



OPERATIONS PLAN

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SECURITY PLAN

Embarc San Luis Obispo has developed a comprehensive Security Plan and will implement and maintain strict procedures to ensure the health, safety, and security of employees, customers, and the San Luis Obispo community relative to Embarc's operations. The plan below has been prepared by professional security consultant Matt Carroll.

Transparency and communication with the San Luis Obispo Police Department are critical to successful operations. While we believe the following security measures demonstrate an unparalleled understanding of security and compliance based on our professional security consultant's significant relevant experience and our existing operations, we welcome the opportunity to partner with the San Luis Obispo Police Department to further detail and/or modify the Security Plan components to align with the Department's goals.

Foreword

Embarc acknowledges that there are risks in operating a cannabis-related business, including burglary, robbery, theft, diversion, minors accessing the premises or products, and risks to the safety of employees, visitors, and the general public. Embarc is committed to ensuring a safe environment that mitigates as much risk as reasonably possible. Risk mitigation strategies include, but are not limited to, implementing those security requirements mandated by the California Code of Regulations, Title 4, Division 19: Department of Cannabis Control (DCC) Medicinal and Adult-Use Commercial Cannabis Regulations and all applicable locally instituted commercial cannabis regulations.

This Plan will be implemented by Embarc's appointed Security Director and will be maintained to ensure its relevancy and efficacy throughout the life of the business. The plan will be audited at least annually thereafter, and immediately following any significant security breach or security incident to ensure that the plan remains effective and that areas needing improvement are addressed as they are discovered. The plan will remain available for review by regulatory agencies, and Embarc will work collaboratively with the Police Department and other agencies as necessary to ensure that the plan meets or exceeds those minimum requirements imposed by regulatory agencies and legislative changes.

The plan is intended to serve as a living document governing the business' security during its design and throughout operations. Embarc will maintain an Appendix containing current security policies and those records relating to security equipment, contracts, warranties, equipment specifications, maintenance schedules, access logs, training logs, and evidence of compliance with the routine security auditing aspects called for in this plan. The plan will be maintained in a manner that ensures sufficient detail is available to future managers who may be required to assume responsibilities as the Security Director. The plan will be held in confidence, stored securely, and accessible only to Managers and owners.

Security policies, procedures, and practices that are relevant to non-managerial employees, vendors, and visitors will be parsed from this plan and provided to such persons in a format appropriate for their training, testing, and accountability with respect to the plan.

Core Tenets

The following Security Plan is built on four critical program elements:

MANAGEMENT LEADERSHIP & EMPLOYEE INVOLVEMENT: Embarc will commit the necessary financial, human, and time resources to ensure that all persons on the premises are protected from the identified and typical safety hazards associated with our operations. Management leadership will be responsible for leading the design, implementation, and continuous improvement of the site's safety procedures, including avenues for employee involvement in safety decision making and problem solving. Activities will include designated safety observers, peer safety training, analyzing and protecting against safety hazards, and planning activities to heighten safety awareness. Our team will ensure that visitors to the site do not introduce preventable safety hazards and have knowledge of safety procedures applicable to the purpose and function of their visit.

WORKSITE SAFETY ANALYSIS: Embarc has and will continue to engage outside consultants as necessary to conduct baseline surveys that identify and develop preventative controls to address potential facility safety hazards. Management and employees will work together to organize and conduct site inspections to continually address safety hazards and ensure safety remains top of mind in every aspect of our operations.

HAZARD PREVENTION & CONTROL: Management and employees will work together to analyze safety hazards inherent to job functions and will find means to eliminate those hazards whenever possible.

COMPREHENSIVE ONGOING TRAINING: Employee involvement in our safety program is only successful when everyone receives sufficient training to understand how to fulfill their safety responsibilities and opportunities. All employees will be trained in an initial and ongoing capacity to recognize safety hazards and to report any hazard found to the appropriate team member so that it can be corrected as soon as possible. Safety procedures will be integrated into initial and ongoing employee training and will be provided to visitors on a case-by-case basis as it becomes relevant.

