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Mijosa, L L C

CULTIVATION AND MANUFACTURING  
FACILITY

2459 Radley Court, Hayward, CA

SECURITY PLAN

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## PURPOSE

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Mijosa, LLC.'s (Mijosa) policies established herein are strictly enforced. The safety and security of our staff and surrounding community is our paramount concern. Internal and external security threats to the company exist relating to physical, procedural and cyber security. It is the responsibility of every employee, supervisor and manager to aid in the security of the Mijosa facility through prevention, awareness, reporting, and responsible incident management.

The State of California Code of Regulations, Title 16, Division 42, the Bureau of Cannabis Control (the "Bureau") describes minimum security requirements for cannabis facilities, which are addressed in the Mijosa Security Plan.

Mijosa is committed to providing a safe and secure facility and workplace. Human life, public safety and security are essential components of the services we provide to our customers and the community. A comprehensive security plan has been developed to fulfill this commitment to ensure that access to our facility is safe, secure and limited to employees and visitors approved under City of Hayward Municipal Code Sections 10-1.3600, et. al. and the Bureau's Regulations Sections 5000-5315.

The Mijosa security plan is based upon measures that have been successfully implemented at multiple pharmaceutical facilities operating successfully in the San Francisco Bay Area, California.

The policies and procedures of the Mijosa Security Plan and Critical Security Response Protocol provide the facility with the most comprehensive safety and security possible. It is the responsibility of the Security Manager and General Manager to ensure these protocols are followed and constantly evaluated for effectiveness and revised as necessary.

***The content of this security plan is proprietary to Mijosa, LLC (Mijosa) and Michael Glenn Investigations and may not be used or duplicated without written permission of Mijosa.***

## POLICY AND PROCEDURES OVERVIEW

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Measures to deter and prevent unauthorized entry into areas containing cannabis products and theft of cannabis products at the facility are addressed throughout the plan. Access to the facility is limited to Mijosa management, employees and those persons allowed access by the Bureau, the Department of Public Health, the City of Hayward Municipal Code and California State law.

Mijosa's established security policies and procedures will be strictly enforced. These security measures include:

- Preventing unauthorized/unlawful entry to the Mijosa facility.
- Preventing unauthorized individuals from remaining on the Mijosa property if they are not engaging in activity related to Mijosa operations.
- Establishing limited access areas.
- The storing of all cannabis products in a secured and locked room, safe, or vault bolted to the floor on the property and in a manner as to prevent diversion, theft, and loss.
- The storing of all unusable and excess cannabis in accordance with Mijosa's Waste Disposal Policies & Procedures, until the product is disposed of.

## EMERGENCY CONTACTS

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City of Hayward Police Headquarters – 911 or (510) 293-7000

City of Hayward Fire Department – 911 or (510) 583-4900

Public Works – (510) 583-4000

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

## SECURITY PLAN

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The Mijosa Security Plan details protocols to control the ingress and egress of employees, vendors and visitors, as well as measures to deter trespassing and unauthorized entrance to the facility and perimeter property. Specific security protocols are documented in the Standard Operating Procedures for Security & Safety. In addition, the Critical Security Response Protocol outlines responses in the event of an emergency or critical incident.

## SECURITY STRATEGY

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Mijosa will utilize a 24/7 centrally monitored safety and security system capable of detecting and alerting Mijosa management and emergency responders of fire, burglary and robbery.

Mijosa will install a state-of-the-art surveillance system that electronically monitors and records all interior and exterior areas twenty-four hours a day, seven days per week. The surveillance system will be of appropriate quality, color, rendition and resolution to be capable of identifying any individual on the premises or its adjacent areas. These recordings are maintained for a minimum of ninety (90) days.

Mijosa will contract with a licensed alarm company to provide a comprehensive security, surveillance, smoke, fire and robbery alarm system. The company will be licensed by the State of California, Department of Consumer Affairs Bureau, of Security and Investigative Services (BSIS) in accordance with California Business & Professional Code 7590.

Access to the surveillance system servers will be restricted to the General Manager, Security Manager, and IT Manager. The Bureau, law enforcement and City of Hayward departments will have access to recorded surveillance at all times. Access granted to any other individuals shall be approved and documented by the General Manager and Security Manager.

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## SECURITY STAFF

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Security staff will be provided training specific to the special needs of Mijosa vendors and staff. The security staff person will incorporate high profile deterrence methods along with non-confrontational interactive techniques to deter trespassing, robbery, theft and disturbances.

