

Applicant must submit a detailed security plan in accordance with New Jersey regulations. Needs to describe plans for storage of products, physical security, video surveillance, security personnel and visitor management. Must include the following:

- *Plan for the storage of cannabis and cannabis items (4.0 – SECURE CANNABIS STORAGE)*
- *Delivery and shipping procedures (14.0 – DELIVERY AND SHIPPING PROCEDURES)*
- *Onsite security guards and their responsibilities (2.0 – SECURITY PERSONNEL)*
- *General description of security cameras and alarms (3.0 – SECURITY AND SURVEILLANCE FEATURES)*
- *Diversion Prevention Plan (5.0 – DIVERSION PREVENTION)*
- *Parking arrangements for employees and customers/visitors (11.0 – PARKING)*
- *Procedures and training for all fire and medical emergencies and hazardous situations (6.0 – EMERGENCY MANAGEMENT)*
- *Sample of signage that it is illegal to sell to anyone 21 years and under that store will check ID upon purchase (12.0 – SIGNAGE)*
- *Procedure for handling a customer exhibiting alcohol and/or substance abuse (13.0 – PROCEDURES FOR CUSTOMERS EXHIBITING SIGNS OF ABUSE)*
- *Procedures for screening, monitoring, and performing criminal background history record checks of employees (7.0 – SCREENING AND MONITORING)*
- *Workplace Safety Plan (9.0 – WORKPLACE SAFETY AND OSHA; 10.0 – HISTORY OF WORKERS' COMP CLAIMS AND SAFETY ASSESSMENTS)*

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1.0 – SAFETY AND SECURITY OVERVIEW

Haddon Property Holdings is committed to maintaining compliance with N.J.A.C. 17:30-9.10. We acknowledge that a sound, best-in-class security program requires the vetting, hiring, training, and retention of qualified personnel; expert use and implementation of equipment, technology, and other safety- and security-related infrastructure; and strict adherence to sound plans, policies, and procedures designed to mitigate, reduce, and respond to threats, vulnerabilities, and risks wherever possible. Our security plan draws upon decades of real-world experience and best practices in enterprise security risk management, evolving and adapting according to the ever-changing threat landscape associated with the cannabis market.

2.0 – SECURITY PERSONNEL

The use of experienced and qualified security personnel, including contractors, is a vital component of our Safety and Security Plan. We believe that security is a function of all positions, not just those solely dedicated to safety and security. We are committed to hiring a skilled workforce of qualified individuals who are screened, subjected to background checks pursuant to N.J.A.C. 17:30-7.12, and successfully test out of safety- and security-related training, particularly training pertaining to procedures and equipment in N.J.A.C. 17:30-9.10, to ensure a complete understanding of each individual’s roles, responsibilities, and expectations according to function.

To that end, we are in the process of identifying a qualified security director capable of overseeing the safety and security of the facility, liaising with law enforcement and other proximal assets, ensuring IT and cyber security, and coordinating with a reliable and qualified security staffing company with proven past performance licensed in the state of New Jersey capable of providing on-site security personnel, or Facility Protection Officers (FPOs). During

all operational hours when any staff members are present in the facility, a minimum of one FPO will be present on-site to ensure facility safety and security, deter criminal activity, monitor the facility's video surveillance system, proactively identify gaps, respond to emergencies, and report incidents that may occur. FPOs will be subjected to the same screening and testing requirements as our employed personnel. All FPOs will be experienced and qualified with all safety- and security-related technology, equipment, infrastructure, plans, policies, and procedures.

3.0 – SECURITY AND SURVEILLANCE FEATURES

In accordance with N.J.A.C. 17:30-9.10(b)(9), we will equip our facility's interior and exterior premises with electronic monitoring, video cameras, and panic buttons as well as controlled access and alarm infrastructure. In the following subsections, we provide high-level explanations and features of our controlled access and visitor management systems, video surveillance systems, and intrusion detection and alarm systems, all of which will be installed, trained, and supported by a licensed and vetted security systems integrator. Floor plans demonstrating proposed locations of surveillance cameras and other security features can be found at the bottom of this document.

3.1 – Controlled Access and Visitor Management Systems

Our controlled access and visitor management systems provide the means to ensure a secure and compartmentalized facility with role-, time-, and staff-specific access to each area according to function. These systems and corresponding procedures, working with other security infrastructure and SOPs, guard against unauthorized access to the premises and the business's electronic systems while protecting against theft, diversion of cannabis, and electronic records tampering per N.J.A.C. 17:30-9.10(a). In addition to equipping all critical access entryways (exterior doors, secured storage, etc.) with appropriately-rated mechanical locks, multi-factor authentication access controls backed up with fail-proof batteries ensure all areas are appropriately secured with access limited to specifically authorized staff members at defined times.

