GRAMA Claim of Business Confidentiality

Pursuant to Utah Code Section 63G-2-305(1) and (2), and in accordance with Section 63G-2-309, Boojum Med (company name) asserts a claim of business confidentiality to protect the following information submitted as part of a Request for Proposals.

- ☐ non-public financial statements
- ☒ specific employee name and contact information
- ☐ specific customer information, client lists, or subscription lists
- ☒ other (specify):

Private and proprietary information

This claim is asserted because this information requires protection as it includes:

☒ trade secrets as defined in Utah Code Section 13-24-2 ("Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, or process, that: (a) derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and (b) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.)

☒ commercial information or non-individual financial information obtained from a person if: (a) disclosure of the information could reasonably be expected to result in unfair competitive injury to the person submitting the information or would impair the ability of the governmental entity to obtain necessary information in the future; [and] (b) the person submitting the information has a greater interest in prohibiting access than the public in obtaining access.

Following is a concise statement of reasons supporting the claim of business confidentiality:

The information has been redacted to keep our personal information private and for the safety and security of our facility and employees.
Our extensive research on how the cannabis plant and the cannabinoid molecules interact with the human body has enhanced the efficacy of our products and continues to inform our evolving and proprietary lab processes and facility procedures.
Our internal research and development and subsequent facility implementation is considered confidential and a trade secret as defined in Utah Code Section 13-24-2.
All renewal information that could potentially create an unfair competitive injury to our business, or create a safety concern for our team has been redacted.

Signed: Britni King

On behalf of (company): Boojum Med

Date: 3/31/26

Ownership and Contact Information			
Ownership Entity	Boojum Group LLC		
Business Contact:			
Name	Britni King		
Business Phone	[redacted]	**Fax**	
Other Phone		**Email**	[redacted]
Facility Manager Contact:			
Name Ben Cheatwood	**Phone** [redacted]	**Email** [redacted]	
Contact Person for Inspection:			
Name Olivia Kulander	**Phone** [redacted]	**Email** [redacted]	
Contact Person for Sampling/Results:			
Name Britni King	**Phone** [redacted]	**Email** [redacted]	
DBA • Boojum Group			
Facility Address			
Street	[redacted]		
[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]
Mailing Address			
Street	[redacted]		
[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]

Application Locations

*An owner is a person who, if the company is privately held, has a financial or voting interest of **2%** or greater in the cannabis production establishment; or if the entity is publicly traded has more than a **2%** financial interest in the company; or is an individual who has the power to direct or cause the management or control of a facility, in other words is a general manager of daily operations.*

List all Owners and their positions in the Company

Legal Name	Address	Role in Companies Finances or Decisions	Date of Birth	Listed on Initial Application
Dashiel Kulander	[redacted]	[redacted]	[redacted]	☑ Yes ☐ No
Britni King	[redacted]	[redacted]	[redacted]	☑ Yes ☐ No

Upload descriptions of the credentials and experience of each officer, director, and owner and prospective employee who have a financial or voting interest of 2% or greater in the proposed cannabis production establishment; or the power to direct or cause the management or control of a proposed cannabis production establishment: A. Include a description of any investigation or adverse action taken by any licensing jurisdiction, government agency, law enforcement agency, or court in any state for any violation or detrimental conduct in relation to any of the applicant's cannabis-related operations or businesses.

Property Information

Days and Hours of Operation
9 AM - 5 PM

Days Open for Business (Projected)
250

All information in this section must follow specific requirements as outlined in Utah Administrative Rule: Cannabis Cultivation (R66-1), Cannabis Processing (R66-2), Quality Assurance Testing on Cannabis (R66-3), and/or Independent Cannabis Testing Laboratory (R66-4) as applicable to the license type you are seeking.

Please upload the establishment's current facility blueprint with:

a) the square footage of the areas where cannabis is extracted;
b) the square footage of the area(s) where cannabis products are manufactured;
c) location of all extraction machinery/ stationary equipment;
d) the square footage of the areas used for storage and what type of product is stored there (i.e crude oil, untested products, final tested product) ;
e) the areas where cannabis is to be dried, trimmed, and cured (if applicable);
f) the square footage of the areas where cannabis is to be packaged;
g) the location of the toilet facilities and hand washing facilities;
h) the location of a break room;
i) the location of lobby or area where non-agents can access;
j) the location of the areas to be used for loading and unloading of cannabis products for transportation; and
k) the location of all cameras and external lights. [1] ☑ Attached

Operating Plan

Submit the proposed cannabis facility's most up-to-date security plan. Security plans shall include:

a) Description of security alarm system
b) Person(s) notified of potential security breaches and alerts
c) Video storage device location: local or cloud storage
d) Procedures to provide UDAF inspectors immediate access to current and archived video footage when requested
e) Any additional security measure in place that exceed the security requirements
f) Visitor Policy
g) Description of backup power source and SOP for power outage. [2] ☑ Attached

Describe the proposed cannabis facility's Inventory Control System (ICS) and detail the procedures the facility will employ to meet the ICS requirements of Utah Code 4-41a-103 and Utah Administrative Rule related to inventory control. Include a description of how the facility will comply with section 4-41a-2 and use the state Electronic Verification System to track facility agents. [3]

☑ Attached

Provide the proposed cannabis facility storage protocols, both short and long-term, to ensure all cannabis is stored in a manner that is sanitary and preserves the integrity of the cannabis. [4]

☑ Attached

Provide all written emergency procedures to be followed in case of fire, chemical spill and other emergencies at the cannabis facility. This information plus the Material Safety Data Sheet (MSDS) must be easily accessed by all employees. [5]

☑ Attached

Provide the proposed cannabis facility's waste disposal plan. Explain how the facility will comply with Utah Code 4-41a-405 and Utah Administrative Rule related to waste disposal. [6]

☑ Attached

Detail the procedures the cannabis facility will employ to meet the transport and transfer requirements of Utah Code 4-41a-404 Medical cannabis transportation. Include the cannabis facility's sample transport and transfer plan in accordance with all applicable Utah Administrative Rules regarding the transportation of medical cannabis. [7]

☑ Attached

Does the licensee complete Research and Development [8] ☑ Yes ☐ No

GRAMA Claim of Business Confidentiality

Pursuant to Utah Code Section 63G-2-305(1) and (2), and in accordance with Section 63G-2-309, Boojum Med (company name) asserts a claim of business confidentiality to protect the following information submitted as part of a Request for Proposals.

- ☐ non-public financial statements
- ☑ specific employee name and contact information
- ☐ specific customer information, client lists, or subscription lists
- ☑ other (specify):

Address, security system details and layout of new facility.

This claim is asserted because this information requires protection as it includes:

☑ trade secrets as defined in Utah Code Section 13-24-2 ("Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, or process, that: (a) derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and (b) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.)

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Following is a concise statement of reasons supporting the claim of business confidentiality:

The information has been redacted to keep our personal information private and for the safety and security of our facility and employees.

Signed: Britni King

On behalf of (company): Boojum Med

Date: 4/10/26

GRAMA Claim of Business Confidentiality

Pursuant to Utah Code Section 63G-2-305(1) and (2), and in accordance with Section 63G-2-309, Wasatch Extraction, LLC (company name) asserts a claim of business confidentiality to protect the following information submitted as part of a Request for Proposals.

- [X] non-public financial statements
- [X] specific employee name and contact information
- [X] specific customer information, client lists, or subscription lists
- [ ] other (specify):

This claim is asserted because this information requires protection as it includes:

[X] trade secrets as defined in Utah Code Section 13-24-2 ("Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, or process, that: (a) derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and (b) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.)

[X] commercial information or non-individual financial information obtained from a person if: (a) disclosure of the information could reasonably be expected to result in unfair competitive injury to the person submitting the information or would impair the ability of the governmental entity to obtain necessary information in the future; [and] (b) the person submitting the information has a greater interest in prohibiting access than the public in obtaining access.

Following is a concise statement of reasons supporting the claim of business confidentiality:

Because of the nature of the business, names, phone numbers, addresses, and any personal information needs to be protected to reduce harassment or potential crime against Wasatch Extraction employees or ownership.

Signed: Darren Johnson

On behalf of (company): Wasatch Extraction, LLC

Date: 04/01/2026

WASATCH
EXTRACTION

Medical Cannabis Processing

Application

COMPANY OVERVIEW

Wasatch Extraction was started in January of 2019 and was created to be the best hemp extractor in Utah. Wasatch Extraction transitioned into medical cannabis extraction and through the use of state of the art equipment, a food grade facility, and quality employees, we have created great products and medicine and earned a good reputation with the patients of Utah.

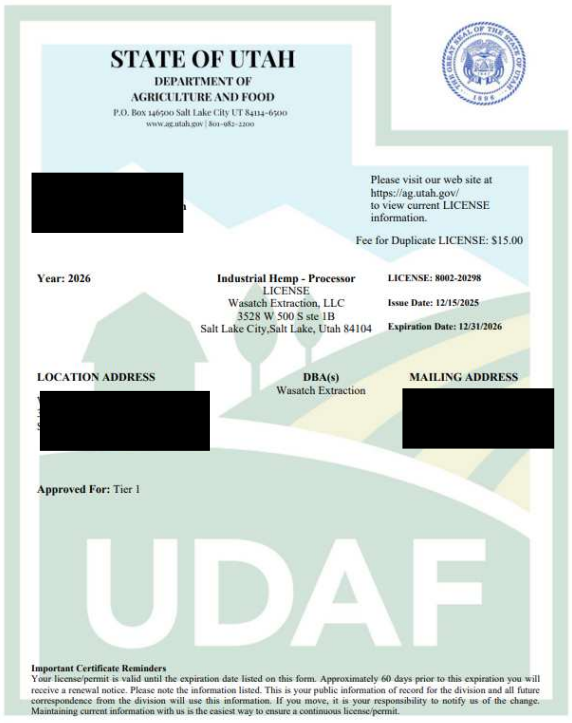
- **Company Summary:** Wasatch Extraction is a GMP compliant extraction lab with the capacity to extract cannabis using ethanol, BHO, solventless, and CO2 extraction methods.
- **Mission Statement:** To provide the patients of Utah with the finest quality medical cannabis at an affordable price.
- **Company History:** Wasatch Extraction was created to be a top tier hemp extraction lab in Utah to service the farmers and cultivators that embraced the cannabis sativa plant. When we began, we had little more than CO2 extractors but quickly built out a potency lab for inhouse testing and then expanded our capacity by investing in high throughput ethanol extraction equipment. Wasatch became a medical cannabis extractor in 2020 and since then, has primarily focused on the medical side of the industry. Since becoming a licensed medical extractor, we have expanded our extraction capabilities to include solventless and BHO extraction.
- **Location:** Our facility is located close to the Salt Lake City Airport and just 3 miles from the Utah Department of Agriculture and Food and the Utah Department of Health. We believe this central location is beneficial as Salt Lake is the heart of Utah and the proximity to the overseeing government entities will allow us to maintain a close relationship. The physical address of the facility is [redacted]
- **Markets, Products and Services:** Wasatch Extraction will primarily focus on extracting oils and concentrates for the use of medical patients throughout Utah. Our facility allows us to create final products with oils such as tinctures, topicals, vape carts, and edibles. We also have the space to package flower and other end use goods.

Business Team

Owner - [redacted] has been a successful business owner for the past 18 years and helped establish Wasatch Extraction in January 2019. [redacted] has extensive knowledge regarding cannabis cultivation and extraction and has spent a lot of time as a consultant in California to optimize grow and extraction processes for various farms and facilities.

General Information

- **1) Ownership Entity:** Wasatch Extraction, LLC
- **2) DBA:** None
- **3) Processing Facility Address:** [redacted]
- **4) Days Open:** Monday – Thursday 9:00am – 3:00pm, Fridays 9:00am – 1:00pm
- **5) Mailing Address:** [redacted]
- **6) Business Phone:** [redacted]
- **7) Facility Manager Contact:** [redacted]
- **8) Inspection Contact:** [redacted]
- **9) Contact Person for Sampling/Results:** [redacted]
- **10) Owner/Manager:** [redacted]
- **11) Other Hemp License:**



STATE OF UTAH
DEPARTMENT OF
AGRICULTURE AND FOOD
P.O. Box 146500 Salt Lake City UT 84114-6500
www.ag.utah.gov | 801-982-2200

[redacted]

Please visit our web site at
https://ag.utah.gov/
to view current LICENSE
information.

Fee for Duplicate LICENSE: $15.00

Year: 2026

Industrial Hemp - Processor
LICENSE
Wasatch Extraction, LLC
3528 W 500 S ste 1B
Salt Lake City,Salt Lake, Utah 84104

LICENSE: 8002-20298
Issue Date: 12/15/2025
Expiration Date: 12/31/2026

LOCATION ADDRESS
[redacted]

DBA(s)
Wasatch Extraction

MAILING ADDRESS
[redacted]

Approved For: Tier 1

UDAF

Important Certificate Reminders
Your license/permit is valid until the expiration date listed on this form. Approximately 60 days prior to this expiration you will receive a renewal notice. Please note the information listed. This is your public information of record for the division and all future correspondence from the division will use this information. If you move, it is your responsibility to notify us of the change. Maintaining current information with us is the easiest way to ensure a continuous license/permit.

- **11) Performance Bond:**



PROSURE GROUP
BONDING TOGETHER . BUILDING TOGETHER

7217 Benjamin Road
Tampa, FL 33634
(813) 243-1110
(813) 243 -1109 fax
commercialbonds@prosuregroup.com
www.prosuregroup.com

CONTINUATION CERTIFICATE

The **Lexington National Insurance Corporation** (hereinafter called the Company) hereby continues in force -*with no lapse in coverage* - its Bond No. **L213297-2105** in the sum of **Fifty Thousand & 00/100** U.S. Dollars (**$50,000.00**), on behalf of **Wasatch Extraction, LLC** in favor of **Utah Department of Agriculture and Food** for the (extended) term beginning on **April 24, 2024**, and ending on **April 23, 2025**, subject to all the covenants and conditions of said Bond.

This Continuation is executed upon the express condition that the Company's liability under said Bond and this and all continuations thereof shall not be cumulative and shall in no event exceed the sum of **Fifty Thousand & 00/100** U.S. Dollars (**$50,000.00**).

IN WITNESS WHEREOF, the Company has caused this instrument to be signed by its officers proper for the purpose and its corporate seal to be hereto affixed this March 7, 2024.

Lexington National Insurance Corporation
(Surety)

Witness: Brandy Bci

By:

David B. Shick, Attorney-In-Fact
(Title)

LEXINGTON NATIONAL INSURANCE CORP. INCORPORATED 1989 FLORIDA

SURETY BONDS
Performance Bonds | Contract Bonds | License Bonds | Court Bonds

- **13) Scale Compliance & Food Establishment Certification:**

Fee for Duplicate Certificate: $15.00

Important Registration Reminders

Your registration is valid until the expiration date listed on this certificate. Approximately 60 days prior to this expiration you will receive a renewal notice.
Listed below are your current mailing and location addresses of record with the division. If you move, it is your responsibility to notify us of any change. To make any address change, please log in at ag.utah.gov/online services.

WASATCH EXTRACTION LLC
[redacted]

If you have any questions please visit our web site:

http://ag.utah.gov/licensing.html

Mail: Department of Agriculture and Food
4315 S 2700 W
TSOB South Bldg, Floor 2
Taylorsville, UT 84129-2128

Phone: (801) 982-2253 Food Compliance Program
Phone: (801) 982-2260 Weights and Measures Program
Fax: (385) 465-6023

Year: 2026

Certificate No: 212796

CERTIFICATE OF REGISTRATION FOR

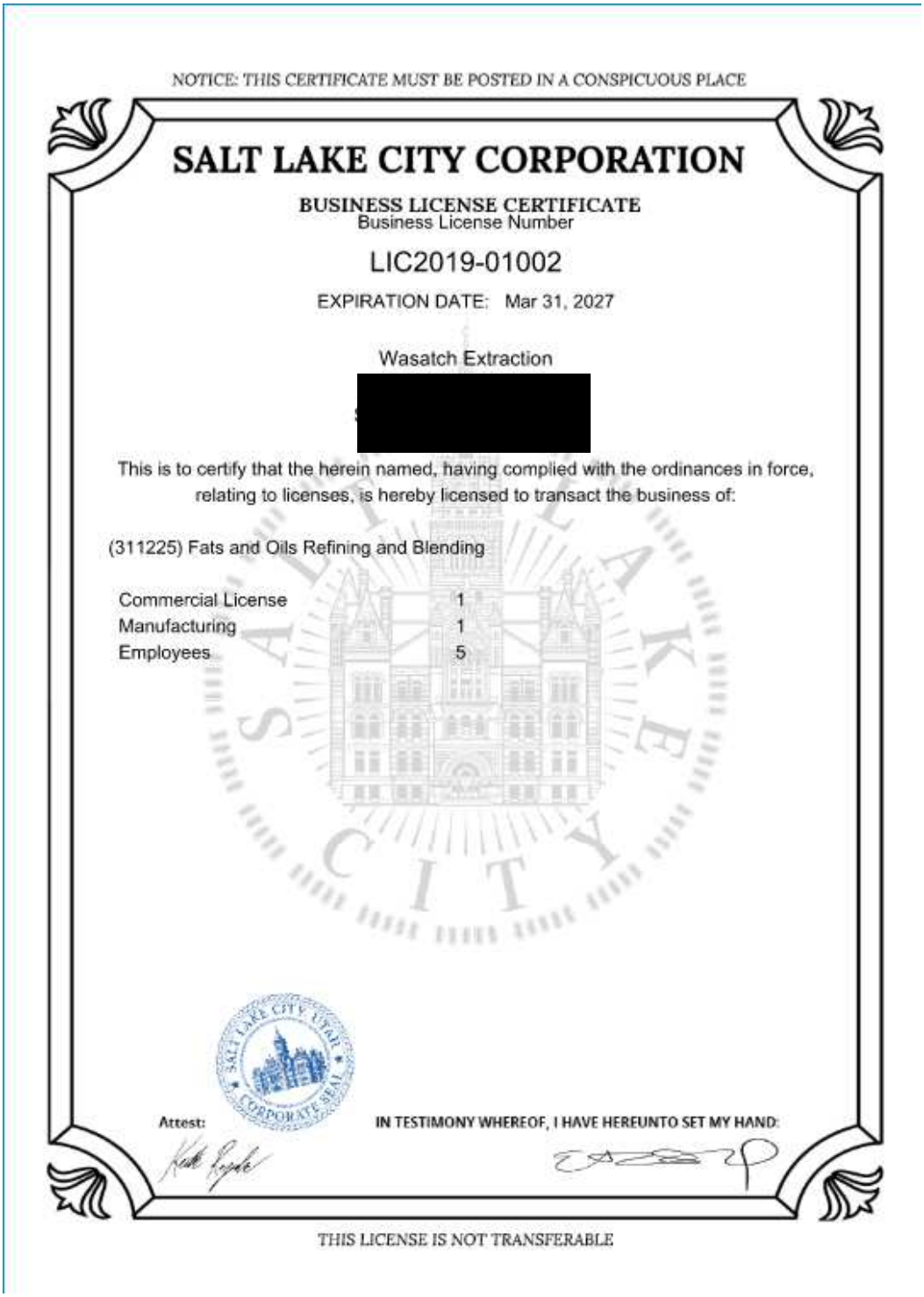
Food Establishment
And
Weights and Measures Devices

WASATCH EXTRACTION LLC
MEDICAL CANNIBIS PROCESSOR
[redacted]

Categories:
Food Compliance Program: LARGE
Weights & Measures Program: Small Scale (1)

Registration Expires: 12/31/2026

- **14) Local Business License:**



NOTICE: THIS CERTIFICATE MUST BE POSTED IN A CONSPICUOUS PLACE

SALT LAKE CITY CORPORATION

BUSINESS LICENSE CERTIFICATE
Business License Number

LIC2019-01002

EXPIRATION DATE: Mar 31, 2027

Wasatch Extraction

[redacted]

This is to certify that the herein named, having complied with the ordinances in force, relating to licenses, is hereby licensed to transact the business of:

(311225) Fats and Oils Refining and Blending

Commercial License	1
Manufacturing	1
Employees	5

Attest:

IN TESTIMONY WHEREOF, I HAVE HEREUNTO SET MY HAND:

THIS LICENSE IS NOT TRANSFERABLE

- **Registered Agents with Wasatch Extraction:**
  - [redacted]

Hemp Storage Standard Operating Procedure

Wasatch Extraction – Cannabis Processing Establishment

1. Purpose

The purpose of this Standard Operating Procedure (SOP) is to establish protocols for the storage and handling of industrial hemp at the Wasatch Extraction facility. These procedures ensure that hemp materials are stored in a manner that maintains clear separation from medical cannabis materials and complies with applicable state regulations.

Wasatch Extraction maintains a hemp processing license; however, the facility currently has no plans to actively process hemp material. The license is maintained primarily for regulatory and tax compliance purposes.

Existing hemp inventory currently stored at the facility consists of legacy material that is in the process of being disposed of under state supervision.

---

2. Hemp Storage Procedures

All hemp materials stored at the facility will be maintained in a manner that ensures they remain clearly segregated from medical cannabis inventory.

Hemp storage procedures include:

• storing hemp materials in designated areas separate from cannabis processing areas
• maintaining separation between hemp materials and medical cannabis products
• restricting access to authorized facility personnel only
• maintaining hemp inventory in a clean and orderly storage environment

Hemp materials will not be introduced into cannabis production or medical cannabis inventory systems.

---

3. Separation from Medical Cannabis

Hemp material stored at the facility will be kept physically separated from all medical cannabis materials.

Separation procedures include:

• storing hemp inventory in a designated storage location separate from cannabis inventory
• maintaining distinct labeling identifying hemp materials
• ensuring hemp materials are not stored in the same containers, shelving, or inventory areas as medical cannabis
• preventing commingling of hemp materials with cannabis products or cannabis processing equipment

This separation ensures that hemp materials cannot be confused with or accidentally introduced into medical cannabis processing operations.

---

4. Inventory and Identification

Any hemp materials stored at the facility will be maintained separately from cannabis inventory records.

Hemp materials will not be entered into the medical cannabis inventory tracking system unless specifically authorized by state regulations.

---

5. Disposal of Legacy Hemp Material

Wasatch Extraction currently has legacy hemp material stored onsite that is no longer intended for use.

The facility has previously coordinated with state inspectors who have supervised the disposal of this material. Wasatch Extraction will continue to dispose of remaining hemp inventory in accordance with state regulatory guidance until all legacy hemp materials have been removed.

Until disposal occurs, hemp materials will remain securely stored and segregated from medical cannabis inventory.

---

6. Future Hemp Processing

Although Wasatch Extraction maintains a hemp processor license, the facility does not currently plan to conduct hemp extraction or processing operations.

If hemp processing operations are initiated in the future, the facility will implement appropriate procedures to ensure continued regulatory compliance and separation from medical cannabis operations.

Processing Establishment Property Information

Wasatch Extraction Building Layout



Wasatch Extraction Security Layout



Current Good Manufacturing Practices (cGMP) Compliance Plan

Compliance with 21 CFR Part 111 Principles

1. Purpose

Wasatch Extraction maintains operational procedures consistent with the principles outlined in 21 CFR Part 111 – Current Good Manufacturing Practices (cGMP) for Dietary Supplements. These procedures are implemented to ensure that cannabis products are manufactured, packaged, labeled, and held in a manner that ensures product identity, quality, purity, and safety.

The facility maintains written Standard Operating Procedures (SOPs), quality control procedures, sanitation programs, and batch production records to ensure consistent manufacturing practices.

---

2. Personnel Qualifications and Training

Wasatch Extraction ensures that all employees performing manufacturing, processing, packaging, labeling, or holding operations are qualified for their assigned duties.

Procedures include:

- employee training on facility SOPs and safety procedures
- training on sanitation and contamination prevention
- training on proper equipment operation
- documentation of employee training records

Personnel are required to follow proper hygiene practices and wear appropriate personal protective equipment (PPE) while working in production areas.

---

3. Facility and Grounds

The facility is designed and maintained to prevent contamination and ensure safe manufacturing operations.

Facility controls include:

- dedicated production and storage areas
- restricted access to authorized personnel only
- pest control and sanitation programs

- proper lighting, ventilation, and environmental controls
- clearly defined processing and storage zones

All work areas are maintained in a clean and orderly condition.

---

4. Equipment and Utensils

All equipment used in manufacturing and packaging operations is designed, maintained, and cleaned to prevent contamination and ensure consistent product quality.

Equipment procedures include:

- routine cleaning and sanitation of processing equipment
- inspection and maintenance of extraction and processing systems
- documentation of equipment cleaning procedures
- use of food-grade or pharmaceutical-grade contact surfaces when applicable

Equipment used in cannabis extraction and product formulation is maintained according to manufacturer recommendations.

---

5. Production and Process Controls

Wasatch Extraction maintains production controls to ensure that cannabis products are manufactured according to approved formulations and processing procedures.

Controls include:

- batch production records documenting each manufacturing run
- verification of raw material inputs
- monitoring of processing parameters during extraction and formulation
- documentation of processing steps and production yields

Each product batch is assigned a unique identifier and tracked through the facility's inventory control system.

---

6. Quality Control Operations

Quality control procedures are implemented to ensure that finished products meet established specifications for safety and quality.

Quality control procedures include:

- verification of incoming raw materials
- monitoring of manufacturing processes
- inspection of finished product packaging and labeling
- laboratory testing of finished products as required by state regulations
- review of laboratory Certificates of Analysis prior to product release

Quality control personnel review batch records before products are released for distribution.

---

7. Packaging and Labeling Operations

Packaging and labeling procedures ensure that cannabis products are packaged and labeled accurately and in compliance with applicable regulations.

Procedures include:

- verification of correct packaging materials
- inspection of labels for accuracy and regulatory compliance
- confirmation of batch identifiers and product information
- documentation of packaging operations

Finished products are packaged in tamper-evident containers as required by applicable regulations.

---

8. Holding and Storage

Raw materials, in-process materials, and finished products are stored under controlled conditions to prevent contamination, degradation, or mix-ups.

Storage procedures include:

- secure storage of cannabis materials in restricted-access areas
- proper labeling and identification of stored materials
- temperature-controlled storage when required
- separation of quarantined or rejected materials

Inventory is tracked through the facility’s electronic inventory control system.

9. Recordkeeping

Wasatch Extraction maintains records documenting all manufacturing, packaging, labeling, and holding operations.

Records maintained include:

- batch production records
- inventory tracking records
- laboratory testing documentation
- equipment maintenance and cleaning logs
- employee training records

Records are maintained in accordance with regulatory requirements and are available for inspection by regulatory authorities.

10. Complaint Handling and Product Recall

The facility maintains procedures for addressing product complaints and conducting product recalls when necessary.

These procedures include:

- documentation and investigation of product complaints
- identification of affected product batches
- notification of regulatory authorities when required
- retrieval and destruction of recalled products in accordance with the facility's recall plan

11. Sanitation Procedures

The facility maintains sanitation procedures designed to prevent contamination during manufacturing and packaging operations.

Sanitation procedures include:

- routine cleaning of production areas
- cleaning and sanitation of equipment and utensils

- proper waste disposal procedures
- employee hygiene requirements

These procedures ensure that products are manufactured under sanitary conditions.

Extraction Methods Used at the Facility

Wasatch Extraction utilizes multiple extraction methods to produce cannabis concentrates and finished products. These methods include ethanol extraction, hydrocarbon extraction (BHO), supercritical CO_2 extraction, and solventless extraction methods.

Ethanol Extraction

Ethanol extraction is used to extract cannabinoids and other compounds from cannabis plant material using chilled, food-grade ethanol.

Solvents and Chemicals Used

- Food-grade ethanol
- Dry ice (for temperature control when applicable)
- Filtration media (diatomaceous earth, cellulose, and carbon)

Equipment Used

- [redacted]

Process Summary

Cannabis biomass is saturated with chilled ethanol, which extracts cannabinoids and other compounds to form a tincture. The tincture is filtered to remove particulates and waxes, then processed through solvent recovery systems to reclaim ethanol. The resulting crude oil is further refined through distillation to produce purified cannabis oil (distillate).

Hydrocarbon Extraction (BHO)

Hydrocarbon extraction uses butane in a closed-loop system to produce high-quality cannabis concentrates.

Solvents and Chemicals Used

- Butane

Equipment Used

- [redacted]

Process Summary

Cannabis biomass is loaded into the extraction vessel, and butane is passed through the material under pressure to extract cannabinoids and terpenes. The resulting solution is collected, and the solvent is recovered. The remaining concentrate is further processed to create products such as shatter, wax, crumble, and diamonds.

CO_2 Extraction

Supercritical CO_2 extraction uses pressurized carbon dioxide to extract cannabinoids and other desirable compounds from cannabis biomass.

Solvents and Chemicals Used

- [redacted]

Equipment Used

- [redacted]

- [redacted]
- [redacted]
- [redacted]

Process Summary

Cannabis biomass is processed using pressurized CO_2 to produce a crude extract (“butter”). This extract is winterized using ethanol at sub-zero temperatures to remove waxes. The mixture is filtered, and ethanol is recovered using a rotary evaporator. The remaining crude oil is further refined through distillation to produce purified cannabis oil.

Solventless Extraction – Rosin Press

Rosin extraction is a solventless method that uses heat and pressure to extract cannabinoids directly from cannabis material.

Solvents and Chemicals Used

- None

Equipment Used

- PurePressure Longs Peak Rosin Press
- Mesh filter bags
- Collection tools

Process Summary

Cannabis material is placed into mesh bags and subjected to controlled heat and pressure. This process extracts cannabinoid-rich oil (rosin), which is collected and packaged as a solventless concentrate.

Solventless Extraction – Bubble Hash (Ice Water Extraction)

Bubble hash extraction uses ice water and agitation to separate trichomes from cannabis plant material.

Solvents and Chemicals Used

- Ice
- Water

Equipment Used

- Water bath extraction vessels
- Filtration bags (multi-micron screens)
- Agitation equipment
- Vacuum oven (for drying)

Process Summary

- Cannabis biomass is agitated in ice water to separate trichomes from plant material. The mixture is filtered through mesh bags to isolate the trichomes, which are then dried to produce bubble hash. This process is solventless and preserves cannabinoid and terpene profiles.**16) Is the Facility Doing CBD to**
- **TCH Conversion?**: No. Wasatch will not be converting hemp waste into medical THC but Wasatch would like to reserve the right to purchase such products through the proper channels and use them in accordance with the law.

Equipment List

The following equipment is installed and used at the Wasatch Extraction cannabis processing facility.

Extraction Equipment

- [redacted]

These systems are used for the extraction of cannabinoids and terpenes from cannabis plant material**.**

Solvent Recovery & Post-Processing Equipment

- [redacted]

These systems are used for solvent recovery, crude oil concentration, and temperature control during extraction operations.

Distillation Equipment

- [redacted]

This system is used for purification and distillation of cannabis oil to produce refined cannabinoid concentrates.

Filtration Equipment

- [redacted]

These filtration systems are used for clarification and purification of crude oil during post-processing.

Mixing & Processing Equipment

- [redacted]

This equipment is used for blending cannabis extracts with carrier oils and other ingredients during product formulation.

Laboratory Equipment

- [redacted]

These items are used for testing, measurement, and processing support.

Facility Equipment

- Forklift – used for material handling and movement of bulk materials.
- Secure Storage Safe – used for secure storage of cannabis materials and sensitive items.

Storage Equipment

- Lockable metal-lined walk-in freezer for cannabis raw material storage.

Master Product List

1. Vape Products

- **Cannabis Vape Cartridges**
  Pre-filled cartridges containing cannabis oil or distillate intended for use with compatible vaporization devices.
- **Cannabis Vape Pens**
  Disposable vaporization devices pre-filled with cannabis oil or distillate.

These products contain refined cannabis extracts and may include naturally derived cannabis terpenes or other approved ingredients.

---

2. Packaged Cannabis Concentrates

- **Cannabis Distillate**
- **Cannabis Concentrate Oil**
- **Other Refined Cannabis Extracts**

These products are packaged as finished concentrates for patient use or for transfer to other licensed cannabis establishments in accordance with state regulations.

---

3. Cannabis Tinctures

- **Alcohol-Based Cannabis Tinctures**
- **Oil-Based Cannabis Tinctures**

Tinctures are liquid cannabis products formulated with measured cannabinoid concentrations and intended for oral or sublingual use.

---

4. Cannabis Topical Products

- **Cannabis Salves**
- **Cannabis Balms**
- **Cannabis Creams**

- **Cannabis Topical Oils**

Topical products are formulated for external application and contain cannabis extracts combined with approved carrier ingredients.

Procedure for the Use of Cannabinoid Isolate

Compliance with Utah Administrative Rule R66-2-7(5)

1. Purpose

This procedure establishes the standards and controls governing the use of cannabinoid isolate at the Wasatch Extraction processing facility. These procedures ensure that cannabinoid isolates used in product formulation are properly sourced, tested, tracked, and incorporated into cannabis products in a manner that complies with Utah Administrative Rule R66-2-7(5) and applicable Utah cannabis regulations.

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2. Definition of Cannabinoid Isolate

For the purposes of this procedure, cannabinoid isolate refers to a purified cannabinoid compound that has been isolated from cannabis or hemp and processed into a crystalline or powdered form containing a high concentration of a single cannabinoid, such as CBD, CBG, or other minor cannabinoids.

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3. Approved Sources of Cannabinoid Isolate

Cannabinoid isolate used in the facility must be obtained from approved and lawful sources.

Acceptable sources include:

• licensed Utah cannabis production establishments
• licensed hemp processors operating in compliance with applicable state and federal regulations
• other legally authorized cannabinoid suppliers permitted under Utah law

All incoming cannabinoid isolate must be accompanied by appropriate documentation verifying its origin and compliance with applicable regulatory requirements.

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4. Laboratory Testing Requirements

Before cannabinoid isolate may be used in cannabis product formulation, it must be accompanied by laboratory testing documentation demonstrating compliance with Utah cannabis testing standards.

Testing documentation must include verification of:

• cannabinoid potency
• absence of harmful contaminants
• compliance with pesticide limits
• heavy metal testing
• microbial contamination testing
• residual solvent testing, if applicable

Testing must be performed by a licensed independent cannabis testing laboratory in accordance with Utah regulatory requirements.

Any cannabinoid isolate that fails required testing standards will not be used in production.

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5. Inventory Tracking and Identification

All cannabinoid isolate received and used by the facility will be tracked within the facility's electronic inventory control system.

Upon receipt of cannabinoid isolate:

• the material will be assigned a unique package or batch identifier
• the isolate will be logged within the inventory tracking system
• quantities received and stored will be documented

Wasatch Extraction currently utilizes MJ Freeway as its electronic inventory tracking system and will transition to the State-mandated Inventory Control System (ICS) as required by Utah regulations.

All cannabinoid isolate used in product manufacturing will remain fully traceable within the inventory system.

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6. Storage of Cannabinoid Isolate

Cannabinoid isolate will be stored in designated secure storage areas within the facility to preserve product integrity and prevent contamination.

Storage procedures include:

• storing isolate in sealed, clearly labeled containers
• maintaining appropriate environmental conditions to preserve stability
• restricting access to authorized facility agents
• maintaining separation from other materials to prevent cross-contamination

All stored isolate will remain identifiable within the inventory control system.

---

7. Use in Product Formulation

Cannabinoid isolate may be used in the formulation of cannabis products in accordance with Utah cannabis manufacturing regulations.

During product formulation:

• the quantity of isolate used will be recorded in the batch production record
• source package identifiers will be linked to the finished product batch
• formulation records will document the use of isolate and resulting cannabinoid concentrations

All resulting products must comply with applicable cannabinoid limits and labeling requirements under Utah law.

---

8. Recordkeeping

The facility will maintain records documenting the use of cannabinoid isolate, including:

• supplier documentation
• laboratory testing reports
• inventory tracking records
• batch production records
• product formulation documentation

These records will be maintained and made available to regulatory authorities upon request.

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9. Compliance Oversight

Wasatch Extraction will ensure that all cannabinoid isolate used in cannabis product manufacturing is handled in compliance with Utah Administrative Rule R66-2-7(5) and other applicable state cannabis regulations.

Facility personnel responsible for product formulation and inventory management will ensure that cannabinoid isolate is sourced, stored, tracked, and used in a manner consistent with state regulatory requirements.

Cannabis Product Sampling and Laboratory Testing Plan

1. Purpose

Wasatch Extraction maintains procedures to ensure that representative samples of cannabis products are tested by a licensed independent cannabis testing laboratory in accordance with applicable Utah cannabis regulations. These procedures ensure that all cannabis products produced at the facility are evaluated for safety, potency, and regulatory compliance prior to being released for distribution.

---

2. Batch Identification and Tracking

All cannabis products produced at the facility are assigned a unique batch identifier within the facility's electronic inventory tracking system.

Wasatch Extraction currently utilizes MJ Freeway as its electronic inventory tracking platform and will transition to the State-mandated Inventory Control System (ICS) in accordance with Utah regulatory requirements.

Batch records include:

- product type
- batch size and quantity produced
- production date
- source material
- unique batch or package identification numbers

These records ensure full traceability of all cannabis products produced by the facility.

---

3. Sampling Procedures

Sampling of cannabis products for laboratory testing is performed only by a state-authorized cannabis sampling technician.

When a batch of cannabis product is ready for testing:

1. Wasatch Extraction will notify the appropriate regulatory authority or authorized sampling service that the batch is ready for sampling.
2. A state-authorized sampling technician will visit the facility to collect a representative sample of the product.
3. The sampling technician will independently select the sample from the batch to ensure the sample accurately represents the production lot.
4. Wasatch Extraction personnel will provide access to the batch and assist the sampling technician as needed during the sampling process.

At no time will Wasatch Extraction employees collect samples for regulatory laboratory testing.

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4. Transport of Samples to the Testing Laboratory

After the sample has been selected by the authorized sampling technician:

- Wasatch Extraction will generate a transport manifest documenting the sample transfer.
- The manifest will include the batch identification number, product type, quantity of the sample, and the destination testing laboratory.
- The sampling technician will take possession of the sample and transport it to a licensed independent cannabis testing laboratory for analysis.

These procedures maintain proper chain-of-custody and regulatory compliance during the sampling and testing process.

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5. Laboratory Testing

The licensed independent testing laboratory will perform the required testing to determine whether the product meets regulatory safety standards.

Testing may include analysis for:

- cannabinoid potency
- pesticides
- residual solvents
- heavy metals
- microbial contamination
- mycotoxins
- other contaminants required by Utah regulations

---

6. Review of Test Results

Following completion of testing, the laboratory will issue a Certificate of Analysis (COA) documenting the test results.

Facility personnel will review the COA to verify that the product meets all applicable regulatory standards.

Products will not be released for transfer or distribution until the facility has received confirmation that the batch has passed all required testing.

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7. Failed Testing and Corrective Actions

If a cannabis product fails laboratory testing:

- the affected batch will be immediately quarantined
- the facility will evaluate whether remediation is possible
- remediation procedures will be submitted to the State for approval prior to implementation

If remediation is not possible, the batch will be destroyed in accordance with the facility's cannabis destruction procedures.

---

8. Recordkeeping

Wasatch Extraction maintains documentation related to product sampling and testing, including:

- batch records
- transport manifests
- chain-of-custody documentation
- laboratory Certificates of Analysis
- remediation or destruction records if applicable

These records are maintained and made available to regulatory authorities upon request.

Cannabis Product Remediation Plan

1. Purpose

Wasatch Extraction maintains a remediation plan to address situations where cannabis or cannabis products fail to meet applicable regulatory standards. The purpose of this plan is to ensure that any product requiring remediation is handled in a controlled, documented, and compliant manner in accordance with applicable Utah cannabis regulations.

Remediation refers to the process of correcting or reprocessing a cannabis product that has failed laboratory testing or otherwise does not meet regulatory requirements.

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2. Identification of Products Requiring Remediation

Products may be identified for remediation under the following circumstances:

- failure of required laboratory testing
- contamination concerns
- potency deviations outside allowable limits

- regulatory or quality control concerns identified during production or packaging

When a product is identified as potentially requiring remediation, the affected batch or package will be immediately isolated and placed in a designated quarantine area within the facility.

---

3. Remediation Evaluation

Wasatch Extraction will evaluate the cause of the product failure and determine whether remediation is possible and appropriate.

Potential remediation options may include:

- additional filtration or purification processes
- re-distillation of cannabis oil or concentrates
- dilution or reformulation of products to meet potency requirements
- reprocessing through extraction or refinement equipment

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4. State Notification and Approval

Prior to performing any remediation activity, Wasatch Extraction will notify the appropriate regulatory authority and present the proposed remediation method for approval.

The facility will not begin remediation activities until approval has been received from the State.

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5. Remediation Procedures

Once approval is received, the remediation process will be conducted according to the approved remediation plan.

During remediation:

- the affected product will remain tracked within the facility's electronic inventory tracking system
- the remediation process will be documented in batch records
- the product will remain segregated from other inventory until remediation is complete

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6. Retesting Requirements

After remediation has been completed, the product will be submitted to a licensed cannabis testing laboratory for retesting as required by applicable regulations.

The product will not be released for transfer or sale until it has successfully passed all required laboratory tests.

---

7. Documentation and Recordkeeping

Wasatch Extraction will maintain records of all remediation activities, including:

- identification of the affected batch or product
- cause of the remediation event
- proposed remediation method
- state approval documentation
- remediation process records
- laboratory retesting results

These records will be maintained and made available to regulatory authorities upon request.

Product Recall Plan

Compliance with Utah Administrative Rule R66-2-15

1. Purpose

Wasatch Extraction maintains a written product recall plan to ensure that any cannabis product that poses a potential risk to consumers can be rapidly identified, isolated, and removed from distribution. This recall plan is designed to comply with Utah Administrative Rule R66-2-15 and other applicable Utah cannabis regulations.

The facility maintains detailed batch records and inventory tracking through the electronic inventory tracking system, allowing for rapid identification and traceability of all cannabis products produced by the facility.

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2. Recall Coordinator

The Recall Coordinator is responsible for overseeing and managing any product recall initiated by Wasatch Extraction.

Recall Coordinator:

[redacted]

Contact Information:
[redacted]

The Recall Coordinator is responsible for coordinating all recall activities, communicating with regulatory authorities, and ensuring that all recall procedures are carried out in accordance with state regulations.

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3. Notification of Affected Parties

If a product recall is initiated, Wasatch Extraction will promptly notify all affected parties that may have received the affected product.

Affected parties may include:

- medical cannabis pharmacies
- cannabis production establishments
- licensed testing laboratories
- distributors or other licensed cannabis establishments

Notifications may be issued through:

- telephone calls
- email notification
- written notice
- hand-delivered communication
- in-person communication if necessary

Recipients will be instructed to immediately cease distribution and use of the affected product until further instructions are provided.

If necessary and in coordination with the Department, public notifications or press releases may be issued to inform consumers of the recall.

---

4. Product Recall Procedures

If Wasatch Extraction initiates a recall due to a condition that poses a potential risk to consumers, the Recall Coordinator will take the following steps:

Step 1 – Identification of Affected Product

The facility will identify the affected product using batch numbers, package identifiers, and inventory records within the electronic tracking system.

Step 2 – Isolation of Product

All affected products within the possession of Wasatch Extraction will be immediately secured and isolated to prevent further distribution.

Step 3 – Notification of the Department

The Utah Department of Agriculture and Food will be notified that Wasatch Extraction intends to initiate a voluntary recall.

Step 4 – Identification of Distribution Chain

The facility will identify all dispensaries, laboratories, or other licensed establishments that may have received the affected product.

Step 5 – Stop-Use Notice

A stop-use notification will be issued to all affected recipients instructing them to immediately stop distribution and use of the affected product.

Step 6 – Product Retrieval

Wasatch Extraction will retrieve all affected product from identified recipients as soon as practicable in a manner that complies with Utah cannabis transportation and transfer regulations.

Step 7 – Consumer Notification (If Required)

If appropriate, and in coordination with the Department's enforcement officer, Wasatch Extraction may issue public notices or press releases to ensure consumers are aware of the recall.

Step 8 – Evaluation of Affected Product

In coordination with the Department, Wasatch Extraction will determine whether the affected product may be remediated or must be destroyed.

Step 9 – Product Destruction

If the affected product cannot be remediated, it will be destroyed in accordance with the facility's cannabis waste disposal procedures and under the oversight of the Department if required.

Step 10 – Recall Tracking and Reporting

The facility will track the total amount of affected product and the amount returned during the recall process.

Progress reports will be provided to the Department weekly or more frequently if requested.

Step 11 – Recall Closure

Wasatch Extraction will cooperate fully with the Department to complete all recall procedures and obtain a recommendation of recall closure once the Department determines the recall has been properly completed.

---

5. Recordkeeping

All records related to product recalls will be maintained by Wasatch Extraction and made available to regulatory authorities upon request. These records will include:

- recall communications
- distribution records
- quantities of product recovered
- destruction documentation
- final recall reports

Destruction Plan for Failed Cannabis Products

Compliance with Utah Code §4-41a-405 and Administrative Rule R66-2-17

1. Purpose

Wasatch Extraction maintains procedures for the proper destruction and disposal of cannabis products that fail quality assurance testing or otherwise cannot be remediated. These procedures ensure that all cannabis waste is rendered unusable and unrecognizable prior to disposal and that all destruction activities comply with federal law, Utah Code §4-41a-405, and Administrative Rule R66-2-17.

Any cannabis product that fails required laboratory testing and cannot be remediated will be destroyed according to the procedures outlined below.

---

2. Identification and Quarantine of Failed Products

When a cannabis product fails quality assurance testing or is determined to be unsuitable for release:

• the affected batch or package will be immediately identified and isolated
• the product will be placed in a designated quarantine area within the facility
• the product will remain segregated from other inventory until destruction occurs

The product will remain tracked within the facility's electronic inventory tracking system.

Wasatch Extraction currently utilizes MJ Freeway for inventory tracking and will transition to the State-mandated Inventory Control System (ICS) as required by Utah regulations.

3. General Cannabis Waste Destruction Procedures

Cannabis waste will be rendered unusable and unrecognizable prior to disposal.

This will be accomplished by mixing cannabis waste with non-cannabis materials such as:

- dirt
- sawdust
- sand
- cat litter
- clay
- bleach
- other approved inert materials

The cannabis portion of the mixture will not exceed 49% of the total mixture, ensuring that the cannabis waste cannot be consumed or diverted.

All waste disposal will comply with state and local waste management regulations.

4. Product-Specific Destruction Procedures

Vape Cartridge Disposal

Failed vape cartridges will be destroyed using the following procedure:

• cartridges will be physically crushed to break the glass or hardware
• the oil contents will be contaminated with inert materials such as dirt, cat litter, or sawdust
• the resulting mixture will be rendered unusable and unrecognizable prior to disposal

Packaged Cannabis Concentrate Disposal

Concentrate products such as distillate or other refined extracts will be:

• placed into a disposal container
• mixed with dirt, cat litter, sawdust, bleach, or other inert materials
• rendered unusable prior to disposal

Cannabis Tincture Disposal

Tincture products will be:

• poured into a disposal container
• mixed with dirt, cat litter, sawdust, bleach, or other inert materials
• rendered unusable and unrecognizable before disposal

Cannabis Topical Product Disposal

Topical products such as salves, balms, creams, or oils will be:

• placed into a disposal container
• mixed with dirt, cat litter, sawdust, bleach, or other inert materials
• rendered unusable and unrecognizable prior to disposal

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5. Solvent and Processing Waste Disposal

Extraction solvents such as ethanol that are no longer usable will be:

• stored in sealed containers
• rendered unusable using bleach or other approved methods
• transported to an approved hazardous waste disposal facility such as the Salt Lake Valley Landfill Hazardous Waste Facility

Laboratory waste generated during distillation or processing will be treated in a similar manner and disposed of in compliance with hazardous waste regulations.

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6. Documentation and Tracking

All destruction events will be recorded within the facility's electronic inventory tracking system.

Documentation will include:

• product batch or package identification number
• quantity of product destroyed
• date and time of destruction
• method of destruction
• personnel responsible for destruction

Records of all destruction activities will be maintained and made available to regulatory authorities upon request.

7. Final Disposal

Once cannabis waste has been rendered unusable and unrecognizable, the waste may be disposed of through standard waste disposal channels in accordance with applicable state and local waste regulations.

Cannabis Waste Disposal Plan

Compliance with Utah Code §4-41a-405 and Applicable Utah Administrative Rules

1. Purpose

The purpose of this waste disposal plan is to establish procedures for the proper handling, destruction, and disposal of cannabis waste generated at the Wasatch Extraction processing facility. These procedures ensure that all cannabis waste is rendered unusable and unrecognizable prior to disposal and that all waste disposal activities comply with Utah Code §4-41a-405 and applicable Utah Administrative Rules governing cannabis waste disposal.

All cannabis waste generated at the facility will be documented, tracked within the facility's inventory control system, and disposed of in accordance with state and local waste management regulations.

2. General Waste Disposal Procedures

Cannabis waste generated during processing, packaging, testing, or product destruction will be rendered unusable and unrecognizable prior to disposal.

This will be accomplished by mixing cannabis waste with non-cannabis materials such as:

- dirt
- sawdust
- sand
- clay
- cat litter
- bleach
- other approved inert materials

The cannabis portion of the mixture will not exceed 49% of the total mixture, ensuring the material is unusable and unrecognizable.

All cannabis waste will be handled in accordance with state and local waste disposal regulations.

3. Biomass and Plant Material Waste

Cannabis biomass or plant material waste generated during processing will be:

• ground or otherwise broken down
• mixed with dirt, sawdust, sand, clay, or other inert materials
• rendered unusable and unrecognizable
• disposed of in accordance with applicable waste disposal regulations

The cannabis portion of the resulting mixture will not exceed 49% of the total mixture.

---

4. Disposal of Finished Cannabis Products

Cannabis products that require disposal due to expiration, contamination, product defects, or regulatory requirements will be destroyed using the following procedures.

Cartridge Disposal

Cannabis cartridges requiring disposal will be:

• physically crushed to contaminate the product
• mixed with dirt, cat litter, sawdust, or similar materials
• rendered unusable prior to disposal

Tincture, Oil, Salve, and Balm Disposal

Liquid cannabis products will be:

• poured into a container
• mixed with dirt, cat litter, sawdust, bleach, or other materials
• rendered unusable and unrecognizable prior to disposal

Pill Disposal

Cannabis pills requiring disposal will be:

• crushed
• mixed with dirt, cat litter, sawdust, bleach, or other materials
• disposed of once rendered unusable

Concentrate Disposal

Cannabis concentrates such as shatter, diamonds, crumble, or similar products will be:

• mixed with dirt, cat litter, sawdust, bleach, or other inert materials
• rendered unusable and unrecognizable prior to disposal

Gummy Disposal

Cannabis gummies requiring disposal will be:

• placed in a container
• saturated with bleach
• mixed with dirt, cat litter, sawdust, or other inert materials
• disposed of once rendered unusable

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5. Wastewater Management

Wasatch Extraction does not produce wastewater as a byproduct of cannabis extraction. The extraction methods currently used at the facility do not generate water-based waste streams.

The only wastewater generated onsite results from standard restroom usage and dishwashing activities.

Processing tools and glassware are first cleaned in ethanol baths prior to washing. These ethanol baths are handled through the facility's solvent disposal procedures.

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6. Solvent Disposal

Solvents used in the extraction process, primarily ethanol, may be reused multiple times before they lose their extraction effectiveness.

When ethanol is no longer usable:

• it will be stored in sealed 5-gallon containers
• bleach will be mixed with the ethanol to render it unusable
• the mixture will be transported to the Salt Lake Valley Landfill Hazardous Waste Facility for proper disposal

All solvent disposal will comply with state and local hazardous waste regulations.

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7. Laboratory Waste Disposal

Laboratory waste generated during distillation and purification processes, including short-path distillation heads and tails, will be handled as follows:

• waste material will be collected in sealed containers
• the waste will be rendered unusable by mixing with bleach

• the destruction process will be documented and recorded under video surveillance
• the facility will notify the State prior to transport if required

Once authorization is obtained, the waste will be transported to the Salt Lake Valley Landfill Hazardous Waste facility for proper disposal.

---

8. Waste Tracking and Documentation

All cannabis waste generated at the facility will be documented and tracked within the facility's electronic inventory tracking system.

Wasatch Extraction currently utilizes MJ Freeway as its electronic inventory tracking system and will transition to the State-mandated Inventory Control System (ICS) in accordance with Utah regulatory requirements.

Each waste disposal event will include documentation of:

• source package or batch identifier
• quantity of material destroyed
• method of destruction
• date and time of disposal
• personnel responsible for the destruction

Inventory Control System (ICS)

Compliance with Utah Code §4-41a-103 and Applicable Utah Administrative Rules

Inventory Control System (ICS)

The processing establishment will maintain a comprehensive Inventory Control System (ICS) designed to ensure accurate tracking, accountability, and regulatory compliance for all cannabis and cannabis products handled by the facility. The ICS will maintain complete traceability of cannabis inventory from the time cannabis material is received from a licensed Utah cannabis cultivator through processing, storage, transfer, and final disposition.

Because the facility operates as a **cannabis processing establishment**, it does not cultivate cannabis plants. Instead, the facility receives cannabis material, including trim and other cannabis plant material, from licensed Utah cannabis cultivation facilities and converts that material into intermediate extracts and finished cannabis products.

The inventory control system will track all cannabis inventory in real time and maintain detailed records for all inventory movements, including receipt, processing, packaging, transfer, adjustment, and disposal.

Electronic Inventory Tracking Platform

The facility currently utilizes **MJ Freeway** as its electronic inventory tracking platform to record inventory transactions and maintain compliance with Utah cannabis tracking requirements. MJ Freeway is used to track incoming cannabis material, batch creation, processing activities, product formulation, packaging, inventory reconciliation, transfers, and waste destruction.

The facility will transition to the **State-mandated Inventory Control System (ICS)** as required by Utah regulatory authorities. The ICS system will serve as the primary inventory tracking platform and will maintain compliance with **Utah Code §4-41a-103** and all applicable Utah Administrative Rules related to cannabis inventory tracking and traceability.

The transition from MJ Freeway to the State ICS system will be conducted in a manner that ensures uninterrupted compliance, continuous traceability of all cannabis material, and accurate reporting of all inventory transactions.

Receipt and Verification of Cannabis Material

The facility will receive cannabis material only from **licensed Utah cannabis cultivation facilities or other authorized cannabis production establishments**.

Upon receipt of cannabis material, the facility will perform the following procedures:

1. Verify the transfer manifest and shipping documentation.
2. Confirm package identifiers within the electronic inventory system.
3. Inspect and weigh incoming material to verify quantities.
4. Record the receipt of inventory within the electronic tracking system.

Receipt records will include:

• supplier license information
• package identification numbers
• product type and description
• weight or quantity received
• date and time of receipt
• employee responsible for receiving the shipment

Any discrepancies identified during receipt will be documented and reported according to facility procedures.

Inventory Identification and Traceability

All cannabis material received by the facility will retain its **unique package identifier** assigned within the state electronic tracking system. The inventory control system will maintain traceability for all cannabis material handled by the facility, including:

• incoming cannabis plant material
• intermediate extraction material
• cannabis oils and concentrates
• distilled cannabis products
• finished cannabis products
• cannabis waste

When cannabis material is transformed during processing, the system will generate new batch or package identifiers while maintaining traceability to the original source package.

This system ensures full chain-of-custody documentation for all cannabis inventory handled by the facility.

Processing and Batch Tracking

All cannabis processing activities will be recorded within the inventory tracking system. Processing activities may include extraction, filtration, distillation, formulation of finished products, and packaging.

Each processing batch will include records documenting:

• source package identifiers
• batch or lot numbers
• processing methods
• quantities of material used
• quantities of material produced
• date and time of processing
• personnel responsible for the process

These records ensure that all cannabis material can be traced from the originating package through all stages of processing to the finished product.

Inventory Reconciliation and Auditing

The facility will maintain accurate real-time inventory records and will perform routine inventory reconciliation to ensure accuracy and compliance.

Inventory verification procedures include:

Daily

• review of electronic inventory transactions and system entries

Weekly

• physical verification of cannabis material stored within the facility

Monthly

• comprehensive reconciliation comparing physical inventory to electronic system records

Any discrepancies will be promptly investigated and documented.

Storage and Inventory Security

All cannabis inventory will be stored within designated secure areas of the facility. Inventory will be organized and segregated based on processing stage and inventory status, including:

• incoming cannabis material
• work-in-progress processing material
• quarantined inventory awaiting testing
• finished cannabis products
• cannabis waste awaiting destruction

Access to inventory storage areas will be restricted to authorized facility agents.

Transfers and Transport

All transfers of cannabis or cannabis products from the facility will be recorded within the electronic inventory tracking system and accompanied by a transfer manifest.

Cannabis products may only be transferred to licensed Utah cannabis establishments in accordance with Utah regulations.

Transfer documentation will include:

• destination license information
• package identifiers
• product description and quantities
• transfer date and time
• transport information

Waste Tracking and Destruction

Cannabis waste generated during processing will be tracked within the inventory control system. Waste material will be rendered **unusable and unrecognizable** prior to disposal.

Waste destruction records will include:

• originating package identifier
• quantity destroyed
• date and time of destruction
• destruction method
• personnel responsible

Electronic Verification System and Facility Agent Compliance

Compliance with Utah Code §4-41a-201

The facility will comply with **Utah Code §4-41a-201** by ensuring that all employees who handle cannabis are registered as **facility agents** and possess valid state-issued agent identification.

The facility will utilize the **State Electronic Verification System** to verify the status of all facility agents prior to allowing access to cannabis or restricted areas of the facility.

Procedures include:

• verifying agent registration prior to employment
• confirming active agent status through the state verification system
• ensuring agents display state-issued identification badges while working
• restricting access to cannabis handling areas to authorized facility agents only
• maintaining internal records of all authorized agents

Facility access controls ensure that only verified and authorized agents may handle cannabis inventory or enter restricted processing and storage areas.

Surveillance and Recordkeeping

The facility's inventory control procedures are supported by a comprehensive video surveillance system that monitors cannabis handling areas, storage rooms, and processing areas.

The surveillance system:

• operates continuously
• is tamper-resistant
• records activities related to inventory handling
• maintains recordings for a minimum of **45 days**

Inventory records, processing documentation, transfer manifests, and destruction records will be securely maintained and made available to regulatory authorities upon request.

Research & Development Plan

Compliance with Utah Code Title 4-41a and Applicable Utah Administrative Rules

1. Purpose

The purpose of the Research and Development (R&D) program is to allow the facility to evaluate and improve cannabis processing techniques, product formulations, and operational efficiencies while maintaining full compliance with Utah cannabis regulations.

The R&D program allows the facility to develop and refine cannabis processing methods and product formulations prior to commercial production. All research and development activities will be conducted in a controlled environment, documented within the facility's inventory control system, and performed in accordance with Utah Code Title 4-41a and applicable Utah Administrative Rules governing cannabis production establishments.

All cannabis material used for research and development will remain fully traceable within the facility's inventory control system.

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2. Scope of Research and Development Activities

The facility may conduct research and development activities related to cannabis processing and product formulation, including but not limited to:

- evaluation of cannabis extraction methods
- optimization of extraction yields and efficiencies
- refinement of purification and distillation processes
- development of new cannabis product formulations
- evaluation of ingredient compatibility and stability
- testing of product packaging and shelf-life performance
- evaluation of cannabinoid and terpene profiles

All R&D activities will be limited to improving processing methods and product development and will not involve unauthorized experimentation or activities prohibited under Utah law.

---

3. Inventory Tracking of R&D Material

All cannabis material used for research and development will be tracked within the facility's Inventory Control System (ICS) in the same manner as commercial inventory.

Cannabis material designated for research and development will:

- be assigned a unique batch or package identifier
- remain traceable to the originating cannabis material

• be recorded within the electronic inventory tracking system
• be documented when transferred into R&D activities

All inventory movements associated with R&D activities will be recorded in real time within the electronic inventory system.

The facility currently utilizes MJ Freeway as its electronic inventory tracking system and will transition to the State-mandated Inventory Control System (ICS) in accordance with Utah regulatory requirements. All R&D inventory will be tracked within the applicable electronic system to ensure full traceability.

---

4. Documentation of R&D Activities

All research and development activities will be documented to ensure transparency, traceability, and regulatory compliance.

Documentation will include:

• R&D project description
• materials used
• source package identifiers
• quantities used for testing
• methods and procedures used
• results and observations
• disposition of resulting material

All R&D documentation will be maintained as part of the facility's operational records and made available to regulatory authorities upon request.

---

5. Segregation of R&D Materials

Cannabis materials used for research and development will be clearly identified and segregated from commercial production materials.

R&D materials will be stored in designated areas within the facility and labeled to indicate their research status. This segregation ensures that experimental materials are not inadvertently transferred into commercial distribution channels without appropriate regulatory review and testing.

Access to R&D areas will be restricted to authorized facility agents.

---

6. Testing Requirements

Any cannabis products developed through research and development that are intended for commercial distribution must meet all Utah cannabis testing requirements prior to release.

Products developed through R&D will be submitted to a licensed independent cannabis testing laboratory for required testing prior to commercial production or distribution.

Testing may include:

• cannabinoid potency
• microbial contamination
• pesticide residue
• heavy metals
• solvent residue
• other state-required analyses

Products that do not meet regulatory standards will not be released for sale.

---

7. Disposition of R&D Materials

Cannabis material generated through research and development activities will be handled in one of the following ways:

• transferred into commercial production after meeting regulatory requirements
• retained for additional testing and evaluation
• rendered unusable and destroyed in accordance with waste disposal procedures

All disposition actions will be recorded within the facility's inventory control system.

---

8. Security and Access Control

All research and development activities will occur within secured areas of the facility that are monitored by the facility's surveillance system.

The surveillance system will:

• monitor R&D areas continuously
• maintain recordings for at least 45 days
• provide documentation of cannabis handling activities

Access to R&D areas will be restricted to authorized facility agents who have been verified through the State Electronic Verification System in accordance with Utah Code §4-41a-201.

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9. Regulatory Compliance and Oversight

The facility will conduct all research and development activities in full compliance with Utah cannabis laws and regulations. The facility will maintain all R&D documentation and inventory records and will make such records available to authorized regulatory agencies upon request.

Research and development activities will not circumvent testing, inventory tracking, or other regulatory safeguards established by Utah law.

Cannabis Storage Protocols

Compliance with Utah Code Title 4-41a and Applicable Utah Administrative Rules

1. General Storage Protocols

All cannabis products and materials stored at the facility will be maintained in a secure, sanitary environment designed to protect product integrity and prevent contamination, diversion, or degradation.

Storage areas will:

• be maintained in a clean and orderly condition
• be free from infestation by insects, rodents, birds, or other vermin
• be located within secured areas accessible only to authorized facility agents
• be monitored by the facility's surveillance system

As a cannabis processing facility, Wasatch Extraction will:

• track and label each cannabis product and cannabis concentrate within the electronic inventory tracking system
• ensure unfinished products are stored in a secure location when not actively being processed
• return all cannabis material to a secure storage area immediately after completion of a process or at the end of the scheduled business day

If a manufacturing process cannot be completed at the end of a working day, the processing area or any tanks, vessels, bins, or bulk containers containing cannabis will be securely locked within a restricted-access room or area that provides adequate security.

All cannabis inventory will be tracked within the electronic inventory system. The facility currently utilizes MJ Freeway as its compliant inventory management platform and will transition to the State-mandated Inventory Control System (ICS) in accordance with Utah regulatory requirements.

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2. Cannabis Raw Product Storage

Raw cannabis material received from licensed cannabis cultivation facilities will be stored in a secure manner until it is ready for processing.

Raw material will be stored either:

• in a lockable metal-lined walk-in freezer, or
• in the designated cannabis storage room located behind locked doors

All raw material stored at the facility will be labeled and tracked within the electronic inventory system and will be accompanied by a Solo tag or other compliant identification tag.

---

3. Cannabis Oil and In-Process Material Storage

Concentrates and bulk products awaiting packaging or further processing will be stored in the designated cannabis storage room behind a solid, lockable door.

All in-process materials will:

• remain properly labeled
• maintain traceability through the inventory tracking system
• be accompanied by a Solo tag or other compliant identification tag

---

4. Final Product Storage

Finished and packaged cannabis products will be stored within the designated cannabis storage room until transferred to another licensed cannabis establishment.

Final products will:

• remain labeled with their corresponding batch or package identifier
• be tracked within the inventory tracking system
• be accompanied by a Solo tag or other compliant identification tag

---

5. CBD and Minor Cannabinoid Product Storage

CBD and other minor cannabinoid concentrates will be stored within the designated CBD storage room unless they are entered into the state medical cannabis inventory system.

Once these materials are entered into the medical cannabis system, they will be transferred to Storage Room 1 and stored alongside THC concentrates in accordance with state inventory tracking requirements.

Emergency Procedures

Wasatch Extraction maintains written emergency procedures to protect employees, visitors, and the facility in the event of fire, chemical spills, earthquakes, or other emergencies. These procedures are designed to ensure a prompt and coordinated response to emergency situations.

Material Safety Data Sheets (MSDS), also referred to as Safety Data Sheets (SDS), for all chemicals used within the facility are maintained onsite and are easily accessible to all employees. SDS documents are located in the laboratory and in designated safety binders within the facility. Employees are trained on how to access and reference these documents.

All employees will receive training on emergency response procedures and evacuation protocols.

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1. Fire Emergency Procedures

In the event of a fire, employees will take the following actions:

1. Immediately notify other employees in the area.
2. Call 911 and report the fire emergency.
3. Determine whether the fire is small and contained enough to be safely addressed with a fire extinguisher.

If the fire is small and manageable:

• employees may attempt to extinguish the fire using an appropriate fire extinguisher
• employees should maintain a clear exit path while attempting to control the fire

If the fire cannot be quickly contained or if there is danger to employees:

• employees will immediately evacuate the facility using the nearest exit
• employees will not attempt to fight a fire that cannot be safely controlled with a fire extinguisher

Under no circumstances should employees attempt to fight a fire that presents a significant risk to personal safety.

Once outside the building, employees will gather at the designated assembly area and wait for emergency responders.

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2. Chemical Spill Procedures

Chemical spills may occur during the handling of solvents or other materials used in processing.

If a chemical spill occurs, employees will take the following steps:

1. Assess the size and severity of the spill.
2. Review the appropriate Safety Data Sheet (SDS) for the chemical involved.
3. Determine whether the spill can be safely contained and cleaned by facility personnel.

For small spills that present minimal risk:

• employees may clean the spill using appropriate personal protective equipment (PPE) such as gloves and protective cloths or absorbent materials
• contaminated materials will be disposed of according to facility waste disposal procedures

For larger spills or spills involving hazardous materials:

• employees will evacuate the immediate area
• the spill will be contained if it can be done safely
• emergency services will be contacted if necessary

All spills will be documented and reported to facility management.

---

3. Earthquake Procedures

In the event of an earthquake, employees will follow the Drop, Cover, and Hold On safety method.

Employees should:

• move away from windows, glass objects, and equipment that may tip over
• take shelter under sturdy tables or work surfaces
• remain inside until the shaking stops unless they are near a safe exterior exit

Employees working in laboratory or packaging areas may take shelter under the steel worktables located throughout the facility.

After the earthquake has stopped:

• employees will exit the building in an orderly manner
• employees will gather at the designated assembly area outside the facility
• employees will remain outside until the building has been inspected and it is safe to re-enter

---

4. Solvent or Gas Leak Procedures

If a solvent vapor release or gas leak is suspected:

• employees will immediately cease operations in the affected area
• ignition sources will be avoided
• employees will evacuate the area if necessary
• management or emergency responders will be notified

If the leak poses a significant safety hazard, employees will evacuate the facility and contact emergency services.

5. Medical Emergencies

In the event of a medical emergency:

• employees will immediately call 911
• trained personnel may administer basic first aid if it is safe to do so
• employees will remain with the affected individual until emergency responders arrive

Incident details will be documented following the emergency.

6. Power Failure

If a power outage occurs:

• employees will safely stop any ongoing processing activities
• all equipment will be shut down according to facility safety procedures
• emergency lighting will allow employees to exit the facility safely if necessary

Processing operations will not resume until power has been safely restored.

7. Emergency Contact and Training

Emergency contact numbers are posted within the facility and include:

• Fire Department / Emergency Services – 911
• Facility Management Contacts
• Local Hazardous Materials Response

All employees will receive training on:

• fire extinguisher use
• evacuation procedures
• chemical spill response
• emergency reporting procedures

Emergency procedures will be reviewed periodically to ensure employees remain familiar with proper response protocols.

8. Safety Data Sheet (SDS) Accessibility

Safety Data Sheets (SDS) for all chemicals used within the facility are maintained in clearly labeled binders and are accessible to all employees during working hours.

These documents include safety information related to:

• ethanol and other solvents
• cleaning chemicals
• laboratory chemicals used in processing

Employees are trained on how to locate and reference SDS documents as part of the facility's safety training program.

Security Plan

Compliance with Utah Cannabis Security Requirements

Wasatch Extraction maintains a comprehensive security program designed to prevent unauthorized access, theft, or diversion of cannabis products and to ensure compliance with Utah cannabis regulations.

A) Security Alarm System

The Wasatch Extraction facility is protected by a professionally monitored security alarm system provided by Clover Security.

The system includes:

- Door contact sensors on all exterior doors
- Glass break sensors installed in all rooms containing windows
- Motion detection sensors located throughout the facility
- Integrated camera monitoring

The system is monitored continuously and provides immediate alerts in the event of unauthorized entry or suspicious activity.

B) Persons Notified of Potential Security Breaches

If a security breach or alarm event occurs, the following individuals are immediately notified through the alarm monitoring system and associated mobile application:

Primary Contact:

[redacted]

Secondary Contact:
[redacted]

In addition to mobile alerts, the alarm monitoring operator will also contact [redacted] directly by phone to verify the emergency and determine whether police dispatch is required.

C) Video Surveillance System and Storage

The Wasatch Extraction facility utilizes a comprehensive video surveillance system designed to monitor all critical areas of the facility.

The system includes:

- [redacted]
-
-

All cameras meet or exceed the video resolution requirements established by the State of Utah.

Video recordings are stored on a local hard drive system located on the second floor within the facility utility room. This room is secured by lockable steel doors and access is restricted.

The video storage system retains a minimum of 45 consecutive days of uninterrupted video footage.

D) Access to Video Footage for UDAF Inspectors

Wasatch Extraction maintains procedures to provide regulatory authorities with immediate access to both current and archived video footage.

Authorized personnel can access the video system through the facility office computer and retrieve or export footage upon request.

These procedures ensure that inspectors can obtain video footage promptly during inspections or investigations.

E) Additional Security Measures

Wasatch Extraction maintains several additional security measures designed to exceed baseline security requirements, including:

- Continuous video monitoring of production and storage areas

- Secure storage rooms for cannabis materials with restricted access
- Inventory tracking through the electronic tracking system
- Visitor identification badges
- Controlled access to sensitive areas of the facility
- Alarm monitoring with immediate notification of security personnel

These measures help prevent unauthorized access and ensure accountability for all cannabis materials within the facility.

F) Visitor Policy

Visitors to the Wasatch Extraction facility must follow strict security procedures.

Visitor procedures include:

- All visitors must sign into the facility visitor log upon arrival.
- The visitor log records:
    - Visitor name
    - Time of arrival
    - Purpose of visit
    - Time of departure
    - Assigned visitor badge number

Visitors are issued a visitor badge, which must be worn visibly while on the premises.

Visitors must remain escorted by a licensed facility agent at all times and must remain within view of an employee while inside the facility.

Visitor logs are maintained for a minimum of one year and are available for review by UDAF inspectors upon request.

G) Backup Power and Power Outage Procedures

Wasatch Extraction maintains procedures to ensure facility security systems remain operational during power outages.

In the event of a power outage:

- Security system battery backups will maintain operation of the alarm system and surveillance equipment for a limited period.
- If power loss persists, facility personnel will secure all cannabis materials in designated secure storage areas.
- Access points will remain locked and secured until power is restored.

Once power is restored, facility personnel will verify that all surveillance and alarm systems have resumed normal operation.

If any system disruption occurred during the outage, facility management will review security logs and camera recordings to confirm that no unauthorized activity occurred.

Cannabis Transport and Transfer Plan

Wasatch Extraction – Cannabis Processing Establishment

Compliance with Utah Code §4-41a-404 and Applicable Utah Administrative Rules

1. Purpose

This transportation and transfer plan establishes the procedures Wasatch Extraction will follow when transporting or receiving medical cannabis or cannabis products. These procedures are designed to ensure the secure transport of cannabis materials while maintaining full compliance with Utah Code §4-41a-404 (Medical Cannabis Transportation) and applicable Utah Administrative Rules governing cannabis production establishments.

All cannabis transported by Wasatch Extraction will remain fully traceable within the facility's electronic inventory tracking system.

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2. Transport Manifest Requirements

A printed transport manifest will accompany every transport of cannabis or cannabis products.

The transport manifest will contain the following information:

a) the cannabis production establishment name, address, and license number of the departure location
b) the name, physical address, and license number of the receiving location
c) strain name or product description, quantities by weight or unit count, and unique identification numbers of each cannabis material being transported
d) the date and time of departure
e) the estimated date and time of arrival
f) the printed name and signature of each authorized facility agent accompanying the cannabis

The transport manifest may not be voided or altered once the transporting vehicle has departed from the originating cannabis production establishment.

A copy of the transport manifest will be provided to the receiving cannabis production establishment or medical cannabis pharmacy upon delivery.

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3. Transport Procedures

During transportation, cannabis products will be transported in accordance with Utah law and the following security procedures:

• cannabis materials will be shielded from public view
• cannabis will be stored in secure containers within the vehicle
• cannabis will remain under the control of authorized facility agents at all times
• perishable products will be transported under temperature-controlled conditions if required

Only registered facility agents employed by Wasatch Extraction may accompany cannabis during transport.

Agents transporting cannabis products must:

• possess a valid driver's license
• operate a vehicle with current registration and insurance
• carry their state-issued facility agent identification

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4. Transport Security

Cannabis transported by Wasatch Extraction will be secured within the transporting vehicle in a manner that prevents diversion or unauthorized access.

Security procedures include:

• transporting cannabis in closed containers or locked storage compartments
• maintaining continuous custody of the cannabis during transport
• ensuring cannabis is not accessible to unauthorized individuals

Vehicles transporting cannabis will not display markings that identify the vehicle as transporting cannabis.

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5. Receiving Cannabis Materials

Upon receipt of cannabis materials, Wasatch Extraction will verify that the shipment matches the information contained within the transport manifest.

Receiving procedures include:

• confirming the identity of the delivering establishment
• verifying the transport manifest information
• inspecting package identifiers and quantities
• recording the quantities received within the electronic inventory tracking system

If any discrepancies are identified between the transport manifest and the delivered materials, the facility will document the differences within the inventory tracking system and report the discrepancy as required.

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6. Accident or Loss Reporting

If a vehicle transporting cannabis is involved in an accident that results in the loss, theft, or diversion of cannabis products, Wasatch Extraction will notify the Utah Department of Agriculture and Food within 24 hours of the incident.

Documentation of the incident will be maintained in facility records.

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7. Inventory Tracking of Transported Cannabis

All transported cannabis products will be tracked within the facility's electronic inventory tracking system.

Wasatch Extraction currently utilizes MJ Freeway as its electronic inventory tracking platform and will transition to the State-mandated Inventory Control System (ICS) in accordance with Utah regulatory requirements.

All transfers, shipments, and receipts of cannabis products will be recorded within the applicable system to ensure complete traceability of inventory.

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8. Transport Vehicles

Wasatch Extraction utilizes the following vehicles for the transport of cannabis products between licensed establishments:

- [redacted]

All vehicles used for cannabis transportation are maintained in proper working condition and operated only by authorized facility agents.

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9. Chain of Custody

At all times during transportation, cannabis products will remain under the direct supervision and custody of authorized facility agents.

Agents will ensure that:

• cannabis products remain secured during transport
• transport documentation remains with the shipment
• the receiving facility acknowledges receipt upon delivery

These procedures ensure full compliance with Utah Code §4-41a-404 and all applicable Utah Administrative Rules governing the transportation of medical cannabis.

GRAMA Claim of Business Confidentiality

Pursuant to Utah Code Section 63G-2-305(1) and (2), and in accordance with Section 63G-2-309, BEEHIVE BC LLC dba BEEHIVE FARMACY (company name) asserts a claim of business confidentiality to protect the following information submitted as part of a Request for Proposals.

- [X] non-public financial statements
- [X] specific employee name and contact information
- [X] specific customer information, client lists, or subscription lists
- [X] other (specify):

STANDARD OPERATION PROCEDURES, SAFETY PROTOCOLS, EMPLOYEE INFORMATION, SECURITY LAYOUTS, SENSITIVE INFORMATION FOR BOTH THE BUSINESS AND THE SAFETY OF ITS EMPLOYEES

This claim is asserted because this information requires protection as it includes:

[X] trade secrets as defined in Utah Code Section 13-24-2 ("Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, or process, that: (a) derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and (b) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.)

[X] commercial information or non-individual financial information obtained from a person if: (a) disclosure of the information could reasonably be expected to result in unfair competitive injury to the person submitting the information or would impair the ability of the governmental entity to obtain necessary information in the future; [and] (b) the person submitting the information has a greater interest in prohibiting access than the public in obtaining access.

Following is a concise statement of reasons supporting the claim of business confidentiality:

Beehive believes the information that is redacted provides specific detail about the business, its facilities, its operating procedures, as well as detailed information about the company's staff, includes sensitive information that poses a safety and security risk for the business and its employees

Signed: _____

On behalf of (company): BEEHIVE BC LLC dba BEEHIVE FARMACY

Date: 4.3.26

Utah Department of Agriculture and Food

4315 S 2700 W
Taylorsville,
UT 84129

cannabis@utah.gov
801-982-2375

Medical Cannabis Pharmacy Operating Plan Coversheet

In accordance with 26B-4-2, 4-41a and R66 a licensed Utah medical cannabis pharmacy must have an operating plan that describes how the pharmacy will comply with all applicable operating standards, statutes and administrative rules. **This document is not intended to be a full comprehensive list of all operating standards, statutes and administrative rules; it displays the minimum operating requirements for a facility.** Medical cannabis facilities must be familiar with and comply with all operating standards, statutes and administrative rules. Statues and administrative rules change frequently, verify you are using the most up to date form.

"Medical cannabis pharmacy" means a person that: acquires or intends to acquire medical cannabis from a cannabis processing facility or another medical cannabis pharmacy or a medical cannabis device; or possesses medical cannabis or a medical cannabis device; and sells or intends to sell medical cannabis or a medical cannabis device to a medical cannabis cardholder.

"Home delivery medical cannabis pharmacy" means a medical cannabis pharmacy that the department authorizes, as part of the pharmacy's license, to deliver medical cannabis shipments to a delivery address to fulfill electronic orders.

Application type

☑ Renewal ☐ Updated Submission/Change

Acknowledgements

The applicant understands that as an applicant and potential licensee you are REQUIRED to know the current statutory law, administrative rules and Departmental policies and comply in full? ☑ Yes ☐ No

The applicant understands that a license is not transferrable or assignable. ☑ Yes ☐ No

Medical Cannabis Pharmacy Operating Checklist

Please attach operating plan and page specification for required sections in a single PDF. All be numbered sequentially to match the page numbers cited in this covershe

[redacted]

Business Documents & Information

Business Name & DBA.

Physical Address & Mailing Address.

Business contact information (phone & e-mail).

Primary contact(s) for facility and information (position, phone, e-mail).

Active business license from city.

Proof of Performance bond/liquid cash account.

Land use permit, proximity waiver or other supporting documents for the business location.

A description of any investigation or adverse action taken by any licensing jurisdiction, government agency, law enforcement agency, or court in any state for any violation or detrimental conduct in relation to any of the applicant's cannabis-related operations or businesses. **If there is none for this business, please put N/A for the page number.**

Organization Information

The name and address of an individual who:
(A) for a publicly traded company, has a financial or voting interest of 10% or greater in the proposed medical cannabis pharmacy;
(B) for a privately held company, a financial or voting interest in the proposed medical cannabis pharmacy; or
(C) has the power to direct or cause the management or control of a proposed medical cannabi pharmacy;

A description of the credentials and experience of: each officer, director, or owner of the proposed medical cannabis pharmacy; and any highly skilled or experienced prospective employee.

Advertising standards (signage, website, etc.) and description of how business will comply with requirements.

Educational events & handout material.

Targeted marketing practice and description of how buiness with comply with requirements.

Services offered by Pharmacy & cooresponding SOPs. (in store, walk up, drive thru, express pick up, delivery).

Records that will be stored by the Pharmacy and plan to maintain for at least 5 years.

Training standards for staff and responsibilities/duties that will be performed based on position type.

Prodecure to ensure staff displays identification badge issued by the Department when on the facility premesis or while engaged in the transport of cannabis.

Describe how the Pharmacy will maintain a list of active employees that have an Agent card an how they will provide that list to the Department upon request.

Building & Security

Business operating hours and hours open to public.

Description of the physical characteristics of the proposed facility, including a floor plan that shows access areas, room descriptions, and an architectural elevation.

Detail the video surveillance system and coverage.

Detailed security plan.

Procedure to prevent medical cannabis from being consumed at pharmacy.

Visitor policy and procedure.

Procedure to report actual or suspected criminal activity.

Inventory & Sales

Transportation Procedure (between pharmacies, recalls/disposition back to processor, etc.).

Detail how the facility will handle: recalls, returns (pateint & processor/cultivation), waste, destruction and disposal.

Procedure to ensure correct labeling on produict received by the Pharmacy, displayed in online store (if applicable), and being dispensed to a pateint.

Detail storage protocols for all product.

Description of the inventory control system and the interaction with the State electronic verification system.

Detail inventory control procedures and procedure to mainatin accurate inventory and reporting of any discrepencies.

Procedure to keep sales within the state or RMP dosage limit, standards for partial filling.

Procedure to prohibit sale of expired, misbranded, adulterated, opened product.

Plan to meet requirements related to the patient information insert. What options are planned to be provided for the patients?

Procedure to verify pateint ID and active medical cannabis card. List procedure for all pick up types available at Pharmacy (in store, pick up, drive through, delivery).

Procedure to protect confidential cardholder data from the EVS and ensure only authorized individuals have access.

Home Delivery (If Applicable)

If the Medical Cannabis Pharmacy is categorized as Home Delivery, please complete this section. If the Pharmacy utilizes a courier service, move on to "Delivery Procedures" section an note "N/A" on coversheet. If Pharmacy does not participate in home delivery to patients in any capacity, disregard both sections and note "N/A"

Description of vehicles used and how security and storage procedures will be maintained durin transport and at facility.

Only deliver during 6am-10pm.

Procedure to ensure medical cannabis is not left unattended in vehicle for more than one hour.

Procedure to ensure the transport medical cannabis in a fully enclosed box, container, or cage, that is secured inside a delivery vehicle, and is held at an appropriate storage temperature throughout the delivery process to maintain the integrity of the product.

Procedure to provide the department with information regarding any vehicle used for the delivery service, including the vehicle's make, model, color, vehicle identification number, and license plate number.

Security plan that is specific for delivery that includes: a communication plan for couriers and dispatch/security team while enroute and clear procedures for handling of theft, security breaches or accidents.

Procedure to ensure that no person other than a pharmacy agent or courier agent is in a delivery vehicle during delivery or during the time medical cannabis is in the vehicle.

Delivery Procedures

Procedure to ensure courier agent wears identification that clearly identifies them to a card holder.

Procedure for creating/mainiting manifest and ensuring no products are transported that do not appear on the manifest.

Procedure for missing items/loss of product.

Record keeping in ICS that ensures accountability for all products.

Detail the system used to provide real time tracking.

Policies for verifying the identity and validity of the individual receiving the medical cannabis to ensure the product is delivered to the correct medical cannabis cardholder or caregiver facility employee.

Procedure to notify the home delivery medical cannabis pharmacy's supervising PMP within 24 hours of when the medical cannabis pharmacy agent first became aware of the missing product

Procedure to notify local law enforcement and the Department on any missing product.

Procedure to log any missing products into the inventory control system.

Procedure to return any undelivered product to the pharmacy.

Procedure to ensure changes are not made to orders.

Procedure to ensure cannabis is not consumed during delivery.

Procedure to verify payment has been made upon delivery.

Procedure to provide PMP contact info and hours of availability.

Change Requests (Renewal Only)

Attach all approved change requets from past year of license.

Certification and Acknowledgements

Applicant understands the requirements for licensure are based on current statute and rule and are subject to change. Applicant agrees as a condition of licensing that he has read and will abide by the provisions of Utah Code 4-41a and all rules promulgated thereunder and all directives of the Utah Department of Agriculture and Food. The applicant also understands that failure to adhere to or maintain the qualifications of their license, may result in suspension or revocation of the license and/or forfeiture of the performance bond or any other remedies allowed by law.

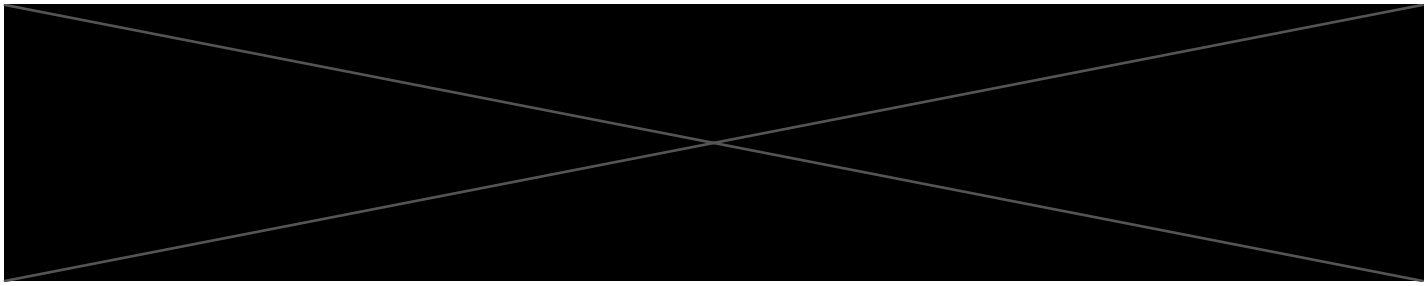
Applicant agrees to immediately notify the department of any change in ownership or financial interest of the facility; the facility's name, change in location, remodeling, expansion, reduction or physical, non-cosmetic alteration of the facility, change in written operating procedures, or change in any information submitted in this application.

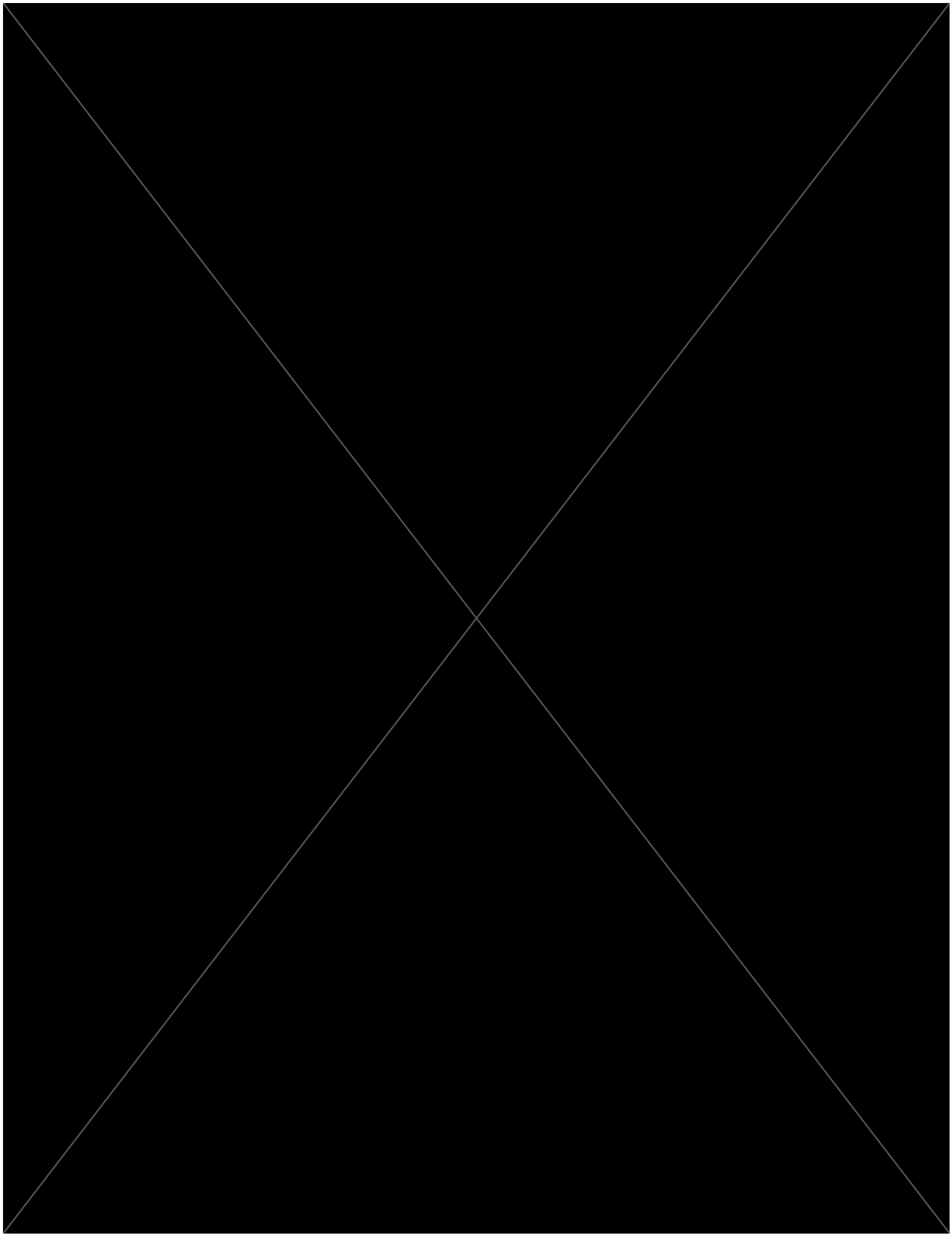
The undersigned acknowledges that representatives of the Utah Department of Agriculture and Food may inspect the records and facility of a cannabis production establishment at any time during business hours to determine and ensure the cannabis production establishment is in compliance with the law. Failure to provide the department or the department's authorized agents immediate access to records and facilities during business hours in accordance with this section may result in a civil monetary penalty; license or registration suspension or revocation; or an immediate cessation of operations under a cease and desist order issued by the department.

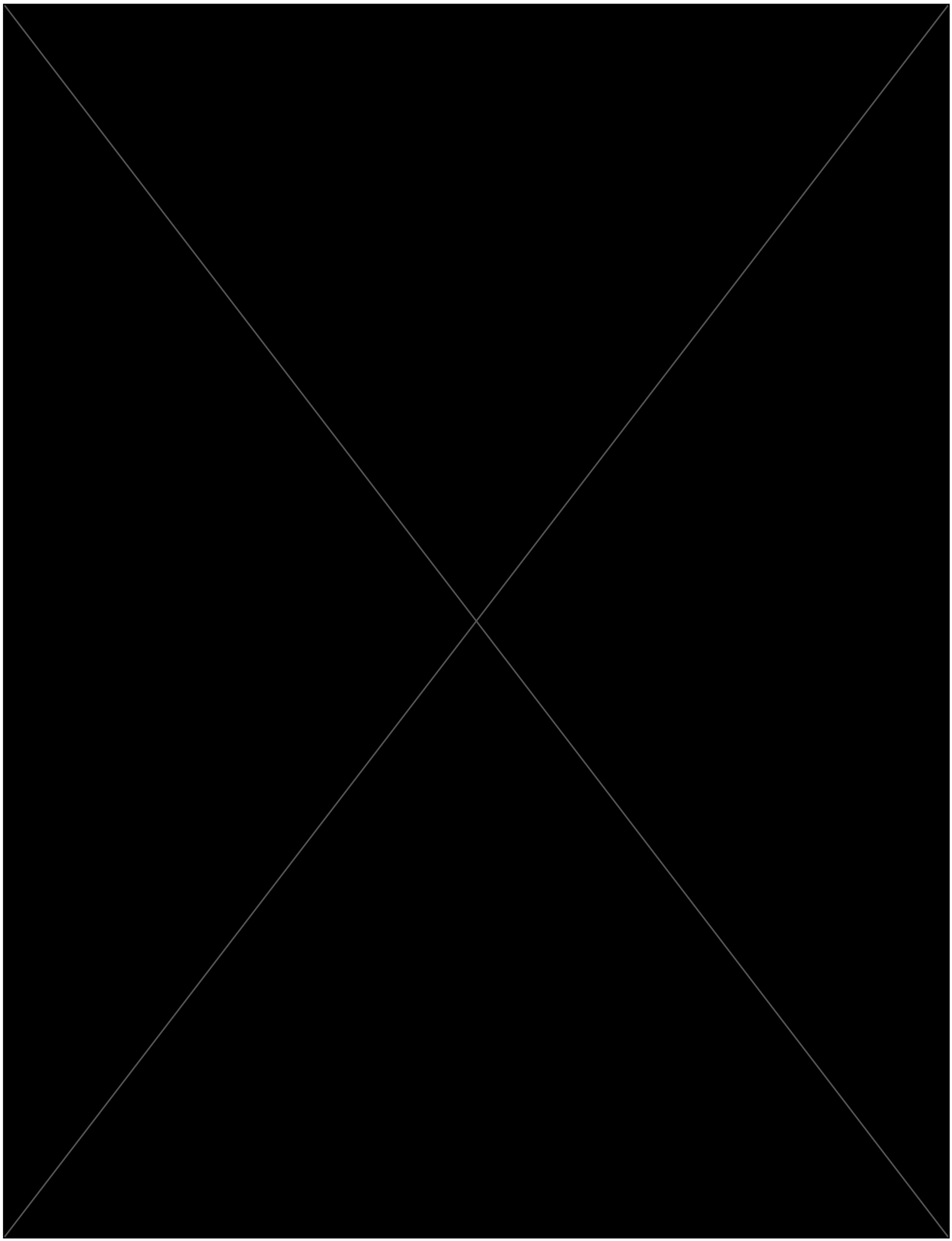
Applicant acknowledges and understands that cultivating, possessing, using, distributing and/or selling marijuana is prohibited by federal law, notwithstanding Utah law or any authorizations in the Agent or this Registration to the contrary. Nothing in this application is intended to provide any guidance or assistance in violating or complying with existing federal laws regulating marijuana cultivation, distribution, or use. Similarly, compliance with state law or the terms of this registration, or possession of the registration card does not confer immunity from enforcement of federal law or federal enforcement practices. Further, nothing in this application or the registration card shall be construed as advice with regard to compliance with applicable federal, state, or local tax laws or any regulatory consequences of engaging in any business in this industry.

