the primary contact person at the local agency or company and contact person's phone number;
- Obtain and retain documentation from the local agency, the waste hauler franchised or contracted by a local agency, or private waste hauler permitted by the local agency that indicates the date and time of each collection of cannabis waste at the licensed premises;

- Obtain and retain a copy of the certified weight ticket, or other documentation prepared by the local agency, the waste hauler franchised or contracted by a local agency, or private waste hauler permitted by the local agency evidencing receipt of the cannabis waste at one or more of the solid waste facilities mentioned above [3 CCR § 8108 (c)].

If Bask Ventures, Inc. is self-hauling cannabis waste to one or more of the solid waste facilities mentioned above, Bask Ventures, Inc. will obtain and retain, for each delivery of cannabis waste, a copy of a certified weight ticket, or receipt documenting delivery, prepared by a representative(s) of the solid waste facility receiving the self-hauled cannabis waste. Transportation of self-hauled cannabis waste will only be performed by Bask Ventures, Inc. or its employees [3 CCR § 8108 (h)].

Waste Disposal Records
Bask Ventures, Inc. will maintain accurate and comprehensive records regarding cannabis waste that account for, reconcile, and evidence all activity related to the generation or disposition of cannabis waste. Records are subject to inspection by the State and will be kept for a minimum of seven (7) years pursuant to section § 8400 [3 CCR § 8108 (j)]. A separate written record will be created on the Waste Disposal Log and entered into the CCTT system every time the disposal process happens. This log will include:

- The date and time of the disposal,
- The manner of the disposal,
- The volume and weight of the approved solid waste media used to render the cannabis unusable,
- The batch number(s) associated with the cannabis scheduled for destruction,
- The reasoning for and description of the disposal, and
- The signature of the authorized employee(s) overseeing the disposal of the cannabis.

Workplace Safety and Emergency Response

Prior to operational startup, Bask Ventures, Inc.'s General Manager (GM) and Security Manager will work with their selected professional security vendor(s) to develop a Workplace Safety & Emergency Response Plan as part of a comprehensive security strategy. Under this plan, security experts will provide management and employees with a Workplace Safety Manual that will be used for training purposes. The Security Manager will be responsible for training staff regarding safety and emergency protocols and for planning scheduled safety inspections by local regulatory authorities. The Quality Assurance Manager will maintain detailed records of inspection results and address resulting health and safety concerns with management and staff. Ultimately, the General Manager will be responsible for the security of the premises, with the majority of day-to-day responsibilities falling to the Security Manager under their direct oversight.

The following safety issues will be covered during training:

- **Security** - Staff will understand their respective security roles and responsibilities including the chain-of-command, especially in the event of a security breach. Employees at all levels will be trained by the GM & Security Manager to identify threats and vulnerabilities, devise mitigating strategies and contingency plans; when and why they could be targets of threats, and how to respond accordingly. Staff will be tested periodically regarding their knowledge of the cultivation facility's security strategies and how to utilize them. Development of security policies and procedures will be on-going. Bask Ventures, Inc. will determine critical control points where security knowledge will be required for handling marijuana plants, inventory, chemicals, cash, visitors, etc.
- **Medical Emergencies** - Staff will learn how to recognize and respond to medical emergencies for an illness or injury requiring urgent medical attention. Training will include when to call 911, location of medical kits, lockdown of the facility and escort of emergency first responders. If trained properly and certified, certain staff may give appropriate first aid until emergency responders arrive. Any injury at the cultivation facility will be documented in an Incident Report.
- **Fires** - Staff will learn Bask Ventures, Inc.'s fire plans including the location, use, and maintenance of firefighting equipment. Plans will comprise schedules for periodic fire drills, when to call 911, the need to account for all staff, the escort of fire department and other emergency personnel, the role of the on-scene commander, and expected response times by nearest fire, ambulance, and police departments. Signs will be posted throughout the facility with graphic floor plans indicating at least two ways to escape the building from every room.
- **Chemical spills** - Staff will be trained to recognize the danger signs of a chemical spill or release, such as the presence of fumes, odors, or smoke. Staff will also learn to recognize the physical symptoms of being exposed to toxins, including headaches, dizziness, distress, fainting, skin rash, and blurred vision. Staff will know when to notify management, call 911, coordinate with first-responders and secure the area. Knowing how to handle chemicals and how to react during an emergency can reduce the risk of injury.
    - A Safety Data Sheet (SDS, formerly a Material Safety Data Sheet, or MSDS) is a form containing data regarding the properties of a particular substance. An SDS is intended to provide workers and emergency personnel with procedures for handling or working with a substance in a safe manner and includes information

such as physical characteristics, storage, disposal, required protective equipment, and spill handling procedures. SDS can be obtained from the product manufacturer, with most able to be downloaded from the web.

- **Threatening Events** - Violence in the workplace can originate from both within and outside an organization. Violent behavior may come from someone as a random, spontaneous act, or as part of a premeditated plan. Since the cultivation facility handles a controlled substance it may be a target for armed robbery, burglary, or other criminal incidents.
- **Training** - The GM and Security Manager will train staff on how to address potentially violent incidents such as hostage situations, shootings, or bomb threats, and other dangerous situations like strong storms or other natural disasters. Security training will also cover transportation, communication, and information security including how and when to fill out an incident report form.
- **Testing** - Staff will be given periodic tests to demonstrate their security knowledge.
- **Inspection** - The Security Manager will follow an inspection schedule to monitor threats and vulnerabilities.
- **Recordkeeping** - The GM and Security Manager will keep records of any potential threats or vulnerabilities utilizing Bask Ventures, Inc.'s Suspicious Activity Reporting System..

Worker Safety Standards

Employee and public safety is one of Bask Ventures, Inc.'s foremost business considerations. Every attempt will be made to prevent accidents from occurring while conducting business. Bask Ventures, Inc.'s safety and sanitation SOPs address both Occupational Safety and Health Administration (OSHA) regulations and good agricultural/manufacturing practices. Key cultivation personnel will be required to participate in OSHA Certification in Health and Safety educational classes. All employees will be fully trained in the safe and efficient use of the chemicals, tools, and machinery relevant to their position at the facility.

Bask Ventures, Inc. will train all cultivation employees on personal worker safety standards, including pesticide application training covering personal protective equipment and application guidelines, and using SDS sheets for all substances (please see Bask Ventures, Inc.'s IPM plan for detailed pesticide worker safety policies and procedures). In addition to the training provided by the pesticide applicator program from the Department of Agriculture and/or local County Agricultural Commissioner, cultivation employees will receive in-person training from Bask Ventures, Inc.'s Cultivation Manager on all SOPs they may perform.

Chemical Handling Safety

Safety data sheets (SDS), material safety data sheets (MSDS), and product safety data sheets (PSDS) are an important component of product stewardship and occupational safety and health. They are intended to provide workers and emergency personnel with procedures for handling or working with that substance in a safe manner, and include information such as physical data (melting point, boiling point, flash point, etc.), toxicity, health effects, reactivity, storage, disposal, protective equipment, first aid, and spill-handling procedures. Bask Ventures, Inc. SOPs for chemical receiving, tracking, use, storage, and disposal will include references to relevant SDS applicable to that specific process. Bask Ventures, Inc. will maintain a

comprehensive database of all SDS in both hard copy and electronic scanned copies on site. Hard copies of the SDS for all hazardous chemicals to which employees may be exposed will be readily available in each chemical storage area in a designated SDS binder (please see Appendix C – SDS Binder). Employees will be required to read the SDS for every chemical they use. The Quality Assurance Manager will be responsible for obtaining all safety data sheets from manufacturers and maintaining the SDS binder.

Employees will be trained on the proper use of SDS as part of their orientation process and in specific training provided by their supervisor in the performance of their duties. OSHA has published a brief describing the "Hazard Communication Standard: Safety Data Sheets" that covers the handling and storage of chemicals and outlines the type of information that will be included in the SDS for a chemical. This brief will be provided to all employees during training to familiarize them with the format and contents of an SDS.

Personal Protective Equipment (PPE)

Cultivation employees will be provided appropriate PPE and training in the proper storage, inspection, and maintenance of their PPE (see Bask Ventures, Inc.'s IPM plan for details on PPE policies and procedures). Employees will take the necessary precautions to protect themselves and will be trained in decontamination procedures. Bask Ventures, Inc.'s PPE program will be consistent with OHSA and EPA standards and will address:

- Hazards present;
- Selection, maintenance, and use of PPE;
- Training; and
- Monitoring.

Standard PPE required for all cultivation employees includes uniforms with some level of fire resistance, chemical resistant gloves, boots with water resistance and slip protection, N-95 or P-100 disposable respirators, a full-face air-purifying respirator with a minimum P-100 filter, fitted by a qualified professional, for employees with beards or performing substance spray applications, and Tyvek coveralls for employees performing substance spray applications.

Respiratory Protection Program

The Cultivation Manager will be responsible for using the Certification of PPE Hazard Assessment to outline work areas and job classifications for which respirators are required, and the types of respirators required. It will be company policy that all employees working in areas or job classifications requiring the use of tight-fitting respirators undergo medical evaluation and fit testing before assignment. Bask Ventures, Inc. will train these employees on program requirements and provide specific instruction on the proper use, maintenance, and limitations of respirators. Respirators will not be used in a manner inconsistent with their National Institute of Occupational Safety and Health (NIOSH) certification or manufacturer's instructions.

Detecting Unauthorized Entry

Bask Ventures, Inc.'s selected security vendor(s) will install, monitor, and maintain the facility's security alarm and video surveillance systems as required by [BPC § 7590.1(n)]. This alarm system will detect movement in all required areas within the facility when the premises are vacant. The system will detect unauthorized entry at all ingress and egress points (including roof

hatches), and all exterior windows (including skylights) using passive infrared (or other remote) motion detectors placed throughout the facility.

Video surveillance cameras will be installed in all limited access areas (all rooms containing medical marijuana, storage, security equipment room, etc.), all entrances and exits to the facility including exterior windows, and any area in the facility where employees interact with medical marijuana plants or products. The alarm system will be programmed to notify the security vendor, the GM, and Security Manager, or their authorized assignee, in the event of a breach. If unavailable, law enforcement will be contacted and dispatched as necessary.

Alarm System
Bask Ventures, Inc. will maintain an alarm system at the facility. Upon request, Bask Ventures, Inc. will make available to the Bureau of Cannabis Control and CalCannabis ("the State") all information related to the alarm system, monitoring, and alarm activity pursuant to 16 CCR § 5047. The facility's alarm system will be equipped with an automatic voice dialer that will generate a prerecorded message to alert the authorities via email, phone, text, or a combination of those methods in the event of a facility security breach, employee alarm activation, or alarm system failure, including, but not limited to, power outage, loss of supervision, or connectivity issues.

Video Surveillance System
Bask Ventures, Inc. will have a video surveillance system that, at a minimum, consists of digital or network video recorders, cameras capable of meeting the recording requirements outlined by the State, video monitors, digital archiving devices, and a color printer capable of delivering still photos [16 CCR § 5044]. The system will have minimum camera resolution of 1280 x 720 pixels. The surveillance-system storage device or the cameras will be transmission control protocol (TCP) capable of being accessed through the Internet. Each camera will be permanently mounted and in a fixed location. Each camera will be placed in a location that allows the camera to clearly record activity occurring within 20 feet of all points of entry and exit on the licensed premises and allows for the clear and certain identification of any person and activities in all areas required to be filmed under § 5044 subsection (e). The video surveillance system will be equipped with a failure notification system that provides notification to Bask Ventures, Inc. of any interruption or failure of the video surveillance system or video surveillance system storage device. Bask Ventures, Inc. will ensure that the video surveillance system does all of the following:

- Records at a minimum the following areas [16 CCR § 5044]:
    - Any areas where marijuana products are weighed, packed, stored, loaded, and unloaded for transportation, prepared, or moved within the facility.
    - Limited access areas and security rooms. Transfers between rooms must be recorded.
    - Areas storing a surveillance system storage device with at least one camera recording the access points to the secured surveillance recording area.
    - The entrances and exists to the building must be recorded from both indoor and outdoor vantage points.
- Effectively and efficiently records images of the area under surveillance with sufficient resolution 24 hours a day at a minimum of 15 frames per second (FPS).

Bask Ventures, Inc. will have cameras that record continuously 24 hours per day and recorded images will clearly and accurately display the time and date. Bask Ventures, Inc. will install each camera so that it is permanently mounted and in a fixed location. Each camera must be placed in a location that allows the camera to clearly record activity occurring within 20 feet of all points of entry and exit on the facility and allows for the clear and certain identification of any person, including facial features, and activities, including sales or transfers, in all areas required to be recorded under 16 CCR § 5044.

Bask Ventures, Inc. will secure the physical media or storage device on which surveillance recordings are stored in a manner to protect the recording from tampering or theft. Bask Ventures, Inc. will keep surveillance recordings for a minimum of 90 days, except for in instances of investigation or inspection by the State through its investigators, agents, auditors, or the state police, in which case Bask Ventures, Inc. will retain the recordings until such time as the State notifies the licensee that the recordings may be destroyed, and will be kept in a manner that allows the Bureau to view and obtain copies of the recordings at the facility immediately upon request. Bask Ventures, Inc. will also send or otherwise provide copies of the recordings to the State upon request within the time specified by the State [16 CCR § 5044 (j)].

Bask Ventures, Inc. will retain a record of all inspections, servicing, alterations, or upgrades to the security systems. A current list of employees authorized to access the security records will be maintained onsite. A dedicated log will be kept specifically for video surveillance records which includes:

- Current list of employees authorized to access surveillance records,
- The identities of the employee or employees responsible for monitoring the video surveillance system,
- The identity of the employee who removed the recording from the video surveillance system storage device and the time and date removed,
- The identity of the employee who destroyed any recording, and
- A maintenance log which includes:
    - Date/time,
    - Name, and
    - Reason for service.

System Backup

The facility's alarm system will be equipped with a failure notification that will provide an email, phone call, or text within five minutes of any failure in the surveillance system. An uninterrupted power supply (e.g., backup battery) will be installed to allow the alarm system and cameras to remain active in the event of a power outage for a minimum of 48 hours.

Emergency Response

Bask Ventures, Inc. has created emergency notification procedures with their selected security vendor(s), integrating SOPs for employee conduct and the utilization of physical alarms within the facility, ensuring timely communication with the State, law enforcement, and emergency response professionals. The Security Manager will ensure all equipment is kept in good working order and will have the system inspected by Bask Ventures, Inc.'s selected security vendor at

least once a year. The security vendor will repair or replace any failed video surveillance component within 24 hours.

Facility Security and Crime Prevention

All employees will attend a mandatory security and safety training program regarding personal safety and crime prevention techniques to prevent diversion. The training will reinforce company SOPs and establish a uniform response to armed robbery, invasion, burglary, or any other criminal incident, providing the safest possible environment for responding officers and involved citizens. Training may include:

- Evaluation of the facility and areas that may be vulnerable to attack;
- Evaluation of suspicious persons, vehicles, or packages;
- Locations of the Emergency Alert System and other media devices;
- Location of the silent alarms or the portable buttons to notify local law enforcement that a robbery is in progress or that there is the need for police presence;
- Dispatcher communication;
- Logs and information forms that would be helpful to emergency responders;
- Process of informing staff to stop all activities to avoid activating a bomb;
- A map of the pre-determined safe location away from the facility;
- Several copies of the floor plan to assist emergency personnel;
- Understanding the potential of a community-wide threat;
- How to handle potentially false alarms; and
- Documentation of incidents.

Employees will be trained to observe the premises for suspicious persons or activity prior to entering the facility. The opening facility manager (MOD) will perform a complete daily walkthrough of the facility looking for potential safety hazards. These inspections will include looking for burned out bulbs, damaged equipment, lack of cleanliness, evidence of pests, and more. Any concerns observed will be immediately corrected (when possible) or scheduled to be corrected.

If any suspicious activity is noted, the observing MOD will immediately notify on-duty security personnel of the potential threat prior to approaching the facility. If the person or activity is deemed to be a threat, security will notify local law enforcement. As soon the potential threat has been mitigated, the opening MOD will enter the facility and record the event in an Incident Report (see Suspicious Activity Reporting System below).

Security training for employees will include procedures for facility inspections at the end of each day. This inspection will include a walkthrough of each room to check for visible security risks including inoperative security lighting, damaged or inoperative security equipment, or unauthorized persons in the facility.

Employees responsible for closing the facility will be trained to view the exterior surveillance monitor to ensure there are no observable security threats before leaving the building, such as suspicious person or activities near the licensed premises. Closing procedures will also include a final exterior walkaround to confirm all entrances and exits are securely locked.

Employee Alarm Procedures

Bask Ventures, Inc. will establish an employee alarm system that comports with the regulations as stated in 7 CCR § 6184, Article 165. The employee alarm system will provide warning for necessary emergency action as called for in the emergency action plan, or for reaction time for safe escape of employees from the workplace or the immediate work area, or both. The employee alarm will be capable of being perceived above ambient noise or light levels by all employees in the affected portions of the cultivation facility. Tactile devices may be used to alert those employees who would not otherwise be able to recognize the audible or visual alarm. The employee alarm will be distinctive and recognizable as a signal to evacuate the work area or to perform actions designated under the emergency action plan.

All employees will be made aware of means and methods of reporting emergencies. These methods may be, but are not limited to, manual pull box alarms, public address systems, radio or telephones. When telephones are used as a means of reporting an emergency, telephone numbers will be conspicuously posted nearby. Where a communication system also serves as the employee alarm system, all emergency messages will have priority over all non-emergency messages.

Bask Ventures, Inc. will establish procedures for sounding emergency alarms in the workplace. Employees who are required to operate the security system will be trained to activate and deactivate the alarm and how to respond to burglary, fire, or other emergency that is indicated by the security alarm system. If the employee alarm system is used for alerting fire brigade members, or for other purposes, a distinctive signal for each purpose will be used. Bask Ventures, Inc. will establish in the emergency action plan the types of evacuation to be used in emergency circumstances.

Once trained, employees that are required to interface with the alarm system will be issued a unique control panel code that will identify any actions performed in the system by the employee. Training of all employees will include the "All-Clear" and "Distress" codes assigned to the facility by the security alarm monitoring company, and the appropriate use of each code in the event of an actual or false alarm.

The closing MOD will arm the alarm system as the last person of the day is leaving. The system will be set up to notify the GM and Security Manager if the alarm is not armed after a specific time and will be capable of remote arming. The system will also be programmed to arm automatically at a certain time if the alarm is not armed upon exiting the facility or by the specified time.

Bask Ventures, Inc. will conduct regular security and safety drills to ensure that employees know the correct action to take in various situations. Drills will train facility employees to protect themselves and to also observe and review the security procedures for limitations that can be improved by modifications to security systems, altering response plans, or improving employee awareness of protocols.

Throughout the business day, a minimum of two employees will be present in the facility, especially during opening and closing procedures. Additionally, Bask Ventures, Inc.'s security

vendor(s) will monitor the licensed premises 24 hours a day, at both occupied and unoccupied times.

Suspicious Activity Reporting System

The suspicious activity reporting system will compile a record of events, witnessed by employees or recorded on the security and surveillance system, so that a chain of events leading to possible break-ins or internal theft may be identified. An "incident" may be anything substantially out of the ordinary or suspicious that occurs during or after normal business hours. An attempted burglary or break-in, the presence of unauthorized individuals, or an employee injury are all examples of noteworthy incidents that should be documented. Serious incidents associated with theft or loss will be reported to the State and law enforcement agencies within three (3) business days pursuant to [3 CCR § 8409]. Incident Report forms (please see Appendix A – Logs and Forms) will include the following and be provided along with relevant video surveillance footage upon request:

- Witness name, contact information, and signature;
- Incident date, time, and location;
- Person(s) involved in incident;
- Witness description of incident; and
- If incident involved or was reported to authorities, date of report and agency contact information including name(s) of agency employees.

Emergency Action Plan

An emergency is a sudden unforeseen crisis, usually involving danger, which calls for immediate action. It is a situation that can directly or indirectly affect a single employee, an entire workplace, or impact a whole community. Emergencies can happen before, during or after work hours and be caused by a range of events and hazards involving both nature and people.

California law defines "disaster" as fire, flood, storm, tidal wave, earthquake, or similar public calamity, when the Governor through an executive order has declared a state of emergency, whether or not it resulted from natural causes. The California Emergency Management Agency (CalEMA) works with local agencies to help businesses prepare for natural and man-made disasters. They help with continuity planning, and with disaster recovery. Under the California Emergency Services Act, the governor may proclaim a state of emergency or state of war emergency and make, amend, or rescind orders and regulations as necessary to prevent or mitigate harm and damage [2 CCR § 8550].

The Governor's Office of Emergency Services (OES) offers information on handling natural disasters, including earthquakes, inundations (floods and tsunamis), storms, wildfires, and quarantines, as well as man-made disasters such as nuclear power plant incidents and hazardous materials spills.

The California Department of Forestry and Fire Protection responds to wildfires, earthquakes, hazardous material spills, and other incidents, including arson, that could result in fires and/or evacuation, and helps businesses with fire prevention and fire response planning.

California law requires that a company have a written emergency action plan for fire and other emergencies (8 CLC §3220). Accordingly, the emergency action plan will be in writing and will cover the designated actions Bask Ventures, Inc. and its employees must take to ensure employee safety from fire and other emergencies. Bask Ventures, Inc.'s Emergency Response Plan will contain the following elements:

- Procedures for emergency evacuation, including type of evacuation and exit route assignments;
- Procedures to be followed by employees who remain to operate critical facility operations before they evacuate;
- Procedures to account for all employees after emergency evacuation has been completed;
- Procedures to be followed by employees performing rescue or medical duties;
- The preferred means of reporting fires and other emergencies; and
- Names or regular job titles of persons or departments who can be contacted for further information or explanation of duties under the plan.

Before implementing the emergency action plan, Bask Ventures, Inc. will designate and train a sufficient number of persons to assist in the safe and orderly emergency evacuation of employees. Bask Ventures, Inc. will advise each employee of his/her responsibility under the plan at the following times:

- Initially when the plan is developed,
- Whenever the employee's responsibilities or designated actions under the plan change, and
- Whenever the plan is changed.

Bask Ventures, Inc. will review with each employee upon initial assignment those parts of the plan that the employee must know to protect themselves in the event of an emergency. The written plan will be kept at the cultivation facility and will be made available for employee review. Emergencies can include:

- Natural disasters (e.g., earthquakes, floods),
- Extreme weather (e.g., storms, heat),
- Fires (building fires, wildfires),
- Chemical or hazardous material spills or releases,
- Major transportation or vehicle accidents (involving trucks, buses, cars, forklifts, etc.),
- Incidents of violence,
- Bomb threats,
- Medical emergencies,
- Employee deaths (suicide, homicide, unintentional or natural),
- Acts of terror, and
- Outbreaks of disease or infections (e.g., H1N1 virus).

Bask Ventures, Inc. will form an emergency committee and identify those who will be involved in developing the emergency response plan. Each department in the cultivation facility will be represented by employees and management on the committee. The plan will address state and local safety laws and will comply with governmental agency regulations.

The Cal/OSHA Emergency Action Plan standard (8 CCR § 3220) sets minimum requirements for what the Plan should include when a workplace has an emergency action plan.
Bask Ventures, Inc.'s Emergency Action Plans will also include the following elements:

- Procedures for reporting a fire or other emergency
- Procedures for emergency evacuation, including the types of evacuation and exit route assignments
- Procedures to be followed by employees who remain to operate critical operations before they evacuate
- Procedures to account for all employees after evacuation
- Procedures to be followed by employees performing rescue or medical duties

Bask Ventures, Inc. will review the emergency action plan with each employee covered by the plan when the plan is first developed or the employee is assigned initially to a job, when the employee's responsibilities under the plan change, and when the plan is changed. Bask Ventures, Inc. will take the time to develop a complete, comprehensive plan and will review it at least once a year. Bask Ventures, Inc. will partner with emergency responders such as fire fighters and work with organizations such as the American Red Cross. Bask Ventures, Inc. will also develop a process for evaluating the effectiveness of a response after an incident occurs.

Diversion Prevention

Cannabis businesses have a crucial responsibility to eliminate opportunities for the diversion of cannabis flower and products to unauthorized recipients. Bask Ventures, Inc. has developed and will implement diversion prevention policies that are based on CalCannabis, the Bureau of Cannabis Control, the Manufactured Cannabis Safety Branch ("the State") regulations and industry best practices. Using lessons learned from real-world situations and ineffective strategies that have failed other businesses, Bask Ventures, Inc. will avoid repeating other's mistakes.

To be effective, counter-diversion strategies must be two-pronged: internal and external. Internal counter-diversion will consist of safeguards within the facility itself and within standard operational procedures (SOPs) to prevent diversion of cannabis and cannabis products by persons within the company such as employees, contractors, contracted security or transport personnel, visitors, or vendors. External diversion strategies minimize the risk of cannabis or cannabis products being removed or otherwise diverted by focusing on threats from persons not employed or contracted by the company. Bask Ventures, Inc.'s counter-diversion strategy is broken into three parts: general rules, internal counter-diversion strategy, and external counter-diversion strategy.

General Rules
All employees and visitors will adhere to Bask Ventures, Inc.'s general rules, regardless of their position or status within the company.

Two-Person Rule
Bask Ventures, Inc.'s internal counter-diversion strategy will rely heavily on the industry standard for high-level asset protection known as the "two-person rule." The two-person rule is defined as "a system designed to prohibit access by an individual to certain limited access areas and vulnerable cannabis products by requiring at all times the presence of two or more authorized personnel capable of detecting incorrect, unauthorized, or criminal behavior with respect to the task to be performed."

This statement, as well as an affirmation declaring that the employee will not willingly violate the spirit of the two-person rule, will be included in each employee's new hire paperwork. Prospective employees will sign an acknowledgement of this affirmation before being allowed to work at the cultivation facility.

Specifically, two people will be required to:

- Make any changes in form or quantity of cannabis within the California Cannabis Track and Trace (CCTT) system;
- Make physical changes in the form of cannabis (harvesting, trimming, or processing);
- Move cannabis to or from a storage or preparation area;
- Move cannabis to an area where a change in form is to be made;
- Move cannabis from one stage of cultivation to another stage of cultivation;
- Engage in any activity requiring weighing, counting or measuring of cannabis or cannabis products;

- Move waste cannabis to a waste disposal area;
- Enter the waste disposal area for any reason;
- Enter a secured cannabis storage area for any reason;
- Enter a cultivation room for any reason;
- Dispose of waste cannabis; and
- Take possession of any recalled cannabis product(s).

Access Control Policy

Minimizing access to cannabis within the cultivation facility is a key strategy for eliminating the potential for diversion to unintended recipients. Pursuant to 3 CCR § 8207 (h)(1), all cannabis will be located in secure, limited access storage areas that meet all applicable security requirements. Access Control allows employees to keep track of who is in the facility, what part of the facility they are accessing, and why. Signs will be clearly posted in the facility to signify different access areas. In addition to security personnel constantly monitoring video during operating hours, Bask Ventures, Inc. will frequently audit surveillance video of daily operations to ensure that employees are following policies restricting access to established zones in the facility.

Areas where the cannabis is stored, the cash safe, and any additional locked rooms are considered limited access areas, subject to the two-person rule. As such, no one person will enter or be left alone in these rooms for any reason. All limited access areas will be equipped with electronic locks that ensure only authorized employees can enter a room and automatically re-lock on use. Electronic access logs will be automatically generated at each occurrence of a door opening, recording the date, time, and security credentials of the employee responsible. The following additional security precautions will apply:

- All plant and package movements will be recorded within the CCTT system.
- Rooms are to remain secure when not in use or otherwise occupied.
- Company-issued uniforms must be worn by employees.

Employee Access and Security

Access to secure areas will be given only to individuals authorized by the General Manager (GM), who will have ultimate responsibility for issuing access. Issuance will be recorded by the GM, including documentation of any facility keys, alarm codes, electronic access codes, passwords, or combination codes.

Employees will be issued keys, based on their position, for access to specific rooms and storage areas. Limited access areas will be restricted to management. Facility employees are responsible for access security and must secure keys, access control cards, and security codes at all times. Employees may not provide access through any means to any other person; all keys and access cards issued to employees will be retained in the possession of the employee to whom they were issued and may not be transferred directly from one employee to another. Only managers may grant temporary access to any employee, contractor, or visitor.

