



CALIFORNIA RETAILER NON-STOREFRONT

**INVENTORY CONTROL, NON-LABORATORY QUALITY CONTROL, TRANSPORTATION, DELIVERY
AND SECURITY PLANS**

Developed in Alignment with California Regulations (2020)

Title 16 of the California Code of Regulations, Bureau of Cannabis Control, Division 42 Chapters 1 - 8



CALIFORNIA RETAILER NON-STOREFRONT INVENTORY CONTROL PLAN

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Section Six

Describe the process for receiving new inventory of cannabis goods.

Subsection 6A: Describe where the cannabis goods are received.

Subsection 6B: Identify who will receive the cannabis goods, such as a manager or an employee.

Subsection 6C: Describe how the cannabis goods are moved to the cannabis storage area.

Subsection 6D: Describe what records are produced.

Section Six

DISTRIBUTION SHIPMENT AND IDENTIFICATION VERIFICATION

[dba name] will receive shipments of cannabis goods, herein to be known as “[New Cannabis Product Shipment(s)]” from licensed cannabis distributors, and deliver the cannabis goods to California purchasers.

When the [Third Party Distribution's Secure Transportation Drivers] (herein the Distributor) arrive at the licensed [dba name] delivery facility carrying a [New Cannabis Product Shipment(s)], [dba name]’s operations team will adhere to a set of procedures to verify the Distributor’s identification before unloading and inspecting the shipment. Upon arriving at the licensed facility, the Distributor will gain access to the facility with his or her unique employee badge or number and government-issued license. The [supervisory role title] will meet the [dba name] Distributor at the entrance of the [Secure Receiving Area] to verify the Distributor’s identification. The [supervisory role title] will inspect the Distributor’s government-issued identification (ID) and employee badge. This verification process will be completed before allowing the Distributor and shipment to physically enter the facility. After verifying the identity of the Distributor, the [supervisory role title] will ensure that the surrounding area is secure before opening the vehicle’s cannabis storage area.

NEW CANNABIS PRODUCT SHIPMENT INSPECTION

After the Distributor’s identity is verified and the vehicle’s cannabis storage area can be safely accessed, a [dba name] [supervisory role title] will ensure that the overall [New Cannabis Product Shipment] is consistent with the shipping manifest and arrived in good condition, pursuant to 16 CCR §5314(c). The [supervisory role title] will first inspect the inbound packages for signs of deterioration or damage that may have occurred during the transport, then he or she will conduct a secondary shipping manifest cross-check to confirm the [Secure Transport Driver’s] verification that all boxes of cannabis goods were accurately reflected in the shipping manifest.

When preparing for incoming and outgoing transports, the Distributor will create and send a shipping manifest for [dba name] to assess, generated through the track and trace system. This shipping manifest indicates the details of a cannabis inventory transfer between licensees and includes the following, pursuant to 16 CCR §5314:

- Name, license number, and premises address of the originating licensee, transporting licensee, and receiving licensee;
- Date and time of departure from the licensed premises and approximate date and time of departure from each subsequent licensed premises, if any;
- Date and estimated time of arrival at each licensed premises;
- Route(s) to be travelled and any planned stops;
- UID, amount by weight or count, name, and type of any cannabis goods included in the transfer;

- Driver's license number, name, and employee identifier of the personnel transporting the cannabis goods; and
- Make, model, and license plate number of the vehicle used for transport.

After ensuring that all **[New Cannabis Product Shipment(s)]** received are as described in the shipping manifest and recorded in the track and trace system, pursuant to 16 CCR §5049, the **[New Cannabis Product Shipment(s)]** will be inspected and accepted into inventory. Two copies of the shipping manifest will be signed and dated by the Distributor and **[dba name]** employee, indicating that **[dba name]** has taken custody of the inventory. This acknowledgement moves the cannabis through a chain of custody, allowing for inventory control between the originating entity and the receiving licensee.

Once signed, the shipping manifest will then remain at the delivery facility and the second signed manifest will be returned to the originating distribution facility. The copy of the manifest will be maintained by **[dba name]**, in accordance with *BPC* §26070(g), and made available to the Bureau and any law enforcement officers, upon request.

