

SAFETY AND SECURITY PLAN

Executive Summary

Farmers NJ LLC (“Farmers”) is a proud New Jersey organization deeply committed to providing high-quality, affordable products to our community as a Class 5 Cannabis Retailer licensee. Farmers presents this Safety and Security Plan to demonstrate Farmers’ policies and procedures to maintain a secure retail facility (“Facility”) and to prevent diversion or other loss of cannabis items in accordance with all applicable statutes and regulations.¹ Our team has exhaustively assessed—and will fully comply with—the New Jersey Cannabis Regulatory, Enforcement Assistance, and Marketplace Modernization Act, N.J.S.A. § 24:6I-31 et seq. (“CREAMM Act”), the New Jersey Cannabis Regulatory Commission (“CRC”) Personal Use Cannabis Rules, N.J.A.C. § 17:30-1.1 et seq. (“CRC Rules”), and the Code of the City of Atlantic City (“Atlantic City Code”).

Farmers will implement appropriate security measures that protect the premises and all individuals that are present at the Facility.² Farmers will ensure that the Facility is equipped with a fully functioning, continuously operating, and consistently tested and maintained security and surveillance system—including an alarm system, video surveillance system, access management system, and visitor management system. To complement these systems, Farmers will employ screening and monitoring procedures to limit access to the Facility to authorized individuals and to supervise all individuals on the premises. Farmers will also implement a multi-faceted diversion prevention plan and securely handle all cannabis items. Farmers’ emergency management plan will incorporate reporting requirements from the CRC Rules and will contain a disaster plan with procedures to be followed in case of fire or other emergencies. Additionally, Farmers will employ comprehensive cybersecurity procedures. Finally, Farmers is committed to fostering a safe workplace and has developed a workplace safety plan to address all applicable occupational safety and health rules. Farmers is confident that our Facility will be a shining example of how to conduct safe and secure operations as a Class 5 licensee.

Authorized Activities

Farmers will conduct all operations at the Facility, which will be located at the address listed on Farmers’ Class 5 license.³ As a Class 5 licensee, Farmers is authorized to: (1) purchase or acquire usable cannabis from cannabis cultivators or cannabis retailers; (2) purchase or otherwise obtain cannabis products and related supplies from cannabis manufacturers, cannabis wholesalers, or cannabis retailers; (3) purchase or acquire paraphernalia; (4) possess, display, transport, and transfer usable cannabis, cannabis products, paraphernalia, and related supplies; and (5) distribute, supply, sell, or furnish usable cannabis, cannabis products, paraphernalia, and related supplies to consumers or to other cannabis retailers.⁴ A purchase made through Farmers’ website will be considered to have been conducted at the Facility.⁵ Farmers will prohibit any cannabis item or alcohol from being consumed on the premises of the Facility or in public areas in the vicinity.⁶

¹ N.J.S.A. § 24:6I-36(d)(1)(c)(ii); N.J.A.C. § 17:30-7.10(b)(17).

² N.J.A.C. § 17:30-9.10(b)(3).

³ N.J.A.C. § 17:30-9.1(a); N.J.A.C. § 17:30-12.1(b).

⁴ N.J.A.C. § 17:30-12.2(a)(1)-(5).

⁵ N.J.A.C. § 17:30-12.1(b).

⁶ N.J.A.C. § 17:30-9.5(a).

Farmers will not sell food, beverages, alcohol, or tobacco at the Facility and will not sell or give cannabis items to a person under 21 years old.⁷

Curbside Retail Sales

Farmers may conduct curbside retail sales if approved by the CRC and in accordance with the CREAMM Act and CRC Rules, including N.J.A.C. § 17:30-12.4.⁸ Prior to initiating curbside retail sales, Farmers will provide the CRC with standard operating procedures for: (1) taking cannabis item orders, verifying photographic identification, and receiving payment; (2) logging transactions; and (3) security needed to accommodate curbside retail sales.⁹ Farmers will also notify Atlantic City and local law enforcement that Farmers intends to conduct curbside retail sales.¹⁰ Farmers will ensure that any area used for curbside retail sales is constantly monitored to ensure that all transactions are conducted in a secure manner.¹¹