The first layer of our Controlled Access System's authentication is made possible through the use of MiFare DESFire credentialing on all access points throughout the facility. This technology features industry-leading encryption technology, a digital key handshake, and unique RFID signatures assigned to each user, resulting in fast, efficient, and hack-proof access controls. As part of our facility uniform standard, each credential is worn on a lanyard around the employee's neck, drastically reducing the possibility of a key being left in a lock or otherwise accessed by persons other than the assignee. The second layer of our authenticated access requirement includes a unique five-digit Personal Identification Number (PIN) access assigned to each authorized user. By utilizing multi-factored access in certain areas, we can avoid instances where a single point of failure, such as a misplaced credential or compromised PIN, would allow access to an individual not authorized to enter a certain area.

Regarding visitor management, authorized visitors will be assigned a visitor credentialing badge that is a different color from employee staff badges, worn in accordance with facility uniform standards. An authorized facility staff member must accompany all visitors, and the

monitoring of each visitor is tracked via RFID, access logs, and the video surveillance system. Additional noteworthy features of our Controlled Access and Visitor Management Systems provide the means to close vulnerabilities and prevent unauthorized access: Daily access control point inspections, monthly third-party functions checks and penetration tests, and annual Threat Risk and Vulnerability Assessments (TRVAs) will ensure regular functions checks, gap analyses, and proper maintenance is conducted and logged. Any denial of entry is flagged by the system, and distress PINs are assigned that grant access while simultaneously alerting law enforcement. Credential overflow is addressed via a two-part redundant system that ensures revocation of access upon termination or role-specific change. In summary, these elements of our multi-authentication access ensure that only appropriately-credentialed individuals have access to predetermined rooms at specified times, all while being continually monitored and tracked by the controlled access and visitor management systems, effectively deterring and preventing unauthorized entrance into areas containing cannabis and the theft of cannabis per N.J.A.C. 17:30-9.10(b)(2).

3.2 – Video Surveillance System

In addition to the physical, mechanical, and technological controlled access and visitor management systems described above that provide the means to allow compartmentalized access to credentialed individuals while maintaining an access log with the ability to flag anomalies and alert authorities, the facility is equipped with interior and exterior electronic monitoring, video cameras, and panic buttons pursuant to N.J.A.C. 17:30-9.10(b)(9). This integrated video surveillance system will be operated to monitor all critical control activities of the cannabis business. This system, which shall be approved by the Commission before license issuance and in working order and operating at all times, shall always be available for remote viewing by the Commission per N.J.A.C. 17:30-9.10(b)(9)(i). To ensure seamless operation, daily system inspections, including storage capabilities, will be conducted by qualified facility staff, and monthly maintenance and function checks will be performed by a licensed, third-party integrator. In the event of a power outage or disruption, backup power will be supplied to critical systems to maintain operations. The original digital pictures produced by the system will be stored and backed up with a 30-day minimum archive per N.J.A.C. 17:30-9.10(b)(9)(ii). Also, while the monitoring of the facility's security alarm and video surveillance systems will be conducted on-site during operating hours, continuous, 24/7 monitoring will be conducted remotely by a licensed and qualified third-party pursuant to N.J.A.C. 17:30-9.10(c).

Though the cameras selected will function in low-light conditions, adequate and strategically-placed lighting will ensure optimum surveillance quality while providing illumination to all areas in accordance with OSHA guidelines. The lighting infrastructure will support the video surveillance system and illuminate all entrances and exits per N.J.A.C. 17:30-9.10(b)(10)(ii). The outside areas of the premises and the perimeter will be well-lit per N.J.A.C. 17:30-9.10(b)(10). The exterior lighting will be sufficient to deter nuisance and criminal activity and facilitate surveillance through the use of strategic placement and glare projection tactics where appropriate while also making a reasonable effort not to disturb surrounding businesses or neighbors in accordance with N.J.A.C. 17:30-9.10(b)(10)(i). In concert, the features and capabilities of the facility's lighting and Video Surveillance Systems will ensure uninterrupted, unobstructed, and multi-angle visual monitoring of the entire facility, particularly the areas containing cannabis and cannabis product.