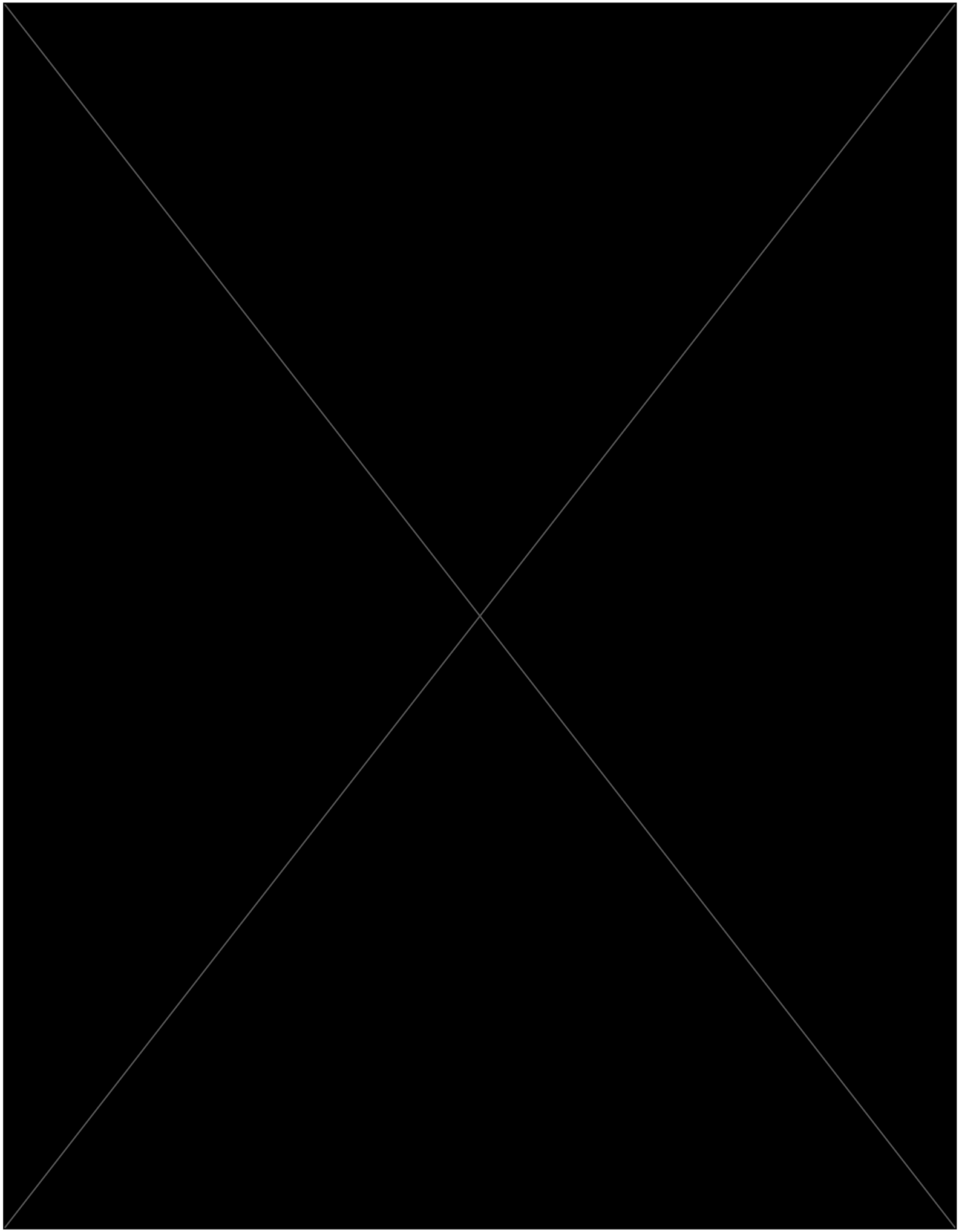
The undersigned acknowledges that they have read and understand the statements herein and the execution thereof is done voluntarily and by the authorization of the applicant entity.

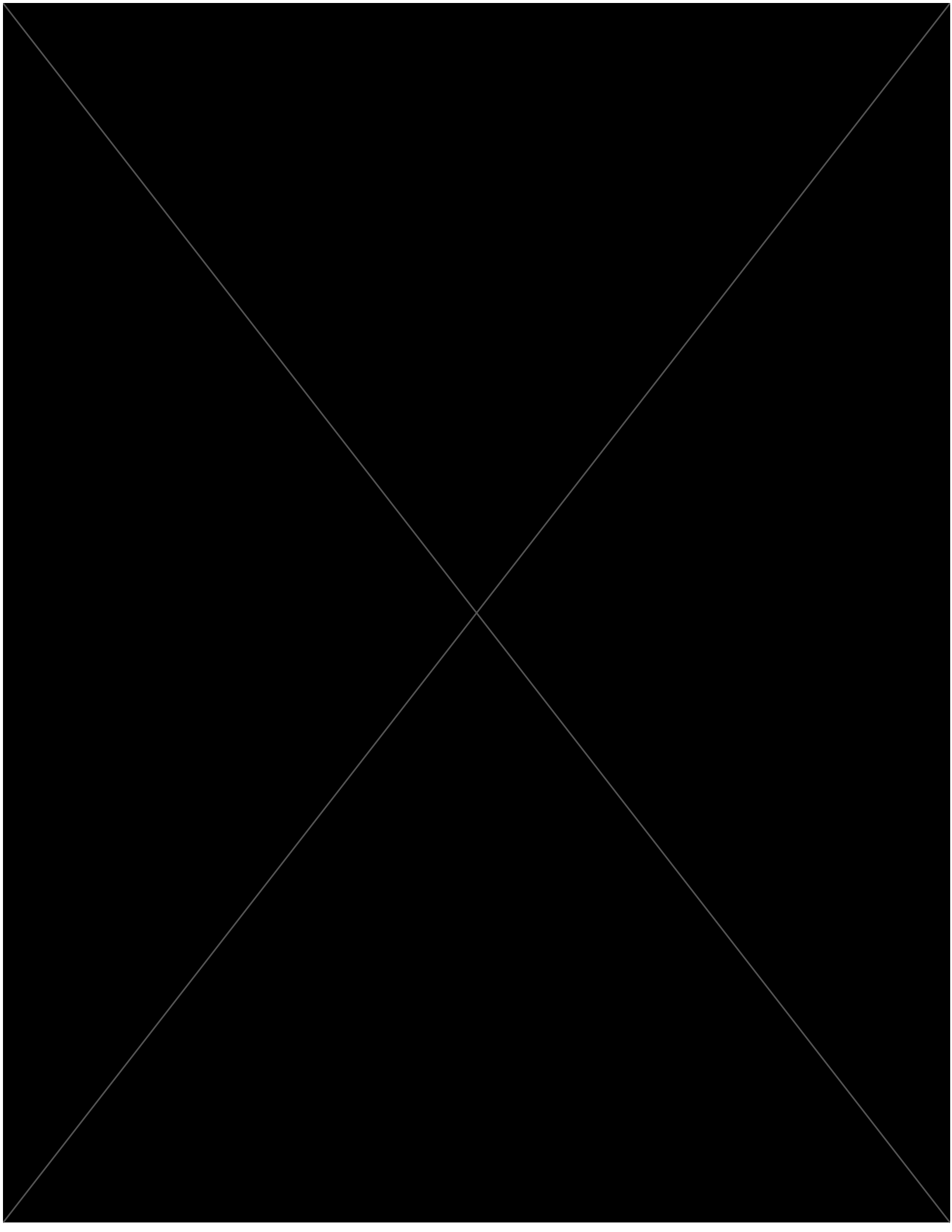
The undersigned hereby makes application to the Utah Department of Agriculture and Food and certifies that the information contained herein and attached here is true and correct.

