SECTION A. BUSINESS INFORMATION OF APPLICATION
Sub-Section A.2. Summary of Applicants Qualifications

Vintage Foods Ltd. dba PharmaFarm has been in research and development of its medicinal cannabis program for over four years. During this time the company's founder and president David Kimmel has traveled domestically and internationally including Canada, Israel, Washington State, Colorado, Rhode Island, Maine and Washington D.C. researching and studying techniques for the growing, curing, manufacturing and research and development of pharmaceutical grade medicinal cannabis products and industry standards for crop contaminant mitigation, extraction methodologies, security procedures, laboratory protocols, QA programs, strain development and unit-dosed pharmaceutical packaging concepts.

The Company has spent a significant amount of time researching cannabis sativa and indica strain active compounds and their pharmacodynamic relationship to the body's endocannibinoid system and the potential of these cannabinoids, terpenoids and flavonoids for the treatment of the diseases and the symptoms covered by Connecticut's Palliative Use of Marijuana legislation. Additionally the Company has been meeting with and learning from healthcare professionals, scientists and physicians who are currently leading the way on evidence-based research and education concerning the endocannabinoid system and therapeutic applications of endocannabinoid and cannabinoid agents. This includes continuing education from the School of Medicine, University of California, San Francisco, Cannabis in Medicine: A Primer for Health Care Professionals, educational programming provided by the CT-Yale LPS, New England AIDS Education and Training Center, funded by the US Department of HHS, Health Resources and Services Administration and as a member of the Canadian Consortium for the Investigation of Cannabinoids, meeting with and studying the research of Mark Ware MD, McGill University, J. Desroches, J. Guidon and P.Beaulieu, Department of Pharmacology, Faculty of

Medicine, Universite de Montreal, Quebec, Canada and Don Abrams MD a highly recognized expert in cannabis in cancer care.

As part of the Company's educational pathway, significant time has been allocated interacting with patients locally and nationally who suffer from a number of the diseases covered by Connecticut's legislation. Access to these patients and more specifically the lessons and knowledge gathered from them has been paramount in the Company's understanding on how this medication can clearly improve the quality of life for these truly ill people, this understanding and responsibility resonates to the core of the Company's mission statement. This patient interaction has also been instrumental in identifying for the Company the most appropriate delivery systems, dosing considerations, microbiological concerns and the need for standardized, concentrated, unit-dosed medication with the educational support required to insure that the medication is used properly, purposefully and medically. Company interaction with these many patients also reaffirms that the successful treatment of these diseases is not solely rooted in phytochemicals found in cannabis. It is also about lifestyle modification, nutrition, pro-active self-care and spirit and attitude.

The Company has also researched and studied the most current equipment and technology best suited to accomplish the goals of the Company's mission. This includes but is not limited to; the lighting manufacturers rejected from China and the premier manufacturer selected from Holland (Gavita), the safest extraction equipment for the concentration of the active compounds that can both meet the needs of the Connecticut patient population, maintain the integrity of those active compounds and that is the most environmental-friendly, water treatment and irrigation technologies to ensure heavy metal-free pure water, packaging that ensures the patient of a safe, reliable pharmaceutical quality product and in-house laboratory equipment and protocols to ensure a consistent, standardized unit dose.

The Company fully understands that PharmaFarm medicinal cannabis products will only be as good as the team involved in the growing, manufacturing and day-to-day operations of its program. To that end the Company has carefully chosen Lead Agronomist, Michael Nevas to direct and manage our agricultural program. Mr. Nevas a Connecticut native, has been mentored, trained and has worked in the cannabis industry as a legal grower for over eight years in Colorado, Montana and Washington State. His experience and skill-sets include a thorough understanding of all aspects of cannabis propagation and cultivation and has studied internationally to hone his agricultural craft. Additionally Michael is well read on the medicinal cannabis research works of Ethan Russo and John McPartland of GW Pharmaceuticals.

As additional support to the Company's grow team, David Kimmel has a personal, non-contractual informational exchange relationship with Oilseed Works Inc. of Canada. Oilseed Works Inc. is the oldest industrial hemp grower in Canada and for over two years, Kimmel has been traveling to Barre, Canada to study, research and learn about industrial hemp, its phytochemical properties, pest mitigation, strain development and growing techniques.

The PhamaFarm team also includes consultant John Arnett, PhD, Seven Hill Chemicals, a pharmaceutical volatile oil extraction specialist, consultant Steven Kushner, ALM R&D, an expert in nutrition and topical application research and development, Jeffery Zimmerman, Tai-chi Master and Energy Mover and Rose Habib a highly regarded cannabis specialist who comes out of the pharmaceutical industy. Ms. Habib has significant experience in volume extraction processes, unit-dosing, potency testing, quality control, delivery systems and cannabis infused product manufacturing.

The day-to-day management of the Company's operations will be the responsibility of the Company's President and General Manager David Kimmel.

Kimmel's background in food and beverage operational management includes but is not limited to budgetary responsibility for business operations with annual gross revenues of $5.2 million dollars, an employee staff of 36 full-time and 17 part-time associates, cash handling and accountability procedures, software management, human relations, marketing, quality control, Serve-Safe sanitation procedures and in-depth volume production and manufacturing experience. His career also includes agricultural experience in growing, packaging, exporting, importing, distribution, marketing and sales of fresh Camarosa strawberries, Highbush blueberries and Naval oranges from Argentina, the growing and sauce processing of heirloom tomato products from New England and the processing of pomegranate concentrates, essential oils and aromas from India and Turkey. Kimmel has been an instructor at the Culinary Institute of America, lectures annually at Fairleigh Dickenson University on nutrition, health and wellness and currently serves as an adjunct professor at SUNY Rockland since 2008, teaching courses in Purchasing and Inventory Control, Alcoholic Beverage Management and Food and Culture in America. Kimmel has also had been licensed and was in operational possession of a New York liquor license, New York Lotto license and a USDA Import Permit for Plants and Plant Products.

Additionally Kimmel has developed and operationally launched projects for Dick Clark Productions, The Inn of the Mountain Gods, Mommy Made and Daddy Too!, Smart Juice Organic Juice, Gold Star Electronics, Doubletree Hotels and numerous other clients.

It is the culmination of our research and our collective team that has led to the Company's production model that will;

- focus on the manufacture and standardization of concentrated cannabis medication to support the greatest patient efficacy.

- consistently produce uniformed, unit-dosed products for safe, reliable and secure patient titration.
- promote delivery systems that are not combustion-based and therefore healthier for patients.
- not promote the use tetrahydrocannabinol other than as part of the entourage effect required to treat the symptoms and diseases under Connecticut's Palliative Use of Marijuana legislation.
- deliver the highest grade of pharmaceutical cannabis medication possible, at the lowest possible price point.

SECTION A. BUSINESS INFORMATION OF APPLICANT
Sub-Section A.3 Financial Statement Year 1

SALES RATIONALE ASSUMPTIONS

- PharmaFarm expects that the state patient registry will increase from the over 1200 patients registered for the program as of early November 2013 to approximately 3600 patients when the medication is available to the patient marketplace by early summer 2014.
- Based on the assumption that only three Producer licenses will be issued, the following financial projections have been formulated to reflect the number of products being sold, based on the projected registered patient demand.
- The Company projects that based on the efficacy of concentrated medication, the demand will be significant. For projection purposes, one-third of the projected total Connecticut market share is expected to be captured by PharmaFarm products.
- For projection purposes, revenue streams have been broken-out into two main sales categories. These two categories represent the Company's two primary product lines, **which ultimately will be driven by patient market demand.**

a). Concentrates	82% of Total Sales
b). Whole Plant Flowers	18% of Total Sales

Concentrates

The Medium Daily Dose Amount was used in the financial projections.

	Patients Monthly	Daily Dose Amount
Low	1000	1/8 -1/4 gram
Medium	1000	1/4 - 1/2 gram
High	1000	3/4 – 1 gram

Whole Plant Flowers

Due to the weakened efficacy of whole plant materials, the Company projects the Daily Dose amount will be higher than that of concentrated products and the High Daily Dose Amount was used in these projections.

	Patients Monthly	Daily Dose Amount
Low	200	3/4 gram
Medium	200	1.5 grams
High	200	2 grams

CONCENTRATES

- Patient medication demand has been projected at 1 gram every 4 days or 7.5 grams monthly.
- Projected wholesale price per unit gram is $30.00.
- Projected SRP per unit gram is $60.00 (a 50% margin for the dispensary.)

WHOLE PLANT FLOWERS

- Patient medication demand has been projected at 2.3 ounces monthly.
- Projected wholesale price per unit ounce is $125.00.
- Projected SRP per unit ounce is $250.00 (a 50% margin for the dispensary.)

To meet the needs of our patient projections, the PharmaFarm production facility will need to produce on a monthly basis;

- 291 plants for concentrated sales.
- 122 plants for whole plant sales.
- Total production requirements based on projected patient needs = 413 plants, of an existing capacity to produce 500 plants as per current plan.
- 87 plants or 347 ounces available to satisfy additional market demand before any expansion changes are required.

PROJECTED PROFIT AND LOSS STATEMENT – YEAR 1

SALES		
Concentrates[1]	2,700,000	
Whole Plant Flowers[2]	600,000	
TOTAL SALES		**3,300,000**
COST OF GOODS		
Plant Costs[3]	150,000	
TOTAL COST OF GOODS		**150,000**
GROSS PROFIT		**3,150,000**
EXPENSES		
Labor		
General Manager	120,000	
Lead Grower	75,000	
Second Lead Grower[4]	37,000	
Assist. Grower/Vegetative	45,000	
Grower Team[5]	240,000	
Lab Manager	70,000	
Manufacturing Team[6]	72,000	
Security/Logistics[7]	100,000	
Bookkeeper/Office Mgr.	73,000	
Educational Marketing	73,000	
Programming	73,000	
Total Labor		**978,000**

Employee Benefits		
Employee Taxes[8]	135,000	
Health Insurance[9]	130,000	
Total Employee Benefits		**265,000**
Occupancy Costs		
Rent	113,000	
Property Tax	9,000	
Landscaping	4,000	
Snow Removal	6,000	
Property Insurance	4,000	
Management Costs	6,000	
Total Occupancy Costs		**142,000**
Utilities		
Electric[10]	240,000	
Gas	60,000	
Water & Sewage	10,000	
Total Utilities		**310,000**
Licenses & Permits		
CT Med Cannabis License	75,000	
CT Med Employee Registration	2,500	
CT Physical Facility Change Fee	1,500	
CT Producer Backer Fee	1,000	
CT Expansion Fee	3,500	
CT Brand Registration	1,250	
Fire Permit	750	
Health Permit	tba	
Weights & Measures	250	
Other Business Licenses/Permits	4,000	
Fire Extinguisher Inspection	1,000	
Total Licenses and Permits		**91,750**
Insurance		
Product Liability	-	
Directors and Officers	-	
General and Professional Liability	-	
Inventory and Crop Insurance	-	
Property Insurance	-	
Business Personal Property	-	
Auto and Cargo Transportation	-	(total projected at $34,500)
Surety Bond	300,000	(15% annually high end)
Total Insurance		**337,000**
Operating Expenses		
Telephone, Internet, Fax	3,700	
Security Monitoring	4,000	
Packaging[11]	70,000	
Refuse Removal	6,000	

Manufacturing Ingredients[12]	35,000	
Lab Supplies	4,000	
Printing Costs[13]	18,000	
Bulk Packaging[14]	3,200	
Nitrogen Flush	7,000	
Uniform Replacement	3,500	
Bank Fees	3,000	
Professional Services	20,000	
Research & Development[15]	150,000	
Continuing Education[16]	40,000	
Community Support[17]	95,000	
Travel[18]	20,000	
Distribution Expense[19]	9,000	
Repairs & Maintenance[20]	23,000	
Entertainment[21]	19,000	
Education Marketing[22]	48,000	
Office Supplies[23]	5,000	
Cleaning Supplies[24]	4,000	
Other Supplies[25]	13,000	
Lease Payments[26]	36,000	
Lab/Pass Fail[27]	63,000	
Loss	15,000	
Contingency	100,000	
Total Operating Expenses		**817,000**
Grand Total Expenses		**2,941,150**
Net/Profit Loss before Taxes		**208,850**

FOOTNOTES

[1] 1000 patient's monthly x $225 per patient wholesale.

[2] 200 patient's monthly x $250 per patient wholesale.

[3] Plant costs include all nutrients, Co2, seeds, rooting gels and all other, ties, cloning materials, grow bags, rooting materials, predator bugs, sticky traps and other any other plant specific materials including RFID tags, plant labels, organic treatments and misc. supplies.

[4] Grow management coverage will be seven days weekly. The Second Lead Grower will cover the days off of the Lead Grower and assist on times when extra assistance is required. This will be a part-time position in Year 1 at three days weekly and will expand to full-time as production requires.

[5] The Grow Team will consist of six growers, each working 8 hours daily spread over 7 days weekly. Each grower will be paid $40,000 annually.

[6] The Manufacturing Team will consist of 2 associates, each working 8 hours, 5 days weekly. Each associate will be paid $36,000 annually.

[7] Security will be comprised of 2 full time associates and 1 part time associate. Each full time associate will be paid $41,600 annually.

[8] CT State Unemployment Insurance $45000
Social Security $65,000
Medicare $15,000
IRS FUTA including tax credit $6,000

Increases projected for 2014: $4,000
Total Employee Taxes: $135,000

[9] The company projects to contribute $600 monthly to the payment of health insurance for each full-time employee. 18 full time employees are projected.

[10] Electric costs include lighting, Co2 extraction and other equipment sufficient to operate the facility. Costs are currently projected at $20,000 monthly.

[11] Packaging Breakdown

Liquid Capsules:	Vial, Barrier Proof Bag, Label	$0.40 ea.
Oil –Vap:	Oral Dispenser, Barrier Proof Bag, Label	$0.40 ea.
Oil – Oral:	Oral Dispenser, Barrier Proof Bag, Label	$0.40 ea.
Oil – E-Vap:	Oral Dispenser, Barrier Proof Bag, Label	$0.40 ea.
Lozenge:	Tube, Barrier Proof Bag, Label	$1.25 ea.
Skin Application:	Oral Dispenser, Barrier Proof Bag, Label	$0.65 ea.
Whole Plant Flower:	Vial, Barrier Proof Bag, Label	$0.25 - $0.95 ea.
Culinary Oil:	Bottle, Shrink-wrap, Label	$2.25 - $3.25 ea.
Average Cost:	Based on a Projected Sales Mix	$0.55 ea.
Shipping:	Case, Tape and Label	$0.12 ea.
Total Packaging Cost:		$0.67 ea.
Units Sold Monthly:	8200	
Waste:	$4,000	
Total Costs:	$70,000 (sales mix projects 70% sales in capsules and oral/vaporized concentrates.)	

[12] Manufacturing ingredients include natural and organic flavorings and essences, specialty culinary oils, FDA approved non-dietary supplement skin lotion materials, stevia and other food ingredients as permissible under Sec.21a-408-55.

[13] Printing costs include educational handouts, brochures and posters, forms, business cards, other.

[14] Bulk packaging materials for nitrogen flush and other requirements.

[15] See Section I.3. Research

[16] Trade shows, seminars, international exchange program, grow workshops, guest grower program and training. (See Section I.1 Employment Working Environment Plan.)

[17] Includes the P.A.V.E. The Way program, community education, Office of the Aging support, high school laptops, Fire Department contribution, community activism, Parks & Recreational support, WE CARE (Early Childhood Intervention) support and Youth and Social Services Substance Abuse Support. (See Section I.2 Compassionate Need Plan, Section 1.4 Community Benefits Plan and Section 1.5 Substance Abuse Prevention Plan.)

[18] Trade shows travel, international travel.

[19] Gasoline projected at $173.00 weekly.

[20] Vehicle, compressors, fan belts, equipment maintenance, lab equipment, maintenance, steam cleaning, bulb replacement, ballast replacement, air vent cleaning, vault, irrigation parts, tool sharpening, wall sanitizing, and service contracts costs.

[21] Employee meeting meals, employee holiday party, holiday gifts for the kids, business lunch/dinner meetings.

[22] Includes programming space, presentation costs, limited travel costs, educational materials.

[23] Copy paper, file folders, document back-up system, printer inks, fax inks, envelopes, cash bags, document storage containers, hanging files, checks and other general supplies.

[24] Detergents, disinfectants, sanitizers, floor cleaners, hand soap, bleach, mops, brooms, squeegees, mop buckets, wet floor signs, steel wool, sponges, hand towels.

[25] Small tools, gloves, hairnets, hats, bathroom supplies, aprons, break area beverages and snacks, serviceware,

[26] Processing equipment, vehicle, other.

[27] Projected at $200 per test to satisfy all state regulatory requirements. 12 products tested every two weeks.

SECTION A. BUSINESS INFORMATION OF APPLICANT
Sub-Section A.3. PROJECTED START-UP COSTS

LICENSES AND PERMITS	
Zoning Attorney	15000
State Permit Fee	75000
Building Permits	4000
Financial Backer Registration	1000
Employee I.D. Registration	2000
Health Permit	500
Weights & Measures	500
Fire Extinguisher Inspection	1200
Other Business Licenses/Permits	3000
TOTAL LICENSES AND PERMITS	**102200**
FACILITIES BUILD-OUT	
Architect	75000
Electrical	85000
Plumbing	50000
HVAC	210000
Construction	180000
Painting and sealing	15000
Refuse Removal	1500
Back-up Generator Connector	2500
Window Bars	6000
Window Treatments	2000
Perimeter Fence	20000
Perimeter Gate	21000
Parking Lot Repairs	7000
Contingency	40000
Landscaping and Equipment (Mower, trimmer)	7000
TOTAL FACILITIES BUILD-OUT	**722000**
BATHROOMS (Male, Female Handicapped)	
Urinals	500
Toilets (5)	1800
Sink, Cabinets and Faucet Sets	2000
Partitions	2000
Finishing (Paper Towel Dispenser/Air Blowers, Refuse Can, Hand Soap dispenser, deodorizer)	1500
Supply Closet	1000
TOTAL BATHROOMS	**8800**
EMPLOYEE BREAK ROOM	

Table and Chairs (Family style long tables)	1800
Refrigerators (2)	1200
Microwave	150
Coffee equipment	250
Sink	250
Counter Top-Cabinets Over & Under	1500
Television – wall mounted	300
Bulletin Board	25
TOTAL EMPLOYEE BREAK ROOM	**5475**
EMPLOYEE LOCKER AREAS	
Lockers	2800
Benches	800
TOTAL EMPLOYEE LOCKER AREA	**3600**
CONFERENCE ROOM	
Tables	600
Chairs (6)	900
Side Table	200
TOTAL CONFERENCE ROOM	**1700**
BOOKKEEPER OFFICE	
Desk	350
Chair	150
Storage Closets	1000
Filing Cabinets	300
Computer and Printer	1600
Copier/Fax Machine	300
Key Security System	2000
Counterfeit Detector	1200
Bill Counter	500
TOTAL BOOKKEEPER OFFICE	**7400**
LABORATORY	
High Pressure Liquid Chromatography	20000
Polymerase Chain-Reaction (PCR)	5000
Mass Spectrometer	8000
Refrigerator/Freezer	600
Office Set-up (desk, chair, computer, printer, file cabinet)	2000
Other Tabletop Equipment	1500
Digital Camera	300
USB Microscope Camera	250
Stainless Steel Tables	800
Small Equipment (beakers, containers, vials, etc.)	750
Other Equipment	6000
Shelving	1000
Hand Sink	225
Sink with drain boards	800
TOTAL LABORATORY	**47225**
EXTRACTION and UNIT PACKAGING	

Supercritical Co2 (with room for modular expansion)	130000
Other Equipment	50000
Steam Jacketed Kettles: 1- 5 gallon and 1-10 gallon	13000
Hood Vent	10000
Air Compressor	1750
Co2	2000
Unit Dose Packaging Equipment	18000
Heat Sealer	700
Nitrogen Flush (2)	10000
Smallwares	1000
Refrigeration	900
Freezer (chest)	700
Stainless Steel Tables	2750
Scales	1000
3-Bay Sink with Landing Tables	1750
Spray Arm	250
Portable Air Scrubber	2000
Ozone Generator	500
Storage Shelves	1500
Storage for Packaging	1000
Label Printers	1500
Flower Plant Processor	1500
Closet	1000
TOTAL EXTRACTION and PACKAGING	**252800**
PROPAGATION, VEGETATION AND FLOWER ROOM EQUIPMENT	
Co2 Burners (6)	3000
18" Oscillating wall-mounted fans	2000
Stainless Steel tables	4000
Mylar Reflective Curtains for Small Room Isolation	4000
Curtain Hanging System for Small Room Isolation	3000
Portable Air Scrubbers (Odor & Bacterial) (6)	12000
Ozone Generators	3500
Plant Tables	20000
Work Height Rolling Rubbermaid Adjustable Tables (3)	2000
Other Equipment	10000
Flex Cart Work Station	700
TOTAL PROPAGATION, VEG. AND FLOWER ROOM EQUIPMENT	**64200**
DRYING AND CURING	
Dehumidifiers (6) Portable	2000
Humidifier (6)	4000
HEPA Air Filters	500
Activated Charcoal Filters	1000
Retractable Hanging Lines	250
Hanging Clips	75
Rolling Baker Racks	15000
Rack Dollies (in lieu of Baker Racks and would cost much less)	-

Racks	3500
Ozone Generators (2)	1000
Portable Air Scrubber (1)	2000
Mechanical Flower Trimmer	18500
TOTAL DRYING AND CURING	**51325**
WATER TREATMENT and IRRIGATION	
Irrigation System	20000
Reverse Osmosis with Heavy Metal Active Charcoal filters	7000
Water Energizing and Oxygenation	10000
Water Pumps	1500
Extra Hose	350
Water Chillers (4)	2500
100 Gallon Barrels (4)	1600
Nutrient Tank	350
Magic Wand for Agitation	175
TOTAL WATER TREATMENT and IRRIGATION	**43475**
VAULT AREA	
Vault	80000
Smaller Vault within Vault (cash)	5000
Vault Shelving	2500
Segregated Vault Cage	750
Temperature and Humidity Requirements	2500
TOTAL VAULT AREA	**90750**
DISPENSARY PACKAGING AREA (located immediately outside of Vault)	
Stainless Steel Shelving	1000
Scale	500
Packaging Storage	1000
Tape Dispensers/Tape	75
Label Printer (for shipping boxes)	1500
TOTAL DISPENSARY PACKAGING AREA	**4075**
LAUNDRY	
Washer	1000
Dryer	1000
Coat Racks/Hangers	400
Stainless Steel Table	600
Sink and faucet set	500
TOTAL LAUNDRY	**3500**
MECHANICAL ROOM	
Phone system	3000
Other	5000
TOTAL MECHANICAL ROOM	**8000**
LOADING DOCK	
Hand Trucks (2)	500
Rolling Flatbed Carts (1)	600
Scale	500
Shelving	1500

Vehicle Exhaust Ventilation Connection, in-line fan	3000
Ramp Up/Down	12000
Accordion Door	1500
Storage and shelving	2000
Pallet Jack	400
TOTAL LOADING DOCK	**22000**
BULK STORAGE AREA	
Rubbermaid Rolling Refuse Cart with lid	500
Shelving	4000
TOTAL BULK STORAGE AREA	**4500**
EQUIPMENT STORAGE AREA	
Shelving	2000
TOTAL EQUIPMENT STORAGE AREA	**2000**
EQUIPMENT CLEANING AREA	
3-Bay Sink with Landing Tables	2000
Spray Hose	300
Stainless Steel Tables	1200
Storage Shelves	1000
TOTAL EQUIPMENT CLEANING AREA	**4500**
GROW OFFICE	
1 larger Desk – 2 Chairs	1000
Computer	1200
Printer/copier	350
Filing Cabinet	200
Shelving	300
TOTAL GROW OFFICE	**3050**
GENERAL MANAGER OFFICE	
Desk & Chair	800
Guest Chairs	400
End Table	200
Shelving	300
Printer	300
Computer	1200
TOTAL GENERAL MANAGER OFFICE	**3200**
SECURITY	
Cabinetry	2000
Video Monitors	5500
Cameras	62250
Motion Detectors	12000
Other Security Related Equipment	22000
Alarms and Door releases	12000
Software	1500
Chairs	350
Closets	2000
Shelving	750
TOTAL SECURITY	**120,600**

LIGHTING	
Flower Room Gavita Pro 1000w HPS and 300w LEP	102,000
T-5 high output florescent lights	3000
Duct work, back-draft dampers, clamps, seals, tape,	3500
Hangers	500
Ceiling connectors	400
Extra lighting supplies	1000
Laboratory	2000
Offices	3000
R&D Strain Room (included in flower room)	-
Trim Room and Dry Room	3000
Employee Break Areas	1500
Bathrooms	1000
Storerooms	1500
Loading Dock	1500
Conference Room	1500
Mechanical Room	500
Laundry Room	750
Irrigation Room	750
Hallways	3000
Entrance Way	1000
Security	750
Exit Signage	1750
Outside/Perimeter Lighting	12000
TOTAL LIGHTING	**145900**
SMALL EQUIPMENT and SUPPLIES	
Pruning Shears and Clippers	1500
Pocket Scopes and Magnifying Glasses	1500
Thermometers	900
Hygrometers	1000
Brix meters	800
pH meters	900
Chlorophyll meter	1000
RFID Hardware and Software	15000
Computer Software (word, excel, quick books, other)	2000
Time clock	600
Music System	1500
Industrial Wet/Dry HEPA Vacuum	600
Fogger/Atomizers	2500
Offices supplies	1000
Cleaning supplies	1000
Lab supplies	1000
Cloning Supplies	1000
Grow Supplies (trays, pots, bags, netting, other)	4500
Grow Medium (Coco – 1.5 cu ft. $23.)	4500

Rhizotonic		750
Boost		1000
Cannazym		1000
PK 13/14		1000
Canna Coco		1000
Seeds/Seedlings		12000
Nutrients		5000
Hydrogen Peroxide 3%		500
Sulfur and Burner		300
Mighty Wash 25 gallon		750
Power Wash 25 gallon		650
Mycorrhizae 6 gallon		720
Batteries		50
Flashlights		50
ID Badge Holders		50
Pocket-less Lab Coats		2000
Hats		250
Hair Nets and All Gloves		400
First Aid Kit		250
Portable Defibrillator		1500
Fire Extinguishers		1700
Interior Signage		750
Locks		2000
Garbage Cans with lids		400
Recycle Bins		300
Entry Mats		500
Extra HEPA and MERV 12, 13 Filters		1000
Rolling Carts		750
Hand Label Makers		90
Hand Vacuum (2)		425
Coat Racks		450
GPS Auto Tracking		500
Smart Phones		1000
TOTAL SMALL EQUIPMENT and SUPPLIES		**81885**
FACILITIES START-UP		
Deposits		10000
Rent (6 months)		60000
Utilities (6 months)		60000
Equipment Start-Up		2000
Refuse Removal		1500
Security Monitoring (6 months)		750
Secondary Security Monitoring		750
TOTAL FACILITIES START-UP		**135000**
LABOR (prior to first harvest)		
GM	6 months	60000
Lead Grower	6 months	38000

Second Lead Grower	6 months	20000
Assistant Lead Grower	4 months	13700
Grow Team	layered by time	50000
Lab Manager	1 month	5800
Manufacturing Team	first harvest	7000
Security	3 months	12000
Bookkeeper	4 months	25000
Marketing	1 month	6000
Programming	15 days	3000
Total Labor		240500
Employee Taxes		35000
TOTAL LABOR		**275500**
CONSULTANTS		
Cosmeceutical		12000
Chemist		6000
CONSULTANTS TOTAL		**18000**
MARKETING		
Printing		6000
Meetings		5000
Educational Presentations		5000
TOTAL MARKETING		**16000**
OTHER OPERATIONAL COSTS		
Meals and Entertainment		1500
Freight Charges		3000
Equipment Start-up		2500
State Laboratory Brand Requirements		1500
State Laboratory Testing Requirements		2500
Community Participation		5000
Insurance		9000
Travel and Relocation Costs		4000
Leased Equipment		8000
Health Benefits		45000
Ingredients		10000
Packaging and Label		
Barrier pouches by sizes		2500
Oral Applicators		1500
Glass Bottles		1500
Capsules		1000
Vials		250
Child Resistant Lids		800
Shipping Boxes		1000
Shipping Labels		500
Medication Labels		1000
Bank Costs		200
Website start-up and hosting		6000
Initial car lease payment		4000

Contingency	100000
TOTAL OTHER OPERATIONAL COST	**214500**
TOTAL COSTS	**2347955**
SURETY BOND	**300000**
CASH FLOW	**250000**
GRAND TOTAL PROJECTED START-UP COSTS	**2969955**

RECAP OF START-UP COSTS BY CATEGORY

LICENSES AND PERMITS	**102200**
FACILITIES BUILD-OUT	**722000**
BATHROOMS	**8800**
EMPLOYEE BREAK ROOM	**5475**
EMPLOYEE LOCKER AREA	**3600**
CONFERENCE ROOM	**1700**
BOOKKEEPER OFFICE	**7400**
LABORATORY	**47225**
EXTRACTION and PACKAGING	**252800**
PROPAGATION, VEGETATION AND FLOWER ROOM EQUIPMENT	**64200**
DRYING AND CURING	**51325**
WATER TREATMENT and IRRIGATION	**43470**
VAULT AREA	**90750**
DISPENSARY PACKAGING AREA	**4075**
LAUNDRY	**3500**
MECHANICAL ROOMS	**8000**
LOADING DOCK	**22000**
BULK STORAGE AREA	**4500**
EQUIPMENT STORAGE AREA	**2000**
EQUIPMENT CLEANING AREA	**4500**
GROW OFFICE	**3050**
GENERAL MANAGER OFFICE	**3200**
SECURITY	**120600**
LIGHTING	**145900**
SMALL EQUIPMENT	**81885**
FACILITIES START-UP	**135000**
LABOR	**275500**
CONSULTANTS	**18000**
MARKETING	**16000**
OPERATIONAL COST	**214500**
SURETY BOND	**300000**
CASH FLOW	**250000**
GRAND TOTAL START-UP COSTS	**2999955**

SECTION C. PROPOSED BUSINESS PLAN
Sub-Section C.1 Production Capabilities

FLOOR PLAN OVERVIEW
The PharmaFarm facility design has been engineered to allow for an accelerated plant growth cycle and methodology. The cannabis-specific agricultural technique being employed was developed in Holland and has been an immensely successful technique for our lead agronomist Michael Nevas but also for professional growers domestically and internationally. The industry refers to this cultivation technology as "Sea of Green" (SOG) and it is know for;

- Harvesting many smaller plants, matured early to realize the fastest production of available flowers.
- Instead of growing fewer plants for a longer period of time, in the same space, many smaller plants are grown that mature faster and in less time.
- Indoor facilities with plants that are taller, do not typically produce enough at the bottom of the plant to justify the extra growing time.
- Less time is required between crops.
- Lower electricity costs and more environmentally sustainable
- Allows for a leaf canopy that traps most of the light at the top level of the plants with little light penetrating below as the plants are close together. It Is the best use of the light and space and in as short as time possible.

The PharmaFarm floor plan allows for 6 (six) segregated, self-contained flower rooms and one central propagation and vegetative room. Each flower room could, for boutique pharmaceutical strain growth, be segregated by fire code approved blackout curtains to further break the rooms into halves or quarters. These 6 (six) segregated flower rooms offer;

- Superior control for contamination against infestation, mold and disease.
- Excellent security-enabled control points.
- Ability to create a variety of grow environments by lighting types, operating times and other agricultural variables to meet specific strain requirements.

Plans are also made for a separate R&D grow room for the development of emerging lighting, growing and agricultural technologies.

PRODUCTION CAPABILITIES
With the grow platform as designed, the company has the operational capability of;

- A harvest of 250 plants every two weeks.

- Each plant producing an average yield of 4 ounces of dried and cured raw material.
- **A biweekly yield of 1000 ounces** of dried and cured raw material or **2000 ounces monthly.**
- A majority of the materials to be used for extracted and concentrated products <u>however in Year 1, flower material will be available as required by patient demand.</u>

FUTURE PRODUCTION CAPABILITIES

Immediate Growth (6 month lead time to first harvest)

- The mezzanine would be configured for an additional 3 (three) flower rooms increasing production by an additional 1000 ounces monthly.

Short Term Growth (9 month lead time to first harvest)

- The indoor loading dock area moved to a secured, constructed new loading dock area, making the indoor space available for an additional flower room increasing production by 333 ounces monthly.
- The outdoor loading dock platform could be safely and securely enclosed to be made part of the grow facility. This would add an additional 2 (two) flower rooms increasing production by 666 ounces monthly.

Mid-Term Growth (1 year lead time to first harvest)

- The facility location has a 16' 8" clear height in the warehouse. The existing I-beams have a weight bearing load capacity to allow for a second floor (see Floor Plan - Second Floor.) These additional 6 flower rooms will increase production as if they were operating as 4 flower rooms. This is due to the fact that the mezzanine has already been accounted for above and space will be required for additional processing. This would add an additional 1250 ounces monthly.

Long Term Growth (1 1/2 years lead time to first harvest)

- Over half the parking lot to the rear of the building could be enclosed for additional grow space. This would still allow for over 40 employee parking spaces on-site. This additional space **has not** been included in the projections below.

Total Future Production Capabilities NOT Including Long Term Growth is 3249 ounces monthly.

GRAND TOTAL CURRENT AND FUTURE PRODUCTION CAPABILITIES

Current Design:	2000 ounces monthly of dried and cured material.
Future Expansion:	3249 ounces monthly of dried and cured material (not including Long Term Growth.)
Grand Total:	5249 ounces monthly of dried and cured material.

SECTION C. PROPOSED BUSINESS PLAN
Sub-Section C.2.a Products Offered in Year 1

PharmaFarms' operating platform is focused in the extraction of the phytochemicals found in the whole plant material. The company will be manufacturing products from these extractions that are concentrated, unit-dosed by active compound and standardized to deliver a safe and consistent dose to the patient.

In Year 1 and while the patients and physicians are initially educated on the benefits of concentrated cannabis medication, it is projected that the Company will sell whole plant material for vaporization and combustion. However by the end of Year 2, the Company fully expects to be 100% totally dedicated to the manufacture of concentrated medication and the delivery systems thereof.

PRODUCT DEVELOPMENT
Strain selection, strain development and product manufacturing will focus on the disease-specific symptoms treatable under the Connecticut program. The synergistic characteristics of the cannabinoids, terpenoids and flavonoids will be carefully cultivated to target these symptoms and manufactured into specific products. The Company's intention is not to use genetically modified seed stock.

Initial Strain Cultivation Focus	Medicinal Application
Flavonoids	
Apigenin	Anxiolytic (anxiety), Anti-inflammatory, Estrogenic
Cannflavin A	COX Inhibitor- Inflammation and Pain Lo Inhibitor – Slows/stops enzyme oxidation for cancer
Quercetin	Antioxidant, Antiviral, Anti-mutagenic (organism mutation), Anti-neoplastic (tumor growth)
Sitosterol	Anti-inflammatory, prostate cancer treatment
Terpenoids	
Borneol	Antibiotic
Carene	Anti-inflammatory
Caryophyllene	Anti-inflammatory, Antifungal, Anti-malarial
Cineole (Eucalyptol)	Antibiotic, Antiviral, Anti-inflammatory, Stimulant, Cerebral blood flow, Anti-ociceptive (pain sensitivity) AChE Inhibitor – increases the level and duration of the neurotransmitter acetylcholine (focus, concentration and memory)
Cymene	Antibiotic, Anti-candidal, AChE Inhibitor
Limonene	Immune Potentiator, Anti-depressant, Anti-mutagenic, possible Cannabinoid Agonist

Linalool	Sedative, Antidepressant, Anxiolytic, Immune Potentiator
Myrcene	Analgesic, Anti-inflammatory, Antibiotic, Anti-mutagenic, Sedative
Pinene	Anti-inflammatory, Bronchodilator, Stimulant, Antibiotic, Anti-neoplastic, AChE Inhibitor
Pulegon	AChE Inhibitor, Sedative, Antipyretic (reducing fever)
Terpineol	Sedative, Antibiotic, AChE Inhibitor, Antioxidant, Anti-malarial
Terpineol-4-ol	AChE Inhibitor, Antibiotic
Cannabinoids	
CBC-A (Cannabichromenic Acid)	Anti-bacterial, Anti-fungal
CBC (Cannabichromene)	Anti-Inflammatory, Antibiotic, Anti-fungal, Analgesic, Anti-neoplastic, Promotes Bone Growth
CBN (Cannabinol)	Sedative, Antibiotic, Oxidation Breakdown
CBG-A (Cannabigerolic Acid)	Anti-inflammatory
CBG (Cannabigerol)	Anti-inflammatory, Antibiotic, Anti-fungal, Analgesic, Anti-neoplastic
CBD-A (Cannabidiolic Acid)	Anti-inflammatory, Anti-neoplasitc
CBD (Cannabidiol)	Anxiolytic, Analgesic, Anti-inflammatory, Anti-psychotic, Anti-spasmodic, Appetite Stimulant, Anti-emetic (nausea reduction), Reduces Blood Sugar Levels, Treats Psoriasis, Anti-neoplastic, Prevents Nervous System Degeneration
THC-V (Tetrahydrocannabivarin)	Mild Euphoriant, Analgesic, Reduces Appetite, Reduces Seizures and Convulsions, Reduces Blood Sugar Levels, Promotes Bone Growth
8-THC (8-Tetrahdrocannabinol)	Resembles 9-THC Less Psychoactive, Anti-emetic,
9-THC (9-Tetrahdrocannabinol)	Euphoriant, Analgesic, Anti-inflammatory, Antioxidant, Anti-emetic, Anti-spasmodic
THC –A (Tetrahydrocannabinolic)	Anti-inflammatory, Anti-epileptic, Anti-neoplastic

PRODUCT DOSING

- Each of the Company's concentrate products will come with a dosing statement as it relates to the percentage of active compounds contained within that given product in relationship to its unit dose.
- The Company will **not** suggest product specific dosing amounts to avoid any conflict with the physicians' recommendation.
- The Company will offer under separate cover an educational marketing document titled "How Much Is Enough?" which will be a general guide on dosing by product and delivery system (see Section D - Proposed Marijuana Marketing Guide.)

KOSHER AND HALAL PRODUCT CERTIFICATION

- In July 2013, Vintage Foods Ltd. received written confirmation from Rabbi Eliyah Safran of the Orthodox Union and they have agreed to kosher PharmaFarm medicinal cannabis products.

- In August 2013, Vintage Foods Ltd. received written confirmation from the USA Halal ISWA Certification Department that they will not certify any medicinal cannabis products.

PHARMAFARM PRODUCT LINE

PRODUCT DESCRIPTIONS

CONCENTRATES

Item: Capsules
Delivery System: Oral
Description: Vegetarian based capsule filled with extracted and concentrated whole plant, phytochemical specific volatile oils. 6-8 brands projected.

Item: Oil Concentrate
Delivery System: Oral/Sub-Lingual
Description: Extracted and concentrated whole plant, phytochemical specific volatile soft-paste oil. 5-7 projected brands.

Item: Oil Concentrate
Delivery System: Vaporization
Description: Extracted and concentrated whole plant, phytochemical specific volatile oil-paste. 6-8 brands projected.

Item: Oil Concentrate
Delivery System: E-Vaporization
Description: Extracted and concentrated whole plant, phytochemical specific volatile oils. 4-6 brands projected.

Item: Medicated Lozenge **(pending DCP approval)**
Delivery System: Oral
Description: Extracted and concentrated whole plant, phytochemical specific lozenge. 2-4 brands projected.

Item: Culinary Oils
Delivery System: Oral
Description: Extracted, concentrated whole plant, phytochemical specific volatile oils, infused in highly nutritious food oils. 3-6 brands projected.

Item: Skin Treatment
Delivery System: Topical

Description: Extracted and concentrated whole plant, phytochemical specific volatile oil with other FDA approved non-dietary supplement ingredients. 1-3 projected brands.

WHOLE PLANT FLOWER

Item: Flower Tops

Delivery System: Combustion, Vaporization, Other by Patient Option

Description: Dried and cured whole plant flowers by specific phytochemical activity. 8-12 brands projected.