Facility security will be led by a qualified security manager trained in non-confrontational and de-escalation techniques that utilize verbal communication and limited physical force techniques.

The Security Manager's responsibilities include, but are not limited to:

- Ensuring that a state-of-the-art security alarm system is installed and maintained, incorporating a series of door and window sensors, fixed and wireless panic switches and twenty-four-hour monitoring. This system will be equipped with a failure notification

activation.

- Ensuring a state-of-the-art electronic entry control system, programmed for staff access to authorized areas of the facility. The system ensures electronic access only to authorized personnel to secure areas, while providing digital evidence of access for future review. Immediate deactivation of the system will be completed by management as appropriate.
- Ensuring an array of physical deterrents, such as but not limited to access-controlled doors, walk-in vaults, and interior and exterior security/trespassing signage. Wherever possible ‘Trap door’ systems will be utilized to deter unauthorized entry.
- Ensuring windows and roof hatches are properly secured and equipped with safety latches that may be released quickly from the inside to allow exit in the event of an emergency.
- Ensuring commercial grade exterior lighting is installed and maintained to provide adequate illumination of the facility to ensure proper video surveillance of the property.
- Ensuring that all vegetation, trees and other objects are cleared so as to provide an unobstructed view of the facilities perimeter.
- Ensuring hand-held radios are used to communicate between management, staff, and security personnel.
- Ensuring that the security plan is maintained, reviewed and updated as necessary, particularly after an incident.
- Ensuring that limited access areas are secure and accessible only to authorized personnel.
- Ensuring all cannabis products are stored in a locked display case, cabinet, safe, vault or room within the facility.
- Ensuring all employees are trained in the use of the alarm system, panic buttons, emergency and critical incident response protocols.

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## VIDEO SURVEILLANCE

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Mijosa will utilize a comprehensive, state of the art surveillance system to assist the management and security team in deterring trespassing, theft, and robbery, and enhance personnel safety. Video cameras will be installed throughout interior and exterior of the facility, including all areas that contain cannabis product and proceeds or cultivation and manufacturing activities. Cameras will be positioned to provide high quality images of any person entering or exiting the facility, including the street and surrounding areas.

The facility will conspicuously display security cameras, lights and warning signs. A notification system will alert management of any surveillance failure. All video recordings will be preserved for no less than ninety (90) days and will be made available to the City of Hayward or the Bureau upon request.

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## ALARM SYSTEM

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The Mijosa facility will be monitored after normal business hours by Bay Alarm using a state of the art system, which detects unauthorized entry onto the enclosed exterior or interior of the facility and activates an alarm. In the event of a door, window and roof activation, alarm personnel will monitor real-time video feeds of the facility to determine if an actual threat exists. Should an intruder be observed on the property, the alarm company will immediately notify the Hayward Police Department, Mijosa management and security staff. The system will eliminate false alarm notifications to the Hayward Police Department, thus preventing the unnecessary deployment of valuable police resources and false alarm fines. A notification system will alert management of any alarm failure.

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## VISITORS

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All visitors to the facility will be required to check in with the security staff and the General Manager or his/her designate. Visitors will sign in and provide a valid form of government identification prior to entry. Visitors will be provided a visitor identification badge, to be worn conspicuously on the front of his/her torso. Visitors will be escorted through the facility by a Mijosa employee at all times. Visitors will not be provided access to vaulted areas containing cannabis products or currency.

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## LIGHTING

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Commercial grade lighting will illuminate the exterior of the facility. Any unnecessary vegetation, trees or objects will be removed in order to provide an unobstructed view of the facility by security personnel and video surveillance.

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## SIGNAGE

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The following signs, in measurements of not less than 8 by 10 inches, shall be clearly and legibly posted in a conspicuous location inside the facility stating:

*“Juveniles and persons under the age of 21 are prohibited from entering the facility”*

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## SECURED AREAS

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The front entrance of the facility will have all window upgraded to prevent a forced entry cannot be attempted.

The main entrance to the Mijosa facility will be controlled to allow visitors and employees into the entrance prior to entry into the main facility. Visitors and employees will be screened and issued a visitor pass prior to entry.

Mijosa will install a secure storage of all cannabis and proceeds. The storage will be of commercial design and of recommended industry standards for theft prevention.

The secure storage will be monitored with an interior alarm and live-feed video. The facility manager or his/her designee will have access to the vault/safe and follow strict guidelines for maintaining product security.

All unusable and excess cannabis will be disposed in accordance with Mijosa's Waste Disposal Policies & Procedures.

