

SECURITY PLAN:

A detailed security plan outlining the measures that will be taken to ensure the safety of persons and property on the cultivation site. The security plan must be prepared by a qualified professional.

Embarc Colusa develops comprehensive Security Plans and will implement and maintain strict procedures to ensure the health, safety, and security of employees, customers, and the Colusa community relative to Embarc's operations. Below, please find an abridged summary of proposed security measures prepared by professional security consultant Matt Carroll.

Transparency and communication with the Colusa Police Department are critical to successful operations. While we believe the following security measures demonstrate an unparalleled understanding of security and compliance based on our professional security consultant's significant relevant experience and our existing operations, we welcome the opportunity to partner with the Police Department to further detail and/or modify the Security Plan components to align with the Department's goals.

Foreword

Embarc acknowledges that there are risks in operating a cannabis-related business, including burglary, robbery, theft, diversion, minors accessing the premises or products, and risks to the safety of employees, visitors, and the general public. Embarc is committed to ensuring a safe environment that mitigates as much risk as reasonably possible. Risk mitigation strategies include, but are not limited to, implementing those security requirements mandated by the California Code of Regulations, Title 4, Division 19: Department of Cannabis Control (DCC) Medicinal and Adult-Use Commercial Cannabis Regulations and all applicable locally instituted commercial cannabis regulations.

This Security Plan will be implemented by Embarc's appointed Security Director and will be maintained to ensure its relevancy and efficacy throughout the life of the business. The plan will be audited at least annually thereafter, and immediately following any significant security breach or security incident to ensure that the plan remains effective and that areas needing improvement are addressed as they are discovered. The plan will remain available for review by regulatory agencies, and Embarc will work collaboratively with the Police Department and other agencies as necessary to ensure that the plan meets or exceeds those minimum requirements imposed by regulatory agencies and legislative changes.

The plan is intended to serve as a living document governing the business' security during its design and throughout operations. Embarc will maintain an Appendix containing current security policies and those records relating to security equipment, contracts, warranties, equipment specifications, maintenance schedules, access logs, training logs, and evidence of compliance with the routine security auditing aspects called for in this plan. The plan will be maintained in a manner that ensures sufficient detail is available to future managers who may be required to assume responsibilities as the Security Director. The plan will be held in confidence, stored securely, and accessible only to managers and owners.

Security policies, procedures, and practices that are relevant to non-managerial employees, vendors, and visitors will be parsed from this plan and provided to such persons in a format appropriate for their training, testing, and accountability with respect to the plan.

Core Tenets

The following Security Plan is built on four critical program elements:

MANAGEMENT LEADERSHIP & EMPLOYEE INVOLVEMENT: Embarc will commit the necessary

financial, human, and time resources to ensure that all persons on the premises are protected from the identified and typical safety hazards associated with our operations. Management leadership will be responsible for leading the design, implementation, and continuous improvement of the site's safety procedures, including avenues for employee involvement in safety decision making and problem solving. Activities will include designated safety observers, peer safety training, analyzing and protecting against safety hazards, and planning activities to heighten safety awareness. Our team will ensure that visitors to the site do not introduce preventable safety hazards and have knowledge of safety procedures applicable to the purpose and function of their visit.

WORKSITE SAFETY ANALYSIS: Embarc has and will continue to engage outside consultants as necessary to conduct baseline surveys that identify and develop preventative controls to address potential facility safety hazards. Management and employees will work together to organize and conduct site inspections to continually address safety hazards and ensure safety remains top of mind in every aspect of our operations.

HAZARD PREVENTION & CONTROL: Management and employees will work together to analyze safety hazards inherent to job functions and will find means to eliminate those hazards whenever possible.

COMPREHENSIVE ONGOING TRAINING: Employee involvement in our safety program is only successful when everyone receives sufficient training to understand how to fulfill their safety responsibilities and opportunities. All employees will be trained in an initial and ongoing capacity to recognize safety hazards and to report any hazard found to the appropriate team member so that it can be corrected as soon as possible. Safety procedures will be integrated into initial and ongoing employee training and will be provided to

visitors on a case-by-case basis as it becomes relevant.

These core tenets have worked successfully across Embarc's existing operations to protect public and employee health and safety and will be similarly deployed in Colusa if selected.

Professional Security Consultant

Embarc's Security Plans are developed by Matthew Carroll—the Security Chief of Embarc and the founder of Carroll Security Consulting, LLC (CSC). Unlike the masses who contract CSC for a limited engagement aimed at developing a Security Plan for application purposes, Embarc has retained CSC as a contract employee for many years. Beyond developing Security Plans for Embarc, CSC provides ongoing support, oversight, and auditing of security services and strategies across Embarc's network of storefront retail locations in California.

Carroll holds an A.A. in the Administration of Justice (Shasta College, 1997), is a graduate of a California Peace Officer Standards and Training Academy (Sacramento County Sheriff's Training Center, 1998), holds a B.S. in Criminal Justice (Sacramento State University, 2000), is a tactical communication instructor through the Verbal Judo Institute (2000), is a Crime Prevention Through Environmental Design practitioner (National Institute of Crime Prevention, 2009) and is an Emergency First Response Instructor (Emergency First Response/Professional Association of Diving Instructors, 2021).