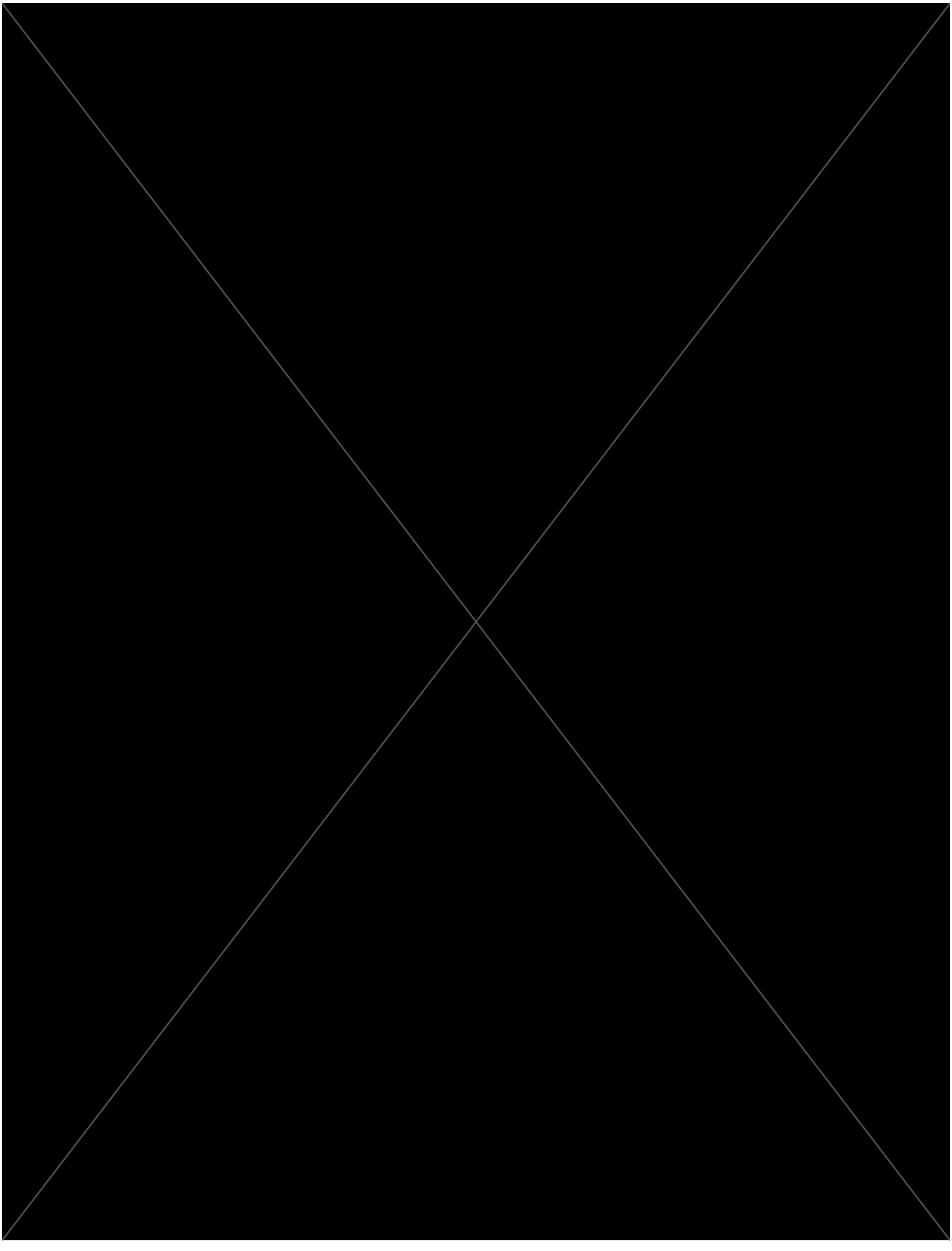


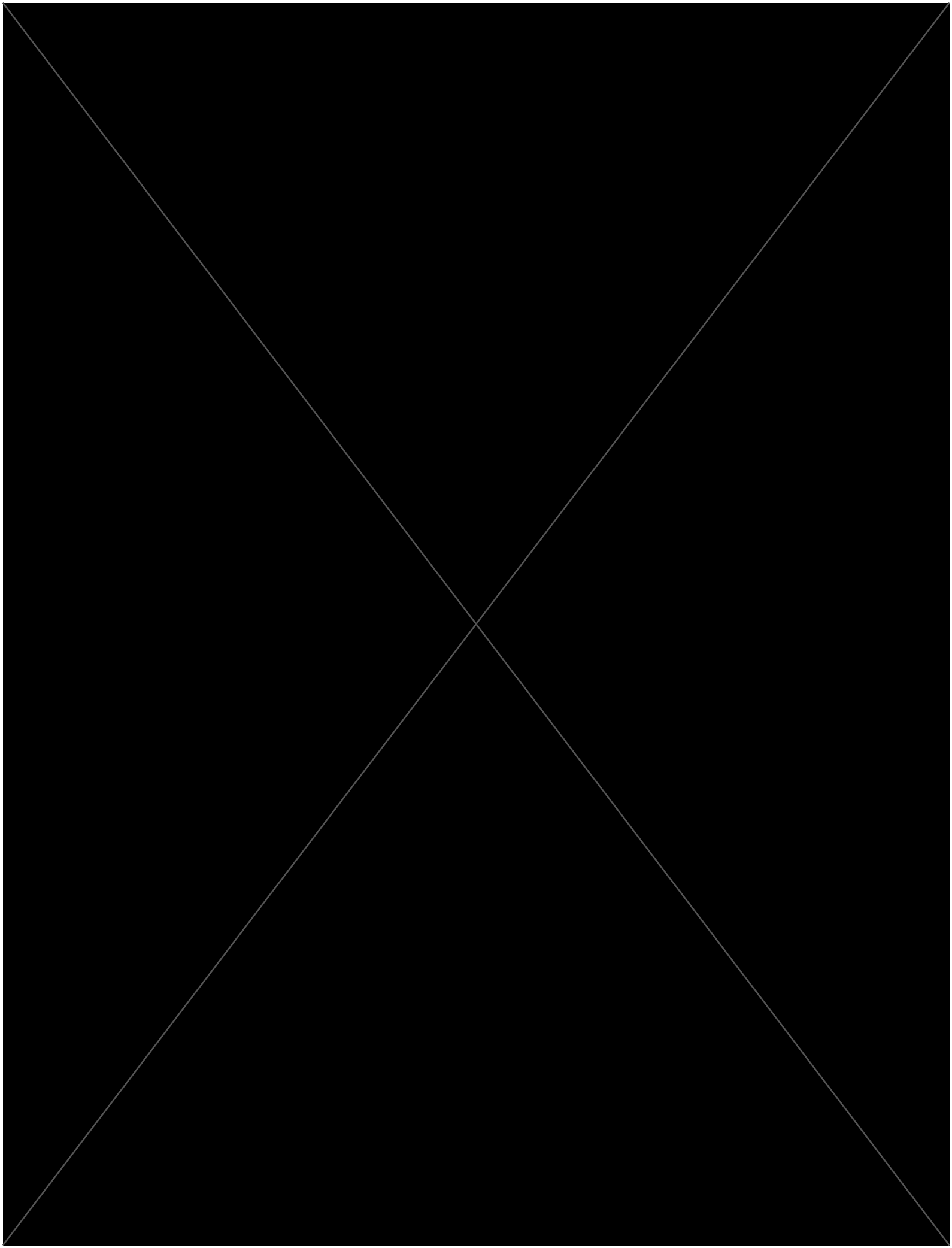


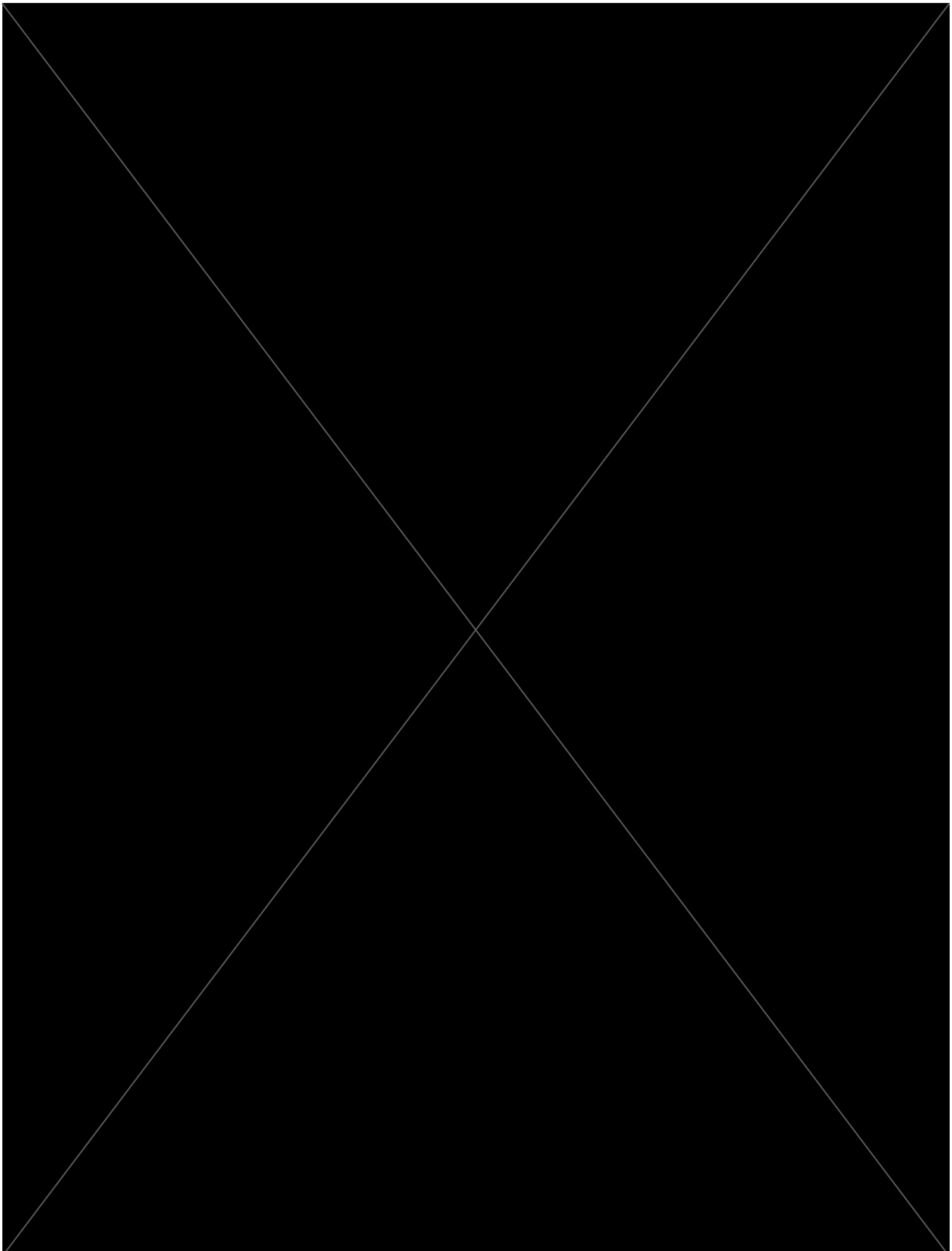


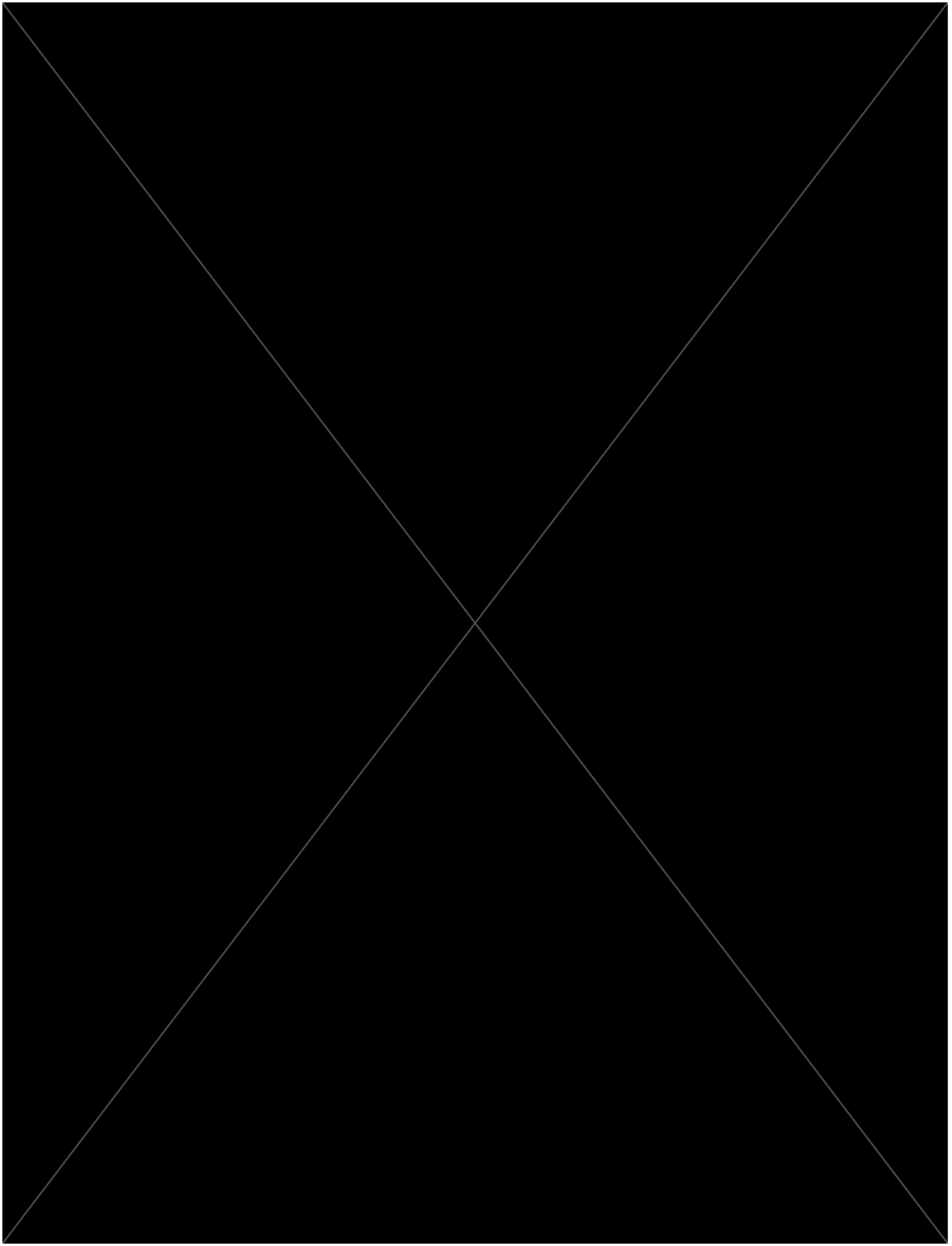


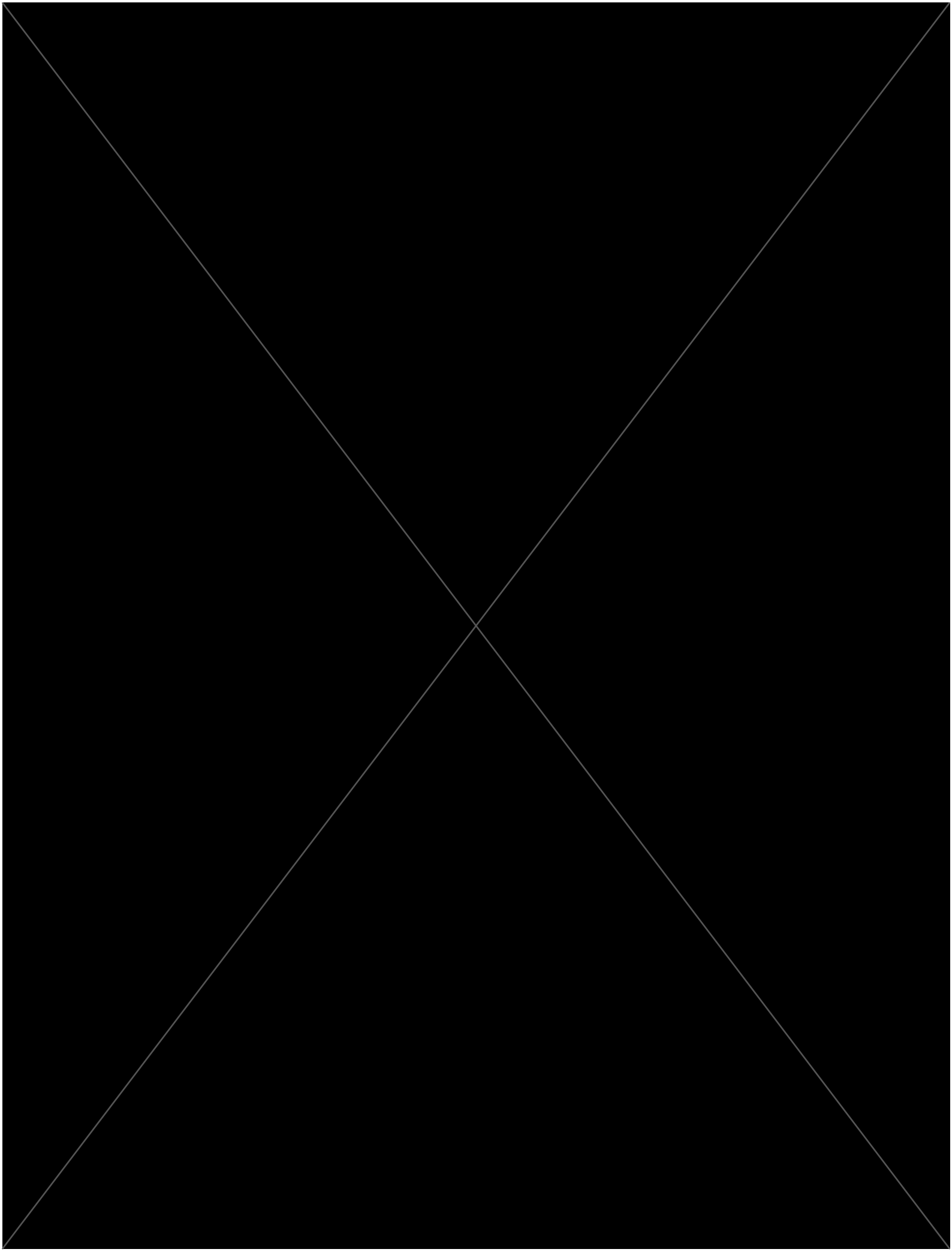


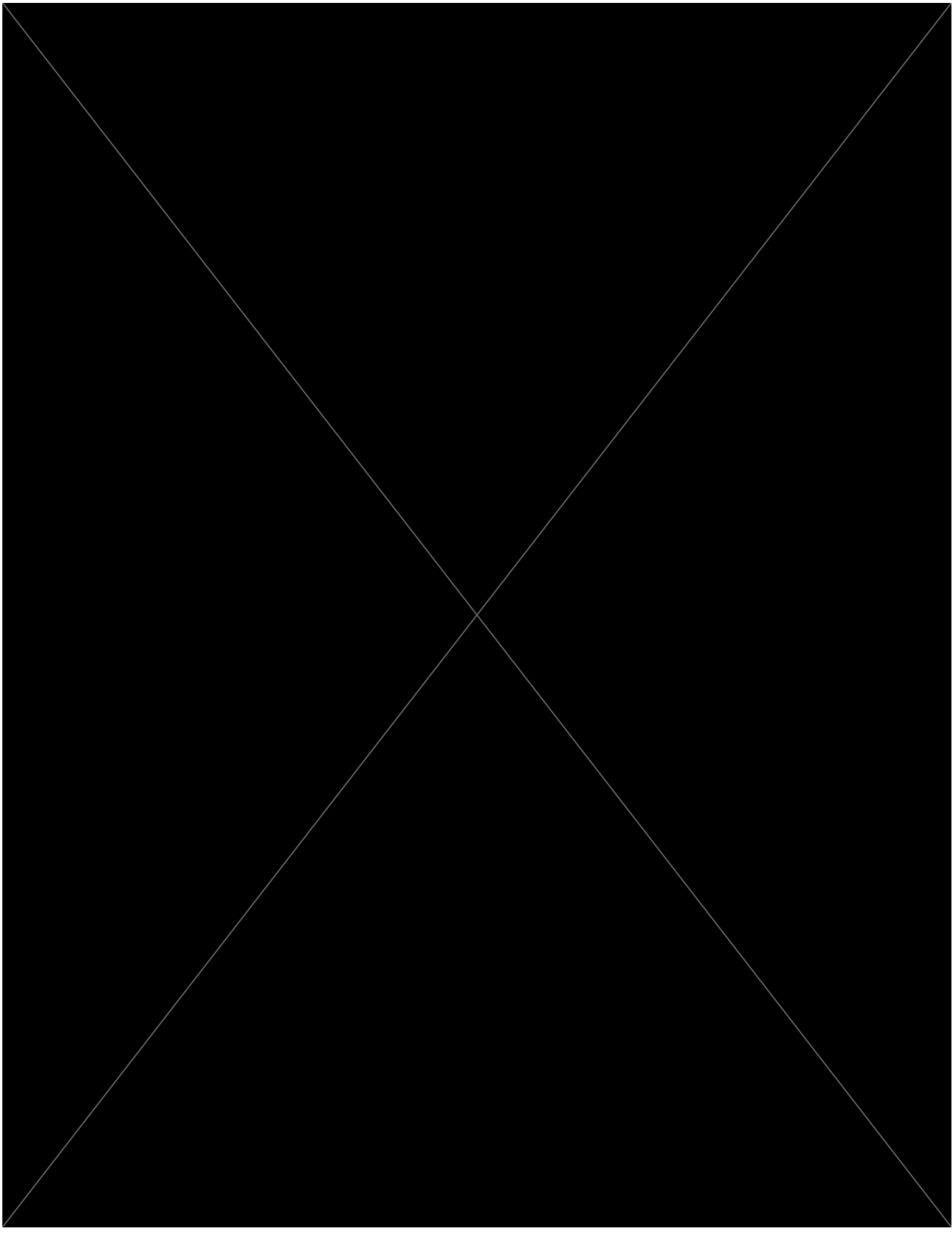


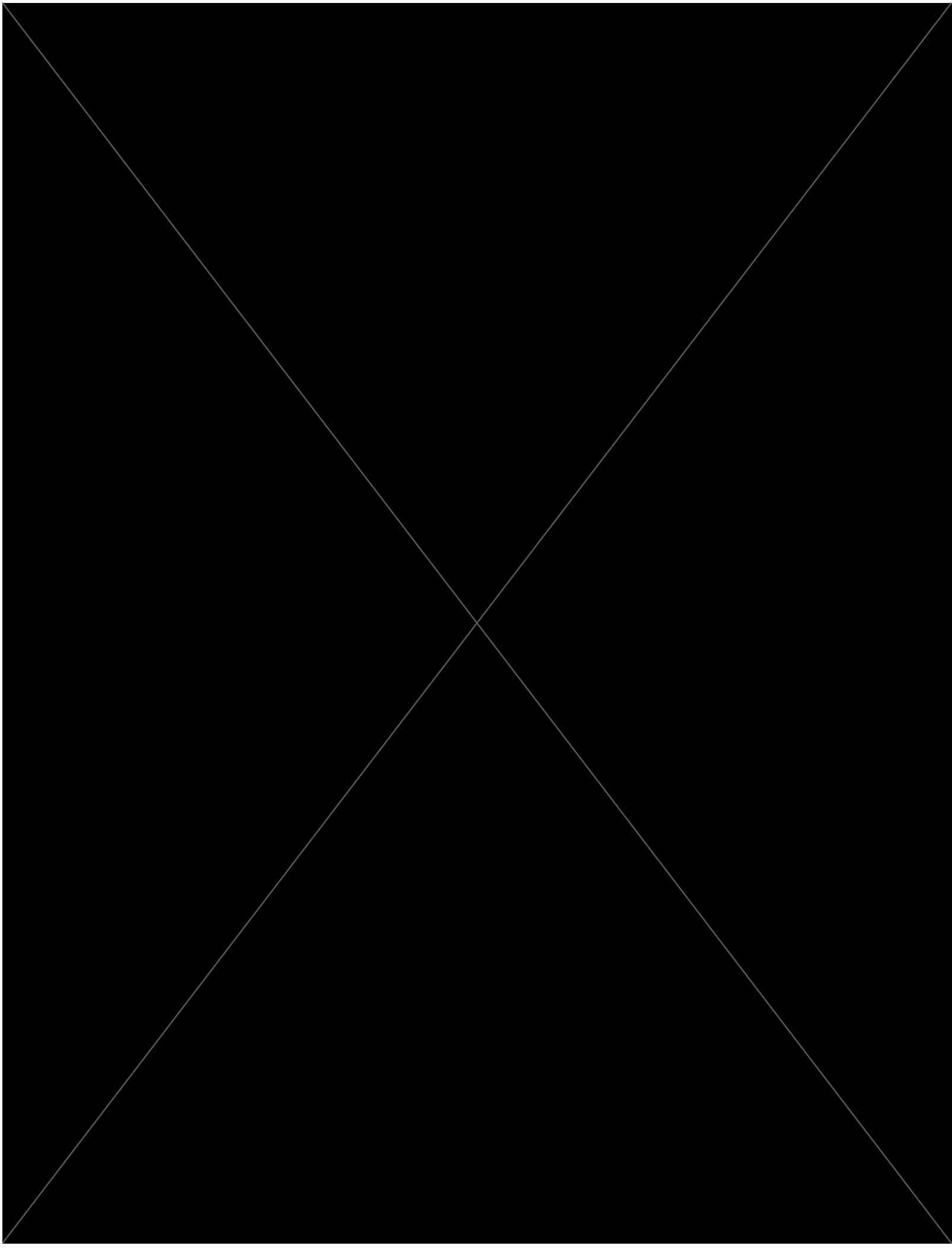


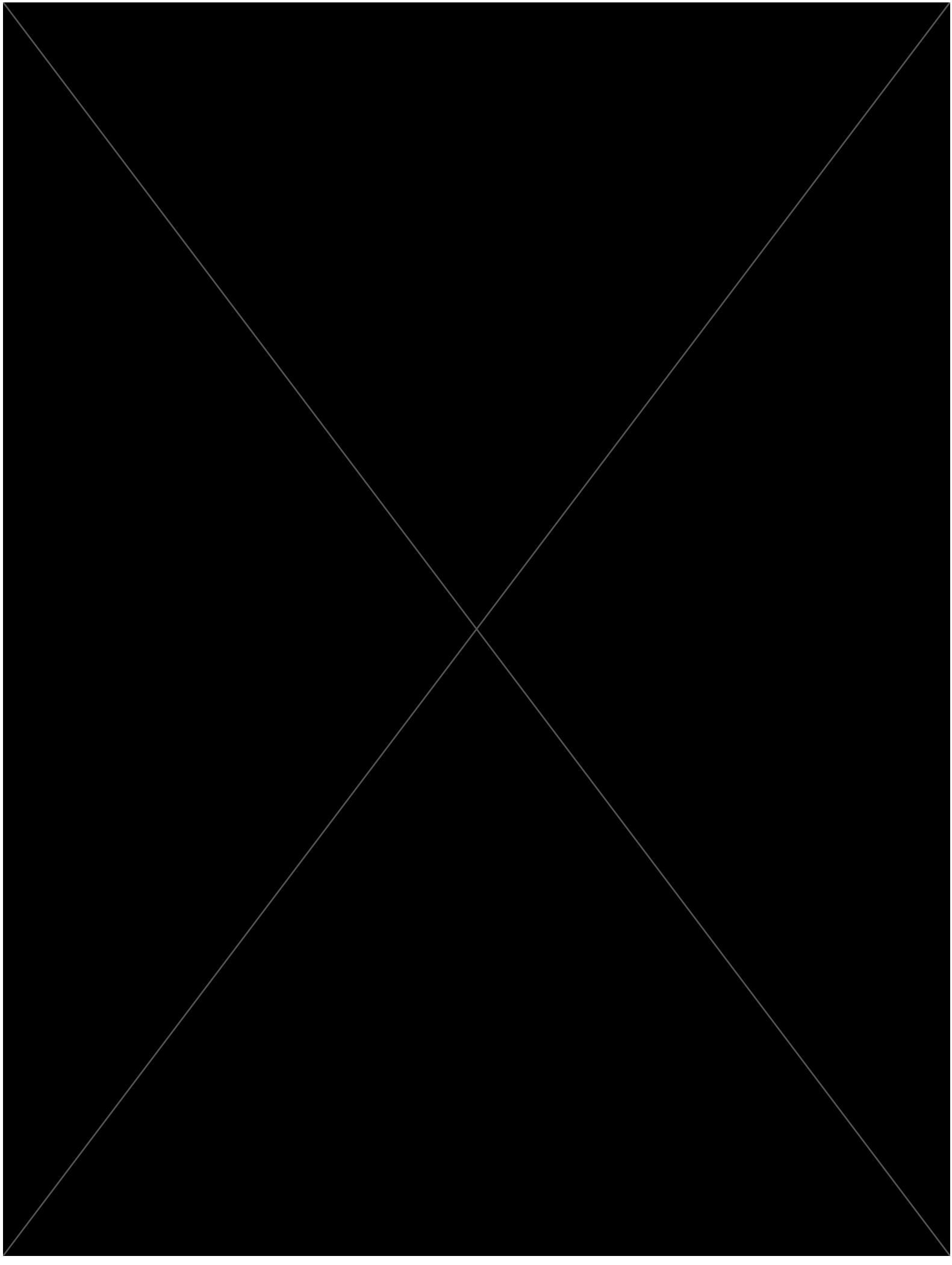


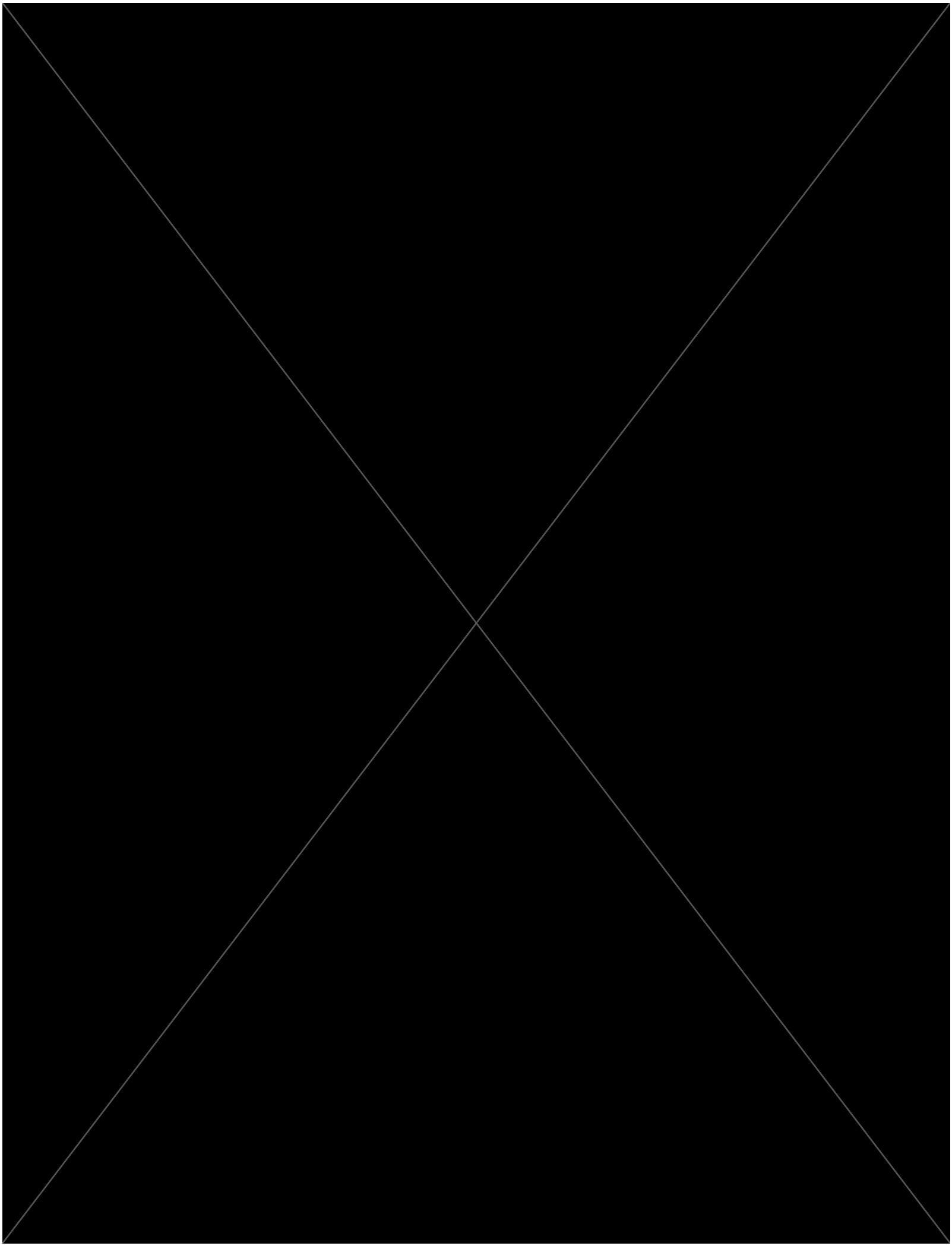


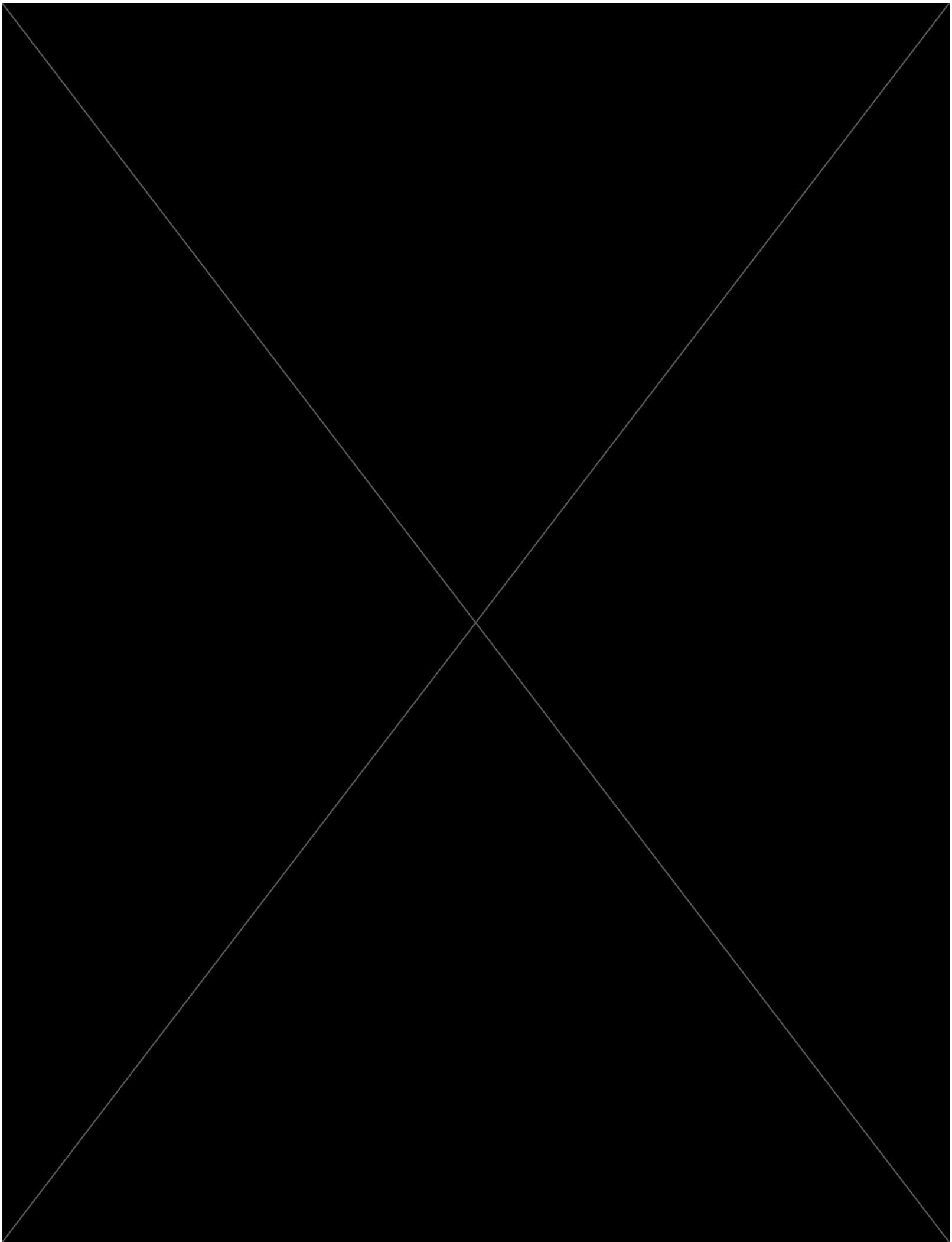


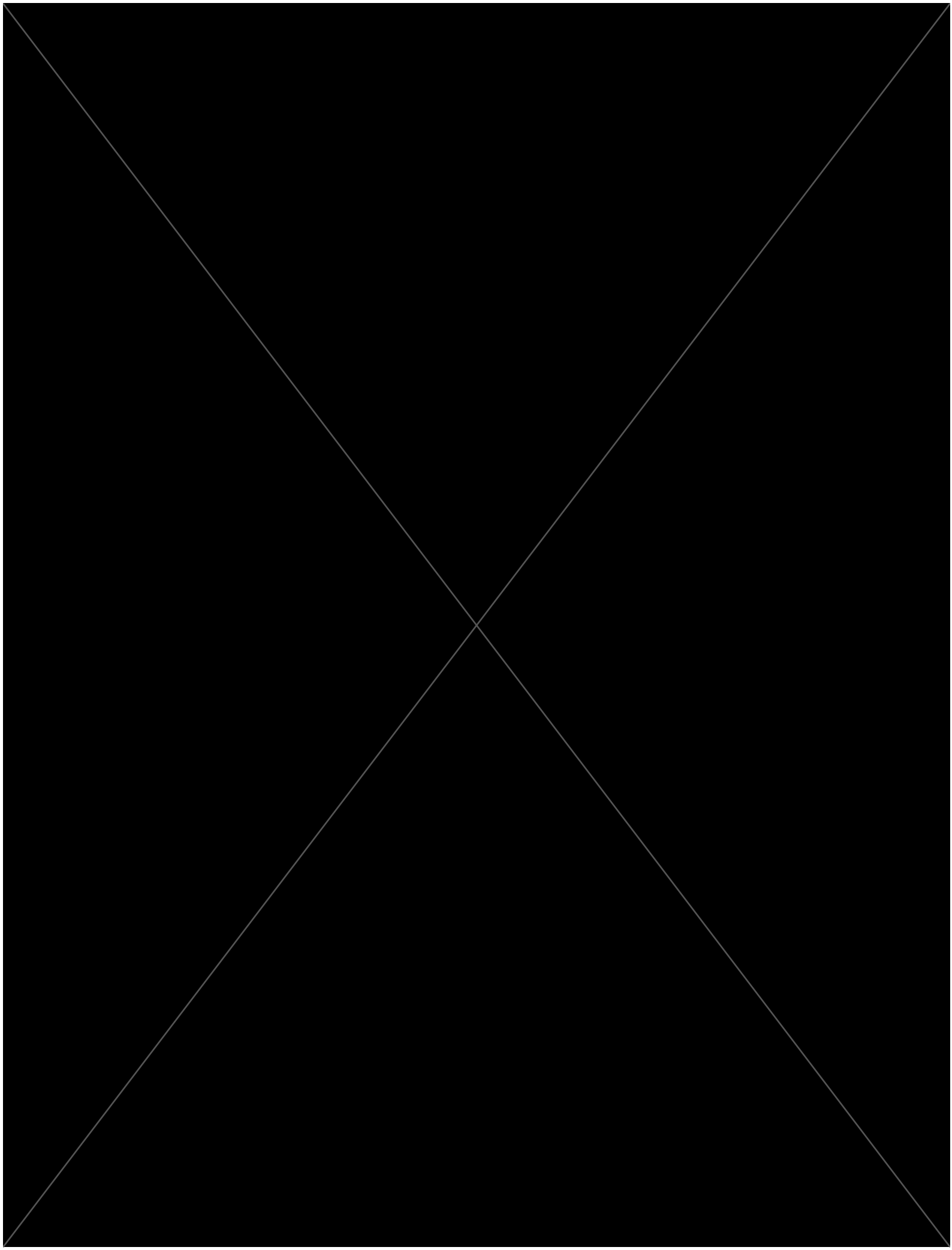


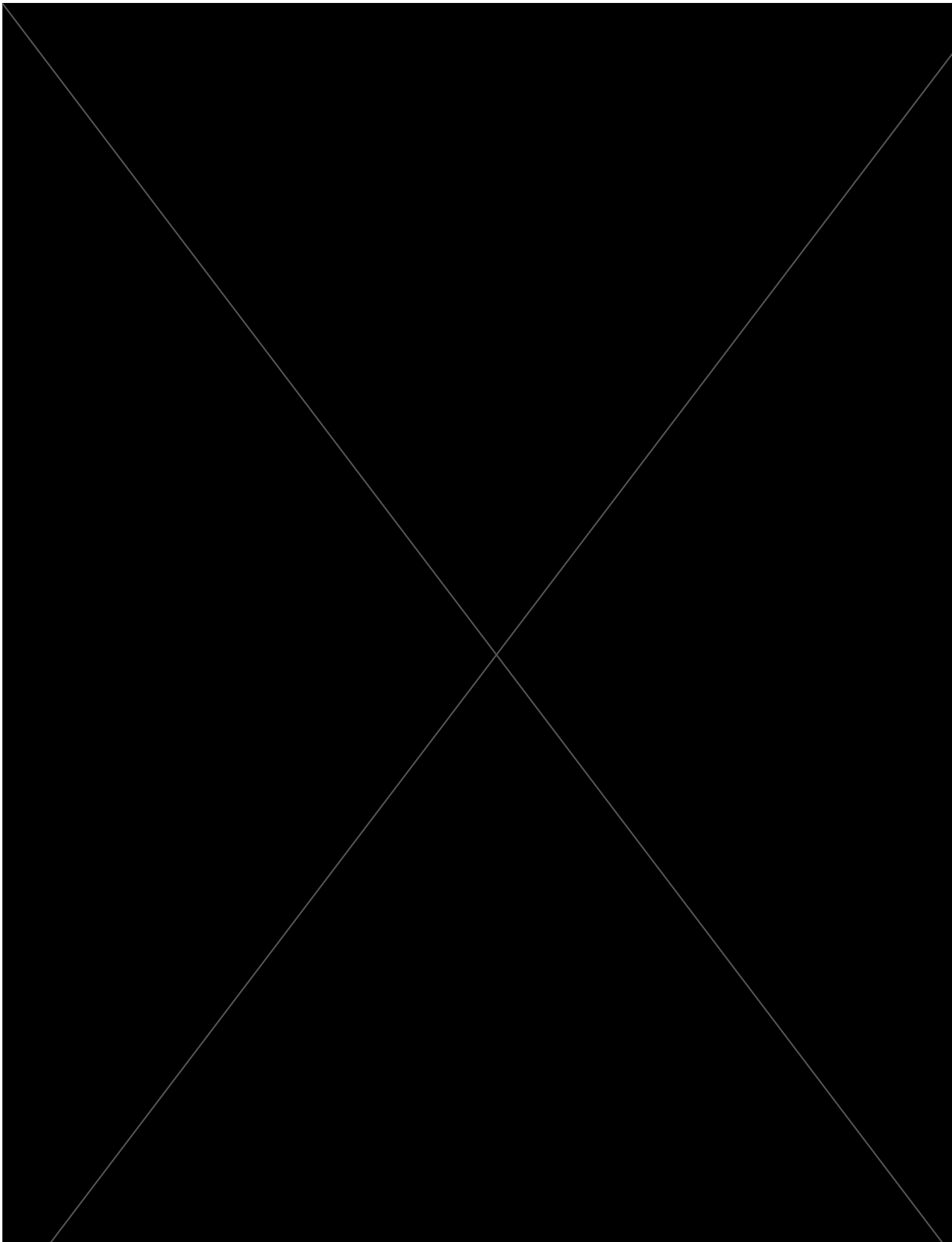


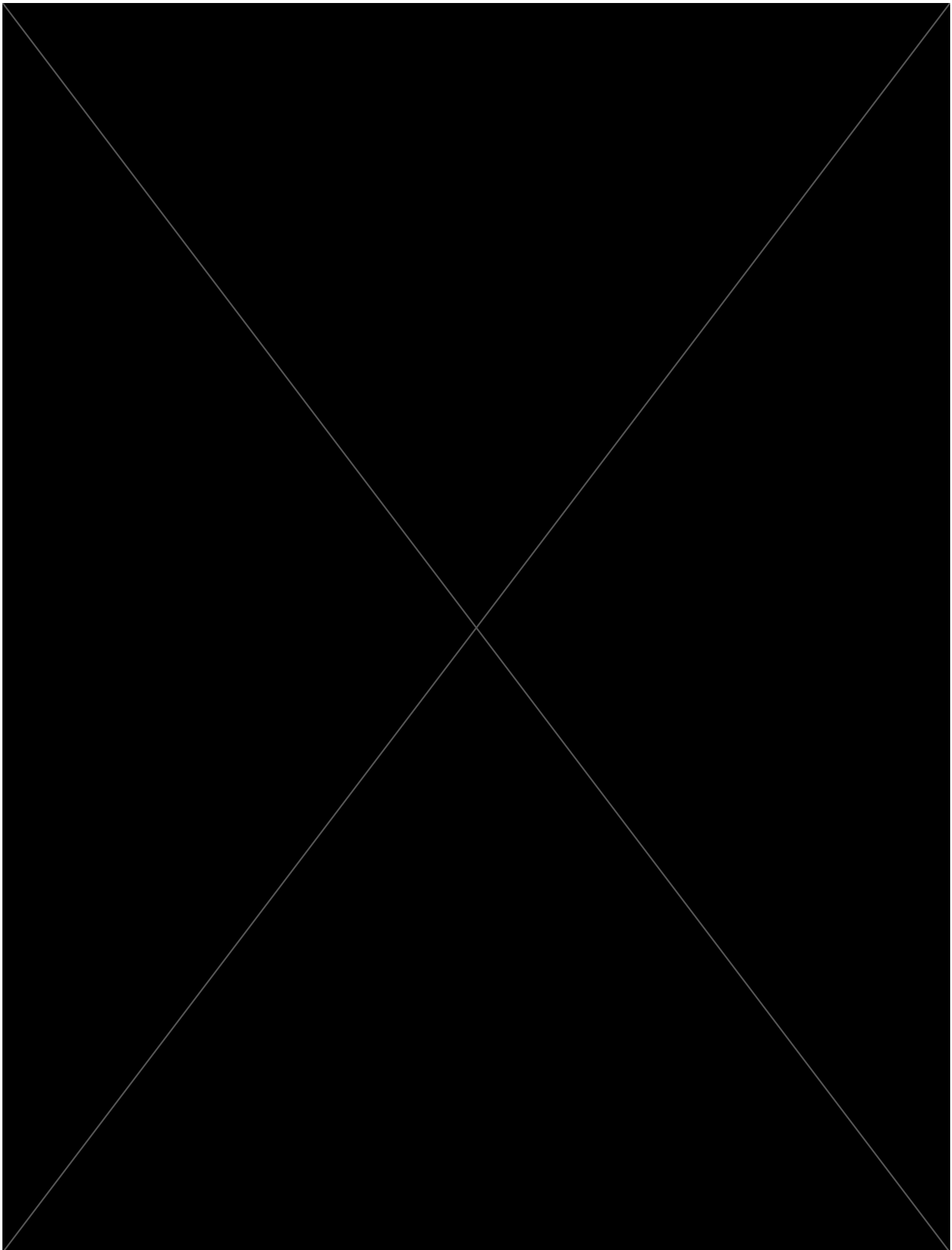


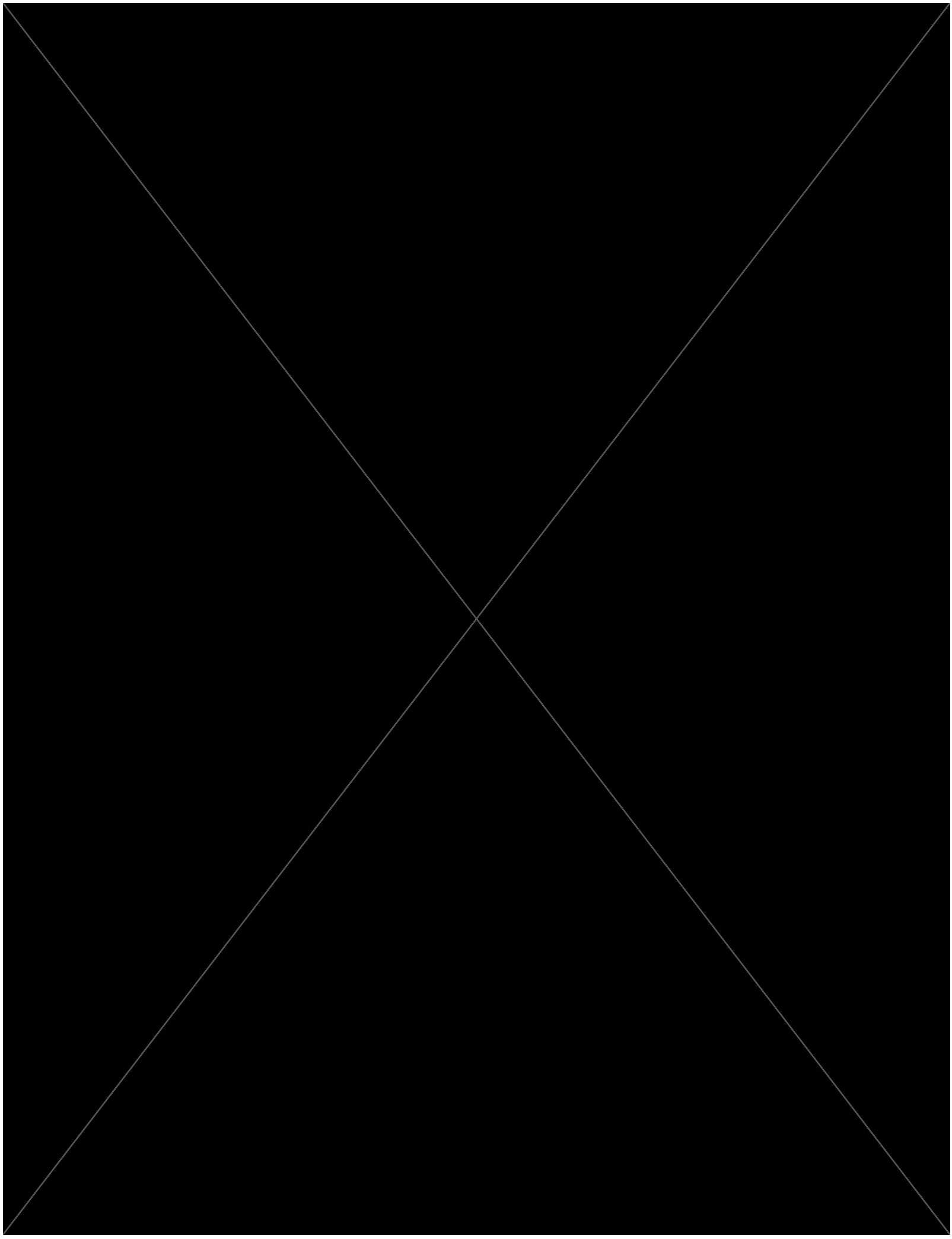


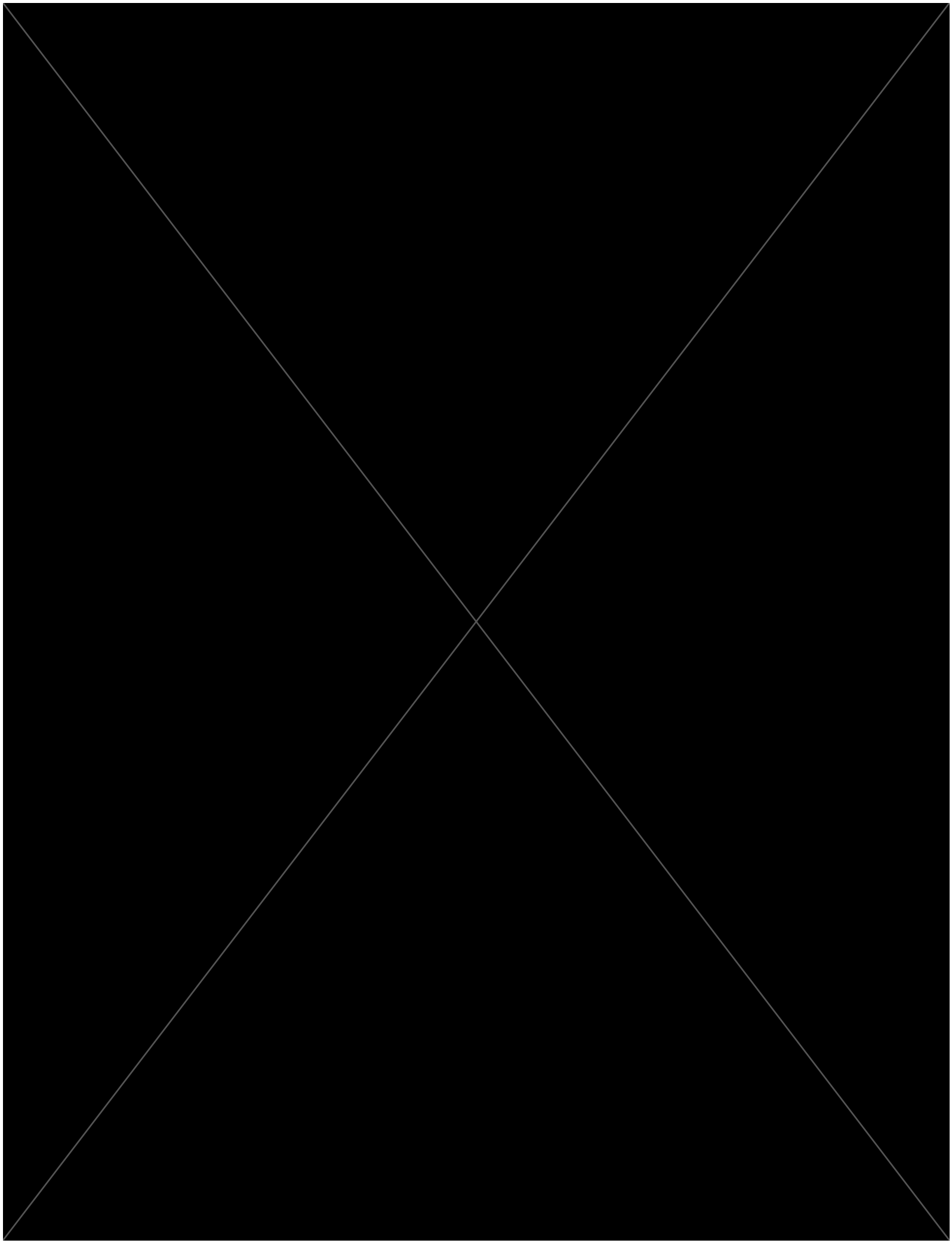


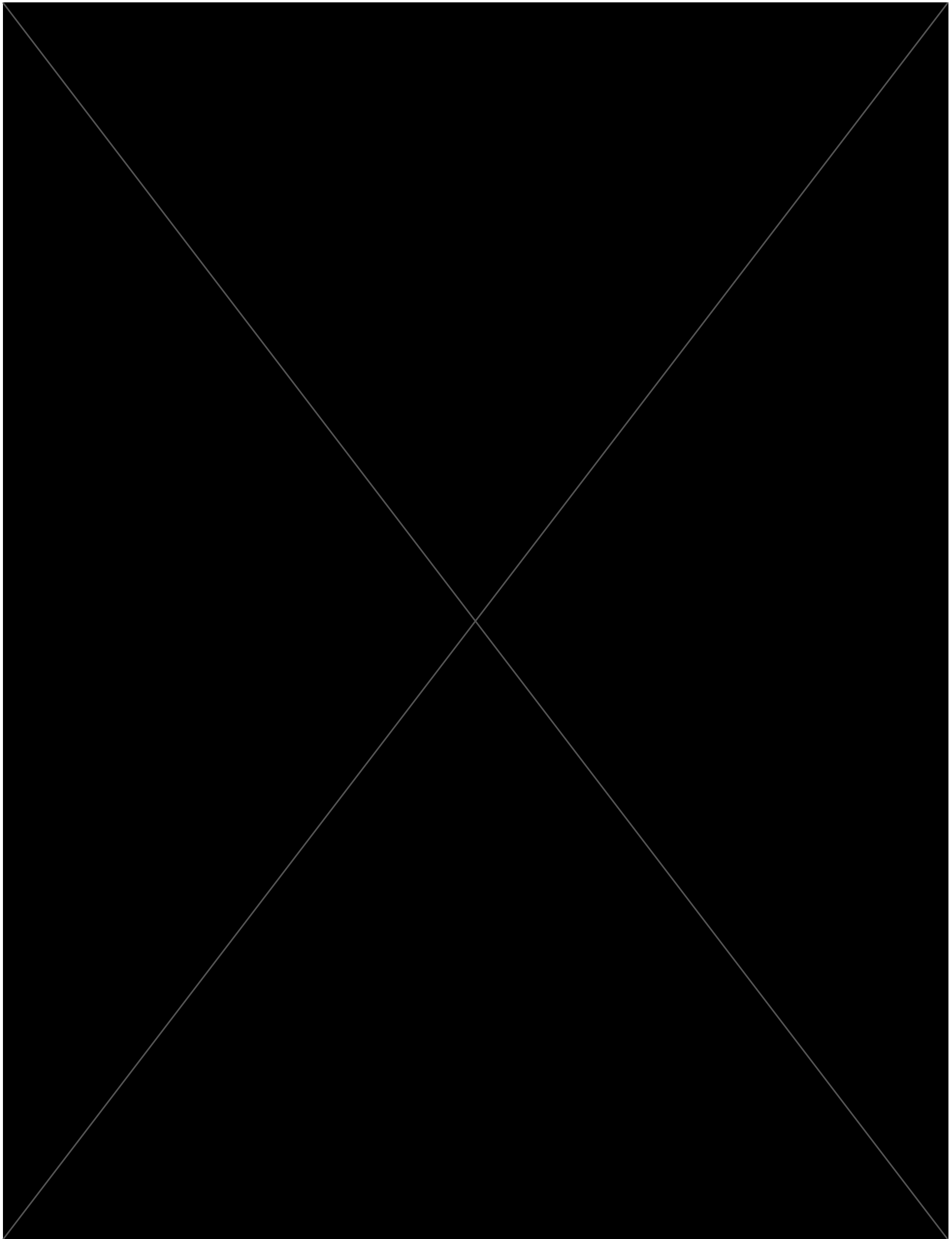


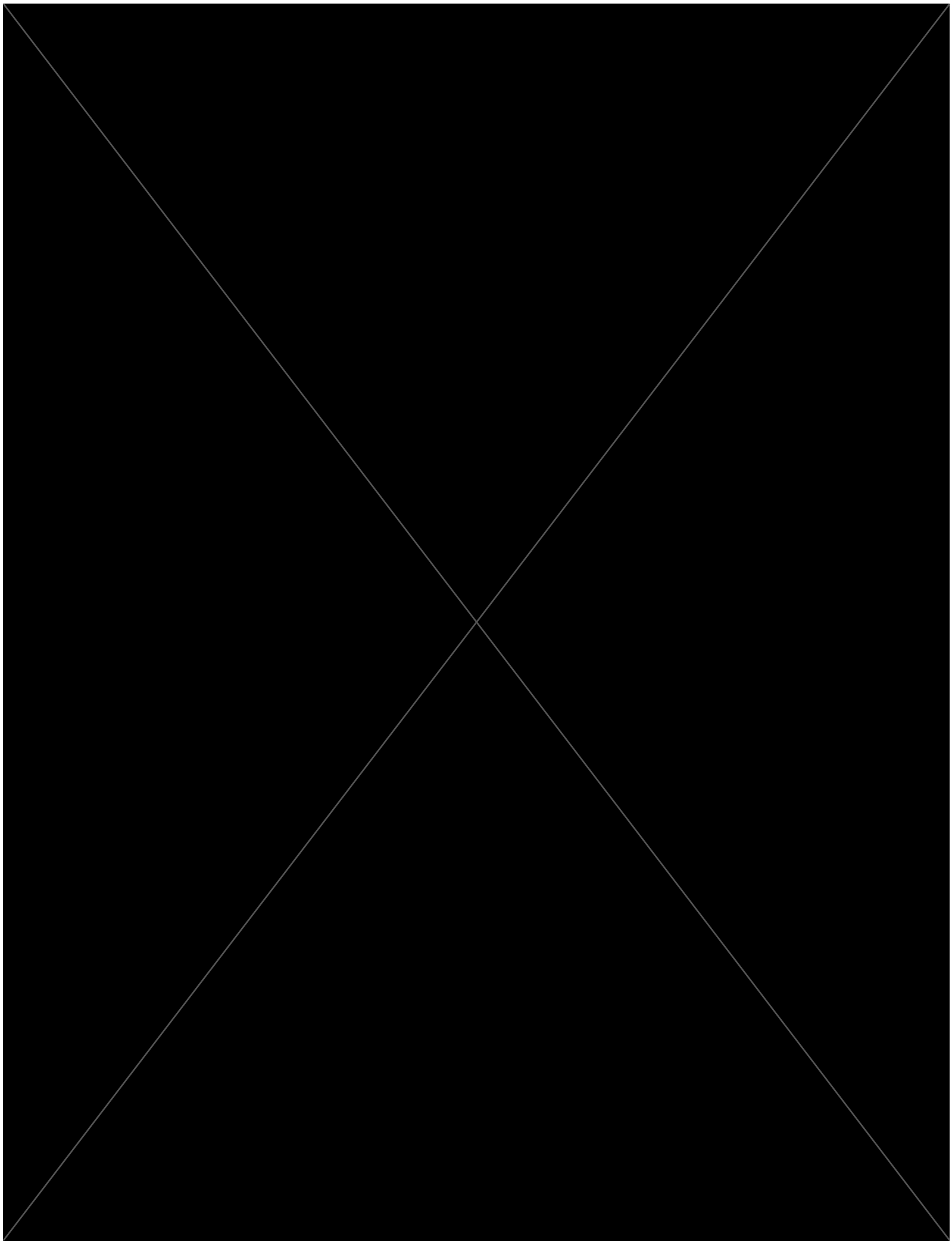


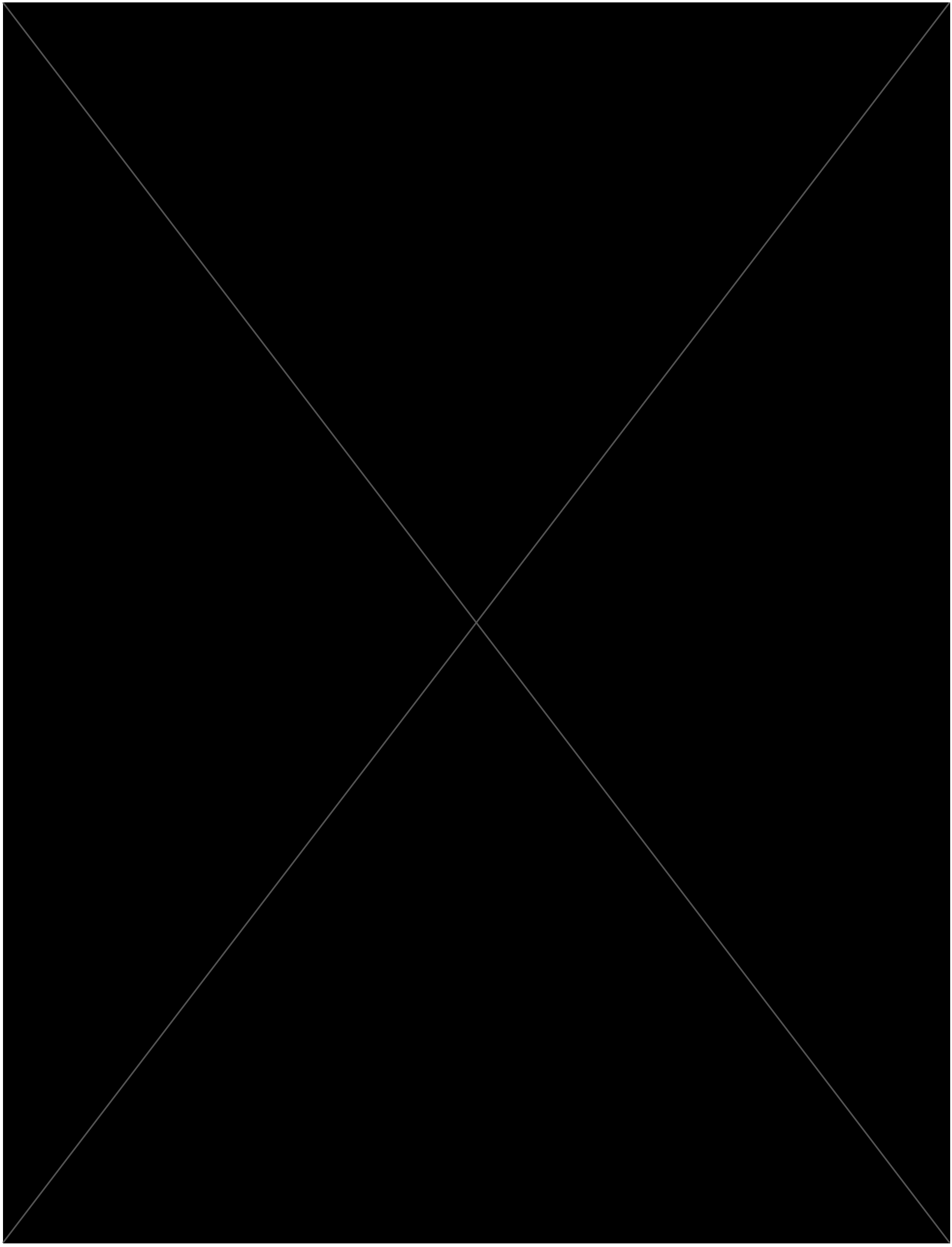


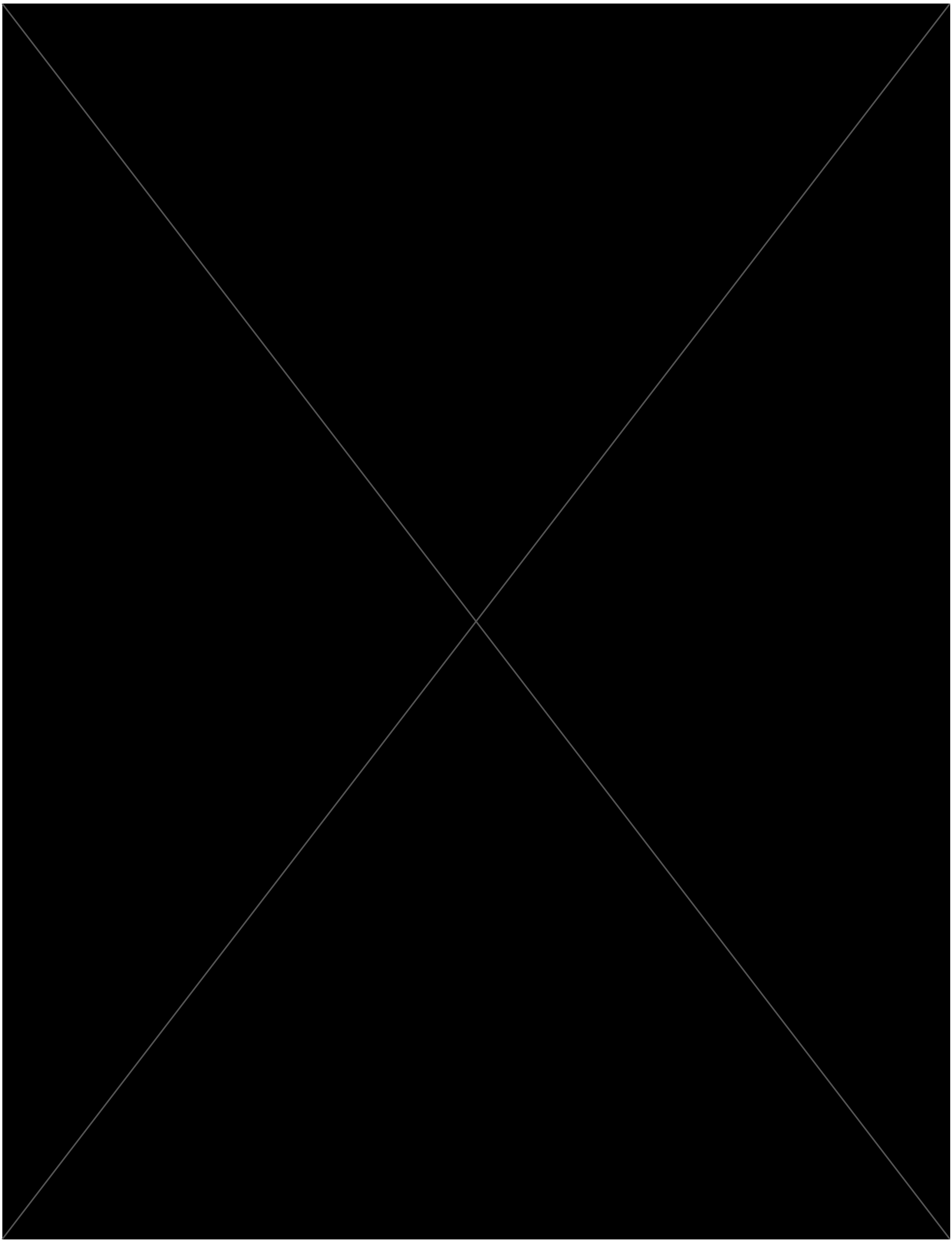


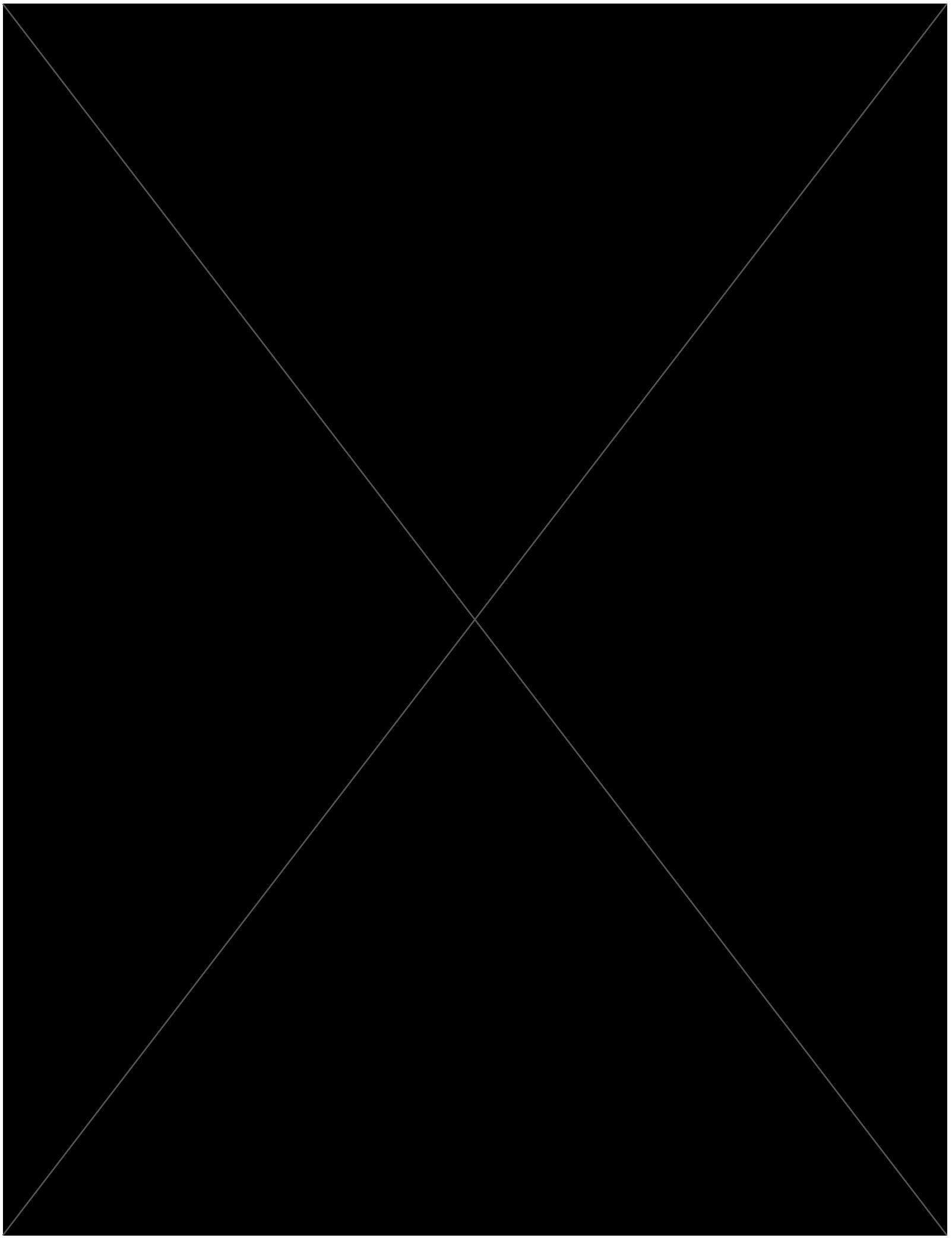


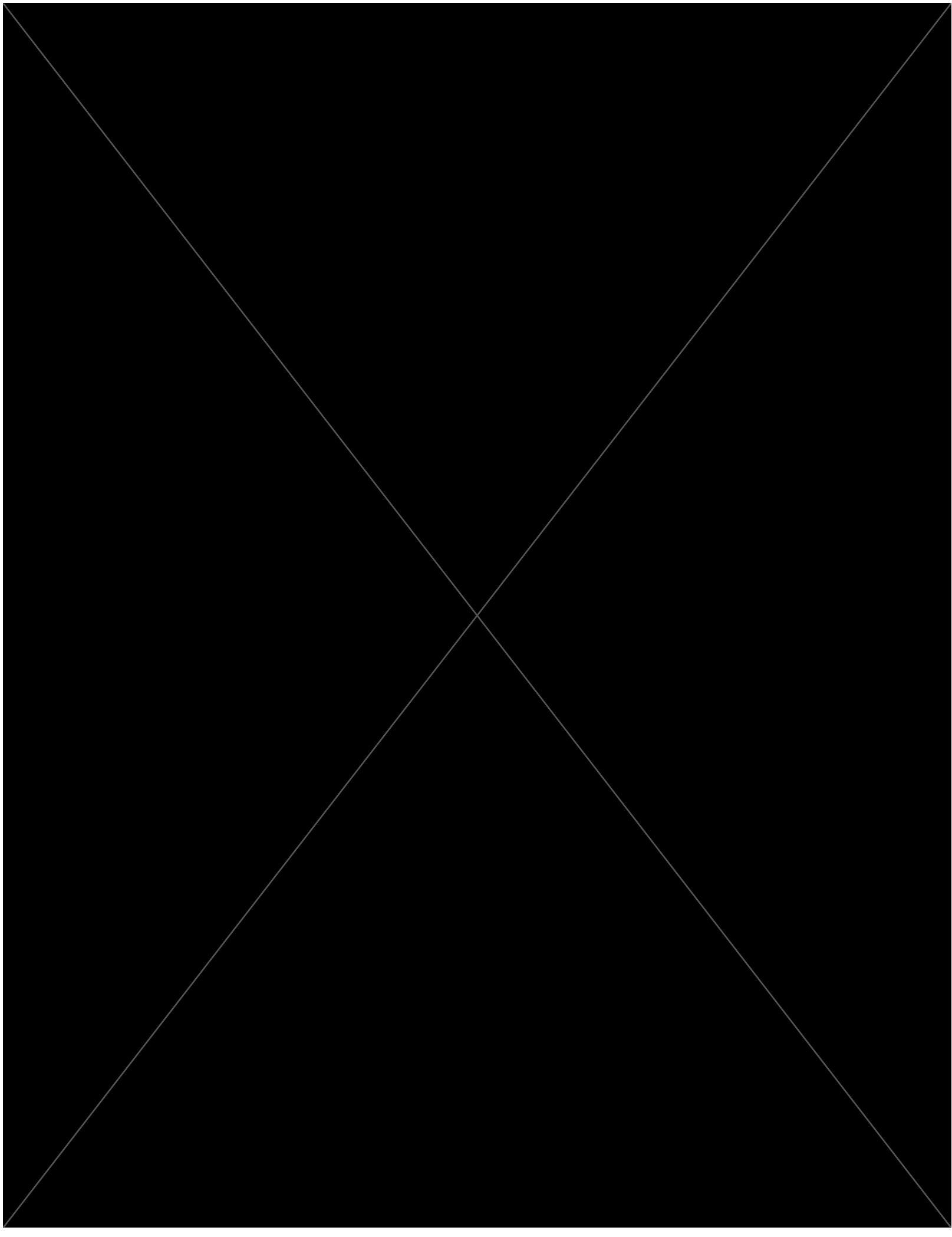


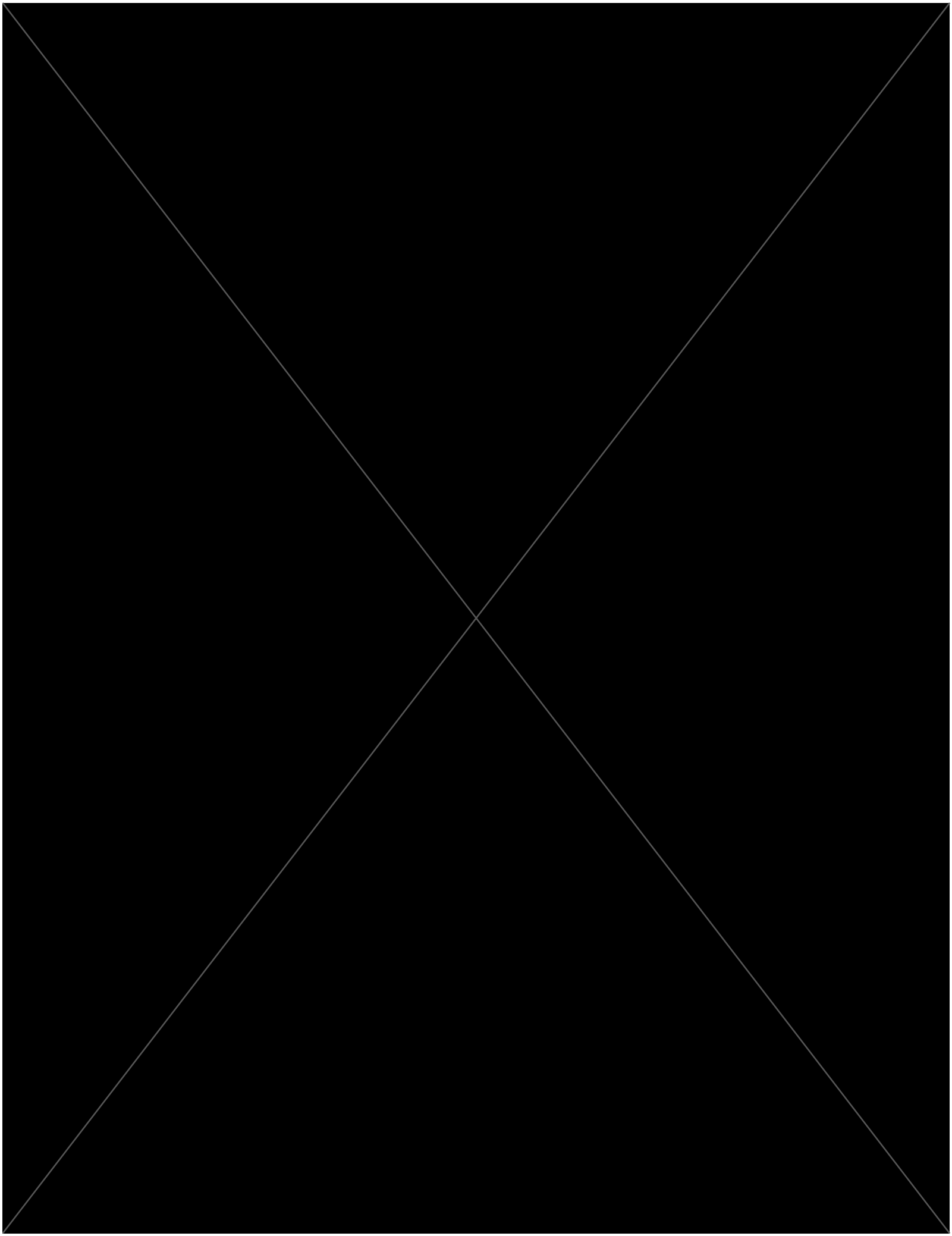


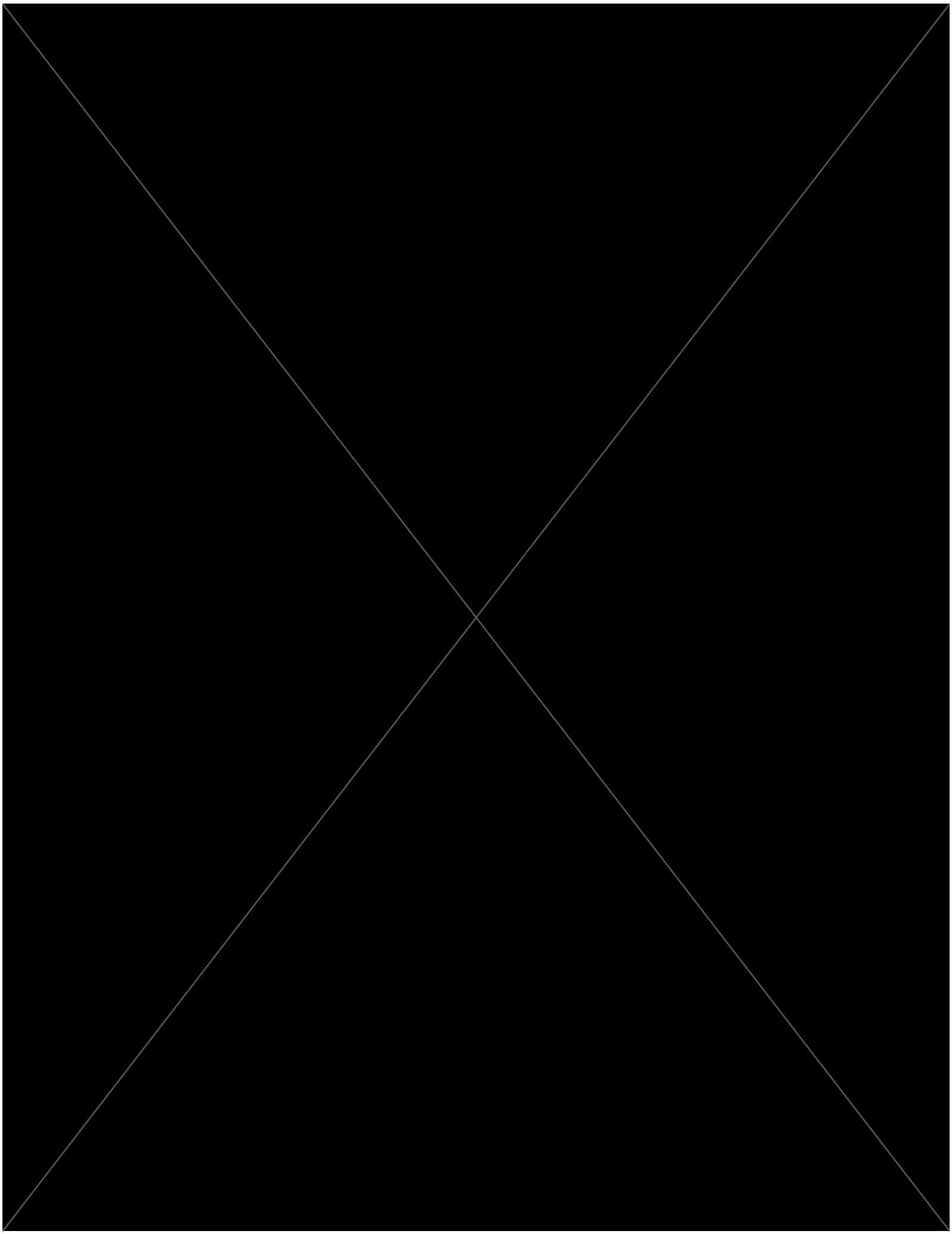


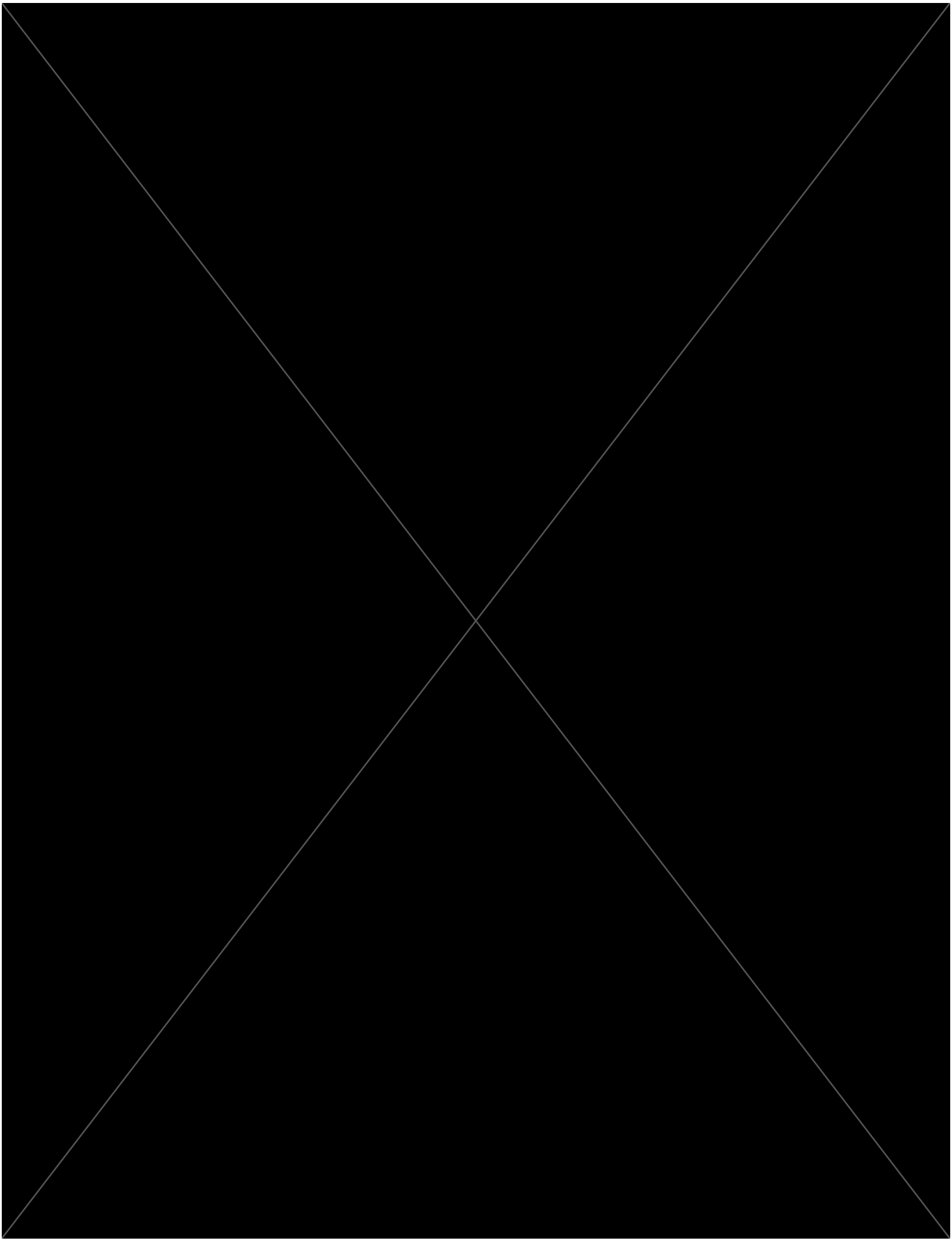


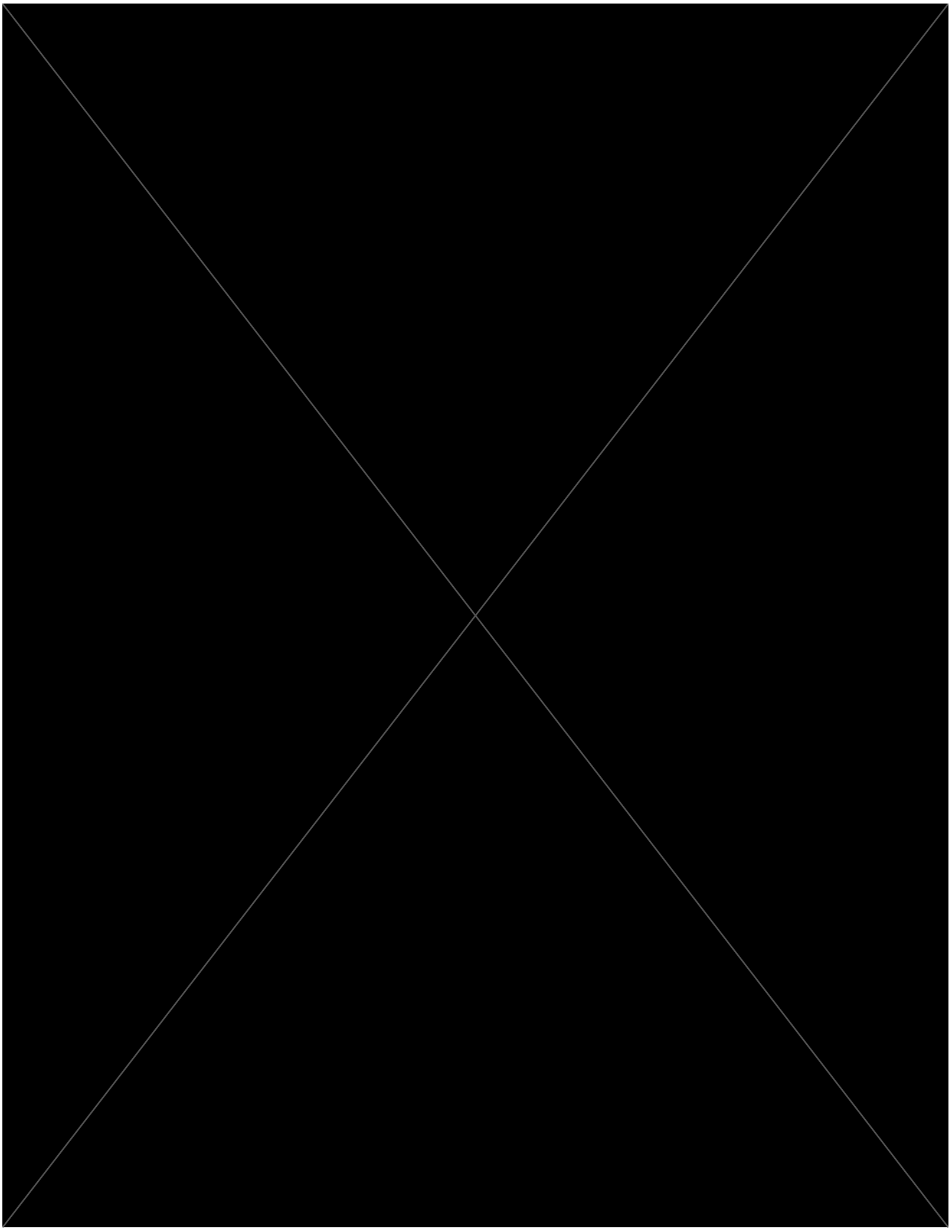


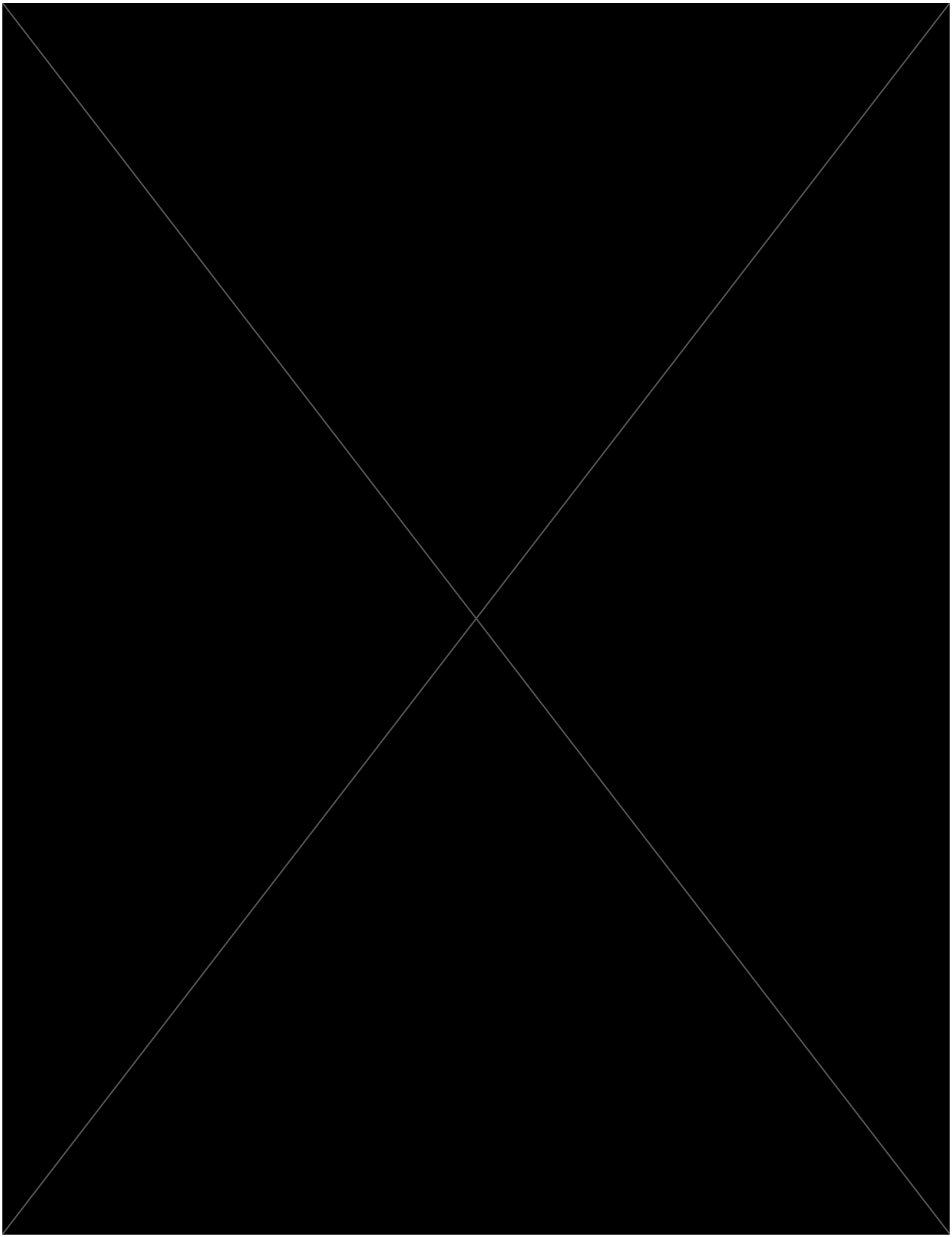


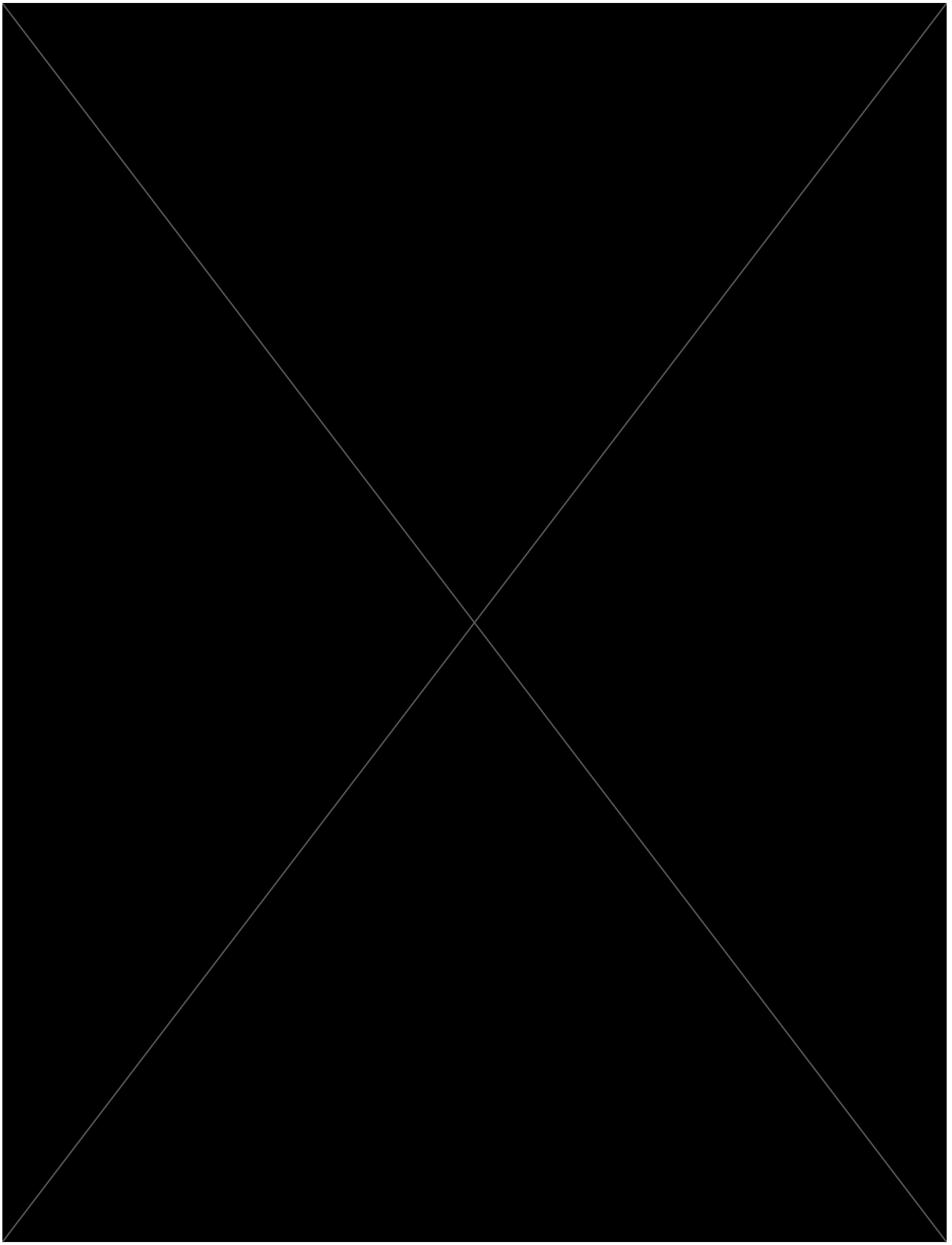


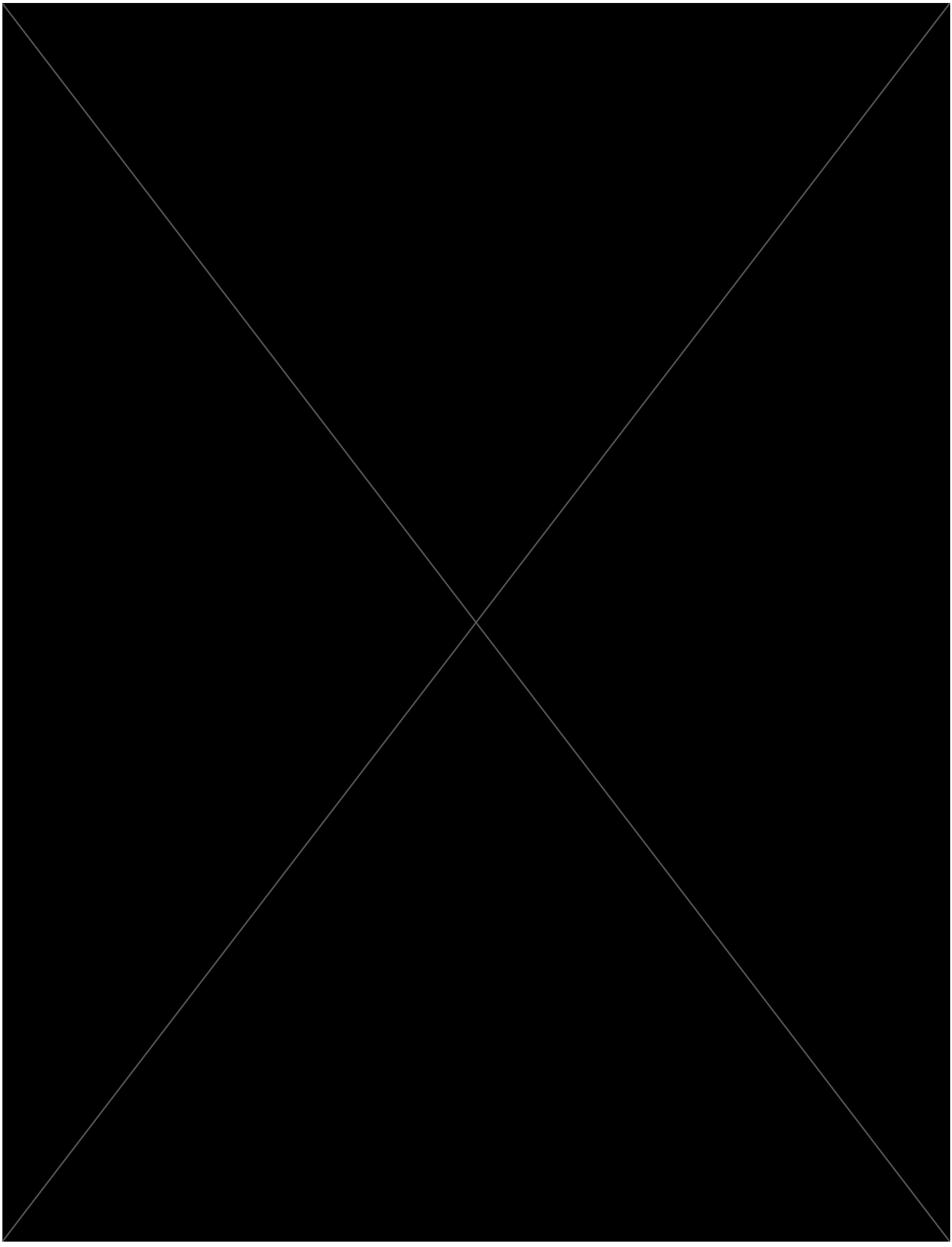


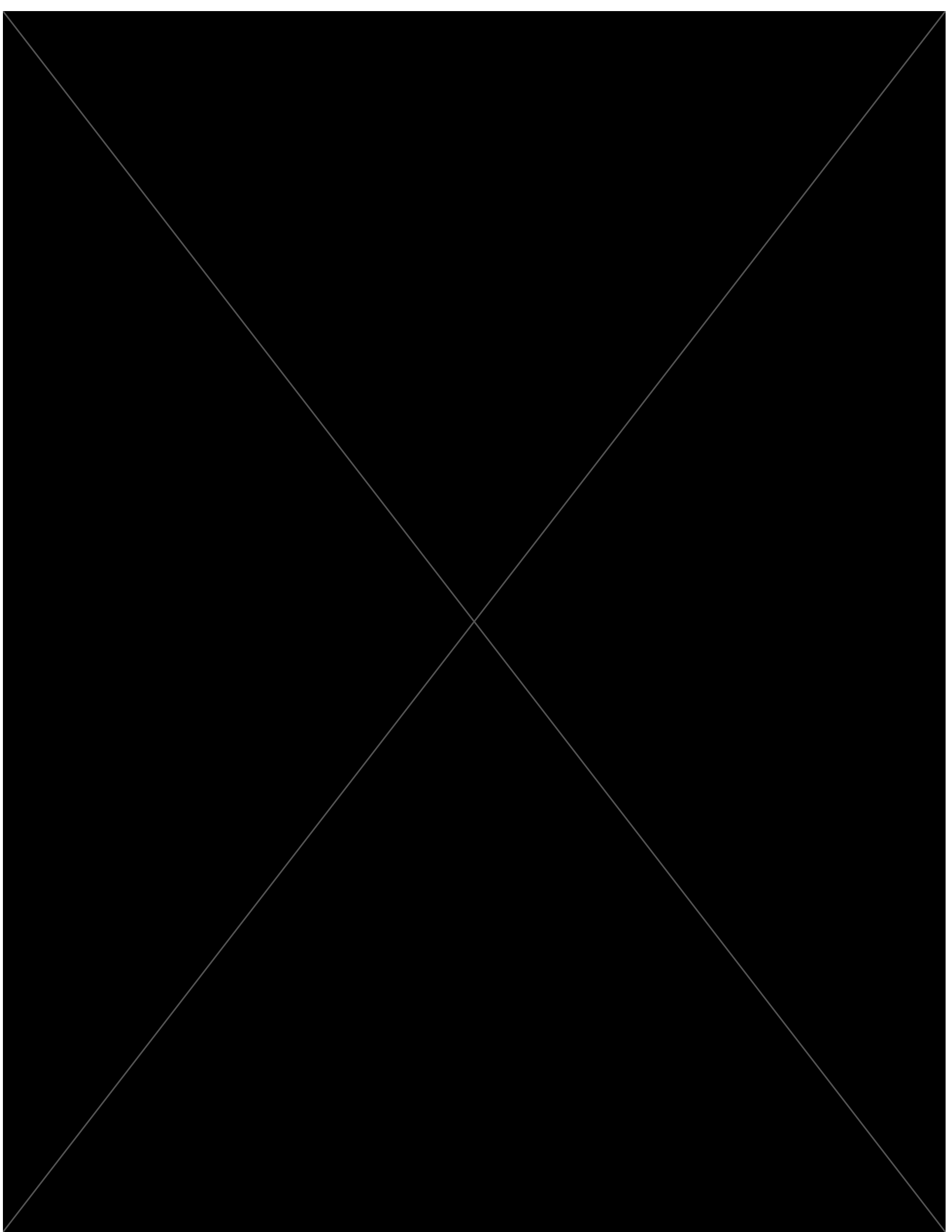


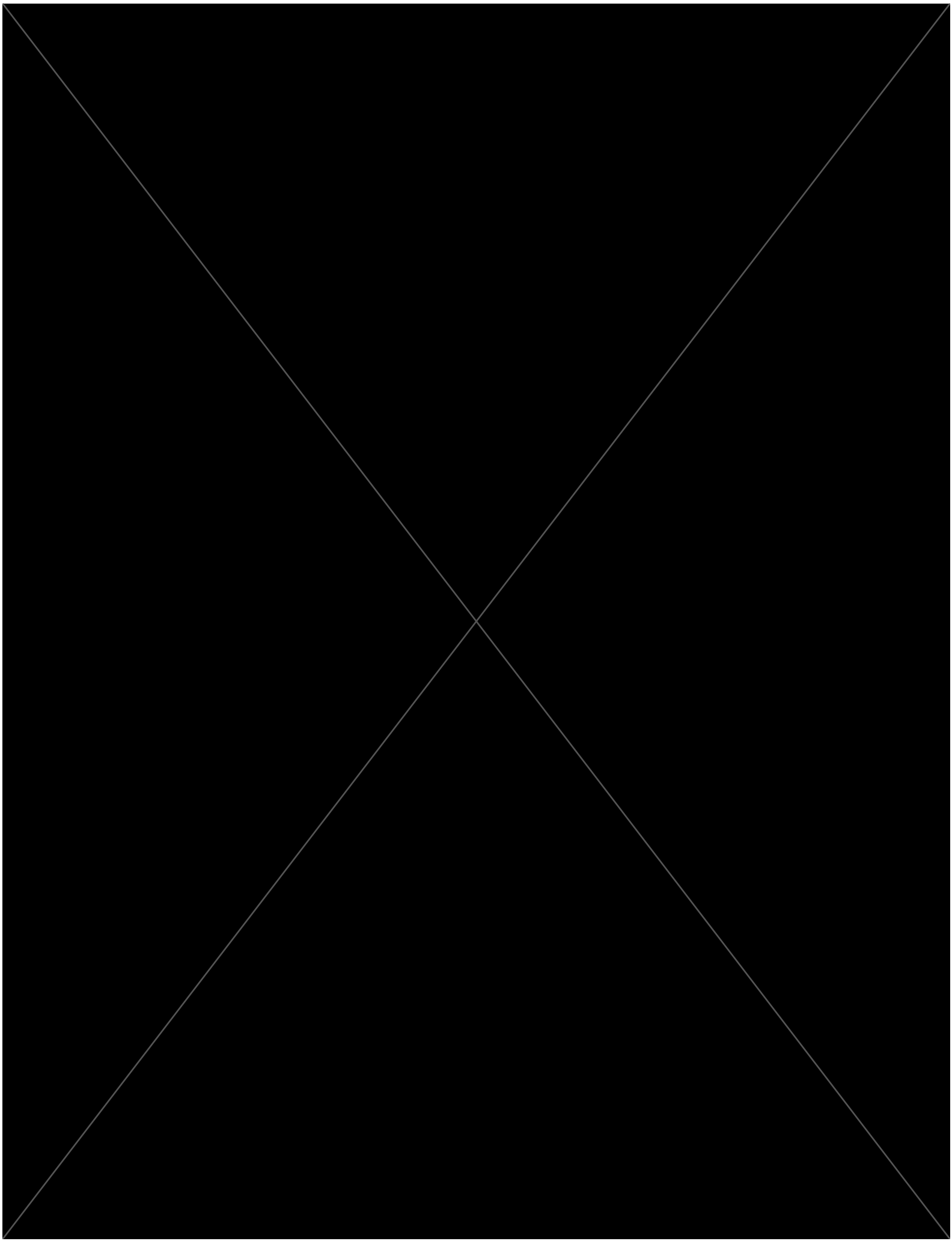


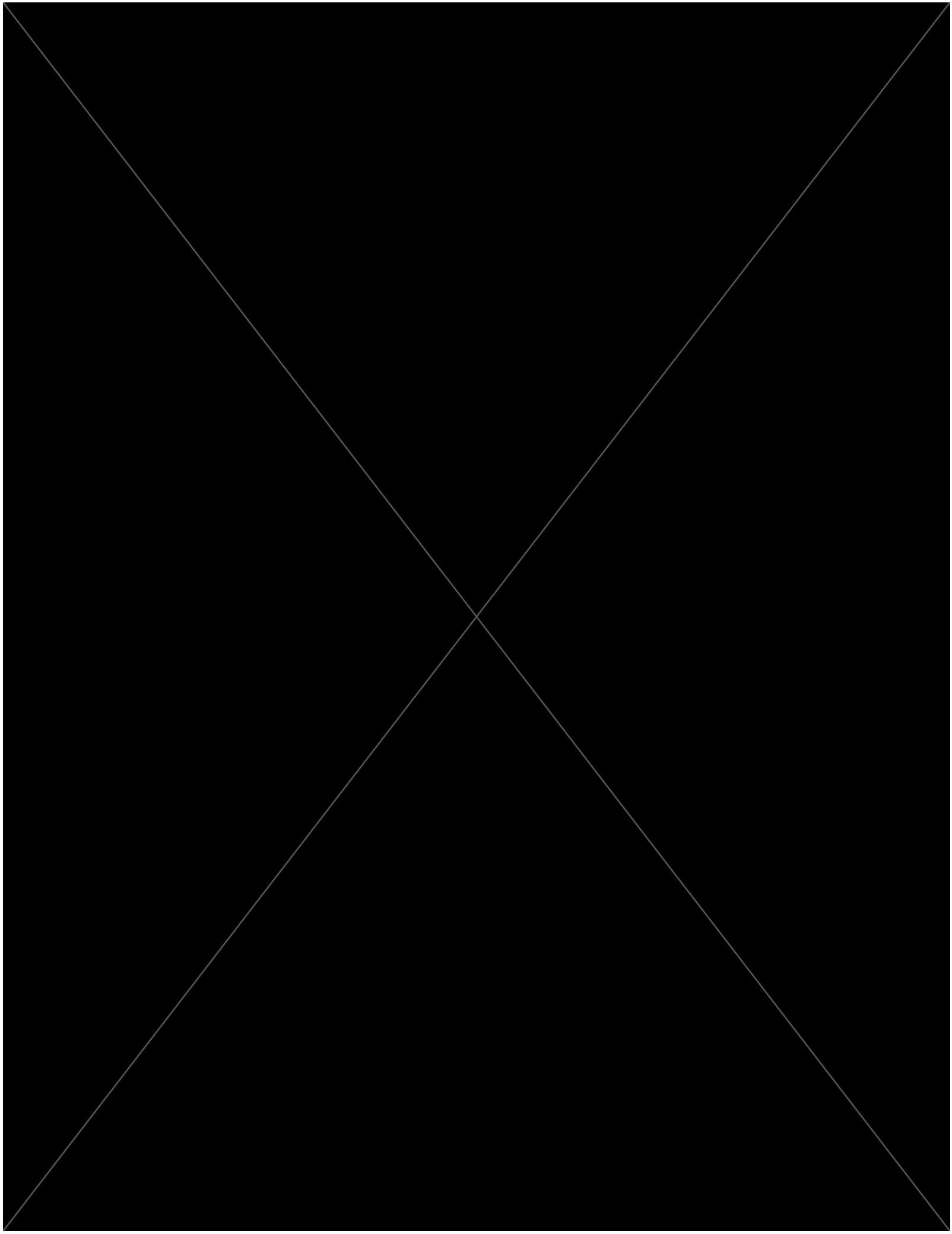


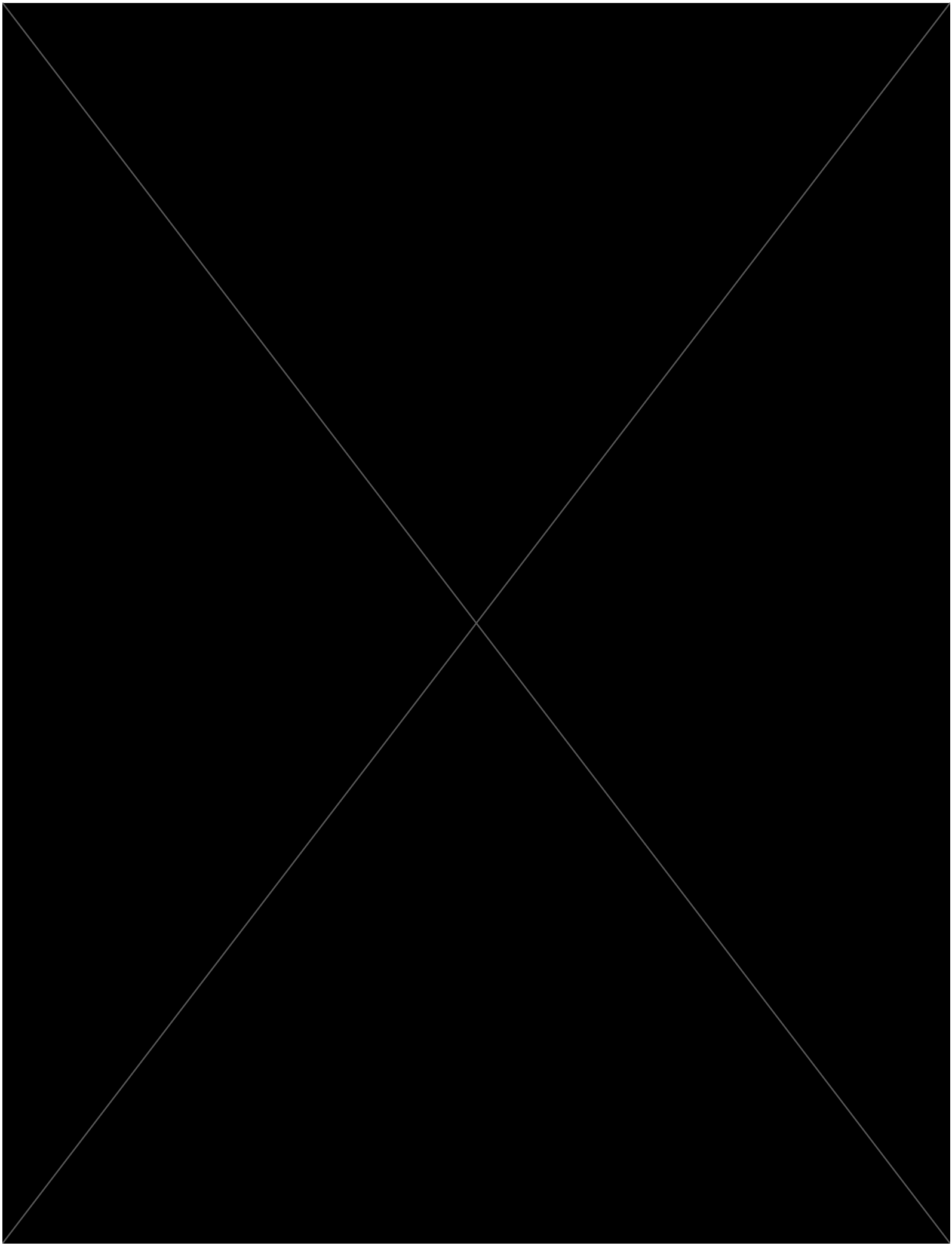


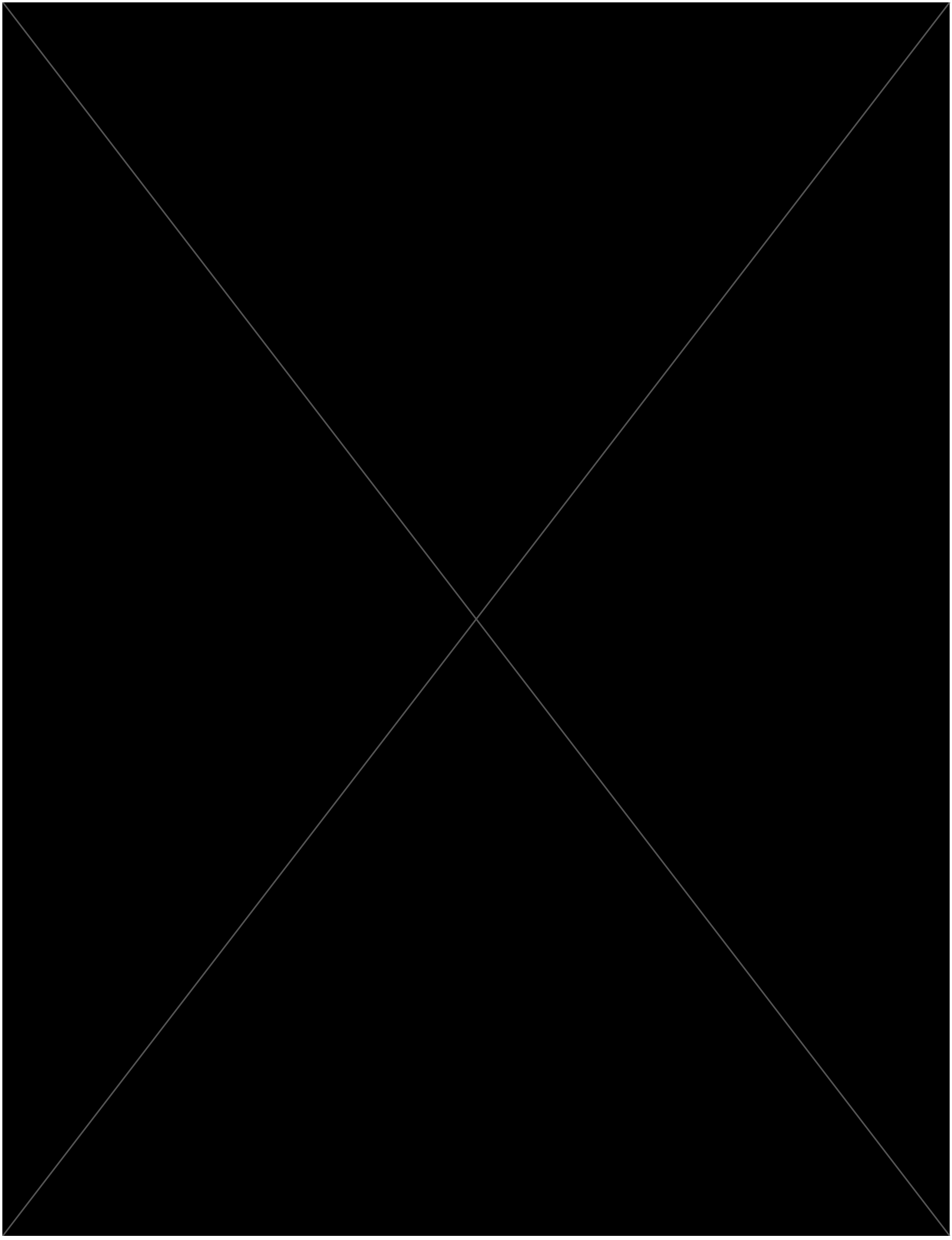


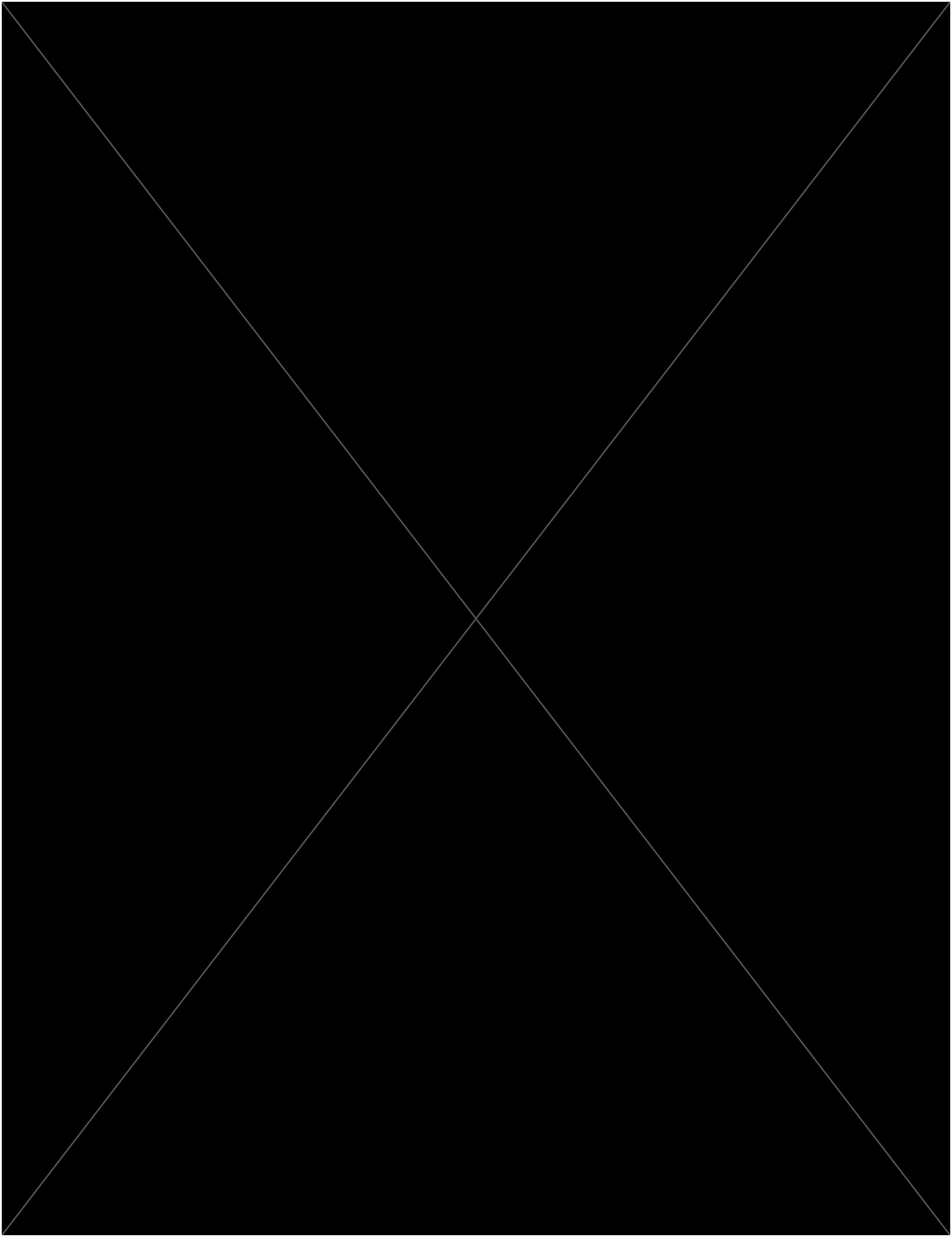


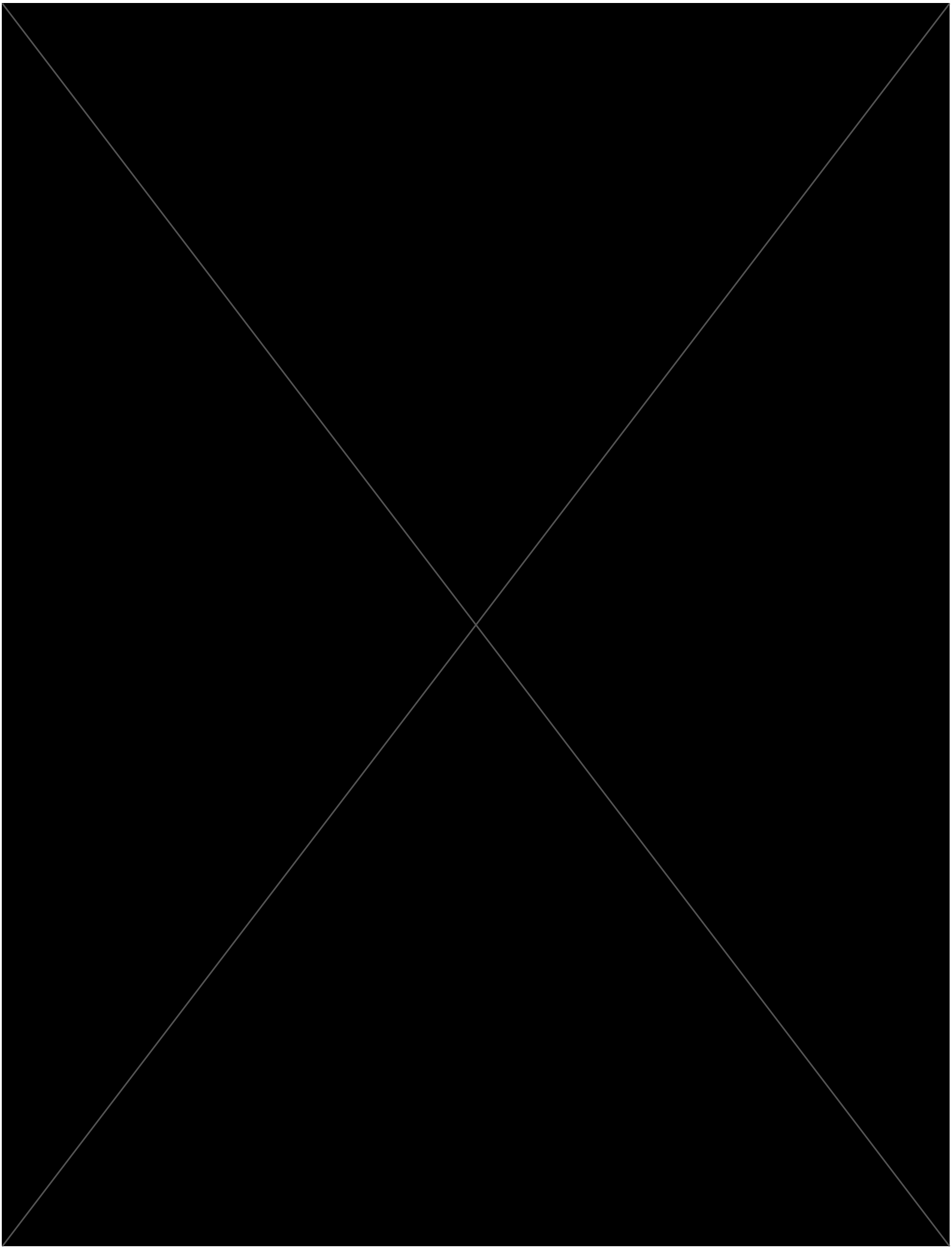


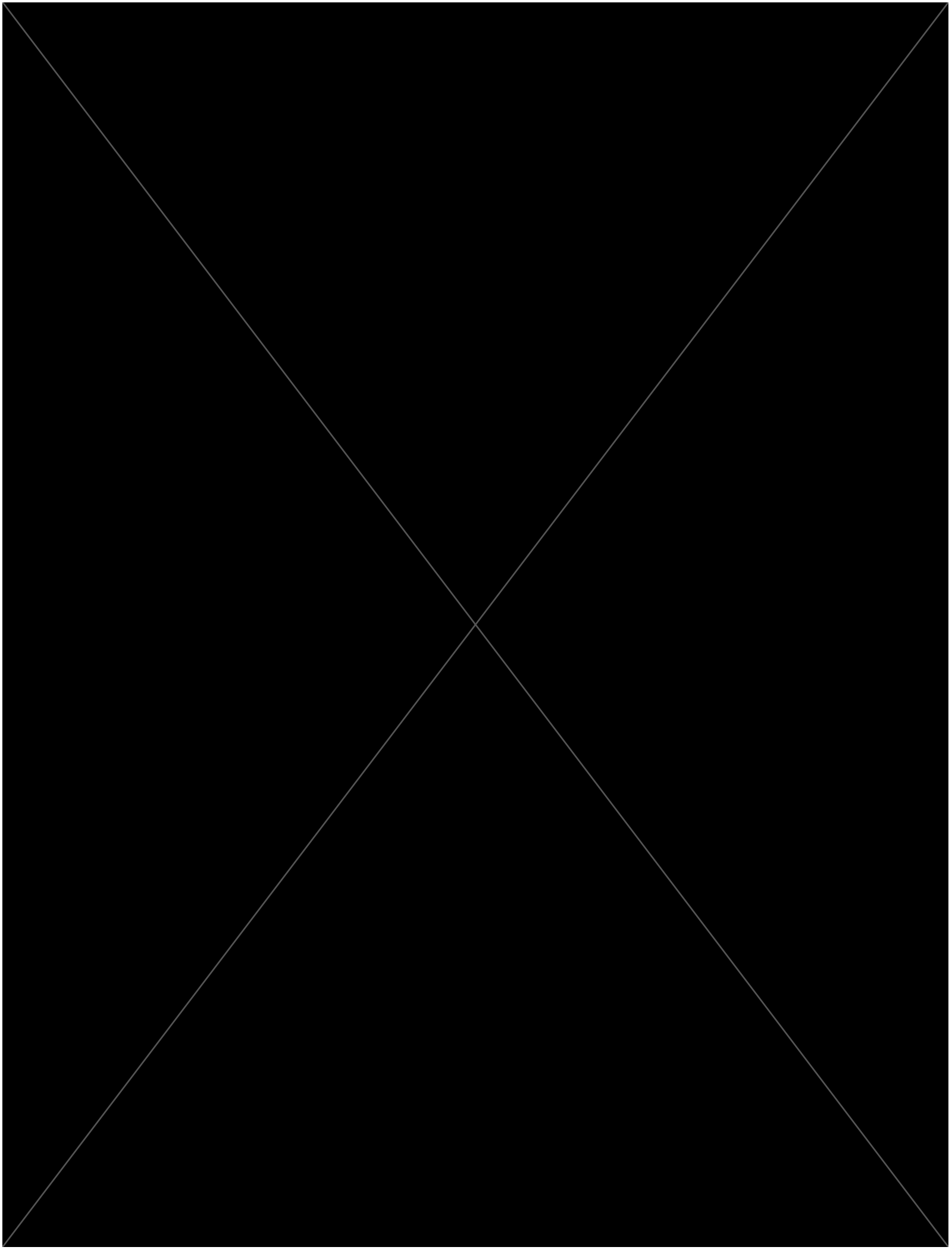


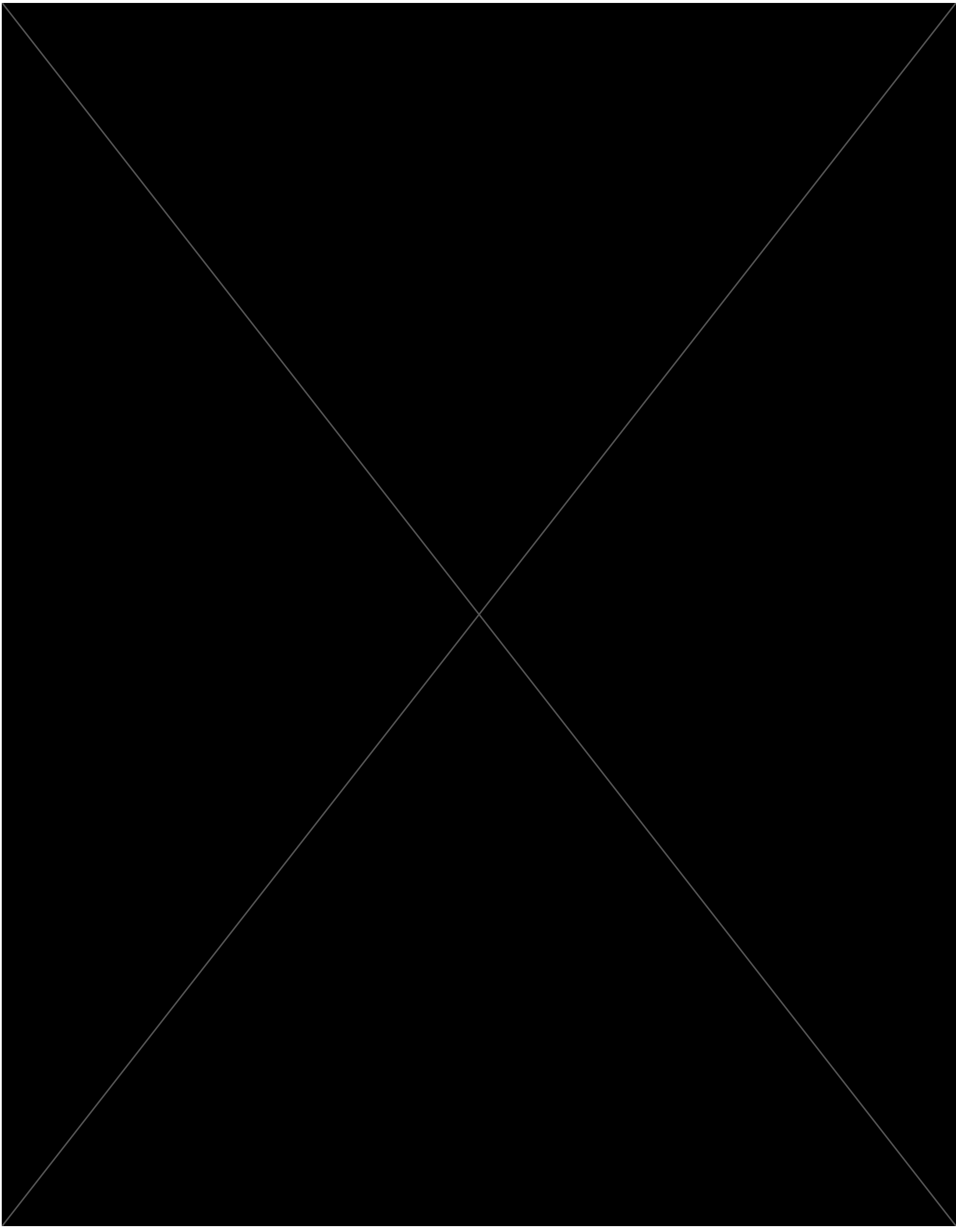


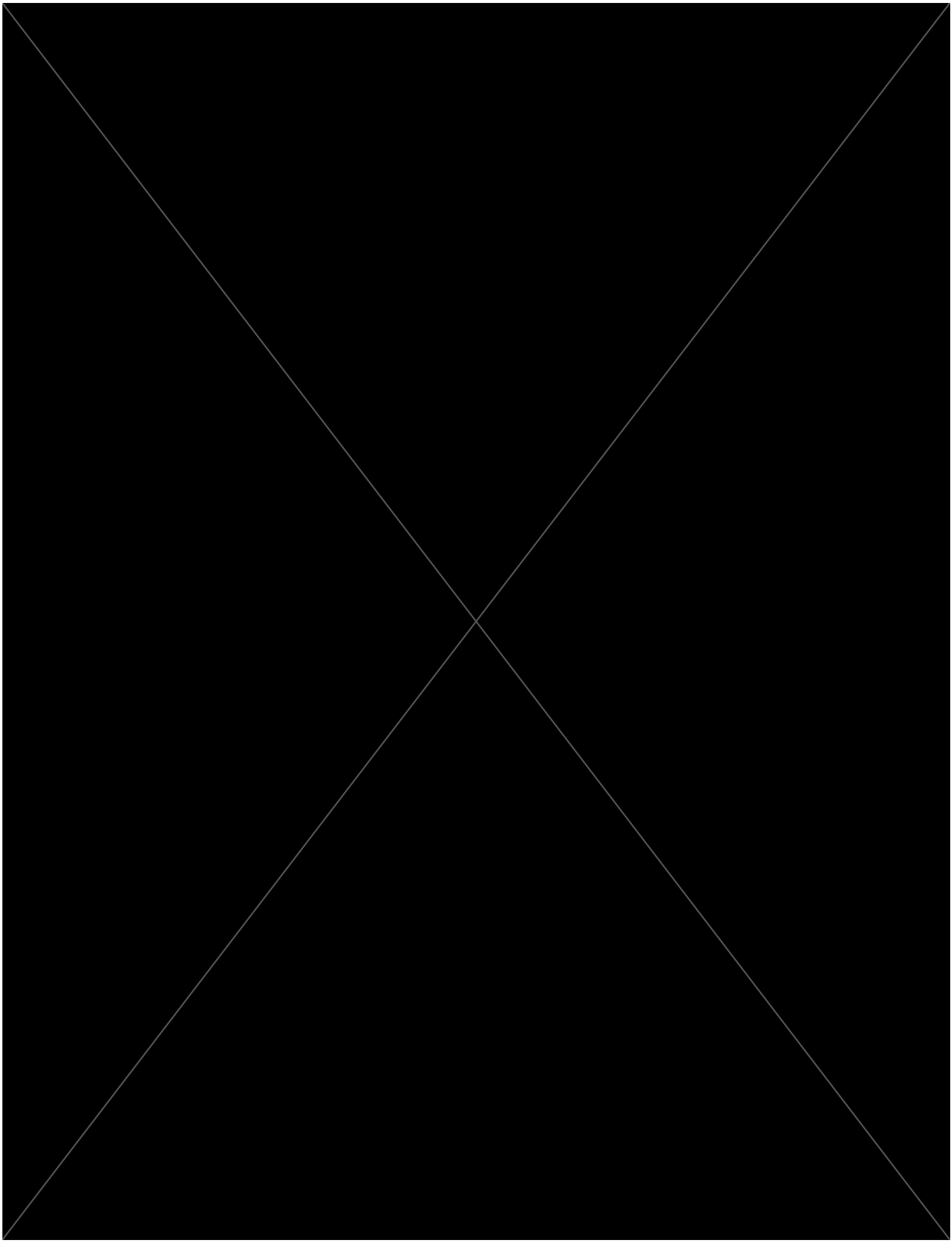


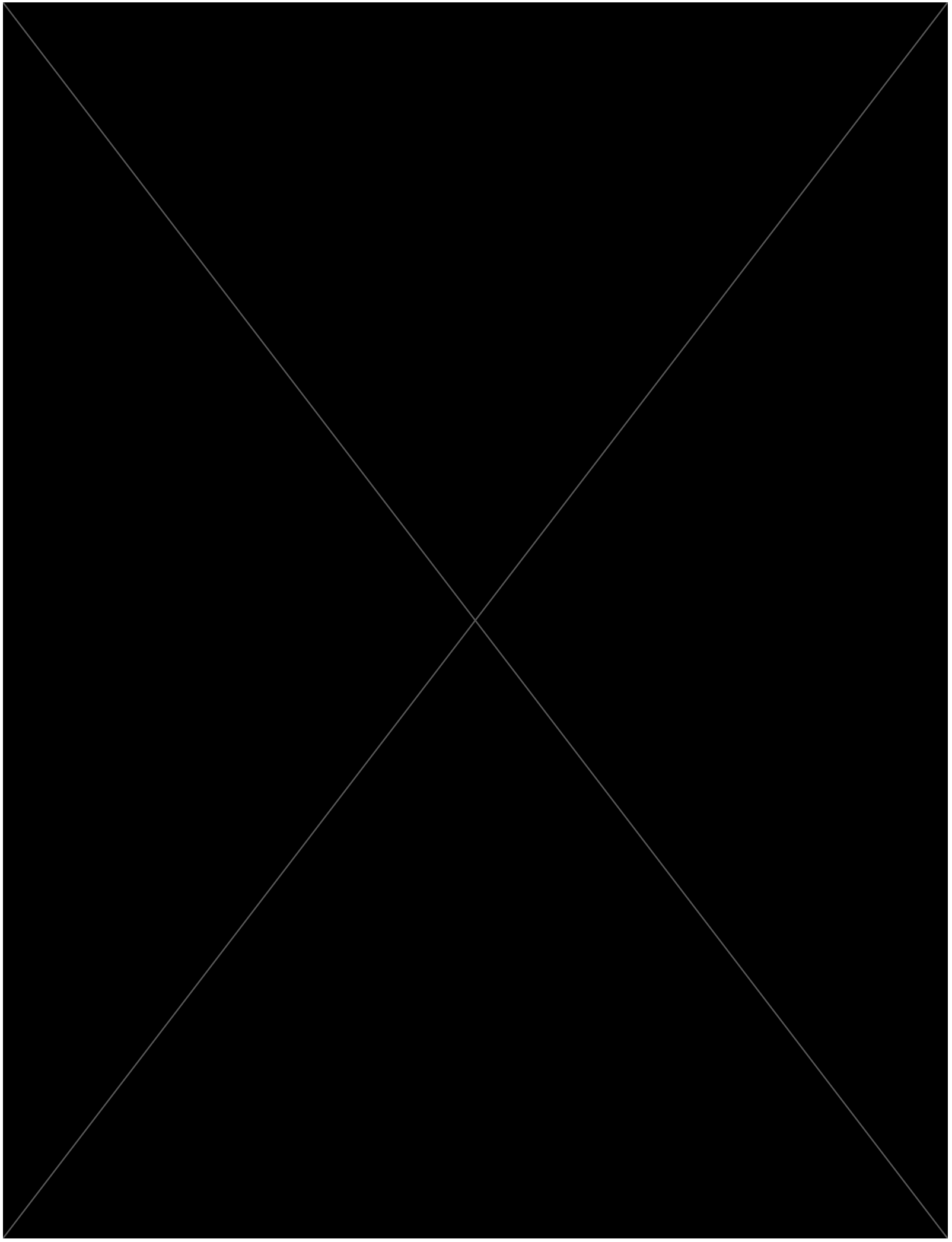


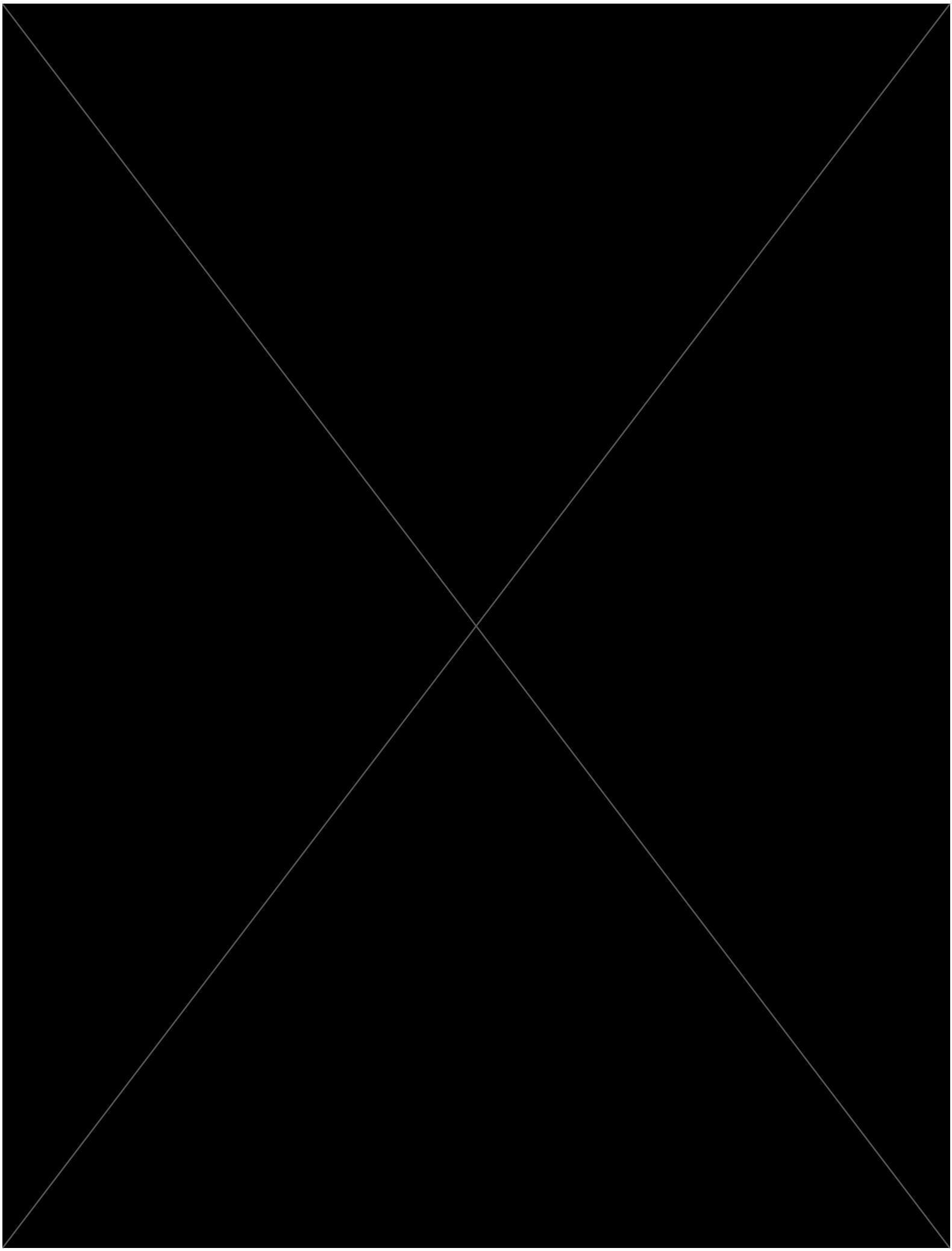


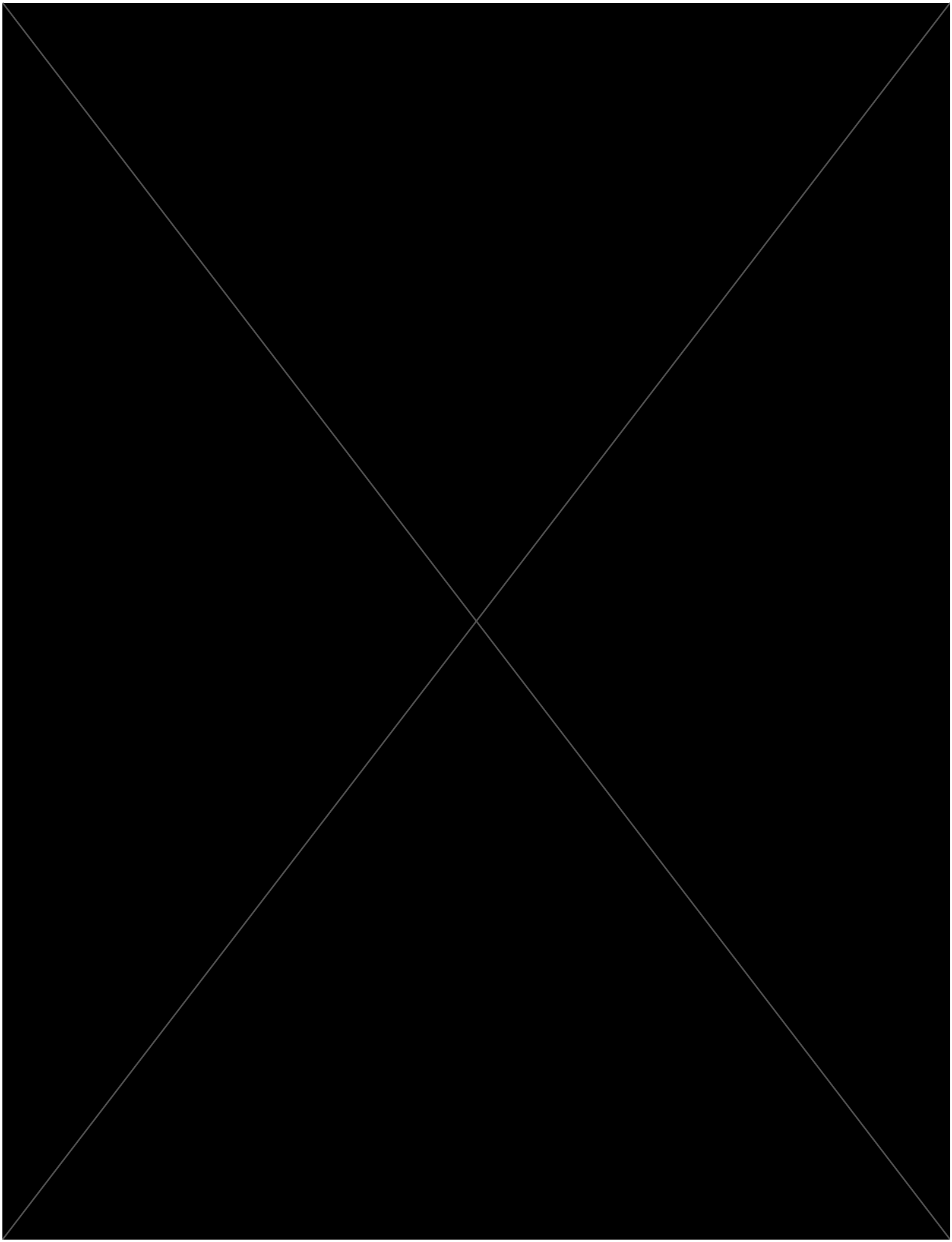


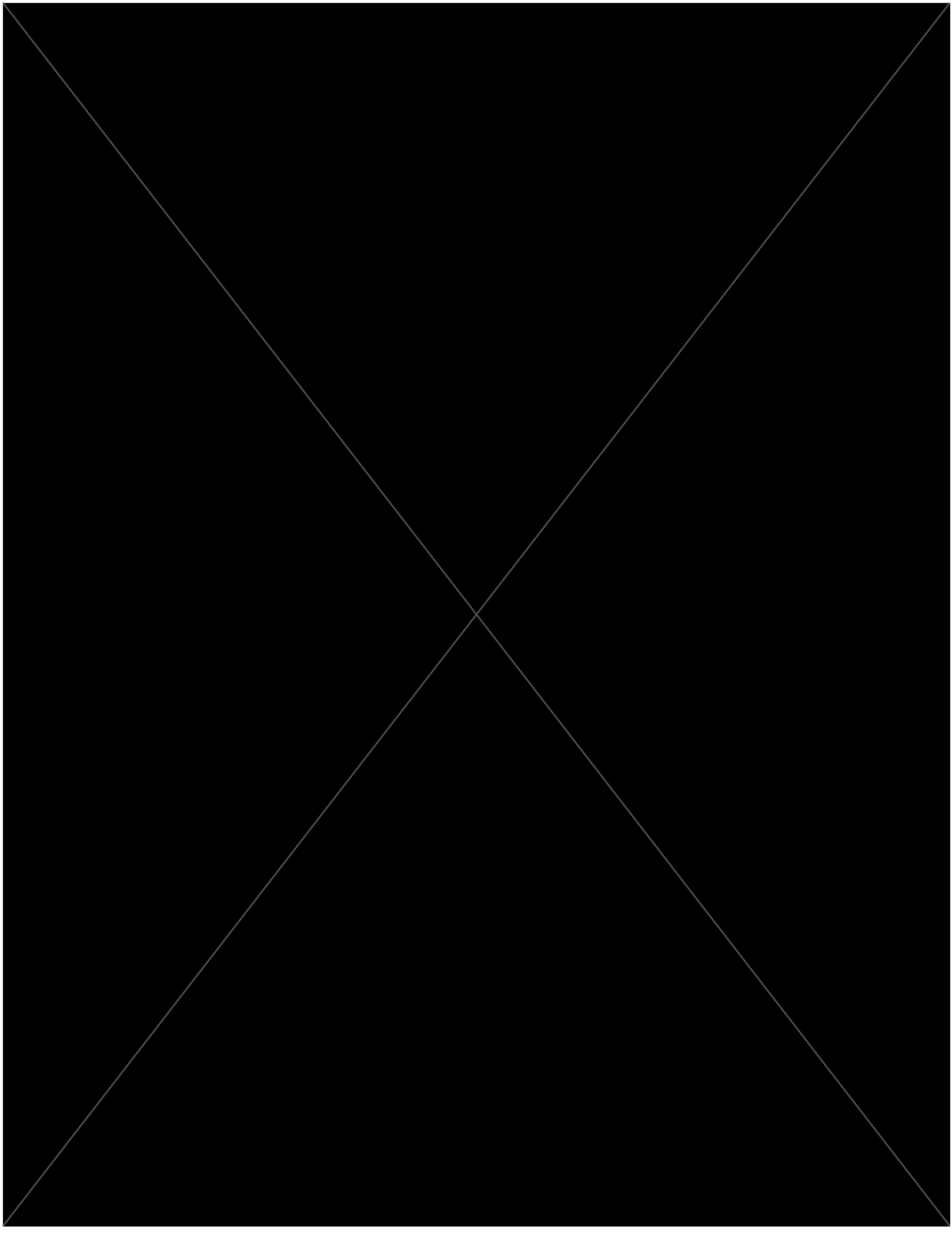


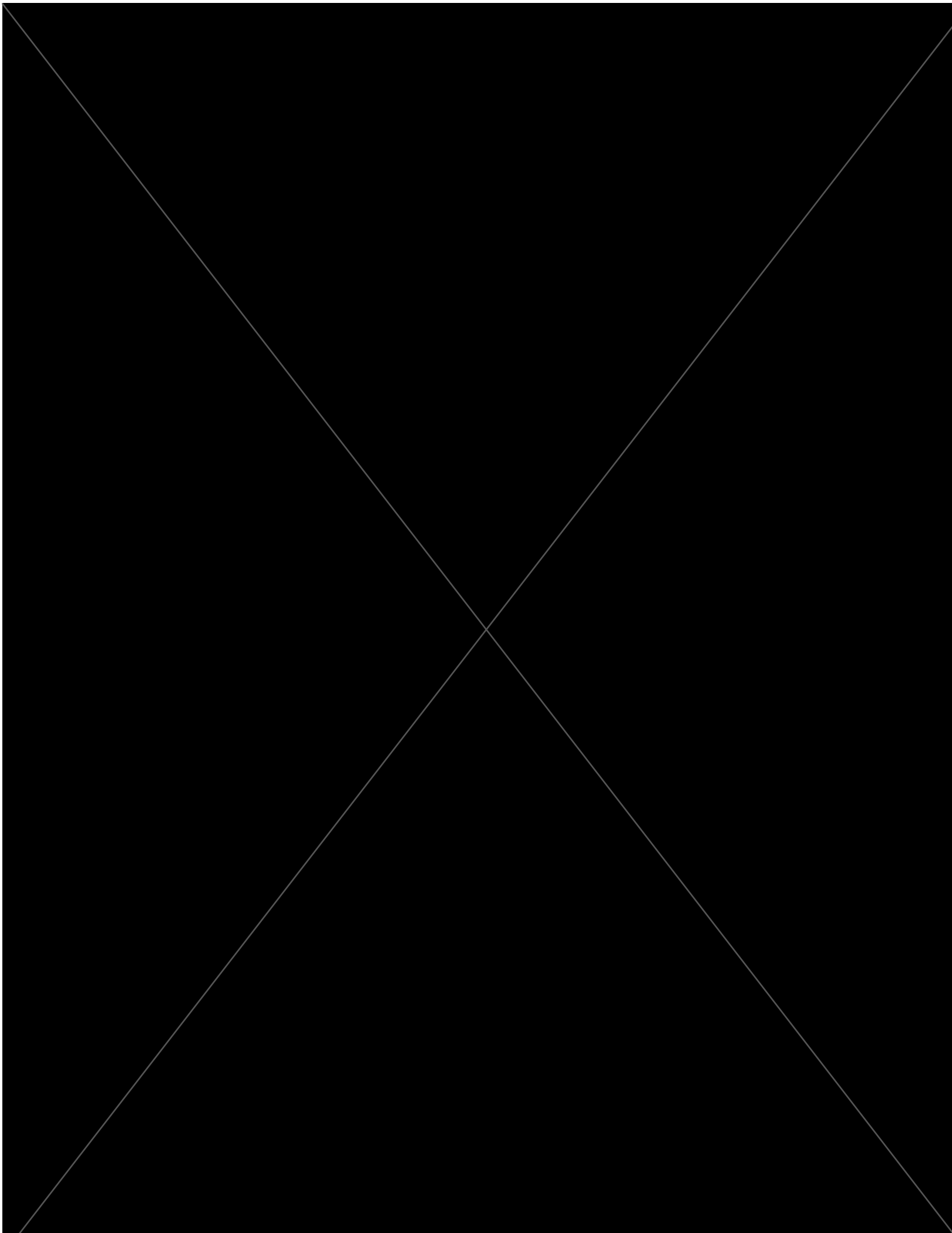


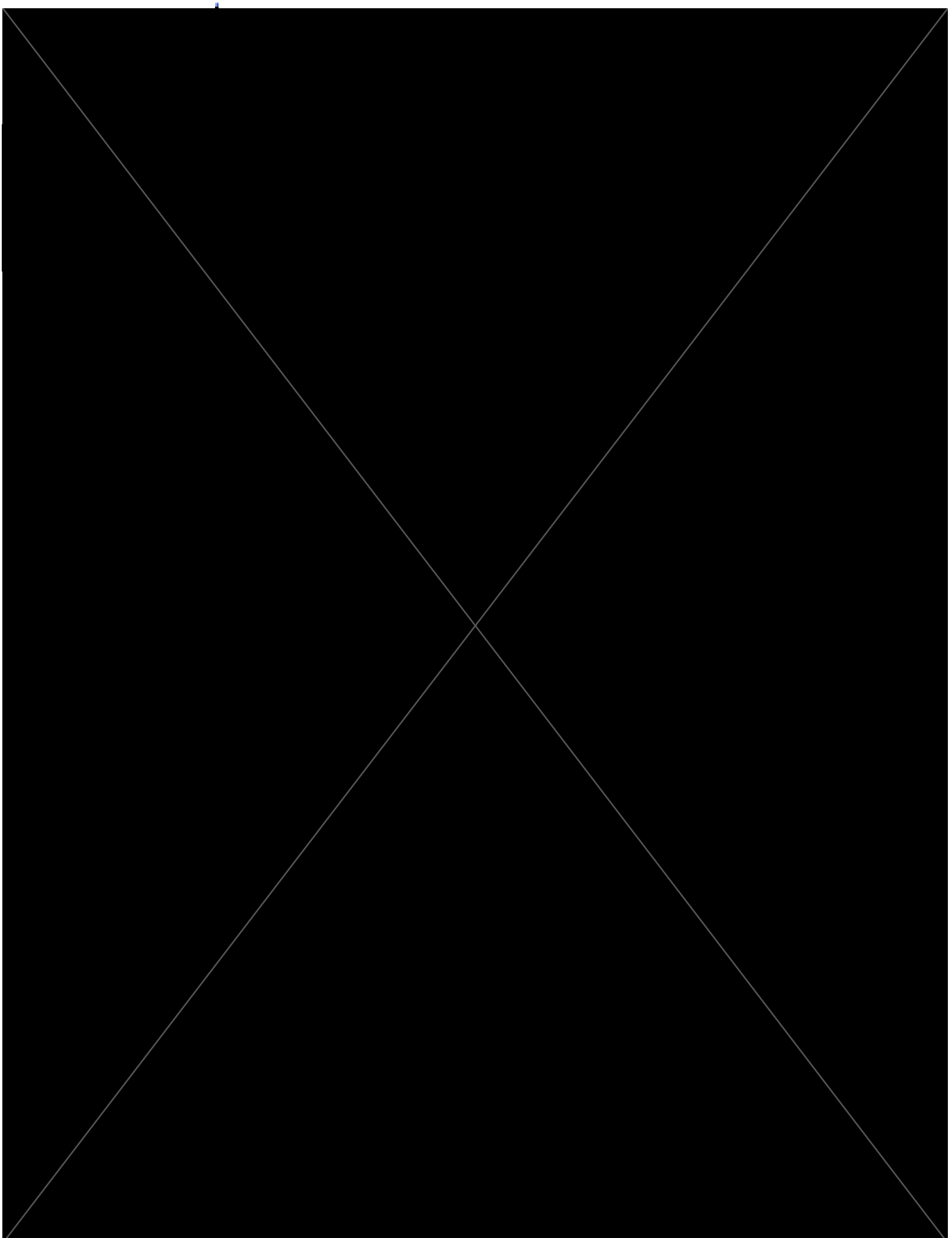


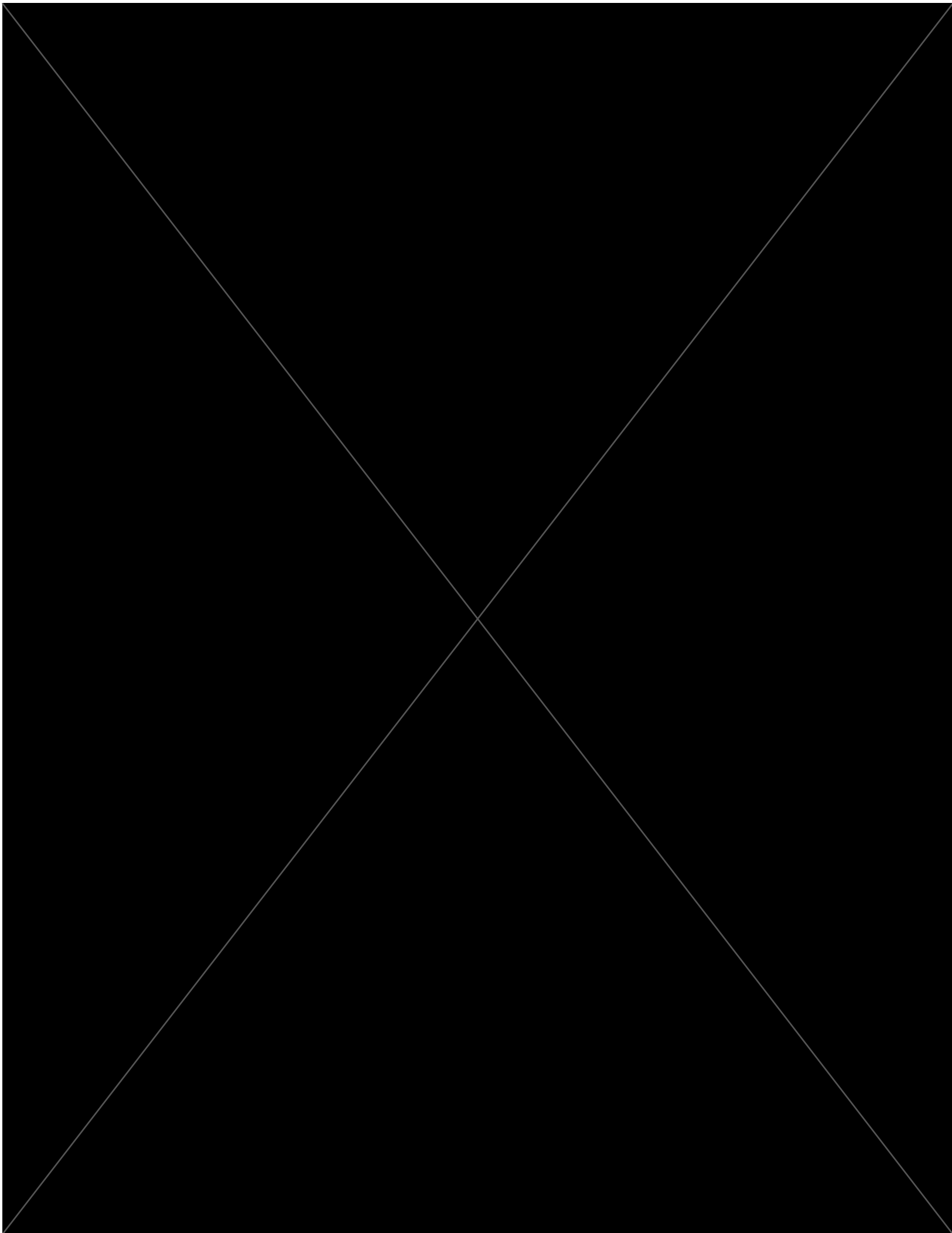


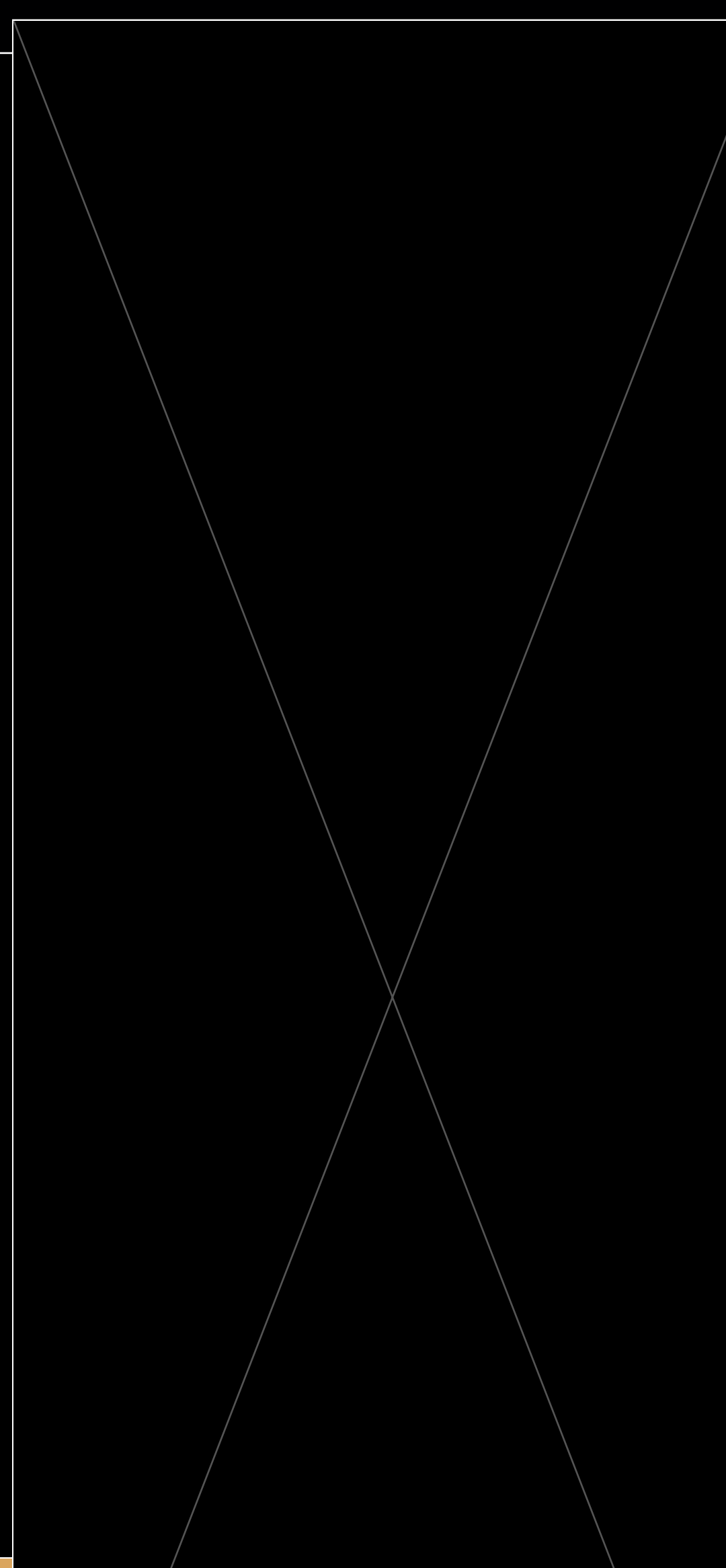


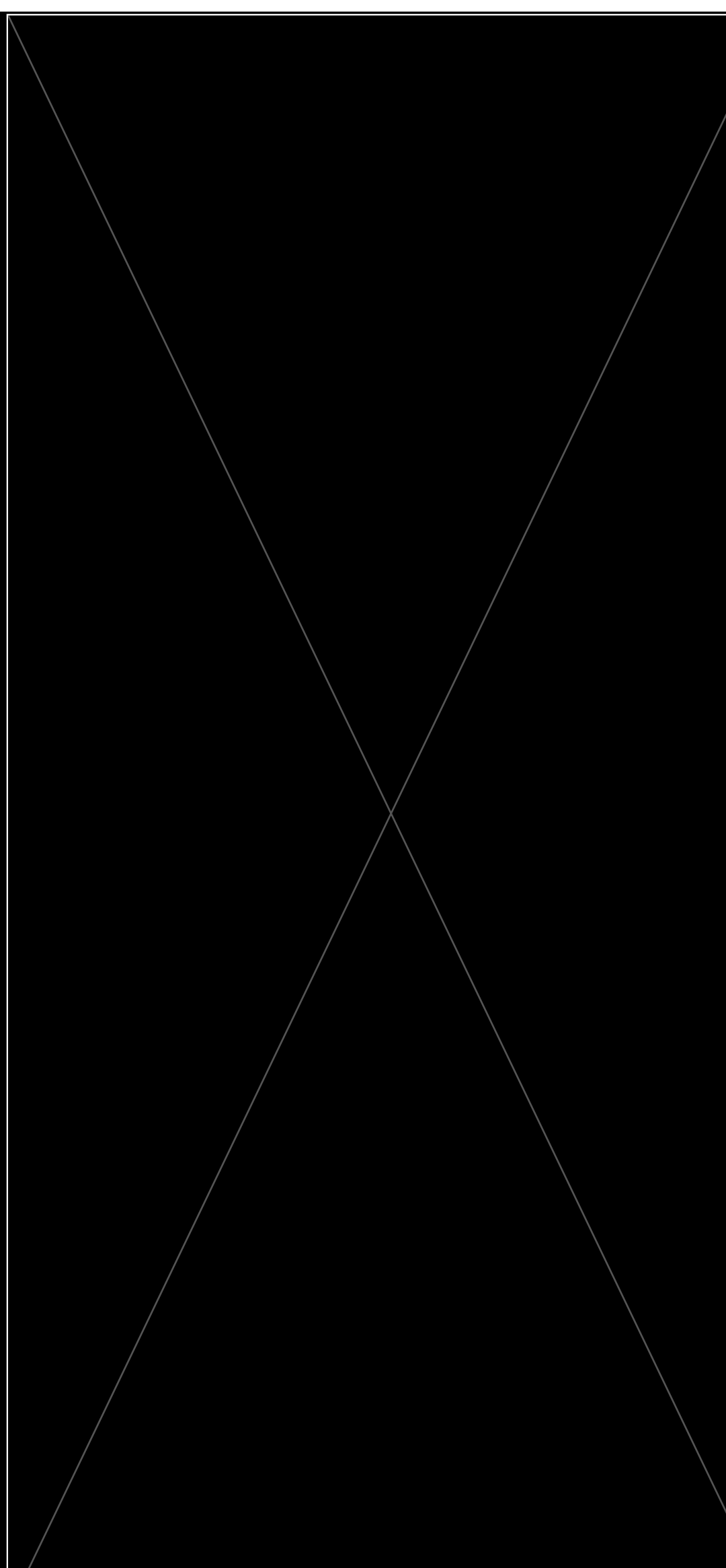


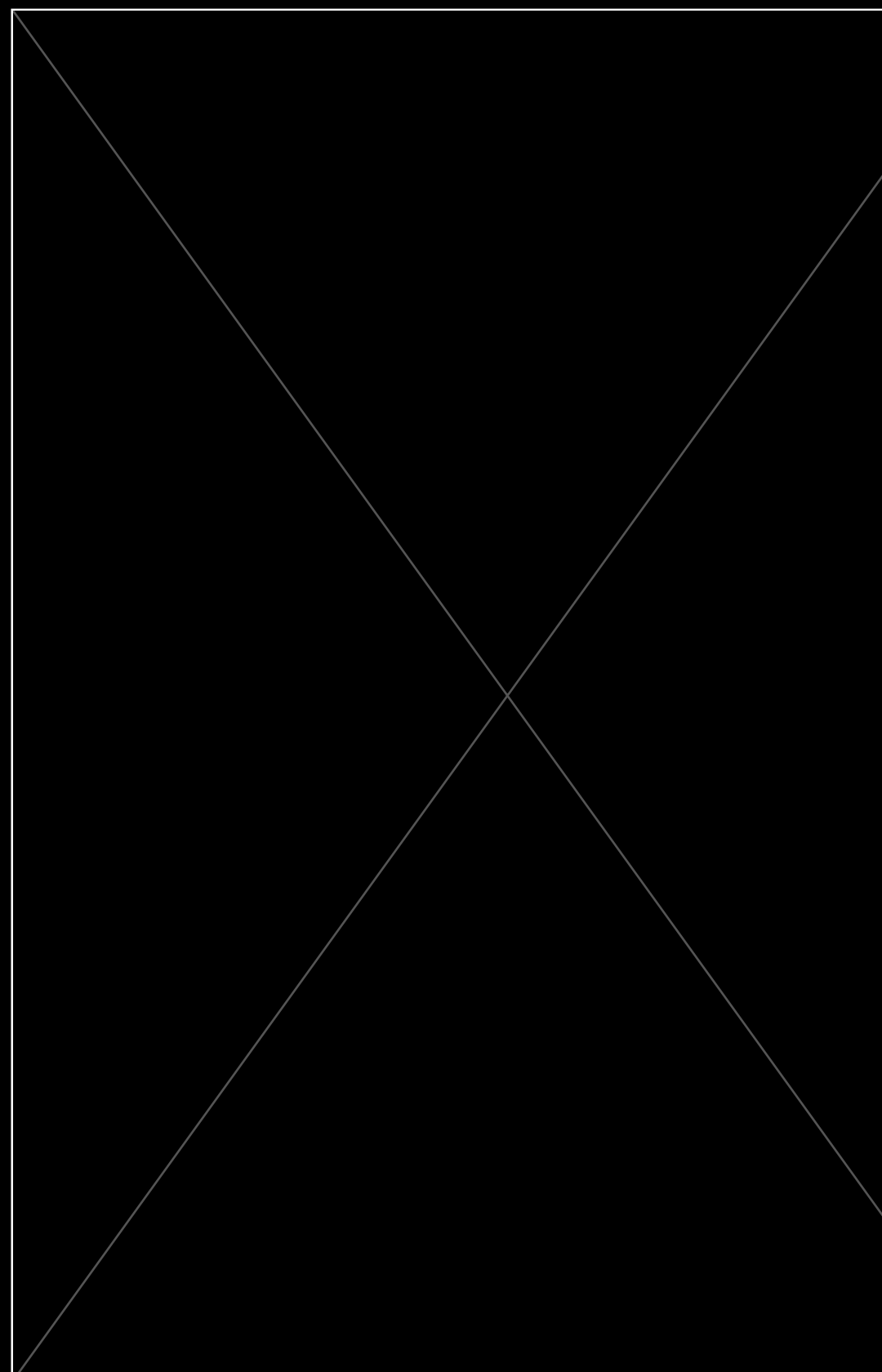


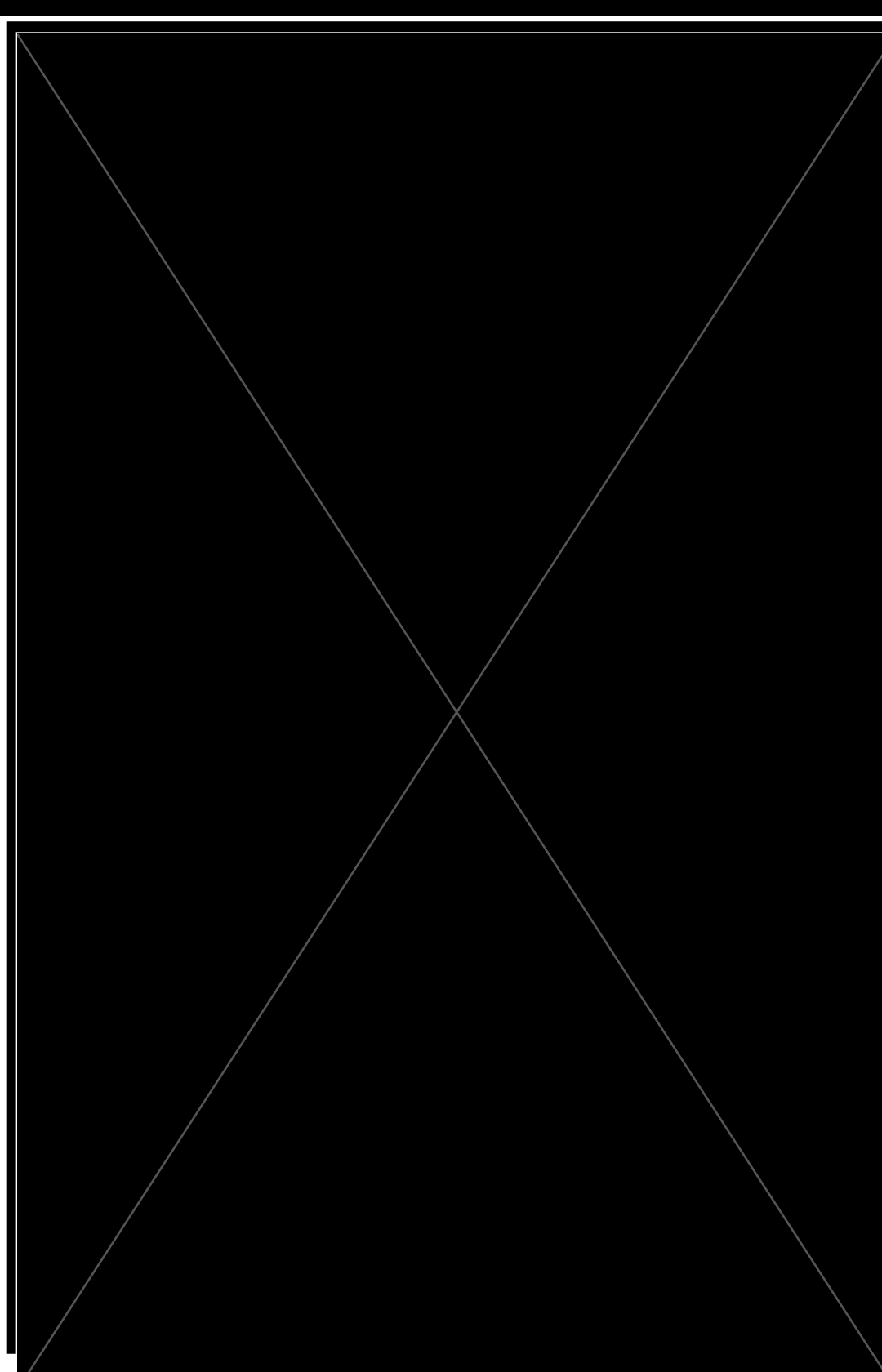


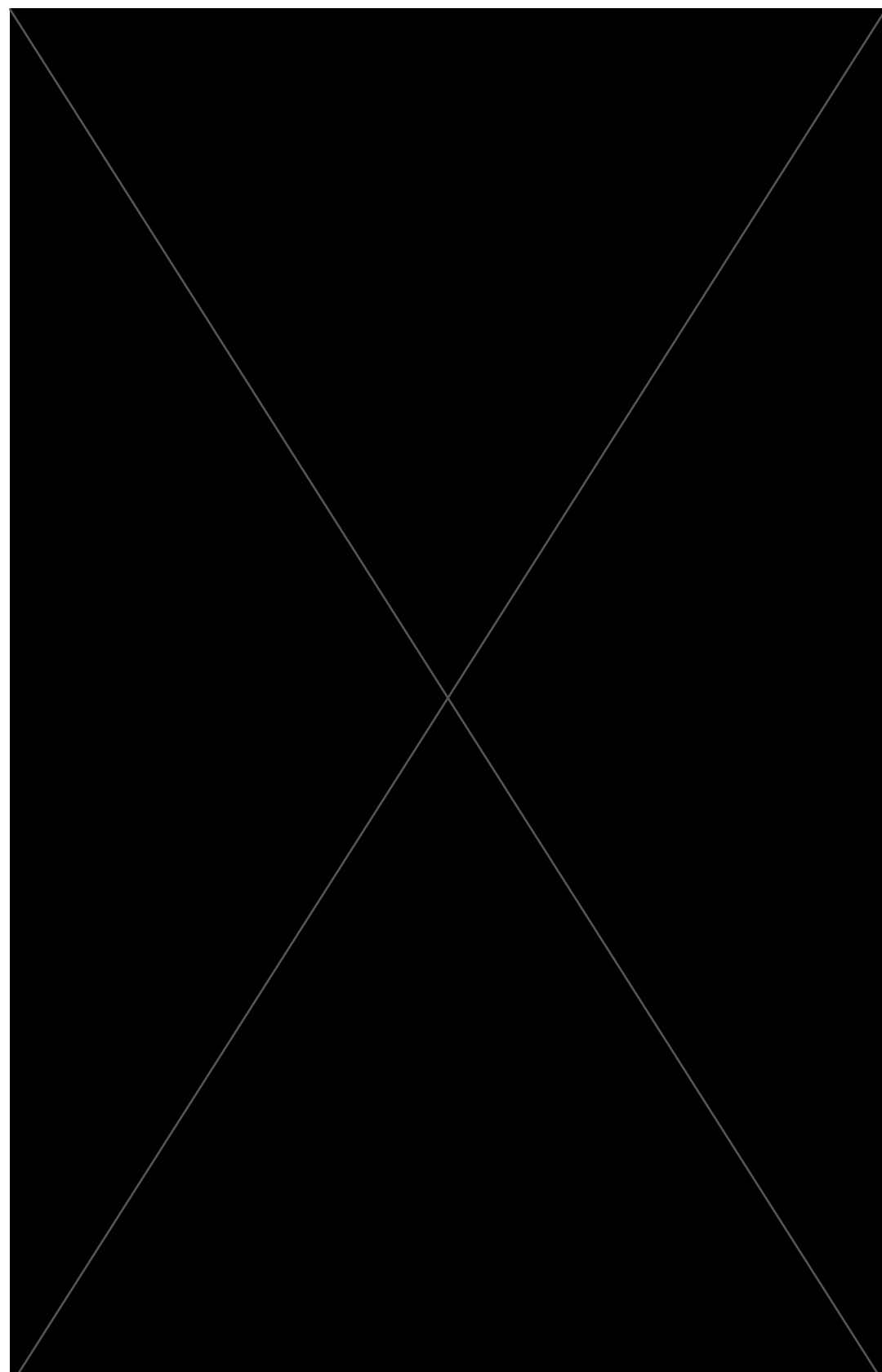


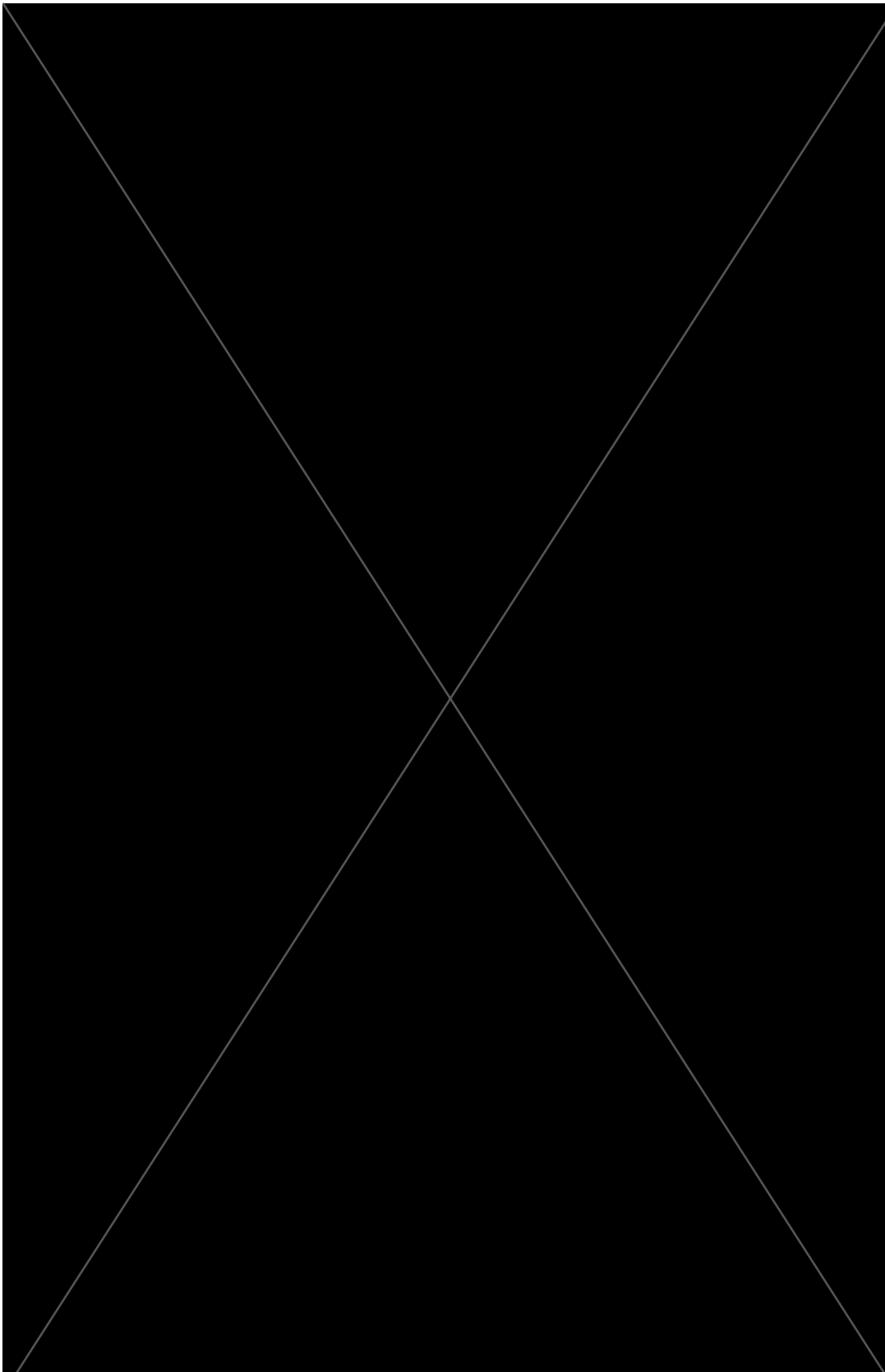


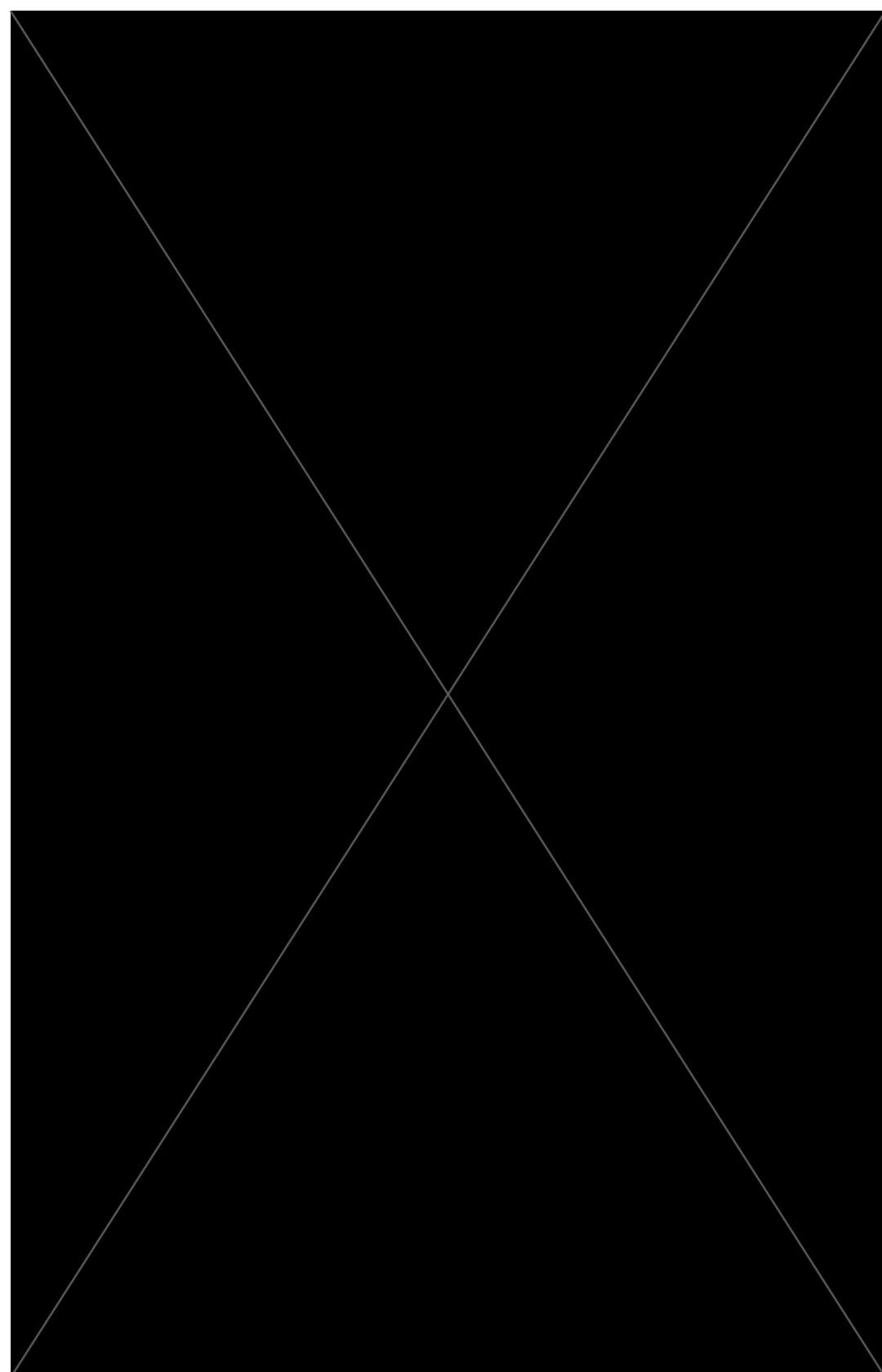


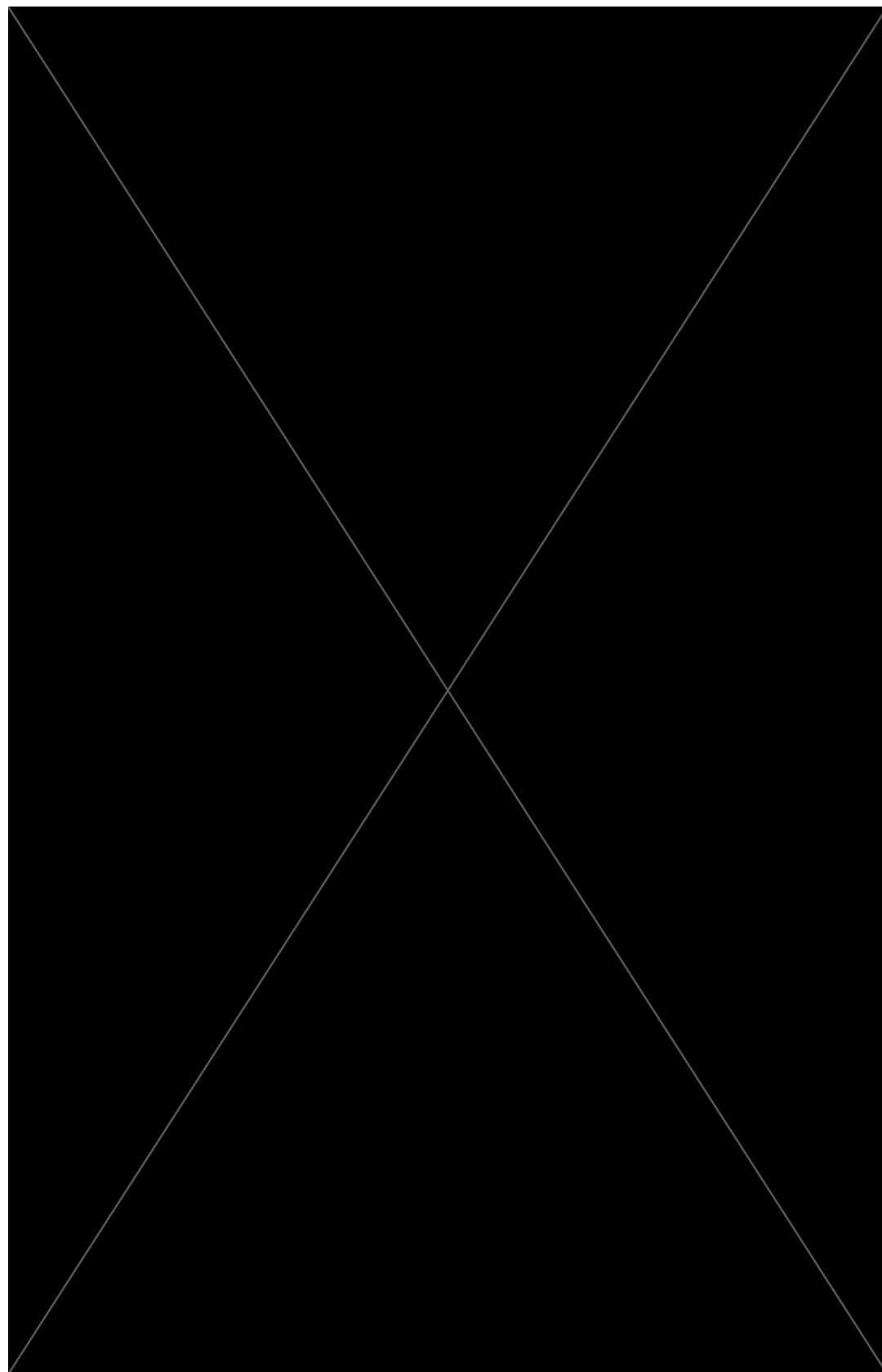


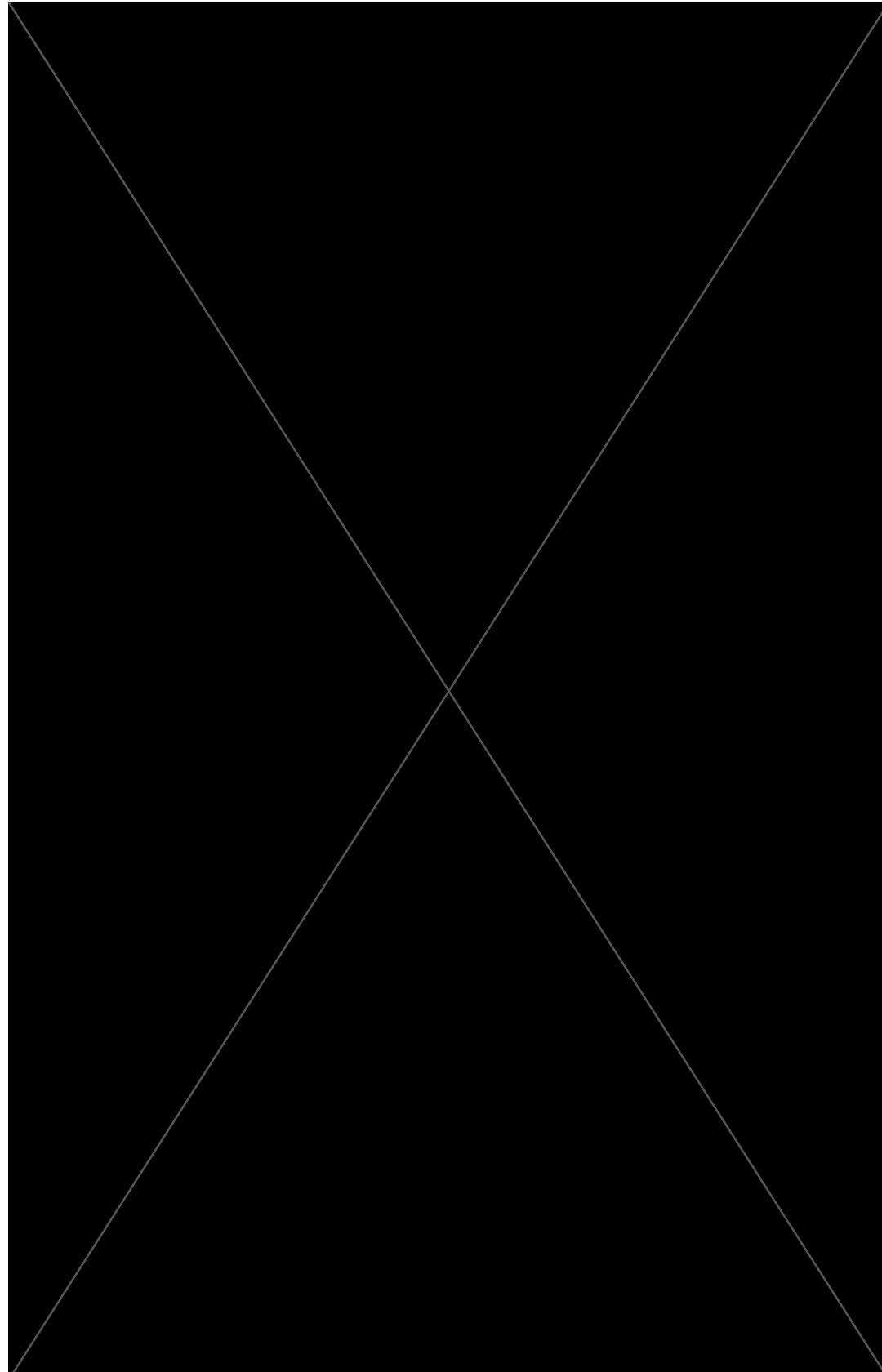


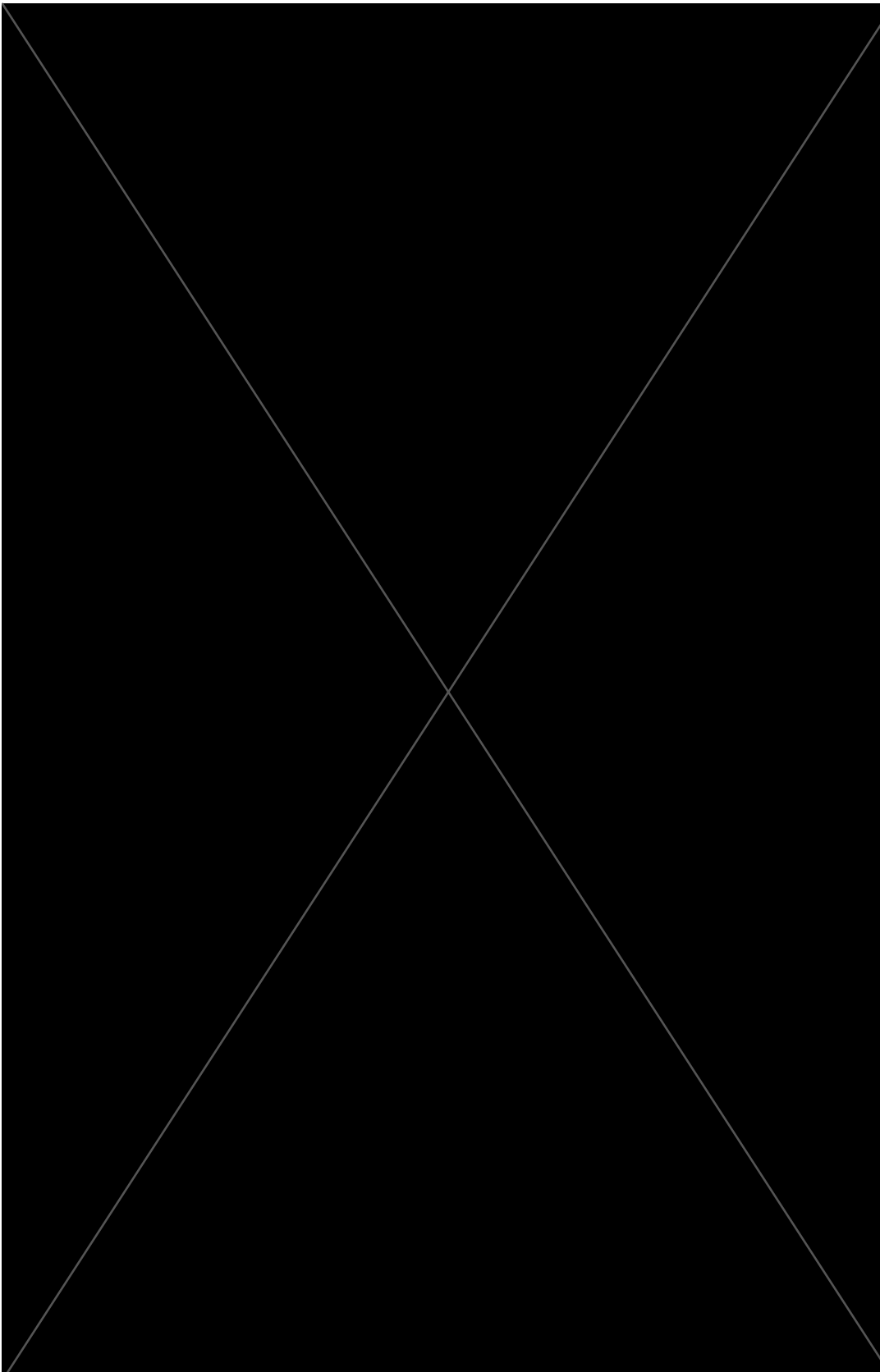


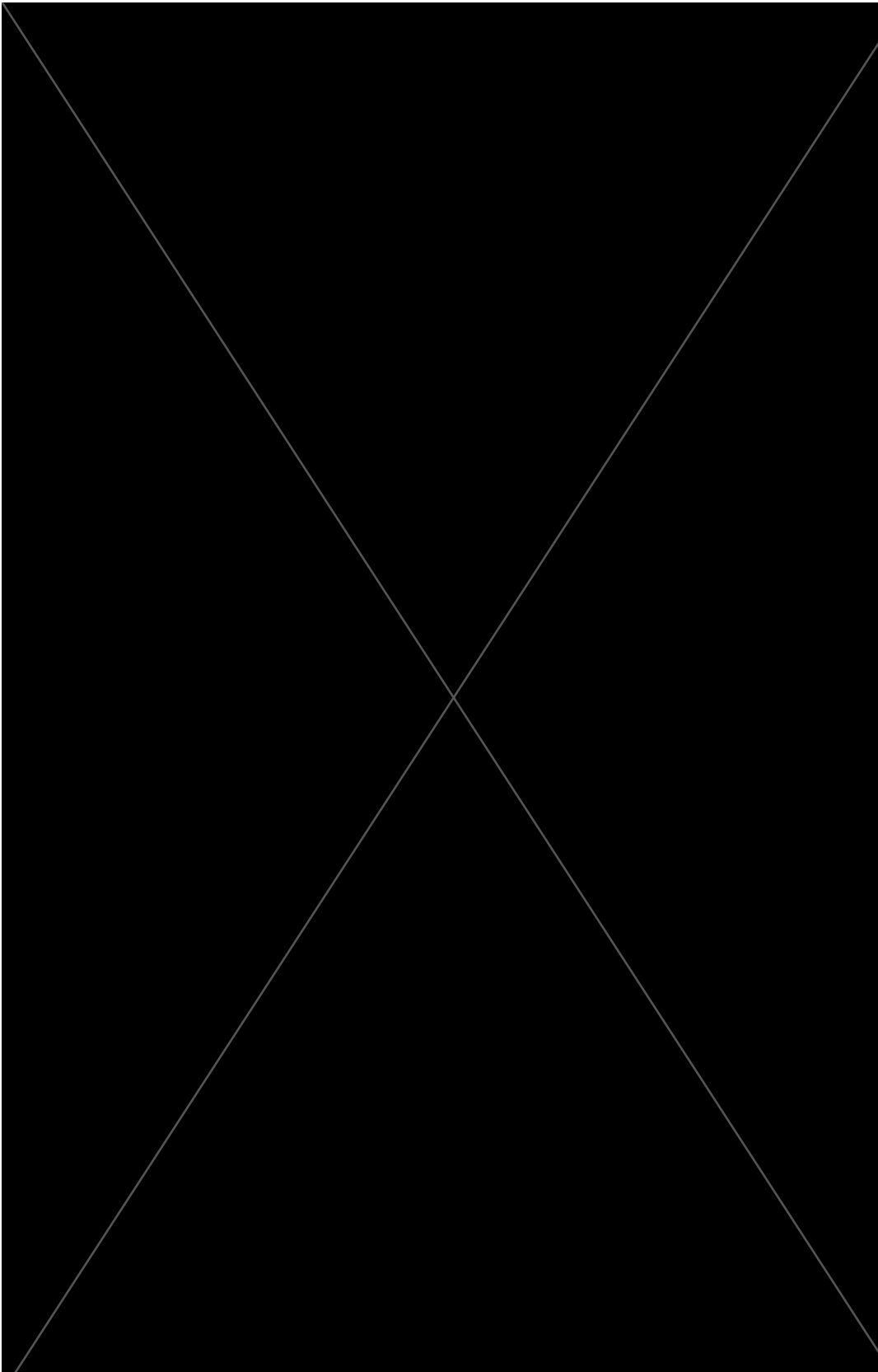


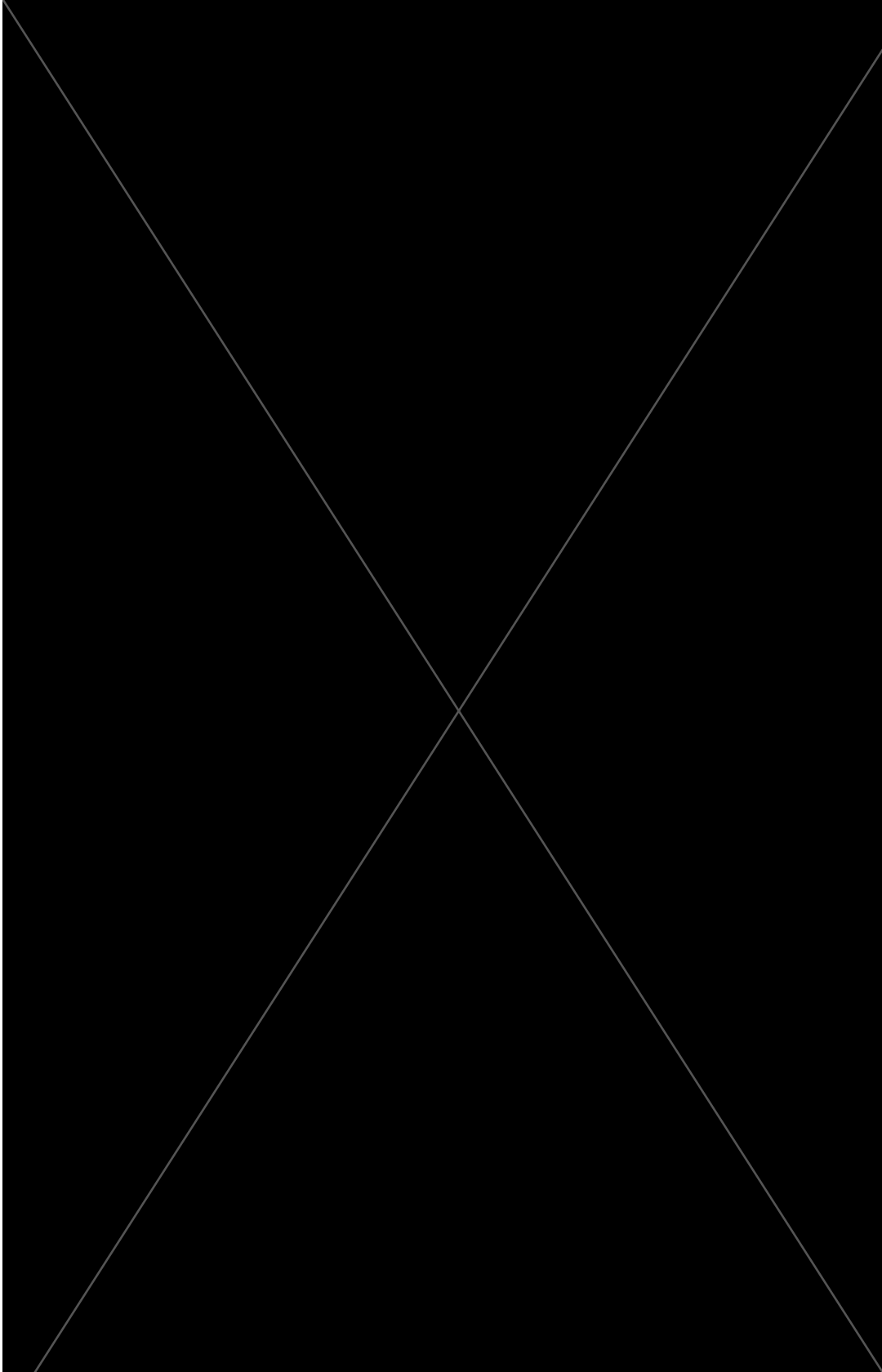


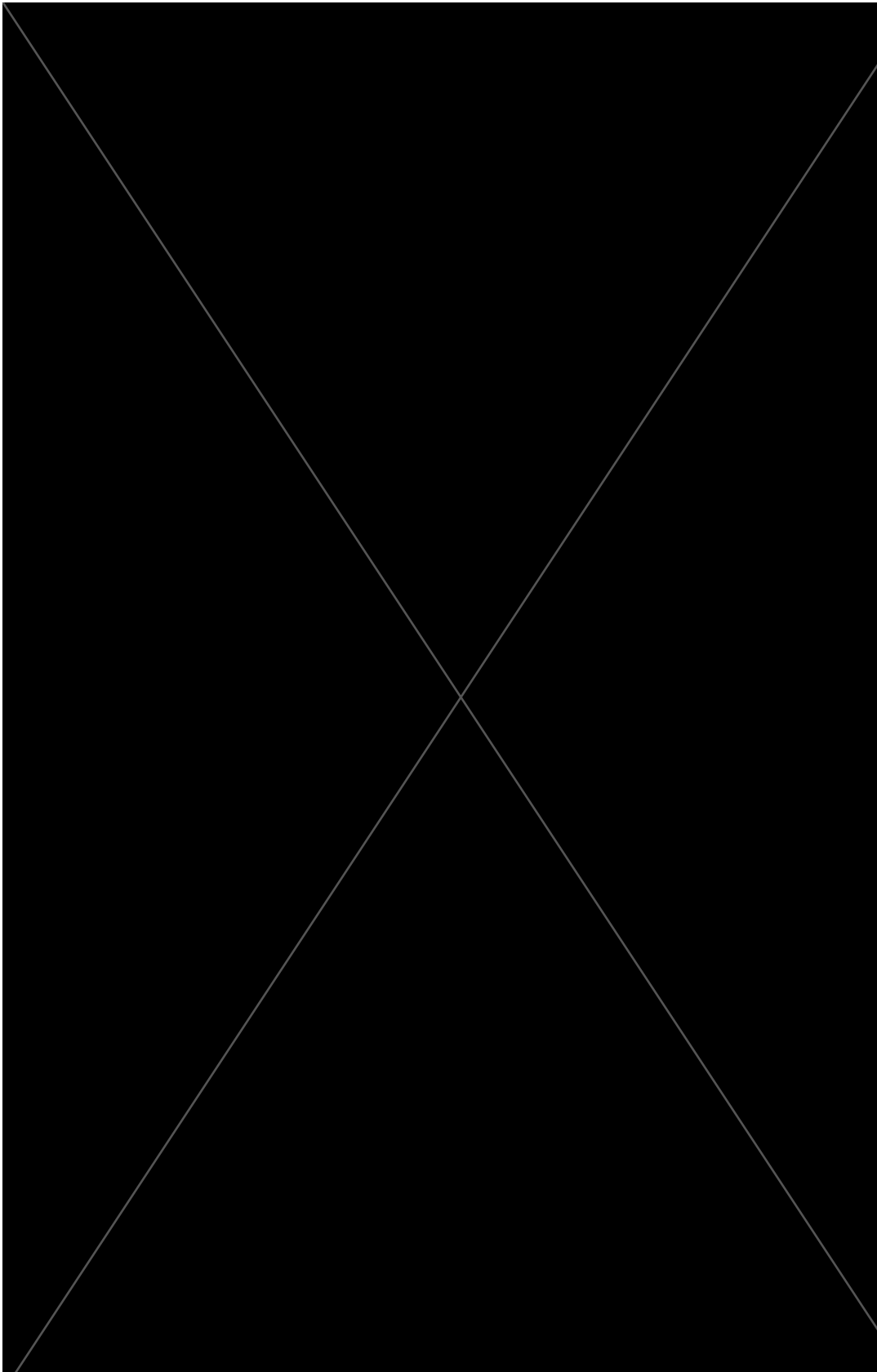


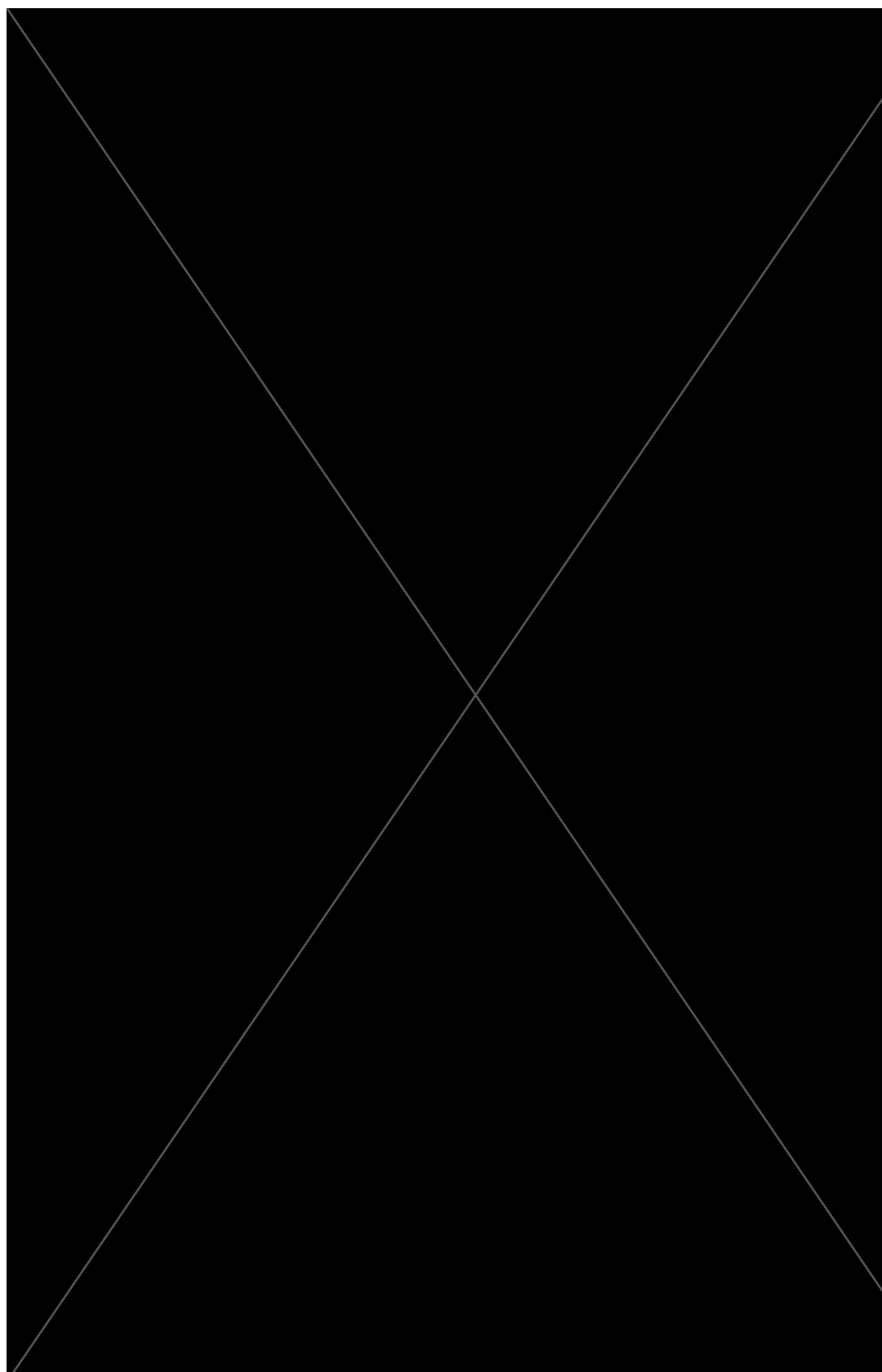


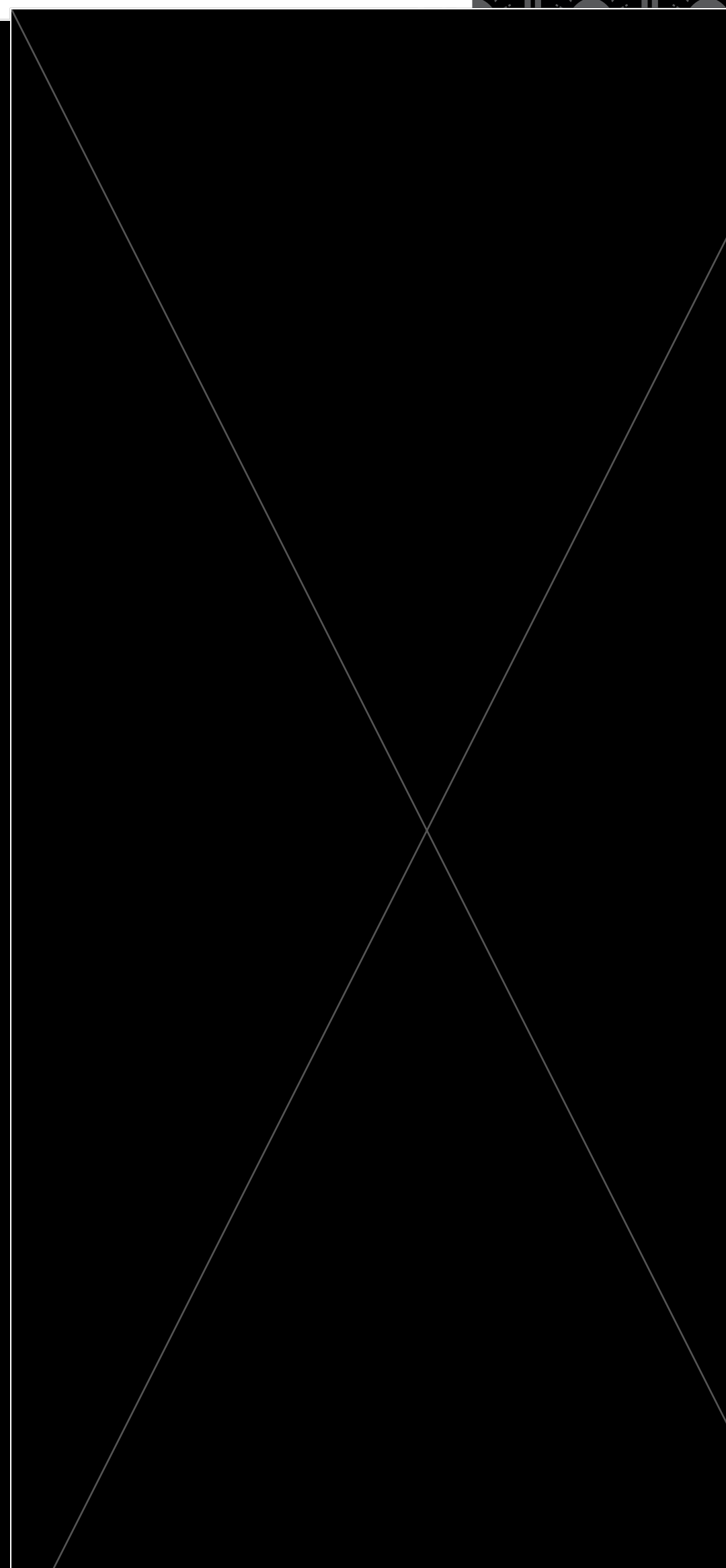


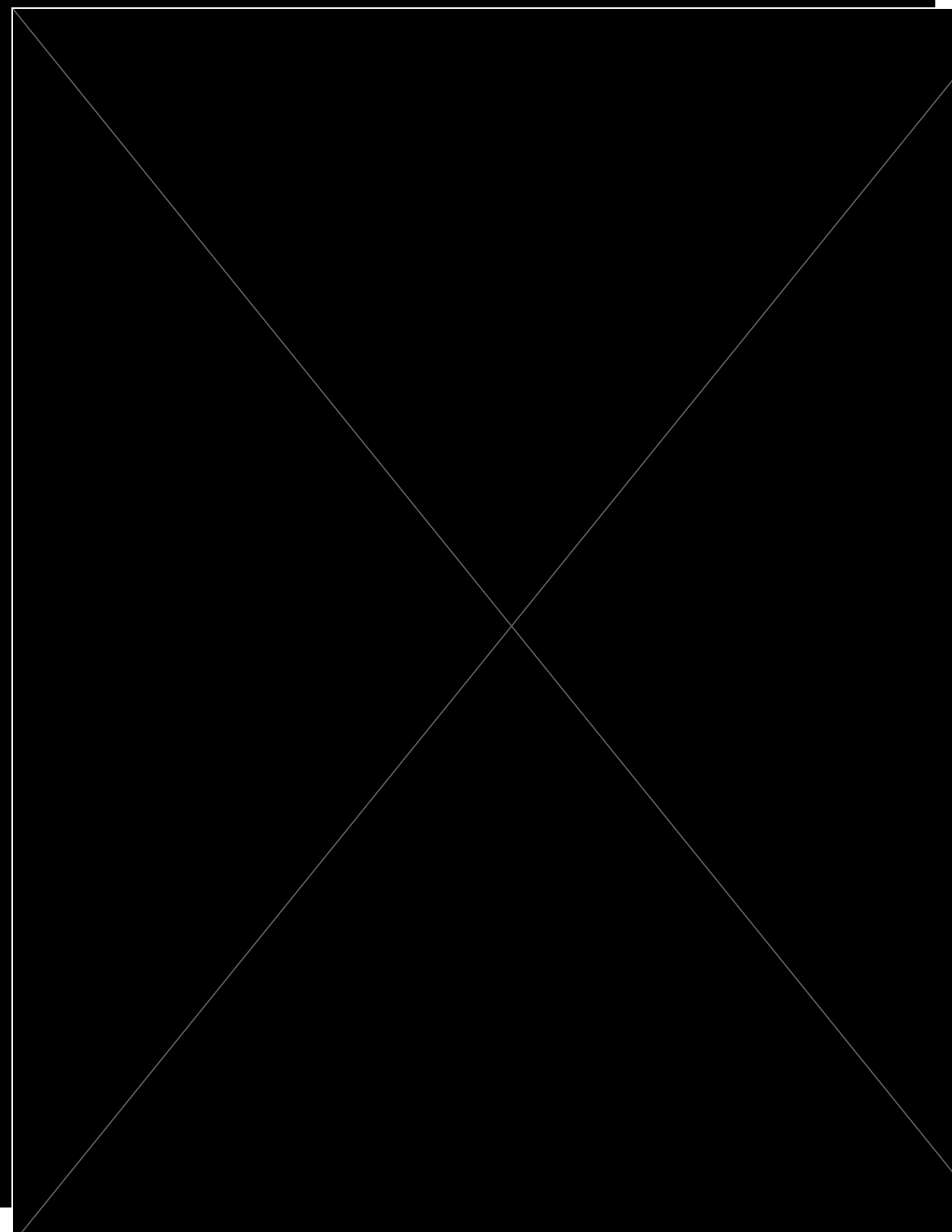


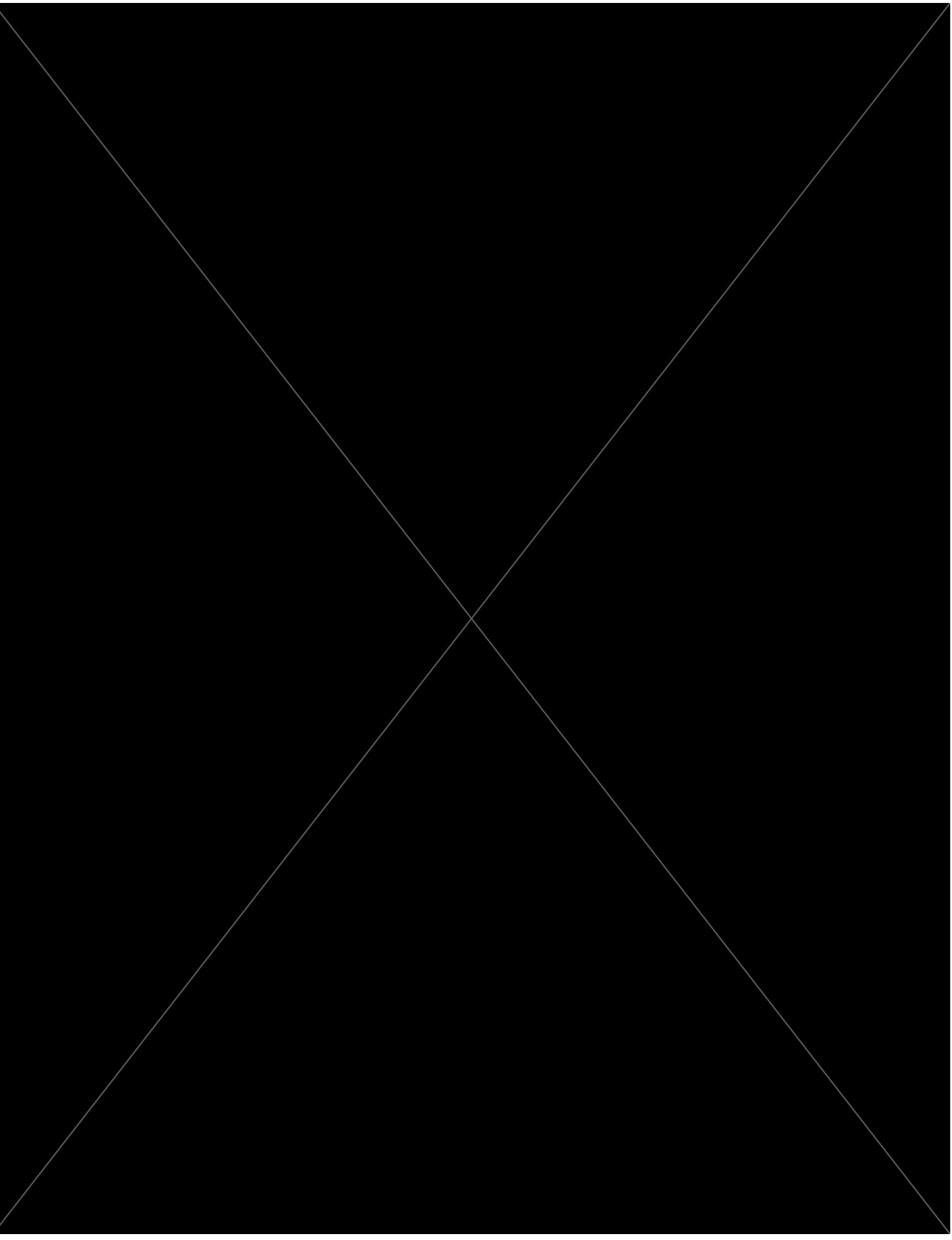


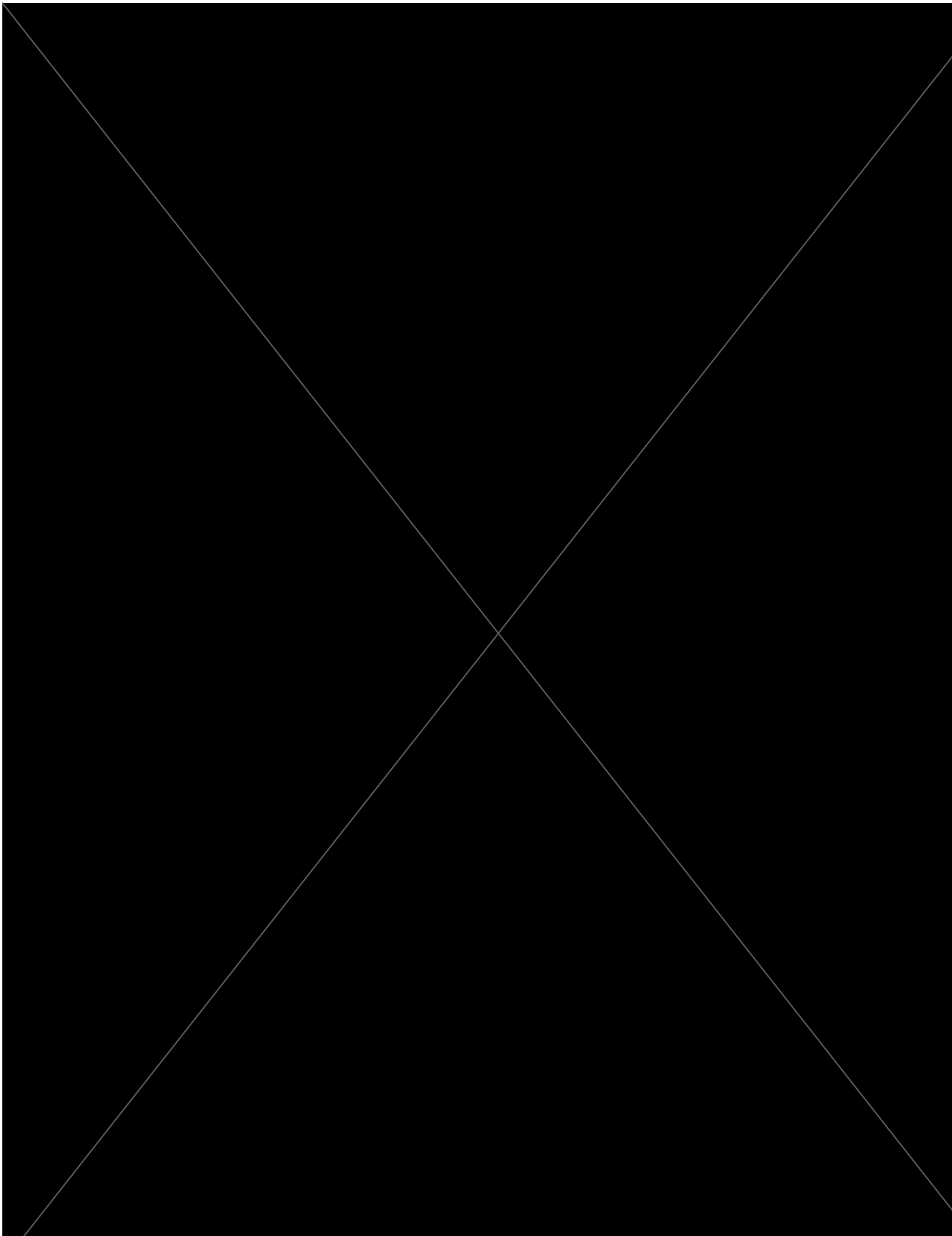


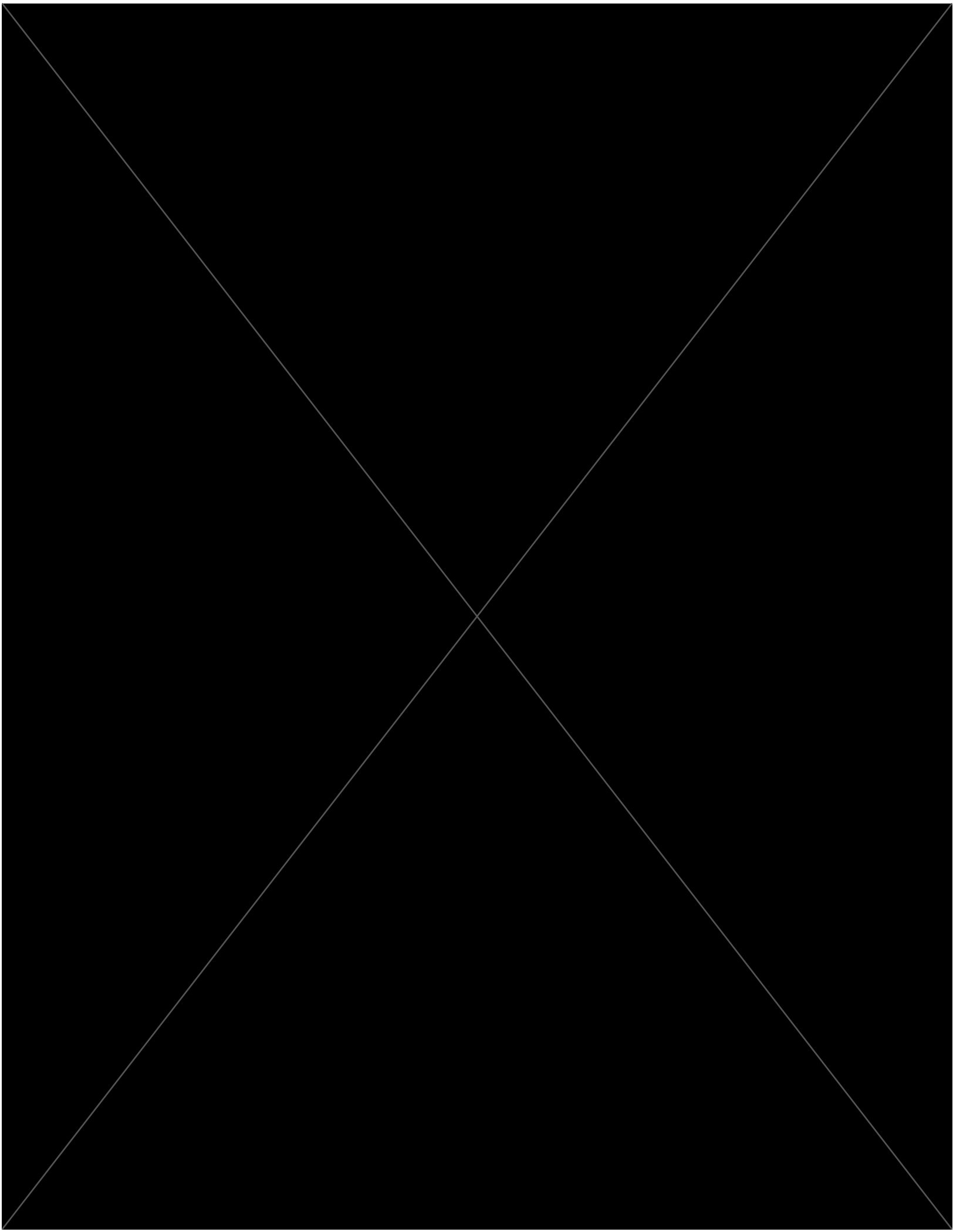


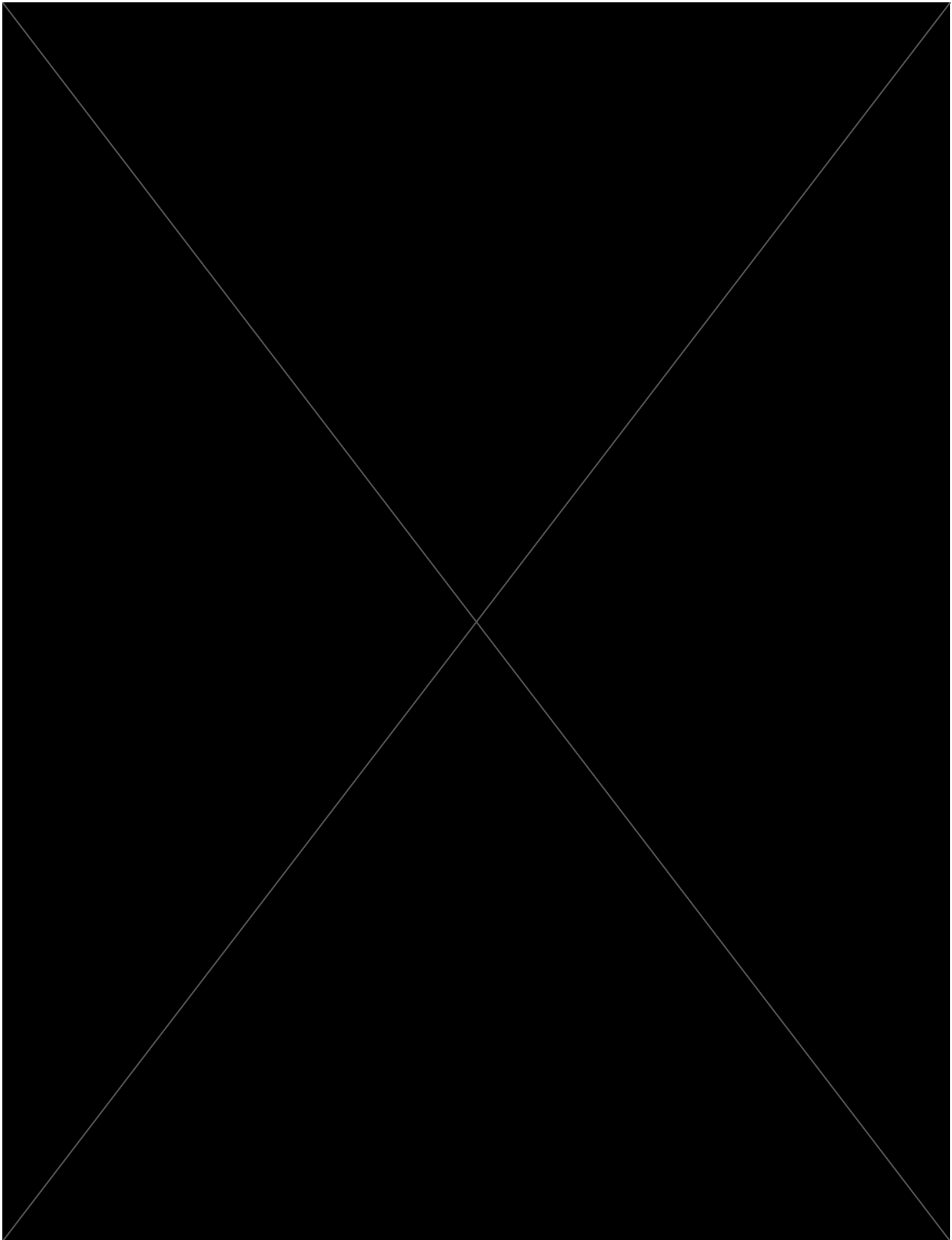


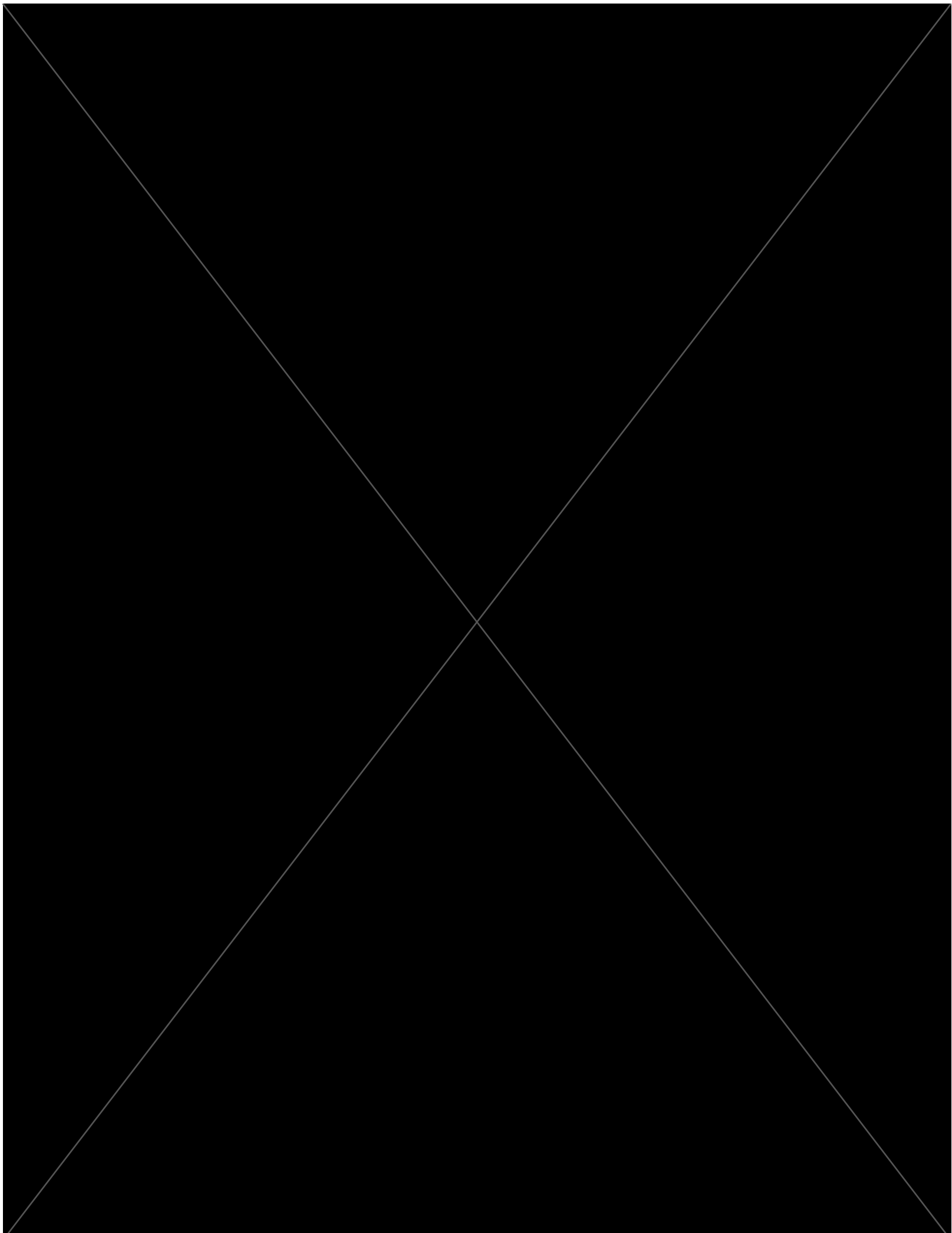


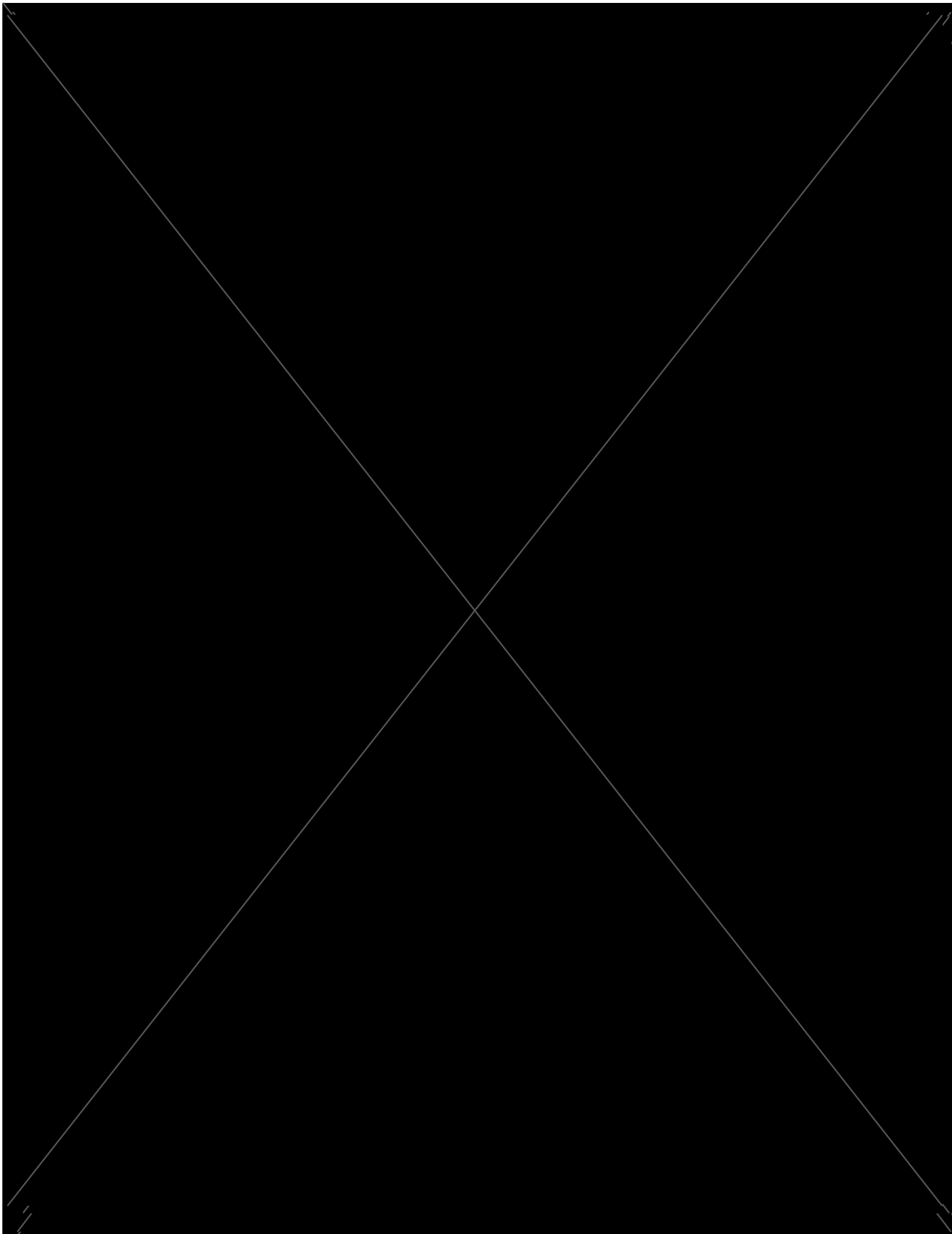


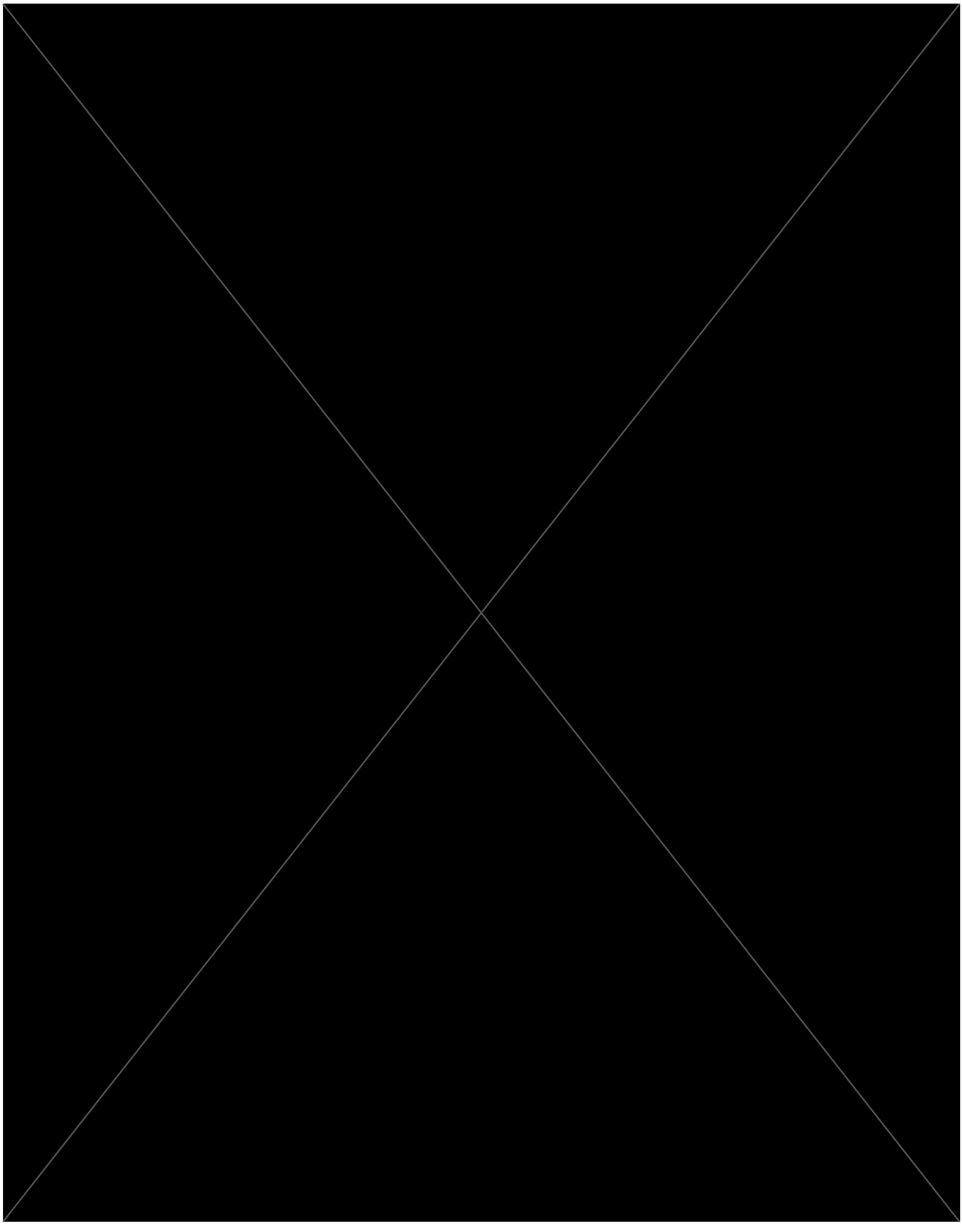












GRAMA Claim of Business Confidentiality

Pursuant to Utah Code Section 63G-2-305(1) and (2), and in accordance with Section 63G-2-309, _The Forest Murray__ (company name) asserts a claim of business confidentiality to protect the following information submitted as part of a Request for Proposals.

- [x] non-public financial statements
- [x] specific employee name and contact information
- [x] specific customer information, client lists, or subscription lists
- [ ] other (specify):

This claim is asserted because this information requires protection as it includes:

[x] trade secrets as defined in Utah Code Section 13-24-2 ("Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, or process, that: (a) derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and (b) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.)

[ ] commercial information or non-individual financial information obtained from a person if: (a) disclosure of the information could reasonably be expected to result in unfair competitive injury to the person submitting the information or would impair the ability of the governmental entity to obtain necessary information in the future; [and] (b) the person submitting the information has a greater interest in prohibiting access than the public in obtaining access.

Following is a concise statement of reasons supporting the claim of business confidentiality:

The Forest Murray has a number of proprietary processes that are employed to produce high quality medical cannabis for Utah Patients. These processes create increase economic value to the company and should be kept confidential.

Signed: _____

On behalf of (company): The Forest Murray

Date: 04/10/26

Utah Department of Agriculture and Food

4315 S 2700 W
Taylorsville,
UT 84129

cannabis@utah.gov
801-982-2375

Medical Cannabis Pharmacy Operating Plan Coversheet

In accordance with 26B-4-2, 4-41a and R66 a licensed Utah medical cannabis pharmacy must have an operating plan that describes how the pharmacy will comply with all applicable operating standards, statutes and administrative rules. **This document is not intended to be a full comprehensive list of all operating standards, statutes and administrative rules; it displays the minimum operating requirements for a facility.** Medical cannabis facilities must be familiar with and comply with all operating standards, statutes and administrative rules. Statues and administrative rules change frequently, verify you are using the most up to date form.

"Medical cannabis pharmacy" means a person that: acquires or intends to acquire medical cannabis from a cannabis processing facility or another medical cannabis pharmacy or a medical cannabis device; or possesses medical cannabis or a medical cannabis device; and sells or intends to sell medical cannabis or a medical cannabis device to a medical cannabis cardholder.

"Home delivery medical cannabis pharmacy" means a medical cannabis pharmacy that the department authorizes, as part of the pharmacy's license, to deliver medical cannabis shipments to a delivery address to fulfill electronic orders.

Application type

☑ Renewal ☐ Updated Submission/Change

Acknowledgements

The applicant understands that as an applicant and potential licensee you are REQUIRED to know the current statutory law, administrative rules and Departmental policies and comply in full? ☑ Yes ☐ No

The applicant understands that a license is not transferrable or assignable. ☑ Yes ☐ No

Medical Cannabis Pharmacy Operating Checklist

Please attach operating plan and page specification for required sections in a single PDF. All PDF uploads must be numbered sequentially to match the page numbers cited in this coversheet.

Business Documents & Information	Page(s) #
Business Name & DBA.	5-12
Physical Address & Mailing Address.	13
Business contact information (phone & e-mail).	13
Primary contact(s) for facility and information (position, phone, e-mail).	13-14
Active business license from city.	14-15
Proof of Performance bond/liquid cash account.	16-17
Land use permit, proximity waiver or other supporting documents for the business location.	18-19
A description of any investigation or adverse action taken by any licensing jurisdiction, government agency, law enforcement agency, or court in any state for any violation or detrimental conduct in relation to any of the applicant's cannabis-related operations or businesses. **If there is none for this business, please put N/A for the page number.**	20-22
Organization Information	**Page(s) #**

The name and address of an individual who: (A) for a publicly traded company, has a financial or voting interest of 10% or greater in the proposed medical cannabis pharmacy; (B) for a privately held company, a financial or voting interest in the proposed medical cannabis pharmacy; or (C) has the power to direct or cause the management or control of a proposed medical cannabis pharmacy;	23
A description of the credentials and experience of: each officer, director, or owner of the proposed medical cannabis pharmacy; and any highly skilled or experienced prospective employee.	23-25
Advertising standards (signage, website, etc.) and description of how business will comply with requirements.	25-26
Educational events & handout material.	26
Targeted marketing practice and description of how buiness with comply with requirements.	27
Services offered by Pharmacy & cooresponding SOPs. (in store, walk up, drive thru, express pick up, delivery).	27-35
Records that will be stored by the Pharmacy and plan to maintain for at least 5 years.	36
Training standards for staff and responsibilities/duties that will be performed based on position type.	36-49
Prodecure to ensure staff displays identification badge issued by the Department when on the facility premesis or while engaged in the transport of cannabis.	50
Describe how the Pharmacy will maintain a list of active employees that have an Agent card and how they will provide that list to the Department upon request.	50
Building & Security	**Page(s) #**
Business operating hours and hours open to public.	51
Description of the physical characteristics of the proposed facility, including a floor plan that shows access areas, room descriptions, and an architectural elevation.	51-55
Detail the video surveillance system and coverage.	56
Detailed security plan.	56
Procedure to prevent medical cannabis from being consumed at pharmacy.	56-57
Visitor policy and procedure.	57
Procedure to report actual or suspected criminal activity.	57
Inventory & Sales	**Page(s) #**
Transportation Procedure (between pharmacies, recalls/disposition back to processor, etc.).	57
Detail how the facility will handle: recalls, returns (pateint & processor/cultivation), waste, destruction and disposal.	58
Procedure to ensure correct labeling on produict received by the Pharmacy, displayed in online store (if applicable), and being dispensed to a pateint.	59
Detail storage protocols for all product.	60-64
Description of the inventory control system and the interaction with the State electronic verification system.	65
Detail inventory control procedures and procedure to mainatin accurate inventory and reporting of any discrepencies.	65-73
Procedure to keep sales within the state or RMP dosage limit, standards for partial filling.	74-77
Procedure to prohibit sale of expired, misbranded, adulterated, opened product.	78-82
Plan to meet requirements related to the patient information insert. What options are planned to be provided for the patients?	83-86
Procedure to verify pateint ID and active medical cannabis card. List procedure for all pick up types available at Pharmacy (in store, pick up, drive through, delivery).	87-90

Procedure to protect confidential cardholder data from the EVS and ensure only authorized individuals have access.	91
Home Delivery (If Applicable)	**Page(s) #**
If the Medical Cannabis Pharmacy is categorized as Home Delivery, please complete this section. If the Pharmacy utilizes a courier service, move on to "Delivery Procedures" section and note "N/A" on coversheet. If Pharmacy does not participate in home delivery to patients in any capacity, disregard both sections and note "N/A"	n/a
Description of vehicles used and how security and storage procedures will be maintained during transport and at facility.	n/a
Only deliver during 6am-10pm.	n/a
Procedure to ensure medical cannabis is not left unattended in vehicle for more than one hour.	n/a
Procedure to ensure the transport medical cannabis in a fully enclosed box, container, or cage, that is secured inside a delivery vehicle, and is held at an appropriate storage temperature throughout the delivery process to maintain the integrity of the product.	n/a
Procedure to provide the department with information regarding any vehicle used for the delivery service, including the vehicle's make, model, color, vehicle identification number, and license plate number.	n/a
Security plan that is specific for delivery that includes: a communication plan for couriers and dispatch/security team while enroute and clear procedures for handling of theft, security breaches or accidents.	n/a
Procedure to ensure that no person other than a pharmacy agent or courier agent is in a delivery vehicle during delivery or during the time medical cannabis is in the vehicle.	n/a
Delivery Procedures	**Page(s) #**
Procedure to ensure courier agent wears identification that clearly identifies them to a card holder.	n/a
Procedure for creating/mainiting manifest and ensuring no products are transported that do not appear on the manifest.	n/a
Procedure for missing items/loss of product.	n/a
Record keeping in ICS that ensures accountability for all products.	n/a
Detail the system used to provide real time tracking.	n/a
Policies for verifying the identity and validity of the individual receiving the medical cannabis to ensure the product is delivered to the correct medical cannabis cardholder or caregiver facility employee.	n/a
Procedure to notify the home delivery medical cannabis pharmacy's supervising PMP within 24 hours of when the medical cannabis pharmacy agent first became aware of the missing product.	n/a
Procedure to notify local law enforcement and the Department on any missing product.	n/a
Procedure to log any missing products into the inventory control system.	n/a
Procedure to return any undelivered product to the pharmacy.	n/a
Procedure to ensure changes are not made to orders.	n/a
Procedure to ensure cannabis is not consumed during delivery.	n/a
Procedure to verify payment has been made upon delivery.	n/a
Procedure to provide PMP contact info and hours of availability.	n/a
Change Requests (Renewal Only)	**Page(s) #**
Attach all approved change requets from past year of license.	92

Certification and Acknowledgements

Applicant understands the requirements for licensure are based on current statute and rule and are subject to change. Applicant agrees as a condition of licensing that he has read and will abide by the provisions of Utah Code 4-41a and all rules promulgated thereunder and all directives of the Utah Department of Agriculture and Food. The applicant also understands that failure to adhere to or maintain the qualifications of their license, may result in suspension or revocation of the license and/or forfeiture of the performance bond or any other remedies allowed by law.

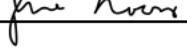
Applicant agrees to immediately notify the department of any change in ownership or financial interest of the facility; the facility's name, change in location, remodeling, expansion, reduction or physical, non-cosmetic alteration of the facility, change in written operating procedures, or change in any information submitted in this application.

The undersigned acknowledges that representatives of the Utah Department of Agriculture and Food may inspect the records and facility of a cannabis production establishment at any time during business hours to determine and ensure the cannabis production establishment is in compliance with the law. Failure to provide the department or the department's authorized agents immediate access to records and facilities during business hours in accordance with this section may result in a civil monetary penalty; license or registration suspension or revocation; or an immediate cessation of operations under a cease and desist order issued by the department.

