

BASK, INC. - FAIRHAVEN

Security Policies & Procedures *updated on 5/12/2020*

SECTION I — INTRODUCTION

Overview

BASK, INC. (“BASK”), a Colocated Medical Use and Adult Use Operation (CMO) has prepared and developed security policies and procedures to provide for the safe, orderly, and legal distribution of cannabis and cannabis products. The Fairhaven CMO is for Medical and Adult Use retail sales only. There is no cultivation or processing of cannabis products on site. The following policies and procedures are necessary to ensure the safety and security of employees, patients and customers.

Security Program Management Roles and Requirements

- Under the supervision of the Chief Executive Officer, the Director of Security (DoS) is responsible for the development and overall management of the Security Policies and Procedures for BASK.
- The DoS is responsible for implementing and administering the Security Policies and Procedures as prescribed as well as any approved changes.
- DoS shall provide security administration and management for BASK
- DoS shall ensure BASK agents undergo required background screening prior to being granted access to the premises and/or offered employment, including but not limited to screening of financial history, criminal history, previous employment, and known affiliations, among others.
- DoS shall ensure secure storage and work spaces are properly monitored and safeguarded and that all finished cannabis is stored in a secure, locked vault in such a manner as to prevent diversion, theft or loss.
- DoS shall ensure compliance and adherence to the provisions outlined in the Cannabis control Commission regulations, “Colocated Adult-Use and Medical-Use Marijuana Operation,” 935 CMR 502.000.
- DoS shall serve as the primary point of contact for public safety for all security-related matters.
- DoS shall establish and maintain a secure visitor management program, including a visitor log.
- DoS shall provide initial security training program for new agents as well as annual training for all BASK agents.

- DoS in conjunction with the Delivery Manager will establish and maintain safe and secure policies and procedures for transportation.
- The DoS will continuously develop and update emergency policies, procedures and SOP's for securing all product following any instance of diversion, theft or loss of cannabis or cannabis products and will conduct an assessment to determine whether additional safeguards are necessary.
- Director of Security will ensure smoke and fire alarms will be tested on a monthly basis and fire extinguishers and the fire suppression system is tested/inspected on an annual basis.
- The Director of Security will perform and document an annual fire evacuation drill in consultation with the Fairhaven Fire Department.
- Fire evacuation maps will be clearly posted around the Bask facility and agents will review the maps on an ongoing basis.
- The Director of Security, in collaboration with the Chief Executive Officer, will update the Security Policies and Procedures as needed; at a minimum the Security Policies and Procedures will be updated/reviewed on an annual basis.
- Managers are responsible for ensuring security measures within each division of BASK
- BASK agents with approved access to products are responsible for the product when in their control. Agents will also be responsible for safeguarding any cannabis and cannabis products that come into their possession while performing assigned duties.
- Agents will promptly report any safety or security concerns regarding agents, registered patients, registered caregivers or visitors to the Director of Security. This includes any information that reflects adversely upon the integrity or general character of an agent; information which indicates that the agent's ability to safeguard marijuana product, confidential patient information, any other information which may jeopardize BASK in any way may be impaired; and any information that may adversely affect the security and safety of the premises.
- Access to cannabis and cannabis products will be limited to BASK agents who have a need and who are also capable of safeguarding such products. Unauthorized agents and visitors will not have access to marijuana or marijuana products.

SECTION II —BUILDING SECURITY

Employee Security Policies

- Employees will ensure that Bask facilities and limited access areas are only accessed by authorized personnel and individuals.
- Access to Bask facilities is limited to Bask agents and those persons allowed access by the state. All employees must be registered and licensed.
- Agents will be assigned access keys, cards, and personal security codes to areas that are essential to their jobs at determined by the Bask Chief Executive Officer. Agents are responsible for protecting their access keys, cards, and codes from unauthorized use.

- All employees must always wear their badge in a visible, above-the-waist location.
- State or federal inspectors/employees may arrive for an inspection announced or unannounced and shall be granted access to any area of the facility, as requested.
- There is no unauthorized recording or taking photos inside the facility.
- An employee may not receive any type of consideration or compensation for allowing a visitor to enter a limited access area.
- Emergency visitors, e.g., emergency medical professionals or law enforcement, etc., will be signed-in per local procedures.
- Employees will be trained to use and understand security procedures and equipment as necessary in the event of an emergency.
- Five panic buttons are placed throughout the facility. If safe to do so, these buttons must be used if intruders enter the facility, a robbery occurs, or if the safety of any employee or authorized visitor becomes threatened.
- If at any time the access controls are lost or compromised, the employee must notify their supervisor immediately and assist with the recovery process as necessary.
- Employees will properly store and secure all cannabis and cannabis products.
- Employees must never place product in a location other than the designated areas within limited access areas.
- Employees are responsible for supervising all product throughout their shift.
- Any product being shown to a visitor must immediately be placed back in the product's designated area. No product may be left unsupervised at any time.
- All expired, contaminated, or unusable product must be properly recorded and stored.
- The inventory manager is responsible for approving all waste and inventory loss. Each occurrence will be reviewed and recorded in a data collection repository, which will be reviewed for trends and patterns.
- The inventory manager will investigate and implement procedure variations to mitigate waste and inventory loss.
- All inventory losses, regardless of the reason, will be reported to the Chief Executive Officer (CEO) and the Director of Security. All losses will be investigated by the inventory manager in collaboration with the CEO and Director of Security. Access to all storage areas, including the vault room, will be immediately limited to the Inventory Manager, Bask President, CEO and Director of Security and will remain so until the cause of the discrepancy is found. Also, see section on Incident Reporting

Proximity Access Cards and Keys

- In addition to the identification badges worn by all agents, proximity card readers will secure all Limited Access Areas and will only be issued to those agents who require access to Limited Access Areas to complete job functions.
- Loss of access cards will be immediately reported to the DoS who will deactivate the card forthwith.
- Access Cards will be issued and accounted for in Bask's Access Card database and be maintained in accordance with Bask's recordkeeping requirements.
- Each access card will grant access to specific zoned areas as necessary to agent's job responsibilities for authorized access; access will be limited as necessary.
- The Chief Executive Officer shall determine which Bask agents have access to each limited access area by key and access cards.

- Unless otherwise authorized by the Chief Executive Officer, all keys and access cards must remain on the premises. See Access Card and Key Control SOP's
- Keys will be kept at the Adult Use (south) security station. Security agents will provide use of keys only to those authorized to have them and only for the time necessary for Bask agents to carry out their duties. A key log will be maintained in the Adult Use security post to account for the use of all keys including the date, time, and name of agent checking out and returning the key.
- Bask security agents, under the direction of Director of Security will responsible for tracking all keys in accordance with the Bask Key Control SOP.
- Bask agents will never leave a key in a lock and anyone finding a key left in a lock will immediately report that fact to the security agent on duty. Any agent finding a lock not in good working order will immediately report that fact to a security agent on duty who will contact the Facilities Manager to arrange for replacement.935 CMR 502.110
- Bask will have security agents on site as-needed according to operational needs and requirements.