If there are any discrepancies between the type or quantity of cannabis goods specified in the shipping manifest, and the type or quantity received or leaving the premises, the **[dba name]** will address, record, and document the discrepancy in the track and trace system **[and in the relevant business records listed below]**. Any discrepancies in the originating shipping manifest will be noted accordingly in writing on the manifest, signed by a manager, photo-copied and stored in the designated record storage area. Received inventory that contains a discrepancy may be grounds for rejection and return of the **[New Cannabis Product Shipment]** to the originating licensee.

When inspecting the inbound packages, **[supervisory role title]** will compare the shipping manifest to the packages and will verify the following information within the track and trace system:

SHIPPING MANIFEST VERIFICATION CHECKLIST	
Name and address of the originating licensee that sent the shipment.	
Name and identifier of the transport agent accompanying the product during delivery and attending the inspection.	
Date and time of the delivery.	
Verification of the shipping manifest number.	
Individual package's strain or product name and batch identifier.	
Each package weight, verified during inspection, or number of units within a package.	
Acknowledgement of the price paid per package received.	

INITIAL QUALITY CONTROL INSPECTION

If the shipping containers and shipping manifest meet regulatory requirements, the employee performing the inspection will open the transport containers and conduct a manual inventory to ensure that the product units within the **[New Cannabis Product Shipment(s)]** match the specifications of the transportation documentation and are consistent with all regulatory compliance requirements. The employee responsible for inspecting and accepting the **[New**

Cannabis Product Shipment(s)] will use the following procedures to ensure product quality and regulatory compliance:

- Verify that the packages are sealed, tamper-evident and in alignment with all relevant packaging regulations including but not limited to: Business and Professions Code Section 26120, CCR, Title 3, Division 8 and Title 17, Division 1, Chapter 13. If packaging reflects tampering, or does not meet the containment qualifications, the delivery may be rejected.
- Product labels will be verified ensuring that all required information has been included. If the product label information does not match that of the transportation documentation, or lacks a required label, the discrepancy will be marked on the documentation and a member of management will be contacted to adjust or reject the transfer.
- The inspecting employee will check that the product looks and smells fresh, indicating proper storage. [dba name] will not accept expired, damaged, deteriorated, misbranded, or adulterated cannabis material. If any deviations from quality standards are found, a member of management will be contacted to adjust or reject the transfer.
- Once all product is verified for quality and compliance, the weight or units of the [New Cannabis Product Shipment] will be verified for accuracy with the documentation.

Upon completion of the initial intake inspection, if the [supervisory role title] finds the [New Cannabis Product Shipment] suitable for retail delivery sale, he or she will acknowledge receipt, or take physical possession of the product within the track and trace system.

A: Describe where the cannabis goods are received.

[CUSTOMIZE THE FOLLOWING SUBSECTION TO FACILITY PER AREA]

SECURE RECEIVING AREA

The [Secure Receiving Area] will feature a [two-bay] door designed for transportation and delivery vehicles to safely enter a loading and unloading area to ensure security during those events. The [Secure Receiving/Distribution Area] will be physically separated from the [Limited-Access Cannabis Storage Area(s)]. Incoming cannabis goods will be received, inspected and sorted in the [Secure Receiving Area], but never stored for an extended period. [Client to add specs for size of Secure Receiving Area plus any other details.]

Two inspections will be performed in the [Secure Receiving Area]: 1) the Initial Quality Control inspection will be conducted to review packaging compliance and shipping manifest verification; and 2) the Retail Sale Verification inspection will be conducted to review labeling and testing information associated with the package. For this purpose, the [Secure Receiving Area] will be

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CALIFORNIA RETAILER NON-STOREFRONT NON-LABORATORY QUALITY CONTROL PLAN

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Section Three

Describe the applicant's procedures for handling returns.