Carroll served in public law enforcement from 1997–2006 with the Sacramento County Sheriff's Department and the Sacramento-Yolo Port District Police Department. While employed as a port police officer, Carroll was tasked with bringing the Port of Sacramento into compliance with post-9/11 maritime security requirements. This involved extensive Security Planning, development, and implementation of access control, training and maintenance protocols, and management of quarterly drills and semi-annual

exercises in collaboration with the Federal, State, and local allied agencies. Carroll's Facility Threat Assessment and Facility Security Plans for the Port of Sacramento were deemed model plans and were used by the US Coast Guard as templates to assist other western seaboard ports in the development of their own plans.

Carroll served in the loss prevention and private patrol marketplaces from 1995–2020, serving in a range of capacities from covert surveillance to uniformed patrol and guard services to ownership of several security businesses based in the City of Sacramento. In 2003, Carroll co-founded Paladin Private Security in Sacramento (PPO 15029). Paladin was the largest mobile patrol service to operate from a single location anywhere in the United States, deploying upwards of eighty patrol cars daily at its peak and employing over two hundred, predominantly armed, Security Guards. Paladin served the security needs of commercial, residential, educational, entertainment, transportation, government, and cannabis entities. Carroll co-founded the Sacramento Security Training Center (SSTC), a State licensed security and firearms training center (TFF1511, TFB1320) and Emissary Secure Transport (cannabis-exclusive armored carrier licensed by the California Highway Patrol).

As Carroll's work in the commercial cannabis security planning arena grew, Carroll sold his interest in Paladin, SSTC and Emissary in order to focus his energies fulltime on consulting and planning services. Since 2015, Carroll has been consistently engaged by the commercial cannabis industry on a national scale. To date, Carroll has developed over 820 commercial cannabis Security Plans in 18 states and the District of Columbia—although predominantly in California.

Carroll's work in this regard has also attracted the public sector. Since 2016, Carroll has remained under contract with the Dixon Police Department and the Benicia Police Department as their cannabis security consultant and compliance

auditor. As a police consultant, Carroll trains police and code enforcement personnel on cannabis regulations, assists in developing local regulations, reviews/scores cannabis business applications, interviews cannabis business applicants and conducts periodic security audits of cannabis businesses on behalf of those police departments contracting his services.

In developing Security Plans, Carroll incorporates his far-reaching education and experience from nearly three decades of security and policing experience toward the creation of a premises that is an inherently unattractive target for external and internal threats alike, supported by detailed operating protocols.

PROMISES MADE, PROMISES KEPT: SECURITY AT THE FOREFRONT OF DECISION-MAKING

While Matt Carroll has been contracted to develop hundreds of cannabis Security Plans across the supply chain in California and across the country, Embarc is the only cannabis operator for which he feels comfortable being embedded as a member of the team. Embarc's willingness to put public health and safety at the forefront of decision-making, from site selection to floor plan development to training and ongoing management, has earned Mr. Carroll's seal of approval in a way none of the hundreds of other cannabis operators he has consulted with do.

Premises

In developing the premises, available CPTED strategies were incorporated to include natural surveillance, territorial reinforcement, and target hardening, particularly in those areas where theft, burglary, robbery, and diversion were foreseeable. Key security design features Embarc will implement include the following:

SCREENING LOBBY

Until a visitor has remitted a valid and matching identification, they will not be afforded access to the Retail Area. The proposed design includes a

Screening Lobby separated from the Retail Area, providing for territorial reinforcement, perception, and reaction time. Reception employees and Security Officers will enjoy natural surveillance over entry.

The effectiveness of natural surveillance and video monitoring relies on a Retail Area free of congestion. The Retail Area will maintain a reasonable ratio of customers per assigned Retail Area employee, ensuring their ability to effectively monitor customers and provide attentive customer service. To expedite transactions in the Retail Area, first-time visitors will be checked in by a reception employee in the Screening Lobby using Embarc's Metrc-compliant track-and-trace point-of-sale (POS) and inventory management system, Treez, during the age verification process, which requires presentation of a valid form of identification.

RETAIL CUSTOMER AREA

The retail customer area POS counter will be designed in a shape, providing natural surveillance over the retail floor and customers from multiple angles by retail employees. Surveillance viewing stations throughout the premises also provide additional passive monitoring. This ensures no person in the Retail Area may enjoy any sense of anonymity that could promote criminal conduct.

SECURE STORAGE

Embarc has adopted a model that maximizes product protection and increases employee accountability. The Secure Product Storage Room is accessible to limited supervisory employees (Managers and Leads) and Inventory Specialists. Being removed from the Retail Area ensures that those in the Retail Area do not enjoy direct insight into the location and security measures relative to the Secure Product Storage Room, and that specific credentials are needed for employees to enter.