Authorized Visitor Access

Only qualifying customers over the age of 21, registered qualifying patients, personal caregivers, Bask agents, vendors, contractors, and authorized visitors are allowed access to a Bask facility.¹ For the purpose of this policy and for Bask Operations, the term “visitor” shall have the meaning ascribed to it pursuant to 935 CMR 502.002: “...an individual, other than an MTC agent or Laboratory Agent, authorized by the CMO or Independent Testing Laboratory to be on the premises of the CMO for a purpose related to its operations and consistent with the objectives of M.G.L.c941, and 935 CMR 502.00.”

Visitors must enter the Medical entrance and report to the Medical security post. They must have a specific reason to be permitted to a Bask facility, and visitors must leave immediately when the purpose of the visit is fulfilled..

A visitor is prohibited from working with any cannabis or cannabis-infused products (CIPs). All consultants, vendors, contractors, or individuals who work with cannabis or CIPs must be registered Bask agents. Bask will not employ an individual to work on the premises until the individual has been approved by the CCC as a registered agent. Work, including training, will commence only after such approval.

Visitor Log and Admittance

All visitors must sign the Visitor Log in the Medical Use security post and complete any and all necessary fields of the Visitor Log, including full first and last names; contact information; the time in which they were permitted access to the Bask facility; and the purpose of their visit (which must include the name of any affiliated organizations or firms that the visitor is present

¹ Representatives of the Cannabis Control Commission acting in accordance with their responsibilities and emergency responders acting in the course of responding to an emergency shall have access to Bask facilities. Other authorized law enforcement personnel or local public health, inspectional services, or other permit-granting agents acting within their lawful jurisdiction, and only as necessary, may also have access to Bask facilities.

on behalf of). Security personnel must inspect a visitor's driver's license (or other valid photo identification), ensure that the Visitor Log is properly completed, and confirm that the visitor is at least 21 years old.

Each visitor must be issued a Visitor ID Badge and must visibly display the Visitor ID badge at all times while at a Bask facility. Visitor ID Badges will be numbered and accounted for daily. Security personnel will not admit any visitor until:

1. The purpose of the visit has been verified with Bask management, as necessary;
2. A Bask agent on duty is assigned to the visitor to escort the visitor while in the Bask facility (including and especially at all times while the visitor is in a Limited Access Area);
3. The assigned Bask agent greets the visitor in the vestibule (while maintaining all Bask security protocols and in accordance with CCC regulations); and
4. The Visitor Log for that visitor has been completed (including verification of ID and age).

Visitor log will be maintained in the Medical entrance security post. Completed log sheets shall be stored and retained by the Director of Security

At the conclusion of the visit, the visitor will be logged out by security and the Visitor ID Badge must be returned. The Visitor Log and Visitor ID Badges will be reviewed daily by security to ensure adherence to policy. All logs shall be available for inspection by the CCC at all times.

Non-Caregiver Visitors Escorting Registered Patients

In special circumstances where a patient asks to be accompanied by an individual who is not a registered personal caregiver and the patient states or it is apparent that the patient has a special need (such as a need for physical assistance), Patient Education must be notified immediately.

A Patient Education Specialist (PES) will speak to the patient regarding the request and make a needs assessment. If the PES determines that the patient requires the support of the individual and the individual is at least 21 years old (as verified by security personnel), the PES may determine that the individual may log-in as a visitor for the sole purpose of supporting the patient. The visitor must then complete the Visitor Log (and any processes thereto), as well as any relevant sections of the Non-Caregiver Visitor Form. A PES shall then consult with the patient and visitor and provide written guidance explaining the steps to appoint a personal caregiver. The PES shall document in the Non-Caregiver Visitor Form the reason(s) that the patient needed the support of the visitor (and complete all other sections of the Non-Caregiver Visitor Form).

A Bask agent shall escort the patient and visitor in and out of the Bask facility. Registered patients and visitors accompanying them will only be permitted in the dispensary area (i.e. retail area) of Bask and are prohibited from remaining on the premises once the purpose of their visit has been completed.

Signage

In order to ensure and maintain compliance with 935 CMR 502.000 and all Bask policies, Bask will clearly post signage throughout the Bask facility.

Bask will post the following notice in the security station where visitors are logged in:

“Under NO circumstances can a visitor be in a Limited Access Area without a Bask agent physically with them at all times. No exceptions. Security personnel is also required to monitor visitors in Limited Access Area on camera to ensure compliance.”

In addition to the signage requirements of 935 CMR 105.110(4)(a), a sign shall be posted outside of any Limited Access Area that states the following:

**THIS IS A LIMITED ACCESS AREA.
VISITORS MUST BE WITH A BASK AGENT AT ALL TIMES AND
MUST:**

- **BE AT LEAST 21 YEARS OLD;**
- **BE LOGGED INTO THE VISITOR LOG;**
- **WEAR A VISITOR ID BADGE SO THAT IT IS VISIBLE AT ALL TIMES; AND**
- **LOG OUT AND RETURN VISITOR ID BADGE PRIOR TO EXIT.**

Perimeter Controls, Monitoring, and Controlled Access

Perimeter security includes lighting, CCTV cameras, indoor motion sensors, glass break detectors and door contacts

- Individuals who are not engaged in an activity permitted under 935 CMR 502.000 are prohibited from the premises of BASK.
- Proper lighting will be used and maintained at all times, including after normal business hours, in and around BASK. The lighting will include areas around the premises including entry and exit points, parking areas, and the perimeter fence lines.
- Foliage on the premises will be maintained in a manner that does not allow persons to conceal themselves from sight.
- All entry points and perimeter windows will be alarmed.
- The perimeter will be monitored by security checks and monitoring the surveillance cameras.

- The Bask security agent assigned to the exterior of the building shall continuously patrol and inspect the outside of the building and prevent loitering and consumption of cannabis on Bask premises

Building Access Controls

Access will be controlled by card proximity readers and monitored using cameras, and a buzzer system, and intercom. In addition, security agents are able to view individuals from both the south and east security posts as they approach the Dispensary via camera monitoring system.

Security Checks and Inspections

The Director of Security or designated security agents will conduct regularly scheduled security checks of the BASK facility and of the premises. As an added precaution, areas within BASK will be routinely checked throughout the day and at the beginning and close of each operational period to ensure that materials, equipment, and product rooms appear to be properly maintained.