These core tenets have worked successfully across Embarc's existing operations to protect public and employee health and safety and will be similarly deployed here if selected to operate locally.

Plan Developer

This security plan was developed by Matt Carroll – the Security Chief of Embarc and the founder of Carroll Security Consulting, LLC (CSC). Unlike the masses who contract CSC for a limited engagement aimed at developing a security plan for application purposes, Embarc has retained CSC as a contract employee since inception. Beyond developing security plans for Embarc, CSC provides ongoing support, oversight and auditing of security services and strategies across Embarc's network of storefront retail locations in California.

Matt holds an A.A. in the Administration of Justice (Shasta College, 1997), is a graduate of a California Peace Officer Standards and Training Academy (Sacramento County Sheriff's Training Center, 1998), holds a B.S. in Criminal Justice (Sacramento State University, 2000), is a tactical communication instructor through the Verbal Judo Institute (2000), is a Crime Prevention Through Environmental Design practitioner (National Institute of Crime Prevention, 2009) and is an Emergency First Response Instructor (Emergency First Response).

Matt served in public law enforcement from 1997–2006 with the Sacramento County Sheriff's Department and the Sacramento-Yolo Port District Police Department. As port police officer, Matt was tasked with bringing the Port of Sacramento into compliance with post 9/11 maritime security requirements. This involved extensive security planning, development and implementation of access control, training and maintenance protocols, management of quarterly drills and semi-annual exercises in collaboration with the Federal, State, and local allied agencies. Matt's Facility Threat

Assessment and Facility Security Plans for the Port of Sacramento were deemed model plans and were later used by the US Coast Guard as templates to assist other western seaboard ports in the development of their own plans.

Matt served in the loss prevention and private patrol marketplaces from 1995–2020, serving in a range of capacities from covert surveillance to uniformed patrol & guard services to ownership of several security businesses based in the City of Sacramento. In 2003, Carroll co-founded Paladin Private Security in Sacramento (PPO 15029). Paladin was the largest mobile patrol service to operate from a single location anywhere in the United States; deploying upwards of eighty patrol cars daily at its peak and employing over two hundred, predominantly armed, security officers. Paladin served the security needs of commercial, residential, educational, entertainment, transportation, government, and cannabis entities. Matt co-founded the Sacramento Security Training Center (SSTC), a state licensed security and firearms training center (TFF1511, TFB1320) and Emissary Secure Transport (cannabis-exclusive armored carrier licensed by the California Highway Patrol).

As Matt's work in the security planning arena grew, Matt sold his interest in Paladin, SSTC and Emissary in order to focus his energies fulltime on consulting and planning services. Since 2015, Matt has been consistently engaged by the commercial cannabis industry on a national scale. To date, Matt has developed over 740 commercial cannabis security plans in 16 states – although predominantly in California. Matt's work in this regard has also attracted the public sector.

Since 2016, Matt has remained under contract with the Dixon Police Department and the Benicia Police Department as their cannabis security and compliance auditor. As a police consultant, Matt trains police and code enforcement personnel on cannabis regulations, assists in developing local regulations, reviews/scores cannabis business applications, interviews cannabis business applicants and conducts periodic security audits of cannabis businesses on behalf of those police departments contracting his services.

Matt has served as a subject matter expert in several civil litigation cases stemming from injury/death of cannabis retail workers. In developing security plans, Matt incorporates his far-reaching education and experience from nearly three decades of security and policing experience toward the creation of a premises that is an inherently unattractive target for external and internal threats alike—supported by detailed operating protocols.

Preventing Trespass

Embarc's proposed premises is a stand-alone business upon a single occupancy parcel. This affords Embarc both power and accountability as it relates to maintaining the premises free of trespassers, loiterers, or any other activities unrelated to the permitted business operations. Where a premises is collocated within a common interest development, an inherent lack of control and diminished ability to affect enforcement action results by virtue of California statutes limiting standing to those who are lawfully in charge of a premises. In the case of a multi-tenant environment (e.g. a "strip mall"), those persons unwanted by one business may be welcome guests of another – thus inhibiting the ability to lawfully control the conduct of all persons upon and about the premises.

