



THE CITY OF NEW YORK MANHATTAN COMMUNITY BOARD 3

59 East 4th Street - New York, NY 10003

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Andrea Gordillo, Board Chair

Susan Stetzer, District Manager

Community Board 3 Cannabis License Application Questionnaire

NOTE: ALL ITEMS MUST BE SUBMITTED FOR APPLICATION TO BE CONSIDERED.

The following items package are due by date listed in your email invitation:

- Questionnaire (below)
- Executed lease for the proposed location
- Community Impact Plan (see page 5)

GENERAL INFORMATION

1. Type of License:

- Adult-Use Retail Dispensary
- Micro-business (with retail)

2. Entity Name: SWK743 Inc.

3. Trade Name ("Doing Business As"): NY Cannabis Co.

LOCATION INFORMATION

4. Address (including the floor location or room number, if applicable):

156 Delancey Street, New York, New York 10002

Cross streets: Suffolk St and Delancey

5. Does the business, or has the business, ever sold cannabis products at this location?

- Yes
- No

6. Are there any buildings with the primary functions of a **church, synagogue, or other places of worship** on the same road and within 200-feet of this location?

- Yes
- No

7. Are there grounds occupied exclusively by a **school** on the same road and within 500-feet of this location?

- Yes
- No

8. Are there any **other retail dispensary or microbusiness retail** locations within 1,000 ft of this location?

- Yes
- No

9. If the establishment is a **transfer or previously licensed premises**, what is the name of the old establishment, and what is its registration or license number?

Name: _____

Registration or License Number: _____

PROPOSED BUSINESS

10. Please provide a brief description of the types of products/services (to be) provided at the physical location, including which products will be sold onsite and which will be available for delivery, if applicable.

The premises will sell all licensed adult-use cannabis product types permitted under New York law,
including flower, pre-rolls, vapes, edibles, beverages, concentrates, tinctures, topicals, and other
OCM-approved products. We will not be offering delivery at this time.

11. What measures will be taken to ensure that customers do not smoke outside in areas that would cause smoke to enter apartments or businesses above and nearby?

Staff will post clear no-smoking signage, verbally remind customers that onsite and nearby public
consumption is prohibited, and monitor the storefront area to discourage loitering or smoking near the
premises. Any customer observed smoking outside will be asked to move away from nearby apartments
and businesses and comply with applicable law.

12. How many **cannabis events** will you be hosting per year? We will not be conducting events at this time.

13. Would you commit to playing music at background levels only?
 Yes
 No
14. Would you be willing to meet with the Lower East Side Employment Network (LESEN) to help identify local residents who meet your criteria for staffing the proposed business?
 Yes
 No
15. What are the total hours you will be open each week? 84
16. What are your proposed hours?
- Sundays: 9 AM - 9 PM
- Mondays: 9 AM - 9 PM
- Tuesdays: 9 AM - 9 PM
- Wednesdays: 9 AM - 9 PM
- Thursdays: 9 AM - 9 PM
- Fridays: 9 AM - 9 PM
- Saturdays: 9 AM - 9 PM

APPLICANT/LICENSEE REPRESENTATIVE INFORMATION

17. Applicant Full Name: Vikesh Sharma
18. Attorney/Representative Full Name: Kenneth Seligson
19. Attorney/Representative Address: 42 Broadway #12-553, New York, NY 10004
20. Attorney/Representative Address Phone Number: 213-293-6692
21. How many cannabis licenses does the applicant currently hold? 2

22. Has the applicant completed any workforce or training programs offered by OCM? If yes, which ones?

No. The applicant has not completed any OCM workforce or training programs at this time.

23. If the applicant has an existing business at this location, have they ever received a **violation at this location**?