Prohibited Items and Weapons

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

Intrusion Detection Systems (IDS)

The Security System is Avigilon Access Control, Avigilon CCTV, and Bosch alarm/intrusion. The Bosch alarm/intrusion system will report to a primary central station and a backup central station

The custom IDS include intrusion detection, camera monitoring, fire alarms, motion sensors, and proximity reader components, among other features. All entry/exit points are armed with door contact switches and motion sensors. Areas with glass windows or doors also have glass break detectors. There are five panic buttons were installed located throughout facility. Notification for panic alarms is automatic and direct to the central monitoring stations, who will notify the appropriate law enforcement agencies. This will also be displayed on the Security Workstation in the Security room.

- Central Monitoring Station:
 - The IDS have multiple redundancies in place to ensure connectivity with the central monitoring station including, but not limited to, a secure connection using digital, wireless, and radio-controlled frequencies.
 - When the central monitoring station detects an intrusion, malfunction or tampering security agents, law enforcement, and management will be notified within five (5) minutes after the failure, either by text message, email or telephone. If needed, repairs to the IDS system will be made immediately or within a maximum 24-hour period.

- IDS Operations
 - The IDS will have all external zones activated 24-hours a day, and internal zones will be armed at closing time. A daily record will be maintained at BASK identifying the person responsible for setting and deactivating the IDS.
 - A failure to activate or deactivate will be reported to the Director of Security and a record will be maintained for at least ninety (90) days.
 - Records will also be maintained for ninety (90) days indicating time of receipt of alarm, name of security staff responding, time of dispatch to BASK, response time security staff arrived at the alarm location, nature of alarm, and relevant response actions.
- Security/Surveillance Rooms
 - All security system equipment and recordings will be maintained in the secure Security Server room that can only be accessed using an access card and entering a PIN
 - The room designated for security equipment or records storage will be limited to those agents that are essential to surveillance operations, law enforcement authorities, authorized security system service personnel, and the CCC.
 - A current list of authorized agents and service personnel that have access to designated security rooms will be made available to the CCC upon request.
- Power Outage
 - BASK has separate power source that will provide electricity to all security systems in the event of a power outage. This power source will remain independent from the main power source. A generator log will be maintained in the Adult Use security post to record starting and ending times of generator use including testing.
 - BASK will immediately notify appropriate law enforcement authorities and the CCC within twenty-four (24) hours in the event of a failure of any security alarm system due to a loss or electrical power or mechanical malfunction that is expected to last longer than eight (8) hours.

Video Surveillance

- The CCTV system is a Avigilon system
- As required by 935 CMR 502 video recordings will allow for the exporting of still images in an industry standard image format, including .jpg, .bmp, and .gif. Exported video will have the ability to be archived in a proprietary format that ensures authentication of the video and guarantees that no alteration of the recorded image has taken place. Exported video will also have the ability to be saved in an industry standard file format that can be played on a standard computer operating system. All recordings will be erased or destroyed prior to disposal.
- Video surveillance cameras are located in all areas that may contain cannabis or cannabis products including all points of entry and exit to BASK, the perimeter of the building, and in all parking lot areas. In addition, the following requirements will be met:

- Cameras will be directed at all areas where cannabis is prepared, stored, handled, and dispensed.
- Camera placement is capable of clearly capturing any person entering/ exiting BASK.
- All video recordings contain a date/time stamp.
- Cameras will be angled to capture a clear and certain identification any person entering/exiting BASK or restricted area and lighting conditions will be appropriate for the area under surveillance.
- Video cameras will be capable of producing clear, color, high-resolution photo (live or recorded), and images will include date/time frame recording that does not obscure the photo. Twenty-four hour recordings from all video cameras will be available for immediate viewing by the CCC upon request. These recordings will be retained for a minimum of ninety (90) days, will not be destroyed or altered, and will be retained as long as necessary if BASK is aware of a pending criminal, civil or administrative investigation for which the recording may contain relevant information.
- All security equipment (cameras, alarms, etc.) will be kept in working order and subject to inspection and testing at intervals not to exceed thirty (30) calendar days from the previous inspection
- Security cameras will be monitored by agents in both the east and south security posts

Redundant Notification Systems

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

Internal Alarms

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

Secure Storage Areas & Vaults

- Storage areas and vaults will have clearly posted Limited Access Area signs and be monitored by additional security measures, including surveillance in the room, and motion detection all of which are part of the IDS. The minimum number of authorized agents essential for efficient operation will be granted access to storage areas and vaults. A list of authorized agents will be kept and maintained by the Director of Security and updated as needed.
- Vault access will require utilizing a combination smart card reader plus PIN code. UPS units are in place for security devices installed at or within the limited access areas, with at least two hour backup time.
- Cash will be stored in a safe located within the vault and inventory will be stored in the vault at all times and never commingled in the same container.

Access Control to Limited Access Areas (935 CMR 502.110 (4))

Limited Access Area is defined as a building, room or other indoor or outdoor area on the premises of a dispensary (935CMR501.002) where cannabis, MIP's or their byproducts are cultivated, stored, weighed, packaged, processed or destroyed limited to only CTO and laboratory agents in the course of their responsibilities, Commission designees and law enforcement authorities acting within their lawful jurisdiction

- Limited Access Areas will be clearly identified with a posted sign that will be a minimum of 12" x 12" and states "DO NOT ENTER – LIMITED ACCESS AREA – ACCESS LIMITED TO AUTHORIZED PERSONNEL ONLY"
- The minimum number of authorized agents essential for efficient operation will have access to inventory, cash, and management offices. Access will be restricted using zoned proximity reader key cards and by maintaining internal automatic locking doors.
- BASK agents will visibly display their BASK ID badge while performing job duties on-site or off-site.
- At the discretion of the Director of Security, any item may be identified and prohibited that could be used for diversion, may be identified and prohibited in the limited access areas or in the dispensary if products are displayed.
- Security agents monitor security cameras throughout the day and will immediately alert the Director of Security or the CEO as to any suspicious activity in the limited access areas.
- All outside vendors, contractors, and visitors must obtain a visitor identification badge at the medical entrance security post prior to entering a limited access area, and shall be escorted at all times by an RMD agent authorized to enter the limited access area. The visitor identification badge must be visibly displayed at all times while the visitor is in any limited access area. All visitors must be logged in and out, and that log shall be available for inspection by the Commission at all times. All visitor identification badges shall be returned to the RMD upon exit.