Limited Access Areas

As outlined on the diagrams incorporated herein, all areas of the premises where cannabis goods will be stored, loaded, unloaded, or moved within the premises will be designated as limited access areas and restricted to specified employees based upon their role(s). All doors accessing a limited access area will be equipped with signage indicating the area beyond as a limited access area that is restricted to employees. Employee access to limited access areas will be role-based, with keys and credentials issued and collected daily during staff arrivals and departures.

Securing Cannabis and Cannabis Products

The customer-accessible retail areas of the premises will not contain live packaged cannabis goods. Displays accessible to customers will be empty packages and will be labeled as such (e.g. "Display Only – Does Not Contain Cannabis"). Cannabis will be stored and secured in three distinct manners within the premises:

Retail Delivery

Embarc is not engaged in Delivery at this time. Embarc will provide an addendum to this plan prior to initiating delivery operations.

Duty to Cooperate

Embarc will cooperate with the City of San Luis Obispo whenever the City Manager, or his or her designee, makes a request, upon reasonable notice, to inspect or audit the effectiveness of any Security Plan or any other requirement of State or Local regulations.

Crime Reporting

Within 24 hours of discovering a significant discrepancy in inventory, diversion, theft, loss, criminal activity by an employee or agent of the business, the loss or alternation or records or any other breach in security, Embarc will notify the San Luis Obispo Police Department. For the purposes of this section, a significant loss will be recognized by Embarc as a 5% discrepancy in its inventory as is the standard used by the State of California, or as is otherwise promulgated by the San Luis Obispo Police Department.

Restriction OF ACCESS BY MINORS

All patrons will be verified as 21 and over or 18 and over with a valid physician's recommendation prior to being allowed anywhere in the facility where commercial cannabis activity occurs.

EMPLOYEE SAFETY AND TRAINING PLAN

Embarc acknowledges that it bears the ultimate responsibility for security of the premises. The management team is responsible for all aspects of this security plan, including management of all security technology, transportation security, access control to facilities, training of employees, visitors and for the contracting and supervising of licensed security contractors. The Security Director or designated Manager on site will be responsible for theft prevention, plan auditing, systems testing and for ensuring that minors do not enter the premises.

The Security Director or designated Manager on site will ensure that all employees understand their respective security roles and responsibilities including the chain of command (in the event of any security breach). Employees at all levels will be trained to:

- Identify threats and vulnerabilities;
- Implement mitigating strategies;
- Understand when and why they could be targets; and
- How to respond accordingly.

Staff will be tested no less than annually regarding their knowledge of the premises' security strategies. Development of policies and procedures will be ongoing during and after the initial security planning process. The Security Director will continuously audit the Security Plan as the business evolves and will ensure appropriate training of employees as new procedures are implemented. To demonstrate that the employee understands the content of training delivered, all employees will be required to undergo an assessment. Assessments will include, at minimum, a hands-on demonstration by the employee as it relates to security policies or procedures included in the training.

Embarc will conduct regular drills at the premises to ensure that all employees understand how to respond to various emergencies or threats at the premises. Fire drills, armed robbery and burglary discovery drills are examples of drills that may be conducted on the premises as part of comprehensive security training.

Mandatory Security Training of Personnel

Employees working in the premises will complete introductory training relating to facility security prior to engaging in work on the premises. Training will include, at minimum, the following:

- Operation of security equipment within the scope of role(s);
- Inspecting and monitoring security equipment within the scope of role;
- Emergency notifications, response and reporting procedures;

- Effective patrolling of the premises;
- Identifying opportunities for diversion;
- Securing the premises and assigned work areas;
- Critical incidents, situational policies and procedures; and
- Proper method for securing cannabis and currency at the end of each work day.