Home Delivery

Farmers may deliver cannabis items to a consumer at a residence in compliance with N.J.A.C. § 17:30-12.8.¹² Farmers will only deliver: (1) to a residence, including a temporary residence, in New Jersey; (2) to a legal consumer whose age has been verified; and (3) a cannabis item in-person and not through the use of an unmanned vehicle.¹³ Prior to initiating delivery services, Farmers will provide the CRC with a delivery plan for approval, which will include, but is not limited to: standard operating procedures for tracking delivery vehicles and inventory; security for delivery personnel, delivery vehicles, and inventory; and emergency notification and response in the event of accidents, theft, equipment malfunction, or other emergency events.¹⁴

In transit, cannabis items will be secured in a sanitary lockbox within the delivery vehicle.¹⁵ Delivery vehicles will contain an operational Global Positioning System (“GPS”) device at all times, and a delivery vehicle will bear no markings that would identify that the vehicle is used to deliver cannabis items.¹⁶ When outside of the vehicle, Farmers personnel will lock the delivery vehicle and lockbox and will engage the vehicle alarm system.¹⁷ Prior to furnishing purchased cannabis items to a consumer, Farmers personnel will conduct an in-person visual verification of the photographic identification of the consumer.¹⁸ Farmers will not leave cannabis items unattended, such as on a porch or stoop, and will not deliver in mailboxes or to post office boxes or to any residence located on land owned or leased by the federal government.¹⁹ Farmers will report any vehicle accidents, diversions, losses, or other reportable events that occur during

⁷ N.J.A.C. § 17:30-9.5(b), (d); N.J.A.C. § 17:30-12.2(d)-(e).

⁸ N.J.A.C. § 17:30-12.4(a).

⁹ N.J.A.C. § 17:30-12.4(b)(1)-(3).

¹⁰ N.J.A.C. § 17:30-12.4(d).

¹¹ N.J.A.C. § 17:30-12.4(c)(6).

¹² N.J.A.C. § 17:30-12.8(a), (b); N.J.A.C. § 17:30-12.2(a)(5)(i).

¹³ N.J.A.C. § 17:30-12.8(g)(1)-(3).

¹⁴ N.J.A.C. § 17:30-12.8(x)(6)-(8).

¹⁵ N.J.A.C. § 17:30-12.8(d).

¹⁶ N.J.A.C. § 17:30-12.8(p), (q).

¹⁷ N.J.A.C. § 17:30-12.8(e).

¹⁸ N.J.A.C. § 17:30-12.8(i).

¹⁹ N.J.A.C. § 17:30-12.8(h).

delivery to the appropriate state and local authorities, including the CRC.²⁰ Law enforcement or any regulatory authority or agency may request that Farmers delivery personnel present a Cannabis Business Identification Card or a copy of a delivery request.²¹

Secure Transportation to and from other Cannabis Businesses

Farmers may securely transport cannabis items to and/or from another cannabis business in compliance with N.J.A.C. § 17:30-9.15.²² Farmers will transport cannabis items using Farmers personnel and vehicles and will never transport cannabis items with an unmanned vehicle.²³ Transport vehicles will be equipped with a lockbox or cargo area that is used for the sanitary and secure transport of cannabis items.²⁴ Any vehicle used by Farmers to transport cannabis items will be equipped with an operational GPS device at all times, and a transport vehicle will bear no markings that would identify that the vehicle is used to transport cannabis items.²⁵ During transport, Farmers personnel will: (1) maintain a copy of the transport request and make it available upon request to law enforcement and regulatory authorities and agencies; and (2) possess their Cannabis Business Identification Card and will present it to CRC staff or law enforcement officials upon demand.²⁶ Farmers personnel will never leave cannabis items in an unattended transport vehicle unless the vehicle is locked and equipped with an active vehicle alarm system, and cannabis items will not be left in a transport vehicle overnight or outside of operating hours.²⁷ Farmers personnel will report to the CRC and law enforcement any vehicle accidents, diversions, losses, or other reportable events that occur during transport, not more than 24 hours after such accidents, diversions, losses, or other reportable events occur, pursuant to N.J.A.C. § 17:30-9.11.²⁸