SECTION C. PROPOSED BUSINESS PLAN
Sub-Section C 2.a Labeling

MEDICATION LABELING GRAPHIC STANDARDS

- Minimum font size for Brand Name and Dose statement will be a 12 point or as close to that font as graphically possible.
  (study of adults and seniors found more self-administration medication errors with 9 point versus 12 point fonts.)
- Standardized font style such as Arial, Verdana or similar will be used for all text and numbers.
- No italic, oblique, narrow or condensed type fonts will be used.
- Use numeric versus alphabetic characters when describing dosing, concentrations or frequency of use.
- Typographic cues (bolding and highlighting) will be used for patient content.
- Horizontal text only to be used.
- Use white backgrounds for labels.
- Manage the amount of white space while insuring readability of text.
- Use thicker, denser lined letters when appropriate.
- Enhance the spacing of the lines for easy reading.
- Organize the label content in a patient-centered format.
- Keep the language simple and avoid unfamiliar words or medical jargon.
- Use mixed case (upper and lower case) letters.
- Avoid abbreviations of dosage information, unit of measure or dangerous drug information.
- No trailing zeros (e.g. 2 mg. not 2.0 mg.)
- Use leading zeros for does less than a whole number (e.g. 0.3 mg not .3 mg.)
- Include properly spaced commas for any numbers express in thousands e.g. 5,000 units)
- Do not us M as an abbreviation for thousands (e.g. 5 M units)
- Use standard metric abbreviations as follows;

g	=	gram
mg	=	milligram
mcg	=	microgram
L	=	liter
mL	=	milliliter

PACKAGING and LABEL MOCK-UP

The following includes packaging materials and labeling layouts for each product category.

LABEL SAMPLE: Capsules – Oral Dosing

PACKAGING

- Primary package: Blue colored plastic pill vial, child-resistant lid
- Secondary package: Nitrogen flush, heat sealed, zip-lock barrier-proof white pouch with clear front and solid back to allow for dispensary product verification prior to patient distribution.
- Producers' label will be placed on the back of package to allow for dispensary label on front of package.
- Desiccant package if necessary.

PharmaFarm (DCP Registered Brand Name) Capsules

Dose: 1 Capsule = Active Ingredient Profile **Dose Per Package:**

Packaging Date: / / Expiration Date: / / Serial Number:

Active Ingredient Profile:

Cannabinoids	**%**	**Terpenoids**	**%**
THC (9-Tetrahdrocannabinol)		Borneol	
THC –A (Tetrahydrocannabinolic)		Carene	
CBD (Cannabidiol)		Caryophyllene	
CBD-A (Cannabidiolic Acid)		Cineole	
		Cymene	
Flavonoid	**%**	Lemonene	
Apigenin		Linalool	
Cannaflavin A		Myrcene	
Quercetin		Pinene	
Sitosterol		Pulegon	

Lab Test Date: / /

Organic Certified _____Yes _____No

Kosher Certification: Orthodox Union

Lab Rating: _____Pass _____Fail

GMO Free: _____Yes _____No

Ingredients: Pure cannabis oil concentrate, vegetarian capsule

Medicinal Applications:

Description of Medicinal Affect:

Storage: Keep well sealed and store in a cool, dry and light-free location. Keep original label with product if transferred to a different container.

WARNINGS & ALERTS

Always consult your physician and your dispensary regarding the use of this medication. Discuss other medications currently being used either by prescription or off the shelf.

Motor Vehicle or Equipment Operation: This medication may cause drowsiness, affect mental alertness and/or coordination. If affected, do not drive a motor vehicle or operate machinery. Always ask your physician or dispensary for potential affects on your driving capabilities.

Risk Of Next Morning Impairment: The affects of this medication may continue the following day. If affected, do not drive or operate machinery. Consult your physician or dispensary immediately.

Pregnancy/Lactating: Consult your physician and your dispensary if pregnant or lactating before using this medication.

PharmaFarm
350 North Cherry Street Extension
Wallingford, CT 06492
Phone (203)-( )-( ) www.pharmafarm.com

KEEP OUT OF THE REACH OF CHILDREN

(COMPANY RFID SCAN)

LABEL SAMPLE: Oil Concentrate – Vaporization

PACKAGING

- Primary package: Tamper-evident oral dispenser, child resistant, with titration capabilities.
- Secondary package: Nitrogen flush, heat sealed, zip-lock barrier-proof white pouch with clear front and solid back to allow for dispensary verification prior to patient distribution.
- Producers' label will be placed on the back of package to allow for dispensary label on front of package.

PharmaFarm (DCP Registered Brand Name) Oil Concentrate- VAPOR

Dose: ___ mg = Active Ingredient Profile **Dose Per Package:**

Packaging Date: / / Expiration Date: / / Serial Number:

Active Ingredient Profile:

Cannabinoids	**%**	**Terpenoids**	**%**
THC (9-Tetrahdrocannabinol)		Borneol	
THC –A (Tetrahydrocannabinolic)		Carene	
CBD (Cannabidiol)		Caryophyllene	
CBD-A (Cannabidiolic Acid)		Cineole	
		Cymene	
Flavonoid	**%**	Lemonene	
Apigenin		Linalool	
Cannaflavin A		Myrcene	
Quercetin		Pinene	
Sitosterol		Pulegon	

Lab Test Date: / /

Lab Rating: _____Pass _____Fail

Organic Certified _____Yes _____No

GMO Free: _____Yes _____No

Kosher Certification: Orthodox Union

Ingredients: Pure cannabis oil concentrate

Medicinal Applications:

Description of Medicinal Affect:

Storage: Keep well sealed and store in a cool, dry and light-free location. Keep original label with product if transferred to a different container.

WARNINGS & ALERTS

Always consult your physician and your dispensary regarding the use of this medication. Discuss other medications currently being used either by prescription or off the shelf.

Motor Vehicle or Equipment Operation: This medication may cause drowsiness, affect mental alertness and/or coordination. If affected, do not drive a motor vehicle or operate machinery. Always ask your physician or dispensary for potential affects on your driving capabilities.

Risk Of Next Morning Impairment: The affects of this medication may continue the following day. If affected, do not drive or operate machinery. Consult your physician or dispensary immediately.

Pregnancy/Lactating: Consult your physician and your dispensary if pregnant or lactating before using this medication.

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Phone (203)-( )-( ) www.pharmafarm.com

KEEP OUT OF THE REACH OF CHILDREN

(COMPANY RFID SCAN)

LABEL SAMPLE: Oil Concentrate – Oral/Sublingual Dosing

PACKAGING

- Primary package: Tamper-evident oral dispenser, child resistant, with titration capabilities.
- Secondary package: Nitrogen flush, heat sealed, zip-lock barrier-proof white pouch with clear front and solid back to allow for dispensary verification prior to patient distribution.
- Producers' label will be placed on the back of package to allow for dispensary label on front of package.

PharmaFarm (DCP Registered Brand Name) Oil Concentrate – ORAL/SUB

Dose: ___ mg = Active Ingredient Profile **Dose Per Package:**

Packaging Date: / / Expiration Date: / / Serial Number:

Active Ingredient Profile:

Cannabinoids	**%**	**Terpenoids**	**%**
THC (9-Tetrahdrocannabinol)		Borneol	
THC –A (Tetrahydrocannabinolic)		Carene	
CBD (Cannabidiol)		Caryophyllene	
CBD-A (Cannabidiolic Acid)		Cineole	
		Cymene	
Flavonoid	**%**	Lemonene	
Apigenin		Linalool	
Cannaflavin A		Myrcene	
Quercetin		Pinene	
Sitosterol		Pulegon	

Lab Test Date: / /

Lab Rating: _____Pass _____Fail

Organic Certified _____Yes _____No

GMO Free: _____Yes _____No

Kosher Certification: Orthodox Union

Ingredients: Pure cannabis oil concentrate

Medicinal Applications:

Description of Medicinal Affect:

Storage: Keep well sealed and store in a cool, dry and light-free location. Keep original label with product if transferred to a different container.

WARNINGS & ALERTS

Always consult your physician and your dispensary regarding the use of this medication. Discuss other medications currently being used either by prescription or off the shelf.

Motor Vehicle or Equipment Operation: This medication may cause drowsiness, affect mental alertness and/or coordination. If affected, do not drive a motor vehicle or operate machinery. Always ask your physician or dispensary for potential affects on your driving capabilities.

Risk Of Next Morning Impairment: The affects of this medication may continue the following day. If affected, do not drive or operate machinery. Consult your physician or dispensary immediately.

Pregnancy/Lactating: Consult your physician and your dispensary if pregnant or lactating before using this medication.

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Wallingford, CT 06492
Phone (203)-( )-( ) www.pharmafarm.com

KEEP OUT OF THE REACH OF CHILDREN

(COMPANY RFID SCAN)

LABEL SAMPLE: Oil – E-Vaporization

PACKAGING

- Primary package: Tamper-evident dispenser, child resistant, with titration capabilities.
- Secondary package: Nitrogen flush, heat sealed, zip-lock barrier-proof white pouch with clear front and solid back to allow for dispensary verification prior to patient distribution.
- Producers' label will be placed on the back of package to allow for dispensary label on front of package.

PharmaFarm (DCP Registered Brand Name) Oil Concentrate E-VAPOR

Dose: ___ mg = Active Ingredient Profile **Dose Per Package:**

Packaging Date: / / Expiration Date: / / Serial Number:

Active Ingredient Profile:

Cannabinoids	**%**	**Terpenoids**	**%**
THC (9-Tetrahdrocannabinol)		Borneol	
THC –A (Tetrahydrocannabinolic)		Carene	
CBD (Cannabidiol)		Caryophyllene	
CBD-A (Cannabidiolic Acid)		Cineole	
		Cymene	
Flavonoid	**%**	Lemonene	
Apigenin		Linalool	
Cannaflavin A		Myrcene	
Quercetin		Pinene	
Sitosterol		Pulegon	

Lab Test Date: / /

Lab Rating: _____Pass _____Fail

Organic Certified _____Yes _____No

GMO Free: _____Yes _____No

Kosher Certification : Orthodox Union

Ingredients: Pure cannabis oil concentrate

Medicinal Applications:

Description of Medicinal Affect:

Storage: Keep well sealed and store in a cool, dry and light-free location. Keep original label with product if transferred to a different container.

WARNINGS & ALERTS

Always consult your physician and your dispensary regarding the use of this medication. Discuss other medications currently being used either by prescription or off the shelf.

Motor Vehicle or Equipment Operation: This medication may cause drowsiness, affect mental alertness and/or coordination. If affected, do not drive a motor vehicle or operate machinery. Always ask your physician or dispensary for potential affects on your driving capabilities.

Risk Of Next Morning Impairment: The affects of this medication may continue the following day. If affected, do not drive or operate machinery. Consult your physician or dispensary immediately.

Pregnancy/Lactating: Consult your physician and your dispensary if pregnant or lactating before using this medication.

PharmaFarm
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Phone (203)-( )-( ) www.pharmafarm.com

KEEP OUT OF THE REACH OF CHILDREN

(COMPANY RFID SCAN)

LABEL SAMPLE: Medicated Lozenge - Oral Dosing

PACKAGING

- Primary package: Tamper-evident tube with child resistant lid.
- Secondary package: Nitrogen flush, heat sealed, zip-lock barrier-proof white pouch with clear front and solid back to allow for dispensary verification prior to patient distribution.
- Producers' label will be placed on the back of package to allow for dispensary label on front of package.

PharmaFarm (DCP Registered Brand Name) Medicated Lozenge

Dose: 1 Lozenge = Active Ingredient Profile **Dose Per Package:**

Packaging Date: / / Expiration Date: / / Serial Number:

Active Ingredient Profile:

Cannabinoids	**%**
THC (9-Tetrahdrocannabinol)	
THC –A (Tetrahydrocannabinolic)	
CBD (Cannabidiol)	
CBD-A (Cannabidiolic Acid)	

Flavonoid	**%**
Apigenin	
Cannaflavin A	
Quercetin	
Sitosterol	

Terpenoids	**%**
Borneol	
Carene	
Caryophyllene	
Cineole	
Cymene	
Lemonene	
Linalool	
Myrcene	
Pinene	
Pulegon	

Lab Test Date: / /

Lab Rating: _____Pass _____Fail

Organic Certified _____Yes _____No

GMO Free: _____ Yes _____No

Kosher Certification: Orthodox Union

Ingredients: Agave, pure cannabis oil concentrate,

Medicinal Applications:

Description of Medicinal Affect:

Storage: Keep well sealed and store in a cool, dry and light-free location. Keep original label with product if transferred to a different container.

WARNINGS & ALERTS

Always consult your physician and your dispensary regarding the use of this medication. Discuss other medications currently being used either by prescription or off the shelf.

Motor Vehicle or Equipment Operation: This medication may cause drowsiness, affect mental alertness and/or coordination. If affected, do not drive a motor vehicle or operate machinery. Always ask your physician or dispensary for potential affects on your driving capabilities.

Risk Of Next Morning Impairment: The affects of this medication may continue the following day. If affected, do not drive or operate machinery. Consult your physician or dispensary immediately.

Pregnancy/Lactating: Consult your physician and your dispensary if pregnant or lactating before using this medication.

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Phone (203)-( )-( ) www.pharmafarm.com

KEEP OUT OF THE REACH OF CHILDREN

(COMPANY RFID SCAN)

LABEL SAMPLE: Skin Treatment – Topical Application

PACKAGING

- Primary package: Tamper evident dispenser, child resistant.
- Secondary package: Nitrogen flush, heat sealed, zip-lock barrier-proof white pouch with clear front and solid back to allow for dispensary verification prior to patient distribution.
- Producers' label will be placed on the back of package to allow for dispensary label on front of package.

PharmaFarm (DCP Registered Brand Name) Skin Treatment - Topical

Dose: ____ mg = Active Ingredient Profile **Dose Per Package:**
Packaging Date: / / Expiration Date: / / Serial Number:

Active Ingredient Profile:

Cannabinoids	**%**	**Terpenoids**	**%**
THC (9-Tetrahdrocannabinol)		Borneol	
THC –A (Tetrahydrocannabinolic)		Carene	
CBD (Cannabidiol)		Caryophyllene	
CBD-A (Cannabidiolic Acid)		Cineole	
		Cymene	
Flavonoid	**%**	Lemonene	
Apigenin		Linalool	
Cannaflavin A		Myrcene	
Quercetin		Pinene	
Sitosterol		Pulegon	

Lab Test Date: / /
Organic Certified _____Yes _____No
Kosher Certification: Orthodox Union

Lab Rating: _____Pass _____Fail
GMO Free: _____Yes _____No
Ingredients: Raw coconut oil, other, pure cannabis oil concentrate,

Medicinal Applications:
Description of Medicinal Affect:
Storage: Keep well sealed and store in a cool, dry and light-free location. Keep original label with product if transferred to a different container.

WARNINGS & ALERTS

Always consult your physician and your dispensary regarding the use of this medication. Discuss other medications currently being used either by prescription or off the shelf.

Motor Vehicle or Equipment Operation: This medication may cause drowsiness, affect mental alertness and/or coordination. If affected, do not drive a motor vehicle or operate machinery. Always ask your physician or dispensary for potential affects on your driving capabilities.

Risk Of Next Morning Impairment: The affects of this medication may continue the following day. If affected, do not drive or operate machinery. Consult your physician or dispensary immediately.

Pregnancy/Lactating: Consult your physician and your dispensary if pregnant or lactating before using this medication.

KEEP OUT OF THE REACH OF CHILDREN
NOT TO BE USED ORALLY OR FOR VAPORIZATION

PharmaFarm
350 North Cherry Street Extension
Wallingford, CT 06492
Phone (203)-( )-( ) www.pharmafarm.com (COMPANY RFID SCAN)

LABEL SAMPLE: Culinary Oil – Oral

PACKAGING and LABEL PLACEMENT

- Primary package: Amber glass bottle with child resistant lid.
- Secondary package: Shrink wrapped
- Producers' label will be placed on the back of package to allow for dispensary label on front of package.
- Unit dose dispenser top included with package.

PharmaFarm (DCP Registered Brand Name) Culinary Oil

Dose: ____ Tablespoons = Active Ingredient Profile Dose Per Package:

Packaging Date: / / Expiration Date: / / Serial Number:

Active Ingredient Profile:

Cannabinoids	**%**	**Terpenoids**	**%**
THC (9-Tetrahdrocannabinol)		Borneol	
THC –A (Tetrahydrocannabinolic)		Carene	
CBD (Cannabidiol)		Caryophyllene	
CBD-A (Cannabidiolic Acid)		Cineole	
		Cymene	
Flavonoid	**%**	Lemonene	
Apigenin		Linalool	
Cannaflavin A		Myrcene	
Quercetin		Pinene	
Sitosterol		Pulegon	

Lab Test Date: / / Lab Rating: _____Pass _____Fail

Organic Certified _____Yes _____No GMO Free: _____Yes _____No

Kosher Certification: Orthodox Union Ingredients: Flax Seed Oil, pure cannabis oil concentrate.

Medicinal Applications:

Description of Medicinal Affect:

Storage: Keep well sealed and store in a cool, dry and light-free location. Keep original label with product if transferred to a different container.

WARNINGS & ALERTS

Always consult your physician and your dispensary regarding the use of this medication. Discuss other medications currently being used either by prescription or off the shelf.

Motor Vehicle or Equipment Operation: This medication may cause drowsiness, affect mental alertness and/or coordination. If affected, do not drive a motor vehicle or operate machinery. Always ask your physician or dispensary for potential affects on your driving capabilities.

Risk Of Next Morning Impairment: The affects of this medication may continue the following day. If affected, do not drive or operate machinery. Consult your physician or dispensary immediately.

Pregnancy/Lactating: Consult your physician and your dispensary if pregnant or lactating before using this medication.

KEEP OUT OF THE REACH OF CHILDREN

PharmaFarm
350 North Cherry Street Extension
Wallingford, CT 06492
Phone (203)-( )-( ) www.pharmafarm.com (COMPANY RFID SCAN)

LABEL SAMPLE: Whole Plant Flower – Combustion/Inhalation

PACKAGING

- Primary package: Amber plastic vial sizing with child resistant lid.
- Secondary package: Nitrogen flush, heat sealed, zip-lock barrier-proof white pouch with clear front and solid back to allow for dispensary verification prior to patient distribution.
- Producers' label will be placed on the back of package to allow for dispensary label on front of package.

PharmaFarm (DCP Registered Brand Name) WPF (Whole Plant Flower)
Dose: ____ gram = Active Ingredient Profile Dose Per Package:
Packaging Date: / / Expiration Date: / / Serial Number:

Active Ingredient Profile:

Cannabinoids	**%**	**Terpenoids**	**%**
THC (9-Tetrahdrocannabinol)		Borneol	
THC –A (Tetrahydrocannabinolic)		Carene	
CBD (Cannabidiol)		Caryophyllene	
CBD-A (Cannabidiolic Acid)		Cineole	
		Cymene	
Flavonoid	**%**	Lemonene	
Apigenin		Linalool	
Cannaflavin A		Myrcene	
Quercetin		Pinene	
Sitosterol		Pulegon	

Lab Test Date: / / Lab Rating: _____Pass _____Fail
Organic Certified _____Yes_____No GMO Free: _____Yes _____No
Kosher Certification: Orthodox Union Ingredients: Dried and cured cannabis flowers

Medicinal Applications:
Description of Medicinal Affect:
Storage: Keep well sealed and store in a cool, dry and light-free location. Keep original label with product if transferred to a different container.

WARNINGS & ALERTS
Always consult your physician and your dispensary regarding the use of this medication. Discuss other medications currently being used either by prescription or off the shelf.
Motor Vehicle or Equipment Operation: This medication may cause drowsiness, affect mental alertness and/or coordination. If affected, do not drive a motor vehicle or operate machinery. Always ask your physician or dispensary for potential affects on your driving capabilities.
Risk Of Next Morning Impairment: The affects of this medication may continue the following day. If affected, do not drive or operate machinery. Consult your physician or dispensary immediately.

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SECTION C. PROPOSED BUSINESS PLAN
Sub-Section C.2. b. Facility Accessibility

The following outline addresses how PharmaFarm will ensure that access to the production facility premises will be limited to employees, visitors by Department of Consumer Protection authorization and emergency incidents.

- The facility will have chain-link security fencing around the building areas that could provide ingress or egress to the building.
- The fenced security perimeter will have one vehicular/pedestrian entrance/exit gate, this access point can only utilized by specific procedure.
- See Sub-Section C.2.e. for additional security information.

Normal Operational Hours and During Special Operational Needs

- Security will be on-site 1/2 hour before employees arrive for their shift until 1/2 hour after employees leave their scheduled shift.
- The entrance gate will be electronically operated from the security desk and by secured keypad with limited access to the code.
- The entrance gate area will have a motion-capable video camera that will focus on the entrance with zoom ability to validate the vehicle license plate, car make, model and occupant count.
- The entrance gate location will have a direct, two-way communication system that connects to the in-house security desk
- The security desk will have the ability to monitor the live video stream, communicate with those seeking access at the gate, electronically open and close the gate, electronically open and close the main entrance door and to validate all information prior to being given parking lot access.
- A cellular telephone number will also be posted at the gate for back-up support. This number will connect to the security desk during normal operating hours and to the 24 hour phone answering service otherwise.
- Any person looking to make pedestrian or bicycle entrance would, by gate and fence design as well as protocol, be required to follow the same procedures as entrance being required by a motor vehicle.

Operational Procedures

Parking Lot Entrance – Team Member Procedure

- Upon arrival of an employee for their work schedule, they will have to stop at the entrance gate, push the button and announce who they are and the purpose for requesting access.
- Security will verify the person is employed at PharmaFarm and that they are;

  a). On the schedule for work that day

  b). Check the video image to confirm that the vehicle make, license plate and match what is on file.

  c). Check the passenger count in the vehicle

  d). Once the above criteria is met, security will then electronically and remotely open the gate, watch the vehicle make entrance, insure no other vehicles follow and verify that the gate closes properly.

Parking Lot Entrance – Visitors Procedure

- Upon arrival of an individual who is not employed by PharmaFarm, they will stop at the entrance gate, push the button and announce who they are and their purpose for requesting access.
- Security will respond by verifying that the person requesting entry to the premises is approved for entry by;

  a). Verifying on the day's visitor schedule that this individual does have an appointment at the PharmaFarm facility and has received DCP clearance for a visit.

  b). By video monitor, verify the number of visitors in the vehicle, vehicle make, license plate number, time, date.

  c). Once the above criteria is met, invite and direct the visitor to the visitor's parking area and ask them to proceed once the gate opens.

  d). Electronically and remotely open the gate, watch the vehicle make entrance, insure no other vehicles follow and verify that the gate closes properly.

Building Entrance –Employees and Visitors Procedure

The following protocol outlines the steps for entry into the actual facility;

- Employee or visitor pushes the bell button at the entrance door.
- Security verifies by video monitor placed at the entrance door that it is the correct person.
- The door is electronically opened by security.
- The employee or visitor proceeds down the entry hall by layout.
- The employee or visitor by physical layout must pass by the security desk and stop for;

a). **Employee**: Pick-up their Employee ID badge, sign log for badge pick-up and proceed to the employee locker area for their shift.

b). **Visitor:** They are given a Visitor ID badge and security shall log them in to include, date, time and purpose of visit. The guest will be directed to the Company's lobby area where they must wait until they are met by their PharmaFarm meeting appointment and/or escort.

Building Exit – Employee Procedure

The employee shall;

- After clocking out, changing out of uniform and prepared to leave the facility, proceeds to the security desk with ID in hand.
- At the security desk, signs-out on the ID log sheet verifying that they are returning their ID badge.
- Proceed to the exit door, security electronically releases door for exit.

Building Exit - Visitor Procedure

The visitor shall;

- Be escorted to the security desk where the visitor returns their Visitor ID badge to security. Security logs them out of the Visitors Log with time.
- Borrowed visitor uniform apparel will be returned if necessary.
- Proceed to the exit door, security electronically releases door for exit.

Parking Lot Exit – Employees and Visitors

When an employee or visitor leaves the building, security will be required to electronically open the entrance/exit gate and to close it.

Emergency Entry Procedure - Normal Operating Hours

In the event emergency access is suggested or required by incident;

- Police, other law enforcement officials, fire department without a reported in-house emergency incident (accident, fire, alarm, other). Contact the General Manager immediately for access verification.
- Police or other law enforcement officials with an in-house reported emergency incident, allow for immediate access and notify the GM.
- Emergency medical services. If an accident in-house has been reported, allow for immediate access and notify the GM.
- Fire department officials with a reported in-house alarm or incident, allow for immediate access and notify the GM.
- Others, only with permission from the General Manager. Written notice must be immediately supplied to the DCP after any emergency entrance is required. Notice to include name and

company affiliation of the visitor, purpose of the visit, date and time of visit.

After Hours Emergency Entry

- The police department, fire department and any other required authority will have a 24 hour a contact cell phone number for the General Manager and a secondary contact in Senior Management to make arrangements for expedited access.
- The phone number posted at the gate will call to a 24-hour answering service during non-operational hours.

SECTION C. PROPOSED BUSINESS PLAN
Sub-Section C.2.c Odor Treatment Program

The PharmaFarm program for the treatment, mitigation and prevention of off-site odors has been designed to address odors as they occur throughout the growing, drying, manufacturing and packaging processes;

Sealed rooms

- Each room will be sealed with no direct air exchange with the outside.
- Each room will have HVAC capabilities to assist in capturing any airborne terpenoid dispersal and move them away for filtration.

In-Line Charcoal Air Filters

- Filters with activated virgin carbon, changed regularly, best suited to remove oil vapors, odors and other hydrocarbons.
- These filters will also be used all air ducts and any ducts expelling air to the outside.

Ozone Generators

- O3 has a high oxidation potential and will assist in the removal all bacteria and smells.
- Ozone generators will be placed in areas where cannabis is exposed to the open air within the facility and to avoid team member exposure.

Portable Air Scrubbers

- 1” coarse particulate pre-filter
- 2” pleated pre-filter
- High-output bacteria-killing UV technology
- 99.97% high-efficiency HEPA filters
- The air scrubbers locations will include any areas where cannabis is exposed to open air with the facility.

Barrier-Proof Bulk and Finished Product Packaging

- Multi-laminate foil and plastic
- minimum 3.4 mil
- nitrogen flushed to remove oxygen and aroma

Experience suggests that the above combination of mechanical odor protection devices, will meet the Department of Consumer Protection, the neighborhood the Company's standards. In the event there are still odor issues, the Company is prepared to;

- install a High Pressure Water Atomization process.
- add a precision controlled, fine water vapor and naturally occurring, U.S. Environmental Protection Agency approved odor counteractant.
- accommodated for auto-triggering by fan cycles;

SECTION C. PROPOSED BUSINESS PLAN
Sub-Section C.2.d. Training and Continuing Educational Opportunities

PharmaFarms' training and continuing education program is broken down into the following primary areas of focus and implementation;

a). New Hire Team Member Training
b). New Hire Grow Team Training
c). New Hire Manufacturing and Packaging Training
d). Regularly Scheduled Refresher Training for Full Staff
e). On-Going Continuing Educational (CE) Programming
- Senior management
- Grow team members
- Manufacturing team members

Upon completion of any program by any trainee, the trainee will be required to sign an Employee Training Log (see Sub-Section C.2.d. Employee Training Log attached below). signifying they have received the stated training. Each log will remain on file and the information on this log shall include;

- Training Subject
- Date, Time and Length of Training Session
- Trainer(s)
- Training Materials (used or distributed as part of the training session)
- Employee Name (printed and signed)
- Trainer Comments

1). NEW TEAM MEMBER GENERAL TRAINING

Training requirements for all new team members includes a full review of the following PharmaFarm documents.

PharmaFarm Presenter's: David Kimmel, General Manager
Michael Nevas, Lead Grower
Full Charge Bookkeeper

- The Employee Handbook (See Bonus Section, Sub-Section 1.1 Employee Working Environment Plan Employee Handbook)
- The Code of Ethics (see Bonus Section, Sub-Section 1.1 Employee Working Environment Plan Code of Ethics)
- Security and Control Rules and Requirements
  - DCP
  - PharmaFarm
  - Federal
- Chain of Command
- Job Description and Operational Responsibilities
- Community Activism and the P.A.V.E. The Way Program
- Substance Abuse Concerns and Programs
- Evacuation Plan and History of Incidents in Wallingford
- Ergonomic Program (see Sub-Section Bonus Points I.1 Employee Working Environment Plan Environmental Health & Safety Ergonomic Program)
- Illness & Injury Prevention Program (see Sub-section I.1 Employee Environment plan)
- Fire Prevention (see
- Handling Hazardous Materials (See
- Natural Disaster Training (see Sub-section C.2.d. Natural Disaster Training Hand-out)
- Entering and Exiting the Facility
- Entering and Exiting the Grow Area
- The Right Glove for the Right Job (see
- Employee Locker Room Use
- Break-Area Use
- Sanitation
- Parking
- Time-clock operation and other salary related issues.
- Theft and Diversion of Controlled Substances
- Interaction with Healthcare Professionals

2). NEW HIRE GROW TEAM MEMBER TRAINING
Training requirements for all new Grow Team members includes a full review of the following PharmaFarm cultivation criteria;.

PharmaFarm Presenter's: Michael Nevas, Lead Grower
Todd Orr, Second Lead Grower
David Kimmel, General Manager

Daily Routines - Beginning of Day

- **Check in with security**: Upon entry into the facility, check-in at the security desk and sign-in. Security will give you your work I.D. It must

be worn at all times visibly on your work uniform.

- **Change into work clothes:** Proceed directly to the locker room and change into work uniform, being careful to keep work clothes in a separate locker from your personal clothing.
- **Grow area entry:** Once properly attired and ready to work, check back in at the security desk, they will give you access to the grow room after punch-in on the time clock located across from the security desk. **TEAM MEMBERS ARE ONLY ALLOWED IN ENTER CANNABIS AREAS IF THEY HAVE THE PROPER AUTHORITY. ACCESS MAY BE GRANTED TO SOME AREAS BUT NOT ALL AREAS. IT WILL MADE CLEAR AS TO WHICH AREAS ARE OFF-LIMITS AND WHY.**
- **Environmental Inspection of each room:** , Go to assigned area and record the environmental conditions of each room. If adjustments are needed, consult the Lead Grower or their representative on staff for environmental control for guidance. DO NOT ADJUST any environmental conditions without the Lead Grower or their representative present.
- Room inspections must be divided and alternated between grow teams on shift, ensuring that no one inspects the same room two days in a row.
- Measure and record status of nutrient reservoirs, including PPM/EC, pH, DO (Dissolved Oxygen), temperature of nutrient reservoirs,
- Measure and record Vapor pressure deficit.
- Measure and record temperature/ humidity in all relevant parts of the room.
- Measure and record status of electrical systems including light intensity and equipment operating temperature.
- Measure and record status of irrigation systems, including pumps, drip emitters, pipes, and connections.
- Measure and record signs of distress that might indicate the presence of a problem such as a nutrient deficiency, pH imbalance, pests, or a disease.
- Measure and record sap sugar content with a Cardy EC meter.
- Measure and record pH of sap with Cardy ph meter.
- Measure and record Chlorophyll production at the leaf site.
- Observe and record insects caught in sticky traps or seen around plant.
- Morning meetings/Qi Gong exercises

Daily Routine – After Lunch

Starting Rooms

- Mothers – Feeding, maintenance, harvest clones
- Clones – Feeding, maintenance, transplant into 4”pots.
- Seedlings – Feeding, maintenance, transplant into coco slabs in finishing room or 3 gallon coco-coir filled pot in the Mother room.

Finishing Rooms

- Coco Slabs – Feeding, maintenance, harvest

Trimming Area

- Harvested Plants – Machine trimming, maintenance

Drying Rooms

- Trimmed Buds – Rack drying, maintenance, curing.

Extraction Room (to come)

Daily Routine -End of Day

- **Environmental Inspection of each room:** , Go to assigned area and record the environmental conditions of each room. If adjustments are needed, consult the Lead Grower or their representative on staff for environmental control for guidance. DO NOT ADJUST any environmental conditions without the Lead Grower or their representative present.
- Room inspections must be divided and alternated between grow teams on shift, ensuring that no one inspects the same room two days in a row.
- Measure and record status of nutrient reservoirs, including PPM/EC, pH, DO (Dissolved Oxygen), temperature of nutrient reservoirs,
- Measure and record Vapor pressure deficit
- Measure and record temperature/ humidity in all relevant parts of the room.
- Measure and record status of electrical systems systems including light intensity and equipment operating temperature.
- Measure and record status of irrigation systems, including pumps, drip emitters, pipes, and connections.
- Measure and record signs of distress that might indicate the presence of a problem such as a nutrient deficiency, pH imbalance, pests, or a disease.
- Measure and record sap sugar content with a Cardy EC meter.
- Measure and record pH of sap with Cardy ph meter.
- Measure and record Chlorophyll production at the leaf site.
- Observe and record insects caught in sticky traps or seen around plant.
- Morning meetings/Qi Gong exercises

Restocking

- First Aid/Antiseptic stations
- Cloning rooms
- Extraction rooms
- Drying/Curing rooms
- Packaging rooms
- Break rooms
- Locker rooms
- Bathrooms
- Supply closets
- Water treatment areas
- Equipment storage rooms

- Equipment cleaning rooms

Cleaning

Properly cleaned facilities and equipment are the first line of defense against pest, diseases, and other adulterants that could adversely impact crop yield, quality, or consistency.

Materials

Hydrogen Peroxide (3% solution)
Coarse bristle brush
Designated work clothes and gloves
Soft bristle brush
Steel wool and green scrubbers
Mop buckets
Approved detergents
Vacuum

- Vacuum all spaces at least once weekly and many cases daily
- Scour all work surfaces
- Surfaces disinfected
- Equipment washed, dried and if necessary sanitized
- Harvested room cleanout (if required)
- Refuse removed to dumpster
- General janitorial duties (mopping floors, cleaning sinks, etc.)

Security

- All rooms locked as required.

Exiting the Building

- **Grow area exit:** Never exit the grow area unless you first notify security or management. When exiting at the end of the shift, check back in at the security desk, they will take your Personal ID. Punch out on the time clock located across from the security desk.
- **Change into personal clothes:** Proceed directly to the locker room and change into personal clothing, being careful not to keep work clothes the locker you store your personal clothing in.
- **Check out with security**: Upon leaving the facility, check out at the security desk and sign-out. Leave the building immediately.

ITEM SPECIFIC GROW MEMBER TRAINING

All staff must complete the tutorials on Canna Coco medium/nutrients provided on the company website prior to working in the growing area. All associate growers will work in teams of two under the direct oversight of the Lead Grower on shift. Grow associates may not perform any functions in the PharmaFarm facility unless properly trained and certified by a Lead Grower. The following procedures are considered to be the intellectual property of the PharmaFarm facility and may not be shared, discussed, or otherwise disclosed to individuals who are not employed at the PharmaFarm facility.

Always follow the instructions included with each piece of equipment unless specifically informed otherwise by a Lead Grower!

Filling the Reservoir
Materials

Canna Coco A
Canna Coco B
Cannazyme
CannaBoost
P/K 13/14
Rhizotonic
100 Gallon nutrient reservoir
Plastic nutrient measuring cup
Stainless steel wheeled work cart
Designated work uniform and gloves.

Procedure

- Assemble all required materials on a stainless steel work cart and wheel the cart to the nutrient reservoirs.
- Disinfect hands and put on gloves.
- Measure and record the existing nutrient reservoir and record all relevant data including age, strength, pH, and quantity remaining.
- Consult the nutrient application chart, which is posted up at every nutrient feeding station and the back of this handbook, to determine an appropriate strength (very light, light, medium, or heavy) nutrient solution for whatever phase of growth that room is in.
- Modify the nutrient reservoir, if needed, to match the requirements called for on the nutrient application chart by using pH Up, pH Down, and purified water. **If the nutrient reservoir is below the 1/4 full mark or over 1 week old, drain the tank completely and follow the remaining steps.**
- Fill the tank approximately 1/4 of the way with plain water.
- Add nutrients to the tank in the order and quantities specified by the nutrient application chart for a 100 Gallon container.
- Fill the 100 Gallon container the rest of the way with purified water.
- Wait 30 minutes, then check the PPM and pH of the solution, adding pH Up or Down and purified water until the solution meets the requirements specified in the nutrient chart.
- Return all materials to their proper places, throw away all trash, and put all used equipment in the Equipment Cleaning Room.
- Record all data and changes on the computer in the format specified under the standard operating protocol for "Data Entry".

Environmental Control
Materials

Infra-red thermometer

Designated work clothes and gloves
Portable hygrometer

Procedure

- Disinfect hands and put on latex gloves
- Using the infra-red thermometer and the portable hygrometer, record the temperature and humidity of all relevant surfaces of the room (i.e. walls, floors, lights, medium, water reservoir, CO2 tank, etc.).
- Compare the current temperature and humidity readings with the past month of temperature readings in the room.
- If significant temperature or humidity variance is detected in any area of the grow room, alert a Lead Grower immediately; rapid temperature fluctuation can indicate a problem with grow room equipment and/or HVAC systems.

Measuring Coco Nutrient Levels

Materials

Portable pH/PPM meter
Designated uniform and gloves
Core sampler
250 ml beaker
500 ml beaker
Cheesecloth
Disposable rubber band

Procedure

- Assemble all required materials on a stainless steel work cart and wheel the cart to the appropriate area.
- Disinfect hands and put on gloves.
- Take a sample of coco from the slab or pot with the core sampler from 3 different points.
- Collect the sample in a bowl and determine whether it contains the right amount of moisture. The coco has the right amount of moisture if moisture disappear between your fingers when you squeeze it. Add pure water if necessary and mix the coco.
- Take a 250 ml measuring beaker and fill it with 150 ml of pure water. Add coco to the 250 ml mark. Fully mix and allow the slurry to settle for at least two hours.
- Mix again and record the pH using a portable pH meter.
- Filter the material through a cheesecloth affixed by a rubber band over a 500 ml beaker.
- Record the PPM of the solution in the 500 ml beaker
- Return all materials to their proper places, throw away all trash, and put all used equipment in the Equipment Cleaning Room.
- Record all data and any changes on the computer in the format specified under the standard operating protocol for "Data Entry".

Cloning

Everything must be sterilized with the utmost care! Read instructions completely before beginning. Only use one strain per cloner!

Materials

Micro-pruning shears
Rooting gel in a disposable cup
Designated work uniform with gloves
Box cutter with new razor blade
1 Gal. plastic pitcher
Label Maker/RFID Printer
60-site aeroponic cloners
Light nutrient solution
Stainless steel wheeled work cart

Procedures

- Reduce Nitrogen supply to expected Mothers and notify lead grower a week prior to cloning date.
- Assemble all required materials on a stainless steel work cart and wheel the cart to the starting room.
- Disinfect hands and put on gloves.
- Fill plastic pitcher with ½ gallon water.
- Label the front of the aeroponic cloner with the name of the strain to be cloned using the label-maker. Create RFID tag.
- Using the shears, cut branches of the mother plant into sixty uniform 6" cuttings, taking care to leave at least two sets of leaves on each cutting.
- Put the cuttings into the plastic pitcher immediately after removing them from the mother plant, ensuring that the cut ends are fully submerged.
- Fill the aeroponic cloner with a light base nutrient solution (2ml/gal), then test the solution for pH and PPM, adjusting until they are approximately 6.0 and 250 respectively.
- Lay one of the cuttings on a flat surface and, using the razor blade, make a single slice along the bottom 1" of the cutting, removing a small portion of the epidermis on one side.
- Dip the newly-exposed area of the cutting into the cup of rooting gel
- Wrap a foam cuff around the cutting just above the area that was dipped in the rooting gel.
- Insert the foam cuff and cutting into one of the slots on top of the aeroponic cloner.
- Continue slicing, dipping, and inserting clones until the entire cloner is filled with cuttings.
- Place the aeroponic cloner in the "Clone" area under small florescent lights.
- Plug the power cord into a nearby outlet
- Examine the aeroponic cloner to ensure it is working properly leaks, non-working sprayers, pump problems, etc.