Applicant acknowledges and understands that cultivating, possessing, using, distributing and/or selling marijuana is prohibited by federal law, notwithstanding Utah law or any authorizations in the Agent or this Registration to the contrary. Nothing in this application is intended to provide any guidance or assistance in violating or complying with existing federal laws regulating marijuana cultivation, distribution, or use. Similarly, compliance with state law or the terms of this registration, or possession of the registration card does not confer immunity from enforcement of federal law or federal enforcement practices. Further, nothing in this application or the registration card shall be construed as advice with regard to compliance with applicable federal, state, or local tax laws or any regulatory consequences of engaging in any business in this industry.

The undersigned acknowledges that they have read and understand the statements herein and the execution thereof is done voluntarily and by the authorization of the applicant entity.

The undersigned hereby makes application to the Utah Department of Agriculture and Food and certifies that the information contained herein and attached here is true and correct.

Name:	Jane Norris	
Signature:		**Date:** 4-8-26
For UDAF Office Use Only		
Date Received:	Date Approved:	
Compliance Officer:		

The Forest Murray

Section 1(a) Business Name & DBA

[redacted]

Section 1(b) Physical Address & Mailing Address.

[redacted]

Section 1(c) Business contact information (phone & e-mail)

[redacted]

Section 1(d) Primary contact(s) for facility and information (position, phone, e-mail)

[redacted]



Section 1(e) Active business license from city.

Section 1(f) Proof of Performance bond/liquid cash account.

Section 1(g) Land use permit, proximity waiver or other supporting documents for the business location.

MURRAY CITY

BUILDING DEPARTMENT

Certificate of Occupancy

Certificate Number:	E24386	Issue Date:	07/01/2025

Location: 6041 S State St

Owner: The Forest
6041 S State St Murray, UT 84107

Description of Work: Internal Buildout for Medical Marijuana Dispensary. Business Name: Standard Wellness – DBA The Forest. The project entails the internal buildout of a commercial space to serve as a medical marijuana dispensary.

Comments/Restrictions:

Issued Under Building Code: 2021 IBC, 2021 IMC, 2021 IPC, 2020 NEC

Type of Use/Occupancy Group: N/A

Construction Type: N/A

Occupant Load: N/A

Automatic Sprinklers Installed: No

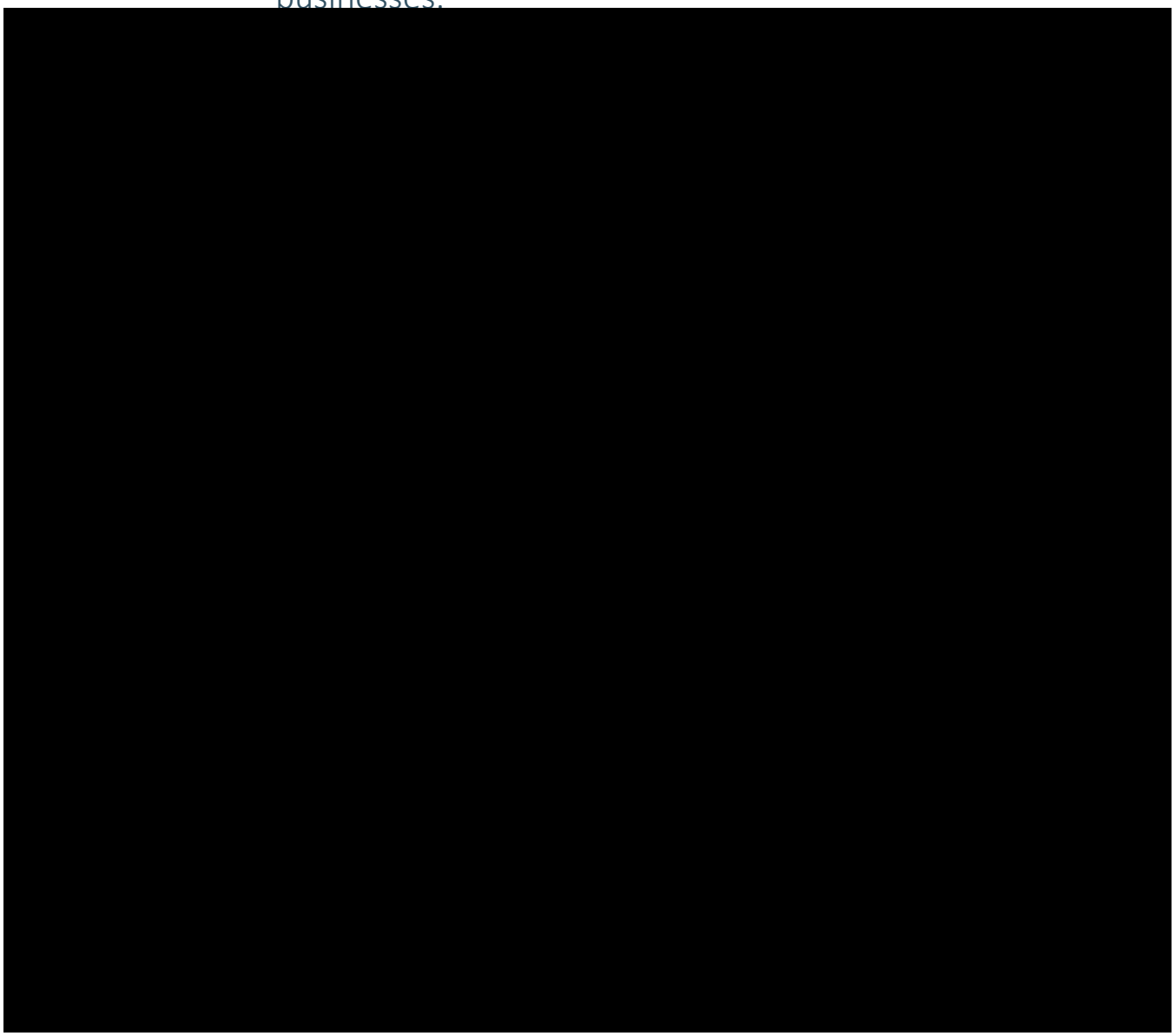
Sprinklers Required: No

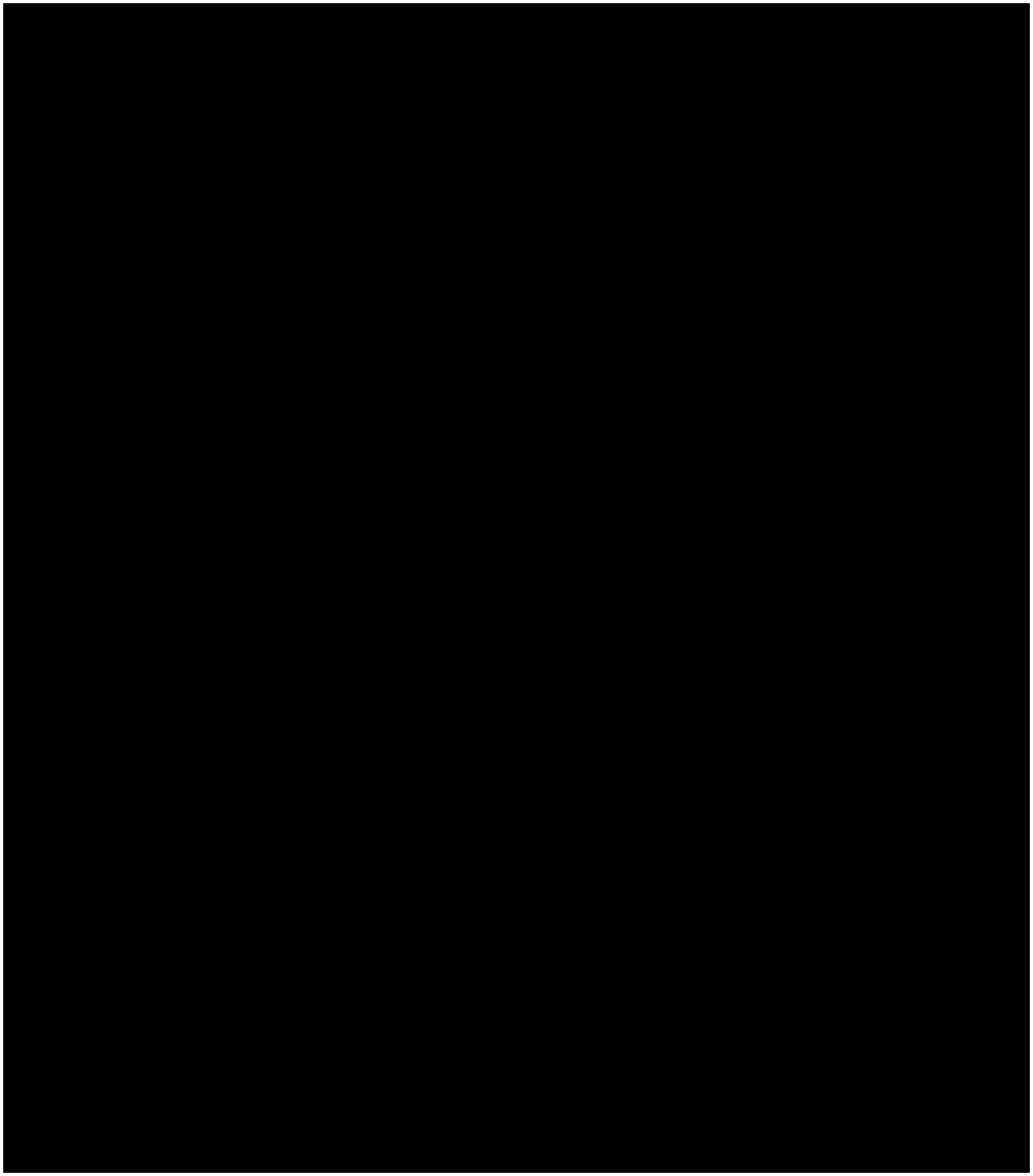
Faultline Services

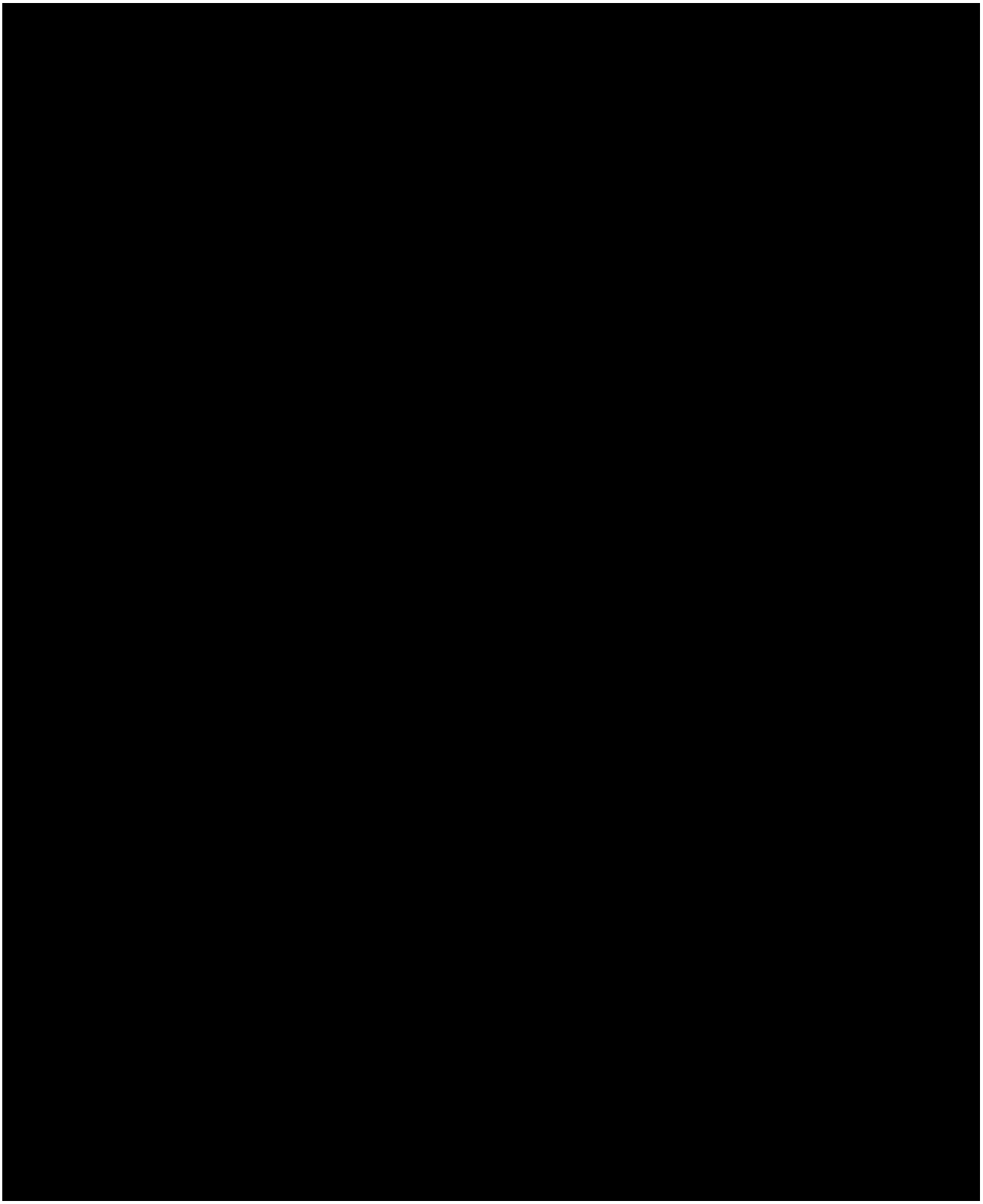
CONTRACTOR

SIGNATURE - BUILDING OFFICIAL

Section 1(h) A description of any investigation or adverse action taken by any licensing jurisdiction, government agency, law enforcement agency, or court in any state for any violation or detrimental conduct in relation to any of the applicant's cannabis-related operations or businesses.







Section 2(a) The name and address of an individual who: (A) for a publicly traded company, has a financial or voting interest of 10% or greater in the proposed medical cannabis pharmacy; (B) for a privately held company, a financial or voting interest in the proposed medical cannabis pharmacy; or (C) has the power to direct or cause the management or control of a proposed medical cannabis pharmacy.

[redacted]

Section 2(b) A description of the credentials and experience of: each officer, director, or owner of the proposed medical cannabis pharmacy; and any highly skilled or experienced prospective employee.

[redacted]

[redacted]

[redacted]

[redacted]

Section 2(c) Advertising standards (signage, website, etc.) and description of how business will comply with requirements.

[redacted]

[redacted]



Section 2(d) Educational events & handout material.

[redacted]

Section 2(e) Targeted marketing practice and description of how business will comply with requirements.

[redacted]

Section 2(f) Services offered by Pharmacy & corresponding SOPs. (in store, walk up, drive thru, express pick up, delivery).

[redacted]

Section 2(g) Records that will be stored by the Pharmacy

[redacted]

Section 2(h) Training standards for staff and responsibilities/duties that will be performed based on position type.

[redacted]

Section 2(i) Procedure to ensure staff displays identification badge issued by the Department when on the facility premesis or while engaged in the transport of cannabis.

[redacted]

Section 2(j) Describe how the Pharmacy will maintain a list of active employees that have an Agent card and how they will provide that list to the Department upon request.

[redacted]

Section 3(a) Business operating hours and hours open to public.

[redacted]

Section 3(b) Description of the physical characteristics of the proposed facility, including a floor plan that shows access areas, room descriptions, and an architectural elevation.

[redacted]

Section 3(c) Detail the video surveillance system and coverage.

[redacted]

Section 3(d) Detailed security plan.

[redacted]

Section 3(e) Procedure to prevent medical cannabis from being consumed at pharmacy.

[redacted]

[redacted]

Section 3(f) Visitor policy and procedure.

[redacted]

Section 3(g) Procedure to report actual or suspected criminal activity.

[redacted]

[redacted]

Section 4(a) Transportation Procedure (between pharmacies, recalls/disposition back to processor, etc.).

[redacted]

Section 4(b) Detail how the facility will handle: recalls, returns (patient & processor/cultivation), waste, destruction and disposal.

[redacted]

Section 4(c) Procedure to ensure correct labeling on produict received by the Pharmacy, displayed in online store (if applicable), and being dispensed to a patient.

[redacted]

Section 4(d) Detail storage protocols for all product.

[redacted]

Section 4(e) Description of the inventory control system and the interaction with the State electronic verification system.

[redacted]

Section 4(f) Detail inventory control procedures and procedure to maintain accurate inventory and reporting of any discrepencies.

[redacted]

Section 4(g) Procedure to keep sales within the state or RMP dosage limit, standards for partial filling.

[redacted]

Section 4(h) Procedure to prohibit sale of expired, misbranded, adulterated, opened product.



Section 4(i) Plan to meet requirements related to the patient information insert.

[redacted]

Section 4(j) Procedure to verify patient ID and active medical cannabis card. List procedure for all pick up types available at Pharmacy (in store, pick up, drive through, delivery).

[redacted]

Section 4(k) Procedure to protect confidential cardholder data from the EVS and ensure only authorized individuals have access.

[redacted]

Exhibit (A) Change Requests

Exhibit (B) Complete Collection of SOPs

GRAMA Claim of Business Confidentiality

Pursuant to Utah Code Section 63G-2-305(1) and (2), and in accordance with Section 63G-2-309,
Pure UT, LLC (company name) asserts a claim of business confidentiality to protect the following information submitted as part of a Request for Proposals.

- ☐ non-public financial statements
- ☒ specific employee name and contact information
- ☐ specific customer information, client lists, or subscription lists
- ☒ other (specify):

Trade secrets
Commercial Information

This claim is asserted because this information requires protection as it includes:

☒ trade secrets as defined in Utah Code Section 13-24-2 ("Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, or process, that: (a) derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and (b) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.)

☒ commercial information or non-individual financial information obtained from a person if: (a) disclosure of the information could reasonably be expected to result in unfair competitive injury to the person submitting the information or would impair the ability of the governmental entity to obtain necessary information in the future; [and] (b) the person submitting the information has a greater interest in prohibiting access than the public in obtaining access.

Following is a concise statement of reasons supporting the claim of business confidentiality:

Please see the attached GRAMA Claim of Business Confidentiality statement

Signed: _____

On behalf of (company): Pure UT, LLC

Date: 03/30/2026

GRAMA Claim of Business Confidentiality

The following is a concise statement supporting the claim of business confidentiality related to Pure UT, LLC's ("Applicant") submission for the Payson Medical Cannabis Pharmacy establishment application:

The information contained on Checklist p. 1-10 & 11-44 contain non-public individual and business information that is protected as trade secret and contains specific employee name and contact information. Applicant derives independent economic value from its business location, ownership structure, expected opening date, and operational hours to the extent that information is not readily ascertainable. Our competitors can derive economic value from its disclosure. Applicant has taken reasonably efforts to maintain the secrecy of such information.

Processing Establishment Property Information

The information contained on Response p.5, 11-44 contain non-public property and facility information that is protected as trade secret. Applicant derives independent economic value from its facility layout, blueprint descriptions, and description summaries for highly competitive application submissions. It has hired experts and expended considerable resources to design a state-of-the-art facility. Our competitors can derive economic value from its disclosure and competitive advantages from the disclosure of such information that is not publicly available. Applicant has taken reasonably efforts to maintain the secrecy of such information. In addition, keeping Applicant's facility diagrams confidential is vital for ensuring a secure facility. Disclosure could compromise the safety of the facility, its contents, and the employees working within the facility.

Operating Plan

The information contained on Response pages 11-44 strike at the heart of trade secret information and describe our facility's operating plan. Applicant derives independent economic value from its product types, product type descriptions, extraction methods and processes, equipment used, applicable security procedures and protocols, storage plans, recall practices, destruction methods, transportation strategies, and the formulas patterns, compilations, programs, devices, methods, techniques, and processes associated with the operating plan. Its description and summaries are kept confidential and are only available to internal personnel that need to know the information. Any such disclosure may be used in a highly competitive application submissions by competitors not only in Utah but other jurisdictions as well. Applicant has hired experts and expended considerable resources to develop its operating plan. Applicant has taken reasonably efforts to maintain the secrecy of such information. In addition, keeping Applicant's security information confidential is vital for ensuring a secure facility. Disclosure could compromise the safety of the facility, its contents, and the employees working within the facility.

Appendixes Empty

Applicant's Ownership structure, performance bond, manufactured food status, business license, and municipal permit constitute trade secret information. The descriptions constitute methods and

techniques related to the application procedures that our competitors could use upon disclosure to submit similarly situated applications without expending the time and resources necessary to create the same content. Applicant derives economic value from such documents and has taken reasonably necessary efforts to maintain its secrecy. Further, the ownership issue contains personal information not readily available to the public.

GRAMA Claim of Business Confidentiality

This concise statement constitutes a trade secret. As with other portions of the application descriptions, Applicant derives economic benefit from these statements. If disclosed, competitors could bypass the time and training expended and expertise necessary to detail trade secret and confidential information by copying such descriptions. Applicant has limited access to such descriptions and has not made them readily available to the public.

Utah Department of Agriculture and Food

4315 S 2700 W
Taylorsville,
UT 84129

cannabis@utah.gov
801-982-2375

Medical Cannabis Pharmacy Operating Plan Coversheet

In accordance with 26-61a-304 and R66 a licensed Utah medical cannabis pharmacy must have an operating plan that describes how the pharmacy will comply with all applicable operating standards, statutes and administrative rules. This document is not intended to be a full comprehensive list of all operating standards, statutes and administrative rules. Medical cannabis facilities must be familiar with and comply with all operating standards, statutes and administrative rules. Statues and administrative rules change frequently, verify you are using the most up to date form.

Application type

☐ New Application ☒ Renewal

Business Information

Submit a current local business license or permit from the city/municipality.

Business Entity type: _____ Individual _____ Coropration _____Partnership _X_ LLC

Business Name:	Pure UT, LLC	DBA:	
Physical Address:	484 S 1750 W Suite F Springville, UT 84663		

[redacted]

Name:				
Phone Number:			Name:	

GRAMA Claim of Business Confidentiality

Pursuant to Utah Code Section 63G-2-305(1) and (2), and in accordance with Section 63G-2-309, True North of Utah, LLC DBA The Flower Shop Ogden (company name) asserts a claim of business confidentiality to protect the following information submitted as part of a Request for Proposals.

- ☐ non-public financial statements
- ☒ specific employee name and contact information
- ☐ specific customer information, client lists, or subscription lists
- ☒ other (specify):

Trade secrets, confidential information and security protocols concerning True North's business including, without limitation, policies and procedures, cultivating methodology, compliance records, business plans, proprietary business information, personal information and business records.

This claim is asserted because this information requires protection as it includes:

☒ trade secrets as defined in Utah Code Section 13-24-2 ("Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, or process, that: (a) derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and (b) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.)

☒ commercial information or non-individual financial information obtained from a person if: (a) disclosure of the information could reasonably be expected to result in unfair competitive injury to the person submitting the information or would impair the ability of the governmental entity to obtain necessary information in the future; [and] (b) the person submitting the information has a greater interest in prohibiting access than the public in obtaining access.