Plans for the Use of Security Personnel

All management services contractors and employees that access the Facility—including security personnel—will undergo background checks pursuant to N.J.A.C. § 17:30-7.12 and obtain a Cannabis Business Identification Card.²⁹ Every management services contractor and employee that accesses the Facility will be required to renew their Cannabis Business Identification Cards annually and submit to any other background screening as may be required by Farmers or the CRC.³⁰ No person will begin working at the Facility before obtaining a Cannabis Business Identification Card and completing initial training in accordance with N.J.A.C. § 17:30-8.1(b).³¹

Each Farmers management services contractor and employee will complete at least eight hours of ongoing training each calendar year on subjects including the proper use of security measures and controls that have been adopted and specific procedural instructions for responding to an

²⁰ N.J.A.C. § 17:30-12.8(u).

²¹ N.J.A.C. § 17:30-5.1(k).

²² N.J.A.C. § 17:30-9.15(a); N.J.A.C. § 17:30-12.2(a)(1)-(5).

²³ N.J.A.C. § 17:30-9.15(b), (h).

²⁴ N.J.A.C. § 17:30-9.15(c)(1), (3).

²⁵ N.J.A.C. § 17:30-9.15(c)(2), (e).

²⁶ N.J.A.C. § 17:30-9.15(g)(3)-(4); N.J.A.C. § 17:30-5.1(k).

²⁷ N.J.A.C. § 17:30-9.15(g)(1).

²⁸ N.J.A.C. § 17:30-9.15(k).

²⁹ N.J.A.C. § 17:30-8.1(a), (b)(3).

³⁰ N.J.A.C. § 17:30-8.1(e), (g).

³¹ N.J.A.C. § 17:30-9.8(d).

emergency, including a robbery or workplace violence.³² Farmers will maintain a personnel record for each management services contractor and employee that includes the information set forth by N.J.A.C. § 17:30-9.7(i)(1)-(10). Farmers will maintain these personnel records for at least 12 months after the termination of the person’s affiliation with Farmers.³³ Farmers will also notify the CRC within 10 business days of the date that a management services contractor or employee with a Cannabis Business Identification Card ceases to work at or be affiliated with Farmers.³⁴

Experience or Qualifications of Security Personnel and Proposed Contractors

Farmers will only hire or contract with professionally licensed security personnel. In addition to all other state-required certifications and training, security personnel will undergo internal trainings, including CPR/First Aid, proactive threat assessment screening (non-physical screening for threats), “verbal judo” and de-escalation tactics, unarmed control of violent individuals, and use of Farmers surveillance, alarm, and access control systems. Any management services agreement for the provision of security services will comply with N.J.A.C. § 17:30-6.9.

Security and Surveillance Features

Alarm System

At the Facility, Farmers will install, maintain in good working order, and operate a safety and security alarm system to detect unauthorized entry and provide suitable protection against theft and diversion—including protection against theft or diversion that is facilitated or hidden by tampering with computers or electronic records.³⁵ The alarm system will be continuously monitored, 24 hours a day, seven days a week, either on or off-site.³⁶ The interior and exterior of the Facility will be equipped with electronic monitoring, video cameras, and panic buttons.³⁷ The alarm system will also feature immediate automatic or electronic notification to alert Farmers personnel and law enforcement of any breach of security at the Facility.³⁸

Farmers’ alarm system will feature a backup system that activates automatically upon a loss of electrical support and immediately issues notification to law enforcement.³⁹ In the event of a failure of the alarm system due to a loss of electrical support or mechanical malfunction that is expected to last longer than eight hours, Farmers will notify the CRC pursuant to N.J.A.C. § 17:30-9.11 and provide alternative security measures approved by the CRC, or close the Facility until the alarm system is restored to full operation.⁴⁰

³² N.J.A.C. § 17:30-9.8(a), (b)(4)-(5).

³³ N.J.A.C. § 17:30-9.7(j), (j)(1).

³⁴ N.J.A.C. § 17:30-8.2.

³⁵ N.J.A.C. § 17:30-9.10(a), (b)(1).

