

SO CO GROW SECURITY PLAN
1626 Piner Rd.
Santa Rosa Ca 95403

Purpose

This Security plan constitutes the "Standard Operating Procedures" relating to physical and procedural security for SO CO Grow LLC. It contains a comprehensive overview of the company's security program, and in some sections, refers to other relevant plans and procedures. All company personnel shall be familiar with the information and procedures associated with this Security Plan. No persons under the age of twenty-one will be permitted on the premises.

Distribution: A copy of this plan shall reside in each of the following locations:

1. The Main Office/Conference room;
2. Employee Break Room.

Physical Security Layout

See attached security map which shows the physical security layout that protects SO CO Grow, LLC. The operation shall take place entirely within the locked building shown below. The structure shall be fully secured with commercial grade door and window locks. Security cameras shall be placed as shown on security floor plan; footage shall be retained for at least 60 days.

Security Systems

Exterior Lighting

Exterior lighting has been strategically placed on-site to emphasize and highlight entry points into buildings, and areas of interest. Careful attention will be taken to cast the light downward to avoid spilling over onto other properties or the night sky. Lighting will be activated by motion detection and serves as a deterrent to unlawful activities. All exterior lighting shall be Building Code compliant and comply with Section 20-30.080 (Outdoor Lighting).

Cameras

SO CO Grow, LLC deploys motion-sensor surveillance cameras around and inside the existing building. These cameras have strategically been placed to provide maximum coverage of all operations. Staff members have the ability to monitor and control all cameras. In addition, our staff shares monitoring of these cameras with Management and the Cultivation staff. This closed-circuit camera surveillance system can be monitored 24/7 through split screen monitors on-site and by remote access connections.

The camera surveillance camera, controls and monitoring provide enhanced security and safety at the facility, operational viewing of projects underway, safety alerts for response to a major event, and emergency responders with video coverage of critical incidents.

It is the policy of SO CO Grow, LLC to utilize the camera surveillance system for security, safety operational and/or emergency responses.

SO CO GROW, LLC does not use the camera surveillance system for monitoring or assessing employee productivity and/or monitoring, without cause, the legitimate behavior or personal conduct of an individual or group of individuals.

Surveillance Video

Surveillance video will be maintained for a minimum of 60 days. SO CO Grow, LLC uses a standard industry format that will support criminal investigations.

Alarm System

Intrusion alarms are inside the building and located in the main hallway. The alarms serve two important functions:

Provide 24/7 monitoring in remote locations where staff is not always present. [L] [SEP]

Installed in all potential intrusion designated spaces. The alarm sensors include door/window contacts, motion detection, and glass break. These intrusion alarm systems are monitored on-site and remotely 24/7.

Weapons: Employees and visitors at the SO CO Grow, LLC site are not permitted to be in possession of any weapons and/or firearms, with the exception of law enforcement officials.

Compliance with Fire Safe Standards: SO CO Grow, LLC has provided an approved lock-box system at the structure's point of entry. In addition, our company has developed a policy to work with the Fire Department and remain in compliance with their regulations. Additional information is contained in the SO CO Grow, LLC Standard Operating Procedures for Fire Prevention.

Compliance with Fire Safe Standards

SO CO Grow LLC has provided an approved lock-box system at the structure's point of entry. In addition, our company has developed a policy to work with the Fire Department and remain in compliance with their regulations. Additional information is contained in the UMMA2 LLC Standard Operating Procedures for Fire Prevention. Security measures shall be designed to ensure emergency access is in compliance with the California Fire Code and Santa Rosa Fire Department standards. Evacuation route maps will be provided in interior rooms

Law Enforcement Support

SO CO Grow, LLC staff have developed a policy to work in partnership with both local law enforcement agencies – the Sonoma County Sheriff's Department and the City of Santa Rosa Police Department. These agencies support the company's security mission through collaborative training & exercises, observation patrols, response to incidents, and proactive meetings.

Emergency and Non-Emergency Contact Information

In case of emergency or to report a crime or major incident, SO CO Grow, LLC will contact the following appropriate public safety services. *Only call 911 for a serious medical emergency or any type of fire; to report a crime in-progress, or any life-threatening situation.*

1. City of Santa Rosa Police Department

- I. Police Emergency – Call 911 to report a police emergency
- II. Non-Emergency – Call Dispatch at (707) 543-3550 to reach the Santa Rosa Police Department

1. City of Santa Rosa Fire Department

- I. Fire Emergency- Call 911 or (707) 576-1365 from a Cell Phone to reach the Santa Rosa Fire Department
- II. Non-Emergency - Call Dispatch at (707) 543-3500 to reach the Santa Rosa Fire Department

1. Sonoma County Sheriff's Department

- I. Emergency - Call 911 or (707) 565-2121 only when calling from a cell phone
- II. Non-Emergency – Call Dispatch at (707) 565-2121

1. Sonoma County Fire and Emergency Services

- I. Non-Emergency – Call (707) 565-1152

Maintenance & Testing

The facilities security systems and equipment shall be properly maintained and tested in order to ensure its continuous and effective operation.