- Yes
- No

24. Has the applicant received a **violation for selling unlicensed cannabis** in last 3 years?

- Yes
- No

REQUIRED ATTACHMENT GUIDANCE

Community Impact Plan: Please share your community impact plan, including the applicant's proposed strategy for community engagement, as an attachment. You should address the following points:

- Identify the community or communities and individuals disproportionately impacted that the applicant or licensee plans to benefit
- Include a description of:
 - the benefits that the applicant or licensee will provide to the community or individuals disproportionately impacted, including, but not limited to, workforce opportunities, community resources, education, and other community building programs
 - the scale or size of the disproportionately impacted target beneficiaries; and
 - the plan for implementation, including, but not limited to, actions, activities and engagements that will be performed by the applicant or licensee and frequency of engagement with the community or individuals disproportionately impacted
- Detail a demonstrated need of the proposed benefit to the community and individuals disproportionately impacted, including, but not limited to, economic and social impact
- Include identifiable resources the applicant or licensee will use to execute the community impact plan, including, but not limited to:
 - by written agreement, a demonstrable partnership or relationship with a community-based organization or other association
 - estimated expenses, if any, the applicant or licensee will incur to execute the community impact plan and its activities
 - the applicant's or licensee's demonstrated ability, knowledge, expertise or experience
 - any other information or documentation evidencing community engagement.
- Include a description of the applicant's or licensee's strategy to measure, track, and record the performance and execution of the community impact plan that identifies qualitative and quantitative metrics, and includes frequency of tracking such metrics

Community Impact Plan

Overview

The legalization of cannabis in New York and the State's Social and Economic Equity policies call on SWK743 Inc. (the "Company") and the cannabis industry to help address injustices and inequalities resulting from the War on Drugs. The Company is committed to supporting an equitable cannabis marketplace and healthy community development by helping undo harms caused by disproportionate enforcement.

This work requires measurable action and sustained investment. The Company has developed this Community Impact Plan (the "Plan") to benefit communities and individuals disproportionately impacted by the enforcement of cannabis prohibition, as identified in subdivision (d) of Section 121.1 of the Proposed Regulations.

Beneficiaries

The Plan contains three main initiatives, which seek to provide the aforementioned individuals and communities with the following benefits:

- Reducing barriers to employment for justice-involved individuals through targeted hiring, paid training, and mentorship;
- Providing direct support to underserved communities through charitable contributions, including a food drive and a toy drive benefiting a local neighborhood shelter;
- Increasing public education and reducing stigma through an annual free community-based cannabis education event.

These benefits fill a need for social and economic equity by addressing the following harms caused by cannabis criminalization as identified by the Assessment of Potential Impact of Regulated Marijuana in New York State conducted by the New York State Department of Health in 2018.

- Criminal records impede New Yorkers' lives. *"Individuals who have a criminal record often face challenges throughout their lives accessing gainful employment."*
- Incarceration has a negative impact on families and communities. *"Arrests and incarceration negatively impact the health of communities and individuals by destabilizing families, hindering access to education and health care, lowering employment opportunities, increasing poverty, and limiting access to housing, particularly in low-income communities of color where arrests are concentrated despite equivalent rates of marijuana use across racial groups."*
- Marijuana prohibition results in disproportionate criminalization of certain racial and ethnic groups. *"Across the country, individuals who are Black are nearly four times more likely than individuals who are White to be arrested for marijuana possession, despite data showing equal use among racial groups."¹*

¹ New York Department of Health. (2018) Assessment of Potential Impact of Regulated Marijuana in New York State. Retrieved from