Following is a concise statement of reasons supporting the claim of business confidentiality:

The information provided contains proprietary data, trade secrets, and/or sensitive business information. This includes operational processes and personal infromation.
Disclosure of this information to the public or it's competitors would result in substanital competitive harm, hinder operational efficiency, and negatively impact the organization. Therefore, this information is protected under applicable laws and regulations to safeguard business interests.

Signed: Alyssa Sofferin

On behalf of (company): True North of Utah, LLC DBA The Flower Shop Ogden

Date: 4/8/2026

GRAMA Claim of Business Confidentiality

Pursuant to Utah Code Section 63G-2-305(1) and (2), and in accordance with Section 63G-2-309, Bloc Pharmacy South Jordan (company name) asserts a claim of business confidentiality to protect the following information submitted as part of a Request for Proposals.

- ☑ non-public financial statements
- ☑ specific employee name and contact information
- ☑ specific customer information, client lists, or subscription lists
- ☑ other (specify):

Floor Plans

This claim is asserted because this information requires protection as it includes:

☑ trade secrets as defined in Utah Code Section 13-24-2 ("Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, or process, that: (a) derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and (b) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.)

☑ commercial information or non-individual financial information obtained from a person if: (a) disclosure of the information could reasonably be expected to result in unfair competitive injury to the person submitting the information or would impair the ability of the governmental entity to obtain necessary information in the future; [and] (b) the person submitting the information has a greater interest in prohibiting access than the public in obtaining access.

Following is a concise statement of reasons supporting the claim of business confidentiality:

To ensure the safety of the employees and the property of JG Utah LLC

Signed: Kristin Rigby

On behalf of (company): Bloc Pharmacy South Jordan

Date: March 18, 2026

Utah Department of Agriculture and Food

4315 S 2700 W
Taylorsville,
UT 84129

cannabis@utah.gov
801-982-2375

Medical Cannabis Pharmacy Operating Plan Coversheet

In accordance with 26B-4-2, 4-41a and R66 a licensed Utah medical cannabis pharmacy must have an operating plan that describes how the pharmacy will comply with all applicable operating standards, statutes and administrative rules. **This document is not intended to be a full comprehensive list of all operating standards, statutes and administrative rules; it displays the minimum operating requirements for a facility.** Medical cannabis facilities must be familiar with and comply with all operating standards, statutes and administrative rules. Statues and administrative rules change frequently, verify you are using the most up to date form.

"Medical cannabis pharmacy" means a person that: acquires or intends to acquire medical cannabis from a cannabis processing facility or another medical cannabis pharmacy or a medical cannabis device; or possesses medical cannabis or a medical cannabis device; and sells or intends to sell medical cannabis or a medical cannabis device to a medical cannabis cardholder.

"Home delivery medical cannabis pharmacy" means a medical cannabis pharmacy that the department authorizes, as part of the pharmacy's license, to deliver medical cannabis shipments to a delivery address to fulfill electronic orders.

Application type

☑ Renewal ☐ Updated Submission/Change

Acknowledgements

The applicant understands that as an applicant and potential licensee you are REQUIRED to know the current statutory law, administrative rules and Departmental policies and comply in full? ☑ Yes ☐ No

The applicant understands that a license is not transferrable or assignable. ☑ Yes ☐ No

Medical Cannabis Pharmacy Operating Checklist

Please attach operating plan and page specification for required sections in a single PDF. All PDF uploads must be numbered sequentially to match the page numbers cited in this coversheet.

Business Documents & Information	Page(s) #
Business Name & DBA.	5
Physical Address & Mailing Address.	5
Business contact information (phone & e-mail).	5
Primary contact(s) for facility and information (position, phone, e-mail).	5
Active business license from city.	6
Proof of Performance bond/liquid cash account.	7
Land use permit, proximity waiver or other supporting documents for the business location.	8
A description of any investigation or adverse action taken by any licensing jurisdiction, government agency, law enforcement agency, or court in any state for any violation or detrimental conduct in relation to any of the applicant's cannabis-related operations or businesses. **If there is none for this business, please put N/A for the page number.**	N/A
Organization Information	**Page(s) #**

The name and address of an individual who: (A) for a publicly traded company, has a financial or voting interest of 10% or greater in the proposed medical cannabis pharmacy; (B) for a privately held company, a financial or voting interest in the proposed medical cannabis pharmacy; or (C) has the power to direct or cause the management or control of a proposed medical cannabis pharmacy;	9-11
A description of the credentials and experience of: each officer, director, or owner of the proposed medical cannabis pharmacy; and any highly skilled or experienced prospective employee.	12-13
Advertising standards (signage, website, etc.) and description of how business will comply with requirements.	14-15
Educational events & handout material.	16-18
Targeted marketing practice and description of how buiness with comply with requirements.	14-15
Services offered by Pharmacy & cooresponding SOPs. (in store, walk up, drive thru, express pick up, delivery).	19-23
Records that will be stored by the Pharmacy and plan to maintain for at least 5 years.	24 (#10) , 50(note)
Training standards for staff and responsibilities/duties that will be performed based on position type.	25-36
Prodecure to ensure staff displays identification badge issued by the Department when on the facility premesis or while engaged in the transport of cannabis.	37 (#10-11)
Describe how the Pharmacy will maintain a list of active employees that have an Agent card and how they will provide that list to the Department upon request.	38 (d,e), 39-40
Building & Security	**Page(s) #**
Business operating hours and hours open to public.	8
Description of the physical characteristics of the proposed facility, including a floor plan that shows access areas, room descriptions, and an architectural elevation.	41-43
Detail the video surveillance system and coverage.	42-43
Detailed security plan.	44-47
Procedure to prevent medical cannabis from being consumed at pharmacy.	48-49
Visitor policy and procedure.	50-51
Procedure to report actual or suspected criminal activity.	53 (#5)
Inventory & Sales	**Page(s) #**
Transportation Procedure (between pharmacies, recalls/disposition back to processor, etc.).	53(#5), 55(#12),59(Outgoing)
Detail how the facility will handle: recalls, returns (pateint & processor/cultivation), waste, destruction and disposal.	53-58
Procedure to ensure correct labeling on produict received by the Pharmacy, displayed in online store (if applicable), and being dispensed to a pateint.	59 (#9),60-61
Detail storage protocols for all product.	62-63
Description of the inventory control system and the interaction with the State electronic verification system.	65(#24)66-67
Detail inventory control procedures and procedure to mainatin accurate inventory and reporting of any discrepencies.	68-69
Procedure to keep sales within the state or RMP dosage limit, standards for partial filling.	33-34,36
Procedure to prohibit sale of expired, misbranded, adulterated, opened product.	70
Plan to meet requirements related to the patient information insert. What options are planned to be provided for the patients?	60(e),61(i)
Procedure to verify pateint ID and active medical cannabis card. List procedure for all pick up types available at Pharmacy (in store, pick up, drive through, delivery).	19(6),20(7), 22(2)

Procedure to protect confidential cardholder data from the EVS and ensure only authorized individuals have access.	71(3)
Home Delivery (If Applicable)	**Page(s) #**
If the Medical Cannabis Pharmacy is categorized as Home Delivery, please complete this section. If the Pharmacy utilizes a courier service, move on to "Delivery Procedures" section and note "N/A" on coversheet. If Pharmacy does not participate in home delivery to patients in any capacity, disregard both sections and note "N/A"	N/A
Description of vehicles used and how security and storage procedures will be maintained during transport and at facility.	N/A
Only deliver during 6am-10pm.	N/A
Procedure to ensure medical cannabis is not left unattended in vehicle for more than one hour.	N/A
Procedure to ensure the transport medical cannabis in a fully enclosed box, container, or cage, that is secured inside a delivery vehicle, and is held at an appropriate storage temperature throughout the delivery process to maintain the integrity of the product.	N/A
Procedure to provide the department with information regarding any vehicle used for the delivery service, including the vehicle's make, model, color, vehicle identification number, and license plate number.	N/A
Security plan that is specific for delivery that includes: a communication plan for couriers and dispatch/security team while enroute and clear procedures for handling of theft, security breaches or accidents.	N/A
Procedure to ensure that no person other than a pharmacy agent or courier agent is in a delivery vehicle during delivery or during the time medical cannabis is in the vehicle.	N/A
Delivery Procedures	**Page(s) #**
Procedure to ensure courier agent wears identification that clearly identifies them to a card holder.	N/A
Procedure for creating/mainiting manifest and ensuring no products are transported that do not appear on the manifest.	N/A
Procedure for missing items/loss of product.	N/A
Record keeping in ICS that ensures accountability for all products.	N/A
Detail the system used to provide real time tracking.	N/A
Policies for verifying the identity and validity of the individual receiving the medical cannabis to ensure the product is delivered to the correct medical cannabis cardholder or caregiver facility employee.	N/A
Procedure to notify the home delivery medical cannabis pharmacy's supervising PMP within 24 hours of when the medical cannabis pharmacy agent first became aware of the missing product.	N/A
Procedure to notify local law enforcement and the Department on any missing product.	N/A
Procedure to log any missing products into the inventory control system.	N/A
Procedure to return any undelivered product to the pharmacy.	N/A
Procedure to ensure changes are not made to orders.	N/A
Procedure to ensure cannabis is not consumed during delivery.	N/A
Procedure to verify payment has been made upon delivery.	N/A
Procedure to provide PMP contact info and hours of availability.	N/A
Change Requests (Renewal Only)	**Page(s) #**
Attach all approved change requets from past year of license.	72-83

Certification and Acknowledgements

Applicant understands the requirements for licensure are based on current statute and rule and are subject to change. Applicant agrees as a condition of licensing that he has read and will abide by the provisions of Utah Code 4-41a and all rules promulgated thereunder and all directives of the Utah Department of Agriculture and Food. The applicant also understands that failure to adhere to or maintain the qualifications of their license, may result in suspension or revocation of the license and/or forfeiture of the performance bond or any other remedies allowed by law.

Applicant agrees to immediately notify the department of any change in ownership or financial interest of the facility; the facility's name, change in location, remodeling, expansion, reduction or physical, non-cosmetic alteration of the facility, change in written operating procedures, or change in any information submitted in this application.

The undersigned acknowledges that representatives of the Utah Department of Agriculture and Food may inspect the records and facility of a cannabis production establishment at any time during business hours to determine and ensure the cannabis production establishment is in compliance with the law. Failure to provide the department or the department's authorized agents immediate access to records and facilities during business hours in accordance with this section may result in a civil monetary penalty; license or registration suspension or revocation; or an immediate cessation of operations under a cease and desist order issued by the department.

Applicant acknowledges and understands that cultivating, possessing, using, distributing and/or selling marijuana is prohibited by federal law, notwithstanding Utah law or any authorizations in the Agent or this Registration to the contrary. Nothing in this application is intended to provide any guidance or assistance in violating or complying with existing federal laws regulating marijuana cultivation, distribution, or use. Similarly, compliance with state law or the terms of this registration, or possession of the registration card does not confer immunity from enforcement of federal law or federal enforcement practices. Further, nothing in this application or the registration card shall be construed as advice with regard to compliance with applicable federal, state, or local tax laws or any regulatory consequences of engaging in any business in this industry.

The undersigned acknowledges that they have read and understand the statements herein and the execution thereof is done voluntarily and by the authorization of the applicant entity.

The undersigned hereby makes application to the Utah Department of Agriculture and Food and certifies that the information contained herein and attached here is true and correct.

Name:	Kristin Rigby	
Signature:	Kristin Rigby	**Date:** 2.28.2026
	For UDAF Office Use Only	
Date Received:	Date Approved:	
Compliance Officer:		

JG Utah LLC DBA Bloc Pharmacy
Physical address & Mailing address:
10392 S Jordan Gateway
South Jordan, UT 84095
385-249-9400
[redacted]
Kristin [redacted]: Pharmacist in Charge (phone and email listed above)
Maggie [redacted]: General Manager (phone and email listed above)

Bloc Pharmacy offers purchases by:
Walk-in
Curbside
Drive-through

LICENSE NO.
LCB202100355

POST THIS LICENSE IN A CONSPICUOUS PLACE

SOUTH JORDAN
UTAH

BUSINESS LICENSE

THIS LICENSE IS NOT TRANSFERABLE

KEEP FOR YOUR RECORDS
BUSINESS TAX RECEIPT

ACCT. NO. **LCB202100355**

DATE EXPIRES
06/30/2026

This company has complied with the provisions of the statutes of the State of Utah and the ordinances of South Jordan City governing this type of business and has paid the City Treasurer the required fees to operate such business for the period stated.

DATE ISSUED
06/20/2025

PAYMENT
97.33

BUSINESS TAX

NOTICE: To engage in the business for which this license is issued, you must comply with all South Jordan City health and safety codes, including those related to zoning, building, health, and fire safety. If now or in the future, you do not comply with these codes, this license does not authorize you to engage in business.

Balance 0.00

Business Address: 10392 S Jordan Gtwy South Jordan, UT 84095

JG Utah LLC

Bloc Pharmacy
93 Route 37
Edgewood, IL 62426

Dawn R Ramsey
Mayor

City of South Jordan CORPORATE Seal State of Utah

Anna Crookston
City Recorder

Taxes paid in accordance with City Business License Ordinance

City of
South Jordan

VERIFICATION CERTIFICATE FOR INDEFINITE TERM SURETY BOND

THIS IS TO CERTIFY that Bond No. 612206233 **issued by** United States Fire Insurance Company **dated this** 31st **day of** May, 2024, **in the amount of Dollars** ($100,000.00), **on behalf of** JG Utah, LLC 10392 S Jordan Gtwy South Jordan, UT 84095 **(as Principal), and in favor** State of Utah, Department of Agriculture and Food **(as Obligee), covers a term which began on the** 31st **day of** May, 2024, **and ends only with the cancellation of said bond or other legal termination thereof; and that the said bond remains in effect, subject to all its agreements, conditions and limitations.**

Signed, sealed and dated March 3, 2026

United States Fire Insurance Company

BY: J. P. Harney
John P. Harney, Attorney-in-Fact

Current Term of Bond: May 31, 2026 to May 31, 2027

POWER OF ATTORNEY
UNITED STATES FIRE INSURANCE COMPANY
PRINCIPAL OFFICE - MORRISTOWN, NEW JERSEY

KNOW ALL MEN BY THESE PRESENTS: That United States Fire Insurance Company, a corporation duly organized and existing under the laws of the state of Delaware, has made, constituted and appointed, and does hereby make, constitute and appoint: **John P. Harney**

each, its true and lawful Attorney(s)-In-Fact, with full power and authority hereby conferred in its name, place and stead, to execute, acknowledge and deliver: Any and all bonds and undertakings of surety and other documents that the ordinary course of surety business may require, and to bind United States Fire Insurance Company thereby as fully and to the same extent as if such bonds or undertakings had been duly executed and acknowledged by the regularly elected officers of United States Fire Insurance Company at its principal office, in amounts or penalties: **Unlimited**

This Power of Attorney limits the act of those named therein to the bonds and undertakings specifically named therein, and they have no authority to bind United States Fire Insurance Company except in the manner and to the extent therein stated.

Surety Bond No.: 612206233
Principal: JG Utah, LLC
Obligee: State of Utah, Department of Agriculture and Food

This Power of Attorney is granted pursuant to Article IV of the By-Laws of United States Fire Insurance Company as now in full force and effect, and consistent with Article III thereof, which Articles provide, in pertinent part:

Article IV, Execution of Instruments - Except as the Board of Directors may authorize by resolution, the Chairman of the Board, President, any Vice-President, any Assistant Vice President, the Secretary, or any Assistant Secretary shall have power on behalf of the Corporation:

(a) to execute, affix the corporate seal manually or by facsimile to, acknowledge, verify and deliver any contracts, obligations, instruments and documents whatsoever in connection with its business including, without limiting the foregoing, any bonds, guarantees, undertakings, recognizances, powers of attorney or revocations of any powers of attorney, stipulations, policies of insurance, deeds, leases, mortgages, releases, satisfactions and agency agreements;
(b) to appoint, in writing, one or more persons for any or all of the purposes mentioned in the preceding paragraph (a), including affixing the seal of the Corporation.

Article III, Officers, Section 3.11, Facsimile Signatures. The signature of any officer authorized by the Corporation to sign any bonds, guarantees, undertakings, recognizances, stipulations, powers of attorney or revocations of any powers of attorney and policies of insurance issued by the Corporation may be printed, facsimile, lithographed or otherwise produced. In addition, if and as authorized by the Board of Directors, dividend warrants or checks, or other numerous instruments similar to one another in form, may be signed by the facsimile signature or signatures, lithographed or otherwise produced, of such officer or officers of the Corporation as from time to time may be authorized to sign such instruments on behalf of the Corporation. The Corporation may continue to use for the purposes herein stated the facsimile signature of any person or persons who shall have been such officer or officers of the Corporation, notwithstanding the fact that he may have ceased to be such at the time when such instruments shall be issued.

IN WITNESS WHEREOF, United States Fire Insurance Company has caused these presents to be signed and attested by its appropriate officer and its corporate seal hereunto affixed this 18th day of November, 2024.

UNITED STATES FIRE INSURANCE COMPANY

Matthew E. Lubin, President

State of New Jersey }
County of Morris }

On this 18th day of November, 2024, before me, a Notary public of the State of New Jersey, came the above named officer of United States Fire Insurance Company, to me personally known to be the individual and officer described herein, and acknowledged that he executed the foregoing instrument and affixed the seal of United States Fire Insurance Company thereto by the authority of his office.

ETHAN SCHWARTZ
NOTARY PUBLIC
STATE OF NEW JERSEY
MY COMMISSION EXPIRES 6/25/2028
COMMISSION# 50122171

Ethan Schwartz (Notary Public)

I, the undersigned officer of United States Fire Insurance Company, a Delaware corporation, do hereby certify that the original Power of Attorney of which the foregoing is a full, true and correct copy is still in force and effect and has not been revoked.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the corporate seal of United States Fire Insurance Company on the 3rd day of March 2026

UNITED STATES FIRE INSURANCE COMPANY

Michael C. Fay, Senior Vice President

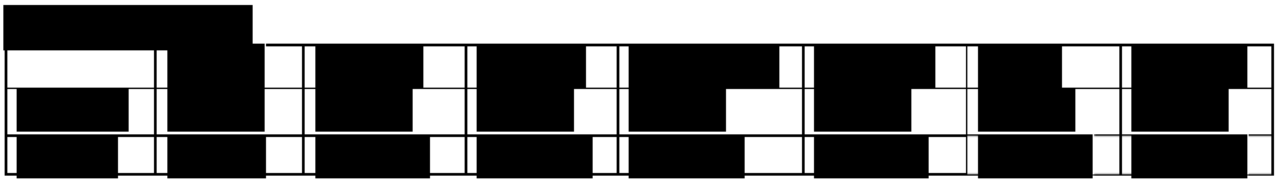
CONTACT INFORMATION: Bond Verifications: surety@cfins.com / Claims: SuretyClaimsSupport@cfins.com

City/State Requirements:

Hours of Operations: Open to the Public
State requires a weekly minimum of thirty-six open business hours. Bloc pharmacy will be open for business ninety-five hours each week.

Open to the Public

	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Opening	8:00AM	7:00AM	7:00AM	7:00AM	7:00AM	7:00AM	7:00AM
Closing	7:00PM	9:00PM	9:00PM	9:00PM	9:00PM	9:00PM	9:00PM



Special City Law Requirements:
The only extra requirement enforced by the City of South Jordan was the installation of two water fountains which has been completed.

State Location Requirements:
The pharmacy is not located within 200 feet of a community location or within 600 feet of a primarily residential district. The district is primarily a commercial zone. However, it is within 1.9 miles to 10 miles of numerous local communities/patients.

License may NOT be sold or transferred:
JG Utah LLC acknowledges that the medical cannabis pharmacy license is not transferrable or assignable.

1. medical cannabis pharmacy shall report in writing to the Department of Agriculture no later 10 business days before the date of any change of ownership of the medical cannabis pharmacy.
2. A Pharmacy Operation Change Request Form will be submitted to the Department of Agriculture to notify the department of any changes.

JG UTAH LLC – OWNERSHIP TABLE

Owner	Original Ownership Interest	Post-Sale Ownership Interest
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]

[redacted]



[redacted]

Biographies for Bloc Pharmacy – South Jordan

Alexandra [redacted], President

[redacted]

Maggie [redacted], General Manager

[redacted]

Brady [redacted], Inventory Manager

[redacted]

[redacted]

Advertising and Targeted Marketing

PURPOSE: To ensure JG Utah is abiding by all state rules and regulations regarding signage, website, targeted marketing and educational events and materials.

SCOPE: All JG Utah, LLC ("JG Utah") employees.

INSTRUCTIONS:

1. JG Utah will only use signage on the outside of the medical cannabis pharmacy that includes:
    - the medical cannabis pharmacy's name, logo, and hours of operation;
    - complies with local ordinances regulating signage
2. Except as provided in this section, JG Utah will not advertise in any medium regarding a medical cannabis pharmacy or the dispensing of medical cannabis within the state. JG Utah may:
    - advertise an employment opportunity at the medical cannabis pharmacy
3. JG Utah may advertise:
    - the pharmacy's name and logo
    - the location and hours of operation of the medical cannabis pharmacy
    - a service available at the medical cannabis pharmacy
    - personnel affiliated with the medical cannabis pharmacy
    - whether the medical cannabis pharmacy is licensed as a home delivery medical cannabis pharmacy
    - best practices that the medical cannabis pharmacy upholds
    - educational material related to the medical use of cannabis, as defined by the department
4. JG Utah may maintain on the medical cannabis pharmacy's website non-promotional information regarding the medical cannabis pharmacy's inventory.
5. JG Utah may engage in targeted marketing, as determined by the department, for advertising a particular medical cannabis product, medical cannabis device, or medical cannabis brand via email which is obtained when patient registers with the pharmacy and in store.
6. JG Utah may not provide any gift items or merchandise other than educational materials, as those terms are defined by the department.

- Educational materials may not include any marketing for a specific product from the medical cannabis pharmacy or any other statement, claim, or information that would violate the federal Food, Drug, and Cosmetic Act, 21 U.S.C. Sec. 301, et seq.

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.
- Upper management will maintain a checklist to ensure that each employee has completed the required trainings.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

Cannabis Consult Recommendation

"Start Low and Go Slow"

Gelatin Cube: _____ with food AM / Noon / PM

Increase dose by _____ cube until optimal effect is obtained.
Allow 2 hours for full effect & before increasing dose.
Effect lasts 6-8 hours.

Tincture: _____ Place _____ drops/ml under tongue. Hold for 30 seconds before swallowing. Use in the AM / PM / or every 2 to 4 hours.
Increase dose by _____ drops until optimal dose is obtained.
Allow 30 minutes for full effect & before increasing dose.
Effect lasts 6-8 hours.

Vape: FLOWER / CARTRIDGES _____

Inhale 1 to 3 puffs. Allow 30 minutes for full effect.
Dose every 1-4 hours as needed.
Effect lasts 1-4 hours.

Topical: _____

Apply to the affected area and massage into the area for a minimum of 2 minutes.
Reapply as needed. Length of effect varies.

Additional Comments:

_____
_____
_____
_____

BLOC
PHARMACY

Questions? Please call us at …….

Cannabis Accidental Ingestion & Toxicity Guide

1. Anyone who accidentally ingests cannabis—especially a **child**—can experience overdose effects such as intoxication, altered perception, anxiety, panic, paranoia, dizziness, weakness, slurred speech, poor coordination, apnea, and heart problems.
2. If there are marijuana products in your home, store them as you would medications. Make sure the products are in out-of-reach or locked locations, in child-resistant packaging or containers. Clearly label marijuana edibles, and store them in their original packaging.
3. If your child eats marijuana by accident, call the free poison control hotline at 1-800-222-1222 as soon as possible for fast help. If symptoms seem severe, call 911 or go to an emergency room right away.
4. The experience can be very unpleasant, but your health is not at risk.
5. Stay calm, find a quiet place, and take deep breaths. Stay in a comfortable and familiar environment.
6. Effects will wear of in minutes to hours depending on the product consumed and method of consumption.
7. May feel groggy and sweat excessively.
8. Try to sleep it off. If unable to sleep or "turn your brain off", fresh air and a walk can help. Never walk alone, and if feeling too dizzy or disoriented, a walk may not be an option.
9. Try taking CBD. It can counteract the effects of THC. Be careful the product does not contain any additional THC.
10. Try chewing on a few peppercorns. Black peppercorns actually help if you are having symptoms of anxiety and paranoia.
11. A warm or cool bath/shower helps some individuals.

BLOC

TOP TERPENES

TERPENES	EFFECTS	ALSO FOUND IN	MEDICAL BENEFITS
Terpinolene	Sedating	Nutmeg, apple, cumin, tea tree	Antioxidant, Sedative, Anti-fungal, Anti-bacterial
Linalool	Sedating, calming	Lavender, laurel, birch, rosewood	Insomnia, Stress, Depression, Anxiety, Pain, Convulsions
Limonene	Elevated mood, stress relief	Citrus rinds, juniper, peppermint	Anti-depression, Anti-Anxiety, Gastric reflux, Anti-fungal
Myrcene	Relaxing, enhancing THC's psychoactivity	Mango, thyme, citrus, lemongrass, bay leaf	Anti-septic, Anti-bacterial, Anti-fungal, Anti-inflammation
Pinene	Memory retention, alertness	Pine needles, conifer, sage	Anti-Inflammation, Asthma (Bronchodilator)
Caryophyllene	Sense of well-being	Pepper cloves, hops, basil, oregano	Anti-oxidant, Insomnia, Anti-Inflammation, Pain, Muscle Spasms, Reduce Anxiety
Humulene	Suppresses appetite	Hops, coriander	Anti-inflammation, Anti-bacterial, Pain relief

MOST COMMON CANNABINOIDS

What they are & how do they help?

THC	• Pain Reliever • Sedative • Anti-Anxiety • Anti-Seizure • Anti-Tumor • Anti-Nausea	• Reduces Muscle Spasms • Appetite Stimulant • Anti-Inflammatory • Neuroprotective
CBN	• Anti-Anxiety • Reduces Muscle Spasms • Anti-inflammatory • Neuroprotective	• Sedative • Pain Reliever • Appetite Stimulant
CBD	• Anti-Convulsant • Neuroprotective • Anti-Inflammatory • Relieves Psoriasis • Pain Reliever • Anti-Anxiety • Anti-Tumor	• Blood Sugar Control • Reduces Muscle Spasms • Immune System Support • Promotes Bone Growth
CBG	• Anti-Bacterial • Anti-Fungal • Blood Sugar Control • Anti-Tumor • Neuropathy	• Anti-Inflammatory • Reduces Muscle Spasms • Promotes Bone Growth • Blood Pressure Control
CBC	• Anti-Inflammatory • Anti-Tumor • Pain Reliever • Anti-Convulsant	• Sedative • Anti-Microbial • Promotes Bone Growth

Drive-Through Procedure

Instructions: Drive-through Purchase**:** Procedure for patients purchasing through the drive-through.

1. Patient makes online reservation. They must choose Pickup (Drive-thru). They must also choose a pickup time which are in 30 minute blocks starting at 7am and ending at 8:30pm on Monday through Saturday and 8:30am to 6:30pm on Sunday.
2. If the patient is new to Bloc Pharmacy, the agent will notify the pharmacist on duty.
    a. The pharmacist will check the patient's recommendation and complete the patients profile if the patient has already completed a pharmacy consult.
    b. If the patient is a first time cardholder requiring a pharmacy consult, the PMP on duty will call the patient and perform an over the phone consult or they will schedule a consult and cancel the order if it cannot be completed that day.
3. Staff receives online reservation and fills reservation as usual and product(s) placed in an opaque bag.
4. Once the order is fulfilled, it is stored behind the POS on the drive-thru order shelves.
5. Once the reservation/order is filled, patient/caregiver will receive a text message via Dutchie (online reservation platform).
6. At the scheduled time, the patient will pull through the drive-thru. The pharmacy agent will collect the patient's/caregiver's Utah Medical Marijuana card, state approved photo identification, and payment in full.
7. Patient may pay via Pay by Bank, debit card or a cash payment
8. Agent will verify the order with the patient then process the sale and print labels and receipts.
9. Receipt, any change due, MMJ card, state approved photo identification and products purchased contained in an opaque bag will be given to the patient.
10. Patients may pick up only the products ordered online. They may not add to the order. They may choose to not purchase product(s) in the order.
11. All online orders that are not picked up by the close of business are put back into inventory and stored in the vault.

MONITORING:

- Pharmacist-in-Charge (PIC), GM, AGM, and Supervisors will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

Curbside Delivery Procedure

Instructions: Curbside Purchase**:** If a patient requires drive up service, s/he can call in advance of purchase to arrange with Manager, Guard or Pharmacist.

1) Patient makes online reservation.
    a) Staff receives online reservation and fills reservation as usual, certification checked, and product placed in opaque bag.
    b) Once the order is fulfilled, it is stored behind the POS on the back counter. All online orders that are not picked up by the close of business are put back into inventory and stored in the vault.
    c) Once the reservation/order is filled, patient/caregiver to receive text message via Dutchie (online reservation platform).

2) If the patient is a first time cardholder requiring a pharmacy consult, the PMP on staff will perform an over the phone consult.

3) Staff receives online reservation and fills reservation as usual, certification checked, and product placed in opaque bag.

4) Once the order is fulfilled, it is stored behind the POS on the back counter. All online orders that are not picked up by the close of business are put back into inventory and stored in the vault.

5) Once the reservation/order is filled, patient/caregiver to receive text message via Dutchie (online reservation platform).

6) If the patient is a first time cardholder requiring a pharmacy consult, the PMP on staff will perform an over the phone consult.

7) At the agreed upon time, patient pulls up alongside the dispensary in a designated parking spot (designated spots are located directly in front of the pharmacy, closest to the entrance). At curbside, Bloc Pharmacy staff will collect the patient/caregiver's Utah Medical Marijuana card, driver's license, and payment in full.

8) The card and payment will be brought to the POS, card scanned to confirm validity first. Once confirmed, sale processed and receipts printed. Receipt, any change due and MMJ card placed into the bag with the product.

9) Bag delivered to the Patient/Caregiver curbside, with at least two agents at all times.

All monetary sales transactions and medication delivery to patients will be within the coverage of surveillance cameras*

Patient Check-in

Purpose: Procedure for al JG Utah Pharmacists (PMP's) and Pharmacy Agents to follow to abide by the laws governing cannabis sales in Utah.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") employees working in our medical cannabis pharmacy facility who will be completing sales and customer check-ins.

Instructions:

1. Patient will be greeted at the front desk check-in.
2. PCA will obtain the patient's driver's license, passport or state accepted form of identification and their Utah Medical Cannabis Patient Card.

State accepted forms of identification:

   a. any US driver's license or identification card
   b. valid federal-issued photo identification:
      i. US passport
      ii. US passport card
      iii. US military identification card
   c. tribal identification card
   d. valid international passport
   e. Military ID
      i. Uniformed Services Identification Card
      ii. Department of Defense Common Access Card
      iii. U.S. Coast Guard Merchant Mariner Card
      iv. Other Military IDs
   f. GET Mobile ID (digital ID approved by the state)
      i. Must be verified using the GET Mobile Verify app.
      ii. iPad will be kept at check-in that has the app downloaded onto it

3. PCA will check the patient into the queue.
4. If the patient is an existing Bloc pharmacy patient, the PCA will ask the patient if they have any questions for the PMP during this visit. The PCA will allow the patient entrance to the sales floor.
5. PCA will notify the PMP using Microsoft chat if the patient has questions.
6. PCA will alert the PMP if the patient has a red thumbs down photo icon. (see SOP for Pharmacist Transaction Verification)
7. PMP will use the Cannabis Consult Recommendation form to communicate dosing guidelines and limits per QMP.
8. If the patient is a first time customer, the PCA will alert the PMP via Microsoft Teams chat.
   a. PCA will ask the patient if they had had an initial pharmacy consult at another pharmacy or if they need to meet with the PMP at Bloc.
   b. PCA will create a patient profile adding the patient's phone number, email address gender and QMP.
   c. PMP will verify the patient's card, QMP, notes and recommendation in EVS.
   d. PMP will perform initial consult if needed. (see SOP for Patient Consultation Guide and Cannabis Consult Recommendation)

e. PMP will place a note in the Additional Medical Marijuana Patient Information section detailing if counseling was done at Bloc or another pharmacy and the QMP's recommendation excluding all medical condition information.
f. PMP will apply the appropriate phot icon. (see SOP for Pharmacist Transaction Verification)
g. PMP will fill out the Cannabis Consult Recommendation when needed to communicate dosing guidelines and limits per QMP to the PCA's on the sales floor. (see SOP for Cannabis Consult Recommendation)

MONITORING:

- Pharmacist-in-Charge (PIC) will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

INVENTORY REPORTS

PURPOSE: In order to be in compliance with Department of Agriculture regulations, a physical copy of the completed inventory must be kept on hand at all times. A limited access employee will have access to the binder in the safe where inventory sheets are stored. All employees involved in the inventory count must sign the report.

SCOPE: All JG Utah, LLC ("JG Utah") employees who are completing inventory counts.

INSTRUCTIONS:

SET UP COUNT SHEET/DISCREPANCY REPORT

1. From the MJ Freeway System software, go to "Analytics"
2. Select the Facility in the top right drop down.
3. Select "Inventory Transactions" and choose the previous month's dates.
4. Complete Monthly Summary Report calculations.
5. Run the current inventory report for the day the reports are down (1st of every month at 5am).
6. Reconcile Item Quantity with the Quantity on Hand.
7. Investigation and reconciliation of any discrepancies must be completed within 24 hours.
8. The state will be notified of any major discrepancies that cannot be reconciled.
9. Monthly reports will be uploaded to Monthly Inventory Report Folder in OneDrive.
10. All Reports will be maintained in OneDrive for a minimum of 5 years.

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTIONS:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

GENERAL TRAINING REQUIREMENTS

PURPOSE: All employees must complete Utah Department of Agriculture requirements as well as JG Utah, LLC (JG Utah) training requirements to maintain employment.

SCOPE: All JG Utah employees.

INSTRUCTIONS:

All Employees

- Apply for registration with the Utah Department of Ag to act as a Pharmacy Agent;
    - Complete the application;
    - Complete the state required Agent Certification course.
    - Pay the application fee (to be covered or reimbursed by JG Utah);
    - The application and the receipt must be submitted to the General Manager and will be filed in our secure administrative office and scanned into our secure, encrypted server.
- Must pass a criminal background check/fingerprint analysis, at both the State and Federal level.
    - Each prospective cannabis pharmacy agent must:
        - Submit a fingerprint card in a form acceptable to the Utah Department of Public Safety; and
- All agents are required to complete the online training for the seed-to-sale software MJ Freeway at: https://budtender.training/tracks/a6ba5bd2-875b-11eb-8dcd-0242ac130003/classes/mj_platform
- All agents will receive security and emergency procedure training, following all outlined SOPs and the instruction of the Security Director and our security contractor. Training will be held annually for all employees.
- All employees will be trained in the following:
    - Patient Care
    - Regulatory Compliance
    - Site Cleaning
    - POS Transactions
    - Cash Management

- General Operations

Pharmacist

- Any licensed pharmacist employed by JG Utah must complete a 4-hr training course, required by the Department of Agriculture at: https://medicalcannabis.utah.gov/providers/continuing-education/
- Pharmacists will be required to maintain their UT Board of Pharmacy License in good standing, completing any continuing education that may be necessary to do so.
- Copies of current licensing must be provided to JG Utah and will be maintained on-site in physical and digital form.

Security Guards

- Security Officers must obtain any and all training and licenses required to maintain best practices in the performance of their duties as Security Guards. (See JG Utah Security Guard Policy)

Additional Training

- JG Utah pharmacists are charged with acquiring up to date information on products, strains, symptom alleviation, and devices based on the most current information available.
- Staff is encouraged to attend outside educational seminars (e.g. Hemp Staff training) though this is not required for employment.

MONITORING:

- Upper Management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

Customer Consultation – Pharmacist In Charge Duties

PURPOSE: All Pharmacists in Charge must comply with Utah Department of Agriculture requirements as well as JG Utah, LLC (JG Utah) training requirements to maintain employment.

SCOPE: All JG Utah PICs.

INSTRUCTIONS:

Pharmacist in Charge:

1. A medical cannabis pharmacy's pharmacist-in-charge (PIC) shall have the responsibility to oversee the medical cannabis pharmacy's operation, and that it is in compliance with Chapter 26, Title 61a, Utah Medical Cannabis Act and Utah Administrative Rules R380-400 through R380-411, Utah Medical Cannabis Act Rules. The PIC shall generally supervise the medical cannabis pharmacy, though the PIC is not required to be on site during all business hours.
2. A unique email address shall be established by the PIC, or responsible party, for the medical cannabis pharmacy; to be used for self-audits or medical cannabis pharmacy alerts, initiated by the Department. The PIC or responsible party shall notify the Department of the medical cannabis pharmacy's email address in the initial application for licensure.
3. The duties of the PIC shall include:
    a. ensure that PMPs, and pharmacy agents, at the medical cannabis pharmacy appropriately interpret and distribute a recommendation, in a suitable container, appropriately labeled for subsequent administration, or use by a patient;
    b. ensure that medical cannabis and a medical cannabis device are distributed safely, and accurately, with correct dosage parameters as recommended;
    c. ensure that medical cannabis, and a medical cannabis device, is distributed with information and instruction as necessary for proper utilization;
    d. ensure that PMPs and pharmacy agents communicate to a cardholder, at their request, information concerning any medical cannabis or medical cannabis device distributed to the cardholder;
    e. ensure that a reasonable effort is made to obtain, protect, record, and maintain patient records;
    f. education and training of medical cannabis pharmacy personnel;
    g. establishment of polices for procurement of medical cannabis, a medical cannabis device, and educational material sold at the facility;
    h. distribution and disposal of medical cannabis and a medical cannabis device, from a medical cannabis pharmacy;
    i. appropriate storage of all medical cannabis and a medical cannabis device;
    j. a record of transactions of the medical cannabis pharmacy necessary to maintain accurate control and accountability for materials required by applicable state laws;

k. establish effective control against theft or diversion of medical cannabis or a medical cannabis device, and record of such product;

l. legal operation of the medical cannabis pharmacy, including inspections, and other requirements, of state laws governing the medical cannabis pharmacies;

m. implementation of an ongoing quality assurance program, that monitors performance of the personnel at the medical cannabis pharmacy;

n. ensure that the point of sale (POS) is in working order;

o. ensure that relevant information is submitted to the state's ICS and EVS in a timely manner;

p. ensure that medical cannabis pharmacy personnel have appropriate licensure and registration;

q. ensure that no medical cannabis pharmacy operates with a ratio of medical cannabis pharmacy medical provider to pharmacy agents that results in, or reasonably would be expected to result in, a reasonable risk of harm to public health, safety, and welfare;

r. ensure that the PIC assigned to the medical cannabis pharmacy is recorded with the Department, and the Department is notified of a PIC change within 30 days of the change; and

s. ensure with regard to the unique email address used for self-audits or medical cannabis pharmacy alerts, that:

i. the medical cannabis pharmacy uses a single email address; and

ii. the medical cannabis pharmacy notifies the Department, on the form prescribed, of any change in the email address within seven calendar days of the change.

4. A PMP cannot be designated as PIC, for more than two medical cannabis pharmacies at one time.

5. The PIC, or designated pharmacist on-site, will review every transaction on site as required by the sate.

6. The pharmacy will always be under the full and actual charge of the PIC, but it shall be under the direct supervision of at least one supervising PMP, who is physically present at all times when a medical cannabis pharmacy is open to the public.

7. The pharmacy PIC is not required to be in the medical cannabis pharmacy at all times, but shall be available for contact within a reasonable period with the supervising PMP.

8. The pharmacy shall never operate with a supervision ratio of PMP to pharmacy agent that results in, or reasonably would be expected to result in, an unreasonable risk of harm to public health, safety, and welfare.

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

PMP Duties and Bloc Customer Consultation Procedures

1. Each new cardholder will schedule a 15-30 minute consultation on-line, over the phone or as a walk-in.
2. Pharmacists (PMPs) will use EVS to verify patient's RMP recommendation.
3. Pharmacists (PMPs) shall review the questions on the Bloc Pharmacist Consultation Guideline that address:
    a. Discuss medical history and qualifying condition
    b. Discuss goals of treatment
    c. Obtain current medication profile
    d. Obtain history of cannabis use
    e. Review QMP limits, restrictions, and recommendations
    f. Review cannabinoids and terpenes
    g. Review dosage forms, onset times, durations, and dosing recommendations
    h. Discuss bi-phasic dosing and tolerance
    i. Discuss dependence and addiction
    j. Discuss legal uses, storage, driving, public consumption, labels, etc.
    k. Discuss accidental ingestion and THC toxicity and safety (see guide)
    l. Discuss recommendation and next steps (follow-ups, ordering, website)
    m. Fill out Cannabis Consult Recommendation card for patient
4. Pharmacy Agents may not counsel patients regarding their medical conditions. Agents will use the Cannabis Consult Recommendation form from the PMP to help advise patients on products.
5. During hours of operation that are seen to have a high volume of orders, two PMPs will be present. One will conduct patient consultations and one will verify patient purchases and check EVS to verify/calculate that the patient is authorized to make a purchase.

Customer Consultation – Pharmacy Agent Duties

PURPOSE: All pharmacy agents must comply with Utah Department of Agriculture requirements as well as JG Utah, LLC (JG Utah) training requirements to maintain employment.

SCOPE: All JG Utah pharmacy agents.

INSTRUCTIONS:

All Pharmacy Agents:

1. A pharmacy agent may perform the following duties:
    a. within the dosage parameters specified by a QMP or PMP, assist the cardholder with understanding available products, proper use of a medical device, medical cannabis strains, and methods of consumption or application;
    b. using the ICS, verify the status of an individual's medical cannabis card, and dosage parameters in a patient recommendation;
    c. enter and retrieve information from the ICS;
    d. authorize entry of a cardholder into the cardholder counseling area;
    e. provide pricing and product information;
    f. accurately process cardholder payment, including issuance of receipt, refund, credit, and cash;
    g. prepare labeling for product;
    h. retrieve medical cannabis, and medical cannabis device, from inventory;
    i. accept new medical cannabis, or medical cannabis device, orders left on voicemail for a PMP to review;
    j. verbally offer to a cardholder, the opportunity for counseling with a PMP regarding medical cannabis, or a medical cannabis device;
    k. assist with dispensing of product to a cardholder;
    l. screen calls for a PMP;
    m. prepare inventory of medical cannabis, and medical cannabis device;
    n. assist with maintaining a safe, clean, and professional environment.
    o. access patient information in the EVS; and
    p. view medical treatment, and medication history, in the EVS
2. A pharmacy agent shall not perform the following duties:
    a. receive dosage parameters for a patient's recommendation over the phone, or in person;

b. determine, or modify, dosage parameters in a patient's recommendation; or

c. provide counseling, or consultation, regarding a patient's medical condition, or medical treatment.

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

Pharmacist Transaction Recommendation Verification

Purpose: Procedure for all JG Utah Pharmacists (PMP's) and Pharmacy Agents to abide by the laws governing cannabis sales in Utah.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") employees working in our medical cannabis pharmacy facility who will be completing sales and customer check-ins.

Instructions:

1. PMP will review every patient's profile/recommendation in EVS when they initially register with the pharmacy and place a note at the bottom of the profile that the review has been completed and the date it was completed. PMP will also verify the correct RMP is listed in the patient's profile.

2. PMP will review the patient's recommendation, make note, and insert an icon photo alert on patients' profiles who have any specific guidelines on their recommendation from their RMP.

3. Pharmacy Agent at check-in will notify the PMP when the patient has an icon photo alert (ex. red thumb or no vaping).

4. PMP will send in the Teams chat how much the patient is able to purchase on that visit based on the RMP's recommendation/restrictions.

5. PMP on duty is responsible for ensuring that each patient's purchase abides by the patient's legal allotment.

6. PMP stationed at POS will monitor the queue and verify patients' recommends in EVS when they are checked in and verify patient orders at POS.

7. Pharmacy agent will notify the PMP on duty in the Teams chat when a patient has renewed their med card.

8. PMP will verify patient's RMP and recommendation with every renewal and make any required updates to the patient's profile.

MONITORING:

- Pharmacist-in-Charge (PIC) will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

LMP PAPERWORK

PURPOSE: To outline procedure for entering LMP paperwork.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") PMPs.

INSTRUCTIONS:

1. After patient drops off paperwork, verify all required information has been filled out.
2. Call the doctor's office to verify the forms.
3. Document all calls/contact with the office and patient on the paperwork.
4. If paperwork is emailed to qmp proxy email address, calling the office to verify is not necessary.
5. Enter the recommendation into EVS.
6. Upload form into EVS.
7. Call patient to notify them that that are in awaiting payment and they need to pay the $15 state fee.
8. If an agent receives the paperwork from a patient while PMP is in a consult, it must be given to the PMP on duty as soon as possible. Agents have been educated on the process.
9. All LMP paperwork should be entered into EVS within 24 hours of verification.

MONITORING:

- PIC will monitor PMPs to ensure adherence to the outlined procedure.

Pharmacist Requesting a Recommendation Change

Purpose: Procedure for all JG Utah Pharmacists (PMP's) and Pharmacy PMPs to abide by the laws governing cannabis sales in Utah.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") PMPs working in our medical cannabis pharmacy facility located in South Jordan, UT (Bloc Pharmacy) who will be reviewing patients' recommendations.

Instructions:

1. PMP will review every patient's profile/recommendation in EVS at least every six months and place a note at the bottom of the profile that the review has been completed and the date it was completed.
2. If a patient wishes to receive a type of product that is NOT listed in their EVS profile, the PMP will contact the patient's provider to try to obtain approval for the patient to purchase and use that form of cannabis.
3. The PMP will attempt to email and call the provider.
4. If the provider calls back, we will discuss the patient's request with the provider.
5. If the provider approves of the request/change over the phone only, the PMP will notify the provider that a follow-up email will be sent to the provider, so a written approval response.
6. If the provider responds via email with the approval, then no further communication is required.
7. The PMP will request that the provider update EVS. However, in case the update is not completed by the provider, the PMP will place a note in MJ Freeway, Dutchie, and the Notes section of EVS.
8. If the request is approved, the PMP will notify the patient that they may purchase and use the form they are requesting to use.
9. If the provider denies the request, the PMP will notify the patient that the request was denied.

MONITORING:

- Pharmacist-in-Charge (PIC) will monitor PMPs to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any PMP found not following the procedures in this SOP.
2. Instruct PMP on corrective action.

DAILY STAFFING

PURPOSE: To ensure proper staffing to ensure a PMP is always present when the pharmacy is open and allow for a reasonable ratio of agents to pharmacists.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") pharmacies, pharmacists and agents.

INSTRUCTIONS:

1. Bloc cannabis pharmacy shall not distribute medical cannabis, or a medical cannabis device, to a medical cannabis cardholder, unless an employee who is a PMP is physically present and immediately available in the medical cannabis pharmacy.
2. Scheduling of PMPs to allow for overlap during the busiest hours (12p to 8p) also ensuring an adequate ratio of PMPs to agents.
3. Overlap allows one PMP to focus on consults and the other PMP to focus on patients with limits and new patients that do not require a consult.
4. Typical ratio does not exceed 1:5 (PMP:agent) excluding GM, AGM, Inventory Coordinator and Security.
5. No staff may access the pharmacy after hours alone.
6. It is mandatory that there must always be at least two employees in the pharmacy (one must be a security guard).
7. The GM, AGM, Supervisor, or PIC may enter an hour before opening to prepare the store, but there must be at least two employees present to enter the pharmacy. No one may enter alone.
8. Employees may remain after the pharmacy closes to perform close of business duties.
9. Employees and Security Guard will leave together and arm the pharmacy before leaving.
10. All staff must always have their Department of Agriculture (agents) or Department of Health and Human Services (pharmacists) credentials when on duty in the pharmacy.
11. A supervisor will check all agents possess their credentials before their shift starts.

MONITORING:

- PIC and Upper Management will ensure adherence to the outlined procedure.

STOARGE OF EMPLOYEE LISTS

PURPOSE: To abide but state laws that require a procedure for storing employees lists.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") pharmacies with the aid of the national HR team

INSTRUCTIONS:

(a)the medical cannabis pharmacy, or parent company, shall maintain a record of not less than five years, of the initials or identification codes that identify each PMP or pharmacy agent by name.

(b)the initial or identification code, shall be unique, to ensure that each PMP, or pharmacy agent, can be identified. Company issues a unique employee number to each employee. Employee's state agent number which is unique to them will also be kept on file.

(c) all employee identifiers will be keep digitally for at least five years.

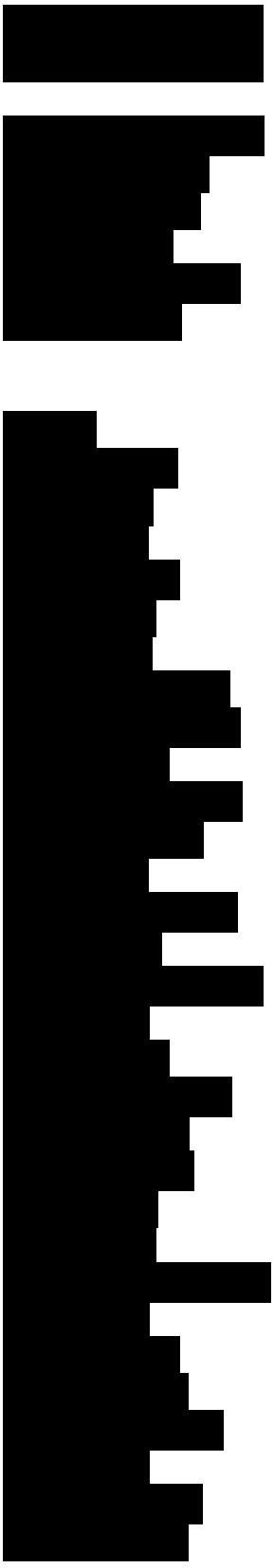
(d) PAFs (personnel action form) are kept on file with HR tracking all hiring and termination dates and an employee list will also be stored in the pharmacy's operating plan in One Drive.

(e) Pharmacy will notify UDAF when an employee has been terminated

MONITORING:

- National JG Human Resources and Upper Management department will ensure adherence to the outlined procedure.

Bloc South Jordan Employee List (Updated)



[redacted]

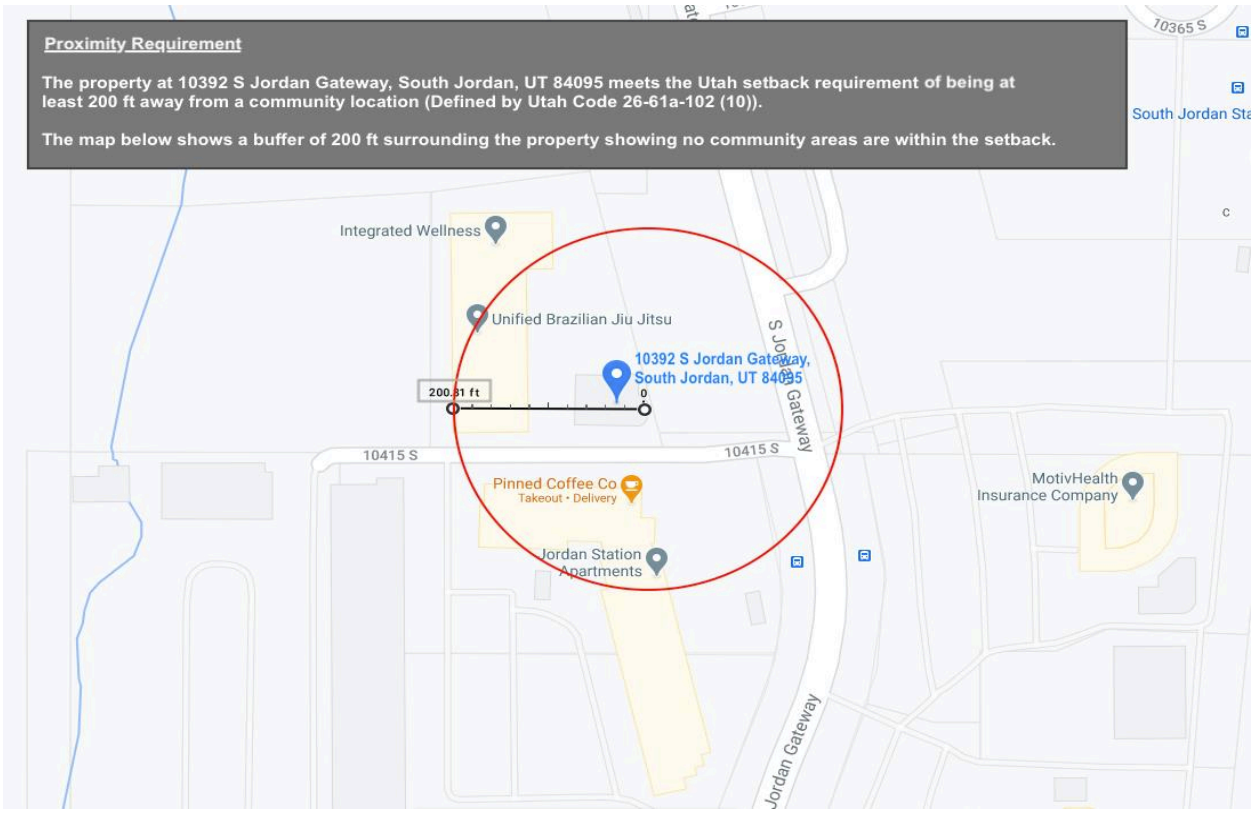
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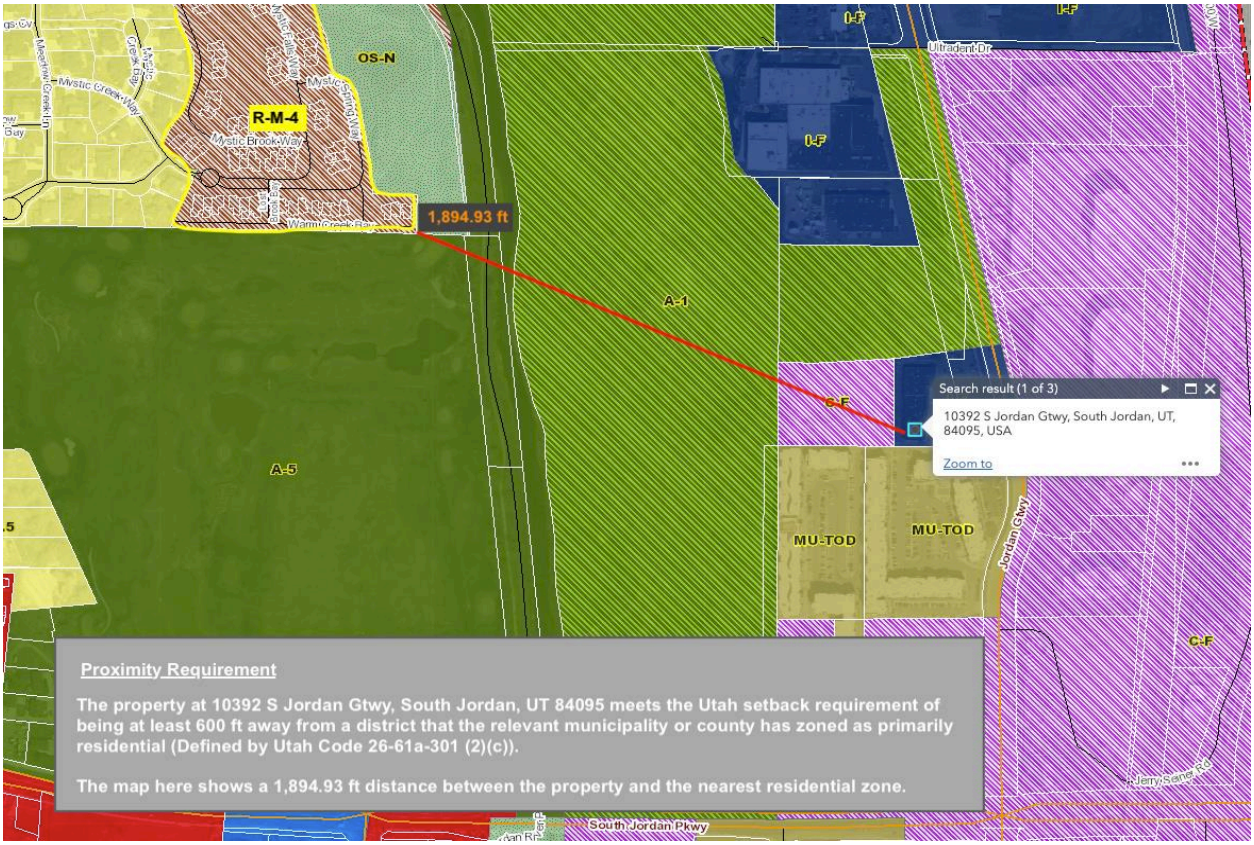
Agent (Inventory Team):

[redacted]

PMP

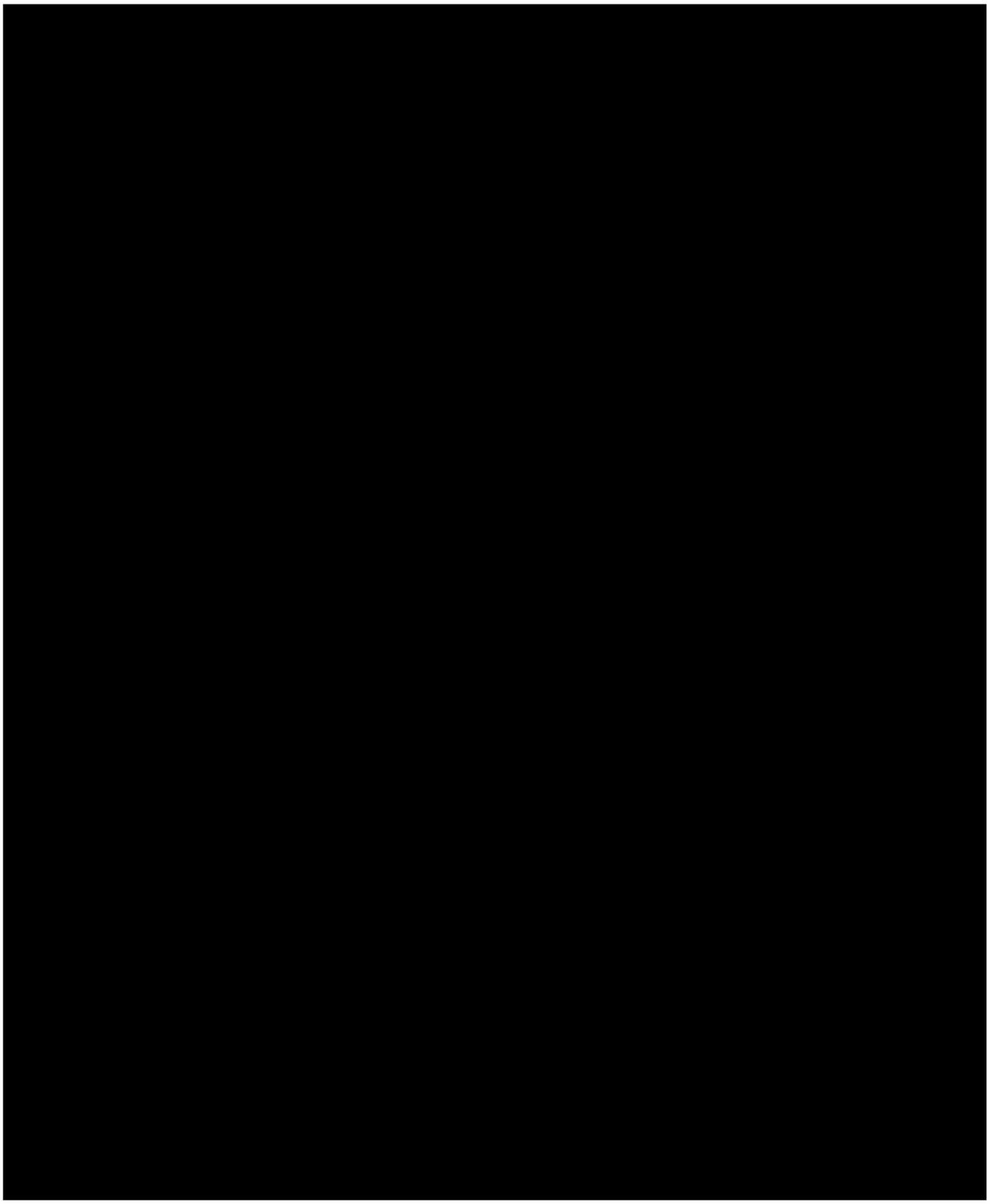
[redacted]


Proximity Requirement
The property at 10392 S Jordan Gateway, South Jordan, UT 84095 meets the Utah setback requirement of being at least 200 ft away from a community location (Defined by Utah Code 26-61a-102 (10)).
The map below shows a buffer of 200 ft surrounding the property showing no community areas are within the setback.
10365 S
South Jordan Sta
Integrated Wellness
Unified Brazilian Jiu Jitsu
10392 S Jordan Gateway, South Jordan, UT 84095
200.31 ft
0
S Jordan Gateway
10415 S
10415 S
Pinned Coffee Co
Takeout • Delivery
MotivHealth Insurance Company
Jordan Station Apartments
Jordan Gateway


OS-N
R-M-4
Mystic Brook Way
1,894.93 ft
A-1
A-5
I-F
Utradent Dr
Search result (1 of 3)
10392 S Jordan Gtwy, South Jordan, UT, 84095, USA
Zoom to
MU-TOD
MU-TOD
Jordan Gtwy
C-F
Proximity Requirement
The property at 10392 S Jordan Gtwy, South Jordan, UT 84095 meets the Utah setback requirement of being at least 600 ft away from a district that the relevant municipality or county has zoned as primarily residential (Defined by Utah Code 26-61a-301 (2)(c)).
The map here shows a 1,894.93 ft distance between the property and the nearest residential zone.
South Jordan Pkwy

C = camera
C-FE = camera fish eye

MAIN FLOOR LAYOUT
NTS

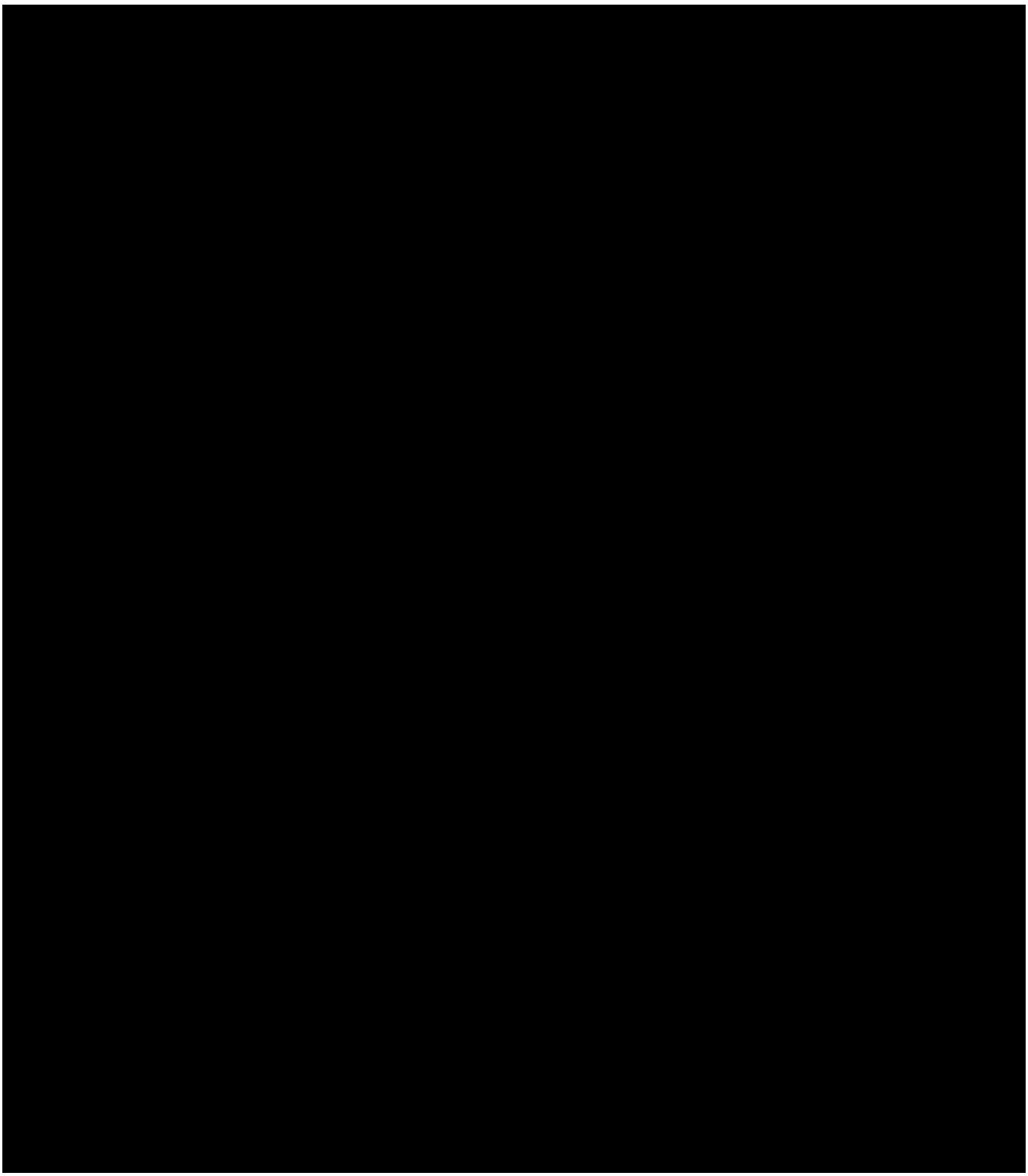


LOWER FLOOR LAYOUT

NTS

SECURITY AND SURVEILLANCE

PURPOSE: Security is of greatest importance to JG Utah, LLC ("JG Utah"). JG Utah has designed all operations to ensure the safety of employees and patients. During all business hours, Security Guards will be employed to ensure security at the pharmacy. They will follow the process outlined below.



[redacted]

[redacted]

MONITORING:

- Upper Management will monitor Security Guards and employees to ensure adherence to the outlined procedures.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action

CANABIS CONSUMPTION AT THE PHARMACY PROHIBITED

PURPOSE: To outline guidelines for patients and employees regarding cannabis use on the pharmacy premises. USE IS PROHIBITED.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") employees and customers.

INSTRUCTIONS:

(a) Patient use on the premises is prohibited
   a. Two security guards are on duty at all times while the pharmacy is open. Security monitors all patients inside and outside of the building.
   b. Staff and security will verbally notify patients if necessary.
   c. Patients are made aware that there is no cannabis use/consumption at the pharmacy or the outside patio.
   d. There is also signage on the door stating, "The prohibition of consuming marijuana for medical use in a public place."(picture included below)

(b) Employee use on the premises is prohibited. Below is taken from the JG Employee Handbook:

8.2 Cannabis Consumption in the Workplace Is Prohibited

All employees must ensure that their judgement and performance are never impaired by cannabis or any other legal or illegal substance. This is especially important for those whose jobs involve activities that could significantly impact their own or others' safety. Employees must ensure that the safe performance of their duties and their behavior are never compromised by the consumption of cannabis; and, that they never put themselves or others at risk.

For purposes of this policy, cannabis consumption in the workplace includes:

- The use of cannabis, and cannabis products
- Coming to work under the influence, even if the cannabis consumption did not occur during work hours. (Off-duty cannabis use, while generally not prohibited by this policy, must not interfere with an employee's ability to perform the essential functions of their job)
- Smoking and using cannabis products while on Company premises or anywhere on Company property
- Smoking and using cannabis products in a Company vehicle or while traveling on Company business

Employees are further prohibited from illegally manufacturing, cultivating, distributing, or dispensing cannabis aside from cannabis manufactured, cultivated, distributed, or dispensed as part of the Company's operations.

MONITORING:

- Upper management, security guards, and PIC will monitor employees and patients to ensure adherence to the outlined procedures/regulations.


NOTICE
NO FIREARMS OR WEAPONS ALLOWED ON THIS PROPERTY
NO SMOKING ON PREMISES
THE PROHIBITION OF CONSUMING MARIJUANA FOR MEDICAL USE IN A PUBLIC PLACE, INCLUDING THE DEFINITION OF WHAT CONSTITUTES A PUBLIC PLACE PURSUANT OF THIS RULE
AREA UNDER VIDEO SURVEILLANCE
MONITORED BY LOCAL POLICE
NO BACKPACKS, NO LARGE BAGS
ALL BAGS ARE SUBJECT TO RANDOM SEARCH

VENDOR/VISITOR/EMPLOYEE ENTRY PROCEDURES

PURPOSE: There may be visitors at the pharmacy that will include vendors, contractors, maintenance workers, "helping hands" etc. Potential patients and unregistered caregivers are not permitted entry into the facility as no one without a MMJ patient or caregiver card is permitted access. Patients requiring assistance will be permitted one individual ("helping hand") to assist them. The entire facility is limited access and only open to those who have a MMJ patient or caregiver card. If visitors require admittance to limited access areas, they must present a valid government-issued identification, sign a Visitors Log, and wear an identification badge. Visitors to limited access areas will be accompanied at all times and may not touch any medical marijuana product.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah"). employees who will be logging, escorting or interacting with visitors throughout their visit to the pharmacy.

INSTRUCTIONS:

Contractors, Vendors, and Visitors:

1. The visitor will arrive at the side door of the pharmacy where he/she will be seen on the surveillance camera.
2. "Helping Hands" will arrive at the main door of the pharmacy where he/she will be greeted by a PCA or Security Guard.
3. The visitor/vendor/contractor will be allowed entrance once they have shown valid identification and credentials have been entered into the visitor log.
4. The visitor's information will be entered into the Visitors' Log. The Log must include, the full name of the visitor, the visitor's identification number, the time of arrival, time of departure, visitor badge number, age or DOB, and purpose of the visit.

   NOTE: The log will be maintained by the pharmacy for 5 years and will be made available to the Department of Ag, state or local law enforcement, or other state or local government officials upon request if essential to performing the official's functions and duties. The Visitors' Log being stored on OneDrive will ensure JG UT can determine the security personnel who logged each visitor in and see any employee that modified the excel spreadsheet (log).

5. The visitor's government-issued identification must be verified by the PCA or Security Guard.
6. The visitor will be issued a badge that must be worn at all times while in the pharmacy. The identification badge must include a badge number.
7. Visitors may be permitted to visit limited access areas, but employees will ensure that visitors DO NOT touch medical marijuana products while in limited access areas.
8. Before departing, the Visitor's Badge must be returned. Departure time is entered into the log.
9.

Employee:

1. Employees must retain a copy of their pharmacy agent card and photo ID while on duty at the pharmacy.
2. Employees will use their door fob to enter the pharmacy through the back door.
3. Entrance and exit of employees will be tracked electronically when using fob to enter and exit the building.

NOTE: Authorized members of the Department of AG and HHS and members of law enforcement are not considered visitors and will be allowed access immediately upon presentation of proper identification. Upper Management will be available to accompany them.

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

EMPLOYEE THEFT

PURPOSE: JG Utah, LLC ("JG Utah") has implemented numerous measures to prevent any loss or theft of product. Should diversion be suspected, the PIC will immediately initiate a preliminary investigation. Any remaining discrepancy between the physical product and electronic inventory will result in a thorough investigation.

SCOPE: This procedure applies to all JG Utah employees.

INSTRUCTIONS:

1. Access to the vault will be limited to prevent diversion/theft. Only one agent will be assigned to stock per shift. This will usually be a PCA2. Supervisors, AGM and GM also have access to stock.
2. Should there be a discrepancy, a preliminary investigation will be initiated.
3. Any employee who had access to the inventory will be questioned/consulted.
4. Security Guards will be consulted.
5. If the discrepancy cannot be resolved, a thorough investigation will be conducted. If criminal activity or diversion are suspected, the Department of Agriculture will be notified, and the local authorities contacted.
6. Any employee involved will be removed from the work schedule and isolated from inventory access.
7. In limited circumstances, the employee will be given a warning and after re-training will be allowed to return to work.
8. In most circumstances, in order to ensure public safety, compel regulatory compliance, protect the integrity of the security system and maintain the JG Utah reputation, the company will terminate its relationship with the employee.

MONITORING:

- Upper management a will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action

MEDICAL CANNABIS WASTE MANAGEMENT

PURPOSE: To ensure the secure and safe destruction of medical cannabis waste.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") employees who will be handling expired, damaged, mislabeled, opened products, or any other medical cannabis waste.

INSTRUCTIONS:

1. Cannabis waste products/defective products are placed in a Ziploc bag and marked with the date of isolation.
2. The Ziploc bag is then placed in the safe labeled "QUARANTINED PRODUCT NOT FOR SALE OR USE" located in the Vault pending disposal.
3. The Inventory Coordinator will move the products from Active MJ inventory into the Destruction/Defectives room in MJ by performing a split-package. He will then add the product to the Destruction Log (Excel spreadsheet).
4. Using the Destruction Log Excel form – Enter all fields on the form. The log will include: (1) return date; (2) destruction date; (3) type of the cannabis product; (4) the manufacturer, name of product/strain, weight, batch number and quantity; (5) the reason for disposal; (6) the method of destruction/disposal.
5. Riverside Products are placed back into the safe in the vault that is labeled "QUARANTINED PRODUCT NOT FOR SALE OR USE" until they are returned to the manufacturer. A sales order will be made to transfer the defective products back to the manufacturer. When the transfer is picked up and completed the products will be removed from the Defectives room in MJ. Riverside products are the only defective products that are returned to the manufacturer.
6. [redacted].
12. PIC enters his/her name, PMP license number, destruction date and time into the Destruction Log, and also removes all of the items from the Destruction/Defectives room in MJ inventory.

MONITORING:

- PIC and Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTIONS:

1. Retrain any employee found not following the procedures in this SOP
2. Instruct employee on corrective action

RECALL PROTOCOLS

PURPOSE: To ensure the safety of patients and quality of medical marijuana product at JG Utah, LLC ("JG Utah"). To efficiently and safely return all affected product to the Grower/Processer (G/P).

SCOPE: This procedure applies to all JG Utah employees who will be handling product recalls.

INSTRUCTIONS:

Once JG Utah receives notification from a patient, caregiver or practitioner that an adverse event occurred:

1. Notify the Pharmacist-in-Charge ("PIC")/Upper Management who shall act as the Recall Coordinator.
2. The Recall Coordinator will immediately contact the Department, Utah Department of Agriculture and Food, and the cannabis production establishment from which it obtained the cannabis product in question.
3. Pharmacist/Upper Management will consult with G/P to determine the specific batches/ lots that may be affected.
4. Employees will begin identifying and isolating any potentially affected product.
5. All potentially affected product will be removed from inventory. A limited access employee will deliver the quarantined product to the lock box in the vault labeled 'Hazardous Waste/Recall Product' and ensure the lock box is secure.
6. Utilizing MJ Freeway seed–to–sale software, employees will run a search for all potentially affected product sold from the potentially affected batch.
7. All available employees will contact patients who have been sold the affected product.
8. Contacted patients will be given instructions for immediate product return.
9. Upon receipt of returned product, a limited access employee will deliver the quarantined product to the lock box in the vault labeled 'Quarantined Product' and ensure the lock box is secure.
10. JG Utah will coordinate the return of affected product to the G/P.
11. Log the affected product as quarantined/recalled in MJ Freeway software.
12. Products are placed into the safe in the vault that is labeled "QUARANTINED PRODUCT NOT FOR SALE OR USE" until they are returned to the manufacturer. A sales order will be made to transfer the defective products back to the manufacturer. When the transfer is picked up and completed the products will be removed from the MJ.

Recalls and products being returned to processor the inventory coordinator will:

1. Initiate a transfer in MJ Freeway and set it to "out for delivery".
2. When the manufacturer arrives, it will be removed from the quarantine safe.

3. Paperwork will be completed/signed by inventory coordinator and driver picking up recalled product.

If mandatory or voluntary recall confirmed with Dept. of Ag. and/or G/P:

1. Employees will begin identifying and isolating any potentially affected product.
2. Utilizing the MJ Freeway, employees will run a search for all potentially affected product sold from the potentially affected batch.

Patient Communications:

1. The Recall Coordinator will direct all available employees will contact patients by phone who have been sold the affected product.
2. Any purchaser contacted will be provided with the following information: (1) The name and serial numbers of the recalled products, and the date when the recalled products were sold; (2) Whether the recall was mandatory or voluntary; (3) The reason for the recall and whether any health concerns exist; and (4) Procedures for return of the affected products.
3. Patients will be asked for their e-mail and mailing address so that we may send any needed follow-up information.
4. The Recall Coordinator ensure that a Recall Letter is sent to all affected purchasers by certified USPS including: (1) Our company name and contact information (telephone, e-mail, and mailing address); (2) The name and serial numbers of the recalled products, and the date when the recalled products were sold; (3) Whether the recall was mandatory or voluntary; (4) The reason for the recall and whether any health concerns exist; (5) Procedures for quarantining the product and a direction not to use the products in question; and (6) Procedures for returning the product.
5. The Recall Coordinator will direct web developer to immediately post Recall Notice notification at the top of our webpage with a link to additional information. The link will be prominently and conspicuously displayed so that any browser of our website will immediately see the Recall Notice.
6. Upon receipt of returned product, a limited access employee will deliver the quarantined product to the lock box in the vault labeled ‘Hazardous Waste/Recall Product’ and ensure the lock box is secure.

Product Quarantine:

JG Utah will coordinate the return of affected product with the G/P, but any affected products held or received by our facility will be quarantined according to the following procedures:

1. Upon receiving products requiring quarantine, Employees will inspect all the products and document the following information in our Recall Log: (1) Whether the container is damaged or defective; (2) The serial number of each product; (3) The originating entity (cultivation center, craft grower, infuser); (4) The date of sale to our dispensary and purchase by a customer (if applicable); (5) The likelihood of the spread of contamination to our facility or to other inventory; (6) Any health, sanitation, safety, or security threats posted by such products; and (7) Update our electronic inventory system to reflect the transfer of the products to the Quarantine Product Lock Box.
2. Following inspection, the Inventory Control Manager will store all affected cannabis products in the appropriately designated commercial-grade, lockable and air-tight storage bin for safe storage of the quarantined products ("Quarantine Product Lock Box").
3. The Quarantine Product Lock Box will be stored in the Vault Room.
4. Upper management will ensure that the lock box is secure and await further instruction from the Department.

MONITORING:

- The PIC (Recall Coordinator) and Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTIONS:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

INCOMING/OUTGOING PRODUCTS & RECEIVING/STORING INVENTORY

PURPOSE: To ensure that deliveries are being handled in an efficient and safe manner, following Department of Agriculture regulations and to avoid any potential diversion. JG Utah, LLC ("JG Utah") will be receiving inventory on a regular basis. To prevent loss or diversion upon delivery, inventory will be taken immediately upon receipt of product and compared to the transport manifest. Any person delivering product will be logged into the Visitors Log and accompanied at all times (see SOP, Visitors at the Pharmacy).

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") employees who will be accepting deliveries and receiving product into inventory.

INSTRUCTIONS:

1. Every delivery is scheduled prior to delivery.

2. The vendor will arrive at the side door of the pharmacy where he/she will be seen on the surveillance camera.

3. Security Guard will follow SOP guidelines for vendor/visitor entry procedures/check-in. He will allow them in to the delivery entrance check-in area.

4. Vendors must follow our visitor entry procedures/check-ins.

5. The Security Guard will alert Upper Management of the delivery's arrival.

6. Authorized personnel for receiving inventory are Upper management (AGM, GM, Supervisors, PIC, Inventory Coordinator) and inventory clerks.

7. Upper Management or an inventory clerk will help unload the delivery and will escort the delivery driver through the restricted access fob doors to the vault.

8. Deliveries will be counted and entered into MJ within 24 hours.

9. Upper Management and Inventory Coordinator will count product in the vault and verify incoming count matches the Transport Manifest received from the driver who is making the delivery. All manifests must be from the state mandated seed to sale system MJ Freeway.

10. Once the count is completed and product matches what is on the manifest, a Bloc employee and the delivery person will sign and date the Transport Manifest and retain a copy of the signed manifest for our records.

11. Upper management will immediately place items in the correct storage area within the vault.

12. Cameras will capture the delivery arriving outside, another camera at the delivery entrance check-in entrance area, two cameras in the hallway will follow it to the vault which also has a camera to capture the count/reconciliation of the manifest.

13. The delivery driver will be escorted out and upon leaving, vendor will return Visitor's badge, and time out will be entered on Visitor's log.

RECEIVING & STORING DELIVERY:

1. After the count and physical delivery of product to the items listed on the transport manifest is verified, Upper Management will inspect product to ensure that the warning label is on each package.

2. If there is any discrepancy between the product delivered and the product listed on the transport manifest, the GP must be contacted immediately, and the discrepancy reconciled.

3. If there is no discrepancy, the person making the delivery will be dismissed, his/her departure time will be noted on the Visitor's Log, and the badge returned.

4. Products will be sorted and stored in the appropriate vault location.

5. It will be sorted and stored in the appropriate vault location.

6. For products with multiple batches, determine which box has the soonest expiration date and sell those products first. An employee will verify the count, sign and date the other box.

7. Products will remain in the vault and the vault locked.

8. The accepted inventory will be logged into the seed-to-sale software ((MJ Freeway).

9. All products will be received into Dutchie also. Cannabinoid and Terpene amounts will be listed, so they transmit to the Dutchie online patient ordering system. A product back label will also be uploaded to the online ordering system.

OUTGOING PRODUCTS (to Dept of Ag or back to the Manufacturer):

1. For the Dept of Agriculture, Inventory Agent will locate the product the department is requesting a sample of.
2. For manufacturers, the Inventory Agent will place defective products in the quarantine safe until the manufacturer arrives to pick them up. For products that are not defective, they will be placed on the last row of shelves in the back corner of the vault until the manufacturer arrives.
3. Inventory Agent will create a transfer manifest in MJ Freeway for products being transferred out of the pharmacy and set it for "Out for Delivery".
4. When the manufacturer arrives, it will be removed from the quarantine safe or back shelves.
5. Inventory Agent will sign and date the transfer manifest as will the Dept of Agriculture representative or the courier for the manufacturer.

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.

2. Instruct employee on corrective action.

RECEIPTS AND LABELS

PURPOSE: To protect the safety of patients by ensuring receipts and labels contain appropriate and required information.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") employees working in our medical cannabis pharmacy facility who will be completing sales.

INSTRUCTIONS:

1. Complete the patient's order in the MJ Freeway seed-to-sale software.
2. Complete the transaction by collecting payment for the product.
3. Once payment is posted, the employee can print receipts for the products purchased in accordance with the requirements set forth by the Department of Agriculture.
4. The label will be printed and adhered to the products sold. Labels will contain the following:
    a. name of the grower/processor, address and permit number
    b. the name of the pharmacy, address and permit number
    c. the form and species of medical cannabis
    d. the percentage of THC and CBD contained in the medical cannabis product
    e. quantity of medical cannabis
    f. packaging date
    g. "use by" or expiration date
    h. the approved 'Warning'
    i. number of individual doses
    j. instructions for the proper storage
5. The receipt will be printed and given to the patient or caregiver. All receipts must contain the following:
    a. The name, address and any permit number assigned to the pharmacy.
    b. The name and address of the patient and, if applicable, the patient's caregiver.
    c. The date the medical marijuana was dispensed.
    d. The form and the quantity of medical cannabis dispensed.
    e. To ensure that all patients receive access to the information as outlined in 4-41a-1101(12)(i) and 26B-4-201(41), the link to the new UDAF patient insert is included on the bottom of every patient's receipt (medicalcannabis.utah.gov/info) and the QR code link has been placed at every POS register.

i. Printed copies will be available in the pharmacists' office in the information handout file folders for all patients that do not have access to the internet or patients who request a hard copy of the insert.

6. The product(s) will be placed in an opaque bag. The bag will then be given to the patient or caregiver.

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP
2. Instruct employee on corrective action

INVENTORY MANAGEMENT

PURPOSE: Inventory management is vital to the operation of the business. Strict adherence to JG Utah, LLC ("JG Utah") inventory policy will be upheld

SCOPE: This procedure applies to all JG Utah. employees.

INSTRUCTIONS:

Vault:

1. All products must be stored in the vault, what is needed for the day will be transferred to the sales floor display cases and behind the POS stations before the start of business and then returned to the vault upon closing.

2. Display cases will be locked; however, we will strive to have zero live products in the cases.

3. The product will be stored in the vault by type of product then by the grower/manufacturer.

4. The smallest bins available should be used to accommodate the product that is in stock.

5. If product is pulled from the bin, the quantity on the front of the bin/box must be changed accordingly.

6. If there are multiple sku's for each item then the two sku's must be separated by a divider within the bin. One batch will be sold in its entirety before selling the next batch.

7. The sku/batch that expires first must be sold first.

Sales Floor:

1. Product bins from behind the POS stations are taken into the vault at the end of each business day and stored on shelves designated for the POS product bins.

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTIONS:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

POINT OF SALE PROCEDURES (MJ FREEWAY)/

PURPOSE: To ensure that all employees are completing sales in a consistent and timely manner, while following Department of Agriculture regulations.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") employees working in our medical cannabis pharmacy facility who will be completing sales.

INSTRUCTIONS:

1. Navigate to MJ Freeway by opening Google Chrome and going to mjplatform.com.
2. Log in with assigned Username and Password.
3. Set 'Register', by navigating to the person icon in the upper right corner. Select the icon and then 'Select' the register that sales will be completed on.
4. Select 'Queue' from the welcome screen or by navigating to the tool drawer/waffle in the upper left. The queue will allow the employee to see all the patients in the dispensary that need to be seen.
5. Select the appropriate patient from the queue and select 'Product Menu' to begin building the patients sale.
6. Scan Sku to identify the product if possible. If a scan is not possible, contact a supervisor or the inventory manager.
7. Pharmacy may only sell the approved state product types from licensed state vendors. Pharmacy will NOT sell any type of smokable product.
8. Enter the amount of product the patient is purchasing. NOTE: concentrates and flower get fulfilled in weight and every other product will be filled in quantity.
9. When the product(s) the patient is purchasing are listed, select 'Fulfill'.
10. The products now need to be taken out of inventory. Complete the drop downs under each product on the 'Fulfill' page.
11. Once the product is taken out of inventory, select 'Update Cart'
12. If the patient is eligible for a discount select 'Fetch Coupons', and select the applicable discount from the drop down. Once selected, select 'Apply Coupon'.
13. After the patient's discount is applied, or if they aren't eligible for a discount "Select Payment/Printing".
14. Patient has three payment options: Debit, Pay by Bank and Cash.
15. If the patient is paying with Cash, then in the row for 'Cash' enter the total amount of cash received from the patient. Select 'Complete Payment'
16. If patient is using Pay by Bank, agent will select Dutchie Pay tab.
17. Patient then scans their Pay by Bank QR code on their phone to complete the payment.

18. If the patient is paying with a Debit Card using the Skylight debit terminal, then the agent will select the debit card/other payment tab.
19. Agent will enter the exact total amount of the purchase in the row for ‘Debit.’ Select ‘Complete Payment’.
20. Skylight Debit Reader allows the patient one option of payment: debit card use.
21. Patient’s Debit Card is never handled by the PCA, only the patient. Patient will manage the use of their phone.
22. PCA will retain Debit receipts that prints for Bloc’s record keeping purposes.
23. Before patient leaves, make sure they receive labels and a receipt from the Dutchie sales system.
24. All sales in MJ Freeway are transmitted to the state Electronic Verification System (EVS).

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

MJ Freeway System Down Protocol

Purpose: Procedure for all JG Utah employees to follow when the MJ Freeway system or the internet is down, so that customers will not go without their needed medications.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") employees working in our medical cannabis pharmacy facility who will be completing sales.

Instructions:

1. If MJ Freeway is down, the Pharmacy Agent will verify customers medical cannabis patient card and government issued photo ID.
2. PMP will check EVS to view customers recommendation and recent purchasing history.
3. In the event that EVS is also down or JG UT pharmacy's internet is down, then the PMP will advise the Pharmacy Agents to notify customers that the system is down and purchases will be limited based on the PMP's discretion. Customers will not be able to purchase a full 30 day supply.
4. Sales information in electronic verification system (EVS)
    a. Check the notes tab in the EVS to determine if the patient purchased a product that was not recorded in the inventory control system during the outage.
    b. Check the patient's purchase history in the EVS and calculate the total amount of medical cannabis product that the patient purchased in the past 28 days, including any product noted in the EVS notes tab during the present inventory control system outage.
    c. Refuse the sale of the product to the patient if the sale will result in the patient receiving more product than the legal dosage limit as defined in Utah Code Ann. 26-61a-102.
    d. Product may be sold to the patient as long as it can be verified in the EVS that the sale would not result in the patient receiving more product than the legal dosage limit.
    e. Enter the following information in the EVS notes tab associated with the patient making the purchase immediately after selling any product or device:
        i. Select note type "ICS Outage Sale."
        ii. For "Note name" enter the pharmacy name and location.
        iii. For "Correspondence date" enter the date of sale. ● In the "Comment field" enter:
        iv. The time of each purchase.
        v. The quantity and type of product or device purchased. This should include sufficient information regarding a product's weight and THC level so the legal dosage limit may be calculated by another medical cannabis pharmacy.
        vi. An identification code unique to the medical cannabis pharmacy agent or pharmacy medical provider making the notation.
        vii. Mark "no" to the private note question.
5. All information that state law requires to be collected about the sale of a product or device must be recorded, even during an inventory control system outage. Information

may be recorded on paper or electronic records as outlined in the pharmacy's standard operating procedure.

6. With the approval/permission from the state, if MJ Freeway is down, Bloc may complete the transaction in LeafLogix; however, the transaction MUST be completed in MJ Freeway as soon as it is back online.
7. As soon as MJ Freeway or the internet is back up, a pharmacy agent, using the receipts, will complete the sale in the MJ Freeway system.
8. All required information about the products and devices sold during the outage must be entered into the inventory control system within 72 hours after the outage is over.

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

INVENTORY CONTROLS(updated)

PURPOSE: Inventory management is vital to the operation of the business. Strict adherence to JG Utah, LLC ("JG Utah") inventory policy will be upheld which is why inventory controls have been put into place.

SCOPE: This procedure applies to all JG Utah employees.

INSTRUCTIONS:

Sales:

- All products must be processed through the state-mandated POS system and must be sold using a scanner.

Accepting Orders:

- All product that is received via grower/processor must be physically counted.
- All received product must be integrated into existing inventory via MJ Freeway.

Bi-Monthly Counts:

- To prevent diversion, inventory counts will be performed bi-monthly.
- Inventory counts will be completed on the 1st Tuesday of the month at 5am and on the 2nd or 3rd Tuesday of the month at 5 am. Typically the 3rd Tuesday of the month but may be the 2nd Tuesday due to holidays or marketing promotions.
- Investigation and reconciliation of any discrepancies must be completed within 24 hours.
- The state will be notified of any major discrepancies that cannot be reconciled.

Spot Checks:

- Spot checks are done daily on aged inventory and products with a low inventory quantity.
- Investigation and reconciliation of any discrepancies must be done within 24 hours.
- The state will be notified of any major discrepancies that cannot be reconciled.
- **High-Velocity Audits:** The inventory team will do a full audit the top 10 selling items daily. This ensures our highest-moving products are verified more in real time.
- **Zero-Lag Reconciliation:** Any discrepancy identified during the daily audit or at the point of sale will be reconciled within the same business day.
- **Trigger-Based Spot Checks:** In addition to scheduled audits, any manual inventory override or 'short' transaction will trigger an immediate physical count of that SKU to catch and correct human or system errors as soon as possible.

Inventory Procedure:

- For products with multiple batches, determine which box has the soonest expiration date and sell those products first. The other box an employee will verify the count, sign and date the box.
- When possible, bag products into smaller quantities to keep track of inventory. For example, gallon ziploc bags for the gel cubes. Gel cubes will be bagged in quantities of 5-10.

MONITORING:

- Inventory Coordinator and PIC will monitor employees to ensure adherence to the outlined procedure.
-

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

PROHIBIT SALE OF CERTAIN PRODUCTS

PURPOSE: To outline products that may not be sold at the pharmacy

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") employees, management and and PMPs.

INSTRUCTIONS:

1. Bloc cannabis pharmacy shall not dispense:
    a. Expired products,
    b. Damaged products,
    c. Deteriorated products,
    d. Misbranded products,
    e. Adulterated products, or
    f. opened medical cannabis products
2. The sku/batch that expires first must be sold first in order to prevent selling expired meds.
3. Any meds that are near expiration shall be placed on a spreadsheet and place a reminder in Teams Calendar to check the product on the day before the expiration date.
4. When stocking the POS, inventory clerk will check the expiration dates.

MONITORING:

- Upper Management and PIC will monitor employees and Inventory Coordinator to ensure adherence to the outlined procedure.

Patient Confidentiality

PURPOSE: All pharmacy agents must comply with Utah Department of Agriculture requirements as well as JG Utah, LLC (JG Utah) training requirements to maintain employment.

SCOPE: All JG Utah pharmacy agents.

INSTRUCTIONS:

1. Computer Screen Positioning to ensure patient confidentiality:
    a. POS computer screens will be positioned so that the screens are not visible to the public in order to protect patient information.
    b. Reception Desk computer for patient check-in will face away from the public allowing visibility solely to JG UT employee.
2. Paperwork or notes containing patient information:
    a. All JG UT employees will be trained on the proper disposal of any material containing patient information.
    b. All material containing patient information will be placed in the Shred-it receptacle for proper destruction/disposal.
    c. Shred-it will be scheduled for monthly destruction services.
3. All JG UT employees will be trained on the importance of patient confidentiality and instructed on best practices to maintain confidentiality.
    a. All JG UT employees will be required to follow HIPAA-like practices.
    b. Only state licensed agent will have access to cardholder data from the EVS system. Inventory team and Security team will not have access, since it is not needed for their daily work duties.

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.
- Upper management will maintain a checklist to ensure that each employee has completed the required trainings.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

Department of Agriculture and Food

KELLY PEHRSON
Commissioner

AMBER BROWN
Deputy Commissioner

DR. BRANDON FORSYTH
State Chemist
Director, Specialized Products Division

DEPARTMENT OF AGRICULTURE AND FOOD
Specialized Products Division
Operation Change Request Response

June 3, 2025

Dear Justice Grown (Bloc South Jordan),

The Utah Department of Agriculture, Medical Cannabis Program is providing the final approval for the following change request submitted on December 2, 2024.

There are currently five registers at the point of sale and an additional register at the drive through (total of 6 registers). We are requesting approval to add an additional four registers to the point of sale (total of 10 registers). I have included a drawing of the desired configuration. Two cameras will be added to cover the surveillance on the new registers. The swing door and a small section of the back wall will be removed.

This is the final approval.

Sincerely,

Aimee Isom
Program Manager I, Medical Cannabis

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State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

Department of Agriculture and Food

KELLY PEHRSON
Commissioner

AMBER BROWN
Deputy Commissioner

DR. BRANDON FORSYTH
State Chemist
Director, Specialized Products Division

DEPARTMENT OF AGRICULTURE AND FOOD
Specialized Products Division
Operation Change Request Response

June 4, 2025

Dear Justice Grown (Bloc South Jordan),

The Utah Department of Agriculture, Medical Cannabis Program is providing the final approval for the following change request submitted on June 3, 2025.

Submitting updated SOP to explain how we are ensuring every patient has access to the new patient information insert.
Answering state's email: Q: How do you plan to meet requirements related to the patient information insert. What options are planned to ensure all patients have access to the information as outlined in 4-41a-1101(12)(i) and 26B-4-201(41)?

This is the final approval.

Sincerely,

Aimee Isom
Program Manager I, Medical Cannabis

4315 South 2700 West - TSOB South Bldg, Floor 2 Taylorsville, Utah 84129-2128 • PO Box 146500, Salt Lake City, UT 84114-6500
Telephone 801-982-2200 • http://ag.utah.gov

State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

Department of Agriculture and Food

KELLY PEHRSON
Commissioner

AMBER BROWN
Deputy Commissioner

DR. BRANDON FORSYTH
State Chemist
Director, Specialized Products Division

DEPARTMENT OF AGRICULTURE AND FOOD
Specialized Products Division
Operation Change Request Response

June 18, 2025

Dear Justice Grown (Bloc South Jordan),

The Utah Department of Agriculture, Medical Cannabis Program is providing the final approval for the following change request submitted on 06/17/2025.