Employees must report lost keys or access cards to their manager immediately. The GM and Security Manager will determine whether the system has been compromised and whether re-

keying is necessary. It will be against company policy to duplicate keys, share passwords, or share access codes.

Outside of operating hours, the Security Manager will ensure that all external doors are securely locked. Should Bask Ventures, Inc. choose to install electronic access hardware, it will have a failsafe (keys) and will remain in a fail-secure position in the event of a power outage.

Company-Issued Uniforms

Bask Ventures, Inc. will supply sanitary uniforms for all employees who work within limited-access areas. These uniforms will be cleaned regularly, be uniform in both color and appearance, bear no pockets or storage compartments, and be retained by the company at all times. At the start of a work shift, employees are expected to change clothes, store their personal belongings in their designated secure lockers, and begin their shift with a minimum of personal effects. Bask Ventures, Inc. may contract with a uniform provider for these services.

Prohibited Items

The following items will be prohibited while inside cultivation areas:

- Electronic devices such as cell phones, digital media storage devices, cameras, or other devices capable of capturing, recording, or storing information.
- Purses, bags, backpacks, or other containers.
- Food or drinks, with the exception of water in a clear bottle or doctor-prescribed medicine.

Consumption of cannabis will be prohibited on, or in the immediate vicinity of, any area of Bask Ventures, Inc.'s premises, by any individual at any time. Any person observed consuming cannabis on-site will be immediately escorted off the property by security personnel; employees may face further disciplinary action.

Visitor Policy

The cultivation facility will not be open to public visitors—access to cannabis will be restricted to the licensee, its employees, and contractors [3 CCR 8207 (h)(1)]. Only authorized contractors or vendors, law enforcement, authorized state employees, and other individuals sanctioned by law will be permitted into the facility. No one under the age of 18 will be allowed to visit the facility.

Contractors will be required to schedule an appointment to access the facility and present both personal identification and company credentials to the authorized security personnel upon arrival at the facility. Security will copy or scan the visitor's credentials, record their identification details on the Facility Visitor Log, and issue them a visitor's badge. Visitors must leave their visitor's badge conspicuously displayed for the duration of their visit. Sunglasses, masks, hats, or other clothing that covers the face will be prohibited. Visitors will be assigned an employee escort to keep track of their movements within the facility. Escorts will remain with contractors until their work is complete. When their scheduled appointment is finished, the visitor will return their badge to security. The Facility Visitor Log will be updated to reflect the time the badge was returned, all areas of the cultivation facility visited, and the visitor's final departure time.

Visitor Logs

The Facility Visitor Log will be filled out any time an authorized visitor is escorted into the cultivation facility. Every visitor will be required to provide personal and company identification to receive a numbered visitor's badge. Facility Visitor Logs will be available to the State for inspection at all times and will include:

- Name,
- Date and time in,
- Purpose for the visit,
- Employee or visitor ID badge number,
- All areas of the facility visited,
- Name of employee escorting visitor,
- Visitor signature, and
- Sign-out time.

Employee Training

New hire training on Bask Ventures, Inc.'s diversion prevention SOPs will be completed by all staff before they begin working at the facility. Training will include both facility and position specific materials. Trainees will be required to pass a quiz at the end of training to be eligible for their position. Mock situations will be used to provide specific, real world examples of how to prevent diversion. Staff will be trained to prevent and identify potential internal and external forms of diversion by correctly using the CCTT system, operating plans, log forms, camera and security plans, transport manifests, inventory data reporting, packaging, etc. Employees will be required to sign an affidavit acknowledging they have read the employee handbook and SOPs for their position and will comply with regulatory requirements set forth by the State of California.

Employees will be trained to recognize signs of possible internal theft by other employees (and the associated reporting procedures) to include:

- Another employee attempts to gain access to areas alone, in violation of the two-person rule;
- Another employee's financial situation seems to have improved in an unrealistically brief amount of time, e.g. the employee is making exorbitant purchases that are not likely or possible with their salary; and
- Another employee removes anything from a limited access area without supervisor approval, including trivial things such as used containers.

Developed in cooperation with their selected security vendor(s), Bask Ventures, Inc. will provide training modules on external counter-diversion strategy that will educate employees on:

- Proper reporting procedures for communicating with law enforcement;
- Proper completion of suspicious activity report forms;
- Counter surveillance training to identify possible criminal threats (surveillance, stalking); and
- Cal/OSHA workplace violence and late-night retail violence prevention training modules [8 CCR § 3342].

Internal Counter-Diversion Strategy

To ensure no cannabis plants or packages are removed by employees or other personnel otherwise authorized to be in the facility, an internal counter-diversion strategy is necessary. The internal counter-diversion strategy will focus on threats from within the company.

Employee Background Checks

Pursuant to [3 CCR § 8102], Bask Ventures, Inc. will submit a copy of a completed application for electronic fingerprint images submitted to the Department of Justice on any prospective employee. Accordingly, to determine whether an Bask Ventures, Inc. who has been convicted of a criminal offense that is "substantially related" to the qualifications, functions, or duties of the business for which the application is made should be issued a license, the Department will conduct a review of the nature of the crime, conviction, circumstances, and evidence of rehabilitation.

Substantially related offenses include violent felony convictions, serious felony convictions, felony convictions involving fraud, deceit, and embezzlement; or those involving the exploitation of children in handling any controlled substance or distributing a controlled substance to a minor; or "drug trafficking with enhancements," such as those involving children, conducted on school grounds, or with the use of a firearm [3 CCR § 8113].

Bask Ventures, Inc. will keep records of the results of all criminal history background checks requested and make the confirmation of criminal history background checks available for inspection upon request by the State or authorized law enforcement. Bask Ventures, Inc. will retain records in a secured area where they will be protected from debris, moisture, contamination, hazardous waste, fire, and theft [3 CCR § 8400]. Bask Ventures, Inc. will require employees to report any new or pending charges or convictions. If an employee is charged or convicted of a criminal offense that is substantially related to the qualifications, functions, or duties of their employment, Bask Ventures, Inc. will report it immediately to the State.

Bask Ventures, Inc. will ensure that the State is notified in writing of a criminal conviction of any
owner, either by mail or electronic mail, within 48 hours of the conviction. The written notification to the State will include the date of conviction, the court docket number, the name of the court in which the licensee was convicted, and the specific offenses for which the licensee was convicted.

Bask Ventures, Inc. will ensure that the State is notified in writing of a civil penalty or judgment rendered against the licensee or any owner in their individual capacity, either by mail or electronic mail, within 48 hours of delivery of the verdict or entry of judgment, whichever is sooner. The written notification will include the date of verdict or entry of judgment, the court docket number, the name of the court in which the matter was adjudicated, and a description of the civil penalty or judgment rendered against the licensee.

Bask Ventures, Inc. will ensure that the State is notified in writing of the revocation of a local license, permit, or other authorization, either by mail or electronic mail within 48 hours of receiving notice of the revocation. The written notification will include the name of the local agency involved, a written explanation of the proceeding or enforcement action, and the specific

violations that led to revocation.

Misrepresentation/Diversion of Waste

The misrepresentation of useable cannabis as waste is a common tactic of internal diversion. This may be done by employees avoiding the use of or exploiting the lack of information within the CCTT system pertaining to waste.

Employees have an opportunity to divert product between the time the product is deemed "waste" in the CCTT system, but before it is made unusable:

- Log the product (flower that has been dropped on the floor, packaging is damaged, product was recalled) as waste and destroyed, and
- Recover or segregate usable cannabis at the disposal site before it is made unusable and unrecognizable.

Other opportunities to divert product and avoid the CCTT system can occur when employees:

- Collect the residual cannabis remnants from ungloved hands (finger hash),
- Collect the residual cannabis remnants from trimming tools (scissor hash),
- Store small quantities of cannabis in loose fitting clothing,
- Use gloves to collect and use the residual cannabis remnants, or
- Steal containers used to store cannabis to collect and use the residual cannabis remnants.

To minimize the possibility of the diversion or misrepresentation of waste, Bask Ventures, Inc. will implement the following measures throughout the facility:

- Tasks to be performed within a limited access area will be completed using the two-person rule. If an employee must leave a designated area, the other employee will not remain alone in that area. The task will be halted and resumed when two employees are available again.
- Tasks will be compartmentalized by process, taking place within defined and separate areas. For example, the shipment receiving area will be separate from the site where waste is made unusable and unrecognizable.
- Gloves and disposable tools that will come into contact with and retain a residual amount of cannabis relevant to the task will be controlled. They will only be issued to employees while in the designated work area and will be disposed of in a locked container before the employee leaves that designated area. Under no circumstances will disposable gloves and tools be allowed to leave the designated work area.
- Non-disposable tools that will come into contact with and retain a residual amount of cannabis will be serialized and accounted for at the start and end of each assigned shift. These tools will never leave the area to which they are assigned. These tools will be sterilized at the end of each use by a chemical or cleaning agent that will render any residual amount of cannabis unusable.
- Employees will sign an affirmation declaring that they will consent to random searches and inspections at the request of a manager as a condition of employment.
- All containers used to store cannabis will be serialized and tracked.
- The area where waste is to be made unusable and unrecognizable will be clearly defined with tape or paint on the floor. This area will be free of clutter or storage to eliminate any potential "hiding places" for cannabis to be stored for later retrieval.

CCTT System Tracking

Prior to beginning operations at the cultivation facility, Bask Ventures, Inc. will implement the State-required CCTT system capable of providing inventory tracking for all cannabis within the facility. Chain of custody logic will be employed throughout the entire production life cycle. The complete chain of custody, combined with every transaction being recorded and regular inventory audits, provide a strong basis to prevent diversion, theft, or loss. This technology will enable tracking of every movement of inventory by capturing unique identifiers (e.g., IUDs and employee identifications) for every traceable entity such as product, transaction, transfers, transport manifests, purchase orders, adjustments, reconciliation, sales, product recalls, outdated and manual entries and associate these actions with an individual user's identification, ensuring the quality, security, and traceability of inventory at all times. All employees will receive training in the CCTT system and will be assigned a personal log-in and password that they will not share with anyone.

Bask Ventures, Inc. has utilized the experience of their selected cultivation consultant, Medicine Man Technologies, to identify all critical inputs in the CCTT system throughout the entire cultivation process, ensuring best practices are applied to accurately track inventory within the facility. The Inventory Control Manager will work with the Cultivation Manager and GM to ensure individuals with approved access to the CCTT system are properly managing these critical input points.

Some of the identified critical input points to the CCTT system are:

- Input of startup inventory, including seeds or immature cannabis plants;
- Creating immature cannabis plants from cuttings, clipping, or seedlings;
- Transitioning immature cannabis plants into a vegetative phase;
- Transitioning vegetative phase cannabis plants into a flowering phase;
- Harvesting cannabis plants upon completion of the flowering phase;
- Tracking immature cannabis plants and cannabis plants physical location within the facility;
- Tracking cannabis plant weights upon harvest and trim, including; total plant wet weight, flower/bud weight, trim weight, waste weight;
- Transitioning cannabis to a drying and curing phase;
- Tracking cannabis dry weight;
- Tracking cannabis that is in an active testing phase; and
- Tracking finished cannabis in batch or lot form.

If Bask Ventures, Inc. loses access to the CCTT system for any reason Bask Ventures, Inc. will prepare and maintain comprehensive records detailing all required inventory tracking activities conducted during the loss of access. Once access to the CCTT is restored inventory tracking activities conducted during the loss of access will be entered into the CCTT within three (3) business days. Bask Ventures, Inc. will document the date and time when access to the CCTT was lost and when it was restored and will note the cause for each loss of access. Bask Ventures, Inc. will not transfer cannabis or nonmanufactured cannabis products to a distributor until access to the CCTT system has been restored and all information has been recorded into the CCTT system [3 CCR § 8402].

Point-of-Sale

Bask Ventures, Inc. will also utilize a business-to-business point-of-sale (POS) system as secondary support software to provide sales information, calculate business metrics, quotas, and generate sales and inventory reports not available in the CCTT system. Working in conjunction with the CCTT system, the POS system will provide redundancy to help identify potential theft, loss, or diversion during inventory audits. Regular audits will be performed on both the CCTT system and the POS system to ensure that the data is consistent and to look for potential product diversion. Bask Ventures, Inc. will use the CCTT to reconcile all on-premises and in-transit cannabis or nonmanufactured cannabis products inventories at least once every 14 business days [3 CCR § 8406].

External Diversion

To minimize the risk of cannabis plants or packages being removed by burglaries, break-ins, and theft, the external counter-diversion strategy will focus on threats from persons not employed or contracted by the company. The external diversion strategy will consist of the facility infrastructure and security system, employee training, and a suspicious activity report system.

Facility Infrastructure and Layout

Pursuant to 3 CCR § 8106, the cultivation plan for the facility will include a detailed premises diagram showing all boundaries and dimensions (to scale) of all canopy areas including aggregate square footage if the canopy areas are noncontiguous; areas outside the canopy where only immature plants will be maintained; designated pesticide and other agricultural chemical storage areas; designated processing areas (if applicable); designated packaging areas (if applicable); designated composting areas (if applicable); designated secured areas for cannabis waste; and designated areas for harvested cannabis storage [3 CCR § 8106 (a) (1)].

All outdoor lighting used for security purposes will be shielded and downward facing [3 CCR § 8304 (c)].

Security System

Bask Ventures, Inc. has contracted with selected security vendor(s) to create a plan for maintaining the safety and security of the employees from known potential threats and hazards. This plan will also protect against any known or potential threats to Bask Ventures, Inc.'s facility operations, physical assets, or inventory from internal or external hazards including cannabis diversion and workplace violence.

Bask Ventures, Inc.'s selected security vendor(s) will install, monitor, and maintain facility camera monitoring and alarm systems pursuant to 16 CCR §§ 5044 and 5047; these systems will play an essential role in preventing diversion by detecting and stopping unauthorized entry that may lead to an adverse loss (please see Bask Ventures, Inc.'s Workplace Safety and Emergency Response for security alarm and video surveillance system details). Video surveillance cameras will be installed in all limited access areas (all rooms containing cannabis plants, cannabis storage, security equipment room, etc.), all entrances and exits to the facility including exterior windows, and any area in the facility where employees interact with cannabis plants or products.

Bask Ventures, Inc.'s Security Manager will be responsible for the following duties:

- Maintain and implement security SOPs and training;
- Manage security personnel;
- Provide training to personnel in risk and anti-diversion matters;
- Minimize risk to the premises;
- Primary point of contact with security vendors;
- Ensure compliance with all security procedures;
- Master security technology such as video surveillance, passwords, and CCTT / POS applications;
- Oversee security of cannabis product and cash;
- Ensure all security systems (surveillance, alarm, and access) are being consistently monitored; and
- Ensure all locks and security equipment remain in good working order, performing monthly inspections.

Suspicious Activity Reporting System

The suspicious activity reporting system will compile a record of events, witnessed by employees or recorded on the security and surveillance systems, so that a chain of events leading to possible break-ins or internal theft may be identified. An "incident" may be anything substantially out of the ordinary or suspicious that occurs during or after normal business hours. An attempted burglary or break-in, the presence of unauthorized individuals, or an employee injury are all examples of noteworthy incidents that should be documented. Serious incidents associated with theft or loss will be reported to the State and law enforcement agencies within 24 hours [16 CCR § 5036]. Incident Report forms (please see Appendix A – Logs and Forms) will include the following and be provided to the State along with relevant video surveillance footage upon request:

- Witness name, contact information, and signature;
- Incident date, time, and location;
- Person(s) involved in incident;
- Witness description of incident; and
- If incident involved or was reported to authorities, date of report and agency contact information including name(s) of agency employees.

Recordkeeping Policies and Procedures

Bask Ventures, Inc. will implement a recordkeeping plan that adheres to all the requirements set forth in California regulations. Bask Ventures, Inc. will maintain copies at the cultivation facility of all required books, records, papers, documents, data, or other physical or electronic information necessary to fully account for each transaction conducted under its license. Pursuant to [3 CCR § 8400], all records will be retained by the Bask Ventures, Inc. for the current year and at least the seven (7) proceeding calendar years, able to be made available to the Bureau of Cannabis Control, CalCannabis, or other authorized state or law enforcement agency ("the State") upon request.

To ensure no loss of critical data, Bask Ventures, Inc. has contracted with a third-party security vendor to design and install a customized security system that includes data retention and back-up for all critical electronic records [16 CCR § 5037 (d)]. Electronic information will be stored both on site in short term storage, and further backed up by the security vendor at their offsite facility, creating maximum redundancy and long-term data security.

The General Manager (GM), supported by the Quality Assurance Manager (QAM), the Inventory Control Manager (ICM), and the Cultivation Manager, will be responsible for proper recordkeeping implementation and the ongoing management of cultivation records. Records will be maintained and stored to ensure that locating information can be accomplished by anyone with appropriate authorization and that documents are easily accessible for investigative purposes.

All physical records will be kept in a locked file cabinet in a secure, limited access area with keys granted only to Bask Ventures, Inc.'s designated employees [3 CCR § 8400 (e) (2) and 16 CCR § 5037]. These records will be scanned regularly to create an electronic copy. Electronic information will then be backed-up on a secure data retention system to protect against loss. Records will be kept in a manner that allows them to be produced for the State at the licensed premises in either hard copy or electronic form, whichever the State requests [16 CCR § 5037].

Records maintained will include, but not be limited to:

- A copy of Bask Ventures, Inc.'s state operating license, prominently displayed in the facility;
- Financial data that accounts for all transactions conducted at the facility;
- Inventory records, including transport manifests and audits
- Security alarm records including visitor logs and video surveillance records;
- Personnel records;
- Sanitation and facility maintenance records;
- Cultivation production records, including nutrient feeding schedules and pesticide and chemical applications;
- Cannabis disposal;
- Shipping manifests,
- Sample testing and results;
- Theft and loss records;
- Recall and complaint records; and

- Cultivation Standard Operating Procedures (SOPs).

Electronic Records Retention

All electronic records will be stored both onsite in short-term storage, and offsite, in long term backup. Onsite records storage may include electronic media that is backed up daily on a secure server. The secure server will be physically located in a limited access room on the premises. In general, on site backup storage will include at least three years of historical data. Remote data storage will include all data records that are at least one year and older. Sensitive files may be password protected or stored in a password protected file storage system.

Any electronic storage system used by Bask Ventures, Inc. will:

- Guarantee the confidentiality of the information stored within,
- Provide safeguards against erasures and unauthorized changes in data after the information has been entered,
- Be able to place a litigation hold or enforce a records retention hold for purposes of conducting an investigation or in relation to ongoing litigation, and
- Be reconstructable in the event of a computer malfunction or accident resulting in the destruction of the data bank.

Company files will never be stored in public internet spaces, including unsecured file storage sites. Emailing sensitive data files to anyone outside the company will be strictly prohibited without the permission of the GM. Customer-specific transaction data and contact information, including email addresses, will not be shared with any third-party without customer's consent.

Standard Operating Procedures

Bask Ventures, Inc. has designed the SOP document recordkeeping system to operate in a consistent format across all divisions of the company for maximum organization, control, and ease of training and use. Bask Ventures, Inc. has developed recordkeeping SOPs with the assistance of their premier cultivation consultant, Medicine Man Technologies (MMT), to aid in design and implementation. MMT's comprehensive legacy SOPs, forms and checklists have been successfully tested, evolved, expanded, validated, and improved in a real-world market since the inception of Colorado's cannabis industry in 2009. Assisting Bask Ventures, Inc. with the design and implementation of an SOP system based on MMT's successful procedures yet customized for the individual facility will dramatically reduce the time required to implement state-of-the-art processes and recordkeeping procedures.

The SOP system will be maintained in a secure, cloud-based environment with administrative controls that allow for the immediate modification or removal of employee access. Employees will access a view-only environment that does not allow editing, downloading, or printing except to specifically-authorized personnel. Online capability will allow management to efficiently update and publish the SOPs. The Quality Assurance Manager (QAM) will be responsible for maintaining and updating both hardcopy and electronic versions of the SOP manual. The QAM will approve and document all SOP changes on a master change log, keeping a chronological record of all significant process changes, the reason for the change, (such as new regulations), the date the change was executed, and the QAM's initials indicating their final approval.

The SOPs will be organized using a number sequence that identifies the cultivation process to which it relates. For example, the 300 series may cover Cloning while the 700 series may be Sanitation. Related forms and checklists will be integrated into the SOPs through hyperlinks that take the user to the appropriate database. The forms database will be similarly organized with the same numbering sequence. A Clone related form, for example, would exhibit a 300-series number, a Sanitation checklist a 700-series number. Each form and checklist will indicate the length of time it must be archived and kept available for State inspection.

Inventory Recordkeeping

The California Cannabis Track and Trace (CCTT) system will provide real-time tracking and accountability for all plants in the facility from seeds or clones, through each stage of the plant life cycle, to post-harvest preparation including trimming, drying, curing, batching, and packaging. Accountability within the system will include transaction level data that records every employee interaction with plants. This includes plant movement within the facility, nutrient feeding, pesticide application, cultivation notes, and testing results. Every action will appear on the plant history detail record with the associated time/date, user credentials, actions performed, and the status change details.

Bask Ventures, Inc. has utilized the experience of their selected cultivation consultant, Medicine Man Technologies, to identify critical input points into the CCTT system throughout the entire cultivation process, ensuring best practices are applied to accurately track cannabis inventory within the facility. Data entry access will be restricted to a limited number of employees to keep the information properly managed and limit the opportunity for unlawful diversion through manipulation of data or the software. The ICM will coordinate with the Cultivation Manager and GM to ensure individuals with approved access to the CCTT system are properly managing critical input points.

Some of the identified critical input points to the CCTT system are:

- Input of startup inventory, including seeds or immature cannabis plants.
- Propagating immature cannabis plants from cuttings, clipping, or seedlings.
- Transitioning immature cannabis plants into a vegetative phase.
- Transitioning vegetative phase cannabis plants into a flowering phase.
- Harvesting cannabis plants upon completion of the flowering phase.
- Changing the physical location of immature cannabis plants and cannabis plants within the facility.
- Tracking cannabis plant weights upon harvest and trim, including; total plant wet weight, flower/bud weight, trim weight, waste weight.
- Transitioning cannabis to a drying and curing phase.
- Tracking cannabis dry weight.
- Tracking cannabis that is in an active testing phase.
- Tracking finished cannabis in batch or lot form.

The ICM acting as the CCTT account manager (or an assigned system user) will report in the system any change in the disposition of cannabis plants on the licensed premises. Any changes in plant disposition within the facility will be made within three business days of the change. Changes in disposition of cannabis plants include [3 CCR § 8405 (c)]:

- Flowering;
- Destruction or disposal;
- Harvest;
- Processing;
- Storage; and
- Packaging.

Each of these transactions will include:

- Date of transaction or event,
- Employee identification number responsible for data entry,
- Identification number of receiving cannabis facility,
- Batch identification number, and
- Plant identification number, if applicable.

The following inventory items will be maintained in the CCTT system and tagged with a unique identification number assigned for each:

- The number, weight and type of seeds (or clones);
- The number of immature cannabis plants;
- The number of cannabis plants;
- The number of cannabis products ready for sale;
- The number of damaged, defective, expired or contaminated seeds, immature cannabis plants, cannabis plants and cannabis products awaiting disposal; and
- Records of any theft, loss, or other unaccountability of any cannabis.

Inventory Audits

In addition to ongoing inventory tracking in the CCTT system, Bask Ventures, Inc. will implement inventory controls and procedures necessary to conduct regular and random inventory reviews and comprehensive inventory audits at the facility. Inventory audits will be conducted by no less than two authorized employees, led by the ICM with the support of the GM and authorized cultivation agents.

Bask Ventures, Inc.'s comprehensive inventory review process will ensure that physical on-hand inventory within the facility is equal to the inventory numbers within the CCTT system for all seeds, immature cannabis plants (clones), mature cannabis plants, harvested cannabis, and packaged cannabis ready for sale.

Reoccurring inventory audit reports will be documented in both written and electronic forms and provided to the GM for review and filing with the State for compliance [3 CCR § 8408]. Reports will include the date of the audit, a summary of the inventory audit findings, and the names, signatures, and titles or positions of the individuals who conducted the inventory audit.

Comprehensive Audits

On a weekly and monthly basis, the ICM will lead a complete inventory audit of the entire facility and compare it to the CCTT system. Product and plant UID barcodes will be scanned to take counts and weights recorded from properly calibrated digital scales. Upon completion, Bask

Ventures, Inc. will review the results and determine if further action is required. These audit reports will include (but are not limited to):

- The date of the inventory audit;
- The amount of cannabis on hand:
  - The total count of plants, whether in the flowering, vegetative, or clone phase of growth and organized by room in which the plants are being grown;
  - The batch number, weight, and strain name associated with each batch at the facility that has been quarantined for testing or ready for sale; and
  - The total number of plants and every unique plant identifier that have been harvested but are not yet associated with a batch.
- The amount of cannabis sold since previous inventory, which will include:
  - The date of sale;
  - The license number and name of the facility to which the cannabis was sold; and
  - The batch number, registered product name and quantity of cannabis sold.

Transport Manifest Records

Every shipment sent from or received by the facility will be tracked in detail by an accompanying transport manifest. Prior to transferring cannabis to a transporting distributor, Bask Ventures, Inc. will generate a transport manifest within the CCTT system. The distributor will print four copies of each transport manifest the day of transport - two for the distributor's transport driver, one for the originating (shipping) facility and one for the destination facility (shipment recipient). The distributor will provide a copy of the transport manifest to the recipient upon delivery. Prior to accepting any cannabis, Bask Ventures, Inc. will require a transport manifest to be generated within the CCTT system and will receive a paper copy from the originating facility to check against the actual shipment.

Once the delivery is completed, paper transport manifests will be filed, and electronic copies from the CCTT system will be backed up along with any other documents associated with the shipment. Access to manifest records will be restricted to Bask Ventures, Inc.'s management team. Access will require two-person authorization. Filed transport manifest information will be mirrored in the point-of-sales records, allowing for quick identification and reconciliation of potential gaps during inventory and shipping audits. Every transport manifest will include [16 CCR § 5049]:

- Date of transport,
- Name of person transporting,
- Signature of person transporting,
- Make, model, license number of transport vehicle,
- License number, address, phone number, and name of originating facility;
- License number, address, phone number, and name of destination entity;
- Quantities by weight or unit of each type of cannabis or cannabis product contained in transport,
- Estimated date and time of departure,
- Estimated date and time of arrival,
- Route to be travelled,
- Details for extenuating circumstances (e.g., flat tire),
- Name of person receiving or rejecting product, and

- Signature of person receiving or rejecting product.

Storage Related Records

Storage recordkeeping will confirm that storage area environments are consistently maintained at the correct temperature and humidity and in a sanitary condition. Recordkeeping will also track chain-of-custody, inventory quantities, and important product dates such as date of receipt, production date, and use-by date. The following are examples of recordkeeping logs that will be utilized throughout the facility:

- Temperature Logs - To document the temperature of all climate-controlled storage areas. Any deviation will be addressed and corrected immediately. Corrective action will be recorded.
- Sanitation Logs - To document daily cleaning and sanitation of areas.
- Inventory Logs - To document with direct observation and supervisor confirmation the inventory of all cannabis product at the beginning and end of every day.

Testing Samples & Results

As cannabis plants are harvested, trimmed, dried, and cured, they are aggregated into a harvest batch. After the QAM determines the batch has been properly cured by passing all internal quality control checks, the QAM will contact a licensed testing laboratory [16 CCR § 5002, 5702/5703] and arrange for the transport of samples of each harvest batch for required testing via contracted licensed professional distributor services [16 CCR § 5002 (29) (C) (iii)].

The QAM will record the batch number for each sample taken, along with the date, the time, and the name and employee ID of the employee who collected the samples. Laboratory testing information will confirm the product safety, cannabinoid profile, terpene profiles, and any additional State-required testing results. Once laboratory test results for a harvest batch are returned, they will be entered into the CCTT system by the QAM, where the harvest batch information and associated test results are then transferred to the harvest batch label. As stated in 3 CCR § 8211, Bask Ventures, Inc. will not accept returns of cannabis plants or nonmanufactured cannabis products after transferring possession of them to another licensee after testing is performed (pursuant to BPC § 26110).

Bask Ventures, Inc. will store packaged harvest batches at the facility under quarantine until the completion of required laboratory testing. Each harvest batch will be easily distinguishable from other harvest batches until it is broken down into packages. No cannabis will be sold by Bask Ventures, Inc. prior to receiving laboratory test results for its associated harvest batch.