³⁶ N.J.A.C. § 17:30-9.10(c), (c)(1).

³⁷ N.J.A.C. § 17:30-9.10(b)(9).

³⁸ N.J.A.C. § 17:30-9.10(b)(1)(i).

³⁹ N.J.A.C. § 17:30-9.10(b)(1)(ii).

⁴⁰ N.J.A.C. § 17:30-9.10(b)(6)(i)-(ii).

Video Surveillance System

Farmers will install and operate a video surveillance system at the Facility that is approved by the CRC and continuously monitored, 24 hours a day, 365 days a year, either on or off-site.⁴¹ Farmers will coordinate the Facility's video surveillance system with the Atlantic City Police Department.⁴²

The video surveillance system will clearly monitor all critical control activities of the Facility, and Farmers will ensure that the system is in working order and operating at all times.⁴³ All cameras will be angled to allow for the capture of clear and certain identification of any person entering or exiting the Facility, and the video surveillance system will be supported by adequate security lighting that illuminates all entrances and exits.⁴⁴ The Facility will also have video cameras in all areas that contain cannabis items, and cameras will be directed at all safes and vaults.

Farmers will ensure that the system can produce clear still photos with a date and time stamp embedded in all recordings and that footage can be stored in a standard format. Additionally, Farmers will provide access for remote viewing by the CRC. Farmers will ensure that the original tapes or digital pictures produced by the video surveillance system are stored in a safe place with a 30-day archive.⁴⁵ Recordings will be retained as long as necessary if Farmers is aware of a pending criminal, civil, or administrative investigation or legal proceeding for which the recording may contain relevant information.

Access Management System

Access from outside of the Facility will be kept to a minimum and will be well controlled.⁴⁶ Farmers' access management system will consist of the following, at a minimum:

- Electric strike locks on all doors in the Facility with the ability to override access control for emergency exit—even during a power outage;
- Biometric fingerprint and proximity card access control devices for all doors entering or exiting restricted access areas and all exterior entrances and exits into the Facility;
- Proximity card access control devices for all doors entering and exiting areas where cannabis items are held;
- An access control system that allows for programming or uploading individual user permissions and allowed entry times, as well as operations-specific information—including employee photos;
- An access control system that monitors and records identification of employees or visitors entering and exiting, date and time of entry and exit, length of time in a specific area, and any unauthorized attempts for access; and
- A backup battery system that immediately provides power for at least 24 hours in the event of a power outage.

Visitor Management System

Visitors, including contractors, authorized representatives of the CRC, and other government officials, will obtain a visitor identification badge before gaining access to the Facility. Visitors must provide a government-issued identification pursuant to N.J.A.C. § 17:30-12.3(a)(1)-(4). Once

⁴¹ N.J.A.C. § 17:30-9.10(b)(9)(i), (c), (c)(1); Atlantic City Code § 163-78.2(F).

⁴² Atlantic City Code § 163-78.2(F).

⁴³ N.J.A.C. § 17:30-9.10(b)(9)(i).

⁴⁴ N.J.A.C. § 17:30-9.10(b)(10)(ii).

⁴⁵ N.J.A.C. § 17:30-9.10(b)(9)(ii).

⁴⁶ N.J.A.C. § 17:30-9.10(b)(7).

the Security Officer has verified that all information is accurate and that the name on the identification matches the name in the visitor log, a visitor identification badge may be issued. Before leaving the Facility, the visitor must return the visitor identification badge to the Security Officer. Once the Security Officer has checked out the visitor, the visitor will immediately leave the Facility and premises.