Security System Audit

In addition to the monthly security system inspection, BASK will perform a security system audit using an external vendor on an annual basis. The audit report will be submitted to the CCC no later than thirty (30) calendar days after the audit is conducted. In the event that the audit identifies areas for improvement related to security system, BASK will also submit a plan to mitigate those concerns within ten (10) business days. 935 CMR 502.110 (1)(b)

SECTION III - COLOCATION

Medical Cannabis patients and Adult Use customers will be physically separated while on the premises. Patients will be directed by security agents and signage to enter and exit the east side doors while customers will use the south side doors. There will be security posts at both entrances, separate lines and separate points of sale. Notwithstanding the foregoing, medical patients will be free to use either entrance. 935 CMR 502.140 (6)

Medical Use

All patients and caregivers must be registered and qualified to enter the dispensary, and at minimum be in possession of a valid Medical Marijuana ID Card issued by the Cannabis Control Commission (CCC) and a driver's license, government-issued ID card, military identification card, or a passport. Registered patients and caregivers will only be permitted in the Dispensary area (i.e. retail area) of BASK and are prohibited from remaining on the premises once the purpose of their visit has been completed.

- All patients and caregivers will be verified in the CCC MMJ Online System before being admitted to the Dispensary.
- The agent at the Medical Use (East) entrance will verify the patient and caregiver, if one is present, possesses the foregoing documents prior to admission to the facility
- Patients must be 18 years or older (502 CMR 140 (2) (a))
- Patients under the age of 18 must be accompanied by a caregiver with an active patient registration card
- All registered patients and caregivers will be checked-in when entering and checked-out when exiting the building utilizing the Biotrack system.

Quantity Limits Medical Use

In compliance with the regulations set forth by the CCC, BASK will observe and enforce strict quantity limits for all qualifying patients. Purchases will be documented and monitored. Dispensary agents will verify the defined calendar day length (determined by the certifying physician) of the patient's certification to ensure the certification is valid at the time of the visit and the amount of cannabis dispensed does not exceed quantity limits. A registered patient will be able to obtain a maximum of a sixty (60) day supply of medicine, with a maximum of ten (10) ounces of medical cannabis per sixty (60) day supply, unless one of the following situations is applicable:

- For a registered qualifying patient certified for *less than 60 days*, the amount of cannabis dispensed, including cannabis contained in CIPs, shall be no more than the appropriate proportion of a 60-day supply, as defined in 935 CMR 501.002.
- For a registered qualifying patient certified for Initial Access, the amount of cannabis dispensed, including cannabis contained in CIPs, shall be no more than a 14 day supply. A 14 day supply is 2.5 ounces unless otherwise determined by a Certified Healthcare Provider in accordance with 935 CMR 105.002 and Guidance from the CCC entitled, "Initial Access Certification Instructions for MTC Agents".

- For a registered qualifying patient certified for *60 days or longer*, the amount of cannabis dispensed, including cannabis contained in CIPs, shall be no more than a 60-day supply in each 60-day period as defined in 935 CMR 501.002 (e.g. a patient certified for 90 days may receive up to ten ounces in the first 60 days and five ounces in the remaining 30 days, while a patient certified for 180 days may receive up to ten ounces in each 60-day period).
- For a registered qualifying patient whose certifying physician has determined that he or she requires a 60-day supply in excess of 10 ounces in accordance with 935 CMR 105.010(9), the amount of cannabis dispensed, including marijuana contained in CIPs, pursuant to 935 CMR 105.501.140(3)(2)(b) shall be adjusted accordingly.

Adult Use

At a minimum, there will be a Bask security agent outside the Adult Use entrance and one inside the east security post in the east to verify that anyone seeking entrance is 21 years or older as verified by a state issued ID. Upon verification, they will be directed to the line for Adult Use points of sale delineated by retractable belt stanchions. Signage and staff will direct exiting customers to the south side doors by signage and barriers. Customers are prohibited from remaining on the premises once the purpose of their visit has been completed. The no loitering and no consumption on premises prohibition will be enforced by a security agent assigned to the exterior of the premises. 935 CMR 502.110 (1)(b)

Quantity Limits Adult Use

A retail customer determined to be 21 years of age or older may purchase no more than one ounce of cannabis or its dry weight equivalent in concentrate or Edible Cannabis Product per day. The point of sale system shall alert a sales agent when someone is attempting to purchase more than that amount in a day.

SECTION IV —AGENT SECURITY

ID Preparation

Identification Badging

- Each Bask agent shall have completed a background check, been determined to be suitable by Bask, and be in possession of a Bask agent card issued by the CCC prior to starting their employment at Bask

- BASK agents will visibly display their agent cards at all times while performing their assigned job duties, whether on or off-site.
- Badges must be worn on the outer garment, above the waist. Neck lanyards are acceptable to display badges.
- To help ensure that agents will always have their cards while working, Bask agents are required to leave their agent and access cards at Bask at the completion of their workday or shift unless working for Bask off site.
- The CCC shall be notified within 24 hours when a Bask agent is terminated from employment or otherwise no longer associated with Bask. The DoS shall immediately deactivate the access cards of the person no longer associated with Bask.
- Prior to **ID** preparation for a new agent, the Director of Compliance will ensure that all required background checks have been completed and documented and the Director of Security will ensure that the agent is granted the appropriate level of access for the job the agent will be performing.

Proximity Access Cards

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

Section – V- Personal Safety and Crime Prevention

Agents will be familiar and comply with all BASK Security policies and SOP's including The Emergency Action Plan.

Personal safety of all agents, employees and visitors is paramount. In no instances shall anyone place themselves in a position of personal jeopardy in order to protect product.

As stated elsewhere in these policies and SOP's, agents or employees shall not attempt to restrain or engage in combat with an intruder unless they have no other option than to defend themselves. In the event of observing or being warned of an intruder, agents shall activate any proximal panic alarms, ensure Limited Access doors are secure (as long as that action does not place them in personal jeopardy) and sequester themselves in a safe, locked area and await response by public safety personnel.

Except in an emergency evacuation of the building, security agents will maintain camera surveillance of all persons leaving the building to ensure they reach their vehicle in the parking lot safely. Security agents, who observe a suspicious person or vehicle in the parking lot or other exterior areas of the property, shall prevent any agent/employee from leaving the facility until it is evident the suspicious activity is legitimate and does not pose a safety risk to persons exiting the building.

Security agents will contact the Fairhaven Police Department to report any suspicious activity that does not expeditiously prove to be legitimate including any loitering. 935 CMR 502.110 (1) (b)

- Agents will promptly report any safety or security concerns regarding agents, consumers, or visitors to the Director of Security. This includes any information that reflects adversely upon the integrity or general character of an agent; information that indicates the agent's inability to safeguard cannabis, cannabis product, or any other information that may jeopardize Bask's operations in any way; and any information that may adversely affect the security and safety of the premises.
- Employees will be trained to use and understand security procedures and equipment as necessary in the event of an emergency.
- Five panic buttons are placed throughout the facility. If safe to do so, these buttons must be used if intruders enter the facility, a robbery occurs, or if the safety of any employee or authorized visitor becomes threatened.
- If at any time the access controls are lost or compromised, the employee must notify their supervisor immediately and assist with the recovery process as necessary.
- It is the responsibility of every employee to aid in the security of Bask through prevention, awareness, reporting, and responsible incident management.
- Employees will properly store and secure all cannabis and cannabis products.
- Employees must never place product in a location other than the designated areas within limited access areas.
- Employees are responsible for supervising all product throughout their shift.
- The Director of Security will train Bask employees to identify suspicious behavior and to be observant of their surroundings.