The testing laboratory will enter individual testing results into the CCTT system along with a "pass/fail" designation for each batch [16 CCR § 5049 (a) (7)]. The QAM will review test results upon receipt to determine if the batch meets Bask Ventures, Inc.'s strict quality control standards and release for packaging upon approval.

Bask Ventures, Inc. may sell cannabis or cannabis products created prior to the implementation of the Medicinal and Adult-Use Cannabis Regulation and Safety Act that have not been tested. If so, the cannabis or cannabis products will have a label affixed to each package that clearly states,

"This product has not been tested as required by the Medicinal and Adult-Use Cannabis Regulation and Safety Act."

Complaints, Returns, and Recall Records
Upon completion of a recall the following information will be summarized and submitted to the State. Recalled inventory data will be entered into the CCTT system where appropriate:

- The reason for the recall notification;
- The name of the Recall Notification Coordinator;
- The total amount of recalled cannabis, including types, forms, batches, and lots;
- The number of recalled samples, types, batches and lots, if applicable, sent to laboratories, the names and addresses of the laboratories, the dates of testing and the results by sample;
- The manner of disposal of the recalled cannabis, including:
    - The name of the individual overseeing the disposal of the recalled cannabis,
    - The name of the disposal company, if applicable,
    - The method of disposal,
    - The date of disposal, and
    - The amount disposed of by types, batches and lots, if applicable; and
- Any other information required by the State.

Security and Surveillance Records
Pursuant to 16 CCR §§ 5044 and 5047, Bask Ventures, Inc. will maintain professionally-monitored security alarm and video surveillance systems; all records related to the alarm system, monitoring, and activity will be provided to the State upon request. Video surveillance and security records will be located in a limited access security room, available only to authorized personnel, including the GM, QAM, and the Security Manager. Within this room, security recordings and backup power devices will be further secured in a locked cabinet or closet to protect them from tampering or theft [3 CCR § 8400 (e) (2)].

Secondary trip devices that operate independently of the facility's primary security alarm system will be installed in this room at critical access points to protect the room. This ensures that, in the unlikely event an intruder successfully penetrates the facility's primary alarm system, there is an additional layer of protection guarding sensitive records.

Bask Ventures, Inc. will retain a record of all inspections, servicing, alterations, or upgrades to the security systems. A current list of employees authorized to access the security records will be maintained onsite. A dedicated log will be kept specifically for surveillance record access which includes:

- Current list of employees authorized to access surveillance records,
- The identities of the employee or employees responsible for monitoring the video surveillance system,
- The identity of the employee who removed the recording from the video surveillance system storage device and the time and date removed,
- The identity of the employee who destroyed any recording, and
- A maintenance log which includes:
    - Date/Time

- Name
- Reason for service.

Video Surveillance Records

Bask Ventures, Inc. will have a video surveillance system that, at a minimum, consists of digital or network video recorders, cameras capable of meeting the recording requirements outlined by the State, video monitors, digital archiving devices, and a color printer capable of delivering still photos [16 CCR § 5044]. The system will have minimum camera resolution of 1280 x 720 pixels. The surveillance-system storage device or the cameras will be transmission control protocol (TCP) capable of being accessed through the Internet. Each camera will be permanently mounted and in a fixed location. Each camera will be placed in a location that allows the camera to clearly record activity occurring within 20 feet of all points of entry and exit on the licensed premises and allows for the clear and certain identification of any person and activities in all areas required to be filmed under § 5044 subsection (e). The video surveillance system will be equipped with a failure notification system that provides notification to Bask Ventures, Inc. of any interruption or failure of the video surveillance system or video surveillance system storage device. Bask Ventures, Inc. will ensure that the video surveillance system does all of the following:

- Records at a minimum the following areas [16 CCR § 5044]:
  - Any areas where marijuana products are weighed, packed, stored, loaded, and unloaded for transportation, prepared, or moved within the facility.
  - Limited access areas and security rooms. Transfers between rooms must be recorded.
  - Areas storing a surveillance system storage device with at least one camera recording the access points to the secured surveillance recording area.
  - The entrances and exists to the building must be recorded from both indoor and outdoor vantage points.
- Effectively and efficiently records images of the area under surveillance with sufficient resolution 24 hours a day at a minimum of 15 frames per second (FPS).

Bask Ventures, Inc. will have cameras that record continuously 24 hours per day and recorded images will clearly and accurately display the time and date. Bask Ventures, Inc. will install each camera so that it is permanently mounted and in a fixed location. Each camera must be placed in a location that allows the camera to clearly record activity occurring within 20 feet of all points of entry and exit on the facility and allows for the clear and certain identification of any person, including facial features, and activities, including sales or transfers, in all areas required to be recorded under 16 CCR § 5044.

Bask Ventures, Inc. will secure the physical media or storage device on which surveillance recordings are stored in a manner to protect the recording from tampering or theft. Bask Ventures, Inc. will keep surveillance recordings for a minimum of 90 days, except for in instances of investigation or inspection by the State through its investigators, agents, auditors, or the state police, in which case Bask Ventures, Inc. will retain the recordings until such time as the State notifies the licensee that the recordings may be destroyed, and will be kept in a manner that allows the State to view and obtain copies of the recordings at the facility immediately upon

request. Bask Ventures, Inc. will also send or otherwise provide copies of the recordings to the State upon request within the time specified by the State [16 CCR § 5044 (j)].

Suspicious Activity Reporting System

The suspicious activity reporting system will compile a record of events, witnessed by employees or recorded on the security and surveillance system, so that a chain of events leading to possible break-ins or internal theft may be identified. An "incident" may be anything substantially out of the ordinary that occurs during or after normal business hours. An attempted burglary or break-in, the presence of unauthorized individuals, or a visitor or employee injury in the facility are all examples of noteworthy incidents that should be documented. Serious incidents associated with theft or loss will be reported to the State and law enforcement agencies within 24 hours [16 CCR § 5036]. Incident Report forms (please see Appendix A – Logs and Forms) will be provided to the State along with relevant video surveillance footage upon request. Incident Report forms will include:

- Witness name, contact information, and signature;
- Incident date, time, and location;
- Person(s) involved in incident;
- Witness description of incident; and
- If incident involved or was reported to authorities, date of report and agency contact information including name(s) of agency employees.

Visitor Logs

A Facility Visitor Log will be filled out any time an authorized visitor is escorted into the cultivation facility. Every visitor will be required to provide personal and company identification and provided a numbered visitor's badge. The Facility Visitor Log will be available for State inspection at all times and include:

- Name,
- Date and time in,
- Purpose for the visit,
- Employee or visitor ID badge number,
- All areas of the facility visited,
- Name of employee escorting visitor,
- Visitor signature, and
- Sign-out time.

Financial Records

Bask Ventures, Inc.'s Chief Financial Officer will be responsible for the security and accuracy of all financial records maintained for the cultivation facility. The accumulation of comprehensive, reliable sales data provides management with critical information needed for measuring performance as well as strategizing and planning. Bask Ventures, Inc. will employ a business-to-business point-of-sale (POS) system that offers a variety of analytical data. Transaction information regarding the sale, transfer, transport, or disposal of cannabis will also be logged in the CCTT system, supplementing and reinforcing the information reflected in Bask Ventures, Inc.'s sales financial records [16 CCR § 5049 (b) (7)].

Financial recordkeeping will include:

- All financial transactions and the financial condition of the business, including contracts for services performed or received;
- Purchase invoices, bills of lading, manifests, sales records, copies of bills of sale, and any supporting documents (including the items and/or services purchased, from whom the items were purchased, and the date of purchase);
- Bank statements and canceled checks for all accounts relating to the business; and
- Accounting and tax records related to the business and all investors in the facility.

Sales Data

The POS system will invoice sales and keep track of finished goods inventory so management can plan production volumes. Some of the system's key performance indicators (KPI) include:

- Sales by product,
- Sales by customer,
- Sales by region,
- Sales by sales representative,
- Gross profit by date range, and
- Gross profit by product line.

Sales invoices and receipts for cannabis will be retained electronically and will be readily accessible for examination by the department, other state licensing authorities, any state or local law enforcement authority, and the California Department of Tax and Fee Administration. Each sales invoice or receipt shall include all the following [3 CCR § 8401]:

- Name, business address, and department issued license number of the seller;
- Name, business address, and department issued license number of the purchaser;
- Date of sale or transfer (month, day and year). The date of any sale or transfer of cannabis and nonmanufactured cannabis products shall be the date of transfer to the licensee receiving it;
- Invoice or receipt number;
- Weight or quantity of cannabis and nonmanufactured cannabis products sold;
    - Weight. For the purposes of this section a licensee must use wet weight or net weight. Wet weight and net weight shall be measured, recorded and reported in U.S. customary units (e.g., ounce or pound); or International System of Units (e.g., kilograms, grams, or milligrams).
    - Weighing Devices. A licensee shall follow weighing device requirements pursuant to section 8213 of this chapter.
    - Count. For the purposes of this section, "count" means the numerical count of the individual plants or units.
- Cost to the purchaser, including any discount applied to the total price, shall be recorded on the invoice.
- Description for each item including strain or cultivar, and all of the applicable information below:
    - Plant;
    - Flower;
    - Leaf;
    - Shake;

  - Kief; and
  - Pre-rolls.
- Signature of the seller, or designated representative of the seller, acknowledging accuracy of the cannabis and nonmanufactured cannabis products being shipped.
- Signature of the purchaser, or designated representative of the purchaser, acknowledging receipt or rejection of the cannabis or nonmanufactured cannabis products.

Personnel Records

Bask Ventures, Inc. will maintain accurate personnel records by creating a dedicated employee file for every new hire; these records will be maintained for at least seven (7) years after an employee ceases to work at the facility. Pursuant to 3 CCR §8400 (d) (7) and (8), all personnel records will include:

- Employee name, address, phone number and emergency contact information;
- Employee social security or individual tax payer ID number;
- Employee security access credentials;
- All records relating to the hiring of employees, including confirmation of criminal history background checks, applications, documentation and verification of references, and any other related materials;
- All training, education, and disciplinary records;
- Records of days worked and time off;
- Salary and wages paid to each employee, including any executive compensation, bonuses, benefits, or items of value paid to the employee; and
- Date of hire and date of separation (if applicable) from employment and the reason for the separation.

Production Records

The cultivation of cannabis from seed to sale is complex, technical, and involves a vast array of interdependent processes. Each stage of growing must be planned and executed in a consistent and tightly-controlled environment. As in the pharmaceutical industry, recordkeeping plays a vital role in ensuring the quality, consistency, and purity of the final cannabis product, maintaining checks and balances for the entire process that help keep the facility consistently compliant with current regulations.

Bask Ventures, Inc.'s cultivation SOPs require the creation and maintenance of meticulous records for every plant through every stage of growth, from seed or clone to packaged cannabis shipment. Production records will include thorough documentation of every interaction with the plants, including but not limited to planting, harvesting, curing, weighing, packaging, and labeling. Soil amendments, fertilizers, pesticides, nutrients or other chemicals or inputs applied to the growing medium or plants or used in the process of growing cannabis will be tracked through inclusion in product management, pesticide application, fertilizer application, and daily inspections.

Bask Ventures, Inc.'s comprehensive production records will provide factual evidence that each step through cultivation and production has been adequately performed to predetermined specifications. Recordkeeping will meet all regulatory requirements and streamline business operations, dramatically minimizing the risk of releasing a product that is out of specification or

otherwise compromised. This system will compel employees to follow procedure and allows for the identification of any process deviation(s) so they may be corrected, or the product may be disposed of before it is released.

Monitoring records will be kept confirming that cultivation standards are kept within the critical limits of each Critical Control Point (CCP). Corrective actions will be taken in response to critical limit deviations. Corrective actions will be recorded on the Hazard Analysis and Critical Control Points (HACCP) Monitoring Log along with a description of the deviation, final disposition of the affected product, and the name of the employee responsible for taking the corrective action. Responsibility for proper plan implementation and ongoing management will be a primary responsibility of the GM, supported by the QAM, the ICM, and the Cultivation Manager.

Cultivation Equipment Maintenance Log

In addition to daily checks and surface cleaning performed by the Cultivation Team, Bask Ventures, Inc.'s Maintenance Team will routinely inspect, calibrate, and check the following equipment to ensure accuracy:

- Automatic, mechanical, or electronic equipment (i.e., HVAC, Lighting, RO Filtration)
- Scales, balances, or other measurement devices used in the operation.

The Maintenance Team will be responsible for recording any performed maintenance, cleaning, and calibration of equipment and will require signoff from the Maintenance Manager upon task completion. The equipment maintenance log will include:

- Date,
- Time,
- Employee ID,
- Equipment location (room number/name),
- Equipment model number or description,
- Problem,
- Solution,
- Description of task performed, and
- Manager signoff.

Cultivation HVAC Log

The system utilized in the cultivation process for regulating temperature, humidity and ventilation will be the STULZ™ Computer Room Air Conditioning (CRAC) HVAC units. Parameters for ambient conditions will be set to the precise environment and the computer system will maintain those controlled parameters. If the system detects a shift beyond the set parameters, the system will display a red light, indicating there is a problem. The system will electronically monitor, record, and store in real-time the temperature, humidity, dewpoint, CO_2 level, and filter status. A physical written log will be updated whenever any conditions fall outside of the acceptable parameters along with the corrective action taken. The Maintenance Team will be responsible for the daily upkeep of this log and will require Maintenance Manager signoff upon task completion. This log will include:

- Date,
- Time,

- Employee ID,
- Room number,
- Equipment model number or description,
- Problem,
- Solution,
- Description of task performed, and
- Manager signoff.

Cultivation Lighting Log

A digital lumens light meter will be utilized weekly to measure the lumens in the light to ensure that the lamps utilized in the vegetative and flower rooms are performing at the optimal level and capacity. A light intensity meter will also be used weekly to measure the number of BTUs emitted from a lamp. This will ensure the lighting is performing to standard. If the meters detect diminished performance or lack of efficiency, the lamp or bulb will be changed out immediately. The lighting log will be accessible inside each cultivation room on the wall. The Maintenance Team will be responsible for maintaining this log daily and will require Maintenance Manager signoff upon task completion. This log will include:

- Date,
- Time,
- Employee ID,
- Room number,
- Lighting fixture number,
- Lumens reading,
- Light intensity reading,
- Problem,
- Solution,
- Description of task performed, and
- Manager signoff.

Pesticide Applications

Before purchasing or using any pesticides at the cultivation facility Bask Ventures, Inc. will obtain an operator identification number and a site identification number from the County Agricultural Commissioner [3 CCR §§ 6622, 6623] ("Commissioner"). Every pesticide use, whether for plant or non-plant pests, will be documented on a Pesticide Application Log to include [3 CCR § 6624 (b)]:

- Date of application, including hour the treatment was completed;
- Application method (air, ground, other);
- Location of property treated;
    - The site identification number issued to the operator of the property treated;
    - Field location (outdoor cultivation) or building location (indoor cultivation), such as block/room/table.
    - Size of area treated.
- Pesticide product name;
- Pesticide EPA or DPR registration number on the pesticide label;
- Amount of product applied;

- Name of applicator; and
- Applicator certification/permit number (if applicable).

Bask Ventures, Inc.'s Cultivation Manager will be responsible for compiling Pesticide Application Logs and submitting monthly pesticide use reports to the Commissioner. Pesticide use reports will be on a (DPR) form or in a format approved by the director and will be submitted by the 10th day of the month following the month in which any pesticide work was performed; a copy of which will be retained by Bask Ventures, Inc. for a period no less than two years and will be made promptly available to the director or Commissioner upon request [3 CCR §§ 6624, 6626, 6627]. In addition to the information provided on individual pesticide application logs, monthly use reports will also include:

- The operator (Bask Ventures, Inc.) identification number issued to the operator of the property treated;
- Location of the property treated, by county, section, township, range, base and meridian;
- Total acreage (planted) or units treated at the site;
- Name of the operator (Bask Ventures, Inc.) of the property treated;
- Address of applicator; and
- Crop commodity, or site treated.

Cultivation Sanitation Log

The Maintenance Team will be responsible for maintaining sanitation logs and will require Maintenance Manager signoff upon task completion. The log will contain:

- Date,
- Time,
- Employee ID,
- Product name and EPA Registration Number,
- Room number or location description,
- Quantity used,
- Description of task performed, and
- Maintenance Manager signoff.

Cultivation Waste Disposal Log

Bask Ventures, Inc. will maintain accurate and comprehensive records regarding cannabis waste that account for, reconcile, and evidence all activity related to the generation or disposition of cannabis waste. Records are subject to inspection by the State and will be kept for a minimum of seven (7) years pursuant to section § 8400 [3 CCR § 8108 (j)]. A separate written record will be created on the Waste Disposal Log and entered into the CCTT system every time the disposal process happens. This log will include:

- The date and time of the disposal,
- The manner of the disposal,
- The volume and weight of the approved solid waste media used to render the cannabis unusable,
- The batch number(s) associated with the cannabis scheduled for destruction,
- The reasoning for and description of the disposal, and
- The signature of the authorized employee(s) overseeing the disposal of the cannabis.

Complaints, Returns, and Recall Notifications

Patient, product, and public safety are Bask Ventures, Inc.'s top priority. Preventative quality assurance measures are integrated into facility operations to limit the possibility that produce will cause serious adverse health consequences or could even cause temporary or medically reversible adverse health consequences.

An "adverse event" can be any health-related episode associated with the use of cannabis that is undesirable, unexpected, or unusual. Complaints of adverse events will be regarded and handled with the utmost care, importance, and urgency.

Bask Ventures, Inc. has developed standard operating procedures (SOPs) for receiving and investigating complaints regarding an adverse event from the consumption of cannabis originating from the cultivation. These SOPs include identifying and isolating any cannabis deemed unsafe or unfit for consumption to prevent or minimize its distribution to other cannabis facilities (i.e., manufacturer, distributer, or dispensary) and end consumers (including retail customers, medical patients and caregivers, if applicable). Should an investigation determine that cannabis from the cultivation facility may be unsafe for consumption, Bask Ventures, Inc. will immediately initiate its Recall Notification Plan to protect the public health from products that present a risk of injury or are otherwise defective.

Bask Ventures, Inc.'s Quality Assurance Manager (QAM) will be responsible for implementing investigation and recall notification procedures consistent with facility operations and for carrying out those procedures in a manner that maximizes the effectiveness of the recall while minimizing risks to public health and safety. These SOPs will include:

- Identifying the factors that necessitate a recall notification;
- Creation of a Recall Notification Committee responsible for investigation and recall procedures;
- Investigation of complaints received from (patients and caregivers, if applicable) retail customers, processing or manufacturing partners, or dispensary partners about cannabis that may be causing adverse patient reactions;
- Correct testing of harvest batches associated with the complaint;
- Handling and disposal of recalled cannabis;
- Reporting adverse event investigation results to the Bureau, Department, and CalCannabis ("the State").

Bask Ventures, Inc.'s Recall Notification Plan includes:

- Responsibilities of the Recall Notification Committee and their execution of the Recall Notification Plan;
- Procedures for identifying all affected cannabis plants involved including a unique identification number that will match the recalled items with a lot and batch number and its test results to facilitate any warnings or recalls the State deems appropriate;
- Process to notify cannabis facilities, supplying vendors, key agencies, and the public to whom the cannabis may have been sold or otherwise distributed; and
- How Bask Ventures, Inc. will dispose of any remaining affected cannabis.

Pursuant to 3 CCR § 8211, Bask Ventures, Inc. will not accept returns of cannabis plants or nonmanufactured cannabis products after transferring possession of cannabis plants or nonmanufactured cannabis product to another licensee after testing is performed in accordance with § 26110 of Business and Professions Code.

Preventing Adverse Effects

Bask Ventures, Inc.'s training program will include basic training on a variety of potential health threats associated with cannabis and how to prevent them. As a proactive measure for detecting and preventing adverse events, Bask Ventures, Inc. will maintain a small portion of each harvest batch for periodic quality assurance testing.

Molds and mildews are some of the most common contaminants found in cannabis. Most often, the effects of these contaminants are mild, similar to cold or flu symptoms such as a stuffy or runny nose, sneezing, or coughing. However, in some individuals, or with particular types of molds or mildew, the health consequences can be much more severe. Bask Ventures, Inc. will use sanitation protocols and climate controls in the facility to manage temperature and humidity and to minimize the possibility of mold and mildew development. Surfaces in cultivation areas will be sealed with a mold- and mildew-resistant paint. Bask Ventures, Inc. will also train employees to identify the signs of mold and mildew during their daily cultivation area inspections, along with proper quarantine and mold mitigation procedures. Laboratory testing will help to identify mold and mildew but is intended purely as a fail-safe for finished product, not as a substitute for proper preventative measures.

Any product identified as contaminated with mold or mildew will be weighed and recorded in the inventory track and trace system and placed in a dedicated and secured quarantine area until destroyed according to Bask Ventures, Inc.'s Waste Disposal SOPs. The cultivation area(s) where contaminated plants were identified will also be inspected for mold and mildew along with any signs of water damage or leakage.

Unauthorized and/or excessive amounts of residual pesticides or other agricultural chemicals in cannabis can have a wide spectrum of health effects depending on the substance, method of exposure, and individual sensitivity.

Bacterial contamination such as E. Coli, Salmonella, Aspergillus, or other harmful strains can also be a threat in cannabis. These are the least common contaminants identified in cannabis but can result in severe health consequences for people when exposed. These microorganisms often go undetected when present. While laboratory testing should provide assurance that cannabis is free of microbial contaminants, prevention is the most important and effective defense against them. To that end, employees will be required to attend ServSafe® training; while this course is intended primarily for food handlers, many of the covered principals apply to cannabis cultivation as well.

Recall Notification Committee

Bask Ventures, Inc. will designate key personnel from various areas of the facility as part of a Recall Notification Committee responsible for the oversight and review of all complaints and recall notifications. All cultivation employees, even if they do not participate on the Recall

Notification Committee, will undergo training regarding the overall investigation and recall process and their attendant responsibilities.

The Recall Notification Committee will include the following positions:

- Recall Notification Coordinator (QAM)
- Recall Notification Communications Director (GM)
- Internal Recall Notification Team
    - Cultivation Manager
    - Inventory Control Manager
- External Recall Notification Team
    - Sales Team

Investigation Overview

The Recall Notification Committee will, within 24 hours of receipt, review any complaint regarding the quality or safety of Bask Ventures, Inc.'s cannabis. Any affected products and/or production batches remaining within the cultivation facility will be immediately identified. The Internal Recall Notification Team will cease production of the plants in question and locate and quarantine all affected plants within the facility until the source of the complaint or adverse event is identified, corrected, or otherwise resolved. The quarantined plants will be segregated physically from all other production within the facility and secured in a limited access area that is under constant video camera surveillance [16 CCR § 5044].

The Internal Recall Notification Team will investigate the records and circumstances of the production of the affected batch to determine if a voluntary or mandatory recall of cannabis is necessary or if any further action is required. If a deviation from SOPs in any phase of the cultivation or packaging of the specified cannabis at the facility has occurred, the Recall Notification Coordinator will investigate the circumstances of the deviation and record any relevant information that led to the deviation.

Each harvest batch of cannabis cultivated by Bask Ventures, Inc. will have at least two samples saved to facilitate immediate testing. The Internal Recall Notification Team will coordinate retrieving the samples from the pertinent retention batch to compare with each received complaint using Bask Ventures, Inc.'s rigorous internal quality standards. If the complaint cites adverse characteristics that should be verifiable through comparison to retention samples for the batch and Bask Ventures, Inc. is able to verify that the specimen selected from the retention samples for the batch exhibits the same adverse characteristics enumerated in the complaint, appropriate measures will be taken immediately. The retention samples will be sent to an independent laboratory to determine if they meet the specifications of the identified strain variety and will be tested for microbial contaminants, mycotoxins, foreign matter contamination, heavy metals, and pesticide and fertilizer residue.

If Bask Ventures, Inc. discovers that a condition relating to the cannabis cultivated at its facility poses a risk to public health and safety, Bask Ventures, Inc. will immediately notify the State by phone and send a written hard-copy and email notification. Bask Ventures, Inc. will secure, isolate, and prevent the distribution of the affected cannabis and any associated cannabis product.

Bask Ventures, Inc. will not destroy or otherwise legally dispose of the affected material(s) before notifying the State and coordinating its destruction and disposal.

Upon receipt of a complaint or notification of an adverse event, the Recall Notification Coordinator will;

- Review and investigate product complaints to determine whether they involve a possible failure of a product to meet any of its specifications, or any other requirements, including but not limited to those specifications and other requirements that, if not met, could result in a risk of illness or injury.
- Review and approve decisions about whether to investigate a product complaint and review and approve the findings and follow-up action of any investigation performed.
    - The review and investigation of the product complaint, review by quality control personnel about whether to investigate a product complaint, and the findings and follow-up action of any investigation performed, will extend to all related batches and relevant records.
    - Related batches may include, but are not limited to, batches of the same product, other batches processed on the same equipment or during the same time period, or other batches produced using the same batches or lots of components or packaging components.
- Create a written record of the complaint and details of any subsequent investigation, including:
    - Identity of the product;
    - Batch, lot, or other control number of the product;
    - Date the complaint was received and the name, address, or telephone number of the dispensary that received the complaint, if available;
    - Nature of the complaint including, if known, how the product was used; and
    - Names of the Recall Notification Committee members or quality control personnel who do the following:
        - Review the reason for the product return to a partner retail facility; and
        - Review and approve the findings and follow-up action of any investigation performed.
- Document the findings of the investigation and follow-up action(s) taken when an investigation is performed; and
- Create Bask Ventures, Inc.'s response to the complaint, if applicable.

Recall Notification Plan

Should an investigation determine there could be a potential adverse event related to the cannabis cultivated at the facility or upon receipt of a formal recall notification from the State, the Recall Notification Coordinator will initiate the Recall Notification Plan. The Recall Notification Coordinator will coordinate the execution of the recall process with cooperating manufacturers, distributors, and dispensaries as required until the recall is complete.

<u>Identifying Products for Recall Notification – Internal Recall Notification Team</u>

All cannabis packages and finished products have unique identification barcodes, or "unique identifiers" (UIDs), that allow any item to be immediately traced back to the cultivation facility

associated with specific harvest and production batches for efficient recall investigation [3 CCR § 8403].

Using the batch UID associated with the complaint, the California cannabis track and trace (CCTT) system can be searched to immediately identify all recorded characteristics of the affected batch, including the harvest date, total amount of cannabis harvested, all pesticides, nutrients, fertilizers and other active ingredients used during the cultivation, and the final destination of all affected products. Every package containing products from the suspected batch can be identified and communication with all possessing entities initiated within hours.

Once identified, all affected product, packaging and/or equipment (if applicable) used to cultivate or produce the cannabis in question will be quarantined and taken out of the production and supply chain. Plants and packages from the associated batch will be locked in the CCTT system so that no associated products can be electronically moved. The cultivation facility will cease shipment of all products, affected or not, for a minimum of 24 hours so that all affected products, packaging, equipment, etc. can be located and quarantined. Once this has been completed, the Internal Recall Notification Team will report the inventory of quarantined items to the Recall Notification Coordinator including product descriptions, production batch numbers, date of production, and quantities of quarantined items.

Should a recall be determined to be necessary, the Internal Recall Notification Team will coordinate with the Recall Notification Communications Director to report on details of all affected product, including:

- Product name,
- Batch number(s),
- Date(s) of production,
- Quantity produced,
- Quantity distributed,
- Date, time, and exact quantity of each affected product shipment accepted by any cannabis facility, and
- Name of person who accepted the delivery of affected product for each location.

Inventory Tracking of Recalls

Bask Ventures, Inc. will track all information relevant to a recall within the CCTT system. Internal storage and inventory control SOPs are designed to keep products organized and clearly labeled, allowing them to be quickly and easily identified. Accurate recordkeeping throughout the facility provides an overview of production dates, quantities, inventory levels, and product shipped.

As part of its regular inventory audits, Bask Ventures, Inc. will document the total amount of recalled cannabis plants or products, including type, form, batch number(s), and date and time of harvest. Bask Ventures, Inc. will keep an administrative record for any recalled cannabis by recording who received the recalled cannabis (i.e., manufacturer or dispensary) and the reason for the recall. Bask Ventures, Inc. will submit any proposed changes to its Recall Notification Plan to the Bureau at least sixty days before the effective date of the proposed changes.