BREAK AREA & RESTROOM

The employee Break Area and Restroom are strategically placed so that no travel or insight to product or currency storage areas is required to access these universally accessible employee areas.

MANAGEMENT & CASH VAULT ROOM

When feasible, the Cash Vault Room is only accessible only from the Management Office and is situated at the deepest point of the premises. Accordingly, access to these areas and insight into the storage methods and security features can be duly protected from front-line employees, vendors, and the public.

Operational Security

Embarc's security plan has been developed to ensure the safety of persons and property on the business site. The premises design and security features of the premises, supported by policies and supervisory employees, have been designed to achieve these goals and include the measures and strategies that follow:

The maximum operating hours of the business will be from 8:00 a.m. to 8:00 p.m. daily, or more restrictive hours as established by the use permit issued. A manager will be on the premises at all times that any other person (Security Officers excepted) is upon the premises. "Manager" may include the permittee, owner, proprietor, supervisory employees (General Manager, Assistant General Manager, Inventory Manager, Sales Manager, Lead, or Inventory Specialist), or other employee exercising control over the operation of the business.

All substantive doors of the premises will include commercial-grade door locks that meet ANSI/BHMA standards for Grade 1 products or the equivalent. All doors on access paths from the Screening Lobby to rooms containing cannabis or currency will be equipped with solid-core wood or hollow metal doors, reinforced steel frames, pry-

resistant latch protector plates, and automatic closing devices.

Access Control (Customers)

All entrances to the business will always remain locked and under the control of a designated responsible party that is either (i) an Embarc employee or (ii) a licensed Security Officer. While electronically controlled strikes will be used to provide for remote access provisioning, these strikes will remain traditionally controlled by key to ensure that they remain secure if an extended power outage were to overcome the ability of the backup power supplies to compensate.

Customers will only be permitted in the designated customer areas of the business, which shall be limited to only limited quantities of cannabis and cannabis goods for sale and displayed for purchase. Employees of Embarc will be tasked with verifying that persons entering the Retail Area are authorized to purchase cannabis. An “Authorized Customer” means the following:

- A person who is at least 18 years old and possesses a physician’s recommendation in accordance with the Compassionate Use Act of 1996, California Health and Safety Code Section 11362.5 et seq. Medical cannabis patients under the age of 18 shall be accompanied by a parent, legal guardian, or primary caregiver. Medical cannabis patients shall provide proof of a valid physician’s recommendation and valid proof of identification.
- A person who is at least 21 years of age who provides valid proof of identification demonstrating the age of the individual.

Access to the Retail Customer Area requires passage through several layers of controlled access points:

- The Screening Lobby entrance will remain electronically locked at all times (further secured by a deadbolt after business hours). The reception employee will pre-screen those seeking entry using a video monitor at the

Reception Workstation. Entrance will be granted only to those persons who can be identified by surveillance cameras; persons wearing disguises or articles that obscure their identity (e.g., hoods, hats, sunglasses) will be directed to remove those items prior to entry.

- The Reception Workstation will enjoy natural surveillance over the Screening Lobby, entry/exit pathway, and most of the business frontage through windows. These positions will be protected from unscreened persons by intrusion-resistant windows further protected by locking, steel scissor gates that will be drawn across exterior storefront windows at closing. The reception employee will verify the validity of the identification and that the presenter matches the identification.

In accordance with best security practices, the Restroom will remain inaccessible to customers and under management's control. The Restroom is inaccessible from the Retail Area and requires electronically credentialed access from the sales area to the Break Area to access. In the rare event that an emergency circumstance warrants customer access to the Restroom, the Restroom and the access path thereto have been designed to ensure that any such needs can be accommodated without the escorted customer having to traverse limited-access areas (beyond a small portion of the sales area) and without exposing confidential premises security measures or significant design elements to the customer.

Access Control (Employees)

Employees will be issued employee identification badges / key cards equipped with RFID tags for use in the facility’s electronic access control system. All doors of substance will be equipped with electronically controlled strikes. Employee access to authorized areas will be role-controlled and aligned with the employee's working days and hours. Attempts to access unauthorized areas or attempted access of authorized areas outside of permitted days and hours will cause an electronic

notification to management for follow-up investigation.

Employee badges/electronic access credentials will be strictly controlled, issued upon clock-in, and returned upon clock-out. Supervisory employees will perform daily accounting of employee credentials, which will be required by policy. Employee credentials will be stored in the Management Office. Employees arriving for work will enter the Screening Lobby and be verified as scheduled by the reception employee. Subsequently, the supervisory employee on duty will issue their employee identification and access credentials.

Access Control (Visitors/Vendors)

Visitors and vendors will include transporters (armored carriers and licensed cannabis distributors), service providers (e.g., security systems integrators, utility workers), employment applicants, and regulators (e.g., DCC, local regulators, and Code Enforcement Officers). Visitors and vendors will be managed as follows.

Visitors and vendors will be required to check in with an Embarc employee and will be issued a Visitor Badge that shall be conspicuously worn on their person for the duration of their visit. They'll be assigned an escort and will remain attended for the entirety of their visit. Their name, agency, visit purpose, time in, time out, and areas accessed will be logged. Visitor / Vendor Logs will be maintained in the business records of the business for no less than seven years.