3.3 – Alarm Systems

Our fully integrated intrusion detection and alarm system features a variety of manual and automated triggers that provide the means to alert responders and authorities as appropriate, providing a layer of suitable protection against theft and diversion. The strategic and discrete placement of panic buttons and using a distress PIN can manually trigger an alert to security staff, off-site monitoring, law enforcement, the Public Safety Answering Point (PSAP), and any other predetermined stakeholders. In contrast, instances of power or system-wide interruptions, failure, forced access, credential overflow violations, and unauthorized access attempts will automatically trigger the alarm system per N.J.A.C. 17:30-9.10(b)(1)(i). Any such system or power disruption or failure is backed up with localized battery support. It will, as stated above, immediately alert the State or local police agencies per N.J.A.C. 17:30-9.10(b)(1)(ii). If, in the event of a failure of the security alarm system due to a loss of electrical support or mechanical malfunction that is expected to last longer than eight hours, we will notify the Commission pursuant to N.J.A.C. 17:30-9.11 and either provide alternative security measures approved by the Commission or close the physical address impacted by the failure or malfunction until the security alarm system is restored to full operation in accordance with N.J.A.C. 17:30-9.10(b)(6)(i) and (ii).

In an effort to prevent any such disruptions to the alarm systems, daily testing and maintenance will be conducted internally, and monthly third-party testing and maintenance will be performed in accordance with N.J.A.C. 17:30-9.10(b)(4). This testing and maintenance standard ensures that no more than 30 days will span between inspections, and all necessary repairs will be promptly implemented to ensure the proper operation of the alarm system per N.J.A.C. 17:30-9.10(b)(5).

4.0 – SECURE CANNABIS STORAGE

To ensure the security of cannabis and cannabis products, we will employ adequate security measures and infrastructure defined throughout this volume in accordance with N.J.A.C. 17:30-9.10 relative to the value and risk as appropriate in accordance with N.J.A.C. 17:30-9.12. Our team will determine what constitutes appropriate measures based on globally-recognized security standards and thresholds, the quantity of cannabis being stored in an area, the business's inventory system used for tracking cannabis, the number of individuals who have access to the product, geographic and other proximal considerations, the scope and sustainability of the security alarm system, and the findings of root cause analyses of any breaches of security and/or inventory discrepancies for cannabis items at the location. All cannabis or cannabis products will only be stored in fully-enclosed and structurally secure controlled access areas that are continually monitored by our video surveillance systems and equipped with the alarm system. These designated rooms may be accessed only by credentialed, role- and time-specific staff members employing a minimum of two-factor authentication. Any cannabis-related activity will be conducted in full view of the camera infrastructure and in accordance with the two-person rule. Similarly, cannabis that has been transferred, quarantined, destroyed, disposed of, packaged, and/or stored will always be weighed, tagged, and tracked accordingly to ensure full accountability and transparency. The vault, our primary storage area for cannabis and cannabis products, features multi-factor authentication, six hardened sides, and contact switches, providing early penetration attempt warning capabilities and a significant time investment to

breach in excess of emergency response times. Further, all cannabis and cannabis products will be secured in rooms that feature climate control systems capable of maintaining the proper temperature and humidity levels required to uphold a high-quality standard. We will maintain the capability of ensuring industry-leading security and maintaining appropriate environmental controls of all stored cannabis products.

5.0 – DIVERSION PREVENTION

Our diversion prevention capabilities consist of every concentric-layered and interconnected facet of our Safety and Security Plan, inventory controls, secure storage infrastructure, and SOPs working in concert, intentionally designed to guard against unauthorized access to the premises or the business's electronic systems, theft, and diversion of cannabis per N.J.A.C. 17:30-9.10(a). Diversion prevention begins at the design phase; balancing workflow efficiencies with purposefully redundant or compartmentalized functions is a fundamental consideration in any regulated business. The facility design process has been conducted with Crime Prevention Through Environmental Design (CPTED) principles considered in parallel with workflow optimization to achieve an ideal balance between preventing diversion and theft while maintaining an efficient operational workflow. Our trained personnel, facility design, implementation of security and inventory tracking technology, and strict adherence to policies and procedures collectively comprise the security measures that deter and prevent the unauthorized entrance into areas containing cannabis and the theft of cannabis per N.J.A.C. 17:30-9.10(b)(2) and work in concert to protect the premises, consumers, and cannabis business personnel per N.J.A.C. 17:30-9.10(b)(3). With our controlled access system and policies, entry to the premises is diligently controlled and minimized per N.J.A.C. 17:30-9.10(b)(7), and access into areas where cannabis is held will only be granted to the role- and time-specific authorized personnel in accordance with N.J.A.C. 17:30-9.10(b)(8). Our two-person rule ensures that all cannabis-related activities are conducted in designated areas and in clear view of the video surveillance system with no fewer than two qualified and credentialed facility staff present. Any weighing or measuring of cannabis will be done on a National Type Evaluation Program-approved scale licensed under the Weights and Measures Act and recalibrated regularly. All inventory data will be immediately logged into the inventory management system and verified by both staff members to ensure accuracy. Purposefully redundant and thorough tracking capabilities, secure storage practices, real-time monitoring, uniform standards, and a culture of accountability all provide the means to prevent theft or diversion. Our systems and policies collectively provide the means to mitigate errors, immediately identify inventory discrepancies, and in the unlikely event of theft or diversion, halt operations to investigate a situation and report to law enforcement by telephone and the Commission no later than three hours after the discovery of the event per N.J.A.C. 17:30-9.11(a).