- Enter the relevant data into the tracking system
- Return all materials to their proper places, throw away all trash, and put all used equipment in the Equipment Cleaning Room.
- Record all data and changes on the computer in the format specified under the standard operating protocol for "Data Entry".

Transplant To Disposable Cups

Materials

Disposable Cups
Expanded coco
Light nutrient solution
Label-Maker
Latex gloves
5 Gallon bucket
Designated work uniform and gloves
Mighty Wash
Power Wash
Stainless steel wheeled work cart

Procedure

- Assemble all required materials on a stainless steel work cart and wheel the cart to the starting room.
- Unplug the machine after cuttings have spent 14 days in the cloner.
- Drain any remaining nutrient solution by placing a 5 gallon bucket by opening the release valve on the side of the cloner. Close the valve when finished.
- Fill the cloner base with Mighty Wash, flip the top of the cloner upside down, and place it on top of the cloner base, fully submerging the clones in the solution for 5 seconds.
- Drain the Mighty wash into the 5 gallon bucket by opening the release valve on the side of cloner.
- Flip the top of the cloner to its proper position and spray the clones with Power Wash.
- Disinfect hands and put on gloves.
- Fill a disposable cup 3/4 of the way up with loosely packed coco for each clone to be transplanted.
- Using your index finger, make a small hole in the coco approximately 3" deep with a 3" radius.
- Grasp a cutting gently by the stem, and remove the cutting with the cuff still attached from the cloner.
- Carefully remove the cuff from the cutting, taking care not to damage any roots, and hold the cutting in one hand.
- Gently place the cutting into the hole you made with your finger in the coco and fill the container the rest of the way up with coco.
- Print out a label designating the strain and date of transplant from the

label maker and affix it to the container.
- Place the newly transplanted clone on a seedling table directly underneath a florescent light.
- Continue transplanting clones until they have all been transplanted.
- Remove the gloves, return equipment to its proper place, and place all used equipment in the Equipment Cleaning Room to be cleaned at the end of the day.
- Record all data and changes on the computer in the format specified under the standard operating protocol for "Data Entry".

Mother Plants
Materials
3 Gallon grow bags
Light nutrient solution
Expanded loose coco
Designated work uniform and gloves
Label Maker
Mighty Wash
Power Wash
5 Gallon bucket
Spray bottle
TangleSap
Stainless steel wheeled work cart
Procedure
- Assemble all required materials on a stainless steel work cart and wheel the cart to the starting room.
- Disinfect hands and put on latex gloves
- Select 5 rooted seedlings of the same strain that have been in disposable cups for at least 2 weeks and move to a space on the Mother table under an open light.
- Fill a 5 gallon bucket with Mighty Wash and submerge a seedling fully in the solution for at least 5 seconds, holding the seedling in place with one hand and the cup with the other. Repeat for each of the 5 seedlings.
- Fill the spray bottle with Power Wash and saturate the seedlings with the solution.
- Open a grow bag next to the seedling you intend on transplanting and fill it 1/3 of the way up with coco.
- Holding the coco in place with one hand, use your other hand to gently free the root mass from the disposable cup.
- Holding the root mass in place with both hands, gently place the seedling in the middle of the grow bag and fill the rest of the way up with coco.
- Apply TangleSap around the base of the stem.
- Repeat the previous three steps until all seedlings have been transplanted.

- Place a drip emitter in the grow bag of each new transplant and turn on the irrigation system to that Mother table.
- Introduce predatory insects to those 5 plants, following the instructions on each insect container.
- Record all data and changes on the computer in the format specified under the standard operating protocol for "Data Entry".

Aerated Compost Tea

Materials

Compost tea brewer
Worm casting
Oreganism Mychorizzae
Blackstrap Molasses
Fish emulsion
Pure water
Designated work uniform and gloves
Paint strainer
5 Gallon bucket
Adjustable 4' Zip tie
Stainless steel wheeled work cart

Procedure

- Assemble all required materials on a stainless steel work cart and wheel the cart to the work area.
- Disinfect hands and put on gloves.
- Fill compost tea brewer halfway up with pure water.
- Add a cup of worm castings.
- Add a tablespoon of Oreganism
- Add a tablespoon of Molasses
- Add a tablespoon of fish emulsion
- Fill the brewer up the rest of the way with water.
- Activate the brewer.
- 48 hours later, the ACT is ready to use.
- Secure the paint strainer around the bucket with the zip tie.
- Open the drain spout and allow the ACT to pour through the paint strainer in to the bucket. Discard the solids caught in the strainer and the strainer itself once the brewer is empty.
- Apply 30 ml to every nutrient tank; do not store, use immediately!
- Remove the gloves, return equipment to its proper place, and place all used equipment in the Equipment Cleaning Room to be cleaned at the end of the day.
- Record all data and changes on the computer in the format specified under the standard operating protocol for "Data Entry".

Filling Coco Slabs

Materials
Designated work uniform and gloves
Coco slabs
Black plastic cement mixing tub
Light nutrient solution
5 gallon bucket
Box cutter
TangleSap
Sulfur burner
Sulfur pastilles
Electrical timer
Mighty Wash
Power Wash
Stainless steel wheeled work cart

Procedure

- Assemble all required materials on a stainless steel work cart and wheel the cart to the cloning station.
- Disinfect hands and put on latex gloves.
- Fill a 5 gallon bucket with Mighty Wash solution.
- Pick up a seedling to be transplanted with one hand, and hold the coco in place with the other.
- Flip the seedling upside down and submerge it in the Mighty Wash solution for 5 seconds before returning it to its original position.
- Repeat the last two steps until all seedlings to be transplanted have been submerged in Mighty Wash.
- Spray those seedlings with Power Wash once the Mighty Wash has dried.
- Expand a coco slab for every 5 clones to be transplanted by submerging the slabs in cement mixing tubs filled with a light nutrient solution.
- After the slabs have soaked for 1 hour, place the slabs on a wheeled cart and take them to the finishing room tables, making 5 X-shaped openings equidistant from each other along the top of each slab with a box cutter.
- Make a hole in the coco exposed by each X-shaped opening large enough to accommodate the entire root mass of the seedlings to be transplanted.
- Take the empty cart back to the seedling area. Gently place seedlings in the cart until it is full, careful not to overfill the cart, and wheel it to the proper finishing room alongside an empty table.
- Carefully turn a seedling container upside down, holding the plant in place with one hand while gently pulling away the container with the other.
- Using both hands, turn the plant upright and slide it into the hole you created in the coco beneath the X-shaped opening, taking care to keep the roots fully submerged in the coco.
- Apply Tanglesap around the base of the stem.
- Repeat the last three steps until all seedlings have been transplanted.
- Position a drip emitter at each X-shaped opening.

- Fill the nutrient reservoir for the room 1/4 of the way full with pure water, then add nutrients in amounts and order specified on the Nutrient Feeding Chart. Add back pure water until the desired concentration is reached, then adjust the pH using pH Up or Down. (**Follow The Directions On The Bottles!)**
- Return all materials to their proper places, throw away all trash, pour liquid waste into the slop sink, and put all used equipment in the Equipment Cleaning Room.
- Hang the sulfur burner from a hook in the center of the room, fill it with two grams of sulfur, plug it into a socket with an electrical timer, and set it to run for 4 hours during the dark cycle.
- Once the sulfur burning has completed and the lights have turned back on, turn on the ventilation fan for the room for 30 minutes before returning the sulfur burner to its proper storage area.
- Turn on CO2 augmentation device.
- Remove the gloves, return equipment to its proper place, and place all used equipment in the Equipment Cleaning Room to be cleaned at the end of the day.
- Record all data and changes on the computer in the format specified under the standard operating protocol for "Data Entry".

Harvesting/Drying

Materials

Small pruning shears
Large pruning shears
Label Maker
USB magnifying camera
Digital camera
Designated work uniform and gloves
Paper face mask
Harvest trays
Stainless steel wheeled work cart
Rack Dolly

Procedure

- On the 42nd day of flowering, turn off CO2 augmentation.
- Assemble all required materials on a stainless steel work cart and wheel the cart to the finishing room.
- On the 56th day of flowering, take photographs of the plant using the digital camera and store them in the computer along with your written observations.
- Disinfect hands and put on gloves.
- Using the pruning shears, remove a small amount (less than 1 gram) of plant material from buds at different stages of growth and different areas of the table; at least 2 but no more than 5 samples from each table.
- Package and label each sample in its own small plastic container.

- Take pictures of each sample using the USB microscope and record the data on the computer.
- Speak to the Lead Grower on shift about the data, who will make the final decision as to whether to harvest or to let continue flowering. If the lead grower decides not to harvest, wait 3 days, then repeat steps 1-6. Repeat as needed
- If the lead grower decides to harvest, then cut each plant at the base with the large pruning shears (**ABOVE THE STRIP OF TANGLESAP AROUND THE BASE!)** and place them gently in the harvest trays by strain with RFID tags.
- Once each tray is full, load onto rack dolly and wheel the trays to the trimming room and follow the standard operating procedures for trimming with the machine trimmer. Keep RFID tags with correct material at all times.
- Load all finished plant material back onto harvest trays on rack dolly with RFID tags and wheel the finished material into the drying rooms.
- Gently spread the plant material across the screens, ensuring uniform airflow around each trimmed bud.
- Empty the material left in the trimming machine into stainless steel bins, to be placed in a wheeled cart and emptied across smaller screens in the drying area designated for drying trimmed material.
- Record the strain name and plant count present in each drying room on information sheet affixed to the outer door of that room.
- Return all materials to their proper places, clean out the irrigation system, throw away all trash, and put all used equipment in the Equipment Cleaning Room.
- Carefully clean every available surface remaining in the room with 3% Hydrogen Peroxide, appropriate PPE, and other necessary cleaning equipment (mops, brooms, brushes, etc.) available in the Equipment Cleaning Room.
- Record all data and changes on the computer in the format specified under the standard operating protocol for "Data Entry"

3). MANUFACTURING AND PACKAGING TRAINING

(This section is to be completed once our Research and Development member Rose Habib is on board.)

PharmaFarm Presenter's: Rose Habib, Research and Development
Michael Nevas, Lead Grower
David Kimmel, General Manager

Manufacturing set-up protocol.
Manufacturing operational protocol based on product and delivery system.
Manufacturing break-down protocol.

4). MONTHLY REFRESHER TRAINING

Refresher training classes will be held monthly. Each class will have a specific focus and that will dictate who the trainer is;

- Code of Ethics
- Substance Abuse
- Security
- Hazard Material Handling
- Sanitation
- Employee Handbook Specifics as Needed
- Entering and Exiting the Facility
- Entering and Exiting the Grow Area
- Fire Prevention and Evacuation Procedures
- Mold, Bacteria and Mildew Awareness
- Spider Mite Awareness
- Good Manufacturing Practices

The above refresher training programs will be in addition to specific grow, manufacturing and packaging refresher programs.

5). On-Going Continuing Educational (CE) Programming

Continuing education will be available to all senior management, grow and manufacturing team members

- Industry tradeshows in the U.S. and internationally (Seattle, Denver, Vancouver, Holland)
- Medical programs for disease specific treatments, the endocannibinoid system and other cannabis-related patient oriented lectures, programs, seminars, workshops or other
- An international exchange program to work in other grow facilities to study cannabis agricultural techniques and processes (Canada and Israel)
- On-site 10 day study programs with other producers in the U.S.
- Guest speakers for in-house presentations on cutting-edge cannabis growing information and applications. (vendors, growers, lab specialists, other)
- Physician presentations on patient response and feedback.
- 1-Day retreat for Grow and Manufacturing team for ideation, brainstorming and team building.
- Trade magazines for reading in the break area.
- Video presentations in the break room on technique, trend and new industry developments.
- Dispensary guest speakers to understand the dispensary model, the patients and how to best service the needs of both.

DRIVER TRANSPORT TRAINING
See SECTION H. Marijuana Transport

CANNABIS DISPOSAL TRAINING
See Sub-Section C.2.e. Cannabis Disposal Procedure for training guide.

SECTION C. PROPOSED BUSINESS PLAN
Sub-Section C.2.d Standard Operating Procedure Worksheet

Below is the PharmaFarm outline used for developing Standard Operating Procedures for the on-going development of operational requirements. A

Answer all of the questions with as much detail as possible. If a question does not apply to your procedure, please specify "N/A." Please attach additional pages if required.

1. PURPOSE
Why do we need this procedure and what is to be accomplished?

_____
_____
_____

2. SCOPE
To what areas will this procedure be applied?

_____
_____
_____
_____

3. REFERENCES

What documents are related to this procedure?

_____
_____
_____
_____
_____

4. DEFINITIONS

Are there any words that require defining (acronyms, scientific terms, technical language)?

_____
_____
_____
_____

5. RESPONSIBILITY

Who will be held accountable for this procedure, directly or shared?

_____
_____
_____
_____

6. PROCEDURES

How will the procedure be done? Please list in order of completion and assign a number to each task.

_____
_____
_____
_____
_____
_____
_____

_____
_____
_____
_____

7. VERIFICATION PROCEDURES
How will the effectiveness of this procedure be verified?

_____
_____
_____
_____
_____
_____
_____

SECTION C. PROPOSED BUSINESS PLAN
Sub-Section C.2.d Employee Training Log

Training Subject:_____
Date/Time: ____/_____/_____/ _____ _____
(Start Time) (Finish Time)
Trainer:_____
(Print Name) (Signature)

Training Materials (Please attach a copy of any printed materials used or distributed in the training program to this log.)

Employee Name (please print)	**Employee Signature**
1._____	_____
2._____	_____
3._____	_____
4._____	_____
5._____	_____

6._____ _____

7._____ _____

8._____ _____

9._____ _____

10._____ _____

11._____ _____

12._____ _____

13._____ _____

14._____ _____

15._____ _____

16._____ _____

17._____ _____

18. _____ _____

19. _____ _____

Comments:

_____

_____

RETURN THIS FORM TO THE BOOKKEEPER WHEN COMPLETED

SECTION C. PROPOSED BUSINESS PLAN
Sub-Section C.2.d. Natural Disaster Training Hand-out

NATURAL DISASTERS AWARENESS TRAINING

TORNADO ACTIVITY

Wallingford-area historical tornado activity is slightly above the Connecticut state average. It is 2% greater than the overall U.S. average.

On 7/10/1989, a category F4 (maximum wind speeds of 207-260 mph) tornado 6.9 miles away from the Wallingford town center, injured 40 people and caused between $50,000,000 and 500,000,000 in damages.

On 10.3/1979, a category F4 tornado 30.2 miles away from the Wallingford town center, killed 3 people and injured 500 people and caused similar damages as above.

EARTHQUAKE ACTIVITY

Wallingford-area historical earthquake activity is near the Connecticut state average. It is 90% smaller than the overall U.S. average.

On 10/2/1994 at 11:27AM a magnitude 3.7 earthquake occurred 67.5 miles from the center of town.
On 6/16/2000 at 4:02AM a magnitude 3.3 earthquake occurred 44.4 miles from the town center.
On 10/2/1994 at 2:36PM. a magnitude 3.3 earthquake occurred 69.6 miles from the center of town.
On 10/28/1991 at 8:58PM. a magnitude 3.0 earthquake occurred 47.8 miles from the center of town.
On 3/22/1996 at 8:22PM, a magnitude 3.1 earthquake occurred 83.1 miles from the center of town.

NATURAL DISASTERS

Number of natural disasters in New Haven County - 17
U.S. average – 12

Causes of Natural Disasters
Floods Storms Hurricanes Snows Snowstorms
Blizzards Tornado Wind Storm Ice Storm
Major Disasters (Presidential) Declared -10

SECTION C. PROPOSED BUSINESS PLAN
Sub-Section C. 2.e. Processes or Controls to Prevent Diversion, Theft or Loss

In addition to the requirements specified in Sec. 21a-408-24 Licenses ….For Production Facility Employees, Sec 21a-408-54 Producer Record keeping Sec.21a-408-61, Security Requirements for Producers and Sec.21a-408-62, Security Alarm Systems; Minimum Requirements for……Production Facilities, PharmaFarm will utilize;

- On-site security guards during normal business operational hours.
- Controlled access into and out of the grow area, facility and parking area.
- Controlled security parking gate with camera.
- A physical facility layout design to control workflow with one central access point from the employee area to the grow area with the security station positioned between both and the exterior entrance area corridor.
- RFID tracking system following each plant from seedling to distribution point with external support for all electronic recording keeping data.

- Physical inventory taken weekly by two associates, one always being senior management to support and verify electronic record keeping.
  To Include:
  - a). The brand name, kind and quantity
  - b). Date of production
  - c). Record of all sold, transported or disposed cannabis materials
  - d). Date, time and transport of disposed cannabis materials
  - e). Name and address of dispensary to which cannabis is sold
  - f). The name of the facility employee making cannabis transport
- Key bank security system to secure, track and monitor all key use by user and limiting key accessibility to only those authorized.
- Pocket-less lab coat uniforms.
- A two-person work teams, frequently rotated by employee mix.
- A no package, purse or bag policy in the employee facility area without inspection by security.
- Chain link fencing to secure the perimeter of the building property.
- A management inspection program for all refuse being removed from the facility.
- A no-food delivery policy to the facility.
- Our own in-house laundry to eliminate the movement of uniforms in and out of the facility.
- Locked exterior garbage dumpsters.
- Roof camera, bared windows and razor wire as required.

SECTION C. PROPOSED BUSINESS PLAN
Sub-Section C.2.e Recall Form

PHARMAFARM RECALL FORM

File Start Date:_____
Filed By:
_____/_____
(Print name) (Signature)

Step 1 (by Filer at time of first contact)
PRODUCT INFORMATION
Brand: _____
Lot#:_____ Batch#_____ Serial #_____
Reason: _____
_____
Amount:_____ Description: _____
Dispensary: _____ Contact: _____
(Print Name) (Print Name)
Phone: _____ Date: _____ Time:_____

DCP NOTIFICATION:
Call Date:_____ Time: _____ Sent Date: _____
DCP Contact: _____
(Print Name)

Step 2 (by Driver at time of pick-up)
PICK-UP INFORMATION
Dispensary: _____ Pick-up Date:_____/_____/____
Amount: _____ Description: _____
Lot#: _____ Batch#_____ Serial#_____
Picked-Up By: _____
(Print Name) (Signature)
Released By: _____
(Print Name) (Title)
_____
(Signature) (DCP ID #

Step 3 (by Management at time of disposal)
DISPOSAL INFORMATION
Date of Disposal:_____/_____/_____Time: _____ Digital Photo: _____Y _____N
Brand Name: _____
Lot#:_____ Batch#_____ Serial#:_____
Amount:_____ Description _____
PharmaFarm:_____ _____
(Print Name) (Signature)
Other:_____ _____
(Print Name) (Signature)
Other:_____ _____
(Print Name) (Signature)

DCP:_____ _____
(Print Name) (Signature)

This form must be returned to the bookkeeper upon completion

PHARMAFARM RECALL FOLLOW-UP FORM

Original Recall Date: _____ Serial#_____
Brand Name:_____
Lot#: _____ Batch#:_____
Initial Reason:_____
_____

1. Why was there a recall? (E.g., What was the source of the problem?)
_____
_____
_____
_____

2. What corrective action(s) was/were taken? *(List and describe)*

_____

_____

_____

_____

3. What ongoing procedures have been put in place to prevent the recurrence of the problem?

_____

_____

_____

_____

4. Identify the person(s) responsible for ensuring the above actions and procedures are monitored and implemented.

_____

_____

5. Any reported patient issues?

_____

_____

_____

***Confirmation Signature:*_____ *Date:* _____**

Section C. PROPOSED BUSINESS PLAN
Sub-Section C.2.e
Cannabis Disposal Procedure

All cannabis products slated for disposal must be maintained separately and securely, tracked and accounted for prior to disposal. This includes products that are;

- Waste materials legally defined as Marijuana under CT law.
- Recalled materials
- Out of expiry materials
- Material rejected by the Department of Consumer Protection approved lab
- Poor or inferior quality material
- Misbranded material
- Undesired excess material
- Contaminated or infested material

Disposal Procedures

- All cannabis material scheduled for disposal must at all times be kept in a segregated and secured vault area until authorized for disposal.
- A disposal process may not occur without AN AUTHORIZED REPRESENTATIVE FROM THE DEPARTMENT OF CONSUMER PROTECTION PRESENT DURING ACTUAL DISPOSAL.
- A separate record for each disposal must be maintained in file to include;
    a. Registered Brand Name
    b. Amount
    c. Date and time of disposal
    d. Method of disposal
    e. Lot/Batch Number
    f. Serial ID Number
    g. Printed name and signature of those present for the disposal;
        - Authorized DCP representative
        - PharmaFarm manager
        - Any other persons present during the disposal process

Whole Plant Material

- When authorized to dispose, in a large stainless steel bowl, plastic bag or 55 gallon garbage can, physically breakup and shred the cannabis material to a significant degree as deemed acceptable to the DCP representative.
- Moisten the cannabis material thoroughly with warm water and drain if necessary so little if no water remains in the container.
- Coat all the cannabis heavily and completely with kosher salt or dirt.
- Mix thoroughly to be sure it is well blended.
- Allow to dry and then bag for disposal. (Disposal to dumpster will be management approved.)
- Disposal form completed and returned to the bookkeeper.

Concentrates and Extracts

- When authorized to dispose, in a large stainless steel bowl, plastic bag or 55 gallon garbage can and empty all contents into the container.
- Capsules must be crushed or contents other wise separated from the capsule itself.
- Oils or other extracts, if necessary must be removed from their packaging to expose their contents and emptied into the intended disposal container.
- Coat all the cannabis materials heavily and completely with kosher salt or dirt.
- Mix to insure it is well blended.
- Allow to dry and bag for disposal. (Disposal to dumpster will be management approved.)
- Remove empty containers and soak in hot soapy water. Scrub if required.
- Dispose of empty containers properly, do not reuse.
- All recyclable materials are to separated and handled accordingly.

- Disposal form completed and returned to the bookkeeper.

Topical Products

- When authorized to dispose, in a large stainless steel bowl, plastic bag or 55 gallon garbage can and empty contents into the container.
- Coat all the cannabis materials heavily and completely with kosher salt or dirt.
- Mix well and thoroughly blended.
- Allow to dry and bag for disposal. (Disposal to dumpster will be management approved.)
- Take empty containers and soak in hot soapy water.
- Dispose of containers properly, do not reuse.
- All recyclable materials are to separated and handled accordingly.
- Disposal form completed and returned to the bookkeeper.

STALKS (and ROOTS)

Section 21a-240 of the Connecticut General Statutes states that stalks are not considered cannabis/marijuana. All stalks discarded must be completely free of any leaf or flower material and may not be discarded without authorization and inspection by senior management. Root material will be saved for research and development and will be stored in the vault area.

No refuse or garbage is removed from the building without senior management or security present.

- **All refuse bags must be inspected prior to removal from the building.**
- **The dumpster must be unlocked and locked after dumping refuse.**

SECTION C. PROPOSED BUSINESS PLAN
Sub-Section C.2.e Disposal Form

PHARMAFARM DISPOSAL FORM

PRODUCT INFORMATION

Brand Name: _____

Lot#:_____ Batch#:_____ Serial# _____

Reason: _____

_____

_____

_____

Amount:_____ Description: _____

Amount:_____ Description: _____

Amount:_____ Description: _____

Amount:_____ Description: _____

DISPOSAL INFORMATION

Date of Disposal:_____/_____/_____ Time: _____ Digital Photo: _____Y _____N

Methodology: _____ Salt _____ Dirt _____ Other (Describe)_____

PharmaFarm: _____
(Print Name) Title (Signature)

Other: _____
(Print Name) Title (Signature)

Other: _____
(Print Name) Title (Signature)

DCP : _____
(Print Name) Title (Signature)

RETURN THIS FORM TO BOOKKEEPER UPON COMPLETION OF THIS FORM

SECTION C. PROPOSED BUSINESS PLAN
Sub-Section C.2.e. - Security Associate Job Description

QUALIFICATIONS

- State of Connecticut approved Security Officer with State Identification Card.
- Experience in the securing and handling of large amounts of cash.
- CT Driver's License with clean driving record required.
- Able to move quickly and in good physical condition.
- Excellent verbal, written, and interpersonal communication skills.
- Five years security experience or law enforcement experience.

DUTIES

- Knowledge of PharmaFarm safety, health and security protocols
- Assist in the transport of cannabis deliveries to dispensaries. (See

Section H. Marijuana Transport.)

- Follow and maintain Facility Accessibility (see Sub-section C.2.b.)
- Professionally manage any security situation within PharmaFarm that is deemed by management as requiring security interdiction.
- With General Manager and/or lead grower, check all security systems twice daily to insure they are in good working order.
- Develop a solid working relationship with local law enforcement officials and fire department officials.
- Immediately contact local law enforcement or other emergency services as required by management or when immediate action is required.
- Monitor camera images and facility for signs of diversion or theft.
- Inspect all packages entering and exiting the building as required by PharmaFarm policy.
- Maintain a security presence on the loading dock while the vehicle is being loaded or unloaded.
- Communicate immediately with the General Manager, Grower and Office Manager in the event of any emergency.
- Work with outside the security company for programming, service and other facility requirements.
- Able to open and close the facility as needed as it relates to all security system programming requirements.
- Foresee and identify security weaknesses and report to the General Manager.
- Able to be reached by company cell phone in the event of an emergency.

Other Helpful Qualifications and Experience

- Ability to handle multiple tasks and organized.
- Operates calmly and evenly under stress.
- Law enforcement background, local police background.

SECTION C. PROPOSED BUSINESS PLAN
Sub-Section C. 2.e. Vault Procedures For Theft Protection

Three elements are usually needed for the theft of cannabis to occur; Opportunity, Pressure and the individual's Rationalization of a situation.

Opportunity:	Circumstances exist like the absence of controls, ineffective controls or the ability for management to override controls that provide an opportunity for fraud to be perpetrated.
Pressure:	Management or other employees may have an incentive or be under pressure, which provides a motivation for fraud.
Rationalization:	Those involved in a fraud are able to rationalize a fraudulent act as being consistent with their personal code of ethics. Some individuals possess an attitude, character

or set of ethical values that allow them to knowingly and intentionally commit a dishonest act.

The PharmaFarm storage vault as part of and in addition to Sec21a-408-61 Security, Sec.21a-408-62 Security Alarm Systems, requirements for producers, will;

- Hold finished product organized by labeled by brand, delivery system, expiration date and RFID tag.
- Hold bulk dried and cured flower material for further processing in sealed, nitrogen flushed bags with lot, batch and RFID tag.
- Hold material to be destroyed in a separate and secure area with RFID tag.
- A physical and electronic vault inventory will be taken weekly.
- Senior management and at least one additional employee must be present when taking inventory.
- Inventory taker's must be rotated weekly by management and employee.
- Each time product is added to or removed from the vault, it must be done so with senior management present.
- Product added to or removed from the vault must be logged manually on the vault log sheet and electronically by RFID scan. Signatures are always required for this process.
- Vault entry and exit must be logged on the vault log sheet.
- Bait material will be used periodically as part of inventory counts.
- Only senior management will have vault access by combination and protocol.

MANDATORY REVIEW OF OVERAGES/SHORTAGES

- A written procedure will be put into place for the prompt reporting and investigating of shortages (and overages) when they become know.
- Senior management will have the responsibility of reviewing all details for shortages, recurring patterns or other unusual items.
- Senior management will have the responsibility to ensure shortages have been properly investigated and resolved.
- Senior management will notify the Drug Control Division of the DCP by the next business day and notify the local enforcement authorities.
- Shortage notification to the Drug Control Division must be done by way of a signed statement detailing event circumstances, inventory amount by brand and confirmation that local authorities were notified.

SECTION C. PROPOSED BUSINESS PLAN
Sub-Section C. 2.e VAULT LOG DRAFT

DATE	TIME IN/OUT	REASON	SIGNATURE
_____	____/____	_____	_____
_____	____/____	_____	_____
_____	____/____	_____	_____
_____	____/____	_____	_____
_____	____/____	_____	_____
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_____	____/____	_____	_____
_____	____/____	_____	_____

THIS FORM IS TO BE RETURNED TO THE BOOKKEEPER WHEN FULL

SECTION D. PROPOSED MARKETING PLAN

The Company's marketing and related programming will be focused on education. The educational information and programming presented will be targeted to the following groups;

- Registered patients and caregivers
- Registered physicians
- Dispensaries

The Company fully expects the educational process to be both evolving and on-going. Frequent updates will be required as the industry matures, as more research data becomes available and as the PharmaFarm products are further enhanced and improved for patient efficacy.

YEAR 1 Overview
During the first year of operation, the Company anticipates to market and promote the basic understanding of cannabis as medicine, the delivery system options available, dosing information, physician resources, nutritional support, patient self-care support and substance abuse support. (see Web Template.)

YEAR 2 and On-Going Overview
By Year 2 the Company projects to increase its online presence significantly in patient educational programming by integrating into the PharmFarm website patient webinar programs. These will include;

- Cooking classes
- Disease specific nutritional seminars
- Tai-chi and exercise classes
- Disease-specific guest speakers (support groups, disease associations and organizations, medical specialists)

YEAR 1
PATIENTS and CAREGIVERS
Patient and caregiver education will include and made available in the following formats;

CANNABIS MEDICATION and EDUCATION
Brochure and Website Button: **The ABC's of CT&F's**

- Definitions of cannabinoids, terpenoids and flavonoids
- Understanding which of these phytochemicals are known to help what state-specific symptoms
- The science behind cannabis and our body's endocannabinoid system

Brochure and Website Button: **Concentrates**

- Definition of PharmaFarm concentrates
- PharmaFarm concentrate product line specifications
- PharmaFarm packaging specifications (website only)
- PharmaFarm labels (website only)
- Concentrate delivery system options
- Concentrate dosing/potency guide by PharmaFarm product

Brochure and Website Button: **Whole Plant Flowers**

- Definition of PharmaFarm whole plant flowers
- PharmaFarm whole plant flower strain specifications
- PharmaFarm packaging specifications (website only)
- PharmaFarm labels (website only)
- Whole plant flower delivery system options
- Whole plant flower dosing/potency guide by PharmaFarm strain

Brochure and Website Button: **Culinary Oils**

- Definition of PharmaFarm culinary oils
- PharmaFarm culinary oil specifications
- PharmaFarm packaging specifications (website only)
- Pharma Farm labels (website only)
- Culinary oil uses by recipe development
- Culinary oil dosing/potency guide by PharmaFarm strain
- Recipes (website only)

Brochure and Website Button: **Skin Applications**

- Definitions PharmaFarm topical applications
- PharmaFarm topical product specifications
- PharmaFarm packaging specifications (website only)
- PharmaFarm labels (website only)
- Application technique and dose guide

Brochure and Website Button: **Medicated Lozenge (DCP permitting)**

- Definition of PharmaFarm medicated lozenges
- PharmaFarm lozenge product specifications
- PharmaFarm packaging specifications (website only)
- PharmaFarm labels (website only)
- PharmaFarm lozenge dosing/potency guide

Brochure and Website Button: **Capsules**

- Definition of PharmaFarm capsules
- PharmaFarm Capsule product specifications
- PharmaFarm packaging specifications (website only)
- PharmaFarm labels (website only)
- PharmaFarm capsule dosing/potency guide

OTHER EDUCATIONAL MARKETING and PROGRAMMING

Are You A Medication abUSER?

- PharmaFarms' Mary Von Ohlen, Substance Abuse Specialist counseling guidance (website)
- "Are You A Medication abUSER?," Roundtable discussions, free to patients, offered regionally

Tai-Chi For Health & Wellness

- PharmaFarms's Jeff Zimmerman, Eastern Energy Master
- "Tai-Chi for Health & Wellness" free to patients, offered regionally

Food is Medicine Too

- PharmaFarms' Steve Kushner, Nutritional Expert forum (website)
- Nutrition seminars free to patients, offered regionally

- Nutritional recipes for illness support (website)
- Cooking classes free offered regionally
- How to Read a Food Ingredient Label (hand-out and website)
- What to Eat When Your Ill (hand-out and website)
- Tips for Dining Out (hand-out and website)

PHYSICIANS and DISPENSARY'S

Physician and Dispensary educational marketing will include the same educational information being offered to the patients and caregivers as outlined above. Additionally more comprehensive medical information will be made available to both physicians and dispensary's.

There will also be a focused outreach to registered physicians by PharmaFarms' Marketing Director to assist them in accessing information that might be helpful in their understanding of medicinal cannabis, patient regiments, emerging science, clinical studies and clinical trials. This would include access to;

- a cannabis resource library of international clinic studies and clinic trials over the last 40 years.
- access to the most immediate and most comprehensive medicinal cannabis studies being conducted internationally as part of PharmaFarms' membership in the International Association of Cannabinoid Medicines.
- understanding the "entourage affect".
- focused education of dosing by product and delivery system.
- seminars by medical specialists for medical specialists.

Projected Guest Speaker List

Dr. Mark Ware, McGill University
Ethan Russo, GW Pharmaceuticals
Mor Cohen, Tikun Olam
Patient Roundtable Forum
Dispensary Roundtable Forum
Roundtable Forum with Industry Professionals

"HOW MUCH IS ENOUGH?" Dosing Hand-Out and Website Draft

FACTS & CONSIDERATIONS

- Medicinal cannabis products for sale in the state of Connecticut by law, list their active ingredients on each label.
- Oral ingestion of THC or cannabis has a significantly different effect than inhalation (smoking or vaporization.)
- Always take the "go slow" approach to start until you understand your personal titration level on any cannabis product.
- When taken orally, the onset of the action is delayed and titration of dosing can initially be more difficult in comparison to inhalation.

- Overdosing can cause disorientation, confusion, depersonalization, anxiety, a pounding heart and paranoia.
- A patient-determined, self-titrated dosing model in concert with your physicians' oversight and guidance is recommended.
- Remember that we are individuals and the medication brand as well as the amount can impact us all differently.
- PharmaFarm concentrated products deliver a high amount of medication to the patient and the dosing levels are significantly different than those of whole plant flower material used for inhalation.
- Consult your physician or dispensary on questions regarding dosing..

ORAL DOSING CONSIDERATIONS

Amount

- THC is orally active in the range of a few milligrams. That means it is easy for nearly any cannabis product to range in potency from mild to very strong.
- It is very important to understand the strength and potency of any given brand which is defined on the products' active ingredient label.
- Because expectations, tolerance, and reactions can vary dramatically from one person to the next, relying on someone else's description of potency is a recipe for disaster.
- With the guidance of your physician, establish an individual titration level of the cannabis medication that is best suited for you.
- When using a particular product and brand for the first time, begin with a very low dose (less than a quarter of the recommended dose).
- The likelihood of overdosing on orally cannabis is significantly increased if one has already high from smoked/vaporized cannabis.

Onset

- Once this initial dose is consumed, wait a minimum of 90 minutes on an empty stomach, or 120-150 minutes otherwise, before evaluating whether or not to consume another quarter of the physicians' total recommended dose.
- Depending on amount consumed, metabolism, and how recently a person has eaten, oral cannabis can take 30-120 minutes to initially be felt, and can last from three hours to more than 24 hours at very high doses. Duration increases with dose, so it's critical to wait to determine the effects of the medication before taking more.
- Patients should consider whether they have enough time and patience to establish the impact of a new product: with 90-120 minutes for the first check-in, it could be three to four hours before the desired level is reached, and then another three to six hours back to baseline. If there are time constraints, the more responsible choice is to not re-dose and just allow whatever effects to occur. If you don't have the time to be patient, perhaps it's not the right time to dose with concentrate cannabis oil.
- If supplementing with smoked or vaporized cannabis, wait a few minutes

between puffs. The underlying oral cannabis can in some cases, cause an unexpected acceleration of intensity.

CANNABIS DURATION - ORAL	
TOTAL DURATION:	4-10 hours
ON-SET:	30-120 minutes
COMING UP:	30-60 minutes
PLATEAU:	2-5 hours
COMING DOWN:	1-2 hours
POST EFFECTS:	6-12 hours
HANGOVER/DAY AFTER:	1-2 hours

VAPORIZATION and SMOKING DOSING CONSIDERATIONS

- A patient who chooses to dose with whole plant flower cannabis can titrate and regulate dose to obtain the desired acute effects and to minimize undesired effects.
- Each puff delivers a discrete dose of cannabinoids, terpenoids and flavonoids to the body.
- Puff and inhalation volume changes with phase of smoking, tending to be the highest at the beginning and lowest at the end of smoking, as example in smoking a cannabis cigarette.
- Thus, a patient-determined, self-titrated dosing model is suggested under the guidance of your physician. A self-titration model is usually acceptable given the above variables as well as the low toxicity of cannabis delivered in this system.
- This construct is not unique to cannabis as many other drugs have relatively low toxicity and high dosing ceilings and are titrated to effect.

CANNABIS DURATION – SMOKED	
TOTAL DURATION:	1-4 hours
ONSET:	0-10 minutes
COMING UP:	5-10 minutes
PLATEAU:	15-30 minutes
COMING DOWN:	45-180 minutes
POST AFFECTS:	2-24 hours
HANGOVER/DAY AFTER:	0-24 hours

DOSING CAUTIONS
Dosing Hand-out and Website Draft

Cannabis may have side-effects that are not necessarily therapeutic and can be mitigated through awareness:

ALCOHOL & DEPRESSANTS: Cannabis mixed with alcohol or other central nervous system depressants can cause the effects of each to be enhanced, and can lead to nausea and vomiting.
CARDIAC: Cannabis may cause temporary increases in heart rate coupled with

decreased blood pressure. This can cause temporary dizziness and orthostatic hypotension. If you have cardiac or blood pressure issues, or are taking other medication for heart-issues, consult with your physician before using medical cannabis products.
CHILDREN AND PETS: Keep cannabis products away from children and pets. Cannabis infused food products are particularly hazardous for children and pets, and extra precautions must be taken to ensure their safety.
DRUG INTERACTIONS: Cannabis may have negative interactions with certain medications. Consult with your physician or dispensary before using cannabis products with other medications.
IMPAIRMENT: The THC in cannabis is psychoactive and may cause temporary impairment of motor functions, coordination and cognitive function such as short-term memory. Cannabis may cause anxiety and/or paranoia. Do not drive or operate heavy machinery if impaired by cannabis-medicated products.
PREGNANCY: There are potential risks associated with maternal use of cannabis and prenatal exposure to cannabis. Patients who are pregnant or nursing should consult with their physician before using medical cannabis products.
PSYCHIATRIC: Cannabis may trigger a psychotoxic reaction in a minority of users. Patients with a history of psychotic disorder should avoid or use extreme caution with medical cannabis products.
RESPIRATORY: Cannabis combustion with no harm reduction techniques may lead to respiratory irritation, bronchitis or other complications. Cannabis smoke differs pharmacologically from, and is substantially less carcinogenic than, tobacco smoke; however it still contains many of the same toxins.
WITHDRAWAL: There are no significant withdrawal effects when cannabis use is ceased or decreased, however minor restlessness, nausea, and fatigue may be experienced. Symptom relief may also cease.

WHAT TO EAT TO GET BETTER
(Website Draft)

The following is an overview of which foods can help in the treatment of specific diseases. For more information, visit our website at www.PharmaFarm.com.

- Fighting illness is not a singular issue
- Health and wellness is not simply achieved by taking a pill or using cannabis
- Fighting your illness is battle that must be fought on all fronts to win.
- You can win the battle but nothing good comes easy.

- Your body did not become sick in one day and will not get better in one day, so be patient but let's get to work!