Recall Notification Communications – External Recall Notification Team

The Recall Notification Coordinator will coordinate with the External Recall Notification Team to complete the necessary notification of all affected parties. Location of affected production batches and products will be identified through the CCTT system by the External Recall Notification Team. Production logs, internal invoices, transport manifests and shipping logs will be utilized to double check the accuracy of the CCTT system.

The Inventory Control Manager will keep hard copies of all transport manifests and ensure the electronic transport manifest records within the CCTT system are current and accurate. The contact information for every cannabis facility that Bask Ventures, Inc. has had product shipped to within the past year will be regularly maintained.

Depending on the nature of the recall, affected cannabis facilities will be instructed to quarantine all products associated with the identified batch number; Bask Ventures, Inc. will clearly state to its partners that the products are not to be sold, distributed, or to leave their facility for any reason until further testing is completed and the recall finalized or dismissed. Should a recall investigation require the disposal of affected cannabis, the purchasing facility will be notified to complete destruction and disposal of the quarantined product.

The Recall Notification Communications Director will directly contact via phone and through email every cannabis facility that received affected product providing the specific details of shipment(s) to each, including:

- Description of the complaint,
- Name of affected product(s),
- Production batch number(s),
- Date(s) of production,
- Date(s) and time(s) of delivery of affected product,
- Exact quantity of affected product shipped and accepted by the cannabis facility,
- Name of person(s) who accepted and signed for the delivery of affected product,
- Instructions to quarantine the product and prepare for destruction and disposal of the affected product.

Manufacturers will be instructed to notify any dispensaries who purchased product that contained the affected cannabis. Dispensaries will be instructed to phone and email customers who have purchased any of the affected products.

As necessary, the Recall Notification Communications Director will use press releases and other appropriate public notifications to ensure that retail customers (and patients and caregivers, if applicable) are notified of the recall as soon as possible and to issue updates throughout the recall process. Cannabis facilities will be issued electronic copies of the press release to post, email and distribute to their consumer base (both medical and retail).

Key Recall Contacts

Regulatory Agencies

Bureau of Cannabis Control (CDCA)
CalCannabis (CDFS)

Manufactured Cannabis Safety Branch (CDPH)
Local Health Department
Local Law Enforcement

Technical Consultants
Testing Laboratory
Food Safety Consultants
Sanitation Consultants
Legal Counsel

Distribution Chain
Third Party Transportation Services
Cannabis Facilities (processors, manufacturers, dispensaries)

The GM will be the designated point of contact with the Bureau. If the recall was not initiated by the State, but by Bask Ventures, Inc., the agencies will be notified via phone and email immediately upon receipt of the compliant and again once the Recall Notification Committee has determined whether a recall is necessary. Detailed explanation on any decision will be provided via email and sent by certified mail within 24 hours of the initial complaint.

The agencies will be contacted and provided with key information throughout the recall process. The Recall Notification Coordinator will be available 24 hours a day during the recall effort.

Transportation of Potentially Affected Cannabis
If samples are to be sent to a cannabis testing lab the ICM will assist the Recall Notification Coordinator by creating transport manifests for each shipment. The transport manifest will be transmitted to the cannabis testing laboratory, transporting distributor, and to the State before the close of business the day prior to contracted transport.

Quarantine and Disposal of Recalled Cannabis
The Recall Notification Coordinator will oversee destruction of all recalled products, if appropriate. Purchasing processors, manufacturers, and dispensaries will be notified to complete destruction of delivered packages and finished products associated with a quarantined batch.

All affected cannabis plants will be uniquely classified in the CCTT system and physically segregated within the cultivation facility as they are identified. The recalled cannabis will be quarantined in a secure, limited access storage area under constant video camera surveillance until it is properly disposed of. Access to the quarantined room will be limited to the GM, ICM, and QAM; a minimum of two personnel will be required to access the quarantine room. Recalled items will be conspicuously labelled, "QUARANTINED PRODUCT – DO NOT USE OR SELL."

Once it is confirmed that every effort has been taken to ensure that the affected cannabis is under quarantine, Bask Ventures, Inc. will notify the State and coordinate the destruction and disposal of the recalled cannabis. Unless otherwise directed by the State, Bask Ventures, Inc.'s standard Waste Disposal Management SOPs will be followed. Details of the destruction and disposal of

affected product will be tracked manually on the Waste Disposal Log, updated in the CCTT system as it is completed, and included in a recall notification Summary Report submitted to the State.

Summary Report

Upon completion of a recall the following information will be summarized and submitted to the State. Recalled inventory data will be entered into the CCTT system where appropriate:

- The reason for the recall notification;
- The name of the Recall Notification Coordinator;
- The total amount of recalled cannabis, including types, forms, batches, and lots;
- The number of recalled samples, types, batches and lots, if applicable, sent to laboratories, the names and addresses of the laboratories, the dates of testing and the results by sample;
- The manner of disposal of the recalled cannabis, including:
    - The name of the individual overseeing the disposal of the recalled cannabis,
    - The name of the disposal company, if applicable,
    - The method of disposal,
    - The date of disposal, and
    - The amount disposed of by types, batches and lots, if applicable; and
- Any other information required by the State.

Experience in Cultivation: Medicine Man Technologies

In order to demonstrate experience with the cultivation of cannabis, Bask Ventures, Inc. will rely on the expertise of their selected cultivation consultant, Medicine Man Technologies. Medicine Man Technologies (symbol: MDCL), a Nevada C Corporation, bases its cannabis cultivation experience on its relationships with Futurevision LTD, dba Medicine Man Production Corporation, and Pono Publications, dba Three-A-Light, both Colorado Corporations. Medicine Man Production Corporation is a licensed Tier 3 cultivator in Colorado, growing both medical and adult-use cannabis for patients and consumers within a 40,000-square foot industrial facility in Denver, CO. Three-A-Light is a proprietary cultivation methodology that enables operators to reliably produce three pounds of dried, cured cannabis per 1000W light fixture; an industry-leading measure of productivity for indoor cultivators.

Medicine Man Technologies entered into an IP/License agreement with Medicine Man Production Corporation in 2013. This license agreement entitles Medicine Man Technologies to sub-license Medicine Man Production Corporation's state of the art cultivation methods and best practices, including facility design, commercial cultivation standard operating procedures (SOPs), and operation expertise to cannabis cultivators throughout the US. Subsequently, through the consulting arrangement with Medicine Man Technologies, Bask Ventures, Inc. will gain access to their proven commercial cultivation methods and best practices. Furthermore, through this arrangement, Bask Ventures, Inc. will coordinate live training and development with Medicine Man Technologies. Over a 2-year period the client will have access to Medicine Man for continued support.

Medicine Man Production Corporation has cultivated cannabis on a commercial scale since 2009. Medicine Man is a true pioneer in commercial cannabis production and retail. Having started in "The Golden Age" of the industry, they have made all the mistakes that could be made. Years of time, energy, and capital have been invested in the research and development that has made Medicine Man the success that it is today. They currently operate an industrial cultivation facility with an approximate 43,000 square foot cultivation area utilizing a three-phase power service. Regarded as an industry leading, highly-efficient cultivator, Medicine Man Production Corporation has improved its productivity and yields of high quality cannabis at its facility year over year. In fiscal year 2016, Medicine Man Production Corporation produced 6,958 pounds of cannabis; 5,607 pounds of dried, cured flower and 1,351 pounds trim plant material. Each pound of cannabis was part of a larger batch required to undergo independent third-party lab testing to validate its quality before being introduced into the marketplace.

Through the sub-licensing agreement between Bask Ventures, Inc. and Medicine Man Technologies, including the dissemination of technical data, designs, and operating procedures, Bask Ventures, Inc. will be able to eliminate the costly mistakes of learning how to cultivate cannabis on a commercial scale. This will provide speed to market advantages for the company as well as an ongoing support mechanism in the event of a system or process failure requiring expert consulting to remedy.

In early 2017, Medicine Man Technologies acquired Pono Publications, dba Three-A-Light, allowing Medicine Man Technologies to provide Bask Ventures, Inc. with Three-A-Light's revolutionary process for cultivating cannabis. The process is based on proprietary tending and

feeding practices designed to maximize plant output, creating high yields with lower overhead than competing methods.

The process of cultivating cannabis is time intensive, with the full plant life cycle taking over five months from clone to cure. Each step in the cultivation process contains a series of critical steps that must be carefully followed in order to produce high-quality, consistent plant material. As a result of the consulting relationship with Medicine Man Technologies, Bask Ventures, Inc. will have access to proven SOPs that outline, in detail, each step of the cultivation process. Once adapted to be compliant with local regulations, these SOPs will outline the following for Bask Ventures, Inc.'s cultivation team:

- All required regulatory references.
- Related documents, including forms, checklists, and logs.
- List of equipment used in the process, including specifications and images.
- The purpose of the policy, including a clear summary of the SOP and the associated company policy for proper execution.
- Required staffing and tasking assignments.
- The process workflow outlined in step-by-step chronological manner, including a very detailed description of the procedures and sub-procedures within the process. Supplemental items include narratives, videos, images, diagrams, graphs, charts, photos, process-flow, and floorplans.
- Management and employee sign-off, noting the fulfillment of training and understanding of the SOP for personnel files.

Cultivation SOPs to be made available to Bask Ventures, Inc.:

- Cleaning Grow Pots, Trays, Buckets, and Domes
- Cloning
- Clone Maintenance
- Curing
- Drying
- Harvesting Plants
- Integrated Pest Management
- Netting Flower Tables
- Prepping Nutrient Troughs
- Recall Procedures
- Receiving Products
- Room Sanitation Practices
- Shipping Products
- Topping and Pruning Vegetative Plants
- Transplanting
- Trim Machine Cleaning
- Trimming
- Waste Disposal
- Watering Flower Rooms
- Watering Vegetative Plants

Likelihood of Success

Bask Ventures, Inc. understands that operating a successful commercial cannabis facility requires the ability to consistently and efficiently cultivate high quality cannabis, paying the utmost attention to consumer, public, and product safety. Bask Ventures, Inc. will deploy production control measures that allow for flexible scalability, increasing or decreasing production promptly and efficiently to meet consumer demand. Bask Ventures, Inc. has identified the following potential risk factors of operating a cultivation facility:

- High cost of facility buildout, including: construction materials, cultivation equipment, electrical gear, mechanical gear, utility upgrades, contract labor, etc.;
- Lack of hands-on commercial cultivation experience within the ownership group;
- Lack of proven commercial cultivation standard operating procedures; and
- Potential shortage of locally trained workforce.

To minimize these risk factors and improve likelihood of success, Bask Ventures, Inc. vetted leading industry operators and consultants from US state markets with comparable legal cannabis programs. Bask Ventures, Inc. sought out licensed operators who have demonstrated proven operational success, along with the ability to address the mitigation of the aforementioned risk factors. As it may take several years to acquire and maintain licensing, compliance, and demonstrate operational proficiency within a state cannabis program, there were few qualified candidates who met Bask Ventures, Inc.'s criteria. Upon review, Bask Ventures, Inc. selected Medicine Man Technologies, a Denver-based cannabis consultancy who, through their relationship with Medicine Man Production Company, has obtained the right to license their proven cultivation methods to new operators. The formal consulting relationship enables Medicine Man Technologies to function as Bask Ventures, Inc.'s cultivation advisors through the application process, throughout the time frame necessary to become fully operational, and once operational as long as desired. In addition, the services rendered through the consulting agreement address the mitigation of primary risk factors faced by Bask Ventures, Inc., including:

- Services for cultivation facility design, equipment selection, and advisement for a local construction team (general contractor, architect, engineer, etc.);
- Transfer of technical data, including adoption and implementation of proven commercial cultivation methods and standard operating procedures;
- Training services, including hands-on commercial cultivation training for Bask Ventures, Inc. management and key employees; and
- Continued cultivation technical support for Bask Ventures, Inc. once operational.

Adoption of MMT's proven methodology will provide speed to market advantages that will ensure Bask Ventures, Inc. meets the needs of consumers as early as possible. The ability to replicate a proven, risk-averse, tightly controlled process will mitigate the costly mistakes faced by many new startups entering the commercial cannabis cultivation industry and enable Bask Ventures, Inc. to become a leader in the nascent marketplace.

Appendix A – Forms and Logs

Appendix A – Logs and Forms

MEDICINE MAN
TECHNOLOGIES

SOP Template

Document#	Title:	Print Date:
Revision # 1.0	Prepared By: Name	Date Prepared: MM/DD/YYYY
Effective Date:	Approved By:	Date Approved:

1. **Definitions:**
    a. List each industry- and company-specific term, acronym, or other information that isn't common knowledge, and include a brief description. If there is a legal definition within the regulations that affects this process, include it here as well.
2. **Purpose:**
    a. What is the objective of this SOP?
3. **Policy:**
    a. What is the standard this SOP must achieve or maintain?
4. **Health and Safety Risks:**
    a. Are there any potential health or safety risks associated with the procedure, such as chemical applications, machinery, or other hazards?
5. **Responsibilities:**
    a. Who is the primary person responsible for overseeing the task?
    b. Who is the primary person responsible for performing the task?
    c. Who is assigned as the backup in case one of the supervisors is unavailable?
    d. Who is assigned when one of the performers of the task is unavailable?
6. **Procedure:**
    a. Preparation and setup
        1. Equipment used:
            i.
        2. Equipment safety checks:
            i.
        3. Supplies used:
            i.
    b. Perform Procedure
7. **Quality Control**
    a. What steps can be taken to verify that the procedure is performed correctly?
8. **Records:**
    a. What logs or forms are required to be used with this procedure?
    b. Who is responsible for the records?
9. **References:**
    a. What regulation governs this process?
    b. What sources were used to create this procedure?
10. **Revision History:**

Revision #	Release Date	Description
1.0		Initial release

MEDICINE MAN
TECHNOLOGIES

Employee Continuing Education Log

SOP/CONT. ED. TITLE:
IN HOUSE or (LOCATION):

Trainee acknowledgement_____ Date_____
Supervisor acknowledges proficiency_____ Date_____

SOP/CONT. ED. TITLE:
IN HOUSE or (LOCATION):

Trainee acknowledgement_____ Date_____
Supervisor acknowledges proficiency_____ Date_____

SOP/CONT. ED. TITLE:
IN HOUSE or (LOCATION):

Trainee acknowledgement_____ Date_____
Supervisor acknowledges proficiency_____ Date_____

SOP/CONT. ED. TITLE:
IN HOUSE or (LOCATION):

Trainee acknowledgement_____ Date_____
Supervisor acknowledges proficiency_____ Date_____

SOP/CONT. ED. TITLE:
IN HOUSE or (LOCATION):

Trainee acknowledgement_____ Date_____
Supervisor acknowledges proficiency_____ Date_____

MEDICINE MAN
TECHNOLOGIES

Nutrient or Growth Additive Log Sheet

Date of Feeding:	March 20, 2017
Time Feeding Began:	11:30 AM
Time Feeding Ended:	12:30 PM
Location (Block/Room/Table #):	Block 1, Room 2, Tables A - D
Size of Area Treated:	400 sq. ft.
Product Name:	Sample Product
Total Amount Applied (Pound, Ounce, Gallon, Liter):	1.0 Ounce
Dosage or Rate of Feeding:	1.0 Ounce per 100 sq. ft.
Employee/Individual Printed Name:	John Smith
Employee ID #:	ID #123456

Sample Nutrient Feeding Schedule

Cloning Nutrients Feeding Schedule

pH - 6.2	Water Temp. - 68-70°F
Success Micro™	5.0ml / gal
Success Trees™	5.0ml / gal
Success Flowers™	5.0ml / gal
Success Blast Off™	1.5ml / gal
SUPERThrive®	1.3ml / gal
Success Balance™	7.5ml / gal

Early Vegetative Nutrients Feeding Schedule

pH - 6.2	Water Temp. - 68-70°F
Success Micro™	5.0ml / gal
Success Trees™	6.0ml / gal
Success Flowers™	4.0ml / gal
Success Blast Off™	1.2ml / gal
SUPERThrive®	1.2ml / gal
Success Balance™	7.5ml / gal

Mid Vegetative Nutrients Feeding Schedule

pH - 6.2	Water Temp. - 68-70°F
Success Micro™	10ml / gal
Success Trees™	13ml / gal
Success Flowers™	7.0ml / gal
Success Blast Off™	1.0ml / gal
SUPERThrive®	2.0ml / gal
Success Silica™	2.5ml / gal
Success Balance™	10ml / gal

Mid Vegetative "Flush" Nutrients Feeding Schedule

pH - 6.4	Water Temp. - 68-70°F
Success Blast Off™	0.8ml / gal
SUPERThrive®	2.5ml / gal
Success Sugar™	2.5ml / gal
Success Balance™	2.5ml / gal

Late Vegetative Nutrients Feeding Schedule

pH - 6.0-6.1	Water Temp. - 68-70°F
Success Micro™	10ml / gal
Success Trees™	15ml / gal
Success Flowers™	5ml / gal
Success Blast Off™	0.9ml / gal
SUPERThrive®	2.5ml / gal
Success Silica™	5.0ml / gal
SM-90™	1ml / gal
Success Balance™	10ml / gal

Late Vegetative "Flush" Nutrients Feeding Schedule

pH - 6.4	Water Temp. - 68-70°F
SUPERThrive®	2.5ml / gal
Success Sugar™	2.5ml / gal
Success Balance™	2.5ml / gal

Late Vegetative Transition Mix Final Nutrients Feeding Schedule

pH - 6.2	Water Temp. - 68-70°F
Success Micro™	10ml / gal
Success Trees™	10ml / gal

Success Flowers™	10ml / gal
Success Blast Off™	10ml / gal
SUPERThrive®	2.5ml / gal
Success Silica™	5.0ml / gal
Success Sugar™	10ml / gal
Success Balance™	10ml / gal

Day 1 Flower Nutrients Feeding Schedule

pH - 6.2	Water Temp. - 68-70°F
Success Micro™	10ml / gal
Success Trees™	12ml / gal
Success Flowers™	8.0ml / gal
Success Blast Off™	0.8ml / gal
Success Silica™	2.5ml / gal
Success Sugar™	10ml / gal
Success Balance™	10ml / gal

Day 5 Flower Nutrients Feeding Schedule

pH - 6.2	Water Temp. - 68-70°F
Success Micro™	10ml / gal
Success Flowers™	12.5ml / gal
Success Trees™	7.5ml / gal
Success Blast Off™	0.9ml / gal
Success Silica™	2.5ml / gal
Success Sugar™	10ml / gal
Success Balance™	10ml / gal

Day 8 Flower Nutrients Feeding Schedule

pH - 6.2	Water Temp. - 68-70°F
Success Micro™	10ml / gal
Success Flowers™	12.5ml / gal
Success Trees™	7.5ml / gal
Success Blast Off™	1.0ml / gal
Success Silica™	2.5ml / gal
Success Sugar™	10ml / gal
Success Balance™	10ml / gal

Day 11 Flower Nutrients Feeding Schedule

pH - 6.4	Water Temp. - 68-70°F
Success Blast Off™	0.8ml / gal
Success Flame™	0.8ml / gal
Success Sugar™	12ml / gal
Success Balance™	8.5ml / gal

Day 14 Flower Nutrients Feeding Schedule

pH - 6.2	Water Temp. - 68-70°F
Success Micro™	10ml / gal
Success Flowers™	13ml / gal
Success Trees™	7.0ml / gal
Success Blast Off™	1.0ml / gal
Super Silica™	12.5ml / gal
Success Flame™	1.0ml / gal
Success Sugar™	10ml / gal
Success Balance™	10ml / gal

Day 17 Flower Nutrients Feeding Schedule

pH - 6.2	Water Temp. - 68-70°F
Success Micro™	10ml / gal
Success Flowers™	13.5ml / gal
Success Trees™	6.5ml / gal
Success Blast Off™	0.8ml / gal
Super Silica™	2.5ml / gal
Success Flame™	1.5ml / gal
Success Sugar™	10ml / gal
Success Balance™	10ml / gal

Day 20 Flower Nutrients Feeding Schedule

pH - 6.2	Water Temp. - 68-70°F
Success Micro™	10ml / gal
Success Flowers™	14ml / gal
Success Trees™	7.0ml / gal
Success Silica™	2.5ml / gal
Super Flame™	2.5ml / gal
Success Sugar™	10ml / gal
Success Balance™	10ml / gal

Day 23 Flower "Flush" Nutrients Feeding Schedule

pH - 6.2	Water Temp. - 68-70°F
Success Flame™	3.0ml / gal
Success Sugar™	12ml / gal
Success Balance™	10ml / gal

Day 26 Flower Nutrients Feeding Schedule

pH - 6.2	Water Temp. - 68-70°F

Success Micro™	10ml / gal
Success Flowers™	14.5ml / gal
Success Trees™	5.5ml / gal
Success Silica™	2.5ml / gal
Success Flame™	0.3ml / gal
Success Sugar™	10ml / gal
Success Balance™	10ml / gal

Day 29 Flower Nutrients Feeding Schedule

pH - 6.3	Water Temp. - 68-70°F
Success Micro™	10ml / gal
Success Flowers™	15ml / gal
Success Trees™	5.0ml / gal
Success Silica™	2.5ml / gal
Success Flame™	3.5ml / gal
Success Sugar™	10ml / gal
Success Balance™	10ml / gal

Day 31 Flower "Flush" Nutrients Feeding Schedule

pH - 6.5	Water Temp. - 68-70°F
Success Micro™	4.5ml / gal
Success Flowers™	12ml / gal
Success Trees™	10ml / gal

Day 34 Flower Nutrients Feeding Schedule

pH - 6.3	Water Temp. - 68-70°F
Success Micro™	10ml / gal
Success Flowers™	15ml / gal

Success Trees™	5.0ml / gal
Success Silica™	2.5ml / gal
Success Flame™	4.5ml / gal
Success Sugar™	10ml / gal
Success Balance™	10ml / gal

Day 36 Flower Nutrients Feeding Schedule

pH - 6.3	Water Temp. - 68-70°F
Success Micro™	10ml / gal
Success Flowers™	15ml / gal
Success Trees™	5.0ml / gal
Success Silica™	2.5ml / gal
Success Flame™	5.0ml / gal
Success Sugar™	10ml / gal
Success Balance™	10ml / gal

Day 38 Flower Nutrients Feeding Schedule

pH - 6.3	Water Temp. - 68-70°F
Success Micro™	10ml / gal
Success Flowers™	15ml / gal
Success Trees™	5.0ml / gal
Success Silica™	2.5ml / gal
Success Flame™	6.0ml / gal
Success Sugar™	10ml / gal
Success Balance™	10ml / gal

Day 40 Flower Nutrients Feeding Schedule

pH - 6.5	Water Temp. - 68-70°F

Success Flame™	6.0ml / gal
Success Sugar™	12ml / gal
Success Balance™	8.5ml / gal

Day 42 Flower Nutrients Feeding Schedule

pH - 6.3	Water Temp. - 68-70°F
Success Micro™	10ml / gal
Success Flowers™	15ml / gal
Success Trees™	5.0ml / gal
Success Silica™	2.5ml / gal
Success Flame™	6.0ml / gal
Success Sugar™	10ml / gal
Success Balance™	10ml / gal

Day 44 Flower Nutrients Feeding Schedule

pH - 6.4	Water Temp. - 68-70°F
Success Micro™	10ml / gal
Success Flowers™	15ml / gal
Success Trees™	5.0ml / gal
Success Silica™	2.5ml / gal
Success Flame™	4.0ml / gal
Success Game Time™	.24tsp / gal
Success Sugar™	10ml / gal
Success Balance™	10ml / gal

Day 46 Flower Nutrients Feeding Schedule

pH - 6.4	Water Temp. - 68-70°F
Success Micro™	10ml / gal

Success Flowers™	15ml / gal
Success Trees™	5.0ml / gal
Success Silica™	2.5ml / gal
Success Flame™	3.5ml / gal
Success Game Time™	.24tsp / gal
Success Honey™	10ml / gal
Success Balance™	10ml / gal

Day 48 Flower "Flush" Nutrients Feeding Schedule

pH - 6.5	Water Temp. - 68-70°F
Success Flame™	3.0ml / gal
Success Sugar™	12ml / gal
Success Game Time™	0.3tsp / gal
Success Balance™	8.5ml / gal

Day 50 Flower Nutrients Feeding Schedule

pH - 6.4	Water Temp. - 68-70°F
Success Micro™	10ml / gal
Success Flowers™	15ml / gal
Success Trees™	5.0ml / gal
Success Silica™	2.5ml / gal
Success Game Time™	0.3tsp / gal
Success Sugar™	10ml / gal
Success Balance™	10ml / gal

Day 52 Flower Nutrients Feeding Schedule

pH - 6.4	Water Temp. - 68-70°F
Success Micro™	10ml / gal

Success Flowers™	15.5ml / gal
Success Trees™	4.5ml / gal
Success Silica™	2.5ml / gal
Success Flame™	3.5ml / gal
Success Game Time™	.33tsp / gal
Success Sugar™	10ml / gal
Success Balance™	10ml / gal

Day 54 Flower "Flush" Nutrients Feeding Schedule

pH - 6.5	Water Temp. - 68-70°F
Success Sugar™	12ml / gal
Success Game Time™	.42tsp / gal
Success Balance™	8.5ml / gal

Day 56 Flower Nutrients Feeding Schedule

pH - 6.4	Water Temp. - 68-70°F
Success Micro™	10ml / gal
Success Flowers™	15.5ml / gal
Success Trees™	4.5ml / gal
Success Silica™	2.5ml / gal
Success Game Time™	.39tsp / gal
Success Sugar™	10ml / gal
Success Balance™	10ml / gal

Day 58 Flower Nutrients Feeding Schedule

pH - 6.5	Water Temp. - 68-70°F
Success Micro™	10ml / gal
Success Flowers™	16ml / gal

Success Trees™	4.0ml / gal
Success Silica™	2.5ml / gal
Success Game Time™	.14tsp / gal
Success Sugar™	10ml / gal
Success Balance™	10ml / gal

Day 60 Flower "Flush" Nutrients Feeding Schedule

pH - 6.6	Water Temp. - 68-70°F
Success Sugar™	12.5ml / gal
Success Game Time™	0.16tsp / gal

Day 62 Flower "Flush" Nutrients Feeding Schedule

pH - 6.6	Water Temp. - 68-70°F
Success Sugar™	8.0ml / gal

Day 64 Flower "Flush" Nutrients Feeding Schedule

pH - 6.6	Water Temp. - 68-70°F
Success Sugar™	5.0ml / gal

Day 66 - 68 Flower "Flush" Nutrients Feeding Schedule

pH - 6.6	Water Temp. - 68-70°F
Success Sugar™	3.0ml / gal

MEDICINE MAN
TECHNOLOGIES

Pesticide Application Log Sheet

Date of Application	March 20, 2017
Time Application Began	11:30 AM
Time Application Ended	2:30 PM
Application Method	□ Ground □ Air □ Fume □ Other
Site Identification Number(s)	1234-B
Building Location (Block/Room/Table #)	Block 1, Room 2, Tables A - D
Size of Area Treated	400 sq. ft.
Product Name	Sample Product
EPA/DPR Product Registration Number	Product #12345-6
Total Amount Applied (Pound, Ounce, Gallon, Liter)	4.0 Gallons
Dosage or Rate of Application	1.0 Gallon per 100 sq. ft.
Applicator/Individual Printed Name	John Smith
Applicator Certification #	Certification #123456

Examples of Integrated Pest Management (IPM) Protocols

Four common pathogens and pests dealt with in a medical marijuana cultivation facility are mites, aphids, thrips and powdery mildew. Below is a sample IPM schedule for each:

Example IPM Schedule for Mite Treatment

Mites - Flower Day 1-28

Treatment	**Quantity**
Neem Oil	2 oz / 1 gal Deionized Water
Organic Wetting Agent	2 ml / gal

Instructions: Spray this every 4 days until no mites are present. Make sure to get complete coverage, top and bottoms of leaves.

Mites - Flower Day 1-21

Treatment	**Quantity**
Rosemary Oil	2 oz / gal

Instructions: Alternate this on the allowable days with neem every 4 days until mites are no longer present.

Mites - Flower Day 29-Harvest

Treatment	**Quantity**
Soybean Oil	1 oz / gal

Instructions: Spray this every 3 days until mites are no longer present. Make sure to get complete coverage, top and bottom of leaves.

Mites - Vegetative

Treatment	**Quantity**
Pyrethrins	5 ml / gal
Lemon & Neem Oil	30 ml / gal

Instructions: Complete coverage, tops and bottoms of leaves. Once a week until mites are gone.