Systems Maintenance and Testing

Farmers will establish protocols for testing and maintenance of the security alarm system.⁴⁷ As part of those protocols, Farmers will conduct maintenance inspections and tests of the security alarm system at intervals not to exceed 30 days from the previous inspection, and Farmers will test and promptly implement all necessary repairs to ensure proper operation of the alarm system.⁴⁸

Procedures for Screening and Monitoring

Farmers will implement security protocols and procedures to limit access to the Facility to authorized individuals, and Farmers will ensure the Facility is secure from unauthorized entry. The Facility will only be accessible to individuals who are 21 years of age or older—unless accompanied by a parent or legal guardian—with a verified and valid government-issued photo identification.⁴⁹ Loitering will be strictly prohibited, and Farmers will ensure that only individuals engaging in activity permitted by the CRC or applicable laws are allowed to remain on the premises. Prior to entry, Farmers personnel will immediately inspect the individual’s proof of identification pursuant to N.J.A.C. § 17:30-12.3(a)(1)-(4) and determine the individual’s age. To protect consumer privacy, a consumer is not required to provide Farmers with personal information other than government-issued identification, and Farmers will not keep a copy of the consumer’s identification.⁵⁰ Farmers will not collect and 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 by N.J.S.A. § 33:1-12.⁵¹ Farmers personnel will log that the examination of photographic identification and confirmation of legal age occurred in a record, and Farmers will maintain such record and make it available for inspection by the CRC.⁵²

All outside vendors, contractors, and visitors will be logged in and out of the visitor log, and Farmers will maintain this log and make it available to the CRC for inspection. Upon entering the Facility, vendors, contractors, and visitors will obtain a visitor badge and will be escorted at all times by Farmers personnel.⁵³ A vendor-contractor’s staff shall be considered to be a visitor when present at the Facility, except if the person possesses a Cannabis Business Identification Card.⁵⁴ Visitor badges will be visibly displayed at all times, and Farmers will ensure that all visitor identification badges are collected before visitors leave the Facility.

⁴⁷ N.J.A.C. § 17:30-9.10(b)(4).

⁴⁸ N.J.A.C. § 17:30-9.10(b)(5).

⁴⁹ N.J.A.C. § 17:30-9.5(c); N.J.A.C. § 17:30-12.2(d).

⁵⁰ N.J.A.C. § 17:30-12.3(b)(1), (3).

⁵¹ N.J.A.C. § 17:30-12.3(b)(2).

⁵² N.J.A.C. § 17:30-12.3(c).

⁵³ N.J.A.C. § 17:30-9.4(l).

⁵⁴ N.J.A.C. § 17:30-9.4(l)(1).

Farmers' security and safety measures will deter and prevent unauthorized entrance into areas containing cannabis items and will prevent the theft of cannabis items.⁵⁵ Entry into areas where cannabis items are held at the Facility will be limited to authorized personnel.⁵⁶ When visitors are required to enter cannabis item storage areas, Farmers will ensure there is adequate observation of the area by personnel whom Farmers specifically authorized by policy or job description to supervise the activity.⁵⁷ In addition, Farmers will require all employees to wear employee identification badges at all times while inside the Facility.

The outside perimeter of the Facility will be well-lighted, and exterior lighting will be sufficient to deter nuisance and criminal activity and facilitate surveillance.⁵⁸ Farmers will make reasonable efforts to not disturb surrounding businesses or neighbors.⁵⁹ All trees, bushes, and other foliage outside the Facility will be maintained to prevent persons from concealing themselves from sight. No cannabis or cannabis paraphernalia will be displayed in a manner that is clearly visible to a person from the exterior of the Facility.⁶⁰

Secure Storage of Cannabis Items

Farmers will store all cannabis items in an enclosed indoor, locked area pursuant to N.J.A.C. § 17:30-9.12 where access to such area is limited to an owner, principal, employee, or volunteer of Farmers or staff members of Farmers' management services contractor that possess a Cannabis Business Identification Card when acting in their official capacity.⁶¹ All cannabis items that are ready for sale will be securely stored in a locked area, which may include a locked room, cage, or safe, with adequate security and limited access.⁶² Farmers will determine the level of "adequate security" by considering the factors set forth in N.J.A.C. § 17:30-9.12(b)(1)(i)-(vi). Farmers' standard operating procedures will identify any Farmers personnel with authorization to access the storage area.⁶³ In addition, Farmers will maintain a list of individuals with access to keys and a policy for key issuance and lock replacement. Farmers will limit access to cannabis item storage areas to the minimum number of authorized personnel necessary to maintain safe and orderly operations.⁶⁴

Diversion Prevention Plan

Farmers' operating policies and procedures will ensure the prevention of diversion, theft, and illegal or unauthorized conduct. Considerations regarding diversion prevention measures include, but are not limited to, personnel accountability, and identifying, recording, and reporting diversion, theft, or loss. More specifically, policies and procedures will ensure that:

⁵⁵ N.J.A.C. § 17:30-9.10(b)(2).