TRANSPORTERS

Armored carriers licensed by the California Highway Patrol and distributors licensed by the Department of Cannabis Control will be contracted by Embarc for the provisioning of product and currency transfers. During this engagement process, Embarc will outline required procedures in writing with the vendor. Procedures will include the following:

- Transfers will be scheduled in advance and shall not occur during hours of darkness.
- Transfer schedules shall be maintained in confidence, details shared only with those employees with a business need to know, and only with sufficient advance notice as required for smooth business operations.
- Names and accompanying photos of scheduled transporters shall be provided to Embarc at the time of service scheduling.
- Telephonic notification of imminent arrival shall be made at least five minutes before arrival, but no more than ten minutes before arrival, to ensure that intake and Security Officers tasked with vendor management are prepared to receive the transporter.
- Upon notice of imminent arrival, management will monitor surveillance at the intake area and direct the Security Officer to stage in the area. The Security Officer will be provided with the names and photos of anticipated drivers.
- Upon transporter arrival, the Security Officer will verify that the transporters match the documentation provided. A duress code word will be incorporated into training to alert management to initiate emergency protocols if appropriate.
- Management will authorize the remote/electronic opening of the Vendor Entrance. The Security Officer will remain posted outside to monitor the transfer of goods and currency and to supervise the transporter's vehicle until the transfer event concludes.
 - A manager will convene with the transporter in the Vendor Lobby to conduct the transfer of goods or currency. Vendors will not be permitted to enter the premises beyond the Vendor Lobby (except to access a Restroom if needed and escorted by employees);
 - Following the transfer, the Vendor Entrance will not be opened to release the transporter until all cannabis goods and/or currency has been removed

from the Vendor Lobby and have been secured in the Intake/Retail Delivery Office; and

- Use of video monitors displaying the immediate exterior will be referenced prior to opening of any door.

SERVICE PROVIDERS

Service providers will be permitted access to the property by appointment only (notwithstanding emergency circumstances). Any unscheduled service providers arriving without an appointment for alleged emergency circumstances will be verified telephonically with their agency prior to acceptance as a visitor. Service providers will be required to check in with the reception employee and will be issued a Visitor Badge that shall be conspicuously worn on their person for the duration of their visit.

EMPLOYMENT APPLICANTS

Applicants for employment will be accepted by appointment only. Walk-ins will be directed to apply online and will be directed to return only upon the establishment of an appointment. Applicants with appointments will be required to check in with the reception employee and will be issued a laminated Visitor Badge that shall be conspicuously worn on their person for the duration of their visit. Applicants will be directed to wait in the Screening Lobby until received by management. Interviews will be conducted in the employee Break Area, limiting applicants' insight to the layout and security features of the business's back-of-house areas.

REGULATORS

City Code Enforcement Officers, Police Officers, Fire Department employees, or other agents or employees of the City, or agents of the Department of Cannabis Control ("Inspecting Authorities") requesting admission for the purpose of determining compliance with DCC or local regulations will be given unrestricted access and allowed entry during all business hours. These Inspecting Authorities shall also have unimpeded

access to inspect all on-site locations, records, reports, documents, points of sale, product, surveillance footage, and any other access deemed necessary to ensure compliance with regulations.

Inspecting Authorities will be required to access the premises by way of the customer entrance and will be required to check in with the reception employee. Inspecting Authorities will be required to remit agency-issued photo identification verifying their lawful business and offered the opportunity to be logged in the Visitor / Vendor Log and to wear a Visitor Badge during their visit. Inspecting Authorities will be assigned an escort for the duration of their visit in the form of a supervisor or manager.

Crimes against cannabis businesses have been carried out by rogue peace officers under the color of authority in California and beyond. Accordingly, in the event that parties claiming to be Inspecting Authorities arrive outside traditional business hours (weekdays between 8:00 am and 5:00 pm), or in those cases where the on-duty supervisor suspects foul play, access may be slightly delayed as management attempts to verify the legitimacy of the parties at hand by contacting their employing agency or by communicating with local law enforcement.

Inventory Control

Inventory control incorporates a layered approach from intake from a licensed cannabis distributor to the sale to a customer. [As outlined above, a door redundant Vendor Lobby supervised by a Security Officer will be used for the unloading of goods.](#) Upon delivery, management or an Inventory Team employee will examine goods for compliance with state packaging and labeling compliance, while verifying the sell-by dates, expiration dates, and general condition of goods prior to acceptance. [Upon intake, goods will be immediately moved from the Vendor Lobby to the Intake/Retail Delivery Office—a room restricted to a limited number of employees tasked with order fulfillment and product intake.](#)

Once goods have been fully vetted and verified as present in Embarc's inventory management software, goods will be shelved in the Secure Product Storage Room. The Secure Product Storage Room is positioned to require breaching of multiple doors and traversing multiple rooms of the premises to access. The Secure Product Storage Room is designed to remain invisible to members of the public or vendors with restricted access. Only limited employees will be afforded unsupervised access to the Secure Product Storage Room. The Secure Product Storage Room is equipped with surveillance cameras providing no blind spots and is complemented by motion detectors, a door contact, and multi-point locking mechanisms.