Additional Agent and Physical Risk Reduction Measures

- Agents suspected of diversion will be reported to the Fairhaven Police Department;
- Surveillance cameras in Limited Access Areas and all areas considered to be high risk for the occurrence of diversion will continuously monitored by security agents;
- Vaults monitored by multiple security monitors and systems at all times
- Limited Access Areas and Restricted Access Areas clearly marked, secured, and monitored at all times;
- Security checks are in place at both the Medical and Adult use entrances to ensure unauthorized individuals do not gain access to the BASK facility; and
- Agents are trained to verify patient and caregiver registrations using the CCC online system as well as to check for quantity limits for each patient prior to completing a sale.

- Agents suspected of being under the influence of cannabis, alcohol or other foreign substance will be escorted out of the building and safe transportation arranged. Any agent insisting on operating a motor vehicle will be reported to the Fairhaven Police Department.

SECTION VI — EMERGENCY ACTION PLAN

PURPOSE

The purpose of this plan is to ensure employee and visitors safety from fire and other emergencies in the workplace. That includes, at a minimum, delineating conditions under which an evacuation is necessary and those in which it may be better to shelter in place. Further, to provide an orderly evacuation of personnel from the Bask Fairhave facility, if warranted, in order to ensure the safety of all employees, patients, customers and visitors in the event of emergency requiring evacuation of the premises. It further provides for a prompt and accurate accounting of all personnel at the designated assembly point to ensure no one remains in the building

WORKPLACE EMERGENCIES

A workplace emergency is an unforeseen situation that threatens employees and visitors on the premises; shuts down operations or causes physical or environmental damage. Emergencies can be natural or man made and include the following:

- Fire and/or Fire Alarm Activation
- Hurricanes
- Tornadoes
- Chemical Spills
- Natural Gas Leak
- Explosions
- Workplace Violence in including Hostile Intruders

PLANNING AND PREPARATION

The best way to prepare to respond to an emergency is before it happens. Few people can think clearly and logically in a crises so it is important to do so in advance.

All employees will be provided a copy of this Emergency Action Plan at the time of their initial hire orientation. They will be briefed on the contents of this plan by the Director of Security.

All employees onboard at the time this plan is enacted will receive a copy and will be briefed on it yearly at staff meetings and/or in service training.

The Director of Security will perform and document an annual fire drill with the Fairhave Fire Department.

Director of Security will ensure smoke and fire alarms will be tested on a monthly basis and fire extinguishers and the fire suppression system is tested/inspected on an annual basis.

The Director of Security will ensure that all cameras and security systems are inspected and tested monthly by a third-party vendor and copies of those inspection reports are maintained on the premises.,

CONDITIONS ORDINARILY REQUIRING EVACUATION

A wide variety of emergencies both man-made and natural, may require a workplace to be evacuated. Although highly unlikely, the most likely emergency in our Fairhaven facility is fire as no hazardous materials are kept or used in that facility. Other examples are a natural gas leak, workplace violence or violent intruder having gained entrance to the facility. Upon sounding of the facility fire alarm, all employees and visitors are required to evacuate the building immediately using the appropriate facility's designated evacuation routes. An order by a public safety agency to evacuate the building shall be immediately complied with in all situations.

CONDITIONS THAT MAY NOT REQUIRE EVACUATION

There are some emergencies in which it is advisable to shelter in place or seek shelter in another designated area of the facility. Examples include Tornadoes, toxic chemical spill on a nearby roadway or violent or suspicious person(s) outside or at the entrance to the facility.

EVACUATION OR OTHER ORDER AND NOTIFICATION OF PERSONNEL

The sounding of the fire alarm automatically means the premises is to be evacuated in accordance with the procedures delineated later in this document. In other emergencies the decision to evacuate or shelter in place shall be made by the President, CEO, Director of Security or Facility Manager. In their absence a manager on duty may make that decision in accordance with the guidance in this document. This should not be construed to prohibit personnel from immediately evacuating the building when faced with an emergent situation involving a danger of life or serious injury.

In the event the fire alarm is not activated, employees will be communicated by two way radio and facility paging system. All Department Emergency Wardens (DEWs) are responsible for ensuring all present members of their respective departments are aware of the situation.

FACILITY EMERGENCY WARDEN AND DEPARTMENTAL EMERGENCY WARDENS

There shall be designated one Facility Emergency Warden (FEW) with an alternate and at least two (2) Departmental Emergency Wardens (DEW) with alternates.

The FEW is responsible for ensuring orders to evacuate or shelter in place are communicated to all personnel through fire alarm (if appropriate), the paging system and two way radio. In the event of an evacuation he/she shall take command of personnel in the Assembly area ensuring no one leaves the area until properly accounted for, receive an accounting of personnel from the DEWs and report the findings to arriving public safety personnel. Unless relieved by the Baskin President or CEO, he/she shall be the point of contact for arriving public safety personnel and will decide, after consultation with public safety, if and when personnel can stand down from the evacuation or shelter in place order.

DEW's are responsible for ensuring any orders to evacuate or shelter in place are communicated to all personnel, including visitors) in their department areas. In the event an evacuation is

ordered they shall ensure all of their personnel leave the building, accounting for personnel in the Assembly area and reporting to the FEW.

PRIORITY

When an emergency occurs, the first priority is always life safety. Employees are never to endanger their lives to put out a fire or save equipment or product. All employees including security agents, the FEW and DEW's have the responsibility to assist any disabled person encountered in evacuating the building. Employees are not to physically struggle with an intruder. Wait for response from law enforcement. However, nothing herein precludes an employee from defending themselves from attack where there is no reasonable means of retreat.

FACILITY EVACUATION

EVACUATION ROUTES

Maps showing primary and secondary evacuation routes delineating the quickest routes to evacuate from work areas have been posted throughout the facility. Primary routes should be utilized in the event of an evacuation unless fire or other emergency makes use of the primary route dangerous, at which time secondary routes should be used. All employees must make themselves aware of the evacuation routes from their work area(s).

PROCEDURE

Upon sounding of the facility fire alarm, all employees, patients, customers and visitors are required to evacuate the building immediately using the appropriate, designated facility evacuation routes. Employees are to assist any disabled or injured person to safely evacuate. If safe to do so, employees shall close all doors and shut off unnecessary equipment.