Mites - Vegetative

Treatment	**Quantity**
Neem Oil	2 oz / gal
Organic Wetting Agent	2 ml / gal

Instructions: Spray 3 days after the Pyrethrins and Lemon and Neem Oil treatment.

Example IPM Schedule for Powdery Mildew Treatment

Powdery Mildew - Flower Day 1 - 40

Treatment	**Quantity**
Potassium Sorbate	6 oz / gal

Instructions: Spray once a week getting complete coverage.

Powdery Mildew - Flower Day 1 - 40

Treatment	**Quantity**
Soybean Oil	1 oz / gal

Instructions: Spray 3 days after Potassium Sorbate treatment.

Powdery Mildew - Flower Day 42 - Harvest

Treatment	Quantity
Soybean Oil	15 ml / gal

Instructions: Spray every 3 days until powdery has been eliminated.

Powdery Mildew - Vegetative

Treatment	Quantity
Neem Oil	2 oz / gal
Organic Wetting Agent	2 ml / gal

Instructions: Spray every 4 days.

Example IPM Schedule for Thrip Treatment

Thrips - Flower Day 1 - 40

Treatment	Quantity
Potassium Sorbate	6 oz / gal

Instructions: Spray once a week. Spray top and bottoms of leaves plus top of soil. Place sticky traps under canopy.

Thrips - Flower Day 1 - 40

Treatment	Quantity
Soybean Oil	30 ml / gal

Instructions: Spray 3 days from the Potassium Sorbate application. Spray top and bottoms of leaves plus top of soil. Place sticky traps under canopy.

Thrips - Flower Day 41 - Harvest

Treatment	Quantity
Soybean Oil	5 ml / gal

Instructions: Use in extreme situations only. Only apply once a week. Spray top and bottoms of leaves plus top of soil. Place sticky traps under canopy.

Thrips - Vegetative

Treatment	Quantity
Pyrethrins	5 ml / gal
Lemon & Neem Oil	1.5 oz / gal

Instructions: Apply once a week. Spray top and bottoms of leaves plus top of soil. Place sticky traps under canopy.

Thrips - Vegetative

Treatment	Quantity
Neem Oil	2 oz / gal
Organic Wetting Agent	2 ml / gal
Rosemary Oil	2 oz / gal

Instructions: Alternate the following every 3 days. Spray top and bottoms of leaves plus top of soil. Place sticky traps under canopy.

Example IPM Schedule for Aphid Treatment

Aphids - Flower Day 1 - 28

Treatment	**Quantity**
Neem Oil	2 oz / gal
Organic Wetting Agent	2 ml / gal

Instructions: Apply once a week. On all applications spray top and bottom of leaves, plus top of soil. Put sticky traps up by lights.

Aphids - Flower Day 1 - 40

Treatment	**Quantity**
Potassium Sorbate	6 oz / gal

Instructions: Apply 3 days after Neem Oil. On all applications spray top and bottom of leaves, plus top of soil. Put sticky traps up by lights.

Aphids - Flower Day 41 - Harvest

Treatment	**Quantity**
Soybean Oil	1 oz / gal

Instructions: Apply once a week. On all applications spray top and bottom of leaves, plus top of soil. Put sticky traps up by lights.

Aphids - Flower Day 1 - 30

Treatment	**Quantity**
Rosemary Oil	5 ml / gal

Instructions: Do a drench once a week.

Aphids - Vegetative

Treatment	**Quantity**
Pyrethrins	5 ml / gal
Rosemary Oil	2 oz / gal

Instructions: Apply once a week. On all applications spray top and bottom of leaves, plus top of soil. Put sticky traps up by lights.

Aphids - Vegetative

Treatment	**Quantity**
Neem Oil	2 oz / gal
Organic Wetting Agent	2 ml / gal
Rosemary Oil	2 oz / gal

Instructions: Alternate every 3 days

Aphids - Vegetative

Treatment	**Quantity**
Pyrethrins	1 quart/per 100 gals (nutrients can be added)
Organic Wetting Agent	2 ml / gal
Rosemary Oil	2 oz / gal

Instructions: This is a drench. Do not get run off. Apply twice a week for 3 weeks. 2 days after application water with nutrients.

Aphids - Vegetative

Treatment	**Quantity**
Rosemary Oil	5 ml /gal

Instructions: This is a drench. Do not get run off. Apply once a week after the Pyrethrins application. Do this for two weeks and then switch back to the Pyrethrins treatment.

MEDICINE MAN
TECHNOLOGIES

Incident Report

Name: _____
Date: _____ Time: _____
Type of incident: _____
Person(s) involved: _____
Location of incident: _____

Description of Incident

_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____

Was an outside agency notified? (police, paramedics, CalCannabis) YES:__ NO:__
If yes, please provide contact information for that agency (police report #, paramedic contact information, agent name or phone number, or similar such information):

_____
_____
_____

Contact Information and Signature
I (name)_____ acknowledge this statement is true to the best of my recollection, signed _____. If farther information is required I can be reached at my phone number_____ ,my email address _____, or my place of residence at _____.

Appendix B - Cultivation Equipment List

Flower Room Lighting

All in-one Hydroponic Grow Room Environmental Controller

Manufacturer: Corporation Intelligent Controls

Model: iPonic 624

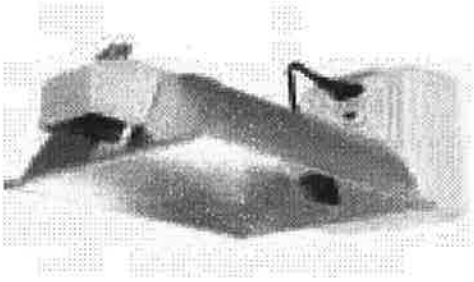
Est. Cost: $1,700-$1,800

Phantom Commercial DE Enclosed Lighting System 208/240V (flowering hood)

Ballast Model#: PHB5015

Reflector Model#: DE1000Zh

Estimated Cost: $400-$450



AutoPilot PX1 Digital Lighting Controller (Phantom)

Estimated Cost: $200-$250

Vegetative Room Lighting

Galaxy 902220 Grow Amp Ballast 1000 Watt 600/750/1000/Turbo Charge 120/240 Volt (flowering and Vegetative Ballast)

Est. Cost: $165

Product #: 902220

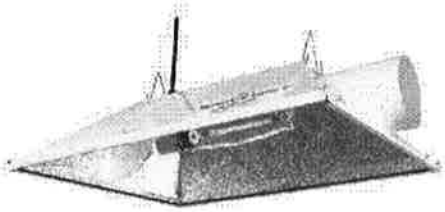
https://www.amazon.com/Galaxy-902220-Ballast-Turbo-Charge/dp/B00KMACPW4

Sun System Magnum Air-Cooled Reflector, 3X-Large to 8"

Est. Cost: $240

Product #: 904515

https://www.amazon.com/Sun-System-Air-Cooled-Reflector-3X-Large/dp/B003GF0W04

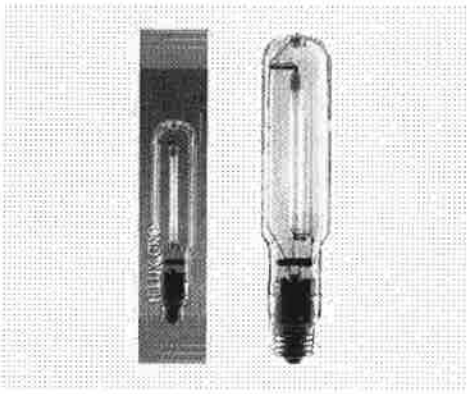


Ushio US5001671 Enhanced Performance HPS Lamp

Est. Cost: $70

Product #: 5001671

https://www.amazon.com/Ushio-US5001671-Enhanced-Performance-1000-watt/dp/B009D4JUIW

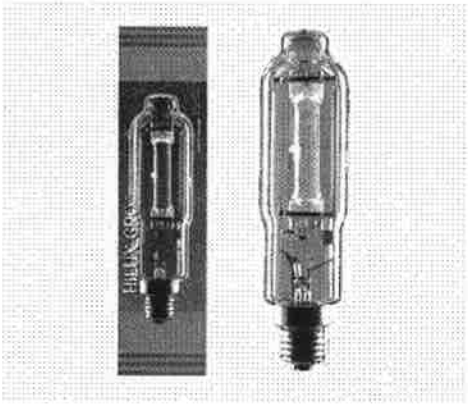


Ushio US5001673 Conversion Lamp, 1000-watt, Opti Blue (Veg Bulb)

Est. Cost: $92

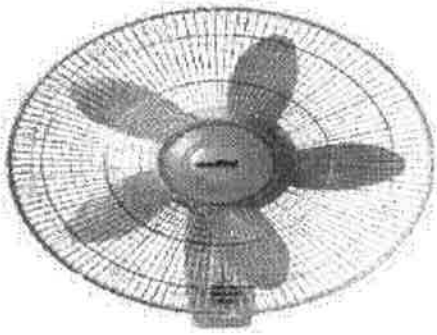
Product #: 5001673

cei



Air King 9018 Commercial Grade Oscillating Wall Mount Fan, 18-Inch (mounted inside flower rooms)

Est. Cost: $60

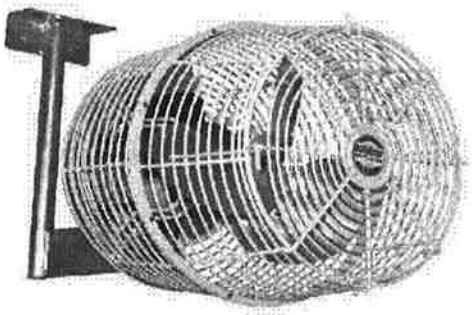


J&D Manufacturing Green Breeze HAF Fans

Product #: 226787

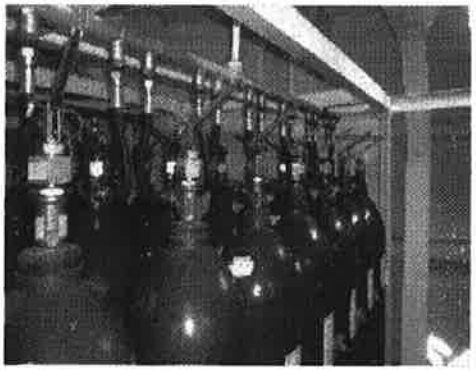
Est. Cost: $165

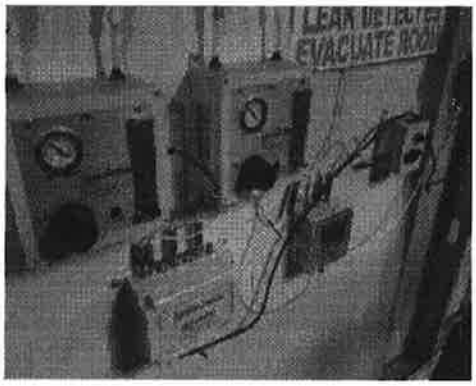
http://www.gemplers.com/product/226787/Green-Breeze-HAF-Fans



CO2 Emitting/Regulating System

GreenCO2 Systems or equivalent operator in your area. Please see GreenCO2 System quote (in Drive Folder) for equipment specs for comparison on whether to purchase or rent equipment



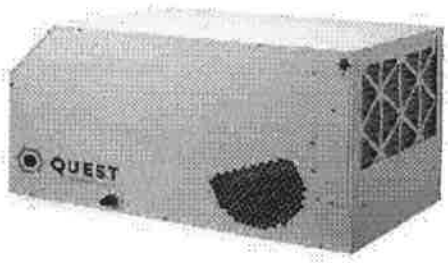


Commercial Dehumidifiers

Manufacturer: Quest Dehumidifiers

Model: Quest Duel 215

Est. Cost: $3,150.00

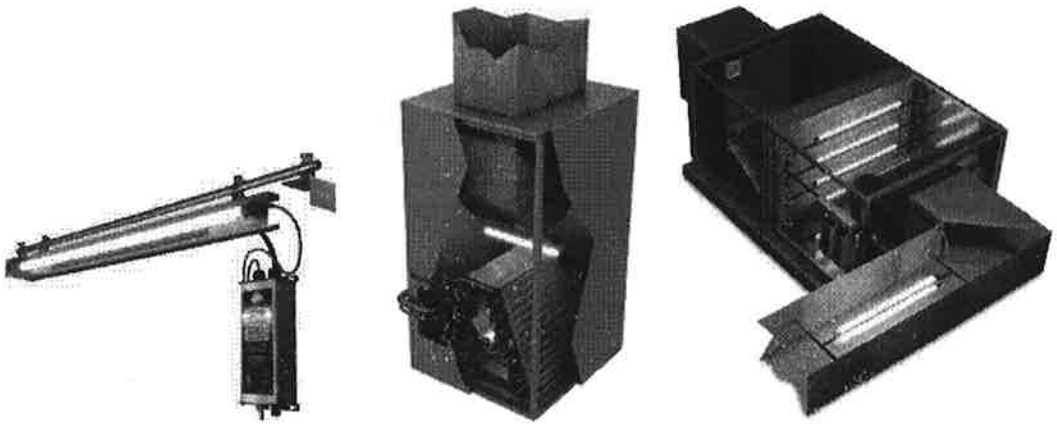


Fresh-Aire UV-C/UVGI system (or similar brand, unless pre-installed)

Model#: Depends on HVAC installed (May consider HVAC that includes UV-C)

Est. Cost: Depends on HVAC installed (May consider HVAC that includes UV-C)

https://www.freshaireuv.com/assets/assets-public/assets-commercial.html#cs-1



Extech HD400-NIST Heavy Duty Light Meter with NIST Calibration (Tests the effectiveness (Lumen output/brightness) of grow bulbs to ensure replacement when necessary)

Est. Cost: $350

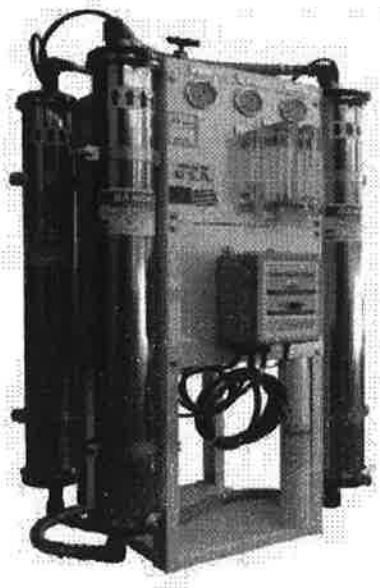
General Cultivation Equipment

3,000 Gallon Per Day Reverse Osmosis system

Manufacturer: Newterra (Crane Environmental)

Manufacturer#: **EPRO-3000**

Est. Cost: $7,495.95



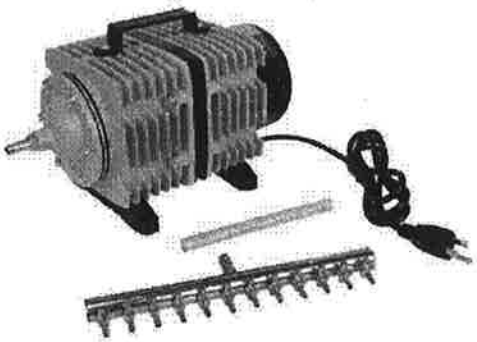
Ameriwater Silex Deionized Water Filtration Attachment

Product #: BZ10119381

Est. Cost: $1600

Active Aqua Commercial Air Pump 12 Outlet (AAPA110L)

Est. Cost: $75-$85



Active Aqua Air Stones Large 4" Cylinder

Est. Cost: $4.50-$6.50

CAN 125 Carbon Filter (Scrubbing Air)

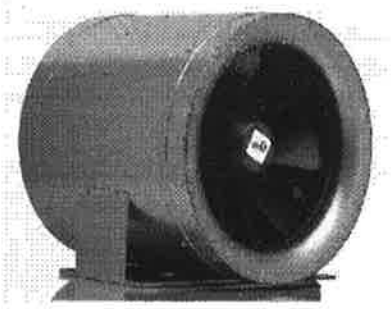
http://canfilters.com/can-filter-125.html?geoip_country=CA

Est Cost $395 (CAN)

CAN 14" MAX-FAN (Centrifugal Fan for recirculated air scrubbing or evacuation)

http://canfilters.com/14-ho-max-fan-the-beast-3343-cfm-240-volt.html

Est Cost $1050 (CAN)

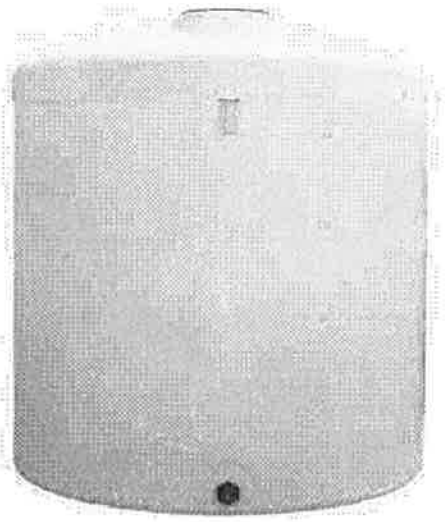


3000 Gallon Norwesco White Vertical Storage Tank

Model#: 40754

Manufacturer: Norwesco

Est. Cost: $1,650



Elkay Foodservice Products Sinks

Product #: (many designs and styles to choose from)

Est. Cost: $400-$700

https://www.google.com/#q=elkay+foodservice+products&tbm=shop&*

Crane Scale 300kg/600lbs

UPC:761460016917

Est. Cost: $50

ECOPOLYBLEND Spill Tray (for large Rockwool veg plants)

Manufacturer: JustRite

Model#: 28717

Est. Cost: $50

Pallet Jack

Uline Pallet Truck Standard Fork

Model#: H-1043

Est. Cost: $300

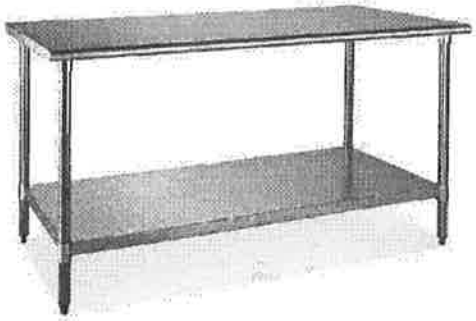
5500 lbs Capacity, 48" Length x 27" Width Fork

Stainless Steel Worktable (For Mixing Nutrients, Potting Plants, Trimming, Cure Room)

Manufacturer: Regencey

Model#: 600T3072G

Est. Cost: $200



Speakman Eyesaver Service Sink Faucet with Fixed Mount Eyewash, SEF-9000-FM

Est. Cost: $465

Chapin 63985 4-Gallon Wide Mouth 20V Battery Backpack (for spraying Pesticides/Fungicides)

Est. Cost: $134

VIVOSUN 19 LED Headlamp High Intensity Green Head Lamp (for entering dark rooms without interrupting plants)

Est. Cost: $12

Green Hornet Night Light 480 Lumens LED Bright

Est. Cost $120

ProWorks GrizzlyNite exam grade Nitrile Rubber Gloves

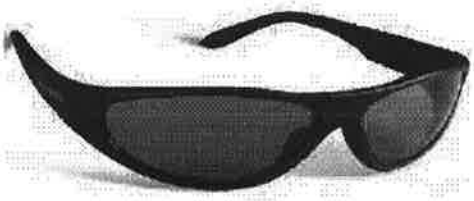
Est Cost: $10 (per box of 100)

HydroFarm Precision Pruner With Holster (all growers, trimmers, and cure personnel)

Est. Cost: $10

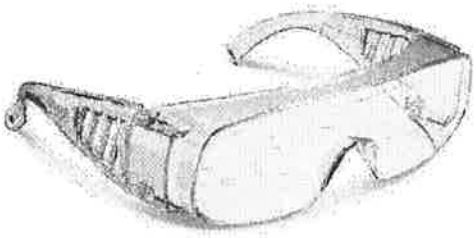
VIVOSUN Indoor Hydroponics Grow Light Room Glasses Goggles Anti UV for HPS MH
(Protect eyes while in grow rooms)

Est. Cost: $20



Uline - Visitor Specs (Safety glasses for spraying pesticides)

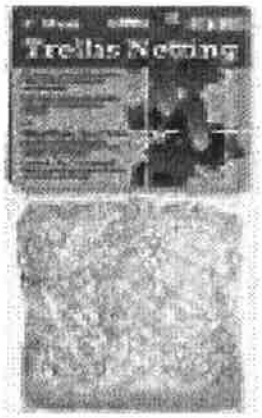
Est. Cost: $2 each



Employee Uniform Provider (Many Providers and Uniform Options)

Hydrofarm Trellis Netting, 5' x 30', 6" Mesh (netting flowering plants)

Est. Cost: $15



Craftsman Adjustable Pneumatic Mechanic Swivel Seat

Product #: C-3001

Est. Cost: $35

http://www.sears.com/craftman-craftsman-adjustable-pneumatic-mechanics-swivel-seat/p-00950604000P?sid=IDx01192011x000001&gclid=CKPezs3Ex9ICFdW6wAod29YClA&gclsrc=aw.ds

Brute Rubbermaid 55gal Trash Cans (for trash and transporting plant runoff water)

Est. Cost: $75

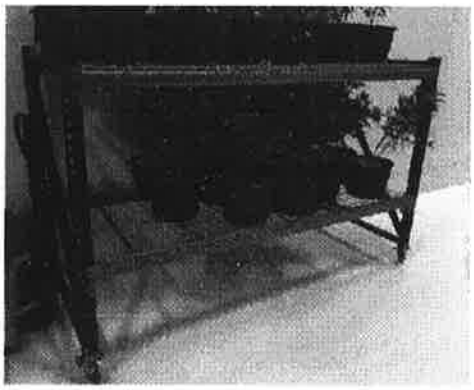
Rubbermaid 50gal Trash Can with Wheels (for trim to place discarded stems, stalks, and leaves)

Drill holes to keep moisture from the trim from building up.

Est. Cost: $115

Custom Made Plant Transport Cart

Common industrial Shelving materials with heavy duty casters mounted on bottom. Depending on your facility design and hallway widths the size and or necessity for such a cart will vary.



Nutrients

Success Base Nutrients:

Trees, Micro, Flowers

Success Nutrients Supplements:

Silica, Fire, Sugar, Balance, Game Time, Blast off

Additional Nutrient Additives:

Superthrive, Cyco Ryzofuel

Grow Medium Inoculants: (Add during transplant into promix)

Xtreme Gardening Mykos, Xtreme Gardening Azos (Large 8lb bags)

Cloning Solution: (soaking rockwool and dipping clones)

Clonex Clone Solution, Clonex Gel

Watering Equipment

BlueLab PH + PPM/EC Pen (1 set per water station)

Est. Cost: $140

BlueLab Pro care kit PH+Conductivity (1 set per water station)

Est. Cost: $20

BlueLab 7.0 PH Calibration Solution

Est. Cost: $22

BlueLab 4.0 PH Calibration Solution

Est. Cost: $15

55 Gallon Plastic Drum (Nutrient Mixing)

Manufacturer - Uline

Model# - S-9945BLU

Price $70

Bosch Commercial Garden hose 3/4inch 75ft (for watering)

Est Cost: $40

Mondi MONDIPUMP Utility and Sump Pump

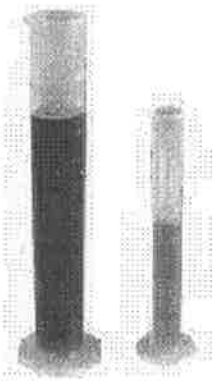
Est Cost: $170

https://www.amazon.ca/Mondi-MONDIPUMP-Utility-Sump-Pump/dp/B008UFB5YM

DRAMM Commercial-grade 30" Aluminum Rain Wand (for watering)

Est Cost: $35

500ml Polypropylene Graduated Cylinder



4 Quart Plastic Measuring Cup

2000 ml Short Form Polypropylene Pitcher

Grow Media

7 Gallon Grow Pots

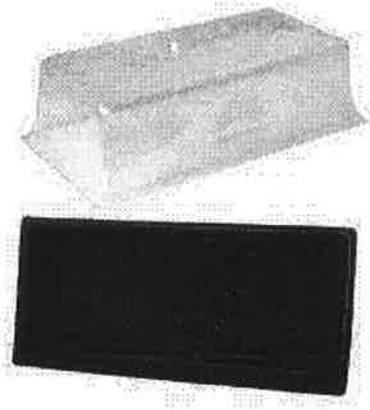
Manufacturer: Anderson Die & MFG. CO

Polycan #7 Deep (7 gallon grow pot)

Model#2654

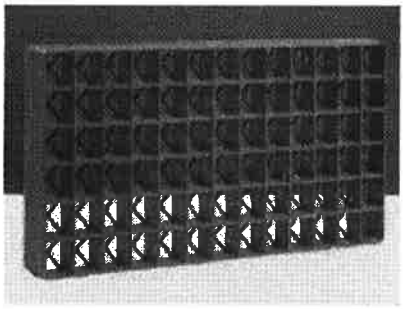
Clone Dome 10x20" with Clear Dome

Est. Cost: $25



Grodan Gro-Smart Tray Insert

Est. Cost: $15



Grodan 1.5" A OK Starter Plugs (For taking Clones)

Est. Cost: $4

Shot Glasses (pour Clonex gel into shot glass for dipping clones during cloning)

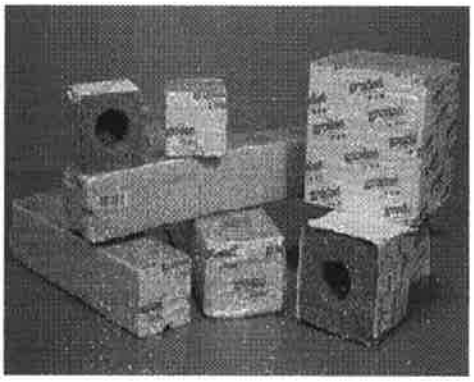
Any shot glasses will suffice

Grodan 4 x 4 Rockwool cubes

Product #: N/A

Est. Cost: $150

https://www.amazon.com/Grodan-Delta-Block-4x4x4-Case/dp/B009GJB3NY/ref=sr_1_2?s=arts-crafts&ie=UTF8&qid=1499797284&sr=1-2&keywords=grodan+4x4+block



PRO-MIX HP Mycorrhizae + Biofungicide, 3.8 cf (grow medium)

Est. Cost: $35

14 Gallon Steel Gray Rubbermaid

Est. Cost: $17

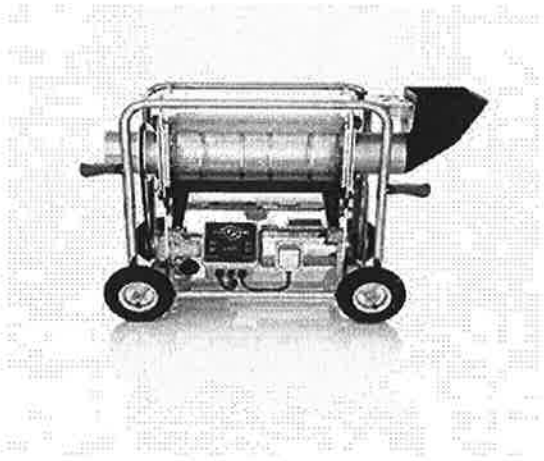
Rubbermaid 300 Gal. Stock Tank (For Mixing Pro-mix)

Est. Cost: $337

Trim + Cure Equipment

Twister T2 Trim Machine

Brand = Twister



Price = $11,500

Twister Trim Saver

Model CS-18

Part # 23-0200

Price = $3,295

Steel Adjustable 53.74 Inch 4 Tier Wire Shelf Garage Storage Rack Unit

Product #: S-1500

Est Cost: $70

http://www.ebay.com/itm/like/112038451711?lpid=82&chn=ps&ul_noapp=true

Large Aluminum Chafing Dish Steam Pan (turkey tray) (for transporting flower from trim to dry)

Est Cost: $1.76 each

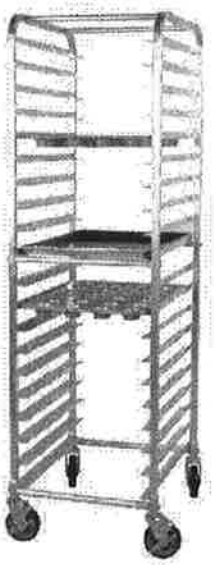
http://www.partycity.com/product/aluminum+chafing+dish+steam+pan+20in+x+12in+x+3in.do?sortby=ourPicks

Regency End Load Sheet Pan Rack with casters and 20 pans (Flower Drying Racks)