FRUITS:	Always eat fresh fruits that are brightly colored, not just the skin but right down to the core. Pay particular attention to red, blue, purple and orange colored fruits like pomegranate, orange, blueberries, cantaloupe, black raspberry, red plums, red guava, watermelon, tomato and tart cherries.
VEGETABLES:	Look for fresh green leafy vegetables like collard greens, kale, swiss chard, arugula, watercress, mustard greens, spinach and radicchio (and while not leafy, don't forget the broccoli.)
Multiple Sclerosis:	Vegetables, fruit, nuts, legumes and whole grains.
Glaucoma:	Citrus fruit, tomatoes, leafy green vegetables, peppers, avocado, nuts and seafood.
Epilepsy:	Fruits, vegetables, legumes and whole grains.
Cancer:	RED fruits, lean meats, green leafy vegetables, and whole grains.
Parkinson's Disease:	Lunch – carbohydrates and vegetables. Dinner – meat, fish and cheese. Moderate amounts of fermented foods (beer, sauerkraut, wine and yeast-based foods)
Spinal Cord Damage:	Choose more vegetables than fruit, more fruit than starch, more starch than meat and dairy and more meat and dairy than sugar and fat.
Crohn's Disease:	Almond milk, eggs, oatmeal, vegetable soups, salmon, papaya, pureed legumes, rice, avocado and smooth nut butters.
PTSD:	Leafy green vegetables, garlic, cabbage, broccoli, onion and red fruits.
Cachexia:	RED fruits, lean meats, leafy green vegetables and whole grains – increase intake gradually.
HIV/AIDS:	Fruits, vegetables, whole grains, legumes and lean sources of protein.

AND AS HARD AS IT MAY BE, STAY AWAY FROM SUGARY FOODS!

PHARMAFARM WEB TEMPLATE

WHO WE ARE

Mission Statement
Company Team
Code of Ethics
Community Support
- P.A.V.E. The Way
- Office of The Aging

Contact Us

PATIENT RESOURCES

The ABC's of CF&T's
- Cannabinoids
- Terpenoids
- Flavonoids

Concentrate versus whole plant flowers
"Brand" Specification
Product Guide
Your Health
Delivery Systems
Dosing Guide
Label Guide
Support
- Substance Abuse
- VA CT Healthcare
- Dept. of Social Services
- Dept. of Mental Health
- List of Dispensaries

Contact Us

PRODUCTS

Concentrates
- Capsules
- Oil: Vapor
- Oil: E-Vap
- Oil : Oral
- Lozenge
- Culinary Oils

Whole Flowers
Topical
Dosing Guide
Kosher Cert
Label Guide

YOUR HEALTH

Food Is Medicine
Super Foods of Health
Recipes
Culinary Oil Recipes
What to Eat To Get Better
How to Read a Food Label
Calendar of Events
- Cooking Classes
- Tai Chi Classes
- Substance Abuse
- Seminars & Lectures

Tips for Dining Out

PHYSICIAN & DISPENSARY RESOURCES

The A to Z's of CF&T's
- Cannabinoids
- Terpenoids
- Flavonoids

Concentrate versus whole plant flowers
Entourage Affect
Endocannabinoid System
Clinical Resource Library
LATEST Cannabis Research
Product Guide
Dosing Guide
Delivery Systems
Label Guide
Calendar of Events
- Roundtable Discussions
- Seminars & Lectures

List of Dispensaries
Contact Us

USEFUL LINKS

IACM
CCCI
O'Shaughnessy's
VA Healthcare
Dept. of Social Services
Office of the Aging
Dept. of Mental Health
List of Dispensaries
NE Journal Medicine

CONTACT US

PHARMAFARM CAREERS

MEDIA RELATIONS

TIPS ON HEALTHY DINING OUT
Website Draft

Dining in a variety of restaurants should be easy to do and be enjoyable. However, foods served in restaurants are often served in abundance and tend to contain high-calorie ingredients. One thing we want to say up front – whenever possible, stay away from the fast food chains if you do have to eat here, NEVER order the "mega-meals.

More with honey than with vinegar. Make your server a friend. Usually they know everything about the food, ingredients and the kitchen.

Above all else, be assertive. For instance, if an item is fried, ask for it grilled. If it comes with french fries, ask for a side of veggies instead. Request a smaller portion of the meat and a larger portion of the salad; for salad instead of coleslaw; baked potato instead of fried. "Just assume you can have the food prepared the way you want it," Very often, the restaurant will cooperate." Below, are more specific requests.

Ask your waiter to "triple the vegetables, please." Often a side of vegetables in a restaurant is really like garnish — a carrot and a forkful of squash. When ordering, ask for three or four times the normal serving of veggies, and offer to pay extra. Typically you are never charged however the real message is get full, not fat.

All you can eat? Best to retreat!: Avoid the all-you-can-eat buffets, easy to overeat here and lots of bad calories floating in those buffet trays.

Ask how the food was prepared; don't go by the menu. For instance, cholesterol-free does not mean fat-free; the dish could still be filled with calorie-dense oil. Neither does "lite" necessarily mean light in calories or fat.

Order from the "healthy, light, low fat" entrées on the menu. Most chains will even list the calories and nutritional content of such foods. Applebee's, for instance, offers approved Weight Watchers options and Ruby Tuesday lists the nutritional information for its entire menu.

Beware of the low-carb options. Restaurant chains have jumped on the low-carb bandwagon, offering numerous low-carb options on their menu. But low-carb doesn't mean low-cal. For instance, at one restaurant chain the Low-Carb New Orleans Seafood packs 710 calories and 42 grams of fat — ouch! A much better bet, the Low Carb Veggie Platter — leaves you with just 297 calories and 16 grams of fat.

Ask the waiter to box half your entrée before it ever gets to the table. Or split an entrée with your dining partner. A CSPI survey found that restaurants often serve two to three times more than food labels list as a serving.

Try double appetizers. If there is a nice selection of seafood and vegetable-based

appetizers, consider skipping the entrée and having two appetizers for your meal. Often, that is more than enough food to fill you up.

Order a salad before ordering anything else on the menu. Scientists at Pennsylvania State University found that volunteers who ate a big veggie salad before the main course ate fewer calories overall than those who didn't have a first-course salad.

But remember: Salads shouldn't be fatty. This is a vegetable course — keep it tasty but healthy. That means avoiding anything in a creamy sauce (coleslaw, pasta salads, and potato salads), and skipping the bacon bits and fried noodles. Instead, load up on the raw vegetables, treat yourself to a few well-drained marinated vegetables (artichoke hearts, red peppers, or mushrooms), and for a change, add in some fruit or nuts. Indeed, fruits such as mango, kiwi, cantaloupe, and pear are often the secret ingredient in four-star salads.

Watch the add-ons to vegetable salads. Even salads that are mostly raw vegetables are a problem if they're loaded with cheese and meats. Take the typical Caesar salad in most restaurants (the one topped with chicken or shrimp as well as plenty of cheese and mayo in the dressing). Add in the fried croutons and the calories add up to a whopping 560, with 36 grams of fat, 6 of them saturated. Italian antipasto salads also are a health challenge, with all their salami, spicy ham, and cheese. Get the salad, but ask for vegetables only.

Do the fork dip. The best way to combine salad dressing with salad? Get your dressing on the side, in a small bowl. Dip your empty fork into the dressing, then skewer a forkful of salad. You'll be surprised at how this tastes just right, and how little dressing you'll use. Plus, your lettuce won't wilt and drown in a sea of oil.

Check the menu before you leave home. Most chains post their menus on their Web sites. You can decide before you ever hit the hostess stand what you're going to order. Conversely, if you don't see anything that's healthy, pick another restaurant.

Read between the lines. Any menu description that uses the words creamy, breaded, crisp, sauced, or stuffed is likely loaded with hidden fats — much of it saturated or even trans fats. Other "beware of" words include: buttery, sautéed, pan-fried, au gratin, Thermidor, Newburg, Parmesan, cheese sauce, scalloped, and au lait, à la mode, or *au fromage* (with milk, ice cream, or cheese).

Ask the waiter to skip the bread basket. If you must have something to munch on while you wait for your order, ask for a plate of raw vegetables or even some breadsticks.

Skip the fancy drinks. If you order an alcoholic drink, forget the margaritas, piña coladas, and other exotic mixed drinks. They include sugary additions that only add calories. Opt instead for a glass of wine, a light beer, a vodka and tonic or a simple martini (without the chocolate liquor, sour green apple schnapps, or triple sec).

Top a baked potato with veggies from the salad bar. Or ask if they have salsa — the ultimate potato topper, both in terms of flavor and health. Just avoid the butter and sour cream.

Order fish. Just make sure it's not fried. When the CSPI evaluated food served at seafood chains and independent restaurants, researchers found low-fat and low-sodium options abounded. Plus, you can order seafood so many different ways — steamed, baked, broiled, sautéed, blackened, or grilled. Nix any sauces, or ask for them on the side.

Drink water throughout the meal. It will slow you down, help you enjoy the food more, and let the message get to your brain that you're full — before your plate is empty.

Always dress up to go out. (Even if it's just a regular family restaurant.) If you view eating out as an event or a treat, rather than a way to get an everyday dinner, you won't eat out as often. And that's good from both a health and a cost standpoint.

Skip the dessert. You can always have some sorbet or even a small piece of chocolate at home. That is much better health-wise than the Triple Chocolate Meltdown or a mountain of ice cream topped by a second mountain of whipped cream.

6 Tips to Ordering Chinese

- Switch the white rice with brown rice.
- Start your meal with wonton, egg drop, or hot-and-sour soup.
- When it comes to entrées, order from the 'health' menu.
- Make sure you order plenty of vegetables.
- Take advantage of the bean curd (tofu).
- Plan to take home leftovers.

4 Tips to Ordering Italian

- Ask the waitperson not to bring the breadbasket.
- If you want pasta, order a dish from the appetizer section of the menu, or share.
- If it's on the menu, order simple grilled beef, veal, pork, chicken, fish, or shellfish.
- For dessert, ask for fresh berries or fruit ice, if it's available, or a small plate of cookies to share.

6 Tips for Ordering Mexican

- Ask the waitperson to take away the tortilla chips.
- Order a healthy starter instead.
- For an entrée, look to fajitas.
- Order tacos or burritos without high-fat sour cream.
- As a side dish, go for rice and beans instead of Mexican rice.
- Have dessert at home.

HOW TO READ A FOOD INGREDIENT LABEL
Website Draft

Finding healthy foods at the grocery store is easier than ever, due to label regulations by the United States Department of Agriculture (USDA) and the Food and Drug Administration (FDA.) Package labels can be easily read and provide valuable information at a glance. There are two places on the label on which to focus.

The "Nutritional Facts" Panel

- Shows serving sizes and nutrient amounts.
- It can also help you to make wise decisions if your want to increase fiber, cut back on the amount of fat in your diet and lessen the amount of sugar or cholesterol in your diet.
- Because the amount of each nutrient on the label is based on the serving size listed, be sure to double the nutrient and caloric value if you double your serving size, or adjust downward if your eat only one-half the serving size

The "Ingredient List"

- Is a summary of the contents of the product.
- Listed in order from the greatest to smallest by weight. For example, if a cereal lists its ingredients as rice, sugar, nuts and salts, this means that these is mostly rice in the cereal followed by sugar and then the other ingredients in diminishing amounts.
- You may find many surprises as you read ingredient labels. For instance corn syrup is added to some brands of peanut butter.
- It can also be surprising to discover what is not contained in a given product, such as the lack of a sufficient amount of chicken contained in many canned chicken soups.

Nutrition in a Nutshell

- Food is more than just something to eat. I
- It comprises what we are made of and profoundly affects our well-being.
- By making wise choices when selecting foods, you can optimize your health and at the same time, savor every bite.
- Enjoy your diet changes and remind yourself of your investment in continued good health.

SECTION E. FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE
Sub-Section E.2 Organizational Flow Chart

2nd Tier Security
Educational Marketing
Programming Jeff Zimmerman
2nd Lead Grow Facilities Mgt.
Assistant Lead Grower
Grow Team (6) Members
Manufacture and Packaging Team (2) Members
Dileone Lab
Yale School of Medicine

SECTION F. AGRICULTURAL AND PRODUCTION EXPERIENCE

The company's pharmaceutical grade cannabis growing and manufacturing expertise includes;

LEAD AGRONOMIST
Michael Nevas

- Over five years indoor cannabis agronomist in Montana and Washington.
- Thorough understanding of phytochemical-specific strain development.
- Strong background in non-solvent based extraction techniques.
- Comprehensive experience in non-combustible delivery systems.
- Experience in unit dosing.
- Build-out, pre-launch, launch and post launch experience.
- Amsterdam, Netherlands educated in strain development, cloning protocols, lighting layout and design, grow mediums, nutrient options, irrigation methodologies and a variety of indoor growing techniques.
- Credited with the creation of two popular Pacific Northwest strains; Montana Sour Tip and California Lemon.
- Has attended every major cannabis industry tradeshow in the U.S.A. and in Vancouver, Canada for the past 8 years to keep current in industry ideation, development and new technology.
- Custom designer of drip-control irrigation systems.
- Has spent the past three years studying the published works of GW Pharmaceuticals and specifically the research of Russo and McPartland on cannabinoids, terpenoids and flavonoids and their entourage affect.
- Has been an outdoor cannabis grower in Montana from 2004-2008.
- Has a complete understanding of all cannabis-specific grow requirements including but not limited to;
  - Seed germination.
  - Mother plants - pest resistant, yield, geometric traits, strain specific.
  - Cloning and hybridization - vegetative propagation.
  - Strain development techniques.
  - Grow medium options.
  - Growth Stage Development
  - Requirements by strain - indica, sativa, hybrids.
- Lighting - type, wattage, cycles, interference-free ballasts, hoods, venting, heat reclamation.
- Primary nutrients - nitrogen phosphorous, potassium Secondary nutrients -calcium, magnesium, sulfur andapplication requirements, burning, handling and storage.
- Water requirements (pH 5.9-6.5, de-chlorination, filtration, oxygenation, mineral content intact.)
- Temperature management (consistency, 75-86°F/24-30°C).

- Topping and pinching techniques.
- Humidity management.
- Mold and mildew prevention.
- Air movement management.
- Odor control management.
- Co2 requirements
- Harvest timing

- Drying.
- Curing.
- Trichome handling and trimming techniques.
- Secondary plant material product development.
- Bulk packaging, retail packaging and storage techniques.
- Expiration dating.
- Pro-active infestation management.
- Spider mite expertise with two-spot mite versus available predators including lady bugs, lacewings and spider mite predators.
- Waste management.
- Expiration dating.
- USDA NOP working knowledge.
- WHO GMP Guidelines for Herbal Medicines understanding

Michael Nevas

Cannabis Agronomist and Extraction Specialist

MEDICINAL CANNABIS STRENGTHS

- Over Five Years Indoor Cannabis Agri-Grow Experience
- Thorough Understanding of Phytochemical-Specific Strain Development
- Strong Expertise in Non-Organic & Organic Solvent Extraction Techniques
- Comprehensive Background in Delivery System Implementation
- Experience in Precise and Accurate Metered Unit Dosing
- Grow Facility Pre-Launch, Launch and Post Launch Experience

BUSINESS STRENGTHS

- Firm But Compassionate Employee Management Skill-Sets
- Cash Handling Experience Including Large Bank Deposits
- Financial Accountability and Line Item Budgetary Responsibilities
- Regulatory Understanding and Successful Implementation Thereof
- Strong Task Completion Skill-Sets

PERSONAL STRENGTHS

- Integrity Driven
- Highly Professional
- Trustworthy
- Passionate and Hard Working
- Detail Oriented
- Solid Communication and Leadership Skills
- Works Well With Others
- Patient Motivated

EMPLOYMENT HISTORY

Current Employment
Washington Bluestone
Owner-Operator **2012-2013**
Legal grower in Washington with a focus on disease-specific cannabis research, development and growing for certified patients. A strong focus on non-smoking delivery systems, concentrates and extraction processes while insuring the highest quality pharmaceutical grade whole plant toxin –free medication. Developed and launched Washington Bluestone.

PREVIOUS EMPLOYMENT
Red Dot LLC, Missoula, Montana **2010-2012**
Owner-Operator
Medicinal grow facility of 9000 square feet. Responsible for complete management of the production facility and all products being manufactured. Business closed due to federal interdiction concerns and moved to the state of Washington. Developed and launched Red Dot. Year 1 Annual Sales: $1,350,779.

Montana Cannabis and Hemp Foundation, Missoula, Montana **2009-2010**
Pre-Launch and Grand Opening Manager
Assisted Kevin Kerr, owner and head grower in;

the renovation, start-up and on-going day-to-day operations grown facility, tracking and accountability of all plants and plant materials processing and packaging of all products for retail sales inventory management including FIFO practices, staff training daily opening and closing security proceduresoffice management and banking responsibilities. Year 1 Annual Sales: $1,535,590.

Montana Cannabis, Missoula Montana **2008-2009**
Infused Oral Dosing Production Associate
Trained by renown Chef Timothy Michael Williams of Colorado in the fundamentals of cannabis extraction, product development for nutritious, cannabis infused product manufacturing of infused product dosing and potency standards.

Other Experience **2004, 2006-2008**
Have continuously grown medicinal cannabis for patients in Montana since it became legal in 2004.

CANNABIS EDUCATION
Amsterdam, Netherlands **2005**
Traveled to Amsterdam for one year to research and study Dutch strain development techniques, cloning protocols, lighting configurations, water analysis, grow medium options, nutrient alternatives and a variety growing techniques.

Industry Knowledge **2005-To Date**
For the last 8 years have attended every major cannabis industry tradeshow in the U.S.A. and in Vancouver, Canada to stay abreast of new industry trends and developments in equipment, nutrients, lights, water, Co2 , packaging, laboratory analysis, cloning and other cannabis grow-related requirements

Pharmaceutical Research **2009-To Date**
Have spent the last three years studying the published works of GW Pharmaceuticals and specifically the cannabis research and development spearheaded by them since 1998. Research includes cannabis breeding by genetic model, controlled cultivation and breeding program, phytocannabinoid chemotypes and natural cannabinoids.

HONORS AND RECOGNITION
Am credited with the creation of two popular Pacific Northwest cannabis medical strains;
Montana Sour Tip
California Lemon.

TECHNICAL EXTRACTION & INFUSED MANUFACTURING SPECIALIST
Rose Habib

- Five years experience in nutraceutical production and quality control.
- Licensed analytical chemist.
- Twenty years quality control and regulatory laboratory experience
- US Pharmacopeia familiarity.
- Working knowledge of cGMP's, Good Laboratory Practices and FDA compliance.
- Streamlining production for highest possibly consistency and throughput.
- Working knowledge of Department of Health requirements.
- Developed methodologies for precise, accurate and consistent oral dosing delivery systems.
- Working knowledge of sub-critical and super-critical Co2 extraction.
- Significant understanding of medicinal benefits of cannabinoids, terpenoids and flavonoids.
- Expiration dating and moisture analysis.
- Nitrogen flush and barrier proof packaging experience.
- Large volume cannabis manufacturing experience.
- Product development expertise;
    - Encapsulation
    - Sublingual spray
    - Dosed lozenge
    - Dosed sublingual strip
    - Dosed glycerin tincture
    - Dosed e-cig vaporizer
    - Dosed baked goods
    - Topical and trans-dermal
- Experience in microbiological testing, mycotoxin testing, heavy metal testing and pesticide chemical residue testing.
- Experience in cannabinoid, terpenoid and flavonoid testing

PHARMACEUTICAL EXTRACTION and ISOLATION CONSULTANT
John Arnett PhD., Owner, Seven Hills Chemicals

- Licensed pharmaceutical chemist.
- Thirty plus years working knowledge of pharmaceutical-based extraction and isolation technologies.
- Complete understanding of extraction equipment and methodologies for whole plant materials.

- Working knowledge on safe operating protocols for all extraction equipment.
- Pharmaceutical product development background including unit metered dosing.
- Experience in handling licensed controlled substances for analysis, product development and manufacturing.
- US Pharmacopeia familiarity.

NUTRACEUTICAL AND COSMECEUTICAL CONSULTANT
Steven Kushner, ALM R&D Inc.

- Product development expertise for over-the-counter topical and trans-dermal formulations and delivery systems since 1982.
- Product development expertise in nutrient-rich, grain based snack bars.
- Nutritional therapy expert**.**
- Shelf-stability and unit dose packaging experience in the health and wellness channels.
- Working knowledge of cGMP's and FDA compliance requirements.
- US Pharmacopeia familiarity.

STEVE KUSHNER

Born: 3-7-61 Cleveland, Ohio
Current Residence: Pinellas County, FL since 1975
Occupation: Nutritional Consultant and Product Development

- Involved in filed of Nutriceutical R&D since 1982
- Dissertation work on Protomorphogen Therapy
- Received license in Massage Therapy, Tampa, FL 1984
- Studied under Dr. Hazel Parcells in Albuquerque, NM
  Dr. Parcells was a nutritional pioneer in the U.S. and revolutionized nutrition therapy from the 1930's through the 190/s when she passed away at the age of 106.

Healing Modalities
Natural Healing
Whole Food Therapy
Energy Healing
Vitamins, Minerals and Trace Minerals
Herbology
Homeopathy and Cell Salt Therapy
Protomorphogen Therapy
Nano-Technology

Professional Experience

- Product Research and Development since 1982

- Massage Therapist from 1984-1992 (Clients included V.P. George Bush)
- Owned and operated Natural Foods Stores 1986-1990
- Developed line of sublingual body building products marketed in over 500 GNC and other stores.
- Worked with Pyramid Power Products from 1991 to present as consultant. Developed several food and nutrition products distributed internationally.
- Worked with TrimFast Group from 1998-2001 consulting on the development of health products sold nationwide.
- Worked with Genetrix Neutriceuticals from 2000-2005 developing sports nutritional supplements for national distribution.
- Worked part-time as Youth Director with Skycrest Methodist Church 1998-2005. Area of focus included Bible study, religious education and mission work.
- Worked for NutraLab from 2005-2007 as Vice-President of Research and Development. Focus on innovative supplements.
- Worked for Iasun, Inc. from 2005-2007 as President. Focus on research and development of specialty cosmeceutical products for the retail and professional markets.
- Worked for E-Food Safety/Nuvilex from 2006-2010 as consultant. Focus on product development, product design, manufacturing and marketing of OTC and other topical and ingestible products.
- Own and operate ALM R&D from 2008 to present. Specializing in full service consulting in the nutriceutical and cosmeceutical industries.
- Minority owner and head of R&D for PuriCorp Holdings specializing in nutriceutical kits for addiction cessation. 2010 to present.
- Head of R&D for Euphorix Beverage Company, 2011 to present.
- Consultant for Vintage Foods Ltd. specializing in terpeneoid, flavonoid R&D and product development, 2012 to present.

Papers Published

Declinol, a Complex Containing Kudzu, Bitter Herbs and Bupleurum, Significantly Reduced Alcohol Use Disorders Identification Test (Audit) Scores in Moderate to Heavy Drinkers: A Pilot Study. J. Addict Res Ther 4:153.

Studies Conducted

Declinol Pilot Study (as referenced above)
Apiquel IRB Double Blind Placebo-Controlled Study for Food Addiction. IRB approved by Wright State IRB.
Inabrex Pilot Study for smoking cessation.
Puridone Study for opiate withdrawal symptoms: Methadone Clinics in PA
MyoVim Study for exercise endurance on the before and after results using MyoVim to lower lactic acid levels.

Original Products Developed by Steve Kushner

Mega-Cuts, Mega-Mass: Sublingual bodybuilding formulas

Come Alive: Nutrient dense comprehensive whole food nutritional supplement
Super Stay Alive: Anti-oxidant, immune and energy enhancer
Cygnus Explosion: Carbonated herb and protein beverage.
TrimFast Energy Bars: Nutrient rich energy bars endorsed by WCW wrestlers
Leptolean: No-stimulant metabolic enhancer for weight loss.
Cortigen: Anti-anxiety, cortisol blocking supplement for weight loss.
DEXL-10 Hoodia Thermo: Supplement for weight loss to suppress appetite and increase metabolism and digestion.
Cinnergen: Liquid whole food supplement for balancing blood sugar.
Fulvium: Unique multi-mineral/trace mineral supplement employing a rare deposit of Fulvic Compounds to enhance absorption.
Talsyn-CI: Clinically proven organic based scar cream sold through professional offices. Also developed Talsyn Skin Care: ageless cream, moisturizers, creams and toners.
Arnica Mist: Topical solution with proprietary technology for alleviating bruising and trauma to skin.
PuriDone: Multi-Vitamin and Mineral Liquid Supplement: Utilizes nano-technology to delivery essential vitamins, minerals and herbal foods for maximum benefits. Clinically researched to provide benefits for withdrawal from opiates and methadone.
Declincol: Launched in January 2013, is for alcohol cessation sold through professional channels and clinically researched.
Apiquel: For Foods Addiction, launching late 2013.
Inabrex: For smoking cessation, currently in pilot study, launching late 2013.
Euphorix: Single dose beverage supplement to improve mood and mental energy. Launch in the U.S. and New Zealand in fourth quarter 2013.

Client List: The following people have not be paid to endorse the products I have developed but they do use or have used them. They are listed for informational purposes only and can not be listed for promotional purposes whatsoever.

Shaquille O'Neal, Dominique Wilkins, Scottie Pippin, Terry Cummings, Hakeem Olajuwon, Craig Hodges, Sean Elliot, Charles Smith, Khaliah Ali, Butch Reynolds, John Mackey, Roy Disney, Sinbad and Eric Dickenson

Jeff Zimmerman, Qi-Gong Master

For most of his life Jeffrey C. Zimmerman has been tuning instruments. The first half, starting at the age of 12, it was the upright bass; the second half, since his early 20s, the human body. Once on a career path to be a classical musician in a symphony orchestra, over the past three decades Zimmerman's educational pursuits in music and health have earned him degrees from the Royal Academy of Music and the Royal College of Music, both in London, and the titles, Licensed Acupuncturist and Doctor of Oriental Medicine. In New York City in the late '80s early '90s, by day Jeff studied acupuncture at the University of Aruba's satellite program, financing his education

by night playing bass guitar in the Broadway production of the Tony Award-winning musical, Les Misérables. After earning U.S. recognition from the National Certification Commission for Acupuncture and Oriental Medicine, Jeff traveled to China to earn acupuncture certification from the Academy of Traditional Chinese Medicine in Beijing. Jeff has also become a master practitioner in the ancient Chinese healing art of Qigong ("chee Kung"): "Qi" meaning "energy" or "chi," and "gong" meaning "work" or "practice" – one that is assiduous in nature, like the martial arts Daoist Tai Chi/Qigong and Shaolin Kung Fu (Wushu), which Jeff began studying in 1988 and continues today, part of his core training that grounds his Westport, Conn., practice. Ask him to describe his work, though, he says, "I put things in 'sync'" – and therein lays the symphony that Jeff performs. Jeff will;

- work with PharmaFarm employees daily for the development and promotion of their personal health and wellness twice daily.
- work with the plants daily to generate positive energy during their grow cycles
- work closely with patients state-wide teaching and educating them on how to pro-actively approach healthcare from a self-care modality. Training will be given in Tai-Chi and Qi-Gong.

PRESIDENT & GENERAL MANAGER
David Kimmel

- Food product formulation background in the health and wellness channels.
- Experienced in small batch and large-scale food manufacturing.
- Working knowledge of health regulations for safe food handling.
- Experienced in volume production baking.
- Inventory, purchasing and quality-control procedural and operational background and expertise.
- Experience in nitrogen flush, barrier proof packaging and retail packaging.
- Good understanding and experience in botanical volatile oil extraction and isolation.
- Expertise in handling temperature and time sensitive food perishables in both production, storage and logistic channels.
- Culinary school graduate.
- Instructor (past and current) in perishable food production, alcoholic beverage inventory and controls, purchasing and operations management.
- Complete understanding and experienced in cannabis extraction in cold-pressed, consumable fats, oils and other lipids.
- Complete understanding of the safe and efficient operation of a professional manufacturing kitchen and the equipment thereof.
- Complete understanding of sanitation procedures in food handling areas.
- Working knowledge of packaging perishable and non-perishable products.
- Working knowledge in maintaining the highest active ingredient levels in botanical extraction processes for manufacturing applications.
- Solid understanding of cannabinoid, terpenoid and flavonoid compounds and their medicinal benefits for patient efficacy.
- Product development background on single serve and unit dose delivery systems.
- Agricultural experience in strawberries, blueberries, heirloom tomatoes, pomegranate and not from concentrate juice-processing experience.
- Working knowledge of USDA perishable commodity rules, regulations and inspection requirement.
- Working knowledge of USDA NOP standards and program.
- WHO GMP Guidelines for Herbal Medicines understanding
- Cash handling experience.
- Controlled substance handling experience.
- Employee management and human resources experience.
- Accounting software and bookkeeping experience.
- Distribution and logistics experience

- Marketing and sales experience.
- Habla español.

David Kimmel
Background

David Kimmel has been a lifelong student of the culinary arts and has been associated with the food & beverage industry since 11 years of age when he first contacted the Lipton Tea Company suggesting that their new flow-thru teabag include sugar and lemon. While Lipton did not pursue his idea, the company did send him a free case of tea.

Kimmel is a hands-on food & beverage innovator who marries concept to market and market to need, always with a sharp eye on culinary evolution, wellness and financial feasibility. Kimmel is Founder and President of Vintage Foods Ltd., a company legally formed in early 2010, specializing in the development and launch of pharma-based, whole plant medicinal cannabis products.

Over the last 35 years, Kimmel has traveled the growing fields and food markets internationally sourcing wellness-based naturally occurring food and beverage ingredients. He has had significant impact on the development and proliferation of a number of functional food products utilizing pomegranate, purple carrot, hibiscus, heirloom tomatoes, wolfberry (goji), yacon, chaga, stevia, and tart cherry,

Kimmel cut his teeth with the prestigious George Lang Corporation where as an associate, he developed, projected managed and launched food & beverage projects internationally for clients including General Foods (Maxwell House), The Museum of Modern Art (NYC), The Helmsley Palace (NYC), The Culinary Institute of America (American Bounty Restaurant), Shehi (Kuwait), Doubletree Hotels, Sheraton Hotels, Sky Chef, and Movenpick. Later as vice-president, Kimmel managed all the company's projects internationally until in resigned to form his own company in 1985.

Forming Caraway Associates Ltd., Kimmel went on to create and bring to market a variety of food and beverage concepts and products for clients including Dick Clark's American Bandstand Grill (Dick Clark Productions), Central Park/City of New York Boathouse, The World Financial Center (Olympia & York, NY), Mezzaluna (Amman, Jordan), the Chattanooga Choo-Choo, (Chattanooga, Tenn.), General Mills, IMAX Theaters, and the Bakers Pride Oven Company.

In 1992 Kimmel become partner and eventual sole owner in Blue Hill Restaurant Corp., which developed and operated six restaurants, a live music venue featuring

national acts, an upscale newsstand and healthy snack shop and an off-premise catering company handling events up to 2500 guests, including the grand opening of the Palisades Mall, the second largest mall in the U.S.

In 1999 Kimmel formed Off-Season Fruit & Produce, an importer of record of fruit and produce growing bringing fresh fruit into North America during the niche markets. He spent significant time in Argentina and India working with growers on developing products and markets for Camaroza strawberries, Highbush blueberries, stone fruits and Arakta and Ganesh pomegranate for sales in IQF, juice concentrates, fresh market and essence and aroma production.

Kimmel is co-author of Mommy Made and Daddy Too! (Bantam Doubleday 1991, revised 2000.) This baby/toddler cookbook and parenting guide has sold approximately 150,000 copies to date. Kimmel was also project manager for the Goldstar Microwave Cookbook "In Short Order", concept and recipe developer for "The Bloomingdale's Eat Healthy Diet" and contributing author for the Time/Life "Meals in Minutes" series.

Kimmel has lectured at Cornell University's Hotel Management School (International Summer Program), The New York City Bureau of Nutrition, The National Barbecue Association, The International Microwave Convention, Pune' Pomegranate Co-op, and The Buenos Aires Food & Beverage Collaborativo. Currently Kimmel is an Adjunct Professor at State University of New York (SUNY) Rockland teaching credited courses in Food & Culture, Alcoholic Beverage Management and Purchasing and Inventory Control. He also continues to lecture annually at Farleigh Dickenson University on health and wellness trends and nutrition.

Kimmel's not-for-profit service includes past Chairperson for Meals on Wheels of Rockland County, New York and Vice-Chairperson for the Hudson Valley Children's Museum. He has also received awards for his community service including United States Congressional Recognition, NY Senate and NY Assembly Recognition.

Kimmel is a Class of '77 honors graduate from the Culinary Institute of America (CIA). Prior to graduation, Kimmel was requested to take leave of absence and train the grand opening kitchen staff at the Inn of the Mountain Gods, the first Indian-owned (Mescalaro-Apache) resort property in the USA. In his senior year, Kimmel sponsored Harry Chapin and The Little Feat Band to perform at the CIA to raise money for World Hunger Year. Upon graduation Kimmel accepted a one-year fellowship at the Institute, returned later as an instructor and served eight years as a Member of the Institute's Board of Trustees where he was Chair of the Long Range Planning Committee. Kimmel was also the conceptual designer for the Institute's public restaurant, the American Bounty.

Kimmel (Kümmel) means "one who sold caraway seed."

SECTION G. PRODUCT AND SITE SAFETY
Sub-Section G. 1. Mold, Mildew, Bacteria, Heavy Metal, Pest and Disease Protection

MOLD, MILDEW and BACTERIA PROTECTION
CONTRACTOR and SUBCONTRACTORS PROGRAM DURING BUILD-OUT

- Incorporate indoor air quality goals into the bid and construction documents
- Conduct safety meetings, develop signage, and establish subcontractor agreements that communicate the goals of the construction indoor air quality plan.
- Require contractors to provide information on product substitutions sufficient to enable PharmaFarm team to properly maintain and repair materials in place.
- Require the development and use of an indoor air quality management plan. The purpose of the management plan is to prevent residual problems with indoor air quality in the completed building and protect workers on the site from undue health risks during construction. The plan should identify specific measures to address:
    - Problem substances, including: construction dust, chemical fumes, off-gassing materials, and moisture. The plan should ensure that these problems are not introduced during construction, or, if they must be, eliminates or reduces their impact.
    - Areas of planning, including: product substitutions and materials storage, safe installation, proper sequencing, regular monitoring, and safe and thorough cleanup.

CONSTRUCTION

- Keep building materials dry
- Seal ALL unnecessary openings, around pipes, cracks or other.
- Temporarily seal duct-work.
- Ventilate when needed.
- During installation of carpet, paints, furnishings, and other VOC-emitting products, provide supplemental (spot) ventilation for at least 72 hours after work is completed.
- Minimize construction dust.
- Use wet sanding for any gypsum board work.
- At least daily, construction debris, dust, and scraps should be adequately cleaned up so that there is less chance that these pollutants will enter occupied areas
- Air-out and flush-out the building at the end of the construction process and

before occupancy.

HVAC

- Double-sloped drain pan - to prevent water from standing and stagnating in the pan.
- Non-corroding drain pan - Made from stainless steel or plastic. Prevents corrosion that would cause water to leak inside the unit.
- Easy access doors - All access doors are hinged and use quick release latches that do not require tools to open. Easy access to filters, drain pans, and cooling coils for proper cleaning.
- Double wall cabinet - The inner wall protects the insulation from moisture and mechanical damage, increases sound dampening, and is easier to clean.
- Tightly sealed cabinet - Small yet continuous air leaks in and out of the unit cabinet can affect inner air quality.
- Minimum 2 inch thick filter slots - For better protection of the indoor environment, as well as the equipment and ducts, the filters slots should be able to accommodate 2 in. or thicker filters.
- Air filter assemblies (racks & housings) designed for minimum leakage - The filter bank should have gaskets and sealants at all points where air could easily bypass the air filters, such as between the filter rack and the access door. Use proper gasket manufacturer supplied filter rack spacers.
- Air filter monitor - A differential pressure gauge to indicate the static pressure drop across the filter bank.
- Corrosion resistant dampers & links - All moving parts such as pivot pins, damper actuators, and linkages are able to withstand weather and moisture-induced corrosion for the full life of the system.
- All areas will be well exhausted.

FINISHING

- The entry mat system will be at least 20 feet long and as wide as the entry doors, and employ three different types of matting.
- Install an air admittance valve if sewer vents are located where any gases can be pulled back into the space.
- Seal all openings in walls, floors, and ceilings that separate conditioned space (heated or cooled) from unconditioned space.
- Inline virgin charcoal air filters
- Other filters - MERV 12 and ideally MERV 13 (clean room)
- Grilles protecting air in-takes, drain pipes or other mechanical openings will be bird-and rodent-proofed to prevent perching, roosting, nesting or infestation.
- Well-drained roof, foundation and building perimeter. No standing water around the building or property.
- Pressure differential gauge across all filter banks.
- Use moisture resistant sealants, keeping moisture out of all duct work.
- Fully insulate all cold water pipes and fittings, and condensate drain pipes, with appropriate insulation to prevent moisture buildup.
- Fully insulate all cold refrigerant lines similar to cold water pipes.

- Add appropriate levels of insulation to prevent cool interior surfaces of windows, walls, ceilings, and floors.
- Fully insulate cold-air supply ducts.
- Specify windows and doors with frames and spacers around edges that have thermal breaks
- Seal floors and walls with mold and mildew resistant sealants.

OPERATIONAL PREVENTATIVE MEASURES

- Clean and replace all filters as part of the regular maintenance schedule
- Clean ducts annually.
- Keep bathrooms immaculate using proper cleaning materials for bacteria, mold and mildew prevention.
- Conduct regular inspection and maintenance of indoor air quality measures including ventilation system protection and ventilation rate.
- Clean each room thoroughly after harvest including steam cleaning including tables, walls, floors and ceiling. All lights must be sealed prior to cleaning.

Sealed rooms

- Each room will be sealed with no direct air exchange with other rooms.

In-Line Charcoal Air Filters

- Filters with activated virgin carbon, changed regularly, best suited to remove mold, mildew and bacteria. .

Ozone Generators

- O3 has a high oxidation potential and will assist in the removal all bacteria.
- Ozone generators will be placed in areas where cannabis is exposed to the open air within the facility.

Portable Air Scrubbers

- 1" coarse particulate pre-filter
- 2" pleated pre-filter
- High-output bacteria-killing UV technology
- 99.97% high-efficiency HEPA filters

Barrier-Proof Bulk and Finished Product Packaging

- Multi-laminate foil and plastic
- minimum 3.4 mil
- nitrogen flushed to remove oxygen and inhibit mold, mildew and bacteria growth.

ACTION PLAN: PEST AND DISEASE CONTROL

Diagnosing Plant Damage and/or Distress

Materials:

Reference materials
Micro tip gardening shears
Digital camera
Data from meter readings
USB microscope camera
Examination slide

Designated work clothes and gloves
Label maker
Stainless steel wheeled work cart

Procedure

- Assemble all required materials on a stainless steel work cart and wheel the cart to the finishing room.
- Photograph the entire plant, as well as the affected area(s) of the plant showing the damage and/or distress.
- Disinfect hands and put on latex gloves
- Using the gardening shears, remove a small piece of the affected area (less than 1/16" diameter"), place inside of properly labeled examination slide, and take to the lab area.
- Place the slide in the designated microscope camera, take three pictures, and record your observations.
- Using the reference materials, record your recommendation as to the source of the problem, any potential remedies, and suggestions as to how this problem could be avoided or prevented in the future.
- Deliver your data and recommendations to the lead grower on shift.
- Remove the latex gloves, return equipment to its proper place, and place all used equipment in the "dirty" area to be cleaned at the end of the day.
- Record all data and changes on the computer in the format specified under the standard operating protocol for "Data Entry".

Indicators

Readings from any measurement devices outside of normal range:

- Irregular leaf damage
- Visible insects
- Signs of root stress: Look for signs of leaves drooping, loose stems, or "drooping" plants
- High moisture levels: check the humidity of the room
- Drastic changes in pH: check the pH of the nutrient solution/runoff after a feeding.
- Reduced water/nutrient uptake: check the PPM of the nutrient solution/runoff after a feeding.
- Discolorations on the stem or branch.
- White, brown, or yellow spots.

Prevention

Materials:

Designated work clothes and gloves
Hydrogen Peroxide 3%: Consult MSDS before using
Predatory Insects
TangleSap
Yellow Sticky Traps
Atomizer/Fogger: Sprayer for foliar applications that creates a "fog" instead of a mist, ensuring better coverage.