⁵⁶ N.J.A.C. § 17:30-9.10(b)(8).

⁵⁷ N.J.A.C. § 17:30-9.12(a)(1).

⁵⁸ N.J.A.C. § 17:30-9.10(b)(10)(i).

⁵⁹ N.J.A.C. § 17:30-9.10(b)(10)(i).

⁶⁰ N.J.A.C. § 17:30-14.2(e)(3).

⁶¹ N.J.A.C. § 17:30-12.7.

⁶² N.J.A.C. § 17:30-9.12(b).

⁶³ N.J.A.C. § 17:30-9.12(a)(2).

⁶⁴ N.J.A.C. § 17:30-9.12(a).

- Identification is verified to ensure that only individuals 21 years or older are permitted in the Facility, and Farmers will ensure that Farmers’ website is only accessible to individuals that are at least 21 years old.⁶⁵
- Farmers will not furnish cannabis to a consumer if Farmers suspects or has reason to believe that the person is unlawfully redistributing cannabis.
- Employees are aware of personal safety and crime prevention techniques.
- Any Farmers personnel who has diverted cannabis items is immediately dismissed, and the dismissal will be reported to law enforcement and the CRC.
- All employees must complete a diversion prevention training program.
- Farmers’ marketing, advertising, and branding practices do not promote the diversion of cannabis items.
- Farmers will maintain real-time inventory and will track and tag all seeds, clones, plants, and cannabis items, in a form and manner that is approved by the CRC.
- Farmers will destroy cannabis securely and in accordance with N.J.A.C. § 17:30-9.14 and N.J.A.C. § 17:30-9.7(h).
- All security requirements under the CREAMM Act and CRC Rules, including those requirements under N.J.A.C. § 17:30-9.10, will be followed.

In the event Farmers discovers that any personnel intentionally or negligently sold cannabis items to an individual under the age of 21, the personnel member will be immediately terminated, and the CRC will be promptly notified. Farmers will never employ persons under 18 years of age.⁶⁶

Emergency Management Plan and Incident Reporting

Farmers will develop emergency policies and procedures for securing all cannabis items following any instance of diversion, theft, or loss, and Farmers will conduct an assessment to determine whether additional safeguards are necessary. At the Facility, Farmers will maintain—and make available to law enforcement and the CRC—an operations manual that addresses: (1) procedures for inventory control, storage, and diversion prevention; (2) procedures for safely dispensing/selling cannabis; (3) employee, visitor, and Facility security policies; (4) safety procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies, and personal safety and crime prevention techniques; and (5) a description of Farmers’ hours of operation, after-hour contact information, criteria for refusing service to a consumer pursuant to unacceptable behavior, and procedures for ensuring consumers comply with cannabis business age verification policies.⁶⁷ All security policies and procedures will be shared with the Atlantic City Police Department. In addition, Farmers will provide law enforcement and neighbors within 100 feet of the Facility with the name and phone number of a Farmers personnel member to notify during and after operating hours to report any incidents or other problems with the Facility.⁶⁸

Farmers will immediately notify appropriate law enforcement authorities by telephone upon becoming aware of a reportable loss, discrepancies identified during inventory, diversion, or theft—whether or not the cannabis items, funds, or other lost or stolen property is subsequently

⁶⁵ N.J.A.C. § 17:30-12.2(d).

⁶⁶ N.J.S.A. § 24:6I-35(a)(6)(b).

⁶⁷ N.J.A.C. § 17:30-9.6(a)-(b).