Model#: 600PR20316K

Est. Cost: $250.00

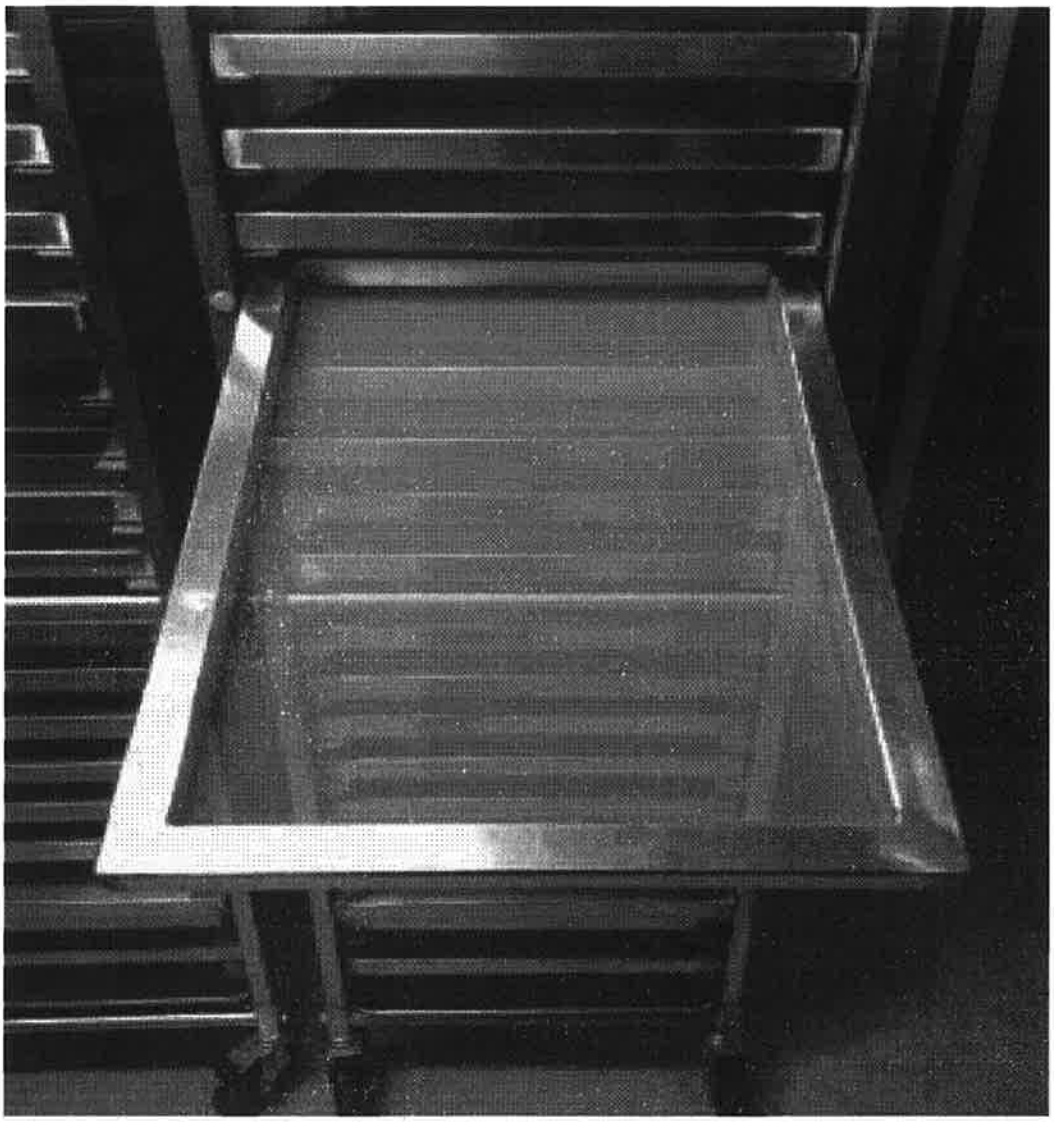
https://www.webstaurantstore.com/regency-20-pan-end-load-stainless-steel-bun-sheet-pan-rack-unassembled/600PR20316K.html



Screen Printing Frame Custom Made (Ryonet Screens made ours)

Aluminum 18 x 26 OD 24 White Mesh Tension 10-15 newtons

Ryonet Screens 1-800-314-6390 x159 Email: nstpierre@ryonet.com



FunkSac Curing and Storage Bags (also any other bag needs, packaging etc.)

Est. Cost: $300 per 1000 count box

http://www.funksac.com/

Sterlite 50 Gallon Stacker Tote (Place finished flower in FunkSak bags into totes)

Model#: 14899003

Est. Cost: $20

https://www.walmart.com/ip/Sterilite-50-gal-Stacker-Tote-Black/43393267?wmlspartner=wlpa&selectedSellerId=0&wl13=2752&adid=22222222227031287656&wl0=&wl1=g&wl2=c&wl3=53412275432&wl4=pla-111834288752&wl5=9028801&wl6=&wl7=&wl8=&wl9=pla&wl10=8175035&wl11=local&wl12=43393267&wl13=2752&veh=sem

Scales (for weighing finished product)

Manufacturer: A&D Company Limited

Model: FX-1200i

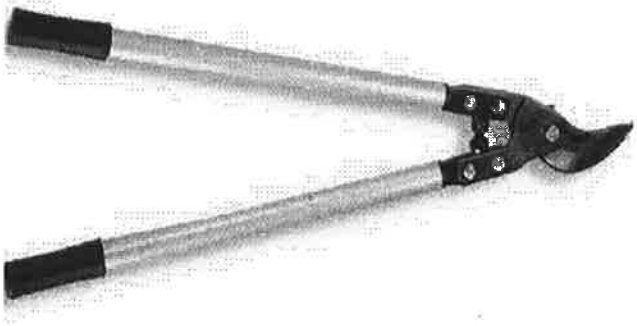
Est. Cost: $600

http://www.aandd.jp/products/weighing/balance/toploader/fz-i_fx-i.htm

Bahco Lopper, Heavy Duty 32 inch P19-80-F (For harvesting / cutting thick stalks)

Est. Cost: $110

http://www.forestry-suppliers.com/product_pages/Products.asp?mi=36661&itemnum=81087&redir=Y



Felco F-2 Classic Manual Hand Pruner

Est. Cost: $47

https://www.amazon.com/Felco-F-2-Classic-Manual-Pruner/dp/B00023RYS6/ref=pd_lpo_86_tr_img_3?_encoding=UTF8&psc=1&refRID=17TJ5V3F86VGTK6F3JEE

Yellow Sticky Aphid Whitefly Trap Pack (good indicators of pest outbreaks)

Manufacturer: SeaBright Laboratories

Est Cost: $15

Maintenance

Advance Adfinity 20D Floor Scrubber

Est. Cost $6,000

Product# 9087163020

https://www.nasscoinc.com/janitorial/floorcleaningequipment/automaticfloorscrubbersandaccessories/advanceadfinitytractiondriveautoscrubbers/31484365/

Rubbermaid WaveBrake Mop Bucket, Mop Handle, and Mop Heads

Est. Cost: $150

http://www.webstaurantstore.com/rubbermaid-gray-1863899-35-qt-executive-series-wavebrake-down-press-mop-bucket/6901863899GY.html?utm_source=Google&utm_medium=cpc&utm_campaign=GoogleShopping&gclid=CP7ts__Fx9ICFRO1wAod0bkMyw

Rubbermaid Wall Mount Wet Floor Signs

A collapsible and automatically-deployed cone

http://www.airdelights.com/floor-safety-signs.html?gclid=CN6l5IKwx9ICFYi2wAoditoDaQ

Lightweight Hybrid 4-step Ladder W/ 2 Large Platform Steps

Est. Cost: $100

http://www.ebay.com/itm/like/172119295272?lpid=82&chn=ps&ul_noapp=true

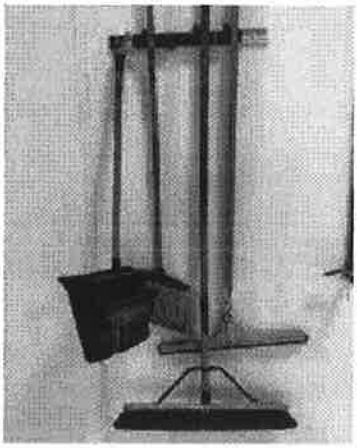
Cosco Two Step Folding Step Stool

Est. Cost: $35

http://www.globalindustrial.com/p/tools/ladders/step-ladder-steel/cosco-two-step-big-step-fold-step-ladhand-grip-200-gy-black-11308pbl1e?infoParam.campaignId=T9F&gclid=CI3kqamVytICFVW5wAodsp4HvQ

Wall Mounted Broomstick Holder, Brooms, Dustpans, Squeegees

https://www.build.com/hafele-888-00-015/s368680



Wen Utility Cart (for maintenance and miscellaneous uses)

Est. Cost: $80

http://www.homedepot.com/p/WEN-500-lbs-Capacity-Service-Cart-73002/204787186?cm_mmc=Shopping%7cG%7cBase%7cPLA%7cD25T%7cTools&gclid=COrf9tKDyNICFc61wAodmaMIAA&gclsrc=aw.ds

Chapin Poly Proseries 2 gallon XP sprayer (spraying bleach / Cleaning tables and walls)

Est. cost: $35

https://www.amazon.com/Chapin-26021XP-Fertilizer-Herbicides-Pesticides/dp/B00295N5VK/ref=sr_1_1?ie=UTF8&qid=1492469374&sr=8-1&keywords=chapin+pro+series+2+gallon+sprayer

DEK CH1M15 4 in. 420cc 15 HP Gas Commercial Duty Chipper Shredder (Also consider an electric chipper to eliminate the need to duct exhaust from the warehouse)

Est. Cost: $1,200.00

http://www.homedepot.com/p/DEK-4-in-420cc-15-HP-Gas-Commercial-Duty-Chipper-Shredder-CH1M17/206162361?cm_mmc=Shopping|THD|google|&mid=sh1TJ4vqW|dc_mtid_890338a25189_pcrid_139636283740_pkw_pmt_product_206162361_slid_&gclid=CPf5jrSnrtMCFQaTaQodaQwETg

123 Gallon Steel Stock Tank (washing pots and other grow equipment)

Est. Cost: $200 (Need 2 Tanks for rinsing bleach off equipment thoroughly)

https://www.ebay.com/p/Behlen-Country-Re226c-Galvanized-Steel-Round-End-Stock-Tank-Approximately-123-G/1507488814

Sanitizing Footbath Floor Mat (place at building entrances)

Est. Cost: $118

http://www.americanfloormats.com/sanitizing-footbath-floor-mat/?gclid=EAIaIQobChMIncbp5NbZ1gIVjVqGCh2XGgTuEAYYASABEgJxRfD_BwE

APPENDIX C

Water Use Plan

BASK Ventures, Inc.
413 Pipes Lane
Encinitas, CA 92024

November 19, 2018

TO: Green Team Holdings LLC / Sierra Business Park Owners' Association (SBPOA)

RE: Water Service / Wastewater Discharge

To whom it may concern:

BASK Ventures, Inc. is in process of applying for a small indoor recreational cannabis cultivation permit on Lot # 4 (474 Industrial Circle) owned by Green Team Holdings LLC. Upon receiving the proper county and state approvals/licenses, BASK intends to begin construction around May 2019. With the understanding that SBPOA is the retail water provider for the Sierra Business Park, BASK anticipates the following water demands:

- Year 1 (2019): 200-300 gallons/day
- Year 2 (2020): 500-600 gallons/day
- Year 3 (2021): 800-1000 gallons/day

Our operation plan entails a slow phase out of our licensed canopy space and the timeframe is dependent on product demand and the success of the business. BASK will install a water holding tank on the property so that we will be able to slow draw our daily allotment of water during periods of low demand such as overnight or during the weekend. BASK plans to build a reserve of water storage onsite to help mitigate any operational issues BASK could incur due to potential downtime of water service. Additionally, BASK will keep constant communication with SBPOA and the water manager to ensure our operation will put the least amount of stress possible on the water system. BASK understands that the water system will be metered and we have been given the rate structure to expect.

BASK understands that ongoing issues exist with the current water system, there may be expected and unexpected downtime in water service due to potential construction of a new system and/or maintenance of the current water system. For any scheduled downtime, BASK would ask for advanced notification so that the necessary steps can be taken to ensure operation.

BASK will not have any wastewater discharge. The operation will be built around a closed loop system where any wastewater generated will be stored in a holding tank. This holding tank is separate of our septic system. All operational grow areas will have floor drains installed which will flow directly to the holding tank. The sources of our wastewater will be excess irrigation (which we hope to limit to no more than 2-4% of water intake), cleaning and RO filtration reject stream. We plan to reclaim this wastewater by running it through our RO system and reusing the filtered water for operation. The reject stream from this wastewater filtration will be evaporated onsite using an industrial wastewater evaporator. Any solids leftover from evaporation will be disposed of with waste management.

Sincerely,
Brian Herman, CEO
BASK Ventures, Inc.

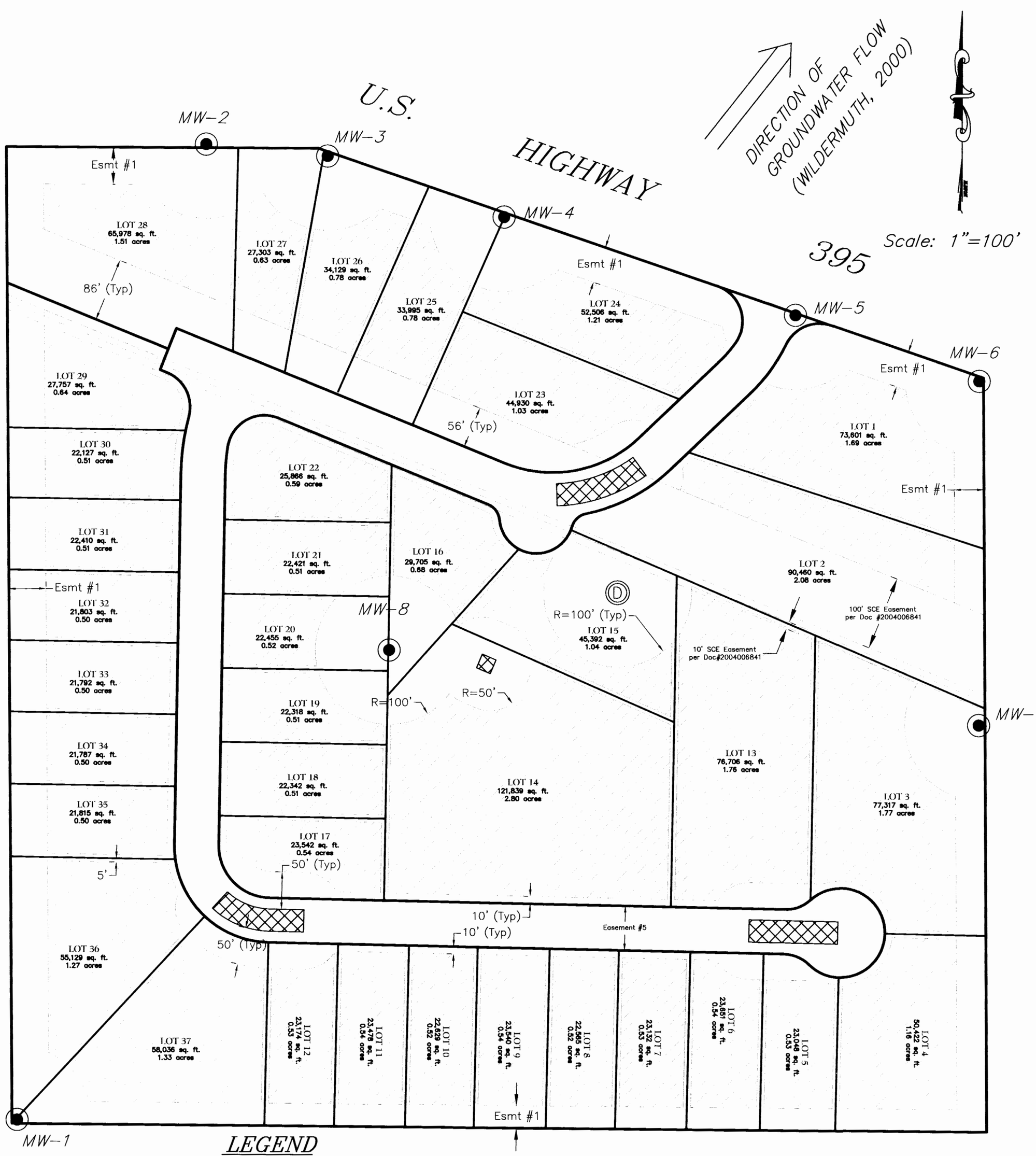
APPENDIX D

Tract Map No. 36-159 Sierra Business Park Supplemental Sheet No. 1 & 2

FINAL MAP
TRACT MAP NO. 36–159
SIERRA BUSINESS PARK
SUPPLEMENTAL SHEET NO. 1

BEING A SUBDIVISION OF THE PROPERTY DESCRIBED IN O.R. 700/226, A PORTION OF THE NE ¼ OF THE SE ¼ OF SEC 3, T 4 S, R 28 E, MDM, COUNTY OF MONO, STATE OF CALIFORNIA

SEE SHEET 10 OF 10 FOR SUPPLEMENTAL SHEET NOTES AND MAXIMUM ALLOWABLE WASTEWATER DAILY DISCHARGE TABLE.



LEGEND

MW–7 MONITORING WELL NUMBER

◉ SURVEYED MONITORING WELL LOCATION WITH 100–FT RADIUS SETBACK

Ⓓ SURVEYED PRODUCTION WELL LOCATION WITH 100–FT RADIUS SETBACK

RETENTION STRUCTURE

REQUIRED SETBACK LINE FOR SEWAGE DISPOSAL

SEWAGE DISPOSAL SETBACK PLAN

SIERRA BUSINESS PARK

TM Book 10 Page 75 H

FINAL MAP
TRACT MAP NO. 36–159
SIERRA BUSINESS PARK
SUPPLEMENTAL SHEET NO. 2

BEING A SUBDIVISION OF THE PROPERTY DESCRIBED IN O.R. 700/226, A PORTION OF THE NE ¼ OF THE SE ¼ OF SEC 3, T 4 S, R 28 E, MDM, COUNTY OF MONO, STATE OF CALIFORNIA

NOTES:

1. The information on Sheet 9 of 10 and Sheet 10 of 10 is for informational purposes, describing conditions as of the date of filing, and is not intended to affect record title interest. The information hereon is derived from public records or reports, and does not imply the correctness or sufficiency of those records or reports.

2. The maximum allowable daily sewage waste discharge on each parcel is limited to 250 gal/0.5 acre/day, as further defined and described in the declaration.

3. The Deed to each lot within the Sierra Business Park shall contain a prohibition against the dumping of any industrial or hazardous wastes into the onsite septic system and onsite drainage system, as further defined and described in the declaration.

4. The area within the 100' wide Southern California Edison Company Easement is encumbered by an Amendment of Grant of Easement Restrictions and Conditions as recorded in Doc#2004007751. Restrictions within the 100' wide Southern California Edison Easement include, but are not limited to, the following:

a. No structures or obstructions, including, but not limited to, fences or block walls or retainer walls.

b. No refueling, storing, or repair of any vehicles or equipment. Parking shall not be allowed within the 100' wide easement, except as provided for in #4.h. below.

c. No storage of any flammable materials.

d. No swimming pools, ponds, and appurtenances, playground facilities and appurtenances, corrals and/or pens.

e. No earth, rubbish, debris or any other substances or materials may be deposited within the 100' wide easement.

f. Trees and plants shall not exceed 15' in height.

g. Snow storage shall not be allowed within the 100' wide easement.

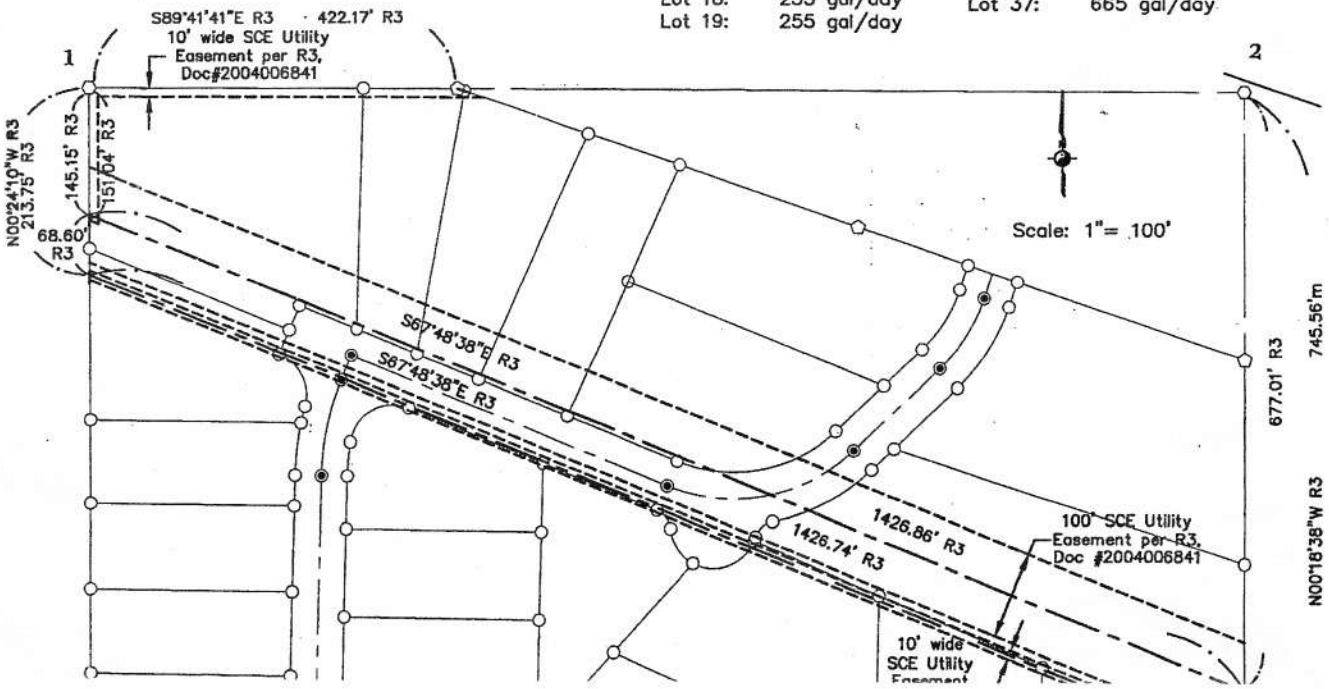
h. No parking is allowed except for the northerly 25' of the 100' wide easement. In case of emergency, vehicles parked in the northerly 25' of the easement shall be immediately removed.

i. Property Owners must obtain permission from SCE for any development within the SCE Easement and submit grading and site development plans to SCE 60 days prior to commencement of any construction.

5. The Perimeter Maintenance Zone (PMZ) Easement shall have no allowed uses by any Owner, as further defined and described in the Declaration.

MAXIMUM ALLOWABLE WASTEWATER DAILY DISCHARGE TABLE:

Lot 1:	845 gal/day	Lot 20:	260 gal/day
Lot 2:	1,040 gal/day	Lot 21:	255 gal/day
Lot 3:	885 gal/day	Lot 22:	295 gal/day
Lot 4:	580 gal/day	Lot 23	515 gal/day
Lot 5:	265 gal/day	Lot 24:	605 gal/day
Lot 6:	270 gal/day	Lot 25:	390 gal/day
Lot 7:	265 gal/day	Lot 26:	390 gal/day
Lot 8:	260 gal/day	Lot 27:	315 gal/day
Lot 9:	270 gal/day	Lot 28:	845 gal/day
Lot 10:	260 gal/day	Lot 29:	400 gal/day
Lot 11:	270 gal/day	Lot 30:	255 gal/day
Lot 12:	265 gal/day	Lot 31:	255 gal/day
Lot 13:	880 gal/day	Lot 32:	250 gal/day
Lot 14:	1,400 gal/day	Lot 33:	250 gal/day
Lot 15:	520 gal/day	Lot 34:	250 gal/day
Lot 16:	340 gal/day	Lot 35:	250 gal/day
Lot 17:	270 gal/day	Lot 36	635 gal/day
Lot 18:	255 gal/day	Lot 37:	665 gal/day
Lot 19:	255 gal/day		



APPENDIX E

Will Serve Letters

SIERRA BUSINESS PARK OWNERS' ASSOCIATION (SBPOA)
a nonprofit mutual benefit corporation

November 18, 2018

TO: Mono County Planning Department
ATTN: Michael Draper

RE: Will Serve Letter /Approval
BASK Ventures, Inc., Green Team Holdings, Inc.
Property location: Lot #4, Sierra Business Park (474 Industrial Circle)

Mr. Draper:

In accordance with the Sierra Business Park (SBP) Declaration of Covenants, Conditions and Restrictions, section O.3 Operation of Water System – Exclusive service, SBP will be the exclusive retail water provider for Lot #4 owned by Green Team Holdings LLC.

Please accept this letter as the required Will Serve Letter from the SBPOA.

Sincerely

Greg Cook, President
SBPOA

DocuSigned by:
Greg Cook
240A491653064D8...
11/30/2018 12:12:32 PM PST

TO: Mono County Planning Department
ATTN: Michael Draper & Kelly Karl

RE: Will Serve Letter /Approval
BASK Ventures, Inc., Green Team Holdings, Inc.
Property location: Lot #4, Sierra Business Park (474 Industrial Circle)

Mr. Draper & Ms. Karl,

This letter will serve as confirmation that the Mountain Meadows Mutual Water Company has sufficient water supply to serve the proposed project by BASK Ventures, Inc. located in the Sierra Business Park. The water will be F.O.B. at our well site in Crowley Lake.

Please accept this letter as the required Will Serve Letter from the Mountain Meadows Mutual Water Company.

Sincerely,

David Richman
Vice-President Operations
Mountain Meadows Mutual Water Company

1/30/19

Long Valley Fire Protection District

3605 Crowley Lake Drive •
Crowley Lake • California 93546-1145
Ph. 760.935.4545
longvalleyfd@gmail.com

Provisional Will Serve Letter

May 10, 2019

Green Team LLC.

C/o: Brian Herman

474 Industrial Circle

Crowley Lake, Ca. 93546

APN# 037-260-004-000

The above project is within the boundaries of the Long Valley Fire Protection District service area. The above stated project will have no adverse effect on the fire department if the project has been built and maintained to the provisions of the International Fire Code and all local codes and ordinances. A provisional design submittal has been provided to the Fire Dept. and is in accordance with this Will Serve Letter. A final will serve letter will be provided to the client upon completion of the project. If all construction components have been address and FINALED by local county building authority, then the letter will serve as final acceptance letter for the above owner.

If you have any further question please let me know.

Sincerely,

Vince Maniaci

Long Valley Fire Department-Chief

APPENDIX F

Conditional Waiver of Waste Discharge Requirements Notice of Applicability

March 26, 2019 WDID No. 6V26CC409918

Steve Kent
BASK Ventures, Inc.
474 Industrial Circle
Mammoth Lakes, CA 93546

NOTICE OF APPLICABILITY – CONDITIONAL WAIVER OF WASTE DISCHARGE REQUIREMENTS, WATER QUALITY ORDER NO. WQ-2017-0023-DWQ, BASK VENTURES, INC., MONO COUNTY — APN 037260004000, WDID NO. 6V26CC409918

EXPIRATION DATE: DECEMBER 17, 2022

Dear Steve Kent,

BASK Ventures, Inc. (hereafter Discharger) submitted information via the State Water Resources Control Board's (State Water Board's) online portal on February 20, 2019, for discharges of waste associated with indoor cannabis cultivation related activities at 474 Industrial Circle, Mammoth Lakes (37.62638°N, 118.863787°W). The property is owned by Green Team Holdings, LLC. Kyle Paben, the landowner contact, is receiving separate notification of this application. After processing the March 6, 2019 application fee payment, the State Water Board transferred site information to us for processing.

The landowner is ultimately responsible for any water quality degradation that occurs on or originates from their property and for water diversions that are not in compliance with the State Water Board's *Cannabis Cultivation Policy- Principles and Guidelines for Cannabis Cultivation* (Policy) and the *General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities*, Order No. WQ-2017-0023-DWQ (General Order). The cannabis cultivator and the landowner will be held responsible for correcting non-compliance.