Microbe Lift BMC

Procedures:

- Use Hydrogen Peroxide 3% solution to clean pruning shears, flood tables, countertops, and any other surface that could come into contact with the plants.
- Never bring any outdoor clothes into the grow area.
- Predatory insects are to be constantly re-introduced into the mother/clone/early vegetative area, and introduced once at the end of the first week in the finishing room. These insects are kept in the storage refrigerator and re-stocked at least once a month.
- In all grow rooms, yellow Sticky Traps are used to monitor the population of winged insects like gnats and aphids. Replace these traps at least once a month, taking pictures of the trap and recording the data for tracking purposes before discarding the old ones. When replacing traps, make a note of any significant changes to the population since the last picture was taken, such as changes in numbers, size, variety, etc.
- Apply Microbe Lift BMC to the nutrient reservoir at the levels indicated on the instructions as a preventative against fungus gnats, aphids, and other medium-based pests.
- Apply TangleSap around the base of all mature cannabis plants to inhibit the movement of insects up the stem, preventing or at least delaying the onset of an infestation.
- Routine sulfur burning in the finishing rooms eliminates any airborne mold or mildew spores that may not be sterilized by normal surface cleaning or mechanical devices as listed above.

Treatment

Spider Mites: Vacuum leaves/buds with a hand vacuum, spraying plants with Mighty Wash followed by Power Wash, usable until the day of harvest.

Materials:

Atomizer/fogger
Hand vacuum
Spray bottle
Mighty Wash
Power Wash
Designated work clothes and gloves
Stainless steel wheeled work cart

Procedure:

- Assemble all required materials on a stainless steel work cart and wheel the cart to the cloning station.
- Disinfect hands and put on latex gloves
- Vacuum all affected leaves to remove webbing, soil particles, and large concentrations of mites.
- Fill the application chamber of the atomizer/fogger with the Mighty Wash solution.

- Plug the atomizer into a nearby 110v outlet.
- Turn the machine on and use the applicator wand to create a "fog" of nutrient solution in a given area.
- Once all plant surfaces in the chosen area are saturated with the solution, apply Power Wash to all surfaces of those plants with the spray bottle.
- Remove the latex gloves, return equipment to its proper place, and place all used equipment in the "dirty" area to be cleaned at the end of the day.
- Record all data and changes on the computer in the format specified under the standard operating protocol for "Data Entry".

Powdery Mildew

Lowering humidity of the room. Applying Mighty Wash followed by Power Wash, usable until the day of harvest.

Materials:

Atomizer/fogger
Spray bottle
Mighty Wash
Power Wash
Designated work clothes and gloves
Stainless steel wheeled work cart

Procedure:

- Assemble all required materials on a stainless steel work cart and wheel the cart to the cloning station.
- Disinfect hands and put on latex gloves
- Fill the application chamber of the atomizer/fogger with the Mighty Wash solution.
- Plug the atomizer into a nearby 110v outlet.
- Turn the machine on and use the applicator wand to create a "fog" of nutrient solution in a given area.
- Once all plant surfaces in the chosen area are saturated with the solution, apply Power Wash to all surfaces of those plants with the spray bottle.
- Remove the gloves, return equipment to its proper place, and place all used equipment in the "dirty" area to be cleaned at the end of the day.
- Record all data and changes on the computer in the format specified under the standard operating protocol for "Data Entry".

Sulfur burner, usable until the first 3-4 weeks of flower –by Lead grower only.

ADDITIONAL ACTION REQUIRED

Action Plan: Determine the cause/source and quarantine the vector of infection. Check moisture levels, look for standing water, irrigation system malfunctions, and other sources water-based problems.

Remove all work clothes immediately after exiting the room and sterilize as soon as possible.

Action Plan: Apply restorative measures
Clean/disinfect all areas that could have come into contact with the pest/disease. Remove or otherwise remedy all vectors of pest/disease contamination. Destroy all contaminated plant matter and organic matter (aka coco-coir) that cannot be sterilized.

HEAVY METAL PREVENTION

Soil Source

Pharmafarm will not be using soil as a medium for its production facility, a common source for heavy metal contamination. The company will be utilizing a coco fiber material that is certified-free of heavy metals.

Water Source – Wallingford

Wallingford utilizes two resources for its water;

- a watershed area
- an aquifer

Wallingford Water Division

- The town Water Division annually conducts a watershed survey by visual inspection of all premises. Of concern are the sewage disposal systems, animal keeping activities, erosion and other potential sources of harmful pollution.
- nearly 50,000 water quality analyses for approximately 125 different contaminants in order to verify the safety and quality of the drinking water.
- These analyses are performed around the clock, 365 days a year, and include samples collected from the "raw" water sources, treatment facilities, and "finished" water within the distribution system.
- In all respects Wallingford water meets or exceeds the standards required.
- The water treatment plants are modern and vigilant maintenance of the distribution system assure the high quality of water today and in the future.

PharmaFarm Preventative Measures

- a water filtration system as part of the irrigation program that includes reverse osmosis with special activated charcoal filters for the removal of any potential heavy metals.
- All waste materials will be handled and treated as a hazardous chemical.
- The Company will have the capabilities and shall engage with its own

heavy metal in-house testing in addition to the state lab testing requirements and those of the town of Wallingford. Heavy metal testing will be conducted no less than once monthly.

SECTION G. Product and Site Safety
Sub-Section G.2 Environmental Health & Safety Training Document

Hazardous Material Safety and Handling

- These are hazards that harm your health, usually from the inside.
- These hazards pose a threat to you usually through internalization of the chemical through exposure.
- There are different types of potential exposure to chemicals in laboratories. These are:
  - Inhalation - the most common method of exposure
  - Absorption – skin, eye, lips, nose
  - Ingestion - accidental (wiping mouth with gloves, drinking in labs) and intentional
  - Injection - with syringes, or other sharps
- Chemicals that can pose health hazards include: carcinogens, irritants, narcotics, toxins/poisons and allergens.
- There are generally two ways the health hazards affect the body: either acutely or chronically.
- Acute symptoms of exposure can show up after only one or two brief
- exposures to the chemical in question. For example, headaches or dizziness from exposure to high levels of gasoline vapors.
- Chronic symptoms of exposure usually show up after many short or long-term exposures that take place routinely over months or years. For example, asbestosis from inhalation of asbestos fibers over many years.

Hazards Potentially found at PharmaFarm

There are a limited variety of chemicals used at PharmaFarm however there are a variety of hazards that may be present. These hazards include but are not limited to:

- Acute Poisoning (chemicals) — Headache, nausea, dizziness, pain, sweating, increased heart rate. (Hydrogen peroxide 3%)

• Co2 (Carbon Dioxide)	Headache, raised blood pressure, muscle twitches, confusion and lethargy
• Compressed Gas	Explosion, bodily damage from falling tanks
• Controlled Substances	Confusion, dizziness, raised blood pressure, increased heart rate, anxiety
• Irritants	Itching, swelling, redness, pain
• Flammables	Fire
• Corrosives and other Chemicals	(Sulfur, peroxide and cleaning) Skin irritation, nausea, sickness, acute poisoning
• High Voltage Electricity	Burns, shock, death.
• Trimming Machine	Cuts, finger loss and serious hand damage
• Pruning Shears	Cuts and lacerations

General Safety Practices

- Chemicals in any form can be stored, handled, and used safely if their hazardous chemical and physical properties are fully understood. This is accomplished through training, engineering controls, and the use of proper personal protective equipment (PPE). If used improperly, chemicals used at PharmaFarm could cause serious injury or death if inhaled, absorbed through the skin or ingested in sufficient quantities.

General Lab Practices

In addition to the policies set forth elsewhere in this plan, the following practices are applicable to the lab at PharmaFarm. Minimize all chemical exposures by:

- Maintaining chemical stocks at an "as needed" level
- Using fume hoods whenever possible, especially for particularly hazardous substances.
- Closing all containers immediately after use
- Wear the appropriate PPE (safety glasses, lab coats at a minimum and gloves when handling chemicals).
- Fully enclosed footwear is required in the labs.
- Promptly report and clean-up all spills
- Never work alone unless others are aware of your location and tasks.
- No eating or drinking in laboratory work areas
- Ensure that emergency equipment are routinely inspected and functioning properly.

Be cognizant of, and follow procedures set forth in the following:

- Injury & Illness Prevention
- Fire Prevention Plan
- Follow hazardous waste disposal procedures as required by the EPA (training provided annually).
- No mouth pipetting is allowed at any time
- Wash hands after removing gloves and whenever leaving the lab (especially

prior to eating, drinking, or using the restroom).

- When transporting liquids, bottles must be contained in rubber bottle carriers, or other suitable secondary containment.
- When carrying more than one bottle, use a cart or other carrier.

Hazard Material Use & Storage

Proper understanding and storage includes;

- **Controlled Substances**
  - THC is potent psychoactive compound which is illegal by federal standards. Specific handling, storage, and spill procedures are describe in a separate document.
- **Corrosives**
  - Check the MSDS for appropriate PPE (minimum gloves, glasses and coat).
  - When using corrosives, make sure to have eyewashes available.
  - Be cautious of heat generation when mixing corrosives.
- **Flammables**
  - In general, liquids with a flash point </= 140 degrees F
  - Isopropyl Alcohol, Denatured Alcohol
  - Respiratory & fire hazard
  - May explode if ignited in significant concentrations.
  - Some solvents are absorbed through the skin.
  - Keep all containers >/= 1 gallon in the appropriate cabinets unless actively using the solvent.
  - Store flammables in approved cabinets.
  - Store liquids in secondary containment.
  - Keep flammables (and cabinets) away from heat, direct sunlight, and electrical sources.
  - Check the MSDS for appropriate PPE (minimum gloves, glasses, coat).
  - Be cognizant of containers with crystalline formations around the caps (possible explosive peroxides).
- **Poisons**
  - All chemicals are poisonous depending on the dose…even water.
  - Could be gaseous, solid, or liquid.
  - Store poisons separately…check MSDS for isolation requirements of extreme poisons and for appropriate PPE (minimum gloves, glasses, coat).
  - Store liquids in secondary containment.
- **Compressed Gas**
  - Aside from the hazard of the gas, these items also present a physical hazard.
  - Never connect or disconnect regulators without receiving training.
  - Keep cylinders secured at all times (use chains at top and bottom).
  - Cylinders not in use must be capped.
  - Only use the approved regulator for gases/cylinders.

- Move leaking cylinders to a safe location until professionals arrive.
- Use a cylinder cart when transporting.

- **Trimming Equipment**
  - Never operate this equipment unless trained and authorized by management.
  - Never attempt to repair, clear or clean this equipment unless the equipment plug has been disconnected from its outlet.
  - When cleaning or clearing, be very careful of any blades or sharp objects.
  - Gloves must always be worn when cleaning the trimming. These gloves are trimmer specific for full arm, hand and finger protection.
  - Always be careful if water is present on the floor around the equipment. The area must be kept dry and slip-free at all times.

- **Pruning Shears**
  - The shears are sharp and must be handled carefully at all times.
  - Always secure the pruning blades when not in use.
  - Shears must be kept in the properly marked storage areas.
  - Shears must be kept clean and sharpened on a regular basis.
- **Grow Lamps**

NEVER touch any High Intensity lamp with bare hands whether when in the package, in transport to the lamp fixture or at any time while in operation.

  - These lamps will burn if touched when in operation.
  - If any oil touches the hand and touches the lamp or even naturally occurring skin oil may cause the lamp to explode when turned on.
  - Never handle a hot lamp, always allow to cool for a minimum of 15 minutes before handling.
  - Always use clean gloves for safety when handling lamps. (See Glove Selection and Use Document Section G, Sub-section G.2)

Personal Protective Equipment (PPE)

It is very important to standardize a level of PPE for all entry into the working areas of the lab and the grow areas;

Laboratory

- At a minimum, any entry into the working area of any lab shall require the use of safety glasses, lab coat, and enclosed footwear.
- The working areas of labs are those areas around lab benches, fume hoods, or other equipment where chemicals or psychotropic materials are used or stored.
- If working on a computer or compiling data, safety glasses and laboratory coat are at the discretion of the employee.

Eye Protection

- Depending on the hazards present, a variety of eye protection can be used.

- For basic lab work involving small amounts of chemicals, safety glasses are often adequate.
- When handling larger volumes of chemicals, especially corrosives, splash goggles may be appropriate.
- If there is ever any question as to what level of eye protection to wear, contact your supervisor before beginning work.
- No eye protection is required when working in the grow areas.

Body Protection

- Depending on the hazards present, there are different levels of body protection.
- Standard lab wear is required in the lab and grow areas.
- When handling larger volumes of chemicals, especially corrosives, splash aprons may be required.
- If there is ever any question as to what level of body protection to wear, contact your supervisor before beginning work.

Foot Protection

- At a minimum, all work conducted in the PharmaFarm laboratory or in the grow production area shall require footwear that completely covers the foot.
- Chemical spills often result from accidents where containers are dropped onto the floor. The resulting splash and potential for possible broken glassware will be less of a hazard to those wearing full foot covering.
- If there is ever any question as to what level of foot protection to wear, contact your supervisor before beginning work.

Hand Protection

- There are many different types of gloves that provide protection against many different types of chemical hazards.
- These include latex, nitrile, PVA, and PVC gloves.
- There is no one magic glove that protects against all hazards.
- Therefore, check with the MSDS and your supervisor to determine what type of glove should be worn for the hazards you are exposed to.
- Special gloves are required when clearing or cleaning the trimming machine.
- See separate document "Glove Selection/Use"

Material Safety Data Sheet Policy

- A Material Safety Data Sheet (MSDS) will be kept for each hazardous material.
- The MSDS will be the most current one supplied by the manufacturer, importer, or distributor.
- If MSDSs are received directly from the manufacturer or distributor by the requester, the original copy must be forwarded to the Laboratory Supervisor.

- Free samples of hazardous materials received at the facility must have an MSDS forwarded to the Laboratory Supervisor.
- The Laboratory Supervisor will be responsible for maintaining a master list of MSDSs for materials used at PharmaFarm.
- PharmaFarm has an MSDS station that houses all the MSDSs for hazardous materials used onsite.
- The MSDS station is located adjacent to the entry door, when entering the laboratory and in direct proximity to where each material is stored.
- If an MSDS is missing or obviously incomplete, a new one will be requested from the manufacturer, distributor, or importer.
- The Laboratory Supervisor will review incoming MSDSs for new and significant health and safety information.
- They will see that any new information is passed on to the general manager who will then notify the affected employee.
- MSDSs will be made available to all employees for review during each work shift. If an MSDS is not available or a new hazardous material is introduced into the work environment that does not have an MSDS, the Laboratory Supervisor should be notified.

Understanding an MSDS

- The purpose of the MSDS is to provide vital information on health and physical hazards and information for first responders (i.e., First Aid/CPR trained employees).
- The MSDS can be quite technical, a Glossary will be provided for clarification.
- The MSDS must include, at a minimum, all eight of the described sections. Although the style and layout may vary, every section must be complete, even if the item is not applicable (indicated by N/A). There should be no blank spaces!
- Other sources of data on toxic and health effects can be consulted for more complete information. Contact the Laboratory Supervisor if additional information or clarification is needed.

Product Identity

- Identity: The name of the product as it appears on the label. A product may be a mixture of two or more chemicals.
- Manufacturer's Name, Address, and Phone Number: Self-explanatory.
- If the data comes from a source other than the manufacturer, the actual source must be indicated. The date of preparation or revision must be indicated.
- Emergency Telephone Number(s): 24-hour number(s) provided by the manufacturer to supply emergency information (e.g., medical emergencies)
- Chemical Family: The general class of compounds to which the

hazardous material or mixture belongs (e.g., ethers, acids, ketones, solvents). This term does not give you the exact content of the product.

- Chemical Name: The scientific name of the hazardous material. The Chemical Abstract Service (CAS) registry number may also be given for specific chemicals.
- Formula: The chemical formula may be given for single elements and compounds [e.g., sulfur dioxide (SO2), formaldehyde (HCHO)]. This is not the formulation for mixtures.

Hazardous Ingredients

- If the material is a mixture, all hazardous ingredients must be listed. However, ingredients that are not hazardous, or make up less than 1% of the product (less than 0.1% for carcinogens), do not have to be reported.

Exposure Standards, i.e., Threshold Limit Value (THV) and Permissible Exposure Limit (PEL), are included (either in this section or under Health Hazards.)

- The higher the number for a TLV or PEL, the less hazardous the material.
- The percent column is intended to show the approximate percentage by weight or volume of each hazardous ingredient compared to the total weight or volume of the product. Normally, percentages will be listed to the nearest 5%. When the substance constitutes less than 5% of the product, this is indicated.

Physical Data

This section contains important data to help predict the behavior of the material during use. The information provided is for the material as a whole, rather than for each hazardous ingredient. Some physical data communicate the same information. For example, vapor pressure, vapor density, % volatiles, and evaporation rate, all indicate whether vapors are likely to be present, creating a potential breathing or ventilation problem.

Physical Hazard Data

This section is particularly important if you work with solvents, **peroxides**, explosives, metal dusts, or other unstable substances.

- **Flash Point** : The lowest temperature at which the material will ignite.
- **Flammable or Explosive Limits** : The range over which a flammable vapor, when mixed with the proper proportions of air, will flash or explode if ignited.
- **Extinguishing Media:** Indicates what type of fire extinguisher to use.
- **Special Firefighting Procedures:** Special handling procedures, personal protective equipment, and unsuitable firefighting substances should be listed. For example, water should not be used on fires involving reactive metals. General firefighting methods are not

described.

- **Unusual Fire and Explosive Hazards:** Hazards that might occur as a result of overheating or burning of the material, including any chemical reactions or change in chemical form or composition.

Reactivity Data

- This section evaluates the stability and reactivity of the material and lists conditions to avoid or prevent dangerous reactions.
- This information will help you handle and store the material properly.
- **Stability:** A checked box will indicate whether the material is stable or unstable and under what conditions instability occurs.
- **Incompatibility:** Lists materials and conditions to avoid. Such conditions may include extreme temperatures, jarring, or inappropriate storage. This is important in determining what other chemicals the material can be stored/used with.
- **Hazardous Decomposition Products**: A list of the hazardous materials that may be produced through aging or if the material is exposed to burning, oxidation, heating, or certain chemical reactions. The product shelf life should be included, when applicable.

Hazardous Polymerization: Polymerization is a chemical reaction in which two or more molecules of a material combine to form repeating structural units of the original molecule. A hazardous polymerization causes an uncontrolled release of energy (heat). If this reaction can occur, it must be indicated.

Health Hazard Data

- This section discusses health hazards and first aid information. The potential routes of entry into the body --inhalation, skin absorption, and ingestion -- are evaluated. specific short-term (acute) and long-term (chronic) health effects due to overexposure to the identified material are discussed. Signs and symptoms of acute overexposure may include eye irritation, skin rash, or dizziness. Symptoms of chronic overexposure may include cancer (carcinogenicity), birth defects (teratogenicity), or "target organ" damage. Some products cause both short-term and long-term effects.
- Information on exposure standards, such as TLV, PEL, as well as toxicity data may be included here. Carcinogenicity data from the National Toxicology Program (NTP) or the International Agency for Research on Cancer (IARC) may be presented if available. It is important to note that toxicity data from animal studies gives only an estimate of potential human responses. Experimental animals and humans do not always react the same way to the same chemicals.
- Instructions for first aid and emergency procedures for victims of acute inhalation, ingestion, or skin or eye contact must be included. Medical

conditions that can be aggravated by exposure must also be listed.

Handling Precautions

- This section includes appropriate health and safety practices for handling the material, protective measures to be taken during transport, and spill management requirements. Instructions for safe handling and storage, such as the warning not to store acids and bases together, may be given
- Any additional special precautions not addressed elsewhere in the MSDS should also be listed here. These may include instructions for storage life or transportation, such as special packaging or temperature control.
- The information on methods, special equipment, and precautions necessary to control and clean up spills, leaks, and other releases will help you prepare for emergencies. For example, the MSDS may state that respirators are required to clean up a spill. Acceptable waste disposal methods are also described. The user will be alerted to any potential environmental danger to the genera population, crops, water supplies, or other receptors.

General EH&S Training

- All PharmaFarm employees working with, or potentially exposed to, hazardous materials in their work place will be provided with general EH&S training at the time of their initial assignment.
- The Laboratory Supervisor will provide training and will include a discussion of the following:
  - Location and availability of the written EH&S Program (this document).
  - Methods and observation techniques used to determine the presence or release of hazardous materials in the work area (i.e. appearance and odor).
  - Areas in the work area where hazardous substances are used.
  - Use of engineering controls, personal protective equipment, and work practices that can be used to lessen or prevent exposure to these hazardous materials.
  - Emergency and first aid procedures to follow if employees are exposed to hazardous materials.
  - How to read labels and review MSDSs to obtain appropriate hazard information.
  - How to react to a chemical spill, leak, or other exposure.
  - Explanation of employee rights
  - To personally receive information regarding hazardous materials they may be exposed to
  - For their physician to receive information regarding what hazardous materials are used by the employee, specific types of controls used in the work area, and potential for exposure.

Hazardous Substance Information and Training Act

- Employees will sign a form stating they have received EH&S Training and it will be documented in a training log.

SECTION G. PRODUCT AND SITE SAFETY
Sub-Section G.2 Glove Selection And Use Guide

The Right Glove for the Job

Criteria for glove determination;

- Is protection from hazardous chemicals required?
- Are there any concerns for cuts or lacerations?
- Is dexterity crucial to your work?
- Is product protection of utmost importance?

Different glove materials offer different kinds of protection. Because a material's suitability may be affected by either degradation or permeation, both factors must also be considered when selecting appropriate gloves.

- Degradation of one or more of the physical properties of a material due to chemical contact.
- Permeation is the passage of a chemical material or compound even if the material is not susceptible to chemical attack. Permeation can occur even if there is no visible damage to the gloves being worn.
- The selection of appropriate gloves is generally done after consulting one or more chemical degradation guides.
- Protection from sharp blades or other objects
- Protection against transfer of oils or other detrimental elements.

- Protection against heat.

Selection Guide/Table

The following listing will help you understand the various terms used in the guides:

- Natural Rubber: A material (also called latex) that is inherently elastic and resilient, plus resists acids, alkalis, salts and ketones. Natural rubber gloves are traditionally suited for food processing and laboratory chemical handling. **This glove will be available for laboratory, manufacturing and when handling cannabis.**
- Neoprene: A synthetic rubber developed as an oil-resistant substitute for natural rubber. It also resists a broad range of chemicals. Neoprene gloves are used in petrochemical, degreasing and refining applications, and when handling acids, caustics, and solvents. **This glove will be available for laboratory use if required.**
- Nitrile: A synthetic rubber with superior puncture and abrasion resistance in addition to chemical protection. Nitrile gloves are suited for stripping and degreasing, as well as acid etching and chemical washing. . **This glove will be available for heavy-duty cleaning.**
- PVC: Also known as polyvinyl chloride or vinyl, PVC is a plastic material that resists acids and alcohols, but not petroleum products. Vinyl gloves are used food processing, laboratory, research, and pharmaceutical. **This will be the primary glove worn by any team member who may have an allergenic reaction to latex.**
- PVC Double Dip Chemical Resistant Shoulder Length: This is a thicker glove. **This will be used for cleaning the trimming equipment.**
- Cotton Glove with Latex Palms: **For handling lamps and lamp replacement.**
- Kitchen: Withstands extreme heat up to 482 degrees F. Anti-slip silicon grips, wrist and forearm protection. Fire resistant aramid fibers construct. **For oven and baking use.**

SECTION G. PRODUCT AND SITE SAFETY
Sub-Section G.2. Evacuation Procedure Plan

GENERAL PHARMAFARM EVACUATION PROCEDURES

- Shut off all equipment and hang up all phones. Any equipment, which could be dangerous if left unattended, should be made safe as quickly as possible.
- If your personal belongings (e.g., car keys, purse, coat) are nearby, take them with you outside the building since there may be times when you will not be allowed back into the building for an extended period of time (e.g., earthquake). Otherwise, do not stop to collect any personal belongings before leaving the building.
- Proceed to the nearest safe exit via evacuation routes as directed the Fire Warden or Management. Be sure to close all doors as you exit.
- Assist any employees with special needs and escort any visitors out of the building.
- Once outside the building, proceed directly to the designated assembly area. The Fire Warden or Management will do a roll call. If you do not hear your name, give your name to the Fire Warden or management. Limit conversations so that headcount may be taken efficiently.
- Remain in the assembly area until otherwise instructed. Do not block access

roads or parking lots, which may need to be used by emergency vehicles.
- Do not make any statements to the news media or to anyone who is not officially responsible for responding to the emergency.

ADDITIONAL EVACUATION PROCEDURES IN CASE OF FIRE

- If smoke is present, employees should stay low and avoid breathing the smoke. If necessary, crawl on hands and knees to nearest emergency exit.

FIRE WARDEN PROCEDURES

- When the alarm sounds, immediately take the orange vest and the clipboard with employee roster.
- The orange vest, the clipboard with the employee roster should be kept in a box mounted on a wall close to the lobby exit so that an alternate can easily find these items.
- Quickly go to the assigned assembly area. Put on the orange vest when you get there, or in route.
- As employees arrive at the assembly area, check off their names. If necessary, conduct a roll call. Roll calls must be taken in an authoritative manner. If you have any additional people (contractors, temporary workers, etc.) in the area who are not on your roster, write their names down on your list.
- Immediately report missing or trapped employees, or information regarding other problems to Senior Management or emergency personnel.
- When it is safe to reenter the building you will be notified by one of the following: The Fire Department or Senior Management.
  Then and only then, instruct those in the assembly area to reenter the building.

Section G PRODUCT AND SITE SAFETY
Sub-Section G.2 FIRE PREVENTION PLAN

OVERVIEW
All reports of fire or smoke are considered real and will receive a full emergency response. This plan outlines potential fire hazards and fire protection equipment, and provides response procedures for employees when they encounter fire or smoke.

This Fire Prevention Plan is written in compliance with U.S. OSHA regulations. This plan covers the following:

- Responsibilities of employees in regards to this plan
- Potential fire hazards at PharmaFarm
- The methods of storage for fire hazards
- The types of fire control equipment at PharmaFarm

RESPONSIBILITIES
Senior Management has the ultimate responsibility for the health and safety of employees working at PharmaFarm.
The Fire Warden Committee has been assigned by senior management with the responsibilities to implement and maintain this Fire Prevention Plan.

All employees are responsible for the following:

- Knowing the location of the nearest emergency exits and the location of their assigned emergency evacuation assembly areas at all times while at PharmaFarm.
- Immediately reporting the discovery of potential fire hazards to their managers.
- Knowing how to report the discovery of smoke or fire (CALL 911 from the office phone).

Managers who supervise other associates have the ultimate responsibility to see that their areas are free of fire hazards. Responsibilities include:

- Periodic safety inspections are made by designated representatives, and corrective action will be taken as necessary.
- Maintaining good housekeeping by keeping the accumulation of combustible materials under control.
- Responding to reports of frayed electrical cords or overloaded circuits.
- Supplying materials for the proper storage of flammable materials, including cylinders.

REPORTING THE DISCOVERY OF SMOKE OR FIRE

1). Any discovery of smoke or small fires is to be immediately reported to a member of the Fire Warden Committee or management. If no one on he Fire Warden Committee or management is immediately available, the discovery of smoke or small fires should be immediately reported by dialing - 911 on an office phone. If there is any concern that the smoke or fire may be or become hazardous, call 911 immediately before seeking out a member of the Fire Warden Committee or management.

2). Discoveries of large fires are to be immediately reported by dialing 911, and require an emergency evacuation of the facility.

3). Never enter a smoke filled room to investigate the presence of fire. Call 911.

POTENTIAL FIRE HAZARDS AND CONTROL MEASURES

COMBUSTIBLE MATERIALS

1). Items such as boxes, paper, wood or other debris are combustible. The control of these types of materials is accomplished through periodic safety inspections. These inspections are documented by a member of the Fire Warden Committee.

2). Good housekeeping at PharmaFarm is designed to keep the accumulation of these materials to a minimum and includes:

- Keep accumulation of old papers, files and unwanted materials to a minimum.
- Do not store combustible materials in any exit corridor.

- Keep the doors to rooms that house combustible materials closed.
- Do not use portable heaters in close proximity to combustible materials.
- Portable heaters are not to be used without consent from the Senior Management.

FLAMMABLE CHEMICALS

These include items such as lab solvents and facilities cleaning and maintenance compounds. The control of these types of fire hazards is accomplished through periodic safety inspections that are documented by a member of the Fire Warden Committee. To reduce the hazard from materials, the following should be observed:

- Flammable chemicals are stored in either the appropriate cabinets or secondarily contained.
- Do not exceed the volume limits of the approved cabinets.
- Storage of flammable chemicals outside of approved storage cabinets should be limited to 1-liter containers.
- Keep containers closed when not in use.
- Storage areas are posted as Flammable Areas
- No smoking is permitted anywhere.

ELECTRICAL CORDS AND OUTLETS

The control of electrical cord and outlets types of fire hazards is accomplished through periodic safety inspections. These inspections are documented by a member of the Fire Warden Committee. To reduce the hazard from electrical cords and outlets, the following should be observed:

- Do not use frayed or taped electrical cords, do not overload electrical outlets.
- Keep electrical cords out of heavy traffic areas.
- Do not use extension cords. Power strips with surge protectors are allowed.
- Do not plug a power strip into another power strip to extend the length.
- Maintain 36” of clearance around electrical boxes at all times.

FIRE PROTECTION EQUIPMENT

1). Fire Warden Committee or their designee ensures that adequate fire protection equipment is provided in each area and is routinely inspected. Only trained and authorized Safety Committee members use the fire extinguishers; all other employees must evacuate the area.

2). Fire extinguishers are located throughout the PharmaFarm facility as required by law. Each fire extinguisher location designated by a sign.

ALARM SYSTEMS

1). Our facility fire alarm systems are designed to alert inhabitants of a fire, and to expedite notification of the local Fire Department. PharmaFarm building alarm systems are equipped with horns and strobes. The Fire Warden Committee or their designee ensures that a fire alarm system has adequate coverage and is in operating condition at all times.

2). Testing of the alarm system is conducted by the vendor at least annually.
3). Employee evacuation drills are conducted at least twice annually.

FIRE SPRINKLER SYSTEM
PharmaFarm has a fire sprinkler systems. These systems are automated systems that are activated by the presence of a fire. All sprinkler heads must have a minimum of 18" clearance at all times.

TRAINING
Training relevant to the PharmaFarm Fire Prevention Program is provided to employees as part of our New Hire Safety Orientation Training. Training provides the following types of information:

- information concerning the responses to fire
- the location of emergency equipment and
- the emergency evacuation procedures.

New Hire Safety Orientation Training is managed by the Fire Warden Committee.

SECTION H. MARIJUANA TRANSPORT

VEHICLE TYPE, REQUIREMENTS and EQUIPMENT
The cargo transit vehicle;

- There will be no signage on the vehicle suggesting the transport of cannabis products.
- Shall be a new or certified late model SUV, van or similar with large cargo area. Windows will be tinted within the legal limits of the law.
- Shall be well maintained on a regular basis to insure there is minimal chance of breakdown while in transit and to insure safe operation for the occupants.
- Will be equipped with high-quality all season tires and with four-wheel drive.
- Shall have temperature control capabilities to maintain the proper medication temperature storage area during transport.
- Will have a separately secured and locked storage area located within the vehicle.
- Shall be equipped with secured cell phone and direct connect capabilities to communicate with the office or if necessary, the police.

Pre-programmed dispensary phone numbers will also be on the phone's contact list.

- Will have a secured GPS system with a real time, web-based tracking system for constant vehicle monitoring by location and time with record keeping capabilities from the main office.
- Shall be fully alarmed and with a no-start security system tied to an electronic key access system.

TRANSIT PROGRAM

EMPLOYEE STEPS REQUIRED PRIOR TO TRANSPORT

1). Office Manager/Bookkeeper
   - Receives order from the dispensary or PharmaFarm marketing associate.
   - Begins process of filling out the Shipping Manifest and the In-House Order Form. (See In-House Order Form Draft below.)
   - Once the information is completed, Shipping Manifest and In-House Order Form and one (1) copy of both is placed into an manifest-numbered file folder and it is moved to the General Manager.

2). General Manager
   - Receives Shipping Manifest and In-House Order Form from the bookkeeper and retains copy of Shipping Manifest and In-House Order Form.
   - Meets with Lead Grower to review order and sign-off to approve shipment. Signature line is on the In-House Order Form.
   - Both the copy of Shipping Manifest and the In-House Order Form will be left with General Manager for follow-up. Both the original In-House Order Form and original Shipping Manifest are then moved to the Lead Grower.

3). Lead Grower
   - Assembles the Manifest Shipping order from the vault.
   - Once assembled, order is physically reviewed with General Manager prior to sealing of box(s) for shipment.
   - Lead Grower and General Manager sign In-House Order Form verifying contents in box(s). Box(s) are sealed with both present.
   - Shipping Manifest number is written on each box being sealed.
   - Shipping Manifest and In-House Order Form is attached to the box and placed back into the locked vault until ship date.

PROCEDURAL REQUIREMENTS PRIOR TO TRANSPORT

- A Department of Consumer Protection supplied Shipping Manifest form must be fully and completely filled-out.
- A copy of the manifest must be securely transmitted to;
   1). The Department of Consumer Protection

2). The Dispensary receiving the shipment.

- The Shipping Manifest must be transmitted at least twenty-four hours prior to transport.
- A copy of both the Shipping Manifest and In-House Order Form must be retained on file in the bookkeepers office in its original file folder when completed.
- These file folders must be maintained by dispensary account and will be cross referenced by serial number and electronically entered for accounting and bookkeeping requirements.
- If the Shipping Manifest is pre-numbered, any mistakes must be maintained in a separate file marked "Voided Shipping Manifests."
- Two authorized signatures are required whenever;
  1). Verifying an order prior to sealing the box(s) being shipped.
  2). Anytime material is being removed from the safe for shipment.
- The dispensary will be called the day before the shipment to remind them the shipment is coming and a projected time of delivery.
- A pre-programmed navigational system will be supplied for each delivery. It will be changed by route randomly and weekly.

PROCEDURAL REQUIREMENTS FOR DAY OF TRANSPORT
Pre-Departure

- A weekly calendar of shipping requirements will be maintained and posted in the shipping area by the office.
- The Shipping Manifest number and number of the shipping box will be matched and verified by the Lead Grower and General Manager.
- For each Shipping Manifest completed, the General Manager and Lead Grower will sign-off on the corresponding In-House Order From. This form when completed is to be returned to the bookkeeper.
- All Shipping Manifests will be collected and placed on a clipboard.
- All products to be shipped will be moved to the loading dock area from the vault under General Manager and Lead Grower supervision.
- Driver will retrieve preprogrammed GPS device from the office to place in vehicle and vehicle keys.
- With security present on the loading dock, the loading dock door will be opened and the vehicle will be moved into the loading dock area and the engine turned off.
- Connect exhaust vent to vehicle exhaust pipe, insure fan is operational.
- The accordion door separating the transport staging area will be closed.
- The loading dock door will be closed.
- All products will be loaded into the vehicle under both General Manager and or Lead Grower supervision.
- Each item will be actually loaded into the vehicle by both the driver and driver's sentinel companion.

- As each item is loaded, the Shipping Manifest will be checked against each item being loaded by the driver and sentinel. Security of packaging will also be checked.
- Once the entire process is finished, a clipboard will be handed to the sentinel with all the Shipping Manifest's for the Dispensary deliveries.
- The driver will start the engine and with the sentinel, verify;
    1). Enough gas in the vehicle
    2). Tires properly filled
    3). Engine running smoothly
    4). Left and right, front and back blinker working
    5). Lights working, front, back, brake
    6). Windshield wipers working
    7). GPS navigational device and cell phone working
    8). Insure the interior storage area is locked.
    9). Check that you have your driver's license and department–issued identification card.
- Sentinel boards vehicle, all doors locked, vehicle proceeds once loading dock door is reopened and the "all clear" indication is given by security. This includes removal of exhaust vent. The loading dock is reclosed by security.

Dispensary Arrival

- A scheduled time and date will be made with the dispensary prior to the delivery being made. It is imperative that this appointment be met unless there are extenuating circumstances including heavy traffic, bad weather, mechanical failure or other.
- If the delivery is going to be more than 15 minutes late, the driver's sentinel must contact the office immediately.
- Upon arriving at any dispensary location and once parked, take a moment and observe your surroundings for any suspicious activity. If any is noted, call the office immediately for guidance. Do not leave the vehicle until you are authorized by the office to do so.
- Once the location has been visually secured, call the Dispensary and ask for the contact person on the Shipping Manifest.
- Do not allow the engine to idle during the delivery process. It creates unnecessary harmful pollution and expense.
- Inform the Dispensary that you have arrived and are ready to make the delivery.
- Each Dispensary may have different delivery requirements. They will be noted on the Shipping Manifest. The office will insure that you will have any procedural requirements in advance of the delivery for each dispensary.
- Do not unlock or unload the vehicle until the Dispensary informs you that they are ready to physically receive the order.
- Only the driver or driver's sentinel exits the vehicle with the proper Shipping Manifest. **NEVER SHOULD BOTH EXIT BY STATE REGULATION.**

- The person exiting the vehicle makes entry into the secured storage area and using the manifest pulls the correct box(s) for delivery matching the numbers on the box(s) with the Shipping Manifest number.
- The storage area is then relocked and the delivery is made.
- Upon entering the Dispensary, the delivered box(s) must be opened by the Dispensary and verified against the Shipping Manifest.
- EVERY ITEM, COUNT AND WEIGHT MUST BE VERIFIED against the Shipping Manifest and when the process is completed, the Shipping Manifest is to be signed by the authorized Dispensary representative.
- Any problems with the Shipping Manifest and order delivery must be addressed immediately before leaving the Dispensary.
- In the event there is a discrepancy with the product or any problem, have the Dispensary call the office directly before you depart the dispensary. Once that communication is finished, the office will ask for you and will advise you on how to proceed.
- An item being returned or rejected may require the filing of an Reportable Event incident required by the state, which will be initiated by the office.
- A copy of the Shipping Manifest must be left with the dispensary.
- A copy of the Shipping Manifest must be returned to the office.
- Once the delivery is completed, the person making the delivery returns to the vehicle notifies the other person in the vehicle they are finished and ready to make entry back into the vehicle.
- Prior to opening the vehicle doors, the person in the vehicle will check the immediate area and all rear view mirrors to be sure there is no suspicious activity around the vehicle.
- Once secured, open the vehicle doors. Entry is made, relock doors and proceed to next location to repeat process until all deliveries are completed.
- If you have any concerns or questions prior to, during, or after the transportation or delivery, always call the office for consultation and direction.

DRIVER TRANSPORT PROCEDURAL TRAINING

These procedures are designed to insure the safe and secure transportation of medicinal cannabis medication throughout the state of Connecticut. It is critical that these procedures be followed to the letter. This will insure that we are always in legal compliance with the State of Connecticut and that the patient's supply of medication is uninterrupted.

As our driver, you are an integral part of our team and truly the conduit of compassion from our grow farm to the dispensary and ultimately to the patient.

You represent the company and as our ambassador, you are the one who can create a positive or negative impression with the dispensaries and communities we service.

The following procedures and rules are the key to a successful distribution channel and logistics program for medicinal cannabis.

As part of your training program, and after you carefully read these procedures, the General Manager will;

- sit with you to review the information all the information contained here within in detail. Please ask any questions that you may have.
- drive with you on all first-time dispensary delivery and review the step by step procedures as outlined and adjust if required for any special dispensary needs or requirements.

1). EMPLOYMENT REQUIREMENTS

- A valid State of Connecticut driver's license with clean driving record. A copy of your driver's license and other information will be required to conduct a background check for DUI's, substance abuse issues, moving violations and criminal convictions.
- Instances of these may adversely affect your chances of working in this position due to the handling of controlled substances.
- Additionally the Department of Consumer Protection will require that all PharmFarm employees be approved by the state with a department-issued identification card.
- The department-issued identification card must in the driver's possession when transporting or delivery cannabis and shall produce it to the commissioner, the commissioner's authorized representative or law enforcement official upon request.

2). DELIVERY NAVIGATION

- A GPS-based navigation system will be supplied and programmed by management for each delivery.
- These trips will be timed and routed randomly by management.
- ALL pre-programmed routes must be followed implicitly.
- This system will track the vehicle at all times and keep a time record of all trips.