Burglary/Theft Prevention Training

This facility maintains an array of security devices including contacts, motion sensors, cameras and related hardware. These devices are critical to the overall security of the premises and caution must be exercised by all occupants to ensure their continued effectiveness. Employees will be trained to:

- Report any damage to a security component immediately;
- Not tamper with any security component;
- Not block or cover any security component; and
- Not block access to security panels.
- Secure all doors when not in active use;
- Not prop any exterior door open for any reason at any time;
- Check the video monitor for unusual activity outside prior to exiting;
- Use the monitors to ensure no persons are lying in wait outside the door; and
- Not open any exterior door unnecessarily.
- Keep security procedures are confidential. Never discuss with third parties;
- Report any unusual behaviors or activities of others to the on-duty manager;

Managing Burglaries

- If evidence of a burglary is encountered (damaged door/window, evidence of ransacking), immediately notify the on-duty manager;
- Do not touch or move anything. Preserve the crime scene;
- Immediately secure all relevant areas and prevent anyone from entering; and
- Notify police via the non-emergency number.

In order to reduce take-over robbery attempts by way of employee ambush on departure, facility security policy requires that employees departing from work:

- Depart in pairs or groups;
- Depart only through the lobby doors, and only upon reviewing external camera views to ensure that no suspicious persons or activity are afoot nearby; and
- Immediately depart the premises and adhere to a strict prohibition of loitering on or about the premises.

CANNABIS INDUSTRY HEALTH AND SAFETY

All employers in the cannabis industry, including those who cultivate, manufacture, distribute, sell, and test marijuana products, must take steps to protect their employees from all health and safety hazards associated with their work.

Injury and Illness Prevention Program (IIPP)

Employers in California are required to take steps to protect workers from all workplace hazards that can cause injuries and illnesses. To protect workers, Embarc will establish, implement, and maintain an effective written Injury and Illness Prevention Program (IIPP). The IIPP includes many elements, such as procedures to identify and correct health and safety hazards in the workplace, provide effective training to all employees so they can perform their job safely and more.

Cal/OSHA 30-Hour General Industry Training Requirement

In accordance with the California Business and Professions Code, section 26051.5, employers with two or more employees must ensure one supervisor and one employee have successfully completed a Cal/OSHA 30-hour general

industry outreach training course offered by a training provider that is authorized by an OSHA Training Institute (OTI) Education Center.

ODOR CONTROL PLAN

As cannabis is legalized across the country, significant research is being undertaken to better understand odor intensity at each point in the cannabis supply chain. These findings are integral to ensuring air quality management best practices are in place specific to each use type.

One example of the research driving the development of best practices can be seen in the City of Denver's Public Health and Environment Guide to reducing the impact of cannabis operations on air quality. Per this Guide, odor generation is typically associated with the cultivation and manufacturing of cannabis, as both processes are odor intensive, and not with retail operations given all products arrive in their final form.

California law requires that all products arrive at a retail establishment fully processed, tested, packaged, and sealed in child resistant packaging. Because all products arrive at Embarc retail stores in their final packaged form, there are virtually no odors associated with this license type. Specifically, per State law, all packaging will protect the product from contamination; be tamper evident and sealed so the contents cannot be opened without destruction of the seal; and be child resistant as stipulated by the California Department of Public Health Code (40415).

Our proposed dispensary will receive, store, and sell packaged products in their final form. Consequently, it is highly improbable that any on-site product will emit a strong odor. Nevertheless, this section contains an overview of Embarc's comprehensive Odor Management Plan designed to ensure odors are undetectable.

Embarc is committed to mitigating any odors associated with our facility and will be responsive to the odor control requirements set forth in the applicable state and local regulations. Embarc's odor mitigation practices are intended to serve the following purposes:

- To ensure that air circulation resulting from Embarc retail operations does not impact our employees' health and welfare;
- To ensure that air circulation resulting from Embarc retail operations does not impact surrounding businesses and outdoor areas; and
- To ensure thoughtful operations that demonstrate a true commitment to the health and welfare of the City and its residents.