Based on the information provided, the Discharger self-certifies the cannabis cultivation activities are consistent with the requirements of the Policy and General Order. This letter provides notice that the Policy and General Order are applicable to the site as described below. You are hereby assigned waste discharge identification (WDID) No.

6V26CC409918. The Discharger is responsible for all the applicable requirements in the Policy, General Order, and this Notice of Applicability (NOA).

FACILITY AND DISCHARGE DESCRIPTION

The information submitted by the Discharger states that the cannabis cultivation activities occur within a structure with a permanent roof, a permanent relatively impermeable floor (e.g., concrete or asphalt paved), and all hydroponic/industrial wastewaters generated are contained within a sealed tank or recirculated system with final waste products hauled off site. Based on the information submitted, the cultivation activity is consistent with the Waiver of Waste Discharge Requirements (Conditional Waiver). Cannabis cultivation activities at BASK Ventures, Inc. are therefore conditionally exempt and covered under the Conditional Waiver as indoor cultivation.

Coverage under this Conditional Waiver expires on December 17, 2022, and the Discharger will be required to re-apply for coverage at that time to continue any cannabis cultivation activities.

SITE-SPECIFIC REQUIREMENTS

1. The Policy and General Order are available on the Internet at: https://www.waterboards.ca.gov/water_issues/programs/cannabis. The Discharger shall ensure that all site operating personnel know, understand, and comply with the requirements contained in the Policy, General Order, and this NOA. Note that the General Order contains standard provisions, general requirements, and prohibitions that apply to all cannabis cultivation activities.

2. In accordance with the Policy and General Order requirements, the Discharger must retain manifest records provided by the authorized waste hauler and provide copies of manifest records to Water Boards staff upon request.

3. The Discharger shall notify Water Boards staff in writing of any proposed change in the method of wastewater disposal.

4. The Discharger shall permit representatives of the Regional Water Board and/or the State Water Board, upon presentation of credentials, to:

    i. Enter premises where cannabis is cultivated or processed, wastes are treated, stored, or disposed of, and facilities in which any records are kept.

    ii. Copy any records required under terms and conditions of the General Order.

    iii. Inspect at reasonable hours, monitoring equipment required by this General Order (as applicable).

    iv. Sample, photograph, and/or video record any cultivation activity, discharge, waste material, waste treatment system, or monitoring device.

5. Your facility is located in the Long Hydroloic Area (HU No. 603.10). Land disturbance equal to or greater than 10,000 square feet and less than or equal to one acre not directly related to cultivation (i.e., infrastructure-related) may require coverage under the General Board Order No. R6T-2003-0004 (attached). See: https://www.waterboards.ca.gov/lahontan/water_issues/available_documents/#permits for additional details.

TECHNICAL REPORT REQUIREMENTS

A *Site Closure Report* must be submitted 90 days prior to permanently ending cannabis cultivation activities and seeking to rescind coverage under the Conditional Waiver. The *Site Closure Report* must be consistent with the requirements of General Order Provision C.1.e., and Attachment A, Section 5. Attachment D of the General Order provides guidance on the contents of the *Site Closure Report.*

TERMINATION OF COVERAGE UNDER THE GENERAL ORDER AND REGIONAL WATER BOARD CONTACT INFORMATION

Cannabis Dischargers that propose to terminate coverage under the Conditional Waiver or General Order must submit a Notice of Termination (NOT). The NOT must include a *Site Closure Report* (see Technical Report Requirements above), and Dischargers enrolled under the General Order must also submit a final monitoring report. The Regional Water Board reserves the right to inspect the site before approving an NOT. Attachment C of the General Order includes the NOT form, and Attachment D of the General Order provides guidance on the contents of the *Site Closure Report.*

Please notify us 30 days prior to commencing cultivation. Please direct all submittals, discharge notifications, and questions regarding compliance and enforcement to our office. We can be emailed at lahontan.cannabis@waterboards.ca.gov. Phone calls may be directed to me at (530) 542-5414 (patty.kouyoumdjian@waterboards.ca.gov), or Emily Cushman, Engineering Geologist at (530) 542-5598 (emily.cushman@waterboards.ca.gov).

Patty Z Kouyoumdjian

PATTY Z. KOUYOUMDJIAN
EXECUTIVE OFFICER

Enclosure: General Board Order No. R6T-2003-0004

cc: Louis Molina, Director, Department of Environmental Health, Mono County
Edith Martinez, Senior Environmental Scientist Specialist, CA Department of Fish and Wildlife
Kevin Porzio, SWRCE, Department of Water Quality, State Water Board
Emily Cushman, Lahontan Water Board

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LAHONTAN REGION

BOARD ORDER NO. R6T-2003-0004

GENERAL WASTE DISCHARGE REQUIREMENTS
FOR

SMALL CONSTRUCTION PROJECTS, INCLUDING UTILITY, PUBLIC WORKS, AND MINOR STREAMBED/LAKEBED ALTERATION PROJECTS IN THE LAHONTAN REGION EXCLUDING THE LAKE TAHOE HYDROLOGIC UNIT

The California Regional Water Quality Control Board, Lahontan Region (Regional Board) finds:

1. In accordance with Section 13260 of the California Water Code, the discharge of storm water runoff and products of erosion from small construction projects, including utility, public works, within certain sensitive watersheds in the Lahontan Region, and discharges associated with minor streambed/lakebed alteration projects in the Lahontan Region is considered to be a discharge of waste that could affect the quality of waters of the State.

2. The Regional Board may prescribe requirements for any proposed discharge, in accordance with Section 13263 of the California Water Code.

3. Implementation of temporary best management practices (BMPs) is an effective and economical means of preventing or minimizing the discharge of the products of erosion, sediment-laden storm water, and minor waste material spills from small construction projects.

4. Implementation of permanent best management practices (BMPs) after construction is an effective means of treating storm water runoff from impervious surfaces and of preventing erosion following construction of small sites.

5. This General Permit regulates: 1) discharges associated with minor streambed/lakebed alteration projects in the Lahontan Region; and 2) storm water discharges from small construction activity that enter surface waters either directly or indirectly through drainage conveyances or municipal separate storm sewer facilities within the following Hydrologic Units/Areas in the Lahontan Region (see Attachments "A", "B", and "C"):

    a. Little Truckee River Hydrologic Unit (HU No. 636.00)
    b. Truckee River Hydrologic Area (HU No. 635.20)
    c. West Fork Carson River Hydrologic Unit (HU No. 633.00)
    d. East Fork Carson River Hydrologic Unit (HU No. 632.00)
    e. Mono Hydrologic Unit (HU No. 601.00)
    f. Long Hydrologic Area (HU No. 603.10)

6. Small construction projects located within the jurisdiction of local agencies that have entered into a Memorandum of Understanding (MOU) with the Regional Board to implement a storm water construction pollution control program in accordance with the *Water Quality Control Plan for the Lahontan Region* (Basin Plan) are not subject to this General Permit. The Town of Mammoth Lakes has entered into such an MOU with the Regional Board and upon adoption of this Permit the Regional Board waives requirements for submitting Reports of Waste Discharge for small construction activity, as defined in Finding 9, within the Mammoth Lakes jurisdiction. Subsequent to the adoption of this Order, other jurisdictions may enter into MOUs with the Regional Board and qualify for a similar waiver.

7. Discharges of storm water runoff and products of erosion from certain construction projects in the Lake Tahoe Hydrologic Unit are regulated under separate General Waste Discharge Requirements and are not covered under this permit.

8. This General Permit does not preempt or supersede the authority of local storm water management agencies to prohibit, restrict, or control storm water discharges to separate storm sewer systems or other watercourses within their jurisdiction, as allowed by State and Federal law.

9. For purposes of this Order, a "small construction project" includes construction activity that results in land disturbance of 10,000 square feet or more and is not covered under the State Water Resources Control Board (SWRCB) Water Quality Order 99-08-DWQ (Statewide Construction General Permit). Land disturbance is clearing, grading, or disturbances to the ground, including excavation and stockpiling, within the footprint of the structure to be constructed, and any staging and access areas that disturb native soil conditions. Only the actual area of land disturbance is considered when determining whether a project must be covered under this Permit. For example, if a 1-acre parcel (43,560 square feet) is to be developed, but only 9,000 square feet of soil will be disturbed within the project site, coverage under this Permit is not required. Small construction projects also include utility projects proposed by a public or private utility and public works projects proposed by a public entity that involve 10,000 square feet or more of land disturbance.

   The Statewide Construction General Permit currently covers projects involving one acre or more of land disturbance. Small construction activity that results in land disturbances of less than 10,000 square feet is subject to this General Permit if the construction activity is part of a larger common plan of development that, as a whole, encompasses 10,000 square feet, but less than 1 acre of soil disturbance. For example, a single development that is completed in two separate phases, with each phase disturbing 8,000 square feet, would require coverage under this Permit because the total land disturbance associated with the project as a whole is 16,000 square feet. For purposes of this Order, Construction activity does not include routine maintenance to maintain original line and grade, hydraulic capacity, or original purpose of the facility, nor does it include emergency construction activities required to protect public health and safety.

10. For purposes of this order, a "minor streambed/lakebed alteration project" is one that includes soil disturbing work, including maintenance dredging, within the high water mark of any water body in the Lahontan Region or the 100-year floodplain in the Truckee and Little Truckee River Hydrologic Units, and is not regulated by the Army Corps of Engineers under Clean Water Act (CWA) Section 404.

11. This General Permit does not authorize discharges of fill or dredged material regulated by the U.S. Army Corps of Engineers under CWA Section 404 and does not constitute a state water quality certification under CWA Section 401.

12. To obtain authorization for proposed storm water discharges associated with land disturbing activities to ground and/or surface waters pursuant to this General Permit, the Discharger must submit a Notice of Intent (NOI – Attachment "D") to comply with the General Permit and a filing fee to the Regional Board prior to commencement of construction activities. The NOI must include a description of specific temporary and permanent Best Management Practices (BMPs) to be implemented to prevent or minimize the discharge of waste from the project site during and after construction (see Attachment "E"). For proposed construction activity on easements or on nearby property by agreement or permission, the entity responsible for the construction activity must submit the NOI and filing fee and shall be responsible for development and implementation of the BMPs. Coverage under the General Permit shall begin upon written notification from the Regional Board or 30 days following Regional Board receipt of an NOI if the applicant receives no response from the Regional Board.

13. If an individual National Pollutant Discharge Elimination System (NPDES) Permit is issued to a discharger for activities otherwise subject to this General Permit, or if an alternative general or individual permit is subsequently adopted which covers storm water discharges regulated by this General Permit, the applicability of this General Permit to such discharges is automatically terminated on the effective date of the individual permit or the date of approval for coverage under the subsequent General Permit.

14. Potential pollutant discharges from projects covered under this General Permit consist of products of erosion, construction waste materials, dewatering waste, turbid water and waste earthen materials from work within surface waters, and small amounts of petroleum products from construction equipment.

15. The Regional Board adopted and the State Water Resources Control Board (SWRCB) approved the *Water Quality Control Plan for the Lahontan Region* (Basin Plan). This General Permit implements the Basin Plan. Dischargers regulated by this General Permit must comply with the water quality standards, guidelines, and prohibitions in the Basin Plan, and subsequent amendments thereto.

16. Runoff from the project sites will potentially enter either ground or surface waters of the Hydrologic Units/Areas listed in Finding 5.

17. The beneficial uses of ground and surface waters within the Hydrologic Units/Areas listed in Finding 5 are provided in Chapter 2 of the Basin Plan. There are a variety of designated beneficial uses for individual water bodies that are too numerous to list in this General Permit. The pertinent information is available from the Basin Plan at the Regional Board offices and may be found at the following website - http://www.swrcb.ca.gov/rwqcb6/files.htm

18. A Negative Declaration for the adoption of this General Permit was certified by the Regional Board on January 8, 2003 (Resolution No. R6T-2003-0004) in accordance with the California Environmental Quality Act (Public Resources Code Section 21000 et seq.).

19. The projects regulated by this General Permit are typically nonrecurring and short-term construction projects that will normally be completed within two construction seasons. The applicability of these requirements to the specific project may be revoked pursuant to Administrative Provisions – Section IV.D.

20. The Regional Board has notified the interested agencies and persons of its intent to adopt general waste discharge requirements for small construction projects and has provided them with an opportunity to submit their written views and recommendations.

21. The Regional Board in a public meeting heard and considered all comments pertaining to the requirements.

IT IS HEREBY ORDERED that all dischargers submitting an NOI, applicable fee, and BMP plan in accordance with this permit shall comply with the following:

I. DISCHARGE PROHIBITIONS

A. The discharge of waste[1], including but not limited to, waste earthen materials (such as soil, silt, sand, clay, rock, or other organic or mineral material) that causes violation of any narrative water quality objective contained in the Basin Plan, including the Nondegradation Objective, is prohibited.

B. The discharge of waste that causes violation of any numeric water quality objective contained in the Basin Plan is prohibited.

C. Where any numeric or narrative water quality objective contained in the Basin Plan is already being violated, the discharge of waste that causes further degradation or pollution is prohibited.

D. The discharge, attributable to human activities, of solid or liquid waste materials, including but not limited to soil, silt, clay, sand, or other organic or earthen material, to surface waters of the Truckee River and Little Truckee River Hydrologic Units, is prohibited.

E. The discharge or threatened discharge, attributable to human activities, of solid or liquid waste materials, including but not limited to soil, silt, clay, sand, or other organic or earthen material, to lands within the 100-year floodplain of the Little Truckee River and Truckee River, or any tributary to the Little Truckee and Truckee Rivers, is prohibited. A summary of the waste discharge prohibitions and exception criteria is presented in Attachment "F."

F. Unless specifically granted, authorization pursuant to this General Permit does not constitute an exemption to applicable discharge prohibitions prescribed in the Basin Plan.

G. Unless otherwise authorized by a separate waste discharge permit, discharges of material other than storm water, including dewatering waste, to a separate storm sewer system or waters of the state are prohibited. Discharge of dewatering waste to land is covered under this General Permit providing that there are no pollutants present that could degrade groundwater quality. If no land disposal alternatives exist for dewatering waste, the Discharger may seek coverage to discharge dewatering waste to surface waters under a separate NPDES permit by submitting a separate Report of Waste Discharge.

H. Discharges of non-storm water are allowed only when necessary for performance and completion of construction projects and where they do not cause or contribute to a violation of any water quality standard. Such discharges must be described in the BMP plan (see Provision III – Best Management Practices). Wherever feasible, alternatives that do not result in the discharge of non-storm water, or that discharge any non-storm water to land, shall be implemented.

[1] CWC Section 13050(d): "Waste" includes sewage and any and all other waste substances, liquid, solid, gaseous, or radioactive, associated with human habitation, or of human or animal origin, or from any producing, manufacturing, or processing operation, including waste placed within containers of whatever nature prior to, and for purposes of, disposal.

I. Storm water discharges regulated by this General Permit shall not contain a hazardous substance equal to or in excess of a reportable quantity listed in 40 CFR Part 117 and/or 40 CFR Part 302.

J. Except under emergency conditions, land disturbance between October 15 of any year and May 1 of the following year is prohibited in the Little Truckee River and Truckee River Hydrologic Units. Where it can be shown that granting a variance would not cause or contribute to the degradation of water quality, an exception to the dates stated above may be granted in writing by the Executive Officer.

K. The discharge of fresh concrete or grout to surface waters is prohibited, unless the discharge is confined to the work area and isolated from flowing streams or water bodies.

L. The discharge of oil, gasoline, diesel fuel, any petroleum derivative, any toxic chemical, or hazardous waste is prohibited.

M. The discharge of waste, including wastes contained in storm water, shall not cause a pollution, threatened pollution, or nuisance as defined in Section 13050 of the California Water Code.

II. RECEIVING WATER LIMITATIONS

A. Storm water discharges and authorized nonstorm water discharges to any ground water or surface water shall not adversely impact human health or the environment.

B. The discharge of storm water from the project area to surface waters shall not cause or contribute to a violation of any narrative or numeric water quality objective contained in the Basin Plan. Where any numeric or narrative water quality objective contained in the Basin Plan is already being violated, the discharge of waste that causes further degradation or pollution is prohibited. A complete listing of water quality objectives is presented in the Basin Plan, Chapter 3 and can be found at the following website - http://www.swrcb.ca.gov/rwqcb6/files.htm

Water quality objectives that apply to all surface waters within the Lahontan Region include, but are not limited to, the following construction-related pollutants.

Oil and Grease
Waters shall not contain oils, greases, waxes or other materials in concentrations that result in a visible film or coating on the surface of the water or on objects in the water, that cause nuisance, or that otherwise adversely affect the water for beneficial uses.

For natural high quality waters, the concentration of oils, greases, or other film or coat generating substances shall not be altered.

pH
In fresh waters with designated beneficial uses of COLD or WARM, changes in normal ambient pH levels shall not exceed 0.5 pH units. For all other waters of the Region, the pH shall not be depressed below 6.5 nor raised above 8.5.

The Regional Board recognizes that some waters of the Region may have natural pH levels outside of the 6.5 to 8.5 range. Compliance with the pH objective for these waters will be determined on a case-by-case basis.

Sediment
The suspended sediment load and suspended sediment discharge rate of surface waters shall not be altered in such a manner as to cause nuisance or adversely affect the water for beneficial uses.

Settleable Materials
Waters shall not contain substances in concentrations that result in deposition of material that causes nuisance or that adversely affects the water for beneficial uses. For natural high quality waters, the concentration of settleable materials shall not be raised by more that 0.1 milliliter per liter.

Turbidity
Waters shall be free of changes in turbidity that cause nuisance or adversely affect the water for beneficial uses. For all waters, increases in turbidity shall not exceed natural levels by more than 10 percent. Additionally for the Little Truckee Hydrologic Unit and Truckee River Hydrologic Area, turbidity shall not be raised above 3 Nephelometric Turbidity Units (NTU) mean of monthly means. Additionally for the West Fork Carson River Hydrologic Unit, the turbidity shall not be raised above a mean of monthly means value of 2 NTU.

Toxicity
All waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in human, plant, animal, or aquatic life.

C. Should it be determined by the Discharger or Regional Board staff that storm water discharges and/or authorized nonstorm water discharges are causing or contributing to a violation of an applicable water quality standard, the Discharger shall:

1. Implement corrective measures immediately following discovery that water quality standards were violated, followed by notification to the Regional Board by telephone as soon as possible but no later than 48 hours after the discharge has been discovered. This notification shall be followed by a report within 14 calendar days to the Regional Board, unless otherwise directed by the Regional Board, describing (1) the nature and cause of the water quality standard violation; (2) the BMPs currently being implemented; (3) any additional BMPs which will be implemented to prevent or reduce pollutants that are causing or contributing to the violation of water quality standards; and (4) any maintenance or repair of BMPs. This report shall include an implementation schedule for corrective actions and shall describe the actions taken to reduce the pollutants causing or contributing to the violation.

2. The Discharger shall revise storm water pollution control measures and monitoring procedures to incorporate: 1) the additional BMPs that have been, and will be implemented; 2) the implementation schedule; and 3) any additional monitoring needed.

3. Nothing in this section shall prevent the Regional Board from enforcing any provisions of this General Permit while the Discharger prepares and implements the above report.

III. BEST MANAGEMENT PRACTICES (BMPs)

A. Prior to the initiation of any construction related activities, the Discharger shall develop a BMP implementation plan and install temporary erosion control facilities to prevent transport of earthen materials and other wastes off the property. Guidance for developing the BMP plan is provided in Attachment "E."

B. All land disturbing activities shall be conducted in accordance with the Lahontan Region Project Guidelines for Erosion Control (Attachment "G").

C. If the Regional Board determines that the proposed BMPs will not achieve the applicable standards and receiving water objectives, the Discharger may be required to implement additional or alternative BMPs.

IV. ADMINISTRATIVE PROVISIONS

A. Applicability and Timing

1. Upon receipt of the applicable filing fee, an NOI to comply with the provisions of this General Permit, and an adequate BMP plan, the Discharger will be issued a written Notice of Applicability (NOA). The Regional Board reserves the right to request additional information if the NOI and/or BMP plan is deemed inadequate.

2. The Discharger shall submit a NOI, a BMP plan, and the appropriate fee at least 30 days prior to the proposed date of construction. Additional time (up to 120 days) will be required for projects that propose disturbance to flood plains or waters of the state. Construction may not begin until a written NOA is received from the Regional Board or 30 days have elapsed from the date the NOI was received by the Regional Board. If the Discharger is notified in writing that the NOI and/or BMP plan is incomplete, the Discharger must provide the additional information requested in the notice and the Regional Board may take up to 30 days to respond with an NOA or request for additional information.

3. All Dischargers must implement the BMP plan and the Monitoring and Reporting Program upon commencement of construction.

4. Projects may be brought to the Regional Board for consideration of adoption of an individual WDR when the Executive Officer deems it necessary to achieve water quality protection.

5. The conditions of this General Permit do not exempt the Discharger from compliance with any other laws, regulations, or ordinances which may be applicable, do not legalize land treatment and disposal facilities, and leave unaffected any further restraints on those facilities which may be contained in other statutes or required by other regulatory agencies.

B. Provisions

1. All Dischargers must comply with the lawful requirements of municipalities, counties, drainage districts, and other local agencies regarding discharges of storm water to drainage systems or other water courses under their jurisdiction.

2. The Discharger shall at all times fully comply with the engineering plans, specifications, and technical reports developed for the project and/or submitted with the NOI. The Discharger shall at all times fully comply with the BMP Plan.

3. The Discharger must comply with the Standard Provisions for Waste Discharge Requirements contained in Attachment "H", which is made part of this General Permit.

4. Pursuant to California Water Code Section 13267, the Discharger shall comply with Monitoring and Reporting Program No. **R6T-2003-0004** hereby made a part of this General Permit.

5. The owners of property subject to this General Permit shall have a continuing responsibility for ensuring compliance with the General Permit. The Discharger identified in the NOA shall remain liable for General Permit violations until an NOI is received from the new owner/operator. Notification of applicable General Permit requirements shall be furnished to the new owners and/or operators and a copy of such notification shall be sent to the Regional Board. This General Permit is transferable to the new owner. Any change in the ownership and/or operation of property subject to this General Permit shall be reported to the Regional Board. The new owner must comply with the General Permit, including the Monitoring and Reporting Program.

C. Revocation Procedures

Coverage under the General Permit shall continue until revoked in writing by the Regional Board staff. The Discharger is responsible for notifying the Regional Board in writing that the project is complete, certifying that the required conditions are met, and requesting revocation of coverage under the General Permit. The General Permit for the specific project will be revoked provided the following conditions are met: 1) the construction project is complete and soil stabilization measures are in place and functioning; 2) permanent BMPs have been installed and are functional; 3) information required by the attached Monitoring and Reporting Program has been submitted; and 4) Regional Board staff have inspected the site, if deemed necessary.

I, Harold J. Singer, Executive Officer, do hereby certify that the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, Lahontan Region, on January 8, 2003.

Harold J. Singer

HAROLD J. SINGER
EXECUTIVE OFFICER

Attachment A: Map of Little Truckee River Hydrologic Unit and Truckee River Hydrologic Area

Attachment B: Map of West and East Forks Carson River Hydrologic Units

Attachment C: Map of Mono Hydrologic Unit and Long Hydrologic Area

Attachment D: Notice of Intent Form

Attachment E: Best Management Practices Plan

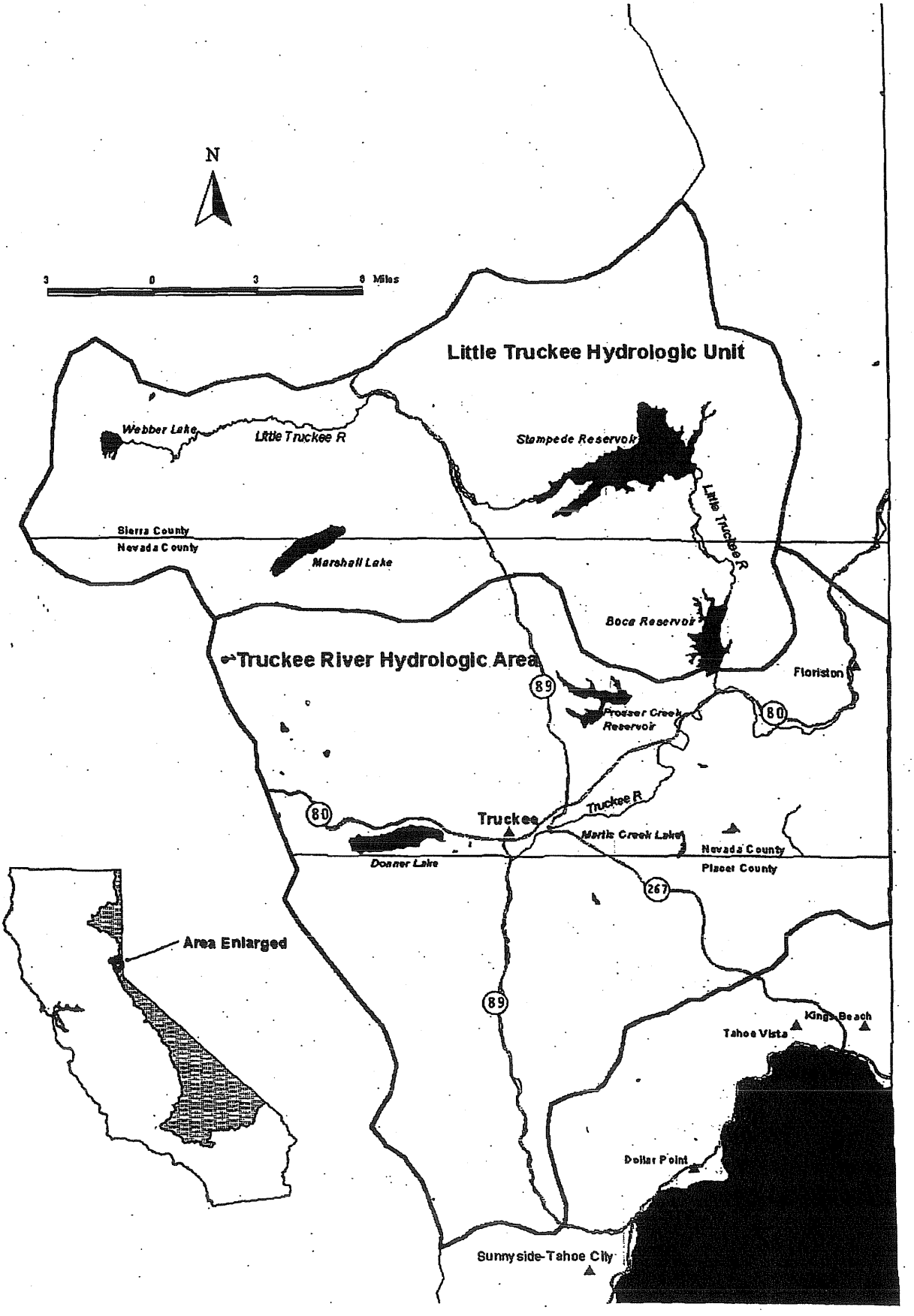
Attachment F: Waste Discharge Prohibitions and Exception Criteria for Projects within the Truckee River Hydrologic Unit