All electronic surveillance and alarm system hardware will be stored in a secured and monitored room designated solely for this type of equipment. The room will have card key and limited access.

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### CULTIVATION AREAS

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All cultivation areas will remain secured and access will be limited to cultivation employees, supervisors and managers specifically authorized to oversee cultivation activities. All access will be by card key or key fob to ensure electronic, timestamped documentation of persons entering the area. All cultivation areas will be monitored 24-hours a day by video surveillance required by Bureau regulations. All surveillance equipment will be capable of recording in low light and darkness. [REDACTED]

[REDACTED] The surveillance system will use infrared activation to alert the monitoring station of any activity conducted after designated cultivation hours.

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### MANUFACTURING AREAS

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All manufacturing areas will follow CDPH and Bureau specifications. All areas will remain secured and access will be limited to manufacturing employees, supervisors and managers specifically authorized to oversee manufacturing activities. All access will be by card key or key fob to ensure electronic, timestamped documentation of persons entering the area. All cultivation areas will be monitored 24-hours a day by video surveillance required by Bureau regulations. The surveillance system will use infrared activation to alert the monitoring station of any activity conducted after designated cultivation hours.

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### DISTRIBUTION AREAS

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All distribution areas will follow CDPH and Bureau specifications. All areas will remain access will be limited to distribution employees, supervisors and managers specifically authorized to oversee distribution activities. All access will be by card key or key fob to ensure electronic, timestamped documentation of persons entering the area. All distribution areas will be monitored 24-hours a day by video surveillance as required by Bureau regulations. The surveillance system will use infrared activation to alert the monitoring station of any activity conducted after



designated cultivation hours.

## REPORTING

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All Mijosa employees are required to immediately report any of the following incidents to the General Manager, who in-turn will report the incidents to the Bureau and Hayward Police Department, the Security Manager and any other appropriate authority. The Security Manager will initiate an investigation into all incidents and forward a report to the General Manager upon completion. Incidents that require an investigation and/or mandatory reporting to the Bureau and the Hayward Police Department include, but are not limited to:

- Significant discrepancies identified during inventory. (The level of significance shall be determined by the bureau).
- Diversion, theft, loss, or any criminal activity involving the facility, any agent or employee of the facility.
- The loss or unauthorized alteration of records related to cannabis, registered qualifying patients, primary caregivers, or facility employees or agents.
- Any other breach of security.

All documented reports of loss or theft must be reported to the appropriate authority and maintained for at least five (5) years after. The General Manager shall ensure copies are provided to the appropriate authorities upon request.

The reporting of loss or theft is required as follow:

Cultivation: California Department of Food and Agriculture (CDFA) Reg 8409, within 3 Calendar Days.

Manufacturing: California Department of Public Health (CDPH) Reg 40207, within 24 Hours

Distribution: Bureau of Cannabis Control (BCC) Reg 5036 within, 24 Hours

## ANCILLARY ACCESS POINTS

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All roof penetrations will be secured so as to prevent unauthorized entry. The method of securing will comply with all applicable City of Hayward Building and Fire Code provisions. The surveillance and alarm system will monitor the entire roof area, providing alarm activation and a live video feed in the event the roof area is breached.

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## ACCESS CONTROLS AND RESTRICTED AREAS

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Security procedures relating to facility access are as follows:

- Only employees, officials in the course of their duties, and vetted/approved outside vendors, contractors, and visitors will be allowed access to the facility
- Employees must display identification at all times while working in the facility
- Employees must immediately report a lost identification badge to their supervisor. A lost employee identification and or access card will result in immediate deactivation and the issuance of a new card

All doors without electronic access control systems must be re-coded or re-keyed annually and following any voluntary or involuntary termination.

The security surveillance room will be located in the security office, which will remain locked and will not be used for any other function. A current list of authorized employees and service personnel that have access to the surveillance room must be maintained by the General Manager and available to the Bureau upon request.

Facility keys, alarm codes (“AC”), and electronic access control cards (“EACC”) will be issued by the General Manager or his/her designate. It is against Mijosa policy for any employee to duplicate keys without written permission of the General Manager.

The Security Manager will oversee the management of the keying and coding systems of the company. All keys, ACs, and EACCs are recorded and tracked in the Facility Key, Alarm Code, and Electronic Access Control Card Log by the General Manager with the following information:

- |                   |                       |             |
|-------------------|-----------------------|-------------|
| • Employee name   | • Date issued         | • Signature |
| • Employee number | • Term of issuance    |             |
| • Identification  | • Date to be returned |             |

Keys, AC, and EACC must be protected. Keys, AC, and EACC may not be loaned and should not be left unattended. All keys issued on a "permanent" basis should be retained in the possession of the employee to whom issued. Keys, ACs, and EACCs may not be transferred directly from one employee to another. Practice of leaving keys on desks, counter tops, etc., or loaning to others. It is against company policy to duplicate keys.