Section Three

In accordance with 16 CCR §5410, [dba Name] prepared the following procedure description for handling returns to demonstrate the company's dedication to trust and reliability at every point of traceability. Customer returns are defined as a customer's return of cannabis goods that were purchased from the licensed retailer and returned back to the same licensed retailer the cannabis goods were purchased from. [dba Name] will accept returns of cannabis goods that meet minimum qualifying conditions for the return. No returned cannabis products will be resold at any time including cannabis goods that are abandoned at the premises, which will be assumed to be a customer return. Defective manufactured cannabis products returned by customers may be destroyed in accordance with 16 CCR §5054 or returned to the originating distributor in accordance with 16 CCR §5053. Return procedures are as follows:

- If a purchaser inquires about a defective product, the [Supervising Manager] will speak with them to confirm a return and replacement of the product, of equal or lesser value.
- The Delivery Driver will collect the return from the purchaser, exchanging the product with the new product, accompanied by a new delivery request receipt that must be signed by the purchaser, acknowledging the acceptance of the new product and the relinquished returned product.
- Returned products collected during the day will be stored within the vehicle in a locked container with the accompanying purchaser's delivery request receipt, separated from any cannabis goods that may still be in the vehicle.
- Ten minutes prior to arriving at the delivery facility, the [Delivery Driver] will contact the [Role Title] using a hands-free cell phone to prepare the facility to secure the [Secure Receiving Area] for the vehicle.
- The vehicle will pull into the facility premises and the [Role Title] will begin unloading the rejected inventory. This inventory will be moved into the [Quarantine Area] until it is evaluated by a member of [dba name] operations team.
- Products that have proven defective will either be returned to the originating distributor or destroyed and recorded in METRC.

[dba name] developed a Recall Plan to handle adverse events including suspected contamination or expiration of cannabis, non-compliant packaging or labeling, or a Bureau-dictated recall. The Recall Process is as follows:

- **Notification — Bureau and Originating License:** When the Recall Plan is initiated, the [Role Title] will first verify the recall with the Bureau by phone within 24 hours. The [Role Title] will also verify with the Bureau by email to ensure that the verification of the recall is received by a Bureau representative and to facilitate a record of the notification. After the Bureau corresponds with [dba name], the originating licensee, either a cultivator or manufacturer, will be notified.
- **Identification of Affected Product:** The Recall Team, made up of the [Role Title(s)], will then begin identifying the location of all cannabis involved in the recall, through the use of their traceable identifiers established in METRC™. METRC™ will be utilized to determine the location of any affected product that still remains in the facility or out for delivery for immediate quarantine. Any pending deliveries of affected products will be canceled and the recipients will be offered an alternative product. The Recall Team will

create a list of all affected product including: product identity (description of the product being recalled); batch number; quantity; reason for the recall (nature of defect); level of delivery; recall classification; the contact at the Bureau to whom details of the recall are relayed; list of customers to be contacted; and applicable production and delivery records.

- **Notification — Entities:** Once the list of affected purchasers is developed, members of the Recall Team will contact each purchaser to inform them about the recall circumstances, and to relay directions on how to return or destroy the recalled product. Telephone notifications will also be communicated by email, if the email is available, to ensure that those impacted by the recall have clear instructions and that there is a record of the communication. A member of the Recall Team will draft a *Notice of Recall* to affected purchasers via a written notification and a phone call, if necessary. The notice of recall will describe the product dispensed, advise purchasers to immediately stop purchase of the product, and coordinate with them to return the recalled product to the delivery facility. If additional efforts are required to have all the defective products returned they will be implemented promptly and will include all information included in the notice of recall.
- **Retrieval:** All products identified for recall will be quarantined immediately in the [Quarantined Cannabis Area] and labeled with a red “QUARANTINE” label, and other documentation that displays product information and amount. Product will be stored carefully, away from other products for retail-delivery sale to prevent cross-contamination and will be locked in the [Quarantined Cannabis Area] for a minimum of 72 hours.
- **Return to Manufacturer for Remediation:** [dba name] will contact the originating distributor to verify if the product is approved for remediation and organize the affected products and return to the distributor. Batches to be recalled and remediated will be returned to the manufacturer. All batches to be recalled without remediation will be either sent back with the distributor for further instruction or identified as “Condemned for Destruction,” physically placed within the [Quarantine Area], and placed in a container labeled “QUARANTINE,” which will be separated from other inventory and secured in a limited-access area that is under video camera surveillance.
- **Destruction:** [dba name] will not destroy recalled product until given authorization by the Bureau, acknowledging that the Bureau may require additional testing of the product before it is formally destroyed. Upon receiving approval to destroy the recalled product, the [Role Title] will record the name and quantity of product involved and will destroy the product in accordance with 16 CCR §5054, or have the product destroyed by the originating distributor. [dba name] will weigh, record, and render cannabis products unusable and unrecognizable prior to disposal. [dba name] will use METRC™ and on-site documentation to ensure that all cannabis products that have been identified for recall have been confirmed, weighed, and tracked while on the licensed premises. Documentation of disposal will also be required.
- **Responding to Complaints:** The [Role Title] will assess and respond to complaints and will follow Bureau instructions pertaining to destruction of recalled product. Mock recall scenarios will be conducted to ensure that the Product Recall Procedure is effective, cohesive, and that all employees are trained on the protocols necessary for completing a successful recall response.

