

SOPs for Age Verification

AGE VERIFICATION OVERVIEW

Tambre is committed to adhering to regulatory requirements for age verification to ensure that no cannabis or cannabis items are dispensed to individuals under the age of 21. Tambre will ensure that these SOPs for age verification comply with N.J.A.C. §17:30-14.2 and §17:30-14.3.

Tambre will provide adequate and thorough training on conducting consumer age verification to all employees and security guards involved in verifying identification cards or initiating sales of cannabis, including on-site sales and curbside retail sales. Within 30 days of employment and annually thereafter, all individuals requiring training will complete at least eight hours of onsite or online training courses per N.J.A.C. §17:30-9.8(a). Per N.J.A.C. §17:30-9.8(b), topics will include state and federal laws regarding cannabis; state and federal laws regarding privacy and confidentiality; informational developments in the field of cannabis; the proper use of security measures and controls that have been adopted; and specific procedural instructions for responding to an emergency, including a robbery or workplace violence. Additionally, Tambre will explore age verification equipment to aid in verifying consumer age and identity and identifying fraudulent identification cards.

VERIFYING CONSUMER AGE AND IDENTIFICATION

Compliance

To compliantly dispense adult-use cannabis, employees will verify the age of each person seeking access to the Customer Sales Area by inspecting the photographic identification card for each consumer to ensure the consumer is not under the age of 21. Pursuant to N.J.A.C. §17:30-14.3(c), personnel will log that the examination of photographic identification cards and confirmation of legal age occurred in a record, and will maintain such record, which will be available for inspection by the Commission should they request it. The currently planned point-of-sale system facilitates scanning of ID barcodes to verify age.

In accordance with N.J.A.C. §17:30-14.2(d) and §17:30-9.5(c-d), Tambre will not allow anyone under the age of 21 to purchase cannabis items or to enter or remain on the premises unless accompanied by a parent or legal guardian and will ensure similar restrictions are enacted on any internet site operated by the facility. Tambre will only sell cannabis items directly to a consumer, in compliance with N.J.A.C. §17:30-14.2(e). Tambre will make a good faith effort to prevent a consumer from exceeding one ounce of usable cannabis or the equivalent weight in cannabis products, in multiple sales transactions, as per N.J.A.C. §17:30-14.3(e).

After consumer age has been verified and in compliance with N.J.A.C. §17:30-14.2(d)(1-4), Tambre will not sell to a consumer in a single sales transaction:

1. More than one ounce of usable cannabis;
2. The equivalent of more than one ounce of usable cannabis as a cannabis-infused product in solid, liquid, or concentrate form;
3. More than five grams of cannabis concentrate; or
4. Some combination thereof not to exceed one ounce, or the equivalent, of usable cannabis and cannabis products.

To protect individual privacy in accordance with standard privacy policy, Tambre will not require a consumer to provide personal information other than government-issued identification, to determine the consumer's identity and age, pursuant to N.J.A.C. §17:30-14.3(b)(1). Furthermore, and in accordance with N.J.A.C. §17:30-14.3(b)(2-3), Tambre will not collect nor retain any personal information about a consumer other than information typically acquired in a financial

transaction conducted by the holder of a Class C retail license concerning alcoholic beverages as set forth in N.J.S.A. 33:1-12; nor will Tambre keep a copy of the consumer's photographic identification.

Pursuant to N.J.A.C. §17:30-14.3(a)(1-4), before allowing entrance, and before selling or serving cannabis items to a consumer, for each transaction, personnel will examine any one of the following pieces of photographic identification to determine that the consumer can legally purchase cannabis:

1. The person's United States passport; other country's passport; or proper government-issued documentation for international travel, provided it is lawful to use as identification in the United States;
2. The person's motor vehicle driver's license, whether issued by New Jersey or by any other state, territory, or possession of the United States, or the District of Columbia, provided the license displays a picture of the person;
3. A New Jersey identification card issued by the New Jersey Motor Vehicle Commission; or
4. Any other identification card issued by a state, territory, or possession of the United States, the District of Columbia, or the United States that bears a picture of the person, the name of the person, the person's date of birth, and a physical description of the person.