Embarc San Luis Obispo will employ industry-leading best practices to ensure regulatory compliance and nuisance mitigation regarding potential odor through a combination of high-tech air scrubbing and carbon filtration systems, negative air pressure, and other odor mitigating techniques to ensure cannabis odors are not detectable off-site. Appropriate air purification systems and air scrubbers will be utilized to prevent the odor of cannabis from emanating beyond the walls of the premises. Embarc's odor management plan contemplates the following critical components:

PHYSICAL INFRASTRUCTURE: Embarc's approach to retail design contemplates the importance of physical infrastructure necessary to mitigate odors, including those outlined above. It also includes a multi-room entrance area prior to accessing the Retail Sales Area to ensure no odor associated with displays are detectable beyond our doors.

BEST PRACTICES: Embarc will employ industry-leading best practices to prevent odors from being generated and/or detected inside or outside the facility. Embarc will provide a sufficient odor absorbing ventilation and exhaust system so that odor generated inside the business that is distinctive to its operation is not detected anywhere outside of the facility and will utilize carbon and charcoal filtration as appropriate to cleanse the air.

COMMUNITY ENGAGEMENT & RESPONSIVENESS: In addition to physical infrastructure designed to mitigate odors, an important component of our odor control plan is community engagement and responsiveness. While our facility is designed to eliminate odors, we recognize that any new cannabis use, even if that use is not odor-generating, can result in questions and concerns from community leaders, residents, and businesses. Thus, a critical component of our

Odor Management Plan is a robust community responsiveness protocol designed to be proactive in addressing community questions and diligent in responding to concerns.

INTERNAL PROCESS OWNERSHIP: Embarc's retail management structure ensures that there is at least one manager on-site during working hours. All managers and staff are trained extensively on standard operating procedures, including the odor management protocols outlined in this proposal. Managers are responsible for ensuring any odor issues are resolved promptly and that the resolution is communicated effectively both internally and externally.

Many of Embarc's odor mitigation practices overlap with its hygiene protocols. Embarc will train all employees to maintain a sanitary facility reinforced by anti-contamination standard operating procedures. Per regulations, Embarc prohibits any employee or patron from consuming cannabis within or outside our licensed facility. To further minimize or eliminate odors emitted to the surrounding community, no cannabis will be stored or displayed in an area accessible to the general public or stored overnight outside of the building.

Through our leadership team's years of operating cannabis facilities and the lessons learned at our operational locations, we have developed protocols and procedures to mitigate and eliminate any potentially offensive odors that could be detectable by the surrounding community. Thus, our administrative controls have been field-tested and proven effective. They have been designed to ensure that no odors will be detectable outside of our facility.

The General Manager will ensure all odor-producing activities are isolated and mitigated and will perform routine audits to ensure that odor mitigation equipment, filters, and ventilation are working effectively and in good order.

Each employee will be trained to ensure that all doors remain closed and odor-emitting activities are isolated. If an employee notices any equipment malfunction, he or she is required to immediately report the situation to the General Manager, who will develop a plan of action to repair or replace the equipment.

Odor mitigation practices are only as good as their implementation. As a result, Embarc's Odor Management Plan seeks to be all-encompassing, focused not only on the mitigation of odors but also on the ongoing maintenance of best practices with clearly defined process ownership, community engagement, and communications protocols. It is this level of detail that ensures effective ongoing odor management is achieved.

As a component of our proposed Good Neighbor Policy, Embarc will be responsible for the development, implementation, and maintenance of a localized Odor Management Plan. This includes maintenance of all records relating to odor management, including system installation, maintenance, equipment malfunctions, and deviations from the plan.

The General Manager will verify the effectiveness of the air quality management system weekly by physically inspecting the system by listening for the sound of the system, visually ensuring the lights are on and the system is functioning and verifying there is no odor. The General Manager will log that the system has been checked weekly in an odor control maintenance log.