- **Recall Records:** [dba name] will document all complaints triggering or related to the recall. All notifications and communications to the public, licensees, customers, the Bureau, and internal employees will be stored both physically and digitally to demonstrate [dba name]'s efforts to notify and communicate effectively with those impacted by the events of the recall.
- **Process Review:** Following a recall, the [Role Title] will review the Recall Plan to evaluate the process and determine if any areas need improvement. The [Role Title] will consider the time needed to retrieve all impacted products, the ease of identifying impacted products, [dba name] notification actions, and the reason the recall occurred. Should improvements be identified, the [Role Title] will make changes to the written Recall Plan and will conduct any necessary training for [dba name] employees. The [Role Title] will also request feedback from impacted purchasers and vendors to identify possible areas of improvement and to assess the overall effectiveness of the recall.



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CALIFORNIA RETAILER NON-STOREFRONT DELIVERY PLAN

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Section Three

Describe the training provided to delivery employees.

To sustain a compliant and efficient operation as well as a diverse and inclusive environment, [dba Name] will conduct extensive training for each employee to be completed within 60 days of hire. In addition to operational training, [dba Name] will also cover Company diversity goals, diversity skill building, the State and Federal Equal Employment Opportunity policies, employee rights and responsibilities, and [dba Name]'s Zero-Tolerance Policy as it relates to acts of discrimination, harassment, or violence toward any employee. [dba Name] will conduct employee training on specific SOPs and will be completed by the [General Manager] and [Chief Security Officer], or other designated party deemed qualified.

RESPONSIBILITY AND OVERSIGHT

The [Chief Operations Officer and Supervising Managers] will have direct responsibility for and oversight over the employee training program, including all elements related to safe cannabis use. The [Chief Operations Officer and Supervising Managers] will be responsible for coordinating with [dba Name]'s management team to ensure that all training modules are prepared and presented and verify that all compliance requirements are sufficiently addressed. They will also perform a bulk of the training. The management team will teach courses that fall within their respective areas of expertise; for topics that are better presented by an outside expert, the [Chief Operations Officer and Supervising Managers] will arrange for such experts.

CODE OF CONDUCT

[Delivery Drivers] will be expected to follow internal rules defined in the Codes of Conduct section of [dba Name]'s Employee Handbook. Code of Conduct training will focus on each Company policy and the reason it was included in the Employee Handbook. While not exhaustive, Company policies covered during this training will include: 1) Company Harassment Policy; 2) Violence in the Workplace; 3) Smoking in the Workplace; 4) Diversity and Cultural Awareness; and 5) Attendance and Paid Time Off.

OPERATIONAL TRAINING

The entirety of [dba Name]'s day-to-day operations will be documented in a library of SOPs, inclusive of step-by-step procedures, citation of regulations governing that action, and any associated recordkeeping required. It is imperative that [Delivery Drivers] understand the correct way to perform each aspect of their role to ensure a consistent level of quality, compliance, and patient satisfaction. Delivery employees will be trained in the appropriate policies and SOPs upon beginning employment with [dba Name] and will continue to receive training annually throughout their employment. Operational training is composed of but not limited to: 1) Track and Trace Training; 2) Diversion Detection Training; and 3) Record Keeping Training. Descriptions of these trainings can be referenced in **Section Five of Inventory Procedures Form**. Employees will be provided written course materials one week before each training. Written course materials will also be available and accessible by employees on-site at all times and in a digital format.