⁶⁸ N.J.A.C. § 17:30-9.10(b)(11).

recovered and/or the responsible parties are identified.⁶⁹ Farmers will notify the CRC no later than three hours after discovery of such an event.⁷⁰ Farmers will notify the CRC within 24 hours by telephone, followed by email notification within five business days of: (1) an alarm activation or other event that requires response by public safety personnel; (2) a breach of security; (3) failure of the security alarm system due to a loss of electrical support or mechanical malfunction that is expected to last longer than eight hours; and (4) corrective measures taken, if any.⁷¹ Farmers will maintain documentation of any reportable occurrence in an auditable form for at least two years after the reporting of such occurrence.⁷²

Disaster Plan

Farmers will immediately notify appropriate law enforcement authorities and the CRC within 24 hours after the discovery of any of the following:

- Theft or physical loss of cannabis items or confidential records.
- Breach of Farmers' network servers.
- Robbery or unauthorized entry in the Facility.
- Threats of violence to the Facility, employees, or visitors.
- Bomb threats.
- Any criminal activity.
- Civil disturbances.
- Hazardous chemical spill.
- Infectious disease epidemic.
- Serious accidents.
- Fires.
- Weather-related events or other acts of God.

Any Farmers director or manager, in coordination with security staff, may determine the need to evacuate the Facility in the event of an emergency or other incident. Security staff will be actively engaged throughout the emergency or other incident to assess the progress of all containment and corrective measures and will determine when the incident is resolved.

Cybersecurity Procedures

Farmers will ensure the security of all hardware, software, data, and communications networks, including the following information technology ("IT") maintenance:

- Software registration.
- Security patches and malicious software prevention.
- Account management.
- Security status and network access monitoring.
- Disposal and redeployment.
- Employee IT security training.
- Vulnerability assessments.

All employee passwords for software and network access will be changed every six months. Access to protected information will be restricted to essential employees only. Access may be granted to the CRC and law enforcement if necessary to perform their official duties.

⁶⁹ N.J.A.C. § 17:30-9.11(a)(1).

⁷⁰ N.J.A.C. § 17:30-9.11(a)(2).

⁷¹ N.J.A.C. § 17:30-9.11(b)(1)-(4).

⁷² N.J.A.C. § 17:30-9.7(g).

Workplace Safety Plan and Familiarity with OSHA Regulations

Farmers' workplace safety policies and procedures will detail safety practices that meet or exceed the best practices in the industry and comply with Occupational Safety and Health Administration ("OSHA") guidelines, as well as all applicable state and local laws, regulations, ordinances, and other requirements. Workplace safety policies and procedures will be strictly enforced, and all Farmers personnel will comply as a condition of employment. Generally, Farmers will maintain sanitary conditions throughout the Facility.⁷³

In addition, Farmers will do the following:

- Provide a safe workplace and strive to achieve the goal of zero accidents and injuries.
- Provide mechanical and physical safeguards wherever they are necessary.
- Conduct routine safety and health inspections to find and eliminate unsafe working conditions, control health hazards, and comply with all applicable OSHA safety and health requirements.
- Train all employees in safe work practices and procedures.
- Provide employees with necessary personal protective equipment and train them to use and care for it properly.
- Investigate accidents to determine the cause and prevent similar accidents.
- Not discriminate against employees who exercise their "whistleblower" rights.
- Annually review and update workplace safety policies and procedures.

All employees will be trained on the safety policies and procedures upon initial employment. Farmers will keep a detailed log of work-related injuries and illnesses using OSHA Form 300 or a similar document. Each February through April, Farmers will post a summary of the injuries and illnesses recorded the previous year using OSHA Form 300A or similar document. Farmers will ensure the accuracy of these records and maintain them at the Facility for at least five years. In addition, to support a healthy and safe working environment, Farmers will maintain a contract with an approved New Jersey employee assistance program.⁷⁴ Farmers will also establish, implement, and adhere to alcohol, drug, and smoke-free policy pursuant to N.J.A.C. § 17:30-9.9(a)-(b).

History of Workers' Compensation Claims and Safety Assessments

We operate at the highest standard and therefore have never had any claims against our company.

Conclusion

Farmers looks forward to conducting a safe and secure Class 5 Cannabis Retail operation, and Farmers is committed to being a trustworthy, responsible, and transparent partner with the CRC and Atlantic City.

⁷³ N.J.A.C. § 17:30-9.4(i).

⁷⁴ N.J.A.C. § 17:30-9.9(c).