3). COMMUNICATIONS

- A cell phone with direct connect intercom will be supplied by the office and is to be used only for necessary company communications and emergencies.
- **WHILE THE VEHICLE IS MOVING ONLY THE REQUIRED ACCOMPANYING PASSENGER MAY USE THE CELL PHONE.**

- The cellphone may not be used to make any personal, non-business calls, personal texting or tweeting.
- Personal cell phones may not be used while in transport of medical cannabis.

4). ACCIDENT MANAGEMENT

- If you are not seriously injured please call the office immediately with your location.
- We will notify the insurance company and we will contact the police in the immediate vicinity and inform them of the accident and the cargo on board.
- If the police are already on the scene before you can call the office, inform them of the controlled substances on board and have them contact our office immediately.
- **If you are seriously injured, before you call anyone, including this office, call 911, then call the office.**
- **Whenever possible, never leave the vehicle unattended unless a police officer is on the scene and has been notified of the contents in the vehicle.**

5). REFUELING THE VEHICLE

- The vehicle will be refueled on a regularly scheduled basis unless delivery schedules dictate otherwise
- Fuel will be paid for by company credit card at a specifically identified gas station.
- The credit card will be picked-up and returned to bookkeeper for each use.
- Always be sure a receipt is obtained when gas is purchased and that the receipt is returned with the card, to the office
- **<u>Never fill the vehicle with gas if it is carrying medicinal cannabis.</u>**
- **ALWAYS CHECK THE VEHICLE'S SECURED STORAGE AREA AS A MATTER OF PRACTICE WHEN ENTERING THE VEHICLE TO INSURE IT IS EMPTY.**

6). SHIPPING MANIFEST

It is anticipated that a copy of the shipping manifest will travel with each shipment. This document;

- Will be given to you on clip board
- The manifest number on the shipping manifest will appear on all boxes to be delivered to a particular dispensary.
- For each delivery, each box must be carefully checked to insure the manifest numbers are correct. this must be carefully checked.

7). TRAVEL SPEED

- NEVER EXCEED THE SPEED LIMIT when driving this vehicle.

- We only want you to drive the speed limit. Speeding tickets are your responsibility to pay but our insurance rates go up.
- More importantly we are about safety first and we do not want you to get hurt.
- The vehicle is equipped with tracking software and hardware to monitor location, speed and time. Please drive accordingly.

8). MECHANICAL VEHICLE FAILURE

- In the event of a mechanical failure of the vehicle or a flat tire, do not leave the vehicle. Immediately call the office, we will advise you on what the next steps are

9). VEHICLE MAINTENANCE

- The vehicle will require periodical maintenance. You may be required to take the vehicle to the company's authorized repair shop for service.
- In the event of any issues noticed during driving, please report them to the bookkeeper immediately and if necessary, while in transit.
- **ALWAYS CHECK THE VEHICLE'S SECURED STORAGE AREA AS A MATTER OF PRACTICE WHEN ENTERING THE VEHICLE TO INSURE IT IS EMPTY.**

10). OUT OF STATE TRIPS

- Out-of-state trips will not be common but may be required for picking up supplies.
- THE VEHICLE CAN NOT CROSS STATE LINES IF IT IS CARRYING MEDICINAL CANNABIS.
- **ALWAYS CHECK THE VEHICLE'S SECURED STORAGE AREA AS A MATTER OF PRACTICE WHEN ENTERING OR LEAVING THE VEHICLE TO INSURE IT IS EMPTY.**

11). ROBBERY

- Always keep your eye's and ear's open and be aware of your surroundings.
- If someone is attempting to rob you or the vehicle, DO NOT RESIST.
- Give them what they want without hesitation. We can always replace the medicine but we can never replace you.
- After the robbery, call 911 immediately and then call the office.
- Stay where you are, until the police arrive and do not disturb the crime scene.

12). CASH HANDLING

- You may be required to carry dispensary payments to the office or to the bank.

- See “Cash Handling Procedures” for proper and secure method of handling cash.

13). LEAVING THE VEHICLE

- As in the case of a dispensary delivery, either the driver or the driver’s sentinel must stay in the vehicle at all times.
- The vehicle should remain locked at all times during transit or when stopped and relocked upon opening for exit or entry immediately.
- The PharmaFarm office must always be notified when the vehicle is stopping for a delivery (See “PROCEDURAL REQUIREMENTS FOR DAY OF TRANSPORT, Arrival” for details.)
- Exiting the vehicle for bathroom use requires that you first check in with the office prior to stopping.
- No delivery will route will require more than 3-4 hours in transit. All bathroom use should be considered before or after the delivery schedule is completed whenever possible.
- No regulations have been established for driver use of dispensary bathrooms. Currently it is not allowed.

14). DELIVERY SCHEDULE

- There will be an AM delivery schedule and if necessary a PM delivery depending on dispensary hours and needs.
- Weekly schedules will be posted in the loading dock area.

15). LUNCH

- All delivery routing will include a return to the PharmFarm facility in time for lunch.
- Never stop for lunch with the company vehicle unless on company business and never with medicinal cannabis in the vehicle.

16). LAW ENFORCEMENT

- Law enforcement authorities will be notified prior to the transportation of any medicinal cannabis and given all relevant information as necessary.
- Any time you are pulled over by law enforcement, the driver’s sentinel should notify the office immediately by cell phone.
- Always be professional and polite. They are on our team.

Never hesitate to ask any questions about anything that you may not fully and completely understand. The importance of following these rules is critical to your success and the success of the company.

PHARMAFARM IN-HOUSE ORDER FORM

ORDER INFORMATION

Date of Order _____ Manifest # _____ Filed By_____

Delivery Date _____ Dispensary _____

Ordered by _____ Phone# _____

ORDER

Amount	Item	Lot#/Batch#/Serial #
_____	_____	_____/_____/_____

_____	_____	_____/	_____/ _____
_____	_____	_____/	_____/ _____
_____	_____	_____/	_____/ _____
_____	_____	_____/	_____/ _____
_____	_____	_____/	_____/ _____

GENERAL MANAGER APPROVAL _____

VERIFICATION & PACKAGE SEALING Date Verified _____

_____ _____
Lead Grower (print name) (signature)

_____ _____
General Manager (print name) (signature)

SHIPPING Date Shipped _____

Released from Vault for Shipping by

_____ _____
Lead Grower (print name) (signature)

_____ _____
General Manager (print name) (signature)

RETURN THIS FORM TO THE BOOKKEEPER ONCE SHIPMENT IS COMPLETED

5/13

Section I BONUS POINTS
Sub-Section I.1 – Employee Working Environment Plan
Wage Standards, Personal, Health, and Educational Benefits

Employee Wage Standards

- Grow and Manufacturing Team Members the largest employee staff by PharmaFarm job description, has a average forecasted annual starting salary of $38,500 per team member per 40 hour week.
- Overtime for non-management employees will be paid at 1.5 times his/her normal hourly rate after 40 hours are exceeded in any given work week.

- For other salaries ranges, see Section C. Proposed Business Plan.
- Salary increases will not be automatic. A review process will take occur every six months with the employees' supervisor and the general manager.
- Salary increases will be based upon but not limited to;
    - Work performance and work ethic, honesty and integrity
    - Absences and tardiness.
    - An ongoing desire to improve oneself and the company.
    - Positive attitude and approach towards daily functions and the overall PharmaFarm working atmosphere.
    - Team player and ability to work with and help others.
    - Being totally responsible to all PharmaFarm and Department of Consumer Protection rules and regulations.

Healthcare and Wellness Benefits

- PharmaFarm employees will have access to the Walk-In Center of Wallingford at 863 North Main St. Extension. The company will have an account at the Walk-In Center and employees will be able to access the benefits of that account including;
    - Instant credit approval upon employment verification.
    - Priority service, as needed.
    - Vaccinations and other pro-active programs.
    - Reduce rates.
- Twice daily (AM and PM), all the employees will participate in a company sponsored fifteen-minute break. This will be to train the employee and for he/she to become proficient in the Eastern Medicine, energy-healing modality Qigong. This daily regime of personal energy management will yield personal and company benefits including;
    - Supporting a healthy flow of energy through the neuro-pathway for improved balance, body movement and overall performance.
    - Reducing the risk for accidents from lifting, bending and other lower back and other muscular stress points.
    - Increased energy and focus.
    - Improved mental attitude and stress reduction.
    - Energy synchronization for cannabis plant health.
- A PharmaFarm Health Insurance Program will be offered to all employees after 3 months of successful employment, the ending of the new hire final probationary period. PharmaFarm will make a monthly contribution of $600.00 per employee towards the cost of the Company-sponsored healthcare program.
- Company healthcare contributions will be increased annually for all employees.

Employee Work Environment Enhancement

- A weekly informational and team-building breakfast meeting.
- The employee break area will include a refrigerator, microwave, sink, hot water/coffee maker and spring water dispenser. The area will be company supplied with coffee, tea, decaffeinated coffee and tea, hot chocolate, herbal mate' and the necessary condiments.
- The employee break area will be company maintained with healthy and nutritious snacks including nutritional bars, fresh fruit, nuts, dried fruit and low/no sugar cold beverages.
- An annual holiday party hosted for all employees and their guest. A catered event with both employee-performed and professional entertainment. Gifts for all children of employees of PharmaFarm.
- All employees will have opportunities to participate in the company's employee stock program based on merit or other. Employee stock opportunities, as directed by the Company's Board of Directors' may be based on;
    - Employee of the Month and Year Award
    - Employee Special Achievement Award
    - 5 Year Employment Award
    - 10 Year Employment Award
    - 15 Year Employment Award
    - Employee Discount Purchase
    - One-time Occasions or Events
- Family and medical need (see PharmaFarm Employee Handbook.)
- Paid holidays (See PharmaFarm Employee Handbook.)
- Three (3) paid Personal Days and (2) paid Sick Days.
- One (1) week vacation pay after one (1) year full-time employment. Two (2) weeks vacation pay after two (2) years full-time employment.
- Leave of Absence (see Employee Handbook for details.)
    - Bereavement
    - Military Leave
    - Jury Duty
    - Voting Leave
    - School Activities Leave
    - Discretionary (Personal) Leave of Absence
    - Family Care and Medical Leave
    - Pregnancy Leave
    - Serious Health Condition
    - Leave to Care for Employee's Child after birth or adoption.

Employee Educational Programs

- Employees will have the opportunity to participate in on-going medicinal cannabis educational events and programs. These included but are not limited to;
    - Industry tradeshows.

- Medical programs for disease specific treatments, the endocannibinoid and other cannabis-related patient oriented programming
- Innovations in propagation, strain development and in grow technology.
- An international exchange program to work in other grow facilities to study cannabis agricultural techniques and processes.
- Related classes designed to improved skill sets and knowledge in any relevant areas of the medicinal cannabis industry.
- Guest speakers for in-house presentations on cutting-edge cannabis growing information and application.

PHARMAFARM

Employee Handbook

"EXCELLENCE IN
MEDICINAL CANNABIS"

What Grows in Connecticut, Stays in Connecticut

2014

EMPLOYEE RULES & REGULATIONS

Welcome To Our Team (Name of Employee)

We welcome you to PharmaFarm. The first thing we want you to understand is that our business is all about the patients we serve. With that we recognize that our

associates on our team – you, are one of our most valuable resources in achieving that patient driven goal.

Our success in providing the highest quality pharmaceutical grade medicine at a very affordable price, depends on people like you and your fellow associates. We want you to work hard, be passionate about your work, enjoy the time you spend on the job with the team and most importantly we want you to know you are helping hundreds of patients who are in need of this medication.

We have prepared this handbook so that you have a clear understanding of the rules and policies of PharmaFarm. It is imperative that you follow each rule to the letter, otherwise you could be terminated.

Please take the time to read this handbook thoroughly. Any questions, please write them down so you can ask. You will be required to undergo an orientation and training period and at that time, this entire document will be reviewed.

We hope your find your employment with us rewarding and enjoyable as together we assistant these patients while make a difference in their lives.

Sincerely,

(Signed)

David Kimmel
President

OUR MISSION

Vintage Foods Ltd's mission is to establish itself as a branded innovator and leader in the medicinal cannabis industry in the state of Connecticut. The company specializes in the production of pharmaceutical grade cannabis material for oral, topical, trans-dermal, sublingual and vaporization delivery systems. In addition the company is focused on the research and development of non-psychotropic cannabis strains, cannabinoid, terpenoid and flavonoid development, metered unit dosing and standardization of whole plant material for state-specific disease treatments and safe, patient-friendly delivery systems.

HOW WE DO OUR BUSINESS

Our success depends on the people we work with. Our farm can only prosper and provide opportunities for employment, growth and the best pharmaceutical grade medicinal cannabis possible when we continually improve ourselves, and the work we do.

We recognize success is not measured by numbers alone. We are measured as much by the way in which we achieve our patient goals, as we are by the actual achievements themselves. We believe that a commitment to uncompromising values and integrity should always guide our decisions and actions as we pursue our goals. The following are the core values that form the foundation of our measurement of success:

- We believe in providing legendary quality and service. Every thing we do must embrace this philosophy.

- Good isn't good enough. We never stop trying to do it better, even if only in baby steps, no matter how good we think we are. We constantly want to strive to raise the bar in medication efficacy, metered dosing and patient friendly delivery systems.

- Trust and integrity are everything. If we can not completely trust you and you completely trust us, our relationship together will go no where. Take personal accountability for all of your actions.

- Ongoing training and development of your skill sets is important. We see you as an asset to the company and want you to grow as the company grows. Enabling you to achieve you potential will only help the company.

- Real success depends on real teamwork. We know that great achievements are possibly when we work together and never ever allow the words "not my job" to pass your lips.

- PharmaFarm must be keep impeccably clean at all times. This is important to prevent mold, bacteria, infestation and any other issue that could affect the quality and safety of our medication...

- Professionalism is critical. While we promote a more casual work environment, we expect you stay focused and behavior in a manner that is indicative of a professional pharmaceutical manufacturing facility.

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ABOUT THIS HANDBOOK

This handbook is designed to help you become familiar with PharmaFarm and its operational rules and regulations. A message that you will hear frequently is **"FOLLOW THE RULES**" and we can't be any more specific. You are handling a controlled substance and you must behave accordingly by Vintage Foods law and Connecticut State law.

The policies stated in this handbook may change from time to time and when that does occur, the new policy will be distributed and explained in the weekly team meeting.

This handbook is not a contract which guarantees your employment, it is to spell out the rules and regulations of the company so your can both easily understand them and follow them.

We wish you the best of luck in your position and welcome to PharmaFarm.
Again, welcome our team!

ABSENCES

All employees are expected to work on a regular, consistent basis and complete their regularly scheduled shifts each week. Excessive absenteeism may result in disciplinary action, up to and including termination. Disciplinary action taken because of absenteeism will be considered on an individual basis, following a review of the employee's absentee and overall work record.

If you are going to be late or miss work, employees are expected to call and <u>talk to</u> the Lead Grower at least 2 hours before you are scheduled to work.
Any employee who does not call or report to work for two consecutive shifts will be considered to have voluntarily resigned employment.

Prior to taking a leave of absence for purposes of vacation, personal leave, military or jury duty**,** or other planned absence, an Employee Leave Request must be made. An Employee Leave Request shall be submitted via email to (TBA) or in writing to the Lead Grower and consist of a name, dates requested off, and the reason for the request.

Employee Leave Requests should be submitted at least four weeks prior to the scheduled leave date, unless the request is due to an unexpected emergency or other immediate need. The nature of the emergency or need should then be shared with the Lead Grower immediately.

During the busiest times of the month please do not request any time off whenever possible. Unless the reasons are compelling, your request will be denied.
To return to work from an accident or medical leave, all employees must present a doctor's release.

Any employee who fails to return to work at the expiration of a personal leave of absence will be deemed to have abandoned their job, unless PharmaFarm is notified of a reason, satisfactory to management, for not returning to work at the end of the leave of absence.

If you are calling in sick, please give us as much notice so that we may cover your shift.

Each employee after working:	6 Months	1 Year
	1 Personal Day	3 Personal Days
	1 Sick Days	2 Sick Days

AGE REQUIREMENTS

All employees as per CT law, must be at least 18 years of age and in many cases 21 years of age due to the nature of the medicine and its classification as a controlled substance. Employees under the age of 21 years **can not** handle any cannabis medicine without management supervision.

BATHROOMS

Whenever using the bathroom, you must carefully wash you hands prior to returning to any work area. Always let management know when bathroom supplies are needed. If you are on shift and need to use the bathroom, please notify management that you are leaving the grow room floor. Please remember we all use the same bathroom and good sanitation practice's, rule the day.

Security will be required sign you in and out of the grow area when using the bathroom (or anytime you exit or enter the grow area.)

BACKGROUND CHECKS AND LAW ENFORCEMENT

By requirement of CT law, background checks are conducted on all new employees. During your employment with PharmaFarm **any** new issues with law enforcement must be immediately disclosed to your manager. This would include but not be limited to:

1). Substance abuse or controlled substance issues
2). DUI's or any other traffic violations that rise to more than 2 points on your license
3). Any law enforcement issues that requires court appearance.

Please note the company will randomly continue to do background checks on all employees, regardless of their length of employment with our company.

BREAK TIME

Associates will have two ten-minute break times during their shift. These breaks will not be scheduled to a specific time but will occur once during the mid-morning and once during the mid-afternoon. The manager will notify the team when the break is being taken.

CANNABIS DISPOSAL PROCEDURES

All cannabis products, by-products, waste including stalks and stems and any other cannabis materials must always be tracked and accounted for. This company and state rule is imperative and must be fully adhered to and without question. Not following these rules will result in termination. This also includes any products that are going to be disposed of either due to poor quality, expired use date, infestation or any other reason. You will be carefully trained in this rules and procedures.

CELL PHONE USAGE

Cellular phones can only be used in the associate break area and phones must be left in your locker while working. Flexibility for cell phone use during working hours will be permissible only in situations with prior manager approval.

COMMUNICATION

It is important for every employee to have a good sense of "what's going on" at PharmaFarm. It is management's responsibility to keep everyone informed of ongoing changes and news affecting our team. Such communication will take place in our weekly meetings and by posting notices and other information on our News Board located for easy visibility in the associates break area.

CONFLICT OF INTEREST

Employees are prohibited from engaging in conduct that presents a conflict of interest. This information is fully covered under the PharmaFarm Code of Ethics which will be part of your training program.

DISABILITIES

Under the Americans Disabilities Act, employers cannot discriminate based on a physical or mental impairment or request an employee's medical records. Businesses can, however, inquire about an applicant's ability to perform specific job duties.

DISASTER TRAINING

Planning and on-going associate training will be conducted using FEMA standards to address a number of potential disasters. You are required to be present for all of these ongoing training programs in order to continue your employment at PharmaFarm. You will be compensated for all meeting time if the meeting occurs doing your non-working hours.

The following information is an overview of what you will be trained in and responsible for. Quarterly Associate Training and Educational Presentations will be made and all new associates will be trained in emergency disaster procedures.

Also understand that all of this training will be coordinated with local town, state and national standards and they must be followed to the letter in the event of an disaster. Emergency drills will be conducted on a regular basis for a variety a hypothetical reasons. **Please take these drills seriously.**

DRESS CODE and PERSONAL HYGIENE

We understand that each person's dress style is an expression of their personality. We like your personality otherwise we wouldn't have hired you. However we do require certain standards of dress in order to satisfy city, state, and federal regulations as well as commonly accepted professional forms of attire (see "Uniforms" below.)

Shoes

- Shoes must be close-toed and have non-skid soles.
- Socks are required.
- Work shoes must be left at work in your locker to prohibit the tracking in of any unwanted bacterial hitchhikers from the outside.

Hygiene

- Always wash your hands thoroughly after eating, using the restrooms, smoking, coughing, sneezing or touching your hair, face or mouth. Always be sure you dry your hands well after washing.
- When you cough or sneeze, do so into your sleeve to minimize the spread of bacteria, if you are wearing gloves, change them, if you are not wearing gloves, wash your hands immediately and thoroughly.
- Clean and well groomed hair is required and Hair must be pulled back off the shoulder and with hair net over.
- No nail polish is allowed, for concern of chipping into the medication.
- Facial hair should be neat and well trimmed and may require the wearing of a facial hair net.
- If you have a cut or wound, make sure it is completely covered by a waterproof bandage. Use brightly colored bandages so they can be easily detected if they fall off.

Jewelry

- No jewelry is to be worn when working. Our primary concern is any stones or other pieces falling into the medication.

Perfume

- Please use no heavy aromatic perfumes or colognes.

Grow and Manufacturing Uniforms

- See "Uniforms" section

Office Staff

Casual business attire is required

DRUG AND ALCOHOL POLICY

PharmaFarm values the health and safety of all of its associates. Problems with drugs and alcohol use on and off the job can affect health, safety, and job performance. The purpose of our drug and alcohol policy is to further the company's commitment to safety and high standards of performance, productivity and reliability. Associates must report to work in condition to perform their duties safely and efficiently. PharmaFarm requires that all employees refrain from the use of alcohol and drugs at any time such use might impair their ability to perform their required functions or professionally represent the company. The company does not wish to unnecessarily intrude on the private lives of its associates, however our policy is to maintain a workplace free of the influence of drugs and alcohol. To that end, Pharmafarm may require that employees submit to drug testing under certain circumstances (*see* section on drug testing.) Employees who feel they have a problem with drugs or alcohol are encouraged to seek help before it affects their performance. Employees who self disclose an issue before an abuse problem is discovered through testing, will be given an opportunity to obtain an assessment, rehabilitation and/or treatment without jeopardizing their employment. PharmFard does offer substance abuse counseling services for its associates through an Employee Assistance Program. All counseling services are strictly confidential and are not disclosed to PharmaFarm management.

DRUG AND ALCOHOL TESTING

PharmaFarm administers drug and alcohol tests under the following circumstances:

***Pre-employment**:* Outside applicants who have been offered a position with PharmaFarm will be tested for drug use as part of their post-offer health review. All new hires are required to submit to a drug test within the first 60 days of employment. Applicants or new hires who refuse to consent to a drug test, fail to comply with all testing procedures, or who test positive for illegal drugs will be disqualified from employment.

***Post-Accident**:* All employees will be tested for drugs following a work-related accident resulting in injury to a person or damage to property. Employees will be tested for alcohol following a work-related accident resulting in injury to a person or damage to property when PharmaFarm management reasonably believes that the employee's use of alcohol may have caused or contributed to the accident. Post-accident drug testing will be conducted within twenty-four (24) hours of the accident. Post-accident alcohol testing will be conducted within two (2) hours of the accident. If testing cannot be conducted within the prescribed time limits, the reason such testing was not conducted shall be documented. Employees must immediately report any accident, which results in an injury, and may leave the scene of an accident for the period of time necessary to obtain assistance in responding to the accident or to obtain necessary medical care. Employees subject to post-accident testing must otherwise remain available for drug and/or alcohol testing

until they have been informed that no test will be required, or their alcohol test or urine specimen collection has been completed. The failure to remain available will be considered a refusal to take the test, unless the employee is seriously injured and cannot provide a specimen for testing. In that event, the employee may be requested to authorize the release of relevant hospital reports or other documentation that would indicate whether there were any drugs or alcohol in the employee's system at the time of the accident.

Reasonable Suspicion: Employees will be drug and/or alcohol tested if PharmaFarm reasonably believes that the employee is under the influence of drugs or alcohol while on company premises or engaged in company business. Factors supporting a reasonable belief must be observed by a supervisor trained in identifying drug and alcohol impairment, documented and placed in the employee's file. The following factors may be considered in assessing whether an employee is under the influence of drugs or alcohol:

- Drowsiness
- An odor or alcohol or burnt cannabis about the employee
- A change in speech pattern from the employee's normal speech (such as slurred or incoherent speech)
- Possession of drugs or drug paraphernalia
- Reported use of drugs or alcohol at work, in company vehicles or while engaged in company business
- Recurring late arrivals or absences
- Frequent unexplained errors, mistakes, accidents or injuries
- Careless operation of equipment
- Frequent damage of inventory or materials during handling
- Mistakes or accidents resulting in damage to persons or property
- Unusual behavior, including moodiness or inappropriate responses.

Suspension Following Post-Accident Testing: Employees tested post-accident or for reasonable suspicion will be immediately removed from the workplace and considered suspended without pay. Employees may not return to work while test results are pending or if they have refused to submit to a drug or alcohol test required under this policy. Employees will be reinstated and paid for lost work time resulting from participation in the drug-testing program when the results of non-injury post-accident or reasonable suspicion tests are negative. If the accident resulted in injury to the employee, and the post-accident drug and alcohol tests are negative, the employee's wages will be paid consistent with workers compensation laws and the company's paid leave policies.

Random Testing*:* PharmaFarm reserves the right to conduct random drug testing of all employees in safety sensitive positions.

Follow-up Testing*:* An employee who voluntarily discloses a drug or alcohol

problem before it is revealed through testing will be subject to random, follow-up testing for twenty-four months after returning to work, or successfully completing any recommended rehabilitation, treatment or counseling program, whichever is longer. Drug and alcohol test results are kept confidential, except as necessary to deal with the affected individuals.

EATING AND DRINKING

- Lunch break is scheduled for 45 minutes.
- Food and beverage can only be consumed in the Employee Break Area. You may leave for lunch but will be required to exit and re-enter with all security requirements maintained.
- No meal deliveries are permitted to PharmFarm.
- Always be sure to clean up after you are finished using the breakroom and recycle any materials possible.
- The kitchenette has been provided for your convenience and we would very much appreciate the equipment be handled with consideration and care, like all the equipment at PharmaFarm..

EMAIL AND INTERNET USE

a) For unsolicited virus warnings please contact management immediately. Do NOT forward to anyone else.
b) Email and Internet access are intended to be a business tool and should be treated as such. Personal use should be non-existent. Instances of abuse will be subject to disciplinary action.
d) External emails containing commercially confidential or sensitive information or content must be encrypted.
e) Users should regularly housekeep email and save or delete emails and attachments appropriately.
f) Information of a commercially confidential or sensitive nature must not be disclosed to non-company organizations without obtaining appropriate PharmaFarm management authorization.
g) Storing of personal or non-business information on Company computers is not allowed, as it may inadvertently compromise the individual and the Company cannot be held responsible for its protection.

EMPLOYEE ENERGY SYNCHRONIZATION (Tai-Chi)

Each day at 8:45 AM and 1:00PM, the entire staff will spend 10 minutes practicing Tai-chi. This is an employment requirement and attendance is mandatory and must be taken both seriously and with positive intent. We want positive energy around the plants.

EMPLOYEE REGISTRATION AND IDENTIFICATION CARDS

The state requires that all employees of PharmaFarm be registered. Information submitted will include but may not be limited to name, address, social security number, name and address of PharmaFarm, past employment history, criminal record and other pertinent information. Until you are registered with the state and receive an identification card, you can not work at PharmaFarm. The state will be conducting a background check on all registrants.

A non-refundable fee of $100.00 will be charged by the state for each employee. If the registration application is filled out honestly and with complete truth, you should be approved. If you do not tell the truth, you will be rejected. (You could also be rejected for pervious criminal drug record or other.) You will be required to put up the $100 and when the permit is approved, PharmaFarm will reimburse the $100.

These identification cards must be worn at work at all times. At the end of your shift, these cards will be left with security and picked-up on your next shift. If you lose the card, the state cost to replace the card is $100 and it will be your responsibility to cover that expense.

EMPLOYMENT OF RELATIVES

PharmaFarm does not discriminate against applicants for employment based solely on the existence of a familial or similar relationship with a current or former employee. Relatives of employees will be considered on the same basis other applicants for employment, unless hiring the applicant would result in an employee being directly or indirectly supervised by a relative. For the purpose of this policy, a "relative" is defined as any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

PharmaFarm recognizes that the employment of relatives, particularly in the same work area, can result in real or perceived favoritism or conflicts of interest that may negatively impact employee performance and morale. In the event these or other problems develop between or as the result of the employment of relatives, the problems will be addressed in the same manner as any other performance or conduct related issue. (See PharmaFarm Code of Ethics for more information.)

EVALUATIONS

All employees receive written and verbal performance reviews twice a year (every six months.) The evaluation process is intended to let you know how well you're performing and to help you be more effective and productive. The evaluation also gives you the opportunity to share your thoughts about your performance and future goals with us. This process is also an opportunity to identify accomplishments and strengths, as well openly discuss areas and goals for improvement. Depending on your position and performance, you may be eligible

for a salary increase. Pay increases are not guaranteed. The company operates on the credo that you get what you give and salary increases are based solely on an individual's job performance.

FAMILY AND MEDICAL LEAVE

An employee, who has been employed for at least 12 months and for at least 1,250 hours of service during those 12 months, may be granted paid or unpaid leave for one or more of the following reasons:

- Birth of son/daughter and in order to care for such son/daughter.
- Placement of son/daughter with the employee for adoption or foster care.
- To care for a spouse, son, daughter or parent who has a serious health issue.
- A serious health condition that renders the associate incapable of performing the functions of his/her position.

Up to a total of 12 work weeks of leave during any 12-month period may be granted under this policy. Such leave must be taken on a sustained or uninterrupted basis, except that intermittent leave may be taken for serious health care of the associate, child, spouse or parent. You must provide as much prior notice as reasonably possible for these conditions. All such requests will be dealt with on an individual basis.

FIRE PROTECTION

All associates must understand the potential for fire at PharmaFarm. You will be fully trained in this regard. Exits, procedures and drills will be reviewed with all associates as part of our ongoing training programs.

FIRST AID

First-aid supplies will be available in the event of a minor injury. These will be found at the first aid station. A difibrillator will also be found here. Senior management and security will be trained in its operation. Any injury that rises above the indication of a minor injury will be referred to the hospital emergency room or local health care facility.

HARASSMENT

It is this company's policy to treat all our team associates with dignity and respect and make business decisions without regard to race, sexual orientation, age, color, national origin, religion or disability. We strive to provide anyone a workplace that is free of harassment of any kind. Associates are encouraged to promptly report incidences of harassment. Any report will be treated with careful regard for all parties concerned and will be dealt with professionally and with serious intent.

HEALTH INSURANCE

PharmFarm does offer a healthcare program for its associates. After three months of continued fulltime employment, an associate who wants to take advantage of the company's healthcare program will be invited to meet with our Office Manager to discuss the details and shared cost of the policy.

HIRING

PharmaFarm's policy is to hire only United States citizens and aliens who are authorized to work in this country. As by law, potential team associates will be required to provide original documents that establish this authorization as well as other information required by the Department of Consumer protection prior to hire. Employees and employers are both required to complete a form furnished by the Department of Labor, form I-9. In Section 1 of form I-9, the information provided by the employee must be valid and authentic. If at any time during an employee's employment, it is discovered that any document used was invalid or not authentic, the employee must by law, be immediately terminated.

HOLIDAY CLOSINGS

New Year's Day
Fourth of July
Thanksgiving Day
Christmas Day
Other closings due to holidays are subject to notice.
Associates will be paid for these holidays.

KEY CONTROL

Specific associates will have key access to certain secured spaces of the facility. An electronic key tracing system is uses for all keys that give access to secured areas. This key system will only release keys to authorized associates while producing a record of every transaction and producing an accurate usage log. The system will also include a tracking program for all secured keys. Any associate using this system will be trained in its proper operation and security procedures.

LOST PAYCHECKS

Report lost paychecks immediately to the bookkeeper. We will stop payment on the lost check and reissue you another check as soon as possible. First offense the reissued check will not incur a deduction equal to the bank stop payment charge. Any offense thereafter will require this deduction to be made from your paycheck. (Don't lose your paycheck.)

MANAGEMENT AND EMPLOYEE RELATIONS

We are committed to provide you with the tools and positive working environment for you to do your job to the best of your ability with minimal distractions. You will be treated with respect and dignity and we will try our best to recognize and reward your hard work and accomplishments. We recognize there may be occasions for misunderstandings and problems that come up. We want to clear up these types of situations in a fair and timely manner. In order to accomplish this we need your help in bringing them to our attention. We want you to know that management is never too busy to be informed of work- related problems, complaints or disputes. If you have such a problem, you should promptly speak to your manager. They will listen in an open, objective and courteous manner as we want to understand and solve all problems to the best of our ability. If the problem is not resolved to your satisfaction, you should request that your immediate manager ask for a meeting with the General Manager. Every necessary action will be taken to resolve a problem or settle a dispute in a fair and equitable manner. **As we said in the Welcome Letter, we recognize our employees as one of our most valuable resources and we take all problems and complaints very seriously.**

MATERIAL SAFETY DATA SHEETS

Copies of all the Material Safety Data Sheets (MSDS) for all hazardous materials to which you may be exposed will be kept in the first aid area and in the immediate area where these materials are stored. MSDS sheets will be available to all employees in their work area for review during work hours.

MEDICAL CANNABIS

For our business, medical cannabis is considered the equivalent of a prescription drug. We will accommodate the use of medical cannabis under the following circumstances:

1. Employee's use is authorized under state law. The employee is eligible to use medical cannabis under state law. This means that the employee possesses a valid registration card.
2. The employee does not use medical marijuana on company premises, in company vehicles, or when engaged in company business and not on the company premises.
4. If the employee notifies his/her supervisor and if the employee's use of medical cannabis will not pose a threat to the health or safety of others, so that management can consider other accommodation, such as reassignment, leave or other.
5. The employee is not employed in a position subject to U.S. Department of Transportation (DOT) regulations or driving a motor vehicle for business purposes.

NON-DISCRIMINATION

Pharmafarm is an equal opportunity employer. We will not tolerate discrimination based on race, sex, age, national origin, religion, sexual orientation, or disability. Employment decisions, such as hiring, promotion, compensation, training and discipline will be made only for legitimate business reasons based upon qualifications, productivity, work ethic, integrity and other nondiscriminatory factors.

ORIENTATION PERIOD

You have been through our employee selection process, have been selected for employment and appear to have the potential to develop into a successful team associate. However, we want the opportunity to begin the training period, get to know you, see how you fit-in with your co-workers and determine if you are willing and able to carry out the responsibilities for the position in which you were hired. It's also important for you to get to know us and become familiar with how we operate to find out if this job is a good fit.

We have a one-month orientation period for that purpose referred to above. This one-month period allows both you and the company to see whether or not we're a good fit and if not, we part as friends. During the Orientation Period you will begin your training and be observed by management. Also, during this time if you feel you do not understand what's expected of you or that you need additional training, we encourage you to ask questions and seek additional help from our team. We want you to succeed with us. After your first month, you will be asked to meet with management, review your performance and proceed accordingly.

OVERTIME

In accordance with Federal Minimum Wage Law, hourly employees are paid overtime when they work more than 40 hours in one week. Hourly employees are paid at one and one-half times their basic straight time rate for all overtime hours worked.

PACKAGES AND PURSES

Packages, bags or purses are allowed in any building or interior space otherwise they are subject to inspection upon departure. Please leave valuables at home. Our security staff will be as accommodating as possible however the respect of this rule is very important and if not followed, will result in termination. In other words security has to inspect your stuff on the way out.

A private locker will be supplied in the employee area for your personal belongings. A combination lock will be supplied by management for your personal use.

PAYROLL

Paychecks will be distributed twice monthly and can be picked-up at the office manager's office at the end of the work shift. Any problems with your check, please see the bookkeeper first before you either get upset or speak to management. The bookkeeper is there to help on these problems, which usually are simply mistakes.

PAYROLL DEDUCTIONS

Your paycheck will indicate your gross earnings as well as deductions for federal and state withholding taxes and social security and Medicare taxes. Federal and state withholding taxes are authorized by you based on the information you furnished to us on form W-4. If you want an explanation of your deductions or if you wish to change them in any way please the bookkeeper. As per state law, our business complies with court orders in connection to garnishments from employee paychecks as directed by the proper authorities. You will be notified of any court-ordered payroll deductions

PRESCRIPTION AND OVER-THE-COUNTER MEDICATIONS

An employee may maintain on the company premises prescription drugs and over-the-counter medication, provided:

1. The drugs have been legally prescribed for the employee's use.
2. The employee is taking the prescription drugs as prescribed.
3. The prescription drugs are kept in their original container.

The use of prescription drugs that by manufacturer warning, state they can impair your ability to work or operate a vehicle, must be first addressed to management prior to any associate using them while at work. They may also require a written statement from their prescribing physician regarding any impact the use of these prescription drugs may have the user/patient in a workplace environment.

PROPRIETARY AND CONFIDENTIAL INFORMATION

It is illegal to steal copy or communicate or transmit a former or current employer's confidential or proprietary information. Proprietary information is defined as "the whole or any part of any scientific or technical information, design, process, procedure, formula, or improvement that has value and that the owner has taken measures to prevent from becoming available to persons other than those selected by the owner to have access for limited purposes." Our internal business practices, procedures and techniques are of great value to the company. Associates are not to disclose any proprietary techniques, processes or other to any person unless directed to by PharmaFarm owners. PharmaFarm may request that an associate sign a Non-Disclosure/Non-Compete agreement for this reason. PharmaFarm will

institute civil and legal action against anyone who violates this policy and to the fullest extent of the law. See the PharmaFarm Code of Ethics for more information.

RESIGNATIONS

You are requested to give two-week notice of your plans to leave the PharmaFarm. Notice is important so that we have time to hire and begin to train someone to take your place. We understand that sometimes it is just time to move on and we would like to do that as friends. Notice of resignation should be put into a letter including last day of work and reason for the resignation. Please don't leave us but if you do, deliver your resignation to your immediate supervisor.

SAFETY

PharmaFarm is committed to maintaining a safe workplace for all of our associates. The time to be conscious about safety is before an accident happens. Safety is everyone's responsibility and is a regular, ongoing part of everyone's job. You will receive more specific, detailed information and training on safety issues as an ongoing part of your employment at PharmFarm. However, here are some basic guidelines and safety rules to always keep in mind:

1). Wipe-up spills immediately. Move a wet floor marker to the spot.
2). Never run in hallways or production areas, always walk carefully. Even when it's busy, take small steps and pay attention.
3). Wear shoes with non-slip soles. They cost no more that standard shoes.
4). Report defective equipment or tools to a manager immediately.
5). Never operate equipment unless you have been properly trained on how to use it and are authorized to do so.
6). Pay special attention when using a knife or other tools like trimmers. They are sharp and can cause injury if not handled with respect.
7). Wear latex gloves whenever handling any medication.
8). Use proper lifting techniques. Never lift too much. If it's uncomfortable, make two trips or get some help. Remember to always bend at the knees, lift with your legs, not your back.

Report all accidents, no matter how minor they seem, to the manager on duty. In the event of an emergency, like an apparent injury or choking situation, notify a manager immediately, in a scenario such as this, running would be permissible in order to locate management immediately. Managers are trained and responsible for administering CPR, choking procedures, defibrillation or appropriate first aid.

SANITATION

Due to the nature of our business, it is ABSOLUTELY ESSENTIAL that EVERYONE follows safe our handling procedures and there is absolutely no compromise. NEVER take shortcuts on sanitation. **Each day we are entrusted with the health**

and of our patients. When they use our products, the patient needs to always know that the medication is safe, reliable and can be trusted. This is a responsibility we take very seriously, one that and that we want you to also do the same. While you will receive additional and ongoing training on medicine handling and safety issues, the following are some of the basic rules we ALWAYS follow:

1). Always wash your hands thoroughly after eating, using the restrooms, smoking, coughing, sneezing or touching your hair, face or mouth. Always be sure you dry your hands well after washing.
2). When you cough or sneeze, do so into your sleeve to minimize the spread of bacteria, if you are wearing gloves, change them, if you are not wearing gloves, wash your hands.