6.0 – EMERGENCY MANAGEMENT

Our emergency management plan is designed to ensure all staff members are trained to recognize, respond to, and recover from emergencies within or near the facility, including fires, medical emergencies, and hazardous situations. While the security staff will receive additional response training, they will be required to conduct scenario-based Initial Responder Training exercises with all other facility staff to ensure a one-team mentality and ensure a demonstration of competence and understanding under a variety of emergent situations. All facility staff will be

trained to communicate potential, likely, and imminent threats, and a strong emphasis will be placed on situational awareness and human-threat recognition to proactively detect behavior that may require the employment of response procedures. As part of each staff's Initial Responder Training, all staff will be fully trained in FEMA IS-906: Workplace Security Awareness, FEMA IS-907: Active Shooter: What Can You Do, FEMA IS-200: Basic Incident Command System for Initial Response, and robbery and workplace violence-specific training pursuant to N.J.A.C. 17:30-9.8(b)(5). Further, to ensure safety, security, and collaboration with the community, law enforcement, and surrounding neighbors within 100 feet of the cannabis business will be provided with the name and phone number of a staff member to notify during and after operating hours in the event of a problem with the establishment per N.J.A.C. 17:30-9.10(b)(11).

6.1 – Fire Emergency Procedures

To enable our staff to effectively recognize, respond to, and recover from a fire, we will have clear, posted evacuation routes and designated meeting points memorialized in an Emergency Evacuation Plan and posted throughout the facility that all employees will be familiarized with through regular training. Fire drills will be conducted regularly to ensure employees know how to evacuate quickly and safely, and all employees will be trained in the proper use of fire extinguishers and the locations of all fire suppression and alarm equipment. As part of regular maintenance checks, staff will ensure all smoke alarms, fire detectors, and sprinkler systems are functional.

6.2 – Medical Emergency Procedures

To enable our staff to effectively recognize, respond to, and recover from a medical emergency, employees will be trained in basic first aid and CPR, and at least one staff member with advanced first-aid certification should be on duty at any given time. The facility will maintain well-stocked first aid kits in easily accessible areas, and employees will be trained on the location and proper use of all first aid inventory. Staff will also maintain up-to-date emergency contact information, including all proximal assets, which will be posted clearly in the workplace.

6.3 – Hazardous Situations

Employees will be trained as appropriate and applicable to their respective function in the proper handling, storage, and disposal of any hazardous materials in line with OSHA guidelines. A spill kit will be available for chemical spills, and employees will be trained on proper spill containment protocols and clean-up procedures, including the proper use of personal protective equipment (PPE). As part of our plan to maintain a safe and healthy workplace, we will ensure adequate ventilation as appropriate to avoid inhalation of hazardous fumes.

6.4 – Hostile Situations

In an emergent, hostile situation, strategically placed silent alarm triggers and distress PINs can be discreetly activated in order to immediately alert law enforcement of an incident while maintaining an otherwise normal posture in the facility. All staff will be trained to respond to threats to remove themselves from the threat area to a place of greater relative safety and

alerting authorities. Knowledge and proficiency in the use of all safety and security-related equipment and infrastructure, redundant communication methods, multiple evacuation routes, designated hardpoints, trauma kits, and emergency services contact and procedures will be trained and demonstrated by all staff as part of our emergency management plan. After any emergent event has been responded to and the threat is no longer present, staff members are trained on appropriate recovery procedures to ensure evidence is protected in accordance with Crime Scene Preservation Training protocols; proper documentation, internal and external investigations, and reporting procedures are conducted; and management coordinates an After-Action Review (AAR) within five days of the incident. Any changes deemed necessary in any aspect of the business resulting from the incident and findings of the AAR will be carefully considered with expert input from subject matter experts and the Commission and thoroughly tested prior to implementation. As always, our pursuit of continued excellence in safety and security is at the forefront of our business model.