Initiatives

- **Justice-Involved Workforce Development:** The Company is committed to reducing barriers to employment for justice-involved individuals from communities disproportionately impacted by the enforcement of cannabis prohibition. The Justice-Involved Workforce Development Initiative (the “Initiative”) is designed to provide structured employment access, paid training, and mentorship opportunities through targeted recruitment and partnerships with reentry and workforce development organizations. The Company will track recruitment activity, training/mentorship hours (including in-kind staff time), retention, and wages paid to participating employees.
 - **Initiative Goal:** Hire at least one justice-involved individual during the two-year plan period and provide a minimum of 40 hours of paid onboarding, responsible vendor/compliance training, and structured mentorship for the first 90 days, with progress tracked through retention and training-hour metrics.
 - **Initiative Strategy:** If needed to meet the goal: (1) Partner with one reentry/workforce development organization to source candidates, (2) post openings through partner channels and participate in at least one reentry-focused hiring event.
- **Charitable Contributions:** The Company is committed to engaging directly with communities disproportionately impacted by the enforcement of cannabis prohibition through charitable initiatives. During the plan period, the Company will organize and host seasonal community donation drives—including a toy drive and a food drive—benefiting a local neighborhood shelter and/or community food pantry that serves families and children in underserved communities. The toy drive will collect new, unwrapped toys and essential children’s items, and the food drive will collect non-perishable food items and essential household goods through voluntary donations from staff, stakeholders, and community members. The Company may also provide matching monetary or in-kind contributions. All donations will be inventoried, documented, and delivered directly to the identified beneficiary organization(s). The Company will track total donations collected (monetary value and quantity), volunteer hours contributed, and beneficiary impact metrics.
 - **Initiative Goal:** Host at least one toy drive and at least one food drive during the two-year plan period benefiting local community-serving organization(s), and raise or donate a combined minimum of \$1,000 in toys, food, goods, or monetary contributions of equivalent value.
 - **Initiative Strategy:** (1) Coordinate directly with the selected neighborhood shelter and/or food pantry to identify needed items and delivery timelines; (2) promote each drive through official company communications and partner organizations; and (3) document total items collected, estimated value of contributions, delivery confirmation, and volunteer labor hours dedicated to planning and executing the donation drives.
- **Community Education Event:** The Company is committed to uplifting communities disproportionately impacted by the enforcement of cannabis prohibition by fostering public education and reducing stigma surrounding regulated cannabis use. The Company

will host an annual community-based educational event focused on cannabis awareness, responsible consumption, and the social and economic equity goals of the Cannabis Law. The event will provide community members with accurate information about regulated cannabis, public health considerations, and the history of disproportionate enforcement, with the goal of supporting informed engagement and reducing misinformation. The Company will ensure the event is free and accessible to the public, and will track attendance, educational materials distributed, and participant feedback.

- **Initiative Goal:** Host at least one free community-based educational event annually during the two-year plan period, serving a minimum of 25 community participants.
- **Initiative Strategy:** (1) Partner with at least one community-based organization, public health group, or local association to co-host the event; (2) provide educational programming focused on responsible use, community wellness, and the equity goals of the MRTA; and (3) document attendance numbers, materials provided, and qualitative participant feedback through surveys or testimonials.

Annual Review

Each year, the Company will review the following criteria in an effort to measure the success of its Community Impact Plan.

1. Identify the number of justice-involved individuals recruited, interviewed, and hired through the Justice-Involved Workforce Development Initiative;
2. Identify the number of training and mentorship hours provided to justice-involved employees, including paid onboarding and responsible vendor/compliance training;
3. Identify retention outcomes and total wages paid to participating justice-involved employees during the plan period;
4. Identify the quantity and estimated value of toys, food items, goods, or monetary contributions donated through the Charitable Contributions initiative;
5. Identify the number of volunteer or staff labor hours dedicated to planning and executing the toy drive and food drive and related charitable activities;
6. Identify the number of community participants attending the annual Community Education Event;
7. Identify the quantity of educational materials distributed and qualitative feedback collected from event participants;
8. Identify the total expenditures, in-kind contributions, and resources allocated toward the execution of each initiative.

Acknowledgements

The Company affirms that it: (1) has confirmed that all of the abovementioned charities have (or will) accept donations from the Company; (2) is aware and will adhere to, the requirements set forth in the Adult-Use Packaging, Labeling, Advertising and Marketing Guidance issued by the Office of Cannabis Management; (3) any actions taken or initiatives implemented will not violate the Office's regulations

with respect to limitations on ownership or control or other applicable state laws; and (4) the Company will be required to document progress of this plan, in its entirety.

Declarations

Vikesh Sharma has the ability to execute the proposed Community Impact Plan as outlined herein.