Part of Operational Training will be learning and abiding by the non-storefront retail SOPs, as they apply to each employee's dedicated role. SOPs were carefully designed by the [Chief Operations Officer and Supervising Managers], stemming from [prior experience]. This training will be jointly facilitated by [Chief Compliance Officer] and will be modified to reflect any change or additions that are made to an SOP. [dba Name]'s [Chief Operations Officer and Supervising Managers]

prepared the following list of SOPs, which were derived from industry best practices, demonstrating [dba Name]'s understanding of the SOP process and the importance of documenting procedures for the purposes of employee training:

[ADD OR REMOVE SOPS AS NECESSARY]

- *Online Ordering*
- *Order Fulfillment*
- *Product Recall*
- *Closing Procedures*
- *Opening Procedures*
- *Vehicle Sanitation and Maintenance*
- *Cash Management*
- *Equipment Maintenance*
- *Employee Health and Hygiene*
- *Receiving Cannabis Inventory*
- *Pest Management*
- *Product Disposal*
- *Power Outage*
- *First Aid, Fire, and Disaster Training*
- *Security Threat*
- *Inventory Reconciliation*
- *End of Day Inventory Audit*
- *Moving Product Into/Out of Secure Storage*
- *Hours of Operations*
- *Outside Signs*
- *Control of Litter, Debris, Trash and Graffiti*
- *Maintain a Clean, Orderly, Sanitary Facility*
- *Appropriate Payment for Cannabis*
- *Determination of Necessary Inventory Additions and Reductions*
- *Product Handling*
- *Verifying Legitimacy of Purchaser Identification*
- *Confidentiality of Information*
- *Limits on Dispensing*
- *Managing Staff Breaks*
- *Maintenance of Employee Records*
- *Notifying Proper Authorities of Changes in Employment Status*
- *Payroll Management*
- *Management of Employee Benefits*
- *Supervision of a Detailed Security Plan*
- *Staff Training on Security Procedures*
- *Use of Alarms and Panic Buttons*
- *Maintenance and Testing of Security and Fire-Safety Systems*
- *Window, Door, and Perimeter Checks*
- *Preventing Loitering, Inside and Out*
- *Good Neighbor Relations*

The [Chief Operations Officer] will be responsible for implementing and periodically re-evaluating the above listed SOPs, and all other company SOPs. [Supervising Managers] are responsible for day-to-day oversight, ensuring that all employees strictly follow SOPs on an operational level, and facilitates related employee training.

JOB-SPECIFIC TRAINING

Job-specific training will be required for all employees, but will be tailored to each individual role and job function. This training will be conducted primarily by the employee's immediate supervisor and the employee's co-workers and will occur during work hours. The training stresses compliant, ethical behavior. Depending on the nature of an employee's position, job-specific training will cover topics such as safety and inventory, order fulfillment, online ordering platform, specific operational workflow, defensive driving and delivery software. Employees will also undergo security drills. As part of job-specific job training, the new employee will be paired with an experienced co-worker and a member of the management team who will guide the new employee through the cannabis business training process. The [General Manager] will be responsible for setting training goals and timelines for each aspect of the employee's job-specific training while the experienced coworker will be responsible for physically completing the training process with the new employee. The members of the training team will work with the new employee for no less than 30 days after the hiring date.

CAL-OSHA TRAINING REQUIREMENT

Pursuant to 16 CCR §5002(c)(35), [dba name] will require at least one supervisor and one other [dba name] employee within 30 days of onboarding to complete a Cal-OSHA 30-hour general industry outreach course offered by a training provider that is authorized by an OSHA Training Institute Education Center to provide the course. [dba Name] will ensure the [Account Manager] or authorized additional employees designated as track and trace system users attend and successfully complete all required track and trace system training, including any orientation and continuing education, in line with 16 CCR §5048(b). This training will be completed prior to the launch of operations or within five days of launch.