7.0 – SCREENING AND MONITORING

We have a series of screening and monitoring procedures in place to ensure all staff members are fully compliant with state and local laws as well as company policies, procedures, and codes of conduct. A careful analysis of a candidate’s application, resume, and work history will be conducted with each applicant, and all staff members will be subjected to a criminal history background check in accordance with N.J.A.C. 17:30-7.12. All individuals on the premises will be closely monitored via the controlled access and visitor management systems, video surveillance systems, and intrusion detection and alarm systems, which collectively ensure role- and time-specific access throughout the facility while maintaining uninterrupted video footage of all activities. Pursuant to N.J.A.C. 17:30-9.10(c), the video surveillance system will be continuously monitored 24 hours per day, seven days per week. Due to the two-person rule, all individuals will conduct cannabis-related activities in the presence of at least one other facility staff member in addition to the video surveillance system. Further, uniform standards allow for easy identification of staff members according to function while mitigating opportunities for theft or diversion. All videos, access logs, and other monitoring data will be available to law enforcement and the Commission upon request. These redundant and concentrically layered policies, procedures, and supporting technologies provide the means to ensure thorough and uninterrupted screening and monitoring of all individuals present on facility grounds.

8.0 – CYBERSECURITY

Our cybersecurity capabilities will be made possible by the implementation of industry-leading network security infrastructure, best practices, and expert oversight from our Security Director. All aspects of our network, including our inventory management and tracking platform, will utilize the best security encryption available on the market through the Amazon Web Services hosting platform, featuring various compliance and certification programs, including SOC2, HIPAA, PCI, and FEDRAMP. Account security will require complex password length and character/symbol requirements, mandatory password changes every 90 days, multi-factor authentication, and automatic account disabling after three failed attempts. To ensure data security, all data-in-transit and data-at-rest are subjected to FIPS-compliant Row level AES-256 encryption by default, with additional encryption for backup files. All physical and virtual machines are deployed with anti-malware and anti-virus applications, automatically updated, and

will automatically scan, detect, and report potential environmental threats. In an effort to ensure adequate cybersecurity capabilities, the Security Director will be tasked with collaborating with qualified and licensed security integrators to conduct vulnerability assessments and regular testing of operating systems, applications, and network devices.

9.0 – WORKPLACE SAFETY AND OSHA

We are committed to workplace safety. Our team is familiar with and will implement federal Occupational Safety and Health Administration (OSHA) compliant workplace safety plans and assessments in accordance with N.J.A.C. 17:30-9.10, led by Human Resources and the Security Director with oversight from the entire executive team. As part of our business operations manual, we will develop, implement, and maintain safety procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies, and implement personal safety and crime prevention techniques per N.J.A.C. 17:30-9.6(a)(5). All staff will be required to participate in OSHA-compliant workplace safety training as part of our initial and ongoing training program and will demonstrate the ability to identify and communicate workplace safety hazards at all levels. The facility's controlled access, visitor management, and video surveillance systems work in concert with the alarm infrastructure, which can be manually or automatically activated to alert key stakeholders and police responders, and will provide suitable protection and response to safety and security-related incidents. All safety and security systems feature redundant backups to ensure continuity, triggering an immediate alert upon electrical support or interference loss. These workplace safety standards extend to our quality management and product/consumer safety throughout the entirety of operations. Our training requirements, expert leadership and oversight, policies and procedures, and supporting safety equipment and infrastructure provide the means to implement and maintain OSHA-compliant facility and workplace safety standards in accordance with state and federal law wherever applicable.

10.0 – HISTORY OF WORKERS' COMP CLAIMS AND SAFETY ASSESSMENTS

Haddon Property Holdings is a newly-formed entity created to pursue a Class 5 retail license in New Jersey's adult-use cannabis market. As such, the company has no workers' compensation claims. Brian Garmo, majority shareholder and in-house legal counsel, is a highly experienced attorney and entrepreneur with an impeccable professional history. With over 18 years of legal experience and awardee of several accomplishments, including being named a Rising Star by Super Lawyers, Top 40 Under 40 by National Trial Lawyers, Top One Percent by the National Association of Distinguished Counsel, and Full-Service Law Firm of the year by Corporate INTL, Garmo brings valuable knowledge and experience to the table.

With 17 years of experience in her family restaurant and bar, Kristine Koengetter's service as a manager has resulted in a deep understanding of ensuring compliance with many applicable regulatory thresholds and best practices, including worker's compensation, food safety, sanitation, and legal sale and inventory control of alcohol products. Further, her 20-year career in public education has provided decades of firsthand knowledge of the importance of safety assessments, policies, and procedures. As an educator, she is engaged in an ongoing effort to ensure a safe and secure learning environment for her students.

Phil Gothard is a seasoned business and security expert with more than 20 years of experience in leadership, project management, and operations. His background includes serving in the U.S. Army Special Operations (1/75 Ranger Regiment), working on the U.S. Department of State Ambassador's Protection Detail in Baghdad, Iraq, and consulting for multinational corporations across the globe conducting executive protection details and threat, vulnerability, risk assessments. Through these roles, he has gained extensive expertise in static and dynamic security, compliance, and best practices for business continuity.