Vikesh Sharma

Vikesh Sharma

Security, Safety, and Crowd Control Policy

Summary

SWK743 Inc. (“The Company”) has developed a detailed security plan in response to a comprehensive risk assessment that addresses the security and safety of operations conducted at the licensed premises located at 156 Delancey Street, New York, New York 10002. This plan will also serve to assist the State Police (NYSP), the Department of Health (DOH), the Office of Cannabis Management (OCM), and local law enforcement in preventing and detecting the theft or diversion of cannabis and responding to emergency incidents. The following is an overview of SWK743 Inc.’s Security and Safety Policies and Crowd Control Plan.

Security Policies

1. The Perimeter of the Licensed Premise
 - a. The facility will be designed specifically for the secure storage and sale of cannabis.
 - b. The facility is a well-illuminated, commercial building with two secured entrances and an employee-only access door.
 - c. A security guard shall be positioned at the entrance and exit doors of the cannabis dispensary and event area to monitor all individuals entering and exiting the licensed premises.
 - d. No cannabis-related marketing, branding, or advertisements are displayed on or visible from the exterior of the building.
 - e. All perimeter doors and windows shall be locked at all times except for the time required for employees, customers, and visitors to enter or exit.
 - f. An Intrusion Alarm is utilized as outlined in Section 4 below.
 - g. A Key Policy is implemented as outlined in Section 5.
 - h. Video surveillance cameras are positioned to capture clear and certain identification of any person entering or exiting the facility and the point of sale.
2. Limited Access Areas
 - a. The facility layout will be segregated into areas with limited access levels, including areas where cannabis or related surveillance records and system controls are stored.
 - b. The entrance to these areas must remain locked at all times and will only be accessible by employees whose job necessitates their entry. The *Employee-in-Charge* will maintain a list of those with access and make it available to authorities upon request.
 - c. Limited access areas shall have a sign posted at all entryways, which shall be a minimum of 12 inches in height and 12 inches in length. They shall state: “**DO NOT ENTER - Limited Access Area - Access Limited to Authorized Personnel Only**” in lettering no smaller than one inch in height.
 - d. Limited Access Areas shall be designated on the site plan.
3. Storage

- a. All areas where cannabis, currency, or surveillance records are stored within the licensed premises shall be designated as limited access areas according to the Limited Access Areas policies outlined in Section 2.
 - b. Cameras are directed at all safes, vaults, sales areas, and any other area where cannabis or currency is stored.
 - c. Cannabis shall not be maintained on premises in excess of what is required for regular, efficient operation.
 - d. All cannabis in the company's physical storage or possession must be compliantly labeled, packaged, and documented in the inventory tracking system. When accepting new inventory, compare shipping invoices and the digital and printed manifests against incoming physical inventory to ensure the accurate transfer of cannabis products.
 - e. Cannabis items requiring refrigeration will be securely enclosed in a refrigerator or freezer capable of being locked and securely anchored to a permanent structure of an enclosed vault.
4. Intrusion Alarm
- a. The facility has a perimeter alarm that communicates with an internal designee and a third-party commercial central monitoring station when intrusion is detected.
 - b. The monitoring center will be instructed to notify the designated *Security Coordinator* and law enforcement. An alternative *Security Coordinator* is designated in writing. These parties are trained and prepared to provide a timely response at all times.
 - c. The intrusion alarm is armed when the facility is not occupied, and the identity of the individual arming or disarming the alarm is kept on record and made available to authorities upon request.
 - d. Our intrusion alarm system remains operational during power outages for at least eight hours.
5. Key Policies
- a. Company management will authorize in writing key issuance for employees and will only provide them to areas where the need can be demonstrated.
 - b. Keys shall not be left in the locks or stored or placed in a location accessible to individuals not authorized to access cannabis or cannabis products.
 - c. It is against Company policy for keys to be duplicated by any individual except those with written authorization from management.
 - d. The Employee-in-Charge will record all keys issued on file via an *Employee Key Authorization Form*.
 - e. Upon termination of employment, all keys shall be returned and noted as such on the *Employee Key Authorization Form*. If the Company fails to collect key(s) from the leaving employees, a key core change shall be executed.
6. Surveillance System:
- a. Video camera surveillance is in all areas that (1) may contain cannabis or cannabis products, (2) all surveillance areas or rooms and at all points of entry and exit, and (3) in any parking lot, which shall be appropriate for the normal lighting conditions of the area under surveillance.
 - b. Our commercial-grade surveillance system can immediately produce a clear color still photo from any camera image. It allows for the export of still images in an industry-

standard format, compatible with a standard computer operating system, and archived in a proprietary format that ensures authentication and guarantees that no alteration took place.