- Maintenance is performed in accordance with the manufacturer's recommendations and guidance.
- Routine maintenance is performed by employees who possess the necessary levels of mechanical and technical competence.

Issued Keys

Purpose

This policy is to be used as a reference when issuing keys at the SO CO Grow, LLC facility. It will also explain our policy for returning keys, reporting lost or stolen keys, the use of unauthorized duplicate keys and loaned keys. The key system will be documented and maintained by the Key Administrator in the Distribution Department.

Issuing Authority - Keys will be authorized in writing for issuance to employees of the facility by one of the following individuals:

a) General Manager b) Executive Managers or their designees c) Department Directors or their designees.

If keys are requested from one Business Group that would access another Business Group, written approval will be required from Directors of each unit. All approvals will be routed through the Key Administrator. Only in an emergency will a key be issued by an employee without the Key Administrator's prior knowledge, and it will require the approval of Management. When a key is issued under these circumstances, the employee will notify the Key Administrator as soon as possible.

Who Is Authorized To Have Specific Keys

Access will be given only to areas where need can be demonstrated.

Personnel Possession of Issued Keys

Keys will not be loaned and should not be left unattended. All keys issued on a "permanent" basis should be retained in the possession of the person to whom issued. Keys may not be transferred directly from one employee to another. Avoid the practice of leaving keys on desks, counter tops, etc., or loaning to others.

Lost/Stolen Keys

Any person losing a key must report the loss to his or her supervisor immediately, who will then report the loss to the Key Administrator. The Key Administrator along with the employee's supervisor will make a determination as to whether to re-issue the lost or stolen keys.

Duplicated Keys

It is against company policy for employees to duplicate keys without the express permission of the Key Administrator.

Key Check-Out Procedures

To maintain consistency and provide predictability, specific checkout procedures shall be as followed:

Temporary Key Check-out

Temporary key checkout shall be for a period of 24 hours or less. Any authorized individual will be permitted to check out a key on a temporary basis. The Key Administer or his designee shall grant authorization in writing. The individual receiving a temporary key shall provide photo identification at the time of key checkout, upon request. Keys checked out on a temporary basis shall be returned within the 24- hour period. If the individual needs the key for a longer period of time, the key will be checked in and subsequently checked out again.

Temporary Loan Keys

Vendors and contractors may be authorized to have temporary- loan keys. The Key Administrator or his designee may authorize in writing the use of temporary loan keys only through the use of the attached temporary-loan key authorization form. Vendors/Contractors will acknowledge all keys received and report all lost or stolen keys immediately.

Vendor/Contractor will return all keys within two days of termination of work. If keys are not returned within two days of project completion and it is determined a re-core is necessary, it shall be at the vendor/contractor's expense.

Permanent Key Check-out

Permanent keys are issued to employees for the purpose of allowing the employee to access the areas in which they are regularly assigned duties. If keys are requested from one Business Unit that would access another Business Unit, written approval will be required from

Supervisors of each unit. A record of all keys issued will be kept on an employee key authorization form (see attachment) and maintained by the Key Administrator. New employees will be issued keys for their work needs as indicated by the Supervisor on the intent to hire form. Keys shall be issued to new employees by the company's Key Administrator at the time the new employee is issued his or her I.D. badge.

Key Check-In Procedures Key(s) Check-in

When employment with the company has been terminated, all keys will be returned and noted on the employee authorization form by the Key Administrator. Responsibility for collecting the key(s) shall rest with the Supervisor of the terminating employee.

Employee, Contractor and Visitor Identification Badges

Purpose

This policy provides information on the company's Identification Badge Program. The purpose of the program is to enhance the security and safety of SO CO Grow, LLC's employees and customers of the company's physical and financial assets. The company realizes the added burden that increased security measures can place on all employees however, security is of utmost concern. It is our desire to work collaboratively as additional measures are imposed to improve the security program. Each employee/contractor/visitor is responsible for the integrity and safekeeping of his or her badge.

Employee Badges

1. Employees of SO CO Grow, LLC

- a) All employees must wear their approved SO CO Grow, LLC Employee Photo ID Badge when entering the facility at the beginning of their work shift.
- b) The badge must be worn above the waist and be visible at all times to others while in SO CO Grow, LLC buildings and anywhere else while on-site.
- c) While performing work in other areas, employees are required to have their badges readily available. Display practices may be modified by supervisors for special work conditions such as special events.
- d) Only company-approved badge display devices (lapel/pocket clips, armbands and lanyards) will be allowed.

2. Any employee who forgets his/her badge should immediately advise his/her supervisor and contact the nearest General Manager to obtain a replacement Employee Photo ID Badge. If the General Manager does not recognize the employee, or a current picture is unavailable on the badging computer base, the employee's supervisor or supervisor's designee must verify the employee's identification.

3. Any employee who misplaces or loses his/her badge should immediately contact his/her supervisor and the General Manager. After hours, contact your supervisor. A replacement

Employee Photo ID Badge will be issued.