Our safety assessment capabilities feature OSHA, FEMA, National Safety Council (NSC), and National Fire Protection Association (NFPA) compliance standards, in addition to state and industry-specific regulations as applicable. To meet our goals of ensuring a safe and secure workplace, our team will conduct daily operational surveys and facilitate third-party and internal Threat Risk Vulnerability Assessments (TRVAs) and policy & procedure audits on a scheduled basis. These efforts are intended to proactively identify, communicate, and address safety issues within or near the facility prior to the occurrence of an incident wherever possible. Our Security Director will conduct and oversee these security and safety assessments in concert with leadership. Through the application of relevant, expert experience, the employment of safety and security assessments, and the implementation of proactive measures, our team has an impressive track record of ensuring industry-leading workplace safety and compliance.

11.0 – PARKING ARRANGEMENTS

To provide adequate parking arrangements for employees and customers/visitors, we will maintain a minimum of 5.5 parking spaces per 1,000 square feet of gross building area plus one (1) parking space per employee in accordance with § 142-38.I Cannabis.(a)(3) of the Township Code. The ~.62 acre plat will easily accommodate the minimum 35 parking spots we would be required to provide (~5,000 square feet * 5.5 + 7 employees = 34.5). Accounting for ADA compliance and designated handicap parking, we estimate between 40-50 parking spots will be made available after site improvements.

12.0 – SIGNAGE

To inform our customers of the legal requirements necessary to make a purchase at a licensed cannabis retail dispensary in the State of New Jersey, we will post prominent signs at the entrance and all checkout areas. The signs will use bold, easy-to-read fonts and high-contrast colors to grab attention and ensure visibility and legibility. We will also include symbols such as a crossed-out “21” or a picture of an ID to help reinforce the message visually. The sign(s) will read as follows, pending approval from the CRC and Haddon Township:

ATTENTION

IT IS ILLEGAL TO SELL CANNABIS TO ANYONE UNDER 21 YEARS OF AGE

All customers must be 21 years or older to make a purchase
Valid ID is required for **ALL** purchases
No ID = No Sale

Thank you for your cooperation!

13.0 – PROCEDURE FOR CUSTOMERS EXHIBITING SIGNS OF ABUSE

In the event of a customer exhibiting signs of alcohol or substance abuse, our staff will be trained on the following key steps:

- Observation: Employees are trained to recognize signs like slurred speech, impaired motor skills, and erratic behavior.
- Engagement: Approach the customer calmly and inquire about their well-being without making accusations.
- Refusal of Service: Politely refuse to sell cannabis, as serving intoxicated individuals is prohibited by law, and de-escalate if needed.
- Safety: Ensure the safety of others, involve security or law enforcement if necessary, and avoid physical confrontation.
- Documentation: Record the incident and report it to management.
- Training: Employees should be trained in de-escalation and handling intoxicated customers, with regular updates to procedures in line with state laws.

14.0 – DELIVERY AND SHIPPING PROCEDURES

We will comply with N.J.A.C. 17:30-12.8 in our plans to deliver cannabis items to consumers. In accordance with § 142-38.I Cannabis.(a)(5) of the Township Code, we will maintain separate 10' X 20' spaces for loading and unloading of any deliveries, separate from the patron entrance. All deliveries will be restricted to small trucks and sprinter vans within a street or public right-of-way or within Golden Alley. All shipments received through the secure, dedicated delivery entrance will be continuously monitored by the surveillance and alarm infrastructure, and all shipments will be received in accordance with the two-person chain of custody rule to ensure accuracy, compliance, and transparency. The complete series of procedures and our demonstration of relevant regulatory compliance thresholds follow in what is normally a stand-alone volume in the CRC application. In the sections that follow, we demonstrate our ability to create a compliant, effective, and highly secure delivery plan; vet, hire, and train staff on the proper use of supporting technology, equipment, and the strict adherence to policies and procedures; obtain and maintain the equipment and technology necessary to conduct delivery services; and implement policies and procedures that ensure the safety of consumers, compliance with regulations, and longevity of our business and the industry as a whole.

14.1 – Delivery Scope

Contingent upon award of a license and identifying a licensed Class 6 Delivery business to partner with, we intend to authorize a Class 6 license holder to deliver cannabis items to consumers on our behalf pursuant to N.J.A.C. 17:30-14.8(a). We may also sell wholesale bulk, packaged, and/or labeled product to another cannabis retailer to conduct deliveries on its behalf per N.J.A.C. 17:30-14.8(w). We may charge a delivery fee in accordance with N.J.A.C. 17:30-14.8(v). Per N.J.A.C. 17:30-14.8(g)(1) and (2), we understand that we shall only deliver to a residence, including a temporary residence, in the State of New Jersey, and to a legal consumer whose age has been verified by an examination of the consumer's photographic identification.