If Embarc receives an odor complaint, the General Manager will:

1. Log the date, time, source, contact information and description of the complaint.
2. Within 30 minutes, the General Manager will identify the source of the odor by physically inspecting the facility for any unpackaged cannabis product that may be emitting odor. This includes inspection of all areas of the retail premises including secure storage area and retail floor, or any other areas where cannabis products are featured or stored.
3. Upon identification of the source of odor, the General Manager will dispose of the cannabis product in a secure and air-tight waste disposal area and log the disposal in the track and trace system as well as the odor control log.
4. The General Manager will also physically inspect the odor control system, within 30 minutes of receiving an odor complaint, to ensure it is functioning properly.

5. If the General Manager identifies that the odor control system is malfunctioning, the General Manager will immediately contact the manufacturer.

The General Manager will determine if the issue can be addressed with the manufacturer over the telephone and, if not, will schedule the first available appointment with the manufacturer to visit the retail facility to physically inspect the odor control system. If the odor control system cannot be fixed, the General Manager will immediately place an order for the first available replacement part or new system.

The General Manager will immediately communicate the complaint and resolution to Embarc's executive management team via email within 2 hours. The General Manager will discuss the source of the odor complaint or issue and its resolution with the retail team at the next team meeting to develop and implement procedures to avoid a future odor complaint.

WATER EFFICIENCY PLAN

Embarc, as a responsible business operator, fully understands and appreciates the importance of efficient water usage, particularly in regions such as ours, where water is a precious resource. We are committed to ensuring that our proposed retail storefront maintains a minimal impact on the local water supply.

Our proposed operation, which primarily involves the retail sale of cannabis products, inherently demands significantly less water compared to many other commercial entities, including other commercial cannabis businesses, such as testing laboratories, cultivation facilities, and manufacturers. Water usage in our retail store will be limited to basic needs, such as sanitation purposes (handwashing), restroom facilities (toilet flushing), and drinking water—all of which represent minimal demand.

We have taken diligent steps to ensure the adequacy of the water supply for our intended use. The property owner and Embarc San Luis Obispo Local Owner, Bill Isaman, has confirmed the current water supply's capacity and reliability to support our low-impact operations. This affirmation corroborates our understanding and commitment to an efficient water use strategy.

Moreover, we also plan to employ water conservation practices within our storefront, such as utilizing low-flow fixtures and encouraging responsible water use among our staff. We will regularly monitor our water usage to ensure that we continue to minimize our impact on the local water supply.

RECYCLING OF WASTE WATER

Embarc's proposed retail storefront will not generate significant wastewater, nor will it involve any water-intensive processes typically associated with wastewater production and recycling.

PLAN TO REDUCE WATER WASTE

Embarc is committed to minimizing our water footprint by incorporating sustainable practices and advocating for responsible water usage among our staff. Our plan for water waste reduction comprises these measures:

ROUTINE MONITORING: We will implement regular checks to monitor our water usage, ensuring it remains at minimal levels and promptly addressing any unexpected spikes which may indicate leaks or overuse.

WATER-EFFICIENT INSTALLATIONS: We will utilize water-efficient equipment, including low-flow toilets and faucet restrictors, to reduce our water consumption. Our choice of hardware and installations prioritizes water and energy efficiency.

REGULAR PROPERTY MAINTENANCE: Embarc understands the importance of preventive maintenance to conserve resources. Regular plumbing inspections will be performed to identify and quickly address any issues, thus preventing leaks and unnecessary water wastage.

We view water as a precious resource, and our operations will reflect this. Embarc's approach aligns with the City's sustainable resource management objectives, and we assure you of our diligence in upholding these values in every facet of our operation.