- c. Cameras are permanently mounted by a professional installer, in a fixed location.
- d. The video synchronizes the time and date stamp embedded in the recordings.
- e. Cameras produce continuous recordings during operating hours and at any time that cannabis or cannabis product is handled, and motion-activated recordings at all other times. These recordings are available via remote access for immediate viewing by authorities upon request. Recordings are retained for at least 60 days.
- f. Access to surveillance areas is restricted, with a list of authorized personnel available to authorities.
- g. During power outages, the system remains functional for at least eight hours, and any loss of access must be reported to the Office of Cannabis Management within 24 hours.

7. Security Guards

- a. Armed security guards must pass extensive background checks and drug tests and hold appropriate licenses and firearms permits, as required by regulations.
- b. Required training encompasses conflict resolution, emergency response, firearm safety, and legal use-of-force guidelines.
- c. Professional behavior is mandated, with no tolerance for discrimination or unnecessary force; uniforms must be professional and include identification.
- d. Responsibilities include age verification, patrolling, monitoring suspicious activities, ensuring safety, and asset protection.
- e. Use of force is strictly a last resort, with firearm use limited to direct threats to life, necessitating immediate report and documentation.
- f. Regular communication with management is required to maintain security efficacy and report incidents. All security actions must be documented within 24 hours.
- g. Compliance with legal standards for armed security is essential, including annual verification of licenses and performance reviews to ensure policy adherence.

8. Parking Lot

- a. Parking is available on a first-come, first-served basis, with designated spots for individuals with disabilities, possessing valid permits.
- b. Security and staff monitor compliance with parking policies, and non-compliance can result in warnings, towing, or bans.
- c. Drivers must adhere to posted speed limits, traffic signs, and safety notices within the parking lot to ensure the safety of pedestrians, other vehicles, and personal property.
- d. Parking is for the duration of the patron's visit; unauthorized extended parking may lead to towing.
- e. Loitering, overnight parking, substance consumption, and unauthorized business activities in the parking lot are prohibited.
- f. Users of the parking lot are expected to keep the area clean and dispose of trash in the provided receptacles. Staff shall maintain the cleanliness of the area.

9. Law Enforcement Support

- a. The Company prioritizes strong partnerships with local law enforcement agencies. These agencies support our security mission through observation patrols, incident response, and proactive meetings.
- b. Law enforcement may be granted access to video surveillance recordings or limited access areas as needed.

10. Hours of Operation

- a. When the facility is closed, it shall be securely locked, and the Intrusion alarm shall be activated.
- b. The Company has implemented additional security measures within its opening and closing procedures.

11. Employee and Visitor Identification

- a. All licensees and employees on the licensed premises shall be required to hold and correctly display an identification badge issued by the licensee at all times while on the licensed premises or when engaged in the transportation of cannabis or cannabis products. The identification badge shall include, at a minimum, the following information: employee's first and last name, employee's photograph, licensee's legal name, and licensee's license number.
- b. Non-employee visitors to the licensed premises, other than customers at the retail store, shall be required to hold and correctly display an identification badge at all times while on the licensed premises.
- c. The licensee shall maintain a visitor log of all persons, other than employees, permitted cannabis laboratories or laboratory sampling firms, and emergency personnel responding to an emergency, on the licensed premises for five years and be made readily available to authorities upon request. The log shall include the following information: the full name of each visitor, the company the individual works for, the time of arrival, the time of departure, and the purpose of the visit. All visitors must always be escorted while on the premises.
- d. The movement of employees throughout the internal premises shall be monitored by video surveillance. Employee time tracking will be performed to maintain a record of all staff on duty.