Any customers, patients and visitors or contractors on the premises must be directed to the designated exit by employees. All persons should walk at a quick pace to the appropriate exit but not run. Departmental Emergency Wardens (DEW) are to ensure all persons in their department areas are evacuating as safety allows. All evacuees shall proceed directly to the location of the area on the north corner of the building designated by signage as the Assembly Area.

All employees are to report to their DEW at the assembly area. DEW's shall compare the identities of those reporting to him/her to those he/she knew were on duty and in the facility at the time the alarm sounded. The on duty security agents are responsible to ensure anyone signed in as a visitor is in the assembly area.

DEW's will expeditiously report to the Facility Emergency Warden (FEW) that all his/her employees are accounted for or, if not, the name and last known location of any missing employee. The FEW will report that information to the responding Public Safety agencies. The FEW will make the decision on whether to and when to allow employees back into the building after consultation with the Public Safety Incident Commander.

SECURITY AGENTS

The on-duty security agents in the security posts will remain in the posts viewing cameras, but only if safety allows, monitoring all areas on camera to ensure they have been evacuated. Once it is ascertained the facility is evacuated, the security agents may then exit the building

SPECIFIC EMERGENCIES

FIRE

In the event of a fire, the agent discovering the fire shall immediately activate an internal fire pull station alarm, notify a DEW if safety allows and evacuate in accordance with the evacuation policy delineated above. Employees are authorized to use fire extinguishers if it appears a small fire can be extinguished easily. An employee will NEVER be criticized for not attempting to use a fire extinguisher or other fire suppression tactic.

NATURAL GAS LEAK

Natural gas leaks can be detected by the distinctive rotten egg smell. Larger leaks can also present a “whooshing” sound. An agent discovering a minor natural gas leak shall immediately notify the security post and DEW. The DEW will either pull the fire alarm or, in the alternative, evacuate all personnel from that department and then notify the FEW or manager authorized to direct a general evacuation of the building who will make the decision. Anyone discovering anything but a minor leak will immediately pull a fire alarm and the building will be evacuated. The security agent on duty shall ascertain the location of the leak and notify Eversource. The DEW shall, if safety allows, open any doors near the leak to attempt to mitigate prevent concentrations of flammable gas from forming.

TORNADO OR SEVERE STORM WARNINGS

All personnel shall seek shelter in the Inventory/Vault Room in the event a tornado or severe storm warning is issued. It is important to not seek shelter in any room with a window or door to the outside. DEWs shall account for all persons in their work area and report to the FEW. The existence of a Warning will be communicated by the security agent on duty by two way radio and a telephone page. All persons will be strongly advised not to leave the building but not be physically restrained if insisting to do so. The on duty security agents will remain in the secure security post monitoring the Emergency Alert System and other communication channels to determine when the National Weather Service has issued an “all clear” and shelter in place can be lifted.

In the event a Hurricane Warning is issued, the President and/or CEO will decide if and when the Facility will be shut down.

HOSTILE PERSON (ARMED OR UNARMED) SEEKING TO ENTER THE BUILDING

In the event a hostile person, whether conspicuously armed or not, demands to enter the building or attempts to forcibly break into the building, an on duty security agent shall immediately press the panic button in the post. He/she shall then dial 911 and inform the police dispatcher of the situation and remain on the line. The security agent while remaining on the line will inform staff of the situation by radio and page and tell them to remain in place and to make sure all doors are secure. The security agent will maintain visual contact with the hostile person through the Avigilon cameras and inform responding police units through their dispatcher of the evolving situation including location of the hostile person. In no event will the security agent release any secure door to allow anyone to leave the building until police arrive and the situation has been contained.

HOSTILE PERSON (ARMED OR UNARMED) IN THE BUILDING

It is possible but highly unlikely that a person inside the building becomes hostile and violent or, even less likely given our access controls, that such a person may be able to forcibly gain access to the building. But should that occur, the security agent observing this person shall immediately press the panic button in the security post. He/she shall then dial 911 and inform the police dispatcher of the situation including location of the intruder and remain on the line. The security agent while remaining on the line will inform staff of the situation and tell them to seek shelter in a secure room and to make sure all doors are secure. The security agent will maintain visual contact with the hostile person through the Avigilon cameras and inform responding police units through their dispatcher of the evolving situation including location of the hostile person.

Personnel sheltering in a secure room are to shut all lights, remain quiet and turn off the volume on any cell phones

The taking of a hostage inside the building does not change the above procedure except that the police must be informed of that fact including location and name and description of the of the person taken hostage.

All personnel will continue to shelter in place until released by the police. Personnel encountering police should keep hands elevated and palms visible and not have anything in their hands that could be mistaken for a weapon such as a cell phone.

TOXIC CHEMICAL SPILL ON ADJACENT PROPERTY OR ROADWAY

All personnel will remain in the facility until guidance is received from the public safety incident commander. EMS will be called if anyone feels ill effects of fumes and all employees will be ordered directed out of the area where the person was sickened and directed to the area of the building furthest away from the location of the spill.

Incident Reporting: 935 CMR 502.110 (7)

- Reportable Incidents: BASK will immediately notify the Fairhaven Police Department and the CCC within twenty-four (24) hours after discovering the following:
 - Discrepancies identified during inventory, diversion, theft, loss, and any criminal action involving BASK or an BASK agent;
 - Any suspicious act involving the sale, cultivation, distribution, processing, or production of marijuana by any person;
 - Unauthorized destruction of marijuana;
 - Any loss or unauthorized alteration of records related to inventor
 - An alarm activation or other event that requires a response by public safety personnel
 - Failure of any security system due to loss of electrical power or mechanical malfunction that is expected to last longer than eight hours; and
 - Any other breach that jeopardizes inventory.
- Documenting and Reporting: Within ten (10) calendar days, BASK will provide written notice to the CCC of any incident described above, by submitting an incident report, detailing the incident, the investigation, the findings, resolution (if any), confirmation that the Fairhaven Police Department was notified, and any other relevant information. Reports, and supporting documents, including photos and surveillance video related to a

reportable incident will be maintained by BASK for a minimum of two (2) years and made available to the CCC and to law enforcement authorities acting within their lawful jurisdiction upon request. All incident reports and supporting documents will be retained by the Director of Security in a locked file cabinet.

SECTION VII – PREVENTION OF DIVERSION

Bask diversion prevention measures include, but are not limited to, agent and visitor accountability and identifying, recording and reporting diversion, theft or loss. Cannabis is stored and tracked in a manner that prevents diversion, theft or loss.