ENERGY EFFICIENCY PLAN

Embarc's deep commitment to sustainability permeates all aspects of our business model. We place paramount importance not just on the wellness of our clients but also on our environmental footprint. Our President of Development, Terri Gilles, a Leadership in Energy and Environmental Design (LEED) accredited professional, ensures our robust sustainability plan, outlining measures to make our operations as energy efficient as possible, is properly executed.

Our pursuit of energy efficiency also extends to lighting solutions. We have planned to utilize energy-efficient light-emitting diodes (LEDs) for our exterior lighting. Interior lighting, other than in the Retail Sales Area, will operate on occupancy sensors to conserve energy when the building is not occupied.

Energy Star certified appliances will be used across our premises to optimize energy consumption. This includes equipment in the Staff Breakroom and the Product Storage Room. As previously discussed, we also plan to use energy-conserving equipment such as low-flow toilets and faucet restrictors in our plumbing systems.

For the building itself, we have taken the decision to use sustainable building materials. Companies like Blue Planet, which produces carbon neutral concrete products, are on our radar for construction material sourcing. Sustainable wood from responsible tree farms, low VOC architectural paints, and cool roof materials for infrastructure replacement all form part of our sustainable design vision.

Our business also considers transportation as a significant area of focus. Encouraging alternate modes of transport, providing bicycle racks, and incentivizing public transportation are part of our commitment to reducing the carbon footprint of our operations. Additionally, our plan includes using vehicles with reduced emissions for delivery purposes.

With this comprehensive plan, we believe we've identified the most reliable and efficient ways to conduct our business while minimizing our environmental impact. Our methods combine energy efficiency, renewable energy use, waste reduction, and resource conservation, forming a holistic approach toward sustainable operations.

ENERGY EFFICIENT LIGHTING

At Embarc, we recognize that energy-efficient lighting is one of the simplest and most effective ways to reduce our carbon footprint. With this in mind, we have committed to the use of energy-efficient LEDs for our exterior lighting, ensuring energy conservation and reducing greenhouse gas emissions. Additionally, our interior lighting systems (excluding the Retail Sales Area) will operate on occupancy sensors, automatically switching off when the building is unoccupied. This approach ensures optimal energy use without compromising on safety or functionality.

CANNABIS WASTE MANAGEMENT:

Embarc's commitment to sustainable waste management is reinforced by our partnership with Gaiaca, a licensed cannabis waste hauler. Gaiaca is recognized both as a Green Business and Small Business Enterprise (SBE) and is the first fully licensed cannabis waste management company in the nation. Their mission aligns seamlessly with our ethos, providing a compliant and sustainable solution for handling regulated cannabis waste. Gaiaca is dedicated to diverting waste from landfills by implementing innovative methods such as composting, recycling, fuel blending, and waste-to-energy efforts.

RECYCLING & COMPOSTING:

Embarc is committed to sustainable waste management practices, which includes composting and recycling programs. We will have waste receptacles with three compartments for landfill, recycling, and composting in both public and employee areas, with clear signage to educate individuals on proper disposal. The compost compartment will be

reserved for food scraps, food-soiled paper, yard trimmings, and BPI-certified compostable products. We will use BPI-certified compostable products whenever possible. Single-use plastics and styrofoam will not be provided in the employee breakroom. Embarc also encourages vendors to reduce the use of styrofoam and/or plastics and increase composting of materials. We are also working with our distributors to identify vendors with sustainable packaging and will use our purchasing power to encourage sustainable packaging among our vendors.

Display & Visibility

No cannabis products or cannabis accessories will be displayed in windows or be visible from the public right-of-way or from places accessible to the general public. Cannabis and cannabis products will only be stored in the Secure Storage room and the Staff Sales Area. The bulk of inventory will be stored in the Secure Storage room, which will not have any windows. Enough inventory to meet the average daily demand will be stored in the Staff Sales Area. Windows in this area are not located close to the point-of-sale counters where products will be stored. Additionally, these windows will be [tinted/frosted] to obscure the visibility of the cannabis products from the general public outside of the building while still allowing some natural light into the space.