12. Age Verification

- a. Upon entering the dispensary, all individuals must present a valid, government-issued photo ID. Acceptable forms of ID include a valid driver's license, passport, or military ID that clearly shows the date of birth.
- b. A secondary age verification will be conducted at the point of sale to ensure the individual making the purchase is the same as the person identified in the ID. The cashier will verify the age and ID authenticity before proceeding with any sale.
- c. For online orders, age verification will occur at both the time of purchase and upon pickup/delivery. An ID check will match the name on the order to the individual receiving the products.
- d. All staff members are trained on the *Age Verification Policy* and required to adhere to its procedures without exception. Regular audits will be conducted to ensure compliance, and disciplinary action will be taken for policy violations.

- e. The dispensary reserves the right to refuse service to anyone unable to produce valid identification or anyone suspected of purchasing on behalf of a minor.

13. Cannabis Dispensing

- a. Sales will adhere to state-mandated possession limits for individuals to prevent unlawful accumulation or distribution. Customers will be informed of their purchase limits at the time of sale.
- b. Staff will provide information on safety precautions for cannabis consumption..
- c. All cannabis transactions will be recorded in compliance with state regulations.
- d. All cannabis shall be tested for consumer safety and sourced from NYS licensed producers.

14. Waste Handling

- a. Cannabis waste shall be rendered unusable and maintained in a secured waste receptacle or secured area on the licensed premises until the time of disposal.
- b. Cannabis waste disposal areas shall remain under video surveillance as outlined in Section 6.

15. Suspicious Activity and Incident Reporting

- a. The Office of Cannabis Management shall be notified about security breaches or incidents as per Section 125.1, Title 9, New York State Regulations.
- b. Within 10 days, an incident report form detailing the incident, corrective actions taken, and law enforcement notifications will be submitted to the OCM.
- c. All documentation related to an incident shall be maintained for five years and the duration of an open investigation and made available to the OCM and law enforcement authorities within their lawful jurisdiction upon request.

16. Information Security

- a. The facility's network infrastructure will be encrypted and password-protected as appropriate. Only authorized personnel trained in secure records management procedures will have access to facility data. System users will have role-based authentication. Sharing of logins shall be strictly prohibited. The software will require security measures such as login timeouts, strong passwords, periodic required password changes, prohibitions of repeated password use, and administrators' ability to disable user access.
- b. Data will be stored on a secure cloud-based commercial data server.
- c. E-mailing sensitive data files to anyone outside the applicant's organization is strictly prohibited without permission. Customer-specific transaction data and contact information, including e-mail addresses, will not be shared with any third party without the customer's permission.
- d. The Inventory Tracking System utilizes the following cyber security controls: a security key to access the system's backend, SSL certificates, Multi-Factor Authentication logins, daily log file security reviews, and data encryption.

17. Shipping and Receiving

- a. Cannabis transportation to and from the premises shall occur during normal business hours to decrease the risk of a crime against vendors and employees. Transportation schedules will be staggered to avoid the development of patterns.
- b. Transportation personnel shall be identified, verified, and cleared before entering the facility.

- c. The appointed *Inventory Manager* shall take the digital and physical inventory. Manifests shall be compared against incoming and outgoing products to ensure successful transfers and to prevent the diversion of cannabis products.
 - d. Product shipments shall be accepted in an area inaccessible to customers or unauthorized personnel.
18. Cash Handling
- a. The *Employee-in-Charge* will be responsible for proper accounting, transacting, and currency handling.
 - b. Currency on-site will be stored in a burglary-resistant safe appropriate for the amount stored. If the average currency storage exceeds the standard for the safe installed, additional safes or a replacement safe will be installed.
 - c. Cash deposits to financial institutions must be escorted discreetly in a tamper-evident deposit bag.