Anti-Diversion measures include:

- BASK agents should be aware of and observe for any unusual behavior in patients, customers, caregivers, authorized visitors or other BASK agents that may indicate the potential exists for diversion.
- Strict adherence to certification amounts and time periods (per CCC guidelines above) as well as rigorous patient identification verification procedures through the MMJ Online System are strong safeguards against potential diversion.
- Dispensing Procedures -
 - Patient/Caregiver must present a valid CCC issued Patient/Caregiver Identification Card and additional form of identification containing a photograph and date of birth – acceptable forms of ID include a driver's license, government-issued ID card, military identification card, or a passport.
 - Patient verification utilizing the Massachusetts CCC MMJ Online System to verify the legal purchase and possession of marijuana for medical use and recording of the amount of marijuana purchased in order to ensure that quantity limit (see below) is observed.
 - Adult use customers must provide an ID photograph and date of birth showing they are at least 21 years of age– acceptable forms of ID include a driver's license, government-issued ID card, military identification card, or a passport.
 -
- In the event dispensary agents observe suspicious behavior by a patient or customer while at the dispensary, the Dispensary Manager and/or the Director of Security should be notified prior to the completion of a sales transaction - examples of such behavior include:
 - Appears to be under the influence of drugs or alcohol; [SEP]
 - Patient requests additional medicine because he/she lost or forgot to pack medication; and [SEP]
 - Threats or by attempts to elicit guilt or sympathy. [SEP]

Dispensary agents may refuse to dispense to a registered patient or caregiver if there is concern the patient or public would be placed at risk – If a medical patient, the certifying physician will be notified within 24 hours.

- Providing samples or giving away cannabis is strictly prohibited
- Employees are aware of crime prevention techniques
- Any Bask agent who is suspected of diverting cannabis is immediately dismissed and is reported to the Fairhaven Police Department. 935 CMR 500.105(1) (m)
- A Bask agent who is convicted, enters a plea of no contest or admits to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation in any other jurisdiction shall be immediately dismissed. 935 CMR 500.105 (1) (m)
- A Bask agent who engages in unsafe practices with regard to our operations will be immediately dismissed and reported to the Commission 935 CMR 500.105(1) (m)
- All Bask agents are made aware of the consequences of diversion and their responsibility to report suspicious behavior at their first day mandatory training
- Bask will only engage in reasonable marketing, advertising and branding practices that do not promote diversion of cannabis and comply with all marketing and advertising requirements under 935 CMR 502 105(a) & (b)
- Warning statements required by Commission regulations are affixed to all applicable products and Bask labels comply with all other labeling of cannabis and cannabis requirements
- Tamper or child resistant packaging is used for all applicable cannabis products and our products comply with all other packaging of cannabis and cannabis products under 935 CMR 502.
- Bask will maintain real time inventory tracking and tagging all cannabis seeds, clones, plants and products using the seed to sale methodology in a manner approved by the Commission.
- Records are kept for inventory, seed to sale tracking for all cannabis products, personnel (including documentation of required training) and waste disposal and Bask will comply with all other record keeping requirements under 935 CMR 502.
- Cannabis or cannabis products that are outdated, damaged, deteriorated, mislabeled or contaminated or whose containers or packaging has been opened or breached are stored in a separate area until such products are destroyed. Bask will comply with all other storage requirements under 935 CMR 502.105 (12)
- Two or more Bask agents witness and document how cannabis waste is disposed and Bask will comply with all other waste disposal requirements under 935 CMR 502.105 (12)
- All security requirements under 935 CMR 502.110 are followed including
 - Implementing sufficient safety measures to deter and prevent unauthorized entrance into areas containing cannabis and theft of cannabis
 - Procedures to prevent loitering, including a security agent posted outside the building during business hours, and to ensure that only individuals engaged in activity expressly or by necessary implication permitted by Commission regulations and it's enabling statute are allowed to remain on the premises.
 - Storing all finished cannabis products in a secure locked safe or vault monitored and recorded 24/7 by security cameras with access granted to only the minimum necessary persons needed to conduct business

- Restricting access to all limited access areas of the facility to Bask agents and authorized, escorted visitors agents of the Commonwealth, state and local law enforcement and emergency personnel acting in the course of their duties
 - Implementing an adequate security system to prevent and detect diversion, theft or loss of cannabis. Bask will notify the Commission and local law enforcement within 24 hours of any diversion, theft or loss of any cannabis product.
 - Obtain at Bask expense a security system audit by a vendor approved by the Commission and all other security and alarm requirements under Commission regulations
- Agents and visitors are not allowed to bring any bags, backpacks, purses or other items onto Bask premises that could be used for diversion.

SECTION VIII — CASH MANAGEMENT

Agents that handle and store cash are responsible for the funds while under their control. BASK will limit the amount of cash in cash drawers by limiting the amount of cash in each cash drawer at the beginning of a Sales Agent’s shift and by conducting frequent cash sweeps throughout the day. These measures are designed to reduce the risk of discrepancies and allow for frequenting counting to occur.

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

All cash will be secured in a safe and stored in the vault room, separate from cannabis or cannabis products. The safe will have a 4-digit combination lock with a slot in which to drop in the cash. At no time will the door of the cash storage vault be left open while the room is unattended. If the room is in use, then the outer door will be kept closed. The safe will only be open during the time required to remove/replace cash. The only agents authorized to access the safe are the Chief Executive Officer, Chief Financial Officer, Dispensary Manager and agents designated by the Chief Executive Officer

A record of the names of persons having access to the vault room will be maintained by Director of Security. Access to vault room is highly restricted and is safeguarded via the use of card key access as well as individual PIN codes. Cash will be counted at minimum three (4) times each day:

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

In the event of a discrepancy, the Retail Manager will be notified. If the discrepancy cannot be expeditiously explained, the Chief Executive Officer or his designee will be notified, and an

immediate internal audit will be conducted to determine where and when the discrepancy occurred. If it is determined that there is an error or inaccuracy in the reporting, then the cause will be investigated and corrective action measures will immediately be put into place to avoid such error or inaccuracy in the future.

Cash will be transported from BASK to the bank of deposit only by an entity or individuals authorized by the Chief Executive Officer. Pickups and deposits will occur frequently, or as requested by the Chief Executive Officer or Chief Financial Officer.