Age Verification for On-Site Retail Sales

On the exterior of the business, Tambre will utilize signage that indicates that it is illegal to sell to anyone 21 years and under and that the store will check identification cards upon purchase. All persons who enter the retailer will be greeted by a security guard who will verify that the person may remain on the premises and will permit entry into the authorized areas of the facility. Before consumers are allowed entry into the Customer Sales Area, consumer age and identification cards will be verified in the Outer Lobby Waiting by an employee or security guard who has been trained for this role, in compliance with N.J.A.C. §17:30-14.3(a).

Any unauthorized person will be denied access and will be required to vacate the premises. Consumer age and identification cards will be verified again in the Customer Sales Area prior to initiating sales of cannabis or cannabis products. After sales have been completed and consumers have been issued a receipt, consumers will be required to immediately exit the premises. Smoking, ingestion, or consumption of cannabis will be prohibited on the licensed premises at all times.

Age Verification for Curbside Retail Sales

In accordance with N.J.A.C. §17:30-14.4(b)(1), prior to initiating curbside retail sales, Tambre will provide the Commission with, and will seek approval from the Commission on, standard operating procedures regarding verifying photographic identification. Tambre will verify photographic identification prior to conducting the retail sale and ensuring that transactions are conducted in a secure and monitored manner, in accordance with N.J.A.C. §17:30-9.10. Tambre will validate the consumer's age by phone/online means and an in-person verification will be conducted by an employee or security guard prior to sale.

Tambre will have a designated parking spot for use in the conduction of curbside retail sales to facilitate transactions and will increase the quantity of parking spots used for this purpose as necessary to accommodate sales. When consumers arrive on the premises to pick up their scheduled curbside retail sale order, they will park in the designated parking spot where personnel will conduct an in-person visual verification of the consumer's photographic identification prior to making a curbside retail sale, as per N.J.A.C. §17:30-14.4(c)(4). No cannabis or cannabis products will be dispensed prior to an in-person age and identity verification.

CONSUMER AGE VERIFICATION TRAINING FOR EMPLOYEES

Training Program Overview

Tambre acknowledges the importance of enforcing a strict policy regarding age verification and identification checks to ensure compliance with laws and regulations and to prevent unlawful access. All trained personnel will demonstrate the commitment to upholding all laws and regulations applicable to age verification and identification inspection for the compliant sale of adult-use cannabis in New Jersey, as well as understanding of SOPs and performance of job duties to management expectations and standards.

Tambre will train personnel on the importance of age verification and identifying false identification. Training on the prohibition of sales to persons under the age of 21 will include all relevant New Jersey laws and New Jersey Cannabis Regulatory Commission rules. Employees and security guards will complete training sessions before they are allowed to sell cannabis or cannabis items or verify consumer age and identification cards. Tambre will provide annual re-training or refresher training to ensure compliance, and will also provide training to employees and security guards when changes are made to the security features or appearance of New Jersey-issued driver's licenses.

Distinguishing a fraudulent identification card simply by appearance is not always easy since distributors of fake identification cards are constantly improving their methods of replication. As part of the age verification training, personnel will learn to recognize the differences between legitimate and illegitimate identification. This training will include training on the security features of a legitimate New Jersey driver's license, which is printed using high-tech card printers that improve counterfeit resistance.

Personnel will become familiar with the appearance of legitimate identification cards, including special markings, features, and fonts, and where identifying information is located on the document. Curriculum will focus on small details of valid identification cards, such as the card's texture, holograms, and watermarks, and will prepare employees to comply with all laws and regulations for age verification and identification inspection.

Identifying Fake Identification Cards

Tambre personnel will be trained to never accept identification presented inside of a wallet and will require consumers to remove the document from any holder for thorough inspection. Some fake identification cards have legitimate bar codes and information embedded into them, so personnel will be trained to inspect identification cards thoroughly.

Often, illegitimate identification cards will appear to be issued from a state different than where the attempted use occurs. Therefore, if a consumer shows identification card from a state other than New Jersey, personnel will be trained to refer to an easily accessible identification card reference guide to assist in identifying illegitimate identification cards. Personnel will obtain familiarity with valid identification hallmarks for neighboring states or states with a high volume of consumers that visit the retailer.