Safety Policies

1. Emergency Response: Emergency response shall be in accordance with an "all-hazards" approach. Such incidents may include bomb threats, fires, earthquakes, hazardous materials release, floods, severe weather, civil disturbances, pandemic flu, serious accidents, and criminal activity. The elements of SWK743 Inc.'s Emergency Response Plan, as required by OSHA code 29 CFR 1929.35, are as follows:
- a. The *Emergency Plan Coordinators* are responsible for implementing the procedures in this plan. They may also be responsible for accounting for employees or visitors after an evacuation.
 - b. Reporting Emergency Situations. All fires and other emergencies will be reported to the *Employee-in-Charge* as soon as possible, either verbally or by telephone.
 - c. Under no circumstances will an employee attempt to fight a fire after it can no longer be put out with a fire extinguisher, nor will any employee attempt to enter a burning building to conduct search and rescue. These actions must be left to emergency services professionals (such as the fire department or emergency medical professionals) with the necessary training, equipment, and experience. Untrained people might endanger themselves or those they are trying to rescue.
 - d. Evacuation Routes. Emergency evacuation escape route plans (See *Emergency Escape Route Diagram*) are posted throughout the premises. In the event that a fire or emergency alarm is sounded or instructions for evacuation are given, all employees must immediately exit the buildings at the nearest exits and must meet as soon as possible at the *Designated Assembly Area*. All doors must be closed as employees exit the area.
 - e. Securing Property and Equipment. Sensitive items must be secured to prevent further danger to the facility and personnel. All people remaining behind to shut down critical systems or utilities must be capable of recognizing when to abandon the operation or task. Once the property or equipment has been secured, or the situation becomes too dangerous to remain, those who remained behind must exit the building by the nearest escape route as soon as possible and meet the remainder of the employees at the *Designated Assembly Area*.

- f. Advanced Medical Care. Under no circumstances may an employee provide advanced medical care and treatment. These situations must be left to emergency services professionals or those who have the necessary training, equipment, and experience. Untrained people might endanger themselves or those they are trying to assist.
 - g. Accounting for Employees/Visitors After Evacuation. Once an evacuation has occurred, the *Employee-in-charge* will account for each employee or visitor on the premises during the evacuation using timesheets and the *Visitor Log*. Each employee is responsible for reporting to the appropriate person.
 - h. Re-Entry. Once the building has been evacuated, no one may re-enter the building for any reason, except for designated and properly trained rescue personnel (such as fire department or emergency medical professionals). All employees and visitors must remain at the *Designated Assembly Area* until the fire department or other emergency response agency determines if the building is safe for re-entry, in which case personnel will return to their workstations. If they determine that the building or assembly area is not safe, the *Employee-in-charge* will instruct personnel to vacate the premises.
 - i. Sheltering-in-Place. In the event that chemical, biological, or radiological contaminants are released into the environment in such quantity or proximity to premises, authorities and/ or the emergency plan manager might determine that it is safer to remain indoors rather than evacuate. The *Employee-in-Charge* will announce shelter-in-place status by radio, telephone, or direct communication and follow these steps:
 - i. Immediately close access to the premises. If visitors are in the building, they will be advised to stay in the building for their safety.
 - ii. Unless there is an imminent threat, employees and visitors shall call emergency contacts to let them know where they are and that they are safe.
 - iii. Notify any expectant arrivals that the building is closed and that staff and visitors will remain in the building until authorities advise that it is safe to leave.
 - iv. Lock exterior doors and close windows and air vents. If there is a danger of explosion, all window shades, blinds, or curtains must be closed.
 - v. Gather essential disaster supplies, which are stored in a designated location, and will take them to the shelter-in-place locations within the building.
 - vi. All employees, customers, and visitors will move immediately to the shelter-in-place locations within the building. The Employee in Charge will write down the names of everyone in the room.
 - vii. Monitor telephone, radio, television, and internet reports for further instructions from authorities to determine when it is safe to leave the building.
 - j. Severe Weather. The *Security Coordinator* will announce severe weather alerts (such as tornadoes) by radio, telephone or direct communication. All employees will immediately retreat to the shelter-in-place area until the threat of severe weather has passed.
 - k. Employee Training. All employees will receive sufficient training on this Emergency Action Plan as part of new-employee training and annually.
 - l. Fire/Evacuation Drills. The Company shall conduct Fire Drills annually.
2. Staff Safety Policies.
- a. Personal Protective Equipment will be provided to all employees and employees are expected to comply with the guidelines of its use.