SECTION X — AGENT BACKGROUND CHECKS & TRAINING

Agent Background Checks

- In compliance with 935 CMR 502.106, all agents hired to work for BASK will undergo a detailed background investigation prior to being granted access to BASK or beginning work duties in compliance with 935 CMR 502. 105.
- Bask shall apply for CMO agent registration for all board members, directors, employees, executives, managers, and volunteers who are associated with that CMO. All such individuals must: (a) Be 21 years of age or older; and (b) Have not been convicted of a felony drug offense, a non-felony drug distribution offense or non-felony weapons violation involving narcotics in the Commonwealth, or a like violation of the laws of another state, the United States or a military, territorial, or Indian tribal authority.
- Bask shall provide the required information in the application for registration of an CMO agent, in a form and manner determined by the Commission, shall include: (a) The full name, date of birth, and address of the individual; (b) Written acknowledgment by the individual of the limitations on his or her authorization to cultivate, harvest, prepare, package, possess, transport, and dispense marijuana for medical purposes in the Commonwealth; (c) A copy of the CMO agent's driver's license, government-issued identification card, or other verifiable identity document acceptable to the Commission; (d) An attestation that the individual shall not engage in the diversion of cannabis; (e) A nonrefundable application fee; and (f) Any other information required by the Commission.
- A Bask executive registered with the Department of Criminal Justice Information Systems (DCJIS) pursuant to 935 CMR 502.028 will submit to the Commission a Criminal Offender Record Information (CORI) report and any other background check information required by the Commission for each individual for whom the Bask seeks a CMO agent registration, obtained within 30 calendar days prior to submission.
- Bask will notify the Commission no more than one business day after an CMO agent ceases to be associated with the CMO.
- A registration card will remain valid until its one year anniversary date or until a new registration card is issued by the Commission, whichever occurs first. On the issuance of a new registration card, the holder of the registration card shall destroy any previously issued registration card(s) in a responsible manner that would prevent it from being used as a registration or identification card.

- As a condition of their continued employment, agents are required to renew their agent registration cards and submit to other background screening as may be required by BASK or the CCC.

Agent Training (935 CMR 502.105(2))

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

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

SECTION XI — REPORTS & RECORDKEEPING

Security Recordkeeping

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

Agent Personnel Records

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

- Results of initial background investigation, including CORI reports. These will be kept in a locked cabinet, separate from the agent’s personnel file where they can be made available for inspection by the CCC ;
- Documentation that references were checked prior to agent being hired;
- Offer letter from BASK to the new agent, including job title and supervision;
- Materials submitted to the CCC for agent registration purposes. These documents will be maintained separately in locked cabinet;
- Documentation of initial 90-day review and annual performance reviews;
- Dates of completion of all required initial and recurrent training; including a signed statement by the agent attending the training with the date/time/place the training was received, topics discussed, and the name/title of the presenter(s). Documentation may also be kept in separate training logs and notebooks.

- Documentation of all security related events (including violations) and the results of any investigations and description of remedial actions, restrictions, or additional training required as a result of an incident.

SECTION XII — EMERGENCY CONTACT LIST

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

Chief Executive Officer: Chapman Dickerson	508-758-2536
President: Tim Keogh	508-971-9768
Compliance Counsel: Valerio Romano, Esq.	617-866-7135
Director of Security: Gary Souza	508-431-3966

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

MA Cannabis Control Commission	617-701-8400
Massachusetts State Police:	508-820-2300 (Headquarters)
	508-923-4014 (Local Barracks)
Eversource	617-424-2000
Fairhaven Fire	508-994-1428 (Non-Emergency)
Fairhaven Dept. of Health	508-979-4022
Fairhaven Police	508-997-7421(Non-Emergency)
Fairhaven City Hall	508-979-4023

SECTION XIII — JOB DESCRIPTIONS

Director of Security

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

- Provide general training to BASK agents during new hire orientation or re-current trainings throughout the year;
- Provide training specific for Security Agents prior to the Security Agent commencing job functions;
- Review and approve incident reports and other reports written by Security Agents prior to submitting to the executive management team – follow up with security agent if needed;
- Maintain lists of agents authorized to access designated areas of the BASK facility, including cash and product storage vaults, surveillance and network equipment room, and other highly sensitive areas of the BASK facility;

- Verify that all required background checks have been completed and documented by the Compliance Director prior to an agent performing job functions;
- Ensure Bask agents are granted appropriate level of access to the facility necessary to complete his/her job functions;
- Maintain all security related records, incident reports and other reports written by security agents;
- Work with vendors to ensure proper operation of Bask security systems – cameras, alarms, key card system;
- Implementing and supervising routine security checks on Bask property;
- Providing deliveries to or obtaining product from, other dispensaries;
- Implementing and maintaining home delivery service;
- Evaluate and determine the number of security agents assigned to each shift and proper shift change times;
- Take a leadership role in implementing emergency procedures, identifying security risks, and policies to prevent diversion; and
- Maintain contact with the Fairhaven Police and Fire Department as necessary.

Reports to CEO

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

- Investigate, communicate and provide leadership in the event of an emergency such as an intrusion, fire, or other threat which jeopardizes registered patients, caregivers, authorized visitors, and BASK agents;
- Respond and investigate security situations and alarm calls; clearly document the incident and details surrounding the incident in a written report for the Director of Security;
- Oversee the entrance to the Dispensary and verifying credentials of each person seeking access to the BASK facility;
- Answer routine inquiries;
- Log entries, and maintain visitor log;
- Escort authorized visitors in restricted access areas and/or ensure that a Bask agent is with an authorized visitor in restricted area at all times by monitoring compliance on camera; and

- Monitor the video surveillance cameras in limited access areas, dispensary, waiting area, and the exterior of building to ensure safety and compliance with CCC regulations and Bask policies and procedures.
- May include driving the Bask van for the purpose of acquiring or delivering product to other dispensaries or home deliveries.
- Knowledge of and compliance with all security protocols, policy, procedures and regulations.

Reports to Director of Security

Security Agent – Delivery

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

- Investigate, communicate and provide leadership in the event of an emergency such as an intrusion, fire, or other threat which jeopardizes registered patients, caregivers, authorized visitors, and BASK agents;
- Respond and investigate security situations and alarm calls; clearly document the incident and details surrounding the incident in a written report for the Director of Security;
- Oversee the entrance to the Dispensary and verifying credentials of each person seeking access to the BASK facility;
- Answer routine inquiries;
- Logging entries, and maintaining visitor log;
- Escorting authorized visitors in restricted access areas; and
- Executing deliveries to other dispensaries and providing home deliveries,
- Performing security checks at designated intervals.
- Comply with Bask policies and procedures and state law and regulation
- Participate in trainings as needed

Reports to Director of Security

Security Agent - Reception

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

- Investigate, communicate and provide leadership in the event of an emergency such as an intrusion, fire, or other threat which jeopardizes registered patients, caregivers, authorized visitors, and BASK agents;
- Respond and investigate security situations and alarm calls; clearly document the incident and details surrounding the incident in a written report for the Director of Security;
- Oversee the entrance to the Dispensary and verify credentials of each person seeking access to the BASK facility;
- Monitor delivery vehicle while it is out on deliveries;
- Answer routine inquiries;
- Log entries and maintain visitor log;
- Ensure that all authorized visitors are at least 21 years old by checking proper government issued ID;
- Ensure that authorized visitors are escorted by an agent at all times in restricted access areas; and
- Monitor cameras to ensure compliance both within and outside the building
- Perform security checks at designated intervals.
- Comply with Bask policies and procedures and state law and regulation
- Participate in trainings as needed

Reports to Director of Security