Submitting Change Request Procedure SOP for state approval.

This is the final approval.

Sincerely,

Aimee Isom
Program Manager I, Medical Cannabis

4315 South 2700 West - TSOB South Bldg, Floor 2 Taylorsville, Utah 84129-2128 • PO Box 146500, Salt Lake City, UT 84114-6500
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Commissioner

AMBER BROWN
Deputy Commissioner

DR. BRANDON FORSYTH
State Chemist
Director, Specialized Products Division

DEPARTMENT OF AGRICULTURE AND FOOD
Specialized Products Division
Operation Change Request Response

June 26, 2025

Dear Justice Grown (Bloc South Jordan),

The Utah Department of Agriculture, Medical Cannabis Program is providing the final approval for the following change request originally submitted on 6/24/2025.

Changing current Point of Sale-Receipts and Labels SOP to say labels will be placed in the patients bag: Line 4: The label(s) will be printed and placed in the patient's bag with the purchased products.

This is the final approval.

Sincerely,

Aimee Isom
Program Manager I, Medical Cannabis

State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

Department of Agriculture and Food

KELLY PEHRSON
Commissioner

AMBER BROWN
Deputy Commissioner

DR. BRANDON FORSYTH
State Chemist
Director, Specialized Products Division

DEPARTMENT OF AGRICULTURE AND FOOD
Specialized Products Division
Operation Change Request Response

08/19/2025

Dear Justice Grown (Bloc South Jordan),

The Utah Department of Agriculture, Medical Cannabis Program is providing the final denial for the following change request originally submitted on 08/05/2025.

Submitting updated SOP- Daily Staffing for approval.

This is final approval

Sincerely,

CL

Aimee Isom
Program Manager I, Medical Cannabis

State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

Department of Agriculture and Food

KELLY PEHRSON
Commissioner

AMBER BROWN
Deputy Commissioner

DR. BRANDON FORSYTH
State Chemist
Director, Specialized Products Division

DEPARTMENT OF AGRICULTURE AND FOOD
Specialized Products Division
Operation Change Request Response

08/19/2025

Dear Justice Grown (Bloc South Jordan),

The Utah Department of Agriculture, Medical Cannabis Program is providing the final denial for the following change request originally submitted on 08/05/2025.

Submitting updated SOP-Security and Surveillance for approval.

This is final approval

Sincerely,

CL

Aimee Isom
Program Manager I, Medical Cannabis

4315 South 2700 West - TSOB South Bldg, Floor 2 Taylorsville, Utah 84129-2128 • PO Box 146500, Salt Lake City, UT 84114-6500
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Department of Agriculture and Food

KELLY PEHRSON
Commissioner

AMBER BROWN
Deputy Commissioner

DR. BRANDON FORSYTH
State Chemist
Director, Specialized Products Division

DEPARTMENT OF AGRICULTURE AND FOOD
Specialized Products Division
Operation Change Request Response

08/19/2025

Dear Justice Grown (Bloc South Jordan),

The Utah Department of Agriculture, Medical Cannabis Program is providing the final denial for the following change request originally submitted on 08/05/2025.

Submitting updated SOP- Waste Management for approval.

This is final approval

Sincerely,

CL

Aimee Isom
Program Manager I, Medical Cannabis

4315 South 2700 West - TSOB South Bldg, Floor 2 Taylorsville, Utah 84129-2128 • PO Box 146500, Salt Lake City, UT 84114-6500
Telephone 801-982-2200 • http://ag.utah.gov

State of Utah

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DEIDRE M. HENDERSON
Lieutenant Governor

Department of Agriculture and Food

KELLY PEHRSON
Commissioner

AMBER BROWN
Deputy Commissioner

DR. BRANDON FORSYTH
State Chemist
Director, Specialized Products Division

DEPARTMENT OF AGRICULTURE AND FOOD
Specialized Products Division
Operation Change Request Response

09/18/2025

Dear Justice Grown (Bloc South Jordan),

The Utah Department of Agriculture, Medical Cannabis Program is providing the final approval for the following change request submitted on 09/08/2025..

Submitting updated Security SOP (added line 1 and 10 under instructions)

This is the final approval.

Sincerely,

Aimee Isom
Program Manager I, Medical Cannabis

4315 South 2700 West - TSOB South Bldg, Floor 2 Taylorsville, Utah 84129-2128 • PO Box 146500, Salt Lake City, UT 84114-6500
Telephone 801-982-2200 • http://ag.utah.gov

State of Utah

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DEIDRE M. HENDERSON
Lieutenant Governor

Department of Agriculture and Food

KELLY PEHRSON
Commissioner

AMBER BROWN
Deputy Commissioner

DR. BRANDON FORSYTH
State Chemist
Director, Specialized Products Division

DEPARTMENT OF AGRICULTURE AND FOOD
Specialized Products Division
Operation Change Request Response

12/1/2025,

Dear Justice Grown Utah (Bloc South Jordan),

The Utah Department of Agriculture, Medical Cannabis Program is providing the final approval for the following change request submitted on 11/12/2025.

One of the minority owners of JG Utah LLC (being Tony Hirsch) has elected to sell his interest in JG Utah LLC to two of the majority owners (being Jon Loevy and Michael Kanovitz). Mr. Loevy and Mr. Kanovitz will each purchase an equal share of the ownership interests of Mr. Hirsch. Mr. Hirsch owns 1% of the South Jordan pharmacy.

This is the final approval.

Sincerely,

Cody James
Deputy Director, Specialized Products Division

4315 South 2700 West - TSOB South Bldg, Floor 2 Taylorsville, Utah 84129-2128 • PO Box 146500, Salt Lake City, UT 84114-6500
Telephone 801-982-2200 • http://ag.utah.gov

State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

Department of Agriculture and Food

KELLY PEHRSON
Commissioner

AMBER BROWN
Deputy Commissioner

DR. BRANDON FORSYTH
State Chemist
Director, Specialized Products Division

DEPARTMENT OF AGRICULTURE AND FOOD
Specialized Products Division
Operation Change Request Response

1/26/2026

Dear Justice Grown (Bloc South Jordan),

The Utah Department of Agriculture and Food, Medical Cannabis Program is providing a conditional approval for the following change request submitted on 1/26/2026.

We would like to replace the current BLOC sign on the exterior of the building with a new one that says "Bloc Medical Cannabis Pharmacy." Mock-up attached. Estimated timeline:

BLOC South Jordan - Sign Upgrades - Estimated Timeline

TASK	START DATE	END DATE	DURATION
Obtain Proposals	1/23/2026	1/27/2026	4
Sign Co Shop Drawings / Proofs	1/27/2026	2/1/2026	5
Permitting	2/1/2026	2/16/2026	14
Fabrication	2/16/2026	3/2/2026	14
Installation	3/2/2026	3/3/2026	1

This is the conditional approval. Prior to final approval, an inspection will be conducted.

Sincerely,

VT

Nessa Tall
Medical Cannabis Program Specialist

State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

Department of Agriculture and Food

KELLY PEHRSON
Commissioner

AMBER BROWN
Deputy Commissioner

DR. BRANDON FORSYTH
State Chemist
Director, Specialized Products Division

DEPARTMENT OF AGRICULTURE AND FOOD
Specialized Products Division
Operation Change Request Response

01/27/2026,

Dear Justice Grown (Bloc South Jordan),

The Utah Department of Agriculture, Medical Cannabis Program is providing the final approval for the following change request submitted on 12/09/2025.

Submitting updated Waste Management SOP for approval. Lines 7 & 8 have been added to the SOP.

This is the final approval.

Sincerely,

VT

Nessa Tall
Medical Cannabis Program Specialist

State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

Department of Agriculture and Food

KELLY PEHRSON
Commissioner

AMBER BROWN
Deputy Commissioner

DR. BRANDON FORSYTH
State Chemist
Director, Specialized Products Division

DEPARTMENT OF AGRICULTURE AND FOOD
Specialized Products Division
Operation Change Request Response

02/12/2026,

Dear Justice Grown (Bloc South Jordan),

The Utah Department of Agriculture, Medical Cannabis Program is providing the final approval for the following change request submitted on 02/06/2026.

Updated Inventory Control SOP to address a Letter of concern violation.

This is the final approval.

Sincerely,

VT

Nessa Tall
Medical Cannabis Program Specialist II

GRAMA Claim of Business Confidentiality

Pursuant to Utah Code Section 63G-2-305(1) and (2), and in accordance with Section 63G-2-309, _____ (company name) asserts a claim of business confidentiality to protect the following information submitted as part of a Request for Proposals.

- ☐ non-public financial statements
- ☒ specific employee name and contact information
- ☐ specific customer information, client lists, or subscription lists
- ☒ other (specify):

Business Floorplan/Blueprints

This claim is asserted because this information requires protection as it includes:

☒ trade secrets as defined in Utah Code Section 13-24-2 ("Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, or process, that: (a) derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and (b) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.)

☒ commercial information or non-individual financial information obtained from a person if: (a) disclosure of the information could reasonably be expected to result in unfair competitive injury to the person submitting the information or would impair the ability of the governmental entity to obtain necessary information in the future; [and] (b) the person submitting the information has a greater interest in prohibiting access than the public in obtaining access.

Following is a concise statement of reasons supporting the claim of business confidentiality:

To Ensure the safety of the employees and property of JG Utah

Signed: Eric Ackley

On behalf of (company): BLOC Pharmacy Saint George

Date: 03/31/2026

Utah Department of Agriculture and Food

4315 S 2700 W
Taylorsville,
UT 84129

cannabis@utah.gov
801-982-2375

Medical Cannabis Pharmacy Operating Plan Coversheet

In accordance with 26B-4-2, 4-41a and R66 a licensed Utah medical cannabis pharmacy must have an operating plan that describes how the pharmacy will comply with all applicable operating standards, statutes and administrative rules. **This document is not intended to be a full comprehensive list of all operating standards, statutes and administrative rules; it displays the minimum operating requirements for a facility.** Medical cannabis facilities must be familiar with and comply with all operating standards, statutes and administrative rules. Statues and administrative rules change frequently, verify you are using the most up to date form.

"Medical cannabis pharmacy" means a person that: acquires or intends to acquire medical cannabis from a cannabis processing facility or another medical cannabis pharmacy or a medical cannabis device; or possesses medical cannabis or a medical cannabis device; and sells or intends to sell medical cannabis or a medical cannabis device to a medical cannabis cardholder.

"Home delivery medical cannabis pharmacy" means a medical cannabis pharmacy that the department authorizes, as part of the pharmacy's license, to deliver medical cannabis shipments to a delivery address to fulfill electronic orders.

Application type

☑ Renewal ☐ Updated Submission/Change

Acknowledgements

The applicant understands that as an applicant and potential licensee you are REQUIRED to know the current statutory law, administrative rules and Departmental policies and comply in full? ☑ Yes ☐ No

The applicant understands that a license is not transferrable or assignable. ☑ Yes ☐ No

Medical Cannabis Pharmacy Operating Checklist

Please attach operating plan and page specification for required sections in a single PDF. All PDF uploads must be numbered sequentially to match the page numbers cited in this coversheet.

Business Documents & Information	Page(s) #
Business Name & DBA.	5
Physical Address & Mailing Address.	5
Business contact information (phone & e-mail).	5
Primary contact(s) for facility and information (position, phone, e-mail).	5
Active business license from city.	6
Proof of Performance bond/liquid cash account.	7
Land use permit, proximity waiver or other supporting documents for the business location.	7
A description of any investigation or adverse action taken by any licensing jurisdiction, government agency, law enforcement agency, or court in any state for any violation or detrimental conduct in relation to any of the applicant's cannabis-related operations or businesses. **If there is none for this business, please put N/A for the page number.**	N/A
Organization Information	**Page(s) #**

The name and address of an individual who: (A) for a publicly traded company, has a financial or voting interest of 10% or greater in the proposed medical cannabis pharmacy; (B) for a privately held company, a financial or voting interest in the proposed medical cannabis pharmacy; or (C) has the power to direct or cause the management or control of a proposed medical cannabis pharmacy;	9
A description of the credentials and experience of: each officer, director, or owner of the proposed medical cannabis pharmacy; and any highly skilled or experienced prospective employee.	10-13
Advertising standards (signage, website, etc.) and description of how business will comply with requirements.	14-15
Educational events & handout material.	16-22
Targeted marketing practice and description of how buiness with comply with requirements.	14
Services offered by Pharmacy & cooresponding SOPs. (in store, walk up, drive thru, express pick up, delivery).	5
Records that will be stored by the Pharmacy and plan to maintain for at least 5 years.	57(c), 72(4.Note)
Training standards for staff and responsibilities/duties that will be performed based on position type.	23-54
Prodecure to ensure staff displays identification badge issued by the Department when on the facility premesis or while engaged in the transport of cannabis.	56
Describe how the Pharmacy will maintain a list of active employees that have an Agent card and how they will provide that list to the Department upon request.	57
Building & Security	**Page(s) #**
Business operating hours and hours open to public.	8
Description of the physical characteristics of the proposed facility, including a floor plan that shows access areas, room descriptions, and an architectural elevation.	59-60
Detail the video surveillance system and coverage.	61-63
Detailed security plan.	61-63
Procedure to prevent medical cannabis from being consumed at pharmacy.	64
Visitor policy and procedure.	72
Procedure to report actual or suspected criminal activity.	74-78
Inventory & Sales	**Page(s) #**
Transportation Procedure (between pharmacies, recalls/disposition back to processor, etc.).	84-85
Detail how the facility will handle: recalls, returns (pateint & processor/cultivation), waste, destruction and disposal.	79-83
Procedure to ensure correct labeling on produict received by the Pharmacy, displayed in online store (if applicable), and being dispensed to a pateint.	86
Detail storage protocols for all product.	88-89
Description of the inventory control system and the interaction with the State electronic verification system.	90
Detail inventory control procedures and procedure to mainatin accurate inventory and reporting of any discrepencies.	90
Procedure to keep sales within the state or RMP dosage limit, standards for partial filling.	68-69
Procedure to prohibit sale of expired, misbranded, adulterated, opened product.	91
Plan to meet requirements related to the patient information insert. What options are planned to be provided for the patients?	86-87
Procedure to verify pateint ID and active medical cannabis card. List procedure for all pick up types available at Pharmacy (in store, pick up, drive through, delivery).	41-43

Procedure to protect confidential cardholder data from the EVS and ensure only authorized individuals have access.	44
Home Delivery (If Applicable)	**Page(s) #**
If the Medical Cannabis Pharmacy is categorized as Home Delivery, please complete this section. If the Pharmacy utilizes a courier service, move on to "Delivery Procedures" section and note "N/A" on coversheet. If Pharmacy does not participate in home delivery to patients in any capacity, disregard both sections and note "N/A"	N/A
Description of vehicles used and how security and storage procedures will be maintained during transport and at facility.	N/A
Only deliver during 6am-10pm.	N/A
Procedure to ensure medical cannabis is not left unattended in vehicle for more than one hour.	N/A
Procedure to ensure the transport medical cannabis in a fully enclosed box, container, or cage, that is secured inside a delivery vehicle, and is held at an appropriate storage temperature throughout the delivery process to maintain the integrity of the product.	N/A
Procedure to provide the department with information regarding any vehicle used for the delivery service, including the vehicle's make, model, color, vehicle identification number, and license plate number.	N/A
Security plan that is specific for delivery that includes: a communication plan for couriers and dispatch/security team while enroute and clear procedures for handling of theft, security breaches or accidents.	N/A
Procedure to ensure that no person other than a pharmacy agent or courier agent is in a delivery vehicle during delivery or during the time medical cannabis is in the vehicle.	N/A
Delivery Procedures	**Page(s) #**
Procedure to ensure courier agent wears identification that clearly identifies them to a card holder.	N/A
Procedure for creating/mainiting manifest and ensuring no products are transported that do not appear on the manifest.	N/A
Procedure for missing items/loss of product.	N/A
Record keeping in ICS that ensures accountability for all products.	N/A
Detail the system used to provide real time tracking.	N/A
Policies for verifying the identity and validity of the individual receiving the medical cannabis to ensure the product is delivered to the correct medical cannabis cardholder or caregiver facility employee.	N/A
Procedure to notify the home delivery medical cannabis pharmacy's supervising PMP within 24 hours of when the medical cannabis pharmacy agent first became aware of the missing product.	N/A
Procedure to notify local law enforcement and the Department on any missing product.	N/A
Procedure to log any missing products into the inventory control system.	N/A
Procedure to return any undelivered product to the pharmacy.	N/A
Procedure to ensure changes are not made to orders.	N/A
Procedure to ensure cannabis is not consumed during delivery.	N/A
Procedure to verify payment has been made upon delivery.	N/A
Procedure to provide PMP contact info and hours of availability.	N/A
Change Requests (Renewal Only)	**Page(s) #**
Attach all approved change requets from past year of license.	92-115

Certification and Acknowledgements

Applicant understands the requirements for licensure are based on current statute and rule and are subject to change. Applicant agrees as a condition of licensing that he has read and will abide by the provisions of Utah Code 4-41a and all rules promulgated thereunder and all directives of the Utah Department of Agriculture and Food. The applicant also understands that failure to adhere to or maintain the qualifications of their license, may result in suspension or revocation of the license and/or forfeiture of the performance bond or any other remedies allowed by law.

Applicant agrees to immediately notify the department of any change in ownership or financial interest of the facility; the facility's name, change in location, remodeling, expansion, reduction or physical, non-cosmetic alteration of the facility, change in written operating procedures, or change in any information submitted in this application.

The undersigned acknowledges that representatives of the Utah Department of Agriculture and Food may inspect the records and facility of a cannabis production establishment at any time during business hours to determine and ensure the cannabis production establishment is in compliance with the law. Failure to provide the department or the department's authorized agents immediate access to records and facilities during business hours in accordance with this section may result in a civil monetary penalty; license or registration suspension or revocation; or an immediate cessation of operations under a cease and desist order issued by the department.

Applicant acknowledges and understands that cultivating, possessing, using, distributing and/or selling marijuana is prohibited by federal law, notwithstanding Utah law or any authorizations in the Agent or this Registration to the contrary. Nothing in this application is intended to provide any guidance or assistance in violating or complying with existing federal laws regulating marijuana cultivation, distribution, or use. Similarly, compliance with state law or the terms of this registration, or possession of the registration card does not confer immunity from enforcement of federal law or federal enforcement practices. Further, nothing in this application or the registration card shall be construed as advice with regard to compliance with applicable federal, state, or local tax laws or any regulatory consequences of engaging in any business in this industry.

The undersigned acknowledges that they have read and understand the statements herein and the execution thereof is done voluntarily and by the authorization of the applicant entity.

The undersigned hereby makes application to the Utah Department of Agriculture and Food and certifies that the information contained herein and attached here is true and correct.

Name:	[redacted]	
Signature:		**Date:** 03/10/2026

For UDAF Office Use Only	
Date Received:	Date Approved:
Compliance Officer:	

JG Utah LLC DBA BLOC Pharmacy

1624 S Convention Center Dr
Saint George, UT 84790

(435) 216-3400

[redacted]

BLOC Pharmacy offers purchasing through:

Walk-in
Curbside
Drive-Through

NOTICE:
THIS LICENSE MUST BE POSTED
IN A CONSPICUOUS PLACE

CITY OF ST. GEORGE
175 E 200 N
ST. GEORGE, UT 84770

St.George
THE BRIGHTER SIDE

LICENSE NO.: BL-00049080
DATE ISSUED: 06/09/2025

BUSINESS LICENSE

EXPIRES: **06/03/2026**

THIS CERTIFIES that the business or individual listed below is hereby granted a license to do business as stated at the specified business location for the dates indicated on this certificate.

BUSINESS OWNER: JG UTAH LLC
BUSINESS LOCATION: 1624 S CONVENTION CENTER
TYPE OF BUSINESS: MEDICAL CANNABIS PHARMACY

NAME: BLOC PHARMACY

Melanie Hepcho

CITY LICENSE OFFICER

THIS LICENSE IS NOT TRANSFERABLE BETWEEN OWNERS AND/OR LOCATIONS

VERIFICATION CERTIFICATE FOR INDEFINITE TERM SURETY BOND

THIS IS TO CERTIFY that Bond No. 612206232 **issued by** United States Fire Insurance Company **dated this** 31st **day of** May, 2024 **,**

in the amount of Dollars ($100,000.00 **), on behalf of** JG Utah, LLC
1624 S. Convention Center Dr.
St. George, UT 84790 **(as Principal), and in favor** State of Utah, Department of Agriculture and Food **(as Obligee) , covers a term which began on the** 31st **day of** May, 2024 **, and ends only with the cancellation of said bond or other legal termination thereof; and that the said bond remains in effect, subject to all its agreements, conditions and limitations.**

Signed, sealed and dated March 3, 2026

United States Fire Insurance Company

BY: John P. Harney, Attorney-in-Fact

Current Term of Bond: May 31, 2026 to May 31, 2027

City/State Requirements:

Hours of Operations:

State requires a weekly minimum of thirty-six open business hours. Bloc pharmacy will be open for business ninety-five hours each week, and will be operating an hour before and after business hours.

	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Opening	9:00AM	9:00AM	9:00AM	9:00AM	9:00AM	9:00AM	9:00AM
Closing	7:00PM	9:00PM	9:00PM	9:00PM	9:00PM	9:00PM	9:00PM

State Location Requirements:

The pharmacy is not located within 200 feet of a community location or within 600 feet of a primarily residential district. The district is primarily a commercial zone. However, it is within 1.9 miles to 10 miles of numerous local communities/patients.

License may NOT be sold or transferred:

JG Utah LLC acknowledges that the medical cannabis pharmacy license is not transferrable or assignable.

1. medical cannabis pharmacy shall report in writing to the Department of Agriculture no later 10 business days before the date of any change of ownership of the medical cannabis pharmacy.
2. A Pharmacy Operation Change Request Form will be submitted to the Department of Agriculture to notify the department of any changes.

Advertising and Targeted Marketing

PURPOSE: To ensure JG Utah is abiding by all state rules and regulations regarding signage, website, targeted marketing and educational events and materials.

SCOPE: All JG Utah, LLC ("JG Utah") employees.

INSTRUCTIONS:

1. JG Utah will only use signage on the outside of the medical cannabis pharmacy that includes:
    - the medical cannabis pharmacy's name, logo, and hours of operation;
    - complies with local ordinances regulating signage
2. Except as provided in this section, JG Utah will not advertise in any medium regarding a medical cannabis pharmacy or the dispensing of medical cannabis within the state. JG Utah may:
    - advertise an employment opportunity at the medical cannabis pharmacy
3. JG Utah may advertise:
    - the pharmacy's name and logo
    - the location and hours of operation of the medical cannabis pharmacy
    - a service available at the medical cannabis pharmacy
    - personnel affiliated with the medical cannabis pharmacy
    - whether the medical cannabis pharmacy is licensed as a home delivery medical cannabis pharmacy
    - best practices that the medical cannabis pharmacy upholds
    - educational material related to the medical use of cannabis, as defined by the department
4. JG Utah may maintain on the medical cannabis pharmacy's website non-promotional information regarding the medical cannabis pharmacy's inventory.
5. JG Utah may engage in targeted marketing, as determined by the department, for advertising a particular medical cannabis product, medical cannabis device, or medical cannabis brand via email which is obtained when patient registers with the pharmacy and in store.
6. JG Utah may not provide any gift items or merchandise other than educational materials, as those terms are defined by the department.

- Educational materials may not include any marketing for a specific product from the medical cannabis pharmacy or any other statement, claim, or information that would violate the federal Food, Drug, and Cosmetic Act, 21 U.S.C. Sec. 301, et seq.

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.
- Upper management will maintain a checklist to ensure that each employee has completed the required trainings.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

Pharmacist Consultation Guide

What are you using cannabis for? Also ask about associated uses that are not qualifying conditions like sleep and anxiety. (Medical history, current conditions)

What are your therapy goals? 1st 2nd and 3rd (1st is usually sleep for complicated patients)

What medications are you taking? Look for medications that might be able to be deprescribed. Be aware of meds that require monitoring like Prograf or Coumadin.

What's your experience with cannabis and tell me what products you like and how often you medicate? Regular user? First timer?

Did your QMP give you any restrictions or specific recommendations? Review any QMP limits

Review different routes of administration – onset times and durations

Review the different cannabinoids/terpenes and make recommendations for specific products and how best to consume them

Talk about biphasic dosing and tolerance and ways to minimize tolerance – especially for regular users.

Talk about dependence and addiction – tell pts to use with a healthy activity - not to avoid or check-out

Legal – no smoking, driving, public consumption, keep labels on products, etc , may not transport flower after 60 days.

Next steps...the process to shop/website/how to follow-up with the pharmacist

One last review of treatment plan/Fill out Cannabis Consult Recommendation form

Cannabis Consult Recommendation

"Start Low and Go Slow"

Gel Cube: _____(_____mg_) with small amount of fatty food AM / Afternoon / PM
Increase dose by _____ (_____) cube until optimal effect is obtained (after 2- 3 doses of previous strength).
Onset: 1-2 hours
Allow 2-3 hours for full effect.
Effect lasts 6-8 hours. Do NOT repeat for at least 4-5 hours.

Tincture: _____ Place _____ drops/ml under tongue. Hold for about 2 minutes before swallowing, eating or drinking. Use in the AM / PM / or every about 4 hours.
Increase dose by _____ drops until optimal dose is obtained.
Onset ~30 minutes
Allow 1-2 hours for full effect.
Effect lasts 4-6 hours. Do not repeat for at least 3 hours.

Vape: FLOWER / CARTRIDGES _____
Inhale 1 to 3 puffs. Allow 30 minutes for full effect.
Onset: Immediate (within minutes)
Dose every 1-4 hours as needed.
Effect lasts 2-3 hours.

Topical: _____
Apply to the affected area and massage into the area for a minimum of 2 minutes.
Reapply as needed. Length of effect varies.

Additional Comments:

_____

_____

_____

_____

BLOC
PHARMACY

Questions? Please call us at 435-216-3400
Option 3 Pharmacist
Option 4 Store
BLOCPHARMACY.COM

Cannabis Accidental Ingestion & Toxicity Guide

1. Anyone who accidentally ingests cannabis—especially a **child**—can experience overdose effects such as intoxication, altered perception, anxiety, panic, paranoia, dizziness, weakness, slurred speech, poor coordination, apnea, and heart problems.
2. If there are marijuana products in your home, store them as you would medications. Make sure the products are in out-of-reach or locked locations, in child-resistant packaging or containers. Clearly label marijuana edibles, and store them in their original packaging.
3. If your child eats marijuana by accident, call the free poison control hotline at 1-800-222-1222 as soon as possible for fast help. If symptoms seem severe, call 911 or go to an emergency room right away.
4. The experience can be very unpleasant, but your health is not at risk.
5. Stay calm, find a quiet place, and take deep breaths. Stay in a comfortable and familiar environment.
6. Effects will wear of in minutes to hours depending on the product consumed and method of consumption.
7. May feel groggy and sweat excessively.
8. Try to sleep it off. If unable to sleep or "turn your brain off", fresh air and a walk can help. Never walk alone, and if feeling too dizzy or disoriented, a walk may not be an option.
9. Try taking CBD. It can counteract the effects of THC. Be careful the product does not contain any additional THC.
10. Try chewing on a few peppercorns. Black peppercorns actually help if you are having symptoms of anxiety and paranoia.
11. A warm or cool bath/shower helps some individuals.

BLOC CANNABINOIDS

Phytocannabinoids found in cannabis plants mimic our bodies natural endocannabinoids. They work on a variety of different receptors in our body (CB1, CB2, 5HT, TRPs, PPARs and GPRs). When these cannabinoids are used together along with the terpenes and flavonoids we find In the whole cannabis plant they are more effective and we call this synergy the entourage effect.

THC

BP = 315 F

- Pain Reliever
- Sedative
- Anti-Anxiety
- Anti Seizure
- Anti-Tumor
- Anti-Nausea
- Reduces Muscle Spasms
- Appetite Stimulant
- Anti-Inflammatory
- Neuroprotective

CBD

BP = 356 F

- Anti-Convulsant
- Neuroprotective
- Anti-Inflammatory
- Pain Reliever
- Anti-Anxiety
- Anti-Tumor
- Promotes Bone Growth
- Blood Sugar Control
- Reduces Muscle Spasms
- Relieves Psoriasis
- Immune System Support

CBN

BP = 365 F

- Sedative
- Pain Reliever
- Appetite Stimulant
- Reduces Muscle Spasms
- Promotes Bone Growth

THCV

BP = 428 F

- Appetite Suppressant
- Blood Sugar Control
- Anti-Anxiety
- Stimulates Bone Growth
- Anti-Convulsant

CBG

BP = 320 F

- Anti-Bacterial
- Anti-Fungal
- Sedative
- Blood Sugar Control
- Anti-Tumor
- Neuroprotective
- Mood Stabilizer
- Anti-Inflammatory
- Reduces Muscle Spasms
- Promotes Bone Growth
- Blood Pressure Control

CBC

BP = 428 F

- Anti-Inflammatory
- Anti-Tumor
- Pain Reliever
- Anti-Convulsant
- Sedative
- Anti-Microbial
- Promotes Bone Growth

THCA

BP = 248 F

- Anti-Nausea
- Anti-Convulsant
- Anti-Tumor
- Reduces Muscle Spasms
- Anti-Inflammatory
- Neuroprotective

CBDA

BP = 266 F

- Anti-Tumor
- Anti-Nausea
- Anti-Inflammatory

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BLOC

TERPENES

What they are & how do they help?

	EFFECTS	ALSO FOUND IN	MEDICAL BENEFITS
LIMONENE	Elevated mood, stress relief	Citrus rinds, juniper, peppermint	Anti-depression, Anti-Anxiety, Gastric reflux, Antifungal
MYRCENE	Relaxing enhancing THC's psychoactivity	Mango, thyme, citrus, lemongrasss, bay leaf	Antiseptic, Anti-bacterial, Antifungal, Anti-inflammation
HUMELENE	Suppresses appetite	Hops, coriander	Anti-inflammation, Anti-bacterial, Pain relief
LINALOOL	Sedating, calming	Lavander, laurel, birch, rosewood	Insomnia, Stress, Depression, Anxiety Pain, Convulsions
CARYOPHYLLENE	None	Pepper cloves, hops basil, oregano	Antioxidant, Insomnia, Inflammation, Pain Muscle spasms
PINENE	Memory retention alertness	Pine needles, conifer, sage	Inflammation, Asthma (Bronchodilator)
BORNEOL	Muscle and joint pain relief	Camphor, rosemary, wood	Antimicrobial, Anti-inflammation
OCIMENE	Improved health in diabetics	Mint, parsley, basil, mangoes	Anti-inflammation, Insect repellant
NEROLIDOL	Sedating, calming	Tea tree, jasmine ginger, orange	Anti-fungal, Sedative, Antimicrobial
TERPINOLENE	Sedating	Nutmeg, apple cumin, tea tree	Antioxidant, Sedative, Anti-fungal Anti-bacterial
EUCALYPTOL	Memory retention, respiratory benetits	Eucalyptus, pine, conifer, sage	Anti-bacterial, Antioxidant, Anti-inflammation

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TERPENE NAME	FOUND IN	AROMA	EFFECTS
α-BISABOLOL	Chamomile (up to 50% bisabolol), Sage, Candeia Tree	Floral Mellow Sweet	Soothes irritated skin, Antioxidant, Pain relief, Enhances topical absorption of other compounds
CITRAL	Citrus fruits, Lemongrass and other lemon-scented herbs	Citrus Fresh Sweet	May lower blood glucose, Weight loss aid, Fights GI inflammation, Antimicrobial, Anti-inflammatory
LIMONENE	High amounts in citrus fruit peels, especially oranges	Citrus Fresh Warm	Enhances intestinal absorption of other compounds, Anti-nausea, Mood elevant, Anxiolytic
EUGENOL	Clove, Cinnamon, Nutmeg, Bay Leaves, Turmeric, Ginger	Warm Spicy Earthy	Local anesthetic for toothaches, Antifungal, Blood thinner, Antispasmodic for cramps/nausea
MYRCENE	Mango, Hops, Lemongrass, Basil, Cardamom, Verbena, Thyme	Earthy Pungent Herbal	Sedative, Anti-seizure, Muscle relaxant, Pain relief, Antibiotic, Anti-inflammatory
TERPINEOL	Lilacs, Lime Blossoms, Pine, Bitter Orange Oil, Eucalyptus Sap	Floral Mellow Pine	Sedative, Anti-inflammatory Antibacterial Antiparasitic, Fights cavity-causing bacteria
LINALOOL	Found in 200+ plants, including Lavender, Citrus, Birch, and Rose	Floral Sweet Citrus	Sedative, Neuroprotective, Anti-seizure, Antimicrobial Tumor suppression, Mood elevant
ß-CARYOPHYLLENE	Black Pepper, Cinnamon, Hops, Cloves, Rosemary, Thyme	Spicy Pungent Herbal	Muscle relaxant, Mood elevant Pain relief, Gastroprotective Tumor Suppression, Anxiolytic
TERPINOLENE	Cumin, Nutmeg, Trees such as Apple, Fir, Lilac, Tea Tree, Pine	Fresh Citrus Pine	Sedative, Anxiolytic Cardioprotective, Antioxidant Tumor suppression Antimicrobial
HUMULENE	Hops, Sage, Ginseng, Basil, Cloves, Black Pepper	Earthy Spicy Woodsy	Appetite suppressant, Pain relief, Gastroprotective, Reduces allergic airway inflammation
PINENE	Pine, Spruce, Chamomile, Saffron, Parsley, Rosemary, Sage	Fresh Earthy Pine	Bronchodilator, Enhances memory Anti-inflammatory, Pain relief Gastroprotective, Anti-nausea

BOOJUM

For a complete list of terpene citations, see link to digital booklet on reverse side of this postcard.

DOSING

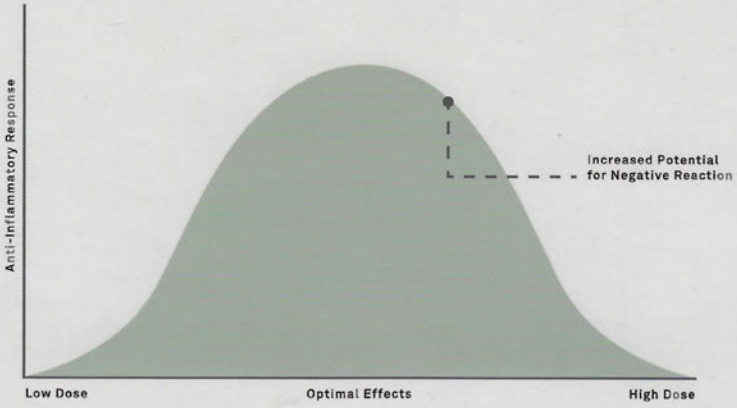
Finding your ideal dose depends on the delivery method you use as well as other factors such as your individual tolerance, body weight and metabolism. An ideal dose can be found through experience, but you can use simple calculations to find a target range. Once you have gained more experience you will be able to gauge your ideal dose more appropriately.

FIND YOUR IDEAL DOSE

Start low and go slow. Every body is different. The best way to find your ideal dose is to experiement and keep notes.

BIPHASIC = TWO PHASES

Cannabis compounds have biphasic properties. As the dose increases, the effects do not necessarily improve. Conversely, higher doses can produce opposite effects. Less is more.



THE ENDOCANNABINOID SYSTEM

Or 'ECS' for short

This system is central to many core functions in our body and can uniquely receive the CBN, THC & CBD molecules found in cannabis. The ECS is comprised of many different signaling molecules, receptors, and enzymes that impact our physiological processes.

The two most studied are the CB1 & CB2 receptors. These control pain modulation, appetite, memory, anti-inflammatory response, and other immune system responses. ECS receptors are found on cell surfaces and although they are present in everyone, each body is different, which is why a wide range of reactions to these cannabinoids occur.

CB1

Received THC molecules

These receptors are concentrated in the brain, central nervous system and scattered throughout other bodily tissue.

CB2

Received CBN molecules

Found in peripheral organs and cells associated with the immune system throughout the body. The highest concentration of these receptors is in the gut.

Others

Scientists have discovered many other ECS receptor & signaling mechanisms. Research is underway to better understand these complex systems.

POINT OF SALE PROCEDURES (MJ FREEWAY)

PURPOSE: To ensure that all employees are completing sales in a consistent and timely manner, while following Department of Agriculture regulations.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") employees working in our medical cannabis pharmacy facility who will be completing sales.

INSTRUCTIONS:

1. Navigate to MJ Freeway by opening Google Chrome and going to mjplatform.com.
2. Log in with assigned Username and Password.
3. Set 'Register', by navigating to the person icon in the upper right corner. Select the icon and then 'Select' the register that sales will be completed on.
4. Select 'Queue' from the welcome screen or by navigating to the tool drawer/waffle in the upper left. The queue will allow the employee to see all the patients in the pharmacy that need to be seen.
5. Select the appropriate patient from the queue and select 'Product Menu' to begin building the patients sale.
6. Scan Sku to identify the product if possible. If a scan is not possible, contact a supervisor or the inventory manager.
7. Pharmacy may only sell the approved state product types from licensed state vendors. Pharmacy will NOT sell any type of smokable product.
8. Enter the amount of product the patient is purchasing. NOTE: concentrates and flower get fulfilled in weight and every other product will be filled in quantity.
9. When the product(s) the patient is purchasing are listed, select 'Fulfill'.
10. The products now need to be taken out of inventory. Complete the drop downs under each product on the 'Fulfill' page.
11. Once the product is taken out of inventory, select 'Update Cart'
12. If the patient is eligible for a discount select 'Fetch Coupons', and select the applicable discount from the drop down. Once selected, select 'Apply Coupon'.
13. After the patient's discount is applied, or if they aren't eligible for a discount "Select Payment/Printing".
14. Patient has three payment options: Debit, Pay by Bank and Cash.
15. If the patient is paying with Cash, then in the row for 'Cash' enter the total amount of cash received from the patient. Select 'Complete Payment'
16. If patient is using Pay by Bank, agent will select Dutchie Pay tab.
17. Patient then scans their Pay by Bank QR code on their phone to complete the payment.

18. If the patient is paying with a Debit Card using the Skylight debit terminal, then the agent will select the debit card/other payment tab.
19. Agent will enter the exact total amount of the purchase in the row for ‘Debit.’ Select ‘Complete Payment’.
20. Skylight Debit Reader allows the patient one option of payment: debit card use.
21. Patient’s Debit Card is never handled by the PCA, only the patient. Patient will manage the use of their phone.
22. PCA will retain Debit receipts that prints for Bloc’s record keeping purposes.
23. Before patient leaves, make sure they receive labels and a receipt from the Dutchie sales system.

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

MJ Freeway System Down Protocol

Purpose: Procedure for all JG Utah employees to follow when the MJ Freeway system or the internet is down, so that customers will not go without their needed medications.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") employees working in our medical cannabis pharmacy facility who will be completing sales.

Instructions:

1. If MJ Freeway is down, the Pharmacy Agent will verify customers medical cannabis patient card and government issued photo ID.
2. PMP will check EVS to view customers recommendation and recent purchasing history.
3. In the event that EVS is also down or JG UT pharmacy's internet is down, then the PMP will advise the Pharmacy Agents to notify customers that the system is down and purchases will be limited based on the PMP's discretion. Customers will not be able to purchase a full 30 day supply.
4. Sales information in electronic verification system (EVS)
    a. Check the notes tab in the EVS to determine if the patient purchased a product that was not recorded in the inventory control system during the outage.
    b. Check the patient's purchase history in the EVS and calculate the total amount of medical cannabis product that the patient purchased in the past 28 days, including any product noted in the EVS notes tab during the present inventory control system outage.
    c. Refuse the sale of the product to the patient if the sale will result in the patient receiving more product than the legal dosage limit as defined in Utah Code Ann. 26-61a-102.
    d. Product may be sold to the patient as long as it can be verified in the EVS that the sale would not result in the patient receiving more product than the legal dosage limit.
    e. Enter the following information in the EVS notes tab associated with the patient making the purchase immediately after selling any product or device:
        i. Select note type "ICS Outage Sale."
        ii. For "Note name" enter the pharmacy name and location.
        iii. For "Correspondence date" enter the date of sale. ● In the "Comment field" enter:
        iv. The time of each purchase.
        v. The quantity and type of product or device purchased. This should include sufficient information regarding a product's weight and THC level so the legal dosage limit may be calculated by another medical cannabis pharmacy.
        vi. An identification code unique to the medical cannabis pharmacy agent or pharmacy medical provider making the notation.
        vii. Mark "no" to the private note question.
5. All information that state law requires to be collected about the sale of a product or device must be recorded, even during an inventory control system outage. Information

may be recorded on paper or electronic records as outlined in the pharmacy's standard operating procedure.

6. With the approval/permission from the state, if MJ Freeway is down, Bloc may complete the transaction in LeafLogix; however, the transaction MUST be completed in MJ Freeway as soon as it is back online.
7. As soon as MJ Freeway or the internet is back up, a pharmacy agent, using the receipts, will complete the sale in the MJ Freeway system.
8. All required information about the products and devices sold during the outage must be entered into the inventory control system within 72 hours after the outage is over.

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

Curbside Delivery Procedure

Instructions: Curbside Purchase**:** If a patient requires drive up service, s/he can call in advance of purchase to arrange with Manager, Guard or Pharmacist.

1) Patient makes online reservation.
    a) Staff receives online reservation and fills reservation as usual, certification checked, and product placed in opaque bag.
    b) Once the order is fulfilled, it is stored behind the POS on the back counter. All online orders that are not picked up by the close of business are put back into inventory and stored in the vault.
    c) Once the reservation/order is filled, patient/caregiver to receive text message via Dutchie (online reservation platform).
2) If the patient is a first time cardholder requiring a pharmacy consult, the PMP on staff will perform an over the phone consult.
3) Staff receives online reservation and fills reservation as usual, certification checked, and product placed in opaque bag.
4) Once the order is fulfilled, it is stored behind the POS on the back counter. All online orders that are not picked up by the close of business are put back into inventory and stored in the vault.
5) Once the reservation/order is filled, patient/caregiver to receive text message via Dutchie (online reservation platform).
6) If the patient is a first time cardholder requiring a pharmacy consult, the PMP on staff will perform an over the phone consult.
7) At the agreed upon time, patient pulls up alongside the pharmacy in a designated parking spot (designated spots are located directly in front of the pharmacy, closest to the entrance). At curbside, Bloc Pharmacy staff will collect the patient/caregiver's Utah Medical Marijuana card, driver's license, and payment in full.
8) The card and payment will be brought to the POS, card scanned to confirm validity first. Once confirmed, sale processed and receipts printed. Receipt, any change due and MMJ card placed into the bag with the product.
9) Bag delivered to the Patient/Caregiver curbside, with at least two agents at all times.

All monetary sales transactions and medication delivery to patients will be within the coverage of surveillance cameras*

Drive-Through Procedure

Instructions: Drive-through Purchase: Procedure for patients purchasing through the drive-through.

1. Patient makes online reservation. They must choose Pickup (Drive-thru). Drive-through pick-up will be available during regular business hours. Business hours are Monday through Saturday 9 AM to 9 PM and Sunday 9AM to 7PM.

2. If the patient is new to Bloc Pharmacy, the agent will notify the pharmacist on duty.

a. The pharmacist will check the patient's recommendation and complete the patients profile if the patient has already completed a pharmacy consult.

b. If the patient is a first time cardholder requiring a pharmacy consult, the PMP on duty will call the patient and perform an over the phone consult or they will schedule a consult and cancel the order if it cannot be completed that day.

3. Staff receives online reservation and fills reservation as usual and product(s) placed in an opaque bag.

4. Once the order is fulfilled, it is stored behind the POS in the drive-thru order drawers.

5. Once the reservation/order is filled, patient/caregiver will receive a text message via Dutchie (online reservation platform).

6. When the order is ready the patient will pull through the drive-thru. The pharmacy agent will collect the patient's/caregiver's Utah Medical Marijuana card, state approved photo identification, and payment in full.

7. Patient may pay via Pay by Bank, debit card or a cash payment

8. Agent will verify the order with the patient then process the sale and print labels and receipts.

9. Receipt, any change due, MMJ card, state approved photo identification and products purchased contained in an opaque bag will be given to the patient.

10. Patients may pick up only the products ordered online. They may not add to the order. They may choose to not purchase product(s) in the order.

11. All online orders that are not picked up by the close of business are put back into inventory and stored in the vault.

MONITORING:

· Pharmacist-in-Charge (PIC), GM, AGM, and Supervisors will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.

2. Instruct employee on corrective action.

INVENTORY REPORTS

PURPOSE: In order to be in compliance with Department of Agriculture regulations, a physical copy of the completed inventory must be kept on hand at all times. A limited access employee will have access to the binder in the safe where inventory sheets are stored. All employees involved in the inventory count must sign the report.

SCOPE: All JG Utah, LLC ("JG Utah") employees who are completing inventory counts.

INSTRUCTIONS:

SET UP COUNT SHEET/DISCREPANCY REPORT

1. From the MJ Freeway System software, go to "Analytics"
2. Select the Facility in the top right drop down.
3. Select "Inventory Transactions" and choose the previous months dates.
4. Select "Sales by Product" and "Sales by Order" and run for the previous month.
5. Complete Monthly Summary Report calculations.
6. Run the current inventory report for the day the reports are down (1st of every month at 5am).
7. Reconcile Item Quantity with the Quantity on Hand.
8. Investigation and reconciliation of any discrepancies must be completed within 24 hours.
9. The state will be notified of any major discrepancies that cannot be reconciled.
10. Monthly report will be uploaded to Monthly Inventory Report in OneDrive.
11. Submit all reports, Current Inventory, Monthly Summary and physical Count Sheets to the state. (cannabispharmacyinventory@utah.gov)

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTIONS:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

GENERAL TRAINING REQUIREMENTS

PURPOSE: All employees must complete Utah Department of Agriculture requirements as well as JG Utah, LLC (JG Utah) training requirements to maintain employment.

SCOPE: All JG Utah employees.

INSTRUCTIONS:

All Employees

- Apply for registration with the Utah Department of Ag to act as a Pharmacy Agent;
    - Complete the application;
    - Complete the state required Agent Certification course.
    - Pay the application fee (to be covered or reimbursed by JG Utah);
    - The application and the receipt must be submitted to the General Manager and will be filed in our secure administrative office and scanned into our secure, encrypted server.
    - The signed certificate must be uploaded to the UDAF application site for approval
- Must pass a criminal background check/fingerprint analysis, at both the State and Federal level.
    - Each prospective cannabis pharmacy agent must:
        - Submit a fingerprint card in a form acceptable to the Utah Department of Public Safety; and
        - The pharmacy agent will need to upload a signed copy of their UCAT certificate.
- All agents are required to complete the online training for the seed-to-sale software MJ Freeway at: https://budtender.training/tracks/a6ba5bd2-875b-11eb-8dcd-0242ac130003/classes/mj_platform
- All agents will receive security and emergency procedure training, following all outlined SOPs and the instruction of the Security Director and our security contractor. Training will be held annually for all employees.
- All employees will be trained in the following:
    - Patient Care
    - Regulatory Compliance
    - Site Cleaning
    - POS Transactions
    - Cash Management

- General Operations

Pharmacist

- Any licensed pharmacist employed by JG Utah must complete a 4-hr training course, required by the Department of Agriculture at: https://medicalcannabis.utah.gov/providers/continuing-education/
- Pharmacists will be required to maintain their UT Board of Pharmacy License in good standing, completing any continuing education that may be necessary to do so.
- Copies of current licensing must be provided to JG Utah and will be maintained on-site in physical and digital form.

Security Guards

- Security Officers must obtain any and all training and licenses required to maintain best practices in the performance of their duties as Security Guards. (See JG Utah Security Guard Policy)

Additional Training

- JG Utah pharmacists are charged with acquiring up to date information on products, strains, symptom alleviation, and devices based on the most current information available.
- Staff is encouraged to attend outside educational seminars (e.g. Hemp Staff training) though this is not required for employment.

MONITORING:

- Upper Management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

Customer Consultation – Pharmacist In Charge Duties

PURPOSE: All Pharmacists in Charge must comply with Utah Department of Agriculture requirements as well as JG Utah, LLC (JG Utah) training requirements to maintain employment.

SCOPE: All JG Utah PICs.

INSTRUCTIONS:

Pharmacist in Charge:

1. A medical cannabis pharmacy's pharmacist-in-charge (PIC) shall have the responsibility to oversee the medical cannabis pharmacy's operation, and that it is in compliance with Chapter 26, Title 61a, Utah Medical Cannabis Act and Utah Administrative Rules R66-5, Utah Medical Cannabis Act Rules. The PIC shall generally supervise the medical cannabis pharmacy, though the PIC is not required to be on site during all business hours.
2. A unique email address shall be established by the PIC, or responsible party, for the medical cannabis pharmacy; to be used for self-audits or medical cannabis pharmacy alerts, initiated by the Department. The PIC or responsible party shall notify the Department of the medical cannabis pharmacy's email address in the initial application for licensure.
3. The duties of the PIC shall include:
    a. ensure that PMPs, and pharmacy agents, at the medical cannabis pharmacy appropriately interpret and distribute a recommendation, in a suitable container, appropriately labeled for subsequent administration, or use by a patient;
    b. ensure that medical cannabis and a medical cannabis device are distributed safely, and accurately, with correct dosage parameters as recommended;
    c. ensure that medical cannabis, and a medical cannabis device, is distributed with information and instruction as necessary for proper utilization;
    d. ensure that PMPs and pharmacy agents communicate to a cardholder, at their request, information concerning any medical cannabis or medical cannabis device distributed to the cardholder;
    e. ensure that a reasonable effort is made to obtain, protect, record, and maintain patient records;
    f. education and training of medical cannabis pharmacy personnel;
    g. establishment of polices for procurement of medical cannabis, a medical cannabis device, and educational material sold at the facility;
    h. distribution and disposal of medical cannabis and a medical cannabis device, from a medical cannabis pharmacy;
    i. appropriate storage of all medical cannabis and a medical cannabis device;
    j. a record of transactions of the medical cannabis pharmacy necessary to maintain accurate control and accountability for materials required by applicable state laws;

k. establish effective control against theft or diversion of medical cannabis or a medical cannabis device, and record of such product;

l. legal operation of the medical cannabis pharmacy, including inspections, and other requirements, of state laws governing the medical cannabis pharmacies;

m. implementation of an ongoing quality assurance program, that monitors performance of the personnel at the medical cannabis pharmacy;

n. ensure that the point of sale (POS) is in working order;

o. ensure that relevant information is submitted to the state's ICS and EVS in a timely manner;

p. ensure that medical cannabis pharmacy personnel have appropriate licensure and registration;

q. ensure that no medical cannabis pharmacy operates with a ratio of medical cannabis pharmacy medical provider to pharmacy agents that results in, or reasonably would be expected to result in, a reasonable risk of harm to public health, safety, and welfare;

r. ensure that the PIC assigned to the medical cannabis pharmacy is recorded with the Department, and the Department is notified of a PIC change within 30 days of the change; and

s. ensure with regard to the unique email address used for self-audits or medical cannabis pharmacy alerts, that:

i. the medical cannabis pharmacy uses a single email address; and

ii. the medical cannabis pharmacy notifies the Department, on the form prescribed, of any change in the email address within seven calendar days of the change.

4. A PMP cannot be designated as PIC, for more than two medical cannabis pharmacies at one time.

5. The PIC, or designated pharmacist on-site, will review every transaction on site as required by the sate.

6. The pharmacy will always be under the full and actual charge of the PIC, but it shall be under the direct supervision of at least one supervising PMP, who is physically present at all times when a medical cannabis pharmacy is open to the public.

7. The pharmacy PIC is not required to be in the medical cannabis pharmacy at all times, but shall be available for contact within a reasonable period with the supervising PMP.

8. The pharmacy shall never operate with a supervision ratio of PMP to pharmacy agent that results in, or reasonably would be expected to result in, an unreasonable risk of harm to public health, safety, and welfare.

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

PMP Duties and Bloc Customer Consultation Procedures

1. Each new cardholder will schedule a 15-30 minute consultation on-line, over the phone or as a walk-in.
2. Pharmacists (PMPs) will use EVS to verify patient's RMP recommendation.
3. Pharmacists (PMPs) shall review the questions on the Bloc Pharmacist Consultation Guideline that address:
    a. Discuss medical history and qualifying condition
    b. Discuss goals of treatment
    c. Obtain current medication profile
    d. Obtain history of cannabis use
    e. Review QMP limits, restrictions, and recommendations
    f. Review cannabinoids and terpenes
    g. Review dosage forms, onset times, durations, and dosing recommendations
    h. Discuss bi-phasic dosing and tolerance
    i. Discuss dependence and addiction
    j. Discuss legal uses, storage, driving, public consumption, labels, etc.
    k. Discuss accidental ingestion and THC toxicity and safety (see guide)
    l. Discuss recommendation and next steps (follow-ups, ordering, website)
    m. Fill out Cannabis Consult Recommendation card for patient
4. Pharmacy Agents may not counsel patients regarding their medical conditions. Agents will use the Cannabis Consult Recommendation form from the PMP to help advise patients on products.
5. During hours of operation that are seen to have a high volume of orders, two PMPs will be present. One will conduct patient consultations and one will verify patient purchases and check EVS to verify/calculate that the patient is authorized to make a purchase.

Customer Consultation – Pharmacy Agent Duties

PURPOSE: All pharmacy agents must comply with Utah Department of Agriculture requirements as well as JG Utah, LLC (JG Utah) training requirements to maintain employment.

SCOPE: All JG Utah pharmacy agents.

INSTRUCTIONS:

All Pharmacy Agents:

1. A pharmacy agent may perform the following duties:
    a. within the dosage parameters specified by a QMP or PMP, assist the cardholder with understanding available products, proper use of a medical device, medical cannabis strains, and methods of consumption or application;
    b. using the ICS, verify the status of an individual's medical cannabis card, and dosage parameters in a patient recommendation;
    c. enter and retrieve information from the ICS;
    d. authorize entry of a cardholder into the cardholder counseling area;
    e. provide pricing and product information;
    f. accurately process cardholder payment, including issuance of receipt, refund, credit, and cash;
    g. prepare labeling for product;
    h. retrieve medical cannabis, and medical cannabis device, from inventory;
    i. accept new medical cannabis, or medical cannabis device, orders left on voicemail for a PMP to review;
    j. verbally offer to a cardholder, the opportunity for counseling with a PMP regarding medical cannabis, or a medical cannabis device;
    k. assist with dispensing of product to a cardholder;
    l. screen calls for a PMP;
    m. prepare inventory of medical cannabis, and medical cannabis device;
    n. assist with maintaining a safe, clean, and professional environment.
2. A pharmacy agent shall not perform the following duties:
    a. receive dosage parameters for a patient's recommendation over the phone, or in person;
    b. access patient information in the EVS;
    c. view medical treatment, and medication history, in the EVS;

d. determine, or modify, dosage parameters in a patient's recommendation; or

e. provide counseling, or consultation, regarding a patient's medical condition, or medical treatment.

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

Pharmacist Transaction Recommendation Verification

Purpose: Procedure for all JG Utah Pharmacists (PMP's) and Pharmacy Agents to abide by the laws governing cannabis sales in Utah.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") employees working in our medical cannabis pharmacy facility who will be completing sales and customer check-ins.

Instructions:

1. In accordance with 4-41a-1102(3) A medical cannabis pharmacy shall: access the state electronic verification system before dispensing cannabis or a cannabis product to a medical cannabis cardholder in order to determine if the cardholder or, where applicable, the associated patient has met the maximum amount of medical cannabis described in Subsection (2) This check is intended to occur with each purchase.
2. Pharmacy Agent will verify upon checking patient into the pharmacy that patient limits align with QMP recommendations in EVS. Patient limits will be checked with each transaction.
3. PMP will review, make note, and insert an icon photo alert on patients' profiles who have any specific guidelines on their recommendation from their QMP.
4. Pharmacy Agent will notify the PMP when the patient has an icon photo alert.
5. A PMP on duty is responsible for ensuring that each patient purchase abides by the patient's legal allotment.

MONITORING:

- Pharmacist-in-Charge (PIC) will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

LMP PAPERWORK

PURPOSE: To outline procedure for entering LMP paperwork.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") PMPs.

INSTRUCTIONS:

1. After patient drops off paperwork, verify all required information has been filled out.
2. Call the doctor's office to verify the forms.
3. Document all calls/contact with the office and patient on the paperwork.
4. If paperwork is emailed to qmp proxy email address, calling the office to verify is not necessary.
5. Enter the recommendation into EVS.
6. Upload form into EVS.
7. Call patient to notify them that that are in awaiting payment and they need to pay the $15 state fee.
8. If an agent receives the paperwork from a patient while PMP is in a consult, it must be given to the PMP on duty as soon as possible. Agents have been educated on the process.
9. All LMP paperwork should be entered into EVS within 24 hours of verification.

MONITORING:

- PIC will monitor PMPs to ensure adherence to the outlined procedure.

Pharmacist Requesting a Recommendation Change

Purpose: Procedure for all JG Utah Pharmacists (PMP's) and Pharmacy PMPs to abide by the laws governing cannabis sales in Utah.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") PMPs working in our medical cannabis pharmacy facility located in Saint George, UT (Bloc Pharmacy) who will be reviewing patients' recommendations.

Instructions:

1. PMP will review every patient's profile/recommendation in EVS at least every six months and place a note at the bottom of the profile that the review has been completed and the date it was completed.
2. If a patient wishes to receive a type of product that is NOT listed in their EVS profile, the PMP will contact the patient's provider to try to obtain approval for the patient to purchase and use that form of cannabis.
3. The PMP will attempt to email and call the provider.
4. If the provider calls back, we will discuss the patient's request with the provider.
5. If the provider approves of the request/change over the phone only, the PMP will notify the provider that a follow-up email will be sent to the provider, so a written approval response.
6. If the provider responds via email with the approval, then no further communication is required.
7. The PMP will request that the provider update EVS. However, in case the update is not completed by the provider, the PMP will place a note in MJ Freeway, Dutchie, and the Notes section of EVS.
8. If the request is approved, the PMP will notify the patient that they may purchase and use the form they are requesting to use.
9. If the provider denies the request, the PMP will notify the patient that the request was denied.

MONITORING:

- Pharmacist-in-Charge (PIC) will monitor PMPs to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any PMP found not following the procedures in this SOP.
2. Instruct PMP on corrective action.

Patient Check-in

Purpose: Procedure for all JG Utah Pharmacists (PMP's) and Pharmacy Agents to follow to abide by the laws governing cannabis sales in Utah.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") employees working in our medical cannabis pharmacy facility who will be completing sales and customer check-ins.

Instructions:

1. Patients will be greeted at the front desk check-in.
2. PCA will obtain the patient's driver's license, passport or state accepted form of identification and their Utah Medical Cannabis Patient Card.

State accepted forms of identification:

a. any state driver's license or identification card
b. valid federal-issued photo identification:
    i. US passport
    ii. US passport card
    iii. US military identification card
    iv. permanent resident card or alien registration receipt card
c. tribal identification card
d. valid international passport
e. Driver license from any state or country
f. Identification card from any state or country
g. Passport from any country, with or without Appropriate Immigration Document(s)
h. Consulate card from any country
i. Border Crossing card
j. Employment Authorization Documents (I-766 – EAD)
k. Federal Government Personal Identity Verification Card (PIV)
l. Permanent Resident Alien Card (I-551 – Green Card)
m. Military ID
    i. Uniformed Services Identification Card
    ii. Department of Defense Common Access Card
    iii. U.S. Coast Guard Merchant Mariner Card
    iv. Other Military IDs
n. GET Mobile ID (digital ID approved by the state)
    i. Must be verified using the GET Mobile Verify app.
    ii. iPad will be kept at check-in that has the app downloaded onto it

3. PCA will check the patient into the queue (MJ and LL).
4. If the patient is an existing Bloc pharmacy patient, the PCA will ask the patient if they have any questions for the PMP during this visit. The PCA will allow the patient entrance to the sales floor.
5. PCA will notify the PMP using Microsoft chat if the patient has questions.
6. PCA will alert the PMP if the patient has a red thumbs down photo icon. (See SOP for Pharmacist Transaction Verification)
7. PMP will send the amount the patient can purchase to the agents at the register through Microsoft chat.
8. If the patient is a first-time customer, the PCA will alert the PMP via Microsoft Teams chat.
    a. PCA will ask the patient if they had had an initial pharmacy consult at another pharmacy or if they need to meet with the PMP at Bloc.
    b. PCA will create a patient profile adding the patient's phone number, email address, gender and QMP. PCA will copy all information from the patient's MJ profile into LL. MJ profile and LL profile should be identical.
    c. PMP will verify the patient's card, QMP, notes and recommendation in EVS.

d. PMP will perform initial consultation if needed. (See SOP for Patient Consultation Guide and Cannabis Consult Recommendation)
e. PMP will place a note in the Additional Medical Marijuana Patient Information section detailing if counseling was done at Bloc or another pharmacy and the QMP's recommendation excluding all medical condition information.
f. PMP will apply the appropriate photo icon. (See SOP for Pharmacist Transaction Verification)
g. PMP will fill out the Cannabis Consult Recommendation when needed to communicate dosing guidelines and limits per QMP to the PCA's on the sales floor. (See SOP for Cannabis Consult Recommendation)

MONITORING:

- Pharmacist-in-Charge (PIC) will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

Caregiver Check-in

Purpose: Procedure for all JG Utah Pharmacists (PMP's) and Pharmacy Agents to follow to abide by the laws governing cannabis sales in Utah.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") employees working in our medical cannabis pharmacy facility who will be completing sales and customer check-ins.

Instructions:

1. Caregivers will be greeted at the front desk check-in.
2. PCA will obtain the caregiver's driver's license, passport or state accepted form of identification and their Utah Medical Cannabis Caregiver Card.
3. PCA will then check the caregiver's patient into the queue (MJ and LL).
4. If the patient is an existing Bloc pharmacy patient, the PCA will ask the caregiver if they have any questions for the PMP during this visit. The PCA will allow the caregiver entrance to the sales floor.
5. PCA will notify the PMP using Microsoft chat if the caregiver has questions.
6. PCA will alert the PMP if the caregiver's patient has a red thumbs down photo icon. (See SOP for Pharmacist Transaction Verification)
7. PMP will send the amount the caregiver can purchase for the patient to the agents at the register through Microsoft chat.
8. If the caregiver and patient are new to Bloc pharmacy, the PCA will alert the PMP via Microsoft Teams chat.
    a. PCA will ask the caregiver if they have had had an initial pharmacy consult at another pharmacy or if they need to meet with the PMP at Bloc.
    b. PCA will create a patient profile adding the patient's phone number, caregiver name and information, email address, gender and QMP. PCA will copy all information from the patient's MJ profile into LL. MJ profile and LL profile should be identical.
    c. PMP will verify the patient's card, QMP, notes and recommendation in EVS.
    d. PMP will perform initial consultation if needed. (See SOP for Patient Consultation Guide and Cannabis Consult Recommendation)
    e. PMP will place a note in the Additional Medical Marijuana Patient Information section detailing if counseling was done at Bloc or another pharmacy and the QMP's recommendation excluding all medical condition information.
    f. PMP will apply the appropriate photo icon. (See SOP for Pharmacist Transaction Verification)
    g. PMP will fill out the Cannabis Consult Recommendation when needed to communicate dosing guidelines and limits per QMP to the PCA's on the sales floor. (See SOP for Cannabis Consult Recommendation)

MONITORING:

- Pharmacist-in-Charge (PIC) will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

Patient Confidentiality

PURPOSE: All pharmacy agents must comply with Utah Department of Agriculture requirements as well as JG Utah, LLC (JG Utah) training requirements to maintain employment.

SCOPE: All JG Utah pharmacy agents.

INSTRUCTIONS:

1. Computer Screen Positioning to ensure patient confidentiality:
    a. POS computer screens will be positioned so that the screens are not visible to the public in order to protect patient information.
    b. Reception Desk computer for patient check-in will face away from the public allowing visibility solely to JG UT employee.
2. Paperwork or notes containing patient information:
    a. All JG UT employees will be trained on the proper disposal of any material containing patient information.
    b. All material containing patient information will be placed in the Shred-it receptacle for proper destruction/disposal.
    c. Shred-it will be scheduled for monthly destruction services.
3. All JG UT employees will be trained on the importance of patient confidentiality and instructed on best practices to maintain confidentiality.
    a. All JG UT employees will be required to follow HIPAA-like practices.

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.
- Upper management will maintain a checklist to ensure that each employee has completed the required trainings.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

TRACK AND TRACE TRAINING

PURPOSE: Because maintaining accurate inventory and quality control by ensuring compliance of Utah's regulations is critical for the medical cannabis pharmacy, all employees must complete Track and Trace training prior to beginning employment and annually thereafter.

SCOPE: All JG Utah, LLC ("JG Utah") employees.

INSTRUCTIONS:

Prior To Beginning Employment, All Employees Must Complete:

- Web-based instruction sessions on the MJ Freeway website pertaining to retail operations, seen here: https://budtender.training/tracks/a6ba5bd2-875b-11eb-8dcd-0242ac130003/classes/mj_platform
- Situational roleplaying with General Manager and our National Head of Retail Operations. Trainings will include:
    - Product sales;
    - Navigating the point of sale system interface;
    - Generating receipts;
    - Handling complaints;
    - Patient holds; and
    - Product Returns and recalls.
- *Yearly Thereafter, All Employees Must:*
- Complete additional web-based and in-person training related to the use of MJ Freeway. This training includes presentations and interactive sessions to help familiarize employees with all features and functions, as well as any updates to the software systems.
- Upper Management will review each agent's work procedures and determine if they require training in any of the procedures.
-

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.
- Upper management will maintain a checklist to ensure that each employee has completed the required trainings.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

QUALITY IMPROVEMENT

PURPOSE: To implement a process/plan to monitor performance of the personnel at the medical cannabis pharmacy.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") employees and management.

INSTRUCTIONS:

(a) implementation of an ongoing quality assurance program, that monitors performance of the personnel at the medical cannabis pharmacy;
(b) PIC will create a procedures handout weekly or monthly to review procedures that must be followed
(c) handout will provide clarification on past procedures and alerts agents of new procedures that must be followed.
(d) PIC/Upper Management will also provide educational materials to ensure agents are educated and up to date on the latest cannabis information
(e) yearly reviews will be performed to evaluate each employee's performance

MONITORING:

- Upper Management/PIC will monitor employees to ensure adherence to the outlined procedure.

BANK DEPOSITS

PURPOSE: JG Utah, LLC ("JG Utah") will use best business practices when it comes to cash management. JG Utah has been approved as a depositor with Utah First Credit Union. All bank deposits will be transported from the depository to Utah First Credit Union, by an armored car service.

SCOPE: This procedure applies to all JG Utah employees who will be responsible for preparing the bank/cash deposit.

INSTRUCTIONS:

1. All cash deposits will be prepared in the vault, a limited-access area. Limited-access employees must count and verify the amounts to be deposited. Two (2) employees will verify the sums to be deposited.
2. Cash will be counted utilizing cash counters. Per Utah First Credit Union instructions, cash will be taped by denominations. $20 bills or larger will all be face up and facing the same direction when taped; bills smaller than $20 must all be face up and facing the same direction.
3. All bound stacks of cash will be placed in a tamper resistant plastic cash bag. A bank deposit slip indicated the amount in each bag will be prepare by the limited access employee and placed within the bag with the cash (facing out in the back so it is readily visible). The form found on the front of the bag must be filled out and the tape pulled off the bag to seal it must be filled out as well.
4. A photograph of the completed deposit slip and cash bags must be taken.
5. After confirming pickup time, the armored vehicle will park at the side entrance of JGUT upon arrival. The armored car service employee will be signed in as a visitor by upper management on duty.
6. A limited access employee and/or Security Guard will transport the deposit to the armored car employee.
7. A transport manifest must be supplied by the armored car company that outlines the sums taken for deposit. The tape from each cash bag must be stapled to the manifest which must be filed and stored in the appropriate binder kept within the safe.
8. The cash deposit must be indicated on the "Cash in Safe" ledger as an "outflow" of cash.
9. The deposit should be scanned and emailed to the designated upper-level manager to log deposits into JG Utah accounting system, Sage.

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTIONS:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

CASH MANAGEMENT

PURPOSE: JG Utah, LLC ("JG Utah") will use best business practices in cash management, ensuring the safety of employees and patients. Under present conditions, all payments by patients will be made in cash. Cash drawers will be counted at the beginning and end of each business day. Cash drawers will be stored in a locked safe inside the locked vault, that must be accessed by two limited-access employees at any time.

SCOPE: This procedure applies to all JG Utah employees.

INSTRUCTIONS:

Start of Business Day

1. Limited-access employees will access the locked safe within the locked vault and remove the cash drawers at the start of business.
2. The cash in the drawers will be counted ensuring a $300 balance to begin the day.
3. Attempt to maintain at least $20 in singles should be made, depending on readily available denominations. If more single dollar bills are needed, upper management should be notified.
4. If necessary, adjustment to the amount of cash in the drawer.
5. The safe will be locked and the vault closed.
6. The cash drawers will be transferred to the point of sales counter, and double counted by Patient Care Advocate before making sales at the POS.

During Business Day

1. Money drops will be done by each PCA on the sales floor as needed based off of daily sales under upper management supervision.
2. Maintaining best practices requires each PCA to maintain control over his/her drawer and its contents, especially when emptying its contents. Upper management on duty will handle all cash movement from drawer to safe storage, as well as proper drop logging in MJ Freeway platform.
3. At the end of the day, the cash dropped from PCA's cash drawer will be combined with the cash in the safe to be prepared for deposit. A complete daily accounting will be made and entered into the cash log sheet.

End of Business Day

1. Once all doors are closed and locked at the end of business, cash drawers and bags will be assembled.
2. Using a cash counter, the cash will be counted and sorted from each drawer by each respective PCA.
3. Utilizing a cash Drawer Sheet, the sums will be compared to daily sales receipts to ensure no discrepancy exists and that the drawers are balanced.

4. If no discrepancy within $10 between cash sums and receipts exist, cash will be bundled by bill type and a limited-access employee will stored in the locked safe, within the locked vault. Cash will be counted a second time in the Vault prior to storing.
5. If a discrepancy outside of $10 exists, cash will be recounted (1-2 times). If still not rectified, a review of daily events will occur with an accounting from every employee who handled cash throughout the day. If necessary, a complete investigation will ensue, beginning with a review of surveillance video and consultation with Security Guards.

Change Requests

If a change swap is needed with our participating money service:

1. Fill Out Change Swap Request Form. Form is provided by banking service.
2. Scan and save as a PDF to the Change Swap folder located under accounting.
3. Email back to appropriate representatives at banking service.
4. Ensure that Swap Requests are sent in a timely manner.

(If you have a change request, the baking service needs to be notified by 4 pm the previous business day. Anyone requesting a change request for Monday needs to have the request in by 4 pm on Friday.)

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

STAFF ACCESS TO LAWS/RULES

PURPOSE: To outline the necessary procedures to allow all JG Utah staff access to the state laws and rules.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") pharmacies.

INSTRUCTIONS:

(a) have current and retrievable editions of the following reference publications, in electronic format, and readily available and retrievable to medical cannabis pharmacy personnel

(i) Title 26, Chapter 61a, Utah Medical Cannabis Act; and

(ii) R66 and R383, Utah Medical Cannabis Act Rules.

(b) material will be available via a link on the desktop of all computer: https://medicalcannabis.utah.gov/resources/utah-medical-cannabis-law/

MONITORING:

- Upper management and PIC will monitor to ensure adherence to the outlined procedure and educate staff about access to the laws/rules.

CLEANING THE PHARMACY:

PURPOSE: To ensure the health and wellness of our employees and the sanitation of our facility in accordance with accordance with state laws.

SCOPE: These procedures apply to all JG Utah, LLC ("JG Utah") employees who will work in our medical cannabis pharmacy facility.

INSTRUCTIONS:

General Cleaning Protocols:

1. At the end of each workday, Upper Management must ensure daily cleaning, utilizing the cleaning checklist.
2. All floors must be vacuumed. All glass surfaces must be cleaned with glass cleaner.
3. All surfaces that come in contact with patients and/or employee's hands must be sanitized daily. These items include, but are not limited to door handles, chair rails, light switches, keyboards, computer screens, countertops, tabletops, telephones and sink knobs.
4. Any scuffs on walls should be wiped (magic eraser).
5. All garbage pails must be emptied. Garbage must be brought out to the dumpster.
6. The bathroom and sink area must be sanitized and straightened.
7. All sitting areas must be straightened and cleaned.
8. If any contamination is suspected throughout the day, the area must be sanitized immediately.
9. Floors will be mopped and a deep clean of the bathroom will be performed weekly.
10. Wash, rinse, and sanitize contact surfaces of sinks, tables, equipment, utensils, carts, and equipment using the following procedure:
    a. Wash surface with detergent solution.
    b. Rinse surface with clean water.
    c. Place wet items in a manner to allow air drying.

Note: electronic items that cannot be cleaned with detergent and water must be wiped down with alternative, appropriate cleaning products (preferably anti-bacterial)

Cannabis Storage Area Cleaning:

1. Cannabis Storage areas will be cleaned no less than once per evening. If any contamination is suspected throughout the day, the area must be sanitized immediately.
2. An Agent will visually inspect the room to ensure it is free from insects, rodents or other pests.
3. All surfaces will be sanitized, including door handles, chair rails, light switches, countertops, tabletops.
4. If any items are not organized or in the correct storage space, employees will correct them.

5. Once cleaning is complete, Employees will request that the Inventory Coordinator double check the room to ensure it is adequately cleaned and organized.

MONITORING:

Employees will:

1. During all hours of operation, visually and physically inspect contact surfaces to ensure that the surfaces are clean.
2. Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Wash, rinse, and sanitize contact surfaces. Sanitize contact surfaces if it is discovered that the surfaces were not properly sanitized.

SELLING OR TRANSFERRING LICENSURE

PURPOSE: To outline acknowledge in written from that JG Utah, LLC is aware of the laws regarding selling or transferring licensure.

SCOPE: This procedure/acknowledgement applies to all JG Utah, LLC ("JG Utah") pharmacies.

INSTRUCTIONS:

(a) pursuant to *state law* a medical cannabis pharmacy license cannot be sold or transferred.

(b) JG Utah, LLC acknowledges the state of Utah does not allow the sale or transfer of pharmacy licenses.

(c) in the event that JG Utah has to close their pharmacy/pharmacies in Utah, they will forfeit their licenses.

(d) JG Utah, LLC will then follow procedures in SOP- Permanent Closure of Business (Section 1)

MONITORING:

- JG Utah, LLC will monitor the course of action pertaining to this SOP.

DAILY STAFFING

PURPOSE: To ensure proper staffing to ensure a PMP is always present when the pharmacy is open and allow for a reasonable ratio of of agents to pharmacists.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") pharmacies, pharmacists and agents.

INSTRUCTIONS:

1. Bloc cannabis pharmacy shall not distribute medical cannabis, or a medical cannabis device, to a medical cannabis cardholder, unless an employee who is a PMP is physically present and immediately available in the medical cannabis pharmacy.
2. Scheduling of PMPs to allow for overlap during the busiest hours (12p to 8p) also ensuring an adequate ratio of PMPs to agents.
3. Overlap allows one PMP to focus on consults and the other PMP to focus on patients with limits and new patients that do not require a consult.
4. Typical ratio does not exceed 1:5 (PMP:agent) excluding GM, AGM, Inventory Coordinator and Security.
5. No staff may access the pharmacy after hours alone.
6. It is mandatory that there must always be at least two employees in the pharmacy (one must be a security guard).
7. The GM, AGM, Supervisor, or PIC may enter an hour before opening to prepare the store, but there must be at least two employees present to enter the pharmacy. No one may enter alone.
8. Employees may remain after the pharmacy closes to perform close of business duties.
9. Employees and Security Guard will leave together and arm the pharmacy before leaving.
10. Employees will have access cards and agent cards on their persons at all times while on facility premises.

MONITORING:

- PIC and Upper Management will ensure adherence to the outlined procedure.

STORAGE OF EMPLOYEE LISTS

PURPOSE: To abide by state laws that require a procedure for storing employees lists.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") pharmacies with the aid of the national HR team

INSTRUCTIONS:

(a)the medical cannabis pharmacy, or parent company, shall maintain a record of not less than five years of the initials or identification codes that identify each PMP or pharmacy agent by name.

(b)the initial or identification code, shall be unique, to ensure that each PMP, or pharmacy agent, can be identified. Company issues a unique employee number to each employee. Employee's state agent number which is unique to them will also be kept on file.

(c) all employee identifiers will be kept digitally for at least five years.

(d) PAFs (personnel action forms) are kept on file with HR tracking all hiring an termination dates

(e) current roster of employees will be digitally provided to the UDAF upon request

MONITORING

:

- National JG Human Resources and Upper Management department will ensure adherence to the outlined procedure.

SECURITY AND SURVEILLANCE

PURPOSE: Security is of greatest importance to JG Utah, LLC ("JG Utah"). JG Utah has designed all operations to ensure the safety of employees and patients. During all business hours, Security Guards will be employed to ensure security at the pharmacy. They will follow the process outlined below.

Security and surveillance system will be inspected and all devices tested once per year.

The Security Director at JG Utah, or his assignee, will conduct monthly maintenance inspections to ensure that any repairs, alterations or upgrades to the security and surveillance systems are made for the proper operation of the system.

For a period of no less than hour (4) years, JG Utah will retain any and all records of inspections, servicing, alterations and upgrades performed on the systems and shall make them available to the Department of Agriculture upon request.

JG Utah will immediately notify the Department of Agriculture in the event of a mechanical malfunction of the security or surveillance system. JG Utah will obtain Department of Agriculture approval to implement alternative security measures that may include closure of JG Utah.

JG Utah designates its Security Director to continuously monitor security and surveillance systems at the facility. If he is unable to perform this monitoring function for any reason, he may assign the task to a member of the Security Team.

Within 2 days following a request, JG Utah will provide up to four (4) screen captures and/or an unaltered copy of a video surveillance recording to the Department or its authorized agents, law enforcement or other Federal, State or local government officials.

If JG Utah is notified in writing by the Department or its authorized agents, law enforcement or other Federal, State or local government officials of a pending criminal or administrative investigation for which a recording may contain relevant information, JG Utah will retain an unaltered copy of the recording for 4 years or until the investigation or proceeding is closed or the entity conducting the investigation or proceeding notifies the pharmacy that it is not necessary to retain the recording, whichever is longer

SCOPE: This procedure applies to all JG Utah Security Guards and any JG Utah employees involved in the daily security of the pharmacy.

INSTRUCTIONS:

1. Security guards will be stationed at the security desk. The security office will have Screens displaying the closed-circuit surveillance security system, monitoring the pharmacy at all times.

2. Reception desk agent will not allow any unregistered patients or caregivers onto the sales floor. Any unregistered guest allowed access for an appropriate reason will be signed in as a visitor (see SOP Unregistered Patients/Visitors to the Pharmacy).
3. Security Guards will be responsible for escorting vendors and/or contractors visiting the pharmacy and properly logging and monitoring that visit. (see SOP Visitors to the Pharmacy).
4. Security Guard will be accompanying the receipt of inventory into and the transfer of cash out of the pharmacy.
5. Security Guards must complete a thorough inspection of the pharmacy, both inside and outside the building, periodically throughout the day.
6. Security Guards will confirm each morning before the pharmacy opens that the patient entrance door to the pharmacy is locked and latching/closing correctly.
7. Security Guards will be available to patients should they request an escort to their vehicle upon leaving the pharmacy.
8. Security Guards will remain throughout the closing process and will accompany the staff departure (as a group) from the pharmacy.
9. Security Guards and Upper Management will walk the perimeter of the building checking all doors to make sure they are securely locked.
10. Security Guards will do hourly checks to confirm entry and restricted access doors are closing and locking correctly.

Security Checklist:

1. Before the start of business, the guard will take the 'JG Utah Security System Checklist' and check that all detectors, alarms, sensors and cameras are operating normally. The following must be checked throughout the entire pharmacy:
    - Motion detectors
    - Glass breakers
    - Swipe sensors
    - Door sensors
    - Fire detection sensors
    - Presence of sign posted on exterior of building that site under constant surveillance
    - Presence of sign posted on exterior of building that site is a Limited Access Area Sign
    - Accuracy of time stamp on surveillance camera footage
2. Once all items on checklist are initialed/completed, the checklist should be sign and dated.
3. The checklist must then be filed in the folder labeled 'Monthly Security Check' in the safe

The implementation of the above will not only enhance our security by ensuring all is as it should be but it conveys our appreciation for security to the neighbors and gives the guards a chance to refresh themselves to be more focused when at the desk.

MONITORING:

- Upper Management will monitor Security Guards and employees to ensure adherence to the outlined procedures.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action

CANNABIS CONSUMPTION AT THE PHARMACY PROHIBITED

PURPOSE: To outline guidelines for patients and employees regarding cannabis use on the pharmacy premises. USE IS PROHIBITED.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") employees and customers.

INSTRUCTIONS:

(a) Patient use on the premises is prohibited
   a. Two security guards are on duty at all times while the pharmacy is open. Security monitors all patients inside and outside of the building.
   b. Staff and security will verbally notify patients if necessary.
   c. Patients are made aware that there is no cannabis use/consumption at the pharmacy or the outside patio.
   d. There is also signage on the door stating, "The prohibition of consuming marijuana for medical use in a public place."(picture included below)

(b) Employee use on the premises is prohibited. Below is taken from the JG Employee Handbook:

8.2 Cannabis Consumption in the Workplace Is Prohibited

All employees must ensure that their judgement and performance are never impaired by cannabis or any other legal or illegal substance. This is especially important for those whose jobs involve activities that could significantly impact their own or others' safety. Employees must ensure that the safe performance of their duties and their behavior are never compromised by the consumption of cannabis; and, that they never put themselves or others at risk.

For purposes of this policy, cannabis consumption in the workplace includes:

- The use of cannabis, and cannabis products
- Coming to work under the influence, even if the cannabis consumption did not occur during work hours. (Off-duty cannabis use, while generally not prohibited by this policy, must not interfere with an employee's ability to perform the essential functions of their job)
- Smoking and using cannabis products while on Company premises or anywhere on Company property
- Smoking and using cannabis products in a Company vehicle or while traveling on Company business

Employees are further prohibited from illegally manufacturing, cultivating, distributing, or dispensing cannabis aside from cannabis manufactured, cultivated, distributed, or dispensed as part of the Company's operations.

MONITORING:

- Upper management, security guards, and PIC will monitor employees and patients to ensure adherence to the outlined procedures/regulations.

NOTICE



NO FIREARMS OR WEAPONS ALLOWED ON THIS PROPERTY



NO SMOKING ON PREMISES

THE PROHIBITION OF CONSUMING MARIJUANA FOR MEDICAL USE IN A PUBLIC PLACE, INCLUDING THE DEFINITION OF WHAT CONSTITUTES A PUBLIC PLACE PURSUANT OF THIS RULE

AREA UNDER VIDEO SURVEILLANCE
MONITORED BY LOCAL POLICE

NO BACKPACKS, NO LARGE BAGS
ALL BAGS ARE SUBJECT TO RANDOM SEARCH


NO
SMOKING
NO
VAPING
S-23486 ULINE 1-800-295-5510


WARNING
24 HOUR
VIDEO
SURVEILLANCE
NO TRESPASSING
Falcon CCTV SIGN-1007R

PERMANENT CLOSURE OF THE BUSINESS

PURPOSE: To outline the necessary procedures should the business permanently close. In the event the business should permanently close, the license will not be sold nor transferred.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") employees, management and specifically those in the compliance and accounting team.

INSTRUCTIONS: *Note: All hourly paid employees must punch out before leaving at the final business day. All employees will receive their final paycheck on their last day of work. In the event the business should permanently close, the license will not be sold nor transferred.*

(1) At least 14 days prior to the closing of the medical cannabis pharmacy, the pharmacist-in-charge will initiate the following:

(a) send written notice to the Department containing the following information:

(i) the name, address, and Department issued license number of the medical cannabis pharmacy.

(ii) surrender the license issued to the medical cannabis pharmacy;

(iii) a statement attesting:

(A) a comprehensive inventory has been conducted;

(B) the manner in which the medical cannabis product and medical cannabis device were transferred or disposed;

(C) the anticipated date of closing;

(D) the name, address, and Department issued license number of the medical cannabis pharmacy, or cannabis production establishment, acquiring the medical cannabis and medical cannabis device from the medical cannabis pharmacy that is closing;

(E) the date of transfer when the medical cannabis product and medical cannabis devices will occur; and,

(F) the name and address of the medical cannabis pharmacy to which the orders, including all refill information, and patient records, were transferred

(b) post a closing notice in a conspicuous place at all public entrance doors to the medical cannabis pharmacy which shall contain the following information:

(i) the date of closing; and

(ii) the name, address, and telephone number of the medical cannabis pharmacy acquiring the recommendation orders, including all refill information and customer records of the medical cannabis pharmacy.

(2) If the medical cannabis pharmacy closes suddenly due to fire, destruction, natural disaster, death, property seizure, eviction, bankruptcy, or emergency circumstances, and the PIC cannot provide notification 14 days prior to the closing, the PIC shall provide notification to the Department of the closing, no later than 24 hours after the closing.

(3) If the PIC is not available to comply with the requirements of this section, the owner or legal representative shall be responsible for compliance.

(4) On the date of the closing, the PIC shall remove all medical cannabis product, and any medical cannabis devices, from the medical cannabis pharmacy by one or a combination of the following methods:

(a) transport them to a cannabis processing facility for credit or disposal; or

(b) transfer or sell them to a person who is legally entitled to possess drugs, such as another medical cannabis pharmacy in the state of Utah.

(5) The PIC shall remove signs, and notify the landlord of the property that it is unlawful to use the word "medical cannabis pharmacy", or any other word or combination of words of the same or similar meaning, or any graphic representation that would mislead, or tend to mislead the public that a medical cannabis pharmacy is located at this address.

Day of Closing,

1. Remove all product from the sale floor (shelves and cabinets). Transfer to the inventory bins to be put in vault. Product will need to be destroyed or returned to producer.
2. An employee with limited access will deposit inventory bins in the vault once cash accounting is completed.
3. Reconcile all point of sales cash drawers using the 'Closing Drawer' feature in the MJ Freeway software. After drawers are closed, run the closing report in MJ Freeway, export to excel, and format properly. Send to EVP and GM for EOD Accounting.
4. Cash will be counted, sorted, bundled and stored in the safe in the vault by two (2) limited access employees. Cash deposits will be logged electronically by MJ Freeway and safe will be locked. (See SOP, Cash Management)
5. Complete daily cleaning in all areas of the pharmacy, following the 'Daily Cleaning Checklist'. (Vault will be cleaned first and then locked). Initial each section as it is completed to help with opening the next business day.
6. The breakdown of boxes should also be done and ***double-checked*** to ensure that no product remains.
7. Shut down all computers and turn off all lights in the pharmacy.
8. Turn on alarm system by selecting "Away."
9. Leave as a team, make sure that door is locked.

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.

LIGHTING AND VENTILATION

PURPOSE: To outline standards for facility lighting and ventilation.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") pharmacies.

INSTRUCTIONS:

(a) pharmacy will have an operating heating and cooling system in place. Yearly maintenance by an HVAC company will be performed.
(b) temperature in the store will be maintained at comfortable temperature depending on the season.
(c) vault will be maintained at 65 degrees Fahrenheit based on company policy for proper product temperature storage.
(d) adequate lighting per state inspection will be maintained during operating hours.
(e) after hours, security perimeter lights will remain on throughout the night. Security and Upper Management walk the perimeter each night to confirm that all lights are operational.

MONITORING:

- Upper Management and Security will ensure adherence to the outlined procedures.

CLOSURE DURING BUSINESS HOURS

PURPOSE: To outline procedures for notifying patients of closure during normal business hours. Every effort will be made by the pharmacy to remain open for patients during normally scheduled hours.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") pharmacies for all staff to follow.

INSTRUCTIONS:

In the event of a closure during business hours:

1. All patients with consultations will be called and offered to complete the consultation over the phone or be rescheduled.
2. In the event of an emergency and unexpected closure, the GM or AGM will add a notice to the website banner, a mass patient targeted email will be sent notifying patients of the closure and a notice will be placed on the front door.
3. Every effort will be made to reopen as soon as possible. If the pharmacy has been given an estimated time for reopening this will be relayed to the patients.
4. All patients with online orders will be called to notify of the closure and given the open to store their order in the vault for pick-up the following day.
5. As soon as the emergency has been managed and the pharmacy can resume business, a notice will be added to the website banner and a targeted email will be sent out.
6. In the event of a scheduled closure or change in hours (ex. Thanksgiving Day, Christmas Day, or other holidays), the pharmacy will place notices at the pharmacy two weeks in advance, a notice will be added to the website banner and the change will be added to targeted emails.

MONITORING:

- Upper management and PIC will monitor employees to ensure adherence to the outlined procedures.

VENDOR/VISITOR/EMPLOYEE ENTRY PROCEDURES

PURPOSE: There may be visitors at the pharmacy that will include vendors, contractors, maintenance workers, "helping hands" etc. Potential patients and unregistered caregivers are not permitted entry into the facility as no one without a MMJ patient or caregiver card is permitted access. Patients requiring assistance will be permitted one individual ("helping hand") to assist them. The entire facility is limited access and only open to those who have a MMJ patient or caregiver card. If visitors require admittance to limited access areas, they must present a valid government-issued identification, sign a Visitors Log, and wear an identification badge. Visitors to limited access areas will be accompanied at all times and may not touch any medical marijuana product.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah"). employees who will be logging, escorting or interacting with visitors throughout their visit to the pharmacy.

INSTRUCTIONS:

Contractors, Vendors, and Visitors:

1. The vendors and contractors will arrive at the back door of the pharmacy where he/she will be seen on the surveillance camera.
2. "Helping Hands" will arrive at the main door of the pharmacy where he/she will be greeted by a PCA or Security Guard.
3. The visitor/vendor/contractor will be allowed entrance once they have shown valid identification and credentials have been entered into the visitor log.
4. The visitor's information will be entered into the Visitors' Log. The Log must include, the full name of the visitor, the visitor's identification number, the time of arrival, time of departure, visitor badge number, and purpose of the visit.

   NOTE: The log will be maintained by the pharmacy for 5 years and will be made available to the Department of Health, state or local law enforcement, or other state or local government officials upon request if essential to performing the official's functions and duties. The Visitors' Log being stored on OneDrive will ensure JG UT can determine the security personnel who logged each visitor in and see any employee that modified the excel spreadsheet (log).

5. The visitor's government-issued identification must be verified by the PCA or Security Guard.
6. The visitor will be issued a badge that must be worn at all times while in the pharmacy. The identification badge must include a badge number.
7. Visitors may be permitted to visit limited access areas, but employees will ensure that visitors DO NOT touch medical marijuana products while in limited access areas.
8. Before departing, the Visitor's Badge must be returned. Departure time is entered into the log.

Employee:

1. Employees must retain a copy of their pharmacy agent card and photo ID while on duty at the pharmacy.
2. Employees will use their door fob to enter the pharmacy through the back door.
3. Entrance and exit of employees will be tracked electronically when using fob to enter and exit the building.

NOTE: Authorized members of the Department of AG and HHS and members of law enforcement are not considered visitors and will be allowed access immediately upon presentation of proper identification. Upper Management will be available to accompany them.

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

Actual or Suspected Criminal Activity

PURPOSE: To protect the safety of patients and employees and to accurately document and report real or potential criminal acts.

SCOPE: This procedure applies to all JG Utah Security Guards and any JG Utah employees involved in the daily security of the pharmacy.

INSTRUCTIONS:

1. If actual or suspected criminal activity is identified, management should immediately document the concern and include:
    a. Date
    b. Time
    c. Location
    d. Description
2. Review security footage of the incident and preserve relevant actions.
3. Review relevant inventory/cash audit reports to verify discrepancies or irregularities.
4. HR will be notified as soon as concern is notified and will be kept informed throughout each stage of review and investigation.
5. All findings, including inventory records, video evidence, and any related documentation, will be properly stored, recorded, and maintained.
6. Management will work in coordination with HR and UDAF to determine appropriate next steps, which may include further investigation, disciplinary action, or notification of law enforcement if warranted.
7. All matters will be handled confidentially in accordance with company policy.

MONITORING:

- Upper management will monitor security guards and employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP
2. Instruct employee on corrective action

EMPLOYEE THEFT

PURPOSE: JG Utah, LLC ("JG Utah") has implemented numerous measures to prevent any loss or theft of product. Should diversion be suspected, the PIC will immediately initiate a preliminary investigation. Any remaining discrepancy between the physical product and electronic inventory will result in a thorough investigation.

SCOPE: This procedure applies to all JG Utah employees.

INSTRUCTIONS:

1. Should there be a discrepancy, a preliminary investigation will be initiated.
2. Any employee who had access to the inventory will be questioned/consulted.
3. Security Guards will be consulted.
4. If the discrepancy cannot be resolved, a thorough investigation will be conducted. If criminal activity or diversion are suspected, the Department of Agriculture will be notified, and the local authorities contacted.
5. Any employee involved will be removed from the work schedule and isolated from inventory access.
6. In limited circumstances, the employee will be given a warning and after re-training will be allowed to return to work.
7. In most circumstances, in order to ensure public safety, compel regulatory compliance, protect the integrity of the security system and maintain the JG Utah reputation, the company will terminate its relationship with the employee.

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action

ARMED ROBBERY PROTOCOLS

PURPOSE: To ensure the safety and well-being of all staff, patrons and neighbors in and around the JG Utah Pharmacy.

JG Utah implemented multiple security measures to ensure safety including: designing security-oriented layout of premise, installing sophisticated security, alarm and surveillance systems, requiring Security Guard monitoring, and posting signage. Each employee will have access to panic buttons throughout JG Utah located at each POS, reception desk, pharmacist in charge office, and security office. All JG Utah employees will be trained that preservation of life is the greatest priority and must never be sacrificed for cash or product.

SCOPE: This procedure applies to all JG Utah employees.

INSTRUCTIONS:

Burglary/After Hours

1. Every point of entry at the pharmacy is alarmed, including 'glass breakers' on the windows. Motion sensors have been installed throughout the premises. Any unauthorized entry will be detected and trigger the alarm system which will notify a central station.
2. The central station will attempt contact with the individuals listed on the call list, in the designated order. If contact cannot be made with an authorized individual at JG Utah, the PIC or the Security Director, the local authorities will be dispatched. Central Station will attempt to reach additional individuals on the call list, including the EVP.
3. Call list to be updated regularly as staff changes.
4. The local authorities dispatched to JGUT will conduct a complete investigation. JGUT staff members will not re-enter the premises until local law enforcement so authorizes.
5. With the oversight of upper management, employees will offer complete cooperation with the authorities to assist with any investigation.

Armed Robbery

Should there be an active intruder, JG Utah employees will attempt to evacuate all employees and customers as quickly as possible. JG Utah does not promote the confrontation of an armed individual. S/he should be appeased to minimize risk and preserve safety.

1. If an individual on the Sales Floor presents a weapon and demands product or cash, give that individual anything s/he requests.
2. Evacuate the reception area and consultation rooms immediately.
3. Activate audible panic alarm as a last resort. They are located in the Security Office, at the Reception Desk, and at each POS area. Security authorities do not generally recommend the use of audible alarms as they serve to agitate the assailant rather than de-escalate the situation.
4. Allow intruder to exit.

5. Wait for authorities to arrive.

All employees will be instructed to examine and make note of as many of the following details as possible:

a. Identifying Characteristics: Height, weight, race, age, clothing, jewelry, sex, speech, scars, tattoos, unique conditions, and gait.

b. Type of weapon and where it was carried.

c. Direction that the suspect came from or headed in after leaving the pharmacy.

d. What the suspect said.

e. Everything the suspect touched. If hands are not gloved, fingerprints could be left behind.

f. If handed a note, drop it to the floor or place out of sight so that it can be kept as evidence.

Procedure After Robbery:

In consultation with the JG Utah Security Team, JG Utah will predetermine employee(s) responsibility in emergency situation. Employees will be assigned tasks including: ensuring doors are locked, calling police, caring for injured, noting the getaway car, and protecting evidence.

1. Should the activation of the silent and audible alarms fail to trigger police response, any able employee will be responsible for calling 911 to report the incident. Employee(s) will provide the following details:

    a. Name

    b. Location

    c. Incident that occurred

    d. Any potential hazards to the building/property

    e. Loss of any product/cash

    f. If anyone is injured

    NOTE: Stay on the phone until instructed that it is OK to hang up.

2. Lock all doors.

3. Ask all witnesses to remain and start writing down their account of the incident. Witnesses should write down their own account before talking with others, if possible.