4. Any person, including employees, not wearing a badge at the facility should be questioned by other employees or supervisors to follow the provisions of this policy.
5. When entering any access-controlled area by vehicle, each vehicle and each occupant must stop to display the proper ID Badge.
6. When entering any access-controlled building, employees must not allow entry of another person unless the individual displays a proper ID badge.
7. Non-compliance with this policy or any breach of SO CO Grow LLC's security procedures should be reported immediately to your supervisor.
8. Badges should not be worn off-site unless for official business.
9. All employees serving as Sponsors shall comply with the provisions for contractor and visitor badges.
10. Violation of this policy may lead to disciplinary action, including possible termination.

Contractor Badges

1. A Contractor is a vendor, supplier, professional service representative or consultant ("Contractors") who has business with SO CO Grow LLC.
2. Contractors are required to sign in and receive an identification badge while working at or visiting the facility. Contractors who will be on company's facilities for only one day or less will be provided a Visitor Badge.
3. The General Manager and Supervisors will be trained to issue Visitor Badges to Contractors entering the SO CO Grow, LLC facility.
4. Contractors should be instructed to wear their badges properly while on the facility site. The employee or project manager whom the Contractor wishes to see will become the "Sponsor" of the Contractor.
5. Sponsors will be contacted to escort all Contractors into and from Secured Areas. At the request of a Sponsor, a Contractor who will be on company facilities for more than one day, or who will not be escorted by a Sponsor, will be issued a Contractor Photo ID or Access Badge.
6. Contractors should be instructed to wear their badge while on the facility site. The badges must be returned to the Sponsors or issuing personnel at the end of each project.
7. Sponsors who authorize photo ID badges for Contractors will be required to make arrangements prior to the work-start date. Pertinent information must be given to designated badge providers. Time must be allowed prior to the beginning of a project for photos to be taken and badges to be created for each Contractor representative. In

other words, Sponsors shall contact Contractors to obtain the necessary information, in advance, to the designated badge provider.

8. Contractors who misplace or lose their badges must immediately notify their Sponsor or SO CO Grow, LLC Project Manager. A replacement Contractor Photo ID Badge will be issued.
9. Any Contractor not wearing a badge while on the facility site should be questioned by employees, supervisors, or other authorized personnel to follow the provision of this policy. Questions regarding where to obtain a Photo Contractor ID Badge should be directed to the General Manager.

Visitor Badges

1. A Visitor is any individual who is conducting business with SO CO Grow, LLC (other than a family member or guest) visiting a SO CO Grow, LLC employee.
2. All visitors to SO CO Grow, LLC are required to sign in and receive a visitor's badge.
3. Visitors who will be on the company facility for only one day or less will be provided a dated Visitor Badge. As a courtesy, Sponsors who have visitors arriving for scheduled meetings may provide notice to the designated badge providers in advance.
4. The General Manager and Supervisors will be trained to issue Visitor Badges to Contractors entering the SO CO Grow, LLC facility.
5. Visitors should be instructed to wear their badge properly while in Secured Areas of the facility. The employee or department the visitor wishes to see will become the "Sponsor" of the visitor.
6. Sponsors will be contacted to escort all visitors into and from Secured Areas. If you have questions regarding where to get a Visitor ID Badge, please contact the General Manager or any Supervisor. Visitors who lose their badges must immediately notify their Sponsor or the issuing personnel.
7. No persons under the age of twenty-one will be permitted to enter the premises.

Separation of Employment, Completion/Termination of Contractor Services

Upon separation of employment or completion/termination of Contractor services, SO CO Grow, LLC ID badges must be returned to the supervisor or Sponsor, immediately.

Security Measures

Purpose

This policy addresses the responsibility of all employees to comply with SO CO Grow, LLC security measures. Employees and contractors are prohibited from tampering with or obstructing the view of facility security cameras and/or security-related equipment. This policy also addresses interfering with or disabling any other security-related measures.

The company relies on comprehensive security systems and measures to ensure our employees, contractors and visitors remain safe and our critical assets are protected. Many of

these security measures are required by state law due to the nature of the company's facilities. All employees are expected to know and support the security measures related to their jobs.

Security cameras strategically placed throughout the facility have an integral role in security. Unauthorized interference with these cameras can jeopardize people and facilities. Therefore, no employee shall knowingly tamper with or obstruct the view of any security camera or security-related equipment.

The company has carefully implemented a number of other integrated security measures, including but not limited to: restricted access, intrusion alarms, locked doors/gates/windows, fencing, and signage. No employee shall knowingly disable, circumvent, bypass or compromise any of the company's security measures.

Any employee having knowledge of any tampering with, circumvention of or breach of security or security measures shall notify their supervisor immediately.

Investigations of alleged violations of this policy will be conducted under the direction of the General Manager. If the General Manager is unavailable, then the Chief Compliance Officer will assume such responsibility. At the conclusion of the investigation, any employees found to be in violation of this policy will be subject to disciplinary action, up to and including termination of employment.