Attachment G: Lahontan Region Project Guidelines for Erosion Control

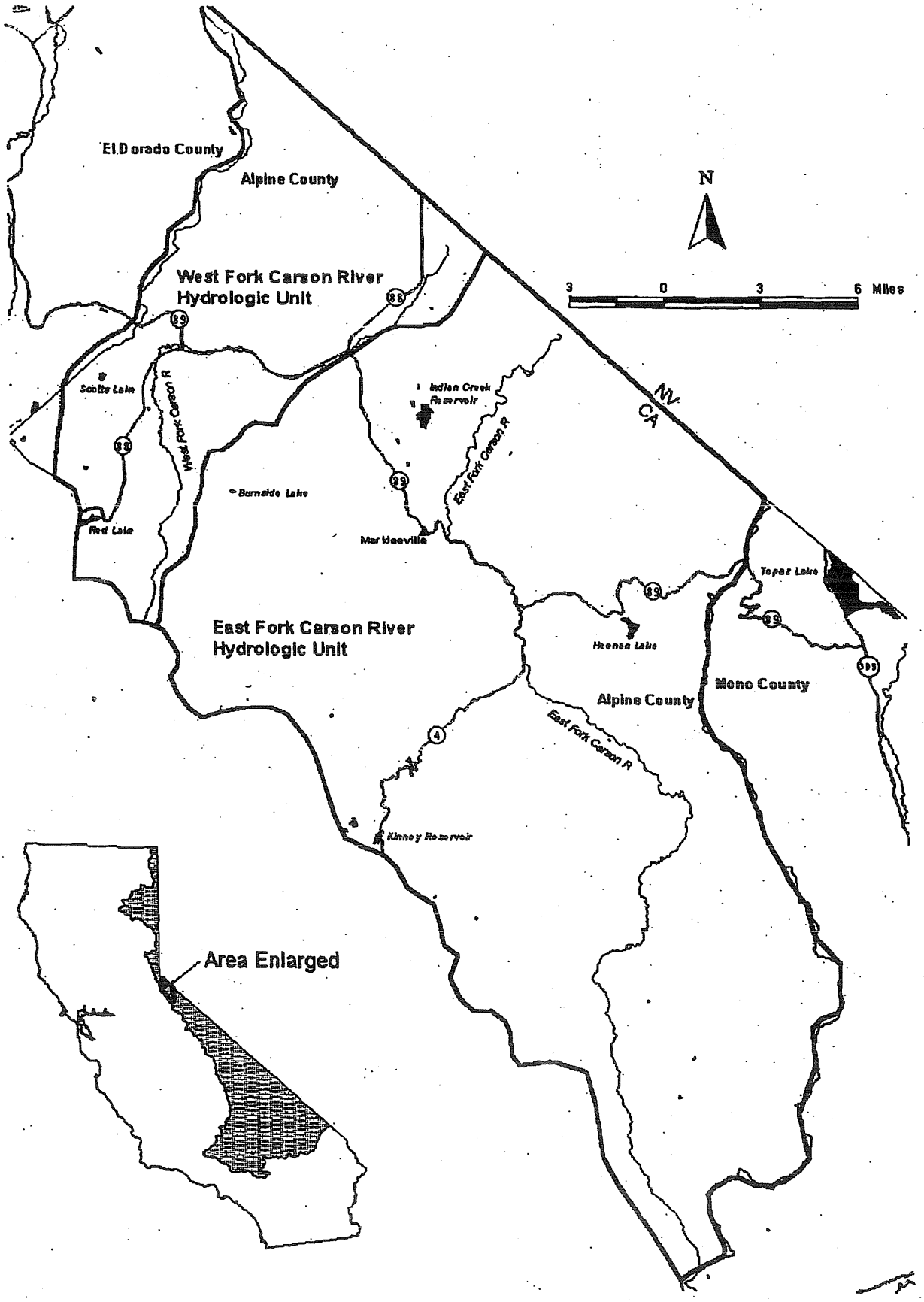
Attachment H: Standard Provision for Waste Discharge Requirements

BA/cgT: Small Construction General Permit WDR

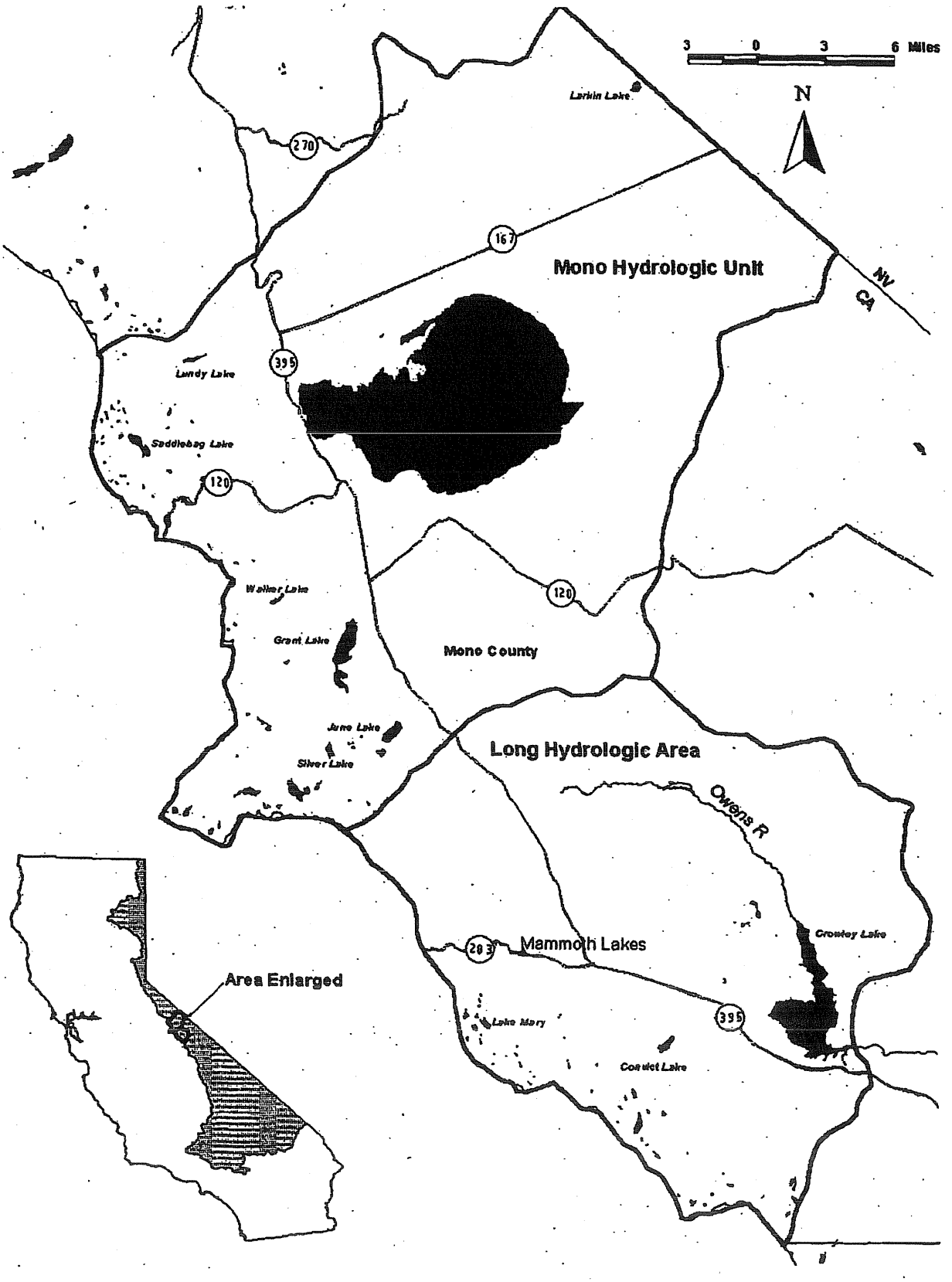
Attachment "A"
Little Truckee River Hydrologic Unit
And
Truckee River Hydrologic Area



Attachment "B"
West and East Fork Carson River
Hydrologic Units



Attachment "C"
Mono Hydrologic Unit
And
Long Hydrologic Area



ATTACHMENT "D"
California Regional Water Quality Control Board – Lahontan Region
NOTICE OF INTENT
TO COMPLY WITH THE TERMS OF THE GENERAL WASTE DISCHARGE REQUIREMENTS FOR SMALL CONSTRUCTION PROJECTS, INCLUDING UTILITY, PUBLIC WORKS, AND MINOR STREAMBED/LAKEBED ALTERATION PROJECTS IN THE LAHONTAN REGION EXCLUDING THE LAKE TAHOE HYDROLOGIC UNIT

(WQ ORDER No. R6T-2003-0004)

I. NOI STATUS (SEE INSTRUCTIONS)

MARK ONLY ONE ITEM 1. ☐ New Construction 2. ☐ Change of Information for WDID#

II. PROPERTY OWNER

Name	Contact Person		
Mailing Address	Title		
City	State	Zip	Phone ( ) –

III. DEVELOPER/CONTRACTOR INFORMATION

Developer/Contractor	Contact Person		
Mailing Address	Title		
City	State	Zip	Phone ( ) –

IV. CONSTRUCTION PROJECT INFORMATION

Site/Project Name	Site Contact Person		
Physical Address/Location	Latitude °	Longitude °	County
City (or nearest City)	Zip	Site Phone Number ( ) –	Emergency Phone Number ( ) –

A. Total size of construction site area: _____ Acres

B. Total area to be disturbed: _____ Acres (% of total _____)

C. Percent of site imperviousness (including rooftops):

Before Construction: _____%

After Construction: _____%

D. Tract Number(s): _____, _____

E. Mile Post Marker: _____

F. Is the construction site part of a larger common plan of development or sale?

☐ YES ☐ NO

G. Name of plan or development:

H. Construction commencement date: ____/____/____

I. % of site to be mass graded: _____

J. Projected construction dates:

Complete grading: ____/____/____ Complete project: ____/____/____

K. Type of Construction (Check all that apply):

1. ☐ Residential 2. ☐ Commercial 3. ☐ Industrial 4. ☐ Reconstruction 5. ☐ Transportation

6. ☐ Utility Description: _____ 7. ☐ Other (Please List): _____

ATTACHMENT "E"

BEST MANAGEMENT PRACTICES PLAN

The purpose of the Best Management Practices (BMP) plan is to evaluate potential sources of sediment and other pollutants at the construction site and put controls in place that will effectively prevent pollutant discharges to surface and ground waters. The following general pollution control elements should be addressed in the BMP Plan:

1. retain soil and sediment on the construction site;
2. prevent non-storm water discharges that would discharge pollutants off site;
3. prevent the discharge of other pollutants associated with construction activities to land or surface waters;
4. permanently stabilize disturbed soils; and
5. minimize the effects of increased storm water runoff from impervious surfaces.

For detailed information on construction related BMPs, the EPA document Storm Water Management for Construction Activities: Developing Pollution Prevention Plans and Best Management Practices may be found at the following website:
http://cfpub.epa.gov/npdes/pkeyword.cfm?keywords=BMPs&program_id=0

Additional information may be also be obtained by contacting the Lahontan Regional Water Quality Control Board.

Specific guidance for completing the Best Management Practices (BMP) Plan is provided below. The BMP Plan must be submitted with the Notice of Intent (NOI) to obtain coverage under the General Permit. Use the attached form for preparing the BMP plan.

Temporary Erosion Control

This element of the BMP Plan addresses temporary erosion control or soil stabilization measures to be implemented during the time while active construction and land disturbing work is active. The most efficient way to address erosion control is to preserve existing vegetation where feasible, limit disturbance, and stabilize and revegetate disturbed areas as soon as possible after grading or construction. Use of temporary erosion control measures is especially important on large graded sites where soil exposure to rainfall and wind can cause significant soil loss if left unprotected during the time active construction activities are conducted. Some of these measures may overlap with the permanent soil stabilization measures discussed later in the section. Until permanent vegetation is established, temporarily covering the soil is the most cost-effective and expeditious method to prevent and minimize erosion.

Indicate on the BMP Plan what methods will be used to prevent erosion from cut and fill slopes and other disturbed areas after grading activities are completed, but before permanent soil stabilization measures can be implemented. Options may include, but are not limited to:

- **Covering with mulch**
- **Temporary seeding or planting**
- **Applying soil stabilizers or binders (tackifier)**

Where background native vegetation covers less than 100 percent of the surface, such as in arid areas, the 70 percent coverage criteria is adjusted as follows: if the native vegetation on adjacent undisturbed areas covers 50 percent of the ground surface, 70 percent of 50 percent (.70 X .50=.35) would require 35 percent total uniform surface coverage.

Indicate on the BMP Plan what stabilization measures will be used at the site. Options may include, but are not limited to:

- **Seeding and/or planting (including hydro mulching/seeding)**
- **Mulching (wood chips, gravel, other) in combination with seeding/planting**
- **Installing erosion blankets (typically used on steeper disturbed slopes or unlined drainage ditches in combination with permanent seeding/planting)**
- **Placing rip rap**

Non-Storm Water Management

Non-storm water discharges should be eliminated or reduced to the extent feasible. Certain non-storm water discharges (e.g. irrigation of vegetative erosion control measures, pipe flushing and testing) may be necessary for the completion of some construction projects and are authorized by this General Permit. Other non-storm water discharges such as concrete washout, and driveway and street washing that would flush sediment or other pollutants to storm drains or surface waters are not allowed and would be a violation of this General Permit. De-watering waste should be discharged to land and infiltrated. A separate permit may be necessary if de-watering waste must be discharged to surface waters due to site constraints.

Indicate on the BMP Plan how unauthorized non-storm water discharges will be controlled. Options include, but are not limited to:

- **Approved off-site wash-out and wash-down areas**
- **Lined wash-out containment basins/traps**
- **De-watering waste infiltration or containment**

Spill Prevention and Control

The BMP Plan must describe measures to prevent and control potential leaks/spills of petroleum products such as fuels and lubricating materials, and other potentially hazardous materials. Secured storage areas for fuels and chemicals should be established and sufficient spill cleanup materials should be at the site to respond to accidental spills.

Indicate on the BMP Plan what spill prevention and control measures will be used. Options include, but are not limited to:

- **Covered material storage**
- **Material storage containment (berms, lined surfaces, secondary containment devices etc.)**
- **Regular equipment leak inspections**
- **Drip pans**
- **Absorbents**

BEST MANAGEMENT PRACTICES PLAN

Discharger Name: _____

Site Name: _____

Street Address: _____

City: _____

County: _____

Use the template provided below to identify BMPs to be implemented at the construction site. Check the boxes next to the BMPs that will be used. If other BMPs will be used, describe them in the space provided for "Other BMP." Attach additional sheets if needed.

TEMPORARY EROSION CONTROL

Erosion from graded or disturbed areas, including cut and fill slopes, will be temporarily protected once soil disturbing activities are completed by the following method(s):

- ❑ **Covering with mulch**
- ❑ **Temporary seeding or planting**
- ❑ **Applying soil stabilizers or binders (tackifier)**
- ❑ **Placing fiber rolls/logs on bare slopes**
- ❑ **Covering surfaces with erosion control blankets**
- ❑ **Diverting run off around disturbed areas using stabilized conveyances**
- ❑ **Other (describe below)**

BEST MANAGEMENT PRACTICES PLAN

STABILIZATION

Disturbed soil areas not covered with impervious surfaces will be permanently stabilized by the following method(s):

- ❑ **Seeding and/or planting (including hydro mulching/seeding)**
- ❑ **Mulching (wood chips, gravel, other) in combination with seeding/planting**
- ❑ **Installing erosion blankets (typically used on steeper disturbed slopes or unlined drainage ditches in combination with permanent seeding/planting)**
- ❑ **Placing rip rap (describe location)**
- ❑ **Other (describe below)**

NON-STORM WATER MANAGEMENT

Unauthorized non-storm water discharges will be controlled using the following method(s):

- ❑ **Approved off-site wash-out and wash-down areas (describe location)**
- ❑ **Lined wash-out containment basins/traps (describe location)**
- ❑ **De-watering waste infiltration or containment (describe location)**
- ❑ **Other (describe below)**

MAINTENANCE, INSPECTION, AND REPAIR

BMPs will be inspected and repaired in accordance with the following minimum program:

<u>For inactive construction sites during wet season</u> (October 15 – May 1) –

- ☐ **Cease construction through wet season and winterize (see Attachment "G")**

<u>For active construction sites during wet season</u> (October 15 – May 1) –

- ☐ **Inspect BMPs, and repair if needed, before and after storm events**
- ☐ **Inspect BMPs once each 24-hour period during extended storm events**
- ☐ **Implement repairs or design changes as soon as feasible depending upon worker safety and field conditions**
- ☐ **Have provisions to respond to failures and emergencies**
- ☐ **Other (describe below)**

ATTACHMENT "F"

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LAHONTAN REGION

WASTE DISCHARGE PROHIBITIONS
AND
EXCEPTION CRITERIA
FOR PROJECTS WITHIN THE TRUCKEE RIVER HYDROLOGIC UNIT

The *Water Quality Control Plan for the Lahontan Region* (Basin Plan) prohibits the discharge or threatened discharge, attributable to human activities, of solid or liquid waste[1] materials (including, but not limited to, soil, silt, clay, sand and other organic and earthen materials) to lands within the 100-year floodplain of the Truckee River or within the 100-year floodplain of any tributary[2] to the Truckee River. The Regional Board may grant exceptions to the prohibition for repair or replacement of existing structures provided that a loss of additional floodplain area or volume does not occur, and Best Management Practices and mitigation measures are used to minimize any potential soil erosion and/or surface runoff problems.

The Regional Board may also grant exceptions to the prohibition for the following types of new projects:

(1) Projects solely intended to reduce or mitigate existing sources of erosion or water pollution, or to restore the functional value to previously disturbed floodplain areas.

(2) Bridge abutments, approaches, or other essential transportation facilities identified in an approved county general plan.

(3) Projects necessary to protect public health or safety, or to provide essential public services.

(4) Projects necessary for public recreation.

(5) Projects that will provide outdoor public recreation within portions of the 100-year flood plain that have been substantially altered by grading and/or filling activities which occurred prior to June 26, 1975.

---

1 Waste includes earthen material placed in a water body or carried to waters by erosive forces. Construction activity involving ground disturbance within 100-year floodplain areas is generally considered to constitute a threat of discharge.

2 Tributaries include: perennial surface waters (rivers. streams, lakes, wetlands) and ephemeral (seasonal) watercourses exhibiting evidence of the occurrence of flowing water, and having the potential to transport water and/or sediment to another water body, including, but not limited to, named and unnamed streams, wetlands, and lakes.

ATTACHMENT "G"

LAHONTAN REGION
PROJECT GUIDELINES FOR EROSION CONTROL

In the interest of protecting surface water quality from unnatural or accelerated erosion caused by land development, the following guidelines shall be followed:

Guidelines Applicable To: **Little Truckee River Hydrologic Unit (HU No. 636.00)**
Truckee River Hydrologic Area (HU No. 635.20)
West Fork Carson River Hydrologic Unit (HU No. 633.00)
East Fork Carson River Hydrologic Unit (HU No. 632.00)
Mono Hydrologic Unit (HU No. 601.00)
Long Hydrologic Area (HU No. 603.10)

Temporary Construction BMPs

1. Surplus or waste materials shall not be placed in drainage ways or within the 100-year flood plain of surface waters.

2. All loose piles of soil, silt, clay, sand, debris, or earthen materials shall be protected in a reasonable manner to prevent discharge of pollutants to waters of the State. Material stockpiles should be placed on the upgradient side of excavation whenever possible. Stockpiles may also be protected by covering to prevent contact with precipitation and by placing sediment barriers around the stockpiles.

3. Dewatering shall be done in a manner so as to prevent the discharge of pollutants, including earthen materials, from the site. The first option is to discharge dewatering waste to land. A separate permit may be required if, due to site constraints, dewatering waste must be discharged to surface waters. Contact the Regional Board for information on discharging to surface waters.

4. All disturbed areas shall be stabilized by appropriate erosion and/or sediment control measures by October 15 of each year.

5. All work performed between October 15th and May 1st of each year shall be conducted in such a manner that the project can be winterized within 48 hours. Winterized means implementing erosion and/or sediment controls that will prevent the discharge of earthen materials from the site and the controls will remain effective throughout the rainy/snow season without requiring maintenance. In general, this requires stabilizing bare disturbed soils with mulch, erosion protection blankets, or other suitable materials, and installing perimeter sediment controls such as fiber logs or other similar materials that will remain effective during significant rain and snow events.

6. After completion of a construction project, all surplus or waste earthen material shall be removed from the site and deposited at a legal point of disposal.

7. All non-construction areas (areas outside of the construction zone that will remain undisturbed) shall be protected by fencing or other means to prevent unnecessary encroachment outside the active construction zone.

8. During construction, temporary erosion control facilities (e.g., impermeable dikes, filter fences, hay bales, etc.) shall be used as necessary to prevent discharge of earthen materials from the site during periods of precipitation or runoff.

ATTACHMENT "H"

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LAHONTAN REGION

STANDARD PROVISIONS
FOR WASTE DISCHARGE REQUIREMENTS

1. Inspection and Entry

The discharger shall permit Regional Board staff:

a. to enter upon premises in which an effluent source is located or in which any required records are kept;

b. to copy any records relating to the discharge or relating to compliance with the waste discharge requirements;

c. to inspect monitoring equipment or records; and

d. to sample any discharge.

2. Reporting Requirements

a. Pursuant to California Water Code 13267(b), the discharger shall immediately notify the Regional Board by telephone whenever an adverse condition occurred as a result of this discharge; written confirmation shall follow within two weeks. An adverse condition includes, but is not limited to, spills of petroleum products or toxic chemicals, or damage to control facilities that could affect compliance.

b. Pursuant to California Water Code Section 13260 (c), any proposed material change in the character of the waste, manner or method of treatment or disposal, increase of discharge, or location of discharge, shall be reported to the Regional Board at least 120 days in advance of implementation of any such proposal. This shall include, but not be limited to, all significant soil disturbances.

c. The owner(s) of, and discharger upon, property subject to waste discharge requirements shall be considered to have a continuing responsibility for ensuring compliance with applicable waste discharge requirements in the operations or use of the owned property. Pursuant to California Water Code Section 13260(c), any change in the ownership and/or operation of property subject to the waste discharge requirements shall be reported to the Regional Board. Notification of applicable waste discharge requirements shall be furnished in writing to the new owners and/or operators and a copy of such notification shall be sent to the Regional Board.

d. If a discharger becomes aware that any information submitted to the Regional Board is incorrect, the discharger shall immediately notify the Regional Board, in writing, and correct that information.

modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any of the waste discharge requirements conditions.

8. Property Rights

The waste discharge requirements do not convey any property rights of any sort, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations.

9. Enforcement

The California Water Code provides for civil liability and criminal penalties for violations or threatened violations of the waste discharge requirements including imposition of civil liability or referral to the Attorney General.

10. Availability

A copy of the waste discharge requirements shall kept and maintained by the discharger and be available at all times to operating personnel.

11. Severability

Provisions of the waste discharge requirements are severable. If any provision of the requirements is found invalid, the remainder of the requirements shall not be affected.

12. Public Access

General public access shall be effectively excluded from treatment and disposal facilities.

13. Transfers

Providing there is no material change in the operation of the facility, this Order may be transferred to a new owner or operation. The owner/operator must request the transfer in writing and receive written approval from the Regional Board Executive Officer.

14. Definitions

a. "Surface waters" as used in this Order, include, but are not limited to, live streams, either perennial or ephemeral, which flow in natural or artificial water courses and natural lakes and artificial impoundments of waters. "Surface waters" does not include artificial water courses or impoundments used exclusively for wastewater disposal.

b. "Ground waters" as used in this Order, include, but are not limited to, all subsurface waters being above atmospheric pressure and the capillary fringe of these waters.

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LAHONTAN REGION

MONITORING AND REPORTING PROGRAM NO. R6T-2003-0004
GENERAL WASTE DISCHARGE REQUIREMENTS

FOR

SMALL CONSTRUCTION PROJECTS, INCLUDING UTILITY, PUBLIC WORKS, AND MINOR STREAMBED/LAKEBED ALTERATION PROJECTS
LAHONTAN REGION
EXCLUDING THE LAKE TAHOE HYDROLOGIC UNIT

A. An inspection of the construction site shall be made daily during active construction and monthly during long periods of inactivity (e.g. winter), by the Discharger, resident engineer, superintendent, general contractor, or equivalent. The purpose of the inspection is to discover potential water quality problems at the construction site so that the Discharger can implement corrective measures. The following items should be inspected at the site, as applicable:

1. Damaged containment dikes or erosion fencing
2. Unauthorized access by vehicles and/or sediment tracking off the site
3. Boundary fence damage or removal
4. Disturbed areas with no erosion control protection
5. Evidence of any sediment leakage through erosion control fencing or containment dikes
6. Soil piles unprotected or located in drainage ways
7. Spilled chemicals, paints, fuels, oils, sealants, etc.
8. Upstream runoff diversion structures in place and operational
9. Any signs of downstream erosion from runoff discharges
10. Sediment accumulation within onsite storm water drainage facilities

B. Following completion of project construction, the Discharger shall submit a notice of completion and request for revocation of coverage under the permit. The notice of completion should include the following information:

1. Details on any modification from the construction plans to the proposed stormwater collection, treatment, or disposal facilities.

2. Details on any changes to the amount of impervious coverage for this project.

3. Any significant problems which occurred during project construction and remedial measures taken.

4. Statement that onsite stabilization/revegetation measures have been completed.

5. Certification that project is in compliance with the requirements of the General Permit.

The final report shall contain the name of the project and shall be signed and dated by the property owner or his legal representative. The report shall be submitted to the Regional Board office in South Lake Tahoe.

Ordered by Harold J. Singer Date: Jan 8, 2003
HAROLD J. SINGER
EXECUTIVE OFFICER

BA/cgT: Small Construction M&R

APPENDIX G

Letter to Sierra Business Park Owners' Association

Mono County
Community Development Department

P.O. Box 347
Mammoth Lakes, CA 93546
(760) 924-1800, fax 924-1801
commdev@mono.ca.gov

Planning Division

P.O. Box 8
Bridgeport, CA 93517
(760) 932-5420, fax 932-5431
www.monocounty.ca.gov

May 28, 2019

Mr. Greg Cook
President, Sierra Business Park Owners' Association (SBPOA)

Sent via email: greg@gcforestproducts.com

Dear Mr. Cook:

This notice is to inform the SBPOA that the Mono County Community Development Department (CDD) has become aware of a discrepancy between the water demand studied in the SBP Specific Plan and EIR (SP & EIR) and the water demand estimated in the Sierra Business Park Water System: Technical, Managerial and Financial (TMF) document. The SP & EIR estimated a maximum water demand of 27,000 gallons per day (gpd) for the SBP, and the original TMF from July 2000 matched the 27,000 gpd figure. However, the 2005 update to the TMF increased the estimated maximum daily water demand to 42,870 gpd. The discrepancy between the figures in the TMF and the SP & EIR may create a compliance issue if the SBP's water use exceeds the range studied in the SP & EIR and may also have water use implications for future projects in SBP.

The SP & EIR estimated water consumption using low and high demand scenarios ranging from 6,800 gpd (185 gpd/acre) to 27,000 gpd (735 gpd/acre). The low demand estimate was based on average water consumption factors for the existing industrial park in Mammoth Lakes (as obtained from Mammoth Community Water District) and the high demand scenario applied the characteristics of the batch plant to SBP. The high demand scenario estimated that the maximum water demand would be 735 gallons per day per acre (gpd/acre) and 27,000 gpd for total project demand in the SBP.

The TMF was updated in 2005 as part of the process for obtaining a water supply permit for the SBP. The update included the addition of water demand from outside hose bibs (1,890 gpd), an update to the average daily sewage demand from 200 gpd (7,400 gpd for SBP) to 250 gpd (9,250 gpd for SBP) due to a new mandated standard from the Lahontan RWQCB, and a new maximum daily demand for the concrete batch plant of 16,500 gpd (occurring two or three times a year) of which the typical maximum daily demand is estimated to be approximately 4,330 gpd.

Based on personal communication with Clay Murray on 03/27/19, the County understands that current water use in the SBP is below the range studied in the SP & EIR. The existing average daily water demand in December (representative of water use in winter) is estimated to be 634 gpd for SBP and the total average daily demand in summer is estimated to be approximately 20,000 gpd. These figures are well below the range studied in the demand scenarios in the SP & EIR, however, the addition of Bask Ventures Inc.'s water demand of approximately 800 gpd - 1,000 gpd, the batch plant's maximum daily demand figure of 16,500 gpd (occurring two to three

times per year), and additional water demand from future projects could cause the water use in the SBP to fall out of compliance with the range studied in the SP & EIR.

In order to remain in compliance with the SBP Specific Plan, water use in the SBP should not exceed the 27,000 gpd maximum daily water demand studied in the SP & EIR. Water use will need to be monitored closely and analyses of water use for the remaining undeveloped parcels will need to be documented to ensure maximum amounts are not exceeded. The worst-case scenario is that a future development may not be approved if it would exceed the maximum daily water demand.

If the SBPOA determines that there is a need to increase the maximum water use at the SBP, options exist to do so without triggering compliance issues. Please contact Mono County to schedule a meeting to discuss these options.

If you have any questions regarding this letter, please contact Kelly Karl at (760) 924-1809 or kkarl@mono.ca.gov or me at (760) 924-1814 or wsugimura@mono.ca.gov.

Thank you,

Wendy Sugimura
Director, Community Development Department
PO Box 347
437 Old Mammoth Road STE 220
Mammoth Lakes, CA 93546