3). Company supplied latex gloves must always be used when handling any medication. If you are allergic to latex, please let us know immediately.
4). Sanitize everything. Use sanitizing solution to constantly keep counters, surfaces, and utensils spotless. This helps to keep medicine areas, food areas and tools free of bacteria.
5). Always keep food ingredients at their proper storage temperatures. Potentially hazardous foods like dairy and other highly perishable foods should always be stored below 45ºF. Bacteria count on food grows rapidly between 45ºF and 140ºF so it's imperative that our food products spend a minimum amount of time in this "temperature danger zone."
6). Store all ingredients or other consumable materials away from all chemicals, cleaning products and any other products that could pose a health concern.
7). All floors must be well maintained and keep clean at all times.
8). Garbage cans must be emptied at least at the end of the day and more frequently if needed.
9). The bathrooms must be left immaculate after each use. Please be sure to wipe down the counters after washing your hands.
10). Always clean-up after yourself; in the employee break area, bathrooms, grow rooms and offices. We ask that you clean as you go, that means in whatever you are doing stay organized, work clean and efficiently.
11). At the end of each work day, the entire facility must be left spotless for the start of the next day's work. Your manager will train and direct you on all sanitation-based closing procedures.
12). No gum chewing

SCHEDULING

Schedules are prepared to meet the work demands of the farm. As the work demands change, management reserves the right to adjust working hours and shifts. Schedules are posted weekly on Thursday for the following week on the associate's

news board. Each associate is responsible for working his or her assigned shifts. If you need someone to cover your shift, you must find an associate willing to do so and then, it must be approved by management. To be approved, the manager must initial the change on the posted schedule. We understand that you have a life outside of PharmaFarm and we will always try to find a way to work with you on your schedule requests. Please give us as much notice as possible when requesting a coverage change in the schedule.

Keep in mind that some days including Saturday's or Sundays could be our most crucial shifts based on our crop requirements and you may be required to work.

You should arrive for your shift with enough time to make sure you're ready to work when your shift actually begins by schedule. We suggest that you arrive 15 minutes before your shift begins so that you have time to get settled including uniform change, jewelry off, personal belongings in your locker and ready to begin your shift.

You should clock-in on our time clock when your shift begins and be ready to start work immediately.

SECURITY

Security at PharmaFarm is an absolute TOP priority. You will be trained in a number of security procedures of which you will be required to follow them completely and with no deviation. Disregard for these requirements could result in termination.

As an overview, the PharmaFarm facility is equipped with a sophisticated security system using a combination of equipment, technology and procedure to keep the facility safe and secure.

As an associate you will be required to check in at the beginning of the day and will not be able to leave or return to the building without authorization and clearance by security.

As mentioned under "Employee Registration and Identification Cards" you will be issued a state-issued identification card. No person shall begin work at PharmaFarm without a identification card. These cards must be worn on the outside of your uniform. The cards will be left at the facility at the end of each day and picked-up the following morning upon arrival for work.

SEXUAL HARASSMENT

All of our associates have the right to be free from sexual harassment. PharmaFarm does not condone actions, words, jokes or comments that a reasonable person would regard as sexually harassing or coercive.

Definition of Sexual Harassment

Sexual harassment encompasses any sexual attention, from either gender, that is unwanted and is defined as unwelcome advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when:

Submission is made as an expressed or implied term or condition of employment or Status in a class, program or activity.

Submission to or rejection of the behavior is used to make an employment decision (such as hiring or promotion).

The conduct has the purpose or effect of unreasonably interfering with a person's work performance or creates an intimidating, hostile or offensive environment for work or learning, including harassment in the workplace from an outside party, such as a vendor.

Sexual harassment may take many forms, for example:

- Physical assault.
- Direct or implied threats that submission to sexual advances will be a condition of employment, work schedule, promotion, job assignments, evaluation, wages or any other condition of employment.
- Direct propositions of a sexual nature.
- Comments of a sexual nature.
- Unnecessary touching, patting, hugging or brushing against a person's body.
- Remarks of a sexual nature about a person's clothing, body, sexual activity or previous sexual experience.
- Employees need to be concerned not only with the intent of their actions of this kind but also the effects; while sexual harassment involves repeated, unwanted sexual attention, persons involved in isolated or inadvertent incidents demonstrate insensitivity toward others.
- Repeated occurrences will be considered intentional violations of the policy.

Report sexual harassment promptly to at least two people who are in a supervisory or management capacity. Your complaint will be kept confidential. A prompt and thorough investigation will be made. If a claim is substantiated, the Company will take immediate and appropriate action, which could include disciplinary action, termination or prosecution.

SICK AND PERSONAL DAYS

Each employee after working:	6 Months	1 Year
	1 Personal Day	3 Personal Days
	1 Sick Days	2 Sick Days

Sick and personal days are paid days. For personal days, at least two weeks notice and approval from management is required, unless it is an emergency.

SMOKING

The entire PharmaFarm facility is designated as non-smoking. Employees must refrain from smoking except in the designated smoking area. Smoking is limited to an employee's break or lunchtime, once an employee begins their regular schedule workday. Hands must always be washed after smoking and cigarettes must be carefully extinguished and deposited in the proper container.

SOLICITATION

Employees

There should be no solicitation or distribution of literature of any kind by any associate during actual working time of the associate soliciting or the associate being solicited. Working time does not include lunch and rest breaks. Any associate who violates any part of this policy could be subject to disciplinary action up to and including dismissal.

Non-Employees

Non-employees are prohibited from soliciting and distributing literature at all times anywhere on Company property. Non-employees have no right of access to any area of the premises without prior permission from the state and PharmaFarm.

STAFF MEETINGS

Staff meetings will be held on a weekly basis. These meetings are important and attendance is mandatory. Only management-approved absences will be accepted. Most meetings offer employees the opportunity to provide valuable input and provide suggestions to improve our work environment and the operation of our facility. Compensation will be paid to all employees for meeting time commensurate with the length of the meeting.

STANDARDS AND CODE OF CONDUCT

Consistent with our mission and values, it is important for all associates to be fully aware of the rules which govern our professional conduct and behavior

AN ASSOCIATE INVOLVED IN ANY OF THE FOLLOWING CONDUCT MAY RESULT IN DISCIPLINARY ACTION UP TO AND INCLUDING IMMEDIATE TERMINATION WITHOUT A WRITTEN WARNING.

1). Invalid Work Authorization (I-9 form)
2). Supplying false or misleading information to PharmaFarm including information at the time of application for employment, leave of absence or other false information.
3). Not showing up for a shift without notifying the manager on duty. (No call, no show, no job)
4). Clocking another associate "in" or "out" on the PharmaFarm timekeeping system or having another associate clock you either "in" or "out."
5). Leaving your job before the scheduled time without the permission of your manager.
6). Disorderly, inappropriate or indecent conduct.
7). Gambling on the property.
8). Theft of another associate's property
9). Theft of a PharmaFarm property.
10). Refusal to follow instructions.
11). Engaging in harassment of any kind toward another associate.
12). Failure to consistently perform job responsibilities in a satisfactory manner within the one month orientation period.
13). Distribution or possession of illegal drugs or alcoholic beverages on PharmaFarm property.
14). Being under the influence of these substances when reporting to work or during work hours.
15). Waste or destruction of PharmaFarm property.
16. Actions or threats of violence or abusive language directed toward another associate team member.
17). Excessive tardiness.
18). Habitual failure to punch in or out on the time clock.
19). Disclosing confidential information including policies, procedures, recipes, formulations, manuals or any propriety information to anyone not employed by PharmaFarm.
20). Smoking or eating in unapproved areas or during unauthorized breaks.
21). Not parking in associate designated parking areas.
22). Failure to comply with PharmaFarm personal hygiene and grooming standards.
23). Failure to comply with PharmaFarm uniform requirements.
24). Unauthorized operation, repair or attempt to repair machines, tools or equipment.
25). Failure to report safety hazards, equipment defects, accidents or injuries immediately to management.

TARDINESS

Employees must be prepared to start work promptly at the beginning of the shift. We suggest you arrive 15 minutes before your shift begins. Your scheduled time is the time you are expected to be on your job, not arrive at the job. Repeated tardiness is grounds for termination. If it is not possible for you to begin work at your scheduled time, always call the Manager..

TEAMWORK

We cannot achieve our goals and provide the highest levels of service to our patients without working together as a team. Teamwork basically boils down to common courtesy and common sense. If a co-worker is overloaded and you're not, help them in any way you can. It's only a matter of time before they will return the help. It is said one hand wash's the other. Think about it, if you have a bar and soap in one hand and try to wash that same hand, it really doesn't get clean. But if you use both hands work together…….well you get the picture.

TIME CLOCK

You given an associate ID number to clock in and out on the company's timekeeping system. Tampering, altering, or falsifying time records or recording time on another employee's ID number is not allowed and may result in disciplinary action, up to and including termination.

TRASH REMOVAL

The removal of trash to our trash container can only be done with management being present. Any doors required for opening requires manager approval and presence.

UNEMPLOYMENT BENEFITS

For information on unemployment procedure and benefits please visit http://www.ctdol.state.ct.us/progsupt/unemplt/unemployment.htm

UNIFORMS

PharmaFarm will supply uniforms for all grow related associates, laboratory and research associates. These uniforms are not to be taken home. You will be assigned three (3) for every five (5) days. PharmaFarm will be responsible for cleaning them. Uniform sizes will be verified at time of hire and all uniforms, clean and dirty, will be stored in the uniform storeroom. This room must be kept immaculate at all times.

Uniform:

Lab Coat – ¾ length, no pockets
Hat

VACATIONS

All full-time associates who have been employed with PharmaFarm for a consecutive 12-month period are eligible for a one week, paid vacation. Associates are considered full-time if they averaged over 30 hours of work per week the previous year. To request time-off for vacation please see the bookkeeper for a Employee Leave Request. Associates are asked to submit requests for vacation at least two-months prior to the scheduled vacation date, unless the request is due to an unexpected situation. Efforts will be made to grant vacation time as requested, but business needs or previous vacation request may require an associate to adjust his or her vacation time. After two years of employment, the paid vacation period is two weeks.

VISITOR POLICY

Visitors are not allowed into PharmFarm at any time. Exceptions are made only by special request to management and management must then go to the state of permission. This is a process and it takes time with no assurances permission will be granted.

WORKER'S COMPENSATION

Worker's compensation provides benefits for associates who suffer personal injury from accidents or illnesses arising out of, and in the course of, their employment with the dispensary or grow facility. An associate who is injured on the job, regardless of the severity of the injury or illness, should:

1). Report the occurrence to the manager on duty.
2). The manager on duty will need to obtain information as to exactly what happened, how the injury or illness occurred, the exact time and location, as well as any witnesses to the occurrence.
3). If an associate experiences a disabling work injury, the nature of which necessitates an absence from work, a manager, will provide the associate with information concerning his or her lawful benefits.

All of the information in this handbook will be reviewed with you as part of your orientation and training. At that time you will have all the time necessary to answer all of your questions.

Thank you

HANDBOOK RECEIPT

This Employee Handbook does not constitute a contract of employment either in whole or in part. PharmaFarm, reserves the right to add, delete, or change any portion of the

Employee Handbook with or without notice.

FOR THE EMPLOYEE'S INFORMATION:

Your employment status: _____ Full Time _____ Part Time

Your position title: _____

General Manager's Name: _____

Your starting date: _____

I acknowledge receipt of, and have read, the Employee Handbook that outlines my benefits and obligations as an employee of PharmaFarm. I understand the standards of conduct and each of the rules and regulations which I am expected to follow, as well as the additional policies. I agree to abide by all of them.

POLICY STATEMENT

This handbook is a general guide and provisions of this handbook do not constitute an employment agreement (contract) or a guarantee of continued employment. It is simply intended to outline the benefits and work requirements for all employees. It is further understood that the Company reserves the right to change the provisions in this handbook at any time. It is policy of the Company that employment and compensation of any employee is at will and can be terminated with or without cause, at any time, at the option of the employee or at the option of the Company.

_____ _____

Manager's Signature Date Employee's Signature Date

SECTION I BONUS POINTS
Sub-Section I.1 Employee Working Environment Plan
Environmental Health & Safety Ergonomic Program

Overview
Ergonomics is the study of people and their interaction with the elements of their job or task including equipment, tools, facilities, processes, and environment. When aspects of work or workplace exceed the body's capabilities, the result is often a musculoskeletal disorder (MSD), also known as repetitive motion injuries (RMI). To help avoid MSDs work demands should not exceed the physical capabilities of the worker. MSD do not include slips, trips and falls, cuts, motor vehicle accidents or other similar accidents.

This program enables PharmaFarm to meet the requirements of its policy which targets repetitive motion injuries. This program is integrated into the written Injury and Illness Prevention Program (IIPP), referring to hazard assessment and hazard correction as they relate to ergonomic exposures.

It is the policy of PharmaFarm to provide employees with a safe and healthy workplace. We are committed to reducing and/or eliminating the risk factors associated with MSDs.

The purpose of the ergonomics program is to apply ergonomic principles to the workplace in and effort to reduce or eliminate the number and/or severity of MSDs, thus decreasing workers' compensation clams, and where possible increase productivity, quality, and efficiency. A proactive approach seeks to anticipate and prevent ergonomic issues. Identifying and prioritizing jobs with increased risk factors are important steps to this program. This program is a collaborative effort with managers and employees.

Responsibilities
The Safety Committee. The PharmaFarm Safety Committee (General Manager, Lead Grower, Security) is responsible for establishing and maintaining this policy and program. All evaluations, controls, and training are coordinated under the direction of the Safety Committee. The Committee's and their designees' responsibilities include;

- Emphasizing the importance of early reporting of employee symptoms, and the use of self-assessment tools to managers and/or supervisors.
- Facilitating the identification of employees' level of risk.
- Scheduling initial training and ongoing training of managers and employees and maintain records to include the date, name of instructor, topic and materials used.
- Ensuring measures and recommendations are implemented in a timely manner.
- Monitoring the program on an annual basis, and make recommendations to the PharmaFarm Safety Committee if updates or changes are needed.

Managers. Managers who supervise employees have the following responsibilities:

- Emphasize the importance of early reporting of employee symptoms,

and the use of self-assessment tools to managers and/or supervisors.
- Encourage active participation by employees in completing the initial self-assessment and follow-up assessment when required.
- Ensure attendance at required training and encourage participation in the development of controls.
- Ensure the implementation of recommended control measures and develop a system to monitor their effectiveness.

Employees. Employees are the essential element to the success of the Ergonomic Program and are responsible for the safety of their own actions. The following are specific responsibilities of each employee with respect to ergonomics:

- Make request to his/her supervisor for ergonomics evaluation, if needed.
- Use the appropriate tools, equipment, materials, and procedures in the manner recommend and to report when they are not in good condition.
- Attend ergonomic training as required and apply the knowledge and skills acquired to actual work activities.
- Report MSD signs or symptoms and work related MSD hazards as soon as possible your supervisor to facilitate proactive interventions, and/or to receive prompt medical treatment.
- Provide input and assist in identifying ergonomic risk factors, worksite evaluations, and development and implementation of controls.
- Take responsibility for his/her personal health and safety.

Procedures

WORKSITE EVALUATIONS

Triggers for worksite evaluations:

- When an employee reports an MSD sign or symptom.
- Significant changes in an employee's job tasks and the way his/her work is expected to be completed.
- When a safety walk-through or scheduled inspection has uncovered potential MSD hazards.
- When a request by an employee or their supervisor for an ergonomic assessment of a work area(s), or work process(s) has been made

Work-related risk factors to be considered in the evaluation process include, but are not limited to:

- Physical risk factors including force, postures (awkward or static), static loading and sustained exertion, fatigue, repetition and contact stress.

- Administrative issues including job rotation/enlargement, inadequate staffing, excessive overtime, inadequate or lack of rest breaks, stress from deadlines, lack of training, work pace, and work methods.
- Environmental factors including noise, lighting, glare, air quality, temperature, humidity, and personal protective equipment and clothing.

Control of Ergonomic Risk Factors
PharmaFarm takes steps to identify ergonomic risks and reduce hazards using a three-tier hierarchy of control. These could include:

- Engineering controls, such as physical modifications of jobs, workstations, tools, equipment, or processes.
- Administrative controls, such as job rotation, rest/recovery breaks, work pace adjustments, and worker education.
- Personal protective equipment (PPE). Acceptable forms of PPE will be identified during ergonomic evaluations.

Training
Training is intended to enhance the ability of managers, supervisors and employees to recognize work-related ergonomic risk factors and to understand and apply appropriate control strategies. This training is provided as follows:

- To new employees during orientation.
- To employees assuming a new job assignment that uses different equipment, tools, or processes.
- When new job tasks, tools, equipment, workstations or processes are introduced.

The minimum training for managers, supervisors and employees includes the following elements:

- An explanation of the Ergonomic Program and employee's role in the program.
- A description of MSD signs and symptoms and consequences of injuries caused by work related factors.
- An emphasis on the importance of early reporting of MSD signs and symptoms and injuries to management.

Training is provided in one, or a combination of the following formats:

- Online training presentations.
- Oral presentations.
- Distribution of educational literature.
- Hands-on equipment and work practice demonstrations.

Training is documented. Employees are required to sign a training sign-in roster and or completion document.

Reporting
The following should be reported:

- Employees who experience discomfort or symptoms associated with MSDs should immediately report verbally and/or in writing to their direct supervisor.
- Any injury identified and diagnosed by a licensed healthcare provider as a work-related MSD must be reported to the supervisor or general manager immediately.
- Any supervisor or member of management who learns that an employee is experiencing MSD symptoms must notify the general manager immediately.

- Supervisors must notify the general manager upon the receipt of a request for an evaluation, modification or accommodation.
- The Safety Committee or their designees ensures appropriate action is taken and schedules an ergonomic evaluation if needed.

SECTION I BONUS POINTS
Sub-Section I.1 Employee Working Environment Plan

Illness & Injury Prevention Program

Overview

This Injury and Illness Prevention Program (IIPP) is developed in compliance with the United Starts Department of Labor OSHA regulations. This plan applies to all employees, part-time and full-time, working PharmaFarm.

This plan contains information regarding general safety concerns at PharmaFarm. Company policy requires that new employees be trained on this plan as soon as possible after their hire date and prior to any unsupervised work. This plan includes information about the following topics:

- Responsibilities
- Hazard Evaluations and Periodic Inspections
- Communication Methods
- Compliance Methods
- Accident and Injury Reporting and Investigation
- Corrective Actions
- Training
- Documentation

Responsibilities

Senior Management has ultimate responsibility for providing a safe, healthful, and an environmentally responsible workplace. PharmaFarm senior management recognizes this responsibility and is committed to providing a safe, healthful, and environmentally responsible workplace for our employees. Senior management has assigned responsibilities for managing and implementing the IIPP to the security staff.

The **Security Staff** program administrators' IIPP responsibilities include:

- Maintaining and implementing the written IIPP for PharmaFarm. This includes updating the written plan as needed and providing the appropriate information to managers with regard to the implementation of this plan.
- Providing training on this IIPP for all new employees.
- Overseeing the maintenance of records required by this IIPP, including training records, inspection records, hazard evaluation records, and injury and accident investigation records.

Managers who supervise employees have the following responsibilities:

- Ensuring that their employees are trained on the specific hazards associated with their work area
- Completing a New Hire Orientation checklist with all new employees prior to initiating activities in their work area
- Ensuring that their employees are familiar with emergency procedures

- Immediately notifying a security of all accidents within their department
- Conducting an investigation and submitting a Report of Injury, Illness, Incident or Near Misses (See Report of Injury Form) by the end of the business day following the incident to the general manager
- Informing security of new or transferred equipment, chemicals, or processes in their area and creating procedures for safe handling or uses of same.

Employees are responsible for the safety of their own actions and for monitoring the safety of operations around them. The following are specific responsibilities of each employee with respect to safety:

- Following documented SOPs and established procedures
- Promptly reporting any accidents, unsafe conditions, or unsafe acts to their manager, or in the absence of their manager security.
- Suggesting solutions to improve the safety of the process, equipment, training or the physical building.
- Being familiar with emergency procedures, and knowing safety and emergency equipment locations and operating procedures
- Notifying a security prior to the installation of new potentially hazardous equipment or the introduction of chemicals if the manager has not already done so.
- Maintaining personal work areas in accordance with general good housekeeping recommendations.
- Completing relevant safety training before beginning work.

The bookkeeper maintains employee file and has the following safety responsibilities:

- Managing the worker's compensation process.
- Actively participating in an accident investigation.
- Ensuring medical restrictions are accommodated wherever possible, provided such accommodation does not result in undue hardship for the company.

The Safety Committee's (general manager, lead grower and security) primary responsibilities are:

- Performing periodic safety inspections of all facilities to identify deficiencies and recommend corrective actions for managers to implement.
- Participating in accident investigations to identify causative factors and recommend corrective actions for managers to implement
- Reviewing the potential hazards of new equipment, processes, and/or materials (e.g. chemicals) and recommending control measures to be employed by the user(s).
- Ensuring the safe design, operation, and maintenance of facility equipment processes (e.g. HVAC, plumbing, and electrical)
- Serving as a conduit for communication of safety-related issues between employees and management.

Hazard Evaluation and Periodic Inspection

Hazard Evaluation

In order to have an effective safety program, the PharmaFarm must identify occupational hazards. These hazards can be identified through the use of hazard evaluations and periodic inspections. Hazard evaluations are conducted by the department managers. The hazard evaluations are conducted:

- Prior to establishing the IIPP
- When occupational injuries or illnesses occur.
- When new chemicals, procedures, or equipment that present potential new hazards are introduced into the workplace.
- When new or previously unidentified hazards are recognized.

Internal Safety Inspections

Safety inspections are conducted periodically (typically quarterly) and consist of at least the following:

- Observation of the work areas and operating conditions for general safety.
- Observation of the work areas and operating conditions for general ergonomic compliance.
- Observation of hazard communication relating to chemical labeling and storage, and other hazard posting requirements
- Assurance that equipment is operating properly prior to use and routinely during use.
- Inspections of safety equipment.

Records of initial evaluations and periodic formal inspections are kept on file in electronic format for a minimum of 3 years.

External Inspections

In addition to the safety inspections conducted internally, PharmaFarm is also subject to inspections from external agencies. These may include:

- Local fire department
- PharmaFarms' insurance carrier
- Health department
- Department of Consumer Protection

To further aid in the communication of safety concerns between management and employees, bulletin boards may be used to post information such as safety posters or OSHA guidelines. The bulletin boards at PharmaFarm can be found in the employee break area.

Compliance Methods

Violation of safety policies will not be tolerated. In order to ensure compliance with the policies established in this IIPP, PharmaFarm will take the following steps:

- Provide training to all employees regarding the IIPP.
- Encourage all employees to report unsafe conditions to

management, either verbally or in writing, including electronic communications.
- Provide required Personal Protective Equipment (PPE) and training on the use of PPE for employees.
- When necessary, provide appropriate disciplinary action for intentional unsafe acts or violations of company policies or procedures.

Accident and Injury Reporting and Investigation

Any accident, injury, musculoskeletal disorder (also known as repetitive motion injury), or illness related to job activity is to be reported immediately or as soon as possible to your immediate manager and a member of the Safety Committee.

The bookkeeper will contact the insurance company to submit a claim and provide the employee with a claim form. If the injury qualifies as an emergency, the employee or manager should call 911 from an office phone first. In other instances, if immediate medical or attention is needed, the employee should go to the nearest hospital emergency room if a designated medical facility is unavailable or not accessible. The designated medical facility is noted on the Workers Compensation posting in the employee break room. Employees may be treated by their personal physician if they have a Pre-designation of Personal Physician form signed by their physician and submitted to bookkeeper prior to an injury or illness.

The manager is responsible for providing a written report of the incident to the general manager by the end of the next business day. The incident report captures the following steps in an investigation:

- Interview the injured employee and any witnesses.
- Examine the work area to identify causes and contributing factors to the incident.
- Identify and implement corrective actions to prevent the incident from recurring.
- Incident reports and corrective/preventive actions are reviewed by the Safety Committee who may recommend additional follow-up investigations or other actions.

Corrective Actions

- When unsafe work conditions or practices are brought to the attention of PharmaFarm, these conditions will be corrected in a timely manner based on the severity of the hazard.
- In the event of an imminent hazard that cannot be immediately resolved without endangering employees or damaging property, all employees not necessary to correct the hazard are to be removed from the area until the hazard is resolved.

Training

- Employees of PharmaFarm receive training and instruction on general and job-specific safety and health practices.

- Managers receive training and instruction to familiarize them with the safety and health hazards present in their work areas.
- Training and instruction are provided at the following events:
  - When the IIPP is first established
  - When employees join the company
  - Whenever new hazardous processes, chemicals, or equipment are introduced to the workplace
  - Whenever the employer is made aware of a new or previously unrecognized hazard

General workplace safety and health practices

- Implementation of the policies in the IIPP
- Implementation of the policies in the Emergency Evacuation Plan in the handbook and Fire Prevention Plan
- Provisions for medical and first aid procedures
- Proper reporting of hazards and accidents to managers and the Safety Committee
- Proper storage and stacking of stock materials
- Proper housekeeping techniques to keep stairs, aisle ways, and exits clear, and to minimize spilling and tripping hazards
- Proper storage, labeling, and handling of hazardous materials and waste

Documentation

Required documentation is retained either in hard copy or electronic form deemed to be equivalent, true, and correct copies of the hard copy. The document retention requirements include the following:

- Training records are kept on file for a minimum of 3 years
- OSHA Logs are kept for 5 years
- Inspection and Investigation forms are kept for 3 years
- First aid records for job injuries causing loss of work time are kept for 5 years
- Chemical safety and toxic exposure records are kept for the duration of employment plus 30 years.

SECTION I BONUS POINTS
Sub-Section I.1 Employee Working Environment Plan

POLICY ON CORRECTIVE ACTION FOR COMPLIANCE VIOLATIONS
INTRODUCTION

PharmaFarm may periodically be required to consider corrective action with regard to employees who fail to comply with PharmaFarms' compliance policies and/or legal or regulatory requirements of the Connecticut Department of Consumer Protection governing the growing, branding, manufacturing, packaging, handling, promotion, sales and marketing of PharmaFarm products. In considering the appropriate steps to take in these situations, the company will evaluate a range of factors, as described below.

SCOPE

This policy applies only to corrective actions taken with respect to violations of PharmaFarms' compliance policies and/or legal or regulatory requirements of the Connecticut Department of Consumer Protection governing the growing, branding, manufacturing, packaging, handling, promotion, sales and marketing of PharmaFarm products.

ISSUES FOR CONSIDERATION

In situations where an employee is found to have violated PharmaFarm's compliance policies and/or legal or regulatory requirements of the Connecticut Department of Consumer Protection governing the growing, branding, manufacturing, packaging, handling, promotion, sales and marketing of PharmaFarm products, the General Manager in consultation with the employee's manager and if required PharmaFarms's legal counsel, will consider a range of factors in determining the appropriate level of discipline to impose.

These factors include;

- The seriousness of the violation
- the level of training received
- the employee's overall employment record and ,
- whether there appears to be a pattern of misconduct by the employee.

In addition, the company's legal counsel will consider the legal or policy issues at stake, the implications for the company, and the likely impact on the employee

involved.

CORRECTIVE ACTION
For Internal Use Only — Do Not Distribute

RANGE OF CORRECTIVE ACTION

In taking corrective action with respect to an employee's violation of PharmaFarms' compliance policies and/or legal or regulatory requirements of the Connecticut Department of Consumer Protection governing the growing, branding, manufacturing, packaging, handling, promotion, sales and marketing of PharmaFarm products, Senior Management will consider a range of options, including but not limited to the following:

- Oral notice from a supervisor;
- Written notice;
- Additional training or retraining;
- Denial of promotion;
- Reduction or elimination of bonuses or other compensation-related penalties;
- Transfer to a position subject to greater oversight;
- A performance improvement plan;
- Termination of employment; or
- Referral to government authorities.

When determining the form of corrective action, Senior Management will consult with the employee's manager and PharmaFarms' legal counsel. In general, the severity of the violation and the employee's past history of compliance violations will determine the form of corrective action taken.

SECTION 1. BONUS POINTS
Sub-Section 1.1 Employee Working Environment Plan

PHARMAFARM

CODE OF ETHICS

January 2014

PharmaFarm is committed to developing and commercializing high quality medicinal cannabis pharmaceutical products that meet the needs of patients and future health care providers, as well as providing value to our stockholders and employees. We are also committed to integrity and the pursuit of excellence in all that we do. We will fulfill these commitments while upholding a high level of ethical conduct and consistently meeting our responsibilities as good corporate citizens.

The Code of Conduct applies to all employees, officers and directors of PharmaFarm and Vintage Foods Ltd. and references herein to "employees" are intended to cover all employees and officers of the company. Under the Code, each employee and director individually must:

- Act with honesty and integrity at all times as a representative of the company;
- Become familiar with, and conduct company business in compliance with, Department of Consumer Protection, State of Connecticut and U.S. Federal laws, rules and regulations regarding the growing, handling and sale of medicinal cannabis;
- Understand and fully comply with the company's standards of business conduct and underlying policies and procedures;
- Adhere to company standards for protecting the safety and health of our employees, patients, physicians recommending our medicinal cannabis products and our Connecticut communities;
- Treat dispensaries, vendors, suppliers, partners and other employees in an honest and fair manner, with integrity;
- Be able to identify and appropriately handle actual or apparent conflicts of interest and avoid situations where personal interests are, or appear to be, in conflict with PharmaFarm's interests;
- Safeguard and properly use PharmaFarm proprietary information, assets and resources, as well as those of our dispensary customers, vendors and collaboration partners, which are entrusted to us;
- Maintain confidentiality of the company's non-public information;
- Protect the company's assets and ensure their efficient use; and
- Take the initiative to promptly report any violation or possible violation of this Code in accordance with the reporting procedures set forth in this Code.

Our greatest commitment is to the growing, manufacturing and distribution of pharmaceutical grade medicinal cannabis for patient use. It is paramount that this be accomplished in a safe and secure environment. An environment that ensures there is absolutely no question as to the integrity or patient-driven mission of the company. This is the responsibility of every employee.

1. Honest and Ethical Conduct
Employees and directors should endeavor to deal honestly, ethically and fairly with all PharmFarms' employees, partners, dispensaries, suppliers, vendors and competitors in compliance with all applicable laws, rules and regulations. PharmaFarm employees and directors must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

2. Compliance with the Law
Compliance with Connecticut Department of Consumer Protection, Connecticut State and U.S. Federal laws, rules and regulations is an overriding principle of PharmaFarms' standards of conduct. It is the company's policy that the company and each employee and director strictly conduct business in accordance with these rules and regulations. Employees and directors should understand the laws that apply to the performance of their jobs, and ensure that company operations with which they are involved are conducted in complete conformity with those laws. Violations of the law can seriously damage the company's reputation, subject the company to liability and/or adverse governmental proceedings, and in some cases, subject individual employees and directors to personal liability. Employees and directors may not instruct or request, either directly or indirectly, other employees or directors to violate the law. Each employee and director must be alert and sensitive to situations that could result in illegal, unethical or improper action. Questions concerning any legal responsibility or interpretation of legal requirements should be referred to the General Manager.

3. Conflicts of Interest
Each employee's primary employment obligation is to PharmaFarm. Any outside activity, such as a second job or self-employment, must be kept totally separate from activities with PharmaFarm and may not be in the medicinal cannabis industry. An employee may not use PharmaFarm time, name, influence, assets, facilities, materials or services of other employees for outside activities, unless specifically authorized by the company.
Each employee and director must put the best interests of the company at the forefront of any work-related activity or decision, and must be able to identify and appropriately handle conflicts of interest. A conflict of interest occurs when an employee's or director's personal interest interferes, or appears to interfere, with the best interests of PharmaFarm. A conflict of interest can arise whenever a person who is an employee or director takes action or has an interest that influences his or her judgment, loyalty, honesty, effectiveness or objectivity in a manner that is contrary to the best interests of PharmaFarm.

While it is not possible to identify every particular activity that might give rise to a conflict of interest, a conflict of interest may exist because of a relationship of an employee or director, or an employee's or director's family member (in this context, a family member can be defined as the employee's or director's spouse, domestic partner, parent, child, stepchild, or sibling; the employee's or director's spouse's or

domestic partner's parent, child, stepchild or sibling or the spouse or domestic partner of the employee's or director's child) that could cause a conflict with the employee's or director's ability to perform his/her job responsibilities. Potential conflict of interest situations include:

- A significant ownership or financial interest in a company supplier, dispensary or competitor (other than ownership of nominal amounts of stock in publicly traded companies);
- A consulting or employment relationship with a company customer, (dispensary), vendor or supplier or competitor;
- Activity that harms a relationship between the company and any of its customers or potential customers, or that interferes with a current or potential contract relationship;
- Business activity that is competitive with any of the company's businesses;
- Service on the board of directors or advisory board of a company dispensary, vendor, supplier or competitor;
- A direct supervisory, review or other influential position on the performance evaluation, pay or benefits of a family member or significant other;
- Receipt of a loan or a loan guarantee from the company;
- Sales or purchases of goods or services to or from PharmaFarm
- Any situation in which, without proper authorization, you are required or tempted to disclose, or do disclose, any trade secret, confidential or proprietary information or intellectual property of the company or its collaboration partners.

If you have any questions regarding activity that may create a conflict of interest, please discuss the situation immediately with your supervisor, general manager or an officer of the company. Disclosure to the company is your responsibility.

4). Related Party Transactions

A transaction involving both PharmaFarm and one of its directors, officers or significant shareholders which presents an actual or potential conflict of interest with the persons' duties at PharamFarm is considered a "related party transaction." The Board of Directors has adopted a policy with respect to disclosure to and review related party transactions. A copy of the company's Related Party Transaction policy will be available to each director and officer of the company.

5). Company Property and Corporate Opportunities

Proper protection and use of company assets, including proprietary information, is a fundamental responsibility of each employee and director. Employees and directors must comply with site security programs to safeguard physical property and other assets of the company against unauthorized use or removal, as well as against loss by criminal act or breach of trust.

Employees and directors must not (a) take for themselves personally or for family members or other businesses any opportunities that are discovered through the use

of PharmaFarm property, information or position; (b) use any PharmaFarm property, information or position for personal gain; or (c) compete with the company. Each employee and director has a duty to the company to advance its legitimate interests whenever the opportunity to do so arises.
Employees and directors are to use company property only for legitimate business purposes. Employees should not have an expectation of privacy with respect to company equipment. Employees and directors may not use or remove from company premises any company property or services for any personal benefit or the personal benefit of anyone else. If an employee or director has a question in this regard, he/she should consult his or her supervisor or the general manager.
Each employee of the company executes a confidentiality and inventions agreement upon joining the company. Under this agreement, each employee assigns inventions made in the course of employment to the company. Employees must promptly disclose all inventions to the company, record them as instructed by the company and execute such documents as may be requested by the company in order to assign the inventions to the company.

6). Accurate Retention of Business Records; State Reporting Obligations
Each employee and director must record information completely, accurately, honestly and in a timely manner. Employees and directors should use good judgment and common sense when preparing any company document and ensure that the document objectively and accurately reflects the facts of the situation it addresses. Accurate information is essential to PharmaFarms' ability to meet its legal and regulatory obligations.
Documents that require signatures, such as production, security procedures, tracking or quality assurance documents or expenditure authorizations, must be actually signed by the person whose name appears on the document. This requirement applies to electronic as well as handwritten signatures.
All company books, records and accounts must be maintained in accordance with all Department of Consumer Protection and all applicable regulations and standards and accurately reflect the true nature of the transaction they record. Financial records must accurately reflect all transactions and conform to generally accepted accounting principals. In line with applicable U.S. laws, no entry may be made on the company's books or records that intentionally hides or disguises the true nature of any transaction. No accounts, assets or funds may be established that are not disclosed or recorded in the company's accounting records.

Laboratory notebooks must be used and maintained by employees in accordance with the company's laboratory notebook policies and procedures. Keeping lab records properly is essential for the PharmaFarms' proprietary assets.

It is very important that employees and directors do not create, or participate in the creation or perpetuation of, any records that are intended to mislead anyone or conceal any improper act or conduct.

7). Confidential Information

Employees must maintain the confidentiality of information entrusted to them by PharmaFarm or other companies with which we have business relationships, including our vendors, suppliers, dispensaries, and partners except when disclosure is legally mandated or covered by an appropriate confidentiality agreement. Un authorized disclosure of confidential information is prohibited. PharmaFarm training programs and the Employee Confidentiality and Inventions Agreement that each employee signs when joining PharmaFarm, cover in detail the obligations of employees regarding confidential information.

8). Social Media

Employees are expected to use good judgment when using social media and to ensure that their activities are consistent with PharmaFarm policies, including the policies on protection of confidential corporate information and intellectual property.

9). Employment Practices

Health and Safety. PharmaFarm is committed to providing its employees with a safe and healthy work environment. To support that commitment, employees must abide by all safety rules and practices and assume responsibility for taking the necessary precautions to protect themselves and their co-workers. Employees are also responsible for immediately reporting accidents, injuries and unsafe practices or conditions, and for taking appropriate, timely action to correct unsafe conditions.

To help ensure a safe work environment, PharmaFarm prohibits threatening, reckless or violent behavior by employees, possession of weapons on company property or while conducting company business and willful destruction of property.

PharmaFarm is also committed to a drug-free workplace. The misuse of drugs or alcohol, both legal and illegal, while on company premises or business interferes with a safe, healthy and productive work environment and is prohibited. Specifically, PharmaFarm prohibits the use, sale, purchase, transfer or possession of illegal drugs (or any offer to do so), or the abuse of legal drugs or alcohol, on its premises, in its vehicles and while conducting company business. Management will consider disciplinary actions, up to and including termination of employment, for violations of these policies and procedures. For additional information see the Employee Handbook.

Treatment of People. The diversity and talent of PharmaFarm employees represents a highly valuable company asset. Consistent with our respect for individual employees, PharmaFarm is committed to providing a work environment free from discrimination based on race, color, religion, sex, pregnancy, sexual orientation, national origin, ancestry, gender identity, physical or mental disability, age, medical condition (including genetic characteristics), veteran or marital status or any other characteristics protected by applicable federal, state or local laws in the U.S. This means that we comply with applicable employment laws, including laws against discrimination, in all aspects of employment including recruiting, hiring,

compensation, promotion and termination. It also means that PharmaFarm does not permit conduct that creates an intimidating hostile or offensive work environment as defined under employment law. Such conduct may include but is not limited to racist, sexist or ethnic comments or jokes; sexual advances or inappropriate physical contact; or sexually-oriented gestures, pictures jokes or statements. Additional information on PharmaFarm's polices can be found in the Employee Handbook.

If an employee believes that he/she is a victim of unlawful discriminatory or harassing conduct, he/she should ask the person offending him/her to stop and let the person know the action is unwelcome. If an employee is not comfortable with a direct approach, or if it fails to solve the problem, the conduct should be reported to his/her supervisor or the general manager.

The company prohibits retaliation against any individual who in good faith reports discrimination or harassment., who assists others in making a report, who cooperates in a harassment investigation or who files a claim with the Department of Consumer Protection or any other government agency. Any individual who experiences, witnesses or becomes aware of any conduct he or she believes to be retaliatory should immediately report such conduct to her or his manager and to the general manager.

10). Product Quality; Compliance

The safety and quality of PharmaFarm products and services are essential to physicians and their patients and are key to our mission and values.

The company maintains quality and regulatory compliance systems that conform to our internal requirements and comply with applicable Department of Consumer Protection rules and regulations. These systems are and will be described in our quality policies and standard operating procedures and training programs adopted by the company. Employees should be familiar with these systems and work with their supervisors to obtain all necessary training. Management will consider disciplinary actions up to and including termination of employment for violations of the company's quality system policies and procedures.

An employee who violates PharmaFarms' quality policies, practices and procedures may be personally liable for intentional violations of regulatory and legal requirements. Deliberate deception or fraud is not tolerated by the company. Employees in a supervisory capacity may be liable for violations committed by employees under their supervision. Employees are expected to exert due diligence in preventing and detecting violations of laws and regulations. Any questions concerning potential violations may be referred to your immediate supervisor and the general manager.

As a medicinal cannabis company, the company is required to follow Department of Consumer Protection regulations governing the manufacture, marketing and

distribution of its products.