Access will be given only to areas where need can be demonstrated. Issuance must be recorded by the issuing individual in the Facility Key Fob, Alarm Code, and Electronic Access Control Card Log.

Any employee losing a key, AC, or EACC must report the loss to his or her manager immediately, who will then report the loss to a manager. The manager will make a determination as to whether the system has been compromised and whether to re-key, re-core or re-code.

When employment with the company has been terminated, all keys must be returned by the employee, documented and noted in the General Manager's report. The manager terminating an employee is responsible for collecting all key(s) and EACC(s). Failure on the part of a manager to collect key(s) and EACC(s) from terminating employees may require a key core change. After an employee or contractor is released from employment the General Manager will provide written notice to Mijosa within ten (10) working days.

## CASH HANDLING PROCEDURES

[REDACTED]

[REDACTED]

### **Cash Handling**

- All cash, even small amounts (petty cash) will be secured under lock and key.
- Two vetted employees will be present whenever cash is transported from one location to another within the facility. When cash is removed from the safe, it will be counted by two vetted employees and both will sign the cash count sheet acknowledging that the recorded amount of cash is accurate.
- When cash is handed off to another employee or contractor, the person accepting the cash will count or otherwise verify the count before accepting it and keep a signed copy of the cash record with the cash.
- When cash is returned to the safe, it will be counted, and the cash count sheet will be signed by both parties.
- Bank, vault or secure transport routing documents will match the cash sheets.
- Records will be maintained on all cash handling deposits.

### **Cash Counting**

All cash counting will be conducted in the secure storage room out of public sight. All cash counting will be conducted within view of a designated surveillance camera strategically placed within the storage room.

A cash count sheet will document the following:

- The names of employees removing cash from safe
- The date/time cash is removed from safe
- The date/time cash is returned to safe
- The cash breakdown – coins, bills, checks, credit card slips
- Two signature lines for employee sign outs

### **Employee Background Checks**

Background checks will be conducted on all employees handling cash. The background checks will be conducted by Michael Glenn Investigations and will include verification of an employee's information, references, and a standard credit check.

### **Cash Transportation**

All cash transports will be conducted by Core Security Solutions, Inc. (CSSI). CSSI is a BSIS licensed PPO and BCC licensed Distributor and Distributor-Transporter. CSSI will utilize armed, BSIS licensed security teams and armored vehicles to transport all cash and proceeds.

All secure transport teams will be thoroughly trained and updated as necessary on the Mijosa secure transportation protocols contained within Mijosa's Security Plan and Standard Operating Procedures.

CSSI will maintain independent transportation records in the event the data is needed to resolve any discrepancy.

CSSI will strive to work closely with the Hayward Police Department and local law enforcement to maintain open communication regarding security threats and the reporting of crime.

CSSI management will be available as needed to meet with the Hayward Police Department and local law enforcement for information sharing and training.

## **TRANSPORTATION OF CULTIVATED AND MANUFACTURED CANNABIS**

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All cultivated and manufactured cannabis products will be transported to and from the facility by a distributor properly licensed by the Bureau. Upon arrival the distributor will be vetted by the security staff prior to entry and all distribution documents and manifests will be approved by the General Manager or his/her designate. Should any cannabis or cannabis products require loading or unloading away from designated loading areas, the security team will escort the cannabis or cannabis product to or from the waiting transport vehicle.

## PREVENTION MEASURES

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The most effective way to ensure the safety and security of employees, vendors and visitors is to utilize deterrence and prevention strategies. All employees are required to have a good working knowledge of the security policies and procedures and implement prevention measures into daily activities. These measures include, but are not limited to:

- Only main facility entrances will be used for access to the facility.
- Removable bollards will be placed at the front entrance doorway, all roll up doors to deter a forced entry by a vehicle or heavy equipment.
- Auxiliary doors will only be used in cases of emergency. These doors will not be accessible from the exterior and will have push bars on the interior for emergency exiting.
- Storage rooms will be secured with a lock that can be opened from the inside. If applicable, a hide-a-key will be covertly placed in the storage room so that employees are not locked inside during an Incident.
- Department managers will vary employee lunch and break schedules to ensure maximum coverage.
- Employees should be trained to greet every visitor to a facility immediately and look each visitor directly in the eyes noting any nervousness or strange behavior in the visitor.
- Enclosed/locked areas will be cleaned regularly to remove old fingerprints. Oil or wax-based cleaners must not be used.
- [REDACTED]