EVALUATING TRAINING

Each quarter, [Supervising Managers] will work closely with [Chief Operations Officer] to reassess [dba Name]'s training approach, determine new required staff training, and make updates as procedures or content change such as new product additions, regulatory updates, or recalls. [dba Name] employees will be responsible for adhering to these protocols and will be trained to consistently act in a friendly, caring, and supportive manner while providing purchasers with the delivered orders. Pursuant to 16 CCR §5037(a), all training attendance records including, but not limited to, the names of the attendees and the subjects taught, will be retained for at least seven years and made available for inspection by the Bureau and its authorized agents upon request.



CALIFORNIA RETAILER NON-STOREFRONT SECURITY PLAN

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Section Three

Describe the procedures for allowing individuals access to the premises, which includes:

Subsection 3A: A list of employees who have access including their roles and responsibilities.

Subsection 3B: A description of how the applicant will ensure only authorized persons have access to the licensed premises and its limited access areas.

Subsection 3C: description of how the applicant will maintain an accurate record of all non-employee authorized individuals allowed onsite, in conformance with section 5042 of the Bureau's regulations.

Section Three

A: List of Employees who have access, including their roles and responsibilities

Within 14 calendar days of licensure notification, [dba name] will provide a list of employees who have access to the premises to the Department and the Bureau and will specify the particular areas of access granted to each employee. At this time, employee access permissions cannot be determined with specificity because [dba name] has not fulfilled all roles at the Retailer Non-Storefront facility.

The following known roles will have access permissions to the premises:

[CUSTOMIZE TO THE CLIENT]

The [Role Title EX: Security Director] — The [Role Title EX: Security Director] is responsible for overseeing all alarm and surveillance activity monitoring and maintenance. He/She is responsible for the training of [Security Guards] and for updating the Security Team and authorized management on security protocol. He/She will work in conjunction with the [dba name] management team to enforce security operating procedures.

[LEAVE THE FOLLOWING IF EMPLOYING: Security Guards] — [Security Guards] will be responsible for the monitoring of surveillance equipment, daily check-ups on facility surveillance and alarm equipment, reporting of issues during maintenance check-ups, and providing physical perimeter security along with stationed surveillance monitoring from the Security Area.

The [Role Title EX: Director of Operations] — The [Role Title EX: Director of Operations] will be responsible for overseeing the day-to-day operations and commercial cannabis activities performed by [dba name]. He/She will ensure the operation is operating compliantly, effectively, and safely by implementing standard operating procedures for employees to follow. The [Role Title EX: Direct Supervisor] will assign access permissions, with proper authorization, to ensure authorized employees have access to facility premises and limited-access areas. He/She will also maintain employee scheduling and records for the facility.

The [Role Title EX: Compliance Manager/Supervisor] — The [Role Title EX: Compliance Manager/Supervisor] is responsible for the inventory and recordkeeping processes for [dba name]. He/She will ensure [dba name] is operating compliantly and effectively by implementing an auditing and reconciliation schedule, in accordance with 16 CCR §5051(a). He/She will be responsible for investigating discrepancies related to cannabis product inventory, comparing labeling information on incoming shipments with information recorded in METRC™ generated

shipping manifests, and will dictate which physical records will be destroyed and oversee destruction.

[Delivery Agents] — [Delivery Agents] will report directly to the [Designated Role Title]. [Delivery Agents] are principally responsible for ensuring all cannabis and cannabis products securely arrive to the intended residence, ensuring all cash for shipments are accounted for, verifying the proper order upon delivery, and communicating issues to the [Designated Role Title]. The [Delivery Agents] will adhere to predetermined delivery routes, maintain accurate records of all transports, and document any incidents that may occur during transport such as delivery delays, mechanical issues with transport vehicles, and unanticipated road work, among other scenarios. [Delivery Agents] will be trained to adhere to all company security processes and procedures, and State regulations.

B: Description of how [dba name] will ensure only authorized persons have access to the licensed premises and its limited access areas

[Keep the following sentence if Facility has fencing around the perimeter: The perimeter of the delivery facility will be secured by fencing surrounding the back of the facility premises.]