4. Do NOT allow anyone else entry into the building until the site is secured and cleared by the responding officers.

5. Do NOT touch any potential evidence until given the OK by responding officers.

6. All employees will offer full and complete cooperation with law enforcement.
7. Cash and inventory will be counted within 24 hours of incident to determine potential variances.

MONITORING:

- The upper management will regularly review these procedures with employees and implement practice drills.
- The upper management will monitor employees to ensure adherence to the outlined procedures.

CORRECTIVE ACTIONS:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

MEDICAL CANNABIS WASTE MANAGEMENT

PURPOSE: To ensure the secure and safe destruction of medical cannabis waste.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") employees who will be handling expired, damaged, mislabeled, opened products, or any other medical cannabis waste.

INSTRUCTIONS:

1. Cannabis waste products/defective products are placed in a Ziploc bag and marked with the date of isolation.
2. The Ziploc bag is then placed in the safe labeled "QUARANTINED PRODUCT NOT FOR SALE OR USE" located in the Vault pending disposal.
3. The Inventory Coordinator will move the products from Active MJ inventory into the Destruction/Defectives room in MJ by performing a split-package. He will then add the product to the Destruction Log (Excel spreadsheet).
4. Using the Destruction Log Excel form – Enter all fields on the form. The log will include: (1) return date; (2) destruction date; (3) type of the cannabis product; (4) the manufacturer, name of product/strain, weight, batch number and quantity; (5) the reason for disposal; (6) the method of destruction/disposal.
5. Riverside Products are placed back into the safe in the vault that is labeled "QUARANTINED PRODUCT NOT FOR SALE OR USE" until they are returned to the manufacturer. A sales order will be made to transfer the defective products back to the manufacturer. When the transfer is picked up and completed the products will be removed from the Defectives room in MJ. Riverside products are the only defective products that are returned to the manufacturer.
6. Once a month (last week of the month), the PIC and an IC Employee will prepare the Waste Disposal Area in the Vault with all necessary tools for the destruction (cat litter, container, garbage bags, shears, etc.) and ensure that the process will be recorded by cameras.
7. Employees will remove the patient label (to be placed in the shred bin) from each affected product if the packaging was returned with the product and throw away the packaging.
8. Cartridges are physically crushed with shears and mixed with cat litter then flower, edibles, topicals, concentrates are also added to the cat litter and completely covered by cat litter. Finally, water is poured over the top of the cat litter.
9. The container is double bagged in an opaque bag and taken to the dumpster.
10. PIC enters the destruction date and time into the Destruction Log, and also removes all of the items from the Destruction/Defectives room in MJ inventory.

MONITORING:

- PIC and Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTIONS:

1. Retrain any employee found not following the procedures in this SOP
2. Instruct employee on corrective action

RECALL PROTOCOLS

PURPOSE: To ensure the safety of patients and quality of medical marijuana product at JG Utah, LLC ("JG Utah"). To efficiently and safely return all affected product to the Grower/Processer (G/P).

SCOPE: This procedure applies to all JG Utah employees who will be handling product recalls.

INSTRUCTIONS:

Once JG Utah receives notification from a patient, caregiver or practitioner that an adverse event occurred:

1. Notify the Pharmacist-in-Charge ("PIC")/Upper Management who shall act as the Recall Coordinator.
2. The Recall Coordinator will immediately contact the Department, Utah Department of Agriculture and Food, and the cannabis production establishment from which it obtained the cannabis product in question.
3. Pharmacist/Upper Management will consult with G/P to determine the specific batches/lots that may be affected.
4. Employees will begin identifying and isolating any potentially affected product.
5. All potentially affected product will be removed from inventory. A limited access employee will deliver the quarantined product to the lock box in the vault labeled 'Hazardous Waste/Recall Product' and ensure the lock box is secure.
6. Utilizing MJ Freeway seed–to–sale software, employees will run a search for all potentially affected product sold from the potentially affected batch.
7. All available employees will contact patients who have been sold the affected product.
8. Contacted patients will be given instructions for immediate product return.
9. Upon receipt of returned product, a limited access employee will deliver the quarantined product to the lock box in the vault labeled 'Quarantined Product' and ensure the lock box is secure.
10. JG Utah will coordinate the return of affected product to the G/P.
11. Log the affected product as quarantined/recalled in MJ Freeway software.

Recalls and products being returned to processor the inventory coordinator will:

1. Initiate a transfer in MJ Freeway and set it to "out for delivery".
2. When the manufacturer arrives, it will be removed from the quarantine safe.

3. Paperwork will be completed/signed by inventory coordinator and driver picking up recalled product.

If mandatory or voluntary recall confirmed with Dept. of Ag. and/or G/P:

1. Employees will begin identifying and isolating any potentially affected product.
2. Utilizing the MJ Freeway, employees will run a search for all potentially affected product sold from the potentially affected batch.

Patient Communications:

1. The Recall Coordinator will direct all available employees will contact patients by phone who have been sold the affected product.
2. Any purchaser contacted will be provided with the following information: (1) The name and serial numbers of the recalled products, and the date when the recalled products were sold; (2) Whether the recall was mandatory or voluntary; (3) The reason for the recall and whether any health concerns exist; and (4) Procedures for return of the affected products.
3. Patients will be asked for their e-mail and mailing address so that we may send any needed follow-up information.
4. The Recall Coordinator ensure that a Recall Letter is sent to all affected purchasers by certified USPS including: (1) Our company name and contact information (telephone, e-mail, and mailing address); (2) The name and serial numbers of the recalled products, and the date when the recalled products were sold; (3) Whether the recall was mandatory or voluntary; (4) The reason for the recall and whether any health concerns exist; (5) Procedures for quarantining the product and a direction not to use the products in question; and (6) Procedures for returning the product.
5. The Recall Coordinator will direct web developer to immediately post Recall Notice notification at the top of our webpage with a link to additional information. The link will be prominently and conspicuously displayed so that any browser of our website will immediately see the Recall Notice.
6. Upon receipt of returned product, a limited access employee will deliver the quarantined product to the lock box in the vault labeled ‘Hazardous Waste/Recall Product’ and ensure the lock box is secure.

Product Quarantine:

JG Utah will coordinate the return of affected product with the G/P, but any affected products held or received by our facility will be quarantined according to the following procedures:

1. Upon receiving products requiring quarantine, Employees will inspect all the products and document the following information in our Recall Log: (1) Whether the container is damaged or defective; (2) The serial number of each product; (3) The originating entity (cultivation center, craft grower, infuser); (4) The date of sale to our pharmacy and purchase by a customer (if applicable); (5) The likelihood of the spread of contamination to our facility or to other inventory; (6) Any health, sanitation, safety, or security threats posted by such products; and (7) Update our electronic inventory system to reflect the transfer of the products to the Quarantine Product Lock Box.
2. Following inspection, the Inventory Control Manager will store all affected cannabis products in the appropriately designated commercial-grade, lockable and air-tight storage bin for safe storage of the quarantined products ("Quarantine Product Lock Box").
3. The Quarantine Product Lock Box will be stored in the Vault Room.
4. Upper management will ensure that the lock box is secure and await further instruction from the Department.

MONITORING:

- The PIC (Recall Coordinator) and Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTIONS:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

INCOMING DELIVERIES & RECEIVING/STORING INVENTORY (Saint George)

PURPOSE: To ensure that deliveries are being handled in an efficient and safe manner, following Department of Agriculture regulations and to avoid any potential diversion. JG Utah, LLC ("JG Utah") will be receiving inventory on a regular basis. To prevent loss or diversion upon delivery, inventory will be taken immediately upon receipt of product and compared to the transport manifest. Any person delivering product will be logged into the Visitors Log and accompanied at all times (see SOP, Visitors at the Pharmacy).

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") employees who will be accepting deliveries and receiving product into inventory.

INSTRUCTIONS:

1. Every delivery is scheduled prior to delivery.

2. The vendor will arrive at the side door of the pharmacy where he/she will be seen on the surveillance camera.

3. Security Guard will follow SOP guidelines for vendor/visitor entry procedures/check-in. He will allow them in to the delivery entrance check-in area.

4. Vendors must follow our visitor entry procedures/check-ins.

5. The Security Guard will alert Upper Management of the delivery's arrival.

6. Authorized personnel for receiving inventory are Upper management (AGM, GM, Supervisors, PIC, Inventory Coordinator) and inventory clerks.

7. Upper Management or an inventory clerk will help unload the delivery and will escort the delivery driver through the restricted access fob doors to the vault.

8. Deliveries will be counted and entered into MJ within 48 hours.

9. Upper Management and Inventory Coordinator will count product in the vault and verify incoming count matches the Transport Manifest received from the driver who is making the delivery. All manifests must be from the state mandated seed to sale system MJ Freeway.

10. Once the count is completed and product matches what is on the manifest, a Bloc employee and the delivery person will sign and date the Transport Manifest and retain a copy of the signed manifest for our records.

11. Upper management will immediately place items in the correct storage area within the vault.

12. Cameras will capture the delivery arriving outside, another camera at the delivery entrance check-in entrance area, two cameras in the hallway will follow it to the vault which also has a camera to capture the count/reconciliation of the manifest.

13. If the G/P delivery accepts COD, make upper management aware so that cash can be retrieved to pay the outstanding invoice.

14. Upon leaving, vendor will return Visitor's badge, and time out will be entered on Visitor's log.

RECEIVING & STORING DELIVERY:

1. After the count and physical delivery of product to the items listed on the transport manifest is verified, Upper Management will inspect product to ensure that the warning label is on each package.

2. If there is any discrepancy between the product delivered and the product listed on the transport manifest, the GP must be contacted immediately, and the discrepancy reconciled.

3. If there is no discrepancy, the person making the delivery will be dismissed, his/her departure time will be noted on the Visitor's Log, and the badge returned.

4. Products will be sorted and stored in the appropriate vault location.

5. It will be sorted and stored in the appropriate vault location.

6. For products with multiple batches, determine which box has the soonest expiration date and sell those products first. Two employees will verify the count, sign and date the other box, then seal it with tamper proof tape. Inventory Coordinator will sign the tamper proof tape.

7. Products will remain in the vault and the vault locked.

8. The accepted inventory will be logged into the seed-to-sale software (MJ Freeway).

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.

2. Instruct employee on corrective action.

RECEIPTS AND LABELS

PURPOSE: To protect the safety of patients by ensuring receipts and labels contain appropriate and required information.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") employees working in our medical cannabis pharmacy facility who will be completing sales.

INSTRUCTIONS:

1. Complete the patient's order in the MJ Freeway seed-to-sale software.
2. Complete the transaction by collecting payment for the product.
3. Once payment is posted, the employee can print receipts for the products purchased in accordance with the requirements set forth by the Department of Agriculture.
4. The label will be printed and adhered to the products sold. Labels will contain the following:
    a. name of the grower/processor, address and permit number
    b. the name of the pharmacy, address and permit number
    c. the form and species of medical cannabis
    d. the percentage of THC and CBD contained in the medical cannabis product
    e. quantity of medical cannabis
    f. packaging date
    g. "use by" or expiration date
    h. the approved 'Warning'
    i. number of individual doses
    j. instructions for the proper storage
5. The receipt will be printed and given to the patient or caregiver. All receipts must contain the following:
    a. The name, address and any permit number assigned to the pharmacy.
    b. The name and address of the patient and, if applicable, the patient's caregiver.
    c. The date the medical marijuana was dispensed.
    d. The form and the quantity of medical cannabis dispensed.
6. The labeled product will be placed in a sealed opaque bag. The bag will then be given to the patient or caregiver.

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP
2. Instruct employee on corrective action

INVENTORY MANAGEMENT

PURPOSE: Inventory management is vital to the operation of the business. Strict adherence to JG Utah, LLC ("JG Utah") inventory policy will be upheld

SCOPE: This procedure applies to all JG Utah. employees.

INSTRUCTIONS:

Vault:

1. All products must be stored in the vault, what is needed for the day will be transferred to the sales floor display cases and behind the POS stations before the start of business and then returned to the vault upon closing.

2. Display cases will be locked; however, we will strive to have zero live products in the cases.

3. The product will be stored in the vault by type of product then by the grower/manufacturer.

4. The smallest bins available should be used to accommodate the product that is in stock.

5. If product is pulled from the bin, the quantity on the front of the bin/box must be changed accordingly.

6. If there are multiple sku's for each item then the two sku's must be separated by a divider within the bin. One batch will be sold in its entirety before selling the next batch.

7. The sku/batch that expires first must be sold first.

Sales Floor:

1. Product bins from behind the POS stations are taken into the vault at the end of each business day and stored on shelves designated for the POS product bins.

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTIONS:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

INVENTORY CONTROLS

PURPOSE: Inventory management is vital to the operation of the business. Strict adherence to JG Utah, LLC ("JG Utah") inventory policy will be upheld which is why inventory controls have been put into place.

SCOPE: This procedure applies to all JG Utah employees in Saint George.

INSTRUCTIONS:

Sales:

- All products must be processed through the state-mandated POS system and must be sold using a scanner.

Accepting Orders:

- All product that is received via grower/processor must be physically counted.
- All received product must be integrated into existing inventory via MJ Freeway.

Daily Counts:

- To prevent diversion, inventory counts will be performed each morning.
- Counts are preformed daily at 7:45 with different products counted each day. We will be counting through the whole inventory stock within a 10 day period
- Investigation and reconciliation of any discrepancies will be completed within 24 hours.
- The state will be notified of any major discrepancies that cannot be reconciled.

MONITORING:

- Inventory Coordinator and PIC will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

PROHIBIT SALE OF CERTAIN PRODUCTS

PURPOSE: To outline products that may not be sold at the pharmacy

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") employees, management and and PMPs.

INSTRUCTIONS:

1. Bloc cannabis pharmacy shall not dispense:
    a. Expired products,
    b. Damaged products,
    c. Deteriorated products,
    d. Misbranded products,
    e. Adulterated products, or
    f. opened medical cannabis products
2. The sku/batch that expires first must be sold first in order to prevent selling expired meds.
3. Any meds that are near expiration shall be placed on a spreadsheet and place a reminder in Teams Calendar to check the product on the day before the expiration date.
4. When stocking the POS, inventory clerk will check the expiration dates.

MONITORING:

- Upper Management and PIC will monitor employees and Inventory Coordinator to ensure adherence to the outlined procedure.

Pharmacy Operation Change Request Form

Please limit change request form to one (1) request item and one (1) location. Please allow sufficient time for Department review and response. Additional information may be requested after submission. Ruling affiliated with chnages made to Pharmacy can be found in: 4-41a-103, 4-41a-108, 4-41a-1001, 4-41a-1002, 4-41a-1004, 4-41a-1101, 4-41a-1104, R66-5-3, R66-5-4, R66-5-5, R66-5-7, R66-5-8, R66-5-9, R66-5-10, R66-5-11, R66-5-15 & R66-5-22

Change Request Information

Cannabis Facility: BLOC Pharmacy, Saint George UT

[redacted]

Change Request Details

Specify area of change

___ New owner/Director/Financial backing	___ Change in Operating Plan: SOP/ General
___ Change in Company Structure	___ Change in Educational Material
___ Change in facility name	___ Change in hours
___ Change in Location	___ Changes in electronic systems: ICS/POS/Security
___ Change in facility physical charachteristics/floor plan	___ Changes in vehicles
___ Change in PIC	___ Other - provide brief description:
_X_ Change in Operating Plan: SOP, Storage, Security Plan, or Training	

Does this require additional permits? ___ Yes __X_ No - Explain: We are changing our inventory controls SOP.

Summary of proposed change. *This statement will be read at the public licensing board meeting.*

We are changing our inventory controls SOP to meet the current guidelines. We will not be preforming EOM reports anymore.

Submit a Change Request Application. Please attach **ALL** information from the checklist that will be affected.

1) Date changes should go into affect. Provide timeline or phases if applicable.
2) New/proposed address or facility contact information.
3) New building blueprint - Floor plan and cameras
4) SOPs/Protocols affected by the change in operating plan
5) Vehicle information as rewquired in current ruling/codes
6) Credentials of new PIC
7) Submit new owner/Director background information - UDAF background authorization form, payment & fingerprints
8) Submit new business license from city
9) Updated bond
10) Educational material - Agent or pateint targeted
11) Any supporting documents for the change request

INVENTORY CONTROLS

PURPOSE: Inventory management is vital to the operation of the business. Strict adherence to JG Utah, LLC ("JG Utah") inventory policy will be upheld which is why inventory controls have been put into place.

SCOPE: This procedure applies to all JG Utah employees in Saint George.

INSTRUCTIONS:

Sales:

- All products must be processed through the state-mandated POS system and must be sold using a scanner.

Accepting Orders:

- All product that is received via grower/processor must be physically counted.
- All received product must be integrated into existing inventory via MJ Freeway.

Daily Counts:

- To prevent diversion, inventory counts will be performed each morning.
- Counts are preformed daily at 7:45 with different products counted each day. We will be counting through the whole inventory stock within a 10 day period
- Investigation and reconciliation of any discrepancies will be completed within 24 hours.
- The state will be notified of any major discrepancies that cannot be reconciled.

MONITORING:

- Inventory Coordinator and PIC will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.
2. Instruct employee on corrective action.

Pharmacy Operation Change Request Form

Please limit change request form to one (1) request item and one (1) location. Please allow sufficient time for Department review and response. Additional information may be requested after submission. Ruling affiliated with chnages made to Pharmacy can be found in: 4-41a-103, 4-41a-108, 4-41a-1001, 4-41a-1002, 4-41a-1004, 4-41a-1101, 4-41a-1104, R66-5-3, R66-5-4, R66-5-5, R66-5-7, R66-5-8, R66-5-9, R66-5-10, R66-5-11, R66-5-15 & R66-5-22

Change Request Information

Cannabis Facility:

[redacted]

Change Request Details

Specify area of change

___ New owner/Director/Financial backing	___ Change in Operating Plan: SOP/ General
___ Change in Company Structure	___ Change in Educational Material
___ Change in facility name	___ Change in hours
___ Change in Location	___ Changes in electronic systems: ICS/POS/Security
X Change in facility physical charachteristics/floor plan	___ Changes in vehicles
___ Change in PIC	___ Other - provide brief description:
___ Change in Operating Plan: SOP, Storage, Security Plan, or Training	

Does this require additional permits? ___ Yes X No - Explain:

Summary of proposed change. *This statement will be read at the public licensing board meeting.*

Cut opening in existing bank vault. Install new security door with access control.
Remove existing vault door, replace with standard flush metal door & lever-set. Provide access control. Add 3 Cameras to New Vault.

Submit a Change Request Application. Please attach **ALL** information from the checklist that will be affected.

1) Date changes should go into affect. Provide timeline or phases if applicable. Timeline included
2) New/proposed address or facility contact information.
3) New building blueprint - Floor plan and cameras Floorplan included
4) SOPs/Protocols affected by the change in operating plan
5) Vehicle information as rewquired in current ruling/codes
6) Credentials of new PIC
7) Submit new owner/Director background information - UDAF background authorization form, payment & fingerprints
8) Submit new business license from city
9) Updated bond
10) Educational material - Agent or pateint targeted
11) Any supporting documents for the change request

Pharmacy Operation Change Request Form

Please limit change request form to one (1) request item and one (1) location. Please allow sufficient time for Department review and response. Additional information may be requested after submission. Ruling affiliated with chnages made to Pharmacy can be found in: 4-41a-103, 4-41a-108, 4-41a-1001, 4-41a-1002, 4-41a-1004, 4-41a-1101, 4-41a-1104, R66-5-3, R66-5-4, R66-5-5, R66-5-7, R66-5-8, R66-5-9, R66-5-10, R66-5-11, R66-5-15 & R66-5-22

Change Request Information

Cannabis Facility:

[redacted]

Change Request Details

Specify area of change

___ New owner/Director/Financial backing	___ Change in Operating Plan: SOP/ General
___ Change in Company Structure	___ Change in Educational Material
___ Change in facility name	___ Change in hours
___ Change in Location	___ Changes in electronic systems: ICS/POS/Security
X Change in facility physical charachteristics/floor plan	___ Changes in vehicles
___ Change in PIC	___ Other - provide brief description:
___ Change in Operating Plan: SOP, Storage, Security Plan, or Training	

Does this require additional permits? ___ Yes X No - Explain:

Summary of proposed change. *This statement will be read at the public licensing board meeting.*

Provide and install new transaction drawer with audio capabilities and deeper (8-10" drawer depth. Add (2) exterior grade cameras.

Submit a Change Request Application. Please attach **ALL** information from the checklist that will be affected.

1) Date changes should go into affect. Provide timeline or phases if applicable. Timeline provided.
2) New/proposed address or facility contact information.
3) New building blueprint - Floor plan and cameras Floor plan provided.
4) SOPs/Protocols affected by the change in operating plan
5) Vehicle information as rewquired in current ruling/codes
6) Credentials of new PIC
7) Submit new owner/Director background information - UDAF background authorization form, payment & fingerprints
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Change Request Information

Cannabis Facility:

[redacted]

Change Request Details

Specify area of change

___ New owner/Director/Financial backing	___ Change in Operating Plan: SOP/ General
___ Change in Company Structure	___ Change in Educational Material
___ Change in facility name	___ Change in hours
___ Change in Location	___ Changes in electronic systems: ICS/POS/Security
X Change in facility physical charachteristics/floor plan	___ Changes in vehicles
___ Change in PIC	___ Other - provide brief description:
___ Change in Operating Plan: SOP, Storage, Security Plan, or Training	

Does this require additional permits? ___ Yes X No - Explain:

Summary of proposed change. *This statement will be read at the public licensing board meeting.*

We are removing the wall between the overflow vault and transaction room, to make this one room for the overflow vault.
We will maintain the existing cameras in this room.

Submit a Change Request Application. Please attach **ALL** information from the checklist that will be affected.

1) Date changes should go into affect. Provide timeline or phases if applicable. timeline inculded
2) New/proposed address or facility contact information.
3) New building blueprint - Floor plan and cameras
4) SOPs/Protocols affected by the change in operating plan
5) Vehicle information as rewquired in current ruling/codes
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Change Request Information

Cannabis Facility:

[redacted]

Change Request Details

Specify area of change

___ New owner/Director/Financial backing	___ Change in Operating Plan: SOP/ General
___ Change in Company Structure	___ Change in Educational Material
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X Change in facility physical charachteristics/floor plan	___ Changes in vehicles
___ Change in PIC	___ Other - provide brief description:
___ Change in Operating Plan: SOP, Storage, Security Plan, or Training	

Does this require additional permits? ___ Yes X No - Explain:

Summary of proposed change. *This statement will be read at the public licensing board meeting.*

8 total POS Cabinets & Tops. Provide power & data to each POS station. These stations will be pushed forward from where the existing stations are now (see plan).Half-height swing door with spring hinges and keyed deadbolt.Knee wall created using matching millwork material. We are adding 2 new cameras for the pos stations.

Submit a Change Request Application. Please attach **ALL** information from the checklist that will be affected.

1) Date changes should go into affect. Provide timeline or phases if applicable. timeline provided.
2) New/proposed address or facility contact information.
3) New building blueprint - Floor plan and cameras Flooor plan provided.
4) SOPs/Protocols affected by the change in operating plan
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Change Request Information

Cannabis Facility:

[redacted]

Change Request Details

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___ New owner/Director/Financial backing	___ Change in Operating Plan: SOP/ General
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___ Change in PIC	___ Other - provide brief description:
X Change in Operating Plan: SOP, Storage, Security Plan, or Training	

Does this require additional permits? ___ Yes X No - Explain:

Summary of proposed change. *This statement will be read at the public licensing board meeting.*

This is our new Point of Sale SOP to ensure that all patients receive access to the information as outlined in 4-41a-1101(12)(i) and 26B-4-201(41).

Submit a Change Request Application. Please attach **ALL** information from the checklist that will be affected.

1) Date changes should go into affect. Provide timeline or phases if applicable.
2) New/proposed address or facility contact information.
3) New building blueprint - Floor plan and cameras
4) SOPs/Protocols affected by the change in operating plan
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9) Updated bond
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11) Any supporting documents for the change request

RECEIPTS AND LABELS

PURPOSE: To protect the safety of patients by ensuring receipts and labels contain appropriate and required information.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") employees working in our medical cannabis pharmacy facility who will be completing sales.

INSTRUCTIONS:

1. Complete the patient's order in the MJ Freeway seed-to-sale software and Dutchie.
2. Complete the transaction by collecting payment for the product.
3. Once payment is posted, the employee can print receipts for the products purchased in accordance with the requirements set forth by the Department of Agriculture.
4. The label(s) will be printed and placed in the patient's bag with the purchased products. Labels will contain the following:
    a. name of the grower/processor, address and permit number
    b. the name of the pharmacy, address and permit number
    c. the form and species of medical cannabis
    d. the percentage of THC and CBD contained in the medical cannabis product
    e. quantity of medical cannabis
    f. packaging date
    g. "use by" or expiration date
    h. the approved 'Warning'
    i. number of individual doses
    j. instructions for the proper storage
5. The receipt will be printed and given to the patient or caregiver. All receipts must contain the following:
    a. The name, address and any permit number assigned to the pharmacy.
    b. The name and address of the patient and, if applicable, the patient's caregiver.
    c. The date the medical marijuana was dispensed.
    d. The form and the quantity of medical cannabis dispensed.
    e. To ensure that all patients receive access to the information as outlined in 4-41a-1101(12)(i) and 26B-4-201(41), the link to the new UDAF patient insert is included on the bottom of every patient's receipt (medicalcannabis.utah.gov/info) and the QR code link has been placed at every POS register.

i. Printed copies will be available in the pharmacists' office in the information handout file folders for all patients that do not have access to the internet or patients who request a hard copy of the insert.

6. The product(s) will be placed in an opaque bag. The bag will then be given to the patient or caregiver.

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP
2. Instruct employee on corrective action

Pharmacy Operation Change Request Form

Please limit change request form to one (1) request item and one (1) location. Please allow sufficient time for Department review and response. Additional information may be requested after submission. Ruling affiliated with chnages made to Pharmacy can be found in: 4-41a-103, 4-41a-108, 4-41a-1001, 4-41a-1002, 4-41a-1004, 4-41a-1101, 4-41a-1104, R66-5-3, R66-5-4, R66-5-5, R66-5-7, R66-5-8, R66-5-9, R66-5-10, R66-5-11, R66-5-15 & R66-5-22

Change Request Information

Cannabis Facility:

[redacted]

Change Request Details

Specify area of change

___ New owner/Director/Financial backing	___ Change in Operating Plan: SOP/ General
___ Change in Company Structure	___ Change in Educational Material
___ Change in facility name	___ Change in hours
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___ Change in PIC	___ Other - provide brief description:
X Change in Operating Plan: SOP, Storage, Security Plan, or Training	

Does this require additional permits? ___ Yes ___ No - Explain:

Summary of proposed change. *This statement will be read at the public licensing board meeting.*

Changing current Point of Sale-Receipts and Labels SOP to say labels will be placed in the patients bag: Line 4: The label(s) will be printed and placed in the patient's bag with the purchased products.

Submit a Change Request Application. Please attach **ALL** information from the checklist that will be affected.

1) Date changes should go into affect. Provide timeline or phases if applicable.
2) New/proposed address or facility contact information.
3) New building blueprint - Floor plan and cameras
4) SOPs/Protocols affected by the change in operating plan
5) Vehicle information as rewquired in current ruling/codes
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10) Educational material - Agent or pateint targeted
11) Any supporting documents for the change request

RECEIPTS AND LABELS

PURPOSE: To protect the safety of patients by ensuring receipts and labels contain appropriate and required information.

SCOPE: This procedure applies to all JG Utah, LLC ("JG Utah") employees working in our medical cannabis pharmacy facility who will be completing sales.

INSTRUCTIONS:

1. Complete the patient's order in the MJ Freeway seed-to-sale software and Dutchie.
2. Complete the transaction by collecting payment for the product.
3. Once payment is posted, the employee can print receipts for the products purchased in accordance with the requirements set forth by the Department of Agriculture.
4. The label(s) will be printed and placed in the patient's bag with the purchased products. Labels will contain the following:
    a. name of the grower/processor, address and permit number
    b. the name of the pharmacy, address and permit number
    c. the form and species of medical cannabis
    d. the percentage of THC and CBD contained in the medical cannabis product
    e. quantity of medical cannabis
    f. packaging date
    g. "use by" or expiration date
    h. the approved 'Warning'
    i. number of individual doses
    j. instructions for the proper storage
5. The receipt will be printed and given to the patient or caregiver. All receipts must contain the following:
    a. The name, address and any permit number assigned to the pharmacy.
    b. The name and address of the patient and, if applicable, the patient's caregiver.
    c. The date the medical marijuana was dispensed.
    d. The form and the quantity of medical cannabis dispensed.
    e. To ensure that all patients receive access to the information as outlined in 4-41a-1101(12)(i) and 26B-4-201(41), the link to the new UDAF patient insert is included on the bottom of every patient's receipt (medicalcannabis.utah.gov/info) and the QR code link has been placed at every POS register.

i. Printed copies will be available in the pharmacists' office in the information handout file folders for all patients that do not have access to the internet or patients who request a hard copy of the insert.

6. The product(s) will be placed in an opaque bag. The bag will then be given to the patient or caregiver.

MONITORING:

- Upper management will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP
2. Instruct employee on corrective action

Pharmacy Operation Change Request Form

Please limit change request form to one (1) request item and one (1) location. Please allow sufficient time for Department review and response. Additional information may be requested after submission. Ruling affiliated with chnages made to Pharmacy can be found in: 4-41a-103, 4-41a-108, 4-41a-1001, 4-41a-1002, 4-41a-1004, 4-41a-1101, 4-41a-1104, R66-5-3, R66-5-4, R66-5-5, R66-5-7, R66-5-8, R66-5-9, R66-5-10, R66-5-11, R66-5-15 & R66-5-22

Change Request Information

Cannabis Facility:

[redacted]

Change Request Details

Specify area of change

___ New owner/Director/Financial backing	___ Change in Operating Plan: SOP/ General
___ Change in Company Structure	___ Change in Educational Material
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__ Change in facility physical charachteristics/floor plan	___ Changes in vehicles
___ Change in PIC	___ Other - provide brief description:
X Change in Operating Plan: SOP, Storage, Security Plan, or Training	

Does this require additional permits? ___ Yes X No - Explain:

Summary of proposed change. *This statement will be read at the public licensing board meeting.*

Submit a Change Request Application. Please attach **ALL** information from the checklist that will be affected.

1) Date changes should go into affect. Provide timeline or phases if applicable. Timeline provided.
2) New/proposed address or facility contact information.
3) New building blueprint - Floor plan and cameras Floor plan provided.
4) SOPs/Protocols affected by the change in operating plan
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7) Submit new owner/Director background information - UDAF background authorization form, payment & fingerprints
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9) Updated bond
10) Educational material - Agent or pateint targeted
11) Any supporting documents for the change request

Drive-Through Procedure

Instructions: Drive-through Purchase: Procedure for patients purchasing through the drive-through.

1. Patient makes online reservation. They must choose Pickup (Drive-thru). Drive-through pick-up will be available during regular business hours. Business hours are Monday through Saturday 9 AM to 9 PM and Sunday 9AM to 7PM.

2. If the patient is new to Bloc Pharmacy, the agent will notify the pharmacist on duty.

a. The pharmacist will check the patient's recommendation and complete the patients profile if the patient has already completed a pharmacy consult.

b. If the patient is a first time cardholder requiring a pharmacy consult, the PMP on duty will call the patient and perform an over the phone consult or they will schedule a consult and cancel the order if it cannot be completed that day.

3. Staff receives online reservation and fills reservation as usual and product(s) placed in an opaque bag.

4. Once the order is fulfilled, it is stored behind the POS in the drive-thru order drawers.

5. Once the reservation/order is filled, patient/caregiver will receive a text message via Dutchie (online reservation platform).

6. When the order is ready the patient will pull through the drive-thru. The pharmacy agent will collect the patient's/caregiver's Utah Medical Marijuana card, state approved photo identification, and payment in full.

7. Patient may pay via Pay by Bank, debit card or a cash payment

8. Agent will verify the order with the patient then process the sale and print labels and receipts.

9. Receipt, any change due, MMJ card, state approved photo identification and products purchased contained in an opaque bag will be given to the patient.

10. Patients may pick up only the products ordered online. They may not add to the order. They may choose to not purchase product(s) in the order.

11. All online orders that are not picked up by the close of business are put back into inventory and stored in the vault.

MONITORING:

· Pharmacist-in-Charge (PIC), GM, AGM, and Supervisors will monitor employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP.

2. Instruct employee on corrective action.

Pharmacy Operation Change Request Form

Please limit change request form to one (1) request item and one (1) location. Please allow sufficient time for Department review and response. Additional information may be requested after submission. Ruling affiliated with chnages made to Pharmacy can be found in: 4-41a-103, 4-41a-108, 4-41a-1001, 4-41a-1002, 4-41a-1004, 4-41a-1101, 4-41a-1104, R66-5-3, R66-5-4, R66-5-5, R66-5-7, R66-5-8, R66-5-9, R66-5-10, R66-5-11, R66-5-15 & R66-5-22

Change Request Information

Cannabis Facility:

[redacted]

Change Request Details

Specify area of change

___ New owner/Director/Financial backing	___ Change in Operating Plan: SOP/ General
___ Change in Company Structure	___ Change in Educational Material
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___ Change in Location	___ Changes in electronic systems: ICS/POS/Security
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___ Change in PIC	___ Other - provide brief description:
X Change in Operating Plan: SOP, Storage, Security Plan, or Training	

Does this require additional permits? ___ Yes ___ No - Explain:

Summary of proposed change. This statement will be read at the public licensing board meeting.
Adding SOP for Suspected or Actual Criminal Activity.

Submit a Change Request Application. Please attach **ALL** information from the checklist that will be affected.

1) Date changes should go into affect. Provide timeline or phases if applicable.
2) New/proposed address or facility contact information.
3) New building blueprint - Floor plan and cameras
4) SOPs/Protocols affected by the change in operating plan
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9) Updated bond
10) Educational material - Agent or pateint targeted
11) Any supporting documents for the change request

Actual or Suspected Criminal Activity

PURPOSE: To protect the safety of patients and employees and to accurately document and report real or potential criminal acts.

SCOPE: This procedure applies to all JG Utah Security Guards and any JG Utah employees involved in the daily security of the pharmacy.

INSTRUCTIONS:

1. If actual or suspected criminal activity is identified, management should immediately document the concern and include:
    a. Date
    b. Time
    c. Location
    d. Description
2. Review security footage of the incident and preserve relevant actions.
3. Review relevant inventory/cash audit reports to verify discrepancies or irregularities.
4. HR will be notified as soon as concern is notified and will be kept informed throughout each stage of review and investigation.
5. All findings, including inventory records, video evidence, and any related documentation, will be properly stored, recorded, and maintained.
6. Management will work in coordination with HR and UDAF to determine appropriate next steps, which may include further investigation, disciplinary action, or notification of law enforcement if warranted.
7. All matters will be handled confidentially in accordance with company policy.

MONITORING:

- Upper management will monitor security guards and employees to ensure adherence to the outlined procedure.

CORRECTIVE ACTION:

1. Retrain any employee found not following the procedures in this SOP
2. Instruct employee on corrective action

GRAMA Claim of Business Confidentiality

Pursuant to Utah Code Section 63G-2-305(1) and (2), and in accordance with Section 63G-2-309, 127UT Dispensary, LLC / Zion Medicinal, LLC (company name) asserts a claim of business confidentiality to protect the following information submitted as part of a Request for Proposals.

- ☒ non-public financial statements
- ☒ specific employee name and contact information
- ☒ specific customer information, client lists, or subscription lists
- ☒ other (specify):

Trade Secrets

This claim is asserted because this information requires protection as it includes:

☒ trade secrets as defined in Utah Code Section 13-24-2 ("Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, or process, that: (a) derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and (b) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.)

☒ commercial information or non-individual financial information obtained from a person if: (a) disclosure of the information could reasonably be expected to result in unfair competitive injury to the person submitting the information or would impair the ability of the governmental entity to obtain necessary information in the future; [and] (b) the person submitting the information has a greater interest in prohibiting access than the public in obtaining access.

Following is a concise statement of reasons supporting the claim of business confidentiality:

127UT Dispensary / Zion Medicinal, LLC has developed novel and sensitive intellectual property and competitive business strategies that has enabled the company to excel in the marketplace. The company also relies heavily on its experienced key personnel to conduct market research, and production methodologies that are critical to the company's success. Disclosure of such trade secrets and commercial information would create unfair competition against the company that would result in devastating loss and damages to the company.

Signed: 

On behalf of (company): 127UT Dispensary, LLC / Zion Medicinal, LLC

Date: 06APR26

Utah Department of Agriculture and Food

4315 S 2700 W
Taylorsville,
UT 84129

cannabis@utah.gov
801-982-2375

Medical Cannabis Pharmacy Operating Plan Coversheet

In accordance with 26B-4-2, 4-41a and R66 a licensed Utah medical cannabis pharmacy must have an operating plan that describes how the pharmacy will comply with all applicable operating standards, statutes and administrative rules. **This document is not intended to be a full comprehensive list of all operating standards, statutes and administrative rules; it displays the minimum operating requirements for a facility.** Medical cannabis facilities must be familiar with and comply with all operating standards, statutes and administrative rules. Statues and administrative rules change frequently, verify you are using the most up to date form.

"Medical cannabis pharmacy" means a person that: acquires or intends to acquire medical cannabis from a cannabis processing facility or another medical cannabis pharmacy or a medical cannabis device; or possesses medical cannabis or a medical cannabis device; and sells or intends to sell medical cannabis or a medical cannabis device to a medical cannabis cardholder.

"Home delivery medical cannabis pharmacy" means a medical cannabis pharmacy that the department authorizes, as part of the pharmacy's license, to deliver medical cannabis shipments to a delivery address to fulfill electronic orders.

Application type

☑ Renewal ☐ Updated Submission/Change

Acknowledgements

The applicant understands that as an applicant and potential licensee you are REQUIRED to know the current statutory law, administrative rules and Departmental policies and comply in full? ☑ Yes ☐ No

The applicant understands that a license is not transferrable or assignable. ☑ Yes ☐ No

Medical Cannabis Pharmacy Operating Checklist

Please attach operating plan and page specification for required sections in a single PDF. All PDF uploads must be numbered sequentially to match the page numbers cited in this coversheet.

Business Documents & Information	Page(s) #
Business Name & DBA.	[redacted]
Physical Address & Mailing Address.	
Business contact information (phone & e-mail).	
Primary contact(s) for facility and information (position, phone, e-mail).	
Active business license from city.	
Proof of Performance bond/liquid cash account.	
Land use permit, proximity waiver or other supporting documents for the business location.	
A description of any investigation or adverse action taken by any licensing jurisdiction, government agency, law enforcement agency, or court in any state for any violation or detrimental conduct in relation to any of the applicant's cannabis-related operations or businesses. **If there is none for this business, please put N/A for the page number.**	
Organization Information	**Page(s) #**

The name and address of an individual who: (A) for a publicly traded company, has a financial or voting interest of 10% or greater in the proposed medical cannabis pharmacy; (B) for a privately held company, a financial or voting interest in the proposed medical cannabis pharmacy; or (C) has the power to direct or cause the management or control of a proposed medical cannabi pharmacy;	[redacted]
A description of the credentials and experience of: each officer, director, or owner of the proposed medical cannabis pharmacy; and any highly skilled or experienced prospective employee.	
Advertising standards (signage, website, etc.) and description of how business will comply with requirements.	
Educational events & handout material.	
Targeted marketing practice and description of how buiness with comply with requirements.	
Services offered by Pharmacy & cooresponding SOPs. (in store, walk up, drive thru, express pick up, delivery).	
Records that will be stored by the Pharmacy and plan to maintain for at least 5 years.	
Training standards for staff and responsibilities/duties that will be performed based on position type.	
Prodecure to ensure staff displays identification badge issued by the Department when on the facility premesis or while engaged in the transport of cannabis.	
Describe how the Pharmacy will maintain a list of active employees that have an Agent card an how they will provide that list to the Department upon request.	
Building & Security	**Page(s) #**
Business operating hours and hours open to public.	[redacted]
Description of the physical characteristics of the proposed facility, including a floor plan that shows access areas, room descriptions, and an architectural elevation.	
Detail the video surveillance system and coverage.	
Detailed security plan.	
Procedure to prevent medical cannabis from being consumed at pharmacy.	
Visitor policy and procedure.	
Procedure to report actual or suspected criminal activity.	
Inventory & Sales	**Page(s) #**
Transportation Procedure (between pharmacies, recalls/disposition back to processor, etc.).	[redacted]
Detail how the facility will handle: recalls, returns (pateint & processor/cultivation), waste, destruction and disposal.	
Procedure to ensure correct labeling on produict received by the Pharmacy, displayed in online store (if applicable), and being dispensed to a pateint.	
Detail storage protocols for all product.	
Description of the inventory control system and the interaction with the State electronic verification system.	
Detail inventory control procedures and procedure to mainatin accurate inventory and reporting of any discrepencies.	
Procedure to keep sales within the state or RMP dosage limit, standards for partial filling.	
Procedure to prohibit sale of expired, misbranded, adulterated, opened product.	
Plan to meet requirements related to the patient information insert. What options are planned to be provided for the patients?	
Procedure to verify pateint ID and active medical cannabis card. List procedure for all pick up types available at Pharmacy (in store, pick up, drive through, delivery).	

Procedure to protect confidential cardholder data from the EVS and ensure only authorized individuals have access.	[redacted]
Home Delivery (If Applicable)	**Page(s) #**
If the Medical Cannabis Pharmacy is categorized as Home Delivery, please complete this section. If the Pharmacy utilizes a courier service, move on to "Delivery Procedures" section and note "N/A" on coversheet. If Pharmacy does not participate in home delivery to patients in any capacity, disregard both sections and note "N/A"	[redacted]
Description of vehicles used and how security and storage procedures will be maintained during transport and at facility.	
Only deliver during 6am-10pm.	
Procedure to ensure medical cannabis is not left unattended in vehicle for more than one hour.	
Procedure to ensure the transport medical cannabis in a fully enclosed box, container, or cage, that is secured inside a delivery vehicle, and is held at an appropriate storage temperature throughout the delivery process to maintain the integrity of the product.	
Procedure to provide the department with information regarding any vehicle used for the delivery service, including the vehicle's make, model, color, vehicle identification number, and license plate number.	
Security plan that is specific for delivery that includes: a communication plan for couriers and dispatch/security team while enroute and clear procedures for handling of theft, security breaches or accidents.	
Procedure to ensure that no person other than a pharmacy agent or courier agent is in a delivery vehicle during delivery or during the time medical cannabis is in the vehicle.	
Delivery Procedures	**Page(s) #**
Procedure to ensure courier agent wears identification that clearly identifies them to a card holder.	[redacted]
Procedure for creating/mainiting manifest and ensuring no products are transported that do not appear on the manifest.	
Procedure for missing items/loss of product.	
Record keeping in ICS that ensures accountability for all products.	
Detail the system used to provide real time tracking.	
Policies for verifying the identity and validity of the individual receiving the medical cannabis to ensure the product is delivered to the correct medical cannabis cardholder or caregiver facility employee.	
Procedure to notify the home delivery medical cannabis pharmacy's supervising PMP within 24 hours of when the medical cannabis pharmacy agent first became aware of the missing product.	
Procedure to notify local law enforcement and the Department on any missing product.	
Procedure to log any missing products into the inventory control system.	
Procedure to return any undelivered product to the pharmacy.	
Procedure to ensure changes are not made to orders.	
Procedure to ensure cannabis is not consumed during delivery.	
Procedure to verify payment has been made upon delivery.	
Procedure to provide PMP contact info and hours of availability.	
Change Requests (Renewal Only)	**Page(s) #**
Attach all approved change requets from past year of license.	[redacted]

Certification and Acknowledgements

Applicant understands the requirements for licensure are based on current statute and rule and are subject to change. Applicant agrees as a condition of licensing that he has read and will abide by the provisions of Utah Code 4-41a and all rules promulgated thereunder and all directives of the Utah Department of Agriculture and Food. The applicant also understands that failure to adhere to or maintain the qualifications of their license, may result in suspension or revocation of the license and/or forfeiture of the performance bond or any other remedies allowed by law.

Applicant agrees to immediately notify the department of any change in ownership or financial interest of the facility; the facility's name, change in location, remodeling, expansion, reduction or physical, non-cosmetic alteration of the facility, change in written operating procedures, or change in any information submitted in this application.

The undersigned acknowledges that representatives of the Utah Department of Agriculture and Food may inspect the records and facility of a cannabis production establishment at any time during business hours to determine and ensure the cannabis production establishment is in compliance with the law. Failure to provide the department or the department's authorized agents immediate access to records and facilities during business hours in accordance with this section may result in a civil monetary penalty; license or registration suspension or revocation; or an immediate cessation of operations under a cease and desist order issued by the department.

Applicant acknowledges and understands that cultivating, possessing, using, distributing and/or selling marijuana is prohibited by federal law, notwithstanding Utah law or any authorizations in the Agent or this Registration to the contrary. Nothing in this application is intended to provide any guidance or assistance in violating or complying with existing federal laws regulating marijuana cultivation, distribution, or use. Similarly, compliance with state law or the terms of this registration, or possession of the registration card does not confer immunity from enforcement of federal law or federal enforcement practices. Further, nothing in this application or the registration card shall be construed as advice with regard to compliance with applicable federal, state, or local tax laws or any regulatory consequences of engaging in any business in this industry.

The undersigned acknowledges that they have read and understand the statements herein and the execution thereof is done voluntarily and by the authorization of the applicant entity.

The undersigned hereby makes application to the Utah Department of Agriculture and Food and certifies that the information contained herein and attached here is true and correct.

[redacted]

127 UT Dispensary, LLC

DBA: Zion Medicinal
301 S. Main St. Cedar City, UT 84720
435.708.1630 / info@zionmed.com

Medical Cannabis Pharmacy License Renewal

Submitted to the Utah Department of Agriculture and Food ("**Department**")

Pursuant to Utah Code 4-41a-1001, 4-41a-1003-4 and Utah Admin Code R66-5-4, a licensed Utah medical cannabis pharmacy shall have an operating plan that describes how the pharmacy will comply with all applicable operating standards, statutes, and administrative rules. This document is not intended to be a full comprehensive list of all operating standards, statutes, and administrative rules, but only a checklist used for internal purposes.



A description of the credentials and experience of: each officer, director, or owner of the proposed medical cannabis pharmacy; and any highly skilled or experienced prospective Employee.

[redacted]

Advertising Standards, Signage, Website, Educational Events, etc. [R66-5, 4-41a-109]: [redacted]

Educational Events & handout material [R66-7]: [redacted]

[redacted]

Targeted Marketing practice and description of how business with comply with requirements *[R66-5-11, 4-41a-102]*: [redacted]

Services Offered by Pharmacy & cooresponding SOPs (in store, curbside, delivery): [redacted]

Procedure - Check-in (including curbside) [4-41a-1103, R66-5-10]: [redacted]

[redacted]

[redacted]

Records that will be stored by the Pharmacy and plan to maintain for at least 5 years: [redacted]

[redacted]

Training standards for staff and responsibilities/duties that will be performed based on position type. *[R66-5-15]:* [redacted]

[redacted]

[redacted]

[redacted]

[redacted]

- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Procedure to ensure staff displays identification badge issued by the Department when on the facility premises or while engaged in the transport of cannabis [R66-5-15]: [redacted]

Describe how the Pharmacy will maintain a list of active employees that have an Agent card and how they will provide that list to the Department upon request: [redacted]

Building and Security

Business operating hours and hours open to public:

[redacted]

[redacted]

Description of the physical characteristics of the proposed facility, including a floor plan that shows access areas, room descriptions, and an architectural elevation:

[redacted]

- [redacted]
- [redacted]
- [redacted]

[redacted]



[redacted]

Detail the video surveillance system and coverage: [redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Procedure to prevent medical cannabis from being consumed at pharmacy *[4-41a-1101(7)]*: [redacted]

Visitor policy and procedure *[R66-5]:* [redacted]

Procedure to report actual or suspected criminal activity: [redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Transportation Procedure (between pharmacies, recalls/disposition back to processor, etc.): [redacted]

- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]

[redacted]

[redacted]

Detail how the facility will handle: recalls, returns (patient & processor/cultivation), waste, destruction and disposal:

[redacted]

[redacted]

Procedure to ensure correct labeling on product received by the Pharmacy, displayed in online store (if applicable), and being dispensed to a patient.

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]

[redacted]

- [redacted]
- [redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Procedure to keep sales within the state or RMP dosage limit, standards for partial filling. ***[4-41a-1102(2)]:*** [redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Plan to meet requirements related to the patient information insert. What options are planned to be provided for the patients? [redacted]

Procedure to verify patient ID and active medical cannabis card. List procedure for all pick up types available at Pharmacy (in store, pick up, drive through, delivery)*:*

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Procedure to protect confidential cardholder data from the EVS and ensure only authorized individuals have access*:* [redacted]

[redacted]

[redacted]

[redacted]

[redacted]



GRAMA Claim of Business Confidentiality

Pursuant to Utah Code Section 63G-2-305(1) and (2), and in accordance with Section 63G-2-309, Sapa Connect (company name) asserts a claim of business confidentiality to protect the following information submitted as part of a Request for Proposals.

- [X] non-public financial statements
- [X] specific employee name and contact information
- [X] specific customer information, client lists, or subscription lists
- [X] other (specify):

Intellectual property, SOPs & trade secrets, protected by law when applicable

This claim is asserted because this information requires protection as it includes:

[X] trade secrets as defined in Utah Code Section 13-24-2 ("Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, or process, that: (a) derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and (b) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.)

[X] commercial information or non-individual financial information obtained from a person if: (a) disclosure of the information could reasonably be expected to result in unfair competitive injury to the person submitting the information or would impair the ability of the governmental entity to obtain necessary information in the future; [and] (b) the person submitting the information has a greater interest in prohibiting access than the public in obtaining access.

Following is a concise statement of reasons supporting the claim of business confidentiality:

Document contains personal information, financial & ownership information, SOPs, IP, & training documentation for specific processes that are considered trade secrets, protected under applicable law.

Signed: _____

On behalf of (company): Sapa Connect

Date: 3.27.2026

Utah Department of Agriculture and Food

4315 S 2700 W
Taylorsville, UT
84129

cannabis@utah.gov
801-982-2375

Medical Cannabis Courier Operating Plan Coversheet

In accordance with 4-41a and R66 a licensed Utah medical cannabis courier must have an operating plan that describes how the courier will comply with all applicable operating standards, statutes and administrative rules. **This document is not intended to be a full comprehensive list of all operating standards, statutes and administrative rules; it displays the minimum operating requirements for a facility.** Medical cannabis facilities must be familiar with and comply with all operating standards, statutes and administrative rules. Statues and administrative rules change frequently, verify you are using the most up to date form.

"Medical cannabis courier" means a courier that: the department licenses in accordance with Section 4-41a-1201; and contracts with a home delivery medical cannabis pharmacy to deliver medical cannabis shipments to fulfill electronic orders.

Application Type

☐ New Application	☑ Renewal	☐ Updated Submission/Change

Acknowledgements

The applicant understands that as an applicant and potential licensee you are REQUIRED to know the current statutory law, administrative rules and Departmental policies and comply in full? ✓ Yes ___ No

The applicant understands that a license is not transferrable or assignable. ✓ Yes ___ No

Courier Operating Checklist

Please attach operating plan and page specification for required sections in a single PDF. All PDF uploads must be numbered sequentially to match the page numbers cited in this coversheet

Business Documents & Information	Page(s) #
Business name & DBA	5
Physical address & mailing address	5
Business contact information (Phone & e-mail)	5
Primary contact(s) for facility and information (position, phone, e-mail)	5
Organization Information	**Page(s) #**
Provide the name and address of an individual who: (A) has a financial or voting interest of 10% or greater in the proposed medical cannabis courier; or (B) has the power to direct or cause the management or control of a proposed cannabis production establishment;	5-6
a description of the credentials and experience of each officer, director, or owner of the proposed medical cannabis courier;	6-8
a description of the physical characteristics of any proposed facilities, including a floor plan and an architectural elevation, and delivery vehicles;	8
Provide the medical cannabis courier's employee training standards;	8-12
Only deliver during 6am-10pm.	12
Provide Pharmacy(s) that the courier service works with, include areas of delivery and availability/route scheduling.	12-13
Describe how the Courier will maintain a list of active employees that have an Agent card and how they will provide that list to the Department upon request.	13-14
Security, Inventory & Storage	**Page(s) #**

Provide storage and delivery protocols, both short and long term, to ensure that medical cannabis shipments are stored and delivered in a manner that is sanitary and preserves the integrity of the cannabis.	14-15
Procedure for storage of product up to 10 days at courier.	15
Description of vehicles used and how security and storage procedures will be maintained during transport and at facility.	15-16
Procedure to ensure medical cannabis is not left unattended in vehicle for more than one hour.	16
Procedure to ensure the transport medical cannabis in a fully enclosed box, container, or cage, that is secured inside a delivery vehicle, and is held at an appropriate storage temperature throughout the delivery process to maintain the integrity of the product.	16-17
Procedure to provide the department with information regarding any vehicle used for the delivery service, including the vehicle's make, model, color, vehicle identification number, and license plate number.	17
Security plan that is specific for delivery that includes: a communication plan for couriers and dispatch/security team while enroute and clear procedures for handling of theft, security breaches or accidents.	17-18
Procedure to ensure that no person other than a pharmacy agent or courier agent is in a delivery vehicle during delivery or during the time medical cannabis is in the vehicle.	18
Delivery & Sales	**Page(s) #**
Procedure to ensure courier agent wears identification that clearly identifies them to a card holder.	18
Procedure for creating/mainiting manifest and ensuring no products are transported that do not appear on the manifest.	18-21
Procedure for missing items/loss of product.	21
Record keeping in ICS that ensures accountability for all products.	22
Detail the system used to provide real time tracking.	22
Policies for verifying the identity and validity of the individual receiving the medical cannabis to ensure the product is delivered to the correct medical cannabis cardholder or caregiver facility employee.	22-23
Procedure to notify the home delivery medical cannabis pharmacy's supervising PMP within 24 hours of when the medical cannabis pharmacy agent first became aware of the missing product;	23
Procedure to notify local law enforcement and the Department on any missing product	23
Procedure to log any missing products into the inventory control system.	23-24
Procedure to return any undelivered product to the pharmacy	24
Procedure to ensure changes are not made to orders	24
Procedure to ensure cannabis is not consumed during delivery	24
Procedure to verify payment has been made upon delivery.	24
Procedure to provide PMP contact info and hours of availability.	25
Change Requests (Renewal Applications Only)	
Attach all approved change requests from past year of license.	N/A

Certification and Acknowledgments

Applicant understands the requirements for licensure are based on current statute and rule and are subject to change. Applicant agrees as a condition of licensing that he has read and will abide by the provisions of Utah Code 4-41a and all rules promulgated thereunder and all directives of the Utah Department of Agriculture and Food. The applicant also understands that failure to adhere to or maintain the qualifications of their license, may result in suspension or revocation of the license and/or forfeiture of the performance bond or any other remedies allowed by law.

Applicant agrees to immediately notify the department of any change in ownership or financial interest of the facility; the facility's name, change in location, remodeling, expansion, reduction or physical, non-cosmetic alteration of the facility, change in written operating procedures, or change in any information submitted in this application.

The undersigned acknowledges that representatives of the Utah Department of Agriculture and Food may inspect the records and facility of a cannabis production establishment at any time during business hours to determine and ensure the cannabis production establishment is in compliance with the law. Failure to provide the department or the department's authorized agents immediate access to records and facilities during business hours in accordance with this section may result in a civil monetary penalty; license or registration suspension or revocation; or an immediate cessation of operations under a cease and desist order issued by the department.

Applicant acknowledges and understands that cultivating, possessing, using, distributing and/or selling marijuana is prohibited by federal law, notwithstanding Utah law or any authorizations in the Agent or this Registration to the contrary. Nothing in this Application is intended to provide any guidance or assistance in violating or complying with existing federal laws regulating marijuana cultivation, distribution, or use. Similarly, compliance with state law or the terms of this Registration, or possession of the registration card does not confer immunity from enforcement of federal law or federal enforcement practices. Further, nothing in this Application or the Registration Card shall be construed as advice with regard to compliance with applicable federal, state, or local tax laws or any regulatory consequences of engaging in any business in this industry.

The undersigned acknowledges that they have read and understand the statements herein and the execution thereof is done voluntarily and by the authorization of the applicant entity.

The undersigned hereby makes application to the Utah Department of Agriculture and Food and certifies that the information contained herein and attached here is true and correct.

Name:	Elizabeth Ferrell		
Signature:		**Date:**	3.11.20
For UDAF Office Use Only			
Date Received:		Date Approved:	
Compliance Officer:			

2026 Sapa Connect

Operating Plan

Business Documents & Information

1. **Business name & DBA**
    a. Business Name:
        i.
    b. DBA:
        i. Sapa Connect

2. **Physical address & mailing address**
    a. Physical Address:
        i.
    b. Mailing Address:
        i.

3. **Business contact information (Phone & e-mail)**
    a.

4. **Primary contact(s) for facility and information (position, phone, e-mail)**
    a.

    b.

Organization Information

5. **Provide the name and address of an individual who: (A)has a financial or voting interest of 10% or greater in the proposed medical cannabis courier; or (B)has the power to direct or cause the management or control of a proposed cannabis production establishment;**
    a.

f.

6. **A description of the credentials and experience of each officer, director, or owner of the proposed medical cannabis courier;**
    a.

7. **A description of the physical characteristics of any proposed facilities, including a floor plan and an architectural elevation, and delivery vehicles;**
    a.

8. **Provide the medical cannabis courier's employee training standards;**
    a.

9. **Only deliver during 6am-10pm.**
    a.

10. **Provide Pharmacy(s) that the courier service works with, include areas of delivery and availability/route scheduling.**
    a.

11. **Describe how the Courier will maintain a list of active employees that have an Agent card and how they will provide that list to the Department upon request.**
    a.

Security, Inventory & Storage

12. **Provide storage and delivery protocols, both short and long term, to ensure that medical cannabis shipments are stored and delivered in a manner that is sanitary and preserves the integrity of the cannabis.**
    a.

13. Procedure for storage of product up to 10 days at courier.

a.

14. Description of vehicles used and how security and storage procedures will be maintained during transport and at facility.

a.

15. **Procedure to ensure medical cannabis is not left unattended in a vehicle for more than one hour.**
    a.

16. **Procedure to ensure the transport of medical cannabis in a fully enclosed box, container, or cage, that is secured inside a delivery vehicle, and is held at an appropriate storage temperature throughout the delivery process to maintain the integrity of the product.**
    a.

17. **Procedure to provide the department with information regarding any vehicle used for the delivery service, including the vehicle's make, model, color, vehicle identification number, and license plate number.**
    a.

18. **Security plan that is specific for delivery that includes: a communication plan for couriers and dispatch/security team while enroute and clear procedures for handling of theft, security breaches or accidents.**

a.

19. **Procedure to ensure that no person other than a pharmacy agent or courier agent is in a delivery vehicle during delivery or during the time medical cannabis is in the vehicle.**
    a.

Delivery & Sales

20. **Procedure to ensure courier agent wears identification that clearly identifies them to a card holder.**
    a.

21. **Procedure for creating/maintaining manifest and ensuring no products are transported that do not appear on the manifest.**
    a.

    b.

22. Procedure for missing items/loss of product.

a.

23. Record keeping in ICS that ensures accountability for all products.

a.

24. Detail the system used to provide real time tracking.

a.

25. Policies for verifying the identity and validity of the individual receiving the medical cannabis to ensure the product is delivered to the correct medical cannabis cardholder or caregiver facility employee.

a.

26. Procedure to notify the courier medical cannabis pharmacy's supervising PMP within 24 hours of when the medical cannabis pharmacy agent first became aware of the missing product;

a.

27. Procedure to notify local law enforcement and the Department on any missing product.

a.

28. Procedure to log any missing products into the inventory control system.

a.

29. Procedure to return any undelivered product to the pharmacy.

a.

30. Procedure to ensure changes are not made to orders.

a.

31. Procedure to ensure cannabis is not consumed during delivery.

a.

32. Procedure to verify payment has been made upon delivery.

a.

33. Procedure to provide PMP contact info and hours of availability.

a.

b.

Change Requests (Renewal Applications Only)

34. Attach all approved change requests from past year of license.

GRAMA Claim of Business Confidentiality

Pursuant to Utah Code Section 63G-2-305(1) and (2), and in accordance with Section 63G-2-309, Gold Naturals, Origins asserts a claim of business confidentiality to protect the following information submitted as part of a Request for Proposals.

- ☑ non-public financial statements
- ☑ specific employee name and contact information
- ☑ specific customer information, client lists, or subscription lists
- ☑ other (specify):

This claim is asserted because this information requires protection as it includes:

☑ trade secrets as defined in Utah Code Section 13-24-2 ("Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, or process, that: (a) derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and (b) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.)

☑ commercial information or non-individual financial information obtained from a person if: (a) disclosure of the information could reasonably be expected to result in unfair competitive injury to the person submitting the information or would impair the ability of the governmental entity to obtain necessary information in the future; [and] (b) the person submitting the information has a greater interest in prohibiting access than the public in obtaining access.

Following is a concise statement of reasons supporting the claim of business confidentiality:

Gold Naturals, Origins asserts that the submitted information constitutes trade secrets and proprietary business data whose disclosure would harm the company's competitive position. Release of this information would provide competitors with an unfair advantage, damage confidential relationships with customers and employees, and cause direct financial harm to the business. The company's interest in restricting access to this information outweighs the public's interest in obtaining it.

Signed: _____

On behalf of (company): Gold Naturals, Origins

Date: April 6, 2026

PRODUCTION FACILITY APPLICATION
UTAH DEPARTMENT OF AGRICULTURE AND FOOD

Application Type	New Tier 1 Processor

General Information

The Application submitted by a Cannabis Production Establishment and approved by the Establishment Board will be considered the business's operation plan. UDAF Inspectors will use the operation plan for regulatory purposes. Ensure all information is complete, current, and accurate.

The information provided by the applicant for a Medical Cannabis Production Establishment must fit within the following Guidelines:
Information provided must be clear and concise; do not repeat information
Ensure each section speaks to the requested information and appear in the same order as application

Application Date	03/16/2026
Legal Status	Limited Liability Company

Medical Cannabis Processor Facility is multi-tiered:
(a) A tier 1 processor license allows the licensee process, manufacture, dry, cure, package, and label cannabis and cannabis products for sale or transfer to another cannabis processing facility, a medical cannabis pharmacy, or the state central fill medical cannabis pharmacy. A tier 1 processing license is $90,000 per year.
(b) A tier 2 processor license allows the licensee to package and label cannabis and cannabis products for sale or transfer to another cannabis processing facility or a medical cannabis pharmacy. A tier 2 processing license is $35,000 per year. Prior to approving an application, the department may contact any applicant and request additional supporting documentation or information. The department may conduct face-to-face interviews with an applicant if needed. The department shall inspect the premises to determine if the applicant complies with state laws, administrative rules and best practice standards

New application types must pay a non-refundable application fee of $1,250.00 before the application is reviewed.

Other industrial hemp and/or medical cannabis licenses currently or previously held by applicant/entity/principals: Gold Naturals Hemp Processor 8002-20252, Retail 8003-000002704

Ownership and Contact Information

Ownership Entity	Gold Naturals		
Business Contact:			
Name	[redacted]		
Business Phone	[redacted]	**Fax**	
Other Phone		**Email**	[redacted]

Facility Manager Contact:		
Name [redacted]	**Phone** [redacted]	**Email** [redacted]

Contact Person for Inspection:		
Name [redacted]	**Phone** [redacted]	**Email** [redacted]

Contact Person for Sampling/Results:		
Name [redacted]	**Phone** [redacted]	**Email** [redacted]

DBA

Facility Address

Street	758 Automall Drive Dr #11		
City	American Fork	**State**	Utah
Country	United States	**Zip**	84003

Mailing Address

Street	758 Automall Drive Dr #11		
City	American Fork	**State**	Utah
Country	United States	**Zip**	84003

Application Locations

,

*An owner is a person who, if the company is privately held, has a financial or voting interest of **2%** or greater in the cannabis production establishment; or if the entity is publicly traded has more than a **2%** financial interest in the company; or is an individual who has the power to direct or cause the management or control of a facility, in other words is a general manager of daily operations.*

List all Owners and their positions in the Company

Legal Name	Address	Role in Companies Finances or Decisions	Date of Birth	Listed on Initial Application
[redacted]	[redacted]	CEO	[redacted]	☐Yes ☐No

[redacted]	[redacted]	Board	[redacted]	☐Yes ☐No

Upload descriptions of the credentials and experience of each officer, director, and owner and prospective employee who have a financial or voting interest of 2% or greater in the proposed cannabis production establishment; or the power to direct or cause the management or control of a proposed cannabis production establishment: A. Include a description of any investigation or adverse action taken by any licensing jurisdiction, government agency, law enforcement agency, or court in any state for any violation or detrimental conduct in relation to any of the applicant's cannabis-related operations or businesses.

I acknowledge that as an applicant and potential licensee, I am required to know the current law, administrative rules, and department policies, and comply to them in full. ☑

Property Information

Days and Hours of Operation
M-F 9-5

Expected Opening Day	04/20/2026

Days Open for Business (Projected)
250

Community Location and Residential Zone Proximity
Medical cannabis production establishments are not permitted to be within 1,000 feet by pedestrian travel of a "community location". Establishments are also not permitted within 600 feet by pedestrian travel to any district zoned as primarily residential. "Community location" means a public or private elementary or secondary school, a church, a public library, a public playground, or a public park.
Does your proposed location meet these requirements?

☑Yes ☐No

All information in this section must follow specific requirements as outlined in Utah Administrative Rule: Cannabis Cultivation (R66-1), Cannabis Processing (R66-2), Quality Assurance Testing on Cannabis (R66-3), and/or Independent Cannabis Testing Laboratory (R66-4) as applicable to the license type you are seeking.
Please upload the establishment's current facility blueprint with:
a) the square footage of the areas where cannabis is extracted;
b) the square footage of the area(s) where cannabis products are manufactured;
c) location of all extraction machinery/ stationary equipment;
d) the square footage of the areas used for storage and what type of product is stored there (i.e crude oil, untested products, final tested product) ;
e) the areas where cannabis is to be dried, trimmed, and cured (if applicable);
f) the square footage of the areas where cannabis is to be packaged;
g) the location of the toilet facilities and hand washing facilities;
h) the location of a break room;
i) the location of lobby or area where non-agents can access;
j) the location of the areas to be used for loading and unloading of cannabis products for transportation; and k) the location of all cameras and external lights.

Operating Plan

Submit the proposed cannabis facility's most up-to-date security plan. Security plans shall include: a) Description of security alarm system
b) Person(s) notified of potential security breaches and alerts
c) Video storage device location: local or cloud storage
d) Procedures to provide UDAF inspectors immediate access to current and archived video footage when requested e) Any additional security measure in place that exceed the security requirements
f) Visitor Policy
g) Description of backup power source and SOP for power outage.

Attached

Describe the proposed cannabis facility's Inventory Control System (ICS) and detail the procedures the facility will employ to meet the ICS requirements of Utah Code 4-41a-103 and Utah Administrative Rule related to inventory control. Include a description of how the facility will comply with section 4-41a-2 and use the state Electronic Verification System to track facility agents.

Attached

Provide the proposed cannabis facility storage protocols, both short and long-term, to ensure all cannabis is stored in a manner that is sanitary and preserves the integrity of the cannabis.

Attached

Provide all written emergency procedures to be followed in case of fire, chemical spill and other emergencies at the cannabis facility. This information plus the Material Safety Data Sheet (MSDS) must be easily accessed by all employees. Attached

Provide the proposed cannabis facility's waste disposal plan. Explain how the facility will comply with Utah Code 4-41a-405 and Utah Administrative Rule related to waste disposal.

Attached

Detail the procedures the cannabis facility will employ to meet the transport and transfer requirements of Utah Code 4-41a-404 Medical cannabis transportation. Include the cannabis facility's sample transport and transfer plan in accordance with all applicable Utah Administrative Rules regarding the transportation of medical cannabis. ☑ Attached

Yes No

Does the licensee complete Research and Development

Attach all Standard Operating Procedures

☑ Attached

Yes No

Does this facility process or store hemp?

Attach Standard Operating Procedure for hemp is stored and blueprint outlining the separation between hemp and cannabis

Attached

List of equipment

Attached

Provide procedure for the use of cannabinoid isolate, outlined R66-2-7(5).

Attached

List all product types that will be produced in the upcoming year. (e.g., Concentrate, Flower, Infused Edible) Cartridges / Pens Concentrate

Flower Infused Edible

Infused Non-edible

Attach Standard Operating Procedures for each product produced. In each SOP, please include quality control procedures for each product

Attached

List all extraction methods used at the facility. Include all solvents, chemicals, and equipment used. Ethanol CO2

Hydrocarbon Solventless

Other

Other Extraction Methods Used
None

Attach Standard Operating Procedures for each extraction method

Attached

Is the facility doing CBD to THC conversion?

Yes No

Provide the processing facility's written plan and procedures to handle potential recalls in accordance with R66-2-15. Include:
a) The name(s) of person(s) designated as recall coordinator(s);
b) Contact information for the designated recall coordinator(s);
c) How affected parties will be notified; and
d) A written procedure with specifics of what to do in case of a product recall.

Attached

Provide facility's plan for remediation.

Attached

Submit the facility's plan and procedure to dispose of product that fails quality assurance testing. A destruction plan must be written for every product type produced at the facility and must comply with federal laws, Utah Code 4-41a-405, and Administrative Rule R66-2-17.

Attached

Provide outline to meet requirement 21 CFR 111, "Current Good Manufacturing, Packaging, Labeling, or Holding Operation for Dietary Supplements.

Attached

Compliance

Submit proof of a performance bond issued by a surety business, or proof of a liquid cash account in the required amount with a financial institution: Each Cultivation Facility $100,000; each Tier 1 and Tier 2 Processing Facility and Testing Lab $50,000.

Attached

All scales must be certified as outlined in Utah Administrative Rule 66-2-4 (8) and 66-2-4 (4). Visit the Weights and Measures Program for more information about how to certify scales.

Attached

Upload a copy of the current local business license or a letter from the city/municipality stating their intent to issue a business license once the facility is licensed as a Medical Cannabis Production Establishment.

Attached

Submit the names of all agents currently working at the company's processing facility. All agents listed must: a) be in the process of applying for an agent card in the EVS; or b) have an agent card and have an account in the EVS. The Facility is responsible for ensuring all employees have background checks and are registered in the EVS. The company is also responsible for collecting agent cards and notifying the Department when an agent leaves their facility. Failure to comply will result in a citation and a fine to the company.

Attached

Attached

Provide the proposed medical cannabis processing facility's employee training standards.

Provide the facility's plan and procedures to have a representative sample of cannabis products tested by an independent testing laboratory to determine if the product is safe for human consumption.

Attached

Attached

Submit proof of registration as a Manufactured Food Establishment with UDAF's Regulatory Services.

Provide a description of any investigation or adverse action taken by any licensing jurisdiction, government agency, law enforcement agency, or court in any state for any violation or detrimental conduct in relation to any of the applicant's Attached **cannabis-related operations or businesses.**

Applicant understands the requirements for licensure are based on current statute and rule and are subject to change. Applicant agrees as a condition of licensing that he has read and will abide by the provisions of Utah Code 4-41a and all rules promulgated thereunder and all directives of the Utah Department of Agriculture and Food. The applicant also understands that failure to adhere to or maintain the qualifications of their license, may result in suspension or revocation of the license and/or forfeiture of the performance bond or any other remedies allowed by law.

Applicant agrees to immediately notify the department of any change in ownership or financial interest of the facility; the facility's name, change in location, change in testing methods, equipment, remodeling, expansion, reduction or physical, non-cosmetic alteration of the facility, change in written operating procedures, or change in any information submitted in this application. The undersigned acknowledges that representatives of the Utah Department of Agriculture and Food may inspect the records and facility of a cannabis production establishment at any time during business hours to determine and ensure the cannabis production establishment is in compliance with the law. Failure to provide the department or the department's authorized agents immediate access to records and facilities during business hours in accordance with this section may result in a civil monetary penalty; license or registration suspension or revocation; or an immediate cessation of operations under a cease and desist order issued by the department.

Applicant acknowledges and understands that cultivating, possessing, using, distributing and/or selling marijuana is prohibited by federal law, notwithstanding Utah law or any authorizations in the Agent or this Registration to the contrary. Nothing in this Application is intended to provide any guidance or assistance in violating or complying with existing federal laws regulating marijuana cultivation, distribution, or use. Similarly, compliance with state law or the terms of this Registration, or possession of the registration card does not confer immunity from enforcement of federal law or federal enforcement practices. Further, nothing in this Application or the Registration Card shall be construed as advice with regard to compliance with applicable federal, state, or local tax laws or any regulatory consequences of engaging in any business in this industry.

The undersigned acknowledges that he/she has read and understands the statements herein and the execution thereof is done voluntarily and by the authorization of the applicant entity.

The undersigned hereby makes application to the Utah Department of Agriculture and Food and certifies that the information contained herein and attached here is true and correct. If selected for a license, applicant agrees to pay the required license fee ($100,000 Tier 1 or $35,000 Tier 2) within 30 days of being notified of licensure decision.

Applicant/Owner of Business:	Jacob Jones
Title/Position:	CEO
Applicant Signature	
Date	03/17/2026

ZONING CLEARANCE FORM

Development Services | 275 E 200 N, American Fork, UT 84003

March 3, 2026

[redacted]

The Development Services Department of American Fork City has provided the following information for your request of a Zoning Clearance on the property located in the area of **758 S Auto Mall Drive Unit #11, American Fork, UT 84003:**

- **Parcel ID:**
  - 47:327:0011

- **Current Zoning of Subject Property:**
  - Planned Industrial Zone (PI-1) – Section 17.4.502 PI-1 and PI-1(O) Planned Industrial Zone.

- **Review/Approval Process:**
  - **BUILDING DEPARTMENT PROCESS.** You can begin your process by submitting your project to the portal by going to the Building Department page at americanfork.gov. You will click on the link that states, "CLICK HERE TO SUBMIT AND MANAGE YOUR BULDING PROJECT ONLINE."

- **Classification of New Use:**
  - Permitted. The Research and Manufacturing of Medical Cannabis will be assessed under Section 17.7.701 (B)(1)(b) of the American Fork City Municipal Code and is subject to the provisions of Section 17.7.701 Planned Industrial Parks.

All information presented above is known to be current, to the best of the department's knowledge, here in the Development Services Department at American Fork City, UT 84003. Please note that if a use is not listed within the "Permitted Uses within the Zoning District" section, then it is **not** a permitted use within the zoning district.

Kindest Regards,

Cody Opperman – Planner II
Planning and Zoning Division
Development Services Department
American Fork City

Cody Opperman

Map of Current Zoning on Subject Property:

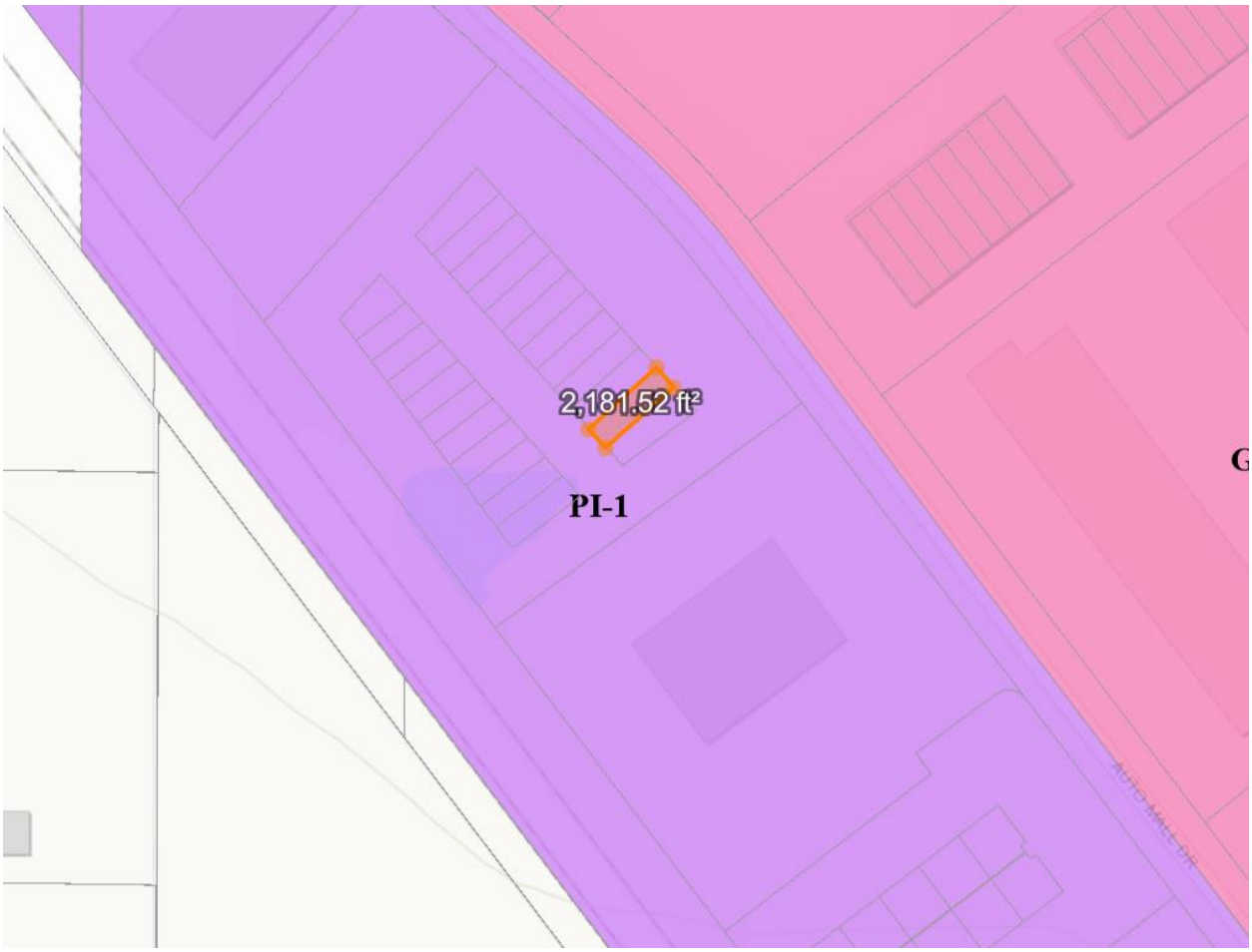


Figure 1: Parcel ID: 47:327:0011 in the PI-1 Zoning.

Regulatory Action Disclosure and Status Declaration

Facility: Origins Processing Facility

Address: 758 Automall Dr. Suite 11, American Fork, Utah 84003

Prepared By [redacted]

This statement is provided in response to the requirement to disclose any investigation or adverse action taken by any licensing jurisdiction, government agency, law enforcement agency, or court in any state for violations or detrimental conduct related to cannabis operations or businesses.

[redacted]

[redacted]

Signatu[redacted]

Nam[redacted]

[redacted]

Prior Regulatory Action Disclosure

Facility: Origins Processing Facility

Address: 758 Automall Dr. Suite 11, American Fork, Utah 84003

Prepared By: [redacted]

This disclosure is provided in response to the application requirement to report any investigation or adverse action taken by a licensing jurisdiction, government agency, law enforcement agency, or court related to cannabis or cannabinoid operations.

[redacted]

Fee for Duplicate Certificate: $15.00

Important Registration Reminders

Your registration is valid until the expiration date listed on this certificate. Approximately 60 days prior to this expiration you will receive a renewal notice.
Listed below are your current mailing and location addresses of record with the division. If you move, it is your responsibility to notify us of any change. To make any address change, please log in at ag.utah.gov/online services.

GOLDEN NATURALS DBA BLANC LABS
758 AUTOMALL DR # 11
AMERICAN FORK UT 84043

If you have any questions please visit our web site:

http://ag.utah.gov/licensing.html

Mail: Department of Agriculture and Food
4315 S 2700 W
TSOB South Bldg, Floor 2
Taylorsville, UT 84129-2128

Phone: (801) 982-2253 Food Compliance Program
Fax: (385) 465-6023

Year: 2026 **Certificate No: 191246**

CERTIFICATE OF REGISTRATION FOR

Food Establishment

GOLDEN NATURALS DBA BLANC LABS
758 AUTOMALL DR # 11
AMERICAN FORK UT 84043

Registration Expires: 12/31/2026

Category: LARGE

GRAMA Claim of Business Confidentiality

Pursuant to Utah Code Section 63G-2-305(1) and (2), and in accordance with Section 63G-2-309, Gold Naturals, Origins asserts a claim of business confidentiality to protect the following information submitted as part of a Request for Proposals.

- ☑ non-public financial statements
- ☑ specific employee name and contact information
- ☑ specific customer information, client lists, or subscription lists
- ☑ other (specify):

This claim is asserted because this information requires protection as it includes:

☑ trade secrets as defined in Utah Code Section 13-24-2 ("Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, or process, that: (a) derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and (b) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.)

☑ commercial information or non-individual financial information obtained from a person if: (a) disclosure of the information could reasonably be expected to result in unfair competitive injury to the person submitting the information or would impair the ability of the governmental entity to obtain necessary information in the future; [and] (b) the person submitting the information has a greater interest in prohibiting access than the public in obtaining access.

Following is a concise statement of reasons supporting the claim of business confidentiality:

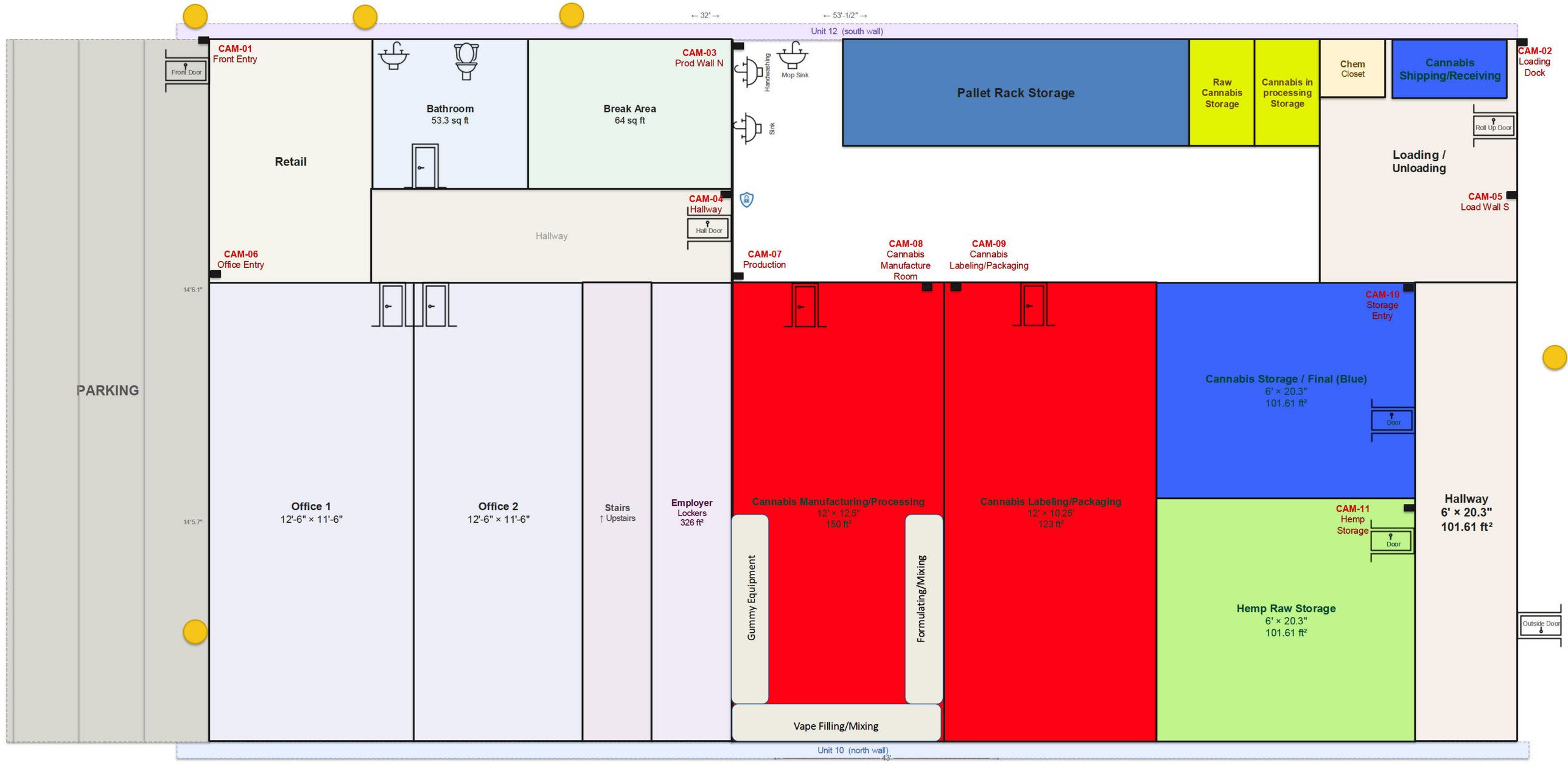
Gold Naturals, Origins asserts that the submitted information constitutes trade secrets and proprietary business data whose disclosure would harm the company's competitive position. Release of this information would provide competitors with an unfair advantage, damage confidential relationships with customers and employees, and cause direct financial harm to the business. The company's interest in restricting access to this information outweighs the public's interest in obtaining it.

Signed: [redacted]

On behalf of (company): Gold Naturals, Origins

Date: April 6, 2026

758 Automall Dr #11 — Ground Floor



LEGEND KEY

- Hemp Zones — Origins Green
- Cannabis Production/Processing
- Cannabis Storage Final, Shipping/ Receiving! (Blue)
- Bathroom / Utility
- Office / Staff Areas
- Exterior Light
- Security Camera
- Door / Entry Point
- Parking Area
- HEMP / CANNABIS Separation Wall
- Chem Closet
- Secure Access Lock
- CAM Camera Label (CAM-##)

758 Automall Dr #11 — Upstairs

Office / Hemp Final Storage / Shipping · Same 85.5' × 43' footprint

CAM-12
Hemp Final
Storage

CAM-13
Hemp Final
Production

Hemp
Packaging/Labeling

Hemp Final Storage
Finished product / ready to ship

Stairs
↓ Downstairs

Hemp Shipping
Packing / dispatch / staging

CAM-14
Hemp Final
Storage

43'

UPPER LEVEL — Hemp Only
Hemp Packaging/Labeling | Hemp Final Storage | Hemp Shipping
CAM-12 ● CAM-13 ● CAM-14

GROUND FLOOR — Cannabis Processing | Hemp Separation Zone
Retail/Lobby | Bathroom | Break Room | Lockers | Office 1 & 2 | Cannabis Mfg/Processing | Cannabis Labeling/Packaging | Cannabis Final Storage | Raw Cannabis Storage | Cannabis In-Process Storage | Hemp Raw Storage | Cannabis Transport Loading/Unloading | Pallet Rack Storage | Chem Closet
CAM-1 (Exterior Front Entry) ● CAM-2 (Exterior Loading Dock) ● CAM-3 (Production Wall S) ● CAM-4 (Hall Entry) ● CAM-5 (Loading) ● CAM-6 (Office Entry) ● CAM-7 (Production) ● CAM-8 (Cannabis Manufacturing) ● CAM-9 (Cannabis Labeling/Packaging) ● CAM-10 (Cannabis Final Storage) ● CAM-11 (Hemp Raw Storage)

ENTRY POINTS & EXTERIOR: [FRONT DOOR — East facade, left side] [ROLL-UP LOADING DOOR — West facade, right side] [OUTSIDE DOOR — West facade, back hallway]
EXTERIOR LIGHTS: ☀ Light-1 (East/left) ☀ Light-2 (East/center-left) ☀ Light-3 (South/center-right) ☀ Light-4 (West side)
EXTERIOR CAMERAS: ◉ CAM-1 (Exterior Entry/East) ◉ CAM-2 (Exterior Exit Dock/West) | Building Dimensions: ~85.5’ wide × ~43’ deep × 2 stories

Origins Cannabis Processing Facility

Equipment List

General Facility Equipment

[redacted]

[redacted]

Extraction Operations Statement

The cannabis processing facility operated by Origins does not currently perform any cannabis extraction activities. The facility will only receive cannabis concentrates or cannabis oil from licensed Utah cannabis cultivators or processors that are authorized to perform extraction operations.

All incoming cannabis materials and cannabis products will be tracked using the State of Utah seed-to-sale tracking system (EVS) in accordance with Utah Code 4-41a and applicable Utah Administrative Rules.

The facility will utilize received cannabis oil or concentrates solely for manufacturing finished cannabis products including vape cartridges, tinctures, capsules, gummies, topicals, and packaged cannabis flower. All manufacturing activities will follow the facility's approved Standard Operating Procedures (SOPs) and Master Batch Records (MBRs).

If the facility elects to implement cannabis extraction processes in the future, the company will submit updated Standard Operating Procedures, safety protocols, equipment specifications, and facility modifications to the Utah Department of Agriculture and Food for review and approval prior to initiating extraction operations.

Origins Processing Facility – Operating Plan Summary

Facility Address: 758 Automall Dr. Suite 11, American Fork, Utah 84003

Prepared By: [redacted]

Phone: [redacted]

Email: [redacted]

Overview

This document summarizes the operational policies, procedures, and compliance plans for the Origins medical cannabis processing facility. Detailed Standard Operating Procedures (SOPs) referenced in this document are maintained as part of the facility's quality management system and are available for review.

Security Plan

Facility utilizes monitored alarm systems, surveillance cameras, access control, and secure storage areas.

Video recordings are retained for a minimum of 90 days.

Visitors are logged and escorted at all times.

Inventory Control System

All cannabis material and finished products are tracked using the METRC seed-to-sale system.

Inventory reconciliation and batch tracking procedures are documented in the Inventory Control SOP.

Storage Protocols

Cannabis and cannabis products are stored in sanitary, secure, and climate-controlled conditions.

Separate storage areas are maintained for quarantined, approved, and waste materials.

Remediation Plan

Products failing testing are quarantined and evaluated by Quality Assurance.

If allowed, products may be remediated through reformulation or further processing.

Remediated products must pass laboratory testing prior to release.

Product Recall Plan

A designated Recall Coordinator manages recall activities.

Affected dispensaries and regulators are notified within required timelines.

All recalled products are quarantined and tracked through METRC.

Product Destruction Plan

Products that fail quality testing and cannot be remediated are destroyed.

Destruction follows Utah Code 4-41a-405 and Rule R66-2-17.

Two authorized employees witness destruction and records are maintained.

GMP Compliance (21 CFR 111)

The facility follows current Good Manufacturing Practices including sanitation controls, batch records,

quality assurance oversight, equipment maintenance, and laboratory testing procedures.

Recordkeeping

All production, testing, inventory, destruction, and distribution records are maintained for a minimum of five years and are available for inspection by regulatory authorities.

Scale Certification Compliance Statement

Facility: Origins Processing Facility

Address: 758 Automall Dr. Suite 11, American Fork, Utah 84003

Prepared By: [redacted]

This statement is provided in response to the application requirement that all weighing devices used in a medical cannabis processing facility be certified in accordance with Utah Administrative Rule R66-2-4(4) and R66-2-4(8).

Origins Processing Facility currently has a valid, registered commercial scale on-site at 758 Automall Dr. Suite 11, American Fork, Utah 84003. The scale is registered under Gold Naturals and meets the requirements of the National Type Evaluation Program (NTEP) standards as required for cannabis manufacturing, batching, packaging, and inventory control.

The scale has been inspected and certified in accordance with Utah Administrative Rule R66-2-4(4) and R66-2-4(8) by the Utah Department of Agriculture and Food Weights and Measures Program.

Documentation of scale registration, certification, and inspection is maintained on-site at the facility and is available to the Utah Department of Agriculture and Food upon request.

[redacted]

Name: [redacted]

Title: Owner / Operations Manager

Date: _____

Processing Facility Agent List

Facility: Origins Processing Facility

Address: 758 Automall Dr. Suite 11, American Fork, Utah 84003

Prepared By: [redacted]

All agents listed below are employees of the processing facility and are either in the process of applying for a Medical Cannabis Production Establishment Agent Card through the Electronic Verification System (EVS) or already possess an approved agent card and EVS account. The facility ensures all employees complete required background checks and remain compliant with Utah Department of Agriculture and Food requirements.

Agent Name	Position	EVS Status
[redacted]	Manager	Applying for EVS Agent Card
[redacted]	Sales/Production Technician	Current EVS Agent Card
[redacted]	Production	Applying for EVS Agent Card
[redacted]	Operations Technician	Current EVS Agent Card

The facility will maintain copies of all agent cards and notify the Utah Department of Agriculture and Food if any listed agent leaves employment.

ORIGINS

758 Automall Dr. Suite 11, American Fork, Utah 84003

Phone: [redacted] | Email: [redacted]

OPERATING PLAN ATTACHMENT

TITLE: Compliance Outline – 21 CFR 111 Current Good Manufacturing Practices

EFFECTIVE DATE: 1/1/2026

PREPARED BY: [redacted]

This document outlines how the facility meets the principles of 21 CFR Part 111, Current Good Manufacturing Practice (CGMP) for dietary supplement manufacturing, packaging, labeling, and holding operations. These standards are applied to cannabis product manufacturing operations to ensure product quality, consistency, and safety.

Personnel and Training

• All employees receive training in sanitation, safety, and manufacturing procedures.

• Employees must follow facility SOPs and safety protocols.

• Training records are maintained and reviewed periodically.

Sanitation and Hygiene

• Production and storage areas are maintained in sanitary condition.

• Cleaning procedures for equipment and facilities follow documented SOPs.

• Employees follow hygiene practices to prevent contamination.

Equipment and Utensils

• Equipment used in manufacturing is constructed of materials suitable for food or pharmaceutical use.

• Equipment is routinely cleaned, inspected, and maintained.

• Calibration of measurement devices such as scales is performed regularly.

Manufacturing Controls

• Batch production records are maintained for all manufactured products.

• Ingredient quantities and production steps are verified during manufacturing.

• Procedures ensure uniform mixing and product consistency.

Quality Control Operations

• Quality Assurance personnel review production documentation.

• Finished products are evaluated before release.

• Investigations are conducted for deviations or complaints.

Packaging and Labeling

• Packaging operations ensure correct product identity and labeling.

• Labels are reviewed for regulatory compliance.

• Packaging records are maintained for traceability.

Record Keeping

• Manufacturing records, testing documentation, and quality control records are retained for a minimum of five years.

• Records are maintained in a manner that allows regulatory review when requested.

Future Extraction Operations

The facility may implement cannabis extraction operations in the future after obtaining

appropriate regulatory approvals. Potential extraction methods may include:

• Solventless extraction methods (e.g., mechanical separation, rosin pressing, or ice water extraction)

• Non-solvent or closed-loop extraction systems approved by regulators

Prior to implementing extraction operations, the facility will:

• Submit updated operating plans and SOPs to regulators

• Install approved extraction equipment

• Implement additional safety and quality controls

• Train personnel on extraction procedures and hazard controls

21 CFR 111 Compliance Outline

Facility: Origins Processing Facility

Prepared By: [redacted]

Purpose:

This document outlines how the facility meets the requirements of 21 CFR Part 111 – Current Good Manufacturing Practice (cGMP) in Manufacturing, Packaging, Labeling, or Holding Operations for Dietary Supplements. These practices ensure products are consistently produced and controlled according to quality standards.

1. Personnel

All employees are trained in Good Manufacturing Practices (GMP), sanitation, and safety procedures.

Training records are maintained and reviewed regularly.

Employees must follow hygiene requirements including protective clothing, gloves, and hair restraints.

2. Physical Plant and Grounds

The facility is maintained in a clean and sanitary condition.

Production areas are separated to prevent contamination.

Access to restricted areas is limited to authorized personnel.

3. Equipment and Utensils

All equipment used in production is food-grade and maintained in sanitary condition.

Equipment cleaning and maintenance logs are maintained.

Calibration of measuring devices is performed routinely.

4. Production and Process Controls

Batch production records are maintained for all products.

Production follows written Standard Operating Procedures (SOPs).

Ingredient identity, purity, strength, and composition are verified before use.

5. Quality Control Operations

A Quality Assurance system oversees manufacturing activities.

QA personnel review batch records and approve product release.

Any deviations from procedures are documented and investigated.