We also acknowledge that we are only authorized to deliver cannabis items in person and are not allowed to use an unmanned vehicle in accordance with N.J.A.C. 17:30-14.8(g)(3).

In accordance with N.J.A.C. 17:30-14.8(b)(1)-(4), as approved by the Commission, and pursuant to N.J.S.A. 24:6I-44.j, cannabis business delivery personnel or a cannabis delivery service may deliver cannabis to a consumer at a residence on behalf of a cannabis retailer with the following considerations:

1. Cannabis retailers may engage in delivery in any region and may institute geographic and hourly restrictions on where and when they opt to deliver to consumers.
2. Any such restrictions shall be reported to the Commission and listed on the cannabis retailer's Internet website.
3. Cannabis retailers may change those restrictions; provided, however, that the cannabis retailer gives advance notice of seven days to the Commission and the municipality in which the cannabis retailer is located, the cannabis retailer notifies consumers, and the cannabis retailer posts the changed restrictions online.
4. If servicing different geographic areas on different days or at different times, cannabis retailers shall implement a regular schedule to the extent practicable.

14.2 – Delivery Plan Approval

In accordance with N.J.A.C. 17:30-14.8(x)(1)-(8) and prior to initiating delivery services, we and a licensed cannabis delivery service must develop and provide the Commission with a delivery plan for approval. This plan shall include SOPs for:

1. Taking orders, verifying photographic identification, and taking payments;
2. Logging the transactions in the Commission-designated inventory management system and, as applicable, internal inventory;
3. Conducting in-person deliveries, which shall include protocols for use of personal protective equipment and regular sanitation, if necessary;
4. Maintaining privacy and confidentiality of the purchasing consumer's purchase information;
5. Training cannabis business delivery personnel;
6. Tracking delivery vehicles and inventory;
7. Security for cannabis business delivery personnel, delivery vehicles, and inventory; and
8. Emergency notification and response in the event of accidents, theft, equipment malfunction, or other emergency events.

14.3 – Delivery Personnel

We will ensure the dedicated staff conducting the delivery services are trained to conduct all facets of delivery operations through the expert use of technology and equipment and the strict adherence to policies and procedures. In accordance with N.J.A.C. 17:30-14.8(o)(1)-(4), all delivery personnel must carry the following while conducting a delivery:

1. Their Cannabis Business Identification Card;
2. A valid non-probationary driver's license appropriate to the type of delivery vehicle driven;
3. A cellular telephone to communicate securely with the cannabis retailers; and
4. A physical or electronic copy of the consumer's delivery request.

In consideration of recent public health issues, we shall implement protective measures for delivery to reduce the spread of COVID-19 and other communicable diseases as recommended by the New Jersey Department of Health, the United States Centers for Disease Control and Prevention, and Occupational Safety and Health Administration, or health care professionals to the extent practicable, including, but not limited to, providing cannabis delivery personnel with hand sanitizer and personal protective equipment per N.J.A.C. 17:30-14.8(n). Also, we shall provide the Commission with a list of all personnel that will be used as cannabis business delivery personnel, documentation that they have received training for the position, and verification that they have valid non-probationary driver's licenses appropriate to the type of delivery vehicle driven in accordance with N.J.A.C. 17:30-14.8(t).

14.4 – Vehicles and Supporting Equipment

Contingent upon license award and approval of our delivery plan, dedicated vehicles with specific features enabling the secure transportation and accurate accountability of cannabis must be procured. In an effort to maintain a low profile and in accordance with N.J.A.C. 17:30-14.8(p), any delivery vehicle used shall bear no markings that would either identify or indicate that the vehicle is used to deliver cannabis items. The vehicle(s) must have a compartmentalized, secure, and sanitary lockbox capable of storing cannabis items during transit that is not visible from the outside or through a window. The vehicle must also be equipped with or contain an operational GPS device at all times per N.J.A.C. 17:30-14.8(q) as well as a vehicle alarm system and functioning locks. A complete list containing current information on all delivery vehicles, including each vehicle's make, model, color, vehicle identification number, license plate number, and vehicle registration, shall be provided to the Commission per N.J.A.C. 17:30-14.8(s). Additionally, we and the licensed delivery service shall maintain current hired and non-owned automobile liability insurance sufficient to insure each delivery vehicle in the amount of at least \$1,000,000 per occurrence or accident in accordance with N.J.A.C. 17:30-14.8(r).