Tambre personnel will complete training to notice distinguishing features, such as detailed grooves and textures that fraudulent identification producers may not be able to replicate accurately. Low-quality illegitimate identification cards often leave telltale manufacturing flaws that can aid in determining their illegitimacy. When inspecting an identification card, personnel will feel for imperfections, such as bubbles, pin holes, rough edges, or thick lamination.

Additionally, personnel training will include curriculum to observe simple mistakes, such as misspelled words, incorrect formatting, and smudging or bleeding of colors on the card. If personnel are unsure of the legitimacy of an identification card, they will ask questions to further

verify the identity of the consumer and may request the assistance of management personnel to confirm or verify their findings and observations of the person and the identification card.

Also, since fake identification card distributors often fail to ensure consistency, some identification card numbers are generated by using state, name, and birthday information and follow a recognizable numerical pattern. personnel will be trained to identify these telling features of an illegitimate identification card.

To aid in age verification training, personnel will be trained on the F.L.A.G. acronym for identifying fraudulent identification cards. This technique includes:

- Feeling the identification card for imperfections;
- Looking carefully at the consumer and comparing against the identification card;
- Asking personal questions to confirm consumer identity; and
- Giving back the identification card and refusing service if the card appears to be fraudulent.

Identifying Borrowed or Stolen Identification Cards

Tambre personnel will be trained to pay close attention to distinguishing personal traits of the individual shown in the identification card. Since physical features like hair and eye color can change, personnel will be trained to focus on the permanent features of the body or face, such as the position and shape of the eyes, hairline, nose, or mouth, and to look for distinguishing facial features, such as dimples, noticeable scars, or one eye set higher than the other.

Since the identification card may be stolen or borrowed, it is possible for a photo to resemble the person trying to buy cannabis or cannabis items. Training will instruct personnel to ask questions that may not be so obvious, while remaining unaccusatory. Someone may have memorized the birthdate or other personal information on the card, so personnel will be instructed to ask more obscure questions, such as high school graduation year or zip code.

Many people using an illegitimate form of identification will exhibit unusual behavior, and Tambre personnel will be instructed by management to pay special attention to body language and nervousness, which could be reason for suspicion. Personnel will be trained to follow their instincts and always proceed with caution.

If, after following age verification training procedures, personnel feel that the consumer's identification card is fraudulent, they will give the identification card back and refuse service. The employee or security guard will notify management and other employees of the event and the event will be recorded. The consumer presenting the fraudulent identification card will be required to exit the premises immediately.

Utilizing Age Verification Equipment

Tambre will consider an electronic age verification system and compatible devices to employees and security guards tasked with verifying age and identify of consumers. Tambre will explore use of an age verification system that is recommended by law enforcement professionals and can detect fraudulent identification cards with up to 99% accuracy. The electronic age verification system will scan identification cards to ensure they are valid before utilizing facial recognition to ensure that the consumer presenting the identification card is doing so lawfully.

This electronic age verification system will be integrated into tablet devices that will be used on-site to verify identification in the Outer Lobby Waiting. Tablet or mobile devices will also be integrated with the age verification system to facilitate curbside sales. The system will connect with the point-of-sales system to verify age and identity again during sales in the Customer Sales Area.

The electronic age verification device will ensure that personnel never accept an expired identification card, and personnel will always be required to check the identification card, even if the consumer appears to be older than the age of 21. The electronic age verification device will verify the individual's age and check the individual against lists and alerts for fraud, purchaser limits, and excessive purchases. Electronic age verification devices will be sanitized regularly and any time they are touched or handled by a new individual.

Additionally, an ultraviolet scanner and an identification card checking guide booklet will be available to employees and security guards. The ultraviolet scanner will be used in addition to other age verification methods to reveal security features on identification cards such as holograms or fluorescent overlays which are otherwise not visible. Identification card checking booklets will include examples of valid driver's licenses, as well as common features of fake identification cards, for all fifty U.S. states. This booklet will be replaced annually to ensure that the examples of valid identification cards are current, and that the information is up-to-date with the most recent methods and signs of fake identification cards.