11). Sales and Marketing Practices
PharmaFarm products must be marketed and sold fairly and honestly, solely on the basis of their quality, capabilities, price, service level and other legitimate attributes. The company intends to succeed in the marketplace through superior performance, not by unethical or manipulative practices. Each employee and director must treat dispensaries honestly and fairly. Employees should not make false or misleading remarks or about competitors of the company, their products or their services. Each employee and director must avoid deprecation and criticism of competitors, their products or services, but employees and directors may state truthful descriptions of specifications and shortcomings of such products or services.
Advertising, Sales and Packaging. Each employee, in performing his or her duties, is responsible for truthfully conveying product attributes. An employee must not misstate facts or create misleading impressions in any labeling, advertising, packaging, literature or public statements. Employees also must not promote a product for a use other than that specified in the Department of Consumer Protection approved product label. Omissions of important facts or wrongful emphasis of material that may be misleading or untruthful is legal. Many laws, regulations, guidelines, policies and procedures are applicable to the sale and marketing of our products. In Connecticut., these include federal and state regulations. PharmaFarm provides specific training in these matters to the sales and marketing associates and others in the company involved in these activities. Management will consider disciplinary actions, up to and including termination of employment, for violations of these laws, regulations, policies and procedures.

In the case of products made available under named patient programs (P.A.V.E. The Way and Office of the Aging.), applicable rules in the relevant jurisdiction must be followed. Relevant healthcare professionals and patients may be made aware of the availability of a product under these programs and educational team may provide medical resource to institutions that comply with the program, but product promotion is prohibited.

12). Gifts, Gratuities, Bribes and Kickbacks
Giving, offering or promising to give gifts, gratuities or entertainment that are not reasonable complements to a business relationship, but that are primarily intended to obtain sales or otherwise win favor or influence, must be avoided with all parties with whom the company does business. Paying, offering, or promising to pay bribes or kickbacks to anyone or business to secure business is not only unacceptable, it may result in criminal prosecution for all parties involved.

Payments or any advantages or benefits in kind (including charitable donations) to induce dispensaries to agree to purchase or recommend products, or physicians to recommend the purchase of our products, is illegal, these practices are strictly prohibited.

Inexpensive non-cash gifts, gratuities and entertainment of modest value may be permissible business courtesies when dealing with healthcare professionals and dispensaries however it is only allowed with prior approval from management in writing. Such business courtesies should be related to a legitimate purpose and otherwise in compliance with the company's policies. (see Policy On Interactions With Healthcare Professionals.)

13). Grants and Sponsored Trips

In the normal course of conducting business in our industry we may have opportunities to foster knowledge of the company, its products and facilities, or to enhance the level of medicinal cannabis practice by; a). award grants for education and other studies; b). sponsoring medical seminars; c). sponsoring trips for professional medicinal cannabis meetings, seminars, tradeshows, workshops or other; d). paying speakers' fees.

The company's bookkeeper will establish control procedures for such payments to ensure compliance will all company accounting requirements, federal, state and local laws.

Special training is provided to employees involved in the marketing and sale of the company's products and related activities to help ensure compliance with the rule, regulations and reporting requirements of the Department of Consumer Protection.

14). Competitive Information and Antitrust

Competitive Information. Gathering information about competitors, when done legally and ethically, is a legitimate business activity that can increase our understanding of the marketplace. However, while competitive intelligence is important, employees and directors must observe accepted standards of fair conduct and legality when obtaining this information. No information should be sought, obtained or used in a manner that would violate antitrust laws, laws protecting proprietary information or confidential relationships between employees and employers. For example, PharmaFarm employees should not be requested to reveal trade secrets of their former employers.

15). Antitrust

It is PharmaFarms' policy to comply fully with the antitrust laws that apply to our operations in the state of Connecticut. The underlying principle behind these laws is clear; a person who purchases goods in a marketplace should be able to select from a variety of products at competitive prices unrestricted by artificial restraints, such as price fixing, illegal monopolies and cartels, boycotts and tie-ins. PharmaFarm is committed to these principles of free and competitive enterprise.

As required by the Department of Consumer Protection, PharmaFarm may not; enter in an exclusive agreement with any dispensary facility; Refuse to deal with any dispensary facility that is wiling to deal with PharmFarm on the same terms and

conditions as other dispensary facilities with whom PharmaFarm is dealing with; either directly or indirectly discriminate in price between different dispensary facilities that are purchasing like grade, strain, brand, and quality of cannabis or cannabis product.

16). Acceptance and Solicitation of Gifts

In general, the solicitation or acceptance by employees or directors or their family members, of gifts, loans or other special preferences from a person or organization that does or wants to do business with PharmaFarm, or is in competition with PharmaFarm is not acceptable.

In his or her activities with PharmaFarm, an employee or director may not realize any profit apart from his or her compensation from the company. As an exception, an employee or director may accept unsolicited gifts of modest value extended as a business courtesy, if the gift will not compromise the employee's or director's ability to act in the best interests of PharmaFarm and will not be construed as a bribe or payoff. This might include modest sales promotion items or occasional meals, and should not include cash or cash equivalent. Any gifts that are not of modest value should be reported to the employee's immediate supervisor or, in the case of a director, the company's General Counsel so that the gift can be returned or disposed of in a manner deemed appropriate by PharmaFarm in its sole discretion. If an employee is in doubt as to the propriety of any gift, the employee should consult with his/her supervisor or the Directors should consult with the company's General Counsel.

17). Copyrighted Works

Copyright laws protects the original expression in among other things written materials, works of art and music and prohibits their unauthorized duplication, distribution and performance. This means we may not reproduce, distribute or alter copyrighted materials from books, trade journals, off the Internet, computer software, videotapes without permission from the copyright owner or its authorized agents such as a Copyright Clearance Center. Software used by PharmaFarm must be properly licensed and used only in accordance with that license. Using unlicensed software could constitute copyright infringement.

18). Environment

All employees are responsible for PharamFarms' compliance with environmental laws and regulations. Each employee has a duty to act in a responsible manner toward the environment. This means that each employee must, to the best of his or her ability, minimize the impact PharmaFarm products, processes and services have on the environment and act in accordance with applicable environmental rules and regulations.

19). Relations with Governments

All relations with Connecticut government agencies, officials and employees must be conducted with honesty and integrity and must be in compliance with the letter and

intent of applicable laws and regulations.
Political Contributions and Activities. Employees must act with integrity and obey the laws of the United States in promoting the company's position to government authorities and in making political contributions. Political contributions by the company to (or at the request of) any political candidates ma be prohibited or regulated under applicable U.S. election laws. Corporate funds may not be used to contribute to a political party, committee, organization or candidate in connection with a campaign in the state of Connecticut or the U.S. Any contribution of company funds or other assets for political purposes must be reviewed by the company's President and must be in accordance with PharmaFarm policies.

Good communications and relationships with federal, state and local municipal elected and appointed officials are very important to PharmaFarm. If an employee plans to interact with a federal or state government official including the Department of Consumer Protection as a representative of PharmaFarm concerning political issues, he or she must notify and coordinate with the company's General Counsel before proceeding.

Responding to Government Requests. It is PharmaFarms' policy to fully cooperate with all requests concerning company operations from federal, state and municipal government agencies. Access needs approval by the Department of Consumer Protection although there are emergency entry procedures as identified in the PharmaFarm employee handbook. In all cases employees must immediately inform PharmaFarm management of if director, the company's General Counsel prior to any communication with any person posing as a government official.

20). Waivers Under the Code of Conduct
While some of the policies contained in this Code must be strictly adhered to and no exceptions can be allowed, in other cases exceptions may be permissible.

Any request by an executive officer or director for a waiver of this Code must be in writing and addressed to the Chairman of the Board with a copy to the company's legal counsel. Any request by an employee who is not an executive office or director for a waiver of any provision of this Code must be in writing and addressed to the General Manager. With regards to executive offices and directors, the Board of Directors will have the sole and absolute discretionary authority acting upon such recommendation as may be made by the company's general counsel to approve any waiver from this Code. Any such waiver will be disclosed to the Company's stockholders as required by the applicable laws, rules and regulations.

With regards to an employee who is not an executive officer or a director the company's General Counsel will have the authority, acting in consultation with the Chairman of the Board, to approve any waiver from this Code.

21). Responsibility to Ask Questions

Every employee has the responsibility to ask questions, seek guidance and express concerns regarding compliance with the Code. If you encounter a situation or are considering a course of action and its appropriateness is unclear, your most immediate resource for any matter related to the Code is your supervisor. He or she may have the information you need or may be able to refer the question to another appropriate source. There may, however, be times when you prefer not to go to your supervisor. In these instances, you should feel free to discuss your concern with the General Manager.

22). Procedures For Reporting Possible Violations

If you wish report potential misconduct by another person or a violation of the Code, the company's anti-corruption policy or other company policies, you may report the misconduct or possible violation in accordance with the Company's Open Door Policy for Reporting Suspected Violations and Complaints. You are encouraged to report possible violations to a supervisor or the general manager. Cases of employment discrimination or workplace harassment may be reported using the procedures on the company bulletin boards or in the Employee Handbook.

Promptly report any complaints or observations of Code violations to your supervisor, and if you believe your supervisor has not taken appropriate action, you should contact the general manager. All information will be kept strictly confidential to the extent reasonably possible within the objectives of the Code. You should do so without fear of any form of retaliation. We will take prompt disciplinary action against any employee who retaliates against you, including potential termination of employment. Of course, knowing false and malicious reports will not be tolerated and will be subject to appropriate disciplinary action. It is our policy to employ a fair process by which to determine violations of the Code, the anti-corruption policy or company policies. When making a report, you are expected to promptly provide a specific description of the violation that you believe has occurred, including any information you have about the persons involved and the time of the violation.

23). Dissemination and Amendment

PharmaFarm reserves the right to amend, alter or terminate this Code at any time for any reason. This document is not an employment contract between PharmaFarm and any of its employees and does not alter PharmaFarms' at-will employment policy.

SECTION I BONUS POINTS

Sub-Section I.1 Employee Working Environment Plan

POLICY ON INTERACTIONS WITH HEALTHCARE PROFESSIONALS

PURPOSE

This document sets out the policy of PharmaFarm with respect to interaction of its personnel with Connecticut Department of Consumer Protection disease-specific healthcare professionals. It is the policy of PharmaFarm to promote or market its products consistent with all legal requirements including those of the Connecticut Department of Consumer Protection, the federal Anti-Kickback statute and False Claims Act, regulations and guidance issued by the Food and Drug Administration, guidelines issued by the Office of Inspector General of the U.S. Department of Health and Human Services, and the PhRMA Code on Interactions with Healthcare Professionals.

SCOPE

This policy applies to all PharmaFarm employees as well as consultants and contractors who interact with healthcare professionals on behalf of PharmaFarm.

For purposes of this policy, the term "healthcare professionals" is defined to include

1). A person licensed by Connecticut state law to prescribe drugs for human patients;
2). A medical student;
3). A member of a drug formulary committee. The term also includes physicians, optometrists, pharmacists, registered nurses, physician's assistants, and similar medical professions which are licensed under Connecticut state law to recommend medicinal cannabis.

GENERAL POLICES ON INTERACTIONS WITH HEALTHCARE PROFESSIONALS COMPLIANCE OBJECTIVES

PharmaFarm is subject to a variety state laws and regulations which govern its marketing and sales activities. These laws include regulations and guidance issued by the Connecticut Department of Consumer Protection, Food & Drug Administration ("FDA"), guidelines issued by the Office of the Inspector General of the U.S. Department of Health & Human Services ("OIG"), the PhRMA Code on Interactions with Healthcare Professionals and various state laws. Federal and state anti-kickback statutes prohibit payments that are intended to induce a doctor to purchase, use, prescribe, or recommend a company's prescription drug.

POLICY ON INTERACTIONS WITH HEALTHCARE PROFESSIONALS
For Internal Use Only – Not for Distribution

PharmaFarm personnel must be cognizant of these statutes whenever they interact with healthcare professionals. When meeting with physician or other healthcare professionals, PharmaFarm personnel should never provide them with items of value intended, directly or indirectly, to encourage them to recommend PharmaFarm products or for any reason whatsoever.

In addition the Department of Consumer Protection regulation is clear that " a physician that issued or intends to issue a written certification shall not directly or indirectly accept, solicit or receive anything of value from a producer, producer backer or production facility employee."

t is the policy of PharmaFarm to comply with the PhRMA Code, which imposes strict limits on gifts, meals and other activities with healthcare professionals in general. In all cases these decisions will only be made by senior management.

Compliance with the PhRMA Code is intended to reinforce the principle that a healthcare professional's care of patients should be based, and should be perceived as being based, solely on each patient's medical needs and the healthcare professional's medical knowledge, experience and judgment.

GUIDELINES FOR INTERACTIONS WITH HEALTHCARE PROFESSIONALS
GENERAL RULE

PharmaFarm personnel may not offer or provide an item of value to a healthcare professional with the intent of directly or indirectly influencing or encouraging that individual to recommend a PharmaFarm product, or as a reward for previously having done so. As a general matter, PharmaFarm personnel may not provide gifts to healthcare professionals. Consistent with existing laws, rules and regulations, there are certain limited exceptions to this policy, as set forth below.

GIFTS AND PROMOTIONAL ITEMS
PharmaFarm personnel may provide healthcare professionals or members of their staffs with items designed primarily for the education of patients or healthcare professionals on an occasional basis if the items are not of substantial value ($100 or less) and do not have value to healthcare professionals outside of his/her professional responsibilities. Examples of appropriate educational items include medical textbooks, subscriptions to relevant scientific journals, or copies of relevant clinical treatment guidelines. Non-educational items should not be offered to healthcare professionals or members of their staff, even if they are of nominal value

or are accompanied by patient or physician educational materials. Items intended for the personal benefit of healthcare professionals or their family members should not be offered or provided. At no time may PharmaFarm personnel provide a healthcare professional with a gift of cash or a cash equivalent. In addition, PharmaFarm personnel may occasionally give items to healthcare professionals that are designed to educate patients or that are designed for use by patients to assist in the administration of their treatment or management of their conditions. Such items should have a value of less than $100. Examples of appropriate gifts related to patient education include informational sheets or brochures, medical textbooks, anatomical model, or non-medication based patient starter kits. To be clear, providing non-educational information to healthcare professionals is not allowed, even if of minimal value.

ALL GIFTS OR PROMOTIONAL ITEMS MUST FIRST BE APPROVED BY SENIOR MANAGEMENT AND THE CONNECTICUT DEPARTMENT OF CONSUMER PROTECTION.

POLICY ON INTERACTIONS WITH HEALTHCARE PROFESSIONALS

PharmaFarm personnel may only utilize company-approved items for gifts. PharmaFarm personnel may purchase gift items for healthcare professionals using corporate funds only if;

1) The item has been approved for distribution to a healthcare professional in writing by the Connecticut Department of Consumer Protection.
2). The purchase has been approved in writing and in advance by Senior Management.

PharmaFarm associates may not obtain reimbursement of gift purchases for healthcare professionals that are made using personal funds without the written approval of Senior Management.

Product samples that are provided in accordance with applicable Connecticut Department of Consumer Protection legal requirements, are not considered gifts to healthcare professionals under this policy. This information will be forth coming.

MEALS and BEVERAGES

Connecticut Department of Consumer Protection permitting, PharmaFarm personnel may, on occasion, provide modest meals to healthcare professionals in connection with a legitimate business purpose, such as:

1). Meeting with healthcare professionals to discuss PharmaFarm products;
2). Providing scientific and educational information to healthcare professionals in therapeutic areas of interest to PharmFarm; or
3). Meetings related to bona fide consulting or research services from a healthcare professional.
4). In conjunction with an information presentation, it is appropriate for

to provide modest meals (e.g., sandwiches, salads or pizza) to healthcare professionals in office or hospital settings. These in-office meals should be provided only to healthcare professionals who work in the same office and only to physicians and staff who attend the representative's informational presentation. The location of the in-office presentation should be conducive to scientific or educational communication.

5). At least one PharmaFarm representative must be present whenever a meal is provided to a healthcare professional. Dropping off meals, or providing coupons or gift certificates for meals, is not permitted.
It is not appropriate to include a spouse or guest of a healthcare professional at a meal, regardless of who pays for their meal, unless the spouse or guest would independently qualify as a healthcare professional for whom the informational presentation qualify as a healthcare professional for whom the informational presentation is appropriate.

PharmaFarm may not provide or host meals for healthcare professionals attending continuing medical education events, except that the event provider, at its own discretion, may apply for financial support to provide meals for event participants. However, at third party medical or scientific conferences at which medical education activities comprise only a part of the conference, it is appropriate to sponsor a meal or reception at the conference if it is permitted by the group holding the conference and the meal or reception is separate from the medical education portions of the conference.

ALL FINANCIAL SUPPORT FOR EVENT OR MEAL FUNDING MUST FIRST BE APPROVED BY THE CONNECTICUT DEPARTMENT OF CONSUMER PROTECTION

ENTERTAINMENT

The provision of entertainment or recreational items (e.g., tickets to concerts, sporting or other recreational events) to healthcare professionals **is prohibited.** This prohibition extends to entertainment in connection with company-sponsored meetings with consultants, advisors or promotional speakers.

TRANSPORTATION AND LODGING

PharmaFarm may pay or reimburse reasonable expenses incurred by a healthcare professional, including the cost of reasonable lodging, transportation and meals, who is engaged in bona fide consulting, speaking or investigator services on behalf of PharmaFarm in accordance with the company's travel and expense policy. The arrangements for such payments must be included in a written agreement describing the consulting, speaker or investigator services that is executed prior to the healthcare professional performing the covered services.

ALL TRANSPORTATION AND LODGING MUST FIRST BE APPROVED BY SENIOR MANAGEMENT AND THE CONNECTICUT DEPARTMENT OF CONSUMER

PharmaFarm personnel may not pay for transportation and/or lodging for

healthcare professionals to attend programs such as promotional speaker programs or medical or professional conferences unless the healthcare professional's attendance at the program is in connection with bona fide consulting, speaking or investigator services on behalf of the company.

Financial support should not be offered for the costs of travel, lodging, or other personal expenses of non-faculty healthcare professionals attending third-party scientific or educational conferences or professional meetings, either directly to the individuals attending the conference or indirectly to the conference's sponsor. Similarly, funding should not be offered to compensate for the time spent by healthcare professionals attending such conferences or meetings.

EVENTS AND PROGRAMS

PharmaFarm may on occasion sponsor a promotional program where the audience consists of both healthcare professionals and non-professionals. Generally, any gift, meal or entertainment provided at such events must comply with the provisions set forth in this policy. Speaker programs may include modest meals offered to attendees and may occur in locations outside of an office or hospital setting, so long as the programs occur in a venue that is conducive to scientific or educational communication.

As this policy is applied to exhibit booths sponsored by PharmFarm at medical or scientific conferences, light snacks, non-alcoholic beverage service or other minimal food costs items are not considered meals under this policy.

CONNECTICUT STATE LAWS

There are a variety of Connecticut state laws that govern PharmaFarms's interactions with healthcare professionals whom are licensed by the state for recommending medicinal cannabis for the disease-specific treatment of patients.

PharmaFarm is required to submit any marketing, promotion, programs or any other activities to the Connecticut Department of Consumer Protection for purpose of review and to obtain written consent to proceed with any such activity prior to its enactment.

SECTION I. BONUS POINTS
Sub-Section I.2 Compassionate Need Plan

P.A.V.E. The Way
Program Assistance for Veteran Empathy

Program Objective
The P.A.V.E. The Way program will enable U.S. veterans suffering from state-specific medicinal cannabis treatable diseases, to access PharmaFarm cannabis medication from their local dispensary based on eligibility, at reduced or no cost to the veteran.

Program Partnerships

- VA Connecticut Healthcare System
- Connecticut Department of Social Services
- Wallingford-Meriden Veterans Service Center
- Masonicare Facility, Wallingford
- All licensed Connecticut Dispensaries

Veteran Criteria

- Identification card issued by the state for the CT medicinal cannabis program.
- Meets the necessary requirements of the veterans' assigned dispensary as a registered patient or caregiver.
- Is registered in the VA Connecticut Healthcare System.
- Is registered with the Connecticut Department of Social Services.
- Verifiable need by income level, documentation required.
- Meets Pharmafarm's veteran patient criteria for program acceptance.

Priority will be given to veterans from the Wallingford- Meriden area.

Dispensary Interaction

- The company will meet with all licensed dispensaries to discuss the program parameters and to insure it meets any dispensary-specific criteria.
- If a specific dispensary requires a "handling charge" for the function of expediting P.A.V.E. to the veterans using their

dispensary, this will be negotiated at a fair and agreed upon price

- It is a goal to make this program available state-wide.
- Communicate with the dispensaries on a regular basis to insure program quality, consistency and on-going improvement.

Other Information

- P.A.V.E. applications will be made available at the;
    1). VA Connecticut Healthcare System offices
    2). Connecticut Department of Social Services
    3). Wallingford Veterans Service Center
    4). Masonicare Facility, Wallingford
    5). All licensed Connecticut Dispensaries
    6). On the PharmaFarm website
- PharmaFarm will review all application information, which will include the veteran's approval to contact the necessary state agencies, their dispensary and any other resources required to facilitate an affirmative decision.
- As part of this application process, PharmaFarm will request that the veteran agree to participate in research and development questionnaires, focus groups, one-on-one interviews and clinical studies.
- Pending patient approval, to meet with the veterans' medical professionals to participate in patient-based questionnaires and other forms of agreed upon feedback from the physicians' perspective.

Program Budget: Year 1

- PharmaFarm is committed to contributing no less than 1000 ounces of medicinal cannabis to the P.A.V.E. program in Year 1. Year 2 goal will be to double this amount.
- Projected medication pricing structure to P.A.V.E. approved veterans;
    1). Tier 1 – 100% complimentary
    2). Tier 2 – 75% reduction in cost.
    3). Tier 3 – 50% reduction in cost.
    4). Tier 4 – 25% reduction in cost.

SECTION I BONUS POINTS
Sub-Section I.3 Research Plan

TEAM MEMBERS

John Arnett, PhD	Chemist, pharmaceutical product development, volatile oil extraction and phytochemical isolation specialist.
Ralph Dileone, PhD	Research Lab, Psychiatry and Neurobiology, Yale School of Medicine
Rose Habib	Cannabis extraction and unit dose product specialist.
David Kimmel	President, Vintage Foods Ltd./PharmaFarm
Steve Kushner	Nutraceutical and cosmeceutical specialist.
Michael Nevas	Lead Grower, PharmaFarm

OBJECTIVE

The preliminary objective of the company's research and development program is to cultivate and manufacturer cannabis medication that will be;

- isolated by phytochemical and arranged in different configurations of cannabinoids, terpenoids and flavonoids to target specific neuro mechanisms that address state-specific disease's and the potential treatments thereof.
- precise in its formulation and compounding to create meter unit-dosed pharma-based delivery systems.
- standardized for consistency, safety and patient security
- GMO-free and organic

NEUROPATHIC FOCUS: APPETITE STIMULATION, DRUG ADDICTION and DEPRESSION

PROJECTED TIMELINE

YEAR 1-2	Research and Development (outlined in this document) Phase I Phase II Phase III Phase IV
YEAR 3	Clinical Studies and Trials
YEAR 4-5	FDA Approval
YEAR 5-6	Product Launch

PHASE I
Research and Background Development

Start Date: March 4, 2013
Completed: August 15, 2013

Team Participants: J. Arnett
D. Kimmel
S. Kushner

1). Identify primary cannabinoids, terpenoids and flavonoids found in heirloom and hybridized cannabis strains. Initial targets include:

CANNABINOIDS	CBD	cannabidiol
	CBDA	cannabidiolic acid
	CBG	cannabigerol
	CBGA	cannabigerolic acid
	CBN	cannabinodiol
	THC	tetrahydrocannabinol
	THCA	tetrahydrocannabinolic acid
TERPENOIDS	Borneol	
	Caryophyllene	
	Cymene	
	Limonene	
	Linlool	
	Myrcene	
	Pinene	
	Terpineol	
FLAVONOIDS	Apigenin	
	Cannflavin A	
	Quercetin	
	Sitosterol	

2). Source all published information to identify by percentage, the cannabinoid, terpenoid and flavonoid phytochemicals found in representative cross-sections of heirloom and hybridized Indica and Sativa strains.
3). Source all published information to identify the clinically documented benefits, either for disease and illness treatment, that these phytochemicals deliver to the body, individually and synergistically.
4). Using currently available technical, manufacturing and clinical information, identify the optimum delivery forms of these phytochemicals for the body.

5). Source, purchase and test synthetic terpenoids and flavonoids from chemical manufacturers including Lebermuth, Bell Chem and ParChem for;
   a). Terpenoid content by percentage
   b). Organoleptic qualities
   c). Topical and oral efficacy by strength values
   d). Purity

6). Source FDA approved, naturally-occurring botanical-based raw materials that have high concentrations of one or more of the identical terpenoids and flavonoids that are found in cannabis.
7). Review clinically data on the benefits of these non-cannabis based materials and how they may correlate to any clinically supported information on cannabis in analogous application.
8). Identify all the melt points of cannabinoids, terpenoids and flavonoids and the separation and isolation technology that will best serve these phytochemicals while minimizing damage to their construct and efficacy.
9). Specify purchasing requirements, amounts and costs for all raw materials and make the necessary arrangements for import and delivery to the lab for testing.
10). Complete review of all research and background development with team to insure all objectives have been met and determine if additional research is required and in what areas.

PHASE II
Equipment Testing, Terpene Isolation, Flavonoid Isolation and Laboratory Testing

Start Date: August, 2013
Completion Date: April 2014

Team Participants: J. Arnett
R. Dileone
D. Kimmel
S. Kushner

1). Coordinate programming with Dileone laboratory to determine the methodology of terpene selection, flavonoid selection and the synthesis of both for scheduled mice experimentation.
2). Commence preliminary isolation of terpenoids to verify the processes best suited for purity, yield, cost and minimal damage to the phytochemicals.
3). Begin small batch isolation production on Dileone lab specific terpenoids.
4). Submit isolated individual terpenoids to the Dileone Lab for scheduled mice experimentation.
5). Analyze all results from the Lab, discuss any changes required for next steps and if additional testing is required on this step
6). Submit blended terpenoids to the Dileone Lab for scheduled mice experimentation.

7). Analyze all results from the Lab, discuss any changes required for next steps and if additional testing is required on this step.
8). Commence isolation of flavonoids to verify the processes best suited for purity, yield, cost and minimal damage to the phytochemicals.
9). Submit isolated individual flavonoids to the Dileone Lab for scheduled mice experimentation.

10). Analyze all results from the Lab, discuss any changes required for next steps and if additional testing is required on this step.
11). Submit blended flavonoids to the Dileone Lab for scheduled mice experimentation.
12). Analyze all results from the Lab, discuss any changes required for next steps and if additional testing is required on this step.
13). Submit blended terpenoids and blended flavonoids to Dileone lab by percentage for scheduled mice experimentation
14). Analyze all results from the Lab, discuss any changes required for next steps and if additional testing is required on this step.
15). Collect all data reported by Dileone Lab to team for review process.
16).. Data review by team for determination of results, next steps and any adjustments required based on terepenoid and flavonoid experimentation.

PHASE III

Objective: *Equipment Testing, Cannabis Extraction, Cannabinoid Isolation, Laboratory Testing*

Start Date: April 2014
Completion Date: Dec, 2014

Team Participants: J. Arnett
R. Dileone
Rose Habib
D. Kimmel
S. Kushner
Michael Nevas

1). Begin cannabis strain development targeted to enhance specific terpenoids, flavonoids and cannabinoids levels. This process is ongoing.
2). Commence isolation of cannabinoids to verify the processes best suited for purity, yield, cost and least damage to the phytochemicals.
3). Begin small batch isolation production on Dileone Lab specific cannabinoids.
4). Submit isolated individual cannabinoids to Dileone Lab for scheduled mice experimentation.
5). Analyze all results from the Lab, discuss any changes required for next steps and if additional testing is required on this step.
6). Submit blended cannabinoids to Dileone lab by percentage for scheduled mice experimentation.

7). Analyze all results from the Lab, discuss any changes required for next steps and if additional testing is required on this step.
8). Submit cannabinoids and terpenoids to Dileone lab by percentage for scheduled mice experimentation. Determination to be made on actual make-up of blend; singular cannabinoids with blended terpenoids, blended cannabinoids with singular terpenoids or both.

9). Analyze all results from the Lab, discuss any changes required for next steps and if additional testing is required on this step.
10). Submit blended cannabinoids and flavonoids to Dileone lab by percentage for scheduled mice experimentation. Determination to be made on actual make-up of blend; singular cannabinoids with blended flavonoids, blended cannabinoids with singular flavonoids or both.
11). Analyze all results from the Lab, discuss any changes required for next steps and if additional testing is required on this step.
12). Submit blended cannabinoids, terpenoids and flavonoids to Dileone lab by percentage for scheduled mice experimentation.
13). Analyze all results from the Lab, discuss any changes required for next steps and if additional testing is required on this step.
14). Collect all data reported by Dileone Lab to team an organize review process.
15). Full data review by team for determination of results, next steps and any adjustments required based on cannabinoid, terepenoid and flavonoid experimentation.

PHASE IV
Product Development, Delivery System Configuration, Pre-Clinical Study/Trial Development

1). Product engineering and development for patient-friendly delivery systems to be part of upcoming clinical studies and trials data mining.
2). Dileone Lab with Phamafarm to create the road map on processes and methodology for studies and trials. Determinations to be made with team on;
    a). Goals and objectives
    b). Program methodology and protocol
    b). Phytochemical formulations
    c). Organoleptic qualities
    d). Amount's required
    e). Delivery systems
    f). Time line
    g). Outside consultants if required
    h). Projected costs
3). Make determinations on extract manufacturing, delivery system, packaging requirements and lead-time needed to prepare for any study or trial to support the identified criteria above.

4). Interact with team to address any issues requiring attention during pre-study organization and preparation.

SECTION I. BONUS POINTS
Sub-Section I.4 Community Benefits

Our YEAR 1 focus will be in our own backyard, the actual community that our facility will be located in. In YEAR 2, the company fully expects to broaden its community-based support outreach program to other parts of the state, a process that will continue to expand in future years.

YEAR 1: WALLINGFORD-BASED COMMUNITY SUPPORT

EDUCATIONAL SUPPORT

- Wallingford Public Library educational presentations on "Understanding Medicinal Cannabis as a Treatment Option."
- Wallingford Senior Center education presentations on "Understanding Medicinal Cannabis as a Treatment Option for Seniors"
- Wallingford Masonicare facility education presentation on "Understanding Medicinal Cannabis as a Treatment Option for Veterans, Seniors and State-Specific Diseases.
- Town of Wallingford Board of Education in concert with Youth and Social Services, controlled substance abuse educational presentations and workshops "To Cool For School - An adult conversation about drug abuse."
- Town of Wallingford Health Department educational presentations on "Understand Medicinal Cannabis as a Treatment Option" and any other activities that the Department of Health would request our participation in.
- Town of Wallingford Police Department education presentation on medicinal cannabis "From Seed to Sale." A forum for education, information and understanding on all things medicinal cannabis.
- Town of Wallingford Veterans Service Center educational and program counseling.

DIRECT FINANCIAL SUPPORT

- Town of Wallingford Public Celebrations Committee and Parks & Recreational Programs on a per event basis.
  represent business support on this committee.
- "P.A.V.E. The Way" program as identified in Section I, Sub-Section I-2.
- A financial contribution to the Wallingford Fire Department.

- Town of Wallingford, Office of the Aging to make available medicinal cannabis aid on a case-by-case basis, with Department of Consumer Protection approval.
- Fully loaded Apple Macbook Pro laptop computer to a graduating student from both Lyman and Mark T. Sheehan High School who will be pursuing education in the field of medicinal cannabis or health and wellness.

OTHER SUPPORT

- Interface with Town of Wallingford Police Youth Division Adolescent alcohol and drug abuse information, assessment and referral program for any support and assistance.
- Supply volunteers for community sponsored events and activities.
  - Santa Hotline
  - A Goblin Gathering
- Town of Wallingford Parks & Recreation Programs
  - Health & Fitness: Qigong Classes for Seniors, Others – Host/Sponsor
  - Visual Arts: The Art of Halloween Pumpkin Carving – Host/Sponsor
  - Early Childhood Development: Making Baby Food – Host/ Sponsor
  - Celebrate Wallingford – Participant and Co-sponsor
  - Annual Wallingford Holiday Stroll – Co-sponsor
  - "9 and a Chicken" – Co-sponsor
- WE CARE Program Wallingford Early Childhood Alliance Resource Center Mommy Made and Daddy Too! (Doubleday 1990, 2002 update) baby, toddler and family fresh food preparation and educational program on parenting and healthy eating.

SECTION I. BONUS POINTS
Sub-Section 1.5 Substance Abuse Prevention Plan

OBJECTIVE

To create, develop and implement a student-participatory, cannabis-based workshop "Too Cool for School – A Conversation About Cannabis Abuse." Targeted to adolescents and young adults with the goal of exploring and understanding some of facts surrounding cannabis use, health and growing up. The conversation has been broken down into four primary headings;

- **"Medical marijuana and why only truly <u>sick</u> people use it. "**
- **"Recreational marijuana; are you an abUSER?"**
- **"You Are What You Eat and Do!"**
- **"Too Cool For School"**

PROGRAM DEVELOPMENT PARTICIPANTS

- The Wallingford Department of Youth and Social Services
- Mayor's Council on Substance Abuse Prevention
- The Wallingford Health Department
- The Town of Wallingford Police Department Youth Services Program
- Marijuana Anonymous
- University of Connecticut Health Center
- Resonating Wellness, LLC

PROGRAM LENGTH

1 hour and 30 minutes - questions and answers throughout.

THE MEDICAL ISSUES

What is medical marijuana and why only <u>truly</u> sick people use it.

Issues to be discussed in an open forum town hall conversation.

- How the medication works.
- What diseases are treatable and the seriousness of these illnesses.
- Why patients do not smoke pot or smoke anything else.
- What are the drawbacks of medicinal cannabis.

A state registered medical cannabis patient will be part of the conversation to talk about;

- Their illness and its impact on their life.
- Using cannabis medication for state-specific disease treatment.
- "Why I call it medication."
- Does recreational marijuana do the same thing?

THE RECREATIONAL ISSUES

Recreational Marijuana: Are you an abUSER?

The following questions will be explored in an open forum town hall conversation to help one understand whether marijuana is more of a problem in than they realize;

- When did pot smoking no longer become fun?
- Do you get high by yourself?
- Is it hard to imagine a life without marijuana?
- Do you find that your friends are determined by your marijuana use?
- Do you smoke marijuana to avoid dealing with your problems?
- Do you smoke pot to help you cope?
- Does your marijuana use let you live in your own private world?
- Has your use of marijuana caused problems with memory, concentration, or motivation?
- When your stash is nearly empty, are you anxious or worried about how to get more?
- Do you plan your life around getting high?
- Have friends or family ever said that your pot smoking is hurting your relationship with them?

THE HEALTH ISSUES

You Are What You Eat and Do

Issues to be discussed in an open forum town hall conversation.

- What are the health concerns around marijuana and its abuse?
- Do you think you are invincible? Wait till your 50….it happens.
- You are what eat and do.
- Take responsibility for your own health and wellness.

THE SOCIAL ISSUES

Too Cool For School

- Being cool is not all it is cracked-up to be. It is not measured by how high you can get, but how high you can climb.
- Stress and escape, there are tools other then pot and alcohol.
- Where to put your "energy" and how to focus on the things that are important, maybe not today but for sure tomorrow.

- There is life after high school and it is large, how to be sure you are ready for it.

SECTION I. BONUS POINTS
Sub-Section I.6. Environmental Plan

PharmaFarm is committed to minimizing the ecological footprint of its production facility and its overall business operations.

INITIATIVES

DELIVERY SYSTEMS

- From the perspective of individual patients, a single Cannabis cigarette represents 2 pounds of CO2 emissions, an amount equal to running a 100-watt light bulb for 17 hours assuming average U.S. electricity emissions.
- The Company's intent is to market and promote non-combustion based delivery systems.

LOCATION

- It is intended that the production facility be located in the town of Wallingford, a producer of their own lower-cost electricity.
- The Company anticipates using as much electricity as possible during off-peak hours to lower the stress placed on the electricity producer's generators and power grid.

HVAC

- The Company intends to specify higher efficiency commercial- or industrial-rated air conditioning equipment, including variable frequency drives (VFDs) for HVAC equipment.

METERING

- As part of our goal to understand how our energy is being used, we will employ the use of metering equipment to determine our usage, create a benchmark, and track progress toward reduction goals.

SOLAR

- Once the production facility is up and running and we have determined our patterns of use we intend to have the facility reviewed by an energy service

company to explore the feasibility of installing solar panels on the roof of the building.

LIGHTING

- All General lighting will be solid state, primarily LED type lighting.
- Grow lighting will be a combination of high output T5 Fluorescent, Light Emitting Plasma, and energy efficient, long life 240 volt HID lighting.
- We will conduct research to determine if cost saving LED lighting will be effective lighting for the Grow lighting as well.

PACKAGING

- Our Packing and Packaging materials will be composed of recycled content wherever possible. We will attempt to minimize the use of non-recyclable packaging.

TRANSPORTATION

- The delivery vehicle will incorporate the use of a hybrid gas-electric, or fully electric motor.

PRINTING

- The Company will encourage a paperless mentality and will only print documents, forms and other information as required. All back-up electronic information will be kept on external drives. All paper used will be sustainable.

EQUIPMENT POWER DOWN

- During non-work hours, procedures will be put in place to turn off or power down non-essential equipment like office computers, cell phone chargers, printers, copier, microware, office gadgets and music systems.

EMPLOYEE BREAK AREA

- All equipment specified for this area will be energy-efficient rated.

RECYCLING

- The Company will recycle appropriate paper, glass, cans and plastic materials.

ELECTRONIC EQUIPMENT

- Old or no longer useful computers, printers, cameras or other electronics equipment will either be donated or recycled appropriately.

JUNK MAIL

- The Company will endeavor to have its name removed from any and all direct marketing prospect's list.

OFFICE FURNISHINGS

- Sustainable materials for window treatments like hemp or bamboo curtains as well as rugs, chair materials and other fixtures.

EMPLOYEE

- Educate employees about eating sustainable and healthier foods. This would include eating less meat and other animal-based protein sources. Also to purchase products that are minimally processed and manufactured locally.

Attention: Department of Consumer Protection
SECTION B. Location and Site Plan

In our endeavor for Vintage Foods Ltd. be completely transparent in our application, we herewith are stating;

- The company's original location was targeted for 350 North Cherry Street Ext. Wallingford, CT.
- After many months of meetings with Mayor Wilkinson, Town Attorney Janice Small, P&Z Head, Kacie Costello and Youth Services Director, Craig Turner, the company was notified at the end of October that the Town of Wallingford had decided that "the conflict between Federal and State law was too great for them to reconcile" and on November 13th, we were supplied with the attached letter.
- Please note that up until this point, the company was operating under the impression given to them by these town officials, that locating in Wallingford was viable.
- After hearing about David Kimmel's comments at the symposium held by the UConn Law School on October 25th, Vintage Foods Ltd. was contacted by Jason Vincent, Vice President of the Norwich Community Development Corporation and the company was invited to review their town and potential locations for Vintage Foods Ltd. to consider.
- Vintage Foods Ltd. is now fully vested in locating in Norwich as Wallingford, even with our option to file a zoning amendment, has made it clear in their letter dated November 13th that it will

clearly be an uphill struggle and probably impossible to successfully accomplish, due to the lack of support from town leadership.

- Regrettably a significant about of energy was spent in developing our plans for Wallingford, and have included them in our permit application.
- Subsequently we are presenting Norwich as the first option for the company's location.

  Documents supplied for this application include;
  - Letter from City of Norwich Planning and Zoning
  - Letter from Ten Tech LLC (landlord)

  - Letter from the Norwich Community Development Corporation
  - Site plan
  - List of abutting properties within 1000 feet
  - Photos of building and location
  - Overview Photo of area
  - Site plan
  - The facility footprint

To be resubmitted in the next two weeks:

- The company's blueprint developed for Wallingford will be easily and quickly reconfigured for Norwich due to the building design (see Wallingford blueprint.)
- The security plan will be very similar, but it too will be reconfigured. (see Appendix A)
- Bonus Points Section I.4 and I.5 will also be resubmitted to be Norwich specific. (see current Bonus Points 1.4 and 1.5.

It is with embarrassment and apology that the company has to make this change however we now feel it is inevitable as Wallingford will make it very difficult, if not impossible for the company to locate in their town.

Thank you for your understanding.