14.5 – Standards and Procedures

We have developed standards and procedures pertaining to the execution of delivery activities in accordance with the regulations defined in N.J.A.C. 17:30-14.8. Delivery operations will be conducted by at least one authorized delivery staff member that is remotely monitored by a supervisor with real-time GPS tracking access of the delivery vehicle in accordance with N.J.A.C. 17:30-14.8(f). In an effort to keep costs down and maintain operational efficiency, we will plan for multiple deliveries along an optimized route in a single trip when practicable to facilitate timely and efficient deliveries per N.J.A.C. 17:30-14.8(j)(1). The pre-planned routes will be made only between the retail premises and residential delivery addresses, except in the event of emergency, dangerous road conditions, or as necessary for sanitization, rest, fuel, or vehicle repair stops per N.J.A.C. 17:30-14.8(j). In accordance with N.J.A.C. 17:30-14.8(j)(2), the cannabis retailer delivery or cannabis delivery service personnel driving the delivery vehicle shall comply with all rules under this section and all New Jersey laws, rules, and regulations for the operation of vehicles on public roadways during delivery operations. In the event of a route deviation or any other issue listed above, the delivery staff member will immediately communicate with the supervisor to ensure safety, security, accountability, and compliance with all applicable regulations. All orders for home delivery shall be placed in advance, with the

cannabis items assembled for delivery at the cannabis retailer premises per N.J.A.C. 17:30-14.8(c). When a consumer places an order for delivery for the first time, our team will validate the consumer's age by phone or through online means, provided that an in-person verification is conducted by delivery personnel prior to sale per N.J.A.C. 17:30-14.8(c)(1).

14.5.1 – In Transit

Once the order(s) are prepared, inventoried, and accounted for via the two-person chain of custody standard, they will be securely stored and locked in a sanitary and secure lockbox in the delivery vehicle until the cannabis business delivery personnel arrive at the delivery address in accordance with N.J.A.C. 17:30-14.8(d). During transit, the vehicle GPS system will be activated and delivery staff will regularly report to the supervisor at pre-designated phaselines along the route and/or at timed intervals, whichever is more frequent. When outside the vehicle to conduct a delivery or for any other reason, delivery personnel will lock the delivery vehicle and the secure lockbox and engage the vehicle alarm system per N.J.A.C. 17:30-14.8(e). At the door of the consumer's residential address, delivery personnel shall conduct an in-person visual verification of the photographic identification of the consumer prior to furnishing the purchased cannabis items and completing the sale pursuant to N.J.A.C. 17:30-14.8(i). Information logged during the delivery transaction is defined below in **14.5.2 – Reporting and Recordkeeping**. Delivery staff may not leave cannabis items unattended, such as on a porch or stoop, and are not allowed to deliver in mailboxes, post office boxes, or to any residence located on land owned by the Federal government or any residence on land or in a building leased by the Federal government per N.J.A.C. 17:30-14.8(h). In the event a delivery is attempted and not completed for any reason, and the cannabis item remains in the delivery staff's possession, delivery personnel shall return the cannabis item(s) to the originating retailer at the conclusion of the route. The retailer may then repackage and restock the product, logging the product's amended status in the internal inventory, only if the product is in new, unopened condition prior to restocking per N.J.A.C. 17:30-14.8(m).

14.5.2 – Reporting and Recordkeeping

Pertaining to reporting and recordkeeping requirements in accordance with the regulations, delivery staff will be trained to ensure the proper and accurate logging of information for the purposes of internal review and in the event that the Commission or any other applicable regulatory entity needs to review our records for any reason. In accordance with N.J.A.C. 17:30-14.8(l)(1)-(5), comprehensive delivery records of every delivery conducted by our company or on our behalf will be maintained in physical form and electronically in a cloud-based drive as applicable, consisting of the following information:

1. Date and time that the delivery began and ended;
2. Name, address, and signature of the consumer delivery recipient;
3. Name and Cannabis Business Identification Card number of cannabis retailer delivery or cannabis delivery service personnel;
4. The name, amount, batch or lot number(s), and tracking number(s) of the cannabis items(s) delivered; and
5. Confirmation of photographic identification verification.

Per N.J.A.C. 17:30-14.8(k), all transactions, including the information listed above, will be appropriately logged in the Commission-designated inventory management system and, as applicable, our internal inventory in accordance with N.J.A.C. 17:30-9.7 and 9.13 and other corresponding rules. Also, any vehicle accident, instances of diversion or losses, or other reportable events that occur during delivery will be documented and reported to the appropriate State and local authorities, including the Commission, per N.J.A.C. 17:30-14.8(u).

15.0 – SAFETY AND SECURITY SUMMARY

Our team is fully committed to launching a successful operation in New Jersey to benefit the consumers and state, all while maintaining compliance with all applicable state and municipal regulations. We understand the importance of maintaining a highly skilled, qualified, and vetted workforce capable of employing safety- and security-related technology and equipment in accordance with sound plans, policies, and procedures.