



CALIFORNIA DISTRIBUTION SECURITY PLAN

Developed in Alignment with California Regulations (2020)
Title 16 of the California Code of Regulations, Bureau of Cannabis Control, Division 42 Chapters 1 - 8

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: A 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 Distribution facility.

The following known roles will have access permissions:

[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] are 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: Direct Supervisor] — The [Role Title EX: Direct Supervisor] 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 § 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.

[Secure Transport Drivers/Delivery Drivers] — [Secure Transport Drivers/Delivery Drivers] will report directly to the [Designated Role Title]. [Secure Transport Drivers/Delivery Drivers] are principally responsible for ensuring all cannabis and cannabis product securely arrives to the intended licensed receiving facility, ensuring all cash for shipments is accounted for, verifying incoming inventory amounts upon product pick up and communicating issues to the [Designated Role Title]. The [Secure Transport Drivers/Delivery Drivers] 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. [Secure Transport Drivers/Delivery Drivers] 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 Client has fencing around the perimeter: The perimeter of the distribution 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. [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 distribution 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 write down the visitor's full name, date, time of arrival, and the number associated with the Company-issued visitor badge.

Pursuant to 16 CCR §5042(c), a person who obtains a visitor ID badge will be escorted and monitored by an assigned, registered employee of the distribution facility at all times. Approved visitors must display their visitor ID badge in a conspicuous place at all times while on the premises, and must return the visitor ID badge before leaving the premises. Visitors must sign a Visitor Policy Acknowledgment upon arrival to the facility, indicating that the visitor has formally agreed to [dba name]'s Visitor Policy and will: 1) remain with a supervising employee at all times; and 2) refrain from touching products or equipment, unless related to the purpose of the visit. By signing, visitors are also acknowledging that they understand any violation of [dba name]'s Visitor Policy will result in immediate expulsion from the facility.



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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