All transfers of product from the Secure Product Storage Room will be documented in Embarc's Metrc-compliant track-and-trace POS and inventory management system, Treez. A full inventory audit will be performed at least every 30 days, with any significant discrepancies in inventory prompting a full investigation into the loss and associated reporting to the DCC and local law enforcement.

Cash Handling

Most cannabis operators must maintain significant cash onsite to pay taxes and maintain the weekly cadence of inventory deliveries to meet the needs of the business. Depending on the sales volume, this can require hundreds of thousands to millions of dollars in cash onsite, often handled by staff members with little previous experience in cash management.

Embarc employs a number of methods to limit the amount of cash on the premises, including the following:

- Embarc is fully banked;
- Embarc accepts electronic payment; and
- Embarc utilizes wire transfers and checks to pay municipal tax payments and vendors for inventory.

Retail Point-of-Sale

The POS counter has been designed in such a manner as to enhance natural surveillance over the Retail Area while precluding access to cash drawers by customers. Each POS maintains monitoring from at least two opposing surveillance angles. POS stations will be assigned to specific employees with terminal sharing prohibited. Pre and post drawer reconciliation will occur, and any discrepancies will be immediately investigated by a supervisor.

Embarc will enforce a drawer limit of \$1,000.00. As the amount of currency exceeds this limit, all bills in excess of \$200 (reserved for making change) will be removed from the drawer, double-counted, placed in a sealed, signed envelope, and transferred to a currency safe.

At the conclusion of each shift, POS transaction records will be printed from the assigned POS, and the employee will meet with their supervisor to reconcile the POS records with the cash drops into the currency safe under active supervision and video monitoring from opposing viewing angles. A supervisor will place the reconciled funds into the currency safe in the Cash Vault Room.

On the next business day, management will retrieve the funds from the currency safe and will perform a final validation of the reconciliation records and amounts. Upon verification, management will complete a deposit slip and secure the verified deposit and deposit slip into a bank deposit bag. The bank deposit bag will be stored in the currency safe in the Cash Vault Room until the next scheduled armored carrier transfer event.

Payments

To alleviate this risk to public safety, Embarc utilizes the fact that it is fully banked to pay local and state tax payments as well as nearly all inventory payments via wire transfer or check, depending on the vendor's preference. This not

only dramatically reduces the amount of cash onsite; it also ensures our Accounting Team has ongoing oversight into the accounting practices occurring at the store level. Finally, this benefits the store by streamlining the order intake process, saving time and energy.

In rare instances, cash on demand (COD) is required for inventory purchases, particularly from smaller distributors or social equity brands. When COD payments are necessary, store management is responsible for accurately pre-counting the cash in the Management Office or Cash Vault Room. This process includes the use of an electronic money counter, ensuring the precision of payments. All cash handling is conducted under camera surveillance to maintain security and integrity. The counted cash is then stored securely in the currency safe, and details of the payment, including brand name, invoice number, and amount, are meticulously recorded in the Cash Log prior to disbursement.

Storage

CURRENCY SAFE

Currency stored on the premises will be stored in a burglary-resistant safe that meets an Underwriters' Laboratory (UL) rating of TL30 or better, which signifies a combination-locked safe designed to offer maximum door protection against attack by common mechanical and electrical hand tools and any combination of these means. The safe construction requirements are:

- U.L. listed Group 2M, 1, 1R combination lock or Type 1 electronic lock
- 750 lbs. minimum or comes with instructions for anchoring in a larger safe, concrete blocks or on the premises where used.
- Body walls of material equivalent to at least 1" open hearth steel with a minimum tensile strength of 50,000 P.S.I.
- Walls fastened in a manner equivalent to continuous ¼" penetration weld of open hearth steel with minimum tensile strength of 50,000 P.S.I.

- One hole ¼" or less, to accommodate electrical conductors arranged to have no direct view of the door or locking mechanism.

The performance requirements for the safe include that the door successfully resist entry for a net working time of 30 minutes when attacked with common hand tools, picking tools, mechanical or portable electric tools, grinding points, carbide drills, pressure-applying devices or mechanisms, abrasive cutting wheels, and power saws.

Supervisory employees are the only on-site employees with access to the currency safe without exception.

Whenever feasible, the Cash Vault Room is located inside the Management Office, and one must navigate through multiple sequentially locked doors equipped with steel frames, latch protectors, and auto-closers. The doors will be equipped with commercial-grade, non-residential door locks. Access to this highly secured Management Office is strictly controlled and limited to authorized supervisory employees only, with each entry meticulously logged and monitored through RFID-equipped key card identification badges. During power interruptions, no doors of the premises will be solely controlled by an electronic access control system. All doors equipped with electronic access controls will maintain traditional hard-key operation capabilities and will be equipped to default into a locked state.