Signage will be posted on each point of ingress around the perimeter of the premises. Signage will not disclose the activities occurring in the facility and will be at least [12] inches wide and [12] inches long. Signage will include the following statements:

Statement 1:

PERSONS UNDER 21 YEARS OF AGE ARE NOT PERMITTED ACCESS TO THE PREMISES. THESE PREMISES ARE UNDER CONSTANT VIDEO SURVEILLANCE.

Statement 2:

UNAUTHORIZED VISITORS WILL BE ESCORTED OFF THE PREMISES IMMEDIATELY.

When a vehicle is approaching the facility or when an individual is walking up to the primary point of entrance, vehicles and individuals will first be seen **[remove or amend the following if not applicable: on a security monitoring screen located within the [security office]]**. Employees will gain entry to the facility by **[employee verification process - i.e. pin entry, electronic access by card, let in manually, etc]**. Approved visitors and contractors will complete the visitor sign-in process while unapproved visitors will not be permitted to enter the premises. [dba name] will also affix signs surrounding the perimeter notifying individuals that the surrounding areas are being monitored by surveillance cameras.

In accordance with 16 CCR §5046, all internal and external doors and door frames will be commercial-grade, of metal construction, equipped with nonresidential locks, and reinforced for securing points of ingress or egress. Door frames will be securely affixed to the wall of the facility, and doors will be secured with a minimum of **[choose: two or three]** hinge plates, avoiding face-mounted hinges that are accessible from the exterior. Screws will be a minimum of **[X]** inches with the strike plate having a minimum of four offset holes. Doors will be between **[X-X]** mm (millimeters) in thickness for both interior and exterior use. An electronic access control system

will be installed at all exterior doors and several interior doors within the delivery facility to provide strict access control through the use of programmable [key card, fob, fingerprint, pin number].

Limited-access areas will be locked and closed at all times, pursuant to 16 CCR §5042, and an assigned [key card, fob, fingerprint, pin number] will be required when employees enter any area of the facility where a [select: numerical keypad, biometric fingerprint controller, radio frequency identification (RFID) card reader, or describe electronic entry method] is present. Door contact switches will also be equipped at each point of ingress and egress throughout the facility. Should a group of employees need to enter the same area of the facility, each individual must enter secure areas one at a time. The next employee requiring access must wait until the door is securely closed before [scanning/swiping/entering] his/her assigned [key card, fob, fingerprint, pin number]. This process affords the [Security Team] the ability to: 1) know where employees are at within the facility at all times; 2) identify strange or inconsistent employee behaviors or patterns; and 3) review an electronic log of accessed rooms maintained on [dba name]'s control server. During the pre-programming of each employee's [key card, fob, fingerprint, pin number], a photo will be added to ensure visual verification when certain areas are accessed. Doors will be assigned physical keys, maintained by the [Security Director], as a failsafe in the event of a system malfunction, such as a power outage, that may affect the functionality of electronic access mechanisms.

C: Description of how [dba name] will maintain an accurate record of all non-employee authorized individuals allowed onsite, in conformance with section 5042 of the Bureau's regulations.

In accordance with 16 CCR §5043, any person who does not have a valid Company-issued employee identification card is prohibited from accessing the facility unless that person receives authorization and obtains a visitor identification badge. In the event that a non-employee visitor enters the premises, the individual must be formally checked in by a [Security Guard/Receptionist/Other] stationed at the facility's primary entrance [add room name if desired], and obtain a numbered visitor identification badge. Badges will only be issued to individuals who possess a valid, government-issued photo identification (ID) card, and have been approved for visitation. The [Security Guard/Receptionist/Other] will scan the ID into [dba Name] computer system to retain a digital copy. Copies will be saved using the naming convention Date_LastName_FirstName. A copy of the ID will be printed and the [Security Guard/Receptionist/Other] checking in the visitor will add the printed copy to a physical Visitor Log, located at the [Primary Entry] check-in area. The [Security Guard/Receptionist/Other] will





Together we can shape the
cannabis industry for the greater
good. Shoot us an email or give us
a call to start collaborating.

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