6. Laboratory Operations

Samples of finished products are submitted to approved laboratories for testing.

Testing includes potency, contaminants, and product identity.

Certificates of Analysis are maintained for all batches.

7. Packaging and Labeling

Products are packaged using tamper-evident and child-resistant packaging where required.

Labels include required product identification and batch information.

Label verification procedures are followed to prevent errors.

8. Holding and Distribution

Finished products are stored in controlled conditions to maintain quality.

Inventory tracking is maintained through the METRC seed-to-sale tracking system.

Distribution records allow complete traceability of each batch.

9. Returned Products

Returned products are evaluated by Quality Assurance.

Products may be quarantined, remediated, or destroyed according to facility SOPs.

10. Recordkeeping

All records including batch production records, testing results, and training logs are retained for a minimum of five years.

Records are maintained in secure electronic or physical storage and are available for regulatory inspection.

ORIGINS

758 Automall Dr. Suite 11, American Fork, Utah 84003

Phone: [redacted] | Email: [redacted]

Product Development and Manufacturing SOPs

This document compiles the Standard Operating Procedures (SOPs) related to research, product development, and manufacturing operations for the Origins cannabis processing facility. These SOPs demonstrate controlled procedures for formulation, mixing, manufacturing, and quality verification of cannabis products.

Research and Development Activities

The facility conducts research and development activities related to product formulation,

pilot batch testing, stability testing, and quality verification of cannabis products.

R&D activities include:

- Development of product formulations
- Evaluation of cannabinoid potency and terpene profiles
- Pilot batch production for quality validation
- Stability and shelf-life testing
- Verification of packaging and labeling processes

Manufacturing SOPs Included

The following SOPs govern manufacturing and formulation activities:

[redacted]

[redacted]

Quality Assurance Oversight

All research and development activities are conducted under Quality Assurance supervision.

Batch records, ingredient quantities, and product outcomes are documented for each

development batch to ensure traceability and regulatory compliance.

Record Retention

All batch records, R&D documentation, and formulation records are maintained for a minimum

of five years and are available to regulators upon request.

ORIGINS

Effective Date: 1/1/2026

Prepared By: [redacted]

Approved By: [redacted]

Last Updated: 4/1/2026

DOCUMENT OVERVIEW

This document serves as the master index for Standard Operating Procedures (SOPs) maintained by Origins. It provides a comprehensive listing of all SOPs organized by category, including SOP number, title, effective date, and current status. This index should be updated whenever a new SOP is created, revised, or retired.

SOP NUMBERING CONVENTION

SOPs are organized using the following numbering system:

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

STANDARD OPERATING PROCEDURE

TITLE: Inventory Control System (ICS) and Seed-to-Sale Tracking

SOP #: 002D

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

REGULATORY REFERENCE: Utah Code 4-41a-103; Utah Administrative Rule R66-2

PURPOSE / POLICY

This procedure establishes the Inventory Control System (ICS) used by the facility to ensure complete accountability and traceability of all cannabis material and cannabis products from receipt through processing, packaging, storage, transport, and final disposition. The ICS integrates with the State of Utah seed-to-sale tracking system (EVS) and complies with Utah Code 4-41a-103 and related administrative rules.

RESPONSIBILITIES

Production Technicians: Record all material movements, weights, and production data in EVS.

Inventory Manager: Maintain accurate inventory records and perform reconciliations.

Quality Assurance: Review batch documentation and investigate discrepancies.

Compliance Officer: Ensure regulatory compliance and maintain records for inspection.

PROCEDURE

[redacted]

[redacted]

[redacted]

[redacted]

[redacted].

ORIGINS

758 Automall Dr. Suite 11, American Fork, Utah 84003

Phone: [redacted] | Email: [redacted]

STANDARD OPERATING PROCEDURE

TITLE: Cannabis Storage Protocols

SOP #: 002E

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

REGULATORY REFERENCE: Utah Code §4-41a; Utah Admin Code R66-2

PURPOSE

This SOP establishes procedures for the short-term and long-term storage of cannabis materials and cannabis products to ensure sanitary conditions, maintain product integrity, and comply with Utah cannabis processing regulations.

SCOPE

This procedure applies to all facility personnel responsible for storing, handling, or monitoring cannabis inventory within the facility.

SHORT-TERM STORAGE

Short-term storage includes cannabis materials actively being processed or awaiting quality assurance review.

These materials are stored in designated areas such as raw material storage, in-process storage, quarantine areas, and packaging staging areas.

All materials placed into short-term storage must:

- Be clearly labeled with batch or lot identifiers
- Be recorded within the facility Inventory Control System (ICS)

• Be stored in sealed, food-grade containers

• Be protected from contamination and environmental exposure

LONG-TERM STORAGE

Finished cannabis products and bulk materials awaiting distribution are stored in secure, restricted-access storage areas or vaults.

Long-term storage procedures include:

• Maintaining sealed packaging

• Storing products by batch or lot number

• Maintaining controlled environmental conditions

• Tracking all inventory within the state seed-to-sale system

Products remain in storage until transferred to licensed facilities, distributed, or destroyed according to regulatory requirements.

SANITATION AND CONTAMINATION PREVENTION

Storage areas are maintained in accordance with facility sanitation SOPs.

Routine cleaning schedules, pest prevention controls, and proper storage practices are implemented to prevent contamination or product degradation.

Cannabis products are stored separately from chemicals, cleaning agents, and non-production materials.

SECURITY AND ACCESS CONTROL

All cannabis storage areas are located within restricted access areas monitored by the facility security system.

Security measures include:

• Controlled access doors

• Video surveillance

• Inventory tracking through the Inventory Control System

• Access restricted to authorized facility agents only

RECORD KEEPING

All storage activities are documented within the facility Inventory Control System including batch identification, storage location, quantities stored, and inventory movement.

Records are maintained for a minimum of five (5) years and made available to regulatory authorities upon request.

STANDARD OPERATING PROCEDURE

TITLE: Facility Security Plan – Access Control, Surveillance, and Alarm Systems

SOP #: 003A

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

PURPOSE

This SOP establishes the security protocols for the Origins cannabis facility located at 758 Automall Dr. Suite 11, American Fork, Utah 84003. This plan ensures compliance with all Utah Department of Agriculture and Food (UDAF) requirements for cannabis facility security, including access control, video surveillance, alarm systems, visitor management, and incident response. The goal is to prevent unauthorized access, theft, diversion, and loss of cannabis products at all stages of operation.

SCOPE

This SOP applies to all employees, contractors, visitors, and any individual entering the Origins facility. It covers all areas of the facility including cultivation areas, processing rooms, storage vaults, loading docks, and administrative offices.

RESPONSIBILITIES

- The Facility Manager is responsible for overall security system oversight and ensuring all systems are operational.
- The Compliance Officer ensures all security measures meet UDAF regulatory requirements and conducts periodic audits.
- All employees are responsible for following access control procedures and reporting any security incidents immediately.

- The designated Security Contact is responsible for coordinating with local law enforcement and alarm monitoring services.

ACCESS CONTROL

The facility utilizes an electronic access control system to restrict entry to authorized personnel only. All exterior doors and doors to limited-access areas are equipped with electronic locks requiring keycard or PIN code access.

- Each employee is issued a unique access credential (keycard or code) that is logged in the access control system.
- Access credentials are assigned based on job function and are limited to areas necessary for the employee's role.
- All access events (entries and exits) are electronically recorded and retained for a minimum of one (1) year.
- Lost or stolen access credentials must be reported immediately to the Facility Manager and will be deactivated within one (1) hour of notification.
- Former employees' access credentials are deactivated immediately upon termination or separation.
- All exterior doors are self-closing and self-locking. Doors must not be propped open at any time.

LIMITED-ACCESS AREAS

Certain areas of the facility are designated as limited-access areas and are restricted to authorized personnel only. These areas include:

- Cannabis storage vaults and safes
- Processing and manufacturing rooms
- Quarantine and waste storage areas
- Server and security equipment rooms

Only employees whose job functions require access to these areas are granted credentials. A current list of employees authorized for each limited-access area is maintained by the Compliance Officer and reviewed quarterly.

VIDEO SURVEILLANCE

The facility is equipped with a comprehensive video surveillance system that provides continuous monitoring of all areas where cannabis is cultivated, processed, stored, or transferred.

- Cameras are positioned to capture clear footage of all entry and exit points, limited-access areas, processing areas, storage areas, point-of-sale areas, and loading/unloading zones.
- All cameras record at a minimum resolution of 1920x1080 (1080p) and are capable of producing clear images in both daylight and low-light conditions.
- Video recordings are stored on-site on a secured digital video recorder (DVR) or network video recorder (NVR) system.
- All video recordings are retained for a minimum of forty-five (45) days.
- The surveillance system is operational twenty-four (24) hours a day, seven (7) days a week, three hundred sixty-five (365) days a year.
- The surveillance system includes an uninterruptible power supply (UPS) capable of maintaining operation during a power outage.
- Access to surveillance recordings is limited to the Facility Manager, Compliance Officer, and law enforcement upon request.
- Surveillance system maintenance is performed monthly and documented in the facility maintenance log.

ALARM SYSTEM

The facility is equipped with a professionally monitored alarm system that detects unauthorized entry, motion after hours, and environmental hazards.

- The alarm system includes sensors on all exterior doors and windows, motion detectors in limited-access areas, and panic/duress alarms at key locations.
- The alarm system is monitored twenty-four (24) hours a day by a licensed third-party alarm monitoring company.
- In the event of an alarm activation, the monitoring company will attempt to contact the designated facility contact. If contact cannot be made, local law enforcement will be dispatched immediately.
- The alarm system is tested monthly by the Facility Manager and documented in the security log.
- All alarm activations, whether actual or false, are documented including date, time, nature of activation, response taken, and personnel involved.
- The alarm system includes a backup power supply to maintain operation during power outages.

VISITOR MANAGEMENT

All visitors to the facility must follow the visitor management procedures.

- All visitors must present valid government-issued identification upon arrival.

- Visitors must sign in on the visitor log, which records their name, date, time of arrival, purpose of visit, and the employee responsible for escorting them.
- Visitors are not permitted in limited-access areas unless accompanied by an authorized employee at all times.
- Visitor badges are issued upon entry and collected upon departure.
- The visitor log is retained for a minimum of one (1) year.

CANNABIS TRANSPORTATION SECURITY

When cannabis products are transported to or from the facility, the following security measures apply:

- All cannabis shipments are documented in the EVS seed-to-sale tracking system prior to transport.
- Transport vehicles are locked at all times when containing cannabis products.
- A minimum of two (2) authorized employees must accompany any cannabis transport.
- Transport routes and schedules are not disclosed publicly.
- Transport manifests are maintained and available for inspection.

INCIDENT RESPONSE

In the event of a security breach, theft, or diversion, the following steps are taken:

- The Facility Manager is notified immediately.
- Local law enforcement is contacted if criminal activity is suspected.
- UDAF is notified within twenty-four (24) hours of discovery of any theft, diversion, or significant security breach as required by regulation.
- A written incident report is completed documenting the nature of the incident, the date and time of discovery, actions taken, personnel involved, and any product affected.
- Surveillance footage is preserved and made available to law enforcement and UDAF upon request.
- The Compliance Officer conducts a root cause analysis and implements corrective actions to prevent recurrence.

RECORD KEEPING

All security-related records are maintained for a minimum of one (1) year unless a longer retention period is required by regulation. Records include:

- Access control logs
- Video surveillance recordings (minimum 45 days)

- Alarm activation reports
- Visitor logs
- Security incident reports
- System maintenance and testing logs
- Employee access authorization lists

EMPLOYEE TRAINING

All employees receive security training upon hire and annually thereafter. Training covers:

- Proper use of access control systems
- Only employees whoseIdentification and reporting of security concerns
- Visitor management procedures
- Emergency and incident response procedures
- Confidentiality of security protocols and system information

Training records are maintained by the Compliance Officer and retained for the duration of employment plus one (1) year.

STANDARD OPERATING PROCEDURE

TITLE: Manufacturing of Cannabis Vape Cartridges

SOP #: 005A

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

PURPOSE / POLICY

This procedure defines the standardized process for manufacturing the specified cannabis product. All formulation details, ingredient quantities, processing parameters, and potency targets are defined within the approved Master Batch Record (MBR) for the product. Production personnel must verify the correct MBR before beginning manufacturing.

RESPONSIBILITIES

Production Technicians: Perform manufacturing activities and complete batch documentation.

Quality Assurance: Verify batch records, review quality checks, and approve product release.

Manufacturing Manager: Ensure SOP compliance and proper equipment operation.

REQUIRED EQUIPMENT

[redacted]

[redacted]

[redacted]

[redacted]

PROCEDURE

All ingredient quantities, processing parameters, and formulation details are defined in the approved Master Batch Record (MBR). Production must follow the MBR instructions for each batch.

[redacted]

[redacted]

[redacted]

[redacted]

QUALITY CONTROL INSPECTION

Quality Assurance (QA) personnel conduct a thorough inspection of all cannabis vape cartridges prior to final packaging and release.

Inspection includes:

[redacted]

QUALITY ASSURANCE RELEASE

Quality Assurance verifies packaging accuracy, labeling compliance, and batch documentation before packaged vape cartridges are approved for distribution. QA personnel confirm that each batch has a valid Certificate of Analysis (COA) on file and that all labeling meets Utah regulatory requirements prior to release.

RECORD KEEPING

All manufacturing activities, QC inspection results, batch records, and waste transfers are documented within the facility Inventory Control System and maintained for a minimum of five (5) years.

STANDARD OPERATING PROCEDURE

TITLE: Manufacturing of Cannabis Tinctures

SOP #: 005B

EFFECTIVE DATE 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

PURPOSE / POLICY

This procedure defines the standardized process for manufacturing the specified cannabis product. All formulation details, ingredient quantities, processing parameters, and potency targets are defined within the approved Master Batch Record (MBR) for the product. Production personnel must verify the correct MBR before beginning manufacturing.

RESPONSIBILITIES

Production Technicians: Perform manufacturing activities and complete batch documentation.

Quality Assurance: Verify batch records, review quality checks, and approve product release.

Manufacturing Manager: Ensure SOP compliance and proper equipment operation.

REQUIRED EQUIPMENT

[redacted]

[redacted]

[redacted]

[redacted]

PROCEDURE

All ingredient quantities, processing parameters, and formulation details are defined in the approved Master Batch Record (MBR). Production must follow the MBR instructions for each batch.

[redacted]

[redacted]

[redacted]

[redacted]

QUALITY CONTROL INSPECTION

Quality Assurance (QA) personnel conduct a thorough inspection of all cannabis tinctures prior to final packaging and release.

Inspection includes:

[redacted]

QUALITY ASSURANCE RELEASE

Quality Assurance verifies packaging accuracy, labeling compliance, and batch documentation before packaged tinctures are approved for distribution. QA personnel confirm that each batch has a valid Certificate of Analysis (COA) on file and that all labeling meets Utah regulatory requirements prior to release.

All tincture manufacturing activities, QC inspection results, batch records, and waste transfers are documented within the facility Inventory Control System and maintained for a minimum of five (5) years.

STANDARD OPERATING PROCEDURE

TITLE: Sampling and Testing of Cannabis Products

SOP #: 005C

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

PURPOSE / POLICY

This procedure describes the sampling and testing requirements for cannabis materials, in-process products, and finished goods.

RESPONSIBILITIES

Quality Assurance coordinates sampling and testing.

Production staff assist with sample collection.

Compliance ensures chain-of-custody and laboratory submission.

PROCEDURE

[redacted]

RECORDKEEPING

Testing records and laboratory reports will be maintained for a minimum of five years.

STANDARD OPERATING PROCEDURE

TITLE: Cannabis Concentrate Blending and Dispensing

SOP #: 005D

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

PURPOSE / POLICY

This procedure defines the standardized process for blending, handling, and dispensing cannabis concentrates used in finished products. All formulation details, ingredient quantities, and processing parameters are defined within the approved Master Batch Record (MBR). Production personnel must verify the correct MBR prior to initiating manufacturing activities.

RESPONSIBILITIES

Production Technicians: Perform concentrate blending and document batch data.

Quality Assurance: Verify batch records and perform quality review.

Inventory Manager: Ensure EVS tracking and inventory reconciliation.

REQUIRED EQUIPMENT

[redacted]

PROCEDURE

All ingredient quantities, mixing parameters, and batch information are defined in the approved Master Batch Record (MBR). Personnel must verify the correct MBR before beginning any blending or dispensing operations.

[redacted]

QUALITY CONTROL INSPECTION

Quality Assurance (QA) personnel conduct a thorough inspection of all cannabis concentrate batches prior to final packaging and release.

Inspection includes:

- [redacted]

Only concentrate that meets all quality standards is approved for packaging and distribution.

QUALITY ASSURANCE RELEASE

Quality Assurance verifies packaging accuracy, labeling compliance, and batch documentation before packaged concentrate is approved for distribution. QA personnel confirm that each batch has a valid Certificate of Analysis (COA) on file, residual solvent levels are within acceptable limits, and all labeling meets Utah regulatory requirements prior to release.

RECORD KEEPING

All concentrate blending activities, QC inspection results, batch records, and waste transfers are documented within the facility Inventory Control System and maintained for a minimum of five (5) years.

STANDARD OPERATING PROCEDURE

TITLE: Manufacturing of Cannabis Capsules

SOP #: 005E

EFFECTIVE DA 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

PURPOSE / POLICY

This procedure defines the standardized process for manufacturing the specified cannabis product. All formulation details, ingredient quantities, processing parameters, and potency targets are defined within the approved Master Batch Record (MBR) for the product. Production personnel must verify the correct MBR before beginning manufacturing.

RESPONSIBILITIES

Production Technicians: Perform manufacturing activities and complete batch documentation.

Quality Assurance: Verify batch records, review quality checks, and approve product release.

Manufacturing Manager: Ensure SOP compliance and proper equipment operation.

REQUIRED EQUIPMENT

[redacted]

PROCEDURE

All ingredient quantities, processing parameters, and formulation details are defined in the approved Master Batch Record (MBR). Production must follow the MBR instructions for each batch.

[redacted]

[redacted]

QUALITY CONTROL INSPECTION

Quality Assurance (QA) personnel conduct a thorough inspection of all cannabis capsules prior to final packaging and release.

Inspection includes:

[redacted]

QUALITY ASSURANCE RELEASE

Quality Assurance verifies packaging accuracy, unit count accuracy, labeling compliance (including per-capsule dosage disclosure), and batch documentation before packaged capsules are approved for distribution. QA personnel confirm that each batch has a valid Certificate of Analysis (COA) on file and that all labeling meets Utah regulatory requirements prior to release.

All capsule manufacturing activities, QC inspection results, batch records, and waste transfers are documented within the facility Inventory Control System and maintained for a minimum of five (5) years.

STANDARD OPERATING PROCEDURE

Cannabis Oil Homogenization and Terpene Addition

SOP #: 005F

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

PURPOSE

Establish procedures for homogenizing cannabis oil and adding terpene blends to ensure consistent formulation, potency distribution, and product quality for vape and infused oil products.

SCOPE

Applies to all personnel responsible for mixing cannabis oils with terpene blends or other approved flavoring agents during product formulation.

RESPONSIBILITIES

Production Personnel: Perform oil homogenization and terpene addition according to batch records.

Quality Assurance: Verify ingredient quantities, mixing procedures, and final mixture uniformity.

MATERIALS

[redacted]

EQUIPMENT

[redacted]

PROCEDURE

[redacted]

QUALITY CONTROL

Quality Assurance shall verify:

[redacted]

RECORD KEEPING

All batch records and formulation documentation shall be retained for a minimum of five (5) years and made available to regulators upon request.

ORIGINS

758 Automall Dr. Suite 11, American Fork, Utah 84003

Phone: [redacted] Email: [redacted]

STANDARD OPERATING PROCEDURE

TITLE: Packaging and Quality Control of Cannabis Flower

SOP #: 005G

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

REGULATORY REFERENCE: Utah Code §4-41a; Utah Administrative Code R68-28

PURPOSE

This SOP establishes procedures for the quality control inspection, packaging, labeling, and handling of cannabis flower products.

The procedure ensures product quality, regulatory compliance, and proper handling of excess or waste material for transfer to oil production.

SCOPE

This procedure applies to all facility personnel responsible for receiving, inspecting, packaging, labeling, and documenting cannabis flower products.

RECEIPT OF CANNABIS FLOWER

Cannabis flower received from a licensed cultivator or processor must be logged into the facility Inventory Control System (ICS) and seed-to-sale tracking system.

Upon receipt:

[redacted]

[redacted]

[redacted]

[redacted]

QUALITY CONTROL INSPECTION

Quality Assurance personnel perform an inspection of all incoming cannabis flower prior to packaging.

Inspection includes:

[redacted]

Only material that meets quality standards is released for packaging.

FLOWER PACKAGING PROCEDURE

Approved cannabis flower is weighed using calibrated precision scales and packaged into approved retail containers.

Packaging procedures include:

[redacted]

LABELING REQUIREMENTS

All packaged cannabis flower must include labels containing:

- Product name
- Batch or lot number
- Net weight
- Required regulatory warnings

• Unique package identifier from the seed-to-sale system

HANDLING OF TRIM AND WASTE MATERIAL

Small plant fragments, trim, or excess flower generated during packaging are collected in designated containers.

These materials are documented within the Inventory Control System and transferred to the facility's cannabis oil production process when applicable.

Material unsuitable for processing is handled according to the facility Cannabis Waste Disposal SOP.

QUALITY ASSURANCE RELEASE

Quality Assurance verifies packaging accuracy, labeling compliance, and batch documentation before packaged flower is approved for distribution.

RECORD KEEPING

All packaging activities, waste transfers, and batch records are documented within the facility Inventory Control System and maintained for a minimum of five (5) years.

STANDARD OPERATING PROCEDURE

TITLE: Manufacturing of Cannabis Infused Gummies

SOP #: 005H

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

PURPOSE / POLICY

Procedures for producing cannabis-infused gummies while ensuring product consistency, safety, and regulatory compliance.

RESPONSIBILITIES

Production Technicians prepare and mix gummy ingredients.

Quality Assurance verifies ingredient measurements and dosage calculations.

Manufacturing Manager oversees production and batch documentation.

PROCEDURE

[redacted]

QUALITY CONTROL INSPECTION

Quality Assurance (QA) personnel conduct a thorough inspection of all cannabis-infused gummies prior to final packaging and release.

Inspection includes:



Only gummies that meet all quality standards are approved for packaging and distribution.

QUALITY ASSURANCE RELEASE

Quality Assurance verifies packaging accuracy, labeling compliance (including per-serving dosage disclosure), and batch documentation before packaged gummies are approved for distribution. QA personnel confirm that each batch has a valid Certificate of Analysis (COA) on file and that all labeling meets Utah regulatory requirements prior to release.

RECORD KEEPING

All gummy manufacturing activities, QC inspection results, batch records, and waste transfers are documented within the facility Inventory Control System and maintained for a minimum of five (5) years.

STANDARD OPERATING PROCEDURE

TITLE: Manufacturing of Cannabis Topicals

SOP #: 005I

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

PURPOSE / POLICY

This procedure defines the standardized process for manufacturing the specified cannabis product. All formulation details, ingredient quantities, processing parameters, and potency targets are defined within the approved Master Batch Record (MBR) for the product. Production personnel must verify the correct MBR before beginning manufacturing.

RESPONSIBILITIES

Production Technicians: Perform manufacturing activities and complete batch documentation.

Quality Assurance: Verify batch records, review quality checks, and approve product release.

Manufacturing Manager: Ensure SOP compliance and proper equipment operation.

REQUIRED EQUIPMENT

[redacted]

PROCEDURE

All ingredient quantities, processing parameters, and formulation details are defined in the approved Master Batch Record (MBR). Production must follow the MBR instructions for each batch.

[redacted]

[redacted]

QUALITY CONTROL INSPECTION

Quality Assurance (QA) personnel conduct a thorough inspection of all cannabis-infused topical products prior to final packaging and release.

Inspection includes:

[redacted]

QUALITY ASSURANCE RELEASE

Quality Assurance verifies packaging accuracy, labeling compliance, and batch documentation before packaged topical products are approved for distribution. QA personnel confirm that each batch has a valid Certificate of Analysis (COA) on file and that all labeling meets Utah regulatory requirements prior to release.

All topical manufacturing activities, QC inspection results, batch records, and waste transfers are documented within the facility Inventory Control System and maintained for a minimum of five (5) years.

STANDARD OPERATING PROCEDURE

TITLE: Manufacturing of Cannabis Vape Pods

SOP #: 005J

EFFECTIVE DATE: 3/31/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

PURPOSE / POLICY

This Standard Operating Procedure establishes the process for manufacturing cannabis vape pods at Origins. Vape pods are pre-filled, closed-system cannabis oil reservoirs designed to be used with compatible pod-based vaporizer devices. This SOP ensures consistent product quality, accurate fill weights, compliance with Utah cannabis regulations under R66-2, and the safety of personnel and consumers throughout the manufacturing process.

RESPONSIBILITIES

Production Manager: Oversees manufacturing operations, ensures staff are trained on this SOP, and approves all batch production records before release.

Production Technicians: Responsible for all filling, sealing, labeling, and packaging operations in compliance with this SOP.

Quality Assurance (QA) Personnel: Conduct all quality inspections, approve product for release, and maintain all batch documentation.

REQUIRED EQUIPMENT

[redacted]

[redacted]

[redacted]

[redacted]pod)

[redacted]

PROCEDURE

[redacted]

[redacted]

[redacted]

[redacted]

QUALITY ASSURANCE RELEASE

[redacted]

RECORD KEEPING

All vape pod batch production records, including in-process fill weight logs, QC inspection results, hardware function test results, COA references, label verification sign-offs, and QA release documentation, shall be maintained in the facility Inventory Control System (ICS) for a minimum of five (5) years in accordance with Utah cannabis regulations. Physical

batch records are stored in the QA document archive and are available for regulatory inspection upon request.

Date: 3/31/2026 – Initial creation of SOP 005J Vape Pod Manufacturing

Prepared By: [redacted]

STANDARD OPERATING PROCEDURE

TITLE: Cannabis Suppositories Manufacturing

SOP #: 005M

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

PURPOSE / POLICY

This SOP establishes the procedures for manufacturing cannabis-infused suppositories in a controlled, sanitary environment to ensure consistent dosing, product safety, and compliance with Utah medical cannabis processing regulations.

RESPONSIBILITIES

- Production Technicians prepare formulations and perform manufacturing operations.
- Quality Assurance verifies ingredient weights, batch documentation, and quality checks.
- Operations Manager oversees manufacturing compliance and recordkeeping.

MATERIALS

[redacted]

PROCEDURE

[redacted]

[redacted]

QUALITY CONTROL

Quality Assurance will review batch records, verify ingredient quantities, and confirm dosage accuracy. Samples may be submitted for laboratory testing to confirm potency and safety.

STORAGE

Finished suppositories will be stored in a secure, climate-controlled area until released by Quality Assurance for distribution.

RECORDKEEPING

All batch records, testing documentation, and production logs will be retained for a minimum of five (5) years and made available to regulatory authorities upon request.

ORIGINS

758 Automall Dr. Suite 11, American Fork, Utah 84003

Phone: [redacted] | Email: [redacted]

STANDARD OPERATING PROCEDURE

TITLE: Procedure for the Use of Cannabinoid Isolate

SOP #: 006A

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

REGULATORY REFERENCE: Utah Admin Code R66-2-7(5); Utah Code §4-41a

PURPOSE

This SOP establishes procedures for the receipt, storage, handling, and use of cannabinoid isolate in the manufacturing of cannabis products. These procedures ensure compliance with Utah Administrative Rule R66-2-7(5) and applicable cannabis processing regulations.

SCOPE

This procedure applies to all facility personnel involved in handling cannabinoid isolate for formulation and manufacturing of cannabis products including tinctures, vape cartridges, topicals, capsules, and other infused products.

RECEIPT OF ISOLATE

All cannabinoid isolate received by the facility must originate from a licensed cannabis processing facility or authorized supplier.

Upon receipt:

[redacted]

[redacted]

[redacted]

[redacted]

STORAGE

Cannabinoid isolate is stored in sealed, clearly labeled containers within a restricted-access storage area.

Storage requirements include:

- Controlled environmental conditions
- Protection from contamination
- Storage in food-grade containers
- Access limited to authorized facility agents

HANDLING AND MEASUREMENT

Before use, Quality Assurance verifies that the isolate has been released for production.

Production personnel measure the required quantity of isolate using calibrated precision scales according to approved batch production records.

MANUFACTURING USE

Measured cannabinoid isolate is incorporated into product formulations according to the approved formulation or batch record.

Products may include:

[redacted]

Mixing procedures follow the facility formulation and manufacturing SOPs to ensure uniform distribution.

QUALITY CONTROL

Quality Assurance verifies ingredient weights, batch record completion, and product uniformity prior to packaging or release.

RECORD KEEPING

All isolate receipt, storage, and use is documented within the facility Inventory Control System and batch production records.

Records are maintained for a minimum of five (5) years and made available to regulators upon request.

ORIGINS

758 Automall Dr. Suite 11, American Fork, Utah 84003

Phone: [redacted] Email: [redacted]

STANDARD OPERATING PROCEDURE

TITLE: Emergency Procedures – Fire, Chemical Spill, and Facility Emergencies

SOP #: 007A

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

REGULATORY REFERENCE: Utah Code §4-41a; Utah Admin Code R68-28

PURPOSE

This SOP establishes emergency procedures for fire, chemical spills, medical emergencies, and other safety incidents that may occur at the facility. These procedures ensure employee safety and regulatory compliance. Material Safety Data Sheets (MSDS/SDS) for all chemicals used at the facility are maintained in accessible locations for all employees.

SCOPE

These procedures apply to all employees, contractors, and visitors present at the facility during any emergency event.

GENERAL EMERGENCY PROCEDURES

• Immediately notify a supervisor or facility manager.

• Activate emergency alarms if necessary.

• Call 911 for emergencies involving fire, injury, or hazardous chemical exposure.

• Evacuate the building using the nearest exit.

• Assemble at the designated emergency assembly point outside the facility.

• Supervisors will account for all personnel.

• Do not re-enter the facility until authorized by emergency responders or facility management.

FIRE EMERGENCY

In the event of a fire:

• Activate the nearest fire alarm if available.

• Call 911 immediately.

• If safe to do so, use an appropriate fire extinguisher.

• Evacuate the building following posted exit routes.

• Close doors behind you to slow fire spread.

• Proceed to the designated assembly area outside the facility.

CHEMICAL SPILL

In the event of a chemical spill:

• Immediately alert nearby personnel.

• Avoid direct contact with the chemical.

• Consult the appropriate Safety Data Sheet (SDS).

• If the spill presents a hazard, evacuate the area.

• Trained personnel may use spill kits to contain small spills.

• Report the spill to facility management immediately.

MEDICAL EMERGENCY

If a medical emergency occurs:

• Call 911 immediately.

• Provide first aid if trained to do so.

• Do not move injured individuals unless necessary for safety.

• Notify facility management.

MSDS / SAFETY DATA SHEETS

Safety Data Sheets (SDS) for all chemicals used at the facility are maintained in clearly labeled binders and accessible locations within production and storage areas. Employees are trained on how to access SDS documentation during emergencies.

EMPLOYEE TRAINING

All employees receive training on emergency procedures, evacuation routes, fire extinguisher locations, and spill response procedures as part of facility safety training.

RECORD KEEPING

Training records, incident reports, and emergency response documentation are maintained for a minimum of five (5) years and made available to regulators upon request.

ORIGINS

758 Automall Dr. Suite 11, American Fork, Utah 84003

Phone: [redacted] Email: [redacted]

STANDARD OPERATING PROCEDURE

TITLE: Cannabis Waste Disposal Plan

SOP #: 008A

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

REGULATORY REFERENCE: Utah Code §4-41a-405; Utah Administrative Rule R66-2-17

PURPOSE

This SOP establishes procedures for the disposal and destruction of cannabis waste and unusable cannabis products. The procedures ensure compliance with Utah Code §4-41a-405 and applicable Utah Administrative Rules governing cannabis waste disposal.

SCOPE

This procedure applies to all employees involved in handling, documenting, or supervising the disposal of cannabis waste generated by processing, manufacturing, packaging, or quality assurance operations.

IDENTIFICATION OF CANNABIS WASTE

Cannabis waste includes:

- Unusable cannabis plant material
- Failed or contaminated product
- Expired cannabis products
- Waste generated during manufacturing
- Cannabis products that fail quality assurance testing

WASTE TRACKING

All cannabis waste is recorded within the facility Inventory Control System and seed-to-sale tracking system prior to destruction. Records include:

- Batch or lot identification
- Quantity of material destroyed
- Date and time of destruction
- Personnel overseeing the destruction process

WASTE RENDERING PROCEDURE

Prior to disposal, cannabis waste must be rendered unusable and unrecognizable. The facility will combine cannabis waste with non-cannabis materials such as:

- soil or compost
- food waste
- paper waste or other inert materials

The mixture will ensure cannabis cannot be diverted or recovered for consumption.

WASTE STORAGE PRIOR TO DESTRUCTION

Cannabis waste awaiting destruction will be stored in clearly labeled containers within a secure and restricted-access waste storage area. Access to this area is limited to authorized facility agents.

FINAL DISPOSAL

After cannabis waste is rendered unusable and unrecognizable, it will be disposed of in accordance with local waste management regulations. Disposal may include transport to a licensed waste management facility or approved landfill.

QUALITY ASSURANCE OVERSIGHT

Quality Assurance personnel verify that all waste destruction procedures are properly documented and conducted according to regulatory requirements.

RECORD KEEPING

All waste disposal documentation is maintained for a minimum of five (5) years and made available to regulatory authorities upon request.

ORIGINS

758 Automall Dr. Suite 11, American Fork, Utah 84003

Phone: [redacted] | Email: [redacted]

STANDARD OPERATING PROCEDURE

TITLE: Medical Cannabis Transport and Transfer Procedures

SOP #: 009A

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

REGULATORY REFERENCE: Utah Code §4-41a-404; Utah Administrative Rules R68-28

PURPOSE

This SOP establishes procedures for the secure transportation and transfer of medical cannabis and cannabis products between licensed facilities in compliance with Utah Code §4-41a-404 and applicable Utah Administrative Rules.

SCOPE

This procedure applies to all facility personnel involved in preparing, documenting, transporting, or receiving cannabis products between licensed cannabis processing facilities, cultivators, and medical cannabis pharmacies.

AUTHORIZED PERSONNEL

Only registered cannabis facility agents with valid agent cards may participate in transportation activities. All transporting agents must be listed on the transport manifest and verified through the facility's personnel authorization procedures.

TRANSPORT MANIFEST

Prior to transport, a transport manifest is generated through the state seed-to-sale tracking system. The manifest includes:

- Originating facility information
- Destination facility information

• Product batch or package identifiers

• Quantity being transported

• Date and time of departure

• Names of transporting agents

• Vehicle identification information

PACKAGING REQUIREMENTS

All cannabis products must be packaged and sealed prior to transport. Packages must be labeled with batch or lot numbers and tracked within the Inventory Control System. Products must remain in sealed containers during transport.

VEHICLE SECURITY

Transportation vehicles must be operated by authorized agents and must remain locked when unattended. Cannabis products must be stored in secured containers or locked compartments within the vehicle to prevent diversion or unauthorized access.

TRANSFER PROCEDURES

Upon arrival at the destination facility:

• Receiving personnel verify the transport manifest

• Package identifiers and quantities are inspected

• Products are logged into the receiving facility inventory system

• Any discrepancies are documented and reported to facility management

CHAIN OF CUSTODY

A documented chain of custody is maintained from the originating facility through transport to the receiving facility. Transport manifests and transfer records ensure full traceability of all cannabis products.

SECURITY AND INCIDENT REPORTING

Any transportation incident, product discrepancy, or security concern must be immediately reported to facility management and documented according to facility incident reporting procedures.

RECORD KEEPING

All transport manifests and transfer records are maintained for a minimum of five (5) years and made available to regulatory authorities upon request.

STANDARD OPERATING PROCEDURE

TITLE: Cannabis Product Remediation Plan

SOP #: 010A

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

PURPOSE / POLICY

This procedure establishes the remediation process for cannabis materials or cannabis products that fail quality assurance testing. The facility will evaluate, remediate, or destroy non-compliant products while maintaining regulatory compliance, product safety, and full traceability within the EVS seed-to-sale tracking system.

RESPONSIBILITIES

• Quality Assurance Manager evaluates laboratory failures and approves remediation actions.

• Compliance personnel ensure proper documentation in EVS and facility records.

• Production staff perform approved remediation procedures.

• Two authorized employees verify remediation and documentation accuracy.

PROCEDURE

1. If a cannabis batch fails laboratory testing, the batch will immediately be placed in a designated quarantine area.

2. The batch will be clearly labeled 'FAILED TESTING – QUARANTINED – NOT FOR DISTRIBUTION'.

3. The batch status will be updated in the EVS seed-to-sale tracking system.

4. The Quality Assurance Manager will review the laboratory report to determine whether remediation is permitted under applicable regulations.

5. If remediation is allowed, the batch may be processed into another product type or reformulated in accordance with approved manufacturing procedures.

6. Acceptable remediation actions may include reformulation, dilution with additional ingredients, filtration, conversion to concentrate, or further processing.

7. After remediation is completed, the product will be assigned a new batch record if required and resampled.

8. Samples will be submitted to a state-approved laboratory for full compliance testing.

9. The remediated batch will remain in quarantine until passing test results are received.

10. If remediation is not possible or fails to meet testing requirements, the batch will be destroyed in accordance with the facility's Cannabis Product Destruction SOP and Utah regulations.

RETESTING REQUIREMENTS

All remediated batches must undergo complete laboratory testing by a licensed independent testing laboratory before they can be released for distribution.

DOCUMENTATION

All remediation activities will be documented including batch identification, reason for remediation, method used, personnel involved, and laboratory results. Records will be maintained for a minimum of five (5) years and made available to regulatory authorities upon request.

STANDARD OPERATING PROCEDURE

TITLE: Medical Cannabis Product Recall Plan

SOP #: 011A

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

PURPOSE / POLICY

This procedure establishes the system for identifying, managing, and executing the recall of cannabis products that may pose a risk to public health or that do not meet regulatory or quality standards. This recall plan complies with Utah Administrative Rule R66-2-15 and ensures rapid removal of affected products from distribution while maintaining full traceability through the EVS seed-to-sale tracking system.

RECALL COORDINATORS

Primary Recall Coordinator:

Name: [redacted]

Title: Compliance Director / Operations Manager

Phone: [redacted]

Email: [redacted]

Alternate Recall Coordinator:

Name: Director of Quality Assurance or Designated Facility Manager

Phone: [redacted]

Email: [redacted]

RESPONSIBILITIES

• The Recall Coordinator will manage all recall activities.

• Quality Assurance personnel will evaluate product issues and assist with investigations.

• Production and compliance staff will assist with product identification, quarantine, and documentation.

PROCEDURE

1. A recall may be initiated if laboratory testing identifies contamination, incorrect potency, labeling errors, packaging defects, or if directed by a regulatory authority.

2. The Recall Coordinator will notify the Utah Department of Agriculture and Food (UDAF) within 24 hours of determining a recall is necessary.

3. The notification will include product name, batch or lot number, quantity affected, reason for recall, and distribution records.

4. All affected cannabis facilities or dispensaries receiving the product will be contacted immediately via phone and written email notification.

5. The notification will instruct receiving facilities to immediately stop distribution and quarantine affected products.

6. The facility will update the product status in the EVS seed-to-sale tracking system to indicate recall status.

7. All remaining affected products at the facility will be clearly labeled 'RECALLED – DO NOT DISTRIBUTE' and moved to a designated quarantine storage area.

8. Recalled products may be returned to the processing facility or destroyed in accordance with Utah Code 4-41a-405 and Administrative Rule R66-2-17.

9. If products were sold to patients, dispensaries will notify patients and instruct them to discontinue use and return the product.

10. Quality Assurance will conduct a root cause investigation to determine the reason for the recall and implement corrective actions.

11. A recall effectiveness check will be performed to confirm all affected products have been removed from distribution.

RECORDKEEPING

All recall documentation including notifications, investigation reports, corrective actions, and product disposition records will be maintained for a minimum of five (5) years and made available to regulatory authorities upon request.

STANDARD OPERATING PROCEDURE

TITLE: Destruction of Failed or Waste Cannabis Products

SOP #: 011B

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

PURPOSE / POLICY

This procedure establishes the process for handling and destroying cannabis products that fail quality assurance testing or are otherwise deemed waste. All destruction activities will comply with Utah Code 4-41a-405 and Utah Administrative Rule R66-2-17. Cannabis waste will be rendered unusable and unrecognizable prior to disposal and documented in the EVS seed-to-sale tracking system.

RESPONSIBILITIES

• Quality Assurance Manager determines if product must be destroyed.

• Compliance staff ensure EVS documentation is accurate.

• Two authorized employees witness and document destruction.

• Operations staff perform the physical destruction procedure.

GENERAL DESTRUCTION REQUIREMENTS

1. Any cannabis product failing laboratory testing or deemed unsuitable for sale will be immediately placed in quarantine and labeled 'FAILED TESTING – NOT FOR DISTRIBUTION'.
2. The product will be recorded in EVS as waste prior to destruction.
3. Cannabis waste must be rendered unusable and unrecognizable before disposal.
4. A minimum of two authorized employees must witness the destruction.
5. All destruction activities must be documented including date, product type, batch number, quantity, method of destruction, and personnel involved.

DESTRUCTION METHODS BY PRODUCT TYPE

Flower: Cannabis flower will be ground and mixed with inert waste material such as soil, food waste, or other non-consumable material until the cannabis is unusable and unrecognizable.

Vape Cartridges: Cartridges will be punctured or disassembled. Remaining oil will be absorbed into inert waste material prior to disposal.

Concentrates: Cannabis concentrates will be mixed with absorbent inert waste materials to render the product unusable.

Tinctures: Liquid tinctures will be absorbed into inert waste materials such as soil, cat litter, or absorbent material prior to disposal.

Capsules: Capsules will be crushed and mixed with inert waste materials.

Suppositories: Suppositories will be melted or crushed and mixed with absorbent waste material.

Topicals: Creams, balms, or lotions will be mixed with absorbent waste materials until unusable.

DISPOSAL

After cannabis waste has been rendered unusable and unrecognizable, it will be disposed of in accordance with local solid waste regulations and applicable environmental laws.

DOCUMENTATION

All destruction activities will be recorded in the EVS tracking system and internal facility records. Records will include batch number, product type, quantity destroyed, destruction method, date of destruction, and the names of employees witnessing the destruction. All records will be retained for a minimum of five (5) years.

STANDARD OPERATING PROCEDURE

TITLE: Allergen Control for Edible Cannabis Products

SOP #: 012A

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

PURPOSE / POLICY

Procedures to prevent cross-contamination of allergens during edible cannabis production.

RESPONSIBILITIES

Quality Assurance identifies potential allergens in ingredients.

Production staff follow allergen control procedures.

Compliance staff maintain allergen documentation.

PROCEDURE

1. Review ingredient specifications for potential allergens.

2. Store allergen ingredients separately from non-allergen ingredients.

3. Clean and sanitize equipment before production runs.

4. Schedule production to minimize cross-contamination risks.

5. Clearly label products containing allergens.

6. Maintain cleaning logs and allergen control documentation.

STANDARD OPERATING PROCEDURE

TITLE: Employee Training Standards

SOP #: 013A

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

PURPOSE / POLICY

This procedure establishes employee training standards for the medical cannabis processing facility to ensure all personnel are properly trained in regulatory compliance, manufacturing procedures, safety practices, and quality control requirements.

RESPONSIBILITIES

• Management ensures all employees complete required training prior to performing job duties.

• Quality Assurance personnel maintain training records and verify competency.

• Employees must follow all SOPs and complete required training modules.

TRAINING REQUIREMENTS

Good Manufacturing Practices (GMP) and sanitation procedures.

Facility security procedures and restricted access policies.

Inventory tracking and EVS seed-to-sale compliance.

Standard Operating Procedures (SOPs) relevant to employee job duties.

Proper handling of cannabis materials and products.

Emergency procedures including fire safety and spill response.

Quality control and product safety requirements.

Equipment operation and maintenance procedures.

INITIAL TRAINING

All new employees must complete training prior to working in production areas. This includes review of all relevant SOPs, safety procedures, and regulatory compliance requirements.

ONGOING TRAINING

Employees will receive periodic refresher training to maintain compliance with regulatory standards and updates to procedures. Training updates will occur whenever SOPs are revised or new processes are introduced.

DOCUMENTATION

Training records including employee name, training topics, training dates, and instructor verification will be maintained for a minimum of five years and made available to regulatory authorities upon request.

STANDARD OPERATING PROCEDURE

TITLE: Independent Laboratory Testing Plan

SOP #: 014A

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

PURPOSE / POLICY

This procedure establishes the facility's plan for collecting representative samples of cannabis and cannabis products and submitting them to an independent licensed laboratory for testing to ensure products are safe for human consumption and comply with Utah medical cannabis regulations.

RESPONSIBILITIES

- Quality Assurance personnel coordinate sampling and testing activities.
- Production staff assist in preparing batches for sampling.
- Compliance staff ensure proper documentation and EVS tracking of samples.

SAMPLING PROCEDURES

Each production batch of cannabis products will be assigned a unique batch number and recorded in the EVS seed-to-sale tracking system.

A representative sample will be collected from each production batch prior to product release.

Sampling will follow sanitary procedures to prevent contamination.

Samples will be labeled with batch identification, date of collection, and product type.

Samples will be documented in a chain-of-custody log prior to transfer to the testing laboratory.

LABORATORY TESTING

Samples will be submitted to a state-approved independent cannabis testing laboratory.

Testing may include analysis for cannabinoid potency, pesticides, heavy metals, microbial contamination, mycotoxins, residual solvents (if applicable), and other contaminants required by Utah regulations.

Certificates of Analysis (COA) will be obtained for each tested batch and maintained in facility records.

PRODUCT RELEASE

Cannabis products will remain in quarantine until passing laboratory results are received. Quality Assurance personnel will review the Certificate of Analysis before approving product release for packaging, distribution, or sale.

FAILED TEST RESULTS

If a product fails laboratory testing, the batch will be placed in quarantine and evaluated for remediation or destruction according to the facility's Remediation SOP and Cannabis Product Destruction SOP.

RECORDKEEPING

All laboratory reports, chain-of-custody records, and batch documentation will be retained for a minimum of five years and made available to regulatory authorities upon request.

STANDARD OPERATING PROCEDURE

TITLE: Facility Sanitation and Hygiene

SOP #: 015A

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

PURPOSE / POLICY

This procedure establishes the sanitation and hygiene requirements for the cannabis processing facility to prevent contamination, ensure product safety, and comply with Utah Administrative Code R66-2 and GMP standards under 21 CFR Part 111.

RESPONSIBILITIES

Quality Assurance Manager oversees sanitation program implementation and compliance verification.

Production Technicians perform daily cleaning and sanitation tasks per assigned schedules.

All personnel follow personal hygiene requirements before entering production areas.

PROCEDURE

Daily Sanitation

All production surfaces, equipment, and utensils must be cleaned and sanitized before and after each production run. Food-grade sanitizers approved for cannabis processing must be used at manufacturer-recommended concentrations. Allow adequate contact time per sanitizer label instructions before rinsing.

Weekly Deep Cleaning

All production rooms must undergo deep cleaning weekly, including walls, floors, drains, ceilings, and ventilation covers. Equipment must be disassembled as needed for thorough cleaning of all contact surfaces.

Personal Hygiene Requirements

All personnel must wash hands thoroughly before entering production areas and after breaks. Clean smocks, hair nets, gloves, and shoe covers are required in all production zones. No jewelry, food, or beverages are permitted in production areas.

Sanitation Verification

Quality Assurance must conduct visual inspections before production begins. ATP swab testing or equivalent surface testing must be performed weekly on critical contact surfaces. Results must be documented and maintained for a minimum of three years.

Pest Control

An integrated pest management program must be maintained. Pest control inspections must be conducted monthly by a licensed pest control operator. All pest control activities must be documented.

RECORDKEEPING

All sanitation activities must be documented on the Daily Sanitation Log. Weekly deep cleaning must be documented with supervisor verification. ATP test results and pest control reports must be filed and retained per facility record retention policy.

STANDARD OPERATING PROCEDURE

TITLE: Document Control and Record Retention

SOP #: 016A

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

PURPOSE / POLICY

This procedure establishes the document control and record retention requirements for the cannabis processing facility to ensure all standard operating procedures, batch records, and compliance documents are properly created, reviewed, approved, distributed, and retained in accordance with Utah Administrative Code R66-2 and 21 CFR Part 111.

RESPONSIBILITIES

Quality Assurance Manager serves as the Document Control Coordinator responsible for maintaining the master document register and ensuring all documents are current.

Department Managers review and approve SOPs applicable to their areas of responsibility.

All personnel use only current, approved versions of documents and report any discrepancies.

PROCEDURE

Document Creation and Approval

All new SOPs must follow the facility SOP template format including title, SOP number, effective date, author, and approver fields. Draft documents must be reviewed by the applicable department manager and approved by the Quality Assurance Manager before implementation. Each document must be assigned a unique SOP number per the facility numbering convention.

Document Revision Control

All document revisions must be tracked with a revision history noting the date, author, description of changes, and approval. Obsolete versions must be removed from active use and archived. Only the current approved version may be available in production areas.

Document Distribution

Controlled copies of SOPs must be distributed to applicable work areas. Electronic copies stored in the facility document management system serve as the master copies. Uncontrolled copies must be clearly marked and are for reference only.

Record Retention

All batch production records must be retained for a minimum of three years from the date of manufacture. Quality assurance records, training records, and equipment calibration records must be retained for a minimum of three years. Regulatory correspondence and compliance documents must be retained for the life of the facility license.

RECORDKEEPING

A master document register must be maintained listing all controlled documents with current revision status. Document distribution logs must be maintained showing receipt acknowledgment. Annual document review schedules must be documented and tracked to completion.

STANDARD OPERATING PROCEDURE

TITLE: Equipment Calibration and Maintenance

SOP #: 017A

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

PURPOSE / POLICY

This procedure establishes the calibration and preventive maintenance requirements for all critical equipment used in cannabis processing operations to ensure measurement accuracy, product consistency, and regulatory compliance with Utah Administrative Code R66-2 and 21 CFR Part 111.

RESPONSIBILITIES

Quality Assurance Manager maintains the master equipment calibration schedule and verifies calibration status before production authorization.

Production Manager ensures equipment is available for scheduled calibration and maintenance activities.

Maintenance Technicians perform routine preventive maintenance and coordinate external calibration services as required.

PROCEDURE

Equipment Identification

All critical equipment must be assigned a unique equipment identification number and listed on the facility Equipment Register. Equipment requiring calibration includes scales, thermometers, pH meters, pressure gauges, and any measurement device used in production or quality control.

Calibration Schedule

All measurement equipment must be calibrated at manufacturer-recommended intervals or at minimum annually. Scales used for weighing ingredients must be calibrated daily before use with certified reference weights. Thermometers and temperature monitoring devices must be verified monthly against a NIST-traceable reference standard.

Calibration Procedures

Calibration must be performed using certified reference standards traceable to national standards. Equipment found out of calibration tolerance must be immediately removed from service, tagged out of service, and recalibrated before return to use. Any products manufactured using out-of-calibration equipment must be quarantined and evaluated by Quality Assurance.

Preventive Maintenance

All production equipment must follow the manufacturer-recommended preventive maintenance schedule. Maintenance activities must be documented including the date, technician, work performed, and parts replaced. Equipment must not be returned to production use until maintenance is verified complete and all safety checks are passed.

Out-of-Service Equipment

Equipment removed from service must be clearly tagged with an out-of-service label indicating the date and reason. Out-of-service equipment must not be used for any production activities until repaired, calibrated, and approved by Quality Assurance.

RECORDKEEPING

Individual equipment calibration records must be maintained for each piece of critical equipment. Preventive maintenance logs must be retained for the life of the equipment. Calibration certificates from external service providers must be filed with the equipment records. All records must be retained for a minimum of three years.

STANDARD OPERATING PROCEDURE

TITLE: Hemp Oil Transfer to Licensed Manufacturers

SOP #: 018A

EFFECTIVE DATE: 3/31/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

REGULATORY REFERENCE: Utah Code §4-41-103.1, §4-41-103.2, §4-41-104, §4-41-105; Utah Administrative Rule R66-30

PURPOSE

This SOP establishes the procedures for the lawful transfer of hemp oil (cannabinoid concentrate) from Origins to another UDAF-licensed cannabinoid product processor within the State of Utah, in compliance with Utah Code §4-41 (Hemp and Cannabinoid Act) and Utah Administrative Rule R66-30 (Industrial Hemp Program - Cannabinoid Product Processors), effective 8/7/2025.

SCOPE

This procedure applies to all Origins personnel involved in the preparation, dispatch, and documentation of hemp oil or cannabinoid concentrate shipments transferred to other licensed processors for further processing.

RESPONSIBILITIES

Operations Manager: Verify that both Origins and the receiving manufacturer hold current, valid UDAF Cannabinoid Processor Licenses prior to any transfer. Ensure all documentation is complete before product leaves the facility.

Production Technicians: Prepare product for transfer, assign lot numbers, confirm COA compliance, and package material for transport.

Quality Assurance: Confirm third-party lab COA results meet all THC thresholds before approving transfer. Retain all records for a minimum of three years.

Transport Personnel: Carry the complete transport manifest at all times during transit and present it upon request by UDAF officials or law enforcement.

PROCEDURE

1. LICENSE VERIFICATION (R66-30-13; Utah Code §4-41-103.2)
2. 1.1 Before initiating any transfer, confirm that Origins holds a current UDAF Cannabinoid Processor License with the appropriate tier for the material being transferred.
3. 1.2 Confirm the receiving manufacturer holds a current UDAF Cannabinoid Processor License (or USDA equivalent). Do not transfer to any unlicensed party.
4. 1.3 For concentrate containing above 0.3% THC: confirm both Origins and the receiving party are Tier One licensees operating within the State of Utah. Transfer of above-threshold concentrate across state lines is prohibited.
5. 1.4 Record both license numbers in the transfer log before proceeding.

2. PRE-TRANSFER PRODUCT TESTING (R66-30-9)

2.1 Ensure that a UDAF-approved third-party laboratory has tested the batch prior to transfer. Required test panels include: cannabinoid profile, residual solvents, pesticides, microbial contaminants, heavy metals, and foreign matter.

2.2 Obtain the completed Certificate of Analysis (COA) for each batch. The COA must reference the specific lot number of the batch being transferred.

2.3 Confirm the COA shows total THC and THC analog results are within the applicable thresholds:

- Standard transfer (all tiers): Total THC + THC analog must be less than 0.3%.
- - Tier One to Tier One or Tier Two in-state transfer only: concentrate above 0.3% THC is permitted, but must not exceed 20% total THC + THC analog concentration.
- 2.4 Do not proceed with any transfer if the COA is missing, expired, or shows non-compliant THC levels.

3. LOT NUMBER ASSIGNMENT AND RECORDS (R66-30-8)

3.1 Assign a unique identifying lot number to each batch included in the transfer.

3.2 Record in the facility log: lot number, quantity, date of transfer, and the receiving party's UDAF license number and contact information.

3.3 Attach the lot number to all documents accompanying the transfer, including the COA and bill of lading.

4. STORAGE CONFIRMATION BEFORE TRANSFER (R66-30-11)

4.1 If the concentrate to be transferred contains above 0.3% THC, confirm prior to loading that it has been stored in a secure, access-limited room, kept separate from all other hemp and cannabinoid products, and that a movement record has been maintained.

4.2 Document the date and time the material was removed from secure storage for transfer.

5. TRANSPORT MANIFEST PREPARATION (R66-30-12)

5.1 Prepare a transport manifest for every movement of industrial hemp material. The manifest must include all four of the following required elements:

- A copy of the COA for each batch (lot number) included in the shipment.
- - The full address (street number, street name, city, state, zip) of both the sending party (Origins) and the receiving party.
- - Proof of current UDAF Cannabinoid Processor License for both Origins and the receiving party, including license number and tier.
- - A bill of lading identifying the material, quantity, weight/volume, and transport vehicle information.
- 5.2 The transport manifest must travel with the shipment at all times during transit.
- 5.3 Transport personnel must present the manifest upon request by UDAF officials or law enforcement.

6. TRANSFER RESTRICTIONS (R66-30-13; Utah Code §4-41-105)

7. 6.1 Do not transfer hemp oil to any person not licensed by UDAF or the USDA.

8. 6.2 Do not transfer living plants, viable plants, or viable seed under this procedure.
9. 6.3 Do not transfer concentrate containing 0.3% or more THC across state lines under any circumstances.
10. 6.4 Do not transfer material from or to an out-of-state party who is not authorized under their own state's laws.
11. 6.5 Do not process or handle industrial hemp material received from an unlicensed source.

7. DISPATCH AND TRANSIT

7.1 Load the transfer vehicle only after the transport manifest is complete and verified.

7.2 Ensure transport personnel have a copy of the manifest and can present it at any time.

7.3 Transport hemp oil in sealed, properly labeled containers that clearly identify the lot number and contents.

7.4 If a discrepancy or compliance issue is discovered during transit, halt the transfer and contact the Operations Manager immediately before proceeding.

8. RECEIVING FACILITY CONFIRMATION

8.1 Upon confirmation of delivery from the receiving facility, verify they have received all manifest documents.

8.2 Obtain acknowledgment of receipt from the receiving party including the date received, quantity confirmed, and their signature or written confirmation.

8.3 File the confirmed delivery receipt with the transfer records.

9. RECORD KEEPING (R66-30-8)

9.1 Retain the following records for a minimum of three years for each transfer:

- Date of transfer
- - Lot number(s) transferred
- - Quantity and weight/volume transferred
- - Receiving party name, UDAF license number, and contact information

- - Copy of the transport manifest
- - Copy of the COA for each batch
- - Bill of lading
- - Delivery confirmation from receiving party
- 9.2 All records are subject to review by UDAF officials at any inspection or upon request (R66-30-8(6)).

10. PRODUCT REGISTRATION (Utah Code §4-41-104)

10.1 If the transferred hemp oil will be distributed in Utah as part of a finished cannabinoid product, confirm the product or product class is registered with UDAF before distribution.

10.2 Product registration is annual and is completed through the UDAF Agriculture Information Management System (AIMS) portal at ag.utah.gov.

11. NON-COMPLIANCE AND ENFORCEMENT

11.1 UDAF has authority to conduct random testing of cannabinoid products and materials at any time (R66-30-9, R66-30-10).

11.2 Any batch with a test result above 0.3% THC that is not authorized for above-threshold transfer shall be placed on hold and not transferred until resolved with UDAF.

11.3 UDAF may seize and destroy non-compliant material (Utah Code §4-41-105(3)).

11.4 Unlawful transfer of non-compliant material is subject to fines, citation, and potential license revocation under Utah Code §4-41-106.

11.5 Report any compliance issue, failed test, or enforcement action to the Operations Manager and Quality Assurance immediately.

KEY CONTACTS

UDAF Hemp Licensing: (385) 524-8570 | hemp-licensing@utah.gov

UDAF Hemp Program Specialist: (385) 226-7316 | hemp_udaf@utah.gov

UDAF General: (801) 982-2200 | ag.utah.gov

AIMS Licensing Portal: ag.utah.gov > Specialized Products > Industrial Hemp

DOCUMENT CONTROL

This SOP shall be reviewed annually and updated whenever changes occur to Utah Code §4-41, Utah Administrative Rule R66-30, or UDAF program guidance. Regulatory references are current as of 3/31/2026. Note: Proposed 2026 General Session legislation (H.B. 389, H.B. 469) may amend applicable statutes. Verify currency with UDAF or legal counsel before relying on this document.

STANDARD OPERATING PROCEDURE

TITLE: Master Batch Record & Production Documentation

SOP #: 005Z

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

PURPOSE / POLICY

This procedure establishes requirements for the creation, completion, review, and retention of Master Batch Records (MBRs) and associated production documentation to ensure consistent manufacturing, traceability, and regulatory compliance for all cannabis products produced at the facility.

RESPONSIBILITIES

[redacted]

PROCEDURE

[redacted]

[redacted]

SOP ADDENDUM – MASTER BATCH RECORD REFERENCE

EFFECTIVE DATE: 1/1/2026

WRITTEN BY: [redacted]

APPROVED BY: [redacted]

This addendum applies to all manufacturing Standard Operating Procedures. All product formulations, ingredient quantities, and detailed processing parameters are maintained within the approved Master Batch Record (MBR) for each product.

[redacted]

[redacted] manufacturing activities and record all production data within the batch record."

This applies to the following SOP categories:

[redacted]

NEW PRODUCT SOP CREATION GUIDE

Prepared By: [redacted] | Effective Date: 3/31/2026 | Version: 1.0

PURPOSE: This guide defines every document and system that must be created or updated whenever a new product type is added to Origins' manufacturing program. Following this checklist ensures regulatory compliance with Utah R66-2, maintains accurate licensing documentation, and keeps all internal records current.

STEP 1 – CREATE THE PRODUCT SOP DOCUMENT

[redacted]

[redacted]

[redacted]

Docusign Envelope ID: F9C3137B-93F2-478F-A55A-67473577A00C

GRAMA Claim of Business Confidentiality

Pursuant to Utah Code Section 63G-2-305(1) and (2), and in accordance with Section 63G-2-309, High Road Delivery dba Kivo (company name) asserts a claim of business confidentiality to protect the following information submitted as part of a Request for Proposals.

- [X] non-public financial statements
- [X] specific employee name and contact information
- [X] specific customer information, client lists, or subscription lists
- [X] other (specify):

Proprietary delivery logistics and routing methodologies; standard operating procedures (SOPs); dispatch and fleet management processes; staffing models and driver management structures; pricing models and revenue share frameworks; operational workflows; training materials; and any supporting documentation reflecting internal business strategy or execution.

This claim is asserted because this information requires protection as it includes:

[X] trade secrets as defined in Utah Code Section 13-24-2 ("Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, or process, that: (a) derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and (b) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.)

[X] commercial information or non-individual financial information obtained from a person if: (a) disclosure of the information could reasonably be expected to result in unfair competitive injury to the person submitting the information or would impair the ability of the governmental entity to obtain necessary information in the future; [and] (b) the person submitting the information has a greater interest in prohibiting access than the public in obtaining access.

Following is a concise statement of reasons supporting the claim of business confidentiality:

The information identified above contains proprietary business methods, operational processes, and commercial strategies developed by High Road Delivery through significant time, experience, and investment. This includes, but is not limited to, delivery logistics models, routing methodologies, staffing structures, pricing frameworks, and standard operating procedures.

This information is not publicly available and derives independent economic value from remaining confidential. Disclosure of this information would provide competitors and other market participants with insight into High Road Delivery's operational approach and strategic positioning, resulting in potential competitive harm.

High Road Delivery takes reasonable measures to protect the confidentiality of this information and limits its dissemination internally and externally. The company has a greater interest in maintaining the confidentiality of this information than the public has in accessing it, as disclosure would impair its ability to compete effectively and could negatively impact future business opportunities.

Signed: Signed by: 09EFFB3FFD4348E...

On behalf of (company): High Road Delivery dba Kivo

Date: 4/8/2026

Filed in the Office of	Filing Number
Scott Whittaker	**260211813084B**
	Filed On
	February 11, 2026
Director, Division of Corporations and Commercial Code	Entity Number
	14660516-0161
	Number of Pages
Filed in the State of Utah	2

State of Utah
Department of Commerce
Division of Corporations and Commercial Code

Foreign Limited Liability Company - Foreign Registration Statement

ENTITY INFORMATION

Entity Name: High Road Delivery LLC

[redacted]

Effective Date: **February 11, 2026**

Effective Time: **08:52 AM**

BUSINESS DETAILS

Duration Date: Perpetual

BUSINESS CLASSIFICATION:
Foreign Limited Liability Company

FOREIGN DETAILS
Jurisdiction
Country: USA
State: MD
Federal Employer Identification Number: [redacted] **FEIN Status:** Received
Purpose Statement: The purpose of the entity is to provide compliant cannabis delivery, logistics, and related operational services to licensed cannabis businesses in accordance with all applicable state and local laws and regulations.

[redacted]

FOREIGN OFFICE STREET INFORMATION:
Foreign Business Address: UT
Foreign Mailing Address: UT

REGISTERED AGENT
Agent Type: Individual

[redacted]

ACTIVE PRINCIPAL INFORMATION
Title: Manager
[redacted]

REQUIRED SIGNATURES

- I declare that the information contained in this electronic submission is true and accurate.
- I affirm that I am legally authorized to sign this document.
- I acknowledge receipt of the below information:
    - The information provided in this form will be used by the Division to evaluate and complete your request. Failure to provide complete information as requested will result in the denial of your request as incomplete.
    - Information provided in this form is retained in accordance with state record retention laws. For specific information about the records retention for this form, please visit https://corporations.utah.gov/records/.
    - In order to comply with legal and regulatory requirements, we may share information provided in this form with authorized parties such as other government agencies, national licensing databases, contracted vendors, etc. Additionally, many items collected by the Division are classified as "public" under the Government Records Access and Management Act, Utah Code § 63G-2-101 et seq.
    - For more information on how the information you provide is shared, please refer to https://corporations.utah.gov/records/.
- I acknowledge that the debts, liabilities, and obligations incurred, contracted for, or otherwise existing with respect to a particular series, if any, are enforceable against the assets of such series only, and not against the assets of the foreign limited liability company generally or any other series.

- **Electronic Signature:** Jennifer Snowden
  Title/Capacity: Authorized Person

Delivery Standard Operating Procedures - Utah

Version #1 - February 18, 2026

ROLE

1) **Dispatcher** - High Road team member, the person who manages orders, drivers and communication between Customers and dispensaries.
2) **Driver** - High Road team member, licensed courier to deliver on behalf of the dispensary. The person who delivers the order to customers.
3) **Dispensary** - The licensed pharmacy / retailer whose products Driver will deliver.

TIMING

Delivery Windows: TBD
Monday - Saturday:
Sunday:

DELIVERY HOURS

The delivery process will be available for customers to place online orders at any time. Customers are notified of the Dispensary operating hours and that orders placed outside of normal operating hours will be delivered next day or as scheduled. Dispensary and High Road will establish delivery hours cut-off times for orders. All deliveries must legally take place between 6am-10pm.

PURPOSE

NOTE: THE FOLLOWING STANDARD OPERATING PROCEDURES FOR

DELIVERY ARE SUPPLEMENTAL TO ANY EXISTING STANDARD OPERATING PROCEDURES PREVIOUSLY ADOPTED AND APPROVED BY THE DISPENSARY AND APPROPRIATE REGULATORY AGENCIES.

The delivery process starts when a Customer initiates an order online via the Dispensary's website. This SOP details every step in the delivery process, including customers placing orders, dispatchers processing order payments, drivers delivering orders, and customers receiving orders.

CUSTOMER PROCESS FOR PLACING ORDERS

This process outlines how customers/Customers place orders for delivery.

[redacted]

DISPENSARY PROCESS FOR FULFILLING ORDERS

This process starts the moment a customer places an order, whether online, over the phone, or by another means.

[redacted]





PROCESS FOR DELIVERY

[redacted]

PROCESS FOR CANCELED/UNSUCCESSFUL DELIVERY

There are a few reasons for an order to not be successful. Drivers shall take the following steps for each of the reasons:



[redacted]

THEFT, LOSS OF PRODUCT, OR SUSPECTED CRIMINAL ACTIVITY

[redacted]

[redacted]

TRANSPORTATION VEHICLE STORAGE

[redacted]

[redacted]

[redacted]

[redacted] **Utah**

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

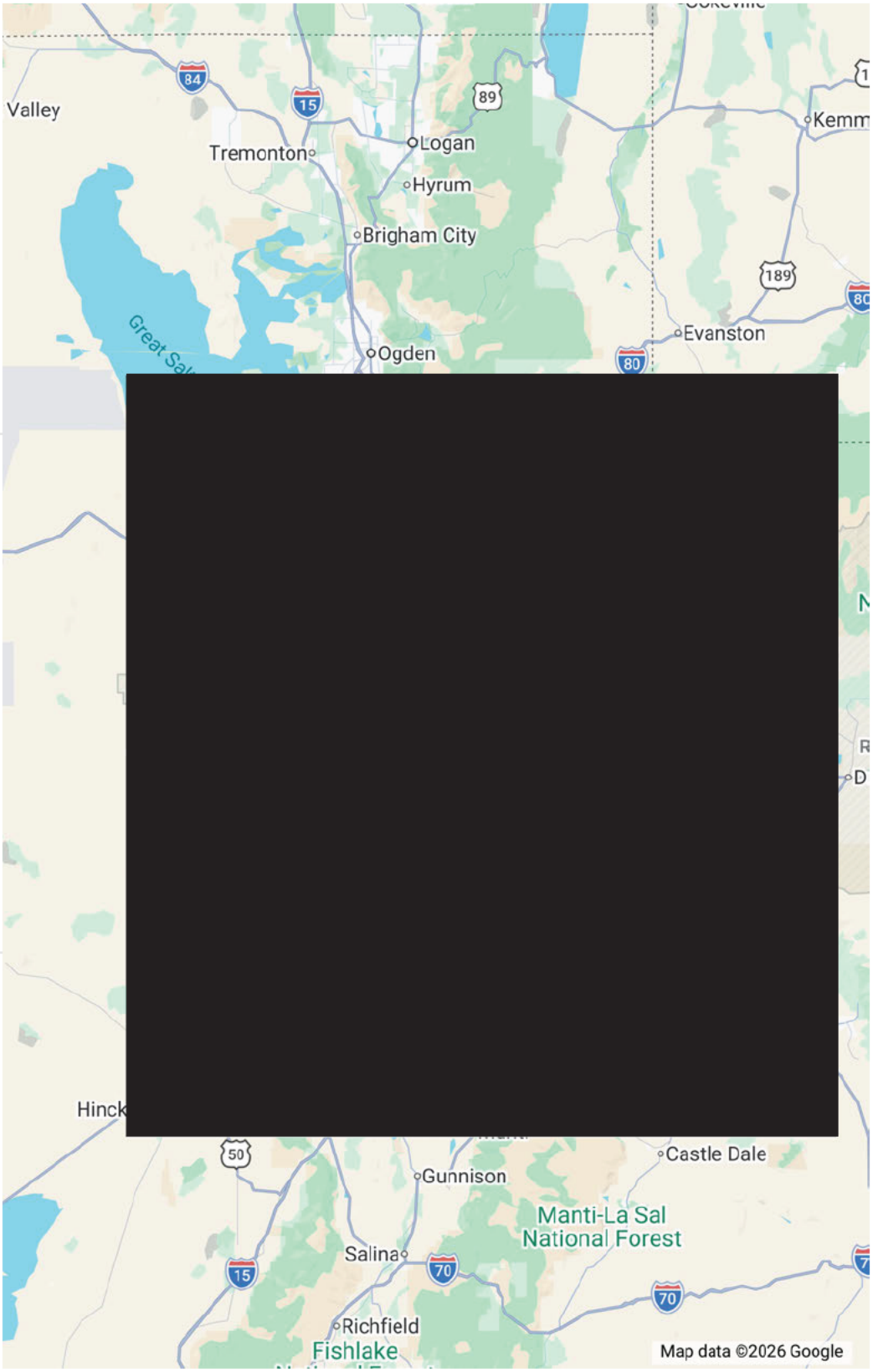
[redacted]

[redacted]

[redacted]

[redacted]

[redacted]



HIGH ROAD DELIVERY LLC

D.B.A. Kivo

UTAH MEDICAL CANNABIS COURIER OPERATING PLAN

Submitted to: Utah Department of Agriculture and Food

Pursuant to Utah Code Title 4, Chapter 41a and Utah Admin Rule R66

Date: February 24, 2026

SECTION 1 – BUSINESS DOCUMENTS & INFORMATION

Legal Name: High Road Delivery LLC

Entity Type: Maryland LLC registered as a Foreign LLC in Utah (Appendix A)

D.B.A: Kivo

Mailing Address: [redacted]

Primary Contact: Jennifer Snowden, CEO

Phone: [redacted]

Email: jennifer@highroaddelivery.com

High Road Delivery LLC dba Kivo acknowledges that licensure as a medical cannabis courier is governed by Utah Code Title 4, Chapter 41a (Utah Medical Cannabis Act) and Utah Administrative Rule R66, as amended from time to time. High Road Delivery LLC dba Kivo affirms that it has reviewed, understands, and agrees to comply with all applicable statutory and regulatory requirements, including any future amendments, guidance, or directives issued by the Utah Department of Agriculture and Food. High Road Delivery LLC dba Kivo further acknowledges the Department's authority to inspect, audit, and enforce compliance, and understands that failure to adhere to applicable law and rule may result in disciplinary action, including suspension or revocation of licensure.

SECTION 2 – ORGANIZATION INFORMATION

Pursuant to Utah Code §4-41a and applicable provisions of Utah Administrative Rule R66, High Road Delivery LLC dba Kivo hereby provides a complete disclosure of all individuals and entities holding a direct or indirect ownership or financial interest in the company. This disclosure includes all persons with a ten percent (10%) or greater ownership or voting interest, as well as those who possess the authority to direct, manage, or control the operations of the entity. High Road Delivery LLC dba Kivo affirms that the ownership structure described below is accurate, complete, and reflects all individuals and entities with reportable interests under Utah law.

- Jennifer Snowden – [redacted]
- Merida Capital – [redacted]

- Other Ownership:

[redacted]

Operational Control in Utah: Jennifer Snowden, CEO

[redacted]

Email: jennifer@highroaddelivery.com

Credentials and Experience

Jennifer Snowden

Chief Executive Officer & Majority Owner [redacted]
High Road Delivery LLC

Jennifer Snowden is the Chief Executive Officer and majority owner of High Road Delivery LLC. She has over a decade of experience in regulated cannabis operations, with particular expertise in last-mile logistics, compliance oversight, multi-state regulatory navigation, and delivery program implementation.

Ms. Snowden has led the development and operation of cannabis delivery systems in multiple highly regulated jurisdictions, including markets requiring integration with licensed dispensaries, inventory control systems, and state regulatory tracking platforms. Her responsibilities have included contract negotiation with licensed operators, regulatory application preparation, compliance protocol development, training program creation, operational risk management, and technology integration for secure transport and real-time delivery monitoring.

She has extensive experience working within state-specific cannabis statutes and administrative rules and has overseen the creation of standard operating procedures designed to ensure chain-of-custody integrity, driver accountability, and adherence to strict transport and reporting requirements. As CEO, Ms. Snowden maintains ultimate authority over compliance, operational decision-making, and regulatory communications for High Road Delivery LLC.

Merida Capital

Minority Owner [redacted]

Merida Capital is a private equity investment firm specializing in the regulated cannabis industry. Founded in 2016, Merida Capital has invested in a diversified portfolio of licensed cannabis operators and ancillary service providers across multiple U.S. jurisdictions.

Merida Capital brings institutional-level investment experience, financial oversight expertise, and industry-specific knowledge of regulated cannabis markets. The firm has experience evaluating compliance structures, regulatory risk, operational scalability, and governance practices within state-licensed cannabis businesses.

Merida Capital does not participate in the day-to-day management or operational control of High Road Delivery LLC. Its role is limited to that of a passive minority investor, with no direct authority over daily courier operations or regulatory compliance decisions in Utah.

SECTION 3 – PHYSICAL FACILITIES AND DELIVERY VEHICLE DESCRIPTION

A. Physical Facility Description

High Road Delivery LLC dba Kivo does not maintain a physical cannabis storage facility within the State of Utah.

The company does not lease, own, or operate any warehouse, vault, distribution center, or storage location for medical cannabis within Utah. [redacted]

- Prepared, packaged, and sealed by the licensed medical cannabis pharmacy;
- Released directly to a licensed courier agent;
- Delivered within scheduled delivery windows; and
- Returned to the originating pharmacy the same day if undeliverable.

No medical cannabis is stored overnight in vehicles, residences, offices, or any other location operated or controlled by High Road Delivery.

Because High Road does not operate a cannabis storage facility in Utah, no floor plan or architectural elevation is applicable. All physical storage, inventory control, and product security prior to transfer to the courier remain under the responsibility and control of the licensed medical cannabis pharmacy.

Administrative oversight functions are conducted remotely and do not involve the storage or handling of cannabis products.

B. Delivery Vehicle Description and Physical Characteristics

High Road Delivery will utilize [redacted] vehicles during initial operations. Vehicles will consist of:

- Sedans
- Sport Utility Vehicles (SUVs)
- Fully enclosed passenger vehicles

All vehicles used for transport will meet the following physical standards:

1. Fully enclosed passenger vehicles with locking doors and secure trunk compartments.
2. Operational factory-installed locking systems.
3. No external markings indicating cannabis transport.
4. No signage or branding that would identify the vehicle as carrying medical cannabis.

Vehicles will be registered with High Road Delivery and reported to the Utah Department of Agriculture and Food upon request, including:

- Make
- Model
- Year
- Color
- Vehicle Identification Number (VIN)
- License Plate Number

C. Vehicle Interior Security Configuration

To ensure compliance with Utah Code §4-41a and Utah Admin Rule R66 transport requirements, each vehicle will be outfitted as follows:

1. Secure Transport Container

All medical cannabis shipments will be transported inside:

- A fully enclosed, rigid lockbox constructed of metal or reinforced composite material;
- Equipped with a keyed or combination locking mechanism;
- Not visible from outside the vehicle.

2. Tethering and Immobilization

The lockbox will be:

- Secured to the vehicle frame using a high-tensile locking cable or steel tether;
- Anchored to a fixed structural component within the trunk or rear cargo area;
- Positioned to prevent removal without unlocking or cutting the tether.

This prevents quick removal in the event of theft or vehicle breach.

3. Placement Within Vehicle

The secured lockbox will be stored:

- Inside the trunk of the vehicle; or
- In a rear cargo area not accessible to the public compartment; and
- Never in plain view.

If placed in the rear passenger area due to vehicle configuration, the box will be:

- Secured behind the driver seat;
- Windows tinted consistent with Utah vehicle regulations; and
- Not visible from outside the vehicle.

D. Temperature Control and Product Integrity

To preserve product integrity during transport:

- An insulated cooler will be placed inside the lockbox;
- Temperature stability will be maintained consistent with manufacturer labeling;
- Drivers are trained to avoid exposure to extreme heat or cold;
- Vehicles must maintain functional climate control systems.

Drivers are instructed to keep vehicles climate-controlled while in possession of product and to avoid prolonged vehicle shutdown in extreme temperatures.

A complete copy of the medical cannabis courier's employee training standards can be found in Appendix B

SECTION 4 – CONTRACTED MEDICAL CANNABIS PHARMACIES & SERVICE AREAS

Pursuant to Utah Code §4-41a-1201, High Road Delivery LLC dba Kivo operates solely as a licensed medical cannabis courier contracting with licensed Utah home delivery medical cannabis pharmacies for the purpose of transporting medical cannabis shipments to fulfill lawful electronic orders.

High Road Delivery does not independently sell, warehouse, or distribute medical cannabis. All medical cannabis transported by High Road remains under the ownership and inventory control of the originating licensed pharmacy until delivery is completed.

A. Initial Contracted Pharmacy Partner

High Road Delivery has executed delivery service agreements with the following licensed Utah medical cannabis pharmacy:

[redacted]

- [redacted]
- [redacted]
- [redacted]

[redacted]

These agreements authorize High Road Delivery to perform home delivery services in accordance with Utah Code §4-41a and Utah Administrative Rule R66.

B. Service Area & Geographic Coverage

High Road Delivery will provide courier services within the geographic service areas designated by each contracted pharmacy.

The anticipated service coverage area for initial operations is statewide, subject to pharmacy-defined delivery zones and route structuring.

A detailed delivery coverage map is provided in Appendix C.

Service areas may be refined based on:

- Pharmacy direction
- Patient density
- Operational logistics
- Regulatory guidance

C. Operating Schedule

High Road Delivery will operate:

- Seven (7) days per week
- Delivery hours strictly between 6:00 a.m. and 10:00 p.m., in full compliance with Utah Administrative Rule R66.

All route scheduling will be structured to ensure:

- Final delivery attempts occur no later than one hour prior to pharmacy closing;
- Sufficient time remains to return undelivered products to the originating pharmacy the same day.

D. Estimated Delivery Volume

During initial operations, High Road Delivery anticipates:

- [redacted].

Actual delivery volume may fluctuate based on patient demand, pharmacy capacity, and regulatory limits.

E. Future Pharmacy Expansion

The [redacted] represent High Road Delivery's initial contracted pharmacy relationships in Utah.

High Road Delivery anticipates the potential to expand its courier services to additional licensed Utah medical cannabis pharmacies as permitted under Utah law.

Prior to commencing delivery services for any additional pharmacy:

1. A written service agreement will be executed with the licensed pharmacy;
2. Operational protocols will be reviewed to ensure alignment with Utah Code §4-41a and Utah Admin Rule R66;
3. High Road Delivery will update its operating records and internal compliance documentation accordingly;
4. The Utah Department of Agriculture and Food will be notified of the additional contracted pharmacy relationship as required by applicable rule or Department directive.

High Road Delivery understands that any material operational expansion, including the addition of contracted pharmacies or significant changes in service area, may require notice to or approval from the Department, and the company agrees to provide timely written notification consistent with regulatory requirements.

SECTION 5 – Agent Card Tracking and Active Employee Registry

Pursuant to Utah Code §4-41a and Utah Administrative Rule R66, High Road Delivery LLC dba Kivo requires that all individuals handling, transporting, or otherwise possessing medical cannabis hold a valid Utah Medical Cannabis Courier Agent Card prior to engaging in any courier activity.

A. Pre-Assignment Verification

Before a driver is authorized to transport medical cannabis, High Road Delivery will:

1. Verify issuance of a valid Utah Courier Agent Card;

2. Confirm the card's expiration date;

3. Confirm that the agent card classification matches courier authorization;

4. Retain a digital copy of the agent card in the company's secure compliance database.

No driver will be scheduled for deliveries until this verification process is completed.

B. Active Agent Registry

High Road Delivery maintains a secure, continuously updated Active Agent Registry, which includes:

- Full legal name of agent
- Agent card number
- Expiration date
- Contact information
- Status (Active / Inactive)
- Assigned vehicle (if applicable)
- Date of onboarding
- Date of termination (if applicable)

This registry is maintained electronically by the Chief Operating Officer and reviewed on a recurring basis to ensure no expired credentials remain active.

C. Ongoing Monitoring

High Road Delivery conducts:

- Monthly internal compliance audits of agent card expiration dates;
- Immediate deactivation of any agent whose card has expired, been suspended, or revoked;
- Automated reminders to agents 30 days prior to expiration.

Drivers with expired credentials are immediately removed from delivery assignments.

D. Provision to the Department

Upon request from the Utah Department of Agriculture and Food, High Road Delivery will provide:

- A current list of all active courier agents;
- Agent card numbers and expiration dates;
- Vehicle assignment information (if requested).

The company will provide this information within twenty-four (24) hours of a Department request unless otherwise specified.

E. Change Reporting

High Road Delivery understands its obligation to notify the Department of material changes affecting licensed operations and will promptly report any systemic changes to its staffing structure or agent classification as required under Utah law.

SECTION 6 – STORAGE, TRANSPORT, SECURITY & VEHICLE CONTROL PROTOCOLS

Pursuant to Utah Code Title 4, Chapter 41a and Utah Administrative Rule R66, High Road Delivery LLC dba Kivo establishes the following protocols to ensure that medical cannabis shipments are transported in a manner that preserves product integrity, maintains sanitation, and protects against diversion, theft, or unauthorized access.

I. STORAGE AND DELIVERY PROTOCOLS

A. Operating Model – [redacted]

[redacted]

- Medical cannabis shipments are prepared, packaged, and sealed by the licensed medical cannabis pharmacy.

- Courier agents collect shipments pursuant to a pharmacy-generated manifest.
- Deliveries are completed within designated route windows.
- Any undelivered product is returned to the originating pharmacy the same business day.
- Medical cannabis is not stored overnight in vehicles, residences, offices, or any location controlled by High Road Delivery.

This model minimizes risk and eliminates long-term courier storage exposure.

B. Sanitation & Product Integrity Protocols

To preserve the integrity of medical cannabis during transport:

1. Courier agents handle only sealed pharmacy-prepared packages.
2. Packages remain unopened and unaltered during transport.
3. Shipments are placed inside an enclosed lockbox prior to vehicle departure.
4. Insulated containers are used inside the lockbox to reduce exposure to heat or cold.
5. Vehicles must maintain functional climate control systems.
6. Drivers are trained to avoid leaving vehicles in extreme environmental conditions.
7. Lockboxes are cleaned and inspected regularly to maintain sanitary transport conditions.

Drivers are prohibited from:

- Opening packages
- Repackaging product
- Modifying packaging
- Exposing product to direct sunlight
- Storing product alongside contaminants

II. STORAGE UP TO TEN (10) DAYS – CONTINGENCY PROTOCOL

Although Utah Administrative Rule R66 allows limited courier storage under certain conditions, High Road Delivery does not utilize long-term storage as part of its standard operating model.

However, if extraordinary circumstances require temporary holding of product (e.g., weather emergency, road closure, natural disaster), the following controls apply:

1. Product may only be held in a secured, enclosed lockbox.
2. The lockbox must remain tethered to a secured vehicle frame or locked within a controlled access area.
3. Product may not be held overnight without written notification to the originating pharmacy.
4. If holding exceeds twenty-four (24) hours, the pharmacy will be notified immediately.
5. If extended storage approaches regulatory limits, High Road will notify the Utah Department of Agriculture and Food as required.
6. All product remains listed on the original manifest and reconciled through the pharmacy Inventory Control System (ICS).

Under no circumstances will product be stored in a private residence or unsecured location.

III. VEHICLE DESCRIPTION & SECURITY CONTROLS

A. Vehicle Types

High Road Delivery will utilize [redacted] vehicles during initial operations, consisting of:

- Sedans
- Sport Utility Vehicles (SUVs)
- Fully enclosed passenger vehicles

All vehicles must:

- Have fully functioning door locks
- Have secured trunk or cargo compartments
- Be free from external cannabis identification markings

- Be in good mechanical condition

B. Fully Enclosed Secure Container Requirement

All medical cannabis transported will be placed in:

- A rigid, fully enclosed lockbox constructed of reinforced material;
- Equipped with keyed or combination lock;
- Not visible from outside the vehicle.

The lockbox will be:

- Secured inside the trunk or rear cargo area;
- Tethered using a high-strength steel cable or anchoring device to the vehicle's structural frame;
- Positioned to prevent quick removal.

This satisfies the requirement that cannabis be transported in a fully enclosed box or container secured inside the vehicle.

C. Temperature Integrity Controls

To preserve product integrity:

- An insulated cooler is placed inside the lockbox;
- Climate control within the vehicle must remain operational;
- Drivers are trained to avoid prolonged shutdown of the vehicle during extreme temperatures;
- Routes are structured to minimize unnecessary delays.

IV. UNATTENDED VEHICLE PROTOCOL

Medical cannabis shall not remain unattended in a vehicle for more than sixty (60) minutes.

If a driver must exit the vehicle:

1. Vehicle doors must be locked.

2. Lockbox must remain secured and tethered.
3. Driver must maintain reasonable proximity.
4. Dispatch must be notified if absence approaches 60 minutes.

Drivers are instructed that extended unattended vehicle time is prohibited except in emergency situations.

If a delay beyond 60 minutes becomes unavoidable due to emergency:

- Dispatch must be notified immediately;
- A supervisory review will occur;
- Product may be retrieved by another licensed courier agent if necessary.

Under no circumstances will product remain unattended overnight.

V. VEHICLE INFORMATION REPORTING TO UDAF

High Road Delivery maintains a centralized Vehicle Registry containing:

- Vehicle Make
- Model
- Year
- Color
- Vehicle Identification Number (VIN)
- License Plate Number
- Assigned Courier Agent
- Insurance Verification Status

This registry is maintained electronically by management.

Upon request from the Utah Department of Agriculture and Food, High Road Delivery will provide updated vehicle information within twenty-four (24) hours.

High Road Delivery will also update internal records whenever a vehicle is added, removed, or reassigned.

VI. DELIVERY-SPECIFIC SECURITY PLAN

A. Communication & Monitoring Plan

While transporting medical cannabis:

- Drivers must remain logged into the secure Delivery Management System.
- Real-time GPS tracking is active at all times.
- Dispatch monitors routes continuously.
- Idle alerts are triggered if a vehicle remains stationary beyond defined thresholds.

Escalation Protocol:

1. Dispatcher sends electronic communication.
2. If no response within three (3) minutes, dispatcher calls driver.
3. If still no response, dispatcher contacts local law enforcement.
4. Incident is documented.

Drivers are trained in use of a discreet distress signal protocol.

B. Theft & Security Breach Procedure

If theft, attempted theft, tampering, or suspicious activity occurs:

1. Driver prioritizes personal safety.
2. Immediately contacts 911.
3. Notifies dispatch.
4. Dispatch notifies pharmacy supervising PMP.
5. Department notified within 24 hours.
6. Police report obtained.
7. Incident documented in ICS.
8. Written internal incident report completed.

Drivers are unarmed and instructed never to resist robbery.

C. Accident Procedure

If vehicle accident occurs:

1. Driver ensures personal safety.
2. Contact emergency services if necessary.
3. Notify dispatch immediately.
4. Secure vehicle and lockbox.
5. Do not release product.
6. If vehicle disabled:
    - Another licensed courier retrieves product.
7. Pharmacy notified immediately.
8. Incident documented and reconciled.

VII. VEHICLE OCCUPANCY RESTRICTION

While medical cannabis is present in the vehicle:

- Only licensed pharmacy agents or licensed courier agents may occupy the vehicle.
- No unauthorized passengers are permitted.
- Drivers may not transport family members, friends, or unrelated individuals during active transport.

SECTION 7 – DELIVERY OPERATIONS, MANIFEST CONTROL, ID VERIFICATION & REPORTING PROCEDURES

I. COURIER AGENT IDENTIFICATION REQUIREMENT

Pursuant to Utah Code §4-41a and Utah Admin Rule R66, all courier agents must clearly identify themselves to the cardholder at the time of delivery.

Procedure:

1. Each courier agent shall possess a valid Utah Medical Cannabis Courier Agent Card.
2. Each courier agent shall wear:
    - A visible company-issued identification badge; and
    - Have their state-issued agent card readily accessible for inspection.
3. Upon arrival at a delivery location, the courier agent must:
    - Verbally identify themselves as a licensed medical cannabis courier;
    - Present identification upon request;
    - Confirm the originating pharmacy.

Failure to display proper identification results in immediate removal from active delivery duty.

II. MANIFEST CREATION, CONTROL & VERIFICATION

A. Manifest Creation

Manifests are created exclusively by the licensed home delivery medical cannabis pharmacy through its Inventory Control System (ICS), in accordance with Utah regulatory requirements.

Each manifest includes:

- Pharmacy name
- Courier agent name
- Vehicle information
- Date and time of departure
- Anticipated route
- Customer name
- Delivery address
- Product description and quantity

High Road Delivery does not create or alter manifests.

B. Pre-Departure Verification

Before departing the pharmacy:

1. Courier agent reviews the manifest.
2. Courier agent verifies:
    - Correct customer name
    - Correct address
    - Product quantity
    - Manifest identification number
3. Courier agent signs out the order on the pharmacy log sheet.
4. Courier agent activates route in Delivery Management System.

No product may be transported unless it appears on the manifest.

C. Transport Control

During transport:

- Digital manifest remains accessible to courier agent.
- Dispatch monitors route progress.
- No product substitution, modification, or addition is permitted.
- If discrepancy is identified, courier must immediately contact dispatch and pharmacy.

Transporting any product not listed on the manifest is strictly prohibited.

III. PROCEDURE FOR MISSING ITEMS OR LOSS OF PRODUCT

If any product is lost, stolen, tampered with, or otherwise unaccounted for:

1. Courier immediately notifies dispatch.

2. Dispatch immediately notifies the originating pharmacy.
3. The pharmacy supervising PMP is notified within 24 hours.
4. Local law enforcement is notified immediately if theft or criminal activity is suspected.
5. Utah Department of Agriculture and Food is notified within 24 hours.
6. Incident is documented in writing.
7. Product discrepancy is logged into the pharmacy's Inventory Control System.

Courier agents are instructed never to conceal or delay reporting of any discrepancy.

IV. RECORD KEEPING IN INVENTORY CONTROL SYSTEM (ICS)

All medical cannabis inventory remains under the pharmacy's ICS.

High Road Delivery ensures accountability by:

- Transporting only products listed on manifest.
- Requiring return reconciliation for all undelivered items.
- Maintaining digital proof of delivery (timestamp, GPS, signature).
- Providing documentation to pharmacy for ICS reconciliation.

If product is returned:

- Pharmacy confirms return in ICS.
- Courier signs return log.
- Discrepancies are reconciled immediately.

High Road does not independently maintain inventory ownership records but cooperates fully in reconciliation.

V. REAL-TIME TRACKING SYSTEM

High Road utilizes a secure cloud-based Delivery Management System that provides:

- Real-time GPS vehicle tracking

- Route mapping
- Timestamped delivery logs
- Idle time alerts
- Two-way communication
- Photo documentation
- Digital audit trail

Drivers must remain logged into the system at all times while in possession of medical cannabis.

Dispatch monitors routes continuously and initiates escalation protocol for irregular activity.

VI. IDENTITY VERIFICATION POLICY

To ensure delivery to the correct cardholder or caregiver:

Upon arrival:

1. Courier requests:
    - Government-issued photo ID
    - Valid Utah Medical Cannabis Card (or caregiver authorization)
2. Courier verifies:
    - Name matches manifest
    - Date of birth matches
    - Card validity
3. Courier photographs ID and signed delivery receipt in Delivery Management System.
4. Courier obtains customer signature.
5. If information does not match:
    - Delivery is marked failed.
    - Product is returned to pharmacy same day.

Delivery to any unauthorized person is strictly prohibited.

VII. NOTIFICATION OF MISSING PRODUCT TO PMP

If a product is missing:

- Dispatch notifies pharmacy immediately.
- Supervising PMP is notified within 24 hours of discovery.
- Notification includes:
    - Manifest number
    - Courier name
    - Product details
    - Description of circumstances
    - Law enforcement report (if applicable)

VIII. LAW ENFORCEMENT & UDAF NOTIFICATION PROCEDURE

For theft, diversion, or criminal activity:

1. Driver contacts 911 immediately.
2. Dispatch notifies pharmacy.
3. Dispatch notifies UDAF within 24 hours.
4. Written incident report submitted to Department.
5. Police report number documented.
6. ICS updated accordingly.

IX. LOGGING MISSING PRODUCTS INTO ICS

Upon identification of missing product:

1. Pharmacy enters discrepancy into ICS.
2. Incident is flagged for internal review.

3. Courier provides written statement.
4. All associated delivery logs are preserved.

High Road cooperates fully with pharmacy reconciliation.

X. PROCEDURE FOR RETURN OF UNDELIVERED PRODUCT

If delivery is unsuccessful:

1. Courier marks task as failed.
2. Dispatch notified.
3. Courier returns product to originating pharmacy same day.
4. Pharmacy reconciles product in ICS.
5. Courier signs return log.
6. Manifest is closed.

No product may remain in courier possession overnight.

XI. ORDER CHANGE PROHIBITION

Couriers may not:

- Modify orders
- Substitute products
- Adjust quantities
- Add or remove items

If customer requests change:

- Delivery is canceled.
- Customer directed to contact pharmacy.
- Product returned to pharmacy.

XII. PROHIBITION ON CONSUMPTION

Courier agents are strictly prohibited from:

- Consuming cannabis while on duty.
- Consuming cannabis while in possession of medical cannabis.
- Being under the influence while performing courier duties.

Violation results in immediate removal from active courier service.

XIII. PAYMENT VERIFICATION PROCEDURE

Before completing delivery:

1. Courier confirms payment through pharmacy-authorized system.
2. Debit or electronic payment processed directly by pharmacy.
3. Courier confirms transaction approval.
4. Customer signs receipt.
5. Delivery is marked complete.

No cash accepted.
No product delivered without confirmed payment.

XIV. PMP CONTACT INFORMATION & AVAILABILITY

Each contracted pharmacy provides:

- Supervising PMP name
- Direct contact number
- Escalation number
- Operating hours

High Road maintains updated PMP contact list internally.

During delivery hours, PMP or designated pharmacy supervisor remains available for:

- Clinical questions
- Missing product notification

- Delivery issues
- Escalation support

Contact information is reviewed and updated regularly.