RETAIL SALES AREA

Currency in the front-of-house areas is limited to the ATMs and POS stations, an area occupied by employees during all operating hours and that is physically separated from the customer-accessible area by service counters. All currency in the POS stations will be situated in cash drawers, which are built into the counters rather than placed on top of the counter, as an additional layer of security.

Therefore, currency is outside the reach of customers, notwithstanding a customer making overt, apparent movements likely to draw the attention of staff to their actions.

ATMs are strategically located in the Retail Sales Area, providing customers with the option to withdraw cash for their purchases. In compliance with regulations, they will be easily accessible to individuals with disabilities, adhering to ADA standards. Positioned in well-lit areas under continuous surveillance, these ATMs will ensure user privacy, especially during PIN entry. The ATMs will have set transaction limits, robust cash handling procedures, and anti-skimming security measures. Regular audits will be conducted to ensure operational and security compliance, and the ATM placement will allow for easy access for servicing and emergency situations, maintaining their safety and effectiveness.

Deposits

Embarc will contract with an armored carrier licensed by the California Highway Patrol for the depositing of cash and provision of change-making bills as needed. Scheduling and access will be managed as outlined previously in this plan. Collection will be scheduled at various times in the afternoon hours so as to minimize the amount of currency on the premises at any given time.

Perimeter Security

Alarm System

Embarc will maintain a professionally installed and centrally monitored fire, robbery, and burglary alarm system. Such system shall be installed, maintained, and monitored by an Alarm Company Operator (ACO) licensed by the California Bureau of Security and Investigative Services. Embarc will acquire an alarm permit if required locally and will comply with all conditions of such permit. The alarm permit will be conspicuously posted in the lobby of the premises, if required.

A licensed and insured PPO will be contracted by Embarc for the provision of mobile alarm response. The contracted PPO shall be capable of and required to provide a physical response in a timely manner, not to exceed 20 minutes from notification of an alarm (UL Standard).

In the event of an intrusion alarm, the ACO monitoring center will be equipped to remotely access premises cameras and to engage persons on site verbally through talk-down speakers.

- Where nuisance activity is afoot, but no criminal activity is apparent, remote monitoring agents will direct offenders away under threat of police notification.
- Where nuisance activity continues, the PPO will be dispatched to mitigate the circumstances on the property. The PPO will draw on police resources only where nuisance offenders are uncooperative or are chronic nuisance offenders.
- Where no indications of activity are apparent, the PPO will be dispatched to investigate. The PPO will be directed to retreat to a position of safety and monitoring of the site and to notify local Police if evidence of criminal activity is discovered during the response. The PPO will be directed to remain nearby and available to police to the extent needed and will remain until police conclude their response. Where physical damage to the premises renders the site accessible, the PPO will be required to remain present at the affected area(s) until leadership of Embarc resumes control of the property.
- In the event that the remote monitoring reveals active or fresh criminal activity, the monitoring center will not notify the PPO, but will dispatch local Police and notify the Embarc leadership team, including its Security Chief. The Security Chief maintains a tablet equipped for immediate access of all Embarc surveillance systems and will be able to immediately begin transmitting

relevant data to on-scene police officers as requested (e.g. suspect/vehicle images).

- In the event of a robbery/panic alarm triggering:
 - The security equipment on the premises will prompt an immediate call to local law enforcement's emergency dispatch telephone number.
 - The ACO monitoring center will call local law enforcement's emergency dispatch telephone number, while simultaneously accessing the video surveillance network of the premises to assess activity on site in an effort to determine if the activation was warranted or accidental. The monitoring center will share their observations with local Police in real time.
 - As desired, if no criminal activity is apparent, the monitoring center will contact the store to speak to management and receive the cancellation code (or duress code word, as the case may be).

The premises alarm system will be equipped with:

- battery back-up providing for at least 24 hours of continued operation in the event of a power failure
- cellular back-up to ensure continued notifications in the event of a facility phone line disruption
- line monitoring features that perform frequent call-backs between the on-site monitoring equipment and the central station to ensure no interruptions in system communication capabilities
- non-emergency notification technology that allows managers and the contracted PPO to be notified of detected system failures (e.g., power loss, communication loss)
- audit features that allow Embarc to audit and export all system activity for no less than 90 days

- regularly testing policy - at least weekly

Management capable of providing access to all rooms of the premises will be able to respond to the premises within one hour of notification. Embarc will maintain a contact list, including a manager capable of providing such a response, to local law enforcement. As changes are made to this contact list, Embarc will update local law enforcement with a revised contact list without delay.

Supervisory employees whose work requires the issuance of alarm codes will be issued an individual user code. Sharing alarm codes will be strictly prohibited. Embarc will audit this log for suspicious activity on a monthly basis and maintain a log of auditing activities. Any suspicious activity discovered during the audit process will be immediately investigated.

Remote user accounts will be restricted to Read-Only privileges. Remote users will not be equipped to modify system configurations remotely. User accounts provided administrative privileges shall be restricted to on-premises use by the General Manager or owners.