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## SUSPICIOUS ACTIVITIES

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Each employee is responsible for reporting suspicious activities and persons to the security staff and General Manager. The security staff will notify law enforcement when a suspicious incident or potential risk is identified. If a suspicious person is observed on or around the facility the security staff will notify law enforcement and the General Manager. Should the person leave before an officer's arrival, the time will be recorded along with a detailed description of the suspect(s), their vehicle(s) and any associates. Video surveillance will be reviewed, downloaded and forwarded along with other information to responding law enforcement as appropriate.

Suspicious activity may involve coworkers, vendors, or unknown persons and include:

- Persons monitoring business operations.
- Persons asking about closing times, volume of business, the amount of money on hand,

etc.

- Persons who appear to loiter in the area checking the business layout and operations.
- Persons who may be waiting for a lull in activity and fewer customers.

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## OPENING AND CLOSING PROCEDURES

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When opening or closing the facility, two employees are required to be present. Security staff will escort employees and oversee the opening and closing of the facility to ensure employee safety. Security staff and employees will inspect the business for forcible entry before entering the business and survey the premises before admitting others.

Security equipment will be inspected after opening and prior to closing to ensure the necessary surveillance of all operating activities. At closing, security and employees will survey the premises for anyone hiding within the business, near the building entrance, in the parking lot or surrounding areas.

During the opening and closing of the facility, security staff will observe and/or escort employees to and from the parking lot and observe them exiting and entering their vehicles.

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## SECURITY TRAINING

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Mijosa success and longevity are directly tied to our overarching goal; to exemplify and maintain a culture of safety and security for the community, our employees and visitors. To assist in accomplishing this, staff trainings, focused on universal and timeless concepts, will be mandatory for all staff. The trainings encourage staff to dialogue on ethics, values, principles and how they relate to ethics, personal and professional integrity. Other concepts include suspension of assumptions, blame vs. accountability, and the power of choice.

Mijosa believes that understanding and accepting personal responsibility will empower staff to do their work with integrity, to think ethically and report internal theft, suspicious incidents and criminal activity without hesitation.

All security team members and employees will receive comprehensive security training in accordance with the Mijosa training plan. The Security Manager is responsible for on-going security training with employees. Prior to commencing the duties, each employee will be trained on the following:

- The proper use of security measures and controls for the prevention of robbery, theft and violence.
- Procedures and instructions for responding to an emergency.

- The immediate reporting of any suspicious activity or security concerns to their supervisor as a condition of employment.

### FIRST-AID TRAINING

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All Mijosa employees and security staff will receive mandatory first-aid training, including certified American Red Cross First-Aid and CPR courses. The training will be conducted by a certified safety training provider. Staff will receive recertification training every two years as mandated by the American Red Cross. The Security Manager will ensure the placement of all First-Aid and CPR equipment within the facility follow industry standards. Safety policies and procedures will outline response protocols in the event of an accident or injury, as well as the protocols for servicing first-aid equipment.

### PUBLIC SAFETY PARTNERSHIPS

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Mijosa will maintain professional partnerships with local law enforcement and emergency response agencies, allowing access to the facility as required by law and Mijosa policy.

Mijosa will install and maintain an electronic access system specifically for the Hayward Police Department, the system, yet to be identified, will allow emergency access to law enforcement during alarms or other extenuating circumstances. The Hayward Police Department will be provided will be a critical information list, updated monthly, that includes emergency contact information, surveillance, alarm and security contractor information and a map of the interior and exterior of the facility.

Video surveillance live-feed access information will be made available to the Hayward Police Department for use in surveilling the interior of the facility in the event of an emergency.

In the case of law enforcement request for a Mijosa representative to respond to the facility, Mijosa will ensure a responsible manager or designated employee will respond within thirty (30) minutes. The Security Manager will maintain a list of non-emergency police department and emergency response agency contacts and ensure it is posted in plain view of staff and updated accordingly. The Security Manager will engage these agencies to foster support of the company's security plan by:

- Seeking collaborative training opportunities and training exercises with emergency response instructors, if possible, to rehearse responses to critical incidents and de-escalation techniques.
- Providing the emergency response community with opportunities to review Mijosa security protocols and equipment for feedback on best security practices and potential collaboration of resources.