- b. Only closed-toed and closed-heeled shoes are permitted on the premises.
- c. Food and drink will not be consumed or stored in areas that could risk contamination with chemicals or cannabis, cannabis products, and other merchandise.
- d. The Company shall follow all applicable federal, state, and local laws and regulations related to worker training, safety, and health.
- e. Employees must comply with a written alcohol-free, violence-free and drug-free workplace policy.
- f. Safety data sheets shall be maintained consistent with the Occupational Safety and Health Administration (OSHA) standards pursuant to 29 CFR §1910.1200 Hazard Communication and a record of any chemical onsite must be maintained.
- g. Emergency signage is posted in all areas. Signs that provide clear instructions for product handling, equipment operation, and general safety are installed. Potential hazard areas are marked with warning signs in English and primary language.

Crowd Control and Customer Flow

The primary objective of this policy is to ensure the safety, security, and well-being of both customers and employees within the premises. Through effective crowd control and customer flow management, we aim to provide a seamless, positive experience that complies with regulatory standards and promotes a conducive shopping environment. The following shall serve as a detailed overview of SWK743 Inc.'s policies related to crowd control and customer flow.

1. Capacity Management
 - a. The facility's maximum customer capacity will be clearly defined based on square footage and space requirements. This capacity limit will be prominently displayed at all entrances.
 - b. If needed, a designated waiting area will be established along the perimeter of the facility's exterior. This area will be monitored to prevent overcrowding and traffic obstruction.
2. Entry and Exit Management
 - a. A numbered ticket system or digital queue app will regulate entry to the dispensary to prevent overcrowding as necessary.
 - b. Separate entrances and exits will be clearly marked to facilitate smooth customer flow. Signage and staff members will direct customers accordingly.
3. Movement Within the Dispensary
 - a. Strategic placement of signs shall guide customers through the dispensary, directing them along preferred paths to minimize congestion.
4. Staffing and Security
 - a. Designated staff will manage crowd control, with additional security for more significant events. Staff duties will include counting customers, managing queues, and ensuring compliance with the policy.
5. Communication Strategy

- a. SWK743 Inc. shall use signage and digital platforms to communicate policy details, directions, and updates regarding peak times, safety protocols, and any changes to crowd control procedures.
6. Special Events and Promotions
 - a. Any event expected to attract increased foot traffic will have a detailed plan that includes extended operational hours, additional staff and security, and pre-event customer notifications via email or social media.
 - b. An appointment system will be implemented to distribute customer visits evenly throughout the duration of highly anticipated product releases or sales events.
7. Online Orders and Pickup Process
 - a. To further enhance our crowd control measures and ensure a streamlined customer experience, our dispensary will implement an online order system to minimize in-store congestion and customer convenience.
 - b. Customers can place orders online through our dispensary's official website or designated mobile app.
 - c. To manage customer flow efficiently, customers placing online orders will be assigned specific time slots for pickup.
 - d. A designated area within the dispensary will be established for the exclusive purpose of order pickups.
 - e. Employees will receive specialized training to handle online orders and customer pickups effectively.
 - f. We will continuously monitor the effectiveness of the online order and pickup system, making necessary adjustments based on customer feedback, staff input, and observed operational challenges.
8. Compliance and Continuous Improvement
 - a. This policy will be aligned with all relevant local, state, and federal laws and regulations.
 - b. All employees will receive training on this policy and are expected to enforce and adhere to its guidelines. Customers' non-compliance will be addressed respectfully and promptly to ensure the safety and security of all individuals on the premises.
 - c. Regular assessments will be conducted to gauge the effectiveness of crowd control measures. Feedback from customers and staff will be actively sought and used to make necessary adjustments. Amendments will be communicated to all staff and reflected in training materials.