Access Control

Contact sensors will be installed to detect entry and exit from all secure areas and shall be monitored by an ACO licensed by the Bureau of Security and Investigative Services. The alarm plan has been developed to meet UL Standard 681-2014, Extent 2—that standard most often applied to banks, credit unions, and jewelry stores. This includes the presence of a door contact sensor on all exterior doors and all interior doors leading to a viable target or that reside upon a path between the outside and such target area. The premises design is intended to delay intrusion efforts by requiring intruders to mitigate each intervening security-featured door along their path. Incorporating electronic access controls and alarm contacts on all of these doors enforces this

policy—preventing the system from arming at the close of business until all doors are secured.

Panic Buttons

Panic buttons will be installed in locations as approved by the Police Chief or their designee and will include direct notification to local law enforcement as outlined above. Silent panic/robbery alarm triggers monitored by a central station and equipped for direct notification to local law enforcement will be installed at the Reception Workstation, each POS, Management Office, Cash Vault Room, and Secure Product Storage Room. Assigned Security Officers will wear panic pendants capable of activating the premises' robbery alarm. The pendants feature a dual-button system to detract from accidental triggering.

Surveillance System

Embarc will incorporate a video surveillance system with cameras of at least HD quality and a video recording system that has been professionally installed. Recordings required by DCC regulations will be stored for no less than 90 days.

Cameras will be positioned to monitor all doors into the building on the business site, the parking lot, loading areas, interior spaces where cannabis or currency are being stored for any period of time on a regular basis, all interior spaces where diversion of cannabis could reasonably occur, and all exterior sides of the property adjacent to the public rights-of-way in a manner that protects the inventory, facility, and employees.

All cameras will record in color, and all exterior cameras shall be in weather-proof enclosures, shall be located so as to minimize the possibility of vandalism, and shall have the capability to automatically switch to black and white (infrared) in low light conditions. The recording system will be capable of exporting the recorded video in standard MPEG formats to another common medium such as a DVD or USB drive. Network

security protocols shall be certified by Underwriters' Laboratory.

Embarc will ensure that its video surveillance footage is remotely accessible by local law enforcement or its designee(s) on a real-time, live-access basis. Embarc will provide all necessary information to facilitate such remote access. Video shall be of sufficient quality for effective prosecution of any crime found to have occurred on the site and shall be capable of enlargement via projection or other means. To ensure the quality of video and enlargement capabilities, the surveillance plan herein has been developed to ensure a standard of 100 pixels per foot of resolution in targeted viewing areas. Commitment to resolution of 100 at targeted viewing areas ensures that images will handle substantial magnification before pixelating affects become apparent).

Embarc will maintain a digital video assessment and surveillance system (VASS) that will be installed by a third-party technology integrator. VASS installation will be performed professionally, ensuring that placements and associated cabling are protected against intentional or unintentional damage. Cameras will be placed in a manner that avoids intentional or unintentional obscurity.

Each camera will be permanently mounted and in a fixed location. Each camera will be placed in a location that allows the camera to clearly record activity occurring within 20-feet of all points of entry and exit to and from the premises. The surveillance cameras will provide for the clear and certain identification of any person and activities in the targeted viewing areas. Certain identification is deemed 80 pixels per foot in the targeted viewing area.

All recordings and still frames produced will be accurately date and time stamped in accordance with measurements from the United States National Institute Standards and Technology standards.

Remote user accounts (including those provided to local law enforcement and its designees) will be restricted to Read-Only privileges. Remote users shall not be equipped to modify the system configuration remotely. User accounts provided with administrative privileges will be restricted to on-premises use by senior management or owners. Where permissible by the VASS platform, remote connections to the surveillance server will be restricted to explicitly identified IP addresses of known/vetted parties with a business need to access the surveillance system remotely. Accounts with administrative privileges will be uniquely named, avoiding the use of generic/default usernames such as “admin” or “sysadmin” that could be locked out by way of repeated failing remote access efforts.

The VASS will:

- Be operational at all times, both during and after business hours
- Maintain sufficient cameras, angles of observation and lighting to allow facial identification of persons throughout interior and exterior areas where cannabis, currency, or security infrastructure is present
- Be equipped with sufficient battery backup to support a minimum of 30 minutes of recording time in the event of a power outage
- Transmission-controlled protocol (TCP) enabled and capable of access over the internet
- Be capable of recording all areas designated in any lighting conditions
- Be stored in a locked, secure area that is accessible only to the management team
- Be equipped with a failure notification system that provides electronic notice to Embarc and contracted PPO in the event of any prolonged surveillance interruption or failure lasting longer than fifteen minutes (system updates)

- Record at no less than 15 frames per second;
- Archive footage for no less than 90 days
- Be capable of producing DVDs or other removable media of recordings made by the surveillance system, including still photograph images in a standard format (e.g. MPEG, JPG) that will not require proprietary software to open/transfer/view

ANALYTICS CAMERAS & LIVE VIDEO MONITORING

Embarc exterior, including sides of the business with entrances and exits, is equipped with a state-of-the-art analytical surveillance camera system installed and monitored by our contracted ACO. This system provides live video monitoring analytics for each side of the structure with an entrance or exit, ensuring comprehensive coverage of all access points.

The technology employs Artificial Intelligence (AI) driven analytics to identify suspicious or unwanted behaviors—such as loitering—within the camera’s field of view. Upon detection, operators can utilize a “talk-down” feature to audibly engage and deter individuals without exposing on-site Security Officers to risk.

In addition to live engagement, the integrated alarm and video management system reduces response time by providing the ACO with immediate, real-time visibility of the premises. This enables rapid coordination with local law enforcement when necessary, ensuring that any potential security threat is addressed without delay.

Exterior Lighting

Perimeter lighting systems will be installed for after-hours security if requested by the Police Chief and Community Development Director or their respective designees. Embarc will employ motion sensor lighting if required; however, we encourage the City to reconsider and generally

discourage the application of motion sensor lighting on projects requiring high security, such as cannabis businesses. Motion lighting has a number of negative impacts on premises security including the following:

- Uniform white lighting serves as a natural deterrent to crime and provides general safety and security lighting. Where motion dictates the presence of this lighting or not, where the premises is void of motion, the premises may remain dark. This could incentivize criminal acts by promoting an inactive presence on the property in contradiction to CPTED territorial reinforcement principals.
- Studies into the effect of lighting changes and witness accuracy/reliability have demonstrated that witness reliability is dramatically affected where their observations of a person, vehicle, or circumstance occur amidst changing lighting conditions or where an offender is witnessed traversing between areas that are lighted and unlighted (areas with non-uniform lighting).
- Uniform white lighting to a level of 1.5 foot candles or better is capable of emulating daylight sufficient to keep surveillance cameras operating in full color mode for best evidentiary value. While standard modern cameras include automated transition capabilities from color to infrared (“black and white”) and vice versa, the transitional period affects the quality and reliability of video surveillance footage—often resulting in washed-out images for 2-5 seconds. Crime happens fast, and those seconds of footage lost are often the most valuable segments of footage an investigator would have hoped for (e.g., the moment when the vehicle/person is close enough to the building to activate the lighting and is also close enough to ensure certain identification of the person, vehicle, license plate, or other descriptive elements).

Uniformed Security Services

To promote the safety and security of the premises, ensure compliance with local and state regulations, and enforce Embarc’s on-site policies, Embarc will maintain security personnel either through its own state-issued Proprietary Private Security Employer (License # PSE1642) license or via a contracted Private Patrol Operator (PPO) licensed by the California Bureau of Security and Investigative Services (BSIS).

In accordance with the standards and practices of the Private Security Services Act, any person employed in a uniformed security capacity will have undergone a California DOJ and FBI background investigation prior to licensure and ongoing clearances through the live-scan system of California.

Services will include, at a minimum, one uniformed Security Officer during all business hours. Embarc will ensure that all security personnel comply with the requirement to be at least 21 years of age.

SECURITY MONITORING STATION

While stationed here between patrols of the premises, the Security Officer will:

- Maintain natural surveillance over the business frontage, Screening Lobby, Reception Workstation, and Retail Sales Area
- Maintain video-assisted surveillance with a large display
- Maintain active awareness of the allowable number of customers in the Retail Sales Area as determined by an appropriate staff-to-customer ratio, communicating capacity availability to the reception employee who will control the order in which customers are invited from the Screening Lobby

PATROL

While performing intermittent foot patrols of the premises, the Security Officer will:

- Ensure that all access control policies are duly maintained while deterring and

mitigating nuisance activities occurring upon or immediately about the premises

- Respond at the direction of management to verify and supervise activities related to inbound distributors, armored carriers, and retail delivery drivers

Security Services After Business Hours

Embarc will utilize a combination of onsite Security Officers and offsite monitoring to ensure 24/7 coverage and best-in-class technological practices.

Embarc will deploy an enhanced after-hours security strategy. This approach prioritizes high-tech surveillance, monitoring, and verified response patrol services, ensuring robust after-hours protection. This model has been successfully implemented at more than a dozen Embarc locations across the state, demonstrating both its efficacy and reliability.

This strategy includes the deployment of a sophisticated analytical surveillance camera system, which was described in detail above. The system features an advanced "talk-down" capability designed to actively intervene during security incidents remotely, thereby minimizing direct risk to human security personnel. This high-level surveillance is complemented by a verified response security patrol, ensuring comprehensive coverage and effective response to any security concerns.

The surveillance system utilizes AI to analyze digital video signals and identify unwanted or suspicious behaviors, such as loitering within the camera's field of view. Upon detection, the system notifies the ACO monitor and can play a prerecorded message to deter the intruder. An operator from the ACO may engage further, including coordinating with local law enforcement if necessary.

As described above, Embarc will contract with a licensed PPO to provide a verified response security patrol to alarm activations. The PPO will

also be required to provide a physical response with a licensed, uniformed Security Officer within 20 minutes of notification to address any failures in surveillance or alarm systems.

